

*Brunelle & Clark Consulting, LLC*

**CONSOLIDATED  
ASBESTOS & LEAD  
IDENTIFICATION REPORT  
HUMBOLDT COUNTY  
SHERIFF'S OFFICE  
826 4<sup>th</sup> STREET  
EUREKA, CA**



September 17, 2022

Project # 2200308-B

Prepared for:  
Humboldt County Public Works Dept.  
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## **1.0 PURPOSE**

This consolidated report combines the findings of six asbestos and/or lead survey reports this office has produced for the Humboldt County Sheriff's Office space, which is located on the ground floor of the Humboldt County Courthouse building, in Eureka, CA.

**The combined findings of the six (6) previous reports include the asbestos and lead materials identified to date, for the specific areas and materials included in the six previous surveys. This consolidated report does not include all areas and materials in the Sheriff's Office space, and is not a comprehensive survey report of the Sheriff's Office space.**

This consolidated report provides for compliance with the EPA National Emission Standards for Hazardous Air Pollutants (NESHAP) asbestos regulations, 40 CFR, Part 61, Subpart M; the Cal/OSHA asbestos regulation 8 CCR 1529; and the California Health & Safety Code.

The consolidated report also provides for compliance with the Cal/OSHA Lead in Construction Standard Title 8, CCR Section 1532.1; the California Code of Regulations Title 17, CCR 35000-36100; and the EPA Lead Renovation, Repair, and Painting Rule, 40 CFR Part 745.

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

## **2.0 EXECUTIVE SUMMARY**

### **Previous Asbestos & Lead Surveys**

This consolidated report combines the findings of six asbestos and/or lead survey reports this office has produced for the Humboldt County Sheriff's Office space. The previous survey reports are listed below.

- *“Asbestos Survey & Lead Paint Sampling Of Walls & Ceilings At The Humboldt County Sheriff's Office, 826 4<sup>th</sup> Street, Eureka, CA,” B&CC project #2200308, dated September 16, 2022.*

- *“Limited Asbestos Survey Of Wall Materials To Be Disturbed By The Sheriff’s Lobby Remodel Project, At The Humboldt County Sheriff’s Office, 826 4<sup>th</sup> Street, Eureka, CA,”* B&CC project #2000203, dated October 22, 2020.
- *“Limited Asbestos Survey, Lieutenant Office And Old Supply Rm. 1, 2 & 3, Sheriff’s Office, Ground Floor, Humboldt County Courthouse, 825 5<sup>th</sup> Street, Eureka, CA,”* B&CC project #1900305, dated April 26, 2019.
- *“Limited Asbestos Survey For Cabinet Replacement, Office & Breakroom, Sheriff’s Office, Ground Floor, Humboldt County Courthouse, 825 5<sup>th</sup> Street, Eureka, CA,”* B&CC project #1900303, dated April 8, 2019.
- *“Limited Asbestos Sampling Survey For Electrical & Mechanical Maintenance, First Floor N-E Hall & Sheriff’s Office Custodial Closet, Humboldt County Courthouse, 825 5<sup>th</sup> Street, Eureka, CA,”* B&CC project #1600303, dated March 27, 2016.
- *“Asbestos Survey & Paint Sampling, Seismic Damage Repair Project #210500, Humboldt County Courthouse, 825 5<sup>th</sup> Street, Eureka, CA,”* TCC project #1300305, dated November 15, 2013.

### **Consolidated Asbestos & Lead Report**

This consolidated report includes the asbestos and lead materials identified in the previous six survey reports, which include the specific materials and areas listed below.

This consolidated report uses the room names and numbers assigned in the most recent survey report, project #2200308. The combined survey area with the room names and numbers used in this report is shown on Figure 1, Appendix A. **Note:** not all materials in the combined survey area have been sampled.

### **The consolidated asbestos report “includes” the following materials and areas:**

- All wall finish & ceiling finish materials, including ceiling tile/mastic and drop ceiling panels, in all rooms throughout the Sheriff’s Office space, excluding the ceramic wall tile in the Men’s Locker Room area.
- All baseboard mastic in all rooms throughout the Sheriff’s Office space.
- Flooring materials in the Break Room, Office & Old Photo Lab, Room 24, SCOP, Office & Control Room, and the section of the corridor outside the Office & Control Room.
- Concrete wall and slab in the SCOP, Office & Old Photo Lab, Rm. 2, Corridor 4 & Evidence Storage Area, which represents the concrete walls, floors and ceilings throughout the Sheriff’s Office space.
- Ceramic wall & floor finish in the shower area of the Shower 2 room.
- Sink pan undercoat on the underside of the sink pan in Rm. 6, Rm. 24, and Break Room.
- Mortar and mortar patch associated with the glass window blocks in the Evidence Storage Area.

**The consolidated asbestos report “does not include” the following materials and areas:**

- Flooring materials in any room or space, with the exception areas specified above.
- Ceramic wall tile in the Men’s Locker Room Restroom and Shower areas.
- Inspection and identification of potential asbestos containing pipe and/or duct insulation above drop ceilings, or in any other area. **Note:** suspect pipe insulation is visible in the in the Evidence Storage area, the mechanical closet in Corridor 3, and is likely present in other areas.
- Any materials on the exterior of the building.
- Any materials or spaces not specifically identified in the areas specified above.

**The consolidated lead paint sampling report “includes” the following materials and areas:**

- Wall finish in the Office & Old Photo Lab, SCOP, Office & Control Room, the corridor section outside the Office & Control Room, and the Shower 2 room.
- Cabinets and door scheduled for demolition in the Office & Control Room.
- Ceramic wall and floor tile in the shower area of the Shower 2 room.
- Flaking wall and ceiling paint in the Evidence Storage room.
- No other materials or spaces are included in the lead paint sampling.

**Asbestos Materials Identified**

The six previous asbestos survey reports identified **four (4) types of materials that contain asbestos within the Sheriff’s Office space.**

**Note: there is likely asbestos containing flooring in the rooms and areas where flooring has not been sampled.**

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

**Lead Paint Identified**

The previous lead sampling reports identified **Lead Based Paint (LBP), and lead content less than LBP, on building components within the current renovation project area.**

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

### 3.0 ASBESTOS MATERIALS IDENTIFIED

The six previous asbestos survey reports identified four (4) types of materials that contain asbestos within the Sheriff's Office space.

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

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

The asbestos materials identified in the six previous asbestos survey reports are listed by category below.

One materials was found to be Asbestos Containing Construction Material (ACCM), and is listed below:

#### ACCM

- **Concrete surfacing texture, skip trowel pattern** (Project #1300305)

Three materials are categorized as Asbestos Containing Material (ACM), and are listed below.

#### ACM

- **Remnant black flooring mastic** (Project #'s 2200308 & 1900305)
- **Vinyl floor tile, 9"x9", brown w/splotches & associated black mastic** (Proj. # 1900305)
- **Tarpaper, black, on floor** (Project #1900303)

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

For specific survey details, sample locations, all sample data, and all laboratory reports, refer to the previous survey reports.

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

**Consolidated Asbestos & Lead Identification Report (9/17/22)**  
**Humboldt County Sheriff's Office**  
**826 4<sup>th</sup> Street**  
**Eureka, CA**

<b>MATERIAL</b>	<b>LOCATION</b>	<b>QUANTITY</b>	<b>ASBESTOS CONTENT &amp; TYPE</b>	<b>OSHA CLASSIFICATION</b>	<b>NESHAP CATEGORY</b>	<b>WASTE DISPOSAL CLASSIFICATION</b>
<b>Walls &amp; Ceilings Survey</b> (Project #2200308, Dated 9/16/22)						
<b>Black Mastic</b> (remnant black flooring mastic mixed with yellow glue)  <b>Note:</b> the overlaying sheet flooring in contact with the black mastic is contaminated	<b>Office &amp; Control Room,</b> under the sheet flooring on the concrete slab in the east section of the room, and potentially on the concrete slab under the wood platform in the west section of the room (See Fig. 2)	Approx. 150 SF	2% CH	ACM, Class II abatement if by "hand" methods  Class I abatement if by "mechanical" means	Category I Non-Friable ACM & not RACM* if abated by "hand" methods  Friable and RACM if abated by "mechanical" means"	Non-Friable asbestos waste if abated by hand methods  Friable waste if abated by mechanical means
<b>Lieutenant Office &amp; Old Supply Room Survey</b> (Project #1900305, Dated 4/26/19)						
<b>Vinyl Floor Tile (9"x 9"), brown with splotches &amp; associated Black Mastic</b>  <b>Note:</b> removal and disposal of the overlaying carpet must be done by the abatement contractor	<b>Office &amp; Old Photo Lab,</b> under sheet flooring in room closest to the corridor  <b>Room 24,</b> under carpet (See Fig. 2)	Approx. 125 SF in Office & Old Photo Lab  Approx. 200 SF in Room 24	VFT = 2% CH  Mastic = 3% CH	ACM, Class II abatement if by "hand" methods  Class I abatement if by "mechanical" means	Category I Non-Friable ACM & not RACM* if abated by "hand" methods  Friable and RACM if abated by "mechanical" means"	Non-Friable asbestos waste if abated by hand methods  Friable waste if abated by mechanical means

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MATERIAL	LOCATION	QUANTITY	ASBESTOS CONTENT & TYPE	OSHA CLASSIFICATION	NESHAP CATEGORY	WASTE DISPOSAL CLASSIFICATION
<p style="text-align: center;"><b>Black Mastic</b> (remnant black flooring mastic)</p> <p><b>Note:</b> the overlaying sheet flooring in contact with the black mastic is contaminated</p>	<p style="text-align: center;"><b>Office &amp; Old Photo Lab,</b> under sheet flooring on concrete slab (See Fig. 2)</p>	<p style="text-align: center;">Approx. 175 SF</p>	<p style="text-align: center;">2% - 3% CH</p>	<p style="text-align: center;">ACM, Class II abatement if by "hand" methods  Class I abatement if by "mechanical" means</p>	<p style="text-align: center;">Category I Non-Friable ACM &amp; not RACM* if abated by "hand" methods"  Friable and RACM if abated by "mechanical" means"</p>	<p style="text-align: center;">Non-Friable asbestos waste if abated by hand methods  Friable waste if abated by mechanical means</p>
<p><b>Office &amp; Break Room Cabinet Replacement Survey</b> (Project #1900303, Dated 4/8/19)</p>						
<p style="text-align: center;"><b>Tarpaper, black</b></p> <p><b>Note:</b> overlaying flooring layers may be contaminated, all flooring layers must be removed and disposed of by the asbestos abatement contractor</p>	<p style="text-align: center;"><b>Break Room,</b> under sheet flooring, on the concrete slab (See Fig. 2)</p>	<p style="text-align: center;">Approx. 500 SF</p>	<p style="text-align: center;">3% CH</p>	<p style="text-align: center;">ACM, Class II abatement if by "hand" methods  Class I abatement if by "mechanical" means</p>	<p style="text-align: center;">Category I Non-Friable ACM &amp; not RACM* if abated by "hand" methods"  Friable and RACM if abated by "mechanical" means"</p>	<p style="text-align: center;">Non-Friable asbestos waste if abated by hand methods  Friable waste if abated by mechanical means</p>

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<b>MATERIAL</b>	<b>LOCATION</b>	<b>QUANTITY</b>	<b>ASBESTOS CONTENT &amp; TYPE</b>	<b>OSHA CLASSIFICATION</b>	<b>NESHAP CATEGORY</b>	<b>WASTE DISPOSAL CLASSIFICATION</b>
<b>Seismic Damage Repair Survey</b> (Project #1300305, Dated 11/15/13)						
<b>Concrete surfacing Texture, skip trowel pattern</b>	<b>Room 22,</b> surfacing on the concrete walls (See Fig. 2)	Approx. 200 SF	<1% CH by initial PLM  <0.25% CH by 400 Point Count	ACCM, Class II abatement required where disturbed	ACCM Not RACM*	Non-Friable asbestos waste or general construction debris

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

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

**CH** = Chrysotile Asbestos

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

**LF** = Linear Feet

**NA** = Not Applicable

**NAD** = No asbestos detected

**PACM** = Presumed ACM

**RACM** = Regulated ACM under NESHAP regulations

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

**SF** = Square Feet

**TBD** = To be determined

## **4.0 CONCLUSIONS AND REGULATORY REQUIREMENTS FOR ASBESTOS**

### **Conclusions**

The six previous asbestos survey reports identified four (4) types of materials that contain asbestos within the Sheriff's Office space.

**All asbestos containing material must be abated prior to renovation or demolition activities that would disturb the asbestos containing materials.**

**Materials that have not been sampled must be sampled prior to renovation or demolition activities that would disturb the unsampled materials.**

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

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

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

### **Regulatory Requirements**

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

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

Friable NESHAP Regulated Asbestos Containing Material (RACM) was not identified during this survey. **A NESHAP Notification for "abatement" will not be required** to be filed prior to abatement of the asbestos containing material.

NESHAP defines the removal of any "load bearing" members" in the course of renovation work as "demolition" work. **If any "load bearing members" are to be removed during the project,**

**a NESHAP Notification for “demolition” will need to be filed** with the North Coast Unified Air Quality Management District (NCUAQMD), at least 10 days prior to demolition work.

**If NESHAP notification for abatement or demolition does become required, the relevant previous survey report must be submitted along with this consolidated report.**

Cal/OSHA regulates any disturbance of any material containing any amount of asbestos. All abatement or demolition of the materials containing asbestos will require compliance with the Cal/OSHA regulations regarding asbestos in construction.

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

All asbestos abatement or asbestos related demolition work must be conducted following Cal/OSHA defined asbestos abatement methods. See the Cal/OSHA section below for further discussion of regulatory requirements.

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

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

### **Identified ACM & ACCM**

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

**ACM Vinyl Floor Tile & ACM Black Flooring Mastic:** Any abatement or disturbance of the asbestos containing vinyl floor tile and black flooring mastic identified in this report must be done by a licensed asbestos abatement contractor. Class II asbestos abatement methods are required for abatement by “hand” methods, with disposal as “non-friable” asbestos waste.

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

**ACM Tarpaper:** Any abatement or disturbance of the asbestos containing black tarpaper identified in this report must be done by a licensed asbestos abatement contractor using Class II methods, with disposal as “non-friable” asbestos waste.

**ACCM Concrete Surfacing Texture:** The concrete surfacing texture identified in this report contains asbestos. The material was found to contain <1% asbestos therefore, the material is defined as ACCM. While the ACCM designation excludes the material from regulation under

NESHAP, Cal/OSHA requires Class II methods for abatement/disturbance of the material by a registered asbestos abatement contractor. It is recommended herein to augment the standard Class II abatement with negative air containment of the abatement area.

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

## **5.0 LEAD PAINT IDENTIFIED**

The paint sampling for lead included representative sampling of specified building components within two of the previous survey project areas.

### **Paint Chip Sampling**

The previous lead sampling reports identified Lead Based Paint (LBP), and lead content less than LBP, on building components within the current renovation project area.

Paint chip sample results are placed in one of three categories, based on the weight of lead in the paint compared to the overall weight of the paint. The three categories are listed below.

- **Lead Based Paint (LBP)** is defined as paint with a lead content at or above 5,000 parts per million (ppm), or at or above 0.5% by weight.
- **Lead Containing Surface Coatings (LCSC)** are paints with lead content that range from 5.0 ppm to 4,999 ppm, or 0.0005% up to 0.5% by weight.
- **Lead Free** are analytic results of <5.0 ppm lead and are deemed to be essentially “lead free.”

By paint chip analyses: **Three (3) sampled component were identified to have Lead Based Paint (LBP), and twelve (12) were found to have lead content less than LBP.**

The sampled component types identified to contain significant lead content are listed by category below.

### **Lead Based Paint (LBP)**

- Concrete ceilings & walls in the Evidence Storage Area (Project # 2200308)
- Ceramic wall tile in the shower area of the Shower 2 room (Project # 2200308)

### **Lead Containing Surface Coating (LCSC)**

- Plaster & concrete walls in the SCOP, Office & Control, Corridor, Shower 2, and Office & Old Photo Lab (Project #'s 2200308 & 1900305)

All other sampled component were found to contain trace quantities of lead. See Table 3, Appendix B for all sampling data, and refer to the previous reports for all laboratory analysis reports.

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

### **Lead In Paint**

Lead Based Paint (LBP), and lead content less than LBP, were found on several building components within the current renovation project area.

Lead Based Paint was identified on the ceilings and walls in the Evidence Storage Area. The ceiling paint has significant flaking and is falling on the surfaces below. **The flaking LBP, and paint chips and dust on the surfaces and floor below, is a “Lead Hazzard,” and requires an immediate stabilization and cleanup response.**

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

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

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

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

Exposure Assessment requires the collection of personal air samples to be submitted for laboratory analyses of lead content, to determine if the Action Level (AL) or the Permissible Exposure Limit (PEL) for airborne lead will be met or exceeded during the work.

## **7.0 ASBESTOS REGULATIONS**

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

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

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

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

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

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

### **EPA NESHAP**

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

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

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

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

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

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

### **Cal/OSHA**

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

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

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

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

### **DTSC**

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

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

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

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

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

## **8.0 LEAD REGULATIONS**

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

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

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

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

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

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

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

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

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

### **Cal/OSHA Compliance Measures for Lead Related Construction Work**

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

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

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

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

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

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

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

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

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

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

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

### **Lead Containing Waste**

Both State and Federal laws regulate the disposal of lead containing materials in landfills. In California, the disposal of lead containing materials is regulated by the Department of Toxic Substance Control (DTSC). If demolition debris potentially contains lead containing material; the waste stream must be tested for lead content, and characterized for proper waste disposal. Completion of a ‘waste profile’ requires that at least one representative bulk sample of the waste stream be collected and submitted for laboratory analysis of lead content for waste characterization.

The results of the lead waste characterization determine the “hazard level” of waste, which can range from unrestricted “general construction debris,” California hazardous waste, and highly restrictive Resource Conservation and Recovery Act (RCRA) federal “hazardous” waste.

Generation of waste materials that meet the California hazardous waste criteria require the generator to obtain a Temporary State Hazardous Waste Id Number. Hazardous waste haulers and disposal sites are also required to have a State Id Number.

Generation of more than 100 kg (220 lbs.) of waste materials that meet the federal (RCRA) waste criteria require the generator to obtain a Temporary Hazardous Waste EPA Id Number. Hazardous waste haulers and disposal sites are also required to have an EPA Id Number for RCRA waste.

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

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

### **Painted Metal Recycling**

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

## **9.0 DISCLAIMER**

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

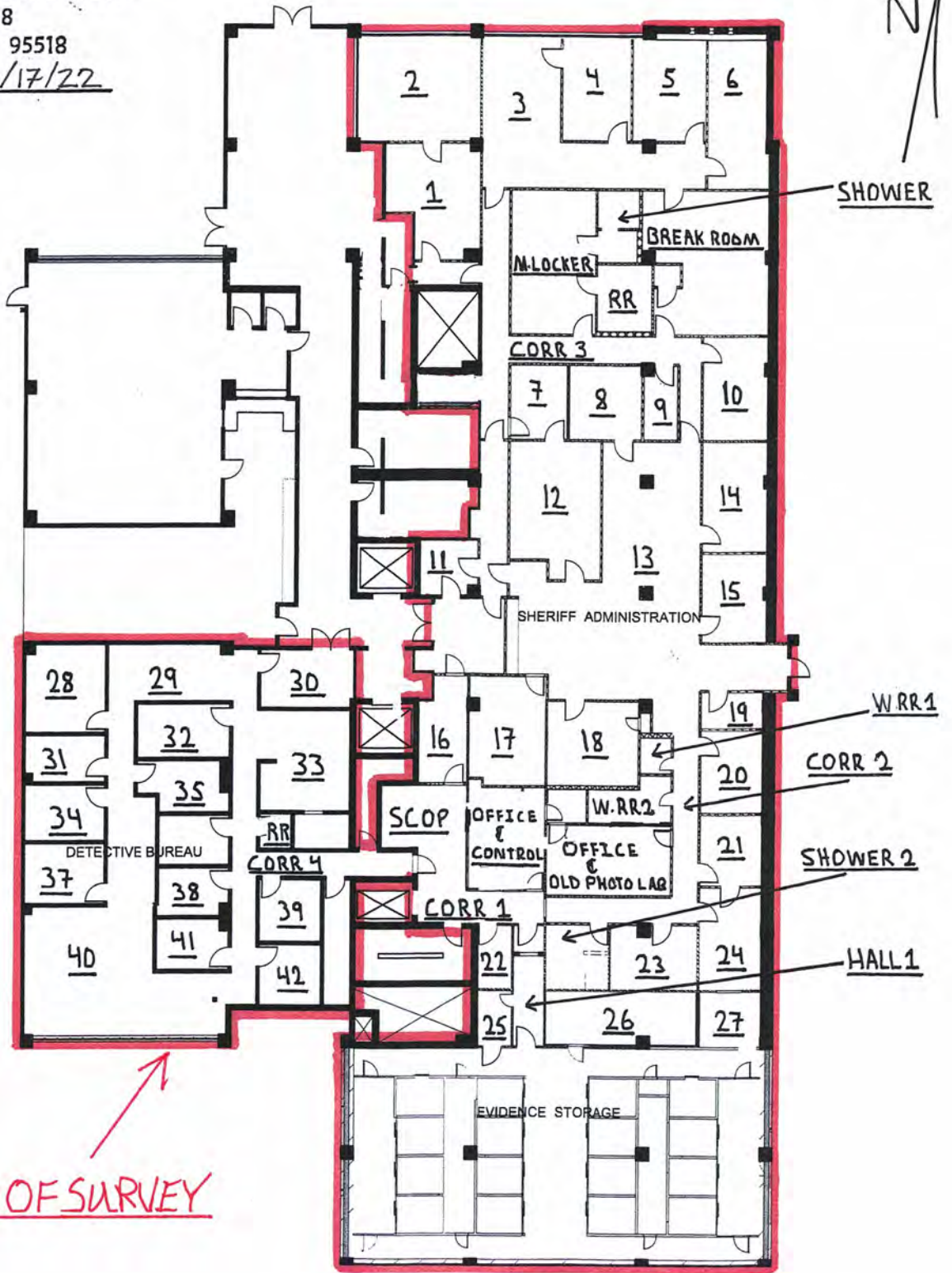
agreement and the provisions thereof. All findings, conclusions, and analytical data presented in this report are based on the information obtained by Brunelle & Clark Consulting, LLC's survey and by the laboratory analysis.

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

-end of text-

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**APPENDIX A**  
**Figures**



AREA OF SURVEY

**Consolidated Asbestos & Lead  
Identification Report**  
Humboldt County Sheriff's Office  
826 4th St., Eureka, CA

FIG. 1



**ASBESTOS LOCATIONS**

- ACM Black mastic, remnant flooring mastic under the sheet flooring & wood platform, on the concrete slab
- ACM Vinyl floor tile (9"x9"), brown with splotches & associated ACM Black Mastic, under carpet on concrete
- ACM Tarpaper, black, under flooring on concrete slab
- ACCM Surfacing texture, skip trowel, on concrete walls

Note: see Table 2 for material & location details

**Consolidated Asbestos & Lead Identification Report**  
 Humboldt County Sheriff's Office  
 826 4th St., Eureka, CA

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**APPENDIX B**  
**Tables**

**TABLE 3  
PAINT CHIP SAMPLING DATA**

**Consolidated Asbestos & Lead Identification Report (9/17/22)  
Humboldt County Sheriff's Office  
826 4<sup>th</sup> Street  
Eureka, CA**

<b>Sample ID</b>	<b>Sample Location</b>	<b>Component Description</b>	<b>Lead Content % weight</b>	<b>Lead Content ppm or mg/kg</b>	<b>Paint Classification</b>	<b>Surface Coating Material</b>	<b>Color</b>	<b>Substrate</b>
<b>Walls &amp; Ceilings Survey</b> (Project #2200308, Dated 9/16/22)								
<b>P1</b>	<b>Evidence Storage</b>	<b>Ceiling</b>	<b>1.0</b>	<b>10,000</b>	<b>LBP</b>	<b>Paint</b>	<b>Tan</b>	<b>Concrete</b>
<b>P2</b>	<b>Evidence Storage</b>	<b>Ceiling, beam</b>	<b>.73</b>	<b>7,300</b>	<b>LBP</b>	<b>Paint</b>	<b>Brown</b>	<b>Concrete</b>
P3	Evidence Storage	Ceiling	.44	4,400	LCSC	Paint	Tan	Concrete
P4	Evidence Storage	Wall	.16	1,600	LCSC	Paint	White-tan	Concrete
<b>P5</b>	<b>Shower 2, shower wall</b>	<b>Ceramic wall tile</b>	<b>.72</b>	<b>7,200</b>	<b>LBP</b>	<b>Glaze</b>	<b>White with speckles</b>	<b>Ceramic</b>
P6	Shower 2, shower floor	Ceramic floor tile	.001	10	LCSC	Glaze	Brown	Ceramic
P7	SCOP	Wall	.19	1,900	LCSC	Paint	White-pink	Surfacing on concrete
P8	Corridor	Wall	.14	1,400	LCSC	Paint	White	Surfacing on concrete
P9	Corridor	Baseboard	.0017	17	LCSC	Paint	Blue	Vinyl
P10	Office & Control	Cabinet	.0026	26	LCSC	Paint	Gray	Wood

**TABLE 3  
PAINT CHIP SAMPLING DATA**

**Consolidated Asbestos & Lead Identification Report (9/17/22)  
Humboldt County Sheriff's Office  
826 4<sup>th</sup> Street  
Eureka, CA**

Sample ID	Sample Location	Component Description	Lead Content % weight	Lead Content ppm or mg/kg	Paint Classification	Surface Coating Material	Color	Substrate
P11	Office & Control	Wall	.33	3,300	LCSC	Paint	White	Plaster
P12	Office & Control	Door	.0044	44	LCSC	Paint	Blue	Metal
P13	Shower 2	Wall	.001	10	LCSC	Paint	White	Plaster
<b>Lieutenant Office &amp; Old Supply Room Survey</b> (Project #1900305, Dated 4/26/19)								
P1	Office & Old Photo Lab	Wall	0.066	660	LCSC	Paint	Tan	Plaster
P2	Office & Old Photo Lab	Wall	<0.01	<100	LCSC	Paint	Gray	Plaster

**LBP** = Lead Based Paint (Lead content at or above 5,000 parts per million (ppm), or 0.5% or greater by weight)

**LCSC** = Lead Containing Surface Coating (lead content that range between 5.0 ppm to 4,999 ppm, or 0.0005% up to 0.5% by weight)

**TR/LF** = Trace Lead Content, or Lead Free (analytic results of <5.0 ppm lead and are deemed to be essentially “lead free”)

**ppm** = Parts Per Million (ppm content is the same as mg/kg content)

**mg/kg** = Milligrams Per Kilogram (mg/kg content is the same as ppm content)

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

Analysis by Lead in Paint USEPA Method 3050B/6010B

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



## **COMPLIANCE ADVISORY**

### **ASBESTOS NESHAP APPLICABILITY**

### **TO DEMOLITION AND RENOVATION PROJECTS**

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

#### **Definitions**

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

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

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

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

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

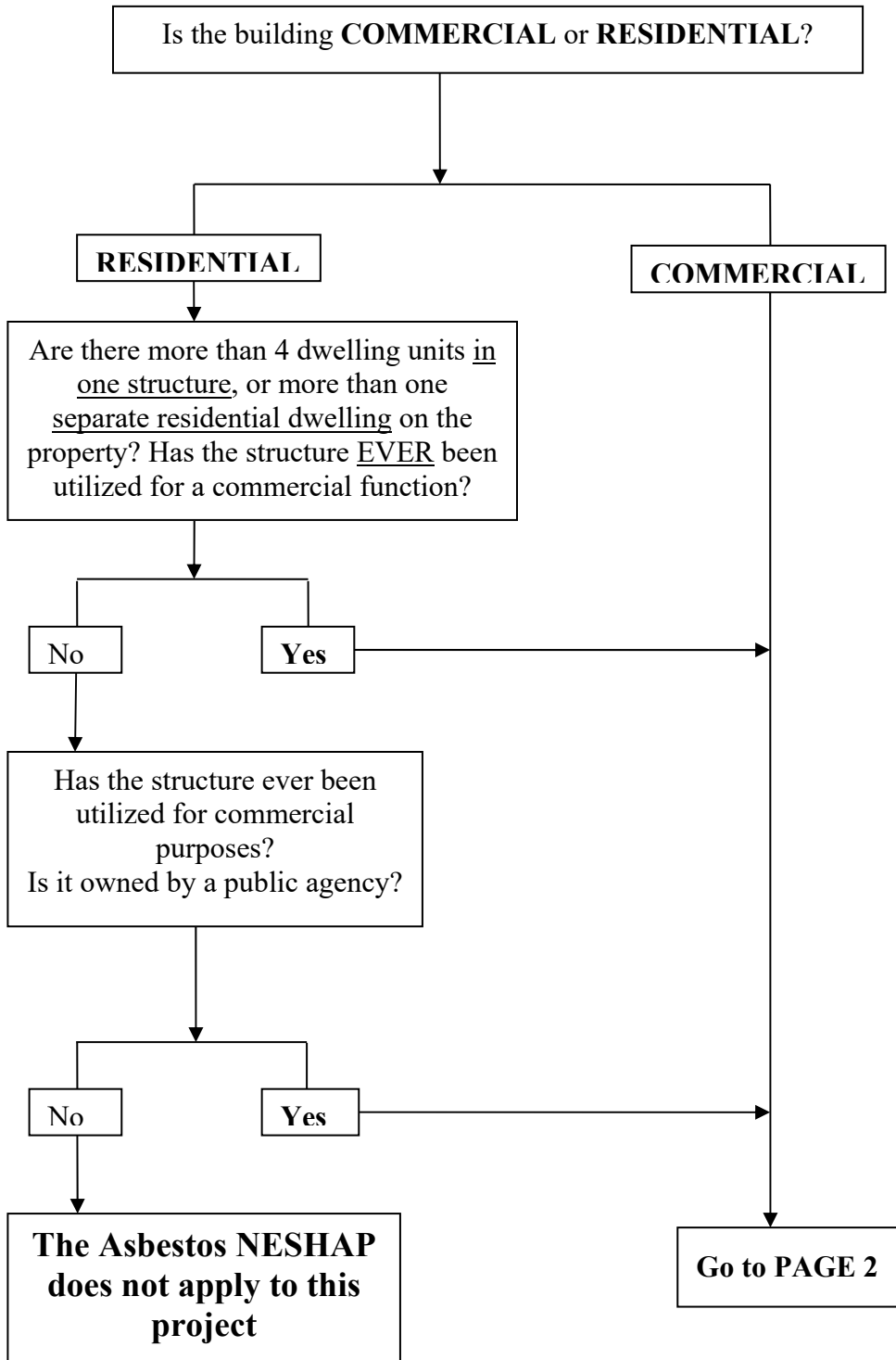
**For a demolition** - Upon completion of the asbestos survey, a demolition notification form must be submitted to the District at least 10 working days prior to the start date of the demolition. Notification of a demolition is required regardless of the amount of asbestos present. When asbestos-containing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

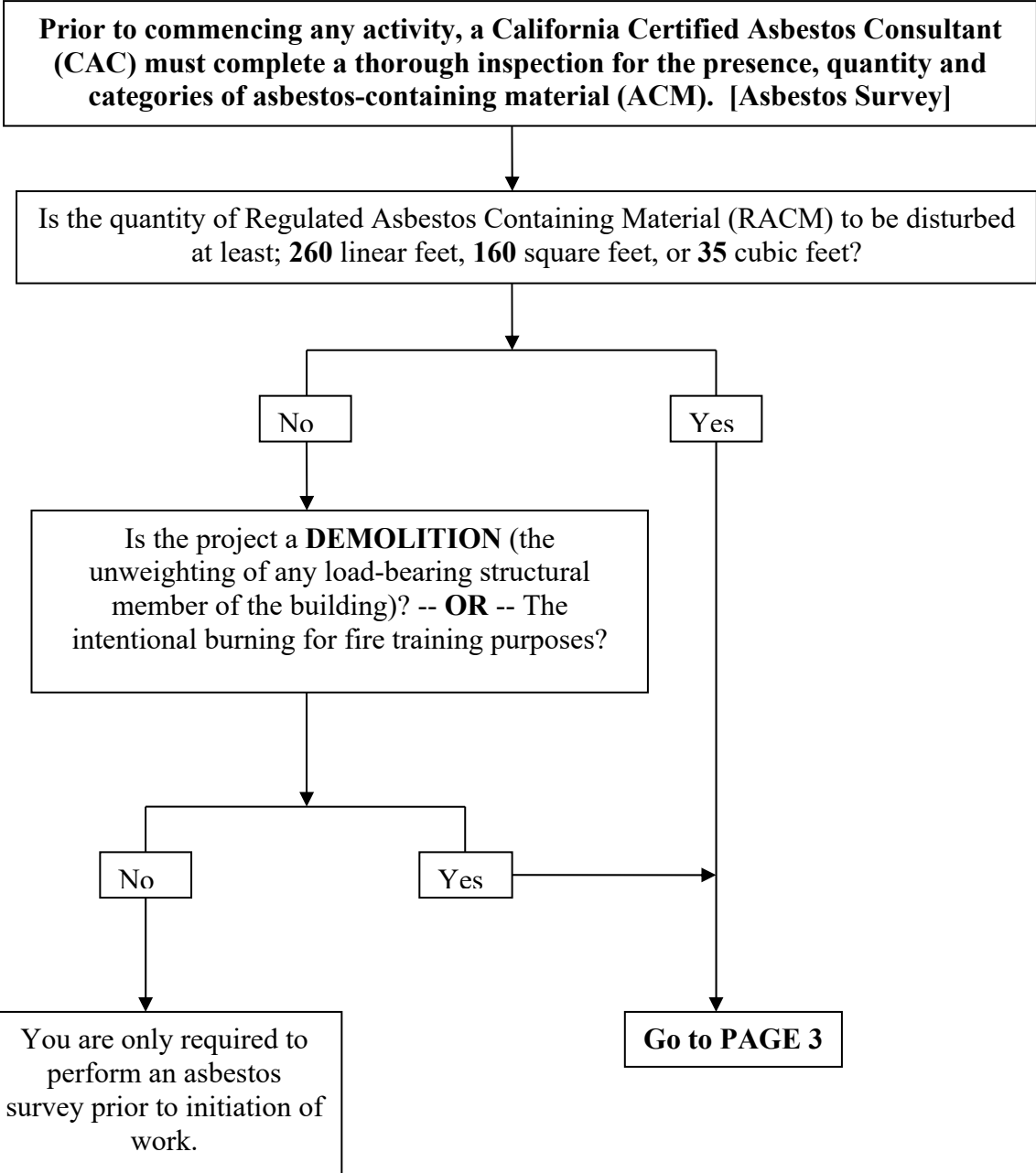
**Other Training Requirements** – *When removing or disturbing RACM, an AHERA-accredited Contractor/Supervisor must be present and all workers must be AHERA-accredited Workers (40 CFR 763, Subpart E, App. C). All training must be current.*

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

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

# GUIDE TO ASBESTOS NESHAP QUESTIONS





## REGULATED RENOVATIONS AND DEMOLITIONS

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

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

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

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



## ASBESTOS DEMOLITION AND RENOVATION NOTIFICATION FORM GENERAL INFORMATION

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

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

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

### INSTRUCTIONS:

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

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

**FEES AND OTHER REQUIREMENTS:**

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

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

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

# NORTH COAST UNIFIED AIR QUALITY MANAGEMENT DISTRICT

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

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

Operator Project #	Postmark	Date Received	Notification #
<b>I. TYPE OF NOTIFICATION</b> Circle One: <b>O</b> = Original <b>R</b> = Revised <b>C</b> = Canceled			
<b>II. FACILITY INFORMATION</b> ( <i>Identify owner, removal contractor and any other contractors</i> )			
OWNER NAME:			
Address:			
City:	State:	Zip:	
Contact:		Tel:	
ASBESTOS REMOVAL CONTRACTOR:			DOSH Reg #
Address:			
City:	State:	Zip:	
Contact:		Tel:	
OTHER DEMOLITION OR RENOVATION OPERATOR:			
Address:			
City:	State:	Zip:	
Contact:		Tel:	
<b>III. TYPE OF OPERATION</b> Circle One: <b>D</b> = Demolition <b>O</b> = Ordered Demolition <b>R</b> = Renovation <b>E</b> = Emergency Renov.			
<b>IV. IS ASBESTOS PRESENT</b> Circle One:        (Yes    No)			
<b>V. FACILITY DESCRIPTION</b> ( <i>Include building name, number and floor or room numbers</i> )			
Bldg. Name:			
Address:			
City:	State:	Zip:	County:
Site Location:			
Building Size:	# of Floors:	Age in Years:	
Present Use:		Prior Use:	
<b>VI. PROCEDURE USED TO DETECT THE PRESENCE OF ASBESTOS MATERIAL</b> {An asbestos survey performed by a California "Certified Asbestos Consultant", is required to process this notification}			
C.A.C. Certification #		Certification Expiration Date:	
<b>VII. APPROXIMATE AMOUNT OF ASBESTOS, INCLUDING:</b> 1. Regulated ACM to be Removed 2. Category I ACM to be Removed 3. Category II ACM to be Removed		RACM To Be Removed	Nonfriable Asbestos Material To Be Removed
		Category I	Category II
		Units	
Pipes			Ln Ft:      Ln m:
Surface Area			Sq Ft:      Sq m:
Vol. RACM Off Facility Component			Cu Ft:      Cu m:
<b>VIII. SCHEDULED DATES ASBESTOS REMOVAL</b> ( <i>MM/DD/YY</i> )		Start:	Complete
<b>IX. SCHEDULED DATES DEMO/RENOVATION</b> ( <i>MM/DD/YY</i> )		Start:	Complete
<b>X. DESCRIPTION OF PLANNED DEMOLITION OR RENOVATION WORK, AND METHOD(S) TO BE USED:</b>			
<b>District Use Only</b>	Date Payment Received:	Payment Method:	Check Number:      Amount:

NOTIFICATION OF DEMOLITION OR RENOVATION (continued)

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

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

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

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

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**APPENDIX D**  
**Consultant Certifications**

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

**Zindar Brunelle**

Name



Certification No. **14-5295**

Expires on **10/15/23**

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



STATE OF CALIFORNIA  
 DEPARTMENT OF PUBLIC HEALTH



**LEAD-RELATED CONSTRUCTION CERTIFICATE**

INDIVIDUAL:



Zindar Brunelle

CERTIFICATE TYPE:

Lead Inspector/Assessor  
 Lead Supervisor

NUMBER:

LRC-00000482  
 LRC-00000481

EXPIRATION DATE:

9/2/2023  
 9/2/2023

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

**CALINC TRAINING LLC**

This is to certify that

**Zindar Brunelle**

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

**Asbestos Building Inspector Refresher 1011**

as required under Toxic Substances Control Act Title II

1/5/2022

Class Date(s)

170527

Certificate Number

David Esparza - President

CA-001-08  
 Cal/OSHA Number

1/5/2023

Expiration Date

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