



**HAZARDOUS MATERIALS REMOVAL WORK PLAN
BUILDING DEMOLITION
14700 NELSON AVENUE (FRONT)
CITY OF INDUSTRY, CALIFORNIA**

PREPARED FOR:

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

PREPARED BY:

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1141 Pomona Road, Suite E
Corona, California 92882

December 9, 2011
Project No. 100213003

ARDENT

ENVIRONMENTAL
GROUP, INC.

December 9, 2011
Project No. 100213003

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
14700 Nelson Avenue (Front)
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 14700 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 14700 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, 14700 Nelson Avenue (Front), City of Industry, California: unpublished report dated December 9.

Ardent Environmental Group, Inc. 2011b, Miscellaneous Hazardous Building Material Survey, 14700 Nelson Avenue (Front), City of Industry, California: unpublished report dated December 9.

Winzler & Kelly, 2011, Pre-Demolition Lead Testing Services Report, Former Lumber Yard, 14700 Nelson Avenue (Front), City of Industry, California: unpublished report dated November 10.

1.1. Project Location and Description

The site is located at 14700 Nelson Avenue in the City of Industry, Los Angeles County, California. The site is located on the southern side of Nelson Avenue, approximately 540 feet southeast of the intersection of Sunset Avenue and Nelson Avenue. The site has been assigned the Tax Assessor’s Parcel Number (APN) 8208-006-900 and contains eight commercial buildings.

The site consists of a rectangular shaped property comprising approximately 3.8 acres. The site is currently vacant and contains one approximately 6,000 square foot office building with a warehouse structure attached, six lumber storage canopy structures, and one shed. The buildings were constructed in 1970. The site buildings are of wood frame construction. Floors are generally unfinished concrete except in the office which has floors finished with carpet, sheet linoleum, vinyl floor tiles, and ceramic 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 sub-contractors).
- 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. 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, hand 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 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 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 conducted 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 following 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 or 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 an 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:
 - o Interior Floors – 40 micrograms per square foot (ug/ft^2)
 - o Interior Window Surfaces/Sills – 250 ug/ft^2
 - o 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 (TTLIC), 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 may, 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 be 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. MISCELLANEOUS 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		
Beige Linoleum and Backing	A	11 & 27	230 SF	Good/Non-Friable
Dark Brown Mastic Behind Wall Panels	A	2 & 20	840 SF	Good/Non-Friable
Mottled Gray Linoleum and Backing (under dark gray linoleum)	A	15	235 SF	Good/Non-Friable
Asbestos Cement Roof Shingles	A	Roof – North Section	2,250 SF	Good/Non-Friable
Layered Roof Core	A	Roof – Central Flat Section	1,800 SF	Good/Non-Friable
Gray Roof Mastic	A	Roof – AC Platforms	50 SF	Good/Non-Friable
Dark Gray Roof Mastic	A	Roof – Penetrations, Patches & Flashing	50 SF	Good/Non-Friable
Black Mastic with Silver Paint	A	Roof Vents - Warehouse	30 SF	Good/Non-Friable
Drywall & Joint Compound	A	Room 6	190 SF	Good/Friable
Gray Roof Mastic	F	Roof – Skylights & Patches	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
Tan Mastic Behind Wall Panels	Bldg. A, Rooms 3 & 4	400 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 3 – Lead-Based Paint and Lead-Bearing Substances

Feature (color/substrate/component)	Location	Quantity	Condition
White/Ceramic/Floor Tile	Building 1 (A) - Room 1	12 SF	Intact
Brown/Metal/Floor Drain	Building 1 (A) - Rooms 6 & 7	2 Each	Intact
Red/Metal/Pipe	Building 3 (C) - Exterior	15 LF	Intact
Gray/Metal/Wall	Building 4 (D) - Exterior	1,000 SF	Intact
Red/Metal/Ceiling & Walls	Building 4 (D) - Interior	1,320 SF	Intact
Yellow/Asphalt/Floor Stripe	Building 1 (A) - Exterior	60 LF	Fair
Red/Metal/Cabinet	Building 5 (E) - Exterior	10 SF	Intact
Yellow/Metal Fire Hydrant	Building 6 (F) – Exterior	1 Each	Intact
Red/Metal/ Cabinet	Building 3 (C) - Exterior	1 Each	Intact
Red/Metal/Cabinet	Building 8 (H) - Exterior	1 Each	Intact
Locations are shown in Figures 1 & 2 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 Ballasts	PCBs	Bldg. A – Office and Warehouse	230
Fluorescent Light Tubes	Mercury	Bldg. A – Office and Warehouse	550 – 4 ft long 2 – U-Shape 6 – 3 ft long
Air Conditioning Units	Freon or CFC gases	Roof	5
Mercury Vapor Lamps	Mercury	Bldg. A - Warehouse	21
Thermostat Switches	Mercury	Bldg. A - Office	3
Exit Signs and Thermostats	Batteries	Bldg. A - Office	3
PCB – polychlorinated biphenyls CFC – Chlorofluorocarbons			

APPENDIX A

HAZARDOUS BUILDING MATERIAL SURVEY REPORTS



**ASBESTOS SURVEY
14700 NELSON AVENUE (FRONT)
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. 100213003

ARDENT
ENVIRONMENTAL
GROUP, INC.

December 9, 2011
Project No. 100213003

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

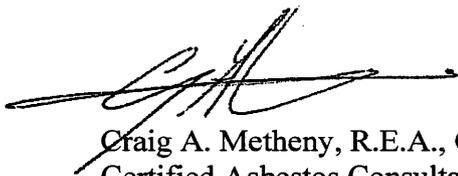
Subject: Asbestos Survey
14700 Nelson Avenue (Front)
City of Industry, California

Dear Mr. Radecki:

In accordance with your authorization, Ardent Environmental Group, Inc. has completed a pre-demolition asbestos survey of the buildings located at 14700 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.

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Appendices

Appendix A – Laboratory Reports

Appendix B – Certifications

1. INTRODUCTION

Ardent Environmental Group, Inc. (Ardent) performed a pre-demolition asbestos survey of the buildings located at 14700 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 10-01 #2.

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 14700 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 540 feet southeast of the intersection of Sunset Avenue and Nelson Avenue. The site has been assigned the Tax Assessor's Parcel Number (APN) 8208-006-900 and contains eight commercial buildings.

The site consists of a rectangular shaped property comprising approximately 3.8 acres. The site is currently vacant and contains one approximately 6,000 square foot office building with a warehouse structure attached, six lumber storage canopy structures, and one shed (Figure 2). The buildings were constructed in 1970. The site buildings are of wood frame construction. Floors are generally unfinished concrete except in the office which has floors finished with carpet, sheet linoleum, vinyl floor tiles, and ceramic 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 66 bulk samples for laboratory analysis. The samples were collected by a California Certified Asbestos Consultant in accordance with EPA and California Department of Health Services guidelines.
- Bulk samples were analyzed for asbestos content by polarized light microscopy (PLM) in accordance with EPA method 600/R-93/116 by an NVLAP accredited laboratory. Selected samples were further analyzed by the EPA Point Count 1000 method.
- Preparation of this report.

5. ASBESTOS SURVEY METHODS

The asbestos survey was performed between November 7, 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 from 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 66 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. Four samples which showed a trace (<1 percent) amount of asbestos by the PLM analysis were further analyzed by the EPA Point Count 1000 method.

The PLM method used has a detection limit of 1 percent. Materials reported to contain 1 percent or more are considered asbestos-containing materials (ACM). A material reported to have a trace percentage of asbestos (present at less than 1 percent) should be treated as an asbestos-containing construction material (ACCM, greater than 0.1 percent asbestos) unless analyzed by other methods, such as the Point Count method. The Point Count 1000 method has a detection limit of 0.1 percent. The laboratory reports are presented as Attachment A. The laboratory results are summarized in Table 2.

7. DISCUSSION OF RESULTS AND CONCLUSIONS

A total of 66 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		
D	Beige Linoleum and Backing	A	11 & 27	230 sf	Good/Non-Friable
H	Dark Brown Mastic Behind Wall Panels	A	2 & 20	840 sf	Good/Non-Friable
J	Mottled Gray Linoleum and Backing (under dark gray linoleum)	A	15	235 sf	Good/Non-Friable
K	Asbestos Cement Roof Shingles	A	Roof – North Section	2,250 sf	Good/Non-Friable
O	Layered Roof Core	A	Roof – Central Flat Section	1,800 sf	Good/Non-Friable
Q	Gray Roof Mastic	A	Roof – AC Platforms	50 sf	Good/Non-Friable
R	Dark Gray Roof Mastic	A	Roof – Penetrations, Patches & Flashing	50 sf	Good/Non-Friable
U	Black Mastic with Silver Paint	A	Roof Vents - Warehouse	30 sf	Good/Non-Friable
A	Drywall & Joint Compound	A	Room 6	190 sf	Good/Friable
X	Gray Roof Mastic	F	Roof – Skylights & Patches	30 sf	Good/Non-Friable

HA = Homogeneous Area (see Table 1)
 sf = square feet
 Building and room number locations are shown in Figures 2, 3, & 4

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

HA	Description	Location	Quantity	Condition
F	Tan Mastic Behind Wall Panels	Bldg. A, Room 3, 4, & 5	400 sf	Good/Non-Friable

HA = Homogeneous Area (see Table 1)
 sf = square feet
 Building and room number locations are shown in Figures 2 & 3

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 Carpet mastic	A	Throughout
C	Black & Gray 12"x12" Floor Tile with Yellow Mastic	A	Rooms 14, 17, 24, & Corridors
D	Beige Linoleum with Clear Mastic	A	Rooms 11 & 27
E	Dark Gray 12"x12" Floor Tile with Yellow Mastic	A	Rooms 8 & 10
F	Tan Mastic Behind Wall Panelling	A	Throughout
G	2'x4' Suspended Ceiling Tile	A	Throughout
H	Dark Brown Mastic Behind Wall Panelling	A	Rooms 2 & 20
I	Dark Gray Linoleum with Yellow Mastic	A	Room 15
J	Mottled Gray Linoleum with White Mastic	A	Room 15 (under I)
K	Cement Roof Shingles	A	North Side Pitched Roof
L	Roof Tar Under Cement Shingles	A	North Side Pitched Roof
M	Gray Composite Roof Shingles	A	Pitched Roof
N	Tar Paper Under Composite Shingles	A	Pitched Roof
O	Layered Roof Core	A	Flat Roof
P	Black Roof Mastic	A	Roof - AC Platforms & Penetrations
Q	Gray Roof Mastic	A	Roof - AC Platforms & Patches
R	Dark Gray Roof Mastic	A	Roof - Penetrations and Patches
S	Gray Mastic	A	AC Ducting
T	Layered Roof Core	A, B, C, & F	Warehouse portion of Bldg. A and Bldgs. B, C, & F
U	Black Mastic with Silver Paint	A	Roof Vents - Warehouse Portion
V	Layered Roof Core	D	Roof
W	Layered Roof Core	E, G, & H	Roof
X	Gray Mastic	F	Skylights and Patches

Note: Locations of buildings and room numbers are shown in Figures 2, 3, and 4.

TABLE 2 - ASBESTOS SAMPLE RESULTS

Sample Number	HA Number	Type of Material	Location		Asbestos Content
			Building	Room	
1	A	Drywall & Joint Compound with Texture	A	Room 23	Texture = 0.1% Joint Compound = ND Drywall = ND
2	A	Drywall & Joint Compound	A	Room 21	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 3	Joint Compound = ND Drywall = ND
5	A	Drywall & Joint Compound	A	Room 24	Joint Compound = ND Drywall = ND
6	A	Drywall & Joint Compound	A	Room 8	Joint Compound = ND Drywall = ND
7	A	Drywall & Joint Compound	A	Room 16	Joint Compound = ND Drywall = ND
8	B	Yellow Carpet Mastic	A	Room 17	ND
9	B	Yellow Carpet Mastic	A	Room 16	ND
10	B	Yellow Carpet Mastic	A	Room 20	ND
11	C	Gray 12"x12" Floor Tile with Yellow Mastic	A	Room 24	Floor Tile = ND Mastic = ND
12	C	Gray 12"x12" Floor Tile with Yellow Mastic	A	Room 14	Floor Tile = ND Mastic = ND
13	C	Gray 12"x12" Floor Tile with Yellow Mastic	A	Corridor	Floor Tile = ND Mastic = ND
14	D	Beige Linoleum with White Mastic	A	Room 11	Linoleum & Backing = 20% Chrysotile Mastic = ND
15	D	Beige Linoleum with White Mastic	A	Room 11	Linoleum & Backing = 20% Chrysotile Mastic = ND
16	D	Beige Linoleum with White Mastic	A	Room 27	Linoleum & Backing = 20% Chrysotile Mastic = ND
17	E	Dark Gray 12"x12" Floor Tile with Yellow Mastic	A	Room 10	Floor Tile = ND Mastic = ND

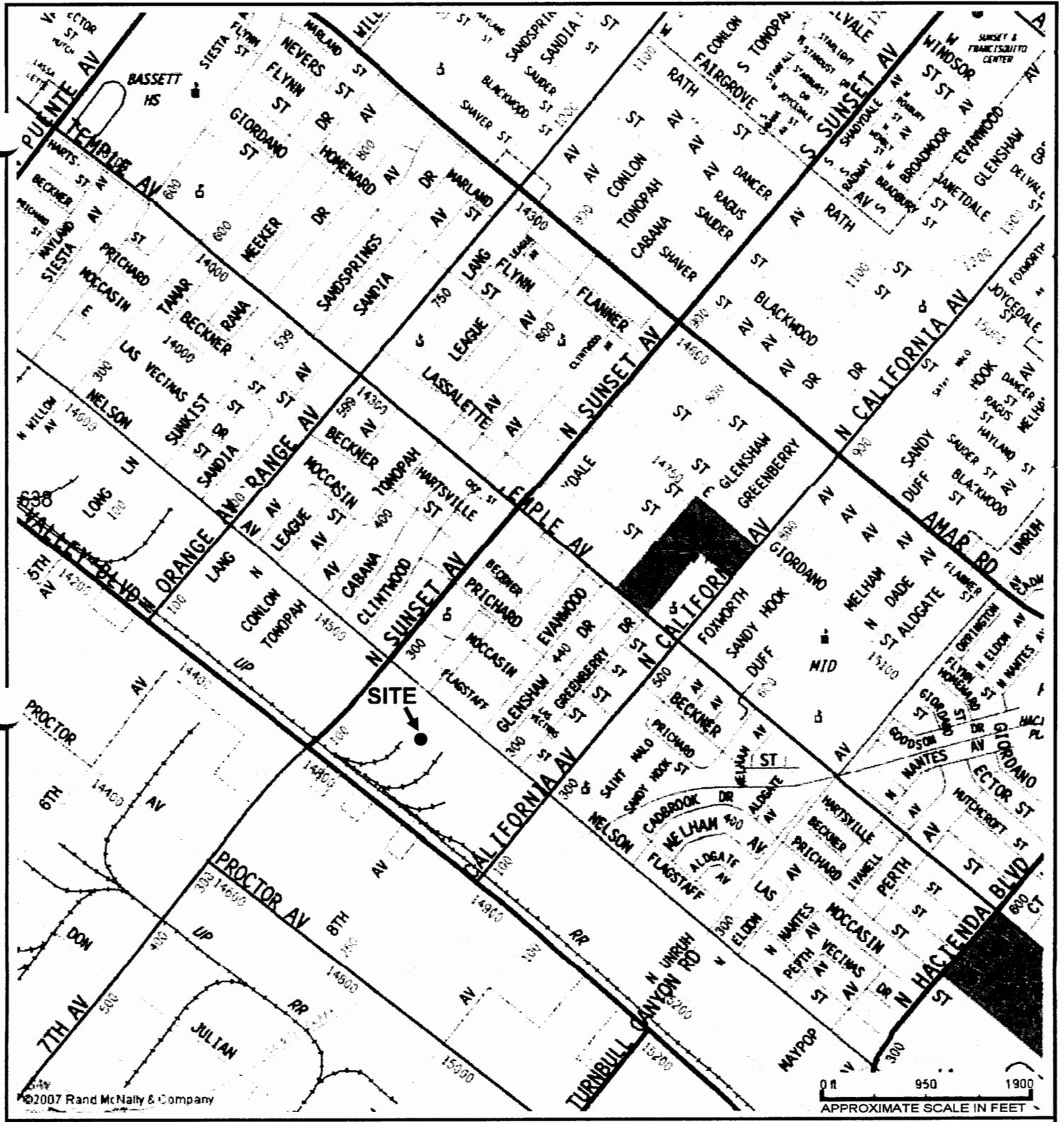
TABLE 2 - ASBESTOS SAMPLE RESULTS

Sample Number	HA Number	Type of Material	Location		Asbestos Content
			Building	Room	
18	E	Dark Gray 12"x12" Floor Tile with Yellow Mastic	A	Room 8	Floor Tile = ND Mastic = ND
19	F	Tan Mastic Behind Wall Panelling	A	Room 24	ND
20	F	Tan Mastic Behind Wall Panelling	A	Room 16	ND
21	F	Tan Mastic Behind Wall Panelling	A	Room 3	Trace <1% Chrysotile
22	G	2'x4' Suspended Ceiling Tile	A	Room 24	ND
23	G	2'x4' Suspended Ceiling Tile	A	Room 19	ND
24	G	2'x4' Suspended Ceiling Tile	A	Room 4	ND
25	H	Dark Brown Mastic Behind Wall Panelling	A	Room 20	5% Chrysotile
26	H	Dark Brown Mastic Behind Wall Panelling	A	Room 2	5% Chrysotile
27	I	Dark Gray Linoleum with Yellow Mastic	A	Room 15	Linoleum & Backing = ND Mastic = ND
28	I	Dark Gray Linoleum with Yellow Mastic	A	Room 15	Linoleum & Backing = ND Mastic = ND
29	J	Mottled Gray Linoleum with White Mastic	A	Room 15	Linoleum & Backing = 20% Chrysotile Mastic = ND
30	J	Mottled Gray Linoleum with White Mastic	A	Room 15	Linoleum & Backing = 20% Chrysotile Mastic = ND
31	F	Tan Mastic Behind Wall Panelling	A	Room 26	ND
32	A	Drywall & Joint Compound	A	Room 26	Joint Compound = ND Drywall = ND
33	K	Cement Roof Shingles	A	Roof	20% Chrysotile
34	K	Cement Roof Shingles	A	Roof	20% Chrysotile
35	L	Roof Tar	A	Roof	ND
36	L	Roof Tar	A	Roof	ND
37	M	Gray Composite Roof Shingle	A	Roof	ND
38	M	Gray Composite Roof Shingle	A	Roof	ND
39	N	Tar Paper	A	Room 8	ND
40	N	Tar Paper	A	Roof	ND
41	O	Layered Roof Core	A	Roof	Composite Roof Core = 2% Chrysotile
42	O	Layered Roof Core	A	Roof	Composite Roof Core = 2% Chrysotile
43	P	Black Roof Mastic	A	Roof - AC Platform	ND
44	P	Black Roof Mastic	A	Roof - Penetration	ND
45	Q	Gray Roof Mastic	A	Roof - AC Platform	5% Chrysotile

TABLE 2 - ASBESTOS SAMPLE RESULTS

Sample Number	HA Number	Type of Material	Location		Asbestos Content
			Building	Room	
46	Q	Gray Roof Mastic	A	Roof - AC Platform	5% Chrysotile
47	R	Dark Gray Roof Mastic	A	Roof	5% Chrysotile
48	R	Dark Gray Roof Mastic	A	Roof	5% Chrysotile
49	S	Gray Mastic	A	Roof - AC Ducting	ND
50	S	Gray Mastic	A	Roof - AC Ducting	ND
51	R	Dark Gray Roof Mastic	A	Roof	5% Chrysotile
52	Q	Gray Roof Mastic	A	Roof	ND
53	T	Layered Roof Core	A	Roof - Warehouse	Cap Sheet = ND Felt Layer 1 = ND Felt Layer 2 = ND
54	T	Layered Roof Core	A	Roof - Warehouse	Cap Sheet = ND Felt Layer 1 = ND Felt Layer 2 = ND
55	U	Black Mastic with Silver Paint	A	Roof - Warehouse Vent	5% Chrysotile
56	U	Black Mastic with Silver Paint	A	Roof - Warehouse Vent	ND
57	U	Black Mastic with Silver Paint	A	Roof - Warehouse Vent	5% Chrysotile
58	A	Drywall & Joint Compound	A	Electrical Room	Joint Compound = 2% Chrysotile Drywall = ND
59	V	Layered Roof Core	D	Roof	Cap Sheet = ND Tar Paper = ND
60	T	Layered Roof Core	B	Roof	ND
61	T	Layered Roof Core	F	Roof	ND
62	X	Gray Mastic	F	Roof - Skylight	5% Chrysotile
63	X	Gray Mastic	F	Roof - Skylight	5% Chrysotile
64	X	Gray Mastic	F	Roof - Patch	5% Chrysotile
65	W	Layered Roof Core	H	Roof	ND
66	W	Layered Roof Core	G	Roof	ND

Notes:
 HA = Homogeneous Area (see Table 1)
 ND = Not Detected
 Building, room, and sample locations are shown in Figures 2, 3, & 4.



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



NOTE: ALL DIMENSIONS, DIRECTIONS, AND LOCATIONS ARE APPROXIMATE

ARDENT
ENVIRONMENTAL
GROUP, INC.

PROJECT NO.

100213003

DATE

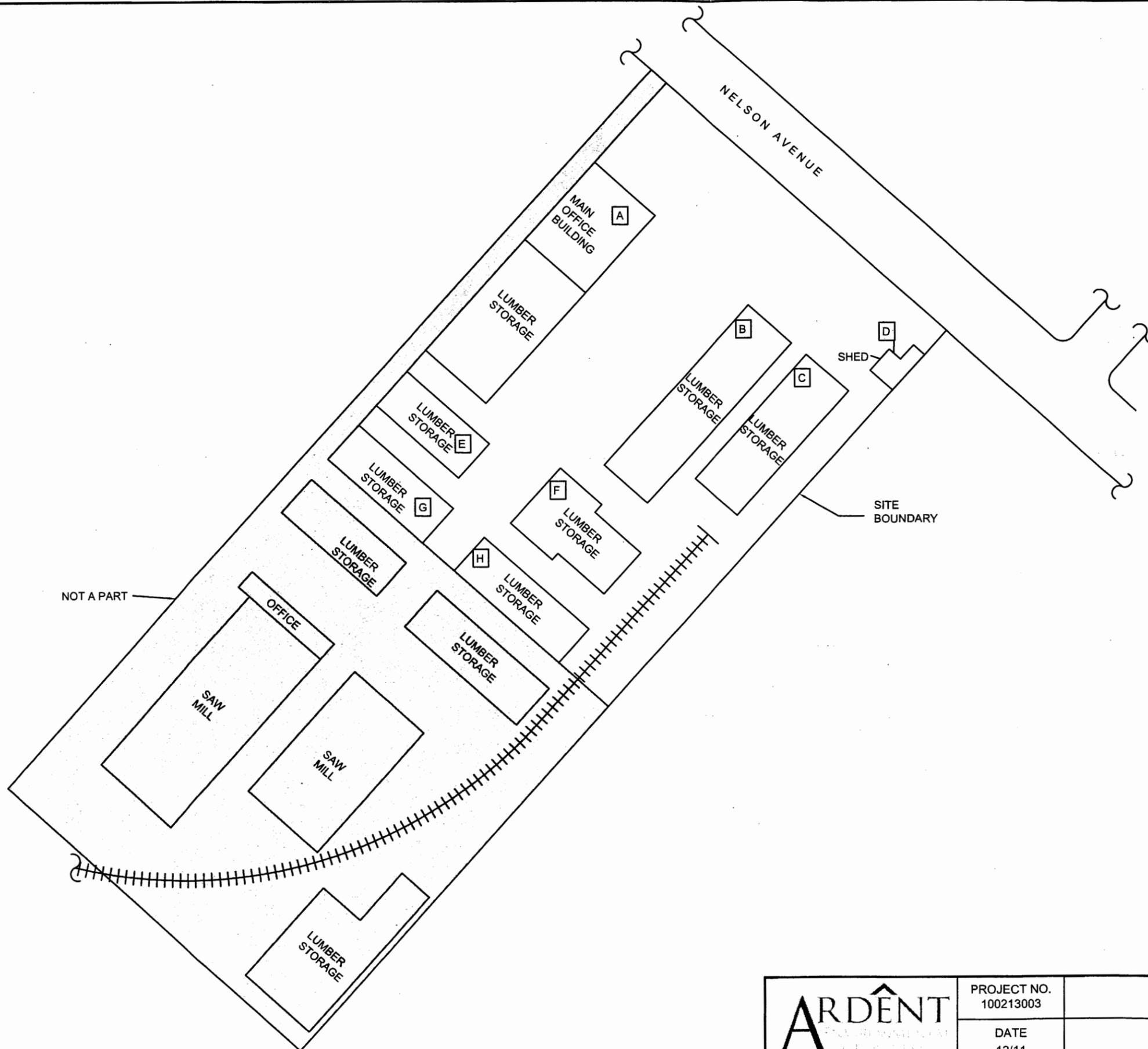
12/11

SITE LOCATION MAP

14700 NELSON AVENUE (Front)
CITY OF INDUSTRY, CALIFORNIA

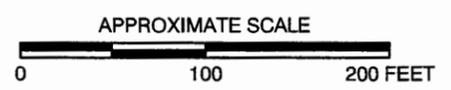
FIGURE

1



LEGEND

- ++++ ON-SITE RAILROAD SPUR
- [A] BUILDING DESIGNATION

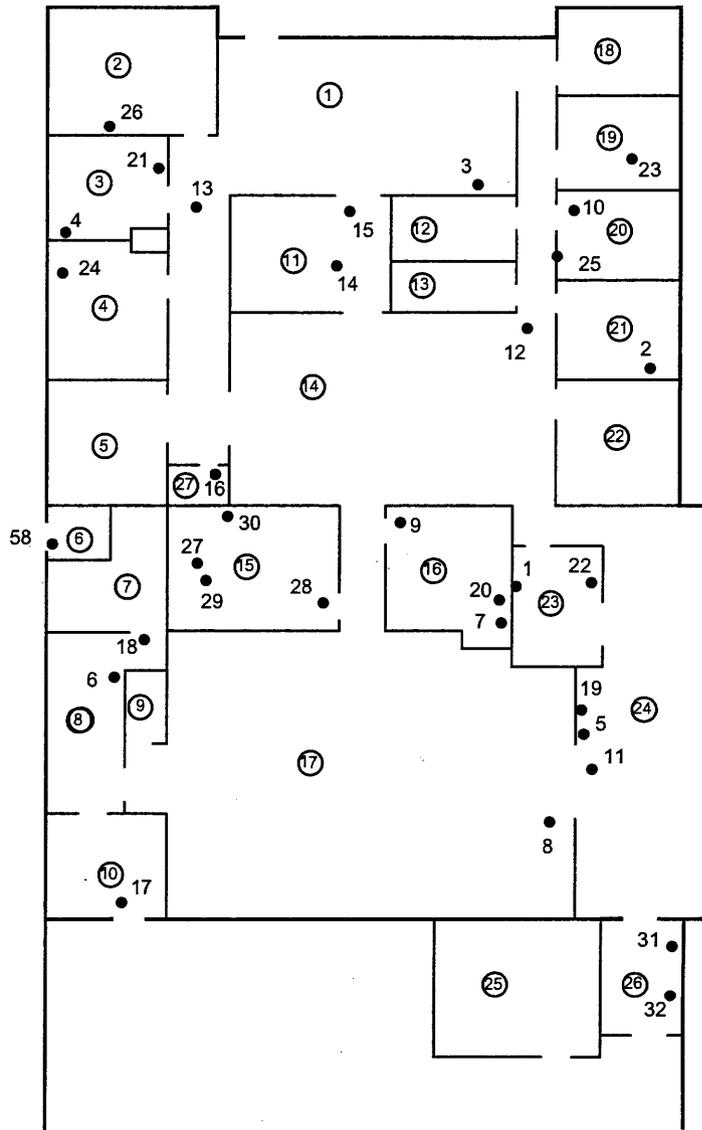


NOTE: ALL DIMENSIONS, DIRECTIONS AND LOCATIONS ARE APPROXIMATE.

	PROJECT NO. 100213003	SITE PLAN	FIGURE
	DATE 12/11	14700 NELSON AVENUE (FRONT) CITY OF INDUSTRY, CALIFORNIA	2

LEGEND

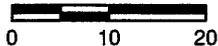
- ① ROOM NUMBER
- 2 SAMPLE LOCATION



WAREHOUSE



APPROXIMATE SCALE IN FEET



NOTE: ALL DIMENSIONS, DIRECTIONS AND LOCATIONS ARE APPROXIMATE.



PROJECT NO.
100213003

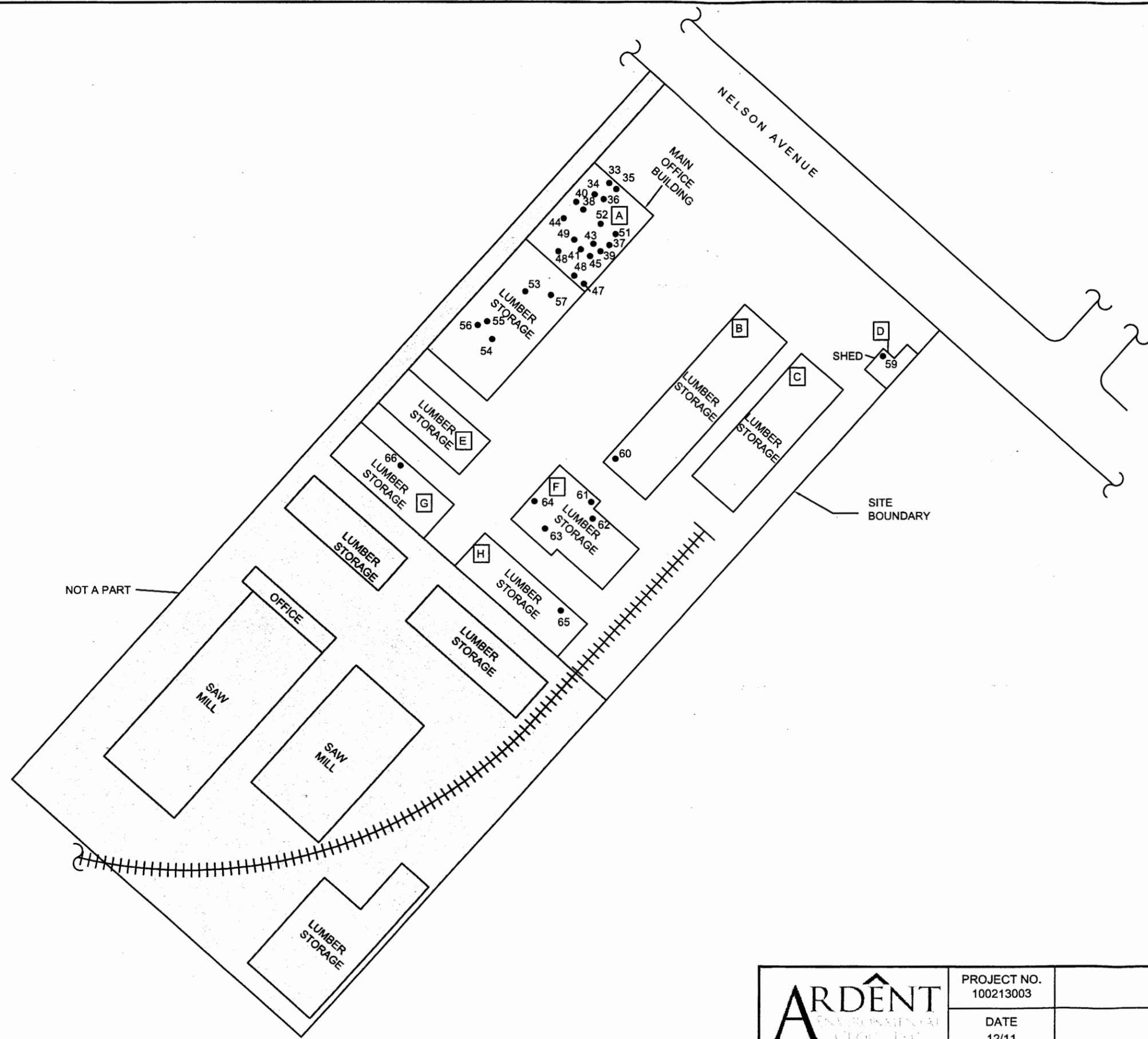
DATE
12/11

SAMPLE LOCATIONS - BUILDING A

14700 NELSON AVENUE (FRONT)
CITY OF INDUSTRY, CALIFORNIA

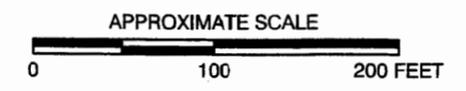
FIGURE

3



LEGEND

- ++++ ON-SITE RAILROAD SPUR
- [A] BUILDING DESIGNATION



NOTE: ALL DIMENSIONS, DIRECTIONS AND LOCATIONS ARE APPROXIMATE.

	PROJECT NO. 100213003	SITE PLAN	FIGURE 4
	DATE 12/11	14700 NELSON AVENUE (FRONT) CITY OF INDUSTRY, CALIFORNIA	

14700 Nelson Avenue (Front)
City of Industry, California

December 9, 2011
Project No. 100213003

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: 100213003; 14700
 EML ID: 852685

Approved by:

Dates of Analysis:
Asbestos-EPA Method 600/R-93/116: 11-10-2011

Miguel Constantino Ines

Technical Manager
Miguel Ines

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

All samples were received in acceptable condition unless noted in the Report Comments portion in the body of the report. The results relate only to the items tested. The results include an inherent uncertainty of measurement associated with estimating percentages by polarized light microscopy. Measurement uncertainty data can be provided when requested.

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

Document Number: 200091 - Revision Number: 5

Client: Ardent Environmental Group, Inc.
 C/O: Mr. Craig Metheny
 Re: 100213003; 14700

Date of Sampling: 11-07-2011
 Date of Receipt: 11-07-2011
 Date of Report: 11-10-2011

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

Total Samples Submitted: 38
Total Samples Analysed: 38

Total Samples with Layer Asbestos Content > 1%: 9

Location: 1, Drywall and Joint Compound

Lab ID-Version‡: 3784002-1

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

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

Location: 2, Drywall and Joint Compound

Lab ID-Version‡: 3784003-1

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

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

Location: 3, Drywall and Joint Compound

Lab ID-Version‡: 3784004-1

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

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

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".

Client: Ardent Environmental Group, Inc.
C/O: Mr. Craig Metheny
Re: 100213003; 14700Date of Sampling: 11-07-2011
Date of Receipt: 11-07-2011
Date of Report: 11-10-2011**ASBESTOS PLM REPORT: EPA-600/M4-82-020 & EPA METHOD 600/R-93-116****Location: 4, Drywall and Joint Compound**

Lab ID-Version‡: 3784005-1

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

Location: 5, Drywall and Joint Compound

Lab ID-Version‡: 3784006-1

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

Location: 6, Drywall and Joint Compound

Lab ID-Version‡: 3784007-1

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

Location: 7, Drywall and Joint Compound

Lab ID-Version‡: 3784008-1

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

Location: 8, Yellow Carpet Mastic

Lab ID-Version‡: 3784009-1

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

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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".

Client: Ardent Environmental Group, Inc.
 C/O: Mr. Craig Metheny
 Re: 100213003; 14700

Date of Sampling: 11-07-2011
 Date of Receipt: 11-07-2011
 Date of Report: 11-10-2011

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

Location: 9, Yellow Carpet Mastic

Lab ID-Version‡: 3784010-1

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

Location: 10, Yellow Carpet Mastic

Lab ID-Version‡: 3784011-1

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

Location: 11, Gray 12x12 VFT & Yellow Mastic

Lab ID-Version‡: 3784012-1

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

Location: 12, Gray 12x12 VFT & Yellow Mastic

Lab ID-Version‡: 3784013-1

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

Location: 13, Gray 12x12 VFT & Yellow Mastic

Lab ID-Version‡: 3784014-1

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

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

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

Inhomogeneous samples are separated into homogeneous subsamples and analyzed individually. ND means no fibers were detected. When detected, the minimum detection and reporting limit is less than 1% unless point counting is performed.

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

Client: Ardent Environmental Group, Inc.
C/O: Mr. Craig Metheny
Re: 100213003; 14700Date of Sampling: 11-07-2011
Date of Receipt: 11-07-2011
Date of Report: 11-10-2011**ASBESTOS PLM REPORT: EPA-600/M4-82-020 & EPA METHOD 600/R-93-116****Location: 14, Beige Vinyl Flooring & White Mastic**

Lab ID-Version‡: 3784015-1

Sample Layers	Asbestos Content
Beige Linoleum With Backing	20% Chrysotile
White Mastic	ND
Composite Non-Asbestos Fibrous Content:	5% Cellulose
Sample Composite Homogeneity:	Good

Location: 15, Beige Vinyl Flooring & White Mastic

Lab ID-Version‡: 3784016-1

Sample Layers	Asbestos Content
Beige Linoleum With Backing	20% Chrysotile
White Mastic	ND
Composite Non-Asbestos Fibrous Content:	5% Cellulose
Sample Composite Homogeneity:	Good

Location: 16, Dark Gray 12x12 VFT & Yellow Mastic

Lab ID-Version‡: 3784017-1

Sample Layers	Asbestos Content
Beige Linoleum With Backing	20% Chrysotile
White Mastic	ND
Composite Non-Asbestos Fibrous Content:	5% Cellulose
Sample Composite Homogeneity:	Good

Location: 17, Dark Gray 12x12 VFT & Yellow Mastic

Lab ID-Version‡: 3784018-1

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

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

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

Inhomogeneous samples are separated into homogeneous subsamples and analyzed individually. ND means no fibers were detected. When detected, the minimum detection and reporting limit is less than 1% unless point counting is performed.

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

Client: Ardent Environmental Group, Inc.
 C/O: Mr. Craig Metheny
 Re: 100213003; 14700

Date of Sampling: 11-07-2011
 Date of Receipt: 11-07-2011
 Date of Report: 11-10-2011

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

Location: 18, Dark Gray 12x12 VFT & Yellow Mastic

Lab ID-Version‡: 3784019-1

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

Location: 19, Tan Mastic

Lab ID-Version‡: 3784020-1

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

Location: 20, Tan Mastic

Lab ID-Version‡: 3784021-1

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

Location: 21, Tan Mastic

Lab ID-Version‡: 3784022-1

Sample Layers	Asbestos Content
Tan Mastic	< 1% Chrysotile
Sample Composite Homogeneity: Good	

Location: 22, 2x4 Suspended Ceiling Tile

Lab ID-Version‡: 3784023-1

Sample Layers	Asbestos Content
White Ceiling Tile with White Surface	ND
Composite Non-Asbestos Fibrous Content:	40% Cellulose 30% Mineral wool
Sample Composite Homogeneity: Good	

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

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

Inhomogeneous samples are separated into homogeneous subsamples and analyzed individually. ND means no fibers were detected. When detected, the minimum detection and reporting limit is less than 1% unless point counting is performed.

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

Client: Ardent Environmental Group, Inc.
 C/O: Mr. Craig Metheny
 Re: 100213003; 14700

Date of Sampling: 11-07-2011
 Date of Receipt: 11-07-2011
 Date of Report: 11-10-2011

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

Location: 23, 2x4 Suspended Ceiling Tile

Lab ID-Version‡: 3784024-1

Sample Layers	Asbestos Content
White Ceiling Tile with White Surface	ND
Composite Non-Asbestos Fibrous Content:	40% Cellulose 30% Mineral wool
Sample Composite Homogeneity:	Good

Location: 24, 2x4 Suspended Ceiling Tile

Lab ID-Version‡: 3784025-1

Sample Layers	Asbestos Content
White Ceiling Tile with White Surface	ND
Composite Non-Asbestos Fibrous Content:	40% Cellulose 30% Mineral wool
Sample Composite Homogeneity:	Good

Location: 25, Dark Brown Mastic

Lab ID-Version‡: 3784026-1

Sample Layers	Asbestos Content
Dark Brown Mastic With Gray Fibrous Material	5% Chrysotile
Sample Composite Homogeneity:	Good

Location: 26, Dark Brown Mastic

Lab ID-Version‡: 3784027-1

Sample Layers	Asbestos Content
Dark Brown Mastic With Gray Fibrous Material	5% Chrysotile
Sample Composite Homogeneity:	Good

Location: 27, Dark Gray Vinyl Flooring & Yellow Mastic

Lab ID-Version‡: 3784028-1

Sample Layers	Asbestos Content
Dark Gray Floor Tile	ND
Yellow Mastic	ND
Composite Non-Asbestos Fibrous Content:	20% Cellulose
Sample Composite Homogeneity:	Good

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

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".

Client: Ardent Environmental Group, Inc.
C/O: Mr. Craig Metheny
Re: 100213003; 14700Date of Sampling: 11-07-2011
Date of Receipt: 11-07-2011
Date of Report: 11-10-2011**ASBESTOS PLM REPORT: EPA-600/M4-82-020 & EPA METHOD 600/R-93-116****Location: 28, Dark Gray Vinyl Flooring & Yellow Mastic**

Lab ID-Version‡: 3784029-1

Sample Layers	Asbestos Content
Dark Gray Floor Tile	ND
Yellow Mastic	ND
Composite Non-Asbestos Fibrous Content:	20% Cellulose
Sample Composite Homogeneity:	Good

Location: 29, Gray Vinyl Flooring & White Mastic

Lab ID-Version‡: 3784030-1

Sample Layers	Asbestos Content
Gray Linoleum With Backing	20% Chrysotile
White Mastic	ND
Composite Non-Asbestos Fibrous Content:	5% Cellulose
Sample Composite Homogeneity:	Good

Location: 30, Gray Vinyl Flooring & White Mastic

Lab ID-Version‡: 3784031-1

Sample Layers	Asbestos Content
Gray Linoleum With Backing	20% Chrysotile
White Mastic	ND
Composite Non-Asbestos Fibrous Content:	5% Cellulose
Sample Composite Homogeneity:	Good

Location: 31, Tan Mastic

Lab ID-Version‡: 3784032-1

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

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

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

Inhomogeneous samples are separated into homogeneous subsamples and analyzed individually. ND means no fibers were detected. When detected, the minimum detection and reporting limit is less than 1% unless point counting is performed.

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

Client: Ardent Environmental Group, Inc.
C/O: Mr. Craig Metheny
Re: 100213003; 14700Date of Sampling: 11-07-2011
Date of Receipt: 11-07-2011
Date of Report: 11-10-2011**ASBESTOS PLM REPORT: EPA-600/M4-82-020 & EPA METHOD 600/R-93-116****Location: 32, Drywall And Joint Compound**

Lab ID-Version‡: 3784033-1

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

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

Location: 33, Cement Roof Shingle

Lab ID-Version‡: 3784034-1

Sample Layers	Asbestos Content
Gray Cementitious Material	20% Chrysotile
Sample Composite Homogeneity:	Good

Location: 34, Cement Roof Shingle

Lab ID-Version‡: 3784035-1

Sample Layers	Asbestos Content
Gray Cementitious Material	20% Chrysotile
Sample Composite Homogeneity:	Good

Location: 35, Roof Tar

Lab ID-Version‡: 3784036-1

Sample Layers	Asbestos Content
Black Roofing Felt With Tar	ND
Composite Non-Asbestos Fibrous Content:	40% Cellulose
Sample Composite Homogeneity:	Good

Location: 36, Roof Tar

Lab ID-Version‡: 3784037-1

Sample Layers	Asbestos Content
Black Roofing Felt With Tar	ND
Composite Non-Asbestos Fibrous Content:	40% Cellulose
Sample Composite Homogeneity:	Good

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

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".

Client: Ardent Environmental Group, Inc.
C/O: Mr. Craig Metheny
Re: 100213003; 14700Date of Sampling: 11-07-2011
Date of Receipt: 11-07-2011
Date of Report: 11-10-2011**ASBESTOS PLM REPORT: EPA-600/M4-82-020 & EPA METHOD 600/R-93-116****Location: 37, Composition Roof Shingle**

Lab ID-Version‡: 3784038-1

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

Location: 38, Composition Roof Shingle

Lab ID-Version‡: 3784039-1

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

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

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

Inhomogeneous samples are separated into homogeneous subsamples and analyzed individually. ND means no fibers were detected. When detected, the minimum detection and reporting limit is less than 1% unless point counting is performed.

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

CHAIN OF CUSTODY



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WEATHER	Fog	Rain	Snow	Wind	Clear
None					
Light					
Moderate					
Heavy					



000852685

REQUESTED SERVICES (✓ Boxes)

Culturable	Other Requests
BioCassette Andersen, SAS, Swab, Water, Bulk, Dust, Soil, Contact Plate	

CONTACT INFORMATION

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

PROJECT INFORMATION

Project ID: 100213003
Project Desc.: 14700 Nelson
Project: Sampling
Zip Code: 11/4/11
Date & Time: 11/4/11
PO Number:

TURN AROUND TIME CODES (TAD)

STD - Standard (DEFAULT)	Samples received after 2:00 PM on weekdays will be considered received the next business day. Please allow an advance of 24 hours for analysis needs.
ND - Next Business Day	
SD - Same Business Day Rush	
WH - Weekend/Holiday	

Sample ID	Description	Sample Type (600)	Total Volume (g)	Notes
13	Gray 12x12 VFT + Yellow Mastic	3	STD	
14	Beige vinyl flooring + white mastic			
15	Beige vinyl flooring + white mastic			
16	Beige vinyl flooring + white mastic			
17	Dark Gray 12x12 VFT + Yellow Mastic			
18	Dark Gray 12x12 VFT + Yellow Mastic			
19	Tan mastic			
20	Tan Mastic			
21	Tan Mastic			
22	2x4 suspended ceiling tile			
23	2x4 suspended ceiling tile	✓	✓	
24	2x4 suspended ceiling tile	✓	✓	

<input type="checkbox"/>	Fungi - Spore Trap Analysis
<input type="checkbox"/>	Spore Trap Analysis - Other particles
<input type="checkbox"/>	Direct Microscopic Exam (Qualitative)
<input type="checkbox"/>	Quantitative Spore Count Direct Exam
<input type="checkbox"/>	1-Media Surface Fungi (Genus ID + Asp. spp.)
<input type="checkbox"/>	2-Media Surface Fungi (Genus ID + Asp. spp.)
<input type="checkbox"/>	3-Media Surface Fungi (Genus ID + Asp. spp.)
<input type="checkbox"/>	Culturable Air Fungi (Genus ID + Asp. spp.)
<input type="checkbox"/>	Gram Stain and Counts (Culturable Air and Surface Bacteria)
<input type="checkbox"/>	Ligninella culture
<input type="checkbox"/>	Total Coliform, E.coli (Presence/Absence)
<input type="checkbox"/>	Membrane Filtration (Please specify organism)
<input type="checkbox"/>	MPN Bacteria (Please specify organism)
<input type="checkbox"/>	QuantTrap - Sewage Screen
<input type="checkbox"/>	Asbestos Analysis - PCM Airborne Fiber Count (NIOSH 7400)
<input type="checkbox"/>	Asbestos Analysis - PLM (EPA method 800/R-93-116)
<input type="checkbox"/>	PCR (please specify case)

SAMPLE TYPE CODES

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

REQUISITIONED BY

REQUISITIONED BY: *[Signature]* DATE & TIME: **11/4/11 4:10**

RECEIVED BY

RECEIVED BY: *[Signature]* DATE & TIME: **11/7/11 11:00**

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

WEATHER	Fog	Rain	Snow	Wind	Clear
None					
Light					
Moderate					
Heavy					

000852685

REQUESTED SERVICES (✓ Boxes)

able	Culturable	Other Requests
pe	BioCassette™ Anderson, SAS, Swab,	
ab	Water, Bulk, Dust, Soil, Contact Plate	
ulk		

CONTACT INFORMATION

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

PROJECT INFORMATION

Project ID: 100213003	STD - Standard (DEFAULT)
Project Desc.: 14700 Nelson	ND - Next Business Day
Project: Sampling	SD - Same Business Day Rush
Zip Code: 11/4/11	WH - Weekend/Holiday
PG Number:	

When received after 2pm on business days, samples will be considered received the next business day. Please alert us in advance of weekend analysis needs.

Sample ID	Description	Sample Type (Below)	Turnaround Code	Total Volume (if applicable)	NOTE
25	Dark brown mastic	B	STD		
26	Dark brown mastic				
27	Dark gray vinyl flooring & Yell. Mastic				
28	Dark gray vinyl flooring & Yell. Mastic				
29	Gray vinyl flooring & white mastic				
30	Gray vinyl flooring & white mastic				
31	Tan mastic				
32	Drywall incl Joint Compound				
33	Cement Roof Shingle				
34	Cement Roof Shingle				
35	Roof Tar				
36	Roof Tar				

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)	QuantTray - Sewage Screen	Acheson Analysis - PCM Airborne Fiber Count (NIOSH 7400)	Asbestos Analysis - PLM (EPA method 600/R-93-116)	PCR (please specify test)
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SAMPLE TYPE CODES

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

PREPARED BY	DATE & TIME	RECEIVED BY	DATE & TIME
<i>[Signature]</i>	11/4/11 440	<i>[Signature]</i>	11/7/11 11:02

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EMLab P&K

Report for:

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

Regarding: Project: 100213003; 14700
EML ID: 852685

Approved by:

Dates of Analysis:
Asbestos-EPA 1000 point count: 12-06-2011

Miguel Constantino Ines

Technical Manager
Miguel Ines

Service SOPs: Asbestos-EPA 1000 point count (EPA-600/M4-82-020 (SOP 01262))

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

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

Document Number: 200091 - Revision Number: 5

Client: Ardent Environmental Group, Inc.
C/O: Mr. Craig Metheny
Re: 100213003; 14700Date of Sampling: 11-07-2011
Date of Receipt: 11-07-2011
Date of Report: 12-06-2011**ASBESTOS POINT COUNT REPORT: EPA METHOD 600/R-93-116**

Location:	1 Drywall and Joint Compound		
Total Points Counted:	1000		
Lab ID-Version‡:	3823309-1		
Sample Layers	Asbestos Type	Asbestos Points Counted	Asbestos Concentration (%)
White Joint Compound With Paper Tape Layer Totals:	Chrysotile	0 0	< 0.1 NA
White Texture With Paint Layer Totals:	Chrysotile	1 1	0.1 0.1

Comments: This sample was analyzed without gravimetric reduction prior to point counting. It is recommended that the sample be further analyzed by gravimetric point counting.

Location:	2 Drywall and Joint Compound		
Total Points Counted:	1000		
Lab ID-Version‡:	3823310-1		
Sample Layers	Asbestos Type	Asbestos Points Counted	Asbestos Concentration (%)
White Joint Compound With Paper Tape Layer Totals:	Chrysotile	0 0	< 0.1 NA
White Texture With Paint Layer Totals:	Chrysotile	0 0	< 0.1 NA

Comments: Asbestos was detected, but no points counted. This sample was analyzed without gravimetric reduction prior to point counting. It is recommended that the sample be further analyzed by gravimetric point counting.

Location:	21 Tan Mastic		
Total Points Counted:	1000		
Lab ID-Version‡:	3823311-1		
Sample Layers	Asbestos Type	Asbestos Points Counted	Asbestos Concentration (%)
Tan Mastic Layer Totals:	Chrysotile	2 2	0.2 0.2

Comments: This sample was analyzed without gravimetric reduction prior to point counting. It is recommended that the sample be further analyzed by gravimetric point counting.

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

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

‡ 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".

Client: Ardent Environmental Group, Inc.
 C/O: Mr. Craig Metheny
 Re: 100213003; 14700

Date of Sampling: 11-07-2011
 Date of Receipt: 11-07-2011
 Date of Report: 12-06-2011

ASBESTOS POINT COUNT REPORT: EPA METHOD 600/R-93-116

Location:	32 Drywall And Joint Compound		
Total Points Counted:	1000		
Lab ID-Version‡:	3823312-1		
Sample Layers	Asbestos Type	Asbestos Points Counted	Asbestos Concentration (%)
White Joint Compound	Chrysotile	0	< 0.1
Layer Totals:		0	NA

Comments: Asbestos was detected, but no points counted. This sample was analyzed without gravimetric reduction prior to point counting. It is recommended that the sample be further analyzed by gravimetric point counting.

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

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

‡ 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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WEATHER	Fog	Rain	Snow	Wind	Clear
None					
Light					
Moderate					
Heavy					

000852685

REQUESTED SERVICES (✓ Boxes)

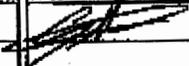
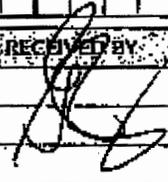
Culturable
BioCassette™ Andersen, SAS, Swab, Water, Bulk, Dust, Soil, Contact Plate
Other Requests

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

PROJECT INFORMATION		TURN/ROUND TIME CODES (TAU)	
Project ID: 100213003	STD - Standard (DEFAULT)	If received before 10:00 AM on the day of collection, will be considered received the next business day unless otherwise specified.	
Project Desc.: 14700 Nelson	ND - Next Business Day		
Project: Sampling	SD - Same Business Day Rush		
Zip Code: 11/4/11	WH - Weekend/Holiday		
PO Number:			

Sample ID	Description	Sample Type (Below)	TAU Code (Above)	Total Volume / Area (as applicable)	NOTES (Time, Temp, etc.)
1	Drywall and Joint Compound	B	STD		
2	Drywall and Joint Compound				
3	Drywall and Joint Compound				
4	Drywall and Joint Compound				
5	Drywall and Joint Compound				
6	Drywall and Joint Compound				
7	Drywall and Joint Compound				
8	Yellow Carpet Mastic				
9	Yellow Carpet Mastic				
10	Yellow Carpet Mastic				
11	Gray 12x12 VFT & Yellow Mastic				
12	Gray 12x12 VFT & Yellow Mastic				

Fungi - Spore Trap Analysis	Spore Trap Analysis - Other particles	Direct Microscopic Exam (Qualitative)	Quantitative Spore Count Direct Exam	1-Media Surface Fungi (Genus ID + Sp. spp.)	2-Media Surface Fungi (Genus ID + Sp. spp.)	3-Media Surface Fungi (Genus ID + Sp. spp.)	Culturable Air Fungi (Genus ID + Sp. 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)
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SAMPLE TYPE CODES				RETIQUISHED BY	DATE & TIME	RECEIVED BY	DATE & TIME
BC - BioCassette™	ST - Spore Trap: Zefon,	T - Tape	D - Dust		11/4/11 4:10		11/7/11
AIS - Andersen	Allergenco, Burkard...	SW - Swab	SO - Soil				
SAS - Surface Air Sampler	P - Potable Water	B - Bulk					
CP - Contact Plate	NP - Non-Potable Water	O - Other:					

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Weather:	Fog	Rain	Snow	Wind	Clear
None					
Light					
Moderate					
Heavy					



REQUESTED SERVICES (Boxes)

Culturable

BioCassette™ Andersen, SAS, Swab, Water, Bulk, Dust, Soil, Contact Plate

Other Requests

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

CONTACT INFORMATION

Company: Ardent Environmental Address:

Contact: Craig Metheny Special Instructions:

Phone:

PROJECT INFORMATION

Project ID: 100213003

Project Desc.: 14700 Nelson

Project: Sampling Date & Time: 11/4/11

Zip Code:

PO Number:

TURN AROUND TIME CODES

STD - Standard (DEFAULT)

ND - Next Business Day

SD - Same Business Day Rush

WH - Weekend/Holiday

ID	Description	Sample Type (Below)	Turn Around Time	Notes
13	Gray 12x12 VFT & Yellow Mastic	B	STD	
14	Beige vinyl flooring & white mastic			
15	Beige vinyl flooring & white mastic			
16	Beige vinyl flooring & white mastic			
17	Dark Gray 12x12 VFT & Yellow Mastic			
18	Dark Gray 12x12 VFT & Yellow Mastic			
19	Tan mastic			
20	Tan Mastic			
21	Tan Mastic			
22	2x4 suspended ceiling tile			
23	2x4 suspended ceiling tile			
24	2x4 suspended ceiling tile			

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)	QuantTray - Sewage Screen	Asbestos Analysis - PCM Airborne Fiber Count (NIOSH 7400)	Asbestos Analysis - PLM (EPA method 600/R-93-116)	PCR (please specify assay)
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SAMPLE TYPE CODES				ACQUIRED BY	DATE & TIME
BC - BioCassette™	ST - Spore Trap: Zefon, Allergenco, Burkard...	T - Tape	D - Dust	<i>[Signature]</i>	11/4/11 4:10
AIS - Andersen	P - Potable Water	SW - Swab	SO - Soil		
SAS - Surface Air Sampler	NP - Non-Potable Water	B - Bulk	O - Other:		
CP - Contact Plate					

RECEIVED BY	DATE & TIME
<i>[Signature]</i>	11/7/11
	11:00

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EMLab P&K

Report for:

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

Regarding: Project: 100213003; 14700-Front
 EML ID: 854502

Approved by:

Dates of Analysis:
Asbestos-EPA Method 600/R-93/116: 11-16-2011

Miguel Constantino Ines

Technical Manager
Miguel Ines

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

All samples were received in acceptable condition unless noted in the Report Comments portion in the body of the report. The results relate only to the items tested. The results include an inherent uncertainty of measurement associated with estimating percentages by polarized light microscopy. Measurement uncertainty data can be provided when requested.

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

Document Number: 200091 - Revision Number: 5

Client: Ardent Environmental Group, Inc.
 C/O: Mr. Craig Metheny
 Re: 100213003; 14700-Front

Date of Sampling: 11-08-2011
 Date of Receipt: 11-10-2011
 Date of Report: 11-16-2011

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

Total Samples Submitted: 21

Total Samples Analysed: 21

Total Samples with Layer Asbestos Content > 1%: 10

Location: 39, Tar paper

Lab ID-Version‡: 3791449-1

Sample Layers	Asbestos Content
Black Tar Paper	ND
Composite Non-Asbestos Fibrous Content:	70% Cellulose
Sample Composite Homogeneity:	Moderate

Location: 40, Tar paper

Lab ID-Version‡: 3791450-1

Sample Layers	Asbestos Content
Black Tar Paper	ND
Composite Non-Asbestos Fibrous Content:	70% Cellulose
Sample Composite Homogeneity:	Moderate

Location: 41, Rolled roof core

Lab ID-Version‡: 3791451-1

Sample Layers	Asbestos Content
Black Roofing Material Composite	2% Chrysotile
Composite Non-Asbestos Fibrous Content:	30% Glass Fibers 20% Cellulose
Sample Composite Homogeneity:	Moderate

Location: 42, Rolled roof core

Lab ID-Version‡: 3791452-1

Sample Layers	Asbestos Content
Black Roofing Material Composite	2% Chrysotile
Composite Non-Asbestos Fibrous Content:	30% Glass Fibers 20% Cellulose
Sample Composite Homogeneity:	Moderate

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

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

Inhomogeneous samples are separated into homogeneous subsamples and analyzed individually. ND means no fibers were detected. When detected, the minimum detection and reporting limit is less than 1% unless point counting is performed.

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

Client: Ardent Environmental Group, Inc.
C/O: Mr. Craig Metheny
Re: 100213003; 14700-FrontDate of Sampling: 11-08-2011
Date of Receipt: 11-10-2011
Date of Report: 11-16-2011**ASBESTOS PLM REPORT: EPA-600/M4-82-020 & EPA METHOD 600/R-93-116****Location: 43, Black roof mastic**

Lab ID-Version‡: 3791453-1

Sample Layers	Asbestos Content
Black Roofing Mastic	ND
Composite Non-Asbestos Fibrous Content:	5% Wollastonite
Sample Composite Homogeneity:	Moderate

Location: 44, Black roof mastic

Lab ID-Version‡: 3791454-1

Sample Layers	Asbestos Content
Black Roofing Mastic	ND
Composite Non-Asbestos Fibrous Content:	5% Wollastonite
Sample Composite Homogeneity:	Moderate

Location: 45, Gray roof mastic

Lab ID-Version‡: 3791455-1

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

Location: 46, Gray roof mastic

Lab ID-Version‡: 3791456-1

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

Location: 47, Dark gray roof mastic

Lab ID-Version‡: 3791457-1

Sample Layers	Asbestos Content
Black Mastic	5% Chrysotile
Sample Composite Homogeneity:	Moderate

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

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‡ 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".

Client: Ardent Environmental Group, Inc.
C/O: Mr. Craig Metheny
Re: 100213003; 14700-FrontDate of Sampling: 11-08-2011
Date of Receipt: 11-10-2011
Date of Report: 11-16-2011**ASBESTOS PLM REPORT: EPA-600/M4-82-020 & EPA METHOD 600/R-93-116****Location: 48, Dark gray roof mastic**

Lab ID-Version‡: 3791458-1

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

Location: 49, Gray mastic

Lab ID-Version‡: 3791459-1

Sample Layers	Asbestos Content
Light Gray Mastic	ND
Sample Composite Homogeneity:	Moderate

Location: 50, Gray mastic

Lab ID-Version‡: 3791460-1

Sample Layers	Asbestos Content
Light Gray Mastic	ND
Sample Composite Homogeneity:	Moderate

Location: 51, Dark gray roof mastic

Lab ID-Version‡: 3791461-1

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

Location: 52, Gray roof mastic

Lab ID-Version‡: 3791462-1

Sample Layers	Asbestos Content
Gray/Black Roofing Mastic	ND
Composite Non-Asbestos Fibrous Content:	15% Cellulose
Sample Composite Homogeneity:	Moderate

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

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

Inhomogeneous samples are separated into homogeneous subsamples and analyzed individually. ND means no fibers were detected. When detected, the minimum detection and reporting limit is less than 1% unless point counting is performed.

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

Client: Ardent Environmental Group, Inc.
 C/O: Mr. Craig Metheny
 Re: 100213003; 14700-Front

Date of Sampling: 11-08-2011
 Date of Receipt: 11-10-2011
 Date of Report: 11-16-2011

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

Location: 53, Rolled roof core

Lab ID-Version‡: 3791463-1

Sample Layers	Asbestos Content
Black Roofing Shingle with White Gravel	ND
Black Roofing Felt with Tar (sublayer 1)	ND
Black Roofing Felt with Tar (sublayer 2)	ND
Composite Non-Asbestos Fibrous Content:	40% Glass Fibers 10% Cellulose
Sample Composite Homogeneity:	Moderate

Location: 54, Rolled roof core

Lab ID-Version‡: 3791464-1

Sample Layers	Asbestos Content
Black Roofing Shingle with White Gravel	ND
Black Roofing Felt with Tar (sublayer 1)	ND
Black Roofing Felt with Tar (sublayer 2)	ND
Composite Non-Asbestos Fibrous Content:	40% Glass Fibers 10% Cellulose
Sample Composite Homogeneity:	Moderate

Location: 55, Silver mastic

Lab ID-Version‡: 3791465-1

Sample Layers	Asbestos Content
Black Mastic with Silver Paint	5% Chrysotile
Sample Composite Homogeneity:	Good

Location: 56, Silver mastic

Lab ID-Version‡: 3791466-1

Sample Layers	Asbestos Content
Black Mastic with Silver Paint	ND
Composite Non-Asbestos Fibrous Content:	5% Cellulose
Sample Composite Homogeneity:	Good

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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".

Client: Ardent Environmental Group, Inc.
C/O: Mr. Craig Metheny
Re: 100213003; 14700-Front

Date of Sampling: 11-08-2011
Date of Receipt: 11-10-2011
Date of Report: 11-16-2011

ASBESTOS PLM REPORT: EPA-600/M4-82-020 & EPA METHOD 600/R-93-116**Location: 57, Silver mastic**

Lab ID-Version‡: 3791467-1

Sample Layers	Asbestos Content
Black Mastic with Silver Paint	5% Chrysotile
Sample Composite Homogeneity:	Good

Location: 58, Drywall and joint compound

Lab ID-Version‡: 3791468-1

Sample Layers	Asbestos Content
White Non-Fibrous Material with Paint	2% Chrysotile
White Joint Compound under Tape	< 1% Chrysotile
White Drywall	ND
Composite Asbestos Fibrous Content:	< 1% Asbestos
Composite Non-Asbestos Fibrous Content:	5% Cellulose
Sample Composite Homogeneity:	Moderate

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

Location: 59, Layered roof

Lab ID-Version‡: 3791469-1

Sample Layers	Asbestos Content
Black Roofing Shingle with Brown/Beige Gravel	ND
Black Roofing Felt with Tar	ND
Composite Non-Asbestos Fibrous Content:	35% Glass Fibers 20% Cellulose
Sample Composite Homogeneity:	Moderate

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

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‡ 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".

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

WEA	Fog	rain	Snow	Wind	Clear
None					
Light					
Moderate					
Heavy					

REQUESTED

Non-Culturable

Spore Trap
Tape Swab
Bulk

BioCassette
Water, Bulk,

000854502

CONTRACT INFORMATION

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

PROJECT INFORMATION

Project ID: 100213003
 Project Desc.: 14700 - Front
 Project: _____
 Zip Code: _____ Date & Time: 11/8/11
 PO Number: _____

TURNAROUND TIME CODES (TAT)

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

Sample ID	Sample Description	Sample Type Code	Turnaround Code	Analysis Requested
39	Tar Paper	B	STD	
40	Tar Paper			
41	Rolled Roof Core			
42	Rolled Roof Core			
43	Black Roof Mastic			
44	Black Roof Mastic			
45	Gray Roof Mastic			
46	Gray Roof Mastic			
47	Dark Gray Roof Mastic			
48	Dark Gray Roof Mastic			
49	Gray Mastic			
50	Gray Mastic			

Analysis Requested	Requested
Fungi - Spore Trap Analysis	
Spore Trap Analysis - Other particles	
Direct Microscopic Exam (Qualitative)	
Quantitative Spore Count Direct Exam	
1-Media Surface Fungi (Genus ID + Sp. spp.)	
2-Media Surface Fungi (Genus ID + Sp. spp.)	
3-Media Surface Fungi (Genus ID + Sp. spp.)	
Culturable Air Fungi (Genus ID + Sp. 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)	X
Asbestos Analysis - PLM (EPA method 800/R-93-116)	X
PCR (please specify test)	X

SAMPLE TYPE CODES				ACQUISITION BY	DATE & TIME	RECEIVED BY	DATE & TIME
BC - BioCassette	ST - Spore Trap: Zefon, Allergenco, Burkard...	T - Tape	D - Disc	<i>[Signature]</i>	11/9/11 4:50	<i>[Signature]</i>	11/10/11 9:25
A15 - Andersen		SW - Swab	SD - Soil				
SAS - Surface Air Sampler	P - Potable Water	B - Bulk					
CP - Contact Plate	NP - Non-Potable Water	O - Other:					

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

None					
Light					
Moderate					
Heavy					

Non-Culturable		Cultured	
Spore Trap	Tape Swab Bulk	BioCassette™ Andersen Water, Bulk, Dust, Soil	

CONTACT INFORMATION

Company: <u>Ardent Environmental</u>	Address:
Contact: <u>Craig Metheny</u>	Special Instructions:
Phone:	

PROJECT INFORMATION

Project ID: <u>100213003</u>	STD - Standard (DEFAULT)
Project Desc: <u>14700 - Front</u>	ND - Next Business Day
Project: <u>Sampling</u>	SD - Same Business Day Rush
Zip Code: <u>11/8/11</u>	WH - Weekend/Holiday
PO Number:	

Sample ID	Description	Matrix	STD	Notes
51	Dark Gray Roof Mastic	B	STD	
52	Gray Roof Mastic			
53	Roller roof core			
54	Roller roof core			
55	Silver Mastic			
56	Silver Mastic			
57	Silver Mastic			
58	Oxywll & Joint Compound			
59	Lyceral Roof			

Fungi - Spore Trap Analysis	
Spore Trap Analysis - Other particles	
Direct Microscopic Exam (Qualitative)	
Quantitative Spore Count Direct Exam	
1-Media Surface Fungi (Genus ID + Sp. spp.)	
2-Media Surface Fungi (Genus ID + Sp. spp.)	
3-Media Surface Fungi (Genus ID + Sp. spp.)	
Culturable Air Fungi (Genus ID + Sp. 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)	
QuantTray - Sewage Screen	
Asbestos Analysis - PCM Airborne Fiber Count (NIOSH 7400)	
Asbestos Analysis - PLM (EPA method 600/R-93-116)	
PCR (please specify test)	

BC - BioCassette™	ST - Spore Trap: Zefon,	T - Tape	D - Dust
A15 - Andersen	Allergenco, Burkard...	SW - Swab	SO - Soil
SAS - Surface Air Sampler	P - Potable Water	B - Bulk	
CP - Contact Plate	NP - Non-Potable Water	O - Other:	

DATE/TIME	4/9/11 4:00
-----------	-------------

RECEIVED BY	DATE & TIME
<i>[Signature]</i>	11/01/11
	9:35

Page 2 of 2

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EMLab P&K

Report for:

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

Regarding: Project: 100213003; 14700 Nelson - Front
EML ID: 858936

Approved by:

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

Miguel Constantino Ines

Technical Manager
Miguel Ines

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

All samples were received in acceptable condition unless noted in the Report Comments portion in the body of the report. The results relate only to the items tested. The results include an inherent uncertainty of measurement associated with estimating percentages by polarized light microscopy. Measurement uncertainty data can be provided when requested.

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

Document Number: 200091 - Revision Number: 5

Client: Ardent Environmental Group, Inc.
C/O: Mr. Craig Metheny
Re: 100213003; 14700 Nelson - FrontDate 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%:** 3**Location: 60, Layered Roof Core**

Lab ID-Version‡: 3811309-1

Sample Layers	Asbestos Content
Black Roofing Material With Gravels	ND
Composite Non-Asbestos Fibrous Content:	40% Glass Fibers 10% Cellulose
Sample Composite Homogeneity:	Good

Location: 61, Layered Roof Core

Lab ID-Version‡: 3811310-1

Sample Layers	Asbestos Content
Black Roofing Material With Gravels	ND
Composite Non-Asbestos Fibrous Content:	40% Glass Fibers 20% Cellulose
Sample Composite Homogeneity:	Good

Location: 62, Gray Mastic

Lab ID-Version‡: 3811311-1

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

Location: 63, Gray Mastic

Lab ID-Version‡: 3811312-1

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

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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".

Client: Ardent Environmental Group, Inc.
C/O: Mr. Craig Metheny
Re: 100213003; 14700 Nelson - Front

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: 64, Gray Mastic**

Lab ID-Version‡: 3811313-1

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

Location: 65, Layered Roof Core

Lab ID-Version‡: 3811314-1

Sample Layers	Asbestos Content
Black Roofing Material With Gravels	ND
Composite Non-Asbestos Fibrous Content:	40% Glass Fibers 20% Cellulose
Sample Composite Homogeneity:	Good

Location: 66, Layered Roof Core

Lab ID-Version‡: 3811315-1

Sample Layers	Asbestos Content
Black Roofing Material With Gravels	ND
Composite Non-Asbestos Fibrous Content:	40% Glass Fibers 20% Cellulose
Sample Composite Homogeneity:	Good

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 San Bruno, CA: 1150 Bayhill Drive, #100, San Bruno, CA 94066 * (856) 888-6653

WEATHER	Fog	Rain	Snow	Wind	Clear
None					
Light					
Moderate					
Heavy					



REQUESTED SERVICES 00858936

CONTACT INFORMATION	
Company: Aradent Environmental Group	Address:
Contact: Craig Matheny	Special Instructions:
Phone:	

PROJECT INFORMATION		TURN AROUND TIME (TAT) - DAY	
Project ID: 100213003	STD - Standard (DEFAULT)	Samples received after 2pm on any weekdays will be expedited and received the next business day. Please alert us in advance of weekend analysis needs.	
Project Desc.: 14700 Nelson - Front	ND - Next Business Day		
Project Zip Code: Sampling Date & Time:	SD - Same Business Day Rush		
PO Number:	WH - Weekend/Holiday		

Sample ID	Description	Sample Type (Abbrev)	TAT (Days)	Notes
60	Layered Roof Core	B	STD	
61	Layered Roof Core			
62	Gray Mastic			
63	Gray Mastic			
64	Gray Mastic			
65	Layered Roof Core			
66	Layered Roof Core			

Non-Culturable		Culturable	
Spore Trap	Tape Swab Bulk	BioCassette™ Andersen, SAS, Swab, Water, Bulk, Dust, Soil, Contact Place	Other Requests
Fungi - Spore Trap Analysis	Spore Trap Analysis - Other particles	Legionella culture	
Direct Microscopic Exam (Qualitative)	Quantitative Spore Count Direct Exam	Total Coliform, E.coli (Presence/Absence)	
1-Media Surface Fungi (Genus ID + App. spp.)	2-Media Surface Fungi (Genus ID + App. spp.)	Membrane Filtration (Please specify organism)	
3-Media Surface Fungi (Genus ID + App. spp.)	Culturable Air Fungi (Genus ID + App. spp.)	MPN Bacteria (Please specify organism)	
	Gram Stain and Counts (Culturable Air and Surface Bacteria)	QuantTray - Sewage Screen	
		Asbestos Analysis - PCM Airborne Fiber Count (NIOSH 7400)	
		Asbestos Analysis - PLM (EPA method 600/R-93-116)	
		PCR (please specify PCR)	

SAMPLE TYPE CODES				RECEIVED BY		DATE & TIME	
BC - BioCassette™	ST - Spore Trap; Zefon,	T - Tape	D - Disc	<i>[Signature]</i>	11/21/11 3:30	<i>[Signature]</i> 11-22-11 11:00	
A15 - Andersen	Allergenco, Burkard...	SW - Swab	SO - Soil				
SAS - Surface Air Sampler	P - Potable Water	B - Bulk					
CP - Contact Place	NP - Non-Potable Water	O - Other:					

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14700 Nelson Avenue (Front)
City of Industry, California

December 9, 2011
Project No. 100213003

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: 02/28/2013

Signature: *Paul Roberts*



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SACRAMENTO, CA 95833-2944
916/283-2222



REGISTERED GEOLOGIST

CERTIFICATE NO. 6897
EXPIRATION 01/31/12

PAUL ALEXANDER ROBERTS
3415 BELGIAN DR
NORCO CA 92680

Paul Roberts

Signature

RECEIPT NO. 00010488





December 9, 2011
Project No. 100213003

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
14700 Nelson Avenue (Front)
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 14700 Nelson Avenue, City of Industry, California (site). Suspect miscellaneous hazardous building materials include polychlorinated biphenyl (PCB)-containing light fixture ballasts, fluorescent light tubes (FLT), 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 10-01 #2.

BUILDING LOCATION AND DESCRIPTION

The site is located at 14700 Nelson Avenue in the City of Industry, Los Angeles County, California. The site is located on the southern side of Nelson Avenue, approximately 540 feet southeast of the intersection of Sunset Avenue and Nelson Avenue. The site has been assigned the Tax Assessor's Parcel Number (APN) 8208-006-900 and contains eight commercial buildings.

The site consists of a rectangular shaped property comprising approximately 3.8 acres. The site is currently vacant and contains one approximately 6,000 square foot office building with a ware-

house structure attached, six lumber storage canopy structures, and one shed. The buildings were constructed in 1970.

SURVEY RESULTS

Ardent performed a visual survey of the building on November 8, 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.

The quantity of PCB-containing fluorescent light fixture ballasts was estimated by Ardent by random spot checks within each room of the building. Ardent recommends that all light 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

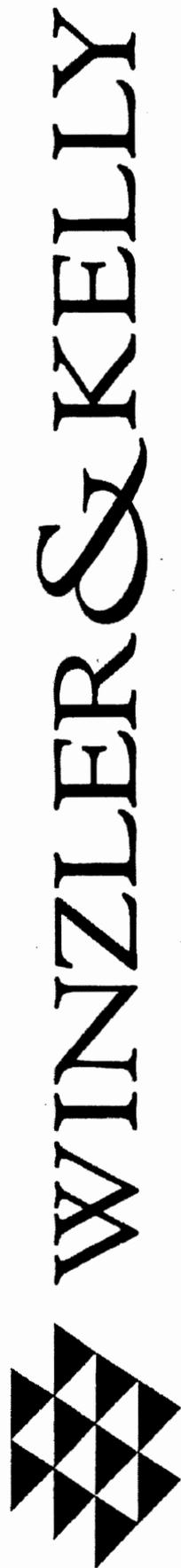
Attachments: Table 1 – Universal Wastes/Miscellaneous Materials

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 Ballasts	PCBs	Bldg. A – Office and Warehouse	230
Fluorescent Light Tubes	Mercury	Bldg. A – Office and Warehouse	550 – 4 ft long 2 – U-Shape 6 – 3 ft long
Air Conditioning Units	Freon or CFC gases	Roof	5
Mercury Vapor Lamps	Mercury	Bldg. A - Warehouse	21
Thermostat Switches	Mercury	Bldg. A - Office	3
Exit Signs and Thermostats	Batteries	Throughout Building	3
PCB – polychlorinated biphenyls CFC – Chlorofluorocarbons			





PRE-DEMOLITION
LEAD TESTING SERVICES REPORT

Project Site:

Former Lumber Yard
14700 East Nelson Avenue (Front)
City of Industry, California 91744

Prepared For:

Mr. Craig Metheny
ARDENT ENVIRONMENTAL GROUP, INC.
1141 Pomona Road, Suite E
Corona, California 92882

Prepared By:

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

W&K Project Number: 1156011008.77010

November 10, 2011

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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 14700 East Nelson Avenue (Front) in the City of Industry, County of Los Angeles, California.

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

Physical limitations, such as locked rooms and fenced areas, were not encountered during the survey and testing activities. There is a possibility that additional hazardous materials may be encountered in inaccessible areas (e.g., interstitial wall and ceiling 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 14700 EAST NELSON AVENUE (FRONT) CITY OF INDUSTRY			
MATERIAL/COMPONENT DESCRIPTION	LOCATION	CONDITION	ESTIMATED TOTAL QUANTITY (SF/LF/EA)
Lead-Based Paints/ Lead-Bearing Substances <u>(Color/Substrate/Component):</u>			
White/Ceramic/Floor	Building 1, Room 1 Int.	Intact	12 SF
Brown/Metal/Floor Drain	Building 1, Rooms 6 and 7 Int.	Intact	2 EA
Red/Metal/Pipe	Building 3 Exterior	Intact	15 LF
Gray/Metal/Wall	Building 4 Exterior	Intact	1,000 SF
Red/Metal/Ceiling+Wall	Building 4 Interior	Intact	1,320 SF
Yellow/Asphalt/Floor Stripe	Bldg 1, Lumber Storage Ext.	Fair	60 LF
Red/Metal/Cabinet	Building 5 Exterior	Intact	10 SF
Yellow/Metal/Fire Hydrant	Building 6 Exterior	Intact	1 EA
Red/Metal/Cabinet	Building 3 Exterior	Intact	1 EA
Red/Metal/Cabinet	Building 8 Exterior	Intact	1 EA
Note 1 Lead-Containing Surface Coatings Detected: Refer to the XRF Lead Data Table in Appendix C			

FORMER LUMBER YARD 14700 EAST NELSON AVENUE (FRONT) CITY OF INDUSTRY			
MATERIAL/COMPONENT DESCRIPTION	LOCATION	CONDITION	ESTIMATED TOTAL QUANTITY (SF/LF/EA)
Notes: SF = square feet EA = each LF = linear feet <u>Lead-Based Paint</u> = 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 <u>Lead-Containing Surface Coatings</u> = 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. <u>Lead-Bearing Substances</u> = 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**, **LBSs**, 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 contaminants. Without air monitoring results or without the benefit of historical or objective data (including air sampling which clearly demonstrates that the employee can not be exposed above the action level during any process, operation, or activity) the analysis of bulk or surface samples can not be used to determine employee exposure.” OSHA Standard Interpretation 5/8/2000.

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

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

- ◆ Any welding, cutting or heating of metal surfaces containing surface coatings should be conducted in accordance with 29 CFR 1926.354 and 8 CCR 1537. These regulations require surfaces covered with toxic preservatives, and in enclosed areas, be stripped of all toxic coatings for a distance of at least 4 inches, in all directions, from the area of heat application prior to the initiation of such heat application.
- ◆ Cal/EPA through the Division of Toxic Substance Control (DTSC) regulates disposal of lead hazardous waste (Title 22 Division 4.5, Environmental Health Standards for the Management of Hazardous Waste). DTSC has issued guidance indicating that architectural debris with intact lead paint is normally expected to be handled as general construction waste. However, waste stream segregation and analysis is still required for all paint or coating debris regardless of if the paint or coating is intact on a building component or not. The resulting wastes may be hazardous under California and federal RCRA standards for lead and therefore require proper handling, packaging, labeling, and transportation under a proper manifest to a permitted hazardous waste storage, treatment and disposal facility.

- ◆ **CDPH:** The CDPH has specific requirements (Title 17 Sections 35001 thru 36100 et. al.) for hazard assessment and work in public or residential structures. These regulations require special certifications, work practices, and notification for such activities.
- ◆ **Senate Bill 460 (SB 460):** An act to amend Section 1941.1 of the Civil Code, and to amend Sections 17961, 17980, and 124130 of, and to add Sections 17920.10, 105251, 105252, 105253, 105254, 105255, 105256, and 105257 to, the Health and Safety Code, relating to lead abatement. This bill allows for fines and criminal penalties to be levied on any person who is found to have performed lead abatement without containment or created a measurable lead hazard based upon current CDPH standards. The testing for this determination can be initiated by any local or state building inspector, health department inspector, or other designated state or local official. A determination of a lead hazard is not solely based upon the lead content of the paint or coating and can be the result of the disturbance of such materials with low concentrations of lead.

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

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

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

Report prepared for Ardent by:



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

Report reviewed and signed for Ardent by:



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

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 14700 East Nelson Avenue (Front) 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 26, 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 14700 East Nelson Avenue (Front) 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 6,000 square feet in size, and the other structures were lumber yard storage structures and a shed. The building and structures were either wood-frame and/or metal-frame that consisted of floors finished with vinyl tile, carpet, ceramic tile or sheet flooring; interior walls finished with wallboard (drywall)/joint compound or ceramic tile; interior ceilings finished with drywall/joint compound or acoustic panels; and/or roofs consisted of built-up roofing materials.

Physical limitations, such as locked rooms and fenced areas, were not encountered during the survey and testing activities. There is a possibility that additional hazardous materials may be encountered in inaccessible areas (e.g., interstitial wall and ceiling 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 $0.1 \text{ mg}/\text{cm}^2$ or greater, up to $0.7 \text{ mg}/\text{cm}^2$.
3. Negative results (LCSCs not present) were determined when analytical results revealed a lead concentration of less than $0.1 \text{ mg}/\text{cm}^2$ 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 245 XRF measurements (with calibration readings) for the determination of lead content were collected from the subject site building on October 26, 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** and **LBSs** 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):

14700 East Nelson Avenue (Front)

1. White/Ceramic/Floor
2. Brown/Metal/Floor Drain
3. Red/Metal/Pipe
4. Gray/Metal/Wall
5. Red/Metal/Ceiling and Wall
6. Yellow/Asphalt/Floor Stripe
7. Red/Metal/Cabinet
8. Yellow/Metal/Fire Hydrant

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**, **LBSs**, 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:

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APPENDIX A
CERTIFICATIONS

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**

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	01/07/2012

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



Jerry R. Sherman ID #: 5809

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

State of California Department of Public Health

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

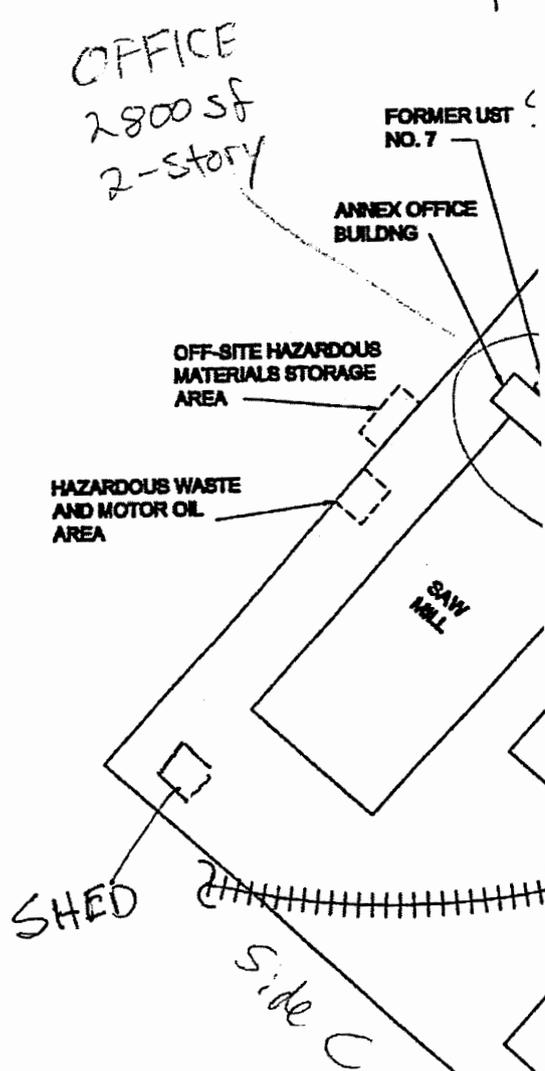


Michael F. Toomey

ID #: **21344**

APPENDIX B
LEAD TESTING MAP

Inzler and Kelly
D TESTING MAP



LEGEND

- UST UNDERGROUND STORAGE TANK
- AST ABOVEGROUND STORAGE TANK
- [Dashed Box] APPROXIMATE LOCATION OF ENVIRONMENTAL CONCERN
- [Cross-hatch] ON-SITE RAILROAD SPUR
- LBP Lead-Based Paint, positive XRF Reading
- Sides A-D Lead testing orientation



NOTE: ALL DIMENSIONS, DIRECTIONS AND LOCATIONS ARE APPROXIMATE.

SITE PLAN

4700 EAST NELSON AVENUE
 CITY OF INDUSTRY, CALIFORNIA

FIGURE

1 of 2

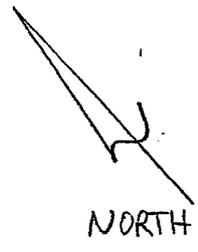
Wintel and Kelly
Lead Testing Map

LBS
white/ceramic/ floor
A

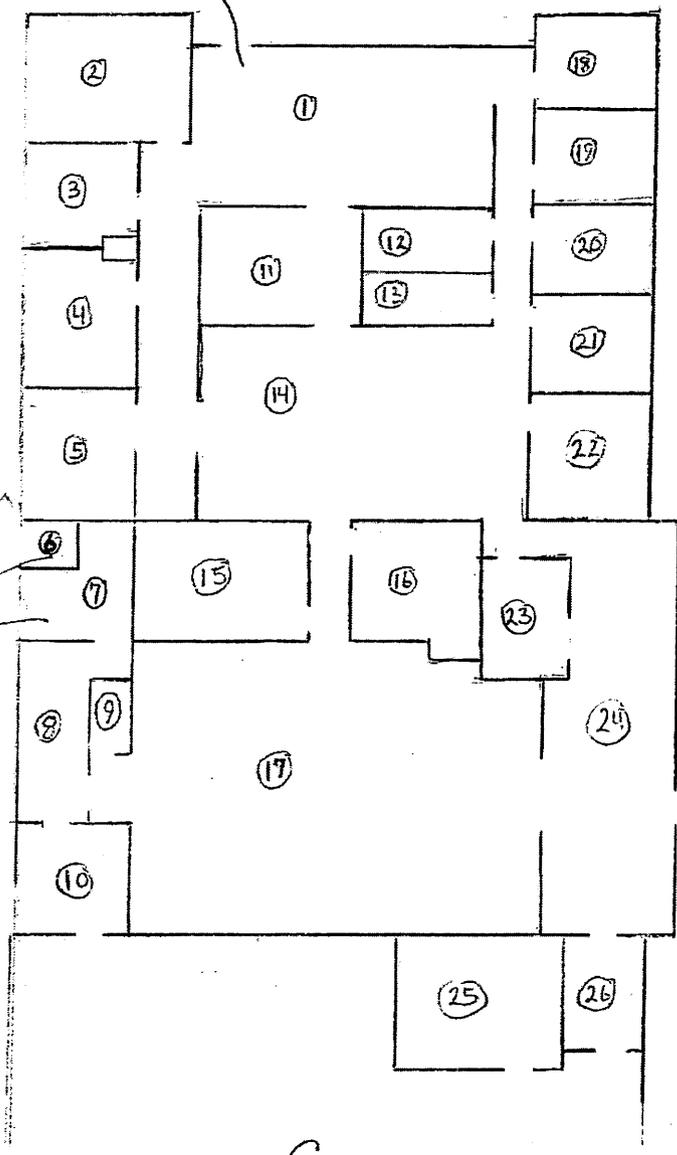
LEGEND

- ① Room Number
- LBS Lead-bearing Substance
- Side A-B Lead testing orientation

LBS
Brown/ Metal/ Floor-
driven



1" = 20'



B

C

Project No.
INSULATOR P.
Date
11/11

BUILDING 1
14700 Nelson Avenue (FRONT)
City of Industry, California

Figure
2 of 2

APPENDIX C
XRF LEAD DATA TABLE

14700 EAST NELSON AVENUE (FRONT), CITY OF INDUSTRY, CA												
READING NO.	TESTING DATE	COLOR	SUBSTRATE	COMPONENT	CONDITION	SIDE	BUILDING	ROOM	FLOOR	MISC	RESULTS	LEAD (mg/cm ²)
1	10/26/2011				SHUTTER CALIBRATION							2.64
2	10/26/2011				CALIBRATE						Positive	1.1
3	10/26/2011				CALIBRATE						Positive	1.1
4	10/26/2011				CALIBRATE						Positive	1.1
5	10/26/2011	GRAY	WOOD	WALL	INTACT	A	1		1	EXTERIOR	LCSC	0.15
6	10/26/2011	GRAY	WOOD	WALL	INTACT	A	1		1	EXTERIOR	LCSC	0.28
7	10/26/2011	GRAY	WOOD	WALL	INTACT	A	1		1	EXTERIOR	LCSC	0.22
8	10/26/2011	GRAY	WOOD	WALL	INTACT	A	1		1	EXTERIOR	Negative	0.02
9	10/26/2011	WHITE	WOOD	WINDOW FRAME	INTACT	A	1		1	EXTERIOR	LCSC	0.13
10	10/26/2011	WHITE	WOOD	WINDOW FRAME	INTACT	A	1		1	EXTERIOR	LCSC	0.16
11	10/26/2011	WHITE	WOOD	WINDOW FRAME	INTACT	B	1		1	EXTERIOR	LCSC	0.12
12	10/26/2011	WHITE	WOOD	WINDOW FRAME	INTACT	B	1		1	EXTERIOR	LCSC	0.26
13	10/26/2011	GRAY	WOOD	WALL	INTACT	B	1		1	EXTERIOR	Negative	0
14	10/26/2011	GRAY	WOOD	WALL	INTACT	B	1		1	EXTERIOR	Negative	0
15	10/26/2011	GRAY	METAL	WINDOW SECURITY BARS	INTACT	B	1		1	EXTERIOR	Null	0.05
16	10/26/2011	GRAY	METAL	WINDOW SECURITY BARS	INTACT	B	1		1	EXTERIOR	Negative	0.01
17	10/26/2011	GRAY	METAL	WINDOW SECURITY BARS	INTACT	B	1		1	EXTERIOR	Negative	0
18	10/26/2011	BLACK	METAL	WINDOW SECURITY BARS	INTACT	A	1		1	EXTERIOR	Negative	0.01
19	10/26/2011	BLACK	METAL	WINDOW SECURITY BARS	INTACT	A	1		1	EXTERIOR	Negative	0
20	10/26/2011	WHITE	WOOD	TRIM UPPER	INTACT	A	1		1	EXTERIOR	LCSC	0.12
21	10/26/2011	WHITE	WOOD	TRIM UPPER	INTACT	A	1		1	EXTERIOR	Null	0.15
22	10/26/2011	WHITE	WOOD	TRIM UPPER	INTACT	A	1		1	EXTERIOR	LCSC	0.14
23	10/26/2011	BROWN	WOOD	DOOR	INTACT	A	1		1	EXTERIOR	Negative	0
24	10/26/2011	BROWN	WOOD	DOOR	INTACT	A	1		1	EXTERIOR	Negative	0
25	10/26/2011	GRAY	WOOD	CEILING	INTACT	A	1		1	EXTERIOR	LCSC	0.11
26	10/26/2011	GRAY	WOOD	CEILING	INTACT	A	1		1	EXTERIOR	LCSC	0.14
27	10/26/2011	GRAY	METAL	CONDUIT	INTACT	A	1		1	EXTERIOR	Null	0
28	10/26/2011	GRAY	METAL	CONDUIT	INTACT	A	1		1	EXTERIOR	Negative	0
29	10/26/2011	GRAY	METAL	CONDUIT	INTACT	A	1		1	EXTERIOR	Negative	0
30	10/26/2011	WHITE	METAL	TRIM UPPER	INTACT	A	1		1	EXTERIOR	Negative	0.01
31	10/26/2011	WHITE	METAL	TRIM UPPER	INTACT	A	1		1	EXTERIOR	Null	0.29
32	10/26/2011	WHITE	METAL	TRIM UPPER	INTACT	A	1		1	EXTERIOR	Negative	0.06
33	10/26/2011	GRAY	METAL	RAIN GUTTER	INTACT	B	1		1	EXTERIOR	Negative	-0.22
34	10/26/2011	GRAY	METAL	RAIN GUTTER	INTACT	B	1		1	EXTERIOR	Negative	0
35	10/26/2011	BLUE	METAL	DOOR	INTACT	B	1		1	EXTERIOR	Negative	0.02
36	10/26/2011	BLUE	METAL	DOOR	INTACT	B	1		1	EXTERIOR	Negative	0.03
37	10/26/2011	BLUE	METAL	DOOR FRAME	INTACT	B	1		1	EXTERIOR	Negative	0
38	10/26/2011	BLUE	METAL	DOOR FRAME	INTACT	B	1		1	EXTERIOR	Negative	0
39	10/26/2011	BLUE	WOOD	CABINET	INTACT	B	1		1	EXTERIOR	Negative	0.01
40	10/26/2011	BLUE	WOOD	CABINET	INTACT	B	1		1	EXTERIOR	Negative	0
41	10/26/2011	BLUE	METAL	PIPE	INTACT	B	1		1	EXTERIOR	Negative	0
42	10/26/2011	BLUE	METAL	PIPE	INTACT	B	1		1	EXTERIOR	Negative	0
43	10/26/2011	GREEN	DRYWALL	WALL	INTACT	A	1	1	1	INTERIOR	Negative	0.02
44	10/26/2011	GREEN	DRYWALL	WALL	INTACT	A	1	1	1	INTERIOR	Negative	0.01
45	10/26/2011	WHITE	DRYWALL	WALL	INTACT	A	1	1	1	INTERIOR	Negative	0

14700 EAST NELSON AVENUE (FRONT), CITY OF INDUSTRY, CA												
READING NO.	TESTING DATE	COLOR	SUBSTRATE	COMPONENT	CONDITION	SIDE	BUILDING	ROOM	FLOOR	MISC	RESULTS	LEAD (mg/cm ²)
46	10/26/2011	BLUE	DRYWALL	WALL	INTACT	B	1	1	1	INTERIOR	Negative	0.02
47	10/26/2011	CLEAR	WOOD	CEILING	INTACT	B	1	1	1	INTERIOR	Negative	0
48	10/26/2011	CLEAR	WOOD	CEILING	INTACT	B	1	1	1	INTERIOR	Negative	0.03
49	10/26/2011	CLEAR	WOOD	DOOR	INTACT	A	1	1	1	INTERIOR	Negative	0
50	10/26/2011	CLEAR	WOOD	DOOR	INTACT	A	1	1	1	INTERIOR	Negative	0
51	10/26/2011	CLEAR	WOOD	DOOR FRAME	INTACT	A	1	1	1	INTERIOR	Negative	0
52	10/26/2011	CLEAR	WOOD	DOOR FRAME	INTACT	A	1	1	1	INTERIOR	Negative	0
53	10/26/2011	CLEAR	WOOD	WINDOW FRAME	INTACT	A	1	1	1	INTERIOR	Negative	0.01
54	10/26/2011	CLEAR	WOOD	WINDOW FRAME	INTACT	A	1	1	1	INTERIOR	Negative	0
55	10/26/2011	CLEAR	WOOD	WINDOW SILL	INTACT	A	1	1	1	INTERIOR	Negative	0
56	10/26/2011	CLEAR	WOOD	CABINET	INTACT	D	1	2	1	INTERIOR	Negative	0.01
57	10/26/2011	CLEAR	WOOD	CABINET	INTACT	D	1	2	1	INTERIOR	Negative	0
58	10/26/2011	CLEAR	WOOD	FLOOR	INTACT	D	1	2	1	INTERIOR	Negative	0
59	10/26/2011	CLEAR	WOOD	FLOOR	INTACT	D	1	2	1	INTERIOR	Negative	0
60	10/26/2011	BROWN	DRYWALL	WALL	INTACT	D	1	2	1	INTERIOR	Negative	0.06
61	10/26/2011	BROWN	DRYWALL	WALL	INTACT	D	1	2	1	INTERIOR	LCSC	0.25
62	10/26/2011	WHITE	CERAMIC	FLOOR	INTACT	D	1	1	1	INTERIOR	LBP	3.7
63	10/26/2011	WHITE	WOOD	WALL	INTACT	A	1	3	1	INTERIOR	Negative	0.07
64	10/26/2011	WHITE	WOOD	WALL	INTACT	A	1	3	1	INTERIOR	Negative	0.01
65	10/26/2011	WHITE	DRYWALL	WALL	INTACT	C	1	3	1	INTERIOR	Negative	0
66	10/26/2011	WHITE	DRYWALL	WALL	INTACT	C	1	3	1	INTERIOR	Negative	0
67	10/26/2011	TAN	METAL	CEILING T-GRID	INTACT	C	1	3	1	INTERIOR	Negative	0
68	10/26/2011	TAN	METAL	CEILING T-GRID	INTACT	C	1	3	1	INTERIOR	Negative	0
69	10/26/2011	WHITE	PLASTIC	CONDUIT	INTACT	B	1	3	1	INTERIOR	Negative	0
70	10/26/2011	WHITE	PLASTIC	CONDUIT	INTACT	B	1	3	1	INTERIOR	Negative	0
71	10/26/2011	CLEAR	WOOD	WALL	INTACT	B	1	5	1	INTERIOR	Negative	0.01
72	10/26/2011	CLEAR	WOOD	WALL	INTACT	B	1	5	1	INTERIOR	Negative	0
73	10/26/2011	GREEN	DRYWALL	WALL	INTACT	B	1	6	1	INTERIOR	Negative	0.08
74	10/26/2011	GREEN	DRYWALL	WALL	INTACT	B	1	6	1	INTERIOR	Negative	0.08
75	10/26/2011	BROWN	METAL	FLOOR DRAIN	INTACT	B	1	6	1	INTERIOR	LBP	19.4
76	10/26/2011	WHITE	PORCELAIN	URINAL	INTACT	C	1	7	1	INTERIOR	Negative	0.04
77	10/26/2011	WHITE	PORCELAIN	URINAL	INTACT	C	1	7	1	INTERIOR	Negative	0.03
78	10/26/2011	WHITE	PORCELAIN	SINK	INTACT	A	1	7	1	INTERIOR	Negative	0
79	10/26/2011	WHITE	PORCELAIN	SINK	INTACT	A	1	7	1	INTERIOR	Negative	0
80	10/26/2011	WHITE	PORCELAIN	TOILET	INTACT	A	1	7	1	INTERIOR	Negative	0.02
81	10/26/2011	TAN	CERAMIC	FLOOR	INTACT	O	1	7	1	INTERIOR	Negative	0.09
82	10/26/2011	TAN	CERAMIC	FLOOR	INTACT	O	1	7	1	INTERIOR	Negative	0.02
83	10/26/2011	GRAY	CERAMIC	WALL	INTACT	C	1	7	1	INTERIOR	Negative	0.01
84	10/26/2011	GRAY	CERAMIC	WALL	INTACT	C	1	7	1	INTERIOR	Negative	0.05
85	10/26/2011	WHITE	DRYWALL	WALL	INTACT	C	1	7	1	INTERIOR	Negative	0
86	10/26/2011	WHITE	DRYWALL	WALL	INTACT	C	1	7	1	INTERIOR	Negative	0
87	10/26/2011	WHITE	DRYWALL	CEILING	INTACT	C	1	7	1	INTERIOR	Negative	0
88	10/26/2011	WHITE	DRYWALL	CEILING	INTACT	C	1	7	1	INTERIOR	Negative	0
89	10/26/2011	WHITE	METAL	CONDUIT	INTACT	A	1	7	1	INTERIOR	Negative	0
90	10/26/2011	WHITE	METAL	CONDUIT	INTACT	A	1	7	1	INTERIOR	Negative	0

14700 EAST NELSON AVENUE (FRONT), CITY OF INDUSTRY, CA												
READING NO.	TESTING DATE	COLOR	SUBSTRATE	COMPONENT	CONDITION	SIDE	BUILDING	ROOM	FLOOR	MISC	RESULTS	LEAD (mg/cm ²)
91	10/26/2011	GRAY	METAL	WALL PANEL	INTACT	A	1	7	1	INTERIOR	Negative	0.08
92	10/26/2011	GRAY	METAL	WALL PANEL	INTACT	A	1	7	1	INTERIOR	Negative	0.02
93	10/26/2011	WHITE	WOOD	DOOR	INTACT	C	1	7	1	INTERIOR	LCSC	0.1
94	10/26/2011	WHITE	WOOD	DOOR	INTACT	C	1	7	1	INTERIOR	LCSC	0.12
95	10/26/2011	WHITE	WOOD	DOOR FRAME	INTACT	C	1	7	1	INTERIOR	Null	0.08
96	10/26/2011	WHITE	WOOD	DOOR FRAME	INTACT	C	1	7	1	INTERIOR	LCSC	0.13
97	10/26/2011	WHITE	WOOD	DOOR FRAME	INTACT	C	1	7	1	INTERIOR	LCSC	0.11
98	10/26/2011	TAN	PLASTIC	COUNTER	INTACT	D	1	8	1	INTERIOR	Negative	0
99	10/26/2011	TAN	PLASTIC	COUNTER	INTACT	D	1	8	1	INTERIOR	Negative	0
100	10/26/2011	GRAY	WOOD	CABINET	INTACT	D	1	8	1	INTERIOR	Negative	0
101	10/26/2011	GRAY	WOOD	CABINET	INTACT	D	1	8	1	INTERIOR	Negative	0
102	10/26/2011	BLUE	PLASTIC	COUNTER	INTACT	B	1	24	1	INTERIOR	Negative	0.01
103	10/26/2011	BLUE	PLASTIC	COUNTER	INTACT	B	1	24	1	INTERIOR	Negative	0.01
104	10/26/2011	BLUE	METAL	DOOR	INTACT	B	1	24	1	INTERIOR	Negative	0.02
105	10/26/2011	BLUE	METAL	DOOR	INTACT	B	1	24	1	INTERIOR	Negative	0.02
106	10/26/2011	BLUE	METAL	DOOR FRAME	INTACT	B	1	24	1	INTERIOR	Negative	0
107	10/26/2011	BLUE	METAL	DOOR FRAME	INTACT	B	1	24	1	INTERIOR	Negative	0
108	10/26/2011	BROWN	METAL	DOOR FRAME	INTACT	C	1	24	1	INTERIOR	Negative	0.04
109	10/26/2011	BROWN	METAL	DOOR FRAME	INTACT	C	1	24	1	INTERIOR	Negative	0.01
110	10/26/2011	BROWN	METAL	DOOR	INTACT	C	1	24	1	INTERIOR	Negative	0
111	10/26/2011	BROWN	METAL	DOOR	INTACT	C	1	24	1	INTERIOR	Negative	0
112	10/26/2011	WHITE	PLASTIC	COUNTER	INTACT	C	1	26	1	INTERIOR	Negative	0
113	10/26/2011	WHITE	PLASTIC	COUNTER	INTACT	C	1	26	1	INTERIOR	Negative	0
114	10/26/2011	BROWN	CERAMIC	FLOOR	INTACT	0	1	25	1	INTERIOR	Negative	0
115	10/26/2011	BROWN	CERAMIC	FLOOR	INTACT	0	1	25	1	INTERIOR	Negative	0
116	10/26/2011	BLUE	WOOD	WALL	INTACT	A	1	1s	1	INTERIOR	Negative	0
117	10/26/2011	BLUE	WOOD	WALL	INTACT	A	1	1s	1	INTERIOR	Negative	0
118	10/26/2011	ORANGE	WOOD	truss	INTACT	C	1	1s	1	INTERIOR	Negative	0
119	10/26/2011	ORANGE	WOOD	truss	INTACT	C	1	1s	1	INTERIOR	Negative	0
120	10/26/2011	GRAY	WOOD	CEILING	INTACT	0	1	1s	1	INTERIOR	Null	0
121	10/26/2011	GRAY	WOOD	CEILING	INTACT	0	1	1s	1	INTERIOR	Negative	0
122	10/26/2011	GRAY	WOOD	CEILING	INTACT	0	1	1s	1	INTERIOR	Negative	0.03
123	10/26/2011	GRAY	CERAMIC	FLOOR	INTACT	D	1	12	1	INTERIOR	Negative	0.04
124	10/26/2011	GRAY	CERAMIC	FLOOR	INTACT	D	1	12	1	INTERIOR	Negative	0.01
125	10/26/2011	WHITE	CERAMIC	WALL	INTACT	C	1	12	1	INTERIOR	Null	0
126	10/26/2011	WHITE	CERAMIC	WALL	INTACT	C	1	12	1	INTERIOR	Negative	0.04
127	10/26/2011	WHITE	WOOD	BASEBOARD	INTACT	C	1	12	1	INTERIOR	Negative	0
128	10/26/2011	BLUE	WOOD	WALL	INTACT	A	2		1	EXTERIOR	Negative	0
129	10/26/2011	BLUE	WOOD	WALL	INTACT	A	2		1	EXTERIOR	Negative	0
130	10/26/2011	BLUE	WOOD	WALL	INTACT	A	2		1	EXTERIOR	Negative	0.02
131	10/26/2011	GRAY	WOOD	TRIM	INTACT	A	2		1	EXTERIOR	Negative	0
132	10/26/2011	GRAY	WOOD	TRIM	INTACT	A	2		1	EXTERIOR	Negative	0
133	10/26/2011	GRAY	WOOD	TRIM	INTACT	A	2		1	EXTERIOR	Negative	0
134	10/26/2011	RED	METAL	CABINET	INTACT	A	2		1	EXTERIOR	Negative	0
135	10/26/2011	RED	METAL	CABINET	INTACT	A	2		1	EXTERIOR	Negative	0

14700 EAST NELSON AVENUE (FRONT), CITY OF INDUSTRY, CA												
READING NO.	TESTING DATE	COLOR	SUBSTRATE	COMPONENT	CONDITION	SIDE	BUILDING	ROOM	FLOOR	MISC	RESULTS	LEAD (mg/cm ²)
136	10/26/2011	WHITE	METAL	PIPE	INTACT	A	2		1	EXTERIOR	Null	0.01
137	10/26/2011	WHITE	METAL	PIPE	INTACT	A	2		1	EXTERIOR	Negative	0.05
138	10/26/2011	WHITE	METAL	PIPE	INTACT	A	2		1	EXTERIOR	Negative	0.06
139	10/26/2011	WHITE	WOOD	WALL	FAIR	C	2		1	EXTERIOR	Negative	0.02
140	10/26/2011	WHITE	WOOD	WALL	FAIR	C	2		1	EXTERIOR	Negative	0.02
141	10/26/2011	WHITE	WOOD	POLE	FAIR	C	2		1	EXTERIOR	Negative	0.03
142	10/26/2011	WHITE	WOOD	POLE	FAIR	C	2		1	EXTERIOR	Negative	0.02
143	10/26/2011	clear	WOOD	POLE	INTACT	C	2		1	EXTERIOR	Negative	0
144	10/26/2011	clear	WOOD	POLE	INTACT	C	2		1	EXTERIOR	Negative	0
145	10/26/2011				SHUTTER CALIBRATION							2.74
146	10/26/2011				CALIBRATE						Positive	1.1
147	10/26/2011				CALIBRATE						Positive	1.2
148	10/26/2011				CALIBRATE						Positive	1
149	10/26/2011	GRAY	METAL	RAIN GUTTER	INTACT	D	2		1	EXTERIOR	Negative	0
150	10/26/2011	GRAY	METAL	RAIN GUTTER	INTACT	D	2		1	EXTERIOR	Negative	0
151	10/26/2011	WHITE	METAL	RAIN GUTTER	INTACT	C	2		1	EXTERIOR	Negative	0
152	10/26/2011	WHITE	WOOD	WALL	INTACT	C	3		1	EXTERIOR	Negative	0
153	10/26/2011	WHITE	WOOD	WALL	INTACT	C	3		1	EXTERIOR	Negative	0
154	10/26/2011	GRAY	WOOD	TRIM	INTACT	D	3		1	EXTERIOR	Negative	0
155	10/26/2011	GRAY	WOOD	TRIM	INTACT	D	3		1	EXTERIOR	Negative	0
156	10/26/2011	clear	WOOD	POLE	INTACT	D	3		1	EXTERIOR	Negative	0
157	10/26/2011	clear	WOOD	POLE	INTACT	D	3		1	EXTERIOR	Negative	0.01
158	10/26/2011	GRAY	METAL	RAIN GUTTER	INTACT	A	3		1	EXTERIOR	Negative	0.02
159	10/26/2011	GRAY	METAL	RAIN GUTTER	INTACT	A	3		1	EXTERIOR	Negative	0
160	10/26/2011	BLUE	WOOD	WALL	INTACT	A	3		1	EXTERIOR	Negative	0
161	10/26/2011	BLUE	WOOD	WALL	INTACT	A	3		1	EXTERIOR	Negative	0
162	10/26/2011	RED	METAL	CABINET	INTACT	A	3		1	EXTERIOR	LBP	0.9
163	10/26/2011	RED	METAL	CABINET	INTACT	A	3		1	EXTERIOR	LCSC	0.6
164	10/26/2011	RED	METAL	PIPE	INTACT	A	3		1	EXTERIOR	LBP	0.8
165	10/26/2011	RED	METAL	PIPE	INTACT	A	3		1	EXTERIOR	LBP	1.1
166	10/26/2011	GRAY	WOOD	WALL	INTACT	C	4		1	EXTERIOR	Negative	0
167	10/26/2011	GRAY	WOOD	WALL	INTACT	C	4		1	EXTERIOR	Negative	0
168	10/26/2011	GRAY	METAL	WALL	INTACT	C	4		1	EXTERIOR	LBP	2.1
169	10/26/2011	GRAY	WOOD	CEILING	INTACT	D	4		1	EXTERIOR	Negative	0
170	10/26/2011	GRAY	WOOD	CEILING	INTACT	D	4		1	EXTERIOR	Negative	0
171	10/26/2011	RED	METAL	WALL	INTACT	D	4		1	INTERIOR	LCSC	0.6
172	10/26/2011	RED	METAL	WALL	INTACT	B	4		1	INTERIOR	LBP	0.8
173	10/26/2011	RED	METAL	WALL	INTACT	O	4		1	INTERIOR	LCSC	0.4
174	10/26/2011	RED	METAL	WALL	INTACT	B	4		1	INTERIOR	LCSC	0.5
175	10/26/2011	RED	METAL	CEILING	INTACT	O	4		1	INTERIOR	Null	1.3
176	10/26/2011	RED	METAL	CEILING	INTACT	O	4		1	INTERIOR	LBP	1.2
177	10/26/2011	WHITE	WOOD	WALL	INTACT	B	1	ls	1	EXTERIOR	Negative	0
178	10/26/2011	WHITE	WOOD	WALL	INTACT	B	1	ls	1	EXTERIOR	Negative	0.02
179	10/26/2011	GRAY	WOOD	TRIM	FAIR	B	1	ls	1	EXTERIOR	Negative	0
180	10/26/2011	GRAY	WOOD	TRIM	FAIR	B	1	ls	1	EXTERIOR	Negative	0

14700 EAST NELSON AVENUE (FRONT), CITY OF INDUSTRY, CA												
READING NO.	TESTING DATE	COLOR	SUBSTRATE	COMPONENT	CONDITION	SIDE	BUILDING	ROOM	FLOOR	MISC	RESULTS	LEAD (mg/cm ²)
181	10/26/2011	WHITE	asphalt	FLOOR STRIPE	FAIR	0	1	ls	1	EXTERIOR	Negative	0
182	10/26/2011	WHITE	asphalt	FLOOR STRIPE	FAIR	0	1	ls	1	EXTERIOR	Negative	0
183	10/26/2011	YELLOW	asphalt	FLOOR STRIPE	FAIR	0	1	ls	1	EXTERIOR	LBP	2
184	10/26/2011	BLUE	asphalt	FLOOR STRIPE	FAIR	0	1	ls	1	EXTERIOR	Negative	0
185	10/26/2011	BLUE	asphalt	FLOOR STRIPE	FAIR	0	1	ls	1	EXTERIOR	Negative	0
186	10/26/2011	YELLOW	asphalt	FLOOR STRIPE	FAIR	0	1	ls	1	INTERIOR	Negative	0.03
187	10/26/2011	YELLOW	asphalt	FLOOR STRIPE	FAIR	0	1	ls	1	INTERIOR	Negative	0
188	10/26/2011	WHITE	asphalt	FLOOR STRIPE	FAIR	0	1	ls	1	INTERIOR	Negative	0.03
189	10/26/2011	WHITE	asphalt	FLOOR STRIPE	FAIR	0	1	ls	1	INTERIOR	Negative	0.01
190	10/26/2011	WHITE	WOOD	WALL	INTACT	B	5		1	EXTERIOR	Negative	0.03
191	10/26/2011	WHITE	WOOD	WALL	INTACT	B	5		1	EXTERIOR	Negative	0
192	10/26/2011	GRAY	WOOD	TRIM	INTACT	B	5		1	EXTERIOR	Negative	0
193	10/26/2011	GRAY	WOOD	TRIM	INTACT	B	5		1	EXTERIOR	Negative	0
194	10/26/2011	RED	METAL	CABINET	INTACT	B	5		1	EXTERIOR	LBP	1.7
195	10/26/2011	RED	METAL	PIPE	INTACT	B	5		1	EXTERIOR	LCSC	0.5
196	10/26/2011	RED	METAL	PIPE	INTACT	B	5		1	EXTERIOR	LCSC	0.11
197	10/26/2011	WHITE	WOOD	WALL	POOR	D	5		1	EXTERIOR	Negative	0
198	10/26/2011	WHITE	WOOD	WALL	POOR	D	5		1	EXTERIOR	Negative	0.01
199	10/26/2011	clear	WOOD	POLE	FAIR	C	5		1	EXTERIOR	Negative	0
200	10/26/2011	clear	WOOD	POLE	FAIR	C	5		1	EXTERIOR	Negative	0
201	10/26/2011	GRAY	METAL	RAIN GUTTER	INTACT	D	5		1	EXTERIOR	Negative	0.01
202	10/26/2011	GRAY	METAL	RAIN GUTTER	INTACT	D	5		1	EXTERIOR	Negative	0.01
203	10/26/2011	YELLOW	asphalt	speed bump	POOR	0	5		1	EXTERIOR	Null	0.14
204	10/26/2011	YELLOW	asphalt	speed bump	POOR	0	5		1	EXTERIOR	Negative	0
205	10/26/2011	WHITE	WOOD	WALL	INTACT	D	6		1	INTERIOR	Negative	0
206	10/26/2011	WHITE	WOOD	WALL	INTACT	D	6		1	INTERIOR	Negative	0
207	10/26/2011	WHITE	WOOD	POLE	FAIR	D	6		1	INTERIOR	Negative	0
208	10/26/2011	WHITE	WOOD	POLE	FAIR	D	6		1	INTERIOR	Negative	0
209	10/26/2011	WHITE	DRYWALL	WALL	FAIR	B	6		1	INTERIOR	Negative	0.01
210	10/26/2011	WHITE	DRYWALL	WALL	FAIR	B	6		1	INTERIOR	Negative	0
211	10/26/2011	WHITE	WOOD	WALL	INTACT	D	6		1	EXTERIOR	Negative	0
212	10/26/2011	WHITE	WOOD	WALL	INTACT	D	6		1	EXTERIOR	Negative	0
213	10/26/2011	GRAY	WOOD	TRIM	INTACT	D	6		1	EXTERIOR	Negative	0
214	10/26/2011	GRAY	WOOD	TRIM	INTACT	D	6		1	EXTERIOR	Null	0.08
215	10/26/2011	GRAY	WOOD	TRIM	INTACT	D	6		1	EXTERIOR	Negative	0
216	10/26/2011	GRAY	METAL	RAIN GUTTER	INTACT	D	6		1	EXTERIOR	Negative	0
217	10/26/2011	GRAY	METAL	RAIN GUTTER	INTACT	D	6		1	EXTERIOR	Negative	0
218	10/26/2011	WHITE	METAL	CONDUIT	INTACT	D	6		1	EXTERIOR	LCSC	0.19
219	10/26/2011	WHITE	METAL	CONDUIT	INTACT	D	6		1	EXTERIOR	Negative	0.01
220	10/26/2011	YELLOW	METAL	POLE	INTACT	A	6		1	EXTERIOR	Negative	0
221	10/26/2011	YELLOW	METAL	POLE	INTACT	A	6		1	EXTERIOR	Negative	0
222	10/26/2011	YELLOW	METAL	POLE small	INTACT	D	6		1	EXTERIOR	LCSC	0.5
223	10/26/2011	YELLOW	METAL	POLE small	INTACT	D	6		1	EXTERIOR	LCSC	0.4
224	10/26/2011	YELLOW	METAL	fire hydrant	INTACT	D	6		1	EXTERIOR	LBP	4
225	10/26/2011	BLUE	WOOD	POLE	INTACT	C	6		1	EXTERIOR	Negative	0

14700 EAST NELSON AVENUE (FRONT), CITY OF INDUSTRY, CA												
READING NO.	TESTING DATE	COLOR	SUBSTRATE	COMPONENT	CONDITION	SIDE	BUILDING	ROOM	FLOOR	MISC	RESULTS	LEAD (mg/cm ²)
226	10/26/2011	BLUE	WOOD	POLE	INTACT	C	6		1	EXTERIOR	Negative	0
227	10/26/2011	clear	WOOD	POLE	INTACT	C	6		1	EXTERIOR	Negative	0
228	10/26/2011	clear	WOOD	POLE	INTACT	C	6		1	EXTERIOR	Negative	0
229	10/26/2011	WHITE	WOOD	WALL	INTACT	B	7		1	EXTERIOR	Negative	0
230	10/26/2011	GRAY	WOOD	TRIM	INTACT	A	7		1	EXTERIOR	Negative	0.01
231	10/26/2011	WHITE	METAL	RAIN GUTTER	INTACT	D	7		1	EXTERIOR	Negative	0
232	10/26/2011	RED	METAL	CABINET	INTACT	D	7		1	EXTERIOR	Negative	0.01
233	10/26/2011	clear	WOOD	POLE	INTACT	B	7		1	INTERIOR	Negative	0
234	10/26/2011	clear	WOOD	POLE	INTACT	B	7		1	INTERIOR	Null	0
235	10/26/2011	clear	WOOD	POLE	INTACT	B	7		1	INTERIOR	Negative	0
236	10/26/2011	WHITE	WOOD	WALL	POOR	D	7		1	EXTERIOR	Negative	0
237	10/26/2011	WHITE	WOOD	WALL	INTACT	D	8		1	EXTERIOR	Negative	0
238	10/26/2011	GRAY	WOOD	TRIM	INTACT	D	8		1	EXTERIOR	Negative	0
239	10/26/2011	clear	WOOD	POLE	FAIR	D	8		1	EXTERIOR	Negative	0.01
240	10/26/2011	WHITE	METAL	RAIN GUTTER	INTACT	B	8		1	EXTERIOR	Negative	0
241	10/26/2011	RED	METAL	CABINET	INTACT	B	8		1	EXTERIOR	LBP	0.8
242	10/26/2011	WHITE	METAL	PIPE	INTACT	B	8		1	EXTERIOR	LCSC	0.15
243	10/26/2011										Positive	1.1
244	10/26/2011										Positive	1.2
245	10/26/2011										Positive	1.2

Notes:
 XRF - X-ray fluorescence spectrum analyzer INT - Interior Null - Incomplete reading
 mg/cm² - 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/cm²
 LBP - Lead-Based Paint (Los Angeles County), lead is present at 0.70 mg/cm² or greater
 LBS - Lead-Bearing Substance, lead is present at 0.70 mg/cm² or greater

APPENDIX D

CDPH LEAD HAZARD EVALUATION REPORT

LEAD HAZARD EVALUATION REPORT

Section 1 – Date of Lead Hazard Evaluation 10/26 / 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)] <u>"Front" 14700 Nelson Ave.</u>		City <u>City of Industry</u>	County <u>CA</u>	Zip Code
Construction date (year) of structure <u>unknown @ this time</u>	Type of structure <input checked="" type="checkbox"/> Multi-unit building <input type="checkbox"/> School or daycare <input type="checkbox"/> Single family dwelling <input type="checkbox"/> Other _____		Children living in structure? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Don't Know	

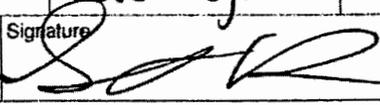
Section 4 – Owner of Structure (if business/agency, list contact person)

Name <u>City of Industry C/O Craig Metheny</u>		Telephone number <u>961-736-5334</u>		
Address [number, street, apartment (if applicable)] <u>1141 Pomona rd. Ste "E"</u>		City <u>Corona</u>	State <u>CA</u>	Zip Code <u>92882</u>

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 <u>Steve Pitts/Winter + Kelly</u>		Telephone number <u>858 244 0440</u>		
Address [number, street, apartment (if applicable)] <u>3750 Convey St. #220</u>		City <u>San Diego</u>	State <u>CA</u>	Zip Code <u>92111</u>
CDPH certification number <u>#15644</u>	Signature 		Date <u>10/27/11</u>	

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 specific 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