



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

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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

ATTACHMENT 1

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(E).

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.

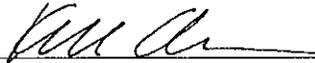
Passed and adopted, this _____ day of _____, 2018.

Chairman, Pima County Flood Control District
Board of Directors

ATTEST:

APPROVED AS TO FORM

Clerk of the Board



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.

ATTACHMENT 2



Solving Environmental Concerns Since 1982
Southwest Hazard Control, Inc.

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

Corporate Headquarters
1953 W. Grant Rd
Tucson, AZ 85745
Phone: 1-(800)-279-5266
Phone: (520)-622-3607
Fax: (520)-622-3643
Email: arizona@swhaz.com

2416 W. Campus Drive
Tempe, AZ 85282
Phone: 1-(866)-794-9040
Phone: (480)-517-9040
Fax: (480)-517-9140
Email: phoenix@swhaz.com

9112 Susan Ave S.E.
Albuquerque, NM 87123
Phone: 1-(800)-279-5268
Phone: (505)-298-6930
Fax: (505)-298-7142
Email: albuquerque@swhaz.com

712 Whitney Street
San Leandro, CA 94577
Phone: 1-(800)-326-8558
Phone: (510)-352-5152
Fax: (510)-352-5155
Email: california@swhaz.com

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Google Earth

© SPOT IMAGE

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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 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 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 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 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, 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 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

Area #	Description
1	Deco ceiling texture
2	Drywall / surfacing
3	Sheet vinyl
4	Attic insulation
5	Window glazing
6	Floor tile and mastic
7	Felt under wood siding
8	Duct sealant
9	Built up roofing

10	Roofing sealant
11	Block
12	Mortar
13	Concrete slab

Table 2 – List of Suspect ACM Homogeneous Areas Sampled/Assumed

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

<i>Sample Number</i>	<i>HA #</i>	<i>Description / Location</i>	<i>Condition</i>	<i>Asbestos</i>	<i>Friable</i>
3717-1	2	Drywall / surfacing By entry	G	Y	N
3717-2	2	Drywall / surfacing Dining room	G	Y	N
3717-3	2	Drywall / surfacing NW bedroom	G	Y	N
3717-4	2	Drywall / surfacing NE bedroom	G	Y	N
3717-5	2	Drywall / surfacing Kitchen	G	Y	N
3717-6	1	Deco ceiling texture Living room	G	Y	Y
3717-7	1	Deco ceiling texture Hallway	G	Y	Y
3717-8	1	Deco ceiling texture NW bedroom	G	Y	Y
3717-9	6	Floor tile and mastic NW corner	G	Y	N
3717-10	3	Sheet vinyl and mastic Kitchen	G	Y	Y
3717-11	3	Sheet vinyl and mastic Bathroom	G	Y	Y
3717-12	6	Floor tile and mastic Hallway	G	Y	N
3717-13	4	Attic insulation Above hallway	G	N	N
3717-14	5	Window glazing SE corner	G	<1%	N
3717-15	5	Window glazing South end	G	N	N
3717-16	7	Felt under wood siding SW corner of house	G	N	N
3717-17	7	Felt under wood siding NW corner of house	G	N	N
3717-18	8	Duct sealant Roof ductwork	G	N	N
3716-19	8	Duct sealant Roof ductwork	G	N	N
3717-20	9	Built up roofing South end of house	G	Y	N
3717-21	9	Built up roofing North end of house	G	Y	N
3717-22	10	Roofing sealant HVAC penetration	G	Y	N
3717-23	10	Roofing sealant Plumbing vent	G	Y	N
3717-24	12	Mortar By front entrance	G	N	N
3717-25	11	Block By front entrance	G	N	N
3717-26	13	Concrete slab NW corner of house	G	N	N

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

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

* Assessment Categories

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

Table 4- List of Less Than 1% Building Materials

Location	Description/Building Material	Sample #	Analytical Results	Category*	Friable Y/N	Estimated Amounts
All steel sash windows	Window glazing	3717-15	<1% Chrysotile	Unclassified	N	10 SF

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.**

Asbestos Chain of Custody EMSL Order Number (Lab Use Only)

041829100

EMSL ANALYTICAL INC.
1000 W. WASHINGTON AVE. TUCSON, AZ 85704

FAX: 520-437-5162
 TEL: 520-437-5162
 EMAIL: info@emsl.com

Company Name : Southwest Hazard Control Street: 1953 W. Grant Road Zip/Postal Code: 85745 Country: USA Report To (Name): Stan Maxam Email Address: smaxam@swhaz.com Project Name/Number: T18651 U.S. State Samples Taken:		EMSL Customer ID: City: Tucson State/Province: AZ Telephone #: 520-437-5162 Fax #: Please Provide Results: <input type="checkbox"/> Fax <input checked="" type="checkbox"/> Email Purchase Order: EMSL Project ID (Internal Use Only): CT Samples: <input type="checkbox"/> Commercial/Taxable <input type="checkbox"/> Residential/Tax Exempt	
EMSL-Bill to: <input checked="" type="checkbox"/> Same <input type="checkbox"/> Different - If Bill to is Different then insert Comments in Comments** Third Party Billing requires written authorization from third party			
Turnaround Time (TAT) Options ¹ - Please Check <input type="checkbox"/> 3 Hour <input type="checkbox"/> 6 Hour <input type="checkbox"/> 24 Hour <input checked="" type="checkbox"/> 48 Hour <input type="checkbox"/> 72 Hour <input type="checkbox"/> 96 Hour <input type="checkbox"/> 1 Week <input type="checkbox"/> 2 Week			
¹ For TEM Air 3 hr through 6 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. Analysis completed in accordance with EMSL's Terms and Conditions located in the Analytical Price Guide.			
PCM - Air <input type="checkbox"/> Check if samples are from NY <input type="checkbox"/> NIOSH 7400 <input type="checkbox"/> w/ OSHA 8hr, TWA PLM - Bulk (reporting limit) <input checked="" type="checkbox"/> PLM EPA 600/R-93/116 (<1%) <input type="checkbox"/> PLM EPA NOB (<1%) Point Count <input type="checkbox"/> 400 (<0.25%) <input type="checkbox"/> 1000 (<0.1%) Point Count w/Gravimetric <input type="checkbox"/> 400 (<0.25%) <input type="checkbox"/> 1000 (<0.1%) <input type="checkbox"/> NYS 198.1 (friable in NY) <input type="checkbox"/> NYS 198.6 NOB (non-friable-NY) <input type="checkbox"/> NYS 198.8 SOF-V <input type="checkbox"/> NIOSH 9002 (<1%)		TEM - Air <input type="checkbox"/> 4-4.5hr TAT (AHERA only) <input type="checkbox"/> AHERA 40 CFR, Part 763 <input type="checkbox"/> NIOSH 7402 <input type="checkbox"/> EPA Level II <input type="checkbox"/> ISO 10312 TEM - Bulk <input type="checkbox"/> TEM EPA NOB <input type="checkbox"/> NYS NOB 198.4 (non-friable-NY) <input type="checkbox"/> Chatfield SOP <input type="checkbox"/> TEM Mass Analysis-EPA 600 sec. 2.5 TEM - Water: EPA 100.2 Fibers >10µm <input type="checkbox"/> Waste <input type="checkbox"/> Drinking All Fiber Sizes <input type="checkbox"/> Waste <input type="checkbox"/> Drinking	
<input type="checkbox"/> Check For Positive Stop - Clearly Identify Homogenous Group		Filter Pore Size (Air Samples): <input type="checkbox"/> 0.8µm <input type="checkbox"/> 0.45µm	
Samplers Name: Stan Maxam		Samplers Signature: <i>Stan Maxam</i>	
Sample #	Sample Description	Volume/Area (Air) HA # (Bulk)	Date/Time Sampled
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		
Client Sample # (s):		Total # of Samples: 26	
Relinquished (Client): <i>Stan Maxam</i>		Date: 9/22/18 Time: 3:00pm	
Received (Lab): <i>[Signature]</i>		Date: 9/26/18 Time: 9:00am	
Comments/Special Instructions:			

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Asbestos Chain of Custody

EMSL Order Number *(Lab Use Only)*:

041829100

EMSL ANALYTICAL, INC.
10000 W. 15th Ave. Suite 100
 Denver, CO 80202

09/20/18
 10:00 AM
 10/1/18
 10:00 AM
 10/2/18
 10:00 AM

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

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



EMSL Analytical, Inc.

200 Route 130 North Cinnaminson, NJ 08077
Tel/Fax: (800) 220-3675 / (856) 786-5974
<http://www.EMSL.com/cinnaslab@EMSL.com>

EMSL Order: 041829100
Customer ID: SOUT56
Customer PO:
Project ID:

Attention: Stan Maxam
Southwest Hazard Control, Inc.
1953 West Grant Road
Tucson, AZ 85745
Project: T18651
Phone: (520) 622-3607
Fax: (520) 622-3643
Received Date: 09/26/2018 9:30 AM
Analysis Date: 09/29/2018 - 09/30/2018
Collected Date: 09/22/2018

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

Sample	Description	Appearance	Non-Asbestos		Asbestos
			% Fibrous	% Non-Fibrous	% Type
3717-1-Drywall <i>041829100-0001</i>	By Entry - Drywall	Brown/White Fibrous Homogeneous	15% Cellulose	85% Non-fibrous (Other)	None Detected
3717-1-Surfacing <i>041829100-0001A</i>	By Entry - Surfacing	White Non-Fibrous Homogeneous		98% Non-fibrous (Other)	2% Chrysotile
3717-2-Drywall <i>041829100-0002</i>	Dining Room - Drywall	Brown/White Fibrous Homogeneous	15% Cellulose	85% Non-fibrous (Other)	None Detected
3717-2-Surfacing <i>041829100-0002A</i>	Dining Room - Surfacing	White Non-Fibrous Homogeneous		98% Non-fibrous (Other)	2% Chrysotile
3717-3-Drywall <i>041829100-0003</i>	NW Bedroom - Drywall	Brown/White Non-Fibrous Homogeneous	15% Cellulose	85% Non-fibrous (Other)	None Detected
3717-3-Surfacing <i>041829100-0003A</i>	NW Bedroom - Surfacing	White Non-Fibrous Homogeneous		98% Non-fibrous (Other)	2% Chrysotile
3717-4-Drywall <i>041829100-0004</i>	NE Bedroom - Drywall	Brown/White Fibrous Homogeneous	15% Cellulose	85% Non-fibrous (Other)	None Detected
3717-4-Surfacing <i>041829100-0004A</i>	NE Bedroom - Surfacing	White Non-Fibrous Homogeneous		98% Non-fibrous (Other)	2% Chrysotile
3717-5-Drywall <i>041829100-0005</i> <i>No drywall present</i>	Kitchen - Drywall				Not Submitted
3717-5-Surfacing <i>041829100-0005A</i>	Kitchen - Surfacing	White Non-Fibrous Homogeneous		98% Non-fibrous (Other)	2% Chrysotile
3717-6 <i>041829100-0006</i>	Living Room - Deco Ceiling Texture	White Non-Fibrous Homogeneous		97% Non-fibrous (Other)	3% Chrysotile
3717-7 <i>041829100-0007</i>	Hallway - Deco Ceiling Texture	White Non-Fibrous Homogeneous		97% Non-fibrous (Other)	3% Chrysotile
3717-8 <i>041829100-0008</i>	NW Bedroom - Deco Ceiling Texture	White Fibrous Homogeneous		96% Non-fibrous (Other)	4% Chrysotile
3717-9-Floor Tile <i>041829100-0009</i>	NE Corner - Floor Tile	Brown Non-Fibrous Homogeneous		95% Non-fibrous (Other)	5% Chrysotile
3717-9-Mastic <i>041829100-0009A</i>	NE Corner - Mastic	Black Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
3717-9-Mastic 2 <i>041829100-0009B</i>	NE Corner - Mastic	Yellow Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected

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



EMSL Analytical, Inc.
 200 Route 130 North Cinnaminson, NJ 08077
 Tel/Fax: (800) 220-3675 / (856) 786-5974
[http://www.EMSL.com / cinnaslab@EMSL.com](http://www.EMSL.com/cinnaslab@EMSL.com)

EMSL Order: 041829100
 Customer ID: SOUT56
 Customer PO:
 Project ID:

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

Sample	Description	Appearance	Non-Asbestos		Asbestos
			% Fibrous	% Non-Fibrous	% Type
3717-10-Sheet Vinyl <i>041829100-0010</i>	Kitchen - Sheet Vinyl	Tan Fibrous Homogeneous	15% Cellulose	65% Non-fibrous (Other)	20% Chrysotile
3717-10-Mastic <i>041829100-0010A</i>	Kitchen - Mastic	Yellow Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
3717-11-Sheet Vinyl <i>041829100-0011</i>	Bathroom - Sheet Vinyl	Brown Fibrous Homogeneous	20% Cellulose	80% Non-fibrous (Other)	None Detected
3717-11-Mastic <i>041829100-0011A</i>	Bathroom - Mastic	Yellow Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
3717-12-Floor Tile <i>041829100-0012</i>	Hallway - Floor Tile	Brown Non-Fibrous Homogeneous		96% Non-fibrous (Other)	4% Chrysotile
3717-12-Mastic <i>041829100-0012A</i>	Hallway - Mastic	Black Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
3717-13 <i>041829100-0013</i>	Above Hallway - Attic Insulation	Yellow Fibrous Homogeneous	90% Min. Wool	10% Non-fibrous (Other)	None Detected
3717-14 <i>041829100-0014</i>	SE Corner Wood Window - Window Glazing	White Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
3717-15 <i>041829100-0015</i>	South End Metal Window - Window Glazing	Tan Non-Fibrous Homogeneous		100% Non-fibrous (Other)	<1% Chrysotile
3717-16 <i>041829100-0016</i>	SW Corner of House - Felt under Wood Siding	Black Fibrous Homogeneous	60% Cellulose	40% Non-fibrous (Other)	None Detected
3717-17 <i>041829100-0017</i>	NW Corner of House - Felt under Wood Siding	Black Fibrous Homogeneous	60% Cellulose	40% Non-fibrous (Other)	None Detected
3717-18 <i>041829100-0018</i>	Roof Duct Work - Duct Sealant	White Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
3717-19 <i>041829100-0019</i>	Roof Duct Work - Duct Sealant	White Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
3717-20-Silver Paint <i>041829100-0020</i>	South End of House - Built up Roofing	Silver Non-Fibrous Homogeneous		97% Non-fibrous (Other)	3% Chrysotile
3717-20-Built Up Roofing <i>041829100-0020A</i>	South End of House - Built up Roofing	Black Fibrous Homogeneous	20% Cellulose	65% Non-fibrous (Other)	15% Chrysotile
3717-20-Tar Paper <i>041829100-0020B</i>	South End of House - Built up Roofing	Black Fibrous Homogeneous	60% Cellulose	40% Non-fibrous (Other)	None Detected
3717-20-Tar <i>041829100-0020C</i>	South End of House - Built up Roofing	Black Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
3717-21-Shingle <i>041829100-0021</i>	North End of House - Built up Roofing	White/Black Fibrous Homogeneous	20% Glass	80% Non-fibrous (Other)	None Detected

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EMSL Analytical, Inc.

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EMSL Order: 041829100
Customer ID: SOUT56
Customer PO:
Project ID:

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

Sample	Description	Appearance	Non-Asbestos		Asbestos
			% Fibrous	% Non-Fibrous	% Type
3717-21-Built Up Roofing <i>041829100-0021A</i>	North End of House - Built up Roofing	Black Fibrous Homogeneous	15% Cellulose	65% Non-fibrous (Other)	20% Chrysotile
3717-21-Tar Paper <i>041829100-0021B</i>	North End of House - Built up Roofing	Black Fibrous Homogeneous	70% Cellulose	30% Non-fibrous (Other)	None Detected
3717-21-Tar <i>041829100-0021C</i>	North End of House - Built up Roofing	Black Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
3717-22 <i>041829100-0022</i>	HVAC Penetration - Roofing Sealant	White/Black Non-Fibrous Homogeneous		95% Non-fibrous (Other)	5% Chrysotile
3717-23 <i>041829100-0023</i>	Plumbing Vent - Roofing Sealant	White/Black Non-Fibrous Homogeneous		92% Non-fibrous (Other)	8% Chrysotile
3717-24 <i>041829100-0024</i>	By Entrance - Mortar	Gray Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
3717-25 <i>041829100-0025</i>	By Entrance - Block	Brown Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
3717-26 <i>041829100-0026</i>	NW Corner of House - Concrete Slab	Gray Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected

Analyst(s)

Amy Johnson (7)

Keishla Vazquez Caraballo (29)

Olufunke Akintunde (5)

Benjamin Ellis, Laboratory Manager
or Other Approved Signatory

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/M-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 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, NIST or any agency of the federal government. EMSL recommends gravimetric reduction for all non-friable organically bound materials prior to analysis. Estimation of uncertainty is available on request.

Samples analyzed by EMSL Analytical, Inc. Cinnaminson, NJ NVLAP Lab Code 101048-0, AIHA-LAP, LLC-IHLAP Lab 100194, NYS ELAP 10872, NJ DEP 03036, PA ID# 68-00367

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

Certificate of Achievement

Asbestos Building Inspector – Refresher

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

Stanley P. Maxam

XXX-XX-8070



Training Date: December 19, 2017

Expiration Date: December 19, 2018

Certificate #: **08820342**

Issue / Exam Date: December 19, 2017

Instructor: Brian Gladhart

A handwritten signature in blue ink, appearing to read 'Brian Gladhart', written over a horizontal line.

Training Director: Carole Benz



8
0
7
0



Solving Environmental Concerns Since 1982
Southwest Hazard Control, Inc.

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

Corporate Headquarters
1953 W. Grant Rd
Tucson, AZ 85745
Phone: 1-(800)-279-5266
Phone: (520)-622-3607
Fax: (520)-622-3643
Email: arizona@swhaz.com

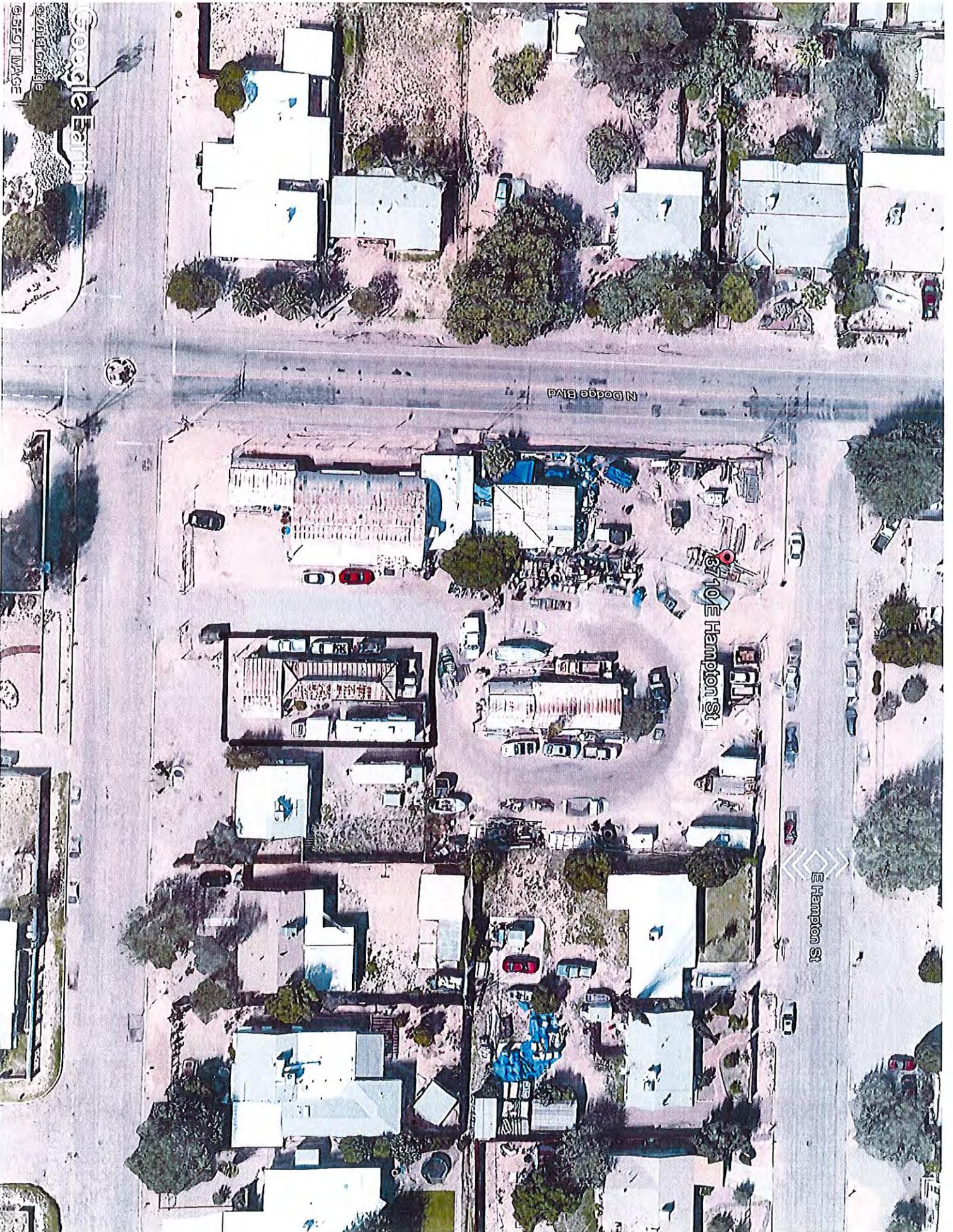
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INSPECTION INFORMATION SHEET

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: 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 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 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, 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 14 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

Area #	Description
1	Deco ceiling texture
2	Drywall / surfacing
3	Cove base mastic
4	Carpet mastic
5	Ceramic tile, thin set & grout
6	Roofing sealant

Table 2 – List of Suspect ACM Homogeneous Areas Sampled/Assumed

Samples shaded and bolded are asbestos containing.

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

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

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

* Assessment Categories

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



Asbestos Chain of Custody
 EMSL Order Number (Lab Use Only):

041829090

RECEIVED
 EMSL
 CINNAMINSON, NJ
 PHONE:
 FAX: 18 SEP 26 AM 10:40

Company Name: Southwest Hazard Control		EMSL Customer ID:	
Street: 1953 W. Grant Road		City: Tucson	State/Province: AZ
Zip/Postal Code: 85745	Country: USA	Telephone #: 520-437-5162	Fax #:
Report To (Name): Stan Maxam		Please Provide Results: <input type="checkbox"/> Fax <input checked="" type="checkbox"/> Email	
Email Address: smaxam@swhaz.com		Purchase Order:	
Project Name/Number: T18651		EMSL Project ID (Internal Use Only):	
U.S. State Samples Taken: AZ		CT Samples: <input type="checkbox"/> Commercial/Taxable <input type="checkbox"/> Residential/Tax Exempt	

EMSL-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* - Please Check

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

*For TEM Air 3 hr through 6 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. Analysis completed in accordance with EMSL's Terms and Conditions located in the Analytical Price Guide.

PCM - Air Check if samples are from NY
 NIOSH 7400
 w/ OSHA 8hr. TWA

PLM - Bulk (reporting limit)
 PLM EPA 600/R-93/116 (<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 (friable in NY)
 NYS 198.6 NOB (non-friable-NY)
 NYS 198.8 SOF-V
 NIOSH 9002 (<1%)

TEM - Air 4-4.5hr TAT (AHERA only)
 AHERA 40 CFR, Part 763
 NIOSH 7402
 EPA Level II
 ISO 10312

TEM - Bulk
 TEM EPA NOB
 NYS NOB 198.4 (non-friable-NY)
 Chatfield SOP
 TEM Mass Analysis-EPA 600 sec. 2.5

TEM - Water: EPA 100.2
 Fibers >10µm Waste Drinking
 All Fiber Sizes Waste Drinking

TEM - Dust
 Microvac - ASTM D 5755
 Wipe - ASTM D6480
 Carpet Sonication (EPA 600/J-93/167)

Soil/Rock/Vermiculite
 PLM EPA 600/R-93/116 with milling prep (<1%)
 PLM EPA 600/R-93/116 with milling prep (<0.25%)
 TEM EPA 600/R-93/116 with milling prep (<0.1%)
 TEM Qualitative via Filtration Prep
 TEM Qualitative via Drop Mount Prep
 Cincinnati Method EPA 600/R-04/004 - PLM/TEM (BC only)

Other:

Check For Positive Stop - Clearly Identify Homogenous Group Filter Pore Size (Air Samples): 0.8µm 0.45µm

Samplers Name: Stan Maxam Samplers Signature: *Stan Maxam*

Sample #	Sample Description	Volume/Area (Air) HA # (Bulk)	Date/Time Sampled
3710-1	Drywall / surfacing Restroom		9/25/18
3710-2	Drywall / surfacing Middle room		
3710-3	Drywall / surfacing North room		
3710-4	Drywall / surfacing Front room		
3710-5	Drywall / surfacing Front room		

Client Sample # (s): - Total # of Samples: 14

Relinquished (Client): *Stan Maxam* Date: 9-25-18 Time: 3:00 p.m.

Received (Lab): *CP* Date: 9-26-18 Time: *9:15*

Comments/Special Instructions:

14



EMSL Analytical, Inc.

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http://www.EMSL.com / cinnasbiab@EMSL.com

EMSL Order: 041829090
Customer ID: SOUT56
Customer PO:
Project ID:

Attention: Stan Maxam
Southwest Hazard Control, Inc.
1953 West Grant Road
Tucson, AZ 85745
Project: T18651
Phone: (520) 622-3607
Fax: (520) 622-3643
Received Date: 09/26/2018 9:30 AM
Analysis Date: 09/27/2018
Collected Date: 09/25/2018

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

Sample	Description	Appearance	Non-Asbestos		Asbestos
			% Fibrous	% Non-Fibrous	% Type
3710-1-Drywall <i>041829090-0001</i>	Restroom - Drywall	Brown/White Fibrous Homogeneous	15% Cellulose 2% Glass	83% Non-fibrous (Other)	None Detected
3710-1-Surfacing <i>041829090-0001A</i>	Restroom - Surfacing	White Non-Fibrous Homogeneous		98% Non-fibrous (Other)	2% Chrysotile
3710-2-Drywall <i>041829090-0002</i>	Middle Room - Drywall	Brown/White Fibrous Homogeneous	15% Cellulose	85% Non-fibrous (Other)	None Detected
3710-2-Surfacing <i>041829090-0002A</i>	Middle Room - Surfacing	White Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
3710-3 <i>041829090-0003</i> <i>No drywall present.</i>	North Room - Surfacing	White Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
3710-4-Drywall <i>041829090-0004</i>	Front Room - Drywall	Brown/White Fibrous Homogeneous	15% Cellulose	85% Non-fibrous (Other)	None Detected
3710-4-Surfacing <i>041829090-0004A</i>	Front Room - Surfacing	White Non-Fibrous Homogeneous		98% Non-fibrous (Other)	2% Chrysotile
3710-5-Drywall <i>041829090-0005</i>	Front Room - Drywall	Brown/White Fibrous Homogeneous	15% Cellulose	85% Non-fibrous (Other)	None Detected
3710-5-Surfacing <i>041829090-0005A</i>	Front Room - Surfacing	White Non-Fibrous Homogeneous		98% Non-fibrous (Other)	2% Chrysotile
3710-6 <i>041829090-0006</i>	Restroom - Deco Ceiling Texture	White Non-Fibrous Homogeneous		95% Non-fibrous (Other)	5% Chrysotile
3710-7 <i>041829090-0007</i>	Middle Room - Deco Ceiling Texture	White Non-Fibrous Homogeneous		98% Non-fibrous (Other)	2% Chrysotile
3710-8 <i>041829090-0008</i>	North Room - Deco Ceiling Texture	White Non-Fibrous Homogeneous		98% Non-fibrous (Other)	2% Chrysotile
3710-9 <i>041829090-0009</i>	North Room - Cove Base Mastic	White Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
3710-10 <i>041829090-0010</i>	Middle Room - Cove Base Mastic	White Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
3710-11 <i>041829090-0011</i>	Front Room - Carpet Mastic	Yellow Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
3710-12-Tile <i>041829090-0012</i>	Restroom - Ceramic Tile	Red Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected

Initial report from: 09/27/2018 13:23:36



EMSL Analytical, Inc.

200 Route 130 North Cinnaminson, NJ 08077
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http://www.EMSL.com / cinnaslab@EMSL.com

EMSL Order: 041829090
Customer ID: SOUT56
Customer PO:
Project ID:

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

Sample	Description	Appearance	Non-Asbestos		Asbestos
			% Fibrous	% Non-Fibrous	% Type
3710-12-Thinset <i>041829090-0012A</i>	Restroom - Thinset	Gray Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
3710-12-Grout <i>041829090-00120</i>	Restroom - Grout	Gray Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
3710-13 <i>041829090-0013</i>	Vent Penetration - Roofing Sealant	Black Fibrous Homogeneous		92% Non-fibrous (Other)	8% Chrysotile
3710-14 <i>041829090-0014</i>	North End of Roof - Roofing Sealant	Black Fibrous Homogeneous		90% Non-fibrous (Other)	10% Chrysotile

Analyst(s)

Adam Gart (16)
Seri Smith (4)


Benjamin Ellis, Laboratory Manager
or Other Approved Signatory

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/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 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, NIST or any agency of the federal government. EMSL recommends gravimetric reduction for all non-friable organically bound materials prior to analysis. Estimation of uncertainty is available on request.

Samples analyzed by EMSL Analytical, Inc Cinnaminson, NJ NVLAP Lab Code 101048-0, AIHA-LAP, LLC-IHLAP Lab 100194, NYS ELAP 10872, NJ DEP 03036, PA ID# 68-00367

Initial report from: 09/27/2018 13:23:36

Certificate of Achievement

Asbestos Building Inspector – Refresher

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

Stanley P. Maxam

XXX-XX-8070



Training Date: December 19, 2017

Expiration Date: December 19, 2018

Certificate #: **08820342**

Issue / Exam Date: December 19, 2017

Instructor: Brian Gladhart

A handwritten signature in blue ink, appearing to read 'Brian Gladhart', is written over a horizontal line.

Training Director: Carole Benz

A handwritten signature in blue ink, appearing to read 'Carole Benz', is written over a horizontal line.



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SHC

Solving Environmental Concerns Since 1982
Southwest Hazard Control, Inc.

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

Corporate Headquarters

1953 W. Grant Rd
Tucson, AZ 85745
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Section 3.0	Tables and Maps <i>Sample Summary</i>
Section 4.0	Asbestos Bulk Laboratory Report <i>Chain of Custodies</i>
Section 5.0	Certification <i>Inspectors Certification</i>



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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: 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 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 AIHERA 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 ACBM sampled

Area #	Description
1	Window glazing
2	Concrete slab
3	Drywall
4	Building caulking
5	Roofing

Table 2 – List of Suspect ACM Homogeneous Areas Sampled/Assumed

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

Sample Number	HA #	Description / Location	Condition	Asbestos	Friable
3701-1	1	Window glazing South window	G	N	N
3701-2	1	Window glazing West window	G	Y	N
3701-3	2	Concrete slab South end	G	N	N
3701-4	2	Concrete slab East end	G	N	N
3701-5	3	Drywall Interior office	G	N	N
3701-6	3	Drywall Interior office	G	N	N
3701-7	4	Caulking On metal exterior panel north	G	N	N
3701-8	1	Roofing Over north shed east end	G	Y	N
3701-9	3	Roofing Over north shed west end	G	N	N

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

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

* Assessment Categories

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



EMSL ANALYTICAL, INC.
LABORATORY PRODUCTS TRADING

Asbestos Chain of Custody

EMSL Order Number (Lab Use Only):

941829088

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PHONE:
18 SEP 26 AM 10:26

Company Name: Southwest Hazard Control		EMSL Customer ID:	
Street: 1953 W. Grant Road		City: Tucson	State/Province: AZ
Zip/Postal Code: 85745	Country: USA	Telephone #: 520-437-5162	Fax #:
Report To (Name): Stan Maxam		Please Provide Results: <input type="checkbox"/> Fax <input checked="" type="checkbox"/> Email	
Email Address: smaxam@swhaz.com		Purchase Order:	
Project Name/Number: T18651		EMSL Project ID (Internal Use Only):	
U.S. State Samples Taken: AZ		CT Samples: <input type="checkbox"/> Commercial/Taxable <input type="checkbox"/> Residential/Tax Exempt	
EMSL-Bill to: <input checked="" type="checkbox"/> Same <input type="checkbox"/> Different - If Bill to is Different note instructions in Comments** Third Party Billing requires written authorization from third party			
Turnaround Time (TAT) Options* - Please Check			
<input type="checkbox"/> 3 Hour	<input type="checkbox"/> 6 Hour	<input checked="" type="checkbox"/> 24 Hour	<input type="checkbox"/> 48 Hour <input type="checkbox"/> 72 Hour <input type="checkbox"/> 96 Hour <input type="checkbox"/> 1 Week <input type="checkbox"/> 2 Week
*For TEM Air 3 hr through 6 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. Analysis completed in accordance with EMSL's Terms and Conditions located in the Analytical Price Guide.			
PCM - Air <input type="checkbox"/> Check if samples are from NY <input type="checkbox"/> NIOSH 7400 <input type="checkbox"/> w/ OSHA 8hr. TWA PLM - Bulk (reporting limit) <input checked="" type="checkbox"/> PLM EPA 600/R-93/116 (<1%) <input type="checkbox"/> PLM EPA NOB (<1%) Point Count <input type="checkbox"/> 400 (<0.25%) <input type="checkbox"/> 1000 (<0.1%) Point Count w/Gravimetric <input type="checkbox"/> 400 (<0.25%) <input type="checkbox"/> 1000 (<0.1%) <input type="checkbox"/> NYS 198.1 (friable in NY) <input type="checkbox"/> NYS 198.6 NOB (non-friable-NY) <input type="checkbox"/> NYS 198.8 SOF-V <input type="checkbox"/> NIOSH 9002 (<1%)	TEM - Air <input type="checkbox"/> 4-4.5hr TAT (AHERA only) <input type="checkbox"/> AHERA 40 CFR, Part 763 <input type="checkbox"/> NIOSH 7402 <input type="checkbox"/> EPA Level II <input type="checkbox"/> ISO 10312 TEM - Bulk <input type="checkbox"/> TEM EPA NOB <input type="checkbox"/> NYS NOB 198.4 (non-friable-NY) <input type="checkbox"/> Chatfield SOP <input type="checkbox"/> TEM Mass Analysis-EPA 600 sec. 2.5 TEM - Water: EPA 100.2 Fibers >10µm <input type="checkbox"/> Waste <input type="checkbox"/> Drinking All Fiber Sizes <input type="checkbox"/> Waste <input type="checkbox"/> Drinking	TEM - Dust <input type="checkbox"/> Microvac - ASTM D 5755 <input type="checkbox"/> Wipe - ASTM D6480 <input type="checkbox"/> Carpet Sonication (EPA 600/J-93/167) Soil/Rock/Vermiculite <input type="checkbox"/> PLM EPA 600/R-93/116 with milling prep (<1%) <input type="checkbox"/> PLM EPA 600/R-93/116 with milling prep (<0.25%) <input type="checkbox"/> TEM EPA 600/R-93/116 with milling prep (<0.1%) <input type="checkbox"/> TEM Qualitative via Filtration Prep <input type="checkbox"/> TEM Qualitative via Drop Mount Prep <input type="checkbox"/> Cincinnati Method EPA 600/R-04/004 - PLM/TEM (BC only) Other: <input type="checkbox"/>	
<input type="checkbox"/> Check For Positive Stop - Clearly Identify Homogenous Group		Filter Pore Size (Air Samples): <input type="checkbox"/> 0.8µm <input type="checkbox"/> 0.45µm	
Samplers Name: Stan Maxam		Samplers Signature: <i>Stan Maxam</i>	
Sample #	Sample Description	Volume/Area (Air) HA # (Bulk)	Date/Time Sampled
3701-1	Window glazing South window		9/25/18
3701-2	Window glazing West window		
3701-3	Concrete slab South end		
3701-4	Concrete slab East end		
3701-5	Drywall Interior office		
Client Sample # (s):		Total # of Samples: 9	
Relinquished (Client): <i>Stan Maxam</i>	Date: 9-25-18	Time: 3:00pm	
Received (Lab): <i>EMSL</i>	Date: 9/26/18	Time: 9:16am	
Comments/Special Instructions:			



EMSL Analytical, Inc.

200 Route 130 North Cinnaminson, NJ 08077
Tel/Fax: (800) 220-3675 / (856) 786-5974
http://www.EMSL.com / cinnaslab@EMSL.com

EMSL Order: 041829088
Customer ID: SOUT56
Customer PO: T18651
Project ID:

Attention: Stan Maxam
Southwest Hazard Control, Inc.
1953 West Grant Road
Tucson, AZ 85745
Phone: (520) 622-3607
Fax: (520) 622-3643
Received Date: 09/26/2018 9:30 AM
Analysis Date: 09/27/2018 - 09/28/2018
Collected Date: 09/25/2018
Project: T18651

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

Sample	Description	Appearance	Non-Asbestos		Asbestos
			% Fibrous	% Non-Fibrous	% Type
3701-1 041829088-0001	South Window - Window Glazing	Gray/White Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
3701-2 041829088-0002	West Window - Window Glazing	Gray Fibrous Homogeneous		98% Non-fibrous (Other)	2% Chrysotile
3701-3 041829088-0003	South End - Concrete Slab	Tan Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
3701-4 041829088-0004	East End - Concrete Slab	Gray Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
3701-5 041829088-0005	Interior Office - Drywall	Brown/White Fibrous Homogeneous	20% Cellulose 4% Glass	76% Non-fibrous (Other)	None Detected
3701-6 041829088-0006	Interior Office - Drywall	Brown/White Fibrous Homogeneous	15% Cellulose 5% Glass	80% Non-fibrous (Other)	None Detected
3701-7 041829088-0007	Metal Panel North End - Caulking	White Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
3701-8-Shingle 041829088-0008	Over North Shed East - Roofing	White/Black Fibrous Homogeneous	25% Glass	75% Non-fibrous (Other)	None Detected
3701-8-Shingle 2 041829088-0008A	Over North Shed East - Roofing	Tan/Black Fibrous Homogeneous	35% Cellulose	65% Non-fibrous (Other)	None Detected
3701-8-Tar Paper 041829088-0008B	Over North Shed East - Roofing	Black Fibrous Homogeneous	70% Cellulose	30% Non-fibrous (Other)	None Detected
3701-8-Flashing 041829088-0008C	Over North Shed East - Roofing	Brown/Black Fibrous Homogeneous	2% Cellulose	83% Non-fibrous (Other)	15% Chrysotile
3701-8-Tar 041829088-0008D	Over North Shed East - Roofing	Black Non-Fibrous Homogeneous	3% Cellulose	97% Non-fibrous (Other)	None Detected
3701-9-Shingle 041829088-0009	Over North Shed West - Roofing	White/Black Fibrous Homogeneous	20% Glass	80% Non-fibrous (Other)	None Detected
3701-9-Tar 041829088-0009A	Over North Shed West - Roofing	Black Fibrous Homogeneous	10% Cellulose	90% Non-fibrous (Other)	None Detected
3701-9-Tar Paper 041829088-0009D	Over North Shed West - Roofing	Black Fibrous Homogeneous	70% Cellulose	30% Non-fibrous (Other)	None Detected

Initial report from: 09/28/2018 00:27:41



EMSL Analytical, Inc.

200 Route 130 North Cinnaminson, NJ 08077
Tel/Fax: (800) 220-3675 / (856) 786-5974
<http://www.EMSL.com> / cinnaslab@EMSL.com

EMSL Order: 041829088
Customer ID: SOUT56
Customer PO: T18651
Project ID:

Analyst(s)

Alexis Kum (6)
Olufunke Akintunde (9)


Benjamin Ells, Laboratory Manager
or Other Approved Signatory

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/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 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, NIST or any agency of the federal government. EMSL recommends gravimetric reduction for all non-friable organically bound materials prior to analysis. Estimation of uncertainty is available on request.

Samples analyzed by EMSL Analytical, Inc. Cinnaminson, NJ NVLAP Lab Code 101048-0, AIHA-LAP, LLC-IHLAP Lab 100194, NYS ELAP 10872, NJ DEP 03036, PA ID# 68-00367

Initial report from: 09/28/2018 00:27:41

Certificate of Achievement

Asbestos Building Inspector – Refresher

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

Stanley P. Maxam

XXX-XX-8070



Training Date: December 19, 2017
Expiration Date: December 19, 2018
Certificate #: **08820342**
Issue / Exam Date: December 19, 2017
Instructor: Brian Gladhart 
Training Director: Carole Benz 



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Solving Environmental Concerns Since 1982
Southwest Hazard Control, Inc.

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

Corporate Headquarters

1953 W. Grant Rd
Tucson, AZ 85745
Phone: 1-(800)-279-5266
Phone: (520)-622-3607
Fax: (520)-622-3643
Email: arizona@swhaz.com

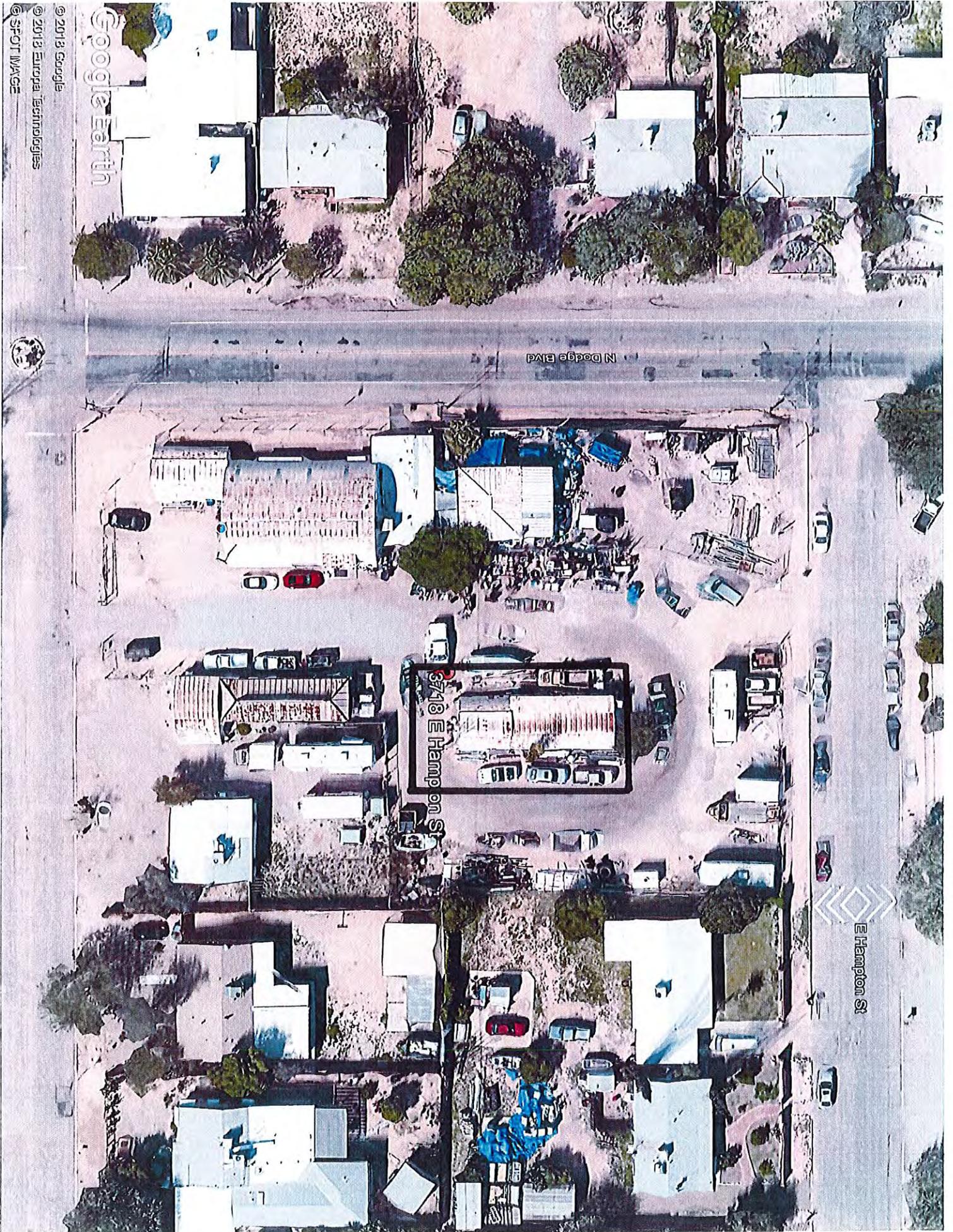
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Section 5.0	Certification <i>Inspectors Certification</i>



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E Hampton St

3718 E Hampton St

N Dodge Blvd

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 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 PCDFEQ, 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 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 2 samples were obtained, with 2 individual layers from 1 homogeneous 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

Area #	Description
1	Concrete slab

Table 2 – List of Suspect ACM Homogeneous Areas Sampled/Assumed

Samples shaded and bolded are asbestos containing.

<i>Sample Number</i>	<i>HA #</i>	<i>Description / Location</i>	<i>Condition</i>	<i>Asbestos</i>	<i>Friable</i>
3718-1	1	Concrete slab West end	G	N	N
3718-2	1	Concrete slab North end	G	N	N



Asbestos Chain of Custody
 EMSL Order Number (Lab Use Only):

041829084

RECEIVED
 EMSL
 CINNAMINSON, NJ
 PHONE
 18 SEP 26 AM 10:40

Company Name : Southwest Hazard Control		EMSL Customer ID:	
Street: 1953 W. Grant Road		City: Tucson	State/Province: AZ
Zip/Postal Code: 85745	Country: USA	Telephone #: 520-437-5162	Fax #:
Report To (Name): Stan Maxam		Please Provide Results: <input type="checkbox"/> Fax <input checked="" type="checkbox"/> Email	
Email Address: smaxam@swhaz.com		Purchase Order:	
Project Name/Number: T18651		EMSL Project ID (Internal Use Only):	
U.S. State Samples Taken: AZ		CT Samples: <input type="checkbox"/> Commercial/Taxable <input type="checkbox"/> Residential/Tax Exempt	
EMSL-Bill to: <input checked="" type="checkbox"/> Same <input type="checkbox"/> Different - If Bill to is Different note instructions in Comments** Third Party Billing requires written authorization from third party			
Turnaround Time (TAT) Options* - Please Check			
<input type="checkbox"/> 3 Hour <input type="checkbox"/> 6 Hour <input checked="" type="checkbox"/> 24 Hour <input type="checkbox"/> 48 Hour <input type="checkbox"/> 72 Hour <input type="checkbox"/> 96 Hour <input type="checkbox"/> 1 Week <input type="checkbox"/> 2 Week			
*For TEM Air 3 hr through 6 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. Analysis completed in accordance with EMSL's Terms and Conditions located in the Analytical Price Guide.			
PCM - Air <input type="checkbox"/> Check if samples are from NY <input type="checkbox"/> NIOSH 7400 <input type="checkbox"/> w/ OSHA 8hr. TWA		TEM - Air <input type="checkbox"/> 4-4.5hr TAT (AHERA only) <input type="checkbox"/> AHERA 40 CFR, Part 763 <input type="checkbox"/> NIOSH 7402 <input type="checkbox"/> EPA Level II <input type="checkbox"/> ISO 10312	
PLM - Bulk (reporting limit) <input checked="" type="checkbox"/> PLM EPA 600/R-93/116 (<1%) <input type="checkbox"/> PLM EPA NOB (<1%) Point Count <input type="checkbox"/> 400 (<0.25%) <input type="checkbox"/> 1000 (<0.1%) Point Count w/Gravimetric <input type="checkbox"/> 400 (<0.25%) <input type="checkbox"/> 1000 (<0.1%) <input type="checkbox"/> NYS 198.1 (friable in NY) <input type="checkbox"/> NYS 198.6 NOB (non-friable-NY) <input type="checkbox"/> NYS 198.8 SOF-V <input type="checkbox"/> NIOSH 9002 (<1%)		TEM - Bulk <input type="checkbox"/> TEM EPA NOB <input type="checkbox"/> NYS NOB 198.4 (non-friable-NY) <input type="checkbox"/> Chatfield SOP <input type="checkbox"/> TEM Mass Analysis-EPA 600 sec. 2.5 TEM - Water: EPA 100.2 Fibers >10µm <input type="checkbox"/> Waste <input type="checkbox"/> Drinking All Fiber Sizes <input type="checkbox"/> Waste <input type="checkbox"/> Drinking	
<input type="checkbox"/> Microvac - ASTM D 5755 <input type="checkbox"/> Wipe - ASTM D6480 <input type="checkbox"/> Carpet Sonication (EPA 600/J-93/167)		Soil/Rock/Vermiculite <input type="checkbox"/> PLM EPA 600/R-93/116 with milling prep (<1%) <input type="checkbox"/> PLM EPA 600/R-93/116 with milling prep (<0.25%) <input type="checkbox"/> TEM EPA 600/R-93/116 with milling prep (<0.1%) <input type="checkbox"/> TEM Qualitative via Filtration Prep <input type="checkbox"/> TEM Qualitative via Drop Mount Prep <input type="checkbox"/> Cincinnati Method EPA 600/R-04/004 - PLM/TEM (BC only)	
<input type="checkbox"/> Check For Positive Stop - Clearly Identify Homogenous Group		Filter Pore Size (Air Samples): <input type="checkbox"/> 0.8µm <input type="checkbox"/> 0.45µm	
Samplers Name: Stan Maxam		Samplers Signature: <i>Stan Maxam</i>	
Sample #	Sample Description	Volume/Area (Air) HA # (Bulk)	Date/Time Sampled
3718-1	Concrete slab West end		9/25/18
3718-2	Concrete slab North end		
Client Sample # (s):		Total # of Samples: 2	
Relinquished (Client): <i>Stan Maxam</i>	Date: 9-25-18	Time: 3:00 p.m.	
Received (Lab): <i>UIS</i>	Date: 9-26-18	Time: 9:00 a.m.	
Comments/Special Instructions:			

2



EMSL Analytical, Inc.

200 Route 130 North Cinnaminson, NJ 08077

Tel/Fax: (800) 220-3675 / (856) 786-5974

<http://www.EMSL.com> / cinnaslab@EMSL.com

EMSL Order: 041829084

Customer ID: SOUT56

Customer PO:

Project ID:

Attention: Stan Maxam
Southwest Hazard Control, Inc.
1953 West Grant Road
Tucson, AZ 85745

Phone: (520) 622-3607

Fax: (520) 622-3643

Received Date: 09/26/2018 9:30 AM

Analysis Date: 09/26/2018 - 09/27/2018

Collected Date: 09/25/2018

Project: T18651

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

Sample	Description	Appearance	Non-Asbestos		Asbestos
			% Fibrous	% Non-Fibrous	% Type
3718-01	West End - Concrete Slab	Gray Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
041829084-0001					
3718-02	North End - Concrete Slab	Brown/Gray Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
041829084-0002					

Analyst(s)

Alexis Kum (1)

Natalia Dispensa (1)

Benjamin Ellis, Laboratory Manager
or Other Approved Signatory

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/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 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, NIST or any agency of the federal government. EMSL recommends gravimetric reduction for all non-friable organically bound materials prior to analysis. Estimation of uncertainty is available on request.

Samples analyzed by EMSL Analytical, Inc. Cinnaminson, NJ NVLAP Lab Code 101048-0, AIHA-LAP, LLC-IHLAP Lab 100194, NYS ELAP 10872, NJ DEP 03036, PA ID# 68-00367

Initial report from: 09/27/2018 07:43:08

Certificate of Achievement

Asbestos Building Inspector – Refresher

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

Stanley P. Maxam

XXX-XX-8070



Training Date: December 19, 2017
Expiration Date: December 19, 2018
Certificate #: **08820342**
Issue / Exam Date: December 19, 2017
Instructor: Brian Gladhart 
Training Director: Carole Benz 



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*Solving Environmental Concerns Since 1982
Southwest Hazard Control, Inc.*

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

Corporate Headquarters
1953 W. Grant Rd
Tucson, AZ 85745
Phone: 1-(800)-279-5266
Phone: (520)-622-3607
Fax: (520)-622-3643
Email: arizona@swhaz.com

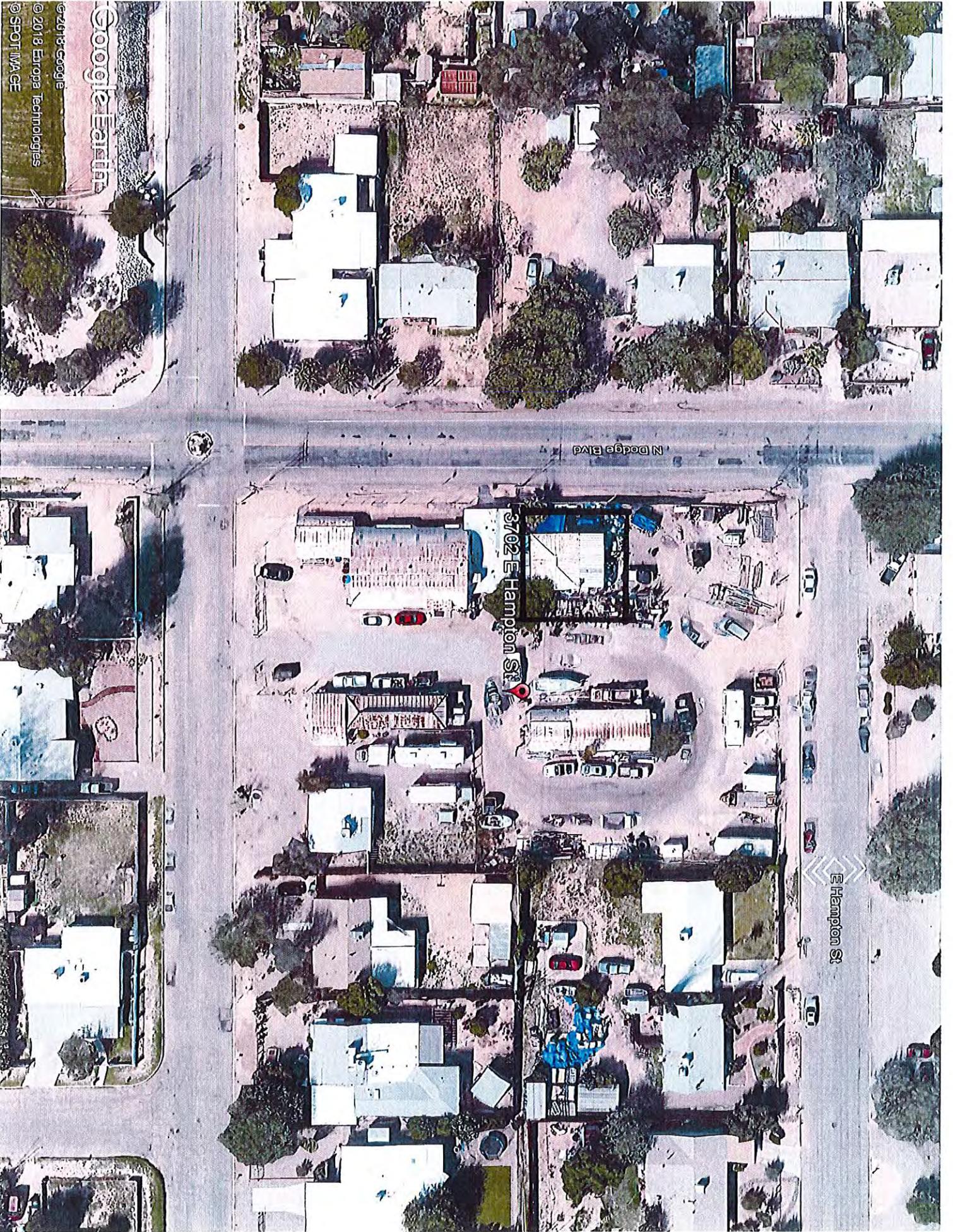
2416 W. Campus Drive
Tempe, AZ 85282
Phone: 1-(866)-794-9040
Phone: (480)-517-9040
Fax: (480)-517-9140
Email: phoenix@swhaz.com

9112 Susan Ave S.E.
Albuquerque, NM 87123
Phone: 1-(800)-279-5268
Phone: (505)-298-6930
Fax: (505)-298-7142
Email: albuquerque@swhaz.com

712 Whitney Street
San Leandro, CA 94577
Phone: 1-(800)-326-8558
Phone: (510)-352-5152
Fax: (510)-352-5155
Email: california@swhaz.com

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Section 2.0	Main Inspection Report
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2.2	<i>Scope of Services</i>
2.3	<i>Site Information</i>
2.4	<i>Survey of Methodology</i>
2.5	<i>Description of Sampling and Testing</i>
2.6	<i>Sample Summary</i>
2.7	<i>Analysis of Bulk Samples</i>
2.8	<i>Conclusion</i>
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Section 4.0	Asbestos Bulk Laboratory Report <i>Chain of Custodies</i>
Section 5.0	Certification <i>Inspectors Certification</i>



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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: 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 NESIAP 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 Material:

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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 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

Area #	Description
1	Concrete slab

Table 2 – List of Suspect ACM Homogeneous Areas Sampled/Assumed

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

Sample Number	HA #	Description / Location	Condition	Asbestos	Friable
3702-1	1	Concrete slab East end	G	N	N
3702-2	1	Concrete slab Northwest corner	G	N	N



Asbestos Chain of Custody
 EMSL Order Number (Lab Use Only):

041829109

RECEIVED
 EMSL
 CINNAMINSON, NJ
 PHONE:
 18 SEP 26 AM 10:25

Company Name : Southwest Hazard Control		EMSL Customer ID:	
Street: 1953 W. Grant Road		City: Tucson	State/Province: AZ
Zip/Postal Code: 85745	Country: USA	Telephone #: 520-437-5162	Fax #:
Report To (Name): Stan Maxam		Please Provide Results: <input type="checkbox"/> Fax <input checked="" type="checkbox"/> Email	
Email Address: smaxam@swhaz.com		Purchase Order:	
Project Name/Number: T18651		EMSL Project ID (Internal Use Only):	
U.S. State Samples Taken: AZ		CT Samples: <input type="checkbox"/> Commercial/Taxable <input type="checkbox"/> Residential/Tax Exempt	
EMSL-Bill to: <input checked="" type="checkbox"/> Same <input type="checkbox"/> Different - If Bill to is Different note instructions in Comments* <small>Third Party Billing requires written authorization from third party</small>			
Turnaround Time (TAT) Options* - Please Check			
<input type="checkbox"/> 3 Hour	<input type="checkbox"/> 6 Hour	<input checked="" type="checkbox"/> 24 Hour	<input type="checkbox"/> 48 Hour <input type="checkbox"/> 72 Hour <input type="checkbox"/> 96 Hour <input type="checkbox"/> 1 Week <input type="checkbox"/> 2 Week
<small>*For TEM Air 3 hr through 6 hr, please call ahead to schedule. *There is a premium charge for 3 Hour TEM AHERA or EPA Level III TAT. You will be asked to sign an authorization form for this service. Analysis completed in accordance with EMSL's Terms and Conditions located in the Analytical Price Guide.</small>			
PCM - Air <input type="checkbox"/> Check if samples are from NY <input type="checkbox"/> NIOSH 7400 <input type="checkbox"/> w/ OSHA 8hr. TWA		TEM - Air <input type="checkbox"/> 4-4.5hr TAT (AHERA only) <input type="checkbox"/> AHERA 40 CFR, Part 763 <input type="checkbox"/> NIOSH 7402 <input type="checkbox"/> EPA Level II <input type="checkbox"/> ISO 10312	
PLM - Bulk (reporting limit) <input checked="" type="checkbox"/> PLM EPA 600/R-93/116 (<1%) <input type="checkbox"/> PLM EPA NOB (<1%) Point Count <input type="checkbox"/> 400 (<0.25%) <input type="checkbox"/> 1000 (<0.1%) Point Count w/Gravimetric <input type="checkbox"/> 400 (<0.25%) <input type="checkbox"/> 1000 (<0.1%) <input type="checkbox"/> NYS 198.1 (friable in NY) <input type="checkbox"/> NYS 198.6 NOB (non-friable-NY) <input type="checkbox"/> NYS 198.8 SOF-V <input type="checkbox"/> NIOSH 9002 (<1%)		TEM - Bulk <input type="checkbox"/> TEM EPA NOB <input type="checkbox"/> NYS NOB 198.4 (non-friable-NY) <input type="checkbox"/> Chatfield SOP <input type="checkbox"/> TEM Mass Analysis-EPA 600 sec. 2.5 TEM - Water: EPA 100.2 Fibers >10µm <input type="checkbox"/> Waste <input type="checkbox"/> Drinking All Fiber Sizes <input type="checkbox"/> Waste <input type="checkbox"/> Drinking	
TEM - Dust <input type="checkbox"/> Microvac - ASTM D 5755 <input type="checkbox"/> Wipe - ASTM D6480 <input type="checkbox"/> Carpet Sonication (EPA 600/J-93/167)		Soil/Rock/Vermiculite <input type="checkbox"/> PLM EPA 600/R-93/116 with milling prep (<1%) <input type="checkbox"/> PLM EPA 600/R-93/116 with milling prep (<0.25%) <input type="checkbox"/> TEM EPA 600/R-93/116 with milling prep (<0.1%) <input type="checkbox"/> TEM Qualitative via Filtration Prep <input type="checkbox"/> TEM Qualitative via Drop Mount Prep <input type="checkbox"/> Cincinnati Method EPA 600/R-04/004 - PLM/TEM (BC only)	
<input type="checkbox"/> Check For Positive Stop - Clearly Identify Homogenous Group		Filter Pore Size (Air Samples): <input type="checkbox"/> 0.8µm <input type="checkbox"/> 0.45µm	
Samplers Name: Stan Maxam		Samplers Signature: <i>Stan Maxam</i>	
Sample #	Sample Description	Volume/Area (Air) HA # (Bulk)	Date/Time Sampled
3702-1	Concrete slab East end		9/25/18
3702-2	Concrete slab Northwest corner		
Client Sample # (s):		Total # of Samples: 2	
Relinquished (Client): <i>Stan Maxam</i>	Date: 9-25-18	Time: 3:00 PM	
Received (Lab): <i>EMSL</i>	Date: 9-26-18	Time: 9:12a	
Comments/Special Instructions:			

2



EMSL Analytical, Inc.

200 Route 130 North Cinnaminson, NJ 08077
Tel/Fax: (800) 220-3675 / (856) 786-5974
[http://www.EMSL.com / cinnasblab@EMSL.com](http://www.EMSL.com/cinnasblab@EMSL.com)

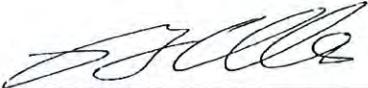
EMSL Order: 041829109
Customer ID: SOUT56
Customer PO:
Project ID:

Attention: Stan Maxam
Southwest Hazard Control, Inc.
1953 West Grant Road
Tucson, AZ 85745
Project: T18651
Phone: (520) 622-3607
Fax: (520) 622-3643
Received Date: 09/26/2018 9:30 AM
Analysis Date: 09/26/2018
Collected Date: 09/25/2018

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

Sample	Description	Appearance	Non-Asbestos		Asbestos
			% Fibrous	% Non-Fibrous	% Type
3702-1 <i>041829109-0001</i>	East End - Concrete Slab	Tan Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
3702-2 <i>041829109-0002</i>	Northwest Corner - Concrete Slab	Gray Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected

Analyst(s)
Natalia Dispensa (2)


Benjamin Ellis, Laboratory Manager
or Other Approved Signatory

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/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 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, NIST or any agency of the federal government. EMSL recommends gravimetric reduction for all non-friable organically bound materials prior to analysis. Estimation of uncertainty is available on request.
Samples analyzed by EMSL Analytical, Inc. Cinnaminson, NJ NVLAP Lab Code 101048-0, AIHA-LAP, LLC-IHLAP Lab 100194, NYS ELAP 10872, NJ DEP 03036, PA ID# 68-00367

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

Certificate of Achievement

Asbestos Building Inspector – Refresher

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

Stanley P. Maxam

XXX-XX-8070



Training Date: December 19, 2017

Expiration Date: December 19, 2018

Certificate #: 08820342

Issue / Exam Date: December 19, 2017

Instructor: Brian Gladhart

A handwritten signature in blue ink, appearing to read 'Brian Gladhart', is written over a horizontal line.

Training Director: Carole Benz

A handwritten signature in blue ink, appearing to read 'Carole Benz', is written over a horizontal line.



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ATTACHMENT 3

Hickey & Sons Parcel
Phase I Environmental Site Assessment Report, August 9, 2018
Observations, Database Information and Recommendations

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.

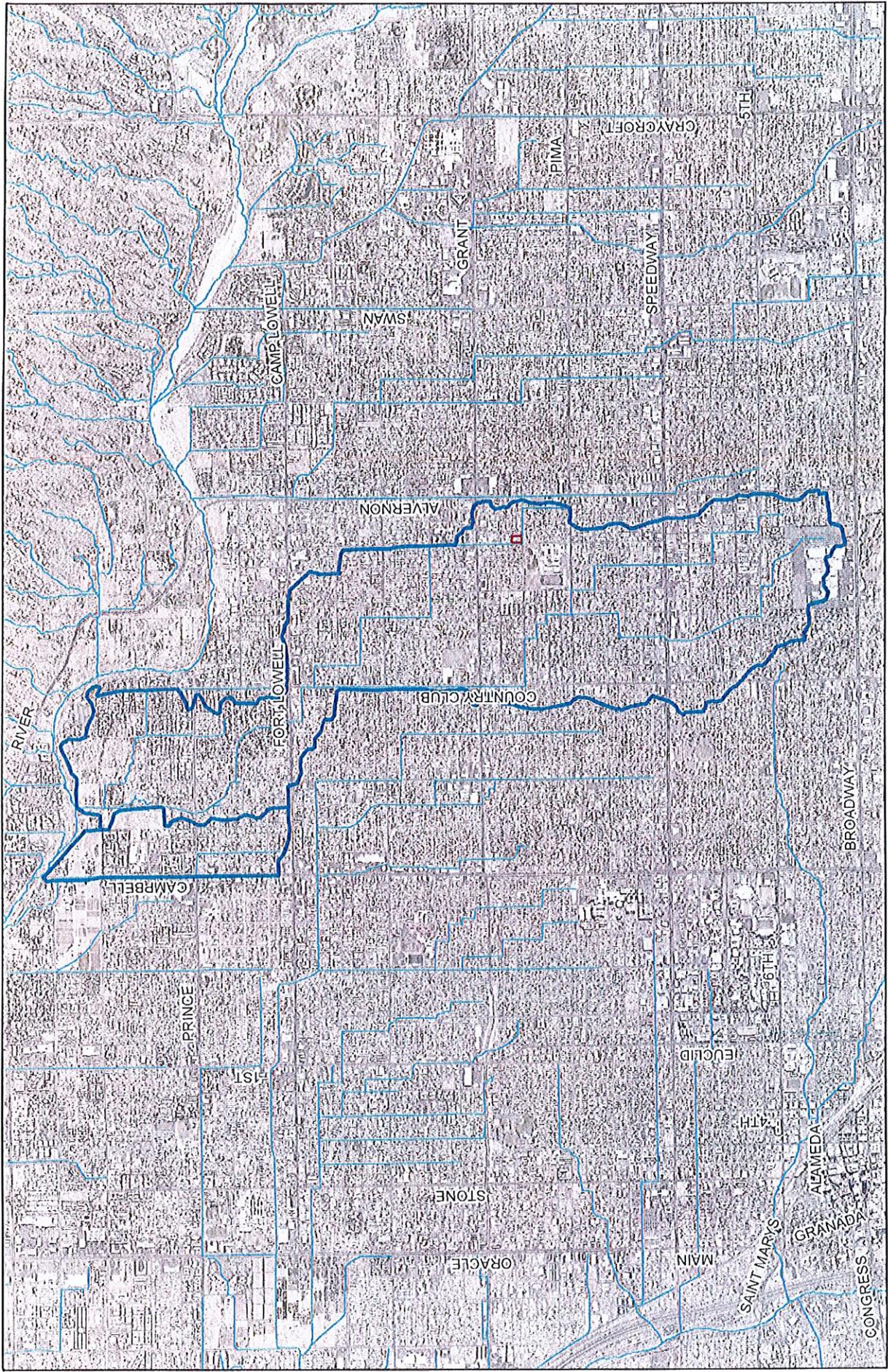
Observations and Recommendations

- 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.

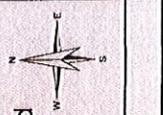
ATTACHMENT 4



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The information depicted on this display is the result of digital analyses performed on a variety of databases. The accuracy of the information presented is limited to the collective accuracy of these databases on the date of the analyses. No warranty is made regarding the accuracy of the information depicted hereon.

This product is subject to the GIS Desktop Disclaimer and Use Restrictions.



- Christmas Wash Watershed
- Parcel 122-16-171A
- Washes

1 inch = 3,721 feet

Date: 12/10/2018

Exhibit B Christmas Wash Watershed

PIMA COUNTY
FLOOD CONTROL

Pima County Regional Flood Control District
201 N. Stone Ave. - 9th Floor
65207-2440 • FAX: (520) 774-4421
<http://www.pima.gov>



The information depicted on this display is the result of a process that has been automated. The information provided and maintained by several governmental agencies. The accuracy of the information presented is limited to the collective accuracy of these databases on the date of the last update. The Pima County Flood Control District makes no claims regarding the accuracy of the information depicted herein.

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-  Washes
-  Parcel 122-16-171A
-  Parcel Lines

Exhibit A - Parcel 122-16-171A

Date: 12/10/2018

1 inch = 75 feet

PIMA COUNTY
 FLOOD CONTROL
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