

Brunelle & Clark Consulting, LLC

December 26, 2018

1800320

To: County of Humboldt
County Administrative Office
ADA Compliance Team
Attn: Mr. Travis I. Smith
825 5th Street, Room 112
Eureka, CA 95501

Re: Limited Asbestos Survey & Representative Paint Sampling for ADA Renovations, Humboldt County Coroner's Office, 720 Wood Street, Eureka, CA.

Dear Mr. Smith:

On November 30, 2018, this office conducted a limited asbestos sampling survey of materials to be disturbed for ADA renovations at the above referenced facility. Representative paint sampling for lead analyses was also conducted. See attached Figures 1-5.

This survey was limited to the area in and around the restroom located off of the Reception Area, and to the walkway/driveway and front entry alcove to provide ramp access. No other areas were covered by this survey. This survey references data from a previous asbestos survey, as attached, titled *Limited Asbestos Survey & Representative Paint Sampling for Lead, Reception Ceiling, Humboldt County Coroner's Office, 3012 "I" Street, Eureka, CA.*, dated March 3, 2018. Note that these two reports use two different addresses for the same building. The Humboldt County Coroner's Office is located at the N-E corner of the Clark Complex Building. This current report uses 720 Wood Street to maintain consistency with the address used on the project architectural plans while the 3012 "I" Street address, as used for the previous report, is as listed in the phone directory.

This asbestos survey was conducted to identify any materials that contain asbestos pursuant to the requirements of the California Health & Safety Code and for compliance with Cal/OSHA regulations (8 CCR 1529) for worker protection. This report will also provide compliance with the EPA National Emission Standards for Hazardous Air Pollutants (NESHAP) regulations concerning renovation activities (40 CFR, Part 61, Subpart M). As a "public" structure 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 samples were collected during this survey and submitted for laboratory analysis of lead content.

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

As indicated on the attached plans, the existing restroom will be expanded by using the adjacent closet space and expanding slightly into the existing Reception Area. ADA ramp access will be provided by alterations to the front parking area, walkway, and the entry alcove slab. The Reception Area ceiling, as surveyed in the previous report of March 3, 2018, is finished with acoustic ceiling tiles over drywall. The subject restroom and the adjacent closet are constructed of gypsum drywall. The floors in the subject restroom, adjacent closet, and Reception Area are finished with a sheet flooring. The parking area is asphalt, the walkways and front alcove slab are concrete.

Asbestos Survey:

A total of sixteen (16) samples were collected for the analysis of asbestos content, as follows:

- 3 Joint compound/gypsum board
 - 3 Sheet flooring & dark mastics
 - 2 Concrete, gray, interior slabs
 - 5 Concrete, gray, exterior walkways curbs
 - 3 Asphalt
- 16 samples total

The samples were submitted to an accredited laboratory for the initial analysis of asbestos content by Polarized Light Microscopy (PLM). The sample Chain of Custody and Laboratory Report are attached. The sample locations are indicated on attached Figures 3 & 4, and a summary of the analytic data is included in the attached Table 1.

The drywall joint compound tested positive for asbestos under the initial PLM analyses. One composite sample of the joint compound/gypsum board was re-submitted for a more accurate determination of asbestos content by 400 Point Count analyses, as required for some agency determinations and for waste characterization. A 400 Point Count analysis was also performed on a sample of sheet flooring mastic. The Point Count analyses data are summarized below.

400 Point Count Analyses

Sample ID#	Material	Initial PLM Result (visually estimated)	400 Point Count Result
180320-1	Joint compound/gypsum board	<1% CH (joint compound)	<0.25% CH (composite)
180320-5	Flooring mastic, brown & black	<1% CH	<0.25% CH

The following definitions may be referred to in this report.

- **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.

ACCM

- **Joint compound/gypsum board drywall**
- **Flooring mastic, brown & black,**

Note: the remnant asbestos containing mastic on the concrete substrate is adhered to the sheet flooring, which is contaminated by the mastic.

Note: the drywall ceiling under acoustic tiles in the Reception Area was previously determined to be ACCM (see attached report of 3/3/18).

The locations of the ACCM are shown on attached Figure 5. See attached Table 2 for quantities, agency categorizations, abatement and disposal requirements.

PACM

Previous surveys in this facility have found asbestos containing Thermal System Insulation (TSI) on water piping located above hard ceilings and behind walls. This survey did not include accessing spaces above the ceiling and behind walls, therefore, it must be presumed that ACM (PACM) may be encountered in such places and that “soft” demolition of walls and ceilings must be performed by the asbestos abatement contractors during abatement of the ACCM drywall to avoid damage to any ACM TSI. It is recommended to have any such encountered TSI abated at that time.

Relevant Asbestos Regulations:

NESHAP: As a public building this site 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. That requirement has been met with this report.

Since Regulated Asbestos Containing Material was not found in project materials, a NESHAP Notification for abatement will not be required however; if the proposed renovations or repairs will disturb any “load bearing” members the work is considered “demolition” work. A NESHAP Notification is always required prior to any “demolition” work. If the work does involve removal of any “load bearing member,” a NESHAP Notification will need to be filed with the NCUAQMD, along with a copy of this report and a \$268 filing fee, at least ten working days prior to any “demolition” work.

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 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 renovation or demolition activities.

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

The regulatory requirements for the ACCM identified in this survey is discussed below.

ACCM Joint Compound/Drywall: The drywall joint compound found in the project areas contains asbestos. Two samples of joint compound were re-submitted for accurate determination of actual asbestos content by 400 Point Count analysis and were found to contain <1% asbestos. Therefore, the drywall is defined as ACCM. While the ACCM designation excludes this material from regulation under NESHAP, Cal/OSHA requires Class II methods for abatement/disturbance of the ACCM drywall materials by a licensed asbestos abatement contractor. *It is recommended herein to augment the standard Class II abatement with negative air containment of the abatement area.*

ACCM Flooring Mastic: The dark flooring mastic found on the concrete slab floor under sheet flooring and as a contaminant on the sheet flooring contains asbestos. The sheet flooring material itself is otherwise non-detect for asbestos. A mastic sample was re-submitted for accurate determination of actual asbestos content by 400 Point Count analysis and was found to contain <1% asbestos. Therefore, the flooring mastic is defined as ACCM. While the ACCM designation excludes this material from regulation under NESHAP, Cal/OSHA requires Class II methods for abatement/disturbance of the ACCM drywall materials by a licensed asbestos abatement contractor. *It is recommended herein to augment the standard Class II abatement with negative air containment of the abatement area.*

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

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

Paint Sampling/Analyses:

One (1) representative paint chip sample was collected from the drywall in the restroom. The sample location is shown on attached Figure 3. The sample was submitted to an accredited laboratory for the analysis of lead content. The result is summarized in the attached Table 3.

For paint chip samples, paints with a lead content at or above 5,000 parts per million (ppm) are defined as Lead Based Paint (LBP), paints with lead content that range between 100 ppm and 4,999 ppm are defined as “Lead Containing Surface Coatings” (LCSC), and analytic results of <100 ppm lead are deemed to be “undetectable” for lead, or “lead free.”

The sample was found to contain 340 ppm lead and is categorized as LCSC.

Cal/OSHA Compliance Measures:

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:

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.

Disclaimer:

The sole purpose of this investigation and of this report is to assess the site with respect to asbestos and lead paint as requested by the client. Brunelle & Clark Consulting, LLC is not responsible for locating asbestos 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, the reevaluation of the data and findings, observations, conclusions, and recommendations expressed in the report. If suspect materials that were not covered by this survey are encountered by the contractor during this project, the disturbance of such materials should cease until such materials are surveyed and/or sampled for asbestos.

Sincerely



Zindar Brunelle

Certified Asbestos Consultant, #14-5295 (Exp. 10/15/18)

Certified Lead Inspector/Assessor/Supervisor, #25819 (Exp. 09/02/18)

Attachments: Figures 1-5, Tables 1-3, Laboratory Reports, and

Limited Asbestos Survey & Representative Paint Sampling for Lead, Reception Ceiling, Humboldt County Coroner’s Office, 3012 “I” Street, Eureka, CA.

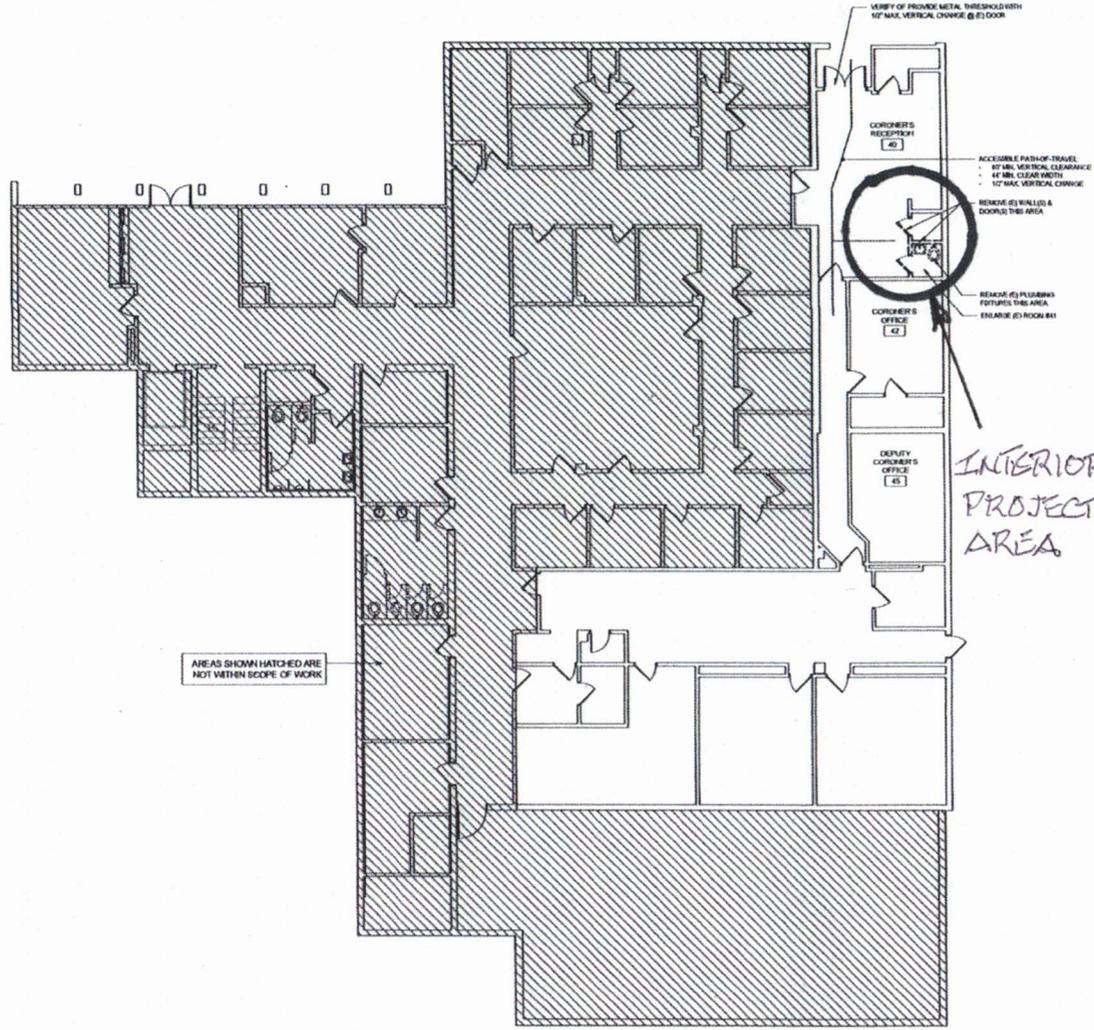
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BRUNELLE & CLARK CONSULTING, LLC

P. O. Box 1138

Arcata, California 95518

#1800320 12/26/18



AREAS SHOWN HATCHED ARE NOT WITHIN SCOPE OF WORK

INTERIOR PROJECT AREA

1 OVERALL FIRST FLOOR PLAN - EXISTING / DEMO
1/8" = 1'-0"



NO.	DESCRIPTION	DATE

CONSULTANT

BrokawDesign
 P.O. BOX 3103
 ROBERT PARK, CA 94927
 WWW.BROKAWDESIGN.COM

PROJECT
CORONER'S OFFICE ACCESSIBILITY IMPROVEMENTS
 720 WOOD STREET
 EUREKA, CA 95502

SHEET NAME
EXISTING / DEMO FLOOR PLAN

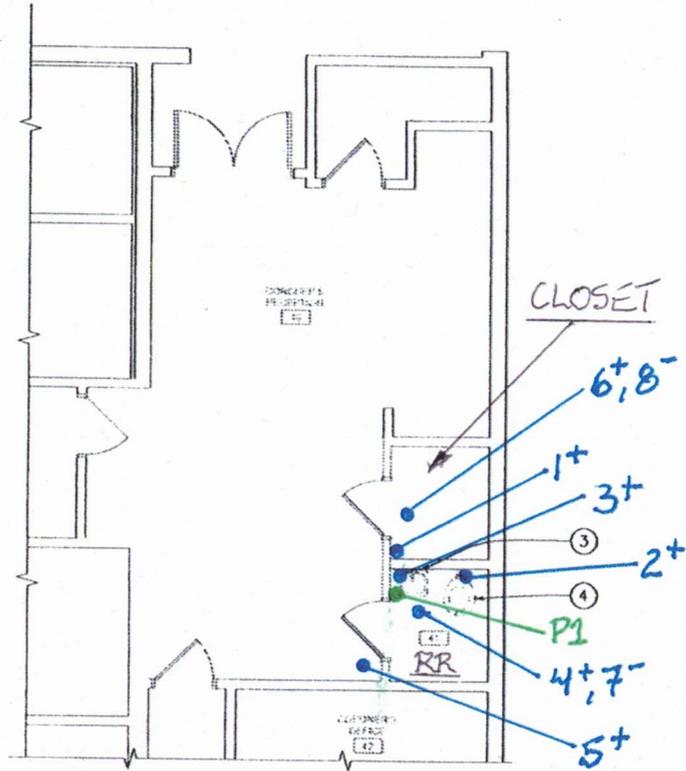
DATE	10-19-2018
PREPARED BY	AJLA REMEY
DRAWN BY	AJLA
DESIGNED BY	Designer
PROJECT	
PEER REVIEW	Checker
SHEET NUMBER	

A-101

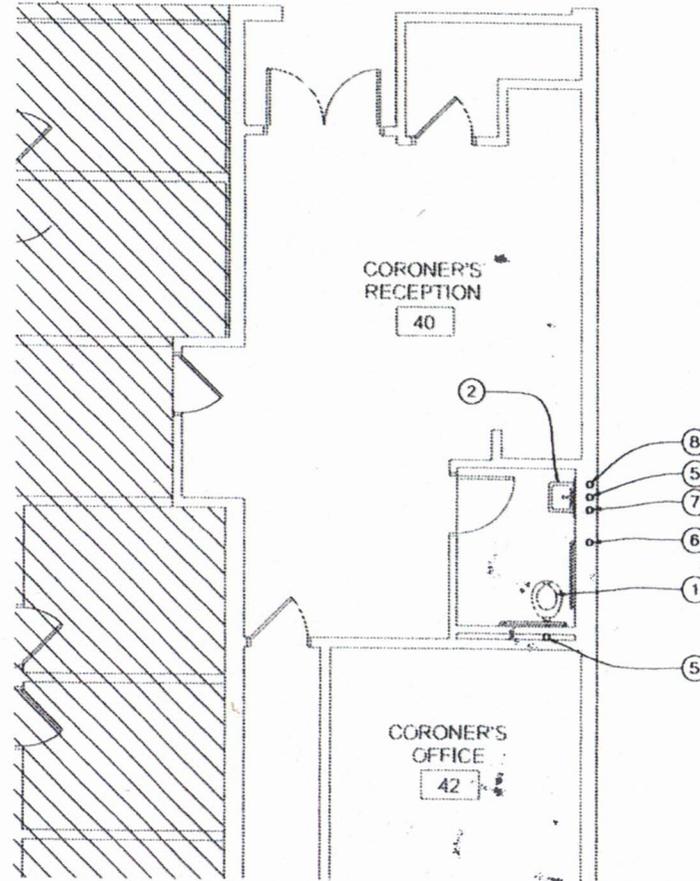
INTERIOR PROJECT AREA
HUMBOLDT COUNTY
CORONER'S OFFICE
720 WOOD STREET
EUREKA, CA

FIG. 1

#1800320 12/26/18



PARTIAL DEMO FLOOR PLAN - AREA A 1/4\"/>



PARTIAL NEW FLOOR PLAN - AREA A 1/4\"/>

LEGEND

- # Asbestos Sample Locations
(Prefixed 1800320-#, with + or - designation)
(+) is positive for Asbestos, (-) is negative
- P# Paint Chip Sample Locations
(Prefixed P-#)

- Sheet Notes**
1. INSTALL NEW WC. CONNECT 4" W., 2" V., AND 1/2" CW.
 2. INSTALL NEW LAV. CONNECT 2" W., 1 1/2" V., 1/2" HW AND 1/2" CW.
 3. DEMOLISH EXISTING LAV. CAP ALL PIPING CONCEALED BELOW FLOOR/WALL. VERIFY EXACT LOCATION.
 4. DEMOLISH EXISTING WC. CAP ALL PIPING CONCEALED BELOW FLOOR/WALL. VERIFY EXACT LOCATION.
 5. CONNECT THE NEW WASTE PIPING SYSTEM TO EXISTING WASTE PIPE. VERIFY EXACT LOCATION.
 6. COLLECT ALL VENT PIPING AND RUN VTR.
 7. VERIFY EXACT LOCATION OF 1 1/2" EXISTING COLD WATER PIPE TO CONNECT THE NEW COLD WATER PIPING.
 8. RUN NEW 1/2" HW. TO CONNECT TO NEAREST 3/4" OR LARGER HW. PIPE.

INTERIOR SAMPLE LOCATIONS
HUMBOLDT COUNTY
CORONER'S OFFICE
720 WOOD STREET
EUREKA, CA

SEAL



CONSULTANT



LEIFER ENGINEERING, INC.
 1651 Second Street
 San Rafael, CA 94901
 (415) 456-4200
 (415) 456-1248 fax

BrokawDesign
 P.O. BOX 3183
 ROBERT PARK, CA 94927
 WWW.BROKAWDESIGN.COM

PROJECT

CORONER'S OFFICE ACCESSIBILITY IMPROVEMENTS

720 WOOD STREET
 EUREKA, CA 95502

SHEET NAME

PLUMBING DEMO AND NEW FLOOR PLAN

ISSUE DATE: PREPARATION AND REVIEW

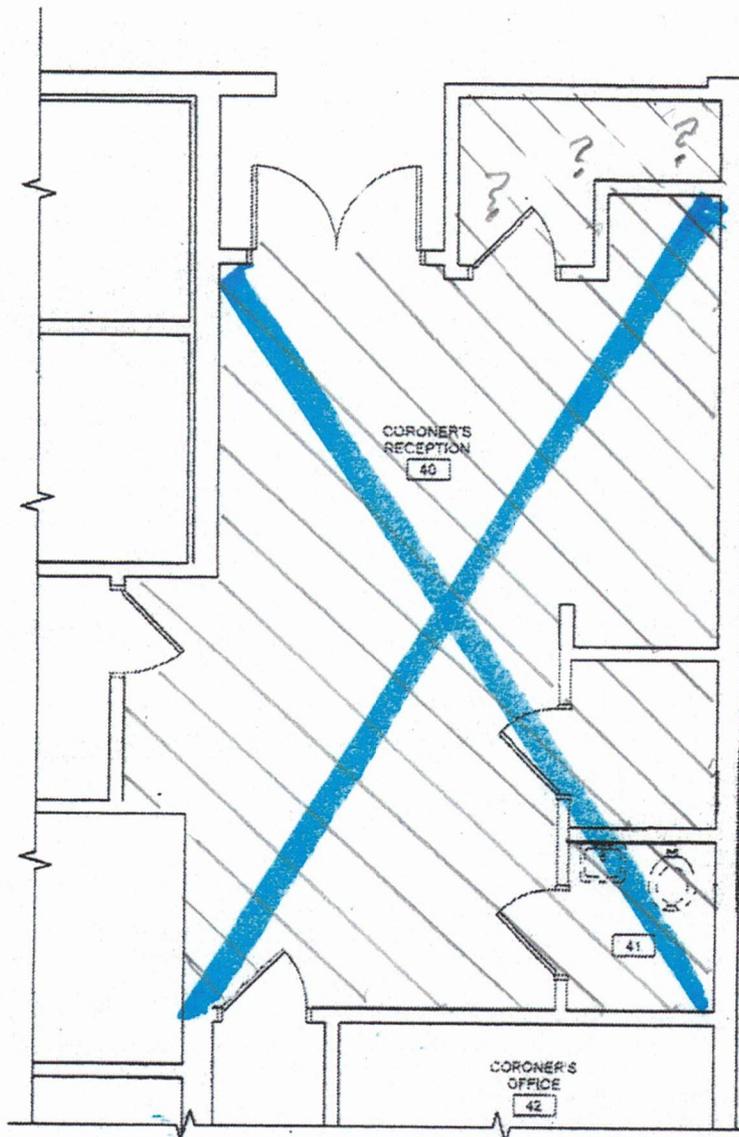
DESIGNED BY: PEER HUBBARD

PROJECT NO.:

SHEET NUMBER

P201

#1800320 12/26/18



LEGEND

-  ACCM joint compound/gypsum board drywall
-  ACCM flooring mastic, black & brown and brown only, on concrete substrate and as contaminant on sheet flooring

PACM: Possible ACM TSI on piping behind walls & ceilings, must "soft" demo to locate if present.

PROJECT ACCM LOCATIONS

**HUMBOLDT COUNTY
CORONER'S OFFICE
720 WOOD STREET
EUREKA, CA**

FIG. 5

**TABLE 1
SUMMARY OF ASBESTOS ANALYTIC DATA**

Humboldt County Coroner's Office, ADA Renovations
720 Wood Street, Eureka, CA

Sample Number	Sample Description (each layer)	Location	Asbestos % and Type	Friable vs. Non-Friable	Comments
180320-1	Joint Compound	Reception, closet, wall	<1% CH	Non-Friable	
<i>2nd layer</i>	<i>...gypsum board</i>	“”	None Detected	Non-Friable	
<i>400 Point Count</i>	<i>On composite of gypsum board/joint compound above</i>	“”	<0.25% CH	Non-Friable	By 400 Point Count Analysis
180320-2	Joint Compound	Reception, restroom, ceiling	<1% CH	Non-Friable	
<i>2nd layer</i>	<i>...gypsum board</i>	“”	None Detected	Non-Friable	
180320-3	Joint Compound	Reception, restroom, wall	<1% CH	Non-Friable	
<i>2nd layer</i>	<i>...gypsum board</i>	“”	None Detected	Non-Friable	
180320-4	Sheet flooring, tan w/speckles	Reception, restroom, floor	None Detected	Non-Friable	
<i>2nd layer</i>	<i>...mastic, brown</i>	“”	<1% CH	Non-Friable	
180320-5	Sheet flooring, tan w/speckles	Reception, floor	None Detected	Non-Friable	
<i>2nd layer</i>	<i>...mastic, brown & black</i>	“”	<1% CH	Non-Friable	
<i>400 Point Count</i>	<i>On mastic sample above</i>	“”	<0.25% CH	Non-Friable	By 400 Point Count Analysis
180320-6	Sheet flooring, tan w/speckles	Reception, closet floor	None Detected	Non-Friable	
<i>2nd layer</i>	<i>...mastic, brown & black</i>	“”	<1% CH	Non-Friable	
180320-7	Concrete, gray	Reception, restroom, slab	None Detected	Non-Friable	
180320-8	Concrete, gray	Reception, closet, slab	None Detected	Non-Friable	
180320-9	Concrete, gray	Exterior, sidewalk	None Detected	Non-Friable	
180320-10	Concrete, gray	Exterior, sidewalk, curb	None Detected	Non-Friable	
180320-11	Concrete, gray	Exterior, parking lot, curb		Non-Friable	

TABLE 1
SUMMARY OF ASBESTOS ANALYTIC DATA

Humboldt County Coroner's Office, ADA Renovations
720 Wood Street, Eureka, CA

Sample Number	Sample Description (each layer)	Location	Asbestos % and Type	Friable vs. Non-Friable	Comments
180320-12	Concrete, gray	Exterior, entry pad	None Detected	Non-Friable	
180320-13	Concrete, gray	Exterior, remnant pad	None Detected	Non-Friable	
180320-14	Asphalt, black	Exterior, parking lot	None Detected	Non-Friable	
180320-15	Asphalt, black	Exterior, parking lot	None Detected	Non-Friable	
180320-16	Asphalt, black	Exterior, parking lot	None Detected	Non-Friable	

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

TR = Tremolite AN = Anthophyllite AC = Actinolite

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

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

PACM= Presumed ACM

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

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

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

Bold Type = materials found to contain asbestos

Note: Some samples had multiple layers analyzed separately

TABLE 2
ASBESTOS IDENTIFICATIONS & CLASSIFICATIONS

Humboldt County Coroner's Office, ADA Renovations, 720 Wood Street, Eureka, CA

MATERIAL	LOCATION	QUANTITY	ASBESTOS CONTENT & TYPE	OSHA CLASSIFICATION	NESHAP CATEGORY	WASTE DISPOSAL CLASSIFICATION
Drywall/Joint Compound	All wall & ceiling drywall in the Reception, Reception Restroom & Reception Closet	Approx. 400 SF	<1% CH by initial PLM <0.25% on composite GB/JC by 400 Point Count	ACCM, Class II abatement required where disturbed	ACCM Not RACM*	Non-Friable asbestos waste or general construction debris
Flooring Mastic, Brown & Black Note: the overlaying sheet flooring is contaminated by the ACCM mastic, and must be abated and disposed of as asbestos	Under sheet flooring on the concrete slab in the Reception Restroom, Reception Closet, and adjacent Reception Room	Approx. 75 SF	<1% CH by initial PLM <0.25% by 400 Point Count	ACCM, Class II abatement required where disturbed	ACCM Not RACM*	Non-Friable asbestos waste or general construction debris

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

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

TR = Tremolite AN = Anthophyllite AC = Actinolite

ACM = Asbestos Containing Materials, containing >1% asbestos

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

PACM= Presumed ACM

RACM = Regulated ACM under NESHAP regulations

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

TBD = Abatement quantity to be determined for actual remediation work

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

TABLE 3
SUMMARY OF PAINT CHIP ANALYSES
Humboldt County Coroner's Office, ADA Renovations
720 Wood Street, Eureka, CA

SAMPLE ID	LOCATION	MATERIAL	COLOR	SUBSTRATE	LEAD CONTENT by weight %	LEAD CONTENT parts per million (ppm) or mg/kg
P1	Reception Restroom, wall	Paint	White	Drywall	0.034	340

Color = colors, noted by layers where possible, in descending order separated by slashes

Analysis by Lead in Paint USEPA Method 3050B/7000B

Parts Per Million (ppm) = Milligrams Per Kilogram (mg/kg)

Lead content at or above 5,000 parts per million (ppm), or 0.5% or greater by weight, are defined as Lead Based Paint (LBP), paints with lead content that range between 100 ppm and 4,999 ppm are defined as "Lead Containing Surface Coatings" (LCSC), and analytic results of <100 ppm lead are deemed to be "undetectable" for lead, or "lead free."



AmeriSci Los Angeles

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

PLM Bulk Asbestos Report

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

Arcata, CA 95518

Date Received 12/04/18 **AmeriSci Job #** 918121059
Date Examined 12/06/18 **P.O. #**
Page 1 of 5
RE: 1800320; Coroner's Office; 720 Wood St. Eureka, CA

Client No. / HGA	Lab No.	Asbestos Present	Total % Asbestos
180320-1 Location: JC/GB / Reception / Closet / Wall	918121059-01.1	Yes	Trace (<1 %) (by CVES) by Thu M. Nguyen on 12/06/18
Analyst Description: Beige, Homogeneous, Fibrous, Joint Compound Asbestos Types: Chrysotile <1. % Other Material: Non-fibrous 100 %			
180320-1 Location: JC/GB / Reception / Closet / Wall	918121059-01.2	No	NAD (by CVES) by Thu M. Nguyen on 12/06/18
Analyst Description: Off-White, Heterogeneous, Fibrous, Gypsum Board Asbestos Types: Other Material: Cellulose 5 %, Fibrous glass 2 %, Non-fibrous 93 %			
180320-2 Location: JC/GB / Reception / RR / Ceiling	918121059-02.1	Yes	Trace (<1 %) (by CVES) by Thu M. Nguyen on 12/06/18
Analyst Description: Beige, Homogeneous, Fibrous, Joint Compound Asbestos Types: Chrysotile <1. % Other Material: Non-fibrous 100 %			
180320-2 Location: JC/GB / Reception / RR / Ceiling	918121059-02.2	No	NAD (by CVES) by Thu M. Nguyen on 12/06/18
Analyst Description: Off-White, Heterogeneous, Fibrous, Gypsum Board Asbestos Types: Other Material: Cellulose 5 %, Fibrous glass Trace, Non-fibrous 95 %			
180320-3 Location: JC/GB / Reception / RR / Wall	918121059-03.1	Yes	Trace (<1 %) (by CVES) by Thu M. Nguyen on 12/06/18
Analyst Description: Beige, Homogeneous, Fibrous, Joint Compound Asbestos Types: Chrysotile <1. % Other Material: Non-fibrous 100 %			

Client Name: Brunelle & Clark Consulting, LLC

PLM Bulk Asbestos Report

1800320; Coroner's Office; 720 Wood St. Eureka, CA

Client No. / HGA	Lab No.	Asbestos Present	Total % Asbestos
180320-3 2	918121059-03.2 Location: JC/GB / Reception / RR / Wall	No	NAD (by CVES) by Thu M. Nguyen on 12/06/18
Analyst Description: Off-White, Heterogeneous, Fibrous, Gypsum Board Asbestos Types: Other Material: Cellulose 5 %, Fibrous glass Trace, Non-fibrous 95 %			
180320-4 2	918121059-04L1 Location: SF, Tan w/ Speckles / Brown Mastic / Reception / RR / Floor	No	NAD (by CVES) by Thu M. Nguyen on 12/06/18
Analyst Description: Tan, Homogeneous, Non-Fibrous, Sheet Flooring Asbestos Types: Other Material: Non-fibrous 100 %			
180320-4 2	918121059-04L2 Location: SF, Tan w/ Speckles / Brown Mastic / Reception / RR / Floor	Yes	Trace (<1 %) (by CVES) by Thu M. Nguyen on 12/06/18
Analyst Description: Tan/Black, Heterogeneous, Fibrous, Mastic Asbestos Types: Chrysotile <1. % Other Material: Non-fibrous 100 %			
180320-5 3	918121059-05L1 Location: SF, Tan w/ Speckles / Brown & Black Mastic / Reception / RR / Floor	No	NAD (by CVES) by Thu M. Nguyen on 12/06/18
Analyst Description: Tan, Homogeneous, Non-Fibrous, Sheet Flooring Asbestos Types: Other Material: Non-fibrous 100 %			
180320-5 3	918121059-05L2 Location: SF, Tan w/ Speckles / Brown & Black Mastic / Reception / RR / Floor	Yes	Trace (<1 %) (by CVES) by Thu M. Nguyen on 12/06/18
Analyst Description: Tan/Black, Heterogeneous, Fibrous, Mastic Asbestos Types: Chrysotile <1. % Other Material: Non-fibrous 100 %			
180320-6 3	918121059-06L1 Location: SF, Tan w/ Speckles / Brown & Black Mastic / Reception / RR / Closet	No	NAD (by CVES) by Thu M. Nguyen on 12/06/18
Analyst Description: Tan, Homogeneous, Non-Fibrous, Sheet Flooring Asbestos Types: Other Material: Non-fibrous 100 %			

Client Name: Brunelle & Clark Consulting, LLC

PLM Bulk Asbestos Report

1800320; Coroner's Office; 720 Wood St. Eureka, CA

Client No. / HGA	Lab No.	Asbestos Present	Total % Asbestos
180320-6 3	918121059-06L2 Location: SF, Tan w/ Speckles / Brown & Black Mastic / Reception / RR / Closet	Yes	Trace (<1 %) (by CVES) by Thu M. Nguyen on 12/06/18
Analyst Description: Tan/Black, Heterogeneous, Fibrous, Mastic Asbestos Types: Chrysotile <1. % Other Material: Non-fibrous 100 %			
180320-7	918121059-07 Location: Concrete, Gray / Reception / RR / Slab Foundation	No	NAD (by CVES) by Thu M. Nguyen on 12/06/18
Analyst Description: Grey, Heterogeneous, Non-Fibrous, Cementitious, Concrete Asbestos Types: Other Material: Non-fibrous 100 %			
180320-8	918121059-08 Location: Concrete, Gray / Reception / Closet / Slab Foundation	No	NAD (by CVES) by Thu M. Nguyen on 12/06/18
Analyst Description: Grey, Heterogeneous, Non-Fibrous, Cementitious, Concrete Asbestos Types: Other Material: Non-fibrous 100 %			
180320-9	918121059-09 Location: Concrete, Gray / Ext / Sidewalk	No	NAD (by CVES) by Thu M. Nguyen on 12/06/18
Analyst Description: Grey, Heterogeneous, Non-Fibrous, Cementitious, Concrete Asbestos Types: Other Material: Non-fibrous 100 %			
180320-10	918121059-10 Location: Concrete, Gray / Ext / Sidewalk Curb	No	NAD (by CVES) by Thu M. Nguyen on 12/06/18
Analyst Description: Grey, Heterogeneous, Non-Fibrous, Cementitious, Concrete Asbestos Types: Other Material: Non-fibrous 100 %			
180320-11	918121059-11 Location: Concrete, Gray / Ext / Parking Lot Curb	No	NAD (by CVES) by Thu M. Nguyen on 12/06/18
Analyst Description: Grey, Heterogeneous, Non-Fibrous, Cementitious, Bulk Material Asbestos Types: Other Material: Non-fibrous 100 %			

PLM Bulk Asbestos Report

1800320; Coroner's Office; 720 Wood St. Eureka, CA

Client No. / HGA	Lab No.	Asbestos Present	Total % Asbestos
180320-12 Location: Concrete, Gray / Ext / Entry Pad	918121059-12	No	NAD (by CVES) by Thu M. Nguyen on 12/06/18
Analyst Description: Grey, Heterogeneous, Non-Fibrous, Cementitious, Concrete Asbestos Types: Other Material: Non-fibrous 100 %			
180320-13 Location: Concrete, Gray / Ext / Remnat Pad	918121059-13	No	NAD (by CVES) by Thu M. Nguyen on 12/06/18
Analyst Description: Grey, Heterogeneous, Non-Fibrous, Cementitious, Concrete Asbestos Types: Other Material: Non-fibrous 100 %			
180320-14 Location: Asphalt Black / Ext / Parking Lot	918121059-14	No	NAD (by CVES) by Thu M. Nguyen on 12/06/18
Analyst Description: Black, Heterogeneous, Non-Fibrous, Asphalt Asbestos Types: Other Material: Non-fibrous 100 %			
180320-15 Location: Asphalt Black / Ext / Parking Lot	918121059-15	No	NAD (by CVES) by Thu M. Nguyen on 12/06/18
Analyst Description: Black, Heterogeneous, Non-Fibrous, Asphalt Asbestos Types: Other Material: Non-fibrous 100 %			
180320-16 Location: Asphalt Black / Ext / Parking Lot	918121059-16	No	NAD (by CVES) by Thu M. Nguyen on 12/06/18
Analyst Description: Black, Heterogeneous, Non-Fibrous, Asphalt Asbestos Types: Other Material: Non-fibrous 100 %			

Client Name: Brunelle & Clark Consulting, LLC

PLM Bulk Asbestos Report

1800320; Coroner's Office; 720 Wood St. Eureka, CA

Reporting Notes:

Analyzed By: Thu M. Nguyen *Thu M. Nguyen*; Date Analyzed: 12/6/2018 *12-6-18*

*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); Note: PLM is not consistently reliable in detecting asbestos in floor coverings and similar NOB materials. TEM is currently the only method that can be used to determine if this material can be considered or treated as non-asbestos-containing in New York State (also see EPA Advisory for floor tile, FR 59, 146, 38970, 8/1/94). NIST Accreditation requirements mandate that this report must not be reproduced except in full with the approval of the laboratory. This PLM report relates ONLY to the items tested.

Reviewed By: *at aed*



AmeriSci Los Angeles

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

PLM Bulk Asbestos Report

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

Arcata, CA 95518

Date Received 12/10/18 **AmeriSci Job #** 918121189
Date Examined 12/12/18 **P.O. #**
Page 1 of 1
RE: 1800320; Coroner's Office; 720 Wood St. Eureka, CA

Client No. / HGA	Lab No.	Asbestos Present	Total % Asbestos
180320-1 Location: JC/GB / Reception / Closet / Wall	918121189-01	Yes	Trace (<0.25 % pc) ¹ (by 400 pt ct) by Paola Ducoing on 12/12/18
Analyst Description: Beige, Homogeneous, Fibrous, Composite Asbestos Types: Chrysotile <0.25 % pc Other Material: Non-Asbestos/Inert 15.7 % Comment: Heat Sensitive (organic): 11.7%; Acid Soluble (inorganic): 72.6%; Inert (Non-asbestos): 15.7%			
180320-5 3 Location: SF, Tan w/ Speckles / Brown & Black Mastic / Reception / RR / Floor	918121189-02	Yes	Trace (<0.25 % pc) ¹ (by 400 pt ct) by Paola Ducoing on 12/12/18
Analyst Description: Tan/Black, Heterogeneous, Fibrous, Mastic Asbestos Types: Chrysotile <0.25 % pc Other Material: Non-Asbestos/Inert 5.6 % Comment: Heat Sensitive (organic): 53.5%; Acid Soluble (inorganic): 40.9%; Inert (Non-asbestos): 5.6%			

Reporting Notes:

(1) EPA 400 Point Count Analysis performed on Inert Residue remaining after 480C heat and HCl acid treatments
Analyzed By: Paola Ducoing *Paola Ducoing*; Date Analyzed: 12/12/2018 *12/12/18*
*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); Note: PLM is not consistently reliable in detecting asbestos in floor coverings and similar NOB materials. TEM is currently the only method that can be used to determine if this material can be considered or treated as non-asbestos-containing in New York State (also see EPA Advisory for floor tile, FR 59, 146, 38970, 8/1/94). NIST Accreditation requirements mandate that this report must not be reproduced except in full with the approval of the laboratory. This PLM report relates ONLY to the items tested.

Reviewed By: *Paola Ducoing*

Analysis: <input checked="" type="checkbox"/> Standard PLM <input type="checkbox"/> 400 Point Count <input type="checkbox"/> 1,000 Point Count Turnaround Time: Rush/1-day/2-days/ <u>3-days</u> /5-days	BRUNELLE & CLARK CONSULTING, LLC P.O. Box 1138 Arcata, CA 95518 Ph: (707) 822-4058 Cell #: (707) 672-5345 zbconsult@outlook.com	Date: 11/30/18 Site: Coroner's Office 720 Wood St. Eureka, CA Proj. # 1800320
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BULK ASBESTOS SAMPLING

9/18/12/059

Sample No.	Sample Description	Hom. Area	Location	Mat'l Type	Friability
180320-1	JC/GB	1	Reception/closet/wall	MM	NF
-2	↓	1	RR/ceiling	↓	↓
-3	↓	1	↓/↓/↓ wall	↓	↓
-4	SF, tan w- speckles / Brown Mastic	2	↓/↓/↓ floor	↓	F
-5	SF, tan w- speckles / Brown & Black Mastic	3	↓ floor	↓	↓
-6	↓ ↓ ↓	3	↓ closet	↓	↓
-7	Concrete, gray	4	RR / slab foundation	↓	NF
-8	↓	4	↓ closet ↓	↓	↓
-9	Concrete, gray	5	Ext./sidewalk	MM	NF
-10	↓	6	↓ sidewalk curb	↓	↓
-11	↓	7	↓ Parking lot curb	↓	↓
-12	↓	8	↓ Entry pad	↓	↓
-13	↓	9	↓ Remnant pad	↓	↓
-14	Asphalt, black	10	↓ Parking Lot	↓	↓
↓-15	↓	10	↓ ↓ ↓	↓	↓

Sample Abbreviations

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

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

Material Type

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

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

Sampled by: Ziadar Brunelle Relinquished by: Ziadar Brunelle Date/Time: 12/13/18	Received by: [Signature] Signature: Date/Time:
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AmeriSci Los Angeles

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

AmeriSci Job #: 418121035

Lead Analysis Results

Date Received: 12/04/18

Date Analyzed: 12/06/18

Paint

EPA Method 3050B/7000B

Brunelle & Clark Consulting, LLC

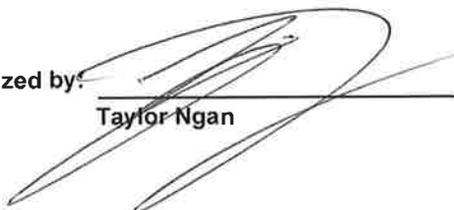
Arcata, CA

Job Site: 1800320; Coroner's Office; 720 Wood St. Eureka CA

AmeriSci #	Client Number	Sample Location	% Lead (w/w)	Lead Content (mg/kg = ppm)
418121035	P1	Reception RR, Wall / White	0.034	340

AmeriSci Reporting Limit is 0.01%, or 100mg/kg prior to any dilutions due to high analyte concentrations or matrix interferences. AmeriSci does not correct sample results by the blank value. All analytical batch data met quality control criteria unless otherwise noted.

Reviewed by: 

Analyzed by: 
Taylor Ngan

Brunelle & Clark Consulting, LLC

March 3, 2018

1800310

To: Humboldt County
Dept. of Public Works
Attn: Mr. Jake Johnson
1106 Second Street
Eureka, CA 95501

Re: Limited Asbestos Survey & Representative Paint Sampling For Lead, Reception Ceiling, Humboldt County Coroner's Office, 3012 'I' Street, Eureka, CA.

Dear Mr. Johnson:

On February 8, 2018, this office conducted a limited asbestos sampling survey of materials to be disturbed by repair of water damaged ceiling materials in the reception area of the Humboldt county Coroner's Office, at the above referenced address. Representative paint sampling for lead was also conducted. See attached Figures 1 & 2.

This survey was limited to the water damaged section of ceiling only, and does not include any other materials, in any other spaces on the interior or exterior of the building.

This asbestos survey was conducted to identify any materials that contain asbestos pursuant to the requirements of the California Health & Safety Code and for compliance with Cal/OSHA regulations (8 CCR 1529) for worker protection. This report will also provide compliance with the EPA National Emission Standards for Hazardous Air Pollutants (NESHAP) regulations concerning renovation activities (40 CFR, Part 61, Subpart M). As a "commercial" structure 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 samples were collected during this survey and submitted for laboratory analysis of lead content.

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.

The Humboldt County Coroner's Office is located at the N-E corner of the Clark Complex Building. The Reception area ceiling is finished with acoustic ceiling tiles over drywall.

Asbestos Survey:

A total of eight (8) samples were collected for the analysis of asbestos content, as follows:

- 2 Ceiling Tile (two types)
- 3 Ceiling Tile Mastic (two types)
- 3 Joint compound/gypsum board

The samples were submitted to an accredited laboratory for the initial analysis of asbestos content by Polarized Light Microscopy (PLM). The sample Chain of Custody and Laboratory Report are attached. The sample locations are indicated on attached Figure 1, and a summary of the analytic data is included in the attached Table 2.

The drywall joint compound tested positive for asbestos under the initial PLM analyses. One composite sample of the joint compound/gypsum board was re-submitted for a more accurate determination of asbestos content by 400 Point Count analyses, as required for some agency determinations and for waste characterization. The Point Count analysis data is summarized below.

400 Point Count Analyses

Sample ID#	Material	Initial PLM Result (visually estimated)	400 Point Count Result
18310- 6	Joint compound/gypsum board	<1% CH (joint compound)	<0.25% CH (composite)

The following definitions may be referred to in this report.

- ***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.***

The drywall joint compound material was found to contain <1% asbestos by the 400 Point Count analysis above and is categorized as ACCM, as listed below:

ACCM

- Joint compound/gypsum board drywall (above ceiling tile)

The location of the ACCM is shown on attached Figure 2. See attached Table 1, for quantities, agency categorizations, abatement and disposal requirements.

EPA NESHAP: As a commercial building this site 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. That requirement has been met with this report.

Since Regulated Asbestos Containing Material was not found in project materials, a NESHAP Notification for abatement does not need be filed (see ACCM Joint Compound/Drywall below for further discussion of regulatory requirements for abatement).

Cal/OSHA: 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 renovation or demolition activities.

The regulatory requirements for the ACCM Joint Compound/Drywall identified in this survey is discussed below.

ACCM Joint Compound/Drywall: The drywall joint compound found above the ceiling tile in the reception area contains asbestos. One sample of joint compound was re-submitted for accurate determinations of actual asbestos content by 400 Point Count analyses, and was found to contain <1% asbestos. Therefore, the drywall is defined as ACCM. While the ACCM designation excludes this material from regulation under NESHAP, Cal/OSHA requires Class II methods for abatement/disturbance of the ACCM drywall materials by a licensed asbestos abatement contractor. *It is recommended herein to augment the standard Class II abatement with negative air containment of the abatement area.*

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

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

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

Paint Sampling/Analyses:

One (1) representative paint chip sample was collected from the drywall ceiling above the ceiling tile. The sample was submitted to an accredited laboratory for the analysis of lead content. The results are summarized in the attached Table 3.

For paint chip samples, paints with a lead content at or above 5,000 parts per million (ppm) are defined as Lead Based Paint (LBP), paints with lead content that range between 100 ppm and

4,999 ppm are defined as “Lead Containing Surface Coatings” (LCSC), and analytic results of <100 ppm lead are deemed to be “undetectable” for lead, or “lead free.”

The sample was found to contain 300 ppm lead and is categorized as LCSC.

Cal/OSHA Compliance Measures:

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:

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.

Disclaimer:

The sole purpose of this investigation and of this report is to assess the site with respect to asbestos and paint as requested by the client. Brunelle & Clark Consulting, LLC is not responsible for locating asbestos 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, the reevaluation of the data and findings, observations, conclusions, and recommendations expressed in the report. If suspect materials that were not covered by this survey are encountered by the contractor during this project, the disturbance of such materials should cease until such materials are surveyed and/or sampled for asbestos.

Should you have any questions, please contact this office.

Sincerely



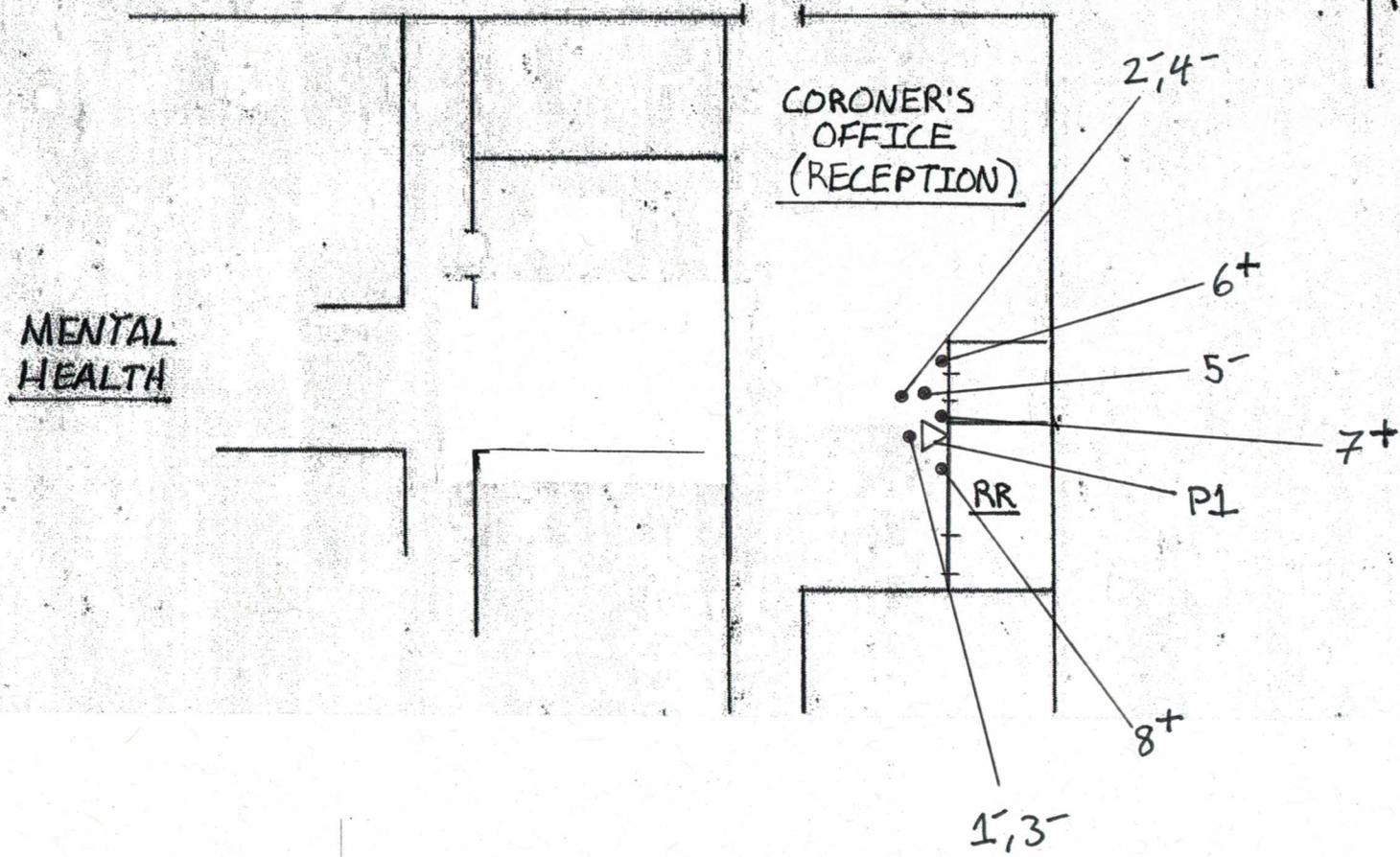
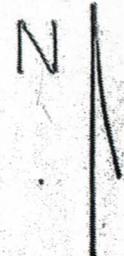
Zindar Brunelle

Certified Asbestos Consultant, #14-5295 (Exp. 10/15/18)

Certified Lead Inspector/Assessor/Supervisor, #25819 (Exp. 09/02/18)

Attachments: Figures 1 & 2, Tables 1-3, Laboratory Reports

Ph: (707) 822-4058 Cell: (707) 672-5345
P.O. Box 1138, Arcata, CA 95518
zbconsult@outlook.com



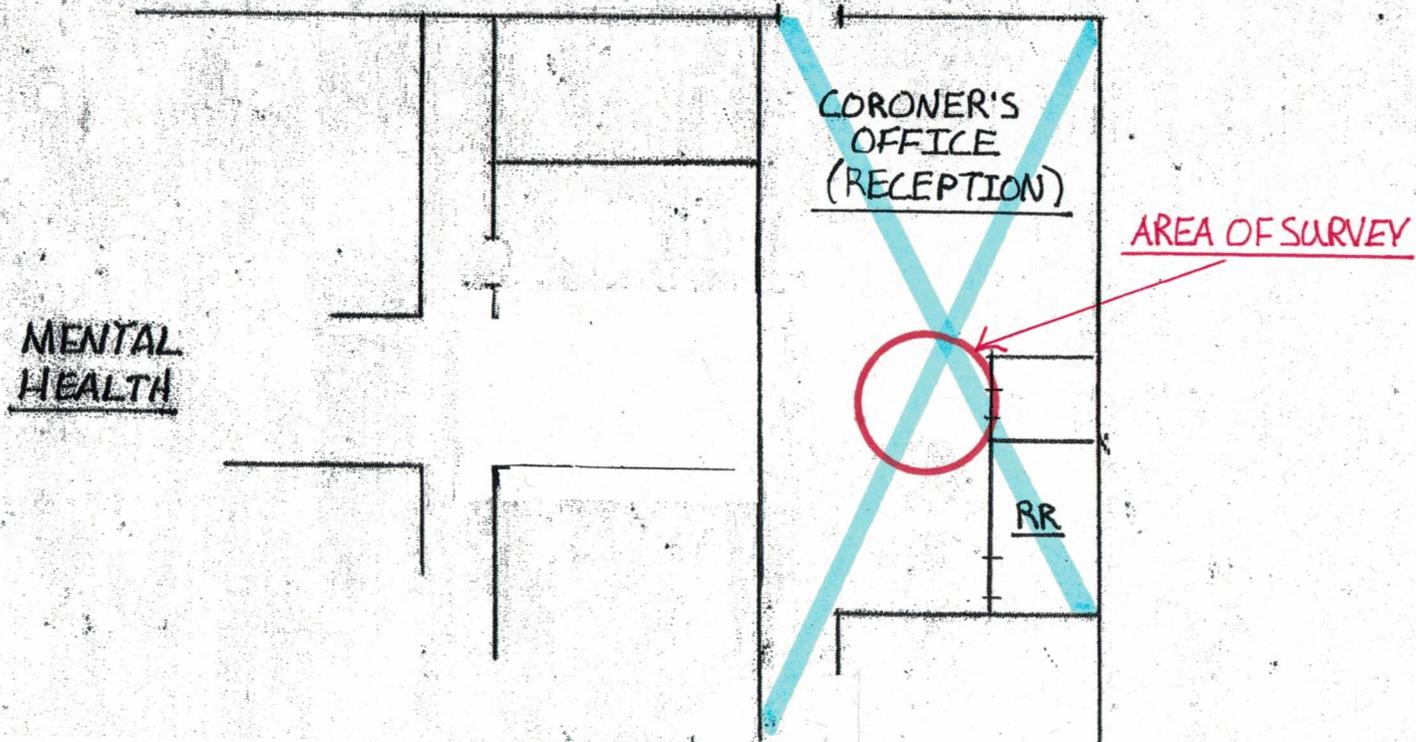
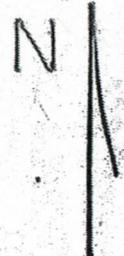
LEGEND

● # Asbestos Sample Locations
(Prefixed 18310- #, with + or - designation)
(+) is positive for Asbestos, (-) is negative

◁ P# Paint Samples

Humboldt County Coroner's Office
3012 "I" street
Eureka, CA

FIG. 1



LEGEND

 ACCM drywall/joint compound.

Humboldt County Coroner's Office
3012 "T" street
Eureka, CA

FIG. 2

TABLE 1
ASBESTOS IDENTIFICATIONS & CLASSIFICATIONS

Reception Ceiling
Humboldt County Coroner's Office
3012 "P" Street, Eureka, CA

MATERIAL	LOCATION	QUANTITY	ASBESTOS CONTENT & TYPE	OSHA CLASSIFICATION	NESHAP CATEGORY	WASTE DISPOSAL CLASSIFICATION
Drywall/Joint Compound	Reception, ceiling above ceiling tiles	TBD	<1% CH by initial PLM. <0.25% on composite GB/JC by 400 Point Count.	ACCM, Class II abatement required where disturbed	ACCM Not RACM*	Non-Friable asbestos waste or general construction debris

SF = Square Feet

CH = Chrysotile asbestos

ACM = Asbestos Containing Materials, containing >1% asbestos

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

PACM= Presumed ACM

RACM = Regulated ACM under NESHAP regulations

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

TBD = Abatement quantity to be determined for actual remediation work

**TABLE 2
SUMMARY OF ANALYTIC DATA**

**Reception Ceiling
Humboldt County Coroner's Office
3012 "T" 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
18310- 1	Ceiling Tile (1x1), fissures & pinholes (type 1)	Reception, ceiling	None Detected	Non-Friable	
18310- 2	Ceiling Tile (1x1), fissures & pinholes (type 2)	Reception, ceiling	None Detected	Non-Friable	
18310- 3	Ceiling Tile Mastic, tan	Reception, ceiling	None Detected	Non-Friable	
18310- 4	Ceiling Tile Mastic, dark brown	Reception, ceiling	None Detected	Non-Friable	
18310- 5	Ceiling Tile Mastic, dark brown	Reception, ceiling	None Detected	Non-Friable	
18310- 6	Joint Compound	Reception, ceiling	<1% CH	Non-Friable	
<i>2nd layer</i>	<i>...gypsum board</i>	<i>""</i>	None Detected	Non-Friable	See joint compound above
<i>400 Point Count</i>	<i>On composite joint compound/gypsum board sample above</i>	<i>""</i>	<i><0.25% CH</i>	<i>Non-Friable</i>	<i>By 400 Point Count analysis</i>
18310- 7	Joint Compound	Reception, ceiling	<1% CH	Non-Friable	
<i>2nd layer</i>	<i>...gypsum board</i>	<i>""</i>	None Detected	Non-Friable	See joint compound above
18310- 8	Joint Compound	Reception, ceiling	<1% CH	Non-Friable	
<i>2nd layer</i>	<i>...gypsum board</i>	<i>""</i>	None Detected	Non-Friable	See joint compound above

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.

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

PACM= Presumed ACM.

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

**TABLE 3
PAINT ANALYSES**

**Reception Ceiling
Humboldt County Coroner's Office
3012 "T" Street, Eureka, CA**

SAMPLE ID	LOCATION	MATERIAL	COLOR*	SUBSTRATE	LEAD CONTENT by weight %	LEAD CONTENT parts per million (ppm) or mg/kg
18310- P1	Reception, ceiling above ceiling tile	Paint	Tan	Drywall	0.030	300

Color* = Colors noted by layers where possible, in descending order separated by slashes.

Analysis by Lead in Paint USEPA Method 3050B/7000B

Parts per million (ppm) = milligrams per kilogram (mg/kg)

Lead content at 5,000 ppm (or 0.5% by wt.) or greater is defined as "Lead Based Paint", materials with lesser amounts of detectable lead over 600 ppm are described as "Lead Containing Surface Coatings" (LCSC).



AmeriSci Los Angeles

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

PLM Bulk Asbestos Report

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

Arcata, CA 95518

Date Received 02/09/18 **AmeriSci Job #** 918021276
Date Examined 02/10/18 **P.O. #**
Page 1 of 3
RE: 1800310; 3012 "I" St. Eureka CA

Client No. / HGA	Lab No.	Asbestos Present	Total % Asbestos
18310-1 Location: CT (1x1) (Type 1) Fissures & Pinholes / Reception / Ceiling Analyst Description: White/Grey, Homogeneous, Fibrous, Ceiling Tile Asbestos Types: Other Material: Cellulose 55 %, Fibrous glass 15 %, Non-fibrous 30 %	918021276-01	No	NAD (by CVES) by Paola Ducoing on 02/10/18
18310-2 Location: CT (1x1) (Type 2) Fissures & Pinholes / Reception / Ceiling Analyst Description: White/Grey, Homogeneous, Fibrous, Ceiling Tile Asbestos Types: Other Material: Cellulose 55 %, Fibrous glass 15 %, Non-fibrous 30 %	918021276-02	No	NAD (by CVES) by Paola Ducoing on 02/10/18
18310-3 Location: CT Mastic, Tan / Reception / Ceiling Analyst Description: Cream, Homogeneous, Non-Fibrous, Mastic Asbestos Types: Other Material: Non-fibrous 100 %	918021276-03	No	NAD (by CVES) by Paola Ducoing on 02/10/18
18310-4 Location: Dark Brown CT Mastic / Type 2 CT (1x1) / Reception / Ceiling Analyst Description: Dark Brown, Homogeneous, Non-Fibrous, Mastic Asbestos Types: Other Material: Non-fibrous 100 %	918021276-04	No	NAD (by CVES) by Paola Ducoing on 02/10/18
18310-5 Location: CT Mastic, Dark Brown / Reception / Ceiling Analyst Description: Dark Brown, Homogeneous, Non-Fibrous, Mastic Asbestos Types: Other Material: Non-fibrous 100 %	918021276-05	No	NAD (by CVES) by Paola Ducoing on 02/10/18

PLM Bulk Asbestos Report

1800310; 3012 "I" St. Eureka CA

Client No. / HGA	Lab No.	Asbestos Present	Total % Asbestos
18310-6 Location: JC/GB / Reception / Ceiling	918021276-06.1	Yes	Trace (<1 %) (by CVES) by Paola Ducoing on 02/10/18
Analyst Description: Beige, Homogeneous, Non-Fibrous, Joint Compound			
Asbestos Types: Chrysotile <1. %			
Other Material: Non-fibrous 100 %			
18310-6 Location: JC/GB / Reception / Ceiling	918021276-06.2	No	NAD (by CVES) by Paola Ducoing on 02/10/18
Analyst Description: White/Brown, Homogeneous, Fibrous, Gypsum Board			
Asbestos Types:			
Other Material: Cellulose 15 %, Non-fibrous 85 %			
18310-7 Location: JC/GB / Reception / Ceiling	918021276-07.1	Yes	Trace (<1 %) (by CVES) by Paola Ducoing on 02/10/18
Analyst Description: Beige, Homogeneous, Non-Fibrous, Joint Compound			
Asbestos Types: Chrysotile <1. %			
Other Material: Non-fibrous 100 %			
18310-7 Location: JC/GB / Reception / Ceiling	918021276-07.2	No	NAD (by CVES) by Paola Ducoing on 02/10/18
Analyst Description: White/Brown, Homogeneous, Fibrous, Gypsum Board			
Asbestos Types:			
Other Material: Cellulose 15 %, Non-fibrous 85 %			
18310-8 Location: JC/GB / Reception / Ceiling	918021276-08.1	Yes	Trace (<1 %) (by CVES) by Paola Ducoing on 02/10/18
Analyst Description: Beige, Homogeneous, Non-Fibrous, Joint Compound			
Asbestos Types: Chrysotile <1. %			
Other Material: Non-fibrous 100 %			
18310-8 Location: JC/GB / Reception / Ceiling	918021276-08.2	No	NAD (by CVES) by Paola Ducoing on 02/10/18
Analyst Description: White/Brown, Heterogeneous, Fibrous, Gypsum Board			
Asbestos Types:			
Other Material: Cellulose 15 %, Non-fibrous 85 %			

Client Name: Brunelle & Clark Consulting, LLC

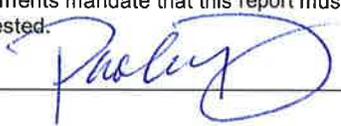
PLM Bulk Asbestos Report

1800310; 3012 "I" St. Eureka CA

Reporting Notes:

Analyzed By: Paola Ducoing ; Date Analyzed: 2/10/2018 2/10/18

*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 NOB materials. TEM is currently the only method that can be used to determine if this material can be considered or treated as non-asbestos-containing in New York State (also see EPA Advisory for floor tile, FR 59, 146, 38970, 8/1/94). NIST Accreditation requirements mandate that this report must not be reproduced except in full with the approval of the laboratory. This PLM report relates ONLY to the items tested.

Reviewed By: 



AmeriSci Los Angeles

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PLM Bulk Asbestos Report

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

Arcata, CA 95518

Date Received 02/13/18 **AmeriSci Job #** 918021332
Date Examined 02/14/18 **P.O. #**
Page 1 of 1
RE: 1800310; 3012 "I" St. Eureka CA

Client No. / HGA	Lab No.	Asbestos Present	Total % Asbestos
18310-6 Location: JC/GB / Reception / Ceiling	918021332-01	Yes	Trace (<0.25 % pc) ¹ (by 400 pt ct) by Lateef MacIntosh on 02/14/18

Analyst Description: White/Beige, Homogeneous, Non-Fibrous, Composite

Asbestos Types: Chrysotile <0.25 % pc

Other Material: Non-Asbestos/Inert 23.3 %

Comment: Heat Sensitive (organic): 16.1%; Acid Soluble (inorganic): 60.6%; Inert (Non-asbestos): 23.3%

Reporting Notes:

(1) "PLM analysis by EPA 400 Point Count Method, where Trace means less than 1% by weight (e.g. Trace < 1.0%)"

Analyzed By: Lateef MacIntosh ; Date Analyzed: 2/14/2018 2/14/18

*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 NOB materials. TEM is currently the only method that can be used to determine if this material can be considered or treated as non-asbestos-containing in New York State (also see EPA Advisory for floor tile, FR 59, 146, 38970, 8/1/94). NIST Accreditation requirements mandate that this report must not be reproduced except in full with the approval of the laboratory. This PLM report relates ONLY to the items tested.

Reviewed By:

Analysis: <input checked="" type="checkbox"/> Standard PLM <input type="checkbox"/> 400 Point Count <input type="checkbox"/> 1,000 Point Count Turnaround Time: Rush/1-day/2-days/3-days/5-days	BRUNELLE & CLARK CONSULTING, LLC P.O. Box 1138 Arcata, CA 95518 Ph: (707) 822-4058 Cell #: (707) 672-5345 zbconsult@outlook.com	Date: 2/8/18 Site: 3012 "I" St. Eureka, CA Proj.# 1800310
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BULK ASBESTOS SAMPLING

918021274

Sample No.	Sample Description	Hom. Area	Location	Mat'l Type	Mat'l Cond.	Friable
18310-1	CT(IXI), fissures & pinholes ^(Type 1)	1	Reception / ceiling	MM	ND	F
-2	CT(IXI), fissures & pinholes ^(Type 2)	2	 	 	 	↓
-3	CT mastic, tan	3				NF
-4	Dark Brown CT mastic / CT(IXI) ^(Type 2)	4/2				NF/E
-5	CT mastic, dark Brown	4				NF
-6	JC/GB	5				
-7	↓	5				
-8	↓	5				↓
						↓

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

Sampled by: Zindar Brunelle	Received by:
Relinquished by:	Date/time: 10/13/18
Date/Time: 2/8/18	Date/Time: 10/13/18



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AmeriSci Job #: 418021110

Lead Analysis Results

Date Received: 02/09/18

Date Analyzed: 02/12/18

Paint

EPA Method 3050B/7000B

Brunelle & Clark Consulting, LLC

Arcata, CA

Job Site: 1800310; 3012 "I" St. Eureka CA

AmeriSci #	Client Number	Sample Location	% Lead (w/w)	Lead Content (mg/kg = ppm)
418021110	18310-P1	Reception / Ceiling / Above Ceiling Tile / Tan	0.030	300

AmeriSci Reporting Limit is 0.01%, or 100mg/kg prior to any dilutions due to high analyte concentrations or matrix interferences. AmeriSci does not correct sample results by the blank value. All analytical batch data met quality control criteria unless otherwise noted. CA ELAP No. 2322.

Reviewed by: _____

Analyzed by: 
Soheir Galess, Chemist [mp]



CHAIN OF CUSTODY RECORD

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AMERISCI JOB NO: 418024110

PAGE 4 OF 1

DUE DATE:

TEMP UPON RECEIPT:

1 DAY 2 DAY 3 DAY 5 DAY 7 DAY 10 DAY

DATA PACKAGE:

P.O.#

COMPANY: BRUNELLE & CLARK CONSULTING, LLC

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

PHONE: (707) 822-4058

Fax 1: (707) 630-5033

Cell: (707) 672-5345

CLIENT CONTACT: Zindar Brunelle

EMAIL: zbconsult@outlook.cbm

PROJECT NAME: 3012 "I" St. Eureka, CA

PROJECT NUMBER: 1800310

PROJECT STATE: CA

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

CONTAINER: P-PLASTIC G-GLASS V-VOA

Table with columns: LAB ID, CLIENT SAMPLE IDENTIFICATION, MATRIX, CONTAINER (SIZE, TYPE, #), SAMPLING INFORMATION (DATE, TIME, TECH), GRAB (G) OR COMPOSITE (C), PRESERVATIVES, SAMPLE PH AT LOGIN, Notes.

SAMPLED BY: (PRINT) Zindar Brunelle

(SIGN) Zindar Brunelle

RELINQUISHED BY: (PRINT) Zindar Brunelle

(SIGN) Zindar Brunelle

DATE: 2/8/18

TIME: NA

DATE: 2/8/19

TIME: NA

RECEIVED BY: (PRINT)

(SIGN)

RECEIVED BY: (PRINT)

(SIGN)

RECEIVED FOR LABORATORY BY:

(SIGN)

DATE: 2/09/18

TIME: 10:35

DATE:

TIME:

DATE:

TIME: