Brunelle & Clark Consulting, LLC

ASBESTOS SURVEY
& LEAD PAINT SAMPLING
FOR DEMOLITION OF THE BUILDING
LOCATED AT 40600 HWY 299
WILLOW CREEK, CA

May 3, 2024

Project # 2403401

Prepared for:
Willow Creek Community
Services District
Attn: Susan O'Gorman, PE
General Manager
135 Willow Road
Willow Creek, CA 95573
(530) 629-2136

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

ASBESTOS SURVEY
& LEAD PAINT SAMPLING
FOR DEMOLITION OF THE BUILDING
LOCATED AT 40600 HWY 299
WILLOW CREEK, CA

Project # 2403401

Prepared for:
Willow Creek Community
Services District
Attn: Susan O'Gorman, PE
General Manager
135 Willow Road
Willow Creek, CA 95573
(530) 629-2136

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

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

May 3, 2024

ASBESTOS SURVEY
& LEAD PAINT SAMPLING
FOR DEMOLITION OF THE BUILDING
LOCATED AT 40600 HWY 299
WILLOW CREEK, CA

TABLE OF CONTENTS

APPENDICES

ASBESTOS SURVEY
& LEAD PAINT SAMPLING
FOR DEMOLITION OF THE BUILDING
LOCATED AT 40600 HWY 299
WILLOW CREEK, CA

1.0 PURPOSE

On March 29, 2024, this office conducted an asbestos and lead survey for demolition of the commercial building located at 40600 Hwy 299, in Willow Creek, CA.

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

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

Representative paint sampling for lead was conducted to provide for compliance with the Cal/OSHA Lead in Construction Standard Title 8, CCR Section 1532.1; and the California Code of Regulations Title 17, CCR 35000-36100.

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

2.0 EXECUTIVE SUMMARY

The asbestos survey includes all suspect materials on the interior, exterior, and roof of the subject building, and the concrete and asphalt within the immediate vicinity of the building.

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

Asbestos Survey

During the asbestos survey, 114 bulk samples were collected from suspect materials, and submitted for laboratory analysis of asbestos content.

Five (5) types of materials were found to contain asbestos, and one material type is presumed to contain asbestos.

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

Lead Paint Sampling

The lead paint sampling was conducted using a portable XRF (X-ray fluorescence) paint analyzer, which was used to measure lead content in paint coatings of 45 components on the interior and exterior of the project building.

All sampled components were found to be lead free, or to have trace unquantifiable lead content. Demolition of the building can be conducted without lead related restrictions.

3.0 ASBESTOS SURVEY

During this survey, a total of one hundred and fourteen (114) bulk samples were collected from suspect materials and submitted for the laboratory analysis of asbestos content. A description of all samples, and sample locations are contained in Table 1, Appendix B. All sample locations are indicated on Figures 1-4, Appendix A.

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

Five (5) types of materials tested positive for asbestos by the initial PLM analyses. Samples of one type of material were re-submitted for verification of the percent asbestos content by 400 Point Count analyses. The 400 Point Count analysis lab report is located at the end of the PLM lab report, and before the Chain of Custody form, Appendix C. The Point Count analysis data is summarized below.

400 Point Count Analyses

Sample ID#	Material	Initial PLM Result	Point Count Result
406- 81	Window putty, red	<1% CH	0.5% CH
406- 83	Window putty, gray	<1% CH	1.3% CH
406- 84	Window putty, white	2% CH	1.9% CH

CH = Chrysotile Asbestos

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

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

Asbestos was found present in six (6) types of building materials, and presumed to be in one other type of material. The asbestos materials identified during this survey are listed by category below.

Four (4) materials are categorized as Asbestos Containing Material (ACM), and are listed below.

ACM

- **Vinyl floor tile (VFT), tan with brown splotches** (mastic negative)
- **Sink pan undercoat, black**
- **Window putty** (all types & colors)
- **Tar roof patch** (all tar roof patch)

One (1) material is categorized as friable NESHAP Regulated ACM (RACM), and is listed below.

RACM

- **Sheet flooring, tan mosaic**

One type of material has potential to contain asbestos, but was not sampled during this survey. The following materials or areas must be presumed to contain asbestos.

PACM

- **Heat shields and internal mounting boards in electrical panels (all electrical panels)**

  Note: materials on the interior of electrical panels are not sampled due to electrical hazards.

The project ACM and/or ACCM are listed in Table 2 below, including location, asbestos content, the agency categorization, abatement requirements, and waste categorization. The locations of the project ACM/ACCM are shown on Figures 6 & 7, Appendix A.

TABLE 2
ASBESTOS IDENTIFICATIONS & CLASSIFICATIONS

40600 Hwy 299
Willow Creek, CA

MATERIAL	LOCATION	QUANTITY	ASBESTOS CONTENT & TYPE	OSHA CLASSIFICATION	NESHAP CATEGORY	WASTE DISPOSAL CLASSIFICATION
Sheet flooring, tan mosaic Note: the underlaying brown sheet flooring is inseparable and contaminated	**BA1,** 2nd flooring layer down, under top sheet flooring layer and plywood, on top of bottom layer of sheet flooring (See Fig. 6)	Approx. 60 SF	20% CH	ACM, Class II abatement required where disturbed	"Friable" RACM	"Friable" asbestos waste
Vinyl floor tile (VFT), tan with brown splotches (mastic negative)	**R9,** small section of patch flooring in the south-east corn of the room, under carpet, on plywood (See Fig. 6)	Approx. 18 SF	VFT= 2% CH Mastic= NAD	ACM, Class II abatement required where disturbed	Category I Non-Friable ACM Not RACM*	Non-friable asbestos waste
Sink pan undercoat, black	**R9,** on the underside of the metal sink pan (See Fig. 6)	Approx. 6 SF	2% CH	ACM, Class II abatement required where disturbed	Category I Non-Friable ACM Not RACM*	Non-friable asbestos waste
Window putty, red, gray & white (all window putty is ACM)	**Exterior,** on 2 windows on the west side, and 2 windows on the south side (See Fig. 6)	Approx. 40 SF (4 windows)	<1-2% CH by initial PLM 0.5-1.9% by 400 Point Count	ACM, Class II abatement required where disturbed	Category I Non-Friable ACM Not RACM*	Non-friable asbestos waste
Tar roof patch, gray (all roof patch is ACM)	**Roof,** on and around septic vents, exhaust vents & HVAC unit curbs (See Fig. 7)	Approx. 35 SF	5% CH	ACM, Class II abatement required where disturbed	Category I Non-Friable ACM Not RACM*	Non-friable asbestos waste

TABLE 2
ASBESTOS IDENTIFICATIONS & CLASSIFICATIONS

40600 Hwy 299
Willow Creek, CA

MATERIAL	LOCATION	QUANTITY	ASBESTOS CONTENT & TYPE	OSHA CLASSIFICATION	NESHAP CATEGORY	WASTE DISPOSAL CLASSIFICATION
Electrical Panel Heat Shiels & Mounting Blocks	**R2 & R7,** on the wall **Exterior,** on the south side (See Fig. 6)	Approx. 3 panels	PACM	ACM, Class II abatement required where disturbed	Category I Non-Friable ACM Not RACM*	Non-friable asbestos waste

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

ACM = Asbestos Containing Materials, containing >1% asbestos

CH = Chrysotile Asbestos

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

NA = Not Applicable

NAD = No asbestos detected

PACM = Presumed ACM

RACM = Regulated ACM under NESHAP regulations

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

SF = Square Feet

TBD = To be determined

4.0 CONCLUSIONS AND REGULATORY REQUIREMENTS FOR ASBESTOS

Conclusions

Asbestos was identified in five types materials, and presumed to be in one other type of material.

All asbestos containing materials must be abated prior to demolition of the building, or any other activities that would disturb the asbestos containing materials.

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

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

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

Regulatory Requirements

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

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

Friable NESHAP Regulated Asbestos Containing Materials (RACM) was identified during this survey however, the quantity identified is less than the threshold quantity that triggers the NESHAP notification requirement for asbestos abatement. **A NESHAP notification for "abatement" will "not" be required.**

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

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

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

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

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

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

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

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

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

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

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

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

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

Project ACM & ACCM

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

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

ACM Vinyl Floor Tile: Any abatement or disturbance of the ACM vinyl floor tile identified in this report must be done by a licensed asbestos abatement contractor. Class II asbestos abatement

methods are required for abatement by "hand" methods, with disposal as "non-friable" asbestos waste.

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

ACM Window Putty: Any abatement or disturbance of the ACM window putty identified in this report must be done by a licensed asbestos abatement contractor using Class II methods, with disposal as "non-friable" asbestos waste.

ACM Tar Roof Patch: Any abatement or disturbance of the ACM tar roof patch identified in this report must be done by a licensed asbestos abatement contractor using Class II methods, with disposal as "non-friable" asbestos waste.

PACM Electrical Panel Heat Shields/Mounting Blocks: The heat shields and interior mounting boards commonly found behind fuses and breaker switches in electrical panels/boxes often contain asbestos, and are presumed to contain asbestos. Any abatement or disturbance of the PACM materials must be done by a licensed asbestos abatement contractor using Class II methods, with disposal as "non-friable" asbestos waste.

5.0 PAINT SAMPLING/LEAD ANALYSIS

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

XRF Paint Sampling

Sampling for lead in paint was conducted using a portable Heuresis Corporation, Pb200i XRF (X-ray fluorescence) Lead Paint Analyzer, which was used to measure lead content in paint coatings of forty-five (45) building components.

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

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

- *Lead Based Paint (LBP)* is defined as paint with a lead content at or above 1.0 mg/cm^2.
- *Lead Containing Surface Coatings (LCSC)* are paints with significant quantifiable lead content less than 1.0 mg/cm^2.
- *Trace Lead Content or Lead Free (TR/LF)* are paints with trace to negative lead content.

All sampled components were found to be lead free, or to have trace unquantifiable lead content. See Table 3, Appendix B for all sampling data.

6.0 CONCLUSIONS & REGULATORY REQUIREMENTS FOR LEAD

Lead In Paint

All sampled components were found to be lead free, or to have trace unquantifiable lead content. Demolition of the building can be conducted without lead related restrictions.

7.0 ASBESTOS REGULATIONS

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

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

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

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

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

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

EPA NESHAP

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

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

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

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

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

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

Cal/OSHA

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

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

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

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

DTSC

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

A hazardous waste generator "Temporary State Hazardous Waste Id Number" must be obtained from the DTSC when friable ACM waste is generated at a site, all friable asbestos waste must be transported as hazardous waste by a licensed hazardous waste hauler, and all friable asbestos waste

must be disposed of as hazardous waste, at an approved Class I waste facility. The Temporary State Id number can be obtained on the DTSC website at:

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

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

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

8.0 LEAD REGULATIONS

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

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

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

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

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

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

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

HUD "Guidelines for the Evaluation and Control of Lead-Based Paint Hazards in Housing," second edition, 2012: is comprehensive document developed by HUD to help contractors, property owners, and other organizations identify lead-based paint, lead hazards, and control lead

hazards, in an effort to reduce childhood exposure to lead. This guideline is not a regulation however, it is directly incorporated into some lead regulations.

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

Cal/OSHA Compliance Measures for Lead Related Construction Work

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

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

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

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

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

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

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

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

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

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

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

Lead Containing Waste

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

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

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

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

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

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

Painted Metal Recycling

Painted metal components may be properly disposed of through a licensed recycling facility, regardless of lead content. In that case painted metal components need not be, and were not,

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

9.0 DISCLAIMER

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

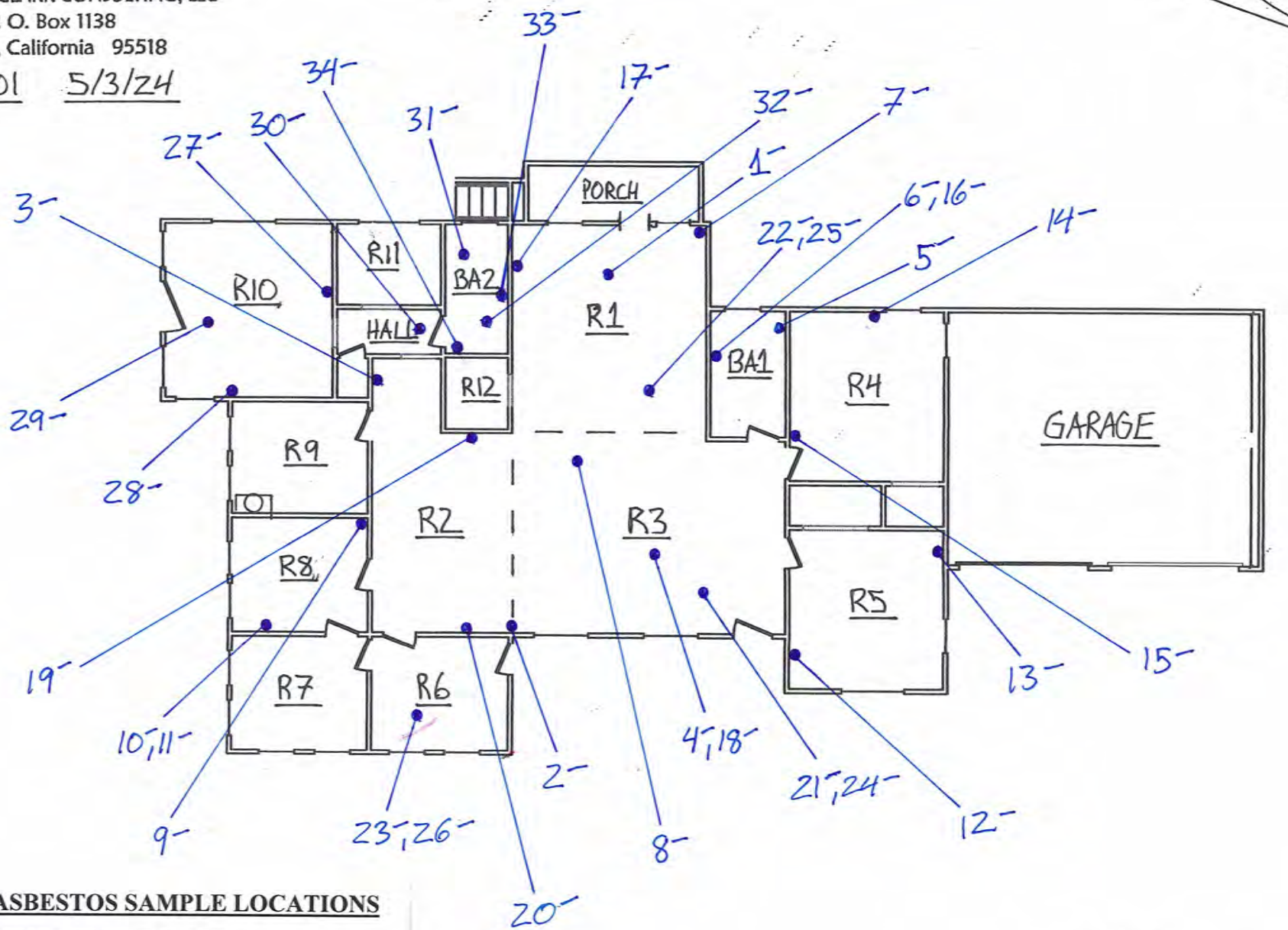
While the owner/operator was responsible for describing the extent and limits of site work, materials to be sampled were determined by the certified (asbestos) building inspector who performed this survey and was not otherwise subject to limitations by the owner/operator.

-end of text-

APPENDIX A
Figures

BRUNELLE & CLARK CONSULTING, LLC
P. O. Box 1138
Arcata, California 95518

2403401 5/3/24



ASBESTOS SAMPLE LOCATIONS

(Asbestos Samples: 1-34)

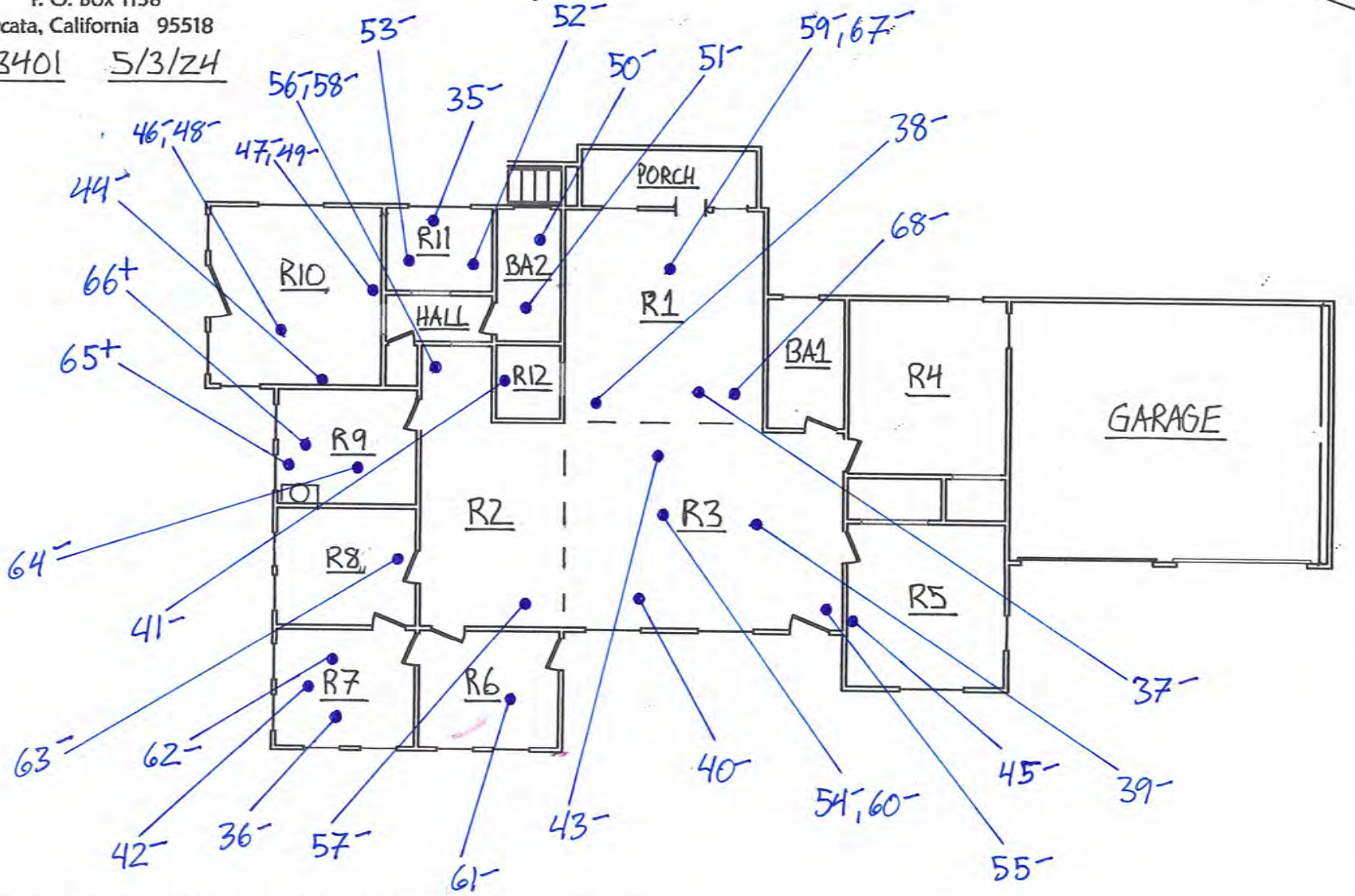
● # Asbestos Sample Locations
(Prefixed 406- #, with + or − designation)
(+) is positive for Asbestos, (−) is negative

Interior
40600 Hwy 299
Willow Creek, CA

FIG. 1

BRUNELLE & CLARK CONSULTING, LLC
P. O. Box 1138
Arcata, California 95518

2403401 5/3/24



ASBESTOS SAMPLE LOCATIONS

(Asbestos Samples: 35-68)

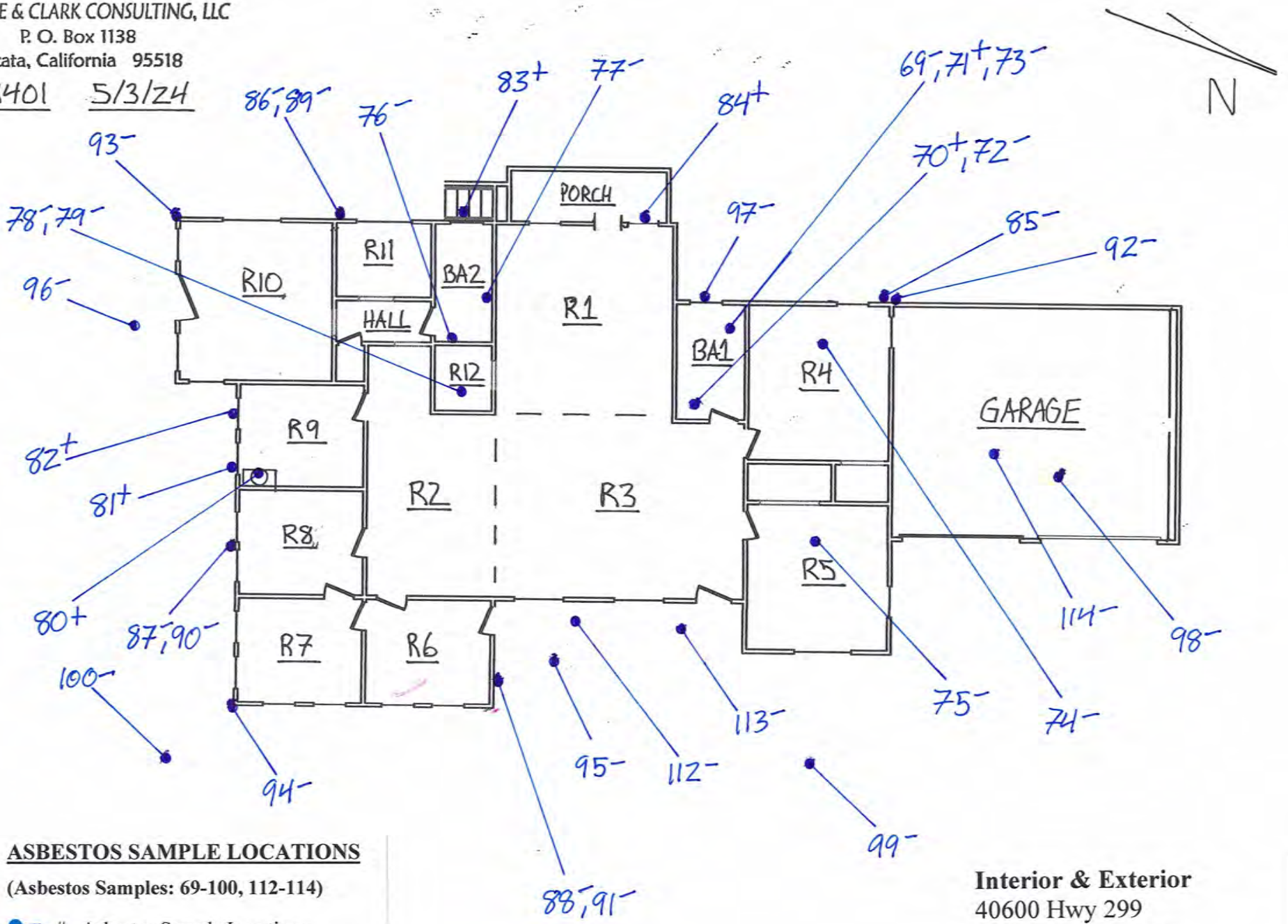
● # Asbestos Sample Locations
(Prefixed 406- #, with + or − designation)
(+) is positive for Asbestos, (−) is negative

Interior
40600 Hwy 299
Willow Creek, CA

FIG. 2

BRUNELLE & CLARK CONSULTING, LLC
P. O. Box 1138
Arcata, California 95518

2403401 5/3/24



ASBESTOS SAMPLE LOCATIONS

(Asbestos Samples: 69-100, 112-114)

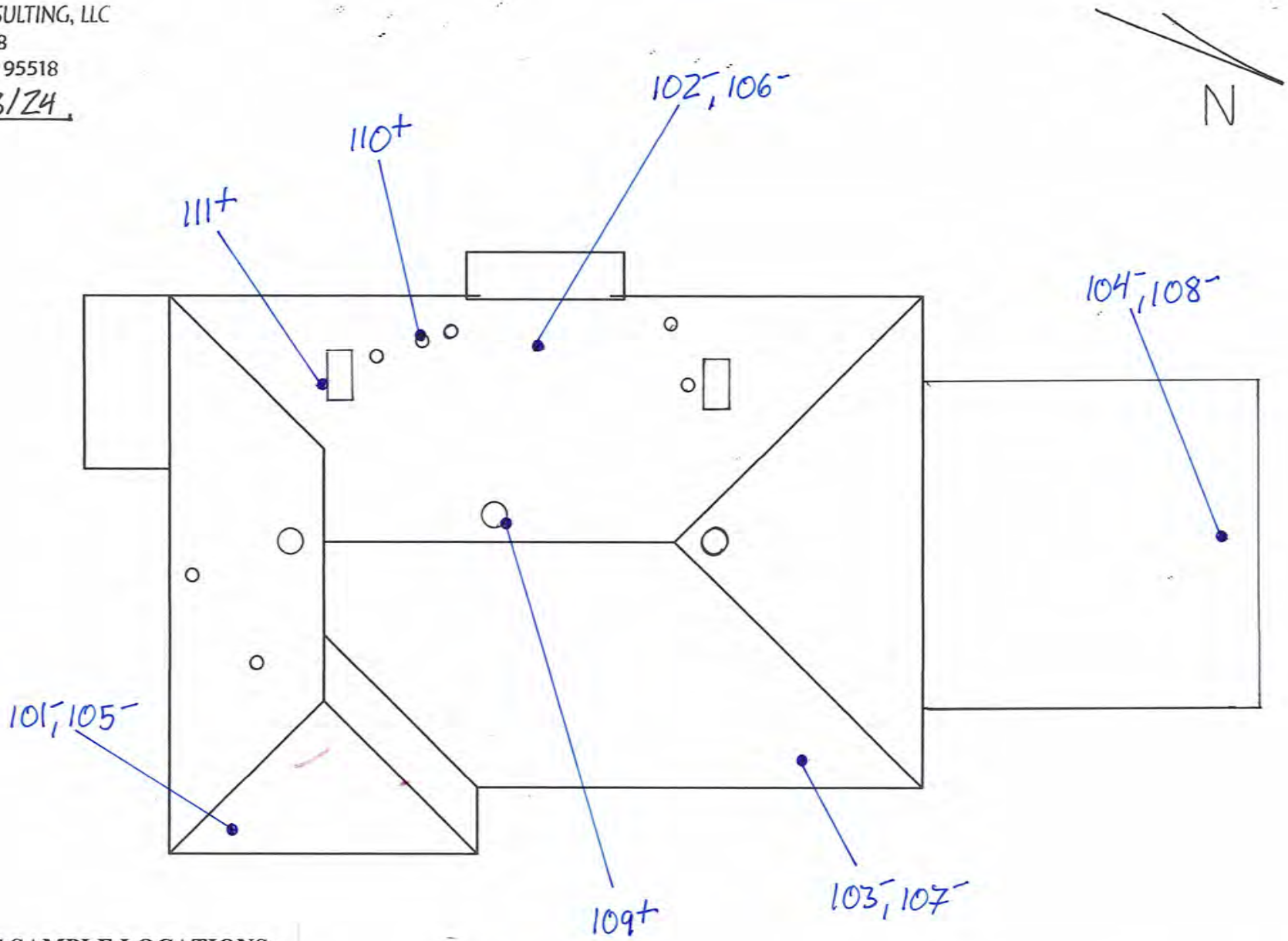
● # Asbestos Sample Locations
(Prefixed 406- #, with + or − designation)
(+) is positive for Asbestos, (−) is negative

Interior & Exterior
40600 Hwy 299
Willow Creek, CA

FIG. 3

BRUNELLE & CLARK CONSULTING, LLC
P. O. Box 1138
Arcata, California 95518

Z403401 5/3/24



ASBESTOS SAMPLE LOCATIONS

(Asbestos Samples: 101-111)

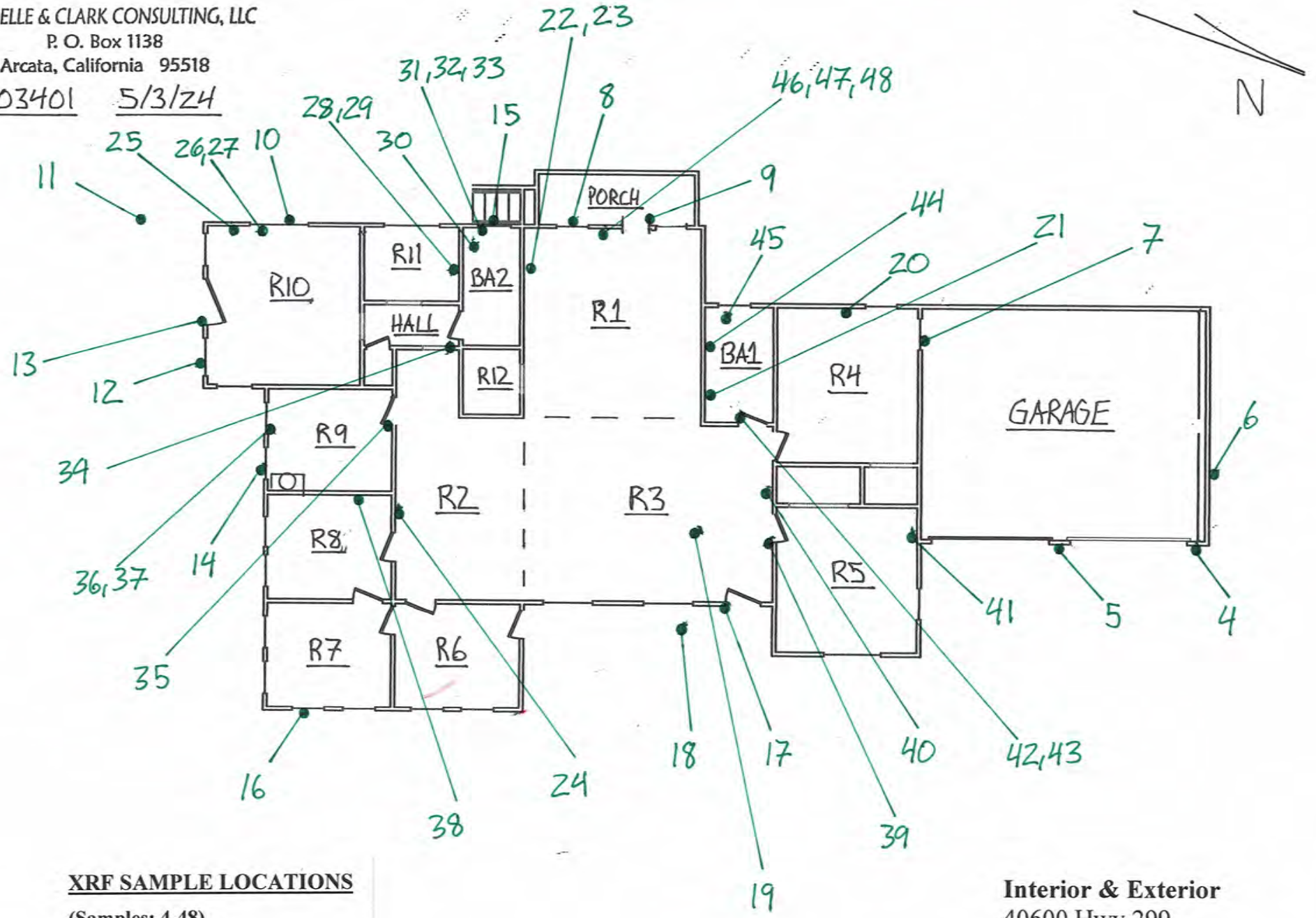
● # Asbestos Sample Locations
(Prefixed 406- #, with + or – designation)
(+) is positive for Asbestos, (–) is negative

Roof
40600 Hwy 299
Willow Creek, CA

FIG. 4

BRUNELLE & CLARK CONSULTING, LLC
P. O. Box 1138
Arcata, California 95518

2403401 5/3/24



XRF SAMPLE LOCATIONS

(Samples: 4-48)

\# XRF Sample Location

Interior & Exterior
40600 Hwy 299
Willow Creek, CA

FIG. 5

BRUNELLE & CLARK CONSULTING, LLC
P. O. Box 1138
Arcata, California 95518

2403401 5/3/24

N

ASBESTOS LOCATIONS

- ACM Vinyl floor tile (VFT), tan with brown splotches (mastic negative)
- RACM Sheet flooring, tan mosaic (under top layer of sheet flooring and plywood)
- ACM Sink pan undercoat, black
- ACM Window putty, red, gray & white (all window putty)
- Electrical panels with potential PACM heat shields & mounting blocks

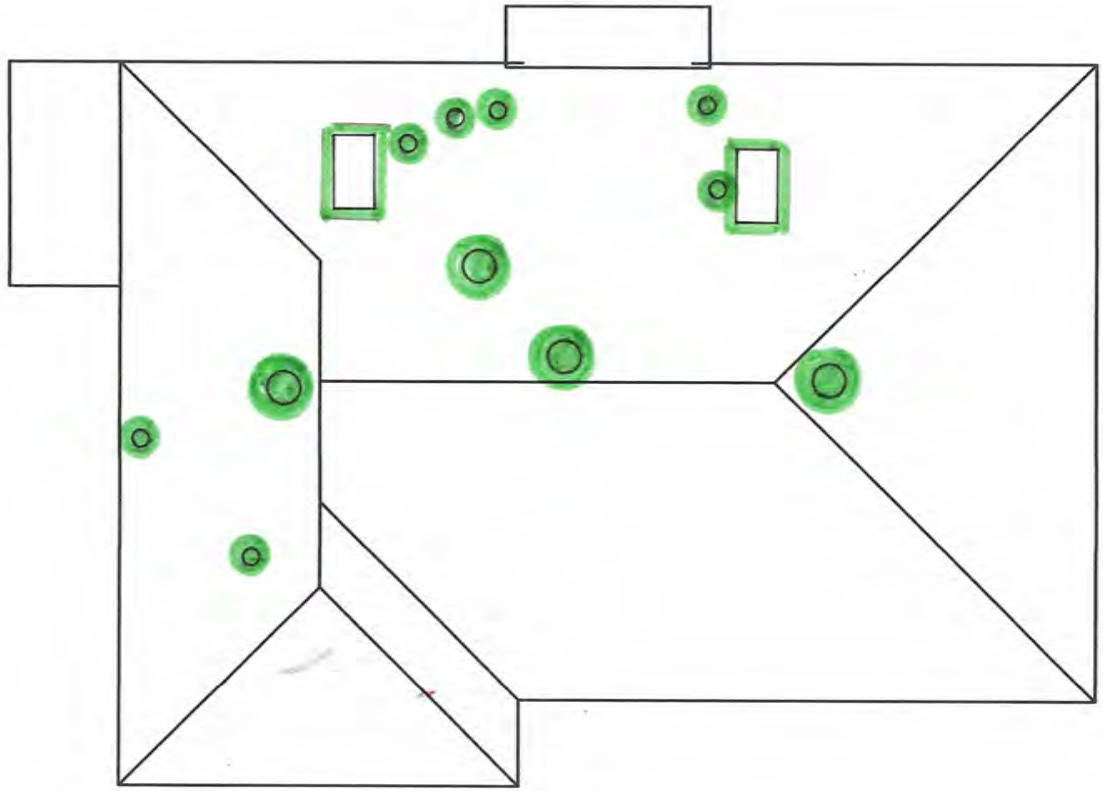
Note: see Table 2 for material & location details

Interior & Exterior
40600 Hwy 299
Willow Creek, CA

FIG. 6

BRUNELLE & CLARK CONSULTING, LLC
P. O. Box 1138
Arcata, California 95518
Z403401 5/3/24

N



ASBESTOS LOCATIONS

ACM Tar roof patch, gray (all tar roof patch)

Note: see Table 2 for material & location details

Roof
40600 Hwy 299
Willow Creek, CA

FIG. 7

APPENDIX B
Tables

TABLE 1
SUMMARY OF ASBESTOS ANALYTIC DATA

40600 Hwy 299
Willow Creek, CA

Sample Number	Sample Description (each layer)	Location	Asbestos % and Type	Friable vs. Non-Friable	Comments
406- 1	Joint compound	R1, ceiling	NAD	NF	
2nd layer	…. gypsum board	‘’	NAD	NF	
406- 2	Joint compound	R2, wall	NAD	NF	
2nd layer	…. gypsum board	‘’	NAD	NF	
406- 3	Joint compound	R2, wall	NAD	NF	
2nd layer	…. gypsum board	‘’	NAD	NF	
406- 4	Joint compound	R3, ceiling	NAD	NF	
2nd layer	…. gypsum board	‘’	NAD	NF	
406- 5	Joint compound	BA1, wall	NAD	NF	
2nd layer	…. gypsum board	‘’	NAD	NF	
406- 6	Joint compound	BA1, ceiling	NAD	NF	
2nd layer	…. gypsum board	‘’	NAD	NF	
406- 7	Joint compound	R1, wall	NAD	NF	
2nd layer	…. gypsum board	‘’	NAD	NF	
406- 8	Joint compound	R2, ceiling	NAD	NF	
2nd layer	…. gypsum board	‘’	NAD	NF	
406- 9	Joint compound	R8, wall	NAD	NF	
2nd layer	…. gypsum board	‘’	NAD	NF	
406- 10	Joint compound only	R8, wall	NAD	NF	
406- 11	Gypsum board only	R8, wall	NAD	NF	
406- 12	Drywall texture, swirl	R5, on plywood wall panel	NAD	NF	
406- 13	Drywall texture, swirl	R5, on plywood wall panel	NAD	NF	
406- 14	Drywall texture, swirl	R4, on plywood wall panel	NAD	NF	
406- 15	Drywall texture, swirl	R4, on plywood wall panel	NAD	NF	
406- 16	Drywall texture, swirl	BA1, wall	NAD	NF	
406- 17	Drywall texture, swirl	R1, wall	NAD	NF	
406- 18	Drywall texture, swirl	R3, ceiling	NAD	NF	

TABLE 1
SUMMARY OF ASBESTOS ANALYTIC DATA

40600 Hwy 299
Willow Creek, CA

Sample Number	Sample Description (each layer)	Location	Asbestos % and Type	Friable vs. Non-Friable	Comments
406- 19	Drywall texture, swirl	R2, wall	NAD	NF	
406- 20	Drywall texture, swirl	R2, wall	NAD	NF	
406- 21	Blown-in insulation, brown	Attic	NAD	NF	
406- 22	Blown-in insulation, brown	Attic	NAD	NF	
406- 23	Blown-in insulation, brown	Attic	NAD	NF	
406- 24	Blown-in insulation, yellow	Attic	NAD	NF	
406- 25	Blown-in insulation, yellow	Attic	NAD	NF	
406- 26	Blown-in insulation, yellow	Attic	NAD	NF	
406- 27	Gypsum board only	R10, wall behind plywood panels	NAD	NF	
406- 28	Gypsum board only	R10, wall behind plywood panels	NAD	NF	
406- 29	Ceiling tile, orange peel texture pattern	R10, ceiling	NAD	NF	
406- 30	Ceiling tile, orange peel texture pattern	Hall, ceiling	NAD	NF	
406- 31	Ceiling panel, brown fiberboard	BA2, ceiling	NAD	NF	
406- 32	Ceiling panel, brown fiberboard	BA2, ceiling	NAD	NF	
406- 33	Joint compound	BA2, wall	NAD	NF	
2nd layer	…. gypsum board	‘’	NAD	NF	
406- 34	Joint compound	BA2, wall	NAD	NF	
2nd layer	…. gypsum board	‘’	NAD	NF	
406- 35	Joint compound	R11, ceiling	NAD	NF	

TABLE 1
SUMMARY OF ASBESTOS ANALYTIC DATA

40600 Hwy 299
Willow Creek, CA

Sample Number	Sample Description (each layer)	Location	Asbestos % and Type	Friable vs. Non-Friable	Comments
2nd layer	…. gypsum board	‘’	NAD	NF	
406- 36	Ceiling tile, orange peel texture pattern	R7, ceiling	NAD	NF	
406- 37	Ceiling tile, knockdown texture pattern	R1, ceiling above drywall	NAD	NF	
406- 38	Ceiling tile, knockdown texture pattern	R1, ceiling above drywall	NAD	NF	
406- 39	Ceiling tile, smooth	R3, ceiling above drywall	NAD	NF	
406- 40	Ceiling tile, smooth	R3, ceiling above drywall	NAD	NF	
406- 41	Ceiling panel, brown fiberboard	R12, ceiling	NAD	NF	
406- 42	Electrical wire insulation, black & brown	R7, electrical wire	NAD	NF	
406- 43	Electrical wire insulation, black & brown	R3, electrical wire	NAD	NF	
406- 44	Heater core, cementitious, brown	R10, wall heater	NAD	NF	
406- 45	Heater core, cementitious, brown	R5, wall heater	NAD	NF	
406- 46	Sheet flooring, cream squares with black diamonds	R10, floor, top layer	NAD	NF	
406- 47	Sheet flooring, cream squares with black diamonds	R10, floor, top layer	NAD	NF	
406- 48	Vinyl floor tile (VFT), 9”x9”, tan with multi-color marble pattern	R10, floor, bottom layer	NAD	NF	

TABLE 1
SUMMARY OF ASBESTOS ANALYTIC DATA

40600 Hwy 299
Willow Creek, CA

Sample Number	Sample Description (each layer)	Location	Asbestos % and Type	Friable vs. Non-Friable	Comments
2nd layer	Felt back, black	‘’	NAD	NF	
406- 49	Vinyl floor tile (VFT), 9”x9”, tan with multi-color marble pattern	R10, floor, bottom layer	NAD	NF	
2nd layer	Felt back, black	‘’	NAD	NF	
406- 50	Sheet flooring, blue	BA2, floor, bottom layer	NAD	NF	
2nd layer	Felt back, black	‘’	NAD	NF	
406- 51	Sheet flooring, blue	BA2, floor, bottom layer	NAD	NF	
2nd layer	Felt back, black	‘’	NAD	NF	
406- 52	Vinyl floor tile (VFT), 9”x9”, tan with multi-color marble pattern	R11, floor, bottom layer	NAD	NF	
2nd layer	Felt back, black	‘’	NAD	NF	
406- 53	Vinyl floor tile (VFT), 9”x9”, tan with multi-color marble pattern	R11, floor, bottom layer	NAD	NF	
2nd layer	Felt back, black	‘’	NAD	NF	
406- 54	Sheet flooring, cream	R3, floor, top layer	NAD	NF	
406- 55	Sheet flooring, cream	R3, floor, top layer	NAD	NF	
406- 56	Sheet flooring, cream	R2, floor, top layer	NAD	NF	
406- 57	Vinyl floor tile (VFT), tan with multi-color marble pattern	R2, floor, bottom layer	NAD	NF	
406- 58	Vinyl floor tile (VFT), tan with multi-color marble pattern	R2, floor, bottom layer	NAD	NF	
406- 59	Tarpaper, black	R1, floor, bottom layer	NAD	NF	
406- 60	Tarpaper, black	R3, floor, bottom layer	NAD	NF	

TABLE 1
SUMMARY OF ASBESTOS ANALYTIC DATA

40600 Hwy 299
Willow Creek, CA

Sample Number	Sample Description (each layer)	Location	Asbestos % and Type	Friable vs. Non-Friable	Comments
406- 61	Vinyl floor tile (VFT), 9”x9”, tan with multi-color marble pattern	R6, floor, under carpet	NAD	NF	
2nd layer	Felt back, black	‘’	NAD	NF	
406- 62	Vinyl floor tile (VFT), 9”x9”, tan with multi-color marble pattern	R7, floor, under carpet	NAD	NF	
2nd layer	Felt back, black	‘’	NAD	NF	
406- 63	Vinyl floor tile (VFT), 9”x9”, tan with multi-color marble pattern	R8, floor, under carpet	NAD	NF	
2nd layer	Felt back, black	‘’	NAD	NF	
406- 64	Vinyl floor tile (VFT), 9”x9”, tan with multi-color marble pattern	R9, floor, under carpet	NAD	NF	
2nd layer	Felt back, black	‘’	NAD	NF	
406- 65	**Vinyl floor tile (VFT), tan with brown splotches**	**R9, floor, under carpet**	**2% CH**	**NF**	
2nd layer	Mastic, tan	‘’	NAD	NF	
406- 66	**Vinyl floor tile (VFT), tan with brown splotches**	**R9, floor, under carpet**	**PACM**	**NF**	**NA/PS**
2nd layer	Mastic, tan	‘’	NAD	NF	
406- 67	Sheet flooring, tan	R1, floor, only layer	NAD	NF	
406- 68	Sheet flooring, tan	R1, floor, only layer	NAD	NF	
406- 69	Sheet flooring, tan	BA1, floor, top layer	NAD	NF	
406- 70	**Sheet flooring, tan mosaic**	**BA1, floor, 2nd layer down**	**20% CH**	**F**	

TABLE 1
SUMMARY OF ASBESTOS ANALYTIC DATA

40600 Hwy 299
Willow Creek, CA

Sample Number	Sample Description (each layer)	Location	Asbestos % and Type	Friable vs. Non-Friable	Comments
406- 71	**Sheet flooring, tan mosaic**	**BA1, floor, 2nd layer down**	**PACM**	**F**	**NA/PS**
406- 72	Sheet flooring, brown	BA1, floor, bottom layer	NAD	NF	
2nd layer	Felt back, green	‘’	NAD	NF	
406- 73	Sheet flooring, brown	BA1, floor, bottom layer	NAD	NF	
2nd layer	Felt back, green	‘’	NAD	NF	
406- 74	Tarpaper, black	R4, on sub-floor	NAD	NF	
406- 75	Tarpaper, black	R5, on sub-floor	NAD	NF	
406- 76	Sheet flooring, yellow & black	BA2, wall behind drywall	NAD	NF	
406- 77	Sheet flooring, yellow & black	BA2, wall behind drywall	NAD	NF	
406- 78	Sheet flooring, tan	R12, floor, top layer	NAD	NF	
406- 79	Sheet flooring, blue	R12, floor, bottom layer	NAD	NF	
406- 80	**Sink pan undercoat, black**	**R9, underside of metal sink pan**	**2% CH**	**NF**	
406- 81	**Window putty, red**	**Exterior, window**	**<1% CH**	**NF**	
400 Point Count	***On red window putty sample above***	***“”***	***0.5% CH***	***NF***	***By 400 Point Count analysis***
406- 82	**Window putty, red**	**Exterior, window**	**<1% CH**	**NF**	
406- 83	**Window putty, gray**	**Exterior, window**	**<1% CH**	**NF**	
400 Point Count	***On gray window putty sample above***	***“”***	***1.3% CH***	***NF***	***By 400 Point Count analysis***
406- 84	**Window putty, white**	**Exterior, window**	**2% CH**	**NF**	
400 Point Count	***On white window putty sample above***	***“”***	***1.9% CH***	***NF***	***By 400 Point Count analysis***
406- 85	Siding, gray composition	Exterior, siding	NAD	NF	
2nd layer	…Fiberboard, brown	‘’	NAD	NF	

TABLE 1
SUMMARY OF ASBESTOS ANALYTIC DATA

40600 Hwy 299
Willow Creek, CA

Sample Number	Sample Description (each layer)	Location	Asbestos % and Type	Friable vs. Non-Friable	Comments
3rd layer	…Tarpaper, black	‘’	NAD	NF	
406- 86	Siding, gray composition	Exterior, siding	NAD	NF	
2nd layer	…Fiberboard, brown	‘’	NAD	NF	
3rd layer	…Tarpaper, black	‘’	NAD	NF	
406- 87	Siding, gray composition	Exterior, siding	NAD	NF	
2nd layer	…Fiberboard, brown	‘’	NAD	NF	
3rd layer	…Tarpaper, black	‘’	NAD	NF	
406- 88	Siding, gray composition	Exterior, siding	NAD	NF	
2nd layer	…Fiberboard, brown	‘’	NAD	NF	
3rd layer	…Tarpaper, black	‘’	NAD	NF	
406- 89	Tarpaper, black	Exterior, siding	NAD	NF	
406- 90	Tarpaper, black	Exterior, siding	NAD	NF	
406- 91	Tarpaper, black	Exterior, siding	NAD	NF	
406- 92	Concrete, gray	Exterior, foundation wall	NAD	NF	
406- 93	Concrete, gray	Exterior, foundation wall	NAD	NF	
406- 94	Concrete, gray	Exterior, foundation wall	NAD	NF	
406- 95	Concrete, gray	Exterior, front step	NAD	NF	
406- 96	Concrete, gray	Exterior, side ramp	NAD	NF	
406- 97	Composite board, gray	Exterior, window cover	NAD	NF	
406- 98	Asphalt, black	Exterior, garage	NAD	NF	
406- 99	Asphalt, black	Exterior, parking lot	NAD	NF	
406- 100	Asphalt, black	Exterior, parking lot	NAD	NF	
406- 101	Roofing, brown comp. shingle	Roof, main membrane	NAD	NF	
406- 102	Roofing, brown comp. shingle	Roof, main membrane	NAD	NF	
406- 103	Roofing, brown comp. shingle	Roof, main membrane	NAD	NF	

TABLE 1
SUMMARY OF ASBESTOS ANALYTIC DATA

40600 Hwy 299
Willow Creek, CA

Sample Number	Sample Description (each layer)	Location	Asbestos % and Type	Friable vs. Non-Friable	Comments
406- 104	Roofing, brown comp. shingle	Roof, main membrane	NAD	NF	
406- 105	Tarpaper, black	Roof, main membrane	NAD	NF	
406- 106	Tarpaper, black	Roof, main membrane	NAD	NF	
406- 107	Tarpaper, black	Roof, main membrane	NAD	NF	
406- 108	Tarpaper, black	Roof, main membrane	NAD	NF	
406- 109	**Tar roof patch, gray**	**Roof, exhaust vent**	**5% CH**	**NF**	
406- 110	**Tar roof patch, gray**	**Roof, septic vent**	**PACM**	**NF**	**NA/PS**
406- 111	**Tar roof patch, gray**	**Roof, HVAC unit**	**PACM**	**NF**	**NA/PS**
406- 112	Joint compound	Exterior, front porch ceiling	NAD	NF	
2nd layer	…. gypsum board	‘’	NAD	NF	
406- 113	Drywall texture, swirl	Exterior, front porch ceiling	NAD	NF	
406- 114	Cardboard, brown	Garage, roll in rafters	NAD	NF	

Bold Type = materials found to contain asbestos

CH = Chrysotile Asbestos

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

NAD = No Asbestos Detected

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

NF = Non-friable

PACM = Presumed ACM

<1% = less than 1% asbestos content

Note: Some samples had multiple layers analyzed separately

TABLE 3
XRF PAINT SAMPLING DATA

40600 Hwy 299
Willow Creek, CA

XRF Lead Paint Analyzer:

Heuresis Corp.
Model: Pb200i
Serial# 1566

Calibration:

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

Reading #	Sample Location	Component Description	Lead Concentration (mg/cm$^{2)}$	Paint Classification	Surface Coating Material	Color	Substrate
1	Calibration	Standard Reference Material	1.0	--	--	--	--
2	Calibration	Standard Reference Material	0.9	--	--	--	--
3	Calibration	Standard Reference Material	0.9	--	--	--	--
4	Exterior, garage	Siding	-0.1	TR/LF	Paint	Gray	Plywood
5	Exterior, garage	Siding trim	-0.1	TR/LF	Paint	Gray	Wood
6	Exterior, garage	Siding	0.1	TR/LF	Paint	Red	Wood
7	Exterior	Window sill	0.1	TR/LF	Paint	White	Wood

LBP = Lead Based Paint (lead content ≥1.0 mg/cm^2)
LCSC = Lead Containing Surface Coating (significant quantifiable lead content less than 1.0 mg/cm^2)
TR/LF = Trace Lead Content Or Lead Free (trace to negative lead content)

TABLE 3
XRF PAINT SAMPLING DATA

40600 Hwy 299
Willow Creek, CA

Reading #	Sample Location	Component Description	Lead Concentration ($mg/cm^{2)}$	Paint Classification	Surface Coating Material	Color	Substrate
8	Exterior	Window sill	0.1	TR/LF	Paint	White	Wood
9	Exterior	Door trim	0.1	TR/LF	Paint	White	Wood
10	Exterior	Window trim	0.1	TR/LF	Paint	White	Wood
11	Exterior, south porch	Post	0.1	TR/LF	Paint	Green	Wood
12	Exterior	Window sill	0.4	TR/LF	Paint	White	Wood
13	Exterior	Door trim	0.1	TR/LF	Paint	White	Wood
14	Exterior	Window frame	0.1	TR/LF	Paint	White	Wood
15	Exterior	Window frame	-0.1	TR/LF	Paint	White	Wood
16	Exterior	Window sill	0.1	TR/LF	Paint	White	Wood
17	Exterior	Door trim	-0.2	TR/LF	Paint	White	Wood
18	Exterior, east porch	Ceiling	0	TR/LF	Paint	White	Drywall
19	R3	Ceiling	0	TR/LF	Paint	White	Drywall
20	R4	Wall	0.1	TR/LF	Paint	White	Drywall
21	BA1	Wall	0	TR/LF	Paint	White	Drywall
22	R1	Wall	0	TR/LF	Paint	White	Drywall

LBP = Lead Based Paint (lead content ≥1.0 mg/cm^2)
LCSC = Lead Containing Surface Coating (significant quantifiable lead content less than 1.0 mg/cm^2)
TR/LF = Trace Lead Content Or Lead Free (trace to negative lead content)

TABLE 3
XRF PAINT SAMPLING DATA

40600 Hwy 299
Willow Creek, CA

Reading #	Sample Location	Component Description	Lead Concentration ($mg/cm^{2)}$	Paint Classification	Surface Coating Material	Color	Substrate
23	R1	Wall panel behind drywall	0.2	TR/LF	Paint	White	Plywood
24	R2	Wall	0.1	TR/LF	Paint	White	Drywall
25	R10	Wall panel	-0.1	TR/LF	Paint	White	Plywood
26	R10	Window trim	0	TR/LF	Paint	Purple	Wood
27	R10	Baseboard	0.1	TR/LF	Paint	Purple	Wood
28	R11	Cast iron sink	0.2	TR/LF	Glaze	White	Cast iron
29	R11	Cabinet	0.1	TR/LF	Paint	White	Wood
30	BA2	Toilet	-0.3	TR/LF	Glaze	White	Ceramic
31	BA2	Window frame	0	TR/LF	Paint	Purple	Wood
32	BA2	Window trim	0	TR/LF	Paint	Purple	Wood
33	BA2	Wall	0.1	TR/LF	Paint	Purple	Drywall
34	Hall	Door jamb	-0.1	TR/LF	Paint	White	Wood
35	R9	Door jamb	0.1	TR/LF	Paint	Yellow	Wood
36	R9	Window trim	0	TR/LF	Paint	Yellow	Wood
37	R9	Window frame	0	TR/LF	Paint	Yellow	Wood

LBP = Lead Based Paint (lead content ≥1.0 mg/cm^2)
LCSC = Lead Containing Surface Coating (significant quantifiable lead content less than 1.0 mg/cm^2)
TR/LF = Trace Lead Content Or Lead Free (trace to negative lead content)

TABLE 3
XRF PAINT SAMPLING DATA

40600 Hwy 299
Willow Creek, CA

Reading #	Sample Location	Component Description	Lead Concentration ($mg/cm^{2)}$	Paint Classification	Surface Coating Material	Color	Substrate
38	R8	Wall panel	0.1	TR/LF	Paint	White	Plywood
39	R3	Door trim	-0.1	TR/LF	Paint	White	Wood
40	R3	Cabinet	0	TR/LF	Paint	White	Wood
41	R5	Wall	0	TR/LF	Paint	White	Plywood
42	BA1	Door jamb	-0.1	TR/LF	Paint	White	Wood
43	BA1	Door trim	0.2	TR/LF	Paint	White	Wood
44	BA1	Sink	0.4	TR/LF	Glaze	White	Ceramic
45	BA1	Toilet	-0.2	TR/LF	Glaze	White	Ceramic
46	R1	Cabinet	0.4	TR/LF	Paint	White	Wood
47	R1	Sink	0.1	TR/LF	Glaze	White	Cast iron
48	R1	Window trim	0.4	TR/LF	Paint	White	Wood
49	Calibration	Standard Reference Material	1.0	--	--	--	--
50	Calibration	Standard Reference Material	1.0	--	--	--	--
51	Calibration	Standard Reference Material	1.0	--	--	--	--

LBP = Lead Based Paint (lead content ≥1.0 mg/cm^2)
LCSC = Lead Containing Surface Coating (significant quantifiable lead content less than 1.0 mg/cm^2)
TR/LF = Trace Lead Content Or Lead Free (trace to negative lead content)

APPENDIX C
Laboratory Reports

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

PLM Bulk Asbestos Report

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

Arcata, CA 95518

Date Received 04/01/24
Date Examined 04/05/24

AmeriSci Job # 124041036
P.O. #
Page 1 **of** 26

RE: 2403401; 40600 Hwy 299, Willow Creek, CA

Client No. / HGA	Lab No.	Asbestos Present	Total % Asbestos
406-1	124041036-01.1	***No***	NAD (by CVES) by Eric H. Ahles on 04/05/24
	Location: JC/GB; R1/Ceiling		
Analyst Description: White, Heterogeneous, Non-Fibrous, Joint Compound **Asbestos Types:** **Other Material:** Fibrous glass Trace, Non-fibrous 100%			
406-1	124041036-01.2	***No***	NAD (by CVES) by Eric H. Ahles on 04/05/24
	Location: JC/GB; R1/Ceiling		
Analyst Description: Gray, Heterogeneous, Non-Fibrous, Gypsum Board **Asbestos Types:** **Other Material:** Cellulose 1.0%, Non-fibrous 99%			
406-2	124041036-02.1	***No***	NAD (by CVES) by Eric H. Ahles on 04/05/24
	Location: JC/GB; R2/Wall		
Analyst Description: White, Heterogeneous, Non-Fibrous, Joint Compound **Asbestos Types:** **Other Material:** Fibrous glass 2.0%, Non-fibrous 98%			
406-2	124041036-02.2	***No***	NAD (by CVES) by Eric H. Ahles on 04/05/24
	Location: JC/GB; R2/Wall		
Analyst Description: White, Heterogeneous, Non-Fibrous, Gypsum Board **Asbestos Types:** **Other Material:** Cellulose 1.0%, Non-fibrous 99%			
406-3	124041036-03.1	***No***	NAD (by CVES) by Eric H. Ahles on 04/05/24
	Location: JC/GB; R2/Wall		
Analyst Description: White, Heterogeneous, Non-Fibrous, Joint Compound **Asbestos Types:** **Other Material:** Fibrous glass 2.0%, Non-fibrous 98%			

See Reporting notes on last page

PLM Bulk Asbestos Report

2403401; 40600 Hwy 299, Willow Creek, CA

Client No. / HGA	Lab No.	Asbestos Present	Total % Asbestos
406-3	124041036-03.2	***No***	NAD
Location: JC/GB; R2/Wall			(by CVES) by Eric H. Ahles on 04/05/24
Analyst Description: White, Heterogeneous, Non-Fibrous, Gypsum Board			
Asbestos Types:			
Other Material: Cellulose 1.0%, Non-fibrous 99%			
406-4	124041036-04.1	***No***	NAD
Location: JC/GB; R3/Ceiling			(by CVES) by Eric H. Ahles on 04/05/24
Analyst Description: White, Heterogeneous, Non-Fibrous, Joint Compound			
Asbestos Types:			
Other Material: Fibrous glass 2.0%, Non-fibrous 98%			
406-4	124041036-04.2	***No***	NAD
Location: JC/GB; R3/Ceiling			(by CVES) by Eric H. Ahles on 04/05/24
Analyst Description: White, Heterogeneous, Non-Fibrous, Gypsum Board			
Asbestos Types:			
Other Material: Cellulose 1.0%, Non-fibrous 99%			
406-5	124041036-05.1	***No***	NAD
Location: JC/GB; BA1/Wall			(by CVES) by Eric H. Ahles on 04/05/24
Analyst Description: White, Heterogeneous, Non-Fibrous, Joint Compound			
Asbestos Types:			
Other Material: Fibrous glass 2.0%, Non-fibrous 98%			
406-5	124041036-05.2	***No***	NAD
Location: JC/GB; BA1/Wall			(by CVES) by Eric H. Ahles on 04/05/24
Analyst Description: White, Heterogeneous, Non-Fibrous, Gypsum Board			
Asbestos Types:			
Other Material: Cellulose 1.0%, Non-fibrous 99%			
406-6	124041036-06.1	***No***	NAD
Location: JC/GB; BA1/Ceiling			(by CVES) by Eric H. Ahles on 04/05/24
Analyst Description: White, Heterogeneous, Non-Fibrous, Joint Compound			
Asbestos Types:			
Other Material: Non-fibrous 100%			

See Reporting notes on last page

PLM Bulk Asbestos Report

2403401; 40600 Hwy 299, Willow Creek, CA

Client No. / HGA	Lab No.	Asbestos Present	Total % Asbestos
406-6	124041036-06.2	***No***	NAD
Location: JC/GB; BA1/Ceiling			(by CVES) by Eric H. Ahles on 04/05/24
Analyst Description: Gray, Heterogeneous, Non-Fibrous, Gypsum Board **Asbestos Types:** **Other Material:** Cellulose 2.0%, Non-fibrous 98%			
406-7	124041036-07.1	***No***	NAD
Location: JC/GB; R1/Wall			(by CVES) by Eric H. Ahles on 04/05/24
Analyst Description: White, Heterogeneous, Non-Fibrous, Joint Compound **Asbestos Types:** **Other Material:** Fibrous glass 1.0%, Non-fibrous 99%			
406-7	124041036-07.2	***No***	NAD
Location: JC/GB; R1/Wall			(by CVES) by Eric H. Ahles on 04/05/24
Analyst Description: Gray, Heterogeneous, Non-Fibrous, Gypsum Board **Asbestos Types:** **Other Material:** Cellulose 2.0%, Non-fibrous 98%			
406-8	124041036-08.1	***No***	NAD
Location: JC/GB; R2/Ceiling			(by CVES) by Eric H. Ahles on 04/05/24
Analyst Description: White, Heterogeneous, Non-Fibrous, Joint Compound **Asbestos Types:** **Other Material:** Fibrous glass 1.0%, Non-fibrous 99%			
406-8	124041036-08.2	***No***	NAD
Location: JC/GB; R2/Ceiling			(by CVES) by Eric H. Ahles on 04/05/24
Analyst Description: Gray, Heterogeneous, Non-Fibrous, Gypsum Board **Asbestos Types:** **Other Material:** Cellulose 2.0%, Non-fibrous 98%			
406-9	124041036-09.1	***No***	NAD
Location: JC/GB; R8/Wall			(by CVES) by Eric H. Ahles on 04/05/24
Analyst Description: White, Heterogeneous, Non-Fibrous, Joint Compound **Asbestos Types:** **Other Material:** Non-fibrous 100%			

See Reporting notes on last page

PLM Bulk Asbestos Report

2403401; 40600 Hwy 299, Willow Creek, CA

Client No. / HGA	Lab No.	Asbestos Present	Total % Asbestos
406-9	124041036-09.2	***No***	NAD
	Location: JC/GB; R8/Wall		(by CVES) by Eric H. Ahles on 04/05/24
Analyst Description: Gray, Heterogeneous, Non-Fibrous, Gypsum Board **Asbestos Types:** **Other Material:** Cellulose 2.0%, Non-fibrous 98%			
406-10	124041036-10	***No***	NAD
	Location: JC Only; R8/Wall		(by CVES) by Eric H. Ahles on 04/05/24
Analyst Description: Gray, Heterogeneous, Non-Fibrous, Joint Compound **Asbestos Types:** **Other Material:** Fibrous glass 1.0%, Non-fibrous 99%			
406-11	124041036-11	***No***	NAD
	Location: GB Only; R8/Wall		(by CVES) by Eric H. Ahles on 04/05/24
Analyst Description: Gray, Heterogeneous, Non-Fibrous, Gypsum Board **Asbestos Types:** **Other Material:** Cellulose 2.0%, Non-fibrous 98%			
406-12 1	124041036-12 **Location:** Drywall Texture, Swirl; R5/On Plywood Wall Panel	***No***	NAD (by CVES) by Tou Si Anothay on 04/05/24
Analyst Description: White, Heterogeneous, Non-Fibrous, Textured Joint Compound **Asbestos Types:** **Other Material:** Non-fibrous 100%			
406-13 1	124041036-13 **Location:** Drywall Texture, Swirl; R5/On Plywood Wall Panel	***No***	NAD (by CVES) by Tou Si Anothay on 04/05/24
Analyst Description: White, Heterogeneous, Non-Fibrous, Textured Joint Compound **Asbestos Types:** **Other Material:** Non-fibrous 100%			
406-14 1	124041036-14 **Location:** Drywall Texture, Swirl; R4/On Plywood Wall Panel	***No***	NAD (by CVES) by Tou Si Anothay on 04/05/24
Analyst Description: White, Heterogeneous, Non-Fibrous, Textured Joint Compound **Asbestos Types:** **Other Material:** Non-fibrous 100%			

See Reporting notes on last page

PLM Bulk Asbestos Report

2403401; 40600 Hwy 299, Willow Creek, CA

Client No. / HGA	Lab No.	Asbestos Present	Total % Asbestos
406-15 1	124041036-15 **Location:** Drywall Texture, Swirl; R4/On Plywood Wall Panel	***No***	NAD (by CVES) by Tou Si Anothay on 04/05/24
Analyst Description: White, Heterogeneous, Non-Fibrous, Textured Joint Compound **Asbestos Types:** **Other Material:** Non-fibrous 100%			
406-16 1	124041036-16 **Location:** Drywall Texture, Swirl; BA1/Wall	***No***	NAD (by CVES) by Tou Si Anothay on 04/05/24
Analyst Description: White, Heterogeneous, Non-Fibrous, Textured Joint Compound **Asbestos Types:** **Other Material:** Non-fibrous 100%			
406-17 1	124041036-17 **Location:** Drywall Texture, Swirl; R1/Wall	***No***	NAD (by CVES) by Tou Si Anothay on 04/05/24
Analyst Description: White, Heterogeneous, Non-Fibrous, Textured Joint Compound **Asbestos Types:** **Other Material:** Non-fibrous 100%			
406-18 1	124041036-18 **Location:** Drywall Texture, Swirl; R3/Ceiling	***No***	NAD (by CVES) by Tou Si Anothay on 04/05/24
Analyst Description: White, Heterogeneous, Non-Fibrous, Textured Joint Compound **Asbestos Types:** **Other Material:** Non-fibrous 100%			
406-19 1	124041036-19 **Location:** Drywall Texture, Swirl; R2/Wall	***No***	NAD (by CVES) by Tou Si Anothay on 04/05/24
Analyst Description: White, Heterogeneous, Non-Fibrous, Textured Joint Compound **Asbestos Types:** **Other Material:** Non-fibrous 100%			
406-20 1	124041036-20 **Location:** Drywall Texture, Swirl; R2/Wall	***No***	NAD (by CVES) by Tou Si Anothay on 04/05/24
Analyst Description: White, Heterogeneous, Non-Fibrous, Textured Joint Compound **Asbestos Types:** **Other Material:** Non-fibrous 100%			

See Reporting notes on last page

PLM Bulk Asbestos Report

2403401; 40600 Hwy 299, Willow Creek, CA

Client No. / HGA	Lab No.	Asbestos Present	Total % Asbestos
406-21	124041036-21	***No***	NAD
Location: Blown In Insulation, Brown; Attic			(by CVES) by Tou Si Anothay on 04/05/24
Analyst Description: Brown, Heterogeneous, Fibrous, Insulation			
Asbestos Types:			
Other Material: Cellulose 98%, Non-fibrous 2.0%			
406-22	124041036-22	***No***	NAD
Location: Blown In Insulation, Brown; Attic			(by CVES) by Tou Si Anothay on 04/05/24
Analyst Description: Brown, Heterogeneous, Fibrous, Insulation			
Asbestos Types:			
Other Material: Cellulose 98%, Non-fibrous 2.0%			
406-23	124041036-23	***No***	NAD
Location: Blown In Insulation, Brown; Attic			(by CVES) by Tou Si Anothay on 04/05/24
Analyst Description: Brown, Heterogeneous, Fibrous, Insulation			
Asbestos Types:			
Other Material: Cellulose 98%, Non-fibrous 2.0%			
406-24	124041036-24	***No***	NAD
Location: Blown In Insulation, Yellow; Attic			(by CVES) by Tou Si Anothay on 04/05/24
Analyst Description: Yellow, Heterogeneous, Fibrous, Insulation			
Asbestos Types:			
Other Material: Fibrous glass 98%, Non-fibrous 2.0%			
406-25	124041036-25	***No***	NAD
Location: Blown In Insulation, Yellow; Attic			(by CVES) by Tou Si Anothay on 04/05/24
Analyst Description: Yellow, Heterogeneous, Fibrous, Insulation			
Asbestos Types:			
Other Material: Fibrous glass 98%, Non-fibrous 2.0%			
406-26	124041036-26	***No***	NAD
Location: Blown In Insulation, Yellow; Attic			(by CVES) by Tou Si Anothay on 04/05/24
Analyst Description: Yellow, Heterogeneous, Fibrous, Insulation			
Asbestos Types:			
Other Material: Fibrous glass 98%, Non-fibrous 2.0%			

See Reporting notes on last page

PLM Bulk Asbestos Report

2403401; 40600 Hwy 299, Willow Creek, CA

Client No. / HGA	Lab No.	Asbestos Present	Total % Asbestos
406-27	124041036-27	***No***	NAD
Location: GB Only; R10/Wall Behind Plywood Panels			(by CVES) by Tou Si Anothay on 04/05/24
Analyst Description: White, Heterogeneous, Non-Fibrous, Gypsum Board			
Asbestos Types:			
Other Material: Non-fibrous 100%			
406-28	124041036-28	***No***	NAD
Location: GB Only; R10/Wall Behind Plywood Panels			(by CVES) by Tou Si Anothay on 04/05/24
Analyst Description: White, Heterogeneous, Non-Fibrous, Gypsum Board			
Asbestos Types:			
Other Material: Non-fibrous 100%			
406-29	124041036-29	***No***	NAD
Location: CT, Orange Peel Texture Pattern (Type 1); R10/Ceiling			(by CVES) by Tou Si Anothay on 04/05/24
Analyst Description: Orange, Heterogeneous, Fibrous, Ceiling Tile			
Asbestos Types:			
Other Material: Cellulose 85%, Non-fibrous 15%			
406-30	124041036-30	***No***	NAD
Location: CT, Orange Peel Texture Pattern (Type 1); Hall/Ceiling			(by CVES) by Tou Si Anothay on 04/05/24
Analyst Description: Orange, Heterogeneous, Fibrous, Ceiling Tile			
Asbestos Types:			
Other Material: Cellulose 95%, Non-fibrous 5.0%			
406-31	124041036-31	***No***	NAD
Location: CP, Brown Fiberboard; BA2/Ceiling			(by CVES) by Tou Si Anothay on 04/05/24
Analyst Description: Brown, Heterogeneous, Fibrous, Ceiling Panel			
Asbestos Types:			
Other Material: Cellulose 95%, Non-fibrous 5.0%			
406-32	124041036-32	***No***	NAD
Location: CP, Brown Fiberboard; BA2/Ceiling			(by CVES) by Tou Si Anothay on 04/05/24
Analyst Description: Brown, Heterogeneous, Fibrous, Ceiling Panel			
Asbestos Types:			
Other Material: Cellulose 95%, Non-fibrous 5.0%			

See Reporting notes on last page

PLM Bulk Asbestos Report

2403401; 40600 Hwy 299, Willow Creek, CA

Client No. / HGA	Lab No.	Asbestos Present	Total % Asbestos
406-33	124041036-33.1	***No***	NAD
Location: JC/GB; BA2/Wall			(by CVES) by Tou Si Anothay on 04/05/24
Analyst Description: White, Heterogeneous, Non-Fibrous, Joint Compound **Asbestos Types:** **Other Material:** Non-fibrous 100%			
406-33	124041036-33.2	***No***	NAD
Location: JC/GB; BA2/Wall			(by CVES) by Tou Si Anothay on 04/05/24
Analyst Description: White, Heterogeneous, Non-Fibrous, Gypsum Board **Asbestos Types:** **Other Material:** Non-fibrous 100%			
406-34	124041036-34.1	***No***	NAD
Location: JC/GB; BA2/Wall			(by CVES) by Tou Si Anothay on 04/05/24
Analyst Description: White, Heterogeneous, Non-Fibrous, Joint Compound **Asbestos Types:** **Other Material:** Non-fibrous 100%			
406-34	124041036-34.2	***No***	NAD
Location: JC/GB; BA2/Wall			(by CVES) by Tou Si Anothay on 04/05/24
Analyst Description: White, Heterogeneous, Non-Fibrous, Gypsum Board **Asbestos Types:** **Other Material:** Non-fibrous 100%			
406-35	124041036-35.1	***No***	NAD
Location: JC/GB; R11/Ceiling			(by CVES) by Tou Si Anothay on 04/05/24
Analyst Description: White, Heterogeneous, Non-Fibrous, Joint Compound **Asbestos Types:** **Other Material:** Non-fibrous 100%			
406-35	124041036-35.2	***No***	NAD
Location: JC/GB; R11/Ceiling			(by CVES) by Tou Si Anothay on 04/05/24
Analyst Description: White, Heterogeneous, Non-Fibrous, Gypsum Board **Asbestos Types:** **Other Material:** Non-fibrous 100%			

See Reporting notes on last page

PLM Bulk Asbestos Report

2403401; 40600 Hwy 299, Willow Creek, CA

Client No. / HGA	Lab No.	Asbestos Present	Total % Asbestos
406-36	124041036-36	***No***	NAD
Location: CT, Orange Peel Texture Pattern (Type 1); R7/Ceiling			(by CVES) by Tou Si Anothay on 04/05/24
Analyst Description: Orange, Heterogeneous, Fibrous, Ceiling Tile			
Asbestos Types:			
Other Material: Cellulose 95%, Non-fibrous 5.0%			
406-37	124041036-37	***No***	NAD
Location: CT, Knockdown Texture Pattern (Type 2); R1/Ceiling/Above Drywall			(by CVES) by Tou Si Anothay on 04/05/24
Analyst Description: White/Brown, Heterogeneous, Fibrous, Ceiling Tile			
Asbestos Types:			
Other Material: Cellulose 95%, Non-fibrous 5.0%			
406-38	124041036-38	***No***	NAD
Location: CT, Knockdown Texture Pattern (Type 2); R1/Ceiling/Above Drywall			(by CVES) by Tou Si Anothay on 04/05/24
Analyst Description: White/Brown, Heterogeneous, Fibrous, Ceiling Tile			
Asbestos Types:			
Other Material: Cellulose 95%, Non-fibrous 5.0%			
406-39	124041036-39	***No***	NAD
Location: CT, Smooth (Type 3); R3/Ceiling/Above Drywall			(by CVES) by Tou Si Anothay on 04/05/24
Analyst Description: White/Brown, Heterogeneous, Fibrous, Ceiling Tile			
Asbestos Types:			
Other Material: Cellulose 95%, Non-fibrous 5.0%			
406-40	124041036-40	***No***	NAD
Location: CT, Smooth (Type 3); R3/Ceiling/Above Drywall			(by CVES) by Tou Si Anothay on 04/05/24
Analyst Description: White/Brown, Heterogeneous, Fibrous, Ceiling Tile			
Asbestos Types:			
Other Material: Cellulose 95%, Non-fibrous 5.0%			
406-41	124041036-41	***No***	NAD
Location: CP, Brown Fiberboard; R12/Ceiling			(by CVES) by Tou Si Anothay on 04/05/24
Analyst Description: Brown, Heterogeneous, Fibrous, Ceiling Panel			
Asbestos Types:			
Other Material: Cellulose 95%, Non-fibrous 5.0%			

See Reporting notes on last page

PLM Bulk Asbestos Report

2403401; 40600 Hwy 299, Willow Creek, CA

Client No. / HGA	Lab No.	Asbestos Present	Total % Asbestos
406-42	124041036-42	***No***	NAD
	Location: Electrical Wire Insulation, Black & Brown; R7/Electrical Wire		(by CVES) by Tou Si Anothay on 04/05/24
Analyst Description: Black/Brown, Heterogeneous, Fibrous, Insulation			
Asbestos Types:			
Other Material: Cellulose 65%, Fibrous glass 25%, Non-fibrous 10%			
406-43	124041036-43	***No***	NAD
	Location: Electrical Wire Insulation, Black & Brown; R3/Electrical Wire		(by CVES) by Tou Si Anothay on 04/05/24
Analyst Description: Black/Brown, Heterogeneous, Fibrous, Insulation			
Asbestos Types:			
Other Material: Cellulose 85%, Non-fibrous 15%			
406-44	124041036-44	***No***	NAD
	Location: Heater Core, Brown Cementitious; R10/Wall Heater		(by CVES) by Tou Si Anothay on 04/05/24
Analyst Description: Brown, Heterogeneous, Non-Fibrous, Cementitious, Heater Core			
Asbestos Types:			
Other Material: Non-fibrous 100%			
406-45	124041036-45	***No***	NAD
	Location: Heater Core, Brown Cementitious; R5/Wall Heater		(by CVES) by Tou Si Anothay on 04/05/24
Analyst Description: Brown, Heterogeneous, Non-Fibrous, Cementitious, Heater Core			
Asbestos Types:			
Other Material: Non-fibrous 100%			
406-46	124041036-46	***No***	NAD
2	**Location:** SF, Cream Squares With Black Diamonds; R10/Floor/Top Layer		(by CVES) by Tou Si Anothay on 04/05/24
Analyst Description: White, Heterogeneous, Non-Fibrous, Sheet Flooring			
Asbestos Types:			
Other Material: Non-fibrous 100%			
406-47	124041036-47	***No***	NAD
2	**Location:** SF, Cream Squares With Black Diamonds; R10/Floor/Top Layer		(by CVES) by Tou Si Anothay on 04/05/24
Analyst Description: White, Heterogeneous, Non-Fibrous, Sheet Flooring			
Asbestos Types:			
Other Material: Non-fibrous 100%			

See Reporting notes on last page

PLM Bulk Asbestos Report

2403401; 40600 Hwy 299, Willow Creek, CA

Client No. / HGA	Lab No.	Asbestos Present	Total % Asbestos
406-48	124041036-48L1	***No***	NAD
3	**Location:** VFT (9x9), Tan Multi Color Marble Pattern/Black Felt Back; R10/Floor/Bottom Layer		(by CVES) by Eric H. Ahles on 04/05/24
Analyst Description: Multi-Colored, Homogeneous, Non-Fibrous, Vinyl Flooring			
Asbestos Types:			
Other Material: Cellulose 10%, Non-fibrous 90%			
406-48	124041036-48L2	***No***	NAD
3	**Location:** VFT (9x9), Tan Multi Color Marble Pattern/Black Felt Back; R10/Floor/Bottom Layer		(by CVES) by Eric H. Ahles on 04/05/24
Analyst Description: Black, Heterogeneous, Fibrous, Felt			
Asbestos Types:			
Other Material: Cellulose 60%, Non-fibrous 40%			
406-49	124041036-49L1	***No***	NAD
3	**Location:** VFT (9x9), Tan Multi Color Marble Pattern/Black Felt Back; R10/Floor/Bottom Layer		(by CVES) by Eric H. Ahles on 04/05/24
Analyst Description: Multi-Colored, Homogeneous, Non-Fibrous, Vinyl Flooring			
Asbestos Types:			
Other Material: Cellulose 10%, Non-fibrous 90%			
406-49	124041036-49L2	***No***	NAD
3	**Location:** VFT (9x9), Tan Multi Color Marble Pattern/Black Felt Back; R10/Floor/Bottom Layer		(by CVES) by Eric H. Ahles on 04/05/24
Analyst Description: Black, Heterogeneous, Fibrous, Felt			
Asbestos Types:			
Other Material: Cellulose 60%, Non-fibrous 40%			
406-50	124041036-50L1	***No***	NAD
4	**Location:** SF, Blue/Black Felt Back; BA2/Floor/Bottom Layer		(by CVES) by Eric H. Ahles on 04/05/24
Analyst Description: Blue/Black, Heterogeneous, Non-Fibrous, Sheet Flooring			
Asbestos Types:			
Other Material: Cellulose 20%, Non-fibrous 80%			
406-50	124041036-50L2	***No***	NAD
4	**Location:** SF, Blue/Black Felt Back; BA2/Floor/Bottom Layer		(by CVES) by Eric H. Ahles on 04/05/24
Analyst Description: Black, Heterogeneous, Fibrous, Felt			
Asbestos Types:			
Other Material: Cellulose 60%, Non-fibrous 40%			

See Reporting notes on last page

PLM Bulk Asbestos Report

2403401; 40600 Hwy 299, Willow Creek, CA

Client No. / HGA	Lab No.	Asbestos Present	Total % Asbestos
406-51 4	124041036-51L1 **Location:** SF, Blue/Black Felt Back; BA2/Floor/Bottom Layer	***No***	NAD (by CVES) by Eric H. Ahles on 04/05/24

Analyst Description: Blue/Black, Heterogeneous, Non-Fibrous, Sheet Flooring
Asbestos Types:
Other Material: Cellulose 20%, Non-fibrous 80%

406-51 4	124041036-51L2 **Location:** SF, Blue/Black Felt Back; BA2/Floor/Bottom Layer	***No***	NAD (by CVES) by Eric H. Ahles on 04/05/24

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

406-52 5	124041036-52L1 **Location:** VFT, Tan Multi-Color Marble Pattern/Black Felt Back; R11/Floor/Bottom Layer	***No***	NAD (by CVES) by Eric H. Ahles on 04/05/24

Analyst Description: Tan, Heterogeneous, Non-Fibrous, Vinyl Flooring
Asbestos Types:
Other Material: Cellulose 20%, Non-fibrous 80%

406-52 5	124041036-52L2 **Location:** VFT, Tan Multi-Color Marble Pattern/Black Felt Back; R11/Floor/Bottom Layer	***No***	NAD (by CVES) by Eric H. Ahles on 04/05/24

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

406-53 5	124041036-53L1 **Location:** VFT, Tan Multi-Color Marble Pattern/Black Felt Back; R11/Floor/Bottom Layer	***No***	NAD (by CVES) by Eric H. Ahles on 04/05/24

Analyst Description: Tan, Heterogeneous, Non-Fibrous, Vinyl Flooring
Asbestos Types:
Other Material: Cellulose 20%, Non-fibrous 80%

406-53 5	124041036-53L2 **Location:** VFT, Tan Multi-Color Marble Pattern/Black Felt Back; R11/Floor/Bottom Layer	***No***	NAD (by CVES) by Eric H. Ahles on 04/05/24

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

See Reporting notes on last page

PLM Bulk Asbestos Report

2403401; 40600 Hwy 299, Willow Creek, CA

Client No. / HGA	Lab No.	Asbestos Present	Total % Asbestos
406-54 6	124041036-54 **Location:** SF, Cream; R3/Floor/Top Layer	***No***	NAD (by CVES) by Eric H. Ahles on 04/05/24
Analyst Description: Cream, Heterogeneous, Fibrous, Sheet Flooring **Asbestos Types:** **Other Material:** Cellulose 40%, Non-fibrous 60%			
406-55 6	124041036-55 **Location:** SF, Cream; R3/Floor/Top Layer	***No***	NAD (by CVES) by Eric H. Ahles on 04/05/24
Analyst Description: Cream, Heterogeneous, Fibrous, Sheet Flooring **Asbestos Types:** **Other Material:** Cellulose 40%, Non-fibrous 60%			
406-56 6	124041036-56 **Location:** SF, Cream; R2/Floor/Top Layer	***No***	NAD (by CVES) by Eric H. Ahles on 04/05/24
Analyst Description: Cream, Heterogeneous, Fibrous, Sheet Flooring **Asbestos Types:** **Other Material:** Cellulose 40%, Non-fibrous 60%			
406-57 7	124041036-57 **Location:** VFT, Tan Multi-Color Marble Pattern; R2/Floor/Bottom Layer	***No***	NAD (by CVES) by Eric H. Ahles on 04/05/24
Analyst Description: Tan, Heterogeneous, Non-Fibrous, Vinyl Flooring **Asbestos Types:** **Other Material:** Cellulose 60%, Non-fibrous 40%			
406-58 7	124041036-58 **Location:** VFT, Tan Multi-Color Marble Pattern; R2/Floor/Bottom Layer	***No***	NAD (by CVES) by Eric H. Ahles on 04/05/24
Analyst Description: Tan, Heterogeneous, Non-Fibrous, Vinyl Flooring **Asbestos Types:** **Other Material:** Cellulose 40%, Non-fibrous 60%			
406-59	124041036-59 **Location:** Tar Paper, Black; R1/Floor/Bottom Layer	***No***	NAD (by CVES) by Eric H. Ahles on 04/05/24
Analyst Description: Black, Heterogeneous, Fibrous, Tar Paper **Asbestos Types:** **Other Material:** Cellulose 60%, Non-fibrous 40%			

See Reporting notes on last page

PLM Bulk Asbestos Report

2403401; 40600 Hwy 299, Willow Creek, CA

Client No. / HGA	Lab No.	Asbestos Present	Total % Asbestos
406-60	124041036-60	***No***	NAD
	Location: Tar Paper, Black; R3/Floor/Bottom Layer		(by CVES) by Eric H. Ahles on 04/04/24
Analyst Description: Black, Heterogeneous, Fibrous, Tar Paper			
Asbestos Types:			
Other Material: Cellulose 60%, Non-fibrous 40%			
406-618	124041036-61L1	***No***	NAD
	Location: VFT, Tan Multi-Color Marble Pattern/Black Felt Back; R6/Floor/Under Carpet		(by CVES) by Eric H. Ahles on 04/04/24
Analyst Description: White/Blue, Heterogeneous, Non-Fibrous, Vinyl Flooring			
Asbestos Types:			
Other Material: Cellulose 20%, Non-fibrous 80%			
406-618	124041036-61L2	***No***	NAD
	Location: VFT, Tan Multi-Color Marble Pattern/Black Felt Back; R6/Floor/Under Carpet		(by CVES) by Eric H. Ahles on 04/04/24
Analyst Description: Black, Heterogeneous, Fibrous, Felt			
Asbestos Types:			
Other Material: Cellulose 60%, Non-fibrous 40%			
406-628	124041036-62L1	***No***	NAD
	Location: VFT, Tan Multi-Color Marble Pattern/Black Felt Back; R7/Floor/Under Carpet		(by CVES) by Eric H. Ahles on 04/04/24
Analyst Description: White/Blue, Heterogeneous, Non-Fibrous, Vinyl Flooring			
Asbestos Types:			
Other Material: Cellulose 20%, Non-fibrous 80%			
406-628	124041036-62L2	***No***	NAD
	Location: VFT, Tan Multi-Color Marble Pattern/Black Felt Back; R7/Floor/Under Carpet		(by CVES) by Eric H. Ahles on 04/04/24
Analyst Description: Black, Heterogeneous, Fibrous, Felt			
Asbestos Types:			
Other Material: Cellulose 60%, Non-fibrous 40%			
406-638	124041036-63L1	***No***	NAD
	Location: VFT, Tan Multi-Color Marble Pattern/Black Felt Back; R8/Floor/Under Carpet		(by CVES) by Eric H. Ahles on 04/04/24
Analyst Description: White/Blue, Heterogeneous, Non-Fibrous, Vinyl Flooring			
Asbestos Types:			
Other Material: Cellulose 20%, Non-fibrous 80%			

See Reporting notes on last page

PLM Bulk Asbestos Report

2403401; 40600 Hwy 299, Willow Creek, CA

Client No. / HGA	Lab No.	Asbestos Present	Total % Asbestos
406-63	124041036-63L2	***No***	NAD
8	**Location:** VFT, Tan Multi-Color Marble Pattern/Black Felt Back; R8/Floor/Under Carpet		(by CVES) by Eric H. Ahles on 04/04/24
Analyst Description: Black, Heterogeneous, Fibrous, Felt **Asbestos Types:** **Other Material:** Cellulose 60%, Non-fibrous 40%			
406-64	124041036-64L1	***No***	NAD
8	**Location:** VFT, Tan Multi-Color Marble Pattern/Black Felt Back; R9/Floor/Under Carpet		(by CVES) by Eric H. Ahles on 04/04/24
Analyst Description: White/Blue, Heterogeneous, Non-Fibrous, Vinyl Flooring **Asbestos Types:** **Other Material:** Cellulose 20%, Non-fibrous 80%			
406-64	124041036-64L2	***No***	NAD
8	**Location:** VFT, Tan Multi-Color Marble Pattern/Black Felt Back; R9/Floor/Under Carpet		(by CVES) by Eric H. Ahles on 04/04/24
Analyst Description: Black, Heterogeneous, Fibrous, Felt **Asbestos Types:** **Other Material:** Cellulose 60%, Non-fibrous 40%			
406-65	124041036-65L1	***Yes***	2.0%
9	**Location:** VFT, Tan With Brown Splotches/Tan Mastic; R9/Floor/Under Carpet		(by CVES) by Eric H. Ahles on 04/04/24
Analyst Description: Tan, Heterogeneous, Non-Fibrous, Floor Tile **Asbestos Types:** Chrysotile 2.0% **Other Material:** Non-fibrous 98%			
406-65	124041036-65L2	***No***	NAD
9	**Location:** VFT, Tan With Brown Splotches/Tan Mastic; R9/Floor/Under Carpet		(by CVES) by Eric H. Ahles on 04/04/24
Analyst Description: Yellow, Homogeneous, Non-Fibrous, Mastic **Asbestos Types:** **Other Material:** Non-fibrous 100%			
406-66	124041036-66L1		NA/PS
9	**Location:** VFT, Tan With Brown Splotches/Tan Mastic; R9/Floor/Under Carpet		
Analyst Description: Floor Tile **Asbestos Types:** **Other Material:**			

See Reporting notes on last page

PLM Bulk Asbestos Report

2403401; 40600 Hwy 299, Willow Creek, CA

Client No. / HGA	Lab No.	Asbestos Present	Total % Asbestos
406-66 9	124041036-66L2 **Location:** VFT, Tan With Brown Splotches/Tan Mastic; R9/Floor/Under Carpet	***No***	NAD (by CVES) by Eric H. Ahles on 04/04/24
Analyst Description: Yellow, Homogeneous, Non-Fibrous, Mastic **Asbestos Types:** **Other Material:** Non-fibrous 100%			
406-67 10	124041036-67 **Location:** SF, Tan; R1/Floor/Only Layer	***No***	NAD (by CVES) by Eric H. Ahles on 04/04/24
Analyst Description: Tan, Heterogeneous, Non-Fibrous, Sheet Flooring **Asbestos Types:** **Other Material:** Cellulose 30%, Non-fibrous 70%			
406-68 10	124041036-68 **Location:** SF, Tan; R1/Floor/Only Layer	***No***	NAD (by CVES) by Eric H. Ahles on 04/04/24
Analyst Description: Tan, Heterogeneous, Non-Fibrous, Sheet Flooring **Asbestos Types:** **Other Material:** Cellulose 30%, Non-fibrous 70%			
406-69 10	124041036-69 **Location:** SF, Tan; BA1/Floor/Top Layer	***No***	NAD (by CVES) by Eric H. Ahles on 04/04/24
Analyst Description: Tan, Heterogeneous, Non-Fibrous, Sheet Flooring **Asbestos Types:** **Other Material:** Cellulose 30%, Non-fibrous 70%			
406-70 11	124041036-70 **Location:** SF, Tan Mosaic; BA1/Floor/2nd Layer	***Yes***	20% (by CVES) by Eric H. Ahles on 04/04/24
Analyst Description: Tan, Heterogeneous, Non-Fibrous, Sheet Flooring **Asbestos Types:** Chrysotile 20% **Other Material:** Cellulose 10%, Non-fibrous 70%			
406-71 11	124041036-71 **Location:** SF, Tan Mosaic; BA1/Floor/2nd Layer		NA/PS
Analyst Description: Sheet Flooring **Asbestos Types:** **Other Material:**			

See Reporting notes on last page

PLM Bulk Asbestos Report

2403401; 40600 Hwy 299, Willow Creek, CA

Client No. / HGA	Lab No.	Asbestos Present	Total % Asbestos
406-72 12	124041036-72L1 **Location:** SF, Brown/Green Felt Back; BA1/Floor/Bottom Layer	***No***	NAD (by CVES) by Eric H. Ahles on 04/04/24
Analyst Description: Brown, Heterogeneous, Non-Fibrous, Sheet Flooring **Asbestos Types:** **Other Material:** Cellulose 20%, Non-fibrous 80%			
406-72 12	124041036-72L2 **Location:** SF, Brown/Green Felt Back; BA1/Floor/Bottom Layer	***No***	NAD (by CVES) by Eric H. Ahles on 04/04/24
Analyst Description: Green, Heterogeneous, Fibrous, Felt **Asbestos Types:** **Other Material:** Cellulose 99%, Non-fibrous 1.0%			
406-73 12	124041036-73L1 **Location:** SF, Brown/Green Felt Back; BA1/Floor/Bottom Layer	***No***	NAD (by CVES) by Eric H. Ahles on 04/04/24
Analyst Description: Brown, Heterogeneous, Non-Fibrous, Sheet Flooring **Asbestos Types:** **Other Material:** Cellulose 20%, Non-fibrous 80%			
406-73 12	124041036-73L2 **Location:** SF, Brown/Green Felt Back; BA1/Floor/Bottom Layer	***No***	NAD (by CVES) by Eric H. Ahles on 04/04/24
Analyst Description: Green, Heterogeneous, Fibrous, Felt **Asbestos Types:** **Other Material:** Cellulose 99%, Non-fibrous 1.0%			
406-74	124041036-74 **Location:** Tar Paper, Black; R4/Floor/On Sub-Floor	***No***	NAD (by CVES) by Eric H. Ahles on 04/04/24
Analyst Description: Black, Heterogeneous, Fibrous, Tar Paper **Asbestos Types:** **Other Material:** Cellulose 60%, Non-fibrous 40%			
406-75	124041036-75 **Location:** Tar Paper, Black; R5/Floor/On Sub-Floor	***No***	NAD (by CVES) by Eric H. Ahles on 04/04/24
Analyst Description: Black, Heterogeneous, Fibrous, Tar Paper **Asbestos Types:** **Other Material:** Cellulose 60%, Non-fibrous 40%			

See Reporting notes on last page

PLM Bulk Asbestos Report

2403401; 40600 Hwy 299, Willow Creek, CA

Client No. / HGA	Lab No.	Asbestos Present	Total % Asbestos
406-76 13	124041036-76 **Location:** SF, Yellow & Black; BA2/Wall/Behind Drywall	***No***	NAD (by CVES) by Eric H. Ahles on 04/04/24
Analyst Description: Yellow/Black, Heterogeneous, Fibrous, Sheet Flooring **Asbestos Types:** **Other Material:** Cellulose 50%, Non-fibrous 50%			
406-77 13	124041036-77 **Location:** SF, Yellow & Black; BA2/Wall/Behind Drywall	***No***	NAD (by CVES) by Eric H. Ahles on 04/05/24
Analyst Description: Yellow/Black, Heterogeneous, Fibrous, Sheet Flooring **Asbestos Types:** **Other Material:** Cellulose 50%, Non-fibrous 50%			
406-78	124041036-78 **Location:** SF, Tan; R12/Floor/Top Layer	***No***	NAD (by CVES) by Eric H. Ahles on 04/05/24
Analyst Description: Tan, Heterogeneous, Fibrous, Sheet Flooring **Asbestos Types:** **Other Material:** Cellulose 40%, Non-fibrous 60%			
406-79	124041036-79 **Location:** SF, Blue; R12/Floor/Bottom Layer	***No***	NAD (by CVES) by Eric H. Ahles on 04/05/24
Analyst Description: Blue, Heterogeneous, Fibrous, Sheet Flooring **Asbestos Types:** **Other Material:** Cellulose 40%, Non-fibrous 60%			
406-80	124041036-80 **Location:** Sink Pan Undercoat, Black; R9/Underside Of Sink Pan	***Yes***	2.0% (by CVES) by Eric H. Ahles on 04/05/24
Analyst Description: Black, Heterogeneous, Non-Fibrous, Undercoating **Asbestos Types:** Chrysotile 2.0% **Other Material:** Non-fibrous 98%			
406-81	124041036-81 **Location:** Window Putty, Red; Ext/Window	***Yes***	Trace (<1.0 %) (by CVES) by Eric H. Ahles on 04/05/24
Analyst Description: Red, Heterogeneous, Non-Fibrous, Putty **Asbestos Types:** Chrysotile <1. % **Other Material:** Non-fibrous 100%			

See Reporting notes on last page

PLM Bulk Asbestos Report

2403401; 40600 Hwy 299, Willow Creek, CA

Client No. / HGA	Lab No.	Asbestos Present	Total % Asbestos
406-82	124041036-82	***Yes***	Trace (<1.0 %) (by CVES) by Eric H. Ahles on 04/05/24
Location: Window Putty, Red; Ext/Window			
Analyst Description: Red, Heterogeneous, Non-Fibrous, Putty **Asbestos Types:** Chrysotile <1. % **Other Material:** Non-fibrous 100%			
406-83	124041036-83	***Yes***	Trace (<1.0 %) (by CVES) by Eric H. Ahles on 04/05/24
Location: Window Putty, Gray; Ext/Window			
Analyst Description: Gray, Heterogeneous, Non-Fibrous, Putty **Asbestos Types:** Chrysotile <1. % **Other Material:** Non-fibrous 100%			
406-84	124041036-84	***Yes***	2.0% (by CVES) by Eric H. Ahles on 04/05/24
Location: Window Putty, White; Ext/Window			
Analyst Description: White, Heterogeneous, Non-Fibrous, Putty **Asbestos Types:** Chrysotile 2.0% **Other Material:** Non-fibrous 98%			
406-85	124041036-85L1	***No***	NAD (by CVES) by Eric H. Ahles on 04/05/24
Location: Siding, Gray Comp/Brown Fiberboard/Black Tar Paper; Ext/Siding			
Analyst Description: Gray/Black, Heterogeneous, Non-Fibrous, Siding **Asbestos Types:** **Other Material:** Cellulose Trace, Non-fibrous 100%			
406-85	124041036-85L2	***No***	NAD (by CVES) by Eric H. Ahles on 04/05/24
Location: Siding, Gray Comp/Brown Fiberboard/Black Tar Paper; Ext/Siding			
Analyst Description: Brown, Heterogeneous, Fibrous, Fiber Board **Asbestos Types:** **Other Material:** Cellulose 100%			
406-85	124041036-85L3	***No***	NAD (by CVES) by Eric H. Ahles on 04/05/24
Location: Siding, Gray Comp/Brown Fiberboard/Black Tar Paper; Ext/Siding			
Analyst Description: Black, Heterogeneous, Fibrous, Tar Paper **Asbestos Types:** **Other Material:** Cellulose 50%, Non-fibrous 50%			

See Reporting notes on last page

PLM Bulk Asbestos Report

2403401; 40600 Hwy 299, Willow Creek, CA

Client No. / HGA	Lab No.	Asbestos Present	Total % Asbestos
406-86	124041036-86L1	***No***	NAD
Location: Siding, Gray Comp/Brown Fiberboard/Black Tar Paper; Ext/Siding			(by CVES) by Eric H. Ahles on 04/05/24
Analyst Description: Gray/Black, Heterogeneous, Non-Fibrous, Siding			
Asbestos Types:			
Other Material: Cellulose Trace, Non-fibrous 100%			
406-86	124041036-86L2	***No***	NAD
Location: Siding, Gray Comp/Brown Fiberboard/Black Tar Paper; Ext/Siding			(by CVES) by Eric H. Ahles on 04/05/24
Analyst Description: Brown, Heterogeneous, Fibrous, Fiber Board			
Asbestos Types:			
Other Material: Cellulose 100%			
406-86	124041036-86L3	***No***	NAD
Location: Siding, Gray Comp/Brown Fiberboard/Black Tar Paper; Ext/Siding			(by CVES) by Eric H. Ahles on 04/05/24
Analyst Description: Black, Heterogeneous, Fibrous, Tar Paper			
Asbestos Types:			
Other Material: Cellulose 50%, Non-fibrous 50%			
406-87	124041036-87L1	***No***	NAD
Location: Siding, Gray Comp/Brown Fiberboard/Black Tar Paper; Ext/Siding			(by CVES) by Eric H. Ahles on 04/05/24
Analyst Description: Gray/Black, Heterogeneous, Non-Fibrous, Siding			
Asbestos Types:			
Other Material: Cellulose Trace, Non-fibrous 100%			
406-87	124041036-87L2	***No***	NAD
Location: Siding, Gray Comp/Brown Fiberboard/Black Tar Paper; Ext/Siding			(by CVES) by Eric H. Ahles on 04/05/24
Analyst Description: Brown, Heterogeneous, Fibrous, Fiber Board			
Asbestos Types:			
Other Material: Cellulose 100%			
406-87	124041036-87L3	***No***	NAD
Location: Siding, Gray Comp/Brown Fiberboard/Black Tar Paper; Ext/Siding			(by CVES) by Eric H. Ahles on 04/05/24
Analyst Description: Black, Heterogeneous, Fibrous, Tar Paper			
Asbestos Types:			
Other Material: Cellulose 50%, Non-fibrous 50%			

See Reporting notes on last page

PLM Bulk Asbestos Report

2403401; 40600 Hwy 299, Willow Creek, CA

Client No. / HGA	Lab No.	Asbestos Present	Total % Asbestos
406-88	124041036-88L1	***No***	NAD
Location: Siding, Gray Comp/Brown Fiberboard/Black Tar Paper; Ext/Siding			(by CVES) by Eric H. Ahles on 04/05/24
Analyst Description: Gray/Black, Heterogeneous, Non-Fibrous, Siding			
Asbestos Types:			
Other Material: Cellulose Trace, Non-fibrous 100%			
406-88	124041036-88L2	***No***	NAD
Location: Siding, Gray Comp/Brown Fiberboard/Black Tar Paper; Ext/Siding			(by CVES) by Eric H. Ahles on 04/05/24
Analyst Description: Brown, Heterogeneous, Fibrous, Fiber Board			
Asbestos Types:			
Other Material: Cellulose 100%			
406-88	124041036-88L3	***No***	NAD
Location: Siding, Gray Comp/Brown Fiberboard/Black Tar Paper; Ext/Siding			(by CVES) by Eric H. Ahles on 04/05/24
Analyst Description: Black, Heterogeneous, Fibrous, Tar Paper			
Asbestos Types:			
Other Material: Cellulose 50%, Non-fibrous 50%			
406-89	124041036-89	***No***	NAD
Location: Tar Paper, Black; Ext/Siding			(by CVES) by Eric H. Ahles on 04/05/24
Analyst Description: Black, Heterogeneous, Fibrous, Tar Paper			
Asbestos Types:			
Other Material: Cellulose 50%, Non-fibrous 50%			
406-90	124041036-90	***No***	NAD
Location: Tar Paper, Black; Ext/Siding			(by CVES) by Eric H. Ahles on 04/05/24
Analyst Description: Black, Heterogeneous, Fibrous, Tar Paper			
Asbestos Types:			
Other Material: Cellulose 50%, Non-fibrous 50%			
406-91	124041036-91	***No***	NAD
Location: Tar Paper, Black; Ext/Siding			(by CVES) by Eric H. Ahles on 04/05/24
Analyst Description: Black, Heterogeneous, Fibrous, Tar Paper			
Asbestos Types:			
Other Material: Cellulose 50%, Non-fibrous 50%			

See Reporting notes on last page

PLM Bulk Asbestos Report

2403401; 40600 Hwy 299, Willow Creek, CA

Client No. / HGA	Lab No.	Asbestos Present	Total % Asbestos
406-92	124041036-92	***No***	NAD
Location: Concrete, Gray; Ext/Foundation Wall			(by CVES) by Eric H. Ahles on 04/05/24
Analyst Description: Gray, Heterogeneous, Non-Fibrous, Cementitious, Concrete			
Asbestos Types:			
Other Material: Non-fibrous 100%			
406-93	124041036-93	***No***	NAD
Location: Concrete, Gray; Ext/Foundation Wall			(by CVES) by Eric H. Ahles on 04/05/24
Analyst Description: Gray, Heterogeneous, Non-Fibrous, Cementitious, Concrete			
Asbestos Types:			
Other Material: Non-fibrous 100%			
406-94	124041036-94	***No***	NAD
Location: Concrete, Gray; Ext/Foundation Wall			(by CVES) by Eric H. Ahles on 04/05/24
Analyst Description: Gray, Heterogeneous, Non-Fibrous, Cementitious, Concrete			
Asbestos Types:			
Other Material: Non-fibrous 100%			
406-95	124041036-95	***No***	NAD
Location: Concrete, Gray; Ext/Front Step			(by CVES) by Eric H. Ahles on 04/05/24
Analyst Description: Gray, Heterogeneous, Non-Fibrous, Cementitious, Concrete			
Asbestos Types:			
Other Material: Non-fibrous 100%			
406-96	124041036-96	***No***	NAD
Location: Concrete, Gray; Ext/Side Ramp			(by CVES) by Eric H. Ahles on 04/05/24
Analyst Description: Gray, Heterogeneous, Non-Fibrous, Cementitious, Concrete			
Asbestos Types:			
Other Material: Non-fibrous 100%			
406-97	124041036-97	***No***	NAD
Location: Composite Board, Gray; Ext/Window Cover			(by CVES) by Eric H. Ahles on 04/05/24
Analyst Description: Gray, Heterogeneous, Non-Fibrous, Cementitious, Composite Board			
Asbestos Types:			
Other Material: Cellulose 10%, Non-fibrous 90%			

See Reporting notes on last page

PLM Bulk Asbestos Report

2403401; 40600 Hwy 299, Willow Creek, CA

Client No. / HGA	Lab No.	Asbestos Present	Total % Asbestos
406-98	124041036-98	***No***	NAD
Location: Asphalt, Black; Ext/Garage			(by CVES) by Eric H. Ahles on 04/05/24
Analyst Description: Black, Heterogeneous, Non-Fibrous, Asphalt **Asbestos Types:** **Other Material:** Non-fibrous 100%			
406-99	124041036-99	***No***	NAD
Location: Asphalt, Black; Ext/Parking Lot			(by CVES) by Eric H. Ahles on 04/05/24
Analyst Description: Black, Heterogeneous, Non-Fibrous, Asphalt **Asbestos Types:** **Other Material:** Non-fibrous 100%			
406-100	124041036-100	***No***	NAD
Location: Asphalt, Black; Ext/Parking Lot			(by CVES) by Eric H. Ahles on 04/05/24
Analyst Description: Black, Heterogeneous, Non-Fibrous, Asphalt **Asbestos Types:** **Other Material:** Non-fibrous 100%			
406-101	124041036-101	***No***	NAD
Location: Roofing, Brown Comp Shingle; Roof/Main Membrane			(by CVES) by Eric H. Ahles on 04/05/24
Analyst Description: Black/Brown, Heterogeneous, Non-Fibrous, Shingle **Asbestos Types:** **Other Material:** Fibrous glass 1.0%, Non-fibrous 99%			
406-102	124041036-102	***No***	NAD
Location: Roofing, Brown Comp Shingle; Roof/Main Membrane			(by CVES) by Eric H. Ahles on 04/05/24
Analyst Description: Black/Brown, Heterogeneous, Non-Fibrous, Shingle **Asbestos Types:** **Other Material:** Fibrous glass 1.0%, Non-fibrous 99%			
406-103	124041036-103	***No***	NAD
Location: Roofing, Brown Comp Shingle; Roof/Main Membrane			(by CVES) by Eric H. Ahles on 04/05/24
Analyst Description: Black/Brown, Heterogeneous, Non-Fibrous, Shingle **Asbestos Types:** **Other Material:** Fibrous glass 1.0%, Non-fibrous 99%			

See Reporting notes on last page

PLM Bulk Asbestos Report

2403401; 40600 Hwy 299, Willow Creek, CA

Client No. / HGA	Lab No.	Asbestos Present	Total % Asbestos
406-104	124041036-104	***No***	NAD
	Location: Roofing, Brown Comp Shingle; Roof/Main Membrane		(by CVES) by Eric H. Ahles on 04/05/24
Analyst Description: Black/Brown, Heterogeneous, Non-Fibrous, Shingle			
Asbestos Types:			
Other Material: Fibrous glass 1.0%, Non-fibrous 99%			
406-105	124041036-105	***No***	NAD
	Location: Tar Paper, Black; Roof/Main Membrane		(by CVES) by Eric H. Ahles on 04/05/24
Analyst Description: Black, Heterogeneous, Fibrous, Tar Paper			
Asbestos Types:			
Other Material: Cellulose 60%, Non-fibrous 40%			
406-106	124041036-106	***No***	NAD
	Location: Tar Paper, Black; Roof/Main Membrane		(by CVES) by Eric H. Ahles on 04/05/24
Analyst Description: Black, Heterogeneous, Fibrous, Tar Paper			
Asbestos Types:			
Other Material: Cellulose 60%, Non-fibrous 40%			
406-107	124041036-107	***No***	NAD
	Location: Tar Paper, Black; Roof/Main Membrane		(by CVES) by Eric H. Ahles on 04/05/24
Analyst Description: Black, Heterogeneous, Fibrous, Tar Paper			
Asbestos Types:			
Other Material: Cellulose 60%, Non-fibrous 40%			
406-108	124041036-108	***No***	NAD
	Location: Tar Paper, Black; Roof/Main Membrane		(by CVES) by Eric H. Ahles on 04/05/24
Analyst Description: Black, Heterogeneous, Fibrous, Tar Paper			
Asbestos Types:			
Other Material: Cellulose 60%, Non-fibrous 40%			
406-109	124041036-109	***Yes***	5.0%
14	**Location:** Tar Roof Patch, Gray; Roof/Exhaust Vent		(by CVES) by Eric H. Ahles on 04/05/24
Analyst Description: Gray/Black, Heterogeneous, Non-Fibrous, Tar Patch			
Asbestos Types: Chrysotile 5.0%			
Other Material: Non-fibrous 95%			

See Reporting notes on last page

PLM Bulk Asbestos Report

2403401; 40600 Hwy 299, Willow Creek, CA

Client No. / HGA	Lab No.	Asbestos Present	Total % Asbestos
406-110 14	124041036-110 **Location:** Tar Roof Patch, Gray; Roof/Septic Vent		NA/PS
Analyst Description: Tar Patch **Asbestos Types:** **Other Material:**			
406-111 14	124041036-111 **Location:** Tar Roof Patch, Gray; Roof/HVAC Unit		NA/PS
Analyst Description: Tar Patch **Asbestos Types:** **Other Material:**			
406-112	124041036-112.1 **Location:** JC/GB; Ext/Front Porch/Ceiling	***No***	NAD (by CVES) by Eric H. Ahles on 04/05/24
Analyst Description: White, Heterogeneous, Non-Fibrous, Joint Compound **Asbestos Types:** **Other Material:** Non-fibrous 100%			
406-112	124041036-112.2 **Location:** JC/GB; Ext/Front Porch/Ceiling	***No***	NAD (by CVES) by Eric H. Ahles on 04/05/24
Analyst Description: White, Heterogeneous, Non-Fibrous, Gypsum Board **Asbestos Types:** **Other Material:** Cellulose 2.0%, Non-fibrous 98%			
406-113	124041036-113 **Location:** Drywall Texture, Swirl; Ext/Front Porch/Ceiling	***No***	NAD (by CVES) by Eric H. Ahles on 04/05/24
Analyst Description: Gray, Heterogeneous, Non-Fibrous, Textured Joint Compound **Asbestos Types:** **Other Material:** Non-fibrous 100%			
406-114	124041036-114 **Location:** Cardboard, Brown; Garage/Roll Up In Rafters	***No***	NAD (by CVES) by Eric H. Ahles on 04/05/24
Analyst Description: Brown, Heterogeneous, Fibrous, Carboard **Asbestos Types:** **Other Material:** Cellulose 100%			

See Reporting notes on last page

PLM Bulk Asbestos Report

2403401; 40600 Hwy 299, Willow Creek, CA

Reporting Notes:

Analyzed by: Eric H. Ahles  Reviewed by: Eric H. Ahles 

Date: 4/5/2024

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

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

PLM Bulk Asbestos Report

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

Arcata, CA 95518

Date Received 04/09/24
Date Examined 04/11/24

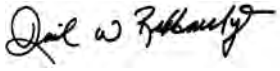
AmeriSci Job # 124041320
P.O. #
Page 1 **of** 1

RE: 2403401; 40600 Hwy 299, Willow Creek, CA (Reference: 124-04-1036)

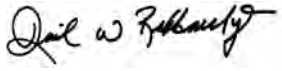
Client No. / HGA	Lab No.	Asbestos Present	Total % Asbestos
406-81	124041320-01	***Yes***	0.5% pc (by 400 pt ct) by David W. Ralbovsky on 04/11/24
Location: Window Putty, Red; Ext/Window			
Analyst Description: White, Heterogeneous, Non-Fibrous, Bulk Material **Asbestos Types:** Chrysotile 0.5% **Other Material:** Non-Asbestos 28%			
406-83	124041320-02	***Yes***	1.3% pc (by 400 pt ct) by David W. Ralbovsky on 04/11/24
Location: Window Putty, Gray; Ext/Window			
Analyst Description: White, Heterogeneous, Non-Fibrous, Bulk Material **Asbestos Types:** Chrysotile 1.3% **Other Material:** Non-Asbestos 49%			
406-84	124041320-03	***Yes***	1.9% pc (by 400 pt ct) by David W. Ralbovsky on 04/11/24
Location: Window Putty, White; Ext Window			
Analyst Description: White, Heterogeneous, Non-Fibrous, Bulk Material **Asbestos Types:** Chrysotile 1.9% **Other Material:** Non-Asbestos 55%			

Reporting Notes:

Analyzed by: David W. Ralbovsky
Date: 4/11/2024



Reviewed by: David W. Ralbovsky



*NAD = no asbestos detected, Detection Limit <1%, Reporting Limits: CVES = 1%, 400 Pt Ct = 0.25%, 1000 Pt Ct = 0.1%; "Present" or NVA = "No Visible Asbestos" are observations made during a qualitative analysis; NA = not analyzed; NA/PS = not analyzed / positive stop; PLM Bulk Asbestos Analysis using Olympus, Model BH-2 microscope, Serial #229707, by EPA 600/R-93/116 per 40 CFR 763 (NVLAP Lab Code 101904-0) and ELAP PLM Analysis Protocol 198.1 for New York friable samples which includes quantitation of any vermiculite observed (198.6 for NOB samples) or EPA 400 pt ct by EPA 600/M4-82-020 (NYSDOH ELAP Lab # 10984); CA ELAP Lab # 2508; Note: PLM is not consistently reliable in detecting asbestos in floor coverings and similar NOB materials. NAD or Trace results by PLM are inconclusive, TEM is currently the only method that can be used to determine if this material can be considered or treated as non-asbestos-containing in New York State (also see EPA Advisory for floor tile, FR 59, 146, 38970, 8/1/94). NIST Accreditation requirements mandate that this report must not be reproduced except in full without the approval of the laboratory. This PLM report relates ONLY to the items tested.

124041086

Analysis:	BRUNELLE & CLARK CONSULTING, LLC	Date: 3/29/24
X Standard PLM ___ 400 Point Count ___ 1,000 Point Count Turnaround Time: Rush/1-day/2-days/3-days/(5-days)	P.O. Box 1138 Arcata, CA 95518 (707) 672-5345 zbconsult@outlook.com	Site: 40600 Hwy 299 Willow Creek, CA Proj. # 240340

BULK ASBESTOS SAMPLING

Sample No.	Sample Description	Location	Mat'l Type	Friability
406-1	JC/GB	R1 / ceiling	MM	NF
-2		R2 / wall		
-3		↓ / ↓		
-4		R3 / ceiling		
-5		BA1 / wall		
-6		↓ / ceiling		
-7		R1 / wall		
-8		R2 / ceiling		
-9	↓	R8 / wall		
-10	JC only	↓ / ↓		
-11	GB only	↓ / ↓	↓	
-12	Drywall/texture, swirl	R5 / on plywood wall panel	SM	
-13		↓ /		
-14		R4 /		
15	↓	↓ / ↓	↓	↓

Sample Abbreviations

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

Material Type

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

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

Sampled by: Zinda Brunelle	Received by: Received
Relinquished by: [signature] Date/Time: 4/2/24	Signature: Date/Time: APR 02 2024

IM pg 1

124041036

Analysis: ☒ Standard PLM ☐ 400 Point Count ☐ 1,000 Point Count Turnaround Time: Rush/1-day/2-days/3-days/(5-days)	BRUNELLE & CLARK CONSULTING, LLC P.O. Box 1138 Arcata, CA 95518 (707) 672-5345 zbconsult@outlook.com	Date: 3/29/24 Site: 40600 Hwy 299 Willow Creek, CA Proj. # 240340

BULK ASBESTOS SAMPLING

Sample No.	Sample Description	Location	Mat'l Type	Friability
406-16	Drywall texture, swirl	BA1 / wall	SM	NF
-17	↓	R1 / ↓	↓	↓
-18		R3 / ceiling		
-19		R2 / wall		
-20	↓	↓ / ↓	↓	↓
-21	Blown in insulation, brown	Attic	TSI	F
-22	↓	↓	↓	↓
-23	↓	↓	↓	↓
-24	Blown in insulation, yellow	↓	↓	↓
-25	↓	↓	↓	↓
-26	↓	↓	↓	↓
-27	GB Only	R10 / wall behind plywood panels	MM	NF
-28	↓	↓ / ↓	↓	↓
-29	CT, orange peel texture pattern (Type 1)	↓ / ceiling	↓	F
-30	↓	Hall / ↓	↓	↓

Sample Abbreviations

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

Material Type

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

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

Sampled by: Zlatar Brunelle	Received by: Received
Relinquished by: [signature] 4/2/24 Date/Time:	Signature: Date/Time: APR 02 2024

IMM pg 2

124041036

Analysis:	BRUNELLE & CLARK CONSULTING, LLC	Date: 3/29/24
X Standard PLM ___ 400 Point Count ___ 1,000 Point Count Turnaround Time: Rush/1-day/2-days/3-days/(5-days)	P.O. Box 1138 Arcata, CA 95518 (707) 672-5345 zbconsult@outlook.com	Site: 40600 Hwy 299 Willow Creek, CA Proj. # Z40340(

BULK ASBESTOS SAMPLING

Sample No.	Sample Description	Location	Mat'l Type	Friability
406-31	CP, Brown fiberboard	BA2 / ceiling	MM	F
-32	↓	↓	↓	↓
-33	JC/GB	wall		NF
-34	↓	↓		↓
-35	↓	R11 / ceiling		↓
-36	CT, orange peel texture pattern (Type 1)	R7 / ↓		F
-37	CT, Knockdown texture pattern (Type 2)	R1 / ceiling / above drywall		↓
-38	↓	↓		↓
-39	CT, smooth (Type 3)	R3 / ↓		↓
-40	↓	↓		↓
-41	CP, brown fiberboard	R12 / ceiling		↓
-42	Electrical wire insulation, Black & Brown	R7 / electrical wire		NF
-43	↓	R3 / ↓		↓
-44	Heater core, Brown cement/fibers	R10 / wall heater		↓
-45	↓	R5 / ↓	↓	↓

Sample Abbreviations

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

Material Type

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

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

Received
APR 02 2024

Sampled by: Zindar Brunelle	Received by:
Relinquished by: 4/2/24 Date/Time:	Signature: Date/Time:

pg 3

124041036

Analysis:	BRUNELLE & CLARK CONSULTING, LLC	Date: 3/29/24
X Standard PLM ___ 400 Point Count ___ 1,000 Point Count Turnaround Time: Rush/1-day/2-days/3-days/(5-days)	P.O. Box 1138 Arcata, CA 95518 (707) 672-5345 zbconsult@outlook.com	Site: 40600 Hwy 299 Willow Creek, CA Proj. # 240340 1

BULK ASBESTOS SAMPLING

Sample No.	Sample Description	Location	Mat'l Type	Friability
406-46	SF, Cream squares with black diamonds	R10 / Floor / Top Layer	MM	F
-47	↓	↓ / ↓ / ↓	↓	↓
-48	VFT (9x9), tan multi-color marble pattern / Black Felt Back	↓ / Bottom layer	↓	↓
-49	↓ / ↓	↓ / ↓	↓	↓
-50	SF, blue / Black Felt Back	BA2 / Bottom layer	↓	↓
-51	↓ / ↓	↓ / ↓	↓	↓
-52	VFT, tan multi-color marble pattern / Black felt back	R11 / Bottom Layer	↓	↓
-53	↓ / ↓	↓ / ↓	↓	↓
-54	SF, Cream	R3 / Top layer	↓	↓
-55	↓	↓ / ↓	↓	↓
-56	↓	R2 / ↓	↓	↓
-57	VFT, tan multi-color marble pattern	↓ / Bottom layer	↓	↓
-58	↓	↓ / ↓	↓	↓
-59	Tarpaper, black	R1 / Bottom layer	↓	NF
-60	↓	R3 / ↓	↓	↓

Sample Abbreviations

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

Material Type

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

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

Sampled by: Zlndar Brunelle	Received by: Received
Relinquished by: [signature] Date/Time: 4/2/24	Signature: Date/Time: APR 02 2024

IW pg 4

124041086

Analysis:	BRUNELLE & CLARK CONSULTING, LLC	Date: 3/29/24
☒ Standard PLM ☐ 400 Point Count ☐ 1,000 Point Count Turnaround Time: Rush/1-day/2-days/3-days/(5-days)	P.O. Box 1138 Arcata, CA 95518 (707) 672-5345 zbconsult@outlook.com	Site: 40600 Hwy 299 Willow Creek, CA Proj. # Z40340 1

BULK ASBESTOS SAMPLING

Sample No.	Sample Description	Location	Mat'l Type	Friability
406-61	VFT, tan multi-color marble pattern / Black felt back	R6 / Floor / under carpet	MM	F
-62		R7		
-63		R8		
-64		R9		
-65	VFT, tan with Brown splotches / Tan mastic			
-66				
-67	SF, tan	R1 / only layer		
-68				
-69		BA1 / Top layer		
-70	SF, tan mosaic	/ 2nd layer		
-71				
-72	SF, brown / green felt back	/ Bottom layer		
-73				
-74	Tarpaper, black	R4 / on sub-floor		NF
-75		R5		

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

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

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

Sampled by: Zindar Brunelle	Received by:
Relinquished by: Zindar Brunelle 4/2/24 Date/Time:	Signature: Received Date/Time:

APR 02 2024

TM pg 5

124041036

Analysis:	BRUNELLE & CLARK CONSULTING, LLC	Date: 3/29/24
X Standard PLM ___ 400 Point Count ___ 1,000 Point Count Turnaround Time: Rush/1-day/2-days/3-days/(5-days)	P.O. Box 1138 Arcata, CA 95518 (707) 672-5345 zbconsult@outlook.com	Site: 40600 Hwy 299 Willow Creek, CA Proj. # 240340

BULK ASBESTOS SAMPLING

Sample No.	Sample Description	Location	Mat'l Type	Friability
406-76 *	SF, yellow & black	BA2 / wall / behind drywall	MM	F
-77	↓	↓ / ↓ / ↓		
-78	SF, tan	R12 / floor / top layer		
-79	SF, blue	↓ / ↓ / bottom layer		↓
-80	sink pan undercoat, black	R9 / underside of sink pan		NF
-81	window putty, red	Ext. / window		
-82	↓	/ /		
-83	window putty, gray	/ /		
-84	window putty, white	/ /		
-85	siding, comp. gray / fiberboard brown / tarpaper black	/ siding		
-86		/ /		
-87		/ /		
-88	↓ / ↓ / ↓	/		
-89	Tarpaper, black	/		
-90	↓	↓ / ↓	↓	↓

Sample Abbreviations

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

Material Type

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

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

Sampled by: Zladar Brunelle	Received by:
Relinquished by: Zladar Brunelle 4/2/24 Date/Time:	Signature: Received Date/Time: APR 02 2024

IW pg6

124041036

Analysis: X Standard PLM ___ 400 Point Count ___ 1,000 Point Count Turnaround Time: Rush/1-day/2-days/3-days/(5-days)	BRUNELLE & CLARK CONSULTING, LLC P.O. Box 1138 Arcata, CA 95518 (707) 672-5345 zbconsult@outlook.com	Date: 3/29/24 Site: 40600 Hwy 299 Willow Creek, CA Proj. # 240340

BULK ASBESTOS SAMPLING

Sample No.	Sample Description	Location	Mat'l Type	Friability
406-91	Tarpaper, black	Ext. / siding	MM	NF
-92	Concrete, gray	/ foundation wall		
-93		/		
-94		/		
-95		/ front step		
-96		/ side ramp		
-97	composite board, gray	/ window cover		
-98	Asphalt, black	/ Garage		
-99		/ Parking lot		
-100				
-101	Roofing, Brown comp. shingle	Roof / main membrane		
-102				
-103				
-104				
-105	Tarpaper, black			

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

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

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

Sampled by: Zinda Brunelle	Received by:
Relinquished by: Zinda Brunelle 4/2/24 Date/Time:	Signature: Received Date/Time:

APR 02 2024

TW pg 7

124041036

Analysis:	BRUNELLE & CLARK CONSULTING, LLC	Date: 3/29/24
X Standard PLM ___ 400 Point Count ___ 1,000 Point Count Turnaround Time: Rush/1-day/2-days/3-days/5-days	P.O. Box 1138 Arcata, CA 95518 (707) 672-5345 zbconsult@outlook.com	Site: 40600 Hwy 299 Willow Creek, CA Proj. # Z40340(

BULK ASBESTOS SAMPLING

Sample No.	Sample Description	Location	Mat'l Type	Friability
406-106	Tarpaper, black	Roof / main membrane	MM	NF
-107				
-108				
-109	Tar roof patch, gray	/ exhaust vent		
-110		/ septic vent		
-111		/ HVAC unit		
-112	JC/GB	Ext. Front Porch/ceiling		
-113	Drywall texture, swirl		SM	
-114	Cardboard, brown	Garage / roll up in rafters	MM	

Sample Abbreviations

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

Material Type

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

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

Sampled by: Zhida Brunelle	Received by:
Relinquished by: Zhida Brunelle 4/2/24 Date/Time:	Signature: Received Date/Time: APR 02 2024

TM pg 8

XRF Paint Analyzer Data Sheet

40600 Hwy 299
Willow Creek, CA

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

Reading #	Concentration	Units	3 SD	NomSecs	Date	Time	User	Analytic Mode
1	1	mg/cm2	0.3	5	3/29/2024	22:29:47	zburnelle	Lead Paint
2	0.9	mg/cm2	0.3	5	3/29/2024	22:31:28	zburnelle	Lead Paint
3	0.9	mg/cm2	0.3	5	3/29/2024	22:33:09	zburnelle	Lead Paint
4	-0.1	mg/cm2	0.4	2	3/29/2024	22:36:17	zburnelle	Lead Paint
5	-0.1	mg/cm2	0.4	2	3/29/2024	22:37:16	zburnelle	Lead Paint
6	0.1	mg/cm2	0.4	2	3/29/2024	22:38:18	zburnelle	Lead Paint
7	0.1	mg/cm2	0.4	2	3/29/2024	22:44:25	zburnelle	Lead Paint
8	0.1	mg/cm2	0.4	2	3/29/2024	22:46:12	zburnelle	Lead Paint
9	0.1	mg/cm2	0.4	2	3/29/2024	22:47:21	zburnelle	Lead Paint
10	0.1	mg/cm2	0.4	2	3/29/2024	22:48:31	zburnelle	Lead Paint
11	0.1	mg/cm2	0.4	2	3/29/2024	22:49:33	zburnelle	Lead Paint
12	0.4	mg/cm2	0.4	2	3/29/2024	22:50:44	zburnelle	Lead Paint
13	0.1	mg/cm2	0.4	2	3/29/2024	22:51:35	zburnelle	Lead Paint
14	0.1	mg/cm2	0.4	2	3/29/2024	22:52:50	zburnelle	Lead Paint
15	-0.1	mg/cm2	0.4	2	3/29/2024	22:54:35	zburnelle	Lead Paint
16	0.1	mg/cm2	0.4	2	3/29/2024	22:55:50	zburnelle	Lead Paint
17	-0.2	mg/cm2	0.4	2	3/29/2024	22:58:36	zburnelle	Lead Paint
18	0	mg/cm2	0.4	2	3/29/2024	23:03:45	zburnelle	Lead Paint
19	0	mg/cm2	0.4	2	3/29/2024	23:05:26	zburnelle	Lead Paint
20	0.1	mg/cm2	0.4	2	3/29/2024	23:06:34	zburnelle	Lead Paint
21	0	mg/cm2	0.4	2	3/29/2024	23:07:37	zburnelle	Lead Paint
22	0	mg/cm2	0.4	2	3/29/2024	23:08:46	zburnelle	Lead Paint
23	0.2	mg/cm2	0.4	2	3/29/2024	23:09:42	zburnelle	Lead Paint
24	0.1	mg/cm2	0.4	2	3/29/2024	23:10:46	zburnelle	Lead Paint
25	-0.1	mg/cm2	0.4	2	3/29/2024	23:12:02	zburnelle	Lead Paint
26	0	mg/cm2	0.4	2	3/29/2024	23:12:50	zburnelle	Lead Paint
27	0.1	mg/cm2	0.4	2	3/29/2024	23:13:38	zburnelle	Lead Paint

XRF Paint Analyzer Data Sheet

40600 Hwy 299

Willow Creek, CA

28	0.2	mg/cm2	0.4	2	3/29/2024	23:14:46	zburnelle	Lead Paint
29	0.1	mg/cm2	0.4	2	3/29/2024	23:15:38	zburnelle	Lead Paint
30	-0.3	mg/cm2	0.4	2	3/29/2024	23:16:38	zburnelle	Lead Paint
31	0	mg/cm2	0.4	2	3/29/2024	23:17:58	zburnelle	Lead Paint
32	0	mg/cm2	0.4	2	3/29/2024	23:18:43	zburnelle	Lead Paint
33	0.1	mg/cm2	0.4	2	3/29/2024	23:19:32	zburnelle	Lead Paint
34	-0.1	mg/cm2	0.4	2	3/29/2024	23:20:24	zburnelle	Lead Paint
35	0.1	mg/cm2	0.4	2	3/29/2024	23:21:16	zburnelle	Lead Paint
36	0	mg/cm2	0.4	2	3/29/2024	23:22:12	zburnelle	Lead Paint
37	0	mg/cm2	0.4	2	3/29/2024	23:23:23	zburnelle	Lead Paint
38	0.1	mg/cm2	0.4	2	3/29/2024	23:24:32	zburnelle	Lead Paint
39	-0.1	mg/cm2	0.4	2	3/29/2024	23:25:39	zburnelle	Lead Paint
40	0	mg/cm2	0.4	2	3/29/2024	23:26:26	zburnelle	Lead Paint
41	0	mg/cm2	0.4	2	3/29/2024	23:27:33	zburnelle	Lead Paint
42	-0.1	mg/cm2	0.4	2	3/29/2024	23:28:32	zburnelle	Lead Paint
43	0.2	mg/cm2	0.4	2	3/29/2024	23:29:27	zburnelle	Lead Paint
44	0.4	mg/cm2	0.4	3	3/29/2024	23:30:48	zburnelle	Lead Paint
45	-0.2	mg/cm2	0.4	2	3/29/2024	23:31:48	zburnelle	Lead Paint
46	0.4	mg/cm2	0.4	3	3/29/2024	23:33:20	zburnelle	Lead Paint
47	0.1	mg/cm2	0.4	2	3/29/2024	23:34:19	zburnelle	Lead Paint
48	0.4	mg/cm2	0.4	3	3/29/2024	23:35:22	zburnelle	Lead Paint
49	1	mg/cm2	0.3	5	3/29/2024	23:38:37	zburnelle	Lead Paint
50	1	mg/cm2	0.3	5	3/29/2024	23:40:52	zburnelle	Lead Paint
51	1	mg/cm2	0.3	5	3/29/2024	23:42:35	zburnelle	Lead Paint

APPENDIX D
NESHAP Notification Form

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

COMPLIANCE ADVISORY
ASBESTOS NESHAP APPLICABILITY
TO DEMOLITION AND RENOVATION PROJECTS

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

Definitions

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

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

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

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

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

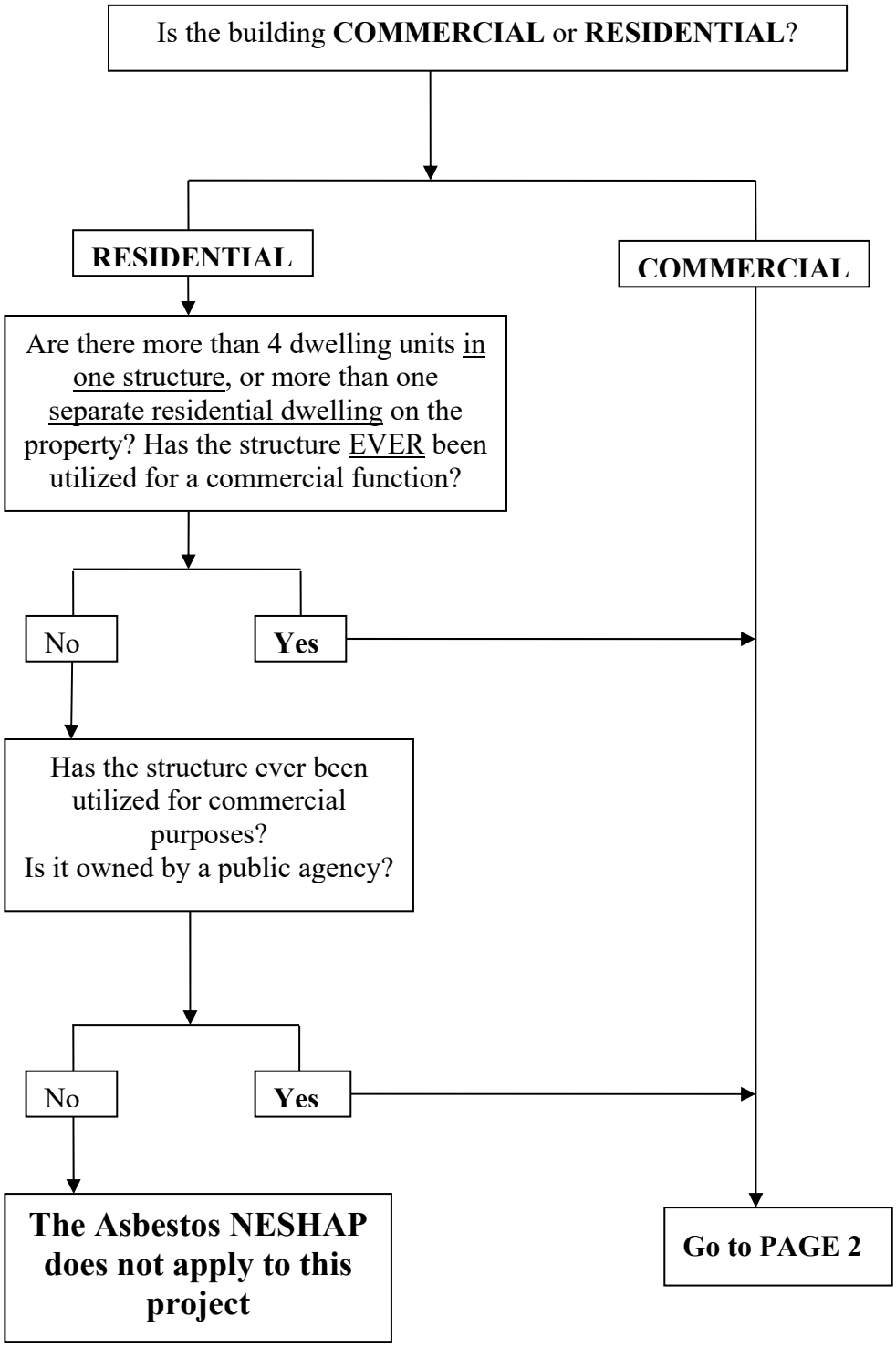
For a demolition - Upon completion of the asbestos survey, a demolition notification form must be submitted to the District at least 10 working days prior to the start date of the demolition. Notification of a demolition is required regardless of the amount of asbestos present. When asbestos-containing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

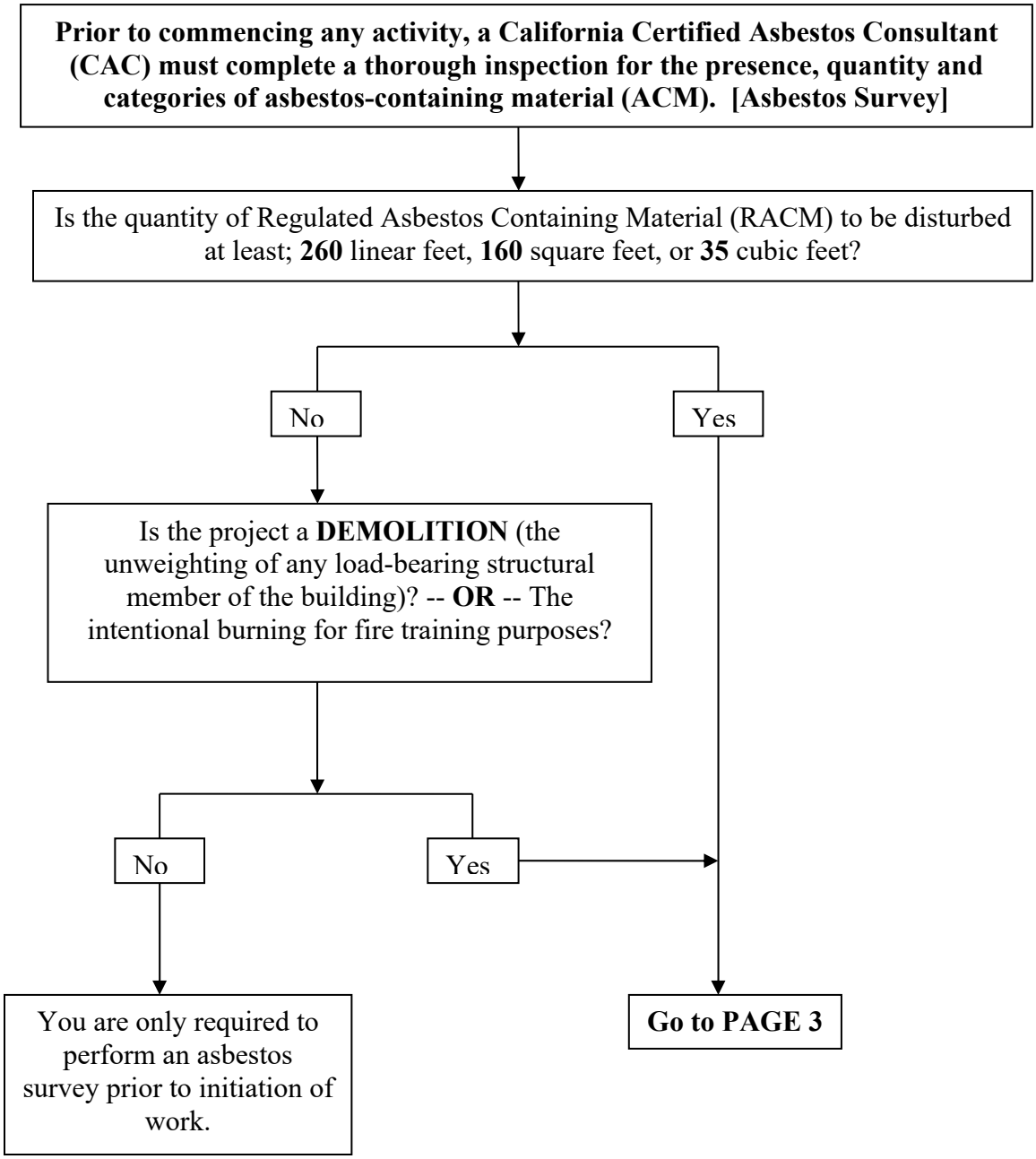
Other Training Requirements – *When removing or disturbing RACM, an AHERA-accredited Contractor/Supervisor must be present and all workers must be AHERA-accredited Workers (40 CFR 763, Subpart E, App. C). All training must be current.*

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

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

GUIDE TO ASBESTOS NESHAP QUESTIONS




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

REGULATED RENOVATIONS AND DEMOLITIONS

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

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

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

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

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

ASBESTOS DEMOLITION AND RENOVATION NOTIFICATION FORM
GENERAL INFORMATION

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

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

INSTRUCTIONS:

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

FEES AND OTHER REQUIREMENTS:

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

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

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

NORTH COAST UNIFIED AIR QUALITY MANAGEMENT DISTRICT

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

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

Operator Project #	Postmark	Date Received	Notification #

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

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

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

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

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

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

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

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

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

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

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

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

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

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

XII. WASTE TRANSPORTER #1

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

WASTE TRANSPORTER #2

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

XIII. WASTE DISPOSAL SITE

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

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

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

XV. FOR EMERGENCY RENOVATIONS

Date and Hour of Emergency (*mm/dd/yy*):

Description of the Sudden, Unexpected Event:

Explanation of how the event caused unsafe conditions or would cause equipment damage or an unreasonable financial burden:

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

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

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

XVIII. I CERTIFY THAT THE ABOVE INFORMATION IS CORRECT.

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

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

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

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

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

APPENDIX E
Consultant Certifications

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

Zindar Brunelle
Name

Certification No. 14-5295

Expires on 10/15/24

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

California Department of PublicHealth

STATE OF CALIFORNIA
DEPARTMENT OF PUBLIC HEALTH

LEAD-RELATED CONSTRUCTION CERTIFICATE

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

Zindar Brunelle

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

CALINC TRAINING LLC

This is to certify that

Zindar Brunelle

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

Asbestos Contractor Supervisor Refresher 1010

as required under Toxic Substances Control Act Title II

1/9/2024		178082
Class Date(s)		Certificate Number
David Esparza - President	CA-001-04	1/9/2025
	Cal/OSHA Number	Expiration Date

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