



**HAZARDOUS MATERIALS REMOVAL WORK PLAN
BUILDING DEMOLITION
333 TURNBULL CANYON ROAD
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

September 8, 2011
Project No. 100252002

ARDENT

ENVIRONMENTAL
GROUP, INC.

September 8, 2011
Project No. 100252002

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
333 Turnbull Canyon Road
City of Industry, California

2011 SEP -9 AM 11:05
CITY OF INDUSTRY

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 building located at 333 Turnbull Canyon Road, 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 building and facilities located at 333 Turnbull Canyon Road, 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, 333 Turnbull Canyon Road, City of Industry, California: unpublished report dated September 1.

Ardent Environmental Group, Inc. 2011b, Miscellaneous Hazardous Building Material Survey, 333 Turnbull Canyon Road, City of Industry, California: unpublished report dated September 1.

Winzler & Kelly, 2011, Pre-Demolition Lead Testing Services Report, Warehouse/Office Building, 333 Turnbull Canyon Road, City of Industry, California: unpublished report dated July 26.

1.1. Project Location and Description

The site is located at 333 Turnbull Canyon Road in the City of Industry, Los Angeles County, California (Figure 1). The site is located on the western corner of the intersection of Proctor Avenue and Turnbull Canyon Road and contains one commercial building. The site has been assigned the Tax Assessor's Parcel Number (APN) 8208-014-034.

The site consists of a rectangular shaped property comprising approximately 6.5 acres. The site contains one approximately 131,000 square foot industrial building that is currently va-

cant. The building contains approximately 32,000 square feet of office space. The original portion of the building was constructed in 1963 in the southern portion of the site. Additions were added in phases with the majority being added in mid-1970s and an office addition in the northeastern corner of the building in the mid-1980s. The site building is of concrete tilt-up construction with wood and/or metal framed gypsum board interior walls. Floors are finished with carpet, sheet linoleum, vinyl floor tiles, and ceramic tiles. Ceilings 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, and 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 (TTLC), Soluble Threshold Limit Concentration (STLC), and/or Toxicity Characteristic Leaching Potential (TCLP) tests prior to disposal. STLC or TCLP results indicating 5 parts per million or more shall be disposed of as RCRA regulated hazardous waste.
- G. Copies of testing results shall be provided to the Owner's Representative.
- H. Each drum shall be labeled to identify the type of waste in accordance with 49 CFR 172 and the date wastes were first put into the drum.
- I. The Contractor shall make provisions for the safe storage of waste on-site for waste characterization and eventual disposal. Waste storage areas must be treated as lead control areas with restricted access.
- J. The Contractor will be responsible for obtaining and completing all relevant permits, licenses, manifests, etc. for hazardous waste disposal on behalf of the Owner. Manifests and other forms requiring signature by the generator will be signed by the Owner's Representative.
- K. Waste shipment records, hazardous waste manifests, and disposal receipts signed and dated by an agent of the landfill or receiving facility, certifying the amount of waste materials shall be delivered to the Owner's Representative within three working days after delivery to the disposal facility.

3.12. Alternative Procedures

- A. If procedures presented in this Work Plan cannot be utilized, the Contractor shall provide the Owner's Representative a written request describing recommended alternatives for approval.
- B. Proposed alternative procedures shall be equal to or in excess of procedures they are replacing.

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

3.13. Environmental Monitoring

The Owner and/or Owner's Representative 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, volatile organic compound (VOC) contaminated soil is known to be present in the southwestern portion of the site. The extent of impacted soil was assessed to extend beneath the southwestern portion of the building and into the adjacent paved areas, with a lateral extent of approximately 75 feet in diameter. On December 2, 2010, a deed restriction was recorded with the County of Los Angeles restricting the land use to commercial purposes and restricting excavation, grading, and development activities in the area of the impacted soil. In accordance with the requirements of the deed restriction, a notification will be prepared and submitted by the Owner's Representative to the Regional Water Quality Control Board (RWQCB) prior to demolition activities. The area of contaminated soil will be demarcated by the Owner's Representative. The Contractor shall not excavate or unnecessarily disturb the contaminated soil unless directed to do so by the Owner's Representative.

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. MISCELANIOUS WASTES/MATERIALS

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

Table 1 – Asbestos-Containing Materials (ACMs_ (greater than 1% asbestos content)

Description	Location		Quantity	Condition
	Building	Rooms		
Black Mirror Mastic	D	2, 3, 20 & 21	20 SF	Good/Non-Friable
Black Mirror Mastic	B	16	20 SF	Good/Non-Friable
Tan & Brown Flooring and Black Mastic	A	28 (northwest portion)	880 SF	Good/Non-Friable
Drywall & Joint Compound	A	5 & 6	1,340 SF	Good/Friable
Black Mirror Mastic	A	23, 25 & 26	15 SF	Good/Non-Friable
Black Flooring Mastic (under sheet flooring backing)	A	29	420 SF	Good/Non-Friable
Black Mastic (under sheet flooring backing)	A	5 & 6	860 SF	Good/Non-Friable
Tan 12"x12" Floor Tiles and Black Mastic (under gray sheet flooring)	A	17 & 18	420 SF	Good/Non-Friable
Gray Penetration Mastic	A	Parapet Walls & AC Units	300 SF	Good/non Friable
Black Penetration Mastic with Silver Paint	A	AC Units	20 SF	Good/Non-Friable
Black Penetration Mastic with Pebble Texture	A	AC Units	30 SF	Good/Non-Friable
Gray Mastic	A/B	Flashing on top of Parapet Walls	30 SF	Good/Non-Friable
Gray Penetration Mastic	A	Parapet Wall Sides	100 SF	Good/Non-Friable
Gray Penetration Mastic	B	AC Units and Vent Ducting	50 SF	Good/Non-Friable
Dark Gray Mastic	B	Flashing on Parapet Wall between A & B	10 SF	Good/Non-Friable

SF = square feet
 Building and room number locations are shown in Figures 2 & 3 of the Asbestos Survey Report (Appendix A)

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

Description	Location	Quantity	Condition
None			

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

Feature (color/substrate/component)	Location	Quantity	Condition
Black & White/Metal/Pipe Covering	Roof – Building A	16 Each	Intact
Silver/Metal/Conduit	Roof – Building B	100 LF	Intact
White & Brown/Stucco/Walls & Overhang Ceilings	Exterior	16,000 SF	Fair to Intact
Red/Metal/Bollard	Exterior	8 Each	Intact
Red/Metal/Fire Hydrant	Exterior	5 Each	Intact
Yellow/Metal/Safety Hand Rail	Warehouse – Building C	20 LF	Fair
Yellow/Metal/I-Beam Column	Warehouse – Building A	36 Each (1,080 LF)	Intact
Red/Wood/Fire Ext. Frame	Mezzanine – Building A	10 SF	Intact

Locations are shown in Figure 1 included with 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	Warehouses	836
Fluorescent Light Tubes	Mercury	Throughout Building	1,990 – 4 ft long 1,180 – U-Shape 50 – 2 ft long
Air Conditioning Units	Freon or CFC gases	Roof	34
Water Coolers	Freon or CFC gases	Interior	3
Exit Signs and Thermostats	Batteries	Throughout Building	24
PCB – polychlorinated biphenyls CFC – Chlorofluorocarbons			

APPENDIX A

HAZARDOUS BUILDING MATERIAL SURVEY REPORTS



**ASBESTOS SURVEY
333 TURNBULL CANYON ROAD
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

September 2, 2011
Project No. 100252002

ARDENT
ENVIRONMENTAL
GROUP, INC.

September 2, 2011
Project No. 100252002

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

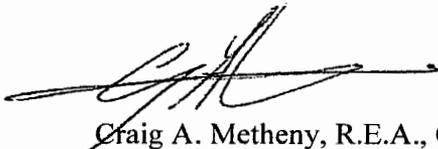
Subject: Asbestos Survey
333 Turnbull Canyon Road
City of Industry, California

Dear Mr. Radecki:

In accordance with your authorization, Ardent Environmental Group, Inc. has completed a pre-demolition asbestos survey of the building located at 333 Turnbull Canyon Road, 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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Figure 2 – Sample Location Map

Figure 3 – Roof and Exterior Sample Location Map

Appendices

Appendix A – Laboratory Reports

Appendix B – Certifications

1. INTRODUCTION

Ardent Environmental Group, Inc. (Ardent) performed a pre-demolition asbestos survey of the building located at 333 Turnbull Canyon Road, 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 10-13.

2. PURPOSE

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

3. BUILDING LOCATION AND DESCRIPTION

The site is located at 333 Turnbull Canyon Road in the City of Industry, Los Angeles County, California (Figure 1). The site is located on the western corner of the intersection of Proctor Avenue and Turnbull Canyon Road and contains one commercial building. The site has been assigned the Tax Assessor's Parcel Number (APN) 8208-014-034.

The site consists of a rectangular shaped property comprising approximately 6.5 acres. The site contains one approximately 131,000 square foot industrial building that is currently vacant. The building contains approximately 32,000 square feet of office space. The original portion of the building was constructed in 1963 in the southern portion of the site. Additions were added in phases with the majority being added in mid-1970s and an office addition in the northeastern corner of the building in the mid-1980s. The site building is of concrete tilt-up construction with wood and/or metal framed gypsum board interior walls. Floors are finished with carpet, sheet linoleum, vinyl floor tiles, and ceramic tiles. Ceilings 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 195 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 July 14, 2011 and August 5, 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 195 bulk samples were collected from the site buildings. Bulk sample descriptions are summarized in Table 2 and locations are shown in Figures 2 and 3.

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. Thirteen 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 195 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		
F	Black Mirror Mastic	D	2, 3, 20 & 21	20 sf	Good/Non-Friable
R	Black Mirror Mastic	B	16	20 sf	Good/Non-Friable
BB	Tan & Brown Flooring and Black Mastic	A	28 (northwest portion)	880 sf	Good/Non-Friable
FF	Drywall & Joint Compound	A	5 & 6	1,340 sf	Good/Friable
MM	Black Mirror Mastic	A	23, 25 & 26	15 sf	Good/Non-Friable
TT	Black Flooring Mastic (under sheet flooring backing)	A	29	420 sf	Good/Non-Friable
UU	Black Mastic (under sheet flooring backing)	A	5&6	860 sf	Good/Non-Friable
XX	Tan 12"x12" Floor Tiles and Black Mastic (under gray sheet flooring)	A	17 & 18	420 sf	Good/Non-Friable
AAA	Gray Penetration Mastic	A	Parapet Walls & AC Units	300 sf	Good/non Friable
DDD	Black Penetration Mastic with Silver Paint	A	AC Units	20 sf	Good/Non-Friable
EEE	Black Penetration Mastic with Pebble Texture	A	AC Units	30 sf	Good/Non-Friable
JJJ	Gray Mastic	A/B	Flashing on top of Parapet Walls	30 sf	Good/Non-Friable
OOO	Gray Penetration Mastic	A	Parapet Wall Sides	100 sf	Good/Non-Friable
QQQ	Gray Penetration Mastic	B	AC Units and Vent Ducting	50 sf	Good/Non-Friable
TTT	Dark Gray Mastic	B	Flashing on Parapet Wall between A & B	10 sf	Good/Non-Friable

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

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

HA	Description	Location	Quantity	Condition
	None			

HA = Homogeneous Area (see Table 1)

8. RECOMMENDATIONS

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

At no time should the identified ACMs 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	D	All rooms
B	White Cove Base Mastic	D	All rooms
C	Yellow Carpet Mastic	D	All rooms
D	2'x2' Suspended Ceiling Tile - Random Pattern	D	All rooms
E	2'x2' Suspended Ceiling Tile - Rough	D	Random Locations
F	Black Mirror Mastic	D	Rooms 2, 3, 20 & 21
G	Drywall and Joint Compound with Texture Coat	B	All offices (rooms 1-17, 19 & 20)
H	White Mastic - Behind Gray Cove Base	B	All offices (rooms 1-17, 19 & 20)
I	Yellow Carpet Mastic - Under Dark Gray Carpet	B	Selected offices
J	White Carpet Glue - Under Light Gray Carpet	B	Selected offices
K	2'x2' Suspended Ceiling Tile - Random Pattern	B	All offices (rooms 1-17, 19 & 20)
L	Gray 12"x12" Floor Tile	B	Room 7
M	Vinyl Covered Drywall (no joint compound)	B	Room 7
N	Drywall and Joint Compound with Texture Coat	B	Room 7
O	Drywall and Joint Compound	B	Rooms 8, 16 & 17
P	White Mastic - Behind Black Cove Base	B	Rooms 16 & 17
Q	Particle Board	B	Room 18 (back of rooms 6, 7 & 8)
R	Black Mirror Mastic	B	Room 16
S	Brown Mastic Behind Particle Board	B	Room 18 (back of rooms 6, 7 & 8)
T	Beige Flooring with Carpet Glue on Top	B	Room 1
U	2'x4' Suspended Ceiling Tile - Medium Dot Pattern	B	Room 7
V	Yellow Carpet Mastic	A	Rooms 8-16, 30, 31 & 42
W	Beige Mastic - Behind Black Cove Base	A	Rooms 8-16, 30, 32-37 & 42
X	2'x2' Suspended Ceiling Tile - Rough	A & B	Rooms 8-16, 30, 32-37 & 42 - Building A Room 1 - Building B
Y	Drywall and Joint Compound with Texture Coat	A	Rooms 7-20, 28-30, 32-37 & 42
Z	Floor Leveling Compound with Yellow Carpet Glue	A	All offices except rooms 4, 5, 6, 28 & 29
AA	Drywall and Joint Compound	A	Rooms 12, 25 & 26

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

HA #	Description	Building	Location(s)
BB	Tan & Brown Sheet Flooring and Black or Brown Mastic	A	Room 28
CC	White Mastic - Behind Brown Cove Base	A	Rooms 7, 19, 46 & 47
DD	White Mastic - Behind Gray Cove Base	A	Rooms 4, 5, 6, 17 & 18
EE	Gray Floor Leveling Compound	A	Room 4
FF	Drywall and Joint Compound	A	Rooms 5 & 6
GG	Vinyl Covered Drywall (no joint compound)	A	Rooms 1-4
HH	Drywall and Joint Compound	A	Rooms 21, 22, 23 & 27, including back side of offices in room 45
II	Drywall and Joint Compound over Brown Mastic	A	Room 45 (back of rooms 17 & 18)
JJ	Gray 12"x12" Floor Tile with Brown Mastic	A	Rooms 32-37
KK	Drywall and Joint Compound	A	Rooms 32-37
LL	White Mastic - Behind Black Cove Base	A	Rooms 32-37
MMA	Brown Mirror Mastic	A	Rooms 25 & 26
MMb	Black Mirror Mastic	A	Rooms 23, 25 & 26
NN	Drywall and Joint Compound	A	Rooms 43 & 44
OO	2'x4' Suspended Ceiling Tile	A	Room 44
PP	White Mastic - Behind Black Cove Base	A	Rooms 43 & 44
QQ	Gray 12"x12" Floor Tile with Yellow Mastic	B	Room 8
RR	Drywall and Joint Compound	B	Room 18 (back of rooms 2 & 8)
SS	Gray Sheet Flooring with White Mastic	A	Rooms 17 & 18
TT	Sheet Flooring Backing and Leveling Compound with Black Mastic	A	Room 29
UU	Sheet Flooring Backing with Black Mastic	A	Rooms 5 & 6
VV	Joint Compound over Brown Mastic and Plywood	A	Room 45 (back of room 20)
WW	Joint Compound over Plywood	A	Room 45 (back of room 20)
XX	Tan 12"x12" Floor Tile with Black Mastic	A	Rooms 17 & 18 (under gray sheet flooring)
YY	Gray Mastic Under Sink	A	Room 24
ZZ	Roof Core	A	Roof
AAA	Gray Penetration Mastic	A	Parapet Walls and AC Units

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

HA #	Description	Building	Location(s)
BBB	Black Penetration Mastic with White Paint	A	Vents
CCC	Dark Gray Penetration Mastic	A	Various Penetrations
DDD	Black Penetration Mastic with Silver Paint	A	AC Units
EEE	Black Penetration Mastic with Pebble Texture	A	AC Units
FFF	White Cove with Felt	A	Parapet Walls, Skylights, and AC Units
GGG	Roof Core	B	Roof
HHH	Black Penetration Mastic	B	Skylights and AC Units
III	Gray Penetration Mastic	B	Vents
JJJ	Gray Mastic	A & B	Flashing on Top of Parapet Wall
KKK	Roof Core	C	Roof
LLL	White Parapet Wall Siding	C	Parapet Walls
MMM	White Mastic	C	Flashing on Top of Parapet Wall
NNN	Black Penetration Mastic with Pebble Texture	C	Skylights and Vents
OOO	Gray Penetration Mastic	A	Parapet Wall Sides
PPP	Roof Walking Pads	A	Roof
QQQ	Gray Penetration Mastic	B	AC Units and Vents
RRR	Roof Core with Silver Paint	D	Roof
SSS	Black Penetration Mastic with Silver Paint	D	Vents and Other Penetrations
TTT	Dark Gray Mastic	B	Flashing on Parapet Wall Between Sections B & D
UUU	Textured Stucco	D	All of exterior, including parapet wall
VVV	Light Gray Mastic	B	Flashing on Parapet Wall Between Sections B & D
WWW	Black Window Sealant	A & B	Front Windows
XXX	Textured Stucco	A & B	Front of Buildings

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

TABLE 2 - ASBESTOS SAMPLE RESULTS

Sample Number	HA Number	Type of Material	Location		Asbestos Content
			Building	Room	
1	A	Drywall & Joint Compound	D	Room 7	Joint Compound = ND Drywall = ND
2	A	Drywall & Joint Compound	D	Room 17	Joint Compound = ND Drywall = ND
3	A	Drywall & Joint Compound	D	Room 32	Joint Compound = ND Drywall = ND
4	B	White Mastic Behind Black Cove Base	D	Room 12	ND
5	B	White Mastic Behind Black Cove Base	D	Room 17	ND
6	B	White Mastic Behind Black Cove Base	D	Room 26	ND
7	C	Yellow Carpet Mastic	D	Room 7	ND
8	C	Yellow Carpet Mastic	D	Room 17	ND
9	C	Yellow Carpet Mastic	D	Room 30	ND
10	D	2'x2' Suspended Ceiling Tile - Dot Pattern	D	Room 17	ND
11	D	2'x2' Suspended Ceiling Tile - Dot Pattern	D	Room 16	ND
12	D	2'x2' Suspended Ceiling Tile - Dot Pattern	D	Room 33	ND
13	E	2'x2' Suspended Ceiling Tile - Rough	D	Room 26	ND
14	E	2'x2' Suspended Ceiling Tile - Rough	D	Room 32	ND
15	E	2'x2' Suspended Ceiling Tile - Rough	D	Room 29	ND
16	F	Black Mirror Mastic	D	Room 2	5% Chrysotile
17	F	Black Mirror Mastic	D	Room 3	5% Chrysotile
18	F	Black Mirror Mastic	D	Room 20	5% Chrysotile
19	G	Drywall & Joint Compound with Texture Coat	B	Room 11	Joint Compound = <1% Chrysotile Drywall = ND Composite = ND<0.1%
20	G	Drywall & Joint Compound with Texture Coat	B	Room 20	Joint Compound = <1% Chrysotile Drywall = ND Composite = ND<0.1%

TABLE 2 - ASBESTOS SAMPLE RESULTS

Sample Number	HA Number	Type of Material	Location		Asbestos Content
			Building	Room	
21	G	Drywall & Joint Compound with Texture Coat	B	Room 6	Joint Compound = <1% Chrysotile Drywall = ND Composite = ND<0.1%
22	H	White Mastic Behind Gray Cove Base	B	Room 11	ND
23	H	White Mastic Behind Gray Cove Base	B	Room 20	ND
24	H	White Mastic Behind Gray Cove Base	B	Room 19	ND
25	I	Yellow Carpet Mastic	B	Room 19/20	ND
26	I	Yellow Carpet Mastic	B	Room 6	ND
27	I	Yellow Carpet Mastic	B	Room 19	ND
28	J	White Carpet Mastic	B	Room 12	ND
29	J	White Carpet Mastic with Black Mastic	B	Room 14	Carpet Mastic = ND Black Mastic = 2% Chrysotile
30	J	White Carpet Mastic	B	Room 9	ND
31	K	2'x2' Suspended Ceiling Tile - Dot Pattern	B	Room 20	ND
32	K	2'x2' Suspended Ceiling Tile - Dot Pattern	B	Room 15	ND
33	K	2'x2' Suspended Ceiling Tile - Dot Pattern	B	Room 4	ND
34	L	Gray 12"x12" Floor Tile (no mastic)	B	Room 7	ND
35	L	Gray 12"x12" Floor Tile (no mastic)	B	Room 7	ND
36	M	Vinyl Covered Drywall	B	Room 22	ND
37	M	Vinyl Covered Drywall	B	Room 8	ND
38	QQ	Gray 12"x12" Floor Tile	B	Room 8	ND
39	QQ	Gray 12"x12" Floor Tile	B	Room 8	ND
40	N	Drywall & Joint Compound with Texture Coat	B	Room 7	Joint Compound = <1% Chrysotile Drywall = ND Composite = ND<0.1%
41	N	Drywall & Joint Compound with Texture Coat	B	Room 7	Joint Compound = <1% Chrysotile Drywall = ND Composite = ND<0.1%

TABLE 2 - ASBESTOS SAMPLE RESULTS

Sample Number	HA Number	Type of Material	Location		Asbestos Content
			Building	Room	
42	O	Drywall & Joint Compound	B	Room 8	Joint Compound = <1% Chrysotile Drywall = ND Composite = ND<0.1%
43	O	Drywall & Joint Compound	B	Room 16	Joint Compound = <1% Chrysotile Drywall = ND Composite = ND<0.1%
44	O	Drywall & Joint Compound	B	Room 17	Joint Compound = <1% Chrysotile Drywall = ND Composite = ND<0.1%
45	G	Drywall & Joint Compound with Texture Coat	B	Room 16	Joint Compound = <1% Chrysotile Drywall = ND Composite = ND<0.1%
46	P	White Mastic Behind Black Cove Base	B	Room 16	ND
47	P	White Mastic Behind Black Cove Base	B	Room 17	ND
48	Q	Particle Board	B	Room 18 (back of room 7)	ND
49	Q	Particle Board	B	Room 18 (back of room 6)	ND
50	R	Black Mirror Mastic	B	Room 16	ND
51	R	Black Mirror Mastic	B	Roof Section C	ND
52	S	Brown Mastic Behind Particle Board	B	Room 18	ND
53	S	Brown Mastic Behind Particle Board	B	Room 18	ND
54	T	Beige Flooring with Yellow Carpet Glue	B	Room 1	Floor Tile = ND Yellow Glue = ND
55	T	Beige Flooring with Yellow Carpet Glue	B	Room 1	Floor Tile = ND Yellow Glue = ND
56	U	2'x4' Suspended Ceiling Tile - Dot Pattern	B	Room 7	ND
57	U	2'x4' Suspended Ceiling Tile - Dot Pattern	B	Room 7	ND
58	RR	Drywall & Joint Compound	B	Room 18	Joint Compound = ND Drywall = ND

TABLE 2 - ASBESTOS SAMPLE RESULTS

Sample Number	HA Number	Type of Material	Location		Asbestos Content
			Building	Room	
59	RR	Drywall & Joint Compound	B	Room 18	Joint Compound = ND Drywall = ND
60	V	Yellow Carpet Mastic	A	Room 42	ND
61	V	Yellow Carpet Mastic	A	Room 10	ND
62	W	Beige Mastic Behind Black Cove Base	A	Room 42	ND
63	W	Beige Mastic Behind Black Cove Base	A	Room 42	ND
64	W	Beige Mastic Behind Black Cove Base	A	Room 9	ND
65	W	Beige Mastic Behind Black Cove Base	A	Room 37	ND
66	X	2'x2' Suspended Ceiling Tile - Rough	A	Room 42	ND
67	X	2'x2' Suspended Ceiling Tile - Rough	A	Room 10	ND
68	X	2'x2' Suspended Ceiling Tile - Rough	A	Room 20	ND
69	Y	Drywall & Joint Compound with Texture Coat	A	Room 13	Texture Coat = ND Joint Compound = ND Drywall = ND
70	Y	Drywall & Joint Compound with Texture Coat	A	Room 42	Texture Coat = ND Joint Compound = ND Drywall = ND
71	Y	Drywall & Joint Compound with Texture Coat	A	Room 20	Texture Coat = ND Joint Compound = ND Drywall = ND
72	Y	Drywall & Joint Compound with Texture Coat	A	Room 18	Texture Coat = ND Joint Compound = 0.1% Chrysotile Drywall = ND
73	Z	Floor Leveling Compound with Yellow Carpet Glue	A	Room 13	Leveling Compound = ND Yellow Glue = ND
74	Z	Floor Leveling Compound with Yellow Carpet Glue	A	Room 10	Leveling Compound = ND Yellow Glue = ND
75	Z	Floor Leveling Compound with Yellow Carpet Glue	A	Room 20	Leveling Compound = ND Yellow Glue = ND
76	AA	Drywall & Joint Compound	A	Room 12	Top Coat = ND Joint Compound = ND Drywall = ND

TABLE 2 - ASBESTOS SAMPLE RESULTS

Sample Number	HA Number	Type of Material	Location		Asbestos Content
			Building	Room	
77	AA	Drywall & Joint Compound	A	Room 12	Top Coat = ND Joint Compound = ND Drywall = ND
78	AA	Drywall & Joint Compound	A	Room 26	Top Coat = ND Joint Compound = ND Drywall = ND
79	BB	Tan & Brown Flooring with Brown Mastic	A	Room 28	Flooring = 20% Chrysotile Brown Mastic = ND
80	BB	Tan & Brown Flooring with Black Mastic	A	Room 28	Flooring = 20% Chrysotile Black Mastic = 5% Chrysotile
81	BB	Tan & Brown Flooring with Brown Mastic	A	Room 28	Flooring = 20% Chrysotile Brown Mastic = ND
82	BB	Tan & Brown Flooring with Black Mastic	A	Room 28	Flooring = 20% Chrysotile Black Mastic = 5% Chrysotile
83	TT	Felt Backing, Leveling Compound & Black Mastic	A	Room 29	Felt Backing = ND Black Mastic = 5% Chrysotile Leveling Compound = ND
84	TT	Felt Backing, Leveling Compound & Black Mastic	A	Room 29	Felt Backing = ND Black Mastic = 5% Chrysotile Leveling Compound = ND
85	CC	White Mastic Behind Brown Cove Base	A	Room 7	ND
86	CC	White Mastic Behind Brown Cove Base	A	Room 19	ND
87	DD	White Mastic Behind Gray Cove Base	A	Room 6	ND
88	DD	White Mastic Behind Gray Cove Base	A	Room 4	ND
89	DD	White Mastic Behind Gray Cove Base	A	Room 17	ND
90	EE	Gray Floor Leveling Compound	A	Room 4	ND
91	EE	Gray Floor Leveling Compound	A	Room 4	ND
92	UU	Flooring Backing with Black Mastic	A	Room 6	Felt Backing = ND Black Mastic = 5% Chrysotile

TABLE 2 - ASBESTOS SAMPLE RESULTS

Sample Number	HA Number	Type of Material	Location		Asbestos Content
			Building	Room	
93	UU	Flooring Backing with Black Mastic	A	Room 6	Felt Backing = ND Black Mastic = 5% Chrysotile
94	FF	Drywall & Joint Compound	A	Room 6	Joint Compound = 2% Chrysotile Drywall = ND
95	FF	Drywall & Joint Compound	A	Room 5	Joint Compound = 2% Chrysotile Drywall = ND
96	GG	Drywall	A	Room 4	ND
97	GG	Drywall	A	Room 1	ND
98	GG	Drywall	A	Room 2	ND
99	HH	Drywall & Joint Compound	A	Room 45	Joint Compound = ND Drywall = ND
100	HH	Drywall & Joint Compound	A	Room 23	Joint Compound = ND Drywall = ND
101	HH	Drywall & Joint Compound	A	Room 21	Joint Compound = ND Drywall = ND
102	II	Drywall & Joint Compound with Brown Mastic	A	Room 45 (back of room 18)	Joint Compound = ND Drywall = ND Brown Mastic = ND
103	II	Drywall & Joint Compound with Brown Mastic	A	Room 45 (back of room 17)	Joint Compound = ND Drywall = ND Brown Mastic = ND
104	WW	Joint Compound	A	Room 45 (back of room 20)	ND
105	WW	Joint Compound	A	Room 45 (back of room 20)	ND
106	VV	Joint Compound with Brown Mastic	A	Room 45 (back of room 20)	Joint Compound = ND Brown Mastic = ND

TABLE 2 - ASBESTOS SAMPLE RESULTS

Sample Number	HA Number	Type of Material	Location		Asbestos Content
			Building	Room	
107	VV	Joint Compound with Brown Mastic	A	Room 45 (back of room 20)	Joint Compound = ND Brown Mastic = ND
108	JJ	Gray 12"x12" Floor Tile with Brown Mastic	A	Room 32	Floor Tile = ND Brown Mastic = ND
109	JJ	Gray 12"x12" Floor Tile with Brown Mastic	A	Room 36	Floor Tile = ND Brown Mastic = ND
110	JJ	Gray 12"x12" Floor Tile with Brown Mastic	A	Room 35	Floor Tile = ND Brown Mastic = ND
111	KK	Drywall & Joint Compound	A	Room 32	Joint Compound = ND Drywall = ND
112	KK	Drywall & Joint Compound	A	Room 36	Joint Compound = ND Drywall = ND
113	KK	Drywall & Joint Compound	A	Room 35	Joint Compound = ND Drywall = ND
114	LL	White Mastic Behind Black Cove Base	A	Room 33	ND
115	LL	White Mastic Behind Black Cove Base	A	Room 37	ND
116	MMa	Brown Mirror Mastic	A	Room 26	ND
117	MMb	Black Mirror Mastic	A	Room 23	15% Chrysotile
118	MMa	Brown Mirror Mastic	A	Room 26	ND
119	MMb	Black Mirror Mastic	A	Room 23	15% Chrysotile
120	NN	Drywall & Joint Compound	A	Room 43	Joint Compound = <1% Chrysotile Drywall = ND Composite = ND<0.1%
121	NN	Drywall & Joint Compound	A	Room 44	Joint Compound = <1% Chrysotile Drywall = ND Composite = ND<0.1%
122	NN	Drywall & Joint Compound	A	Room 44	Joint Compound = <1% Chrysotile Drywall = ND Composite = ND<0.1%
123	OO	2'x4' Suspended Ceiling Tile	A	Room 44	ND
124	OO	2'x4' Suspended Ceiling Tile	A	Room 44	ND

TABLE 2 - ASBESTOS SAMPLE RESULTS

Sample Number	HA Number	Type of Material	Location		Asbestos Content
			Building	Room	
125	PP	White Mastic Behind Black Cove Base	A	Room 44	ND
126	PP	White Mastic Behind Black Cove Base	A	Room 44	ND
127	SS	Gray Sheet Flooring with White Mastic	A	Room 18	Flooring = ND White Mastic = ND
128	SS	Gray Sheet Flooring with White Mastic	A	Room 18	Flooring = ND White Mastic = ND
129	XX	Tan 12"x12" Floor Tile with Black Mastic	A	Room 18	Floor Tile = 5% Chrysotile Black Mastic = 10% Chrysotile
130	XX	Tan 12"x12" Floor Tile with Black Mastic	A	Room 17	Floor Tile = 5% Chrysotile Black Mastic = 10% Chrysotile
131	YY	Gray Mastic	A	Room 24 (under sink)	ND
132	ZZ	Layered Roof Core	A	Roof	Cap Sheet = ND Felt Layer 1 = ND Felt Layer 2 = ND
133	ZZ	Layered Roof Core	A	Roof	Cap Sheet = ND Felt Layer 1 = ND Felt Layer 2 = ND
134	ZZ	Layered Roof Core	A	Roof	Cap Sheet = ND Felt Layer 1 = ND Felt Layer 2 = ND
135	AAA	Gray Mastic	A	Roof - AC Unit	5% Chrysotile
136	AAA	Gray Mastic	A	Roof - AC Unit	5% Chrysotile
137	AAA	Gray Mastic	A	Roof - AC Unit	5% Chrysotile
138	BBB	Black Mastic with White Paint	A	Roof Vent	ND
139	BBB	Black Mastic with White Paint	A	Roof Vent	ND
140	CCC	Dark Gray Mastic	A	Roof Penetration	ND
141	CCC	Dark Gray Mastic	A	Roof Penetration	ND
142	CCC	Dark Gray Mastic	A	Roof Penetration	ND
143	DDD	Black Mastic with Silver Paint	A	Roof - AC Unit	5% Chrysotile
144	DDD	Black Mastic with Silver Paint	A	Roof - AC Unit	5% Chrysotile
145	EEE	Black Mastic with Pebble Texture	A	Roof - AC Unit	5% Chrysotile
146	EEE	Black Mastic with Pebble Texture	A	Roof - AC Unit	5% Chrysotile
147	FFF	White Cove with Felt	A	Parapet Wall	ND
148	FFF	White Cove with Felt	A	Roof - AC Unit	ND
149	FFF	White Cove with Felt	A	Skylight	ND

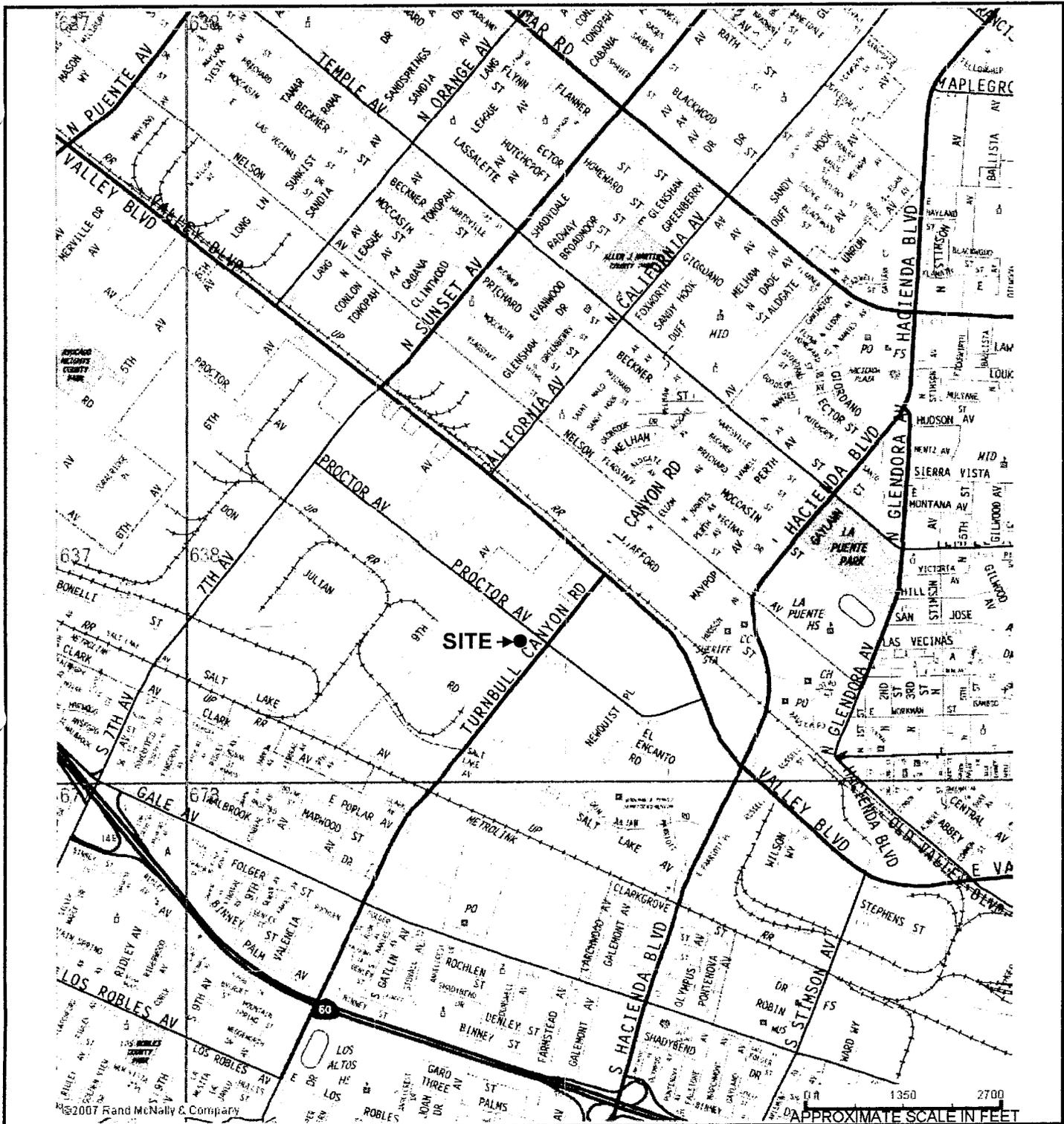
TABLE 2 - ASBESTOS SAMPLE RESULTS

Sample Number	HA Number	Type of Material	Location		Asbestos Content
			Building	Room	
150	OOO	Gray Mastic	A	Patches on Parapet Walls	5% Chrysotile
151	OOO	Gray Mastic	A	Patches on Parapet Walls	5% Chrysotile
152	PPP	Walking Pads	A	Roof	ND
153	PPP	Walking Pads	A	Roof	ND
154	GGG	Layered Roof Core	B	Roof	Cap Sheet = ND
155	GGG	Layered Roof Core	B	Roof	Cap Sheet = ND Felt Layer 1 = ND Felt Layer 2 = ND
156	GGG	Layered Roof Core	B	Roof	Cap Sheet = ND Felt Layer 1 = ND Felt Layer 2 = ND
157	HHH	Black Mastic	B	Roof - AC Unit	ND
158	HHH	Black Mastic	B	Skylight	ND
159	HHH	Black Mastic	B	Skylight	ND
160	III	Gray Mastic	B	Roof Vent	ND
161	III	Gray Mastic	B	Roof Vent	ND
162	JJJ	Gray Mastic	A/B	Parapet Wall Flashing	ND
163	JJJ	Gray Mastic	A/B	Parapet Wall Flashing	10% Chrysotile
164	QQQ	Gray Mastic	B	AC Unit Ducting	ND
165	QQQ	Gray Mastic	B	Vent Ducting	5% Chrysotile
166	QQQ	Gray Mastic	B	Vent Ducting	5% Chrysotile
167	KKK	Layered Roof Core	C	Roof	Cap Sheet = ND Felt Layer 1 = ND Felt Layer 2 = ND
168	KKK	Layered Roof Core	C	Roof	Cap Sheet = ND Felt Layer 1 = ND Felt Layer 2 = ND
169	KKK	Layered Roof Core	C	Roof	Cap Sheet = ND Felt Layer 1 = ND Felt Layer 2 = ND
170	MMM	White Caulk	C	Parapet Wall Flashing	ND
171	MMM	White Caulk	C	Parapet Wall Flashing	ND
172	MMM	White Caulk	C	Parapet Wall Flashing	ND

TABLE 2 - ASBESTOS SAMPLE RESULTS

Sample Number	HA Number	Type of Material	Location		Asbestos Content
			Building	Room	
173	NNN	Black Mastic with Pebble Texture	C	Skylight	ND
174	NNN	Black Mastic with Pebble Texture	C	Roof Vent	ND
175	NNN	Black Mastic with Pebble Texture	C	Skylight	ND
176	LLL	White Siding with White Mastic	C	Parapet Wall	Siding = ND White Mastic = ND
177	LLL	White Siding with White Mastic	C	Parapet Wall	Siding = ND White Mastic = ND
178	RRR	Layered Roof Core	D	Roof	Cap Sheet = ND Felt Layer 1 = ND Felt Layer 2 = ND
179	RRR	Layered Roof Core	D	Roof	Cap Sheet = ND Felt Layer 1 = ND Felt Layer 2 = ND
180	SSS	Black Mastic with Silver Paint	D	Roof Vent	ND
181	SSS	Black Mastic with Silver Paint	D	Roof Vent	ND
182	SSS	Black Mastic with Silver Paint	D	Roof - AC Unit	ND
183	TTT	Dark Gray Mastic	B	Parapet Wall Flashing at Bldg. D	5% Chrysotile
184	TTT	Dark Gray Mastic	B	Parapet Wall Flashing at Bldg. D	5% Chrysotile
185	VVV	Light Gray Mastic	B	Parapet Wall Flashing at Bldg. D	ND
186	VVV	Light Gray Mastic	B	Parapet Wall Flashing at Bldg. D	ND
187	UUU	Beige Textured Stucco	D	Parapet Wall	ND
188	UUU	Beige Textured Stucco	D	Exterior	ND
189	UUU	Beige Textured Stucco	D	Exterior	ND
190	WWW	Black Window Putty	B	Front Window	ND
191	WWW	Black Window Putty	A	Front Window	ND
192	WWW	Black Window Putty	A	Front Window	ND
193	XXX	Textured Stucco	B	Exterior	ND
194	XXX	Textured Stucco	A	Exterior	ND
195	XXX	Textured Stucco	A	Exterior	ND

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

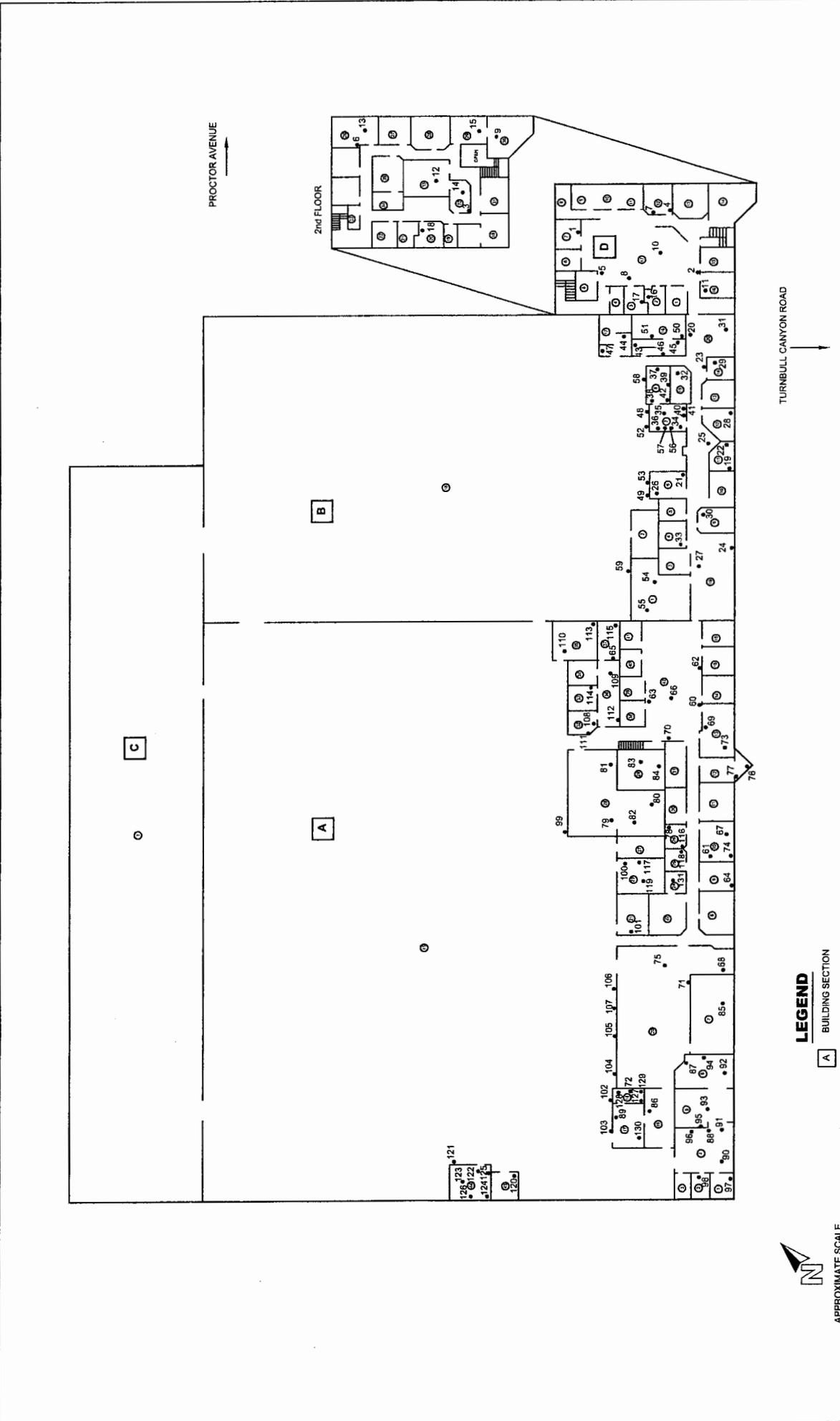


REFERENCE: 2007 RAND MCNALLY DIGITAL EDITION FOR LOS ANGELES/ORANGE COUNTY, STREET GUIDE AND DIRECTORY



NOTE: ALL DIMENSIONS, DIRECTIONS, AND LOCATIONS ARE APPROXIMATE

	PROJECT NO.	SITE LOCATION MAP 333 TURNBULL CANYON ROAD CITY OF INDUSTRY, CALIFORNIA	FIGURE
	DATE		1
	100252002		
	8/11		



ARDENT
ENVIRONMENTAL
LABORATORY

LEGEND

- A BUILDING SECTION
- ① ROOM NUMBER
- SAMPLE LOCATION

APPROXIMATE SCALE

0 40 80 FEET

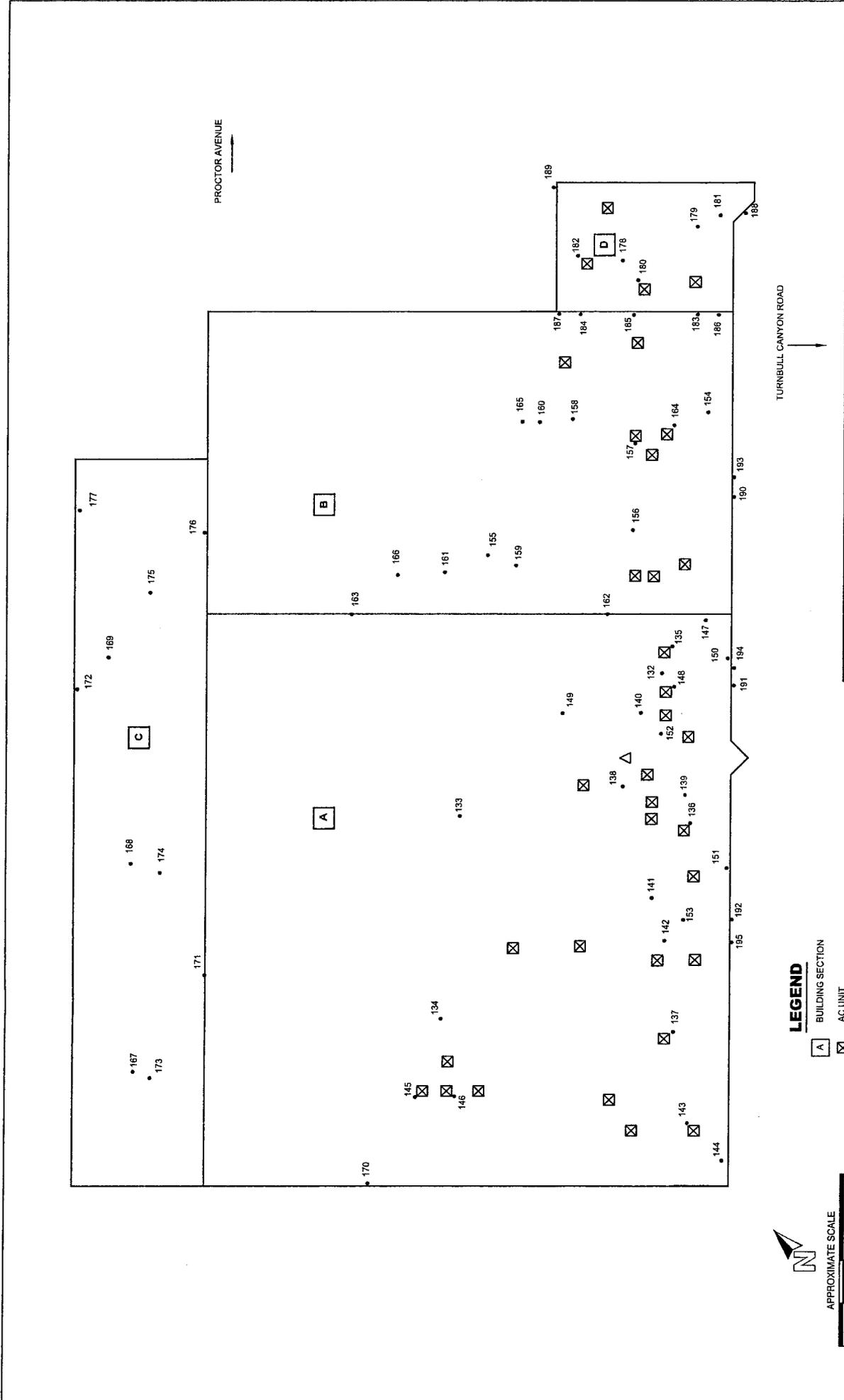
NOTE: ALL DIMENSIONS, DIRECTIONS AND LOCATIONS ARE APPROXIMATE.

PROJECT NO. 100252002
DATE 8/11

SAMPLE LOCATION MAP

333 TURNBULL CANYON ROAD
CITY OF INDUSTRY, CALIFORNIA

FIGURE **2**



ARDENT
PROFESSIONAL ENGINEERS & ARCHITECTS

PROJECT NO. 100252002	DATE 8/11
ROOF SAMPLE LOCATION MAP	
333 TURNBULL CANYON ROAD CITY OF INDUSTRY, CALIFORNIA	

FIGURE
3

LEGEND

- A BUILDING SECTION
- X AC UNIT
- △ ROOF ACCESS HATCH
- SAMPLE LOCATION

APPROXIMATE SCALE

0 40 80 FEET

NOTE: ALL DIMENSIONS, DIRECTIONS AND LOCATIONS ARE APPROXIMATE.

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: 100252002; 333 Turnbull Cyn Rd.
EML ID: 807194

Approved by:

Dates of Analysis:
Asbestos-EPA Method 600/R-93/116: 07-22-2011

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: 100252002; 333 Turnbull Cnyn Rd.

Date of Sampling: 07-14-2011
 Date of Receipt: 07-19-2011
 Date of Report: 07-22-2011

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

Total Samples Submitted: 59
Total Samples Analysed: 59

Total Samples with Layer Asbestos Content > 1%: 6

Location: 1, Drywall and joint compound

Lab ID-Version‡: 3576915-1

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: 2, Drywall and joint compound

Lab ID-Version‡: 3576916-1

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: 3, Drywall and joint compound

Lab ID-Version‡: 3576917-1

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: 4, White mastic

Lab ID-Version‡: 3576918-1

Sample Layers	Asbestos Content
White 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.

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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: 100252002; 333 Turnbull Cnyn Rd.

Date of Sampling: 07-14-2011
 Date of Receipt: 07-19-2011
 Date of Report: 07-22-2011

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

Location: 5, White mastic

Lab ID-Version‡: 3576919-1

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

Location: 6, White mastic

Lab ID-Version‡: 3576920-1

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

Location: 7, Yellow carpet glue

Lab ID-Version‡: 3576921-1

Sample Layers	Asbestos Content
Yellow Carpet Glue	ND
Sample Composite Homogeneity: Good	

Location: 8, Yellow carpet glue

Lab ID-Version‡: 3576922-1

Sample Layers	Asbestos Content
Yellow Carpet Glue	ND
Sample Composite Homogeneity: Good	

Location: 9, Yellow carpet glue

Lab ID-Version‡: 3576923-1

Sample Layers	Asbestos Content
Yellow Carpet Glue	ND
Sample Composite Homogeneity: Good	

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Client: Ardent Environmental Group, Inc.
 C/O: Mr. Craig Metheny
 Re: 100252002; 333 Turnbull Cnyn Rd.

Date of Sampling: 07-14-2011
 Date of Receipt: 07-19-2011
 Date of Report: 07-22-2011

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

Location: 10, Ceiling tile 2 x 2

Lab ID-Version‡: 3576924-1

Sample Layers	Asbestos Content
Gray Ceiling Tile with White Surface	ND
Composite Non-Asbestos Fibrous Content:	45% Cellulose 30% Mineral wool
Sample Composite Homogeneity:	Good

Location: 11, Ceiling tile 2 x 2

Lab ID-Version‡: 3576925-1

Sample Layers	Asbestos Content
Gray Ceiling Tile with White Surface	ND
Composite Non-Asbestos Fibrous Content:	45% Cellulose 30% Mineral wool
Sample Composite Homogeneity:	Good

Location: 12, Ceiling tile 2 x 2

Lab ID-Version‡: 3576926-1

Sample Layers	Asbestos Content
Gray Ceiling Tile with White Surface	ND
Composite Non-Asbestos Fibrous Content:	45% Cellulose 30% Mineral wool
Sample Composite Homogeneity:	Good

Location: 13, Ceiling tile- rough 2 x 2

Lab ID-Version‡: 3576927-1

Sample Layers	Asbestos Content
Gray Ceiling Tile With White Paint	ND
Composite Non-Asbestos Fibrous Content:	85% Mineral wool 5% Cellulose
Sample Composite Homogeneity:	Good

Location: 14, Ceiling tile- rough 2 x 2

Lab ID-Version‡: 3576928-1

Sample Layers	Asbestos Content
Gray Ceiling Tile With White Paint	ND
Composite Non-Asbestos Fibrous Content:	85% Mineral wool 5% Cellulose
Sample Composite Homogeneity:	Good

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Client: Ardent Environmental Group, Inc.
 C/O: Mr. Craig Metheny
 Re: 100252002; 333 Turnbull Cnyn Rd.

Date of Sampling: 07-14-2011
 Date of Receipt: 07-19-2011
 Date of Report: 07-22-2011

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

Location: 15, Ceiling tile- rough 2 x 2

Lab ID-Version‡: 3576929-1

Sample Layers	Asbestos Content
Gray Ceiling Tile With White Paint	ND
Composite Non-Asbestos Fibrous Content:	85% Mineral wool 5% Cellulose
Sample Composite Homogeneity:	Good

Location: 16, Black mirror mastic

Lab ID-Version‡: 3576930-1

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

Location: 17, Black mirror mastic

Lab ID-Version‡: 3576931-1

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

Location: 18, Black mirror mastic

Lab ID-Version‡: 3576932-1

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

Location: 19, Drywall and joint compound w/ texture

Lab ID-Version‡: 3576933-1

Sample Layers	Asbestos Content
White Joint Compound With Paint	< 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.

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Client: Ardent Environmental Group, Inc.
C/O: Mr. Craig Metheny
Re: 100252002; 333 Turnbull Cnyn Rd.Date of Sampling: 07-14-2011
Date of Receipt: 07-19-2011
Date of Report: 07-22-2011**ASBESTOS PLM REPORT: EPA-600/M4-82-020 & EPA METHOD 600/R-93-116****Location: 20, Drywall and joint compound w/ texture**

Lab ID-Version‡: 3576934-1

Sample Layers	Asbestos Content
White Joint Compound With Paint	< 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: 21, Drywall and joint compound w/ texture

Lab ID-Version‡: 3576935-1

Sample Layers	Asbestos Content
White Joint Compound With Paint	< 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: 22, White mastic

Lab ID-Version‡: 3576936-1

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

Location: 23, White mastic

Lab ID-Version‡: 3576937-1

Sample Layers	Asbestos Content
White Mastic	ND
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: 100252002; 333 Turnbull Cnyn Rd.

Date of Sampling: 07-14-2011
 Date of Receipt: 07-19-2011
 Date of Report: 07-22-2011

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

Location: 24, White mastic

Lab ID-Version‡: 3576938-1

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

Location: 25, Yellow carpet glue

Lab ID-Version‡: 3576939-1

Sample Layers	Asbestos Content
Yellow Carpet Glue	ND
Sample Composite Homogeneity:	Good

Location: 26, Yellow carpet glue

Lab ID-Version‡: 3576940-1

Sample Layers	Asbestos Content
Yellow Carpet Glue	ND
Sample Composite Homogeneity:	Good

Location: 27, Yellow carpet glue

Lab ID-Version‡: 3576941-1

Sample Layers	Asbestos Content
Yellow Carpet Glue	ND
Sample Composite Homogeneity:	Good

Location: 28, White carpet glue

Lab ID-Version‡: 3576942-1

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

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Client: Ardent Environmental Group, Inc.
C/O: Mr. Craig Metheny
Re: 100252002; 333 Turnbull Cnyn Rd.Date of Sampling: 07-14-2011
Date of Receipt: 07-19-2011
Date of Report: 07-22-2011**ASBESTOS PLM REPORT: EPA-600/M4-82-020 & EPA METHOD 600/R-93-116****Location: 29, White carpet glue**

Lab ID-Version‡: 3576943-1

Sample Layers	Asbestos Content
Black/White Carpet Glue	2% Chrysotile
Sample Composite Homogeneity:	Good

Location: 30, White carpet glue

Lab ID-Version‡: 3576944-1

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

Location: 31, Ceiling tile 2 x 2

Lab ID-Version‡: 3576945-1

Sample Layers	Asbestos Content
Gray Ceiling Tile with White Surface	ND
Composite Non-Asbestos Fibrous Content:	45% Cellulose 30% Mineral wool
Sample Composite Homogeneity:	Good

Location: 32, Ceiling tile 2 x 2

Lab ID-Version‡: 3576946-1

Sample Layers	Asbestos Content
Gray Ceiling Tile with White Surface	ND
Composite Non-Asbestos Fibrous Content:	45% Cellulose 30% Mineral wool
Sample Composite Homogeneity:	Good

Location: 33, Ceiling tile 2 x 2

Lab ID-Version‡: 3576947-1

Sample Layers	Asbestos Content
Gray Ceiling Tile with White Surface	ND
Composite Non-Asbestos Fibrous Content:	45% 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.

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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: 100252002; 333 Turnbull Cnyn Rd.

Date of Sampling: 07-14-2011
 Date of Receipt: 07-19-2011
 Date of Report: 07-22-2011

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

Location: 34, Gray 12 x 12 ft

Lab ID-Version‡: 3576948-1

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

Location: 35, Gray 12 x 12 ft

Lab ID-Version‡: 3576949-1

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

Location: 36, Vinyl covered drywall

Lab ID-Version‡: 3576950-1

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

Location: 37, Vinyl covered drywall

Lab ID-Version‡: 3576951-1

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

Location: 38, Gray 12 x 12 ft w/ yellow mastic

Lab ID-Version‡: 3576952-1

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

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Client: Ardent Environmental Group, Inc.
C/O: Mr. Craig Metheny
Re: 100252002; 333 Turnbull Cynyn Rd.

Date of Sampling: 07-14-2011
Date of Receipt: 07-19-2011
Date of Report: 07-22-2011

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

Location: 39, Gray 12 x 12 ft w/ yellow mastic

Lab ID-Version‡: 3576953-1

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

Location: 40, Drywall and joint compound w/ texture

Lab ID-Version‡: 3576954-1

Sample Layers	Asbestos Content
White Joint Compound With Paint	< 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: 41, Drywall and joint compound w/ texture

Lab ID-Version‡: 3576955-1

Sample Layers	Asbestos Content
White Joint Compound With Paint	< 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: 42, Drywall and joint compound

Lab ID-Version‡: 3576956-1

Sample Layers	Asbestos Content
White Joint Compound With Paint	< 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.

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

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Client: Ardent Environmental Group, Inc.
C/O: Mr. Craig Metheny
Re: 100252002; 333 Turnbull Cnyn Rd.

Date of Sampling: 07-14-2011
Date of Receipt: 07-19-2011
Date of Report: 07-22-2011

ASBESTOS PLM REPORT: EPA-600/M4-82-020 & EPA METHOD 600/R-93-116**Location: 43, Drywall and joint compound**

Lab ID-Version‡: 3576957-1

Sample Layers	Asbestos Content
White Joint Compound With Paint	< 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: 44, Drywall and joint compound

Lab ID-Version‡: 3576958-1

Sample Layers	Asbestos Content
White Joint Compound With Paint	< 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: 45, Drywall and joint compound w/ texture

Lab ID-Version‡: 3576959-1

Sample Layers	Asbestos Content
White Joint Compound With Paint	< 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: 46, White mastic

Lab ID-Version‡: 3576960-1

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

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Client: Ardent Environmental Group, Inc.
 C/O: Mr. Craig Metheny
 Re: 100252002; 333 Turnbull Cnyn Rd.

Date of Sampling: 07-14-2011
 Date of Receipt: 07-19-2011
 Date of Report: 07-22-2011

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

Location: 47, White mastic

Lab ID-Version‡: 3576961-1

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

Location: 48, Particle board

Lab ID-Version‡: 3576962-1

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

Location: 49, Particle board

Lab ID-Version‡: 3576963-1

Sample Layers	Asbestos Content
Gray Ceiling Tile with White Surface	ND
Composite Non-Asbestos Fibrous Content:	40% Cellulose 30% Mineral wool 10% Synthetic Fibers
Sample Composite Homogeneity:	Good

Location: 50, Black mirror mastic

Lab ID-Version‡: 3576964-1

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

Location: 51, Black mirror mastic

Lab ID-Version‡: 3576965-1

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

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 C/O: Mr. Craig Metheny
 Re: 100252002; 333 Turnbull Cnyn Rd.

Date of Sampling: 07-14-2011
 Date of Receipt: 07-19-2011
 Date of Report: 07-22-2011

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

Location: 52, Brown mastic

Lab ID-Version‡: 3576966-1

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

Location: 53, Brown mastic

Lab ID-Version‡: 3576967-1

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

Location: 54, Beige flooring material w/ yellow glue

Lab ID-Version‡: 3576968-1

Sample Layers	Asbestos Content
Beige Floor Tile	ND
Yellow Glue	ND
Sample Composite Homogeneity:	Good

Location: 55, Beige flooring w/ yellow carpet glue

Lab ID-Version‡: 3576969-1

Sample Layers	Asbestos Content
Beige Floor Tile	ND
Yellow Glue	ND
Sample Composite Homogeneity:	Good

Location: 56, Ceiling tile 2 x 4

Lab ID-Version‡: 3576970-1

Sample Layers	Asbestos Content
Gray Ceiling Tile with White Surface	ND
Composite Non-Asbestos Fibrous Content:	45% Cellulose 30% Mineral wool
Sample Composite Homogeneity:	Good

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Client: Ardent Environmental Group, Inc.
 C/O: Mr. Craig Metheny
 Re: 100252002; 333 Turnbull Cnyn Rd.

Date of Sampling: 07-14-2011
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 Date of Report: 07-22-2011

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

Location: 57, Ceiling tile 2 x 4

Lab ID-Version‡: 3576971-1

Sample Layers	Asbestos Content
Gray Ceiling Tile with White Surface	ND
Composite Non-Asbestos Fibrous Content:	45% Cellulose 30% Mineral wool
Sample Composite Homogeneity:	Good

Location: 58, Drywall and joint compound

Lab ID-Version‡: 3576972-1

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: 59, Drywall and joint compound

Lab ID-Version‡: 3576973-1

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

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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: 100252002; 333 Turnbull Cnyn Rd.
EML ID: 807194

Approved by:

Dates of Analysis:
Asbestos-EPA 1000 point count: 08-10-2011

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: 100252002; 333 Turnbull Cnyn Rd.

Date of Sampling: 07-14-2011
 Date of Receipt: 07-19-2011
 Date of Report: 08-10-2011

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

Location:	19 Drywall and joint compound w/ texture		
Total Points Counted:	1000		
Lab ID-Version‡:	3609867-1		
Sample Layers	Asbestos Type	Asbestos Points Counted	Asbestos Concentration (%)
White Drywall And Joint Compound Composite	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.

Location:	20 Drywall and joint compound w/ texture		
Total Points Counted:	1000		
Lab ID-Version‡:	3609868-1		
Sample Layers	Asbestos Type	Asbestos Points Counted	Asbestos Concentration (%)
White Drywall And Joint Compound Composite	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.

Location:	21 Drywall and joint compound w/ texture		
Total Points Counted:	1000		
Lab ID-Version‡:	3609869-1		
Sample Layers	Asbestos Type	Asbestos Points Counted	Asbestos Concentration (%)
White Drywall And Joint Compound Composite	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.

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Client: Ardent Environmental Group, Inc.
 C/O: Mr. Craig Metheny
 Re: 100252002; 333 Turnbull Cnyn Rd.

Date of Sampling: 07-14-2011
 Date of Receipt: 07-19-2011
 Date of Report: 08-10-2011

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

Location:	40 Drywall and joint compound w/ texture		
Total Points Counted:	1000		
Lab ID-Version‡:	3617293-1		
Sample Layers	Asbestos Type	Asbestos Points Counted	Asbestos Concentration (%)
White Drywall And Joint Compound Composite	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.

Location:	41 Drywall and joint compound w/ texture		
Total Points Counted:	1000		
Lab ID-Version‡:	3617294-1		
Sample Layers	Asbestos Type	Asbestos Points Counted	Asbestos Concentration (%)
White Drywall And Joint Compound Composite	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.

Location:	42 Drywall and joint compound		
Total Points Counted:	1000		
Lab ID-Version‡:	3617295-1		
Sample Layers	Asbestos Type	Asbestos Points Counted	Asbestos Concentration (%)
White Drywall And Joint Compound Composite	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.

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Client: Ardent Environmental Group, Inc.
C/O: Mr. Craig Metheny
Re: 100252002; 333 Turnbull Cynyn Rd.

Date of Sampling: 07-14-2011
Date of Receipt: 07-19-2011
Date of Report: 08-10-2011

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

Location:	43 Drywall and joint compound		
Total Points Counted:	1000		
Lab ID-Version‡:	3617299-1		
Sample Layers	Asbestos Type	Asbestos Points Counted	Asbestos Concentration (%)
White Drywall And Joint Compound Composite	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.

Location:	44 Drywall and joint compound		
Total Points Counted:	1000		
Lab ID-Version‡:	3617304-1		
Sample Layers	Asbestos Type	Asbestos Points Counted	Asbestos Concentration (%)
White Drywall And Joint Compound Composite	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.

Location:	45 Drywall and joint compound w/ texture		
Total Points Counted:	1000		
Lab ID-Version‡:	3609870-1		
Sample Layers	Asbestos Type	Asbestos Points Counted	Asbestos Concentration (%)
White Drywall And Joint Compound Composite	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.

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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: 100252002; 333 Turnbull Canyon Rd.
 EML ID: 808560

Approved by:

Dates of Analysis:
Asbestos-EPA Method 600/R-93/116: 07-27-2011

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.

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Document Number: 200091 - Revision Number: 5

Client: Ardent Environmental Group, Inc.
 C/O: Mr. Craig Metheny
 Re: 100252002; 333 Turnbull Canyon Rd.

Date of Sampling: 07-20-2011
 Date of Receipt: 07-22-2011
 Date of Report: 07-27-2011

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

Total Samples Submitted: 72
Total Samples Analysed: 72
Total Samples with Layer Asbestos Content > 1%: 14

Location: 60, Yellow Carpet Glue

Lab ID-Version‡: 3582978-1

Sample Layers	Asbestos Content
Yellow Carpet Glue	ND
Composite Non-Asbestos Fibrous Content:	5% Synthetic Fibers 2% Cellulose
Sample Composite Homogeneity:	Moderate

Location: 61, Yellow Carpet Glue

Lab ID-Version‡: 3582979-1

Sample Layers	Asbestos Content
Yellow Carpet Glue	ND
Composite Non-Asbestos Fibrous Content:	5% Synthetic Fibers 2% Cellulose
Sample Composite Homogeneity:	Moderate

Location: 62, Beige Mastic

Lab ID-Version‡: 3582980-1

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

Location: 63, Beige Mastic

Lab ID-Version‡: 3582981-1

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

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Client: Ardent Environmental Group, Inc.
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Date of Sampling: 07-20-2011
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ASBESTOS PLM REPORT: EPA-600/M4-82-020 & EPA METHOD 600/R-93-116

Location: 64, Beige Mastic

Lab ID-Version‡: 3582982-1

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

Location: 65, Beige Mastic

Lab ID-Version‡: 3582983-1

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

Location: 66, Ceiling Tile - Rough 2x2

Lab ID-Version‡: 3582984-1

Sample Layers	Asbestos Content
White Ceiling Tile with Silver Foil	ND
Composite Non-Asbestos Fibrous Content:	75% Glass Fibers
Sample Composite Homogeneity:	Moderate

Location: 67, Ceiling Tile - Rough 2x2

Lab ID-Version‡: 3582985-1

Sample Layers	Asbestos Content
White Ceiling Tile with Silver Foil	ND
Composite Non-Asbestos Fibrous Content:	75% Glass Fibers
Sample Composite Homogeneity:	Moderate

Location: 68, Ceiling Tile - Rough 2x2

Lab ID-Version‡: 3582986-1

Sample Layers	Asbestos Content
White Ceiling Tile with Silver Foil	ND
Composite Non-Asbestos Fibrous Content:	75% Glass Fibers
Sample Composite Homogeneity:	Moderate

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Client: Ardent Environmental Group, Inc.
C/O: Mr. Craig Metheny
Re: 100252002; 333 Turnbull Canyon Rd.

Date of Sampling: 07-20-2011
Date of Receipt: 07-22-2011
Date of Report: 07-27-2011

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

Location: 69, Drywall & Joint Compound w/ Texture

Lab ID-Version‡: 3582987-1

Sample Layers	Asbestos Content
White Non-Fibrous Material with Green Paint/Texture	ND
White Joint Compound under Tape	ND
White Drywall	ND
Composite Non-Asbestos Fibrous Content:	5% Cellulose
Sample Composite Homogeneity:	Moderate

Location: 70, Drywall & Joint Compound w/ Texture

Lab ID-Version‡: 3582988-1

Sample Layers	Asbestos Content
White Joint Compound with Tan Paint/Texture	ND
Yellow Woven Material	ND
White Drywall	ND
Composite Non-Asbestos Fibrous Content:	5% Cellulose 2% Glass Fibers
Sample Composite Homogeneity:	Moderate

Location: 71, Drywall & Joint Compound w/ Texture

Lab ID-Version‡: 3582989-1

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

Location: 72, Drywall & Joint Compound w/ Texture

Lab ID-Version‡: 3582990-1

Sample Layers	Asbestos Content
White Non-Fibrous Material with Pink Paint/Texture	ND
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.

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Client: Ardent Environmental Group, Inc.
 C/O: Mr. Craig Metheny
 Re: 100252002; 333 Turnbull Canyon Rd.

Date of Sampling: 07-20-2011
 Date of Receipt: 07-22-2011
 Date of Report: 07-27-2011

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

Location: 73, Leveling Compound w/ Yellow Glue

Lab ID-Version‡: 3582991-1

Sample Layers	Asbestos Content
White Leveling Compound	ND
Yellow Glue	ND
Composite Non-Asbestos Fibrous Content:	2% Cellulose
Sample Composite Homogeneity:	Moderate

Location: 74, Leveling Compound w/ Yellow Glue

Lab ID-Version‡: 3582992-1

Sample Layers	Asbestos Content
White Leveling Compound	ND
Yellow Glue	ND
Composite Non-Asbestos Fibrous Content:	2% Cellulose
Sample Composite Homogeneity:	Moderate

Location: 75, Leveling Compound w/ Yellow Glue

Lab ID-Version‡: 3582993-1

Sample Layers	Asbestos Content
White Leveling Compound	ND
Yellow Glue	ND
Composite Non-Asbestos Fibrous Content:	2% Cellulose
Sample Composite Homogeneity:	Moderate

Location: 76, Drywall & Joint Compound

Lab ID-Version‡: 3582994-1

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

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Client: Ardent Environmental Group, Inc.
C/O: Mr. Craig Metheny
Re: 100252002; 333 Turnbull Canyon Rd.

Date of Sampling: 07-20-2011
Date of Receipt: 07-22-2011
Date of Report: 07-27-2011

ASBESTOS PLM REPORT: EPA-600/M4-82-020 & EPA METHOD 600/R-93-116**Location: 77, Drywall & Joint Compound**

Lab ID-Version‡: 3582995-1

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

Location: 78, Drywall & Joint Compound

Lab ID-Version‡: 3582996-1

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

Location: 79, Tan & Brown Flooring w/ Brown Mastic

Lab ID-Version‡: 3582997-1

Sample Layers	Asbestos Content
Brown/Beige Sheet Flooring with Backing	20% Chrysotile
Brown Mastic	ND
Composite Non-Asbestos Fibrous Content:	2% Cellulose
Sample Composite Homogeneity:	Moderate

Location: 80, Tan & Brown Flooring w/ Black Mastic

Lab ID-Version‡: 3582998-1

Sample Layers	Asbestos Content
Brown/Beige Sheet Flooring with Backing	20% Chrysotile
Black Mastic	5% Chrysotile
Composite Non-Asbestos Fibrous Content:	2% Cellulose
Sample Composite Homogeneity:	Moderate

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 C/O: Mr. Craig Metheny
 Re: 100252002; 333 Turnbull Canyon Rd.

Date of Sampling: 07-20-2011
 Date of Receipt: 07-22-2011
 Date of Report: 07-27-2011

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

Location: 81, Tan & Brown Flooring w/ Brown Mastic

Lab ID-Version‡: 3582999-1

Sample Layers	Asbestos Content
Brown/Beige Sheet Flooring with Backing	20% Chrysotile
Brown Mastic	ND
Composite Non-Asbestos Fibrous Content:	2% Cellulose
Sample Composite Homogeneity:	Moderate

Location: 82, Tan & Brown Flooring w/ Black Mastic

Lab ID-Version‡: 3583000-1

Sample Layers	Asbestos Content
Brown/Beige Sheet Flooring with Backing	20% Chrysotile
Black Mastic	5% Chrysotile
Composite Non-Asbestos Fibrous Content:	2% Cellulose
Sample Composite Homogeneity:	Moderate

Location: 83, Backing, Leveling Compound & Black Mastic

Lab ID-Version‡: 3583001-1

Sample Layers	Asbestos Content
Light Gray Felt Backing	ND
Black Mastic	2% Chrysotile
Gray Leveling Compound	ND
Composite Non-Asbestos Fibrous Content:	25% Cellulose
Sample Composite Homogeneity:	Moderate

Location: 84, Backing, Leveling Compound & Black Mastic

Lab ID-Version‡: 3583002-1

Sample Layers	Asbestos Content
Light Gray Felt Backing	ND
Black Mastic	2% Chrysotile
Gray Leveling Compound	ND
Composite Non-Asbestos Fibrous Content:	25% Cellulose
Sample Composite Homogeneity:	Moderate

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

Location: 85, White Mastic

Lab ID-Version‡: 3583003-1

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

Location: 86, White Mastic

Lab ID-Version‡: 3583004-1

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

Location: 87, White Mastic

Lab ID-Version‡: 3583005-1

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

Location: 88, White Mastic

Lab ID-Version‡: 3583006-1

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

Location: 89, White Mastic

Lab ID-Version‡: 3583007-1

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

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Date of Report: 07-27-2011**ASBESTOS PLM REPORT: EPA-600/M4-82-020 & EPA METHOD 600/R-93-116****Location: 90, Gray Leveling Compound**

Lab ID-Version‡: 3583008-1

Sample Layers	Asbestos Content
Gray Leveling Compound	ND
Composite Non-Asbestos Fibrous Content:	2% Cellulose
Sample Composite Homogeneity:	Moderate

Location: 91, Gray Leveling Compound

Lab ID-Version‡: 3583009-1

Sample Layers	Asbestos Content
Gray Leveling Compound	ND
Composite Non-Asbestos Fibrous Content:	2% Cellulose
Sample Composite Homogeneity:	Moderate

Location: 92, Flooring Backing & Black Mastic

Lab ID-Version‡: 3583010-1

Sample Layers	Asbestos Content
Light Gray Felt Backing	ND
Black Mastic	5% Chrysotile
Composite Non-Asbestos Fibrous Content:	10% Cellulose
Sample Composite Homogeneity:	Moderate

Location: 93, Flooring Backing & Black Mastic

Lab ID-Version‡: 3583011-1

Sample Layers	Asbestos Content
Beige Felt Backing	ND
Black Mastic	5% Chrysotile
Composite Non-Asbestos Fibrous Content:	10% Cellulose
Sample Composite Homogeneity:	Moderate

Location: 94, Drywall & Joint Compound

Lab ID-Version‡: 3583012-1

Sample Layers	Asbestos Content
White Joint Compound with Light Gray Paint	2% 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.

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

Location: 95, Drywall & Joint Compound

Lab ID-Version‡: 3583013-1

Sample Layers	Asbestos Content
White Joint Compound with Light Gray Paint	2% 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: 96, Drywall

Lab ID-Version‡: 3583014-1

Sample Layers	Asbestos Content
White Drywall	ND
Composite Non-Asbestos Fibrous Content:	2% Cellulose
Sample Composite Homogeneity:	Moderate

Location: 97, Drywall

Lab ID-Version‡: 3583015-1

Sample Layers	Asbestos Content
White Drywall	ND
Composite Non-Asbestos Fibrous Content:	2% Cellulose
Sample Composite Homogeneity:	Moderate

Location: 98, Drywall

Lab ID-Version‡: 3583016-1

Sample Layers	Asbestos Content
White Drywall	ND
Composite Non-Asbestos Fibrous Content:	2% Cellulose
Sample Composite Homogeneity:	Moderate

Location: 99, Drywall & Joint Compound

Lab ID-Version‡: 3583017-1

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

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

Location: 100, Drywall & Joint Compound

Lab ID-Version‡: 3583018-1

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

Location: 101, Drywall & Joint Compound

Lab ID-Version‡: 3583019-1

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

Location: 102, Drywall & Joint Compound w/ Brown Mastic

Lab ID-Version‡: 3583020-1

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

Location: 103, Drywall & Joint Compound w/ Brown Mastic

Lab ID-Version‡: 3583021-1

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

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

Location: 104, Joint Compound

Lab ID-Version‡: 3583022-1

Sample Layers	Asbestos Content
White Joint Compound	ND
Composite Non-Asbestos Fibrous Content:	2% Cellulose
Sample Composite Homogeneity:	Moderate

Location: 105, Joint Compound

Lab ID-Version‡: 3583023-1

Sample Layers	Asbestos Content
White Joint Compound	ND
Composite Non-Asbestos Fibrous Content:	2% Cellulose
Sample Composite Homogeneity:	Moderate

Location: 106, Joint Compound w/ Brown Mastic

Lab ID-Version‡: 3583024-1

Sample Layers	Asbestos Content
White Joint Compound	ND
Brown Mastic	ND
Composite Non-Asbestos Fibrous Content:	2% Cellulose
Sample Composite Homogeneity:	Moderate

Location: 107, Joint Compound w/ Brown Mastic

Lab ID-Version‡: 3583025-1

Sample Layers	Asbestos Content
White Joint Compound	ND
Brown Mastic	ND
Composite Non-Asbestos Fibrous Content:	2% Cellulose
Sample Composite Homogeneity:	Moderate

Location: 108, Gray 12x12 VFT w/ Brown Mastic

Lab ID-Version‡: 3583026-1

Sample Layers	Asbestos Content
Gray Floor Tile	ND
Brown Mastic	ND
Sample Composite Homogeneity:	Moderate

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ASBESTOS PLM REPORT: EPA-600/M4-82-020 & EPA METHOD 600/R-93-116**Location: 109, Gray 12x12 VFT w/ Brown Mastic**

Lab ID-Version‡: 3583027-1

Sample Layers	Asbestos Content
Gray Floor Tile	ND
Brown Mastic	ND
Sample Composite Homogeneity:	Moderate

Location: 110, Gray 12x12 VFT w/ Brown Mastic

Lab ID-Version‡: 3583028-1

Sample Layers	Asbestos Content
Gray Floor Tile	ND
Brown Mastic	ND
Sample Composite Homogeneity:	Moderate

Location: 111, Drywall & Joint Compound

Lab ID-Version‡: 3583029-1

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

Location: 112, Drywall & Joint Compound

Lab ID-Version‡: 3583030-1

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

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

Location: 113, Drywall & Joint Compound

Lab ID-Version‡: 3583031-1

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

Location: 114, White Mastic

Lab ID-Version‡: 3583032-1

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

Location: 115, White Mastic

Lab ID-Version‡: 3583033-1

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

Location: 116, Brown Mirror Mastic

Lab ID-Version‡: 3583034-1

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

Location: 117, Black Mirror Mastic

Lab ID-Version‡: 3583035-1

Sample Layers	Asbestos Content
Black Mastic	15% Chrysotile
Sample Composite Homogeneity:	Good

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

Location: 118, Brown Mirror Mastic

Lab ID-Version‡: 3583036-1

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

Location: 119, Black Mirror Mastic

Lab ID-Version‡: 3583037-1

Sample Layers	Asbestos Content
Black Mastic	15% Chrysotile
Sample Composite Homogeneity:	Good

Location: 120, Drywall & Joint Compound

Lab ID-Version‡: 3583038-1

Sample Layers	Asbestos Content
White Joint Compound with Beige Paint	< 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: 121, Drywall & Joint Compound

Lab ID-Version‡: 3583039-1

Sample Layers	Asbestos Content
White Joint Compound with Beige Paint	< 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.

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

Location: 122, Drywall & Joint Compound

Lab ID-Version‡: 3583040-1

Sample Layers	Asbestos Content
White Joint Compound with Beige Paint	< 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: 123, Ceiling Tile 2x4

Lab ID-Version‡: 3583041-1

Sample Layers	Asbestos Content
Light Gray Ceiling Tile with White Surface	ND
Composite Non-Asbestos Fibrous Content:	50% Glass Fibers 35% Cellulose
Sample Composite Homogeneity:	Moderate

Location: 124, Ceiling Tile 2x4

Lab ID-Version‡: 3583042-1

Sample Layers	Asbestos Content
Light Gray Ceiling Tile with White Surface	ND
Composite Non-Asbestos Fibrous Content:	50% Glass Fibers 35% Cellulose
Sample Composite Homogeneity:	Moderate

Location: 125, White Mastic

Lab ID-Version‡: 3583043-1

Sample Layers	Asbestos Content
Off-White Mastic	ND
Sample Composite Homogeneity:	Moderate

Location: 126, White Mastic

Lab ID-Version‡: 3583044-1

Sample Layers	Asbestos Content
Off-White Mastic	ND
Sample Composite Homogeneity:	Moderate

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

Location: 127, Gray Speckled Flooring & White Mastic

Lab ID-Version‡: 3583045-1

Sample Layers	Asbestos Content
Gray/White Sheet Flooring with Backing	ND
Off-White Mastic	ND
Composite Non-Asbestos Fibrous Content:	20% Cellulose 2% Glass Fibers
Sample Composite Homogeneity:	Moderate

Location: 128, Gray Speckled Flooring & White Mastic

Lab ID-Version‡: 3583046-1

Sample Layers	Asbestos Content
Gray/White Sheet Flooring with Backing	ND
Off-White Mastic	ND
Composite Non-Asbestos Fibrous Content:	20% Cellulose 2% Glass Fibers
Sample Composite Homogeneity:	Moderate

Location: 129, Tan 12&12 VFT & Black Mastic

Lab ID-Version‡: 3583047-1

Sample Layers	Asbestos Content
Tan Floor Tile	5% Chrysotile
Black Mastic	10% Chrysotile
Sample Composite Homogeneity:	Good

Location: 130, Tan 12&12 VFT & Black Mastic

Lab ID-Version‡: 3583048-1

Sample Layers	Asbestos Content
Tan Floor Tile	5% Chrysotile
Black Mastic	10% Chrysotile
Sample Composite Homogeneity:	Good

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Date of Report: 07-27-2011**ASBESTOS PLM REPORT: EPA-600/M4-82-020 & EPA METHOD 600/R-93-116****Location: 131, Gray Mastic**

Lab ID-Version‡: 3583049-1

Sample Layers	Asbestos Content
Gray Mastic	ND
Composite Non-Asbestos Fibrous Content:	2% Cellulose
Sample Composite Homogeneity:	Moderate

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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: 100252002; 333 Turnbull Canyon Rd.
 EML ID: 808560

Approved by:

Dates of Analysis:
Asbestos-EPA 1000 point count: 08-10-2011

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: 100252002; 333 Turnbull Canyon Rd.Date of Sampling: 07-20-2011
Date of Receipt: 07-22-2011
Date of Report: 08-10-2011**ASBESTOS POINT COUNT REPORT: EPA METHOD 600/R-93-116**

Location:	72 Drywall & Joint Compound w/ Texture		
Total Points Counted:	1000		
Lab ID-Version‡:	3609879-1		
Sample Layers	Asbestos Type	Asbestos Points Counted	Asbestos Concentration (%)
White Joint Compound / White Drywall Composite	Chrysotile	1	0.1
Layer Totals:		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:	120 Drywall & Joint Compound		
Total Points Counted:	1000		
Lab ID-Version‡:	3609880-1		
Sample Layers	Asbestos Type	Asbestos Points Counted	Asbestos Concentration (%)
White Joint Compound / White Compound Composite	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.

Location:	121 Drywall & Joint Compound		
Total Points Counted:	1000		
Lab ID-Version‡:	3609881-1		
Sample Layers	Asbestos Type	Asbestos Points Counted	Asbestos Concentration (%)
White Joint Compound / White Drywall Composite	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".

Client: Ardent Environmental Group, Inc.
 C/O: Mr. Craig Metheny
 Re: 100252002; 333 Turnbull Canyon Rd.

Date of Sampling: 07-20-2011
 Date of Receipt: 07-22-2011
 Date of Report: 08-10-2011

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

Location:	122 Drywall & Joint Compound		
Total Points Counted:	1000		
Lab ID-Version‡:	3609882-1		
Sample Layers	Asbestos Type	Asbestos Points Counted	Asbestos Concentration (%)
White Joint Compound / White Drywall Composite	Chrysotile	1	0.1
Layer Totals:		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.

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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: 100252002; 333 turnbull Cayn Rd.
EML ID: 814748

Approved by:

Dates of Analysis:
Asbestos-EPA Method 600/R-93/116: 08-11-2011

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: 100252002; 333 turnbull Cayn Rd.

Date of Sampling: 08-02-2011
 Date of Receipt: 08-08-2011
 Date of Report: 08-11-2011

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

Total Samples Submitted:	64
Total Samples Analysed:	64
Total Samples with Layer Asbestos Content > 1%:	14

Location: 132, Roof core section A

Lab ID-Version‡: 3612310-1

Sample Layers	Asbestos Content
Black Roofing Shingle With Gravels	ND
Black Roofing Felt 1	ND
Black Roofing Felt 2	ND
Composite Non-Asbestos Fibrous Content:	40% Cellulose 30% Glass Fibers
Sample Composite Homogeneity:	Good

Location: 133, Roof core section A

Lab ID-Version‡: 3612311-1

Sample Layers	Asbestos Content
Black Roofing Shingle With Gravels	ND
Black Roofing Felt 1	ND
Black Roofing Felt 2	ND
Composite Non-Asbestos Fibrous Content:	40% Cellulose 30% Glass Fibers
Sample Composite Homogeneity:	Good

Location: 134, Roof core section A

Lab ID-Version‡: 3612312-1

Sample Layers	Asbestos Content
Black Roofing Shingle With Gravels	ND
Black Roofing Felt 1	ND
Black Roofing Felt 2	ND
Composite Non-Asbestos Fibrous Content:	40% Cellulose 30% Glass Fibers
Sample Composite Homogeneity:	Good

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Client: Ardent Environmental Group, Inc.
 C/O: Mr. Craig Metheny
 Re: 100252002; 333 turnbull Cayn Rd.

Date of Sampling: 08-02-2011
 Date of Receipt: 08-08-2011
 Date of Report: 08-11-2011

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

Location: 135, Gray mastic

Lab ID-Version‡: 3612313-1

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

Location: 136, Gray mastic

Lab ID-Version‡: 3612314-1

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

Location: 137, Gray mastic

Lab ID-Version‡: 3612315-1

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

Location: 138, Black mastic with white paint

Lab ID-Version‡: 3612316-1

Sample Layers	Asbestos Content
Black Mastic With Paint	ND
Composite Non-Asbestos Fibrous Content:	10% Cellulose
Sample Composite Homogeneity:	Good

Location: 139, Black mastic with white paint

Lab ID-Version‡: 3612317-1

Sample Layers	Asbestos Content
Black Mastic With Paint	ND
Composite Non-Asbestos Fibrous Content:	10% Cellulose
Sample Composite Homogeneity:	Good

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Client: Ardent Environmental Group, Inc.
 C/O: Mr. Craig Metheny
 Re: 100252002; 333 turnbull Cayn Rd.

Date of Sampling: 08-02-2011
 Date of Receipt: 08-08-2011
 Date of Report: 08-11-2011

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

Location: 140, Dark gray mastic

Lab ID-Version‡: 3612318-1

Sample Layers	Asbestos Content
Dark Gray Mastic	ND
Composite Non-Asbestos Fibrous Content:	5% Cellulose
Sample Composite Homogeneity:	Good

Location: 141, Dark gray mastic

Lab ID-Version‡: 3612319-1

Sample Layers	Asbestos Content
Dark Gray Mastic	ND
Composite Non-Asbestos Fibrous Content:	5% Cellulose
Sample Composite Homogeneity:	Good

Location: 142, Dark gray mastic

Lab ID-Version‡: 3612320-1

Sample Layers	Asbestos Content
Dark Gray Mastic	ND
Composite Non-Asbestos Fibrous Content:	5% Cellulose
Sample Composite Homogeneity:	Good

Location: 143, Black mastic with silver paint

Lab ID-Version‡: 3612321-1

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

Location: 144, Black mastic with silver paint

Lab ID-Version‡: 3612322-1

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

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Client: Ardent Environmental Group, Inc.
 C/O: Mr. Craig Metheny
 Re: 100252002; 333 turnbull Cayn Rd.

Date of Sampling: 08-02-2011
 Date of Receipt: 08-08-2011
 Date of Report: 08-11-2011

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

Location: 145, Black mastic with pebble texture

Lab ID-Version‡: 3612323-1

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

Location: 146, Black mastic with pebble texture

Lab ID-Version‡: 3612324-1

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

Location: 147, White cove with felt

Lab ID-Version‡: 3612325-1

Sample Layers	Asbestos Content
Black Felt With White Surface	ND
Composite Non-Asbestos Fibrous Content:	30% Glass Fibers 10% Cellulose 10% Synthetic Fibers
Sample Composite Homogeneity: Good	

Location: 148, White cove with felt

Lab ID-Version‡: 3612326-1

Sample Layers	Asbestos Content
Black Felt With White Surface	ND
Composite Non-Asbestos Fibrous Content:	30% Glass Fibers 10% Cellulose 10% Synthetic Fibers
Sample Composite Homogeneity: Good	

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Client: Ardent Environmental Group, Inc.
C/O: Mr. Craig Metheny
Re: 100252002; 333 turnbull Cayn Rd.

Date of Sampling: 08-02-2011
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ASBESTOS PLM REPORT: EPA-600/M4-82-020 & EPA METHOD 600/R-93-116**Location: 149, White cove with felt**

Lab ID-Version‡: 3612327-1

Sample Layers	Asbestos Content
Black Felt With White Surface	ND
Composite Non-Asbestos Fibrous Content:	30% Glass Fibers 10% Cellulose 10% Synthetic Fibers
Sample Composite Homogeneity:	Good

Location: 150, Gray mastic

Lab ID-Version‡: 3612328-1

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

Location: 151, Gray mastic

Lab ID-Version‡: 3612329-1

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

Location: 152, Roof pads

Lab ID-Version‡: 3612330-1

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

Location: 153, Roof pads

Lab ID-Version‡: 3612331-1

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

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Client: Ardent Environmental Group, Inc.
C/O: Mr. Craig Metheny
Re: 100252002; 333 turnbull Cayn Rd.Date of Sampling: 08-02-2011
Date of Receipt: 08-08-2011
Date of Report: 08-11-2011**ASBESTOS PLM REPORT: EPA-600/M4-82-020 & EPA METHOD 600/R-93-116****Location: 154, Roof core section B**

Lab ID-Version‡: 3612332-1

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

Location: 155, Roof core section B

Lab ID-Version‡: 3612333-1

Sample Layers	Asbestos Content
Black Roofing Shingle With Gravels	ND
Black Roofing Felt 1	ND
Black Roofing Felt 2	ND
Composite Non-Asbestos Fibrous Content:	40% Glass Fibers 10% Cellulose
Sample Composite Homogeneity:	Moderate

Location: 156, Roof core section B

Lab ID-Version‡: 3612334-1

Sample Layers	Asbestos Content
Black Roofing Shingle With Gravels	ND
Black Roofing Felt 1	ND
Black Roofing Felt 2	ND
Composite Non-Asbestos Fibrous Content:	40% Glass Fibers 10% Cellulose
Sample Composite Homogeneity:	Moderate

Location: 157, Black mastic

Lab ID-Version‡: 3612335-1

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

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Client: Ardent Environmental Group, Inc.
 C/O: Mr. Craig Metheny
 Re: 100252002; 333 turnbull Cayn Rd.

Date of Sampling: 08-02-2011
 Date of Receipt: 08-08-2011
 Date of Report: 08-11-2011

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

Location: 158, Black mastic

Lab ID-Version‡: 3612336-1

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

Location: 159, Black mastic

Lab ID-Version‡: 3612337-1

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

Location: 160, Gray mastic

Lab ID-Version‡: 3612338-1

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

Location: 161, Gray mastic

Lab ID-Version‡: 3612339-1

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

Location: 162, Gray mastic

Lab ID-Version‡: 3612340-1

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

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Client: Ardent Environmental Group, Inc.
 C/O: Mr. Craig Metheny
 Re: 100252002; 333 turnbull Cayn Rd.

Date of Sampling: 08-02-2011
 Date of Receipt: 08-08-2011
 Date of Report: 08-11-2011

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

Location: 163, Gray mastic

Lab ID-Version‡: 3612341-1

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

Location: 164, Gray mastic

Lab ID-Version‡: 3612342-1

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

Location: 165, Gray mastic

Lab ID-Version‡: 3612343-1

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

Location: 166, Gray mastic

Lab ID-Version‡: 3612344-1

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

Location: 167, Roof core section C

Lab ID-Version‡: 3612345-1

Sample Layers	Asbestos Content
Black Roofing Shingle with Gravel	ND
Black Roofing Felt with Tar	ND
Brown Felt	ND
Composite Non-Asbestos Fibrous Content:	40% Glass Fibers 10% Cellulose
Sample Composite Homogeneity:	Moderate

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Client: Ardent Environmental Group, Inc.
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Date of Sampling: 08-02-2011
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ASBESTOS PLM REPORT: EPA-600/M4-82-020 & EPA METHOD 600/R-93-116

Location: 168, Roof core section C

Lab ID-Version‡: 3612346-1

Sample Layers	Asbestos Content
Black Roofing Shingle with Gravel	ND
Black Roofing Felt with Tar	ND
Brown Felt	ND
Composite Non-Asbestos Fibrous Content:	40% Glass Fibers 10% Cellulose
Sample Composite Homogeneity:	Moderate

Location: 169, Roof core section C

Lab ID-Version‡: 3612347-1

Sample Layers	Asbestos Content
Black Roofing Shingle with Gravel	ND
Black Roofing Felt with Tar	ND
Brown Felt	ND
Composite Non-Asbestos Fibrous Content:	40% Glass Fibers 10% Cellulose
Sample Composite Homogeneity:	Moderate

Location: 170, White caulk

Lab ID-Version‡: 3612348-1

Sample Layers	Asbestos Content
White Caulk	ND
Composite Non-Asbestos Fibrous Content:	2% Cellulose
Sample Composite Homogeneity:	Moderate

Location: 171, White caulk

Lab ID-Version‡: 3612349-1

Sample Layers	Asbestos Content
White Caulk	ND
Composite Non-Asbestos Fibrous Content:	2% Cellulose
Sample Composite Homogeneity:	Moderate

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 C/O: Mr. Craig Metheny
 Re: 100252002; 333 turnbull Cayn Rd.

Date of Sampling: 08-02-2011
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ASBESTOS PLM REPORT: EPA-600/M4-82-020 & EPA METHOD 600/R-93-116

Location: 172, White caulk

Lab ID-Version‡: 3612350-1

Sample Layers	Asbestos Content
White Caulk	ND
Composite Non-Asbestos Fibrous Content:	2% Cellulose
Sample Composite Homogeneity:	Moderate

Location: 173, Black mastic with pebble texture

Lab ID-Version‡: 3612351-1

Sample Layers	Asbestos Content
Black Roofing Material with Gravel	ND
Composite Non-Asbestos Fibrous Content:	40% Cellulose
Sample Composite Homogeneity:	Moderate

Location: 174, Black mastic with pebble texture

Lab ID-Version‡: 3612352-1

Sample Layers	Asbestos Content
Black Roofing Material with Gravel	ND
Composite Non-Asbestos Fibrous Content:	40% Cellulose
Sample Composite Homogeneity:	Moderate

Location: 175, Black mastic with pebble texture

Lab ID-Version‡: 3612353-1

Sample Layers	Asbestos Content
Black Roofing Material with Gravel	ND
Composite Non-Asbestos Fibrous Content:	40% Cellulose
Sample Composite Homogeneity:	Moderate

Location: 176, White cove with white mastic

Lab ID-Version‡: 3612354-1

Sample Layers	Asbestos Content
Black/White Semi-Fibrous Material	ND
White Mastic	ND
Composite Non-Asbestos Fibrous Content:	15% Glass Fibers
Sample Composite Homogeneity:	Moderate

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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: 100252002; 333 turnbull Cayn Rd.

Date of Sampling: 08-02-2011
Date of Receipt: 08-08-2011
Date of Report: 08-11-2011

ASBESTOS PLM REPORT: EPA-600/M4-82-020 & EPA METHOD 600/R-93-116**Location: 177, White cove with white mastic**

Lab ID-Version‡: 3612355-1

Sample Layers	Asbestos Content
Black/White Semi-Fibrous Material	ND
White Mastic	ND
Composite Non-Asbestos Fibrous Content:	15% Glass Fibers
Sample Composite Homogeneity:	Moderate

Location: 178, Roof core section D

Lab ID-Version‡: 3612356-1

Sample Layers	Asbestos Content
Black Roofing Shingle with Gravel	ND
Black Roofing Felt with Tar	ND
Black Felt with Silver Paint	ND
Composite Non-Asbestos Fibrous Content:	40% Glass Fibers 10% Cellulose
Sample Composite Homogeneity:	Moderate

Location: 179, Roof core section D

Lab ID-Version‡: 3612357-1

Sample Layers	Asbestos Content
Black Roofing Shingle with Gravel	ND
Black Roofing Felt with Tar	ND
Black Felt with Silver Paint	ND
Composite Non-Asbestos Fibrous Content:	40% Glass Fibers 10% Cellulose
Sample Composite Homogeneity:	Moderate

Location: 180, Black mastic with silver paint

Lab ID-Version‡: 3612358-1

Sample Layers	Asbestos Content
Black Mastic with Silver Paint	ND
Composite Non-Asbestos Fibrous Content:	50% Cellulose
Sample Composite Homogeneity:	Moderate

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Client: Ardent Environmental Group, Inc.
C/O: Mr. Craig Metheny
Re: 100252002; 333 turnbull Cayn Rd.

Date of Sampling: 08-02-2011
Date of Receipt: 08-08-2011
Date of Report: 08-11-2011

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

Location: 181, Black mastic with silver paint

Lab ID-Version‡: 3612359-1

Sample Layers	Asbestos Content
Black Mastic with Silver Paint	ND
Composite Non-Asbestos Fibrous Content:	50% Cellulose
Sample Composite Homogeneity:	Moderate

Location: 182, Black mastic with silver paint

Lab ID-Version‡: 3612360-1

Sample Layers	Asbestos Content
Black Mastic with Silver Paint	ND
Composite Non-Asbestos Fibrous Content:	50% Cellulose
Sample Composite Homogeneity:	Moderate

Location: 183, Dark gray mastic

Lab ID-Version‡: 3612361-1

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

Location: 184, Dark gray mastic

Lab ID-Version‡: 3612362-1

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

Location: 185, Light gray mastic

Lab ID-Version‡: 3612363-1

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

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Client: Ardent Environmental Group, Inc.
C/O: Mr. Craig Metheny
Re: 100252002; 333 turnbull Cayn Rd.Date of Sampling: 08-02-2011
Date of Receipt: 08-08-2011
Date of Report: 08-11-2011**ASBESTOS PLM REPORT: EPA-600/M4-82-020 & EPA METHOD 600/R-93-116****Location: 186, Light gray mastic**

Lab ID-Version‡: 3612364-1

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

Location: 187, Beige stucco

Lab ID-Version‡: 3612365-1

Sample Layers	Asbestos Content
Beige Stucco with White Paint/Texture	ND
Composite Non-Asbestos Fibrous Content:	< 1% Cellulose
Sample Composite Homogeneity:	Moderate

Location: 188, Stucco

Lab ID-Version‡: 3612366-1

Sample Layers	Asbestos Content
Beige Stucco with White Paint/Texture	ND
Composite Non-Asbestos Fibrous Content:	< 1% Cellulose
Sample Composite Homogeneity:	Moderate

Location: 189, Stucco

Lab ID-Version‡: 3612367-1

Sample Layers	Asbestos Content
Beige Stucco with White Paint/Texture	ND
Composite Non-Asbestos Fibrous Content:	< 1% Cellulose
Sample Composite Homogeneity:	Moderate

Location: 190, Black window putty

Lab ID-Version‡: 3612368-1

Sample Layers	Asbestos Content
Black Window Putty	ND
Sample Composite Homogeneity:	Moderate

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Client: Ardent Environmental Group, Inc.
C/O: Mr. Craig Metheny
Re: 100252002; 333 turnbull Cayn Rd.Date of Sampling: 08-02-2011
Date of Receipt: 08-08-2011
Date of Report: 08-11-2011**ASBESTOS PLM REPORT: EPA-600/M4-82-020 & EPA METHOD 600/R-93-116****Location: 191, Black window putty**

Lab ID-Version‡: 3612369-1

Sample Layers	Asbestos Content
Black Window Putty	ND
Sample Composite Homogeneity:	Moderate

Location: 192, Black window putty

Lab ID-Version‡: 3612370-1

Sample Layers	Asbestos Content
Black Window Putty	ND
Sample Composite Homogeneity:	Moderate

Location: 193, Stucco

Lab ID-Version‡: 3612371-1

Sample Layers	Asbestos Content
White Stucco with Gray Paint	ND
Composite Non-Asbestos Fibrous Content:	< 1% Cellulose
Sample Composite Homogeneity:	Moderate

Location: 194, Stucco

Lab ID-Version‡: 3612372-1

Sample Layers	Asbestos Content
White Stucco with Gray Paint	ND
Composite Non-Asbestos Fibrous Content:	< 1% Cellulose
Sample Composite Homogeneity:	Moderate

Location: 195, Stucco

Lab ID-Version‡: 3612373-1

Sample Layers	Asbestos Content
White Stucco with Gray Paint	ND
Composite Non-Asbestos Fibrous Content:	< 1% Cellulose
Sample Composite Homogeneity:	Moderate

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APPENDIX B
CERTIFICATIONS

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

Craig A Metheny

Name

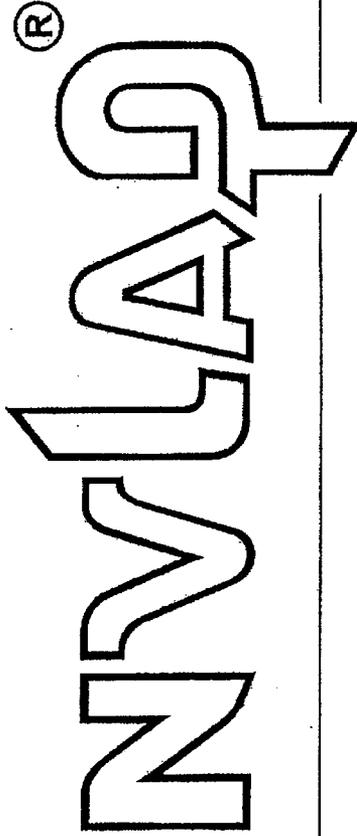


Certification No. 08-4421

Expires on 09/18/11

This certification was issued by the Division of Occupational Safety and Health as authorized by Sections 7160 et seq. of the Business and Professions Code.

United States Department of Commerce
National Institute of Standards and Technology



Certificate of Accreditation to ISO/IEC 17025:2005

NVLAP LAB CODE: 200757-0

EMLab P&K, LLC
Westminster, CA

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

BULK ASBESTOS FIBER ANALYSIS

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

2011-01-01 through 2011-12-31

Effective dates



Dolly S. Buce

For the National Institute of Standards and Technology



**National Voluntary
Laboratory Accreditation Program**



SCOPE OF ACCREDITATION TO ISO/IEC 17025:2005

EMLab P&K, LLC
 Avalon Center
 5555 Garden Grove Blvd. Ste 275
 Westminster, CA 92683
 Mr. Justin Vandenberg
 Phone: 916-374-4390 Fax: 650-742-8162
 E-Mail: jvandenberg@emlabpk.com
 URL: www.emlabpk.com

BULK ASBESTOS FIBER ANALYSIS (PLM)

NVLAP LAB CODE 200757-0

NVLAP Code Designation / Description

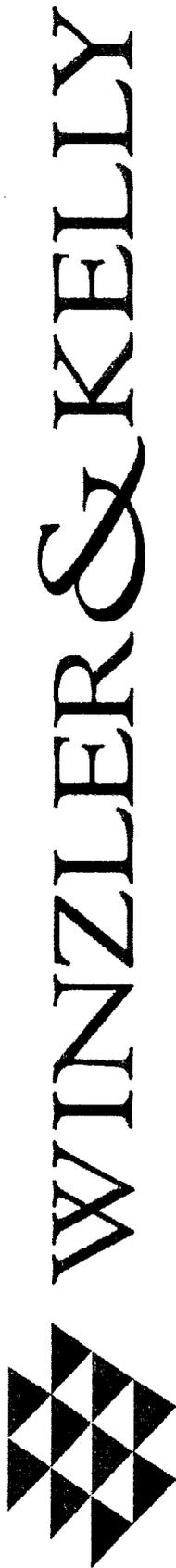
18/A01 EPA-600/M4-82-020: Interim Method for the Determination of Asbestos in Bulk Insulation Samples

2011-01-01 through 2011-12-31

Effective dates

Sally S. Bruce

For the National Institute of Standards and Technology



PRE-DEMOLITION
LEAD TESTING SERVICES REPORT

Project Site:

**Warehouse/Office Building
333 Turnbull Canyon Road
City of Industry, California 91745**

Prepared For:

**Mr. Craig Metheny
Arden 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: 1156011005.77010

July 26, 2011

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APPENDIX B - LEAD TESTING MAP

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APPENDIX D - CDPH LEAD HAZARD EVALUATION REPORT

SECTION I

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 vacant warehouse/office building located at 333 Turnbull Canyon Road in the City of Industry, County of Los Angeles, California.

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

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

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

VACANT WAREHOUSE/OFFICE BUILDING 333 TURNBULL CANYON ROAD 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> Black+White/Metal/Pipe Covering Silver/Metal/Conduit White+Brown/Stucco/Walls and Overhang Ceilings Red/Metal/Bollard Red/Metal/Fire Hydrant Yellow/Metal/Safety Hand Rail Yellow/Metal/I-Beam Column Red/Wood/Fire Ext. Frame	Roof A Roof D Exterior Exterior, Side B Exterior, Side B Interior, Warehouse C Interior, Warehouse A Interior, Warehouse A Mezzanine Level	Intact Intact Fair Intact Intact Fair Intact Intact	16 EA 100 LF 16,000 SF 8 EA 5 EA 20 LF 36 EA @ 30 LF (1,080 LF) 10 SF
<p style="text-align: center;"><small>Note 1 Lead-Containing Surface Coatings Detected: Refer to the XRF Lead Data Table in Appendix C</small></p>			

VACANT WAREHOUSE/OFFICE BUILDING 333 TURNBULL CANYON ROAD 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 building, which may be impacted by the impending demolition activities.

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

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

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

requirements apply. However even where the NEA criteria is met, certain hazard communication training and work practice controls still apply where lead is disturbed.

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

NOTE – “OSHA does not consider any method that relies solely on the analysis of bulk materials or surface content of lead (or other toxic material) to be acceptable for safely predicting employee exposure to airborne 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.

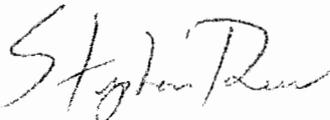
- ◆ **CDPH:** The CDPH has specific requirements (Title 17 Sections 35001 thru 36100 et. al.) for hazard assessment and work in public or residential structures. These regulations require special certifications, work practices, and notification for such activities.
- ◆ **Senate Bill 460 (SB 460):** An 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 CDPH Lead Inspector-Assessor #5809
Registered Environmental Assessor I #08323

Report reviewed and signed for Ardent by:



Jerry R. Sherman, LEED AP
Environmental Service Line Manager

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 vacant warehouse/office building located at 333 Turnbull Canyon Road 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 July 14, 2011 by Mr. Stephen Reese and Mr. Jerry Sherman. Mr. Reese performed report preparation and Mr. Jerry Sherman performed report review. Mr. Reese and Mr. Sherman are California Department of Public Health (CDPH)-Certified Lead-Related Inspectors/Risk Assessors. Mr. Reese is also a CDPH-Certified Lead Project Monitor. All members of the survey team are employees of Winzler & Kelly and have received Hazardous Waste Operations and Emergency Response (HAZWOPER) training in accordance with 8 California Code of Regulations (CCR) 5194. Copies of certifications can be found in Appendix A.

Building Description

The survey and testing was conducted at a vacant warehouse and office building located at 333 Turnbull Canyon Road in the City of Industry, County of Los Angeles, California. The building is approximately 125,000 square feet in size, that consisted of a concrete-frame building with floors finished with vinyl tile, carpet or ceramic tile; interior walls finished with ceramic tile, wallboard (drywall)/joint compound, or base cove; interior ceilings finished with drywall/joint compound; exterior walls finished with concrete and stucco; exterior ceiling overhangs finished with stucco; and roofs consisted of built-up roofing materials.

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

METHODOLOGY

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

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

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

or structural material which contains lead or its compounds in excess of seven-tenths (0.7) of one milligram per square centimeter," the XRF measurement data results were interpreted as follows:

1. Positive results (LBPs/LBSs present) were determined when analytical results revealed a lead concentration of 0.7 milligram per square centimeter (mg/cm^2) or greater.
2. Positive results (LCSCs present) were determined when analytical results revealed a lead concentration of $0.1 \text{ mg}/\text{cm}^2$ 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 234 XRF measurements (with calibration readings) for the determination of lead content were collected from the subject site building on July 14, 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):

333 Turnbull Canyon Road Building

1. Black+White/Metal/Pipe Covering
2. Silver/Metal/Conduit
3. White+Brown/Stucco/Walls and Overhang Ceilings
4. Red/Metal/Bollard
5. Red/Metal/Fire Hydrant
6. Yellow/Metal/Safety Hand Rail
7. Yellow/Metal/I-Beam Column
8. Red/Wood/Fire Ext. Frame

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 building, which may be impacted by the impending demolition activities.

All demolition involving potential and identified lead-containing surfaces should be conducted in accordance with Title 8, California Code of Regulations, Section 1532.1 and 29 CFR 1926.62. In addition, all activities

involving identified lead-based paints must be conducted in accordance with Title 17, California Code of Regulations, Division 1, Chapter 8, Sections 35001 through 36100, which proscribes the use of State of California Department of Public Health (CDPH)-certified workers, work practices, and other requirements.

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

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

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

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

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

lead-related environmental risks in general but cannot be used to calculate worker exposures and are not a substitute for employee exposure monitoring.

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

- ◆ Any welding, cutting or heating of metal surfaces containing surface coatings should be conducted in accordance with 29 CFR 1926.354 and 8 CCR 1537. These regulations require surfaces covered with toxic preservatives, and in enclosed areas, be stripped of all toxic coatings for a distance of at least 4 inches, in all directions, from the area of heat application prior to the initiation of such heat application.
- ◆ **Cal/EPA** through the Division of Toxic Substance Control (DTSC) regulates disposal of lead hazardous waste (Title 22 Division 4.5, Environmental Health Standards for the Management of Hazardous Waste). DTSC has issued guidance indicating that architectural debris with intact lead paint is normally expected to be handled as general construction waste. However, waste stream segregation and analysis is still required for all paint or coating debris regardless of if the paint or coating is intact on a building component or not. The resulting wastes may be hazardous under California and federal RCRA standards for lead and therefore require proper handling, packaging, labeling, and transportation under a proper manifest to a permitted hazardous waste storage, treatment and disposal facility.
- ◆ **CDPH:** The CDPH has specific requirements (Title 17 Sections 35001 thru 36100 et. al.) for hazard assessment and work in public or residential structures. These regulations require special certifications, work practices, and notification for such activities.
- ◆ **Senate Bill 460 (SB 460):** An act to amend Section 1941.1 of the Civil Code, and to amend Sections 17961, 17980, and 124130 of, and to add Sections 17920.10, 105251, 105252, 105253, 105254, 105255, 105256, and 105257 to, the Health and Safety Code, relating to lead abatement. This bill allows for fines and criminal penalties to be levied on any person who is found to have performed lead abatement without containment or created a measurable lead hazard based upon current CDPH standards. The testing for this determination can be initiated by any local or state building inspector, health department inspector, or other designated state or local official. A determination of a lead hazard is not solely based upon the lead content of the paint or coating and can be the result of the disturbance of such materials with low concentrations of lead.

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

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

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

APPENDIX A
CERTIFICATIONS

State of California Department of Public Health

Lead-Related
Construction
Certificate

Certificate
Type

Expiration
Date

Inspector/Assessor	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	Contract Type	Expiration Date
	Inspector/Assessor	01/07/2012

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



Jerry R. Sherman ID #: **5809**

APPENDIX B

LEAD TESTING MAP

WINZLER AND KELCY
LEAD TESTING MAP

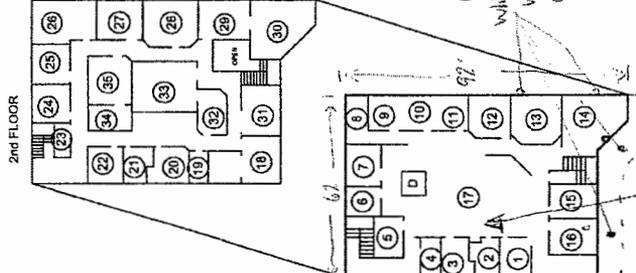
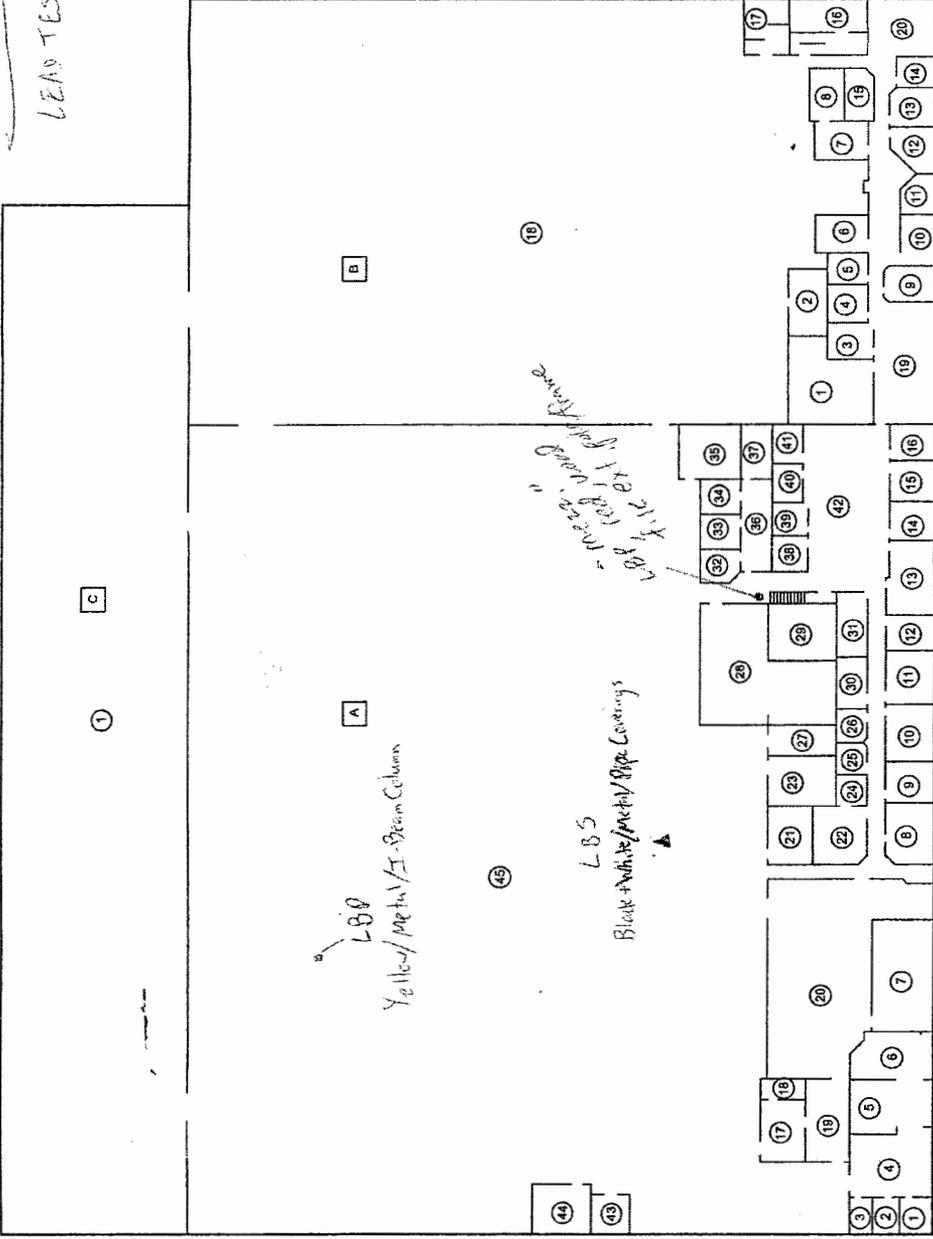
Side C

LBP
Red/metal/Black
LBP
Red/metal/White Hydrant

LBP
Yellow/metal/Safety Seal

Side B

PROCTOR AVENUE



LEGEND

- A BUILDING SECTION
- 1 ROOM NUMBER

Side A - Lead Testing Orientation
 Side B - Lead Testing Orientation
 Side C - Lead Testing Orientation
 Positive XRF Reading location
 A Positive XRF Reading on Roof location

3800
 LBP - Lead Based Paint
 LBP - Lead Based Paint
 LBP - Lead Based Paint



NOTE: ALL DIMENSIONS, DIRECTIONS AND LOCATIONS ARE APPROXIMATE

TURNBULL CANYON ROAD
 LBP
 Silver/metal/Ceramic

FLOOR PLAN

PROJECT NO
115601005

DATE
7/2011

333 TURNBULL CANYON ROAD
 CITY OF INDUSTRY, CALIFORNIA

FIGURE

1

APPENDIX C

XRF LEAD DATA TABLE

XRF LEAD DATA TABLE

333 TURNBULL CANYON RD., CITY OF INDUSTRY, CA

READING NO.	TESTING DATE	COLOR	SUBSTRATE	COMPONENT	CONDITION	SIDE	ROOM	FLOOR	MISC	RESULTS	LEAD (mc/cm ²)
1	7/14/2011				SHUTTER CALIBRATION						2.92
2	7/14/2011				CALIBRATE					Positive	1.1
3	7/14/2011				CALIBRATE					Positive	1.1
4	7/14/2011				CALIBRATE					Positive	1.1
5	7/14/2011	WHITE	METAL	AIR VENT	POOR	0	ROOF A	ROOF	EXTERIOR	Negative	0.01
6	7/14/2011	WHITE	METAL	CONDUIT	POOR	0	ROOF A	ROOF	EXTERIOR	Negative	0.09
7	7/14/2011	BLACK	METAL	PIPE COVERING	INTACT	0	ROOF A	ROOF	EXTERIOR	LBS	45.5
8	7/14/2011	WHITE	METAL	PIPE COVERING	INTACT	0	ROOF A	ROOF	EXTERIOR	LBS	37.2
9	7/14/2011	BEIGE	METAL	AC UNIT	INTACT	0	ROOF A	ROOF	EXTERIOR	Negative	0
10	7/14/2011	WHITE	METAL	AC UNIT LWR TRIM	INTACT	0	ROOF A	ROOF	EXTERIOR	Negative	0
11	7/14/2011	WHITE	PLASTIC	PARAPET	INTACT	A	ROOF A	ROOF	EXTERIOR	Negative	0
12	7/14/2011	BROWN	METAL	EDGE CAP	INTACT	A	ROOF A	ROOF	EXTERIOR	Negative	0.01
13	7/14/2011	BROWN	METAL	EDGE CAP	INTACT	A	ROOF A	ROOF	EXTERIOR	Negative	0
14	7/14/2011	TAN	METAL	EDGE CAP	INTACT	A	ROOF A	ROOF	EXTERIOR	Negative	0
15	7/14/2011	TAN	METAL	EDGE CAP	INTACT	A	ROOF A	ROOF	EXTERIOR	Negative	0
16	7/14/2011	TAN	CONCRETE	WALL	INTACT	A	ROOF D	ROOF	EXTERIOR	Negative	0.03
17	7/14/2011	BROWN	CONCRETE	WALL	INTACT	A	ROOF D	ROOF	EXTERIOR	Null	0.05
18	7/14/2011	BROWN	CONCRETE	WALL	INTACT	A	ROOF D	ROOF	EXTERIOR	Null	0.01
19	7/14/2011	BROWN	CONCRETE	WALL	INTACT	A	ROOF D	ROOF	EXTERIOR	Null	0.01
20	7/14/2011	BROWN	CONCRETE	WALL	INTACT	A	ROOF D	ROOF	EXTERIOR	Negative	0.02
21	7/14/2011	BROWN	METAL	EDGE CAP	INTACT	C	ROOF A	ROOF	EXTERIOR	Negative	0
22	7/14/2011	TAN	METAL	EDGE CAP	INTACT	C	ROOF A	ROOF	EXTERIOR	Negative	0
23	7/14/2011	BEIGE	METAL	AC UNIT	INTACT	0	ROOF B	ROOF	EXTERIOR	Negative	0
24	7/14/2011	WHITE	METAL	AIR VENT	INTACT	0	ROOF B	ROOF	EXTERIOR	Negative	0
25	7/14/2011	WHITE	METAL	E BOX	POOR	0	ROOF B	ROOF	EXTERIOR	Negative	0
26	7/14/2011	WHITE	STUCCO	WALL	INTACT	B	ROOF D	ROOF	EXTERIOR	Null	0.01
27	7/14/2011	WHITE	STUCCO	WALL	INTACT	B	ROOF D	ROOF	EXTERIOR	Null	0
28	7/14/2011	WHITE	STUCCO	WALL	INTACT	B	ROOF D	ROOF	EXTERIOR	Negative	0
29	7/14/2011	WHITE	METAL	EDGE CAP	INTACT	B	ROOF D	ROOF	EXTERIOR	Negative	0
30	7/14/2011	SILVER	METAL	ROOF HATCH	INTACT	0	ROOF D	ROOF	EXTERIOR	Negative	0
31	7/14/2011	SILVER	METAL	ROOF	INTACT	0	ROOF D	ROOF	EXTERIOR	Negative	0
32	7/14/2011	SILVER	METAL	EDGE CAP	INTACT	A	ROOF D	ROOF	EXTERIOR	Negative	0.01
33	7/14/2011	SILVER	METAL	AIR DUCT	INTACT	0	ROOF D	ROOF	EXTERIOR	Negative	0
34	7/14/2011	SILVER	METAL	CONDUIT	INTACT	0	ROOF D	ROOF	EXTERIOR	LBP	7.8
35	7/14/2011	SILVER	METAL	PIPE	INTACT	0	ROOF D	ROOF	EXTERIOR	Negative	0
36	7/14/2011	GREEN	METAL	LADDER	INTACT	B	ROOF B	ROOF	EXTERIOR	Negative	0.03
37	7/14/2011	BEIGE	METAL	ROOF HATCH	POOR	0	ROOF A	ROOF	EXTERIOR	LCSC	0.4
38	7/14/2011	BEIGE	METAL	SWAMP COOLER	FAIR	0	ROOF A	ROOF	EXTERIOR	Negative	0
39	7/14/2011	WHITE	STUCCO	WALL	INTACT	A	ROOF A	ROOF	EXTERIOR	Negative	0
40	7/14/2011	BROWN	STUCCO	WALL	INTACT	A	ROOF A	ROOF	EXTERIOR	Negative	0.01
41	7/14/2011	BLACK	METAL	HAND RAIL	INTACT	A	ROOF A	ROOF	EXTERIOR	Null	0.18
42	7/14/2011	BLACK	METAL	HAND RAIL	INTACT	A	ROOF A	ROOF	EXTERIOR	Negative	0.06
43	7/14/2011	WHITE	METAL	RAIN GUTTER	INTACT	A	ROOF A	ROOF	EXTERIOR	Negative	-0.26
44	7/14/2011	BROWN	METAL	RAIN GUTTER	INTACT	A	ROOF A	ROOF	EXTERIOR	Negative	-0.15
45	7/14/2011	WHITE	STUCCO	CEILING	INTACT	A	ROOF A	ROOF	EXTERIOR	LBP	1.5
46	7/14/2011	WHITE	STUCCO	WALL	INTACT	A	ROOF A	ROOF	EXTERIOR	Null	0
47	7/14/2011	WHITE	STUCCO	WALL	INTACT	A	ROOF A	ROOF	EXTERIOR	Negative	0
48	7/14/2011	BLUE	METAL	ROOF	INTACT	0	OVERHANG	ROOF	EXTERIOR	Null	0
49	7/14/2011	BLUE	METAL	ROOF	INTACT	0	OVERHANG	ROOF	EXTERIOR	Negative	0

333 TURNBULL CANYON RD., CITY OF INDUSTRY, CA											
READING NO.	TESTING DATE	COLOR	SUBSTRATE	COMPONENT	CONDITION	SIDE	ROOM	FLOOR	MISC	RESULTS	LEAD (mg/cm ²)
50	7/14/2011	BLUE	METAL	ROOF	INTACT	0	OVERHANG	ROOF	EXTERIOR	Null	0.01
51	7/14/2011	BLUE	METAL	ROOF	INTACT	0	OVERHANG	ROOF	EXTERIOR	Null	0.01
52	7/14/2011	BLUE	METAL	ROOF	INTACT	0	OVERHANG	ROOF	EXTERIOR	Negative	0
53	7/14/2011	WHITE	STUCCO	CEILING	INTACT	0	OVERHANG		EXTERIOR	Null	0
54	7/14/2011	WHITE	STUCCO	CEILING	FAIR	0	OVERHANG		EXTERIOR	LBP	1.2
55	7/14/2011	BLACK	METAL	FENCE	INTACT	A			EXTERIOR	Negative	0
56	7/14/2011	WHITE	STUCCO	WALL	INTACT	D			EXTERIOR	Null	0
57	7/14/2011	WHITE	STUCCO	WALL	INTACT	D			EXTERIOR	LBP	1.1
58	7/14/2011	BROWN	STUCCO	WALL	INTACT	D			EXTERIOR	Negative	0.01
59	7/14/2011	BROWN	STUCCO	WALL	FAIR	D			EXTERIOR	LBP	1.3
60	7/14/2011	BLACK	METAL	HAND RAIL	INTACT	D			EXTERIOR	Negative	0
61	7/14/2011	BROWN	METAL	RAIN GUTTER	INTACT	D			EXTERIOR	Negative	0.02
62	7/14/2011	BLACK	METAL	WINDOW FRAME	INTACT	C			EXTERIOR	LCSC	0.4
63	7/14/2011	SILVER	METAL	DOOR	INTACT	C			EXTERIOR	Negative	0
64	7/14/2011	SILVER	METAL	DOOR FRAME	INTACT	C			EXTERIOR	Negative	0
65	7/14/2011	BLACK	METAL	WATER PIPE	INTACT	C			EXTERIOR	Negative	0
66	7/14/2011	WHITE	CONCRETE	ROLLUP DOOR FRAME	INTACT	C			EXTERIOR	Negative	0.04
67	7/14/2011	GRAY	METAL	ROLLUP DOOR	INTACT	C			EXTERIOR	Negative	0
68	7/14/2011	WHITE	METAL	CONDUIT	INTACT	C			EXTERIOR	Null	0.2
69	7/14/2011	WHITE	METAL	CONDUIT	INTACT	C			EXTERIOR	Negative	-0.04
70	7/14/2011	WHITE	CONCRETE	WALL	INTACT	C			EXTERIOR	Negative	0.01
71	7/14/2011	BROWN	CONCRETE	WALL	INTACT	C			EXTERIOR	Negative	0
72	7/14/2011	TAN	CONCRETE	WALL	INTACT	B			EXTERIOR	Null	0.01
73	7/14/2011	TAN	CONCRETE	WALL	INTACT	B			EXTERIOR	Negative	0
74	7/14/2011	GRAY	CONCRETE	FLOOR	INTACT	B			EXTERIOR	Negative	0.01
75	7/14/2011	BROWN	METAL	CONDUIT	INTACT	B			EXTERIOR	Null	0
76	7/14/2011	BROWN	METAL	CONDUIT	INTACT	B			EXTERIOR	Negative	0
77	7/14/2011	SILVER	METAL	CEILING	INTACT	D	OVERHANG		EXTERIOR	LCSC	0.18
78	7/14/2011	SILVER	METAL	CEILING	INTACT	D	OVERHANG		EXTERIOR	LCSC	0.16
79	7/14/2011	SILVER	METAL	BEAM	INTACT	D	OVERHANG		EXTERIOR	Negative	0.09
80	7/14/2011	SILVER	METAL	BEAM	INTACT	D	OVERHANG		EXTERIOR	LCSC	0.3
81	7/14/2011	SILVER	METAL	CONDUIT	INTACT	D	OVERHANG		EXTERIOR	Negative	0
82	7/14/2011	SILVER	METAL	PIPE	INTACT	D	OVERHANG		EXTERIOR	Negative	0.06
83	7/14/2011	WHITE	METAL	RAIN GUTTER	INTACT	D	OVERHANG		EXTERIOR	Negative	0
84	7/14/2011	SILVER	METAL	DOOR	INTACT	D	OVERHANG		EXTERIOR	Negative	0
85	7/14/2011	SILVER	METAL	DOOR FRAME	INTACT	D			EXTERIOR	LCSC	0.25
86	7/14/2011	SILVER	METAL	UPPER TRIM	INTACT	D			EXTERIOR	Negative	0
87	7/14/2011	YELLOW	METAL	ROLLUP DOOR TRIM	POOR	D			EXTERIOR	Negative	0
88	7/14/2011	YELLOW	METAL	ROLLUP DOOR STEPS	INTACT	D			EXTERIOR	Negative	-0.02
89	7/14/2011	YELLOW	METAL	ROLLUP DOOR HANDLE	INTACT	D			EXTERIOR	Negative	-0.06
90	7/14/2011	BLACK	METAL	ROLLUP DOOR HANDLE	INTACT	D			EXTERIOR	Negative	0.02
91	7/14/2011	GRAY	METAL	ROLLUP DOOR	INTACT	D			EXTERIOR	Negative	0
92	7/14/2011	WHITE	METAL	CEILING	INTACT	D	OVERHANG		EXTERIOR	Negative	0.03
93	7/14/2011	WHITE	METAL	BEAM	INTACT	D	OVERHANG		EXTERIOR	LCSC	0.4
94	7/14/2011	YELLOW	METAL	ROLLUP DOOR FRAME	POOR	D			EXTERIOR	Negative	0.03
95	7/14/2011	YELLOW	METAL	ROLLUP DOOR FRAME	POOR	D			EXTERIOR	Negative	0.01
96	7/14/2011	BROWN	CONCRETE	WALL	INTACT	C			EXTERIOR	Negative	0
97	7/14/2011	TAN	CONCRETE	WALL	INTACT	C			EXTERIOR	Negative	0
98	7/14/2011	WHITE	CONCRETE	WALL	INTACT	C			EXTERIOR	Negative	0.01

333 TURNBULL CANYON RD., CITY OF INDUSTRY, CA											
READING NO.	TESTING DATE	COLOR	SUBSTRATE	COMPONENT	CONDITION	SIDE	ROOM	FLOOR	MISC	RESULTS	LEAD (mg/cm ²)
99	7/14/2011	WHITE	METAL	RAIN GUTTER	INTACT	C			EXTERIOR	Negative	0
100	7/14/2011	GRAY	METAL	DOOR	INTACT	C			EXTERIOR	Negative	0
101	7/14/2011	GRAY	METAL	DOOR FRAME	INTACT	C			EXTERIOR	Negative	0
102	7/14/2011	YELLOW	METAL	PIPE	INTACT	C			EXTERIOR	Negative	0.01
103	7/14/2011	BLUE	CONCRETE	PARKING STOP	POOR	C			EXTERIOR	Negative	0.02
104	7/14/2011	RED	METAL	BOLLARD	INTACT	B			EXTERIOR	LBP	3.5
105	7/14/2011	RED	METAL	FIRE HYDRANT	INTACT	B			EXTERIOR	LBP	2.1
106	7/14/2011	WHITE	CONCRETE	WALL	INTACT	B			EXTERIOR	Null	0.03
107	7/14/2011	WHITE	CONCRETE	WALL	INTACT	B			EXTERIOR	Negative	0
108	7/14/2011	BROWN	CONCRETE	WALL	INTACT	B			EXTERIOR	Negative	0
109	7/14/2011	TAN	CONCRETE	WALL	INTACT	B			EXTERIOR	Negative	0
110	7/14/2011	BROWN	METAL	PIPE WATER	INTACT	B			EXTERIOR	Negative	0.02
111	7/14/2011	WHITE	METAL	PIPE WATER	INTACT	B			EXTERIOR	LCSC	0.14
112	7/14/2011	BROWN	CONCRETE	STAIRS	INTACT	B			EXTERIOR	Null	0.01
113	7/14/2011	BROWN	CONCRETE	STAIRS	INTACT	B			EXTERIOR	Negative	0
114	7/14/2011	BLACK	METAL	HAND RAIL	INTACT	B			EXTERIOR	LCSC	0.12
115	7/14/2011	BROWN	METAL	AIR DUCT	INTACT	B			EXTERIOR	Negative	0
116	7/14/2011	BROWN	METAL	E BOX	INTACT	B			EXTERIOR	Negative	0
117	7/14/2011	BLACK	METAL	WINDOW FRAME	INTACT	A			EXTERIOR	Negative	0.01
118	7/14/2011	BLACK	METAL	DOOR	INTACT	A			EXTERIOR	Negative	0
119	7/14/2011	GRAY	METAL	DOOR FRAME	INTACT	A			EXTERIOR	Negative	0
120	7/14/2011	YELLOW	METAL	COLUMN POLE	INTACT	0	WAREHOUSE B		INTERIOR	Negative	0.06
121	7/14/2011	YELLOW	METAL	COLUMN POLE	INTACT	0	WAREHOUSE B		INTERIOR	LCSC	0.17
122	7/14/2011	GREEN	METAL	LADDER	INTACT	A	WAREHOUSE B		INTERIOR	Negative	0.07
123	7/14/2011	WHITE	CONCRETE	WALL	INTACT	D	WAREHOUSE B		INTERIOR	Negative	0.02
124	7/14/2011	WHITE	METAL	PIPE	INTACT	D	WAREHOUSE B		INTERIOR	LCSC	0.11
125	7/14/2011	GRAY	METAL	ROLLUP DOOR	INTACT	D	WAREHOUSE B		INTERIOR	Negative	0.02
126	7/14/2011	GRAY	METAL	ROLLUP DOOR FRAME	INTACT	D	WAREHOUSE B		INTERIOR	Negative	0.02
127	7/14/2011	GREEN	METAL	E BOX	INTACT	D	WAREHOUSE B		INTERIOR	Negative	0.01
128	7/14/2011	GREEN	METAL	TRANSFORMER	INTACT	D	WAREHOUSE B		INTERIOR	Negative	0.01
129	7/14/2011	YELLOW	CONCRETE	FLOOR STRIPE	INTACT	0	WAREHOUSE B		INTERIOR	Negative	0.01
130	7/14/2011	WHITE	METAL	CONDUIT	FAIR	D	WAREHOUSE B		INTERIOR	Negative	0.08
131	7/14/2011	YELLOW	METAL	COLUMN POLE	FAIR	0	WAREHOUSE B		INTERIOR	Negative	0.06
132	7/14/2011	RED	CONCRETE	FLOOR STRIPE	FAIR	0	WAREHOUSE B		INTERIOR	Negative	0.01
133	7/14/2011	RED	METAL	FIRE EQUIP	INTACT	0	WAREHOUSE B		INTERIOR	Negative	0
134	7/14/2011	WHITE	CONCRETE	WALL	FAIR	A	WAREHOUSE C		INTERIOR	Negative	0.01
135	7/14/2011	WHITE	CONCRETE	WALL	INTACT	C	WAREHOUSE C		INTERIOR	Negative	0.01
136	7/14/2011	WHITE	METAL	COLUMN	INTACT	A	WAREHOUSE C		INTERIOR	Negative	0.01
137	7/14/2011	WHITE	METAL	DOOR	INTACT	A	WAREHOUSE C		INTERIOR	LCSC	0.2
138	7/14/2011	WHITE	METAL	DOOR FRAME	INTACT	A	WAREHOUSE C		INTERIOR	LCSC	0.13
139	7/14/2011	YELLOW	METAL	COLUMN I BEAM	INTACT	0	WAREHOUSE C		INTERIOR	LCSC	0.22
140	7/14/2011	YELLOW	METAL	HAND RAIL	FAIR	A	WAREHOUSE C		INTERIOR	LBP	2.8
141	7/14/2011	GRAY	CONCRETE	FLOOR	POOR	0	WAREHOUSE C		INTERIOR	Negative	0.01
142	7/14/2011	GRAY	CONCRETE	FLOOR	POOR	0	WAREHOUSE C		INTERIOR	Negative	0.01
143	7/14/2011	GREEN	METAL	E BOX	INTACT	A	WAREHOUSE C		INTERIOR	Negative	0
144	7/14/2011	WHITE	CONCRETE	WALL	INTACT	A	WAREHOUSE A		INTERIOR	Negative	0.03
145	7/14/2011	WHITE	METAL	COLUMN	INTACT	B	WAREHOUSE A		INTERIOR	Negative	0.08
146	7/14/2011	WHITE	CONCRETE	WALL	INTACT	B	WAREHOUSE A		INTERIOR	Negative	0.06
147	7/14/2011	YELLOW	CONCRETE	FLOOR STRIPE	INTACT	0	WAREHOUSE A		INTERIOR	Negative	0.01

333 TURNBULL CANYON RD., CITY OF INDUSTRY, CA

READING NO.	TESTING DATE	COLOR	SUBSTRATE	COMPONENT	CONDITION	SIDE	ROOM	FLOOR	MISC	RESULTS	LEAD (mg/cm ²)
148	7/14/2011	YELLOW	METAL	COLUMN	INTACT	0	WAREHOUSE A		INTERIOR	LCSC	0.6
149	7/14/2011	YELLOW	METAL	I-BEAM COLUMN	INTACT	0	WAREHOUSE A		INTERIOR	LBP	0.9
150	7/14/2011	WHITE	DRYWALL	WALL	INTACT	B	RM 44	WAREHOUSE A	INTERIOR	LCSC	0.2
151	7/14/2011	WHITE	METAL	COLUMN	INTACT	0	RM 44	WAREHOUSE A	INTERIOR	LCSC	0.11
152	7/14/2011	WHITE	METAL	COLUMN	INTACT	0	RM 44	WAREHOUSE A	INTERIOR	LCSC	0.13
153	7/14/2011	WHITE	PORCELAIN	URNAL	INTACT	D	RM 44	WAREHOUSE A	INTERIOR	Negative	0.03
154	7/14/2011	WHITE	PORCELAIN	TOILET	INTACT	D	RM 44	WAREHOUSE A	INTERIOR	Negative	-0.16
155	7/14/2011	WHITE	PORCELAIN	WALL STALL	INTACT	C	RM 44	WAREHOUSE A	INTERIOR	LCSC	0.23
156	7/14/2011	WHITE	WOOD	DOOR	INTACT	D	RM 44	WAREHOUSE A	INTERIOR	Negative	0
157	7/14/2011	WHITE	WOOD	DOOR FRAME	INTACT	D	RM 44	WAREHOUSE A	INTERIOR	LCSC	0.13
158	7/14/2011	WHITE	METAL	DOOR	INTACT	D	RM 43	WAREHOUSE A	INTERIOR	LCSC	0.1
159	7/14/2011	GREEN	METAL	DOOR	INTACT	D	RM 43	WAREHOUSE A	INTERIOR	LCSC	0.1
160	7/14/2011	GREEN	METAL	DOOR JAMB	INTACT	D	RM 43	WAREHOUSE A	INTERIOR	LCSC	0.26
161	7/14/2011	WHITE	DRYWALL	CEILING	INTACT	0	RM 43	WAREHOUSE A	INTERIOR	Negative	0.02
162	7/14/2011	WHITE	DRYWALL	WALL	INTACT	D	RM 43	WAREHOUSE A	INTERIOR	LCSC	0.1
163	7/14/2011	WHITE	DRYWALL	WALL	INTACT	D	RM 43	WAREHOUSE A	INTERIOR	Negative	0.06
164	7/14/2011	GRAY	METAL	E PANEL	INTACT	B	RM 43	WAREHOUSE A	INTERIOR	LCSC	0.3
165	7/14/2011	RED	METAL	STAIRS RAIL	INTACT	0		WAREHOUSE A	INTERIOR	Negative	0
166	7/14/2011	WHITE	WOOD	STAIRS	INTACT	0		WAREHOUSE A	INTERIOR	LCSC	0.15
167	7/14/2011	WHITE	WOOD	STAIRS RAIL	INTACT	0		WAREHOUSE A	INTERIOR	Negative	0
168	7/14/2011	WHITE	WOOD	FRAME	INTACT	C	WAREHOUSE A	MEZZ	INTERIOR	Negative	0
169	7/14/2011	WHITE	WOOD	FRAME	INTACT	C	WAREHOUSE A	MEZZ	INTERIOR	Negative	0.01
170	7/14/2011	WHITE	WOOD	WALL	INTACT	A	WAREHOUSE A	MEZZ	INTERIOR	Negative	0
171	7/14/2011	WHITE	WOOD	DOOR	INTACT	A	WAREHOUSE A	MEZZ	INTERIOR	Negative	0.01
172	7/14/2011	WHITE	WOOD	DOOR JAMB	INTACT	A	WAREHOUSE A	MEZZ	INTERIOR	Negative	0
173	7/14/2011	GREEN	METAL	LADDER	INTACT	A	WAREHOUSE A	MEZZ	INTERIOR	Negative	0.01
174	7/14/2011	GRAY	METAL	FRAME	INTACT	0	WAREHOUSE A	MEZZ	INTERIOR	Negative	0
175	7/14/2011	RED	WOOD	FRAME (FIRE EXT.)	INTACT	0	WAREHOUSE A	MEZZ	INTERIOR	LBP	1.1
176	7/14/2011	RED	METAL	CONDUIT	INTACT	0	WAREHOUSE A	MEZZ	INTERIOR	Negative	0.02
177	7/14/2011	WHITE	METAL	HAND RAIL	INTACT	0	WAREHOUSE A	MEZZ	INTERIOR	Negative	0.06
178	7/14/2011	RED	METAL	E BOX	INTACT	A	WAREHOUSE A	MEZZ	INTERIOR	Negative	0
179	7/14/2011	WHITE	CONCRETE	FLOOR	FAIR	0	4	WAREHOUSE A	INTERIOR	Negative	0
180	7/14/2011	WHITE	CONCRETE	WALL	INTACT	A	4	WAREHOUSE A	INTERIOR	Negative	0.07
181	7/14/2011	WHITE	DRYWALL	WALL	INTACT	B	4	WAREHOUSE A	INTERIOR	Negative	0.01
182	7/14/2011	WHITE	WOOD	CABINET	INTACT	B	1	WAREHOUSE A	INTERIOR	Negative	0
183	7/14/2011	WHITE	METAL	DOOR	INTACT	A	1	WAREHOUSE A	INTERIOR	LCSC	0.16
184	7/14/2011	WHITE	METAL	DOOR JAMB	INTACT	A	1	WAREHOUSE A	INTERIOR	LCSC	0.16
185	7/14/2011	GREEN	CONCRETE	WALL	FAIR	B	1	WAREHOUSE A	INTERIOR	LCSC	0.12
186	7/14/2011	GREEN	METAL	PIPE	FAIR	B	1	WAREHOUSE A	INTERIOR	Negative	0.06
187	7/14/2011	WHITE	WOOD	CABINET	INTACT	D	4	WAREHOUSE A	INTERIOR	Negative	0
188	7/14/2011	WHITE	DRYWALL	WALL	INTACT	D	4	WAREHOUSE A	INTERIOR	Negative	0.01
189	7/14/2011	WHITE	DRYWALL	WALL	INTACT	D	4	WAREHOUSE A	INTERIOR	Negative	0
190	7/14/2011	GRAY	METAL	DOOR	INTACT	A	6	WAREHOUSE A	INTERIOR	Negative	0
191	7/14/2011	WHITE	DRYWALL	WALL	POOR	A	6	WAREHOUSE A	INTERIOR	Negative	0
192	7/14/2011	BLACK	DRYWALL	WINDOW FRAME	INTACT	A	6	WAREHOUSE A	INTERIOR	Negative	0
193	7/14/2011	GRAY	CERAMIC	FLOOR	INTACT	0	HALLWAY	WAREHOUSE A	INTERIOR	Negative	0.04
194	7/14/2011	GRAY	DRYWALL	WALL	INTACT	B	HALLWAY	WAREHOUSE A	INTERIOR	Negative	0
195	7/14/2011	WHITE	WOOD	DOOR	INTACT	C	HALLWAY	WAREHOUSE A	INTERIOR	Negative	0
196	7/14/2011	BLACK	WOOD	COUNTER	INTACT	D	24	WAREHOUSE A	INTERIOR	Negative	0

333 TURNBULL CANYON RD., CITY OF INDUSTRY, CA												
READING NO.	TESTING DATE	COLOR	SUBSTRATE	COMPONENT	CONDITION	SIDE	ROOM	FLOOR	MISC	RESULTS	LEAD (mcl/cm ²)	
197	7/14/2011	WHITE	WOOD	CABINET	INTACT	D	24	WAREHOUSE A	INTERIOR	Negative	0	
198	7/14/2011	WHITE	WOOD	DOOR	INTACT	A	HALLWAY	WAREHOUSE A	INTERIOR	Negative	0	
199	7/14/2011	BLACK	METAL	DOOR JAMB	INTACT	A	HALLWAY	WAREHOUSE A	INTERIOR	Negative	0	
200	7/14/2011	BEIGE	CERAMIC	WALL	INTACT	B	25	WAREHOUSE A	INTERIOR	Negative	0.01	
201	7/14/2011	BLUE	CERAMIC	WALL	INTACT	B	25	WAREHOUSE A	INTERIOR	Negative	0.01	
202	7/14/2011	BLUE	CERAMIC	FLOOR	INTACT	B	25	WAREHOUSE A	INTERIOR	Null	0	
203	7/14/2011	BLUE	CERAMIC	FLOOR	INTACT	B	25	WAREHOUSE A	INTERIOR	Negative	0	
204	7/14/2011	WHITE	PORCELAIN	URNAL	INTACT	D	25	WAREHOUSE A	INTERIOR	Negative	0.05	
205	7/14/2011	WHITE	PORCELAIN	COUNTER	INTACT	D	25	WAREHOUSE A	INTERIOR	Negative	0	
206	7/14/2011	WHITE	DRYWALL	CEILING	INTACT	0	25	WAREHOUSE A	INTERIOR	Negative	0	
207	7/14/2011	WHITE	DRYWALL	WALL	INTACT	A	25	WAREHOUSE A	INTERIOR	Negative	0	
208	7/14/2011	WHITE	PORCELAIN	TOILET	INTACT	C	25	WAREHOUSE A	INTERIOR	Negative	0	
209	7/14/2011	BEIGE	CERAMIC	WALL	INTACT	D	26	WAREHOUSE A	INTERIOR	Negative	0.01	
210	7/14/2011	BLUE	CERAMIC	WALL	INTACT	D	26	WAREHOUSE A	INTERIOR	Negative	0.01	
211	7/14/2011	PINK	CERAMIC	WALL	INTACT	D	26	WAREHOUSE A	INTERIOR	Negative	0.03	
212	7/14/2011	GRAY	CERAMIC	FLOOR	INTACT	D	26	WAREHOUSE A	INTERIOR	Negative	0.01	
213	7/14/2011	GOLD	DRYWALL	WALL	INTACT	A	HALL	WAREHOUSE A	INTERIOR	Negative	0	
214	7/14/2011	BROWN	METAL	DOOR	INTACT	C	HALL	WAREHOUSE A	INTERIOR	Negative	0	
215	7/14/2011	GREEN	DRYWALL	WALL	INTACT	B	13	WAREHOUSE A	INTERIOR	Negative	0.01	
216	7/14/2011	GREEN	CONCRETE	WALL	INTACT	A	13	WAREHOUSE A	INTERIOR	Negative	0.05	
217	7/14/2011	WHITE	WOOD	TRIM	INTACT	A	13	WAREHOUSE A	INTERIOR	Negative	0	
218	7/14/2011	GOLD	CONCRETE	WALL	INTACT	D	42	WAREHOUSE A	INTERIOR	Null	1.1	
219	7/14/2011	GOLD	CONCRETE	WALL	INTACT	D	42	WAREHOUSE A	INTERIOR	Null	0	
220	7/14/2011	GOLD	CONCRETE	WALL	INTACT	D	42	WAREHOUSE A	INTERIOR	Negative	0	
221	7/14/2011	OFFWHITE	DRYWALL	WALL	INTACT	B	10	WAREHOUSE B	INTERIOR	Negative	0	
222	7/14/2011	OFFWHITE	CONCRETE	WALL	INTACT	A	10	WAREHOUSE B	INTERIOR	Negative	0.01	
223	7/14/2011	GRAY	WOOD	DOOR	INTACT	C	10	WAREHOUSE B	INTERIOR	Negative	0	
224	7/14/2011	BLACK	METAL	DOOR FRAME	INTACT	C	10	WAREHOUSE B	INTERIOR	Negative	0	
225	7/14/2011	BLACK	METAL	HAND RAIL	INTACT	A	17	WAREHOUSE D	INTERIOR	Negative	0.09	
226	7/14/2011	WHITE	DRYWALL	WALL	INTACT	A	17	WAREHOUSE D (F-2)	INTERIOR	Negative	0	
227	7/14/2011	WHITE	CONCRETE	WALL	INTACT	A	14	WAREHOUSE D	INTERIOR	Null	0	
228	7/14/2011	WHITE	CONCRETE	WALL	INTACT	A	14	WAREHOUSE D	INTERIOR	Null	0.01	
229	7/14/2011	WHITE	CONCRETE	WALL	INTACT	A	14	WAREHOUSE D	INTERIOR	Negative	0	
230	7/14/2011	WHITE	CONCRETE	WALL	INTACT	A	14	WAREHOUSE D	INTERIOR	Negative	0	
231	7/14/2011	WHITE	PORCELAIN	SINK	INTACT	C	2	WAREHOUSE D	INTERIOR	Negative	0.01	
232	7/14/2011	BEIGE	CERAMIC	WALL	INTACT	A	2	WAREHOUSE D	INTERIOR	Negative	0.03	
233	7/14/2011					CALIBRATE				Positive	1.1	
234	7/14/2011					CALIBRATE				Positive	1.1	
						CALIBRATE				Positive	1.2	

Notes:

XRF - X-ray fluorescence spectrum analyzer
 mg/cm² - milligrams per square centimeter
 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

INT - Interior
 EXT - Exterior
 Null - Incomplete reading
 < 0.01 = Less than the limit of detection

APPENDIX D

CDPH LEAD HAZARD EVALUATION REPORT

LEAD HAZARD EVALUATION REPORT

Section 1 — Date of Lead Hazard Evaluation 7/14/2011

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>333 Turnbull Canyon Rd.</u>		City <u>City of Industry</u>	County <u>Los Angeles</u>	Zip Code <u>91745</u>
Construction date (year) of structure <u>1960s</u>	Type of structure <input type="checkbox"/> Multi-unit building <input type="checkbox"/> Single family dwelling <input checked="" type="checkbox"/> Other <u>Warehouse/office</u>	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, care of Craig Metheny</u> <u>Ardent Environmental Group, Inc.</u>		Telephone number <u>(951) 751-2996</u>		
Address [number, street, apartment (if applicable)] <u>1141 Pomona Rd., Suite 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 ^{in fair} lead-based paint detected Deteriorated lead-based paint detected
 No lead hazards detected Lead-contaminated dust found Lead-contaminated soil found Other _____

Section 6 — Individual Conducting Lead Hazard Evaluation

Name <u>Stephen Reese</u> <u>Winkler + Kelly</u>		Telephone number <u>(858) 244-0440</u>		
Address [number, street, apartment (if applicable)] <u>3750 Conway St., Suite 220</u>		City <u>San Diego</u>	State <u>CA</u>	Zip Code <u>92111</u>
CDPH certification number <u>13938</u>	Signature <u>Stephen Reese</u>	Date		

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

Jerry Sherman, Winkler and Kelly CDPH # 5809

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



September 2, 2011
Project No. 100252002

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
333 Turnbull Canyon Road
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 333 Turnbull Canyon Road, City of Industry, California (site). Suspect miscellaneous hazardous building materials include polychlorinated biphenyl (PCB)-containing light fixture ballasts, fluorescent light tubes (FLT)s, mercury-containing thermostat switches, and Halogen or Freon-containing equipment (e.g. air conditioning units and water coolers). This report has been prepared for Industry Urban-Development Agency (Agency) in general accordance with contract number 1-ARDENT 11-01 MP 10-13.

BUILDING LOCATION AND DESCRIPTION

The site is located at 333 Turnbull Canyon Road in the City of Industry, Los Angeles County, California (Figure 1). The site is located on the western corner of the intersection of Proctor Avenue and Turnbull Canyon Road and contains one commercial building. The site has been assigned the Tax Assessor's Parcel Number (APN) 8208-014-034.

The site consists of a rectangular shaped property comprising approximately 6.5 acres. The site contains one approximately 131,000 square foot industrial building that is currently vacant. The

building contains approximately 32,000 square feet of office area. The original portion of the building was constructed in 1963 in the southern portion of the site. Additions were added in phases with the majority being added in mid-1970s and an office addition in the northeastern corner of the building in the mid-1980s.

SURVEY RESULTS

Ardent performed a visual survey of the building on July 20, 2011. Based on the results of the survey, the following hazardous or universal waste materials were identified in the building.

- Fluorescent light tubes;
- Air-conditioning units;
- Water coolers; and
- Batteries.

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

Numerous fluorescent light ballasts (over 1,600) are located throughout the building. All ballasts that were able to be inspected were labeled as “No PCBs.” However, some ballasts in the warehouse area (approximately 836 ballasts) were not able to be inspected due to the height of the ceiling. Based on the inspection of the remainder of the building, these ballasts are not expected to be PCB-containing; however, the light ballasts in the warehouse area should be inspected for PCB content upon removal.

RECOMMENDATIONS

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

Ardent recommends that all light fixture ballasts be visually inspected prior to disposal to determine if they contain PCBs. Ballasts that are not marked “No PCBs” or “PCB Free” should be

considered PCB-containing. PCB-containing ballasts should be handled, transported, and disposed in accordance with the requirements of Title 22 of the California Code of Regulations (CCR), Section 67426.1.

Fluorescent light tubes should be removed and disposed of in accordance with the Universal Waste Rule, Title 22 CCR, Section 66273.

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

LIMITATIONS

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

The estimated quantities of PCBs, universal wastes, or other miscellaneous wastes provided in the table accompanying this report are for discussion and management purposes only. The actual quantities may vary and should be verified by the contractor prior to work.

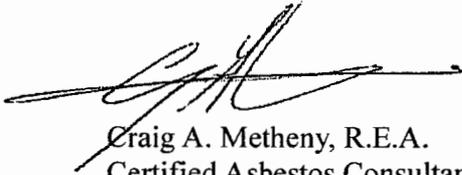
The findings and conclusions as presented in this letter are based on the services provided, and should not be interpreted as a warranty that hazardous waste does not exist elsewhere in the subject structure. All hazardous wastes in the site building may not have been identified by this survey due to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

The services summarized herein were performed in accordance with the local standard of care and state-of-the industry practices in the geographic region at the time the services were ren-

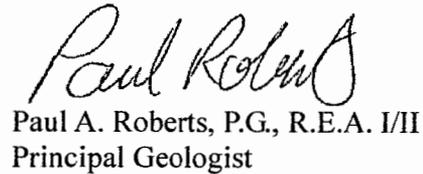
dered. Because the most comprehensive survey may not detect all asbestos in a building, Ardent cannot act as an insurer or certify that the site building is free of asbestos.

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
Light Ballasts	PCBs (unknown)	Warehouse	836
Fluorescent Light Tubes	Mercury	Throughout Building	1,990 – 4 ft long 1,180 – U-Shape 50 – 2 ft long
Air Conditioning Units	Freon or CFC gases	Roof	34
Water Coolers	Freon or CFC gases	Interior	3
Exit Signs and Thermostats	Batteries	Throughout Building	24
PCB – polychlorinated biphenyls CFC – Chlorofluorocarbons			