



PLM¹ Suspect Asbestos Bulk Sample Results

**From: Air Environmental LLC
P.O. Box 294
Santa Rosa, Ca 95402**

**To: Attn: Michael Green
Lakeport Yacht Club
707-263-5078
lakeportsails@gmail.com**

Date: 2-23-24

Address: 15 5th St, Lakeport, CA 95453

Date of testing: 2-22-24

Per your request, Air Environmental performed suspect asbestos bulk sampling at the above referenced location. The purpose of this sample collection was to ascertain the presence or absence of asbestos in the suspect, Presumed Asbestos-Containing Material (PACM) / Asbestos Containing Building Material (ACBM), that will be disturbed during work activities.

This sample collection does not include any other areas and/or materials other than the areas and materials listed in this report. (see attached chain of custody forms and sampling area plan for listed sample locations)

During the course of this asbestos inspection **(2)** samples were collected with the subsequent analysis of **(5)** discrete samples. The samples collected were cataloged on site and then delivered, Via FedEx, to Environmental Testing Laboratories for analysis by Polarized Light Microscopy (PLM¹). **The subsequent analysis of the samples showed no asbestos present in the collected samples.** (see attached laboratory report)

This sample collection and report shall not be interpreted or used as a complete asbestos survey for any other purpose other than that referenced above. The ACBMs identified and collected in this report does not identify any other suspect materials that may be present in the area hidden in walls, above ceilings or floors covered with multiple layers of flooring materials. In the event that any other suspect materials are discovered during the work activities, all work must stop until the suspect materials, ACBMs, are collected and analyzed.

Asbestos Information

The Code of Federal Regulations (CFR), 40 CFR 61, Subpart M, National Emissions Standards for Hazardous Air Pollutants (NESHAP) and Federal Occupational Safety and Health Administration (FED OSHA) classify asbestos-containing material (ACM) as any material or product that contains greater than 1% asbestos. Non-friable ACM is classified by NESHAP as either Category I or Category II material defined as follows:

- **Category I** – asbestos-containing packings, gaskets, resilient floor coverings, and asphalt roofing products.
- **Category II** – all remaining types of non-friable asbestos-containing material not included in Category I that when dry, cannot be crumbled, pulverized, or reduced to powder by hand pressure.

Regulated asbestos-containing material (RACM), a hazardous waste, is classified as any manufactured material that contains **greater than** 1% asbestos by dry weight and is:

- Friable (can be crumbled, pulverized, or reduced to powder by hand pressure); or
- Category I material that has become friable; or
- Category I material that has been subjected to sanding grinding, cutting or abrading; or
- Category II non-friable material that has a high probability of becoming crumbled, pulverized, or reduced to a powder during demolition or renovation activities.

A homogeneous area shall be determined to contain asbestos based on a finding that the results of at least one sample collected from that area shows that asbestos is present. "Asbestos-containing construction material" (ACCM) means any manufactured construction material which contains more than one tenth of 1 percent asbestos by weight.

More than 50 countries, including the United Kingdom, Australia and all 28 countries of the European Union have banned the use of asbestos. However the U.S. continues to import and use asbestos with no plan for stricter regulations in place. We now know for certain that all forms of asbestos can cause mesothelioma, lung cancer and other chronic respiratory conditions. Although it is highly regulated in the U.S. asbestos continues to be used in hundreds of consumer products as long as it accounts for **less than one percent <1%** of the product by dry weight.

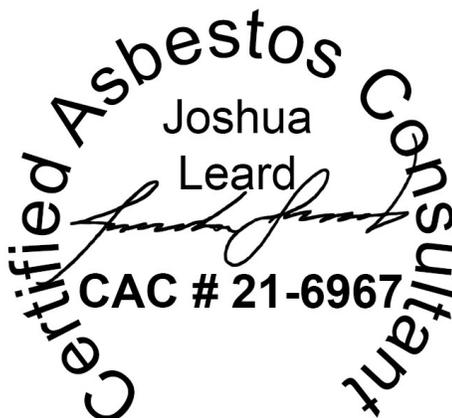
Activities that disturb materials containing asbestos are subject to certain requirements of the Cal/OSHA asbestos standard contained in Title 8, CCR Section 1529. Typically, removal or disturbance of more than 100 square feet of material containing more than 0.1% asbestos must be performed by a DOSH registered asbestos abatement contractor. Materials containing more than 1% asbestos are also subject to NESHAP regulations (40 CFR Part 61, Subpart M). RACM (friable ACM and non-friable ACM that will become friable during demolition operations) must be removed from structures prior to demolition.

Certain non-friable ACM and materials containing 1% or less asbestos may remain in structures during demolition; however, there are waste handling/disposal issues and Cal/OSHA work requirements that may make it cost ineffective to do so. Contractors are responsible for segregating and characterizing waste streams prior to disposal. With respect to potential worker exposure, notification, and registration requirements, Cal/OSHA defines asbestos-containing construction material as material that contains more than 0.1% asbestos (Title 8, CCR 341.6).

The Department of Toxic Substances Control (DTSC) classifies asbestos-containing material as a hazardous waste if it is “friable” and contains one percent (1.0%) or more asbestos as hazardous waste. A friable waste is one that can be reduced to a powder or dust under hand pressure when dry. This classification standard is given in California Code of Regulations, section 66261.24. Because the United States Environmental Protection Agency (U.S.EPA) does not regulate asbestos as hazardous waste under the Resource Conservation and Recovery Act (RCRA), it is considered to be a “non-RCRA, or “California-only” hazardous waste.

Joshua Leard, Nate Cowan & Pierce Tibbals
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CA DOSH #21-6967

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¹ (PLM) Polarized Light Microscopy EPA Method 600/R-93-116

² (NESHAP) National Emission Standards for Hazardous Air Pollutants



**ENVIRONMENTAL TESTING
LABORATORIES, INC.**

37575 W HURON RIVER DRIVE
ROMULUS, MICHIGAN 48174
(734) 955-6600
FAX: (734) 955-6604

To: Air Environmental
PO Box 294
Santa Rosa, California 95402

ETL Job: 266854
Client Project: N/A

Attention: Josh Leard
Project Location: 15 5th St., Lakeport, CA 95453

Lab Sample Number	Client Sample Number	Sample Type	Completed
1636674	B1	Asbestos	02/23/2024
1636675	B2	Asbestos	02/23/2024

Reviewed by:

Eleni Kiliaris

Summary

Method	Sample	Layer	Mastic
PLM	3	2	

Polarized Light Microscopy Asbestos Analysis Report

To : Air Environmental
 PO Box 294
 Santa Rosa, California 95402
 Location : 15 5th St., Lakeport, CA 95453

ETL Job : 266854
 Client Project : N/A
 Date Collected : 02/22/2024
 Date Received : 02/23/2024

Sample	Description	Appearance	% Fibrous	% Non-Fibrous	% Asbestos
1636674 B1 Kitchen Layer-1 Analyst: Ben Jones Date Analyzed : 02/23/2024	Tile	White Non-Fibrous Homogenous	PLM Trace Cellulose	PLM 100% Other	PLM None Detected
1636674 B1 Kitchen Layer-2 Analyst: Ben Jones Date Analyzed : 02/23/2024	Mastic	Black Non-Fibrous Homogenous	PLM Trace Cellulose	PLM 74% Other	PLM None Detected
1636675 B2 Main Hall Layer-1 Analyst: Ben Jones Date Analyzed : 02/23/2024	Tile	White Non-Fibrous Homogenous	PLM Trace Cellulose	PLM 100% Other	PLM None Detected
1636675 B2 Main Hall Layer-2 Analyst: Ben Jones Date Analyzed : 02/23/2024	Mastic	Brown Non-Fibrous Homogenous	PLM Trace Cellulose	PLM 100% Other	PLM None Detected
1636675 B2 Main Hall Layer-3 Analyst: Ben Jones Date Analyzed : 02/23/2024	Brittle Material	White Non-Fibrous Homogenous	PLM Trace Cellulose	PLM 100% Other	PLM None Detected

Edm Kilini
 Lab Supervisor/Other Signatory

Analyst:

Ben Jones
 Ben Jones



Certificate of Analysis

Environmental Testing Laboratories, Inc.
37575 W Huron River Drive
Romulus, Michigan 48174
(734) 955-6600, Fax: (734) 955-6604

Polarized Light Microscopy Asbestos Analysis Report

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ETL Job : 266854
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Sample	Description	Appearance	% Fibrous	% Non-Fibrous	% Asbestos
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400 Point Count Results by EPA 600/R-93/116 PLM (denoted by "PC")
Item 198.1: PLM Methods for Identifying and Quantitating Asbestos in Bulk Samples
Item 198.6: PLM Methods for Identifying and Quantitating Asbestos in Non-Friable Organically Bound Bulk Samples
EPA 600/R-93/116: Method for Determination of Asbestos in Bulk Building Materials
EPA 600/M4-82-020: Interim Method for Determination of Asbestos in Bulk Insulation Samples
A % Asbestos result of "Trace" indicates that the analyzed material was found to contain less than 1% asbestos and would not be considered an Asbestos Containing Material (ACM).

ETL, Inc. maintains liability limited to cost of analysis. This report relates only to the samples reported and may not be reproduced without written approval by ETL, Inc. Test Method EPA 600/R-93-116 & EPA 600/M4-82/020 or NYSDOH-ELAP item 198.1 and/or 198.6 was used to analyze all samples. Matrix interference and/or resolution limits (i.e. detecting asbestos in non-friable organically bound materials) may yield false results in certain circumstances. Quantitative transmission electron microscopy (TEM) is currently the only method that can pronounce materials as non-asbestos containing. Interpretation and use of test results are the responsibility of the client. ETL, Inc. is not responsible for the accuracy of the results when requested to physically separate and analyze layered samples. Any PLM results below 10% should be re-analyzed using the EPA recommended Point Count method. Any material that has greater than 1% asbestos content is considered to be an Asbestos Containing Material (ACM). These materials are regulated by both OSHA and the EPA and must be treated accordingly. Results are related to only to samples that were tested. An estimate of uncertainty can be provided at the client's request.

Boys
Bathroom

Kitchen

Girls
Bathroom

● B1

B2
●

Main Hall