ENVIRONMENTAL MANAGEMENT INC.

430 Silver Spur Road, Suite 201
Rancho Palos Verdes, CA 90275
Tel: (310) 544 1837
Fax: (310) 544 2167

November 11, 2021

Mr. Louis Ortega
Project Coordinator
City of Torrance
20500 Madrona Ave.
Torrance CA 90503

Certified Asbestos Inspector Name: Lina Sok
CSST #: 15-5499
Certification Expiration Date: November 17, 2021
Date of Sampling Report: June 15, 2021
Phone Number: 310 544 1837
Email Address: linasok@ellisenvironmental.com

RE: Bulk Sampling for Asbestos and Lead
Restrooms
1520 Greenwood Ave, Torrance, CA 90503

1. Executive Summary

On November 1, 2021, Ellis conducted an inspection for possible asbestos- and lead-containing materials in the restrooms prior to planned fire alarm upgrades and renovation efforts. Results are summarized below. This report supplements Ellis Report #18-362.

- **No asbestos was detected** in grey window putty samples.
- **No lead above regulated levels** identified in 4" white ceramic wall tile or 4" peach ceramic wall tile.

See results section below and Tables 1 and 2 attached for a complete list of material and locations sampled.

During subsequent renovation efforts, initiate wall and ceiling demolition carefully. Inspect inner wall and ceiling spaces. Sample and analyze any exposed pipe insulation (or other exposed materials) prior to disturbance.

2. Methodology

All samples were collected by Lina Sok (CSST # 15-5499, CDPH # 2591). Each sample was placed in a sealed container and provided with a unique identifying number. Samples were transported to an EPA/NVLAP – accredited laboratory and analyzed by the following methods as appropriate for the sampled material:

- Asbestos. 40 CFR Part 763, Subpart F, Appendix A. (AHERA Final Rule). Results expressed in percent of measured area.
- Lead in Ceramic Tile. TTLC (Total Threshold Limit Concentration).

3. Inaccessible Areas

Sampling was limited to client-specified materials and locations. (See drawings and Section 1

above.) There is a chance that additional suspect materials (e.g. pipe insulation above hard ceilings) may be exposed during renovation or demolition efforts. Such materials, if not identified in this report, should be sampled and analyzed prior to disturbance.

4. Results

Refer to the attached drawing and laboratory analysis reports.

Asbestos

- **No asbestos was detected** in grey window putty samples.

See Table 1 attached for complete list of materials sampled.

Removal of any material containing asbestos in an amount greater than one percent is regulated under EPA-SCAQMD Rule 1403, 29 CFR 1926.1101 (federal OSHA) and other state and local guidelines. Removal of any material containing asbestos in an amount greater than 0.1 percent is also regulated, under Cal-OSHA Title 8 Section 1529. Prior to renovation or demolition, retain a licensed abatement contractor to remove asbestos materials identified.

Initiate renovation or demolition carefully; Older, original materials may also be exposed during renovation or demolition practices. If not identified in this report they should be sampled prior to disturbance.

Lead

- **No lead above regulated levels** identified in:
  - 4" white ceramic wall tile (4.1 mg/kg)
  - 4" peach ceramic wall tile (3.1 mg/kg)

Disturbance of lead-based paints and ceramic tile – particularly those efforts involving manual demolition, mechanical abrasion, torching or cutting – should be performed by a licensed abatement contractor.

For materials containing <0.06 % by wt. or <50 mg/kg lead (not lead-based), avoid mechanical grinding or torching of lead-containing surfaces. No other special precautions.

5. Statement of Independence

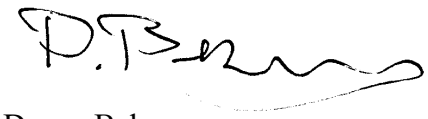
Ellis is a privately-held company and is not affiliated with any financial institution or other corporate entity. Ellis is retained as an independent contractor to provide objective, impartial investigation or analytical services regarding environmentally regulated hazardous or toxic materials. This report is not an endorsement or rejection of any specific methods used in handling or transport of potentially hazardous chemicals. Nor is intended as a complete hazardous materials survey of the entire building or facility. Ellis provides independent testing for asbestos, lead, indoor air contaminants and other potentially hazardous materials. The company and its employees are certified and licensed to practice in the State of California. Retained laboratories are accredited by the EPA (AREAL), NIOSH (AIHA), and the California Air Resources Board (CARB).

Respectfully Submitted:
ELLIS ENVIRONMENTAL MANAGEMENT, INC.

Prepared by:

Lina Sok
Industrial Hygienist
CSST #15-5499
CDPH #2591

Reviewed by:



Duane Behrens
President, Environmental Professional
CAC #92-0226
CDPH #4899

Proj. No.: 21-401

Distribution:
Louis Ortega

Non-asbestos grey window putty.

No lead above regulated levels in 4” ceramic white or peach wall tiles.

REF.	MATERIAL	MATERIAL LOCATION	FRIABLE	DAMAGE	% ASB	QTY*	UNIT
	IDENTIFIED ASBESTOS MATERIALS						
	none identified						
	NON-ASBESTOS MATERIALS						
A1	grey window putty	restroom exterior	-	-	none detected	-	s.f.
A2	grey window putty	restroom exterior	-	-	none detected	-	s.f.
A3	grey window putty	restroom exterior	-	-	none detected	-	s.f.
Not a complete survey; only client-specified materials were sampled.							
* listed quantities are not for bidding purposes. Field verify.							

Table 1
Asbestos Results Summary
Restrooms
1520 Greenwood Ave.
Torrance, CA 90503

Sample Date: 11/1/2021
Proj. # 21-401

SAMPLE #	***MATERIAL***	***LEAD RESULTS***		
L1	4" white ceramic wall tile	4.1 mg/kg	0.0004	% by weight
L2	4" peach ceramic wall tile	3.1 mg/kg	0.0003	% by weight
	Not a complete survey; only client-specified materials and locations were sampled. See report text.			

Table 2

Lead Results Summary
Restrooms
1520 Greenwood Ave.
Torrance, CA

SHEET 1 OF 1
Proj. #21-401
Sample Date: 11/1/21

Ellis

State of California—Health and Human Services Agency

California Department of Public Health

LEAD HAZARD EVALUATION REPORT

21-401

Section 1 — Date of Lead Hazard Evaluation 11/1/21

Section 2 — Type of Lead Hazard Evaluation (Check one box only)

☐ Lead Inspection ☐ Risk assessment ☐ Clearance Inspection ☒ Other (specify) pre-renovation bulk sampling

Section 3 — Structure Where Lead Hazard Evaluation Was Conducted

Address [number, street, apartment (if applicable)]	City	County	Zip Code
1520 Greenwood Ave.	Torrance	Los Angeles	

Construction date (year) of structure	Type of structure	Children living in structure?
N/A	☐ Multi-unit building ☒ School or daycare ☐ Single family dwelling ☐ Other	☐ Yes ☒ No ☐ Don't Know

Section 4 — Owner of Structure (if business/agency, list contact person)

Name	Telephone number
Louis Ortega - City of Torrance	310-953-1355

Address [number, street, apartment (if applicable)]	City	State	Zip Code
20500 Madrona Ave.	Torrance	CA	90503

Section 5 — Results of Lead Hazard Evaluation (check all that apply)

☐ No lead-based paint detected ☐ Intact lead-based paint detected ☐ Deteriorated lead-based paint detected

☐ No lead hazards detected ☐ Lead-contaminated dust found ☐ Lead-contaminated soil found ☒ Other non-hazardous ceramic tiles

Section 6 — Individual Conducting Lead Hazard Evaluation

Name	Telephone number
Duane Behrens	310-544-1837

Address [number, street, apartment (if applicable)]	City	State	Zip Code
430 Silver Spur Road Suite 201	Rancho Palos Verdes	CA	90275

CDPH certification number	Signature	Date
4899	Duane Behrens	11/11/21

Name and CDPH certification number of any other individuals conducting sampling or testing (if applicable)

Lina Sok #2591

Section 7 — Attachments

A. A foundation diagram or sketch of the structure indicating the specifc locations of each lead hazard or presence of lead-based paint;
B. Each testing method, device, and sampling procedure used;
C. All data collected, including quality control data, laboratory results, including laboratory name, address, and phone number.

First copy and attachments retained by inspector

Second copy and attachments retained by owner

Third copy only (no attachments) mailed or faxed to:

California Department of Public Health
Childhood Lead Poisoning Prevention Branch Reports
850 Marina Bay Parkway, Building P, Third Floor
Richmond, CA 94804-6403
Fax: (510) 620-5656

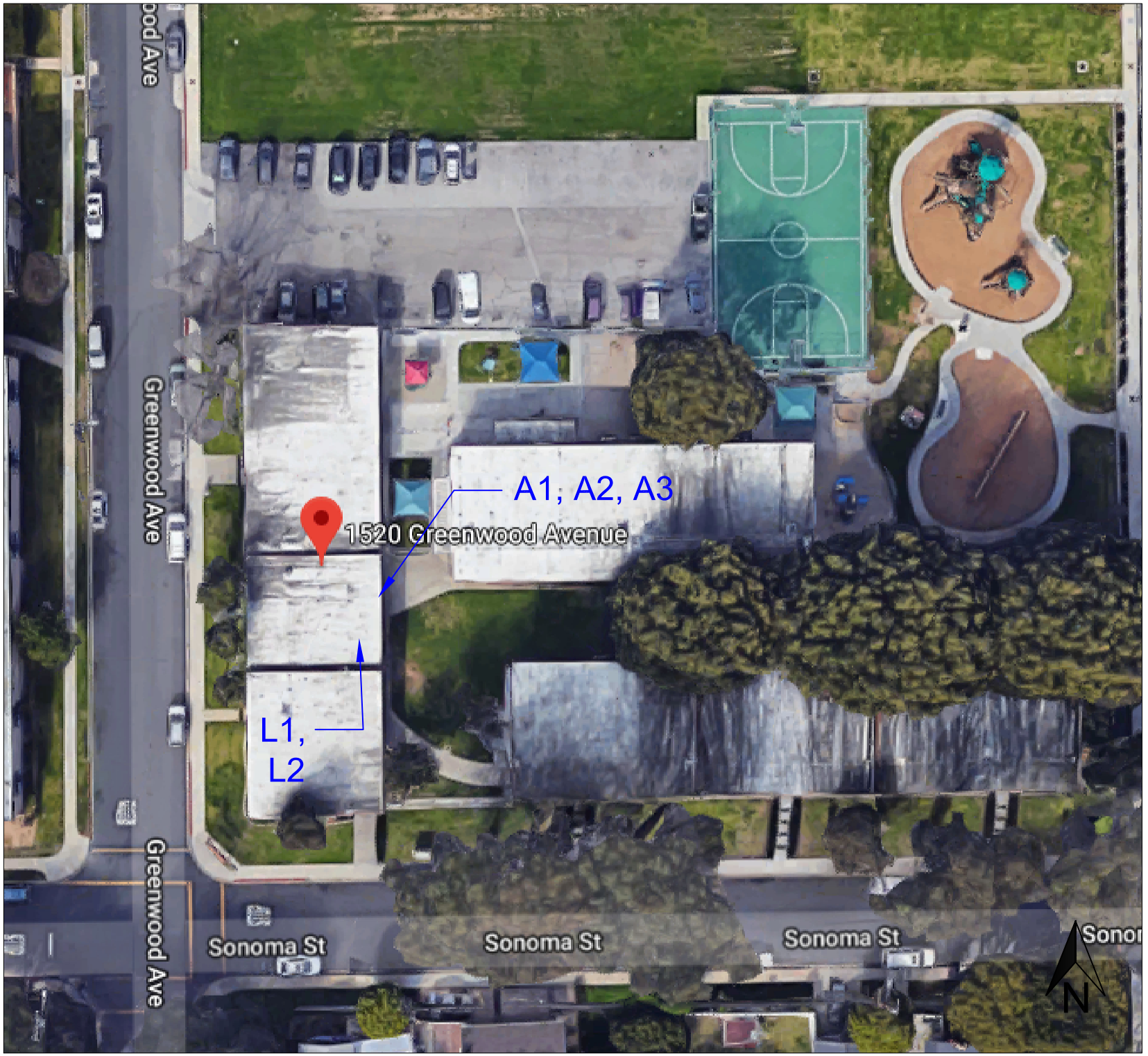


Figure 1: Sample Locations
Restrooms
1520 Greenwood Ave.
Torrance, CA 90503

Firm Name and Address

Ellis Environmental Mgmt, Inc.
430 Silver Spur Rd., Suite 201
Rancho Palos Verdes, CA 90275

Client Name and Address

City of Torrance
3031 Torrance Blvd.
Torrance, CA 90503

Project #	Sheet
21-401	1 of 1
Date: 11/1/2021	

Ellis

State of California
Division of Occupational Safety and Health

Certified Site Surveillance Technician

Lina Sok
Name

Certification No. 15-5499

Expires on 11/17/21

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

California Department of PublicHealth

STATE OF CALIFORNIA
DEPARTMENT OF PUBLIC HEALTH

LEAD-RELATED CONSTRUCTION CERTIFICATE

INDIVIDUAL:	CERTIFICATE TYPE:	NUMBER:	EXPIRATION DATE:
 Lina Sok	Lead Sampling Technician	LRC-00002591	12/29/2021

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

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

PLM Bulk Asbestos Report

Ellis Environmental Management, Inc.
Attn: Duane Behrens
430 Silver Spur Road
Suite 201
Rancho Palos Verdes, CA 90275

Date Received 11/01/21
Date Examined 11/02/21

AmeriSci Job # 921111008
P.O. #
Page 1 **of** 1

RE: 21-401; City Of Torrance; 1520 Greenwood Ave.; Restrooms

Client No. / HGA	Lab No.	Asbestos Present	Total % Asbestos
A1	921111008-01	***No***	NAD (by CVES) by Madeline Cumad on 11/02/21
Location: Grey Window Putty			
Analyst Description: Gray/Beige, Heterogeneous, Non-Fibrous, Window Putty			
Asbestos Types:			
Other Material: Non-fibrous 100%			
A2	921111008-02	***No***	NAD (by CVES) by Madeline Cumad on 11/02/21
Location: Grey Window Putty			
Analyst Description: Gray/Beige, Heterogeneous, Non-Fibrous, Window Putty			
Asbestos Types:			
Other Material: Non-fibrous 100%			
A3	921111008-03	***No***	NAD (by CVES) by Madeline Cumad on 11/02/21
Location: Grey Window Putty			
Analyst Description: Gray/Beige, Heterogeneous, Non-Fibrous, Window Putty			
Asbestos Types:			
Other Material: Non-fibrous 100%			

Reporting Notes:

Analyzed by: Madeline Cumad
Date: 11/2/2021

Reviewed by: Laurie A. Noble

*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.

921111008

Ellis ENVIRONMENTAL MANAGEMENT INC.

430 Silver Spur Road, Suite 201
Rancho Palos Verdes, CA 90275
(310) 544-1837 (tel)
(310) 544-2167 (fax)

Project No.: 21-401

Client: CITY OF TORRANCE

Location: 1520 GREENWOOD AVE. - RESTROOMS

Sampler: LS

Sheet 1 of 1

CHAIN OF CUSTODY RECORD

Sample Number	Description	Date	Time	H20	Air	Solid	Stop At First Positive Layer	Tests Required
L1	4" WHITE CER. WALL TILE	11/1/21	AM			X		TTLC - LEAD
L2	4" PEACH CER. WALL TILE	↓	↓			↓		↓
A1	GREY WINDOW PUTTY						X	PLM-ASBESTOS
A2	↓						↓	↓
A3	↓	↓	↓			↓	↓	↓

Turnaround: ____ same day ____ 24 hrs. ____ 48 hrs. ____ 3 days X 5 days (Standard) ____ 2 weeks

Special Instructions:

Date	Time	Relinquished By	Received By
11/1/21	9:30	[signature]	CM 11/1/21 @ 1000

E1

AmeriSci Los Angeles
24416 S Main St., Ste. 308
Carson, CA 90745
Phone: (310) 834-4868 Fax: (310) 834-4772

Laboratory Report

Report Date: 11/9/2021
Workorder No: **421111008**

Customer: **Ellis Environmental Management, Inc.**
430 Silver Spur Road, Suit 201
Rancho Palos Verdes, CA 90275

Attention: Duane Behrens

Subject: **21-401; City Of Torrance; 1520 Greenwood Ave.; Restrooms**

Sample 1: **L1** Description: 4" White CER. Wall Tile
Collection Date: 11/01/2021 Received Date: 11/01/2021 Time: 10:00
Matrix: Solid

Parameter	Method	Results	Unit	PQL	Tech	Analysis Date	Qual
Lead, TTLC, ICP	EPA 3050B/6010B	4.1	mg/kg	1.0	MP	11/3/2021	

Sample 2: **L2** Description: 4" Peach CER. Wall Tile
Collection Date: 11/01/2021 Received Date: 11/01/2021 Time: 10:00
Matrix: Solid

Parameter	Method	Results	Unit	PQL	Tech	Analysis Date	Qual
Lead, TTLC, ICP	EPA 3050B/6010B	3.1	mg/kg	1.0	MP	11/3/2021	

AmeriSci Reporting Limit is represented by the PQL. The analytical results within this report relate only to the specific compounds and samples investigated, and may not necessarily reflect other apparently similar material from a similar location. This report shall not be reproduced, except in full, without the written approval of AmeriSci Los Angeles. All analytical Batch data met quality control criteria unless other wise noted.

To the best of my knowledge this report is true and accurate.

Authorized by/Title: _____ Date: 11/9/2021
Minh Phung / Metal Superv.

421111008

Ellis ENVIRONMENTAL MANAGEMENT INC.

430 Silver Spur Road, Suite 201
Rancho Palos Verdes, CA 90275
(310) 544-1837 (tel)
(310) 544-2167 (fax)

Project No.: 21-401

Client: CITY OF TORRANCE

Location: 1522 GREENWOOD AVE, -RESTROOMS

Sampler: LS

Sheet 1 of 1

CHAIN OF CUSTODY RECORD

Sample Number	Description	Date	Time	H20	Air	Solid	Stop At First Positive Layer	Tests Required
L1	4" WHITE CER. WALL TILE	11/1/21	AM			X		TTLC - LEAD
L2	4" PEACH CER. WALL TILE	↓	↓			↓		↓
M1	GREY WINDOW PUTTY						X	PLM-ASBESTOS
M2	↓						↓	↓
M3		↓	↓			↓	↓	

Turnaround: ____ same day ____ 24 hrs. ____ 48 hrs. ____ 3 days ___X___ 5 days (Standard) ____ 2 weeks

Special Instructions:

Date	Time	Relinquished By	Received By
11/1/21	9:30		ELM 11/1/21 @ 1000

APPLICABLE REGULATIONS – ASBESTOS

Current state and federal regulations pertaining to asbestos are summarized below. The summary is not all-inclusive, and does not address specific removal or disposal requirements for individual materials.

NESHAPS

The National Emission Standard for Hazardous Air Pollutants (NESHAP), regulation 40 CFR Part 61, states that no visible emissions are allowed during building demolition or renovation activities which involve regulated asbestos-containing materials (RACMs). All buildings, regardless of construction date, must be surveyed for ACMs prior to demolition or renovation. The US EPA and/or the local air quality management district which implements US EPA actions must be notified prior to any building demolition, even if no ACMs are present. An ACM is defined as any material with an asbestos content of greater than one percent and which (a) is friable, or (b) Category I non-friable ACM that has or will become friable, or (c) Category II friable ACM that may become or will become crumbled, pulverized, or reduced to powder by the forces expected to act on the material in the course of demolition or renovation.

According to NESHAP, ACM is material containing more than one percent asbestos as determined using the methods specified in Appendix A, Subpart E, 40 CFR Part 763, Section 1, PLM. The NESHAP classifies ACM as friable or non-friable. Friable ACM is ACM that contains more than one percent asbestos and when dry, can be crumbled, pulverized, or reduced to powder by hand pressure.

Non-friable ACM also contains more than one percent asbestos and is further classified as either Category I ACM or Category II ACM. The materials are distinguished by their potential to release fibers when damaged. Category I ACMs are much more likely to release fibers when damaged.

In accordance with the US EPA's NESHAP regulation, facilities planned for renovation or demolition must be surveyed for the total amount of asbestos materials, which must be categorized as friable, Category 1 non-friable, and Category 2 non-friable ACMs.

Southern California Air Quality Management District (SCAQMD)

The SCAQMD is a government agency that regulates sources of air pollution within the area of the Los Angeles and surrounding counties. The District's regulating and enforcement authority comes from federal law. In response to the NESHAP requirements, the SCAQMD implemented Rule 1403 to specify work practice requirements to limit asbestos emissions from building demolition and renovation activities, including the removal and associated disturbance of asbestos-containing materials (ACM). The requirements for demolition and renovation activities include asbestos surveying, notification, ACM removal procedures and time schedules, ACM handling and clean-up procedures, and storage, disposal, and landfilling requirements for asbestos-containing waste materials (ACWM). All operators are required to maintain records, including waste shipment records, and are required to use appropriate warning labels, signs, and markings.

AHERA

The Asbestos Hazard Emergency Response Act (AHERA) requires performance of asbestos surveys and the development of Asbestos Management Plans for all of the nation's primary and secondary schools. The general procedures mandated under AHERA are considered the industry standard and are applied to all surveys performed.

Cal-OSHA

Per Cal-OSHA standards, 1926.1101, Asbestos-Containing Construction Materials (ACCMs) are defined as any material with an asbestos content greater than one-tenth of one percent (>0.1%). Cal-OSHA sets forth work requirements for disturbance of ACCMs including removal operations for all types of ACCMs. The requirements have been classified as Class I, Class II, Class III, or Class IV Asbestos related work. The classes are distinguished by their potential to release fibers. Cal-OSHA prescribes specific engineering controls and work practices for each Class of Asbestos related Work.

1. Class I – This Class refers to removal of ACMs identified as Thermal System Insulation (TSI) or surfacing (sprayed-on or troweled-on) materials. These materials are generally considered friable.
2. Class II – This Class refers to removal of ACMs identified that are not TSI or surfacing materials. These materials are generally considered non-friable.
3. Class III – This Class refers to repair and maintenance operations of all identified ACMs.
4. Class IV – This Class refers to incidental contact with identified ACMs such as custodial staff.

California Health and Safety Code

The California Health and Safety Code 25915 (former Connelly Bill) requires all building owners in the State of California to provide written notification to employees, tenants, and contractors of the presence and location of ACCMs within their buildings. Some exclusion to the notification rule for restricted access areas is allowed. All documentation related to asbestos surveys (and air monitoring) must be made available to employees, tenants, or contractors for review. ACCMs are defined as any materials with an asbestos content greater than one-tenth of one percent (>0.1%). The California Health and Safety Code also require that a seller with any knowledge of ACMs on a property disclose such information or knowledge to other parties involved in a real estate transaction.

Building Demolition / Renovation

In accordance with the US EPA's NESHAPs regulation and the SCAQMD, all structures planned for renovation or demolition must be surveyed for ACMs prior to the planned renovation or demolition. Subsequent removal of identified ACMs is also required. Removal involves, to the greatest extent practical, the complete removal, disposal, and replacement, if necessary, of the ACMs. Removal usually also requires encapsulation of the remaining structure to lock down residual fibers which may exist. Removal of ACMs is required prior to renovation and/or demolition activities. The US EPA and SCAQMD require removal of all RACMs prior to demolition or renovation. RACMs include friable and non-friable (Category I and II) which have or will become friable by demolition or renovation activities.

APPLICABLE REGULATIONS – LEAD

California Title 8. Industrial Relations, Division 1, Department of Industrial Relations, Chapter 4, Division of Industrial Safety, Subchapter 4, Construction Safety Orders, Article 4, Dusts, Fumes, Mists, Vapors, and Gases, §1532.1, Lead.

This section applies to all construction work where an employee may be occupationally exposed to lead. All construction work excluded from coverage in the general industry standard for lead by section 5198(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 following:

(1) Demolition or salvage of structures where lead or materials containing lead are present;
(2) Removal or encapsulation of materials containing lead;
(3) New construction, alteration, repair, or renovation of structures, substrates, or portions thereof, that contain lead, or materials containing lead;
(4) Installation of products containing lead;
(5) Lead contamination/emergency cleanup;
(6) Transportation, disposal, storage, or containment of lead or materials containing lead on the site or location at which construction activities are performed, and
(7) Maintenance operations associated with the construction activities described in this subsection.

California Health & Safety Code 17961 et al.
Deems a building to be in violation of state law if it contains lead hazards, and requires local enforcement agencies to enforce provisions related to lead hazards. Makes it a crime for a person to engage in specified acts related to lead hazard evaluation, abatement, and lead-related construction courses unless certified or accredited by the Department. Permits local enforcement agencies to order the abatement of lead hazards or issue a cease and desist order in response to lead hazards.

California Labor Code 6716 to 6717 Lead-Related Activities in Construction Work
Provides for the establishment of standards that protect the health and safety of employees who engage in lead-related construction work, including construction, demolition, renovation and repair.

California Code of Regulations, Title 17, Section 35001
Includes requirements for lead hazard evaluation and abatement activities, accreditation of training providers, and certification of individuals engaged in lead-based paint activities.

LEAD - "TRIGGER TASKS"

(SOURCE: California Title 8 Section 1532.1.)

Following testing, Construction Managers and Superintendents may use the following to decide whether (and for how long) an abatement contractor should be retained during disturbance of painted surfaces.

Paint Categories

1. Lead-Based. >.06% Lead by Weight. Start-to-finish, retain an abatement contractor to perform trigger tasks listed below.
2. Lead-Containing. 0.009 – 0.06% lead by weight. Avoid torching or mechanical grinding; no other special precautions.
3. Non-Lead-Containing <.009% lead by weight. No special lead-related precautions required.

TRIGGER TASKS - Lead-Based Paints Only:

Lowest Exposure Trigger Tasks:

Unless proven otherwise (Negative Exposure Assessment, or "NEA"), assume exposures greater than 50 and up to 500 µg/m3 where lead-based coatings or paint are present:

- manual demolition of structures
- manual scraping
- manual sanding
- heat gun applications
- power tool cleaning with dust collection system
- spray painting with lead
- any other task where employees may be exposed over the PEL.

Medium Exposure Trigger Tasks:

Unless proven otherwise (NEA), assume exposures greater than 500 and up to 2,500 µg/m3 where lead-based coatings or paint are present:

- use of lead-containing mortar
- lead burning
- rivet busting
- power tool cleaning without dust collection systems
- cleanup of dry expendable abrasives
- abrasive blasting enclosure movement and removal

Highest Exposure Trigger Tasks:

Assume exposures greater than 2,500 µg/m3 unless proven otherwise where lead-based coatings or paint are present:

- abrasive blasting
- welding
- cutting
- torch burning