

**ASBESTOS SURVEY,
LEAD-BASED PAINT &
PCB INSPECTION REPORT**

**COMMERCIAL BUILDINGS
450 E. BELMONT
FRESNO, CALIFORNIA**

January 19, 2016

PREPARED FOR:

**Mr. Steve Mitchell, Vice President
BMY Construction
5485 E. Olive Avenue
Fresno, California 93727**

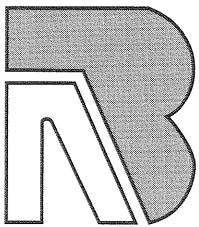
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Roof Consulting / Asbestos, Lead & IAQ Consulting



**T. BROOKS &
ASSOCIATES**

January 19, 2016

Project #16-7726

Mr. Steve Mitchell
Vice President
BMY Construction
5485 E. Olive Avenue
Fresno, California 93727

**SUBJECT: Asbestos Survey, Lead-Based Paint & PCB Inspection Report
Commercial Buildings
450 E. Belmont Avenue
Fresno, CA**

Dear Mr. Mitchell;

In accordance with your request and authorization, **T. Brooks & Associates, Inc.** conducted an Asbestos Survey and Lead-Based Paint Inspection involving the above referenced commercial structures located in Fresno, CA. We also performed a limited PCB investigation involving fluorescent light fixtures. The survey was requested due to planned demolition operations involving the referenced structures.


The Client wishes to be notified as to the presence of asbestos-containing materials and/or lead-based, or lead-containing paint which may impact the proposed demolition operations involving the subject structures.

The enclosed survey results are the culmination of sampling and testing involving the subject structures as conducted on January 12, 2016.

We appreciate the opportunity to assist you. If you should have questions or require additional information, please contact us at (559) 298-9135.

Respectfully,

T. BROOKS & ASSOCIATES, INC.


Troy F. Brooks, CAC, RRC, CIEC
Certified Asbestos Consultant, No. 92-0186
CDPH Inspector/Assessor for Lead, No. 1398
Certified Indoor Environmental Consultant
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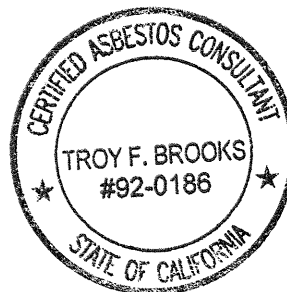


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ASBESTOS SURVEY & LEAD-BASED PAINT INSPECTION REPORT COMMERCIAL BUILDINGS 450 E. BELMONT AVENUE FRESNO, CALIFORNIA

INTRODUCTION

In accordance with your request and authorization, **T. Brooks & Associates, Inc.** has conducted an Asbestos Survey and Lead-Based Paint Inspection involving the above referenced commercial structures located in Fresno, California. The investigation was requested due to proposed demolition operations involving the referenced structures at the subject site. The following sections present a description of the structure, current site use, pertinent regulatory information, description of sampled materials, and analysis of findings and our recommendations specific to compliance with demolition operations.

ASBESTOS INVESTIGATION

OBJECTIVE AND SCOPE OF SERVICES – ASBESTOS

The objective of this investigation was to evaluate suspect building materials at specified interior and exterior areas to be impacted by proposed demolition operations as to asbestos content. The scope of sampling was conducted in accordance with the NESHAP regulation of the U.S.E.P.A., the San Joaquin Valley Air Pollution Control District, and Cal/OSHA requirements. Specific sampling locations were selected by the inspector based on referenced regulatory requirements. Sampling was conducted utilizing destructive techniques. Suspect asbestos-containing materials were characterized by size, color and texture in order to quantify materials and to draw conclusions based on bulk sample results.

Bulk sample analysis was provided by Environmental Management Consultants, an independent, NVLAP accredited laboratory (NVLAP No. 101926-0) located in Phoenix, Arizona and specializing in asbestos analysis. Bulk samples were individually bagged and numbered for identification and to maintain a chain-of-custody as part of this report.

APPLICABLE REGULATIONS

Environmental Protection Agency

The National Emission Standard for Hazardous Air Pollutants (NESHAP), which was promulgated by the Federal Environmental Protection Agency (EPA), identifies "facilities"

T. Brooks & Associates, Inc.

subject to asbestos regulation and requires completion of prescribed procedures including "asbestos surveys" prior to commencement of demolition or renovation activities involving all commercial and certain residential structures.

In addition to the Federal NESHAP standard, other regulations pertaining to asbestos also exist on federal, state, county and local levels. The San Joaquin Valley Air Pollution Control District (SJVAPCD) has been charged with the administration and oversight of these programs in the area of the subject site. The SJVAPCD requires filing of a notification by the Contractor and payment of applicable fees to their agency on all demolition, and renovation projects involving in excess of 160 square feet, 260 linear feet, or 35 cubic feet of "Regulated Asbestos Containing Material" (RACM) which includes all friable materials or non-friable materials in friable condition.

Based on the Subject Site location, the appropriate SJVAPCD region office is the Central Region located at:

1990 E. Gettysburg
Fresno, California
(559) 230-5950

A copy of SJVAPCD documents and standardized forms are included in **Appendix F** for use in complying with their requirements. Due to the voluminous nature of applicable regulations governing work involving disturbance of asbestos-containing materials, copies of applicable regulations have not been included as part of this report. Refer to **Appendix G** (Regulatory Resource List) for additional information related to regulatory compliance which may be obtained by the Client for their use in complying with applicable requirements.

The SJVAPCD requires that all friable, asbestos-containing materials (RACM) be removed prior to engaging in "any" demolition activities which would disturb such materials. In addition, they recommend that all non-friable materials be removed due to the fact that forces associated with normal renovation and demolition operations may render such materials friable. The SJVAPCD, also regulates all operations defined as a "Demolition" under the NESHAP, regardless of whether asbestos is present which will be impacted.

Occupational Safety and Health Administration

The Occupational Safety and Health Administration (OSHA), regulates construction activities including those which involve disturbance of asbestos-containing materials, or suspect ACM. OSHA regulations for asbestos materials exist at both state (Cal-OSHA) and federal (Fed-OSHA) levels and are intended to protect workers from occupational exposures to these materials.

Federal asbestos regulations, including the Federal Construction Industry Asbestos Standard (29 CFR 1926.1101) and State of California Standard (Title 8 CCR 1529) mandate that all construction materials classified as “Thermal System Insulation” (TSI) or “Surfacing Material” (sprayed or troweled in place of an acoustical nature) installed in buildings prior to January 1, 1981, be classified as “Presumed Asbestos Containing Materials” (PACM). This designation may only be refuted by extensive testing procedures of each homogeneous material in compliance with 40 CFR 763 Subpart E, the “ASHERA” regulations of the EPA).

Appropriate controls including air sampling are required during the disturbance of any asbestos containing material (ACM) in order to document any potential airborne fiber release which may expose workers or others to regulated levels of airborne asbestos.

Certified Asbestos Consultant and Site Surveillance Technician

The California Business and Professions Code specifies that only a State of California, Certified Asbestos Consultant may provide design, environmental air sampling and other consulting services on behalf of building owners relating to abatement projects. Certified Site Surveillance Technicians (SST's) typically perform bulk sampling, air monitoring, and other functions under the surveillance of a Certified Asbestos Consultant.

Definition of Asbestos Containing Material

Cal-OSHA	>0.1% by weight *
State of California, Health & Safety Code	>0.1%
Fed-OSHA	>1.0% by weight
Cal-EPA	friable and >1% asbestos
EPA	friable and >1% asbestos

* Under Cal-OSHA regulations, materials containing between 0.01% - 1.0% are classified as “Asbestos Construction Containing Material”. The materials would not be regulated by the EPA and the waste may be disposed of as non-hazardous.

Work Categories - Fed OSHA, 29 CFR 1926.1101 Cal-OSHA, Title 8, CCR 1529

Classify abatement operations under four distinct activities which trigger different provisions within the standard. Those activities presenting the greatest risk are designated Class I work, with decreasing risk potential for each successive class.

The work categories and brief descriptions are as follows:

Class I - Abatement involving thermal system insulation (TSI) and sprayed-on or troweled-on or otherwise applied surfacing ACM.

Class II - Abatement of ACM or PACM other than TSI or Surfacing Materials.
(Typically includes roofing and flooring materials)

Class III - Repair and maintenance operations which are likely to disturb ACM, or

Class IV - Custodial and housekeeping operations where minimal contact with ACM and/or PACM may occur.

Unclassified - Operations involving abatement of materials which contain detectable levels of asbestos up to and including, but not in excess of 1%.

NESHAP regulations are mandated for renovation or demolition activities exceeding the following construction material quantities at each project location:

- > 160 square feet (sf)
- > 260 linear feet (lf)
- > 35 cubic feet (cf)

Refer to referenced EPA and OSHA regulations for additional information regarding specific procedures for demolition or renovation activities. See **Appendix G** for additional information concerning regulatory requirements.

INVESTIGATION

The inspection and sampling event of the subject structures was conducted by Troy F. Brooks, State of California Certified Asbestos Consultant, on January 12, 2016. Professional Certifications and Laboratory Certifications are presented in **Appendix H**.

Building Construction and Use

The referenced structures are of masonry and concrete block construction with supporting wood framing. Interior wall finishes consist of plaster. Exterior finishes include stucco at some locations. A site plan was prepared for our use in documenting sampling locations. The date of construction was not provided for our use.

Materials Sampled

Materials to be sampled were at the discretion of the sampler and were selected based upon the likelihood of containing asbestos as an integral or incidental part of their construction. The sampled materials were intended to represent homogeneous materials present in each distinct sampling area.

Materials selected for sampling and subsequent laboratory analysis included the following:

Project Location: 450 Belmont Avenue, Fresno – Building 1

<u>Sampled Materials</u>	<u>EPA Classification</u>	<u>NESHAP CAT.*</u>
Flooring Materials		
- No Samples Fit Category		
Wall Materials		
- CMU w/ Mortar	Miscellaneous Material	RACM
- Plaster	Miscellaneous Material	RACM
- Plaster w/ Tar	Miscellaneous Material	RACM
- Plaster w/ Texture	Miscellaneous Material	RACM
- 2' x 4' Wall Tile	Miscellaneous Material	RACM
- Ceramic Tile w/ Mortar & Mastic	Miscellaneous Material	RACM
- Ceramic Tile w/ Mortar & Thin Set	Miscellaneous Material	RACM
- Stucco	Miscellaneous Material	RACM
Ceiling Materials		
- 12" x 12" Ceiling Tile w/ Mastic	Miscellaneous Material	Cat. I, N.F.
- Fiberboard w/ Coating	Miscellaneous Material	RACM
- Drywall w/ Mud	Miscellaneous Material	RACM
- Attic Insulation	Miscellaneous Material	RACM
Miscellaneous Materials		
- Window Glazing	Miscellaneous Material	RACM
- Door Gasket	Miscellaneous Material	RACM
- Pipe Insulation	Surfacing Material	RACM
- Masonry	Miscellaneous Material	Cat. II, N.F.
- Masonry w/ Mortar	Miscellaneous Material	RACM
- Roof Wall Flashing	Miscellaneous Material	RACM
- Built-up Roof	Miscellaneous Material	Cat. I, N.F.
- Roof Penetration Mastic	Miscellaneous Material	Cat. I, N.F.
- Exterior Paint	Surfacing Material	RACM

*These classifications are based on classifications by the AHERA regulations of the Environmental Protection Agency. All asbestos-containing materials may be rendered friable by the forces acting upon them.

Sample Results – Building 1

Of those samples submitted for analysis, a total of seven (7) samples included one or more layers which tested positive for asbestos in amounts >1.0%. The samples testing positive for asbestos in amounts >1.0% included: Drywall Taping Mud (2 Samples), Ceiling Insulation (1 Sample), Fiberboard Ceiling Coating (2 Samples), Roof Wall Flashing (1 Sample), Roof Penetration Mastic (1 Sample).

Each sample of drywall which includes asbestos-containing taping mud was reanalyzed by “Point-Count” method as allowed under the NESHAP to accurately determine the asbestos content of the drywall “system”. Based on the “Point Count” analysis, both samples were confirmed as containing asbestos in amounts <1.0%. See “**Analysis of Findings**” for additional information.

Refer to enclosed **Table No. 1 & Table 2** for additional information concerning material descriptions and locations.

Project Location: 450 Belmont Avenue, Fresno – Building 2

<u>Sampled Materials</u>	<u>EPA Classification</u>	<u>NESHAP CAT.*</u>
Ceiling Materials		
Drywall w/ Taping Mud	Miscellaneous Material	RACM
Wall Materials		
- Plaster	Miscellaneous Material	RACM
- CMU w/ Grout/Paint	Miscellaneous Material	RACM
Flooring Materials		
- 12” x 12” Vinyl Floor Tile w/ Mastic	Miscellaneous Material	Cat. I, N.F.**
Miscellaneous Materials		
- Exterior Masonry w/ Mortar	Miscellaneous Material	RACM
- Window Glazing	Miscellaneous Material	RACM
- Exterior Paint	Miscellaneous Material	RACM
- Field of Roof	Miscellaneous Material	RACM

* These classifications are based on classifications by the AHERA regulations of the Environmental Protection Agency. All asbestos-containing materials may be rendered friable by the forces acting upon them.

** Removal of floor tile and/or related mastic using mechanical means would change the classification of the materials to RACM and require compliance with NESHAP requirements.

Sample Results – Building 2

Of those samples submitted for analysis, a total of five (5) samples included one or more layers which tested positive for asbestos in amounts >1.0%. The samples testing positive for asbestos in amounts >1.0% included: Drywall Taping Mud (2 Samples), 12” x 12” VFT Mastic (2 Samples), Roof Field (1 Sample).

Each sample of drywall which includes asbestos-containing taping mud was reanalyzed by “Point-Count” method as allowed under the NESHAP to accurately determine the asbestos

content of the drywall "system". Based on the "Point Count" analysis, both samples were confirmed as containing asbestos in amounts <1.0%. See "**Analysis of Findings**" for additional information.

Refer to enclosed **Table No. 1 & Table 2** for additional information concerning material descriptions and locations.

ANALYSIS OF FINDINGS

Asbestos-containing materials are classified by their "Friability" which is defined as material that when dry may be crumbled, pulverized, or reduced to powder by hand pressure. In addition, the "Friability" classification is not only determined by the nature and condition of the ACM, but also by work practices to which the material may be exposed during renovation activities. The "Friability" classification is critical in determining the applicable regulations, work practices and disposal requirements.

Drywall Taping Mud – w/ Point-Count Analysis

Drywall systems which include asbestos-containing taping mud typically contain less than 1.0% asbestos content as a composite system. Each sample collected at the subject site found to include asbestos-containing taping mud was reanalyzed by "Point-Count" method as allowed under the NESHAP to accurately determine asbestos content of the drywall system. Based on the Point-Count analysis, the drywall systems contain <1.0% asbestos content. Drywall represented by these results would not be considered "Regulated Asbestos Containing Material" (RACM) and may be disposed of as non-hazardous construction debris. Workers engaged in the removal process would be covered by Cal/OSHA regulations governing asbestos related work. Removal of drywall with asbestos content of <1.0% would be an "Unclassified" operation under Cal/OSHA.

Vinyl Floor Tile Mastic

Vinyl floor tile and associated mastic is normally classified as non-friable material in terms of abatement operations, transportation, and disposal. Non-friable materials, when packaged properly, may be disposed of at a local landfill accepting non-friable ACM. Mastic must be in a non-liquid state to be accepted by most landfills.

Under the NESHAP, removal of vinyl floor tile and associated mastic using mechanical means would render the materials friable, changing their status to RACM. Abatement of RACM in amounts exceeding the minimum threshold amounts would require filing of a completed Notification with the SJVAPCD, a ten-day waiting period, transportation by a licensed hazardous waste hauler, and disposal as hazardous waste.

Removal of these materials would be classified as a Class II operation under current OSHA regulations. Notification to the local Cal-OSHA office is required prior to commencement with operations which will disturb these materials.

Asphalt Roof Components- Built-up Roofing

Asphalt based roofing products in intact condition are classified as non-friable in terms of abatement operations. Certain of the roofing materials at the subject property which contain asbestos were observed to be in “poor” condition. Based on their current condition, these materials were determined to be in “friable” condition and are therefore “Regulated Asbestos-Containing Material”. Removal of asphaltic roofing materials would be classified as a Class II operation. Notification to the local Cal-OSHA office is required prior to commencement with operations which will disturb these materials. These materials would not be regulated by the EPA if removal is performed utilizing hand tools and prescribed methods.

Attic Insulation

One sample of attic insulation collected in Building 1 tested positive for regulated quantities of “Amosite” asbestos. Based on the results, all attic insulation consistent with this result is to be considered as asbestos-containing material. Based on its classification as “thermal system insulation” by applicable EPA regulations, abatement of this material would be classified as a “Class I” abatement operation.

Transportation and disposal of “Regulated Asbestos Containing Material” requires the use of a Hazardous Waste Manifest to document proper transportation and disposal. Transportation must be by a hazardous waste hauler licensed in California.

Ceiling Panel Coating

Two (2) samples of coating present on fiberboard ceiling panels tested positive for “Chrysotile” asbestos. Removal of ceiling panels with which includes the coating asbestos would be an “Class 2” activity under Cal/OSHA. Workers engaged in the removal would be covered under applicable OSHA regulations. Based on its current condition, the material was determined to be in “friable” condition and is therefore designated as “Regulated Asbestos-Containing Material” (RACM).

In terms of abatement operations, the asbestos-containing adhesive cannot easily be separated from the fiberboard panels, therefore, both materials should be treated as asbestos-containing in terms of handling and disposal, even if the panels are non-asbestos containing.

Vinyl Floor Tile & Associated Mastic

Vinyl floor tile and associated mastic is normally classified as non-friable material in terms of abatement operations, transportation, and disposal. Non-friable materials, when packaged properly, may be disposed of at a local landfill accepting non-friable ACM. Mastic must be in a non-liquid state to be accepted by most landfills.

Under the NESHAP, removal of vinyl floor tile and associated mastic using mechanical means would render the materials friable, changing their status to RACM. Abatement of RACM in amounts exceeding the minimum threshold amounts would require filing of a completed Notification with the SJVAPCD, a ten-day waiting period, transportation by a licensed hazardous waste hauler, and disposal as hazardous waste.

Removal of these materials would be classified as a Class II operation under current OSHA regulations. Notification to the local Cal-OSHA office is required prior to commencement with operations which will disturb these materials.

ADDITIONAL CONSIDERATIONS

Under the NESHAP, abatement of non-friable ACM is not required unless the proposed renovation and/ or demolition operations would render such materials friable.

Fees to the San Joaquin Valley Air Pollution Control District (SJVAPCD) would be required for abatement work which includes in excess of 160 s.f., 260 l.f., or 35 c.f. of "Regulated Asbestos-Containing Material", or any work classified under the NESHAP as a "demolition", regardless of whether asbestos is present. All proposed abatement and/or demolition operations would require compliance with OSHA and NESHAP regulations and procedures. A mandatory ten-working day waiting period is required by the SJVAPCD prior to proceeding with regulated abatement activities, defined as disturbance of regulated amounts of RACM, or non-friable ACM which becomes friable, as well as "any" demolition, regardless of whether asbestos is present.

REGULATORY AGENCIES AND REQUIREMENTS

Following is a brief description of regulatory agencies and regulatory requirements:

Federal

Environmental Protection Agency (EPA) - NESHAP Notification - 40 CFR 16 - Subpart M

Requires notification in all demolition operations whether the building contains asbestos or not. Requires notification when renovation/demolition involves more than 160 square feet or 260 linear feet of friable ACM, or 35 cubic feet of RACM.

San Joaquin Valley Air Pollution Control District

San Joaquin Valley Air Pollution Control District (SJVAPCD) - Enforcement of NESHAP regulations.

Enforces notification in all demolition operations whether the building contains asbestos or not, and all renovation projects involving in excess of 160 square feet, 260 linear feet, or 35 cubic feet of RACM.

Requires the removal of all regulated ACM before demolition/renovation process. Non-friable Category I and II (ACM may be required to be removed at the discretion of the local air pollution control district. Typically, the SJVAPCD while not requiring abatement of non-friable ACM in intact condition prior to conducting demolition operations, recommends that all ACM including non-friable ACM be abated as forces associated with normal renovation/demolition operations may render such materials friable. This exemption normally does not apply to scheduled burn operations.

Cal-OSHA

State of California, Department of Industrial Relations, Division of Occupational Safety and Health Enforces regulations pertaining to worker protection. New Cal-OSHA standard (8 CCR 1529 (took effect on July 1, 1991) and was adopted from the Federal OSHA standard. The standard mandates procedures and engineering controls necessary to protect employees of the contractor, building occupants and others. Requires filing of a "Temporary Jobsite Notification" with the local compliance office, prior to commencing with abatement activities involving any quantity of material.

RECOMMENDATIONS

Prior to proceeding with any scheduled demolition operation involving the referenced commercial structures at the subject site, have all building materials identified in this report as containing asbestos, and which will be disturbed by activities associated with the proposed demolition operations removed by a qualified, licensed abatement contractor with a demonstrated history of similar projects and regulatory compliance. Insure that all work operations are conducted in accordance with applicable EPA and OSHA requirements. The Contractor should be required to document evidence of current training, licensing and asbestos specific insurance coverage.

Comply with the Notification requirements of the SJVAPCD, and pay required fees. By law, a "demolition" is defined as any operation which removes an intact structural building element, in addition to full-scale demolition operations. Wait the required ten (10) working days after filing the notification before proceeding with the demolition.

Retain the Services of a State of California, Certified Asbestos Consultant. The consultant may provide project design, management, air monitoring and other services, which will ensure compliance with applicable regulations and protect the Building Owner against any

potential liability which may arise as a result of work associated with work operations involving the subject structure.

LEAD-BASED PAINT INSPECTION REPORT

OBJECTIVE AND SCOPE OF SERVICES – LEAD

The inspection and lead sampling event of the subject commercial structure was conducted by Trevor Brooks, Lead Sampling Technician, No. 24304 in the presence of Troy F. Brooks, Inspector/Assessor for Lead, No. 1398. Professional Certifications and Laboratory Certifications are presented in **Appendix H**.

Scope of Investigation

The Lead-Based Paint Inspection was conducted in accordance with Title 17 - California Code of Regulations, Division 1, Chapter 8, 8 CCR 1532.1 (Cal/OSHA). The sampling event was conducted in a manner which provides limited, representative evaluation of painted surfaces at referenced locations at the subject site in accordance with the HUD schedule in Chapter 7 (Lead-Based Paint Inspection) of the "Guidelines for the Evaluation and Control of Lead-Based Paint Hazards in Housing". Testing locations provide an overall representation of painted finishes present at the site. The referenced inspection is representative in nature and is limited based on the limitations of the referenced regulatory standard.

Sampling of painted surfaces for suspect lead-based paint at the specified structure included testing of sixty-three (63) separate testing combinations. The XRF instrument was calibrated prior to and following the prescribed sampling period in accordance with the Performance Characteristic Sheet provided by the manufacturer. Calibration readings are included in the XRF sampling results as the initial and concluding readings and are designated as a "calibrate" reading. The calibration readings were compared to a known concentration of lead using a standard SRM sheet provided by the XRF manufacturer to verify accurate performance of the instrument at the beginning and the conclusion of the sampling episode.

SAMPLE METHODOLOGY

Enclosed results are based on total lead content regardless of the number of paint layers present at each specific test location. Each referenced area includes data generated by the testing instrument. Lead content at a level equivalent to 5,000 ppm would be classified as "Lead-Based Paint" by HUD, The State of California, and the EPA. Each result must also be compared to the applicable OSHA level ("any detectable amount", or 600 ppm), dependent upon the appropriate trigger activity.

T. Brooks & Associates, Inc.

SAMPLING EQUIPMENT

Sampling was conducted using a *Heuresis* Spectrum Analyzer Lead Detector, Model Pb200I Alpha (Serial No. 1029). The instrument was utilized within the operating parameters established by *Heuresis Corporation* as indicated in the Performance Characteristic Sheet.

Definition of Lead Based Paint

Title X	>1.0 mg/cm ² or >0.5% by weight
HUD	1.0 mg/cm ² or 0.5% by weight
CDPH	1.0 mg/cm ² or > 0.5 % by weight
CPSC	600 ppm or .06% by weight
OSHA	600 ppm or .06% by weight or any detectable amount

(Note subtle differences dependent upon preceding mathematical symbols)

APPLICABLE REGULATIONS FOR LEAD

The following includes the primary agencies which govern lead related work and a brief list of their components and responsibilities.

Occupational Safety and Health Administration

Federal Standards	General Industry Standard	29 CFR 1910.1025
	Construction Industry Standard	29 CFR Part 1926.62
State Standards	General Industry Standards	8 CCR 5216
	Construction Industry Standards	8 CCR 1532.1

The Occupational Safety and Health Administration (OSHA), is focused on protecting the health and safety of workers, including construction activities which disturb lead containing paints, surface coatings, and other materials. OSHA regulations for lead materials exist at both state (Cal-OSHA) and federal (Fed-OSHA) levels and are intended to protect workers from occupational exposures to these materials.

Federal and State lead regulations, including the Lead in Construction Standard 29 CFR 1926.62 (Federal Standard) and Title 8 CCR 1532.1, (California standard) regulate disturbance of lead containing materials during construction, demolition, and maintenance related activities. The Federal standard was adopted in May of 1993. The State of California adopted this standard in November 1993.

Appropriate engineering controls, personal protective equipment, training, specific work practices, and representative air sampling are required by both Cal/OSHA and OSHA whenever

workers will disturb lead in any concentration (including less than 600 ppm) as this disturbance may result in airborne exposures over the Action Limit (AL) or Permissible Exposure Limit (PEL). Initial blood lead testing is required above the AL (30 ug/m;), and a written site specific "Compliance Plan" is required for all projects where a Negative Exposure Assessment has not been generated. Medical removal is required for any worker whose blood lead level > 50 ug/dl.

U.S. Environmental Protection Agency

Title X was promulgated by the U.S. Congress in 1992 and required the U.S. Environmental Protection Agency (USEPA), to define lead hazards and to develop certification programs.

Major components of EPA pertaining to Lead Containing Materials

- Established a lab accreditation program
- Defined hazards in dust and soil (revised June 1998)
- Evaluates inspection & removal products (ongoing)
- Requires disclosure & information prior to sale/rental of pre-1978 housing (in effect)
- Mandate information for renovation /remodel work (in effect 6/99)
- Developed an accreditation and training program effective in states that do not have their own program California Environmental Protection Agency

Cal-EPA determines when lead paint waste is a hazardous waste in California, and how it must be disposed. The California Department of Toxic Substance Control (DTSC), as part of Cal-EPA oversees regulated disposal issues related to hazardous waste in California.

Procedures for the identification, management, transport, record keeping, and disposal of all types of hazardous waste are set forth in Title 22, CCR, Sections 66260.1-66263.12 and 66268.1-66268.124, and the Health and Safety Code, section 25163, subdivision (c).

Department of Housing and Urban Development (HUD)

Developed regulations and guidance documents for use on HUD properties. Its Guidelines are generally considered state-of-the-art in the lead abatement industry. HUD guidelines establish strategies for completion of lead survey and risk assessments, clearance strategies, work practices, engineering controls and worker safety procedures.

While HUD guidance documents were developed specifically for HUD properties, both the California DPH work practice regulations and the EPA Model Accreditation Program for lead mandate you follow HUD Guideline procedures in many facilities.

HUD developed the following guidance documents which are industry standards:

- 1989 - published A Lead-based Paint: Interim Guidelines for Hazard Identification and Abatement in Public and Indian Housing, referred to as the "Old HUD Guidelines".
- 1995 - published "Guidelines for the Evaluation and Control of Lead-Based Paint Hazards in Housing".

California Department of Public Health (CDPH)

Developed and enforces a comprehensive regulation that provides an accreditation process for lead training providers, a certification program for individuals, and specified required work practices for lead hazard evaluations and lead hazard control work.

- Promulgated the California CDPH Lead Training, Accreditation, Certification and Work Practices - Title 17, CCR, Division 1, Chapter 8, (Sections 35000-361000). Specifies work practices involved in lead inspections, risk assessments and hazard reduction work in all residential and public buildings in California. Also requires training, passage of exams, and certification of individuals that conduct lead hazard assessments or work to reduce or eliminate lead hazards. Revised standard took effect on January 8, 1999.

Key Provisions: Defines "lead hazards" in dust, paint, and soil
 Defines almost all paint as "presumed" LBP
 Excludes post 1978 housing, and schools built after 1992
 Requires notifications to CDPH prior to disturbance of LBP
 Requires specific work practices (containment, clearance testing, etc.)
 Requires individuals to be "certified" for some work

CDPH Certification is required in the following cases:

- Exceed PEL in California (50 ug/m³) (Cal-OSHA)
- Conduct lead hazard evaluation or "abatement" (CDPH)
- Residential Inspections for EPA Disclosure Rule compliance
- Title X funded projects (U.S. Congress)
- California public elementary and preschools (Ed. Code Section 32243 b)
- When prescribed by project specifications.

CDPH Certification Classifications

Brief Description

Lead Related Inspector/Assessor	Conduct inspections or assessments for LBP
Lead Related Supervisor	Supervise lead project as Contractor
Lead Related Project Monitor	Monitor lead project on behalf of Client
Lead Related Project Designer	Design a lead abatement project
Lead Related Worker	Engage in lead related work as a worker

OSHA Trigger Activities (Tasks):

Fed OSHA, 29 CFR 1926.62
Cal-OSHA, Title 8, CCR 1532.1

Classify trigger tasks under three distinct activity groups which assume that you may reach specified airborne exposure levels. Those tasks presenting the least risk are designated Activity 1 tasks, with increasing risk potential for each successive class.

The three (3) trigger task categories and assumed airborne levels are as follows:

Trigger Activity I - (50 -500 ug/m ³)	manual demolition, scraping and sanding, using heat guns, using HEPA equipment, debris cleanup
Trigger Activity II - (500 - 2500 ug/m ³)	lead mortar, burning, rivet busting, use of non-HEPA equipment, dry abrasive blast cleanup
Trigger Activity III - (>2500 ug/m ³)	welding, abrasive blasting, torch cutting, and burning

Prior to obtaining exposure assessment for each specific trigger task or if no historic data is available, the following apply:

- assume exposure over “PEL”
- wear respirators and protective clothing
- be properly trained per state and federal requirements
- have initial blood tests on affected workers, supervisors

Refer to **Appendix G** – “Regulatory Resource List” for specific information regarding trigger task activities and specific requirements.

ANALYSIS OF FINDINGS – LEAD

In summary, some of the testing combinations considered as part of our limited investigation were found to contain lead in some amount. Under current Cal/OSHA regulations, paint containing in excess of 0.06% lead (600 parts per million) are considered lead-containing

paint for non-trigger tasks under Cal/OSHA. For trigger tasks, any detectable amount of lead invokes Cal/OSHA regulations and assumes that airborne levels may exceed the “Action Level” (AL) of 30 ug/m³, and the “Permissible Exposure Limit” (PEL) of 50 ug/m³. Refer to **Appendix G** for additional information concerning regulatory requirements.

Current OSHA regulations require that workers involved in work disturbing lead containing surfaces be protected from exposure to lead above stipulated levels. Refer to the enclosed OSHA Construction Standard (CCR Title 8 1532.1 California Lead-In-Construction Standard) for work guidelines and requirements.

Of those testing combinations considered as part of our investigation, a total of sixteen (16) were found to include lead in excess of the 1.0 mg/cm², (0.5%), (5,000 ppm) and would be classified as “Lead-Based Paint” (LBP) under state and federal regulations. Refer to **Appendices B-D** for additional information concerning specific Testing Combinations.

Building materials represented by those testing combinations found to include lead in excess of 1.0 mg/cm², (0.5%), (5,000 ppm) are classified as “Lead-Based Paint” (LBP) for the purposes of compliance with state and federal regulations. In addition, Cal/OSHA regulates all activities involving the disturbance of paint which includes “any detectable” amount of lead.

Any construction related work which will disturb building elements which include paint or surface coatings determined to include lead must be conducted in accordance with applicable local, state and federal regulations governing disturbance of lead. A lead waste characterization is required under state and federal requirements prior to disposing of lead-containing waste.

Refer to **Appendices B-D** for additional information concerning specific testing combinations.

Any construction related work which will disturb building elements which include paint or surface coatings determined to include “Lead-Based Paint” must be conducted in accordance with applicable local, state and federal regulations governing disturbance of lead. A lead waste characterization is required prior to disposing of ceramic tile, or the material must be disposed of as lead-containing waste.

PAINT CONDITION

As part of the Lead-Based Paint Inspection, painted surfaces were visually examined for general condition. While this report does not constitute a lead “Risk Assessment”, painted surfaces were generally categorized as being in intact, fair, poor, or peeling condition.

Of the sixteen (16) testing combinations found to include lead in an amount classified as “Lead-Based Paint”, twelve (12) were found to be in “Intact” condition. In addition (3 were found to be in “Not-Intact – Poor” condition. Painted finishes classified as “Lead-Based Paint” and determined to be in “Not-Intact - Fair” or “Not-Intact – Poor” condition are classified by the State of California, Department of Public Health as a “Lead Hazard”.

Refer to the **Appendices B-D** for additional information concerning locations of testing combinations determined to be a “Lead Hazard”.

ADDITIONAL CONSIDERATIONS

Should a full evaluation of potential lead hazards be desired involving testing for lead contaminated dust and soil, we recommend that a “Risk Assessment” be conducted by a certified Lead-based paint Risk Assessor as part of a complete lead hazard evaluation.

Hazards associated with lead exposure are typically due to ingestion and inhalation of lead in the form of dust. Lead can be determined within the bloodstream, bones, and other organs by various detection methods.

Potential exposure to lead is associated with damaged painted surfaces. Painted surfaces should be inspected regularly and maintained in intact, undamaged condition to minimize the potential for the creation of lead dust hazards. Any evidence of peeling, loose or detached paint should be rectified by stabilizing the painted surface or replacing the painted element.

PCB INVESTIGATION STUDY AND CHARACTERIZATION

Our investigation included a study of possible PCB-containing light ballasts in fluorescent light fixtures and high intensity discharge bulbs at interior and exterior areas of the referenced subject structure. Due to the height of the ceilings, no direct examination of the light fixtures was possible. Therefore, the light fixtures were assumed to contain PCB-light ballasts based on the age of the buildings. Our investigation was limited to visual identification and did not include physical sampling of light ballasts. Under normal circumstances, light ballasts which do not contain PCB-containing compounds include language indicating such. Our investigation was limited to referenced potential PCB-containing elements, including light ballasts and did not include other electrical equipment at the subject site.

USE OF POLYCHLORINATED BIPHENYLS (PCB'S)

Polychlorinated Biphenyl was formerly used as insulating fluid in transformers, capacitors, ballasts, and other electrical equipment. In general, these products were utilized up until 1978. Upon emptying electrical equipment, PCB may remain as a trace contaminant in the equipment, in turn to be found in the replacement fluid. PCB's can also be found in trace amounts in liquid residues that may accumulate normally in some natural gas pipelines.

Two additional State of California, Proposition 65 elements defined as "chemicals known to cause cancer or reproductive toxicity" may be present as trace elements within PCB compounds and may be present in soot and smoke involving electrical equipment which contains PCB's. These include Polychlorinated dibenzo-p-dioxins (PCDD) and polychlorinated dibenzofurans (PCDF).

CLASSIFICATION

The Department of Toxic Substances Control (DTSC) has classified polychlorinated biphenyls (PCB's) as a hazardous waste when the concentrations are equal to or greater than 5 mg/l in liquids or when the total concentrations are equal or greater than 50 ppm, respectively. When the total concentrations of PCB's are equal to or greater than 5,000 ppm in water, DTSC then regulates this waste as an Extremely Hazardous Waste (Title 22, CCR, 66261.11.113). The Office of Environmental Health Hazard Assessment is the primary agency concerning Proposition 65 Regulations. They can be reached at (916) 445-6900.

COMPARISON OF CALIFORNIA/U.S. EPA REGULATIONS

- With few exemptions, the U.S. EPA does not regulate liquids with PCB concentrations below 50 ppm. In California, however, liquid wastes with PCB concentrations equal to or greater than 5 ppm are classified as hazardous waste.
- Under U.S. EPA regulations, drained PCB-contaminated transformer carcasses are allowed to be disposed of in municipal landfills. California has classified drained waste transformer carcasses as hazardous waste if the oil that was drained from the carcasses had transformer oil with PCB concentrations equal to or greater than 5 ppm.
- There is no exemption under California DTSC regulation due to PCB quantity or size of the waste material that contains PCB's. Items such as fluorescent light ballasts with PCB capacitors are covered under California DTSC Regulations. Whereas Federal regulations would exempt them under the TSCA small capacitor definition.
- Individual states, including California do not have the right or authority to regulate use of PCB's. Therefore, there are not DTSC regulations that would require removal of an item that contained PCB's such as a transformer or fluorescent light ballast. Generators, however would still have to comply with appropriate Federal removal requirements if applicable. DTSC hazardous waste regulations apply only when and if material(s) which contain PCB's *becomes a waste*.

In the State of California, burning of used oil that contains PCB's above their detection limit (≥ 2 ppm) can only be done at DTSC-authorized facilities that have also met Federal requirements for this type of activity as outlined in Division 40 of the Code of Federal Regulations (9 CFR, Part 761).

FINDINGS – PCB CONTAINING LIGHT BALLASTS

During the course of our limited visual investigation, suspect PCB containing light ballasts were observed within specified areas of the building considered as part of our investigation. The total number of assumed PCB ballasts within the subject structure were as follows:

- Sixty (60) suspect PCB ballasts – Location Room 1 of Building 1

RECOMMENDATIONS

Prior to proceeding with demolition operations involving the subject structures, a lead waste characterization is to be conducted to determine the appropriate waste stream for each structure based state and federal regulations.

The Contractor engaged in the work must conduct an "Initial Exposure Assessment" for each planned "trigger task" in accordance with Cal/OSHA regulations to determine potential lead exposures to workers. Prior to commencing such operations, the Contractor must assume workers will be exposed to airborne levels above the PEL and must provide workers with Hazard Communication Training, and personal protective equipment, including HEPA-equipped respirators. A hand-washing facility must be present at the worksite.

To reduce potential liability, the Owner may elect to have a certified lead professional conduct perimeter air monitoring on their behalf to provide documentation of airborne lead levels at locations around the site. The lead professional may also provide baseline and/or lead clearance monitoring.

Dependent upon the result, a SW846 (STLC) may be required to determine the amount of leachable lead. These tests will determine transportation and disposal requirements and may greatly impact the ultimate cost of the work. Due to potential delays associated with conducting the analysis of the waste, it is recommended that the waste characterization be initiated prior to soliciting bids for the work.

LIMITATIONS

The enclosed asbestos, lead and PCB survey was limited in scope and included only the referenced structure at the subject site. This investigation is undertaken with the calculated risk that the presence, full nature, and extent of asbestos, lead or PCB-containing materials would not be revealed by visual observation and random sampling alone. T. Brooks & Associates, Inc. makes no representations as to the asbestos or lead content of materials which were not specifically tested or which were not readily accessible to the inspector.

The enclosed findings and recommendations are not intended to represent materials at locations other than those specifically referenced. Certain opinions and recommendations expressed in this report are based on our knowledge and experience with applicable state, federal and local law, and do not reflect other possible adverse conditions not immediately visible or which may be discovered by a more extensive examination including a review of relevant documents which were not available during this investigation.

Our inspection did not include sampling of materials which may contain materials known to be hazardous including polychlorinated biphenyls (PCB's), mercury, radon or other materials. Consideration should be given to testing for these and other hazardous materials which may be present. Findings presented in this report were based on field observations, random sampling and analysis, review of available data and discussion with local regulatory and advisory agencies. Therefore, the data obtained are clear and accurate only to the degree implied by the sources and methods involved.

The information presented herewith was based on professional interpretation using presently accepted methods with a degree of conservation deemed proper as of the report date. It is not warranted that such data and/or methods cannot be superseded by future technical developments.

Respectfully Submitted,
T. Brooks & Associates, Inc.,



Troy F. Brooks, CAC, RRC, CIEC
Certified Asbestos Consultant, No. 92-0186
CDPH Lead Inspector/Assessor, No. 1398
Certified Indoor Environmental Consultant

Table 1

Sampled Materials Analytical Results for Asbestos

TABLE 1

SAMPLED MATERIALS ANALYTICAL RESULTS

Commercial Buildings 450 East Belmont Avenue Fresno, California

Client ID	Layer	Material Description	Sample Location	Analytical Results
Building 1				
1-01	1-2	Plaster	Room 1 - North Wall	None Detected
1-02	1-2	Plaster	Room 1 - South Wall	None Detected
1-03	1-3	Plaster & Tar	Room 5 - South Wall	None Detected
1-04	1-2	Plaster	Room 5 - West Wall	None Detected
1-05	1-3	Plaster & Texture	Room 7 - Column	None Detected
1-06	1-2	Plaster	Room 6 - West Wall	None Detected
1-07	1-2	Plaster	Room 1 - Ceiling	None Detected
2-01	1-2	12" x 12" Ceiling Tile & Mastic	Room 3 - Ceiling	None Detected
2-02	1-2	12" x 12" Ceiling Tile & Mastic	Room 4 - Ceiling	None Detected
3-01	1	2' x 4' Wall Tile	Room 3 - Wall	None Detected
3-02	1	2' x 4' Wall Tile	Room 3 - Wall	None Detected
4-01	1	Drywall	Room 2 - Ceiling	None Detected
	2	Taping Mud	Room 2 - Ceiling	3% Chrysotile
	3	Drywall & Taping Mud Composite	Room 2 - Ceiling	<1% Chrysotile
4-02	1	Drywall	Room 2 - Ceiling	None Detected
	2	Taping Mud	Room 2 - Ceiling	3% Chrysotile
	3	Drywall & Taping Mud Composite	Room 2 - Ceiling	<1% Chrysotile
5-01	1	Ceiling Insulation	Room 2 - Ceiling	3% Amosite
5-02	1-2	Ceiling Insulation & Wrap	Room 2 - Ceiling	None Detected

Table 1 - Continued

Client ID	Layer	Material Description	Sample Location	Analytical Results
Building 1 (Continued)				
6-01	1-3	Ceramic Tile, Mortar & Mastic	Room 1 - Wall	None Detected
6-02	1-3	Ceramic Tile, Mortar & Thin Set	Room 5 - Wall	None Detected
7-01	1-2	CMU & Mortar	Room 3 - Wall	None Detected
7-02	1-2	CMU & Mortar	Room 4 - Wall	None Detected
8-01	1	Window Glazing	Room 4	None Detected
8-02	1	Window Glazing	Room 4	None Detected
9-01	1	Door Gasket	Room 7 - Entry	None Detected
9-02	1	Door Gasket	Room 7 - Entry	None Detected
10-01	1	Pipe Insulation	Room 4	None Detected
10-02	1	Pipe Insulation	Room 4	None Detected
11-01	1	Fiber Board Coating	Room 7 - Ceiling	2% Chrysotile
	2-3	Fiber Board	Room 7 - Ceiling	None Detected
11-02	1	Fiber Board Coating	Room 7 - Ceiling	3% Chrysotile
	2-3	Fiber Board	Room 7 - Ceiling	None Detected
12-01	1	Masonry	Exterior - Wall	None Detected
12-02	1-2	Masonry & Mortar	Exterior - Wall	None Detected
13-01	1	Paint	Exterior - Wall	None Detected
13-02	1	Paint	Exterior - Wall	None Detected
14-01	1	Stucco	Exterior - Wall	None Detected
14-02	1	Stucco	Exterior - Wall	None Detected
14-03	1	Stucco	Exterior - Wall	None Detected
15-01	1	Roof Wall Flashing	Roof	40% Chrysotile
15-02	1-3	Built-up Roof	Field of Roof	None Detected
15-03	1	Plastic Roof Cement	Roof	10% Chrysotile

Table 1 - Continued

Client ID	Layer	Material Description	Sample Location	Analytical Results
Building 2				
1-01	1	Drywall	Room 4 - Ceiling	None Detected
	2	Taping Mud	Room 4 - Ceiling	3% Chrysotile
1-02	1	Drywall	Room 4 - Ceiling	None Detected
	2	Taping Mud	Room 4 - Ceiling	3% Chrysotile
2-01	1-2	Exterior Masonry & Mortar	Exterior - Wall	None Detected
2-02	1-2	Exterior Masonry & Mortar	Exterior - Wall	None Detected
3-01	1-2	Wall Plaster	Room 1 - Wall	None Detected
3-02	1-2	Wall Plaster	Room 1 - Wall	None Detected
3-03	1-2	Wall Plaster	Room 1 - Wall	None Detected
4-01	1	12" x 12" Vinyl Floor Tile	Room 1 - Floor	None Detected
	2	Mastic	Room 1 - Floor	5% Chrysotile
4-02	1	12" x 12" Vinyl Floor Tile	Room 1 - Floor	None Detected
	2	Mastic	Room 1 - Floor	5% Chrysotile
5-01	1-2	CMU Block & Grout	Room 5 - Wall	None Detected
5-02	1-2	CMU Block/Paint & Grout	Room 5 - Wall	None Detected
6-01	1	Window Glazing	Room 5	None Detected
6-02	1	Window Glazing	Room 5	None Detected
7-01	1	Paint	Exterior - Wall	None Detected
7-02	1	Paint	Exterior - Wall	None Detected
8-01	1	Built-up Roof	Field of Roof	35% Chrysotile

Table 2

Asbestos-Containing Materials Assessment

TABLE 2

ASBESTOS CONTAINING MATERIALS ASSESSMENT

Commercial Buildings 450 East Belmont Avenue Fresno, California

Material Description	Material Location	% Asb.	* F/ NF	Quantity
Building 1				
Drywall Taping Mud	Room 2 - Ceiling	0.4%	ACCM	300 sq. ft.
Ceiling Insulation	Rooms 2, 3 & 4	3%	F	870 sq. ft.
Fiber Board Coating	Room 7 - Portion of Ceiling	2-3%	F	180 sq. ft.
Roof Wall Flashing	Roof	40%	F	300 sq. ft.
Plastic Roof Cement	Roof	10%	NF	20 sq. ft.
Building 2				
Drywall Taping Mud	Room 4 - Ceiling	0.5%	ACCM	630 sq. ft.
Vinyl Floor Tile Mastic	Room 1	5%	NF**	864 sq. ft.
Built-up Roof	Roof	35%	F	3,000 sq. ft.

* NF = Non-friable, F = Friable, ACCM = Asbestos Containing Construction Material

** Removal of Residual Flooring Mastic by mechanical means would change the classification to Friable (RACM) and require compliance with NESHAP and SJVAPCD requirements.

Appendix A

Laboratory Report for Asbestos & Chain of Custody (PLM Analysis)

EMC LABS, INC.

9830 S. 51st Street, Suite B109, Phoenix, AZ 85044
Phone: 800-362-3373 or 480-940-5294 - Fax: (480) 893-1726

Laboratory Report

0165119

Bulk Asbestos Analysis by Polarized Light Microscopy

NVLAP#101926-0

Client:	T. BROOKS ASSOCIATES, INC.	Job# / P.O. #:	16-7726
Address:	613 HARVARD AVE, STE 201	Date Received:	01/13/2016
	CLOVIS CA 93612	Date Analyzed:	01/15/2016
Collected:	01/12/2016	Date Reported:	01/21/2016
Project Name:	PRODUCER'S DAIRY-BLDG 1	EPA Method:	EPA 600/R-93/116
Address:	450 E. BELMONT	Submitted By:	TROY BROOKS
		Collected By:	

Lab ID Client ID	Sample Location	Layer Name / Sample Description	Asbestos Detected	Asbestos Type (%)	Non-Asbestos Constituents
0165119-001 1-01	RM 1-N. WALL	LAYER 1 Plaster-Scratch Coat, Gray	No	None Detected	Cellulose Fiber <1% Gypsum Quartz Carbonates Mica Binder/Filler 99%
		LAYER 2 Plaster-Finish Coat, White/ Lt. Green	No	None Detected	Cellulose Fiber 1% Carbonates Gypsum Quartz Binder/Filler 99%
0165119-002 1-02	RM 1-S. WALL	LAYER 1 Plaster-Scratch Coat, Gray	No	None Detected	Cellulose Fiber <1% Gypsum Quartz Carbonates Mica Binder/Filler 99%
		LAYER 2 Plaster-Finish Coat, White/ Lt. Green	No	None Detected	Cellulose Fiber 1% Carbonates Gypsum Quartz Binder/Filler 99%
0165119-003 1-03	RM 5-S. WALL	LAYER 1 Plaster-Scratch Coat, Gray	No	None Detected	Quartz Gypsum Carbonates Mica Binder/Filler 100%
		LAYER 2 Plaster-Finish Coat, White	No	None Detected	Carbonates Gypsum Quartz Binder/Filler 100%
		LAYER 3 Tar, Black	No	None Detected	Cellulose Fiber <1% Quartz Binder/Filler 99%

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Address:	450 E. BELMONT	Submitted By:	TROY BROOKS
		Collected By:	

Lab ID Client ID	Sample Location	Layer Name / Sample Description	Asbestos Detected	Asbestos Type (%)	Non-Asbestos Constituents
0165119-004 1-04	RM 5-W. WALL	LAYER 1 Plaster-Scratch Coat, Gray	No	None Detected	Cellulose Fiber <1% Carbonates Quartz Gypsum Mica Binder/Filler 99%
		LAYER 2 Plaster-Finish Coat, White	No	None Detected	Gypsum Quartz Carbonates Mica Binder/Filler 100%
		LAYER 1 Plaster-Scratch Coat, Gray	No	None Detected	Carbonates Quartz Gypsum Mica Binder/Filler 100%
		LAYER 2 Plaster-Finish Coat, White/ Blue	No	None Detected	Carbonates Gypsum Quartz Binder/Filler 100%
0165119-005 1-05	RM 7-COLUMN	LAYER 3 Plaster-Texture, White/ Beige	No	None Detected	Carbonates Mica Quartz Binder/Filler 100%
		LAYER 1 Plaster-Scratch Coat, Gray	No	None Detected	Carbonates Quartz Gypsum Mica Binder/Filler 100%
		LAYER 2 Plaster-Finish Coat, White/ Blue	No	None Detected	Carbonates Gypsum Quartz Binder/Filler 100%

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Project Name:	PRODUCER'S DAIRY-BLDG 1	EPA Method:	EPA 600/R-93/116
Address:	450 E. BELMONT	Submitted By:	TROY BROOKS
		Collected By:	

Lab ID Client ID	Sample Location	Layer Name / Sample Description	Asbestos Detected	Asbestos Type (%)	Non-Asbestos Constituents
0165119-006 1-06	RM 6-W. WALL	LAYER 1 Plaster-Scratch Coat, Gray	No	None Detected	Carbonates Quartz Gypsum Mica Binder/Filler 100%
		LAYER 2 Plaster-Finish Coat, White/ Green	No	None Detected	Quartz Gypsum Carbonates Binder/Filler 100%
0165119-007 1-07	RM 1	LAYER 1 Plaster-Scratch Coat, Gray	No	None Detected	Cellulose Fiber <1% Carbonates Quartz Gypsum Mica Binder/Filler 99%
		LAYER 2 Plaster-Finish Coat, White/ Green/ Red	No	None Detected	Quartz Gypsum Carbonates Binder/Filler 100%
0165119-008 2-01	RM 3	LAYER 1 12"x12" Ceiling Tile, White/ Brown	No	None Detected	Cellulose Fiber 85% Carbonates Binder/Filler 15%
		LAYER 2 Mastic, Brown	No	None Detected	Cellulose Fiber 2% Quartz Carbonates Binder/Filler 98%

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Address:	450 E. BELMONT	Submitted By:	TROY BROOKS
		Collected By:	

Lab ID Client ID	Sample Location	Layer Name / Sample Description	Asbestos Detected	Asbestos Type (%)	Non-Asbestos Constituents	
0165119-009 2-02	RM 3	LAYER 1	No	None Detected	Cellulose Fiber	85%
		12"x12" Ceiling Tile, White/ Brown			Carbonates Binder/Filler	15%
		LAYER 2	No	None Detected	Cellulose Fiber	2%
		Mastic, Brown			Quartz Carbonates Binder/Filler	98%
0165119-010 3-01	RM 3	2x4 Wall Tile, White/ Brown	No	None Detected	Cellulose Fiber	90%
					Carbonates Binder/Filler	10%
0165119-011 3-02	RM 3	2x4 Wall Tile, White/ Brown	No	None Detected	Cellulose Fiber	90%
					Carbonates Binder/Filler	10%
0165119-012 4-01	RM 2	LAYER 1	No	None Detected	Cellulose Fiber	10%
		Drywall, Brown			Gypsum Carbonates Quartz	90%
		LAYER 2			Cellulose Fiber	1%
		Mud, White	Yes	Chrysotile 3%	Carbonates Gypsum Mica Binder/Filler	96%
		LAYER 3	Yes	Chrysotile <1%	Cellulose Fiber	9%
		Drywall/ Mud Composite, White/ Brown Note: COMPOSITE ANALYSIS REQUESTED			Gypsum Carbonates Mica Quartz Binder/Filler	90%

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Project Name:	PRODUCER'S DAIRY-BLDG 1	EPA Method:	EPA 600/R-93/116
Address:	450 E. BELMONT	Submitted By:	TROY BROOKS
		Collected By:	

Lab ID Client ID	Sample Location	Layer Name / Sample Description	Asbestos Detected	Asbestos Type (%)	Non-Asbestos Constituents
0165119-013 4-02	RM 2	LAYER 1 Drywall, Brown	No	None Detected	Cellulose Fiber 8% Fibrous Glass 2% Gypsum Carbonates Quartz 90%
		LAYER 2 Mud, White	Yes	Chrysotile 3%	Cellulose Fiber 1% Carbonates Gypsum Mica Binder/Filler 96%
		LAYER 3 Drywall/ Mud Composite, White/ Brown Note: COMPOSITE ANALYSIS REQUESTED	Yes	Chrysotile <1%	Cellulose Fiber 8% Fibrous Glass 1% Gypsum Carbonates Mica Quartz Binder/Filler 90%
0165119-014 5-01	RM 2	Ceiling Insulation, White	Yes	Amosite 3%	Mineral Wool 90% Cellulose Fiber 2% Gypsum Binder/Filler 5%
0165119-015 5-02	RM 2	LAYER 1 Ceiling Insulation, White	No	None Detected	Mineral Wool 92% Cellulose Fiber 3% Gypsum Binder/Filler 5%
		LAYER 2 Ceiling Insulation Wrap, Brown Note: Difficult to separate adjacent layer	No	None Detected	Cellulose Fiber 90% Mineral Wool 2% Gypsum Binder/Filler 8%

EMC LABS, INC.

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Phone: 800-362-3373 or 480-940-5294 - Fax: (480) 893-1726

Laboratory Report

0165119

Bulk Asbestos Analysis by Polarized Light Microscopy

NVLAP#101926-0

Client:	T. BROOKS ASSOCIATES, INC.	Job# / P.O. #:	16-7726
Address:	613 HARVARD AVE, STE 201	Date Received:	01/13/2016
	CLOVIS CA 93612	Date Analyzed:	01/15/2016
Collected:	01/12/2016	Date Reported:	01/21/2016
Project Name:	PRODUCER'S DAIRY-BLDG 1	EPA Method:	EPA 600/R-93/116
Address:	450 E. BELMONT	Submitted By:	TROY BROOKS
		Collected By:	

Lab ID Client ID	Sample Location	Layer Name / Sample Description	Asbestos Detected	Asbestos Type (%)	Non-Asbestos Constituents
0165119-016 6-01	RM 1	LAYER 1 Ceramic Tile, Lt. Green	No	None Detected	Quartz Gypsum Binder/Filler 100%
		LAYER 2 Mortar, White	No	None Detected	Cellulose Fiber <1% Carbonates Quartz Gypsum Binder/Filler 99%
		LAYER 3 Mastic, Tan	No	None Detected	Cellulose Fiber 2% Quartz Gypsum Binder/Filler 98%
0165119-017 6-02	RM 5	LAYER 1 Ceramic Tile, Lt. Green/ Silver	No	None Detected	Quartz Gypsum Carbonates Binder/Filler 100%
		LAYER 2 Mortar, White	No	None Detected	Cellulose Fiber 1% Carbonates Quartz Gypsum Binder/Filler 99%
		LAYER 3 Thin Set, Lt. Gray	No	None Detected	Cellulose Fiber <1% Gypsum Quartz Carbonates Mica Binder/Filler 99%

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Bulk Asbestos Analysis by Polarized Light Microscopy

NVLAP#101926-0

Client:	T. BROOKS ASSOCIATES, INC.	Job# / P.O. #:	16-7726
Address:	613 HARVARD AVE, STE 201	Date Received:	01/13/2016
	CLOVIS CA 93612	Date Analyzed:	01/15/2016
Collected:	01/12/2016	Date Reported:	01/21/2016
Project Name:	PRODUCER'S DAIRY-BLDG 1	EPA Method:	EPA 600/R-93/116
Address:	450 E. BELMONT	Submitted By:	TROY BROOKS
		Collected By:	

Lab ID Client ID	Sample Location	Layer Name / Sample Description	Asbestos Detected	Asbestos Type (%)	Non-Asbestos Constituents
0165119-018 7-01	RM 3	LAYER 1 CMU, Gray	No	None Detected	Quartz Gypsum Carbonates Binder/Filler 100%
		LAYER 2 Mortar, Gray	No	None Detected	Cellulose Fiber <1% Carbonates Quartz Gypsum Mica Binder/Filler 99%
0165119-019 7-02	RM 4	LAYER 1 CMU, Gray	No	None Detected	Quartz Gypsum Carbonates Binder/Filler 100%
		LAYER 2 Mortar, Gray	No	None Detected	Cellulose Fiber <1% Carbonates Quartz Gypsum Mica Binder/Filler 99%
0165119-020 8-01	RM 4	Window Glazing, Gray/ Lt. Green	No	None Detected	Carbonates Quartz Binder/Filler 100%
0165119-021 8-02	RM 4	Window Glazing, Gray	No	None Detected	Cellulose Fiber 1% Carbonates Quartz Binder/Filler 99%
0165119-022 9-01	RM 7	Door Gasket, Black/ Lt. Green/ Brown	No	None Detected	Cellulose Fiber 60% Carbonates Quartz Binder/Filler 40%

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Bulk Asbestos Analysis by Polarized Light Microscopy

NVLAP#101926-0

Client:	T. BROOKS ASSOCIATES, INC.	Job# / P.O. #:	16-7726
Address:	613 HARVARD AVE, STE 201	Date Received:	01/13/2016
	CLOVIS CA 93612	Date Analyzed:	01/15/2016
Collected:	01/12/2016	Date Reported:	01/21/2016
Project Name:	PRODUCER'S DAIRY-BLDG 1	EPA Method:	EPA 600/R-93/116
Address:	450 E. BELMONT	Submitted By:	TROY BROOKS
		Collected By:	

Lab ID Client ID	Sample Location	Layer Name / Sample Description	Asbestos Detected	Asbestos Type (%)	Non-Asbestos Constituents
0165119-023 9-02	RM 7	Door Gasket, Black/ Lt. Green/ Brown	No	None Detected	Cellulose Fiber 70% Carbonates Binder/Filler 30%
0165119-024 10-01	RM 4	Pipe Insulation, Tan	No	None Detected	Cellulose Fiber 1% Foam Gypsum Binder/Filler 99%
0165119-025 10-02	RM 4	Pipe Insulation, Tan	No	None Detected	Cellulose Fiber 1% Foam Gypsum Binder/Filler 99%
0165119-026 11-01	RM 7	LAYER 1 Fiber Board Coating, White/ Brown	Yes	Chrysotile 2%	Mineral Wool 2% Carbonates Quartz Binder/Filler 96%
		LAYER 2 Fiber Board, Black	No	None Detected	Mineral Wool 30% Gypsum Binder/Filler 70%
		LAYER 3 Fiber Board, Yellow	No	None Detected	Fibrous Glass 95% Cellulose Fiber 2% Binder/Filler 3%
0165119-027 11-02	RM 7	LAYER 1 Fiber Board Coating, White/ Brown	Yes	Chrysotile 3%	Mineral Wool 2% Carbonates Quartz Binder/Filler 95%
		LAYER 2 Fiber Board, Black	No	None Detected	Mineral Wool 30% Gypsum Binder/Filler 70%
		LAYER 3 Fiber Board, Yellow	No	None Detected	Fibrous Glass 95% Cellulose Fiber 2% Binder/Filler 3%

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Bulk Asbestos Analysis by Polarized Light Microscopy

NVLAP#101926-0

Client:	T. BROOKS ASSOCIATES, INC.	Job# / P.O. #:	16-7726
Address:	613 HARVARD AVE, STE 201	Date Received:	01/13/2016
	CLOVIS CA 93612	Date Analyzed:	01/15/2016
Collected:	01/12/2016	Date Reported:	01/21/2016
Project Name:	PRODUCER'S DAIRY-BLDG 1	EPA Method:	EPA 600/R-93/116
Address:	450 E. BELMONT	Submitted By:	TROY BROOKS
		Collected By:	

Lab ID Client ID	Sample Location	Layer Name / Sample Description	Asbestos Detected	Asbestos Type (%)	Non-Asbestos Constituents
0165119-028 12-01	EXTERIOR	Masonry, Orange	No	None Detected	Cellulose Fiber <1% Quartz Gypsum Carbonates Binder/Filler 99%
0165119-029 12-02	EXTERIOR	LAYER 1 Masonry, Orange	No	None Detected	Quartz Gypsum Carbonates Binder/Filler 100%
		LAYER 2 Mortar, Gray	No	None Detected	Cellulose Fiber <1% Gypsum Quartz Carbonates Mica Binder/Filler 99%
0165119-030 13-01	EXTERIOR	Exterior Paint, White/ Gray	No	None Detected	Cellulose Fiber 1% Carbonates Quartz Binder/Filler 99%
0165119-031 13-02	EXTERIOR	Exterior Paint, White/ Gray	No	None Detected	Cellulose Fiber <1% Carbonates Quartz Binder/Filler 99%
0165119-032 14-01	EXTERIOR	Stucco, Gray/ White	No	None Detected	Cellulose Fiber <1% Carbonates Quartz Gypsum Mica Binder/Filler 99%

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NVLAP#101926-0

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	CLOVIS CA 93612	Date Analyzed:	01/15/2016
Collected:	01/12/2016	Date Reported:	01/21/2016
Project Name:	PRODUCER'S DAIRY-BLDG 1	EPA Method:	EPA 600/R-93/116
Address:	450 E. BELMONT	Submitted By:	TROY BROOKS
		Collected By:	

Lab ID Client ID	Sample Location	Layer Name / Sample Description	Asbestos Detected	Asbestos Type (%)	Non-Asbestos Constituents
0165119-033 14-02	EXTERIOR	Stucco, Gray/ White	No	None Detected	Cellulose Fiber <1% Carbonates Quartz Gypsum Mica Binder/Filler 99%
0165119-034 14-03	EXTERIOR	Stucco, Gray/ White	No	None Detected	Cellulose Fiber <1% Carbonates Quartz Gypsum Mica Binder/Filler 99%
0165119-035 15-01	ROOF	Roof Wall Flashing, Gray/ Black	Yes	Chrysotile 40%	Cellulose Fiber 10% Gypsum Carbonates Quartz Binder/Filler 50%
0165119-036 15-02	ROOF	LAYER 1 Roof Field, White/ Black	No	None Detected	Fibrous Glass 15% Quartz Carbonates Binder/Filler 85%
		LAYER 2 Roof Field, Black	No	None Detected	Fibrous Glass 40% Quartz Binder/Filler 60%
		LAYER 3 Roof Field, Black	No	None Detected	Fibrous Glass 40% Quartz Binder/Filler 60%
0165119-037 15-03	ROOF	Roof Cement, Gray/ Black	Yes	Chrysotile 10%	Carbonates Quartz Binder/Filler 90%

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Bulk Asbestos Analysis by Polarized Light Microscopy

NVLAP#101926-0

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Address:	613 HARVARD AVE, STE 201	Date Received:	01/13/2016
	CLOVIS CA 93612	Date Analyzed:	01/15/2016
Collected:	01/12/2016	Date Reported:	01/21/2016
Project Name:	PRODUCER'S DAIRY-BLDG 1	EPA Method:	EPA 600/R-93/116
Address:	450 E. BELMONT	Submitted By:	TROY BROOKS
		Collected By:	

Lab ID	Sample	Layer Name /	Asbestos	Asbestos Type	Non-Asbestos
Client ID	Location	Sample Description	Detected	(%)	Constituents



Analyst - Johann Hofer



Signatory - Lab Director - Kurt Kettler

Distinctly stratified, easily separable layers of samples are analyzed as subsamples of the whole and are reported separately for each discernible layer. All analyses are derived from calibrated visual estimate and measured in area percent unless otherwise noted. The report applies to the standards or procedures identified and to the sample(s) tested. The test results are not necessarily indicated or representative of the qualities of the lot from which the sample was taken or of apparently identical or similar products, nor do they represent an ongoing quality assurance program unless so noted. These reports are for the exclusive use of the addressed client and that they will not be reproduced wholly or in part for advertising or other purposes over our signature or in connection with our name without special written permission. The report shall not be reproduced except in full, without written approval by our laboratory. The samples not destroyed in testing are retained a maximum of thirty days. The laboratory measurement of uncertainty for the test method is approximately less than 1 by area percent. Accredited by the National Institute of Standards and Technology, Voluntary Laboratory Accreditation Program for selected test method for asbestos. The accreditation or any reports generated by this laboratory in no way constitutes or implies product certification, approval, or endorsement by the National Institute of Standards and Technology. The report must not be used by the client to claim product certification, approval, or endorsement by NVLAP, NIST, or any agency of the Federal Government. Polarized Light Microscopy may not be consistently reliable in detecting asbestos in floor coverings and similar non-friable organically bound materials.

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Laboratory Report

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Bulk Asbestos Analysis by Polarized Light Microscopy

NVLAP#101926-0

Client:	T. BROOKS ASSOCIATES, INC.	Job# / P.O. #:	16-7726
Address:	613 HARVARD AVE, STE 201	Date Received:	01/13/2016
	CLOVIS CA 93612	Date Analyzed:	01/15/2016
Collected:	01/12/2016	Date Reported:	01/15/2016
Project Name:	PRODUCER'S DAIRY-BLDG 2	EPA Method:	EPA 600/R-93/116
Address:	450 E. BELMONT	Submitted By:	TROY BROOKS
		Collected By:	

Lab ID Client ID	Sample Location	Layer Name / Sample Description	Asbestos Detected	Asbestos Type (%)	Non-Asbestos Constituents
0165120-001 1-01	RM 4	LAYER 1 Drywall, White/ Beige	No	None Detected	Cellulose Fiber 10% Fibrous Glass 2% Gypsum Mica Carbonates Binder/Filler 88%
		LAYER 2 Mud, White	Yes	Chrysotile 3%	Cellulose Fiber 2% Carbonates Mica Quartz Binder/Filler 95%
		LAYER 1 Drywall, White/ Beige	No	None Detected	Cellulose Fiber 10% Fibrous Glass 2% Gypsum Mica Carbonates Binder/Filler 88%
		LAYER 2 Mud, White	Yes	Chrysotile 3%	Cellulose Fiber 2% Carbonates Mica Quartz Binder/Filler 95%
0165120-002 1-02	RM 4	LAYER 1 Drywall, White/ Beige	No	None Detected	Cellulose Fiber 10% Fibrous Glass 2% Gypsum Mica Carbonates Binder/Filler 88%
		LAYER 2 Mud, White	Yes	Chrysotile 3%	Cellulose Fiber 2% Carbonates Mica Quartz Binder/Filler 95%
		LAYER 1 Drywall, White/ Beige	No	None Detected	Cellulose Fiber 10% Fibrous Glass 2% Gypsum Mica Carbonates Binder/Filler 88%
		LAYER 2 Mud, White	Yes	Chrysotile 3%	Cellulose Fiber 2% Carbonates Mica Quartz Binder/Filler 95%
0165120-003 2-01	EXTERIOR	LAYER 1 Exterior Masonry, Red	No	None Detected	Cellulose Fiber <1% Gypsum Quartz Mica Binder/Filler 99%
		LAYER 2 Mortar, Gray	No	None Detected	Gypsum Carbonates Mica Quartz Binder/Filler 100%
		LAYER 1 Exterior Masonry, Red	No	None Detected	Cellulose Fiber <1% Gypsum Quartz Mica Binder/Filler 99%
		LAYER 2 Mortar, Gray	No	None Detected	Gypsum Carbonates Mica Quartz Binder/Filler 100%

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Bulk Asbestos Analysis by Polarized Light Microscopy

NVLAP#101926-0

Client:	T. BROOKS ASSOCIATES, INC.	Job# / P.O. #:	16-7726
Address:	613 HARVARD AVE, STE 201	Date Received:	01/13/2016
	CLOVIS CA 93612	Date Analyzed:	01/15/2016
Collected:	01/12/2016	Date Reported:	01/15/2016
Project Name:	PRODUCER'S DAIRY-BLDG 2	EPA Method:	EPA 600/R-93/116
Address:	450 E. BELMONT	Submitted By:	TROY BROOKS
		Collected By:	

Lab ID Client ID	Sample Location	Layer Name / Sample Description	Asbestos Detected	Asbestos Type (%)	Non-Asbestos Constituents
0165120-004 2-02	EXTERIOR	LAYER 1 Exterior Masonry, Red	No	None Detected	Cellulose Fiber <1% Gypsum Quartz Mica Binder/Filler 99%
		LAYER 2 Mortar, Gray	No	None Detected	Cellulose Fiber <1% Gypsum Carbonates Mica Quartz Binder/Filler 99%
0165120-005 3-01	RM 1	LAYER 1 Wall Plaster-Scratch Coat, Gray	No	None Detected	Gypsum Carbonates Mica Quartz Binder/Filler 100%
		LAYER 2 Wall Plaster-Finish Coat, Tan	No	None Detected	Cellulose Fiber <1% Gypsum Mica Quartz Carbonates Binder/Filler 99%
0165120-006 3-02	RM 1	LAYER 1 Wall Plaster-Scratch Coat, Gray	No	None Detected	Cellulose Fiber <1% Gypsum Carbonates Mica Quartz Binder/Filler 99%
		LAYER 2 Wall Plaster-Finish Coat, Tan	No	None Detected	Cellulose Fiber <1% Gypsum Mica Quartz Carbonates Binder/Filler 99%

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Bulk Asbestos Analysis by Polarized Light Microscopy

NVLAP#101926-0

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Address:	613 HARVARD AVE, STE 201	Date Received:	01/13/2016
	CLOVIS CA 93612	Date Analyzed:	01/15/2016
Collected:	01/12/2016	Date Reported:	01/15/2016
Project Name:	PRODUCER'S DAIRY-BLDG 2	EPA Method:	EPA 600/R-93/116
Address:	450 E. BELMONT	Submitted By:	TROY BROOKS
		Collected By:	

Lab ID Client ID	Sample Location	Layer Name / Sample Description	Asbestos Detected	Asbestos Type (%)	Non-Asbestos Constituents
0165120-007 3-03	RM 1	LAYER 1	No	None Detected	Cellulose Fiber <1%
		Wall Plaster-Scratch Coat, Gray			Gypsum Mica Quartz Carbonates Binder/Filler 99%
		LAYER 2	No	None Detected	Cellulose Fiber <1%
		Wall Plaster-Finish Coat, Tan			Gypsum Mica Quartz Carbonates Binder/Filler 99%
0165120-008 4-01	RM 1	LAYER 1	No	None Detected	Carbonates Gypsum Quartz Binder/Filler 100%
		12"x12" VFT, Gray			Cellulose Fiber 2%
		LAYER 2	Yes	Chrysotile 5%	Gypsum Carbonates Quartz Binder/Filler 93%
		Mastic, Black			
0165120-009 4-02	RM 1	LAYER 1	No	None Detected	Cellulose Fiber 3%
		12"x12" VFT, Gray			Carbonates Gypsum Quartz Binder/Filler 97%
		LAYER 2	Yes	Chrysotile 5%	Cellulose Fiber 2%
		Mastic, Black			Gypsum Carbonates Quartz Binder/Filler 93%

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Bulk Asbestos Analysis by Polarized Light Microscopy

NVLAP#101926-0

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Address:	613 HARVARD AVE, STE 201	Date Received:	01/13/2016
	CLOVIS CA 93612	Date Analyzed:	01/15/2016
Collected:	01/12/2016	Date Reported:	01/15/2016
Project Name:	PRODUCER'S DAIRY-BLDG 2	EPA Method:	EPA 600/R-93/116
Address:	450 E. BELMONT	Submitted By:	TROY BROOKS
		Collected By:	

Lab ID Client ID	Sample Location	Layer Name / Sample Description	Asbestos Detected	Asbestos Type (%)	Non-Asbestos Constituents
0165120-010 5-01	RM 5	LAYER 1 CMU Block, Gray/ Black	No	None Detected	Carbonates Gypsum Mica Quartz Binder/Filler 100%
		LAYER 2 CMU Grout, Gray	No	None Detected	Gypsum Carbonates Mica Quartz Binder/Filler 100%
	RM 5	LAYER 1 CMU Block/Paint, Gray/ Black/Yellow Note: Difficult to separate adjacent layers	No	None Detected	Carbonates Gypsum Mica Quartz Binder/Filler 100%
		LAYER 2 CMU Grout, Gray	No	None Detected	Cellulose Fiber <1% Gypsum Carbonates Mica Quartz Binder/Filler 99%
0165120-012 6-01	RM 5	Window Glazing, White/ Gray	No	None Detected	Cellulose Fiber <1% Carbonates Quartz Binder/Filler 99%
0165120-013 6-02	RM 5	Window Glazing, White/ Gray	No	None Detected	Cellulose Fiber <1% Carbonates Quartz Binder/Filler 99%

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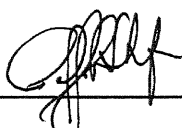
0165120

Bulk Asbestos Analysis by Polarized Light Microscopy

NVLAP#101926-0

Client:	T. BROOKS ASSOCIATES, INC.	Job# / P.O. #:	16-7726
Address:	613 HARVARD AVE, STE 201	Date Received:	01/13/2016
	CLOVIS CA 93612	Date Analyzed:	01/15/2016
Collected:	01/12/2016	Date Reported:	01/15/2016
Project Name:	PRODUCER'S DAIRY-BLDG 2	EPA Method:	EPA 600/R-93/116
Address:	450 E. BELMONT	Submitted By:	TROY BROOKS
		Collected By:	

Lab ID Client ID	Sample Location	Layer Name / Sample Description	Asbestos Detected	Asbestos Type (%)	Non-Asbestos Constituents
0165120-014 7-01	EXTERIOR	Paint, Gray	No	None Detected	Cellulose Fiber 1% Gypsum Quartz Binder/Filler 99%
0165120-015 7-02	EXTERIOR	Paint, Gray	No	None Detected	Cellulose Fiber 2% Gypsum Carbonates Quartz Binder/Filler 98%
0165120-016 8-01	ROOF	Roof Field, Black	Yes	Chrysotile 35%	Cellulose Fiber 5% Gypsum Quartz Carbonates Binder/Filler 60%



Analyst - Paul Hofer



Signatory - Lab Director - Kurt Kettler

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Laboratory Report

0165440

Bulk Asbestos Analysis by Polarized Light Microscopy

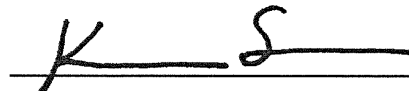
NVLAP#101926-0

Client: T. BROOKS ASSOCIATES, INC. Job# / P.O. #: 16-7726
Address: 613 HARVARD AVE, STE 201 Date Received: 01/21/2016
CLOVIS CA 93612 Date Analyzed: 01/22/2016
Collected: 01/12/2016 Date Reported: 01/22/2016
Project Name: PRODUCER'S DAIRY-BLDG 1-450 E. EPA Method: EPA 600/R-93/116
BELMONT Submitted By: TROY BROOKS
Address: POINT COUNT VIA EMC LAB #165119
Collected By:

Lab ID Client ID	Sample Location	Layer Name / Sample Description	Asbestos Detected	Asbestos Type (%)	Non-Asbestos Constituents
0165440-001 4-01	RM 2	Drywall/ Mud Composite, Beige/ Brown/ White	Yes	Chrysotile 0.4%	Cellulose Fiber 8.9% Gypsum Carbonates Quartz Mica Binder/Filler 90.7%
COMPOSITE ANALYSIS REQUESTED; 400 Pt. POINT COUNT					
0165440-002 4-02	RM 2	Drywall/ Mud Composite, Beige/ Brown/ White	Yes	Chrysotile 0.4%	Cellulose Fiber 9.6% Gypsum Carbonates Quartz Mica Binder/Filler 90.0%
COMPOSITE ANALYSIS REQUESTED; 400 Pt. POINT COUNT					



Analyst - Kurt Kettler



Signatory - Lab Manager - Ken Scheske

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Laboratory Report

0165441

Bulk Asbestos Analysis by Polarized Light Microscopy

NVLAP#101926-0

Client: T. BROOKS ASSOCIATES, INC. Job# / P.O. #: 16-7726
Address: 613 HARVARD AVE, STE 201 Date Received: 01/21/2016
CLOVIS CA 93612 Date Analyzed: 01/22/2016
Collected: 01/12/2016 Date Reported: 01/22/2016
Project Name: PRODUCER'S DAIRY-BLDG 2-450 E. EPA Method: EPA 600/R-93/116
BELMONT Submitted By: TROY BROOKS
Address: POINT COUNT VIA EMC LAB #165120
Collected By:

Lab ID Client ID	Sample Location	Layer Name / Sample Description	Asbestos Detected	Asbestos Type (%)	Non-Asbestos Constituents
0165441-001 1-01	RM 4	Drywall/ Mud Composite, White/ Beige/ Off White	Yes	Chrysotile 0.5%	Cellulose Fiber 8.5% Fibrous Glass 1.7% Gypsum Carbonates Mica Quartz Binder/Filler 89.3%

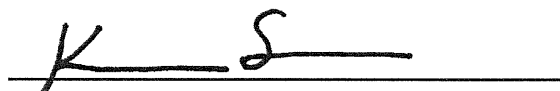
COMPOSITE ANALYSIS REQUESTED; 400 Pt. POINT COUNT

0165441-002 1-02	RM 4	Drywall/ Mud Composite, White/ Beige/ Off White	Yes	Chrysotile 0.4%	Cellulose Fiber 8.5% Fibrous Glass 1.7% Gypsum Carbonates Mica Quartz Binder/Filler 89.4%
---------------------	------	--	-----	-----------------	---

COMPOSITE ANALYSIS REQUESTED; 400 Pt. POINT COUNT



Analyst - Kurt Kettler



Signatory - Lab Manager - Ken Scheske

Distinctly stratified, easily separable layers of samples are analyzed as subsamples of the whole and are reported separately for each discernible layer. All analyses are derived from calibrated visual estimate and measured in area percent unless otherwise noted. The report applies to the standards or procedures identified and to the sample(s) tested. The test results are not necessarily indicated or representative of the qualities of the lot from which the sample was taken or of apparently identical or similar products, nor do they represent an ongoing quality assurance program unless so noted. These reports are for the exclusive use of the addressed client and that they will not be reproduced wholly or in part for advertising or other purposes over our signature or in connection with our name without special written permission. The report shall not be reproduced except in full, without written approval by our laboratory. The samples not destroyed in testing are retained a maximum of thirty days. The laboratory measurement of uncertainty for the test method is approximately less than 1 by area percent. Accredited by the National Institute of Standards and Technology, Voluntary Laboratory Accreditation Program for selected test method for asbestos. The accreditation or any reports generated by this laboratory in no way constitutes or implies product certification, approval, or endorsement by the National Institute of Standards and Technology. The report must not be used by the client to claim product certification, approval, or endorsement by NVLAP, NIST, or any agency of the Federal Government. Polarized Light Microscopy may not be consistently reliable in detecting asbestos in floor coverings and similar non-friable organically bound materials.

165119

PAGE 2 OF 6		CHAIN OF CUSTODY RECORD				TURN-AROUND TIME	
DATE 1/12/16		TESTING LAB: EMC		6 HRS. 24 HRS.		48 HRS.	
BILL TO:		PROJECT INFORMATION					
T. BROOKS & ASSOCIATES, INC		PROJECT NAME: Producer's Dairy					
ROOF AND ENVIRONMENTAL CONSULTANTS		ADDRESS: 450 E. Belmont					
613 HARVARD AVE., STE. 201, CLOVIS, CA. 93612		PROJECT # 16-7726					
PHONE: (559) 298-9135 FAX: (559) 298-2281		CONTACT: TROY B. TIM T. Trevor B.		284-5573 298-9135			
MOBILE # (559)		TIME ON TIME OFF		TOTAL TIME		START STOP VOLUME	
SAMPLE #	SAMPLE DESCRIPTION Building 1						
3-02	MAT LOC: Rm. 3	WALL CLG. FL					
	MAT DESC. 2' x 4' Wall Tile						
4-01	MAT LOC: Rm. 2	WALL CLG. FL					
	MAT DESC. Drywall w/ Mud						
4-02	MAT LOC: Rm. 2	WALL CLG. FL					
	MAT DESC. DW w/ Mud						
5-01	MAT LOC: Rm. 2	WALL CLG. FL					
	MAT DESC. Ceiling Insulation						
5-02	MAT LOC: Rm. 2	WALL CLG. FL					
	MAT DESC. Ceiling Insulation						
6-01	MAT LOC: Rm. 1	WALL CLG. FL					
	MAT DESC. Ceramic Tile w/ Mortar						
6-02	MAT LOC: Rm. 5	WALL CLG. FL					
	MAT DESC. Ceramic Tile w/ Mortar						
7-01	MAT LOC: Rm. 3	WALL CLG. FL					
	MAT DESC. CMU w/ Mortar						
7-02	MAT LOC: Rm. 4	WALL CLG. FL					
	MAT DESC. CMU w/ Mortar						
8-01	MAT LOC: Rm. 4	WALL CLG. FL					
	MAT DESC. Window Glazing						
TRANSACTIONS		TRANSACTIONS		TRANSACTIONS		SHIPPING PAID BY:	
(RELINQUISHED BY SIGNATURE)		(APPROVED BY SIGNATURE)		DATE: 1/13/16		LAB X	
(RELINQUISHED BY SIGNATURE)		(APPROVED BY SIGNATURE)		DATE: 1/13/16		CLIENT	
						BROOKS	

EMC

PHONE: (559) 298-9135 FAX: (559) 298-2281

MAT DESC.	PAINT

(RELINQUISHED BY SIGNATURE)

(APPROVED BY SIGNATURE)

DATE: 1/11/01

CLIENT:

DATE: 1/11/01

CLIENT:

165119

PAGE 4 OF 6		CHAIN OF CUSTODY RECORD				TURN-AROUND TIME					
DATE 1/12/16		TESTING LAB: EMC				6 HRS.		24 HRS.		48 HRS.	
BILL TO:		PROJECT INFORMATION				EMAIL RESULTS TO: brooksconsult@sbcglobal.net					
T. BROOKS & ASSOCIATES, INC		PROJECT NAME: Producer's Dairy		TIM T. Trevor B.							
ROOF AND ENVIRONMENTAL CONSULTANTS		ADDRESS: 450 E. Belmont		284-5573							
613 HARVARD AVE., STE. 201, CLOVIS, CA. 93612		PROJECT # 16-7726		288-8357							
PHONE: (559) 298-9135 FAX: (559) 298-2281		CONTACT		MOBIL # (559)							
SAMPLE #	SAMPLE DESCRIPTION Building 1	TIME ON TIME OFF	TOTAL TIME	START	STOP	VOLUME	P C M	P L M	T E M	L E A D W I P E	L E A D P A I N T
13-02	MAT LOC.: Exterior										
	MAT DESC. Paint										
14-01	MAT LOC.: Exterior										
	MAT DESC. Stucco										
14-02	MAT LOC.: Exterior										
	MAT DESC. Stucco										
14-03	MAT LOC.: Exterior										
	MAT DESC. Stucco										
15-01	MAT LOC.: Roof										
	MAT DESC. Wall Flashing										
15-02	MAT LOC.: Roof										
	MAT DESC. Field of Roof										
15-03	MAT LOC.: Roof										
	MAT DESC. Cement										
	MAT LOC.:										
	MAT DESC.										
	MAT LOC.:										
	MAT DESC.										
	MAT LOC.:										
	MAT DESC.										
TRANSACTIONS		TRANSACTIONS				SHIPPING PAID BY:					
(RELINQUISHED BY SIGNATURE)		(APPROVED BY SIGNATURE)				DATE: 1/13/16					
(RELINQUISHED BY SIGNATURE)		(APPROVED BY SIGNATURE)				DATE: 1.13.16					

31
32
33
34
35
36
37

165120

CHAIN OF CUSTODY RECORD

PAGE 5 OF 6

DATE 1/12/16

TESTING LAB: EMC

TURN-AROUND TIME

6 HRS. 24 HRS. 48 HRS.

EMAIL RESULTS TO: brooksconsult@sbcglobal.net

BILL TO:

PROJECT INFORMATION

PROJECT NAME: Producer's Dairy

ADDRESS: 450 E. Belmont

PROJECT # 16-7726

CONTACT

MOBIL # (559) 287-8357

TROY B. TIM T. Trevor B. 284-5573 298-9135

T. BROOKS & ASSOCIATES, INC

ROOF AND ENVIRONMENTAL CONSULTANTS

613 HARVARD AVE., STE. 201, CLOVIS, CA. 93612

PHONE: (559) 298-9135 FAX: (559) 298-2281

SAMPLE #	SAMPLE DESCRIPTION	Building 2	MAT LOC.	MAT DESC.	TIME ON TIME OFF	TOTAL TIME	START	STOP	VOLUME	P C M	P L M	T E M	L E A D W I P E	L E A D P A I N T
1-01			Rm. 4	WALL CLG. FL										
1-02			Rm. 4	WALL CLG. FL										
2-01			Exterior	WALL CLG. FL										
2-02			Masonry w/ Mortar	WALL CLG. FL										
3-01			Exterior	WALL CLG. FL										
3-02			Masonry w/ Mortar	WALL CLG. FL										
3-03			Rm. 1	WALL CLG. FL										
4-01			Plaster	WALL CLG. FL										
4-02			Rm. 1	WALL CLG. FL										
5-01			Plaster	WALL CLG. FL										
			Rm. 1	WALL CLG. FL										
			12" x 12" Vinyl Floor Tile w/ Mortar	WALL CLG. FL										
			Rm. 1	WALL CLG. FL										
			12" x 12" VFT w/ Mortar	WALL CLG. FL										
			Rm. 5	WALL CLG. FL										
			CMU	WALL CLG. FL										

TRANSACTIONS		TRANSACTIONS		SHIPPING PAID BY:	
(RELINQUISHED BY SIGNATURE)	DATE:	(APPROVED BY SIGNATURE)	DATE:	DATE:	LAB X
<i>Diana Fedorova</i>	1/13/16	<i>Diana Fedorova</i>	1/13/16	1/13/16	CLIENT
(RELINQUISHED BY SIGNATURE)	DATE:	(APPROVED BY SIGNATURE)	DATE:		BROOKS
<i>Diana Fedorova</i>	1/13/16	<i>[Signature]</i>	1/13/16		

CHAIN OF CUSTODY

EMC Labs, Inc.
9830 S. 51st St., Ste B-109
Phoenix, AZ 85044
(800) 362-3373 Fax (480) 893-1726

LAB#: 165440
TAT: 1 day
Rec'd: JAN 21 PM

COMPANY NAME: T. BROOKS & ASSOCIATES, INC.

BILL TO: (If Different Location)

613 Harvard Avenue, Suite 201

Clovis, CA 93612

CONTACT: Troy Brooks SCAN COC's

Phone/Fax: (559) 298-9135 / (559) 298-2281

Email: brooksconsult@sbcglobal.net

Now Accepting: VISA - MASTERCARD

Price Quoted: \$ ____ / Sample \$ ____ / Layers

COMPLETE ITEMS 1-4: (Failure to complete any items may cause a delay in processing or analyzing your samples)1. TURNAROUND TIME: [Same Day RUSH] [1-Day] [2-Day] [3-4-5 Day] [6-10 Day]

***Prior confirmation of turnaround time is required

***Additional charges for rush analysis (please call marketing department for pricing details)

***Laboratory analysis may be subject to delay if credit terms are not met

2. TYPE OF ANALYSIS: [Bulk-PLM] [Air-PCM] [Lead] [Point Count] [Fungi: AOC, W-C, Bulk, Swab, Tape]

3. DISPOSAL INSTRUCTIONS: [Dispose of samples at EMC] / [Return samples to me at my expense]

(If you do not indicate preference, EMC will dispose of samples 30 days from analysis.)

4. Project Name: Producer's Dairy - Bldg 1 - 450 E. BelmontP.O. Number: _____ Project Number: 16-7726

EMC SAMPLE #	CLIENT SAMPLE #	DATE & TIME SAMPLED	LOCATION/MATERIAL TYPE	Samples Accepted Yes / No	AIR SAMPLE INFO / COMMENTS		
					ON	OFF	FLOW RATE
1	4-01	1/12/16		<u>(X)</u> N			
2	4-02	1		<u>(X)</u> N			
				Y N			
				Y N			
				Y N			
			Composite	Y N			
				Y N			
				Y N			
				Y N			
				Y N			
				Y N			
				Y N			
				Y N			
				Y N			
				Y N			
				Y N			
				Y N			

SPECIAL INSTRUCTIONS: _____

Sample Collector: (Print) _____ (Signature) _____

Relinquished by: _____ Date/Time: _____ Received by: Diana Federico Date/Time: 1/21/16Relinquished by: Diana Federico Date/Time: 1/21/16 Received by: [Signature] Date/Time: 1/21/16

Relinquished by: _____ Date/Time: _____ Received by: _____ Date/Time: _____

** In the event of any dispute between the above parties for these services or otherwise, parties agree that jurisdiction and venue will be in Phoenix, Arizona and prevailing party will be entitled to attorney's fees and court costs.

Rev. 09/01/08

CHAIN OF CUSTODY

EMC Labs, Inc.
9830 S. 51st St., Ste B-109
Phoenix, AZ 85044
(800) 362-3373 Fax (480) 893-1726

LAB#: 165441
TAT: 1 day
Rec'd: JAN 21 PM

COMPANY NAME: T. BROOKS & ASSOCIATES, INC.

BILL TO: (If Different Location)

613 Harvard Avenue, Suite 201

Clovis, CA 93612

CONTACT:

Troy Brooks

SCAN COC's

Phone/Fax:

(559) 298-9135 / (559) 298-2281

Email:

brookscsult@sbcbglobal.net

Now Accepting: VISA - MASTERCARD

Price Quoted: \$ ____ / Sample \$ ____ / Layers

COMPLETE ITEMS 1-4: (Failure to complete any items may cause a delay in processing or analyzing your samples)1. **TURNAROUND TIME:** [Same Day RUSH] [1-Day] [2-Day] [3-4-5 Day] [6-10 Day]****Prior confirmation of turnaround time is required

****Additional charges for rush analysis (please call marketing department for pricing details)

****Laboratory analysis may be subject to delay if credit terms are not met

2. **TYPE OF ANALYSIS:** [Bulk-PLM] [Air-PCM] [Lead] [Point Count] [Fungi: AOC, W-C, Bulk, Swab, Tape]3. **DISPOSAL INSTRUCTIONS:** [Dispose of samples at EMC] / [Return samples to me at my expense]

(If you do not indicate preference, EMC will dispose of samples 30 days from analysis.)

4. **Project Name:** Producer's Dairy - Bldg 2 - 450 E. Belmont

P.O. Number: _____

Project Number: 16-7726

EMC SAMPLE #	CLIENT SAMPLE #	DATE & TIME SAMPLED	LOCATION/MATERIAL TYPE	Samples Accepted Yes / No	AIR SAMPLE INFO / COMMENTS		
					ON	OFF	FLOW RATE
1	1-01	1/12		<input checked="" type="radio"/> N			
2	1-02			<input checked="" type="radio"/> N			
				Y N			
				Y N			
			Composite	Y N			
				Y N			
				Y N			
				Y N			
				Y N			
				Y N			
				Y N			
				Y N			
				Y N			
				Y N			
				Y N			
				Y N			

SPECIAL INSTRUCTIONS: _____

Sample Collector: (Print) _____

(Signature) _____

Relinquished by: _____

Date/Time: _____

Received by: Diana FedericoDate/Time: 1/21/16Relinquished by: Diana FedericoDate/Time: 1/21/16Received by: [Signature]Date/Time: 1/21/16

Relinquished by: _____

Date/Time: _____

Received by: _____

Date/Time: _____

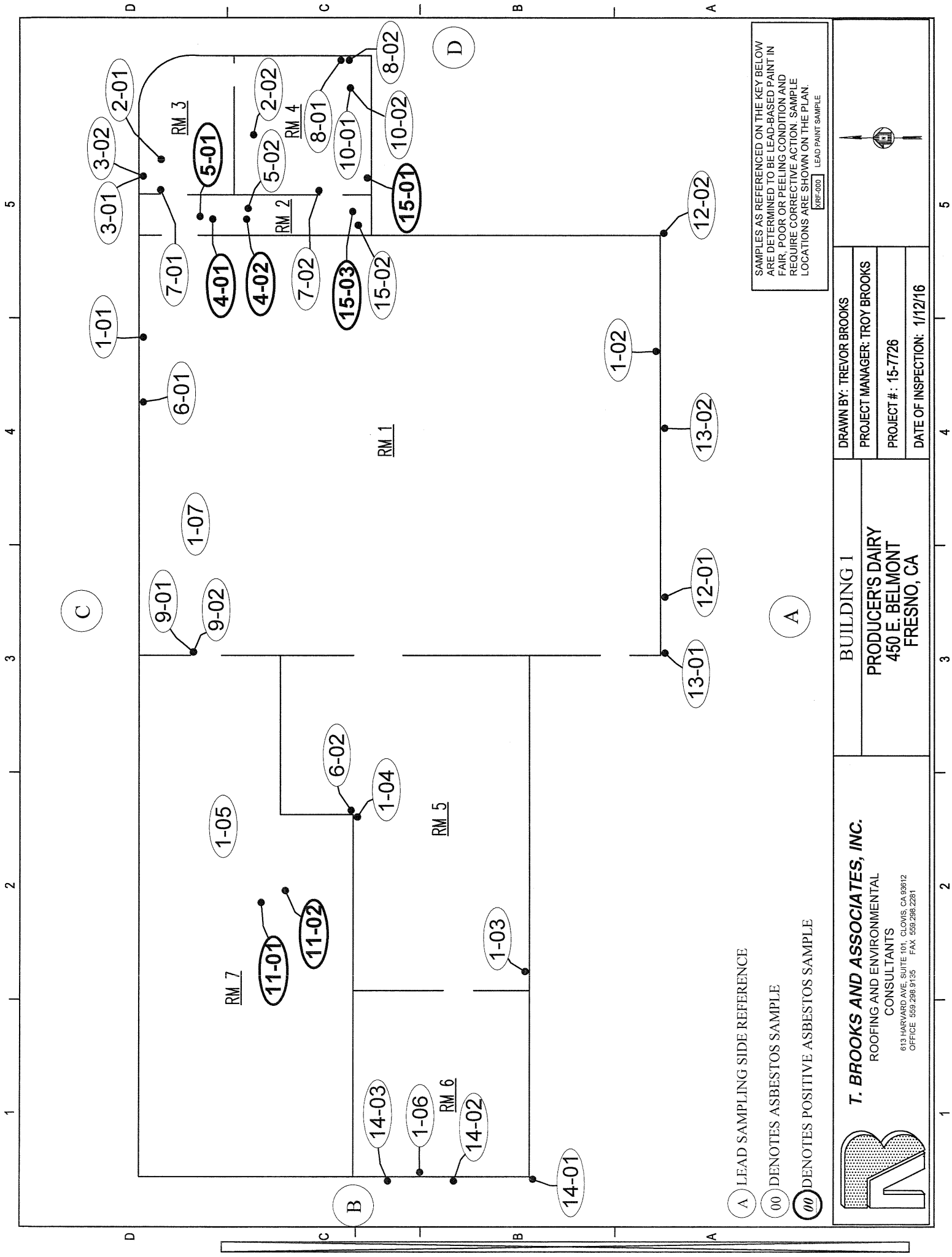
** In the event of any dispute between the above parties for these services or otherwise, parties agree that jurisdiction and venue will be in Phoenix, Arizona and prevailing party will be entitled to attorney's fees and court costs.

Rev. 09/01/08

Appendix B

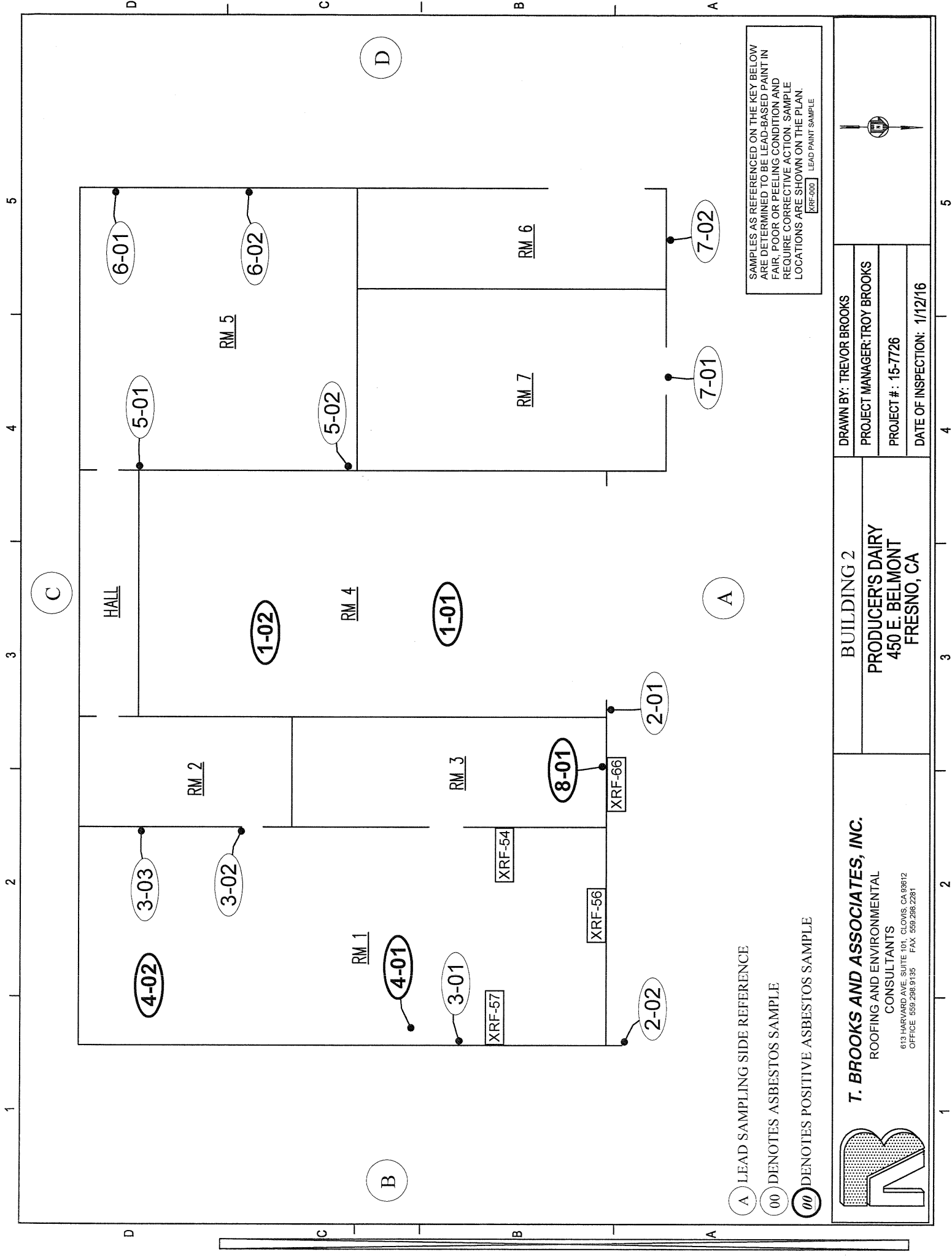
Floor Plans Indicating

- Asbestos Sampling Locations**
- Lead Sampling Orientation & Lead Hazards**



SAMPLES AS REFERENCED ON THE KEY BELOW
ARE DETERMINED TO BE LEAD-BASED PAINT IN
FAIR, POOR OR PEELING CONDITION AND
REQUIRE CORRECTIVE ACTION. SAMPLE
LOCATIONS ARE SHOWN ON THE PLAN.
[XRF-000] LEAD PAINT SAMPLE

 <p>T. BROOKS AND ASSOCIATES, INC. ROOFING AND ENVIRONMENTAL CONSULTANTS 613 HARVARD AVE, SUITE 101, CLOVIS, CA 93612 OFFICE 559.298.9135 FAX 559.298.2281</p>	<p>BUILDING 1</p>		<p>PRODUCER'S DAIRY 450 E. BELMONT FRESNO, CA</p>		<p>DRAWN BY: TREVOR BROOKS</p>
					<p>PROJECT MANAGER: TROY BROOKS</p>
					<p>PROJECT #: 15-7726</p>
					<p>DATE OF INSPECTION: 1/12/16</p>



T. BROOKS AND ASSOCIATES, INC.
 ROOFING AND ENVIRONMENTAL
 CONSULTANTS
 613 HARVARD AVE, SUITE 101, CLOVIS, CA 93812
 OFFICE 559.298.9135 FAX 559.298.2281

BUILDING 2
PRODUCER'S DAIRY
450 E. BELMONT
FRESNO, CA

DRAWN BY: TREVOR BROOKS
PROJECT MANAGER: TROY BROOKS
PROJECT #: 15-7726
DATE OF INSPECTION: 1/12/16



Appendix C

XRF Results for Lead All Readings

LEAD PAINT INSPECTION

Site: Producer's Dairy Foods
450 Belmont Avenue
Fresno, California

Project No. 16-7726
Site #1

Prepared for: BMY Construction

Date: Jan. 12, 2016

No.	Lead Lvl	± Prec	Results	Sec	Date Time	Building	Side	Room	Component	Substrate	Condition	Color
1	1.00	0.10	Positive	5.00	1/12/2016 11:53	1			CALIBRATE - FRONT			
2	1.00	0.10	Positive	5.00	1/12/2016 11:54	1			CALIBRATE - FRONT			
3	1.00	0.10	Positive	5.00	1/12/2016 11:54	1			CALIBRATE - FRONT			
4	11.30	0.30	Positive	1.00	1/12/2016 11:56	1	A	Room #1	Wall	Ceramic Tile	Intact	White
5	0.10	0.30	Negative	1.00	1/12/2016 11:58	1	A	Room #1	Wall	Plaster	Intact	Green
6	0.20	0.30	Negative	1.00	1/12/2016 12:01	1	B	Room #1	Wall	Plaster	Peeling	Green
7	0.40	0.30	Negative	1.00	1/12/2016 12:02	1	B	Room #1	Wall	Plaster	Peeling	Green
8	12.30	0.30	Positive	1.00	1/12/2016 12:03	1	B	Room #1	Wall	Ceramic Tile	Intact	White
9	10.00	0.30	Positive	1.00	1/12/2016 12:04	1	C	Room #1	Wall	Ceramic Tile	Intact	White
10	0.40	0.30	Negative	1.00	1/12/2016 12:05	1	C	Room #1	Wall	Plaster	Intact	Green
11	0.30	0.30	Negative	1.00	1/12/2016 12:06	1	D	Room #1	Wall	Plaster	Intact	Green
12	11.10	0.30	Positive	1.00	1/12/2016 12:07	1	D	Room #1	Wall	Ceramic Tile	Intact	White
13	-0.30	0.30	Negative	1.00	1/12/2016 12:09	1	Ceiling	Room #1	Ceiling	Plaster	Poor	Green
14	0.70	0.20	Negative	2.00	1/12/2016 12:12	1	B	Room #1	Column	Metal	Intact	White
15	10.60	0.30	Positive	1.00	1/12/2016 12:14	1	A	Room #2	Wall	Ceramic Tile	Intact	Green
16	10.40	0.30	Positive	1.00	1/12/2016 12:15	1	B	Room #2	Wall	Ceramic Tile	Intact	Green
17	0.00	0.30	Negative	1.00	1/12/2016 12:16	1	C	Room #2	Wall	Ceramic Tile	Intact	Green
18	-0.10	0.30	Negative	1.00	1/12/2016 12:16	1	D	Room #2	Wall	Ceramic Tile	Intact	Green
19	-0.10	0.30	Negative	1.00	1/12/2016 12:17	1	Ceiling	Room #2	Ceiling	Ceramic Tile	Intact	Green
20	0.30	0.30	Negative	1.00	1/12/2016 12:20	1	A	Room #3	Wall	Plaster	Peeling	White
21	0.50	0.30	Negative	1.00	1/12/2016 12:22	1	B	Room #3	Wall	Plaster	Poor	White
22	0.40	0.30	Negative	1.00	1/12/2016 12:23	1	B	Room #3	Wall	Plaster	Poor	Pink
23	4.60	0.30	Positive	1.00	1/12/2016 12:25	1	B	Room #3	Window Case	Wood	Intact	White
24	0.00	0.30	Negative	1.00	1/12/2016 12:26	1	C	Room #3	Wall	Cinderblock	Intact	Gray
25	-0.10	0.30	Negative	1.00	1/12/2016 12:27	1	D	Room #3	Wall	Cinderblock	Intact	Gray
26	10.40	0.30	Positive	1.00	1/12/2016 12:29	1	A	Room #5	Wall	Ceramic Tile	Intact	Green
27	-0.20	0.30	Negative	1.00	1/12/2016 12:30	1	A	Room #5	Wall	Plaster	Intact	Green
28	0.40	0.30	Negative	1.00	1/12/2016 12:30	1	B	Room #5	Wall	Plaster	Intact	Green
29	9.00	0.30	Positive	1.00	1/12/2016 12:31	1	B	Room #5	Wall	Ceramic Tile	Intact	White
30	0.60	0.30	Negative	1.00	1/12/2016 12:32	1	C	Room #5	Wall	Plaster	Intact	Green

LEAD PAINT INSPECTION

Site: Producer's Dairy Foods
450 Belmont Avenue
Fresno, California

Project No. 16-7726
Site #1

Prepared for: BMY Construction

Date: Jan. 12, 2016

No.	Lead Lvl	± Prec	Results	Sec	Date Time	Building	Side	Room	Component	Substrate	Condition	Color
31	0.20	0.30	Negative	1.00	1/12/2016 12:33	1	C	Room #5	Door	Metal	Intact	Lt-Blue
32	0.30	0.30	Negative	1.00	1/12/2016 12:34	1	D	Room #5	Wall	Plaster	Intact	Green
33	0.50	0.30	Negative	1.00	1/12/2016 12:37	1	A	Room #6	Wall	Plaster	Intact	White
34	0.10	0.30	Negative	1.00	1/12/2016 12:38	1	B	Room #6	Wall	Plaster	Intact	White
35	0.00	0.30	Negative	1.00	1/12/2016 12:40	1	D	Room #6	Wall	Plaster	Intact	White
36	0.30	0.30	Negative	1.00	1/12/2016 12:42	1	Ceiling	Room #6	Ceiling		Intact	White
37	-0.10	0.30	Negative	1.00	1/12/2016 12:43	1	D	Room #6	Column	Plaster	Intact	White
38	0.20	0.30	Negative	1.00	1/12/2016 12:45	1	C	Exterior	Wall	Brick	Poor	White
39	0.30	0.30	Negative	1.00	1/12/2016 12:46	1	D	Exterior	Wall	Brick	Poor	White
40	0.10	0.20	Negative	1.00	1/12/2016 12:47	1	D	Exterior	Door	Wood	Poor	White
41	0.10	0.30	Negative	1.00	1/12/2016 12:48	1	D	Exterior	Wall	Stucco	Intact	White
42	0.00	0.30	Negative	1.00	1/12/2016 12:52	1	D	Room #1	Stair Tread	Metal	Poor	White
43	1.10	0.10	Positive	5.00	1/12/2016 12:54				CALIBRATE			
44	0.90	0.10	Negative	5.00	1/12/2016 12:54				CALIBRATE			
45	1.00	0.10	Positive	5.00	1/12/2016 12:54				CALIBRATE			
46	0.20	0.30	Negative	1.00	1/12/2016 12:57	2	A	Exterior	Wall	Brick	Intact	Gray
47	3.90	0.30	Positive	1.00	1/12/2016 12:59	2	A	Exterior	Door	Metal	Intact	Gray
48	0.10	0.30	Negative	1.00	1/12/2016 13:01	2	D	Exterior	Wall	Brick	Poor	White
49	0.10	0.30	Negative	1.00	1/12/2016 13:02	2	C	Exterior	Wall	Brick	Poor	Red
50	1.10	0.10	Positive	5.00	1/12/2016 13:24	2	A	Room #1	Wall	Concrete	Intact	White
51	0.40	0.30	Negative	1.00	1/12/2016 13:25	2	B	Room #1	Wall	Concrete	Peeling	White
52	1.10	0.20	NULL	4.00	1/12/2016 13:27	2	C	Room #1	Wall	Concrete	Poor	White
53	1.20	0.20	NULL	3.00	1/12/2016 13:27	2	D	Room #1	Wall	Concrete	Poor	White
54	1.20	0.10	Positive	5.00	1/12/2016 13:27	2	D	Room #1	Wall	Concrete	Poor	White
55	0.40	0.30	Negative	1.00	1/12/2016 13:30	2	D	Room #1	Wall	Concrete	Poor	White
56	5.20	0.30	Positive	1.00	1/12/2016 13:35	2	A	Room #1	Wall	Plaster	Poor	White
57	4.50	0.30	Positive	1.00	1/12/2016 13:36	2	B	Room #1	Door	Wood	Poor	White
58	0.20	0.20	Negative	1.00	1/12/2016 13:37	2	B	Room #1	Window Case	Metal	Poor	White
59	0.10	0.30	Negative	1.00	1/12/2016 13:38	2	D	Room #1	Door Casing	Wood	Poor	White
60	0.30	0.30	Negative	1.00	1/12/2016 13:40	2	Ceiling	Room #1	Door Casing	Wood	Poor	White
61	0.20	0.30	Negative	1.00	1/12/2016 13:42	2	D	Room #3	Ceiling	Drywall	Poor	White
									Wall	Cinderblock	Intact	White

LEAD PAINT INSPECTION

Site: Producer's Dairy Foods
450 Belmont Avenue
Fresno, California

Project No. 16-7726
Site #1

Prepared for: BMY Construction

Date: Jan. 12, 2016

No.	Lead Lvl	± Prec	Results	Sec	Date Time	Building	Side	Room	Component	Substrate	Condition	Color
62	0.20	0.30	Negative	1.00	1/12/2016 13:43	2	Ceiling	Room #4	Ceiling	Drywall	Poor	White
63	0.50	0.30	Negative	1.00	1/12/2016 13:46	2	B	Room #5	Wall	Wood	Poor	Pink
64	0.10	0.30	Negative	1.00	1/12/2016 13:48	2	A	Room #6	Wall	Brick	Poor	White
65	0.40	0.30	Negative	1.00	1/12/2016 13:50	2	A		Soffit	Wood	Poor	Green
66	1.20	0.10	Positive	5.00	1/12/2016 13:54	2	A		Soffit	Wood	Poor	Blue
67	1.00	0.10	Positive	5.00	1/12/2016 13:55	2			CALIBRATE - BACK			
68	1.10	0.10	Positive	5.00	1/12/2016 13:55	2			CALIBRATE - BACK			
69	1.10	0.10	Positive	5.00	1/12/2016 13:56	2			CALIBRATE - BACK			

* Indications as to positive (POS) or negative (NEG) are based on comparison to 1.0 mg/cm².
Cal/OSHA regulates operations which disturb lead in any detectable amount.
Refer to the enclosed Cal/OSHA Regulation 8 CCR 1523.1 for requirements.

Appendix D

XRF Results for Lead

**Positive Reading in Excess of
1.0 mg/cm² Indicating Presence of
Lead-Based Paint**

LEAD PAINT INSPECTION

POSITIVE RESULTS

Site: Producer's Dairy Foods
450 Belmont Avenue
Fresno, California

Project No. 16-7726
Site #1

Prepared for: BMY Construction

Date: Jan. 12, 2016

No.	Lead Lvl	± Prec	Results	Sec	Date Time	Building	Side	Room	Component	Substrate	Condition	Color
4	11.30	0.30	Positive	1.00	1/12/2016 11:56	1	A	Room #1	Wall	Ceramic Tile	Intact	White
8	12.30	0.30	Positive	1.00	1/12/2016 12:03	1	B	Room #1	Wall	Ceramic Tile	Intact	White
9	10.00	0.30	Positive	1.00	1/12/2016 12:04	1	C	Room #1	Wall	Ceramic Tile	Intact	White
12	11.10	0.30	Positive	1.00	1/12/2016 12:07	1	D	Room #1	Wall	Ceramic Tile	Intact	White
15	10.60	0.30	Positive	1.00	1/12/2016 12:14	1	A	Room #2	Wall	Ceramic Tile	Intact	Green
16	10.40	0.30	Positive	1.00	1/12/2016 12:15	1	B	Room #2	Wall	Ceramic Tile	Intact	Green
23	4.60	0.30	Positive	1.00	1/12/2016 12:25	1	B	Room #3	Window Case	Wood	Intact	White
26	10.40	0.30	Positive	1.00	1/12/2016 12:29	1	A	Room #5	Wall	Ceramic Tile	Intact	Green
29	9.00	0.30	Positive	1.00	1/12/2016 12:31	1	B	Room #5	Wall	Ceramic Tile	Intact	White
47	3.90	0.30	Positive	1.00	1/12/2016 12:59	2	A	Exterior	Door	Metal	Intact	Gray
50	1.10	0.10	Positive	5.00	1/12/2016 13:24	2	A	Room #1	Wall	Concrete	Intact	White
54	1.20	0.10	Positive	5.00	1/12/2016 13:27	2	D	Room #1	Wall	Concrete	Poor	White
56	5.20	0.30	Positive	1.00	1/12/2016 13:35	2	A	Room #1	Door	Wood	Poor	White
57	4.50	0.30	Positive	1.00	1/12/2016 13:36	2	B	Room #1	Window Case	Metal	Poor	White
66	1.20	0.10	Positive	5.00	1/12/2016 13:54	2	A		Soffit	Wood	Poor	Blue

* Indications as to positive (POS) or negative (NEG) are based on comparison to 1.0 mg/cm².
Cal/OSHA regulates operations which disturb lead in any detectable amount.
Refer to the enclosed Cal/OSHA Regulation 8 CCR 1523.1 for requirements.

Appendix E

Calibration Check Test Results

T. BROOKS & ASSOCIATES, INC.
613 Harvard Avenue, Suite 201
Clovis, California 93612
(559) 298-9135 - office
(559) 298-2281 - fax

PROJECT NO. 16-7726

DATE 1/12/2016

CALIBRATION CHECK TEST RESULTS

TBA FORM #7

Address / Unit No. Producer's Dairy Foods
450 Belmont Avenue
Fresno, California
Name of Inspector Trevor Brooks
Device Niton XL 309
XRF Serial No. U1847NR3578

Calibration Check Tolerance Used 1.04

First Calibration Check

Red SRM 2573 Calibration Limit: 1.04 mg/cm ²			First Average	Difference between First Average and 1.04 mb/cm ² *
First Reading	Second Reading	Third Reading		
1.00	1.00	1.00	1.00	0.04

Second Calibration Check

Red SRM 2573 Calibration Limit: 1.04 mg/cm ²			Second Average	Difference between Second Average and 1.04 mb/cm ² *
First Reading	Second Reading	Third Reading		
1.10	0.90	1.00	1.00	0.04

Third Calibration Check

Red SRM 2573 Calibration Limit: 1.04 mg/cm ²			Third Average	Difference between Third Average and 1.04 mb/cm ² *
First Reading	Second Reading	Third Reading		
1.00	1.10	1.10	1.07	0.03

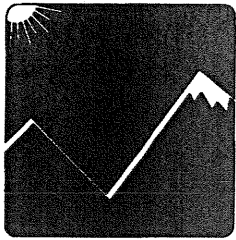
Fourth Calibration Check

Red SRM 2573 Calibration Limit: 1.04 mg/cm ²			Fourth Average	Difference between Fourth Average and 1.04 mb/cm ² *
First Reading	Second Reading	Third Reading		

* If the difference of the Calibration Check Average from the gray NIST SRM 1.04 mg/cm² film value is greater than the specified Calibration Check Tolerance for this device, consult the manufacturer's recommendations to bring the instrument back into control. Retest all testing combinations tested since the last successful Calibration Check test.

Appendix F

San Joaquin Valley Unified Air Pollution Control District Information & Forms



San Joaquin Valley Unified Air Pollution Control District

COMPLIANCE ASSISTANCE BULLETIN

July 2006

ASBESTOS REQUIREMENTS for DEMOLITION and RENOVATIONS

The San Joaquin Valley Air Pollution Control District (District) Rule 4002 requires compliance with the *National Emission Standards for Hazardous Air Pollutants* (NESHAP) regulation, 40 CFR, Part 61, Subpart M developed by the United States Environmental Protection Agency (EPA). The purpose of this bulletin is to provide an overview of the NESHAP notification, inspection and emission control requirements as they relate to asbestos.

SUMMARY

For any renovation or demolition of a regulated facility, you must do the following:

- **INSPECT:** Conduct a thorough asbestos inspection of the facility before:

Any renovation in which more than 160 square feet or more of building materials, or 260 linear feet or more of pipe insulation, will be disturbed at a regulated facility, or

Any demolition at a regulated facility. (See page 2 for the definition of demolition)

Regulated facilities (Facilities subject to the NESHAP) include all commercial building, residential buildings with more than four dwelling units, other structures and non-portable equipment. A single family dwelling or residential buildings with four or fewer units may be exempt, depending on its past use and future use of the property. The EPA has extensive policy on the NESHAP applicability to these structures. Contact the District to determine if your project is regulated.

- **ASBESTOS ABATEMENT:** If asbestos-containing material (ACM) is discovered, which will be disturbed during a renovation or demolition, they must be removed prior to those projects under most circumstances. Also, Cal-OSHA and Cal-EPA hazardous waste regulations apply in most cases.
- **NOTIFY:** Submit a complete asbestos notification form to the District for any regulated asbestos abatement project or demolition, 10 working days before the activity begins.

A **regulated asbestos abatement project** is one in which at least 160 Square feet of regulated asbestos-containing building materials (RACM) or 260 linear feet of asbestos-containing pipe insulation is disturbed.

Regulated demolitions are demolitions of "facilities" described above. Notification is required for any regulated demolition, whether or not asbestos is present.

- **FEES:** Pursuant to District Rule 3050, fees must be submitted to the District with all regulated renovations and demolitions notifications. Notifications received without the appropriate fee will be considered incomplete.

DEMOLITION PERMIT RELEASE FORM: Any demolition (regulated or not), for which a building department demolition permit is applicable, requires a completed Demolition Permit Release form. Building officials will require an approved copy of this form, signed by the District, prior to the issuance of a building department demolition permit.

SOME DEFINITIONS: 61.141

1. **FACILITIES** - Facilities subject to the rule include “all structures, installations, buildings and equipment, except for a single family dwelling (SFD) or a residential building with more than four dwelling units. However SFD or building with four or fewer units is also subject to the regulation if:
 - a. It has been used for, or is being removed to be replaced by a non-residential use, or
 - b. It is to be used as a training burn exercise.
 - c. Sites with more than one such building remodeled or demolished are always regulated.
2. **DEMOLITION** - In addition to the total destruction of a structure, demolitions include “the removal of any structural load-bearing member from a facility together with any related handling operations or the intentional burning of a building” (training burns conducted by a fire fighting agency only). Also, the separation of a structure from its foundation prior to relocation is a demolition.
3. **RENOVATION** - means “altering a facility or one or more facility components in any way, including the stripping or removal RACM from a facility component.” Renovations include all activities in which asbestos could be disturbed at a regulated facility, including the clean up and removal of debris from buildings which have burned.
4. **NON-FRIABLE ACM**
 - a. **Category I non-friable** is “asbestos-containing packing, gaskets, resilient floor covering and asphalt roofing products containing more than 1 percent asbestos as determined by PLM testing that, when dry, cannot be crumbled, pulverized, or reduced to powder by hand pressure.”
 - b. **Category II non-friable ACM** is “any ACM, excluding Category I ACM, containing more than 1 percent asbestos as determined by PLM testing, that when dry, cannot be crumbled, pulverized, or reduced to powder by hand pressure.”
5. **RACM - include:**
 - a. **Friable ACM**, which is any material containing more than 1 percent asbestos, as determined by Polarized Light Microscopy (PLM) testing, which, when dry, can be crumbled, pulverized, or reduced to powder by hand pressure.
 - b. **Category I nonfriable ACM** that is in poor condition and “has become friable” or “that has or will be subjected to sanding, grinding, cutting, or abrading.”
 - c. **Category II nonfriable ACM** that has a high probability of becoming or has become crumbled, pulverized, or reduced to powder by the forces expected to act on the material in the course of demolition or renovation.

INSPECTION: 61.145 (a)

An asbestos inspection must be performed by the owner or operator prior to:

- a. Any regulated demolition.
- b. Any renovation activity in which more than 160 square feet of building material or 260 linear feet of pipe insulation will be disturbed. An inspection is not necessary, however, if the material to be disturbed is stipulated to be asbestos containing and will be removed in accordance with the NESHAP.

Cal-OSHA regulations in the California Labor Code, 9021.5 through 9021.8, require that asbestos-consulting services (inspections) shall be performed by a person who is certified by Cal-OSHA, and who has taken and passed an EPA-approved Building Inspector course and performs the inspection according to the procedures outlined in the course.

The District requires that inspection reports (surveys) must include:

- a. A schematic showing the location of all tested materials.
- b. The following data for all asbestos-containing materials:
 1. The amount and description of each material.
 2. Percent asbestos content (10% and below must be point counted).
 3. Whether or not the material is friable.

A report of the asbestos inspection (survey) must be received with each demolition notification.

NOTIFICATION 61.145 (b)

A hard copy of the asbestos notification must be submitted to the District, at least 10 working days prior to:

- a. Any regulated demolition (see definitions of *demolition* and *facility* above).
- b. Any renovation in which more than 160 Square feet or 260 Linear feet of RACM will be disturbed.

The District notification form and instructions for filling it out are with the bulletin.

Notifications will not be complete, nor will the 10 working day notice period begin, until all of the required information and fees have been submitted to the District.

Notifications may be submitted by hand delivery, U.S mail or commercial courier. Facsimile and e-mails are not acceptable methods of delivery.

ASBESTOS ABATEMENT: 61.145 (c)

Asbestos-containing materials discovered during the inspection process, which will be disturbed during renovation or demolition, must be removed properly prior to the demolition or renovation. Employees engaged in asbestos abatement work must be properly trained and equipped for the work in accordance with Cal-OSHA regulations. The Cal-OSHA and NESHAP regulations have specific work practice requirements to be followed during the removal of these materials. Also, the NESHAP regulation and Cal-EPA have waste handling, transportation and disposal requirements applicable that must be adhered to.

SJVUAPCD Rule 3050 (Fees)

A nonrefundable fee must be paid with each demolition and renovation notification, in accordance with SJVUAPCD Rule 3050, Asbestos Removal Fees, which is attached. Fees for asbestos abatement projects are based on the amount of RACM removed. If a project involves at least 160 square feet, 260 linear feet and/or 35 cubic feet or more of RACM, fees for each quantity of material are determined and added together to arrive at the total fee for the project.

The fee for a demolition notification is \$124.

DEMOLITION PERMIT RELEASE FORM

CH & S Section 19827.5 requires city or county building officials to have proof of compliance with, or exemption from, the asbestos NESHAP notification requirements before they issues demolition permits. In order to facilitate this, the District has developed a Demolition Permit Release form (attached). For facilities subject to the NESHAP, the District will issue a Demolition Permit Release form once it has been properly noticed of the work that is to occur. *The Signed release form does not guarantee that asbestos abatement or demolition work is being done properly.* For all demolitions, including facilities exempt from the NESHAP, the applicant must fill out the Demolition Permit Release form and have it signed by the District before obtaining a building department demolition permit. The District allows facsimile transmittal of release forms.

RECYCLING/WASTE DISPOSAL

In addition to waste disposal information about RACM, the asbestos notification must identify any building materials, which will be recycled after removal from a project. The name of the recycling contractor and location of such activity must be identified.

No asbestos containing or asbestos contaminated material may be recycled.

If you have any questions, we encourage you to contact one of our three regional offices.

Northern region

Merced, San Joaquin and
Stanislaus Counties

4800 Enterprise Way,
Modesto, CA 95356

(209) 557-6400
Fax (209) 557-6475

Central Region

Fresno, Kings and Madera
Counties

1990 Gettysburg Avenue,
Fresno, CA 93726

(559) 230-6000
Fax (559) 230-6062

Southern Region

Kern and Tulare
Counties

34946 Flyover Court
Bakersfield, CA 93308

(661) 392-5500
Fax (661) 392-5586

RULE 3050 ASBESTOS REMOVAL FEES (Adopted May 21, 1992; Amended December 17, 1992; Amended February 18, 1993; Amended August 21, 1997; Amended January 17, 2008; Amended April 16, 2015, effective July 1, 2015)

Note: This rule is effective on and after July 1, 2015.

1.0 Applicability

The National Emission Standards for Hazardous Air Pollutants (NESHAP), adopted by reference as District Rule 4002, and therefore these fees are applicable to:

- 1.1 all demolitions whether or not asbestos is present; and
- 1.2 renovations in which 260 linear feet, 160 square feet, or 35 cubic feet or more of regulated asbestos containing materials are disturbed.

2.0 Fees

Every person filing notification of an asbestos removal project, subject to the provisions of Rule 4002 (National Emissions Standards for Hazardous Air Pollutants), shall pay upon filing, the nonrefundable fee prescribed herein. The total fee for any project shall be the sum of the applicable fee components below.

Demolition or Renovation:

Linear Feet	Square Feet	Cubic Feet	Fee Component (\$)
0 - 259*	0 - 159*	0 - 34*	170
260 - 499	160 - 499	35 - 109	170
500 - 999	500 - 999	110 - 218	289
1,000 - 2,499	1,000 - 2,499	219 - 547	578
2,500 - 4,999	2,500 - 4,999	548 - 1,094	960
5,000 - 9,999	5,000 - 9,999	1,095 - 2,188	1,440
10,000 or more	10,000 or more	2,189 or more	1,921

* Demolition only. Does not apply to renovations.

San Joaquin Valley Unified Air Pollution Control District

ASBESTOS DEMOLITION/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. The form below may be used to fulfill this requirement. Only complete notification forms are acceptable. Incomplete notification may result in enforcement action.

The notification must be postmarked or delivered no later than ten working days prior to the beginning of the asbestos removal activity (dates specified in section 7) or demolition (dates specified in Section 8). Please submit this form and corresponding fees to the appropriate office:

For Fresno, Madera and Kings Counties:

SJVUAPCD

Attention: Asbestos Program
1990 E. Gettysburg Avenue
Fresno, California 93726

For San Joaquin, Stanislaus and Merced Counties:

SJVUAPCD

Attention: Asbestos Program
4800 Enterprise Way
Modesto, CA 95356

For Tulare and Kern Counties:

SJVUAPCD

Attention: Asbestos Program
34946 Flyover Court
Bakersfield, CA 93308

INSTRUCTIONS

1. Type of Notification: Check Original if the notification is a first time or original notification; Revised (Dates) if the notification is a revision dates only; Revised (Others) if the notification is a revision of other data (highlight changes); Canceled if the project has been canceled; or "Courtesy" if the activity is not regulated. When submitting a revised notification add a number (starting with the number 1) after "revised" to differentiate between revisions.
2. Type of Operation: Check for facility demolition, ordered demolition, facility renovation, or Emergency renovations.
3. 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 the site in the event that the address alone is inadequate.

Present Use/Prior Use/Future Use: Describe the primary use of the facility or enter the following: Hospital; School; Public Building; Office; Industrial; University or College; Ship; Commercial; Residence; or Subdivision.
4. Is Asbestos Present? Answer "Yes" or "No" regardless of the amount or type of asbestos.
5. Include a complete asbestos report (survey) that accurately depicts amounts, percent, analytical method used
6. Approximate Amount of Asbestos including: (1) Regulated ACM to be removed (including non-friable ACM to be sanded, ground or abraded); (2) Category III ACM not removed; and for "courtesy notices" (3) Non-friable ACM to be removed. Enter amounts in square feet or linear feet. Describe volume in cubic feet only if the amount cannot be approximated in square feet or linear feet.
7. Removal Dates (MM/DD/YY): Enter scheduled dates for asbestos removal work. Asbestos removal work includes any activity, including site preparation, which will break up, dislodge or disturb asbestos material.
8. Demo/Renovation Dates (MM/DD/YY): Enter scheduled dates for beginning and ending the planned demolition or renovation.
9. FACILITY OWNER INFORMATION: Enter the name of the site supervisor and contact person for the notification. If additional parties share responsibility for the site, demolition activity, renovations or ACM removal, include complete information (including name, address, contact person and telephone number) below.
10. Removal Contractor: Contractor hired to remove asbestos.
11. Other Contractor: Demolition contractor, general contractor, or any other person, who leases, operates, controls or supervises the site.

12. Description of Planned Demolition or Renovation Work and Method(s) to be Used: Include in this area a description of the demolition and renovation techniques to be used and the types of facility components and materials which will be affected by this work.
13. Description of Engineering Controls and Work Practices to be Used to Prevent Emissions at the Site: Describe the work practices and engineering controls selected to ensure compliance with the requirements of the regulations, including both asbestos removal and waste-handling emission control procedures.
14. ACWM Transporter(s): Enter the names, 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." If additional parties are responsible include complete information on an additional sheet submitted with the form.
15. ACWM 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.
16. Recycling of Waste Material (No ACM may be recycled): Identify the site, including the complete name, location and telephone number of the facility, where any material is to be taken for recycling.
17. If Demolition Ordered by a Government Agency, Please Identity the 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. A copy of the order shall be attached to the notification.
18. For Emergency Renovation: 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.
19. 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.
20. Certification of Presence of Trained Supervisor: The notifier must certify that a person trained in asbestos-removal procedures will supervise the demolition or renovation. The supervisor is responsible for the activity on-site. Evidence that the supervisor has completed the training must be available for inspection during normal business hours.
21. Verification: Please certify the accuracy and completeness of the information provided by signing and dating the notification form.

San Joaquin Valley Unified Air Pollution Control District

Asbestos Notification

Operator Project #	Postmark Date	Received Date	Fee Received \$	District Notification #
Completed by:		Company:		Phone:
1. TYPE OF NOTIFICATION:	Original <input type="checkbox"/>	Revised (Dates) <input type="checkbox"/>	Revised (Others) <input type="checkbox"/> (Highlight Changes)	Canceled <input type="checkbox"/> Courtesy <input type="checkbox"/>
2. TYPE OF OPERATION:	Demo <input type="checkbox"/>	Ordered Demo <input type="checkbox"/>	Renovation <input type="checkbox"/>	Emergency Renovation <input type="checkbox"/>
3. FACILITY DESCRIPTION: (Include building name, number, and floor or room number)				
Building Name:			Lease Name:	
Address:			City:	County:
Site Location on property:				
Is demolition in preparation for construction? <input type="checkbox"/> Yes <input type="checkbox"/> No		Building Size:	Sq Ft	Number of Floors: Age:
Present Use:		Prior Use:		Future Use:
4. IS ASBESTOS PRESENT: <input type="checkbox"/> Yes <input type="checkbox"/> No SURVEY COMPLETED: <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> TO BE CONDUCTED				
5. A COPY OF THE INSPECTION REPORT WITH PROCEDURE, INCLUDING ANALYTICAL METHOD USED TO DETECT THE PRESENCE OF ASBESTOS MATERIAL MUST BE INCLUDED WITH THIS NOTIFICATION.				
6. Approximate amount of asbestos, including: 1. Regulated ACM to be removed. 2. Category I/II ACM not removed. 3. Non-friable ACM to be removed.		(1) RACM to be removed	Friable ACM (<1%)	(2) Non-friable ACM not to be removed Category I Category II
				(3) Non-friable ACM to be removed (Courtesy) Category I Category II
Pipes (Linear Feet)				
Surface Area (Square Feet)				
Volume (Cubic Feet-If Lnt Or Sqft Could Not Be Measured)				
ASBESTOS REMOVED FROM	Surfaces: <input type="checkbox"/> Yes <input type="checkbox"/> No		Pipes: <input type="checkbox"/> Yes <input type="checkbox"/> No	Components: <input type="checkbox"/> Yes <input type="checkbox"/> No
AMOUNT OF EACH TYPE OF ASBESTOS (in square feet)	Acoustic ceiling	Sheet Vinyl	Insulation	Fire Proofing
				Ducting
				Stucco
				Mastic
Floor Tile (VAT)	Dry Wall	Plaster	Transite	Roofing
				Others (Describe)
7. REMOVAL DATES: (MM/DD/YY)		Start:		Complete:
8. DEMO/RENOVATION DATES (MM/DD/YY)		Start:		Complete:
9. FACILITY OWNER INFORMATION:				
Address:		City:		State: Zip:
Contact:		Telephone:		Site Supervisor:
10. REMOVAL CONTRACTOR:			CAL-OSHA REGISTRATION #:	
Address:		City:		State: Zip:
Contact:		Telephone:		Site Supervisor:
11. OTHER CONTRACTOR:			CSLB LICENSE #:	
Address:		City:		State: Zip:
Contact:		Telephone:		Site Supervisor:

12. DESCRIPTION OF PLANNED DEMOLITION OR RENOVATION WORK, AND METHOD(S) TO BE USED:			
13. DESCRIPTION OF WORK PRACTICES AND ENGINEERING CONTROLS TO BE USED TO PREVENT ASBESTOS EMISSIONS AT THE SITE:			
14. ACWM WASTE TRANSPORTER:			
Address:		City:	State: Zip:
Contact:		Telephone:	
15. ACWM WASTE DISPOSAL SITE:			
Address:		City:	State: Zip:
Contact:		Telephone:	
16. RECYCLING OF WASTE MATERIAL (<u>NO ACM MAY BE RECYCLED</u>):			
Name:			
Location:		City:	State: Zip:
Contact:		Telephone:	
17. DEMOLITION ORDERED BY A GOVERNMENT AGENCY; identify the agency, attach copy of the order)			
Name:		Title:	
		Authority:	
Date of order (MM/DD/YY):		Date order to begin: (MM/DD/YY):	
18. FOR EMERGENCY RENOVATIONS:			
GIVE THE NAME AND PHONE NUMBER OF THE PERSON DECLARING/AUTHORIZING THE EMERGENCY, DATE AND HOUR OF EMERGENCY AND DESCRIPTION OF THE SUDDEN, UNEXPECTED EVENT:			
EXPLANATION OF HOW THE EVENT CAUSED UNSAFE CONDITIONS OR WOULD CAUSE EQUIPMENT DAMAGE OR AN UNREASONABLE FINANCIAL BURDEN:			
19. DESCRIPTION OF PROCEDURES TO BE FOLLOWED IN THE EVENT THAT UNEXPECTED ASBESTOS IS FOUND OR PREVIOUSLY ON-FRIABLE ASBESTOS MATERIAL BECOMES CRUMBLLED, PULVERIZED, OR REDUCED TO POWDER:			
20. IF RACM IS PRESENT AN INDIVIDUAL TRAINED IN THE PROVISIONS OF THIS REGULATION (40 CFR., PART 61, SUBPART M) WILL BE ON SITE DURING THE DEMOLITION OR RENOVATION AND EVIDENCE THAT THE REQUIRED TRAINING HAS BEEN ACCOMPLISHED BY THIS PERSON WILL BE AVAILABLE FOR INSPECTION.			
21. I CERTIFY THAT THE ABOVE INFORMATION IS CORRECT TO THE BEST OF MY KNOWLEDGE.			
PRINT NAME OF OWNER/OPERATOR		SIGNATURE OF OWNER/OPERATOR	DATE

Category I non-friable asbestos-containing material (ACM) means asbestos-containing packings, gaskets, resilient floor covering, and asphalt roofing products containing more than 1 percent asbestos.

Category II non-friable ACM means any material, excluding Category I non-friable ACM, containing more than 1 percent asbestos.

Regulated asbestos-containing material (RACM) means (a) Friable asbestos material, (b) Category I nonfriable ACM that has become friable, (c) Category I nonfriable ACM that will be or has been subjected to sanding, grinding, cutting, or abrading, or (d) Category II nonfriable ACM that has a high probability of becoming or has become crumbled, pulverized, or reduced to powder by the forces expected to act on the material in the course of demolition or renovation operations regulated by this subpart.

SAN JOAQUIN VALLEY UNIFIED AIR POLLUTION CONTROL DISTRICT

☐ **Northern Region Office**
4800 Enterprise Way
Modesto, CA 95356-8718
(209) 557-6400 ♦ FAX (209) 557-6475
(San Joaquin, Stanislaus and Merced Counties)

☐ **Central Region Office**
1990 East Gettysburg Avenue
Fresno, CA 93726-0244
(559) 230-6000 ♦ FAX (559) 230-6062
(Fresno, Madera and Kings Counties)

☐ **Southern Region Office**
34946 Flyover Court
Bakersfield, CA 93308-9725
(661) 392-5500 ♦ FAX (661) 392-5585
(Tulare and Kern Counties)

DEMOLITION PERMIT RELEASE

The purpose of this form is to verify compliance with or exemption from the National Emission Standards for Hazardous Air Pollutants (NESHAP) asbestos **notification** requirements. It is the Applicant's responsibility to obtain the required signature from the District and return this form to the appropriate city or county building department **prior to obtaining a demolition permit.**

Project Description

Job Site Address: _____			City: _____			Zip Code: _____		
Owner's name: _____			Telephone: _____			Fax: _____		
Owner's Address: _____			City: _____			Zip Code: _____		
Contractor's Name: _____			Telephone: _____			Fax: _____		
Contractor's Address: _____			City: _____			Zip Code: _____		

1. Structure(s) being demolished:	Yes	No	2. Proposed project:	Yes	No
One structure (non-commercial), with four or fewer units.	<input type="checkbox"/>	<input type="checkbox"/>	Single Family Dwelling	<input type="checkbox"/>	<input type="checkbox"/>
			Subdivision, Retail or Commercial Project	<input type="checkbox"/>	<input type="checkbox"/>
Other (describe): _____			Public Project (School, Highway, etc..)	<input type="checkbox"/>	<input type="checkbox"/>
Is demolition by intentional burning?	<input type="checkbox"/>	<input type="checkbox"/>	Other (describe): _____		

Comments: _____

Signature of applicant _____

Title _____

Date _____

FOR SJVUAPCD USE ONLY

☐ This certifies that the demolition applicant has satisfied the APCD's notification requirements. The APCD allows the demolition to proceed on or after _____, 20____.

☐ This certifies that the Demolition application is exempt from the APCD's requirements.

District approval on this form only indicates compliance with or exemption from the NESHAP notification requirements. Enforcement action will be taken if asbestos NESHAP violations are found at the project.

Further, there are other agencies that regulate the handling and disposal of ACM, such as OSHA, Cal-OSHA, and DTSC regardless of NESHAP applicability to your property.

Comments: _____

Printed Name: _____

Title: _____

Approval Signature: _____

Date: _____

SAN JOAQUIN VALLEY UNIFIED AIR POLLUTION CONTROL DISTRICT

☐ Northern Region Office

4800 Enterprise Way
Modesto, CA 95356-8718
(209) 557-6400 ♦ FAX (209) 557-6475
(San Joaquin, Stanislaus and Merced Counties)

☐ Central Region Office

1990 East Gettysburg Avenue
Fresno, CA 93726-0244
(559) 230-6000 ♦ FAX (559) 230-6062
(Fresno, Madera and Kings Counties)

☐ Southern Region Office

34946 Flyover Court
Bakersfield, CA 93308-9725
(661) 392-5500 ♦ FAX (661) 392-5586
(Tulare and Kern Counties)

RENOVATION PERMIT RELEASE

District Rule 4002 adopts the National Emission Standards for Hazardous Air Pollutants (NESHAP) asbestos regulation. This rule requires that subject facilities be inspected for asbestos prior to remodeling. Regulated asbestos-containing materials (RACM) must be removed prior to remodeling work. Furthermore, a signed **Demolition** Permit Release form is required prior to obtaining a building department demolition permit.

Project Description

Job Site Address:	City:	Zip Code:
Owner's name:	Telephone:	Fax:
Owner's Address:	City:	Zip Code:
Contractor Name:	Lic.#:	Telephone:
Contractor Address:	City:	Zip Code:
Contractor Contact:	Telephone:	Fax:
Facility being remodeled:	Yes	No
Single Family Dwelling or Apartment with four or fewer units.	<input type="checkbox"/>	<input type="checkbox"/>
Other (Describe):		
Asbestos Compliance:	Yes	No
1. Will any load-supporting structural member be removed?	<input type="checkbox"/>	<input type="checkbox"/>
2. Will 160 square feet of building materials or 260 linear feet of pipe insulation be disturbed?	<input type="checkbox"/>	<input type="checkbox"/>
3. Has an asbestos survey has been completed?	<input type="checkbox"/>	<input type="checkbox"/>
4. Is regulated asbestos-containing material (RACM) present?	<input type="checkbox"/>	<input type="checkbox"/>
5. Will >160 square feet or >260 linear feet of RACM be removed? <i>If yes, APCD notification must be submitted.</i>	<input type="checkbox"/>	<input type="checkbox"/>
Comments:		

Be advised that Regulation VIII, Fugitive PM10 Prohibitions, requires that the exterior of buildings be wetted during demolition and debris wetted during loading activities. Rule 8020, § 5.1.1.1 & § 5.1.1.3.

Signature of applicant

Title

Date

FOR SJVUAPCD USE ONLY

☐ Information provided indicates that District asbestos abatement requirements have been met.

☐ This certifies that the renovation project is exempt from the District's asbestos requirements.

District approval on this form only indicates compliance with or exemption from the NESHAP asbestos requirements, based on information submitted. It does not indicate that the District has verified this compliance by field inspection. Enforcement action will be taken if asbestos NESHAP violations are found at the project.

Printed Name: _____

Title: _____

Approval Signature: _____

Date: _____

This form is no longer valid 30 days after approval or if information provided changes.

Appendix G

Regulatory Resource List for Asbestos & Lead Regulations

REGULATORY RESOURCE LIST – ASBESTOS

California Occupational Safety & Health Administration (Cal/OSHA):

8 CCR 1529 Asbestos in Construction Standard

Websites: <http://www.dir.ca.gov/title8/1529.html> (Regulation)

<http://www.dir.ca.gov/dosh/ACRU/ACRUhome.html> (Report of Use)

Summary of Regulation:

1. Regulates Friable and Non-Friable ACMs which contain asbestos in excess of 0.1% by weight.
2. Applicable to workers engaged in disturbance of ACM (>1.0%) and ACCM (0.1 - 1.0%) and workers in close proximity to the work area.
3. Contractors who disturb in excess of 100 sq. ft. must be a “Certified Abatement Contractor” with the State of California Contractors State License Board and have an ASB attachment on their license with the exception of flooring, roofing, and asbestos-cement products.
4. Contractors that disturb less than 100 sq. ft. must also file a “Report of Use” with the State of California.
5. Contractors who disturb any amount of ACM must ensure worker protection by providing accredited training, medical surveillance, PPE and a negative exposure assessment.
6. All work must be conducted in accordance with the regulation.

NESHAP Regulation – United States Environmental Protection Agency:

40 CFR Part 6, Subpart M- National Emission Standard for Asbestos

Website: <http://www.epa.gov/asbestos/pubs/asbreg.html>

Summary of Regulation:

1. Regulates renovation projects on all commercial structures, certain residential properties, and multi-family properties with four (4) or more units.
2. Has jurisdiction over projects involving disturbance of greater than 160 sq. ft. or 260 lin. ft. of ACM (>1.0%) or “Presumed Asbestos-Containing Material.”
3. Regulates all demolition, regardless of whether asbestos is present on targeted structures.
4. Enforced by local air quality management district or EPA region office in non-delegated districts.

San Joaquin Valley Air Pollution Control District

Website: <http://www.valleyair.org/busind/comply/asbestosbuln.htm>

Summary of Regulation:

1. Enforces NESHAP regulation.
2. Requires filing of completed notification, payment of fees, and ten (10) day waiting-period prior to commencing abatement related work in excess of threshold levels of RACM, non-friable ACM which may become friable, and for all demolition activities.
3. Requires that an asbestos survey be conducted and prepared by a Certified Asbestos Consultant and that a copy be submitted to the air district along with the completed notification.

REGULATORY RESOURCE LIST – LEAD

California Occupational Safety & Health Administration (Cal/OSHA): 8 CCR 1532.1 (Lead in Construction Standard)

Website: http://www.dir.ca.gov/title8/1532_1.html

Summary of Regulation:

1. Regulates all work-related activities in which workers may be exposed to lead and any workers in close proximity to the work area.
2. Regulated levels of lead are based on level of training and experience of contractor and maintenance of historical data based on initial exposure assessments for individual “trigger tasks”.
3. Contractors that disturb in excess of 100 sq. ft. must file a “Temporary Jobsite Notification” with the local Cal/OSHA Compliance Office at least 24 hours prior to start of work.
4. Contractor shall be licensed with the State of California, Contractors State License Board and have provided all employees who will engage in the work or enter a lead “regulated area” with level of training commensurate with anticipated exposure level.
5. Employees are required under certain circumstances to be certified by the State of California Department of Public Health (CDPH) to conduct lead work.
6. The employer or contractor must send notification prior to the start of the job unless:
 - the lead content of the material disturbed is less than 0.5 percent, (5,000 parts per million) or 1.0 mg./cm²;
 - the amount of lead-containing material is less than 100 square feet or 100 linear feet;
 - the only task is torch cutting or welding for no longer than one hour per shift.
7. Contractors who disturb any amount of lead must ensure worker protection by providing accredited training, medical surveillance, PPE and conduct an initial exposure assessment per “trigger task”.
8. Employers are required to conduct biological monitoring on employees based on the schedule mandated by OSHA.

State of California – Department of Public Health – Title 17, Division 1, Chapter 8

Website: <http://www.cdph.ca.gov/programs/CLPPB/Documents/Title17.pdf>

Summary of Regulation:

1. Regulates projects involving disturbance of “Lead-Based Paint” on public and residential structures.
2. If conducting “Abatement”, defined as work designed to reduce or eliminate lead hazards, only CDPH accredited workers and supervisor may conduct the work, and a completed 8551 form shall be filed with CDPH a minimum of five (5) days prior to commencing abatement operations.
3. For work classified as “Abatement”, a Lead Clearance is required. Standard includes a minimum standard for performance of work and states that all lead related work shall be conducted in accordance with the HUD Guidelines.

HUD Guidelines

Website:

http://portal.hud.gov/hudportal/HUD?src=/program_offices/healthy_homes/lbp/hudguidelines

A standard developed by the Department of Housing and Urban Development which has generally been adopted as “state of the art” in the lead industry. This standard has been adopted by the State of California as a regulatory requirement.

U.S. Environmental Protection Agency

Repair, Renovation & Painting Rule

Website: www.epa.gov/lead/pubs/renovation.htm

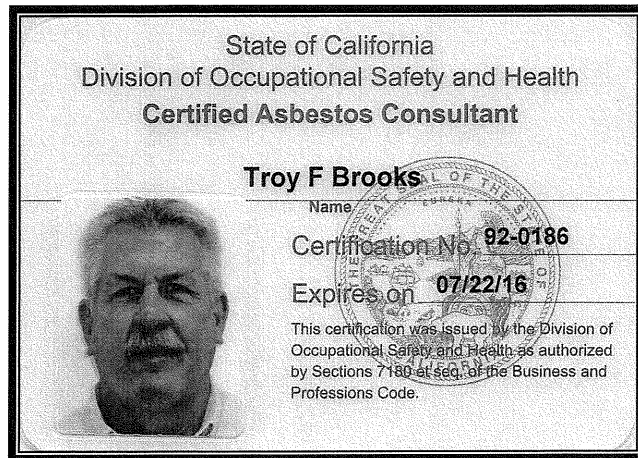
Summary of Regulation:

1. Regulates all contractors that engage in work involving disturbance of lead in pre-1978 residential housing and child-occupied facilities.
2. Requires that painted finishes to be impacted by proposed scope of work must be tested to determine if they are classified as “Lead-Based Paint” or presumed as such.
3. Requires that contractors utilize lead safe work practices.
4. In California, only a CDPH certified Inspector/Assessor may test for the presence of Lead-Based Paint.
5. Contractors must provide a copy of the “Renovate Right” pamphlet to owners or occupants of properties prior to commencing work which falls under the regulation.
6. Each job regulated under the RRP requires at least one RRP Certified Renovator be present on any job which falls under the regulation. In addition, each firm must also be RRP certified.
7. Regulation allows contractors to conduct their own clearance test known as a “Cleaning Verification”.
8. The homeowner may elect to hire a “third-party” consultant to conduct clearance testing on their behalf.

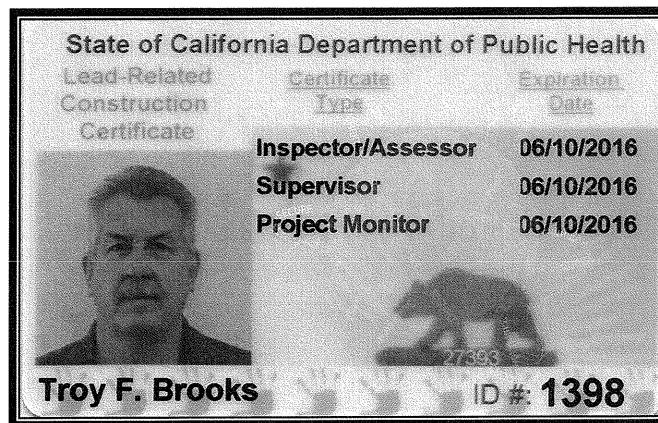
Appendix H

Certifications

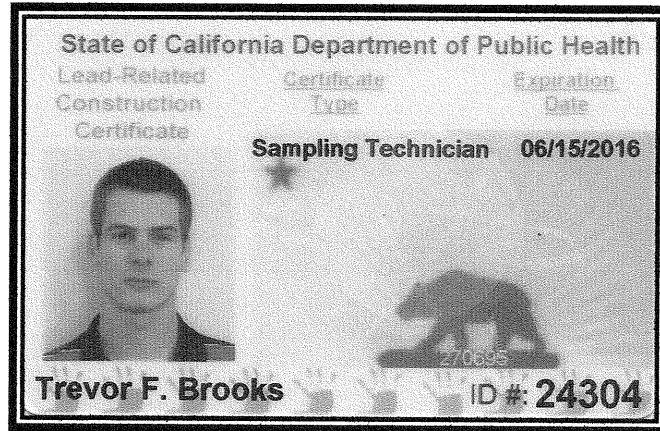
- Professional**
- Laboratory**



Troy F. Brooks
Certified Asbestos Consultant

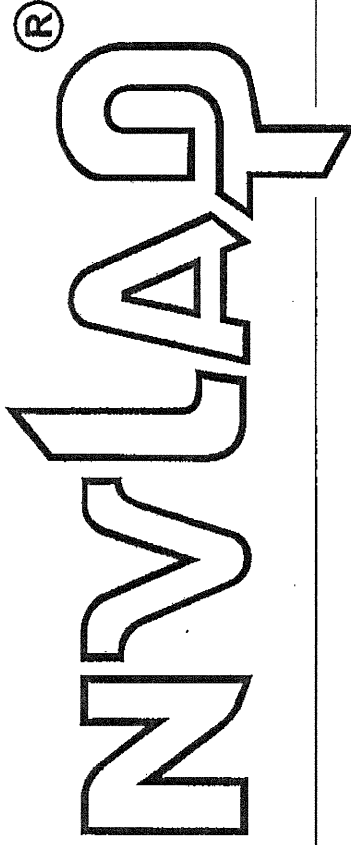


Troy F. Brooks
CDPH Lead Accredited
- Inspector / Assessor
- Supervisor
- Project Monitor



Trevor F. Brooks
Certified Lead Sampling Technician

United States Department of Commerce
National Institute of Standards and Technology



Certificate of Accreditation to ISO/IEC 17025:2005

NVLAP LAB CODE: 101926-0

EMC Labs, Inc.
Phoenix, AZ

is accredited by the National Voluntary Laboratory Accreditation Program for specific services,
listed on the Scope of Accreditation, for:

BULK ASBESTOS FIBER ANALYSIS

*This laboratory is accredited in accordance with the recognized International Standard ISO/IEC 17025:2005.
This accreditation demonstrates technical competence for a defined scope and the operation of a laboratory quality
management system (refer to joint ISO-ILAC-IAF Communique dated January 2009).*

2015-07-01 through 2016-06-30

Effective dates



For the National Institute of Standards and Technology



**National Voluntary
Laboratory Accreditation Program**



SCOPE OF ACCREDITATION TO ISO/IEC 17025:2005

EMC Labs, Inc.
9830 S. 51st St. Suite B-109
Phoenix, AZ 85044-5677
Mr. Kurt A. Kettler
Phone: 480-940-5294 Fax: 480-893-1726
E-Mail: kkettler@earthlink.net
URL: <http://www.emclabs.com>

BULK ASBESTOS FIBER ANALYSIS (PLM)

NVLAP LAB CODE 101926-0

<i>NVLAP Code</i>	<i>Designation / Description</i>
18/A01	EPA 600/M4-82-020: Interim Method for the Determination of Asbestos in Bulk Insulation Samples
18/A03	EPA 600/R-93/116: Method for the Determination of Asbestos in Bulk Building Materials

2015-07-01 through 2016-06-30

Effective dates

For the National Institute of Standards and Technology