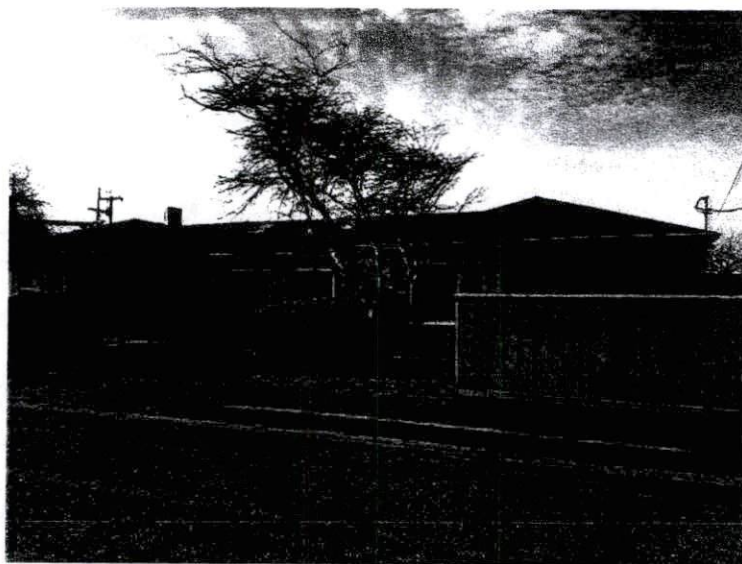


Attachment 2

Limited Asbestos And Paint Screening Survey

Brunelle & Clark Consulting, LLC

**LIMITED ASBESTOS AND PAINT
SCREENING SURVEY
2956 "D" STREET
EUREKA, CALIFORNIA**



January 24, 2018

Project # 1800302

Prepared for:
Humboldt County Public Works
Attn: Mr. Jake Johnson
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(707) 445-7652

Prepared by:
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Certified Asbestos Consultant, #14-5295
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January 24, 2018

**LIMITED ASBESTOS AND PAINT
SCREENING SURVEY
2956 "D" STREET
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**LIMITED ASBESTOS AND PAINT
SCREENING SURVEY
2956 "D" STREET
EUREKA, CALIFORNIA**

1.0 PURPOSE

On January 7, 2018, this firm conducted an asbestos screening survey of suspect building materials present at the above referenced address. Representative paint sampling for lead was also conducted. The asbestos and paint surveys were intended to provide a screening of the more common suspect materials for asbestos and lead content prior to a possible sale of the property and were not intended to be complete all-inclusive surveys. The asbestos survey was limited to drywall and flooring materials, attic insulation, exterior stucco, and a partial survey of the crawlspace. The scope of the asbestos survey was somewhat expanded beyond the initial scope to cover floorings materials damaged due a water leak event. This required all successive flooring layers throughout the structure be accessed and sampled. This asbestos survey did not cover roofing materials, concrete, windows, or other miscellaneous materials such as interior cabinetry/formica glues, and ducting. The scope of this limited asbestos survey is not adequate to fully cover renovation and/or demolition work however, the data from this survey can be used to augment further surveys as needed for those purposes. See Figures 1-3 (Appendix A).

This asbestos survey was conducted to identify asbestos containing materials (ACM) as requested by the client. This asbestos survey can provide compliance with the California Health & Safety Code and the Cal/OSHA regulations (8 CCR 1529) for worker protection to the extent that only specifically sampled building material are disturbed by any renovation activity. This report can be used to augment further asbestos surveys to provide compliance with the EPA National Emission Standards for Hazardous Air Pollutants (NESHAP) regulations concerning renovation 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 analyses was conducted using a portable X-ray fluorescence (XRF) paint analyzer.

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

2.0 EXECUTIVE SUMMARY

This is a single-story wood framed commercial structure sitting on a perimeter foundation. The interior walls and ceilings are finished with gypsum drywall, with texturing. Some floors are carpeted, and some floors are finished with various types of sheet floorings, often found in multiple successive layers. There are plaster firewalls in the attic space, and the exterior siding is

stucco. This survey was limited to drywall materials, flooring materials, exterior stucco siding and attic insulation. Partial observations in the crawlspace revealed the presence of some transite (asbestos-concrete) piping, as noted in this report (see Figure 3, Appendix A).

Asbestos Survey

During this survey, a total of forty-seven (47) bulk samples were collected from suspect materials. All sample locations are indicated on attached Figure 1, Appendix A. The materials sampled for asbestos analyses are summarized below:

- 7 Gypsum board/joint compound
- 5 Texture, knockdown
- 3 Plaster, single coat
- 1 Gypsum button-board
- 2 Attic insulation, blown-in, white
- 18 Sheet floorings/with glues where present (multiple types)
- 2 Tar paper, flooring
- 1 Floor leveling compound
- 4 Exterior stucco, white top coat & gray rough coat
- 3 Exterior stucco, tan top coat & gray rough coat
- 1 Exterior stucco top coat, white

Total = 47 samples

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). The sample Chain of Custody and Laboratory Report is contained in Appendix B. All the Asbestos analytic data are summarized in Table 2, Appendix B.

The following definitions are referred to in this report. See Section 5.0 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.

Four surveyed materials were found to be ACM. Three of these ACM are further categorized as RACM. The ACM and the RACM are summarized separately below:

ACM

- Transite (asbestos-concrete) piping (6" diameter) was noted in the crawlspace, beneath Room 4 and Restroom 2. This is "presumed" to be asbestos containing without sampling. The pipe section was estimated to be about 25 feet in length. A complete inspection of the crawlspace was not part of the project scope and additional transite and/or other asbestos containing materials beyond what is noted here may be present in the crawlspace or elsewhere.

The three ACM sheet floorings found during the survey all have a "friable" papery backing layer that contains asbestos. Therefore, all three are further categorized as regulated ACM (RACM), as summarized below.

RACM

- Sheet flooring, brown octagon pattern, in North Hall Closet, much being remnant scraps of papery backing adhered to the plywood underlayment, which must also be abated.
- Sheet flooring, described as "brown octagon" in the field sample and as "orange-tan" in the laboratory report. Found in the Kitchen, as the 3rd layer down, below a 2nd layer of wood underlayment.
- Sheet flooring, tan & brown, in Room 8, 2nd layer down, beneath particle board underlayment.

The ACM/RACM found at this site are listed in Table 1 below, including locations, asbestos content, the agency categorizations, abatement requirements, and waste categorizations. The locations of the ACM are listed in Table 1 and shown on Figure 3, Appendix A.

Paint Sampling/Analysis

In order to characterize the lead content in paint coatings at this site, screening of representative paint coatings was conducted using a portable XRF (X-ray fluorescence) paint analyzer. The paint at twenty-five locations was analyzed with the XRF. Sample locations are shown on Figure 2, Appendix A. The XRF test results are summarized in Table 3 (Appendix B). The sampling and analytic methods and the results are further explained in Section 4.0.

As determined by the site XRF analyses, of the twenty-five samples, one was found to be "Lead Based Paint" (LBP), five tested as "Lead Containing Surface Coatings" (LCSC), and nineteen were found to be negative (NEG) for detectable lead.

The disturbance of any LBP and/or LCSC by Cal/OSHA defined "trigger tasks" 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/LCSC paint including, but not limited to, manual demolition, scraping, sanding, cutting, sawing, and torch cutting. The compliance measures are summarized further in Section 4.0.

**TABLE 1
ASBESTOS IDENTIFICATIONS & CLASSIFICATIONS**

Partial Survey (Screening), 2956 "D" Street, Eureka, CA

MATERIAL	LOCATION	QUANTITY	ASBESTOS CONTENT & TYPE	OSHA CLASSIFICATION	NESHAP CATEGORY	WASTE DISPOSAL CLASSIFICATION
Sheet flooring, brown octagon pattern & remnant backing and contaminated wood underlayment	North hall closet, on plywood underlayment	Approx. 6 SF	15% CH	ACM, Class II abatement required where disturbed	Friable, RACM	"Friable" asbestos waste
Sheet flooring, described as "brown octagon" or "orange tan" and any contaminated wood underlayment	Kitchen, 3 rd layer down, under 2 nd layer of wood underlayment	Approx. 175 SF	10% CH	ACM, Class II abatement required where disturbed	Friable, RACM	"Friable" asbestos waste
Sheet flooring, tan & brown, and any contaminated wood underlayment	Room 8, 2 nd layer down, under particle board underlayment	Approx. 190 SF	10% CH	ACM, Class II abatement required where disturbed	Friable, RACM	"Friable" asbestos waste
Transite pipe, gray	Crawlspace, beneath Room 4 & RR2 (Note: potential for more transite pipe in other areas of the crawlspace)	6" diam., approx. 25' in length	PACM	ACM, Class II abatement required where disturbed	Category II Non-Friable. Not RACM*	Non-friable asbestos waste

SF = Square Feet LF = Lineal Feet

CH = Chrysotile asbestos

ACM = Asbestos Containing Materials, containing >1% asbestos

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

3.0 CONCLUSIONS & RECOMMENDATIONS FOR ASBESTOS

EPA NESHAP

Due to use for “institutional” housing (a “public” site), this building is 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 *regulated asbestos containing materials* (RACM), as defined under NESHAP, prior to any renovation and/or demolition work at “subject” sites. **Any renovation activities will require supplemental sampling of materials not included in this “screening” survey, in order to satisfy the EPA NESHAP requirement.**

For any renovation/demolition project, if the amount of RACM to be abated exceeds the threshold quantity (160 square feet, 260 linear feet & 35 cubic feet) that requires filing a NESHAP Notification for the *abatement* of RACM. A “NESHAP Notification for Abatement” must 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 a \$262.00 filing fee. The assistance of the asbestos abatement contractor will typically be needed to file the Notification for RACM abatement. Contact the NCUAQMD (443-3093) if any questions arise.

For any renovation project, if the proposed renovations will disturb any “load bearing” members, the work is considered “demolition” work. A NESHAP Notification is always required prior to “demolition” work. If the work does involve demolition of any “load bearing member,” a NESHAP Notification for *demolition* must also be filed with the NCUAQMD at least ten working days prior to any activity that will disturb any “load bearing” members. The NESHAP notification for “abatement” and “demolition” can be filed using the same form however, an additional \$262.00 filing fee is required. Contact the NCUAQMD (443-3093) if any questions arise.

This office cannot make determinations concerning the possible “load bearing” members; that determination should be made by the project architect or other project contractors. Contact the NCUAQMD (443-3093) if any questions arise.

Cal/OSHA

All employees are covered by OSHA regulations. The disturbance of any materials containing asbestos is subject to Cal/OSHA worker (employee) protection regulations for asbestos related work (8 CCR 1529). The Cal/OSHA regulations require that “any activities disturbing” materials containing “any amount of asbestos” must be done by properly trained and certified asbestos abatement contractors & workers, using proper abatement methods. It is therefore necessary to abate asbestos containing materials from buildings prior to the disturbance of such materials by renovation or demolition activities.

Project ACM

The regulatory requirements for the ACM and RACM identified during this “screening” survey are discussed below. Note: this is a screening, and other unidentified asbestos materials may be present in the building.

ACM Transite Pipe: Asbestos concrete (Transite) drain pipe was identified in the crawl space. Any abatement or disturbance of transite materials must be done by a licensed asbestos abatement contractor using Class II methods if done “intact,” with disposal as “non-friable” asbestos.

ACM Sheet Flooring (RACM): Three types of sheet flooring identified in this report contain asbestos. In sheet flooring, the asbestos is present in the papery backing layer. The papery backing layer is considered “friable,” and the sheet flooring is therefore categorized as RACM under NESHAP regulations. Where required, the ACM sheet flooring must be abated by a licensed asbestos abatement contractor using Class II asbestos abatement methods at a minimum. *It is recommended herein to augment the standard Class II abatement with negative air containment of the abatement area.* The abated ACM sheet flooring must be disposed of as “friable” asbestos waste. This will require the use of a licensed “hazardous” waste hauler. In addition, a temporary hazardous waste generator number from the EPA will need to be obtained for the site. An abatement contractor will typically handle these issues.

Note: the remnant RACM sheet flooring in the North Hall Closet is damaged and exposed. This sheet flooring section should be abated as soon as possible, including the contaminated underlayment, and properly disposed. This location is very small in area (approximately 6 square feet).

The RACM sheet flooring in the two other locations are both buried beneath subsequent flooring layers. Unless/until these two other locations need to be disturbed for renovation, demolition, or repair, those RACM sheet floorings may remain in place. There is no requirement to abate either until needed to avoid any disturbance.

If just the 6 SF of exposed RACM sheet flooring in the North Hall Closet is to be abated, then a NESHAP Notification for RACM abatement is not required since the amount is under the threshold quantity that requires Notification. Refer to Table 1 for the RACM quantities in all three locations.

If all the RACM sheet flooring identified in in this report is to be abated, the abatement of RACM will exceed the threshold of 160 SF (square feet), and a NESHAP Notification will be required. An asbestos abatement contractor typically files the Notification for RACM abatement.

4.0 PAINT SAMPLING/LEAD ANALYSIS

Initial 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 paint coatings at twenty-five locations, as shown on Figure 2, Appendix A.

The XRF readings were collected from thirteen interior components and twelve exterior components, as summarized below.

Interior Components: (13)

- Window sill (1)
- Window jamb (1)
- Window trim (1)
- Door (2)
- Door jamb (1)
- Door trim (1)
- Wall (3)
- Wainscot (3)

Exterior Components: (12)

- Stucco siding (7)
- Window sill (2)
- Window jamb (1)
- Window trim (1)
- Door (1)

XRF results of ≥ 1.0 mg/cm² are defined as “Lead Based Paint” (LBP). XRF results of ≥ 0.1 mg/cm² & < 1.0 mg/cm² are considered “Lead Containing Surface Coating” (LCSC). XRF results of < 0.1 mg/cm² are considered negative for detectable lead.

By XRF analyses, one sample was LBP, five were LCSC, and nineteen were “negative” for lead. See Table 3, Appendix B for the XRF results.

As determined by this “screening,” some paint coatings on this site are “Lead Based Paint” (LBP), some are “Lead Containing Surface Coatings” (LCSC), and some are considered negative for detectable lead.

Cal/OSHA Compliance Measures for Trigger Tasks on LCSC and/or LBP

The disturbance of any LBP and/or LCSC by Cal/OSHA defined “trigger tasks” 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/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 containing materials 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.

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).

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.

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.

If lead abatement is conducted during this project, Title 17 requirements for lead abatement must be followed. Title 17 abatement requirements include, but are not limited to: a certified lead supervisor and certified lead workers, using work practices defined by the HUD Guidelines, use of containment, an abatement plan prepared by a properly certified individual, notification to the CDPH using the CDPH Form 8551, and posting of the CDPH Form 8551. See 17 CCR 36100 for all Title 17 abatement requirements, and the "Guidelines for the Evaluation and Control of

Lead-Based Paint Hazards in Housing,” U.S. Department of Housing and Urban Development, June 1995 for incorporated HUD work practice requirements.

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 “level” of waste, which can range between unrestricted “general construction debris” and highly restrictive Resource Conservation and Recovery Act (RCRA) federal “hazardous” waste.

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 included in the waste stream testing for lead. Recycling facilities must be notified when recycle components have lead containing surface coatings.

5.0 SUMMARY OF ASBESTOS REGULATIONS

There are numerous regulations concerning asbestos and several either require or imply that an asbestos inspection must be performed prior to work that will *disturb* asbestos. Some of the most common regulations are listed below, followed by more detailed explanations. The intent of the following information is to advise you of some of the regulations that may affect you, but is not intended to be an all-encompassing discussion of asbestos regulations.

- The EPA National Emissions Standard For Hazardous Air Pollutants (NESHAP) regulation (40 CFR, Part 61, Subpart M) requires an asbestos survey prior to demolition and/or renovation activities on subject properties. NESHAP protects air quality.
- The OSHA Asbestos Standard (Title 8 CCR 1529) for the construction Industry is designed to protect any employees (workers) from adverse exposure to asbestos in any workplace, and in particular, regulates the asbestos abatement industry.
- The Asbestos Hazard Emergency Response Act (AHERA) 40 CFR Part 763, Subpart E, regulates asbestos in schools including, but not limited to; inspections, response actions, clearances, training, and certifications.
- The California Asbestos Notification Act (California Health and Safety Code, Section 25915 et. seq.) and Proposition 65 (Right to Know laws).
- The California Labor Code 6501.9 which indicates the building owner must determine if asbestos is present at a worksite prior to contracted work.

The EPA NESHAP and the OSHA (Cal/OSHA) regulations are two of the most pertinent sets of asbestos regulations.

NESHAP: The Environmental Protection Agency (EPA) promulgated the NESHAP regulations specifically for the protection of air quality arising from the possible disturbance of asbestos by renovation and demolition activities. NESHAP regulations are enforced either by local air quality agencies or by the regional EPA office. For the Counties of Humboldt, Del Norte, and Trinity, the enforcing agency is the *North Coast Unified Air Quality Management District (NCUAQMD)* located in Eureka, California.

Under NESHAP, the EPA regulates certain types of ACM. Generally, all friable* types of asbestos are considered to be “Regulated Asbestos Containing Materials” (RACM). Materials that contain 1% or less asbestos are not considered friable and are not regulated under the NESHAP. If non-friable ACM becomes friable, or will be made friable during disturbance or removal, the previously unregulated ACM becomes “RACM.” Thus, the manner by which ACM are abated can affect the NESHAP categorization and regulation.

For sites subject to NESHAP regulations a “Notification” must be filed with the NCUAQMD (EPA) at least 10 working days prior to any *renovation* work where RACM is to be removed at or above EPA defined threshold quantities (160 SF, 260 LF, or 35 CF). Demolition of public and commercial buildings always requires the 10-day NESHAP Notification. Furthermore, under NESHAP, renovation work that involves the removal of any “load bearing” member is deemed to be “*demolition*” work. Notification for *abatement* of RACM or *demolition* must include an asbestos survey report which identifies all RACM, as well as a required filing fee, currently \$256. If a demolition project will include abatement of RACM, two separate (or combined) notifications along with separate filing fees for both abatement and demolition are required.

Cal/OSHA: OSHA has federal asbestos regulations however; in California they are superseded by Cal/OSHA asbestos regulations. The OSHA regulations are designed to protect workers from asbestos exposure, and are applicable to the disturbance of any ACCM and/or ACM. Cal/OSHA does not require abatement of asbestos, but *regulates the methods of abatement* (or disturbance) of asbestos, requiring that employed workers be properly trained, equipped, and protected by special control measures during asbestos disturbance. Contractors conducting abatement work must be properly trained and licensed for asbestos abatement. Worker protection measures are not only required for disturbing ACM (>1% asbestos content), but for any amount of asbestos content at or above 0.1% up to 1.0% (ACCM). Thus, some materials containing 1% or less of asbestos may not be regulated ACM (RACM) under NESHAP, *but will still require compliance with OSHA regulations for the protection of workers disturbing any materials containing 0.1% asbestos or greater.*

All employees are covered by OSHA regulations. The disturbance of ACM or ACCM is subject to Cal/OSHA worker (employee) 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 abate ACM and ACCM from buildings prior to the disturbance of such materials by demolition and/or renovation work.

A Report of Use form must be filed with CAL/OSHA when a carcinogen is disturbed during renovation or demolition.

Building owners also have responsibilities to provide a safe work environment and must notify employees and contractors working inside a building known to contain asbestos.

The California Business and Professions Code, Section 7058.5 et. al. seq. requires asbestos abatement contractors to be certified with the Contractor State Licensing Board (in addition to being registered annually with CAL/OSHA). They must be certified if, at one job site, at one time, they ever engage in asbestos-related work involving 100 square feet or more of asbestos containing construction materials (ACCM, >0.1% asbestos). There are exceptions to this certification process for roofing and flooring materials. Work practices for asbestos removal are regulated by Cal/OSHA. In addition, when a carcinogen (asbestos) is to be disturbed, a Report of Use form must be filed with Cal/OSHA by the abatement contractor.

The Asbestos Notification Act applies to building owners, professional property managers of and tenants in non-residential buildings built before 1979 who know of ACCM in their buildings. They must provide a specific written notification to employees and contractors in the building. Results of inspections, sampling, etc. must be shared, warning signs posted, and various other actions taken. This notification must be done each year. In addition, a supplemental notification must be done within 90 days of a change in the material or the receipt of additional sampling results. A copy of this notice must be given to every co-owner or tenant. Tenants who receive this notice are required to notify their employees.

Under Section 25359.7 of the Health and Safety Code, owners of real estate property who know of or have reasonable cause to believe that ACM is present must disclose that prior to sale.

The Safe Drinking Water and Toxic Enforcement Act of 1986 (Proposition 65), regulates chemicals in California that cause cancer or reproductive toxicity. The list of chemicals involved is published in Division 2 of Title 22, beginning with Section 12000.

In addition to the above-mentioned regulations, the following regulations will most likely apply:

- ✓ Section 25914.1-3 Health and Safety Code
- ✓ Section 25359.7 Health and Safety Code
- ✓ Section 19827.5 Health and Safety Code
- ✓ 29 CFR 1910.1001
- ✓ 29 CFR 1926.1101
- ✓ 40 CFR Part 61, Subpart M (NESHAP)
- ✓ 40 CFR Part 763, Subpart E (AHERA)
- ✓ 8 CCR Article 4, 1529
- ✓ 8 CCR Article 110, 5208
- ✓ Labor Code Section 9000 et. seq.
- ✓ Labor Code section 6501.9
- ✓ 8 CCR Article 2.5, Section 341.6 et. seq.
- ✓ 8 CCR Article 2.5, Section 341.9

6.0 ASBESTOS SURVEY METHODOLOGY

Representative suspect asbestos-containing materials were bulk sampled in general accordance with sampling guidelines established by the Environmental Protection Agency and 29 CFR 1926.1101. The following summarizes the sampling procedures utilized.

- ❖ The general location of each sample was marked on a corresponding sketch.
- ❖ These materials were then categorized into homogeneous materials. A homogeneous material is defined as being uniform in texture, color, and date of application.
- ❖ A sampling scheme was developed based upon the location and quantity of the various homogeneous materials. Sample numbers were recorded on data sheets and each sample was categorized as a miscellaneous material (MM), surfacing material (SM), or thermal system insulation (TSI).
- ❖ Bulk samples were collected by a State of California, Division of Occupational Health & Safety certified Asbestos Building Inspector.
- ❖ Appropriate sampling tools and leak tight sample containers were used. Bulk sampling tools were decontaminated to prevent the spread of secondary contamination to subsequent bulk samples.
- ❖ Each bulk sample was individually numbered and recorded on a Bulk Sample Log and sent to a laboratory for analysis by Polarized Light Microscopy (PLM) following 40 CFR 763 procedures and/or other analysis if needed. The laboratory used for asbestos analyses is NVLAP and CA ELAP accredited.

7.0 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.

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.

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.

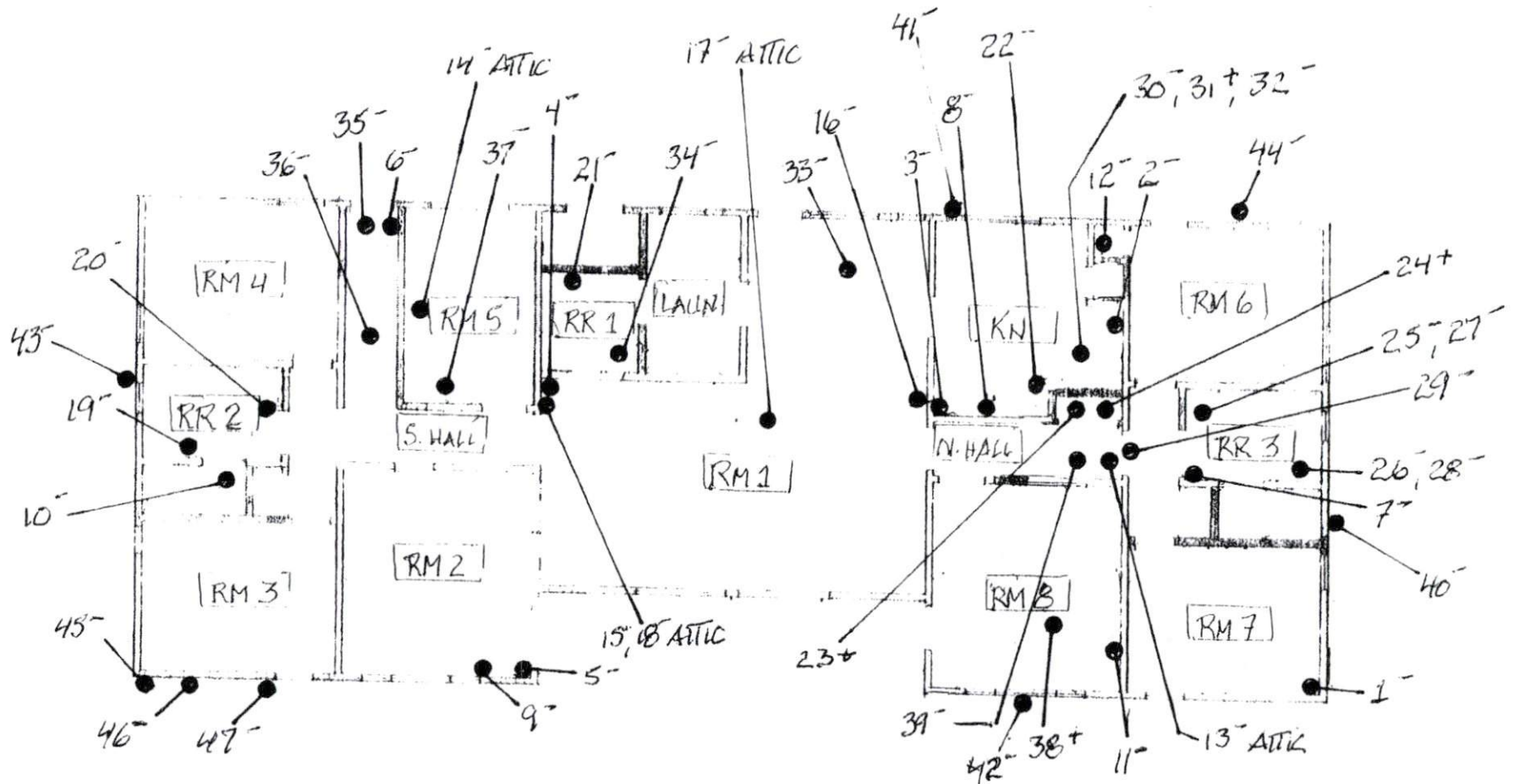
8.0 DISCLAIMER

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



LEGEND

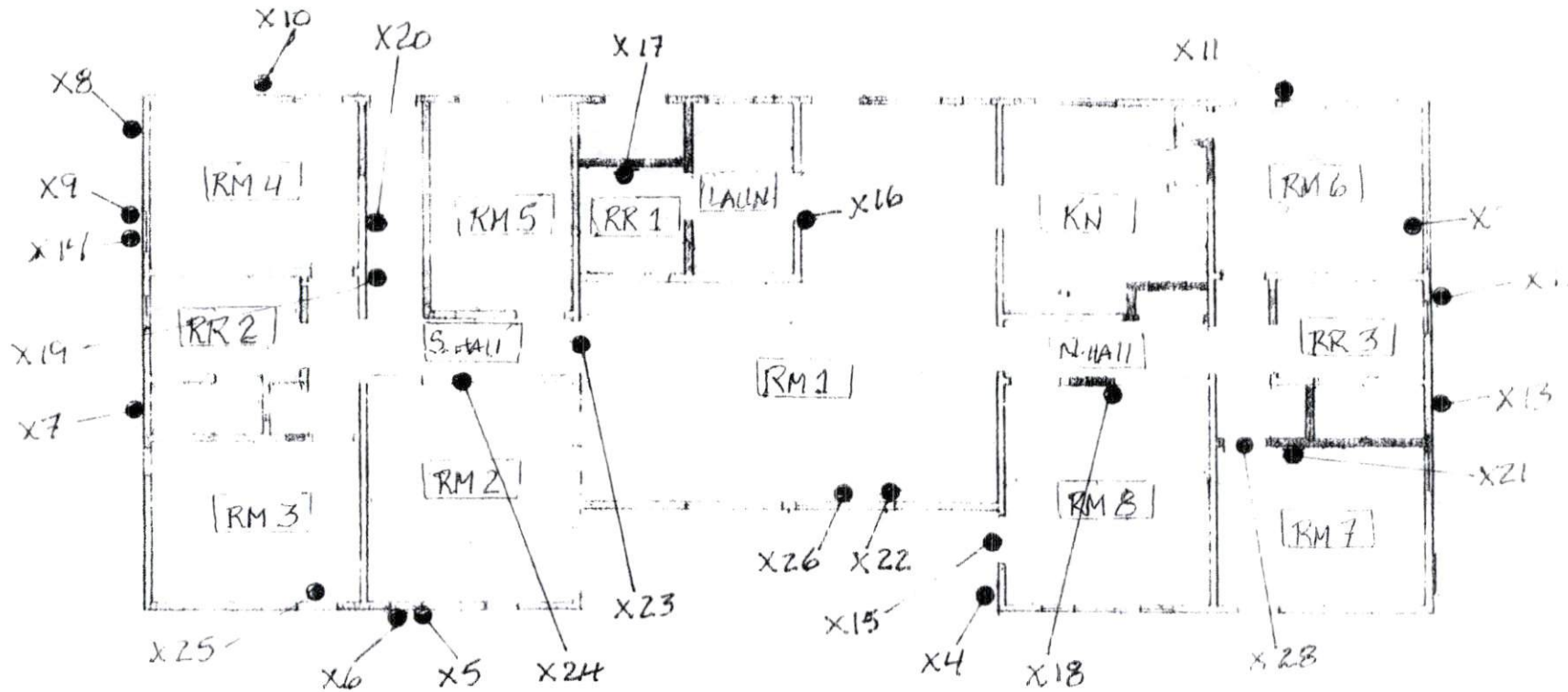
- — # Asbestos Sample Locations
(Prefixed 2956-#, with + or - designation)
(+) is positive for Asbestos. (-) is negative

ASBESTOS SAMPLE LOCATIONS

LIMITED SCREENING SURVEY
2956 "D" STREET
EUREKA, CA

FIG. 1

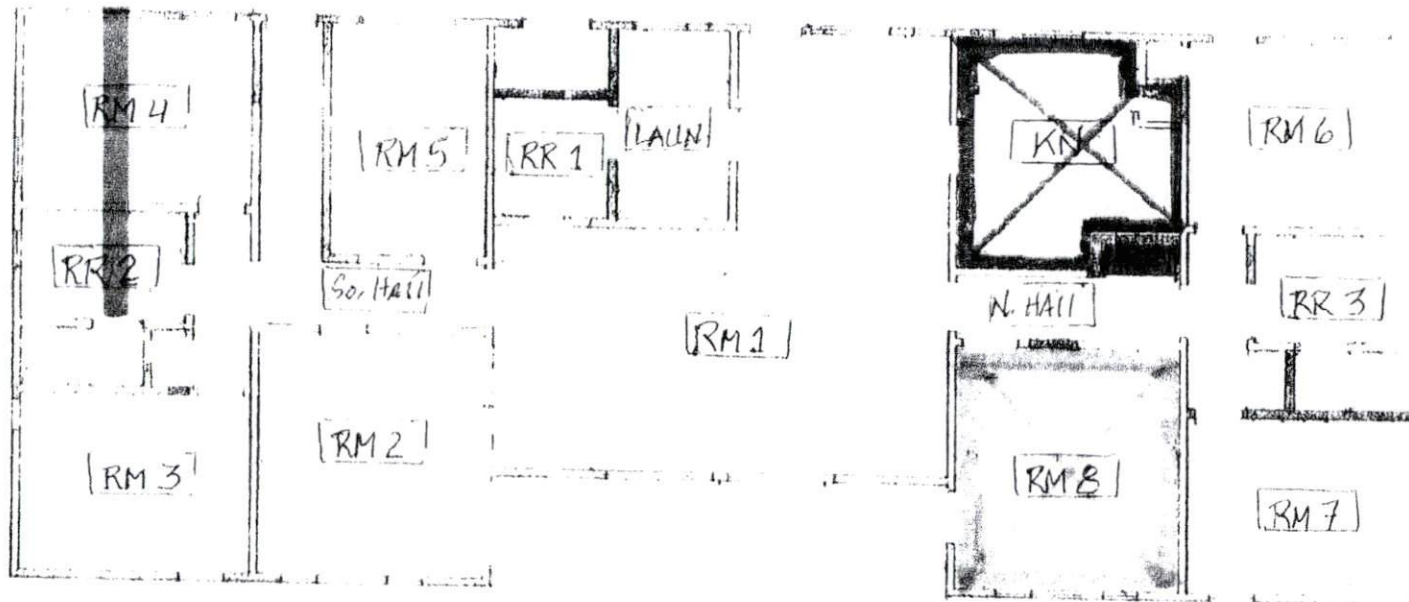
1800302 1/24/18



LEGEND

●—X# XRF Sample Locations

XRF PAINT SAMPLE LOCATIONS
LIMITED PAINT SCREENING SURVEY
2956 "D" STREET
EUREKA, CA



LEGEND

- ACM sheet flooring, brown octagon pattern, in north hall closet, mostly as remnant papery backing adhered to wood underlayment.
- ACM sheet flooring, described as "brown octagon" in field sample and as "orange-tan" by lab, in kitchen. 3rd layer down, under 2nd layer of wood underlayment.
- ACM sheet flooring, tan & brown, in Room 8, 2nd layer down, under particle board underlayment.
- Transite pipe in crawlspace, 6" dia., 25' length approximated.

ASBESTOS LOCATIONS

LIMITED SCREENING SURVEY
2956 "D" STREET
EUREKA, CA

FIG. 3

APPENDIX B
Tables & Laboratory Reports

TABLE 2
SUMMARY OF ANALYTIC DATA
2956 "D" Street, Eureka, CA

BOLD TYPE used to highlight asbestos. Note: Some samples had multiple layers, as analyzed

Sample Number	Sample Description (each layer)	Location	Asbestos % and Type	Friable vs. Non-Friable	Comments
2956-1	Joint Compound	Room 7, wall	None Detected	Non-Friable	
2 nd layergypsum Board	"'"	None Detected	Non-Friable	
2956-2	Joint Compound	Kitchen, wall	None Detected	Non-Friable	
2 nd layergypsum Board	"'"	None Detected	Non-Friable	
2956-3	Joint Compound	Kitchen, wall	None Detected	Non-Friable	
2 nd layergypsum Board	"'"	None Detected	Non-Friable	
2956-4	Joint Compound	Room 1, wall	None Detected	Non-Friable	
2 nd layergypsum Board	"'"	None Detected	Non-Friable	
2956-5	Joint Compound	Room 2, wall	None Detected	Non-Friable	
2 nd layergypsum Board	"'"	None Detected	Non-Friable	
2956-6	Joint Compound	South hall, ceiling	None Detected	Non-Friable	
2 nd layergypsum Board	"'"	None Detected	Non-Friable	
2956-7	Joint Compound	Restroom 3, wall	None Detected	Non-Friable	
2 nd layergypsum Board	"'"	None Detected	Non-Friable	
2956-8	Texture, knockdown	Kitchen, wall	None Detected	Non-Friable	
2956-9	Texture, knockdown	Room 2, wall	None Detected	Non-Friable	
2956-10	Texture, knockdown	Restroom 2, ceiling	None Detected	Non-Friable	
2956-11	Texture, knockdown	Room 8, wall	None Detected	Non-Friable	
2956-12	Texture, knockdown	Room 6, wall	None Detected	Non-Friable	
2956-13	Insulation, blown-in, white	Attic	None Detected	Friable	
2956-14	Insulation, blown-in, white	Attic	None Detected	Friable	
2956-15	Plaster, single coat, white	Attic, firewall	None Detected	Non-Friable	
2956-16	Plaster, single coat, white	Attic, firewall	None Detected	Non-Friable	
2956-17	Plaster, single coat, white	Attic, firewall	None Detected	Non-Friable	
2956-18	Button board, gypsum	Attic, firewall	None Detected	Non-Friable	

TABLE 2
SUMMARY OF ANALYTIC DATA
2956 "D" Street, Eureka, CA

BOLD TYPE used to highlight asbestos. Note: Some samples had multiple layers, as analyzed

Sample Number	Sample Description (each layer)	Location	Asbestos % and Type	Friable vs. Non-Friable	Comments
2956-19	Sheet flooring, gray mosaic, (type 1)	Restroom 2, floor	None Detected	Friable	
2 nd layerglue, off-white	""	None Detected	Friable	
2956-20	Sheet flooring, gray mosaic, (type 1)	Restroom 2, floor	None Detected	Friable	
2956-21	Sheet flooring, gray mosaic, (type 2)	Restroom 1, floor	None Detected	Friable	
2 nd layerglue, yellow	""	None Detected	Friable	
2956-22	Sheet flooring, gray mosaic, (type 2)	Kitchen, floor	None Detected	Friable	
2956-23	Sheet flooring, brown octagon	North hall closet, floor, on plywood underlayment	15% CH	Friable	
2956-24	Sheet flooring, brown octagon	North hall closet, floor, on plywood underlayment	PACM (15% CH)	Friable	NA/PS
2956-25	Sheet flooring, gray	Restroom 3, floor, top layer	None Detected	Friable	
2 nd layerglue, cream color	""	None Detected	Friable	
2956-26	Sheet flooring, gray	Restroom 3, floor, top layer	None Detected	Friable	
2 nd layerglue, yellow/tan	""	None Detected	Friable	
2956-27	Sheet flooring, gray mosaic, (type 3)	Restroom 3, floor, bottom layer	None Detected	Friable	
2 nd layerglue, beige/yellow	""	None Detected	Friable	

**TABLE 2
SUMMARY OF ANALYTIC DATA**

2956 "D" Street, Eureka, CA

BOLD TYPE used to highlight asbestos. Note: Some samples had multiple layers, as analyzed

Sample Number	Sample Description (each layer)	Location	Asbestos % and Type	Friable vs. Non-Friable	Comments
2956-28	Sheet flooring, gray mosaic, (type 3)	Restroom 3, floor, bottom layer	None Detected	Friable	
2 nd layerglue, yellow	""	None Detected	Friable	
2956-29	Floor leveling, gray	Restroom 3, floor, threshold	None Detected	Non-Friable	
2 nd layerglue, yellow	""	None Detected	Non-Friable	
2956-30	Sheet flooring, cream	Kitchen floor, 2 nd layer down, under particle board	None Detected	Friable	
2 nd layerglue, orange/beige	""	None Detected	Friable	
2956-31	Sheet flooring, brown octagon	Kitchen floor, 3rd layer down, under 2nd layer of wood underlayment	10% CH	Friable	
2956-32	Tarpaper, brown	Kitchen floor, lowest layer, on subfloor	None Detected	Friable	
2956-33	Sheet flooring, cream	Restroom 1, floor, 2 nd layer down, under particle board	None Detected	Friable	
2956-34	Sheet flooring, cream	Room 1, floor, 2 nd layer down, under particle board	None Detected	Friable	
2956-35	Sheet flooring, gray mosaic	South hall, floor, 2 nd layer down, under particle board	None Detected	Friable	
2956-36	Sheet flooring, tan & black	South hall, floor, 2 nd layer down, under particle board	None Detected	Friable	
2 nd layerglue, brown	""	None Detected	Friable	
2956-37	Sheet flooring, green & black	Room 5, floor, 2 nd layer down, under particle board	None Detected	Friable	

**TABLE 2
SUMMARY OF ANALYTIC DATA**

2956 "D" Street, Eureka, CA

BOLD TYPE used to highlight asbestos. Note: Some samples had multiple layers, as analyzed

Sample Number	Sample Description (each layer)	Location	Asbestos % and Type	Friable vs. Non-Friable	Comments
2956-38	Sheet flooring, tan & brown	Room 8, floor, 2nd layer down, under particle board	10% CH	Friable	
2956-39	Tarpaper, black	North hall, on subfloor	None Detected	Friable	
2956-40	Stucco, white top coat & gray rough coat	Exterior, siding	None Detected	Non-Friable	
2956-41	Stucco, white top coat & gray rough coat	Exterior, siding	None Detected	Non-Friable	
2956-42	Stucco, white top coat & gray rough coat	Exterior, siding	None Detected	Non-Friable	
2956-43	Stucco, white top coat & gray rough coat	Exterior, siding	None Detected	Non-Friable	
2956-44	Stucco, white top coat	Exterior, siding	None Detected	Non-Friable	
2956-45	Stucco, tan top coat & gray rough coat	Exterior, siding	None Detected	Non-Friable	
2956-46	Stucco, tan top coat & gray rough coat	Exterior, siding	None Detected	Non-Friable	
2956-47	Stucco, tan top coat & gray rough coat	Exterior, siding	None Detected	Non-Friable	

CH = Chrysotile asbestos

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

ACM = Asbestos containing material.

PACM= Presumed ACM. See below.

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

**TABLE 3
XRF PAINT SAMPLING DATA**

2956 "D" Street, Eureka, CA

Reading #	Sample Location	Component Description	Substrate	Surface Coating Material	Color	Lead Concentration (mg/cm ²)	Paint Classification
1	Calibration	Standard Reference Material 1.04 mg/cm ² ±0.064	See Footnotes For Response Verification Check Range			0.9	NA
2	Calibration	Standard Reference Material 1.04 mg/cm ² ±0.064	--	--	--	0.9	NA
3	Calibration	Standard Reference Material 1.04 mg/cm ² ±0.064	--	--	--	0.9	NA
4	Exterior, east wall	Siding	Stucco	Paint	Tan	-0.3	NEG
5	Exterior, east wall	Window sill	Wood	Paint	Tan	0.6	LCSC
6	Exterior, east wall	Window Jamb	Wood	Paint	Blue	2.0	LBP
7	Exterior, south wall	Siding	Stucco	Paint	Tan	0.7	LCSC
8	Exterior, south wall	Siding	Stucco	Paint	Tan	-0.3	NEG
9	Exterior, south wall	Siding	Stucco	Paint	Tan	0.0	NEG
10	Exterior, west wall	Siding	Stucco	Paint	Tan	0.0	NEG
11	Exterior, west wall	Siding	Stucco	Paint	Tan	0.0	NEG
12	Exterior, north wall	Siding	Stucco	Paint	Tan	0.7	LCSC

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)

Surface Coating Material: P=Paint S=Stain T=Tile Glaze

N-wall = north wall S-wall = south wall E-wall = east wall W-wall = west wall I-wall = interior wall

TABLE 3
XRF PAINT SAMPLING DATA
2956 "D" Street, Eureka, CA

Reading #	Sample Location	Component Description	Substrate	Surface Coating Material	Color	Lead Concentration (mg/cm ²)	Paint Classification
13	Exterior, north side	Window sill	Wood	Paint	Tan	0.8	LCSC
14	Exterior, south side	Window trim	Wood	Paint	Tan	0.0	NEG
15	Exterior, east side	Door	Metal	Paint	Blue	0.1	LCSC
16	Room 1	Door jamb	Wood	Paint	Lt. Blue	-0.2	NEG
17	Restroom 1	Wall	Drywall	Paint	White	0.0	NEG
18	Room 8	Wall	Drywall	Paint	Lt. Blue	0.0	NEG
19	South hall	Wall	Drywall	Paint	Lt. Green	0.0	NEG
20	South hall	Wair.scot	Wood	Paint	Tan	-0.1	NEG
21	Room 7	Wair.scot	Wood	Paint	White	-0.1	NEG
22	Room 1	Wainscot	Wood	Paint	Lt. Blue	-0.1	NEG
23	Room 1	Door	Wood	Paint	Lt. Blue	-0.1	NEG
24	South hall	Door trim	Wood	Paint	Lt. Blue	-0.1	NEG
25	Room 3	Window trim	Wood	Paint	Lt. Blue	0.0	NEG
26	Room 1	Window jamb	Wood	Paint	Lt. Blue	-0.1	NEG

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)

Surface Coating Material: P=Paint S=Stain T=Tile Glaze

N-wall = north wall S-wall = south wall E-wall = east wall W-wall = west wall I-wall = interior wall

TABLE 3
XRF PAINT SAMPLING DATA
 2956 "D" Street, Eureka, CA

Reading #	Sample Location	Component Description	Substrate	Surface Coating Material	Color	Lead Concentration (mg/cm ²)	Paint Classification
27	Room 6	Window sill	Wood	Paint	Tan	-0.1	NEG
28	Room 7	Door	Wood	Paint	Tan	-0.1	NEG
29	Calibration	Standard Reference Material 1.04 mg/cm ² ±0.064	See Footnotes For Response Verification Check Range			0.9	NA
30	Calibration	Standard Reference Material 1.04 mg/cm ² ±0.064				0.9	NA
31	Calibration	Standard Reference Material 1.04 mg/cm ² ±0.064				0.9	NA
<p>XRF Lead Paint Analyzer: Heuresis Corp. Model: Pb200i Serial# 1566</p> <p>Calibration: Standard Reference Material: 1.04 mg/cm² ±0.064 Response Verification Check Range: 0.8 to 1.2 mg/cm² Note: for Performance Characteristic Sheet (PCS) compliance, the average of three calibration readings must fall within the "Response Verification Check Range."</p>							

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)

Surface Coating Material: P=Paint S=Stain T=Tile Glaze

N-wall = north wall S-wall = south wall E-wall = east wall W-wall = west wall I-wall = interior wall

AMERSCI

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

Date Received 01/10/18
Date Examined 01/10/18

AmeriSci Job # 918011211
P.O. #
Page 1 of 11

RE: 1800302; 2956 "D" St. Eureka, CA

Arcata, CA 95518

Client No. / HGA	Lab No.	Asbestos Present	Total % Asbestos
2956-1 Location: JC/GB / Rm 7 / Wall	918011211-01.1	No	NAD (by CVES) by John A. Lopez on 01/10/18
Analyst Description: White, Heterogeneous, Non-Fibrous, Joint Compound Asbestos Types: Other Material: Non-fibrous 100 %			
2956-1 Location: JC/GB / Rm 7 / Wall	918011211-01.2	No	NAD (by CVES) by John A. Lopez on 01/10/18
Analyst Description: White, Heterogeneous, Fibrous, Gypsum Board Asbestos Types: Other Material: Cellulose 4 %, Gypsum 96 %			
2956-2 Location: JC/GB / JC/GB / KN / Wall	918011211-02.1	No	NAD (by CVES) by John A. Lopez on 01/10/18
Analyst Description: White, Homogeneous, Non-Fibrous, Joint Compound Asbestos Types: Other Material: Non-fibrous 100 %			
2956-2 Location: JC/GB / JC/GB / KN / Wall	918011211-02.2	No	NAD (by CVES) by John A. Lopez on 01/10/18
Analyst Description: White, Heterogeneous, Fibrous, Gypsum Board Asbestos Types: Other Material: Cellulose 3 %, Gypsum 97 %			
2956-3 Location: JC/GB / JC/GB / KN / Wall	918011211-03.1	No	NAD (by CVES) by John A. Lopez on 01/10/18
Analyst Description: Off-White, Homogeneous, Non-Fibrous, Joint Compound Asbestos Types: Other Material: Non-fibrous 100 %			

Client Name: Brunelle & Clark Consulting, LLC

PLM Bulk Asbestos Report

1800302; 2956 "D" St. Eureka, CA

Client No. / HGA	Lab No.	Asbestos Present	Total % Asbestos
2956-3 Location: JC/GB / JC/GB / KN / Wall	918011211-03.2	No	NAD (by CVES) by John A. Lopez on 01/10/18
Analyst Description: White, Heterogeneous, Fibrous, Gypsum Board			
Asbestos Types:			
Other Material: Cellulose 5 %, Gypsum 95 %			
2956-4 Location: JC/GB / Rm 1 / Wall	918011211-04.1	No	NAD (by CVES) by John A. Lopez on 01/10/18
Analyst Description: Off-White, Homogeneous, Non-Fibrous, Joint Compound			
Asbestos Types:			
Other Material: Non-fibrous 100 %			
2956-4 Location: JC/GB / Rm 1 / Wall	918011211-04.2	No	NAD (by CVES) by John A. Lopez on 01/10/18
Analyst Description: White, Heterogeneous, Fibrous, Gypsum Board			
Asbestos Types:			
Other Material: Cellulose 5 %, Gypsum 95 %			
2956-5 Location: JC/GB / Rm 2 / Wall	918011211-05.1	No	NAD (by CVES) by John A. Lopez on 01/10/18
Analyst Description: Off-White, Homogeneous, Non-Fibrous, Joint Compound			
Asbestos Types:			
Other Material: Non-fibrous 100 %			
2956-5 Location: JC/GB / Rm 2 / Wall	918011211-05.2	No	NAD (by CVES) by John A. Lopez on 01/10/18
Analyst Description: White, Heterogeneous, Fibrous, Gypsum Board			
Asbestos Types:			
Other Material: Fibrous glass 4 %, Gypsum 96 %			
2956-6 Location: JC/GB / S. Hall / Ceiling	918011211-06.1	No	NAD (by CVES) by John A. Lopez on 01/10/18
Analyst Description: Off-White, Homogeneous, Non-Fibrous, Joint Compound			
Asbestos Types:			
Other Material: Non-fibrous 100 %			

Client Name: Brunelle & Clark Consulting, LLC

PLM Bulk Asbestos Report

1800302; 2956 "D" St. Eureka, CA

Client No. / HGA	Lab No.	Asbestos Present	Total % Asbestos
2956-6 Location: JC/GB / S. Hall / Ceiling	918011211-06.2	No	NAD (by CVES) by John A. Lopez on 01/10/18
Analyst Description: White, Homogeneous, Non-Fibrous, Gypsum Board Asbestos Types: Other Material: Gypsum 100 %			
2956-7 Location: JC/GB / RR 3 / Wall	918011211-07.1	No	NAD (by CVES) by John A. Lopez on 01/10/18
Analyst Description: White, Homogeneous, Non-Fibrous, Joint Compound Asbestos Types: Other Material: Non-fibrous 100 %			
2956-7 Location: JC/GB / RR 3 / Wall	918011211-07.2	No	NAD (by CVES) by John A. Lopez on 01/10/18
Analyst Description: Tan, Heterogeneous, Fibrous, Gypsum Board Asbestos Types: Other Material: Fibrous glass 5 %, Gypsum 95 %			
2956-8 2 Location: Texture, Knockdown / KN / Wall	918011211-08	No	NAD (by CVES) by John A. Lopez on 01/10/18
Analyst Description: White/Green, Heterogeneous, Non-Fibrous, Texture Asbestos Types: Other Material: Non-fibrous 100 %			
2956-9 2 Location: Texture, Knockdown / Rm 2 / Wall	918011211-09	No	NAD (by CVES) by John A. Lopez on 01/10/18
Analyst Description: White, Heterogeneous, Non-Fibrous, Texture Asbestos Types: Other Material: Non-fibrous 100 %			
2956-10 2 Location: Texture, Knockdown / RR 2 / Ceiling	918011211-10	No	NAD (by CVES) by John A. Lopez on 01/10/18
Analyst Description: White, Heterogeneous, Non-Fibrous, Texture Asbestos Types: Other Material: Non-fibrous 100 %			

Client Name: Brunelle & Clark Consulting, LLC

PLM Bulk Asbestos Report

1800302; 2956 "D" St. Eureka, CA

Client No. / HGA	Lab No.	Asbestos Present	Total % Asbestos
2956-11 2	918011211-11 Location: Texture, Knockdown / Rm 8 / Wall	No	NAD (by CVES) by John A. Lopez on 01/10/18
Analyst Description: White, Heterogeneous, Non-Fibrous, Texture			
Asbestos Types:			
Other Material: Non-fibrous 100 %			
2956-12 2	918011211-12 Location: Texture, Knockdown / Rm 6 / Wall	No	NAD (by CVES) by John A. Lopez on 01/10/18
Analyst Description: White, Homogeneous, Non-Fibrous, Texture			
Asbestos Types:			
Other Material: Non-fibrous 100 %			
2956-13 3	918011211-13 Location: Insulation, Blown In, Wht / Attic	No	NAD (by CVES) by John A. Lopez on 01/10/18
Analyst Description: White, Homogeneous, Fibrous, Insulation			
Asbestos Types:			
Other Material: Fibrous glass 100 %			
2956-14 3	918011211-14 Location: Insulation, Blown In, Wht / Attic	No	NAD (by CVES) by John A. Lopez on 01/10/18
Analyst Description: White, Homogeneous, Fibrous, Insulation			
Asbestos Types:			
Other Material: Fibrous glass 100 %			
2956-15 4	918011211-15 Location: Plaster, Single Coat, Wht / Attic / Firewall	No	NAD (by CVES) by John A. Lopez on 01/10/18
Analyst Description: White, Homogeneous, Non-Fibrous, Plaster			
Asbestos Types:			
Other Material: Non-fibrous 100 %			
2956-16 4	918011211-16 Location: Plaster, Single Coat, Wht / Attic / Firewall	No	NAD (by CVES) by John A. Lopez on 01/10/18
Analyst Description: White, Homogeneous, Non-Fibrous, Plaster			
Asbestos Types:			
Other Material: Non-fibrous 100 %			

Client Name: Brunelle & Clark Consulting, LLC

PLM Bulk Asbestos Report

1800302; 2956 "D" St. Eureka, CA

Client No. / HGA	Lab No.	Asbestos Present	Total % Asbestos
2956-17 4	918011211-17 Location: Plaster, Single Coat, Wht / Attic / Floor	No	NAD (by CVES) by John A. Lopez on 01/10/18
Analyst Description: White, Homogeneous, Non-Fibrous, Plaster Asbestos Types: Other Material: Cellulose 2 %, Non-fibrous 98 %			
2956-18	918011211-18 Location: Buttonboard, Gypsum / Attic / Floor	No	NAD (by CVES) by John A. Lopez on 01/10/18
Analyst Description: White, Heterogeneous, Fibrous, Buttonboard Asbestos Types: Other Material: Cellulose 10 %, Gypsum 90 %			
2956-19 6	918011211-19L1 Location: SF, Gray Mosaic (Type 1) / RR 2 / Floor	No	NAD (by CVES) by John A. Lopez on 01/10/18
Analyst Description: Grey/White, Heterogeneous, Fibrous, Sheet Flooring Asbestos Types: Other Material: Cellulose 5 %, Non-fibrous 95 %			
2956-19 6	918011211-19L2 Location: SF, Gray Mosaic (Type 1) / RR 2 / Floor	No	NAD (by CVES) by John A. Lopez on 01/10/18
Analyst Description: Off-White, Heterogeneous, Non-Fibrous, Glue Asbestos Types: Other Material: Non-fibrous 100 %			
2956-20 6	918011211-20 Location: SF, Gray Mosaic (Type 1) / RR 2 / Floor	No	NAD (by CVES) by John A. Lopez on 01/10/18
Analyst Description: Grey/White, Heterogeneous, Fibrous, Sheet Flooring Asbestos Types: Other Material: Cellulose 4 %, Non-fibrous 96 %			
2956-21 7	918011211-21L1 Location: SF, Gray Mosaic (Type 2) / RR 1 / Floor	No	NAD (by CVES) by John A. Lopez on 01/10/18
Analyst Description: White/Beige, Heterogeneous, Fibrous, Sheet Flooring Asbestos Types: Other Material: Fibrous glass 5 %, Non-fibrous 95 %			

Client Name: Brunelle & Clark Consulting, LLC

PLM Bulk Asbestos Report

1800302; 2956 "D" St. Eureka, CA

Client No. / HGA	Lab No.	Asbestos Present	Total % Asbestos
2956-21 7	918011211-21L2 Location: SF, Gray Mosaic (Type 2) / RR 1 / Floor	No	NAD (by CVES) by John A. Lopez on 01/10/18
Analyst Description: Yellow, Heterogeneous, Non-Fibrous, Glue Asbestos Types: Other Material: Non-fibrous 100 %			
2956-22 7	918011211-22 Location: SF, Gray Mosaic (Type 2) / KN / Floor	No	NAD (by CVES) by John A. Lopez on 01/10/18
Analyst Description: Beige/White, Heterogeneous, Non-Fibrous, Sheet Flooring Asbestos Types: Other Material: Fibrous glass 5 %, Non-fibrous 95 %			
2956-23 8	918011211-23 Location: SF, Brown Octagon / N. Hall Closet / Floor	Yes	15 % (by CVES) by John A. Lopez on 01/10/18
Analyst Description: Off-White/Brown, Heterogeneous, Fibrous, Sheet Flooring Asbestos Types: Chrysotile 15.0 % Other Material: Non-fibrous 85 %			
2956-24 8	918011211-24 Location: SF, Brown Octagon / N. Hall Closet / Floor		NA/PS
Analyst Description: Sheet Flooring Asbestos Types: Other Material:			
2956-25 9	918011211-25L1 Location: SF, Gray / RR 3 / Floor / Top Layer	No	NAD (by CVES) by John A. Lopez on 01/10/18
Analyst Description: Off-White, Heterogeneous, Fibrous, Sheet Flooring Asbestos Types: Other Material: Cellulose 5 %, Non-fibrous 95 %			
2956-25 9	918011211-25L2 Location: SF, Gray / RR 3 / Floor / Top Layer	No	NAD (by CVES) by John A. Lopez on 01/10/18
Analyst Description: Cream, Heterogeneous, Non-Fibrous, Glue Asbestos Types: Other Material: Cellulose 3 %, Non-fibrous 97 %			

Client Name: Brunelle & Clark Consulting, LLC

PLM Bulk Asbestos Report

1800302; 2956 "D" St. Eureka, CA

Client No. / HGA	Lab No.	Asbestos Present	Total % Asbestos
2956-26 9	918011211-26L1 Location: SF, Gray / RR 3 / Floor / Top Layer	No	NAD (by CVES) by John A. Lopez on 01/10/18
Analyst Description: Off-White, Heterogeneous, Fibrous, Sheet Flooring			
Asbestos Types:			
Other Material: Cellulose 15 %, Non-fibrous 85 %			
2956-26 9	918011211-26L2 Location: SF, Gray / RR 3 / Floor / Top Layer	No	NAD (by CVES) by John A. Lopez on 01/10/18
Analyst Description: Yellow/Tan, Heterogeneous, Non-Fibrous, Glue			
Asbestos Types:			
Other Material: Non-fibrous 100 %			
2956-27 10	918011211-27L1 Location: SF, Gray Mosaic (Type 3) / RR 3 / Floor / Bottom Layer	No	NAD (by CVES) by John A. Lopez on 01/10/18
Analyst Description: Off-White, Heterogeneous, Fibrous, Sheet Flooring			
Asbestos Types:			
Other Material: Cellulose 5 %, Non-fibrous 95 %			
2956-27 10	918011211-27L2 Location: SF, Gray Mosaic (Type 3) / RR 3 / Floor / Bottom Layer	No	NAD (by CVES) by John A. Lopez on 01/10/18
Analyst Description: Beige/Yellow, Heterogeneous, Non-Fibrous, Glue			
Asbestos Types:			
Other Material: Cellulose 3 %, Non-fibrous 97 %			
2956-28 10	918011211-28L1 Location: SF, Gray Mosaic (Type 3) / RR 3 / Floor / Bottom Layer	No	NAD (by CVES) by John A. Lopez on 01/10/18
Analyst Description: Grey/Off-White, Heterogeneous, Fibrous, Sheet Flooring			
Asbestos Types:			
Other Material: Cellulose 5 %, Non-fibrous 95 %			
2956-28 10	918011211-28L2 Location: SF, Gray Mosaic (Type 3) / RR 3 / Floor / Bottom Layer	No	NAD (by CVES) by John A. Lopez on 01/10/18
Analyst Description: Yellow, Heterogeneous, Non-Fibrous, Glue			
Asbestos Types:			
Other Material: Non-fibrous 100 %			

PLM Bulk Asbestos Report

1800302; 2956 "D" St. Eureka, CA

Client No. / HGA	Lab No.	Asbestos Present	Total % Asbestos
2956-29 Location: Floor Leveling, Gray / RR 3 / Threshold	918011211-29L1	No	NAD (by CVES) by John A. Lopez on 01/10/18
Analyst Description: Grey, Homogeneous, Non-Fibrous, Floor Leveling			
Asbestos Types:			
Other Material: Non-fibrous 100 %			
2956-29 Location: Floor Leveling, Gray / RR 3 / Threshold	918011211-29L2	No	NAD (by CVES) by John A. Lopez on 01/10/18
Analyst Description: Yellow, Homogeneous, Non-Fibrous, Glue			
Asbestos Types:			
Other Material: Cellulose 2 %, Non-fibrous 98 %			
2956-30 Location: SF, Cream / KN / 2nd Layer / Under Particle Bd.	918011211-30L1	No	NAD (by CVES) by John A. Lopez on 01/10/18
Analyst Description: Off-White, Heterogeneous, Fibrous, Sheet Flooring			
Asbestos Types:			
Other Material: Cellulose 15 %, Non-fibrous 85 %			
2956-30 Location: SF, Cream / KN / 2nd Layer / Under Particle Bd.	918011211-30L2	No	NAD (by CVES) by John A. Lopez on 01/10/18
Analyst Description: Orange/Beige, Heterogeneous, Non-Fibrous, Glue			
Asbestos Types:			
Other Material: Non-fibrous 100 %			
2956-31 Location: SF, Brown Octagon / KN / 3rd Layer / Under Two Layers Of Wood	918011211-31	Yes	10 % (by CVES) by John A. Lopez on 01/10/18
Analyst Description: Orange/Tan, Heterogeneous, Fibrous, Sheet Flooring			
Asbestos Types: Chrysotile 10.0 %			
Other Material: Non-fibrous 90 %			
2956-32 Location: Tarpaper, Brown / KN / On Subfloor	918011211-32	No	NAD (by CVES) by John A. Lopez on 01/10/18
Analyst Description: Brown/Black, Heterogeneous, Fibrous, Tar Paper			
Asbestos Types:			
Other Material: Cellulose 95 %, Non-fibrous 5 %			

Client Name: Brunelle & Clark Consulting, LLC

PLM Bulk Asbestos Report

1800302; 2956 "D" St. Eureka, CA

Client No. / HGA	Lab No.	Asbestos Present	Total % Asbestos
2956-33 15	918011211-33 Location: SF, Cream / Rm 1 / 2nd Layer / Under Particle Bd	No	NAD (by CVES) by John A. Lopez on 01/10/18
Analyst Description: Off-White, Heterogeneous, Non-Fibrous, Sheet Flooring			
Asbestos Types:			
Other Material: Cellulose 10 %, Non-fibrous 90 %			
2956-34 15	918011211-34 Location: SF, Cream / RR 1 / 2nd Layer / Under Particle Bd.	No	NAD (by CVES) by John A. Lopez on 01/10/18
Analyst Description: Off-White, Heterogeneous, Non-Fibrous, Sheet Flooring			
Asbestos Types:			
Other Material: Cellulose 4 %, Non-fibrous 96 %			
2956-35 15	918011211-35 Location: SF, Gray Mosaic / S. Hall / 2nd Layer / Under Particle Bd	No	NAD (by CVES) by John A. Lopez on 01/10/18
Analyst Description: Grey/Off-White, Heterogeneous, Fibrous, Sheet Flooring			
Asbestos Types:			
Other Material: Cellulose 4 %, Non-fibrous 96 %			
2956-36 15	918011211-36L1 Location: SF, Tan & Black / S. Hall / 2nd Layer / Under Particle Bd	No	NAD (by CVES) by John A. Lopez on 01/10/18
Analyst Description: Yellow/Black, Heterogeneous, Fibrous, Sheet Flooring			
Asbestos Types:			
Other Material: Cellulose 15 %, Non-fibrous 85 %			
2956-36 15	918011211-36L2 Location: SF, Tan & Black / S. Hall / 2nd Layer / Under Particle Bd	No	NAD (by CVES) by John A. Lopez on 01/10/18
Analyst Description: Brown, Heterogeneous, Non-Fibrous, Glue			
Asbestos Types:			
Other Material: Non-fibrous 100 %			
2956-37 15	918011211-37 Location: SF, Green & Black / Rm 5 / 2nd Layer / Under Particle Bd	No	NAD (by CVES) by John A. Lopez on 01/10/18
Analyst Description: Green/Black, Heterogeneous, Fibrous, Sheet Flooring			
Asbestos Types:			
Other Material: Cellulose 5 %, Non-fibrous 95 %			

Client Name: Brunelle & Clark Consulting, LLC

PLM Bulk Asbestos Report

1800302; 2956 "D" St. Eureka, CA

Client No. / HGA	Lab No.	Asbestos Present	Total % Asbestos
2956-38	918011211-38	Yes	10 %
Location: SF, Tan & Brown / Rm 8 / 2nd Layer / Under Particle Bd			(by CVES) by John A. Lopez on 01/10/18
Analyst Description: Tan/Cream, Heterogeneous, Fibrous, Sheet Flooring			
Asbestos Types: Chrysotile 10.0 %			
Other Material: Non-fibrous 90 %			
2956-39	918011211-39	No	NAD
Location: Tar Paper, Black / N. Hall / On Subfloor			(by CVES) by John A. Lopez on 01/10/18
Analyst Description: Black, Heterogeneous, Fibrous, Tar Paper			
Asbestos Types:			
Other Material: Cellulose 100 %			
2956-40 21	918011211-40	No	NAD
Location: Stucco; Wht TC Gray RC / Exterior / Siding			(by CVES) by John A. Lopez on 01/10/18
Analyst Description: Grey/Tan/White, Heterogeneous, Non-Fibrous, Cementitious, Stucco			
Asbestos Types:			
Other Material: Non-fibrous 100 %			
2956-41 21	918011211-41	No	NAD
Location: Stucco; Wht TC Gray RC / Exterior / Siding			(by CVES) by John A. Lopez on 01/10/18
Analyst Description: Grey/Tan/White, Heterogeneous, Non-Fibrous, Stucco			
Asbestos Types:			
Other Material: Non-fibrous 100 %			
2956-42 21	918011211-42	No	NAD
Location: Stucco; Wht TC Gray RC / Exterior / Siding			(by CVES) by John A. Lopez on 01/10/18
Analyst Description: Grey/Tan/White, Homogeneous, Non-Fibrous, Stucco			
Asbestos Types:			
Other Material: Non-fibrous 100 %			
2956-43 21	918011211-43	No	NAD
Location: Stucco; Wht TC Gray RC / Exterior / Siding			(by CVES) by John A. Lopez on 01/10/18
Analyst Description: Grey/Tan/White, Homogeneous, Non-Fibrous, Stucco			
Asbestos Types:			
Other Material: Non-fibrous 100 %			

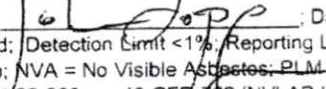
Client Name: Brunelle & Clark Consulting, LLC

PLM Bulk Asbestos Report

1800302; 2956 "D" St. Eureka, CA

Client No. / HGA	Lab No.	Asbestos Present	Total % Asbestos
2956-44 Location: Stucco, Top Coat, White / Exterior / Siding	918011211-44	No	NAD (by CVES) by John A. Lopez on 01/10/18
Analyst Description: White, Homogeneous, Non-Fibrous, Stucco Asbestos Types: Other Material: Non-fibrous 100 %			
2956-45 22 Location: Stucco; Tan TC / Gray RC / Exterior / Siding	918011211-45	No	NAD (by CVES) by John A. Lopez on 01/10/18
Analyst Description: Grey/Yellow, Heterogeneous, Non-Fibrous, Cementitious, Stucco Asbestos Types: Other Material: Non-fibrous 100 %			
2956-46 22 Location: Stucco; Tan TC / Gray RC / Exterior / Siding	918011211-46	No	NAD (by CVES) by John A. Lopez on 01/10/18
Analyst Description: Grey/Yellow, Homogeneous, Non-Fibrous, Stucco Asbestos Types: Other Material: Non-fibrous 100 %			
2956-47 22 Location: Stucco; Tan TC / Gray RC / Exterior / Siding	918011211-47	No	NAD (by CVES) by John A. Lopez on 01/10/18
Analyst Description: Grey/Yellow, Homogeneous, Non-Fibrous, Stucco Asbestos Types: Other Material: Non-fibrous 100 %			

Reporting Notes:

Analyzed By: John A. Lopez ; Date Analyzed: 1/10/2018 1-11-18
 *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, CA ELAP lab #2322); Note: PLM is not consistently reliable in detecting asbestos in floor coverings and similar non-organic 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: 

918011211

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/5days	BRUNELLE & CLARK CONSULTING, LLC P.O. Box 1138 Arcata, CA 95518 Ph: (707) 822-4058 Cell #: (707) 672-5345 zbconsult@outlook.com	Date: 1/7/18 Site: 2956 th D th St. Eureka, CA Proj.# 1800302
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BULK ASBESTOS SAMPLING

Sample No.	Sample Description	Hom, Area	Location	Mat'l Type	Mat'l Cond.	Friable
2956-1	JC/GB	1	Rm 7 / wall	MM	DG	NF
- 2	JC/GB / JC/GB	1/2	KN /			
- 3	JC/GB / JC/GB	1/2	↓ /			
- 4	JC/GB	1	Rm 1 /			
- 5		1	Rm 2 / ↓			
- 6		1	S. Hall / ceiling			
- 7		1	RR3 / wall			
- 8	Texture, knockdown	2	KN / wall	SM		
- 9		2	Rm 2 / ↓			
- 10		2	RR2 / ceiling			
- 11	Texture, knockdown	2	Rm 8 / wall			
- 12		2	Rm 6 / ↓			
- 13	Insulation, blown in, wht	3	Attic	TSI	ND	F
- 14		3				
- 15	Plaster, single coat, wht	4	↓ / firewall	SM	DG	NF

Sample Abbreviations
 VFT/M = Vinyl Floor Tile & Mastic
 SF = Sheet Flooring
 JC/GB = Joint Compound/Gypsum Board
 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

Material Condition
 Not Damaged = ND
 Damaged = DG
 Significantly Damaged = SD
 Potentially Significantly Damaged = PSD

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

Sampled by: Zindar Brunelle	Received by: K.V.
Relinquished by: Zindar Brunelle	Date/time: 1/10/18 2:0800
Date/Time: 1/8/18	Date/Time: 1/10/18 2:0800

914011211

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/5days	BRUNELLE & CLARK CONSULTING, LLC P.O. Box 1138 Arcata, CA 95518 Ph: (707) 822-4058 Cell #: (707) 672-5345 zbconsult@outlook.com	Date: 1/7/18 Site: 2956 D St. Eureka, CA Proj.# 1800302
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BULK ASBESTOS SAMPLING

Sample No.	Sample Description	Hom. Area	Location	Mat'l Type	Mat'l Cond.	Friable
2956-16	Plaster, single coat, wht	4	Attic/firewall	SM	DG	NF
-17	↓	4	↓ / floor	↓	↓	↓
-18	Buttonboard, gypsum	5	↓ / ↓	MM	↓	↓
-19	SF, gray mosaic (Type 1)	6	RR2 / ↓	↓	↓	F
-20	↓	6	↓ / ↓	↓	↓	↓
-21	SF, gray mosaic (Type 2)	7	RR1 / ↓	↓	↓	↓
-22	↓	7	KN / ↓	↓	↓	↓
-23	SF, brown octagon	8	N. Hall Closet / floor	↓	↓	↓
-24	↓	8	↓ / ↓	↓	↓	↓
-25	SF, gray	9	RR3 / floor / Top Layer	↓	↓	↓
-26	↓	9	↓ / ↓	↓	↓	↓
-27	SF, gray mosaic (Type 3)	10	↓ / ↓ / Bottom Layer	↓	↓	↓
-28	↓	10	↓ / ↓ / ↓	↓	↓	↓
-29	Floor leveling, gray	11	↓ / threshold	↓	↓	NF
30	SF, cream	12	KN / 2nd Layer / under particle bd.	↓	ND	F

Sample Abbreviations
 VFT/M = Vinyl Floor Tile & Mastic
 SF = Sheet Flooring
 JC/GB = Joint Compound/Gypsum Board
 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

Material Condition
 Not Damaged = ND
 Damaged = DG
 Significantly Damaged = SD
 Potentially Significantly Damaged = PSD

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

Sampled by: Zindar Brunette	Received by: K. V.
Relinquished by: Zindar Brunette	Date/time: 1/10/18 @ 0800
Date/Time: 1/8/18	Date/Time: 1/10/18 @ 0800

918011211

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/5days	BRUNELLE & CLARK CONSULTING, LLC P.O. Box 1138 Arcata, CA 95518 Ph: (707) 822-4058 Cell #: (707) 672-5345 zbconsult@outlook.com	Date: 1/7/18 Site: 2956 D St. Eureka, CA Proj.# 1800302
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BULK ASBESTOS SAMPLING

Sample No.	Sample Description	Hom, Area	Location	Mat'l Type	Mat'l Cond.	Friable
2956-31	SF, brown octagon	13	KN / 3rd Layer / under two layers of wood	MM	ND	F
-32	Tarpaper, brown	14	↓ / on sub floor			
-33	SF, cream	15	Rm 1 / 2nd Layer / under particle bd			
-34	↓	15	RR 1 / / /			
-35	SF, gray mosaic	16	S. Hall / / /			
-36	SF, tan & black	17	↓ / / /			
-37	SF, green & black	18	Rm 5 / / /			
-38	SF, tan & brown	19	Rm 8 / ↓ / ↓			
-39	Tarpaper, black	20	N. Hall / on sub floor		↓	↓
-40	Stucco; ^{whit} TC / ^{gray} RC	21	Exterior / siding		ND	NF
-41	↓ / ↓	21	↓ / ↓			
-42	↓ / ↓	21	↓ / ↓			
-43	↓ / ↓	21	↓ / ↓			
-44	Stucco, Top coat, white	21	↓ / ↓	SM		
-45	Stucco; ^{Tan} TC / ^{gray} RC	22	↓ / ↓			

Sample Abbreviations
 VFT/M = Vinyl Floor Tile & Mastic
 SF = Sheet Flooring
 JC/GB = Joint Compound/Gypsum Board
 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

Material Condition
 Not Damaged = ND
 Damaged = DG
 Significantly Damaged - SD
 Potentially Significantly Damaged = PSD

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

Sampled by: Zindar Brunelle	Received by: [Signature]
Relinquished by: [Signature]	Date/Time: 1/10/18 @ 0800
Date/Time: 1/8/18	

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



COMPLIANCE ADVISORY ASBESTOS NESHAP APPLICABILITY TO DEMOLITION AND RENOVATION PROJECTS

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

Definitions

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

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

Renovation – altering a facility or one or more facility components in any way; this includes and is not limited to the stripping or removal of 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.

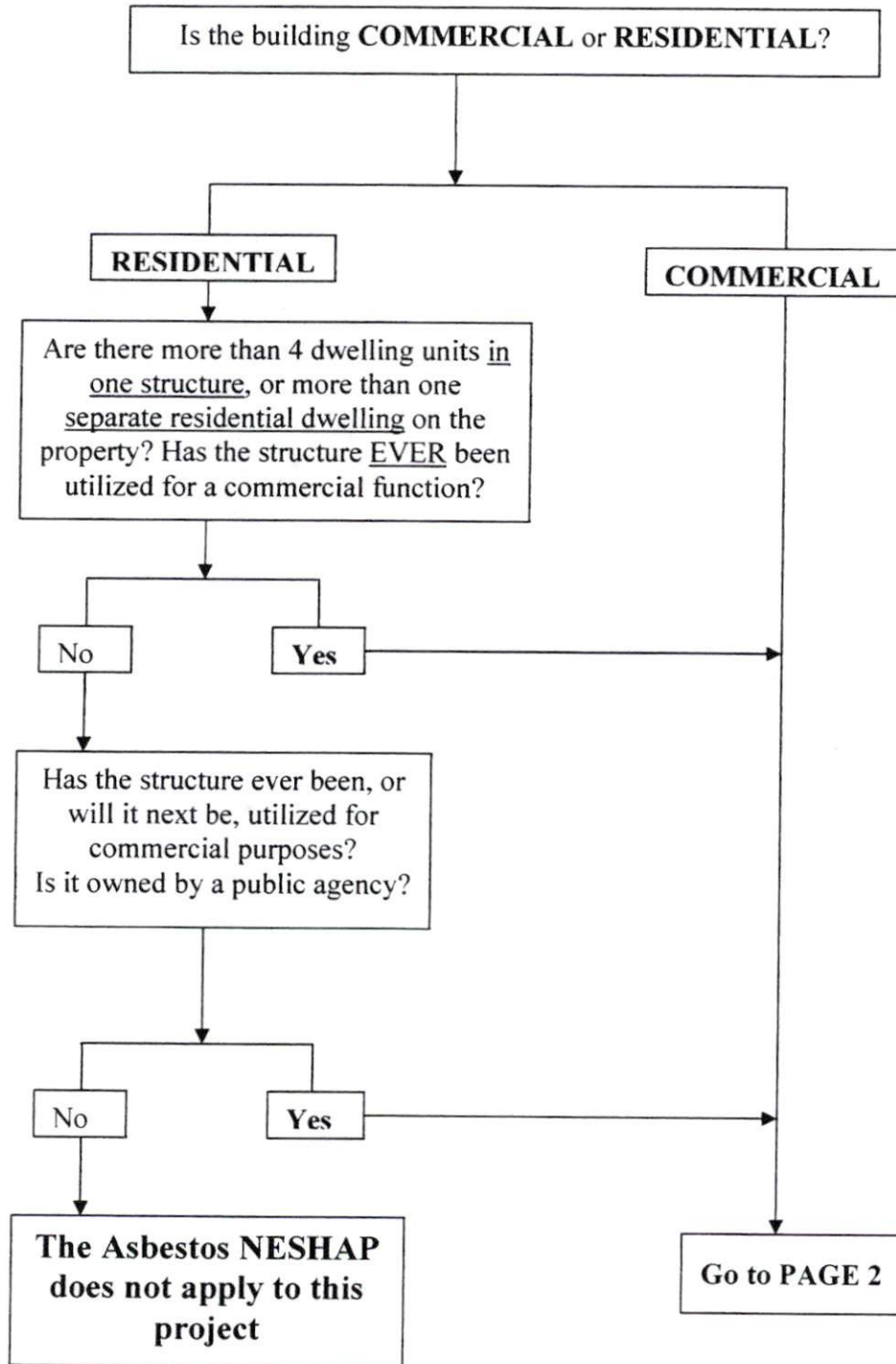
For a demolition - Upon completion of the asbestos survey, a demolition notification form must be submitted to the District at least 10 working days prior to the start date of the demolition. Notification of a demolition is required regardless of the amount of asbestos present. When asbestos-containing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

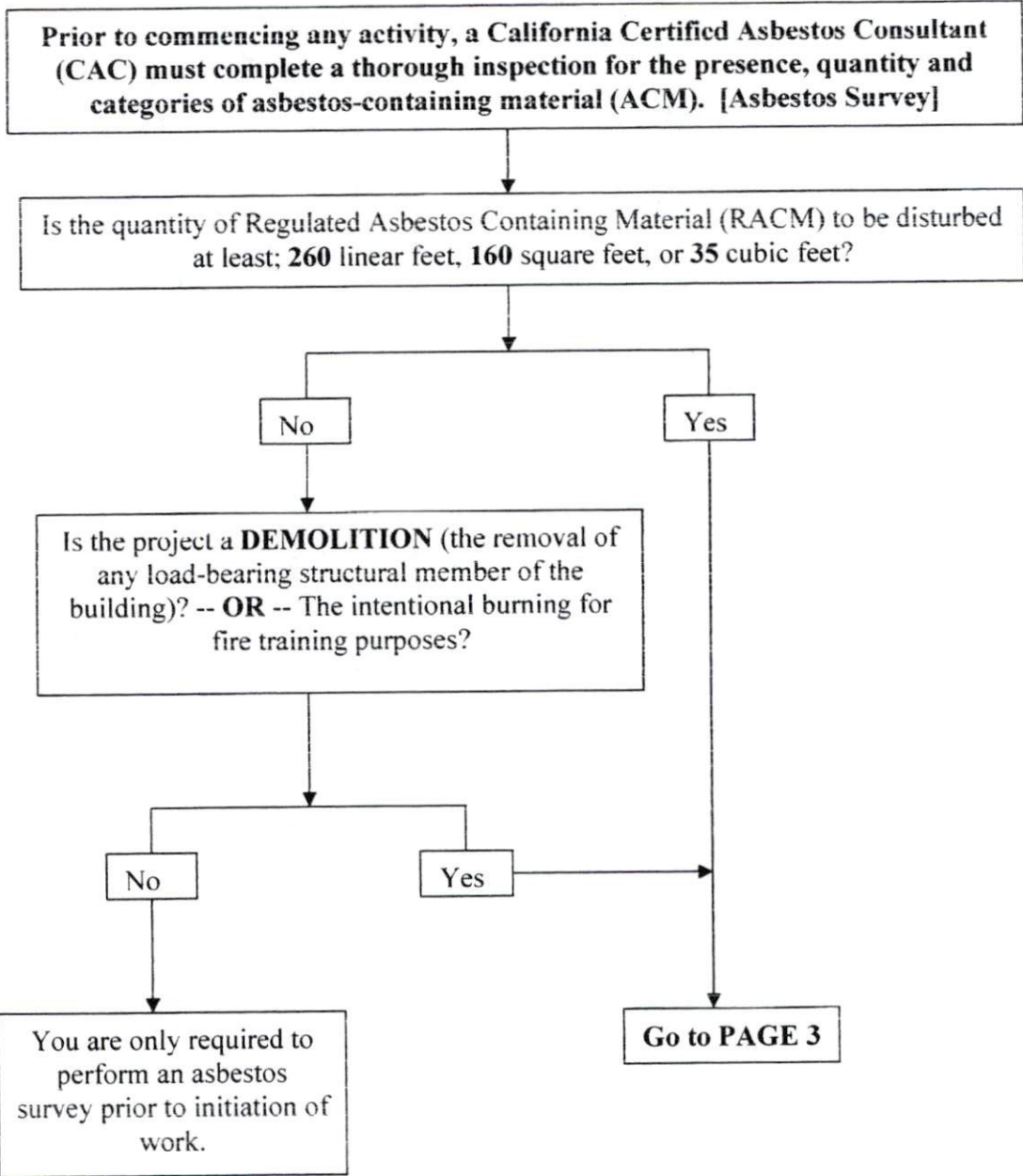
Other Training Requirements – *When removing or disturbing RACM, an AHERA-accredited Contractor/Supervisor must be present and all workers must be AHERA-accredited Workers (40 CFR 763, Subpart E, App. C). All training must be current.*

fViolations 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

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



**ASBESTOS DEMOLITION AND RENOVATION NOTIFICATION FORM
GENERAL INFORMATION**

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

This notification should be typewritten and postmarked or delivered no later than ten days prior to the beginning of the asbestos removal activity (dates specified in Section VIII) or demolition (dates specified in Section IX). Please submit the form, along with the appropriate fee, to:

**NORTH COAST UNIFIED AQMD
707 L STREET, EUREKA, CA 95501**

INSTRUCTIONS:

- I. Type of Notification: Enter "O" if the notification is a first time or original notification, "R" if the notification is a revision of a prior notification, or "C" if the activity has been cancelled.
- II. Facility Information: Enter the names, addresses, contact persons and telephone numbers of the following:
 - Owner: Legal owner of the site at which asbestos is being removed or demolition planned
 - Asbestos Removal Contractor: Certified asbestos contractor hired to remove asbestos (include DOSH registration #)
 - Other Demolition or Renovation Operator: Demolition contractor, general contractor, or other person who leases, operates, controls, or supervises the site (fire dept if training burn).
- III. Type of Operation: Enter "D" for facility demolition, "R" for facility renovation, "O" for ordered demolition, or "E" for emergency renovation. Fire training burns are considered facility demolitions ("D").
- IV. Is Asbestos Present?: Answer "yes" or "no" regardless of the amount of asbestos present.
- V. Facility Description: Provide detailed information on the areas being renovated or demolished. If applicable, provide the floor numbers and room numbers where renovations are to be conducted.
 - Site Location: Provide information needed to locate site in event that the address alone is inadequate.
 - Building Size: Provide in square meters or square feet.
 - No. of Floors: Enter the number of floors including basement or ground floors.
 - Age in Years: Enter approximate age of the facility.
 - Present Use / Prior Use: Describe the primary use of the facility or enter the following codes: H - hospital; S - school; P - public building; O - office; I - industrial; U - university or college; B - ship; C - commercial; or R - residential.
- VI. Asbestos Detection Procedure: Describe methods and procedures used to determine whether asbestos is present at the site, including a description of the analytical methods employed. **Building inspections must be performed by an AHERA-accredited Building Inspector** (40 CFR 763, Subpart E, App. C). Include copy of current accreditation. If an inspection report has been prepared by a consultant for the facility please include a copy with the notification.
- VII. Approximate Amount of Asbestos, Including: (1) Regulated asbestos containing material (RACM) to be removed (including nonfriable ACM to be sanded, ground, or abraded); (2) Category I ACM not removed; and (3) Category II ACM not removed. For both removals and demolition, enter the amount of RACM to be removed by entering a number in the appropriate box and an "X" for the unit. For demolition only, enter the amount of Category I and II nonfriable asbestos not to be removed in the appropriate boxes. Category I nonfriable material includes packing, gasket, resilient floor covering, and asphalt roofing materials containing more than one percent asbestos. Category II nonfriable material includes any material, excluding Category I products, containing more than one percent asbestos, that when dry, cannot be crumbled, pulverized, or reduced to powder. Facilities to be used for fire training purposes must have all materials containing more than one percent asbestos removed.
- VIII. Scheduled Dates of Asbestos Removal: Enter scheduled dates (month/day/year) for asbestos removal work. Asbestos removal work includes any activity, including site preparation, which may break up, dislodge, or disturb asbestos material. **These dates must be accurate.** Asbestos removal work occurring prior to the start date or after the end date is a violation and could result in substantial enforcement action. If these dates change, notify the District immediately, by submitting a revision request form.
- IX. Scheduled Dates of Demo/Renovation: Enter scheduled dates (month/day/year) for beginning and ending of the planned demolition or renovation. For fire training burns this is the time period when the actual fire training burn will take place. **These dates must be accurate.** Demolition or renovation activity occurring prior to the start date or after the end date is a violation and could result in substantial enforcement action. If these dates change, notify the District immediately, by submitting a revision request form.

- X. Description of Planned Demolition or Renovation Work, and Method(s) to be Used: Include here a description of the overall work being done and the techniques being used. A work plan can be attached to address this item.
- XI. Description of Engineering Controls and Work Practices to be Used to Control Emissions of Asbestos at the Demolition or Renovation Site: Describe the work practices and engineering controls selected to ensure compliance with the requirements of the regulation, including removal and waste handling emission control procedures. A work plan can be attached to address this item.
- XII. Waste Transporter(s): Enter the name, addresses, contact persons and telephone numbers of the persons or companies responsible for transporting ACM from the removal site to the waste disposal site. If the removal contractor or owner is the waste transporter, state "same as owner" or "same as removal contractor".
- XIII. Waste Disposal Site: Identify the waste disposal site, including the complete name, location, and telephone number of the facility. If ACM is to be disposed of at more than one site, provide complete information on an additional sheet submitted with the form.
- XIV. If Demolition Ordered by a Government Agency: Provide the name of the responsible official, title and agency, authority under which the order was issued, the dates of the order and the dates of the ordered demolition. Include a copy of the order with the notification.
- XV. Emergency Renovation Information: Provide the date and time of the emergency, a description of the event and a description of unsafe conditions, equipment damage or financial burden resulting from the event. The information should be detailed enough to evaluate whether a renovation falls within the emergency exception.
- XVI. Description of Procedures to be Followed in the Event that Unexpected Asbestos is Found or Previously Nonfriable Asbestos Material Becomes Crumbled, Pulverized, or Reduced to Powder: Provide adequate information to demonstrate that appropriate actions have been considered and can be implemented to control asbestos emissions adequately, including at a minimum, conformance with applicable work practice standards. Typically these will include a work stoppage, wetting of material, and notification to the District.
- XVII. Certification of Presence of Trained Supervisor: Certify that a person trained in asbestos removal procedures and the provisions of this regulation will be on-site and supervise the demolition or renovation. **When handling RACM, the supervisor must be a current AHERA-accredited contractor/supervisor, and the workers must be AHERA-accredited workers (40 CFR 763 Subpart E App. C).** The supervisor is responsible for the activity on-site. Evidence that the training has been completed by the supervisor must be available for inspection during normal business hours.
- XVIII. Verification: Please certify the accuracy and completeness of the information provided by signing and dating the notification form.

FEES AND OTHER REQUIREMENTS:

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

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

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

NORTH COAST UNIFIED AIR QUALITY MANAGEMENT DISTRICT

NOTIFICATION OF DEMOLITION OR RENOVATION SUBJECT TO 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:	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}						
VII. APPROXIMATE AMOUNT OF ASBESTOS, INCLUDING:						
1. Regulated ACM to be Removed		RACM To Be Removed	Nonfriable Asbestos Material To Be Removed		Indicate Unit of Measurement Below	
2. Category I ACM to be Removed			Category I	Category II		
3. Category II ACM to be Removed				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 DEMOLITION OR RENOVATION SITE (attach work plan, if appropriate):

XII. WASTE TRANSPORTER #1

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

WASTE TRANSPORTER #2

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

XIII. WASTE DISPOSAL SITE

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

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

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

XV. FOR EMERGENCY RENOVATIONS

Date and Hour of Emergency (mm/dd/yy): _____
 Description of the Sudden, Unexpected Event: _____
 Explanation of how the event caused unsafe conditions or would cause equipment damage or an unreasonable financial burden: _____

XVI. DESCRIPTION OF PROCEDURES TO BE FOLLOWED IN THE EVENT THAT UNEXPECTED ASBESTOS IS FOUND, OR 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.

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

Zindar Brunelle

Name

Certification No. **14-5295**

Expires on **10/15/18**

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

Certificate
Title

Expiration
Date

Inspector/Assessor **09/02/2018**
Supervisor **09/02/2018**



Zindar Brunelle

ID #: 25819

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 #: 20705
Course Date: 03/09/17

Expiration Date: 03/09/18

By *Neta Snider*
Authorized Signature: Neta Snider