

Limited Asbestos & Lead-Based Paint Survey Report *Renovation, Commercial Property*

Site: 74 West 6th Street, Gilroy, California

S Tech Project: 20165

Prepared for: South Santa Clara Valley Memorial District

November 6, 2020

S Tech Consulting was retained by South Santa Clara Valley Memorial District to conduct a limited pre-renovation asbestos and lead-based paint survey of the commercial facility, located at 74 West 6th Street in Gilroy, California. The restrooms in the facility will be upgraded as part of this improvement project. Due to the age of the facility, the planned improvements will impact suspect asbestos containing materials and lead-based paints.

Prior to conducting renovation or demolition, the EPA and Cal-OSHA require the sampling of building materials to determine whether asbestos is present. When asbestos is identified and will be disturbed, it must be handled and disposed of by trained and licensed personnel, to prevent the creation of an airborne asbestos hazard. Lead paint is regulated by EPA and OSHA to prevent creating a lead exposure hazard for workers and especially children.

The site visit took place on November 5, 2020 by Sean Tillema, a DOSH Certified Asbestos Consultant (CAC 07-4257), and California Department of Public Health Certified Lead Related Construction Inspector / Risk Assessor (LRC-2901).

Scope of Work & Property Description

Our scope of work was limited to testing specific interior components that will be impacted by the upcoming renovation work, as directed by the client. This was not a comprehensive assessment of all suspect materials associated with the property. Our assessment was in accordance with the requirements of the Bay Area Air Quality Management District (BAAQMD). Lead testing was for compliance with Cal-OSHA Lead in Construction's standard.

The subject structure is a single-story commercial building, constructed in the 1950s, on a slab on grade foundation. The assessment area included the men's and women's restrooms, the utility room, the hallway, and the attic space. The restrooms will be upgraded as part of this improvement project.

Interior walls and ceilings within the assessment area include plaster with a button board backing. Flooring includes terra-cotta pavers and bare concrete throughout the work area.

Climate control for the building is provided by a newer forced air system.

The attic is insulated with fiberglass insulation.



Asbestos Containing Materials

[Asbestos-containing material \(ACM\)](#) is defined by the United States Environmental Protection Agency (EPA) as material containing **more than one percent asbestos** as determined by Polarized Light Microscopy (PLM). In California, for contractor licensing and employee protection, the California Department of Occupational Safety and Health (Cal-OSHA) classifies any material as having greater than one tenth of one percent (>0.1%) asbestos as [Asbestos-Containing Construction Material \(ACCM\)](#). Asbestos containing material are divided into friable and non-friable classifications. Friability refers to the likelihood of the material readily releasing airborne fibers when disturbed. Materials which are non-friable in-situ have the potential to become friable when deteriorated or when renovation or demolition occurs.

The following conclusions were arrived at from the field inspection and the analytical results:

- * **In the utility room, there is an asbestos cement (Transite) flue pipe. Transite is classified as a Category II, Non-Friable Asbestos Containing Material (ACM) so long as it can be removed substantially intact. There is one pipe, approximately 12 lineal feet.**

Analysis was performed by AmeriSci Los Angeles, a NVLAP accredited laboratory, on an expedited laboratory turnaround time. Twelve samples were collected and submitted to the laboratory. Once at the lab, the submitted samples required no further separation. The table below is a summary of materials identified to contain asbestos. Following the summary table, is a listing of all materials collected from the site, with samples in red containing asbestos. The laboratory report is attached at the end of this document. See the summary for additional information.

Asbestos Summary Table				
Asbestos Material	Locations	Analytical Results	Classification	Approximate Quantity to be Removed
Transite Flue Pipe	Utility Room (Water Heater Flue)	Assumed	Category II Non-Friable, ACM	12 LF

Asbestos Containing Materials - continued

Asbestos Bulk Sample Table			
Sample Number	Material Sampled	Sample Location	Analytical Results NAD = No Asbestos Detected
165 - 1	CMU Block Wall	Hallway	NAD
165 - 2	Floor Paver	Hallway	NAD
165 - 3	Floor Paver Grout	Hallway	NAD
165 - 4	Floor Paver Adhesive - White	Hallway	NAD
165 - 5	Floor Paver Mortar	Hallway	NAD
165 - 6	Plaster	Utility	NAD
165 - 7	Button Board	Utility	NAD
165 - 8	Plaster	Men's Restroom	NAD
165 - 9	Button Board	Men's Restroom	NAD
165 - 10	Insulation	Attic	NAD

Asbestos Containing Materials - continued

Asbestos Bulk Sample Table			
Sample Number	Material Sampled	Sample Location	Analytical Results NAD = No Asbestos Detected
165 - 11	Plaster	Women's Restroom	NAD
165 - 12	Button Board	Women's Restroom	NAD

Lead-Based Paint & Glazings

Lead-Based Paint (LBP), as defined by EPA, is of concern both as a source of direct exposure through ingestion of paint chips, and as a contributor to lead interior dust and exterior soil. Lead was widely used as a major ingredient in most interior and exterior oil-based paints prior to 1950. Lead compounds continued to be used as corrosion inhibitors, pigments and drying agents from the early 1950's. In 1972, the Consumer Products Safety Commission limited lead content in new paint to 0.5% (5000 ppm) and, in 1978, to 0.06% (600 ppm). **Today, for purposes of lead-based paint inspection, for childhood lead poisoning prevention, EPA defines LBP as paint containing greater than 0.5% (5000 ppm) lead by weight or greater than 1.0 mg/cm² by surface area. This report applies the 1.0 mg/cm² reference standard, which applies to X-ray Fluorescence (XRF) testing.**

The State of California has enacted a number of regulations to minimize lead exposure in children and adults. Specifically, [Title 17, California Code Of Regulations, Division 1, Chapter 8 Accreditation, Certification, and Work Practices For Lead-Based Paint and Lead Hazards](#) and a number of California Civil and Health and Safety Codes, provide requirements for lead-safe housing and the prevention of lead hazards from developing in housing. A complete list of all State of California LBP regulations is available at the [CDPH Childhood Lead-Poisoning Prevention Branch website](#). The California Department of Public Health (CDPH) is the agency responsible for enforcing compliance with existing state LBP regulations.

For occupational lead exposure in the construction and building maintenance industries, lead is regulated below the threshold set by the EPA for lead-based paint. Additionally, OSHA does not limit lead health and safety requirements to paint. Many other building materials and manufactured items are known to contain lead. Adult occupational tasks may result in exposure to lead even when working with low lead concentrations. Tasks such as abrasive blasting, flame torch usage, and mechanical grinding are especially prone to occupational lead exposure. When lead is present in any concentration, Cal-OSHA, under Title 8 CCR Section 1532.1, requires employers to evaluate the task performed and conduct an exposure assessment. Based on the results of the exposure assessment, engineering controls and personal protective equipment may be necessary to reduce occupational lead exposure. Additional information is available from this Cal-OSHA fact sheet: http://www.dir.ca.gov/dosh/dosh_publications/lead-fct-sheet-rev.pdf

Paint testing at this property was conducted by X-ray Fluorescence (XRF), which provides instant onsite analysis, penetrating all paint layers.

The following conclusions were arrived at from the testing:

- * **EPA defined Lead-Based Paint (>1.0 mg/cm² by XRF) was not identified in any of the coatings anticipated to be impacted by the scope of the renovations.**
- * **Ceramic finishes in the men's restroom contain high lead content in the glazing. Uncontrolled demolition of ceramic finishes has the potential to release lead containing particulate, once the glaze is shattered.**
- * **For the purposes of compliance with the Cal-OSHA 8 CCR 1532.1 'Lead in Construction Standard', when disturbing any amount of lead, in any material, the employer must ensure their employees are not exposed to lead in excess of the Action Level (AL) or Permissible Exposure Limit (PEL). Contractors must have historical exposure data on file for the task performed or they must conduct an exposure assessment on representative workers. Engineering controls and personal protective equipment (PPE) must be utilized where exposure data dictates. Tasks that are likely to create high lead exposure are abrasive blasting, flame torching, and mechanical grinding.**

The table on the following page is a summary of components identified to contain high lead content. Following the summary table is a table listing the results of all the components tested. See summary for additional information.

Lead-Based Paint - continued

The table below lists the components identified coated with high lead content at the subject building. *EPA Lead-Based Paint is lead content in excess of 5,000 ppm by bulk analysis or greater than 1.0 mg / cm² by XRF. Note, lead in any amount may be regulated by Cal-OSHA for worker protection.*

Lead (Pb) Summary Table				
Location	Component	Substrate	Analytical Results XRF: mg/cm²	Classification
Men's Restroom	Shower Wall & Ceiling Tile	Ceramic	>5.00	High Lead Content

Lead-Based Paint - continued

The table below lists the painted and/or glazed components tested as part of this assessment. *EPA Lead-Based Paint is lead content in excess of 5,000 ppm by bulk analysis or greater than 1.0 mg/cm² by XRF. Note, lead in any amount may be regulated by Cal-OSHA for worker protection.*

Lead (Pb) Content by X-ray Fluorescence			
Area	Component	Substrate	Lead Content mg/cm²
Hallway	Floor Paver	Clay	<0.01
Hallway	Wall	CMU	<0.01
Hallway	Wall	CMU	<0.01
Men's Restroom	Wall	Plaster	0.28
Men's Restroom	Floor Paver	Clay	<0.01
Men's Restroom	Wall	Clay	<0.01
Men's Restroom	Door Frame	Wood	0.18
Men's Restroom	Toilet Partition	Metal	<0.01
Men's Restroom	Sink Glazing	Porcelain	0.02
Men's Restroom	Urinal	Porcelain	0.04
Men's Restroom	Toilet	Porcelain	<0.01
Men's Restroom	Shower Wall Tile	Ceramic	>5.00
Men's Restroom	Cabinet	Wood	<0.01
Men's Restroom	Door	Wood	0.05

Lead-Based Paint - continued

The table below lists the painted and/or glazed components tested as part of this assessment. *EPA Lead-Based Paint is lead content in excess of 5,000 ppm by bulk analysis or **greater than 1.0 mg/cm² by XRF**. Note, lead in any amount may be regulated by Cal-OSHA for worker protection.*

Lead (Pb) Content by X-ray Fluorescence			
Area	Component	Substrate	Lead Content mg/cm ²
Men's Restroom	Ceiling	Plaster	0.21
Women's Restroom	Wall	Plaster	0.51
Women's Restroom	Door	Wood	0.09
Women's Restroom	Door Frame	Wood	0.14
Women's Restroom	Floor Paver	Clay	<0.01
Women's Restroom	Toilet Partition	Metal	0.01
Women's Restroom	Sink	Porcelain	0.02
Women's Restroom	Toilet	Porcelain	<0.01

Summary of Findings

Asbestos

When conducting renovation or demolition, A State of California [C-22](#) Licensed Asbestos Abatement Contractor who is Division of Occupational Safety & Health (DOSH) registered, must be retained when disturbing materials containing greater than 0.1% asbestos ([Asbestos Containing Construction Material](#)). All work must be conducted in strict accordance with Cal-OSHA's asbestos standard, [8 CCR 1529](#) and the requirements of the Bay Area Air Quality Management District (BAAQMD) Rule 11. Waste must be disposed of in the correct landfill for the classification of asbestos being removed.

Demolition of load bearing walls requires the submittal of a demolition notification to the Bay Area Air Quality Management District (BAAQMD) a minimum of ten working days prior to beginning demolition activities. If such work will occur on this project, a 'J' number must be issued by the BAAQMD to allow the demolition to proceed. A copy of this survey report must be submitted with the demolition notification and should remain onsite during the course of the demolition related work.

Quantities provided in this report are estimates and will be field verified by any contractor proposing to conduct asbestos removal on this project.

Contractors should be aware that concealed spaces may harbor additional suspect material. Asbestos cement pipes may be concealed within wall cavities and found in underground utility pipes. Should any additional suspect materials be identified during the course of the demolition work, stop work and contact us to assess and sample if necessary.

Lead

Lead-Based Paint was not identified in any of the coatings expected to be impacted by the scope of the renovations. No further action is required with regards to LBP.

Ceramic tile applications, where high lead content was identified, can release lead particulate during demolition activities, creating a lead exposure risk hazard for building employees and contract staff. Lead-safe work practices should be implemented during ceramic tile removal to ensure lead particulate is appropriately contained. HEPA vacuums should be used when conducting cleaning after demolition work. All wastes must be appropriately disposed of.

For the purposes of compliance with the Cal-OSHA [8 CCR 1532.1](#) 'Lead in Construction Standard', when disturbing any amount of lead, in any material, the employer must ensure their employees are not exposed to lead in excess of the Action Level (AL) or Permissible Exposure Limit (PEL). Contractors must have historical exposure data on file for the task performed or they must conduct an exposure assessment on representative workers. Engineering controls and personal protective equipment (PPE) must be utilized where exposure data dictates. Tasks that are likely to create high lead exposure are abrasive blasting, flame torching, and mechanical grinding. Employers not familiar with the requirements of the Lead in Construction standard can download a brief Cal-OSHA fact sheet by following this link http://www.dir.ca.gov/dosh/dosh_publications/lead-fct-sheet-rev.pdf.

This was a limited survey focusing on specific locations and materials. Other suspect materials may be present on a property of this age. If the scope of work expands, suspect materials must be tested prior to disturbing.

If you have any questions please feel free to call us at 831.883.8415

S Tech Consulting



Sean P. Tillema

**DOSH Certified Asbestos Consultant (CAC) #07-4257
Certified Lead Inspector / Risk Assessor #LRC-2901**

Limitations

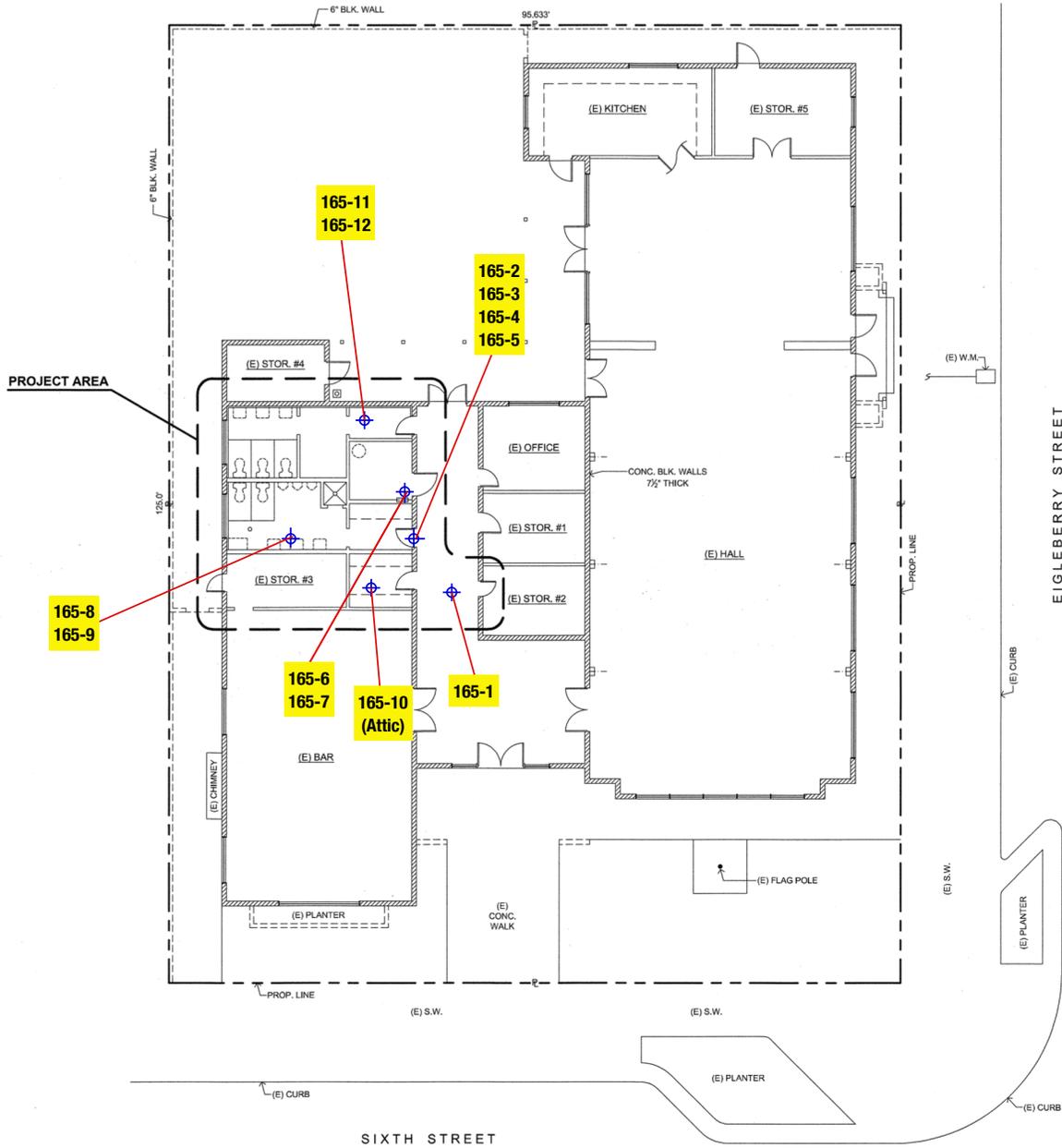
This report is not intended to identify all hazards or unsafe conditions or to imply that others do not exist. This survey was planned and implemented on the basis of a mutually agreed scope of work and S Tech's experience in performing this type of assessment.

Areas outside our scope or inaccessible areas are excluded from this report. This was not a survey of the entire property.

S Tech Consulting has performed this survey in a professional manner using the degree of skill and care exercised for similar projects under similar conditions, by reputable and competent environmental consultants. S Tech Consulting shall not be responsible for conditions or consequences arising from relevant facts that were concealed, withheld, or not fully disclosed at the time that this survey was conducted.

S Tech Consulting further states that no warranties, expressed or implied, are made regarding the quality, fitness, or results to be achieved as a consequence of this report or impacted by information not properly disclosed to S Tech at the time of this report. It further states that no responsibility is assumed for the control or correction of conditions or practices existing at the premises of the client.

Site Plan & Asbestos Sample Locations



EXISTING FLOOR / SITE PLAN

1/8" = 1'-0"



- ▽ Indicates Exterior Sample Location
- ⊕ Indicates Interior Sample Location



DATE PREPARED: 11/6/20	SOURCE: DAVCO ASSOCIATES
REVISION:	REVISION DATE:
PROJECT NO: 20165	SCALE: NTS

DRAWING TITLE:
Asbestos Site Sample Location Plan

PROJECT NAME:
74 West 6th Street, Gilroy, California

CLIENT:
South Santa Clara Valley Memorial District

FIGURE NO. **1**

Selected Site Photos



Utility Room - Transite Flue Pipe (Water Heater Flue)



Men's Restroom - Shower Tile With High Lead Content

Laboratory Analytical Report



Please Reply To:

AmeriSci Los Angeles

24416 S. Main Street, Ste 308

Carson, California 90745

TEL: (310) 834-4868 • FAX: (310) 834-4772

FACSIMILE TELECOPY TRANSMISSION

To: Sean Tillema
STech Consulting LLC

From: Dennis Liu
AmeriSci Job #: 920111093

Fax #:

Subject: PLM 6 hour Results
Client Project: 20165; South Santa Clara Valley
Memorial District; 74 W. 6th Street
Gilroy Cal

Email: Sean@stechconsulting.com,consultingstech@gmail.com,
om,david@stechconsulting.com

Date: Friday, November 6, 2020

Time: 14:03:52

Number of Pages: _____
(including cover sheet)

Comments:

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PLM Bulk Asbestos Report

STech Consulting LLC
Attn: Sean Tillema
484B Washington Street, #401
Monterey, CA 93940

Date Received 11/06/20 **AmeriSci Job #** 920111093
Date Examined 11/06/20 **P.O. #**
Page 1 of 3
RE: 20165; South Santa Clara Valley Memorial District; 74 W. 6th Street Gilroy California

Client No. / HGA	Lab No.	Asbestos Present	Total % Asbestos
165-1 Location: CMU Block Wall / Hallway Analyst Description: Grey/Pink, Heterogeneous, Non-Fibrous, Cementitious, CMU Asbestos Types: Other Material: Non-fibrous 100 %	920111093-01	No	NAD (by CVES) by Dennis Liu on 11/06/20
165-2 Location: Floor Paver / Hallway Analyst Description: Red, Heterogeneous, Non-Fibrous, Cementitious, Flooring Asbestos Types: Other Material: Non-fibrous 100 %	920111093-02	No	NAD (by CVES) by Dennis Liu on 11/06/20
165-3 Location: Floor Paver - Grout / Hallway Analyst Description: Grey/Red, Heterogeneous, Non-Fibrous, Cementitious, Flooring Asbestos Types: Other Material: Non-fibrous 100 %	920111093-03	No	NAD (by CVES) by Dennis Liu on 11/06/20
165-4 Location: Floor Paver - Adhesive - White / Hallway Analyst Description: White, Homogeneous, Non-Fibrous, Adhesive Asbestos Types: Other Material: Non-fibrous 100 %	920111093-04	No	NAD (by CVES) by Dennis Liu on 11/06/20
165-5 Location: Floor Paver - Mortar / Hallway Analyst Description: Grey, Heterogeneous, Non-Fibrous, Cementitious, Mortar Asbestos Types: Other Material: Non-fibrous 100 %	920111093-05	No	NAD (by CVES) by Dennis Liu on 11/06/20

PLM Bulk Asbestos Report

20165; South Santa Clara Valley Memorial District; 74 W. 6th
Street Gilroy California

Client No. / HGA	Lab No.	Asbestos Present	Total % Asbestos
165-6 Location: Plaster / Utility Room Analyst Description: White, Heterogeneous, Non-Fibrous, Plaster Asbestos Types: Other Material: Non-fibrous 100 %	920111093-06	No	NAD (by CVES) by Dennis Liu on 11/06/20
165-7 Location: Button Board / Utility Room Analyst Description: Brown/White, Heterogeneous, Fibrous, Button Board Asbestos Types: Other Material: Cellulose 20 %, Non-fibrous 80 %	920111093-07	No	NAD (by CVES) by Dennis Liu on 11/06/20
165-8 Location: Plaster / Mens Restroom Analyst Description: White, Heterogeneous, Non-Fibrous, Plaster Asbestos Types: Other Material: Non-fibrous 100 %	920111093-08	No	NAD (by CVES) by Dennis Liu on 11/06/20
165-9 Location: Button Board / Mens Restroom Analyst Description: Brown/White, Heterogeneous, Fibrous, Button Board Asbestos Types: Other Material: Cellulose 20 %, Non-fibrous 80 %	920111093-09	No	NAD (by CVES) by Dennis Liu on 11/06/20
165-10 Location: Insulation / Attic Analyst Description: Yellow, Heterogeneous, Fibrous, Insulation Asbestos Types: Other Material: Fibrous glass 90 %, Non-fibrous 10 %	920111093-10	No	NAD (by CVES) by Dennis Liu on 11/06/20
165-11 Location: Plaster / Women's Restroom Analyst Description: White, Heterogeneous, Non-Fibrous, Plaster Asbestos Types: Other Material: Non-fibrous 100 %	920111093-11	No	NAD (by CVES) by Dennis Liu on 11/06/20

Client Name: STech Consulting LLC

PLM Bulk Asbestos Report

20165; South Santa Clara Valley Memorial District; 74 W. 6th Street Gilroy California

Client No. / HGA	Lab No.	Asbestos Present	Total % Asbestos
165-12	920111093-12	No	NAD
Location: Button Board / Women's Restroom			(by CVES) by Dennis Liu on 11/06/20
Analyst Description: Brown/White, Heterogeneous, Fibrous, Bulletin Board Asbestos Types: Other Material: Cellulose 20 %, Non-fibrous 80 %			

Reporting Notes:

Analyzed By: Dennis Liu ; Date Analyzed: 11/6/2020 11-6-20

*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: 

9201110913

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Date: 11-5-20	Project: 20165
Client: South Santa Clara Valley Memorial District	CAC/CSST: Sean Tillema
Site: 74 W. 6th Street, Gilroy, California	

Asbestos Bulk Sample Log

Sample #	Material	Sample Location	Condition	Frable
105-1	Cmu Block wall	Hallway	C	NF
-2	Floor Paver			
-3	Grout			
-4	Adhesive - white			
-5	Mortar			
-6	Plaster	Utility Room		NF
-7	Bottom Board			NF
-8	Plaster	Mens Restroom		
-9	Bottom Board			
-10	Insulation	Athc		F
-11	Plaster	Women's Restroom		NF
-12	Bottom Board			NF

Turn Around Requested: Rush

Analysis: PLM

Results to: Sean@stechconsulting.com

Chain of Custody (COO)

Relinquished by: ST Date: 11-5-20 Time: 15:00

Received by: SM Date: 11/6/20 Time: 10:10

Page 1 of 1