SPECIFICATIONS
FOR ASBESTOS ABATEMENT
& LEAD RELATED DEMOLITION WORK
FOR DEMOLITION OF THE
COMMERCIAL BUILDING LOCATED AT
104 “W” STREET
EUREKA, CA

January 14, 2024

Project 2308201-B

Prepared for:
Humboldt Transit Authority
Attn: Jim Wilson
Equipment & Facilities Manager
133 “V” Street
Eureka, CA 95501
(707) 443-0828

Prepared by:
Brunelle & Clark Consulting, LLC
P.O. Box 1138
Arcata, CA 95518
(707) 672-5345

TABLE OF CONTENTS

1.0 PROJECT DESCRIPTION 1

1.1 Hazardous Materials Survey 1
1.2 Scope of Asbestos Abatement Work 2
1.3 Scope of Lead Related Work 3
1.4 Definitions 5

2.0 PROJECT REQUIREMENTS 6

2.1 Regulations 6
2.2 Owner Responsibilities 7
2.3 General Contractor Responsibilities 7
2.4 Abatement Contractor Responsibilities 8
2.5 Environmental Consultant Responsibilities 9
2.6 Required Licensure 9
2.7 Required Asbestos Abatement Training 9
2.8 Required Lead Related Work Training 10
2.9 Insurance Requirements 10
2.10 Bonding Requirements 10
2.11 Project Schedule 10
2.12 Notifications 11
2.13 Submittals 12
2.14 Notice Postings 13
2.15 Site Use and Security 14
2.16 Emergency Planning 14
2.17 Fire Protection 15

3.0 GENERAL EXECUTION 15

3.1 Worksite Preparation 15
3.2 General Project Procedures 16
3.3 Alternative Procedures 17
3.4 Regulated Areas For Asbestos 17
3.5 Regulated Areas For Lead 18
3.6 Personnel Air Monitoring For Asbestos & Lead 19
3.7 Post-Abatement Clearance for Asbestos 20
3.8 Clearance for Lead Related Work 20
3.9 Equipment 21
3.10 Materials 22

4.0 ABESTOS ABATEMENT PROCEDURES 22

4.1 General Abatement Procedures 22
4.2 Abatement of ACM Sink Pan Undercoat 23

4.3 Abatement of RACM Sheet Flooring. 23
4.4 Abatement of RACM Remnant Sheet Flooring Backing. 23

5.0 LEAD DEMOLITION PROCEDURES 24

5.1 General Procedures For Lead Related Work. 24

6.0 ASBESTOS AND LEAD WASTE 25

6.1 Hazardous Waste. 25
6.2 Transport of Hazardous And Non-Hazardous Waste. 26
6.3 Disposal of Asbestos Waste.....27
6.4 Disposal of Lead Waste. 28

APPENDIX A Asbestos & Lead Survey Report

SPECIFICATIONS
FOR ASBESTOS ABATEMENT
& LEAD RELATED DEMOLITION WORK
FOR DEMOLITION OF THE
COMMERCIAL BUILDING LOCATED AT
104 "W" STREET
EUREKA, CA

1.0 PROJECT DESCRIPTION

These specifications apply to the asbestos abatement and lead related demolition work that is required for demolition of the commercial building located at 104 "W" Street, in Eureka, CA.

1.1 Hazardous Materials Surveys

An asbestos and lead survey was completed for the demolition project in December, 2023, by Brunelle & Clark Consulting LLC.

The survey report is titled *"Asbestos Survey & Lead Paint Sampling For Demolition Of Commercial Building, 104 "W" Street, Eureka, CA,"* is dated December 30. 2023, and is contained in Appendix A of this Specifications document.

Asbestos Containing Materials:

The asbestos survey included all suspect materials on the interior, exterior, and roof of the subject building. Asbestos was found present in three (3) types of building materials, which are listed by category below.

One (1) material is categorized as Asbestos Containing Material (ACM).

<u>ACM</u>

- **Sink pan undercoat, black**

Two materials are categorized as NESHAP Regulated ACM (RACM).

<u>RACM</u>

- **Sheet flooring, tan**
- **Remnant sheet flooring backing, gray**

For descriptions and locations of the Project asbestos containing material, see the Project asbestos survey report in Appendix A of this Specifications document.

Lead Containing Materials:

The sampling for lead in paint was conducted using a portable XRF (X-ray fluorescence) paint analyzer, and included representative samples of building components on the interior and exterior of the project building.

Lead Based Paint was identified on building components on the interior and exterior of the "Original Building Section," which includes the east half of the building. The sampled component types identified to contain significant lead content are listed by category below.

Lead Based Paint (LBP)

- **Interior window trim:** all "interior" window trim components in the "Original Building Section."
- **Exterior window & door trim:** all "exterior" window & door trim on the "Original Building Section."
- **Porch ceiling planks & trim:** wood ceiling planks and associated trim of the covered porch on the front of the "Original Building Section."
- **Wood lap siding:** "original wood lap siding," located behind the newer wood shingle siding on the "Original Building Section."

For descriptions and locations of the building components containing Lead Based Paint, see the Project survey report in Appendix A of this specification document.

1.2 Scope of Asbestos Abatement Work

A. The Project asbestos abatement work includes the removal of all "material types" identified to contain any amount of asbestos," from all locations on the interior, exterior, and immediate vicinity of the building.

B. It is the responsibility of the General Contractor and the Abatement Contractor to confirm the exact locations, and quantities of asbestos materials to be removed during the "Asbestos Abatement" project.

C. The following "material types" are included in the "Project Asbestos Abatement" scope of work:

- **Sink pan undercoat, black**
- **Sheet flooring, tan**
- **Remnant sheet flooring backing, gray**

For material location and quantity details, see the Project asbestos survey report in Appendix A of this Specifications document.

D. Any suspect “material type” that is discovered during the Project, that was not identified in the asbestos survey, must be is presumed or confirmed to contain asbestos, and will be included in the “Asbestos Abatement” scope of work.

E. The Abatement Contractor **may** request additional compensation for abatement of discovered “material types” not identified in the Project asbestos survey.

F. The Abatement Contractor **may not** request additional compensation for abatement of “material types” that were identified in the Project asbestos survey.

G. The asbestos abatement work includes all clean-up, storage, proper transport, and proper disposal of all material and debris containing any amount of asbestos, including all contaminated disposable equipment used for the project.

H. Abatement Contractor shall furnish all labor, materials, services, and equipment required to safely execute asbestos abatement operations.

1.3 Scope of Lead Related Work

A. Lead Based Paint was identified on building components on the interior and exterior of the “Original Building Section,” which includes the east half of the building.

B. It is the responsibility of the General Contractor, Abatement Contractor, and Demolition Contractor to confirm the exact types, locations, and quantities of lead painted building components to be impacted by the Lead Related Demolition Work.

C. The Project building is tentatively scheduled for full mechanical demolition. If full mechanical demolition that includes lead painted building components is conducted, the following lead demolition tasks will be required:

- All mechanical demolition, and associated activities that disturb lead containing materials, must be conducted as Lead Related Construction Work involving LBP. All CCR Title 17, and Cal/OSHA 8CCR 1532.1, work practices and requirements for work involving LBP will be required.

- A Cal/OSHA defined “regulated area” for lead must be established around the building prior to commencement of demolition activities. The regulated area should start a minimum of 20 feet out from the building, and be sufficient to contain all heavy demolition equipment and demolition debris.

- All personnel working within the regulated area, including heavy equipment operators, must have proper lead work training and certification.

- All personnel working within the regulated area must wear proper personal protective equipment, which includes respirators and protective clothing.

- Representative personal air monitoring for lead is required for any personnel working inside the regulated area.

- All building demolition must be conducted using wet methods. Building materials being demolished must be kept wet at all times during the demolition process. A sufficient supply of water, with sufficient water pressure to accomplish the continuous material wetting, will be required.

- Dust generated by the demolition process must not travel outside the regulated area. If visible dust does travel outside the regulated area, the demolition work must stop immediately, and should not resume until the cause of the dust migration has been remedied.

D. If manual demolition of any lead painted building components is conducted during the building demolition project, the following lead demolition tasks will be required:

- All manual demolition, or other activities that disturb lead containing materials, must be conducted as Lead Related Construction Work involving LBP. All CCR Title 17, and Cal/OSHA 8CCR 1532.1, work practices and requirements for work involving LBP will be required.

- A Cal/OSHA defined “regulated area” for lead must be established for all areas where lead related demolition work is conducted.

- All personnel working within the regulated areas must have proper lead work training and certification.

- All personnel working within the regulated area must wear proper personal protective equipment, which includes respirators and protective clothing.

- Representative personal air monitoring for lead is required for any personnel working inside the regulated areas.

E. The General Contractor, Abatement Contractor, and Demolition Contractor are responsible for conducting “lead waste characterization,” to determine the Federal and State waste classification for all lead containing waste generated by this Project.

F. All lead containing waste must be properly transported and disposed of according to the Federal and State waste classification determined by the lead waste characterization analysis results.

G. The Abatement Contractor and/or Demolition Contractor shall furnish all labor, materials, services, and equipment required to safely execute the lead related demolition work operations.

H. The Project includes clean-up, storage, proper transport, and proper disposal of all lead containing debris, including all contaminated disposable equipment used for the project.

1.4 Definitions

A. **"Architect"** refers to the Architect for the Project.

B. **"General Contractor"** herein refers to the General Contractor for the Project.

C. **"Project"** refers to asbestos abatement work and demolition of materials lead containing lead.

D. **"Owner"** refers to the site owner.

E. **"Project Manager"** refers to project manager assigned by the Site Owner.

F. **"Environmental Consultant"** refers to the project Certified Asbestos Consultant and Certified Lead Inspector/Assessor.

G. **"Abatement Contractor"** refers to the licensed asbestos abatement and lead material demolition contractor.

H. **"Demolition Contractor"** refers to the Demolition Contractor for this project.

I. **"Competent person"** *means, in addition to one who is capable of identifying existing and predictable hazards in the surroundings or working conditions which are unsanitary, hazardous, or dangerous to employees, and who has authorization to take prompt corrective measures to eliminate them, one who is capable of identifying existing asbestos hazards in the workplace and selecting the appropriate control strategy for asbestos exposure, who has the authority to take prompt corrective measures to eliminate them* (8 CCR 1529).

J. **Asbestos Containing Construction Materials (ACCM):** are materials that contain asbestos in amounts between 0.1% and 1.0%.

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

L. **Regulated Asbestos Containing Materials (RACM):** are a category of ACM that is subject to EPA NESHAP regulation, which includes friable ACM and ACM that has or will become friable.

M. **"Friable"** asbestos material is defined as material containing >1% asbestos, that when dry, may be crumbled, pulverized, or reduced to powder by hand pressure.

N. **"Lead-related construction work"** *means any construction, alteration, painting, demolition, salvage, renovation, repair, or maintenance of any residential or public building, including preparation and cleanup, that, by using or disturbing lead-containing material or soil, may result in significant exposure of adults or children to lead* (17 CCR 35040).

2.0 PROJECT REQUIREMENTS

2.1 Regulations

A. **General applicability of all federal, state, and local regulations, standards and codes governing asbestos abatement, lead in construction, hazardous material transport, and hazardous material disposal:** Except to the extent that more explicit or more stringent requirements are written directly into the contract documents or these specifications, all applicable regulations, standards, and codes have the same force and effect and are made a part of the contract documents as if copied directly into the contract documents, or as if published copies are bound herewith.

B. Applicable regulations pertaining to asbestos work include, but are not limited to: the Cal/OSHA Asbestos Construction Standard (8 CCR 1529); the EPA National Emissions Standard For Hazardous Air Pollutants (NESHAP), 40 CFR, Part 61, Subpart M; the EPA Asbestos Hazard Emergency Response Act (AHERA) "The Asbestos-Containing Materials in Schools Rule" (40 CFR Part 763, Subpart E); and the California Code of Regulations (22 CCR 66261- 66263) pertaining to hazardous waste.

C. Applicable regulations pertaining to lead related construction work include, but are not limited to: the Cal/OSHA Construction Safety Orders, Lead (8 CCR 1532.1), the California Code of Regulations Title 17 (17 CCR 35000-36100), the EPA Lead Renovation, Repair, and Painting Rule (40 CFR Part 745), the US Department of Housing and Urban Development (HUD) "Lead Safe Housing Rule, 24 CFR 35, subparts B through R," the California Code of Regulations (22 CCR 66261- 66263) pertaining to hazardous waste, and the Federal Code of Regulations (40 CFR 260-262) pertaining to hazardous waste.

2.2 Owner Responsibilities

A. The Owner reserves the right to stop the Abatement Contractor's work at any time, if failure to comply with safety and regulatory requirements poses an imminent health and safety risk to any employee or individual present at the project site, at no cost to the Owner. If the Abatement Contractor fails to take effective measures to correct noncompliant work practices, the Owner shall contact the appropriate regulatory agency.

B. The Owner assigns full authority to the Environmental Consultant, to stop the Abatement Contractor's work and require corrective action, at no cost to the Owner, at any time, for any failure to comply with any applicable laws, regulations, and these specifications.

C. The Owner is responsible for ensuring that the Abatement Contractor and General Contractor have been provided copies of all Project asbestos and lead survey documents, theses specifications, and any subsequent addendum specifications for clarifications, changes, or additions to the Project work.

2.3 General Contractor Responsibilities

A. The General Contractor shall assume full responsibility and liability for compliance with all applicable federal, state, and local regulations pertaining to work practices, waste transport, waste disposal, protection of workers, protection of visitors to the site, and protection of persons occupying areas adjacent to the site.

B. The General Contractor is responsible for ensuring receipt of the all Project asbestos and lead survey documents, theses specifications, and any subsequent addendum specifications for clarifications, changes, or additions to the Project work.

C. The General Contractor is responsible for having read all asbestos and lead survey and specifications documents, in their entirety, and understanding all Project requirements detailed in the documents.

D. By signing the Project Agreement that incorporates this Specifications document, the General Contractor agrees to follow all requirements detailed in all Project asbestos and lead survey and specifications documents.

E. The General Contractor is responsible for ensuring that all General Contractor personnel, Subcontractors, Subcontractor personnel, and any other individual present during the Project work have been informed that asbestos and lead related work is being conducted at the site, have been provided orientation as to where the asbestos and lead related work is

being conducted, have been instruction to not enter or disturb regulated areas, and have been provided guidance to avoid accidental exposure.

F. The General Contractor must assign a "Competent Person" who is responsible for exercising general supervisory authority over all work conducted at the site, and ensuring compliance with all applicable laws, regulations, and these specifications.

G. The General Contractor shall indemnify and hold the Owner harmless for failure to comply with any applicable federal, state, and local regulations for asbestos and lead related work, on the part of himself, his employees, or his sub- contractors.

H. The General Contractor will be held responsible for any delays and associated monetary loss created by failure to comply with any applicable law or regulation, these Project Specifications, or any subsequent addendum specifications for clarifications, changes, or additions to the Project work.

I. The General Contractor shall be responsible for obtaining, and providing to the Owner, all regulatory agency notifications required for the Project.

2.4 Abatement Contractor Responsibilities

A. Abatement Contractor shall perform all asbestos and lead related work in compliance with the most recent edition of all applicable federal, state, and local regulations, standards, codes, and these specifications.

B. The Abatement Contractor is responsible for ensuring receipt of all Project asbestos and lead survey documents, theses specifications, and any subsequent addendum specifications for clarifications, changes, or additions to the Project work.

C. The Abatement Contractor is responsible for having read all asbestos and lead survey and specifications documents, in their entirety, and understanding all Project requirements detailed in the documents.

D. By signing the Project Agreement that incorporates this Specifications document, the Abatement Contractor agrees to follow all requirements detailed in all Project asbestos and lead survey and specifications documents.

E. The Abatement Contractor is responsible for providing training and medical examinations for all employees, and maintaining records of asbestos and lead training/medical examinations for all abatement personnel, as required by the applicable federal, state, and local regulations for asbestos and lead related work.

F. The Abatement Contractor shall indemnify and hold the Owner harmless for failure to comply with any applicable federal, state, and local regulations for asbestos and lead related work, on the part of himself, his employees, or his sub- contractors.

G. The Abatement Contractor will be held responsible for any delays and associated monetary loss created by failure to comply with any applicable law or regulation, these Project Specifications, or any subsequent addendum specifications for clarifications, changes, or additions to the Project work.

H. The Abatement Contractor shall be responsible for obtaining, and providing to the Owner, all regulatory agency notifications required for the Project.

2.5 Environmental Consultant Responsibilities

A. The Environmental Consultant is responsible for conducting general Project oversight per requirements detailed in an executed service agreement between the Owner and the Environmental Consulting Firm.

2.6 Required Licensure

A. The Abatement Contractor shall be licensed by the State of California, Contractors State License Board for the type of work required by the Project, which includes asbestos abatement and lead related demolition work. The Abatement Contractor shall have a valid Asbestos Endorsement to that license, and a C-22 endorsement for asbestos abatement.

B. The Abatement Contractor must successfully complete the "Cal/OSHA Employer Registration" process, and have a current "Certificate of Registration for Asbestos-related Work," issued by the Division of Occupational Safety and Health (8 CCR 341.6).

C. The Abatement Contractor must be certified by the Environmental Protection Agency (EPA), as a "Lead Safe Certified firm," per the requirements of the EPA Lead Renovation, Repair, and Painting Rule (40 CFR Part 745).

2.7 Required Asbestos Abatement Training

A. All Abatement Contractors providing asbestos abatement services that disturbs materials containing any amount of asbestos, must satisfy all Cal/OSHA training requirements in compliance with Title 8 CCR 1529, and any other applicable State and Federal regulation pertaining to asbestos abatement training.

B. All Project work that disturbs or contacts materials containing any amount of asbestos shall be supervised by an individual trained and certified as an

Asbestos Supervisor, in accordance with the requirements of the EPA Model Accreditation Plan (40 CFR 763, Subpart E, Appendix C), and who has been designated as the "Competent Person."

C. All employees (workers) who conduct asbestos abatement, or any other activity that disturbs or contacts materials containing any amount of asbestos shall be trained and certified as an Asbestos Worker, in accordance with the requirements of the EPA Model Accreditation Plan (40 CFR 763, Subpart E, Appendix C).

2.8 Required Lead Related Work Training

A. All contractors and subcontractors providing any lead related work must satisfy all requirements of the Cal/OSHA Construction Safety Orders, Lead Section (8 CCR 1532.1), the California Code of Regulations Title 17 (17 CCR 35000-36100), the EPA Lead Renovation, Repair, and Painting Rule (40 CFR Part 745), and any other applicable State and Federal regulations pertaining to lead related work training.

B. The Abatement Contractor's supervisor shall have received training as required by the Cal/OSHA Construction Safety Orders, Lead Section (8 CCR 1532.1), the California Code of Regulations Title 17 (17 CCR 35000-36100) the EPA Lead Renovation, Repair, the Painting Rule (40 CFR Part 745), and any other applicable State and Federal regulation pertaining to asbestos abatement training, and must be certified by the California Department of Public Health (CDPH) as a "Lead Supervisor."

C. All employees (workers) who conduct lead related construction work shall have received training and CDPH certification as required by the Cal/OSHA Construction Safety Orders, Lead Section (8 CCR 1532.1), the California Code of Regulations Title 17 (17 CCR 35000-36100), the EPA Lead Renovation, Repair, and Painting Rule (40 CFR Part 745), and any other applicable State and Federal regulation pertaining to lead related construction work training.

2.9 Insurance Requirements

. Provide as per "Contract."

2.10 Bonding Requirements

A. Provide as per "Contract."

2.11 Project Schedule

A. Project asbestos abatement and lead related demolition work will be scheduled by the General Contractor, if asbestos abatement and lead related demolition work is included in the "General Contract."

B. Project asbestos abatement and lead related demolition work will be scheduled by the Project Manager, if the asbestos abatement and lead related demolition work will be contracted directly with the building Owner.

C. All work shall be performed in accordance with the schedule requirements established by the General Contractor or Project Manager, and these specifications.

D. The Abatement Contractor must agree to the time frame required by the General Contractor or Project Manager, and must present a detailed project schedule showing the start time and completion time for each project task.

E. The detailed project schedule must be submitted to the Project Manager, General Contractor, and the Environmental Consultant, at least 30 days prior to the desired project start date.

F. Any changes to the schedule must be approved by the Project Manager and General Contractor, and the Environmental Consultant must be informed of all changes to the schedule at least 3 weeks prior to any project work that will be conducted following the revised schedule.

G. During the Project, the Abatement Contractor must inform the Environmental Consultant weekly, as to the work progress, and any changes to the Project schedule. The Abatement Contractor must report to the Owner, any significant changes to the agreed-on Project schedule, immediately, and in writing.

2.12 Notifications

A. The Abatement Contractor shall be responsible for filing the EPA National Emission Standards for Hazardous Air Pollutants (NESHAP) Notification for “abatement” of Regulated Asbestos Containing Materials (RACM), and the NESHAP notification for “demolition” of a structure.

Notification for asbestos abatement and/or building demolition must be submitted to the correct California Air District assigned NESHAP enforcement responsibility for the county this Project is located, and must be submitted at least 10 working days prior to abatement of any RACM and/or building demolition. The Abatement Contractor is responsible for all costs associated with filing the notifications fees.

B. The Abatement Contractor shall be responsible for filing a “Report of Use of Regulated Carcinogens,” notification with the Division of Occupational Safety and Health, which must be submitted a minimum of 24-hours prior to asbestos abatement activities.

C. The Abatement Contractor shall be responsible for filing a Cal/OSHA "Lead-Work Pre-Job Notification," with Cal/OSHA at least 24 hours prior to performing any lead related demolition work.

2.13 Submittals

A. Prior to commencement of work, the Abatement Contractor shall submit to the Owners Environmental Consultant, the following documents:

1. A detailed project schedule showing the start time and completion time for each project task.

2. Copies of the Abatement Contractor's licenses and registrations required by Section 2.6 of these specifications, including copies of any sub contractor's licenses and registrations.

3. Copies of all required agency notifications, showing proof of submittal, as required by Section 2.12 of these specifications.

4. Documentation of training and certification for all Abatement Contractor employees, supervisor, and any other company personnel, who will be conducting any asbestos abatement and lead related demolition activities, as required by Sections 2.7 & 2.8 of these specifications.

5. Documentation from a Physician that all employees who may be exposed to airborne asbestos fibers, or lead dust, have received medical evaluation, and are physically capable of working while wearing the respirator without suffering adverse health effects.

6. Documentation of respirator fit testing for all Abatement Contractor employees who will enter any regulated work area. The fit testing shall be in accordance with qualitative procedures as required by OSHA regulations, and must be for the specific respirator types required for the specific OSHA work classifications of this project.

7. Certification that all HEPA negative air machines used on this project have passed a "challenge test," conducted by a certified third party, prior to use on this site. The challenge test must have been conducted within the last 6 months for negative air machines to be exhausted to the outside air. For negative air machines to be exhausted anywhere on the interior of the building, the challenge test must be conducted onsite, immediate before use, and must be re-tested if the negative air machine leaves the site and returns.

8. Manufacturer's certification that HEPA vacuums and air filtration devices conform to ANSI Z9.2-79.

9. Copies of Material Safety Data Sheets (MSDS) for any solvents, encapsulants, paints, wetting agents, chemicals, and replacement materials to be used for this project.

B. During work activities, the Abatement Contractor shall submit to the Owners Environmental Consultant, the following documents:

1. Copies of each work area entry/exit log book. Log books must record name, affiliation, time in, time out, and respirator type for each entry into the work area.

2. Copies of daily logs indicating work locations, type of materials removed, quantity of materials removed, and number of personnel conducting each task.

3. Lab reports showing the results of all required OSHA personal air monitoring. Results shall be submitted to the Environmental Consultant within two days of the time of sampling. Failure to provide personal air monitoring lab report within the required time, will result in a stop work order, and work shall not resume until the required personal air monitoring lab reports are received by the Environmental Consultant. The Abatement Contractor will be fully responsible for any monetary loss due to any stop work order for failure to provide the required asbestos or lead personal air monitoring lab reports within the required timeframe.

4. Copies of all revised agency notifications, if required to report changes to the asbestos abatement or lead related work schedule or description, showing proof of submittal.

5. Copies of all lead waste characterization lab reports, for all lead waste sampling conducted for this project by the Abatement Contractor.

6. Copies of all accident/incident reports where injury or damage has occurred on or to the Owner's property.

2.14 Notice Postings

A. An Entry/Exit Log must be posted at the entry points of all regulated areas.

B. OSHA “Regulated Area” warning signs must be posted at all entries to regulated areas.

C. Cal/OSHA Contractor Asbestos Registration must be posted at the site.

D. Cal/OSHA “Report of Use of Regulated Carcinogens” must be posted at the site.

E. Cal/OSHA “Lead-Work Pre-Job Notification” must be posted at the site.

F. The NESHAP Abatement Notification (if applicable) must be posted at the site.

G. On-site records shall include, but not be limited to the following:

1. A written Hazard Communication Program, including all required topics, and documentation of training.

2. Emergency Action and Fire Prevention Plan.

3. Respiratory Protection Program (Include documentation of training).

4. Material safety data sheets for products at the site (MSDS warnings).

2.15 Site Use and Security

A. Confine operations at the site to the areas required for Project activities under the Contract, and as allowed by the General Contractor and Project Manager. Areas not required to be entered for the project work are not to be entered or disturbed by the Abatement Contractor or employees.

B. Access to Regulated Areas shall be restricted to authorized and properly trained personnel with adequate respirator protection, which includes the Abatement Contractor, Abatement Contractor's employees, the Owner’s Environmental Consultants, and State and Local inspectors.

C. Entry into the Regulated Areas by unauthorized individuals shall be reported immediately to the Environmental Consultant and the Project Manager.

D. The Abatement Contractor shall be responsible for site security measures throughout the duration of the Project. All Regulated Areas must be secured at the end of each work day, before the Abatement Contractor’s Supervisor leaves the site.

2.16 Emergency Planning

A. Emergency planning and procedures shall be developed by Abatement Contractor prior to commencement of Project work activities.

B. Emergency planning shall include, but are not limited to, considerations of accidental asbestos fiber release, fire, explosion, electrical hazards, slips, trips and falls, and heat related injury.

C. Abatement Contractor shall ensure that all persons entering the work area understand the Project site layout and emergency procedures.

D. Employees shall be trained in evacuation procedures in the event of work place emergencies.

1. For non-life-threatening injury or illness, employees shall decontaminate following normal procedures, with assistance from fellow workers, if necessary, before exiting the Regulated Area to obtain proper medical treatment.

2. For life-threatening injury or illness, worker decontamination shall take least priority. After measures to stabilize the injured worker, remove him or her from the work place, and obtain immediate medical treatment.

2.17 Fire Protection

A. The Abatement Contractor is responsible for developing and implementing an effective fire prevention program (8 CCR 1920).

B. The Abatement Contractor shall conduct all activities in accordance with Cal OSHA fire protection and prevention regulations for construction (8 CCR 1920, 8 CCR 1922, 8 CCR 6151).

C. A minimum of two 4A/60BC dry-chemical extinguisher shall be maintained in each work area, and shall be placed in locations in accordance with Cal OSHA Regulation 8 CCR 1922.

D. All fire extinguishers must be kept fully charged, inspected monthly, and serviced annually (8 CCR 1922).

E. The Abatement Contractor shall ensure that all personnel are aware of the locations and proper use of all fire extinguishers and other fire-fighting equipment, and receive fire extinguisher training annually (8 CCR 6151).

F. All plastic sheeting (Poly) used for creating containments or any other purpose during the Project must be “Fire-Retardant.”

G. Material Safety Data Sheets (MSDS) for fire retardant materials shall be made available upon request.

H. All combustible chemicals and debris shall be properly stored or disposed of at the end of each working day.

3.0 GENERAL EXECUTION

3.1 Worksite Preparation

A. If electrical power is available at the site, the Abatement Contractor shall have access to site electrical power, at the Owner’s expense.

B. If electrical power is not available at the site, the Abatement Contractor shall be responsible for providing a temporary power source sufficient to properly complete the Project work.

C. The Abatement Contractor is responsible for the safe installation and use of all temporary electrical equipment, in compliance with all applicable electrical code requirements and Cal/OSHA requirements for temporary electrical systems.

D. Abatement Contractor shall be responsible for providing electrical lines and other electrical related equipment required to safely complete the abatement work.

E. If water is available at the site, the Abatement Contractor shall have access to site water, at the Owner's expense.

F. If water is not available at the site, the Abatement Contractor shall be responsible for providing a temporary water source sufficient to properly complete the Project work.

G. Abatement Contractor shall be responsible for providing all hoses and other water related equipment required to safely complete abatement work.

H. Abatement Contractor shall be responsible for providing exterior waste bins for storage of all project asbestos and lead containing waste. "Hazardous" (Friable) asbestos waste, and "Hazardous" lead waste, must be stored separately. All bins must be secured with a lock.

I. The Abatement Contractor must provide a portable toilet and wash station for his employees, unless the Owner or General Contractor agree to provide them for the Project.

3.2 General Project Procedures

A. The Abatement Contractor shall provide a minimum of a 30-day notification to the Project Manager, General Contractor, and the Project Environmental Consultant prior to commencement of any Project work activities.

B. Prior to commencement of asbestos abatement and lead related demolition work, the Abatement Contractor shall coordinate all project logistics with the Project Manager, the General Contractor, and the Environmental Consultant.

C. No asbestos abatement or lead related demolition work shall be conducted until all pre-project submittals have been received, reviewed, and approved by the Environmental Consultant.

D. The Abatement Contractor must ensure that all electrical outlets and lines, throughout all areas being disturbed by asbestos abatement and demolition activities, are safely de-activated.

E. The Abatement Contractor must ensure that all electrically powered equipment used for the Project are plugged into sources equipped with ground-fault circuit interrupters (GFCI).

F. For all regulated areas where asbestos or lead related work is to be conducted, the Abatement Contractor must ensure that all HVAC systems have been shut-down and will remain shut down throughout the duration of the work, and until clearances have been issued by the Environmental Consultant.

G. All entrances to all asbestos and lead regulated areas and containments must be secured to prevent entry by unauthorized personnel.

3.3 Alternative Procedures

A. If specified procedures cannot be utilized, a request shall be made in writing to the Owner, providing details of the problem encountered and recommended alternatives.

B. Alternative procedures shall provide equivalent or greater protection than procedures that are replaced.

C. Any alternative procedures must be approved in writing by the Owner and the Owner's Environmental Consultant prior to implementation.

3.4 Regulated Areas For Asbestos

A. A "Regulated Area" must be established for all asbestos abatement work. The Regulated Area, including the "Containment," must meet all requirements of the Cal/OSHA Asbestos Regulation 8 CCR 1529.

B. Warning signs, meeting the specifications of Cal/OSHA Asbestos Regulation 8 CCR 1529, must be posted at the perimeter and entry points of "Regulated Areas" for asbestos abatement. Signs shall be posted at a distance sufficiently far enough away from work areas to permit a person to read the sign and take necessary protective measures to avoid exposure.

C. In all asbestos "Regulated Areas" and "Containments," all personnel shall wear personnel protective equipment as required in Section 3.9 of these specifications.

D. Negative air containments will be required for all interior asbestos abatement work.

E. All HEPA negative air machines to be used on this Project must have passed a “challenge test,” conducted by a certified third party, prior to use at this site.

F. Any HEPA negative air machines used on this Project, and vented to interior spaces, shall pass an “on-site challenge test,” conducted by a certified third party, prior to use at this site. Tested machines must remain onsite for the duration of the project, if a machine is removed and returned, it must again pass an “on-site challenge test,” prior to use.

G. Two layers of 6-mil poly sheeting must be installed as “critical barriers” over all doors, windows, vents, and other openings of all interior asbestos abatement “Containments.”

H. For exterior asbestos abatement “regulated areas,” two layers of 6-mil poly sheeting must be installed as “critical barriers” over all doors, windows, vents, and other openings within 20 feet of work.

I. The Environmental Consultant will conduct a pre-abatement inspection of all regulated areas, containments, and negative air conditions, prior to commencement of asbestos abatement work.

J. The Abatement Contractor must notify the Environmental Consultant at the completion of set up for each regulated area and containment, and shall not start abatement or demolition activities until the regulated area and containment have passed inspection by the Environmental Consultant.

3.5 Regulated Areas For Lead

A. A “Regulated Area” must be established for all lead related work. The Regulated Area, including the “Containment,” must meet all requirements of the Cal/OSHA Lead in Construction Standard Title 8 CCR 1532.1, the California Code of Regulations Title 17 (17 CCR 35000-36100), and the EPA Lead Renovation, Repair, and Painting Rule (40 CFR Part 745).

B. Warning signs, meeting the specifications of Cal/OSHA Lead in Construction Standard Title 8 CCR 1532.1, must be posted at the perimeter and entry points to “Regulated Areas” for lead related work. Signs shall be posted at a distance sufficiently far enough away from work areas to permit a person to read the sign and take necessary protective measures to avoid exposure.

C. In all lead “Regulated Areas” and “Containments,” all personnel shall wear personnel protective equipment as required in Section 3.9 of these specifications.

D. For interior containments: all objects must be removed or covered and sealed with plastic and duct tape; all ducts or other openings must be

sealed with plastic and duct tape; all windows and doors within the work area must be closed; all door openings must be sealed with plastic, including the door used for entry; and floors must be covered with plastic out 10 feet from the work, or greater, if necessary to contain the dust and debris.

E. For all exterior work areas: close all doors and windows within 20 feet of the work area; all door openings within the work area must be sealed with plastic; and the ground must be covered with plastic out 10 feet from the building, or greater, if necessary to contain the dust and debris. The plastic drop sheet must be secured to the wall and ground, and sealed with duct tape along the wall.

F. Vertical containment will be required, if it necessary to contain the work, and prevent dust and debris migration beyond drop cloths to adjacent areas.

G. The Environmental Consultant will conduct a pre-abatement inspection of all regulated areas, containments, and negative air conditions, prior to commencing lead related demolition work.

H. The Abatement Contractor must notify the Environmental Consultant at the completion of set up for each regulated area and containment, and shall not start demolition activities until the regulated area and containment have passed inspection by the Environmental Consultant.

3.6 Personnel Air Monitoring For Asbestos & Lead

A. The Abatement Contractor must provide daily employee personal air monitoring for asbestos exposure, required by Cal OSHA 8 CCR 1529 and Federal OSHA 29 CFR 1926.1101, unless a Negative Exposure Assessment (NEA) is submitted to, and approved by, the Environmental Consultant.

Abatement Contractor shall conduct representative breathing zone personal air monitoring of its employees (at a minimum, ¼ of employees) once each shift, for one 8-hour TWA & 30-minute short term exposure analysis. Personal air sampling shall be required during each and all work shifts involving the disturbance of ACM & ACCM, in all “Regulated Areas.”

Air monitoring laboratory analysis reports shall be submitted to the Owner’s Environmental Consultant within 2 days of the monitoring work. Any results in excess of the Permissible Exposure Limit (PEL) of (0.1 f/cc) shall be brought to the immediate attention of the Owner’s Environmental Consultant, and all work shall cease until cleared to proceed by the Owner’s Environmental Consultant.

B. The Abatement Contractor is responsible for providing daily OSHA compliance employee personal air monitoring for airborne lead exposure, per Cal/OSHA 8 CCR 1532.1, unless a Negative Exposure Assessment (NEA) is submitted to, and approved by, the Environmental Consultant.

Contractor shall conduct representative breathing zone personal air monitoring of its employees (at a minimum, ¼ of employees) once each shift, for both the lead Action Level (AL) and the lead Permissible Exposure Limit (PEL) analyses. Personal air sampling shall be required during each and all work shifts involving the disturbance of lead containing material.

Air monitoring laboratory analysis reports shall be submitted to the Owner's Environmental Consultant within 2 days of the monitoring work. Any results in excess of the lead PEL shall be brought to the immediate attention of the Owner's Environmental Consultant, and all work shall cease until cleared to proceed by the Owner's Environmental Consultant.

3.7 Post Abatement Clearance For Asbestos

A. Inform the Environmental Consultant upon completion of abatement work, and worksite clean-up, prior to removal of each containment and demobilization of the abatement crew. The Environmental Consultant will perform a visual clearance of the abatement area prior to air clearance sampling.

B. Abatement contractor shall maintain negative air conditions in all negative air containments, until the Environmental Consultant has cleared the contained area.

C. Post-asbestos abatement air clearance testing is required for all interior spaces, and shall be performed by the Project Environmental Consultant using either the AHERA TEM protocols or, where permitted by AHERA, PCM sampling.

D. In the event of a clearance failure, either visual or air sampling, the Abatement Contractor shall, at his expense, re-clean the inspected area and pay all re-testing costs.

3.8 Clearance For Lead Related Work

A. The Environmental Consultant will perform a visual clearance of each area where lead related demolition work is conducted.

B. Areas where lead containing materials are disturbed or abated must be free of any visible dust and/or debris for clearance to be achieved.

C. In the event of a visual clearance failure, the Abatement Contractor shall, at his expense, re-clean the inspected area prior to any additional visual clearance.

3.9 Equipment

A. Disposable protective clothing, including head, body, and foot coverings shall be furnished to all employees and visitors who will enter a "Regulated" work area.

B. Respirators shall be furnished to the abatement workers by Abatement Contractor. The respirators shall have been tested and approved by National Institute of Occupational Safety and Health (NIOSH) for use in asbestos and lead contaminated atmospheres.

C. ½ face air purifying respirators with P-100 filters will be required when disturbing non-friable ACM, ACCM, and lead containing material unless an adequate "negative exposure assessment" is submitted to, and approved by, the Project Environmental Consultant.

D. Full face PAPR respirators with P-100 filters will be required when disturbing friable ACM and/or performing Class I abatement work.

E. When necessary, additional safety equipment (e.g. hard hats meeting the requirements of ANSI Standard Z89.1-1981, eye protection meeting the requirements of ANSI Standard Z87.1-1979, safety shoes meeting the requirements of ANSI Standard Z41.1-1967, disposable gloves) shall be furnished to all workers and authorized visitors.

F. All HEPA negative air machines to be used on this Project must have passed a "challenge test," conducted by a certified third party, prior to use at this site.

G. Any HEPA negative air machines used on this Project, and vented to interior spaces, shall pass an "on-site challenge test," conducted by a certified third party, prior to use at this site. Tested machines must remain onsite for the duration of the project, if a machine is removed and returned, it must again pass an "on-site challenge test," prior to use.

H. All vacuums must be equipment with HEPA filtration. If power tools are used, provide power tools with HEPA assisted exhaust control.

I. All high-speed abrasive disc saws, or other high-speed abrasive equipment, must be equipped with a point-of-contact HEPA dust collection attachment.

J. All scaffolding and ladders must be used in conformance with Cal/OSHA Standards.

3.10 Materials

A. Deliver all materials in the original packages, containers, or bundles bearing the name of the manufacturer and brand name (where applicable).

B. Polyethylene sheeting utilized for drop sheets and containment barriers shall be a minimum of 6 mil. thickness, and be “Fire-retardant.”

C. Disposal bags for ACM and ACCM shall be of 6-mil. minimum polyethylene, and must have the required label if used for “friable” asbestos waste.

D. Spray adhesive for sealing polyethylene to polyethylene shall not contain methylene chloride compounds.

E. “Amended water” may be required for abatement of certain types of asbestos containing material.

4.0 ASBESTOS ABATEMENT PROCEDURES

4.1 General Abatement Procedures

A. All asbestos abatement must be conducted following all requirements of the Cal/OSHA Asbestos Regulation, 8 CCR 1529, and these specifications.

B. A “Containment” must be established for each work area, following all Cal/OSHA Asbestos Regulation (8 CCR 1529) requirements for the specific Cal/OSHA work type classification, and these specifications.

C. Negative air containments will be required for all interior asbestos abatement work.

D. Wet methods must be used for all asbestos abatement.

E. If high speed abrasive disc saws, or other high-speed abrasive equipment, are used, they must be equipped with a point-of-contact HEPA dust collection attachment.

F. All abated ACM and ACCM debris must be placed in double 6-mil polyethylene waste bags or double wrapped in leak-tight in 6-mil poly sheeting, Goosenecked, and secured with duct tape.

G. All asbestos debris in bags or wrappings must be visibly wet when sealed, and remain visibly wet throughout storage, transportation, and disposal at the waste facility.

H. All bags or wraps containing asbestos debris must be damp wiped clean just prior to removal from containments.

I. When abatement work is finished in any work area, clean up all debris, clean and remove waste bags, clean and remove tools and equipment, and thoroughly HEPA vacuum and wet wipe the entire containment.

J. Inform the Environmental Consultant upon completion of work. The Environmental Consultant will perform a visual clearance of the work area prior to demobilization of the Abatement Contractors work crew.

K. Encapsulating paints, enclosures, or any other application that will cover up and prevent a complete visual inspection may not be applied until after the Environmental Consultant has completed the visual inspection.

L. Post asbestos abatement air clearance sampling will be conducted for all interior abatement containments.

M. The Regulated Area and negative air conditions must be maintained until final air clearance has been achieved.

4.2 Abatement of ACM Sink Pan Undercoat

A. Cal/OSHA defined Class II abatement methods and containment are required.

B. Negative air containments will be required.

C. All “Project Requirements” (Section 2.0), “General Execution” requirements (Section 3.0), and “General Abatement Procedures” requirement (Section 4.1) of these specifications must be followed.

4.3 Abatement of RACM Sheet Flooring

A. Cal/OSHA defined Class II abatement methods and containment are required.

B. Negative air containments will be required.

C. All “Project Requirements” (Section 2.0), “General Execution” requirements (Section 3.0), and “General Abatement Procedures” requirement (Section 4.1) of these specifications must be followed.

4.4 Abatement of RACM Remnant Sheet Flooring Backing

A. Cal/OSHA defined Class II abatement methods and containment are required.

B. Negative air containments will be required.

C. All “Project Requirements” (Section 2.0), “General Execution” requirements (Section 3.0), and “General Abatement Procedures” requirement (Section 4.1) of these specifications must be followed.

5.0 LEAD DEMOLITION PROCEDURES

5.1 General Procedures For Lead Related Work

A. All lead related demolition work must be conducted following all requirements of the Cal/OSHA Lead in Construction Standard Title 8 CCR 1532.1, the California Code of Regulations Title 17 (17 CCR 35000-36100), and the EPA Lead Renovation, Repair, and Painting Rule (40 CFR Part 745).

B. A “Containment” must be established for each work area, following all requirements of the Cal/OSHA Lead in Construction Standard Title 8 CCR 1532.1, the California Code of Regulations Title 17 (17 CCR 35000-36100), and the EPA Lead Renovation, Repair, and Painting Rule (40 CFR Part 745).

C. Exterior lead related work will not be conducted if wind speeds are greater than 20 miles per hour, or wind causes dust or debris to escape the containment.

D. Prior to demolition of painted components, all loose or flacking paint must be stabilized, by scraping and encapsulating with a sufficient encapsulating paint.

E. For “Paint Stabilization,” all loose and flacking paint present must be stabilized. Paint stabilization requires scaping of the gross loose and flaking paint, and encapsulation with a sufficiently thick coat of encapsulating paint.

F. Mechanical ventilation equipped with HEPA filtration will be required for demolition of materials have a high probability of producing significant dust.

G. If high speed abrasive disc saws, or other high-speed abrasive equipment, are used, they must be equipped with a point-of-contact HEPA dust collection attachment.

H. All bags or wraps containing lead debris must be damp wiped clean just prior to removal from containments.

I. All concentrated paint chip debris must be properly sealed in approved lead waste containers.

J. The Abatement Contractor will assume any wastewater generated during the project contains some amount of lead, and is responsible for capturing, collecting, proper filtration, and proper disposal of all waste water.

K. When demolition work is finished in any work area, clean up all debris, clean and remove waste bags, clean and remove tools and equipment, and thoroughly HEPA vacuum and wet wipe the entire containment.

L. Inform the Environmental Consultant upon completion of work. The Environmental Consultant will perform a visual clearance of the work area prior to demobilization of the Abatement Contractors work crew.

M. Areas where lead containing materials are disturbed or abated must be free of any visible dust and/or debris for clearance to be achieved.

6.0 ASBESTOS AND LEAD WASTE

6.1 Hazardous Waste

A. Asbestos waste meeting the definition of "friable" is considered a California state "hazardous waste." The California code of Regulations, 22 CCR 66261- 66263 apply to hazardous waste generation, transportation, and disposal in California, which is enforced by the Department of Toxic Substance Control (DTSC).

B. Lead containing waste, meeting the state and federal definition of "hazardous wastes," is regulated in the state of California by the Department of Toxic Substance Control. Both the California code of Regulations, 22 CCR 66261- 66263, and the Resource Conservation and Recovery Act (RCRA) Federal Code of Regulations, 40 CFR 260-262, apply to generation, transportation, and disposal of hazardous waste in California.

C. The Abatement Contractor shall be responsible for compliance with all applicable federal, state, and local regulations regarding safe handling, transportation, and disposal of all "hazardous" and non-hazardous asbestos and lead waste generated by the Project.

D. A "Uniform Hazardous Waste Manifest" must accompany all shipments of hazardous waste generated by this Project. The hazardous waste manifest must be signed by the Owner's Project Manager prior to leaving the Project site. No individual other than the Owners Project Manager is authorized to sign the hazardous waste manifest, or release the hazardous waste to the transporter for shipment.

E. The Abatement Contractor is responsible for ensuring that the receiving waste facility returns to the Owner's Project Manager, a copy of the hazardous waste manifest signed by the accepting waste facility.

6.2 Transport of Hazardous And Non-Hazardous Waste

A. Abatement Contractor and Transporter shall defend, indemnify, and hold harmless, the Owner, the owners' representatives, and Project Environmental Consultant, from any and all claims, damages, losses, and expenses, including attorney's fees, arising out of or resulting from asbestos or lead spills during transport, other accidental transport events, any legal action due to negligence, or legal action due willful violation of regulatory requirements or laws.

B. The Abatement Contractor will be held financially responsible for any penalties assessed as a result of violations cited by regulatory agencies where the violations are a direct result of the Abatement Contractor's or Transporter's negligence, or willful violation of regulatory requirements or laws.

C. Transporters of hazardous friable asbestos waste, and hazardous lead waste, must be registered for hazardous waste transport with the Department of Toxic Substance Control (DTSC), and must be in compliance with all state and federal regulatory requirements for hazardous waste transporters.

D. The Abatement Contractor shall be responsible for the "transporter" compliance with all applicable DTSC requirements, all applicable Federal Resource Recovery and Conservation Act (RCRA) requirements, all applicable Department of Transportation (DOT) requirements, and all other state or local requirements, pertaining to the transport and disposal of hazardous and non-hazardous materials.

E. The Abatement Contractor must notify the Owners Project Manager and the Environmental Consultant when a load of hazardous waste is ready to be shipped. The notice must be given in advance, with sufficient time for the Owner's Project Manager and the Environmental Consultant to conduct an inspection, and accommodate the desired shipment schedule.

F. All hazardous waste loads must be inspected by the Environmental Consultant, and approved for shipment, prior to obtaining signature of the hazardous waste manifest by the Owner's Project Manager, and prior to being released for shipment.

G. Hazardous waste must be shipped separately from non-hazardous waste. If non-hazardous waste is loaded into the hazardous waste shipping container, the entire load must be classified as hazardous waste. The Abatement Contractor will be responsible for all additional costs associated with transport and disposal of the otherwise non-hazardous waste being transported and disposed of as hazardous waste.

H. Waste from other sites may not be combined with, or transported with, waste from this Project.

I. All hazardous and non-hazardous Asbestos Containing Material (ACM), and all Asbestos Containing Construction Material (ACCM) debris must be sealed in double 6-mil polyethylene waste bags, or double wrapped in leak-tight 6-mil poly sheeting, during transport from the Project site to the accepting waste facility.

J. The Environmental Consultant must be notified prior to shipment of all non-hazardous asbestos and lead waste, with sufficient time for the Environmental Consultant to conduct an inspection prior to the waste leaving the site.

K. All shipments of waste containing Asbestos Containing Construction Material (ACCM), regardless if the waste is classified as Construction Debris, must be accompanied by a shipping document that clearly identifies that the waste contains materials that contains asbestos. Copies of all shipping documents must be sent to the Owner's Project Manager.

L. Waste facilities must be informed, in writing, when a shipment of waste contains Asbestos Containing Construction Material (ACCM), regardless if the waste is classified as Construction Debris. Copies of all waste facility notification documents must be sent to the Owner's Project Manager.

M. The Abatement Contractor must obtain waste disposal tickets from the accepting waste facility, confirming proper disposal of all hazardous and non-hazardous asbestos or lead waste generated by the Project, and the Abatement Contractor must send copies of all waste disposal tickets to the Owner's Project Manager.

6.3 Disposal of Asbestos Waste

A. The Abatement Contractor is responsible for ensuring proper handling and disposal of all "Hazardous" and non-hazardous asbestos waste, in accordance with all applicable federal, state, and local regulations.

B. A "Regulated Area" must be established when loading asbestos waste into waste containers and transport vehicles, and must include the containment loadout area, the entire pathway to the waste container or transport vehicle, and the waste container or transport vehicle.

C. All waste containers used for storage of asbestos waste must have the proper OSHA asbestos warning signs.

D. All friable ACM waste must be handled, contained at the jobsite, transported, and disposed of as "hazardous friable asbestos waste."

E. Friable asbestos waste must be transported by a registered hazardous waste transporter, accompanied by a hazardous waste manifest, disposed of at an approved Class I landfill.

F. All non-friable ACM waste must be handled, contained at the jobsite, transported, and disposed of as “non-friable” asbestos waste.

G. Non-friable asbestos waste shall not be mixed with “friable” hazardous asbestos waste.

H. All ACCM waste, must be handled, contained at the jobsite, and transported as non-friable “ACM,” up to the point of actual disposal at an accepting waste facility.

I. ACCM can be disposed of as “General Construction Debris,” however, waste facilities must be informed, in writing, when a shipment of waste contains Asbestos Containing Construction Material (ACCM), regardless if the waste is classified as Construction Debris. Copies of all waste facility notification documents must be sent to the Owner’s Project Manager.

6.4 Disposal of Lead Waste

A. The Abatement Contractor and/or Demolition Contractor are responsible for ensuring proper handling and disposal of all “Hazardous” and non-hazardous lead containing waste, in accordance with all applicable federal, state, and local regulations.

B. The Abatement Contractor and/or Demolition Contractor are responsible for conducting lead waste characterization sampling for the lead containing waste generated by the Project.

C. All lead containing waste must be properly disposed of according to the waste classification determined by the lead waste characterization analysis results.

D. All painted metal components must be properly disposed of through a licensed recycling facility. Recycling facilities must be notified when recycle components have lead containing surface coatings.

E. All “Hazardous” lead waste must be transported by a registered hazardous waste transporter, accompanied by a hazardous waste manifest, and disposed of at an approved Class I landfill.

F. A “Regulated Area” must be established when loading lead containing waste into waste containers and transport vehicles, and must include the containment loadout area, the entire pathway to the waste container or transport vehicle, and the waste container or transport vehicle.

G. All waste containers used for storage of lead containing waste must have the proper OSHA lead warning signs.

-end of text-

APPENDIX A

Asbestos & Lead Survey Report

Brunelle & Clark Consulting, LLC

ASBESTOS SURVEY
& LEAD PAINT SAMPLING
FOR DEMOLITION OF
COMMERCIAL BUILDING
104 "W" STREET
EUREKA, CA

December 30, 2023

Project # 2308201

Prepared for:
Humboldt Transit Authority
Attn: Jim Wilson
Equipment & Facilities Manager
133 "V" Street
Eureka, CA 95501
(707) 443-0828

Prepared by:
Brunelle & Clark Consulting, LLC
P.O. Box 1138
Arcata, CA 95518
(707) 672-5345

ASBESTOS SURVEY
& LEAD PAINT SAMPLING
FOR DEMOLITION OF
COMMERCIAL BUILDING
104 "W" STREET
EUREKA, CA

Project # 2308201

Prepared for:
Humboldt Transit Authority
Attn: Jim Wilson
Equipment & Facilities Manager
133 "V" Street
Eureka, CA 95501
(707) 443-0828

Prepared by:
Brunelle & Clark Consulting, LLC
P.O. Box 1138
Arcata, CA 95518
(707) 672-5345

Zindar Brunelle
Certified Asbestos Consultant, #14-5295 (Exp. 10/15/24)
Certified Lead Inspector/Assessor, #LRC-00000482 (Exp. 09/02/24)
Certified Lead Supervisor, # LRC-00000481 (Exp. 09/02/24)

December 30, 2023

ASBESTOS SURVEY
& LEAD PAINT SAMPLING
FOR DEMOLITION OF
COMMERCIAL BUILDING
104 "W" STREET
EUREKA, CA

TABLE OF CONTENTS

Page

1.0 PURPOSE 1
2.0 EXECUTIVE SUMMARY 1
3.0 ASBESTOS SURVEY 2
TABLE 2 – ASBESTOS IDENTIFICATIONS & CLASSIFICATIONS 4
4.0 CONCLUSIONS & REGULATORY REQUIREMENTS FOR ASBESTOS 5
5.0 PAINT SAMPLING/LEAD ANALYSIS 7
6.0 CONCLUSIONS & REGULATORY REQUIREMENTS FOR LEAD 8
7.0 ASBESTOS REGULATIONS 9
8.0 LEAD REGULATIONS 11
9.0 DISCLAIMER 14

APPENDICES

Appendix A Figures

Appendix B Table 1, Summary of Asbestos Analytic Data

Table 3, XRF Paint Sampling Data

Asbestos Laboratory Report

XRF Paint Analyzer Data Sheet

Appendix C NESHAP Notification Package

Appendix D Consultant Certifications

ASBESTOS SURVEY
& LEAD PAINT SAMPLING
FOR DEMOLITION OF
COMMERCIAL BUILDING
104 "W" STREET
EUREKA, CA

1.0 PURPOSE

Between December 2 and December 10, 2023, this office conducted an asbestos survey and paint sampling for lead, for demolition of the commercial building located at 104 "W" Street, in Eureka, CA.

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

The asbestos survey was also conducted to identify asbestos containing materials (ACM) pursuant to the requirements of the California Health & Safety Code, and for compliance with Cal/OSHA regulations (8 CCR 1529) for worker protection.

To provide for compliance with: the Cal/OSHA Lead in Construction Standard Title 8, CCR Section 1532.1; the California Code of Regulations Title 17, CCR 35000-36100; and the EPA Lead Renovation, Repair, and Painting Rule, 40 CFR Part 745; representative paint sampling was conducted.

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

2.0 EXECUTIVE SUMMARY

The asbestos surveys includes all suspect materials on the interior, exterior, and roof of the subject building.

Paint sampling includes representative sampling of all building component types on the interior and exterior of the subject building.

Asbestos Survey

During the asbestos survey, 81 bulk samples were collected from suspect materials, and submitted for laboratory analysis of asbestos content.

Three (3) types of materials were found to contain asbestos.

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 Sampling

The paint sampling was conducted using a portable XRF (X-ray fluorescence) paint analyzer, which was used to measure lead content in paint coatings of 69 components on the interior and exterior of the project building.

Lead Based Paint (LBP) was identified on several building component types on the interior and exterior of the "original section" of the building.

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

3.0 ASBESTOS SURVEY

During this survey, a total of eighty-one (81) bulk samples were collected from suspect materials and submitted for the laboratory analysis of asbestos content. A description of all samples, and sample locations are contained in Table 1, Appendix B. All sample locations are indicated on Figures 1-4, Appendix A.

The bulk samples were submitted to an NVLAP accredited laboratory (AmeriSci Richmond, Midlothian, VA) for the analysis of asbestos content by Polarized Light Microscopy (PLM) by EPA 600/R-93/116. The sample Chain of Custody and Laboratory Report is contained in Appendix B. All the Asbestos analytic data are summarized in Table 1, Appendix B.

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

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

Asbestos was found present in three (3) types of building materials, which are listed by category below.

One (1) material is categorized as Asbestos Containing Material (ACM), and is listed below.

ACM

- **Sink pan undercoat, black**

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

RACM

- **Sheet flooring, tan**
- **Remnant sheet flooring backing, gray**

The project ACM and/or ACCM are listed in Table 2 below, including location, asbestos content, the agency categorization, abatement requirements, and waste categorization. The locations of the project ACM/ACCM are shown on Figure 8, Appendix A.

TABLE 2
ASBESTOS IDENTIFICATIONS & CLASSIFICATIONS

104 "W" Street
Eureka, CA

MATERIAL	LOCATION	QUANTITY	ASBESTOS CONTENT & TYPE	OSHA CLASSIFICATION	NESHAP CATEGORY	WASTE DISPOSAL CLASSIFICATION
Sink pan undercoat, black	**R5,** on the underside of the metal sink pan in the kitchen (See Fig. 8)	Approx. 8 SF	2% CH	ACM, Class II abatement required where disturbed	Category I Non-Friable ACM Not RACM*	Non-friable asbestos waste
Sheet flooring, tan Note: the underlaying wood is contaminated	**R1, R4 & R5,** under carpet in R1 & R4, and under sheet flooring & plywood in R5, all on wood (See Fig. 8)	Approx. 600 SF	25% CH	ACM, Class II abatement required where disturbed	"Friable" RACM	"Friable" asbestos waste
Remnant sheet flooring backing, gray Note: the wood base of the cabinet is contaminated	**WRR,** on the base of the cabinet in the WRR, under vinyl baseboard & baseboard mastic (See Fig. 8)	Approx. 5 SF	25% CH	ACM, Class II abatement required where disturbed	"Friable" RACM	"Friable" asbestos waste

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

ACM = Asbestos Containing Materials, containing >1% asbestos

CH = Chrysotile Asbestos

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

PACM = Presumed ACM

RACM = Regulated ACM under NESHAP regulations

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

SF = Square Feet

4.0 CONCLUSIONS AND REGULATORY REQUIREMENTS FOR ASBESTOS

Conclusions

Three (3) types of materials were found to contain asbestos.

All asbestos containing material must be abated from the building, prior to demolition of the building.

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 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.

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 identified during this survey are encountered by the contractor during the project, the disturbance of the discovered materials must cease until the materials are sampled for asbestos.** Un-sampled materials must be presumed to contain asbestos until sampled and proven otherwise.

Regulatory Requirements

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

In Humboldt, Del Norte, and Trinity counties, the NESHAP regulations concerning renovation and/or demolition work is enforced by the North Coast Unified Air Quality Management District (NCUAQMD) located in Eureka, California. For questions regarding regulatory compliance, please contact the NCUAQMD at 707-443-3093.

Friable NESHAP Regulated Asbestos Containing Material (RACM) was identified during this survey. **A NESHAP Notification for "abatement" must be filed with the North Coast Unified Air Quality Management District (NCUAQMD).**

This is a demolition project, **and a NESHAP Notification for "demolition" must be filed with the North Coast Unified Air Quality Management District (NCUAQMD).**

When a NESHAP Notifications is required, **it must be submitted to the NCUAQMD, at least 10 days prior to conducting asbestos abatement and/or demolition work.** The fillable

NESHAP Notification Form and filing instructions can be found in Appendix C of this report, and on the NCUAQMD website at:

https://www.ncuaqmd.org/asbestos-neshap-regulations

The Department of Toxic Substance Control (DTSC) defines "friable" asbestos waste as "hazardous" waste.

Friable asbestos material was identified during this survey, and temporary hazardous waste generator number must be obtained from the DTSC. The Temporary EPA Id number can be obtained on the DTSC website at:

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

Shipping of friable asbestos waste will require the use of a licensed "hazardous waste hauler," and the friable asbestos must be disposed of at an accepting Class I waste facility, as "hazardous asbestos waste."

Cal/OSHA regulates any disturbance or abatement of any material containing any amount of asbestos.

All asbestos abatement or disturbance must be performed by a registered asbestos abatement contractor, using properly trained and certified asbestos abatement workers.

All asbestos abatement or disturbance must be conducted following Cal/OSHA defined asbestos abatement methods.

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

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

Project ACM & ACCM

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

ACM Sink Pan Undercoat: Any abatement or disturbance of the ACM sink pan undercoat identified in this report must be done by a licensed asbestos abatement contractor using Class II methods, with disposal as "non-friable" asbestos waste.

RACM Sheet Flooring: Any abatement or disturbance of the asbestos containing sheet flooring identified in this report must be done by a licensed asbestos abatement contractor using Class II asbestos abatement methods at a minimum. It is recommended herein to augment the standard Class II abatement with negative air containment of the abatement area. The abated material must be disposed of as "friable" asbestos waste. This will require the use of a licensed "hazardous" waste hauler.

RACM Remnant Sheet Flooring Backing: Any abatement or disturbance of the asbestos containing remnant sheet flooring backing identified in this report must be done by a licensed asbestos abatement contractor using Class II asbestos abatement methods at a minimum. It is recommended herein to augment the standard Class II abatement with negative air containment of the abatement area. The abated material must be disposed of as "friable" asbestos waste. This will require the use of a licensed "hazardous" waste hauler.

5.0 PAINT SAMPLING/LEAD ANALYSIS

The paint sampling for lead includes representative sampling of building component types on the interior and exterior of the project building.

XRF Paint Sampling

Sampling for lead in paint was conducted using a portable Heuresis Corporation, Pb200i XRF (X-ray fluorescence) Lead Paint Analyzer, which was used to measure lead content in paint coatings of sixty-nine (69) building components.

A description of sampled components, sample locations, and XRF data is contained in Table 3, Appendix B. The XRF Paint Analyzer Data sheet is also contained in Appendix B. All XRF sample locations are indicated on Figures 5-7, Appendix A.

Paint coatings on building components are placed in one of three categories, based on the lead content identified by XRF sampling. The three categories are defined by the amount of lead contained in a paint coating, and are listed below.

- **Lead Based Paint (LBP)** is defined as paint with a lead content at or above 1.0 mg/cm^2.
- **Lead Containing Surface Coatings (LCSC)** are paints with quantifiable lead content less than 1.0 mg/cm^2.
- **Trace Lead Content or Lead Free (TR/LF)** are paints with trace unquantifiable lead content or no lead content.

By XRF analyses:

- Six (6) sampled components were identified to have LBP.
- Six (6) sampled components were found to have quantifiable lead content less than LBP.
- Fifty-seven (57) sampled components were found to have trace unquantifiable lead content or are lead free.

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

Lead Based Paint (LBP)

- **Window trim:** all "interior" window trim components in the "Original Building Section."
- **Window & door trim:** all "exterior" window & door trim on the "Original Building Section."
- **Porch ceiling planks & trim:** wood ceiling planks and associated trim of the covered porch on the front of the "Original Building Section."
- **Wood lap siding:** "original wood lap siding," located behind the newer wood shingle siding on the "Original Building Section."

Note: the "Original Building Section" includes the east half of the building, and is shown on the Project Figures in Appendix A.

All other sampled component types were found to contain trace to negative quantities of lead. See Table 3, Appendix B for all sampling data.

6.0 CONCLUSIONS & REGULATORY REQUIREMENTS FOR LEAD

Lead In Paint

Lead Based Paint (LBP) was identified on several building component types on the interior and exterior of the "Original Building Section," which includes the east half of the building.

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

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

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

Cal/OSHA requires exposure assessment personal air sampling, when paint with any amount of lead is disturbed by Cal/OSHA defined "trigger tasks," or any lead related construction work is conducted 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.

Lead waste characterization is required to determine the waste classification for all lead containing waste generated during the demolition project, and the demolition waste must be disposed of according to state and federal waste requirements.

Note: this office can provide lead waste characterization. If you have questions about the lead waste characterization requirements, please contact this office at 707-672-5345.

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-

APPENDIX A

Figures

BRUNELLE & CLARK CONSULTING, LLC
P. O. Box 1138
Arcata, California 95518
2308201 12/30/23

ASBESTOS SAMPLE LOCATIONS

(Asbestos Samples: 1-12, 25-55)

●— # Asbestos Sample Locations
(Prefixed 104- #, with + or − designation)
(+) is positive for Asbestos, (−) is negative

1st Floor
104 "W" St.
Eureka, CA

FIG. 1

BRUNELLE & CLARK CONSULTING, LLC
P. O. Box 1138
Arcata, California 95518
2308201 12/30/23

ASBESTOS SAMPLE LOCATIONS

(Asbestos Samples: 13-24, 56, 57)

Asbestos Sample Locations
(Prefixed 104- #, with + or – designation)
(+) is positive for Asbestos, (–) is negative

2nd Floor
104 "W" St.
Eureka, CA

FIG. 2

BRUNELLE & CLARK CONSULTING, LLC
P. O. Box 1138
Arcata, California 95518
2308201 12/30/23

ASBESTOS SAMPLE LOCATIONS

(Asbestos Samples: 58-72)

● # Asbestos Sample Locations
(Prefixed 104- #, with + or − designation)
(+) is positive for Asbestos, (−) is negative

Exterior
104 "W" St.
Eureka, CA

FIG. 3

BRUNELLE & CLARK CONSULTING, LLC
P. O. Box 1138
Arcata, California 95518
2308201 12/30/23

ASBESTOS SAMPLE LOCATIONS

(Asbestos Samples: 73-81)

Asbestos Sample Locations
(Prefixed 104- #, with + or – designation)
(+) is positive for Asbestos, (–) is negative

Roof
104 "W" St.
Eureka, CA

FIG. 4

BRUNELLE & CLARK CONSULTING, LLC
P. O. Box 1138
Arcata, California 95518
2308201 12/30/23

XRF SAMPLE LOCATIONS

(Samples: 14-51)

● # XRF Sample Location

1st Floor
104 "W" St.
Eureka, CA

FIG. 5

BRUNELLE & CLARK CONSULTING, LLC
P. O. Box 1138
Arcata, California 95518
2308201 12/30/23

XRF SAMPLE LOCATIONS

(Samples: 4-13)

XRF Sample Location

2nd Floor
104 "W" St.
Eureka, CA

FIG. 6

BRUNELLE & CLARK CONSULTING, LLC
P. O. Box 1138
Arcata, California 95518
2308201 12/30/23

XRF SAMPLE LOCATIONS

(Samples: 4B-24B)

XRF Sample Location

Exterior
104 "W" St.
Eureka, CA

FIG. 7

BRUNELLE & CLARK CONSULTING, LLC
P. O. Box 1138
Arcata, California 95518
2308201 12/30/23

ASBESTOS LOCATIONS

- ACM Sink pan undercoat, black
- RACM Sheet flooring, tan
- RACM Remnant sheet flooring backing, gray

Note: see Table 2 for material & location details

1st Floor
104 "W" St.
Eureka, CA

FIG. 8

APPENDIX B

Tables & Laboratory Reports

TABLE 1
SUMMARY OF ASBESTOS ANALYTIC DATA

104 "W" Street
Eureka, CA

Sample Number	Sample Description (each layer)	Location	Asbestos % and Type	Friable vs. Non-Friable	Comments
104- 1	Joint compound	R1, wall	NAD	NF	
2nd layer	…. gypsum board	‘’	NAD	NF	
104- 2	Joint compound	R3, wall	NAD	NF	
2nd layer	…. gypsum board	,,	NAD	NF	
104- 3	Joint compound	R4, ceiling	NAD	NF	
2nd layer	…. gypsum board	‘’	NAD	NF	
104- 4	Joint compound	R1, wall	NAD	NF	
2nd layer	…. gypsum board	‘’	NAD	NF	
104- 5	Joint compound	R8, wall	NAD	NF	
2nd layer	…. gypsum board	‘’	NAD	NF	
104- 6	Joint compound	R1, ceiling	NAD	NF	
2nd layer	…. gypsum board	‘’	NAD	NF	
104- 7	Joint compound	R2, wall	NAD	NF	
2nd layer	…. gypsum board	‘’	NAD	NF	
104- 8	Joint compound	R5, ceiling	NAD	NF	
2nd layer	…. gypsum board	‘’	NAD	NF	
104- 9	Joint compound	WRR, wall	NAD	NF	
2nd layer	…. gypsum board	‘’	NAD	NF	
104- 10	Joint compound	R7, wall	NAD	NF	
2nd layer	…. gypsum board	‘’	NAD	NF	
104- 11	Joint compound	R6, wall	NAD	NF	
2nd layer	…. gypsum board	‘’	NAD	NF	
104- 12	Joint compound	R1, wall	NAD	NF	
2nd layer	…. gypsum board	‘’	NAD	NF	
104- 13	Joint compound	R9, ceiling	NAD	NF	
2nd layer	…. gypsum board	‘’	NAD	NF	
104- 14	Joint compound	R10, wall	NAD	NF	

TABLE 1
SUMMARY OF ASBESTOS ANALYTIC DATA

104 "W" Street
Eureka, CA

Sample Number	Sample Description (each layer)	Location	Asbestos % and Type	Friable vs. Non-Friable	Comments
2nd layer	…. gypsum board	‘’	NAD	NF	
104- 15	Joint compound	R12, wall	NAD	NF	
2nd layer	…. gypsum board	‘’	NAD	NF	
104- 16	Joint compound	R12, wall	NAD	NF	
2nd layer	…. gypsum board	‘’	NAD	NF	
104- 17	Joint compound	R11, wall	NAD	NF	
2nd layer	…. gypsum board	‘’	NAD	NF	
104- 18	Joint compound	R9, wall	NAD	NF	
2nd layer	…. gypsum board	‘’	NAD	NF	
104- 19	Drywall texture, skip trowel (Type 1)	R11, wall	NAD	NF	
104- 20	Drywall texture, skip trowel (Type 1)	R12, wall	NAD	NF	
104- 21	Drywall texture, skip trowel (Type 1)	R12, wall	NAD	NF	
104- 22	Drywall texture, skip trowel (Type 2)	R10, wall	NAD	NF	
104- 23	Drywall texture, skip trowel (Type 2)	R12, wall	NAD	NF	
104- 24	Drywall texture, skip trowel (Type 2)	R9, wall	NAD	NF	
104- 25	Drywall texture, skip trowel (Type 2)	WRR, wall	NAD	NF	
104- 26	Drywall texture, skip trowel (Type 2)	R6, wall	NAD	NF	
104- 27	Drywall texture, skip trowel (Type 2)	R7, wall	NAD	NF	

TABLE 1
SUMMARY OF ASBESTOS ANALYTIC DATA

104 "W" Street
Eureka, CA

Sample Number	Sample Description (each layer)	Location	Asbestos % and Type	Friable vs. Non-Friable	Comments
104- 28	Drywall texture, skip trowel (Type 2)	R1, wall	NAD	NF	
104- 29	Drywall texture, skip trowel (Type 3)	R1, wall	NAD	NF	
104- 30	Drywall texture, skip trowel (Type 3)	R5, ceiling	NAD	NF	
104- 31	Drywall texture, skip trowel (Type 3)	R8, wall	NAD	NF	
104- 32	Drywall texture, skip trowel (Type 3)	R2, wall	NAD	NF	
104- 33	Drywall texture, skip trowel (Type 3)	R3, wall	NAD	NF	
104- 34	Drywall texture, skip trowel (Type 3)	R4, wall	NAD	NF	
104- 35	**Sink pan undercoat, black**	**R5, underside of sink pan**	**2% CH**	**NF**	
104- 36	Sheet flooring, brown	R2, floor, under laminate flooring	NAD	NF	
104- 37	Sheet flooring, brown	R2, floor, under laminate flooring	NAD	NF	
104- 38	Sheet flooring, brown	R3, floor, under laminate flooring	NAD	NF	
104- 39	Sheet flooring, brown	R3, floor, under laminate flooring	NAD	NF	
104- 40	**Sheet flooring, tan**	**R4, floor, under carpet**	**20% CH**	**F**	**Friable due to paper backing**
104- 41	**Sheet flooring, tan**	**R4, floor, under carpet**	**PACM**	**F**	**NA/PS**
104- 42	Tarpaper, black	R4, floor, on sub-floor	NAD	NF	

TABLE 1
SUMMARY OF ASBESTOS ANALYTIC DATA

104 "W" Street
Eureka, CA

Sample Number	Sample Description (each layer)	Location	Asbestos % and Type	Friable vs. Non-Friable	Comments
104- 43	Paper, brown	R8, floor, under laminate & plywood	NAD	NF	
104- 44	**Sheet flooring, tan**	**R1, floor, under carpet**	**25% CH**	**F**	**Friable due to paper backing**
104- 45	**Sheet flooring, tan**	**R5, floor, under sheet flooring & plywood**	**PACM**	**F**	**NA/PS**
104- 46	Tarpaper, black	R1, floor, on sub-floor	NAD	NF	
104- 47	Tarpaper, black	R5, floor, on sub-floor	NAD	NF	
104- 48	**Sheet flooring, tan**	**R1, floor, under carpet**	**25% CH**	**F**	**Friable due to paper backing**
104- 49	Tarpaper, brown	R1, floor, on sub-floor	NAD	NF	
104- 50	Tarpaper, brown	R6, floor, on sub-floor	NAD	NF	
104- 51	**Sheet flooring backing, gray**	**WRR, on cabinet base & vinyl baseboard**	**25% CH**	**F**	**Friable due to paper backing**
104- 52	Baseboard mastic, tan	WRR, vinyl baseboard	NAD	NF	
104- 53	Baseboard mastic, tan	R5, vinyl baseboard	NAD	NF	
104- 54	Sheet flooring, tan with speckles	WRR, floor, only layer	NAD	NF	
104- 55	Sheet flooring, tan with speckles	R5, floor, top layer	NAD	NF	
104- 56	Sheet flooring, tan with speckles	R9, floor, only layer	NAD	NF	
104- 57	Baseboard mastic, tan	R9, vinyl baseboard	NAD	NF	
104- 58	Tarpaper, black	Exterior, siding	NAD	NF	
104- 59	Concrete, gray	Exterior, foundation wall	NAD	NF	
104- 60	Concrete, gray	Exterior, foundation wall	NAD	NF	
104- 61	Brick, red	Exterior, front porch	NAD	NF	

TABLE 1
SUMMARY OF ASBESTOS ANALYTIC DATA

104 "W" Street
Eureka, CA

Sample Number	Sample Description (each layer)	Location	Asbestos % and Type	Friable vs. Non-Friable	Comments
104- 62	Brick, red	Exterior, front porch	NAD	NF	
104- 63	Mortar, gray	Exterior, front porch	NAD	NF	
104- 64	Mortar, gray	Exterior, front porch	NAD	NF	
104- 65	Mortar, gray	Exterior, front porch	NAD	NF	
104- 66	Tarpaper, black	Exterior, siding	NAD	NF	
104- 67	Tarpaper, black	Exterior, siding	NAD	NF	
104- 68	Concrete, gray	Exterior, foundation wall	NAD	NF	
104- 69	Concrete, gray	Exterior, foundation wall	NAD	NF	
104- 70	Cinderblock. gray	Exterior, front foundation wall	NAD	NF	
104- 71	Mortar, gray	Exterior, front foundation wall	NAD	NF	
104- 72	Mortar, gray	Exterior, front foundation wall	NAD	NF	
104- 73	Roofing, gray comp. shingle	Roof, main membrane, top layer	NAD	NF	
104- 74	Roofing, gray comp. shingle	Roof, main membrane, top layer	NAD	NF	
104- 75	Roofing, gray comp. shingle	Roof, main membrane, top layer	NAD	NF	
104- 76	Roofing, gray comp. shingle	Roof, main membrane, middle layer	NAD	NF	
104- 77	Roofing, gray comp. shingle	Roof, main membrane, middle layer	NAD	NF	
104- 78	Roofing, gray comp. shingle	Roof, main membrane, middle layer	NAD	NF	

TABLE 1
SUMMARY OF ASBESTOS ANALYTIC DATA

104 "W" Street
Eureka, CA

Sample Number	Sample Description (each layer)	Location	Asbestos % and Type	Friable vs. Non-Friable	Comments
104- 79	Tarpaper, black	Roof, main membrane, bottom layer	NAD	NF	
104- 80	Tarpaper, black	Roof, main membrane, bottom layer	NAD	NF	
104- 81	Tarpaper, black	Roof, main membrane, bottom layer	NAD	NF	

Bold Type = materials found to contain asbestos

CH = Chrysotile Asbestos

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

NAD = No Asbestos Detected

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

NF = Non-friable

PACM = Presumed ACM

<1% = less than 1% asbestos content

Note: Some samples had multiple layers analyzed separately

TABLE 3
XRF PAINT SAMPLING DATA

104 "W" Street
Eureka, CA

XRF Lead Paint Analyzer:

Heuresis Corp.
Model: Pb200i
Serial# 1566

Calibration:

Standard Reference Material: lead content of 1.04 mg/cm^2 ±0.0643
Response Verification Check Range: 0.8 mg/cm^2 to 1.2 mg/cm^2
Note: for Performance Characteristic Sheet (PCS) compliance, the average of three calibration readings must fall within the "Response Verification Check Range."

Reading #	Sample Location	Component Description	Lead Concentration (mg/cm^2)	Paint Classification	Surface Coating Material	Color	Substrate
1	Calibration	Standard Reference Material	1.0	--	--	--	--
2	Calibration	Standard Reference Material	1.0	--	--	--	--
3	Calibration	Standard Reference Material	1.1	--	--	--	--
4	R10	Wall	0.1	TR/LF	Paint	Lt. green	Drywall
5	R10	Window trim	-0.2	TR/LF	Paint	White	Wood
6	R10	Door trim	-0.2	TR/LF	Paint	White	Wood
7	R10	Door	-0.1	TR/LF	Paint	White	Wood

LBP = Lead Based Paint (lead content ≥1.0 mg/cm^2)
LCSC = Lead Containing Surface Coating (quantifiable lead content that is <1.0 mg/cm^2)
TR/LF = Trace Lead Content Or Lead Free (trace unquantifiable lead content or lead free)

TABLE 3
XRF PAINT SAMPLING DATA

104 "W" Street
Eureka, CA

Reading #	Sample Location	Component Description	Lead Concentration (mg/cm^2)	Paint Classification	Surface Coating Material	Color	Substrate
8	R11	Wall	0.2	TR/LF	Paint	Tan	Drywall
9	R11	Window sill	-0.1	TR/LF	Paint	White	Wood
10	R11	Baseboard	0	TR/LF	Paint	Tan	Wood
11	R12	Door jamb	-0.2	TR/LF	Paint	White	Wood
12	R9	Railing	-0.1	TR/LF	Paint	White	Wood
13	R9	Cabinet	-0.2	TR/LF	Paint	White	Wood
14	R1	Post	-0.1	TR/LF	Paint	White	Wood
15	R1	Wall	0	TR/LF	Paint	Gray	Drywall
16	R7	Wall	0.1	TR/LF	Paint	Blue	Drywall
17	R7	Window trim	-0.1	TR/LF	Paint	White	Wood
18	R7	Baseboard	0.1	TR/LF	Paint	Blue	Wood
19	R6	Wall	0.1	TR/LF	Paint	White	Drywall
20	R6	Door trim	-0.1	TR/LF	Paint	White	Wood
21	R6	Door	-0.1	TR/LF	Paint	White	Wood
22	WRR	Sink	-0.1	TR/LF	Glaze	White	Ceramic

LBP = Lead Based Paint (lead content $\geq$1.0 mg/cm^2)
LCSC = Lead Containing Surface Coating (quantifiable lead content that is <1.0 mg/cm^2)
TR/LF = Trace Lead Content Or Lead Free (trace unquantifiable lead content or lead free)

TABLE 3
XRF PAINT SAMPLING DATA

104 "W" Street
Eureka, CA

Reading #	Sample Location	Component Description	Lead Concentration (mg/cm^2)	Paint Classification	Surface Coating Material	Color	Substrate
23	WRR	Toilet	-0.2	TR/LF	Glaze	White	Ceramic
24	WRR	Window sill	-0.1	TR/LF	Paint	White	Wood
25	MRR	Cabinet door	0.1	TR/LF	Paint	White	Wood
26	MRR	Sink	-0.1	TR/LF	Glaze	White	Ceramic
27	MRR	Toilet	-0.2	TR/LF	Glaze	White	Ceramic
28	MRR	Door jamb	-0.4	TR/LF	Paint	White	Wood
29	R8	Wall	0.1	TR/LF	Paint	Lt. green	Drywall
30	R8	Window trim	0.8	LCSC	Paint	White	Wood
31	R8	Window sill	0.4	TR/LF	Paint	White	Wood
32	R8	Door trim	0	TR/LF	Paint	White	Wood
33	R8	Door	0	TR/LF	Paint	White	Wood
34	R5	Door trim	-0.1	TR/LF	Paint	White	Wood
35	R5	Window sill	-0.1	TR/LF	Paint	White	Wood
36	R5	Wall	0.1	TR/LF	Paint	Gray	Drywall
37	R5	Cabinet top	0.3	TR/LF	Paint	White	Wood

LBP = Lead Based Paint (lead content ≥1.0 mg/cm^2)
LCSC = Lead Containing Surface Coating (quantifiable lead content that is <1.0 mg/cm^2)
TR/LF = Trace Lead Content Or Lead Free (trace unquantifiable lead content or lead free)

TABLE 3
XRF PAINT SAMPLING DATA

104 "W" Street
Eureka, CA

Reading #	Sample Location	Component Description	Lead Concentration (mg/cm^2)	Paint Classification	Surface Coating Material	Color	Substrate
38	R5	Cabinet door	0.3	TR/LF	Paint	White	Wood
39	R1	Door trim	0	TR/LF	Paint	White	Wood
40	R2	Wall	0.1	TR/LF	Paint	Gray	Drywall
41	**R2**	**Window trim**	**2.3**	**LBP**	**Paint**	**White**	**Wood**
42	**R2**	**Window sill**	**10.9**	**LBP**	**Paint**	**White**	**Wood**
43	R2	Door trim	-0.1	TR/LF	Paint	White	Wood
44	R2	Baseboard	0	TR/LF	Paint	White	Wood
45	R3	Window sill	0.5	LCSC	Paint	White	Wood
46	R3	Window trim	0.4	TR/LF	Paint	White	Wood
47	R3	Door trim	-0.2	TR/LF	Paint	White	Wood
48	R3	Wall	0.1	TR/LF	Paint	Lt. green	Drywall
49	R3	Baseboard	0.1	TR/LF	Paint	Lt. green	Wood
50	R4	Door	0.1	TR/LF	Paint	White	Wood
51	R4	Window trim	0	TR/LF	Paint	White	Wood

LBP = Lead Based Paint (lead content $\geq$1.0 mg/cm^2)
LCSC = Lead Containing Surface Coating (quantifiable lead content that is <1.0 mg/cm^2)
TR/LF = Trace Lead Content Or Lead Free (trace unquantifiable lead content or lead free)

TABLE 3
XRF PAINT SAMPLING DATA

104 "W" Street
Eureka, CA

Reading #	Sample Location	Component Description	Lead Concentration (mg/cm^2)	Paint Classification	Surface Coating Material	Color	Substrate
52	Calibration	Standard Reference Material	1.0	--	--	--	--
53	Calibration	Standard Reference Material	1.1	--	--	--	--
54	Calibration	Standard Reference Material	1.0	--	--	--	--
1B	Calibration	Standard Reference Material	1.0	--	--	--	--
2B	Calibration	Standard Reference Material	1.0	--	--	--	--
3B	Calibration	Standard Reference Material	1.0	--	--	--	--
4B	Exterior	Shingle siding	-0.3	TR/LF	Stain	Clear	Wood
5B	Exterior	Window trim	0	TR/LF	Paint	Green	Wood
6B	Exterior	Siding skirt board	-0.1	TR/LF	Paint	Green	Wood
7B	Exterior	Door trim	-0.1	TR/LF	Paint	Green	Wood
8B	Exterior	Window sill	0	TR/LF	Paint	Green	Wood
9B	Exterior	Siding skirt board	0	TR/LF	Paint	Green	Wood
10B	Exterior	Window trim	0	TR/LF	Paint	Green	Wood

LBP = Lead Based Paint (lead content $\geq$1.0 mg/cm^2)
LCSC = Lead Containing Surface Coating (quantifiable lead content that is <1.0 mg/cm^2)
TR/LF = Trace Lead Content Or Lead Free (trace unquantifiable lead content or lead free)

TABLE 3
XRF PAINT SAMPLING DATA

104 "W" Street
Eureka, CA

Reading #	Sample Location	Component Description	Lead Concentration (mg/cm^2)	Paint Classification	Surface Coating Material	Color	Substrate
11B	Exterior	Door trim	0.7	LCSC	Paint	Green	Wood
12B	Exterior	Window trim	-0.1	TR/LF	Paint	Green	Wood
13B	Exterior	Shingle siding	0.6 Note: the XRF is picking up lead content from the inner wood lap siding layer	LCSC	Stain/Paint	Clear	Wood shingle over wood lap siding with LBP
14B	Exterior	Shingle siding	0.5 Note: the XRF is picking up lead content from the inner wood lap siding layer	LCSC	Stain/Paint	Clear	Wood shingle over wood lap siding with LBP
15B	**Exterior, covered porch**	**Ceiling plank**	**9.2**	**LBP**	**Paint**	**White**	**Wood**
16B	Exterior, covered porch	Post	-0.3	TR/LF	Paint	Green	Wood
17B	Exterior, covered porch	Metal fence	0.2	TR/LF	Paint	Black	Metal
18B	Exterior, covered porch	Handrail	0.1	TR/LF	Paint	Black	Metal
19B	**Exterior**	**Window sill**	**6.9**	**LBP**	**Paint**	**Green**	**Wood**

LBP = Lead Based Paint (lead content ≥1.0 mg/cm^2)
LCSC = Lead Containing Surface Coating (quantifiable lead content that is <1.0 mg/cm^2)
TR/LF = Trace Lead Content Or Lead Free (trace unquantifiable lead content or lead free)

TABLE 3
XRF PAINT SAMPLING DATA

104 "W" Street
Eureka, CA

Reading #	Sample Location	Component Description	Lead Concentration (mg/cm^2)	Paint Classification	Surface Coating Material	Color	Substrate
20B	Exterior	Siding skirt board	-0.1	TR/LF	Paint	Green	Wood
21B	Exterior	Window trim	-0.1	TR/LF	Paint	Green	Wood
22B	**Exterior**	**Shingle siding**	**1.2** **Note: the XRF is picking up lead content from the inner wood lap siding layer**	**LBP**	**Stain/Paint**	**Clear**	**Wood shingle over wood lap siding with LBP**
23B	**Exterior**	**Window sill**	**7.0**	**LBP**	**Paint**	**Green**	**Wood**
24B	Exterior	Shingle siding	0.8 Note: the XRF is picking up lead content from the inner wood lap siding layer	LCSC	Stain/Paint	Clear	Wood shingle over wood lap siding with LBP
25B	Calibration	Standard Reference Material	1.1	--	--	--	--
26B	Calibration	Standard Reference Material	1.1	--	--	--	--
27B	Calibration	Standard Reference Material	0.9	--	--	--	--

LBP = Lead Based Paint (lead content ≥1.0 mg/cm^2)
LCSC = Lead Containing Surface Coating (quantifiable lead content that is <1.0 mg/cm^2)
TR/LF = Trace Lead Content Or Lead Free (trace unquantifiable lead content or lead free)

AmeriSci Richmond
13635 GENITO ROAD
MIDLOTHIAN, VIRGINIA 23112
TEL: (804) 763-1200 • FAX: (804) 763-1800

PLM Bulk Asbestos Report

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

Arcata, CA 95518

Date Received 12/05/23
Date Examined 12/11/23

AmeriSci Job # 123121112
P.O. #

RE: 2308201; 104 "W" Street; Eureka, CA

Client No. / HGA	Lab No.	Asbestos Present	Total % Asbestos
104-1	123121112-01.1	***No***	NAD (by CVES) by Eric H. Ahles on 12/11/23
Location: JC/GB; R2/Wall			
Analyst Description: White, Heterogeneous, Non-Fibrous, Joint Compound			
Asbestos Types:			
Other Material: Non-fibrous 100%			
104-1	123121112-01.2	***No***	NAD (by CVES) by Eric H. Ahles on 12/11/23
Location: JC/GB; R2/Wall			
Analyst Description: White, Heterogeneous, Non-Fibrous, Gypsum Board			
Asbestos Types:			
Other Material: Cellulose 2.0%, Non-fibrous 98%			
104-2	123121112-02.1	***No***	NAD (by CVES) by Eric H. Ahles on 12/11/23
Location: JC/GB; R3/Wall			
Analyst Description: White, Heterogeneous, Non-Fibrous, Joint Compound			
Asbestos Types:			
Other Material: Non-fibrous 100%			
104-2	123121112-02.2	***No***	NAD (by CVES) by Eric H. Ahles on 12/11/23
Location: JC/GB; R3/Wall			
Analyst Description: White, Heterogeneous, Non-Fibrous, Gypsum Board			
Asbestos Types:			
Other Material: Cellulose 2.0%, Non-fibrous 98%			
104-3	123121112-03.1	***No***	NAD (by CVES) by Eric H. Ahles on 12/11/23
Location: JC/GB; R4/Ceiling			
Analyst Description: White, Heterogeneous, Non-Fibrous, Joint Compound			
Asbestos Types:			
Other Material: Non-fibrous 100%			

See Reporting notes on last page

PLM Bulk Asbestos Report

2308201; 104 "W" Street; Eureka, CA

Client No. / HGA	Lab No.	Asbestos Present	Total % Asbestos
104-3	123121112-03.2	***No***	NAD
Location: JC/GB; R4/Ceiling			(by CVES) by Eric H. Ahles on 12/11/23
Analyst Description: Gray, Heterogeneous, Non-Fibrous, Gypsum Board **Asbestos Types:** **Other Material:** Cellulose 2.0%, Non-fibrous 98%			
104-4	123121112-04.1	***No***	NAD
Location: JC/GB; R1/Wall			(by CVES) by Eric H. Ahles on 12/11/23
Analyst Description: White, Heterogeneous, Non-Fibrous, Joint Compound **Asbestos Types:** **Other Material:** Non-fibrous 100%			
104-4	123121112-04.2	***No***	NAD
Location: JC/GB; R1/Wall			(by CVES) by Eric H. Ahles on 12/11/23
Analyst Description: Gray, Heterogeneous, Non-Fibrous, Gypsum Board **Asbestos Types:** **Other Material:** Cellulose 2.0%, Non-fibrous 98%			
104-5	123121112-05.1	***No***	NAD
Location: JC/GB; R8/Wall			(by CVES) by Eric H. Ahles on 12/11/23
Analyst Description: White, Heterogeneous, Non-Fibrous, Joint Compound **Asbestos Types:** **Other Material:** Non-fibrous 100%			
104-5	123121112-05.2	***No***	NAD
Location: JC/GB; R8/Wall			(by CVES) by Eric H. Ahles on 12/11/23
Analyst Description: White, Heterogeneous, Non-Fibrous, Gypsum Board **Asbestos Types:** **Other Material:** Cellulose 2.0%, Non-fibrous 98%			
104-6	123121112-06.1	***No***	NAD
Location: JC/GB; R1/Ceiling			(by CVES) by Eric H. Ahles on 12/11/23
Analyst Description: White, Heterogeneous, Non-Fibrous, Joint Compound **Asbestos Types:** **Other Material:** Non-fibrous 100%			

See Reporting notes on last page

PLM Bulk Asbestos Report

2308201; 104 "W" Street; Eureka, CA

Client No. / HGA	Lab No.	Asbestos Present	Total % Asbestos
104-6	123121112-06.2	***No***	NAD
Location: JC/GB; R1/Ceiling			(by CVES) by Eric H. Ahles on 12/11/23
Analyst Description: White, Heterogeneous, Non-Fibrous, Gypsum Board **Asbestos Types:** **Other Material:** Cellulose 2.0%, Non-fibrous 98%			
104-7	123121112-07.1	***No***	NAD
Location: JC/GB; R2/Wall			(by CVES) by Eric H. Ahles on 12/11/23
Analyst Description: White, Heterogeneous, Non-Fibrous, Joint Compound **Asbestos Types:** **Other Material:** Non-fibrous 100%			
104-7	123121112-07.2	***No***	NAD
Location: JC/GB; R2/Wall			(by CVES) by Eric H. Ahles on 12/11/23
Analyst Description: Gray, Heterogeneous, Non-Fibrous, Gypsum Board **Asbestos Types:** **Other Material:** Cellulose 2.0%, Non-fibrous 98%			
104-8	123121112-08.1	***No***	NAD
Location: JC/GB; R5/Ceiling			(by CVES) by Eric H. Ahles on 12/11/23
Analyst Description: White, Heterogeneous, Non-Fibrous, Joint Compound **Asbestos Types:** **Other Material:** Non-fibrous 100%			
104-8	123121112-08.2	***No***	NAD
Location: JC/GB; R5/Ceiling			(by CVES) by Eric H. Ahles on 12/11/23
Analyst Description: Gray, Heterogeneous, Non-Fibrous, Gypsum Board **Asbestos Types:** **Other Material:** Cellulose 2.0%, Non-fibrous 98%			
104-9	123121112-09.1	***No***	NAD
Location: JC/GB; WRR/Wall			(by CVES) by Eric H. Ahles on 12/11/23
Analyst Description: White, Heterogeneous, Non-Fibrous, Joint Compound **Asbestos Types:** **Other Material:** Non-fibrous 100%			

See Reporting notes on last page

PLM Bulk Asbestos Report

2308201; 104 "W" Street; Eureka, CA

Client No. / HGA	Lab No.	Asbestos Present	Total % Asbestos
104-9	123121112-09.2	***No***	NAD
Location: JC/GB; WRR/Wall			(by CVES) by Eric H. Ahles on 12/11/23
Analyst Description: Gray, Heterogeneous, Non-Fibrous, Gypsum Board **Asbestos Types:** **Other Material:** Cellulose 2.0%, Non-fibrous 98%			
104-10	123121112-10.1	***No***	NAD
Location: JC/GB; R7/Wall			(by CVES) by Eric H. Ahles on 12/11/23
Analyst Description: White, Heterogeneous, Non-Fibrous, Joint Compound **Asbestos Types:** **Other Material:** Non-fibrous 100%			
104-10	123121112-10.2	***No***	NAD
Location: JC/GB; R7/Wall			(by CVES) by Eric H. Ahles on 12/11/23
Analyst Description: Gray, Heterogeneous, Non-Fibrous, Gypsum Board **Asbestos Types:** **Other Material:** Cellulose 2.0%, Non-fibrous 98%			
104-11	123121112-11.1	***No***	NAD
Location: JC/GB; R6/Wall			(by CVES) by Eric H. Ahles on 12/11/23
Analyst Description: White, Heterogeneous, Non-Fibrous, Joint Compound **Asbestos Types:** **Other Material:** Non-fibrous 100%			
104-11	123121112-11.2	***No***	NAD
Location: JC/GB; R6/Wall			(by CVES) by Eric H. Ahles on 12/11/23
Analyst Description: White, Heterogeneous, Non-Fibrous, Gypsum Board **Asbestos Types:** **Other Material:** Cellulose 2.0%, Non-fibrous 98%			
104-12	123121112-12.1	***No***	NAD
Location: JC/GB; R1/Wall			(by CVES) by Eric H. Ahles on 12/11/23
Analyst Description: White, Heterogeneous, Non-Fibrous, Joint Compound **Asbestos Types:** **Other Material:** Non-fibrous 100%			

See Reporting notes on last page

PLM Bulk Asbestos Report

2308201; 104 "W" Street; Eureka, CA

Client No. / HGA	Lab No.	Asbestos Present	Total % Asbestos
104-12	123121112-12.2	***No***	NAD
Location: JC/GB; R1/Wall			(by CVES) by Eric H. Ahles on 12/11/23
Analyst Description: White, Heterogeneous, Non-Fibrous, Gypsum Board **Asbestos Types:** **Other Material:** Cellulose 2.0%, Non-fibrous 98%			
104-13	123121112-13.1	***No***	NAD
Location: JC/GB; R9/Ceiling			(by CVES) by Eric H. Ahles on 12/11/23
Analyst Description: White, Heterogeneous, Non-Fibrous, Joint Compound **Asbestos Types:** **Other Material:** Non-fibrous 100%			
104-13	123121112-13.2	***No***	NAD
Location: JC/GB; R9/Ceiling			(by CVES) by Eric H. Ahles on 12/11/23
Analyst Description: White, Heterogeneous, Non-Fibrous, Gypsum Board **Asbestos Types:** **Other Material:** Cellulose 2.0%, Non-fibrous 98%			
104-14	123121112-14.1	***No***	NAD
Location: JC/GB; R10/Wall			(by CVES) by Eric H. Ahles on 12/11/23
Analyst Description: White, Heterogeneous, Non-Fibrous, Joint Compound **Asbestos Types:** **Other Material:** Non-fibrous 100%			
104-14	123121112-14.2	***No***	NAD
Location: JC/GB; R10/Wall			(by CVES) by Eric H. Ahles on 12/11/23
Analyst Description: White, Heterogeneous, Non-Fibrous, Gypsum Board **Asbestos Types:** **Other Material:** Cellulose 2.0%, Non-fibrous 98%			
104-15	123121112-15.1	***No***	NAD
Location: JC/GB; R12/Wall			(by CVES) by Eric H. Ahles on 12/11/23
Analyst Description: White, Heterogeneous, Non-Fibrous, Joint Compound **Asbestos Types:** **Other Material:** Non-fibrous 100%			

See Reporting notes on last page

PLM Bulk Asbestos Report

2308201; 104 "W" Street; Eureka, CA

Client No. / HGA	Lab No.	Asbestos Present	Total % Asbestos
104-15	123121112-15.2	***No***	NAD
Location: JC/GB; R12/Wall			(by CVES) by Eric H. Ahles on 12/11/23
Analyst Description: White, Heterogeneous, Non-Fibrous, Gypsum Board **Asbestos Types:** **Other Material:** Cellulose 2.0%, Non-fibrous 98%			
104-16	123121112-16.1	***No***	NAD
Location: JC/GB; R12/Wall			(by CVES) by Eric H. Ahles on 12/11/23
Analyst Description: White, Heterogeneous, Non-Fibrous, Joint Compound **Asbestos Types:** **Other Material:** Non-fibrous 100%			
104-16	123121112-16.2	***No***	NAD
Location: JC/GB; R12/Wall			(by CVES) by Eric H. Ahles on 12/11/23
Analyst Description: White, Heterogeneous, Non-Fibrous, Gypsum Board **Asbestos Types:** **Other Material:** Cellulose 2.0%, Non-fibrous 98%			
104-17	123121112-17.1	***No***	NAD
Location: JC/GB; R11/Wall			(by CVES) by Eric H. Ahles on 12/11/23
Analyst Description: White, Heterogeneous, Non-Fibrous, Joint Compound **Asbestos Types:** **Other Material:** Non-fibrous 100%			
104-17	123121112-17.2	***No***	NAD
Location: JC/GB; R11/Wall			(by CVES) by Eric H. Ahles on 12/11/23
Analyst Description: White, Heterogeneous, Non-Fibrous, Gypsum Board **Asbestos Types:** **Other Material:** Cellulose 2.0%, Non-fibrous 98%			
104-18	123121112-18.1	***No***	NAD
Location: JC/GB; R9/Wall			(by CVES) by Eric H. Ahles on 12/11/23
Analyst Description: White, Heterogeneous, Non-Fibrous, Joint Compound **Asbestos Types:** **Other Material:** Non-fibrous 100%			

See Reporting notes on last page

PLM Bulk Asbestos Report

2308201; 104 "W" Street; Eureka, CA

Client No. / HGA	Lab No.	Asbestos Present	Total % Asbestos
104-18	123121112-18.2	***No***	NAD
Location: JC/GB; R9/Wall			(by CVES) by Eric H. Ahles on 12/11/23
Analyst Description: White, Heterogeneous, Non-Fibrous, Gypsum Board **Asbestos Types:** **Other Material:** Cellulose 2.0%, Non-fibrous 98%			
104-19	123121112-19	***No***	NAD
Location: Drywall Texture, Skip Trowel (Type 1); R11/Wall			(by CVES) by Eric H. Ahles on 12/11/23
Analyst Description: White, Heterogeneous, Non-Fibrous, Drywall Texture **Asbestos Types:** **Other Material:** Non-fibrous 100%			
104-20	123121112-20	***No***	NAD
Location: Drywall Texture, Skip Trowel (Type 1); R12/Wall			(by CVES) by Eric H. Ahles on 12/11/23
Analyst Description: White, Heterogeneous, Non-Fibrous, Drywall Texture **Asbestos Types:** **Other Material:** Non-fibrous 100%			
104-21	123121112-21	***No***	NAD
Location: Drywall Texture, Skip Trowel (Type 1); R12/Wall			(by CVES) by Eric H. Ahles on 12/11/23
Analyst Description: White, Heterogeneous, Non-Fibrous, Drywall Texture **Asbestos Types:** **Other Material:** Non-fibrous 100%			
104-22	123121112-22	***No***	NAD
Location: Drywall Texture, Skip Trowel (Type 2); R10/Wall			(by CVES) by Eric H. Ahles on 12/11/23
Analyst Description: White, Heterogeneous, Non-Fibrous, Drywall Texture **Asbestos Types:** **Other Material:** Non-fibrous 100%			
104-23	123121112-23	***No***	NAD
Location: Drywall Texture, Skip Trowel (Type 2); R12/Wall			(by CVES) by Eric H. Ahles on 12/11/23
Analyst Description: White, Heterogeneous, Non-Fibrous, Drywall Texture **Asbestos Types:** **Other Material:** Non-fibrous 100%			

See Reporting notes on last page

PLM Bulk Asbestos Report

2308201; 104 "W" Street; Eureka, CA

Client No. / HGA	Lab No.	Asbestos Present	Total % Asbestos
104-24	123121112-24	***No***	NAD
Location: Drywall Texture, Skip Trowel (Type 2); R9/Wall			(by CVES) by Eric H. Ahles on 12/11/23
Analyst Description: White, Heterogeneous, Non-Fibrous, Drywall Texture **Asbestos Types:** **Other Material:** Non-fibrous 100%			
104-25	123121112-25	***No***	NAD
Location: Drywall Texture, Skip Trowel (Type 2); WRR/Wall			(by CVES) by Eric H. Ahles on 12/11/23
Analyst Description: White, Heterogeneous, Non-Fibrous, Drywall Texture **Asbestos Types:** **Other Material:** Non-fibrous 100%			
104-26	123121112-26	***No***	NAD
Location: Drywall Texture, Skip Trowel (Type 2); R6/Wall			(by CVES) by Eric H. Ahles on 12/11/23
Analyst Description: White, Heterogeneous, Non-Fibrous, Drywall Texture **Asbestos Types:** **Other Material:** Non-fibrous 100%			
104-27	123121112-27	***No***	NAD
Location: Drywall Texture, Skip Trowel (Type 2); R7/Wall			(by CVES) by Eric H. Ahles on 12/11/23
Analyst Description: White, Heterogeneous, Non-Fibrous, Drywall Texture **Asbestos Types:** **Other Material:** Non-fibrous 100%			
104-28	123121112-28	***No***	NAD
Location: Drywall Texture, Skip Trowel (Type 2); R1/Wall			(by CVES) by Eric H. Ahles on 12/11/23
Analyst Description: White, Heterogeneous, Non-Fibrous, Drywall Texture **Asbestos Types:** **Other Material:** Non-fibrous 100%			
104-29	123121112-29	***No***	NAD
Location: Drywall Texture, Skip Trowel (Type 3); R1/Wall			(by CVES) by Eric H. Ahles on 12/11/23
Analyst Description: White, Heterogeneous, Non-Fibrous, Drywall Texture **Asbestos Types:** **Other Material:** Non-fibrous 100%			

See Reporting notes on last page

PLM Bulk Asbestos Report

2308201; 104 "W" Street; Eureka, CA

Client No. / HGA	Lab No.	Asbestos Present	Total % Asbestos
104-30	123121112-30	***No***	NAD
Location: Drywall Texture, Skip Trowel (Type 3); R5/Ceiling			(by CVES) by Eric H. Ahles on 12/11/23
Analyst Description: White, Heterogeneous, Non-Fibrous, Drywall Texture **Asbestos Types:** **Other Material:** Non-fibrous 100%			
104-31	123121112-31	***No***	NAD
Location: Drywall Texture, Skip Trowel (Type 3); R8/Wall			(by CVES) by Eric H. Ahles on 12/11/23
Analyst Description: White, Heterogeneous, Non-Fibrous, Drywall Texture **Asbestos Types:** **Other Material:** Non-fibrous 100%			
104-32	123121112-32	***No***	NAD
Location: Drywall Texture, Skip Trowel (Type 3); R2/Wall			(by CVES) by Eric H. Ahles on 12/11/23
Analyst Description: White, Heterogeneous, Non-Fibrous, Drywall Texture **Asbestos Types:** **Other Material:** Non-fibrous 100%			
104-33	123121112-33	***No***	NAD
Location: Drywall Texture, Skip Trowel (Type 3); R3/Wall			(by CVES) by Eric H. Ahles on 12/11/23
Analyst Description: White, Heterogeneous, Non-Fibrous, Drywall Texture **Asbestos Types:** **Other Material:** Non-fibrous 100%			
104-34	123121112-34	***No***	NAD
Location: Drywall Texture, Skip Trowel (Type 3); R4/Wall			(by CVES) by Eric H. Ahles on 12/11/23
Analyst Description: White, Heterogeneous, Non-Fibrous, Drywall Texture **Asbestos Types:** **Other Material:** Non-fibrous 100%			
104-35	123121112-35	***Yes***	2.0%
Location: Sink Pan Undercoat, Black; R5/Underside Of Sink Pan			(by CVES) by Eric H. Ahles on 12/11/23
Analyst Description: Black, Heterogeneous, Non-Fibrous, Undercoating **Asbestos Types:** Chrysotile 2.0% **Other Material:** Non-fibrous 98%			

See Reporting notes on last page

PLM Bulk Asbestos Report

2308201; 104 "W" Street; Eureka, CA

Client No. / HGA	Lab No.	Asbestos Present	Total % Asbestos
104-36	123121112-36	***No***	NAD
Location: SF, Brown; R2/Floor/			(by CVES) by Eric H. Ahles on 12/11/23
Analyst Description: Brown, Heterogeneous, Fibrous, Sheet Flooring **Asbestos Types:** **Other Material:** Cellulose 90%, Non-fibrous 10%			
104-37	123121112-37	***No***	NAD
Location: SF, Brown; R2/Floor/			(by CVES) by Eric H. Ahles on 12/11/23
Analyst Description: Brown, Heterogeneous, Fibrous, Sheet Flooring **Asbestos Types:** **Other Material:** Cellulose 90%, Non-fibrous 10%			
104-38	123121112-38	***No***	NAD
Location: SF, Brown; R3/Floor/			(by CVES) by Eric H. Ahles on 12/11/23
Analyst Description: Brown, Heterogeneous, Fibrous, Sheet Flooring **Asbestos Types:** **Other Material:** Cellulose 90%, Non-fibrous 10%			
104-39	123121112-39	***No***	NAD
Location: SF, Brown; R3/Floor/			(by CVES) by Eric H. Ahles on 12/11/23
Analyst Description: Brown, Heterogeneous, Fibrous, Sheet Flooring **Asbestos Types:** **Other Material:** Cellulose 90%, Non-fibrous 10%			
104-40 1	123121112-40	***Yes***	20%
Location: SF, Tan; R4/Floor/			(by CVES) by Eric H. Ahles on 12/11/23
Analyst Description: Tan, Heterogeneous, Non-Fibrous, Sheet Flooring **Asbestos Types:** Chrysotile 20% **Other Material:** Cellulose 5.0%, Non-fibrous 75%			
104-41 1	123121112-41		NA/PS
Location: SF, Tan; R4/Floor/			
Analyst Description: Sheet Flooring **Asbestos Types:** **Other Material:**			

See Reporting notes on last page

PLM Bulk Asbestos Report

2308201; 104 "W" Street; Eureka, CA

Client No. / HGA	Lab No.	Asbestos Present	Total % Asbestos
104-42	123121112-42	***No***	NAD
Location: Tarpaper, Black; R4/Floor/			(by CVES) by Eric H. Ahles on 12/11/23
Analyst Description: Black, Heterogeneous, Fibrous, Tar Paper **Asbestos Types:** **Other Material:** Cellulose 70%, Non-fibrous 30%			
104-43	123121112-43	***No***	NAD
Location: Paper, Brown; R8/Floor/			(by CVES) by Eric H. Ahles on 12/11/23
Analyst Description: Brown, Heterogeneous, Fibrous, Paper **Asbestos Types:** **Other Material:** Cellulose 100%			
104-44 2	123121112-44	***Yes***	25%
Location: SF, Tan; R1/Floor/			(by CVES) by Eric H. Ahles on 12/11/23
Analyst Description: Tan, Heterogeneous, Non-Fibrous, Sheet Flooring **Asbestos Types:** Chrysotile 25% **Other Material:** Cellulose 5.0%, Non-fibrous 70%			
104-45 2	123121112-45		NA/PS
Location: SF, Tan; R5/Floor/			
Analyst Description: Sheet Flooring **Asbestos Types:** **Other Material:**			
104-46	123121112-46	***No***	NAD
Location: Tarpaper, Black; R1/Floor/			(by CVES) by Eric H. Ahles on 12/11/23
Analyst Description: Black, Heterogeneous, Fibrous, Tar Paper **Asbestos Types:** **Other Material:** Cellulose 70%, Non-fibrous 30%			
104-47	123121112-47	***No***	NAD
Location: Tarpaper, Black; R5/Floor/			(by CVES) by Eric H. Ahles on 12/11/23
Analyst Description: Black, Heterogeneous, Fibrous, Tar Paper **Asbestos Types:** **Other Material:** Cellulose 70%, Non-fibrous 30%			

See Reporting notes on last page

PLM Bulk Asbestos Report

2308201; 104 "W" Street; Eureka, CA

Client No. / HGA	Lab No.	Asbestos Present	Total % Asbestos
104-48	123121112-48	***Yes***	25%
Location: SF, Tan; R1/Floor/			(by CVES) by Eric H. Ahles on 12/11/23
Analyst Description: Tan, Heterogeneous, Fibrous, Sheet Flooring **Asbestos Types:** Chrysotile 25% **Other Material:** Cellulose 5.0%, Non-fibrous 70%			
104-49	123121112-49	***No***	NAD
Location: Tarpaper, Brown; R1/Floor/			(by CVES) by Eric H. Ahles on 12/11/23
Analyst Description: Black, Heterogeneous, Fibrous, Tar Paper **Asbestos Types:** **Other Material:** Cellulose 70%, Non-fibrous 30%			
104-50	123121112-50	***No***	NAD
Location: Tarpaper, Brown; R6/Floor/			(by CVES) by Eric H. Ahles on 12/11/23
Analyst Description: Black, Heterogeneous, Fibrous, Tar Paper **Asbestos Types:** **Other Material:** Cellulose 70%, Non-fibrous 30%			
104-51	123121112-51	***Yes***	25%
Location: SF Backing, Gray; WRR/Cabinet Base/			(by CVES) by Eric H. Ahles on 12/11/23
Analyst Description: Gray, Heterogeneous, Non-Fibrous, Sheet Flooring **Asbestos Types:** Chrysotile 25% **Other Material:** Cellulose 5.0%, Non-fibrous 70%			
104-52	123121112-52	***No***	NAD
Location: BBM, Tan; WRR/Vinyl Baseboard			(by CVES) by Eric H. Ahles on 12/11/23
Analyst Description: Tan, Homogeneous, Non-Fibrous, Mastic **Asbestos Types:** **Other Material:** Non-fibrous 100%			
104-53	123121112-53	***No***	NAD
Location: BBM, Tan; R5/Vinyl Baseboard			(by CVES) by Eric H. Ahles on 12/11/23
Analyst Description: Tan, Homogeneous, Non-Fibrous, Mastic **Asbestos Types:** **Other Material:** Non-fibrous 100%			

See Reporting notes on last page

PLM Bulk Asbestos Report

2308201; 104 "W" Street; Eureka, CA

Client No. / HGA	Lab No.	Asbestos Present	Total % Asbestos
104-54 3	123121112-54 **Location:** SF, Tan W-Speckles; WRR/Floor/	***No***	NAD (by CVES) by Eric H. Ahles on 12/11/23
Analyst Description: Tan, Heterogeneous, Non-Fibrous, Sheet Flooring **Asbestos Types:** **Other Material:** Cellulose 30%, Non-fibrous 70%			
104-55 3	123121112-55 **Location:** SF, Tan W-Speckles; R5/Floor/	***No***	NAD (by CVES) by Eric H. Ahles on 12/11/23
Analyst Description: Tan, Heterogeneous, Non-Fibrous, Sheet Flooring **Asbestos Types:** **Other Material:** Cellulose 30%, Non-fibrous 70%			
104-56 3	123121112-56 **Location:** SF, Tan W-Speckles; R9/Floor/	***No***	NAD (by CVES) by Eric H. Ahles on 12/11/23
Analyst Description: Tan, Heterogeneous, Non-Fibrous, Sheet Flooring **Asbestos Types:** **Other Material:** Cellulose 30%, Non-fibrous 70%			
104-57	123121112-57 **Location:** BBM, Tan; R9/Vinyl Baseboard	***No***	NAD (by CVES) by Eric H. Ahles on 12/11/23
Analyst Description: Tan, Homogeneous, Non-Fibrous, Mastic **Asbestos Types:** **Other Material:** Non-fibrous 100%			

Reporting Notes:

Analyzed by: Eric H. Ahles
Date: 12/11/2023

Reviewed by: Eric H. Ahles

*NAD = no asbestos detected, Detection Limit <1%, Reporting Limits: CVES = 1%, 400 Pt Ct = 0.25%, 1000 Pt Ct = 0.1%; "Present" or NVA = "No Visible Asbestos" are observations made during a qualitative analysis; NA = not analyzed; NA/PS = not analyzed / positive stop; PLM Bulk Asbestos Analysis using Meiji, Model MT 6130 microscope, Serial #1410298, by EPA 600/R-93/116 per 40 CFR 763 (NVLAP Lab Code 101904-0) and ELAP PLM Analysis Protocol 198.1 for New York friable samples which includes quantitation of any vermiculite observed (198.6 for NOB samples) or EPA 400 pt ct by EPA 600/M4-82-020 (NYSDOH ELAP Lab # 10984); CA ELAP Lab # 2508; Note: PLM is not consistently reliable in detecting asbestos in floor coverings and similar NOB materials. NAD or Trace results by PLM are inconclusive, TEM is currently the only method that can be used to determine if this material can be considered or treated as non-asbestos-containing in New York State (also see EPA Advisory for floor tile, FR 59, 146, 38970, 8/1/94). NIST Accreditation requirements mandate that this report must not be reproduced except in full without the approval of the laboratory. This PLM report relates ONLY to the items tested.

AmeriSci Richmond
13635 GENITO ROAD
MIDLOTHIAN, VIRGINIA 23112
TEL: (804) 763-1200 • FAX: (804) 763-1800

PLM Bulk Asbestos Report

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

Arcata, CA 95518

Date Received 12/12/23
Date Examined 12/14/23

AmeriSci Job # 123121376
P.O. #

RE: 2308201; 104 "W" Street; Eureka, CA

Client No. / HGA	Lab No.	Asbestos Present	Total % Asbestos
104-58	123121376-01	***No***	NAD (by CVES) by Eric H. Ahles on 12/14/23
Location: Tarpaper, Black; Ext/Siding			
Analyst Description: Black, Heterogeneous, Fibrous, Tar Paper			
Asbestos Types:			
Other Material: Cellulose 60%, Non-fibrous 40%			
104-59	123121376-02	***No***	NAD (by CVES) by Eric H. Ahles on 12/14/23
Location: Concrete, Gray; Ext/Foundation Wall			
Analyst Description: Gray, Heterogeneous, Non-Fibrous, Cementitious, Concrete			
Asbestos Types:			
Other Material: Non-fibrous 100%			
104-60	123121376-03	***No***	NAD (by CVES) by Eric H. Ahles on 12/14/23
Location: Concrete, Gray; Ext/Foundation Wall			
Analyst Description: Gray, Heterogeneous, Non-Fibrous, Cementitious, Concrete			
Asbestos Types:			
Other Material: Non-fibrous 100%			
104-61	123121376-04	***No***	NAD (by CVES) by Eric H. Ahles on 12/14/23
Location: Brick, Red; Ext/Front Porch			
Analyst Description: Red, Heterogeneous, Non-Fibrous, Cementitious, Brick			
Asbestos Types:			
Other Material: Non-fibrous 100%			
104-62	123121376-05	***No***	NAD (by CVES) by Eric H. Ahles on 12/14/23
Location: Brick, Red; Ext/Front Porch			
Analyst Description: Red, Heterogeneous, Non-Fibrous, Cementitious, Brick			
Asbestos Types:			
Other Material: Non-fibrous 100%			

See Reporting notes on last page

PLM Bulk Asbestos Report

2308201; 104 "W" Street; Eureka, CA

Client No. / HGA	Lab No.	Asbestos Present	Total % Asbestos
104-63	123121376-06	***No***	NAD (by CVES) by Eric H. Ahles on 12/14/23
Location: Mortar, Gray; Ext/Front Porch			
Analyst Description: Gray, Heterogeneous, Non-Fibrous, Cementitious, Mortar			
Asbestos Types:			
Other Material: Non-fibrous 100%			
104-64	123121376-07	***No***	NAD (by CVES) by Eric H. Ahles on 12/14/23
Location: Mortar, Gray; Ext/Front Porch			
Analyst Description: Gray, Heterogeneous, Non-Fibrous, Cementitious, Mortar			
Asbestos Types:			
Other Material: Non-fibrous 100%			
104-65	123121376-08	***No***	NAD (by CVES) by Eric H. Ahles on 12/14/23
Location: Mortar, Gray; Ext/Front Porch			
Analyst Description: Gray, Heterogeneous, Non-Fibrous, Cementitious, Mortar			
Asbestos Types:			
Other Material: Non-fibrous 100%			
104-66	123121376-09	***No***	NAD (by CVES) by Eric H. Ahles on 12/14/23
Location: Tarpaper, Black; Ext/Siding			
Analyst Description: Black, Heterogeneous, Fibrous, Tar Paper			
Asbestos Types:			
Other Material: Cellulose 60%, Non-fibrous 40%			
104-67	123121376-10	***No***	NAD (by CVES) by Eric H. Ahles on 12/14/23
Location: Tarpaper, Black; Ext/Siding			
Analyst Description: Black, Heterogeneous, Fibrous, Tar Paper			
Asbestos Types:			
Other Material: Cellulose 60%, Non-fibrous 40%			
104-68	123121376-11	***No***	NAD (by CVES) by Eric H. Ahles on 12/14/23
Location: Concrete, Gray; Ext/Foundation Wall			
Analyst Description: Gray, Heterogeneous, Non-Fibrous, Cementitious, Concrete			
Asbestos Types:			
Other Material: Non-fibrous 100%			

See Reporting notes on last page

PLM Bulk Asbestos Report

2308201; 104 "W" Street; Eureka, CA

Client No. / HGA	Lab No.	Asbestos Present	Total % Asbestos
104-69	123121376-12	***No***	NAD
Location: Concrete, Gray; Ext/Foundation Wall			(by CVES) by Eric H. Ahles on 12/14/23
Analyst Description: Gray, Heterogeneous, Non-Fibrous, Cementitious, Concrete **Asbestos Types:** **Other Material:** Non-fibrous 100%			
104-70	123121376-13	***No***	NAD
Location: Cinderblock, Gray; Ext/Front Foundation Wall			(by CVES) by Eric H. Ahles on 12/14/23
Analyst Description: Gray, Heterogeneous, Non-Fibrous, Cementitious, Cinderblock **Asbestos Types:** **Other Material:** Non-fibrous 100%			
104-71	123121376-14	***No***	NAD
Location: Mortar, Gray; Ext/Front Foundation Wall			(by CVES) by Eric H. Ahles on 12/14/23
Analyst Description: Gray, Heterogeneous, Non-Fibrous, Cementitious, Mortar **Asbestos Types:** **Other Material:** Non-fibrous 100%			
104-72	123121376-15	***No***	NAD
Location: Mortar, Gray; Ext/Front Foundation Wall			(by CVES) by Eric H. Ahles on 12/14/23
Analyst Description: Gray, Heterogeneous, Non-Fibrous, Cementitious, Mortar **Asbestos Types:** **Other Material:** Non-fibrous 100%			
104-73	123121376-16	***No***	NAD
Location: Roofing, Gray Comp Shingle; Roof/Main Membrane/Top Layer			(by CVES) by Eric H. Ahles on 12/14/23
Analyst Description: Black/Gray, Heterogeneous, Non-Fibrous, Roofing **Asbestos Types:** **Other Material:** Fibrous glass 2.0%, Non-fibrous 98%			
104-74	123121376-17	***No***	NAD
Location: Roofing, Gray Comp Shingle; Roof/Main Membrane/Top Layer			(by CVES) by Eric H. Ahles on 12/14/23
Analyst Description: Black/Gray, Heterogeneous, Non-Fibrous, Roofing **Asbestos Types:** **Other Material:** Fibrous glass 2.0%, Non-fibrous 98%			

See Reporting notes on last page

PLM Bulk Asbestos Report

2308201; 104 "W" Street; Eureka, CA

Client No. / HGA	Lab No.	Asbestos Present	Total % Asbestos
104-75	123121376-18	***No***	NAD
Location: Roofing, Gray Comp Shingle; Roof/Main Membrane/Top Layer			(by CVES) by Eric H. Ahles on 12/14/23
Analyst Description: Black/Gray, Heterogeneous, Non-Fibrous, Roofing			
Asbestos Types:			
Other Material: Fibrous glass 2.0%, Non-fibrous 98%			
104-76	123121376-19	***No***	NAD
Location: Roofing, Gray Comp Shingle; Roof/Main Membrane/Middle Layer			(by CVES) by Eric H. Ahles on 12/14/23
Analyst Description: Black/Gray, Heterogeneous, Non-Fibrous, Roofing			
Asbestos Types:			
Other Material: Fibrous glass 2.0%, Non-fibrous 98%			
104-77	123121376-20	***No***	NAD
Location: Roofing, Gray Comp Shingle; Roof/Main Membrane/Middle Layer			(by CVES) by Eric H. Ahles on 12/14/23
Analyst Description: Black/Gray, Heterogeneous, Non-Fibrous, Roofing			
Asbestos Types:			
Other Material: Fibrous glass 2.0%, Non-fibrous 98%			
104-78	123121376-21	***No***	NAD
Location: Roofing, Gray Comp Shingle; Roof/Main Membrane/Middle Layer			(by CVES) by Eric H. Ahles on 12/14/23
Analyst Description: Black/Gray, Heterogeneous, Non-Fibrous, Roofing			
Asbestos Types:			
Other Material: Fibrous glass 2.0%, Non-fibrous 98%			
104-79	123121376-22	***No***	NAD
Location: Tarpaper, Black; Roof/Main Membrane/Bottom Layer			(by CVES) by Eric H. Ahles on 12/14/23
Analyst Description: Black, Heterogeneous, Fibrous, Tar Paper			
Asbestos Types:			
Other Material: Cellulose 60%, Non-fibrous 40%			
104-80	123121376-23	***No***	NAD
Location: Tarpaper, Black; Roof/Main Membrane/Bottom Layer			(by CVES) by Eric H. Ahles on 12/14/23
Analyst Description: Black, Heterogeneous, Fibrous, Tar Paper			
Asbestos Types:			
Other Material: Cellulose 60%, Non-fibrous 40%			

See Reporting notes on last page

PLM Bulk Asbestos Report

2308201; 104 "W" Street; Eureka, CA

Client No. / HGA	Lab No.	Asbestos Present	Total % Asbestos
104-81	123121376-24	***No***	NAD
Location: Tarpaper, Black; Roof/Main Membrane/Bottom Layer			(by CVES) by Eric H. Ahles on 12/14/23

Analyst Description: Black, Heterogeneous, Fibrous, Tar Paper
Asbestos Types:
Other Material: Cellulose 60%, Non-fibrous 40%

Reporting Notes:

Analyzed by: Eric H. Ahles
Date: 12/14/2023

Reviewed by: Eric H. Ahles

*NAD = no asbestos detected, Detection Limit <1%, Reporting Limits: CVES = 1%, 400 Pt Ct = 0.25%, 1000 Pt Ct = 0.1%; "Present" or NVA = "No Visible Asbestos" are observations made during a qualitative analysis; NA = not analyzed; NA/PS = not analyzed / positive stop; PLM Bulk Asbestos Analysis using Meiji, Model MT 6130 microscope, Serial #1410298, by EPA 600/R-93/116 per 40 CFR 763 (NVLAP Lab Code 101904-0) and ELAP PLM Analysis Protocol 198.1 for New York friable samples which includes quantitation of any vermiculite observed (198.6 for NOB samples) or EPA 400 pt ct by EPA 600/M4-82-020 (NYSDOH ELAP Lab # 10984); CA ELAP Lab # 2508; Note: PLM is not consistently reliable in detecting asbestos in floor coverings and similar NOB materials. NAD or Trace results by PLM are inconclusive, TEM is currently the only method that can be used to determine if this material can be considered or treated as non-asbestos-containing in New York State (also see EPA Advisory for floor tile, FR 59, 146, 38970, 8/1/94). NIST Accreditation requirements mandate that this report must not be reproduced except in full without the approval of the laboratory. This PLM report relates ONLY to the items tested.

123-12-1112

Analysis: X Standard PLM ___ 400 Point Count ___ 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 (707) 672-5345 zbconsult@outlook.com	Date: 12/2/23 Site: 104 "W" Street Eureka, CA Proj. # 2308201

BULK ASBESTOS SAMPLING

Sample No.	Sample Description	Location	Mat'l Type	Friability
104-1	JC/GB	R2 / wall	MM	NF
-2		R3 /		
-3		R4 / ceiling		
-4		R1 / wall		
-5		R8 /		
-6		R1 / ceiling		
-7		R2 / wall		
-8		R5 / ceiling		
-9		WRR / wall		
-10		R7 /		
-11		R6 /		
-12		R1 /		
-13		R9 / ceiling		
-14		R10 / wall		
-15		R12 /		

Sample Abbreviations
VFT = Vinyl Floor Tile
SF = Sheet Flooring
JC/GB = Joint Compound/Gypsum Board
CT = Ceiling Tile
CP = Ceiling Panel
BBM = Baseboard Mastic

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

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

Sampled by: Zindar Brunelle	Received by:
Relinquished by: Date/Time: 12/4/23	Signature: Kenyelle M Date/Time: 12/7/23

123-12-1112

Analysis: X Standard PLM ___ 400 Point Count ___ 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 (707) 672-5345 zbconsult@outlook.com	Date: 12/2/23 Site: 104 "W" Street Eureka, CA Proj. # 2308201

BULK ASBESTOS SAMPLING

Sample No.	Sample Description	Location	Mat'l Type	Friability
104-16	JC/GB	R12 / wall	MM	NF
-17		R11 /		
-18		R9 /		
-19	Drywall Texture, Skip Trowel (Type 1)	R11 /	SM	
-20		R12 /		
-21		/		
-22	Drywall Texture, Skip trowel (Type 2)	R10 /		
-23		R12 /		
-24		R9 /		
-25		WRR /		
-26		R6 /		
-27		R7 /		
-28		R1 /		
-29	Drywall Texture, Skip Trowel (Type 3)	/		
-30		R5 / Ceiling		

Sample Abbreviations

VFT = Vinyl Floor Tile
SF = Sheet Flooring
JC/GB = Joint Compound/Gypsum Board
CT = Ceiling Tile
CP = Ceiling Panel
BBM = Baseboard Mastic

Material Type

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

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

Sampled by: Zindar Brunelle	Received by:
Relinquished by: Date/Time: 12/4/23	Signature: Date/Time: 12/7/23

123-12-1112

Analysis: X Standard PLM ___ 400 Point Count ___ 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 (707) 672-5345 zbconsult@outlook.com	Date: 12/2/23 Site: 104 "W" Street Eureka, CA Proj. # 2308201

BULK ASBESTOS SAMPLING

Sample No.	Sample Description	Location	Mat'l Type	Friability
104-31	Drywall Texture, Skip Trowel (Type 3)	R8 / wall	SM	NF
-32		R2 /		
-33		R3 /		
-34		R4 /		
-35	Sinkpan undercoat, black	R5 / underside of sink pan	MM	
-36	SF, brown	R2 / Floor / under laminate flooring		F
-37		/ /		
-38		R3 / /		
-39		/ /		
-40	SF, tan	R4 / / under carpet		
-41		/ /		
-42	Tarpaper, black	/ / on sub-floor		NF
-43	Paper, brown	R8 / / under laminate & plywood		F
-44	SF, tan	R1 / / under carpet		
-45		R5 / / under sheet flooring & plywood		

Sample Abbreviations

VFT = Vinyl Floor Tile
SF = Sheet Flooring
JC/GB = Joint Compound/Gypsum Board
CT = Ceiling Tile
CP = Ceiling Panel
BBM = Baseboard Mastic

Material Type

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

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

Sampled by: Zindar Brunelle	Received by:
Relinquished by: Date/Time: 12/4/23	Signature: Date/Time: 12.7.23

123-12-1112

Analysis: X Standard PLM ___ 400 Point Count ___ 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 (707) 672-5345 zbconsult@outlook.com	Date: 12/2/23 Site: 104 "W" Street Eureka, CA Proj. # 2308201

BULK ASBESTOS SAMPLING

Sample No.	Sample Description	Location	Mat'l Type	Friability
104-46	Tarpaper, black	R1 / Floor / on sub-floor	MM	NF
-47	↓	R5 / / ↓		↓
-48	SF, tan	R1 / / under carpet		F
-49	Tarpaper, brown	↓ / / on sub-floor		NF
-50	↓	R6 / ↓ / ↓		↓
-51	SF backing, gray	WRR / cabinet Base / Vinyl baseboard		F
-52	BBM, tan	↓ / Vinyl baseboard		NF
-53	↓	R5 / ↓		↓
-54	SF, tan w-speckles	WRR / Floor / only Layer		F
-55		R5 / / Top Layer		
-56	↓	R9 / ↓ / only Layer		↓
-57	BBM, tan	↓ / Vinyl baseboard	↓	NF

Sample Abbreviations

VFT = Vinyl Floor Tile
SF = Sheet Flooring
JC/GB = Joint Compound/Gypsum Board
CT = Ceiling Tile
CP = Ceiling Panel
BBM = Baseboard Mastic

Material Type

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

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

Sampled by: Linda Brunelle	Received by:
Relinquished by: [signature] Date/Time: 12/4/23	Signature: [signature] Date/Time: 12.7.23

123121376

Analysis: X Standard PLM ___ 400 Point Count ___ 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 (707) 672-5345 zbconsult@outlook.com	Date: 12/10/23 Site: 104 "W" Street Eureka, CA Proj. # 2308201

BULK ASBESTOS SAMPLING

Sample No.	Sample Description	Location	Mat'l Type	Friability
104-58	Tarpaper, black	Ext. / Siding	MM	NF
-59	Concrete, gray	/ Foundation wall		
-60	↓	/ ↓		
-61	Brick, red	/ Front porch		
-62	↓	/		
-63	Mortar, gray	/		
-64		/		
-65	↓	/ ↓		
-66	Tarpaper, black	/ Siding		
-67	↓	/ ↓		
-68	Concrete, gray	/ Foundation wall		
-69	↓	/ ↓		
-70	Cinderblock, gray	/ Front Foundation wall		
-71	Mortar, gray	/		
-72	↓	↓ / ↓	↓	↓

Sample Abbreviations

VFT = Vinyl Floor Tile
SF = Sheet Flooring
JC/GB = Joint Compound/Gypsum Board
CT = Ceiling Tile
CP = Ceiling Panel
BBM = Baseboard Mastic

Material Type

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

Received
DEC 12 2023

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

Sampled by: Zindar Brunelle	Received by:
Relinquished by: Date/Time: 12/11/23	Signature: Date/Time:

123121376

Analysis: X Standard PLM ___ 400 Point Count ___ 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 (707) 672-5345 zbconsult@outlook.com	Date: 12/10/23 Site: 104 "W" Street Eureka, CA Proj. # 2308201

BULK ASBESTOS SAMPLING

Sample No.	Sample Description	Location	Mat'l Type	Friability
104-73	Roofing, gray comp. shingle	Roof / Main Membrane / Top Layer	MM	NF
-74	↓	↓	↓	↓
-75	↓	↓	↓	↓
-76	Roofing, gray comp. shingle	Middle Layer	↓	↓
-77	↓	↓	↓	↓
-78	↓	↓	↓	↓
-79	Tarpaper, black	Bottom Layer	↓	↓
-80	↓	↓	↓	↓
-81	↓	↓	↓	↓

Sample Abbreviations

VFT = Vinyl Floor Tile
SF = Sheet Flooring
JC/GB = Joint Compound/Gypsum Board
CT = Ceiling Tile
CP = Ceiling Panel
BBM = Baseboard Mastic

Material Type

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

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

Received

Sampled by: Zindar Brunelle	Received by: DEC 12 2023
Relinquished by: Zindar Brunelle Date/Time: 12/11/23	Signature: Date/Time:

XRF Paint Analyzer Data Sheet
(Part 1)
104 W Street
Eureka, CA

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

Reading #	Concentration	Units	3 SD	Result	Action Level	NomSecs	Date	Time	User	Mode	Analytic Mode
1	1	mg/cm2	0.3	Positive	1	5	12/2/2023	22:30:35	zburnelle	Action Level	Lead Paint
2	1	mg/cm2	0.3	Positive	1	5	12/2/2023	22:31:51	zburnelle	Action Level	Lead Paint
3	1.1	mg/cm2	0.3	Positive	1	5	12/2/2023	22:33:06	zburnelle	Action Level	Lead Paint
4	0.1	mg/cm2	0.4	Negative	1	2	12/2/2023	22:35:06	zburnelle	Action Level	Lead Paint
5	-0.2	mg/cm2	0.4	Negative	1	2	12/2/2023	22:35:46	zburnelle	Action Level	Lead Paint
6	-0.2	mg/cm2	0.4	Negative	1	2	12/2/2023	22:36:32	zburnelle	Action Level	Lead Paint
7	-0.1	mg/cm2	0.4	Negative	1	2	12/2/2023	22:37:13	zburnelle	Action Level	Lead Paint
8	0.2	mg/cm2	0.4	Negative	1	2	12/2/2023	22:37:59	zburnelle	Action Level	Lead Paint
9	-0.1	mg/cm2	0.4	Negative	1	2	12/2/2023	22:38:39	zburnelle	Action Level	Lead Paint
10	0	mg/cm2	0.4	Negative	1	2	12/2/2023	22:39:20	zburnelle	Action Level	Lead Paint
11	-0.2	mg/cm2	0.4	Negative	1	2	12/2/2023	22:40:43	zburnelle	Action Level	Lead Paint
12	-0.1	mg/cm2	0.4	Negative	1	2	12/2/2023	22:41:39	zburnelle	Action Level	Lead Paint
13	-0.2	mg/cm2	0.4	Negative	1	2	12/2/2023	22:42:19	zburnelle	Action Level	Lead Paint
14	-0.1	mg/cm2	0.4	Negative	1	2	12/2/2023	22:44:18	zburnelle	Action Level	Lead Paint
15	0	mg/cm2	0.4	Negative	1	2	12/2/2023	22:46:27	zburnelle	Action Level	Lead Paint
16	0.1	mg/cm2	0.4	Negative	1	2	12/2/2023	22:47:50	zburnelle	Action Level	Lead Paint
17	-0.1	mg/cm2	0.4	Negative	1	2	12/2/2023	22:48:28	zburnelle	Action Level	Lead Paint
18	0.1	mg/cm2	0.4	Negative	1	2	12/2/2023	22:49:17	zburnelle	Action Level	Lead Paint
19	0.1	mg/cm2	0.4	Negative	1	2	12/2/2023	22:50:59	zburnelle	Action Level	Lead Paint
20	-0.1	mg/cm2	0.4	Negative	1	2	12/2/2023	22:51:35	zburnelle	Action Level	Lead Paint
21	-0.1	mg/cm2	0.4	Negative	1	2	12/2/2023	22:52:14	zburnelle	Action Level	Lead Paint
22	-0.1	mg/cm2	0.4	Negative	1	2	12/2/2023	22:53:09	zburnelle	Action Level	Lead Paint
23	-0.2	mg/cm2	0.4	Negative	1	2	12/2/2023	22:53:58	zburnelle	Action Level	Lead Paint
24	-0.1	mg/cm2	0.4	Negative	1	2	12/2/2023	22:54:39	zburnelle	Action Level	Lead Paint

XRF Paint Analyzer Data Sheet
(Part 1)
104 W Street
Eureka, CA

25	0.1	mg/cm2	0.4	Negative	1	2	12/2/2023	22:56:26	zburnelle	Action Level	Lead Paint
26	-0.1	mg/cm2	0.4	Negative	1	2	12/2/2023	22:57:05	zburnelle	Action Level	Lead Paint
27	-0.2	mg/cm2	0.4	Negative	1	2	12/2/2023	22:57:44	zburnelle	Action Level	Lead Paint
28	-0.4	mg/cm2	0.4	Negative	1	2	12/2/2023	22:58:32	zburnelle	Action Level	Lead Paint
29	0.1	mg/cm2	0.4	Negative	1	2	12/2/2023	22:59:23	zburnelle	Action Level	Lead Paint
30	0.8	mg/cm2	0.3	Negative	1	5	12/2/2023	23:00:00	zburnelle	Action Level	Lead Paint
31	0.4	mg/cm2	0.4	Negative	1	2	12/2/2023	23:03:11	zburnelle	Action Level	Lead Paint
32	0	mg/cm2	0.4	Negative	1	2	12/2/2023	23:03:59	zburnelle	Action Level	Lead Paint
33	0	mg/cm2	0.4	Negative	1	2	12/2/2023	23:04:43	zburnelle	Action Level	Lead Paint
34	-0.1	mg/cm2	0.4	Negative	1	2	12/2/2023	23:06:01	zburnelle	Action Level	Lead Paint
35	-0.1	mg/cm2	0.4	Negative	1	2	12/2/2023	23:06:44	zburnelle	Action Level	Lead Paint
36	0.1	mg/cm2	0.4	Negative	1	2	12/2/2023	23:07:27	zburnelle	Action Level	Lead Paint
37	0.3	mg/cm2	0.4	Negative	1	2	12/2/2023	23:08:35	zburnelle	Action Level	Lead Paint
38	0.3	mg/cm2	0.4	Negative	1	2	12/2/2023	23:09:20	zburnelle	Action Level	Lead Paint
39	0	mg/cm2	0.4	Negative	1	2	12/2/2023	23:11:00	zburnelle	Action Level	Lead Paint
40	0.1	mg/cm2	0.4	Negative	1	2	12/2/2023	23:11:51	zburnelle	Action Level	Lead Paint
41	2.3	mg/cm2	0.4	Positive	1	2	12/2/2023	23:12:36	zburnelle	Action Level	Lead Paint
42	10.9	mg/cm2	0.4	Positive	1	2	12/2/2023	23:13:23	zburnelle	Action Level	Lead Paint
43	-0.1	mg/cm2	0.4	Negative	1	2	12/2/2023	23:14:14	zburnelle	Action Level	Lead Paint
44	0	mg/cm2	0.4	Negative	1	2	12/2/2023	23:15:07	zburnelle	Action Level	Lead Paint
45	0.5	mg/cm2	0.4	Negative	1	3	12/2/2023	23:17:42	zburnelle	Action Level	Lead Paint
46	0.4	mg/cm2	0.4	Negative	1	2	12/2/2023	23:18:50	zburnelle	Action Level	Lead Paint
47	-0.2	mg/cm2	0.4	Negative	1	2	12/2/2023	23:21:03	zburnelle	Action Level	Lead Paint
48	0.1	mg/cm2	0.4	Negative	1	2	12/2/2023	23:21:46	zburnelle	Action Level	Lead Paint
49	0.1	mg/cm2	0.4	Negative	1	2	12/2/2023	23:22:25	zburnelle	Action Level	Lead Paint
50	0.1	mg/cm2	0.4	Negative	1	2	12/2/2023	23:23:14	zburnelle	Action Level	Lead Paint
51	0	mg/cm2	0.4	Negative	1	2	12/2/2023	23:24:09	zburnelle	Action Level	Lead Paint
52	1	mg/cm2	0.3	Positive	1	5	12/2/2023	23:25:50	zburnelle	Action Level	Lead Paint
53	1.1	mg/cm2	0.3	Positive	1	5	12/2/2023	23:27:07	zburnelle	Action Level	Lead Paint
54	1	mg/cm2	0.3	Positive	1	5	12/2/2023	23:28:23	zburnelle	Action Level	Lead Paint

XRF Paint Analyzer Data Sheet
(Part 2)
104 W Street
Eureka, CA

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

Reading #	Concentration	Units	3 SD	Result	Action Level	NomSecs	Date	Time	User	Mode	Analytic Mode
1B	1	mg/cm2	0.3	Positive	1	5	12/10/2023	16:45:13	zburnelle	Action Level	Lead Paint
2B	1	mg/cm2	0.3	Positive	1	5	12/10/2023	16:46:42	zburnelle	Action Level	Lead Paint
3B	1	mg/cm2	0.3	Positive	1	5	12/10/2023	16:48:02	zburnelle	Action Level	Lead Paint
4B	-0.3	mg/cm2	0.4	Negative	1	2	12/10/2023	16:51:38	zburnelle	Action Level	Lead Paint
5B	0	mg/cm2	0.4	Negative	1	2	12/10/2023	16:52:24	zburnelle	Action Level	Lead Paint
6B	-0.1	mg/cm2	0.4	Negative	1	2	12/10/2023	16:53:54	zburnelle	Action Level	Lead Paint
7B	-0.1	mg/cm2	0.4	Negative	1	2	12/10/2023	16:55:26	zburnelle	Action Level	Lead Paint
8B	0	mg/cm2	0.4	Negative	1	2	12/10/2023	16:58:40	zburnelle	Action Level	Lead Paint
9B	0	mg/cm2	0.4	Negative	1	2	12/10/2023	16:59:48	zburnelle	Action Level	Lead Paint
10B	0	mg/cm2	0.4	Negative	1	2	12/10/2023	17:04:15	zburnelle	Action Level	Lead Paint
11B	0.7	mg/cm2	0.3	Negative	1	5	12/10/2023	17:05:16	zburnelle	Action Level	Lead Paint
12B	-0.1	mg/cm2	0.4	Negative	1	2	12/10/2023	17:06:53	zburnelle	Action Level	Lead Paint
13B	0.6	mg/cm2	0.3	NULL	1	4	12/10/2023	17:07:43	zburnelle	Action Level	Lead Paint
14B	0.5	mg/cm2	0.3	Negative	1	3	12/10/2023	17:11:16	zburnelle	Action Level	Lead Paint
15B	9.2	mg/cm2	0.4	Positive	1	2	12/10/2023	17:12:52	zburnelle	Action Level	Lead Paint
16B	-0.3	mg/cm2	0.4	Negative	1	2	12/10/2023	17:14:06	zburnelle	Action Level	Lead Paint
17B	0.2	mg/cm2	0.4	Negative	1	2	12/10/2023	17:14:58	zburnelle	Action Level	Lead Paint
18B	0.1	mg/cm2	0.4	Negative	1	2	12/10/2023	17:17:08	zburnelle	Action Level	Lead Paint
19B	6.9	mg/cm2	0.4	Positive	1	2	12/10/2023	17:18:20	zburnelle	Action Level	Lead Paint
20B	-0.1	mg/cm2	0.4	Negative	1	2	12/10/2023	17:19:10	zburnelle	Action Level	Lead Paint
21B	-0.1	mg/cm2	0.4	Negative	1	2	12/10/2023	17:20:02	zburnelle	Action Level	Lead Paint
22B	1.2	mg/cm2	0.3	Positive	1	5	12/10/2023	17:20:56	zburnelle	Action Level	Lead Paint
23B	7	mg/cm2	0.4	Positive	1	2	12/10/2023	17:22:32	zburnelle	Action Level	Lead Paint
24B	0.8	mg/cm2	0.3	Negative	1	5	12/10/2023	17:24:07	zburnelle	Action Level	Lead Paint

XRF Paint Analyzer Data Sheet
(Part 2)
104 W Street
Eureka, CA

25B	1.1	mg/cm2	0.3	Positive	1	5	12/10/2023	17:27:58	zburnelle	Action Level	Lead Paint
26B	1.1	mg/cm2	0.3	Positive	1	5	12/10/2023	17:29:19	zburnelle	Action Level	Lead Paint
27B	0.9	mg/cm2	0.3	Negative	1	5	12/10/2023	17:30:39	zburnelle	Action Level	Lead Paint

APPENDIX C

NESHAP Notification Form

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

COMPLIANCE ADVISORY
ASBESTOS NESHAP APPLICABILITY
TO DEMOLITION AND RENOVATION PROJECTS

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

Definitions

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

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

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

Prior to commencing any activity, a California Certified Asbestos Consultant (CAC) must complete a thorough inspection for the presence, quantity and categories of asbestos-containing material (ACM). [Asbestos Survey]
Is the quantity of Regulated Asbestos Containing Material (RACM) to be disturbed at least; 260 linear feet, 160 square feet, or 35 cubic feet?
No
Yes
Is the project a DEMOLITION (the unweighting of any load-bearing structural member of the building)? -- OR -- The intentional burning for fire training purposes?
No
Yes
You are only required to perform an asbestos survey prior to initiation of work.
Go to PAGE 3

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 <u>Demolition</u>** 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 <u>after</u> 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.

<u>IN NO EVENT SHALL A PROJECT START ON A DATE OTHER THAN THE DATE CONTAINED IN THE WRITTEN NOTIFICATION.</u>

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

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

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

ASBESTOS DEMOLITION AND RENOVATION NOTIFICATION FORM
GENERAL INFORMATION

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

This notification should be typewritten and postmarked or delivered no later than ten days prior to the beginning of the asbestos removal activity (dates specified in Section VIII) or demolition (dates specified in Section IX). Please submit the form, along with the appropriate fee, to: **NORTH COAST UNIFIED AQMD**
707 L STREET, EUREKA, CA 95501

INSTRUCTIONS:

I. Type of Notification: Enter "O" if the notification is a first time or original notification, "R" if the notification is a revision of a prior notification, or "C" if the activity has been cancelled.

II. Facility Information: Enter the names, addresses, contact persons and telephone numbers of the following:
   Owner: Legal owner of the site at which asbestos is being removed or demolition planned
   Asbestos Removal Contractor: Certified asbestos contractor hired to remove asbestos (include DOSH registration #)
   Other Demolition or Renovation Operator: Demolition contractor, general contractor, or other person who leases, operates, controls, or supervises the site (fire dept if training burn).

III. Type of Operation: Enter "D" for facility demolition, "R" for facility renovation, "O" for ordered demolition, or "E" for emergency renovation. Fire training burns are considered facility demolitions ("D").

IV. Is Asbestos Present?: Answer "yes" or "no" regardless of the amount of asbestos present.

V. Facility Description: Provide detailed information on the areas being renovated or demolished. If applicable, provide the floor numbers and room numbers where renovations are to be conducted.
   Site Location: Provide information needed to locate site in event that the address alone is inadequate.
   Building Size: Provide in square meters or square feet.
   No. of Floors: Enter the number of floors including basement or ground floors.
   Age in Years: Enter approximate age of the facility.
   Present Use / Prior Use: Describe the primary use of the facility or enter the following codes: H - hospital; S - school; P - public building; O - office; I - industrial; U - university or college; B - ship; C - commercial; or R - residential.

VI. Asbestos Detection Procedure: Describe methods and procedures used to determine whether asbestos is present at the site, including a description of the analytical methods employed. **Building inspections must be performed by an AHERA-accredited Building Inspector** (40 CFR 763, Subpart E, App. C). Include copy of current accreditation. If an inspection report has been prepared by a consultant for the facility please include a copy with the notification.

VII. Approximate Amount of Asbestos, Including: (1) Regulated asbestos containing material (RACM) to be removed (including nonfriable ACM to be sanded, ground, or abraded); (2) Category I ACM not removed ; and (3) Category II ACM not removed. For both removals and demolition, enter the amount of RACM to be removed by entering a number in the appropriate box and an "X" for the unit. For demolition only, enter the amount of Category I and II nonfriable asbestos not to be removed in the appropriate boxes. Category I nonfriable material includes packing, gasket, resilient floor covering, and asphalt roofing materials containing more than one percent asbestos. Category II nonfriable material includes any material, excluding Category I products, containing more than one percent asbestos, that when dry, cannot be crumbled, pulverized, or reduced to powder. Facilities to be used for fire training purposes must have all materials containing more than one percent asbestos removed.

VIII. Scheduled Dates of Asbestos Removal: Enter scheduled dates (month/day/year) for asbestos removal work. Asbestos removal work includes any activity, including site preparation, which may break up, dislodge, or disturb asbestos material. **These dates must be accurate.** Asbestos removal work occurring prior to the start date or after the end date is a violation and could result in substantial enforcement action. If these dates change, notify the District immediately, by submitting a revision request form.

IX. Scheduled Dates of Demo/Renovation: Enter scheduled dates (month/day/year) for beginning and ending of the planned demolition or renovation. For fire training burns this is the time period when the actual fire training burn will take place. **These dates must be accurate.** Demolition or renovation activity occurring prior to the start date or after the end date is a violation and could result in substantial enforcement action. If these dates change, notify the District immediately, by submitting a revision request form.

X. Description of Planned Demolition or Renovation Work, and Method(s) to be Used: Include here a description of the overall work being done and the techniques being used. A work plan can be attached to address this item.

XI. Description of Engineering Controls and Work Practices to be Used to Control Emissions of Asbestos at the Demolition or Renovation Site: Describe the work practices and engineering controls selected to ensure compliance with the requirements of the regulation, including removal and waste handling emission control procedures. A work plan can be attached to address this item.

XII. Waste Transporter(s): Enter the name, addresses, contact persons and telephone numbers of the persons or companies responsible for transporting ACM from the removal site to the waste disposal site. If the removal contractor or owner is the waste transporter, state "same as owner" or "same as removal contractor".

XIII. Waste Disposal Site: Identify the waste disposal site, including the complete name, location, and telephone number of the facility. If ACM is to be disposed of at more than one site, provide complete information on an additional sheet submitted with the form.

XIV. If Demolition Ordered by a Government Agency: Provide the name of the responsible official, title and agency, authority under which the order was issued, the dates of the order and the dates of the ordered demolition. Include a copy of the order with the notification.

XV. Emergency Renovation Information: Provide the date and time of the emergency, a description of the event and a description of unsafe conditions, equipment damage or financial burden resulting from the event. The information should be detailed enough to evaluate whether a renovation falls within the emergency exception.

XVI. Description of Procedures to be Followed in the Event that Unexpected Asbestos is Found or Previously Nonfriable Asbestos Material Becomes Crumbled, Pulverized, or Reduced to Powder: Provide adequate information to demonstrate that appropriate actions have been considered and can be implemented to control asbestos emissions adequately, including at a minimum, conformance with applicable work practice standards. Typically these will include a work stoppage, wetting of material, and notification to the District.

XVII. Certification of Presence of Trained Supervisor: Certify that a person trained in asbestos removal procedures and the provisions of this regulation will be on-site and supervise the demolition or renovation. **When handling RACM, the supervisor must be a current AHERA-accredited contractor/supervisor, and the workers must be AHERA-accredited workers** (40 CFR 763 Subpart E App. C). The supervisor is responsible for the activity on-site. Evidence that the training has been completed by the supervisor must be available for inspection during normal business hours.

XVIII. Verification: Please certify the accuracy and completeness of the information provided by signing and dating the notification form.

FEES AND OTHER REQUIREMENTS:

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

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

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

NORTH COAST UNIFIED AIR QUALITY MANAGEMENT DISTRICT

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

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

Operator Project #	Postmark	Date Received	Notification #

I. TYPE OF NOTIFICATION Circle One: **O** = Original **R** = Revised **C** = Canceled

II. FACILITY INFORMATION (*Identify owner, removal contractor and any other contractors*)

OWNER NAME:		
Address:		
City:	State:	Zip:
Contact:	Tel:	
ASBESTOS REMOVAL CONTRACTOR:		DOSH Reg #
Address:		
City:	State:	Zip:
Contact:	Tel:	
OTHER DEMOLITION OR RENOVATION OPERATOR:		
Address:		
City:	State:	Zip:
Contact:	Tel:	

III. TYPE OF OPERATION Circle One: **D** = Demolition **O** = Ordered Demolition **R** = Renovation **E** = Emergency Renov.

IV. IS ASBESTOS PRESENT Circle One: (**Y**es **N**o)

V. FACILITY DESCRIPTION (*Include building name, number and floor or room numbers*)

Bldg. Name:			
Address:			
City:	State:	Zip:	County:
Site Location:			
Building Size:	# of Floors:	Age in Years:	
Present Use:		Prior Use:	

VI. PROCEDURE USED TO DETECT THE PRESENCE OF ASBESTOS MATERIAL {An asbestos survey performed by a California "Certified Asbestos Consultant", is required to process this notification}

C.A.C. Certification #	**Certification Experation Date:**

VII. APPROXIMATE AMOUNT OF ASBESTOS, INCLUDING: 1. Regulated ACM to be Removed 2. Category I ACM to be Removed 3. Category II ACM to be Removed	RACM To Be Removed		Nonfriable Asbestos Material To Be Removed		Indicate Unit of Measurement Below	
			Category I	Category II	Units	
Pipes					Ln Ft:	Ln m:
Surface Area					Sq Ft:	Sq m:
Vol. RACM Off Facility Component					Cu Ft:	Cu m:

VIII. SCHEDULED DATES ASBESTOS REMOVAL (*MM/DD/YY*)	**Start:**	**Complete**
IX. SCHEDULED DATES DEMO/RENOVATION (*MM/DD/YY*)	**Start:**	**Complete**

X. DESCRIPTION OF PLANNED DEMOLITION OR RENOVATION WORK, AND METHOD(S) TO BE USED:

District Use Only	**Date Payment Received:**	**Payment Method:**	**Check Number:**	**Amount:**

XI. DESCRIPTION OF WORK PRACTICES AND ENGINEERING CONTROLS TO BE USED TO PREVENT EMISSIONS OF ASBESTOS AT TH DEMOLITION OR RENOVATION SITE (*attach work plan, if appropriate*):

XII. WASTE TRANSPORTER #1		
Name:		
Address:		
City:	State:	Zip:
Contact Person:	Tel:	
WASTE TRANSPORTER #2		
Name:		
Address:		
City:	State:	Zip:
Contact Person:	Tel:	

XIII. WASTE DISPOSAL SITE		
Name:	Tel:	
Address:		
City:	State:	Zip:

XIV. IF DEMOLITION ORDERED BY A GOVERNMENT AGENCY PLEASE IDENTIFY THE AGENCY BELOW (*attach copy of demolition order*):	
Name:	Title
Authority	
Date of Order (*MM/DD/YY*):	Date Ordered to Begin (mm/dd/yy):

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

XVI. DESCRIPTION OF PROCEDURES TO BE FOLLOWED IN THE EVENT THAT UNEXPECTED ASBESTOS IS FOUND, OR PREVIOUSI NONFRIABLE ASBESTOS MATERIAL BECOMES FRIABLE:

XVII. I CERTIFY THAT AN INDIVIDUAL TRAINED IN THE PROVISIONS OF THIS REGULATION (40 CFR PART 61, SUBPART M) WILL BE ON-SITE DURING ALL ASBESTOS ABATEMENT, AND EVIDENCE THAT THE REQUIRED CERTIFICATION ACCOMPLISHED BY THIS PERSON WILL BE AVAILABLE FOR INSPECTION BY REGULATING AUTHORITIES DURING NORMAL BUSINESS HOURS.

(Print Name of Owner/Operator) (Signature of Owner/Operator)

XVIII. I CERTIFY THAT THE ABOVE INFORMATION IS CORRECT.

(Print Name of Owner/Operator) (Signature of Owner/Operator)

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

SINGLE DEMOLITION – OR – RENOVATION PROJECTS . . . . . 2 X

ASBESTOS ABATEMENT <u>accompanying a demolition</u> (Regulation IV, Rule 401, §1.1.2) . . . . . 4 X

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

APPENDIX D

Consultant Certifications

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

Zindar Brunelle
Name

Certification No. 14-5295

Expires on 10/15/24

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.

California Department of PublicHealth

STATE OF CALIFORNIA
DEPARTMENT OF PUBLIC HEALTH

LEAD-RELATED CONSTRUCTION CERTIFICATE

INDIVIDUAL:	CERTIFICATE TYPE:	NUMBER:	EXPIRATION DATE:
Zindar Brunelle	Lead Inspector/Assessor	LRC-00000482	9/2/2024
	Lead Supervisor	LRC-00000481	9/2/2024

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

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

1/4/2023		174753
Class Date(s)		Certificate Number
David Esparza - President	CA-001-06	1/4/2024
	Cal/OSHA Number	Expiration Date

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