



April 3, 2020

RAE Project ID: R201499

Ameriprise Insurance  
**Attn: Claims Department**  
P.O. Box 19018  
Green Bay, Wisconsin 54307-9018  
**Claim No. 2815751BT505**  
**Code Blue Control No. 480041**

**RE: Limited Asbestos Survey and XRF Lead Inspection Report**  
**Rubin Residence**  
**6363 Rancho Mission Road, Unit 3**  
**San Diego, California 92108**

## **1.0 Introduction**

On the date of April 2, 2020, Rarefied Air Environmental (RAE) conducted a limited asbestos survey and X-Ray Fluorescence (XRF) lead inspection at the above referenced property. RAE collected bulk samples of building materials suspected to contain asbestos which are to be impacted during remediation activities as a result of the recent water intrusion. Additionally, RAE performed a limited XRF lead inspection of the painted surfaces or surface coatings to also be impacted during remediation activities.

All field activities were performed by Thomas Copich, a representative of RAE and California Division of Occupational Safety and Health (DOSH) Certified Asbestos Consultant; (CAC#16-5804) and California Department of Public Health (CDPH) Certified Lead Inspector/Risk Assessor; (CDPH #24843).

## **2.0 Asbestos Laboratory Accreditation & Analytical Methods**

Samples collected for asbestos content were analyzed by Environmental Protection Agency (EPA) Method 600/R-93/116 and/or 600/M4-82-020 per the Code of Federal Regulations (CFR) Title 40 *Part* 763.86 using Polarized Light Microscopy (PLM) by the following independent and accredited laboratory:

- Patriot Environmental Laboratory Services, Inc. - 6640 Lusk Boulevard, Building A, Suite 100 - 101, San Diego, California 92121. National Institute of Standards and Technology/National Voluntary Laboratory Accreditation Program (NIST/NVLAP) Lab Code (200982-0).

## **3.0 ASBESTOS**

### **3.1 Asbestos Sampling Protocol**

Sampling activities were performed in compliance with the National Emissions Standard for Hazardous Air Pollutants (NESHAP) regulation 40 CFR (Code of Federal Regulations), Part 61, Subpart M. The Environmental Protection Agency (EPA) has designed a protocol in which the sampling of suspect materials is to take place. Materials shall be considered homogeneous if they are similar in color and texture. A homogenous material shall be considered to contain asbestos if any of the samples collected representing that material indicate the presence of asbestos. Contrarily, a homogenous material shall be considered to not contain asbestos only if all of the samples collected representing that material indicate the absence of asbestos.

The EPA and California Occupational Safety and Health Administration (Cal-OSHA) have defined building materials containing asbestos as follows:

- **Asbestos-Containing-Material (ACM)** - any material containing greater than 1 percent (>1%) asbestos as determined by PLM, *40 Code of Federal Regulations (CFR) Part 61, Subpart M*.
- **Asbestos-Containing-Construction-Material (ACCM)** - any material containing less than one percent (<1%) asbestos and greater than one tenth of one percent (>0.1%) asbestos by weight, *California Code of Regulations (CCR), Title 8, Section 1529*.

### 3.2 Asbestos Sample Results

RAE collected a total of five (5) bulk samples for asbestos content. In accordance with EPA bulk sampling method protocols, the laboratory must separate and analyze all layers within a single sample, resulting in additional sample analysis.

**No asbestos was detected** in any of the samples collected based on the limitations of the analytical method. The following table summarizes the building materials samples that were found to contain **no asbestos** based on the limitations of the analytical method:

**Table I: Materials with No Asbestos Detected**

Sample #	Material	Material Location
001 - 005	Drywall and joint compound	Hallway, Hallway Bathroom and Master Bathroom

#### Legend

\* - Material contains trace amounts of asbestos and may be regulated under Cal/OSHA guidelines as an ACCM. The material may be required to be removed by an asbestos licensed contractor. However, the material is not considered asbestos waste.

CH – Chrysotile Asbestos

NAD – No Asbestos Detected

G = Good, D = Damaged, SD = Significantly Damaged

Friable- any material that can be crumbled, pulverized or reduced to powder by hand pressure.

A copy of the asbestos PLM analytical results and chain of custody are included as an attachment to this document.

### 3.3 Asbestos Recommendations

**Due to the absence of asbestos in the above referenced materials, a California state licensed asbestos abatement contractor will not be required to remove the above referenced materials** to be disturbed as a result of planned or other renovations to the subject property.

### 3.4 Disposal

Any materials containing greater than 1% asbestos are subject to regulations under EPA (National Emission Standards for Hazardous Air Pollutants [NESHAP]) governing the storage, transportation and disposal of **hazardous waste**. If any materials contain less than 1% asbestos (and no lead-based paint is present), these materials may be properly bagged and disposed of as construction debris. If neither asbestos nor lead-based-paint is present, the material may be disposed of as construction debris.

NESHAP has allowed for the composite sampling of drywall and joint compound for disposal purposes *only*. If the drywall and joint compound composite sample results indicate a content of less than (<) 1% asbestos, the drywall and joint compound may be properly bagged and disposed of as construction debris, regardless of the asbestos content of the joint compound itself. If the drywall and joint compound composite

sample results indicate a content of greater than (>) 1% asbestos, then this material must be disposed of as hazardous waste. If the drywall and joint compound contain a texture coating with an asbestos content greater than (>) 1%, the drywall and joint compound with texture coating must be disposed of as hazardous waste.

## 4.0 LEAD

### 4.1 XRF Lead Inspection

RAE conducted a limited XRF lead inspection utilizing the Niton XLp 300A portable analyzer (Serial No. 16320). The purpose of the inspection was to determine if lead is present in the surfaces to be potentially disturbed. HUD Guidelines require a lead survey to occur on any structure built prior to the year 1978. *The City of San Diego requires that a lead survey be conducted on any structure built prior to the year 1979.*

Results indicated by way of XRF analysis are provided in mg/cm<sup>2</sup>. Lead levels as determined by way of XRF analysis are defined as follows:

- **The City of San Diego-** defines lead-based paint as any paint or other surface coating containing greater than or equal to ( $\geq$ ) 0.5 mg/cm<sup>2</sup>
- **The County of San Diego-** defines lead-based paint as any paint or other surface coating containing greater than or equal to ( $\geq$ ) 1.0 mg/cm<sup>2</sup>
- **The reporting limit of detection for the Niton XLp 300A is 0.05 mg/cm<sup>2</sup>.** It can be determined that any paint or surface coating with a minimum reading of 0.05 mg/cm<sup>2</sup> contains lead. However, the actual amount of lead present in that particular paint or surface coating cannot be determined without the submission of a physical paint chip sample for analysis to an independent and accredited laboratory. *Conversely, any reading that is less than the reporting limit of detection of 0.05 mg/cm<sup>2</sup> cannot be assumed to be lead free.* Lead paint chips were not submitted as part of this limited XRF lead inspection.

### 4.2 XRF Lead Inspection Results

Please review the following table for a summary of the XRF lead results collected on site:

**Table II: Summary of XRF Lead Results**

No.	Type	Units	Location	Component	Substrate	Color	Side	Res	Results	Action Level	PbC	PbC Error
62	SHUTTER_CAL	cps						400.03			1.33	0
63	CALIBRATION	mg / cm ^2							Positive	0.5	1.2	0.7
64	CALIBRATION	mg / cm ^2							Positive	0.5	1.1	0.4
65	CALIBRATION	mg / cm ^2							Positive	0.5	1.1	0.4
66	PAINT	mg / cm ^2	Hallway Bathroom	Floor tile	Ceramic	Gray	A		Negative	0.5	0	0.02
67	PAINT	mg / cm ^2	Hallway Bathroom	Wall	Drywall	White	A		Negative	0.5	0	0.02
68	PAINT	mg / cm ^2	Hallway Bathroom	Wall	Drywall	White	B		Negative	0.5	0	0.02
69	PAINT	mg / cm ^2	Hallway Bathroom	Wall	Drywall	White	C		Negative	0.5	0	0.02
70	PAINT	mg / cm ^2	Hallway Bathroom	Vanity	Wood	White	D		Negative	0.5	0	0.02
71	PAINT	mg / cm ^2	Hallway Bathroom	Baseboard	Wood	White	D		Negative	0.5	0	0.02
72	PAINT	mg / cm ^2	Hallway	Wall	Drywall	White	A		Negative	0.5	0	0.02
73	PAINT	mg / cm ^2	Hallway	Wall	Drywall	White	C		Negative	0.5	0	0.02
74	PAINT	mg / cm ^2	Hallway	Ceiling	Drywall	White	C		Negative	0.5	0	0.02
75	CALIBRATION	mg / cm ^2							Positive	0.5	1	0.4
76	CALIBRATION	mg / cm ^2							Positive	0.5	1.2	0.5
77	CALIBRATION	mg / cm ^2							Positive	0.5	0.9	0.3

Shots 63-65 & 75-77 are for the purposes of calibration and are not representative of painted surfaces of the above referenced property. Side A is representative of the Front Entry and sides B-D follow clockwise from side A.

**No lead-based paints were found by way of the XRF analysis.** Although all readings were below the reporting limit of detection (0.05 mg/cm<sup>2</sup>), it cannot be determined that any surfaces are “lead free.” Cal-OSHA requires lead paint chip sampling to occur to determine whether a painted surface does not contain lead. *Lead paint chips were not collected as part of this limited XRF lead inspection.* Cal-OSHA also requires that initial employee exposure monitoring be conducted to evaluate work exposure during work that disturbs lead-containing material where lead is present in **any detectable level** (*CCR Title 8, Section 1532.1*). *The City of San Diego requires that any disturbance to paint containing 1,000 ppm or greater be performed with lead-safe work practices and that the contractor complete a Form es-127 and submit to the city upon completion.*

### 4.3 Disposal

If any lead-based paints were found at or above 1.0 mg/cm<sup>2</sup>, Total Threshold Limit Concentration (TTLC) sampling and analysis should occur for waste characterization purposes in California. However, if lead concentrations are <1.0 mg/cm<sup>2</sup> and the paint is present on non-asbestos-containing materials, the waste may be properly disposed of as construction debris.

### Limitations

Although Rarefied Air Environmental has taken several precautions in order to find all of the visible suspect asbestos-containing-materials and/or lead-containing-paints present, several factors can hinder the findings at the time of the survey. The following factors should always be considered:

- Additional suspect materials could be located between walls, in voids, or in other concealed areas previously inaccessible. If any suspect materials or painted surfaces are found which have not been represented in this report, RAE recommends that work stops until those materials can be sampled for asbestos and/or lead content. Furthermore, this is a limited survey. Additional suspect materials and paints may be present outside of the affected areas sampled.
- RAE does not warrant, guarantee or profess to have the ability to locate or identify all asbestos-containing materials in a facility.
- Confined spaces, and areas determined by RAE’s personnel as unsafe to access, are excluded from the scope of work.
- RAE is not responsible for the validity of the laboratory data. We merely interpret the results provided by the laboratory analysis.
- RAE does not guarantee or warrant that the facility or workplace is safe; nor does RAE’s involvement in this property relieve the Client, building owner/operator or tenant of any continuing responsibility of providing a safe facility or living space.
- This report was based on those conditions observed on the day the field evaluation was accomplished. In the event that changes in the nature of the property have occurred, or additional relevant information about the property is subsequently discovered, the findings contained in this report may not be valid unless these changes and additional relevant information are reviewed and the conclusion of this report is modified and verified in writing.

If you have any questions or concerns, feel free to contact the undersigned at 619.991.6654. On behalf of Rarefied Air Environmental, we would like to thank you for the opportunity to be of service.

Sincerely,  
**Rarefied Air Environmental, Inc.**



Matthew Zar  
Owner and Chief Executive Officer  
Certified Asbestos Consultant #11-4841  
CDPH Lead Inspector/Assessor #19386

Attachment A:  
Asbestos Analytical Data & Chain of Custody

Attachment B:  
Sample Locations Map

Attachment C:  
CDPH 8552 Form

**Attachment A**

**Asbestos Analytical Data & Chain of Custody**

Certificate of Analysis  
**PLM Asbestos Identification**

tel - 858-677-8900  
 free - 855-787-4522  
 fax - 858-677-9009  
 PatriotLab.com  
 6640 Lusk Blvd., Suite A-100, San Diego, CA 92121



Rarefied Air Environmental  
 9921 Carmel Mountain Road, 164  
 San Diego, CA 92129

Report Number: 810314  
 Project Number: Restoration RX  
 Project Name: Rubin Residence  
 Project Location: 6363 Rancho Mission Road Unit 3  
 San Diego, CA 92108

Date Collected: 4/2/2020  
 Date Received: 4/2/2020  
 Date Analyzed: 4/2/2020  
 Date Reported: 4/2/2020

Collected By: Thomas Copich  
 Claim Number:  
 PO Number:  
 Number of Samples: 5

Lab/Client ID/Layer	Location	Material Description	Color	Composition (%)
810314-001 001	Hallway Bathroom - Sink Area	Drywall	White	85% Sulfate 12% Cellulose 3% Glass Fibers
<b>Total Asbestos</b>	<b>None Detected</b>			
810314-002 002	Hallway Bathroom - Sink Area	Drywall and Joint Compound Composite	White	80% Sulfate 10% Cellulose 6% Carbonate 2% Glass Fibers 2% Paint
<b>Total Asbestos</b>	<b>None Detected</b>			
810314-003 003	Hallway Bathroom - Sink Area	Joint Compound	White	94% Carbonate 6% Paint
<b>Total Asbestos</b>	<b>None Detected</b>			
810314-004 004	Hallway Bathroom - Entry Wall	Joint Compound	White	94% Carbonate 6% Paint
<b>Total Asbestos</b>	<b>None Detected</b>			
810314-005 005	Hallway Ceiling	Joint Compound	White	94% Carbonate 6% Paint
<b>Total Asbestos</b>	<b>None Detected</b>			

Certificate of Analysis  
**PLM Asbestos Identification**

tel - 858-677-8900  
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Lab/Client ID/Layer	Location	Material Description	Color	Composition (%)
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Emily Lopez - Analyst



Michelle Lavallee - Approved By

Bulk sample(s) submitted was (were) analyzed in accordance with the procedure outlined in the US Federal Register 40 CFR 763, Subpart F, Appendix A; EPA-600/R-93/116 (Method for Determination of Asbestos in Building Materials), and EPA-600/M4-82-020 (US EPA Interim Method for the Determination of Asbestos in Bulk Insulation Samples). Samples were analyzed using Calibrated Visual Estimations (CVES); therefore, results may not be reliable for samples of low asbestos concentration levels. Samples of wall systems containing discrete and separable layers are analyzed separately and reported as composite unless specifically requested by the customer to report analytical results for individual layers. This report applies only to the items tested. Results are representative of the samples submitted and may not represent the entire material from which the samples were collected. "None Detected" means that no asbestos was observed in the sample. "<1%" (less than one percent) means that asbestos was observed in the sample but the concentration is below the quantifiable level of 1%. This report was issued by a NIST/NVLAP (Lab Code 200982-0) and CADOHS- ELAP (Cert. No. 2805) accredited laboratory and may not be reproduced, except in full without the expressed written consent of Patriot Environmental Laboratory Services, Inc. This report may not be used to claim product certification, approval or endorsement by NIST, NVLAP, ELAP or any government agency.

Asb\_Rep\_8.14


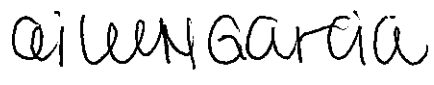




**Customer Name:** Restoration RX  
**Project Name:** Rubin Residence  
**Project Address:** 6363 Rancho Mission Road, Unit 3, San Diego, CA 92108  
**Date:** 4.2.2020

810314

**ASBESTOS SURVEY WORKSHEET & CHAIN OF CUSTODY**

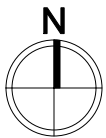
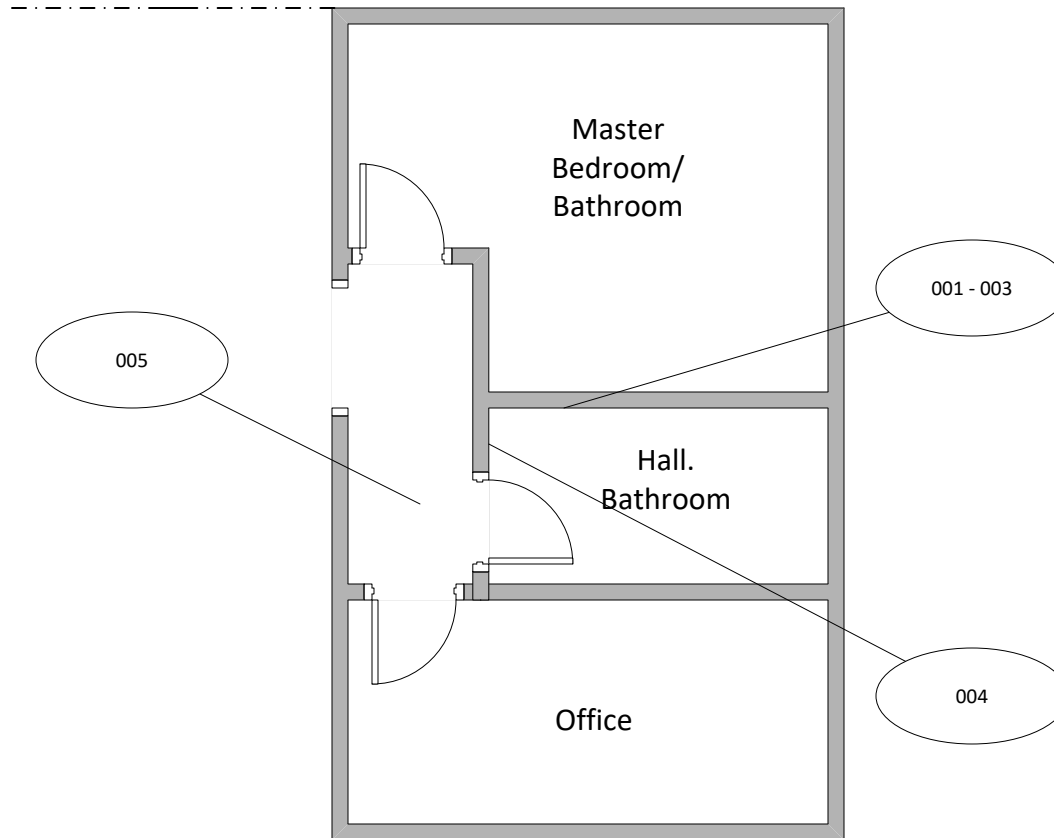
Sample #	Homo Material	Material Description	Sample Location	Material Location	Est. Quantity	Condition (G, D, SD)	Friable (Y/N)
001	A	Drywall	Hallway Bathroom -- Sink area	Hallway, Hallway Bathroom, Master Bathroom	200 ft. <sup>2</sup>	G	N
002	A	DW/JC composite	Hallway Bathroom -- Sink area				
003	A	Joint compound	Hallway Bathroom -- Sink area				
004	A	Joint compound	Hallway Bathroom -- Entry wall				
005	A	Joint compound	Hallway Ceiling				
<b>Laboratory:</b>		<b>Turnaround Time:</b>	<b>PLM Analysis:</b>		<b>Results to:</b>		
Patriot Environmental		4 hrs.	PLM EPA 600/R-93/116 and/or 600/M4-82-020 Please stop at 1 <sup>st</sup> positive (>1%) and analyze all layers.		rareairenv@gmail.com testmyair@gmail.com		
<b>Relinquished by:</b>			<b>Received by &amp; Time:</b>				
Thomas Copich Certified Asbestos Consultant #16-5804			 				

\*RUSH\*

2 APR 28 10:37 AM

**Attachment B**  
**Sample Locations Map**

**Asbestos Bulk Sample Locations Map**



**Attachment C**  
**CDPH 8552 Form**

## LEAD HAZARD EVALUATION REPORT

**Section 1 — Date of Lead Hazard Evaluation: 4.2.2020**

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

Lead Inspection   
  Risk assessment   
  Clearance Inspection   
  Other (specify) Limited Survey

**Section 3 — Structure Where Lead Hazard Evaluation Was Conducted**

Address [number, street, apartment (if applicable)] 6363 Rancho Mission Road, Unit 3	City San Diego	County San Diego	Zip Code 92108
Construction date (year) of structure 1978	Type of structure <input checked="" type="checkbox"/> Multi-unit building <input type="checkbox"/> School or daycare <input type="checkbox"/> Single family dwelling <input type="checkbox"/> Other _____	Children living in structure? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Don't Know	

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

Name Unknown	Telephone number Unknown		
Address [number, street, apartment (if applicable)] Unknown	City	State	Zip Code

**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 \_\_\_\_\_

**Section 6 — Individual Conducting Lead Hazard Evaluation**

Name: <b>Thomas Copich</b>	Telephone number <b>315.395.4312</b>		
Address: [number, street, apartment (if applicable)] <b>9921 Carmel Mountain Rd., #164</b>	City: <b>San Diego</b>	State: <b>CA</b>	Zip Code: <b>92129</b>
CDPH certification number: <b>24843</b>	Signature: 	Date: 4.2.2020	
Name and CDPH certification number of any other individuals conducting sampling or testing (if applicable)			

**Section 7 — Attachments**

- A. A foundation diagram or sketch of the structure indicating the specific 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