ARDENT
ENVIRONMENTAL
GROUP, INC.

HAZARDOUS MATERIALS REMOVAL WORK PLAN BUILDING DEMOLITION 14624 NELSON AVENUE CITY OF INDUSTRY, CALIFORNIA

PREPARED FOR:
City of Industry
15625 East Stafford Street, Suite 100
City of Industry, California 91744

PREPARED BY:
Ardent Environmental Group, Inc.
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December 19, 2011
Project No. 100260003

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ENVIRONMENTAL
GROUP, INC.

December 19, 2011
Project No. 100260003

Mr. Kevin Radecki
City of Industry
15625 East Stafford Street, Suite 100
City of Industry, California 91744

Subject: Hazardous Materials Removal Work Plan
Building Demolition at
14624 Nelson Avenue
City of Industry, California

Dear Mr. Radecki:

In accordance with your authorization, Ardent Environmental Group, Inc. has completed this Hazardous Materials Removal Work Plan associated with the demolition of the buildings located at 14624 Nelson 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

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1. GENERAL

This Hazardous Materials Removal Work Plan (referred to herein as the "Work Plan") is to be followed prior to and/or during demolition of the buildings and facilities located at 14624 Nelson Avenue, City of Industry, California (site). This Work Plan presents the hazardous building materials and other miscellaneous hazardous materials or wastes located in the site buildings or on the site to be removed prior to demolition of the site buildings. This Work Plan 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 City of Industry (the "City" or "Owner"). The locations and quantities of hazardous building materials, including asbestos-containing materials (ACMs), asbestos-containing construction material (ACCM), lead-based paint (LBP), lead-bearing substances (LBS), lead-containing surface coatings (LCSCs), universal waste materials, and other miscellaneous hazardous materials are based on the results of surveys performed by Ardent Environmental Group, Inc. (Ardent) and Winzler & Kelly. The survey reports, provided in Appendix A, consist of the following.

Ardent Environmental Group, Inc., 2011a, Asbestos Survey, 14624 Nelson Avenue, City of Industry, California: unpublished report dated December 9.

Ardent Environmental Group, Inc. 2011b, Miscellaneous Hazardous Building Material Survey, 14624 Nelson Avenue, City of Industry, California: unpublished report dated December 9.

Winzler & Kelly, 2011, Pre-Demolition Lead Testing Services Report, Former Lumber Yard, 14624 Nelson Avenue, City of Industry, California: unpublished report dated November 9.

1.1. Project Location and Description

The site is located at 14624 Nelson Avenue in the City of Industry, Los Angeles County, California. The site is located on the southern side of Nelson Avenue, approximately 200 feet southeast of the intersection of Sunset Avenue and Nelson Avenue. The site has been assigned the Tax Assessor's Parcel Number (APN) 8208-006-902 and contains seven commercial buildings.

The site consists of a flag-shaped property comprising approximately 4.13 acres. The site is currently vacant and contains one approximately 2,400 square foot office building and six lumber storage canopy structures. The buildings were constructed in 1982. The site buildings are of wood frame construction. Floors are generally unfinished concrete except in the office which has floors finished with carpet, wood, and vinyl floor tiles. Ceilings are unfinished or are finished with suspended ceiling panels.

1.2. Objective

The objective of this Work Plan 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

The following scope of work is to be performed by the party entering into contract with the City for the work required by the Project Specifications (Contractor). 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.

- Pre-demolition abatement/removal and disposal of ACMs, ACCMs, and/or PACMs from the site buildings and related structures. The Contractor should refer to the Asbestos Survey Report (Ardent, 2011a) and Tables 1 and 2 for the location and estimated quantity of ACMs, ACCMs, or PACMs identified at the site.

- Pre-demolition abatement/removal of LBP, LBS, and/or LCSC, as needed, to perform the demolition activities. The Contractor should refer to the Lead Testing Services Report (Winzler & Kelly, 2011) and Table 3 for the location and estimated quantity of these materials identified at the site.

- Removal and disposal of other miscellaneous hazardous or universal wastes, including presumed PCB-containing fluorescent light ballasts, fluorescent light tubes, Freon or CFC gas from air conditioning or refrigeration units, and other miscellaneous materials. The Contractor should refer to the Miscellaneous Hazardous Building Material Survey Report (Ardent, 2011b) and Table 4 for the location and estimated quantity of miscellaneous hazardous or universal wastes identified at the site.

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 Work Plan.

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

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

1.5. Contractor's Responsibilities

- The Contractor is responsible for implementing all applicable aspects and provisions of this Work Plan.

- The Contractor shall assume full responsibility and liability for compliance with all applicable federal, state, and local regulations pertaining to work practices, worker protection, and general safety of site visitors and persons occupying areas adjacent to the site.

- The Contractor is responsible for providing training, medical examinations, and maintaining training/medical records of workers as required by applicable federal, state, and local regulations.

- The Contractor shall hold the Owner and Owner's Representative harmless for failure to comply with any applicable hazardous materials abatement, safety, health, transport, disposal, or other regulation, rule, or law on the part of the Contractor, Contractors employees, or subcontractors.

1.6. License Requirements

- The Contractor shall be currently licensed for the intended activities by the California Contractors State License Board (CSLB) and be registered to perform asbestos related work with the Division of Industrial Relations.

- The Contractor shall 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.

1.7. Permits

The Contractor shall obtain prior to the start of work and maintain in-place all permits required by Federal, State and local agencies to complete the work outlined in this Work Plan.

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 showing the anticipated starting and completion dates for each phase or area of abatement and all other hazardous material removal work covered by this Work Plan. 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.

C. The Contractor shall indicate the number and duration of shifts required to perform abatement 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 Work Plan, 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, lead, 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 Work Plan and applicable laws, rules, criteria, ordinances, and regulations may vary, the most stringent requirement shall apply.

A. The following regulations that may govern work performed by the Contractor under this Work Plan 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.
- 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 in the Construction Industry"
  - Section 5216, "General Safety, Lead Regulations"
- 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.
- 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
- South Coast Air Quality management District (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.
- CCR Title 17, Sections 35001-36100, Accreditation, Certification, and Work Practices for Lead-Based Paint and Lead Hazards.
- Los Angeles County Code and other local regulations.

1.10. Submittals

At least one week prior to the commencement of work, the Contractor shall submit two copies of the following documentation to the Owner's Representative.

A. Licenses and registrations required by Section 1.6 License Requirements (including subcontractors).

B. Written notifications to the SCAQMD, California Division of Occupational Safety and Health (Cal/OSHA), and California Department of Public Health (CDPH), as applicable.

C. Manufacturer's certification that high-efficiency particulate air (HEPA)-filtered vacuums, air filtration equipment, and other exhaust and ventilation equipment used on-site conform to American National Standards Institute (ANSI) Z9.2-79.

D. A site-specific work plan detailing asbestos, lead, and other hazardous and universal waste material removal and paint stabilization methods to be utilized by the Contractor, as needed. The plan shall include both emergency response and fire protection plans as required in Section 1.12 and 1.13. 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 Work Plan.

E. Manufacturer's product data or material safety data sheet (MSDS) for all chemical products to be used on-site.

F. A work schedule as required by Section 1.8.

G. Documentation that Contractor's employees who may be exposed to airborne asbestos fibers or may be responsible for any aspect of asbestos abatement have received training as required by 29 CFR 1926.1101.

H. Documentation that Contractor's employees performing LBP, LBS, or LCSC stabilization, removal, or air sampling operations have received lead worker training in accordance with Title 8 CCR 1532.1 and Title 17 CCR 35001-36100.

I. Documentation of annual respirator fit testing for all Contractor employees who enter the work area or don respirators for any reason.

J. 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.

K. Documentation of previous fiber concentration exposure levels from similar abatement projects for the Contractor's employees. This documentation shall meet the requirements of 29 CFR 1926.1101 Negative Hazard Assessment and Title 8 CCR 1529 as required by Cal/OSHA regulations.

During or immediately following the completion of asbestos, lead, or other hazardous or universal waste abatement or removal activities, the Contractor shall provide to the Owner's Representative copies of the following

A. Waste shipment records, hazardous waste manifests, and disposal receipts signed and dated by an agent of the landfill or receiving facility, certifying the amount of waste materials delivered, within three working days after delivery.

B. Copies of work area entry/exit logbook. Logbook must record name, affiliation, time in, and time out for each entry into the work area.

C. Copies of logs documenting filter changes on respirators, HEPA-filtered vacuums, air and water filtration devices, and other engineering controls.

D. Submit and post on-site the results of all required Cal/OSHA air monitoring.

E. Submit copies of all accident or injury reports.

F. Copies of daily work logs indicating the type, location, and quantity of materials removed and identity of workers conducting the activity.

1.11. Site Use and Security

A. The work area shall be restricted only to authorized, trained, and protected personnel.

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. These areas must be labeled with proper warning labels.

C. The Contractor shall maintain control of 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

Prior to initiation of work, emergency planning and procedures shall be developed in written form by the Contractor and prominently posted at the job site. Emergency planning and procedures shall include:

- Planning shall include consideration of fire, explosion, electrical, slip, trip, fall, confined space, and heat hazards.
- Procedures to ensure that all persons entering the work area have read the procedures and understand the project site layout and location of emergency exits and equipment.
- The layout of barriers and equipment designed not to impede with emergency response capabilities.
- Emergency telephone numbers and locations of nearest emergency facilities posted for all workers to see easily.
- Evacuation procedures written and posted with the signatures of all workers to acknowledge their receipt of training in such procedures.

1.13. Fire Protection

The Contractor shall implement the following fire protection policies and procedures.

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

B. Wood used to construct containments shall be pressure treated and certified as fire retardant.

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

D. All combustible waste shall be properly disposed of at the end of each working day.

E. The Contractor shall maintain a minimum of one 4A/60BC dry-chemical extinguisher at each corner of the work area. Where no clear corners exist, four extinguishers shall be placed equidistance around the exterior walls of the work area. The Contractor shall ensure site personnel are aware of the locations and use of the extinguishers and other fire safety equipment.

F. Existing fire alarms, fire detection systems, connections, and standpipes in working condition shall remain active during abatement activities. The Owner's Representative must approve any modification to this equipment.

G. The Contractor shall conduct work in accordance with all requirements of the local fire department.

2. ASBESTOS ABATEMENT

This Work Plan provides general guidelines for removal of asbestos from the site building prior to demolition. The locations and quantities of ACMs and ACCMs identified in the site building are summarized in the Asbestos Survey Report (Ardent, 2011a, Appendix A) and Tables 1 and 2. The Contractor is responsible to know the applicable regulations governing its work and to use the appropriate guidelines based on the survey results. If suspect asbestos-containing materials that have not been previously tested are discovered, the Contractor shall not disturb the material and immediately notify the Owner's Representative.

2.1. Notifications

The Contractor shall make written notifications to the following agencies.

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

- 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.

2.2. General

A. All work shall be supervised by persons trained, knowledgeable, and qualified in the techniques of asbestos abatement, the handling of ACM, ACCM, ad asbestos waste, and the cleaning of asbestos contaminated areas.

B. The Contractor shall furnish all labor, materials, and equipment which is specified, needed, or implied for the removal, transport, and disposal of the identified ACM and ACCM (Tables 1 and 2).

C. At no time shall the identified or otherwise suspect ACMs or ACCMs be drilled, cut, sanded, scraped, or otherwise disturbed by untrained persons. These materials shall be removed by the Contractor prior to any activity which will disturb them. Asbestos removal must be conducted by a Cal/OSHA-registered and State licensed asbestos removal contractor. Abatement operations shall be performed under the direct observation of a Certified Asbestos consultant (CAC) or Site Surveillance Technician (SST) provided by the Owner's Representative.

D. The Contractor shall removal and dispose of all ACMs, ACCMs, and presumed ACMs (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.

E. Eating, smoking, or applying cosmetics shall not be permitted in the work areas.

2.3. Material and Equipment

The Contractor shall adhere to the following practices and specifications regarding materials and equipment, as applicable.

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

B. Polyethylene sheeting utilized for worker decontamination and barriers shall be a minimum of 4-mil or 6-mil thick, depending on use.

C. Disposal bags shall be double 6 mil polyethylene preprinted with labels as required by 40 CFR 61.152 (b)(i)(iv), Title 8 CCR Section 5208, and Title 22 CCR Section 66505, as applicable.

D. The Contractor shall provide warning signs and labels conforming to 40 CFR 763, 29 CFR 1926.1101, and Title 8 CCR 1529 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.

E. Wetting agent (amended water) shall be a 50/50 mixture of polyoxyethylene ether and polyoxyethylene ester, or equivalent, mixed in proportion of 1 fluid ounce to 5 gallons water.

F. Encapsulating agents shall not be flammable and shall not be solvent-based or hydrocarbon-based.

G. 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.

H. 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.

I. Type B powered air-purifying respirators (PAPR) shall be utilized during removal of friable ACMs, at a minimum.

J. Respirators with dual HEPA and organic cartridges shall be utilized when workers are exposed to organic vapors (roofing removal, mastic removal with solvents, etc.)

K. The Contractor shall provide workers and visitors exposed to asbestos with disposable "non-breathable" whole-body outer protective clothing, head coverings, gloves, and foot coverings in sizes adequate to accommodate movement without tearing.

L. The Contractor shall provide workers and visitors additional safety equipment; hard hats, eye protection, safety shoes, had protection, hearing protection, and body protection that meet the requirements of Title 8 CCR Sections 1514 through 1522.

M.Protective outerware shall be adequately sealed at the wrist, ankle, and neck to prevent body contamination.

N. 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 2.7.

O. 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 negative pressure enclosures. Exhaust and air filtration equipment shall be operated 24 hours per day until the asbestos control area is removed, shall be leak proof to the filter, equipped with HEPA filters, and operated in accordance with ANSI Z9.2-79 and EPA guidance document 560/5-83-002. 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 whenever possible. Local exhaust equipment shall be permitted with SCAQMD.

P. 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.

2.4. Pre-Asbestos Removal Preparation

Prior to initiating asbestos-containing material removal, the Contractor shall prepare the work area.

A. Block and seal all openings where the release of airborne asbestos fibers may occur with two layers of 6-mil polyethylene sheeting and tape.

B. Shut down and lock out all heating, ventilation, and air conditioning (HVAC) components that supply or pass through the work area. The HVAC systems shall remain off for the duration of the project.

C. Shut down and lock out electric power to all work areas. The Contractor shall provide safe temporary power (if needed) and lighting sources in compliance with applicable electrical code and Cal/OSHA requirements, and protect each circuit with a Ground Fault Circuit Interrupter (GFCI). Temporary power shall provide 150% of the maximum capacity of all Contractor's and owner's Representative equipment.

D. Install worker decontamination unit as described in Section 2.7.

E. Pre-clean all horizontal and vertical surfaces in the work areas using HEPA-filtered vacuum and/or wet cleaning methods. The Contractor shall not use methods that would raise dust such as dry sweeping or vacuuming with non-HEPA-filtered equipment. The Contractor shall not disturb asbestos-containing materials during pre-cleaning.

F. Establish a negative pressure enclosure with the use of curtains, portable partitions, or other enclosures in order to prevent the escape of asbestos fibers from the work area. Negative pressure enclosure 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. 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.

2.5. Postings

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

B. The Contractor shall post warning signs meeting the specifications of Title 8 CCR 1529 and 29 CFR 1926.1101 at all locations and approaches to locations where the airborne asbestos fiber concentration may exceed background levels and/or the permissible exposure limit (PEL).

C. Additional postings shall include:

- Visitor Entry and Exit Log,
- Employee Daily Sign-in Log,
- Entry and Exit Procedures,
- Emergency Procedures,
- Copies of required permits and notifications, and
- As required by the Department of Labor.

2.6. Asbestos Removal Procedures

A. Asbestos handlers and workers shall don personal protective clothing and equipment and respiratory protective equipment as required in Section 2.3.

B. Thoroughly wet materials to be removed with amended water. Spray material continuously during the removal process to maintain wet conditions.

C. Manually remove asbestos-containing material by prying, cutting, or scraping material from substrate in a manner that will minimize pulverizing, breaking, or abrading.

2.7. Worker Decontamination Systems

A. Worker decontamination areas shall be provided at all locations where workers enter or exit the work area.

B. The Contractor shall provide a temporary, negative pressure unit with a separate decontamination "dirty" room and clean room with a shower in-between for personnel required to wear whole-body protective clothing.

C. Decontamination enclosures shall use 6-mil black or opaque polyethylene sheeting for privacy.

D. Alternative decontamination facilities or methods may be utilized with prior approval and written authorization from the Owner's Representative.

E. The decontamination "dirty" room shall be used for storage of equipment, tools, and re-usable clothing at the end of a shift after they have been decontaminated using a HEPA filtered vacuum and/or wet cleaning techniques. A labeled 6-mil polyethylene disposal bag for collection of disposable clothing shall be located in the dirty room.

F. HEPA vacuum and remove asbestos-contaminated disposable protective clothing while still wearing respirators at the boundary of the dirty room and shower room and seal in impermeable bags or containers for disposal.

G. Workers shall not wear work clothing between work and home.

H. 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.

I. Keep street clothing and street shoes in the clean room lockers.

2.8. 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.

2.9. Clean-up Procedures

A. The Contractor shall maintain surfaces of the work area free of accumulations of dust and debris. Do not blow down the work area with compressed air.

B. Remove and containerize all visible accumulations of asbestos-containing material and contaminated debris utilizing rubber dustpans and squeegees.

C. 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.

D. After cleaning, surfaces shall appear free of visible material. Prior to the clearance inspection, 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.

E. The decontamination enclosure system shall remain in-place and operable during clean-up and clearance inspection.

F. The Contractor shall dispose of filters as asbestos-contaminated materials.

G. 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.

2.10. Clearance Inspection and Reestablishment of Work Areas

A. Reestablishment of the work areas shall only occur after the completion of clean-up procedures and clearance inspection and air monitoring has been performed to the satisfaction of the Owner's Representative.

B. Polyethylene barriers shall be removed from walls, ceilings, and floors, maintaining decontamination systems and critical barriers over doors, windows, HVAC systems, etc.

C. The Owner's Representative will visually inspect all surfaces within the enclosure for residual material or accumulated dust or debris, prior to encapsulating activities, as applicable. The visual inspection will:

- Verify that visible asbestos debris is not present in any of the work areas or adjacent to the work areas. The Contractor shall re-clean all areas showing dust or residual materials.

- Verify that all work was completed as specified.

D. As applicable for interior containments, final clearance air sampling will be conducted by the Owner's Representative. 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 re-clean until acceptable levels are met.

E. When clearance inspections and air sampling are completed satisfactorily, the Owner's Representative will attest that the area is safe in writing before warning signs, negative pressure, and critical barriers can be removed.

F. Reestablish mechanical and electrical systems in pre-work condition, if required.

2.11. Disposal Procedures

A. The Contractor shall collect asbestos-containing waste material (ACWM), asbestos-contaminated water, scrap, debris, bags, containers, equipment, and asbestos-contaminated clothing and place these items in sealed fiber-proof, waterproof, transparent, leak-tight containers (e.g. double bagged or wrapped in 6-mil plastic, cartons, drums, or cans). Wastes within the bags and 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 con-

tainer or use 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 waste 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 ACWM at a State-certified 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.

F. The Contractor will be responsible for obtaining and completing all relevant permits, licenses, manifests, etc. for hazardous waste disposal on behalf of the Owner. Manifests and other forms requiring signature by the generator will be signed by the Owner's Representative.

G. Waste shipment records, hazardous waste manifests, and disposal receipts signed and dated by an agent of the landfill or receiving facility, certifying the amount of waste materials shall be delivered to the Owner's Representative within three working days after delivery to the disposal facility.

2.12. Alternative Procedures

A. If procedures presented in this Work Plan 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.

C. Alternative procedures must be approved in writing by the Owner's Representative prior to the implementation of the procedure.

2.13. Environmental Monitoring

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

A. Pre-abatement (background) air monitoring to determine ambient air asbestos fiber levels prior to abatement.

B. Daily area air monitoring during abatement to determine asbestos contaminant levels inside and outside of containment areas.

C. Environmental air sampling taken outside the containment on each shift to assess fiber migration from the containment area to the environment. Should any environmental sample exceed 0.01 f/cc or pre-established background level, all work will be immediately stopped, except for corrective work. The Owner's Representative will assess the source of the environmental contamination and notify the Contractor with directions for corrective action.

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

Based on the findings of the Lead Testing Services Report (Winzler & Kelly, 2011, Appendix A), lead-containing substances are present at the site building. At present there is no state or federal regulation requiring lead removal or abatement prior to disturbance or demolition of structures with lead-containing substances. However, there are applicable Cal/OSHA worker protection and training requirements; Cal/EPA waste disposal requirements, California Department of Public Health (CDPH) requirements for public and residential buildings, and Senate Bill 460 lead hazard regulations that apply to lead-related construction activities and associated wastes.

3.1. Notifications

Written notification to Cal/OSHA is required for LBP activities involving more than 100 square feet or linear feet of removal in accordance with Title 8 CCR Section 1532.1. Notification to CDPH may be required, depending on the nature of the work.

3.2. General

A. All work shall be supervised by persons trained, knowledgeable, and qualified in the techniques of lead removal, stabilization, and handling of LBP, LBS, LCSCs, and lead waste, and the cleaning of asbestos contaminated areas.

B. The Contractor shall furnish all labor, materials, equipment, disposal, and waste characterization which is specified, needed, or implied for the removal of lead-containing substances (Table 3).

3.3. Material and Equipment

The Contractor shall adhere to the following practices and specifications regarding materials and equipment, as applicable.

A. Polyethylene sheeting utilized for worker decontamination and barriers shall be a minimum of or 6-mil thick.

B. Disposal bags shall be double 6-mil polyethylene preprinted with labels as required by Title 8 CCR Section 1532.1, and Title 22 CCR Section 66505, as applicable.

C. The Contractor shall provide warning signs and labels conforming to EPA, California Department of Transportation (DOT), and Cal/OSHA at all regulated work areas and on all waste containers.

D. The Contractor shall provide respirators to abatement workers selected from those approved by NIOSH for lead-contaminated atmospheres.

E. The Contractor shall provide workers and visitors exposed to lead dust with disposable whole-body outer protective clothing, head coverings, gloves, and foot coverings in sizes adequate to accommodate movement without tearing.

F. The Contractor shall provide workers and visitors additional safety equipment; hard hats, eye protection, safety shoes, had protection, hearing protection, and body protection that meet the requirements of Title 8 CCR Sections 1500-1938 and 3300-3416.

G. 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 lead unless the tools are equipped with effective, integral HEPA-filtered exhaust ventilation systems. Remove all residual lead from reusable tools prior to storage or reuse.

3.4. Lead Removal Preparation

Prior to initiating lead removal, the Contractor shall prepare the work area.

A. Provide all workers a clean changing and wash area, including soap, clean water, and towels.

B. Pre-clean areas around loose or peeling paint using a HEPA-filtered vacuum and/or wet cleaning with non-phosphate detergent. The Contractor shall not use methods that would raise dust such as dry sweeping or vacuuming with non-HEPA-filtered equipment. The Contractor shall not disturb LBP or LCSC during pre-cleaning.

C. Cover floors directly under areas planned for lead removal with one layer of 6-mil polyethylene sheeting extending at least 5 feet in each direction from interior removal areas

and 10 feet out from building foundation for exterior areas (add one foot per foot above 10 feet).

D. Establish a controlled work area by cordoning off the work area with warning table bearing bold, 2-inch lettering stating: "CAUTION - LEAD HAZARD - DO NOT ENTER WORK AREA UNLESS AUTHORIZED."

E. Install remote lead worker decontamination unit as required in Section 3.7.

3.5. Postings

A. The Contractor shall post in the worker decontamination area a list containing the names and telephone numbers of the Owner, Construction Manager, Abatement Contractor, Owner's Representative, and all persons authorized to enter the work area.

B. The Contractor shall post warning signs at all locations and approaches to locations where the airborne lead particle concentration may exceed background levels and/or the permissible exposure limit (PEL).

C. Additional postings shall include:

- Visitor Entry and Exit Log,
- Employee Daily Sign-in Log,
- Entry and Exit Procedures,
- Emergency Procedures,
- Copies of required permits and notifications, and
- As required by the Department of Labor.

3.6. Lead Removal Procedures

A. Lead handlers and workers shall don personal protective clothing and equipment and respiratory protective equipment as required in Section 3.3.

B. LBP shall be stabilized by removal on all surfaces using methods that reduce the amount of airborne lead particles generated by the demolition activities.

C. The flowing removal methods shall not be used:

- Chemical removal that produces liquid waste that is regulated under EPA, RCRA, state and local hazardous waste regulations.
- Burning of lead based paint with an open torch or equivalent method that will generate lead fumes.

- Dry sanding with an electric or air powered sander without HEPA vacuum filtration equipment.
- Uncontained water blasting.

D. Do not perform exterior removal on days when the constant wind speed is 20 miles per hour of greater.

3.7. Worker Decontamination Systems

A. Worker decontamination areas shall be provided at all locations where workers enter or exit the work area.

B. Decontamination enclosures shall use 6-mil black or opaque polyethylene sheeting for privacy.

C. Alternative decontamination facilities or methods may be utilized with prior approval and written authorization from the Owner's Representative.

D. Prior to receipt of negative exposure assessments as required in Title 8 CCR 1532.1, the worker decontamination system shall consist of at least a clean room, wash room, and an equipment room, each separated from each other and the work area by airlocks.

E. Clean rooms shall be sized adequately to accommodate the work crew and include space for storing respirators. Clean work clothes, replacement filters for respirators, towels and other necessary items shall be provided in the clean room.

F. Wash rooms shall contain one or more wash basins with an adequate supply of soap, clean water, and towels at all times.

G. The equipment room shall be used for storage of equipment, tools, and reusable clothing at the end of a shift after they have been decontaminated using a HEPA filtered vacuum and/or wet cleaning techniques. A labeled 6-mil polyethylene disposal bag for collection of disposable clothing shall be located in the equipment room.

3.8. OSHA Personnel Monitoring

The Contractor is responsible for conducting daily OSHA compliance personal air monitoring as required by 29 CFR 1926.62 and Title 8 CCR 1532.1. Results shall be provided to the Owner's Representative.

- The Contractor shall conduct breathing zone air monitoring of each different job category/task. The breathing zone shall be and area within a hemisphere, forward of the shoulders, with a radius of 6 to 9 inches from the center at the nose or mouth of a worker.

- Monitoring shall be conducted by a qualified person knowledgeable of the methods of air monitoring in accordance with 29 CFR 1926.62 and Title 8 CCR 1532.1.

3.9. Clean-up Procedures

After lead-related work activities have been completed, the Contractor shall clean all identified surfaces and remove and settled lead dust or debris. The following procedures shall be used.

A. HEPA vacuum all surfaces in the work area.

B. Clean all surfaces in the work area with non-phosphate detergent solution. Cleaning shall start at the ceiling or upper portion of the work area and work down to the floor.

C. Place all contaminated cleaning supplies and wastes in sealed plastic bags for later disposal in steel drums.

D. After the surfaces have dried, HEPA vacuum the surfaces a second time until no dust or residue can be seen.

3.10. Clearance Inspection

Two clearance inspections shall be conducted by the Owner's Representative with the assistance of the Contractor.

1. A visual inspection after all lead work is completed to assure that all required lead-containing substances have been removed or stabilized. The inspection will occur a minimum of 24 hours after wet methods have been used to assure that delamination caused by water has not occurred.

2. After the final cleanup of the work area, a visual inspection and dust-wipe clearance sampling will be conducted by the Owner's Representative. Dust wipe clearance criteria are:
   - Interior Floors – 40 micrograms per square foot (ug/ft^2)
   - Interior Window Surfaces/Sills – 250 ug/ft^2
   - Exterior Horizontal Window Troughs and Floors – 400 ug/ft^2

3.11. Disposal Procedures

A. All disposable clothing, respirator cartridges, and HEPA vacuum filters shall be disposed of in sealed plastic bags upon completion of each work shift and when the lead removal operation has been completed.

B. All removed lead-contaminated clothing and equipment, and lead-containing dust and debris shall be placed into DOT approved 55-gallon drums.

C. Waste streams shall be segregated for required disposal profile testing. Contractor is responsible for testing waste materials in accordance with all Federal, State and local laws.

D. Contractor must separate non-hazardous waste from hazardous waste.

E. The Contractor shall test all waste water prior to release into the sanitary sewer or storm drain.

F. Lead-contaminated waste shall be characterized by performing Total Threshold Limit Concentration (TTLC), Soluble Threshold Limit Concentration (STLC), and/or Toxicity Characteristic Leaching Potential (TCLP) tests prior to disposal. STLC or TCLP results indicating 5 parts per million or more shall be disposed of as RCRA regulated hazardous waste.

G. Copies of testing results shall be provided to the Owner's Representative.

H. Each drum shall be labeled to identify the type of waste in accordance with 49 CFR 172 and the date wastes were first put into the drum.

I. The Contractor shall make provisions for the safe storage of waste on-site for waste characterization and eventual disposal. Waste storage areas must be treated as lead control areas with restricted access.

J. The Contractor will be responsible for obtaining and completing all relevant permits, licenses, manifests, etc. for hazardous waste disposal on behalf of the Owner. Manifests and other forms requiring signature by the generator will be signed by the Owner's Representative.

K. Waste shipment records, hazardous waste manifests, and disposal receipts signed and dated by an agent of the landfill or receiving facility, certifying the amount of waste materials shall be delivered to the Owner's Representative within three working days after delivery to the disposal facility.

3.12. Alternative Procedures

A. If procedures presented in this Work Plan 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.

C. Alternative procedures must be approved in writing by the Owner's Representative prior to the implementation of the procedure.

3.13. Environmental Monitoring

The Owner and/or Owner's Representative my, at its discretion, perform environmental air, soil, dust, and water sampling for lead. The Contractor shall control levels of lead outside the work areas so that environmental levels do not exceed background levels.

4. CONTAMINATED SOIL EXCAVATION (IF NEEDED)

Based on the results of previous subsurface investigations at the site, there is no known 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 one working day. The Owner's Representative will perform sampling and analysis as needed to assess the nature and extent of the contamination. If the excavation and disposal of any such contaminated soil is desired by the Owner, 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 1166 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 and compacted in accordance with the requirements of the Project Specifications using borrowed material from the site and/or clean imported soil, as directed by the City Engineer. Backfill operations shall be carried out in compliance with applicable Building Code requirements. Backfill compaction testing will be provided by the Owner's Representative.

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.

4.1. Notifications

The Contractor shall make required written notifications, including notifications to the Owner's Representative and the following agency.

- 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.

5. UNIVERSAL WASTES

Estimated quantities of universal wastes at the site are summarized in Table 4.

A. All fluorescent light tubes and other mercury vapor lamps 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-PCBs" 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 Work Plan, 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.

Table 1 – Asbestos-Containing Material (ACM) (greater than 1% asbestos content)

Description	Location		Quantity	Condition
	Building	Rooms		
Gray Roof Mastic	F	Roof	30 sf	Good/Non-Friable
SF = square feet Building and room number locations are shown in Figures 3 & 4 of the Asbestos Survey Report (Appendix A)				

Table 2 – Asbestos-Containing Construction Material (ACCM)
(less than 1% and greater than 0.1% asbestos content)

Description	Location	Quantity	Condition
None			
SF = square feet Building and room number locations are shown in Figures 3 & 4 of the Asbestos Survey Report (Appendix A)			

Table 3 – Lead-Based Paint and Lead-Bearing Substances

Feature (color/substrate/component)	Location	Quantity	Condition
Yellow/Metal/Post	Building 1 (A) – Exterior at former UST location	2 Each	Intact
Red/Metal/Fire Hydrant	Building 1 (A) – Exterior at former UST location	1 Each	Intact
Yellow/Metal/Post	Building 6 (F) - Exterior	6 Each	Intact
Locations are shown in Figure 1 in the attached Lead Testing Services Report (Appendix A). SF – square feet LF – linear feet Intact – Paint or substance generally in good condition. Fair – Paint generally intact with minor wear and tear. Poor – Paint not intact, severely worn or damaged, or chalking.			

Table 4 – Universal Wastes/Miscellaneous Materials

Feature	Possible Hazardous Component	Location	Total Estimated Quantity
Fluorescent Light Tubes	Mercury	Bldg. A – Office	136 – 4 ft long
Air Conditioning Units	Freon or CFC gases	Bldg. A – Roof	2
Thermostat Switches	Mercury	Bldg. A - Office	2
Exit Signs and Thermostats	Batteries	Bldg. A - Office	2

CFC – Chlorofluorocarbons

APPENDIX A

HAZARDOUS BUILDING MATERIAL SURVEY REPORTS

WINZLER & KELLY

PRE-DEMOLITION
LEAD TESTING SERVICES REPORT

Project Site:

Former Lumber Yard
14624 East Nelson Avenue
City of Industry, California 91744

Prepared For:

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ARDENT ENVIRONMENTAL GROUP, INC.
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W&K Project Number: 1156011008.77010

November 9, 2011

WINZLER & KELLY

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PRE-DEMOLITION LEAD TESTING SERVICES REPORT

SECTION 1

EXECUTIVE SUMMARY

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 a former lumber yard located at 14624 East Nelson 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 ***were*** encountered during the survey and testing activities. ***There was no access to the restroom at Building 6 and the cell tower compound, and therefore, was not tested.*** 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 site. The following table list the hazardous materials identified within the subject site, including the location and the estimated total quantity of the identified hazardous materials:

FORMER LUMBER YARD
14624 EAST NELSON AVENUE
CITY OF INDUSTRY

MATERIAL/COMPONENT DESCRIPTION	LOCATION	CONDITION	ESTIMATED TOTAL QUANTITY (SF/LF/EA)
Lead-Based Paints (Color/Substrate/Component):			
Yellow/Metal/Post	Former UST location	Intact	2 EA
Red/Metal/Fire Hydrant	Former UST location	Intact	1 EA
Yellow/Metal/Post	Building 6	Fair	6 EA

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, 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:

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Project Manager
CDPH Lead Inspector-Assessor/Project Monitor #13938
Registered Environmental Assessor I #08323

Report reviewed and signed for Ardent by:

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Environmental Service Line Manager
CDPH Lead Inspector-Assessor #5809

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 a former lumber yard located at 14624 East Nelson 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 October 27, 2011 by Mr. Steve Pitts and Mr. Mike Toomey. Mr. Stephen Reese performed report preparation and project management, and Mr. Jerry Sherman performed report review. All members of the survey team are employees of Winzler & Kelly, are California Department of Public Health (CDPH)-Certified Lead-Related Inspectors/Risk Assessors, and have received Hazardous Waste Operations and Emergency Response (HAZWOPER) training in accordance with 8 California Code of Regulations (CCR) 5194. Mr. Reese is also a CDPH-Certified Lead Project Monitor. Copies of certifications can be found in Appendix A.

Building Description

The survey and testing was conducted at a former lumber yard located at 14624 East Nelson Avenue in the City of Industry, County of Los Angeles, California. The site consists of 8 buildings/structures in which one building was an office of approximately 2,400 square feet in size, and the other structures were lumber yard storage structures. The building and structures were either wood-frame and/or metal-frame that consisted of floors finished with vinyl tile, carpet or sheet flooring; interior walls finished with wallboard (drywall)/joint compound; interior ceilings finished with drywall/joint compound or acoustic panels; and/or roofs consisted of built-up roofing materials.

Physical limitations ***were*** encountered during the survey and testing activities. ***There was no access to the restroom at Building 6 and the cell tower compound, and therefore, was not tested.*** 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 108 XRF measurements (with calibration readings) for the determination of lead content were collected from the subject site building on October 27, 2011. 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):

14624 East Nelson Avenue

1. Yellow/Metal/Post
2. Red/Metal/Fire Hydrant
3. Yellow/Metal/Post

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, 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 cannot be exposed above the action level during any process, operation, or activity) the analysis of bulk or surface samples cannot 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.

APPENDIX A

CERTIFICATIONS

State of California Department of Public Health

Lead Related Construction Certificate	Certificate Type	Expiration Date
	Inspector/Assessor	01/07/2012

Mr. Jerry R. Sherman
1829 Mendota Street
San Diego, California 92106

Jerry R. Sherman ID #: 5809

Mr. Stephen S. Reese
Winzler & Kelly
3750 Convoy Street Suite 220
San Diego, California 92111

State of California Department of Public Health

Lead-Related Construction Certificate	Certificate Type	Expiration Date
	Inspector/Assessor	11/25/2011
	Project Monitor	11/25/2011

Stephen S. Reese

ID #: 13938

State of California Department of Public Health

Lead-Related Construction Certificate	Certificate Type	Expiration Date
	Inspector/Assessor	05/11/2012

Michael F. Toomey ID#: 21344

State of California Department of Public Health

Lead-Related Construction Certificate	Certificate Type	Expiration Date
	Inspector/Assessor ★	05/12/2012

Steve G. Pitts ID #: 15644

APPENDIX B

LEAD TESTING MAP

ARDENT
ENVIRONMENTAL
GROUP, INC.

ASBESTOS SURVEY
14624 NELSON AVENUE
CITY OF INDUSTRY, CALIFORNIA

PREPARED FOR
City of Industry
15625 East Stafford Street, Suite 100
City of Industry, California 91744

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

December 9, 2011
Project No. 100260003

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

1141 Pomona Road, Suite E
Corona, California 92882

ARDENT
ENVIRONMENTAL
GROUP, INC.

December 9, 2011
Project No. 100260003

Mr. Kevin Radecki
City of Industry
15625 East Stafford Street, Suite 100
City of Industry, California 91744

Subject: Asbestos Survey
14624 Nelson 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 buildings located at 14624 Nelson 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.
Certified Asbestos Consultant #08-4421

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

CM/PAR/paw

Distribution: (1)Addressee
(1)Mr. Dale Masl, CNC Engineering, Inc.

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 buildings located at 14624 Nelson Avenue, City of Industry, California (site). This report has been prepared for the City of Industry (City) in general accordance with contract number 1-ARDENT 11-01 MP 10-07.

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 buildings 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 14624 Nelson Avenue in the City of Industry, Los Angeles County, California (Figure 1). The site is located on the southern side of Nelson Avenue, approximately 200 feet southeast of the intersection of Sunset Avenue and Nelson Avenue. The site has been assigned the Tax Assessor's Parcel Number (APN) 8208-006-902 and contains seven commercial buildings.

The site consists of a flag-shaped property comprising approximately 4.13 acres. The site is currently vacant and contains one approximately 2,400 square foot office building and six lumber storage canopy structures (Figure 2). The buildings were constructed in 1982. The site buildings are of wood frame construction. Floors are generally unfinished concrete except in the office which has floors finished with carpet, wood, and vinyl floor tiles. Ceilings are unfinished or are finished with suspended 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 29 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.
- Preparation of this report.

5. ASBESTOS SURVEY METHODS

The asbestos survey was performed between November 15, 2011 and November 21, 2011. 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 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 29 bulk samples were collected from the site buildings. Bulk sample descriptions are summarized in Table 2 and locations are shown in Figures 3 and 4.

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.

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 laboratory reports are presented as Attachment A. The laboratory results are summarized in Table 2.

7. DISCUSSION OF RESULTS AND CONCLUSIONS

A total of 29 samples were collected by Ardent and analyzed by the laboratory for asbestos content. Based on the inspection and laboratory results, the following materials were found to contain detectable concentrations of greater than 1 percent of asbestos (ACMs) or greater than 0.1 percent but less than or equal to 1 percent asbestos (ACCMs):

DETECTED ACMs (greater than 1% asbestos content)

HA	Description	Location		Quantity	Condition
		Building	Rooms/Location		
K	Gray Roof Mastic	F	Roof	30 sf	Good/Non-Friable

HA = Homogeneous Area (see Table 1)
sf = square feet
Building and room number locations are shown in Figures 3 & 4

DETECTED ACCMs (greater than 0.1% but less than or equal to 1% asbestos)

HA	Description	Location	Quantity	Condition
	None			

HA = Homogeneous Area (see Table 1)

8. RECOMMENDATIONS

The results of the asbestos survey indicate that ACMs are present at the site building. The EPA specifies that ACM and ACCM classified as friable, or that could become friable during demolition, is to be removed prior to demolition activities. According to the EPA, nonfriable ACM or ACCM represents a minimal hazard to the occupants of a building as long as the material is in a generally undamaged condition and used for its intended purpose. In addition, the National Emission Standards for Hazardous Air Pollutants (NESHAPs) require that both friable and nonfriable ACM and ACCM that could become friable be removed prior to renovation or demolition of buildings.

At no time should the identified ACMs or ACCMs be drilled, cut, sanded, scraped, or otherwise disturbed by untrained personnel. These materials should be removed prior to any activities which will impact these materials. Asbestos disturbance and/or removal must be conducted by a California DOSH registered and State licensed asbestos removal contractor. Disturbance and/or abatement operations should be performed under the direct observation of a California Certified Asbestos Consultant or Certified Site Surveillance Technician.

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	Building	Location(s)
A	Drywall and Joint Compound	A	Throughout
B	Yellow Mastic Behind Black Cove Base	A	Throughout
C	2'x4' Suspended Ceiling Tile	A	Throughout
D	Gray 12"x12" Floor Tile with White Mastic	A	Rooms 3, 4, 5, & 6
E	Tan Mastic Behind Wainscot	A	Rooms 5 & 6
F	Yellow Mirrow Mastic	A	Rooms 5 & 6
G	Yellow Carpet Mastic	A	Throughout
H	White & Gray 12"x12" Floor Tile with Yellow Mastic	A	Rooms 3, 4, 5, & 6
I	Layered Roof Core	B, C, D, E, F, & G	Roof
J	Composition Shingle Roof	A	Roof
K	Gray Roof Mastic	F	Roof - Patches
L	Layered Roof Core Patch	F	Roof - Northeast Corner

Note: Locations of buildings and room numbers are shown in Figures 2 and 3.

TABLE 2 - ASBESTOS SAMPLE RESULTS

Sample Number	HA Number	Type of Material	Location		Asbestos Content
			Building	Room	
1	A	Drywall & Joint Compound	A	Room 12	Joint Compound = ND Drywall = ND
2	A	Drywall & Joint Compound	A	Room 8	Joint Compound = ND Drywall = ND
3	A	Drywall & Joint Compound	A	Room 1	Joint Compound = ND Drywall = ND
4	A	Drywall & Joint Compound	A	Room 4	Joint Compound = ND Drywall = ND
5	A	Drywall & Joint Compound	A	Room 5	Joint Compound = ND Drywall = ND
6	B	Yellow Mastic Behind Black cove Base	A	Room 12	ND
7	B	Yellow Mastic Behind Black cove Base	A	Room 2	ND
8	B	Yellow Mastic Behind Black cove Base	A	Room 8	ND
9	C	2'x4' Suspended Ceiling Tile	A	Room 9	ND
10	C	2'x4' Suspended Ceiling Tile	A	Room 12	ND
11	D	Gray 12"x12" Floor Tile with White Mastic	A	Room 4	Floor Tile = ND Mastic = ND
12	D	Gray 12"x12" Floor Tile with White Mastic	A	Room 5	Floor Tile = ND Mastic = ND
13	D & H	Layered 12"x12" Floor Tile and Mastics	A	Room 3	Gray Floor Tile = ND White Mastic = ND White & Gray Floor Tile = ND Yellow Mastic = ND
14	E	Tan Mastic Behind Wainscot	A	Room 6	ND
15	E	Tan Mastic Behind Wainscot	A	Room 5	ND
16	F	Yellow Mirror Mastic	A	Room 5	ND
17	F	Yellow Mirror Mastic	A	Room 6	ND
18	G	Yellow Carpet Mastic	A	Room 7	ND
19	G	Yellow Carpet Mastic	A	Room 12	ND
20	G	Yellow Carpet Mastic	A	Room 1	ND
21	H	White & Gray 12"x12" Floor Tile with Yellow Mastic	A	Room 3	Floor Tile = ND Mastic = ND
22	H	White & Gray 12"x12" Floor Tile with Yellow Mastic	A	Room 24	Floor Tile = ND Mastic = ND

TABLE 2 - ASBESTOS SAMPLE RESULTS

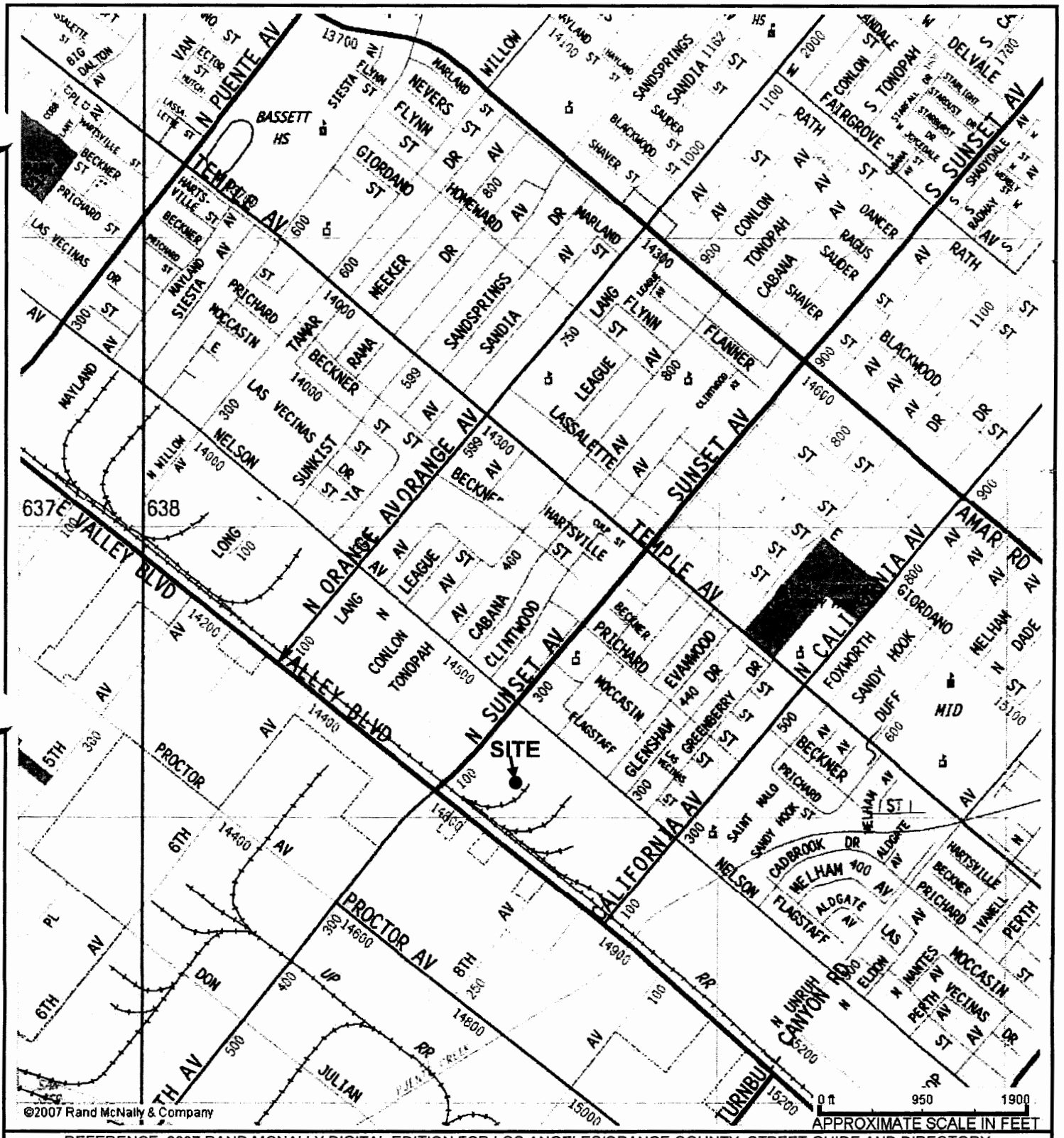
Sample Number	HA Number	Type of Material	Location		Asbestos Content
			Building	Room	
23	I	Layered Roof Core	D	Roof	ND
24	I	Layered Roof Core	F	Roof	ND
25	K	Gray Roof Mastic	F	Roof - Lower Section	**5% Chrysotile**
26	L	Layered Roof Core Patch	F	Roof - Northeast Corner	ND
27	I	Layered Roof Core	F	Roof	ND
28	J	Composite Shingle Roof Core	A	Room 15	ND
29	J	Composite Shingle Roof Core	A	Room 15	ND

Notes:

HA = Homogeneous Area (see Table 1)

ND = Not Detected

Building, room, and sample locations are shown in Figures 2 & 3.

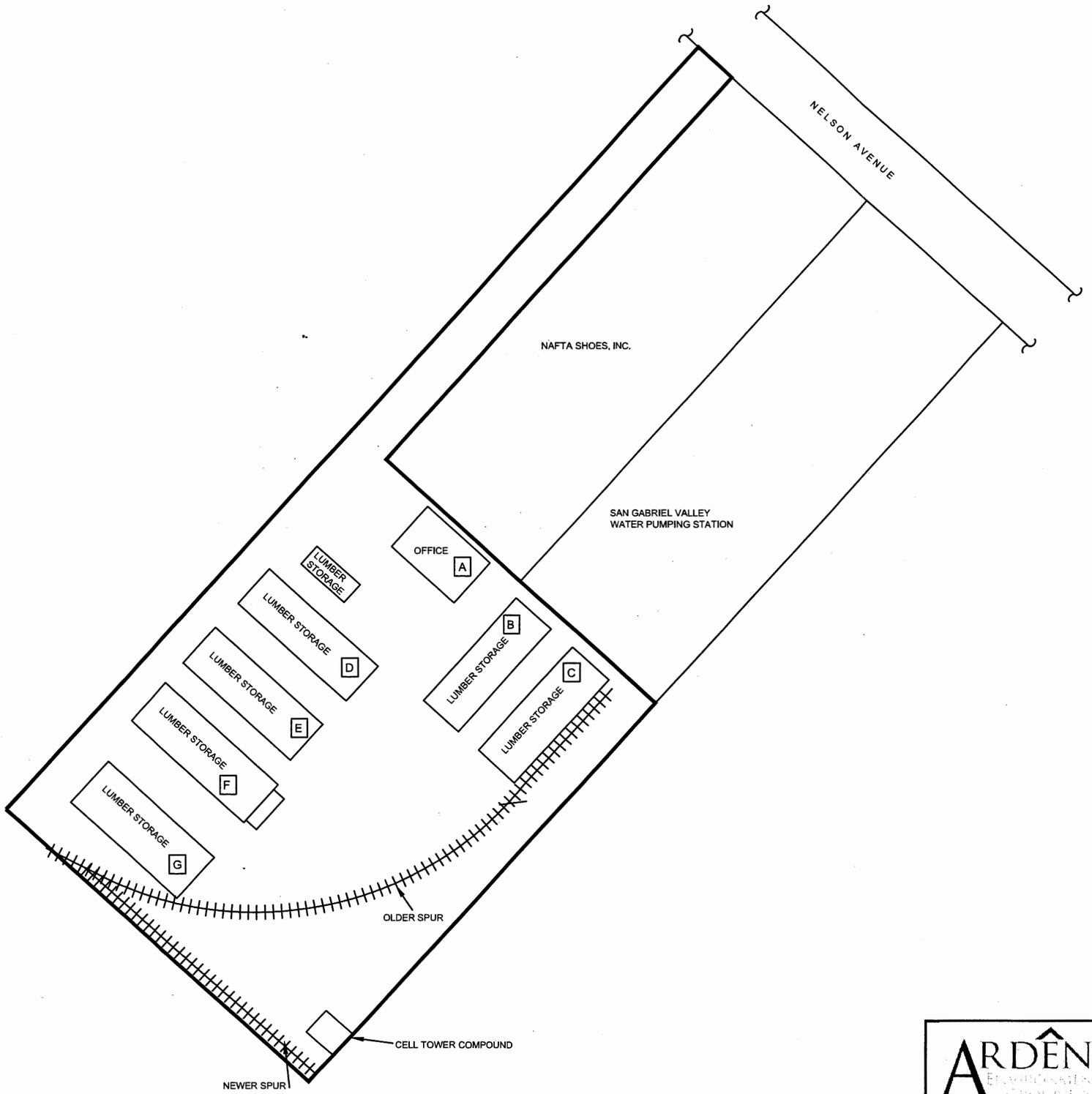


REFERENCE: 2007 RAND MCNALLY DIGITAL EDITION FOR LOS ANGELES/ORANGE COUNTY, STREET GUIDE AND DIRECTORY

N

NOTE: ALL DIMENSIONS, DIRECTIONS, AND LOCATIONS ARE APPROXIMATE

ARDENT ENVIRONMENTAL GROUP, INC.	PROJECT NO. 100260003	**SITE LOCATION MAP**	FIGURE 1
	DATE 11/11	14624 NELSON AVENUE CITY OF INDUSTRY, CALIFORNIA	



LEGEND

- SITE BOUNDARY
- RAILROAD SPUR
- [A] BUILDING DESIGNATIONS

N

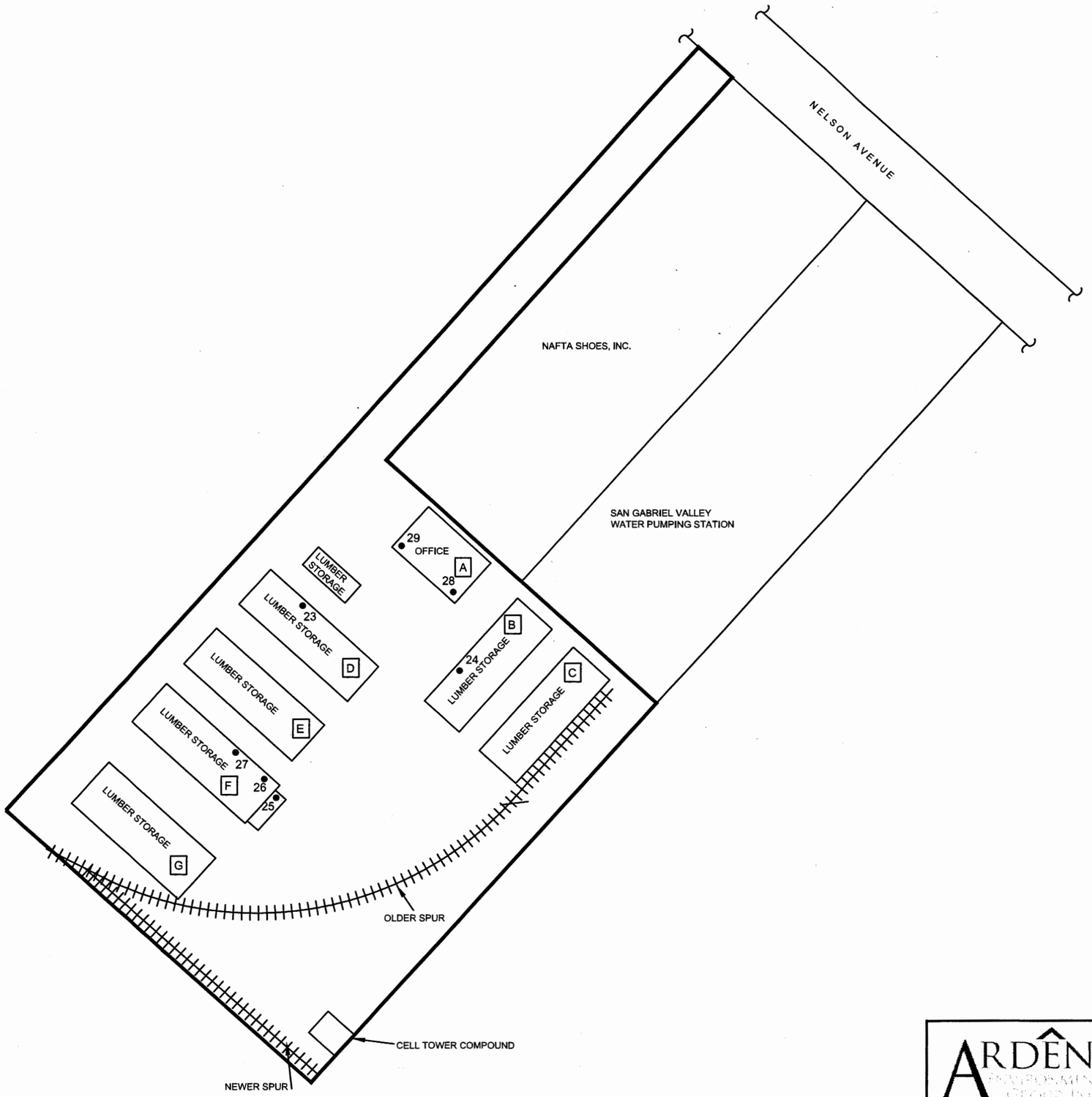
APPROXIMATE SCALE IN FEET

0 50 100

NOTE: ALL DIMENSIONS, DIRECTIONS AND LOCATIONS ARE APPROXIMATE.

ARDENT	PROJECT NO. 100260003	**SITE PLAN**	FIGURE 2
	DATE 12/11	14624 NELSON AVENUE CITY OF INDUSTRY, CALIFORNIA	

MD7XX



LEGEND

- SITE BOUNDARY
- RAILROAD SPUR
- A — BUILDING DESIGNATIONS
- 24 — SAMPLE LOCATIONS

N

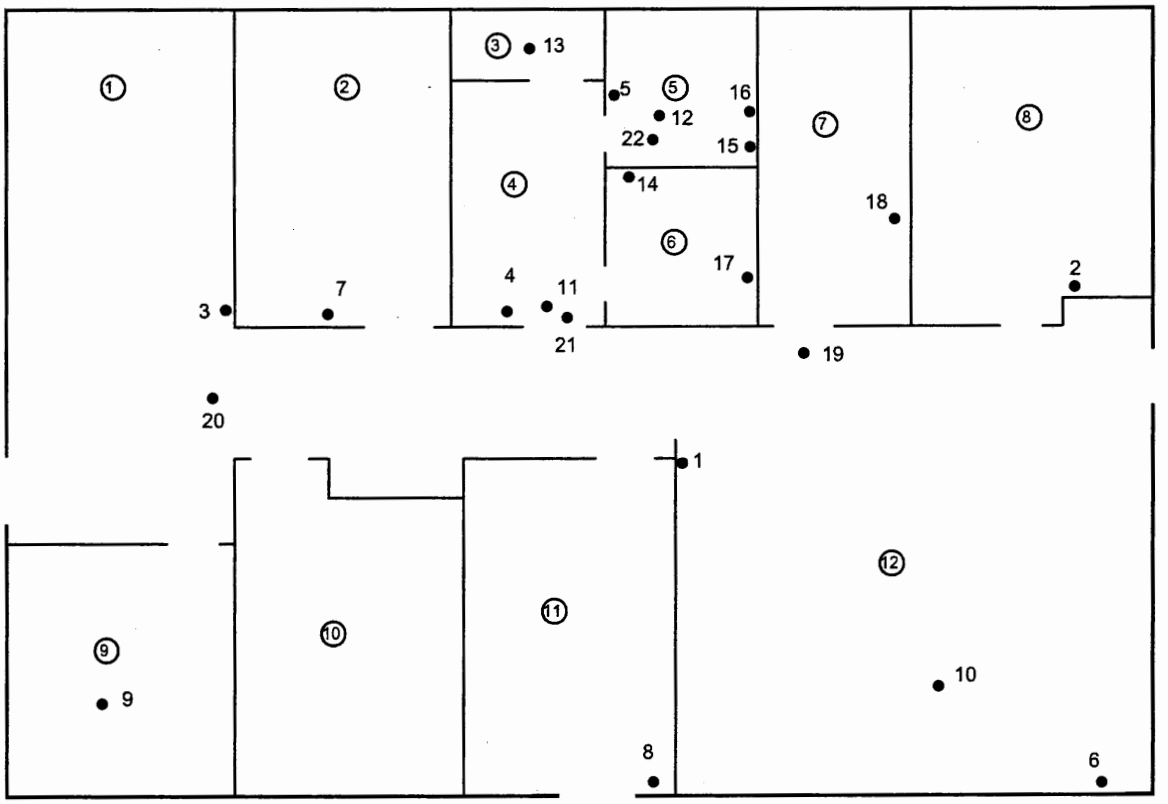
APPROXIMATE SCALE IN FEET

0 50 100

NOTE: ALL DIMENSIONS, DIRECTIONS AND LOCATIONS ARE APPROXIMATE.

XX.DWG

ARDENT ENVIRONMENTAL GROUP, INC.	PROJECT NO. 100260003	**ROOF SAMPLE LOCATIONS**	FIGURE 4
	DATE 12/11	14624 NELSON AVENUE CITY OF INDUSTRY, CALIFORNIA	



LEGEND

① ROOM NUMBER

• 2 SAMPLE LOCATION

N

APPROXIMATE SCALE IN FEET

0 10 20

NOTE: ALL DIMENSIONS, DIRECTIONS AND LOCATIONS ARE APPROXIMATE.

ARDENT ENVIRONMENTAL GROUP, INC.	PROJECT NO. 100260003	**SAMPLE LOCATIONS - BUILDING A**	FIGURE 3
	DATE 12/11	14624 NELSON AVENUE CITY OF INDUSTRY, CALIFORNIA	

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: 100260003; 14624 Nelson
EML ID: 856459

Approved by:

Technical Manager
Miguel Ines

Dates of Analysis:
Asbestos-EPA Method 600/R-93/116: 11-18-2011

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

Document Number: 200091 - Revision Number: 5

EMLab P&K
5555 Garden Grove Blvd., Suite 275, Westminster, CA 92683
(866) 465-6653 Fax (858) 569-5806 www.emlab.com

Client: Ardent Environmental Group, Inc.
C/O: Mr. Craig Metheny
Re: 100260003; 14624 Nelson

Date of Sampling: 11-15-2011
Date of Receipt: 11-16-2011
Date of Report: 11-18-2011

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

Total Samples Submitted:	22
Total Samples Analysed:	22
Total Samples with Layer Asbestos Content > 1%:	0

Location: 1, Drywall and joint compound Lab ID-Version‡: 3799871-1

Sample Layers	Asbestos Content
White Joint Compound with Paint	ND
White Drywall	ND
Composite Non-Asbestos Fibrous Content:	5% Cellulose
Sample Composite Homogeneity:	Moderate

Location: 2, Drywall and joint compound Lab ID-Version‡: 3799872-1

Sample Layers	Asbestos Content
White Joint Compound with Paint	ND
White Drywall	ND
Composite Non-Asbestos Fibrous Content:	5% Cellulose
Sample Composite Homogeneity:	Moderate

Location: 3, Drywall and joint compound Lab ID-Version‡: 3799873-1

Sample Layers	Asbestos Content
White Joint Compound with Paint	ND
White Drywall	ND
Composite Non-Asbestos Fibrous Content:	5% Cellulose
Sample Composite Homogeneity:	Moderate

Location: 4, Drywall and joint compound Lab ID-Version‡: 3799874-1

Sample Layers	Asbestos Content
White Joint Compound with Paint	ND
White Drywall	ND
Composite Non-Asbestos Fibrous Content:	5% Cellulose
Sample Composite Homogeneity:	Moderate

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".

EMLab P&K
5555 Garden Grove Blvd., Suite 275, Westminster, CA 92683
(866) 465-6653 Fax (858) 569-5806 www.emlab.com

Client: Ardent Environmental Group, Inc.
C/O: Mr. Craig Metheny
Re: 100260003; 14624 Nelson

Date of Sampling: 11-15-2011
Date of Receipt: 11-16-2011
Date of Report: 11-18-2011

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

Location: 5, Drywall and joint compound Lab ID-Version‡: 3799875-1

Sample Layers	Asbestos Content
White Joint Compound with Paint	ND
White Drywall	ND
Composite Non-Asbestos Fibrous Content:	5% Cellulose
Sample Composite Homogeneity:	Moderate

Location: 6, Yellow mastic Lab ID-Version‡: 3799876-1

Sample Layers	Asbestos Content
Yellow Mastic	ND
Sample Composite Homogeneity:	Moderate

Location: 7, Yellow mastic Lab ID-Version‡: 3799877-1

Sample Layers	Asbestos Content
Yellow Mastic	ND
Sample Composite Homogeneity:	Moderate

Location: 8, Yellow mastic Lab ID-Version‡: 3799878-1

Sample Layers	Asbestos Content
Yellow Mastic	ND
Sample Composite Homogeneity:	Moderate

Location: 9, 2 x 4 ceiling tile Lab ID-Version‡: 3799879-1

Sample Layers	Asbestos Content
Light Gray Ceiling Tile with White Surface	ND
Composite Non-Asbestos Fibrous Content:	40% Cellulose 30% Mineral Fibers
Sample Composite Homogeneity:	Moderate

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".

EMLab P&K
5555 Garden Grove Blvd., Suite 275, Westminster, CA 92683
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Client: Ardent Environmental Group, Inc.
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Date of Receipt: 11-16-2011
Date of Report: 11-18-2011

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

Location: 10, 2 x 4 ceiling tile Lab ID-Version‡: 3799880-1

Sample Layers	Asbestos Content
Light Gray Ceiling Tile with White Surface	ND
Composite Non-Asbestos Fibrous Content:	40% Cellulose 30% Mineral Fibers
Sample Composite Homogeneity:	Moderate

Location: 11, Gray 12 x 12 VFT and white mastic Lab ID-Version‡: 3799881-1

Sample Layers	Asbestos Content
Gray/Black Floor Tile	ND
Semi-Transparent Mastic	ND
Sample Composite Homogeneity:	Moderate

Location: 12, Gray 12 x 12 VFT and white mastic Lab ID-Version‡: 3799882-1

Sample Layers	Asbestos Content
Gray/Black Floor Tile	ND
Semi-Transparent Mastic	ND
Sample Composite Homogeneity:	Moderate

Location: 13, 2 layers VFT and mastic Lab ID-Version‡: 3799883-1

Sample Layers	Asbestos Content
Gray/Black Floor Tile	ND
Semi-Transparent Mastic (under Gray/Black FT)	ND
Off-White Floor Tile	ND
Yellow Mastic (under Off-White FT)	ND
Sample Composite Homogeneity:	Moderate

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".

EMLab P&K
5555 Garden Grove Blvd., Suite 275, Westminster, CA 92683
(866) 465-6653 Fax (858) 569-5806 www.emlab.com

Client: Ardent Environmental Group, Inc.
C/O: Mr. Craig Metheny
Re: 100260003; 14624 Nelson

Date of Sampling: 11-15-2011
Date of Receipt: 11-16-2011
Date of Report: 11-18-2011

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

Location: 14, Tan mastic Lab ID-Version‡: 3799884-1

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

Location: 15, Tan mastic Lab ID-Version‡: 3799885-1

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

Location: 16, Yellow mastic Lab ID-Version‡: 3799886-1

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

Location: 17, Yellow mastic Lab ID-Version‡: 3799887-1

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

Location: 18, Yellow carpet mastic Lab ID-Version‡: 3799888-1

Sample Layers	Asbestos Content
Yellow Carpet Mastic	ND
Sample Composite Homogeneity:	Moderate

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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5555 Garden Grove Blvd., Suite 275, Westminster, CA 92683
(866) 465-6653 Fax (858) 569-5806 www.emlab.com

Client: Ardent Environmental Group, Inc.
C/O: Mr. Craig Metheny
Re: 100260003; 14624 Nelson

Date of Sampling: 11-15-2011
Date of Receipt: 11-16-2011
Date of Report: 11-18-2011

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

Location: 19, Yellow carpet mastic Lab ID-Version‡: 3799889-1

Sample Layers	Asbestos Content
Yellow Carpet Mastic	ND
Sample Composite Homogeneity:	Moderate

Location: 20, Yellow carpet mastic Lab ID-Version‡: 3799890-1

Sample Layers	Asbestos Content
Yellow Carpet Mastic	ND
Sample Composite Homogeneity:	Moderate

Location: 21, White and gray 12 x12 VFT and yellow mastic Lab ID-Version‡: 3799891-1

Sample Layers	Asbestos Content
Gray/White Floor Tile	ND
Yellow Mastic	ND
Sample Composite Homogeneity:	Moderate

Location: 22, White and gray 12 x12 VFT and yellow mastic Lab ID-Version‡: 3799892-1

Sample Layers	Asbestos Content
Gray/White Floor Tile	ND
Yellow Mastic	ND
Sample Composite Homogeneity:	Moderate

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".

CHAIN OF CUSTODY — EMLab P&K

www.EMLabPK.com

Cherry Hill, NJ: 1936 Olney Avenue, Cherry Hill, NJ 08003 * (866) 871-1984
Phoenix, AZ: 1501 West Knudsen Drive, Phoenix, AZ 85027 * (800) 651-4802
San Bruno, CA: 1150 Bayhill Drive, #100, San Bruno, CA 94066 * (866) 888-6653

Type of Fleck	Fog	Rain	Snow	Wind	Clear
None					
Light					
Moderate					
Heavy					

REQUESTED ANALYSIS

Non-Culturable | Culturable

Spore Trap | Tape Swab Bulk | BioCassette™ Andersen Water, Bulk, Dust, Soil

000856459

CONTACT INFORMATION

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

PROJECT INFORMATION

Project ID: 100260003
Project Desc.: 14624 Nelson
Project Zip Code:
Sampling Date & Time: 11/15/11 9:30
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 12:00pm or on weekends will be considered received the next business day. Please allow us to determine if weekend analysis needs

Sample ID	Description	Sample Type (see below)	TAT (days)	QC (Volume/Area as applicable)	NOTES (Times of day required, 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, 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	2 layers VFT & Mastics	B	STD																		X	
14	Tan Mastic																				X	
15	Tan Mastic																				X	
16	Yellow Mastic																				X	
17	Yellow Mastic																				X	
18	Yellow Carpet Mastic																				X	
19	Yellow Carpet Mastic																				X	
20	Yellow Carpet Mastic																				X	
21	White & Gray 12x12 VFT & Yellow Mastic																				X	
22	White & Gray 12x12 VFT & Yellow Mastic																				X	

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
	11/15/11

RECEIVED BY	DATE & TIME
	11/15/11
	10:37

CHAIN OF CUSTODY — EMLab P&K

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Phoenix, AZ: 1501 West Knudsen Drive, Phoenix, AZ 85027 • (800) 651-4802
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 SER[VICES]

000856459

CONTACT INFORMATION

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

PROJECT INFORMATION

Project ID: 100260 003	
Project Desc.: 14624 Nelson	
Project Zip Code:	Sampling Date & Time: 11/15/11 9:00
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 3pm or on weekends, will be considered received the next business day. Please alert us in advance of weekend analysis needs.

Non-Culturable: Spore Trap; Tape Swab Bulk — Culturable: BioCassette™ Andersen, Water, Bulk, Dust, ...

Sample ID	Description	Sample Type (Below)	TAT (Above)	Total Volume/Area (if 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, 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	Drywall & Joint Compound	B	STD																		X	
2	Drywall & Joint Compound	↓	↓																		X	
3	Drywall & Joint Compound																				X	
4	Drywall & Joint Compound																				X	
5	Drywall & Joint Compound																				X	
6	Yellow Mastic																				X	
7	Yellow Mastic																				X	
8	Yellow Mastic																				X	
9	2x4 Ceiling tile																				X	
10	2x4 Ceiling tile																				X	
11	Gray 12x12 VFT & white mastic																				X	
12	Gray 12x12 VFT & white mastic	↓	↓																		✓	

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	RECEIVED BY	DATE & TIME
[signature]	11/15/11	[signature]	11/15/11 10:30

EMLab P&K

Report for:

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

Regarding: Project: 100260003; 14624 Nelson
EML ID: 859093

Approved by:

Technical Manager
Miguel Ines

Dates of Analysis:
Asbestos-EPA Method 600/R-93/116: 11-29-2011

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

EMLab P&K
3585 Cadillac Ave, Suite A, Costa Mesa, CA 92626
(866) 465-6653 Fax (858) 569-5806 www.emlab.com

Client: Ardent Environmental Group, Inc.
C/O: Mr. Craig Metheny
Re: 100260003; 14624 Nelson

Date of Sampling: 11-21-2011
Date of Receipt: 11-22-2011
Date of Report: 11-29-2011

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

Total Samples Submitted:	7
Total Samples Analysed:	7
Total Samples with Layer Asbestos Content > 1%:	1

Location: 23, Layered Roof Core — Lab ID-Version‡: 3811546-1

Sample Layers	Asbestos Content
Black Roofing Material With Gravels	ND
Composite Non-Asbestos Fibrous Content:	40% Glass Fibers 25% Cellulose
Sample Composite Homogeneity:	Good

Location: 24, Layered Roof Core — Lab ID-Version‡: 3811547-1

Sample Layers	Asbestos Content
Black Roofing Material With Gravels	ND
Composite Non-Asbestos Fibrous Content:	30% Glass Fibers 25% Cellulose
Sample Composite Homogeneity:	Good

Location: 25, Gray Roof Mastic — Lab ID-Version‡: 3811548-1

Sample Layers	Asbestos Content
Gray Roofing Mastic	5% Chrysotile
Sample Composite Homogeneity:	Good

Location: 26, Layered Roof Core — Lab ID-Version‡: 3811549-1

Sample Layers	Asbestos Content
Black Roofing Material With Gravels	ND
Composite Non-Asbestos Fibrous Content:	45% Cellulose 10% Synthetic Fibers
Sample Composite Homogeneity:	Good

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".

EMLab P&K
3585 Cadillac Ave, Suite A, Costa Mesa, CA 92626
(866) 465-6653 Fax (858) 569-5806 www.emlab.com

Client: Ardent Environmental Group, Inc.
C/O: Mr. Craig Metheny
Re: 100260003; 14624 Nelson

Date of Sampling: 11-21-2011
Date of Receipt: 11-22-2011
Date of Report: 11-29-2011

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

Location: 27, Layered Roof Core Lab ID-Version‡: 3811550-1

Sample Layers	Asbestos Content
Black Roofing Material With Gravels	ND
Composite Non-Asbestos Fibrous Content:	40% Glass Fibers 25% Cellulose
Sample Composite Homogeneity:	Good

Location: 28, Roof Shingles and Tar Paper Lab ID-Version‡: 3811551-1

Sample Layers	Asbestos Content
Black Roofing Material With Gravels	ND
Composite Non-Asbestos Fibrous Content:	35% Cellulose 20% Glass Fibers
Sample Composite Homogeneity:	Good

Location: 29, Roof Shingles and Tar Paper Lab ID-Version‡: 3811552-1

Sample Layers	Asbestos Content
Black Roofing Material With Gravels	ND
Composite Non-Asbestos Fibrous Content:	35% Cellulose 20% Glass Fibers
Sample Composite Homogeneity:	Good

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".

www.EMLab[illegible].com

Cherry Hill, NJ: [illegible] Olney Avenue, Cherry Hill, NJ 08003 * (866) 871-1984
Phoenix, AZ: 1501 West Knudsen Drive, Phoenix, AZ 85027 * (800) 651-4802
San Bruno, CA: 1150 Bayhill Drive, #100, San Bruno, CA 94066 * (866) 888-6653

WEATHER	[illegible]	Fog	Rain	Snow	Wind	Clear
None						
Light						
Moderate						
Heavy						

REQU[illegible]

000859093

CONTACT INFORMATION

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

PROJECT INFORMATION

Project ID: 100260003
Project Desc.: 14624 Nelson
Project Zip Code:
Sampling Date & Time: 11/21/11
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 3pm or on weekends will be considered received the next business day. Please alert us in advance of weekend analysis needs.

Non-Culturable: Spore Trap; Tape Swab Bulk. BioC[illegible] Wate[illegible]. Other Requests

Analyses: 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)

Sample ID	Description	Sample Type (Below)	TAT (Above)	Total Volume/Area (as applicable)	NOTES (Time of day, Temp, RH, etc.)	Asbestos Analysis - PLM (EPA method 600/R-93-116)
23	Layered Roof Core	B	STD			X
24	Layered Roof Core	↓	↓			X
25	Gray Roof Mastic	↓	↓			X
26	Layered Roof Core	↓	↓			X
27	Layered Roof Core	↓	↓			X
28	Roof Shingles & Tar Paper	↓	↓			X
29	Roof Shingles & Tar Paper	↓	↓			X

SAMPLE TYPE CODES

BC - BioCassette™	ST - Spore Trap: Zefon, Allergenco, Burkard...	T - Tape	D - Dust
AS - 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	RECEIVED BY	DATE & TIME
[signature]	11/21/11 3:30	[signature]	11/22/11 1100

By submitting this Chain of Custody, you agree to be bound by the terms and conditions set forth at www.emlabpk.com/terms.html

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 **09/18/12**

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

State of California

California Environmental Protection Agency

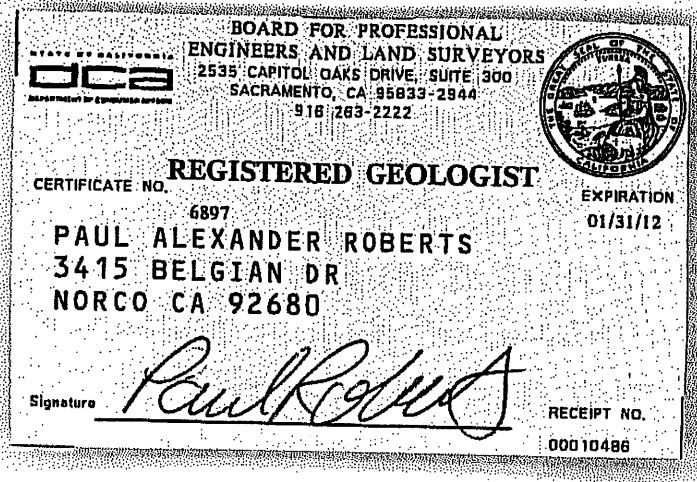
Department of Toxic Substances Control

REGISTERED ENVIRONMENTAL ASSESSOR II

Issued to: Paul Roberts, REA II - 20167

Annual Expires on: 02/28/2012

Signature:



BOARD FOR PROFESSIONAL
ENGINEERS AND LAND SURVEYORS
2535 CAPITOL OAKS DRIVE, SUITE 300
SACRAMENTO, CA 95833-2944
916 263-2222

REGISTERED GEOLOGIST

CERTIFICATE NO.
6897

EXPIRATION
01/31/12

PAUL ALEXANDER ROBERTS
3415 BELGIAN DR
NORCO CA 92680

Signature Paul Roberts

RECEIPT NO.
00010486

ARDENT
ENVIRONMENTAL
GROUP, INC.

December 9, 2011
Project No. 100260003

Mr. Kevin Radecki
City of Industry
15625 East Stafford Street, Suite 100
City of Industry, California 91744

Subject: Miscellaneous Hazardous Building Materials Survey
Building Demolition at
14624 Nelson 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 14624 Nelson Avenue, City of Industry, California (site). Suspect miscellaneous hazardous building materials include polychlorinated biphenyl (PCB)-containing light fixture ballasts, fluorescent light tubes, mercury-containing thermostat switches, and Halogen or Freon-containing equipment (e.g. air conditioning units and water coolers). This report has been prepared for the City of Industry (City) in general accordance with contract number 1-ARDENT 11-01 MP 10-07.

BUILDING LOCATION AND DESCRIPTION

The site is located at 14624 Nelson Avenue in the City of Industry, Los Angeles County, California. The site is located on the southern side of Nelson Avenue, approximately 200 feet southeast of the intersection of Sunset Avenue and Nelson Avenue. The site has been assigned the Tax Assessor's Parcel Number (APN) 8208-006-902 and contains seven commercial buildings.

The site consists of a flag-shaped property comprising approximately 4.13 acres. The site is currently vacant and contains one approximately 2,400 square foot office building and six lumber storage canopy structures. The buildings were constructed in 1982.

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

1141 Pomona Road, Suite E
Corona, California 92882

SURVEY RESULTS

Ardent performed a visual survey of the building on November 15, 2011. Based on the results of the survey, the following hazardous or universal waste materials were identified in the building.

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

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

Ardent recommends that all light fixture ballasts 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 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 PCBs, universal wastes, or other miscellaneous wastes 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 contractor prior to work.

The findings and conclusions as presented in this letter are based on the services provided, and should not be interpreted as a warranty that hazardous waste does not exist elsewhere in the subject structure. All hazardous wastes in the site building may not have been identified by this survey due to inaccessible or hidden building features.

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
(1) Mr. Dale Masl, CNC Engineering, Inc.

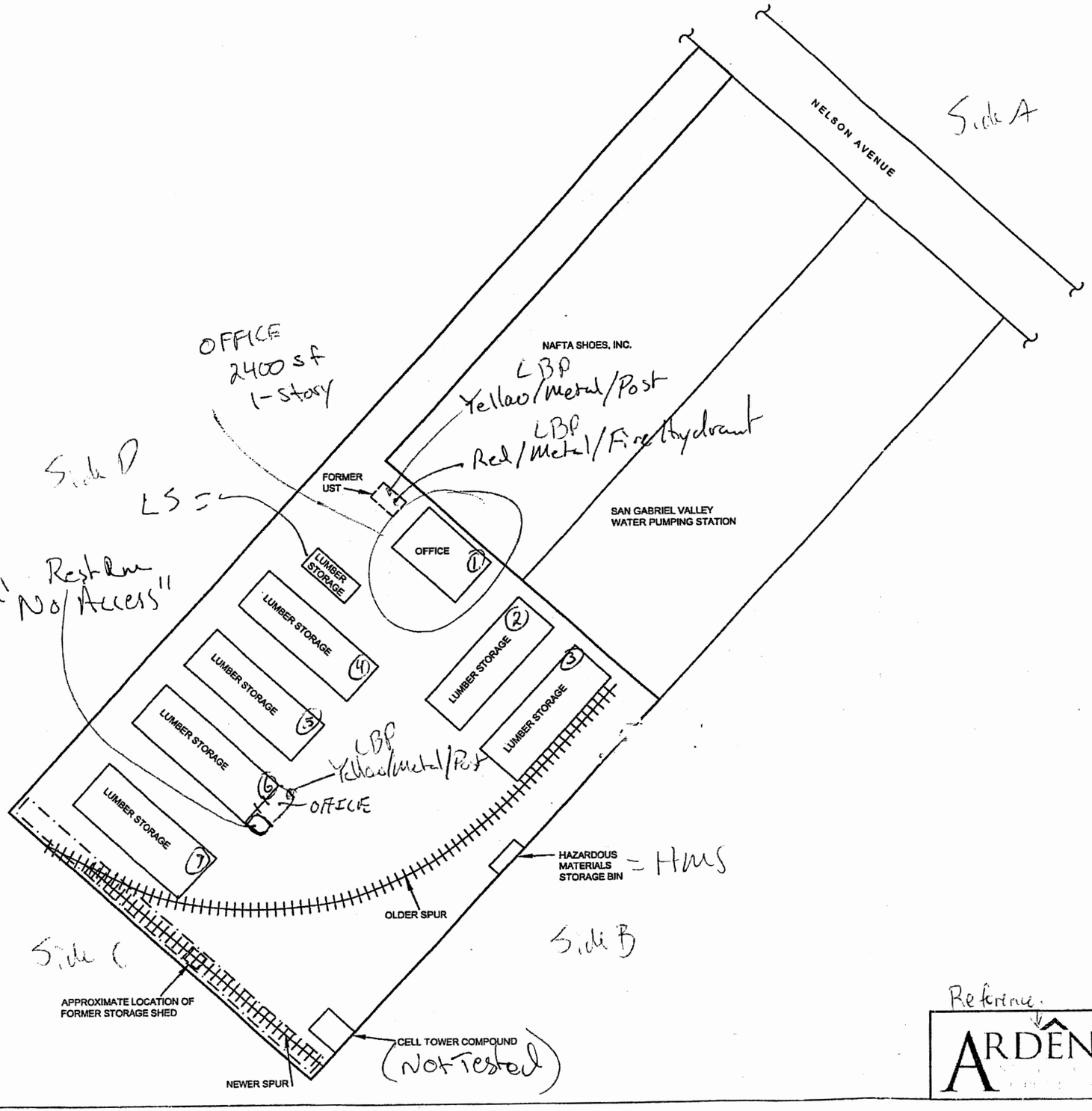
Table 1 – Universal Wastes/Miscellaneous Materials

Feature	Possible Hazardous Component	Location	Total Estimated Quantity
Fluorescent Light Tubes	Mercury	Bldg. A – Office	136 – 4 ft long
Air Conditioning Units	Freon or CFC gases	Bldg. A – Roof	2
Thermostat Switches	Mercury	Bldg. A - Office	2
Exit Signs and Thermostats	Batteries	Bldg. A - Office	2

PCB – polychlorinated biphenyls
CFC – Chlorofluorocarbons

Winzler and Kelly

LEAD TESTING MAP



LEGEND

———	APPROXIMATE SITE BOUNDARY
+++++	RAILROAD SPUR
- - - - - -	HISTORICAL FEATURES
—·—	APPROXIMATE AREA OF SEWER PIPELINE AND EXCAVATED SOIL
UST	UNDERGROUND STORAGE TANK

LBP Lead-based Paint, positive XRF reading

Side A-D Lead Testing Orientation

N

APPROXIMATE SCALE IN FEET

0 50 100

NOTE: ALL DIMENSIONS, DIRECTIONS AND LOCATIONS ARE APPROXIMATE.

Reference

ARDENT

PROJECT NO. 1156011008	**SITE PLAN**
DATE Nov. 2011	14624 NELSON AVENUE CITY OF INDUSTRY, CALIFORNIA

FIGURE 1 of 2

WIN(AND KELLY

XRF LEA(ATA TABLE

14624 EAST NELSON AVENUE, CITY OF INDUSTRY, CA												
READING NO.	TESTING DATE	COLOR	SUBSTRATE	COMPONENT	CONDITION	SIDE	BUILDING	ROOM	FLOOR	MISC	RESULTS	LEAD (mg/cm^2)
1	10/27/2011				CALIBRATE						Positive	1.1
2	10/27/2011				CALIBRATE						Positive	1.1
3	10/27/2011				CALIBRATE						Positive	1.1
4	10/27/2011	WHITE	WOOD	WALL	INTACT	D	1			EXTERIOR	Negative	0
5	10/27/2011	WHITE	WOOD	WALL	INTACT	D	1			EXTERIOR	Negative	0.02
6	10/27/2011	GREEN	METAL	RAIN GUTTER	INTACT	D	1			EXTERIOR	Negative	0.03
7	10/27/2011	GREEN	METAL	RAIN GUTTER	INTACT	D	1			EXTERIOR	Negative	0
8	10/27/2011	WHITE	METAL	RAIN GUTTER	INTACT	D	1			EXTERIOR	Negative	0
9	10/27/2011	WHITE	METAL	RAIN GUTTER	INTACT	D	1			EXTERIOR	Negative	-0.22
10	10/27/2011	GREEN	WOOD	TRIM	INTACT	D	1			EXTERIOR	Negative	0
11	10/27/2011	GREEN	WOOD	TRIM	INTACT	D	1			EXTERIOR	Negative	0
12	10/27/2011	GREEN	WOOD	DOOR	INTACT	D	1			EXTERIOR	Negative	0
13	10/27/2011	GREEN	WOOD	DOOR	INTACT	D	1			EXTERIOR	Negative	0
14	10/27/2011	WHITE	METAL	DOOR FRAME	INTACT	C	1			EXTERIOR	Negative	0
15	10/27/2011	WHITE	METAL	DOOR FRAME	INTACT	C	1			EXTERIOR	Negative	0
16	10/27/2011	WHITE	METAL	DOOR FRAME	INTACT	C	1			EXTERIOR	Negative	0
17	10/27/2011	WHITE	WOOD	CEILING	INTACT	D	1			EXTERIOR	Negative	0
18	10/27/2011	WHITE	WOOD	CEILING	INTACT	D	1			EXTERIOR	Negative	0
19	10/27/2011	BLACK	METAL	WINDOW SECURITY	INTACT	D	1			EXTERIOR	Negative	0
20	10/27/2011	BLACK	METAL	WINDOW SECURITY	INTACT	D	1			EXTERIOR	Negative	0
21	10/27/2011	BLACK	METAL	DOOR SECURITY	INTACT	D	1			EXTERIOR	Negative	0
22	10/27/2011	BLACK	METAL	DOOR SECURITY	INTACT	D	1			EXTERIOR	Negative	0
23	10/27/2011	WHITE	METAL	PIPE	INTACT	D	1			EXTERIOR	Negative	0.01
24	10/27/2011	WHITE	METAL	PIPE	INTACT	D	1			EXTERIOR	Negative	0
25	10/27/2011	WHITE	DRYWALL	WALL	INTACT	B	1	1	1	INTERIOR	Negative	0
26	10/27/2011	WHITE	DRYWALL	WALL	INTACT	C	1	1	1	INTERIOR	Negative	0
27	10/27/2011	WHITE	WOOD	DOOR	INTACT	A	1	1	1	INTERIOR	Negative	0
28	10/27/2011	WHITE	WOOD	DOOR	INTACT	A	1	1	1	INTERIOR	Negative	0
29	10/27/2011	BLACK	METAL	DOOR FRAME	INTACT	D	1	1	1	INTERIOR	Negative	0
30	10/27/2011	BLACK	METAL	DOOR FRAME	INTACT	B	1	1	1	INTERIOR	Negative	0
31	10/27/2011	WHITE	DRYWALL	WALL	INTACT	B	1	9	1	INTERIOR	Negative	0
32	10/27/2011	WHITE	DRYWALL	WALL	INTACT	D	1	9	1	INTERIOR	Negative	0
33	10/27/2011	WHITE	DRYWALL	CEILING	INTACT	0	1	9	1	INTERIOR	Negative	0
34	10/27/2011	WHITE	DRYWALL	CEILING	INTACT	0	1	9	1	INTERIOR	Negative	0
35	10/27/2011	BROWN	WOOD	TRIM	INTACT	C	1	9	1	INTERIOR	Negative	0
36	10/27/2011	BROWN	WOOD	TRIM	INTACT	C	1	9	1	INTERIOR	Negative	0
37	10/27/2011	CLEAR	WOOD	FLOOR	INTACT	0	1	9	1	INTERIOR	Negative	0
38	10/27/2011	CLEAR	WOOD	FLOOR	INTACT	0	1	9	1	INTERIOR	Negative	0
39	10/27/2011	CLEAR	WOOD	FLOOR	INTACT	0	1	12	1	INTERIOR	Negative	0
40	10/27/2011	CLEAR	WOOD	FLOOR	INTACT	0	1	12	1	INTERIOR	Negative	0
41	10/27/2011	WHITE	METAL	CEILING TGRID	INTACT	0	1	12	1	INTERIOR	Negative	0
42	10/27/2011	WHITE	METAL	CEILING TGRID	INTACT	0	1	12	1	INTERIOR	Negative	0

14624 EAST NELSON AVENUE, CITY OF INDUSTRY, CA												
READING NO.	TESTING DATE	COLOR	SUBSTRATE	COMPONENT	CONDITION	SIDE	BUILDING	ROOM	FLOOR	MISC	RESULTS	LEAD (mg/cm²)
43	10/27/2011	WHITE	PORCELAIN	TOILET	INTACT	C	1	5	1	INTERIOR	Negative	0.03
44	10/27/2011	WHITE	PORCELAIN	URINAL	INTACT	C	1	5	1	INTERIOR	Negative	0.01
45	10/27/2011	GRAY	WOOD	WALL PANEL	INTACT	A	1	5	1	INTERIOR	Negative	0.01
46	10/27/2011	GRAY	WOOD	WALL PANEL	INTACT	A	1	5	1	INTERIOR	Null	0.01
47	10/27/2011	GRAY	WOOD	WALL PANEL	INTACT	A	1	5	1	INTERIOR	Null	0
48	10/27/2011	GRAY	WOOD	WALL PANEL	INTACT	A	1	5	1	INTERIOR	Negative	0.01
49	10/27/2011	WHITE	DRYWALL	WALL	INTACT	A	1	5	1	INTERIOR	Negative	0.02
50	10/27/2011	WHITE	DRYWALL	CEILING	INTACT	0	1	5	1	INTERIOR	Null	0
51	10/27/2011	WHITE	DRYWALL	CEILING	INTACT	0	1	5	1	INTERIOR	Negative	0
52	10/27/2011	WHITE	PLASTIC	CABINET	INTACT	C	1	5	1	INTERIOR	Negative	0
53	10/27/2011	GRAY	PLASTIC	COUNTER	INTACT	C	1	5	1	INTERIOR	Negative	0
54	*10/27/2011*	*YELLOW*	*METAL*	*POST*	*INTACT*	*C*	*UST*		*1*	*EXTERIOR*	*LBP*	*1.2*
55	*10/27/2011*	*RED*	*METAL*	*FIRE HYDRANT*	*INTACT*	*C*	*UST*		*1*	*EXTERIOR*	*LBP*	*1.5*
56	10/27/2011	YELLOW	ASPHALT	FLOOR STRIPE	INTACT	0	UST		1	EXTERIOR	Null	0.04
57	10/27/2011	YELLOW	ASPHALT	FLOOR STRIPE	INTACT	0	UST		1	EXTERIOR	Negative	0.02
58	10/27/2011	YELLOW	ASPHALT	FLOOR STRIPE	INTACT	0	UST		1	EXTERIOR	Negative	0.01
59	10/27/2011	GREEN	METAL	POST	INTACT	A	LS		1	EXTERIOR	Negative	0
60	10/27/2011	GREEN	METAL	POST	INTACT	A	LS		1	EXTERIOR	Negative	0
61	10/27/2011	WHITE	METAL	WALL	INTACT	D	LS		1	EXTERIOR	Negative	0
62	10/27/2011	WHITE	METAL	WALL	INTACT	B	LS		1	EXTERIOR	Negative	0
63	10/27/2011	BROWN	METAL	TRIM	INTACT	A	LS		1	EXTERIOR	Negative	0
64	10/27/2011	BROWN	METAL	TRIM	INTACT	A	LS		1	EXTERIOR	Negative	0
65	10/27/2011	WHITE	WOOD	WALL	FAIR	C	2		1	EXTERIOR	Negative	0
66	10/27/2011	TAN	WOOD	WALL	FAIR	A	2		1	EXTERIOR	Negative	0
67	10/27/2011	BROWN	WOOD	TRIM	INTACT	A	2		1	EXTERIOR	Negative	0
68	10/27/2011	GREEN	WOOD	TRIM	INTACT	B	2		1	EXTERIOR	Negative	0
69	10/27/2011	WHITE	METAL	RAIN GUTTER	INTACT	C	2		1	EXTERIOR	Negative	0
70	10/27/2011	CLEAR	WOOD	POLE	INTACT	C	2		1	EXTERIOR	Negative	0
71	10/27/2011	WHITE	WOOD	WALL	FAIR	C	3		1	EXTERIOR	Negative	0
72	10/27/2011	TAN	WOOD	WALL	FAIR	A	3		1	EXTERIOR	Negative	0.04
73	10/27/2011	BROWN	WOOD	TRIM	FAIR	A	3		1	EXTERIOR	Negative	0
74	10/27/2011	GREEN	WOOD	TRIM	INTACT	B	3		1	EXTERIOR	Negative	0.01
75	10/27/2011	WHITE	METAL	RAIN GUTTER	INTACT	C	3		1	EXTERIOR	Negative	0
76	10/27/2011	CLEAR	WOOD	POLE	INTACT	C	3		1	EXTERIOR	Negative	0
77	10/27/2011	WHITE	WOOD	WALL	INTACT	C	HMS		1	EXTERIOR	Negative	0
78	10/27/2011	GREEN	WOOD	TRIM	FAIR	C	HMS		1	EXTERIOR	Negative	0
79	10/27/2011	WHITE	WOOD	CEILING	POOR	0	HMS		1	EXTERIOR	Negative	0
80	10/27/2011	WHITE	WOOD	WALL	FAIR	B	4		1	EXTERIOR	Negative	0
81	10/27/2011	GREEN	WOOD	TRIM	FAIR	A	4		1	EXTERIOR	Negative	0
82	10/27/2011	WHITE	METAL	RAIN GUTTER	INTACT	B	4		1	EXTERIOR	Negative	0
83	10/27/2011	CLEAR	WOOD	POLE	INTACT	B	4		1	EXTERIOR	Negative	0
84	10/27/2011	YELLOW	METAL	POST LARGE	INTACT	A	4		1	EXTERIOR	LCSC	0.2

14624 EAST NELSON AVENUE, CITY OF INDUSTRY, CA												
READING NO.	TESTING DATE	COLOR	SUBSTRATE	COMPONENT	CONDITION	SIDE	BUILDING	ROOM	FLOOR	MISC	RESULTS	LEAD (mg/cm^2)
85	10/27/2011	WHITE	WOOD	WALL	FAIR	B	5		1	EXTERIOR	Negative	0
86	10/27/2011	GREEN	WOOD	TRIM	FAIR	B	5		1	EXTERIOR	Negative	0
87	10/27/2011	WHITE	METAL	RAIN GUTTER	INTACT	B	5		1	EXTERIOR	Negative	0
88	10/27/2011	CLEAR	WOOD	POLE	INTACT	D	5		1	EXTERIOR	Negative	0
89	10/27/2011	WHITE	WOOD	WALL	FAIR	A	6		1	EXTERIOR	Negative	0
90	10/27/2011	GREEN	WOOD	TRIM	FAIR	A	6		1	EXTERIOR	Negative	0
91	10/27/2011	CLEAR	WOOD	POLE	INTACT	A	6		1	EXTERIOR	Negative	0
92	10/27/2011	GREEN	METAL	POST	POOR	C	6		1	EXTERIOR	Negative	0
93	10/27/2011	WHITE	DRYWALL	WALL	INTACT	C	6 OFFICE		1	INTERIOR	Negative	0.01
94	10/27/2011	WHITE	DRYWALL	CEILING	INTACT	0	6 OFFICE		1	INTERIOR	Negative	0
95	10/27/2011	WHITE	WOOD	DOOR	INTACT	C	6 OFFICE		1	INTERIOR	Negative	0
96	10/27/2011	BROWN	METAL	DOOR FRAME	INTACT	B	6 OFFICE		1	INTERIOR	Negative	0.03
97	10/27/2011	WHITE	WOOD	WALL	FAIR	B	7		1	EXTERIOR	Negative	0
98	10/27/2011	GREEN	WOOD	TRIM	POOR	A	7		1	EXTERIOR	Null	0
99	10/27/2011	GREEN	WOOD	TRIM	POOR	A	7		1	EXTERIOR	Negative	0
100	10/27/2011	WHITE	METAL	RAIN GUTTER	INTACT	B	7		1	EXTERIOR	Negative	0
101	10/27/2011	CLEAR	WOOD	POLE	INTACT	B	7		1	EXTERIOR	Negative	0
102	10/27/2011	YELLOW	METAL	POST	INTACT	B	7		1	EXTERIOR	LCSC	0.4
103	10/27/2011	YELLOW	METAL	POST	INTACT	B	7		1	EXTERIOR	LCSC	0.6
104	*10/27/2011*	*YELLOW*	*METAL*	*POST*	*FAIR*	*B*	*6*		*1*	*EXTERIOR*	*LBP*	*0.7*
105	10/27/2011	RED	METAL	FIRE HYDRANT	INTACT	B	6		1	EXTERIOR	LCSC	0.6
106	10/27/2011				CALIBRATE						Positive	1.2
107	10/27/2011				CALIBRATE						Negative	0.9
108	10/27/2011				CALIBRATE						Positive	1.1

Notes:

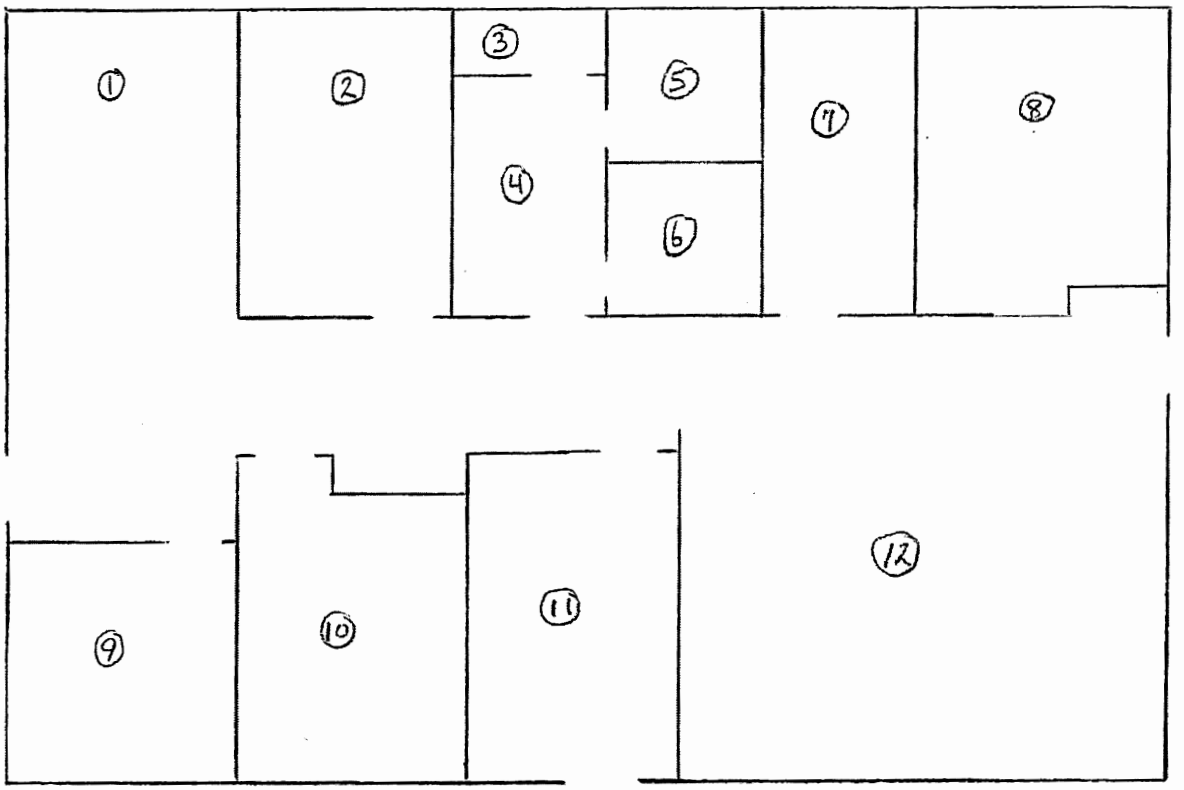
XRF - X-ray fluorescence spectrum analyzer | INT - Interior | Null - Incomplete reading

mg/cm^2 - milligrams per square centimeter | EXT - Exterior | < 0.01 = 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



LEGEND

(1) Room Number

NORTH

1" = 10'

Project No 1156011008	BUILDING 1	Figure 2 of 2
Date 11/11	14624 Nelson Avenue City of Industry, California	

State of California—Health and Human Services Agency | California Department of Public Health

LEAD HAZARD EVALUATION REPORT

Section 1 — Date of Lead Hazard Evaluation 10/27/2011

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
14624 Nelson Ave.	City of Industry	CA	

Construction date (year) of structure	Type of structure		Children living in structure?	
Unknown @ This Time	☒ Multi-unit building	☐ School or daycare	☐ Yes	☒ No
	☐ Single family dwelling	☐ Other_____	☐ Don't Know	

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

Name	Telephone number
City of Industry C/O Craig Wetherly	961-736-5334

Address [number, street, apartment (if applicable)]	City	State	Zip Code
1141 Pomona rd. Ste "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 Lead Bearing Substrate

Section 6 — Individual Conducting Lead Hazard Evaluation

Name	Telephone number
Steve Pitts/ Winzler + Kelly	858 2440440

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

CDPH certification number	Signature	Date
#15644		10/27/11

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

Mike Toomey #21344

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

CDPH 8552 (6/07)