



CITADEL ENVIRONMENTAL SERVICES, INC.

assess
resolve
strengthen

November 27, 2013

Michael R. Merino
Architect

VA SAN DIEGO HEALTHCARE SYSTEM

3350 La Jolla Village Drive, MC 138
San Diego, CA 92161

**Re: CITADEL Project No. 5137.1147.0
Limited Asbestos Bulk Sampling Summary Letter
BN-Remodel Logistics Swing Space
3350 La Jolla Village Drive
San Diego, California 92161**

Dear Mr. Merino:

Citadel Environmental Services, Inc. (Citadel) was contracted by VA San Diego Healthcare System (Client) to perform limited asbestos bulk sampling at the property located at 3350 La Jolla Village Drive (Site) in San Diego, California herein referred to as the Project Site.

Citadel's scope of work included the following: 1) collecting bulk samples of suspect-asbestos containing materials (ACMs) limited to the BN-Remodel Logistics Swing Stage Space project area (Survey Area); 2) submitting the samples to an independent and accredited laboratory for analysis; and 3) preparing a report which includes our findings and recommendations.

The bulk sampling was conducted on November 13, 2013 by Citadel's Senior Industrial Hygienist, Mr. Chris Roberts, a California Certified Asbestos Consultant (CAC #08-4450). The report was written by Mr. Roberts and reviewed by Michelle Campbell, Director of Building Sciences and Industrial Hygiene. Ms. Campbell is a Certified Asbestos Consultant (CAC #09-4519). Citadel's personnel certification can be found under Appendix A.

METHODOLOGY

At the time of Citadel's limited bulk sampling, the survey areas at the Project Site were tested in conjunction with the BN-Remodel Logistics Swing Stage Space Project and a mutually agreed upon scope of work.

Citadel collected a total of seven (7) representative bulk asbestos samples. The samples were analyzed by LA Testing, a NVLAP-accredited laboratory (NVLAP #200232-0) located in Garden Grove, California. The sample analysis was performed by EPA 600/R-93/116. The EPA method is a semi-quantitative procedure with a detection limit of one-tenth to one percent (0.10 – 1.0%) by area, dependent upon the material being analyzed. LA Testing analytical asbestos laboratory reports may be found in Appendix B.

All bulk samples collected for asbestos determination were analyzed by Polarized Light Microscopy (PLM) utilizing dispersion staining techniques in accordance with the EPA Method: "Method for the Determination of Asbestos in Bulk Building Materials U.S. EPA/600/R-93/116" dated July 1993, and adopted by the National Voluntary Laboratory Accreditation Program (NVLAP), NVLAP Test Method Code 18/A01, as affiliated with the National Institute for Standards and Technology (NIST). If noted, positive samples were analyzed by Polarized Light Microscopy (PLM) 1000 Point Count Method.

A detailed summary of bulk samples collected is attached along with the laboratory analytical report.

FINDINGS

The EPA's Asbestos National Emissions Standard for Hazardous Air Pollutants (NESHAPs; 40 CFR 61, Subpart M) and the San Diego County Air Pollution Control District (SDAPCD), the local air pollution control district, define an asbestos-containing material as any material that contains a concentration of asbestos of greater than one percent (>1.0%) by area as determined by Polarized Light Microscopy (PLM). NESHAP segregates asbestos-containing materials into *Regulated Asbestos-Containing Materials (RACM)*, *Category I Non-Friable Materials*, and *Category II Non-Friable Materials*¹.

The Federal Occupational Safety and Health Administration (OSHA 29 CFR 1926.1101 and 29 CFR 1910.1001) defines an ACM as any material that contains concentrations of asbestos of greater than one percent (>1.0%) by area as determined by PLM. The California Department of Occupational Safety and Health (Cal/OSHA) further defines an asbestos-containing construction material (ACCM) as a material that contains greater than one-tenth of one percent (>0.1%) asbestos

Asbestos was reported to be present in quantities of greater than one percent (>1.0%) (ACM) in representative bulk samples of the following materials collected during this survey:

- Sprayed fireproofing on structural beams (B177J Storage)
- Sprayed fireproofing on metal decking at ceiling level (B177K Storage)
- Sprayed fireproofing on structural beams (B177L Storage)

Representative bulk samples of the following materials were reported to contain no detectable quantities of asbestos:

- Insulation on HVAC duct (B177J Storage)
- Thermal System Insulation on pipes at ceiling level (B177J)
- Thermal System Insulation on pipes at ceiling level (B177K)
- Thermal System Insulation on pipes at ceiling level (B177L)

A drawing and photo log depicting bulk sample locations may be found in Appendix C.

¹ Regulated Asbestos-Containing Materials (RACM) includes all friable asbestos materials, Category I Non-friable ACM that has become friable or will become friable, and Category II Non-friable ACM that have a high probability of being crumbled, pulverized, or reduced to powder by the forces expected to act on the materials in the course of renovation or demolition. Category I Non friable ACM includes asbestos-containing packings, gaskets, resilient floor covering, and asphalt roofing products that when dry can be crumbled, pulverized, or reduced to powder by hand pressure. Category II Non-friable ACM includes all non-friable materials, excluding Category I Non-friable ACM that when dry cannot be crumbled, pulverized, or reduced to powder by hand pressure.

RECOMMENDATIONS AND CONCLUSIONS

The results of the survey indicate that ACMs are present in the survey area (BN-Remodel Logistics Swing Space) at the Project Site. Citadel's scope of work and testing of representative areas was limited to accessible building materials specifically identified as being impacted by the proposed work to be performed. Areas outside of the specific areas identified in this scope of work were not included as part of this investigation.

All asbestos removal operations shall be performed by a Cal/OSHA-DOSH-registered and California-licensed asbestos contractor. All disturbances of ACMs, and/or abatement operations, should be performed under the surveillance of a third-party Cal/OSHA Certified Asbestos Consultant retained by the Client.

All disturbances of ACMs, and/or abatement operations, must be performed in accordance with the Cal/OSHA requirements set forth in 8 CCR 1529. Given the location of the subject facility, all asbestos abatement must also be performed in accordance with the SDAPCD requirements.

Finally, notification of the presence and location of ACMs shall be made to all employees and vendors to work within the subject structure, in accordance with California Health and Safety Code, Section 25915, et seq. (also known as Connelly Notification Bills).

Citadel recommends that all undamaged ACMs, ACCMs, and PACMs not to be disturbed as part of this project and scheduled to remain be managed in place in accordance with the EPA's guidance document Managing Asbestos In-Place (a.k.a., the Green Book). The Green Book can be obtained by calling the Toxic Substance Control Act Hotline at (202) 554-1404. Citadel also recommends that the materials be managed in place in accordance with the Client's Operations and Maintenance (O & M program) addressing building cleaning, maintenance, renovation, and general operation procedures to minimize exposure to asbestos.

This report has been prepared by Citadel Environmental Services, Inc. exclusively for our Client and their Authorized Representatives. The information contained herein pertains only to accessible materials identified at the referenced property at the time of the survey performed in accordance with a mutually agreed upon scope of work. The findings and recommendations presented are based upon observations of present conditions, and may not necessarily indicate future conditions. Citadel Environmental Services, Inc. implies no warranty to the accuracy of information provided them by outside agents and transmitted herein. The information contained herein may not be used, disclosed, or copied without written permission of the Client.

Report Prepared By:

Chris Roberts
Senior Industrial Hygienist
Certified Asbestos Consultant No. 08-4450

Report Reviewed By:

Michelle Campbell, CMC, CAC
Certified Asbestos Consultant No. 09-4519

Attachments (Appendices A through C)



CITADEL
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Appendix A

Team Certifications

DEPARTMENT OF INDUSTRIAL RELATIONS

Division of Occupational Safety and Health

Asbestos Unit

2424 Arden Way, Suite 495

Sacramento, CA 95825-2417

(916) 574-2993 Office (916) 483-0572 Fax

<http://www.dir.ca.gov/dirdatabases.html>actu@dir.ca.gov

810304450C

320

October 07, 2013

Christopher J Roberts**5730 Sugar Pine Drive****Yorba Linda****' CA 92886**

Dear Certified Asbestos Consultant or Technician:

Enclosed is your certification card. **To maintain your certification, you must abide by the rules printed on the back of the certification card.**

Your certification is valid for a period of one year. If you wish to renew your certification, you must apply for renewal at least 60 days before the expiration date shown on your card. [8 CCR 341.15(h)(1)].

Please hold and do not send copies of your required AHERA refresher renewal certificates to our office until you apply for renewal of your certification.

Certificates must be kept current if you are actively working as a CAC or CSST. The grace period is only for those who are not actively working as an asbestos consultant or site surveillance technician.

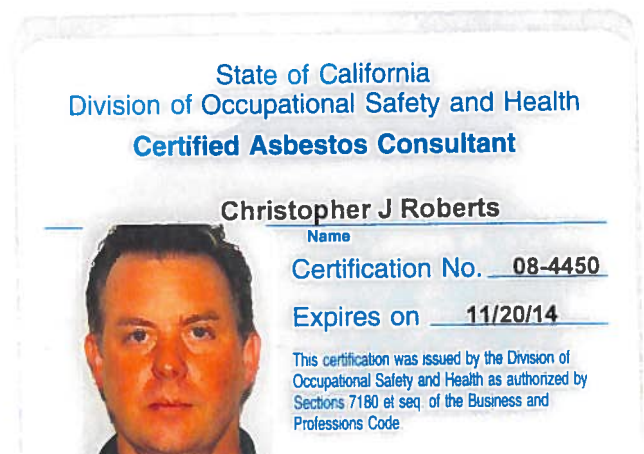
Please contact our office at the above address, fax number or email; of any changes in your contact/mailling information within 15 days of the change.

Sincerely,

Jeff Ferrell
Senior Safety Engineer

Attachment: Certification Card

cc: File



Renewal - Card Attached (Revised 10/24/2012)

DEPARTMENT OF INDUSTRIAL RELATIONS

Division of Occupational Safety and Health

Asbestos Unit

2424 Arden Way, Suite 485

Sacramento, CA 95825-2417

(916) 574-2993 Office (916) 483-0572 Fax

<http://www.dir.ca.gov/dirdatabases.html>actu@dir.ca.gov

904234519C

326

Citadel Environmental Services, Inc.

Michelle L Campbell

151 Kalmus Drive, #F-4

Costa Mesa

, CA 92626

May 09, 2013

Dear Certified Asbestos Consultant or Technician:

Enclosed is your certification card. **To maintain your certification, you must abide by the rules printed on the back of the certification card.**

Your certification is valid for a period of one year. If you wish to renew your certification, you must apply for renewal at least 60 days before the expiration date shown on your card. [8 CCR 341.15(h)(1)].

Please hold and do not send copies of your required AHERA refresher renewal certificates to our office until you apply for renewal of your certification.

Certificates must be kept current if you are actively working as a CAC or CSST. The grace period is only for those who are not actively working as an asbestos consultant or site surveillance technician.

Please contact our office at the above address, fax number or email; of any changes in your contact/mailling information within 15 days of the change.

Sincerely,

Jeff Ferrell

Senior Safety Engineer

Attachment: Certification Card

cc: File

Renewal – Card Attached (Revised 01/03/2012)

State of California
Division of Occupational Safety and Health
Certified Asbestos Consultant

Michelle L Campbell

Name

Certification No. **09-4519**Expires on **05/21/14**

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



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Appendix B

Asbestos Lab Report



LA Testing

11652 Knott Street Unit F5, Garden Grove, CA 92841

Phone/Fax: (714) 828-4999 / (714) 828-4944

<http://www.LATesting.com>

gardengrovelab@latesting.com

LA Testing Order: 331317587

CustomerID: 32CITA50D

CustomerPO:

ProjectID:

Attn: **Chris Roberts**
Citadel Environmental Services
151 Kalmus Drive
Suite F-4
Costa Mesa, CA 92626

Phone: (714) 547-4301
Fax: (714) 547-4647
Received: 11/18/13 8:00 AM
Analysis Date: 11/22/2013
Collected:

Project: 5137.1147.0 / Logistics Swing Space

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	
001 331317587-0001		Brown/Yellow Fibrous Heterogeneous	45% Cellulose 45% Glass	10% Non-fibrous (other)		None Detected
002 331317587-0002		Beige Non-Fibrous Homogeneous		95% Non-fibrous (other)		5% Chrysotile
003 331317587-0003		Gray Non-Fibrous Homogeneous		96% Non-fibrous (other)		4% Chrysotile
004 331317587-0004		Gray Non-Fibrous Homogeneous		95% Non-fibrous (other)		5% Chrysotile
005 331317587-0005		Yellow Fibrous Homogeneous	90% Glass	10% Non-fibrous (other)		None Detected
006 331317587-0006		Yellow Fibrous Homogeneous	80% Glass	20% Non-fibrous (other)		None Detected
007 331317587-0007		Tan Fibrous Homogeneous	85% Glass	15% Non-fibrous (other)		None Detected

Analyst(s)

Christopher Kim (7)

Michael DeCavallas, Laboratory Manager
or other approved signatory

EMSL maintains liability limited to cost of analysis. This report relates only to the samples reported 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. 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. Non-friable organically bound materials present a problem matrix and therefore EMSL recommends gravimetric reduction prior to analysis. Samples received in good condition unless otherwise noted. Estimated accuracy, precision and uncertainty data available upon request. Unless requested by the client, building materials manufactured with multiple layers (i.e. linoleum, wallboard, etc.) are reported as a single sample. Reporting limit is 1%

Samples analyzed by LA Testing Garden Grove, CA NVLAP Lab Code 101384-0, CA ELAP 1406

Initial report from 11/22/2013 16:44:35

#331317587

CHAIN OF CUSTODY

CITADEL LOCATION:

☐ GLENDALE

Contact: _____
 email: _____
 425 East Colorado Blvd, Suite 560
 Glendale, CA 91205
 Phone: (818) 246-2707
 Fax: (818) 246-3145

☒ ORANGE COUNTY

Contact: CHRIS ROBERTS
 email: croberts@citadel.com
 400 North Tustin Avenue, Suite 340
 Santa Ana, CA 92705
 Phone: (714) 547-4301
 Fax: (714) 547-4647

☐ DTLA

Contact: _____
 email: _____
 333 South Beaudry Avenue
 Los Angeles, CA 90017
 Phone: (213) 241-1234
 Fax: (213) 241-6843

☐ TORRANCE OFFICE

Contact: _____
 email: _____
 3700 West 190th Street
 Torrance, CA 90509
 Phone: (310) 212-1714
 Fax: (310) 212-1702

PROJECT AND SAMPLE INFORMATION

PROJECT NUMBER: 5137 1147 &PROJECT ID: LOGISTICS SWINK SPACENUMBER OF SAMPLES: 7SAMPLE NUMBERS: 001-007

TYPE OF SAMPLES (CIRCLE ONE):

AIR

TAPE

WATER

WIPE

BULK

SOIL

ZEFON

ANDERSEN

AIR-O-CELL

PLATE

OTHER

TYPE OF ANALYSIS:

Asbestos

☒ Phase Contrast Microscopy☒ Polarized Light Microscopy☐ 1st Positive Stop☐ Point Count☐ 400 Point Count☐ 1000 Point Count☐ Transmission Electron Microscopy☐ Qualitative☐ Quantitative

Culturable Air

☐ Andersen Fungi (genue ID, Aspergillus)☐ Andersen Bacteria

Non-Culturable Air

☐ Non-Viable Spore Trap Slide

Surface Samples

☐ Surface Sample (direct examination)

Lead

☐ Flame Atomic Absorption☐ TTLC☐ STLC☐ TCLP

Culturable Samples

☐ Quantitative Fungi-dust, bulk swab-1 medium☐ Quantitative Fungi-dust, bulk swab-3 media☐ Quantitative Bacteria-dust, bulk swab-1 medium☐ Quantitative Bacteria-dust, bulk, swab-3 media☐ E. coli and Coliforms (MUG)

Other

TURNAROUND TIME (CIRCLE ONE):

<8 HOURS

12 HOURS

24 HOURS

48 HOURS

3 DAYS

5 DAYS

5-10 DAYS

OTHER

REPORT RESULTS VIA (CIRCLE ALL THAT APPLY):

☐ PHONE☐ FAX☐ WRITTEN
REPORTPDF

NOTES/COMMENTS:

TRANSMITTAL RECORD:

Relinquished By: [Signature]Date: 11.13.13Time: 1821

Relinquished By: _____

Date: _____

Time: _____

Received By: [Signature]Date: 11/13/13Time: 800AM

Received By: _____

Date: _____

Time: _____

LABORATORY INFORMATION:

NAME: LA TESTINGLOCATION: Garage House

DISPOSITION OF SAMPLES:

☐ RETURN

DAYS AFTER ANALYSIS

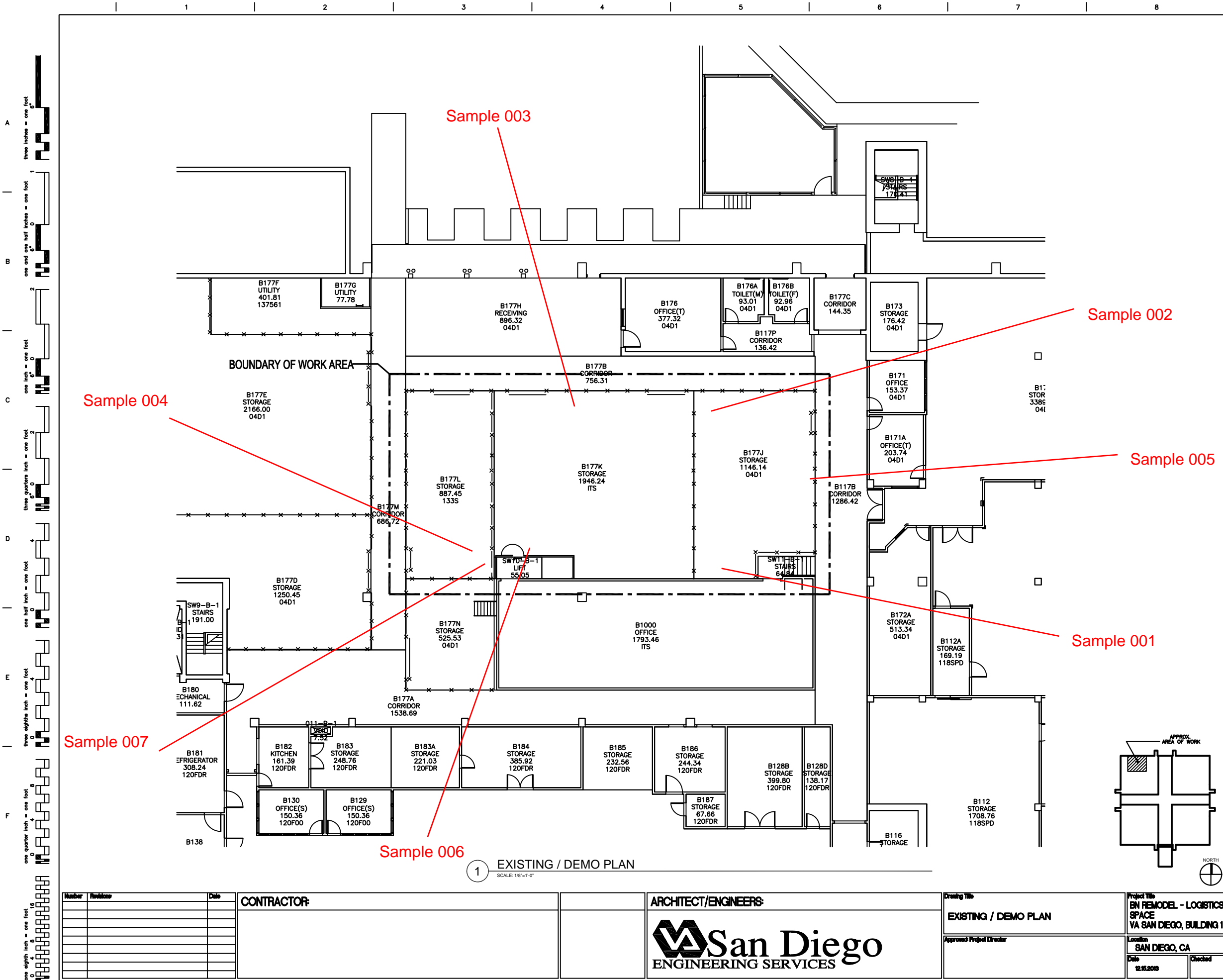
☒ RETAIN FOR90 DAYS☐ OTHER☐ YEAR (S)



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Appendix C

Drawing/Photo Log



GENERAL DEMO NOTES

- EXISTING ITEMS SCHEDULED TO REMAIN SHALL BE PROTECTED IN PLACE AND MAINTAINED BY THE CONTRACTOR. DAMAGE TO EXISTING EQUIPMENT, STRUCTURES, SYSTEMS AND SERVICES ARE THE RESPONSIBILITY OF THE CONTRACTOR AND SHALL BE RESTORED OR REPLACED TO THE SATISFACTION OF THE OWNER'S REPRESENTATIVE AT THE CONTRACTOR'S EXPENSE.
- ITEMS SCHEDULED TO BE DEMOLISHED SHALL BE DISPOSED OF OFF-SITE BY THE CONTRACTOR.
- ITEMS SCHEDULED TO BE REMOVED SHALL BE STORED FOR REUSE OR RETURNED TO THE OWNER'S REPRESENTATIVE AS DIRECTED.
- ITEMS SCHEDULED FOR REINSTALLATION/RELOCATION SHALL BE CLEANED, REATTACHED, RECONNECTED AND RETURNED TO THEIR FULLY FUNCTIONING CONDITION.
- UTILITIES PREVIOUSLY SERVING DEMOLISHED ITEMS SHALL BE CAPPED BEHIND ADJACENT FINISHED SURFACES UNLESS OTHERWISE DIRECTED IN THE CONTRACT DOCUMENTS. SEE MECHANICAL AND ELECTRICAL.
- DAMAGED OR PREVIOUSLY UNFINISHED SURFACES NEWLY EXPOSED BY DEMOLITION AND NEW WORK SHALL BE RESTORED, PATCHED OR FINISHED TO MATCH ADJACENT FINISHED SURFACES.
- SAW CUTTING AND/OR CORE DRILLING SHALL BE USED IN LIEU OF JACK HAMMERING IN ORDER TO MINIMIZE DISRUPTION TO FACILITY SERVICES AND PERSONNEL.
- THE DEMOLITION PLAN AND NOTES ARE PRESENTED AS GENERAL INFORMATION ONLY AND ARE NOT INTENDED TO REPRESENT A COMPREHENSIVE ACCOUNTING OF ALL CONDITIONS PRESENT AT THE PROJECT SITE. THE CONTRACTOR IS RESPONSIBLE FOR PREPARING THE SITE AS REQUIRED TO COMPLETE THE CONSTRUCTION OF THE FINISHED PROJECT AS DESIGNED AND DETAILED IN THE CONTRACT DOCUMENTS.

ASBESTOS NOTES

- 'WARNING' ASBESTOS MAY BE PRESENT IN INTERSTITIAL AREAS IN FIRE PROOFING ON STRUCTURAL STEEL, OVERSPRAY ON 4\"
- 'WARNING' ASBESTOS MAY BE PRESENT IN EXTERIOR WALL (TRANSITE) PANELS. DISPOSE OF ALL HAZARDOUS WASTE IN ACCORDANCE WITH LOCAL, STATE & FEDERAL REGULATIONS. CONTRACTOR TO WEAR RESPIRATOR AND PROTECTIVE COVERALLS IN ACCORDANCE WITH LOCAL, STATE & FEDERAL REGULATIONS.
- 'WARNING' ASBESTOS MAY BE PRESENT IN VINYL COMPOSITION FLOOR TILE & MASTIC. CONTRACTOR TO DISPOSE OF ALL HAZARDOUS WASTE IN ACCORDANCE WITH LOCAL, STATE & FEDERAL REGULATIONS. CONTRACTOR TO WEAR RESPIRATOR AND PROTECTIVE COVERALLS IN ACCORDANCE WITH LOCAL, STATE & FEDERAL REGULATIONS.

SHEET NOTES

KEYNOTE SYMBOL

- XXXXXXXXXXXXXXXXXXXX

WALL LEGEND

- | | |
|--|---|
| | Existing Wall to be Demolished |
| | Existing Wall to Remain |
| | Existing 1-hour Partition to Remain |
| | Existing 2-hour Partition to Remain |
| | Existing Smoke Barrier to Remain |
| | Non-Rated Partition See Wall Schedule |
| | 1-hour Partition See Wall Schedule |
| | 2-hour Barrier See Wall Schedule |
| | 1-hour Smoke & Fire Barrier See Wall Schedule |
| | 2-hour Smoke & Fire Barrier See Wall Schedule |
| | Not in Scope |

1 EXISTING / DEMO PLAN
SCALE: 1/8\"/>

Number	Revisions	Date	CONTRACTOR:	ARCHITECT/ENGINEERS:	Drawing Title	Project Title	Project Number	Office of Construction and Facilities Management
					EXISTING / DEMO PLAN	BN REMODEL - LOGISTICS SWING SPACE VA SAN DIEGO, BUILDING 1	664-13-304	
					Approved Project Director	Location SAN DIEGO, CA	Building Number 1	
						Date 12.15.2019	Drawing Number AE-101	
						Checked MM	Page 9 of XX	

PHOTO LOG



PHOTO 1: Fireproofing on structural beams and decking. Wrapped pipe insulation. Concrete floors and walls.



PHOTO 2: Fireproofing on structural beams and decking. Wrapped pipe insulation. Concrete floors and walls.



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strengthen

CITADEL
ENVIRONMENTAL
SERVICES, INC.

VA San Diego Healthcare System
3350 La Jolla Village Drive
BN Remodel Logistics Swing Space Project
San Diego, California 92161

Citadel Project No. 5137.1147.0 (Task 37)