ARDENT
ENVIRONMENTAL
GROUP, INC.

HAZARDOUS MATERIALS REMOVAL WORKPLAN
BUILDING DEMOLITION
111 NORTH HUDSON AVENUE
CITY OF INDUSTRY, CALIFORNIA

PREPARED FOR:
Industry Urban-Development Agency
15625 East Stafford Street, Suite 200
City of Industry, California 91744

PREPARED BY:
Ardent Environmental Group, Inc.
1141 Pomona Road, Suite E
Corona, California 92882

September 7, 2010
Project No. 100148003

Phone: (951) 736-5334
Fax: (951) 736-7560

1141 Pomona Road, Suite E
Corona, California 92882

ARDENT ENVIRONMENTAL GROUP, INC.

September 7, 2010
Project No. 100148003

Mr. Kevin Radecki
Industry Urban-Development Agency
15625 East Stafford Street, Suite 200
City of Industry, California 91744

Subject: Hazardous Materials Removal Workplan
Building Demolition at
111 North Hudson Avenue
City of Industry, California

Dear Mr. Radecki:

In accordance with your authorization, Ardent Environmental Group, Inc. has completed this Hazardous Materials Removal Workplan associated with the demolition of the building located at 111 North Hudson Avenue, City of Industry, California.

We appreciate the opportunity to be of service to you on this important project.

Sincerely,
Ardent Environmental Group, Inc.

Paul A. Roberts, P.G., R.E.A. I/II
Principal Geologist

Craig Metheny, R.E.A., C.A.C
Principal Geologist

CM/PAR/paw

Distribution: (1) Addressee
(2) Dale Masl, CNC Engineering (1 hard copy and 1 electronic copy on disk)

Phone: (951) 736-5334
Fax: (951) 736-7560

1141 Pomona Road, Suite E
Corona, California 92882

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DEFINITIONS

"Agency" means the Industry Urban-Development Agency, or "Owner."

"Agency Engineer" shall mean the person or agents duly authorized by the Agency to serve in the capacity of Agency Engineer.

"Aggressive method" means removal or disturbance of building material by sanding, abrading, grinding, or other method that breaks, crumbles, or disintegrates intact asbestos-containing materials (ACM).

"Amended water" means water to which surfactant (wetting agent) has been added to increase the ability of the liquid to penetrate ACM.

"Area Sampling" means sampling of asbestos fiber concentrations which approximates the concentrations of asbestos in the theoretical breathing zone but is not actually collected in the breathing zone of an employee.

"Asbestos" includes chrysotile, amosite, crocidolite, tremolite asbestos, anthophyllite asbestos, actinolite asbestos, and any of these materials that has been chemically treated and/or altered. "Asbestos" includes Presumed Asbestos-Containing Material (PACM).

"Asbestos Consultant" shall be the independent party retained by the Owner to provide consultation and supervision services for asbestos abatement activities.

"Asbestos-containing construction material (ACCM)" means any material containing more than one tenth of one percent asbestos.

"ACM" means any material containing more than one percent asbestos.

"ACCM" means asbestos-containing construction material which contains less than one percent asbestos but is assumed to contain greater than 0.1 percent asbestos.

"Authorized person" means any person authorized by the employer and required by work duties to be present in regulated areas.

"CFC" means chlorofluorocarbon.

"Class I asbestos work" means activities involving the removal of thermal system insulation (TSI) and surfacing ACM and PACM.

"Class II asbestos work" means activities involving the removal of ACM which is not TSI or surfacing material. This includes, but is not limited to, the removal of asbestos-containing wallboard, floor tile, sheeting, roofing and siding shingles, and construction mastics.

"Clean room" means an uncontaminated room having facilities for the storage of employees' street clothing and uncontaminated materials and equipment.

"Closely resemble" means that the major workplace conditions, which contributed to the levels of historic asbestos exposure, are no more protective than the conditions of the current workplace.

"Competent person" means, in addition to one who is capable of identifying existing and predictable hazards in the surroundings or working conditions which are unsanitary, hazardous, or dangerous to employees; and who has authorization to take prompt corrective measures to eliminate them; in addition, for Class I and Class II work, one who is specially trained in a training course which meet the criteria of the Environmental Protective Agency (EPA) Model Accreditation Plan (40 CFR 763) for project designer or supervisor, or equivalent.

"Contractor" means the party entering into contract with the Agency for the performance of the work required by the Project Specifications.

"Critical barrier" means one or more layers of plastic sealed over all openings into a work area or any other similarly placed physical barrier sufficient to prevent airborne asbestos in a work area from migrating to an adjacent area.

"Decontamination area" means an enclosed area adjacent and connected to the regulated area and consisting of an equipment room, shower area, and clean room, which is used for the decontamination of workers, materials, and equipment that are contaminated with asbestos.

"Demolition" means the wrecking or removal of load-supporting structural member and any related razing, removing, or stripping of asbestos products.

"Disturbance" means an activity that releases fibers from ACM or PACM or debris containing ACM or PACM. This term includes activities that disrupt the matrix of ACM or PACM, render ACM or PACM friable, or generate visible debris. Disturbance includes cutting away small amounts of ACM and PACM, no greater than the amount which can be contained in one standard-sized glove bag or waste bag in order to access a building component.

"Employee exposure" means exposure to airborne asbestos that would occur if an employee were not using respiratory protective equipment.

"Encapsulants" means specific materials in various forms used to chemically or physically entrap asbestos fibers in various configurations to prevent these fibers from becoming airborne. There are four types of encapsulants as follows which must comply with performance requirements as specified herein.

- Removal Encapsulant (can be used as a wetting agent).
- Bridging Encapsulant (used to provide a tough, durable surface coating to ACM).
- Penetrating Encapsulant (used to penetrate the ACM encapsulating all asbestos fibers and preventing fiber release due to routine mechanical damage).

- Lock-Down Encapsulant (used to seal off or "lock-down" minute asbestos fibers left on surfaces from which ACM has been removed).

"Equipment room (change room)" means a contaminated room located within the decontamination area that is supplied with impermeable bags or containers for the disposal of contaminated protective clothing and equipment.

"Fiber" means a particulate form of asbestos, 5 micrometers or longer, with a length to diameter ratio of at least 3 to 1.

"Glovebag" means an impervious plastic bag-like enclosure affixed around ACM, with glove-like appendages through which materials and tools can be handled.

"HEPA filter" means high-efficiency particulate air filter.

"High-efficiency particulate air (HEPA) filter" means a filter capable of trapping and retaining at least 99.97 percent of all mono-dispersed particles of 0.3 micrometer in diameter, or larger.

"Homogenous area" means an area of surfacing material or TSI that is uniform in color and texture.

"Industrial hygienist" means a professional qualified by education, training, and experience to anticipate, recognize, evaluate, and develop controls for occupational health hazards.

"Intact" means a condition in which the ACM has not crumbled, been pulverized, or otherwise deteriorated so that it is no longer likely to be bound with its matrix.

"Lead-Based Paint" means dried paint containing greater than 0.7 milligrams per square centimeter (mg/cm^2).

"Lead-Bearing Substance" means a paint, varnish, lacquer, putty, plaster, or similar coating or structural material which contains lead in excess of 0.7 milligrams per square centimeter (mg/cm^2).

"LBP" means lead-based paint.

"LACDPW" means Los Angeles County Department of Public Works.

"Negative initial exposure assessment" means a demonstration by the employer which complies with the criteria in 8 CCR 1529, subsection (f) (2) (c), that employee exposure during an operation is expected to be consistently below the Permissible Exposure Limit (PEL).

"NPE" mean negative pressure enclosure.

"Owner" means the Industry Urban-Development Agency, or "Agency."

"Owner's Representative" shall be the independent party retained by the Agency to provide consultation and supervision services for abatement and hazardous material removal activities performed by the Contractor.

"PACM" means "presumed asbestos-containing material."

"PCB" means polychlorinated biphenyl.

"Permissible Exposure Limit" (PEL) means a fiber concentration of 0.1 fibers per cubic centimeter of air as an 8-hour time-weighted average measured in the breathing zone as defined by 29 CFR 1926.1101 and 8 CCR 1529 or other Federal legislation having legal jurisdiction for the protection of workers health.

"Presumed Asbestos-containing Material" (PACM) means TSI and surfacing material found in buildings constructed no later than 1980. The designation of material as "PACM" may be rebutted pursuant to 8 CCR 1529, subsection (k) (4).

"Project Designer" means a person who has successfully completed the training requirements for the abatement project designer established by 40 CFR Sec. 763.90(g).

"Project Specifications" means the Contract Documents and Specifications for the Building Demolition at 13624 Nelson Avenue, City of Industry, prepared by CNC Engineering.

"Regulated area" means an area established by the employer to demarcate areas where Class I, and II asbestos work is conducted, and any adjoining area where debris and waste from such asbestos work accumulate; and a work area within which airborne concentrations of asbestos exceed, or there is a reasonable possibility they may exceed, the PEL.

"Removal" means all operations where ACM and/or PACM are removed or stripped from structures or substrates, and includes demolition operations.

"Renovation" means the modifying of an existing structure, or portion thereof.

"Repair" means overhauling, rebuilding, reconstructing, or reconditioning of structures or substrates, including encapsulation or other repair of ACM or PACM attached to structures or substrates.

"SCAQMD" means South Coast Air Quality Management District.

"Surfacing material" means material that is sprayed, troweled-on, or otherwise applied to surfaces (such as acoustical plaster on ceilings and fireproofing materials on structural members, or other materials on surfaces for acoustical, fireproofing, and other purposes).

"Surfacing ACM" means surfacing material which contains more than 1 percent asbestos.

"Thermal System Insulation" (TSI) means ACM applied to pipes, fittings, boilers, breeching, tanks, ducts, or other structural components to prevent heat loss or gain.

"Workplan" means this document.

1. GENERAL

The Hazardous Materials Removal Workplan (referred to herein as the "Workplan") activities presented herein are to be followed prior to and/or during demolition of the site building and site facilities. This Workplan describes the hazardous building materials and other miscellaneous hazardous materials or wastes located in the site building or on the site. This Workplan will be included as an Exhibit to the Building Demolition Specification (referred to herein as the "Project Specifications") being prepared by CNC Engineering on behalf of the Industry Urban-Development Agency (the "Agency" or "Owner"). The locations and quantities of hazardous building materials, including asbestos-containing materials (ACMs) and lead-based paint (LBP), are based on the results of surveys performed by Ardent Environmental Group, Inc. (Ardent) and Winzler & Kelly. The hazardous building material survey reports, provided in Appendix A, consist of the following.

Ardent Environmental Group, Inc., 2010a, Asbestos Survey, 111 North Hudson Avenue, City of Industry, California: unpublished report dated August 30.

Ardent Environmental Group, Inc. 2010b, Miscellaneous Hazardous Building Material Survey, 111 North Hudson Avenue, City of Industry, California: unpublished report dated August 30.

Winzler & Kelly, 2010, Pre-Demolition Lead Testing Services Report, Warehouse/Office Building, 111 North Hudson Avenue, City of Industry, California: unpublished report dated September 3.

1.1. Project Location and Description

The site is located at 111 North Hudson Avenue in the City of Industry, Los Angeles County, California (Figure 1). The site is designated as Assessor's Parcel Number (APN) 8208-024-027.

The site is a 1.75-acre square-shaped parcel occupied by one approximately 39,600-square foot industrial/warehouse building. The site building was constructed in 1967/1968 and contains an approximately 7,400 square foot office area, including a 1,400 square foot mezzanine, and an approximately 32,000 square foot warehouse area. The site building is of concrete tilt-up construction with wood or metal framed gypsum board interior walls. Floors

are finished with concrete in the warehouse area, with carpet in the office areas, and with sheet vinyl flooring or vinyl floor tiles in restrooms. Ceilings in the office area are finished with suspended acoustic ceiling panels.

1.2. Objective

The objective of this Workplan is to specify the hazardous building materials that will need to be removed from the site building or site area prior to demolition activities and the methods to be used.

1.3. Scope of Work

All work must be completed by State-licensed contractors and in accordance with all regulatory requirements and guidelines. The general scope of work related to the pre-demolition removal or abatement of hazardous or regulated materials or wastes at the site will consist of the following tasks.

- ACMs have not been identified at the site building (Ardent, 2010a). Therefore, pre-demolition abatement/removal and disposal of ACMs, ACCMs, or PACMs will not be required. If unknown ACMs are discovered during demolition activities, the Contractor shall refer to and follow the asbestos abatement procedures outlined in this Workplan.

- Pre-demolition abatement/removal of LBP or other lead-containing materials, as needed, to perform the demolition activities. LBP and other lead-containing materials identified at the site are summarized in Table 1.

- Removal and disposal of other miscellaneous hazardous or universal wastes, including presumed PCB-containing fluorescent light ballasts, fluorescent light tubes, mercury vapor lamps, Freon or CFC gas from air conditioning or refrigeration units, and other miscellaneous materials. Universal wastes and miscellaneous hazardous waste materials identified at the site are summarized in Table 2.

1.4. Owner Responsibilities

- The Owner will provide full and unfettered access to the site and site structures during scheduled working hours agreed to between the Owner and Contractor for the performance of the activities covered in this Workplan.

- The Owner will provide an independent consultant (Owner's Representative) to perform monitoring of asbestos abatement/removal operations and clearance sampling, as needed.

- In the event that apparent contaminated soil is discovered during demolition activities, the Owner's Representative will be available to direct excavation activities, as needed, and to perform sampling, as needed.

1.5. License Requirements

- The Contractor shall be currently licensed for the intended activities with the California Contractors State License Board (CSLB).

- The Contractor or subcontractors shall maintain necessary licenses and/or certifications in conjunction with asbestos removal, encapsulation, hauling, and disposal, and furnish documentation of such licenses and certifications required by Federal, State, regional, and local authorities prior to the start of work.

- The Contractor or subcontractors shall employ at least one individual who has received certification as a California Department of Health Services Contractor/Supervisor.

- The Contractor or subcontractor should be a licensed hazardous waste transporter with the State of California Department of Toxic Substances Control.

- Subcontractors should hold all licenses or certifications applicable to specified trade work.

1.6. Permits

The Contractor shall obtain all permits required by Federal, State and local agencies to complete the work outlined in this Workplan. Agencies from which permits may be required include, but are not limited to, to following.

- Cal/OSHA.

- South Coast Air Quality Management District (SCAQMD).

- Los Angeles County Fire Department.

- Los Angeles County Department of Public Works.

- Others – as required by local agencies for specific tasks.

1.7. Notifications

The Contractor shall make required written notifications, including notifications to the Owner's Representative. Agency notifications that may be required include, but are not limited to, the following.

- Cal/OSHA – The Contractor must send written notification to Cal/OSHA 24 hours prior to commencement of asbestos abatement work, regardless of the amount of asbestos-containing material that is going to be disturbed. Notification shall be in accordance with Title 8, CCR, Chapter 3.2, Subchapter 2, Article 2.5, Section 341.9.

- Cal/OSHA – The Contractor shall provide written notification to Cal/OSHA at least 24 hours before conducting lead-related construction work involving any of the "trigger tasks" identified in Title 8, CCR, Chapter 4, Subchapter 4, Article 4, Section 1532.1. Notification is NOT required when any of the following situations exists: 1) the lead content of the materials being disturbed is less than 0.5%, 5,000 parts per million (weight by weight), or 1.0 mg/cm2; 2) the amount of lead-containing materials to be disturbed is less than 100 square feet or 100 linear feet; or 3) the only (d)(2) task to be performed consists of torch cutting or welding for no longer than 1 hour in any shift.

- SCAQMD – The Contractor shall notify the SCAQMD in writing a minimum of 10 working days prior to commencement of asbestos abatement work in accordance with SCAQMD Rule 1403.

- SCAQMD – The Contractor shall notify the SCAQMD in writing a minimum of 24 hours prior to excavation of soil containing volatile organic compound (VOC) materials in accordance with Rule 1166.

- Owner's Representative – The Contractor shall furnish to the Owner and Owner's Representative a schedule showing the anticipated starting and completion dates for each phase or area of abatement, clarifier removal, and all other hazardous material removal work covered by this Workplan. The schedule shall be furnished prior to the commencement of work and no later than seven calendar days from issuance of the Owner's written Notice to Proceed. This schedule shall be reviewed weekly and updated as required.

1.8. Schedule

A. The work shall be performed in accordance with the schedule in the agreement between the Contractor and Owner.

B. The Contractor shall furnish to the Owner and Owner's Representative a schedule in accordance with the notification requirements outlined above.

C. If asbestos abatement is to be performed, the Contractor shall indicate the number and duration of shifts required to perform abatement monitoring as part of the schedule. If it becomes necessary to maintain the projected schedule, the Owner may request additional manpower to complete the work on time. The Contractor is obligated to comply with this written request from the Owner or Owner's Representative.

1.9. Applicable Regulations

In addition to requirements of this Workplan, the Contractor shall comply with those applicable laws, ordinances, criteria, rules, and regulations of Federal, State, regional, and local authorities regarding handling, storing, transporting, and disposing of asbestos and other hazardous or universal waste and materials. The Contractor shall submit matters of interpretation of standards to the appropriate administrative agency for resolution before starting the work. Where the requirements of this Workplan and applicable laws, rules, criteria, ordinances, and regulations may vary, the most stringent requirement shall apply.

A. The following regulations, referred to by the basic designation only, that may govern work performed by the Contractor under this Workplan may include, but are not limited to, the following.

- Title 29 Code of Federal Regulations (CFR), Subtitle B, Chapter XVII, Part 1910, Occupational Safety and Health Standards.
- Title 29 CFR, Subtitle B, Chapter XVII, Part 1926, Safety and Health Regulations for Construction.
- The Occupational Safety and Health Administration (OSHA) Standards for Asbestos, Title 29 CFR, Parts 1910.1001, 1926.1101, and 1926.62.
- The OSHA Standards for respiratory protection Title 29, CFR, Part 1910.134.
- Title 40 CFR, Chapter I, Environmental Protection Agency, Part 6.1, National Emission Standard for Hazard Air Pollutants, National Emission Standard for Asbestos.
- Title 40 CFR, Chapter I, Environmental Protection Agency, Part 763, Asbestos.
- California Code of Regulations (CCR), Title 8, Subchapter 4, "Construction Safety Orders", Article 4, "Dusts, Fumes, Mists, Vapors, and Gases"
    - Section 1529, "Asbestos"
    - Section 1531, "Respiratory Protective Equipment"

- Section 1532.1, "Lead"

- CCR Title 8, Chapter 3.2, Subchapter 2, Article 2.5, "Registration – Asbestos-Related Work"
  - Section 341.9, "Notification to the Division – Asbestos-Related Work"

- CCR Title 8, Subchapter 7, "General Industry Safety Orders", Group 16, "Control of Hazardous Substances", Article 110, "Regulated Carcinogens"
  - Section 5208, "Asbestos"

- CCR, Title 22, Division 4, Environmental Health.

- CCR, Title 22, Division 4.5, Environmental Health Standards for the Management of Hazardous Waste.

- The Transportation Safety Act, Hazardous Material Transportation Act, 49 CFR Parts 106, 107, and 171-179.

- The Asbestos Hazard Emergency Response Act (AHERA), 40 CFR 763.

- Asbestos School Hazard Abatement Reauthorization Act (ASHARA), 40 CFR 763, Appendix C to Subpart E

- SCAQMD Rule 1403.

- SCAQMD Rule 1166.

- CCR Title 17, Division 1, Chapter 8, Accreditation, Certification, and Work Practices for Lead-Based Paint and Lead Hazards.

- Los Angeles County Code.

1.10. Submittals

The Contractor shall submit the following documentation to the Owner's Representative.

A. The Contractor shall submit a detailed site-specific plan of the safety precautions and work procedures to be used in the hazardous material removal and/or abatement. Such plan shall include but not be limited to the personal protective equipment to be used including, but not limited to, respiratory protection, type of whole-body protection, the location of control areas including clean and dirty areas, buffer zones, showers, storage areas, change rooms, removal method, interface of trades involved in the construction, sequencing of work, disposal plan, and a detailed description of the methods to be employed in order to control environmental pollution.

The plan shall include both fire and medical emergency response plans. The plan will be approved in writing by the Owner's Representative prior to starting any removal work. The Contractor shall meet with the Owner's Representative prior to beginning work, to discuss in detail the work procedures and safety precautions. Once approved, the plan will be enforced as if an addition to the Workplan.

B. If asbestos abatement is to be performed, the Contractor shall submit documentation that each employee has received training in the proper handling of materials and wastes that contain asbestos in accordance with 40 CFR 763, 29 CFR 1926.1101, and 8 CCR 1529; understands the health implications and risks involved, including the illnesses possible from exposure to airborne asbestos fibers; understands the use and limits of the respiratory equipment to be used; and understands the results of monitoring of airborne quantities of asbestos as related to health and respiratory equipment as indicated in 29 CFR 1926.1101 and 8 CCR 1529 on an initial and annual basis. Certificates shall be organized by individual worker, not grouped by type of certification.

C. If lead abatement is to be performed, the Contractor shall also submit documentation that employees are certified through the State of California Department of Health Services, as Lead Workers.

D. If workers will be required to wear respirators, the Contractor should submit a respirator program as required by 40 CFR 763, 29 CFR 1926.1101, and 8 CCR 1529. The Contractor shall submit a written description of the program for review. The Contractor shall submit a written program manual or operating procedure including methods of compliance with regulatory statutes. The Contractor shall submit records of the respirator program as required by 40 CFR 763, 29 CFR 1926.1101, and 8 CCR 1529.

E. If asbestos abatement is to be performed, the Contractor shall submit written evidence that the landfill designated for disposal of asbestos-related wastes is approved for asbestos disposal by California and County regulatory agencies. The Contractor shall submit to the Owner's Representative waste shipment records, prepared in accordance with Federal regulations, signed and dated by an agent of the landfill, certifying the amount of asbestos materials delivered to the landfill, within three working days after delivery. The Contractor shall submit, within three working days, signed copies of hazardous waste manifests and other shipping/disposal/recycling records for other materials.

F. The Contractor shall provide a written certification for each worker and supervisor, signed by a licensed physician indicating that the worker and supervisor have met or exceeded all of the medical prerequisites listed herein and in 40 CFR 763, 29 CFR 1926.1101, and 8 CCR 1529 as prescribed by law.

G. If asbestos abatement is to be performed, following the completion of asbestos abatement activities, the Contractor shall provide an asbestos abatement close-out report to the Owner's Representative that shall include a summary of all materials and quantities removed, agency notifications, daily reports, air monitoring records, personnel monitoring records, and disposal documents and manifests.

H. The Contractor shall provide copies of all disposal or recycling documents and manifests for all hazardous and non-hazardous wastes and materials removed from the site.

1.11. Site Use and Security

A. The Contractor shall be responsible for all security related to all work, storage, and excavation areas.

B. All hazardous materials must be stored in enclosed and locked areas at the end of each work shift, and when no personnel are present. This area must be labeled, in English and Spanish, with proper warning labels.

C. The Contractor shall maintain control of the site security at all times during the course of work to protect the work area and equipment, The Contractor shall also be responsible for the proper storage and security of all equipment and materials left on site during off hours.

1.12. Emergency Planning

Emergency planning and procedures shall be developed by the Contractor, and presented in written form, and prominently posted and approved by the Owner or the Owner's Representative, and shall include:

- Written notification to Police, Fire, and Emergency Medical personnel of planned abatement activities.
- Work schedules and layout of barriers designed not to impede with response capabilities.
- Emergency telephone numbers, and locations of nearest emergency facilities, posted for all workers to see easily.
- Evacuation procedures shall also be written, and posted with the signatures of all workers, to acknowledge their receipt of training in such procedures.

1.13. Fire Protection

A. Plastic, spray-on coatings, and structural components utilized during abatement activities shall be UL-approved, fire retardant, and noncombustible.

B. MSDS sheets for fire retardant materials shall be made available to the Owner's Representative upon request.

C. All waste generated shall be properly disposed of at the end of each working day.

D. The Contractor shall maintain 4A/60BC dry-chemical extinguishers in each work area and ensure site personnel are aware of the locations and use of the extinguishers.

E. Existing fire alarms, fire detection systems, connections, and standpipes in working condition shall remain active during abatement activities.

2. ASBESTOS ABATEMENT (IF NEEDED)

This Workplan provides general guidelines for removal of all types of ACMs. Based on the findings of the Asbestos Survey Report (Ardent, 2010, Appendix A), ACMs have not been identified at the site building and pre-demolition abatement will not be required, If unknown ACMs are discovered during demolition activities, some or all of these guidelines may be used. The Contractor is responsible to know the applicable regulations governing its work and to use the appropriate guidelines based on the survey results.

These general guidelines are provided incase additional ACMs are encountered during demolition activities. If suspect ACMs that have not been previously tested are discovered during demolition, the Contractor shall immediately notify the Owner's Representative so that the material may be tested to determine asbestos content and abatement requirements.

2.1. General

A. The Contractor shall enclose abatement areas under differential air pressure for the duration of the asbestos removal and subsequent cleaning phases, where feasible. The Contractor shall block and seal openings in areas where the release of airborne asbestos fibers can be expected. Establish an asbestos negative pressure enclosure with the use of curtains, portable partitions, or other enclosures in order to prevent the escape of asbestos fibers from the contaminated asbestos work area. Negative pressure enclosure development shall include protective covering of uncontaminated walls and ceilings with a continuous membrane of two layers of minimum 4-mil plastic sheeting sealed with tape to prevent water or other damage. The Contractor shall provide two layers of 6-mil plastic sheet over floors and extend a minimum of 12 inches up walls. Seal all joints with tape. The Contractor shall provide a local exhaust system in the asbestos control area. Openings will be allowed in enclosures of asbestos control areas for personnel and equipment entry and exit, the supply and exhaust of air for the local exhaust system and the removal of properly containerized ACMs. The Contractor shall replace local exhaust system filters as required to maintain the efficiency of the system.

B. Removal and dispose of all ACMs, ACCMs, and PACMs in accordance with the methods and procedures outlined in CCR Title 8, Section 1529. All asbestos removal shall be supervised by a Competent Person.

After removal, all surfaces and areas physically connected to the asbestos removal areas shall be wet-cleaned and HEPA-vacuumed to remove residual accumulated material. After cleaning, surfaces shall appear free of visible material. Prior to the removal of the plastic sheeting from the wall and floor surfaces, apply approved sealant on all concrete substrates, structural steel, and piping surfaces from which the material was removed and to plastic sheeting prior to its removal.

Dispose of all contaminated or otherwise removed materials and wastes in sealed and labeled containers in an approved sanitary landfill. Never use high-pressure air or water streams to remove any type of ACM.

Following related repair work remove any remaining floor and wall plastic, including seals on openings, and dismantle worker waste container/equipment decontamination areas and leave all areas clean. Eating, smoking, or applying cosmetics shall not be permitted in the work areas.

C. The Contractor shall remove contaminated architectural, mechanical, and electrical appurtenances; substrates; and other contaminated items designated for removal by completely coating the items with an asbestos lock-down encapsulant at the demolition site before removing the items from the asbestos control area. These items need not be vacuumed. The asbestos lock-down encapsulant shall be tinted a contrasting color. It shall be spray-applied by an airless method. Thoroughness of sealing operations shall be visually gauged by the extent of colored coating on exposed surfaces.

D. The Contractor shall provide a local exhaust system, where feasible, that creates a negative pressure of at least 0.02 inches of water relative to the pressure external to the enclosure and operate it continuously, 24 hours a day, until the temporary enclosure of the asbestos control area is removed. Submit pressure differential recordings for each work day to the Owner's Representative upon request.

2.2. Class I Asbestos Removal Work

A. Class I asbestos removal work shall be conducted within a negative pressure enclosure (NPE) and shall comply with Title 29 CFR 1926.1101 and Title 8 CCR 1529. At least four air exchanges per hour shall be maintained by the NPE. Before beginning work within the enclosure and at the beginning of each shift, the NPE shall be inspected for breaches and smoke-tested for leaks. Any leaks detected will be sealed by the Contractor. The NPE shall be re-tested after any repairs have been performed. Electrical circuits in the enclosure shall be deactivated and locked out. Temporary power and portable lighting sources will be provided from outside the work area; insure safe installation (including using GFCIs) of temporary power sources and equipment by compliance

with all applicable electrical code requirements and Federal, state and local requirements. Thoroughly wet ACM prior to removal. Accomplish wetting by a fine spray (mist) of amended water or removal encapsulant, applied with airless spray equipment. Mist work area continuously with amended water. Apply mist with airless spray equipment.

2.3. Class II Asbestos Removal Work - General

A. Class II asbestos removal work shall be conducted within a NPE and shall comply with Title 29 CFR 1926.1101 and Title 8 CCR 1529. Class II Asbestos Work shall be with hand tools and, to the extent feasible, substantially intact. Class II removal operations involving the use of mechanized work methods, including motorized floor buffers, mechanical chipping, or other power tools shall be conducted utilizing Class I Asbestos Work methods. Approved low-odor mastic removers may be used to remove ACM mastic provided the waste generated is managed in accordance with applicable state and federal regulations. Use of mastic removers will be followed by a suitable rinse (as per manufacturer's recommendations) to remove any residual mastic remover.

2.4. Class II Asbestos Removal Work - Roofing

A. Asbestos-containing roofing materials shall be removed with hand tools and, to the extent feasible, remain substantially intact and shall comply with Title 29 CCR 1926.1101 and Title 8 CCR 1529. Asbestos-containing roofing materials shall not be dropped or thrown to the ground. The materials shall be carried or passed to the ground by hand or the materials will be lowered to the ground via covered, dust-tight chute, crane, or hoist. While materials that have been removed remain on the roof, the materials shall either be kept wet, placed into an impermeable waste bag, or be wrapped in plastic sheeting. Removed materials shall be lowered to the ground as soon as is practicable, but no later than the end of the work shift.

2.5. Material and Equipment

At all times, the Contractor shall provide at least two (2) complete sets of personal protective equipment, including decontaminating reusable coveralls, as required for entry to and inspection of the abatement area by the Owner's Representative. The Contractor shall provide manufacturer's certificate of compliance for all equipment used.

A. The Contractor shall select respirators from those approved by the National Institute for Occupational Safety and Health (NIOSH). The respiratory equipment shall be suitable for the asbestos exposure level in the work area according to Title 8 CCR 1529. The Contractor shall provide air-purifying respirators (APRs) and disposable HEPA (P100) cartridges as required, with sufficient replacement cartridges.

B. The Contractor shall provide personnel engaged in pre-cleaning, cleanup, handling, and removal of asbestos materials with respiratory protection as indicated in Title 29 CFR 1926.1101 and Title 8 CCR 1529.

C. The Contractor shall provide personnel exposed to asbestos with disposable "non-breathable" or reusable "non-breathable" whole-body outer protective clothing, head coverings, gloves, and foot coverings. The Contactor shall also provide disposable plastic or rubber gloves to protect hands.

D. Workers shall make sleeves secure at the wrists, make foot coverings secure at the ankles, and make clothing secure at the neck by the use of tape.

E. Disposable whole body outer protective clothing shall be disposed of as asbestos-contaminated waste upon exiting from the asbestos-regulated work area. Reusable protective clothing (e.g. boots and respirators) shall be properly decontaminated prior to exiting the regulated work area in accordance with the requirements outlined in Section 2.10.

F. The Contractor shall provide goggles to personnel engaged in asbestos abatement operations when the use of a full-face respirator is not required.

G. The Contractor shall provide warning signs printed in English at all approaches to asbestos control areas, locate signs at such a distance that personnel may read the sign and take the necessary protective steps required before entering the area, and provide labels and affix to all asbestos materials, scrap, waste, debris, and other products contaminated with asbestos.

H. The Contractor shall provide vertical format warning signs conforming to 40 CFR 763, 29 CFR 1926.1101, and Title 8 CCR 1529 minimum 20 by 14 inches displaying the following legend in the lower panel:

Legend	Notation
Danger	1 inch Sans Serif, Gothic, or Block
Asbestos	1 inch Sans Serif, Gothic, or Block
Cancer and Lung Disease Hazard	¼ inch Sans Serif, Gothic, or Block
Authorized Personnel Only	¼ inch Gothic
Respirators and Protective Clothing are Required in this Area	¼ inch Gothic

Spacing between lines shall be at least equal to the height of the upper of any two lines.

I. The Contractor shall provide warning labels conforming to 40 CFR 763, 29 CFR 1926.1101, and Title 8 CCR 1529 of sufficient size to be clearly legible, displaying the following legend:

DANGER
CONTAINS ASBESTOS FIBERS
AVOID CREATING DUST
CANCER AND LUNG DISEASE HAZARD
BREATHING ASBESTOS DUST MAY
CAUSE SERIOUS BODILY HARM

J. The Contractor shall provide a local exhaust system in the asbestos control area in accordance with 40 CFR 763, 29 CFR 1926.1101, and Title 8 CCR 1529 that will provide at least four air changes per hour inside of the negative pressure enclosure. Local exhaust equipment shall be operated 24 hours per day, until the asbestos control area is removed and shall be leak proof to the filter and equipped with HEPA filters. The Contractor shall maintain a minimum pressure differential in the control area of minus 0.02 inch of water column relative to adjacent, unsealed areas. In no case shall the building ventilation system be used as the local exhaust system for the asbestos control area. The local exhaust system shall terminate out of doors and remote from any public access or ventilation system intakes. Local exhaust equipment shall be permitted with SCAQMD.

K. Vacuums shall be leak proof to the filter and equipped with HEPA filters. Filters on vacuums shall conform to 40 CFR 763, 29 CFR 1926.1101, and Title 8 CCR 1529. Do not use power tools to remove ACMs unless the tools are equipped with effective, integral HEPA-filtered exhaust ventilation systems. Remove all residual asbestos from reusable tools prior to storage or reuse.

2.6. Postings

A. The Contractor shall post in the worker decontamination enclosure in the clean room area of a list containing the names and telephone numbers of the Owner, Construction Manager, Abatement Contractor, and Owner's Representative.

B. The Contractor shall post in the worker decontamination enclosure in the clean room area a list of all persons authorized to enter the work area.

C. Additional postings shall include:

- Visitor Entry and Exit Log.
- Employee Daily Sign-in Log.
- Entry and Exit Procedures.
- Emergency Procedures.
- Copies of permits required in Section 1.6 of this document and copies of notifications required in Section 1.7 of this document.

- As required by the Department of Labor.

2.7. Reestablishment of Work Areas

A. Post abatement clearance inspections will be conducted by the Owner's Representative. The inspections will consist of a visual inspection to verify that all asbestos and lead related work was completed as specified.

B. The visual inspection will:

- Verify that visible asbestos debris and/or paint chips are not present in any of the work areas or adjacent to the work areas.
- Verify that all work was completed as specified.
- Survey any collateral damages caused by the Contractor and establish a timetable for repairs, if needed.

2.8. Environmental Monitoring

Monitoring of asbestos abatement activities will be performed by the Owner's Representative.

A. Sampling of concentrations of airborne fibers may be performed by the Owner's Representative in accordance with the protocol defined in 40 CFR 763, 29 CFR 1926.1101 and Title 8 CCR 1529 and as specified herein. Unless otherwise specified, the Owner's Representative will use the protocol specified by NIOSH Method 7400 for sampling and analysis.

B. The fiber counts of clearance air samples shall be less than 0.01 fibers per cubic centimeter. If the test results are higher than specified, the Contractor will be directed to reclean until acceptable levels are met. The cost of any subsequent clearance inspections (including re-sampling costs) will be charged back to the Contractor.

2.9. OSHA Personnel Monitoring

A. Personal air sampling shall be conduced by the Contractor as indicated in 40 CFR 763, 29 CFR 1926.1101, and Title 8 CCR 1529 and governing environmental regulations. Results shall be provided to the Owner's Representative.

2.10. Worker Decontamination Systems

A. The Contractor shall provide a temporary, negative pressure unit with a separate decontamination locker room and clean locker room with a shower in between for personnel

required to wear whole-body protective clothing. Provide two separate lockers for each asbestos worker, one in each locker room.

Keep street clothing and street shoes in the clean locker. HEPA vacuum and remove asbestos-contaminated disposable protective clothing while still wearing respirators at the boundary of the asbestos work area and seal in impermeable bags or containers for disposal. Workers shall not wear work clothing between home and work. Showers shall be located between the decontamination locker room and the clean locker room and all employees shall be required to shower before changing into street clothes. The Contractor shall collect used shower water and filter with Owner's Representative approved water filtration equipment to remove asbestos contamination. The Contractor shall dispose of filters and residue as asbestos waste.

The Contractor shall discharge clean water to the sanitary system and shall dispose of asbestos-contaminated work clothing as asbestos-contaminated waste or properly decontaminate them. Decontamination units shall be physically attached to the asbestos control area. The Contractor shall build both a personnel decontamination unit and an equipment decontamination unit onto and integral with each asbestos control area.

2.11. Clean-up Procedures

A. The Contractor shall maintain surfaces of the work area free of accumulations of dust and debris. The Contractor shall restrict the spread of dust and debris and keep waste from being distributed over the general area. Use HEPA-filtered vacuum cleaners. DO NOT BLOW DOWN THE WORK AREA WITH COMPRESSED AIR. When asbestos removal is complete, all asbestos and lead waste is removed from the work-site, and final cleanup is completed, the Owner's Representative will attest that the area is safe before the signs can be removed.

The Contractor shall dispose of filters as asbestos-contaminated materials. The Contractor shall reestablish mechanical and electrical systems in pre-work condition. The Owner's Representative will visually inspect all surfaces within the enclosure for residual material or accumulated dust or debris. The Contractor shall re-clean all areas showing dust or residual materials. If re-cleaning is required, air sample and establish an acceptable asbestos airborne concentration after re-cleaning.

2.12. Disposal Procedures

A. The Contractor shall collect asbestos-containing waste material (ACWM), asbestos-contaminated water, scrap, debris, bags, containers, equipment, and asbestos-contaminated clothing which may produce airborne concentrations of asbestos fibers and place these items in sealed fiber-proof, waterproof, non-returnable, transparent, leak-tight containers (e.g. double plastic bags 6 mils thick, cartons, drums, or cans). Wastes within the containers must be adequately wet in accordance with 40 CFR 763, 29 CFR 1926.1101, and Title 8 CCR 1529. The Contractor shall affix a warning label in

accordance with Cal/OSHA requirements and a DOT label to each container including the bags or use at least 6-mil thick bags with the approved warnings and DOT labeling preprinted on the bag. The name of the waste generator and the location at which the waste was generated shall be clearly indicated on the outside of each container.

B. The Contractor shall prevent contamination of the transport vehicle. These precautions include lining the vehicle cargo area with plastic sheeting (similar to work area enclosure) and thorough cleaning of the cargo area after transport and unloading of asbestos debris is complete.

C. The Contractor shall dispose of waste asbestos material at an EPA- and/or State-approved asbestos landfill.

D. No ACWM shall be stored on-site except in a leak-tight container. When leak-tight containers are not in use, they shall be kept inside an enclosed area that is not accessible to the general public and shall be locked when not in use.

E. Procedure for hauling and disposal shall comply with 40 CFR 763, 29 CFR 1926.1101, and Title 8 CCR 1529, and regional and local standards. Sealed plastic bags may be dumped from drums into the burial site unless the bags have been broken or damaged. Damaged bags shall remain in the drum and the entire contaminated drum shall be buried. Uncontaminated drums may be recycled. Workers unloading the sealed drums shall wear appropriate respirators and personal protective equipment when handling ACMs at the disposal site.

F. The following materials are presumed to be hazardous.

1. HEPA vacuum debris and filters, dust from air filters and paint dust.
2. Unfiltered liquid waste.
3. Sludge from stripping.
4. Rags, sponges, mops, scrapers and other materials used.

G. It is the responsibility of the Contractor to comply with all Federal, State, regional, and local regulations for ACWM handling, storage, loading, transportation, and disposal. In the case of conflict, the more stringent rule applies. The Contractor will be responsible for obtaining and completing all relevant permits, licenses, manifests, etc. for hazardous waste disposal on behalf of the Owner.

2.13. Alternative Procedures

A. If procedures presented in this Workplan cannot be utilized, the Contractor shall provide the Owner's Representative a written request describing recommended alternatives for approval.

B. Proposed alternative procedures shall be equal to or in excess of procedures they are replacing.

3. LEAD-BASED PAINT (LBP) AND LEAD-BEARING SUBSTANCES (LBS) - REMOVAL/DEMOLITION

This Workplan provides guidelines for removal of all types of LPB and LBS. Based on the findings of the Lead Testing Services Report (Winzler & Kelly, 2010, Appendix A), some or all of these guidelines may be used. The Contractor is responsible to know the applicable regulations governing its work and to use the appropriate guidelines based on the survey results. These general guidelines are provided incase additional suspect LBP is encountered during demolition activities. If suspect materials that have not been previously tested are discovered, the Contractor shall immediately notify the Owner's Representative.

A. Building components on which LBP/LBS is intact may be disposed of as non-hazardous construction debris, according to EPA and Cal-EPA officials.

B. Preparation of the work area is dependent on the type of abatement to be performed, the expected levels of airborne lead concentrations, and is subject to change if the lead concentrations exceed anticipated levels.

C. The Contractor is responsible for the posting of all warning signs and submittals at the entrances and exits to the work area.

D. A two-stage decontamination (decon) area, consisting of a clean room with sufficient wash facilities and a tool room/work area, shall be provided. A "mini-containment" system may be used for abatement consisting of the following, but not limited to:

1. Two layers of 6 mil polyethylene (poly) on floors where removal is needed.
2. Critical barriers around the inside of all windows throughout.
3. "Z" flaps over the entrances to all areas where removal occurs.
4. Pre-Cleaning of interior by HEPA vacuuming and wet wiping with tri-sodium phosphate (TSP) throughout.

E. Sufficient "signage" in the form of pre-printed barrier tape shall be placed around the perimeter of the immediate work area in such a way as to prevent accidental encroachment by unauthorized personnel.

F. For exterior abatement, a double layer of 6 mil poly shall be securely attached to the perimeter of the building, at a minimum distance of 10 feet where possible. This barrier may be attached in increments as work progresses around the building. All poly will be removed

daily and cleaned and disposed of properly before leaving the work site. In the event of winds in excess of 20 mph, work will stop and all debris cleaned up immediately.

G. Lead abatement work may not proceed without the approval of the Owner's Representative after all preparation has been met.

H. Disposal bins of the proper type shall be the responsibility of the Contractor and shall be securely locked at the end of each day. All bins upon being filled shall be removed to the proper landfill as soon as possible.

I. A secure, locked storage area for all volatile chemicals is to be used.

J. All work must be in compliance with this Workplan, current HUD Guidelines, Title 8 CCR, Title 17 CCR, and all Federal, State and Local Regulations.

K. Paint Stabilization (Intacting): All loose and peeling LBP that can be lifted with thumbnail pressure will be removed. Any nails, screws, or other protrusions will be removed. Any surface treated in this manner MUST BE "PAINT READY."

L. Clearance wipe samples will be collected by the Owner's Representative. Clearance samples shall be taken according to HUD LBP Guidelines and analyzed by a qualified laboratory.

M. Wipe sample clearance is as follows:

- Floors 40 $\mu g / ft^2$ (micrograms per square foot)
- Window Sills 250 $\mu g / ft^2$
- Window Troughs 400 $\mu g / ft^2$
- Exterior 400 $\mu g / ft^2$

4. CONTAMINATED SOIL EXCAVATION (IF NEEDED)

Based on the results of a previous subsurface investigation at the site, there are no known areas of contaminated soil at the site. Should previously undiscovered or unknown areas of soil contamination be discovered during demolition activities, The Contractor will notify the Owner and Owner's Representative within 1 working day. The Owner's Representative will perform sampling and analysis as needed to assess the nature and extent of the contamination. If the suspected soil contamination is confirmed by the Owner's Representative to require removal, the Contractor will perform the excavation, stockpiling, loading, transportation, and disposal/recycling of such contaminated soil in accordance with the following requirements.

A. The Contractor shall excavate confirmed areas of soil contamination under the direction of the Owner's Representative.

B. All required grading and other permits shall be obtained by the Contractor from the City of Industry Building officials prior to excavation. All work shall be carried out in compliance with all applicable Federal, State, and local laws and regulations.

C. Excavation of contaminated soil shall be conducted in accordance with the requirements of SCAQMD Rule 1166. The Contractor will responsible for the preparation of a site specific VOC emission mitigation plan for prior submittal to and approval by the SCAQMD. The Contractor will be responsible for all notifications and monitoring required by Rule 116 and for the implementation of the approved mitigation plan, if needed.

D. Inspection notification shall be made to the Owner's Representative a minimum of three working days prior to the start of excavation work.

E. The limits or boundaries of the excavations will be delineated in the field at the time of excavation by the Owner's Representative.

F. The Contractor will allow access to the excavation(s) by the Owner's Representative to collect confirmation soil samples from the walls and floors of the excavation(s) and will provide equipment (backhoe or excavator) to bring sample material to surface for inspection or sampling by the Owner's Representative.

G. The excavation(s) may not be backfilled until receipt of confirmation soil sampling results by Owner's Representative and approval has been received from the Owner's Representative.

H. In the event that confirmation soil sample results are above clean-up criteria established by the Owner's Representative, additional excavation will be necessary and will be performed by the Contractor. Following any additional excavation, additional confirmation samples will be collected by the Owner's Representative.

I. The excavation(s) shall be backfilled in accordance with the requirements of the Project Specifications using borrowed material from the site and/or clean imported soil, as directed by the Agency Engineer. Backfill operations shall be carried out in compliance with applicable Building Code requirements.

J. Contaminated soil that is excavated shall be segregated from other clean soils at the site and stockpiled on 6-mil plastic sheeting, covered with plastic, and secured pending loading. As an alternative, the Contractor may elect to load contaminated soil directly onto trucks for transportation to the disposal/recycling facility.

K. Trucks and excavation and loading equipment used in the excavation, loading, and transportation of contaminated soil will be checked for mud or dirt and will be cleaned prior to

leaving the site to prevent contaminated soil from leaving the site in an uncontrolled manner.

L. The Contractor may utilize chemical data for the contaminated soil provided by the Owner's Representative for disposal or recycling profiling purposes. As an alternative, the Contractor may elect to perform additional sampling and analysis of the soil during or after excavation for profiling purposes. Any additional sampling and testing for disposal or recycling purposes will be done at the Contractor's expense.

M. The Contractor shall provide copies of all disposal manifests and/or bills of lading related to the transportation and disposal/recycling of contaminated soil to the Owner's Representative within 3 working days of transportation of the soil.

5. UNIVERSAL WASTES

Estimated quantities of universal wastes at the site are summarized in Table 2.

A. All fluorescent light tubes shall be removed intact, packaged, and disposed of in accordance with California's Universal Waste Rule, CCR Title 22, Division 4.5, Chapter 23.

B. All light ballasts that are not clearly identified as not containing polychlorinated biphenyls (PCB), i.e. "No-PCB" or "PCB Free," shall be assumed to contain PCBs and shall be removed intact, packaged, and disposed of in accordance with California's Universal Waste Rule, CCR Title 22, Division 4.5, Chapter 23.

C. Mercury switches and any other electrical switching equipment shall be removed intact, packaged, and disposed of in accordance with California's Universal Waste Rule, CCR Title 22, Division 4.5, Chapter 23.

D. All refrigerants shall be evacuated from air conditioners or refrigeration units and disposed of in accordance with applicable EPA and SCAQMD regulations.

E. Batteries from exit signs or other equipment shall be removed intact, packaged, and disposed of in accordance with California's Universal Waste Rule, CCR Title 22, Division 4.5, Chapter 23.

6. MISCELANIOUS WASTES/MATERIALS

The site may contain some miscellaneous waste materials and equipment that may require special handling. In the event that apparent hazardous materials are discovered during demolition activities that are not covered by this Workplan, the Contractor shall notify the Owner's Representative within 1 working day. The Contractor shall provide a plan for the handling and removal of these materials for approval by the Owner's Representative.

7. REFERENCES

Ardent Environmental Group, Inc., 2010a, Asbestos Survey, 111 North Hudson Avenue, City of Industry, California: unpublished report dated August 30.

Ardent Environmental Group, Inc. 2010b, Miscellaneous Hazardous Building Materials Survey, 111 North Hudson Avenue, City of Industry, California: unpublished report dated August 30.

Winzler & Kelly, 2010, Pre-Demolition Lead Testing Services Report, Warehouse/Office Building, 111 North Hudson Avenue, City of Industry, California: unpublished report dated September 3.

Table 1 – Lead-Based Paint and Lead-Bearing Substances

Feature (color/substrate/component)	Location	Quantity	Condition
Yellow/Metal/Post	Exterior	5 Each	Intact
White/Metal/Door	Exterior	5 Each	Intact
Beige/Metal/Access Hatch	Roof	1 Each	Intact
Yellow/Metal/Water Pipe Stripe	Mezzanine	2 SF	Intact
White/Metal/Sliding Fire Door	Warehouse 1	2 Each	Intact
Red/Metal/Column	Warehouse 1	13 Each	Intact
White/Wood/Beams & Ceiling (assumed)	Warehouse 2	8,600 SF	Intact

Room locations are shown in Figures included with attached Lead Testing Services Report (Appendix A).
SF – square feet
Intact – Paint or substance generally in good condition.

Table 2 – Universal Wastes/Miscellaneous Materials

Feature	Possible Hazardous Component	Location	Total Estimated Quantity
Fluorescent Light Ballasts	PCBs	Throughout Office and Warehouse	72
Fluorescent Light Tubes	Mercury	Throughout Office and Warehouse	158 – 8 ft long 120 – 4 ft long
Mercury Vapor Lamps	Mercury	Warehouse	26
Thermostat Switches	Liquid mercury and/or lead batteries	Throughout Office	4 – Mercury 2 – Battery
Air Conditioning Units	Freon or CFC gases	Roof	5
PCB – polychlorinated biphenyls CFC – Chlorofluorocarbons			

APPENDIX A

HAZARDOUS BUILDING MATERIAL SURVEY REPORTS

ARDENT
ENVIRONMENTAL
GROUP, INC.

ASBESTOS SURVEY
111 NORTH HUDSON AVENUE
CITY OF INDUSTRY, CALIFORNIA

PREPARED FOR
Industry Urban-Development Agency
15625 East Stafford Street, Suite 200
City of Industry, California 91744

PREPARED BY
Ardent Environmental Group, Inc.
1141 Pomona Road, Suite E
Corona, California 92882

August 30, 2010
Project No. 100148003

Phone: (951) 736-5334
Fax: (951) 736-7560

1141 Pomona Road, Suite E
Corona, California 92882

ARDENT
ENVIRONMENTAL
GROUP, INC.

August 30, 2010
Project No. 100148003

Mr. Kevin Radecki
Industry Urban-Development Agency
15625 East Stafford Street, Suite 200
City of Industry, California 91744

Subject: Asbestos Survey
111 North Hudson Avenue
City of Industry, California

Dear Mr. Radecki:

In accordance with your authorization, Ardent Environmental Group, Inc. has completed a pre-demolition asbestos survey of the building located at 111 North Hudson Avenue, City of Industry, California.

Ardent Environmental Group, Inc. appreciates the opportunity to be of service on this project.

Sincerely,
Ardent Environmental Group, Inc.

Craig A. Metheny, R.E.A., C.A.C.
Principal Geologist

Paul A. Roberts, P.G., R.E.A I/II
Principal Geologist

CM/PAR/paw

Distribution: (1)Addressee

Phone: (951) 736-5334
Fax: (951) 736-7560

1141 Pomona Road, Suite E
Corona, California 92882

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1. INTRODUCTION

Ardent Environmental Group, Inc. (Ardent) performed a pre-demolition asbestos survey of the building located at 111 North Hudson Avenue, City of Industry, California (site). This report has been prepared for Industry Urban-Development Agency (Agency) in general accordance with contract number 4-ARDENT 10-01 MP 08-13.

2. PURPOSE

The purpose of this survey was to identify the presence, quantity, and condition of asbestos-containing materials (ACMs) and asbestos-containing construction materials (ACCMs) in the site building to satisfy the pre-demolition asbestos survey requirements of the U.S. Environmental Protection Agency (EPA) and the South Coast Air Quality Management District (SCAQMD) and to provide information for the preparation of a hazardous building materials removal work plan.

3. BUILDING LOCATION AND DESCRIPTION

The site is located at 111 North Hudson Avenue in the City of Industry, Los Angeles County, California (Figure 1). The site comprises approximately 1.75-acres and has been assigned the Tax Assessor's Parcel Number (APN) 8208-024-027.

The site is a square-shaped parcel occupied by one approximately 39,600-square foot industrial/warehouse building. At the time of this report the site was unoccupied. The site building was constructed in 1967/1968 and contains an approximately 7,400 square foot office area, including a 1,400 square foot mezzanine, and an approximately 32,000 square foot warehouse area. The site building is of concrete tilt-up construction with wood or metal framed gypsum board interior walls. Floors are finished with concrete in the warehouse area, with carpet in the office areas, and with sheet vinyl flooring or vinyl floor tiles in restrooms. Ceilings in the office area are finished with suspended acoustic ceiling panels.

4. SCOPE OF SERVICES

The scope of services performed by Ardent consisted of the following:

- A site reconnaissance, which included identifying and sampling homogeneous areas of suspect ACMs in the buildings, including exterior and roofing materials. Ardent collected 49 bulk samples for laboratory analysis. The samples were collected by a California Certified Asbestos Consultant in accordance with EPA and California Department of Health Services guidelines.

- Bulk samples were analyzed for asbestos content by polarized light microscopy (PLM) in accordance with EPA method 600/R-93/116 by an NVLAP accredited laboratory. Selected samples were further analyzed by the EPA Point Count 1000 method.

- Preparation of this report.

5. ASBESTOS SURVEY METHODS

The asbestos survey was performed from August 9, 2010 through August 13, 2010. The survey was performed by Craig Metheny, a State Certified Asbestos Consultant. The asbestos survey was performed in general accordance with the standard procedures recommended by the U.S. Environmental Protection Agency (EPA) and the requirements of the State of California Division of Occupational Safety and Health (DOSH). The sampling strategy involved the collection of a representative number of samples of friable and/or nonfriable materials judged to potentially contain asbestos (suspect ACMs). Friable materials are defined by the EPA as those materials that can be crumbled, pulverized, or reduced to powder by hand pressure when dry. Nonfriable materials can become friable when disturbed through work practices and or handling, such as cutting, drilling, grinding, sanding, and handling during removal.

Suspect ACMs and homogeneous areas were identified and bulk samples were collected and handled using the following general procedures:

1. The location, type, quantity, and condition of suspect ACMs was identified and tabulated.

2. The suspect ACMs were divided into homogeneous materials. A homogeneous material is defined as being uniform in texture, color, and date of application.

3. A sampling scheme including the number and locations of samples was developed based on the location and quantity of the identified homogeneous materials.

4. Bulk samples were collected by trained and certified personnel using an appropriate sampling tool, wet methods, and a leak-tight container. Each sample was recorded on a sampling log.
5. Decontamination of sampling tools.
6. A chain-of-custody record was maintained fro the samples from collection to delivery to the laboratory.

A listing of all homogeneous areas (HAs) of suspect ACMs is provided in Table 1. A total of 49 bulk samples were collected from the site buildings. Bulk sample locations are shown in Figures 3 and 4. In addition, two large rolling fire doors in the warehouse area of the site building were inspected for possible ACMs. The fire doors were found to be constructed of wood core and sheet metal exterior. Therefore, samples were not collected of the fire door materials.

6. ANALYTICAL METHODS AND RESULTS

The bulk samples were submitted to EMLab P&K, an NVLAP accredited laboratory, for analysis of asbestos content. The samples were analyzed by polarized light microscopy (PLM) in accordance with EPA method 600/R-93/116. Six samples (samples 1, 2, 4, 5, 6, & 46) which showed a trace (<1 percent) amount of asbestos by the PLM analysis were further analyzed by the EPA Point Count 1000 method.

The PLM method used has a detection limit of 1 percent. Materials reported to contain 1 percent or more are considered and asbestos-containing materials (ACM). A material reported to have a trace percentage of asbestos (present at less than 1 percent) should be treated as an asbestos-containing construction material (ACCM, greater than 0.1 percent asbestos) unless analyzed by other methods, such as the Point Count method. The Point Count 1000 method has a detection limit of 0.1 percent.

The laboratory results are summarized in Table 2. As shown in Table 2, no suspect materials that were sampled and analyzed contained greater than 0.1 percent asbestos. The laboratory reports are presented as Attachment A.

7. DISCUSSION OF RESULTS AND CONCLUSIONS

A total of 49 samples were collected by Ardent and analyzed by the laboratory for asbestos content. Based on the inspection and laboratory results, no materials were found to contain detectable concentrations of 1 percent or greater of asbestos (ACMs) or less than 1 percent but greater than 0.1 percent asbestos (ACCMs).

Detected ACMs (1% or greater asbestos content)

- None.

Detected ACCMs (less than 1% and greater than 0.1% asbestos content)

- None.

8. RECOMMENDATIONS

The results of the asbestos survey indicate that ACMs and ACCMs are not present at the site building. Ardent makes no recommendations for further action related to asbestos-containing materials.

9. QUALIFICATIONS & CERTIFICATIONS

Ardent team members and subcontractors are qualified or are properly licensed or certified to do the work described herein. Copies of relevant certifications are provided as Attachment B.

10. LIMITATIONS

The services provided and the information obtained is relevant for the date the services were performed and valid as of the date of this letter. This letter is conclusive with respect to the information obtained. No warranty, express or implied, is intended regarding the results of this report and any subsequent reports, correspondence, or consultation. The information obtained is not intended to address potential impacts related to sources other than those specified herein. The findings and conclusions presented in this letter are relevant to the portions of the structure investigated.

The estimated quantities of ACMs and/or ACCMs provided in this report are for discussion and management purposes only. The actual quantities may vary and should be verified by the asbestos abatement contractor prior to abatement.

The findings and conclusions as presented in this letter are based on the services provided, and should not be interpreted as a warranty that asbestos does not exist elsewhere in the subject structure. All ACMs in the site building may not have been identified by this survey due to inaccessible or hidden building features. Furthermore, although samples were collected from each identified homogeneous area, the homogeneity of materials cannot be guaranteed. Therefore, additional sampling and testing may be necessary to provide a higher degree of confidence regarding the presence of asbestos in the building.

The services summarized herein were performed in accordance with the local standard of care and state-of-the industry practices in the geographic region at the time the services were rendered. Because the most comprehensive survey may not detect all asbestos in a building, Ardent cannot act as an insurer or certify that the site building is free of asbestos.

TABLE 1 - HOMOGENEOUS AREAS (HA) OF SUSPECT ASBESTOS-CONTAINING MATERIALS (ACMs)

HA #	Description	Location(s)
A	Drywall and Joint Compound	Most rooms in ground floor office area
B	Brown Cove Base Mastic	Most rooms in ground floor office area except restrooms.
C	Ceiling Tile with Random Stipple Pattern	Rooms 1, 12, 13, 14, & 15.
D	Ceiling Tile with Fissure Pattern	Rooms 2, 3, 4, 5, 6, 7, 10 & 11.
E	White Cove Base Mastic	All rooms in ground floor office area except restrooms.
F	Yellow Carpet Mastic	All rooms in ground floor office area except restrooms.
G	Gray & White Sheet Flooring with Brown Mastic	Rooms 8, 9 & 17 (restrooms)
H	Gray 12x12 Vinyl Floor Tile with Yellow Mastic	Room 16 (restroom)
I	Drywall and Joint Compound	Room 24 (mezzenine)
J	Yellow-Brown Carpet Mastic	Room 24 (mezzenine)
K	Drywall and Joint Compound with Texture Coat	Rooms 15 & 18
L	Roof Core	Roof Section A
M	Roof Core	Roof Section B
N	Silver Roof Mastic	Roof Sections A & B
O	Light Gray Roof Mastic	Roof Section A
P	White Roof Mastic	Roof Sections A & B
Q	Large Fire Doors	Warehouse
R	White Mirror Mastic	Rooms 8, 9, 16 & 17
S	Yellow-Brown Wainscot Mastic	Rooms 8, 9, 16 & 17
T	Gray Roof Mastic	Roof Sections A & B
U	White Roof Mastic	Roof Sections A & B

Note: Locations of room numbers and roof sections are shown in Figures 3 and 4.

TABLE 2 - ASBESTOS SAMPLE RESULTS

Sample Number	HA Number	Type of Material	Location	Asbestos Content
1	A	Drywall & Joint Compound	Room 6 - Office	**Joint Compound = <1% Chrysotile** Drywall = ND Composite = ND<0.1%
2	A	Drywall & Joint Compound	Room 3 - Office	**Joint Compound = <1% Chrysotile** Drywall = ND Composite = ND<0.1%
3	A	Drywall & Joint Compound	Room 11 - Office	Joint Compound = ND Drywall = ND
4	A	Drywall & Joint Compound	Room 8 - Restroom	**Joint Compound = <1% Chrysotile** Drywall = ND Composite = ND<0.1%
5	A	Drywall & Joint Compound	Room 20 - Office	**Joint Compound = <1% Chrysotile** Drywall = ND Composite = ND<0.1%
6	K	Drywall & Joint Compound with Texture Coat	Room 15 - Office	**Joint Compound = <1% Chrysotile** Drywall = ND Composite = ND<0.1% Texture Coat = ND
7	K	Drywall & Joint Compound with Texture Coat	Room 15 - Office	Joint Compound = ND Drywall = ND Texture Coat = ND
8	K	Drywall & Joint Compound with Texture Coat	Room 18 - Office	Joint Compound = ND Drywall = ND
9	B	Brown and Tan Cove Base Mastic	Room 6 - Office	Brown Mastic = ND Tan Mastic = ND
10	E	White Cove Base Mastic	Room 6 - Office	ND
11	E	White Cove Base Mastic	Room 7 - Lobby	ND
12	E	White Cove Base Mastic	Room 1 - Office	ND
13	B	Brown Cove Base Mastic	Room 12 - Office	ND
14	L	Layered Roof Core	Roof Section A	Cap Sheet = ND Felt Layer 1 = ND Felt Layer 2 = ND Felt Layer 3 = ND
15	L	Layered Roof Core	Roof Section A	Cap Sheet = ND Felt Layer 1 = ND Felt Layer 2 = ND Felt Layer 3 = ND
16	M	Layered Roof Core	Roof Section B	Cap Sheet = ND Felt Layer 1 = ND Felt Layer 2 = ND Felt Layer 3 = ND

TABLE 2 - ASBESTOS SAMPLE RESULTS

Sample Number	HA Number	Type of Material	Location	Asbestos Content
17	M	Layered Roof Core	Roof Section B	Cap Sheet = ND Felt Layer 1 = ND Felt Layer 2 = ND Felt Layer 3 = ND
18	N	Silver Roof Mastic	Roof Section A - AC Unit	ND
19	N	Silver Roof Mastic	Roof Section A - Parapet Wall	ND
20	N	Silver Roof Mastic	Roof Section A/B - Divider Wall	ND
21	T	Gray Roof Mastic	Roof Section B - Small Patches	ND
22	N	Silver Roof Mastic	Roof Section A - Skylight	ND
23	P	White Roof Mastic	Roof Section A - Skylight	ND
24	P	White Roof Mastic	Roof Section A - Vent	ND
25	U	White Roof Mastic with Membrane	Roof Section A - Patch	White Mastic = ND Felt Layer = ND
26	U	White Roof Mastic with Membrane	Roof Section B - Patch	White Mastic = ND Felt Layer = ND
27	O	Light Gray Roof Mastic	Roof Section A - AC Unit	Mastic = ND Felt Layer = ND
28	O	Light Gray Roof Mastic	Roof Section A - Skylight	Mastic = ND Felt Layer = ND
29	T	Gray Roof Mastic	Roof Section A - AC Unit	ND
30	O	Light Gray Roof Mastic	Roof Section A - Parapet Wall	ND
31	D	Ceiling Tile Fissure Pattern	Room 6 - Office	ND
32	D	Ceiling Tile Fissure Pattern	Room 11 - Office	ND
33	C	Ceiling Tile Random Pattern	Room 1 - Office	ND
34	C	Ceiling Tile Random Pattern	Room 12 - Office	ND
35	F	Yellow Carpet Mastic	Room 7 - Lobby	ND
36	F	Yellow Carpet Mastic	Room 14 - Office	ND
37	F	Yellow Carpet Mastic	Room 1 - Office	ND
38	G	Gray & White Sheet Flooring w/Brown Mastic	Room 8 - Restroom	Mastic = ND Leveling Compound = ND Flooring = ND
39	G	Gray & White Sheet Flooring w/Brown Mastic	Room 17 - Restroom	Mastic = ND Leveling Compound = ND Flooring = ND
40	H	Gray 12x12 Vinyl Floor Tile w/Gray Filler	Room 16 - Restroom	Mastic = ND Leveling Compound = ND Flooring = ND
41	H	Gray 12x12 Vinyl Floor Tile w/Yellow Mastic	Room 16 - Restroom	Mastic = ND Leveling Compound = ND Flooring = ND
42	R	White Mirror Mastic	Room 8 - Restroom	ND
43	R	White Mirror Mastic	Room 17 - Restroom	ND
44	S	Yellow-Brown Wainscot Mastic	Room 8 - Restroom	ND
45	S	Yellow-Brown Wainscot Mastic	Room 16 - Restroom	ND

TABLE 2 - ASBESTOS SAMPLE RESULTS

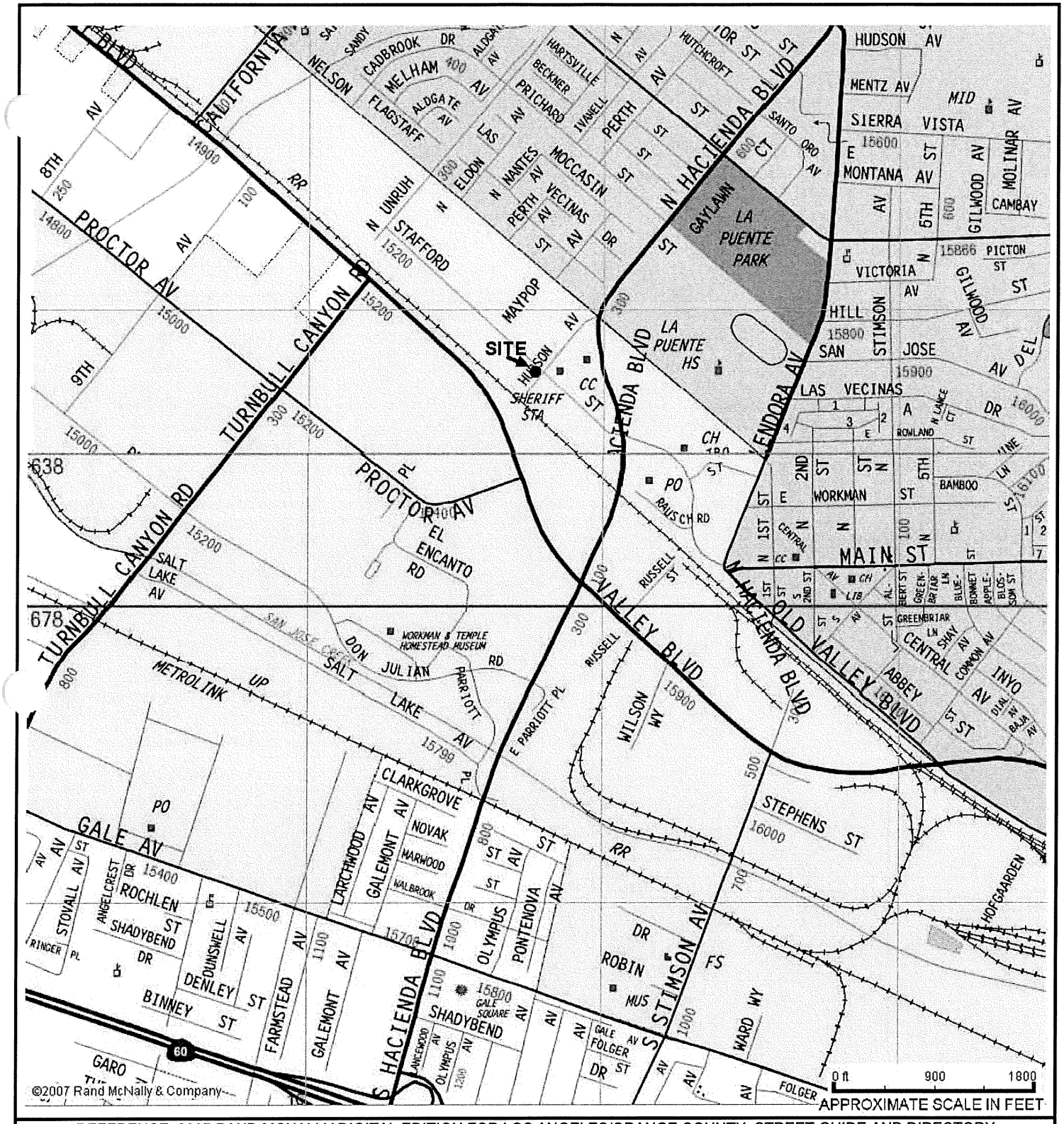
Sample Number	HA Number	Type of Material	Location	Asbestos Content
46	I	Drywall & Joint Compound	Room 24 - Mezzenine	**Joint Compound = <1% Chrysotile** Drywall = ND Composite = ND<0.1%
47	I	Drywall & Joint Compound	Room 24 - Mezzenine	Joint Compound = ND Drywall = ND
48	J	Yellow-Brown Carpet Mastic	Room 24 - Mezzenine	ND
49	J	Yellow-Brown Carpet Mastic	Room 24 - Mezzenine	ND

Notes:

HA = Homogeneous Area (see Table 1)

ND = Not Detected

Sample, room number and roof section locations are shown in Figures 3 & 4.

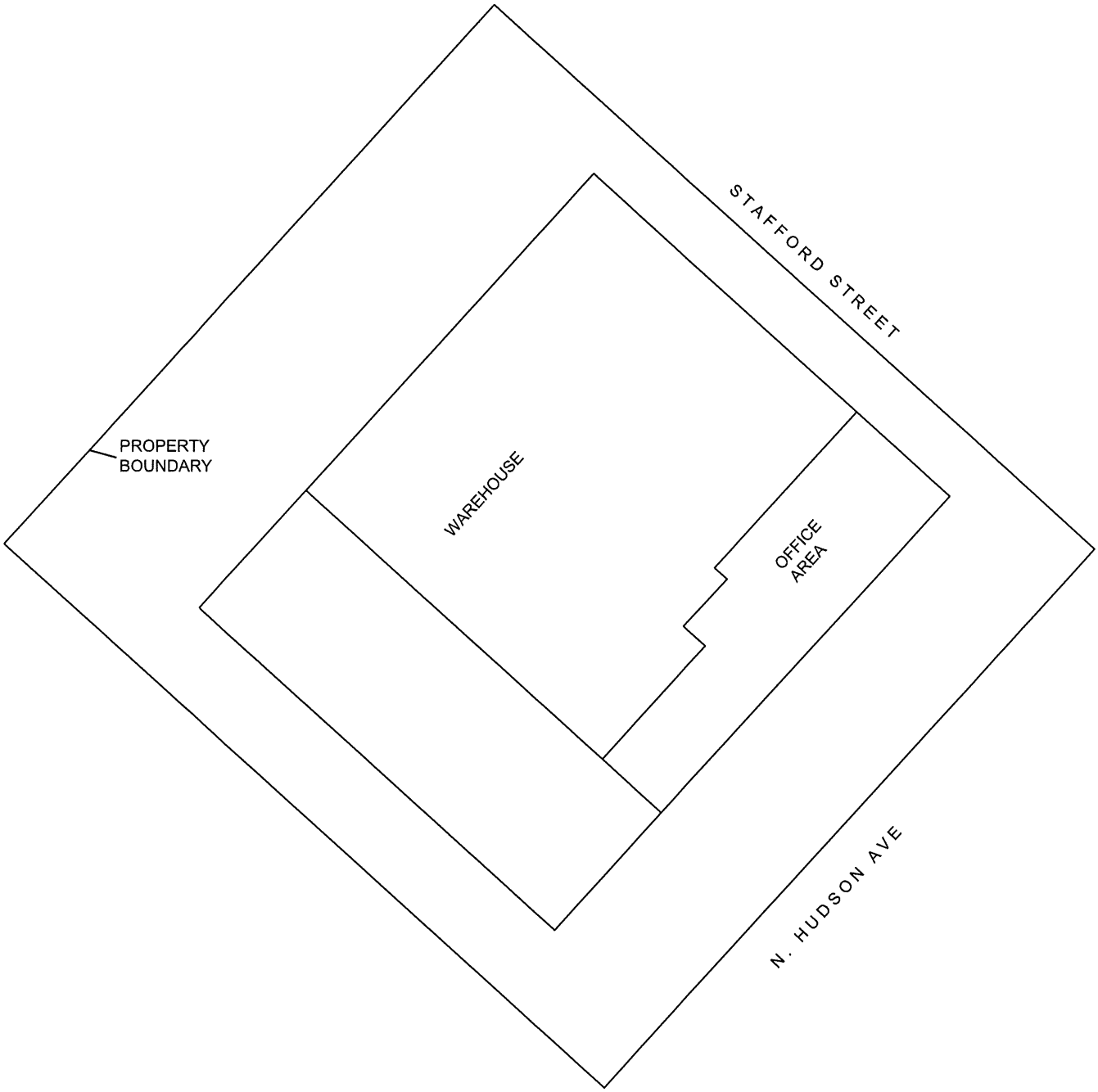


REFERENCE: 2007 RAND MCNALLY DIGITAL EDITION FOR LOS ANGELES/ORANGE COUNTY, STREET GUIDE AND DIRECTORY

N

NOTE: ALL DIMENSIONS, DIRECTIONS, AND LOCATIONS ARE APPROXIMATE

ARDENT ENVIRONMENTAL GROUP, INC.	PROJECT NO. 100148003	SITE LOCATION MAP	FIGURE
	DATE 8/10	111 NORTH HUDSON AVENUE CITY OF INDUSTRY, CALIFORNIA	1



N

APPROXIMATE SCALE IN FEET

0 30 60

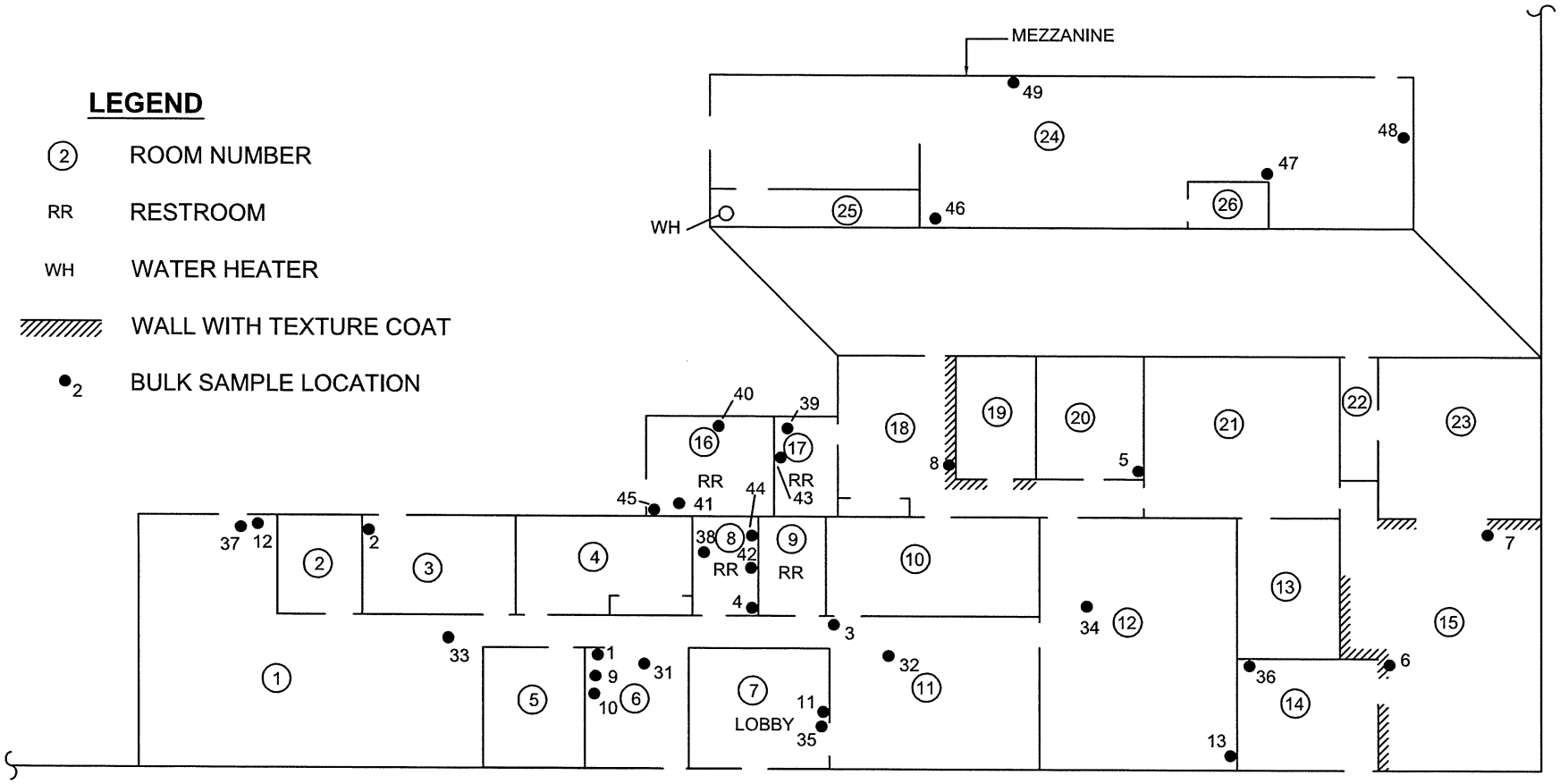
NOTE: ALL DIMENSIONS, DIRECTIONS AND LOCATIONS ARE APPROXIMATE.

ARDENT ENVIRONMENTAL GROUP, INC	PROJECT NO. 100148003	**SITE PLAN**	FIGURE
	DATE 8/10	111 NORTH HUDSON AVENUE CITY OF INDUSTRY, CALIFORNIA	**2**

J.XX

LEGEND

(2)	ROOM NUMBER
RR	RESTROOM
WH	WATER HEATER
//////	WALL WITH TEXTURE COAT
•2	BULK SAMPLE LOCATION



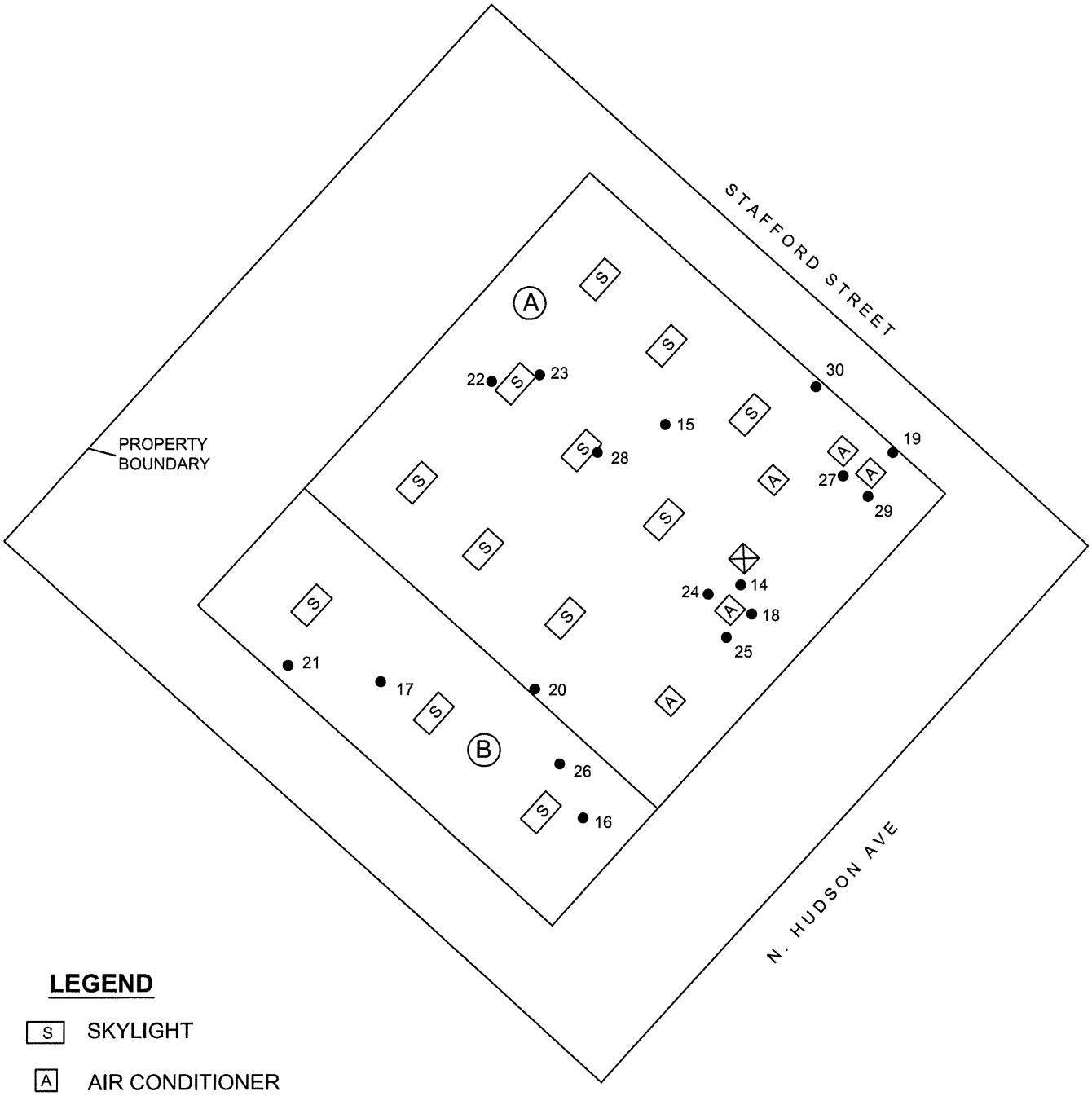
APPROXIMATE SCALE IN FEET

0 10 20

NOTE: ALL DIMENSIONS, DIRECTIONS AND LOCATIONS ARE APPROXIMATE.

XX.DWG

ARDENT ENVIRONMENTAL GROUP, INC.	PROJECT NO. 100148003	**BULK SAMPLE LOCATIONS - OFFICE AREA**	FIGURE
	DATE 8/10	111 NORTH HUDSON AVENUE CITY OF INDUSTRY, CALIFORNIA	3



LEGEND

- S — SKYLIGHT
- A — AIR CONDITIONER
- ⊠ — ROOF HATCH
- ●2 — BULK SAMPLE LOCATION
- Ⓐ — ROOF SECTION

N

APPROXIMATE SCALE IN FEET

0 30 60

NOTE: ALL DIMENSIONS, DIRECTIONS AND LOCATIONS ARE APPROXIMATE.

ARDENT ENVIRONMENTAL GROUP, INC.	PROJECT NO. 100148003	BULK SAMPLE LOCATIONS - ROOF	FIGURE
	DATE 8/10	111 NORTH HUDSON AVENUE CITY OF INDUSTRY, CALIFORNIA	4

APPENDIX A

LABORATORY REPORTS

EMLab P&K

Report for:

Mr. Craig Metheny
Ardent Environmental Group, Inc.
1141 Pomona Rd.
Ste E
Corona, CA 92882

Regarding: Project: 100148003; 111 N. Hudson
EML ID: 691792

Approved by:

Lab Manager
Dr. Kamashwaran Ramanathan

Dates of Analysis:
Asbestos-EPA Method 600/R-93/116: 08-20-2010

Service SOPs: Asbestos-EPA Method 600/R-93/116 (EPA-600/M4-82-020 (SOP 01264))

For clarity, we report the number of significant digits as calculated; but, due to the nature of this type of biological data, the number of significant digits that is used for interpretation should generally be one or two. All samples were received in acceptable condition unless noted in the Report Comments portion in the body of the report. Due to the nature of the analyses performed, field blank corrections of results is not a standard practice. The results relate only to the items tested.

EMLab P&K ("the Company") shall have no liability to the client or the client's customer with respect to decisions or recommendations made, actions taken or courses of conduct implemented by either the client or the client's customer as a result of or based upon the Test Results. In no event shall the Company be liable to the client with respect to the Test Results except for the Company's own willful misconduct or gross negligence nor shall the Company be liable for incidental or consequential damages or lost profits or revenues to the fullest extent such liability may be disclaimed by law, even if the Company has been advised of the possibility of such damages, lost profits or lost revenues. In no event shall the Company's liability with respect to the Test Results exceed the amount paid to the Company by the client therefor.

Document Number: 200091 - Revision Number: 5

EMLab P&K
1150 Bayhill Drive, Suite 100, San Bruno, CA 94066
(866) 888-6653 Fax (650) 829-5852 www.emlab.com

Client: Ardent Environmental Group, Inc.
C/O: Mr. Craig Metheny
Re: 100148003; 111 N. Hudson

Date of Sampling: 08-13-2010
Date of Receipt: 08-17-2010
Date of Report: 08-20-2010

ASBESTOS PLM REPORT: EPA-600/M4-82-020 & EPA METHOD 600/R-93-116

Total Samples Submitted:	49
Total Samples Analysed:	49
Total Samples with Layer Asbestos Content > 1%:	0

Location: 1, Drywall/Joint compound

Lab ID-Version‡: 3067075-1

Sample Layers	Asbestos Content
White Drywall	ND
Beige Joint Compound with Paint	< 1% Chrysotile
White Non-Fibrous Material with Paint	ND
Composite Asbestos Fibrous Content:	< 1% Asbestos
Composite Non-Asbestos Fibrous Content:	5% Cellulose
Sample Composite Homogeneity:	Good

Comments: Composite asbestos content provided is only for Drywall/Joint compound. Composite content provided does not follow the guidelines set forth by NVLAP. This analysis was performed by following the NESHAP guidelines.

Location: 2, Drywall/Joint compound

Lab ID-Version‡: 3067076-1

Sample Layers	Asbestos Content
White Drywall	ND
Beige Joint Compound with Paint	< 1% Chrysotile
Beige Non-Fibrous Material with Paint	< 1% Chrysotile
Tape	ND
Composite Asbestos Fibrous Content:	< 1% Asbestos
Composite Non-Asbestos Fibrous Content:	5% Cellulose
Sample Composite Homogeneity:	Good

Comments: Composite asbestos content provided is only for Drywall/Joint compound. Composite content provided does not follow the guidelines set forth by NVLAP. This analysis was performed by following the NESHAP guidelines.

Location: 3, Drywall/Joint compound

Lab ID-Version‡: 3067077-1

Sample Layers	Asbestos Content
White Drywall	ND
White Non-Fibrous Material with Paint	ND
Composite Non-Asbestos Fibrous Content:	2% Cellulose 2% Glass Fibers
Sample Composite Homogeneity:	Good

The results relate only to the items tested. Interpretation is left to the company and/or persons who conducted the field work. The test report shall not be reproduced except in full, without written approval of the laboratory. The report must not be used by the client to claim product certification, approval, or endorsement by NVLAP, NIST, or any agency of the federal government.

All samples were received in acceptable condition unless otherwise noted. EMLab P&K reserves the right to dispose of all samples after a period of thirty (30) days, according to all state and federal guidelines, unless otherwise specified.

Inhomogeneous samples are separated into homogeneous subsamples and analyzed individually. ND means no fibers were detected. When detected, the minimum detection and reporting limit is less than 1% unless point counting is performed.
‡ A "Version" indicated by -"x" after the Lab ID# with a value greater than 1 indicates a sample with amended data. The revision number is reflected by the value of "x".

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Client: Ardent Environmental Group, Inc.
C/O: Mr. Craig Metheny
Re: 100148003; 111 N. Hudson

Date of Sampling: 08-13-2010
Date of Receipt: 08-17-2010
Date of Report: 08-20-2010

ASBESTOS PLM REPORT: EPA-600/M4-82-020 & EPA METHOD 600/R-93-116

Location: 4, Drywall/Joint compound

Lab ID-Version‡: 3067078-1

Sample Layers	Asbestos Content
White Drywall	ND
Beige Joint Compound with Paint	< 1% Chrysotile
White Non-Fibrous Material with Paint	ND
Composite Asbestos Fibrous Content:	< 1% Asbestos
Composite Non-Asbestos Fibrous Content:	5% Cellulose
Sample Composite Homogeneity:	Good

Comments: Composite asbestos content provided is only for Drywall/Joint compound. Composite content provided does not follow the guidelines set forth by NVLAP. This analysis was performed by following the NESHAP guidelines.

Location: 5, Drywall/Joint compound

Lab ID-Version‡: 3067079-1

Sample Layers	Asbestos Content
White Drywall	ND
Beige Joint Compound with Paint	< 1% Chrysotile
Composite Asbestos Fibrous Content:	< 1% Asbestos
Composite Non-Asbestos Fibrous Content:	3% Cellulose
Sample Composite Homogeneity:	Good

Comments: Composite content provided does not follow the guidelines set forth by NVLAP. This analysis was performed by following the NESHAP guidelines.

Location: 6, Drywall/Joint compound with texture

Lab ID-Version‡: 3067080-1

Sample Layers	Asbestos Content
White Drywall	ND
Beige Joint Compound with Paint	< 1% Chrysotile
White Non-Fibrous Material with Paint	ND
Composite Asbestos Fibrous Content:	< 1% Asbestos
Composite Non-Asbestos Fibrous Content:	5% Cellulose
Sample Composite Homogeneity:	Good

Comments: Composite asbestos content provided is only for Drywall/Joint compound. Composite content provided does not follow the guidelines set forth by NVLAP. This analysis was performed by following the NESHAP guidelines.

Location: 7, Drywall/Joint compound with texture cont

Lab ID-Version‡: 3067081-1

Sample Layers	Asbestos Content
White Drywall	ND
White Joint Compound with Paint	ND
White Non-Fibrous Material with Paint	ND
Composite Non-Asbestos Fibrous Content:	3% Cellulose
Sample Composite Homogeneity:	Good

The results relate only to the items tested. Interpretation is left to the company and/or persons who conducted the field work. The test report shall not be reproduced except in full, without written approval of the laboratory. The report must not be used by the client to claim product certification, approval, or endorsement by NVLAP, NIST, or any agency of the federal government.

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Client: Ardent Environmental Group, Inc.
C/O: Mr. Craig Metheny
Re: 100148003; 111 N. Hudson

Date of Sampling: 08-13-2010
Date of Receipt: 08-17-2010
Date of Report: 08-20-2010

ASBESTOS PLM REPORT: EPA-600/M4-82-020 & EPA METHOD 600/R-93-116

Location: 8, Drywall/Joint compound with texture cont Lab ID-Version‡: 3067082-1

Sample Layers	Asbestos Content
White Drywall	ND
White Joint Compound with Paint	ND
Composite Non-Asbestos Fibrous Content:	3% Glass Fibers
Sample Composite Homogeneity:	Good

Location: 9, Brown cove base mastic Lab ID-Version‡: 3067083-1

Sample Layers	Asbestos Content
Dark Brown Mastic	ND
Tan Mastic	ND
Black Baseboard	ND
Sample Composite Homogeneity:	Good

Location: 10, White cove base mastic Lab ID-Version‡: 3067084-1

Sample Layers	Asbestos Content
Beige Mastic	ND
Sample Composite Homogeneity:	Good

Location: 11, White cove base mastic Lab ID-Version‡: 3067085-1

Sample Layers	Asbestos Content
Tan Mastic	ND
Black Baseboard	ND
Sample Composite Homogeneity:	Good

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C/O: Mr. Craig Metheny
Re: 100148003; 111 N. Hudson

Date of Sampling: 08-13-2010
Date of Receipt: 08-17-2010
Date of Report: 08-20-2010

ASBESTOS PLM REPORT: EPA-600/M4-82-020 & EPA METHOD 600/R-93-116

Location: 12, White cove base mastic

Lab ID-Version‡: 3067086-1

Sample Layers	Asbestos Content
Tan Mastic	ND
Black Baseboard	ND
Sample Composite Homogeneity:	Good

Location: 13, Brown cove base mastic

Lab ID-Version‡: 3067087-1

Sample Layers	Asbestos Content
Dark Brown Mastic	ND
Black Baseboard	ND
Composite Non-Asbestos Fibrous Content:	< 1% Wollastonite
Sample Composite Homogeneity:	Good

Location: 14, Roof core

Lab ID-Version‡: 3067088-1

Sample Layers	Asbestos Content
Black Roofing Tar and Felt	ND
Black Roofing Tar and Felt	ND
Black Roofing Tar and Felt	ND
Black Roofing Shingle with Gray Stones	ND
Composite Non-Asbestos Fibrous Content:	45% Glass Fibers
Sample Composite Homogeneity:	Good

Location: 15, Roof core

Lab ID-Version‡: 3067089-1

Sample Layers	Asbestos Content
Black Roofing Tar and Felt	ND
Black Roofing Tar and Felt	ND
Black Roofing Tar and Felt	ND
Black Roofing Shingle with Gray Stones	ND
Composite Non-Asbestos Fibrous Content:	45% Glass Fibers
Sample Composite Homogeneity:	Good

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Date of Sampling: 08-13-2010
Date of Receipt: 08-17-2010
Date of Report: 08-20-2010

ASBESTOS PLM REPORT: EPA-600/M4-82-020 & EPA METHOD 600/R-93-116

Location: 16, Roof core

Lab ID-Version‡: 3067090-1

Sample Layers	Asbestos Content
Black Roofing Tar and Felt	ND
Black Roofing Tar and Felt	ND
Black Roofing Tar and Felt	ND
Black Roofing Shingle with Gray Stones	ND
Composite Non-Asbestos Fibrous Content:	45% Glass Fibers
Sample Composite Homogeneity:	Good

Location: 17, Roof core

Lab ID-Version‡: 3067091-1

Sample Layers	Asbestos Content
Black Roofing Tar and Felt	ND
Black Roofing Tar and Felt	ND
Black Roofing Tar and Felt	ND
Black Roofing Shingle with Gray Stones	ND
Composite Non-Asbestos Fibrous Content:	45% Glass Fibers
Sample Composite Homogeneity:	Good

Location: 18, Silver roof mastic

Lab ID-Version‡: 3067092-1

Sample Layers	Asbestos Content
Silver Mastic	ND
Sample Composite Homogeneity:	Good

Location: 19, Silver roof mastic

Lab ID-Version‡: 3067093-1

Sample Layers	Asbestos Content
Silver Mastic	ND
Sample Composite Homogeneity:	Good

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Re: 100148003; 111 N. Hudson

Date of Sampling: 08-13-2010
Date of Receipt: 08-17-2010
Date of Report: 08-20-2010

ASBESTOS PLM REPORT: EPA-600/M4-82-020 & EPA METHOD 600/R-93-116

Location: 20, Silver roof mastic Lab ID-Version‡: 3067094-1

Sample Layers	Asbestos Content
Silver Mastic	ND
Sample Composite Homogeneity:	Good

Location: 21, Gray roof mastic Lab ID-Version‡: 3067095-1

Sample Layers	Asbestos Content
Gray Roofing Mastic	ND
Composite Non-Asbestos Fibrous Content:	10% Cellulose
Sample Composite Homogeneity:	Good

Location: 22, Silver roof mastic Lab ID-Version‡: 3067096-1

Sample Layers	Asbestos Content
Silver Roofing Mastic	ND
Composite Non-Asbestos Fibrous Content:	20% Cellulose
Sample Composite Homogeneity:	Good

Location: 23, White roof mastic Lab ID-Version‡: 3067097-1

Sample Layers	Asbestos Content
Black Roofing Mastic with White Coating	ND
Composite Non-Asbestos Fibrous Content:	10% Cellulose
Sample Composite Homogeneity:	Good

Location: 24, White roof mastic Lab ID-Version‡: 3067098-1

Sample Layers	Asbestos Content
Black Roofing Mastic with White Coating	ND
Composite Non-Asbestos Fibrous Content:	10% Cellulose
Sample Composite Homogeneity:	Good

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‡ A "Version" indicated by -"x" after the Lab ID# with a value greater than 1 indicates a sample with amended data. The revision number is reflected by the value of "x".

EMLab P&K
1150 Bayhill Drive, Suite 100, San Bruno, CA 94066
(866) 888-6653 Fax (650) 829-5852 www.emlab.com

Client: Ardent Environmental Group, Inc.
C/O: Mr. Craig Metheny
Re: 100148003; 111 N. Hudson

Date of Sampling: 08-13-2010
Date of Receipt: 08-17-2010
Date of Report: 08-20-2010

ASBESTOS PLM REPORT: EPA-600/M4-82-020 & EPA METHOD 600/R-93-116

Location: 25, White roof mastic and membrane Lab ID-Version‡: 3067099-1

Sample Layers	Asbestos Content
Black Roofing Felt with Stones	ND
White Coating	ND
Composite Non-Asbestos Fibrous Content:	45% Glass Fibers
Sample Composite Homogeneity:	Good

Location: 26, White roof mastic and membrane Lab ID-Version‡: 3067100-1

Sample Layers	Asbestos Content
Black Roofing Felt with Stones	ND
White Coating	ND
Composite Non-Asbestos Fibrous Content:	45% Glass Fibers
Sample Composite Homogeneity:	Good

Location: 27, Light gray roof mastic Lab ID-Version‡: 3067101-1

Sample Layers	Asbestos Content
Black Roofing Felt with Stones	ND
White Coating	ND
Composite Non-Asbestos Fibrous Content:	45% Glass Fibers
Sample Composite Homogeneity:	Good

Location: 28, Light gray roof mastic Lab ID-Version‡: 3067102-1

Sample Layers	Asbestos Content
Black Roofing Felt with Stones	ND
White Coating	ND
Composite Non-Asbestos Fibrous Content:	45% Glass Fibers
Sample Composite Homogeneity:	Good

Location: 29, Gray roof mastic Lab ID-Version‡: 3067103-1

Sample Layers	Asbestos Content
Gray Roofing Mastic	ND
Composite Non-Asbestos Fibrous Content:	10% Cellulose
Sample Composite Homogeneity:	Good

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EMLab P&K
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Client: Ardent Environmental Group, Inc.
C/O: Mr. Craig Metheny
Re: 100148003; 111 N. Hudson

Date of Sampling: 08-13-2010
Date of Receipt: 08-17-2010
Date of Report: 08-20-2010

ASBESTOS PLM REPORT: EPA-600/M4-82-020 & EPA METHOD 600/R-93-116

Location: 30, Light gray roof mastic Lab ID-Version‡: 3067104-1

Sample Layers	Asbestos Content
Gray Roofing Mastic	ND
Composite Non-Asbestos Fibrous Content:	10% Cellulose
Sample Composite Homogeneity:	Good

Location: 31, Ceiling tile fissure pattern Lab ID-Version‡: 3067105-1

Sample Layers	Asbestos Content
Beige Ceiling Tile with Paint	ND
Composite Non-Asbestos Fibrous Content:	85% Cellulose
Sample Composite Homogeneity:	Good

Location: 32, Ceiling tile fissure pattern Lab ID-Version‡: 3067106-1

Sample Layers	Asbestos Content
Beige Ceiling Tile with Paint	ND
Composite Non-Asbestos Fibrous Content:	45% Cellulose 45% Glass Fibers
Sample Composite Homogeneity:	Good

Location: 33, Ceiling tile random pattern Lab ID-Version‡: 3067107-1

Sample Layers	Asbestos Content
Beige Ceiling Tile with Paint	ND
Composite Non-Asbestos Fibrous Content:	85% Cellulose
Sample Composite Homogeneity:	Good

Location: 34, Ceiling tile random pattern Lab ID-Version‡: 3067108-1

Sample Layers	Asbestos Content
Beige Ceiling Tile with Paint	ND
Composite Non-Asbestos Fibrous Content:	85% Cellulose
Sample Composite Homogeneity:	Good

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Client: Ardent Environmental Group, Inc.
C/O: Mr. Craig Metheny
Re: 100148003; 111 N. Hudson

Date of Sampling: 08-13-2010
Date of Receipt: 08-17-2010
Date of Report: 08-20-2010

ASBESTOS PLM REPORT: EPA-600/M4-82-020 & EPA METHOD 600/R-93-116

Location: 35, Yellow carpet mastic Lab ID-Version‡: 3067109-1

Sample Layers	Asbestos Content
Yellow Mastic	ND
Composite Non-Asbestos Fibrous Content:	< 1% Synthetic Fibers
Sample Composite Homogeneity:	Good

Location: 36, Yellow carpet mastic Lab ID-Version‡: 3067110-1

Sample Layers	Asbestos Content
Yellow Mastic	ND
Composite Non-Asbestos Fibrous Content:	< 1% Synthetic Fibers
Sample Composite Homogeneity:	Good

Location: 37, Yellow carpet mastic Lab ID-Version‡: 3067111-1

Sample Layers	Asbestos Content
Yellow Mastic	ND
Composite Non-Asbestos Fibrous Content:	< 1% Synthetic Fibers
Sample Composite Homogeneity:	Good

Location: 38, Gray and white sheet vinyl flooring and brown mastic Lab ID-Version‡: 3067112-1

Sample Layers	Asbestos Content
Yellow Mastic	ND
Gray Leveling Compound	ND
Gray Sheet Flooring with Backing	ND
Composite Non-Asbestos Fibrous Content:	25% Synthetic Fibers
Sample Composite Homogeneity:	Good

Location: 39, Gray and white sheet vinyl flooring and brown mastic Lab ID-Version‡: 3067113-1

Sample Layers	Asbestos Content
Yellow Mastic	ND
Gray Leveling Compound	ND
Gray Sheet Flooring with Backing	ND
Composite Non-Asbestos Fibrous Content:	25% Synthetic Fibers
Sample Composite Homogeneity:	Good

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Client: Ardent Environmental Group, Inc.
C/O: Mr. Craig Metheny
Re: 100148003; 111 N. Hudson

Date of Sampling: 08-13-2010
Date of Receipt: 08-17-2010
Date of Report: 08-20-2010

ASBESTOS PLM REPORT: EPA-600/M4-82-020 & EPA METHOD 600/R-93-116

Location: 40, Gray 12x12 floor tile with gray mastic Lab ID-Version‡: 3067114-1

Sample Layers	Asbestos Content
Gray Leveling Compound	ND
Yellow Mastic	ND
Gray Floor Tile	ND
Sample Composite Homogeneity:	Good

Location: 41, Gray 12x12 floor tile with yellow mastic Lab ID-Version‡: 3067115-1

Sample Layers	Asbestos Content
Yellow Mastic	ND
Gray Floor Tile	ND
Sample Composite Homogeneity:	Good

Location: 42, White mirror mastic Lab ID-Version‡: 3067116-1

Sample Layers	Asbestos Content
White Mastic	ND
Sample Composite Homogeneity:	Good

Location: 43, White mirror mastic Lab ID-Version‡: 3067117-1

Sample Layers	Asbestos Content
White Mastic	ND
Sample Composite Homogeneity:	Good

Location: 44, Yellow brown wainscot mastic Lab ID-Version‡: 3067118-1

Sample Layers	Asbestos Content
Tan Mastic	ND
Sample Composite Homogeneity:	Good

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Client: Ardent Environmental Group, Inc.
C/O: Mr. Craig Metheny
Re: 100148003; 111 N. Hudson

Date of Sampling: 08-13-2010
Date of Receipt: 08-17-2010
Date of Report: 08-20-2010

ASBESTOS PLM REPORT: EPA-600/M4-82-020 & EPA METHOD 600/R-93-116

Location: 45, Yellow brown wainscot mastic Lab ID-Version‡: 3067119-1

Sample Layers	Asbestos Content
Tan Mastic	ND
Sample Composite Homogeneity:	Good

Location: 46, Drywall/Joint compound Lab ID-Version‡: 3067120-1

Sample Layers	Asbestos Content
White Drywall	ND
Beige Joint Compound with Paint	< 1% Chrysotile
Composite Asbestos Fibrous Content:	< 1% Asbestos
Composite Non-Asbestos Fibrous Content:	2% Cellulose
Sample Composite Homogeneity:	Good

Comments: Composite content provided does not follow the guidelines set forth by NVLAP. This analysis was performed by following the NESHAP guidelines.

Location: 47, Drywall/Joint compound Lab ID-Version‡: 3067121-1

Sample Layers	Asbestos Content
White Drywall	ND
White Joint Compound with Paint	ND
Composite Non-Asbestos Fibrous Content:	2% Cellulose
Sample Composite Homogeneity:	Good

Location: 48, Yellow brown carpet mastic Lab ID-Version‡: 3067122-1

Sample Layers	Asbestos Content
Tan Mastic	ND
Sample Composite Homogeneity:	Good

Location: 49, Yellow brown carpet mastic Lab ID-Version‡: 3067123-1

Sample Layers	Asbestos Content
Tan Mastic	ND
Sample Composite Homogeneity:	Good

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San Bruno, CA: 1150 Bayhill Drive, #100, San Bruno, CA 94066 * (866) 888-6653

WEATHER	Fog	Rain	Snow	Wind	Clear
None					
Light					
Moderate					
Heavy					

[redacted]

Spore Trap 00691792

CONTACT INFORMATION

Company: Accent Environmental Group
Contact: Craig Metheny
Phone:
Address:
Special Instructions:

PROJECT INFORMATION

Project ID: 100148003
Project Desc.: 111 N. Hudson
Project Zip Code:
Sampling Date & Time: 8/13
PO Number:

TURNAROUND TIME (TAT)

STD - Standard (DEFAULT)
ND - Next Business Day
SD - Same Business Day Rush
WH - Weekend/Holiday

Samples received after 2pm or on weekends will be considered received the next business day. Please contact us in advance for rush turnaround requests and analysis need.

Sample ID	Description	Sample Type (Code)	TAT (Code)	Total Volume Area (if applicable)	Notes & Minimum Detection Limit
1	Drywall / Joint Compound	B	STD		
2	Drywall / Joint Compound				
3	Drywall / Joint Compound				
4	Drywall / Joint Compound				
5	Drywall / Joint Compound				
6	Drywall / Joint Compound w/ Texture				
7	Drywall / Joint Compound w/ Texture Coat				
8	Drywall / Joint Compound w/ Texture Coat				
9	Brown cove base mastic				
10	white cove base mastic				
11	white cove base mastic				
12	white cove base mastic				

Sample ID	Fungi - Spore Trap Analysis	Spore Trap Analysis - Other particles	Direct Microscopic Exam (Qualitative)	Quantitative Spore Count Direct Exam	1-Media Surface Fungi (Genus ID + Asp. spp.)	2-Media Surface Fungi (Genus ID + Asp. spp.)	3-Media Surface Fungi (Genus ID + Asp. spp.)	Culturable Air Fungi (Genus ID + Asp. spp.)	Gram Stain and Counts (Culturable Air and Surface Bacteria)	Legionella culture	Total Coliform, E.coli (Presence/Absence)	Membrane Filtration (Please specify organism)	MPN Bacteria (Please specify organism)	QuantiTray - Sewage Screen	Asbestos Analysis - PCM Airborne Fiber Count (NIOSH 7400)	Asbestos Analysis - PLM (EPA method 600/R-93-116)	PCR (please specify test)
1																X	
2																X	
3																X	
4																X	
5																X	
6																X	
7																X	
8																X	
9																X	
10																X	
11																X	
12																X	

Other Requests

SAMPLE TYPE CODE

BC - BioCassette	ST - Spore Trap: Zefon, Allergenco, Burkard...	T - Tape	D - Dust
A1S - Andersen		SW - Swab	SO - Soil
SAS - Surface Air Sampler	P - Potable Water	B - Bulk	
CP - Contact Plate	NP - Non-Potable Water	O - Other:	

RELINQUISHED BY	DATE & TIME
C. Metheny	8/16/10 1:00

RECEIVED BY	DATE & TIME
	8/17/10
	9:30

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San Bruno, CA: 1150 Bayhill Drive, #100, San Bruno, CA 94066 * (866) 888-6653

WEATHER	Fog	Rain	Snow	Wind	Clear
None					
Light					
Moderate					
Heavy					

REQUE

Non-Culturable

Spore Trap | Tape Swab Bulk | BioCa Water, | 00691792 | ther Requests

CONTACT INFORMATION

Company: Ardent Environmental Group
Contact: Craig Metheny
Phone:
Address:
Special Instructions:

PROJECT INFORMATION

Project ID: 100148 003
Project Desc.:
Project Zip Code:
Sampling Date & Time: 8/13
PO Number:

TURN AROUND TIME CODES (TAT)

STD - Standard (DEFAULT)
ND - Next Business Day
SD - Same Business Day Rush
WH - Weekend/Holiday

Rushes received after 2pm or on weekend will be considered received the next business day. Please alert us in advance of weekend analysis needs.

Sample ID	Description	Sample Type (below)	TAT (above)	Total Volume/Area (as applicable)	NOTES (Time of Day, Temp, R.H.)	Fungi - Spore Trap Analysis	Spore Trap Analysis - Other particles	Direct Microscopic Exam (Qualitative)	Quantitative Spore Count Direct Exam	1-Media Surface Fungi (Genus ID + Asp. spp.)	2-Media Surface Fungi (Genus ID + Asp. spp.)	3-Media Surface Fungi (Genus ID + Asp. spp.)	Culturable Air Fungi (Genus ID + Asp. spp.)	Gram Stain and Counts (Culturable Air and Surface Bacteria)	*Legionella* culture	Total Coliform, *E.coli* (Presence/Absence)	Membrane Filtration (Please specify organism)	MPN Bacteria (Please specify organism)	QuanoTray - Sewage Screen	Asbestos Analysis - PCM Airborne Fiber Count (NIOSH 7400)	Asbestos Analysis - PLM (EPA method 600/R-93-116)	PCR (please specify test)	
13	Brown cove base mastic	B	STD																		X		
14	Roof core																				X		
15	Roof core																				X		
16	Roof core																				X		
17	Roof core																				X		
18	Silver roof mastic																				X		
19	silver roof mastic																				X		
20	silver roof mastic																				X		
21	Gray roof mastic																				X		
22	silver roof mastic																				X		
23	white roof mastic																				X		
24	white roof mastic																				X		

SAMPLE TYPE CODES

BC - BioCassette	ST - Spore Trap: Zefon, Allergenco, Burkard...	T - Tape	D - Dust
A1S - Andersen		SW - Sweb	SO - Soil
SAS - Surface Air Sampler	P - Potable Water	B - Bulk	
CP - Contact Plate	NP - Non-Potable Water	O - Other:	

RELINQUISHED BY	DATE & TIME	RECEIVED BY	DATE & TIME
C. Metheny [signature]	8/16/10 1:00	[signature]	081770
			9:30

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San Bruno, CA: 1150 Bayhill Drive, #100, San Bruno, CA 94066 • (866) 888-6653

WEATHER	Fog	Rain	Snow	Wind	Clear
None					
Light					
Moderate					
Heavy					

REQUESTED SE

Non-Culturable | Cul

Spore Trap | Tape Swab Bulk | BioCassette™ Air | Water, Bulk, Dus

100691792

CONTACT INFORMATION

Company: Ardent Environmental

Contact: Craig Methany

Phone:

Address:

Special Instructions:

PROJECT INFORMATION

Project ID: 100148003

Project Desc.:

Project Zip Code:

Sampling Date & Time: 8/13/10

PO Number:

TURNAROUND TIME CODES - (TAT)

STD - Standard (DEFAULT)

ND - Next Business Day

SD - Same Business Day Rush

WH - Weekend/Holiday

[illegible] weekends will be considered [illegible] business day. Please allow [illegible] weekend analysis [illegible]

Sample ID	Description	Sample Type (Show)	TAT (Above)	Total Volume/Area (If applicable)	NOTES (Include Sample Matrix)	Fungi - Spore Trap Analysis	Spore Trap Analysis - Other particles	Direct Microscopic Exam (Qualitative)	Quantitative Spore Count Direct Exam	1-Media Surface Fungi (Genus ID + Asp. spp.)	2-Media Surface Fungi (Genus ID + Asp. spp.)	3-Media Surface Fungi (Genus ID + Asp. spp.)	Culturable Air Fungi (Genus ID + Asp. spp.)	Gram Stain and Counts (Culturable Air and Surface Bacteria)	*Legionella* culture	Total Coliform, *E.coli* (Presence/Absence)	Membrane Filtration (Please specify organism)	MPN Bacteria (Please specify organism)	QuantiTray - Sewage Screen	Asbestos Analysis - PCM Airborne Fiber Count (NIOSH 7400)	Asbestos Analysis - PLM (EPA method 600/R-93-116)	PCR (please specify test)
25	White roof mastic & membrane	B	STD																			
26	White roof mastic & membrane																					
27	Light gray roof mastic																					
28	Light gray roof mastic																					
29	Gray roof mastic																					
30	Light gray roof mastic																					
31	ceiling tile fissure pattern																					
32	ceiling tile fissure pattern																					
33	ceiling tile random pattern																					
34	ceiling tile random pattern																					
35	Yellow carpet mastic																					
36	Yellow carpet mastic																					

SAMPLE TYPE CODES

BC - BioCassette™	ST - Spore Trap: Zefon, Allergenco, Burkard...	T - Tape	D - Dust
AIS - Andersen		SW - Swab	SO - Soil
SAS - Surface Air Sampler	P - Potable Water	B - Bulk	
CP - Contact Plate	NP - Non-Potable Water	O - Other:	

RELINQUISHED BY	DATE & TIME
C. Methany	8/16/10 1:00

RECEIVED BY	DATE & TIME
[illegible]	
[illegible]	081710
	9:30

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San Bruno, CA: 1150 Bayhill Drive, #100, San Bruno, CA 94066 * (866) 888-6653

WEATHER	Fog	Rain	Snow	Wind	Clear
None					
Light					
Moderate					
Heavy					

REQUESTED SERVI

Non-Culturable: Spore Trap; Tape Swab Bulk

Cultura: BioCassette™ - Anders Water, Bulk, Dust, So

00691792

CONTACT INFORMATION

Company: Ardent Environmental
Contact: Craig Metheny
Phone:
Address:
Special Instructions:

PROJECT INFORMATION

Project ID: 100148003
Project Desc.:
Project Zip Code:
Sampling Date & Time: 8/13/10
PO Number:

TURN AROUND TIME CODES (TAT)

STD - Standard (DEFAULT)
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SD - Same Business Day Rush
WH - Weekend/Holiday

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Sample ID	Description	Sample Type (Below)	TAT (Above)	Total Volume/Area (as applicable)	NOTES (Time of day, Temperature, etc.)
37	Yellow carpet mastic	B	STD		
38	Gray & white sheet vinyl flooring				
39	" & brown mastic				
40	Gray 12x12 floor tile w/ Gray mastic				
41	Gray 12x12 floor tile w/ yellow mastic				
42	white mirror mastic				
43	white mirror mastic				
44	Yellow-Brown wainscot mastic				
45	Yellow - Brown wainscot mastic				
46	Drywall / Joint Compound				
47	Drywall / Joint compound				
48	Yellow-Brown carpet mastic				

Fungi - Spore Trap Analysis	Spore Trap Analysis - Other particles	Direct Microscopic Exam (Qualitative)	Quantitative Spore Count Direct Exam	1-Media Surface Fungi (Genus ID + Asp. spp.)	2-Media Surface Fungi (Genus ID + Asp. spp.)	3-Media Surface Fungi (Genus ID + Asp. spp.)	Culturable Air Fungi (Genus ID + Asp. spp.)	Gram Stain and Counts (Culturable Air and Surface Bacteria)	Legionella culture	Total Coliform, Ecoli (Presence/Absence)	Membrane Filtration (Please specify organism)	MPN Bacteria (Please specify organism)	QuantiTray - Sewage Screen	Asbestos Analysis - PCM Airborne Fiber Count (NIOSH 7400)	Asbestos Analysis - PLM (EPA method 600/R-93-116)	PCR (please specify test)

SAMPLE TYPE CODES

BC - BioCassette™	ST - Spore Trap: Zefon, Allergenco, Burkard...	T - Tape	D - Dust
A1S - Andersen		SW - Swab	SO - Soil
SAS - Surface Air Sampler	P - Potable Water	B - Bulk	
CP - Contact Plate	NP - Non-Potable Water	O - Other:	

RELINQUISHED BY	DATE & TIME
C. Metheny [signature]	8/16/10 1:00

RECEIVED BY	DATE & TIME
[signature]	081710 9:30

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San Bruno, CA: 1150 Bayhill Drive, #100, San Bruno, CA 94066 • (866) 888-6653

WEATHER	Fog	Rain	Snow	Wind	Clear
None					
Light					
Moderate					
Heavy					

REQUESTED SERVIC

Non-Culturable: Spore Trap; Tape Swab Bulk

Cultural: BioCassette™ Anders Water, Bulk, Dust, So

00691792

CONTACT INFORMATION

Company: Ardent Environmental

Contact: Craig Metheny

Phone:

Address:

Special Instructions:

PROJECT INFORMATION

Project ID: 100148003

Project Desc.:

Project Zip Code:

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SD - Same Business Day Rush

WH - Weekend/Holiday

Rushes received after 2pm or on weekends will be considered received the next business day. Please alert us in advance of weekend analysis needs.

Sample ID	Description	Sample Type (Below)	TAT (Above)	Total Volume/Area (as applicable)	NOTES (Time of day, Temp, RH, etc.)	Fungi - Spore Trap Analysis	Spore Trap Analysis - Other particles	Direct Microscopic Exam (Qualitative)	Quantitative Spore Count Direct Exam	1-Media Surface Fungi (Genus ID + Asp. spp.)	2-Media Surface Fungi (Genus ID + Asp. spp.)	3-Media Surface Fungi (Genus ID + Asp. spp.)	Culturable Air Fungi (Genus ID + Asp. spp.)	Gram Stain and Counts (Culturable Air and Surface Bacteria)	Legionella culture	Total Coliform, Ecoli (Presence/Absence)	Membrane Filtration (Please specify organism)	MPN Bacteria (Please specify organism)	QuantiTray - Sewage Screen	Asbestos Analysis - PCM Airborne Fiber Count (NIOSH 7400)	Asbestos Analysis - PLM (EPA method 600/R-93-116)	PCR (please specify test)
49	Yellow-Brown carpet mastic	B	STD																		X	

SAMPLE TYPE CODES

BC - BioCassette™	ST - Spore Trap: Zefon, Allergenco, Burkard...	T - Tape	D - Dust
A1S - Andersen		SW - Swab	SO - Soil
SAS - Surface Air Sampler	P - Potable Water	B - Bulk	
CP - Contact Plate	NP - Non-Potable Water	O - Other:	

RELINQUISHED BY	DATE & TIME
C. Metheny	8/16/10 1:00

RECEIVED BY	DATE & TIME
	08/17/10 9:30

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APPENDIX B

CERTIFICATIONS

State of California
Division of Occupational Safety and Health

Certified Asbestos Consultant

Craig A Metheny
Name

Certification No. **08-4421**

Expires on **09/18/10**

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

United States Department of Commerce
National Institute of Standards and Technology

NVLAP®

Certificate of Accreditation to ISO/IEC 17025:2005

NVLAP LAB CODE: 200757-0

EMLab P&K

Westminster, CA

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

BULK ASBESTOS FIBER ANALYSIS

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

2010-01-01 through 2010-12-31

Effective dates

DEPARTMENT OF COMMERCE ★ UNITED STATES OF AMERICA ★

Sally S. Bruce

For the National Institute of Standards and Technology

National Voluntary
Laboratory Accreditation Program

SCOPE OF ACCREDITATION TO ISO/IEC 17025:2005

EMLab P&K
Avalon Center
5555 Garden Grove Blvd. Ste 275
Westminster, CA 92683
Mr. Michael J Madry
Phone: 623-298-1015 Fax: 623-445-6217
E-Mail: mmadry@emlabpk.com
URL: www.emlabpk.com

BULK ASBESTOS FIBER ANALYSIS (PLM) **NVLAP LAB CODE 200757-0**

NVLAP Code	*Designation / Description*
18/A01	EPA-600/M4-82-020: Interim Method for the Determination of Asbestos in Bulk Insulation Samples

2010-01-01 through 2010-12-31
Effective dates

Sally S. Bruce
For the National Institute of Standards and Technology

NVLAP-01S (REV. 2005-05-19)

ARDENT ENVIRONMENTAL GROUP, INC.

August 30, 2010
Project No. 100148003

Mr. Kevin Radecki
Industry Urban-Development Agency
15625 East Stafford Street, Suite 200
City of Industry, California 91744

Subject: Miscellaneous Hazardous Building Materials Survey
Building Demolition at
111 North Hudson Avenue
City of Industry, California

Dear Mr. Radecki:

Ardent Environmental Group, Inc. (Ardent) performed a pre-demolition survey of miscellaneous hazardous building materials for the building located at 111 North Hudson Avenue, City of Industry, California (site). Suspect miscellaneous hazardous building materials include polychlorinated biphenyl (PCB)-containing light fixture ballasts, fluorescent light tubes (FLTs), mercury-containing thermostat switches, and Halogen or Freon-containing equipment (e.g. air conditioning units and water coolers). This report has been prepared for Industry Urban-Development Agency (Agency) in general accordance with contract number 4-ARDENT 10-01 MP 08-13.

BUILDING LOCATION AND DESCRIPTION

The site is located at 111 North Hudson Avenue in the City of Industry, Los Angeles County, California (Figure 1). The site comprises approximately 1.75-acres and has been assigned the Tax Assessor's Parcel Number (APN) 8208-024-027.

The site is a square-shaped parcel occupied by one approximately 39,600-square foot industrial/warehouse building. At the time of this report the site was unoccupied. The site building was

Phone: (951) 736-5334
Fax: (951) 736-7560

1141 Pomona Road, Suite E
Corona, California 92882

constructed in 1967/1968 and contains an approximately 7,400 square foot office area, including a 1,400 square foot mezzanine, and an approximately 32,000 square foot warehouse area.

SURVEY RESULTS

Ardent performed a visual survey of the building on August 17, 2010. Based on the results of the survey, the following hazardous or universal waste materials were identified in the building.

- Suspect PCB-containing light fixture ballasts;
- Fluorescent lit tubes;
- Mercury-containing thermostats;
- Mercury-containing vapor light bulbs; and
- Air-conditioning units.

The estimated quantity and locations of these materials are summarized in Table 1

RECOMMENDATIONS

The results of the miscellaneous hazardous building materials survey indicate that universal waste rule and other miscellaneous hazardous materials are present at the site building. Ardent recommends that each of these materials be removed prior to demolition of the building.

The quantity of PCB-containing fluorescent light fixture ballasts was estimated by Ardent by random spot checks within each room of the building. Ardent recommends that all light fixtures be visually inspected prior to disposal to determine if they contain PCBs. Ballasts that are not marked "No PCBs" or "PCB Free" should be considered PCB-containing. PCB-containing ballasts should be handled, transported, and disposed in accordance with the requirements of Title 22 of the California Code of Regulations (CCR), Section 67426.1.

Fluorescent light tubes, mercury-containing thermostat switches, and mercury vapor lamps should be removed and disposed of in accordance with the Universal Waste Rule, Title 22 CCR, Section 66273.

Freon or Chlorofluorocarbons (CFC) in refrigeration or air conditioning units should be captured and recycled in accordance with the requirements of the South Coast Air Quality Management District Rule 1415.

LIMITATIONS

The services provided and the information obtained is relevant for the date the services were performed and valid as of the date of this letter. This letter is conclusive with respect to the information obtained. No warranty, express or implied, is intended regarding the results of this report and any subsequent reports, correspondence, or consultation. The information obtained is not intended to address potential impacts related to sources other than those specified herein. The findings and conclusions presented in this letter are relevant to the portions of the structure investigated.

The estimated quantities of ACMs and ACCMs provided in the table accompanying this report are for discussion and management purposes only. The actual quantities may vary and should be verified by the asbestos abatement contractor prior to abatement.

The findings and conclusions as presented in this letter are based on the services provided, and should not be interpreted as a warranty that asbestos does not exist elsewhere in the subject structure. All ACMs in the site building may not have been identified by this survey due to inaccessible or hidden building features. Furthermore, although samples were collected from each identified homogeneous area, the homogeneity of materials cannot be guaranteed. Therefore, additional sampling and testing may be necessary to provide a higher degree of confidence regarding the presence of asbestos in the building.

The services summarized herein were performed in accordance with the local standard of care and state-of-the industry practices in the geographic region at the time the services were rendered. Because the most comprehensive survey may not detect all asbestos in a building, Ardent cannot act as an insurer or certify that the site building is free of asbestos.

We appreciate the opportunity to be of service on this project.

Sincerely,
Ardent Environmental Group, Inc.

Craig A. Metheny, R.E.A.
Certified Asbestos Consultant #08-4421

Paul A. Roberts, P.G., R.E.A. I/II
Principal Geologist

CM/PAR/paw

Attachments: Table 1 – Universal Wastes/Miscellaneous Materials

Distribution: (1) Addressee

Table 1 – Universal Wastes/Miscellaneous Materials

Feature	Possible Hazardous Component	Location	Total Estimated Quantity
Fluorescent Light Ballasts	PCBs	Throughout Office and Warehouse	72
Fluorescent Light Tubes	Mercury	Throughout Office and Warehouse	158 – 8 ft long 120 – 4 ft long
Mercury Vapor Lamps	Mercury	Warehouse	26
Thermostat Switches	Liquid mercury and/or lead batteries	Throughout Office	4 – Mercury 2 – Battery
Air Conditioning Units	Freon or CFC gases	Roof	5

PCB – polychlorinated biphenyls
CFC – Chlorofluorocarbons

WINZLER & KELLY

PRE-DEMOLITION
LEAD TESTING SERVICES REPORT

Project Site:

Warehouse/Office Building
111 North Hudson Avenue
City of Industry, California 91744

Prepared For:

Mr. Craig Metheny
Ardent Environmental Group, Inc.
1141 Pomona Road, Suite E
Corona, California 92882

Prepared By:

WINZLER & KELLY
3750 Convoy Street, Suite 220
San Diego, California 92111
(858) 244-0440

W&K Project Number: 1156010010.77010

September 3, 2010

WINZLER & KELLY

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SECTION 1

EXECUTIVE SUMMARY

WINZLER & KELLY

EXECUTIVE SUMMARY

At the request of Ardent Environmental Group, Inc. (Ardent), Winzler & Kelly performed lead testing services for the purposes of planned demolition activities at the warehouse and office building located at 111 North Hudson Avenue in the City of Industry, County of Los Angeles, California.

The survey was conducted to sample representative building components for the presence of lead-containing surface coatings, lead-based paints and lead-bearing substances (LCSCs, LBPs and LBSs).

Physical limitations, such as locked rooms, were not encountered during the testing activities. There is a possibility that additional hazardous materials may be encountered in inaccessible areas (e.g., interstitial ceiling and wall spaces) during building demolition activities. Suspect hazardous materials encountered during demolition activities that have not been assessed either may be assumed to be hazardous and handled accordingly, or may be sampled and analyzed to assess whether they are hazardous.

The results of the testing indicate that hazardous building materials ***are*** present at the subject building. The following table list the hazardous materials identified within the subject site building, including the location and the estimated total quantity of the identified hazardous materials:

WAREHOUSE AND OFFICE BUILDING 111 NORTH HUDSON AVENUE CITY OF INDUSTRY			
MATERIAL/COMPONENT DESCRIPTION	**LOCATION**	**CONDITION**	**ESTIMATED TOTAL QUANTITY (SF/LF/EA)**
Lead-Based Paints (Color/Substrate/Component):			
Yellow/Metal/Ballard	Exterior	Intact	5 EA
White/Metal/Door	Exterior	Intact	5 EA
Beige/Metal/Access Hatch	Roof	Intact	1 EA
Yellow/Metal/Water pipe stripe	Mezzanine	Intact	2 SF
White/Metal/Sliding Fire Door	Warehouse 1	Intact	2 EA
Red/Metal/Column	Warehouse 1	Intact	13 EA
White/Wood/Beams + Ceiling (Assumed)	Warehouse 2	Intact	8,600 SF
Note [1] Lead-Containing Surface Coatings Detected: Refer to the XRF Lead Data Table in Appendix C			

Notes:
SF = square feet
EA = each
LF = linear feet
Lead-Based Paint = 0.7 milligrams per square centimeter (mg/cm^2) of lead or greater is present, as defined by the Los Angeles County Health and Safety Code
Lead-Containing Surface Coatings = 0.10 up to 0.7 mg/cm^2 of lead present (8 California Code of Regulations [CCR] 1532.1). Refer to the XRF Lead Data Table (Appendix c) for building components and surface coatings considered LCSCs at the subject building.
Lead-Bearing Substances = 0.70 mg/cm^2 of lead or greater is present
Note[1] = Contractor is responsible for employee exposure monitoring during disturbance/demolition of LCSCs.

Lead Testing Services

The lead testing services revealed that building components with coatings defining them as ***LBPs*** and ***LCSCs*** ***are*** present at the subject site building, which may be impacted by the impending demolition activities.

All demolition involving potential and identified lead-containing surfaces should be conducted in accordance with Title 8, California Code of Regulations, Section 1532.1 and 29 CFR 1926.62. In addition, all activities involving identified lead-based paints must be conducted in accordance with Title 17, California Code of Regulations, Division 1, Chapter 8, Sections 35001 through 36100, which proscribes the use of State of California Department of Public Health (CDPH)-certified workers, work practices, and other requirements.

At present there is no state or federal regulation requiring mandatory lead removal or abatement prior to disturbance or demolition of structures with identified lead materials. However, there are applicable California Occupational Safety and Health Administration (Cal/OSHA) worker protection and training requirements; California Environmental Protection Agency (Cal/EPA) waste disposal requirements, CDPH requirements for public and residential buildings, and Senate Bill (SB) 460 lead hazard regulations that apply to lead-related construction activities, abatement activities and their associated wastes. The following is a brief discussion and summary of applicable regulatory requirements:

- **Cal/OSHA:** Title 8, California Code of Regulation (CCR), Section 1532.1 (8 CCR 1532.1) governs occupational exposure to lead. This regulation requires that prior to initiation of certain activities, referred to as "trigger tasks", workers must be trained, medically evaluated, and properly fitted with respiratory protection, and protective clothing until statistically reliable personal eight-hour time weighted average (TWA) results indicate lead exposure levels below the Personal Exposure Limit (PEL) for each unique task which disturbs lead-based and lead-containing coatings. This process is known as a Negative Exposure Assessment or NEA. If the result of the exposure assessment is above the Action Level (AL) additional monitoring is required and if the result is above the PEL additional exposure monitoring, worker protection (including respirator protection and personal protective equipment [PPE]), training and medical requirements apply. However even where the NEA criteria is met, certain hazard communication training and work practice controls still apply where lead is disturbed.

  "Trigger tasks" are tasks that are assumed to exceed the PEL pending an exposure assessment and they encompass the majority of construction activities that disturb surface coatings. Examples of "trigger" tasks range from manual paint scraping as a lower expected exposure up to hot work and abrasive blasting as the highest expected exposures, and include any non-listed task that the employer determines may potentially expose employees to lead levels above the AL.

  NOTE – "OSHA does not consider any method that relies solely on the analysis of bulk materials or surface content of lead (or other toxic material) to be acceptable for safely predicting employee exposure to airborne contaminates. Without air monitoring results or without the benefit of historical or objective data (including air sampling which clearly demonstrates that the employee can not be exposed above the action level during any process, operation, or activity) the analysis of bulk or surface samples can not be used to determine employee exposure." OSHA Standard Interpretation 5/8/2000.

Furthermore, OSHA states that these rules apply to "any detectable concentration of lead" without a specified detection level. Due to the Consumer Product Safety Commission currently allowing paint to contain up to 600 parts per million (ppm) of lead, the variation of lead content due to aging and weathering, and the variation of detection limits associated with both paint chip and XRF analysis, it is recommended that all painted or coated surfaces be treated as potentially containing lead. Clearly, positive analytical results by either method can be used to indicate that detectable lead is present but negative results cannot be interpreted as conclusively demonstrating the absence of lead. Analytical data of bulk paint/coating materials or surface content (by XRF) of lead can be helpful in evaluation of lead-related environmental risks in general but cannot be used to calculate worker exposures and are not a substitute for employee exposure monitoring.

As a result of the above, any employee that works around potential lead-based or lead-containing coatings must have HAZCOM training and personal exposure air monitoring is additionally required for employees that disturb such coatings. Significant additional certification, notification, and work practices are required for materials found to be "lead-based".

- Any welding, cutting or heating of metal surfaces containing surface coatings should be conducted in accordance with 29 CFR 1926.354 and 8 CCR 1537. These regulations require surfaces covered with toxic preservatives, and in enclosed areas, be stripped of all toxic coatings for a distance of at least 4 inches, in all directions, from the area of heat application prior to the initiation of such heat application.

- **Cal/EPA** through the Division of Toxic Substance Control (DTSC) regulates disposal of lead hazardous waste (Title 22 Division 4.5, Environmental Health Standards for the Management of Hazardous Waste). DTSC has issued guidance indicating that architectural debris with intact lead paint is normally expected to be handled as general construction waste. However, waste stream segregation and analysis is still required for all paint or coating debris regardless of if the paint or coating is intact on a building component or not. The resulting wastes may be hazardous under California and federal RCRA standards for lead and therefore require proper handling, packaging, labeling, and transportation under a proper manifest to a permitted hazardous waste storage, treatment and disposal facility.

- **CDPH**: The CDPH has specific requirements (Title 17 Sections 35001 thru 36100 et. al.) for hazard assessment and work in public or residential structures. These regulations require special certifications, work practices, and notification for such activities.

- **Senate Bill 460 (SB 460)**: An act to amend Section 1941.1 of the Civil Code, and to amend Sections 17961, 17980, and 124130 of, and to add Sections 17920.10, 105251, 105252, 105253, 105254, 105255, 105256, and 105257 to, the Health and Safety Code, relating to lead abatement. This bill allows for fines and criminal penalties to be levied on any person who is found to have performed lead abatement without containment or created a measurable lead hazard based upon current CDPH standards. The testing for this determination can be initiated by any local or state building inspector, health department inspector, or other designated state or local official. A determination of a lead hazard is not solely based upon the lead content of the paint or coating and can be the result of the disturbance of such materials with low concentrations of lead.

Written notification to Cal/OSHA must be accomplished should LBP activities involve more than 100 square or linear feet of removal in accordance with the requirements of 8 CCR 1532.1. Proper written notification to CDPH ***may*** be required, depending upon the nature of the activity.

Proper waste characterization and disposal of lead-containing materials and lead-contaminated debris should be conducted in accordance with Title 22 of the California Code of Regulations and the California Health and Safety Code, Section 25157.8.

It is the contractor's responsibly to confirm the hazardous material quantities present prior to initiating renovation or demolition activities at the subject buildings. Should materials similar to those identified in this report, or other forms of suspect hazardous materials be present or identified, maintenance personnel/contractors should be instructed to immediately cease work activities which may initiate a fiber release episode, and notify the appropriate management personnel.

Report prepared for Ardent by:

Stephen S. Reese
Project Manager
CDPH Lead Inspector-Assessor/Project Monitor #13938
Registered Environmental Assessor I #08323

Report reviewed and signed for Ardent by:

Jerry R. Sherman, LEED AP
Environmental Service Line Manager
CDPH Lead Inspector-Assessor #5809

WINZLER & KELLY

SECTION 2

MAIN BODY OF REPORT

INTRODUCTION

At the request of Ardent Environmental Group, Inc. (Ardent), Winzler & Kelly performed lead testing services for the purposes of planned demolition activities at the warehouse and office building located at 111 North Hudson Avenue in the City of Industry, County of Los Angeles, California.

The survey was conducted to sample representative building components for the presence of lead-containing surface coatings, lead-based paints, and lead-bearing substances (LCSCs, LBPs, and LBSs).

The survey was performed on August 26 and 27, 2010 by Mr. Stephen Reese and Peter Kolesar. Mr. Reese performed report preparation and Mr. Jerry Sherman performed report review. Mr. Reese, Mr. Kolesar and Mr. Sherman are California Department of Public Health (CDPH)-Certified Lead-Related Inspectors/Risk Assessors. Mr. Reese and Mr. Kolesar are also CDPH-Certified Lead Project Monitors. All members of the survey team are employees of Winzler & Kelly and have received Hazardous Waste Operations and Emergency Response (HAZWOPER) training in accordance with 8 California Code of Regulations (CCR) 5194. Copies of certifications can be found in Appendix A.

Building Description

The survey and testing was conducted at a warehouse and office building located at 111 North Hudson Avenue in the City of Industry, County of Los Angeles, California. The building is approximately 35,000 square feet in size, vacant and formerly used as offices and a warehouse that consisted of a concrete-frame building with floors finished with vinyl tile, carpet or ceramic tile; interior walls finished with wallboard (drywall)/joint compound, wall panels, or base cove; interior ceilings finished with drywall/joint compound, plaster or acoustic panels; exterior walls finished with concrete; exterior ceiling overhangs finished with concrete; and roofs consisted of built-up roofing materials.

Physical limitations, such as locked rooms, were not encountered during the survey and testing activities. There is a possibility that additional hazardous materials may be encountered in inaccessible areas (e.g., interstitial ceiling and wall spaces) during building demolition activities. Suspect hazardous materials encountered during demolition activities that have not been assessed either may be assumed to be hazardous and handled accordingly, or may be sampled and analyzed to assess whether they are hazardous.

METHODOLOGY

Lead-Containing Surface Coatings/Lead-Based Paints/Lead-Bearing Substances (LCSCs/LBPs/LBSs) - Analytical Methodology

Potential LCSCs/LBPs/LBSs were identified via visual identification. The representative, suspect surface coatings were then measured on-site through the use of a NITON XL x-ray fluorescence (XRF) spectrum analyzer, in accordance with the requirements of the manufacturer's performance characteristics sheet (PCS) for this instrument.

The U.S. Department of Housing and Urban Development (HUD) specifies that lead-based paint (LBP) is present when paint contains lead equal or greater than 1.0 milligram per square centimeter (by XRF) by area or 0.5 percent by weight or 5,000 parts per million. For the purposes of this lead testing (based on the location of the subject site buildings) in accordance with the Los Angeles County Health and Safety Code that defines

"dangerous levels of lead-bearing substances" as "any paint, varnish, lacquer, putty, plaster, or similar coating or structural material which contains lead or its compounds in excess of seven-tenths (0.7) of one milligram per square centimeter," the XRF measurement data results were interpreted as follows:

1. Positive results (LBPs/LBSs present) were determined when analytical results revealed a lead concentration of 0.7 milligram per square centimeter (mg/cm^2) or greater.

2. Positive results (LCSCs present) were determined when analytical results revealed a lead concentration of 0.1 mg/cm^2 or greater, up to 0.7 mg/cm^2.

3. Negative results (LCSCs not present) were determined when analytical results revealed a lead concentration of less than 0.1 mg/cm^2 which is below the analytical sensitivity of the XRF measurement methodology. **Please review the information in the "Recommendations/Conclusions" section prior to any disturbance of materials noted as being negative or LCSC.**

RESULTS

Lead-Testing

A total of 239 XRF measurements (with calibration readings) for the determination of lead content were collected from the subject site building on August 26 and 27, 2010. The analytical results for this testing indicate that the following building components and respective surface coatings did have lead concentrations defining them as ***LBPs*** in accordance with the Los Angeles County Health and Safety Code (locations, conditions, and estimated total quantity of materials are found in the Executive Summary):

111 N. Hudson Ave. Warehouse/Office Building

1. Yellow/Metal/Ballard
2. White/Metal/Door
3. Beige/Metal/Access Hatch
4. Yellow/Metal/Water pipe stripe
5. White/Metal/Sliding Fire Door
6. Red/Metal/Column
7. White/Wood/Beams + Ceiling (Assumed/Inaccessible due to ceiling height)

All other surface coatings tested exhibited Lead concentrations below the LBP standard. Positive lead XRF reading and lead testing maps can be found in Appendix B. Individual XRF measurement results and LCSCs can be found in Appendix C. A copy of the Lead Hazard Evaluation Report (Form 8552) sent to the California Department of Public Health is included as Appendix D.

CONCLUSIONS/RECOMMENDATIONS

Lead Testing Services

The lead testing services revealed that building components with coatings defining them as ***LBPs*** and ***LCSCs are*** present at the subject site building, which may be impacted by the impending demolition activities.

All demolition involving potential and identified lead-containing surfaces should be conducted in accordance with Title 8, California Code of Regulations, Section 1532.1 and 29 CFR 1926.62. In addition, all activities involving identified lead-based paints must be conducted in accordance with Title 17, California Code of Regulations, Division 1, Chapter 8, Sections 35001 through 36100, which proscribes the use of State of California Department of Public Health (CDPH)-certified workers, work practices, and other requirements.

At present there is no state or federal regulation requiring mandatory lead removal or abatement prior to disturbance or demolition of structures with identified lead materials. However, there are applicable California Occupational Safety and Health Administration (Cal/OSHA) worker protection and training requirements; California Environmental Protection Agency (Cal/EPA) waste disposal requirements, CDPH requirements for public and residential buildings, and Senate Bill (SB) 460 lead hazard regulations that apply to lead-related construction activities, abatement activities and their associated wastes. The following is a brief discussion and summary of applicable regulatory requirements:

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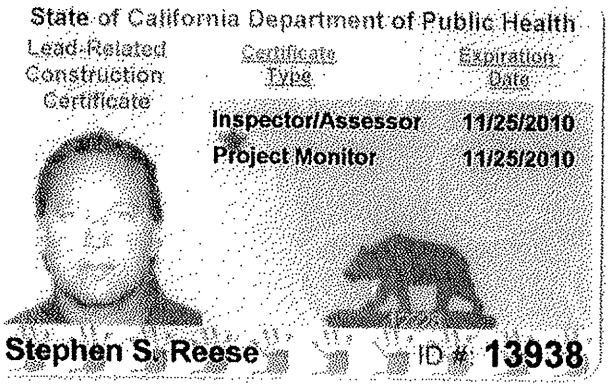
APPENDIX A

CERTIFICATIONS

Mr. Stephen S. Reese
Winzler & Kelly
4180 Ruffin Road, #115
San Diego, California 92123

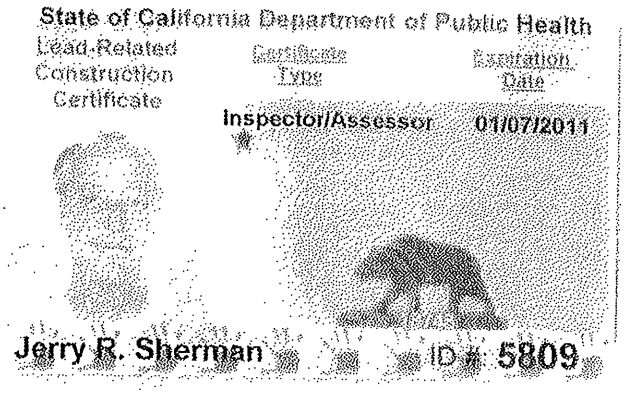


State of California Department of Public Health

Lead-Related Construction Certificate

Certificate Type	Expiration Date
Inspector/Assessor	12/03/2010
Project Monitor	12/03/2010

Peter J. Kolesar, Jr. ID #: **12431**

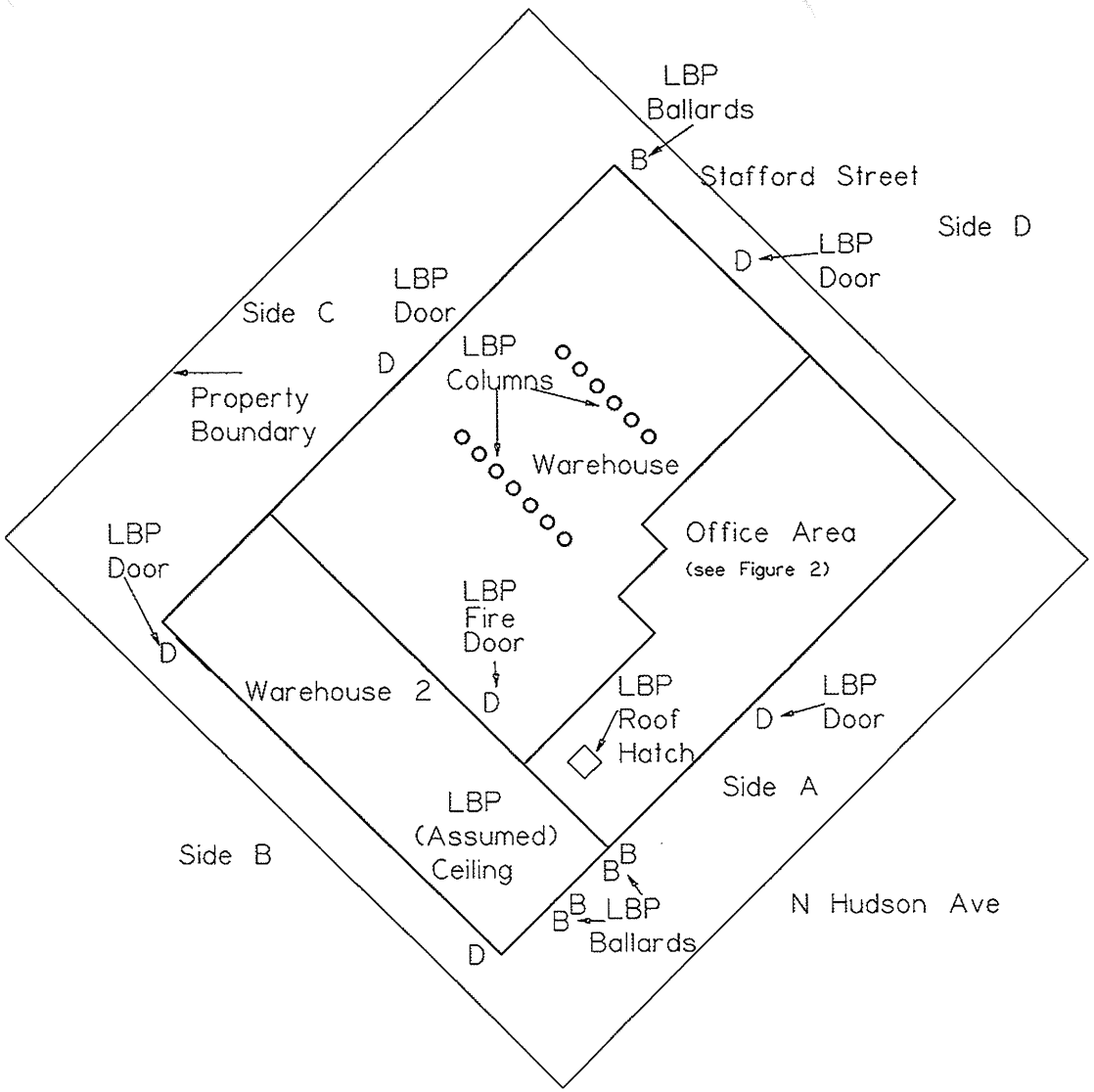


Mr. Jerry R. Sherman
Winzler & Kelly Consulting Engineers
4180 Ruffin Road, #115
San Diego, California 92123

WINZLER & KELLY

APPENDIX B

LEAD TESTING MAPS



111 North Hudson Ave

Warehouse

LEGEND

Side A-D = Lead Testing Orientation
LBP = Lead-Based Paint
D = Door
B = Ballard

N

WINZLER&KELLY

3750 Convoy St, Suite 220
San Diego, CA 92111
PH (858) 244-0440
FAX (858) 244-0441

Drawing not to scale.
All directions and locations are approximate.

By: Reese

Report Date: 09/03/10

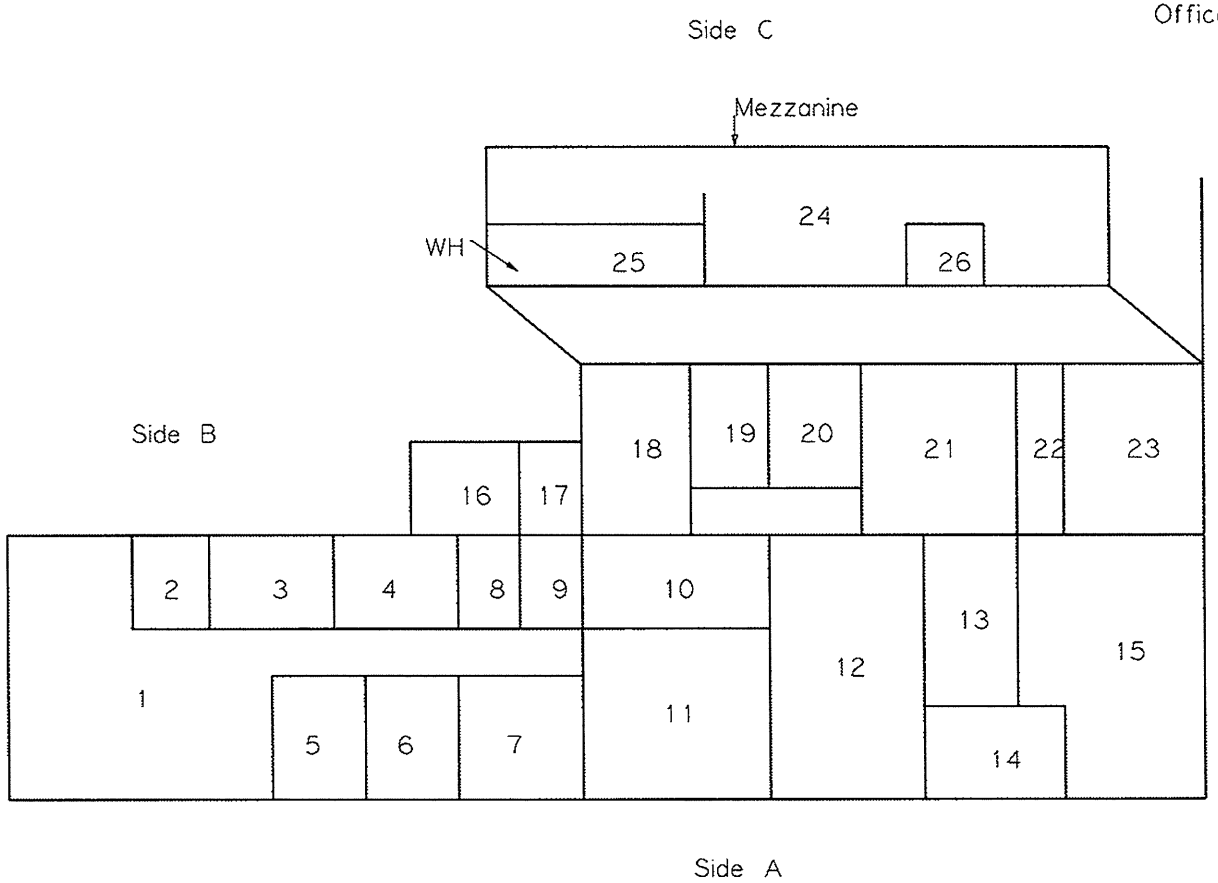
Location: 111 North Hudson Ave
City of Industry
California

Subject: Lead Testing Map

Figure 1

Job #: 1156010010

111 North Hudson Ave
Offices



LEGEND

Side A-D = Lead Testing Orientation
LBP = Lead-Based Point
WH = Water Heater
RR = Restroom
N/A = No Access

N

WINZLER&KELLY
3750 Convoy St, Suite 220
San Diego, CA 92111
PH (858) 244-0440
FAX (858) 244-0441

Drawing not to scale.
All directions and locations are approximate.

By: Reese

Report Date: 09/03/10

Location: 111 North Hudson Ave
City of Industry
California

Subject: Lead Testing Map

Figure 2

Job #: 1156010010

WINZLER & KELLY

APPENDIX C

XRF LEAD DATA TABLE

WINZ AND KELLY

XRF LEAD TA TABLE

111 N. HUDSON AVE., CITY OF INDUSTRY, CA

READING NO.	TESTING DATE	COLOR	SUBSTRATE	COMPONENT	CONDITION	SIDE	ROOM	FLOOR	MISC	RESULTS	LEAD (mg/cm^2)
1	8/26/2010				SHUTTER_CALIBRATION						5.03
2	8/26/2010					CALIBRATE				Positive	1.1
3	8/26/2010					CALIBRATE				Positive	1.1
4	8/26/2010					CALIBRATE				Positive	1
5	8/26/2010	WHITE	CONCRETE	WALL	INTACT	A		1	EXTERIOR	Negative	0.07
6	8/26/2010	WHITE	CONCRETE	CEILING	INTACT	A	OVERHANG	1	EXTERIOR	Negative	0.06
7	8/26/2010	BEIGE	CONCRETE	CEILING	INTACT	A	OVERHANG	1	EXTERIOR	Negative	0.04
8	8/26/2010	WHITE	CMU	WALL	INTACT	A		1	EXTERIOR	Negative	0.01
9	8/26/2010	WHITE	CMU	WALL	INTACT	A		1	EXTERIOR	Null	0.01
10	8/26/2010	WHITE	METAL	PIPE	INTACT	A		1	EXTERIOR	Negative	0.08
11	8/26/2010	RED	METAL	PIPE	POOR	A		1	EXTERIOR	Null	0
12	8/26/2010	RED	METAL	PIPE	POOR	A		1	EXTERIOR	Negative	0
13	*8/26/2010*	*YELLOW*	*METAL*	*BALLARD*	*INTACT*	*A*		*1*	*EXTERIOR*	*LBP*	*1.6*
14	8/26/2010	WHITE	METAL	CONDUIT	INTACT	A		1	EXTERIOR	Negative	0
15	8/26/2010	WHITE	METAL	RAIN GUTTER	INTACT	A		1	EXTERIOR	Negative	0.01
16	8/26/2010	WHITE	METAL	UTILITY BOX	INTACT	A		1	EXTERIOR	Negative	0
17	8/26/2010	WHITE	METAL	ROLLUP DOOR	INTACT	A		1	EXTERIOR	Negative	0
18	8/26/2010	WHITE	METAL	ROLLUP DOOR FRAME	INTACT	A		1	EXTERIOR	Negative	0.01
19	8/26/2010	WHITE	METAL	DOOR	INTACT	A		1	EXTERIOR	LCSC	0.21
20	8/26/2010	WHITE	METAL	DOOR JAMB	INTACT	A		1	EXTERIOR	Negative	0.02
21	8/26/2010	BEIGE	CONCRETE	WALL	INTACT	D		1	EXTERIOR	Negative	0.09
22	8/26/2010	WHITE	CONCRETE	WALL	INTACT	D		1	EXTERIOR	Negative	0.02
23	*8/26/2010*	*WHITE*	*METAL*	*DOOR*	*INTACT*	*D*		*1*	*EXTERIOR*	*LBP*	*0.7*
24	8/26/2010	WHITE	METAL	DOOR FRAME	INTACT	D		1	EXTERIOR	Negative	0.01
25	8/26/2010	WHITE	CONCRETE	WALL	INTACT	C		1	EXTERIOR	Negative	0.01
26	8/26/2010	WHITE	METAL	RAIN GUTTER	INTACT	C		1	EXTERIOR	Negative	0
27	8/26/2010	WHITE	METAL	ROLLUP DOOR	INTACT	C		1	EXTERIOR	Negative	0.01
28	8/26/2010	WHITE	METAL	ROLLUP DOOR FRAME	INTACT	C		1	EXTERIOR	Negative	0.02
29	8/26/2010	WHITE	METAL	HAND RAIL	INTACT	C		1	EXTERIOR	Negative	0.01
30	8/26/2010	WHITE	METAL	HAND RAIL	INTACT	C		1	EXTERIOR	Negative	0.01
31	8/26/2010	WHITE	CONCRETE	WALL	INTACT	B		1	EXTERIOR	Negative	0.01
32	8/26/2010	YELLOW	CONCRETE	ROOF	FAIR	A	OVERHANG	1	EXTERIOR	Negative	0.01
33	8/26/2010	YELLOW	CONCRETE	ROOF	FAIR	A	OVERHANG	1	EXTERIOR	Negative	0.01
34	8/26/2010	WHITE	CONCRETE	WALL	INTACT	A	7	1	INTERIOR	Negative	0
35	8/26/2010	WHITE	CONCRETE	CMU	INTACT	A	7	1	INTERIOR	Null	0
36	8/26/2010	WHITE	CONCRETE	CMU	INTACT	D	7	1	INTERIOR	Negative	0
37	8/26/2010	WHITE	DRYWALL	WALL	INTACT	B	7	1	INTERIOR	Negative	0
38	8/26/2010	WHITE	DRYWALL	CEILING	INTACT	B	HALLWAY	1	INTERIOR	LCSC	0.5
39	8/26/2010	WHITE	WOOD	DOOR	INTACT	C	6	1	INTERIOR	Negative	0.01
40	8/26/2010	WHITE	WOOD	DOOR JAMB	INTACT	C	6	1	INTERIOR	LCSC	0.5
41	8/26/2010	WHITE	DRYWALL	WALL	INTACT	D	6	1	INTERIOR	Null	0
42	8/26/2010	WHITE	DRYWALL	WALL	INTACT	D	6	1	INTERIOR	Negative	0

WINZ AND KELLY

XRF LEAD DATA TABLE

111 N. HUDSON AVE., CITY OF INDUSTRY, CA											
READING NO.	TESTING DATE	COLOR	SUBSTRATE	COMPONENT	CONDITION	SIDE	ROOM	FLOOR	MISC	RESULTS	LEAD (mg/cm^2)
43	8/26/2010	WHITE	WOOD	WINDOW CASING	INTACT	D	6	1	INTERIOR	LCSC	0.5
44	8/26/2010	WHITE	DRYWALL	WALL	INTACT	C	HALLWAY	1	INTERIOR	LCSC	0.29
45	8/26/2010	WHITE	WOOD	WINDOW CASING	INTACT	D	1	1	INTERIOR	Negative	0
46	8/26/2010	WHITE	WOOD	DOOR	INTACT	C	1	1	INTERIOR	Negative	0
47	8/26/2010	WHITE	WOOD	DOOR JAMB	INTACT	C	1	1	INTERIOR	Negative	0
48	8/26/2010	WHITE	CONCRETE	COLUMN	INTACT	C	1	1	INTERIOR	Negative	0
49	8/26/2010	WHITE	METAL	CONDUIT	INTACT	B	1	1	INTERIOR	Negative	0
50	8/26/2010	WHITE	METAL	PIPE	INTACT	B	1	1	INTERIOR	LCSC	0.3
51	8/26/2010	WHITE	DRYWALL	WALL	INTACT	B	8	1	INTERIOR	LCSC	0.27
52	8/26/2010	WHITE	PLASTIC	WALL PANEL	INTACT	B	8	1	INTERIOR	Negative	0
53	8/26/2010	WHITE	DRYWALL	CEILING	INTACT	B	8	1	INTERIOR	Negative	0.05
54	8/26/2010	WHITE	PORCELAIN	SINK	INTACT	D	8	1	INTERIOR	Negative	0.05
55	8/26/2010	WHITE	PORCELAIN	TOILET	INTACT	D	8	1	INTERIOR	Negative	0.03
56	8/26/2010	WHITE	PORCELAIN	URINAL	INTACT	D	9	1	INTERIOR	Negative	0.03
57	8/26/2010	GRAY	CERAMIC	WALL	INTACT	B	9	1	INTERIOR	Negative	0.01
58	8/26/2010	GRAY	CERAMIC	FLOOR	INTACT	B	9	1	INTERIOR	Negative	0
59	8/26/2010	WHITE	PORCELAIN	SINK	INTACT	B	9	1	INTERIOR	Negative	0.06
60	8/26/2010	WHITE	PORCELAIN	TOILET	INTACT	B	9	1	INTERIOR	Negative	0
61	8/26/2010	WHITE	WOOD	WINDOW CASING	INTACT	B	12	1	INTERIOR	Negative	0
62	8/26/2010	WHITE	CONCRETE	WALL	INTACT	A	12	1	INTERIOR	Negative	0.01
63	8/26/2010	WHITE	METAL	CONDUIT	INTACT	A	12	1	INTERIOR	Negative	0
64	8/26/2010	WHITE	DRYWALL	WALL	INTACT	D	12	1	INTERIOR	Negative	0.01
65	8/26/2010	WHITE	DRYWALL	WALL	INTACT	C	12	1	INTERIOR	Negative	0
66	8/26/2010	WHITE	CONCRETE	WALL	INTACT	D	15	1	INTERIOR	Negative	0
67	8/26/2010	WHITE	WOOD	DOOR	INTACT	B	15	1	INTERIOR	Negative	0
68	8/26/2010	WHITE	DRYWALL	CEILING	INTACT	B	23	1	INTERIOR	LCSC	0.5
69	8/26/2010	WHITE	DRYWALL	CEILING	INTACT	B	23	1	INTERIOR	Null	0
70	8/26/2010	WHITE	DRYWALL	CEILING	INTACT	B	23	1	INTERIOR	Null	0
71	8/26/2010	WHITE	DRYWALL	CEILING	INTACT	B	23	1	INTERIOR	Null	0
72	8/26/2010	WHITE	DRYWALL	CEILING	INTACT	B	23	1	INTERIOR	Null	0
73	8/26/2010	WHITE	DRYWALL	CEILING	INTACT	B	23	1	INTERIOR	Negative	0
74	8/26/2010	WHITE	METAL	CEILING VENT	INTACT	B	23	1	INTERIOR	Negative	0
75	8/26/2010	WHITE	CONCRETE	COLUMN	INTACT	D	23	1	INTERIOR	Negative	0
76	8/26/2010					CALIBRATE				Positive	1.5
77	8/26/2010					CALIBRATE				Positive	1.6
78	8/26/2010					CALIBRATE				Positive	1.7
79	8/26/2010					CALIBRATE				Positive	1.1
80	8/26/2010					CALIBRATE				Positive	1.7
81	8/26/2010					CALIBRATE				Positive	1.8
82	8/26/2010					CALIBRATE				Positive	1.1
83	8/26/2010					CALIBRATE				Positive	1.1
84	8/26/2010					CALIBRATE				Positive	2.1

111 N. HUDSON AVE., CITY OF INDUSTRY, CA											
READING NO.	TESTING DATE	COLOR	SUBSTRATE	COMPONENT	CONDITION	SIDE	ROOM	FLOOR	MISC	RESULTS	LEAD (mg/cm^2)
85	8/26/2010					CALIBRATE				Null	1
86	8/26/2010					CALIBRATE				Positive	1
87	8/26/2010					CALIBRATE				Positive	1.2
88	8/26/2010					CALIBRATE				Positive	1
89	8/27/2010				SHUTTER_CALIBRATION						5.24
90	8/27/2010					CALIBRATE				Positive	1
91	8/27/2010					CALIBRATE				Positive	1.1
92	8/27/2010					CALIBRATE				Positive	1.1
93	8/27/2010	BEIGE	METAL	AC DUCT	INTACT	A	ROOF		EXTERIOR	Negative	0
94	8/27/2010	SILVER	METAL	AC DUCT	INTACT	A	ROOF		EXTERIOR	Negative	< LOD
95	8/27/2010	GREEN	METAL	AC UNIT	INTACT	A	ROOF		EXTERIOR	Negative	0
96	8/27/2010	BEIGE	METAL	AC UNIT	INTACT	D	ROOF		EXTERIOR	Negative	0
97	8/27/2010	GRAY	METAL	SKYLIGHT	INTACT	D	ROOF		EXTERIOR	Negative	0
98	8/27/2010	WHITE	WOOD	AC STAND	FAIR	D	ROOF		EXTERIOR	Negative	0
99	8/27/2010	WHITE	WOOD	AC STAND	INTACT	A	ROOF		EXTERIOR	Negative	0
100	*8/27/2010*	*BEIGE*	*METAL*	*ACCESS HATCH*	*INTACT*	*A*	*ROOF*		*EXTERIOR*	*LBP*	*1.6*
101	8/27/2010	WHITE	DRYWALL	WALL	INTACT	A	MEZZ	2	INTERIOR	Negative	0
102	8/27/2010	WHITE	WOOD	LADDER	INTACT	A	MEZZ	2	INTERIOR	Negative	0
103	8/27/2010	WHITE	METAL	DUCT	INTACT	A	MEZZ	2	INTERIOR	Negative	0
104	8/27/2010	WHITE	WOOD	DOOR	INTACT	A	MEZZ	2	INTERIOR	Negative	0.01
105	8/27/2010	WHITE	WOOD	DOOR JAMB	INTACT	B	MEZZ	2	INTERIOR	Negative	0
106	8/27/2010	WHITE	DRYWALL	WALL	INTACT	C	MEZZ	2	INTERIOR	Negative	0
107	8/27/2010	WHITE	DRYWALL	WINDOW SILL	INTACT	C	MEZZ	2	INTERIOR	Negative	0
108	8/27/2010	WHITE	METAL	COLUMN	INTACT	CENTER	MEZZ	2	INTERIOR	Negative	0.02
109	8/27/2010	WHITE	DRYWALL	WALL	INTACT	CENTER	MEZZ	2	INTERIOR	Negative	0
110	8/27/2010	WHITE	WOOD	DOOR	INTACT	C	MEZZ	2	INTERIOR	Negative	0
111	8/27/2010	WHITE	WOOD	DOOR FRAME	INTACT	C	MEZZ	2	INTERIOR	Negative	0.01
112	8/27/2010	WHITE	WOOD	DOOR JAMB	INTACT	C	MEZZ	2	INTERIOR	Negative	0
113	8/27/2010	WHITE	WOOD	DOOR JAMB	INTACT	C	MEZZ	2	INTERIOR	Negative	0
114	8/27/2010	WHITE	DRYWALL	CEILING	INTACT	A	MEZZ	2	INTERIOR	Negative	0
115	8/27/2010	WHITE	WOOD	CROSS BEAM	INTACT	A	MEZZ	2	INTERIOR	Negative	0
116	8/27/2010	WHITE	WOOD	BEAM	INTACT	C	MEZZ	2	INTERIOR	Negative	0
117	8/27/2010	WHITE	METAL	BEAM BRASE	INTACT	C	MEZZ	2	INTERIOR	Negative	0
118	8/27/2010	WHITE	CONCRETE	WALL	INTACT	D	MEZZ	2	INTERIOR	Negative	0
119	8/27/2010	WHITE	CONCRETE	COLUMN	INTACT	D	MEZZ	2	INTERIOR	Negative	0
120	8/27/2010	WHITE	METAL	WATER PIPE	INTACT	D	MEZZ	2	INTERIOR	Negative	0
121	8/27/2010	WHITE	METAL	WATER PIPE	INTACT	C	MEZZ	2	INTERIOR	Negative	0.01
122	*8/27/2010*	*YELLOW*	*METAL*	*WATER PIPE STRIPE*	*INTACT*	*C*	*MEZZ*	*2*	INTERIOR	*LBP*	*1.1*
123	8/27/2010	BLUE	METAL	HANDRAIL	INTACT	D	MEZZ	2	INTERIOR	Negative	0.02
124	8/27/2010	BEIGE	METAL	HANDRAIL	INTACT	D	MEZZ	2	INTERIOR	Negative	0.02
125	8/27/2010	BEIGE	METAL	STAIR STRINGER	INTACT	D	MEZZ	2	INTERIOR	Negative	0
126	8/27/2010	BEIGE	METAL	STAIR STEPS	INTACT	D	MEZZ	2	INTERIOR	Negative	0

111 N. HUDSON AVE., CITY OF INDUSTRY, CA											
READING NO.	TESTING DATE	COLOR	SUBSTRATE	COMPONENT	CONDITION	SIDE	ROOM	FLOOR	MISC	RESULTS	LEAD (mg/cm^2)
127	8/27/2010	YELLOW	METAL	STAIR STEPS	INTACT	D	MEZZ	2	INTERIOR	Negative	0.01
128	8/27/2010	BEIGE	METAL	STAIR LANDING	INTACT	D	MEZZ	2	INTERIOR	Negative	0
129	8/27/2010	BEIGE	WOOD	STAIR STEPS	INTACT	B	MEZZ	2	INTERIOR	Negative	0
130	8/27/2010	BEIGE	WOOD	STAIR STRINGER	INTACT	B	MEZZ	2	INTERIOR	Negative	0
131	8/27/2010	BEIGE	METAL	HANDRAIL	INTACT	B	MEZZ	2	INTERIOR	Negative	0
132	8/27/2010	RED	METAL	FIRE CASE	INTACT	D	WHS 1	1	INTERIOR	Negative	0
133	8/27/2010	RED	CONCRETE	FIRE STRIPE	INTACT	D	WHS 1	1	INTERIOR	LCSC	0.28
134	8/27/2010	BLACK	METAL	DOOR	INTACT	D	WHS 1	1	INTERIOR	Negative	0.03
135	8/27/2010	WHITE	METAL	DOOR JAMB	INTACT	D	WHS 1	1	INTERIOR	Negative	0.01
136	8/27/2010	WHITE	DRYWALL	WALL	INTACT	A	WHS 1	1	INTERIOR	Negative	0
137	8/27/2010	WHITE	DRYWALL	WALL	INTACT	A	WHS 1	1	INTERIOR	Negative	0
138	8/27/2010	WHITE	DRYWALL	WALL	INTACT	A	WHS 1	1	INTERIOR	Negative	0
139	8/27/2010	WHITE	WOOD	BASEBOARD	INTACT	A	WHS 1	1	INTERIOR	Negative	0
140	8/27/2010	WHITE	WOOD	BASEBOARD GAURD	INTACT	A	WHS 1	1	INTERIOR	Negative	0
141	8/27/2010	WHITE	WOOD	DOOR	INTACT	A	WHS 1	1	INTERIOR	Negative	0.09
142	8/27/2010	WHITE	WOOD	DOOR JAMB	INTACT	A	WHS 1	1	INTERIOR	Negative	0.02
143	*8/27/2010*	*WHITE*	*METAL*	*SLIDING FIRE DOOR*	*INTACT*	*B*	*WHS 1*	*1*	INTERIOR	*LBP*	*4.6*
144	8/27/2010	WHITE	METAL	FIRE DOOR JAMB	INTACT	B	WHS 1	1	INTERIOR	Negative	0
145	8/27/2010	WHITE	CONCRETE	WALL	INTACT	B	WHS 1	1	INTERIOR	Negative	0
146	8/27/2010	WHITE	CONCRETE	COLUMN	INTACT	B	WHS 1	1	INTERIOR	Negative	0
147	8/27/2010	WHITE	CONCRETE	WALL	INTACT	B	WHS 1	1	INTERIOR	Negative	0
148	8/27/2010	WHITE	CONCRETE	COLUMN	INTACT	B	WHS 1	1	INTERIOR	Negative	0
149	8/27/2010	WHITE	CONCRETE	WALL	INTACT	C	WHS 1	1	INTERIOR	Negative	0
150	8/27/2010	WHITE	METAL	WALL BRACE	INTACT	C	WHS 1	1	INTERIOR	Negative	0
151	8/27/2010	WHITE	CONCRETE	WALL	INTACT	C	WHS 1	1	INTERIOR	Negative	0
152	8/27/2010	WHITE	METAL	DOOR	INTACT	C	WHS 1	1	INTERIOR	Negative	0.06
153	8/27/2010	WHITE	METAL	DOOR JAMB	INTACT	C	WHS 1	1	INTERIOR	Negative	0
154	8/27/2010	WHITE	CONCRETE	WALL	INTACT	D	WHS 1	1	INTERIOR	Negative	0
155	8/27/2010	WHITE	CONCRETE	WALL	INTACT	D	WHS 1	1	INTERIOR	Negative	0
156	8/27/2010	WHITE	CONCRETE	COLUMN	INTACT	D	WHS 1	1	INTERIOR	Negative	0
157	*8/27/2010*	*RED*	*METAL*	*COLUMN*	*INTACT*	*CENTER*	*WHS 1*	*1*	INTERIOR	*LBP*	*1.8*
158	8/27/2010	WHITE	WOOD	WINDOW FRAME	INTACT	A	WHS 1	1	INTERIOR	Negative	0
159	8/27/2010	WHITE	METAL	WINDOW	INTACT	A	WHS 1	1	INTERIOR	Negative	0
160	8/27/2010	WHITE	DRYWALL	WALL	INTACT	A	WHS 1 16	1	INTERIOR	Negative	0
161	8/27/2010	WHITE	DRYWALL	WALL	INTACT	B	WHS 1 16	1	INTERIOR	Negative	0
162	8/27/2010	WHITE	DRYWALL	WALL	INTACT	C	WHS 1 16	1	INTERIOR	Negative	0
163	8/27/2010	WHITE	DRYWALL	WALL	INTACT	C	WHS 1 16	1	INTERIOR	Negative	0
164	8/27/2010	WHITE	DRYWALL	WALL	INTACT	D	WHS 1 16	1	INTERIOR	Negative	0
165	8/27/2010	WHITE	DRYWALL	CEILING	INTACT	D	WHS 1 16	1	INTERIOR	Negative	0
166	8/27/2010	WHITE	PORCELAIN	TOILET	INTACT	D	WHS 1 16	1	INTERIOR	Negative	0.01
167	8/27/2010	WHITE	PORCELAIN	URINAL	INTACT	C	WHS 1 16	1	INTERIOR	Negative	0.01
168	8/27/2010	WHITE	PORCELAIN	SINK	INTACT	C	WHS 1 16	1	INTERIOR	Negative	0.01

WINZ AND KELLY

XRF LEAD DATA TABLE

111 N. HUDSON AVE., CITY OF INDUSTRY, CA

READING NO.	TESTING DATE	COLOR	SUBSTRATE	COMPONENT	CONDITION	SIDE	ROOM	FLOOR	MISC	RESULTS	LEAD (mg/cm^2)
169	8/27/2010	GRAY	METAL	PARTITION	INTACT	D	WHS 1 16	1	INTERIOR	Negative	0.05
170	8/27/2010	GRAY	METAL	PARTITION	INTACT	D	WHS 1 16	1	INTERIOR	LCSC	0.18
171	8/27/2010	WHITE	WOOD	DOOR	INTACT	B	WHS 1 16	1	INTERIOR	Negative	0
172	8/27/2010	WHITE	METAL	DOOR JAMB	INTACT	B	WHS 1 16	1	INTERIOR	Negative	0
173	8/27/2010	GRAY	CERAMIC TILE	WALL	INTACT	C	WHS 1 16	1	INTERIOR	Negative	0
174	8/27/2010	WHITE	CONCRETE	WALL	INTACT	A	WHS 2	1	INTERIOR	Negative	0
175	8/27/2010	WHITE	CONCRETE	WALL	INTACT	A	WHS 2	1	INTERIOR	Negative	0
176	8/27/2010	WHITE	METAL	WATER PIPE	INTACT	A	WHS 2	1	INTERIOR	Negative	0.05
177	8/27/2010	RED	METAL	BALLARD	INTACT	A	WHS 2	1	INTERIOR	Negative	0
178	8/27/2010	RED	CONCRETE	STRIPE	FAIR	A	WHS 2	1	INTERIOR	LCSC	0.4
179	8/27/2010	GRAY	METAL	ELEC BOX	INTACT	A	WHS 2	1	INTERIOR	Negative	0
180	8/27/2010	WHITE	CONCRETE	WALL	INTACT	B	WHS 2	1	INTERIOR	Negative	0.03
181	8/27/2010	WHITE	CONCRETE	COLUMN	INTACT	B	WHS 2	1	INTERIOR	LCSC	0.12
182	8/27/2010	WHITE	CONCRETE	WALL	INTACT	B	WHS 2	1	INTERIOR	Negative	0.02
183	8/27/2010	WHITE	CONCRETE	COLUMN	INTACT	B	WHS 2	1	INTERIOR	Negative	0.01
184	8/27/2010	WHITE	METAL	DOOR	INTACT	B	WHS 2	1	INTERIOR	Negative	0.04
185	8/27/2010	WHITE	METAL	DOOR JAMB	INTACT	B	WHS 2	1	INTERIOR	Negative	0.09
186	8/27/2010	WHITE	CONCRETE	WALL	INTACT	C	WHS 2	1	INTERIOR	Negative	0.01
187	8/27/2010	WHITE	CONCRETE	WALL	INTACT	C	WHS 2	1	INTERIOR	Negative	0.01
188	8/27/2010	WHITE	WOOD	WALL PANEL	INTACT	C	WHS 2	1	INTERIOR	Negative	0
189	8/27/2010	GRAY	WOOD	WALL PANEL	INTACT	C	WHS 2	1	INTERIOR	Negative	0
190	8/27/2010	GRAY	CONCRETE	WALL	INTACT	D	WHS 2	1	INTERIOR	Negative	0.01
191	8/27/2010	WHITE	CONCRETE	COLUMN	INTACT	D	WHS 2	1	INTERIOR	Negative	0.03
192	8/27/2010	WHITE	CONCRETE	WALL	INTACT	D	WHS 2	1	INTERIOR	Negative	0.09
193	8/27/2010	WHITE	CONCRETE	COLUMN	INTACT	D	WHS 2	1	INTERIOR	Negative	0.04
194	8/27/2010				SHUTTER_CALIBRATION						1.49
195	8/27/2010					CALIBRATE				Positive	1.1
196	8/27/2010					CALIBRATE				Positive	1
197	8/27/2010					CALIBRATE				Positive	1
198	8/27/2010	WHITE	DRYWALL	WALL	INTACT	A	RR 17	1	INTERIOR	Negative	0.01
199	8/27/2010	WHITE	DRYWALL	WALL	INTACT	C	RR 17	1	INTERIOR	Negative	0
200	8/27/2010	WHITE	DRYWALL	CEILING	INTACT	B	RR 17	1	INTERIOR	Negative	0
201	8/27/2010	WHITE	PORCELAIN	SINK	INTACT	C	RR 17	1	INTERIOR	Negative	0.05
202	8/27/2010	WHITE	PORCELAIN	TOILET	INTACT	C	RR 17	1	INTERIOR	Negative	0.02
203	8/27/2010	WHITE	WOOD	DOOR	INTACT	D	RR 17	1	INTERIOR	Negative	0
204	8/27/2010	WHITE	WOOD	DOOR JAMB	INTACT	D	RR 17	1	INTERIOR	Negative	0.03
205	8/27/2010	WHITE	DRYWALL	WALL	INTACT	B	RR 18	1	INTERIOR	Negative	0
206	8/27/2010	WHITE	DRYWALL	WALL	INTACT	D	RR 18	1	INTERIOR	Negative	0
207	8/27/2010	WHITE	WOOD	DOOR JAMB	INTACT	C	RR 18	1	INTERIOR	Negative	0
208	8/27/2010	WHITE	WOOD	DOOR	INTACT	C	RR 18	1	INTERIOR	Negative	0
209	8/27/2010	WHITE	WOOD	SHUTTERS	INTACT	A	RR 18	1	INTERIOR	Negative	0
210	8/27/2010	WHITE	DRYWALL	CEILING	INTACT	A	RR 18	1	INTERIOR	Negative	0

XRF LEAD DATA TABLE

111 N. HUDSON AVE., CITY OF INDUSTRY, CA

READING NO.	TESTING DATE	COLOR	SUBSTRATE	COMPONENT	CONDITION	SIDE	ROOM	FLOOR	MISC	RESULTS	LEAD (mg/cm^2)
211	8/27/2010	WHITE	DRYWALL	CEILING	INTACT	A	RR 19	1	INTERIOR	Negative	0
212	8/27/2010	WHITE	DRYWALL	CEILING	INTACT	A	RR 19	1	INTERIOR	Negative	0
213	8/27/2010	WHITE	WOOD	LIGHT FRAME	INTACT	B	RR 19	1	INTERIOR	Negative	0
214	8/27/2010	WHITE	DRYWALL	WALL	INTACT	A	RR 19	1	INTERIOR	Negative	0
215	8/27/2010	WHITE	DRYWALL	WALL	INTACT	C	RR 19	1	INTERIOR	Negative	0
216	8/27/2010	WHITE	METAL	DOOR JAMB	INTACT	A	RR 19	1	INTERIOR	Negative	0
217	8/27/2010	WHITE	WOOD	DOOR	INTACT	A	ROOM 20	1	INTERIOR	Negative	0
218	8/27/2010	WHITE	WOOD	DOOR JAMB	INTACT	A	ROOM 20	1	INTERIOR	Negative	0
219	8/27/2010	WHITE	DRYWALL	WALL	INTACT	B	ROOM 20	1	INTERIOR	Negative	0
220	8/27/2010	WHITE	DRYWALL	WALL	INTACT	D	ROOM 20	1	INTERIOR	Negative	0
221	8/27/2010	WHITE	WOOD	WINDOW FRAME	INTACT	D	ROOM 20	1	INTERIOR	Negative	0
222	8/27/2010	WHITE	WOOD	WINDOW FRAME	INTACT	B	ROOM 21	1	INTERIOR	Negative	0
223	8/27/2010	WHITE	DRYWALL	WALL	INTACT	A	ROOM 21	1	INTERIOR	Negative	< LOD
224	8/27/2010	WHITE	DRYWALL	WALL	INTACT	C	ROOM 21	1	INTERIOR	Negative	< LOD
225	8/27/2010	WHITE	DRYWALL	CEILING	INTACT	A	ROOM 21	1	INTERIOR	Negative	0
226	8/27/2010	WHITE	DRYWALL	CEILING	INTACT	A	ROOM 21	1	INTERIOR	Negative	0
227	8/27/2010	WHITE	DRYWALL	CEILING	INTACT	A	ROOM 21	1	INTERIOR	Negative	0
228	8/27/2010	WHITE	METAL	VENT	INTACT	A	ROOM 21	1	INTERIOR	Negative	0
229	8/27/2010	WHITE	METAL	VENT	INTACT	A	ROOM 21	1	INTERIOR	Negative	0
230	8/27/2010	WHITE	WOOD	DOOR	INTACT	B	ROOM 21	1	INTERIOR	Negative	0
231	8/27/2010	WHITE	WOOD	DOOR JAMB	INTACT	D	ROOM 21	1	INTERIOR	Negative	0
232	8/27/2010	WHITE	WOOD	DOOR JAMB	INTACT	D	ROOM 22	1	INTERIOR	Negative	0
233	8/27/2010	WHITE	WOOD	DOOR	INTACT	C	ROOM 22	1	INTERIOR	Negative	0
234	8/27/2010	WHITE	DRYWALL	WALL	INTACT	B	ROOM 22	1	INTERIOR	Negative	0
235	8/27/2010	WHITE	DRYWALL	WALL	INTACT	D	ROOM 22	1	INTERIOR	Negative	0
236	8/27/2010	WHITE	DRYWALL	CEILING	INTACT	A	ROOM 22	1	INTERIOR	Negative	0.03
237	8/27/2010					CALIBRATE				Positive	1.2
238	8/27/2010					CALIBRATE				Positive	1
239	8/27/2010					CALIBRATE				Positive	1

Notes:

XRF - X-ray fluorescence spectrum analyzer INT - Interior Null - Incomplete reading

mg/cm^2 - milligrams per square centimeter EXT - Exterior < LOD - Less than the limit of detection

LCSC - Lead-Containing Surface Coating (8 CCR 1532.1) lead present from 0.10 to 0.70 mg/cm^2

LBP - Lead-Based Paint (Los Angeles County), lead is present at 0.70 mg/cm^2 or greater

LBS - Lead-Bearing Substance, lead is present at 0.70 mg/cm^2 or greater

WINZLER & KELLY

APPENDIX D

CDPH LEAD HAZARD EVALUATION REPORT

LEAD HAZARD EVALUATION REPORT

Section 1 — Date of Lead Hazard Evaluation August 26 + 27, 2010

Section 2 — Type of Lead Hazard Evaluation (Check one box only)

☒ Lead Inspection ☐ Risk assessment ☐ Clearance Inspection ☐ Other (specify) _____

Section 3 — Structure Where Lead Hazard Evaluation Was Conducted

Address [number, street, apartment (if applicable)]	City	County	Zip Code
111 N. Hudson Ave.	City of Industry	Los Angeles	91744

Construction date (year) of structure	Type of structure		Children living in structure?
≈ 30 years old or older	☐ Multi-unit building ☐ Single family dwelling	☐ School or daycare ☒ Other Office/warehouse	☐ Yes ☒ No ☐ Don't Know

Section 4 — Owner of Structure (if business/agency, list contact person)

Name (Client)	Telephone number
Craig Methany	(951) 736-5334

Address [number, street, apartment (if applicable)]	City	State	Zip Code
1141 Pomona Rd, Suite E	Corona	CA	92882

Section 5 — Results of Lead Hazard Evaluation (check all that apply)

☐ No lead-based paint detected ☒ Intact lead-based paint detected ☐ Deteriorated lead-based paint detected

☐ No lead hazards detected ☐ Lead-contaminated dust found ☐ Lead-contaminated soil found ☐ Other _____

Section 6 — Individual Conducting Lead Hazard Evaluation

Name (Winzler and Kelly)	Telephone number
Stephen Reese + Peter Kolesar	(858) 244-0440

Address [number, street, apartment (if applicable)]	City	State	Zip Code
3750 Convoy St., Suite 220	San Diego	CA	92111

CDPH certification number	Signature	Date
13938 + 12431	Stephen Reese	9/2/10

Name and CDPH certification number of any other individuals conducting sampling or testing (if applicable)

See above

Section 7 — Attachments

A. A foundation diagram or sketch of the structure indicating the specifc locations of each lead hazard or presence of lead-based paint;
B. Each testing method, device, and sampling procedure used;
C. All data collected, including quality control data, laboratory results, including laboratory name, address, and phone number.

First copy and attachments retained by inspector

Second copy and attachments retained by owner

Third copy only (no attachments) mailed or faxed to:

California Department of Public Health
Childhood Lead Poisoning Prevention Branch Reports
850 Marina Bay Parkway, Building P, Third Floor
Richmond, CA 94804-6403
Fax: (510) 620-5656