



Intertek-PSI
4703 Tidewater Ave. Suite B
Oakland, CA 94601

Tel +1 510 434 9200
Fax +1 510 434 9696
intertek.com/building

Walter Kolon
Facility Project Specialist II
Mendocino County
Executive Office Facility & Fleet Division
851 Low Gap Road
Ukiah, CA 95482

March 5, 2021

Subject: Limited Hazardous Materials Survey

Veterans Services ADA Project
405 Observatory Avenue
Ukiah, CA
PSI Project No. 05822033

Dear Mr. Kolon:

This letter presents a summary of the limited asbestos and lead survey performed by Professional Service Industries, Inc. (PSI) at the Veterans Services Building located at 405 Observatory Avenue in Ukiah, California. The sampling activities were performed on February 24, 2021, by PSI representative Antonio Navarro, under the technical guidance of PSI Principal Consultant L. J. Stallworth. Enclosed is a summary of the assessment activities conducted by PSI at the above referenced location.

LIMITED ASBESTOS SAMPLING

A material is considered by the Environmental Protection Agency (EPA) to be asbestos-containing if at least one sample collected from an area shows asbestos present in an amount greater than one percent (>1%). In the State of California, the Department of Occupational Safety and Health considers a material to be asbestos-containing construction material (ACCM) if at least one sample collected from the area shows asbestos present in an amount greater than one-tenth of one percent (>0.1%). Specific removal requirements apply if ACM will be disturbed during maintenance, renovation, or demolition activities. Results are summarized in the table below. Sample locations are, for the most part, indicated in the table where samples were collected. A copy of the laboratory result is provided in the appendix of this report.

Naturally occurring asbestos (NOA) has been identified throughout California. The Asbestos Airborne Toxic Control Measure (ATCM) for Construction, Grading, Quarrying and Surface Mining Operations (17 CCR Section 93105) was intended to reduce public exposure to NOA from construction and mining activities that emit dust which may contain NOA. The ATCM requires regulated operations engaged in road construction and maintenance activities, construction and grading operations, and quarrying and surface mining operations in areas where NOA is likely to be found. If identified, the regulation includes requirements for the Contractor to employ dust mitigation measures in order to reduce and control dust emissions. Depending on the proposed use of the site and future construction activities, sampling at depth may be required to verify if NOA is present at the site.

In addition, if asbestos concentrations exceed 1% asbestos, all work must be performed utilizing Cal/OSHA Class II work procedures with AHERA-trained Workers and Supervisors. Contractors performing work that will impact NOA-containing soil are required to comply with Cal/OSHA asbestos requirements.

PSI collected nine (9) samples for asbestos from the site and all were analyzed for asbestos content. The materials





samplings included drywall and joint compound, asphalt roofing shingles, exterior caulking, concrete, and paint. Asbestos containing materials were not identified in the sampled materials. Analysis of the building material samples was performed at PSI's Laboratory in Pittsburgh, PA. Sample analyses were performed in accordance with the EPA Standard Method for Determination of Asbestos in Bulk Building Materials (EPA / 600/R-93/116 July 1993).

PSI collected one (1) composite soil sample within the proposed excavation area for asbestos analysis. Sampling of soils for asbestos was performed in a fashion designed to minimize exposure to the surveyor or the occupants of surrounding buildings to airborne asbestos fibers. Samples were collected by utilizing a hand auger in order to bore to up to one foot below ground surface (bgs). Three (3) sub-samples were collected within the proposed excavation area and composited into one sample. Upon collection, the sample was placed in a Ziploc plastic bag and transported to Micro under chain-of-custody documentation to be analyzed for asbestos using the CARB 435 method of analysis.

Materials containing asbestos are indicated in bold:

TABLE 1 – ASBESTOS RESULTS SUMMARY

MATERIAL I.D.	MATERIAL DESCRIPTION	SAMPLE LOCATIONS	F/NF ¹	NESHAP CATEGORY ²	CONDITION	NO. OF SAMPLES	% ACM	QUANTITY
FEBRUARY 24, 2021								
6	Gray Concrete on Driveway	405 Driveway	NF	NA	Good	3	ND	NA
7	Black Asphalt	405 Driveway	NF	NA	Good	3	ND	NA
8	Plaster Wall	Interior of Entrance Door	F	NA	Good	3	ND	NA

TABLE 2 –SOIL SAMPLE ASBESTOS RESULTS SUMMARY

MATERIAL I.D.	MATERIAL DESCRIPTION	SAMPLE LOCATION	% ACM
2	Soil at excavation area	Exterior	ND

¹ F = Friable; NF = Non-friable

Friability is further defined in section 4.

² NESHAP Category= I, II or RACM

CHR = Chrysotile ND = No Asbestos Detected

LF = linear feet SF = square feet

PT = Point Count

Note that all sampled materials were found to be non-asbestos.

LEAD-CONTAINING PAINT SAMPLING

PSI collected two (2) samples of paint for lead content analysis. Analysis was performed by PSI's Laboratory in Pittsburgh, PA, a National Volunteer Laboratory Accreditation Program (NVLAP) accredited laboratory, using flame Atomic Absorption Spectroscopy (AAS) (Method 7420).

Federal efforts to regulate Lead Based Paint (LBP) began with the enactment of the Lead-Based Paint Poison Prevention Act (LBPPPA) in 1971. In 1973, the Consumer Product Safety Commission (CPSC) defined lead-based



paint as paint having lead content equal to or greater than 0.5 percent by weight in a dry film of newly applied paint. In 1978, the CPSC lowered the allowable lead levels in new paint to 0.06%. In 2011, the CPSC once again lowered the allowable lead levels in new paint or similar surface coatings to 0.009%.

The Housing and Urban Development Agency (HUD) developed guidelines relating to HUD facilities. The HUD guidelines specified lead content of 0.5% as an action level in determining the need for corrective action. Federal and State Occupational Health and Safety Administration (Fed-OSHA 29 CFR 1920.1025 and California-OSHA and California-OSHA under Title 8 CCR 1532.1) do not define the amount of lead in paint to a regulatory requirement; rather the activities or task define when the regulation is in effect. Both Federal and State standards use the term “trigger task” activities. In the work place, employers must make certain assumptions of the exposure levels and comply with the regulations based on the level of disturbance rather than the lead level.

The following materials were sampled for lead content as part of this survey. The results are summarized in the table below. A copy of the laboratory results is provided in Appendix B of this report. **Materials containing lead are indicated in bold:**

TABLE 2 – LEAD BULK SAMPLING RESULTS

SAMPLE NO.	MATERIAL DESCRIPTION	LOCATION	CONDITION	RESULT % LEAD BY WEIGHT
FEBRUARY 24, 2021				
1	White paint on interior plaster walls	Interior at renovation area	Good	0.31
2	Beige paint on exterior wood walls	Exterior at renovation area	Poor	0.86

< = Below analytical limit of detection

There is the possibility that other surfaces may contain levels of lead. Caution should be taken during demolition and renovation activities to prevent lead levels in generated airborne dust from painted surfaces from exceeding the Permissible Exposure Limit (PEL) as required by California/OSHA, Title 8, CCR Construction Safety Orders for Lead, Section 1532.1.

Title 17, California Code of Regulations (CCR), Division 1, Chapter 8: *Accreditation, Certification and Work Practices for Lead-Based Paint and Lead Hazards*, defines lead-based paint as paint or other surfacing coating that contain an amount of lead equal to, or in excess of one milligram per square centimeter (1.0 mg/cm²) or more than 0.5% by weight. The industry has interpreted this to mean that any detectable amount of lead is regulated. For example, employees who perform trigger tasks (such as manual demolition) are required to receive employer provided training, air monitoring, protective clothing, respirators, and hand washing facilities. In addition, there are standard work practices required such as the use of wet methods and HEPA vacuums.



WARRANTY

PSI warrants that the findings contained herein have been prepared with the level of care and skill ordinarily exercised by professionals practicing in the community. The scope of work addressed readily accessible and exposed interior building areas. Observation or sampling of inaccessible areas such as behind walls or within ductwork was not performed. PSI's activities also did not address determining the source of moisture intrusion into the referenced areas.

Client acknowledges that mold is ubiquitous to the environment with mold amplification often occurring when building materials are impacted by moisture. Client further acknowledges that site conditions are outside of PSI's control, and that mold amplification may occur, or continue to occur, in the presence of moisture. As such, PSI cannot and shall not be held responsible for the occurrence or reoccurrence of mold amplification.

No other warranties are implied or expressed.

USE BY THIRD PARTIES

This report was prepared pursuant to the contract PSI has with client. That contractual relationship included an exchange of information about the subject site that was unique and between PSI and its client and serves as the basis upon which this report was prepared. Because of the importance of the communication between PSI and its client, reliance or any use of this report by anyone other than the client for whom it was prepared, is prohibited and therefore not foreseeable to PSI.

Reliance or use by any such third party without explicit written authorization does not make said third party a third-party beneficiary to PSI's contract with client. Any such unauthorized reliance on or use of this report, including any of its information or conclusions, will be at third party's risk. For the same reasons, no warranties or representations, expressed or implied in this report, are made to any such third party.

UNIDENTIFIABLE CONDITIONS

This report is necessarily limited to the conditions observed and to the information available at the time of the work. Due to the nature of the work, there is a possibility that there may be existing conditions which could not be identified within the scope of work or which were not apparent at the time of our site work. This report is also limited to information available from the client at the time it was conducted. The report may not represent all conditions at the subject site as it only reflects the information gathered from specific locations.

It has been our pleasure to provide these services. If you have any questions or comments regarding this letter, please do not hesitate to contact us at (510) 434-9200.



Respectfully Submitted,

Jerald Cook, CIH, CSP, CAC, CDPH Lead I/A
Senior Industrial Hygienist

L. J. "Jerry" Stallworth
Principal Consultant

Attachments:

- Appendix A – Asbestos Sampling Laboratory Analytical Report and Chain of Custody Documentation
- Appendix B – Lead Bulk Sampling Laboratory Analytical Report and Chain of Custody Documentation
- Appendix C – Sample Location Diagram
- Appendix D – Personnel Certifications



APPENDIX A – ASBESTOS LABORATORY RESULTS AND CHAIN OF CUSTODY DOCUMENTATION



REPORT OF BULK SAMPLE ANALYSIS FOR ASBESTOS

TESTED FOR: PSI, Inc
4703 Tidewater Ave., Suite B
Oakland, CA 94601
Attn: L. Jerry Stallworth

Project ID: 05822033-1
405 Observatory Ave

Date Received: 3/1/2021

Date Completed: 3/4/2021

Date Reported: 3/4/2021


Analyst: Lori Huss Work Order: 2103038 Page: 1 of 1

Client ID	Lab ID (Layer)	Sample Description (Color, Texture, Etc.) <i>Analyst's Comment</i>	Asbestos Content (Percent and Type)	Non-asbestos Fibers (Percent and Type)
6-6-16	001A	(1) Gray, Concrete, Homogeneous	NO ASBESTOS DETECTED	None Reported
6-6-17	002A	(1) Gray, Concrete, Homogeneous	NO ASBESTOS DETECTED	None Reported
6-6-18	003A	(1) Gray, Concrete, Homogeneous	NO ASBESTOS DETECTED	None Reported
7-7-19	004A	(1) Black, Other, Homogeneous <i>Asphalt</i>	NO ASBESTOS DETECTED	None Reported
7-7-20	005A	(1) Black, Other, Homogeneous <i>Asphalt</i>	NO ASBESTOS DETECTED	None Reported
7-7-21	006A	(1) Black, Other, Homogeneous <i>Asphalt</i>	NO ASBESTOS DETECTED	None Reported
8-8-22	007A	(1) White, Plaster, Homogeneous (2) Gray, Plaster, Homogeneous	NO ASBESTOS DETECTED NO ASBESTOS DETECTED	None Reported 3% Cellulose Fiber
8-8-23	008A	(1) White, Plaster, Homogeneous (2) Gray, Plaster, Homogeneous	NO ASBESTOS DETECTED NO ASBESTOS DETECTED	None Reported 3% Cellulose Fiber
8-8-24	009A	(1) White, Plaster, Homogeneous (2) Gray, Plaster, Homogeneous	NO ASBESTOS DETECTED NO ASBESTOS DETECTED	None Reported 3% Cellulose Fiber

Report Notes: (PT) Point Count Results

Quantitation is based on a visual estimation of the relative area of bulk sample components, unless otherwise noted in the "Comments" section of this report. The results are valid only for the item tested as received. This report may not be used to claim product endorsement by NVLAP or any agency of the U.S. Government. Method used: E.P.A. Interim Method for the Determination of Asbestos in Bulk Insulation Samples (EPA 600/M4-82-020). Polarized Light Microscopy is not consistently reliable in detecting asbestos in floor coverings and similar non-friable organically bound materials. Quantitative Transmission Electron Microscopy is currently the only method that can be used to determine if the material can be considered or treated as non-asbestos containing. Samples will be disposed of within 30 days unless notified in writing by the client. No part of this report may be reproduced, except in full, without written permission of the laboratory. The reporting limit is 1% by weight. NVLAP Lab Code 101350-0.

Respectfully submitted,
PSI, Inc.


Approved Signatory
George Skarupa

Chain of Custody – Sample Location – Asbestos

Date: 2/24/21

Page 1 of 1

Project No.:

Field Inspector:

Relinquished by:
(Print)

Relinquished to:
(Print)

Client Name:

Building Name/No.:

Signature:
(Time and Date)

Signature:
(Time and Date)

405 observatory Ave

Antonio Navarro Padilla
Barry 31/02/2009

[illegible]

1st Positive Stop YES

Turnaround Time: 5 day

Results jerry.stallworth@intertek.com & emely.ganuza@intertek.com & megan.johnsonguthrie@intertek.com

Notes/Analysis: PLM

MICRO ANALYTICAL LABORATORIES, INC.

BULK ASBESTOS ANALYSIS - PLM ARB 435



1005

Jerry Stallworth
Professional Service Industries
4703 Tidewater Avenue, Suite B
Oakland, CA 94601

PROJECT:

PROJECT NO. 05822033
MENDOCINO COUNTY
UKIAH, CA

Micro Log. In **278962**Total Samples **2**Date Sampled **02/24/2021**Date Received **02/25/2021**Date Analyzed **02/28/2021**

SAMPLE INFORMATION		ASBESTOS INFORMATION	DOMINANT OTHER MATERIALS
QUANTITY (AREA %) / TYPES / LAYERS / DISTINCT SAMPLES			
Client #: 1		ND	
Micro #: 278962-01 Analyst: BK FRONT YARD BARE SOIL 586 LOW GAP - YARD			Matrix: ROCK FRAGMENTS Type: SOIL
Asb. / Total Pts. Matrix Removed Sensitivity 0 / 400 0% 0.250%			
Client #: 2		ND	
Micro #: 278962-02 Analyst: BK VEG. GARDEN - DRIVE WAY BARE SOIL 405 OBSERVATION AVE			Matrix: ROCK FRAGMENTS Type: SOIL
Asb. / Total Pts. Matrix Removed Sensitivity 0 / 400 0% 0.250%			

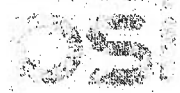
Technical Supervisor: 

Baojia Ke, Ph.D.

2/28/2021

Date Reported

Analyses use Polarized Light Microscopy (PLM), Micro Analytical SOP PLM-101 for building materials. Basic techniques follow EPA – Appendix E to Subpart E of 40 CFR Part 763; Interim Method for the Determination of Asbestos in Bulk Insulation Samples" (originally published 1982), EPA-600/R93-116 (1993), and California ARB 435 (1991) for applicable soil, rock, or aggregate samples. NOTES: Weight % cannot be determined by PLM estimation or point counts. Asbestos fibers with diameter below ~1 µm may not be detected by PLM. The absence of asbestos in dust or debris (including wipe or microvacuum), and in some compact materials, including floor tiles, cannot be conclusively established by PLM, and should be confirmed by Transmission Electron Microscopy (TEM). Only dominant non-asbestos materials are indicated. This report must not be interpreted as a conclusive identification of non-asbestos (fibrous or not). Quantities of non-asbestos fibers are estimated, not point counted. Preparation (all samples): grinding, milling; teasing bundles apart; drying, if needed, by hotplate. Acid dissolution, ashing, or other matrix reduction techniques may be applied to some samples; residue asbestos % is corrected for amount of matrix removed. Various sample interferences may prevent detection of small asbestos fibers, and hinder determination of some optical properties. Notes are made if point counting is used; otherwise, asbestos is quantified by calibrated visual estimation. Detection limit is material dependent. Detection of asbestos traces (<<1%) may not be reliable or reproducible by PLM. Lower quantitation limit (reporting limit) of PLM estimation is 1%. The Cal-OSHA definition of asbestos-containing construction material is 0.1% asbestos by weight; however, reliable determination of asbestos weight percent at this level cannot be done by PLM, and TEM is recommended. Sample heterogeneity is indicated by listing more than one distinct layer or material on the report. Composite asbestos percentages on multilayered samples are applicable only to layered wall systems (wallboard, joint compound, and related materials); compositing is based on clients' descriptions of a material as "joint compound". Clients are solely responsible for identification and description of bulk materials listed on field forms. Laboratory sample descriptions may differ from descriptions given by the client. Quality Control (QC): all results have been determined to be within acceptance limits prior to reporting. Samples that were reanalyzed are denoted by two sets of analyst initials. Unless otherwise stated in this report, all samples were received in acceptable condition for analysis. This report must not be used to claim product endorsement by NIST or any U.S. Government agency. This report shall not be reproduced except in full, without the approval of Micro Analytical Laboratories, Inc., and pertains only to the samples analyzed as received. ND = NO ASBESTOS DETECTED.



To Be Used For All Types Of Analysis

Required Turn-Around Time

4 Hour _____
8 Hour _____
24 Hour _____
48 Hour _____
72 Hour _____

5 day

278962

[illegible]

2.25.2
9:45 AM



APPENDIX B – LEAD LABORATORY RESULTS AND CHAIN OF CUSTODY DOCUMENTATION



Analytical Report
Analysis of Paint for Lead Determination

TESTED FOR: PSI, Inc
4703 Tidewater Ave., Suite B
Oakland, CA 94601
Attn: L. Jerry Stallworth

Project ID: 05822033
405 Observatory Ave.

Date Received: 3/1/2021 **Date Analyzed:** 3/3/2021 **Date of Issue:** 3/3/2021

Analyst: Keith Potts **Work Order:** 2103055 **Page:** 1 of 1

Lab Sample #	Client Sample #	% Lead by Weight	Reporting Limit % Lead by Weight
001A	PB-01	0.31	0.019
002A	PB-02	0.86	0.022

Analytical & Prep Method PSI WI-506 mod. EPA SW846 7000B, Rev 2, 2007
PSI WI-502 mod. EPA SW846 3050B, Rev 2, 1996
Analysis was performed by flame AA using a PE AAnalyst 400.

Reporting limit = 15µg Pb per representative subsample.

Results are based on a representative subsample of the total sample submitted by the client.

AIHA-LAP, LLC #100373; NYELAP ID #10930; CA Lab ID #2377.

Unless otherwise noted, all samples were acceptable upon receipt.

Sample results are not corrected for blanks.

All quality control sample results are within the acceptance range, unless noted.

All results are calculated based on 2 significant figures. Results relate only to items tested as received.

Client submitted data is the determining factor in the accuracy of calculated results.

The attached Chain of Custody is incorporated into and becomes a part of the final report.

This report may not be reproduced, except in full, without written approval of PSI, Inc.

Respectfully submitted,
PSI, Inc.

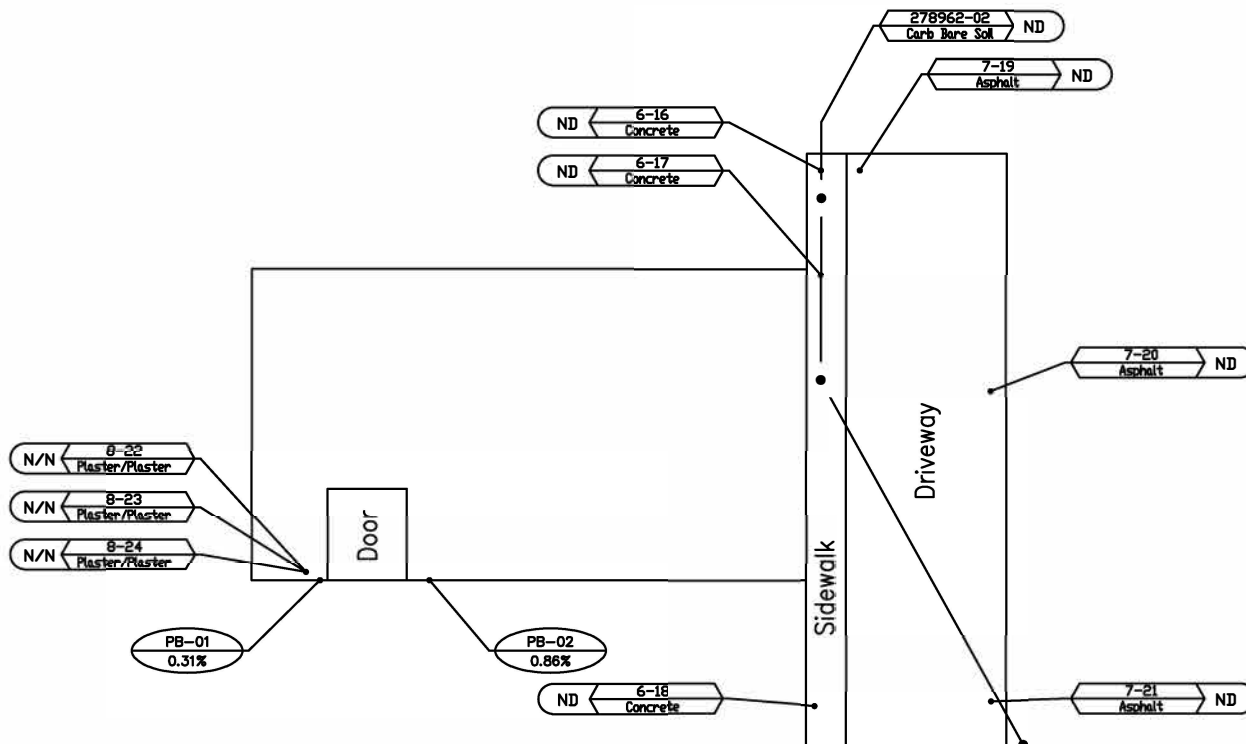
Approved Signatory
Richard Cornelius



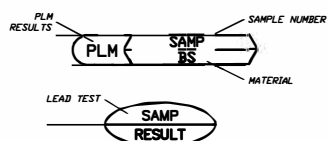
Turnaround Time: **5 day**
Results: jerry.stallworth@intertek.com &
emely.ganaza@intertek.com &
megan.johnsonguthrie@intertek.com
Notes/Analysis: FAA



APPENDIX C – SAMPLE LOCATIONS



SAMPLE LEGEND:



P or POS = Positive
 N, ND or NEG = None Detected
 NA = Not Analyzed
 Lead results expressed by weight

intertek psi Total Quality. Assured.		4703 Tidewater Avenue, Suite B Oakland, California 94601 (510) 434-9200		
Project Name: Veterans Services ADA Project 405 Observatory Avenue, Ukiah, CA		Drawn By: M.G.	Date: 3/5/21	File No.: 2033-001
Title: HAZARDOUS MATERIALS SURVEY SAMPLE LOCATIONS		Approved By: L.J.S.	Project No.: 05822033	
				Figure No.: 2



APPENDIX D – PERSONNEL CERTIFICATIONS

DEPARTMENT OF INDUSTRIAL RELATIONS
Division of Occupational Safety and Health
Asbestos Certification & Training Unit

2424 Arden Way, Suite 495

Sacramento, CA 95825-2417

(916) 574-2993 Office <http://www.dir.ca.gov/dosh/asbestos.html> acru@dir.ca.gov

103202923C

220

March 23, 2020

Jerald S Cook
1215 Rolling Hills Ct
Livermore CA 94551

Dear Certified Asbestos Consultant or Technician:

Enclosed is your certification card. **To maintain your certification, you must abide by the rules printed on the back of the certification card.**

Your certification is valid for a period of one year. If you wish to renew your certification, you must apply for renewal at least 60 days before the expiration date shown on your card. [8 CCR 341.15(h)(1)].

Please hold and do not send copies of your required AHERA refresher renewal certificates to our office until you apply for renewal of your certification.

Certificates must be kept current if you are actively working as a CAC or CSST. The grace period is only for those who are not actively working as an asbestos consultant or site surveillance technician.

Please notify our office via U.S. Postal Service or other carrier of any changes in your mailing or work address within 15 days of the change.

Sincerely,

Jeff Ferrell
Senior Safety Engineer

Attachment: Certification Card

cc: File

Renewal - Card Attached 08/2019





STATE OF CALIFORNIA
DEPARTMENT OF PUBLIC HEALTH



LEAD-RELATED CONSTRUCTION CERTIFICATE

INDIVIDUAL:

CERTIFICATE TYPE:

NUMBER:

EXPIRATION DATE:

Lead Inspector/Assessor

LRC-00002353

9/7/2021

Jerald Cook

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 or calling (800) 597-LEAD.

M & C Environmental Training

Asbestos Inspector Refresher Training Course

Antonio Navarro

Has successfully completed the Asbestos Inspector Refresher course approved by the California Division of Occupational Safety and Health for purposes of certification required by Title 8, Article 2.7, Chapter 3.2, Section 341.16 and the accreditation required under the Toxic Substances Control Act, Title II. Conducted by M&C Environmental Training Inc., 1619 Beverly Place, Berkeley, California. Tel. # (510) 525 – 1388

Course Approval Number: CA-003-06

Location: Berkeley, California

Expiration: May 28, 2021

Dates: May 28, 2020

Director of Training: John McGinnis



Certificate Number **47575 IR**



STATE OF CALIFORNIA
DEPARTMENT OF PUBLIC HEALTH



LEAD-RELATED CONSTRUCTION CERTIFICATE

INDIVIDUAL:



Antonio Navarro Padilla

CERTIFICATE TYPE:

Lead Sampling Technician

NUMBER:

LRC-00006022

EXPIRATION DATE:

3/16/2021

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 or calling (800) 597-LEAD.