



ENGINEERS, GEOLOGISTS & ENVIRONMENTAL SCIENTISTS

December 2, 2021

Project No. 2101-0252

California State Lands Commission
100 Howe Avenue, Suite 100 South
Sacramento, California 95825-8202

Attention: Mr. Eric Gillies
Assistant Chief - Environmental Planning and Management

Subject: Report of Findings – Asbestos and Lead-Based Paint Survey,
PRC 421 Decommissioning Project, Pier Access Road,
Goleta, Santa Barbara County, California

Dear Mr. Gillies:

Padre Associates, Inc. (Padre), on behalf of California State Lands Commission (CSLC), completed an asbestos survey of the partially exposed, wrapped 6-inch diameter steel pipeline located along the pier access road, as well as a lead-based paint (LBP) survey of the support structure associated with Piers 421-1 and 421-2 at PRC 421 Decommissioning Project Site, Goleta, Santa Barbara County, California (Project Site). The location of the Project Site is presented on Plate 1 – Site Location Map.

OVERVIEW

Padre, on behalf of CSLC, conducted an asbestos survey of the exterior wrap on the single, 6-inch diameter steel pipeline partially exposed along the pier access road, as well as a LBP survey of the support structure associated with Piers 421-1 and 421-2 at the Project Site. The survey activities were conducted on November 23, 2021 to identify exterior pipeline wrap materials that may contain potential asbestos construction materials and LBP surface coatings, which would require special handling, disposal, or personal protective measures and procedures during planned removal, demolition, or deconstruction activities at the Project Site.

This survey was completed to identify any Asbestos-Containing Material (ACM) under the U.S. EPA National Emission Standards for Hazardous Air Pollutants (NESHAP) regulations (40 CFR Part 61, Subpart M) and the California Occupational Safety and Health Administration (Cal / OSHA) regulations (CCR Title 8, Section 1529), or Regulated Asbestos Containing Materials (RACM) under NESHAP, or Asbestos Containing Construction Materials (ACCM) under Cal / OSHA regulations.

Padre collected a total of four (4) bulk samples from the suspect asbestos materials, which were submitted to SGS Forensic Analytical Laboratories, Inc. (SGS Forensic) located in Hayward, California for microscopic analyses of asbestos using polarized light microscopy (PLM) by U.S. EPA method 600/R-93/116. SGS Forensic is accredited by the American Industrial Hygiene Association (AIHA), the National Voluntary Laboratory Accreditation Program (NVLAP), and the California Department of Public Health (Cal DPH). SGS Forensic was also instructed by Padre to

microscopically analyze any bulk samples that were indicated to contain “Trace” concentrations of asbestos as a result of the PLM analyses, utilizing the 1,000 Point Counting method to further quantify indicated asbestos concentrations.

Additionally, Padre collected two (2) surface coating samples (paint chip samples) at the Project Site, which were submitted to SGS Forensic for chemical analyses for the presence of total lead by U.S. EPA method 7082

The results of the PLM analyses for the presence of asbestos indicated that none of the four (4) bulk samples collected from the Project Site contained asbestos in excess of the laboratory reporting limits. Therefore, the four (4) bulk material samples were not further analyzed by the 1,000 Point Counting Method for quantification of asbestos concentrations.

The analytical results of the chemical analysis for the presence of total lead indicated that neither of the two (2) paint chip samples collected from the Project Site contained total lead at concentrations in excess of the analytical method reporting limits of 60 parts per million (ppm). Therefore, neither of the two (2) paint chip samples exceeded the California Lead in Construction Standard limit of 600 ppm for use as objective data in initial employee assessment demonstration, in accordance with Cal / OSHA Lead Construction Safety Orders, 8 CCR 1532.1.

Laboratory analytical results for the presence of asbestos are summarized in Table 1 – Asbestos Survey Results Summary Table. Photographic documentation of the sample locations is presented in Attachment 1 – Site Photographs. Field notes are presented in Attachment 2 – Field Notes. Laboratory analytical results completed by Forensic and Chain of Custody documentation are presented in Attachment 3 - Analytical Results and Chain-of-Custody Documentation.

Asbestos Survey Results Summary Table

Table 1 summarizes the asbestos material survey results conducted at the Project Site, and is provided as a reference to help identify ACM, RACM or ACCM; the location of the materials; the friability of the material; the material type; asbestos concentration; and the estimated quantity of the material.

Table 1 – Asbestos Survey Results Summary Table

Sample ID	Description / Location of Sample	Friable	Material	Asbestos Percent	Estimated Quantity
112321-ELLWOOD-A1	The sample was collected from the exposed portion of the 6-inch diameter pipeline along the west side of the pier access road, 50-ft west of the gate.	NA	Black Pipe Wrap and Mastic	ND	NA
112321-ELLWOOD-A2	The sample was collected from the exposed portion of the 6-inch diameter pipeline along the west side of the pier access road, 50-ft west of the gate.	NA	White Pipe Wrap and Mastic	ND	NA

Table 1 – Asbestos Survey Results Summary Table (Continued)

Sample ID	Description / Location of Sample	Friable	Material	Asbestos Percent	Estimated Quantity
112321-ELLWOOD-A3	The sample was collected from the exposed portion of the 6-inch diameter pipeline along the west side of the pier access road, 50-ft west of the gate.	NA	Black Pipe Wrap and Mastic	ND	NA
112321-ELLWOOD-A4	The sample was collected from the exposed portion of the 6-inch diameter pipeline along the west side of the pier access road, 50-ft west of the gate.	NA	White Pipe Wrap and Mastic	ND	NA

Note: ND = Not Detected at or in excess of the laboratory reporting limit.
NA = Not Applicable.

LBP Survey Results Summary Table

Table 2 summarizes the results of the LBP survey completed by Padre at the Project Site. A description of the sample is provided as a reference to help identify LBP surface coatings, the color of the surface coating, the condition of the surface coating, and the total lead concentration in the surface coating. All of the identified surface coatings reported to contain total lead concentrations in excess of the California Lead in Construction Standard Limit of 600 ppm are **bolded**.

Table 2 – LBP Survey Results Summary Table

Sample ID	Location of Sample	Color	Condition	Lead in Paint (PPM)	Estimated Quantity (ft ²)
112321-ELLWOOD-L1	The paint sample was collected from the support structure associated with Pier 421-1.	White / White	Some Flaking	<60	600
112321-ELLWOOD-L2	The paint sample was collected from the support structure associated with Pier 421-2.	White / White	Some Flaking	<60	600

Note: ft² = Square Feet
PPM= Parts Per Million.

ASBESTOS RESULTS

The results of the asbestos survey completed by Padre at the Project Site on November 23, 2021, as well as a review of the PLM analytical results completed by Forensic, did not indicate the presence of asbestos at, or in excess of the laboratory reporting limit in any of the four (4) bulk material samples collected. Therefore, the four (4) indicated bulk material samples were not further analyzed by the 1,000 Point Counting Method for quantification of asbestos concentrations.

LEAD-BASED PAINT RESULTS

The chemical analyses of the neither of the two (2) paint chip samples collected at the Project Site indicated the presence of total lead at concentrations at, or in excess of, the laboratory reporting limits of 60 ppm. Therefore, the two (2) paint chip samples were not indicated to contain total lead concentrations in excess of the California Lead in Construction Standard Limit of 600 ppm for use as objective data in initial employee assessment demonstration.

RECOMMENDATIONS

All applicable state of California and federal rules and regulations should be followed to protect workers, site personnel, local residents, the community, and the environment during the course of deconstruction, maintenance, renovation, demolition, disposal, or recycling activities in accordance with state of California, Cal / OSHA, federal OSHA and U.S. EPA / NESHAP rules and regulations.

Additional suspect asbestos or LBP materials may be discovered at the Project Site during the course of the planned activities that were not evident, visible, or within the scope of work at the time that this inspection and survey was completed. If suspect construction materials are encountered, then those materials should be assumed to contain asbestos at concentrations above regulatory action limits until objectively determined otherwise.

LIMITATIONS AND ASSUMPTIONS

This asbestos survey letter report has been prepared for the sole benefit of CSLC. No other persons may rely on the findings of this report without the expressed written consent of CSLC and Padre.

In performing our professional services, we have attempted to apply present engineering and scientific judgment and use a level of effort consistent with the standard of practice measured on the date of work and in locale of the Project Site for similar type studies. Padre makes no warranty, expressed or implied.

Based on the nature of the survey and the sample collection techniques utilized, assumptions regarding the homogenous nature of bulk materials and access to the areas in question have been made. No warranty can be made regarding the content or condition of any materials that are physically or visually inaccessible.

During the course of the survey and sample collection activities, every attempt was made to survey all physically and visually accessible suspect materials, within the scope of this survey at the Project Site. The following areas were not accessible, or were determined to be out of scope at the time of the survey:

- Any materials or equipment that may be below the ground and / or water surface are out of the scope of this survey; and
- Additional pipeline material that were not visible or accessible at the time of this survey.

It is possible that additional asbestos and LBP materials may exist that were not accessible, visible or apparent at the time of the survey. This survey includes only those materials that were included in the scope of this survey. If suspect materials are discovered during the

course of the planned activities that have not been included in this survey, then those materials should be assumed to be present at concentrations above regulatory action limits until objectively determined otherwise.

The analyses and interpretations presented in this report have been developed based on the results from the review of existing information pertaining to the Project Site and the results from the laboratory analyses of the subject materials.

Padre's estimated quantities of construction and building materials or surface coatings are provided as an estimate of the materials present at the time of the survey, within the subject scope of work. The estimated quantities are not specific to individual components but are provided as an estimate of the quantities of a homogeneous material. Estimated quantities are not intended to be used by abatement contractors for bidding purposes, and all estimated quantities should be independently verified by others before further use.

CLOSURE

If you have any questions or require additional information, please contact Mr. Scott Santala at (805) 786-2650, extension 123, or ssantala@padreinc.com.

Sincerely,

PADRE ASSOCIATES, INC.



Andrew H. Park, CAC 18-6331
Project Manager



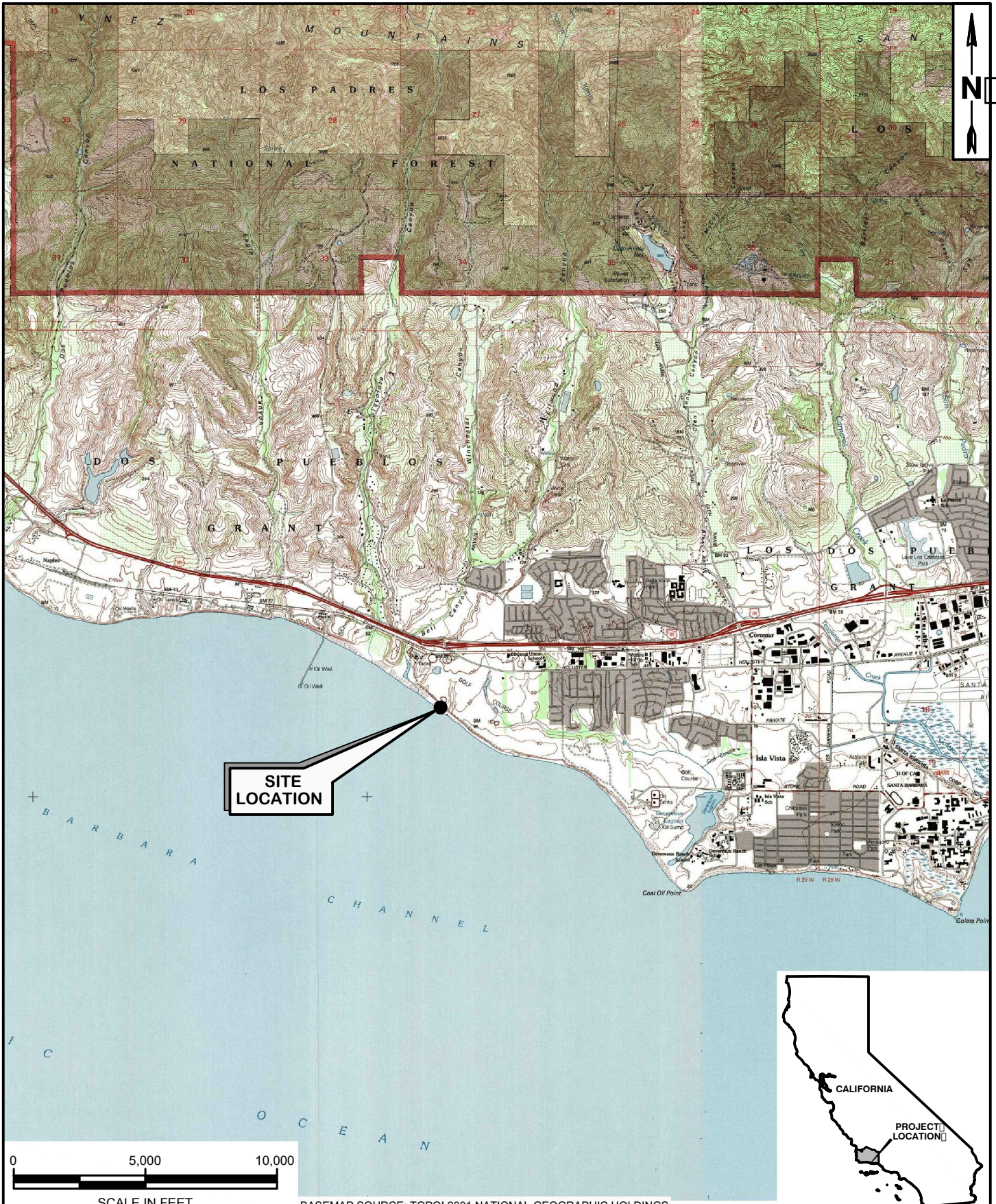
Scott S. Santala, CAC 09-4494
Senior HES Manager

AHP:SSS:JKS:ap

Plates: Plate 1 – Site Location Map
Plate 2 – Site Sampling Plan

Attachments: Attachment 1 – Site Photographs
Attachment 2 – Field Notes
Attachment 3 – Analytical Report and Chain-of-Custody Documentation

PLATES



Z:\Current Projects\2101-0252 CSLC PRC 421 Decommissioning\Graphics\PRC 421 Decommissioning Project.dwg, 11/30/2021 8:55:33 AM

<p>padre associates, inc. ENGINEERS, GEOLOGISTS & ENVIRONMENTAL SCIENTISTS</p>	PROJECT NAME: Asbestos-LBP Survey PRC 421 Decommissioning Project Access Road, Goleta Santa Barbara County, CA	<h1>SITE LOCATION MAP</h1>	PLATE <h1>1</h1>
	PROJECT NUMBER: 2101-0252		DATE: December 2021

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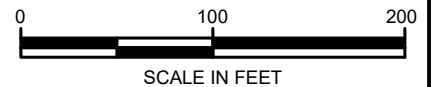


LEGEND

- 1 ● ASBESTOS SAMPLE LOCATION
ASBESTOS CONCENTRATIONS NON DETECT
 - L1 ● LEAD BASED PAINT (LBP) SAMPLE LOCATION WITH
LEAD CONCENTRATIONS BELOW REPORTING LIMIT
- 112321-ELLWOOD- SAMPLE NOMENCLATURE PREFIX 112321-ELLWOOD-
ARE NOT DISPLAYED FOR PRESENTATION

NOTES:

1. BASEMAP SOURCE: GOOGLE EARTH PRO ; IMAGE DATE 2-28-2021
2. ppm = PARTS PER MILLION



<p>padre associates, inc. ENGINEERS, GEOLOGISTS & ENVIRONMENTAL SCIENTISTS</p>	<p>PROJECT NAME: Asbestos-LBP Survey PRC 421 Decommissioning Project Access Road, Goleta Santa Barbara County, CA</p>	<p>SITE SAMPLING PLAN</p>	<p>PLATE</p>
	<p>PROJECT NUMBER: 2101-0252</p>		<p>DATE: December 2021</p>

**ATTACHMENT 1
SITE PHOTOGRAPHS**



Asbestos Survey
Partially Exposed 6-Inch Diameter Steel Pipeline along Pier Access Road
PRC 421 Decommissioning Project, Goleta,
Santa Barbara County, California



112321-ELLWOOD-A1
Black Pipe Wrap and Mastic
(No Asbestos Detected)



112321-ELLWOOD-A2
White Pipe Wrap and Mastic
(No Asbestos Detected)



112321-ELLWOOD-A3
Black Pipe Wrap and Mastic
(No Asbestos Detected)



112321-ELLWOOD-A4
White Pipe Wrap and Mastic
(No Asbestos Detected)



Lead-Based Paint Survey
Piers 421-1 and 421-2
PRC 421 Decommissioning Project, Goleta,
Santa Barbara County, California



112321-ELLWOOD-L1
Pier 421-1
White Paint
(<60 PPM Total Lead)



112321-ELLWOOD-L2
Pier 421-2
White Paint
(<60 PPM Total Lead)

Notes: PPM = Part Per Million

**ATTACHMENT 2
FIELD NOTES**

ASBESTOS Field Form

Client / Site Address **Ellwood, Goleta**

Date **11/23/21** Project No **2101-0252**

Client / Site Address

Sample ID	Time	Location / Functional Space	Type	Qty (ft ²)	Friable (Y/N)	Comments / Condition	Photo ID
112321- ELLWOOD -A1	1400	6" PL along pier access road, 50-ft West of Gate,	Black wrap w/ mastic	10LF Exposed	N		
" - A2	1405	in the brush	white wrap w/ mastic				
" - A3	1410		w/A1				
" - A4	1415		w/A2				

Signature 

LBP Field Form

Date: 11/23/21 Project No: 2101-0252 Client / Site Address: ELWOOD, Goleta

Sample ID	Time	Location	Color / Layers	Condition	Qty (ft ²)	Comments	Photo ID
112321- ELWOOD- 61	1420	Pier 421-1 Support structure	white	Some flaking ↓	600		
" " -L2	1425	Pier 421-2 Support structure	white		600		

Signature JBR Page 1 of 1

**ATTACHMENT 3
ANALYTICAL REPORT AND
CHAIN-OF-CUSTODY DOCUMENTATION**

Bulk Asbestos Analysis

(EPA Method 40CFR, Part 763, Appendix E to Subpart E and EPA 600/R-93-116, Visual Area Estimation)
NVLAP Lab Code: 101459-0

Padre Associates, Inc.
Project Manager
1861 Knoll Drive

Ventura, CA 93003

Client ID: L1185
Report Number: B325937
Date Received: 11/29/21
Date Analyzed: 11/29/21
Date Printed: 11/29/21
First Reported: 11/29/21

Job ID/Site: 2102-0252 - ELLWOOD

SGSFL Job ID: L1185
Total Samples Submitted: 4
Total Samples Analyzed: 4

Date(s) Collected: 11/23/2021

Sample ID	Lab Number	Asbestos Type	Percent in Layer	Asbestos Type	Percent in Layer	Asbestos Type	Percent in Layer
112321-ELLWOOD-A1	12502223						
Layer: Yellow Non-Fibrous Material							ND
Layer: Black Tar							ND
Total Composite Values of Fibrous Components:		Asbestos (ND)					
Cellulose (Trace)							
112321-ELLWOOD-A2	12502224						
Layer: Yellow Non-Fibrous Material							ND
Layer: Black Tar							ND
Total Composite Values of Fibrous Components:		Asbestos (ND)					
Cellulose (Trace)							
112321-ELLWOOD-A3	12502225						
Layer: Black Non-Fibrous Material							ND
Layer: Black Tar							ND
Total Composite Values of Fibrous Components:		Asbestos (ND)					
112321-ELLWOOD-A4	12502226						
Layer: Black Non-Fibrous Material							ND
Layer: Black Tar							ND
Total Composite Values of Fibrous Components:		Asbestos (ND)					



Tad Thrower, Laboratory Supervisor, Hayward Laboratory

Note: Limit of Quantification ('LOQ') = 1%. 'Trace' denotes the presence of asbestos below the LOQ. 'ND' = 'None Detected'.

Analytical results and reports are generated by SGS Forensic Laboratories (SGSFL) at the request of and for the exclusive use of the person or entity (client) named on such report. Results, reports or copies of same will not be released by SGSFL to any third party without prior written request from client. This report applies only to the sample(s) tested. Supporting laboratory documentation is available upon request. This report must not be reproduced except in full, unless approved by SGSFL. The client is solely responsible for the use and interpretation of test results and reports requested from SGSFL. SGSFL is not able to assess the degree of hazard resulting from materials analyzed. SGS Forensic Laboratories 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. All samples were received in acceptable condition unless otherwise noted.

CHAIN OF CUSTODY RECORD

Client Name/Account #: Padre Associates, Inc.
 Address: 369 Pacific Street
 City/State/Zip: San Luis Obispo, California 93401
 Telephone Number: 805.786.2650 Fax No.: 805.786.2651
 Project No. / Name: 2102-0252/ELLWOOD
 Laboratory: Forensic
 Report To: Scott Santala (Ssantala@padreinc.com); Andy Park (apark@padreinc.com)

Sampler: Andy Park, CAC 18-6331

Invoice To: Padre Associates, Inc.
1861 Knoll Drive
Ventura, CA 93003
ap@padreinc.com

Sample ID / Description	Date Sampled	No. of Containers	Sample Matrix	Preservative	Container Type	PLM US EPA 600/R-93-116	ANALYSIS REQUIRED	NOTES / TIME
112321-ELLWOOD-A1	11/23/21	1	bulk	np	MSTHC	X		1400
112321-ELLWOOD-A2						X		1405
112321-ELLWOOD-A3						X		1410
112321-ELLWOOD-A4						X		1415

Turn Around Time (Check):

Same Day
 24 Hours
 48 Hours
 3 Days
 5 Days

Comments:

Special Instructions:

- Send all reports to San Luis Obispo office address. Invoice to Ventura address.
- Please combine results and COC into one final pdf document when e-mailed
- Perform NESHAP 1,000 point count on any sample that is indicated with "Trace" asbestos concentrations by PLM method.



Relinquished by: [Signature] Date: 11/23/21 Time: 1500

Relinquished by: _____ Date: _____ Time: _____

Metals Analysis of Paints

(AIHA-LAP, LLC Accreditation, Lab ID #101762)

Padre Associates, Inc.
Project Manager
1861 Knoll Drive

Ventura, CA 93003

Client ID: L1185
Report Number: M237869
Date Received: 11/29/21
Date Analyzed: 11/29/21
Date Printed: 11/29/21
First Reported: 11/29/21

Job ID / Site: 2102-0252 - ELLWOOD

Date(s) Collected: 11/23/21

SGSFL Job ID: L1185
Total Samples Submitted: 2
Total Samples Analyzed: 2

Sample Number	Lab Number	Analyte	Result	Result Units	Reporting Limit*	Method Reference
112321-ELLWOOD-L1	30898123	Pb	< 60	ppm	60	EPA 3050B/7000B
112321-ELLWOOD-L2	30898124	Pb	< 60	ppm	60	EPA 3050B/7000B

* The Reporting Limit represents the lowest amount of analyte that the laboratory can confidently detect in the sample, and is not a regulatory level. The Units for the Reporting Limit are the same as the Units for the Final Results.



Kevin Poon, Laboratory Analyst, Hayward Laboratory

Analytical results and reports are generated by SGS Forensic Laboratories at the request of and for the exclusive use of the person or entity (client) named on such report. Results, reports or copies of same will not be released by SGS Forensic Laboratories to any third party without prior written request from client. This report applies only to the sample(s) tested. Supporting laboratory documentation is available upon request. This report must not be reproduced except in full, unless approved by SGS Forensic Laboratories. The client is solely responsible for the use and interpretation of test results and reports requested from SGS Forensic Laboratories. SGS Forensic Laboratories is not able to assess the degree of hazard resulting from materials analyzed. SGS Forensic Laboratories 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. Any modifications that have been made to referenced test methods are documented in SGS Forensic Laboratories' Standard Operating Procedures Manual. Sample results have not been blank corrected. Quality control and sample receipt condition were acceptable unless otherwise noted.

Note* Sampling data used in this report was provided by the client as noted on the associated chain of custody form.

Client Name/Account #: Padre Associates, Inc.
Address: 369 Pacific Street
City/State/Zip: San Luis Obispo, California 93401
Telephone Number: 805.786.2650
Project No. / Name: 2102-0252/ELLWOOD
Laboratory: Forensic
Report To: Scott Santala (ssantala@padreinc.com); Andy Park (apark@padreinc.com)

Invoice To: Padre Associates, Inc.
 1861 Knoll Drive
 Ventura, CA 93003
 ap@padreinc.com

Sampler: Andy Park,
Fax No.: 805.786.2651

Sample ID / Description	Date Sampled	No. of Containers	Sample Matrix	Preservative	Container Type	Total Lead (Pb) US EPA 3050B/7420	ANALYSIS REQUIRED	NOTES / Time
112321-ELLWOOD-L1	11/23/21	1	paint chip	du	plastic	X		1420
112321-ELLWOOD-L2						X		1425
<i>(Signature)</i>								

Special Instructions:
 1. Send all reports to San Luis Obispo office address. Invoice to Ventura address.
 2. Please combine results and COC into one final pdf document when e-mailed

Turn Around Time (Check)
 Same Day
 24 Hours
 48 Hours
 3 Days
 5 Days

Comments:

Relinquished by:	Date	Time	Shipped via:	Received by:	Date	Time
<i>(Signature)</i>	11/23/21	1500		<i>(Signature)</i>	11/23/21	1500
Relinquished by:	Date	Time		Received by:	Date	Time

Stamp: RECEIVED NOV 29 9 REC'D
 11/23/21 15:00
(Signatures: OJVM, WPS)