MEMORANDUM

Date: December 13, 2018

To: The Honorable Chairman and Members
Pima County Board of Supervisors

From: C.H. Huckelberry
County Administrator

Re: Agenda Item Number 8 on the December 18, 2018 Board of Supervisors Meeting
Agenda – Regional Flood Control District Board of Directors Purchase of Real Property
Resolution No. 2018-FC7

The attached Resolution authorizes staff to complete a real property transaction associated
with acquiring properties in the Christmas Wash watershed. (Attachment 1) The purchase
will be through a tax deed held by the State of Arizona for back taxes. State law allows the
Board of Supervisors to convey property held by the State through a treasurer’s deed to the
Regional Flood Control District for flood control purposes.

The property was conveyed through a Treasurer’s Deed to the State of Arizona due to
delinquent property taxes. The size of the parcel is 1.67 acres located near the northeast
corner of Dodge Boulevard and Seneca Street.

While the site is being acquired at no cost for flood control purposes, the site will have an
estimated cost of approximately $100,000 to demolish existing structures on the property
and to remediate the site based on environmental reports. The estimated cleanup costs
include asbestos removal, demolition and environmental cleanup. Costs for these items have
been determined from actual bids received for each component. For asbestos removal, there
was a single bid of $21,337. There was a range of bids from $59,395 to $108,604 for
demolition, and for environmental remediation the bids ranged from $13,433 to $14,885.
The sum of the low bid costs is approximately $95,000. Hence, the cost to acquire this
property is substantially less than the estimated value of the property after cleanup at
$225,000 to $250,000.

Since this is the first improved property requiring environmental remediation that we would
have acquired through this process, I am also enclosing the asbestos and environmental
report on each of the five buildings. (Attachment 2 and 3) Two of the buildings (Number 4
and 5) have no asbestos containing materials.

The property is being acquired to reduce flood hazards in the Christmas Wash drainage basin.
Nearly two years ago, this basin suffered significant flooding as a result of intense summer
The Honorable Chairman and Members, Pima County Board of Supervisors
Re: Agenda Item Number 8 on the December 18, 2018 Board of Supervisors Meeting
   Agenda – Regional Flood Control District Board of Directors Purchase of Real Property
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Thunderstorms resulting in property damage to real and improved properties. The Regional
Flood Control District (RFCD) has been assisting the City of Tucson in an overall study
process to reduce flood hazards within the basin. As can be seen in the aerial photographs,
the Christmas Wash watershed is urbanized (Attachment 4); hence, flood hazard reduction
through stormwater retention/detention is limited to developed properties within the basin.
The property will be repurposed and used as a detention/retention basin, which will be the
primary use of the property. The property will also serve as a natural pocket park for the
surrounding neighborhood.

Appropriate engineering studies have not yet been completed on the size and dimensions of
the detention basin; however, acquiring the property in the manner stated provides a
substantial savings to the RFCD for flood control benefits along the Christmas Wash.

The size and location of the property would be equivalent to removing six single-family
properties to provide stormwater detention/retention and flood control benefits. It is
estimated the cost to acquire a typical improved residential property within the basin would
be approximately $160,000; hence, property acquisition under a normal circumstance where
an improved property was acquired and demolished would be approximately $1 million.

The financial benefit associated with acquiring this property from the State via a Treasurer’s
Deed is that the cost is essentially the cost of demolition and remediation of the property.
The public benefits include flood hazard reduction, removal of blighted abandoned buildings
and overall neighborhood enhancement through property cleanup and conversion to a natural
park amenity.

CHH/anc

Attachments

c: Michael Ortega, City Manager, City of Tucson
   Carmine DeBonis, Jr., Deputy County Administrator for Public Works
   Suzanne Shields, Director, Regional Flood Control District
   Neil Konigsberg, Manager, Real Property Services
RESOLUTION NO. 2018 - ______

RESOLUTION OF THE PIMA COUNTY FLOOD CONTROL DISTRICT BOARD OF DIRECTORS, AUTHORIZING THE PURCHASE OF CERTAIN REAL PROPERTY FROM THE STATE OF ARIZONA FOR FLOOD CONTROL PURPOSES AS PART OF THE CHRISTMAS WASH WATERSHED MITIGATION IMPROVEMENTS

The Board of Directors of Pima County Flood Control District finds that:

1. The Pima County Flood Control District ("District") needs to purchase a certain parcel of real property held by the State of Arizona by tax deed (tax code # 122-16-171A), legally described in the attached Exhibit A (the "Property"), for flood control purposes as part of the Christmas Wash Watershed Mitigation Improvements.

2. The District will expend the costs associated with environmental remediation and demolition of the Property.

3. The District is authorized to purchase the Property from the State of Arizona and the Pima County Board of Supervisors is authorized to accept an offer from the District for the Property and to sell the Property to the District pursuant to A.R.S. §§ 42-18303(B).

NOW, THEREFORE, BE IT RESOLVED,

The purchase of the aforementioned parcel of real property by the District from the State of Arizona, in consideration of the District assuming all costs of remediation and demolition, is authorized and approved.

Passed and adopted, this __ day of __________, 2018.

Chairman, Pima County Flood Control District Board of Directors

ATTEST:

Clerk of the Board

APPROVED AS TO FORM

Deputy County Attorney

BOS Approval: 12/18/2018   S/T/R: 04/14/14   File TS-0009   Agent: TM
EXHIBIT "A"

PALO VERDE NO. 2 amended West 189 feet of South 264.42 feet of Lot 8 Block 1 also described as the South 264.42 feet of Lot 8 Block 1 of PALO VERDE ADDITION NO. 2, Pima County, Arizona, according to the plat of record in the office of the Pima County Recorder in Book 4 of Maps, Page 5. Except the East 125.9 feet thereof.
Asbestos Containing
Building Material Survey

Former Dickey & Sons Property
Residence at 3717 E. Seneca Street
(Bldg. #1)
Tucson, AZ

Report Date: October 5, 2018

SHC-T18651
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             Site Map

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             2.7  Analysis of Bulk Samples
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             Chain of Custodies

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INSPECTION INFORMATION SHEET

Inspection Firm: Southwest Hazard Control, Inc.
1953 West Grant Road
Tucson, Arizona 85745

Current Owner(s): Pima County Department of Environmental Quality
33 N. Stone Avenue #700
Tucson, AZ 85701

Site Address: 3717 E. Seneca Street (bldg. #1)

Date of Inspection: September 20, 2018

Laboratory: EMSL Analytical, Inc.
200 Route 130 North Cinnaminson
NJ 08077
Total Samples: 26
Analysis Date: September 29, 2018

Name of Inspector: Stanley P. Maxam

AHERA Certificate No: 08820342

Training Provider: ETC Compliance Solutions

Date of Expiration: December 19, 2018
2.0 INSPECTION REPORT

2.1 Introduction

Southwest Hazard Control, Inc. ("hereafter known as SHC") was contacted by Kimberly Baeva of the Pima County Department of Environmental Quality, to have SHC visit the subject site and collect bulk samples of readily available suspect building materials that may be disturbed during possible demolition activities. Sampling was to be collected of building materials with analysis performed by an independent 3rd party laboratory.

Stan Maxam of SHC conducted the site reconnaissance and subsequent sampling on September 20, 2018. Mr. Maxam is an employee of SHC and is an EPA AHERA Accredited Licensed Asbestos Building Inspector, experienced in performing asbestos surveys.

The following summaries apply:

ACM Identified by Testing

3717 E. Seneca Street - (bldg. 1) Drywall surfacing, deco ceiling texture, floor tile, sheet vinyl, built up roofing, roofing sealants and window glazing at <1%.

Note:

Various regulatory agencies have jurisdiction over projects dealing with the assessment PACAM (Presumed Asbestos Containing Materials) and abatement of ACBM's (Asbestos Containing Building Materials). The EPA regulates building materials that contain greater than 1 percent asbestos. Pima County enforces the EPA NESHAP rule with respect to releases of asbestos to the environment. OSHA regulates asbestos removal projects as they relate to worker safety and exposure issues (Airborne asbestos fibers must be below the OSHA standard of 0.10 fibers per cubic centimeter).

** OSHA does not recognize composite sampling protocol (<1%) as related to worker safety and requires proper removal techniques and training.

Category I & II-ACM's (Asbestos Containing Materials) should be removed prior to demolition. Normal demolition/renovation activities involve heavy equipment and crushing of building materials, this could render these ACM's friable and all related building materials. All these materials would then need to be handled and disposed of as Regulated ACM's and possibly causing a violation of the NESAP affecting the Owner & Operator.

A written notification must be provided to the PCD\EQ NESHAP coordinator at least 10 working days prior to asbestos abatement projects involving the removal of greater than 160 square feet of a surfacing material, 260 linear feet of pipe length or one cubic yard of regulated asbestos material.

- Prior to demolition or renovation a copy of the survey should be included with application for permit to Pima County Department of Environmental Quality, County, and City Permit departments.
- A copy should also be made available to the contractor selected to do demolition or renovation and kept on site at all times.
- The owner should retain a licensed and qualified asbestos abatement contractor to perform abatement activities. The general contractor, if one is retained for renovation or demolition, may be the best source for local, licensed abatement contractors.
- Before the abatement of asbestos containing materials from the facility, the abatement contractor or the general contractor should provide the 10 working day notification using forms supplied by PCD\EQ,
EPA Region 9, or the State of Arizona. The notification should include information relating to the abatement work and at the demolition/renovation work.

The owner should ensure that the general contractor and/or abatement contractor provide notice to any people who may be in the area during abatement work (building occupants, other subcontractors, etc.) of the asbestos abatement work.

This document is prepared by SHC and is designated for the sole use of the Owner and/or any regulatory agency that may be directly involved with this property. No other party should rely on the information contained herein without prior written consent of SHC, Inc. This report shall not be reproduced except in full, without the written consent of the Owner.

2.2 Scope of Services

According to the information provided to SHC the buildings on the property may be demolished in the near future. Applicable asbestos regulations require that the buildings or the portions affected by demolition or renovation be thoroughly inspected for asbestos prior to such activities by an AHERA accredited inspector. The purpose and scope of our services was to inspect, identify, and assess suspected asbestos-containing materials that are, or may, at some point become subject to site demolition. SHC was contacted for the purpose of identifying all readily available and assessable suspect asbestos containing building materials prior to the work scheduled at this site.

2.3 Site Information

This is a former residence on the property.

2.4 Survey Methodology

This asbestos compliance survey was accomplished by visually inspecting the subject areas as directed and identifying suspect ACM's within the areas to be disturbed during the possible demolition. A comprehensive visual inspection of the area was performed to acquaint the inspector(s) with an overview of the site. Random samples were taken from interiors and exteriors of the structures. Sampling locations were listed with description given for each sample along with location numbered and sampling location. All interior and exterior areas were visited. Destructive sampling was performed. If questionable items are encountered and revealed, stop work and contact SHC (520-622-3607) for further testing and evaluation.

Random representative samples of homogeneous materials were taken using variations of a random sample pattern. When random sampling could not be conducted, convenient sampling was performed. Samples taken were given individual numbers, prefixed with an area number and recorded on collection sheets and laboratory chain of custody sheets.

The suspect materials identified during our site visit were classified for the type of building material under the following categories:

Surfacing Material:

Material that is sprayed-on, trailed on or otherwise applied to surfaces, such as acoustical plaster on ceilings and fireproofing materials on structural members, or other surface materials used for acoustical, fireproofing or other purposes.
Miscellaneous Material:
Internal building material on structural components, structural members, or fixtures such as floor and ceiling tiles.

2.5 Description of Sampling and Testing
Sampling was performed on all assessable and readily available suspected asbestos-containing materials (ACM) identified as materials that may be disturbed during possible demolition. Sample analysis was performed to determine the presence, if any, of asbestos content in the friable materials. Destructive sampling was performed. Sampling was performed in accordance with all State, Federal and Local governmental agency policies, procedures and regulations. Desert Analytical participates in the AIHA/NIOSH and (PAT) Programs and AIHA Bulk Sample Round Robin Program.

2.6 Sample Summary
During our site inspection of this site at the request of our client, a total of 26 samples were obtained, with 41 individual layers from 13 homogenous areas. Representative samples were collected and submitted for laboratory analysis.

2.7 Analysis of Bulk Samples
Asbestos bulk analysis was performed on all of the samples by EMSL Analytical, Inc. with Polarized Light Microscopy (PLM) is the EPA approved method for analyzing bulk materials for asbestos. PLM utilizes a light microscope equipped with polarizing filters.

The identification of asbestos fiber bundles is determined by visual properties displayed when the sample is treated with various dispersion staining liquids. The actual structure of the fiber and the effect of polarized light on the fiber, all of which is viewed by a trained technician, substantiate identification. The limit of detection of asbestos is about one percent (1%) by area.

Attachments:
- Tables
- Laboratory Data
- Sample Location Descriptions

Table 1 – Description of suspected homogeneous ACBM sampled

<table>
<thead>
<tr>
<th>Area #</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Deco ceiling texture</td>
</tr>
<tr>
<td>2</td>
<td>Drywall / surfacing</td>
</tr>
<tr>
<td>3</td>
<td>Sheet vinyl</td>
</tr>
<tr>
<td>4</td>
<td>Attic insulation</td>
</tr>
<tr>
<td>5</td>
<td>Window glazing</td>
</tr>
<tr>
<td>6</td>
<td>Floor tile and mastic</td>
</tr>
<tr>
<td>7</td>
<td>Felt under wood siding</td>
</tr>
<tr>
<td>8</td>
<td>Duct sealant</td>
</tr>
<tr>
<td>9</td>
<td>Built up roofing</td>
</tr>
</tbody>
</table>
Table 2 – List of Suspect ACM Homogeneous Areas Sampled/Assumed

Samples shaded and bolded are asbestos containing.

<table>
<thead>
<tr>
<th>Sample Number</th>
<th>HA #</th>
<th>Description / Location</th>
<th>Condition</th>
<th>Asbestos</th>
<th>Friable</th>
</tr>
</thead>
<tbody>
<tr>
<td>3717-1</td>
<td>2</td>
<td>Drywall / surfacing</td>
<td>G</td>
<td>Y</td>
<td>N</td>
</tr>
<tr>
<td>3717-2</td>
<td>2</td>
<td>Drywall / surfacing</td>
<td>G</td>
<td>Y</td>
<td>N</td>
</tr>
<tr>
<td>3717-3</td>
<td>2</td>
<td>Drywall / surfacing</td>
<td>G</td>
<td>Y</td>
<td>N</td>
</tr>
<tr>
<td>3717-4</td>
<td>2</td>
<td>Drywall / surfacing</td>
<td>G</td>
<td>Y</td>
<td>N</td>
</tr>
<tr>
<td>3717-5</td>
<td>2</td>
<td>Drywall / surfacing</td>
<td>G</td>
<td>Y</td>
<td>N</td>
</tr>
<tr>
<td>3717-6</td>
<td>1</td>
<td>Deco ceiling texture</td>
<td>G</td>
<td>Y</td>
<td>Y</td>
</tr>
<tr>
<td>3717-7</td>
<td>1</td>
<td>Deco ceiling texture</td>
<td>G</td>
<td>Y</td>
<td>Y</td>
</tr>
<tr>
<td>3717-8</td>
<td>1</td>
<td>Deco ceiling texture</td>
<td>G</td>
<td>Y</td>
<td>Y</td>
</tr>
<tr>
<td>3717-9</td>
<td>6</td>
<td>Floor tile and mastic</td>
<td>G</td>
<td>Y</td>
<td>N</td>
</tr>
<tr>
<td>3717-10</td>
<td>3</td>
<td>Sheet vinyl and mastic</td>
<td>G</td>
<td>Y</td>
<td>Y</td>
</tr>
<tr>
<td>3717-11</td>
<td>3</td>
<td>Sheet vinyl and mastic</td>
<td>G</td>
<td>Y</td>
<td>Y</td>
</tr>
<tr>
<td>3717-12</td>
<td>6</td>
<td>Floor tile and mastic</td>
<td>G</td>
<td>Y</td>
<td>N</td>
</tr>
<tr>
<td>3717-13</td>
<td>4</td>
<td>Attic insulation</td>
<td>G</td>
<td>N</td>
<td>N</td>
</tr>
<tr>
<td>3717-14</td>
<td>5</td>
<td>Window glazing</td>
<td>G</td>
<td>&lt;1%</td>
<td>N</td>
</tr>
<tr>
<td>3717-15</td>
<td>5</td>
<td>Window glazing</td>
<td>G</td>
<td>N</td>
<td>N</td>
</tr>
<tr>
<td>3717-16</td>
<td>7</td>
<td>Felt under wood siding</td>
<td>G</td>
<td>N</td>
<td>N</td>
</tr>
<tr>
<td>3717-17</td>
<td>7</td>
<td>Felt under wood siding</td>
<td>G</td>
<td>N</td>
<td>N</td>
</tr>
<tr>
<td>3717-18</td>
<td>8</td>
<td>Duct sealant</td>
<td>G</td>
<td>N</td>
<td>N</td>
</tr>
<tr>
<td>3716-19</td>
<td>8</td>
<td>Duct sealant</td>
<td>G</td>
<td>N</td>
<td>N</td>
</tr>
<tr>
<td>3717-20</td>
<td>9</td>
<td>Built up roofing</td>
<td>G</td>
<td>Y</td>
<td>N</td>
</tr>
<tr>
<td>3717-21</td>
<td>9</td>
<td>Built up roofing</td>
<td>G</td>
<td>Y</td>
<td>N</td>
</tr>
<tr>
<td>3717-22</td>
<td>10</td>
<td>Roofing sealant</td>
<td>G</td>
<td>Y</td>
<td>N</td>
</tr>
<tr>
<td>3717-23</td>
<td>10</td>
<td>Roofing sealant</td>
<td>G</td>
<td>Y</td>
<td>N</td>
</tr>
<tr>
<td>3717-24</td>
<td>12</td>
<td>Mortar</td>
<td>G</td>
<td>N</td>
<td>N</td>
</tr>
<tr>
<td>3717-25</td>
<td>11</td>
<td>Block</td>
<td>G</td>
<td>N</td>
<td>N</td>
</tr>
<tr>
<td>3717-26</td>
<td>13</td>
<td>Concrete slab</td>
<td>G</td>
<td>N</td>
<td>N</td>
</tr>
</tbody>
</table>
Table 3 - List of Asbestos-Containing Building Materials Greater than 1%

<table>
<thead>
<tr>
<th>Location</th>
<th>Description/Building Material</th>
<th>Sample #</th>
<th>Analytical Results</th>
<th>Category*</th>
<th>Friable Y/N</th>
<th>Estimated Amounts</th>
</tr>
</thead>
<tbody>
<tr>
<td>All rooms except for kitchen</td>
<td>Deco ceiling texture</td>
<td>3717-6, 3717-7, 3717-8</td>
<td>2% Chrysotile</td>
<td>RACM</td>
<td>N</td>
<td>592 SF</td>
</tr>
<tr>
<td>Kitchen, bathroom</td>
<td>Sheet vinyl</td>
<td>3717-10, 3717-11</td>
<td>15-20% Chrysotile</td>
<td>RACM</td>
<td>Y</td>
<td>115 SF</td>
</tr>
<tr>
<td>All rooms except for kitchen and bathroom</td>
<td>Floor tile and mastic</td>
<td>3717-9, 3717-12</td>
<td>5% Chrysotile</td>
<td>Cat I</td>
<td>N</td>
<td>477 SF</td>
</tr>
<tr>
<td>Entire roof</td>
<td>Built up roofing</td>
<td>3717-20, 3717-21</td>
<td>3-15% Chrysotile</td>
<td>Cat I</td>
<td>N</td>
<td>1024 SF</td>
</tr>
<tr>
<td>All roofing penetrations</td>
<td>Roofing sealant</td>
<td>3717-22, 3717-23</td>
<td>5-8% Chrysotile</td>
<td>Cat I</td>
<td>N</td>
<td>10 SF</td>
</tr>
<tr>
<td>All interior walls throughout house</td>
<td>Drywall surfacing</td>
<td>3717-1, 3717-2, 3717-3, 3717-4, 3717-5</td>
<td>2% Chrysotile</td>
<td>Cat II</td>
<td>N</td>
<td>2,100 SF</td>
</tr>
</tbody>
</table>

* Assessment Categories
1. RACM
2. Category I
3. Category II
4. Any Remaining Friable ACBM

Table 4 - List of Less Than 1% Building Materials

<table>
<thead>
<tr>
<th>Location</th>
<th>Description/Building Material</th>
<th>Sample #</th>
<th>Analytical Results</th>
<th>Category*</th>
<th>Friable Y/N</th>
<th>Estimated Amounts</th>
</tr>
</thead>
<tbody>
<tr>
<td>All steel sash windows</td>
<td>Window glazing</td>
<td>3717-15</td>
<td>&lt;1% Chrysotile</td>
<td>Unclassified</td>
<td>N</td>
<td>10 SF</td>
</tr>
</tbody>
</table>

Materials containing less than 1% asbestos are not regulated by NESHAP or AHERA; however, the OSHA personal exposure limits (0.1 F/CC of air as an 8 hour time weighted average or 1.0 f/cc or air over 30 minutes) for asbestos apply when materials containing 1% asbestos or less are disturbed during renovation or demolition.

Under the OSHA Construction Standard for Asbestos (29CFR 1926.1101), materials containing less than or equal to 1% asbestos are still regulated. The entity that disturbs this asbestos material must use wet methods, promptly contain any waste in leak tight containers and conduct air monitoring or have a negative exposure assessment.
Company Name: Southwest Hazard Control  
EMSL Order Number: 041829100

EMSL Customer ID:
City: Tucson  
State/Province: AZ
Telephone #: 520-437-5162  
Fax #: 520-437-5163
Please Provide Results:  
Fax  
Email
Purchase Order:
EMSL Project ID (Internal Use Only):
C T Samples: [] Commercial/Taxable  
[] Residential/Tax Exempt

Third Party Billing requires written authorization from third party
Turnaround Time (TAT) Options* - Please Check
- [ ] 3 Hour
- [ ] 6 Hour
- [ ] 8 Hour
- [ ] 24 Hour
- [ ] 48 Hour
- [ ] 72 Hour
- [ ] 96 Hour
- [ ] 1 Week
- [ ] 2 Week

For TEM Air 3 hr through 6 hr, please call ahead or schedule. There is a premium charge for 3 hour. 1HM ARP/HA or EPA Level I - II. You will be billed by TEMO analyst's fee for this service. Analysis completed in accordance with EMSL's Terms and Conditions located in the Analyst Price Guide.

PCM - Air: [] Check if samples are from NY
- [ ] NIOSH 7400
- [ ] w/o USHA 8 hr, TWA

PLM - Bulk (reporting limit)
- [ ] PLM EPA 600/R-93/116 (>1%)
- [ ] PLM EPA NOB (<1%)

Point Count
- [ ] 100 (<0.25%)
- [ ] 1000 (<0.1%)

Point Count w/Gravimetric
- [ ] 100 (<0.25%)
- [ ] 1000 (<0.1%)

NY S 198.1 (from NY)
- [ ] NYS 198.5 NOB (non-fibrous-NY)
- [ ] NYS 198.8 SOF-V
- [ ] NIOSH 9002 (>1%)

TEM - Air: 4.5 hr TAT (HERA only)
- [ ] AHERA 40 CFR, Part 763
- [ ] NIOSH 7402
- [ ] EPA Level II
- [ ] ISO 10312

TEM - Bulk
- [ ] NYS NOB 198.4 (non-fibrous-NY)
- [ ] Chipfield SOP
- [ ] TEM Mass Analysis - EPA 600 Sec. 2.5
- [ ] TEM Water: EPA 160.2

Fibers >10um  
Waste  
Drinking

Sample Name: Stan Maxam  
Sample Description  
Volume/Area (# Air)

3717-1  
Drywall / surfacing  
By entry  
9-22-18

3717-2  
Drywall / surfacing  
Dining room

3717-3  
Drywall / surfacing  
NW bedroom

3717-4  
Drywall / surfacing  
NE bedroom

3717-5  
Drywall / surfacing  
Kitchen

Total # of Samples: 26

Client Sample # (s):
Relinquished (Client):  
Date:  
Time:  
Received (Lab):
Comments/Special Instructions:
## Asbestos Chain of Custody

**EMSL Order Number** (Lab Use Only):

**041829100**

Additional Pages of the Chain of Custody are only necessary if needed for additional sample information.

<table>
<thead>
<tr>
<th>Sample #</th>
<th>Sample Description</th>
<th>Volume/Area (Air)</th>
<th>Date/Time Sampled</th>
</tr>
</thead>
<tbody>
<tr>
<td>3717-6</td>
<td>Dado ceiling texture</td>
<td>Living room</td>
<td></td>
</tr>
<tr>
<td>3717-7</td>
<td>Dado ceiling texture</td>
<td>Hallway</td>
<td></td>
</tr>
<tr>
<td>3717-8</td>
<td>Dado ceiling texture</td>
<td>NW bedroom</td>
<td></td>
</tr>
<tr>
<td>3717-9</td>
<td>Floor tile and mastic</td>
<td>NE corner</td>
<td></td>
</tr>
<tr>
<td>3717-10</td>
<td>Sheet vinyl and mastic</td>
<td>Kitchen</td>
<td></td>
</tr>
<tr>
<td>3717-11</td>
<td>Sheet vinyl and mastic</td>
<td>Bathroom</td>
<td></td>
</tr>
<tr>
<td>3717-12</td>
<td>Floor tile and mastic</td>
<td>Hallway</td>
<td></td>
</tr>
<tr>
<td>3717-13</td>
<td>Attic insulation</td>
<td>Above hallway</td>
<td></td>
</tr>
<tr>
<td>3717-14</td>
<td>Window glazing</td>
<td>SE corner wood window</td>
<td></td>
</tr>
<tr>
<td>3717-15</td>
<td>Window glazing</td>
<td>South end metal window</td>
<td></td>
</tr>
<tr>
<td>3717-16</td>
<td>Felt under wood siding</td>
<td>SW corner of house</td>
<td></td>
</tr>
<tr>
<td>3717-17</td>
<td>Felt under wood siding</td>
<td>NW corner of house</td>
<td></td>
</tr>
<tr>
<td>3717-18</td>
<td>Duct sealant</td>
<td>Roof ductwork</td>
<td></td>
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<td>3717-19</td>
<td>Duct sealant</td>
<td>Roof ductwork</td>
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</tr>
<tr>
<td>3717-20</td>
<td>Built up roofing</td>
<td>South end of house</td>
<td></td>
</tr>
<tr>
<td>3717-21</td>
<td>Built up roofing</td>
<td>North end of house</td>
<td></td>
</tr>
<tr>
<td>3717-22</td>
<td>Roofing sealant</td>
<td>HVAC penetration</td>
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<tr>
<td>3717-23</td>
<td>Roofing sealant</td>
<td>Plumbing vent</td>
<td></td>
</tr>
<tr>
<td>3717-24</td>
<td>Mortar</td>
<td>By entrance</td>
<td></td>
</tr>
<tr>
<td>3717-25</td>
<td>Block</td>
<td>By entrance</td>
<td></td>
</tr>
<tr>
<td>3717-26</td>
<td>Concrete slab</td>
<td>NW corner of house</td>
<td></td>
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*Comments/Special Instructions:

Page 2 of 2

<table>
<thead>
<tr>
<th>Sample</th>
<th>Description</th>
<th>Appearance</th>
<th>% Fibrous</th>
<th>Non-Asbestos</th>
<th>% Non-Fibrous</th>
<th>Asbestos % Type</th>
</tr>
</thead>
<tbody>
<tr>
<td>3717-1-Drywall</td>
<td>By Entry - Drywall</td>
<td>Brown/White Fibrous Homogeneous</td>
<td>15% Cellulose</td>
<td>85% Non-fibrous (Other)</td>
<td>None Detected</td>
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<tr>
<td>3717-1-Surfacing</td>
<td>By Entry - Surfacing</td>
<td>White Non-Fibrous Homogeneous</td>
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<td>None Detected</td>
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<tr>
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<td>Dining Room - Drywall</td>
<td>Brown/White Fibrous Homogeneous</td>
<td>15% Cellulose</td>
<td>85% Non-fibrous (Other)</td>
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<tr>
<td>3717-2-Surfacing</td>
<td>Dining Room - Surfacing</td>
<td>White Non-Fibrous Homogeneous</td>
<td>98% Non-fibrous (Other)</td>
<td>2% Chrysotile</td>
<td></td>
<td></td>
</tr>
<tr>
<td>3717-3-Drywall</td>
<td>NW Bedroom - Drywall</td>
<td>Brown/White Non-Fibrous Homogeneous</td>
<td>15% Cellulose</td>
<td>85% Non-fibrous (Other)</td>
<td>None Detected</td>
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<tr>
<td>3717-3-Surfacing</td>
<td>NW Bedroom - Surfacing</td>
<td>White Non-Fibrous Homogeneous</td>
<td>98% Non-fibrous (Other)</td>
<td>2% Chrysotile</td>
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<td></td>
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<tr>
<td>3717-4-Drywall</td>
<td>NE Bedroom - Drywall</td>
<td>Brown/White Fibrous Homogeneous</td>
<td>15% Cellulose</td>
<td>85% Non-fibrous (Other)</td>
<td>None Detected</td>
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</tr>
<tr>
<td>3717-4-Surfacing</td>
<td>NE Bedroom - Surfacing</td>
<td>White Non-Fibrous Homogeneous</td>
<td>98% Non-fibrous (Other)</td>
<td>2% Chrysotile</td>
<td></td>
<td></td>
</tr>
<tr>
<td>3717-5-Drywall</td>
<td>Kitchen - Drywall</td>
<td>White Non-Fibrous Homogeneous</td>
<td>None</td>
<td>2% Chrysotile</td>
<td></td>
<td></td>
</tr>
<tr>
<td>3717-5-Surfacing</td>
<td>Kitchen - Surfacing</td>
<td>White Non-Fibrous Homogeneous</td>
<td>98% Non-fibrous (Other)</td>
<td>2% Chrysotile</td>
<td></td>
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<tr>
<td>3717-6</td>
<td>Living Room - Deco Ceiling Texture</td>
<td>White Non-Fibrous Homogeneous</td>
<td>97% Non-fibrous (Other)</td>
<td>3% Chrysotile</td>
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<tr>
<td>3717-7</td>
<td>Hallway - Deco Ceiling Texture</td>
<td>White Non-Fibrous Homogeneous</td>
<td>97% Non-fibrous (Other)</td>
<td>3% Chrysotile</td>
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<tr>
<td>3717-8</td>
<td>NW Bedroom - Deco Ceiling Texture</td>
<td>White Fibrous Homogeneous</td>
<td>96% Non-fibrous (Other)</td>
<td>4% Chrysotile</td>
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<tr>
<td>3717-9-Floor Tile</td>
<td>NE Corner - Floor Tile</td>
<td>Brown Non-Fibrous Homogeneous</td>
<td>95% Non-fibrous (Other)</td>
<td>5% Chrysotile</td>
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<td>3717-9-Mastic</td>
<td>NE Corner - Mastic</td>
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<td>3717-9-Mastic 2</td>
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</tbody>
</table>

Initial report from: 09/29/2018 10:04:33
# Test Report: Asbestos Analysis of Bulk Materials via EPA 600/R-93/116 Method using Polarized Light Microscopy

<table>
<thead>
<tr>
<th>Sample</th>
<th>Description</th>
<th>Appearance</th>
<th>Non-Asbestos</th>
<th>% Fibrous</th>
<th>% Non-Fibrous (Other)</th>
<th>Asbestos % Type</th>
</tr>
</thead>
<tbody>
<tr>
<td>3717-10</td>
<td>Sheet Vinyl</td>
<td>Tan Fibrous</td>
<td>15% Cellulose</td>
<td>65%</td>
<td>Non-Fibrous (Other)</td>
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<tr>
<td>3717-11</td>
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<td>Brown Non-Fibrous</td>
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<tr>
<td>3717-12</td>
<td>Floor Tile</td>
<td>Brown Non-Fibrous</td>
<td>95% Non-Fibrous</td>
<td></td>
<td></td>
<td>4% Chrysotile</td>
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<tr>
<td>3717-13</td>
<td>Above Hallway - Attic Insulation</td>
<td>Yellow Fibrous</td>
<td>90% Min. Wool</td>
<td>10%</td>
<td>Non-Fibrous (Other)</td>
<td>None Detected</td>
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<tr>
<td>3717-14</td>
<td>SE Corner Wood Window - Window Glazing</td>
<td>White Non-Fibrous</td>
<td>100% Non-Fibrous</td>
<td></td>
<td></td>
<td>None Detected</td>
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<tr>
<td>3717-15</td>
<td>South End Metal Window - Window Glazing</td>
<td>Tan Non-Fibrous</td>
<td>100% Non-Fibrous</td>
<td></td>
<td></td>
<td>&lt;1% Chrysotile</td>
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<tr>
<td>3717-16</td>
<td>SW Corner of House - Felt under Wood Siding</td>
<td>Black Fibrous</td>
<td>60% Cellulose</td>
<td>40%</td>
<td>Non-Fibrous (Other)</td>
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<tr>
<td>3717-17</td>
<td>NW Corner of House - Felt under Wood Siding</td>
<td>Black Fibrous</td>
<td>60% Cellulose</td>
<td>40%</td>
<td>Non-Fibrous (Other)</td>
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<tr>
<td>3717-18</td>
<td>Roof Duct Work - Duct Sealant</td>
<td>White Non-Fibrous</td>
<td>100% Non-Fibrous</td>
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<td></td>
<td>None Detected</td>
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<tr>
<td>3717-19</td>
<td>Roof Duct Work - Duct Sealant</td>
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<td>100% Non-Fibrous</td>
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<td></td>
<td>None Detected</td>
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<tr>
<td>3717-20</td>
<td>Silver Paint</td>
<td>Silver Non-Fibrous</td>
<td>97% Non-Fibrous</td>
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<td>3% Chrysotile</td>
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<tr>
<td>3717-21</td>
<td>South End of House - Built up Roofing</td>
<td>Black Fibrous</td>
<td>20% Cellulose</td>
<td>65%</td>
<td>Non-Fibrous (Other)</td>
<td>15% Chrysotile</td>
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<tr>
<td>3717-22</td>
<td>South End of House - Built up Roofing</td>
<td>Black Fibrous</td>
<td>60% Cellulose</td>
<td>40%</td>
<td>Non-Fibrous (Other)</td>
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<tr>
<td>3717-23</td>
<td>South End of House - Built up Roofing</td>
<td>Black Fibrous</td>
<td>100% Non-Fibrous</td>
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<td>None Detected</td>
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<tr>
<td>3717-24</td>
<td>North End of House - Built up Roofing</td>
<td>White/Black Fibrous</td>
<td>20% Glass</td>
<td>80%</td>
<td>Non-Fibrous (Other)</td>
<td>None Detected</td>
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</tbody>
</table>
## Test Report: Asbestos Analysis of Bulk Materials via EPA 600/R-93/116 Method using Polarized Light Microscopy

<table>
<thead>
<tr>
<th>Sample</th>
<th>Description</th>
<th>Appearance</th>
<th>% Fibrous</th>
<th>% Non-Fibrous</th>
<th>Asbestos Type</th>
</tr>
</thead>
<tbody>
<tr>
<td>3717-21-Built Up Roofing</td>
<td>North End of House - Built up Roofing</td>
<td>Black Fibrous Homogeneous</td>
<td>15% Cellulose</td>
<td>65% Non-fibrous (Other)</td>
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<tr>
<td>041829100-0021A</td>
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<tr>
<td>3717-21-Tar Paper</td>
<td>North End of House - Built up Roofing</td>
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<td>041829100-0027B</td>
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<tr>
<td>3717-21-Tar</td>
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<tr>
<td>3717-22</td>
<td>HVAC Penetration - Roofing Sealant</td>
<td>White/Black Non-Fibrous Homogeneous</td>
<td>95% Non-fibrous (Other)</td>
<td>5% Chrysotile</td>
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<tr>
<td>041829100-0027D</td>
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<td>3717-23</td>
<td>Plumbing Vent - Roofing Sealant</td>
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<td>92% Non-fibrous (Other)</td>
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<td>041829100-0023D</td>
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<td>3717-24</td>
<td>By Entrance - Morter</td>
<td>Gray Non-Fibrous Homogeneous</td>
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<td>3717-25</td>
<td>By Entrance - Block</td>
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<tr>
<td>041829100-0025</td>
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<td>NW Corner of House - Concrete Slab</td>
<td>Gray Non-Fibrous Homogeneous</td>
<td>100% Non-fibrous (Other)</td>
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<tr>
<td>041829100-0026</td>
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<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**Analyst(s):**
- Amy Johnson (7)
- Keisha Vazquez Caraballo (29)
- Olufunke Akimbode (5)

Initial report from: 09/29/2018 10:04:33

EMSL maintains liability limited to the cost of analysis. The above analyses were performed in general compliance with Appendix E to Subpart E of 40 CFR (previously EPA 600/R-93/116 "Interim Method"), but augmented with procedures outlined in the 1993 ("Final") version of the method. This report relates only to the samples reported above, and may not be reproduced, except in full, without written approval by EMSL. EMSL bears no responsibility for sample collection activities or analytical method limitations. Interpretation and use of test results are the responsibility of the client. All samples received in acceptable condition unless otherwise noted. This report must not be used by the client to claim product certification, approval, or endorsement by NVLAP. NVLAP or any agency of the federal government. EMSL recommends gravimetric reduction for all non-fibrous organically bound materials prior to analysis. Estimation of uncertainty is available on request.

**Samples analyzed by EMSL Analytical, Inc., Cinnaminson, NJ NVLAP Lab Code 100148-0, AIHA-LAP, LLC-HLAP Lab 100194, NYS ELAP 16872, NJ DEP 03038, PA ID# 68-59367**
Stanley P. Maxam

ETC Compliance Solutions is accredited by the State of Texas License No. 00-0076

Asbestos Building Inspector – Refresher

Certificate of Achievement
Asbestos Containing Building Material Survey

Former Dickey & Sons Property Residence at 3710 E. Hampton Street (Bldg. #2) Tucson, AZ

Report Date: October 5, 2018

SHC-T18651
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2.5 Description of Sampling and Testing  
2.6 Sample Summary  
2.7 Analysis of Bulk Samples  
2.8 Conclusion

Section 3.0  
Tables and Maps  
Sample Summary

Section 4.0  
Asbestos Bulk Laboratory Report  
Chain of Custodies

Section 5.0  
Certification  
Inspectors Certification
INSPECTION INFORMATION SHEET

Inspection Firm: Southwest Hazard Control, Inc.
1953 West Grant Road
Tucson, Arizona 85745

Current Owner(s): Pima County Department of Environmental Quality
33 N. Stone Avenue #700
Tucson, AZ 85701

Site Address: 3710 E. Hampton Street (bldg. #2)

Date of Inspection: September 24, 2018

Laboratory: EMSL Analytical, Inc.
200 Route 130 North Cinnaminson
NJ 08077
Total Samples: 14
Analysis Date: September 27, 2018

Name of Inspector: Stanley P. Maxam
AHERA Certificate No: 08820342
Training Provider: ETC Compliance Solutions
Date of Expiration: December 19, 2018
2.0 INSPECTION REPORT

2.1 Introduction

Southwest Hazard Control, Inc. ("hereafter known as SHC") was contacted by Kimberly Baeza of the Pima County Department of Environmental Quality, to have SHC visit the subject site and collect bulk samples of readily available suspect building materials that may be disturbed during possible demolition activities. Sampling was to be collected of building materials with analysis performed by an independent 3rd party laboratory.

Stan Maxam of SHC conducted the site reconnaissance and subsequent sampling on September 24, 2018. Mr. Maxam is an employee of SHC and is an EPA AHERA Accredited Licensed Asbestos Building Inspector, experienced in performing asbestos surveys.

The following summaries apply:

ACM Identified by Testing

3710 E. Hampton Street - (bldg. 2) Drywall surfacing, deco ceiling texture and roofing sealants.

Note:

Various regulatory agencies have jurisdiction over projects dealing with the assessment PACAM (Presumed Asbestos Containing Materials) and abatement of ACBM's (Asbestos Containing Building Materials). The EPA regulates building materials that contain greater than 1 percent asbestos. Pima County enforces the EPA NESHAP rule with respect to releases of asbestos to the environment. OSHA regulates asbestos removal projects as they relate to worker safety and exposure issues. **Airborne asbestos fibers must be below the OSHA standard of 0.10 fibers per cubic centimeter.**

**OSHA does not recognize composite sampling protocol (<1%) as related to worker safety and requires proper removal techniques and training.**

Category I & II-ACM's (Asbestos Containing Materials) should be removed prior to demolition. Normal demolition/renovation activities involve heavy equipment and crushing of building materials, this could render these ACM's friable and all related building materials. All these materials would then need to be handled and disposed of as Regulated ACM's and possibly causing a violation of the NESHAP affecting the Owner & Operator.

A written notification must be provided to the PCDEQ NESHAP coordinator at least 10 working days prior to asbestos abatement projects involving the removal of greater than 160 square feet of a surfacing material, 260 linear feet of pipe length or one cubic yard of regulated asbestos material.

- Prior to demolition or renovation a copy of the survey should be included with application for permit to Pima County Department of Environmental Quality, County, and City Permit departments.
- A copy should also be made available to the contractor selected to do demolition or renovation and kept on site at all times.
- The owner should retain a licensed and qualified asbestos abatement contractor to perform abatement activities. The general contractor, if one is retained for renovation or demolition, may be the best source for local, licensed abatement contractors.
- Before the abatement of asbestos containing materials from the facility, the abatement contractor or the general contractor should provide the 10 working day notification using forms supplied by PCDEQ,
EPA Region 9, or the State of Arizona. The notification should include information relating to the
abatement work and at the demolition/renovation work.

The owner should ensure that the general contractor and/or abatement contractor provide notice to any
people who may be in the area during abatement work (building occupants, other subcontractors, etc.) of the
asbestos abatement work.

This document is prepared by SHC and is designated for the sole use of the Owner
and/or any regulatory agency that may be directly involved with this property. No
other party should rely on the information contained herein without prior written
consent of SHC, Inc. This report shall not be reproduced except in full, without the
written consent of the Owner.

2.2 Scope of Services

According to the information provided to SHC the buildings on the property may be
demolished in the near future. Applicable asbestos regulations require that the
buildings or the portions affected by demolition or renovation be thoroughly inspected
for asbestos prior to such activities by an AHERA accredited inspector. The purpose and
scope of our services was to inspect, identify, and assess suspected asbestos-containing
materials that are, or may, at some point become subject to site demolition. SHC was
contacted for the purpose of identifying all readily available and assessable suspect
asbestos containing building materials prior to the work scheduled at this site.

2.3 Site Information

This is a former residence on the property.

2.4 Survey Methodology

This asbestos compliance survey was accomplished by visually inspecting the subject
areas as directed and identifying suspect ACM’s within the areas to be disturbed during
the possible demolition. A comprehensive visual inspection of the area was performed
to acquaint the inspector(s) with an overview of the site. Random samples were taken
from interiors and exteriors of the structures. Sampling locations were listed with
description given for each sample along with location numbered and sampling location.
All interior and exterior areas were visited. Destructive sampling was performed. If
questionable items are encountered and revealed, stop work and contact SHC (520-
622-3607) for further testing and evaluation.

Random representative samples of homogeneous materials were taken using variations
of a random sample pattern. When random sampling could not be conducted,
convenient sampling was performed. Samples taken were given individual numbers,
prefix with an area number and recorded on collection sheets and laboratory chain
of custody sheets.

The suspect materials identified during our site visit were classified for the type of
building material under the following categories:

Surfacing Material:

Material that is sprayed-on, troweled on or otherwise applied to surfaces, such as
acoustical plaster on ceilings and fireproofing materials on structural members, or
other surface materials used for acoustical, fireproofing or other purposes.
**Miscellaneous Material:**

Internal building material on structural components, structural members, or fixtures such as floor and ceiling tiles.

2.5 **Description of Sampling and Testing**

Sampling was performed on all assessable and readily available suspected asbestos-containing materials (ACM) identified as materials that may be disturbed during possible demolition. Sample analysis was performed to determine the presence, if any, of asbestos content in the friable materials. Destructive sampling was performed. Sampling was performed in accordance with all State, Federal and Local governmental agency policies, procedures and regulations. Desert Analytical participates in the AIHA/NIOSH and (PAT) Programs and AIHA Bulk Sample Round Robin Program.

2.6 **Sample Summary**

During our site inspection of this site at the request of our client, a total of 14 samples were obtained, with 41 individual layers from 13 homogeneous areas. Representative samples were collected and submitted for laboratory analysis.

2.7 **Analysis of Bulk Samples**

Asbestos bulk analysis was performed on all of the samples by EMSL Analytical, Inc. with Polarized Light Microscopy (PLM) is the EPA approved method for analyzing bulk materials for asbestos. PLM utilizes a light microscope equipped with polarizing filters.

The identification of asbestos fiber bundles is determined by visual properties displayed when the sample is treated with various dispersion staining liquids. The actual structure of the fiber and the effect of polarized light on the fiber, all of which is viewed by a trained technician, substantiate identification. The limit of detection of asbestos is about one percent (1%) by area.

**Attachments:**  
Tables  
Laboratory Data  
Sample Location Descriptions

---

**Table 1 – Description of suspected homogeneous ACM sampled**

<table>
<thead>
<tr>
<th>Area #</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Deco ceiling texture</td>
</tr>
<tr>
<td>2</td>
<td>Drywall / surfacing</td>
</tr>
<tr>
<td>3</td>
<td>Cove base mastic</td>
</tr>
<tr>
<td>4</td>
<td>Carpet mastic</td>
</tr>
<tr>
<td>5</td>
<td>Ceramic tile, thin set &amp; grout</td>
</tr>
<tr>
<td>6</td>
<td>Roofing sealant</td>
</tr>
</tbody>
</table>
### Table 2 - List of Suspect ACM Homogeneous Areas Sampled/Assumed

Samples shaded and bolded are asbestos containing.

<table>
<thead>
<tr>
<th>Sample Number</th>
<th>HA #</th>
<th>Description / Location</th>
<th>Condition</th>
<th>Asbestos</th>
<th>Friable</th>
</tr>
</thead>
<tbody>
<tr>
<td>3710-1</td>
<td>2</td>
<td>Drywall / surfacing</td>
<td>Bathroom</td>
<td>G</td>
<td>Y</td>
</tr>
<tr>
<td>3710-2</td>
<td>2</td>
<td>Drywall / surfacing</td>
<td>Middle room</td>
<td>G</td>
<td>Y</td>
</tr>
<tr>
<td>3710-3</td>
<td>2</td>
<td>Drywall / surfacing</td>
<td>North room</td>
<td>G</td>
<td>Y</td>
</tr>
<tr>
<td>3710-4</td>
<td>2</td>
<td>Drywall / surfacing</td>
<td>Front room</td>
<td>G</td>
<td>Y</td>
</tr>
<tr>
<td>3710-5</td>
<td>2</td>
<td>Drywall / surfacing</td>
<td>Front room</td>
<td>G</td>
<td>Y</td>
</tr>
<tr>
<td>3710-6</td>
<td>1</td>
<td>Deco ceiling texture</td>
<td>Front room</td>
<td>G</td>
<td>Y</td>
</tr>
<tr>
<td>3710-7</td>
<td>1</td>
<td>Deco ceiling texture</td>
<td>Hallway</td>
<td>G</td>
<td>Y</td>
</tr>
<tr>
<td>3710-8</td>
<td>1</td>
<td>Deco ceiling texture</td>
<td>NW bedroom</td>
<td>G</td>
<td>Y</td>
</tr>
<tr>
<td>3710-9</td>
<td>3</td>
<td>Cove base mastic</td>
<td>North room</td>
<td>G</td>
<td>N</td>
</tr>
<tr>
<td>3710-10</td>
<td>3</td>
<td>Cove base mastic</td>
<td>Middle room</td>
<td>G</td>
<td>N</td>
</tr>
<tr>
<td>3710-11</td>
<td>4</td>
<td>Carpet mastic</td>
<td>Front room</td>
<td>G</td>
<td>N</td>
</tr>
<tr>
<td>3710-12</td>
<td>5</td>
<td>Ceramic tile, thin set &amp; grout</td>
<td>Bathroom</td>
<td>G</td>
<td>N</td>
</tr>
<tr>
<td>3710-13</td>
<td>6</td>
<td>Roofing sealant</td>
<td>South bathroom vent</td>
<td>G</td>
<td>Y</td>
</tr>
<tr>
<td>3710-14</td>
<td>6</td>
<td>Roofing sealant</td>
<td>North end</td>
<td>G</td>
<td>Y</td>
</tr>
</tbody>
</table>

### Table 3 - List of Asbestos-Containing Building Materials Greater than 1%

<table>
<thead>
<tr>
<th>Location</th>
<th>Description/Building Material</th>
<th>Sample #</th>
<th>Analytical Results</th>
<th>Category*</th>
<th>Friable Y/N</th>
<th>Estimated Amounts</th>
</tr>
</thead>
<tbody>
<tr>
<td>All rooms throughout</td>
<td>Drywall surfacing</td>
<td>3710-1, 3710-4</td>
<td>2% Chrysotile</td>
<td>Cat II</td>
<td>N</td>
<td>1,288 SF</td>
</tr>
<tr>
<td></td>
<td></td>
<td>3710-5</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Front, middle &amp; north</td>
<td>Deco ceiling texture</td>
<td>3710-10, 3710-11</td>
<td>2-5% Chrysotile</td>
<td>RACM</td>
<td>Y</td>
<td>675 SF</td>
</tr>
<tr>
<td>rooms</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>All roofing penetrations</td>
<td>Roofing sealant</td>
<td>3710-13, 3710-14</td>
<td>8-10% Chrysotile</td>
<td>Cat I</td>
<td>N</td>
<td>40 SF</td>
</tr>
</tbody>
</table>

* Assessment Categories
1. RACM
2. Category I
3. Category II
4. Any Remaining Friable ACM
Company Name: Southwest Hazard Control

<table>
<thead>
<tr>
<th>Sample #</th>
<th>Sample Description</th>
<th>Voluntary Area (Air) HA # (Bulk)</th>
<th>Date/Time Sampled</th>
</tr>
</thead>
<tbody>
<tr>
<td>3710-1</td>
<td>Drywall / surfacing</td>
<td>Restroom</td>
<td>9/25/18</td>
</tr>
<tr>
<td>3710-2</td>
<td>Drywall / surfacing</td>
<td>Middle room</td>
<td></td>
</tr>
<tr>
<td>3710-3</td>
<td>Drywall / surfacing</td>
<td>North room</td>
<td></td>
</tr>
<tr>
<td>3710-4</td>
<td>Drywall / surfacing</td>
<td>Front room</td>
<td></td>
</tr>
<tr>
<td>3710-5</td>
<td>Drywall / surfacing</td>
<td>Front room</td>
<td></td>
</tr>
</tbody>
</table>

Client Sample #: Total # of Samples: 14
# Asbestos Chain of Custody

**EMSL Order Number (Lab Use Only):** 041 & 2509

*Additional Pages of the Chain of Custody are only necessary if needed for additional sample information*

<table>
<thead>
<tr>
<th>Sample #</th>
<th>Sample Description</th>
<th>Volume/Area (Air)</th>
<th>Date/Time Sampled</th>
</tr>
</thead>
<tbody>
<tr>
<td>3710-6</td>
<td>Deco ceiling texture</td>
<td></td>
<td>9/25/18</td>
</tr>
<tr>
<td>3710-7</td>
<td>Deco ceiling texture</td>
<td></td>
<td></td>
</tr>
<tr>
<td>3710-8</td>
<td>Deco ceiling texture</td>
<td></td>
<td></td>
</tr>
<tr>
<td>3710-9</td>
<td>Cove base mastic</td>
<td></td>
<td></td>
</tr>
<tr>
<td>3710-10</td>
<td>Cove base mastic</td>
<td></td>
<td></td>
</tr>
<tr>
<td>3710-11</td>
<td>Carpet mastic</td>
<td></td>
<td></td>
</tr>
<tr>
<td>3710-12</td>
<td>Ceramic tile, thin set, grout</td>
<td></td>
<td></td>
</tr>
<tr>
<td>3710-13</td>
<td>Roofing sealant</td>
<td></td>
<td></td>
</tr>
<tr>
<td>3710-14</td>
<td>Roofing sealant</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

*Comments/Special Instructions:*

Page 2 of 2 pages
# Test Report: Asbestos Analysis of Bulk Materials via EPA 600/R-93/116 Method using Polarized Light Microscopy

<table>
<thead>
<tr>
<th>Sample</th>
<th>Description</th>
<th>Appearance</th>
<th>Non-Asbestos</th>
<th>Asbestos</th>
</tr>
</thead>
<tbody>
<tr>
<td>3710-1</td>
<td>Drywall</td>
<td>Brown/White Fibrous Homogeneous</td>
<td>15% Cellulose 2% Glass</td>
<td>83% Non-fibrous (Other)</td>
</tr>
<tr>
<td>3710-1</td>
<td>Surfacing</td>
<td>White Non-Fibrous Homogeneous</td>
<td>98% Non-fibrous (Other)</td>
<td>2% Chrysotile</td>
</tr>
<tr>
<td>3710-2</td>
<td>Drywall</td>
<td>Brown/White Fibrous Homogeneous</td>
<td>15% Cellulose</td>
<td>85% Non-fibrous (Other)</td>
</tr>
<tr>
<td>3710-2</td>
<td>Surfacing</td>
<td>White Non-Fibrous Homogeneous</td>
<td>100% Non-fibrous (Other)</td>
<td>None Detected</td>
</tr>
<tr>
<td>3710-3</td>
<td>Surfacing</td>
<td>White Non-Fibrous Homogeneous</td>
<td>100% Non-fibrous (Other)</td>
<td>None Detected</td>
</tr>
<tr>
<td>3710-4</td>
<td>Drywall</td>
<td>Brown/White Fibrous Homogeneous</td>
<td>15% Cellulose</td>
<td>85% Non-fibrous (Other)</td>
</tr>
<tr>
<td>3710-4</td>
<td>Surfacing</td>
<td>White Non-Fibrous Homogeneous</td>
<td>98% Non-fibrous (Other)</td>
<td>2% Chrysotile</td>
</tr>
<tr>
<td>3710-5</td>
<td>Drywall</td>
<td>Brown/White Fibrous Homogeneous</td>
<td>15% Cellulose</td>
<td>85% Non-fibrous (Other)</td>
</tr>
<tr>
<td>3710-5</td>
<td>Surfacing</td>
<td>White Non-Fibrous Homogeneous</td>
<td>98% Non-fibrous (Other)</td>
<td>2% Chrysotile</td>
</tr>
<tr>
<td>3710-6</td>
<td>Deco Ceiling Texture</td>
<td>White Non-Fibrous Homogeneous</td>
<td>95% Non-fibrous (Other)</td>
<td>5% Chrysotile</td>
</tr>
<tr>
<td>3710-7</td>
<td>Deco Ceiling Texture</td>
<td>White Non-Fibrous Homogeneous</td>
<td>98% Non-fibrous (Other)</td>
<td>2% Chrysotile</td>
</tr>
<tr>
<td>3710-8</td>
<td>Deco Ceiling Texture</td>
<td>White Non-Fibrous Homogeneous</td>
<td>98% Non-fibrous (Other)</td>
<td>2% Chrysotile</td>
</tr>
<tr>
<td>3710-9</td>
<td>Cove Base Mastic</td>
<td>White Non-Fibrous Homogeneous</td>
<td>100% Non-fibrous (Other)</td>
<td>None Detected</td>
</tr>
<tr>
<td>3710-10</td>
<td>Cove Base Mastic</td>
<td>White Non-Fibrous Homogeneous</td>
<td>100% Non-fibrous (Other)</td>
<td>None Detected</td>
</tr>
<tr>
<td>3710-11</td>
<td>Carpet Mastic</td>
<td>Yellow Non-Fibrous Homogeneous</td>
<td>100% Non-fibrous (Other)</td>
<td>None Detected</td>
</tr>
<tr>
<td>3710-12</td>
<td>Ceramic Tile</td>
<td>Red Non-Fibrous Homogeneous</td>
<td>100% Non-fibrous (Other)</td>
<td>None Detected</td>
</tr>
</tbody>
</table>


ASB_FLM_0008_0001 - 1.78 Printed: 09/27/2018 4:42 PM
## Test Report: Asbestos Analysis of Bulk Materials via EPA 600/R-93/116 Method using Polarized Light Microscopy

<table>
<thead>
<tr>
<th>Sample</th>
<th>Description</th>
<th>Appearance</th>
<th>Non-Asbestos</th>
<th>Asbestos</th>
</tr>
</thead>
<tbody>
<tr>
<td>3710-12-Thinset</td>
<td>Restroom - Thinset</td>
<td>Gray</td>
<td>100% Non-fibrous (Other)</td>
<td>None Detected</td>
</tr>
<tr>
<td>01162010-0011A</td>
<td></td>
<td>Non-Fibrous</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>Homogeneous</td>
<td></td>
<td></td>
</tr>
<tr>
<td>3710-12-Graut</td>
<td>Restroom - Graut</td>
<td>Gray</td>
<td>100% Non-fibrous (Other)</td>
<td>None Detected</td>
</tr>
<tr>
<td>01162010-0011A</td>
<td></td>
<td>Non-Fibrous</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>Homogeneous</td>
<td></td>
<td></td>
</tr>
<tr>
<td>3710-13</td>
<td>Vent Penetration - Roofing Sealant</td>
<td>Black</td>
<td>92% Non-fibrous (Other)</td>
<td>8% Chrysotile</td>
</tr>
<tr>
<td>01162010-0012</td>
<td></td>
<td>Fibrous</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>Homogeneous</td>
<td></td>
<td></td>
</tr>
<tr>
<td>3710-14</td>
<td>North End of Roof - Roofing Sealant</td>
<td>Black</td>
<td>90% Non-fibrous (Other)</td>
<td>10% Chrysotile</td>
</tr>
<tr>
<td>01162010-0014</td>
<td></td>
<td>Fibrous</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>Homogeneous</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**Analysis(s)**

Adam Cart (16)

Sel Smith (4)

---

EMSL maintains liability limited to cost of analysis. The above analyses were performed in general compliance with Appendix E to Subpart E of 40 CFR (previously EPA 600/R-88-002 "Interim Method") but augmented with procedures outlined in the 1992 (Final) version of the method. This report relates only to the samples reported above, and may not be reproduced, except in full, without written approval by EMSL. EMSL bears no responsibility for sample collection activities or analytical method limitations. Interpretation and use of test results are the responsibility of the client. All samples received in acceptable condition unless otherwise noted. This report must not be used by the client to elicit product certification, approval, or endorsement by NVLAP, NIST or any agency of the federal government. EMSL recommends gravimetric indication for all non-fibrous, organically bound materials prior to analysis. Extensions of uncertainty are available on request.

Samples analyzed by EMSL Analytical, Inc. Cinnaminson, NJ NVLAP Lab Code 100119-3, AHA-LAP, LLC NVLAP Lab 100119, NYS ELAP 10872, NJ DEP 02036, PA ID# 003257

---


**Page 2 of 2**
Training Director: Carole Benz
Instructor: Brian Gladhart

Issue / Exam Date: December 19, 2017
Certificate #: 08820342
Expiration Date: December 19, 2018
Training Date: December 19, 2017

Stanley R. Maxam

This is to certify that the following individual has passed a competency exam meeting the requisite training for asbestos awareness and abatement under TSCA Title II. ETC Compliance Solutions is accredited by the State of Texas License No. 00-0076.

Asbestos Building Inspector - Refresher Certificate of Achievement
Asbestos Containing Building Material Survey

Former Dickey & Sons Property Residence at 3701 E. Seneca Street (Bldg. #3) Tucson, AZ

Report Date: October 5, 2018

SHC-T18651
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Site Map

Section 2.0  
Main Inspection Report  
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2.2 Scope of Services  
2.3 Site Information  
2.4 Survey of Methodology  
2.5 Description of Sampling and Testing  
2.6 Sample Summary  
2.7 Analysis of Bulk Samples  
2.8 Conclusion

Section 3.0  
Tables and Maps  
Sample Summary

Section 4.0  
Asbestos Bulk Laboratory Report  
Chain of Custodies

Section 5.0  
Certification  
Inspectors Certification
INSPECTION INFORMATION SHEET

Inspection Firm: Southwest Hazard Control, Inc.
1953 West Grant Road
Tucson, Arizona 85745

Current Owner(s): Pima County Department of Environmental Quality
33 N. Stone Avenue #700
Tucson, AZ 85701

Site Address: 3701 E. Seneca Street Street (bldg. #3)

Date of Inspection: September 25, 2018

Laboratory: EMSL Analytical, Inc.
200 Route 130 North Cinnaminson
NJ 08077
Total Samples: 9
Analysis Date: September 27, 2018

Name of Inspector: Stanley P. Maxam
AHERA Certificate No: 08820342
Training Provider: ETC Compliance Solutions
Date of Expiration: December 19, 2018
2.0 INSPECTION REPORT

2.1 Introduction

Southwest Hazard Control, Inc. ("hereafter known as SHC") was contacted by Kimberly Baeza of the Pima County Department of Environmental Quality, to have SHC visit the subject site and collect bulk samples of readily available suspect building materials that may be disturbed during possible demolition activities. Sampling was to be collected of building materials with analysis performed by an independent 3rd party laboratory.

Stan Maxam of SHC conducted the site reconnaissance and subsequent sampling on September 25, 2018. Mr. Maxam is an employee of SHC and is an EPA AHERA Accredited Licensed Asbestos Building Inspector, experienced in performing asbestos surveys.

The following summaries apply:

ACM Identified by Testing

3701 E. Seneca Street - (bldg. 3) Roof flashing sealant over north attached shed and window glazing.

Note:

Various regulatory agencies have jurisdiction over projects dealing with the assessment PACAM (Presumed Asbestos Containing Materials) and abatement of ACBM's (Asbestos Containing Building Materials). The EPA regulates building materials that contain greater than 1 percent asbestos. Pima County enforces the EPA NESHAP rule with respect to release of asbestos to the environment. OSHA regulates asbestos removal projects as they relate to worker safety and exposure issues. (Airborne asbestos fibers must be below the OSHA standard of 0.10 fibers per cubic centimeter.

** OSHA does not recognize composite sampling protocol (<1%) as related to worker safety and requires proper removal techniques and training.

Category 1 & 2-ACM's (Asbestos Containing Materials) should be removed prior to demolition. Normal demolition/renovation activities involve heavy equipment and crushing of building materials, this could render these ACM's friable and all related building materials. All these materials would then need to be handled and disposed of as Regulated ACM's and possibly causing a violation of the NESAP affecting the Owner & Operator.

A written notification must be provided to the PCDEQ NESHAP coordinator at least 10 working days prior to asbestos abatement projects involving the removal of greater than 160 square feet of a surfacing material, 260 linear feet of pipe length or one cubic yard of regulated asbestos material.

- Prior to demolition or renovation a copy of the survey should be included with application for permit to Pima County Department of Environmental Quality, County, and City Permit departments.
- A copy should also be made available to the contractor selected to do demolition or renovation and kept on site at all times.
- The owner should retain a licensed and qualified asbestos abatement contractor to perform abatement activities. The general contractor, if one is retained for renovation or demolition, may be the best source for local, licensed abatement contractors.
- Before the abatement of asbestos containing materials from the facility, the abatement contractor or the general contractor should provide the 10 working day notification using forms supplied by PCDEQ,
EPA Region 9, or the State of Arizona. The notification should include information relating to the abatement work and at the demolition/renovation work.

The owner should ensure that the general contractor and/or abatement contractor provide notice to any people who may be in the area during abatement work (building occupants, other subcontractors, etc.) of the asbestos abatement work.

This document is prepared by SHC and is designated for the sole use of the Owner and/or any regulatory agency that may be directly involved with this property. No other party should rely on the information contained herein without prior written consent of SHC, Inc. This report shall not be reproduced except in full, without the written consent of the Owner.

2.2 Scope of Services

According to the information provided to SHC the buildings on the property may be demolished in the near future. Applicable asbestos regulations require that the buildings or the portions affected by demolition or renovation be thoroughly inspected for asbestos prior to such activities by an AIREA accredited inspector. The purpose and scope of our services was to inspect, identify, and assess suspected asbestos-containing materials that are, or may, at some point become subject to site demolition. SHC was contacted for the purpose of identifying all readily available and assessable suspect asbestos containing building materials prior to the work scheduled at this site.

2.3 Site Information

This is a former metal garage and attached wood shed on the property.

2.4 Survey Methodology

This asbestos compliance survey was accomplished by visually inspecting the subject areas as directed and identifying suspect ACM’s within the areas to be disturbed during the possible demolition. A comprehensive visual inspection of the area was performed to acquaint the inspector(s) with an overview of the site. Random samples were taken from interiors and exteriors of the structures. Sampling locations were listed with description given for each sample along with location numbered and sampling location. All interior and exterior areas were visited. Destructive sampling was performed. If questionable items are encountered and revealed, stop work and contact SHC (520-622-3607) for further testing and evaluation.

Random representative samples of homogeneous materials were taken using variations of a random sample pattern. When random sampling could not be conducted, convenient sampling was performed. Samples taken were given individual numbers, prefixed with an area number and recorded on collection sheets and laboratory chain of custody sheets.

The suspect materials identified during our site visit were classified for the type of building material under the following categories:

**Surfacing Material:**

Material that is sprayed-on, trowled on or otherwise applied to surfaces, such as acoustical plaster on ceilings and fireproofing materials on structural members, or other surface materials used for acoustical, fireproofing or other purposes.
**Miscellaneous Material:**

Internal building material on structural components, structural members, or fixtures such as floor and ceiling tiles.

### 2.5 Description of Sampling and Testing

Sampling was performed on all assessable and readily available suspected asbestos-containing materials (ACM) identified as materials that may be disturbed during possible demolition. Sample analysis was performed to determine the presence, if any, of asbestos content in the friable materials. Destructive sampling was performed. Sampling was performed in accordance with all State, Federal and Local governmental agency policies, procedures and regulations. Desert Analytical participates in the AIHA/NIOSH and (PAT) Programs and AIHA Bulk Sample Round Robin Program.

### 2.6 Sample Summary

During our site inspection of this site at the request of our client, a total of 9 samples were obtained, with 15 individual layers from 5 homogenous areas. Representative samples were collected and submitted for laboratory analysis.

### 2.7 Analysis of Bulk Samples

Asbestos bulk analysis was performed on all of the samples by EMSL Analytical, Inc. with Polarized Light Microscopy (PLM) is the EPA approved method for analyzing bulk materials for asbestos. PLM utilizes a light microscope equipped with polarizing filters.

The identification of asbestos fiber bundles is determined by visual properties displayed when the sample is treated with various dispersion staining liquids. The actual structure of the fiber and the effect of polarized light on the fiber, all of which is viewed by a trained technician, substantiate identification. The limit of detection of asbestos is about one percent (1%) by area.

**Attachments:**
- Tables
- Laboratory Data
- Sample Location Descriptions

### Table 1 - Description of suspected homogeneous ACM sampled

<table>
<thead>
<tr>
<th>Area #</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Window glazing</td>
</tr>
<tr>
<td>2</td>
<td>Concrete slab</td>
</tr>
<tr>
<td>3</td>
<td>Drywall</td>
</tr>
<tr>
<td>4</td>
<td>Building caulking</td>
</tr>
<tr>
<td>5</td>
<td>Roofing</td>
</tr>
</tbody>
</table>
Table 2 – List of Suspect ACM Homogeneous Areas Sampled/Assumed

Samples shaded and bolded are asbestos containing.

<table>
<thead>
<tr>
<th>Sample Number</th>
<th>HA #</th>
<th>Description / Location</th>
<th>Condition</th>
<th>Asbestos</th>
<th>Friable</th>
</tr>
</thead>
<tbody>
<tr>
<td>3701-1</td>
<td>1</td>
<td>Window glazing</td>
<td>G</td>
<td>N</td>
<td>N</td>
</tr>
<tr>
<td>3701-2</td>
<td>1</td>
<td>Window glazing  West window</td>
<td>G</td>
<td>Y</td>
<td>N</td>
</tr>
<tr>
<td>3701-3</td>
<td>2</td>
<td>Concrete slab</td>
<td>G</td>
<td>N</td>
<td>N</td>
</tr>
<tr>
<td>3701-4</td>
<td>2</td>
<td>Concrete slab</td>
<td>G</td>
<td>N</td>
<td>N</td>
</tr>
<tr>
<td>3701-5</td>
<td>3</td>
<td>Drywall</td>
<td>G</td>
<td>N</td>
<td>N</td>
</tr>
<tr>
<td>3701-6</td>
<td>3</td>
<td>Drywall</td>
<td>G</td>
<td>N</td>
<td>N</td>
</tr>
<tr>
<td>3701-7</td>
<td>4</td>
<td>Caulking</td>
<td>G</td>
<td>N</td>
<td>N</td>
</tr>
<tr>
<td>3701-8</td>
<td>1</td>
<td>Roofing  Over north shed east end</td>
<td>G</td>
<td>Y</td>
<td>N</td>
</tr>
<tr>
<td>3701-9</td>
<td>3</td>
<td>Roofing  Over north shed west end</td>
<td>G</td>
<td>N</td>
<td>N</td>
</tr>
</tbody>
</table>

Table 3 - List of Asbestos-Containing Building Materials Greater than 1%

<table>
<thead>
<tr>
<th>Location</th>
<th>Description/Building Material</th>
<th>Sample #</th>
<th>Analytical Results</th>
<th>Category*</th>
<th>Friable Y/N</th>
<th>Estimated Amounts</th>
</tr>
</thead>
<tbody>
<tr>
<td>All metal sash windows</td>
<td>Window glazing</td>
<td>3701-2,</td>
<td>2% Chrysotile</td>
<td>Cat II</td>
<td>N</td>
<td>10 SF</td>
</tr>
<tr>
<td>Between metal bldg. and north</td>
<td>Roofing flashing sealant</td>
<td>3701-8,</td>
<td>15% Chrysotile</td>
<td>Cat I</td>
<td>Y</td>
<td>100 SF</td>
</tr>
<tr>
<td>and north attached shed</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

* Assessment Categories
1. RACM
2. Category I
3. Category II
4. Any Remaining Friable ACBM
**Asbestos Chain of Custody**

**EML Order Number (Lab Use Only):**

0 -01 & 29 -08 -8

**Company Name:** Southwest Hazard Control

**Street:** 1953 W. Grant Road

**Zip/Postal Code:** 85745

**Country:** USA

**Telephone:** 520-437-5162

**Fax:**

**E-mail:** smaxam@swaz.com

**Project Name/Number:** T89851

**U.S. State Samples Taken:** AZ

**Bill to:**

☐ Same ☐ Different + If bill to is different, note instructions in Comments

Third Party Billing requires written authorization from third party

**Turnaround Time (TAT) Options**

- 3 Hour
- 6 Hour
- 24 Hour
- 48 Hour
- 72 Hour
- 96 Hour
- 1 Week
- 2 Week

*For TEM 48 hr through 60 hr, please call ahead to schedule.* There is a premium charge for 3 hour TEM AHERA or EPA Level II TAT. You will be asked to sign an authorization form for this service. Analytes completed in accordance with EML's Terms and Conditions located in the Analytical Price Guide.

---

**PCMs - Air:**

☐ Check if samples are from NY

☐ NIOSH 7400

☐ w/ OSHA 8hr. TWA

---

**PLM - Bulk (reporting limit):**

☐ PLM EPA 600/R-93/116 (<1%)

---

**TEM - Air:**

☐ AHERA 40 CFR, Part 763

☐ NIOSH 7402

☐ ISO 10312

---

**TEM - Bulk:**

☐ TEM EPA NOB

☐ NYS NOB 198.4 (non-tribal-NY)

☐ Chauffeur SOP

---

**TEM - Water:**

☐ EPA 100.2

Fibers >10um ☐ Waste ☐ Drinking

All Fiber Sizes ☐ Waste ☐ Drinking

---

**Sample #** | **Sample Description** | **Volume/Area (Air)** | **Volume/Area (Bulk)** | **Date/Time Sampled**
--- | --- | --- | --- | ---
3701-1 | Window glazing | South window | HA # (Bulk) | 9/25/18
3701-2 | Window glazing | West window | | |
3701-3 | Concrete slab | South end | | |
3701-4 | Concrete slab | East end | | |
3701-5 | Drywell | Interior office | | |

**Client Sample # (s):**

Total # of Samples: 9

**Received (Lab):**

Date: 9-25-18 Time: 3:00A

**Comments/Special Instructions:**

---

**Page 1 of 2**
<table>
<thead>
<tr>
<th>Sample #</th>
<th>Sample Description</th>
<th>Volume/Area (Air) HA # (Bulk)</th>
<th>Date/Time Sampled</th>
</tr>
</thead>
<tbody>
<tr>
<td>3701-6</td>
<td>Drywall Interior office</td>
<td></td>
<td>9/25/18</td>
</tr>
<tr>
<td>3701-7</td>
<td>Caulking Metal panel north end</td>
<td></td>
<td></td>
</tr>
<tr>
<td>3701-8</td>
<td>Roofing Over north shed east</td>
<td></td>
<td></td>
</tr>
<tr>
<td>3701-9</td>
<td>Roofing Over north shed west</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

*Comments/Special Instructions:

<table>
<thead>
<tr>
<th>Sample</th>
<th>Description</th>
<th>Appearance</th>
<th>% Fibrous</th>
<th>% Non-Fibrous</th>
<th>Asbestos % Type</th>
</tr>
</thead>
<tbody>
<tr>
<td>3701-1</td>
<td>South Window - Window Glazing</td>
<td>Gray/White</td>
<td>100% Non-fibrous (Other)</td>
<td>None Detected</td>
<td></td>
</tr>
<tr>
<td>3701-2</td>
<td>West Window - Window Glazing</td>
<td>Gray Fibrous</td>
<td>98% Non-fibrous (Other)</td>
<td>2% Chrysotile</td>
<td></td>
</tr>
<tr>
<td>3701-3</td>
<td>South End - Concrete Slab</td>
<td>Tan Non-Fibrous</td>
<td>100% Non-fibrous (Other)</td>
<td>None Detected</td>
<td></td>
</tr>
<tr>
<td>3701-4</td>
<td>East End - Concrete Slab</td>
<td>Gray Non-Fibrous</td>
<td>100% Non-fibrous (Other)</td>
<td>None Detected</td>
<td></td>
</tr>
<tr>
<td>3701-5</td>
<td>Interior Office - Drywall</td>
<td>Brown/White</td>
<td>20% Cellulose</td>
<td>76% Non-fibrous (Other)</td>
<td>None Detected</td>
</tr>
<tr>
<td>3701-6</td>
<td>Interior Office - Drywall</td>
<td>Brown/White</td>
<td>15% Cellulose</td>
<td>80% Non-fibrous (Other)</td>
<td>None Detected</td>
</tr>
<tr>
<td>3701-7</td>
<td>Metal Panel North End - Caulking</td>
<td>White</td>
<td>100% Non-fibrous (Other)</td>
<td>None Detected</td>
<td></td>
</tr>
<tr>
<td>3701-8</td>
<td>Shingle Over North Shed East - Roofing</td>
<td>White/Black Fibrous</td>
<td>25% Glass</td>
<td>75% Non-fibrous (Other)</td>
<td>None Detected</td>
</tr>
<tr>
<td>3701-8</td>
<td>Shingles 2 Over North Shed East - Roofing</td>
<td>Ten/Black Fibrous</td>
<td>35% Cellulose</td>
<td>65% Non-fibrous (Other)</td>
<td>None Detected</td>
</tr>
<tr>
<td>3701-8</td>
<td>Tar Paper Over North Shed East - Roofing</td>
<td>Ite Black Fibrous</td>
<td>70% Cellulose</td>
<td>30% Non-fibrous (Other)</td>
<td>None Detected</td>
</tr>
<tr>
<td>3701-8</td>
<td>Flashing Over North Shed East - Roofing</td>
<td>Brown/Black Fibrous</td>
<td>2% Cellulose</td>
<td>83% Non-fibrous (Other)</td>
<td>15% Chrysotile</td>
</tr>
<tr>
<td>3701-8</td>
<td>Tar Over North Shed East - Roofing</td>
<td>Black Non-Fibrous</td>
<td>3% Cellulose</td>
<td>97% Non-fibrous (Other)</td>
<td>None Detected</td>
</tr>
<tr>
<td>3701-9</td>
<td>Shingle Over North Shed West - Roofing</td>
<td>White/Black Fibrous</td>
<td>20% Glass</td>
<td>80% Non-fibrous (Other)</td>
<td>None Detected</td>
</tr>
<tr>
<td>3701-9</td>
<td>Tar Over North Shed West - Roofing</td>
<td>Black Fibrous</td>
<td>10% Cellulose</td>
<td>90% Non-fibrous (Other)</td>
<td>None Detected</td>
</tr>
<tr>
<td>3701-9</td>
<td>Tar Paper Over North Shed West - Roofing</td>
<td>Black Fibrous</td>
<td>70% Cellulose</td>
<td>30% Non-fibrous (Other)</td>
<td>None Detected</td>
</tr>
</tbody>
</table>
Training Director: Carole Benz
Instructor: Brian Cleghorn

Issue/Exam Date: December 19, 2017
Certificate #: 00820342
Expiration Date: December 19, 2018
Training Date: December 19, 2017

ETC Compliance Solutions

Stanley P. Maxam

XXX-XX-8070

ETC Compliance Solutions is accredited by the State of Texas License No. 00-0076 meeting the required training for asbestos accreditation under TSCA Title II. This is to certify that the following individual has passed a competency exam.

Asbestos Building Inspector - Refresher
Certificate of Achievement
Asbestos Containing Building Material Survey

Former Dickey & Sons Property Residence at 3718 E. Hampton Street (Bldg. #4) Tucson, AZ

Report Date: October 5, 2018

SHC-T18651
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<td>Chain of Custodies</td>
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<tr>
<td>Section 5.0</td>
<td>Certification</td>
</tr>
<tr>
<td></td>
<td>Inspectors Certification</td>
</tr>
</tbody>
</table>
INSPECTION INFORMATION SHEET

Inspection Firm: Southwest Hazard Control, Inc.
1953 West Grant Road
Tucson, Arizona 85745

Current Owner(s): Pima County Department of Environmental Quality
33 N. Stone Avenue #700
Tucson, AZ 85701

Site Address: 3718 E. Hampton Street (bldg. #4)

Date of Inspection: September 25, 2018

Laboratory: EMSL Analytical, Inc.
200 Route 130 North Cinnaminson
NJ 08077
Total Samples: 2
Analysis Date: September 26, 2018

Name of Inspector: Stanley P. Maxam

AHERA Certificate No: 08820342

Training Provider: ETC Compliance Solutions

Date of Expiration: December 19, 2018
2.0 INSPECTION REPORT

2.1 Introduction

Southwest Hazard Control, Inc. ("hereafter known as SHC") was contacted by Kimberly Baeza of the Pima County Department of Environmental Quality, to have SHC visit the subject site and collect bulk samples of readily available suspect building materials that may be disturbed during possible demolition activities. Sampling was to be collected of building materials with analysis performed by an independent 3rd party laboratory.

Stan Maxam of SHC conducted the site reconnaissance and subsequent sampling on September 25, 2018. Mr. Maxam is an employee of SHC and is an EPA AHERA Accredited Licensed Asbestos Building Inspector, experienced in performing asbestos surveys.

The following summaries apply:

ACM Identified by Testing

3718 E. Hampton Street - (bldg. 4) No asbestos materials are present in the structure.

Note:

Various regulatory agencies have jurisdiction over projects dealing with the assessment PACAM (Presumed Asbestos Containing Materials) and abatement of ACBM's (Asbestos Containing Building Materials). The EPA regulates building materials that contain greater than 1 percent asbestos. Pima County enforces the EPA NESHAP rule with respect to releases of asbestos to the environment. OSHA regulates asbestos removal projects as they relate to worker safety and exposure issues. Airborne asbestos fibers must be below the OSHA standard of 0.10 fibers per cubic centimeter.

** OSHA does not recognize composite sampling protocol (<1%) as related to worker safety and requires proper removal techniques and training.

Category I & II ACM’s (Asbestos Containing Materials) should be removed prior to demolition. Normal demolition/renovation activities involve heavy equipment and crushing of building materials, this could render these ACM’s friable and all related building materials. All these materials would then need to be handled and disposed of as Regulated ACM’s and possibly causing a violation of the NESAP affecting the Owner & Operator.

A written notification must be provided to the PCDEQ NESHAP coordinator at least 10 working days prior to asbestos abatement projects involving the removal of greater than 160 square feet of a surfacing material, 260 linear feet of pipe length or one cubic yard of regulated asbestos material.

- Prior to demolition or renovation a copy of the survey should be included with application for permit to Pima County Department of Environmental Quality, County, and City Permit departments.
- A copy should also be made available to the contractor selected to do demolition or renovation and kept on site at all times.
- The owner should retain a licensed and qualified asbestos abatement contractor to perform abatement activities. The general contractor, if one is retained for renovation or demolition, may be the best source for local, licensed abatement contractors.
- Before the abatement of asbestos containing materials from the facility, the abatement contractor or the general contractor should provide the 10 working day notification using forms supplied by PCDEQ, EPA Region 9, or the State of Arizona. The notification should include information relating to the abatement work and at the demolition/renovation work.
The owner should ensure that the general contractor and/or abatement contractor provide notice to any people who may be in the area during abatement work (building occupants, other subcontractors, etc.) of the asbestos abatement work.

This document is prepared by SHC and is designated for the sole use of the Owner and/or any regulatory agency that may be directly involved with this property. No other party should rely on the information contained herein without prior written consent of SHC, Inc. This report shall not be reproduced except in full, without the written consent of the Owner.

2.2 Scope of Services

According to the information provided to SHC the buildings on the property may be demolished in the near future. Applicable asbestos regulations require that the buildings or the portions affected by demolition or renovation be thoroughly inspected for asbestos prior to such activities by an AHERA accredited inspector. The purpose and scope of our services was to inspect, identify, and assess suspected asbestos-containing materials that are, or may, at some point become subject to site demolition. SHC was contacted for the purpose of identifying all readily available and assessable suspect asbestos containing building materials prior to the work scheduled at this site.

2.3 Site Information

This is a former metal storage unit.

2.4 Survey Methodology

This asbestos compliance survey was accomplished by visually inspecting the subject areas as directed and identifying suspect ACM's within the areas to be disturbed during the possible demolition. A comprehensive visual inspection of the area was performed to acquaint the inspector(s) with an overview of the site. Random samples were taken from interiors and exteriors of the structures. Sampling locations were listed with description given for each sample along with location numbered and sampling location. All interior and exterior areas were visited. Destructive sampling was performed. If questionable items are encountered and revealed, stop work and contact SHC (520-622-3607) for further testing and evaluation.

Random representative samples of homogeneous materials were taken using variations of a random sample pattern. When random sampling could not be conducted, convenient sampling was performed. Samples taken were given individual numbers, prefixed with an area number and recorded on collection sheets and laboratory chain of custody sheets.

The suspect materials identified during our site visit were classified for the type of building material under the following categories:

Surfacing Material:

Material that is sprayed-on, trowled on or otherwise applied to surfaces, such as acoustical plaster on ceilings and fireproofing materials on structural members, or other surface materials used for acoustical, fireproofing or other purposes.
2.5 Description of Sampling and Testing

Sampling was performed on all assessable and readily available suspected asbestos-containing materials (ACM) identified as materials that may be disturbed during possible demolition. Sample analysis was performed to determine the presence, if any, of asbestos content in the friable materials. Destructive sampling was performed. Sampling was performed in accordance with all State, Federal and Local governmental agency policies, procedures and regulations. Desert Analytical participates in the AIHA/NIOSH and (PAT) Programs and AIHA Bulk Sample Round Robin Program.

2.6 Sample Summary

During our site inspection of this site at the request of our client, a total of 2 samples were obtained, with 2 individual layers from 1 homogenous area. Representative samples were collected and submitted for laboratory analysis.

2.7 Analysis of Bulk Samples

Asbestos bulk analysis was performed on all of the samples by EMSI Analytical, Inc. with Polarized Light Microscopy (PLM) is the EPA approved method for analyzing bulk materials for asbestos. PLM utilizes a light microscope equipped with polarizing filters.

The identification of asbestos fiber bundles is determined by visual properties displayed when the sample is treated with various dispersion staining liquids. The actual structure of the fiber and the effect of polarized light on the fiber, all of which is viewed by a trained technician, substantiate identification. The limit of detection of asbestos is about one percent (1%) by area.

Attachments: Tables
Laboratory Data
Sample Location Descriptions

Table 1 – Description of suspected homogeneous ACBM sampled

<table>
<thead>
<tr>
<th>Area #</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Concrete slab</td>
</tr>
</tbody>
</table>
Table 2 – List of Suspect ACM Homogeneous Areas Sampled/Assumed

Samples **shaded** and **bolded** are asbestos containing.

<table>
<thead>
<tr>
<th>Sample Number</th>
<th>HA #</th>
<th>Description / Location</th>
<th>Condition</th>
<th>Asbestos</th>
<th>Friable</th>
</tr>
</thead>
<tbody>
<tr>
<td>3718-1</td>
<td>1</td>
<td>Concrete slab</td>
<td>West end</td>
<td>G</td>
<td>N</td>
</tr>
<tr>
<td>3718-2</td>
<td>1</td>
<td>Concrete slab</td>
<td>North end</td>
<td>G</td>
<td>N</td>
</tr>
</tbody>
</table>
**Asbestos Chain of Custody**

**EMSL Order Number (Lab Use Only):**

041829084

---

**Company Name:** Southwest Hazard Control

**EMSL Customer ID:**

**Street:** 1593 W. Grant Road

**City:** Tucson

**Zip/Postal Code:** 85745

**Country:** USA

**Telephone #:** 520-437-5162

**Report To (Name):** Stan Maxam

**Fax #:**

**Email Address:** smaxam@swaz.com

**EMSL Project ID [Internal Use Only]:**

**Purchase Order:**

**Report Name/Number:** T18651

**U.S. State Samples Taken:** AZ

**EMSL-Bill to:**

☐ Same  ☐ Different - If different note instructions in Comments*

Third Party Billing requires written authorization from third party

**Turnaround Time (TAT) Options* - Please Check**

☐ 3 Hour  ☐ 6 Hour  ☐ 24 Hour  ☐ 48 Hour  ☐ 72 Hour  ☐ 96 Hour  ☐ 1 Week  ☐ 2 Week

---

**PCM - Air**

☐ Check if samples are from NY

☐ NIOSH 7400

☐ w/ OSHA 8hr. TWA

**PLM - Bulk (reporting limit)**

☐ PLM EPA 600/R-83/116 (<1%)

☐ PLM EPA NOB (<1%)

**Point Count**

☐ 400 (<0.25%)  ☐ 1000 (<0.1%)

**Point Count w/Gravimetric**

☐ 400 (<0.25%)  ☐ 1000 (<0.1%)

☐ NYS 198.1 (frangible in NY)

☐ NYS 198.6 NOB (non-frangible-NY)

☐ NYS 198.8 SOF-V

☐ NIOSH 0002 (<1%)

---

**TEM - Air**

☐ 4-4.5hr TAT (AHERRA only)

☐ AHERRA 40 CFR, Part 763

☐ NIOSH 7402

☐ EPA Level II

☐ ISO 10312

---

**TEM - Duct**

☐ Microrac - ASTM D 5755

☐ Wipe - ASTM D8480

☐ Carpet Sonication (EPA 600/J-93/167)

---

**SolifRock/Vermiculite**

☐ PLM EPA 600/R-83/116 with milling prep (<1%)

☐ PLM EPA 600/R-83/116 with milling prep (0 < 25%)

☐ TEM EPA 600/R-93/116 with milling prep (<1%)

☐ TEM EPA 600/R-93/116 with milling prep (0 < 25%)

☐ TEM Qualitative via Filtration Prep

☐ TEM Qualitative via Drop Mount Prep

☐ Cincinnati Method EPA 600/R-04/004 - PLM/TEM

(BC only)

---

**TEM - Water: EPA 100.2**

☐ Fibers >10µm

☐ Waste

☐ Drinking

All Fiber Sizes

☐ Waste

☐ Drinking

---

☐ Check For Positive Step - Clearly Identify Homogenous Group

☐ Filter Pore Size (Air Samples): 0.06µm

☐ 0.45µm

---

**samplers Name:** Stan Maxam

**samplers Signature:**

---

<table>
<thead>
<tr>
<th>Sample #</th>
<th>Sample Description</th>
<th>Volume/Area (Air)</th>
<th>Date/Time Sampled</th>
</tr>
</thead>
<tbody>
<tr>
<td>3718-1</td>
<td>Concrete slab</td>
<td></td>
<td>9/25/18</td>
</tr>
<tr>
<td>3718-2</td>
<td>Concrete slab</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

---

**Client Sample #: (s):**

---

**Received (Lab):**

---

**Comments/Special Instructions:**

---

Page 1 of 1
**Test Report: Asbestos Analysis of Bulk Materials via EPA 600/R-93/116 Method using Polarized Light Microscopy**

<table>
<thead>
<tr>
<th>Sample</th>
<th>Description</th>
<th>Appearance</th>
<th>% Fibrous</th>
<th>% Non-Fibrous</th>
<th>Asbestos % Type</th>
</tr>
</thead>
<tbody>
<tr>
<td>3718-01</td>
<td>West End - Concrete Slab</td>
<td>Grey</td>
<td>Non-Fibrous</td>
<td>Homogeneous</td>
<td>100% Non-fibrous (Other) None Detected</td>
</tr>
<tr>
<td>3718-02</td>
<td>North End - Concrete Slab</td>
<td>Brown/Gray</td>
<td>Non-Fibrous</td>
<td>Homogeneous</td>
<td>100% Non-fibrous (Other) None Detected</td>
</tr>
</tbody>
</table>

---

**EMSI maintains liability limited to cost of analysis. The above analyses were performed in general compliance with Appendix E to Subpart E of 40 CFR (previously EPA 600/M4-82-020 "Interim Method"), but augmented with procedures outlined in the 1993 ("Final") version of the method. This report relates only to the samples reported above, and may not be reproduced, except in full, without written approval by EMSI. EMSI bears no responsibility for sample collection activities or analytical method limitations. Interpretation and use of test results are the responsibility of the client. All samples received in acceptable condition unless otherwise noted. This 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. EMSI recommends gravimetric reduction for all non-friable organically bound materials prior to analysis. Estimation of uncertainty is available on request.**

**Samples analyzed by EMSI Analytical, Inc., Cinnaminson, NJ NVLAP Lab Code 101483-3, AIHA-LAP, LLC H-LAP Lab 100194, NYS ELAP 10872, NJ DEP 08036, PA ID# 68-0088.**

---

**Analyst(s):**
Alexis Kurn (1)
Natalia DiPipessa (1)

---

**Signature:**
Benjamin Ellis, Laboratory Manager
or Other Approved Signatory
Certificate of Achievement

Asbestos Building Inspector — Refresher

Stanley P. Maxam

Training Date: December 19, 2017
Expiration Date: December 19, 2018
Certificate #: 08820342

This is to certify that the following individual has passed a competency exam meeting the requisite training for Asbestos Accreditation under TSCA Title II.

ETC Compliance Solutions is accredited by the State of Texas License No. 00-0076.

Training Director: Carole Benz

Instructor: Brian Gladhart
Asbestos Containing
Building Material Survey

Former Hickey & Sons Property
Metal Structure at 3702 E. Hampton Street
(Bldg. #5)
Tucson, AZ

Report Date: October 5, 2018

SHC-T18651
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Asbestos Inspection Information Sheet  
Site Map

Section 2.0  
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2.2 Scope of Services  
2.3 Site Information  
2.4 Survey of Methodology  
2.5 Description of Sampling and Testing  
2.6 Sample Summary  
2.7 Analysis of Bulk Samples  
2.8 Conclusion

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Certification  
Inspectors Certification
INSPECTION INFORMATION SHEET

Inspection Firm: Southwest Hazard Control, Inc.
1953 West Grant Road
Tucson, Arizona 85745

Current Owner(s): Pima County Department of Environmental Quality
33 N. Stone Avenue #700
Tucson, AZ 85701

Site Address: 3702 E. Hampton Street (bldg. #5)

Date of Inspection: September 25, 2018

Laboratory: EMSL Analytical, Inc.
200 Route 130 North Cinnaminson
NJ 08077
Total Samples: 2
Analysis Date: September 26, 2018

Name of Inspector: Stanley P. Maxam
AHERA Certificate No: 08820342
Training Provider: ETC Compliance Solutions
Date of Expiration: December 19, 2018
2.0 INSPECTION REPORT

2.1 Introduction

Southwest Hazard Control, Inc. ("hereafter known as SHC") was contacted by Kimberly Baeza of the Pima County Department of Environmental Quality, to have SHC visit the subject site and collect bulk samples of readily available suspect building materials that may be disturbed during possible demolition activities. Sampling was to be collected of building materials with analysis performed by an independent 3rd party laboratory.

Stan Maxam of SHC conducted the site reconnaissance and subsequent sampling on September 25, 2018. Mr. Maxam is an employee of SHC and is an EPA AHERA Accredited Licensed Asbestos Building Inspector, experienced in performing asbestos surveys.

The following summaries apply:

ACM Identified by Testing

3702 E. Hampton Street - (bldg. 5) No asbestos materials are present in the structure.

Note:

Various regulatory agencies have jurisdiction over projects dealing with the assessment PACAM (Presumed Asbestos Containing Materials) and abatement of ACBMs (Asbestos Containing Building Materials). The EPA regulates building materials that contain greater than 1 percent asbestos. Pima County enforces the EPA NESHAP rule with respect to releases of asbestos to the environment. OSHA regulates asbestos removal projects as they relate to worker safety and exposure issues (airborne asbestos fibers must be below the OSHA standard of 0.10 fibers per cubic centimeter).

** OSHA does not recognize composite sampling protocol (<1%) as related to worker safety and requires proper removal techniques and training.

Category I & II-ACM's (Asbestos Containing Materials) should be removed prior to demolition. Normal demolition/renovation activities involve heavy equipment and crushing of building materials, this could render these ACM's friable and all related building materials. All these materials would then need to be handled and disposed of as Regulated ACM's and possibly causing a violation of the NESAP affecting the Owner & Operator.

A written notification must be provided to the PCDEQ NESHAP coordinator at least 10 working days prior to asbestos abatement projects involving the removal of greater than 160 square feet of a surfacing material, 260 linear feet of pipe length or one cubic yard of regulated asbestos material.

- Prior to demolition or renovation a copy of the survey should be included with application for permit to Pima County Department of Environmental Quality, County, and City Permit departments.
- A copy should also be made available to the contractor selected to do demolition or renovation and kept on site at all times.
- The owner should retain a licensed and qualified asbestos abatement contractor to perform abatement activities. The general contractor, if one is retained for renovation or demolition, may be the best source for local, licensed abatement contractors.
- Before the abatement of asbestos containing materials from the facility, the abatement contractor or the general contractor should provide the 10 working day notification using forms supplied by PCDEQ, EPA Region 9, or the State of Arizona. The notification should include information relating to the abatement work and at the demolition/renovation work.
The owner should ensure that the general contractor and/or abatement contractor provide notice to any people who may be in the area during abatement work (building occupants, other subcontractors, etc.) of the asbestos abatement work.

This document is prepared by SHC and is designated for the sole use of the Owner and/or any regulatory agency that may be directly involved with this property. No other party should rely on the information contained herein without prior written consent of SHC, Inc. This report shall not be reproduced except in full, without the written consent of the Owner.

2.2 Scope of Services

According to the information provided to SHC the buildings on the property may be demolished in the near future. Applicable asbestos regulations require that the buildings or the portions affected by demolition or renovation be thoroughly inspected for asbestos prior to such activities by an AHERA accredited inspector. The purpose and scope of our services was to inspect, identify, and assess suspected asbestos-containing materials that are, or may, at some point become subject to site demolition. SHC was contacted for the purpose of identifying all readily available and assessable suspect asbestos containing building materials prior to the work scheduled at this site.

2.3 Site Information

This is a former metal storage unit.

2.4 Survey Methodology

This asbestos compliance survey was accomplished by visually inspecting the subject areas as directed and identifying suspect ACM’s within the areas to be disturbed during the possible demolition. A comprehensive visual inspection of the area was performed to acquaint the inspector(s) with an overview of the site. Random samples were taken from interiors and exteriors of the structures. Sampling locations were listed with description given for each sample along with location numbered and sampling location. All interior and exterior areas were visited. Destructive sampling was performed. If questionable items are encountered and revealed, stop work and contact SHC (520-622-3607) for further testing and evaluation.

Random representative samples of homogeneous materials were taken using variations of a random sample pattern. When random sampling could not be conducted, convenient sampling was performed. Samples taken were given individual numbers, prefixed with an area number and recorded on collection sheets and laboratory chain of custody sheets.

The suspect materials identified during our site visit were classified for the type of building material under the following categories:

**Surfacing Material:**

Material that is sprayed-on, trowled on or otherwise applied to surfaces, such as acoustical plaster on ceilings and fireproofing materials on structural members, or other surface materials used for acoustical, fireproofing or other purposes.
Miscellaneous Materials
Internal building material on structural components, structural members, or fixtures such as floor and ceiling tiles.

2.5 Description of Sampling and Testing
Sampling was performed on all assessable and readily available suspected asbestos-containing materials (ACM) identified as materials that may be disturbed during possible demolition. Sample analysis was performed to determine the presence, if any, of asbestos content in the friable materials. Destructive sampling was performed. Sampling was performed in accordance with all State, Federal and Local governmental agency policies, procedures and regulations. Desert Analytical participates in the AIHA/NIOSH and (PACT) Programs and AIHA Bulk Sample Round Robin Program.

2.6 Sample Summary
During our site inspection of this site at the request of our client, a total of 2 samples were obtained, with 2 individual layers from 1 homogenous area. Representative samples were collected and submitted for laboratory analysis.

2.7 Analysis of Bulk Samples
Asbestos bulk analysis was performed on all of the samples by EMSL Analytical, Inc. with Polarized Light Microscopy (PLM) is the EPA approved method for analyzing bulk materials for asbestos. PLM utilizes a light microscope equipped with polarizing filters. The identification of asbestos fiber bundles is determined by visual properties displayed when the sample is treated with various dispersion staining liquids. The actual structure of the fiber and the effect of polarized light on the fiber, all of which is viewed by a trained technician, substantiate identification. The limit of detection of asbestos is about one percent (1%) by area.

Attachments: Tables
Laboratory Data
Sample Location Descriptions

Table 1 - Description of suspected homogeneous ACBM sampled

<table>
<thead>
<tr>
<th>Area #</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Concrete slab</td>
</tr>
</tbody>
</table>
Table 2 – List of Suspect ACM Homogeneous Areas Sampled/Assumed

Samples shaded and bolded are asbestos containing.

<table>
<thead>
<tr>
<th>Sample Number</th>
<th>HA #</th>
<th>Description / Location</th>
<th>Condition</th>
<th>Asbestos</th>
<th>Friable</th>
</tr>
</thead>
<tbody>
<tr>
<td>3702-1</td>
<td>1</td>
<td>Concrete slab East end</td>
<td>G</td>
<td>N</td>
<td>N</td>
</tr>
<tr>
<td>3702-2</td>
<td>1</td>
<td>Concrete slab Northwest corner</td>
<td>G</td>
<td>N</td>
<td>N</td>
</tr>
</tbody>
</table>
Company Name: Southwest Hazard Control  
EMS Customer ID: 

Street: 1953 W. Grant Road  
City: Tucson  

Zip/Postal Code: 85745  
State/Province: AZ  

Country: USA  

Report To (Name): Stan Maxam  
Telephone #: 520-437-5162  
Fax #: 

Email Address: smaxam@swhaz.com  
Please Provide Results:  

Purchase Order:  

Project Name/Number: T18561  
EMS Project ID: (Internal Use Only): 

U.S. State Sampled: AZ  
CT Samples:  

EMS-Bill to:  

3 Hour  
6 Hour  
24 Hour  
48 Hour  
72 Hour  
96 Hour  
1 Week  
2 Week  

Turnaround Time (TAT) Options* – Please Check 

For TEM As 3 hr through 11 hr, please call ahead to schedule. There is a premium charge for 3 hour TEM AHERA on EPA Level II TAT. You will be asked to sign an authorization form for this service. Analysis completed in accordance with EMS’s Terms and Conditions located in the Analytical Price Guide. 

PCD - Air  
Check if samples are from NY  

NIOSH 7400  
N/OSHA, 8hr TWA  

PLM - Bulk (reporting limit)  

PLM EPA 890/R-83/116 (<1%)  

Point Count  

<0.25%  
1.00% (<1%)  

Point Count w/Gravimetric  

<0.25%  
1.00% (<1%)  

NYS 186.1 (frangible in NY)  
NYS 186.6 NOB (non-frangible-NY)  
NYS 186.8 SOF-V  
NOSH 0002 (<1%)  

TEM - Air  

4.4hr TAT (AHERA only)  

ìAHERA 40 CFR, Part 763  

NIOSH 7402  

ISO 10312  

TEM - Bulk  

EMI EPA NOB  

EMI NOB 188.4 (non-frangible-NY)  

Sift/Soft SOP  

EMI Mass Analysis-EPA 600 sec. 2.5  

TEM - Water  

EPA 100.2  

Fibers >10µm  
Waste  
Drinking 

All Fiber Sizes  
Waste  
Drinking 

Filter Pore Size (Air Samples):  

0.8µm  
0.45µm  

Check For Positive Stop – Clearly Identify Homogenous Group  

Samples Name: Stan Maxam  

Sample #  

Sample Description  

Volume/Area (Air)  

HA # (Bulk)  

Date/Time/Date  

3706-1  
Concrete slab  
East end  
9/25/18  

3706-2  
Concrete slab  
Northwest corner  

Client Sample # (s):  

Total # of Samples: 2  

Rollinquished (Client):  

Date: 9/25/18  
Time: 3:00 pm 

Received (Lab):  

Date: 9/16/14  
Time: 9:19 

Comments/Special Instructions:
## Test Report: Asbestos Analysis of Bulk Materials via EPA 600/R-93/116 Method using Polarized Light Microscopy

<table>
<thead>
<tr>
<th>Sample</th>
<th>Description</th>
<th>Appearance</th>
<th>% Fibrous</th>
<th>% Non-Fibrous</th>
<th>Asbestos Type</th>
</tr>
</thead>
<tbody>
<tr>
<td>3702-1</td>
<td>East End - Concrete Slab</td>
<td>Tan</td>
<td></td>
<td>100% Non-fibrous (Other)</td>
<td>None Detected</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>3702-2</td>
<td>Northwest Corner - Concrete Slab</td>
<td>Gray</td>
<td></td>
<td>100% Non-fibrous (Other)</td>
<td>None Detected</td>
</tr>
</tbody>
</table>

Analyst(s)
Natalia Dispensa (2)

Initial report from: 09/26/2018 23:12:27

ASL_PLM_0008_0691 - 1.79 Printed: 9/26/2018 11:12 PM
Training Director: Carole Benz
Instructor: Brian Gladhart

Issue / Exam Date: December 19, 2017
Certificate #: 08820342
Expiration Date: December 19, 2018
Training Date: December 19, 2017

XXX-XX-8070

Stanley P. Macam

ETC Compliance Solutions is accredited by the State of Texas License No. 00-0076

This is to certify that the following individual has passed a competency exam

Asbestos Building Inspector - Refresher

Certificate of Achievement
Engineering and Environmental Consultants was contracted by Pima County to perform an expanded Phase I Environmental Site Assessment for one parcel (herein referred to as “the property”). The Pima County Assessor’s Parcel Number associated with the property is 112-16-171A. The property consists of approximately 1.11 acres located in Section 4, Township 14 South, Range 14 East Gila and Salt River Baseline and Meridian, Pima County, Arizona.

The assessment revealed the following Recognized Environmental Conditions (RECs) in connection with the property.

REC 1 – petroleum stained soil along the south side of the large Quonset building located on the southwest portion of the property. Petroleum stained soil should be removed, properly disposed and confirmation sampling conducted.

REC 2 – former lube pit within the large Quonset building located near the southwest corner of the property; it is considered a REC due to its unknown construction and likelihood of receiving petroleum discharges from historical auto repair activities. An assessment should be performed to determine if the soil beneath the lube pit has been impacted. After assessment the lube pit should be removed or filled in should no use for it be identified.

REC 3 – drainage sump within the former covered auto repair area associated with the Quonset building on the south central portion of the property. It is considered a REC due to its unknown construction and likelihood of receiving discharges from historical auto repair activities. An assessment to determine if soils beneath the sump are impacted should be conducted; then the sump should be removed.

REC 4 – two five-gallon containers with unknown contents on the east-central boundary of the property. The containers are in poor condition and should be removed and properly disposed.

REC 5 – three stored transformers on the east-central boundary of the property, which have no labeling identifying them as free of polychlorinated biphenyls (PCBs). Removal and proper disposal of these transformer is recommended; as well as assessing whether the soils beneath them is contaminated with PCBs.

The assessment revealed the following Historical Recognized Environmental Condition (HREC) in connection with the subject property.

HREC – the property had five underground storage tanks (USTs) that were removed in 2001; however, no further action is recommended.

Observations and Recommendations

- The property has an unused aboveground storage tank (AST) with an oily water mixture,
and both should be removed and properly disposed.

- The access to the lube pit is not secure and presents a safety hazard. Access to the lube pit should be limited and a secure access cover installed.

- Solid waste and stored materials are found throughout the property; proper removal and disposal is recommended.

- Various stored containers are found in the interior and exterior of structures on the property; recycling or proper disposal of these materials is recommended.

- Suspect asbestos containing building material (ACBM) is present on the structures; an asbestos survey and abatement (if needed) should be conducted prior to demolition activities.

- Various building components of the structures have suspect lead-based paint. Lead-based paint testing may be required by the receiving landfill if the structures are demolished.

- It is possible that some portions of the property were serviced by a septic system in the past. Assuming only domestic waste was introduced into the septic system, no long-term environmental impact to the property would be expected. However, septic systems can be physical hazards during construction/demolition activities.