



## **PLM<sup>1</sup> Suspect Asbestos Bulk Sample Results**

**To: City of Fort Bragg**  
Attn: Sandy Arellano  
416 N Franklin Street  
Fort Bragg, CA 95437

**September 30, 2021**

**From: Air Environmental**  
PO Box 294  
Santa Rosa, CA 95402

**RE: PLM<sup>1</sup> Suspect Asbestos Bulk Sampling: (demolition work/ house)**

**350 Cypress St. / Fort Bragg, CA 95437**

Per your request, on September 28th, 2021, Joshua Leard, of Air Environmental, Certified Site Surveillance Technician (CSST) CA DOSH #18-6262, performed suspect asbestos bulk sampling at the above referenced location. The purpose of this sample collection was to ascertain the presence or absence of asbestos in the suspect, Presumed asbestos-containing materials (PACM) / Asbestos Containing Building Materials (ACBMs), (drywall system, sheet vinyl and mastic, window glazing, fiber board, roofing and felt, and cement foundation), that will be disturbed during the demolition work activities.

This sample collection does not include any other areas and/or materials other than the areas and materials listed in this report, (see attached chain of custody forms and sampling area plan for listed sample locations).

During the course of the sample collection a total of, twenty nine (29) samples were collected with the subsequent analysis of forty five (45) discrete samples. The samples collected were catalogued on site and then delivered, Via FedEx, to Environmental Testing Laboratories in Romulus, Michigan for analysis by Polarized Light Microscopy (PLM<sup>1</sup>). The subsequent analysis of the samples showed asbestos present in sample numbers, listed below:

| Sample Number | Description  | Content Asbestos |
|---------------|--------------|------------------|
| B-1 Layer-2   | Texture      | 0.25% Chrysotile |
| B-2 Layer-2   | Texture      | 0.25% Chrysotile |
| B-3 Layer-2   | Texture      | 0.5% Chrysotile  |
| B-4 Layer-2   | Texture      | 1% Chrysotile    |
| B-5 Layer-2   | Texture      | 1.75% Chrysotile |
| B-9           | Window Glaze | 2% Chrysotile    |

**See Attached Laboratory Report Number 242686**

Note: actual square footage of materials shall be determined by contractor

This sample collection and report shall not be interpreted or used as a complete asbestos survey for any other purpose other than that referenced above. A homogeneous area shall be determined to contain asbestos based on a finding that the results of at least one sample collected from that area shows that asbestos is present.

The ACBMs identified and collected in this report does not identify any other suspect materials that may be present in the area, hidden in walls, above ceilings or floors covered with multiple layers of flooring materials. In the event that any other suspect materials are discovered during the work activities, all work must stop until the suspect materials, ACBMs, are collected and analyzed.

**Asbestos**

The *Code of Federal Regulations (CFR)*, 40 CFR 61, Subpart M, National Emissions Standards for Hazardous Air Pollutants (NESHAP) and Federal Occupational Safety and Health Administration (FED OSHA) classify asbestos-containing material (ACM) as any material or product that contains *greater than* 1% asbestos. Nonfriable ACM is classified by NESHAP as either Category I or Category II material defined as follows:

- **Category I** – asbestos-containing packings, gaskets, resilient floor coverings, and asphalt roofing products.
- **Category II** – all remaining types of nonfriable asbestos-containing material not included in Category I that when dry, cannot be crumbled, pulverized, or reduced to powder by hand pressure.

Regulated asbestos-containing material (RACM), a hazardous waste, is classified as any manufactured material that contains ***greater than*** 1% asbestos by dry weight *and* is:

- Friable (can be crumbled, pulverized, or reduced to powder by hand pressure); or
- Category I material that has become friable; or

- Category I material that has been subjected to sanding grinding, cutting or abrading; or
- Category II non-friable material that has a high probability of becoming crumbled, pulverized, or reduced to a powder during demolition or renovation activities.

Activities that disturb materials containing asbestos are subject to certain requirements of the Cal/OSHA asbestos standard contained in Title 8, CCR Section 1529. Typically, removal or disturbance of more than 100 square feet of material containing more than 0.1% asbestos must be performed by a, DOSH registered asbestos abatement contractor.

With respect to potential worker exposure, notification, and registration requirements, Cal/OSHA defines asbestos-containing construction material as construction material that contains more than 0.1% asbestos (Title 8, CCR 341.6).

The Department of Toxic Substances Control (DTSC) classifies asbestos-containing material as a hazardous waste if it is “friable” and contains one percent (1.0%) or more asbestos as hazardous waste. A friable waste is one that can be reduced to a powder or dust under hand pressure when dry. This classification standard is given in California Code of Regulations, section 66261.24. Because the United States Environmental Protection Agency (U.S.EPA) does not regulate asbestos as hazardous waste under the Resource Conservation and Recovery Act (RCRA), it is considered to be a “non-RCRA, or “California-only” hazardous waste.

More than 50 countries, including the United Kingdom, Australia and all 28 countries of the European Union, have banned the use of asbestos. Canada has pledged to ban the use of the toxic mineral by 2018.

But the U.S. continues to import and use asbestos with no plan for stricter regulations in place.

It may be shocking to many, especially if you’re among the majority of people who believe that asbestos was banned in the U.S. after warnings were issued in the 1970s. We now know for certain that all forms of asbestos can cause mesothelioma, lung cancer and other chronic respiratory conditions.

It wasn’t until the early 1970s that government agencies such as the Occupational Safety and Health Administration (OSHA) and the U.S. Environmental Protection Agency (EPA) were created to limit exposures to asbestos and other toxic pollutants. Although it is highly regulated in the U.S. today, asbestos continues to be used in hundreds of consumer products as long as it accounts for **less than one percent <1%** of the product.

Materials containing more than 1% asbestos are also subject to NESHAP regulations (40 CFR Part 61, Subpart M). RACM (friable ACM and nonfriable ACM that will

become friable during demolition operations) must be removed from structures prior to demolition. Certain non-friable ACM and materials containing 1% or less asbestos may remain in structures during demolition; however, there are waste handling/disposal issues and Cal/OSHA work requirements that may make it cost ineffective to do so. Contractors are responsible for segregating and characterizing waste streams prior to disposal.

On July 12, 1989, the EPA issued a final rule under Section 6 of the Toxic Substances Control Act (TSCA) banning most asbestos-containing products in the United States. In 1991, the rule was vacated and remanded by the Fifth Circuit Court of Appeals. As a result, most of the original ban on the manufacture, importation, processing, or distribution in commerce for most of the asbestos-containing product categories originally covered in the 1989 final rule was overturned. Only the bans on corrugated paper, roll-board, commercial paper, specialty paper, and flooring felt and any new uses of asbestos remained banned under the 1989 rule. Although most asbestos containing products can still legally be manufactured, imported, processed and distributed in the U.S., according to the U.S. Geological Survey, the production and use of asbestos has declined significantly.

There were previously no survey and testing requirements for concrete (with the exception of bridges and pools or other structures that have a higher likelihood of containing asbestos). Under SB 1374 California's Green Building Standards Code (CALGreen) requires the diversion of 50% of the waste generated from certain demolition projects. In addition, all California cities are required by state law (AB 939) to recycle a minimum of 50% of all municipal solid waste generated within the jurisdiction. Because workers and the public may be exposed to asbestos during the demolition and recycling process, it is important for concrete to also be surveyed and tested prior to its disturbance.

The US EPA has determined concrete is a suspect asbestos-containing building material and considers concrete to be a miscellaneous material and the Asbestos Hazard Emergency Response Act (AHERA) requires a sampling frequency of "sufficient to determine" for miscellaneous materials. This concrete sampling requirement and the proper removal of asbestos-containing concrete will prevent the reintroduction of asbestos, both into the air when concrete is disturbed or crushed and when it is incorporated into new concrete products after recycling.



Earl "Duke" Wildhaber  
Certified Asbestos Consultant  
CA DOSH #03-3283

<sup>1</sup> (PLM) Polarized Light Microscopy EPA Method 600/R-93-116  
<sup>2</sup> (NESHAP) National Emission Standards for Hazardous Air Pollutants



To: Air Environmental  
PO Box 294  
Santa Rosa, California 95402

ETL Job: 242686

Client Project: N/A

Report Date: 9/30/2021

Attention: Josh Leard

Project Location: 350 Cypress St Fort Bragg CA 95437  
House

| Lab Sample Number | Client Sample Number | Sample Type | Completed  |
|-------------------|----------------------|-------------|------------|
| 1249412           | B-1                  | Asbestos    | 09/30/2021 |
| 1249413           | B-2                  | Asbestos    | 09/30/2021 |
| 1249414           | B-3                  | Asbestos    | 09/30/2021 |
| 1249415           | B-4                  | Asbestos    | 09/30/2021 |
| 1249416           | B-5                  | Asbestos    | 09/30/2021 |
| 1249417           | B-6                  | Asbestos    | 09/30/2021 |
| 1249418           | B-7                  | Asbestos    | 09/30/2021 |
| 1249419           | B-8                  | Asbestos    | 09/30/2021 |
| 1249420           | B-9                  | Asbestos    | 09/30/2021 |
| 1249421           | B-10                 | Asbestos    | 09/30/2021 |
| 1249422           | B-11                 | Asbestos    | 09/30/2021 |
| 1249423           | B-12                 | Asbestos    | 09/30/2021 |
| 1249424           | B-13                 | Asbestos    | 09/30/2021 |
| 1249425           | B-14                 | Asbestos    | 09/30/2021 |
| 1249426           | B-15                 | Asbestos    | 09/30/2021 |
| 1249427           | B-16                 | Asbestos    | 09/30/2021 |
| 1249428           | B-17                 | Asbestos    | 09/30/2021 |

| Lab Sample Number | Client Sample Number | Sample Type | Completed  |
|-------------------|----------------------|-------------|------------|
| 1249429           | B-18                 | Asbestos    | 09/30/2021 |
| 1249430           | B-19                 | Asbestos    | 09/30/2021 |
| 1249431           | B-20                 | Asbestos    | 09/30/2021 |
| 1249432           | B-21                 | Asbestos    | 09/30/2021 |
| 1249433           | B-22                 | Asbestos    | 09/30/2021 |
| 1249434           | B-23                 | Asbestos    | 09/30/2021 |
| 1249435           | B-24                 | Asbestos    | 09/30/2021 |
| 1249436           | B-25                 | Asbestos    | 09/30/2021 |
| 1249437           | B-26                 | Asbestos    | 09/30/2021 |
| 1249438           | B-27                 | Asbestos    | 09/30/2021 |
| 1249439           | B-28                 | Asbestos    | 09/30/2021 |
| 1249440           | B-29                 | Asbestos    | 09/30/2021 |

Reviewed by:



Emily Nowacki

## Polarized Light Microscopy Asbestos Analysis Report

**To :** Air Environmental  
 PO Box 294  
 Santa Rosa, California 95402

**ETC Job :** 242686  
**Client Project :** N/A  
**Date Collected :** 09/28/2021  
**Date Received :** 09/29/2021

**Location :** House  
 350 Cypress St Fort Bragg CA 95437

| Sample   | Description | Appearance                         | % Fibrous        | % Non-Fibrous                    | % Asbestos                                  |
|--|-------------|------------------------------------|------------------|----------------------------------|---|
| 1249412<br>B-1<br>Entry<br>Layer-1 Analyst: Dawson Bradley<br>Date Analyzed : 09/30/2021   | Drywall     | White<br>Non-Fibrous<br>Homogenous | PLM 3% Cellulose | PLM 97% Other                    | PLM None Detected                           |
| 1249412<br>B-1<br>Entry<br>Layer-2 Analyst: Dawson Bradley<br>Date Analyzed : 09/30/2021   | Texture     | White<br>Non-Fibrous<br>Homogenous | PLM 3% Cellulose | PLM 97% Other<br>PC 99.75% Other | PLM Trace Chrysotile<br>PC 0.25% Chrysotile |
| 1249413<br>B-2<br>Office<br>Layer-1 Analyst: Dawson Bradley<br>Date Analyzed : 09/30/2021  | Drywall     | White<br>Non-Fibrous<br>Homogenous | PLM 3% Cellulose | PLM 97% Other                    | PLM None Detected                           |
| 1249413<br>B-2<br>Office<br>Layer-2 Analyst: Dawson Bradley<br>Date Analyzed : 09/30/2021  | Texture     | White<br>Non-Fibrous<br>Homogenous | PLM 3% Cellulose | PLM 97% Other<br>PC 99.75% Other | PLM Trace Chrysotile<br>PC 0.25% Chrysotile |
| 1249414<br>B-3<br>Kitchen<br>Layer-1 Analyst: Dawson Bradley<br>Date Analyzed : 09/30/2021 | Drywall     | White<br>Non-Fibrous<br>Homogenous | PLM 3% Cellulose | PLM 97% Other                    | PLM None Detected                           |
| 1249414<br>B-3<br>Kitchen<br>Layer-2 Analyst: Dawson Bradley<br>Date Analyzed : 09/30/2021 | Texture     | White<br>Non-Fibrous<br>Homogenous | PLM 3% Cellulose | PLM 97% Other<br>PC 99.5% Other  | PLM Trace Chrysotile<br>PC 0.5% Chrysotile  |

ETL, Inc. maintains liability limited to cost of analysis. This report relates only to the samples reported and may not be reproduced without written approval by ETL, Inc. Test Method EPA 600/R-93-116 & EPA 600/M4-82/020 or NYSDOH-ELAP item 198.1 and/or 198.6 was used to analyze all samples. Matrix interference and/or resolution limits (i.e. detecting asbestos in non-friable organically bound materials) may yield false results in certain circumstances. Quantitative transmission electron microscopy (TEM) is currently the only method that can pronounce materials as non-asbestos containing. Interpretation and use of test results are the responsibility of the client. ETL, Inc. is not responsible for the accuracy of the results when requested to physically separate and analyze layered samples. Any PLM results below 10% should be re-analyzed using the EPA recommended Point Count method. Any material that has greater than 1% asbestos content is considered to be an Asbestos Containing Material (ACM). These materials are regulated by both OSHA and the EPA and must be treated accordingly. Results are related to only to samples that were tested. An estimate of uncertainty can be provided at the client's request.



## Polarized Light Microscopy Asbestos Analysis Report

**To :** Air Environmental  
 PO Box 294  
 Santa Rosa, California 95402

**ETC Job :** 242686  
**Client Project :** N/A  
**Date Collected :** 09/28/2021  
**Date Received :** 09/29/2021

**Location :** House  
 350 Cypress St Fort Bragg CA 95437

| Sample   | Description | Appearance                          | % Fibrous        | % Non-Fibrous                    | % Asbestos                                  |
|--|-------------|-------------------------------------|------------------|----------------------------------|---|
| 1249415<br>B-4<br>Kitchen<br>Layer-1 Analyst: Dawson Bradley<br>Date Analyzed : 09/30/2021 | Drywall     | White<br>Non-Fibrous<br>Homogenous  | PLM 3% Cellulose | PLM 97% Other                    | PLM None Detected                           |
| 1249415<br>B-4<br>Kitchen<br>Layer-2 Analyst: Dawson Bradley<br>Date Analyzed : 09/30/2021 | Texture     | White<br>Non-Fibrous<br>Homogenous  | PLM 3% Cellulose | PLM 97% Other<br>PC 99% Other    | PLM Trace Chrysotile<br>PC 1% Chrysotile    |
| 1249416<br>B-5<br>Stairs<br>Layer-1 Analyst: Dawson Bradley<br>Date Analyzed : 09/30/2021  | Drywall     | White<br>Non-Fibrous<br>Homogenous  | PLM 3% Cellulose | PLM 97% Other                    | PLM None Detected                           |
| 1249416<br>B-5<br>Stairs<br>Layer-2 Analyst: Dawson Bradley<br>Date Analyzed : 09/30/2021  | Texture     | White<br>Non-Fibrous<br>Homogenous  | PLM 3% Cellulose | PLM 97% Other<br>PC 98.25% Other | PLM Trace Chrysotile<br>PC 1.75% Chrysotile |
| 1249417<br>B-6<br>Kitchen<br>Layer-1 Analyst: Dawson Bradley<br>Date Analyzed : 09/30/2021 | Sheet Vinyl | Gray<br>Non-Fibrous<br>Homogenous   | PLM 7% Cellulose | PLM 90% Other                    | PLM 3% Chrysotile                           |
| 1249417<br>B-6<br>Kitchen<br>Layer-2 Analyst: Dawson Bradley<br>Date Analyzed : 09/30/2021 | Mastic      | Yellow<br>Non-Fibrous<br>Homogenous | PLM 3% Cellulose | PLM 97% Other                    | PLM None Detected                           |

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# Certificate of Analysis

Environmental Testing Laboratories, Inc.  
 37575 W Huron River Drive  
 Romulus, Michigan 48174  
 (734) 955-6600, Fax: (734) 955-6604

## Polarized Light Microscopy Asbestos Analysis Report

To : Air Environmental  
 PO Box 294  
 Santa Rosa, California 95402

ETC Job : 242686  
 Client Project : N/A  
 Date Collected : 09/28/2021  
 Date Received : 09/29/2021

Location : House  
 350 Cypress St Fort Bragg CA 95437

| Sample  | Description  | Appearance                          | % Fibrous        | % Non-Fibrous | % Asbestos        |
|---|--------------|-------------------------------------|------------------|---------------|-------------------|
| 1249418<br>B-7<br>Bathroom 1<br>Layer-1 Analyst: Dawson Bradley<br>Date Analyzed : 09/30/2021<br><br>Layer Not Analyzed |              | Positive Stop                       |                  |               |                   |
| 1249418<br>B-7<br>Bathroom 1<br>Layer-2 Analyst: Dawson Bradley<br>Date Analyzed : 09/30/2021                           | Mastic       | Yellow<br>Non-Fibrous<br>Homogenous | PLM 3% Cellulose | PLM 97% Other | PLM None Detected |
| 1249419<br>B-8<br>Bathroom 1<br>Layer-1 Analyst: Dawson Bradley<br>Date Analyzed : 09/30/2021<br><br>Layer Not Analyzed |              | Positive Stop                       |                  |               |                   |
| 1249419<br>B-8<br>Bathroom 1<br>Layer-2 Analyst: Dawson Bradley<br>Date Analyzed : 09/30/2021                           | Mastic       | Yellow<br>Non-Fibrous<br>Homogenous | PLM 3% Cellulose | PLM 97% Other | PLM None Detected |
| 1249420<br>B-9<br>Layer-1 Analyst: Dawson Bradley<br>Date Analyzed : 09/30/2021   | Window Glaze | Gray<br>Non-Fibrous<br>Homogenous   | PLM 3% Cellulose | PLM 95% Other | PLM 2% Chrysotile |
| 1249421<br>B-10<br>Analyst: Dawson Bradley<br>Date Analyzed : 09/30/2021<br><br>Sample Not Analyzed                     |              | Positive Stop                       |                  |               |                   |

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## Polarized Light Microscopy Asbestos Analysis Report

**To :** Air Environmental  
 PO Box 294  
 Santa Rosa, California 95402

**ETC Job :** 242686  
**Client Project :** N/A  
**Date Collected :** 09/28/2021  
**Date Received :** 09/29/2021

**Location :** House  
 350 Cypress St Fort Bragg CA 95437

| Sample  | Description | Appearance                         | % Fibrous         | % Non-Fibrous | % Asbestos        |
|---|-------------|------------------------------------|-------------------|---------------|-------------------|
| 1249422<br>B-11   |             | Positive Stop                      |                   |               |                   |
| Analyst: Dawson Bradley<br>Date Analyzed : 09/30/2021<br><br>Sample Not Analyzed          |             |                                    |                   |               |                   |
| 1249423<br>B-12   | Fiber Board | Brown<br>Fibrous<br>Homogenous     | PLM 99% Cellulose | PLM 1% Other  | PLM None Detected |
| Upstairs Bathroom<br>Layer-1 Analyst: Dawson Bradley<br>Date Analyzed : 09/30/2021        |             |                                    |                   |               |                   |
| 1249424<br>B-13   | Fiber Board | Brown<br>Fibrous<br>Homogenous     | PLM 99% Cellulose | PLM 1% Other  | PLM None Detected |
| Upstairs Office<br>Layer-1 Analyst: Dawson Bradley<br>Date Analyzed : 09/30/2021          |             |                                    |                   |               |                   |
| 1249425<br>B-14   | Fiber Board | Brown<br>Fibrous<br>Homogenous     | PLM 99% Cellulose | PLM 1% Other  | PLM None Detected |
| Upstairs Stairway<br>Layer-1 Analyst: Dawson Bradley<br>Date Analyzed : 09/30/2021        |             |                                    |                   |               |                   |
| 1249426<br>B-15   | Sheet Vinyl | Brown<br>Non-Fibrous<br>Homogenous | PLM 20% Cellulose | PLM 80% Other | PLM None Detected |
| Upstairs Stairway Closet<br>Layer-1 Analyst: Dawson Bradley<br>Date Analyzed : 09/30/2021 |             |                                    |                   |               |                   |
| 1249426<br>B-15   | Mastic      | Brown<br>Non-Fibrous<br>Homogenous | PLM 5% Cellulose  | PLM 95% Other | PLM None Detected |
| Upstairs Stairway Closet<br>Layer-2 Analyst: Dawson Bradley<br>Date Analyzed : 09/30/2021 |             |                                    |                   |               |                   |

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## Polarized Light Microscopy Asbestos Analysis Report

**To :** Air Environmental  
 PO Box 294  
 Santa Rosa, California 95402

**ETC Job :** 242686  
**Client Project :** N/A  
**Date Collected :** 09/28/2021  
**Date Received :** 09/29/2021

**Location :** House  
 350 Cypress St Fort Bragg CA 95437

| Sample   | Description | Appearance                         | % Fibrous         | % Non-Fibrous | % Asbestos        |
|--|-------------|------------------------------------|-------------------|---------------|-------------------|
| 1249427<br>B-16<br>Upstairs Stairway Closet<br>Layer-1 Analyst: Dawson Bradley<br>Date Analyzed : 09/30/2021 | Sheet Vinyl | Brown<br>Non-Fibrous<br>Homogenous | PLM 20% Cellulose | PLM 80% Other | PLM None Detected |
| 1249427<br>B-16<br>Upstairs Stairway Closet<br>Layer-2 Analyst: Dawson Bradley<br>Date Analyzed : 09/30/2021 | Mastic      | Brown<br>Non-Fibrous<br>Homogenous | PLM 5% Cellulose  | PLM 95% Other | PLM None Detected |
| 1249428<br>B-17<br>Upstairs Attic Space<br>Layer-1 Analyst: Dawson Bradley<br>Date Analyzed : 09/30/2021     | Sheet Vinyl | Brown<br>Non-Fibrous<br>Homogenous | PLM 20% Cellulose | PLM 80% Other | PLM None Detected |
| 1249428<br>B-17<br>Upstairs Attic Space<br>Layer-2 Analyst: Dawson Bradley<br>Date Analyzed : 09/30/2021     | Mastic      | Brown<br>Non-Fibrous<br>Homogenous | PLM 5% Cellulose  | PLM 95% Other | PLM None Detected |
| 1249429<br>B-18<br>Upstairs Bathroom<br>Layer-1 Analyst: Dawson Bradley<br>Date Analyzed : 09/30/2021        | Sheet Vinyl | Gray<br>Non-Fibrous<br>Homogenous  | PLM 25% Cellulose | PLM 75% Other | PLM None Detected |
| 1249429<br>B-18<br>Upstairs Bathroom<br>Layer-2 Analyst: Dawson Bradley<br>Date Analyzed : 09/30/2021        | Mastic      | White<br>Non-Fibrous<br>Homogenous | PLM 5% Cellulose  | PLM 95% Other | PLM None Detected |

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# Certificate of Analysis

Environmental Testing Laboratories, Inc.  
 37575 W Huron River Drive  
 Romulus, Michigan 48174  
 (734) 955-6600, Fax: (734) 955-6604

## Polarized Light Microscopy Asbestos Analysis Report

To : Air Environmental  
 PO Box 294  
 Santa Rosa, California 95402

ETC Job : 242686  
 Client Project : N/A  
 Date Collected : 09/28/2021  
 Date Received : 09/29/2021

Location : House  
 350 Cypress St Fort Bragg CA 95437

| Sample  | Description | Appearance                         | % Fibrous         | % Non-Fibrous | % Asbestos        |
|---|-------------|------------------------------------|-------------------|---------------|-------------------|
| 1249430<br>B-19<br>Upstairs Bathroom<br>Layer-1 Analyst: Dawson Bradley<br>Date Analyzed : 09/30/2021 | Sheet Vinyl | Gray<br>Non-Fibrous<br>Homogenous  | PLM 25% Cellulose | PLM 75% Other | PLM None Detected |
| 1249430<br>B-19<br>Upstairs Bathroom<br>Layer-2 Analyst: Dawson Bradley<br>Date Analyzed : 09/30/2021 | Mastic      | White<br>Non-Fibrous<br>Homogenous | PLM 5% Cellulose  | PLM 95% Other | PLM None Detected |
| 1249431<br>B-20<br>Upstairs Bathroom<br>Layer-1 Analyst: Dawson Bradley<br>Date Analyzed : 09/30/2021 | Sheet Vinyl | Gray<br>Non-Fibrous<br>Homogenous  | PLM 25% Cellulose | PLM 75% Other | PLM None Detected |
| 1249431<br>B-20<br>Upstairs Bathroom<br>Layer-2 Analyst: Dawson Bradley<br>Date Analyzed : 09/30/2021 | Mastic      | White<br>Non-Fibrous<br>Homogenous | PLM 5% Cellulose  | PLM 95% Other | PLM None Detected |
| 1249432<br>B-21<br>Layer-1 Analyst: Dawson Bradley<br>Date Analyzed : 09/30/2021                      | Roofing     | Gray<br>Non-Fibrous<br>Homogenous  | PLM 5% Cellulose  | PLM 95% Other | PLM None Detected |
| 1249432<br>B-21<br>Layer-2 Analyst: Dawson Bradley<br>Date Analyzed : 09/30/2021                      | Felt        | Black<br>Fibrous<br>Homogenous     | PLM 80% Cellulose | PLM 20% Other | PLM None Detected |

ETL, Inc. maintains liability limited to cost of analysis. This report relates only to the samples reported and may not be reproduced without written approval by ETL, Inc. Test Method EPA 600/R-93-116 & EPA 600/M4-82/020 or NYSDOH-ELAP item 198.1 and/or 198.6 was used to analyze all samples. Matrix interference and/or resolution limits (i.e. detecting asbestos in non-friable organically bound materials) may yield false results in certain circumstances. Quantitative transmission electron microscopy (TEM) is currently the only method that can pronounce materials as non-asbestos containing. Interpretation and use of test results are the responsibility of the client. ETL, Inc. is not responsible for the accuracy of the results when requested to physically separate and analyze layered samples. Any PLM results below 10% should be re-analyzed using the EPA recommended Point Count method. Any material that has greater than 1% asbestos content is considered to be an Asbestos Containing Material (ACM). These materials are regulated by both OSHA and the EPA and must be treated accordingly. Results are related to only to samples that were tested. An estimate of uncertainty can be provided at the client's request.

## Polarized Light Microscopy Asbestos Analysis Report

**To :** Air Environmental  
 PO Box 294  
 Santa Rosa, California 95402

**ETC Job :** 242686  
**Client Project :** N/A  
**Date Collected :** 09/28/2021  
**Date Received :** 09/29/2021

**Location :** House  
 350 Cypress St Fort Bragg CA 95437

| Sample  | Description | Appearance                         | % Fibrous         | % Non-Fibrous | % Asbestos        |
|---|-------------|------------------------------------|-------------------|---------------|-------------------|
| 1249433<br>B-22   | Roofing     | Gray<br>Non-Fibrous<br>Homogenous  | PLM 5% Cellulose  | PLM 95% Other | PLM None Detected |
| Layer-1 Analyst: Dawson Bradley<br>Date Analyzed : 09/30/2021 |             |                                    |                   |               |                   |
| 1249433<br>B-22   | Felt        | Black<br>Fibrous<br>Homogenous     | PLM 80% Cellulose | PLM 20% Other | PLM None Detected |
| Layer-2 Analyst: Dawson Bradley<br>Date Analyzed : 09/30/2021 |             |                                    |                   |               |                   |
| 1249434<br>B-23   | Roofing     | Gray<br>Non-Fibrous<br>Homogenous  | PLM 5% Cellulose  | PLM 95% Other | PLM None Detected |
| Layer-1 Analyst: Dawson Bradley<br>Date Analyzed : 09/30/2021 |             |                                    |                   |               |                   |
| 1249434<br>B-23   | Felt        | Black<br>Fibrous<br>Homogenous     | PLM 80% Cellulose | PLM 20% Other | PLM None Detected |
| Layer-2 Analyst: Dawson Bradley<br>Date Analyzed : 09/30/2021 |             |                                    |                   |               |                   |
| 1249435<br>B-24   | Flat Roof   | Black<br>Non-Fibrous<br>Homogenous | PLM 7% Cellulose  | PLM 93% Other | PLM None Detected |
| Layer-1 Analyst: Dawson Bradley<br>Date Analyzed : 09/30/2021 |             |                                    |                   |               |                   |
| 1249435<br>B-24   | Felt        | Black<br>Fibrous<br>Homogenous     | PLM 80% Cellulose | PLM 20% Other | PLM None Detected |
| Layer-2 Analyst: Dawson Bradley<br>Date Analyzed : 09/30/2021 |             |                                    |                   |               |                   |

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# Certificate of Analysis

Environmental Testing Laboratories, Inc.  
 37575 W Huron River Drive  
 Romulus, Michigan 48174  
 (734) 955-6600, Fax: (734) 955-6604

## Polarized Light Microscopy Asbestos Analysis Report

To : Air Environmental  
 PO Box 294  
 Santa Rosa, California 95402

ETC Job : 242686  
 Client Project : N/A  
 Date Collected : 09/28/2021  
 Date Received : 09/29/2021

Location : House  
 350 Cypress St Fort Bragg CA 95437

| Sample  | Description       | Appearance                         | % Fibrous         | % Non-Fibrous | % Asbestos        |
|---|-------------------|------------------------------------|-------------------|---------------|-------------------|
| 1249436<br>B-25   | Flat Roof         | Black<br>Non-Fibrous<br>Homogenous | PLM 7% Cellulose  | PLM 93% Other | PLM None Detected |
| Layer-1 Analyst: Dawson Bradley<br>Date Analyzed : 09/30/2021 |                   |                                    |                   |               |                   |
| 1249436<br>B-25   | Felt              | Black<br>Fibrous<br>Homogenous     | PLM 80% Cellulose | PLM 20% Other | PLM None Detected |
| Layer-2 Analyst: Dawson Bradley<br>Date Analyzed : 09/30/2021 |                   |                                    |                   |               |                   |
| 1249437<br>B-26   | Flat Roof         | Black<br>Non-Fibrous<br>Homogenous | PLM 7% Cellulose  | PLM 93% Other | PLM None Detected |
| Layer-1 Analyst: Dawson Bradley<br>Date Analyzed : 09/30/2021 |                   |                                    |                   |               |                   |
| 1249437<br>B-26   | Felt              | Black<br>Fibrous<br>Homogenous     | PLM 80% Cellulose | PLM 20% Other | PLM None Detected |
| Layer-2 Analyst: Dawson Bradley<br>Date Analyzed : 09/30/2021 |                   |                                    |                   |               |                   |
| 1249438<br>B-27   | Cement Foundation | Gray<br>Non-Fibrous<br>Homogenous  | PLM 1% Cellulose  | PLM 99% Other | PLM None Detected |
| Layer-1 Analyst: Dawson Bradley<br>Date Analyzed : 09/30/2021 |                   |                                    |                   |               |                   |
| 1249439<br>B-28   | Cement Foundation | Gray<br>Non-Fibrous<br>Homogenous  | PLM 1% Cellulose  | PLM 99% Other | PLM None Detected |
| Layer-1 Analyst: Dawson Bradley<br>Date Analyzed : 09/30/2021 |                   |                                    |                   |               |                   |

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## Polarized Light Microscopy Asbestos Analysis Report

**To :** Air Environmental  
 PO Box 294  
 Santa Rosa, California 95402

**ETC Job :** 242686  
**Client Project :** N/A  
**Date Collected :** 09/28/2021  
**Date Received :** 09/29/2021

**Location :** House  
 350 Cypress St Fort Bragg CA 95437

| Sample  | Description       | Appearance                        | % Fibrous        | % Non-Fibrous | % Asbestos        |
|---|-------------------|-----------------------------------|------------------|---------------|-------------------|
| 1249440<br>B-29   | Cement Foundation | Gray<br>Non-Fibrous<br>Homogenous | PLM 1% Cellulose | PLM 99% Other | PLM None Detected |
| Layer-1 Analyst: Dawson Bradley<br>Date Analyzed : 09/30/2021 |                   |                                   |                  |               |                   |



Lab Supervisor/Other Signatory

Analyst:



Dawson Bradley

400 Point Count Results by EPA 600/R-93/116 PLM (denoted by "PC")  
 Item 198.1: PLM Methods for Identifying and Quantitating Asbestos in Bulk Samples  
 Item 198.6: PLM Methods for Identifying and Quantitating Asbestos in Non-Friable Organically Bound Bulk Samples  
 EPA 600/R-93/116: Method for Determination of Asbestos in Bulk Building Materials  
 EPA 600/M4-82-020: Interim Method for Determination of Asbestos in Bulk Insulation Samples  
 A % Asbestos result of "Trace" indicates that the analyzed material was found to contain less than 1% asbestos and would not be considered an Asbestos Containing Material (ACM).

ETL, Inc. maintains liability limited to cost of analysis. This report relates only to the samples reported and may not be reproduced without written approval by ETL, Inc. Test Method EPA 600/R-93-116 & EPA 600/M4-82/020 or NYSDOH-ELAP item 198.1 and/or 198.6 was used to analyze all samples. Matrix interference and/or resolution limits (i.e. detecting asbestos in non-friable organically bound materials) may yield false results in certain circumstances. Quantitative transmission electron microscopy (TEM) is currently the only method that can pronounce materials as non-asbestos containing. Interpretation and use of test results are the responsibility of the client. ETL, Inc. is not responsible for the accuracy of the results when requested to physically separate and analyze layered samples. Any PLM results below 10% should be re-analyzed using the EPA recommended Point Count method. Any material that has greater than 1% asbestos content is considered to be an Asbestos Containing Material (ACM). These materials are regulated by both OSHA and the EPA and must be treated accordingly. Results are related to only to samples that were tested. An estimate of uncertainty can be provided at the client's request.



# Chain of Custody

**Air Environmental**  
 PO Box 294, Santa Rosa, Ca 95402  
 707-408-2080 - CaEnvironmental@gmail.com  
**LEGAL DOCUMENT - PLEASE PRINT LEGIBLY**

For Lab Use Only  
 Lab No. 242686  
 Accept  Reject

| Contact Information        |                                   | Project Information              |       |
|----------------------------|-----------------------------------|----------------------------------|-------|
| Company: Air Environmental | Phone: 707-408-2080               | Project Name:                    |       |
| Contact: Josh Leard        | Cell Phone:                       | Project Location: 350 Cypress St |       |
| Account #:                 | E-mail: CaEnvironmental@gmail.com | House                            |       |
| SAMPLED BY: Name: JL       | Date: 9-28-21                     | Fort Bragg, Ca                   | 95437 |

|                                      |                        |              |                                   |                        |
|--------------------------------------|------------------------|--------------|-----------------------------------|------------------------|
| RELINQUISHED BY<br><i>Josh Leard</i> | DATE & TIME<br>9-28-21 | VIA<br>FedEx | RECEIVED BY<br><i>[Signature]</i> | DATE & TIME<br>9-29-21 |
| <i>Shirley [Signature]</i>           | 4pm                    |              |                                   | 11:55                  |

REQUESTED SERVICES (Please  the Appropriate Boxes)

|   |  |  |   |
|---|--|--|---|
| <input checked="" type="checkbox"/> PLM<br>Sulk Analysis (EPA 600/R-93/116) | <input type="checkbox"/> PCM<br>NIOSH 7400 | <input type="checkbox"/> TEM<br>Air - NIOSH 7402 | <input type="checkbox"/> Soot<br>Tape Lift Analysis |
| <input type="checkbox"/> 400 Point Count                                    |  |  |   |

TURNAROUND TIME

Rush

Same Day

24 - Hour

3 - Day

5 - Day

| No. | Sample ID | <input checked="" type="checkbox"/> To Be Analyzed | Lab ID   | Description           | Volume      | <input checked="" type="checkbox"/> Stop @ 1st Pos | Comments / Notes |
|-----|-----------|--|----------|-----------------------|-------------|--|------------------|
| 1   | B-1       | <input checked="" type="checkbox"/>                | 1249 412 | Entry Drywall texture |             | <input checked="" type="checkbox"/>                | <10% paint       |
| 2   | B-2       | <input type="checkbox"/>                           | 413      | Office                |             | <input type="checkbox"/>                           | "                |
| 3   | B-3       | <input type="checkbox"/>                           | 414      | Kitchen               |             | <input type="checkbox"/>                           | "                |
| 4   | B-4       | <input type="checkbox"/>                           | 415      | "                     |             | <input type="checkbox"/>                           | "                |
| 5   | B-5       | <input type="checkbox"/>                           | 416      | Stairs                |             | <input type="checkbox"/>                           | "                |
| 6   | B-6       | <input type="checkbox"/>                           | 417      | Kitchen               | Sheet vinyl | <input checked="" type="checkbox"/>                |                  |
| 7   | B-7       | <input type="checkbox"/>                           | 418      | Bathroom              | "           | <input type="checkbox"/>                           |                  |
| 8   | B-8       | <input type="checkbox"/>                           | 419      | "                     | "           | <input checked="" type="checkbox"/>                |                  |
| 9   | B-9       | <input type="checkbox"/>                           | 420      | Window Glaze          |             | <input checked="" type="checkbox"/>                |                  |
| 10  | B-10      | <input checked="" type="checkbox"/>                | 421      | "                     |             | <input checked="" type="checkbox"/>                |                  |

*9/30/21*

# Chain of Custody

Air Environmental  
 P.O. Box 294, Santa Rosa, Ca 95402  
 707-408-2080

## Legal Document

For Lab Use Only

Lab No. 292696

Accept  Reject

### Project Information

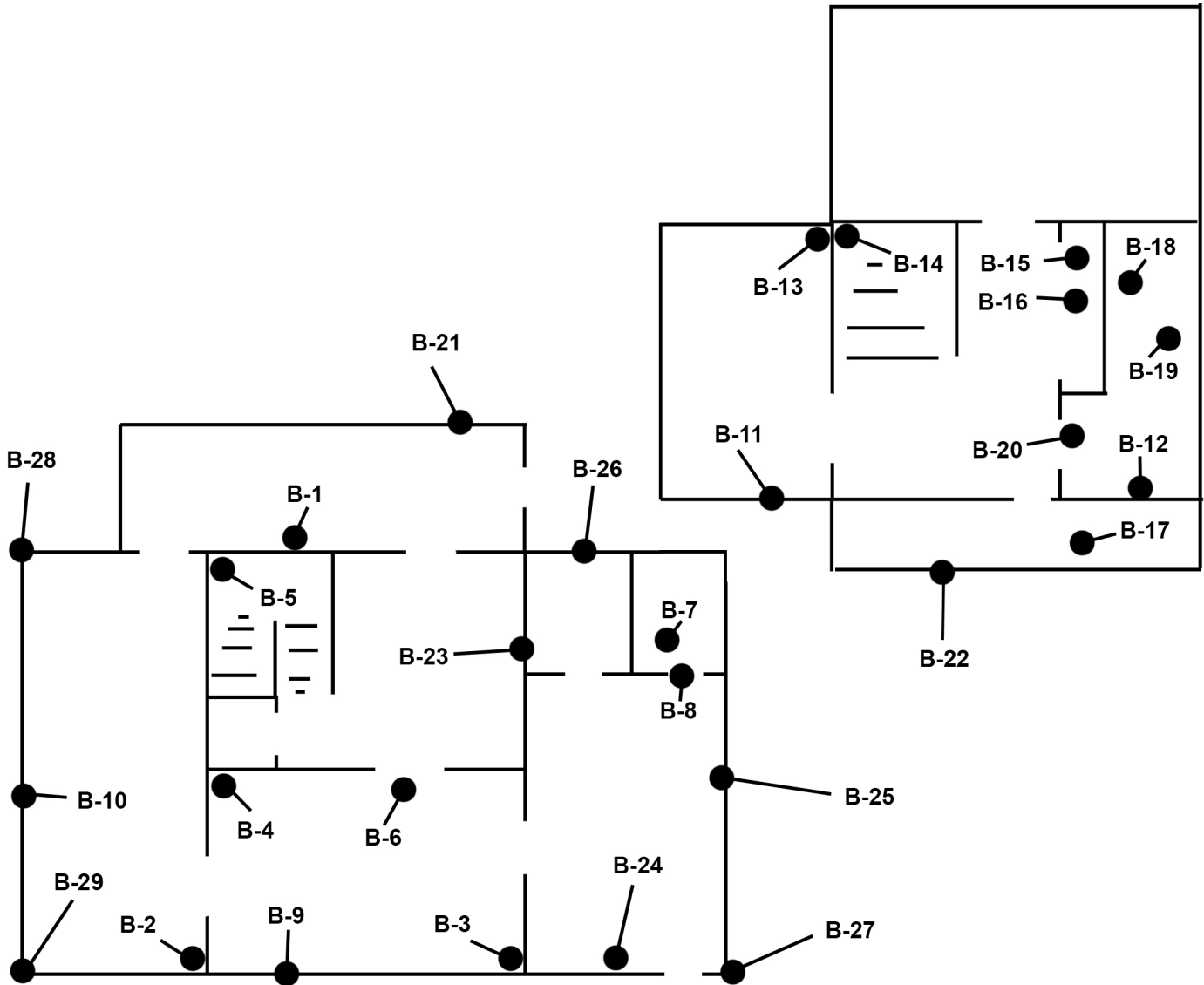
Company: Air Environmental

Project Name:

Project Location:

350 Cypress St House

| No. | Sample ID | <input checked="" type="checkbox"/> To Be Analyzed | Lab ID   | Description       | Volume / Area                         | Stop @ 1st Pos <input checked="" type="checkbox"/> | Comments / Notes |
|-----|-----------|--|----------|-------------------|---------------------------------------|--|------------------|
| 11  | B-11      | <input checked="" type="checkbox"/>                | 1249 422 | Window Glaze      |                                       | <input checked="" type="checkbox"/>                |                  |
| 12  | B-12      | <input type="checkbox"/>                           | 423      | Fiber board walls | Bathroom                              | <input checked="" type="checkbox"/>                |                  |
| 13  | B-13      | <input type="checkbox"/>                           | 424      | upstairs #1       | Office                                | <input type="checkbox"/>                           |                  |
| 14  | B-14      | <input type="checkbox"/>                           | 425      | "                 | Stairway                              | <input checked="" type="checkbox"/>                |                  |
| 15  | B-15      | <input type="checkbox"/>                           | 426      | "                 | Stairway Closet Sheet vinyl & Plastic | <input checked="" type="checkbox"/>                |                  |
| 16  | B-16      | <input type="checkbox"/>                           | 427      | "                 | "                                     | <input type="checkbox"/>                           |                  |
| 17  | B-17      | <input type="checkbox"/>                           | 428      | "                 | Attic space                           | <input checked="" type="checkbox"/>                |                  |
| 18  | B-18      | <input type="checkbox"/>                           | 429      | "                 | Bathroom Sheet vinyl & Plastic        | <input checked="" type="checkbox"/>                |                  |
| 19  | B-19      | <input type="checkbox"/>                           | 430      | "                 | "                                     | <input type="checkbox"/>                           |                  |
| 20  | B-20      | <input type="checkbox"/>                           | 431      | "                 | "                                     | <input checked="" type="checkbox"/>                |                  |
| 21  | B-21      | <input type="checkbox"/>                           | 432      | "                 | Roofing & Felt                        | <input checked="" type="checkbox"/>                |                  |
| 22  | B-22      | <input type="checkbox"/>                           | 433      | "                 | "                                     | <input type="checkbox"/>                           |                  |
| 23  | B-23      | <input type="checkbox"/>                           | 434      | "                 | "                                     | <input checked="" type="checkbox"/>                |                  |
| 24  | B-24      | <input type="checkbox"/>                           | 435      | Flat Roof & Felt  |                                       | <input checked="" type="checkbox"/>                |                  |
| 25  | B-25      | <input type="checkbox"/>                           | 436      | "                 |                                       | <input type="checkbox"/>                           |                  |
| 26  | B-26      | <input type="checkbox"/>                           | 437      | "                 |                                       | <input checked="" type="checkbox"/>                |                  |
| 27  | B-27      | <input type="checkbox"/>                           | 438      | Cement Foundation |                                       | <input checked="" type="checkbox"/>                |                  |
| 28  | B-28      | <input type="checkbox"/>                           | 439      | "                 |                                       | <input type="checkbox"/>                           |                  |
| 29  | B-29      | <input checked="" type="checkbox"/>                | 440      | "                 |                                       | <input checked="" type="checkbox"/>                |                  |
| 30  |           | <input type="checkbox"/>                           |          |                   |                                       | <input type="checkbox"/>                           |                  |





## **PLM<sup>1</sup> Suspect Asbestos Bulk Sample Results**

**To: City of Fort Bragg**  
Attn: Sandy Arellano  
416 N Franklin Street  
Fort Bragg, CA 95437

**September 30, 2021**

**From: Air Environmental**  
PO Box 294  
Santa Rosa, CA 95402

**RE: PLM<sup>1</sup> Suspect Asbestos Bulk Sampling: (demolition work storage building)**

**350 Cypress St. / Fort Bragg, CA 95437**

Per your request, on September 28th, 2021, Joshua Leard, of Air Environmental, Certified Site Surveillance Technician (CSST) CA DOSH #18-6262, performed suspect asbestos bulk sampling at the above referenced location. The purpose of this sample collection was to ascertain the presence or absence of asbestos in the suspect, Presumed asbestos-containing materials (PACM) / Asbestos Containing Building Materials (ACBMs), (drywall system, roofing and felt, cement foundation, and cement slab), that will be disturbed during the demolition work activities.

This sample collection does not include any other areas and/or materials other than the areas and materials listed in this report, (see attached chain of custody forms and sampling area plan for listed sample locations).

During the course of the sample collection a total of, seventeen (17) samples were collected with the subsequent analysis of twenty eight (28) discrete samples. The samples collected were catalogued on site and then delivered, Via FedEx, to Environmental Testing Laboratories in Romulus, Michigan for analysis by Polarized Light Microscopy (PLM<sup>1</sup>). The subsequent analysis of the samples showed no asbestos present in the collected samples, (see attached laboratory report #242685).

This sample collection and report shall not be interpreted or used as a complete asbestos survey for any other purpose other than that referenced above. A homogeneous area shall be determined to contain asbestos based on a finding that the results of at least one sample collected from that area shows that asbestos is present.

The ACBMs identified and collected in this report does not identify any other suspect materials that may be present in the area, hidden in walls, above ceilings or floors covered with multiple layers of flooring materials. In the event that any other suspect materials are discovered during the work activities, all work must stop until the suspect materials, ACBMs, are collected and analyzed.

## **Asbestos**

The *Code of Federal Regulations (CFR)*, 40 CFR 61, Subpart M, National Emissions Standards for Hazardous Air Pollutants (NESHAP) and Federal Occupational Safety and Health Administration (FED OSHA) classify asbestos-containing material (ACM) as any material or product that contains *greater than* 1% asbestos. Nonfriable ACM is classified by NESHAP as either Category I or Category II material defined as follows:

- **Category I** – asbestos-containing packings, gaskets, resilient floor coverings, and asphalt roofing products.
- **Category II** – all remaining types of nonfriable asbestos-containing material not included in Category I that when dry, cannot be crumbled, pulverized, or reduced to powder by hand pressure.

Regulated asbestos-containing material (RACM), a hazardous waste, is classified as any manufactured material that contains *greater than* 1% asbestos by dry weight *and* is:

- Friable (can be crumbled, pulverized, or reduced to powder by hand pressure); or
- Category I material that has become friable; or
- Category I material that has been subjected to sanding grinding, cutting or abrading; or
- Category II non-friable material that has a high probability of becoming crumbled, pulverized, or reduced to a powder during demolition or renovation activities.

Activities that disturb materials containing asbestos are subject to certain requirements of the Cal/OSHA asbestos standard contained in Title 8, CCR Section 1529. Typically, removal or disturbance of more than 100 square feet of material containing more than 0.1% asbestos must be performed by a, DOSH registered asbestos abatement contractor.

With respect to potential worker exposure, notification, and registration requirements, Cal/OSHA defines asbestos-containing construction material as construction material that contains more than 0.1% asbestos (Title 8, CCR 341.6).

The Department of Toxic Substances Control (DTSC) classifies asbestos-containing material as a hazardous waste if it is “friable” and contains one percent (1.0%) or more asbestos as hazardous waste. A friable waste is one that can be reduced to a powder or dust under hand pressure when dry. This classification standard is given in California Code of Regulations, section 66261.24. Because the United States Environmental Protection Agency (U.S.EPA) does not regulate asbestos as hazardous waste under the Resource Conservation and Recovery Act (RCRA), it is considered to be a “non-RCRA, or “California-only” hazardous waste.

More than 50 countries, including the United Kingdom, Australia and all 28 countries of the European Union, have banned the use of asbestos. Canada has pledged to ban the use of the toxic mineral by 2018.

But the U.S. continues to import and use asbestos with no plan for stricter regulations in place.

It may be shocking to many, especially if you’re among the majority of people who believe that asbestos was banned in the U.S. after warnings were issued in the 1970s. We now know for certain that all forms of asbestos can cause mesothelioma, lung cancer and other chronic respiratory conditions.

It wasn’t until the early 1970s that government agencies such as the Occupational Safety and Health Administration (OSHA) and the U.S. Environmental Protection Agency (EPA) were created to limit exposures to asbestos and other toxic pollutants. Although it is highly regulated in the U.S. today, asbestos continues to be used in hundreds of consumer products as long as it accounts for **less than one percent <1%** of the product.

Materials containing more than 1% asbestos are also subject to NESHAP regulations (40 CFR Part 61, Subpart M). RACM (friable ACM and nonfriable ACM that will become friable during demolition operations) must be removed from structures prior to demolition. Certain non-friable ACM and materials containing 1% or less asbestos may remain in structures during demolition; however, there are waste handling/disposal issues and Cal/OSHA work requirements that may make it cost ineffective to do so. Contractors are responsible for segregating and characterizing waste streams prior to disposal.

On July 12, 1989, the EPA issued a final rule under Section 6 of the Toxic Substances Control Act (TSCA) banning most asbestos-containing products in the United States. In 1991, the rule was vacated and remanded by the Fifth Circuit Court of Appeals. As a result, most of the original ban on the manufacture, importation, processing, or distribution in commerce for most of the asbestos-containing product categories originally covered in the 1989 final rule was overturned. Only the bans on corrugated paper, roll-board, commercial paper, specialty paper, and flooring felt and any new uses of asbestos remained banned under the 1989 rule. Although most asbestos containing products can still legally be manufactured, imported, processed and distributed in the U.S., according to the U.S. Geological Survey, the production and use of asbestos has declined significantly.

There were previously no survey and testing requirements for concrete (with the exception of bridges and pools or other structures that have a higher likelihood of containing asbestos). Under SB 1374 California's Green Building Standards Code (CALGreen) requires the diversion of 50% of the waste generated from certain demolition projects. In addition, all California cities are required by state law (AB 939) to recycle a minimum of 50% of all municipal solid waste generated within the jurisdiction. Because workers and the public may be exposed to asbestos during the demolition and recycling process, it is important for concrete to also be surveyed and tested prior to its disturbance.

The US EPA has determined concrete is a suspect asbestos-containing building material and considers concrete to be a miscellaneous material and the Asbestos Hazard Emergency Response Act (AHERA) requires a sampling frequency of "sufficient to determine" for miscellaneous materials. This concrete sampling requirement and the proper removal of asbestos-containing concrete will prevent the reintroduction of asbestos, both into the air when concrete is disturbed or crushed and when it is incorporated into new concrete products after recycling.



Earl "Duke" Wildhaber  
Certified Asbestos Consultant  
CA DOSH #03-3283

<sup>1</sup> (PLM) Polarized Light Microscopy EPA Method 600/R-93-116

<sup>2</sup> (NESHAP) National Emission Standards for Hazardous Air Pollutants



To: Air Environmental  
PO Box 294  
Santa Rosa, California 95402

**ETL Job:** 242685  
**Client Project:** N/A  
**Report Date:** 9/30/2021

**Attention:** Josh Leard

**Project Location:** 350 Cypress St Fort Bragg CA 95437  
Storage

| Lab Sample Number | Client Sample Number | Sample Type | Completed  |
|-------------------|----------------------|-------------|------------|
| 1249395           | B-1                  | Asbestos    | 09/30/2021 |
| 1249396           | B-2                  | Asbestos    | 09/30/2021 |
| 1249397           | B-3                  | Asbestos    | 09/30/2021 |
| 1249398           | B-4                  | Asbestos    | 09/30/2021 |
| 1249399           | B-5                  | Asbestos    | 09/30/2021 |
| 1249400           | B-6                  | Asbestos    | 09/30/2021 |
| 1249401           | B-7                  | Asbestos    | 09/30/2021 |
| 1249402           | B-8                  | Asbestos    | 09/30/2021 |
| 1249403           | B-9                  | Asbestos    | 09/30/2021 |
| 1249404           | B-10                 | Asbestos    | 09/30/2021 |
| 1249405           | B-11                 | Asbestos    | 09/30/2021 |
| 1249406           | B-12                 | Asbestos    | 09/30/2021 |
| 1249407           | B-13                 | Asbestos    | 09/30/2021 |
| 1249408           | B-14                 | Asbestos    | 09/30/2021 |
| 1249409           | B-15                 | Asbestos    | 09/30/2021 |
| 1249410           | B-16                 | Asbestos    | 09/30/2021 |
| 1249411           | B-17                 | Asbestos    | 09/30/2021 |



**Reviewed by:**

Emily Nowacki



# Certificate of Analysis

Environmental Testing Laboratories, Inc.  
 37575 W Huron River Drive  
 Romulus, Michigan 48174  
 (734) 955-6600, Fax: (734) 955-6604

## Polarized Light Microscopy Asbestos Analysis Report

To : Air Environmental  
 PO Box 294  
 Santa Rosa, California 95402

ETC Job : 242685  
 Client Project : N/A  
 Date Collected : 09/28/2021  
 Date Received : 09/29/2021

Location : Storage  
 350 Cypress St Fort Bragg CA 95437

| Sample  | Description | Appearance                         | % Fibrous        | % Non-Fibrous | % Asbestos        |
|---|-------------|------------------------------------|------------------|---------------|-------------------|
| 1249395<br>B-1<br>Main Storage<br>Analyst: Dave Cousino<br>Date Analyzed : 09/30/2021         | Drywall     | White<br>Non-Fibrous<br>Homogenous | PLM 3% Cellulose | PLM 97% Other | PLM None Detected |
| 1249395<br>B-1<br>Main Storage<br>Layer-1 Analyst: Dave Cousino<br>Date Analyzed : 09/30/2021 | Texture     | White<br>Non-Fibrous<br>Homogenous | PLM 2% Cellulose | PLM 98% Other | PLM None Detected |
| 1249396<br>B-2<br>Main Storage<br>Analyst: Dave Cousino<br>Date Analyzed : 09/30/2021         | Drywall     | White<br>Non-Fibrous<br>Homogenous | PLM 3% Cellulose | PLM 97% Other | PLM None Detected |
| 1249396<br>B-2<br>Main Storage<br>Layer-1 Analyst: Dave Cousino<br>Date Analyzed : 09/30/2021 | Texture     | White<br>Non-Fibrous<br>Homogenous | PLM 2% Cellulose | PLM 98% Other | PLM None Detected |
| 1249397<br>B-3<br>Common Room<br>Analyst: Dave Cousino<br>Date Analyzed : 09/30/2021          | Drywall     | White<br>Non-Fibrous<br>Homogenous | PLM 3% Cellulose | PLM 97% Other | PLM None Detected |
| 1249397<br>B-3<br>Common Room<br>Layer-1 Analyst: Dave Cousino<br>Date Analyzed : 09/30/2021  | Texture     | White<br>Non-Fibrous<br>Homogenous | PLM 2% Cellulose | PLM 98% Other | PLM None Detected |

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# Certificate of Analysis

Environmental Testing Laboratories, Inc.  
 37575 W Huron River Drive  
 Romulus, Michigan 48174  
 (734) 955-6600, Fax: (734) 955-6604

## Polarized Light Microscopy Asbestos Analysis Report

To : Air Environmental  
 PO Box 294  
 Santa Rosa, California 95402

ETC Job : 242685  
 Client Project : N/A  
 Date Collected : 09/28/2021  
 Date Received : 09/29/2021

Location : Storage  
 350 Cypress St Fort Bragg CA 95437

| Sample  | Description | Appearance                         | % Fibrous         | % Non-Fibrous | % Asbestos        |
|---|-------------|------------------------------------|-------------------|---------------|-------------------|
| 1249398<br>B-4<br>Fundraising Room<br>Analyst: Dave Cousino<br>Date Analyzed : 09/30/2021         | Drywall     | White<br>Non-Fibrous<br>Homogenous | PLM 3% Cellulose  | PLM 97% Other | PLM None Detected |
| 1249398<br>B-4<br>Fundraising Room<br>Layer-1 Analyst: Dave Cousino<br>Date Analyzed : 09/30/2021 | Texture     | White<br>Non-Fibrous<br>Homogenous | PLM 2% Cellulose  | PLM 98% Other | PLM None Detected |
| 1249399<br>B-5<br>Garden Office<br>Analyst: Dave Cousino<br>Date Analyzed : 09/30/2021            | Drywall     | White<br>Non-Fibrous<br>Homogenous | PLM 3% Cellulose  | PLM 97% Other | PLM None Detected |
| 1249399<br>B-5<br>Garden Office<br>Layer-1 Analyst: Dave Cousino<br>Date Analyzed : 09/30/2021    | Texture     | White<br>Non-Fibrous<br>Homogenous | PLM 2% Cellulose  | PLM 98% Other | PLM None Detected |
| 1249400<br>B-6<br>Analyst: Dave Cousino<br>Date Analyzed : 09/30/2021                             | Roofing     | Black<br>Non-Fibrous<br>Homogenous | PLM 3% Cellulose  | PLM 97% Other | PLM None Detected |
| 1249400<br>B-6<br>Layer-1 Analyst: Dave Cousino<br>Date Analyzed : 09/30/2021                     | Felt        | Black<br>Fibrous<br>Homogenous     | PLM 25% Cellulose | PLM 75% Other | PLM None Detected |

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## Polarized Light Microscopy Asbestos Analysis Report

**To :** Air Environmental  
 PO Box 294  
 Santa Rosa, California 95402

**ETC Job :** 242685  
**Client Project :** N/A  
**Date Collected :** 09/28/2021  
**Date Received :** 09/29/2021

**Location :** Storage  
 350 Cypress St Fort Bragg CA 95437

| Sample  | Description       | Appearance                         | % Fibrous         | % Non-Fibrous | % Asbestos        |
|---|-------------------|------------------------------------|-------------------|---------------|-------------------|
| 1249401<br>B-7  | Roofing           | Black<br>Non-Fibrous<br>Homogenous | PLM 3% Cellulose  | PLM 97% Other | PLM None Detected |
| Analyst: Dave Cousino<br>Date Analyzed : 09/30/2021         |                   |                                    |                   |               |                   |
| 1249401<br>B-7  | Felt              | Black<br>Fibrous<br>Homogenous     | PLM 25% Cellulose | PLM 75% Other | PLM None Detected |
| Layer-1 Analyst: Dave Cousino<br>Date Analyzed : 09/30/2021 |                   |                                    |                   |               |                   |
| 1249402<br>B-8  | Roofing           | Black<br>Non-Fibrous<br>Homogenous | PLM 3% Cellulose  | PLM 97% Other | PLM None Detected |
| Analyst: Dave Cousino<br>Date Analyzed : 09/30/2021         |                   |                                    |                   |               |                   |
| 1249402<br>B-8  | Felt              | Black<br>Fibrous<br>Homogenous     | PLM 30% Cellulose | PLM 70% Other | PLM None Detected |
| Layer-1 Analyst: Dave Cousino<br>Date Analyzed : 09/30/2021 |                   |                                    |                   |               |                   |
| 1249403<br>B-9  | Cement Foundation | Gray<br>Non-Fibrous<br>Homogenous  | PLM 3% Cellulose  | PLM 97% Other | PLM None Detected |
| Analyst: Dave Cousino<br>Date Analyzed : 09/30/2021         |                   |                                    |                   |               |                   |
| 1249404<br>B-10   | Cement Foundation | Gray<br>Non-Fibrous<br>Homogenous  | PLM 3% Cellulose  | PLM 97% Other | PLM None Detected |
| Analyst: Dave Cousino<br>Date Analyzed : 09/30/2021         |                   |                                    |                   |               |                   |

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# Certificate of Analysis

Environmental Testing Laboratories, Inc.  
 37575 W Huron River Drive  
 Romulus, Michigan 48174  
 (734) 955-6600, Fax: (734) 955-6604

## Polarized Light Microscopy Asbestos Analysis Report

To : Air Environmental  
 PO Box 294  
 Santa Rosa, California 95402

Location : Storage  
 350 Cypress St Fort Bragg CA 95437

ETC Job : 242685  
 Client Project : N/A  
 Date Collected : 09/28/2021  
 Date Received : 09/29/2021

| Sample  | Description       | Appearance                         | % Fibrous         | % Non-Fibrous | % Asbestos        |
|---|-------------------|------------------------------------|-------------------|---------------|-------------------|
| 1249405<br>B-11   | Cement Foundation | Gray<br>Non-Fibrous<br>Homogenous  | PLM 3% Cellulose  | PLM 97% Other | PLM None Detected |
| Analyst: Dave Cousino<br>Date Analyzed : 09/30/2021         |                   |                                    |                   |               |                   |
| 1249406<br>B-12   | Cement Slab       | Gray<br>Non-Fibrous<br>Homogenous  | PLM 2% Cellulose  | PLM 98% Other | PLM None Detected |
| Analyst: Dave Cousino<br>Date Analyzed : 09/30/2021         |                   |                                    |                   |               |                   |
| 1249407<br>B-13   | Cement Slab       | Gray<br>Non-Fibrous<br>Homogenous  | PLM 2% Cellulose  | PLM 98% Other | PLM None Detected |
| Analyst: Dave Cousino<br>Date Analyzed : 09/30/2021         |                   |                                    |                   |               |                   |
| 1249408<br>B-14   | Cement Slab       | Gray<br>Non-Fibrous<br>Homogenous  | PLM 2% Cellulose  | PLM 98% Other | PLM None Detected |
| Analyst: Dave Cousino<br>Date Analyzed : 09/30/2021         |                   |                                    |                   |               |                   |
| 1249409<br>B-15   | Flat Roofing      | Black<br>Non-Fibrous<br>Homogenous | PLM 2% Cellulose  | PLM 98% Other | PLM None Detected |
| Analyst: Dave Cousino<br>Date Analyzed : 09/30/2021         |                   |                                    |                   |               |                   |
| 1249409<br>B-15   | Felt              | Black<br>Fibrous<br>Homogenous     | PLM 30% Cellulose | PLM 70% Other | PLM None Detected |
| Layer-1 Analyst: Dave Cousino<br>Date Analyzed : 09/30/2021 |                   |                                    |                   |               |                   |

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## Polarized Light Microscopy Asbestos Analysis Report

**To :** Air Environmental  
 PO Box 294  
 Santa Rosa, California 95402

**ETC Job :** 242685  
**Client Project :** N/A  
**Date Collected :** 09/28/2021  
**Date Received :** 09/29/2021

**Location :** Storage  
 350 Cypress St Fort Bragg CA 95437

| Sample  | Description  | Appearance                         | % Fibrous         | % Non-Fibrous | % Asbestos        |
|---|--------------|------------------------------------|-------------------|---------------|-------------------|
| 1249410<br>B-16   | Flat Roofing | Black<br>Non-Fibrous<br>Homogenous | PLM 2% Cellulose  | PLM 98% Other | PLM None Detected |
| Analyst: Dave Cousino<br>Date Analyzed : 09/30/2021         |              |                                    |                   |               |                   |
| 1249410<br>B-16   | Felt         | Black<br>Fibrous<br>Homogenous     | PLM 30% Cellulose | PLM 70% Other | PLM None Detected |
| Layer-1 Analyst: Dave Cousino<br>Date Analyzed : 09/30/2021 |              |                                    |                   |               |                   |
| 1249411<br>B-17   | Flat Roofing | Black<br>Non-Fibrous<br>Homogenous | PLM 2% Cellulose  | PLM 98% Other | PLM None Detected |
| Analyst: Dave Cousino<br>Date Analyzed : 09/30/2021         |              |                                    |                   |               |                   |
| 1249411<br>B-17   | Felt         | Black<br>Fibrous<br>Homogenous     | PLM 30% Cellulose | PLM 70% Other | PLM None Detected |
| Layer-1 Analyst: Dave Cousino<br>Date Analyzed : 09/30/2021 |              |                                    |                   |               |                   |



Lab Supervisor/Other Signatory

Analyst:



Dave Cousino

400 Point Count Results by EPA 600/R-93/116 PLM (denoted by "PC")  
 Item 198.1: PLM Methods for Identifying and Quantitating Asbestos in Bulk Samples  
 Item 198.6: PLM Methods for Identifying and Quantitating Asbestos in Non-Friable Organically Bound Bulk Samples  
 EPA 600/R-93/116: Method for Determination of Asbestos in Bulk Building Materials  
 EPA 600/M4-82-020: Interim Method for Determination of Asbestos in Bulk Insulation Samples  
 A % Asbestos result of "Trace" indicates that the analyzed material was found to contain less than 1% asbestos and would not be considered an Asbestos Containing Material (ACM).

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# Chain of Custody

**Air Environmental**  
 PO Box 294, Santa Rosa, Ca 95402  
 707-408-2080 - CaEnvironmental@gmail.com  
**LEGAL DOCUMENT - PLEASE PRINT LEGIBLY**

For Lab Use Only  
 Lab No. 242685  
 Accept  Reject

| Contact Information |                   | Project Information |   |
|---------------------|-------------------|---------------------|---|
| Company:            | Air Environmental | Phone:              | 707-408-2080                                      |
| Contact:            | Josh Leard        | Cell Phone:         |   |
| Account #:          |                   | E-mail:             | CaEnvironmental@gmail.com                         |
| SAMPLED BY:         | Name: JL          | Date:               | 9-28-21   |
|                     |                   | Project Name:       |   |
|                     |                   | Project Location:   | 350 Cypress St<br>Storage<br>Fort Bragg, Ca 95437 |

| RELINQUISHED BY                 | DATE & TIME    | VIA   | RECEIVED BY         | DATE & TIME             |
|---------------------------------|----------------|-------|---------------------|-------------------------|
| Josh Leard<br><i>Josh Leard</i> | 9-28-21<br>4pm | FedEx | <i>David Cassie</i> | 9-29-21 1155<br>9/29/21 |

REQUESTED SERVICES (Please  the Appropriate Boxes)

|  |   |   |                               |
|--|---|---|-------------------------------|
| <input checked="" type="checkbox"/> PLM Bulk Analysis (EPA 600/R-93/116) | <input type="checkbox"/> PCM NIOSH 7400 | <input type="checkbox"/> TEM Air - NIOSH 7402 | <input type="checkbox"/> Soot |
| <input type="checkbox"/> 400 Point Count                                 |   | <input type="checkbox"/> Tape Lift Analysis   |                               |

TURNAROUND TIME

Rush

Same Day

24 - Hour

3 - Day

5 - Day

| No. | Sample ID | <input checked="" type="checkbox"/> To Be Analyzed | Lab ID  | Description       | Volume | <input checked="" type="checkbox"/> Stop @ 1st Pos | Comments / Notes |
|-----|-----------|--|---------|-------------------|--------|--|------------------|
| 1   | B-1       | <input checked="" type="checkbox"/>                | 1249395 | Main Storage      |        | <input checked="" type="checkbox"/>                | <10% point       |
| 2   | B-2       | <input type="checkbox"/>                           | 396     | "                 |        | <input type="checkbox"/>                           | "                |
| 3   | B-3       | <input type="checkbox"/>                           | 397     | Common Room       |        | <input type="checkbox"/>                           | "                |
| 4   | B-4       | <input type="checkbox"/>                           | 398     | Fundraising "     |        | <input type="checkbox"/>                           | "                |
| 5   | B-5       | <input type="checkbox"/>                           | 399     | Garden Office     |        | <input checked="" type="checkbox"/>                | "                |
| 6   | B-6       | <input type="checkbox"/>                           | 400     | Roofing & felt    |        | <input checked="" type="checkbox"/>                |                  |
| 7   | B-7       | <input type="checkbox"/>                           | 401     | "                 |        | <input type="checkbox"/>                           |                  |
| 8   | B-8       | <input type="checkbox"/>                           | 402     | "                 |        | <input checked="" type="checkbox"/>                |                  |
| 9   | B-9       | <input type="checkbox"/>                           | 403     | Cement Foundation |        | <input checked="" type="checkbox"/>                |                  |
| 10  | B-10      | <input checked="" type="checkbox"/>                | 404     | "                 |        | <input checked="" type="checkbox"/>                |                  |

# Chain of Custody

Air Environmental  
 P.O. Box 294, Santa Rosa, Ca 95402  
 707-408-2080  
**Legal Document**

For Lab Use Only  
 Lab No. 242685  
 Accept  Reject

**Project Information**

Company: Air Environmental

Project Name:

Project Location: 350 Cypress St Storage

| No. | Sample ID | <input checked="" type="checkbox"/> To Be Analyzed | Lab ID              | Description         | Volume / Area | <input checked="" type="checkbox"/> Stop @ 1st Pos | Comments / Notes |
|-----|-----------|--|---------------------|---------------------|---------------|--|------------------|
| 11  | B-11      | <input checked="" type="checkbox"/>                | <del>409</del> 4105 | Cement Foundation   |               | <input checked="" type="checkbox"/>                |                  |
| 12  | B-12      | <input checked="" type="checkbox"/>                | 406                 | Cement Slab         |               | <input checked="" type="checkbox"/>                |                  |
| 13  | B-13      | <input checked="" type="checkbox"/>                | 407                 | "                   |               | <input type="checkbox"/>                           |                  |
| 14  | B-14      | <input checked="" type="checkbox"/>                | 408                 | "                   |               | <input checked="" type="checkbox"/>                |                  |
| 15  | B-15      | <input checked="" type="checkbox"/>                | 409                 | Flat Roofing & Felt |               | <input checked="" type="checkbox"/>                |                  |
| 16  | B-16      | <input checked="" type="checkbox"/>                | 410                 | "                   |               | <input type="checkbox"/>                           |                  |
| 17  | B-17      | <input checked="" type="checkbox"/>                | 411                 | "                   |               | <input checked="" type="checkbox"/>                |                  |
| 18  |           | <input type="checkbox"/>                           |                     |                     |               | <input type="checkbox"/>                           |                  |
| 19  |           | <input type="checkbox"/>                           |                     |                     |               | <input type="checkbox"/>                           |                  |
| 20  |           | <input type="checkbox"/>                           |                     |                     |               | <input type="checkbox"/>                           |                  |
| 21  |           | <input type="checkbox"/>                           |                     |                     |               | <input type="checkbox"/>                           |                  |
| 22  |           | <input type="checkbox"/>                           |                     |                     |               | <input type="checkbox"/>                           |                  |
| 23  |           | <input type="checkbox"/>                           |                     |                     |               | <input type="checkbox"/>                           |                  |
| 24  |           | <input type="checkbox"/>                           |                     |                     |               | <input type="checkbox"/>                           |                  |
| 25  |           | <input type="checkbox"/>                           |                     |                     |               | <input type="checkbox"/>                           |                  |
| 26  |           | <input type="checkbox"/>                           |                     |                     |               | <input type="checkbox"/>                           |                  |
| 27  |           | <input type="checkbox"/>                           |                     |                     |               | <input type="checkbox"/>                           |                  |
| 28  |           | <input type="checkbox"/>                           |                     |                     |               | <input type="checkbox"/>                           |                  |
| 29  |           | <input type="checkbox"/>                           |                     |                     |               | <input type="checkbox"/>                           |                  |
| 30  |           | <input type="checkbox"/>                           |                     |                     |               | <input type="checkbox"/>                           |                  |



