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Pre-Demolition Asbestos, Lead, and Miscellaneous Toxic Materials (Universal Wastes) Survey Report

Fire Station #2 at 800 Baker Street, Costa Mesa, CA

**Prepared For
PBK Architects, Inc.**

October 15, 2024

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Our inspection was performed on October 9, 2024.

Project-Specific Limitations

This was not a limited survey, however, the building was still occupied and to avoid objectionable damage we did not perform destructive sampling, as that would have required disturbing materials which might contain asbestos. The general limitations at the end of this report apply to all projects.

Scope of Services

We provided the following services:

Asbestos Visual Inspection and Information Review

We performed a visual examination of those areas to determine the overall construction and usage of the building(s) and to plan and coordinate the survey work, taking into account any information provided on the age and construction of the building(s). Areas of potential ACM were identified using the available information on the age of the building, construction materials present and the consultant's expertise.

Asbestos Containing Materials (ACMs) Which Are Banned

It is important not to view the dates of the laws / regulations which banned the materials listed below as absolute cut-off dates. In many cases, the laws / regulations allowed suppliers to sell their existing supplies, and the manufacturers may not have immediately been aware of the new laws / regulations. For example, we have spoken with a large manufacturer of drywall joint compound in southern California and learned that they were still manufacturing drywall joint compound with asbestos in the middle 1980s, despite the 1978 US Consumer Product Safety Commission ban (see below). Our experience inspecting thousands of buildings of all types also confirms that asbestos containing drywall joint compound was used in many buildings constructed in the middle 1980s.

- Spray applied fireproofing was banned by the 1973 Clean Air Act (CAA) Asbestos National Emission Standard for Hazardous Air Pollutant (NESHAP);
- Wet-applied and pre-formed (molded) asbestos pipe insulation and pre-formed (molded) asbestos block insulation on boilers and hot water tanks were banned by the 1975 Clean Air Act (CAA) Asbestos National Emission Standard for Hazardous Air Pollutant (NESHAP);
- Spray applied decorative ACM (e.g. acoustic ceiling texture) was banned by the 1978 Clean Air Act (CAA) Asbestos National Emission Standard for Hazardous Air Pollutant (NESHAP);
- Patching compounds which are used to cover, seal or mask cracks, joints, holes and similar openings in the trim, walls, ceiling, etc. of building interiors (also used to create textured effects) which a consumer can purchase (those where the sale

or use of the product by consumers is facilitated, and those containing respirable free form asbestos which are used in residences, schools, hospitals, public buildings or other areas where consumers have customary access) were banned by the US Consumer Product Safety Commission (CPSC) in 1978 - see 16 CFR 1304;

- Artificial emberizing materials (ash and embers) containing respirable freeform asbestos (generally packaged in an emberizing kit for use in fireplaces, and designed for use in such a manner that the asbestos fibers can become airborne under reasonably foreseeable conditions of use were banned by the US Consumer Product Safety Commission (CPSC) in 1977 - see 16 CFR 1305;
- Spray-on application of materials containing more than 1% asbestos to buildings, structures, pipes, and conduits unless the material is encapsulated with a bituminous or resinous binder during spraying and the materials are not friable after drying was banned by the 1990 Clean Air Act (CAA) Asbestos National Emission Standard for Hazardous Air Pollutant (NESHAP);
- Asbestos paper products (flooring felt, roll board, and corrugated, commercial, or specialty paper) were banned by the Toxic Substances Control Act (TSCA) - On July 12, 1989, the US EPA issued a final rule banning most asbestos-containing products. While most of that regulation was overturned by the Fifth Circuit Court of Appeals in New Orleans in 1991, the bans on these materials were affirmed; and,
- Products that have not historically contained asbestos, otherwise referred to as "new uses" of asbestos were banned by the Toxic Substances Control Act (TSCA) - On July 12, 1989, the US EPA issued a final rule banning most asbestos-containing products. While most of that regulation was overturned by the Fifth Circuit Court of Appeals in New Orleans in 1991, the bans on these materials were affirmed.

Various asbestos containing materials were specifically listed as NOT banned by the US EPA's guidance document of May 18, 1999, but this list is far from comprehensive, as many other common materials which are not banned are not listed:

Troweled-on Surfacing Materials (e.g. cement stucco and gypsum plaster);

Asbestos-cement corrugated sheet, shingles, flat sheet, millboard, and pipe;

Asbestos clothing for adults;

Pipeline wrap;

Roofing felt;

Vinyl-asbestos floor tile;

Automatic transmission components;

Clutch facings;

Friction materials;

Brake pads, linings, and blocks;

Gaskets;

Non-roofing coatings; and,

Roof coatings.

Which Materials Commonly Contain Asbestos?

Please see Mr. Masek's book, *Illustrated Practical Asbestos*.

Asbestos Sampling

Representative samples of potential / suspect ACM were collected after identification of homogeneous sampling areas (these are areas in which the materials are uniform in color, texture, construction or application date and general appearance) of potential ACM. Each homogeneous area of potential ACM was observed for material type, location, condition, and friability. Representative samples were collected from each area of potential ACM, excepting areas which were inaccessible, or areas of assumed ACM. The building(s) was examined for the presence of previous or multiple layers of materials, if applicable. If no suspect materials were identified, or if only materials assumed to contain asbestos were identified, no samples were collected.

Most of the laws and regulations regarding asbestos sampling reference the AHERA section on sampling (40CFR763.86). We used that protocol, with additions to be more conservative, but not to overly increase the cost of asbestos surveys. Given the lack of detailed guidance in AHERA regarding miscellaneous materials, our judgement and extensive experience were important factors in determining the appropriate number of samples. For example, we know that drywall joint compound is difficult for the laboratories to analyze due to the presence of binders and such and the relatively low asbestos content, so we collect more samples from an area of it than we would from a similar area of a material such as sheet vinyl flooring which is very easy to analyze and which typically was made with a relatively high asbestos content. Of course, we generally do not sample non-suspect materials (see the table of suspect materials above), except for occasional samples to avoid questions and delays during construction work.

Suspect materials were assumed to contain asbestos or were sampled as follows:

Friable Surfacing Material, which is a friable suspect material sprayed-on, troweled-on, or otherwise applied to surfaces, such as acoustical plaster on ceilings and fireproofing materials on structural members, or other materials on surfaces for acoustical, fireproofing, or other purposes:

- At least three bulk samples from each homogeneous area that is 1,000 ft² or less;
- At least five bulk samples from each homogeneous area that is greater than 1,000 ft² but less than or equal to 5,000 ft²; and,
- At least seven bulk samples from each homogeneous area that is greater than 5,000 ft².

Friable Thermal System Insulation, is applied to pipes, fittings, boilers, breeching, tanks, ducts, or other structural components to prevent heat loss or gain, or water condensation, or for other purposes:

- At least three bulk samples from each homogeneous area;
- At least one bulk sample from each homogeneous area of patched thermal system insulation if the patched section is less than 6 linear or square feet; and,
- In a manner sufficient to determine whether the material is ACM or not ACM, bulk samples from each insulated mechanical system where cement or plaster is used on fittings such as tees, elbows, or valves.

Friable Miscellaneous Materials, which are building materials on structural components, structural members or fixtures, such as suspended ceiling panels:

- Bulk samples from each homogeneous area in a manner sufficient to determine whether the material is ACM or not ACM.

Nonfriable Materials which are building materials on structural components, structural members or fixtures, such as floor tiles:

- In a manner sufficient to determine whether the material is ACM or not ACM, bulk samples from each homogeneous area.

Page 12 of EPA document 340/1-90-018 dated December 1990 unambiguously lists plaster / stucco as non-friable materials.

Sampling was done based on the friability of the material at the time of the asbestos survey.

Reasonable care was taken to reduce accidental fiber release into the building environments. In order to reduce the potential for fiber release while collecting samples of suspect materials, the test areas were sprayed with a water-containing surfactant. The tools used for collection of samples were cleaned with soapy water-soaked cloths between samples in order to avoid cross-contamination of samples. The samples were placed into heavy plastic sample bags which were then sealed and labeled. The location, type, and other information on each sample were recorded.

Asbestos Laboratory Analysis

A chain-of-custody form accompanied the samples to the laboratory. The samples were analyzed by an NVLAP accredited laboratory using the Polarized Light Method (PLM, EPA 600/R-93/116 and/or EPA 600/M4-82-020600M4). The PLM method is, by far, the most commonly used method to analyze bulk materials for the presence of asbestos. This method utilizes the optical properties of minerals to identify the selected constituent. The use of this method enables identification of the type and approximate percentage of asbestos in a given sample. The detection limit of the PLM method for asbestos identification is about one percent by volume.

Lead Survey

The complementary lead survey included identification of suspect areas of lead (paint and ceramic tile glaze) and non-destructive In place testing using a state of the art SciAps X-550 portable XRF (X-Ray Fluorescence) instrument.

Miscellaneous Toxic Materials Survey

The following tasks were performed:

- Inspection of a representative sample of fluorescent light fixtures for the presence of PCB-containing ballasts (that not labeled as not containing PCBs and/or date coded before 1979) and fluorescent tubes containing mercury which need to be recycled;
- Identification of high intensity discharge lighting which may/does contain PCB-containing ballasts;
- Identification of mercury switches, as in thermostats, pressure/level controls, "silent" switches, and such;
- Identification of oil-cooled electrical transformers, containers of transformer oil, oil-filled capacitors, and oil filled high voltage switches not labeled as containing less than 5ppm PCBs and, if specified in our contract, testing them for PCB content (except those without sample ports, and those which are energized, which will be assumed to contain PCBs);
- Identification of refrigeration / HVAC equipment containing refrigerants; and,
- Identification of radioactive (self-illuminating) exit signs.

Asbestos Survey Findings

A Friable material is one which, when dry, may be crumbled, pulverized, or reduced to powder by hand pressure. Non-Friable materials include items such as vinyl floor tile, mastics, plastic roof cement, stucco, drywall joint compound & texture, roofing, and sheet vinyl flooring (when in place and in good condition, friable once disturbed). Over the years, we have encountered

some confusion regarding materials which are fractured, broken, or fragmented. Such damage or deterioration does not make a previously non-friable material friable if it still cannot be crumbled, pulverized, or reduced to powder by hand pressure. Materials such as pipe insulation may not be friable in place, if the fluffy asbestos is covered with wrapping in good condition.

Homogeneous Areas and Samples

To make the following table and this report readily readable, we utilize 12 point or larger type for all but the page footers and attachments. People also do not like having to turn pages to read them, especially if they are reading a screen. For the convenience of readers, we minimize the number of columns by using convenient codes for condition, disturbance potential, friability, removal, and waste handling.

Damage may be physical, due to deterioration, or due to water. Significant Damage means 10% or more evenly distributed, or 25% or greater localized damage. Damage means less than 10% damage (e.g. abraded, gouged, blistered, peeling, crumbling). Good means no or very little damage or deterioration.

Materials may be disturbed by contact, vibration, or air erosion, and all of those possible sources of disturbance are considered in determining if there is potential for significant damage, potential for damage, or low potential for damage.

Taking all of those factors into consideration, materials which contain asbestos (those containing over 1% asbestos are Asbestos Containing Materials) are categorized according to the following Hazard Rank scale:

- worst 7 - Friable with significant damage
- 6a - Friable with damage and potential for significant damage
- 6b - Non-Friable with significant damage and potential for more significant damage
- 5a - Friable with damage and potential for damage
- 5b - Non-Friable with significant damage and potential for additional damage
- 5c - Non-Friable with damage and potential for significant damage
- 5d - Friable in good condition and potential for significant damage
- 4a - Non-Friable with significant damage and low potential for disturbance
- 4b - Friable with damage and low potential for disturbance
- 3a - Friable in good condition and potential for damage
- 3b - Non-Friable with damage and potential for damage
- 3c - Non-Friable in good condition and potential for significant damage
- 2a - Friable in good condition and low potential for disturbance
- 2b - Non-Friable with damage and low potential for disturbance
- 2c - Non-Friable in good condition and potential for damage
- best 1 - Non-Friable in good condition and low potential for disturbance

Category I non-friable ACM is any asbestos-containing packing, gasket, resilient floor covering or asphalt roofing product which contains more than one percent (1%) asbestos as determined using polarized light microscopy (PLM) according to the method specified in Appendix A, Subpart F, 40 CFR Part 763. (Sec. 61.141), or assumed to be such.

Category II non-friable ACM is any material, excluding Category I non-friable ACM, containing more than one percent (1%) asbestos as determined using polarized light microscopy according to the methods specified in Appendix A, Subpart F, 40 CFR Part 763 that, when dry, cannot be crumbled, pulverized, or reduced to powder by hand pressure. (Sec. 61.141), or assumed to be such.

If all or portions of materials which contain asbestos are removed (using typical methods and equipment), the following Waste codes indicate how the waste should be disposed:

F - Friable, hazardous asbestos waste;

NF - Non-Friable, non-hazardous asbestos waste,

O - OSHA regulations regarding materials containing greater than zero, but less than 1% asbestos apply. Dispose as construction debris or non-friable asbestos waste, depending on the requirements of the landfill where the waste is disposed.

Suspect materials which are not sampled must be assumed to contain asbestos. Materials are typically assumed to contain asbestos due to the material being readily identifiable (e.g. asbestos-cement items), or lack of access.

We generally omit the prefix of the sample numbers from the sketch(es) or drawings for clarity. Such prefixes are used solely to prevent the laboratory from accidentally mixing samples from different batches.

Please see the Scope of Services section above for information on our sampling protocols.

We use the words “roughly” or “approximately” with quantities to prevent contractor change orders for minor variations in quantity. Contractors should verify the site conditions, material location(s), and quantities to their satisfaction prior to committing to a price for removal work.

Homogeneous Area (an area of material uniform in color, texture, construction or application date and general appearance)	Sample Number	Specific Sample Location If one or more samples contain asbestos, the entire homogeneous area must be treated as asbestos containing	Lab. Result % or None Detec ted	Asbestos Containing Materials	
				Hazard Rank	Waste
top (thin, white) layer of plaster on walls and ceilings	800-1	in the electrical closet off garage, at existing hole	ND	3c	O
	800-6	in the supply closet off day room	ND		
	800-10	in the exercise room where damaged	ND		
	800-13	in the corridor at the door where damaged	<1		

Homogeneous Area (an area of material uniform in color, texture, construction or application date and general appearance)	Sample Number	Specific Sample Location If one or more samples contain asbestos, the entire homogeneous area must be treated as asbestos containing	Lab. Result % or None Detec ted	Asbestos Containing Materials	
				Hazard Rank	Waste
bottom (gray) layer of plaster	800-2	in the electrical closet off garage, at existing hole	ND	3c	O
	800-7	in the supply closet off day room	ND		
	800-11	in the exercise room where damaged	ND		
	800-14	in the corridor at the door where damaged	<1		
drywall joint compound & texture in the remodeled dormitory/kitchen areas	800-3	on a partial wall in the dormitory	ND		
	800-4	on the corner of the corridor in the dormitory area, where damaged	ND		
	800-5	in the dormitory corridor where damaged	ND		
	800-8	on the corner in the kitchen where damaged	ND		
	800-9	in the kitchen at window where damaged	ND		
	800-12	over plaster above the door from the office to the garage	ND		
top (color) layer of stucco	800-15	on the recreation room corner where damaged	ND	3c	O
	800-17	right rear corner near water heater closet	ND		
	800-23	on the garage at roof level	<1		
bottom (gray) layer of stucco	800-16	on the recreation room corner where damaged	ND		
	800-18	right rear corner near water heater closet	ND		
	800-24	on the garage at roof level	ND		

Homogeneous Area (an area of material uniform in color, texture, construction or application date and general appearance)	Sample Number	Specific Sample Location If one or more samples contain asbestos, the entire homogeneous area must be treated as asbestos containing	Lab. Result % or None Detec ted	Asbestos Containing Materials	
				Hazard Rank	Waste
roofing under the tar and rocks	800-19	rear right section	ND		
	800-21	front right corner	ND		
brown tar paper under roofing	800-20	rear right section	ND		
	800-22	front right corner	ND		
plastic roof cement spots	800-25	around the sewer vent, front right	ND		
	800-26	around the sewer vent, back right	ND		
	800-27	on HVAC metal duct work	ND		
	800-28	where the HVAC duct goes through the roof	ND		
assumed asbestos cement panel on the roof level, roughly 12 Sq. Ft.	N/a	n/a - assumed, identified visually	n/a	1	NF

Lead (paint and ceramic tile) Survey Findings

No lead-based paint (XRF readings greater than or equal to 1.0 mg/cm² in most places) was identified.

No lead-glazed ceramic tile (XRF readings $\geq$ 1.0 mg/cm²) was identified.

Solid lead sewer vent flashings were identified on the roof.

Lead Survey Samples

A room equivalent is an identifiable part of a building (e.g., room, exterior, corridor, stairway, foyer, Etc.). Closets or other similar areas adjoining rooms are not considered as separate room equivalents unless they are obviously dissimilar from the adjoining room equivalent.

The regulations require one reading from each testing combination, except for walls, where one reading is required from each wall (up to a maximum of four readings from the largest walls in testing combinations with more than four walls).

Each testing combination may be composed of more than one building component (such as two similar windows within a room equivalent).

For multifamily developments or apartment buildings, common areas and exterior sites are

treated as separate types of units, not as room equivalents.

If similar building component types with identical substrates (such as windows) are all found to contain lead paint in the first five interior room equivalents, testing of that component type in the remaining room equivalents may be discontinued.

Surfaces covered with wallpaper are assumed to be painted.

For varnished, stained, or similar clear-coated floors, measurements in only one room equivalent are permissible if it appears that the floors in the other room equivalents have the same coating.

Some testing combinations have multiple parts. For example:

- All of the parts of an interior window sash;
- All of the parts of the window frame and trim (casings, stops, jambs, aprons, Etc.);
- All of the parts of baseboard assembly (main board, quarter round, and so forth);
- All of the parts of a door (stiles, rails, panels, mullions, panels, Etc.); and,
- All of the parts of a door frame assembly (jambs, stops, transoms, casings, Etc.).

Because it is highly unlikely that all the parts would have different painting histories, they are not considered separate testing combinations, unless we have substantial evidence that different parts have separate, distinct painting histories.

When the plus or minus indication on the XRF instrument is such that adding the amount indicated to the reading would cause it to be equal to or over the positive level (1 or 0.7, depending on the locality), we add it and report that amount.

Testing Combinations			Color	Condition G - good F- fair P- poor	Lead mg/cm ²
Room Equivalent	Component	Substrate W - wood P - plaster S - stucco M - metal D - drywall			
	calibration 1.04				1.1
	Calibration 1.04				1.1
	Calibration 1.04				1.0
Exterior	parking lot stripes	asphalt	white	g	0.00
	"	"	blue	g	0.00
	wall	s	tan	g	0.00
	wall	s	tan	g	0.00

Testing Combinations			Color	Condition G - good F- fair P- poor	Lead mg/cm ²
Room Equivalent	Component	Substrate W - wood P - plaster S - stucco M - metal D - drywall			
	down spout	m	tan	g	0.00
	roof ladder	m	tan	g	0.1
	Roll up door frame	m	tan	g	0.00
	wall	s	tan	g	0.00
Garage	floor	concrete	red	g	0.00
	wall	s	tan	g	0.00
	side door	m	gray	g	0.1
	Door	m	gray	g	0.00
Locker	wall	d	white	g	0.02
	door frame to garage	m	red	g	0.5
Garage	wall	d	white	g	0.2
	Wall stripe	d	red	f	0.2
	Door frame to dormitory	m	tan	g	0.3
	Door	w	tan	g	0.05
	wall	p	white	g	0.00
dormitory	wall	d	white	g	0.00
	door frame	w	white	g	0.00
	door	w	white	g	0.00
	wall	d	white	g	0.00
	door frame	w	white	g	0.00
	door	w	white	g	0.00
	wall	d	white	g	0.00
	closet door frame	w	white	g	0.2
	Closet door	w	white	g	0.5
	Wall	d	white	g	0.00
	locker room door frame	w	white	g	0.00
	door	w	white	g	0.00
	locker cabinet	w	natural wood	g	0.00
	shower wall	epoxy coating	multi	g	0.00
Restroom	wall	p	white	g	0.5
	Wall	p	white	g	0.4

Testing Combinations			Color	Condition G - good F- fair P- poor	Lead mg/cm ²
Room Equivalent	Component	Substrate W - wood P - plaster S - stucco M - metal D - drywall			
	Stall	m	beige	g	0.1
	Door frame	w	white	g	0.00
	door	w	white	g	0.00
Corridor	ceiling	p	white	g	0.2
	Door to exercise room	w	white	g	0.8
	Door	w	white	g	0.2
Exercise	wall	p	white	g	0.00
	closet door	w	white	g	0.6
	Door frame	w	white	g	0.1
	Door to exterior	w	beige	g	0.00
	door frame	w	gray	g	0.1
	Wall	p	white	g	0.00
Kitchen	wall	d	white	g	0.00
	ceiling	d	white	g	0.00
	wall	d	white	g	0.00
	cabinets	w	natural	g	0.00
	floor	ceramic tile	pink	g	0.00
	door to exterior	w	white	g	0.2
	Closet door frame	w	white	g	0.3
	Closet door	w	white	g	0.7
Corridor	door frame	w	white	g	0.00
	door to day room	w	white	g	0.1
	Door to exercise room	w	white	g	0.7
	Wall	p	white	g	0.00
Captain's	door frame	w	white	g	0.00
	door	w	white	g	0.6
	Wall	p	white	g	0.00
	restroom door frame	w	white	g	0.2
	Door frame	w	white	g	0.5
	Restroom wall	p	white	g	0.02
Dormitory	wall	p	white	g	0.1
	door frame	w	white	g	0.00

Testing Combinations			Color	Condition G - good F- fair P- poor	Lead mg/cm ²
Room Equivalent	Component	Substrate W - wood P - plaster S - stucco M - metal D - drywall			
	door	w	white	g	0.00
	wall	p	white	g	0.00
Corridor	wall	p	white	g	0.00
	door to garage	w	gray	g	0.6
	Door frame	w	gray	g	0.7
	Wall	p	white	g	0.00
work shop	door frame	m	red	g	0.3
	Wall	p	white	g	0.2
Laundry	door frame	m	red	g	0.3
	Wall	p	white	g	0.4
Utility	door frame	m	red	g	0.2
	Wall	p	white	g	0.2
	Electrical cabinet	m	gray	g	0.1
Garage	roll up door	m	gray	g	0.00
	calibration	1.04			1.1

Miscellaneous Toxic Materials (universal wastes) Survey Findings

We examined the building(s) and identified the following materials:

Batteries

We observed batteries in emergency lights.

Fluorescent and HID Lamps/Bulbs and Ballasts

8' Tubes	4' Tubes	PCB Fluorescent Ballasts	HID Lamps & Ballasts
	170	0	0

Refrigerants

We observed one split system unit on the roof.

Mercury

We observed no mercury switches.

Miscellaneous Drums / Containers and Oil-Filled Devices

We observed various cleaning and maintenance materials.

Radioactive Exit Signs

We observed none.

Building Description and Photographs

The photographs are important parts of the descriptive information.

The subject property contains a fire house probably built in the 1960's. The exterior is finished with stucco and masonry walls. The roof is covered with tar & rocks over roll roofing. The interior is finished with plaster, drywall in remodeled areas of kitchen and dormitory, carpet on concrete, ceramic tile on the kitchen floor, non-slip coating on the restroom floor. Metal HVAC ducts were observed on the roof. No insulated pipes were observed at the plumbing hatch. We did not open the walls as the building was still occupied.



Photo 1: The back of the station



Photo 2: The garage



Photo 3: The clothing and equipment room



Photo 4: The shop and laundry room area



Photo 5: The main electrical and phone room



Photo 6: The dormitory area with newer partial walls of drywall



Photo 7: The main restroom



Photo 8: We did not observe any pipe insulation, but some may be present and hidden from view



Photo 9: The kitchen

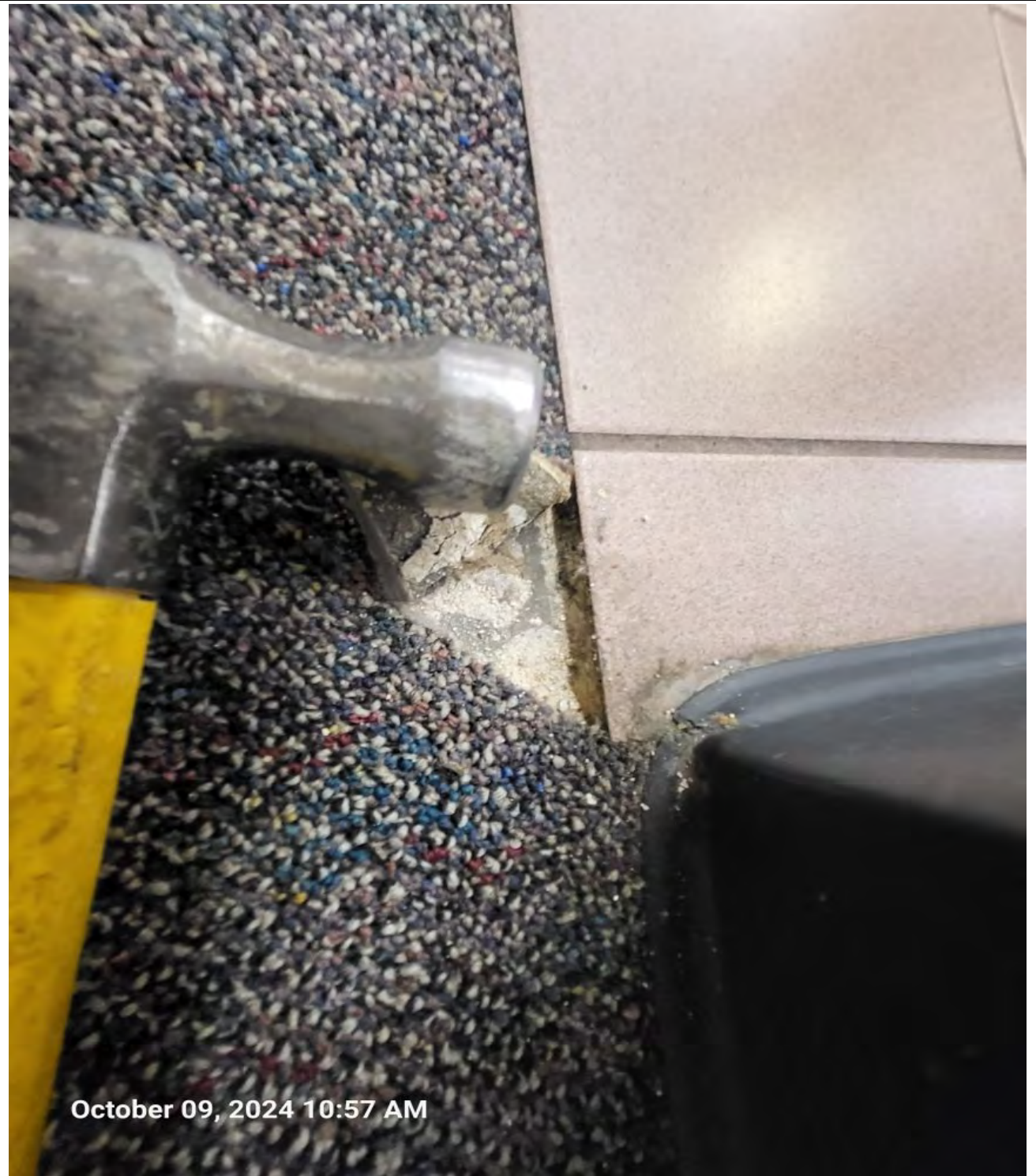


Photo 10: One of the locations where we observed clean concrete under the carpet (and nothing visible under the ceramic tile)

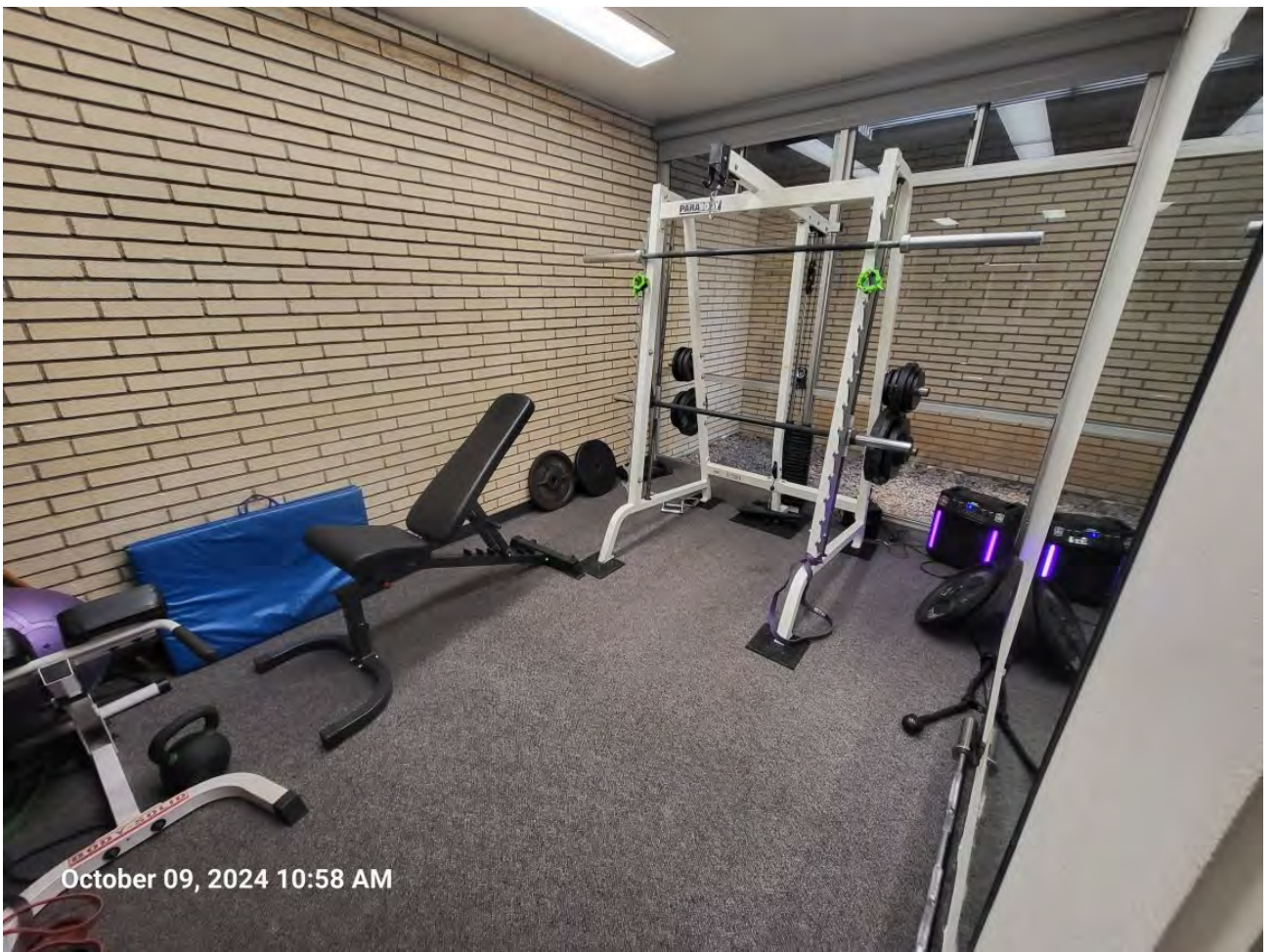


Photo 11: The small work-out room



Photo 12: Another example of the several locations where we observed clean concrete under the carpet



Photo 13: The roof and the one HVAC unit



Photo 14: A typical lead flashing at a vent pipe



Photo 15: The asbestos-cement window panel

Recommendations

All persons who read and use this report should read the entire report and all of the attachments.

While not required by any laws or regulations (except for certain work in schools), we highly recommend that all clients have us oversee, monitor, and document remediation and/or abatement work for all but the smallest projects. It is routine for many clients, especially “deep pocket” organizations and major property owners and managers. However, all clients would benefit from having us present to quickly identify deficiencies, make decisions on unusual conditions encountered, and document how the work was done. This is important for preventing costly problems and delays during the work. It is also vital for defending against claims of deficiencies which arise during or after, sometimes years after, the work is performed.

Information on laws and regulations is provided as a convenience, not as a substitute for proper legal advice and review of the entire text of the applicable laws and regulations.

Miscellaneous Toxic Materials

There are numerous laws and regulations covering the handling, transport, and disposal of toxic materials. All of the miscellaneous toxic materials should be properly handled, packed, transported and disposed by workers with proper training and personal protective equipment, including, but not limited to:

- Proper removal and disposal of all batteries, with recycling of all lead-acid batteries;
- Assuming that all fluorescent lamp tubes and mercury-vapor lamps contain levels of mercury which require that they be properly disposed, and careful removal and packing of them, then transport to a recycling company;
- Assuming that all lamp ballasts / HID ballasts contain PCBs, except those found to be marked / date coded as not containing PCBs, and removal and packing for recycling and disposal by transportation to a recycling company (**not land fill disposal**);
- Proper removal and disposal of all devices containing oils, such as air conditioning compressors, pumps, compressors, etc.;
- Proper removal and disposal of all refrigerants from all equipment containing refrigerants, such as chillers, air conditioners, water coolers, and refrigerators/freezers (the technician(s) performing the refrigerant recovery must be trained and certified under Section 608 of the Clean Air Act, 40CFR Part 82); and,
- Collection, packaging, and proper disposal (by recycling) all mercury containing switches and mercury thermometers.

Limitations of Polarized Light Microscopy (PLM) Analytical Methods

It is possible that materials reported to contain less than 1% asbestos by Polarized Light Microscopy (PLM) analysis may or may not actually contain asbestos. Non-friable Organically Bound (NOB) such as floor tiles (vinyl and asphalt), roofing materials, mastics, and caulking may contain asbestos which is tightly bound to the matrix material and therefore not easily isolated and detected by microscopy. PLM may not detect asbestos fibers less than 0.2 microns in diameter. Because asbestos fibers found in NOB materials may be less than 0.1 microns in diameter, this method can sometimes yield low estimates or even false negative results. In New York, both PLM and TEM analysis is required in order to declare that samples of NOB materials do not contain asbestos. Clients in other areas may wish to have samples of non-friable organically bound materials reported as “none detected” under PLM analysis re-analyzed by TEM.

No SCAQMD Abatement Notification Required

As less than 100 square feet of Asbestos Containing materials (the one small window panel) were identified, no abatement notification to the South Coast Air Quality Management District (SCAQMD) is required.

Notifications to Employees, Contractors, Tenants, and the Public:

- 1) Building owners must notify their employees and other owners (e.g. of tenant companies) within 15 days of their knowledge of the presence of asbestos containing materials (Connelly Act, AB 3713, California Health and Safety Code, Section 25915), and annually thereafter.
- 2) Federal OSHA construction asbestos regulations, 29CFR1926.1101 (k), and the corresponding California regulations, apply to communication of hazards during construction activities.
- 3) Federal OSHA general industry asbestos regulations, 29CFR1910.1001(j)(2)(i), and the corresponding California regulations, require that building owners determine the presence, location, and quantity of materials which contain asbestos at the work site, and inform employees about the presence and location of those materials. Again, tenants are not employees. While this aspect of the regulation is widely ignored, as most commercial buildings have either not been inspected for asbestos, or only partially inspected, we suggest that all building owners implement an asbestos management (O&M) program based on at least a walkthrough asbestos survey. Asbestos was used in many common building materials up to the late 1980s, so having an asbestos management program in place minimizes liability and costs.
- 4) Federal OSHA general industry asbestos regulations, 29CFR1910.1001(j)(2)(iii) requires that building owners inform employers of employees, and employers inform employees who will perform housekeeping activities in areas which contain asbestos (actual or presumed) of the presence and location of those materials which may be contacted during such activities.

5) Federal OSHA general industry asbestos regulations, 29CFR1910.1001(j)(4)(i), and the corresponding California regulations, require that building owners or employers affix or post labels or signs so that employees will be notified of what materials contain, or are presumed to contain, asbestos. The labels are to be attached in such areas where they will clearly be noticed by employees who are likely to be exposed, such as at the entrance to mechanical room/areas. The labels must comply with the requirements of 29 CFR 1910.1200(f) of OSHA's Hazard Communication standard, and must include the following information:

DANGER

CONTAINS ASBESTOS FIBERS

AVOID CREATING DUST

CANCER AND LUNG DISEASE HAZARD

6) There is a slight variation in wording of the warnings in California's Connelly Act, AB 3713, California Health and Safety Code, Section 25915:

CAUTION.

ASBESTOS.

CANCER AND LUNG DISEASE HAZARD.

DO NOT DISTURB WITHOUT PROPER TRAINING AND EQUIPMENT

so we usually develop signs and labels which are a combination of the California and OSHA wording.

7) In a January 24, 1996 letter to Ms. Lisa K. Rushton interpreting their 29CFR1910.1101 and 29CFR1926.1101 regulations, OSHA stated: "Signs and labels are required to be posted on or near the product. However, it is generally not feasible to put labels on walls and floors. If it is not feasible, alternatives may be used. For example, if asbestos containing floors are being serviced by employees using a common equipment room day after day, then a sign or label for the asbestos flooring can be posted in that room."

8) California's Connelly Act, AB 3713, California Health and Safety Code, Section 25915, Sub-Section 25915.5 states: "An owner required to give notice to employees pursuant to this chapter, in addition to notifying his or her employees, shall mail, in accordance with this subdivision, a copy of that notice to all other persons who are owners of the building or part of the building, with whom the owner has privity of contract. Receipt of a notice pursuant to this section by an owner, lessee or operator shall constitute knowledge that the building contains asbestos-containing construction materials for purposes of this chapter. Notice to an owner shall be delivered by first-class mail addressed to the person and at the address designated for the receipt of notices under the lease, rental

agreement, or contract with the owner. "

9) The California Proposition 65 notification signs which building owners (excepting many or most government buildings) should have posted on your buildings cover many materials and substances, but they are not sufficient for notifying employees or contractors working on the building.

Contractor / Employer Registration / Licensing

An employer who will be engaging in asbestos-related work involving 100 square feet or more of surface area of asbestos-containing construction material must be registered with DOSH. Asbestos abatement contractors must have this registration in addition to a contractor's license, so they are typically used to perform such work. The square footage of ACCM to be disturbed is computed by adding up the surface area of all ACCMs which will be handled during the course of the work being performed by the employer, even if it is in noncontiguous locations in all of the buildings, structures, premises, fixtures, machinery or other areas which will be handled during the course of the work for which the employer has contracted, whether pursuant to single or multiple contracts with the same hirer. This generally means that a licensed asbestos abatement contractor must be utilized, unless a particular employer feels that they will have enough asbestos work that training and equipping some of their staff and becoming registered is cost effective.

If the work involves less than 100 sq. ft. of ACCM, the employer must send a simple "report of use" to Cal/OSHA. All other occupational health and safety work rule requirements apply- especially those from Title 8 of the California Code of Regulations, 1529. For more information about "reports of use" and the database of carcinogen use reports, call 415-703-5190. Also, see 8 CCR 5203, the Carcinogen Report of Use Requirements.

More information may be found on the DOSH web site.

OSHA Asbestos Regulations:

The federal OSHA asbestos regulations for the construction industry are contained in 29CFR1926.1101. The corresponding California regulations are at California Code of Regulations, Title 8 - Industrial Relations, Division 1- Industrial Relations, Chapter 4 - Division of Industrial Safety, Sub-chapter 4 - Construction Safety Orders, Article 4 - Dusts, Mists, Fumes, Vapors, and Gases, §§1529. Asbestos.

All of these OSHA regulations use the following definitions:

ACM is Asbestos Containing Material (also ACBM, which is Asbestos Containing Building material)

PACM is Presumed Asbestos Containing Material;

Surfacing Material is material that is sprayed, troweled-on or otherwise applied to surfaces, such as acoustical plaster on ceilings and fireproofing materials on structural members; and,

TSI is Thermal System Insulation (e.g. pipe and boiler insulation).

The California regulations mirror the federal OSHA regulations, and defines four classes of work on asbestos containing materials:

"Class I asbestos work" means activities involving the removal of TSI and surfacing ACM and PACM.

"Class II asbestos work" means activities involving the removal of ACM which is not thermal system insulation or surfacing material. This includes, but is not limited to, the removal of asbestos-containing wallboard, floor tile and sheeting, roofing and siding shingles, and construction mastics.

"Class III asbestos work" means repair and maintenance operations, where "ACM", including TSI and surfacing ACM and PACM, is likely to be disturbed. "Disturbance" means activities that disrupt the matrix of ACM or PACM, crumble or pulverize ACM or PACM, or generate visible debris from ACM or PACM. Disturbance includes cutting away small amounts of ACM and PACM, no greater than the amount which can be contained in one standard sized glove bag or waste bag in order to access a building component. In no event shall the amount of ACM or PACM so disturbed exceed that which can be contained in one glove bag or waste bag which shall not exceed 60 inches in length and width.

"Class IV asbestos work" means maintenance and custodial activities during which employees contact but do not disturb ACM or PACM and activities to clean up dust, waste and debris resulting from Class I, II, and III activities.

The regulations require that all Class I, II and III asbestos work shall be conducted within regulated areas, with all of the related requirements for demarcation, signs, respirators, and so forth.

All asbestos work performed within regulated areas must be supervised by a competent person. A competent person for Class I and Class II work must be trained as an asbestos supervisor, as originally defined in the US EPA Asbestos Hazard Emergency Response Act (AHERA), 40 CFR 763 - available on the US EPA web site.

For Class III work, the competent person need only have the 16 hour training required for maintenance and custodial staff who disturb ACMs (also known as Operations & Maintenance or O&M training).

The OSHA regulations at 29CFR1926.1101(k)(9)(iii) require that training of workers for Class I operations and for Class II operations that require the use of critical barriers (or equivalent isolation methods) and/or negative pressure enclosures be the equivalent in curriculum, training method and length to the EPA Model Accreditation Plan (MAP) asbestos abatement workers training (40 CFR Part 763, subpart E, appendix C). However, 1926.1101(k)(9)(iv)(A) covering work with asbestos containing roofing materials, flooring materials, siding materials, ceiling tiles, or asbestos cement panels, allows a much shorter 8 hour training class for workers. That shorter class must include "hands-on" training and all the elements included in paragraph

(k)(9)(viii) of that section, plus the specific work practices and engineering controls set forth in paragraph (g) of that section which specifically relate to the category of work to be performed.

Many private training facilities provide the asbestos supervisor and worker initial and annual refresher training classes, as well as the O&M training classes. Unless it is reasonably certain that the supervisor and workers will never need to disturb more than the small amount of ACM allowed under Class III, they need the normal AHERA supervisor and worker classes.

Despite the small size of Class III projects, they must be conducted using engineering and work practice controls which minimize the exposure to employees performing the asbestos work and to bystander employees:

(A) The work shall be performed using wet methods.

(B) To the extent feasible, the work shall be performed using local exhaust ventilation.

(C) Where the disturbance involves drilling, cutting, abrading, sanding, chipping, breaking, or sawing of thermal system insulation or surfacing material, the employer shall use impermeable drop cloths, and shall isolate the operation using mini-enclosures or glove bag systems or another isolation method.

(D) Where the employer does not produce a "negative exposure assessment" for a job, or where monitoring results show the PEL (Permissible Exposure Limit) has been exceeded, the employer shall contain the area using impermeable drop cloths and plastic barriers or their equivalent, or shall isolate the operation using another listed and compliant control system.

(E) Employees performing Class III jobs, which involve the disturbance of thermal system insulation or surfacing material, or where the employer does not produce a "negative exposure assessment" or where monitoring results show a PEL has been exceeded, shall wear respirators which are selected, used and fitted according to the applicable regulations.

Federal OSHA published a nice informal summary of their asbestos regulations for the construction industry, publication OSHA3096, Revised in 2002. It is available online.

Materials Greater Than Zero, But Less Than 1% Asbestos

Our extensive experience and that of the best consultants and laboratories in our industry over the past three decades indicates that most materials reported to contain less than 1% asbestos by Polarized Light Microscopy (PLM) do contain asbestos, and many well over 1% asbestos. Unfortunately, too many other people, including many in the environmental consulting, abatement contracting, and other contracting industries, do not know this and do not know that work involving materials which contain less than one percent asbestos is still covered by numerous regulations.

Letters from the federal Occupational Safety and Health Administration (OSHA) interpreting their regulations make it clear that materials containing less than 1% asbestos are still covered

by significant portions of their asbestos regulations and that employers must exercise due diligence to avoid violations and exposures to asbestos. Some of those are:

A letter dated April 17, 1997 to Mr. Leon Petrakis states that the OSHA standard covers both "asbestos" and "asbestos-containing materials" and that "asbestos that is present in percentages less than one percent continues to be covered by the OSHA standard."

A letter dated August 13, 1999 to Mr. Walter Chun regarding demolition (including during renovation) of materials containing less than one percent asbestos makes several key points:

- Unless the contractor produces an initial negative exposure assessment showing that neither asbestos Permissible Exposure Limit (PEL) will be exceeded, they must comply with the many elements of the standard that are applicable when either asbestos PEL is exceeded.
- Even if neither asbestos PEL is exceeded or might be exceeded, the use of wet methods and prompt clean-up and disposal of wastes and debris, as well as record keeping requirements associated with the negative exposure assessment, still apply.
- Employees who are working while the contractor seeks to produce a negative exposure assessment must be provided with the protective clothing described in 29 CFR 1926.1101(I), at least half-mask air-purifying respirators with high efficiency filters, and training that meets the mandates of 29 CFR 1926.1101(k)(9)(viii).

A letter dated February 1, 2005 to Mr. Skip Bolding indicates that removal of drywall is Class II work if any of the components of the drywall system (e.g. the drywall joint compound) contain more than 1% asbestos. It goes on to state that if none of the components contain more than 1% asbestos, the requirements depend on whether the employee exposures to airborne asbestos exceed either the 30-minute or 8-hour PELs. Even if neither PEL is exceeded, wet methods, prompt clean-up and disposal of wastes and debris contaminated with asbestos in leak-tight containers, and prohibitions against the use of high speed abrasive saws without HEPA-filtered exhaust, compressed air removal, and employee rotation to lower exposure still apply.

The California Code of Regulations, Title 8, Chapter 3.2. California Occupational Safety and Health Regulations (DOSH or CAL/OSHA), Subchapter 2. Regulations of the Division of Occupational Safety and Health, Article 2.5. Registration – Asbestos-Related Work, Sub-section 341.6. Registration Requirements, defines an Asbestos Containing Construction Material (ACCM) as any manufactured construction material which contains more than 1/10th of 1% (0.1%) asbestos by weight.

There are several issues:

- 1) The Polarized Light Microscopy (PLM) method commonly used really only has a resolution of about 1%.

- 2) The analytical method and laboratory accreditation people require that the laboratory report seeing asbestos in a sample, even if they do not see enough to feel comfortable calling it 1%. We have seen such samples which we have collected under a PLM microscope, and a sample prepared by the National Voluntary Laboratory Accreditation Program with 0.3% asbestos, and the asbestos was clearly visible in those samples.
- 3) Many of the materials contain binders and such which obscure the asbestos fibers, especially the finer fibers.
- 4) Materials such as stucco have an inconsistent asbestos content, as they were field mixed (We have met “old-timers” in the construction industry who told us that they used one coffee can of asbestos per mixer barrel of stucco).
- 5) Analysis by a Transmission Electron Microscope is the only proper method for additional analysis of non-friable materials, as PLM point counting is known to miss asbestos found by TEM analysis, and TEM analysis is essentially the same or lower cost than the far less accurate point counting. Please see the News section of our web site for an article on point counting. Due to the cost of additional analysis, few clients ever request anything beyond routine PLM analysis.
- 6) Both EPA and OSHA regulate asbestos, so the regulations of both, and corresponding state and local regulations, must be considered.

Materials Containing Less Than 10% Asbestos by PLM

The United States Environmental Protection Agency issued a document regarding materials found to contain less than 10% asbestos by Polarized Light Microscopy (PLM) on May 8, 1991 titled Applicability Determination Index Control Number: C112 which states:

“If the amount by visual estimation appears to be less than 10 percent, the owner or operator may (1) assume the amount to be greater than 1 percent and treat the material as asbestos-containing material, or (2) require verification of the amount by point counting.”

That document makes no mention of applicability only to friable materials, and we believe that is a typographical error.

The Asbestos Hazard Emergency Response Act signed by President Reagan in 1986 (AHERA, 40CFR Part 763, Subpart E) states that “point counting” is applicable to all bulk samples of **friable insulation materials** submitted for identification and quantitation of asbestos components.

We sent a letter to the Environmental protection Agency regarding this matter, and their response dated November 19, 2020 makes it clear that point counting is indeed applicable to **friable materials**. It states:

“Applicability Determination Index: Control Number C112 does not determine whether polarized light microscopy (PLM) point counting may be used to comply with the Asbestos National Emission Standards for Hazardous Air Pollutants

(NESHAP). That authority resides in the Asbestos NESHAP itself, see the definition for friable asbestos material at 40 CFR 61.141 and provided below:

Friable asbestos material means any material containing more than 1 percent asbestos as determined using the method specified in appendix E, subpart E, 40 CFR part 763, section 1, Polarized Light Microscopy, that, when dry, can be crumbled, pulverized, or reduced to powder by hand pressure. If the asbestos content is less than 10 percent as determined by a method other than point counting by polarized light microscopy (PLM), verify the asbestos content by point counting using PLM."

Unless our client requests additional analysis by TEM (far superior to, and less expensive than point counting), we assume that all friable materials reported to contain greater than zero, but less than 10% asbestos are Asbestos Containing Materials.

General Limitations

The conclusions presented in this report are professional opinions based on the indicated data described in this report. Opinions and recommendations presented herein apply to site conditions existing at the time of the site visit(s). Changes in the conditions of the property may occur with time due to natural processes or various activities on the subject property. Changes in applicable codes and standards may also occur as a result of legislation or the broadening of knowledge. Accordingly, this report may become invalid. This report is intended only for the client, purpose, location, and project indicated. The only persons or companies which may rely on it are our client, an abatement contractor hired by our client, and the client of our client when we are sub-consultants. All others may not rely upon this report without having a contract in place with us. We do not warrant that the information supplied to us by others is accurate.

Reports such as this prepared by any consultant are never intended to be definitive studies of the presence of asbestos and/or lead at the subject properties. Other locations of asbestos and/or lead may exist at the subject property, and the levels may vary from those stated in this report. There may be variations in the composition of materials which appear similar. Materials may be hidden from view and not accessible. This is especially so for occupied structures or structures where damage and invasive sampling need to be minimized (such as structures not owned by our client).

For pre-demolition surveys of vacant buildings, we do not hesitate to examine the structure in several areas, looking for multiple layers of materials and materials which are under other materials. We very, very rarely miss anything. However, we are performing surveys, not demolition work, so may not see things such as a patch of floor tile hidden under carpeting, and not detected by our typical examination of the area under the carpet at a corner(s) or existing hole(s). We examine the structure(s) in several locations, but do not pull up all of the carpet, or cut numerous holes in floors and walls. That would constitute demolition work, not survey work, and could also create contamination due to excessive disturbances of suspect materials.

Elevator brakes are not sampled, as they are the responsibility of the elevator maintenance firm only, and to avoid damage to the brake.

Location and sampling of underground items, such as asbestos-cement pipes, and sampling of sample asphalt, concrete, and gravel would have been outside of the scope of services for this project.

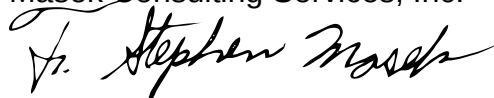
Company Background

Since 1991 we have provided services at many thousands of properties of all types. Our goals have always been to produce superior reports, offer superior value, and provide superior service. Significantly, about 33% of our revenue has been from sub-consulting work for medium and large consulting companies who demand top quality and choose to trust us to do work for their clients. Our clients include investors, architects, lenders, attorneys, government organizations, property management firms and other consulting firms. We provide a wide range of services needed for pre-acquisition due diligence of commercial properties and for management and correction of identified hazards or deficiencies. Please visit our web site for more information: <http://www.masekconsulting.net>

Consultant Background

The inspection and sampling portions of the survey and professional aspects of the report preparation were performed by Mr. F. Stephen Masek, author of the book Illustrated Practical Asbestos: For Consultants, Contractors, Property Managers & Regulators published in 2021. Mr. Masek has performed thousands of environmental inspections in all types of buildings. Mr. Masek has been a California Certified Asbestos Consultant since the certification program started in 1992, and has been an asbestos consultant since 1990. Mr. Masek became a California certified lead Inspector / Risk Assessor, Number 751, in 1993. He has extensive experience in related environmental services. He obtained a B.S.B.A. degree from Washington University in St. Louis (1980). He is a member of Mensa, the high IQ society. As an active member of ASTM, he has contributed to the revisions to the ASTM Phase I Environmental Site Assessment Standard, was chairman of an asbestos survey task group, and helped write portions of the ASTM Property Condition Assessment standard. He has written numerous magazine articles and has spoken at local, state, and national conventions. He also provides expert witness services.

Sincerely,
Masek Consulting Services, Inc.



F. Stephen Masek
President

California Certified Asbestos Consultant #92-0822, expires November 19 every year

E-Mail: stephenmasek@masekconsulting.net

Sketch and Laboratory Report Attachments

The attachments are important parts of this report.

The chain of custody form(s) is/are part of the laboratory report(s), and is/are one of the pages counted in the report(s).

Avoiding laboratory bias is done by minimizing the information provided to the laboratory. Therefore, we do not give information to the laboratory about which samples are or are not homogeneous, where they were collected, the full address of the building, and the name of the owner, as such information could be the cause of laboratory bias.

A sketch follows. We generally omit the prefix of the sample numbers from the sketch(es) or drawings for clarity. Such prefixes are used solely to prevent the laboratory from accidentally mixing samples from different batches.

The five page asbestos laboratory report, number 10064959, prepared by Scientific Analytical Institute, Inc. follows.



Bulk Asbestos Analysis

By Polarized Light Microscopy
EPA Method: 600/R-93/116 and
40 CFR, Part 763, Subpart E, App.E



Customer: Masek Consulting Services, Inc.
23478 Sandstone
Mission Viejo, CA 92692

Attn: Stephen Masek

Lab Order ID: 10064959

Analysis: PLM

Date Received: 10/10/2024

Date Reported: 10/15/2024

Project: 800 Baker

Sample ID	Description	Asbestos	Fibrous Components	Non-Fibrous Components	Attributes
Lab Sample ID	Lab Notes				Treatment
800-1		None Detected		100% Other	White
10064959_0001					Non-Fibrous Homogeneous Dissolved
800-2		None Detected		100% Other	Gray
10064959_0002					Non-Fibrous Homogeneous Dissolved
800-3		None Detected		100% Other	White
10064959_0003					Non-Fibrous Homogeneous Dissolved
800-4		None Detected		100% Other	White
10064959_0004					Non-Fibrous Homogeneous Dissolved
800-5		None Detected		100% Other	White
10064959_0005					Non-Fibrous Homogeneous Dissolved
800-6		None Detected		100% Other	White
10064959_0006					Non-Fibrous Homogeneous Dissolved
800-7		None Detected		100% Other	Gray
10064959_0007					Non-Fibrous Homogeneous Dissolved
800-8		None Detected		100% Other	White
10064959_0008					Non-Fibrous Homogeneous Dissolved

Disclaimer: Due to the nature of the EPA 600 method, asbestos may not be detected in samples containing low levels of asbestos. We strongly recommend that analysis of floor tiles, vermiculite, and/or heterogenous soil samples be conducted by TEM for confirmation of "None Detected" by PLM. This report relates only to the samples tested and may not be reproduced, except in full, without the written approval of SAI. This report may not be used by the client to claim product endorsement by NVLAP or any other agency of the U.S. government. Analytical uncertainty available upon request. Scientific Analytical Institute participates in the NVLAP Proficiency Testing program. Unless otherwise noted blank sample correction was not performed. Estimated MDL is 0.1%.

Patrick Yarnell (28)

Analyst

Nathaniel Durham

Approved Signatory



Bulk Asbestos Analysis

By Polarized Light Microscopy
EPA Method: 600/R-93/116 and
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Date Reported: 10/15/2024

Project: 800 Baker

Sample ID	Description	Asbestos	Fibrous Components	Non-Fibrous Components	Attributes
Lab Sample ID	Lab Notes				Treatment
800-9		None Detected		100% Other	White
10064959_0009					Non-Fibrous Homogeneous Dissolved
800-10		None Detected		100% Other	White
10064959_0010					Non-Fibrous Homogeneous Dissolved
800-11		None Detected		100% Other	Gray
10064959_0011					Non-Fibrous Homogeneous Dissolved
800-12		None Detected		100% Other	White
10064959_0012					Non-Fibrous Homogeneous Dissolved
800-13		<1% Chrysotile		100% Other	White
10064959_0013					Fibrous Homogeneous Dissolved
800-14		<1% Chrysotile		100% Other	Gray
10064959_0014					Fibrous Homogeneous Dissolved
800-15		<1% Chrysotile		100% Other	Tan
10064959_0015					Fibrous Homogeneous Dissolved
800-16		None Detected		100% Other	Gray
10064959_0016					Non-Fibrous Homogeneous Dissolved

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Patrick Yarnell (28)

Analyst

Nathaniel J. Durham

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Bulk Asbestos Analysis

By Polarized Light Microscopy
EPA Method: 600/R-93/116 and
40 CFR, Part 763, Subpart E, App.E



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Lab Order ID: 10064959

Analysis: PLM

Date Received: 10/10/2024

Date Reported: 10/15/2024

Project: 800 Baker

Sample ID	Description	Asbestos	Fibrous Components	Non-Fibrous Components	Attributes
Lab Sample ID	Lab Notes				Treatment
800-17		None Detected		100% Other	Tan
10064959_0017					Non-Fibrous Homogeneous Dissolved
800-18		None Detected		100% Other	White
10064959_0018					Non-Fibrous Homogeneous Dissolved
800-19		None Detected	10% Synthetic Fibers	80% Other 10% Quartz	Black
10064959_0019					Fibrous Homogeneous Ashed
800-20		None Detected	99% Cellulose	1% Other	Tan
10064959_0020					Fibrous Homogeneous Teased
800-21		None Detected	10% Synthetic Fibers	80% Other 10% Quartz	Black
10064959_0021					Fibrous Heterogeneous Dissolved
800-22		None Detected	99% Cellulose	1% Other	Tan
10064959_0022					Fibrous Homogeneous Teased
800-23		<1% Chrysotile		100% Other	Tan
10064959_0023					Fibrous Homogeneous Dissolved
800-24		None Detected		100% Other	Gray
10064959_0024					Non-Fibrous Homogeneous Dissolved

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Patrick Yarnell (28)

Analyst

Nathaniel J. Durham

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Bulk Asbestos Analysis

By Polarized Light Microscopy
EPA Method: 600/R-93/116 and
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Attn: Stephen Masek

Lab Order ID: 10064959

Analysis: PLM

Date Received: 10/10/2024

Date Reported: 10/15/2024

Project: 800 Baker

Sample ID	Description	Asbestos	Fibrous Components	Non-Fibrous Components	Attributes
Lab Sample ID	Lab Notes				Treatment
800-25		None Detected		100% Other	Gray, Black Non-Fibrous Homogeneous
10064959_0025					Ashed
800-26		None Detected		100% Other	Gray, Black Non-Fibrous Homogeneous
10064959_0026					Ashed
800-27		None Detected		100% Other	Black Non-Fibrous Homogeneous
10064959_0027					Dissolved
800-28		None Detected		100% Other	Black Non-Fibrous Homogeneous
10064959_0028					Dissolved

Disclaimer: Due to the nature of the EPA 600 method, asbestos may not be detected in samples containing low levels of asbestos. We strongly recommend that analysis of floor tiles, vermiculite, and/or heterogeneous soil samples be conducted by TEM for confirmation of "None Detected" by PLM. This report relates only to the samples tested and may not be reproduced, except in full, without the written approval of SAI. This report may not be used by the client to claim product endorsement by NVLAP or any other agency of the U.S. government. Analytical uncertainty available upon request. Scientific Analytical Institute participates in the NVLAP Proficiency Testing program. Unless otherwise noted blank sample correction was not performed. Estimated MDL is 0.1%.

Patrick Yarnell (28)

Analyst

Approved Signatory

10064959

Chain Of Custody To: Scientific Analytical Institute, Inc. 4604 Dundas Drive, Greensboro, NC 27407 SAI Fed-Ex: 2800 3394-4	From: Masek Consulting Services, Inc. 23478 Sandstone St. Mission Viejo, CA 92692 Phone: (949) 581-8503 • http://www.masekconsulting.net SAI Client ID : MCS01
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Project Name: 800 Baker

Enclosed are 28 samples

Numbered 800-1 to 800-28

First positive Stop on the following samples: N/A

☒ PLM ☐ TEM(AHERA / LEVEL II / bulk) ☐ Lead (1 ☒ wipe)

☐ Other: _____

Turnaround (from the day & hour the samples are received at the lab to the day and hour we receive the complete **final** report with **all** signatures):

☒ 3 Day ☐ 48 Hour ☐ 24 Hour ☐ 12 hour ☐ 6 hour

Only analyze the numbered materials listed on the sample bags.

**E-mail the results with the countersigned chain of custody to
stephenmasek@masekconsulting.net**

Samples collected and relinquished by F. Stephen Masek:

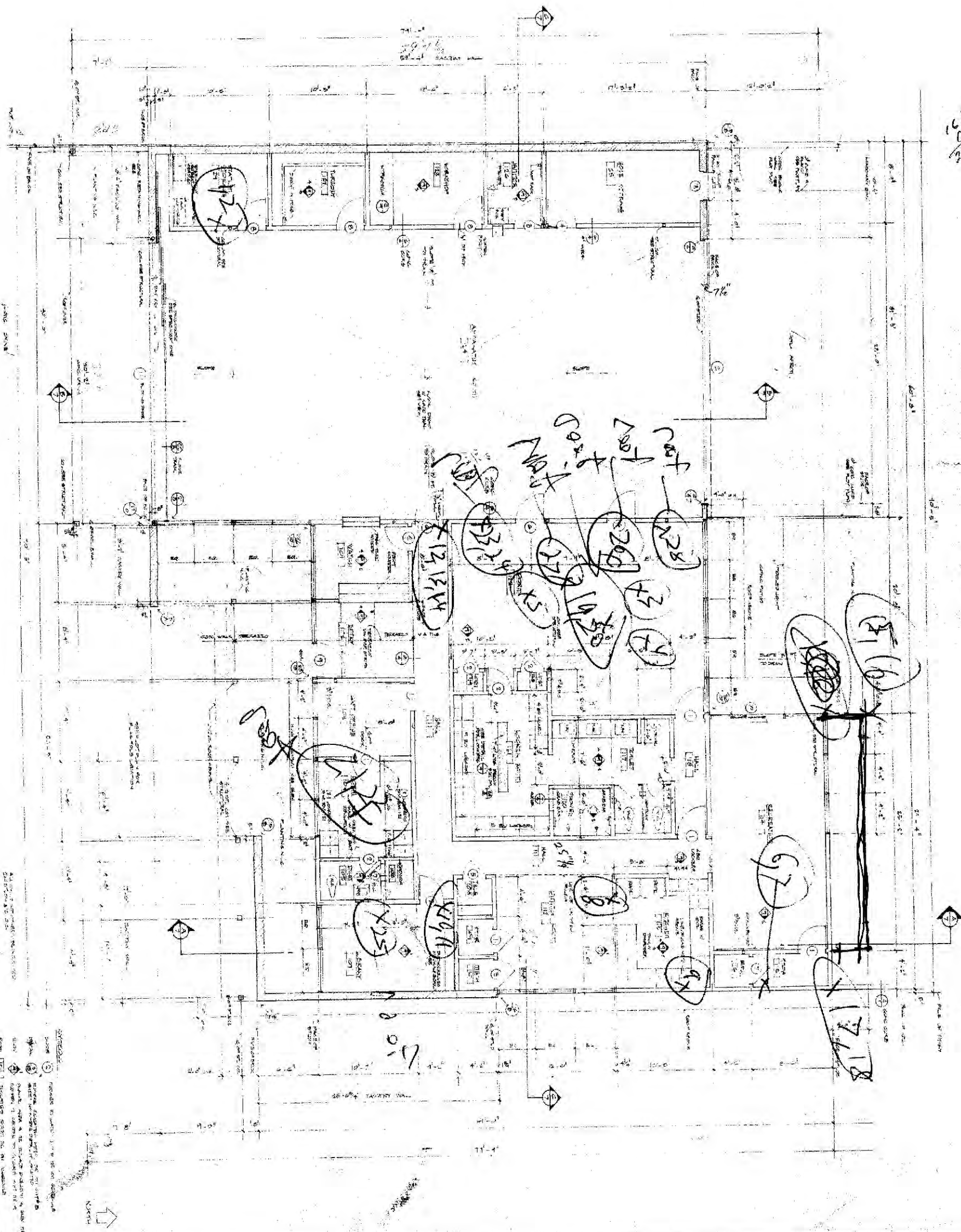
Date: 10/9/24 Signature: F. Stephen Masek

Lab - Received:

Date: 10/10 Name: _____ Signature: [Signature]

Accepted ☒
Rejected ☐

105
123
228



SCHWABER, DESATOFF & HENDERSON AIA
1800 AVENUE 57 SUITE 304 P.O. BOX 626 COSTA MESA CA 92626

COSTA MESA FIRE STATION NO. 2
FOR THE CITY OF COSTA MESA
COSTA MESA, CALIF.

TITLE OF DRAWING			
FLOOR PLAN			
SCALE: 1/8" = 1'-0"	REVISIONS	APPROVED BY	DATE
1. COSTA MESA FIRE STATION NO. 2		SCHWABER, DESATOFF & HENDERSON	10/1/81
2. COSTA MESA FIRE STATION NO. 2		SCHWABER, DESATOFF & HENDERSON	10/1/81
3. COSTA MESA FIRE STATION NO. 2		SCHWABER, DESATOFF & HENDERSON	10/1/81
4. COSTA MESA FIRE STATION NO. 2		SCHWABER, DESATOFF & HENDERSON	10/1/81
5. COSTA MESA FIRE STATION NO. 2		SCHWABER, DESATOFF & HENDERSON	10/1/81
6. COSTA MESA FIRE STATION NO. 2		SCHWABER, DESATOFF & HENDERSON	10/1/81
7. COSTA MESA FIRE STATION NO. 2		SCHWABER, DESATOFF & HENDERSON	10/1/81
8. COSTA MESA FIRE STATION NO. 2		SCHWABER, DESATOFF & HENDERSON	10/1/81
9. COSTA MESA FIRE STATION NO. 2		SCHWABER, DESATOFF & HENDERSON	10/1/81
10. COSTA MESA FIRE STATION NO. 2		SCHWABER, DESATOFF & HENDERSON	10/1/81

A-3