



Limited Asbestos Survey and Lead-Based Paint Screening

REPORT DATE: January 9, 2025

PROPERTY INFORMATION

418 North California Street
Stockton, California 95202

PROJECT INFORMATION

AEI Project No. 500681
Site Assessment Date: December 19, 2024

PREPARED FOR

Central Valley Low Income Housing
2431 W. March Lane # 350
Stockton, California 95207

PREPARED BY

AEI Consultants
2500 Camino Diablo
Walnut Creek, California 94597



January 9, 2025

Jon Mendelson
Central Valley Low Income Housing Corporation
2431 W. March Lane #350
Stockton, California 95207

Subject: Limited Asbestos Survey and Lead-Based Paint Screening

Dear Mr. Mendelson,

AEI Consultants is pleased to provide the Limited Asbestos Survey and Lead-Based Paint Screening of the above referenced property. This assessment was authorized and performed in accordance with the scope of services engaged.

We appreciate the opportunity to provide services to you. If you have any questions concerning this report, or if we can assist you in any other matter, please contact me at (925) 746-6016 or jhertz@aeiconsultant.com

Sincerely,

A handwritten signature in purple ink that reads "Justin Hertz". The signature is fluid and cursive, with the first name "Justin" and last name "Hertz" clearly legible.

Justin Hertz
Business Development Manager
(925) 746-6016

TABLE OF CONTENTS

1.0 INTRODUCTION	1
1.1 Scope of Work	1
1.2 Site Specific Survey Limitations	1
1.3 NESHAP and Cal/OSHA Regulations	1
1.4 Cal/OSHA - Asbestos Containing Construction Materials (ACCM):.....	2
2.0 SITE DESCRIPTION	3
3.0 METHODOLOGY	4
3.1 Material Sampling or Investigation	4
3.1.1 Asbestos Sampling Procedures	4
3.1.2 Lead Paint Sampling Procedures	5
3.2 Analytical Methods	5
3.2.1 Asbestos Analysis	5
3.2.2 Lead Paint Analysis	6
3.3 Limitations and Service Constraints.....	6
4.0 SAMPLING AND ANALYSIS	8
4.1 Pre-Demolition Asbestos Survey	8
4.2 Lead-Based Paint Screening	13
5.0 SUMMARY AND RECOMMENDATIONS	14
5.1 Summary of Findings	14
5.2 Recommendations	15
6.0 REPORT RELIANCE.....	16
7.0 SIGNATURE OF ENVIRONMENTAL PROFESSIONALS	17

TABLES

Table 1	Pre-Demolition Asbestos Survey
Table 2	Lead-Based Paint Screening

APPENDICES

Appendix A	Inspector Certifications
Appendix B	Photographic Log
Appendix C	Laboratory Certifications
Appendix D	Laboratory Analytical Reports
Appendix E	Site Sample Location Diagrams

1.0 INTRODUCTION

This report documents the methods and findings of the Limited Asbestos Survey and Lead-Based Paint Screening for the property located at 418 North California Street in Stockton, California. The survey was performed on December 19, 2024, by Mr. Michael J Schoedinger, a representative of AEI. In addition, AEI's scope of work included sampling selected painted surfaces to be analyzed for lead.

1.1 Scope of Work

The purpose of the survey was to locate, identify, sample and assess the condition of building materials suspected of containing greater than one tenth of one percent ($>0.1\%$) asbestos in accordance with Cal/OSHA regulations. In addition, AEI's scope of work included inspecting the building and sampling painted surfaces to be analyzed for lead.

The survey was performed on December 19, 2024, Mr. Michael J Schoedinger, a Certified Asbestos Consultant (CAC #14-5307) and California Department of Public Health (CDPH) Lead Inspector Assessor (LRC-00008102) The asbestos inspection was performed in conformance with modified protocols set forth by the Environmental Protection Agency (EPA) Asbestos Hazard Emergency Response Act (AHERA), the National Emission Standards for Hazardous Air Pollutants (NESHAP) and in accordance with state regulations. The lead inspection was performed in conformance with modified protocols set forth by the Housing for Urban Development (HUD) lead-based paint (LBP) inspection guidelines.

1.2 Site Specific Survey Limitations

The data presented and the opinions expressed in this report are qualified as follows:

- The sole purpose of the investigation and of this report was to assess the Site with respect to asbestos materials and lead-based paint as defined in AEI's Scope of Work and the applicable State, Federal and local environmental laws and regulations.
- The Scope of Services was defined by the requests of the Client, the time and budgetary constraints imposed by the Client, and the availability of access to the Site.
- The collection of bulk building material samples for analysis is a destructive procedure and may cause damage to the integrity of building systems. AEI took normal precautions to minimize damage, however, AEI will not be held responsible for damage to the building systems as a result of sample collection.
- Sampling of the roof and exterior was included in this scope of work.

1.3 NESHAP and Cal/OSHA Regulations

The Code of Federal Regulations (CFR), 40 CFR 61, Subpart M, NESHAP, classifies asbestos-containing material (ACM) as any material or product that contains greater than one percent ($>1\%$) asbestos. As ACM is identified, it is classified as either friable or non-friable.

Friable materials are more hazardous than non-friable materials since they are more likely to release fibers into the air. Friable is defined as any ACM that when dry, can be crumbled, pulverized or reduced to powder by hand pressure. Non-friable ACM is classified as either Category 1 or Category 2 material as follows:

- **Category 1** - Asbestos containing packings, gaskets, resilient floor coverings (including associated floor mastic) and asphalt roofing products containing more than 1% asbestos.
- **Category 2** - All remaining types of non-friable asbestos containing material not included in Category 1 that when dry, cannot be crumbled, pulverized, or reduced to powder by hand pressure.

Regulated asbestos containing materials (RACM), a hazardous waste when friable, is classified as any manufactured material that contains greater than one percent ($>1\%$) asbestos and is:

1. **Friable** - The material can be crumbled, pulverized or reduced to powder by hand pressure;
2. **Category 1** that are subjected to sanding, grinding, cutting or abrading;
3. **Category 1** material that has become friable during renovation activities; or
4. **Category 2** material that has become friable during renovation activities.

Materials containing greater than one percent ($>1\%$) asbestos are subject to the NESHAP regulations (40 CFR Part 61, Subpart M). RACM (friable ACM and non-friable ACM that will become friable during renovation/demolition operations) must be removed from structures prior to renovations or demolitions. Certain non-friable ACM and materials may remain in structures during renovations/demolitions.

With respect to potential worker exposure, notification, and registration requirements, California Division of Occupational Safety and Health (Cal/OSHA) regulations define asbestos-containing construction material (ACCM) as any material with an asbestos content of one tenth of one percent ($>0.1\%$) (Title 8, California Code of Regulations (CCR) § 1529 (p)(1) and (q)(1); Title 8, CCR § 341.6). Typically, removal or disturbance of more than one hundred (100) ft² of ACCM must be performed by a registered asbestos abatement contractor. It is important to note the associated waste labeling is not required if the material contains one percent or less ($\leq 1\%$) asbestos; at concentrations greater than one percent ($>1\%$) all requirements of the standards become effective.

1.4 Cal/OSHA - Asbestos Containing Construction Materials (ACCM):

ACCM means any manufactured construction material which contains more than 1/10th of 1% asbestos by weight.

2.0 SITE DESCRIPTION

The subject property consists of an occupied multifamily apartment building. The Multifamily building is approximately 14,810 sq ft. The interior walls and ceilings are comprised of plaster and drywall. The interior floors are finished with beige vinyl sheet flooring. The roof is comprised of roofing shingles and felt, along with associated roofing mastics.

Select Photographs of the Site and identified suspect building materials are included as **Appendix B** to this report.

3.0 METHODOLOGY

3.1 Material Sampling or Investigation

3.1.1 Asbestos Sampling Procedures

During the survey, AEI visually inspected all readily accessible areas of the subject property and identified homogeneous areas of suspect material (materials that share the same texture, color, use, and appear to have been applied at approximately the same time) and collected representative samples of suspect material for laboratory analysis. The samples collected were placed in plastic bags, sealed, labeled, and transported under chain of custody documentation to an accredited laboratory.

A representative number of samples were collected for each Homogeneous Area in accordance with the following:

The following are the Homogeneous Application symbols which were used for identification during the survey:

T = Thermal System Insulation

M = Miscellaneous Materials

S = Surfacing Materials (Troweled or Spray-Applied)

The minimum number of samples collected and analyzed for each homogeneous material was as specified in the following table. This table was developed based on the AHERA Sampling Protocol (40 CFR 763.86).

Homogeneous Material Type	Number of Samples
Surfacing Materials	Up to 1,000 sq. ft. - 3 Samples 1,001 - 5,000 sq. ft. - 5 Samples 5,001 - 10,000 sq. ft. - 7 Samples Over 10,000 sq. ft. - Minimum 9 Samples
Thermal Systems Insulation	Minimum 3 Samples/Material Type
Miscellaneous Materials	Minimum 3 Samples/Material Type
Patch Materials	Minimum 2 Samples
Previously Sampled Materials	Accepted Positive Sample without Further Collection (Inspector Discretion)

Note: Exceptions to numbers of samples may be made at the discretion of the Inspector (typically for materials with limited quantities).

Bulk material samples were collected in 4-mil plastic bags, or through the use of sample coring devices in sealed plastic tubes and sealed for transport to the laboratory. Each sample collected was assigned its own unique coded number. Samples were collected, analyzed, and stored under strict chain-of-custody protocol.

AEI's approach included a visual assessment of the spaces to locate, as far as practicable, suspect ACM in interior and exterior building or structure locations. Suspect materials were divided into "Homogeneous Areas", building materials which were determined by the inspector to be similar based on their color, texture, and age. In addition, Homogeneous Areas were identified in some cases by function or use, by size, or area/location of the material as well as color, texture, and age or type of material.

Mechanical and electrical equipment including, but not limited to, boilers, HVAC units, refrigeration units, etc. may have internal parts that are asbestos containing. In some cases, these materials where applicable were assumed to contain asbestos where no prior information related to sampling of these materials was provided or due to the inaccessible nature of the materials for sampling. Prior to renovation or demolition, internal components should be inspected or assumed to contain asbestos.

3.1.2 Lead Paint Sampling Procedures

AEI conducted a screening of the building interior to identify building components that may be impacted by the construction activity and may be coated with LBP. The survey was conducted by visually identifying building components that are coated with paint. AEI collected representative samples of suspect LBP (chips), stored each sample in an individual container, and assigned each sample a unique identification number. The paint chip samples were shipped within Chain-of-Custody Protocol to Eurofins EBET Built Environment Testing (Eurofins). Eurofins is an Environmental Lead Laboratory Accreditation Program (ELLAP) accredited laboratory.

3.2 Analytical Methods

Suspect ACM samples collected were transported under Chain of Custody documentation to Eurofins EPK Built Environment Testing, LLC located in Burlingame, California for analysis. Eurofins is accredited by the National Voluntary Laboratory Accreditation Program (NVLAP #200728-0) Laboratory certifications are provided as **Appendix C** of this report.

3.2.1 Asbestos Analysis

All suspect asbestos samples were analyzed using polarized light microscopy (PLM) in accordance with the EPA "Method of Determination of Asbestos in Bulk Samples" (EPA 600/R-93/116, July 1993). This method is referred to as the "Improved Method" and is recommended by EPA as a preferred substitute to the Interim Method EPA 600/M4-82-020, 1982. The laboratory analytical report is included as **Appendix D** to this report. It should be noted that some materials are multi-layered and are inseparable during the bulk sample collection process. Each layer requires specific analysis and reporting by layer (each layer = 1 sample analysis).

In accordance with U.S. EPA guidelines, samples are categorized into "homogeneous groups" by material type. The number of samples to be taken for each group is dictated by the type and quantity of the material. All samples within the homogeneous group must be one percent or less ($\leq 1\%$) asbestos in order to classify the material as "non-asbestos". Conversely, the positive result of any single (1) sample dictates that the Homogeneous Group be classified as ACM. Thus, when the individual samples of each homogeneous group are analyzed, the laboratory will discontinue analysis when asbestos has been identified in one (1) of the samples.

The EPA regulations define ACM as any material with an asbestos content greater than one percent ($>1\%$). However, Cal/OSHA regulations define ACM as any material with asbestos regardless of the

percentage of asbestos fibers. Cal/OSHA and EPA regulations regarding the proper handling of ACMs must be followed for materials containing greater than one percent asbestos. Materials with one percent or less ($\leq 1\%$) asbestos are regulated by Cal/OSHA.

3.2.2 Lead Paint Analysis

Suspect LBP samples collected were sent to Eurofins EPK Built Environment Testing - Tustin (Laboratory ID: LAP-178697) and were analyzed for lead content using Flame Atomic Absorption Spectroscopy (FAAS), following EPA Method SW 846 3050B/7000B.

3.3 Limitations and Service Constraints

- AEI was granted full access within the subject property.
- Due to the hidden nature of some building materials, AEI attempted to access suspect materials for sampling through limited destructive inspection methods.
- The inspection of every space or void (inside walls, ceilings, chases, etc.) within a building structure is not feasible or cost effective. Therefore, reasonable attempts were made to investigate a representative number of locations, which allowed for assumptions to be made regarding typical construction of the investigated building/areas.
- Where concrete substrates were encountered below floor finishes or behind wall finishes, they were considered to be the lowest flooring substrate or outer wall substrate. No coring through identified concrete substrates was performed as part of this survey.
- Mechanical and electrical equipment including, but not limited to, boilers, HVAC units, refrigeration units, etc. may have internal parts that are asbestos-containing. No investigation inside equipment was performed.
- An inspection below grade on the building foundation or other Site areas was not performed as part of AEI's scope of work.
- AEI derived the data in this report primarily from visual inspections, interviews with individuals with information about the Site and a limited number of environmental samples. The passage of time, manifestation of latent conditions, or occurrence of future events may require further exploration at the Site, analysis of the data, and re-evaluation of the findings, observations, conclusions, and recommendations expressed in the report.
- In preparing this report, AEI has relied upon and presumed accurate certain information (or absence thereof) about the Site provided by the Client, and others identified herein. Except as otherwise stated in the report, AEI has not attempted to verify the accuracy or completeness of such information.
- The data reported and the findings, observations, conclusions, and recommendations expressed in the report are limited by the Scope of Services, including the extent of environmental sampling and other tests.
- Asbestos surveys are considered destructive in that the collection of multiple bulk building material samples must be performed for subsequent laboratory analysis and may cause damage to the integrity of building systems. Multiple samples of each suspect building material are collected utilizing hand tools via chipping, cutting, gouging, coring, or scraping. Samples may vary in size depending upon the type of material(s) being collected and the location of the material. Larger samples are sometimes required to access layered materials (i.e., multiple layers of flooring or roofing). Repairs via patching will only be

performed for friable thermal insulation materials. AEI took normal precautions to minimize damage, however, AEI will not be responsible for the minor damage caused by sampling of suspect building materials.

4.0 SAMPLING AND ANALYSIS

4.1 Pre-Demolition Asbestos Survey

A total of thirty-three (33) bulk samples of suspect ACMs were collected from the subject property for laboratory analysis. A total of fifty-seven (57) layers were analyzed following layering of the initial bulk samples during laboratory analysis. Analysis by layer is required for multi-layered materials in accordance with the analytical method.

The Homogeneous Application Designations, Material descriptions and locations, approximate quantities, and sample location descriptions and results are listed in **Table 1** below:

Table 1

Hom. Area ID	Sample ID#	Type of Material	Sample Material Location	Sample Result	NESHAP Category	Approx. Quantity per HA
418 North California Street, Stockton, California						
1	1-1	Plaster Wall/Ceiling - Off-White Plaster	#306 Closet	None Detected	N/A	N/A
1	1-2	Plaster Wall/Ceiling - Off-White Plaster	#312 Closet	None Detected	N/A	
1	1-3	Plaster Wall/Ceiling - Off-White Plaster	3 rd Floor Hallway	None Detected	N/A	
1	1-4	Plaster Wall/Ceiling - Off-White Plaster	#210 Closet	None Detected	N/A	
1	1-5	Plaster Wall/Ceiling - Off-White Plaster	#209 Closet	None Detected	N/A	
1	1-6	Plaster Wall/Ceiling - Off-White Plaster	#212 Closet	None Detected	N/A	

Hom. Area ID	Sample ID#	Type of Material	Sample Material Location	Sample Result	NESHAP Category	Approx. Quantity per HA
418 North California Street, Stockton, California						
2	2-1	Drywall with Texture (Knockdown) - Off-White Texture	#6 Living Room	None Detected	N/A	N/A
		Off-White Drywall with Brown Paper		None Detected		
2	2-2	Drywall with Texture (Knockdown) - Off-White Texture	1 st Floor Hallway	None Detected	N/A	
		Cream Tape		None Detected		
		Off-White Joint Compound		None Detected		
		Off-White Drywall with Brown Paper		None Detected		
2	2-3	Drywall with Texture (Knockdown) - Off-White Texture	#8 Living Room	None Detected	N/A	
		White Tape (Mesh)		None Detected		
		Off-White Drywall with Brown Paper		None Detected		
2	2-4	Drywall with Texture (Knockdown) - Off-White Texture	Laundry Room	None Detected	N/A	
		Yellow Tape (Mesh)		None Detected		
		Off-White Joint Compound with Paint		None Detected		
		Off-White Drywall with Brown Paper		None Detected		
2	2-5	Off-White Texture	Storage/Shop	None Detected	N/A	
		Off-White Drywall with Brown Paper		None Detected		

Hom. Area ID	Sample ID#	Type of Material	Sample Material Location	Sample Result	NESHAP Category	Approx. Quantity per HA
418 North California Street, Stockton, California						
3	3-1	Beige Vinyl Sheet Flooring with 2 nd Layer - Brown/Gray Sheet Flooring	1 st Floor Hall - North Exit	None Detected	N/A	N/A
		Tan Adhesive		None Detected		
3	3-2	Beige Vinyl Sheet Flooring with 2 nd Layer - Brown/Gray Sheet Flooring	2 nd Floor Hall North Exit	None Detected	N/A	
		Tan Adhesive		None Detected		
3	3-3	Beige Vinyl Sheet Flooring with 2 nd Layer - Brown/Gray Sheet Flooring	3 rd Floor Hall East Exit	None Detected	N/A	
		Tan Adhesive		None Detected		
3	3-4	Beige Vinyl Sheet Flooring with 2 nd Layer - Brown/Gray Sheet Flooring	#306 Foyer/Entry	None Detected	N/A	
		Tan Adhesive		None Detected		
		Red-Brown Non-Fibrous Material		None Detected		
4	4-1	Exterior Stucco - Light Gray Stucco	West Exterior	None Detected	N/A	
		Brown/Gray Stucco		None Detected		
4	4-2	Exterior Stucco - Light Gray Stucco	East Exterior	None Detected	N/A	
		Brown/Gray Stucco		None Detected		
4	4-3	Exterior Stucco - Light Gray Stucco	East Exterior	None Detected	N/A	
		Brown/Gray Stucco		None Detected		
5	5-1	White Brick Mortar - White Mortar	North Exterior	None Detected	N/A	N/A
5	5-2	White Brick Mortar - White Mortar	North Exterior	None Detected	N/A	
5	5-3	White Brick Mortar - White Mortar	North Exterior	None Detected	N/A	

Hom. Area ID	Sample ID#	Type of Material	Sample Material Location	Sample Result	NESHAP Category	Approx. Quantity per HA
418 North California Street, Stockton, California						
6	6-1	Roof Shingle with Felt - Black Roofing Shingle with Red and Grey Stones	Roof Vent Sheds	None Detected	N/A	216 sq ft
		Black Roofing Shingle with Grey Stones		None Detected		
		Black Roofing Felt		None Detected		
6	6-2	Roof Shingle with Felt - Black Roofing Shingle with Red and Grey Stones	Roof Vent Sheds	None Detected	N/A	
		Black Roofing Shingle with Grey Stones		None Detected		
		Black Roofing Felt		None Detected		
6	6-3	Roof Shingle with Felt - Black Roofing Shingle with Red and Grey Stones	Roof Vent Sheds	None Detected	N/A	
		Black Roofing Shingle with Grey Stones		None Detected		
		Black Roofing Felt		None Detected		
7	7-1	Black Roof Coating - Black Roofing Material	West Parapet	None Detected	N/A	400 sq ft
7	7-2	Black Roof Coating - Black Roofing Material	West Parapet	None Detected	N/A	
7	7-3	Black Roof Coating - Black Roofing Material	West Parapet	None Detected	N/A	
8	8-1	Tan Roof Caulk - Tan Caulk	North Parapet Cap	None Detected	N/A	46 sq ft
8	8-2	Tan Roof Caulk - Tan Caulk	West Parapet Cap	None Detected	N/A	
8	8-3	Tan Roof Caulk - Tan Caulk	South Parapet Cap	None Detected	N/A	

Hom. Area ID	Sample ID#	Type of Material	Sample Material Location	Sample Result	NESHAP Category	Approx. Quantity per HA
418 North California Street, Stockton, California						
9	9-1	White Roof Caulking - White Caulk	Vent Penetration Boot	None Detected	N/A	3 sq ft
9	9-2	White Roof Caulking - White Caulk	Vent Penetration Boot	None Detected	N/A	
9	9-3	White Roof Caulking - White Caulk	Vent Penetration Boot	None Detected	N/A	

4.2 Lead-Based Paint Screening

AEI collected a total of four (4) samples of suspect paint from the interior painted surfaces at the subject property. Sample IDs, descriptions, locations and results are in the table below:

Table 4 - Paint Chip Analytical Results

Sample #	Description (paint color)	Location of Suspect Materials	Lead Concentration by Parts per Million (ppm)
517 Channel Street, Stockton, California			
L-1	Blue	Metal Door - Roof	280
L-2	White	1 st Floor Hallway	<40
L-3	Beige	2 nd Floor Hallway	230
L-4	Beige	1 st Floor Hallway Drywall	<39

Based upon the analytical results, no lead-based paint (LBP) was identified in the samples collected.

See attached LBP analytical results in **Appendix D**.

The United States Department of Housing and Urban Development (HUD) standard for LBP is 0.5% by weight or 5,000 parts per million (ppm).

The painted surfaces were observed in fair to intact condition and may pose a potential health and safety concern to occupants of the subject property in their current state.

OSHA and Cal/OSHA standards require protection for all workers when working with paint containing lead, regardless of the concentration. A contractor performing paint removal work should follow the OSHA lead standard for the construction industry. The lead content of the paint should be considered when choosing a method to remove the paint, as proper waste disposal requirements and worker protection measures must be taken.

Lead-Containing Paint Compliance Summary

Construction activities (including demolition) that disturb materials or paints containing any amount of lead are subject to certain requirements of the OSHA Safety and Health Regulations for Construction 29 CFR 1926.62. This section applies to all construction work where an employee may be occupationally exposed to lead. All construction work excluded from coverage in the OSHA General Industry Standard for lead by 29 CFR 1910.1025(a)(2) is covered by this standard. Construction work is defined as work for construction, alteration and/or repair, including painting and decorating. It includes but is not limited to the demolition or salvage of structures where lead or materials containing lead are present; Potential hazards exist to workers who remove or cut through lead-containing paint (LCP) during demolition. Dust containing hazardous concentrations of lead may be generated during scraping or cutting materials coated with LCP. Torching of these materials may produce lead oxide fumes. Therefore, air monitoring and/or respiratory protection may be required during the demolition of materials coated with LCP. Guidelines regarding regulatory provisions for construction work where workers may be exposed to lead are presented in 29 CFR 1926.62.

5.0 SUMMARY AND RECOMMENDATIONS

This report documents the methods and findings of the Limited Asbestos Survey and Lead-Based Paint Screening for the property located at 418 North California Street in Stockton, California.

5.1 Summary of Findings

- The materials sampled were determined to not be asbestos-containing materials (ACM, >1%) or asbestos-containing construction materials (ACCM >0.1%).

Lead Results

- Based upon the analytical results, no LBP was identified in the samples collected.

OSHA and Cal/OSHA standards require protection for all workers when working with paint containing lead, regardless of the concentration. A contractor performing paint removal work should follow the OSHA lead standard for the construction industry. The lead content of the paint should be considered when choosing a method to remove the paint, as proper waste disposal requirements and worker protection measures must be taken.

5.2 Recommendations

Based on the results of the Limited Asbestos Survey and Lead-Based Paint Screening, AEI makes the following recommendations:

1. If suspect materials that are not referenced in this report are identified during demolition activities, regulations require, and AEI recommends that the materials be sampled and analyzed to confirm or deny the presence of asbestos prior to disturbance of the materials.
2. An inspection below grade on the building foundation was not performed as part of our scope of work. Prior to disturbance, all building foundations should be inspected for suspect waterproofing materials or other suspect materials.
3. Contractors performing work should be notified that select painted surfaces have identified LBP as identified in the lead sampling table. All other painted surfaces are to be considered LCP under the OSHA regulations and should be handled in accordance with OSHA lead-safe work practices.

6.0 REPORT RELIANCE

Because of the limitations stated above, the findings, observations, conclusions, and recommendations expressed by AEI in this report are limited to the information obtained and the surface and subsurface investigation undertaken and should not be considered an opinion concerning the compliance of any past or current owner(s) or operator(s) of the Site with any Federal, State or local laws or regulations. No warranty or guarantee, whether express or implied, is made with respect to the data reported or findings, observations, conclusions, or recommendations expressed in this report. Furthermore, such data, findings, observations, conclusions and recommendations are based solely upon Site conditions in existence at the time of investigation.

This assessment was performed at the request of the Client, its successors, and assigns ("Client") utilizing methods and procedures consistent with good commercial or customary practices designed to conform with acceptable industry standards. This report may be distributed to and relied upon by Client and its current and future wholly and partially owned subsidiaries, affiliates, successors, and assigns. The independent conclusions represent AEI Consultants' best professional judgment based on the conditions that existed and the information and data available to us during the course of this assignment. Factual information regarding operations, conditions, and test data provided to Client, Reliant Party, or their representative has been assumed to be correct and complete.

This report has been prepared on behalf of and for the exclusive use of the Client and is subject to and issued in connection with the Agreement and the provisions thereof.

7.0 SIGNATURE OF ENVIRONMENTAL PROFESSIONALS

AEI Consultants has performed the Limited Asbestos Survey and Lead-Based Paint Screening for property located at 418 North California Street in Stockton, California in conformance with applicable Asbestos regulations. Any exceptions to, or deletions from, this practice are described in Sections 1.2 and 3.3 of this report. The survey was limited to the portions of the facility identified in the Introduction to this report.

Prepared By:



Brandon Koka, CSST, RMP, CDPH, RMP
Project Manager
AEI Consultants
2500 Camino Diablo
Walnut Creek, California 94597

Reviewed by:



David Gengenbacher, CAC, CDPH I/A, CIEC, RMP
Senior Project Manager
AEI Consultants
701 Campus Square W, Suite 723A
El Segundo, California 90245

APPENDIX A

INSPECTOR
CERTIFICATIONS

DEPARTMENT OF INDUSTRIAL RELATIONS

Division of Occupational Safety and Health-Asbestos Certification

1750 Howe Avenue, Suite 460

Sacramento, CA 95825

(916) 574-2993 Office <http://www.dir.ca.gov/dosh/asbestos.html> actu@dir.ca.gov

409255307C

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January 10, 2024

Michael J Schoedinger
10 E. Funderburg Blvd.
Mountain House CA 95391

Dear Certified Asbestos Consultant or Technician:

Enclosed is your certification card. **To maintain your certification, you must abide by the rules printed on the back of the certification card.**

Your certification is valid for a period of one year. If you wish to renew your certification, you must apply for renewal at least 60 days before the expiration date shown on your card. [8 CCR 341.15(h)(1)].

Please hold and do not send copies of your required AHERA refresher renewal certificates to our office until you apply for renewal of your certification.

Certificates must be kept current if you are actively working as a CAC or CSST. The grace period is only for those who are not actively working as an asbestos consultant or site surveillance technician.

Please contact our office at the above address or email w any changes in your contact/mailling information within 15 days of the change.

Sincerely,

Kevin Graulich
Principal Safety Engineer

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

Attachment: Certification Card

cc: File



Michael J. Schoedinger

Certification No. **14-5307**

Expires on **01/13/25**

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

DEPARTMENT OF INDUSTRIAL RELATIONS

Division of Occupational Safety and Health-Asbestos & Carcinogen Unit

1750 Howe Avenue, Suite 460

Sacramento, CA 95825

(916) 574-2993 Office <http://www.dir.ca.gov/dosh/asbestos.html> actu@dir.ca.gov

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September 06, 2024

Brandon J. Koka
330 North Civic Drive, Apt 202
Walnut Creek CA 94596

Dear Certified Asbestos Consultant or Technician:

Enclosed is your certification card. **To maintain your certification, you must abide by the rules printed on the back of the certification card.**

Your certification is valid for a period of one year. If you wish to renew your certification, you must apply for renewal at least 60 days before the expiration date shown on your card. [8 CCR 341.15(h)(1)].

Please hold and do not send copies of your required AHERA refresher renewal certificates to our office until you apply for renewal of your certification.

Certificates must be kept current if you are actively working as a CAC or CSST. The grace period is only for those who are not actively working as an asbestos consultant or site surveillance technician.

Please contact our office at the above address or email w any changes in your contact/mailling information within 15 days of the change.

Sincerely,

Dean Mochrie, CAC
Senior Safety Engineer

Attachment: Certification Card

cc: File

Renewal - Card Attached (08/24)



DEPARTMENT OF INDUSTRIAL RELATIONS

Division of Occupational Safety and Health-Asbestos Certification Unit

1750 Howe Avenue, Suite 460

Sacramento, CA 95825

(916) 574-2993 Office <http://www.dir.ca.gov/dosh/asbestos.html> actu@dir.ca.gov

302203299C

252

April 10, 2024

David P Gengenbacher
2115 Ohio Avenue, Apt A
Signal Hill CA 90755

Dear Certified Asbestos Consultant or Technician:

Enclosed is your certification card. **To maintain your certification, you must abide by the rules printed on the back of the certification card.**

Your certification is valid for a period of one year. If you wish to renew your certification, you must apply for renewal at least 60 days before the expiration date shown on your card. [8 CCR 341.15(h)(1)].

Please hold and do not send copies of your required AHERA refresher renewal certificates to our office until you apply for renewal of your certification.

Certificates must be kept current if you are actively working as a CAC or CSST. The grace period is only for those who are not actively working as an asbestos consultant or site surveillance technician.

Please contact our office at the above address or email w any changes in your contact/mailling information within 15 days of the change.

Sincerely,

Kevin Graulich
Principal Safety Engineer

Attachment: Certification Card

cc: File

Renewal – Card Attached



APPENDIX B

PHOTOGRAPHIC LOG



View of 418 California Street, Stockton, CA

APPENDIX C

LABORATORY CERTIFICATIONS

United States Department of Commerce
National Institute of Standards and Technology



Certificate of Accreditation to ISO/IEC 17025:2017

NVLAP LAB CODE: 200728-0

Eurofins EPK Built Environment Testing, LLC - Burlingame
Burlingame, CA

*is accredited by the National Voluntary Laboratory Accreditation Program for specific services,
listed on the Scope of Accreditation, for:*

Asbestos Fiber Analysis

*This laboratory is accredited in accordance with the recognized International Standard ISO/IEC 17025:2017.
This accreditation demonstrates technical competence for a defined scope and the operation of a laboratory quality
management system (refer to joint ISO-ILAC-IAF Communique dated January 2009).*

2023-07-01 through 2024-06-30

Effective Dates



A handwritten signature in blue ink, reading "Dana S. Laman".

For the National Voluntary Laboratory Accreditation Program

SCOPE OF ACCREDITATION TO ISO/IEC 17025:2017

Eurofins EPK Built Environment Testing, LLC - Burlingame

111 Anza Boulevard

Suite 122

Burlingame, CA 94010

Mrs. Tracy Garcia

Phone: 770-368-2171

Email: tracy.garcia@et.eurofinsus.com

<https://www.eurofinsus.com/environment-testing/built-environment>

ASBESTOS FIBER ANALYSIS

NVLAP LAB CODE 200728-0

Bulk Asbestos Analysis

Code

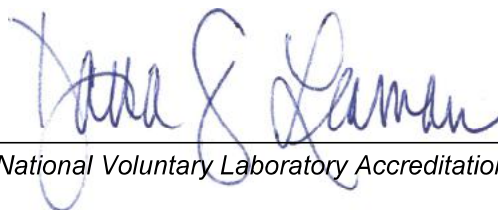
Description

18/A01

EPA -- 40 CFR Appendix E to Subpart E of Part 763, Interim Method of the Determination of Asbestos in Bulk Insulation Samples

18/A03

EPA 600/R-93/116: Method for the Determination of Asbestos in Bulk Building Materials



For the National Voluntary Laboratory Accreditation Program



AIHA Laboratory Accreditation Programs, LLC
acknowledges that
Eurofins EPK Built Environment Testing, LLC - Tustin
2841 Dow Ave Suite 300 Tustin, CA 92780
Laboratory ID: LAP-178697

along with all premises from which key activities are performed, as listed above, has fulfilled the requirements of the AIHA Laboratory Accreditation Programs, LLC (AIHA LAP) accreditation to the ISO/IEC 17025:2017 international standard, General Requirements for the Competence of Testing and Calibration Laboratories in the following:

LABORATORY ACCREDITATION PROGRAMS

☒	INDUSTRIAL HYGIENE	Accreditation Expires: November 01, 2025
☒	ENVIRONMENTAL LEAD	Accreditation Expires: November 01, 2025
☒	ENVIRONMENTAL MICROBIOLOGY	Accreditation Expires: November 01, 2025
☐	FOOD	Accreditation Expires:
☐	UNIQUE SCOPES	Accreditation Expires:
☐	BE FIELD/MOBILE	Accreditation Expires:

Specific Field(s) of Testing/Method(s) within each Accreditation Program for which the above named laboratory maintains accreditation is outlined on the attached Scope of Accreditation. Continued accreditation is contingent upon successful on-going compliance with ISO/IEC 17025:2017 and AIHA LAP requirements. This certificate is not valid without the attached Scope of Accreditation. Please review the AIHA LAP website (www.aihaaccreditedlabs.org) for the most current Scope.

A handwritten signature in black ink that reads 'Cheryl O. Morton'.

Cheryl O Morton
Managing Director, AIHA Laboratory Accreditation Programs, LLC



AIHA Laboratory Accreditation Programs, LLC

SCOPE OF ACCREDITATION

Eurofins EPK Built Environment Testing, LLC - Tustin

Laboratory ID: LAP-178697

2841 Dow Ave Suite 300 Tustin, CA 92780

Issue Date: 01/01/2024

Expire Date: 11/01/2025

The laboratory is approved for those specific field(s) of testing/methods listed in the table below. Clients are urged to verify the laboratory's current accreditation status for the particular field(s) of testing/Methods, since these can change due to proficiency status, suspension and/or withdrawal of accreditation.

The EPA recognizes the AIHA LAP, LLC ELLAP program as meeting the requirements of the National Lead Laboratory Accreditation Program (NLLAP) established under Title X of the Residential Lead-Based Paint Hazard Reduction Act of 1992 and includes paint, soil and dust wipe analysis. Air and composited wipes analyses are not included as part of the NLLAP.

Environmental Lead Laboratory Accreditation Program (ELLAP)

Initial Accreditation Date: 03/01/2017

Component, parameter, characteristic, material, or product tested	Technology sub-type/Detector	Method	Method Description (for internal methods only)
Paint	AA	EPA SW-846 7000B Modified	N/A
		NIOSH 7082	N/A
Settled Dust by Wipe	AA	EPA SW-846 7000B Modified	N/A
		NIOSH 7082	N/A

A complete listing of currently accredited ELLAP laboratories is available on the AIHA LAP, LLC website at:
<http://www.aihaaccreditedlabs.org>

APPENDIX D

LABORATORY ANALYTICAL REPORTS

Report for:

David Gengenbacher, Brandon Koka, Sam Lardizabal
AEI Consultants
2207 W 190th St
Torrance, CA 90504

Regarding: Eurofins EPK Built Environment Testing, LLC
Project: 502869; Central Valley Low Income Housing 418 North California, Stockton, CA 95202
EML ID: 3891167

Approved by:



Approved Signatory
Amin Suliman

Dates of Analysis:
Asbestos PLM: 12-30-2024

Service SOPs: Asbestos PLM (EPA 40CFR App E to Sub E of Part 763 & EPA METHOD 600/R-93-116, SOP EM-AS-S-1267)
NVLAP Lab Code 200728-0

All samples were received in acceptable condition unless noted in the Report Comments portion in the body of the report. The results relate only to the samples as received and tested. The results include an inherent uncertainty of measurement associated with estimating percentages by polarized light microscopy. Measurement uncertainty data for sample results with >1% asbestos concentration can be provided when requested.

Eurofins EPK Built Environment Testing, LLC ("the Company"), a member of the Eurofins Built Environment Testing group of companies, shall have no liability to the client or the client's customer with respect to decisions or recommendations made, actions taken or courses of conduct implemented by either the client or the client's customer as a result of or based upon the Test Results. In no event shall the Company be liable to the client with respect to the Test Results except for the Company's own willful misconduct or gross negligence nor shall the Company be liable for incidental or consequential damages or lost profits or revenues to the fullest extent such liability may be disclaimed by law, even if the Company has been advised of the possibility of such damages, lost profits or lost revenues. In no event shall the Company's liability with respect to the Test Results exceed the amount paid to the Company by the client therefor.

Client: AEI Consultants
C/O: David Gengenbacher, Brandon Koka, Sam
Lardizabal
Re: 502869; Central Valley Low Income Housing
418
North California, Stockton, CA 95202

Eurofins EPK Built Environment Testing, LLC
111 Anza Boulevard, Suite 122, Burlingame, CA 94010
(833) 465-5857 www.eurofinsus.com/Built
Date of Sampling: 12-19-2024
Date of Receipt: 12-20-2024
Date of Report: 12-30-2024

Summary of Samples with Asbestos Detected

Total Samples Submitted:	33
Total Samples Analyzed:	33
Total Layers Analyzed:	57

Total Samples with Layer Asbestos Content > 1%: 0

Total Samples with Layer Asbestos Content < 1%: 0

The test report shall not be reproduced except in full, without written approval of the laboratory. The report must not be used by the client to claim product certification, approval, or endorsement by NVLAP, NIST, or any agency of the federal government. The Company 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.

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Client: AEI Consultants
C/O: David Gengenbacher, Brandon Koka, Sam Lardizabal
Re: 502869; Central Valley Low Income Housing 418
North California, Stockton, CA 95202

Eurofins EPK Built Environment Testing, LLC
111 Anza Boulevard, Suite 122, Burlingame, CA 94010
(833) 465-5857 www.eurofinsus.com/Built
Date of Sampling: 12-19-2024
Date of Receipt: 12-20-2024
Date of Report: 12-30-2024

ASBESTOS PLM REPORT

Location: 1-1, Plaster Wall/Ceiling- #306 Closet

Lab ID-Version‡: 19283236-1

Sample Layers	Asbestos Content
Off-White Plaster	ND
Sample Composite Homogeneity: Good	

Location: 1-2, Plaster Wall/Ceiling- #312 Closet

Lab ID-Version‡: 19283237-1

Sample Layers	Asbestos Content
Off-White Plaster	ND
Sample Composite Homogeneity: Good	

Location: 1-3, Plaster Wall/Ceiling- 3F Hallway

Lab ID-Version‡: 19283238-1

Sample Layers	Asbestos Content
Off-White Plaster	ND
Sample Composite Homogeneity: Good	

Location: 1-4, Plaster Wall/Ceiling- #210 Closet

Lab ID-Version‡: 19283239-1

Sample Layers	Asbestos Content
Off-White Plaster	ND
Sample Composite Homogeneity: Good	

Location: 1-5, Plaster Wall/Ceiling- #209 Closet

Lab ID-Version‡: 19283240-1

Sample Layers	Asbestos Content
Off-White Plaster	ND
Sample Composite Homogeneity: Good	

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Client: AEI Consultants
C/O: David Gengenbacher, Brandon Koka, Sam Lardizabal
Re: 502869; Central Valley Low Income Housing 418
North California, Stockton, CA 95202

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(833) 465-5857 www.eurofinsus.com/Built
Date of Sampling: 12-19-2024
Date of Receipt: 12-20-2024
Date of Report: 12-30-2024

ASBESTOS PLM REPORT

Location: 1-6, Plaster Wall/Ceiling- #212 Closet

Lab ID-Version‡: 19283241-1

Sample Layers	Asbestos Content
Off-White Plaster	ND
Sample Composite Homogeneity: Good	

Location: 2-1, Drywall w/ Texture (Knockdown)- #6 Living Rm

Lab ID-Version‡: 19283242-1

Sample Layers	Asbestos Content
Off-White Texture	ND
Off-White Drywall with Brown Paper	ND
Composite Non-Asbestos Content: 10% Cellulose	
Sample Composite Homogeneity: Moderate	

Location: 2-2, Drywall w/ Texture (Knockdown)- 1F Hallway

Lab ID-Version‡: 19283243-1

Sample Layers	Asbestos Content
Off-White Texture	ND
Cream Tape	ND
Off-White Joint Compound	ND
Off-White Drywall with Brown Paper	ND
Composite Non-Asbestos Content: 15% Cellulose	
Sample Composite Homogeneity: Moderate	

Location: 2-3, Drywall w/ Texture (Knockdown)- #8 Living Rm

Lab ID-Version‡: 19283244-1

Sample Layers	Asbestos Content
Off-White Texture	ND
White Tape (Mesh)	ND
Off-White Drywall with Brown Paper	ND
Composite Non-Asbestos Content: 10% Cellulose 5% Glass Fibers	
Sample Composite Homogeneity: Moderate	

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Client: AEI Consultants
 C/O: David Gengenbacher, Brandon Koka, Sam Lardizabal
 Re: 502869; Central Valley Low Income Housing 418
 North California, Stockton, CA 95202

Eurofins EPK Built Environment Testing, LLC
 111 Anza Boulevard, Suite 122, Burlingame, CA 94010
 (833) 465-5857 www.eurofinsus.com/Built
 Date of Sampling: 12-19-2024
 Date of Receipt: 12-20-2024
 Date of Report: 12-30-2024

ASBESTOS PLM REPORT

Location: 2-4, Drywall w/ Texture (Knockdown)- Laundry Rm

Lab ID-Version‡: 19283245-1

Sample Layers	Asbestos Content
Off-White Texture	ND
Yellow Tape (Mesh)	ND
Off-White Joint Compound with Paint	ND
Off-White Drywall with Brown Paper	ND
Composite Non-Asbestos Content:	10% Cellulose 5% Glass Fibers
Sample Composite Homogeneity:	Moderate

Location: 2-5, Drywall w/ Texture (Knockdown)- Storage/Shop

Lab ID-Version‡: 19283246-1

Sample Layers	Asbestos Content
Off-White Texture	ND
Off-White Drywall with Brown Paper	ND
Composite Non-Asbestos Content:	10% Cellulose
Sample Composite Homogeneity:	Moderate

Location: 3-1, Brown Vinyl Sheet Flooring- 1F Hall- North Exit

Lab ID-Version‡: 19283247-1

Sample Layers	Asbestos Content
Brown/Gray Sheet Flooring	ND
Tan Adhesive	ND
Sample Composite Homogeneity:	Moderate

Location: 3-2, Brown Vinyl Sheet Flooring- 2F Hall- North Exit

Lab ID-Version‡: 19283248-1

Sample Layers	Asbestos Content
Brown/Gray Sheet Flooring	ND
Tan Adhesive	ND
Sample Composite Homogeneity:	Moderate

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Client: AEI Consultants
 C/O: David Gengenbacher, Brandon Koka, Sam Lardizabal
 Re: 502869; Central Valley Low Income Housing 418
 North California, Stockton, CA 95202

Eurofins EPK Built Environment Testing, LLC
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 (833) 465-5857 www.eurofinsus.com/Built
 Date of Sampling: 12-19-2024
 Date of Receipt: 12-20-2024
 Date of Report: 12-30-2024

ASBESTOS PLM REPORT

Location: 3-3, Brown Vinyl Sheet Flooring- 1F Hall- East Exit

Lab ID-Version‡: 19283249-1

Sample Layers	Asbestos Content
Brown/Gray Sheet Flooring	ND
Tan Adhesive	ND
Sample Composite Homogeneity: Moderate	

Location: 3-4, Brown Vinyl Sheet Flooring w/ 2nd Layer- #306 Foyer/Entry

Lab ID-Version‡: 19283250-1

Sample Layers	Asbestos Content
Brown/Gray Sheet Flooring	ND
Tan Adhesive	ND
Red-Brown Non-Fibrous Material	ND
Sample Composite Homogeneity: Moderate	

Location: 4-1, Stucco- West Exterior

Lab ID-Version‡: 19283251-1

Sample Layers	Asbestos Content
Light Gray Stucco	ND
Brown/Gray Stucco	ND
Sample Composite Homogeneity: Good	

Location: 4-2, Stucco- East Exterior

Lab ID-Version‡: 19283252-1

Sample Layers	Asbestos Content
Light Gray Stucco	ND
Brown/Gray Stucco	ND
Sample Composite Homogeneity: Good	

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Client: AEI Consultants
C/O: David Gengenbacher, Brandon Koka, Sam Lardizabal
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North California, Stockton, CA 95202

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(833) 465-5857 www.eurofinsus.com/Built
Date of Sampling: 12-19-2024
Date of Receipt: 12-20-2024
Date of Report: 12-30-2024

ASBESTOS PLM REPORT

Location: 4-3, Stucco- East Exterior

Lab ID-Version‡: 19283253-1

Sample Layers	Asbestos Content
Tan Stucco	ND
Light Gray Stucco	ND
Sample Composite Homogeneity: Good	

Location: 5-1, White Brick Mortar- North Exterior

Lab ID-Version‡: 19283254-1

Sample Layers	Asbestos Content
White Mortar	ND
Sample Composite Homogeneity: Good	

Location: 5-2, White Brick Mortar- North Exterior

Lab ID-Version‡: 19283255-1

Sample Layers	Asbestos Content
White Mortar	ND
Sample Composite Homogeneity: Good	

Location: 5-3, White Brick Mortar- North Exterior

Lab ID-Version‡: 19283256-1

Sample Layers	Asbestos Content
White Mortar	ND
Sample Composite Homogeneity: Good	

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Client: AEI Consultants
 C/O: David Gengenbacher, Brandon Koka, Sam Lardizabal
 Re: 502869; Central Valley Low Income Housing 418
 North California, Stockton, CA 95202

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ASBESTOS PLM REPORT

Location: 6-1, Roof Shingle w/ Felt- Roof Vent Sheds

Lab ID-Version‡: 19283257-1

Sample Layers	Asbestos Content
Black Roofing Shingle with Red and Grey Stones	ND
Black Roofing Shingle with Grey Stones	ND
Black Roofing Felt	ND
Composite Non-Asbestos Content:	40% Cellulose 30% Glass Fibers
Sample Composite Homogeneity:	Moderate

Location: 6-2, Roof Shingle w/ Felt- Roof Vent Sheds

Lab ID-Version‡: 19283258-1

Sample Layers	Asbestos Content
Black Roofing Shingle with Red and Grey Stones	ND
Black Roofing Shingle with Grey Stones	ND
Black Roofing Felt	ND
Composite Non-Asbestos Content:	40% Cellulose 30% Glass Fibers
Sample Composite Homogeneity:	Moderate

Location: 6-3, Roof Shingle w/ Felt- Roof Vent Sheds

Lab ID-Version‡: 19283259-1

Sample Layers	Asbestos Content
Black Roofing Shingle with Red and Grey Stones	ND
Black Roofing Shingle with Grey Stones	ND
Black Roofing Felt	ND
Composite Non-Asbestos Content:	40% Cellulose 30% Glass Fibers
Sample Composite Homogeneity:	Moderate

Location: 7-1, Black Roof Coating- West Parapet

Lab ID-Version‡: 19283260-1

Sample Layers	Asbestos Content
Black Roofing Material	ND
Composite Non-Asbestos Content:	10% Cellulose
Sample Composite Homogeneity:	Good

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 North California, Stockton, CA 95202

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ASBESTOS PLM REPORT

Location: 7-2, Black Roof Coating- West Parapet

Lab ID-Version‡: 19283261-1

Sample Layers	Asbestos Content
Black Roofing Material	ND
Sample Composite Homogeneity: Good	

Location: 7-3, Black Roof Coating- West Parapet

Lab ID-Version‡: 19283262-1

Sample Layers	Asbestos Content
Black Roofing Material	ND
Sample Composite Homogeneity: Good	

Location: 8-1, Tan Roof Caulk- North Parapet Cap

Lab ID-Version‡: 19283263-1

Sample Layers	Asbestos Content
Tan Caulk	ND
Sample Composite Homogeneity: Good	

Location: 8-2, Tan Roof Caulk- West Parapet Cap

Lab ID-Version‡: 19283264-1

Sample Layers	Asbestos Content
Tan Caulk	ND
Sample Composite Homogeneity: Good	

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 Re: 502869; Central Valley Low Income Housing 418
 North California, Stockton, CA 95202

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 Date of Sampling: 12-19-2024
 Date of Receipt: 12-20-2024
 Date of Report: 12-30-2024

ASBESTOS PLM REPORT

Location: 8-3, Tan Roof Caulk- South Parapet Cap

Lab ID-Version‡: 19283265-1

Sample Layers	Asbestos Content
Tan Caulk	ND
Sample Composite Homogeneity: Good	

Location: 9-1, White Roof Caulking- Vent Penetration Boot

Lab ID-Version‡: 19283266-1

Sample Layers	Asbestos Content
White Caulk	ND
Sample Composite Homogeneity: Good	

Location: 9-2, White Roof Caulking- Vent Penetration Boot

Lab ID-Version‡: 19283267-1

Sample Layers	Asbestos Content
White Caulk	ND
Sample Composite Homogeneity: Good	

Location: 9-3, White Roof Caulking- Vent Penetration Boot

Lab ID-Version‡: 19283268-1

Sample Layers	Asbestos Content
White Caulk	ND
Sample Composite Homogeneity: Good	

The test report shall not be reproduced except in full, without written approval of the laboratory. The report must not be used by the client to claim product certification, approval, or endorsement by NVLAP, NIST, or any agency of the federal government. The Company 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 components not quantified as asbestos content and non-asbestos content are considered to be non-fibrous matrix components. Matrix components may include, but are not limited to, gypsum, paint, silicate minerals, vinyl, binder, calcium carbonate, tar, and foam.

Inhomogeneous samples are separated into homogeneous subsamples and analyzed individually. ND means no fibers were detected. When detected, the minimum detection and reporting limit is less than 1% unless point counting is performed. Floor tile samples may contain large amounts of interference material and it is recommended that the sample be analyzed by gravimetric point count analysis to lower the detection limit and to aid in asbestos identification.

‡ A "Version" indicated by "-x" after the Lab ID# with a value greater than 1 indicates a sample with amended data. The revision number is reflected by the value of "x".

Client: AEI Consultants
C/O: David Gengenbacher, Brandon Koka, Sam
Lardizabal
Re: 502869; Central Valley Low Income Housing
418
North California, Stockton, CA 95202

Eurofins EPK Built Environment Testing, LLC
111 Anza Boulevard, Suite 122, Burlingame, CA 94010
(833) 465-5857 www.eurofinsus.com/Built

Date of Sampling: 12-19-2024

Date of Receipt: 12-20-2024

Date of Report: 12-30-2024

ASBESTOS PLM REPORT

PROJECT ANALYST AND SIGNATORY REPORT

Project Analyst



Analyst: James Schatz

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ASBESTOS CHAIN OF CUSTODY

PLM EPA 600/R-93/116

701 Campus Square W, Suite 723A
El Segundo, CA 90245

DATE: 12/19/24



003891167

EMAIL RESULTS TO: ☒ dgengenbacher@aeiconsultants.com
☒ slardizabal@aeiconsultants.com
☒ bkoka@aeiconsultants.comTURN-AROUND TIME: Same Day _____ Next Day _____ 72 Hours ☒

Inspector: Michael Schoedinger

Client/Project Name: Central Valley Low Income Housing

Project Number: 502869

Address: 418 North California, Stockton, CA 95202

PO. Number: 389748

Laboratory: Eurofins EPK Built Environment Testing,
LLC

H.A.	SAMPLE NO.	MATERIAL DESCRIPTION	SAMPLE LOCATION	SQ. FT.
1	1-1	Plaster wall/ceiling	#306 closet	27000 SF
	1-2		#312 closet	
	1-3		✓ #3F Hallway	
	1-4		#210 closet	
	1-5		#209 closet	
	1-6		#212 closet	
2	2-1	Drywall w/ texture (knockdown)	#6 Living Rm	13,500 SF
	2-2		1F Hallway	
	2-3		#8 Living Rm	
	2-4		Laundry Rm	
	2-5		Storage/Shop	
3	3-1	Brown Vinyl Sheet Flooring	1F Hall - North Exit	50 SF
	3-2		2F Hall - North Exit	
	3-3		1F Hall - East Exit	
	3-4		#306 Foyer/Entry	
		w/ 2ND layer		

Relinquished By: Mike Schoedinger

Signature:

Date / Time: 12/19/24

Received By:

Signature:

Date / Time: 12/20/24

LAB ID NO:

Page 1 of 2

Report for:

David Gengenbacher
AEI Consultants
2207 W 190th St
Torrance, CA 90504

Regarding: Eurofins EPK Built Environment Testing, LLC
Project: 418 North California, Stockton, CA; Central Valley Low Income Housing/502869
EML ID: 3891155

Approved by:



Approved Signatory
Andrew Arestegui

Dates of Analysis:

Lead - Flame AA: 12-27-2024

Service SOPs: Lead - Flame AA (EM-BC-S-8443)
AIHA LAP, LLC accredited service, Lab ID #178697

All samples were received in acceptable condition unless noted in the Report Comments portion in the body of the report. Due to the nature of the analyses performed, field blank correction of results is not applied. The results relate only to the samples as received and tested. Sample size, as it relates to Wipe samples only, is supplied by the client.

Eurofins EPK Built Environment Testing, LLC ("the Company"), a member of the Eurofins Built Environment Testing group of companies, shall have no liability to the client or the client's customer with respect to decisions or recommendations made, actions taken or courses of conduct implemented by either the client or the client's customer as a result of or based upon the Test Results. In no event shall the Company be liable to the client with respect to the Test Results except for the Company's own willful misconduct or gross negligence nor shall the Company be liable for incidental or consequential damages or lost profits or revenues to the fullest extent such liability may be disclaimed by law, even if the Company has been advised of the possibility of such damages, lost profits or lost revenues. In no event shall the Company's liability with respect to the Test Results exceed the amount paid to the Company by the client therefor.

Eurofins EPK Built Environment Testing, LLC's LabServe® reporting system includes automated fail-safes to ensure that all AIHA LAP, LLC quality requirements are met and notifications are added to reports when any quality steps remain pending.

Eurofins EPK Built Environment Testing, LLC

2841 Dow Avenue, Suite 300, Tustin, CA 92780

(833) 465-5857 www.eurofinsus.com/Built

Client: AEI Consultants

C/O: David Gengenbacher

Re: 418 North California, Stockton, CA; Central
Valley Low Income Housing/502869

Date of Sampling: 12-19-2024

Date of Receipt: 12-20-2024

Date of Report: 12-27-2024

LEAD: FLAME ATOMIC ABSORPTION SPECTROMETRY

Location:	L-1: Metal door blue, roof	L-2: White wood trim, 1F hallway	L-3: Beige plaster wall, 2F hallway	L-4: Beige drywall, 1F hallway
Comments (see below)	A	A	A	A
Lab ID-Version‡:	19281377-1	19281378-1	19281379-1	19281380-1
Analysis Date:	12/27/2024	12/27/2024	12/27/2024	12/27/2024
Sample type	Paint Chip sample	Paint Chip sample	Paint Chip sample	Paint Chip sample
Method*	NIOSH 7082 & EPA 7000B modified	NIOSH 7082 & EPA 7000B modified	NIOSH 7082 & EPA 7000B modified	NIOSH 7082 & EPA 7000B modified
† Method Reporting Limit	40 ppm	40 ppm	39 ppm	39 ppm
Sample size	0.2527 grams	0.2528 grams	0.2576 grams	0.2572 grams
§ Total Lead Result	280 ppm	< 40 ppm	230 ppm	< 39 ppm

Comments: A) The relative percent difference of the matrix duplicate pair was above control limits. The laboratory control sample and matrix blank were both within control limits and validated the batch.

Sample results have not been corrected for blank values.

Bulk samples are not covered under the AIHA LAP, LLC service accreditation.

Wipe samples must meet ASTM E1792 criteria. Method Reporting Limits may not be valid for non-ASTM E1792 wipe samples.

*Sample preparation and analytical methods are based upon NIOSH 7082 and EPA 7000B.

† The Method Reporting Limit is the minimum concentration of Lead that the laboratory can confidently detect in the sample.

§ Total Lead Result has been rounded to two significant figures to reflect analytical precision.

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Client: AEI Consultants

C/O: David Gengenbacher

Re: 418 North California, Stockton, CA; Central
Valley Low Income Housing/502869

Date of Sampling: 12-19-2024

Date of Receipt: 12-20-2024

Date of Report: 12-27-2024

LEAD: FLAME ATOMIC ABSORPTION SPECTROMETRY

PROJECT ANALYST AND SIGNATORY REPORT

Project Analyst



Analyst: Yue Wu

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East: (866) 871-1984
Central: (800) 651-4802
West: (866) 888-6653

WEATHER		Fog	Rain	Snow	Wind	Clear
LEVEL	None					
	Light					
	Moderate					
	Heavy					

REQUESTED SE



003891155

CONTACT INFORMATION

Company:	AEI Consultants	Address:	701 Campus Square W, Suite 723A, El Segundo, CA 90245
Contact:	David Gengenbacher	Special Instructions:	dgengenbacher@aeiconsultants.com slardizabal@aeiconsultants.com bkoka@aeiconsultants.com
Phone:	562.235.6654		

PROJECT INFORMATION

Project ID:	418 North California, Stockton, CA 95202		
Project Description:	Central Valley Low Income Housing/502869		
Project Zip Code:	95202	Sampling Date/Time:	12/19/24
PO Number:	389741	Sampled By:	Mike Schoedinger

TURN AROUND TIME CODES - (TAT)

STD - Standard (Default)	Rushes received after 2pm or on weekends, will be considered received the next business day. Please alert us in advance of weekend analysis needs.
ND - Next Business Day	
SD - Same Business Day	
WH - Weekend/Holiday/ASAP	

[illegible]

SAMPLE TYPE CODES

BC - BioCassette™	CP - Contact Plate	T - Tape	O - Other:
A1S - Andersen	ST - Spore Trap	SW - Swab	
SAS - Surface Air Sampler	B - Bulk	SO - Soil	
NP - Non-potable Water	P - Potable Water	D - Dust	

RELINQUISHED BY

RELINQUISHED BY	DATE & TIME
	12/19/24

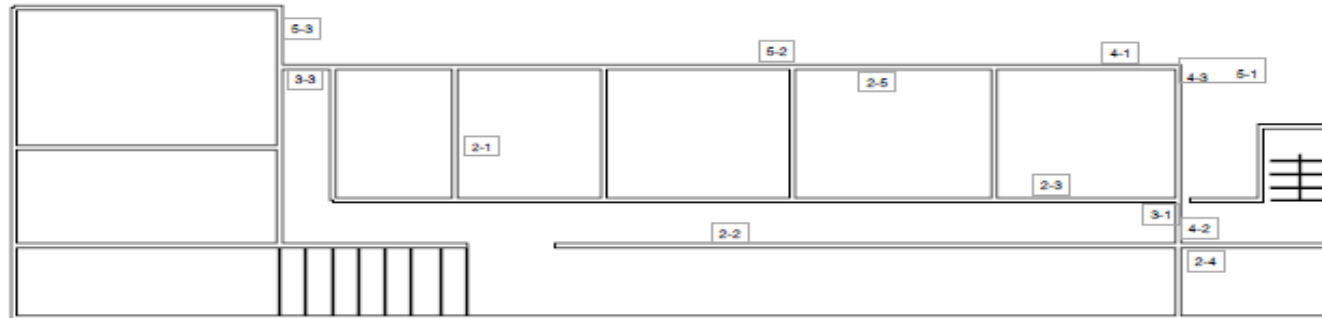
RECEIVED BY

RECEIVED BY	DATE & TIME
LF 12/20/24	950

DATE & TIME

APPENDIX E

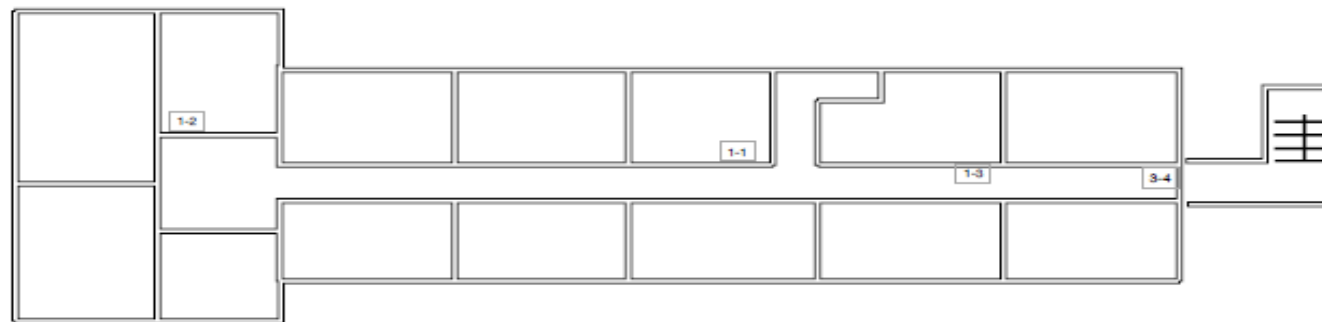
SITE SAMPLE LOCATION DIAGRAMS



FIRST FLOOR



SECOND FLOOR



THIRD FLOOR

LEGEND

#-# - Non- ACM

Prepared for: Central Valley Low Income
Housing Corporation
Project: Limited Pre-Renovation Asbestos
Survey and Lead-Based Paint Screening
Scale: Not to Scale
AEI Project Number: 500681



Site Diagram

418 North California Street,
Stockton, California 95202

Exhibit

1



LEGEND

#-# - Non- ACM

Prepared for: Central Valley Low Income
Housing Corporation
Project: Limited Pre-Renovation Asbestos
Survey and Lead-Based Paint Screening
Scale: Not to Scale
AEI Project Number: 500681



Site Diagram - Roof

418 North California Street,
Stockton, California 95202

Exhibit

2