Appendix B. Asbestos-Containing Materials and Lead-Containing Materials Survey Report

ASBESTOS-CONTAINING MATERIALS AND LEAD-CONTAINING MATERIALS SURVEY REPORT

SUBJECT PROPERTY:

COMMERCIAL PROPERTY
777 WEST ORANGETHORPE AVENUE
PLACENTIA, CALIFORNIA 90065

PREPARED FOR:

ORANGETHORPE INVESTMENT PARTNERS, LLC
ATTN: MR. DENNIS BUCCOLA
2881 EAST LA CRESTA AVENUE
ANAHEIM, CALIFORNIA 92806

PREPARED BY:

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PROJECT NO. 092878-AS, XRF

SURVEY DATE: JUNE 3 & JUNE 10, 2021

REPORT DATE: JUNE 18, 2021

TABLE OF CONTENTS

ATTACHMENTS

1.0 EXECUTIVE SUMMARY

At the request of Mr. Dennis Buccola with Orangethorpe Investment Partners, LLC (Client), Titan Environmental Solutions, Inc. (TES) conducted an asbestos and lead-containing materials survey of the commercial building located at 777 West Orangethorpe Avenue, Placentia, California 90065 (herein referred to as the Subject Property). The survey was limited to the interior and exterior materials of the Subject Property.

The following summarizes the sampling and findings:

Asbestos

- TES collected eighty-eight (88) bulk samples of suspect Asbestos Containing Materials / Asbestos Containing Construction Materials (ACMs/ACCMs) representing twenty-five (25) identified homogenous areas in the survey area of the Subject Property, which were analyzed for asbestos content via Polarized Light Microscopy (PLM) visual estimation method.
- The asbestos survey was performed in accordance with EPA's "Method for the Determination of Asbestos in Bulk Building Materials" (EPA 600-R-93-116) and South Coast Air Quality Management District's (SCAQMD) Rule 1403.
- In accordance to 40 CFR Section 61.141 and US EPA Applicability Determination Index Control Number: C112, 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 materials asbestos-containing material, or (2) require verification of the amount by point counting. If a result obtained by point count is different from a result obtained by visual estimation, the point count result will be used.
- Point count analysis was not included in the contract, therefore in lieu of point counting, all materials surveyed containing less than one percent or "trace" amounts of asbestos are assumed to be asbestos-containing and must be managed as ACM/PACM.
- Less than one percent materials assumed to be ACM/PCM are available for further point count analysis at an additional laboratory analysis cost to the client for up to thirty (30) days from the completion and submittal date of this report.
- Asbestos was detected or assumed to be present in the following samples collected in the survey area.

Table 1-1

Identified ACMs

Sample No.	Sample Locations	Material Description	Class.	Material Location(s)*	Friable/ Non Friable	Condition (G, D, SD)	Approximate Quantity*	Analytical Results	NESHAP/ SCAQMD Cat.
0603-02-08 0603-02-09 0603-02-10	E End Women's Locker Room Ceiling S End Women's Locker Room Ceiling S End 2nd Floor Offices Ceiling	White Acoustic	Surf.	2nd Floor Offices, Showroom and Women's Locker Room	F	G	4,000 SF	3% Chrysotile	RACM FACM

Table 1-1

Identified ACMs

Sample No.	Sample Locations	Material Description	Class.	Material Location(s)*	Friable/ Non Friable	Condition (G, D, SD)	Approximate Quantity*	Analytical Results	NESHAP/ SCAQMD Cat.
0603-02-11 0603-02-12	Center Showroom Ceiling Center Offices Ceiling								
0603-08-28 0603-08-29 0603-08-30	W End Showroom Floor S End Showroom Floor E End Office Floor	12x12 Gray Floor Tile	Misc.	Showroom and Offices	NF	G	5,000 SF	2% Chrysotile (Mastic) None Detected (Floor Tile)	ACM Class I
0603-09-31 0603-09-32 0603-09-33	N End Service Center Floor Center Offices Floor Center Showroom Floor	Black Mastic	Misc.	Service Center, Show Room and Offices	NF	G	5,200 SF	2% Chrysotile (Mastic) None Detected (Floor Tile)	ACM Class I
0603-18-64 0603-18-65 0603-18-66 0603-18-67 0603-18-68 0603-18-69 0603-18-70	SE End Exterior Wall S End Exterior Wall SW End Exterior Wall W End Exterior Wall NW End Exterior Wall N End Exterior Wall NE End Exterior Wall	Gray Stucco	Misc.	Exterior	NF	G	15,000 SF	<1% Chrysotile	ACM Class I
0610-04-10 0610-04-11 0610-04-12	E End Exterior Roof Center Exterior Penetration W end Exterior Penetration	Gray Roof Penetration Mastic	Misc.	Exterior Roof Penetrations	NF	G	5,000 SF	5% Chrysotile	ACM Class I
0610-05-13 0610-05-14 0610-05-15	S End Exterior HVAC Duct S End Exterior HVAC Duct S End Exterior HVAC Duct	Gray HVAC Duct Mastic	Misc.	Exterior HVAC Ducts	NF	G	3,000 SF	5% Chrysotile	ACM Class I
N/A	Roof (Restroom and Attic)	Transite Pipe	Misc.	Roof	NF	G	4 LF	Assumed Asbestos	ACM Class I

Legend:

N = North, E = East, W = West, S = South, SF = Square Feet, LF = Linear Feet, ND = None Detected
Classification (Class.): Misc. = Miscellaneous, Surf. = Surfacing, TSI = Thermal System Insulation
Condition: G = Good, D = Damaged, SD = Significantly Damaged
Categories (Cat.):

- Cal/OSAHA: ACCM = Asbestos-Containing Construction Materials, ACM = Asbestos-Containing Materials,

Table 1-1

Identified ACMs

Sample No.	Sample Locations	Material Description	Class.	Material Location(s)*	Friable/ Non Friable	Condition (G, D, SD)	Approximate Quantity*	Analytical Results	NESHAP/ SCAQMD Cat.

- NESHAP: Cat I = Category I Non-friable ACM, Cat II = Category II Non-friable ACM, RACM = Regulated Asbestos Containing Material
- SCAQMD: Class I = Class I Non-friable ACM, Class II = Class II Non-friable ACM, FACM = Friable Asbestos Containing Material

* Locations and quantities are estimates based on accessible materials located in the survey area only. Additional locations and quantities may be present at the Subject Property.

**In accordance to 40 CFR Section 61.141 and US EPA Applicability Determination Index Control Number: C112, 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 materials asbestos-containing material, or (2) require verification of the amount by point counting. If a result obtained by point count is different from a result obtained by visual estimation, the point count result will be used.

Please note the Certified Asbestos Consultant will assume any material that is <1% analyzed via PLM and not verified by point count as an Asbestos Containing Material (ACM).

Lead

- TES performed X-Ray Fluorescence (XRF) Analyzer testing of fifty (50) surfaces painted/coated with suspect lead-based paints and/or lead-containing materials (LBPs/LCMs) in the survey area of the Subject Property.
- No LCMs or LBPs were identified in the survey area.

ASBESTOS-CONTAINING BUILDING MATERIALS

TES has the following recommendations based on the findings of the asbestos-containing building materials survey:

- A California licensed and DOSH/Cal-OSHA registered asbestos abatement contractor should be contracted to remove/abate ACMs/ACCMs and materials containing asbestos that are damaged or will be disturbed.
- A DOSH/Cal-OSHA Certified Asbestos Consultant should be contracted to conduct monitoring and clearance of any removal/abatement of ACMs/ACCMs and materials containing asbestos.
- Any materials that have not been identified in this report should be considered suspect ACMs/ACCMs and handled as ACM unless sampled and proven to be non-ACM by a DOSH/Cal-OSHA Certified Asbestos Consultant.
- Any ACMs/ACCMs to remain at the Subject Property should be properly managed in-place in accordance with applicable regulations via an Asbestos Operations and Maintenance (O&M) Plan designed by a DOSH/Cal-OSHA Certified Asbestos Consultant.
- All asbestos activities must be performed in accordance with all applicable federal, state and local regulations including, but not limited to those summarized in this report.

LEAD-CONTAINING MATERIALS / LEAD-BASED PAINTS

TES has the following recommendations based on the findings of the lead in paint survey:

- In accordance with Title 29, Code of Federal Regulations, Section 1926.62 (29 CFR 1926.62), any disturbance of LCM and/or LBP should be performed by lead hazard communication trained workers

using lead safe work practices that do not result in exposures above the Action Level (AL) of 30 micrograms per cubic meter of air (µg/m^3) and/or Permissible Exposure Limit (PEL) of 50 µg/m^3.

- In accordance with Resource Conservation and Recovery Act (RCRA) Title 40, Code of Federal Regulations, Section 261 (40 CFR 261) and California Department of Toxic Substance Control (DTSC) requirements, all lead containing wastes should be sampled and analyzed for total and leachable lead concentrations and disposed of accordingly based on the waste characterization analytical results.
- Any paints/coatings that have not been identified in this report should be considered presumed LBP and handled as LBP unless sampled and proven to be non-LBP by a CDPH Certified Lead Inspector/Assessor.
- All lead activities must be performed in accordance with all applicable federal, state and local regulations, including but not limited to those summarized in this report.

2.0 INTRODUCTION

At the request of Mr. Dennis Buccola with Orangethorpe Investment Partners, LLC (Client), Titan Environmental Solutions, Inc. (TES) conducted an asbestos and lead-containing materials survey of the commercial building located at 777 West Orangethorpe Avenue, Placentia, California 90065 (herein referred to as the Subject Property). The asbestos and lead-containing materials survey was conducted on June 3rd and 10th, 2021 and included materials sample collection and inventory of suspect asbestos-containing building materials (ACM) and/or asbestos containing construction materials (ACCM) and suspect lead-based paint and/or lead containing materials (LBP/LCMs).

The survey was performed by the following qualified staff:

- Mr. Peter Barela, California Department of Occupational Safety and Health (DOSH/Cal-OSHA) Certified Site Surveillance Technician (CSST No. 17-6032) and CDPH Certified Lead Sampling Technician (CDPH No. LRC-00000588).

The survey was performed under the direction of the following qualified staff:

- Mr. Robert Menald, DOSH/Cal-OSHA Certified Asbestos Consultant (CAC No. 08-4323) and CDPH Certified Lead Inspector/Assessor and Project Monitor (CDPH No. LRC-00005259 and LRC-00005260).

- Mr. Ibrahim M. Sobeih, DOSH/Cal-OSHA Certified Asbestos Consultant (CAC No. 06-4078) and TES Certified Industrial Hygienist in the Comprehensive Practice by the American Board of Industrial Hygiene (ABIH Certificate No. 5628CP).

3.0 BUILDING / LOCATION DESCRIPTION

The Commercial Property is located at 777 West Orangethorpe Avenue, Placentia, California 90065. The property contains a building that was built in 1986 and is approximately 35,073 square feet in size. The building is constructed with Concrete Masonry Units (CMU) block walls over a concrete on grade slab foundation. The building has a combination of wood and metal structural framing. The roof is comprised of composite rolled roofing materials. The exterior walls were finished with a combination of tucco materials and CMU materials; the interior walls and ceilings are a combination of drywall, spray-applied acoustic texture materials, and 2'x4' lay-in ceiling tile materials in a commercial suspension grid system; the floors were finished with a combination of carpet, resilient vinyl floor tile, or were unfinished concrete.

4.0 SURVEY PURPOSE AND SCOPE

4.1 SURVEY PURPOSE

The purpose of the survey was to:

- Conduct a survey in the Project Area to identify friable and non-friable asbestos containing materials (ACM) and/or asbestos containing construction materials (ACCM) for the purpose of demolition/renovation and to document the material types, locations, asbestos content, friability and approximate total quantities of surveyed materials; and

- Conduct a survey to determine if surfaces/materials scheduled for disturbance are painted/coated with LBP/LCM.

The survey did not include destructive investigation methods to identify or sample concealed materials (i.e. within wall cavities, pipe chases, encased in concrete, etc.), nor did it include dismantling to identify or sample inaccessible materials (i.e. gaskets, packings, etc.).

4.2 SURVEY SCOPE

The survey scope of work was limited to the areas and building materials identified by the Client that are scheduled for disturbance (herein referred to as the survey area). The survey area included the interior and exterior of the commercial building.

- Collect bulk samples of suspect ACMs for demolition/renovation surveys in accordance with the National Emissions Standard for Hazardous Air Pollutants (NESHAP) and South Coast Air Quality Management District (SCAQMD) Rule 1403 protocol for sample collection for demolition/renovation surveys and submit to an accredited laboratory for analysis. Analyze asbestos bulk samples using polarized light microscopy (PLM) visual estimation in accordance with EPA's July 1993 method (EPA 600/R-93/116) for the determination of asbestos in bulk building materials.

- Conduct a survey for LBPs/LCMs using an X-Ray Fluorescence (XRF) paint analyzer to screen materials suspected of being coated with LBPs and/or LCMs

- Submit written report including analytical results, regulatory requirements, conclusions and recommendations.

The survey did not include destructive investigation methods to identify or sample concealed materials (i.e. within wall cavities, pipe chases, encased in concrete, etc.) nor did it include dismantling equipment to identify or sample inaccessible materials (i.e. gaskets, packings, etc.).

5.0 ASBESTOS SAMPLING METHODOLOGY AND REGULATIONS

5.1 ASBESTOS SURVEY AND ANALYTICAL LABORATORY

The asbestos survey was conducted in accordance with NESHAP pre-renovation/demolition standards. The asbestos survey consisted of two (2) primary field activities [(1) visual inspection of the survey area and (2) representative bulk sampling of suspect asbestos containing materials], laboratory sample analysis, and preparation of a survey report.

TES typically conducts surveys in teams of two (2), one (1) person documenting the proceedings of the survey, the other performing bulk sampling and other miscellaneous activities. Small surveys are often surveyed by one (1) individual. The team performs a preliminary visual inspection of the survey area to identify and quantify suspect ACM/ACCM. A sampling strategy is then developed to provide representative sampling.

Asbestos Inspection
The visual inspection included the following activities: (1) identifying homogenous areas of suspect ACM, (2) determining friability and classification [surfacing = material that is spray or trowel applied, thermal system insulation (TSI) = material used to prevent heat gain/loss or condensation, or miscellaneous = material that is not surfacing or TSI] of each homogenous area of suspect ACM, (3) assessing the condition of each homogenous area of suspect ACM, and (4) quantifying each homogenous area of suspect ACM.

Visual inspection and physical handling is performed for all suspect materials to ensure proper friability classification, condition and potential damage - materials are assessed for any damage by impact, water, aging, deterioration, or delaminating from their substrata.

Once assessments are made, the material is assigned a hazard rating based on material condition and potential for damage. These conditions are defined in AHERA as follows:

- **Good Condition**: Material with no visible damage, deterioration, or showing only very limited damage or deterioration.

- **Damaged**: The surface is crumbling, blistered, water stained, gouged, marred or otherwise abraded over less than one-tenth of the surface if the damage is evenly distributed; or less than one quarter if the damage is localized. Accumulation of powder, dust, or debris similar in appearance to the suspect material on surfaces beneath the material can be used as confirmatory evidence.
- **Significantly Damaged**: The surface is crumbling or blistered over at least one-tenth of the surface if the damage is evenly distributed or at least one quarter if the damage is localized; and water stains, gouges or mars over at least one-tenth of the surface if the damage is evenly distributed or at least one quarter if the damage is localized. Accumulation of powder, dust, or debris similar in appearance to the suspect material on surfaces beneath the material can be used as confirmatory evidence.

Asbestos Sampling

The bulk sampling included the following activities: (1) developing a representative sampling plan for each homogenous area of suspect ACM based on the classification and estimated quantity, and (2) collecting representative bulk samples of each homogenous area of suspect ACM in the survey area at the Subject Property as identified by the Client. Efforts are made to obtain the samples from inconspicuous areas. Each sample is placed in a plastic or metal container. The container is sealed, labeled and placed in a larger storage bag.

Throughout the process, care is taken to prevent cross-contamination of the collected samples. Sampling equipment is cleaned after each sample is obtained. In addition, sample containers are placed directly beneath each sample location, when feasible, to collect any materials which may become dislodged during the sampling process. Any debris generated by the sampling is cleaned by wet-cleaning methods.

Asbestos Sample Analysis

Upon completion of the bulk sampling activities, the samples were submitted to an accredited laboratory by the National Institute for Standards and Technology (NIST) under the National Voluntary Laboratory Accreditation Program (NVLAP), under proper Chain-of-Custody (COC) documentation. Bulk sample analyses was conducted by Polarized Light Microscopy (PLM) with dispersion staining as described in the "Method for the Determination of Asbestos in Bulk Building Materials," Method EPA-600/R-93/116 (July 1993, Part 1). A sample is immersed in a solution of known refractive index and subjected to illumination by polarized light.

TES collected eighty-eight (88) bulk samples of suspect ACM/ACCMs representing twenty-five (25) homogenous areas from the survey area of the Subject Property, which were analyzed for asbestos content via Polarized Light Microscopy (PLM) visual estimation by AmeriSci Los Angeles located in Carson, California. AmeriSci Richmond is accredited by the National Institute for Standards and Technology (NIST) under the National Voluntary Laboratory Accreditation Program (NVLAP Lab Code 200346-0).

5.2 ASBESTOS REGULATORY DEFINITIONS AND STANDARDS

Asbestos Regulatory Definitions

The Environmental Protection Agency (EPA) defines asbestos-containing material (ACM) as follows:

- **ACM** is defined by EPA as any material containing more than one percent (>1%) asbestos as determined using the method specified in Appendix E, Subpart E, 40 CFR Part 763, Section 1, Polarized Light Microscopy (PLM). In order to verify a material with detected concentrations of asbestos is not an ACM, the EPA requires PLM point count analysis to confirm the asbestos concentration is <1.0%.
- **Friable ACM** as defined by the EPA, means material containing more than one percent (>1%) as determined by PLM that when dry, may be crumbled, pulverized, or reduced to powder by hand pressure, and includes previously non-friable material after such previously non-friable material becomes damaged to the extent that when dry it may be crumbled, pulverized, or reduced to powder by hand pressure.
- **Non-friable ACM** as defined by the EPA, means material containing more than one percent (>1%) as determined by PLM that when dry, may NOT be crumbled, pulverized, or reduced to powder by hand pressure. NESHAP further defines two (2) categories of non-friable ACM:
    - **Category I (Cat I) - Category I Non-friable ACM** is any asbestos-containing packing, gasket, resilient floor covering, mastic or asphalt roofing product which contains more than one percent (>1%) asbestos as determined using PLM according to the method specified in Appendix E, Subpart E, 40 CFR Part 763.
    - **Category II (Cat II) - Category II Non-friable ACM** is any material, excluding Category I non-friable ACM, containing more than one percent (>1%) asbestos as determined using PLM according to the methods specified in Appendix E, Subpart E, 40 CFR Part 763 that, when dry, cannot be crumbled, pulverized, or reduced to powder by hand pressure.
    - **Regulated Asbestos-Containing Material (RACM)** is defined by NESHAP as Friable ACM, Category I Non-friable ACM that has become friable, Category I Non-friable ACM that will be or has been subjected to sanding, grinding, cutting or abrading, or Category II Non-friable ACM that has a high probability of becoming or has a high probability of becoming or has become crumbled, pulverized, or reduced to powder by the forces expected to act on the material in the course of demolition or renovation operations.

South Coast Air Quality Management District (SCAQMD)

- **Class I Non-friable ACM** is defined by South Coast Air Quality Management District (SCAQMD) and Antelope Valley Air Quality Management District (AVAQMD) as material containing more than one percent (>1%) asbestos as determined by PLM, and that, when dry, can be broken, crumbled, pulverized, or reduced to powder in the course of demolition or renovation activities. Actions which may cause material to be broken, crumbled, pulverized, or reduced to powder include physical wear and disturbance by mechanical force, such as, but not limited to, sanding, sandblasting, cutting or abrading, improper handling or removal or leaching of matrix binders. Class I non-friable asbestos-containing material includes, but is not limited to, fractured or crushed asbestos cement products, transite materials, mastic, roofing felts, roofing tiles, cement water pipes and resilient floor covering.
- **Class II Non-friable ACM** is defined by South Coast and Antelope Valley Air Quality Management Districts as all other material containing more than one percent (>1%) asbestos as determined by PLM, that is neither friable nor Class I non-friable.

- **Friable Asbestos-Containing Material (FACM)** is defined by South Coast Air Quality Management District (SCAQMD) in Rule 1403 as a material containing more than one percent (1%) asbestos, that, when dry, can be crumbled, pulverized, or reduced to powder by hand pressure.

Federal Occupational Safety and Health Administration (OSHA) and the California Division of Occupational Safety and Health (DOSH/Cal-OSHA) Classes of Asbestos Work as codified in 29 CFR 1926.1101 and 8 CCR 1529, respectively:

- **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 no thermal system insulation or surfacing materials. This includes, but is not limited to, the removal of asbestos-containing wallboard, floor tile and sheeting, roofing and siding shingles, and construction mastics / adhesives.
- **Class III** Asbestos work means repair and maintenance operations, where "ACM", including TSI and surfacing ACM and PACM, is likely to be disturbed.
- **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 Federal Occupational Safety and Health Administration (OSHA) and the California Division of Occupational Safety and Health (DOSH/Cal-OSHA) use the following definitions for materials containing asbestos:

- **ACM** is defined by OSHA and DOSH/Cal-OSHA as any material containing more than one percent (>1%) asbestos.
- **Asbestos-containing construction material (ACCM)** is defined by DOSH/Cal-OSHA as any manufactured construction material containing greater than one tenth of one percent (>0.1%) asbestos.
- **Material Containing Asbestos**, OSHA and DOSH/Cal-OSHA regulate materials containing any detectable concentrations of asbestos.

Asbestos Regulatory Standards Summary

NESHAP, OSHA, DOSH/Cal-OSHA, the California Department of Toxic Substance Control (DTSC) and local air quality/pollution control districts regulate the removal, disturbance and disposal of asbestos in California. The following is a brief list of these, not all, applicable regulatory standards:

- **Cat I and II/Class I and II Non-Friable ACM (>1% asbestos)**:
  - NESHAP and local air quality/pollution control districts require the abatement/removal of ACM, both friable and non-friable in California, prior to renovation or demolition activities which would disturb them. The abatement/removal must be performed in accordance with the local air quality/pollution control district regulatory standard, including containment and notification as applicable.

- DOSH/Cal-OSHA requires abatement/removal of ACM to be performed by a California licensed and DOSH/Cal-OSHA registered asbestos abatement contractor using work practices in accordance with the standards prescribed in 8 CCR Section 1529.
- Federal OSHA requires abatement/removal of ACM to be performed in accordance with the standards prescribed in 29 CFR Section 1926.1101.
- DTSC requires disposal of non-friable ACM that remains substantially intact as a Non-Friable/Non-Hazardous Asbestos Waste in California.

- **Friable ACM/RACM (friable, >1% asbestos)**:
  - NESHAP and local air quality/pollution control districts require the abatement/removal of ACM, both friable and non-friable in California, prior to renovation or demolition activities which would disturb them. The abatement/removal must be performed in accordance with the local air quality/pollution control district regulatory standard, including containment and notification as applicable.
  - DOSH/Cal-OSHA requires abatement/removal of ACM to be performed by a California licensed and DOSH/Cal-OSHA registered asbestos abatement contractor using work practices in accordance with the standards prescribed in 8 CCR Section 1529.
  - Federal OSHA requires abatement/removal of ACM to be performed in accordance with the standards prescribed in 29 CFR Section 1926.1101.
  - DTSC requires disposal of friable ACM as a Friable/Hazardous Asbestos Waste in California.

- **ACCM (>0.1% asbestos)**:
  - DOSH/Cal-OSHA requires disturbance/removal of ACCM to be performed using properly trained workers and special work practices in accordance with the standards prescribed in 8 CCR Section 1529.
  - DOSH/Cal-OSHA requires a “report of use” for disturbance/removal of ACCM (8 CCR Section 5203) and further requires a DOSH/Cal-OSHA registered contractor for disturbance/removal of 100 square feet or more of ACCM (California Labor Code 6500-6510).

- **Material containing asbestos (<0.1% asbestos)**:
  - OSHA and DOSH/Cal-OSHA requires disturbance/removal of materials containing asbestos to be performed using properly trained workers and special work practices in accordance with the standards prescribed in 29 CFR Section 1926.1101 and 8 CCR Section 1529.

6.0 LEAD SAMPLING METHODOLOGY AND REGULATIONS

6.1 LEAD SURVEY AND ANALYTICAL LABORATORY

The lead-containing materials survey was conducted in accordance with applicable standards including, but not necessarily limited to the following: HUD Guidelines and EPA requirements under TSCA Section 403 (24 CFR Part 35 and 40 CFR Part 745 respectively). The lead-containing materials survey was limited to materials/areas scheduled for disturbance within the survey area, as identified by the Client.

The lead-containing materials survey consisted of two (2) primary field activities [(1) visual inspection of the survey area and (2) representative testing/sampling of suspect LBP/LCM], as well as preparation of a survey report. TES typically conducts larger surveys in teams of two (2), one (1) person documenting the proceedings of the survey, the other performing the testing/sampling and other miscellaneous activities. Small surveys are often surveyed by one (1) individual.

Lead Paint Inspection

The lead paint inspection included the following activities: (1) identifying homogenous testing combinations (similar room equivalent, component and substrate) of suspect LBP/LCM and (2) assessing the condition of each homogenous area of suspect LBP/LCM.

Once assessments are made, the paint is assigned a condition. These conditions are defined as follows:

- **Intact**: Paint with no visible deterioration or damage.
- **Deteriorated**: Paint that is cracking, chalking, flaking, chipping, peeling, non-intact, failed, or otherwise separating from a component.

Lead Paint Testing/Sampling

The lead paint testing/sampling included the following activities: (1) developing a representative testing/sampling plan for each homogenous area of suspect LBP/LCM and (2) conducting representative X-ray fluorescence (XRF) testing of each homogenous area of suspect LBP/LCM.

In every "room equivalent" within the survey area, one (1) representative surface of each "testing combination" was tested. Commonly encountered interior components tested, if painted or varnished, include but are not necessarily limited to the following: walls, baseboards, doors, door trim, door jambs, windows trim, window sashes, and window sills. Commonly encountered exterior components tested, if painted or varnished, include but are not necessarily limited to the following: walls, fascia, trim, doors, door trim, door jambs, window assemblies and window wells.

XRF Analysis

A hand-held RMD LPA-1 XRF unit was used to determine the presence of lead in painted surface(s). An appropriate number of XRF reading(s) were collected from the survey area. Multiple readings are recorded to resolve inconsistencies in the XRF reading(s). XRF reading(s) were recorded and data-logged using the "Quick Mode" option. No time setting is required with this option since the LPA-1 automatically adjusts its reading(s) time to the different paint substrates for precision. The duration of each test result was determined by the substrate density in combination with the age of the radioactive sources of the LPA-1 and the actual reading relative to the "LBP" level or "threshold" chosen. The testing combination includes a unique combination of room equivalent, building component and substrate.

XRF INSTRUMENT SPECIFICATIONS

Instrument Manufacturer:	Radiation Monitoring Devices, Inc. (RMD)
Model:	LPA-1
Serial Number:	3642

Modes of Operation:	Quick Mode for Inspection, Time Corrected Mode for Calibrations
Radioactive Source:	^{57}Cobalt
Age of Radioactive Source:	Assayed August 1, 2017
Calibration Standard:	NIST Standard Reference Material of Red Paint Film with 1.02 mg/cm^2 content

The RMD LPA-1 Spectrum Analyzer uses a ^{57}Co radioactive source and an advanced, solid-state, room temperature, radiation detector to generate and detect the x-ray fluorescence spectrum of a painted surface. The spectrum is then analyzed by a microprocessor to eliminate the effects of substrate and other factors such as scattering to allow an accurate determination of the amount of lead on a surface. Since the RMD LPA-1 is a Spectrum Analyzer, it can reject the signal from X-rays of unwanted energy. Although lead atoms emit X-rays at a unique energy, some gamma-rays emitted from the ^{57}Co "scatter" or bounce off the painted surface and into the LPA-1 XRF detector, and some of these rays have an energy very close to that of lead K-X-rays. The intensity of scattered gamma-rays depends on the nature of the substrate under the paint. In order to compensate for this scatter, the LPA-1 XRF detector measures the intensities of X-rays and gamma-rays at many energies and computes a correction for substrate. Accordingly, the analysis of the energy spectrum allows for a definitive reading, 95% confidence level, that is displayed on the instrument which accounts for substrate effects. The XRF reading(s) are expressed in milligrams lead per square centimeter of surface area (mg/cm^2).

XRF INSTRUMENT CALIBRATION CHECKS

The calibration of the RMD LPA-1 is performed in accordance with of the HUD/EPA developed Performance Characteristic Sheet (PCS) Edition 5 for this instrument. Field calibration checks were performed prior, during and after each lead inspection to ensure the device functioning optimally within acceptable limits determined by the manufacturer. The Standard Reference Material (SRM) red paint film of 1.02 mg/cm^2, developed by the National Institute of Standards and Technology (NIST), is the calibration standard. The LPA-1 instrument is calibrated to the NIST standard with a minimum of three (3) calibration reading(s) in the "30-Second Equivalent Standard" mode performed before and after each inspection to ensure manufacturer's standards are met as indicated below. For inspection extending more than four (4) hours, additional calibration check reading(s) are made every four (4) hours. Each set of calibration checks is averaged and compared to the PCS calibration check "30-Second Equivalent Standard" limit for the LPA-1 in the PCS.

If for any reason the instruments are not maintaining a consistent calibration reading within the manufacturer's standards for performance on the calibration SRM supplied by the manufacturer, manufacturer's recommendations are used to bring the instrument into calibration. If the instrument cannot be brought back into calibration it is taken off the site and sent back to the manufacturer for repair and/or re-calibration.

XRF TESTING OF PAINTED SURFACE(S)

The XRF testing procedures followed during this inspection are in accordance with HUD Guidelines and EPA requirements under TSCA Section 403 (24 CFR Part 35 and 40 CFR Part 745 respectively). Testing of the painted surface(s) was patterned after the inspection protocol of Chapter 7-Lead-Based Paint Inspection of the HUD Guidelines, Revised 2012. In every "room equivalent" within the tested property, one (1) representative surface of each "testing combination" was tested. Commonly encountered interior components tested, if painted or varnished, included walls, baseboards, doors, door trim, jambs, windows assemblies, and trim, including

sashes, and window sills. Commonly encountered exterior components tested, if painted or varnished, included the walls, fascia, doors and assemblies, and window assemblies and window wells.

A hand-held RMD LPA-1 XRF unit was used to determine the presence of lead in painted surface(s) throughout the structure. An appropriate number of XRF reading(s) were collected from the survey area. Multiple readings are recorded to resolve inconsistencies in the XRF reading(s). XRF reading(s) were recorded and data-logged using the "Quick Mode" option. No time setting is required with this option since the LPA-1 automatically adjusts its reading(s) time to the different paint substrates for precision. The duration of each test result was determined by the substrate density in combination with the age of the radioactive sources of the LPA-1 and the actual reading relative to the "abatement" level or "threshold" chosen. The testing combination includes a unique combination of room equivalent, building component and substrate.

XRF Lead Sampling

TES performed X-Ray Fluorescence (XRF) Analyzer testing of fifty (50) surfaces painted/coated with suspect lead-based paints and/or lead-containing materials (LBPs/LCMs) in the survey area of the Subject Property preceded and followed by instrument calibration.

6.2 LEAD REGULATORY DEFINITIONS AND STANDARDS

Lead Regulatory Definitions

The following is a list of some of regulatory definitions associated with lead paint:

- **Lead Based Paints/Coatings (LBP)** is defined by the United States Department of Housing and Urban Development (HUD) and the California Department of Public Health (CDPH) as paints/coatings that contain an amount of lead equal to, or in excess of 1.0 mg/cm^2, 5,000 parts per million (ppm) or 0.5% by weight.
- **Lead Abatement** is defined by HUD and CDPH as any set of measures designed to reduce or eliminate lead hazards or lead-based paint permanently or for a minimum of 20 years for public and residential buildings but does not include containment or cleaning.
- **Lead Related Construction Work** is defined by CDPH as any construction, alteration, painting, demolition, salvage, renovation, repair, or maintenance of any residential or public building, including preparation and cleanup that, by using or disturbing lead-containing material or soil, may result in significant exposures of adults or children to lead.
- **Lead Hazardous Waste:** Lead waste streams are characterized by analyzing total lead content and soluble lead content and comparing it to California Title 22 Total Threshold Limit Concentrations of 1000 ppm and Solubility Threshold Limit Concentration of 5 mg/L, respectively. If any of these two (2) limits are equaled or exceeded, then the lead waste stream is classified as California Hazardous Waste and must be packaged and disposed in Class I or Class II landfills. Furthermore, the lead waste stream is tested for soluble lead in accordance with USPA Resource Conservation and Recovery Act (RCRA) Toxicity Characteristic Leachate Procedure (TCLP) of 5 mg/L. If the TCLP is equaled or exceeded, the lead waste stream is classified as RCRA Waste.

Lead Regulatory Standards Summary

At present there is no state or federal regulation requiring mandatory lead removal or abatement prior to disturbance of building materials with identified lead paint or coatings. However, there are applicable Cal/OSHA worker protection and training requirements, Cal/EPA waste disposal requirements, CDPH requirements for public and residential buildings, and SB 460 lead hazard regulations that apply to lead-related construction activities, abatement activities and the associated lead wastes. The following is a brief discussion and summary of applicable regulatory requirements:

♦ **Cal/OSHA:** Title 8, California Code of Regulation (CCR), Section 1532.1 (8 CCR 1532.1) governs occupational exposure to lead. This regulation requires that prior to initiation of certain activities, referred to as "trigger tasks", workers must be trained, medically evaluated, and properly fitted with respiratory protection, and protective clothing until statistically reliable personal eight-hour time weighted average (TWA) results indicate lead exposure levels below the Personal Exposure Limit (PEL) for each unique task which disturbs lead-based and lead-containing coatings. This process is known as a Negative Exposure Assessment or NEA.

If the result of the exposure assessment is above the Action Level (AL) additional monitoring is required and if the result is above the PEL additional exposure monitoring, worker protection (including respirator protection and PPE), training and medical requirements apply. However even where the NEA criteria is met, certain hazard communication training and work practice controls still apply where lead is disturbed. "Trigger tasks" are tasks that are assumed to exceed the PEL pending an exposure assessment and they encompass the majority of construction activities that disturb surface coatings.

Examples of "trigger" tasks range from manual paint scraping as a lower expected exposure up to hot work and abrasive blasting as the highest expected exposures, and include any non-listed task that the employer determines may potentially expose employees to lead levels above the AL.

"OSHA does not consider any method that relies solely on the analysis of bulk materials or surface content of lead (or other toxic material) to be acceptable for safely predicting employee exposure to airborne contaminants. Without air monitoring results or without the benefit of historical or objective data (including air sampling which clearly demonstrates that the employee cannot be exposed above the action level during any process, operation, or activity) the analysis of bulk or surface samples cannot be used to determine employee exposure."- OSHA Standard Interpretation May 8, 2000.

OSHA states that these rules apply to "any detectable concentration of lead" without a specified detection level. Due to the Consumer Product Safety Commission currently allowing paint to contain up to 90 parts per million (ppm) or 0.009 wt% of lead, the variation of lead content due to aging and weathering, and the variation of detection limits associated with analysis of bulk materials, such as paint chips and surface content analysis via XRF, it is recommended that all painted or coated surfaces be treated as potentially containing lead.

Positive analytical results by either method can be used to indicate that detectable lead is present but negative results cannot be interpreted as conclusively demonstrating the absence of lead. Analytical data from analysis of bulk materials or surface content of lead can be helpful in evaluation of lead-related environmental risks in

general but cannot be used to calculate worker exposures and are not a substitute for employee exposure monitoring.

As a result of the above, any employee that works around potential lead-based or lead-containing coatings must have HAZCOM training and personal exposure air monitoring is additionally required for employees that disturb such coatings. Additional certification, notification, and work practices are required for materials found to be lead-based paint.

Any welding, cutting or heating of metal surfaces containing surface coatings should be conducted in accordance with 29 CFR 1926.354 and 8 CCR 1537 and/or 1536. These regulations require surfaces covered with toxic preservatives, and in enclosed areas, be stripped of all toxic coatings for a distance of at least 4 inches, in all directions, from the area of heat application prior to the initiation of such heat application with adequate exhaust ventilation.

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

♦ **Cal/EPA**: The Department of Toxic Substance Control (DTSC) regulates disposal of lead hazardous waste (22 CCR Division 4.5, Minimum Standards for Management of Hazardous and Extremely Hazardous Wastes). DTSC has issued guidance indicating that architectural debris with intact lead paint is normally expected to be handled as general construction waste. However, waste stream segregation and analysis is still required for all lead painted or coated debris regardless of if the paint or coating is intact on a building component or not. The resulting wastes may be hazardous under California and federal RCRA standards for lead and therefore require proper handling, packaging, labeling, and transportation under a proper manifest to a permitted hazardous waste storage, treatment and disposal facility.

♦ **CDPH**: The Department of Public Health (CDPH) has specific requirements (Title 17 Sections 35001 thru 36100 et. al.) for hazard assessment and work in public and residential structures in regard to lead-based paint. These regulations require special certifications, work practices, and notification for such activities. CDPH regulations rely on the HUD Guidelines 2012 Edition as the methods utilized in the inspection, risk assessment and abatement of LBP.

♦ **Senate Bill 460 (SB 460)**: An act to amend Section 1941.1 of the Civil Code, and to amend Sections 17961, 17980, and 124130 of, and to add Sections 17920.10, 105251, 105252, 105253, 105254, 105255, 105256, and 105257 to, the Health and Safety Code, relating to lead abatement. This bill allows for fines and criminal penalties to be levied by local code enforcement agencies on any person who is found to have performed lead abatement without containment or created a measurable "lead hazard" based upon current CDPH standards. A "lead hazard" means deteriorated lead-based paint, lead contaminated dust, lead contaminated soil, disturbing lead-based paint or presumed lead-based paint without containment, or any other nuisance which may result in persistent and quantifiable lead exposure.

TES recommends that all parties who come into contact with paint or soil that have detectable lead concentrations follow all applicable federal, state and local regulations relating to employee health and safety and proper disposal of generated wastes.

7.0 SUSPECT ACM/ACCM SAMPLING ANALYTICAL RESULTS

7.1 ASBESTOS ANALYTICAL RESULTS SUMMARY

The following Table 7-1 provides a summary of suspect ACM/ACCM samples analytical results.

Table 7-1
Asbestos Sampling PLM Analytical Results

Sample No.	Sample Locations	Material Description	Class.	Material Location(s)*	Friable/ Non Friable	Condition (G, D, SD)	Approximate Quantity*	Analytical Results	NESHAP/ SCAQMD Cat.
0603-01-01	W Wall Men's Restroom	White Drywall and Joint Compound	Misc.	Throughout Building	NF	G	5,000 SF	None Detected	Non-ACM
0603-01-02	W Wall Service Center								
0603-01-03	S Wall Service Center								
0603-01-04	N Wall 2nd Floor Offices								
0603-01-05	E Wall Warehouse								
0603-01-06	N Wall Showroom								
0603-01-07	N Wall Office #1								
0603-02-08	E End Women's Locker Room Ceiling	White Acoustic	Surf.	2nd Floor Offices, Showroom and Women's Locker Room	F	G	4,000 SF	3% Chrysotile	RACM FACM
0603-02-09	S End Women's Locker Room Ceiling								
0603-02-10	S End 2nd Floor Offices Ceiling								
0603-02-11	Center Showroom Ceiling								
0603-02-12	Center Offices Ceiling								

Table 7-1

Asbestos Sampling PLM Analytical Results

Sample No.	Sample Locations	Material Description	Class.	Material Location(s)*	Friable/ Non Friable	Condition (G, D, SD)	Approximate Quantity*	Analytical Results	NESHAP/ SCAQMD Cat.
0603-03-13 0603-03-14 0603-03-15	N End Safe Room Floor S End Safe Room Floor N End Server Room Floor	Beige Vinyl Flooring	Misc.	Safe Room and Server Room	NF	G	150 SF	None Detected	Non-ACM
0603-04-16 0603-04-17 0603-04-18	S End 2nd Floor Ceiling S End 2nd Floor Ceiling S End 2nd Floor Ceiling	Yellow HVAC Duct Insulation (Above Ceiling Tiles)	Misc.	2nd Floor Offices	NF	G	100 LF	None Detected	Non-ACM
0603-05-19 0603-05-20 0603-05-21	S End Floor W End Floor N End Floor	Tan Carpet Glue	Misc.	2nd Floor Offices	NF	G	1,800 SF	None Detected	Non-ACM
0603-06-22 0603-06-23 0603-06-24	Center 2nd Floor Office Ceiling Center Showroom Ceiling Center Service Center Ceiling	2x4 White Ceiling Tile	Misc.	2nd Floor Offices, Showroom and Service Center	NF	G	2,500 SF	None Detected	Non-ACM
0603-07-25 0603-07-26 0603-07-27	N End Service Center Floor S End Service Center Floor Center Showroom Floor	12x12 Black Floor Tile	Misc.	Service Center and Showroom	NF	G	250 SF	None Detected	Non-ACM
0603-08-28 0603-08-29 0603-08-30	W End Showroom Floor S End Showroom Floor E End Office Floor	12x12 Gray Floor Tile	Misc.	Showroom and Offices	NF	G	5,000 SF	2% Chrysotile (Mastic) None Detected (Floor Tile)	ACM Class I
0603-09-31 0603-09-32 0603-09-33	N End Service Center Floor Center Offices Floor Center Showroom Floor	Black Mastic	Misc.	Service Center, Show Room and Offices	NF	G	5,200 SF	2% Chrysotile (Mastic) None Detected (Floor Tile)	ACM Class I

Table 7-1

Asbestos Sampling PLM Analytical Results

Sample No.	Sample Locations	Material Description	Class.	Material Location(s)*	Friable/ Non Friable	Condition (G, D, SD)	Approximate Quantity*	Analytical Results	NESHAP/ SCAQMD Cat.
0603-10-34	S End Showroom Floor	Tan Mastic	Misc.	Showroom and Offices	NF	G	1,000 SF	None Detected	Non-ACM
0603-10-35	W End Showroom Floor								
0603-10-36	N End Showroom Floor								
0603-11-37	N Wall 2nd Floor	Brown Cove Base	Misc.	2nd Floor Offices	NF	G	250 LF	None Detected	Non-ACM
0603-11-38	W Wall 2nd Floor								
0603-11-39	S Wall 2nd Floor								
0603-12-40	E Wall Warehouse	Black Cove Base	Misc.	Throughout Building	NF	G	1,000 LF	None Detected	Non-ACM
0603-12-41	E Wall Showroom								
0603-12-42	W Wall Service Center								
0603-13-43	E Wall Showroom	White Cove Base Adhesive	Misc.	Throughout Building	NF	G	1,250 LF	None Detected	Non-ACM
0603-13-44	W Wall Service Center								
0603-13-45	N Wall 2nd Floor Office								
0603-14-46	S Wall Warehouse	Gray CMU Block	Misc.	Throughout Building	NF	G	15,000 SF	None Detected	Non-ACM
0603-14-47	S Wall Storage								
0603-14-48	N Wall Maintenance								
0603-15-49	S Wall Warehouse	Gray CMU Mortar	Misc.	Throughout Building	NF	G	15,000 SF	None Detected	Non-ACM
0603-15-50	S Wall Storage								
0603-15-51	N Wall Maintenance								
0603-15-52	E Wall Maintenance								
0603-15-53	S Wall Service Center								
0603-16-54	N End Warehouse Floor	Gray Concrete	Misc.	Throughout Property	NF	G	>10,000 SF	None Detected	Non-ACM
0603-16-55	Center Maintenance Floor								
0603-16-56	Center Warehouse Floor								
0603-16-57	S End Parking Lot Floor								
0603-16-58	W End Parking Lot Floor								

Table 7-1

Asbestos Sampling PLM Analytical Results

Sample No.	Sample Locations	Material Description	Class.	Material Location(s)*	Friable/ Non Friable	Condition (G, D, SD)	Approximate Quantity*	Analytical Results	NESHAP/ SCAQMD Cat.
0603-17-59	S End Parking Lot Floor	Black Asphalt	Misc.	Throughout Property (Exterior)	NF	G	>10,000 SF	None Detected	Non-ACM
0603-17-60	S End Parking Lot Floor								
0603-17-61	W End Parking Lot Floor								
0603-17-62	W End Parking Lot Floor								
0603-17-63	W End Parking Lot Floor								
0603-18-64	SE End Exterior Wall	Gray Stucco	Misc.	Exterior	NF	G	15,000 SF	<1% Chrysotile	ACM Class I
0603-18-65	S End Exterior Wall								
0603-18-66	SW End Exterior Wall								
0603-18-67	W End Exterior Wall								
0603-18-68	NW End Exterior Wall								
0603-18-69	N End Exterior Wall								
0603-18-70	NE End Exterior Wall								
0610-01-01	W End Exterior Roof	Black Roofing Material	Misc.	Exterior Roof	NF	G	>10,000 SF	None Detected	Non-ACM
0610-01-02	Center Exterior Roof								
0610-01-03	E End Exterior Roof								
0610-02-04	W End Exterior Roof	Black Roof Felt	Misc.	Exterior Roof	NF	G	>10,000 SF	None Detected	Non-ACM
0610-02-05	Center Exterior Roof								
0610-02-06	E End Exterior Roof								
0610-03-07	W Wall Exterior Parapet	Black Roofing Material (Parapet Wall)	Misc.	Exterior Roof	NF	G	5,000 SF	None Detected	Non-ACM
0610-03-08	N Wall Exterior Parapet								
0610-03-09	E Wall Exterior Parapet								
0610-04-10	E End Exterior Roof	Gray Roof Penetration Mastic	Misc.	Exterior Roof Penetrations	NF	G	5,000 SF	5% Chrysotile	ACM Class I
0610-04-11	Center Exterior Penetration								
0610-04-12	W end Exterior Penetration								
0610-05-13	S End Exterior HVAC Duct	Gray HVAC Duct Mastic	Misc.	Exterior HVAC Ducts	NF	G	3,000 SF	5% Chrysotile	ACM Class I
0610-05-14	S End Exterior HVAC Duct								
0610-05-15	S End Exterior HVAC Duct								

Table 7-1

Asbestos Sampling PLM Analytical Results

Sample No.	Sample Locations	Material Description	Class.	Material Location(s)*	Friable/ Non Friable	Condition (G, D, SD)	Approximate Quantity*	Analytical Results	NESHAP/ SCAQMD Cat.
0610-06-16 0610-06-17 0610-06-18	S End Exterior HVAC Duct E End Exterior HVAC Duct W End Exterior HVAC Duct	Tan HVAC Seam Tape	Misc.	Exterior Roof HVAC Units	NF	G	1,000 SF	None Detected	Non-ACM
N/A	Roof (Restroom and Attic)	Transite Pipe	Misc.	Roof	NF	G	4 LF	Assumed Asbestos	ACM Class I

Legend:

N = North, E = East, W = West, S = South, SF = Square Feet, LF = Linear Feet, ND = None Detected
Classification (Class.): Misc. = Miscellaneous, Surf. = Surfacing, TSI = Thermal System Insulation
Condition: G = Good, D = Damaged, SD = Significantly Damaged
Categories (Cat.):

- Cal/OSAHA: ACCM = Asbestos Containing Construction Materials, ACM = Asbestos Containing Materials,
- NESHAP: Cat I = Category I Non-friable ACM, Cat II = Category II Non-friable ACM, RACM = Regulated Asbestos Containing Material
- SCAQMD: Class I = Class I Non-friable ACM, Class II = Class II Non-friable ACM, FACM = Friable Asbestos Containing Material

* Locations and quantities are estimates based on accessible materials located in the survey area only. Additional locations and quantities may be present at the Subject Property.

**In accordance to 40 CFR Section 61.141 and US EPA Applicability Determination Index Control Number: C112, 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 materials asbestos-containing material, or (2) require verification of the amount by point counting. If a result obtained by point count is different from a result obtained by visual estimation, the point count result will be used.

Please note the Certified Asbestos Consultant will assume any material that is <1% analyzed via PLM and not verified by point count as an Asbestos Containing Material (ACM).

Please note that the laboratory may dispose of all samples after a thirty (30) calendar day period. Any additional analysis must be requested within thirty (30) days by the Client.

7.2 SUSPECT ACMS/ACCMS NOT SAMPLED

The suspect ACMs/ACCMs listed below may be present at the Subject Property and due to the non-destructive nature of this survey were not sampled in order to avoid (1) hazardous conditions, (2) impacting the integrity of the structure, (3) damaging building materials and finishes that cannot be easily repaired, (4) damaging equipment and/or mechanical systems, (5) voiding warranties, and/or (6) creating hazards including, but not limited to, an asbestos fiber release episode. If any of the following materials are identified at the Subject Property, these materials should be considered ACMs unless a DOSH/Cal-OSHA CAC determines they are not asbestos containing.

- Cement asbestos/transite materials including, but not limited to:
  - Cement flues and pipes
  - Cement panels and siding
  - Cement roofing
  - Transite countertops and hoods
- Ceramic tile with underlayment and grout

- Electrical wire insulation
- Fire doors
- Gaskets, ropes, packings and brake shoes/pads associated with equipment (furnaces, ovens, elevator equipment, etc.)
- Inaccessible and/or concealed materials including, but not limited to:
  - Glues
  - Leveling compounds
  - Mastics
  - Underlayment

7.3 NON-SUSPECT ACMS/ACCMS

The non-suspect ACMs/ACCMs listed below may be present at the Subject Property and were not sampled because they were determined to be non-suspect by a DOSH/Cal-OSHA CAC.

- Fiberglass: insulation, etc.;
- Glass: windows, doors, mirrors, etc.;
- Laminate/faux wood: flooring, wall covering, etc.;
- Metal materials/finishes: door and window framing, ducting, etc.;
- Terrazzo: flooring, wall covering, etc.; and
- Wood materials/finishes: flooring, wall paneling, framing, etc.

8.0 SUSPECT LCM/LBP SAMPLING ANALYTICAL RESULTS

The following Table 8-1 provides a summary of the lead paint XRF results.

Table 8-1
Lead Paint XRF Readings

Reading	Room	Side[1]	Structure	Condition[2]	Substrate	Color	Reading (mg/cm^2)	Classification[3]
1	Calibration						0.7	
2	Calibration						0.7	
3	Calibration						0.8	
4	Maintenance Shop	E	Wall	I	CMU	Blue	-0.3	BDL
5	Maintenance Shop	N	Roll up Door	I	Metal	Beige	-0.2	BDL
6	Maintenance Shop	W	Conduit	I	Metal	Blue	-0.1	BDL
7	Maintenance Shop	S	Door	I	Metal	Blue	-0.3	BDL
8	Maintenance Shop	S	Door Frame	I	Metal	Blue	-0.2	BDL
9	Maintenance Shop	E	Floor	I	Concrete	Yellow	-0.8	BDL
10	Maintenance Bathroom	W	Wall	I	Drywall	Gray	-0.2	BDL
11	Maintenance Bathroom	E	Door	I	Wood	Blue	-0.3	BDL

Table 8-1
Lead Paint XRF Readings

Reading	Room	Side[1]	Structure	Condition[2]	Substrate	Color	Reading (mg/cm^2)	Classification[3]
12	Maintenance Bathroom	E	Door Frame	I	Wood	Blue	-0.2	BDL
13	Service Center	W	Wall	I	Drywall	White	-0.2	BDL
14	Service Center	W	Door	I	Wood	White	-0.1	BDL
15	Service Center	W	Door Frame	I	Wood	White	-0.3	BDL
16	Warehouse	S	Wall	I	CMU	White	-0.2	BDL
17	Warehouse	S	Door	I	Metal	White	-0.2	BDL
18	Warehouse	S	Door Frame	I	Metal	White	-0.1	BDL
19	Warehouse	W	Stairwell	I	Metal	White	-0.5	BDL
20	Women's Locker Room	N	Wall	I	Drywall	Gray	-0.2	BDL
21	Women's Locker Room	W	Wall	I	Ceramic	Gray	-0.7	BDL
22	Women's Locker Room	N	Door	I	Wood	Blue	-0.1	BDL
23	Women's Locker Room	N	Door Frame	I	Wood	Blue	-0.3	BDL
24	Women's Locker Room	E	Ceiling	I	Acoustic	White	-0.2	BDL
25	Showroom	N	Wall	I	Drywall	Gray	-0.2	BDL
26	Showroom	E	Door	I	Wood	Gray	-0.3	BDL
27	Showroom	E	Door Frame	I	Wood	Gray	-0.1	BDL
28	Men's Room	W	Wall	I	Drywall	White	-0.3	BDL
29	Men's Room	W	Wall	I	Ceramic	Beige	-0.5	BDL
30	Men's Room	E	Floor	I	Ceramic	Beige	-0.3	BDL
31	Men's Room	S	Door	I	Wood	White	-0.2	BDL
32	Men's Room	S	Door Frame	I	Wood	White	-0.1	BDL
33	Women's Room	W	Wall	I	Drywall	Beige	-0.2	BDL
34	Women's Room	W	Wall	I	Ceramic	Beige	-0.4	BDL
35	Women's Room	S	Door	I	Wood	White	-0.4	BDL
36	Women's Room	S	Door Frame	I	Wood	White	-0.2	BDL
37	Women's Room	E	Floor	I	Ceramic	Beige	-0.5	BDL
38	2nd Floor - Office	S	Wall	I	Drywall	White	-0.1	BDL
39	2nd Floor - Office	E	Door	I	Wood	White	-0.3	BDL
40	2nd Floor - Office	E	Door Frame	I	Wood	White	-0.2	BDL
41	2nd Floor - Office	W	Ceiling	I	Acoustic	White	-0.2	BDL
42	Exterior of Building	W	Wall	I	Stucco	Beige	-0.4	BDL
43	Exterior of Building	S	Eaves	I	Wood	Beige	0.0	BDL
44	Exterior of Building	N	Column	I	Metal	Beige	-0.2	BDL
45	Exterior of Building	W	Handrail	I	Metal	Black	-0.6	BDL
46	Exterior of Building	W	Roof Drain	I	Metal	Beige	-0.3	BDL
47	Exterior of Building	W	Rollup Door	I	Metal	Beige	-0.4	BDL
48	Calibration						0.8	

Table 8-1
Lead Paint XRF Readings

Reading	Room	Side[1]	Structure	Condition[2]	Substrate	Color	Reading (mg/cm^2)	Classification[3]
49	Calibration						0.9	
50	Calibration						0.7	
1	Calibration						0.7	
2	Calibration						0.7	
3	Calibration						0.7	
4	Roof	S	Stairwell Door	I	Metal	White	-0.2	BDL
5	Roof	S	Door Frame	I	Wood	White	-0.3	BDL
6	Roof	E	Stairwell Wall	I	Wood	Yellow	-0.5	BDL
7	Roof	N	HVAC Duct	I	Metal	Silver	-0.4	BDL
8	Roof	W	HVAC Unit	I	Metal	Chrome	-0.1	BDL
9	Roof	S	Conduit	I	Metal	Chrome	-0.2	BDL
10	Calibration						0.8	
11	Calibration						0.9	
12	Calibration						0.7	

Legend:
mg/cm^2 = milligrams per centimeter squared
1 Side: N = North, E = East, W = West, S = South, C = Center
2 Paint Condition: I = Intact, D = Deteriorated
3 Classification:
BDL = Below the XRF's detection level; less than 0.1 mg/cm^2.
LCM = Lead Containing Materials; equal to or exceeding 0.1 mg/cm^2.
LBP = Lead-Based Paints; equal to or exceeding 1.0 mg/cm^2
* Paint conditions are based on visual observations in survey area. Different conditions may be present in other areas of the Subject Property.

9.0 RECOMMENDATIONS

TES conducted asbestos and lead-containing materials survey at the Subject Property on May 6th and 7th, 2021. The following is a summary of the recommendations.

ASBESTOS-CONTAINING BUILDING MATERIALS

TES has the following recommendations based on the findings of the asbestos-containing building materials survey:

- The asbestos survey was performed in accordance with EPA's "Method for the Determination of Asbestos in Bulk Building Materials" (EPA 600-R-93-116) and South Coast Air Quality Management District's (SCAQMD) Rule 1403.
- In accordance to 40 CFR Section 61.141 and US EPA Applicability Determination Index Control Number: C112, 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 materials asbestos-containing material,

or (2) require verification of the amount by point counting. If a result obtained by point count is different from a result obtained by visual estimation, the point count result will be used.

- Point count analysis was not included in the contract, therefore in lieu of point counting, all materials surveyed containing less than one percent or "trace" amounts of asbestos are assumed to be asbestos-containing and must be managed as ACM/PACM.
- Less than one percent materials assumed to be ACM/PCM are available for further point count analysis at an additional laboratory analysis cost to the client for up to thirty (30) days from the completion and submittal date of this report.
- A California licensed and DOSH/Cal-OSHA registered asbestos abatement contractor should be contracted to remove/abate ACMs/ACCMs and materials containing asbestos that are damaged or will be disturbed.
- A DOSH/Cal-OSHA Certified Asbestos Consultant should be contracted to conduct monitoring and clearance of any removal/abatement of ACMs/ACCMs and materials containing asbestos.
- Any materials that have not been identified in this report should be considered suspect ACMs/ACCMs and handled as ACM unless sampled and proven to be non-ACM by a DOSH/Cal-OSHA Certified Asbestos Consultant.
- All asbestos activities must be performed in accordance with all applicable federal, state and local regulations including, but not limited to those summarized in this report.

LEAD-CONTAINING MATERIALS / LEAD-BASED PAINTS

TES has the following recommendations based on the findings of the lead in paint survey:

- In accordance with Title 29, Code of Federal Regulations, Section 1926.62 (29 CFR 1926.62), any disturbance of LCM and/or LBP should be performed by lead hazard communication trained workers using lead safe work practices that do not result in exposures above the Action Level (AL) of 30 micrograms per cubic meter of air (µg/m^3) and/or Permissible Exposure Limit (PEL) of 50 µg/m^3.
- In accordance with Resource Conservation and Recovery Act (RCRA) Title 40, Code of Federal Regulations, Section 261 (40 CFR 261) and California Department of Toxic Substance Control (DTSC) requirements, all lead containing wastes should be sampled and analyzed for total and leachable lead concentrations and disposed of accordingly based on the waste characterization analytical results.
- Any paints/coatings that have not been identified in this report should be considered presumed LBP and handled as LBP unless sampled and proven to be non-LBP by a CDPH Certified Lead Inspector/Assessor.
- All lead activities must be performed in accordance with all applicable federal, state and local regulations, including but not limited to those summarized in this report.

10.0 CERTIFICATION

This sampling, including preparation of this report, was conducted under the direction of Mr. Robert Menald, DOSH/Cal-OSHA Certified Asbestos Consultant (CAC No. 08-4323) and CDPH Certified Lead Inspector/Assessor and Project Monitor (CDPH No. 14353), and Mr. Ibrahim M. Sobeih, DOSH/Cal-OSHA Certified Asbestos Consultant (CAC No. 06-4078) and TES Certified Industrial Hygienist in the Comprehensive

Practice by the American Board of Industrial Hygiene (ABIH Certificate No. 5628CP), undersigned. If you have any questions or require any additional information or services, please contact our office toll free at (888) 948-4826.

Sincerely,

Titan Environmental Solutions, Inc.

Robert Menald, CIEC, CAC, CLI/A PM
Project Manager

Ibrahim M. Sobeih, MS, MSPH, CIH, CAC, FAIHA
Director of Industrial Hygiene and Safety

11.0 LIMITATIONS

TES is committed to providing state-of-the-art environmental consulting services that are of the highest quality. However, asbestos and lead survey work is not an exact science. The possibility of field and general conditions beyond TES control that affect our work or that present a concern for the safety of our employees, our consultants, building occupants and the public at the site, and insurance constraints, requires that we qualify the services we provide with the following limitations:

- In accordance with the client specified scope of work, this survey was limited to accessible building materials and areas at the Subject Property identified by the Client; no destructive investigation was performed. Additional suspect materials located inaccessible areas and/or outside the scope of this survey may be present at the Subject Property.
- Reasonable effort is made by TES personnel to locate and sample all suspect hazardous materials. However, for any building there is the possibility that various types of unique or concealed hazardous materials may exist undetected. In addition, sampling and laboratory analyses constraints typically hinder the investigation. TES does not warrant, guarantee or profess to have the ability to locate or identify all hazardous materials in a building.
- Confined spaces and areas determined by TES personnel to be unsafe to access, are excluded from the scope of work.
- TES is not, and has no responsibility as, a generator, operator, treater, storer, transporter or disposer of hazardous materials or waste found or identified as a result of TES work.
- TES does not guarantee or warrant that the Subject Property or workplace are safe, nor does TES involvement in this property relieve the Client, building owner/operator or tenant of any continuing responsibility of providing a safe property or workplace.
- This report was based on those conditions observed on the day(s) the field evaluation was accomplished. In the event that changes in the nature of the property have occurred, or additional relevant information about the property is subsequently discovered, the findings and

recommendations contained in this report may not be valid unless these changes and additional relevant information are reviewed and the conclusion of this report is modified and verified in writing.

- It is understood that the survey is a non-destructive assessment of potential hazardous materials and is to be used expressly for the purpose of evaluating the risk relative to the expected material disturbance at the Subject Property. Because destructive investigation has not been performed during the survey, the report may not reveal concealed hazardous materials. Subsequently, additional investigation including construction documents review and/or destructive investigation is recommended as a precaution to prevent accidental exposure when construction or demolition is planned for this Subject Property.
- It is understood that this is a modified survey and results are limited to the specific areas and materials sampled. This report is not valid for use outside of the specific areas identified by the Client or by individuals not associated with the currently planned work at the Subject Property.

ATTACHMENT I

Laboratory Analytical Report(s)

(Including Chain of Custody Forms)

AmeriSci Los Angeles
24416 S. Main Street, Ste 308
Carson, California 90745
TEL: (310) 834-4868 • FAX: (310) 834-4772

PLM Bulk Asbestos Report

Titan Environmental Solutions, Inc.
Attn: Titan Environmental
1521 E. Orangethorpe Ave.
Suite B
Fullerton, CA 92831

Date Received 06/04/21 **AmeriSci Job #** 921061214
Date Examined 06/10/21 **P.O. #**
Page 1 **of** 15

RE: 092878.AS; Commercial Property; 777 W Orangethorpe Ave, Placentia, CA 90065

Client No. / HGA	Lab No.	Asbestos Present	Total % Asbestos
0603.0603.01 -01 01	921061214-01.1 **Location:** W. Wall / Mens RR / Wall / White / Drywall / Joint Compound / Throughout Building	***No***	NAD (by CVES) by Thu M. Nguyen on 06/10/21
Analyst Description: White, Heterogeneous, Non-Fibrous, Joint Compound **Asbestos Types:** **Other Material:** Non-fibrous 100 %			
0603.0603.01 -01 01	921061214-01.2 **Location:** W. Wall / Mens RR / Wall / White / Drywall / Joint Compound / Throughout Building	***No***	NAD (by CVES) by Thu M. Nguyen on 06/10/21
Analyst Description: White/Brown, Heterogeneous, Fibrous, Drywall **Asbestos Types:** **Other Material:** Cellulose 5 %, Non-fibrous 95 %			
0603.01 -02 01	921061214-02.1 **Location:** W. Wall / Service Center / Wall / White / Drywall / Joint Compound / Throughout Building	***No***	NAD (by CVES) by Thu M. Nguyen on 06/10/21
Analyst Description: White, Heterogeneous, Non-Fibrous, Joint Compound **Asbestos Types:** **Other Material:** Non-fibrous 100 %			
0603.01 -02 01	921061214-02.2 **Location:** W. Wall / Service Center / Wall / White / Drywall / Joint Compound / Throughout Building	***No***	NAD (by CVES) by Thu M. Nguyen on 06/10/21
Analyst Description: White/Brown, Heterogeneous, Fibrous, Drywall **Asbestos Types:** **Other Material:** Cellulose 5 %, Non-fibrous 95 %			
0603.01 -03 01	921061214-03.1 **Location:** S. Wall / Service Center / Wall / White / Drywall / Joint Compound / Throughout Building	***No***	NAD (by CVES) by Thu M. Nguyen on 06/10/21
Analyst Description: White, Heterogeneous, Non-Fibrous, Joint Compound **Asbestos Types:** **Other Material:** Non-fibrous 100 %			

See Reporting notes on last page

PLM Bulk Asbestos Report

092878.AS; Commercial Property; 777 W Orangethorpe Ave, Placentia, CA 90065

Client No. / HGA	Lab No.	Asbestos Present	Total % Asbestos
0603.01 -03	921061214-03.2	*No*	NAD
01	**Location:** S. Wall / Service Center / Wall / White / Drywall / Joint Compound / Throughout Building		(by CVES) by Thu M. Nguyen on 06/10/21
Analyst Description: White/Brown, Heterogeneous, Fibrous, Drywall **Asbestos Types:** **Other Material:** Cellulose 5 %, Non-fibrous 95 %			
0603.01 -04	921061214-04.1	*No*	NAD
01	**Location:** N. Wall / 2nd Floor Offices / Wall / White / Drywall / Joint Compound / Throughout Building		(by CVES) by Thu M. Nguyen on 06/10/21
Analyst Description: White, Heterogeneous, Non-Fibrous, Joint Compound **Asbestos Types:** **Other Material:** Non-fibrous 100 %			
0603.01 -04	921061214-04.2	*No*	NAD
01	**Location:** N. Wall / 2nd Floor Offices / Wall / White / Drywall / Joint Compound / Throughout Building		(by CVES) by Thu M. Nguyen on 06/10/21
Analyst Description: White/Brown, Heterogeneous, Fibrous, Drywall **Asbestos Types:** **Other Material:** Cellulose 5 %, Non-fibrous 95 %			
0603.01 -05	921061214-05.1	*No*	NAD
01	**Location:** E. Wall / Warehouse / Wall / White / Drywall / Joint Compound / Throughout Building		(by CVES) by Thu M. Nguyen on 06/10/21
Analyst Description: White, Heterogeneous, Non-Fibrous, Joint Compound **Asbestos Types:** **Other Material:** Non-fibrous 100 %			
0603.01 -05	921061214-05.2	*No*	NAD
01	**Location:** E. Wall / Warehouse / Wall / White / Drywall / Joint Compound / Throughout Building		(by CVES) by Thu M. Nguyen on 06/10/21
Analyst Description: White/Brown, Heterogeneous, Fibrous, Drywall **Asbestos Types:** **Other Material:** Cellulose 5 %, Non-fibrous 95 %			
0603.01 -06	921061214-06.1	*No*	NAD
01	**Location:** N. Wall / Showroom / Wall / White / Drywall / Joint Compound / Throughout Building		(by CVES) by Thu M. Nguyen on 06/10/21
Analyst Description: White, Heterogeneous, Non-Fibrous, Joint Compound **Asbestos Types:** **Other Material:** Non-fibrous 100 %			

See Reporting notes on last page

PLM Bulk Asbestos Report

092878.AS; Commercial Property; 777 W Orangethorpe Ave, Placentia, CA 90065

Client No. / HGA	Lab No.	Asbestos Present	Total % Asbestos
0603.01 -06 01	921061214-06.2 **Location:** N. Wall / Showroom / Wall / White / Drywall / Joint Compound / Throughout Building	***No***	NAD (by CVES) by Thu M. Nguyen on 06/10/21
Analyst Description: White/Brown, Heterogeneous, Fibrous, Drywall **Asbestos Types:** **Other Material:** Cellulose 5 %, Non-fibrous 95 %			
0603.01 -07 01	921061214-07.1 **Location:** W. Wall / Offices / Wall / White / Drywall / Joint Compound / Throughout Building	***No***	NAD (by CVES) by Thu M. Nguyen on 06/10/21
Analyst Description: White, Heterogeneous, Non-Fibrous, Joint Compound **Asbestos Types:** **Other Material:** Non-fibrous 100 %			
0603.01 -07 01	921061214-07.2 **Location:** W. Wall / Offices / Wall / White / Drywall / Joint Compound / Throughout Building	***No***	NAD (by CVES) by Thu M. Nguyen on 06/10/21
Analyst Description: White/Brown, Heterogeneous, Fibrous, Drywall **Asbestos Types:** **Other Material:** Cellulose 5 %, Non-fibrous 95 %			
0603.02 -08 02	921061214-08 **Location:** E. End / Womens Locker Rm / Ceiling / White / Acoustic / 2nd Floor Offices, Showroom, Womens Locker Room	***Yes***	3 % (by CVES) by Thu M. Nguyen on 06/10/21
Analyst Description: White, Heterogeneous, Fibrous, Acoustic Ceiling **Asbestos Types:** Chrysotile 3.0 % **Other Material:** Non-fibrous 97 %			
0603.02 -09 02	921061214-09 **Location:** S. End / Womens Locker Room / Ceiling / White / Acoustic / 2nd Floor Offices, Showroom, Womens Locker Room		NA/PS
Analyst Description: Acoustic Ceiling **Asbestos Types:** **Other Material:**			
0603.02 -10 02	921061214-10 **Location:** S. End / 2nd Floor Offices / Ceiling / White / Acoustic / 2nd Floor Offices, Showroom, Womens Locker Room		NA/PS
Analyst Description: Acoustic Ceiling **Asbestos Types:** **Other Material:**			

See Reporting notes on last page

PLM Bulk Asbestos Report

092878.AS; Commercial Property; 777 W Orangethorpe Ave, Placentia, CA 90065

Client No. / HGA	Lab No.	Asbestos Present	Total % Asbestos
0603.02 -11 02	921061214-11 **Location:** Center / Showroom / Ceiling / White / Acoustic / 2nd Floor Offices, Showroom, Womens Locker Room		NA/PS
Analyst Description: Acoustic Ceiling **Asbestos Types:** **Other Material:**			
0603.02 -12 02	921061214-12 **Location:** Center / Offices / Ceiling / White / Acoustic / 2nd Floor Offices, Showroom, Womens Locker Room		NA/PS
Analyst Description: Acoustic Ceiling **Asbestos Types:** **Other Material:**			
0603.03 -13 03	921061214-13 **Location:** N. End / Safe Room / Floor / Beige / Vinyl Flooring / Safe Room, Server Room	***No***	NAD (by CVES) by Thu M. Nguyen on 06/10/21
Analyst Description: Tan/Beige, Heterogeneous, Fibrous, Vinyl Flooring **Asbestos Types:** **Other Material:** Cellulose 20 %, Fibrous glass 5 %, Synthetic fibers 10 %, Non-fibrous 65 %			
0603.03 -14 03	921061214-14 **Location:** S. End / Safe Room / Floor / Beige / Vinyl Flooring / Safe Room, Server Room	***No***	NAD (by CVES) by Thu M. Nguyen on 06/10/21
Analyst Description: Tan/Beige, Heterogeneous, Fibrous, Vinyl Flooring **Asbestos Types:** **Other Material:** Cellulose 20 %, Fibrous glass 5 %, Synthetic fibers 10 %, Non-fibrous 65 %			
0603.03 -15 03	921061214-15 **Location:** N. End / Server Room / Floor / Beige / Vinyl Flooring / Safe Room, Server Room	***No***	NAD (by CVES) by Thu M. Nguyen on 06/10/21
Analyst Description: Tan/Beige, Heterogeneous, Fibrous, Vinyl Flooring **Asbestos Types:** **Other Material:** Cellulose 20 %, Fibrous glass 5 %, Synthetic fibers 10 %, Non-fibrous 65 %			
0603.04 -16 04	921061214-16 **Location:** S. End / 2nd Floor / Ceiling / Yellow / HVAC Duct Insulation / 2nd Floor Offices (Above Ceiling Tiles)	***No***	NAD (by CVES) by Thu M. Nguyen on 06/10/21
Analyst Description: Yellow, Heterogeneous, Fibrous, Insulation **Asbestos Types:** **Other Material:** Fibrous glass 98 %, Non-fibrous 2 %			

See Reporting notes on last page

PLM Bulk Asbestos Report

092878.AS; Commercial Property; 777 W Orangethorpe Ave, Placentia, CA 90065

Client No. / HGA	Lab No.	Asbestos Present	Total % Asbestos
0603.04 -17 04	921061214-17 **Location:** S. End / 2nd Floor / Ceiling / Yellow / HVAC Duct Insulation / 2nd Floor Offices (Above Ceiling Tiles)	***No***	NAD (by CVES) by Thu M. Nguyen on 06/10/21
Analyst Description: Yellow, Heterogeneous, Fibrous, Insulation **Asbestos Types:** **Other Material:** Fibrous glass 98 %, Non-fibrous 2 %			
0603.04 -18 04	921061214-18 **Location:** S. End / 2nd Floor / Ceiling / Yellow / HVAC Duct Insulation / 2nd Floor Offices (Above Ceiling Tiles)	***No***	NAD (by CVES) by Thu M. Nguyen on 06/10/21
Analyst Description: Yellow, Heterogeneous, Fibrous, Insulation **Asbestos Types:** **Other Material:** Fibrous glass 98 %, Non-fibrous 2 %			
0603.05 -19 05	921061214-19 **Location:** S. End / 2nd Floor / Floor / Tan / Carpet Glue / 2nd Floor Offices	***No***	NAD (by CVES) by Thu M. Nguyen on 06/10/21
Analyst Description: Tan, Heterogeneous, Non-Fibrous, Carpet Glue **Asbestos Types:** **Other Material:** Non-fibrous 100 %			
0603.05 -20 05	921061214-20 **Location:** W. End / 2nd Floor / Floor / Tan / Carpet Glue / 2nd Floor Offices	***No***	NAD (by CVES) by Thu M. Nguyen on 06/10/21
Analyst Description: Tan, Heterogeneous, Non-Fibrous, Carpet Glue **Asbestos Types:** **Other Material:** Non-fibrous 100 %			
0603.05 -21 05	921061214-21 **Location:** N. End / 2nd Floor / Floor / Tan / Carpet Glue / 2nd Floor Offices	***No***	NAD (by CVES) by Thu M. Nguyen on 06/10/21
Analyst Description: Tan, Heterogeneous, Non-Fibrous, Carpet Glue **Asbestos Types:** **Other Material:** Non-fibrous 100 %			
0603.06 -22 06	921061214-22 **Location:** Center / 2nd Floor Offices / Ceiling / White / 2 x 4 Ceiling Tile / 2nd Floor Offices, Showroom Service Center	***No***	NAD (by CVES) by Thu M. Nguyen on 06/10/21
Analyst Description: White/Brown, Heterogeneous, Fibrous, Ceiling Tile **Asbestos Types:** **Other Material:** Cellulose 50 %, Fibrous glass 10 %, Non-fibrous 40 %			

See Reporting notes on last page

PLM Bulk Asbestos Report

092878.AS; Commercial Property; 777 W Orangethorpe Ave, Placentia, CA 90065

Client No. / HGA	Lab No.	Asbestos Present	Total % Asbestos
0603.06 -23 06	921061214-23 **Location:** Center / Showroom / Ceiling / White / 2 x 4 Ceiling Tile / 2nd Floor Offices, Showroom Service Center	***No***	NAD (by CVES) by Thu M. Nguyen on 06/10/21
Analyst Description: White/Brown, Heterogeneous, Fibrous, Ceiling Tile **Asbestos Types:** **Other Material:** Cellulose 50 %, Fibrous glass 10 %, Non-fibrous 40 %			
0603.06 -24 06	921061214-24 **Location:** Center / Sevice Center / Ceiling / White / 2 x 4 Ceiling Tile / 2nd Floor Offices, Showroom Service Center	***No***	NAD (by CVES) by Thu M. Nguyen on 06/10/21
Analyst Description: White/Brown, Heterogeneous, Fibrous, Ceiling Tile **Asbestos Types:** **Other Material:** Cellulose 50 %, Fibrous glass 10 %, Non-fibrous 40 %			
0603.07 -25 07	921061214-25.1 **Location:** N. End / Service Center / Floor / Black / 12 x 12 Floor Tile / Showroom, Service Center	***No***	NAD (by CVES) by Thu M. Nguyen on 06/10/21
Analyst Description: Black, Homogeneous, Non-Fibrous, Floor Tile **Asbestos Types:** **Other Material:** Non-fibrous 100 %			
0603.07 -25 07	921061214-25.2 **Location:** N. End / Service Center / Floor / Black / 12 x 12 Floor Tile / Showroom, Service Center	***No***	NAD (by CVES) by Thu M. Nguyen on 06/10/21
Analyst Description: Tan, Heterogeneous, Non-Fibrous, Adhesive **Asbestos Types:** **Other Material:** Non-fibrous 100 %			
0603.07 -26 07	921061214-26 **Location:** S. End / Service Center / Floor / Black / 12 x 12 Floor Tile / Showroom, Service Center	***No***	NAD (by CVES) by Thu M. Nguyen on 06/10/21
Analyst Description: Black, Homogeneous, Non-Fibrous, Floor Tile **Asbestos Types:** **Other Material:** Non-fibrous 100 %			
0603.07 -27 07	921061214-27 **Location:** Center / Showroom / Floor / Black / 12 x 12 Floor Tile / Showroom, Service Center	***No***	NAD (by CVES) by Thu M. Nguyen on 06/10/21
Analyst Description: Black, Homogeneous, Non-Fibrous, Floor Tile **Asbestos Types:** **Other Material:** Non-fibrous 100 %			

See Reporting notes on last page

PLM Bulk Asbestos Report

092878.AS; Commercial Property; 777 W Orangethorpe Ave,
Placentia, CA 90065

Client No. / HGA	Lab No.	Asbestos Present	Total % Asbestos
0603.08 -28 08	921061214-28.1 **Location:** W. End / Showroom / Floor / Gray / 12 x 12 Floor Tile / Showroom, Offices	***No***	NAD (by CVES) by Thu M. Nguyen on 06/10/21
Analyst Description: Grey, Homogeneous, Non-Fibrous, Floor Tile **Asbestos Types:** **Other Material:** Non-fibrous 100 %			
0603.08 -28 08	921061214-28.2 **Location:** W. End / Showroom / Floor / Gray / 12 x 12 Floor Tile / Showroom, Offices	***Yes***	2 % (by CVES) by Thu M. Nguyen on 06/10/21
Analyst Description: Black, Heterogeneous, Fibrous, Mastic **Asbestos Types:** Chrysotile 2.0 % **Other Material:** Non-fibrous 98 %			
0603.08 -29 08	921061214-29.1 **Location:** S. End / Showroom / Floor / Gray / 12 x 12 Floor Tile / Showroom, Offices	***No***	NAD (by CVES) by Thu M. Nguyen on 06/10/21
Analyst Description: Grey, Homogeneous, Non-Fibrous, Floor Tile **Asbestos Types:** **Other Material:** Non-fibrous 100 %			
0603.08 -29 08	921061214-29.2 **Location:** S. End / Showroom / Floor / Gray / 12 x 12 Floor Tile / Showroom, Offices		NA/PS
Analyst Description: Mastic **Asbestos Types:** **Other Material:**			
0603.08 -30 08	921061214-30.1 **Location:** E. End / Offices / Floor / Gray / 12 x 12 Floor Tile / Showroom, Offices	***No***	NAD (by CVES) by Thu M. Nguyen on 06/10/21
Analyst Description: Grey, Homogeneous, Non-Fibrous, Floor Tile **Asbestos Types:** **Other Material:** Non-fibrous 100 %			
0603.08 -30 08	921061214-30.2 **Location:** E. End / Offices / Floor / Gray / 12 x 12 Floor Tile / Showroom, Offices		NA/PS
Analyst Description: Mastic **Asbestos Types:** **Other Material:**			

See Reporting notes on last page

PLM Bulk Asbestos Report

092878.AS; Commercial Property; 777 W Orangethorpe Ave, Placentia, CA 90065

Client No. / HGA	Lab No.	Asbestos Present	Total % Asbestos
0603.09 -31 09	921061214-31 **Location:** N. End / Service Center / Floor / Black / Mastic / Service Center, Showroom, Offices	***No***	NAD (by CVES) by Thu M. Nguyen on 06/10/21
Analyst Description: Black, Heterogeneous, Non-Fibrous, Mastic **Asbestos Types:** **Other Material:** Non-fibrous 100 %			
0603.09 -32 09	921061214-32.1 **Location:** Center / Offices / Floor / Black / Mastic / Service Center, Showroom, Offices	***No***	NAD (by CVES) by Thu M. Nguyen on 06/10/21
Analyst Description: Grey, Homogeneous, Non-Fibrous, Tile **Asbestos Types:** **Other Material:** Non-fibrous 100 %			
0603.09 -32 09	921061214-32.2 **Location:** Center / Offices / Floor / Black / Mastic / Service Center, Showroom, Offices	***Yes***	2 % (by CVES) by Thu M. Nguyen on 06/10/21
Analyst Description: Black, Heterogeneous, Fibrous, Mastic **Asbestos Types:** Chrysotile 2.0 % **Other Material:** Non-fibrous 98 %			
0603.09 -33 09	921061214-33.1 **Location:** Center / Showroom / Floor / Black / Mastic / Service Center, Showroom, Offices	***No***	NAD (by CVES) by Thu M. Nguyen on 06/10/21
Analyst Description: Grey, Homogeneous, Non-Fibrous, Floor Tile **Asbestos Types:** **Other Material:** Non-fibrous 100 %			
0603.09 -33 09	921061214-33.2 **Location:** Center / Showroom / Floor / Black / Mastic / Service Center, Showroom, Offices		NA/PS
Analyst Description: Mastic **Asbestos Types:** **Other Material:**			
0603.10 -34 10	921061214-34 **Location:** S. End / Showroom / Floor / Tan / Mastic / Showroom, Offices	***No***	NAD (by CVES) by Thu M. Nguyen on 06/10/21
Analyst Description: Tan, Heterogeneous, Non-Fibrous, Mastic **Asbestos Types:** **Other Material:** Non-fibrous 100 %			

See Reporting notes on last page

PLM Bulk Asbestos Report

092878.AS; Commercial Property; 777 W Orangethorpe Ave,
Placentia, CA 90065

Client No. / HGA	Lab No.	Asbestos Present	Total % Asbestos
0603.10 -35 10	921061214-35 **Location:** W. End / Showroom / Floor / Tan / Mastic / Showroom, Offices	***No***	NAD (by CVES) by Thu M. Nguyen on 06/10/21
Analyst Description: Tan, Heterogeneous, Non-Fibrous, Mastic **Asbestos Types:** **Other Material:** Non-fibrous 100 %			
0603.10 -36 10	921061214-36 **Location:** N. End / Showroom / Floor / Tan / Mastic / Showroom, Offices	***No***	NAD (by CVES) by Thu M. Nguyen on 06/10/21
Analyst Description: Tan, Heterogeneous, Non-Fibrous, Mastic **Asbestos Types:** **Other Material:** Non-fibrous 100 %			
0603.11 -37 11	921061214-37 **Location:** N. Wall / 2nd Floor / Wall / Brown / Base Cove / 2nd Floor Offices	***No***	NAD (by CVES) by Thu M. Nguyen on 06/10/21
Analyst Description: Brown, Homogeneous, Non-Fibrous, Basecove **Asbestos Types:** **Other Material:** Non-fibrous 100 %			
0603.11 -38 11	921061214-38 **Location:** W. Wall / 2nd Floor / Wall / Brown / Base Cove / 2nd Floor Offices	***No***	NAD (by CVES) by Thu M. Nguyen on 06/11/21
Analyst Description: Brown, Homogeneous, Non-Fibrous, Basecove **Asbestos Types:** **Other Material:** Non-fibrous 100 %			
0603.11 -39 11	921061214-39 **Location:** S. Wall / 2nd Floor / Wall / Brown / Base Cove / 2nd Floor Offices	***No***	NAD (by CVES) by Thu M. Nguyen on 06/11/21
Analyst Description: Brown, Homogeneous, Non-Fibrous, Basecove **Asbestos Types:** **Other Material:** Non-fibrous 100 %			
0603.12 -40 12	921061214-40 **Location:** E. Wall / Warehouse / Wall / Black / Base Cove / Throughout Building	***No***	NAD (by CVES) by Thu M. Nguyen on 06/11/21
Analyst Description: Black, Homogeneous, Non-Fibrous, Basecove **Asbestos Types:** **Other Material:** Non-fibrous 100 %			

See Reporting notes on last page

PLM Bulk Asbestos Report

092878.AS; Commercial Property; 777 W Orangethorpe Ave, Placentia, CA 90065

Client No. / HGA	Lab No.	Asbestos Present	Total % Asbestos
0603.12 -41	921061214-41	***No***	NAD
12	**Location:** E. Wall / Showroom / Wall / Black / Base Cove / Throughout Building		(by CVES) by Thu M. Nguyen on 06/11/21
Analyst Description: Black, Homogeneous, Non-Fibrous, Basecove **Asbestos Types:** **Other Material:** Non-fibrous 100 %			
0603.12 -42	921061214-42	***No***	NAD
12	**Location:** W. Wall / Service Center / Wall / Black / Base Cove / Throughout Building		(by CVES) by Thu M. Nguyen on 06/11/21
Analyst Description: Black, Homogeneous, Non-Fibrous, Basecove **Asbestos Types:** **Other Material:** Non-fibrous 100 %			
0603.13 -43	921061214-43	***No***	NAD
13	**Location:** E. Wall / Showroom / Wall / White / Base Cove Adhesive / Throughout Building		(by CVES) by Thu M. Nguyen on 06/11/21
Analyst Description: White, Homogeneous, Non-Fibrous, Adhesive **Asbestos Types:** **Other Material:** Non-fibrous 100 %			
0603.13 -44	921061214-44	***No***	NAD
13	**Location:** W. Wall / Service Center / Wall / White / Base Cove Adhesive / Throughout Building		(by CVES) by Thu M. Nguyen on 06/11/21
Analyst Description: White, Homogeneous, Non-Fibrous, Adhesive **Asbestos Types:** **Other Material:** Non-fibrous 100 %			
0603.13 -45	921061214-45	***No***	NAD
13	**Location:** N. Wall / 2nd Floor Offices / Wall / White / Base Cove Adhesive / Throughout Building		(by CVES) by Thu M. Nguyen on 06/11/21
Analyst Description: White, Homogeneous, Non-Fibrous, Adhesive **Asbestos Types:** **Other Material:** Non-fibrous 100 %			
0603.14 -46	921061214-46	***No***	NAD
14	**Location:** S. Wall / Warehouse / Wall / Gray / CMU Block / Throughout Building		(by CVES) by Thu M. Nguyen on 06/11/21
Analyst Description: Blue/Grey, Heterogeneous, Non-Fibrous, Cementitious, CMU **Asbestos Types:** **Other Material:** Non-fibrous 100 %			

See Reporting notes on last page

PLM Bulk Asbestos Report

092878.AS; Commercial Property; 777 W Orangethorpe Ave, Placentia, CA 90065

Client No. / HGA	Lab No.	Asbestos Present	Total % Asbestos
0603.14 -47	921061214-47	***No***	NAD
14	**Location:** S. Wall / Storage / Wall / Gray / CMU Block / Throughout Building		(by CVES) by Thu M. Nguyen on 06/11/21
Analyst Description: White/Grey, Heterogeneous, Non-Fibrous, Cementitious, CMU **Asbestos Types:** **Other Material:** Non-fibrous 100 %			
0603.14 -48	921061214-48	***No***	NAD
14	**Location:** N. Wall / Maintenace / Wall / Gray / CMU Block / Throughout Building		(by CVES) by Thu M. Nguyen on 06/11/21
Analyst Description: Blue/Grey, Heterogeneous, Non-Fibrous, Cementitious, CMU **Asbestos Types:** **Other Material:** Non-fibrous 100 %			
0603.15 -49	921061214-49	***No***	NAD
15	**Location:** S. Wall / Warehouse / Wall / Gray / CMU Mortar / Throughout Building		(by CVES) by Thu M. Nguyen on 06/11/21
Analyst Description: Grey, Heterogeneous, Non-Fibrous, Cementitious, Mortar **Asbestos Types:** **Other Material:** Non-fibrous 100 %			
0603.15 -50	921061214-50	***No***	NAD
15	**Location:** S. Wall / Storage / Wall / Gray / CMU Mortar / Throughout Building		(by CVES) by Thu M. Nguyen on 06/11/21
Analyst Description: Grey, Heterogeneous, Non-Fibrous, Cementitious, Mortar **Asbestos Types:** **Other Material:** Non-fibrous 100 %			
0603.15 -51	921061214-51	***No***	NAD
15	**Location:** N. Wall / Maintenace / Wall / Gray / CMU Mortar / Throughout Building		(by CVES) by Thu M. Nguyen on 06/11/21
Analyst Description: Blue/Grey, Heterogeneous, Non-Fibrous, Cementitious, Mortar **Asbestos Types:** **Other Material:** Non-fibrous 100 %			
0603.15 -52	921061214-52	***No***	NAD
15	**Location:** E. Wall / Maintenace / Wall / Gray / CMU Mortar / Throughout Building		(by CVES) by Thu M. Nguyen on 06/11/21
Analyst Description: Grey, Heterogeneous, Non-Fibrous, Cementitious, Mortar **Asbestos Types:** **Other Material:** Non-fibrous 100 %			

See Reporting notes on last page

PLM Bulk Asbestos Report

092878.AS; Commercial Property; 777 W Orangethorpe Ave, Placentia, CA 90065

Client No. / HGA	Lab No.	Asbestos Present	Total % Asbestos
0603.15 -53 15	921061214-53 **Location:** S. Wall / Service Center / Wall / Gray / CMU Mortar / Throughout Building	***No***	NAD (by CVES) by Thu M. Nguyen on 06/11/21
Analyst Description: Grey, Heterogeneous, Non-Fibrous, Cementitious, Mortar **Asbestos Types:** **Other Material:** Non-fibrous 100 %			
0603.16 -54 16	921061214-54 **Location:** N. End / Warehouse / Floor / Gray / Concrete / Throughout Property	***No***	NAD (by CVES) by Thu M. Nguyen on 06/11/21
Analyst Description: Grey, Heterogeneous, Non-Fibrous, Cementitious, Concrete **Asbestos Types:** **Other Material:** Non-fibrous 100 %			
0603.16 -55 16	921061214-55 **Location:** Center / Maintenance / Floor / Gray / Concrete / Throughout Property	***No***	NAD (by CVES) by Thu M. Nguyen on 06/11/21
Analyst Description: Grey, Heterogeneous, Non-Fibrous, Cementitious, Concrete **Asbestos Types:** **Other Material:** Non-fibrous 100 %			
0603.16 -56 16	921061214-56 **Location:** Center / Warehouse / Floor / Gray / Concrete / Throughout Property	***No***	NAD (by CVES) by Thu M. Nguyen on 06/11/21
Analyst Description: Grey, Heterogeneous, Non-Fibrous, Cementitious, Concrete **Asbestos Types:** **Other Material:** Non-fibrous 100 %			
0603.16 -57 16	921061214-57 **Location:** S. End / Parking Lot / Floor / Gray / Concrete / Throughout Property	***No***	NAD (by CVES) by Thu M. Nguyen on 06/11/21
Analyst Description: Grey, Heterogeneous, Non-Fibrous, Cementitious, Concrete **Asbestos Types:** **Other Material:** Non-fibrous 100 %			
0603.16 -58 16	921061214-58 **Location:** W. End / Parking Lot / Floor / Gray / Concrete / Throughout Property	***No***	NAD (by CVES) by Thu M. Nguyen on 06/11/21
Analyst Description: Grey, Heterogeneous, Non-Fibrous, Cementitious, Concrete **Asbestos Types:** **Other Material:** Non-fibrous 100 %			

See Reporting notes on last page

PLM Bulk Asbestos Report

092878.AS; Commercial Property; 777 W Orangethorpe Ave, Placentia, CA 90065

Client No. / HGA	Lab No.	Asbestos Present	Total % Asbestos
0603.17 -59	921061214-59	***No***	NAD
17	**Location:** S. End / Parking Lot / Floor / Black / Asphalt / Throughout Property (Exterior)		(by CVES) by Thu M. Nguyen on 06/11/21
Analyst Description: Black, Heterogeneous, Non-Fibrous, Cementitious, Asphalt **Asbestos Types:** **Other Material:** Non-fibrous 100 %			
0603.17 -60	921061214-60	***No***	NAD
17	**Location:** S. End / Parking Lot / Floor / Black / Asphalt / Throughout Property (Exterior)		(by CVES) by Thu M. Nguyen on 06/11/21
Analyst Description: Black, Heterogeneous, Non-Fibrous, Cementitious, Asphalt **Asbestos Types:** **Other Material:** Non-fibrous 100 %			
0603.17 -61	921061214-61	***No***	NAD
17	**Location:** W. End / Parking Lot / Floor / Black / Asphalt / Throughout Property (Exterior)		(by CVES) by Thu M. Nguyen on 06/11/21
Analyst Description: Black, Heterogeneous, Non-Fibrous, Cementitious, Asphalt **Asbestos Types:** **Other Material:** Non-fibrous 100 %			
0603.17 -62	921061214-62	***No***	NAD
17	**Location:** W. End / Parking Lot / Floor / Black / Asphalt / Throughout Property (Exterior)		(by CVES) by Thu M. Nguyen on 06/11/21
Analyst Description: Black, Heterogeneous, Non-Fibrous, Cementitious, Asphalt **Asbestos Types:** **Other Material:** Non-fibrous 100 %			
0603.17 -63	921061214-63	***No***	NAD
17	**Location:** W. End / Parking Lot / Floor / Black / Asphalt / Throughout Property (Exterior)		(by CVES) by Thu M. Nguyen on 06/11/21
Analyst Description: Black, Heterogeneous, Non-Fibrous, Cementitious, Asphalt **Asbestos Types:** **Other Material:** Non-fibrous 100 %			
0603.18 -64	921061214-64	***Yes***	Trace (<1 %)
18	**Location:** S.E End / Exterior / Wall / Gray / Stucco / Exterior		(by CVES) by Thu M. Nguyen on 06/11/21
Analyst Description: Tan/Grey, Heterogeneous, Fibrous, Stucco **Asbestos Types:** Chrysotile <1. % **Other Material:** Non-fibrous 100 %			

See Reporting notes on last page

PLM Bulk Asbestos Report

092878.AS; Commercial Property; 777 W Orangethorpe Ave,
Placentia, CA 90065

Client No. / HGA	Lab No.	Asbestos Present	Total % Asbestos
0603.18 -65 18	921061214-65 **Location:** S. End / Exterior / Wall / Gray / Stucco / Exterior	***Yes***	Trace (<1 %) (by CVES) by Thu M. Nguyen on 06/11/21
Analyst Description: Tan/Grey, Heterogeneous, Fibrous, Cementitious, Stucco **Asbestos Types:** Chrysotile <1. % **Other Material:** Non-fibrous 100 %			
0603.18 -66 18	921061214-66 **Location:** S.W. End / Exterior / Wall / Gray / Stucco / Exterior	***Yes***	Trace (<1 %) (by CVES) by Thu M. Nguyen on 06/11/21
Analyst Description: Tan/Grey, Heterogeneous, Fibrous, Cementitious, Stucco **Asbestos Types:** Chrysotile <1. % **Other Material:** Non-fibrous 100 %			
0603.18 -67 18	921061214-67 **Location:** W. End / Exterior / Wall / Gray / Stucco / Exterior	***No***	NAD (by CVES) by Thu M. Nguyen on 06/11/21
Analyst Description: Beige/Grey, Heterogeneous, Non-Fibrous, Cementitious, Stucco **Asbestos Types:** **Other Material:** Non-fibrous 100 %			
0603.18 -68 18	921061214-68 **Location:** N.W. End / Exterior / Wall / Gray / Stucco / Exterior	***Yes***	Trace (<1 %) (by CVES) by Thu M. Nguyen on 06/11/21
Analyst Description: Tan/Grey, Heterogeneous, Fibrous, Cementitious, Stucco **Asbestos Types:** Chrysotile <1. % **Other Material:** Non-fibrous 100 %			
0603.18 -69 18	921061214-69 **Location:** N. End / Exterior / Wall / Gray / Stucco / Exterior	***Yes***	Trace (<1 %) (by CVES) by Thu M. Nguyen on 06/11/21
Analyst Description: Tan/Grey, Heterogeneous, Fibrous, Cementitious, Stucco **Asbestos Types:** Chrysotile <1. % **Other Material:** Non-fibrous 100 %			
0603.18 -70 18	921061214-70 **Location:** N.E. End / Exterior / Wall / Gray / Stucco / Exterior	***Yes***	Trace (<1 %) (by CVES) by Thu M. Nguyen on 06/11/21
Analyst Description: Tan/Grey, Heterogeneous, Fibrous, Cementitious, Stucco **Asbestos Types:** Chrysotile <1. % **Other Material:** Non-fibrous 100 %			

See Reporting notes on last page

PLM Bulk Asbestos Report

092878.AS; Commercial Property; 777 W Orangethorpe Ave,
Placentia, CA 90065

Reporting Notes:

Analyzed By: Thu M. Nguyen Thumnguyen; Date Analyzed: 6/10/2021 6.10.21

*NAD = no asbestos detected; Detection Limit <1%; Reporting Limits: CVES = 1%, 400 Pt Ct = 0.25%, 1000 Pt Ct = 0.1%; NA = not analyzed; NA/PS = not analyzed / positive stop; NVA = No Visible Asbestos; PLM (polarized light microscopy) Bulk Asbestos Analysis by EPA 600/R-93/116, including requirements for EPA 600/M4-82-020 per 40 CFR 763 (NVLAP Lab #200346-0); Note: PLM is not consistently reliable in detecting asbestos in floor coverings and similar NOB materials. TEM is currently the only method that can be used to determine if this material can be considered or treated as non-asbestos-containing in New York State (also see EPA Advisory for floor tile, FR 59, 146, 38970, 8/1/94). NIST Accreditation requirements mandate that this report must not be reproduced except in full with the approval of the laboratory. This PLM report relates ONLY to the items tested.

Reviewed By:_____

9210612 14

TITAN ENVIRONMENTAL SOLUTIONS

Project No.: 092878.AS
Project Name: Commercial Property
Project Address: 777 W. Orangethorpe Ave, Placentia, Ca 92805
Inspector: Barba
Sample Date: 6.3.21
Send Results to: RESULTS.SOCAL@TITAN-ENVIRO.COM
Analysis: PLM Bulk Asbestos Analysis by EPA 600/R-93/116 / Other:

Special Instructions:
☐ Stop at first positive (>1%) EXCEPT for wall systems.
☒ Stop at first positive (>1%) for ALL samples.
☐ Other:

Lab:
TAT: 3 hr / 6 hr / 24 hr / (Other) 5 Days

Sample		Sample Location	Material Description	Material Locations	Quantity
0603.01	01	W. Wall / Mens RR / Wall	Color: White	Throughout Building	5000SF
	02	W. Wall / Service Center / Wall	Material: Drywall / Joint Compound		
	03	S. Wall / Service Center / Wall	Texture/Pattern		
	04	N. Wall / 2nd Floor offices / Wall	Assembly/Layers		
	05	E. Wall / Warehouse / Wall	Friable / (Non-Friable)		
	06	N. Wall / Showroom / Wall	TSI / Surf / (Misc.)		
	07	W. Wall / Offices / Wall	Condition: (G) / D / SD		
0603.02	08	E. End / Womens Locker Rm / Ceiling	Color: White	2nd Floor Offices, Showroom, Womens Locker Room	4000SF
	09	S. End / Womens Lockers Room / Ceiling	Material: Acoustic		
	10	S. End / 2nd Floor Offices / Ceiling	Texture/Pattern		
	11	Center / Showroom / Ceiling	Assembly/Layers		
	12	Center / Offices / Ceiling	(Friable) / Non-Friable		
			TSI / (Surf) / Misc.		
			Condition: (G) / D / SD		
0603.03	13	N. End / Safe Room / Floor	Color: Beige	Safe Room, Server Room	150SF
	14	S. End / Safe Room / Floor	Material: Vinyl Flooring		
	15	N. End / Server Room / Floor	Texture/Pattern		
			Assembly/Layers		
			Friable / (Non-Friable)		
			TSI / Surf / (Misc.)		
			Condition: (G) / D / SD		

Relinquished to Office / Courier: _____ Received By: _____ Date / Time: 6.4.21 @ 8:00
Relinquished to Lab: _____ Received By: _____ Date / Time: 6.3.21

TI

9210612 14

Sample Number		Sample Location	Material Description	Material Locations	Quantity
0603.04	16	S.End / 2nd Floor / Ceiling	Size/Color: NA / Yellow	2nd Floor Offices	100 LF
	17	↓ ↓ ↓	Material: HVAC Duct Insulation	(above ceiling tiles)	
	18		Texture/Pattern		
			Assembly/Layers		
			TSI / Surf / ~~Misc~~		
			Friable / Non-Friable		
			Condition: G / D / SD		
0603.05	19	S.End / 2nd Flr / Floor	Size/Color: NA / Tan	2nd Floor Offices	1800SF
	20	W.End / 2nd Floor / Floor	Material: Carpet Glue		
	21	N.End / 2nd Floor / Floor	Texture/Pattern		
			Assembly/Layers		
			TSI / Surf / Misc		
			Friable / Non-Friable		
			Condition: G / D / SD		
0603.06	22	Center / 2nd Flr Offices / Ceiling	Size/Color: NA / White	2nd Floor Offices, Show	2500SF
	23	Center / Showroom / Ceiling	Material: 2x4 Ceiling Tile	Room, Service Center	
	24	Center / Service Center / Ceiling	Texture/Pattern		
			Assembly/Layers		
			TSI / Surf / Misc		
			Friable / Non-Friable		
			Condition: G / D / SD		
0603.07	25	N.End / Service Center / Floor	Size/Color: NA / Black	Showroom, Service	250SF
	26	S.End / Service Center / Floor	Material: 12x12 Floor Tile	Center	
	27	Center / Showroom / Floor	Texture/Pattern		
			Assembly/Layers		
			TSI / Surf / Misc		
			Friable / Non-Friable		
			Condition: G / D / SD		

Rec'd by [illegible] 6/4/21 @ 8:00

9210612 14

Sample Number		Sample Location	Material Description	Material Locations	Quantity
0603.08	28	W. End / Showroom / Floor	NA / Gray	Show Room, Offices	5000SF
	29	S. End / Showroom / Floor	12x12 Floor Tile		
	30	E. End / offices / Floor	Texture/Pattern		
			Assembly/Layers		
			TSI / Surf / (Misc)		
			Friable / (Non-Friable)		
			Condition: (G) / D / SD		
0603.09	31	N. End / Service Center / Floor	NA / Black	Service Center, Show	5200SF
	32	Center / offices / Floor	Mastic	Room, Offices	
	33	Center / Showroom / Floor	Texture/Pattern		
			Assembly/Layers		
			TSI / Surf / (Misc)		
			Friable / (Non-Friable)		
			Condition: (G) / D / SD		
0603.10	34	S. End / Showroom / Floor	NA / Tan	Show Room, offices.	1000SF
	35	W. End / Showroom / Floor	Mastic		
	36	N. End / Showroom / Floor	Texture/Pattern		
			Assembly/Layers		
			TSI / Surf / (Misc)		
			Friable / (Non-Friable)		
			Condition: (G) / D / SD		
0603.11	37	N. Wall / 2nd Floor / Wall	NA / Brown	2nd Floor offices	250LF
	38	W. Wall / 2nd Floor / Wall	Base Cove		
	39	S. Wall / 2nd Floor / Wall	Texture/Pattern		
			Assembly/Layers		
			TSI / Surf / (Misc)		
			Friable / (Non-Friable)		
			Condition: (G) / D / SD		

Rec'd by DJR 6/4/21 @ 8:00 GLL

TI

9210611214

Sample Number		Sample Location	Material Description	Material Locations	Quantity
0603.12	40	E. Wall / Warehouse / Wall	NA / Black	Throughout Building	1000 LF
	41	E. Wall / Showroom / Wall	Base Cove		
	42	W. Wall / Service Center / Wall	Texture/Pattern		
			Assembly/Layers		
			TSI / Surf / (Misc)		
			Friable / ~~Non-Friable~~		
			Condition: (G) / D / SD		
0603.13	43	E. Wall / Showroom / Wall	NA / White	Throughout Building	1250LF
	44	W. Wall / Service Center / Wall	Base Cove Adhesive		
	45	N. Wall / 2nd Floor offices / Wall	Texture/Pattern		
			Assembly/Layers		
			TSI / Surf / (Misc)		
			Friable / (Non-Friable)		
			Condition: (G) / D / SD		
0603.14	46	S. Wall / Warehouse / Wall	NA / Gray	Throughout Building	15,000SF
	47	S. Wall / Storage / Wall	CMU Block		
	48	N. Wall / Maintenance / Wall	Texture/Pattern		
			Assembly/Layers		
			TSI / Surf / (Misc)		
			Friable / (Non-Friable)		
			Condition: (G) / D / SD		
0603.15	49	S. Wall / Warehouse / Wall	NA / Gray	Throughout Building	15,000SF
	50	S. Wall / Storage / Wall	CMU Mortar		
	51	N. Wall / Maintenance / Wall	Texture/Pattern		
	52	E. Wall / Maintenance / Wall	Assembly/Layers		
	53	S. Wall / Service Center / Wall	TSI / Surf / (Misc)		
			Friable / (Non-Friable)		
			Condition: (G) / D / SD		

Recd by [illegible] 6/4/21 8:00

TI

92106214

Sample Number		Sample Location	Material Description	Material Locations	Quantity
0603.16	54	N. End / Warehouse / Floor	Size/Color: NA / Gray	Throughout Property	>10,000SF
	55	Center / Maintenance / Floor	Material: Concrete		
	56	Center / Warehouse / Floor	Texture/Pattern		
	57	S. End / Parking Lot / Floor	Assembly/Layers		
	58	W. End / Parking Lot / Floor	TSI / Surf / (Misc)		
			Friable / (Non-Friable)		
			Condition: (G) / D / SD		
0603.17	59	S. End / Parking Lot / Floor	Size/Color: NA / Black	Throughout Property	>10,000SF
	60	S. End / Parking Lot / Floor	Material: Asphalt	(Exterior)	
	61	W. End / Parking Lot / Floor	Texture/Pattern		
	62	W. End / Parking Lot / Floor	Assembly/Layers		
	63	W. End / Parking Lot / Floor	TSI / Surf / (Misc)		
			Friable / (Non-Friable)		
			Condition: (G) / D / SD		
0603.18	64	S.E. End / Exterior / Wall	Size/Color: NA / Gray	Exterior	15,000SF
	65	S. End / Exterior / Wall	Material: Stucco		
	66	S.W. End / Exterior / Wall	Texture/Pattern		
	67	W. End / Exterior / Wall	Assembly/Layers		
	68	N.W. End / Exterior / Wall	TSI / Surf / (Misc)		
	69	N. End / Exterior / Wall	Friable / (Non-Friable)		
	70	N.E. End / Exterior / Wall	Condition: (G) / D / SD		
0603.19		Roofing unaccessible due	Size/Color		
		to no Key for padlock.	Material		
		All Roofing material PACM	Texture/Pattern		
		(Presumed asbestos Containing	Assembly/Layers		
		Material)	TSI / Surf / Misc		
			Friable / Non-Friable		
			Condition: G / D / SD		

Rec'd by [illegible] 6/4/16 8:00

TI

TITAN

Project Number: 092878 · XRF

Project Name: Commercial Property

Project Address: 777 W. Orangethorpe Ave, Placentia, Ca 92865

Date of Inspection: 6·3·21

Time of Inspection: 930 am

CDPH Inspector Name: Barela

XRF Manufacture (Viken, RMD or Niton):

XRF Serial Number: 3642

Assay Date: 5·14·20

Inspection County:

Paint Condition Codes: I = Intact, D = Deteriorated

Structure Type (Single Story or (Multi-story)):

Children under the age of 18 reside and/or present in residence/Structure (Yes or (No)):

Sample Number	Room	Wall	Component	Substrate	Paint Condition	Color	Lead (MG/CM2)
0603· 01	cal	~~N/E/S/W~~	———	———	~~Intact / Deteriorated~~	———	0.7
02	cal	N/E/S/W	———	———	Intact / ~~Deteriorated~~	———	0.7
03	cal	~~N/E/S/W~~	———	———	Intact / ~~Deteriorated~~	———	0.8
04	Maintenance Shop	N/(E)/S/W	Wall	CMU	(Intact) / Deteriorated	Blue	-0.3
05	↓	(N)/E/S/W	Rolling door	Metal	Intact / Deteriorated	Beige	-0.2
06	↓	N/E/S/(W)	Conduit	Metal	~~Intact~~ / Deteriorated	Blue	-0.1
07	↓	N/E/(S)/W	Door	Metal	Intact / Deteriorated	Blue	-0.3
08	↓	N/E/(S)/W	Door Frame	Metal	(Intact) / Deteriorated	Blue	-0.2
09	↓	N/(E)/S/W	Floor	Concrete	~~Intact~~ / Deteriorated	Yellow	-0.8
10	Maintenance Bathrooms	N/E/S/(W)	Wall	Drywall	(Intact) / Deteriorated	Gray	-0.2
11	↓	N/(E)/S/W	Door	Wood	(Intact) / Deteriorated	Blue	-0.3
12	↓	N/(E)/S/W	Door Frame	Wood	(Intact) / Deteriorated	Blue	-0.2
13	Service Center	N/E/S/(W)	Wall	Drywall	(Intact) / Deteriorated	White	-0.2
14	↓	N/E/S/(W)	Door	Wood	(Intact) / Deteriorated	White	-0.1
15	↓	N/E/S/(W)	Door Frame	Wood	(Intact) / Deteriorated	White	-0.3
16	Warehouse	N/E/(S)/W	Wall	CMU	(Intact) / Deteriorated	White	-0.2
17	↓	N/E/(S)/W	Door	Metal	(Intact) / Deteriorated	White	-0.2
18	↓	N/E/(S)/W	Door Frame	Metal	(Intact) / Deteriorated	White	-0.1
19	↓	N/E/S/(W)	Stairwell	Metal	(Intact) / Deteriorated	White	-0.5

IH Signature [signature]

Date 6·3·21

TITAN

Project Number: 092878·XRF | Project Name: Commercial Property

Sample Number	Room	Wall	Component	Substrate	Paint Condition	Color	Lead (MG/CM2)
0603. 20	Womens Locker Room	(N)/E/S/W	Wall	Drywall	Intact / Deteriorated	Gray	-0.2
21	↓	N/E/S/(W)	Wall	Ceramic	Intact / Deteriorated	Gray	-0.7
22		(N)/E/S/W	Door	Wood	Intact / Deteriorated	Blue	-0.1
23		(N)/E/S/W	Door Frame	Wood	Intact / Deteriorated	Blue	-0.3
24	↓	N/(E)/S/W	Ceiling	acoustic	Intact / Deteriorated	White	-0.2
25	Show Room	(N)/E/S/W	Wall	Drywall	Intact / Deteriorated	Gray	-0.2
26	↓	N/(E)/S/W	Door	Wood	Intact / Deteriorated	Gray	-0.3
27	↓	N/(E)/S/W	Door Frame	Wood	Intact / Deteriorated	Gray	-0.1
28	Mens Room	N/E/S/(W)	Wall	Drywall	Intact / Deteriorated	White	-0.3
29	↓	N/E/S/(W)	Wall	Ceramic	Intact / Deteriorated	Beige	-0.5
30	↓	N/(E)/S/W	Floor	Ceramic	Intact / Deteriorated	Beige	-0.3
31	↓	N/E/(S)/W	Door	Wood	Intact / Deteriorated	White	-0.2
32	↓	N/E/(S)/W	Door Frame	Wood	Intact / Deteriorated	White	-0.1
33	Womens	N/E/S/(W)	Wall	Drywall	Intact / Deteriorated	Beige	-0.2
34	↓	N/E/S/(W)	Wall	Ceramic	Intact / Deteriorated	Beige	-0.4
35	↓	N/(E)/(S)/W	Door	Wood	Intact / Deteriorated	White	-0.2
36	↓	N/E/(S)/W	Door Frame	Wood	Intact / Deteriorated	White	-0.2
37	↓	N/(E)/S/W	Floor	Ceramic	Intact / Deteriorated	Beige	-0.5
38	2nd Floor Offices	N/E/(S)/W	Wall	Drywall	Intact / Deteriorated	White	-0.1
39	↓	N/(E)/S/W	Door	Wood	Intact / Deteriorated	White	-0.3
40	↓	N/(E)/S/W	Door Frame	Wood	Intact / Deteriorated	White	-0.2
41	↓	N/E/S/(W)	Ceiling	acoustic	Intact / Deteriorated	White	-0.2
42	Exterior	N/E/S/(W)	Wall	Stucco	Intact / Deteriorated	Beige	-0.4
43	↓	N/E/(S)/W	Eaves	Wood	Intact / Deteriorated	Beige	-0.0
44	↓	(N)/E/S/W	Column	Metal	Intact / Deteriorated	Beige	-0.2

IH Signature _____ Date 6.3.21

TITAN
ENVIRONMENTAL SOLUTIONS

Project Number: 092878. XRF	Project Name: Commercial Property

Sample Number	Room	Wall	Component	Substrate	Paint Condition	Color	Lead (MG/CM2)
0603. 45	Exterior	N / E / S / W (W circled)	Handrails	Metal	Intact (circled) / Deteriorated	Black	-0.6
46	↓	N / E / S / W (W circled)	Roof Drain	Metal	Intact (circled) / Deteriorated	Beige	-0.3
47	↓	N / E / S / W (W circled)	Roll up door	Metal	Intact (circled) / Deteriorated	Beige	-0.4
48	Ceil	~~N / E / S /~~ W	—	—	~~Intact / Deteriorated~~	—	0.8
49	Ceil	~~N / E / S /~~ W	—	—	~~Intact / Deteriorated~~	—	0.9
50	Ceil	~~N / E / S /~~ W	—	—	~~Intact / Deteriorated~~	—	0.7
		N / E / S / W			Intact / Deteriorated		
		N / E / S / W			Intact / Deteriorated		
		N / E / S / W			Intact / Deteriorated		
		N / E / S / W			Intact / Deteriorated		
		N / E / S / W			Intact / Deteriorated		
		N / E / S / W			Intact / Deteriorated		
		N / E / S / W			Intact / Deteriorated		
		N / E / S / W			Intact / Deteriorated		
		N / E / S / W			Intact / Deteriorated		
		N / E / S / W			Intact / Deteriorated		
		N / E / S / W			Intact / Deteriorated		
		N / E / S / W			Intact / Deteriorated		
		N / E / S / W			Intact / Deteriorated		
		N / E / S / W			Intact / Deteriorated		
		N / E / S / W			Intact / Deteriorated		
		N / E / S / W			Intact / Deteriorated		
		N / E / S / W			Intact / Deteriorated		
		N / E / S / W			Intact / Deteriorated		
		N / E / S / W			Intact / Deteriorated		

IH Signature: [signature]

Date: 6.3.21

AmeriSci Los Angeles
24416 S. Main Street, Ste 308
Carson, California 90745
TEL: (310) 834-4868 • FAX: (310) 834-4772

PLM Bulk Asbestos Report

Titan Environmental Solutions, Inc.
Attn: Titan Environmental
1521 E. Orangethorpe Ave.
Suite B
Fullerton, CA 92831

Date Received 06/10/21
Date Examined 06/15/21

AmeriSci Job # 921061583
P.O. #

RE: 092878-AS; Commercial Property; 777 W. Orangethorpe Ave Placentia CA 90085 (Report Amended 6/16/2021)

Client No. / HGA	Lab No.	Asbestos Present	Total % Asbestos
0610-01-01	921061583-01.1	*No*	NAD
01	**Location:** W. End / Exterior / Roof / Black Roofing Material / Exterior - Roof		(by CVES) by Dennis Liu on 06/15/21
Analyst Description: Black/Silver, Heterogeneous, Non-Fibrous, Roofing Shingle **Asbestos Types:** **Other Material:** Synthetic fibers 30 %, Non-fibrous 70 %			
0610-01-01	921061583-01.2	*No*	NAD
01	**Location:** W. End / Exterior / Roof / Black Roofing Material / Exterior - Roof		(by CVES) by Dennis Liu on 06/15/21
Analyst Description: Black, Heterogeneous, Non-Fibrous, Roofing Sheet **Asbestos Types:** **Other Material:** Cellulose 30 %, Non-fibrous 70 %			
0610-01-02	921061583-02.1	*No*	NAD
01	**Location:** Center / Exterior / Roof / Black Roofing Material / Exterior - Roof		(by CVES) by Dennis Liu on 06/15/21
Analyst Description: Black/Silver, Heterogeneous, Non-Fibrous, Roofing Shingle **Asbestos Types:** **Other Material:** Synthetic fibers 30 %, Non-fibrous 70 %			
0610-01-02	921061583-02.2	*No*	NAD
01	**Location:** Center / Exterior / Roof / Black Roofing Material / Exterior - Roof		(by CVES) by Dennis Liu on 06/15/21
Analyst Description: Black, Heterogeneous, Non-Fibrous, Roofing Sheet **Asbestos Types:** **Other Material:** Cellulose 30 %, Non-fibrous 70 %			
0610-01-03	921061583-03	*No*	NAD
01	**Location:** E. End / Exterior / Roof / Black Roofing Material / Exterior - Roof		(by CVES) by Dennis Liu on 06/15/21
Analyst Description: Black/Grey, Heterogeneous, Non-Fibrous, Roofing **Asbestos Types:** **Other Material:** Fibrous glass 10 %, Non-fibrous 90 %			

See Reporting notes on last page

PLM Bulk Asbestos Report

092878-AS; Commercial Property; 777 W. Orangethorpe Ave
Placentia CA 90085 (Report Amended 6/16/2021)

Client No. / HGA	Lab No.	Asbestos Present	Total % Asbestos
0610-02-04 02	921061583-04 **Location:** W. End / Exterior / Roof / Black Roof Felt / Exterior - Roof	***No***	NAD (by CVES) by Dennis Liu on 06/15/21
Analyst Description: Black, Heterogeneous, Non-Fibrous, Roofing Felt **Asbestos Types:** **Other Material:** Fibrous glass 20 %, Non-fibrous 80 %			
0610-02-05 02	921061583-05 **Location:** Center / Exterior / Roof / Black Roof Felt / Exterior - Roof	***No***	NAD (by CVES) by Dennis Liu on 06/15/21
Analyst Description: Black, Heterogeneous, Non-Fibrous, Roofing Felt **Asbestos Types:** **Other Material:** Cellulose 40 %, Non-fibrous 60 %			
0610-02-06 02	921061583-06 **Location:** E. End / Exterior / Roof / Black Roof Felt / Exterior - Roof	***No***	NAD (by CVES) by Dennis Liu on 06/15/21
Analyst Description: Black, Heterogeneous, Non-Fibrous, Roofing Felt **Asbestos Types:** **Other Material:** Cellulose 40 %, Non-fibrous 60 %			
0610-03-07 03	921061583-07 **Location:** W. Wall / Exterior / Parapet / Black Roofing Material (Parapet) / Exterior - Roof (Parapet Wall)	***No***	NAD (by CVES) by Dennis Liu on 06/15/21
Analyst Description: Black/Silver, Heterogeneous, Non-Fibrous, Roofing **Asbestos Types:** **Other Material:** Cellulose 30 %, Non-fibrous 70 %			
0610-03-08 03	921061583-08 **Location:** N. Wall / Exterior / Parapet / Black Roofing Material (Parapet) / Exterior - Roof (Parapet Wall)	***No***	NAD (by CVES) by Dennis Liu on 06/15/21
Analyst Description: Black/Silver, Heterogeneous, Non-Fibrous, Roofing **Asbestos Types:** **Other Material:** Cellulose 30 %, Non-fibrous 70 %			
0610-03-09 03	921061583-09 **Location:** E. Wall / Exterior / Parapet / Black Roofing Material (Parapet) / Exterior - Roof (Parapet Wall)	***No***	NAD (by CVES) by Dennis Liu on 06/15/21
Analyst Description: Black/Silver, Heterogeneous, Non-Fibrous, Roofing **Asbestos Types:** **Other Material:** Cellulose 30 %, Non-fibrous 70 %			

See Reporting notes on last page

PLM Bulk Asbestos Report

092878-AS; Commercial Property; 777 W. Orangethorpe Ave
Placentia CA 90085 (Report Amended 6/16/2021)

Client No. / HGA	Lab No.	Asbestos Present	Total % Asbestos
0610-04-10 04	921061583-10 **Location:** E. End / Exterior / Roof / Gray Roof / Penetration Mastic / Exterior - Roof - Penetrations	***No***	NAD (by CVES) by Dennis Liu on 06/15/21
Analyst Description: Black/Grey, Heterogeneous, Non-Fibrous, Penetration Mastic **Asbestos Types:** **Other Material:** Cellulose 20 %, Non-fibrous 80 %			
0610-04-11 04	921061583-11 **Location:** Center / Exterior / Penetration / Gray Roof / Penetration Mastic / Exterior - Roof - Penetrations	***Yes***	5 % (by CVES) by Dennis Liu on 06/15/21
Analyst Description: Black/Grey, Heterogeneous, Non-Fibrous, Penetration Mastic **Asbestos Types:** Chrysotile 5.0 % **Other Material:** Non-fibrous 95 %			
0610-04-12 04	921061583-12 **Location:** W. End / Exterior / Penetration / Gray Roof / Penetration Mastic / Exterior - Roof - Penetrations		NA/PS
Analyst Description: Bulk Material **Asbestos Types:** **Other Material:**			
0610-05-13 05	921061583-13 **Location:** S. End / Exterior / HVAC Duct / Gray HVAC Duct Mastic / Exterior - HVAC Ducts	***No***	NAD (by CVES) by Dennis Liu on 06/15/21
Analyst Description: Black/Grey, Heterogeneous, Fibrous, Mastic **Asbestos Types:** **Other Material:** Cellulose 5 %, Synthetic fibers 2 %, Non-fibrous 93 %			
0610-05-14 05	921061583-14 **Location:** S. End / Exterior / HVAC Duct / Gray HVAC Duct Mastic / Exterior - HVAC Ducts	***Yes***	5 % (by CVES) by Dennis Liu on 06/15/21
Analyst Description: Black/Grey, Heterogeneous, Non-Fibrous, Mastic **Asbestos Types:** Chrysotile 5.0 % **Other Material:** Non-fibrous 95 %			
0610-05-15 05	921061583-15 **Location:** S. End / Exterior / HVAC Duct / Gray HVAC Duct Mastic / Exterior - HVAC Ducts		NA/PS
Analyst Description: Bulk Material **Asbestos Types:** **Other Material:**			

See Reporting notes on last page

PLM Bulk Asbestos Report

092878-AS; Commercial Property; 777 W. Orangethorpe Ave
Placentia CA 90085 (Report Amended 6/16/2021)

Client No. / HGA	Lab No.	Asbestos Present	Total % Asbestos
0610-06-16 06	921061583-16	***No***	NAD (by CVES) by Dennis Liu on 06/15/21
Location: S. End / Exterior / HVAC Duct / Tan HVAC Seam Tape / Exterior - Roof - HVAC Ducts			
Analyst Description: Black/Tan, Heterogeneous, Non-Fibrous, Seam Tape **Asbestos Types:** **Other Material:** Cellulose 30 %, Non-fibrous 70 %			
0610-06-17 06	921061583-17	***No***	NAD (by CVES) by Dennis Liu on 06/15/21
Location: E. End / Exterior / HVAC Duct / Tan HVAC Seam Tape / Exterior - Roof - HVAC Ducts			
Analyst Description: Black/Tan, Heterogeneous, Non-Fibrous, Seam Tape **Asbestos Types:** **Other Material:** Cellulose 30 %, Non-fibrous 70 %			
0610-06-18	921061583-18	***No***	NAD (by CVES) by Dennis Liu on 06/15/21
Location: W. End / Exterior / HVAC Duct / Tan HVAC Seam Tape / Exterior - Roof - HVAC Ducts			
Analyst Description: Black/Tan, Heterogeneous, Non-Fibrous, Seam Tape **Asbestos Types:** **Other Material:** Cellulose 30 %, Non-fibrous 70 %			

Reporting Notes:

Analyzed By: Dennis Liu for Dennis; Date Analyzed: 6/15/2021 6/16/21

*NAD = no asbestos detected; Detection Limit <1%; Reporting Limits: CVES = 1%, 400 Pt Ct = 0.25%, 1000 Pt Ct = 0.1%; NA = not analyzed; NA/PS = not analyzed / positive stop; NVA = No Visible Asbestos; PLM (polarized light microscopy) Bulk Asbestos Analysis by EPA 600/R-93/116, including requirements for EPA 600/M4-82-020 per 40 CFR 763 (NVLAP Lab #200346-0); Note: PLM is not consistently reliable in detecting asbestos in floor coverings and similar NOB materials. TEM is currently the only method that can be used to determine if this material can be considered or treated as non-asbestos-containing in New York State (also see EPA Advisory for floor tile, FR 59, 146, 38970, 8/1/94). NIST Accreditation requirements mandate that this report must not be reproduced except in full with the approval of the laboratory. This PLM report relates ONLY to the items tested.

Reviewed By:

TITAN ENVIRONMENTAL SOLUTIONS

Project No.: 092878·AS
Project Name: Commercial Property
Project Address: 777 W. Orangethorpe Ave, Placentia, Ca 90605
Inspector: Barela
Sample Date: 6·10·21
Send Results to: RESULTS.SOCAL@TITAN-ENVIRO.COM
Analysis: PLM Bulk Asbestos Analysis by EPA 600/R-93/116 / Other:

Special Instructions: 9210161583
☐ Stop at first positive (>1%) **EXCEPT** for wall systems.
☒ Stop at first positive (>1%) for **ALL** samples.
☐ Other:

Lab: Amrisci
TAT: 3 hr / 6 hr / 24 hr / (Other) 3 Days

Sample		Sample Location	Material Description	Material Locations	Quantity
0610·01	01	W. End / Exterior / Roof	NA / Black	Exterior - Roof	>10,000SF
	02	Center / Exterior / Roof	Roofing Material		
	03	E. End / Exterior / Roof	Texture/Pattern		
			Assembly/Layers		
			Friable / (Non-Friable)		
			TSI / Surf / (Misc.)		
			Condition: (G) / D / SD		
0610·02	04	W. End / Exterior / Roof	NA / Black		
	05	Center / Exterior / Roof	Roof Felt	Exterior - Roof	>10,000SF
	06	E. End / Exterior / Roof	Texture/Pattern		
			Assembly/Layers		
			Friable / (Non-Friable)		
			TSI / Surf / (Misc.)		
			Condition: (G) / D / SD		
0610·03	07	W. Wall / Exterior / Parapit	NA / Black	Exterior - Roof	5000SF
	08	N. Wall / Exterior / Parapit	Roofing Material (Parapit)	& Parapit Wall)	
	09	E. Wall / Exterior / Parapit	Texture/Pattern		
			Assembly/Layers		
			Friable / (Non-Friable)		
			TSI / Surf / (Misc.)		
			Condition: (G) / D / SD		

Relinquished to Office / Courier: _____ Received By: _____ Date / Time: 6/10/21 @ 11:45
Relinquished to Lab: _____ Received By: _____ Date / Time: 6·10·21

TT

921001583

Sample Number		Sample Location	Material Description	Material Locations	Quantity
0610.04	10	E. End / Exterior / Roof	Size/Color: NA / Gray	Exterior - Roof - Penetrations	3000SF
	11	Center / Exterior / Penetration	Material: Roof / Penetration Mastic		
	12	W. End / Exterior / Penetration	Texture/Pattern		
			Assembly/Layers		
			TSI / Surf / (Misc)		
			Friable / (Non-Friable)		
			Condition: (G) / D / SD		
0610.05	13	S. End / Exterior / HVAC Duct	Size/Color: NA / Gray	Exterior - HVAC Ducts	3000SF
	14	↓ ↓ ↓	Material: HVAC Duct Mastic		
	15		Texture/Pattern		
			Assembly/Layers		
			TSI / Surf / Misc		
			Friable / Non-Friable		
			Condition: G / D / SD		
0610.06	16	S. End / Exterior / HVAC Duct	Size/Color: NA / Tan	Exterior - Roof - HVAC Units	1000SF
	17	E. End / Exterior / HVAC Duct	Material: HVAC Seam Tape		
	18	W. End / Exterior / HVAC Duct	Texture/Pattern		
			Assembly/Layers		
			TSI / Surf / Misc		
			Friable / Non-Friable		
			Condition: G / D / SD		
0610.07		2 Two foot Transite pipes PACM (Presumed Asbestos Containing Material)	Size/Color		
			Material		
			Texture/Pattern		
			Assembly/Layers		
			TSI / Surf / Misc		
			Friable / Non-Friable		
			Condition: G / D / SD		

Recd by GP 6/10/21e 11:15

Titan Environmental Solutions, Inc. - Project # 092878.AS **Asbestos Bulk Sample Chain Of Custody**

TT

TITAN ENVIRONMENTAL SOLUTIONS

Project Number: 092878.XRF		Date of Inspection: 6.10.21
Project Name: Commercial Property		Time of Inspection: 8am
Project Address: 777 W. Orangethorpe ave, Placentia, Ca 90065		CDPH Inspector Name: Barula
XRF Manufacture (Viken, RMD or Niton):	XRF Serial Number: 3642	Assay Date: 5.14.20
Inspection County:	Paint Condition Codes: I = Intact, D = Deteriorated	
Structure Type (Single Story or Multi-story):	Children under the age of 18 reside and/or present in residence/Structure (Yes or No):	

Sample Number	Room	Wall	Component	Substrate	Paint Condition	Color	Lead (MG/CM2)
0610. 01	Cal	~~N/E/S/W~~			~~Intact / Deteriorated~~		0.7
02	cal	N/~~E/S/W~~			Intact / ~~Deteriorated~~		0.7
03	cal	~~N/E/S/W~~			Intact / ~~Deteriorated~~		0.7
04	Roof	N/E/(S)/W	Stairwell Door	Metal	(Intact) / Deteriorated	White	-0.2
05	↓	N/E/(S)/W	Door Frame	Wood	(Intact) / Deteriorated	White	-0.3
06		N/(E)/S/W	Stairwell wall	Wood	(Intact) / Deteriorated	Yellow	-0.5
07		(N)/E/S/W	HVAC Duct	Metal	(Intact) / Deteriorated	Silver	-0.4
08		N/E/S/(W)	HVAC Unit	Metal	(Intact) / Deteriorated	Chrome	-0.1
09		N/E/(S)/W	Conduit	Metal	(Intact) / Deteriorated	Chrome	-0.2
10	Cal	~~N/E/S/W~~			Intact / ~~Deteriorated~~		0.8
11	cal	N/~~E/S/W~~			Intact / ~~Deteriorated~~		0.9
12	cal	~~N/E/S/~~W			Intact / ~~Deteriorated~~		0.7
		N/E/S/W			Intact / Deteriorated		
		N/E/S/W			Intact / Deteriorated		
		N/E/S/W			Intact / Deteriorated		
		N/E/S/W			Intact / Deteriorated		
		N/E/S/W			Intact / Deteriorated		
		N/E/S/W			Intact / Deteriorated		
		N/E/S/W			Intact / Deteriorated		
		N/E/S/W			Intact / Deteriorated		

IH Signature _____ Date 6.10.21

ATTACHMENT II

Photo Log

Photo #1: Exterior of Showroom

Photo #2: Exterior of Service Center

Photo #3: Photo of positive sample group 0603-02 – White Acoustic

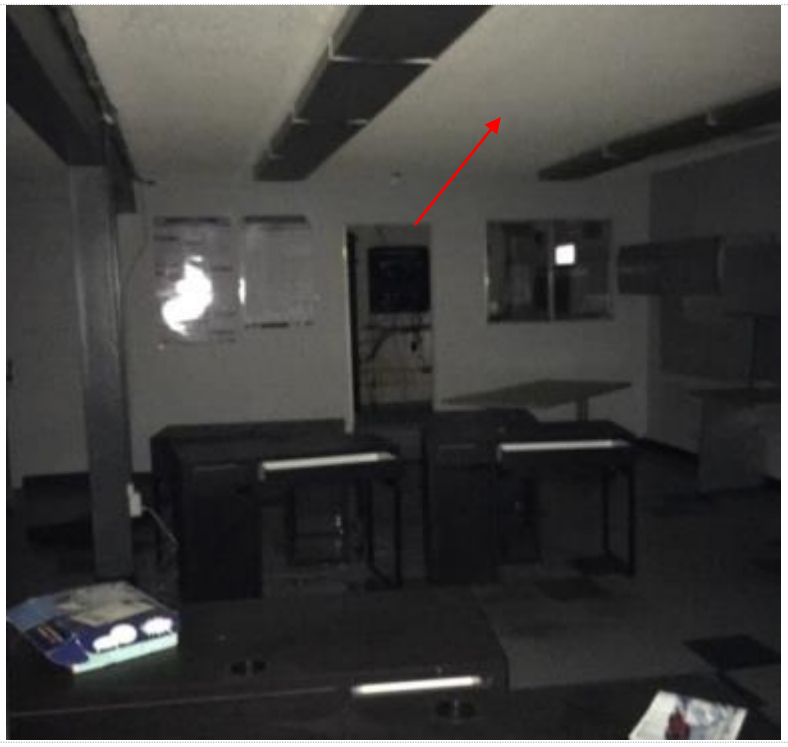


Photo #4: Photo of positive sample group 0603-02 – White Acoustic

Photo #5: Photo of sample group 0603-08 (12x12 gray floor tile) and positive sample group 0603-09 (black mastic),

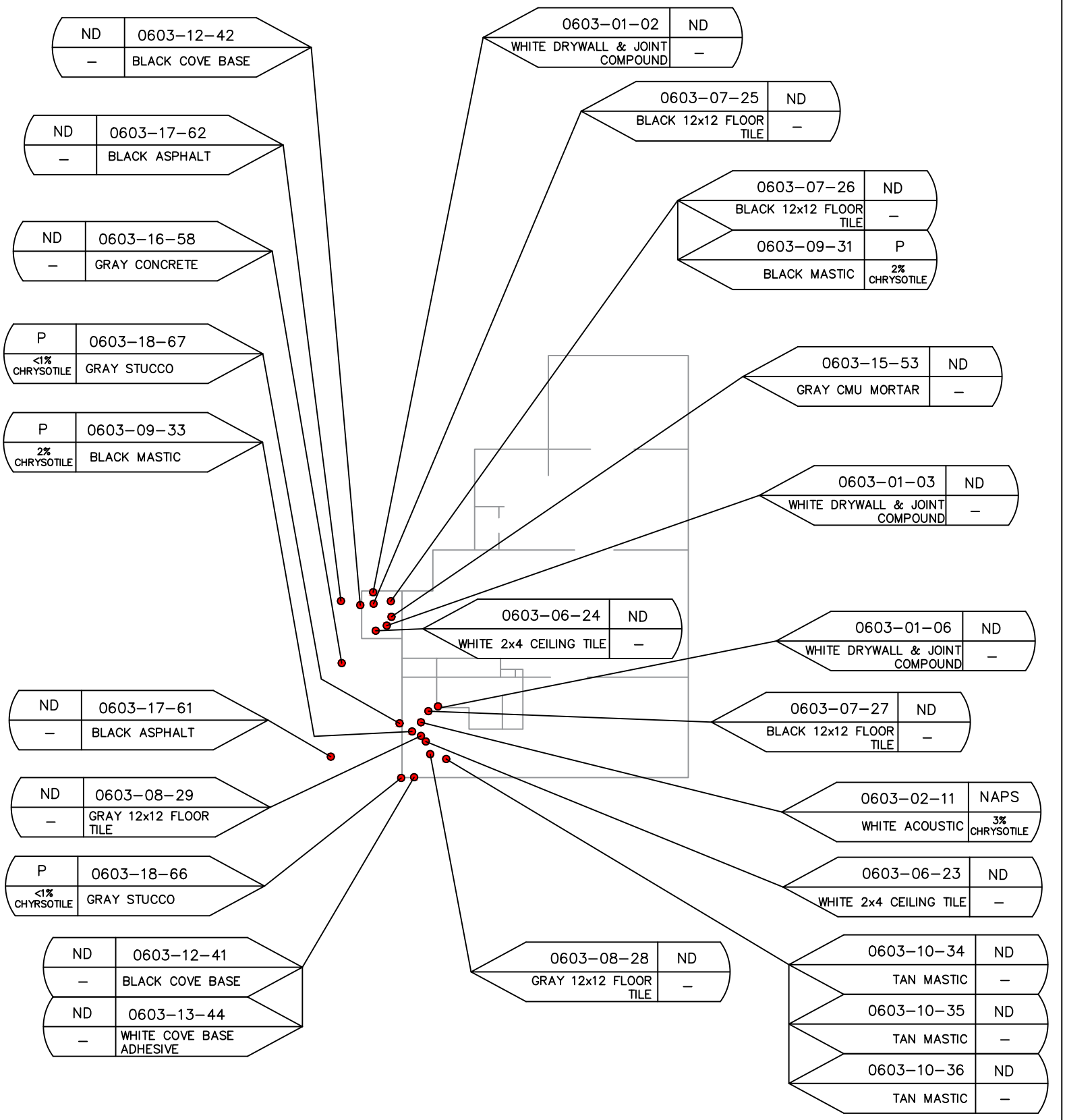
Photo #6: Photo of positive sample group 0603-18 (gray stucco)

Photo #7: Photo of positive sample group 0610-04 – Gray Roof Penetration Mastic

Photo #8: Photo of positive sample group 0610-05 – Gray HVAC Duct Mastic

ATTACHMENT III

CAD Floor Plan Drawings



LEGEND

SAMPLE IDENTIFICATION — SAMPLE RESULT

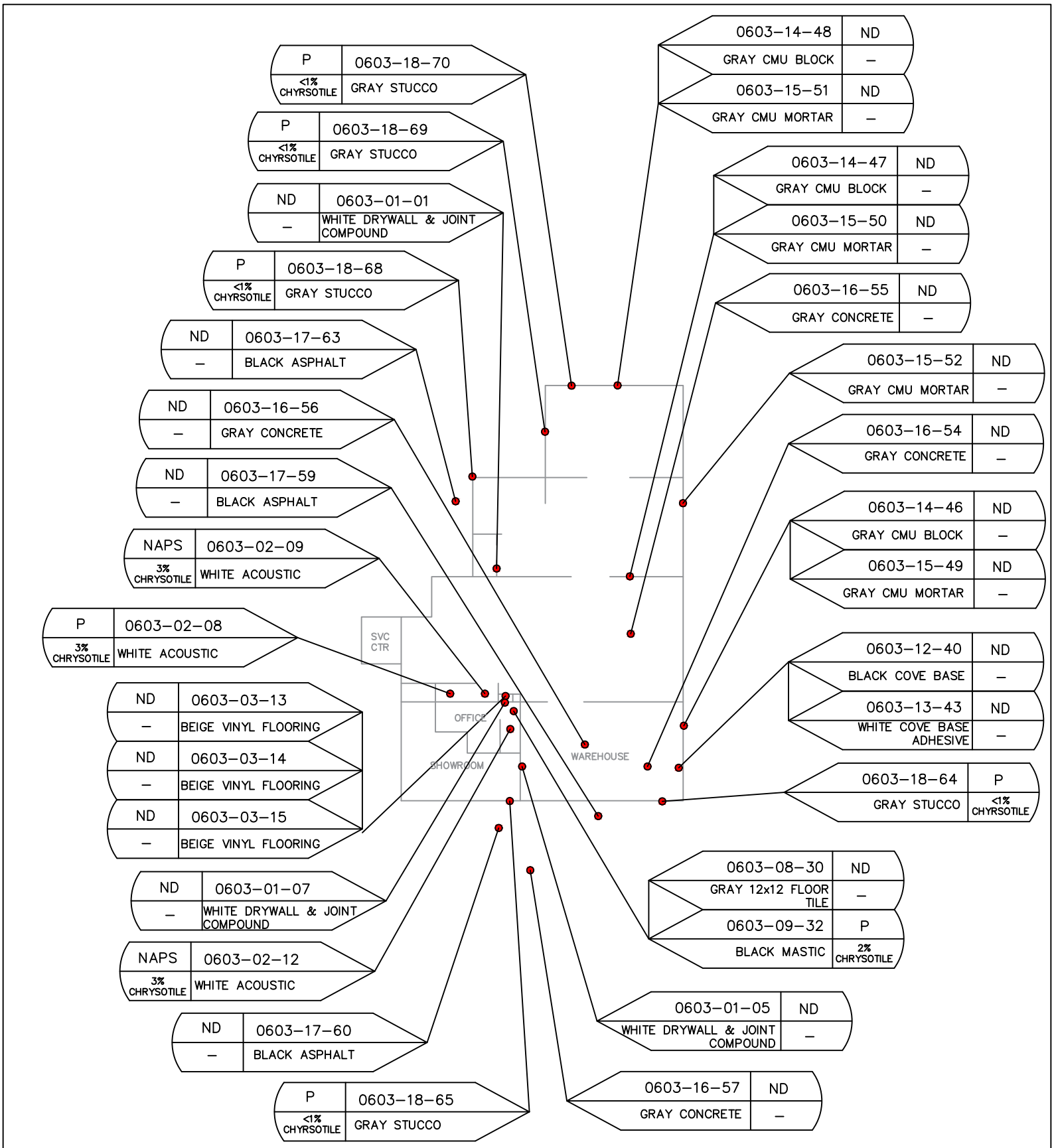
MATERIAL DESCRIPTION/ LAYER — PERCENTAGE OF ASBESTOS

ND	NOT DETECTED
NAPS	NOT ANALYZED,POSITIVE STOP
P	POSITIVE

N

PROJECT NAME	COMMERCIAL PROPERTY
ADDRESS	777 W ORANGETHORPE AVENUE PLACENTIA, CA 90065
PROJECT NO.	DATE SAMPLED
092878	6/3/21
REFERENCE:	
FIGURE: 1	1st FLOOR (WEST)

TITAN ENVIRONMENTAL SOLUTIONS
1521 E. Orangethorpe Ave, Suite B
Fullerton, CA 92831
Phone: (714) 871-8711



LEGEND

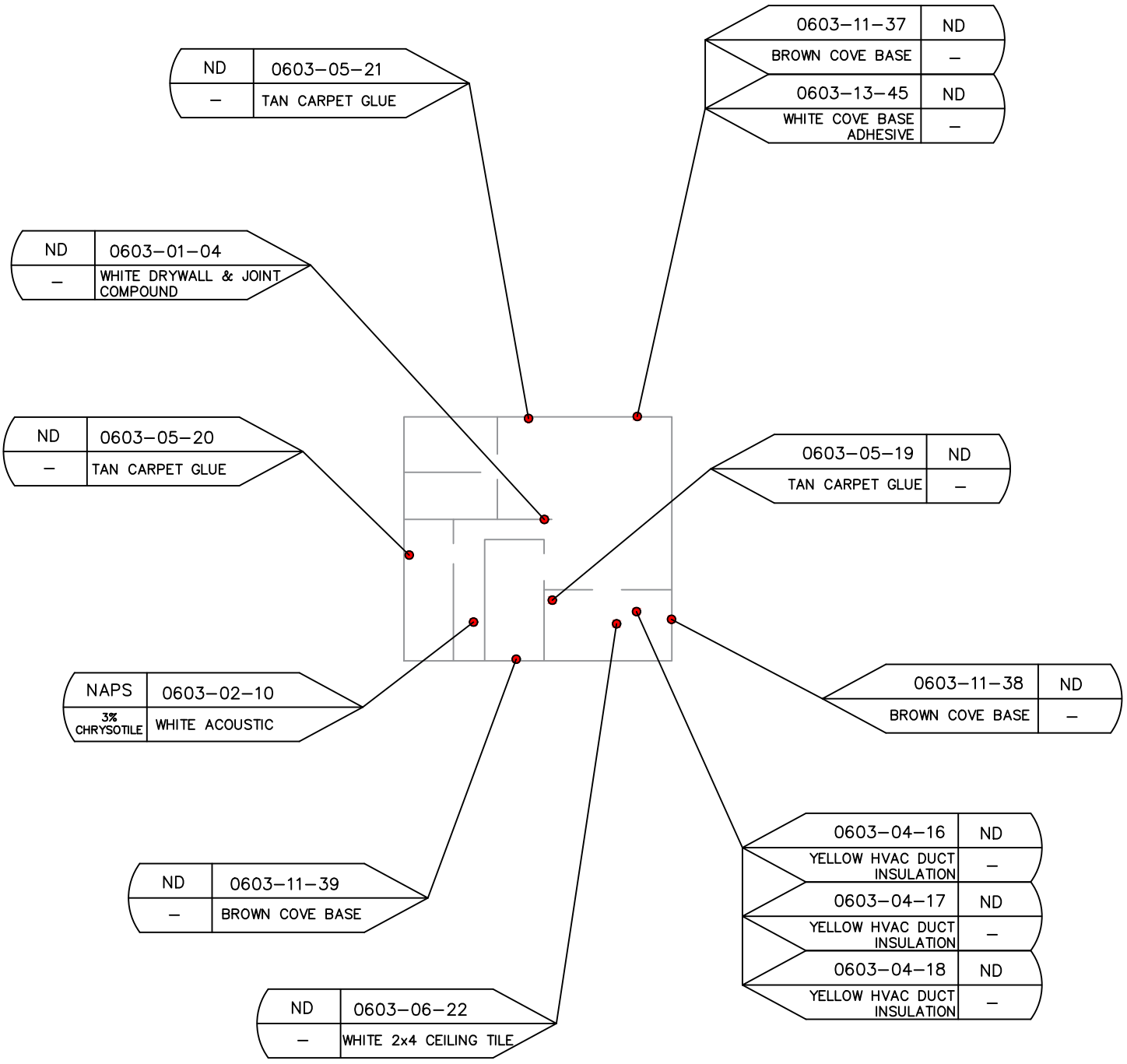
SAMPLE IDENTIFICATION — SAMPLE RESULT

MATERIAL DESCRIPTION/ LAYER — PERCENTAGE OF ASBESTOS

ND	NOT DETECTED
NAPS	NOT ANALYZED,POSITIVE STOP
P	POSITIVE

PROJECT NAME	COMMERCIAL PROPERTY
ADDRESS	777 W ORANGETHORPE AVENUE PLACENTIA, CA 90065
PROJECT NO.	DATE SAMPLED
092878	6/3/21
REFERENCE:	
FIGURE: 1	2nd FLOOR (EAST)

TITAN ENVIRONMENTAL SOLUTIONS
1521 E. Orangethorpe Ave, Suite B
Fullerton, CA 92831
Phone: (714) 871-8711



LEGEND

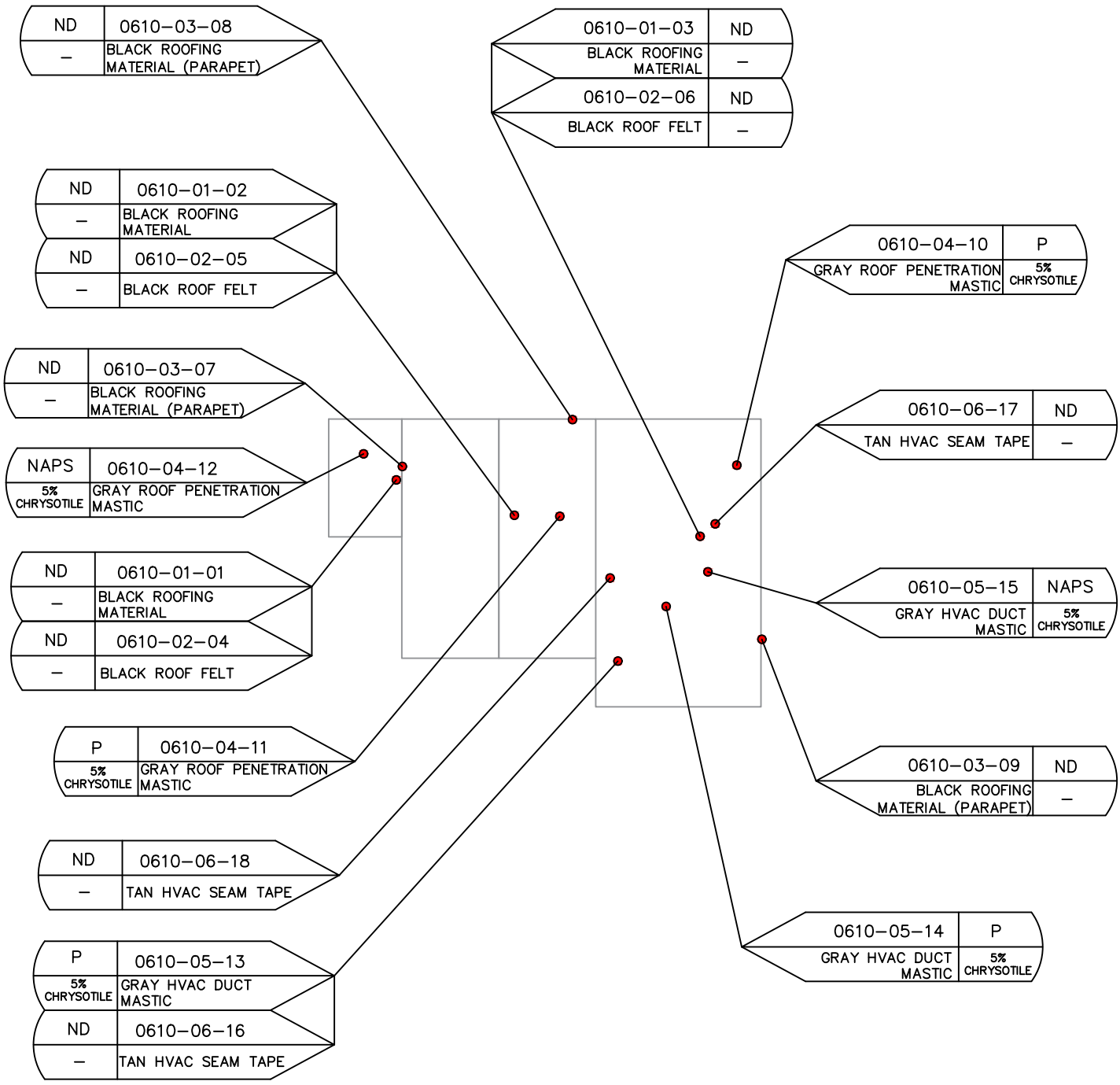
SAMPLE IDENTIFICATION — SAMPLE RESULT

MATERIAL DESCRIPTION/ LAYER — PERCENTAGE OF ASBESTOS

ND	NOT DETECTED
NAPS	NOT ANALYZED,POSITIVE STOP
P	POSITIVE

PROJECT NAME	COMMERCIAL PROPERTY
ADDRESS	777 W ORANGETHORPE AVENUE PLACENTIA, CA 90065
PROJECT NO.	DATE SAMPLED
092878	6/3/21
REFERENCE:	
FIGURE: 3	2nd FLOOR

TITAN ENVIRONMENTAL SOLUTIONS
1521 E. Orangethorpe Ave, Suite B
Fullerton, CA 92831
Phone: (714) 871–8711



LEGEND

SAMPLE IDENTIFICATION — SAMPLE RESULT

MATERIAL DESCRIPTION/ LAYER — PERCENTAGE OF ASBESTOS

ND	NOT DETECTED
NAPS	NOT ANALYZED,POSITIVE STOP
P	POSITIVE

N

PROJECT NAME	COMMERCIAL PROPERTY
ADDRESS	777 W ORANGETHORPE AVENUE PLACENTIA, CA 90065
PROJECT NO.	DATE SAMPLED
092878	6/10/21
REFERENCE:	
FIGURE: 4	ROOF

TITAN ENVIRONMENTAL SOLUTIONS
1521 E. Orangethorpe Ave, Suite B
Fullerton, CA 92831
Phone: (714) 871-8711

ATTACHMENT IV

Inspector Certification(s)

State of California
Division of Occupational Safety and Health

Certified Site Surveillance Technician

Peter Barela
Name

Certification No. 17-6032

Expires on 09/12/21

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

STATE OF CALIFORNIA
DEPARTMENT OF PUBLIC HEALTH

LEAD-RELATED CONSTRUCTION CERTIFICATE

INDIVIDUAL:	CERTIFICATE TYPE:	NUMBER:	EXPIRATION DATE:
 **Peter Barela**	Lead Sampling Technician	LRC-00000588	5/2/2022

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

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

Robert B Menald
Name

Certification No. 08-4323

Expires on 01/17/22

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

California Department of PublicHealth

STATE OF CALIFORNIA
DEPARTMENT OF PUBLIC HEALTH

LEAD-RELATED CONSTRUCTION CERTIFICATE

INDIVIDUAL:	CERTIFICATE TYPE:	NUMBER:	EXPIRATION DATE:
	Lead Inspector/Assessor	LRC-00005260	2/20/2022
	Lead Project Monitor	LRC-00005259	2/20/2022

Robert Menald

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

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

Ibrahim M Sobeih
Name

Certification No. 06-4078

Expires on 10/18/21

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