

Brunelle & Clark Consulting, LLC

**ASBESTOS SURVEY
LEAD PAINT SCREENING &
LEAD WASTE CHARACTERIZATION
FOR DEMOLITION OF THE
GARBERVILLE LIBRARY
715 CEDAR STREET
GARBERVILLE, CA**



May 28, 2019

Project # 1900203

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1.0 PURPOSE

On April 29 & 30, 2019, this office conducted an asbestos survey, paint screening for lead, and lead waste characterization, for the demolition of the Garberville Library building located at the above referenced address.

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

To provide data for compliance with the Cal/OSHA Lead in Construction Standard Title 8, CCR Section 1532.1, and for compliance with California Code of Regulations Title 17, CCR 35000-36100, representative paint sampling was conducted using a portable X-ray fluorescence (XRF) paint analyzer.

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

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

2.0 EXECUTIVE SUMMARY

The subject building is a single-story triple-wide modular structure sitting on a pier block foundation. It contains a large main room, a kitchen, and a short hallway adjacent to two restrooms. Interior walls are constructed of gypsum board drywall finished with texturing. The floors in the main room and the kitchen are carpeted while the floors in the hall and the restrooms are finished with sheet flooring. There are fiberglass ceiling panels throughout much of the building, and fiberglass insulation in the walls and ceilings. The exterior is finished with plywood over a gypsum board substrate lacking joint compound. Windows are all metal framed. The roof is finished with

a torch-down composition roofing membrane, with some composition shingles used along the fascia-type trim. See Figures 1-4 (Appendix A).

Asbestos Survey

The asbestos survey includes 56 bulk samples from suspect interior, exterior and roofing materials as well as samples from the concrete ramp, stair landings and the asphalt parking area.

One type of material was found to contain asbestos. The sampling, analytic methods, and results are further explained in Section 3.0.

The disturbance, abatement, and demolition of the materials containing asbestos will require compliance with the EPA NESHAP and Cal/OSHA regulations regarding asbestos in construction, which are further explained in Section 4.0.

Lead Paint Screening

In order to characterize the lead content in paint coatings of materials impacted by this project, paint screening was performed on interior and exterior components using a portable XRF (X-ray fluorescence) paint analyzer. The paint sampling results are summarized in Table 3 (Appendix B).

As determined by the site sampling, some of the paint coatings are Lead Containing Surface Coatings (LCSC), with trace amounts of lead detected, and most are considered negative for detectable lead. The sampling, analytic methods, and results are further explained in Section 5.0.

The disturbance of any materials containing any amount of lead will require compliance with State and Federal regulations, as explained in Section 6.0.

Lead Waste Characterization

One representative sample of the “combined” anticipated demolition waste stream for the subject building (sample GL-LWA) was collected and submitted for lead waste characterization analyses.

Based on the analysis results, the anticipated demolition waste steam for the buildings is categorized as Non-Hazardous waste by both Federal and California criteria. The sampling, analytic methods, and results are further explained in Section 5.0.

The characterized demolition waste can be disposed of as general “construction debris” at any accepting Class II or Class III landfill. State and Federal requirements are further explained in Section 6.0.

3.0 ASBESTOS SURVEY

During this survey, a total of fifty-six (56) 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 asbestos sample locations are indicated on Figures 1 & 2, Appendix A.

The bulk samples were submitted to an NVLAP accredited laboratory, AmeriSci LA (Carson, CA) for the analysis of asbestos content by Polarized Light Microscopy (PLM) by EPA 600/R-93/116, including requirements for EPA 600/M4-82-020 per 40 CFR 763. The sample Chain of Custody and Laboratory Report is contained in Appendix B. All the asbestos analytic data is summarized in Table 1, Appendix B.

The following terms are referred to in this report. See Section 7.0 (Asbestos Regulations & Definitions) for other common asbestos terminology.

- ***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 one building material at this site. Materials are divided into categories according to percentage and type of asbestos found in the materials, as defined above. The asbestos containing materials identified during this survey are listed below.

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

ACM

- **Tar roof patch, gray-black.**

Note: All roof patching compounds are ACM regardless of color.

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

The project ACM is listed in Table 2 below, including location, asbestos content, the agency categorization, abatement requirements, and waste categorization. The locations of the project ACM are shown on Figure 4, Appendix A.

TABLE 2
ASBESTOS IDENTIFICATIONS & CLASSIFICATIONS

Garberville Library
715 Cedar St., Garberville, CA

MATERIAL	LOCATION	QUANTITY	ASBESTOS CONTENT & TYPE	OSHA CLASSIFICATION	NESHAP CATEGORY	WASTE DISPOSAL CLASSIFICATION
Tar Roof Patch, gray-black Note: all tar roof patch is ACM and all other colors	Roof, around all drains, septic & exhaust vents, and as surficial patches on roof membrane	Approx. 75 SF	3% CH	ACM, Class II abatement required when disturbed	Category I Non-Friable ACM. Not RACM*	Non-Friable Asbestos Waste

SF = Square Feet LF = Lineal Feet CF = Cubic Feet

CH = Chrysotile asbestos CR = Crocidolite asbestos AM = Amosite asbestos

TR = Tremolite AN = Anthophyllite AC = Actinolite

ACM = Asbestos Containing Materials, containing >1% asbestos

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

PACM= Presumed ACM

RACM = Regulated ACM under NESHAP regulations

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

TBD = Abatement quantity to be determined for actual remediation work

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

4.0 CONCLUSIONS AND REGULATORY REQUIREMENTS FOR ASBESTOS

Tar roof patch material containing asbestos was identified as present around roof vents, drains, and as surficial patches on the roof membrane. The asbestos containing materials will require abatement prior to renovations that will disturb the asbestos containing material, or demolition of the structure. The following conclusions and regulatory requirements apply to this project specifically.

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

Friable NESHAP Regulated Asbestos Containing Material (RACM) was not identified during this survey. A **NESHAP Notification for “abatement” will not be required** prior to abatement activities. See the “EPA NESHAP” section below for detail on the NESHAP notification requirements.

This is a demolition project, and a **NESHAP Notification for “demolition” will be required** prior to demolition activities. See the “EPA NESHAP” section below for detail on the NESAP notification requirements.

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

Cal/OSHA regulates any disturbance or abatement of any material containing any amount of asbestos. All Cal/OSHA regulatory requirements must be followed. See the Cal/OSHA section below for further discussion of regulatory requirements.

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

The following requirements apply to the abatement of the materials containing asbestos:

- All asbestos abatement must be performed by properly trained and certified asbestos abatement contractors & workers, using proper abatement methods.
- All abated asbestos must be properly disposed. See Table 2 above, and the Project ACM & ACCM section below for specific material waste requirements.

The following requirements and recommendations apply to the demolition of the structure:

- All ACCM & ACM must be abated (removed) from the structure prior to demolition of the structure.

- Following abatement of all ACCM & ACM the remaining structure may be demolished by the general contractor with no asbestos related restrictions.

Project ACM & ACCM

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

ACM Roof Patching: Any abatement or disturbance of the ACM roof patching compounds as identified in this report must be done by a licensed asbestos abatement contractor using Class II methods if done essentially “intact,” with disposal as “non-friable” asbestos.

This data and conclusion 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 this 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).

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. See above for project specific requirements. Refer to Section 7.0 for further discussion of asbestos regulations.

EPA NESHAP

All commercial, public, institutional, industrial, residential parcels containing two or more separate structures, and residential structures with more than four dwelling units, are subject to the EPA NESHAP regulations concerning renovation and/or demolition work, as enforced by the North Coast Unified Air Quality Management District (NCUAQMD) located in Eureka, California. 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 NCUAQMD 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 as of the date of this report, a \$268.00 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 NCUAQMD 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, the current \$268.00 filing fee is required for each notification.

The assistance of the asbestos abatement contractor will typically be needed to file the NESHAP Notification form. Contact the NCUAQMD (443-3093) if any questions arise.

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://www.dtsc.ca.gov/IDManifest/TempHWID.cfm>

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 or 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.

5.0 PAINT SAMPLING/LEAD ANALYSIS

During this survey screening for lead in paint was conducted on representative building components of the surveyed building to determine if the paint coatings contain lead, and lead waste characterization was conducted to determine the lead hazard category of the demolition waste.

XRF Paint Sampling

Screening 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 twenty-seven (27) components on the interior and exterior of the surveyed 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 Figure 3, 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/cm².
- **Lead Containing Surface Coatings (LCSC)** are paints with lead content that include 0.1 mg/cm² and range up to but not including 1.0 mg/cm².
- **Undetectable for Lead** are results of less than 0.1 mg/cm² lead content, and are deemed to be essentially “lead free.”

By XRF analyses: Eight (8) sampled components have LCSC, nineteen (19) were found to be “negative” for detectable lead, and no Lead Based Paint (LBP) was identified. See Table 3, Appendix B for a description of all sampled components, sample locations, and sampling data.

Lead Waste Characterization

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

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

Sample GL-LWA: anticipated demolition waste stream for the Garberville Library building.

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

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

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

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

Based on the TTLIC analytic result of <20 mg/kg (milligrams per kilogram) lead content, and the TCLP analytic results of 0.11 mg/L (milligrams per liter) lead content, the demolition waste for the building is categorized as Non-Hazardous waste by both Federal and California criteria.

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

6.0 CONCLUSIONS & REGULATORY REQUIREMENTS FOR LEAD

The site sampling of paint coatings identified the presence of **some LCSC on various painted components** as identified in Table 3, Appendix B.

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, and compliance with the California Code of Regulations Title 17, CCR 35000-36100.

Any contractor conducting lead related construction work should be familiar with the applicable lead regulations, and certified to conduct lead related activities. All personnel conducting lead related construction work should be trained and certified to conduct lead related activities.

Based on the lead waste characterization of the anticipated demolition waste, the anticipated demolition waste (minus ACCM and/or ACM) is categorized as Non-Hazardous waste by both the State of California and by federal standards, therefore the demolition waste may be transported and disposed of as “general construction debris” at any accepting Class 2 or Class 2 landfill facility in California.

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

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

Some of the basic regulatory requirements for lead related construction work and lead containing waste are discussed below. Refer to Section 8.0 for further discussion of lead regulations.

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://www.dtsc.ca.gov/IDManifest/TempHWID.cfm>**

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.

7.0 ASBESTOS REGULATIONS & DEFINITIONS

Regulations

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

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

EPA National Emissions Standard For Hazardous Air Pollutants (NESHAP): The NESHAP regulation (40 CFR, Part 61, Subpart M) 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.

Definitions

The following definitions include some of the more common asbestos terminology. Refer to the regulations above for more definitions.

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

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

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

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

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

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

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

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

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

Post-Abatement Clearances: Pursuant to AHERA regulations, for all K-12 schools, post abatement visual inspection of all abatement work must be conducted by a Certified Asbestos Consultant. Post-abatement “clearance” testing for air-borne asbestos in all indoor work areas is also required. Personnel that are not trained and certified for asbestos work cannot enter the abatement area until after it has passed the post-abatement “clearance” testing.

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

Project Specifications: This report does not provide or constitute project specific “specifications” for any abatement or repair work on this site or for this project. This report provides data, and recommendations as based upon that available data, upon Federal, State and local regulations, and upon general industry practices and standards. To more fully protect their interests, some clients may wish to obtain detailed specifications for asbestos abatement projects, and may also wish to retain consultant oversight services for those projects.

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

Worker Exposure Testing: Under Cal/OSHA regulations, the abatement contractor is required to collect one or more personal air samples on their workers during the abatement work to monitor potential worker exposure to (asbestos) fibers, which are not to exceed the Permissible Exposure Limit (PEL). Those samples are submitted for lab analysis by Polarized Contrast Microscopy (PCM) and calculated to a time weighted eight-hour average. This testing is not to be confused with “clearance testing” as described below, but nonetheless, the results of the abatement contractor’s exposure monitoring samples should be available to the client.

8.0 LEAD REGULATIONS & DEFINITIONS

Regulations

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

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

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

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

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

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

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

Definitions

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

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

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

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

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

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

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

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

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

- (1) Use containment;
- (2) Ensure that the work area has no visible dust or debris following the completion of a project;
- (3) Demonstrate compliance with (a)(1) and (a)(2) to the Department or local enforcement agency, as defined in section 105251 of the Health and Safety Code, upon request.

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

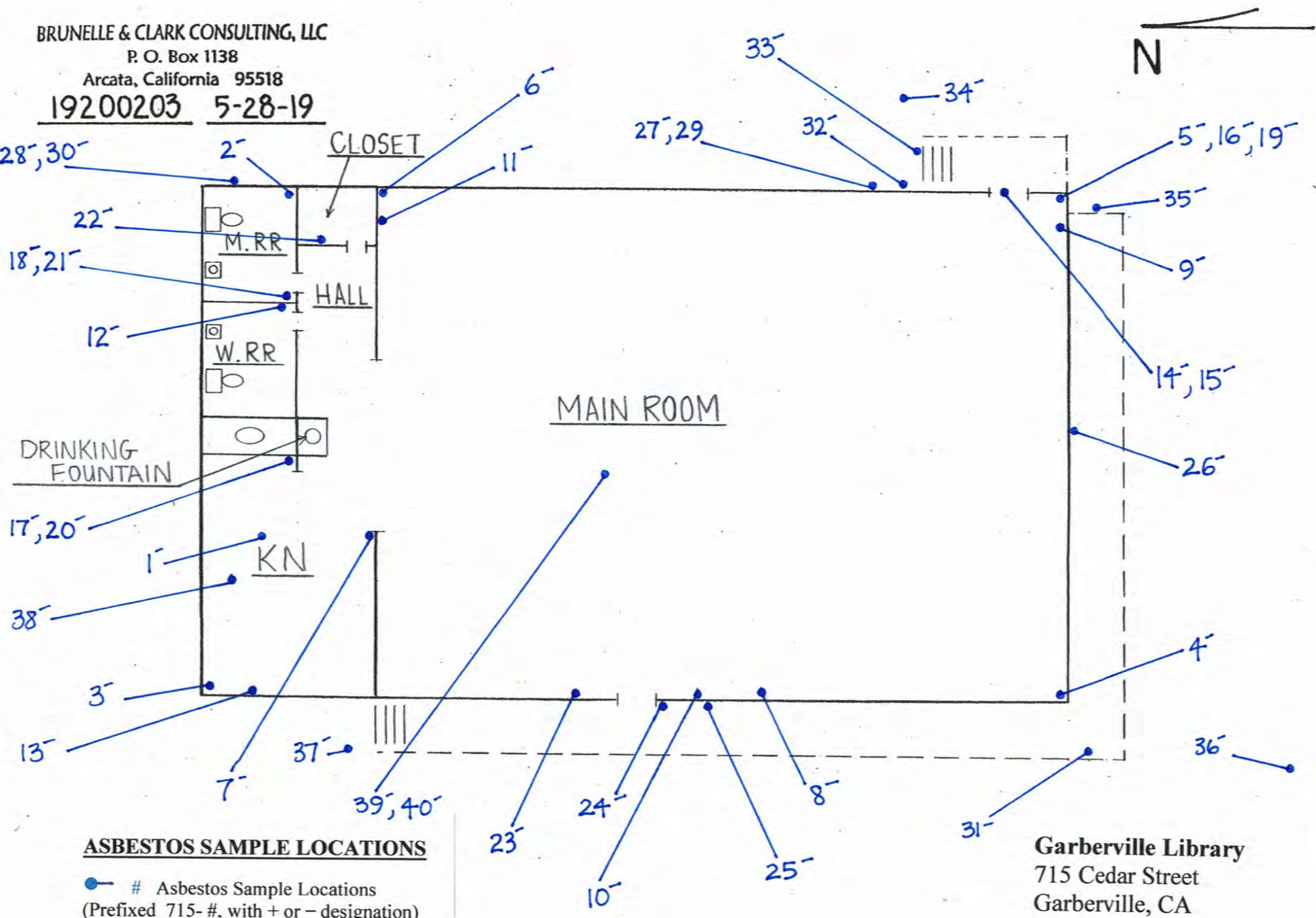
9.0 DISCLAIMER

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

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

-end of text-

APPENDIX A
Figures

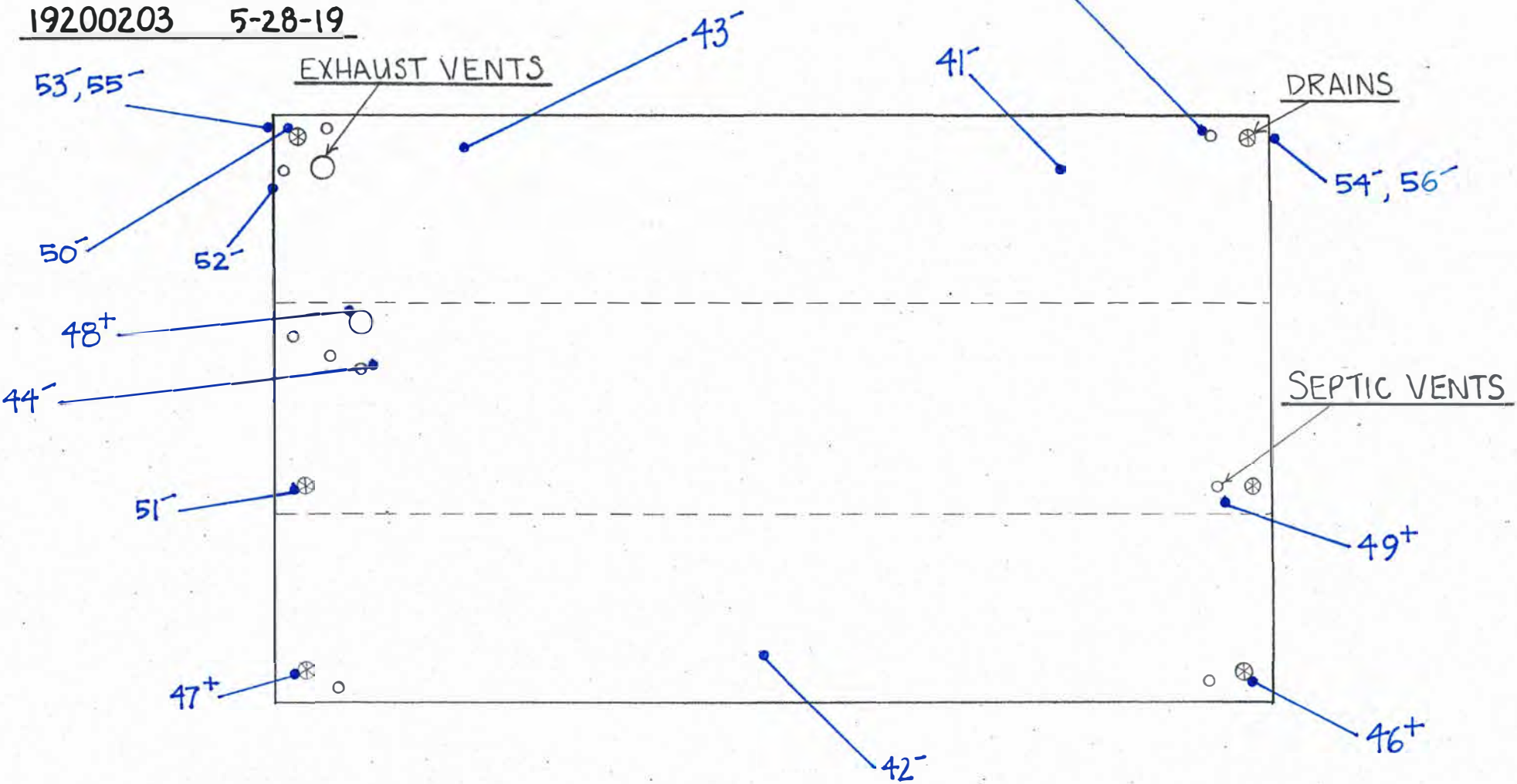


ASBESTOS SAMPLE LOCATIONS

● # Asbestos Sample Locations
(Prefixed 715-#, with + or - designation)
(+) is positive for Asbestos, (-) is negative

Garberville Library
715 Cedar Street
Garberville, CA

FIG. 1

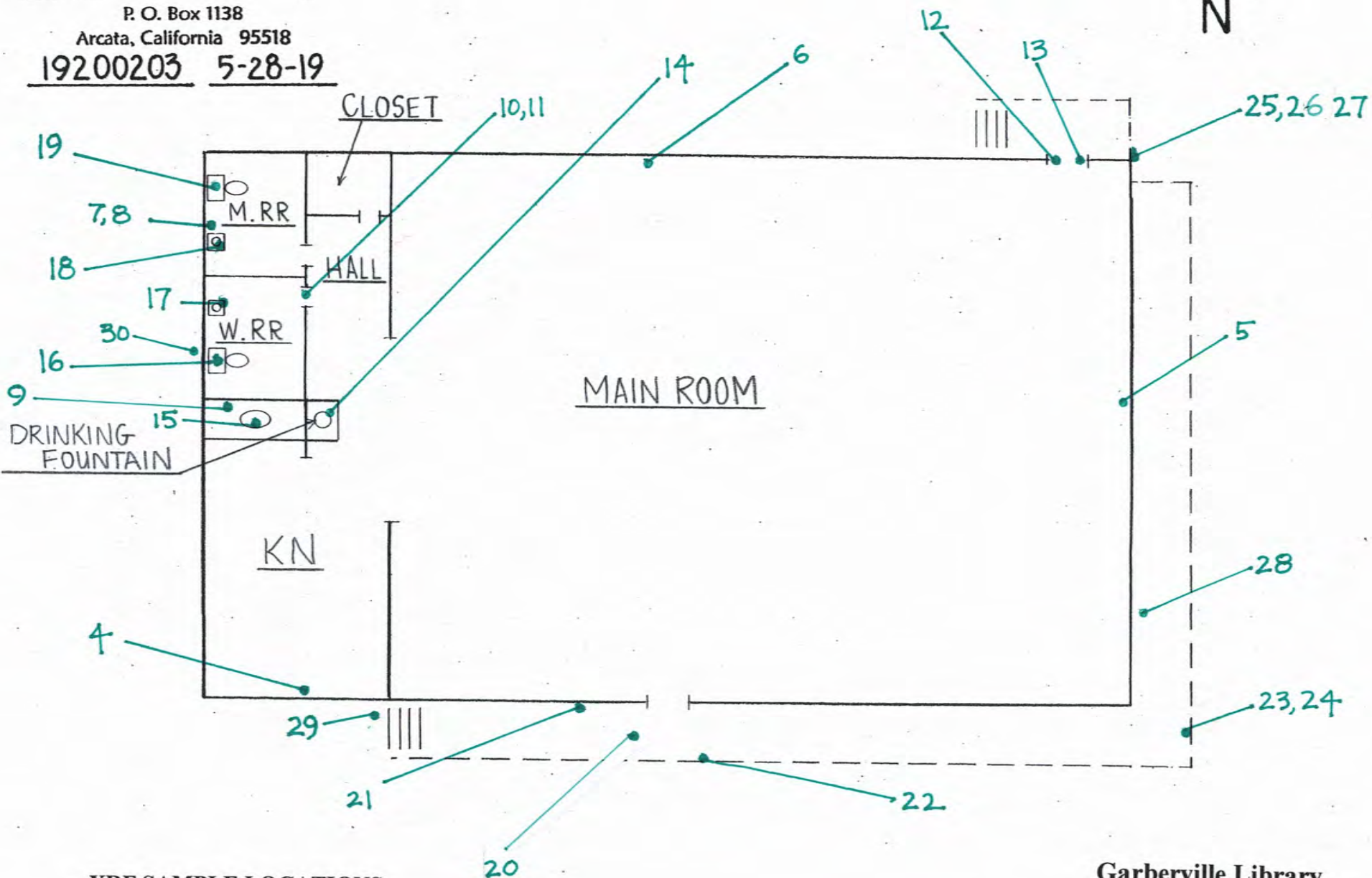


ASBESTOS SAMPLE LOCATIONS

● # Asbestos Sample Locations
(Prefixed 715- #, with + or - designation)
(+) is positive for Asbestos, (-) is negative

Roof
Garberville Library
715 Cedar Street
Garberville, CA

FIG. 2

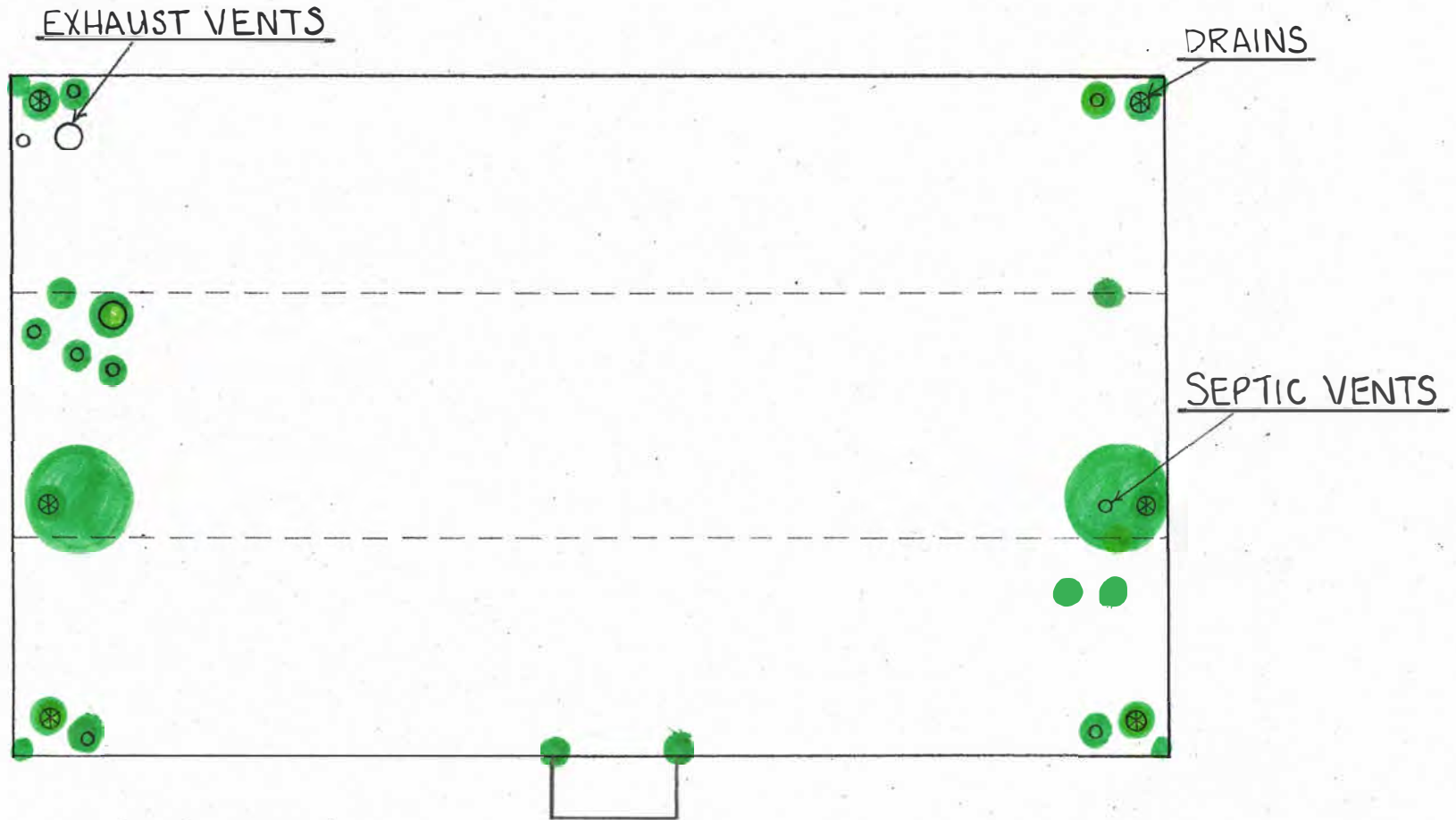
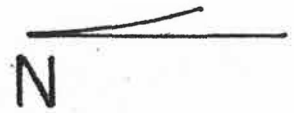


XRF SAMPLE LOCATIONS

● # XRF Sample Location

Garberville Library
715 Cedar Street
Garberville, CA

FIG. 3



ASBESTOS LOCATIONS

- ACM Tar roof patch gray-black.
See Table 2 for location details

Roof
Garberville Library
715 Cedar Street
Garberville, CA

FIG. 4

APPENDIX B
Tables & Laboratory Reports

**TABLE 1
SUMMARY OF ASBESTOS ANALYTIC DATA**

**Garberville Library
715 Cedar Street
Garberville, CA**

Sample Number	Sample Description (each layer)	Location	Asbestos % and Type	Friable vs. Non-Friable	Comments
715-1	Ceiling panel, 2x4, white and yellow fiberglass	Kitchen, drop ceiling	None Detected	Non-Friable	
715-2	Joint compound	Men's RR, wall	None Detected	Non-Friable	
<i>2nd layer</i>	...gypsum board	"	None Detected	Non-Friable	
715-3	Joint compound	Kitchen, wall	None Detected	Non-Friable	
<i>2nd layer</i>	...gypsum board	"	None Detected	Non-Friable	
715-4	Joint compound	Main room, wall	None Detected	Non-Friable	
<i>2nd layer</i>	...gypsum board	"	None Detected	Non-Friable	
715-5	Joint compound	Main room, wall	None Detected	Non-Friable	
<i>2nd layer</i>	...gypsum board	"	None Detected	Non-Friable	
715-6	Joint compound	Main room, wall	None Detected	Non-Friable	
<i>2nd layer</i>	...gypsum board	"	None Detected	Non-Friable	
715-7	Joint compound	Kitchen, wall	None Detected	Non-Friable	
<i>2nd layer</i>	...gypsum board	"	None Detected	Non-Friable	
715-8	Joint compound only	Main room, wall	None Detected	Non-Friable	
715-9	Texture, skip trowel	Main room, wall	None Detected	Non-Friable	
715-10	Texture, skip trowel	Main room, wall	None Detected	Non-Friable	
715-11	Texture, skip trowel	Main room, wall	None Detected	Non-Friable	
715-12	Texture, skip trowel	Women's RR, wall	None Detected	Non-Friable	
715-13	Texture, skip trowel	Kitchen, wall	None Detected	Non-Friable	
715-14	Door core, brown cardboard	Main room, east entry, door fill	None Detected	Non-Friable	
715-15	Door core, brown cardboard	Main room, east entry, door fill	None Detected	Non-Friable	
715-16	Baseboard mastic, tan	Main room, vinyl baseboard	None Detected	Non-Friable	

**TABLE 1
SUMMARY OF ASBESTOS ANALYTIC DATA**

**Garberville Library
715 Cedar Street
Garberville, CA**

Sample Number	Sample Description (each layer)	Location	Asbestos % and Type	Friable vs. Non-Friable	Comments
715-17	Baseboard mastic, tan	Kitchen, vinyl baseboard	None Detected	Non-Friable	
715-18	Baseboard mastic, tan	Men's RR, vinyl baseboard	None Detected	Non-Friable	
715-19	Carpet glue, yellow	Main room, floor, under carpet	None Detected	Non-Friable	
715-20	Carpet glue, yellow	Kitchen, floor, under carpet	None Detected	Non-Friable	
715-21	Sheet flooring, tan mosaic	Men's restroom, floor	None Detected	Non-Friable	
2 nd layer	Tan glue	"	None Detected	Non-Friable	
715-22	Sheet flooring, tan mosaic	Hall closet, floor	None Detected	Non-Friable	
2 nd layer	Tan glue	"	None Detected	Non-Friable	
715-23	Sheet flooring, tan mosaic	Main room, entry, floor	None Detected	Non-Friable	
2 nd layer	Tan glue	"	None Detected	Non-Friable	
715-24	Leveling compound, gray	Exterior, ramp, under roll comp	None Detected	Non-Friable	
715-25	Roofing, roll comp, brown	Exterior, ramp, tread	None Detected	Non-Friable	
715-26	Roofing, roll comp, brown	Exterior, ramp, tread	None Detected	Non-Friable	
715-27	Tarpaper, black	Exterior, siding, under plywood	None Detected	Non-Friable	
715-28	Tarpaper, black	Exterior, siding, under plywood	None Detected	Non-Friable	
715-29	Gypsum board only	Exterior, siding, under plywood	None Detected	Non-Friable	
715-30	Gypsum board only	Exterior, siding, under plywood	None Detected	Non-Friable	
715-31	Post base, concrete, gray	Exterior, ramp	None Detected	Non-Friable	
715-32	Pier block, concrete, gray	Exterior, foundation	None Detected	Non-Friable	
715-33	Concrete, gray	Exterior, stair landing	None Detected	Non-Friable	

TABLE 1
SUMMARY OF ASBESTOS ANALYTIC DATA

Garberville Library
715 Cedar Street
Garberville, CA

Sample Number	Sample Description (each layer)	Location	Asbestos % and Type	Friable vs. Non-Friable	Comments
715-34	Asphalt, black	Exterior, parking lot	None Detected	Non-Friable	
715-35	Concrete, gray	Exterior, ramp	None Detected	Non-Friable	
715-36	Asphalt, black	Exterior, parking lot	None Detected	Non-Friable	
715-37	Concrete, gray	Exterior, stair landing	None Detected	Non-Friable	
715-38	CMU pier block, gray	Exterior, foundation	None Detected	Non-Friable	
715-39	CMU pier block, gray	Exterior, foundation	None Detected	Non-Friable	
715-40	Pier base, concrete, gray	Exterior, foundation	None Detected	Non-Friable	
715-41	Roofing, torch down comp, gray	Roof, main membrane	None Detected	Non-Friable	
2 nd layer	Black tarpaper	‘	None Detected	Non-Friable	
715-42	Roofing, torch down comp, gray	Roof, main membrane	None Detected	Non-Friable	
2 nd layer	Black tarpaper	‘	None Detected	Non-Friable	
715-43	Roofing, torch down comp, gray	Roof, main membrane	None Detected	Non-Friable	
2 nd layer	Black tarpaper	‘	None Detected	Non-Friable	
715-44	Tar roof patch, gray-black	Roof, septic vent	None Detected	Non-Friable	
715-45	Tar roof patch, gray-black	Roof, septic vent	3% CH	Non-Friable	
715-46	Tar roof patch, gray-black	Roof, drain	PACM	Non-Friable	NA/PS
715-47	Tar roof patch, gray-black	Roof, drain	PACM	Non-Friable	NA/PS
715-48	Tar roof patch, gray-black	Roof, exhaust vent	PACM	Non-Friable	NA/PS

TABLE 1
SUMMARY OF ASBESTOS ANALYTIC DATA

Garberville Library
715 Cedar Street
Garberville, CA

Sample Number	Sample Description (each layer)	Location	Asbestos % and Type	Friable vs. Non-Friable	Comments
715-49	Tar roof patch, gray-black	Roof, patch on main membrane	PACM	Non-Friable	NA/PS
715-50	Silver paint	Roof, drain cap	None Detected	Non-Friable	
715-51	Silver paint	Roof, drain cap	None Detected	Non-Friable	
715-52	Caulking, black	Roof, parapet wall, seam on metal cap	None Detected	Non-Friable	
715-53	Roofing, brown comp shingle	Roof, fascia	None Detected	Non-Friable	
715-54	Roofing, brown comp shingle	Roof, fascia	None Detected	Non-Friable	
715-55	Tarpaper, black	Roof, fascia	None Detected	Non-Friable	
715-56	Tarpaper, black	Roof, fascia	None Detected	Non-Friable	

CH = Chrysotile asbestos CR = Crocidolite asbestos AM = Amosite asbestos

TR = Tremolite AN = Anthophyllite AC = Actinolite

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

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

PACM= Presumed ACM

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

<1% CH* = Trace amount, less than 1% asbestos, as visually estimated by initial PLM. Requires verification by more accurate point count analyses

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

Bold Type = materials found to contain asbestos

Note: Some samples had multiple layers analyzed separately

**TABLE 3
XRF PAINT SAMPLING DATA**

**Garberville Library
715 Cedar Street
Garberville, 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 mg/cm^2 to 1.2 mg/cm^2
Note: for Performance Characteristic Sheet (PCS) compliance, the average of three calibration readings must fall within the “Response Verification Check Range.”

Reading #	Sample Location	Component Description	Lead Concentration (mg/cm ²)	Paint Classification	Surface Coating Material	Color	Substrate
1	Calibration	Standard Reference Material	0.9	--	--	--	--
2	Calibration	Standard Reference Material	0.9	--	--	--	--
3	Calibration	Standard Reference Material	0.9	--	--	--	--
4	Kitchen	Wall	0.0	NEG	Paint	Pink-white	Drywall
5	Main room	Wall	0.1	LCSC	Paint	Pink-white	Drywall
6	Main room	Wall	0.1	LCSC	Paint	Pink-white	Drywall

NEG = Negative (<0.1 mg/cm²)

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**

**Garberville Library
715 Cedar Street
Garberville, CA**

Reading #	Sample Location	Component Description	Lead Concentration (mg/cm²)	Paint Classification	Surface Coating Material	Color	Substrate
7	Men's RR	Wall	0.0	NEG	Paint	Pink-white	Drywall
8	Men's RR	Wall panel	0.1	LCSC	Paint	Tan	Wood
9	Kitchen	Cabinet	0.0	NEG	Stain	Brown	Wood
10	Women's RR	Door	-0.1	NEG	Stain	Brown	Wood
11	Women's RR	Door jamb	0.0	NEG	Paint	Brown	Metal
12	Main room	Door	-0.1	NEG	Paint	Brown	Metal
13	Main room	Door jamb/trim	0.1	LCSC	Paint	Brown	Metal
14	Main room	Drinking fountain	0.8	LCSC	Glaze	White	Ceramic
15	Kitchen	Sink	0.0	NEG	Glaze	White	Metal
16	Women's RR	Toilet	-0.4	NEG	Glaze	White	Ceramic
17	Women's RR	Sink	-0.4	NEG	Glaze	White	Ceramic
18	Men's RR	Sink	-0.3	NEG	Glaze	White	Ceramic
19	Men's RR	Toilet	-0.2	NEG	Glaze	White	Ceramic
20	Exterior	Soffit	-0.1	NEG	Paint	Brown	Wood

NEG = Negative (<0.1 mg/cm²)

LCSC = Lead Containing Surface Coating (≥ 0.1 mg/cm² & <1.0 mg/cm²)

LBP=Lead Based Paint (≥1.0 mg/cm²)

**TABLE 3
XRF PAINT SAMPLING DATA**

Garberville Library
715 Cedar Street
Garberville, CA

Reading #	Sample Location	Component Description	Lead Concentration (mg/cm ²)	Paint Classification	Surface Coating Material	Color	Substrate
21	Exterior	Siding	-0.2	NEG	Paint	Brown	Wood
22	Exterior	Deck railing	-0.2	NEG	Paint	Brown	Wood
23	Exterior	Deck railing	-0.3	NEG	Paint	Green	Wood
24	Exterior	Deck railing picket	-0.3	NEG	Paint	Tan	Wood
25	Exterior	Siding	-0.1	NEG	Paint	Tan	Wood
26	Exterior	Siding trim	-0.1	NEG	Paint	Tan	Wood
27	Exterior	Down spout	0.2	LCSC	Paint	Tan	Metal
28	Exterior	Railing	0.1	LCSC	Paint	Brown	Metal
29	Exterior	Railing	0.2	LCSC	Paint	Blue	Metal
30	Exterior	Siding	-0.1	NEG	Paint	Tan	Wood
31	Calibration	Standard Reference Material	0.8	--	--	--	--
32	Calibration	Standard Reference Material	0.9	--	--	--	--
33	Calibration	Standard Reference Material	0.7	--	--	--	--

NEG = Negative (<0.1 mg/cm²)

LCSC = Lead Containing Surface Coating (≥ 0.1 mg/cm² & <1.0 mg/cm²)

LBP=Lead Based Paint (≥1.0 mg/cm²)

**TABLE 4
LEAD WASTE CHARACTERIZATION**

**Garberville Library
715 Cedar Street, Garberville, CA**

SAMPLE ID	TTLIC for Lead mg/kg (ppm)	STLC for Lead mg/L	TCLP for Lead mg/L	Disposal Requirements
<p style="text-align: center;">GL- LWA Anticipated demolition waste stream* for Garberville Library building</p>	<20 mg/kg (ppm)	Not required as TTLIC was <50 mg/kg (ppm)	0.11 mg/L	Non-Hazardous Waste, dispose as "General Construction Debris" at a Class 3 landfill

* Excluding any Asbestos Containing Materials (ACM)

TTLIC = Total Threshold Concentration Limit, by EPA 3050B/7000B (California initial test)

TTLIC results of: $\geq 1,000$ mg/kg lead content are considered hazardous waste by California standards (22 CCR 66261.24)

STLC = Soluble Threshold Limit Concentration (California waste "wet" test), by EPA 3010A/6010C

STLC results of: ≥ 5.0 mg/L lead content are considered hazardous waste by California standards (22 CCR 66261.24)

TCLP = Toxicity Characterization Leaching Procedure (Federal waste "wet" test), by SW-846 1311 EPA 3010A/7000B

TCLP results of: ≥ 5.0 mg/L lead content are considered hazardous waste by federal standards (40 CFR 261.24),
and by California standards (22 CCR 66261.24)

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



AmeriSci Los Angeles

24416 S. Main Street, Ste 308
Carson, California 90745
TEL: (310) 834-4868 • FAX: (310) 834-4772

PLM Bulk Asbestos Report

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

Arcata, CA 95518

Date Received 05/06/19 **AmeriSci Job #** 919051121
Date Examined 05/08/19 **P.O. #**
Page 1 of 12
RE: 1900203; Garberville Library; 715 Cedar St. Garberville, CA

Client No. / HGA	Lab No.	Asbestos Present	Total % Asbestos
715-1 Location: CP (2x4), White & Yellow Fiberglass / KN / Drop Ceiling	919051121-01	No	NAD (by CVES) by Arturo A. Aldana on 05/08/19
Analyst Description: White/Yellow, Homogeneous, Fibrous, Ceiling Panel Asbestos Types: Other Material: Fibrous glass 70 %, Non-fibrous 30 %			
715-2 Location: JC/GB / M. RR / Wall	919051121-02.1	No	NAD (by CVES) by Arturo A. Aldana on 05/09/19
Analyst Description: White, Homogeneous, Non-Fibrous, Joint Compound Asbestos Types: Other Material: Non-fibrous 100 %			
715-2 Location: JC/GB / M. RR / Wall	919051121-02.2	No	NAD (by CVES) by Arturo A. Aldana on 05/09/19
Analyst Description: White/Brown/Beige, Heterogeneous, Fibrous, Gypsum Board/Tape Asbestos Types: Other Material: Cellulose 8 %, Fibrous glass Trace, Non-fibrous 92 %			
715-3 Location: JC/GB / KN / Wall	919051121-03.1	No	NAD (by CVES) by Arturo A. Aldana on 05/09/19
Analyst Description: White, Homogeneous, Non-Fibrous, Joint Compound Asbestos Types: Other Material: Non-fibrous 100 %			
715-3 Location: JC/GB / KN / Wall	919051121-03.2	No	NAD (by CVES) by Arturo A. Aldana on 05/09/19
Analyst Description: White/Brown/Beige, Heterogeneous, Fibrous, Gypsum Board/Tape Asbestos Types: Other Material: Cellulose 4 %, Fibrous glass Trace, Non-fibrous 96 %			

Client Name: Brunelle & Clark Consulting, LLC

PLM Bulk Asbestos Report

1900203; Garberville Library; 715 Cedar St. Garberville, CA

Client No. / HGA	Lab No.	Asbestos Present	Total % Asbestos
715-4 Location: JC/GB / Main RR / Wall	919051121-04.1	No	NAD (by CVES) by Arturo A. Aldana on 05/09/19
Analyst Description: White, Homogeneous, Non-Fibrous, Joint Compound			
Asbestos Types:			
Other Material: Non-fibrous 100 %			
715-4 Location: JC/GB / Main RR / Wall	919051121-04.2	No	NAD (by CVES) by Arturo A. Aldana on 05/09/19
Analyst Description: White/Brown/Beige, Heterogeneous, Fibrous, Gypsum Board/Tape			
Asbestos Types:			
Other Material: Cellulose 4 %, Fibrous glass Trace, Non-fibrous 96 %			
715-5 Location: JC/GB / Main RR / Wall	919051121-05.1	No	NAD (by CVES) by Arturo A. Aldana on 05/09/19
Analyst Description: White, Homogeneous, Non-Fibrous, Joint Compound			
Asbestos Types:			
Other Material: Non-fibrous 100 %			
715-5 Location: JC/GB / Main RR / Wall	919051121-05.2	No	NAD (by CVES) by Arturo A. Aldana on 05/09/19
Analyst Description: White/Brown/Beige, Heterogeneous, Fibrous, Gypsum Board/Tape			
Asbestos Types:			
Other Material: Cellulose 4 %, Fibrous glass Trace, Non-fibrous 96 %			
715-6 Location: JC/GB / Main RR / Wall	919051121-06.1	No	NAD (by CVES) by Arturo A. Aldana on 05/09/19
Analyst Description: White, Homogeneous, Non-Fibrous, Joint Compound			
Asbestos Types:			
Other Material: Non-fibrous 100 %			
715-6 Location: JC/GB / Main RR / Wall	919051121-06.2	No	NAD (by CVES) by Arturo A. Aldana on 05/09/19
Analyst Description: White/Brown/Beige, Heterogeneous, Fibrous, Gypsum Board/Tape			
Asbestos Types:			
Other Material: Cellulose 5 %, Fibrous glass Trace, Non-fibrous 95 %			

Client Name: Brunelle & Clark Consulting, LLC

PLM Bulk Asbestos Report

1900203; Garberville Library; 715 Cedar St. Garberville, CA

Client No. / HGA	Lab No.	Asbestos Present	Total % Asbestos
715-7 Location: JC/GB / KN / Wall	919051121-07.1	No	NAD (by CVES) by Arturo A. Aldana on 05/09/19
Analyst Description: White, Homogeneous, Non-Fibrous, Joint Compound Asbestos Types: Other Material: Non-fibrous 100 %			
715-7 Location: JC/GB / KN / Wall	919051121-07.2	No	NAD (by CVES) by Arturo A. Aldana on 05/09/19
Analyst Description: White/Brown, Homogeneous, Fibrous, Gypsum Board Asbestos Types: Other Material: Cellulose 5 %, Fibrous glass Trace, Non-fibrous 95 %			
715-8 Location: JC Only / Main RR / Wall	919051121-08	No	NAD (by CVES) by Arturo A. Aldana on 05/09/19
Analyst Description: White, Homogeneous, Non-Fibrous, Joint Compound Asbestos Types: Other Material: Non-fibrous 100 %			
715-9 3 Location: Texture, Skip Trowel / Main Rm. / Wall	919051121-09	No	NAD (by CVES) by Arturo A. Aldana on 05/09/19
Analyst Description: White, Homogeneous, Non-Fibrous, Texture Asbestos Types: Other Material: Non-fibrous 100 %			
715-10 3 Location: Texture, Skip Trowel / Main Rm. / Wall	919051121-10	No	NAD (by CVES) by Arturo A. Aldana on 05/09/19
Analyst Description: White, Homogeneous, Non-Fibrous, Texture Asbestos Types: Other Material: Non-fibrous 100 %			
715-11 3 Location: Texture, Skip Trowel / Main Rm. / Wall	919051121-11	No	NAD (by CVES) by Arturo A. Aldana on 05/09/19
Analyst Description: White, Homogeneous, Non-Fibrous, Texture Asbestos Types: Other Material: Non-fibrous 100 %			

Client Name: Brunelle & Clark Consulting, LLC

PLM Bulk Asbestos Report

1900203; Garberville Library; 715 Cedar St. Garberville, CA

Client No. / HGA	Lab No.	Asbestos Present	Total % Asbestos
715-12 3	919051121-12 Location: Texture, Skip Trowel / W. RR / Wall	No	NAD (by CVES) by Arturo A. Aldana on 05/09/19
Analyst Description: White, Homogeneous, Non-Fibrous, Texture Asbestos Types: Other Material: Non-fibrous 100 %			
715-13 4	919051121-13 Location: Texture, Skip Trowel / KN / Wall	No	NAD (by CVES) by Arturo A. Aldana on 05/09/19
Analyst Description: White, Homogeneous, Non-Fibrous, Texture Asbestos Types: Other Material: Non-fibrous 100 %			
715-14 4	919051121-14 Location: Door Core, Brown Cardboard / Main Rm. / East Entry / Door Fill	No	NAD (by CVES) by Arturo A. Aldana on 05/09/19
Analyst Description: Brown, Homogeneous, Fibrous, Cardboard Asbestos Types: Other Material: Cellulose 70 %, Non-fibrous 30 %			
715-15	919051121-15 Location: Door Core, Brown Cardboard / Main Rm. / East Entry / Door Fill	No	NAD (by CVES) by Arturo A. Aldana on 05/09/19
Analyst Description: Brown, Homogeneous, Fibrous, Cardboard Asbestos Types: Other Material: Cellulose 70 %, Non-fibrous 30 %			
715-16	919051121-16 Location: Baseboard Mastic, Tan / Main Rm. / Vinyl Baseboard	No	NAD (by CVES) by Arturo A. Aldana on 05/09/19
Analyst Description: Off-White, Homogeneous, Non-Fibrous, Mastic Asbestos Types: Other Material: Non-fibrous 100 %			
715-17	919051121-17 Location: Baseboard Mastic, Tan / KN / Vinyl Baseboard	No	NAD (by CVES) by Arturo A. Aldana on 05/09/19
Analyst Description: Off-White, Homogeneous, Non-Fibrous, Mastic Asbestos Types: Other Material: Non-fibrous 100 %			

PLM Bulk Asbestos Report

1900203; Garberville Library; 715 Cedar St. Garberville, CA

Client No. / HGA	Lab No.	Asbestos Present	Total % Asbestos
715-18 Location: Baseboard Mastic, Tan / M. RR / Vinyl Baseboard	919051121-18	No	NAD (by CVES) by Arturo A. Aldana on 05/09/19
Analyst Description: Off-White, Homogeneous, Non-Fibrous, Mastic			
Asbestos Types:			
Other Material: Non-fibrous 100 %			
715-19 Location: Carpet Glue, Yellow / Main Rm. / Floor / Under Carpet	919051121-19	No	NAD (by CVES) by Arturo A. Aldana on 05/09/19
Analyst Description: Yellow, Homogeneous, Non-Fibrous, Glue			
Asbestos Types:			
Other Material: Non-fibrous 100 %			
715-20 Location: Carpet Glue, Yellow / KN / Floor / Under Carpet	919051121-20	No	NAD (by CVES) by Arturo A. Aldana on 05/09/19
Analyst Description: Yellow, Homogeneous, Non-Fibrous, Glue			
Asbestos Types:			
Other Material: Non-fibrous 100 %			
715-21 7 Location: SF, Tan Mosaic / Tan Glue / M. RR / Floor	919051121-21L1	No	NAD (by CVES) by Arturo A. Aldana on 05/09/19
Analyst Description: Off-White/Tan, Homogeneous, Fibrous, Sheet Flooring			
Asbestos Types:			
Other Material: Cellulose 5 %, Fibrous glass 2 %, Synthetic fibers 3 %, Non-fibrous 90 %			
715-21 7 Location: SF, Tan Mosaic / Tan Glue / M. RR / Floor	919051121-21L2	No	NAD (by CVES) by Arturo A. Aldana on 05/09/19
Analyst Description: Tan, Homogeneous, Non-Fibrous, Glue			
Asbestos Types:			
Other Material: Non-fibrous 100 %			
715-22 7 Location: SF, Tan Mosaic / Tan Glue / Hall / Closet / Floor	919051121-22L1	No	NAD (by CVES) by Arturo A. Aldana on 05/09/19
Analyst Description: Off-White/Tan, Homogeneous, Fibrous, Sheet Flooring			
Asbestos Types:			
Other Material: Cellulose 5 %, Fibrous glass 2 %, Synthetic fibers 3 %, Non-fibrous 90 %			

Client Name: Brunelle & Clark Consulting, LLC

PLM Bulk Asbestos Report

1900203; Garberville Library; 715 Cedar St. Garberville, CA

Client No. / HGA	Lab No.	Asbestos Present	Total % Asbestos
715-22 7	919051121-22L2 Location: SF, Tan Mosaic / Tan Glue / Hall / Closet / Floor	No	NAD (by CVES) by Arturo A. Aldana on 05/09/19
Analyst Description: Beige, Homogeneous, Non-Fibrous, Glue Asbestos Types: Other Material: Non-fibrous 100 %			
715-23 7	919051121-23L1 Location: SF, Tan Mosaic / Tan Glue / Main Rm. / Entry / Floor	No	NAD (by CVES) by Arturo A. Aldana on 05/09/19
Analyst Description: Off-White/Tan, Homogeneous, Fibrous, Sheet Flooring Asbestos Types: Other Material: Cellulose 5 %, Fibrous glass 2 %, Synthetic fibers 3 %, Non-fibrous 90 %			
715-23 7	919051121-23L2 Location: SF, Tan Mosaic / Tan Glue / Main Rm. / Entry / Floor	No	NAD (by CVES) by Arturo A. Aldana on 05/09/19
Analyst Description: Tan, Homogeneous, Non-Fibrous, Glue Asbestos Types: Other Material: Non-fibrous 100 %			
715-24	919051121-24 Location: Leveling Compound, Gray / Ext. Ramp / Under Roll Comp	No	NAD (by CVES) by Arturo A. Aldana on 05/09/19
Analyst Description: Grey, Homogeneous, Non-Fibrous, Leveling Compound Asbestos Types: Other Material: Non-fibrous 100 %			
715-25	919051121-25 Location: Roofing, Brown Roll Comp. / Ext. / Ramp / Tread	No	NAD (by CVES) by Arturo A. Aldana on 05/09/19
Analyst Description: Black/Brown, Homogeneous, Fibrous, Roofing Asbestos Types: Other Material: Cellulose 10 %, Non-fibrous 90 %			
715-26	919051121-26 Location: Roofing, Brown Roll Comp. / Ext. / Ramp / Tread	No	NAD (by CVES) by Arturo A. Aldana on 05/09/19
Analyst Description: Black/Brown, Homogeneous, Fibrous, Roofing Asbestos Types: Other Material: Cellulose 10 %, Non-fibrous 90 %			

Client Name: Brunelle & Clark Consulting, LLC

PLM Bulk Asbestos Report

1900203; Garberville Library; 715 Cedar St. Garberville, CA

Client No. / HGA	Lab No.	Asbestos Present	Total % Asbestos
715-27	919051121-27	No	NAD
Location: Tar Paper, Black / Ext. Siding / Under Plywood			(by CVES) by Arturo A. Aldana on 05/09/19
Analyst Description: Black, Homogeneous, Fibrous, Tar Paper			
Asbestos Types:			
Other Material: Cellulose 60 %, Non-fibrous 40 %			
715-28	919051121-28	No	NAD
Location: Tar Paper, Black / Ext. Siding / Under Plywood			(by CVES) by Arturo A. Aldana on 05/09/19
Analyst Description: Black, Homogeneous, Fibrous, Tar Paper			
Asbestos Types:			
Other Material: Cellulose 60 %, Non-fibrous 40 %			
715-29	919051121-29	No	NAD
Location: GB Only / Ext. Siding / Under Plywood			(by CVES) by Arturo A. Aldana on 05/09/19
Analyst Description: White/Brown, Homogeneous, Fibrous, Gypsum Board			
Asbestos Types:			
Other Material: Cellulose 6 %, Fibrous glass Trace, Non-fibrous 94 %			
715-30	919051121-30	No	NAD
Location: GB Only / Ext. Siding / Under Plywood			(by CVES) by Arturo A. Aldana on 05/09/19
Analyst Description: White/Brown, Homogeneous, Fibrous, Gypsum Board			
Asbestos Types:			
Other Material: Cellulose 6 %, Fibrous glass Trace, Non-fibrous 94 %			
715-31	919051121-31	No	NAD
Location: Post Base, Gray Concrete / Ext. / Ramp.			(by CVES) by Arturo A. Aldana on 05/09/19
Analyst Description: Grey, Homogeneous, Non-Fibrous, Cementitious, Concrete			
Asbestos Types:			
Other Material: Non-fibrous 100 %			
715-32	919051121-32	No	NAD
Location: Pier Block, Gray Concrete / Ext. / Foundation			(by CVES) by Arturo A. Aldana on 05/09/19
Analyst Description: Grey, Homogeneous, Non-Fibrous, Cementitious, Concrete			
Asbestos Types:			
Other Material: Non-fibrous 100 %			

Client Name: Brunelle & Clark Consulting, LLC

PLM Bulk Asbestos Report

1900203; Garberville Library; 715 Cedar St. Garberville, CA

Client No. / HGA	Lab No.	Asbestos Present	Total % Asbestos
715-33 Location: Concrete, Gray / Ext. Stair Landing	919051121-33	No	NAD (by CVES) by Arturo A. Aldana on 05/09/19
Analyst Description: Grey, Homogeneous, Non-Fibrous, Cementitious, Concrete			
Asbestos Types:			
Other Material: Non-fibrous 100 %			
715-34 Location: Asphalt, Black / Ext. Parking Lot	919051121-34	No	NAD (by CVES) by Arturo A. Aldana on 05/09/19
Analyst Description: Black, Homogeneous, Non-Fibrous, Cementitious, Asphalt			
Asbestos Types:			
Other Material: Non-fibrous 100 %			
715-35 Location: Concrete, Gray / Ext. / Ramp	919051121-35	No	NAD (by CVES) by Arturo A. Aldana on 05/09/19
Analyst Description: Grey, Homogeneous, Non-Fibrous, Cementitious, Concrete			
Asbestos Types:			
Other Material: Non-fibrous 100 %			
715-36 Location: Asphalt, Black / Ext. Parking Lot	919051121-36	No	NAD (by CVES) by Arturo A. Aldana on 05/09/19
Analyst Description: Black, Homogeneous, Non-Fibrous, Cementitious, Asphalt			
Asbestos Types:			
Other Material: Non-fibrous 100 %			
715-37 Location: Concrete, Gray / Ext. Stair Landing	919051121-37	No	NAD (by CVES) by Arturo A. Aldana on 05/09/19
Analyst Description: Grey, Homogeneous, Non-Fibrous, Cementitious, Concrete			
Asbestos Types:			
Other Material: Non-fibrous 100 %			
715-38 Location: CMU Pier Block, Gray / Ext. Foundation	919051121-38	No	NAD (by CVES) by Arturo A. Aldana on 05/09/19
Analyst Description: Grey/Brown, Homogeneous, Non-Fibrous, Cementitious, CMU			
Asbestos Types:			
Other Material: Non-fibrous 100 %			

Client Name: Brunelle & Clark Consulting, LLC

PLM Bulk Asbestos Report

1900203; Garberville Library; 715 Cedar St. Garberville, CA

Client No. / HGA	Lab No.	Asbestos Present	Total % Asbestos
715-39 Location: CMU Pier Block, Gray / Ext. Foundation	919051121-39	No	NAD (by CVES) by Arturo A. Aldana on 05/09/19
Analyst Description: Grey/Brown, Homogeneous, Non-Fibrous, Cementitious, CMU Asbestos Types: Other Material: Non-fibrous 100 %			
715-40 Location: Pier Base, Gray Concrete / Ext. Foundation	919051121-40	No	NAD (by CVES) by Arturo A. Aldana on 05/09/19
Analyst Description: Grey, Homogeneous, Non-Fibrous, Cementitious, Concrete Asbestos Types: Other Material: Non-fibrous 100 %			
715-41 Location: Roofing, Gray Torch Down Comp. / Blk Tar Paper / Roof / Main Membrane	919051121-41L1	No	NAD (by CVES) by Arturo A. Aldana on 05/09/19
Analyst Description: Black/Grey, Homogeneous, Non-Fibrous, Roofing Asbestos Types: Other Material: Synthetic fibers 10 %, Non-fibrous 90 %			
715-41 Location: Roofing, Gray Torch Down Comp. / Blk Tar Paper / Roof / Main Membrane	919051121-41L2	No	NAD (by CVES) by Arturo A. Aldana on 05/09/19
Analyst Description: Black, Homogeneous, Non-Fibrous, Tar Paper Asbestos Types: Other Material: Fibrous glass 3 %, Non-fibrous 97 %			
715-42 Location: Roofing, Gray Torch Down Comp. / Blk Tar Paper / Roof / Main Membrane	919051121-42L1	No	NAD (by CVES) by Arturo A. Aldana on 05/09/19
Analyst Description: Black/Grey, Homogeneous, Non-Fibrous, Roofing Asbestos Types: Other Material: Synthetic fibers 10 %, Non-fibrous 90 %			
715-42 Location: Roofing, Gray Torch Down Comp. / Blk Tar Paper / Roof / Main Membrane	919051121-42L2	No	NAD (by CVES) by Arturo A. Aldana on 05/09/19
Analyst Description: Black, Homogeneous, Non-Fibrous, Tar Paper Asbestos Types: Other Material: Fibrous glass 3 %, Non-fibrous 97 %			

Client Name: Brunelle & Clark Consulting, LLC

PLM Bulk Asbestos Report

1900203; Garberville Library; 715 Cedar St. Garberville, CA

Client No. / HGA	Lab No.	Asbestos Present	Total % Asbestos
715-43	919051121-43L1	No	NAD
Location: Roofing, Gray Torch Down Comp. / Blk Tar Paper / Roof / Main Membrane			(by CVES) by Arturo A. Aldana on 05/09/19
Analyst Description: Black/Grey, Homogeneous, Non-Fibrous, Roofing Asbestos Types: Other Material: Synthetic fibers 10 %, Non-fibrous 90 %			
715-43	919051121-43L2	No	NAD
Location: Roofing, Gray Torch Down Comp. / Blk Tar Paper / Roof / Main Membrane			(by CVES) by Arturo A. Aldana on 05/09/19
Analyst Description: Black, Homogeneous, Non-Fibrous, Tar Paper Asbestos Types: Other Material: Fibrous glass 3 %, Non-fibrous 97 %			
715-44	919051121-44	No	NAD
19	Location: Tar Roof Patch, Gray - Black / Roof / Septic Vent		(by CVES) by Arturo A. Aldana on 05/09/19
Analyst Description: Black/Grey, Homogeneous, Non-Fibrous, Roofing Patch Asbestos Types: Other Material: Cellulose 5 %, Non-fibrous 95 %			
715-45	919051121-45	Yes	3 %
19	Location: Tar Roof Patch, Gray - Black / Roof / Drain		(by CVES) by Arturo A. Aldana on 05/09/19
Analyst Description: Black/Grey, Homogeneous, Non-Fibrous, Roofing Patch Asbestos Types: Chrysotile 3.0 % Other Material: Non-fibrous 97 %			
715-46	919051121-46		NA/PS
19	Location: Tar Roof Patch, Gray - Black / Roof / Drain		
Analyst Description: Roofing Patch Asbestos Types: Other Material:			
715-47	919051121-47		NA/PS
19	Location: Tar Roof Patch, Gray - Black / Roof / Exhaust Vent		
Analyst Description: Roofing Patch Asbestos Types: Other Material:			

Client Name: Brunelle & Clark Consulting, LLC

PLM Bulk Asbestos Report

1900203; Garberville Library; 715 Cedar St. Garberville, CA

Client No. / HGA	Lab No.	Asbestos Present	Total % Asbestos
715-48 19	919051121-48 Location: Tar Roof Patch, Gray - Black / Roof / Patch On Main Membrane		NA/PS
Analyst Description: Roofing Patch Asbestos Types: Other Material:			
715-49 19	919051121-49 Location: Tar Roof Patch, Gray - Black / Roof / Patch On Main Membrane		NA/PS
Analyst Description: Roofing Patch Asbestos Types: Other Material:			
715-50 20	919051121-50 Location: Silver Paint / Roof / Drain Cap	No	NAD (by CVES) by Arturo A. Aldana on 05/09/19
Analyst Description: Silver, Homogeneous, Non-Fibrous, Paint Asbestos Types: Other Material: Cellulose 3 %, Non-fibrous 97 %			
715-51 20	919051121-51 Location: Silver Paint / Roof / Drain Cap	No	NAD (by CVES) by Arturo A. Aldana on 05/09/19
Analyst Description: Silver, Homogeneous, Non-Fibrous, Paint Asbestos Types: Other Material: Cellulose 3 %, Non-fibrous 97 %			
715-52	919051121-52 Location: Caulking, Black / Roof / Parapet Wall / Seam On Metal Cap	No	NAD (by CVES) by Arturo A. Aldana on 05/09/19
Analyst Description: Black, Homogeneous, Non-Fibrous, Caulking Asbestos Types: Other Material: Non-fibrous 100 %			
715-53	919051121-53 Location: Roofing, Bown Comp. Shingle / Roof / Fascia	No	NAD (by CVES) by Arturo A. Aldana on 05/09/19
Analyst Description: Black/Grey/Brown, Homogeneous, Fibrous, Roofing Asbestos Types: Other Material: Fibrous glass 5 %, Non-fibrous 95 %			

Client Name: Brunelle & Clark Consulting, LLC

PLM Bulk Asbestos Report

1900203; Garberville Library; 715 Cedar St. Garberville, CA

Client No. / HGA	Lab No.	Asbestos Present	Total % Asbestos
715-54 Location: Roofing, Bown Comp. Shingle / Roof / Fascia	919051121-54	No	NAD (by CVES) by Arturo A. Aldana on 05/09/19
Analyst Description: Black/Grey/Brown, Homogeneous, Fibrous, Roofing Asbestos Types: Other Material: Fibrous glass 8 %, Non-fibrous 92 %			
715-55 Location: Tarpaper, Black / Roof / Fascia	919051121-55	No	NAD (by CVES) by Arturo A. Aldana on 05/09/19
Analyst Description: Black, Homogeneous, Fibrous, Tar Paper Asbestos Types: Other Material: Cellulose 60 %, Non-fibrous 40 %			
715-56 Location: Tarpaper, Black / Roof / Fascia	919051121-56	No	NAD (by CVES) by Arturo A. Aldana on 05/09/19
Analyst Description: Black, Homogeneous, Fibrous, Tar Paper Asbestos Types: Other Material: Cellulose 60 %, Non-fibrous 40 %			

Reporting Notes:

Analyzed By: Arturo A. Aldana at aod; Date Analyzed: 5/8/2019 5/9/19
 *NAD = no asbestos detected; Detection Limit <1%; Reporting Limits: CVES = 1%, 400 Pt Ct = 0.25%, 1000 Pt Ct = 0.1%; NA = not analyzed; NA/PS = not analyzed / positive stop; NVA = No Visible Asbestos; PLM (polarized light microscopy) Bulk Asbestos Analysis by EPA 600/R-93/116, including requirements for EPA 600/M4-82-020 per 40 CFR 763 (NVLAP Lab #200346-0); Note: PLM is not consistently reliable in detecting asbestos in floor coverings and similar NOB materials. 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 with the approval of the laboratory. This PLM report relates ONLY to the items tested.

Reviewed By: at aod

919051121

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/ <u>3-days</u> /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: 4/29/19 Site: Garberville Library 715 Cedar St. Garberville, CA Proj. # 1900203
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BULK ASBESTOS SAMPLING

Sample No.	Sample Description	Hom. Area	Location	Mat'l Type	Friability
715-1	CP(2x4), white & yellow fiberglass	1	KN / Drop ceiling	MM	F
-2	JC/GB	2	M. RR / wall		WF
-3		2	KN /		
-4		2	Main Rm. /		
-5		2	/		
-6		2	↓ / ↓		
-7		2	KN / wall		
-8	JC only	2	Main Rm. / wall		
-9	Texture, skip trowel	3	Main Rm. / wall	SM	
-10		3	↓ / ↓		
-11		3	↓ / ↓		
-12		3	W. RR / ↓		
-13		3	KN / ↓		
-14	Door Core, Brown cardboard	4	Main Rm. / East Entry / door fill	MM	
-15		4	↓ / ↓ / ↓		

Sample Abbreviations

Hom. Area = Homogenous Area
 VFT = Vinyl Floor Tile
 SF = Sheet Flooring
 JC/GB = Joint Compound/Gypsum Board

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

Material Type

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

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

Sampled by: Zindar Brunelle Relinquished by: Zindar Brunelle Date/Time: 5/4/19	Received by: [Signature] Signature: [Signature] Date/Time: 5/6/19 @ 10:20
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19051121

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: 4/29/19 Site: Garberville Library 715 Cedar St. Garberville, CA Proj. # 1900203
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BULK ASBESTOS SAMPLING

Sample No.	Sample Description	Hom. Area	Location	Mat'l Type	Friability
715-16	Baseboard mastic, tan	5	Main Rm. / vinyl baseboard	MM	NF
-17	↓	5	KN / ↓		↓
-18	↓	5	M.RR / ↓		↓
-19	Carpet glue, yellow	6	Main Rm. / floor / under carpet		↓
-20	↓	6	KN / ↓ ↓		↓
-21	SF, tan mosaic / tan glue	7	M.RR / Floor		F
-22	↓	7	Hall / closet / Floor		↓
-23	↓	7	Main Rm. / Entry / Floor		↓
-24	Leveling compound, gray	8	Ext. / Ramp / under roll comp		NF
-25	Brown Roofing, roll comp.	9	/ / Tread		↓
-26	↓	9	/ ↓ / ↓		↓
-27	Tarpaper, black	10	/ siding / under plywood		↓
-28	↓	10	/ ↓ / ↓		↓
-29	GB Only	11	/ / under plywood		↓
-30	↓	11	↓ / ↓ ↓		↓

Sample Abbreviations

Hom. Area = Homogenous Area
 VFT = Vinyl Floor Tile
 SF = Sheet Flooring
 JC/GB = Joint Compound/Gypsum Board

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

Material Type

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

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

Sampled by: Zindar Brunelle Relinquished by: Zindar Brunelle Date/Time: 5/4/19	Received by: [Signature] Signature: [Signature] Date/Time: 5/6/19 10:20
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919051121

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: 4/29/19 Site: Garberville Library 715 Cedar St. Garberville, CA Proj. # 1900203
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BULK ASBESTOS SAMPLING

Sample No.	Sample Description	Hom. Area	Location	Mat'l Type	Friability
715-31	Post Base, ^{gray} concrete	12	Ext. / Ramp	MM	NF
-32	Pier block, ^{gray} concrete	13	/ Foundation		
-33	Concrete, gray	14	/ stair Landing		
-34	Asphalt, black	15	/ Parking Lot		
-35	Concrete, gray	16	/ Ramp		
-36	Asphalt, black	15	/ Parking Lot		
-37	Concrete, gray	14	/ stair Landing		
-38	CMU Pier Block, gray	17	/ Foundation		
-39	↓	17	↓		
-40	Pier Base, ^{gray} concrete	13	↓ / ↓		
-41	Roofing, ^{gray} Torch down comp. / ^{BIK} Tar paper	18	Roof / main Membrane		
-42	↓	18	↓		
-43	↓	18	↓		
-44	Tar Roof Patch, gray-black	19	/ septic vent		
-45	↓	19	↓		

Sample Abbreviations

Hom. Area = Homogenous Area
 VFT = Vinyl Floor Tile
 SF = Sheet Flooring
 JC/GB = Joint Compound/Gypsum Board

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

Material Type

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

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

Sampled by: Zindar Brunelle Relinquished by: Zindar Brunelle Date/Time: 5/4/19	Received by: Assumti, Jan Signature: [Signature] Date/Time: 5/6/19 @ 10.20
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19051121

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/ <u>3-days</u> /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: 4/29/19 Site: Garberville Library 715 Cedar St. Garberville, CA Proj. # 1900203
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BULK ASBESTOS SAMPLING

Sample No.	Sample Description	Hom. Area	Location	Mat'l Type	Friability
715-46	Tar Roof Patch, gray-black	19	Roof / drain	mm	NF
- 47	↓	19	↓	↓	↓
- 48	↓	19	/ Exhaust vent	↓	↓
- 49	↓	19	/ Patch on main membrane	↓	↓
- 50	Silver paint	20	/ drain cap	↓	↓
- 51	↓	20	↓	↓	↓
- 52	Caulking, black	21	/ Parapet / seam on wall / metal cap	↓	↓
- 53	Roofing, comp. shingle ^{brown}	22	/ Fascia	↓	↓
- 54	↓	22	↓	↓	↓
- 55	Tarpaper, black	23	↓	↓	↓
↓ - 56	↓	23	↓	↓	↓

Sample Abbreviations

Hom. Area = Homogenous Area
 VFT = Vinyl Floor Tile
 SF = Sheet Flooring
 JC/GB = Joint Compound/Gypsum Board

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

Material Type

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

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

Sampled by: Zindar Brunelle Relinquished by: Zindar Brunelle Date/Time: 5/4/19	Received by: Pissanni Jones Signature: [Signature] Date/Time: 5/6/19 @ 10:20
--	--



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

Laboratory Report

Report Date: 5/8/2019
 Workorder No: 419051052

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

Attention: Zindar Brunelle

Subject: **1900203; Garberville Library, 715 Cedar St. Garberville, CA**

Sample 1: **GL-LWA** Description: Demolition Waste For Library Building
 Collection Date: 04/30/2019 Received Date: 5/7/2019 Time: 10:15
 Matrix: Solid

<u>Parameter</u>	<u>Method</u>	<u>Results</u>	<u>Unit</u>	<u>PQL</u>	<u>Tech</u>	<u>Analysis Date</u>	<u>Qual</u>
Lead, TTLC/Soil/Solid							
Lead, AAS	EPA Method 3050B/7000B	<20	mg/kg	20	TN	5/7/2019	
TCLP Extraction-Metals	SW-846 Method 1311				TN	5/7/2019	
Lead, TCLP, ICP	EPA 3010A/6010B	0.11	mg/L	0.10	MP	5/8/2019	

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

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

Authorized by/Title: _____
 Minh Phung / Metal Superv.

Date: 5/8/2019

COMPANY: BRUNELLE & CLARK CONSULTING, LLC
 ADDRESS: P.O. Box 1138, Arcata, CA 95518
 PHONE: (707) 822-4058 FAX 1: _____ CELL: (707) 672-5345
 CLIENT CONTACT: Zindar Brunelle EMAIL: zbconsult@outlook.com
 PROJECT NAME: Garberville Library, 715 Cedar St. Garberville, CA PROJECT NUMBER: 1900203 PROJECT STATE: CA
 MATRIX: A-WATER S-SOIL/SOLIDS SL-SLUDGE OIL-OIL CH-CHIPS CONTAINER: P-PLASTIC G-GLASS V-VOA
 WI-WIPES C-CASSETTES W-WASTE O-OTHER

LAB ID	CLIENT SAMPLE IDENTIFICATION	MATRIX	CONTAINER			SAMPLING INFORMATION			GRAB (G) OR COMPOSITE (C)	PRESERVATIVES	SAMPLE PH AT LOGIN	Notes:
			SIZE	TYPE	#	DATE	TIME	TECH				
GL-LWA	Demolition waste for Library Building	W	L	P	1	4/30/19	NA	<i>Zindar Brunelle</i>			X	198.75g



LEAD WASTE CHARACTERIZATION
 Homogenize the bulk sample. Run a TTLC & TCLP for lead. If TTLC results are <50 mg/kg, stop. If TTLC is >50 mg/kg but <1,000 mg/kg proceed with STLC. If TTLC is >1,000 mg/kg, stop.

SAMPLED BY: (PRINT) <u>Zindar Brunelle</u>	DATE: <u>4/30/19</u>	RECEIVED BY: (PRINT) <u>Pisumik Jon</u>	DATE: <u>5/7/19</u>
(SIGN) <i>Zindar Brunelle</i>	TIME: <u>NA</u>	(SIGN)	TIME: <u>010-15</u>
RELINQUISHED BY: (PRINT) <u>Zindar Brunelle</u>	DATE: <u>5/6/19</u>	RECEIVED BY: (PRINT)	DATE:
(SIGN) <i>Zindar Brunelle</i>	TIME: <u>NA</u>	(SIGN)	TIME:
RELINQUISHED BY: (PRINT)	DATE:	RECEIVED FOR LABORATORY BY:	DATE:
(SIGN)	TIME:	(SIGN)	TIME:

XRF Paint Analyzer Data Sheet
Garberville Library (#'s 1-33)
715 Cedar St., Garberville, CA
and
Garberville District Supervisor's Office (#'s 34-69)
709/713 Cedar St., Garberville, 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	0.9	mg/cm2		0.2 Negative	1	5	4/29/2019	16:10:05	zburnelle	Action Level	Lead Paint
2	0.9	mg/cm2		0.2 Negative	1	5	4/29/2019	16:10:42	zburnelle	Action Level	Lead Paint
3	0.9	mg/cm2		0.2 Negative	1	5	4/29/2019	16:11:19	zburnelle	Action Level	Lead Paint
4	0	mg/cm2		0.3 Negative	1	2	4/29/2019	16:16:05	zburnelle	Action Level	Lead Paint
5	0.1	mg/cm2		0.3 Negative	1	2	4/29/2019	16:16:53	zburnelle	Action Level	Lead Paint
6	0.1	mg/cm2		0.3 Negative	1	2	4/29/2019	16:17:27	zburnelle	Action Level	Lead Paint
7	0	mg/cm2		0.3 Negative	1	2	4/29/2019	16:18:16	zburnelle	Action Level	Lead Paint
8	0.1	mg/cm2		0.3 Negative	1	2	4/29/2019	16:18:34	zburnelle	Action Level	Lead Paint
9	0	mg/cm2		0.3 Negative	1	2	4/29/2019	16:20:40	zburnelle	Action Level	Lead Paint
10	-0.1	mg/cm2		0.3 Negative	1	2	4/29/2019	16:21:02	zburnelle	Action Level	Lead Paint
11	0	mg/cm2		0.3 Negative	1	2	4/29/2019	16:22:28	zburnelle	Action Level	Lead Paint
12	-0.1	mg/cm2		0.3 Negative	1	2	4/29/2019	16:23:16	zburnelle	Action Level	Lead Paint
13	0.1	mg/cm2		0.3 Negative	1	2	4/29/2019	16:23:35	zburnelle	Action Level	Lead Paint
14	0.8	mg/cm2		0.2 Negative	1	5	4/29/2019	16:26:11	zburnelle	Action Level	Lead Paint
15	0	mg/cm2		0.3 Negative	1	2	4/29/2019	16:27:56	zburnelle	Action Level	Lead Paint
16	-0.4	mg/cm2		0.3 Negative	1	2	4/29/2019	16:28:33	zburnelle	Action Level	Lead Paint
17	-0.4	mg/cm2		0.3 Negative	1	2	4/29/2019	16:29:16	zburnelle	Action Level	Lead Paint
18	-0.3	mg/cm2		0.3 Negative	1	2	4/29/2019	16:29:51	zburnelle	Action Level	Lead Paint
19	-0.2	mg/cm2		0.3 Negative	1	2	4/29/2019	16:30:10	zburnelle	Action Level	Lead Paint
20	-0.1	mg/cm2		0.3 Negative	1	2	4/29/2019	16:36:00	zburnelle	Action Level	Lead Paint
21	-0.2	mg/cm2		0.3 Negative	1	2	4/29/2019	16:36:44	zburnelle	Action Level	Lead Paint
22	-0.2	mg/cm2		0.3 Negative	1	2	4/29/2019	16:39:07	zburnelle	Action Level	Lead Paint
23	-0.3	mg/cm2		0.3 Negative	1	2	4/29/2019	16:40:12	zburnelle	Action Level	Lead Paint

XRF Paint Analyzer Data Sheet

Garberville Library (#'s 1-33)

715 Cedar St., Garberville, CA

and

Garberville District Supervisor's Office (#'s 34-69)

709/713 Cedar St., Garberville, CA

24	-0.3 mg/cm2	0.3 Negative	1	2	4/29/2019	16:40:55	zburnelle	Action Level	Lead Paint
25	-0.1 mg/cm2	0.3 Negative	1	2	4/29/2019	16:42:08	zburnelle	Action Level	Lead Paint
26	-0.1 mg/cm2	0.3 Negative	1	2	4/29/2019	16:42:41	zburnelle	Action Level	Lead Paint
27	0.2 mg/cm2	0.3 Negative	1	2	4/29/2019	16:43:08	zburnelle	Action Level	Lead Paint
28	0.1 mg/cm2	0.3 Negative	1	2	4/29/2019	16:43:57	zburnelle	Action Level	Lead Paint
29	0.2 mg/cm2	0.3 Negative	1	2	4/29/2019	16:45:26	zburnelle	Action Level	Lead Paint
30	-0.1 mg/cm2	0.3 Negative	1	2	4/29/2019	16:48:57	zburnelle	Action Level	Lead Paint
31	0.8 mg/cm2	0.2 Negative	1	5	4/29/2019	17:01:09	zburnelle	Action Level	Lead Paint
32	0.9 mg/cm2	0.2 Negative	1	5	4/29/2019	17:01:45	zburnelle	Action Level	Lead Paint
33	0.7 mg/cm2	0.2 Negative	1	5	4/29/2019	17:02:25	zburnelle	Action Level	Lead Paint
34	0.9 mg/cm2	0.2 Negative	1	5	4/30/2019	19:03:00	zburnelle	Action Level	Lead Paint
35	0.9 mg/cm2	0.2 Negative	1	5	4/30/2019	19:03:45	zburnelle	Action Level	Lead Paint
36	0.9 mg/cm2	0.2 Negative	1	5	4/30/2019	19:04:22	zburnelle	Action Level	Lead Paint
37	0 mg/cm2	0.3 Negative	1	2	4/30/2019	19:06:39	zburnelle	Action Level	Lead Paint
38	0.1 mg/cm2	0.3 Negative	1	2	4/30/2019	19:07:41	zburnelle	Action Level	Lead Paint
39	-0.1 mg/cm2	0.3 Negative	1	2	4/30/2019	19:08:10	zburnelle	Action Level	Lead Paint
40	0.3 mg/cm2	0.3 Negative	1	2	4/30/2019	19:08:38	zburnelle	Action Level	Lead Paint
41	-0.2 mg/cm2	0.3 Negative	1	2	4/30/2019	19:09:30	zburnelle	Action Level	Lead Paint
42	-0.4 mg/cm2	0.3 Negative	1	2	4/30/2019	19:11:21	zburnelle	Action Level	Lead Paint
43	-0.1 mg/cm2	0.3 Negative	1	2	4/30/2019	19:12:32	zburnelle	Action Level	Lead Paint
44	1.8 mg/cm2	0.3 Positive	1	2	4/30/2019	19:13:15	zburnelle	Action Level	Lead Paint
45	0 mg/cm2	0.3 Negative	1	2	4/30/2019	19:14:25	zburnelle	Action Level	Lead Paint
46	0 mg/cm2	0.3 Negative	1	2	4/30/2019	19:15:29	zburnelle	Action Level	Lead Paint
47	0.3 mg/cm2	0.3 Negative	1	2	4/30/2019	19:16:25	zburnelle	Action Level	Lead Paint
48	0 mg/cm2	0.3 Negative	1	2	4/30/2019	19:17:37	zburnelle	Action Level	Lead Paint
49	0.1 mg/cm2	0.3 Negative	1	2	4/30/2019	19:18:13	zburnelle	Action Level	Lead Paint
50	1.1 mg/cm2	0.2 Positive	1	5	4/30/2019	19:18:44	zburnelle	Action Level	Lead Paint
51	0.3 mg/cm2	0.3 Negative	1	2	4/30/2019	19:19:42	zburnelle	Action Level	Lead Paint
52	-0.2 mg/cm2	0.3 Negative	1	2	4/30/2019	19:20:26	zburnelle	Action Level	Lead Paint
53	3 mg/cm2	0.3 Positive	1	2	4/30/2019	19:29:55	zburnelle	Action Level	Lead Paint

XRF Paint Analyzer Data Sheet

Garberville Library (#'s 1-33)

715 Cedar St., Garberville, CA

and

Garberville District Supervisor's Office (#'s 34-69)

709/713 Cedar St., Garberville, CA

54	0 mg/cm2	0.3 Negative	1	2	4/30/2019	19:31:23	zburnelle	Action Level	Lead Paint
55	-0.2 mg/cm2	0.3 Negative	1	2	4/30/2019	19:31:47	zburnelle	Action Level	Lead Paint
56	-0.2 mg/cm2	0.3 Negative	1	2	4/30/2019	19:33:33	zburnelle	Action Level	Lead Paint
57	0.2 mg/cm2	0.3 Negative	1	2	4/30/2019	19:33:51	zburnelle	Action Level	Lead Paint
58	0.4 mg/cm2	0.3 Negative	1	2	4/30/2019	19:34:39	zburnelle	Action Level	Lead Paint
59	0.4 mg/cm2	0.3 Negative	1	2	4/30/2019	19:35:17	zburnelle	Action Level	Lead Paint
60	0.4 mg/cm2	0.3 Negative	1	2	4/30/2019	19:37:17	zburnelle	Action Level	Lead Paint
61	0.1 mg/cm2	0.3 Negative	1	2	4/30/2019	19:37:40	zburnelle	Action Level	Lead Paint
62	15.5 mg/cm2	0.3 Positive	1	2	4/30/2019	19:38:04	zburnelle	Action Level	Lead Paint
63	-0.2 mg/cm2	0.3 Negative	1	2	4/30/2019	19:38:53	zburnelle	Action Level	Lead Paint
64	-0.3 mg/cm2	0.3 Negative	1	2	4/30/2019	19:39:22	zburnelle	Action Level	Lead Paint
65	0 mg/cm2	0.3 Negative	1	2	4/30/2019	19:39:41	zburnelle	Action Level	Lead Paint
66	-0.1 mg/cm2	0.3 Negative	1	2	4/30/2019	19:40:07	zburnelle	Action Level	Lead Paint
67	1 mg/cm2	0.2 Positive	1	5	4/30/2019	19:42:16	zburnelle	Action Level	Lead Paint
68	1 mg/cm2	0.2 Positive	1	5	4/30/2019	19:42:52	zburnelle	Action Level	Lead Paint
69	0.9 mg/cm2	0.2 Negative	1	5	4/30/2019	19:43:28	zburnelle	Action Level	Lead Paint

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.

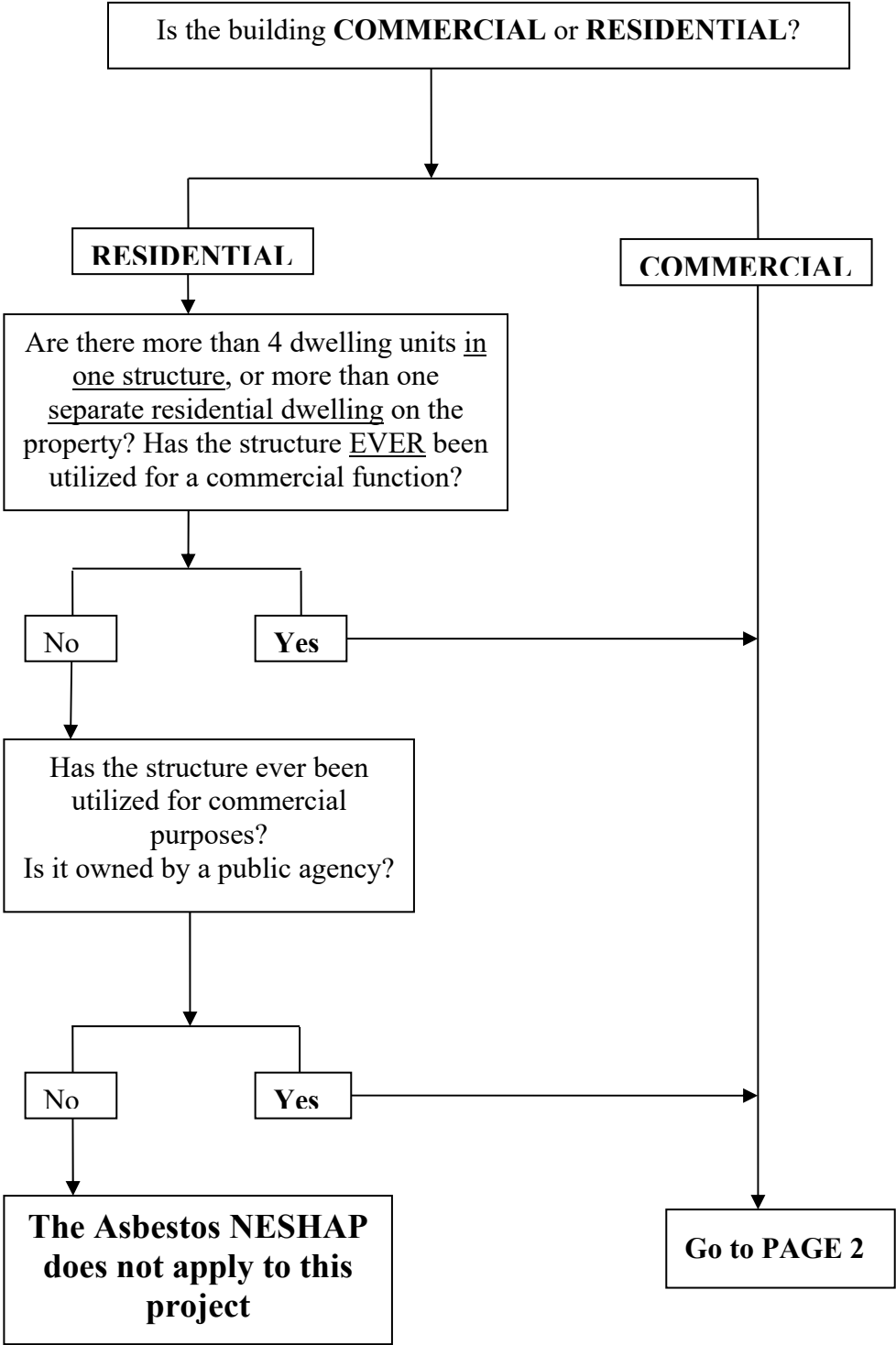
For a demolition - Upon completion of the asbestos survey, a demolition notification form must be submitted to the District at least 10 working days prior to the start date of the demolition. Notification of a demolition is required regardless of the amount of asbestos present. When asbestos-containing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

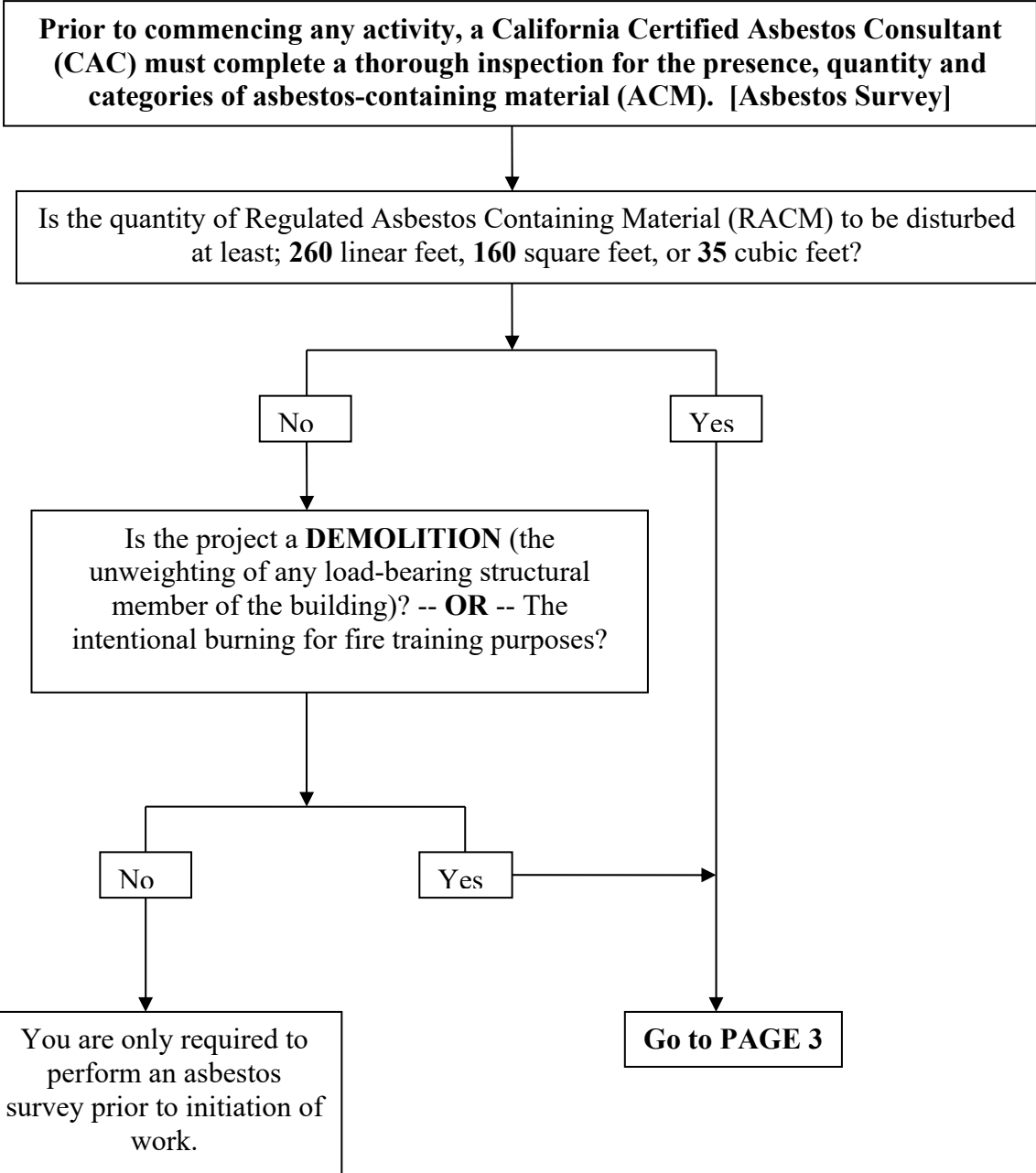
Other Training Requirements – *When removing or disturbing RACM, an AHERA-accredited Contractor/Supervisor must be present and all workers must be AHERA-accredited Workers (40 CFR 763, Subpart E, App. C). All training must be current.*

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

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

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

NORTH COAST UNIFIED AIR QUALITY MANAGEMENT DISTRICT

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

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

Operator Project #	Postmark	Date Received	Notification #	
I. TYPE OF NOTIFICATION Circle One: O = Original R = Revised C = Canceled				
II. FACILITY INFORMATION (<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:		
III. TYPE OF OPERATION Circle One: D = Demolition O = Ordered Demolition R = Renovation E = Emergency Renov.				
IV. IS ASBESTOS PRESENT Circle One: (Yes No)				
V. FACILITY DESCRIPTION (<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:		
VI. PROCEDURE USED TO DETECT THE PRESENCE OF ASBESTOS MATERIAL {An asbestos survey performed by a California "Certified Asbestos Consultant", is required to process this notification}				
C.A.C. Certification #		Certification Expiration Date:		
VII. APPROXIMATE AMOUNT OF ASBESTOS, INCLUDING: 1. Regulated ACM to be Removed 2. Category I ACM to be Removed 3. Category II ACM to be Removed				
	RACM To Be Removed	Nonfriable Asbestos Material To Be Removed		Indicate Unit of Measurement Below
		Category I	Category II	Units
Pipes				Ln Ft: Ln m:
Surface Area				Sq Ft: Sq m:
Vol. RACM Off Facility Component				Cu Ft: Cu m:
VIII. SCHEDULED DATES ASBESTOS REMOVAL (MM/DD/YY)		Start:	Complete	
IX. SCHEDULED DATES DEMO/RENOVATION (MM/DD/YY)		Start:	Complete	
X. DESCRIPTION OF PLANNED DEMOLITION OR RENOVATION WORK, AND METHOD(S) TO BE USED:				
District Use Only		Date Payment Received:	Payment Method:	Check Number:
				Amount:

NOTIFICATION OF DEMOLITION OR RENOVATION (continued)

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>):		
XII. WASTE TRANSPORTER #1		
Name:		
Address:		
City:	State:	Zip:
Contact Person:	Tel:	
WASTE TRANSPORTER #2		
Name:		
Address:		
City:	State:	Zip:
Contact Person:	Tel:	
XIII. WASTE DISPOSAL SITE		
Name:		Tel:
Address:		
City:	State:	Zip:
XIV. IF DEMOLITION ORDERED BY A GOVERNMENT AGENCY PLEASE IDENTIFY THE AGENCY BELOW (<i>attach copy of demolition order</i>):		
Name:		Title
Authority		
Date of Order (MM/DD/YY):	Date Ordered to Begin (mm/dd/yy):	
XV. FOR EMERGENCY RENOVATIONS		
Date and Hour of Emergency (mm/dd/yy):		
Description of the Sudden, Unexpected Event:		
Explanation of how the event caused unsafe conditions or would cause equipment damage or an unreasonable financial burden:		
XVI. DESCRIPTION OF PROCEDURES TO BE FOLLOWED IN THE EVENT THAT UNEXPECTED ASBESTOS IS FOUND, OR PREVIOUSLY NONFRIABLE ASBESTOS MATERIAL BECOMES FRIABLE:		
XVII. I CERTIFY THAT AN INDIVIDUAL TRAINED IN THE PROVISIONS OF THIS REGULATION (40 CFR PART 61, SUBPART M) WILL BE ON-SITE DURING ALL ASBESTOS ABATEMENT, AND EVIDENCE THAT THE REQUIRED CERTIFICATION ACCOMPLISHED BY THIS PERSON WILL BE AVAILABLE FOR INSPECTION BY REGULATING AUTHORITIES DURING NORMAL BUSINESS HOURS.		
_____		_____
(Print Name of Owner/Operator)		(Signature of Owner/Operator)
XVIII. I CERTIFY THAT THE ABOVE INFORMATION IS CORRECT.		
_____		_____
(Print Name of Owner/Operator)		(Signature of Owner/Operator)

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

- SINGLE DEMOLITION – **OR** – RENOVATION PROJECTS **2 X**
- ASBESTOS ABATEMENT accompanying a demolition (Regulation IV, Rule 401, §1.1.2) **4 X**

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

APPENDIX D
Consultant Certifications

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

Zindar Brunelle

Name



Certification No. **14-5295**

Expires on **10/15/20**

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:



Zindar Brunelle

CERTIFICATE TYPE:

Lead Inspector/Assessor
 Lead Supervisor

NUMBER:

LRC-0000482
 LRC-0000481

EXPIRATION DATE:

9/2/2020
 9/2/2020

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

Certificate of Training

This Certifies that

Zindar Brunelle

has successfully completed 4 hours training entitled

Asbestos Building Inspector Refresher

Toxic Substances Control Act, Title II (AHERA)

This is an annual certification. It must be renewed.

Environmental
 Safety
 Training
 Professionals Ltd.

3140 Gold Camp Drive #130
 Rancho Cordova, CA 95670
 Phone 916 638-5550
 Fax 916 638-5551
 Division Approval #CA-006-06

I.D. #: 7598
 Certification #: 25682
 Course Date: 03/07/19

By 
 Authorized Signature: Brandy Snider

Expiration Date: 03/07/20