

NorBay Consulting

LOGICAL

ENVIRONMENTAL

SOLUTIONS

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October 15, 2020

Mr. Will McManus
c/o San Rafael City Schools
310 Nova Albion Way
San Rafael, CA 94903

**SUBJECT: LIMITED ASBESTOS AND LEAD INSPECTION
TERRA LINDA HIGH SCHOOL (ARCHWAY)
SAN RAFAEL, CALIFORNIA**

Dear Mr. McManus:

NorBay Consulting is pleased to provide the analytical results from the limited pre-renovation asbestos and lead inspection conducted of the archway near the front entrance to the main building on the campus of Terra Linda High School in San Rafael, California.

The inspection included the visual observation of suspect asbestos containing stucco, collection of stucco samples to determine asbestos content, if any, laboratory analysis, the collection of lead in paint readings utilizing a RMD direct reading instrument and generation of a final report.

NorBay Consulting appreciates the opportunity to provide you with these services. If you have any questions regarding this report or if you require additional information please do not hesitate to contact me at (415) 507-9786.

Respectfully,
NORBAY CONSULTING

Bob Gerhold

Bob Gerhold
Certified Asbestos Consultant # 92-0157
CDPH Lead Inspector/Assessor LRC-1004

EXECUTIVE SUMMARY

NorBay Consulting conducted a limited pre-renovation asbestos and lead inspection of the archway on the campus of Terra Linda High School in San Rafael, California. Mr. Bob Gerhold, Cal-OSHA Certified Asbestos Consultant #92-0157 and CDPH Lead Inspector/Assessor LRC-1004 conducted the inspection on October 10, 2020.

This Executive Summary is provided solely for the purpose of overview. Any party who relies on this report must read the entire report. The Executive Summary may have omitted important details, any of which could be crucial to the proper understanding and risk assessment of the subject matter.

A total of five (5) samples of suspect asbestos containing building materials were collected during the inspection. Upon analysis by Polarized Light Microscopy (PLM) the following material(s) were found to contain varying percentages of asbestiform minerals or are materials known to contain asbestos.

- ◆ None.

A total of six (6) readings were collected of interior painted/coated surfaces during the inspection. In addition, six (6) calibration readings were also collected. For this report lead based paint includes readings ≥ 1.0 mg/cm², lead-containing paint includes readings ≥ 0.1 to ≤ 1.0 mg/cm² and no lead detected includes readings of 0.0 mg/cm². It is extremely important to understand that XRF readings, which have a value of 0.0 mg/cm², do not necessarily mean there is “no lead present” but rather the level is below what the instrument can read.

Lead based paint/glazing was located on the following components:

- ◆ None.

However, the blue paint on the stucco and the concrete base was found to be coated with detectable levels of lead. Disturbance of these components would be subject to CAL-OSHA lead and construction standard requirements.

A more detailed presentation of procedures and findings is presented in the body of this report. Also included is a discussion of recommendations and regulatory considerations.

ASBESTOS SURVEY PROCEDURES

Homogeneous areas of materials, which were suspected of containing asbestos were identified. A homogeneous area, for bulk sampling purposes, is one that seems by texture, color and wear to be uniform and applied during the same general time period. After the homogeneous areas had been identified, representative bulk sample(s) are collected for laboratory analysis. Because asbestos-containing building materials have compositional variability, it is possible to obtain different laboratory results for samples from the same homogeneous area. Therefore, a homogeneous area with at least one positive sample for will result in the entire homogeneous area being designated as an asbestos containing material.

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The sampling strategy was partially based on guidelines established by the Environmental Protection Agency (EPA) for school buildings (40 CFR Part 763, AHERA) which require that samples be collected from each homogeneous area of suspected ACM. Upon completion of the inspection and bulk sampling, the samples were delivered under chain of custody protocol to SGS Forensic Laboratories of Hayward, California for analysis by Polarized Light Microscopy (PLM).

SAMPLE ANALYSIS

Bulk samples were examined by Polarized Light Microscopy (PLM) in accordance with EPA Test Method 600/R-93/116, "Method for the Determination of Asbestos in Bulk Building Materials". The percentage of asbestos is determined by visual estimation. Laboratory results are reported based on the percentage of asbestiform minerals identified within each sample layer. The lower limit of reliable detection by PLM is 1% by volume. When asbestos or other minerals are observed in concentrations believed to be less than the reliable detection limit (less than 1%) the results are usually indicated as TRACE.

Upon analysis the analytical results are compared to government agency standards. Currently, both the California Occupational Safety and Health Administration (Cal-OSHA) and the Environmental Protection Agency (EPA) define material which contains more than one percent asbestos to be an asbestos containing material (ACM). In addition, Cal-OSHA defines any manufactured construction material containing more than 0.1% by weight as asbestos containing construction materials (ACCM). Cal-OSHA also requires notification and registration of the contractor when disturbing materials with more than one-tenth of one percent and regulates worker protection whenever materials containing any detectable levels of asbestos are to be disturbed.

RESULTS

Analytical results can be found in the following table

Sample ID	Material	Location	Results
Stucco-1	Stucco	Exterior, archway	No Asbestos Detected
Stucco-2	Stucco	Exterior, archway	No Asbestos Detected
Succo-3	Stucco	Exterior, archway	No Asbestos Detected
Concrete-1	Concrete	Exterior, archway, foundation	No Asbestos Detected
Concrete-2	Concrete	Exterior, archway, foundation	No Asbestos Detected

REGULATORY CONSIDERATIONS

Current EPA National Emissions Standards for Hazardous Air Pollutants (NESHAP) regulations require that most ACM be removed prior to demolition or renovation activities. Other regulations apply to construction activities and notification requirements for projects involving ACM/ACCM. At both the federal and state levels, these include, but are not limited to Federal OSHA regulation 29 CFR 1910 and 1926, the California Health Code, California OSHA 8 CCR 1529 and

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Proposition 65 which requires the posting of notifications when a facility is known to contain toxic substances found on the governors list. As previously mentioned in this report both the California Occupational Safety and Health Administration (Cal-OSHA) and the Environmental Protection Agency (EPA) define material which contains more than one percent asbestos to be an asbestos containing material (ACM). However, Cal-OSHA has an additional classification for manufactured materials found to contain asbestos in quantities between 0.1% to 1%. This classification is referred to as Asbestos Containing Construction Materials (ACCM).

Analytical results indicated that neither of the materials sampled contained asbestos thus there appears to be no asbestos impacts involved with this portion of the project.

LEAD IN PAINT XRF SURVEY PROCEDURES

The sampling strategy employed by NorBay Consulting was performed as outlined in Title 17, California Code of Regulations, Division 1, Chapter 8 and in accordance with those survey procedures listed in the "Guidelines for the Evaluation and Control of Lead Based Paint Hazards in Housing", June 1995 by the U.S. Department of Housing and Urban Development (HUD). Our investigation included the collection of readings on similar painted surfaces (not every component in every room as dictated by HUD guidelines.)

Prior to data collection, painted/coated surfaces were categorized into distinct area of homogeneity, substrate material, building material and/or distinct paint type. After the items have been identified, a representative reading of the painted/coated surface is collected. Because painted/coated have compositional variability due to one or more paint layers, it is possible to obtain different readings for samples from the same homogeneous area. Therefore, a homogeneous area with at least one XRF reading of 1.0 mg/cm² or greater will result in the entire homogeneous material, substrate and/or distinct paint type being designated as lead based paint. Each XRF reading along with the location, component, substrate, color and condition of the painted/coated surface are included in the XRF readings table located at the end of this report.

SAMPLE ANALYSIS

The XRF testing was performed in accordance with the aforementioned criteria, using an RMD-LPA-1 XRF Analyzer. Exposure times are internally determined by the instrument and are based on a number of factors including lead content, substrate and source strength. The instrument is calibrated to the manufacturer's specifications and was periodically verified against known lead standards produced by the National Institute of Standards and Testing. HUD defines action level as the hazard level or which a corrective response action will be required.

Currently, the most widely used levels for determining lead-based paint (LBP) is 1.0 mg/cm² (as measured by an XRF) established by HUD and adopted by the U.S. Environmental Protection Agency. The action level is 5000 parts per million (pip) or 0.5% by weight when collected paint chip samples are analyzed using atomic absorption spectroscopy (AAS). HUD guidelines consider XRF findings of 1.0 mg/cm² or greater, as lead based paint, which may be a potential hazard.

It is extremely important to understand that XRF readings, which have a value of 0.0 mg/cm², do not necessarily mean there is no lead present but are below what the instrument can detect.

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Positive results can be used to indicate that detectable levels of lead are present, but negative results can not be interpreted as conclusively demonstrating the absence of low levels of lead.

RESULTS

During our investigation a total of six (6) XRF readings were collected of various exterior components. Of the six (6) readings collected, lead-based paint was found in zero (0) of the readings.

Lead based paint/glazing was located on the following components:

- ◆ None.

However, the blue paint on the stucco and the concrete base was found to be coated with detectable levels of lead. Disturbance of these components would be subject to CAL-OSHA lead and construction standard requirements.

For a complete listing of readings see the attached XRF Readings sheet.

REGULATORY CONSIDERATION/RECOMMENDATIONS

Current EPA and HUD guidelines recommend that surfaces containing lead based paint in damaged condition to be considered “lead-based paint hazards” and should be addressed through abatement (permanent removal) or interim controls (temporary). Surfaces containing lead based paints in intact condition should be monitored but are not considered to be “lead based paint hazards”.

At the time of our inspection, the following components were found to contain damaged lead based paints/glazing and are considered a “lead-based paint hazard”.

- ◆ None.

Construction Work Standards

At present, there are no state or federal laws dealing with mandatory abatement following the identification of lead containing or lead based paints prior to disturbance. However, in 1993 the Occupational Safety and Health Administration promulgated legislation (29 CFR 1926.62 and 8 CCR 1532.1) entitled “Lead Exposure in the Construction Industry” which deals with worker exposure to lead.

It should be noted that aside from the HUD definition of lead-based paint (1.0 mg/cm²), OSHA regulates worker protection and work practices on building components containing any detectable amounts of lead. Therefore, components determined to contain less than 1.0 mg/cm² may still be subject to OSHA regulations, if these materials are to be disturbed. This standard essentially states that work, involving components containing any amount of lead must follow certain guidelines. These guidelines include but are not limited to training, personal protective equipment and specific work practices whenever workers disturb lead in any concentration because the disturbance may result in airborne exposures over action or permissible exposure limits. This legislation requires that any task that may potentially expose workers to any concentration of lead

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be monitored to determine workers eight-hour time weighted average (TWA) exposure to lead. Prior to conduction of activities that may generate a lead exposure, such workers must be properly fitted with respiratory protection and protective clothing until eight-hour TWA results reveal exposures within acceptable levels.

Any proposed renovation/demolition, which may involve the removal of building materials with lead-based paint and/or lead containing painted surfaces, should include provisions to minimize the potential for airborne release of lead contaminated dust. It is recommended, as a minimum, that demolition of building materials which have lead-based and/or lead-containing paints be conducted with the materials kept in a wetted state and removed in sections, as feasible, to reduce the potential for airborne lead emissions.

The Federal EPA Renovation, Repair and Painting Rule 40 CFR 745, which became effective April 22, 2010 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/cm² by XRF are covered by this rule.

LIMITATIONS

NorBay Consulting conducted this inspection and prepared this report for the sole and exclusive use of Greystone West Company/San Rafael City Schools, the only intended beneficiaries of our work. NorBay Consulting has performed this inspection in a substantial and workmanlike manner, in accordance with generally accepted methods and practices of the profession, and consistent with that level of care and skill ordinarily exercised by reputable environmental consultants under similar conditions and circumstances.

Enclosed you will find the laboratory reports and chain of custody form for all asbestos bulk samples collected. In addition, a spread sheet of lead readings is attached.

If you have any questions regarding this report or if you require additional information, please do not hesitate to contact me at (415) 507-9786.

Sincerely,
NORBAY CONSULTING

Bob Gerhold

Bob Gerhold
Certified Asbestos Consultant #92-0157
CDPH Lead Inspector/Assessor LRC-1004

Limited Asbestos and Lead Inspection
Terra Linda High School (Archway)
San Rafael, California

**LABORATORY REPORTS AND
CHAIN OF CUSTODY FORMS**

POLARIZED LIGHT MICROSCOPY (PLM)



Bulk Asbestos Analysis

(EPA Method 40CFR, Part 763, Appendix E to Subpart E and EPA 600/R-93-116, Visual Area Estimation)

NVLAP Lab Code: 101459-0

NorBay Consulting
Robert Gerhold
2400 Las Gallinas
Suite 110
San Rafael, CA 94903

Client ID: 3982
Report Number: B309201
Date Received: 10/12/20
Date Analyzed: 10/13/20
Date Printed: 10/13/20
First Reported: 10/13/20

Job ID/Site: Terra Linda H.S., San Rafael, California**SGSFL Job ID:** 3982**Date(s) Collected:** 10/10/2020**Total Samples Submitted:** 5**Total Samples Analyzed:** 5

Sample ID	Lab Number	Asbestos Type	Percent in Layer	Asbestos Type	Percent in Layer	Asbestos Type	Percent in Layer
Stucco-1	12346979						
Layer: Grey Cementitious Material			ND				
Layer: Paint			ND				
Total Composite Values of Fibrous Components:		Asbestos (ND)					
Cellulose (Trace)							
Stucco-2	12346980						
Layer: Grey Non-Fibrous Material			ND				
Layer: Grey Cementitious Material			ND				
Layer: Paint			ND				
Total Composite Values of Fibrous Components:		Asbestos (ND)					
Cellulose (Trace)							
Stucco-3	12346981						
Layer: Grey Cementitious Material			ND				
Layer: Paint			ND				
Total Composite Values of Fibrous Components:		Asbestos (ND)					
Cellulose (Trace)							
Concrete-1	12346982						
Layer: Grey Cementitious Material			ND				
Layer: Paint			ND				
Total Composite Values of Fibrous Components:		Asbestos (ND)					
Cellulose (Trace)							
Concrete-2	12346983						
Layer: Grey Cementitious Material			ND				
Layer: Paint			ND				
Total Composite Values of Fibrous Components:		Asbestos (ND)					
Cellulose (Trace)							

Client Name: NorBay Consulting

Report Number: B309201

Date Printed: 10/13/20

Sample ID	Lab Number	Asbestos Type	Percent in Layer	Asbestos Type	Percent in Layer	Asbestos Type	Percent in Layer
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Tad Thrower, Laboratory Supervisor, Hayward Laboratory

Note: Limit of Quantification ('LOQ') = 1%. 'Trace' denotes the presence of asbestos below the LOQ. 'ND' = 'None Detected'.

Analytical results and reports are generated by SGS Forensic Laboratories (SGSFL) at the request of and for the exclusive use of the person or entity (client) named on such report. Results, reports or copies of same will not be released by SGSFL to any third party without prior written request from client. This report applies only to the sample(s) tested. Supporting laboratory documentation is available upon request. This report must not be reproduced except in full, unless approved by SGSFL. The client is solely responsible for the use and interpretation of test results and reports requested from SGSFL. SGSFL is not able to assess the degree of hazard resulting from materials analyzed. SGS Forensic Laboratories reserves the right to dispose of all samples after a period of thirty (30) days, according to all state and federal guidelines, unless otherwise specified. All samples were received in acceptable condition unless otherwise noted.

NorBay Consulting
2400 Las Gallinas Avenue, Suite 110
San Rafael, CA 94903
(415) 507-9786

Job Site: Terra Linda H.S.
San Rafael, California

Project Number: _____
Analysis Requested: PLM
Turn Around Time: 24 hr.

Client ID	Date	Location	Description
Stucco-1	10/10/2020	Exterior, archway	Stucco
Stucco-2	<u>1</u>	Exterior, archway	Stucco
Stucco-3		Exterior, archway	Stucco
<u>Concrete-1</u>		<u>" , " , foundation</u>	<u>Concrete</u>
<u>Concrete-2</u>		<u>" " "</u>	<u>Concrete</u>

Notes: email results to Bob@norbayca.com, Mike@norbayca.com

<u>Bob Heihold</u>	<u>10/10/2020</u>		
Relinquished by	Date	Relinquished by	Date
Relinquished by	Date	Relinquished by	Date



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San Rafael, California

XRF READINGS

Readings shaded in gray indicate lead based paint

Readings shaded in green indicate lead containing paint

Non-destructive Screening of Exterior Painted Surfaces

XRF Readings

Site Location: Terra Linda High School, San Rafael, California

Building: Archway

Inspector: Bob Gerhold

Date: October 10, 2020[illegible]