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April 20, 2023  
Project No. 101278004

Ms. Montana Kanen  
Overton Moore Properties  
19700 South Vermont Avenue, Suite 101  
Torrance, California 90502

Subject: **Response to Review of Hazardous Building Materials Survey (Enercon 2022)**  
15006, 15010 and 15100 Nelson Avenue  
City of Industry, California

This memorandum summarizes ENERCON responses to the peer review comments of the subject Materials Survey Report performed by Mr. Yvan Schmidt of Vista Environmental on behalf of Leighton Consulting, Inc.. These comments were included in the March 16, 2023, Peer Review report prepared by Leighton Environmental and addressed to CASC Engineering and Consulting, Inc. The following summarizes ENERCON responses to the review comments. The original comments are stated first followed by ENERCON response. A revised copy of the report including the incorporated comments is provided under separate cover.

## 5.0 Review of Applicable Guidance and Standards

***Comment 5.1A (Contact Information Missing):*** *On Page 3, within the “Asbestos Analytical Method and Results” section, it is a requirement of South Coast Air Quality Management District (SCAQMD) Rule 1403 that the narrative portion of any asbestos assessment report must include the contact information (address and phone number) and NVLAP-accreditation number of the laboratory that performs the analysis. The fact that this information is included on the laboratory’s report in Attachment A of the report does not satisfy SCAQMD Rule 1403 requirements. The report should be modified to include the required information within the report narrative in order to bring it into compliance with SCAQMD requirements.*

### Response:

Lab address (2556 West Woodland Drive, Anaheim, California) and NVLAP lab code (500079-0) was addressed in revised report.

**Comment 5.1B (ACM Categorization):** *On Page 4, within the “Detected ACM” table, the listed ACMs do not include a proper assessment of their SCAQMD category. Specifically, in the condition column of the table, non-friable ACM must be categorized as Class I or Class II non-friable in order to satisfy SCAQMD Rule 1403 requirements. This information could be added anywhere within the narrative report, and does not specifically have to be in the subject table, but must be included in the report.*

Response:

The condition column of the referred table was revised, to include non-friable ACM categorized as Class I or Class II non-friable in order to satisfy SCAQMD Rule 1403 requirements in revised report.

**Comment 5.1C (Signature vs. Qualifications Appendices):** *Page 9, in the signature block section, there is a signature block for David Escalante, a Cal/OSHA Certified Site Surveillance Technician (CSST). Mr. Escalante’s involvement in the project is not discussed anywhere in the report, the signature block does not cite his CSST certification number, and there is not a copy of his certification card in Attachment C (Qualifications) of the report.*

*Either Mr. Escalante’s certification number must be included in the signature block and a copy of his certification added to Attachment C of the report, or else his signature should be removed from the report.*

Response:

David Escalante’s CAC (#22-7277) and attached certification card was added to the revised report.

**Comment 5.1D (Chain of Custody Deficiency):** *The chain-of-custody (COC) forms utilized for submitting samples to the laboratory do not comply with SCAQMD requirements. The first page of the COC for Lab Number 2215000 is a cover page indicating the project information, and has the indications and signatures of who dropped the samples and who accepted the samples at the laboratory, followed by individual sample information on subsequent pages. For Lab Numbers 2215001, 2215002 and 2215003, only the individual sample information pages, which lack project information and have lab signatures, but not the sample relinquisher’s signature, are present.*

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As per recent SCAQMD review comments, each COC must have a clear indication of who relinquished the samples, who received the samples, and a clear legible signature or a signature and clear legible printed/typed name for each COC. For Lab Numbers 2215001, 2215002 and 2215003, only a lab signature indicating who accepted the samples at the laboratory is present.

Response:

Comment noted, the samples were all submitted under a single COC and split by the laboratory. The original first page of the COC has the signature and will suffice under SCAQMD.

## 5.1 Review of Scope of Work, Findings, Opinion and Conclusions

**Comment 5.2A (Clarification on Quantification of LBP):** On Page 5, in the “Detected LBPs and/or LBSs” table, the last item (tan paint on metal rain gutters for Building 5), the quantity is listed as 380 square feet, whereas it is listed as 380 linear feet in the report in Appendix B of the report. This discrepancy should be clarified.

Response:

Page 5 has been revised to consistently address the quantities classification discrepancy in the revised report.

**Comment 5.2B (No Hardscape Testing):** There is no indication that hardscapes, such as the asphalt associated with the site, have been tested for asbestos content. The SCAQMD requires that any asphalt to be impacted by demolition must be tested for asbestos content, and that such sampling involve coring or otherwise collecting the entire thickness of the asphalt system, to ensure that, if present, any petromat is captured in the sampling.

In the event that any demolition of asphalt is to occur, the asphalt must be bulk sampled as a surfacing material in accordance with SCAQMD, USEPA and Cal/OSHA requirements. If less than 1,000 square feet of asphalt shall be impacted, three samples shall be collected and analyzed for asbestos content. For 1,000 to 5,000 square feet of asphalt impact, five samples will be required, and if more than 5,000 square feet of asphalt impact is to occur, seven samples will be required.

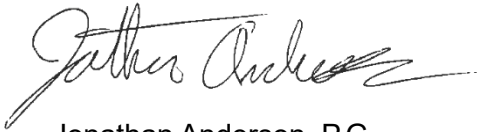
Response:

Acknowledged. In the event that any demolition of asphalt is to occur, the asphalt would be bulk sampled as a surfacing material in accordance with SCAQMD, USEPA and Cal/OSHA requirements.

Should you have any questions or comments, please contact the undersigned at your convenience.

Sincerely,

**Enercon Services, Inc.**



Jonathan Anderson, P.G.  
Project Geologist



Hooshang Nezafati, P.H.D., P.E.  
Environmental Service Manager

HN/JPA/aw

Distribution: (1) Addressee (electronic copy)

Attachment A – Revised Hazardous Materials Survey Report

**APPENDIX A**  
**REVISED HAZARDOUS MATERIALS SURVEY REPORT**

September 26, 2022  
Revised: April 20, 2023  
Project No. 101278004

Ms. Montana Kanen  
Overton Moore Properties  
19700 South Vermont Avenue, Suite 101  
Torrance, California 90502

Subject:       **Hazardous Building Material Survey**  
                  15006, 15010 and 15100 Nelson Avenue  
                  City of Industry, California

Dear Mr. Hines:

Enercon Services, Inc. (ENERCON) performed hazardous building material surveys for asbestos, lead and miscellaneous hazardous materials for the three buildings located at the property identified as 15006, 15010 and 15100 Nelson Avenue in City of Industry, California (Site). The Site contains five buildings constructed at various times from the 1940s to approximately 1980. The buildings consist of a single-story office (Figure 1), a single-story concrete block garage/storage (Figure 2), a single-story mobile office (Figure 3), a single-story metal garage/storage (Figure 4) and a single-story metal office /storage (Figure 5). The buildings comprise approximately 23,500 square feet. For the purposes of this survey, the buildings have been numbered 1 through 5, as follows:

- Building 1 – 15006 Nelson Avenue – 1,408 SF, 1-Story Stucco - Office
- Building 2 – 15006 Nelson Avenue – 3,500 SF, 1-Story Block - Garage/Storage
- Building 3 – 15010 Nelson Avenue – Mobile Office - Office
- Building 4 – 15100 Nelson Avenue – 14,740 SF, 1-Story Metal – Office/Garage/Storage
- Building 5 – 15100 Nelson Avenue – 2,408 SF, 1-Story Metal – Office/Storage

The objective of the hazardous building material survey was to assess the presence and quantity of asbestos-containing materials (ACM), lead-containing surface coatings (LCSCs), lead-bearing substances (LBSs), lead-based paints (LBPs), and other miscellaneous hazardous building materials in the Site buildings.

## **SCOPE OF SERVICES**

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

- Conducted a comprehensive survey of the site buildings to identify suspect ACM. Table 1 summarizes the homogeneous areas of suspect ACM identified during the survey.
- Collected 73 representative bulk samples of suspect ACM throughout the site buildings.
- Analyzed 73 samples for bulk asbestos content by polarized light microscopy (PLM) in accordance with EPA method 600/R-93/116 by an NVLAP accredited laboratory.
- Analyzed 3 samples by the EPA Point Count 1000 Method.
- Performed a survey of the site building for miscellaneous hazardous materials, including materials such as PCB-containing light ballasts and electrical transformers, mercury-containing pressure gauges and light bulbs, chlorofluorocarbon (CFC)-containing equipment (refrigerants), and radioactive sources.
- Lead testing of building components for the presence and condition of LCSCs, LBSs, and LBPs. The testing was conducted using a Niton XL x-ray fluorescence (XRF) device. Building components determined to be LCSC, LBS, or LBP were quantified.
- Preparation of this report.

## DEFINITION OF TERMS

The terms asbestos-containing material (ACM) and asbestos-containing construction material (ACCM) used in this report are defined below:

- ACM – Asbestos-Containing Material. Defined by the U.S. Department of Labor as any material containing greater than 1 percent asbestos.
- ACCM – Asbestos-Containing Construction Material. Defined by the California Division of Occupational Safety and Health as any manufactured construction material which contains more than 1/10th of 1 percent (0.1 percent) asbestos. In practice, because regulations for ACM cover all materials with greater than 1 percent asbestos, ACCM generally refers to all materials with greater than 0.1 percent asbestos but less than or equal to 1 percent asbestos

## ASBESTOS SAMPLING

The asbestos survey and sampling were performed from August 24 and 25, 2022, by David Escalante and Craig Metheny, both California Certified Asbestos Consultants (CACs). 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 homogenous areas of suspect asbestos-containing building materials in the site buildings.

Bulk samples were collected and handled using the following general procedures:

1. The location, type, quantity, and condition of suspect ACM was identified and tabulated.
2. The suspect materials were divided into homogeneous areas. A homogeneous area 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 areas.
4. Bulk samples were collected by trained and certified personnel using appropriate sampling tools, wet methods, and leak-tight containers. Each sample was recorded on a sampling log.
5. Decontamination of sampling tools between sampling locations.
6. A chain-of-custody record was maintained for the samples from collection to delivery to the laboratory.

A total of 73 bulk samples were collected from the site buildings. Homogeneous areas of suspect materials are summarized in Table 1. Sample locations are depicted in Figures 1 through 5.

### **ASBESTOS ANALYTICAL METHOD AND RESULTS**

The bulk samples were submitted to AIH Laboratory, located at 2556 West Woodland Drive, in Anaheim, California, an NVLAP accredited laboratory (NVLAP Lab Code: 500079-0), for analysis of asbestos content. The samples were analyzed by polarized light microscopy (PLM) in accordance with EPA method 600/R-93/116. The PLM method used has a quantification limit of 1 percent and asbestos detected at less than 1 percent is reported as “Trace.” Materials containing greater than 1 percent asbestos are considered ACM. A material reported to have a “Trace” amount of asbestos (present at less than 1 percent) should be treated as an ACCM unless analyzed by other methods, such as the Point Count 1,000 or gravimetric reduction methods, which have a detection limit of 0.1 percent. Materials reported to contain less than 0.1 percent by this method would not be considered an ACM or ACCM. Based on the PLM results, three samples were further analyzed by the Point Count 1000 method. Table 2 summarizes the sample results. The laboratory reports are presented as Attachment A.

### **LEAD SURVEY**

The lead survey was performed on August 25, 2022, by a Vista representative working under ENERCON subcontract and supervision. Suspect LCSCs, LBPs and LBSs were identified via visual inspection. Representative surface coatings and materials were tested utilizing a hand-held XRF device. A copy of a lead survey report by Vista, dated September 22, 2022, is provided as Attachment B.



### MISCELLANEOUS HAZARDOUS MATERIAL SURVEY RESULTS

ENERCON performed a visual survey of the buildings for miscellaneous hazardous building materials on August 25, 2022. Based on the results of the survey, the following hazardous or universal waste materials were identified in the buildings.

- Fluorescent light tubes.
- Refrigeration units.
- PCB-containing light ballasts and electrical transformers.
- Mercury-containing pressure gauges and light bulbs

The estimated quantities of these materials are summarized in the Conclusions section below.

### CONCLUSIONS

Based on the asbestos inspection and analytical testing results, the materials listed in the following table were found to contain detectable concentrations of greater than 1 percent of asbestos (ACM):

**DETECTED ACM (greater than 1% asbestos content)**

HA	Description	Building	Location <sup>1</sup>	Estimated Quantity <sup>1</sup>	Condition
1D	Black Mastic under gray VFT	Building 1	Rooms 1 Through 8	1,240 SF	Good/Class II non-friable
2B	Black Mastic	Building 2	Roof Vents	50 SF	Good/Class II non-friable
5C	Black Mastic	Building 5	Roof Screws	150 SF	Good/Class II non-friable

**Notes:**

1 = Quantities and Locations are estimates only, it is the responsibility of the contractor to verify quantities and locations.

HA = Homogeneous Area (see Table 1)

VFT = Vinyl Floor Tile

SF = Square Feet

Sample locations and room numbers are shown in Figures 1-5.

Asbestos was not detected in all other suspect materials sampled and tested (Table 2).

Based on the results of the lead survey, the following LBP or LBSs were identified in the site buildings.

**DETECTED, LBPs and/or LBSs (greater than 1.0 milligram per square centimeter or greater)**

MATERIAL	DESCRIPTION (COLOR/SUBSTRATE)	LOCATION	CONDITION	CONTAMINANT	ESTIMATED QUANTITY <sup>1</sup>
<b>Building 1 - 15006 Nelson Ave</b>					
Parking Stripe	Yellow/Concrete	Exterior	Intact	Lead-Based Paint	300 LF
<b>Building 2 - 15006 E Nelson Ave</b>					
Pipe	Yellow Metal	Interior	Intact	Lead-Based Paint	200 LF
Gutter	Tan/Metal	Exterior	Intact	Lead-Based Paint	380 LF
<b>Building 3 - 15010 E Nelson Ave</b>					
No Lead-Based Paints or Lead Bearing Substances Detected					
<b>Building 4 - 15100 E Nelson Ave</b>					
No Lead-Based Paints/Lead Bearing Substances Detected					
<b>Building 5 - 15100 E Nelson Ave</b>					
Pipe	Yellow/Metal	Interior	Intact	Lead-Based Paint	200 LF
Gutter	Tan/Metal	Exterior	Intact	Lead-Based Paint	380 LF
Notes: 1 = Quantities and Locations are estimated only. It is the responsibility of the contractor to verify quantities and locations. Lead-Containing Surface Coatings Detected, See XRF Data Table in Lead Survey Report (Appendix B) LF = Linear Feet					

Based on a visual inspection, the following universal wastes (UW) and/or miscellaneous hazardous building materials were identified in the Site buildings:

**IDENTIFIED UW and MISCELLANEOUS HAZARDOUS MATERIALS**

<b>Material Description</b>	<b>Location</b>	<b>Quantity</b>
Fluorescent Light Tubes	Bldg. 1- 15006 Nelson Avenue	64, 4-ft tubes
	Bldg. 2 - 15006 Nelson Avenue	48, 4 ft-tubes
	Bldg. 4- 15100 Nelson Avenue	148, 4 ft-tubes
Fluorescent Light Ballasts	Bldg. 1- 15006 Nelson Avenue	32 EA
	Bldg. 2 - 15006 Nelson Avenue	12 EA
	Bldg. 4- 15100 Nelson Avenue	74 EA
Fluorescent Light Tubes with Ballasts	Bldg. 1- 15006 Nelson Avenue	2, 2 ft-tubes
Refrigeration Units	Bldg. 1- 15006 Nelson Avenue	1 EA
	Bldg. 3- 15010 Nelson Avenue	1 EA
	Bldg. 4- 15100 Nelson Avenue	4 EA
Mercury Pressure Gauge	Bldg. 2 - 15006 Nelson Avenue	1 EA
Electrical Transformer	Other	1 EA
EA = Each		

**RECOMMENDATIONS**

The following sections present ENERCON'S recommendations regarding asbestos and lead at the Site buildings.

**Asbestos**

The results of the asbestos survey indicate that ACM **are present** in select Site buildings. The ACM are summarized in the Conclusions section above. The EPA and State of California specify that ACM classified as friable, or that could become friable during demolition, are to be removed prior to demolition activities. According to the EPA, Class II non-friable 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. The NESHAPs require that both friable and Class II non-friable that could become friable be removed prior to renovation or demolition of buildings.

At no time should the identified ACM be drilled, cut, sanded, scraped, or otherwise disturbed by untrained personnel. These materials should be removed prior to any activities which will

disturb these materials. Asbestos disturbance and/or removal must be conducted by a California DOSH registered and State licensed asbestos removal contractor.

### **Lead**

As indicated in the Vista report, the results of the lead testing indicate that LBPs and LBS's **are present** at select areas of the site. Please refer to the Vista lead survey report (Attachment B) for specific recommendations regarding LBP and LBS.

### **Miscellaneous Hazardous Building Materials**

The results of the miscellaneous hazardous building materials survey indicate that hazardous and universal waste rule materials are present at the Site buildings. ENERCON recommends that each of these materials be removed and properly disposed of prior to demolition or renovation of the buildings.

ENERCON spot-checked light fixture ballasts and did not locate any that contain PCBs. However, ENERCON 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.

## **QUALIFICATIONS**

ENERCON team members and subcontractors are qualified or are properly licensed or certified to do the work described herein. Copies of relevant qualifications are provided as Attachment C and in the Vista lead survey report (Attachment B).

## 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, expressed 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 structures investigated.

The estimated quantities of ACM, ACCM, LBP, and LBS provided in this report are for discussion and management purposes only. The actual quantities may vary and should be verified by the removal contractor prior to demolition or renovation.

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 building materials do not exist elsewhere in the Site buildings. All ACM, ACCM, LBP, and/or LBS in the Site buildings 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 and lead in the buildings.

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, ENERCON cannot act as an insurer or certify that the Site building is free of asbestos.

We appreciate this opportunity to be of service.

Sincerely,

**Enercon Services, Inc.**



David Escalante  
Certified Asbestos Consultant #22-7277



Craig A. Metheny  
Certified Asbestos Consultant #08-4421

CM/DA/aw

Attachments: Table 1 – Homogeneous Areas of Suspect Asbestos-Containing Materials  
Table 2 – Asbestos Sample Results  
Figures 1 – Site Plan  
Figures 2 through 6 – Sample Location Maps  
Attachment A – Laboratory Reports  
Attachment B – Lead Survey Report  
Attachment C – Qualifications

Distribution: (1) Addressee (via email)

**TABLE 1 - HOMOGENEOUS AREAS (HAs) OF SUSPECT ASBESTOS-CONTAINING MATERIAL**

Building Number	HA	Description	Location(s)
Building 1	1A	Drywall & Joint Compound	Throughout
	1B	Tan Baseboard Mastic	Throughout
	1C	Spray-on Acoustic Ceiling	Throughout (except hall soffit)
	1D	Gray 12 X 12 VFT with Yellow & Black Mastic	Rooms 1-8
	1E	Gray VSF with Tan Mastic	Restroom 1- Room 9
	1F	Gray 12X12 VFT over White VFT with Yellow Mastic	Restroom 2, Room 10
	1G	Stucco Plaster	Exterior
	1H	Off-White 12X12 VFT w/Tan & Black Mastic	Room 1- Under 1D
	1I	Roof Core	Roof
	1J	Black Mastic	Roof Penetrations
	1K	Black Mastic	Parapet Wall Cap Screws
Building 2	2A	Roof Core	Roof
	2B	Black Mastic with Silver Paint	Roof Penetrations
	2C	Tape with White Sealant	Roof Parapet Wall Cap Screws
	2D	White Sealant with Silver Paint	Skylight
Building 3	3A	Roof Core	Roof
	3B	Black Sealant	Roof Seam
	3C	Baseboard Mastic (Off-White)	Throughout
	3D	Tan VSF with Yellow Mastic	Throughout
Building 4	4A	Drywall & Joint Compound	Throughout
	4B	Baseboard Mastic	Few Offices
	4C	Ceiling Panels	1 Room
	4D	Carpet Mastic (Not Accessible)	Under Wood Plank Floor
	4E	Plaster	Limited @ Windows
	4F	Cloth Insulation	Very Small SW Corner (1 Square feet)
	4G	Black Mastic	Exterior
Building 5	5A	Drywall and Joint Compound	Office
	5B	Gray VFT with Yellow & Black Mastic	Office
	5C	Black Mastic	Roof Screws

Rooms and areas are shown in Figures 1 through 5  
 VFT - Vinyl Floor Tile  
 VSF - Vinyl Sheet Flooring

TABLE 2 - ASBESTOS SAMPLE RESULTS					
HA	Type of Material	Sample Number	Location	Asbestos Content	Estimated Quantity <sup>1</sup>
<b>Building 1</b>					
1A/ 1B	Drywall and Joint Compound (1A) with Tan Mastic (1B)	1A-1	Room 1	Tan Mastic = ND	---
				Joint Compound = <0.1% Chrysotile*	
				Drywall = ND	
		1A-2	Room 6	Tan Mastic = ND	
				Joint Compound = <0.1% Chrysotile*	
				Drywall = ND	
		1A-3	Room 7	Tan Mastic = ND	
				Joint Compound = <0.1% Chrysotile*	
				Drywall = ND	
1C	Spray-on Acoustic Ceiling	1C-1	Room 2	Acoustic Ceiling = ND	---
		1C-2	Room 3	Acoustic Ceiling = ND	
		1C-3	Room 7	Acoustic Ceiling = ND	
1D/ 1H	Gray VFT w/Yellow & Black Mastic (1D) & Off-white VFT w/Tan & Black Mastic (1H)	1D-1	Room 1	Blue Floor Tile = ND	1,240 SF
				Tan Mastic = ND	
				<b>Black Mastic = 2% Chrysotile</b>	
				Cream Floor Tile = ND	
				Tan Mastic = ND	
				<b>Black Mastic = 2% Chrysotile</b>	
		1D-2	Room 3	Blue Floor Tile = ND	
				Tan Mastic = ND	
				<b>Black Mastic = 2% Chrysotile</b>	
1D-3	Room 5	Blue Floor Tile = ND			
		Tan Mastic = ND			
		<b>Black Mastic = 2% Chrysotile</b>			
1E	Gray VSF with Tan Mastic	1E-1	Room 9	Gray VSF = ND	---
				Gray Vinyl Backing = ND	
				Tan Mastic = ND	
		1E-2	Room 9	Gray VSF = ND	
				Gray Vinyl Backing = ND	
				Tan Mastic = ND	
		1E-3	Room 9	Gray VSF = ND	
				Gray Vinyl Backing = ND	
				Tan Mastic = ND	



TABLE 2 - ASBESTOS SAMPLE RESULTS					
HA	Type of Material	Sample Number	Location	Asbestos Content	Estimated Quantity <sup>1</sup>
1F	Gray VFT with Yellow Mastic over White VFT with Yellow Mastic	1F-1	Room 10	Grey VFT = ND	---
				Tan Mastic = ND	
				White VFT = ND	
		1F-2	Room 10	Tan Mastic = ND	
				Grey VFT = ND	
				Tan Mastic = ND	
		1F-3	Room 10	White VFT = ND	
				Tan Mastic = ND	
				Grey VFT = ND	
1G	Stucco Plaster	1G-1	Exterior	Peach Stucco = ND	---
				Gray Stucco = ND	
		1G-2	Exterior	White Stucco = ND	
				Gray Stucco = ND	
		1G-3	Exterior	Peach Stucco = ND	
				Gray Stucco = ND	
1I	Roof Core	1I-1	Roof	Roof Material = ND	---
				Roof Felt = ND	
		1I-2	Roof	Roof Material = ND	
				Roof Felt = ND	
		1I-3	Roof	Roof Material = ND	
				Roof Felt = ND	
1J	Black Mastic	1J-1	Roof Penetrations	Black Mastic = ND	---
		1J-2	Roof Penetrations	Black Mastic = ND	
		1J-3	Roof Penetrations	Black Mastic = ND	
1K	Black Mastic	1K-1	Parapet Cap Screws	Black Mastic = ND	---
		1K-2	Parapet Cap Screws	Black Mastic = ND	
		1K-3	Parapet Cap Screws	Black Mastic = ND	
<b>Building 2</b>					
2A	Roof Core	2A-1	Roof	Roof Material = ND	---
				Roofing Mastic = ND	
		2A-2	Roof	Roof Material = ND	
				Roofing Mastic = ND	
		2A-3	Roof	Roof Material = ND	
				Roofing Mastic = ND	
2B	Black Mastic with Silver Paint	2B-1	Roof Vent	<b>Black Mastic = 3% Chrysotile</b>	<b>50 SF</b>
		2B-2	Roof Vent	<b>Black Mastic = 3% Chrysotile</b>	
		2B-3	Roof Vent	<b>Black Mastic = 3% Chrysotile</b>	

TABLE 2 - ASBESTOS SAMPLE RESULTS						
HA	Type of Material	Sample Number	Location	Asbestos Content	Estimated Quantity <sup>1</sup>	
2C	Tape with White Sealant	2C-1	Parapet Walls	Tape and Sealant = ND	---	
				Black Mastic = ND		
		2C-2	Parapet Walls	Tape and Sealant = ND		
2D	White Sealant with Silver Paint	2C-3	Parapet Walls	Tape and Sealant = ND	---	
				Black Mastic = ND		
		2D-1	Skylight	Sealant = ND		
		2D-2	Skylight	Sealant = ND		
		2D-3	Skylight	Sealant = ND		
				Black Mastic = ND		
<b>Building 3</b>						
3A	Roof Core	3A-1	Roof	Roof Material = ND	---	
						Roof Felt = ND
						Black Mastic = ND
		3A-2	Roof	Roof Material = ND		
				Roof Felt = ND		
				Black Mastic = ND		
3A-3	Roof	Roof Material = ND				
		Roof Felt = ND				
		Black Mastic = ND				
3B	Black Sealant	3B-1	Roof Seam	Sealant = ND	---	
						Black Mastic = ND
		3B-2	Roof Seam	Sealant = ND		
		3B-3	Roof Seam	Black Mastic = ND		
3C	Baseboard Mastic (Off-White)	3C-1	Throughout	Baseboard = ND	---	
						Mastic = ND
		3C-2	Throughout	Baseboard = ND		
		3C-3	Throughout	Mastic = ND		
3D	Tan VSF with Yellow Mastic	3D-1	Throughout	Baseboard = ND	---	
						Mastic = ND
		3D-2	Throughout	VSF = ND		
				Mastic = ND		
		3D-3	Throughout	VSF = ND		
				Mastic = ND		

TABLE 2 - ASBESTOS SAMPLE RESULTS					
HA	Type of Material	Sample Number	Location	Asbestos Content	Estimated Quantity <sup>1</sup>
<b>Building 4</b>					
4A	Drywall and Joint Compound	4A-1	Office	Joint Compound = ND Drywall = ND	---
		4A-2	Office	Joint Compound = ND Drywall = ND	
		4A-3	Office	Joint Compound = ND Joint Compound Mesh = ND Drywall = ND	
4B	Baseboard Mastic	4B-1	Office	White Mastic = ND Brown Fibrous Material = ND	---
		4B-2	Office	White Mastic = ND Brown Fibrous Material = ND Tan Mastic = ND	
		4B-3	Office	White Mastic = ND Brown Fibrous Material = ND Tan Mastic = ND	
4C	Ceiling Panel	4C-1	One Office	Ceiling Panel = ND	---
		4C-2	One Office	Ceiling Panel = ND	
		4C-3	One Office	Ceiling Panel = ND	
4F	Cloth Insulation	4F-1	SW Corner	Cloth Insulation = ND	---
4G	Black Mastic	4G-1	Exterior	Black Mastic = ND	---
		4G-2	Exterior	Black Mastic = ND	
		4G-3	Exterior	Black Mastic = ND	
<b>Building 5</b>					
5A	Drywall and Joint Compound with Texture	5A-1	Office	Joint Compound = ND Drywall = ND	---
		5A-2	Office	Joint Compound = ND Drywall = ND	
		5A-3	Office	Joint Compound = ND Drywall = ND	
5B	Gray VFT with Yellow Mastic	5B-1	Office	Blue/Gray Floor Tile = ND Yellow Mastic Black Mastic = ND	---
		5B-2	Office	Blue/Gray Floor Tile = ND Yellow Mastic Black Mastic = ND	
		5B-3	Office	Blue/Gray Floor Tile = ND Yellow Mastic Black Mastic = ND	

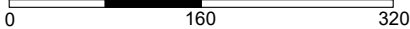
<b>TABLE 2 - ASBESTOS SAMPLE RESULTS</b>					
<b>HA</b>	<b>Type of Material</b>	<b>Sample Number</b>	<b>Location</b>	<b>Asbestos Content</b>	<b>Estimated Quantity<sup>1</sup></b>
5C	Black Mastic with Silver Paint	5C-1	Roof Screws	<b>Black Mastic = 2% Chrysotile</b>	150 SF
		5C-2	Roof Screws	<b>Black Mastic = 2% Chrysotile</b>	
		5C-3	Roof Screws	<b>Black Mastic = 2% Chrysotile</b>	
<p>1 = Quantities are estimates only. It is the responsibility of the contractor to verify locations and quantities.                      HA = Homogeneous Area (see Table 1)                      VFT = Vinyl Floor Tile                      VSF = Vinyl Sheet Flooring                      ND = Not Detected                      * - Sample analyzed by EPA Point Count 1,000 Method                      SF = Square Feet                      --- = Quantity not given because asbestos not present of below regulated concentration.                      Bulk sample locations shown on Figures 1 through 5</p>					

**LEGEND**

- - - - - Approximate Site Boundary
- 1 Building Number



APPROXIMATE SCALE, FEET



NOTE: DIMENSIONS, DIRECTIONS AND LOCATIONS ARE APPROXIMATE.



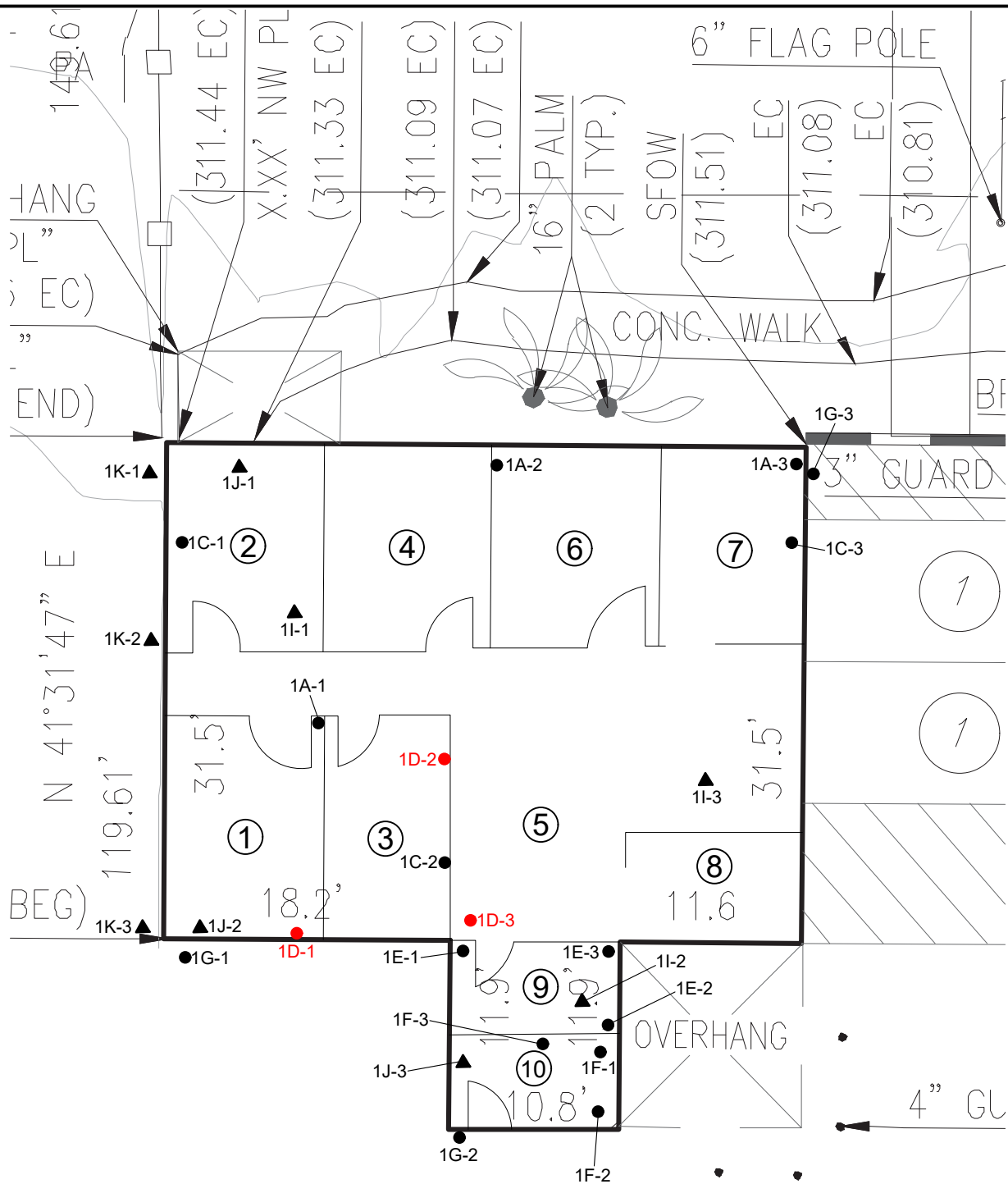
PROJECT NO.  
101278004

DATE  
04/23

SITE PLAN

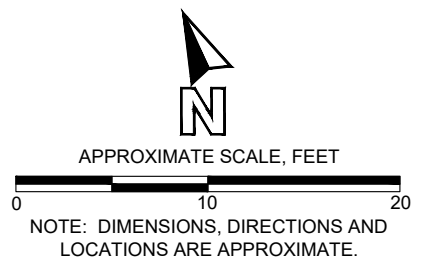
15006, 15010 AND 15100 NELSON AVENUE  
CITY OF INDUSTRY CALIFORNIA

FIGURE  
**1**



**LEGEND**

- 1G-1 Sample Location and Designation  
(Red Where Positive for Asbestos)
- ▲ 1I-1 Roof Sample Location and Designation  
(Red Where Positive for Asbestos)
- ① Room Number



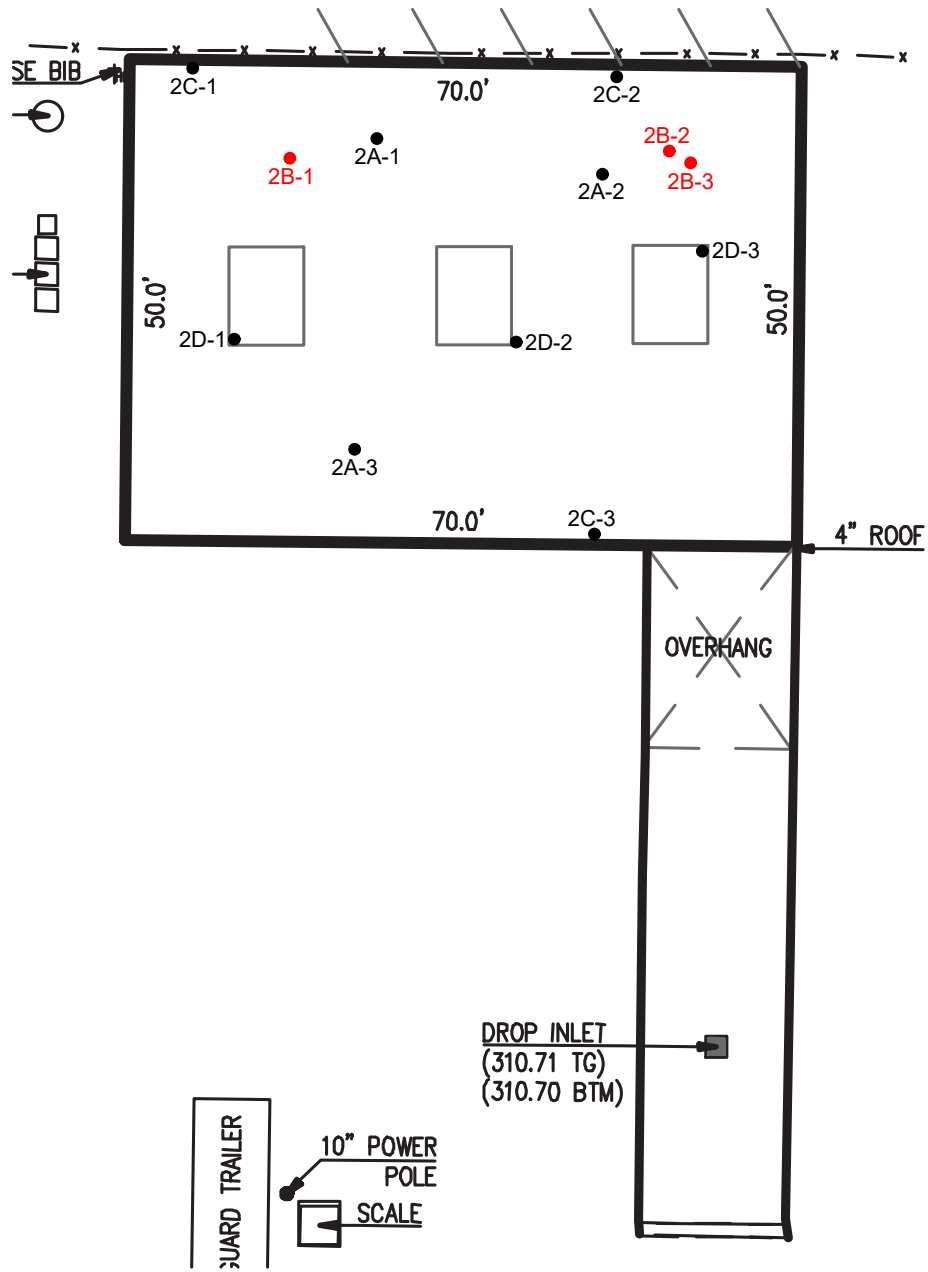
PROJECT NO.  
101278004

DATE  
04/23

SAMPLE LOCATION MAP - BUILDING 1

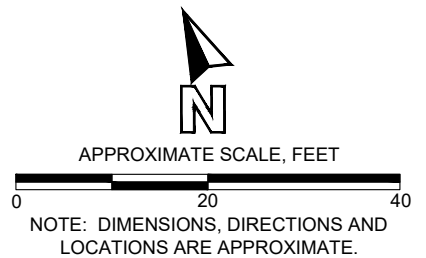
15006, 15010 AND 15100 NELSON AVENUE  
CITY OF INDUSTRY CALIFORNIA

FIGURE  
2

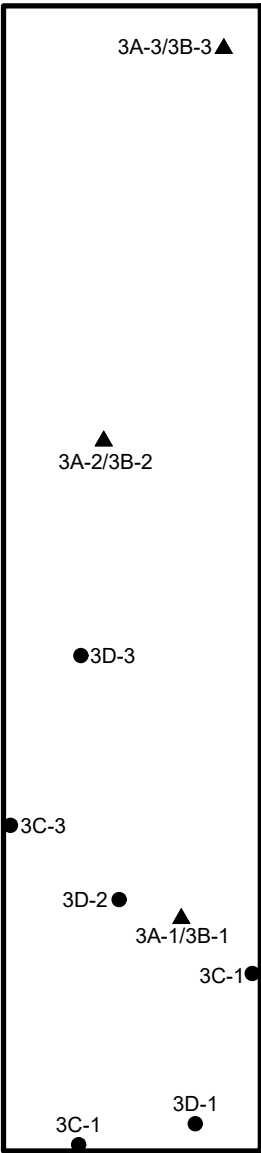


**LEGEND**

● 2A-1 Sample Location and Designation  
 (Red Where Positive for Asbestos)

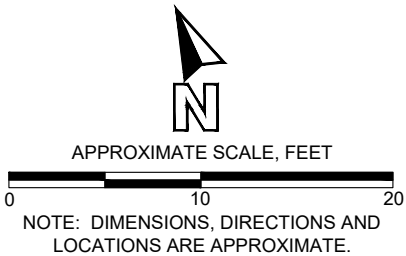


	PROJECT NO. 101278004	SAMPLE LOCATION MAP - BUILDING 2  15006, 15010 AND 15100 NELSON AVENUE CITY OF INDUSTRY CALIFORNIA	FIGURE <b>3</b>
	DATE 04/23		



**LEGEND**

- Sample Location and Designation  
(Red Where Positive for Asbestos)
- ▲ Roof Sample Location and Designation  
(Red Where Positive for Asbestos)

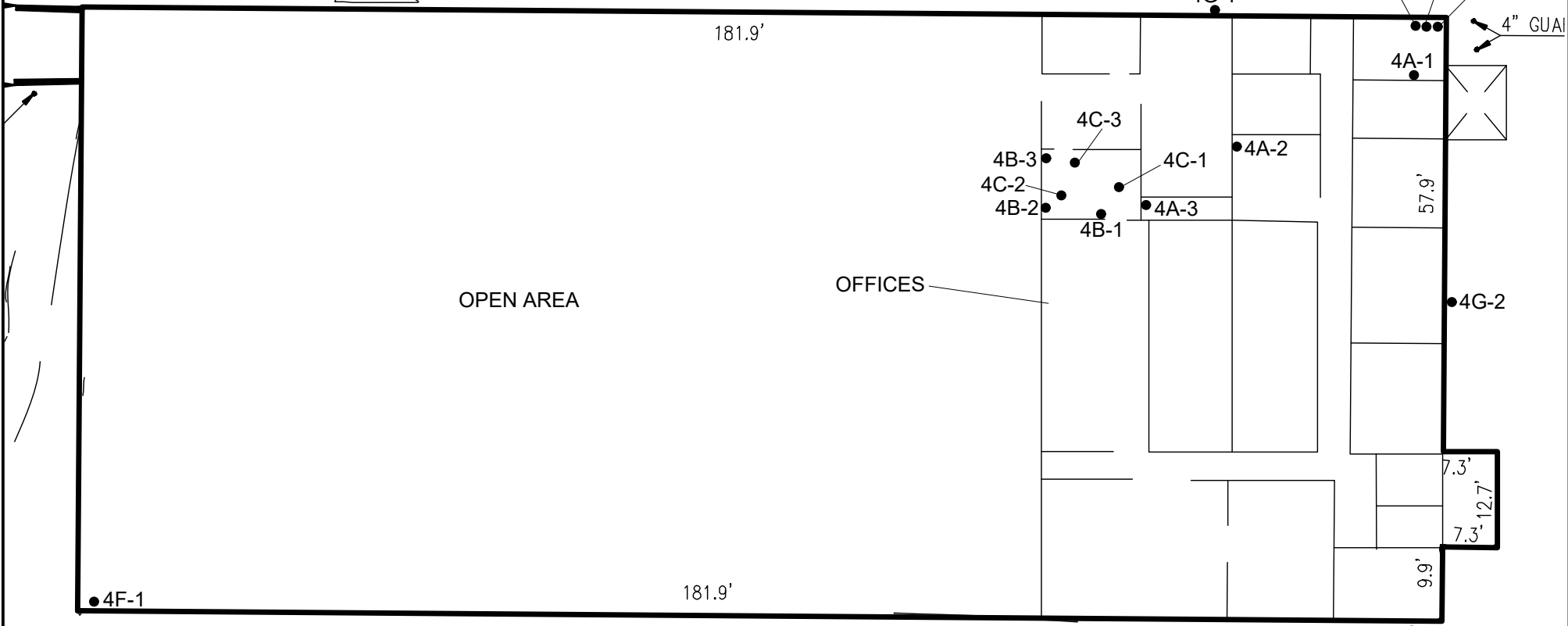




(511.11' E)  
3.93' NW

0.71 FS)

LOT LIGHT

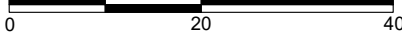


**LEGEND**

● Sample Location and Designation  
(Red Where Positive for Asbestos)



APPROXIMATE SCALE, FEET



NOTE: DIMENSIONS, DIRECTIONS AND LOCATIONS ARE APPROXIMATE.



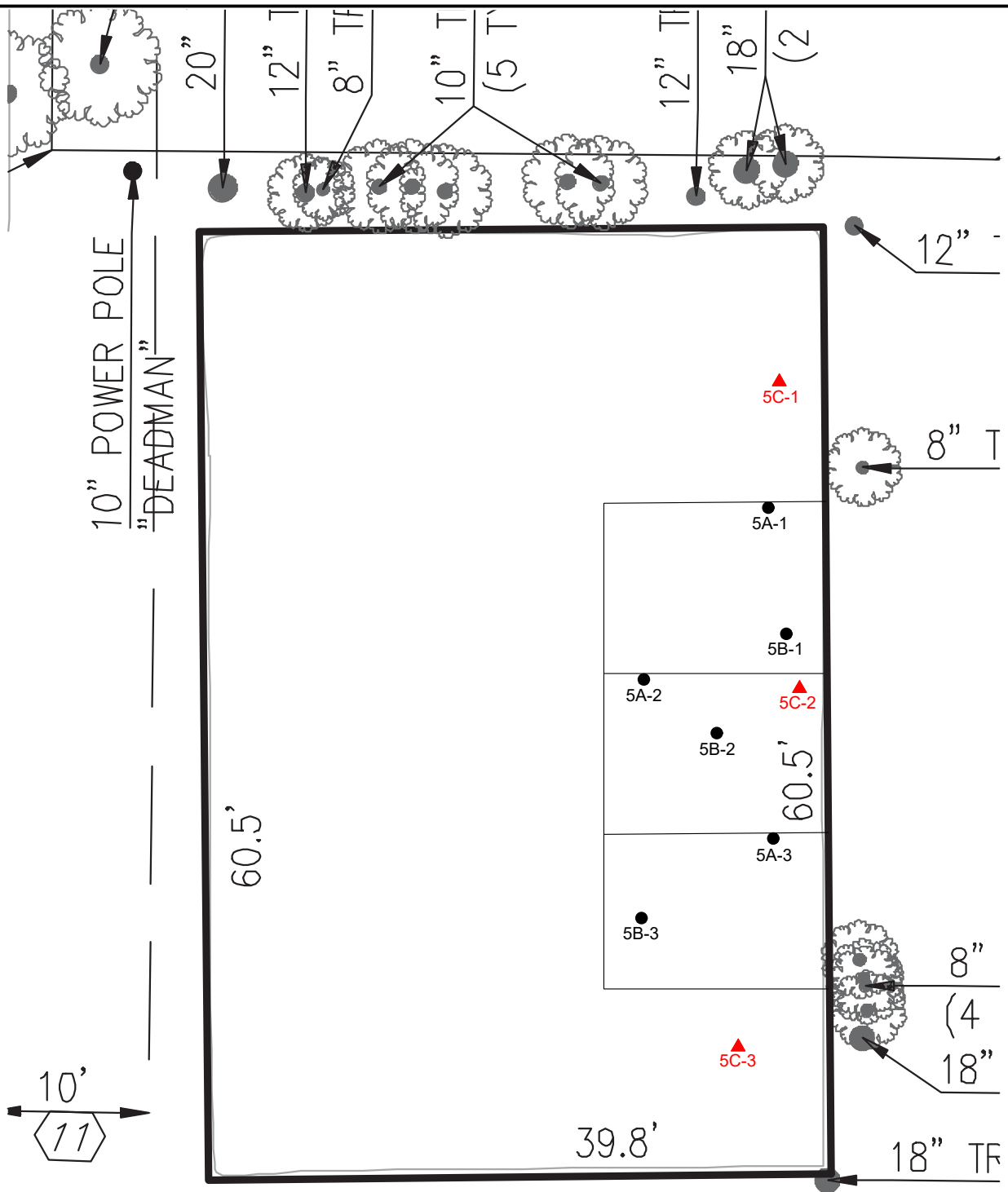
PROJECT NO.  
101278004

DATE  
04/23

SAMPLE LOCATION MAP - BUILDING 4

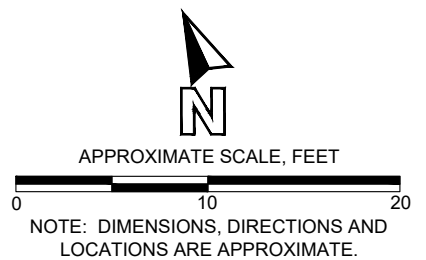
15006, 15010 AND 15100 NELSON AVENUE  
CITY OF INDUSTRY CALIFORNIA

FIGURE  
**5**



**LEGEND**

- 5A-1 Sample Location and Designation (Red Where Positive for Asbestos)
- ▲ 5C-1 Roof Sample Location and Designation (Red Where Positive for Asbestos)



**ATTACHMENT A**  
**LABORATORY REPORTS**



2556 W Woodland Dr Anaheim, CA 92801

**BULK ASBESTOS FIBER ANALYSIS**  
BY POLARIZED LIGHT MICROSCOPY



**Client Name:** Ardent Environmental Group, Inc  
**Project Manager:** Craig Metheny  
**Client Address:** 1827 Capital Street, Suite 103,  
 Corona, CA 92880  
**Project Number:** 101278004  
**Project Location:** 15006 -15100 Nelson Ave, City of  
 Industry

**Lab Batch Number:** 2215000  
**Samples Submitted:** 22  
**Samples Analyzed:** 22  
**Analysis Method:** EPA 600/R-93-116 &  
 EPA 600/M4-82-020

**Lab ID: 221500001**

**Client ID: 1A-1**

Layer	Layer Description	Asbestos Type %	Other Fibrous Material %	Other Non Fibrous Material
1.	Tan gummy mastic	None Detected	None Detected	Mastic/Binder
2.	Cream compacted powdery material	Chrysotile <1%	None Detected	JC/Binder
3.	White chalky material with paper	None Detected	Cellulose 6%	Gypsum/Binder

**Lab ID: 221500002**

**Client ID: 1A-2**

Layer	Layer Description	Asbestos Type %	Other Fibrous Material %	Other Non Fibrous Material
1.	Tan gummy mastic	None Detected	None Detected	Mastic/Binder
2.	Cream compacted powdery material with paint	Chrysotile <1%	None Detected	JC/Binder, Paint
3.	White chalky material with paper	None Detected	Cellulose 6%	Gypsum/Binder

**Lab ID: 221500003**

**Client ID: 1A-3**

Layer	Layer Description	Asbestos Type %	Other Fibrous Material %	Other Non Fibrous Material
1.	Tan gummy mastic	None Detected	None Detected	Mastic/Binder
2.	Cream compacted powdery material with paint	Chrysotile <1%	None Detected	JC/Binder, Paint
3.	White chalky material with paper	None Detected	Cellulose 6%	Gypsum/Binder

**Lab ID: 221500004**

**Client ID: 1C-1**

Layer	Layer Description	Asbestos Type %	Other Fibrous Material %	Other Non Fibrous Material
1.	White lumpy foamy material with paint	None Detected	None Detected	Binder/Filler, Paint



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**BULK ASBESTOS FIBER ANALYSIS**  
BY POLARIZED LIGHT MICROSCOPY



**Client Name:** Ardent Environmental Group, Inc  
**Project Manager:** Craig Metheny  
**Client Address:** 1827 Capital Street, Suite 103,  
 Corona, CA 92880  
**Project Number:** 101278004  
**Project Location:** 15006 -15100 Nelson Ave, City of  
 Industry

**Lab Batch Number:** 2215000  
**Samples Submitted:** 22  
**Samples Analyzed:** 22  
**Analysis Method:** EPA 600/R-93-116 &  
 EPA 600/M4-82-020

**Lab ID:** 221500005

**Client ID:** 1C-2

Layer	Layer Description	Asbestos Type %	Other Fibrous Material %	Other Non Fibrous Material
1.	White lumpy foamy material with paint	None Detected	None Detected	Binder/Filler, Paint

**Lab ID:** 221500006

**Client ID:** 1C-3

Layer	Layer Description	Asbestos Type %	Other Fibrous Material %	Other Non Fibrous Material
1.	White lumpy foamy material with paint	None Detected	None Detected	Binder/Filler, Paint

**Lab ID:** 221500007

**Client ID:** 1D-1

Layer	Layer Description	Asbestos Type %	Other Fibrous Material %	Other Non Fibrous Material
1.	Blue floor tile	None Detected	None Detected	Binder/Filler
2.	Tan mastic	None Detected	None Detected	Mastic/Binder
3.	Black asphaltic mastic	Chrysotile 2%	None Detected	Asphalt/Binder
4.	Cream floor tile	None Detected	None Detected	Binder/Filler
5.	Tan mastic	None Detected	None Detected	Mastic/Binder
6.	Black asphaltic mastic	Chrysotile 2%	None Detected	Asphalt/Binder

**Lab ID:** 221500008

**Client ID:** 1D-2

Layer	Layer Description	Asbestos Type %	Other Fibrous Material %	Other Non Fibrous Material
1.	Blue floor tile	None Detected	None Detected	Binder/Filler
2.	Tan mastic	None Detected	None Detected	Mastic/Binder
3.	Black asphaltic mastic	Chrysotile 2%	None Detected	Asphalt/Binder



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**BULK ASBESTOS FIBER ANALYSIS**  
BY POLARIZED LIGHT MICROSCOPY

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TESTING  
NVLAP LAB CODE 500079-0  
Phone: (562) 860-2201  
www.aihlab.com

**Client Name:** Ardent Environmental Group, Inc  
**Project Manager:** Craig Metheny  
**Client Address:** 1827 Capital Street, Suite 103,  
Corona, CA 92880  
**Project Number:** 101278004  
**Project Location:** 15006 -15100 Nelson Ave, City of  
Industry

**Lab Batch Number:** 2215000  
**Samples Submitted:** 22  
**Samples Analyzed:** 22  
**Analysis Method:** EPA 600/R-93-116 &  
EPA 600/M4-82-020

**Lab ID:** 221500009

**Client ID:** 1D-3

Layer	Layer Description	Asbestos Type %	Other Fibrous Material %	Other Non Fibrous Material
1.	Blue floor tile	None Detected	None Detected	Binder/Filler
2.	Tan mastic	None Detected	None Detected	Mastic/Binder
3.	Black asphaltic mastic	Chrysotile 2%	None Detected	Asphalt/Binder

**Lab ID:** 221500010

**Client ID:** 1E-1

Layer	Layer Description	Asbestos Type %	Other Fibrous Material %	Other Non Fibrous Material
1.	Grey vinyl material	None Detected	None Detected	Vinyl/Binder
2.	Grey fibrous backing	None Detected	Cellulose 50%, Glass Fibers 5%, Synthetic Fibers 5%	Binder/Filler
3.	Tan mastic	None Detected	None Detected	Mastic/Binder

**Lab ID:** 221500011

**Client ID:** 1E-2

Layer	Layer Description	Asbestos Type %	Other Fibrous Material %	Other Non Fibrous Material
1.	Grey vinyl material	None Detected	None Detected	Vinyl/Binder
2.	Grey fibrous backing	None Detected	Cellulose 50%, Glass Fibers 5%, Synthetic Fibers 5%	Binder/Filler
3.	Tan mastic	None Detected	None Detected	Mastic/Binder





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**Project Manager:** Craig Metheny  
**Client Address:** 1827 Capital Street, Suite 103,  
Corona, CA 92880  
**Project Number:** 101278004  
**Project Location:** 15006 -15100 Nelson Ave, City of  
Industry

**Lab Batch Number:** 2215000  
**Samples Submitted:** 22  
**Samples Analyzed:** 22  
**Analysis Method:** EPA 600/R-93-116 &  
EPA 600/M4-82-020

**Lab ID:** 221500012

**Client ID:** 1E-3

Layer	Layer Description	Asbestos Type %	Other Fibrous Material %	Other Non Fibrous Material
1.	Grey vinyl material	None Detected	None Detected	Vinyl/Binder
2.	Grey fibrous backing	None Detected	Cellulose 50%, Glass Fibers 5%, Synthetic Fibers 5%	Binder/Filler
3.	Tan mastic	None Detected	None Detected	Mastic/Binder

**Lab ID:** 221500013

**Client ID:** 1F-1

Layer	Layer Description	Asbestos Type %	Other Fibrous Material %	Other Non Fibrous Material
1.	Grey floor tile	None Detected	None Detected	Binder/Filler
2.	Tan adhesive	None Detected	None Detected	Mastic/Binder
3.	White floor tile	None Detected	None Detected	Binder/Filler
4.	Tan adhesive	None Detected	None Detected	Mastic/Binder

**Lab ID:** 221500014

**Client ID:** 1F-2

Layer	Layer Description	Asbestos Type %	Other Fibrous Material %	Other Non Fibrous Material
1.	Grey floor tile	None Detected	None Detected	Binder/Filler
2.	Tan adhesive	None Detected	None Detected	Mastic/Binder
3.	White floor tile	None Detected	None Detected	Binder/Filler
4.	Tan adhesive	None Detected	None Detected	Mastic/Binder



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www.aihlab.com

**Client Name:** Ardent Environmental Group, Inc  
**Project Manager:** Craig Metheny  
**Client Address:** 1827 Capital Street, Suite 103,  
Corona, CA 92880  
**Project Number:** 101278004  
**Project Location:** 15006 -15100 Nelson Ave, City of  
Industry

**Lab Batch Number:** 2215000  
**Samples Submitted:** 22  
**Samples Analyzed:** 22  
**Analysis Method:** EPA 600/R-93-116 &  
EPA 600/M4-82-020

**Lab ID: 221500015**

**Client ID: 1F-3**

Layer	Layer Description	Asbestos Type %	Other Fibrous Material %	Other Non Fibrous Material
1.	Grey floor tile	None Detected	None Detected	Binder/Filler
2.	Tan adhesive	None Detected	None Detected	Mastic/Binder
3.	White floor tile	None Detected	None Detected	Binder/Filler
4.	Tan adhesive	None Detected	None Detected	Mastic/Binder

**Lab ID: 221500016**

**Client ID: 1G-1**

Layer	Layer Description	Asbestos Type %	Other Fibrous Material %	Other Non Fibrous Material
1.	Peach sandy material with paint	None Detected	Cellulose <1%	Binder/Filler, Paint
2.	Grey sandy material	None Detected	Cellulose <1%	Binder/Filler, Mineral Grains

**Lab ID: 221500017**

**Client ID: 1G-2**

Layer	Layer Description	Asbestos Type %	Other Fibrous Material %	Other Non Fibrous Material
1.	White sandy material with paint	None Detected	Cellulose <1%	Binder/Filler, Paint
2.	Grey sandy material	None Detected	Cellulose <1%	Binder/Filler, Mineral Grains

**Lab ID: 221500018**

**Client ID: 1G-3**

Layer	Layer Description	Asbestos Type %	Other Fibrous Material %	Other Non Fibrous Material
1.	Peach sandy material with paint	None Detected	Cellulose <1%	Binder/Filler, Paint
2.	Grey sandy material	None Detected	Cellulose <1%	Binder/Filler, Mineral Grains





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**Client Name:** Ardent Environmental Group, Inc  
**Project Manager:** Craig Metheny  
**Client Address:** 1827 Capital Street, Suite 103,  
Corona, CA 92880  
**Project Number:** 101278004  
**Project Location:** 15006 -15100 Nelson Ave, City of  
Industry

**Lab Batch Number:** 2215000  
**Samples Submitted:** 22  
**Samples Analyzed:** 22  
**Analysis Method:** EPA 600/R-93-116 &  
EPA 600/M4-82-020

**Lab ID: 221500019**

**Client ID: 11-1**

Layer	Layer Description	Asbestos Type %	Other Fibrous Material %	Other Non Fibrous Material
1.	Black fibrous asphaltic material with granules	None Detected	Synthetic Fibers 20%	Asphalt/Binder, Mineral Grains
2.	Black fibrous asphaltic felt	None Detected	Glass Fibers 40%	Asphalt/Binder

**Lab ID: 221500020**

**Client ID: 11-2**

Layer	Layer Description	Asbestos Type %	Other Fibrous Material %	Other Non Fibrous Material
1.	Black fibrous asphaltic material with granules	None Detected	Synthetic Fibers 20%	Asphalt/Binder, Mineral Grains
2.	Black fibrous asphaltic felt	None Detected	Glass Fibers 40%	Asphalt/Binder

**Lab ID: 221500021**

**Client ID: 11-3**

Layer	Layer Description	Asbestos Type %	Other Fibrous Material %	Other Non Fibrous Material
1.	Black fibrous asphaltic material with granules	None Detected	Synthetic Fibers 20%	Asphalt/Binder, Mineral Grains
2.	Black fibrous asphaltic felt	None Detected	Glass Fibers 40%	Asphalt/Binder

**Lab ID: 221500022**

**Client ID: 1J-1**

Layer	Layer Description	Asbestos Type %	Other Fibrous Material %	Other Non Fibrous Material
1.	Black asphaltic mastic with granules	None Detected	Cellulose 3%	Asphalt/Binder, Mineral Grains





2556 W Woodland Dr Anaheim, CA 92801

# BULK ASBESTOS FIBER ANALYSIS


BY POLARIZED LIGHT MICROSCOPY



**Client Name:** Ardent Environmental Group, Inc  
**Project Manager:** Craig Metheny  
**Client Address:** 1827 Capital Street, Suite 103,  
Corona, CA 92880  
**Project Number:** 101278004  
**Project Location:** 15006 -15100 Nelson Ave, City of  
Industry

**Lab Batch Number:** 2215000  
**Samples Submitted:** 22  
**Samples Analyzed:** 22  
**Analysis Method:** EPA 600/R-93-116 &  
EPA 600/M4-82-020

**Analyzed by:** Don Nguyen

**Signature:** 

**Date:** 08-29-2022

**Reviewed by:** Zubair Ahmed

**Signature:** 

**Date:** 08-29-2022

Reporting limit is 1%. If the sample was not collected by AIH Laboratory then the accuracy of the results is limited by the methodology and experience of the sample collector. Clients can verify specific reporting limit requirement from local regulatory agencies. Liability limited to cost of samples analysis. This report shall not be reproduced except in full, without written approval of AIH Laboratory. It shall not be used to claim product endorsement by NVLAP or any other agency of the government. Reported results relate only to the samples tested and may not be the representative of the sample area. AIH Laboratory shall dispose of the Customer's samples 14 days after receiving the samples unless instructed to store them for an alternate period of time in writing.





2215000

CHAIN OF CUSTODY

2556 W Woodland Dr Anaheim, CA 92801

Phone: (562) 860-2201  
www.aihlab.com

Lab Batch Number:		Number Of Samples:	79
Client Name:	Ardent Environmental Group	Project Number:	101278004
Client Address:	1827 Capital St, #103 Corona, CA 92878	Project Location:	15006 - 15100 Nelson Ave City of Industry
Project Manager:	Craig Metheny	Turnaround Time:	<input type="checkbox"/> 1 hour <input type="checkbox"/> 24 hours <input type="checkbox"/> 2 hours <input checked="" type="checkbox"/> 2 days <input type="checkbox"/> 4 hours <input type="checkbox"/> 3 days <input type="checkbox"/> 8 hours <input type="checkbox"/> 5 days
Work Phone:	951-736-5334    Ext:	Delivery:	<input type="checkbox"/> Rush
Cell Phone:	951-751-2996	Reporting Method:	<input checked="" type="checkbox"/> Email <input checked="" type="checkbox"/> Call Main Phone <input checked="" type="checkbox"/> Fax
Email:	cmetheny@ardentenv.com	Ref#:	
Fax:		Special Instructions:	
Asbestos Air PCM:	<input type="checkbox"/> NIOSH 7400 <input type="checkbox"/> NIOSH 7400 B Rules (Fiber Glass)		
Asbestos Bulk:	<input checked="" type="checkbox"/> PLM(EPA 600/R-93-116) <----Check this for asbestos testing		
Asbestos Bulk Point Count:	<input type="checkbox"/> PLM(EPA 600/R-93-116)    Counts: <input type="checkbox"/> 400 <input type="checkbox"/> 1000 <input type="checkbox"/> Other: _____		
Rotameters:	<input type="checkbox"/> Lead <input type="checkbox"/> PCM		

Seq#	Client Sample ID	A/R	Description / Location / Comments
1			
2			
3			
4			
5			
6			
7			
8			
9			
10			
11			
12			
13			
14			
15			

Signature	Print Name	Signature	Company	Date	Time
	Craig Metheny		Ardent Env.	8/16/22	
	Craig Metheny		Ardent Env.	8/16/22	

For Lab Use Only					
Received by:	Print Name	Signature	Company	Date	Time
Received by:	Army Nguyen		AIH Laboratory	8/26/22	2:37 pm
Analyzed by:			AIH Laboratory		
Reported by:			AIH Laboratory		

# 2215000

Project Name \_\_\_\_\_  
 Project No. \_\_\_\_\_  
 Sampler \_\_\_\_\_  
 Date \_\_\_\_\_

## Asbestos Bulk Sample Log

Sample #	HA	Description	Location	Condition/Notes
1	IA-1	IA/IB	AW/SC w/Tan Mastix	Rm 1
2	IA-2	↓	↓	Rm 6
3	IA-3	↓	↓	Rm 7
4	IC-1	IC	Spray-on Acoustic Ceiling	Rm 2
5	IC-2	↓	↓	Rm 3
6	IC-3	↓	↓	Rm 7
7	ID-1	<del>ID-1H</del>	Gray VFT w/Yell. Mastix over	RM 1
8	ID-2	<del>ID-2H</del>	off white VFT w/ <sup>Brown Mastix</sup> Gray VFT w/Yell/Blk mastix	
9	ID-3	ID-3	Gray VFT w/Yell & Blk Mastix	Rm 5
10	IE-1	IE	Gray USF w/tan mastix	Rm 9
11	IE-2	↓	↓	↓
12	IE-3	↓	↓	↓
13	IF-1	IF	Gray VFT w/Yellow mastix over white VFT w/Yell-mastix	Rm 10
14	IF-2	↓	↓	↓
15	IF-3	↓	↓	↓
16	IG-1	IG	Stucco Plaster	Exterior
17	IG-2	↓	↓	↓
18	IG-3	↓	↓	↓
19	IA-1	IA	<del>Roof Core</del>	Roof
20	IA-2	↓	↓	↓
21	IA-3	↓	↓	↓
22	II-1	II	Roof Core	Roof
23	II-2	↓	↓	↓
24	II-3	↓	↓	↓
25	IJ-1	IJ	Black Mastix	Roof Penetration

Received by: Amy Urygen 8/21/2012 2:37 PM



2556 W Woodland Dr Anaheim, CA 92801

**BULK ASBESTOS FIBER ANALYSIS**  
BY POLARIZED LIGHT MICROSCOPY



Phone: (562) 860-2201  
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**Client Name:** Ardent Environmental Group, Inc  
**Project Manager:** Craig Metheny  
**Client Address:** 1827 Capital Street, Suite 103,  
Corona, CA 92880  
**Project Number:** 101278004  
**Project Location:** 15006 -15100 Nelson Ave, City of  
Industry

**Lab Batch Number:** 2215001  
**Samples Submitted:** 24  
**Samples Analyzed:** 24  
**Analysis Method:** EPA 600/R-93-116 &  
EPA 600/M4-82-020

**Lab ID: 221500101**

**Client ID: 1J-2**

Layer	Layer Description	Asbestos Type %	Other Fibrous Material %	Other Non Fibrous Material
1.	Black asphaltic mastic with granules	None Detected	Cellulose 3%	Asphalt/Binder, Mineral Grains

**Lab ID: 221500102**

**Client ID: 1J-3**

Layer	Layer Description	Asbestos Type %	Other Fibrous Material %	Other Non Fibrous Material
1.	Black asphaltic mastic with granules	None Detected	Cellulose 3%	Asphalt/Binder, Mineral Grains

**Lab ID: 221500103**

**Client ID: 1K-1**

Layer	Layer Description	Asbestos Type %	Other Fibrous Material %	Other Non Fibrous Material
1.	Black asphaltic mastic	None Detected	Cellulose 3%	Asphalt/Binder

**Lab ID: 221500104**

**Client ID: 1K-2**

Layer	Layer Description	Asbestos Type %	Other Fibrous Material %	Other Non Fibrous Material
1.	Black asphaltic mastic	None Detected	Cellulose 3%	Asphalt/Binder

**Lab ID: 221500105**

**Client ID: 1K-3**

Layer	Layer Description	Asbestos Type %	Other Fibrous Material %	Other Non Fibrous Material
1.	Black asphaltic mastic	None Detected	Cellulose 3%	Asphalt/Binder

**Lab ID: 221500106**

**Client ID: 2A-1**

Layer	Layer Description	Asbestos Type %	Other Fibrous Material %	Other Non Fibrous Material
1.	Black fibrous asphaltic material with granules	None Detected	Glass Fibers 10%	Asphalt/Binder, Mineral Grains
2.	Black asphaltic material	None Detected	Glass Fibers 2%	Asphalt/Binder



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**BULK ASBESTOS FIBER ANALYSIS**  
BY POLARIZED LIGHT MICROSCOPY



**Client Name:** Ardent Environmental Group, Inc  
**Project Manager:** Craig Metheny  
**Client Address:** 1827 Capital Street, Suite 103,  
 Corona, CA 92880  
**Project Number:** 101278004  
**Project Location:** 15006 -15100 Nelson Ave, City of  
 Industry

**Lab Batch Number:** 2215001  
**Samples Submitted:** 24  
**Samples Analyzed:** 24  
**Analysis Method:** EPA 600/R-93-116 &  
 EPA 600/M4-82-020

**Lab ID: 221500107**

**Client ID: 2A-2**

Layer	Layer Description	Asbestos Type %	Other Fibrous Material %	Other Non Fibrous Material
1.	Black fibrous asphaltic material with granules	None Detected	Glass Fibers 10%	Asphalt/Binder, Mineral Grains
2.	Black asphaltic material	None Detected	Glass Fibers 2%	Asphalt/Binder

**Lab ID: 221500108**

**Client ID: 2A-3**

Layer	Layer Description	Asbestos Type %	Other Fibrous Material %	Other Non Fibrous Material
1.	Black fibrous asphaltic material with granules	None Detected	Glass Fibers 10%	Asphalt/Binder, Mineral Grains
2.	Black asphaltic material	None Detected	Glass Fibers 2%	Asphalt/Binder

**Lab ID: 221500109**

**Client ID: 2B-1**

Layer	Layer Description	Asbestos Type %	Other Fibrous Material %	Other Non Fibrous Material
1.	Black asphaltic mastic	Chrysotile 2%	None Detected	Asphalt/Binder

**Lab ID: 221500110**

**Client ID: 2B-2**

Layer	Layer Description	Asbestos Type %	Other Fibrous Material %	Other Non Fibrous Material
1.	Black asphaltic mastic	Chrysotile 2%	None Detected	Asphalt/Binder

**Lab ID: 221500111**

**Client ID: 2B-3**

Layer	Layer Description	Asbestos Type %	Other Fibrous Material %	Other Non Fibrous Material
1.	Black asphaltic mastic	Chrysotile 2%	None Detected	Asphalt/Binder



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NVLAP LAB CODE 500079-0  
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**Client Name:** Ardent Environmental Group, Inc  
**Project Manager:** Craig Metheny  
**Client Address:** 1827 Capital Street, Suite 103,  
Corona, CA 92880  
**Project Number:** 101278004  
**Project Location:** 15006 -15100 Nelson Ave, City of  
Industry

**Lab Batch Number:** 2215001  
**Samples Submitted:** 24  
**Samples Analyzed:** 24  
**Analysis Method:** EPA 600/R-93-116 &  
EPA 600/M4-82-020

**Lab ID: 221500112**

**Client ID: 2C-1**

Layer	Layer Description	Asbestos Type %	Other Fibrous Material %	Other Non Fibrous Material
1.	White woven fibrous material with white rubbery coating	None Detected	Synthetic Fibers 90%	Binder/Filler
2.	Trace or black asphaltic mastic	None Detected	None Detected	Asphalt/Binder

**Lab ID: 221500113**

**Client ID: 2C-2**

Layer	Layer Description	Asbestos Type %	Other Fibrous Material %	Other Non Fibrous Material
1.	White woven fibrous material with white rubbery coating	None Detected	Synthetic Fibers 90%	Binder/Filler

**Lab ID: 221500114**

**Client ID: 2C-3**

Layer	Layer Description	Asbestos Type %	Other Fibrous Material %	Other Non Fibrous Material
1.	White woven fibrous material with white rubbery coating	None Detected	Synthetic Fibers 90%	Binder/Filler
2.	Trace or black asphaltic mastic	None Detected	None Detected	Asphalt/Binder

**Lab ID: 221500115**

**Client ID: 2D-1**

Layer	Layer Description	Asbestos Type %	Other Fibrous Material %	Other Non Fibrous Material
1.	White rubbery material with granules and silver coating	None Detected	None Detected	Binder/Filler, Mineral Grains

**Lab ID: 221500116**

**Client ID: 2D-2**

Layer	Layer Description	Asbestos Type %	Other Fibrous Material %	Other Non Fibrous Material
1.	White rubbery material with granules and silver coating	None Detected	None Detected	Binder/Filler, Mineral Grains



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**Client Name:** Ardent Environmental Group, Inc  
**Project Manager:** Craig Metheny  
**Client Address:** 1827 Capital Street, Suite 103,  
Corona, CA 92880  
**Project Number:** 101278004  
**Project Location:** 15006 -15100 Nelson Ave, City of  
Industry

**Lab Batch Number:** 2215001  
**Samples Submitted:** 24  
**Samples Analyzed:** 24  
**Analysis Method:** EPA 600/R-93-116 &  
EPA 600/M4-82-020

**Lab ID: 221500117**

**Client ID: 2D-3**

Layer	Layer Description	Asbestos Type %	Other Fibrous Material %	Other Non Fibrous Material
1.	White rubbery material with silver coating	None Detected	None Detected	Binder/Filler, Mineral Grains
2.	Trace of black asphaltic material	None Detected	None Detected	Asphalt/Binder

**Lab ID: 221500118**

**Client ID: 3A-1**

Layer	Layer Description	Asbestos Type %	Other Fibrous Material %	Other Non Fibrous Material
1.	Black fibrous asphaltic material with granules	None Detected	Glass Fibers 10%	Asphalt/Binder, Mineral Grains
2.	Black fibrous asphaltic felt	None Detected	Cellulose 60%	Asphalt/Binder
3.	Black asphaltic mastic	None Detected	Cellulose 3%	Asphalt/Binder

**Lab ID: 221500119**

**Client ID: 3A-2**

Layer	Layer Description	Asbestos Type %	Other Fibrous Material %	Other Non Fibrous Material
1.	Black fibrous asphaltic material with granules	None Detected	Glass Fibers 10%	Asphalt/Binder, Mineral Grains
2.	Black fibrous asphaltic felt	None Detected	Cellulose 60%	Asphalt/Binder
3.	Black asphaltic mastic	None Detected	Cellulose 3%	Asphalt/Binder

**Lab ID: 221500120**

**Client ID: 3A-3**

Layer	Layer Description	Asbestos Type %	Other Fibrous Material %	Other Non Fibrous Material
1.	Black fibrous asphaltic material with granules	None Detected	Glass Fibers 10%	Asphalt/Binder, Mineral Grains
2.	Black fibrous asphaltic felt	None Detected	Cellulose 60%	Asphalt/Binder
3.	Trace of black asphaltic mastic	None Detected	Cellulose 3%	Asphalt/Binder





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**Project Manager:** Craig Metheny  
**Client Address:** 1827 Capital Street, Suite 103,  
 Corona, CA 92880  
**Project Number:** 101278004  
**Project Location:** 15006 -15100 Nelson Ave, City of  
 Industry

**Lab Batch Number:** 2215001  
**Samples Submitted:** 24  
**Samples Analyzed:** 24  
**Analysis Method:** EPA 600/R-93-116 &  
 EPA 600/M4-82-020

**Lab ID: 221500121**

**Client ID: 3B-1**

Layer	Layer Description	Asbestos Type %	Other Fibrous Material %	Other Non Fibrous Material
1.	Black fibrous asphaltic material with granules	None Detected	Glass Fibers 10%	Asphalt/Binder, Mineral Grains
2.	Black asphaltic mastic	None Detected	None Detected	Asphalt/Binder

**Lab ID: 221500122**

**Client ID: 3B-2**

Layer	Layer Description	Asbestos Type %	Other Fibrous Material %	Other Non Fibrous Material
1.	Black fibrous asphaltic material with granules	None Detected	Glass Fibers 10%	Asphalt/Binder, Mineral Grains
2.	Black asphaltic mastic	None Detected	None Detected	Asphalt/Binder

**Lab ID: 221500123**

**Client ID: 3B-3**

Layer	Layer Description	Asbestos Type %	Other Fibrous Material %	Other Non Fibrous Material
1.	Black fibrous asphaltic material with granules	None Detected	Glass Fibers 10%	Asphalt/Binder, Mineral Grains
2.	Black asphaltic mastic	None Detected	None Detected	Asphalt/Binder

**Lab ID: 221500124**

**Client ID: 4A-1**

Layer	Layer Description	Asbestos Type %	Other Fibrous Material %	Other Non Fibrous Material
1.	White compacted powdery material with paint	None Detected	None Detected	JC/Binder, Paint
2.	White chalky material with paper	None Detected	Cellulose 6%	Gypsum/Binder



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**Client Name:** Ardent Environmental Group, Inc  
**Project Manager:** Craig Metheny  
**Client Address:** 1827 Capital Street, Suite 103,  
Corona, CA 92880  
**Project Number:** 101278004  
**Project Location:** 15006 -15100 Nelson Ave, City of  
Industry

**Lab Batch Number:** 2215001  
**Samples Submitted:** 24  
**Samples Analyzed:** 24  
**Analysis Method:** EPA 600/R-93-116 &  
EPA 600/M4-82-020

**Analyzed by:** Hanaa  
Armanious

**Signature:** 

**Date:** 08-29-2022

**Reviewed by:** Zubair Ahmed

**Signature:** 

**Date:** 08-29-2022

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# 2215001

Project Name \_\_\_\_\_  
 Project No. \_\_\_\_\_  
 Sampler \_\_\_\_\_  
 Date \_\_\_\_\_

## Asbestos Bulk Sample Log

Sample #	HA	Description	Location	Condition/Notes
26	1J-2	Black Mastic	Roof Penetrations	
27	1J-3	↓	↓	
28	1K-1	Black Mastic	Parapet Cap Screws	
29	1K-2	↓	↓	
30	1K-3	↓	↓	
31	2A-1	Roof Core	Roof	
32	2A-2	↓	↓	
33	2A-3	↓	↓	
34	2B-1	Black Mastic w/ Silver Paint	Roof Vent	
35	2B-2	↓	↓	
36	2B-3	↓	↓	
37	2C-1	Tape w/ white Sealant	Parapet walls	
38	2C-2	↓	↓	
39	2C-3	↓	↓	
40	2D-1	white sealant w/ Silver Paint	Skylight	
41	2D-2	↓	↓	
42	2D-3	↓	↓	
43	3A-1	Roof Core	Roof	
44	3A-2	↓	↓	
45	3A-3	↓	↓	
46	3B-1	Black Sealant	Roof Seam	
47	3B-2	↓	↓	
48	3B-3	↓	↓	
49	4A-1	DW/JC	office	

Received By: Sarah Tran 8/26/22 2:37pm



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**Client Name:** Ardent Environmental Group, Inc  
**Project Manager:** Craig Metheny  
**Client Address:** 1827 Capital Street, Suite 103,  
Corona, CA 92880  
**Project Number:** 101278004  
**Project Location:** 15006 -15100 Nelson Ave, City of  
Industry

**Lab Batch Number:** 2215002  
**Samples Submitted:** 18  
**Samples Analyzed:** 18  
**Analysis Method:** EPA 600/R-93-116 &  
EPA 600/M4-82-020

**Lab ID:** 221500201

**Client ID:** 4A-2

Layer	Layer Description	Asbestos Type %	Other Fibrous Material %	Other Non Fibrous Material
1.	White compacted powdery material with paint	None Detected	None Detected	JC/Binder, Paint
2.	White chalky material with paper	None Detected	Cellulose 6%	Gypsum/Binder

**Lab ID:** 221500202

**Client ID:** 4A-3

Layer	Layer Description	Asbestos Type %	Other Fibrous Material %	Other Non Fibrous Material
1.	White compacted powdery material with paint	None Detected	None Detected	JC/Binder, Paint
2.	Yellow woven fibrous material	None Detected	Glass Fibers 85%	Binder/Filler
3.	White chalky material with paper	None Detected	Cellulose 6%	Gypsum/Binder

**Lab ID:** 221500203

**Client ID:** 4B-1

Layer	Layer Description	Asbestos Type %	Other Fibrous Material %	Other Non Fibrous Material
1.	White mastic	None Detected	Cellulose 2%	Mastic/Binder
2.	Brown fibrous material	None Detected	Cellulose 25%	Binder/Filler

**Lab ID:** 221500204

**Client ID:** 4B-2

Layer	Layer Description	Asbestos Type %	Other Fibrous Material %	Other Non Fibrous Material
1.	White mastic	None Detected	Cellulose 2%	Mastic/Binder
2.	Brown fibrous material	None Detected	Cellulose 25%	Binder/Filler
3.	Tan mastic	None Detected	Cellulose 2%	Mastic/Binder



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**Project Manager:** Craig Metheny  
**Client Address:** 1827 Capital Street, Suite 103,  
Corona, CA 92880  
**Project Number:** 101278004  
**Project Location:** 15006 -15100 Nelson Ave, City of  
Industry

**Lab Batch Number:** 2215002  
**Samples Submitted:** 18  
**Samples Analyzed:** 18  
**Analysis Method:** EPA 600/R-93-116 &  
EPA 600/M4-82-020

**Lab ID: 221500205**

**Client ID: 4B-3**

Layer	Layer Description	Asbestos Type %	Other Fibrous Material %	Other Non Fibrous Material
1.	White mastic	None Detected	Cellulose 2%	Mastic/Binder
2.	Brown fibrous material	None Detected	Cellulose 25%	Binder/Filler
3.	Tan mastic	None Detected	Cellulose 2%	Mastic/Binder

**Lab ID: 221500206**

**Client ID: 4C-1**

Layer	Layer Description	Asbestos Type %	Other Fibrous Material %	Other Non Fibrous Material
1.	Grey compressed fibrous material with paint	None Detected	Mineral Wool 80%, Cellulose 10%	Binder/Filler, Paint

**Lab ID: 221500207**

**Client ID: 4C-2**

Layer	Layer Description	Asbestos Type %	Other Fibrous Material %	Other Non Fibrous Material
1.	Grey compressed fibrous material with paint	None Detected	Mineral Wool 80%, Cellulose 10%	Binder/Filler, Paint

**Lab ID: 221500208**

**Client ID: 4C-3**

Layer	Layer Description	Asbestos Type %	Other Fibrous Material %	Other Non Fibrous Material
1.	Grey compressed fibrous material with paint	None Detected	Mineral Wool 80%, Cellulose 10%	Binder/Filler, Paint

**Lab ID: 221500209**

**Client ID: 4F-1**

Layer	Layer Description	Asbestos Type %	Other Fibrous Material %	Other Non Fibrous Material
1.	Black woven fibrous material	None Detected	Mineral Wool 85%	Binder/Filler

**Lab ID: 221500210**

**Client ID: 4G-1**

Layer	Layer Description	Asbestos Type %	Other Fibrous Material %	Other Non Fibrous Material
1.	Black asphaltic mastic	None Detected	None Detected	Asphalt/Binder, Mineral Grains



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**Project Manager:** Craig Metheny  
**Client Address:** 1827 Capital Street, Suite 103,  
Corona, CA 92880  
**Project Number:** 101278004  
**Project Location:** 15006 -15100 Nelson Ave, City of  
Industry

**Lab Batch Number:** 2215002  
**Samples Submitted:** 18  
**Samples Analyzed:** 18  
**Analysis Method:** EPA 600/R-93-116 &  
EPA 600/M4-82-020

**Lab ID: 221500211**

**Client ID: 4G-2**

Layer	Layer Description	Asbestos Type %	Other Fibrous Material %	Other Non Fibrous Material
1.	Black asphaltic mastic	None Detected	None Detected	Asphalt/Binder, Mineral Grains

**Lab ID: 221500212**

**Client ID: 4G-3**

Layer	Layer Description	Asbestos Type %	Other Fibrous Material %	Other Non Fibrous Material
1.	Black asphaltic mastic	None Detected	None Detected	Asphalt/Binder, Mineral Grains

**Lab ID: 221500213**

**Client ID: 3C-1**

Layer	Layer Description	Asbestos Type %	Other Fibrous Material %	Other Non Fibrous Material
1.	Brown flat rubbery material	None Detected	None Detected	Binder/Filler
2.	White mastic	None Detected	Cellulose 2%	Mastic/Binder

**Lab ID: 221500214**

**Client ID: 3C-2**

Layer	Layer Description	Asbestos Type %	Other Fibrous Material %	Other Non Fibrous Material
1.	Brown flat rubbery material	None Detected	None Detected	Binder/Filler
2.	White mastic	None Detected	Cellulose 2%	Mastic/Binder

**Lab ID: 221500215**

**Client ID: 3C-3**

Layer	Layer Description	Asbestos Type %	Other Fibrous Material %	Other Non Fibrous Material
1.	Brown flat rubbery material	None Detected	None Detected	Binder/Filler
2.	White mastic	None Detected	Cellulose 2%	Mastic/Binder



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**Project Manager:** Craig Metheny  
**Client Address:** 1827 Capital Street, Suite 103,  
Corona, CA 92880  
**Project Number:** 101278004  
**Project Location:** 15006 -15100 Nelson Ave, City of  
Industry

**Lab Batch Number:** 2215002  
**Samples Submitted:** 18  
**Samples Analyzed:** 18  
**Analysis Method:** EPA 600/R-93-116 &  
EPA 600/M4-82-020

**Lab ID:** 221500216

**Client ID:** 3D-1

Layer	Layer Description	Asbestos Type %	Other Fibrous Material %	Other Non Fibrous Material
1.	Beige vinyl material	None Detected	None Detected	Vinyl/Binder, Synthetic Foam
2.	Tan gummy mastic	None Detected	Cellulose 2%	Mastic/Binder

**Lab ID:** 221500217

**Client ID:** 3D-2

Layer	Layer Description	Asbestos Type %	Other Fibrous Material %	Other Non Fibrous Material
1.	Beige vinyl material	None Detected	None Detected	Vinyl/Binder, Synthetic Foam
2.	Tan gummy mastic	None Detected	Cellulose 2%	Mastic/Binder

**Lab ID:** 221500218

**Client ID:** 3D-3

Layer	Layer Description	Asbestos Type %	Other Fibrous Material %	Other Non Fibrous Material
1.	Beige vinyl material	None Detected	None Detected	Vinyl/Binder, Synthetic Foam
2.	Tan gummy mastic	None Detected	Cellulose 2%	Mastic/Binder





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# BULK ASBESTOS FIBER ANALYSIS

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**Project Manager:** Craig Metheny  
**Client Address:** 1827 Capital Street, Suite 103,  
Corona, CA 92880  
**Project Number:** 101278004  
**Project Location:** 15006 -15100 Nelson Ave, City of  
Industry

**Lab Batch Number:** 2215002  
**Samples Submitted:** 18  
**Samples Analyzed:** 18  
**Analysis Method:** EPA 600/R-93-116 &  
EPA 600/M4-82-020

**Analyzed by:** Hanaa  
Armanious

**Signature:**

**Date:** 08-29-2022

**Reviewed by:** Zubair Ahmed

**Signature:**

**Date:** 08-29-2022

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# 2215002

Project Name \_\_\_\_\_  
 Project No. \_\_\_\_\_  
 Sampler \_\_\_\_\_  
 Date \_\_\_\_\_

## Asbestos Bulk Sample Log

Sample #	HA	Description	Location	Condition/Notes
50	4A-2	4A	DW/SC	office
51	4A-3	↓	DW/SC	office
52	4B-1	4B	BB Mastic	office
53	<del>4B-2</del>	↓	↓	↓
54	<del>4B-3</del>	↓	↓	↓
55	4C-1	4C	Ceiling panel	one office
56	4C-2	↓	↓	↓
57	4C-3	↓	↓	↓
58	<del>4D-1</del>	<del>4D</del>	<del>↓</del>	<del>↓</del>
59	<del>4D-2</del>	<del>↓</del>	<del>↓</del>	<del>↓</del>
60	<del>4D-3</del>	<del>↓</del>	<del>↓</del>	<del>↓</del>
61	<del>4E-1</del>	4E	<del>↓</del>	<del>↓</del>
62	<del>4E-2</del>	↓	<del>↓</del>	<del>↓</del>
63	<del>4E-3</del>	↓	<del>↓</del>	<del>↓</del>
64	4F-1	4F	Cloth Insulation	SW corner
65	4G-1	4G	Black Mastic	Exterior
66	4G-2	↓	↓	↓
67	4G-3	↓	↓	↓
68	3C-1	3C	BB mastic (off-white)	throughout
69	3C-2	↓	↓	↓
70	3C-3	↓	↓	↓
71	3D-1	3D	Tan VSF w/ yellow mastic	throughout
72	3D-2	↓	↓	↓
73	3D-3	↓	↓	↓

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 8/26/24 2:37 PM



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**Client Name:** Ardent Environmental Group, Inc  
**Project Manager:** Craig Metheny  
**Client Address:** 1827 Capital Street, Suite 103,  
Corona, CA 92880  
**Project Number:** 101278004  
**Project Location:** 15006 -15100 Nelson Ave, City of  
Industry

**Lab Batch Number:** 2215003  
**Samples Submitted:** 12  
**Samples Analyzed:** 12  
**Analysis Method:** EPA 600/R-93-116 &  
EPA 600/M4-82-020

**Lab ID: 221500301**

**Client ID: 5A-1**

Layer	Layer Description	Asbestos Type %	Other Fibrous Material %	Other Non Fibrous Material
1.	White compacted powdery material	None Detected	Cellulose <1%	JC/Binder
2.	White chalky material with paper	None Detected	Cellulose 6%	Gypsum/Binder

**Lab ID: 221500302**

**Client ID: 5A-2**

Layer	Layer Description	Asbestos Type %	Other Fibrous Material %	Other Non Fibrous Material
1.	White compacted powdery material	None Detected	Cellulose <1%	JC/Binder
2.	White chalky material with paper	None Detected	Cellulose 6%	Gypsum/Binder

**Lab ID: 221500303**

**Client ID: 5A-3**

Layer	Layer Description	Asbestos Type %	Other Fibrous Material %	Other Non Fibrous Material
1.	White compacted powdery material	None Detected	Cellulose <1%	JC/Binder
2.	White chalky material with paper	None Detected	Cellulose 6%	Gypsum/Binder

**Lab ID: 221500304**

**Client ID: 5B-1**

Layer	Layer Description	Asbestos Type %	Other Fibrous Material %	Other Non Fibrous Material
1.	Blue/grey floor tile	None Detected	Cellulose	Binder/Filler
2.	Yellow adhesive with debris	None Detected	Cellulose 2%	Mastic/Binder
3.	Trace of black mastic	None Detected	Cellulose 2%	Mastic/Binder



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**Client Name:** Ardent Environmental Group, Inc  
**Project Manager:** Craig Metheny  
**Client Address:** 1827 Capital Street, Suite 103,  
Corona, CA 92880  
**Project Number:** 101278004  
**Project Location:** 15006 -15100 Nelson Ave, City of  
Industry

**Lab Batch Number:** 2215003  
**Samples Submitted:** 12  
**Samples Analyzed:** 12  
**Analysis Method:** EPA 600/R-93-116 &  
EPA 600/M4-82-020

**Lab ID: 221500305**

**Client ID: 5B-2**

Layer	Layer Description	Asbestos Type %	Other Fibrous Material %	Other Non Fibrous Material
1.	Blue/grey floor tile	None Detected	Cellulose	Binder/Filler
2.	Yellow adhesive with debris	None Detected	Cellulose 2%	Mastic/Binder
3.	Trace of black mastic	None Detected	Cellulose 2%	Mastic/Binder

**Lab ID: 221500306**

**Client ID: 5B-3**

Layer	Layer Description	Asbestos Type %	Other Fibrous Material %	Other Non Fibrous Material
1.	Blue/grey floor tile	None Detected	Cellulose	Binder/Filler
2.	Yellow adhesive with debris	None Detected	Cellulose 2%	Mastic/Binder
3.	Trace of black mastic	None Detected	Cellulose 2%	Mastic/Binder

**Lab ID: 221500310**

**Client ID: 5C-1**

Layer	Layer Description	Asbestos Type %	Other Fibrous Material %	Other Non Fibrous Material
1.	Black/grey asphaltic mastic	Chrysotile 2%	Cellulose 3%	Asphalt/Binder

**Lab ID: 221500311**

**Client ID: 5C-2**

Layer	Layer Description	Asbestos Type %	Other Fibrous Material %	Other Non Fibrous Material
1.	Black/grey asphaltic mastic	Chrysotile 2%	Cellulose 3%	Asphalt/Binder

**Lab ID: 221500312**

**Client ID: 5C-3**

Layer	Layer Description	Asbestos Type %	Other Fibrous Material %	Other Non Fibrous Material
1.	Black/grey asphaltic mastic	Chrysotile 2%	Cellulose 3%	Asphalt/Binder



2556 W Woodland Dr Anaheim, CA 92801

# BULK ASBESTOS FIBER ANALYSIS

BY POLARIZED LIGHT MICROSCOPY



**Client Name:** Ardent Environmental Group, Inc  
**Project Manager:** Craig Metheny  
**Client Address:** 1827 Capital Street, Suite 103,  
Corona, CA 92880  
**Project Number:** 101278004  
**Project Location:** 15006 -15100 Nelson Ave, City of  
Industry

**Lab Batch Number:** 2215003  
**Samples Submitted:** 12  
**Samples Analyzed:** 12  
**Analysis Method:** EPA 600/R-93-116 &  
EPA 600/M4-82-020

**Lab ID:** 221500313

**Client ID:** 4E-1

Layer	Layer Description	Asbestos Type %	Other Fibrous Material %	Other Non Fibrous Material
1.	Cream sandy material	None Detected	Cellulose 2%	Binder/Filler, Mineral Grains

**Lab ID:** 221500314

**Client ID:** 4E-2

Layer	Layer Description	Asbestos Type %	Other Fibrous Material %	Other Non Fibrous Material
1.	Cream sandy material	None Detected	Cellulose 2%	Binder/Filler, Mineral Grains

**Lab ID:** 221500315

**Client ID:** 4E-3

Layer	Layer Description	Asbestos Type %	Other Fibrous Material %	Other Non Fibrous Material
1.	Cream sandy material	None Detected	Cellulose 2%	Binder/Filler, Mineral Grains

**Analyzed by:** Cameron  
Zimmerman

**Signature:**

**Date:** 08-29-2022

**Reviewed by:** Zubair Ahmed

**Signature:**

**Date:** 08-29-2022

Reporting limit is 1%. If the sample was not collected by AIH Laboratory then the accuracy of the results is limited by the methodology and experience of the sample collector. Clients can verify specific reporting limit requirement from local regulatory agencies. Liability limited to cost of samples analysis. This report shall not be reproduced except in full, without written approval of AIH Laboratory. It shall not be used to claim product endorsement by NVLAP or any other agency of the government. Reported results relate only to the samples tested and may not be the representative of the sample area. AIH Laboratory shall dispose of the Customer's samples 14 days after receiving the samples unless instructed to store them for an alternate period of time in writing.

# 2215003

Project Name \_\_\_\_\_  
Project No. \_\_\_\_\_  
Sampler \_\_\_\_\_  
Date \_\_\_\_\_

## Asbestos Bulk Sample Log

Sample #	HA	Description	Location	Condition/Notes
74 SA-1	SA	DW/SC	office	
75 SA-2	↓	↓	↓	
76 SA-3	↓	↓	↓	
77 SB-1	SB	Gray VFT w/ yellow matrix	office	
78 SB-2	↓	↓	↓	
79 SB-3	↓	↓	↓	
80 ZD-1	ZD	white Sealant w/ Silver paint	Skylight	
81 ZD-2	↓	↓	↓	
82 ZD-3	↓	↓	↓	
83 SC-1	SC	Black Matrix w/ Silver paint	Roof	
84 SC-2	↓	↓	↓	
85 SC-3	↓	↓	↓	
86				
87				
88				
89				
90				
91				
92				
93				
94				
95				
96				
97				

Received by: Amy Nguyen →  
8/26/22 2:37 PM



**BULK ASBESTOS FIBER ANALYSIS**

Point Count Method (1000 Points)



2556 W Woodland Dr Anaheim, CA 92801

**Client Name:** Ardent Environmental Group, Inc  
**Project Manager:** Craig Metheny  
**Client Address:** 1827 Capital Street, Suite 103,  
Corona, CA 92880  
**Project Number:** 101278004  
**Project Location:** 15006 -15100 Nelson Ave, City of  
Industry

**Lab Batch Number:** 2215190  
**Samples Submitted:** 3  
**Samples Analyzed:** 3  
**Analysis Method:** EPA Method  
600/R-93/116

**Laboratory Sample ID:** 221519001 **Client Sample ID:** 1A-1-Layer 2

**Sample Description:** Layer 2 of 3: Cream compacted powdery material

Note: This sample was previously analyzed for asbestos content using Polarized Light Microscopy (PLM). The concentration of asbestos content was determined using visual estimation. The sample was reported to have <1% asbestos in Layer 2 and the corresponding Lab ID is 221500001.

Slide Prep Number	1	2	3	4	5	6	7	8	Total
<b>Asbestos Points</b>	0	0	0	0	0	0	0	0	0
Non-Asbestos Points	125	125	125	125	125	125	125	125	1000
Total Points Counted	125	125	125	125	125	125	125	125	1000

Asbestos Concentration: <0.1%

**Conclusion:**This sample contains <0.1% asbestos.

**Comment:** Asbestos fibers were observed in the field of view but not counted as points.

**Laboratory Sample ID:** 221519002 **Client Sample ID:** 1A-2-Layer 2

**Sample Description:** Layer 2 of 3: Cream compacted powdery material with paint

Note: This sample was previously analyzed for asbestos content using Polarized Light Microscopy (PLM). The concentration of asbestos content was determined using visual estimation. The sample was reported to have <1% asbestos in Layer 2 and the corresponding Lab ID is 221500002.

Slide Prep Number	1	2	3	4	5	6	7	8	Total
<b>Asbestos Points</b>	0	0	0	0	0	0	0	0	0
Non-Asbestos Points	125	125	125	125	125	125	125	125	1000
Total Points Counted	125	125	125	125	125	125	125	125	1000

Asbestos Concentration: <0.1%

**Conclusion:**This sample contains <0.1% asbestos.

**Comment:** Asbestos fibers were observed in the field of view but not counted as points.



**BULK ASBESTOS FIBER ANALYSIS**

Point Count Method (1000 Points)



2556 W Woodland Dr Anaheim, CA 92801

Phone:(562) 860-2201  
www.aihlab.com

**Client Name:** Ardent Environmental Group, Inc  
**Project Manager:** Craig Metheny  
**Client Address:** 1827 Capital Street, Suite 103,  
Corona, CA 92880  
**Project Number:** 101278004  
**Project Location:** 15006 -15100 Nelson Ave, City of  
Industry

**Lab Batch Number:** 2215190  
**Samples Submitted:** 3  
**Samples Analyzed:** 3  
**Analysis Method:** EPA Method  
600/R-93/116

**Laboratory Sample ID:** 221519003 **Client Sample ID:** 1A-3-Layer 2

**Sample Description:** Layer 2 of 3: Cream compacted powdery material with paint

Note: This sample was previously analyzed for asbestos content using Polarized Light Microscopy (PLM). The concentration of asbestos content was determined using visual estimation. The sample was reported to have <1% asbestos in Layer 2 and the corresponding Lab ID is 221500003.

Slide Prep Number	1	2	3	4	5	6	7	8	Total
<b>Asbestos Points</b>	0	0	0	0	0	0	0	0	0
Non-Asbestos Points	125	125	125	125	125	125	125	125	1000
Total Points Counted	125	125	125	125	125	125	125	125	1000

Asbestos Concentration: <0.1%

**Conclusion:** This sample contains <0.1% asbestos.

**Comment:** Asbestos fibers were observed in the field of view but not counted as points.

**Analyzed by:** Cameron Zimmerman

**Signature:** **Date:** 08-30-2022

**Reviewed by:** Zubair Ahmed

**Signature:** **Date:** 08-30-2022

Reporting limit is 0.1%. "<" denotes presence of asbestos below reporting limit. ND=None Detected. If the sample was not collected by AIH Laboratory then the accuracy of the results is limited by the methodology and experience of the sample collector. Clients can verify specific reporting limit requirement from local regulatory agencies. Liability limited to cost of samples analysis. This report shall not be reproduced except in full, without written approval of AIH Laboratory. It shall not be used to claim product endorsement by NVLAP or any other agency of the government. Reported results relate only to the samples tested and may not be the representative of the sample area. AIH Laboratory shall dispose of the Customer's samples 30 days after receiving the samples unless instructed to store them for an alternate period of time in writing.

2215190

**AIH Lab Customer Service**

---

**From:** Craig Metheny <cmetheny@enercon.com>  
**Sent:** Tuesday, August 30, 2022 3:53 PM  
**To:** AIH Lab Customer Service  
**Subject:** RE: 101278004 | 15006 -15100 Nelson Ave, City of Industry | Lab ID: 2215000, 2215001, 2215002, 2215003

**Categories:** Point Count

Thank you.

Please analyze the following samples by the Point Count 1000 method on a 2-day turn around.

- 1A-1, Layer 2
- 1A-2, Layer 2
- 1A-3, Layer 2

Received by: Amy Nguyen ←

8/30/22 3:53 pm

**Craig Metheny, C.A.C.**  
Principal Geologist  
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---

**From:** AIH Lab Customer Service <frontdesk@aihlab.com>  
**Sent:** Tuesday, August 30, 2022 2:16 PM  
**To:** Craig Metheny <cmetheny@ardentenv.com>; Craig Metheny <cmetheny@enercon.com>  
**Subject:** 101278004 | 15006 -15100 Nelson Ave, City of Industry | Lab ID: 2215000, 2215001, 2215002, 2215003



15006, 15010 and 15100 Nelson Avenue  
City of Industry, California

September 26, 2022  
Revised: April 20, 2023  
Project No. 101278004

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**ATTACHMENT B**  
**LEAD SURVEY REPORT**



**LEAD TESTING SERVICES REPORT  
15006-15100 EAST NELSON AVENUE  
CITY OF INDUSTRY, CALIFORNIA 91744**

**PREPARED FOR:**

MR. CRAIG METHENY, PRINCIPAL GEOLOGIST  
ENERCON SERVICES, INC.  
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CORONA, CALIFORNIA 92878  
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**PREPARED BY:**

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SEPTEMBER 22, 2022

VISTA PROJECT No. 220500007

ENERCON PROJECT No. 101278004



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## 1.0 INTRODUCTION

Per your request, Vista Environmental Consulting, Inc. (VISTA) performed Lead Testing Services at the buildings and structures located at 15006 through 15100 East Nelson Avenue in the City of Industry, Los Angeles County, California (the Project Site).

There are four buildings and one mobile office. They are the following:

1. 15006 E. Nelson Ave. – 1,405 square foot (SF) 1-Story Stucco – Office
2. 15006 E. Nelson Ave. – 3,500 SF 1-Story – Garage/Storage Warehouse
3. 15010 E. Nelson Ave. – Mobile Office
4. 15100 E. Nelson Ave. – 2,406 SF 1-Story Metal – Storage
5. 15100 E. Nelson Ave. – 14,740 SF Metal – Warehouse

The lead testing services were performed to identify and sample accessible representative building components for the presence of lead-based paints and lead-bearing substances (LBPs and LBSs) that may be present at the Project Site in preparation for renovation or demolition activities.

The purpose of this testing was to identify hazardous building materials (limited to lead content). Identified hazardous materials should be properly removed, waste characterized, and disposed prior to being impacted by any activities that may disturb the identified hazardous materials. The data provided in this report can assist all parties involved in this project make informed decisions with regards to regulatory compliance and the health and safety of their employees. This testing included the following:

- Representative painted and coated building components were assessed and sampled to determine the lead concentrations.

### 1.1 *Building Description*

The project site consisted of wood-frame and metal-frame structures comprised of offices, garages and storage Buildings.

## 2.0 METHODOLOGY

VISTA performed the lead testing services on August 25, 2022. The testing was performed by VISTA personnel Mr. Peter Kolesar, Jr. The report preparation and VISTA project management was performed by Mr. Stephen Reese. Mr. Kolesar and Mr. Reese are Lead-Related Construction Inspector-Assessors and Project Monitors as issued by the State of California Department of Public Health (CDPH).

Testing activities were performed by the following VISTA personnel:

- Mr. Peter Kolesar, Jr. (CDPH LRC #00007819/20)

Report preparation activities were performed by the following VISTA personnel:

- Mr. Stephen Reese (CDPH LRC #00006758/59)

Quantities and locations are based upon areas that were accessed. Materials similar to those in this report may be present in areas which were not accessed. VISTA made every reasonable effort to access these areas. Subsurface investigations were not proposed nor performed as part of this testing.

### 2.1 *Lead*

Suspect lead-based paints (LBPs) and lead-bearing substances (LBS) were identified via visual inspection. Representative surface coatings and materials were tested utilizing an X-Ray Fluorescence (XRF) direct read spectrum analyzer device in accordance with the requirements of the manufacturer's performance characteristics sheet (PCS) to evaluate lead levels. The following two instruments were used. NITON Corporation XRF Spectrum Analyzer, Model XLp- 300 and Viken Corporation XRF Spectrum Analyzer, Model Pb200i. NITON Corporation XRF Spectrum Analyzer, Model XLp- 300 is a solid-state detector optimized for lead L-shell and K-shell X-ray detection and uses a 40 mCi 109Cd (1,480 Mbq) isotope for an excitation source. Viken Corporation XRF Spectrum Analyzer, Model Pb200i is a solid-state detector optimized for lead K-shell X-ray detection and uses a 5 mCi 57 Co isotope for an excitation source.

This testing was a screening of paint for the purpose of characterizing the lead content in paint and coatings likely to be disturbed during work activities. For this purpose, XRF analysis was

used to screen for lead levels and provides results that are generally representative of painted/coated surfaces present at the Project Site. This survey was ***not*** a surface by surface inspection as outlined in the U.S. Department of Housing and Urban Development (HUD) *Guidelines for the Evaluation and Control of Lead-Based Paint Hazards in Housing* pursuant to Title X of the Housing and Community Development Act of 1992. This analytical data can be helpful in evaluation of lead-related environmental risks in general, but cannot be used to calculate worker exposures and is not a substitute for employee exposure monitoring or waste stream sampling. 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<sup>2</sup>) or greater.
2. Non lead-based paint were determined when XRF results revealed a lead concentration of <0.7 mg/cm<sup>2</sup>. Due to the limitations of the XRF, materials with results 0.1 mg/cm<sup>2</sup> or greater must be treated as lead-containing. **Please review the information in the “Recommendations/Conclusions” section prior to any disturbance of materials noted as being negative or LCSC.**

### 3.0 RESULTS

#### 3.1 Lead

VISTA collected 259 XRF readings (including calibration) of paint and coatings located at the Project Site. The results for this testing indicate that the following building components and respective surface coatings ***did have*** lead concentrations defining them as Lead-Based Paints (LBP) or Lead-Bearing Substances (LBSs).

**Table 1 of 5** **15006 E. Nelson Ave. (Office)**

MATERIAL	DESCRIPTION (COLOR/SUBSTRATE)	LOCATION	CONTAMINANT	ESTIMATED QUANTITY <sup>1</sup>
Parking Stripe	Yellow/Concrete	Exterior (Note: Yellow paint under blue and white parking stripes)	Lead-Based Paint (LBP)	300 LF
Lead-Containing Surface Coatings (LCSCs) Detected (See XRF Lead Data Table)				

**Table 2 of 5** **15006 E. Nelson Ave. (Warehouse)**

MATERIAL	DESCRIPTION (COLOR/SUBSTRATE)	LOCATION	CONTAMINANT	ESTIMATED QUANTITY <sup>1</sup>
Pipe	Yellow/Metal	Interior	Lead-Based Paint (LBP)	200 LF
Gutter	Tan/Metal	Exterior	Lead-Based Paint (LBP)	380 LF
Lead-Containing Surface Coatings (LCSCs) Detected (See XRF Lead Data Table)				

**Table 3 of 5** **15010 E. Nelson Ave. (Mobile Office)**

MATERIAL	DESCRIPTION (COLOR/SUBSTRATE)	LOCATION	CONTAMINANT	ESTIMATED QUANTITY <sup>1</sup>
No Lead-Based Paints/Lead-Bearing Substances Detected				
Lead-Containing Surface Coatings (LCSCs) Detected (See XRF Lead Data Table)				

**Table 4 of 5** **15100 E. Nelson Ave. (Storage)**

MATERIAL	DESCRIPTION (COLOR/SUBSTRATE)	LOCATION	CONTAMINANT	ESTIMATED QUANTITY <sup>1</sup>
No Lead-Based Paints/Lead-Bearing Substances/LCSCs Detected				

**Table 5 of 5** **15100 E. Nelson Ave. (Warehouse)**

MATERIAL	DESCRIPTION (COLOR/ SUBSTRATE)	LOCATION	CONTAMINANT	ESTIMATED QUANTITY <sup>1</sup>
Pipe	Yellow/Metal	Interior	Lead-Based Paint (LBP)	200 LF
Gutter	Tan/Metal	Exterior	Lead-Based Paint (LBP)	380 LF
Lead-Containing Surface Coatings (LCSCs) Detected (See XRF Lead Data Table)				

Notes:  
 SF = square feet  
 LF = linear feet  
 EA = each  
Lead-Based Paint = 1.0 milligrams per square centimeter (mg/cm<sup>2</sup>) of lead or greater is present, as defined by 17 California Code of Regulations (CCR) 35001-36100. **Los Angeles County Health and Safety Code** 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.”  
Lead-Bearing Substances = 1.0 mg/cm<sup>2</sup> of lead or greater is present  
Lead-Containing Surface Coatings = Greater than limit of detection (0.1) and less than 1.0 mg/cm<sup>2</sup> of lead present (8 California Code of Regulations [CCR] 1532.1). Refer to the XRF Lead Data Table (Appendix A) for building components and surface coatings considered LCSCs at the Project Site. Contractor is responsible for employee exposure monitoring during disturbance/demolition of LCSCs.  
 1 Order of Magnitude ESTIMATED Quantities and Locations ARE NOT to be used solely for bidding purposes. It is the sole responsibility of the contractor to verify quantities and locations of hazardous materials in the path of construction through site visits and contractual bid set documents, including, but not limited to all specifications, drawings, and addenda. Any discrepancies between the contractual bid set documents and site visits must be submitted in writing to the Owner or the Owner’s representative, PRIOR to bidding.

**Refer to Recommendations Section below for clarification regarding lead related construction.** The XRF data is included in Appendix A and the positive XRF location maps (field drawings) are included in Appendix B.

#### 4.0 RECOMMENDATIONS

##### 4.1 Lead

The results of the lead testing indicate that **Lead-Based Paints** and **Lead-Containing Surface Coatings are** present at the project site.

Written notification to Cal/OSHA must be accomplished should LBP activities involve equal to or more than 100 square feet or 100 linear feet of removal in accordance with the requirements of 8 CCR 1532.1. Written notification to CDPH may be required.



At present there is no state or federal regulation requiring mandatory lead removal or abatement prior to disturbance of building materials with identified lead paint or coatings. However, there are applicable Cal/OSHA worker protection and training requirements, Cal/EPA waste disposal requirements, CDPH requirements for public and residential buildings, Federal EPA requirements for residential buildings and child occupied facilities, and 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 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.

*“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 May 8, 2000.*

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) or 0.06% weight of lead, the variation of lead content due to aging and weathering, and the variation of detection limits associated with analysis of bulk materials, such as paint chips and surface content analysis via XRF, it is recommended that all painted or coated surfaces be treated as potentially containing lead. 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 from analysis of bulk materials or surface content 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.

◆ **Federal EPA Renovation, Repair and Painting Rule 40 CFR 745:** Effective April 22, 2010 this rule covers all non-abatement renovation, repair or painting work in pre-1978 child occupied facilities and housing. Work which disturbs more than 6 square feet per room, or 20 square feet per exterior, of paint or other surface coatings that contain lead in concentrations equal to or in excess of 1.0 mg/cm<sup>2</sup> or 0.5% by weight are covered by this rule. Paint or surface coatings, in pre-1978 child occupied facilities and housing, that have not been tested, or were tested using non-approved methods are also covered under this rule. Renovation, remodeling, painting, window replacement, plumbing, electrical work, heating & air-conditioning, demolition, plus work performed by trades like carpenters, electricians and handymen are all covered under this rule. The rule applies to persons working for rental property owners, schools, day care providers, non-profits and governmental agencies. These regulations require notifications to owners &

tenants, special training, certifications (for both companies & individuals), work practices, and clearance verification for such activities.

◆ **Cal/EPA** through the Division of Toxic Substance Control (DTSC) regulates disposal of lead hazardous waste (22 CCR Division 4.5, Minimum Standards for Management of Hazardous and Extremely Hazardous Wastes). 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 lead painted or coated 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 Department of Public Health (CDPH) has specific requirements (Title 17 Sections 35001 thru 36100 et. al.) for hazard assessment and work in public or residential structures in regards to lead-based paint. 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. A “lead hazard” means deteriorated lead-based paint, lead contaminated dust, lead contaminated soil, disturbing lead-based paint or presumed lead-based paint without containment, or any other nuisance which may result in persistent and quantifiable lead exposure. VISTA recommends that all parties who come into contact with paint or soil that have detectable lead concentrations follow all applicable federal, state and local regulations relating to employee health and safety and proper disposal of generated wastes.

## 5.0 LIMITATIONS & EXCLUSIONS

VISTA's scope of work was to perform lead testing services prior to the planned renovation or demolition of the project site buildings. Subsurface investigations were not accomplished as part of this scope of work. Quantities and locations are based upon areas that were accessed. Materials similar to those in this report may be present in areas which were not accessed. Because of this VISTA recommends including line item pricing, allowances, and/or additive/deductive wording to bid sheets for unforeseen conditions.

All material quantities reported herein are rough order of magnitude estimates and should not be used for bidding purposes. All contractors are responsible for accurately determining quantities and locations of materials identified in this report. Findings, conclusions, recommendations and analytical data offered in this report have been derived from reviewing existing information provided by the client, visual survey of the building materials and systems, and the outcome of sampling and analysis of suspected hazardous materials.

Should materials similar to those identified in this report, or if other forms of suspect hazardous materials are discovered during work activities, maintenance personnel and/or contractors should be instructed to immediately cease work activities which may initiate an exposure episode, and notify the appropriate management personnel. All such materials should be assumed to be hazardous and handled accordingly until properly tested and assessed.

Respectfully Submitted,

**Vista Environmental Consulting, Inc.**



Stephen S. Reese

Senior Project Manager

CDPH Lead Inspector-Assessor/Project Monitor LRC#00006758/59 (expires 11/25/2023)

**APPENDIX A**  
**XRF LEAD DATA TABLE**

CITY OF INDUSTRY

READING NO.	TESTING DATE	COMPONENT	SUBSTRATE	COLOR	CONDITION	SIDE	BUILDING	ROOM	FLOOR	MISC.	RESULTS	LEAD (mg/cm <sup>2</sup> )
1	8/25/2022					SHUTTER CALIBRATION					QA	1.99
2	8/25/2022					CALIBRATE					QA	1.1
3	8/25/2022					CALIBRATE					QA	1
4	8/25/2022					CALIBRATE					QA	1
5	8/25/2022	WALL	DRYWALL	WHITE	INTACT	B	15006, E NELSON AVE OFFICE	8	1	INTERIOR	Negative	0
6	8/25/2022	DOOR JAMB	WOOD	BLACK	INTACT	B	15006, E NELSON AVE OFFICE	8	1	INTERIOR	Negative	0
7	8/25/2022	CEILING	SAAC	WHITE	INTACT	B	15006, E NELSON AVE OFFICE	8	1	INTERIOR	LCS	0.5
8	8/25/2022	DOOR JAMB	WOOD	BLACK	INTACT	B	15006, E NELSON AVE OFFICE	8	1	INTERIOR	Negative	0
9	8/25/2022	WALL	DRYWALL	WHITE	INTACT	C	15006, E NELSON AVE OFFICE	5	1	INTERIOR	Negative	0
10	8/25/2022	DOOR	WOOD	BLACK	INTACT	C	15006, E NELSON AVE OFFICE	5	1	INTERIOR	Negative	0
11	8/25/2022	WINDOW FRAME	WOOD	BLACK	INTACT	B	15006, E NELSON AVE OFFICE	5	1	INTERIOR	LCS	0.15
12	8/25/2022	WINDOW SILL	WOOD	BLACK	INTACT	B	15006, E NELSON AVE OFFICE	5	1	INTERIOR	LCS	0.1
13	8/25/2022	CEILING	SAAC	WHITE	INTACT	D	15006, E NELSON AVE OFFICE	5	1	INTERIOR	Negative	0
14	8/25/2022	CEILING	SAAC	WHITE	INTACT	D	15006, E NELSON AVE OFFICE	7	1	INTERIOR	Negative	0
15	8/25/2022	WALL	DRYWALL	WHITE	INTACT	A	15006, E NELSON AVE OFFICE	7	1	INTERIOR	Negative	0
16	8/25/2022	DOOR	WOOD	BLACK	INTACT	C	15006, E NELSON AVE OFFICE	6	1	INTERIOR	Negative	0
17	8/25/2022	DOOR JAMB	WOOD	BLACK	INTACT	C	15006, E NELSON AVE OFFICE	6	1	INTERIOR	Negative	0
18	8/25/2022	WINDOW FRAME	WOOD	BLACK	INTACT	A	15006, E NELSON AVE OFFICE	6	1	INTERIOR	Negative	0.05
19	8/25/2022	WINDOW SILL	WOOD	BLACK	INTACT	A	15006, E NELSON AVE OFFICE	4	1	INTERIOR	Negative	0.01
20	8/25/2022	WALL	DRYWALL	WHITE	INTACT	D	15006, E NELSON AVE OFFICE	4	1	INTERIOR	Negative	0
21	8/25/2022	DOOR	METAL	GRAY	INTACT	A	15006, E NELSON AVE OFFICE	2	1	INTERIOR	Negative	0
22	8/25/2022	DOOR JAMB	WOOD	WHITE	INTACT	A	15006, E NELSON AVE OFFICE	2	1	INTERIOR	Negative	0
23	8/25/2022	WALL	DRYWALL	WHITE	INTACT	C	15006, E NELSON AVE OFFICE	2	1	INTERIOR	Negative	0
24	8/25/2022	WINDOW FRAME	WOOD	BLACK	INTACT	C	15006, E NELSON AVE OFFICE	2	1	INTERIOR	Negative	0
25	8/25/2022	WALL	DRYWALL	WHITE	INTACT	A	15006, E NELSON AVE OFFICE	1	1	INTERIOR	Negative	0
26	8/25/2022	CEILING	SAAC	WHITE	INTACT	A	15006, E NELSON AVE OFFICE	1	1	INTERIOR	LCS	0.5
27	8/25/2022	SHLF	WOOD	WHITE	INTACT	D	15006, E NELSON AVE OFFICE	1	1	INTERIOR	Negative	0
28	8/25/2022	WALL PANEL	WOOD	WHITE	INTACT	B	15006, E NELSON AVE OFFICE	1	1	INTERIOR	Negative	0
29	8/25/2022	WINDOW FRAME	WOOD	BLACK	INTACT	C	15006, E NELSON AVE OFFICE	3	1	INTERIOR	Negative	0.06
30	8/25/2022	DOOR JAMB	WOOD	BLACK	INTACT	A	15006, E NELSON AVE OFFICE	3	1	INTERIOR	Negative	0
31	8/25/2022	WALL	DRYWALL	WHITE	INTACT	A	15006, E NELSON AVE OFFICE	3	1	INTERIOR	Negative	0
32	8/25/2022	WALL	DRYWALL	WHITE	INTACT	B	15006, E NELSON AVE OFFICE	9 RR	1	INTERIOR	Negative	<LOD
33	8/25/2022	CEILING	DRYWALL	WHITE	INTACT	B	15006, E NELSON AVE OFFICE	9 RR	1	INTERIOR	Negative	0.01
34	8/25/2022	DOOR JAMB	WOOD	BLACK	INTACT	A	15006, E NELSON AVE OFFICE	9 RR	1	INTERIOR	Negative	0
35	8/25/2022	TOILET	PORCELAIN	WHITE	INTACT	D	15006, E NELSON AVE OFFICE	9 RR	1	INTERIOR	Negative	0.01
36	8/25/2022	SINK	PORCELAIN	WHITE	INTACT	B	15006, E NELSON AVE OFFICE	9 RR	1	INTERIOR	Negative	0
37	8/25/2022	SHLF	WOOD	WHITE	INTACT	B	15006, E NELSON AVE OFFICE	9 RR	1	INTERIOR	Negative	0
38	8/25/2022	WALL	DRYWALL	WHITE	INTACT	A	15006, E NELSON AVE OFFICE	HALLWAY	1	INTERIOR	Negative	0
39	8/25/2022	CEILING	DRYWALL	WHITE	INTACT	A	15006, E NELSON AVE OFFICE	HALLWAY	1	INTERIOR	Negative	0
40	8/25/2022	DOOR	METAL	WHITE	INTACT	C	15006, E NELSON AVE OFFICE	10 RR	1	INTERIOR	Negative	0
41	8/25/2022	DOOR JAMB	METAL	WHITE	INTACT	C	15006, E NELSON AVE OFFICE	10 RR	1	INTERIOR	Negative	0
42	8/25/2022	WALL	DRYWALL	WHITE	INTACT	C	15006, E NELSON AVE OFFICE	10 RR	1	INTERIOR	Null	0
43	8/25/2022	WALL	DRYWALL	WHITE	INTACT	C	15006, E NELSON AVE OFFICE	10 RR	1	INTERIOR	Negative	0
44	8/25/2022	CEILING	DRYWALL	WHITE	INTACT	C	15006, E NELSON AVE OFFICE	10 RR	1	INTERIOR	Negative	<LOD
45	8/25/2022	SINK	PORCELAIN	WHITE	INTACT	B	15006, E NELSON AVE OFFICE	10 RR	1	INTERIOR	Negative	0
46	8/25/2022	TOILET	PORCELAIN	WHITE	INTACT	C	15006, E NELSON AVE OFFICE	10 RR	1	INTERIOR	Negative	0.01
47	8/25/2022	WALL	STUCCO	BEIGE	INTACT	C	15006, E NELSON AVE OFFICE	10 RR	1	EXTERIOR	Negative	0
48	8/25/2022	OVERHANG	STUCCO	BEIGE	INTACT	C	15006, E NELSON AVE OFFICE	10 RR	1	EXTERIOR	Negative	0
49	8/25/2022	DOWN SPOUT	METAL	TAN	INTACT	C	15006, E NELSON AVE OFFICE	10 RR	1	EXTERIOR	Negative	0
50	8/25/2022	DOOR	METAL	BROWN	INTACT	C	15006, E NELSON AVE OFFICE	10 RR	1	EXTERIOR	Negative	0
51	8/25/2022	DOOR JAMB	METAL	BROWN	INTACT	C	15006, E NELSON AVE OFFICE	10 RR	1	EXTERIOR	Negative	0
52	8/25/2022	GUTTER	METAL	BROWN	INTACT	C	15006, E NELSON AVE OFFICE	10 RR	1	EXTERIOR	Negative	0
53	8/25/2022	FLASHING	METAL	BROWN	INTACT	C	15006, E NELSON AVE OFFICE	10 RR	1	EXTERIOR	Negative	0
54	8/25/2022	WALL	WOOD	BLUE	INTACT	C	15006, E NELSON AVE OFFICE	10 RR	1	EXTERIOR	Negative	0
55	8/25/2022	FASCIA	WOOD	BROWN	DETERIORATED	C	15006, E NELSON AVE OFFICE	10 RR	1	EXTERIOR	Negative	0
56	8/25/2022	CANOPY CEILING	WOOD	WHITE	INTACT	B	15006, E NELSON AVE OFFICE	10 RR	1	EXTERIOR	Negative	0
57	8/25/2022	CANOPY BEAM	WOOD	TAN	INTACT	B	15006, E NELSON AVE OFFICE	10 RR	1	EXTERIOR	Negative	0
58	8/25/2022	CANOPY POST	WOOD	TAN	INTACT	B	15006, E NELSON AVE OFFICE	10 RR	1	EXTERIOR	Negative	0
59	8/25/2022	DOWN SPOUT	METAL	BROWN	INTACT	B	15006, E NELSON AVE OFFICE	10 RR	1	EXTERIOR	Negative	0
60	8/25/2022	GUTTER	METAL	BROWN	INTACT	B	15006, E NELSON AVE OFFICE	10 RR	1	EXTERIOR	Negative	0.01
61	8/25/2022	WINDOW FRAME	WOOD	BROWN	INTACT	B	15006, E NELSON AVE OFFICE	10 RR	1	EXTERIOR	Negative	0
62	8/25/2022	WALL	STUCCO	BEIGE	INTACT	B	15006, E NELSON AVE OFFICE	10 RR	1	EXTERIOR	Negative	0
63	8/25/2022	DOOR	METAL	BLACK	INTACT	B	15006, E NELSON AVE OFFICE	10 RR	1	EXTERIOR	Negative	0
64	8/25/2022	BOLLARD	METAL	RED	INTACT	B	15006, E NELSON AVE OFFICE	10 RR	1	EXTERIOR	Negative	0
65	8/25/2022	CABINET	WOOD	WHITE	INTACT	B	15006, E NELSON AVE OFFICE	10 RR	1	EXTERIOR	Negative	0.02

CITY OF INDUSTRY

READING NO.	TESTING DATE	COMPONENT	SUBSTRATE	COLOR	CONDITION	SIDE	BUILDING	ROOM	FLOOR	MISC.	RESULTS	LEAD (mg/cm <sup>2</sup> )
66	8/25/2022	COUNTER	WOOD	BLACK	INTACT	B	15006, E NELSON AVE OFFICE		1	EXTERIOR	Negative	0
67	8/25/2022	PARKING STRIPE	CONCRETE	BLUE	INTACT	B	15006, E NELSON AVE OFFICE		1	EXTERIOR	Negative	0.08
68	8/25/2022	PARKING STRIPE	CONCRETE	WHITE	INTACT	B	15006, E NELSON AVE OFFICE		1	EXTERIOR	LCSC	0.4
69	8/25/2022	PARKING STRIPE	CONCRETE	YELLOW	INTACT	B	15006, E NELSON AVE OFFICE		1	EXTERIOR	LBP	1.3
70	8/25/2022	WALL CABINET	WOOD	WHITE	INTACT	B	15006, E NELSON AVE OFFICE		1	EXTERIOR	Negative	0
71	8/25/2022	WALL	BRICK	WHITE	INTACT	B	15006, E NELSON AVE OFFICE		1	EXTERIOR	Negative	0
72	8/25/2022	WALL POST	METAL	BROWN	INTACT	B	15006, E NELSON AVE OFFICE		1	EXTERIOR	Negative	0.09
73	8/25/2022	WALL	STUCCO	WHITE	INTACT	A	15006, E NELSON AVE OFFICE		1	EXTERIOR	Negative	0
74	8/25/2022	DOOR	METAL	GRAY	INTACT	A	15006, E NELSON AVE OFFICE		1	EXTERIOR	Negative	0
75	8/25/2022	DOOR JAMB	WOOD	WHITE	INTACT	A	15006, E NELSON AVE OFFICE		1	EXTERIOR	Negative	0
76	8/25/2022	OVERHANG CEILING	WOOD	WHITE	INTACT	A	15006, E NELSON AVE OFFICE		1	EXTERIOR	Negative	0.03
77	8/25/2022	OVERHANG CEILING	WOOD	WHITE	INTACT	A	15006, E NELSON AVE OFFICE		1	EXTERIOR	Negative	0
78	8/25/2022	OVERHANG FASCIA	WOOD	BROWN	INTACT	A	15006, E NELSON AVE OFFICE		1	EXTERIOR	Negative	0
79	8/25/2022	OVERHANG FLASHING	METAL	BROWN	INTACT	A	15006, E NELSON AVE OFFICE		1	EXTERIOR	Null	0
80	8/25/2022	WALL	BRICK	WHITE	INTACT	D	15006 E NELSON AVE WAREHOUSE		1	EXTERIOR	Negative	0
81	8/25/2022	WALL	BRICK	BLUE	INTACT	D	15006 E NELSON AVE WAREHOUSE		1	EXTERIOR	Negative	0
82	8/25/2022	WINDOW FRAME	BRICK	BROWN	INTACT	D	15006 E NELSON AVE WAREHOUSE		1	EXTERIOR	Negative	0
83	8/25/2022	DOOR	METAL	BROWN	INTACT	D	15006 E NELSON AVE WAREHOUSE		1	EXTERIOR	Negative	0
84	8/25/2022	DOOR JAMB	METAL	BROWN	INTACT	D	15006 E NELSON AVE WAREHOUSE		1	EXTERIOR	Negative	0
85	8/25/2022	CONDUIT	METAL	WHITE	INTACT	D	15006 E NELSON AVE WAREHOUSE		1	EXTERIOR	Negative	0
86	8/25/2022	DOWN SPOUT	METAL	BROWN	INTACT	A	15006 E NELSON AVE WAREHOUSE		1	EXTERIOR	Negative	0.01
87	8/25/2022	BOLLARD	METAL	RED	INTACT	A	15006 E NELSON AVE WAREHOUSE		1	EXTERIOR	Negative	0
88	8/25/2022	TRANSFORMER	METAL	GREEN	INTACT	A	15006 E NELSON AVE WAREHOUSE		1	EXTERIOR	LCSC	0.23
89	8/25/2022	COVER PLATE	METAL	GREEN	INTACT	A	15006 E NELSON AVE WAREHOUSE		1	EXTERIOR	LCSC	0.11
90	8/25/2022	PARKING STRIPE	CONCRETE	WHITE	INTACT	A	15006 E NELSON AVE WAREHOUSE		1	EXTERIOR	LCSC	0.5
91	8/25/2022	WALL	BRICK	WHITE	INTACT	B	15006 E NELSON AVE WAREHOUSE		1	EXTERIOR	Negative	0
92	8/25/2022	DOOR	METAL	BROWN	INTACT	B	15006 E NELSON AVE WAREHOUSE		1	EXTERIOR	Negative	0
93	8/25/2022	DOOR JAMB	METAL	BROWN	INTACT	B	15006 E NELSON AVE WAREHOUSE		1	EXTERIOR	Negative	0.03
94	8/25/2022	PARKING STRIPE	CONCRETE	YELLOW	INTACT	A	15006 E NELSON AVE WAREHOUSE		1	EXTERIOR	LCSC	0.26
95	8/25/2022	WALL	BRICK	WHITE	INTACT	A	15006 E NELSON AVE WAREHOUSE		1	EXTERIOR	Negative	0
96	8/25/2022	WALL	BRICK	BLUE	INTACT	A	15006 E NELSON AVE WAREHOUSE		1	EXTERIOR	Negative	0
97	8/25/2022	PIPE	METAL	BLUE	INTACT	A	15006 E NELSON AVE WAREHOUSE		1	EXTERIOR	LCSC	0.3
98	8/25/2022	CONDUIT	METAL	WHITE	INTACT	A	15006 E NELSON AVE WAREHOUSE		1	EXTERIOR	Negative	0
99	8/25/2022	DOWN SPOUT	METAL	BROWN	INTACT	A	15006 E NELSON AVE WAREHOUSE		1	EXTERIOR	Negative	0.03
100	8/25/2022	WALL SHED	WOOD	BROWN	INTACT	C	15006 E NELSON AVE WAREHOUSE		1	EXTERIOR	Negative	0
101	8/25/2022	WALL SHED	WOOD	BROWN	INTACT	C	15006 E NELSON AVE WAREHOUSE		1	EXTERIOR	Negative	0
102	8/25/2022	ROLL UP DOOR	METAL	BROWN	INTACT	C	15006 E NELSON AVE WAREHOUSE		1	EXTERIOR	Negative	0
103	8/25/2022	CANOPY CAGE	METAL	BLACK	INTACT	C	15006 E NELSON AVE WAREHOUSE		1	EXTERIOR	Negative	0
104	8/25/2022	CANOPY CAGE	METAL	BLACK	INTACT	C	15006 E NELSON AVE WAREHOUSE		1	EXTERIOR	Negative	0
105	8/25/2022	CANOPY CAGE FOOTING	CONCRETE	RED-YELLOW	DIETERORATED	C	15006 E NELSON AVE WAREHOUSE		1	EXTERIOR	Negative	0
106	8/25/2022	CANOPY CAGE FOOTING	CONCRETE	RED-YELLOW	DIETERORATED	C	15006 E NELSON AVE WAREHOUSE		1	EXTERIOR	Negative	0
107	8/25/2022	LADDER	METAL	BROWN	DIETERORATED	C	15006 E NELSON AVE WAREHOUSE		1	EXTERIOR	Negative	0
108	8/25/2022	FLASHING	METAL	BROWN	INTACT	C	15006 E NELSON AVE WAREHOUSE		ROOF	EXTERIOR	Negative	0.01
109	8/25/2022	DOOR	METAL	BLACK	INTACT	D	15006 E NELSON AVE WAREHOUSE	WAREHOUSE	1	INTERIOR	Negative	0
110	8/25/2022	DOOR JAMB	METAL	BLACK	INTACT	D	15006 E NELSON AVE WAREHOUSE	WAREHOUSE	1	INTERIOR	Negative	0.01
111	8/25/2022	DOOR JAMB	METAL	BLUE	INTACT	B	15006 E NELSON AVE WAREHOUSE	WAREHOUSE	1	INTERIOR	Negative	0.02
112	8/25/2022	DOOR	METAL	BLUE	INTACT	B	15006 E NELSON AVE WAREHOUSE	WAREHOUSE	1	INTERIOR	Negative	0
113	8/25/2022	WALL	BRICK	BLUE	INTACT	B	15006 E NELSON AVE WAREHOUSE	WAREHOUSE	1	INTERIOR	Negative	0
114	8/25/2022	WALL	BRICK	BLUE	INTACT	B	15006 E NELSON AVE WAREHOUSE	WAREHOUSE	1	INTERIOR	Negative	0
115	8/25/2022	CONDUIT	METAL	BLUE	INTACT	C	15006 E NELSON AVE WAREHOUSE	WAREHOUSE	1	INTERIOR	Negative	0
116	8/25/2022	PIPE	METAL	BLUE	INTACT	C	15006 E NELSON AVE WAREHOUSE	WAREHOUSE	1	INTERIOR	Negative	0
117	8/25/2022	WALL	BRICK	WHITE	INTACT	D	15006 E NELSON AVE WAREHOUSE	WAREHOUSE	1	INTERIOR	Negative	0
118	8/25/2022	CONDUIT	METAL	WHITE	INTACT	D	15006 E NELSON AVE WAREHOUSE	WAREHOUSE	1	INTERIOR	Negative	0
119	8/25/2022	CEILING	WOOD	WHITE	INTACT	C	15006 E NELSON AVE WAREHOUSE	WAREHOUSE	1	INTERIOR	Negative	0
120	8/25/2022	CEILING	WOOD	WHITE	INTACT	C	15006 E NELSON AVE WAREHOUSE	WAREHOUSE	1	INTERIOR	Negative	0
121	8/25/2022	BEAM	WOOD	WHITE	INTACT	C	15006 E NELSON AVE WAREHOUSE	WAREHOUSE	1	INTERIOR	Negative	0
122	8/25/2022	BEAM	WOOD	WHITE	INTACT	C	15006 E NELSON AVE WAREHOUSE	WAREHOUSE	1	INTERIOR	Negative	0
123	8/25/2022	SAFETY LINE	CONCRETE	YELLOW	INTACT	C	15006 E NELSON AVE WAREHOUSE	WAREHOUSE	1	INTERIOR	Negative	0
124	8/25/2022	WALL	WOOD	TAN	INTACT	B	15010 MOBILE OFFICE	WAREHOUSE	1	EXTERIOR	Negative	0
125	8/25/2022	WALL TRIM	WOOD	BROWN	INTACT	B	15010 MOBILE OFFICE	WAREHOUSE	1	EXTERIOR	Negative	0
126	8/25/2022	FASCIA	WOOD	BROWN	INTACT	B	15010 MOBILE OFFICE	WAREHOUSE	1	EXTERIOR	Negative	0
127	8/25/2022	FLASHING	METAL	BROWN	INTACT	B	15010 MOBILE OFFICE	WAREHOUSE	1	EXTERIOR	Negative	0
128	8/25/2022	STAIRS	METAL	BROWN	INTACT	B	15010 MOBILE OFFICE	WAREHOUSE	1	EXTERIOR	Negative	0
129	8/25/2022	STAIRS	METAL	BLACK	INTACT	B	15010 MOBILE OFFICE	WAREHOUSE	1	EXTERIOR	Negative	0
130	8/25/2022	DOOR	WOOD	BROWN	INTACT	B	15010 MOBILE OFFICE	WAREHOUSE	1	EXTERIOR	Negative	0

READING NO.	TESTING DATE	COMPONENT	SUBSTRATE	COLOR	CONDITION	SIDE	BUILDING	ROOM	FLOOR	MISC.	RESULTS	LEAD (mg/cm <sup>2</sup> )
131	8/25/2022	DOOR JAMB	WOOD	BROWN	INTACT	B	15010 MOBILE OFFICE	WAREHOUSE	1	EXTERIOR	Negative	0
132	8/25/2022	WINDOW FRAME	WOOD	BROWN	INTACT	B	15010 MOBILE OFFICE	WAREHOUSE	1	EXTERIOR	Negative	0
133	8/25/2022	HVAC	METAL	GRAY	INTACT	A	15010 MOBILE OFFICE	WAREHOUSE	1	EXTERIOR	Negative	0
134	8/25/2022	WALL	WOOD	TAN	INTACT	A	15010 MOBILE OFFICE	WAREHOUSE	1	EXTERIOR	Negative	0
135	8/25/2022	WALL TRIM	WOOD	BROWN	INTACT	A	15010 MOBILE OFFICE	WAREHOUSE	1	EXTERIOR	Negative	0
136	8/25/2022	FASCIA	WOOD	BROWN	INTACT	A	15010 MOBILE OFFICE	WAREHOUSE	1	EXTERIOR	Negative	0
137	8/25/2022	12x63 FRAME	METAL	BROWN	INTACT	A	15010 MOBILE OFFICE	WAREHOUSE	1	EXTERIOR	Negative	0
138	8/25/2022	12x63 FRAME	METAL	BROWN	INTACT	A	15010 MOBILE OFFICE	WAREHOUSE	1	EXTERIOR	Negative	0
139	8/25/2022	T-GRID	METAL	OFF WHITE	INTACT	A	15010 MOBILE OFFICE	1	1	INTERIOR	Negative	0
140	8/25/2022	DOOR	WOOD	BROWN	INTACT	A	15010 MOBILE OFFICE	1	1	INTERIOR	Negative	0
141	8/25/2022	DOOR JAMB	METAL	BROWN	INTACT	A	15010 MOBILE OFFICE	1	1	INTERIOR	Negative	0
142	8/25/2022	DOOR JAMB	WOOD	BLUE, DARK	INTACT	CENTER	15010 MOBILE OFFICE	3	1	INTERIOR	Negative	0
143	8/25/2022	DOOR	WOOD	BLUE, DARK	INTACT	CENTER	15010 MOBILE OFFICE	3	1	INTERIOR	Negative	0
144	8/25/2022	WINDOW FRAME	METAL	BROWN, DARK	INTACT	CENTER	15010 MOBILE OFFICE	3	1	INTERIOR	Negative	< LOD
145	8/25/2022	LIGHT FIXTURE	METAL	WHITE	INTACT	CENTER	15010 MOBILE OFFICE	3	1	INTERIOR	Negative	0
146	8/25/2022	SHOWER	FIBERGLASS	WHITE	INTACT	CENTER	15010 MOBILE OFFICE	RR	1	INTERIOR	Negative	0
147	8/25/2022	SINK	PORCELAIN	WHITE	INTACT	CENTER	15010 MOBILE OFFICE	RR	1	INTERIOR	Negative	0.01
148	8/25/2022	TOILET	PORCELAIN	WHITE	INTACT	CENTER	15010 MOBILE OFFICE	RR	1	INTERIOR	Negative	0.01
149	8/25/2022	DOOR	WOOD	BROWN, DARK	INTACT	C	15010 MOBILE OFFICE	4	1	INTERIOR	Negative	0
150	8/25/2022	DOOR JAMB	METAL	BROWN, DARK	INTACT	C	15010 MOBILE OFFICE	4	1	INTERIOR	Negative	0.04
151	8/25/2022	WINDOW FRAME	METAL	BROWN, DARK	INTACT	C	15010 MOBILE OFFICE	4	1	INTERIOR	Negative	0
152	8/25/2022	DOOR	WOOD	GRAY	INTACT	B	15010 MOBILE OFFICE	HALLWAY	1	INTERIOR	LCS	0.4
153	8/25/2022	DOOR JAMB	METAL	BLACK	INTACT	B	15010 MOBILE OFFICE	HALLWAY	1	INTERIOR	Negative	0
154	8/25/2022		METAL			CALIBRATE					QA	1.1
155	8/25/2022					CALIBRATE					QA	1
156	8/25/2022					CALIBRATE					QA	1
157	8/25/2022					CALIBRATE					QA	1.1
158	8/25/2022					CALIBRATE					QA	1.92
159	8/25/2022					CALIBRATE					QA	1.1
160	8/25/2022					CALIBRATE					QA	1
161	8/25/2022					CALIBRATE					QA	1
162	8/25/2022	COLUMN	METAL	GRAY	INTACT	A	15100 WAREHOUSE	WAREHOUSE	1	INTERIOR	LCS	0.14
163	8/25/2022	WALL FRAME	METAL	BROWN	INTACT	A	15100 WAREHOUSE	WAREHOUSE	1	INTERIOR	Negative	0.07
164	8/25/2022	WALL PANEL	WOOD	BLACK	INTACT	A	15100 WAREHOUSE	WAREHOUSE	1	INTERIOR	Negative	0.06
165	8/25/2022	SLIDING DOOR	METAL	GRAY	INTACT	A	15100 WAREHOUSE	WAREHOUSE	1	INTERIOR	Negative	0
166	8/25/2022	SLIDING DOOR	METAL	GREEN, LIGHT	INTACT	A	15100 WAREHOUSE	WAREHOUSE	1	INTERIOR	Negative	0
167	8/25/2022	SLIDING DOOR JAMB	METAL	TAN	INTACT	A	15100 WAREHOUSE	WAREHOUSE	1	INTERIOR	Negative	< LOD
168	8/25/2022	WINDOW FRAME	METAL	GRAY	INTACT	A	15100 WAREHOUSE	WAREHOUSE	1	INTERIOR	Negative	0.04
169	8/25/2022	COLUMN	METAL	GRAY	INTACT	D	15100 WAREHOUSE	WAREHOUSE	1	INTERIOR	LCS	0.18
170	8/25/2022	PIPE	METAL	YELLOW	INTACT	D	15100 WAREHOUSE	WAREHOUSE	1	INTERIOR	LBP	1.5
171	8/25/2022	PIPE	METAL	GREEN	INTACT	D	15100 WAREHOUSE	WAREHOUSE	1	INTERIOR	LCS	0.1
172	8/25/2022	CABINET	METAL	GRAY	INTACT	D	15100 WAREHOUSE	WAREHOUSE	1	INTERIOR	Negative	0.01
173	8/25/2022	WALL PANEL	WOOD	WHITE	INTACT	D	15100 WAREHOUSE	WAREHOUSE	1	INTERIOR	LCS	0.1
174	8/25/2022	WALL FRAME	METAL	GRAY	INTACT	D	15100 WAREHOUSE	WAREHOUSE	1	INTERIOR	Negative	0.05
175	8/25/2022	COLUMN	METAL	RED	INTACT	D	15100 WAREHOUSE	WAREHOUSE	1	INTERIOR	Negative	0.06
176	8/25/2022	SHIPPING DOOR JAMB	METAL	YELLOW	INTACT	D	15100 WAREHOUSE	WAREHOUSE	1	INTERIOR	Negative	0.06
177	8/25/2022	BEAM	METAL	GRAY, DARK	INTACT	D	15100 WAREHOUSE	WAREHOUSE	1	INTERIOR	LCS	0.18
178	8/25/2022	COLUMN	METAL	GRAY	INTACT	D	15100 WAREHOUSE	WAREHOUSE	1	INTERIOR	Negative	0.08
179	8/25/2022	COLUMN	METAL	GRAY	INTACT	C	15100 WAREHOUSE	WAREHOUSE	1	INTERIOR	Negative	0
180	8/25/2022	POST	METAL	GRAY	INTACT	C	15100 WAREHOUSE	WAREHOUSE	1	INTERIOR	LCS	0.1
181	8/25/2022	WALL FRAME	METAL	YELLOW	INTACT	C	15100 WAREHOUSE	WAREHOUSE	1	INTERIOR	Negative	0.08
182	8/25/2022	CEILING BEAM	METAL	BROWN	INTACT	C	15100 WAREHOUSE	WAREHOUSE	1	INTERIOR	LCS	0.1
183	8/25/2022	CEILING BEAM	METAL	BROWN	INTACT	C	15100 WAREHOUSE	WAREHOUSE	1	INTERIOR	Negative	0.05
184	8/25/2022	WALL	DRYWALL	WHITE	INTACT	B	15100 WAREHOUSE	WAREHOUSE	1	INTERIOR	Negative	0
185	8/25/2022	DOOR	WOOD	WHITE	INTACT	B	15100 WAREHOUSE	WAREHOUSE	1	INTERIOR	Negative	0
186	8/25/2022	DOOR JAMB	WOOD	WHITE	INTACT	B	15100 WAREHOUSE	WAREHOUSE	1	INTERIOR	Negative	0
187	8/25/2022	WINDOW FRAME	WOOD	WHITE	INTACT	B	15100 WAREHOUSE	WAREHOUSE	1	INTERIOR	Negative	0
188	8/25/2022	WALL	DRYWALL	WHITE	INTACT	B	15100 WAREHOUSE	LOBBY	1	INTERIOR	Negative	0
189	8/25/2022	CEILING	DRYWALL	WHITE	INTACT	B	15100 WAREHOUSE	LOBBY	1	INTERIOR	Negative	0
190	8/25/2022	BASEBOARD	WOOD	WHITE	INTACT	D	15100 WAREHOUSE	LOBBY	1	INTERIOR	Negative	0
191	8/25/2022	WINDOW FRAME	WOOD	WHITE	INTACT	D	15100 WAREHOUSE	LOBBY	1	INTERIOR	Negative	0
192	8/25/2022	WALL	DRYWALL	WHITE	INTACT	A	15100 WAREHOUSE	BREAK	1	INTERIOR	Negative	0
193	8/25/2022	DOOR	METAL	WHITE	INTACT	D	15100 WAREHOUSE	BREAK	1	INTERIOR	Negative	0
194	8/25/2022	DOOR JAMB	METAL	BEIGE	INTACT	D	15100 WAREHOUSE	BREAK	1	INTERIOR	Negative	0
195	8/25/2022	WALL	DRYWALL	WHITE	INTACT	A	15100 WAREHOUSE	NORTH OFFICE	1	INTERIOR	Negative	0

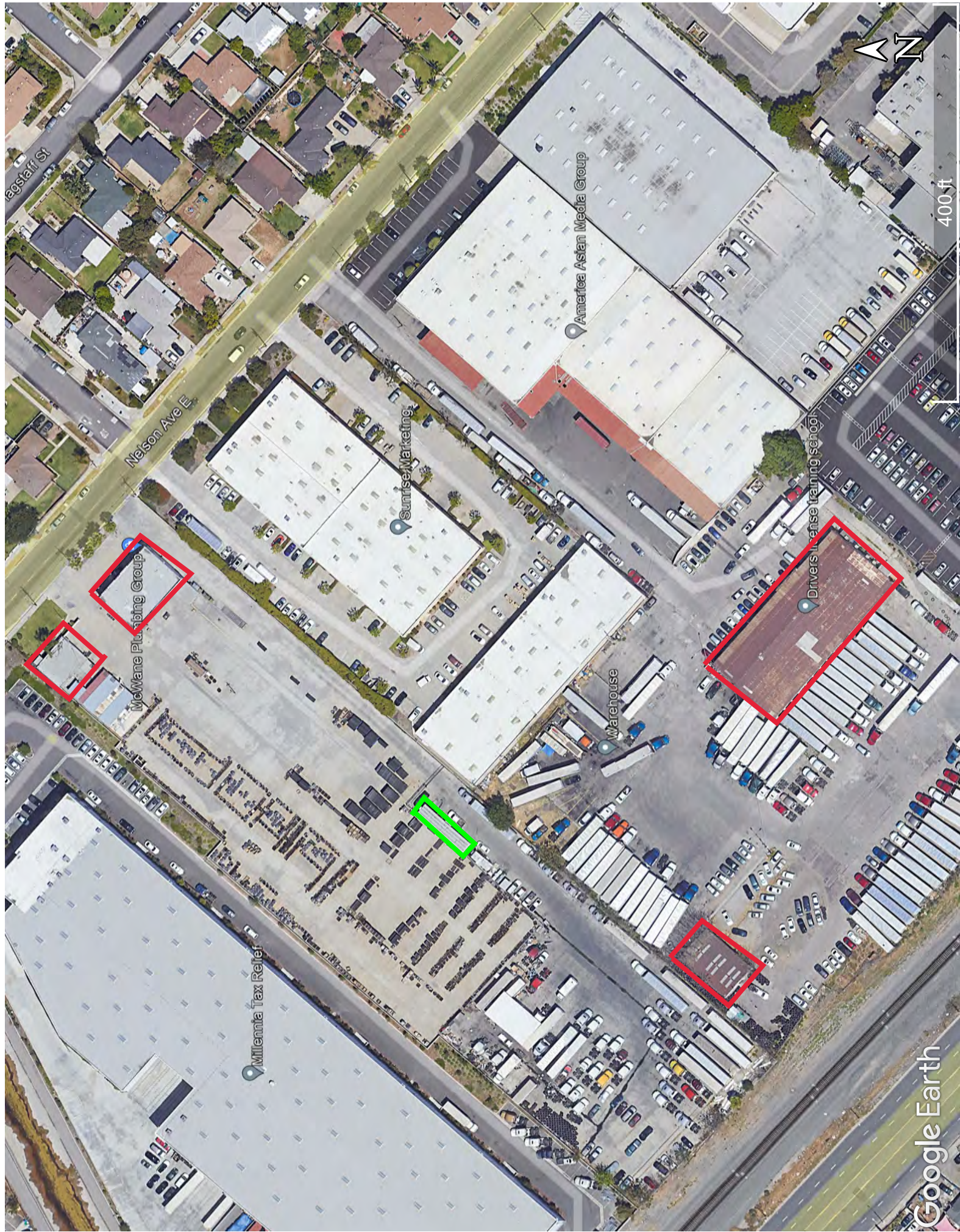


READING NO.	TESTING DATE	COMPONENT	SUBSTRATE	COLOR	CONDITION	SIDE	BUILDING	ROOM	FLOOR	MISC.	RESULTS	LEAD (mg/cm <sup>2</sup> )
196	8/25/2022	BASEBOARD	WOOD	WHITE	INTACT	A	15100 WAREHOUSE	NORTH OFFICE	1	INTERIOR	Negative	0
197	8/25/2022	FLOOR	CONCRETE	GRAY, DARK	INTACT	A	15100 WAREHOUSE	NORTH OFFICE	1	INTERIOR	Negative	0
198	8/25/2022	WALL	DRYWALL	WHITE	INTACT	C	15100 WAREHOUSE	DISPATCH OFFICE	1	INTERIOR	Negative	0
199	8/25/2022	DOOR JAMB	WOOD	WHITE	INTACT	C	15100 WAREHOUSE	DISPATCH OFFICE	1	INTERIOR	Negative	0
200	8/25/2022	CEILING PANEL 2x4	FIBEROUS	WHITE	INTACT	C	15100 WAREHOUSE	DISPATCH OFFICE	1	INTERIOR	Negative	0
201	8/25/2022	WALL	DRYWALL	WHITE	INTACT	C	15100 WAREHOUSE	STORAGE	1	INTERIOR	Negative	0
202	8/25/2022	SHELF	WOOD	WHITE	INTACT	C	15100 WAREHOUSE	STORAGE	1	INTERIOR	Negative	0
203	8/25/2022	DOOR	WOOD	WHITE	INTACT	D	15100 WAREHOUSE	STORAGE	1	INTERIOR	Negative	0
204	8/25/2022	CEILING	WOOD	WHITE	INTACT	D	15100 WAREHOUSE	WEST MULTI OFFICE	1	INTERIOR	Negative	0
205	8/25/2022	WINDOW FRAME	WOOD	WHITE	INTACT	D	15100 WAREHOUSE	WEST MULTI OFFICE	1	INTERIOR	Negative	0
206	8/25/2022	WALL	DRYWALL	WHITE	INTACT	A	15100 WAREHOUSE	HALLWAY	1	INTERIOR	Negative	0
207	8/25/2022	CEILING	DRYWALL	WHITE	INTACT	A	15100 WAREHOUSE	HALLWAY	1	INTERIOR	Negative	0
208	8/25/2022	BASEBOARD	WOOD	WHITE	INTACT	A	15100 WAREHOUSE	HALLWAY	1	INTERIOR	Negative	0
209	8/25/2022	WALL	DRYWALL	GREEN, LIGHT	INTACT	C	15100 WAREHOUSE	CENTER OFFICE	1	INTERIOR	Negative	0
210	8/25/2022	WINDOW FRAME	WOOD	GREEN, LIGHT	INTACT	B	15100 WAREHOUSE	CENTER OFFICE	1	INTERIOR	Negative	0
211	8/25/2022	DOOR	WOOD	BEIGE	INTACT	C	15100 WAREHOUSE	CENTER OFFICE	1	INTERIOR	Negative	0
212	8/25/2022	DOOR JAMB	WOOD	BEIGE	INTACT	C	15100 WAREHOUSE	MRR	1	INTERIOR	Negative	0
213	8/25/2022	WALL	DRYWALL	WHITE	INTACT	C	15100 WAREHOUSE	MRR	1	INTERIOR	Negative	0
214	8/25/2022	CEILING	DRYWALL	WHITE	INTACT	C	15100 WAREHOUSE	MRR	1	INTERIOR	Negative	0
215	8/25/2022	SINK	PORCELAIN	WHITE	INTACT	C	15100 WAREHOUSE	MRR	1	INTERIOR	Negative	0.03
216	8/25/2022	TOILET	PORCELAIN	WHITE	INTACT	C	15100 WAREHOUSE	MRR	1	INTERIOR	Negative	0.01
217	8/25/2022	TOILET	PORCELAIN	WHITE	INTACT	A	15100 WAREHOUSE	MRR	1	INTERIOR	Negative	0
218	8/25/2022	SINK	PORCELAIN	WHITE	INTACT	A	15100 WAREHOUSE	MRR	1	INTERIOR	Negative	0.03
219	8/25/2022	WALL	DRYWALL	GREEN	INTACT	D	15100 WAREHOUSE	MRR	1	INTERIOR	Negative	0
220	8/25/2022	CEILING	DRYWALL	GREEN	INTACT	D	15100 WAREHOUSE	MRR	1	INTERIOR	Negative	0
221	8/25/2022	DOOR JAMB	WOOD	WHITE	INTACT	D	15100 WAREHOUSE	MRR	1	INTERIOR	Negative	0
222	8/25/2022	DOOR	WOOD	WHITE	INTACT	C	15100 WAREHOUSE	SOUTH OFFICE	1	INTERIOR	Negative	0
223	8/25/2022	WINDOW FRAME	WOOD	WHITE	INTACT	C	15100 WAREHOUSE	SOUTH OFFICE	1	INTERIOR	Negative	0
224	8/25/2022	WALL	DRYWALL	WHITE	INTACT	C	15100 WAREHOUSE	SOUTH OFFICE	1	INTERIOR	Negative	0
225	8/25/2022	CEILING	DRYWALL	WHITE	INTACT	C	15100 WAREHOUSE	SOUTH OFFICE	1	INTERIOR	Negative	0
226	8/25/2022	BASEBOARD	WOOD	WHITE	INTACT	C	15100 WAREHOUSE	SOUTH OFFICE	1	INTERIOR	Negative	0
227	8/25/2022	WALL	DRYWALL	BEIGE	INTACT	B	15100 WAREHOUSE	EAST OFFICE	1	INTERIOR	Negative	0
228	8/25/2022	CEILING	DRYWALL	BEIGE	INTACT	B	15100 WAREHOUSE	EAST OFFICE	1	INTERIOR	Negative	0
229	8/25/2022	DOOR	METAL	GRAY	INTACT	A	15100 WAREHOUSE	HALLWAY	1	INTERIOR	Negative	0
230	8/25/2022	DOOR JAMB	METAL	WHITE	INTACT	A	15100 WAREHOUSE	HALLWAY	1	INTERIOR	Negative	0
231	8/25/2022	DOOR JAMB	WOOD	WHITE	INTACT	A	15100 WAREHOUSE	HALLWAY	1	INTERIOR	Negative	0
232	8/25/2022	WALL	METAL	TAN	INTACT	A	15100 WAREHOUSE	HALLWAY	1	INTERIOR	Negative	0
233	8/25/2022	SHIPPING DOOR	METAL	TAN	INTACT	A	15100 WAREHOUSE	HALLWAY	1	INTERIOR	Negative	0.01
234	8/25/2022	WINDOW FRAME	METAL	TAN	INTACT	A	15100 WAREHOUSE	HALLWAY	1	EXTERIOR	Negative	0.03
235	8/25/2022	DOWN SPOUT	METAL	TAN	INTACT	A	15100 WAREHOUSE	HALLWAY	1	EXTERIOR	Negative	0.2
236	8/25/2022	GUTTER	METAL	TAN	INTACT	A	15100 WAREHOUSE	HALLWAY	1	EXTERIOR	Negative	0.08
237	8/25/2022	UPPER WINDOWS	METAL	TAN	INTACT	A	15100 WAREHOUSE	HALLWAY	1	EXTERIOR	LBP	2
238	8/25/2022	WALL	METAL	TAN	INTACT	A	15100 WAREHOUSE	HALLWAY	1	EXTERIOR	LCS	0.1
239	8/25/2022	SHIPPING DOOR	METAL	TAN	INTACT	D	15100 WAREHOUSE	HALLWAY	1	EXTERIOR	LCS	0.14
240	8/25/2022	PARKING STRIPE	CONCRETE	YELLOW	DETERIORATED	D	15100 WAREHOUSE	HALLWAY	1	EXTERIOR	Negative	0
241	8/25/2022	WALL	METAL	TAN	INTACT	C	15100 WAREHOUSE	HALLWAY	1	EXTERIOR	Negative	0.06
242	8/25/2022	SHIPPING DOOR	METAL	TAN	INTACT	C	15100 WAREHOUSE	HALLWAY	1	EXTERIOR	LCS	0.11
243	8/25/2022	SHIPPING DOOR	METAL	TAN	INTACT	C	15100 WAREHOUSE	HALLWAY	1	EXTERIOR	LCS	0.22
244	8/25/2022	SHIPPING DOOR JAMB	METAL	YELLOW	INTACT	C	15100 WAREHOUSE	HALLWAY	1	EXTERIOR	LCS	0.16
245	8/25/2022	WINDOW FRAME	WOOD	WHITE	DETERIORATED	C	15100 WAREHOUSE	HALLWAY	1	EXTERIOR	Negative	0
246	8/25/2022	DOOR	WOOD	WHITE	INTACT	C	15100 WAREHOUSE	HALLWAY	1	EXTERIOR	Negative	0
247	8/25/2022	WALL	WOOD	TAN	INTACT	C	15100 WAREHOUSE	HALLWAY	1	EXTERIOR	Negative	0
248	8/25/2022	WALL	METAL	TAN	INTACT	B	15100 WAREHOUSE	HALLWAY	1	EXTERIOR	Negative	0.07
249	8/25/2022	WINDOW FRAME	METAL	TAN	INTACT	B	15100 WAREHOUSE	HALLWAY	1	EXTERIOR	LCS	0.1
250	8/25/2022	HVAC SHELF	METAL	TAN	INTACT	B	15100 WAREHOUSE	HALLWAY	1	EXTERIOR	Negative	0
251	8/25/2022	DOOR	METAL	OFF WHITE	INTACT	B	15100 WAREHOUSE	HALLWAY	1	EXTERIOR	Negative	0
252	8/25/2022	WALL	METAL	TAN	INTACT	A	15100 STORAGE	HALLWAY	1	EXTERIOR	Negative	0.06
253	8/25/2022	WALL	METAL	TAN	INTACT	A	15100 STORAGE	HALLWAY	1	EXTERIOR	Negative	0.01
254	8/25/2022	WALL	METAL	TAN	INTACT	B	15100 STORAGE	HALLWAY	1	EXTERIOR	Negative	0.05
255	8/25/2022	FENCE	METAL	BLACK	INTACT	C	15100 STORAGE	HALLWAY	1	EXTERIOR	Negative	0
256	8/25/2022	WALL	DRYWALL	WHITE	INTACT	C	15100 STORAGE	HALLWAY	1	EXTERIOR	Negative	0
257	8/25/2022					CALIBRATE					QA	1
258	8/25/2022					CALIBRATE					QA	1
259	8/25/2022					CALIBRATE					QA	1

Notes:

READING NO.	TESTING DATE	COMPONENT	SUBSTRATE	COLOR	CONDITION	SIDE	BUILDING	ROOM	FLOOR	MISC.	RESULTS	LEAD (mg/cm <sup>2</sup> )
CITY OF INDUSTRY XRF - X-ray fluorescence spectrum analyzer mg/cm <sup>2</sup> - milligrams per square centimeter LOD - Limit of Detection Null - Incomplete reading Misc. - Miscellaneous OA - Quality Assurance Reading LCSC - Lead-Containing Surface Coating (8 CCR 1532.1), lead present at Limit of Detection (0.1 mg/cm <sup>2</sup> ) up to 0.7 mg/cm <sup>2</sup> in Los Angeles County. LBP - Lead-Based Paint, lead is present at 1.0 mg/cm <sup>2</sup> or greater LBS - Lead-Bearing Substance (Los Angeles County), lead is present at 0.70 mg/cm <sup>2</sup> or greater												

**APPENDIX B**  
**POSITIVE XRF LOCATION MAP**



Magstaff St

Nelson Ave E

McWane Plumbing Group

Sunrise Marketing

America Asian Media Group

Warehouse

Drivers License Training School

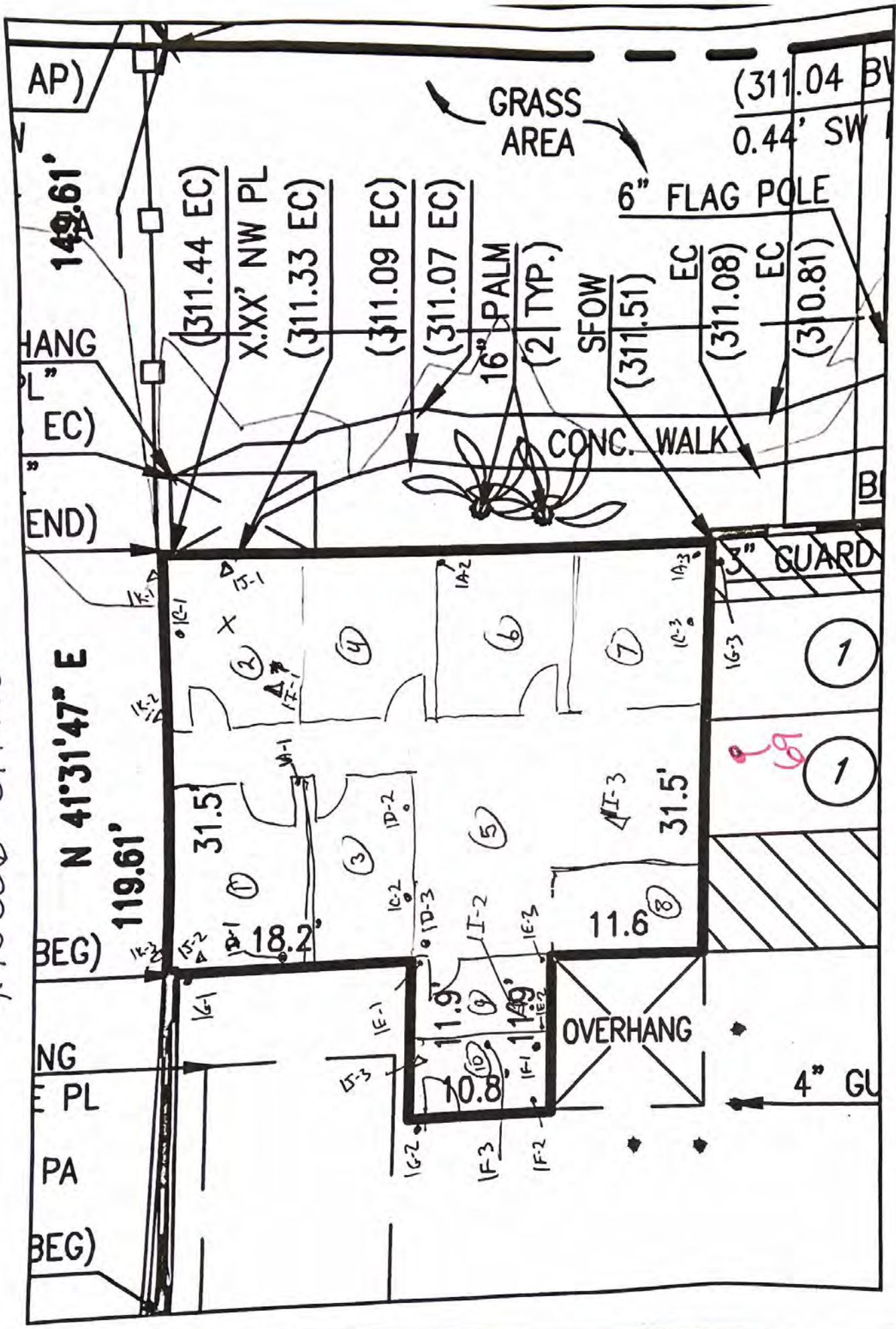
Millenia Tax Relief

400 ft

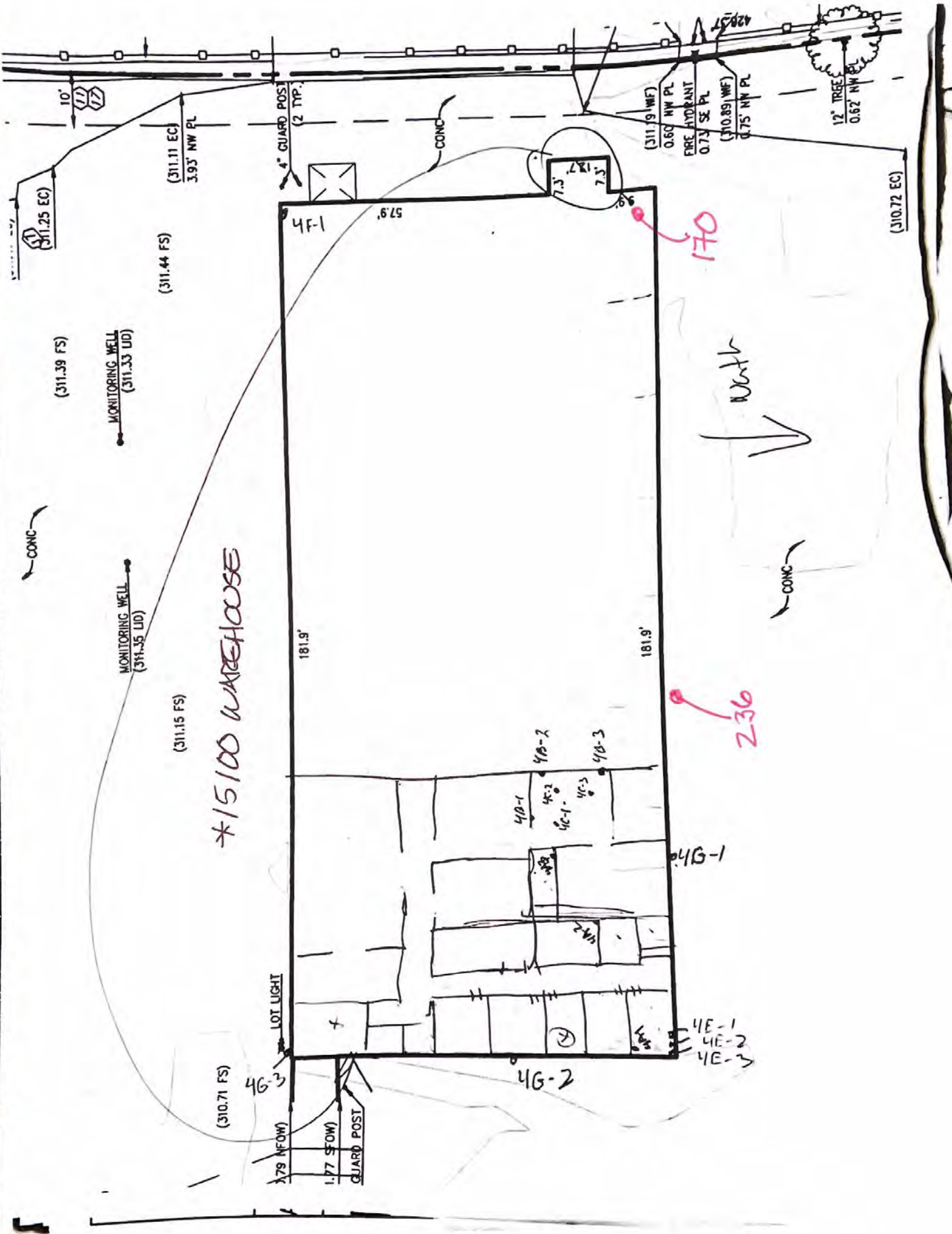


Google Earth

\* 15006 OFFICE



\*15100 WAREHOUSE



(311.39 FS)

MONITORING WELL  
(311.33 UD)

MONITORING WELL  
(311.35 UD)

(311.44 FS)

(311.15 FS)

(310.71 FS)

1.79 (FOW)

1.77 (FOW)

GUARD POST

LOT LIGHT

4G-3

181.9'

4F-1

57.9'

4G-2

4A-1

4A-2

4A-3

4B-3

4B-1

4E-1  
4E-2  
4E-3

181.9'

(310.72 EC)

12" TREE  
0.62' NW PL

(311.79 WF)  
0.60' NW PL  
FIRE HYDRANT  
0.73' SE PL  
(310.89 WF)  
0.75' NW PL

170

WATER

236

CONC

CONC

CONC

10'

11  
12

(311.11 EC)  
3.95' NW PL

4" GUARD POST  
(2 TYP.)

7.3'  
7.3'

420.57

**APPENDIX C**  
**CONSULTANT CERTIFICATIONS**



# LEAD-RELATED CONSTRUCTION CERTIFICATE

INDIVIDUAL:	CERTIFICATE TYPE:	NUMBER:	EXPIRATION DATE:
 <b>Stephen Reese</b>	Lead Inspector/Assessor	LRC-000006759	11/25/2023
	Lead Project Monitor	LRC-000006758	11/25/2023

Disclaimer: This document alone should not be relied upon to confirm certification status. Compare the individual's photo and name to another valid form of government issued photo identification. Verify the individual's certification status by searching for Lead-Related Construction Professionals at [www.cdph.ca.gov/programs/clppb](http://www.cdph.ca.gov/programs/clppb) or calling (800) 597-LEAD





STATE OF CALIFORNIA  
DEPARTMENT OF PUBLIC HEALTH



# LEAD-RELATED CONSTRUCTION CERTIFICATE

**INDIVIDUAL:**



**Peter Kolesar**

**CERTIFICATE TYPE:**

Lead Inspector/Assessor

Lead Project Monitor

**NUMBER:**

LRC-00007820

LRC-00007819

**EXPIRATION DATE:**

12/3/2022

12/3/2022

Disclaimer: This document alone should not be relied upon to confirm certification status. Compare the individual's photo and name to another valid form of government issued photo identification. Verify the individual's certification status by searching for Lead-Related Construction Professionals at [www.cdph.ca.gov/programs/clppb](http://www.cdph.ca.gov/programs/clppb) or calling (800) 597-LEAD

**ATTACHMENT C**  
**QUALIFICATIONS**

United States Department of Commerce  
National Institute of Standards and Technology



---

**Certificate of Accreditation to ISO/IEC 17025:2017**

---

NVLAP LAB CODE: 500079-0

**AIH Laboratory**  
Anaheim, CA

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

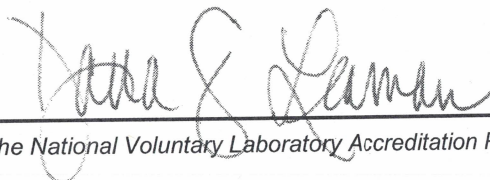
**Asbestos Fiber Analysis**

*This laboratory is accredited in accordance with the recognized International Standard ISO/IEC 17025:2017.  
This accreditation demonstrates technical competence for a defined scope and the operation of a laboratory quality  
management system (refer to joint ISO-ILAC-IAF Communique dated January 2009).*

---

2022-10-01 through 2023-09-30

*Effective Dates*



---

For the National Voluntary Laboratory Accreditation Program

SCOPE OF ACCREDITATION TO ISO/IEC 17025:2017

**AIH Laboratory**  
2556 W. Woodland Dr.  
Anaheim, CA 92801  
Mr. Zubair M. Ahmed  
Phone: 206-979-1415  
Email: bestoflive@live.com  
<http://www.aihlab.com>

**ASBESTOS FIBER ANALYSIS**

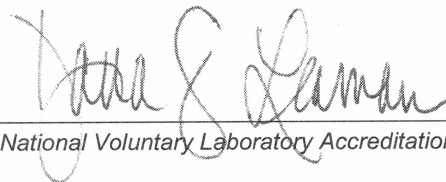
**NVLAP LAB CODE 500079-0**

**Bulk Asbestos Analysis**

<u>Code</u>	<u>Description</u>
18/A01	EPA -- 40 CFR Appendix E to Subpart E of Part 763, Interim Method of the Determination of Asbestos in Bulk Insulation Samples
18/A03	EPA 600/R-93/116: Method for the Determination of Asbestos in Bulk Building Materials

**Airborne Asbestos Analysis**

<u>Code</u>	<u>Description</u>
18/A02	U.S. EPA's "Interim Transmission Electron Microscopy Analytical Methods-Mandatory and Nonmandatory-and Mandatory Section to Determine Completion of Response Actions" as found in 40 CFR, Part 763, Subpart E, Appendix A.



For the National Voluntary Laboratory Accreditation Program

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



**Craig A. Metheny**  
Name

Certification No. **08-4421**

Expires on **09/18/22**

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

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

**Jesus D. Escalante**

Name



Certification No. **22-7277**

Expires on **12/16/23**

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