

April 4, 2023

BAY AREA

Air Quality

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Peter Lezak

KB Homes South Bay Division 5000 Executive Parkway, Suite 125 San Ramon, CA 94538 plezak@kbhome.com

Re: ADMP RIN NOA-0251

Project: Communications Hill 2 Phase 3-4
Applicant: KB Homes South Bay Division

Dear Peter Lezak,

This letter is in response to the proposed Asbestos Dust Mitigation Plan (ADMP) referenced above for the subject project submitted to the Bay Area Air Quality Management District (Air District) by Ramboll US Consulting on behalf of KB Homes South Bay Inc. The proposed ADMP was submitted pursuant to subsection (e)(2)(A) of the Asbestos Airborne Toxic Control Measure for Construction, Grading, Quarrying, and Surface Mining Operations, Section 93105, Title 17, California Code of Regulations (Asbestos ATCM).

The reference identification number (RIN) for this ADMP is **NOA-0251.** Please refer to the RIN for any inquiries or submittals to the Air District regarding this ADMP.

The Air District received the final revised ADMP application on March 30, 2023, and determined that the proposed ADMP meets the applicable criteria pursuant to subsection (e)(4) of the Asbestos ATCM, provided the dust mitigation measures enumerated in the following sub-section are adhered to throughout the duration of construction and/or grading activities at the project:

6. DUST MITIGATION MEASURES

- 6.1 Track-out onto the Paved Public Road
- 6.2 Active Storage Piles
- 6.3 Inactive Areas and Storage Piles
- 6.4 Traffic on Unpaved Onsite Roads, Parking Lots, and Staging Areas
- 6.5 Earthmoving Activities
- 6.6 Off-Site Transport
- 6.7 Post Construction Stabilization of Disturbed Areas
- 6.8 Additional Dust Mitigation

In addition, approval of the proposed ADMP is subject to the requirements set forth below:

Air Monitoring:

The Air District approves the proposed monitoring plan provided that:

Connect with the Bay Area Air District:









- 1. Air monitoring is conducted in accordance with the Naturally Occurring Asbestos (NOA) ambient perimeter air monitoring protocols contained in the proposed ADMP.
- 2. Transmission electron microscopy (TEM) air sample results are continuously compiled throughout the duration of construction and grading activities at the project into a data spreadsheet and reported in units of total structures per cubic centimeter (s/cm³). The spreadsheet shall be submitted electronically for Air District review **once every two weeks** at https://baagmd.agency/noamonitoring, or scan the QR code.



3. Standard Operating Procedures for sample collection, processing, and shipping, as well as all calibration records for flow measuring devices, and records of the date and location of each monitor are available for inspection.

Startup notification:

1. The applicant shall submit electronic notification at least <u>24 hours</u> prior to beginning construction and/or grading activities at the project site to <u>compliance@baaqmd.gov</u> (identifying the project RIN in the Subject of each email).

This ADMP is the basis for compliance with the Asbestos ATCM for the **Communications Hill 2 Phase 3-4 in San Jose** and its terms must be implemented throughout the duration of the project. At the conclusion of the project, a letter stating the final date of work and detailing the post construction stabilization activities shall be submitted to the Air District to compliance@baagmd.gov.

Any questions you may have regarding this ADMP should be directed to Amy Meyer, Air Quality Specialist II, at ameyer@baaqmd.gov.

Sincerely,

- DocuSigned by:

Veronica Eady

Veronica Eady

Senior Deputy Executive Officer for Operations



BAY AREA AIR QUALITY MANAGEMENT DISTRICT 375 Beale Street, Suite 600

375 Beale Street, Suite 600 San Francisco, California 94105 (415) 771-6000

For District Use Only		
Date Rec'd	10/21/22	
File #	RIN-0251	

ASBESTOS AIRBORNE TOXIC CONTROL MEASURE FOR CONSTRUCTION AND GRADING OPERATIONS

§ 93105, Title 17, California Code of Regulations

ASBESTOS DUST MITIGATION PLAN APPLICATION

1. Company and Project Information					
Company Name and Address			Project Location	-	
Name			Location		
Address			Address		
City/State		Zip	City/State	Zip	
Contact			Start Date:		
Phone Fax			Estimated Completion Date:		
<u> </u>	·			·	

The following information is requested to assist in the evaluation of your Asbestos Dust Mitigation Plan. Omission of this information may result in a delay of the completion of the evaluation and approval of the plan. Please provide the information requested below; place a checkmark in front of each of the categories that applies.

2. Detailed Project Information		
Type of Project: (Check all that applies) Road or Railway Construction	Trenching / Utilities Work	
Road Maintenance Housing Development Commercial Property Development	Other (please describe)	

3. Detailed Site Information			
Areas and Facilities within a quarter mile (400 meters) of the Project: (Check all that applies)			
Residential	Hospital / Nursing Home	Other (please describe)	
Commercial	School		
Industrial	Park / Playground		
Rural			

ASBESTOS DUST MITIGATION PLAN APPLICATION

BAY AREA AIR QUALITY MANAGEMENT DISTRICT 375 Beale Street, Ste. 600, San Francisco, CA 94105

4. Additional Information

The following information MUST be included:

Map(s) clearly indicating:

Property lines / boundaries Storage areas / piles
Rights of way / easements Track-out control
Areas to be cleared or graded Staging areas for removal

Trenching areas Truck routes
Excavation sites On-site parking lots

If available, please attach the following information:

Geologic Information Topographical Maps Meteorological Data

CONSTRUCTION AND GRADING OPERATIONS CHECKLIST FOR PROJECTS GREATER THAN AN ACRE

ELEMENTS THAT MUST BE INCLUDED:

Each of the following sources of dust emissions MUST be addressed in the Asbestos Dust Mitigation Plan:

Track-out onto the paved public road;

Active storage piles;

Inactive disturbed surface areas and storage piles;

Traffic on unpaved on-site roads;

Earthmoving activities;

Off-site transport of materials; and

Post-project stabilization of disturbed soil surfaces.

ASBESTOS AIR MONITORING PLANS:

If required by the District, complete an Asbestos Air Monitoring Plan for District approval.

An air monitoring plan **MAY BE** required if one or more of the following lies within a quarter mile (400 meters) of any boundary of an area to be disturbed:

Residence;

School / Daycare center;

Industrial Facility

Business;

Park / Playground;

Hospital / Nursing Home

Development of an Asbestos Air Monitoring Plan does not constitute a requirement to implement air monitoring.

However, if the District would like to determine the effectiveness of the application of the dust mitigation measures listed in your dust mitigation plan, the plan would be required to be implemented within one business day of notification from the District.

ASBESTOS DUST MITIGATION PLAN APPLICATION

BAY AREA AIR QUALITY MANAGEMENT DISTRICT 375 Beale Street, Ste. 600, San Francisco, CA 94105

5. Tı	rack-out onto the paved public road		
Please	Please mark the box preceding each measure that will be implemented:		
	MEASURE MUST BE ADDRESSED: Any visible track-out on a paved public road at any location where vehicles exit the work site MUST be removed; Removal MUST be done using wet sweeping or a HEPA filter-equipped vacuum device at the end of the work day or at least one time per day.		
AND	installation of one or more of the following track-out prevention measures:		
	A gravel pad designed using good engineering practices to clean the tires of exiting vehicles A tire shaker A wheel wash system Pavement extending for not less than fifty (50) consecutive feet from the intersection with the paved public road Any other measure(s) as effective as the measures listed above: (Briefly describe below)		
6. A	ctive Storage Piles		
_	MEASURE MUST BE ADDRESSED: Keep active storage piles adequately wet or covered with tarps.		
7. In	nactive Areas and Storage Piles		
	e mark the box preceding each measure that will be implemented:		
Contro days s	ol for disturbed surface areas and storage piles that will remain inactive for more than seven (7) shall include one or more of the following: Keep the surface adequately wet; Establish and maintain of surface crusting sufficient to satisfy the test in subsection 93105(h)(6); Apply chemical dust suppressants or chemical stabilizers according to the manufacturer's recommendations; Cover with tarp(s) or vegetative cover; Install wind barriers of fifty percent (50%) porosity around three (3) sides of a storage pile; Install wind barriers across open areas; Any other measure(s) deemed as effective as the measures listed above. (Briefly describe below)		

ASBESTOS DUST MITIGATION PLAN APPLICATION BAY AREA AIR QUALITY MANAGEMENT DISTRICT 375 Beale Street, Ste. 600, San Francisco, CA 94105

8. T	raffic on On-Site Unpaved Roads, Parking Lots, and Staging Areas
Pleas	e mark the box preceding each measure that will be implemented:
THIS	MEASURE MUST BE ADDRESSED: A maximum vehicle speed limit of fifteen (15) miles per hour or less;
AND	Mater every two hours of active operations or sufficiently often to keep the area adequately wetted; Apply chemical dust suppressants consistent with manufacturer's directions; Install wind barriers of fifty (50) percent porosity around three (3) sides of a storage pile; Maintain a gravel cover with a silt content that is less than five (5) percent and asbestos content that is less than 0.25 percent, as determined using an approved asbestos bulk test method, to a depth of three (3) inches on the surface being used for travel; or Any other measure(s) deemed as effective as the measures listed above. (Briefly describe below)
	e mark the box preceding each measure that will be implemented:
	ol for earthmoving activities must include one or more of the following: Pre-wet the ground to the depth of anticipated cuts; Suspend grading operations when wind speeds are high enough to result in dust emissions crossing the property line, despite the application of dust mitigation measures; Apply water prior to any land clearing; or Any other measure(s) deemed as effective as the measures listed above. (Briefly describe below)

ASBESTOS DUST MITIGATION PLAN APPLICATION

BAY AREA AIR QUALITY MANAGEMENT DISTRICT 375 Beale Street, Ste. 600, San Francisco, CA 94105

10. Off-Site Transport

Please mark the box preceding each measure that will be implemented:

THIS MEASURE MUST BE ADDRESSED:

The owner or operator must ensure that no trucks are allowed to transport excavated material off-site unless:

Maintain trucks such that no spillage can occur from holes or other openings in cargo compartments; AND Loads are adequately wet;

AND Either of the following measures:

Cover with tarps; or

Load such that the material does not touch the front, back, or sides of the cargo compartment at any point less than six inches from the top and that no point of the load extends above the top of the cargo compartment.

11. Post Construction Stabilization of Disturbed Areas

Please mark the box preceding each measure that will be implemented:

pon completion of the project, disturbed surfaces shall be stabilized using one or more of the
llowing:
Establish a vegetative cover;
Place at least three (3.0) inches of non-asbestos-containing material;
Paving; or
Any other measure deemed sufficient to prevent wind speeds of ten (10) miles per hour or greater from causing visible dust emissions. (Briefly describe below)

ASBESTOS DUST MITIGATION PLAN

COMMUNICATIONS HILL 2 PHASES III and IV SAN JOSE, CALIFORNIA

REVISION 5

Submitted to:

Bay Area Air Quality Management District San Francisco, California

On Behalf of:

KB Home South Bay, Inc. San Ramon, California

Prepared By:

Ramboll US Consulting San Francisco, California

Date

March 30, 2023

Project Number **1690026583**



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ATTACHMENTS

Attachment A: Wind Roses from San Jose Airport (December 2021 through December 2022)

Attachment B: Historical Sampling Results for Naturally Occurring Asbestos

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1. INTRODUCTION

On behalf of KB Home South Bay, Inc. (KB Home; "Developer"), Ramboll US Consulting, Inc. (Ramboll) has prepared this Asbestos Dust Mitigation Plan (ADMP) related to the Phase III and IV development activities at Communications Hill 2 in San Jose, California (Figure 1).

Phase I of the site development is complete, and horizontal construction and land development activities of Phase II are largely completed, as is vertical construction. This ADMP is primarily focused on Phases III and IV horizontal (i.e., land development) and vertical (i.e., building of structures) construction; however, there will be some overlap with the remaining Phase II vertical construction (see Figure 1).

This ADMP describes the control measures that KB Home must implement to reduce the potential for dust generation from construction or grading activity as defined in the Final Regulation Order, Asbestos Toxic Control Measure for Construction, Grading, Quarrying, and Surface Mining Operations (ATCM) under California Code of Regulations (CCR) Title 17, Section 93105.¹ While no amount of control measures can completely eliminate exposure to naturally occurring asbestos (NOA), which is common in the area and underlies a significant portion of developments in the San Jose area, the dust mitigation procedures set forth in the ADMP are designed to ensure that no equipment or operation emits dust that is visible crossing the property line of the site.

Introduction Ramboll

The ATCM defines construction or grading activity as "any surface disturbance conducted with powered equipment or any related activity, including, but not limited to, all surface and subsurface cuts and fills, excavation, trenching, stockpiling, bulldozing, and landfills."

2. REGULATORY FRAMEWORK

This ADMP has been prepared pursuant to Title 17 of the California Code of Regulations (17 CCR) Section 93105, Asbestos Airborne Toxic Control Measure (ATCM) for Construction, Grading, Quarrying and Surface Mining Operations.

This ADMP incorporates requirements of 17 CCR, Section 93105, the asbestos ATCM for Construction, Grading, Quarrying, and Surface Mining Operations.

Neither Developer nor any of its contractors, subcontractors, representatives, or agents, shall engage in any construction or grading activity (as defined by the ATCM) anywhere on this site, unless the provisions of the ADMP, including without limitation the mitigation measures presented in Section 6 and the air monitoring measures presented in Section 7, are implemented at the beginning and maintained throughout the duration of the construction or grading activities.

2.1 Asbestos Airborne Toxic Control Measure

The asbestos ATCM (17 CCR 93105(b)(1)) states that the ADMP, and the dust mitigation measures contained therein, apply to "any construction, grading...operation on any property [where]...[a]ny portion of the area to be disturbed is located in a geographic ultramafic rock unit." The terms "Construction", "Grading", "Construction or Grading Operation" and "Construction or Grading Activity" are defined in the ATCM to mean "any surface disturbance conducted with powered equipment or any related activity, including, but not limited to, all surface and subsurface cuts and fills, excavation, trenching, stockpiling, bulldozing, and landfills" (17 CCR, Section 93105, subdivision (i)(12)). Regulatory authority for compliance with the ATCM resides with the BAAQMD.

Regulatory Framework Ramboll

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3. PROJECT DESCRIPTION

KB Home and Ramboll must work with the on-site contractors to ensure communication and awareness of this ADMP and any potential air quality concerns at the site. In addition to the procedures described herein, the individual contractors working at the site must be responsible for establishing and maintaining their own appropriate health and safety procedures to minimize worker and public exposure to site contaminants during construction.

3.1 Description of Planned Site Redevelopment

As currently envisioned, the development project consists of four phases, with Phase I complete and Phase II nearing completion. Earthwork associated with Phase III and Phase IV (the primary areas addressed by this ADMP) has not yet been started. The Phase III and Phase IV areas are shown on Figure 2.

The combined Phase III and IV land development area is approximately 176 acres in size, and the associated Phase III and Phase IV construction area (the areas where residential construction will occur) are approximately 30 acres and 26 acres in size, respectively.

Vertical construction will still be ongoing in the Phase II area when Phase III and IV earthwork begins.

3.2 Regional Topography and Site Setting

The Communications Hill 2 Phase III and IV development areas are located approximately four miles southeast of downtown San Jose, California (Figure 1). The area is situated on the northeastern portion of a topographic ridge with an elevation of approximately 350 feet above mean sea level (msl), which is approximately 200 feet above the surrounding areas of San Jose.

The Phase III and IV development areas are located in the northern portion of Communications Hill 2. The current ground surface within the Phase III development area generally slopes downward toward the northeast and northeast. Within the Phase IV development area, the current topography is generally level.

Site surroundings are shown on 1. To the northwest, north, northeast, and east of the site are undeveloped areas and a reclaimed aggregate quarry. To the south and southeast of the site is the Communications Hill 2 Phase I residential area including William Lewis Manly Park. To the west of the site is a hill with a telecommunications tower, as well as residential areas including the adjacent Tuscany Hills development.

3.2.1 Surface Water

There are no surface water bodies on the site. The site is located approximately 12 miles southeast of San Francisco Bay.

3.2.2 Site Geologic Setting

The Santa Clara Valley is underlain by basin deposits and alluvial deposits ranging from Pleistocene to Holocene in age. Sedimentary deposits vary to more than 1,000 feet thick in the Santa Clara Valley. The site is situated on an elongated bedrock high that rises

Project Description Ramboll

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approximately 200 feet above the surrounding areas of the Santa Clara Valley alluvial plain. The bedrock is part of the Franciscan Complex, which includes ultramafic serpentinite and silica-carbonate altered serpentinite.

3.2.3 Wind Direction

As shown in Figures 1 through 6, the typical wind direction at the site is from the northwest towards the southeast. This wind direction is based on historical wind direction and speed data recorded at the San Jose Airport meteorological monitoring station (KSJC). An annual wind rose representing the 12-month period from December 2021 through December 2022 is included on Figure 1, and the predominant wind direction is shown on Figures 2 through 6. The annual wind rose, and monthly wind roses from this time period, are provided in Attachment A.

3.3 Scope of Work

The ATCM defines construction and grading activities as any surface disturbance conducted with powered equipment or any related activity, including, but not limited to, all surface and subsurface cuts and fills, excavation, trenching, stockpiling, bulldozing, and landfills. Work to be executed for the project includes the following five general activities to be conducted over the duration of the project:

- Grading Grading includes the placement and removal of soil to achieve a flat working space prior to preparation of foundation areas.
- Excavation This type of work includes the excavation of foundation features, underground utility trenches, and other below-grade work in support of site construction, as well as the associated stockpiling, loading, and hauling of excavation spoils.
- Building Construction This type of work includes foundation construction, utility installation, and construction and finishing of the new residential buildings.
- Surface Features This work includes fine grading and installation of new surface features (roadways, landscaping, walking paths, patio and backyard areas). It is expected that following completion of these surface features, the site must be stabilized with respect to construction and grading activities. BAAQMD must be notified prior to the completion of construction and grading activities with a request to cease monitoring when the activities are complete and the disturbed areas have been stabilized.

For each of these activities, this ADMP defines mitigation measures to be employed, as described in Section 6.

Project Description Ramboll

4. LOCATIONS OF SERPENTINE-CONTAINING SOILS

The locations of serpentine-containing soils at the site are described below. Also included in this section are procedures for making observations of soil content to identify any additional areas of potential serpentine-containing soils that may be encountered during development activities.

4.1 Known Locations of Serpentine-Containing Soils

The NOA in the bedrock is chrysotile asbestos that is visible in hand samples and occurs within serpentinized basalt as veins with cross-fibers. Bedrock sampling conducted in 2006 and 2009 has shown NOA concentrations (as chrysotile) that range from 11% to 30% using polarized light microscopy (PLM) methods.² Sampling locations are shown on Figure 1. A summary of analytical results is provided in Attachment B. A geologic map is provided as Figure 7.

4.2 Procedures for Soil Inspection and Notifications

During construction and grading activities, areas of soil potentially containing serpentine (or other sources of asbestos) may be identified via observation as follows:

• <u>Presence of serpentine-containing rock in native soil materials or bedrock.</u> If dark gray or greenish serpentine rock (potentially having white fibrous inclusions) is identified, the material may potentially contain NOA.

Any native soil encountered at the site is considered to potentially contain NOA.

A Soil Management Plan (SMP)³ prepared for the project provides instructions on the management of potentially contaminated soils, including NOA in native soil or bedrock materials. The SMP is kept in the construction superintendent's office for reference.

Strategic Engineering & Science (SES). 2009. Phase II Environmental Site Assessment Report, Communications Hill, San Jose, CA. May 8.

³ McCloskey Consultants, Inc. 2017. Soil Management Plan, Communications Hill 2 Phase II, San Jose. August 29.

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5. POTENTIAL SOURCES OF DUST EMISSIONS

Site control methods must be used during construction and grading activities to mitigate dust generation. Section 6 of this ADMP lists methods for control of fugitive dust generated by construction and grading activities, including:

- Construction Traffic Movement of construction related vehicles, equipment and/or
 materials around the site on unpaved travel routes. All contractor personal vehicles are
 only allowed to travel and park on surfaces encapsulated with pavement or imported
 gravel. Construction traffic is routed along the new Communications Hill Boulevard
 roadway along the northern boundary of the site, including track-out controls (wet
 sweeping) along approximately 2,000 linear feet of this paved roadway, before the
 construction traffic enters the public roadway. Construction traffic no longer uses the
 Llano De Los Robles Avenue roadway.
- Site Preparation and Foundation Work Grading, placement of fill soil, construction and paving of streets, excavation of footings and foundations, installation of foundations, and backfilling operations.
- Trenching and Utility Construction Activities Excavation of trenches for the installation of underground utilities.
- Material Stockpiles Handling of stockpiles of excavated soil from construction and grading activities and stockpiles of imported fill material, gravel and landscaping material.
- Vertical Construction Activities Material handling, foot traffic, and vehicle traffic over unpaved or unencapsulated surfaces, as related to construction and finishing of residential buildings.
- Completion Activities Landscaping and re-vegetating of disturbed areas, removal of scaffolds and other temporary infrastructure, and demobilization of heavy equipment.
- Any other "Construction," "Grading," "Construction or Grading Operation" or "Construction or Grading Activity" as defined by 17 CCR § 93105, subdivision (i)(12).

6. DUST MITIGATION MEASURES

Dust control measures must be implemented by the contractor in accordance with the Asbestos ATCM during all construction and grading work at the site (as defined in the ATCM and Section 2.1 of this ADMP) for the duration of the project.

Dust mitigation measures can be separated into 1) routine procedures and 2) additional dust mitigation measures. Routine procedures are described in Sections 6.1 through 6.7, and additional dust mitigation measures are described in Section 6.8.

Additional dust mitigation measures must be implemented if routine dust mitigation measures are not successful in controlling dust emissions from construction and grading activities. Additional dust mitigation measures must be implemented if asbestos concentrations exceed the perimeter air monitoring action level, and must be implemented in response to observations of changing site conditions (e.g., higher wind speeds, observations of visible fugitive dust, or complaints of excessive dust generation by off-site parties), which may or may not result in an elevated NOA measurement at a perimeter monitoring station.

6.1 Track-Out Onto the Paved Public Road

Track-out is caused by motor vehicles, haul trucks and/or equipment departing the site with residual dirt or dust on the exterior surfaces of the vehicle, including the tires or undercarriage. Residual soil material becomes deposited on paved public road surfaces outside the site and can later be mobilized as airborne dust by subsequent vehicle traffic. All of the following control measures shall be implemented to control track-out:

- Removal of any visible track-out from a paved public road at any location where vehicles exit the work site. This must be accomplished by using wet sweeping or a high-efficiency particulate air (HEPA) filter-equipped vacuum device at the end of the work day or at least one time per day. The use of dry power sweeping is prohibited; and
- A gravel pad designed using good engineering practices must be installed at any
 locations where construction vehicles must drive from unpaved areas onto paved public
 roadways to clean the tires of all trucks, vehicles and equipment. These areas must be
 maintained throughout the duration of construction and grading activities at the site and
 must be repaired, modified or cleaned as necessary to ensure effectiveness.

6.2 Active Storage Piles

A storage pile is considered active if material is added to or removed from the storage pile within seven (7) calendar days. Control for active storage piles shall include one or more of the following:

- Active storage piles must be kept adequately wetted; or
- Active storage piles must be kept covered with tarp when soil is not being added or removed.

6.3 Inactive Areas and Storage Piles

A surface area is considered inactive if no activities are planned within the area for more than seven (7) calendar days. Storage piles are considered inactive if material is not added

Dust Mitigation Measures Ramboll

to or removed from the storage pile for more than seven (7) calendar days. Control for disturbed surface areas and storage piles that must remain inactive for more than seven (7) days shall include one or more of the following:

- Keep the surface adequately wetted;
- **Establishment and maintenance of surface crusting** sufficient to satisfy the test in subsection (h)(6) of the ATCM;
- Applying non-toxic soil stabilizers (also known as dust palliatives or dust suppressants, including hydro-mulch or hydro-seed material) according to the manufacturer's recommendations;
- Covering with tarps;
- Installation of stockpile wind barriers of fifty (50) percent porosity around three (3) sides of a storage pile; or
- Installation of wind barriers which must be installed perpendicular to the predominant wind direction every 50 to 100 yards.

6.4 Traffic on On-Site Unpaved Roads, Parking Lots, and Staging Areas

Control for on-site unpaved roads, parking lots, and staging areas shall include:

- Installing and maintaining gravel cover for all unpaved construction roadways, parking lots, and staging areas. The site must ensure that all construction traffic (worker vehicles, construction heavy equipment, delivery trucks) travels on paved surfaces or on gravel cover that is at least three (3) inches thick. The gravel cover shall have a silt content less than five (5) percent and asbestos content less than 0.25%, as determined using an approved asbestos bulk test method; and
- Limiting the maximum on-site speed for vehicles to fifteen (15) miles per hour (mph) or less on unpaved site areas. Visible speed limit signs are posted at entrances to the site, along roadways within the site, and along construction traffic routes in off-site areas; and
- Watering every two (2) hours of active operations, or sufficiently often to keep the area adequately wetted.

6.5 **Earthmoving Activities**

Control for earthmoving activities shall include:

- Pre-wetting the ground to the depth of anticipated cuts; and
- Suspending excavation, grading operations, and other construction activities when wind speeds are high enough to result in dust emissions crossing the property line despite the application of dust mitigation measures; and
- **Application of water** prior to any land clearing.

Dust Mitigation Measures Ramboll

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6.6 Off-Site Transport

No trucks are allowed to transport excavated material off-site unless:

- Vehicles are maintained such that no spillage can occur from holes or other openings in cargo compartments; and
- Loads are adequately wetted and either:
 - Covered with tarps; or
 - Loaded such that the material does not touch the front, back, or sides of the cargo compartment at any point less than six (6) inches from the top and that no point of the load extends above the top of the cargo compartment.

6.7 Post-Construction Stabilization of Disturbed Areas

Upon completion of the project, disturbed surfaces shall be stabilized using one or more of the following methods:

- Establishment of a vegetative cover;
- Placement of at least three (3) inches of non-asbestos-containing materials; or
- **Paving or covering with hardscape** (e.g., building foundation, sidewalks, and pavement).

6.8 Additional Dust Mitigation Measures

In the event that asbestos concentrations exceed the perimeter air monitoring action level, or the above measures are unsuccessful at controlling dust emissions from construction and grading activities, one or more of the following additional dust mitigation measures must be implemented until the condition stabilizes:

- Increased Frequency of Roadway Watering: Increase water application frequency on unpaved roadways and disturbed soil areas to eight (8) times per day or greater (i.e., hourly during work hours).
- **Increase Frequency of Track-Out Removal**: Frequency of wet sweeping and/or use of HEPA filter-equipped vacuum devises to three times per day.
- **Increased Resources for Task-Specific Watering:** Increase the number of water trailer hose crews, water trucks, that are deployed for task-specific focused watering.
- **Soil Stabilization:** Application of soil stabilizer, hydromulch or hydroseed compound, and/or covering with fabric or plastic, in undisturbed soil areas.
- **Decrease Pace of Work:** Slow the pace of soil movement or handling to the degree feasible while allowing for progress and safe work, and/or limit construction and grading activities to periods of calm winds, including monitoring by the on-site compliance officer.
- **Reduce Drop Heights:** Reduce drop heights to the minimum safe drop height attainable with the excavation and loading equipment being used, including monitoring by the on-site compliance officer.

Dust Mitigation Measures Ramboll

- **Speed Limit:** Communicate and post a reduced site speed limit (ten [10] miles per hour), including monitoring by the on-site compliance officer.
- **After Hours Watering:** After hours watering, either by additional water truck activity or installation of a sprinkling or misting system, must be implemented.

The additional watering dust control measures shall not be required when the soil is otherwise adequately wetted, e.g., due to rainy weather conditions.

Dust Mitigation Measures Ramboll

7. AIR MONITORING

While the asbestos ATCM does not require air monitoring for NOA, the regulation does provide provisions that allow the BAAQMD to require an air monitoring component. BAAQMD requires that air monitoring be performed if public space areas, residential, and/or commercial facilities are located within 0.25 mile of the site. As shown in Figure 1, there are residential areas, commercial businesses, schools, day cares, and parks or other recreational facilities located within 0.25 mile of the site. There are no known hospitals or nursing homes within 0.25 mile of the site.

Air monitoring during the project must consist of airborne asbestos perimeter dust monitoring. Airborne asbestos perimeter monitoring must occur on every day of construction and/or grading activity (as defined by the ATCM), for the duration of the project.

Also presented in this plan are those specific actions that must be taken by contractors if the level of airborne asbestos is detected at or above project action levels.

No airborne asbestos monitoring will be conducted when there are no construction and/or grading activities (as defined by the ATCM) occurring. No changes shall be made to the air monitoring program without notifying and receiving approval from the BAAQMD.

7.1 Airborne Asbestos Monitoring Program

A perimeter airborne asbestos monitoring program using high-volume sampling methods consistent with the United States Environmental Protection Agency (USEPA) Asbestos Hazard Emergency Act (AHERA) asbestos sampling methodology must be conducted to measure and document the concentration of airborne asbestos dust in ambient air. The monitoring program is described below.

7.2 Air Sampling Equipment

Sampling at all airborne asbestos monitoring stations must be conducted using battery operated heavy duty vacuum pumps (e.g., model SKC 1532, BGI 100, or equivalent) at each of the monitoring stations. Selected equipment must be of the type that is used extensively in air sampling for asbestos.

The sampling train must consist of the following: pump, flow regulator/dampener, a lockable air flow adjustment valve, tygon tubing and filter cassette assembly. The cassette must be attached to a tripod, or equivalent, to ensure the filter cassette maintains an elevation of 4 to 5 feet above ground surface and the filter cassette must be situated at a 45-degree angle. The filter cassettes must have a 25-millimeter open face cowl and must consist of a mixed cellulose ester (MCE) filter with a 0.45-micron pore size.

Each of the pumps, battery packs and sampling trains must be inspected and calibrated regularly to ensure proper operation. To prevent tampering or vandalism, sampling equipment must be placed in locked boxes and, if possible, behind locked fences. In the event that a monitor is found to not be operating properly, BAAQMD staff must be notified of the location, monitor name, time discovered, plan of action and estimated time needed to complete repairs as soon as practicable, but no later than 24 hours after the discovery of the inoperable monitor.

7.3 Siting of Airborne Asbestos Sampling Devices

The airborne asbestos monitoring program must be performed to determine the efficacy of dust control measures at the site.

The initial air monitoring network will consist of thirteen (13) air monitoring locations (S1-AM01 through S1-AM13) at the start of earthwork, as shown in Figure 2.

The wind rose diagrams (Figure 1 and Attachment A) illustrate the general historical wind speed, direction, and frequency of occurrence in the vicinity of the site. Wind roses and have been used to establish a prevailing wind direction and to confirm suitability of monitoring station locations. The prevailing wind direction at the site is from the northwest to the southeast, as shown in Figures 2 through 6.

Sampling must be conducted at or near work area boundaries. The results of airborne asbestos monitoring from the monitoring network must inform specific dust mitigation measures for the site (e.g., additional street cleaning, application of additional dust control water at the point of excavation, etc.).

Each monitoring probe must be located a minimum of two (2) meters away from all obstructions. Obstructions include (but not limited) to vertical walls, buildings, site equipment, stockpiles, wind screens, vehicles, and vegetation over twelve (12) inches high. When possible, the monitoring equipment must be located at least ten (10) meters away from the drip line of trees and ten (10) meters away from buildings. Obstructions that may impact airflow must be evaluated regularly given that local obstructions can change due to human activity and vegetation growth. Sampling equipment must have unrestricted airflow in an arc of at least 180 degrees, which includes the predominant wind direction with the greatest potential for the presence of asbestos in air to occur.

Construction activities may require temporary relocation of airborne asbestos monitors. Should one of the monitors be in direct conflict with construction activities, it may be moved up to 50 feet from its designated location. BAAQMD must be notified whenever monitors are moved. Once the construction activities within the area are complete, the airborne asbestos monitor(s) must be moved back to their designated location(s). No monitor will be moved more than 50 feet from the location described in this plan without notifying and receiving approval from the BAAQMD.

7.4 Monitoring Network Changes

The monitoring network at the site will initially include 13 monitoring stations which are identified as S1-AM01 through S1-AM13, as shown on Figure 2. As construction progresses, the air monitoring network will be modified by relocating and/or removing air monitors (as shown in Figures 3 through 6):

- Figure 2 shows the initial location of the monitors during the main grading and site preparation work for the overall Phase III/IV (Stage 1 of redevelopment). During Stage 1 of redevelopment, air monitors S1-AM01 through S1-AM13 will be utilized.
- Figure 3 shows the revised air monitoring network to be implemented once construction
 has been substantively completed within takedown area 6, and residents have begun
 moving into homes in that area (Stage 2 of redevelopment). During Stage 2 of
 redevelopment, air monitors S2-AM01 through S2-AM13 will be utilized.

- Figure 4 shows the revised air monitoring network to be implemented once construction has been substantively completed within takedown areas 6 and 7, and residents have begun moving into homes in those areas (Stage 3 of redevelopment). During Stage 3 of redevelopment, air monitors S3-AM01 through S3-AM13 will be utilized.
- Figure 5 shows the revised air monitoring network to be implemented once construction has been substantively completed within takedown areas 6, 7, and 8, and residents have begun moving into homes in those areas (Stage 4 of redevelopment). During Stage 4 of redevelopment, air monitors S4-AM01 and S4-AM04 through S4-AM13 will be utilized.
- Figure 6 shows the revised air monitoring network to be implemented once construction
 has been substantively completed within takedown areas 6, 7, 8, and 9, and residents
 have begun moving into homes in those areas (Stage 5 of redevelopment). During Stage
 5 of redevelopment, air monitors S5-AM01 and S5-AM04 through S5-AM13 will be
 utilized.

It is possible that adjustments may be needed due to unforeseen circumstances or changes to the construction sequence.

No air monitor will be moved more than 50 feet from the location described in this plan without notifying and receiving approval from BAAQMD.

7.5 Modifications to Airborne Asbestos Monitoring Network(s)

As new areas within the site become active and as other areas are completed, it may be appropriate to move and/or remove airborne asbestos monitoring stations (as shown on Figures 2 through 6) and/or reduce the frequency of monitoring. Another instance when a modification may be proposed is after several months of data collection. If the collected data indicate that the application of mitigation measures is successful, amendments to the monitoring program may be proposed for BAAQMD review and approval. No modification to the monitoring network or sampling schedule can be made without notifying and receiving approval from the BAAQMD for this change.

The BAAQMD ADMP Amendment Request must be submitted in writing and include the following minimum information:

- The reason for the modification;
- A description of the proposed modification;
- A map depicting the current and proposed monitoring locations;
- A map depicting current and future areas to be disturbed;
- Change to project completion date;
- Percent of job completed and amount of construction and grading that is still needed;
- Pictures of current state of project; and
- Air sampling results to date for project.

If the ADMP Amendment Request is approved by the BAAQMD, any necessary field modifications to the monitoring network must be executed, new locations secured, and a new map of monitoring locations must be posted in the construction site office with a copy of the BAAQMD approval letter.

If air monitoring results demonstrate sufficient dust mitigation through low levels of perimeter asbestos concentrations, a request may be made to reduce or suspend perimeter asbestos dust monitoring, pending approval from BAAQMD. The request must include all data collected to that point and must provide the basis for the reduction or suspension of sampling. BAAQMD must make the determination based on the submitted data.

7.5.1 Sampling Duration and Frequency

Airborne asbestos monitoring samples must be collected over a continuous 24-hour period beginning and ending at the same time each day when construction and grading activities are occurring. At the time of sample collection and setup for the next monitoring run, a field technician must record in a field notebook the sample ID number, the sample location, the date and time the pump was activated, the date and time the pump was deactivated, the flow rate at the start of sampling and the flow rate at the end of sampling. The calculated average flow rate and the calculated total volume of air pumped during the sampling run must be presented on each chain-of-custody form that must remain with the samples until they are delivered to the analytical laboratory. The chain-of-custody form must be made a part of the analytical laboratory report for each set of samples.

A rotameter must be used to calibrate the flow rate both before and after sample collection. The rotameter must be attached to the end of the sampling train to check the flow rate. The field technician must read the flow rate and record the reading. When the sample cassette is removed, it is labeled and placed in a sealable plastic bag. Once handling of the previous day's sample is complete, a new cassette is fitted onto the end of the tygon tubing, the cover placed over the cowl and the rotameter attached to check the flow rate at the start of sampling. If an adjustment is necessary, the technician must turn the regulator until the desired flow rate is achieved. The desired flow rate is between 2.5 and 3.5 liters per minute for a 24-hour sampling period.

At the conclusion of setup and sampling at all monitoring stations, within 24 hours of sample collection the samples must be delivered to a California accredited analytical laboratory for analysis. All samples must be accompanied by the chain-of-custody filled out for that day's sampling. A laboratory turnaround time of 24 hours must be requested for each sample.

7.5.2 Analytical Method and Procedure

Asbestos air samples must be analyzed by transmission electron microscopy (TEM) per the USEPA AHERA criteria pursuant to 17 CCR Section 93105. The following criteria are required by the ATCM and must be included:

- The analytical sensitivity shall be 0.001 structures per cubic centimeter (S/cm³); and
- All asbestos structures with an aspect ratio greater than three to one (3:1) shall be counted, irrespective of length.

15

For consistency with the site monitoring program and reporting activities to date, the asbestos data will be reported in S/cm³.

7.6 Reporting and Data Availability

A summary of daily results from airborne asbestos monitoring stations and a cumulative air monitoring data spreadsheet must be distributed to all project stakeholders via email. The email distributions must include BAAQMD staff, Developer staff, and contractors working on behalf of the Developer. Air monitoring results summaries must be sent no later than the close of business on the next business day after the day the lab report was received. All QA/QC procedures, laboratory analytical reports, and related records (including records identifying the current stage of redevelopment and currently active air monitoring network) must be kept on site and made available upon request.

Additionally, the Developer shall submit the following to the District:

- The results of any additional air monitoring conducted at the request of the District;
 and
- 2. The results of any asbestos bulk sampling that meets any of the following conditions:
 - i. Asbestos bulk sampling conducted by the owner/operator to document applicability of or compliance with this section; or
 - ii. Asbestos bulk sampling done at the request of the District.

The Developer shall maintain all of the following records for at least seven (7) years following the completion of the construction project:

- 1. The results of any air monitoring conducted at the request of the District;
- 2. The documentation for any geologic evaluation conducted on the property for the purposes of obtaining an exemption, except the archive of collected samples which may be discarded at the expiration of the exemption or one (1) year after the exemption is granted whichever is less; and
- 3. The results of any asbestos bulk sampling that meets any of the following conditions:
 - i. The asbestos bulk sampling was conducted by the owner/operator to document the applicability of or compliance with this section, or
 - ii. The asbestos bulk sampling was done at the request of the District.

7.7 Air Monitoring Action Level

For any elevated reading at or above the action level, the Air District shall be notified as soon as possible.

If any monitor in the Air District-approved ambient air monitoring network measures airborne asbestos levels equal to or greater than 0.016 s/cc³ or 16,000 s/m³, the Developer shall complete an Elevated Reading Notification Form and submit it to the Air District with copies of all laboratory results and all sample chain of custody forms no later than the close

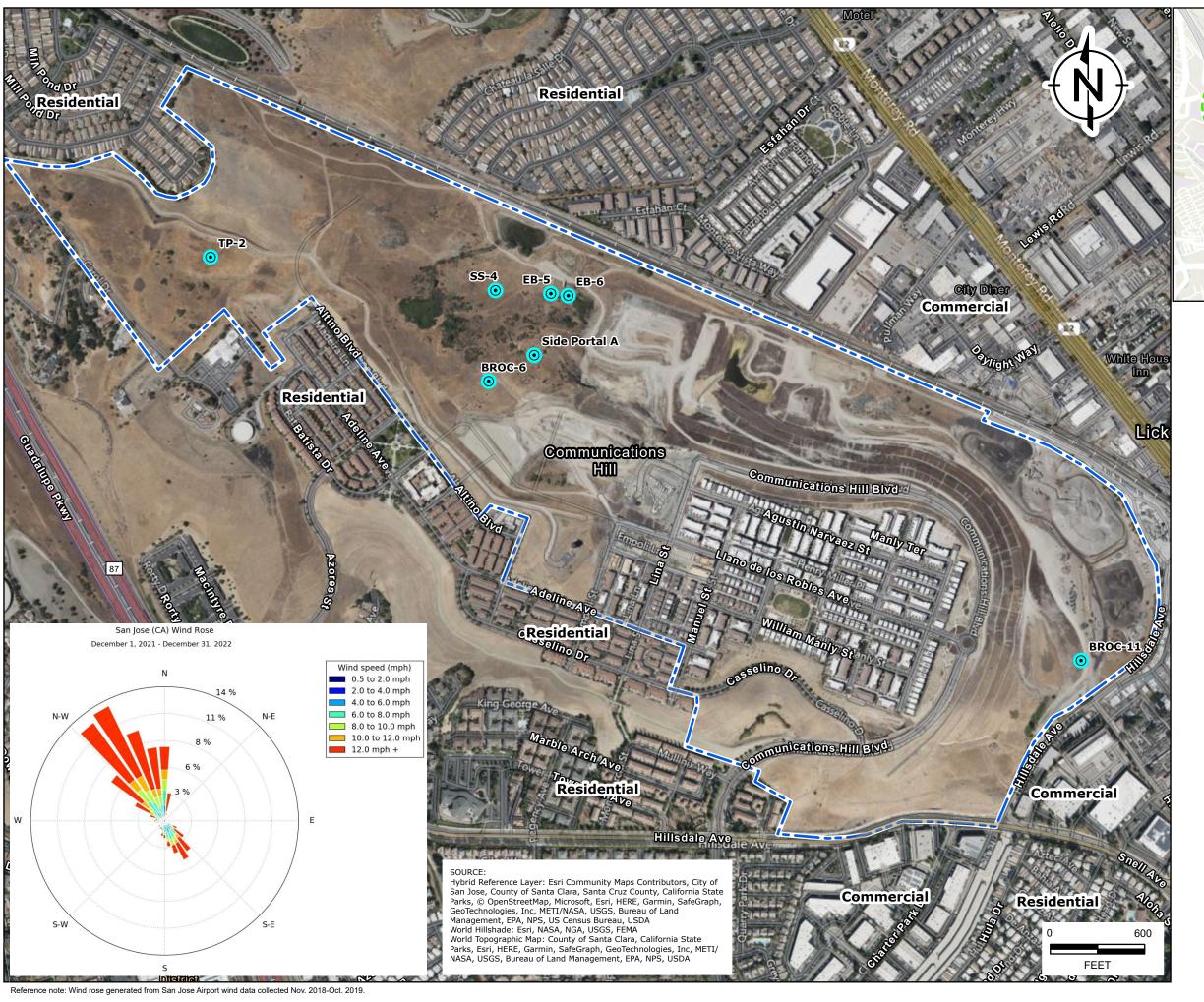
of business on the next business day after the lab report was received. The Elevated Reading Notification Form, laboratory results, and chains of custody shall be submitted via email to compliance@baaqmd.gov. At a minimum, the Elevated Reading Notification Form shall include the following information:

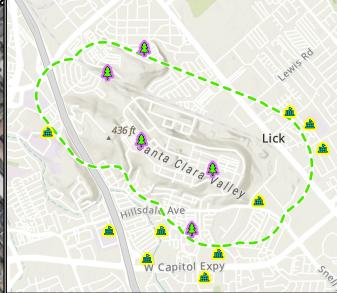
- Date the Elevated Reading Notification Form was completed and submitted to the Air District;
- Name, phone number, email address, and signature of the person who completed the form;
- Sample identification number(s);
- Monitor identification number(s) and/or location(s);
- Sample date(s);
- Analytical results;
- Date the analytical results were reported;
- Probable root cause analysis indicating the activities that occurred on-site the day of the elevated reading that most likely contributed to the results in question;
- Description of the mitigation measures employed at the site on the day of the elevated reading;
- "Additional mitigation measures" that will be implemented to address the probable causes of the elevated level(s) and avoid future elevated levels;
- The effective date of each "additional mitigation measure"; and
- Site plan showing the approximate location of the monitor(s) that registered the elevated readings and the location of the activities that most likely contributed to the results in question.

On and after the effective dates specified in each Elevated Reading Notification Form, the "additional mitigation measures" described in each form shall be required at all times for the activities in question (including future activity of the same type) until all monitors within the monitoring network are less than 0.016 s/cm³.

The Developer shall create and maintain a written log of all "additional mitigation measures" that are implemented at the site. The log shall identify and describe each "additional mitigation measure" and specify the actual date of implementation. The log shall be always maintained on-site for the duration of the Project, and it shall be retained for at least seven years following completion of the Project.

FIGURES





LEGEND

APPROXIMATE BOUNDARY

NOA SAMPLE LOCATIONS 2006-2009 (ATTACHMENT B)

1/4 MILE BUFFER

▲ SCHOOL/DAYCARE

PARK/RECREATION

SITE LOCATION AND SETTING

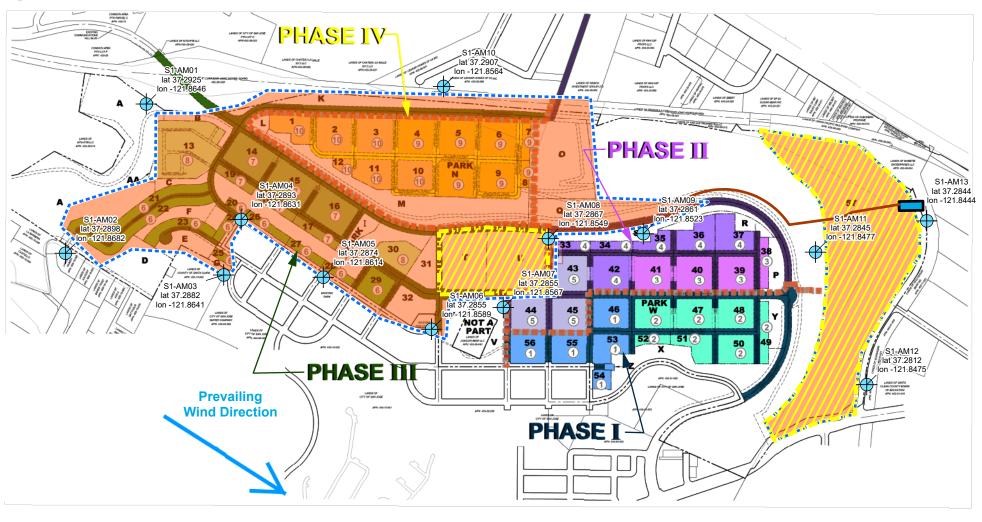
Communications Hill 2
San Jose, California

FIGURE 1

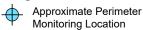
RAMBOLL US CONSULTING, INC.
A RAMBOLL COMPANY







Legend



Former Monitoring Location

Active Construction Area¹

Haul Route Track Out Control

Material Storage and Stockpile Area (subject to ADMP requirements)

CONSTRUCTION LOGISTICS MAP (Stage 1)

Communications Hill

FIGURE 2

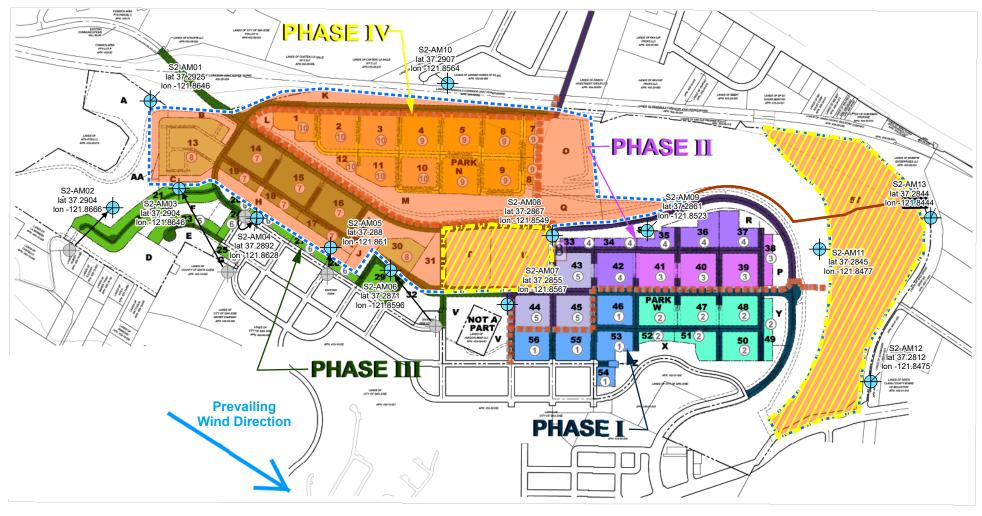
RAMBOLL US CONSULTING INC. A RAMBOLL COMPANY



¹Active Construction Area includes areas to be cleared or graded, trenching areas, excavation sites, and on-site parking lots for the construction team.

San Jose, California





Legend **CONSTRUCTION LOGISTICS MAP** Haul Route Approximate Perimeter (Stage 2) Track Out Control Monitoring Location Former Monitoring Location Material Storage and Stockpile Area (subject to ADMP requirements) Active Construction Area

Communications Hill

FIGURE 3

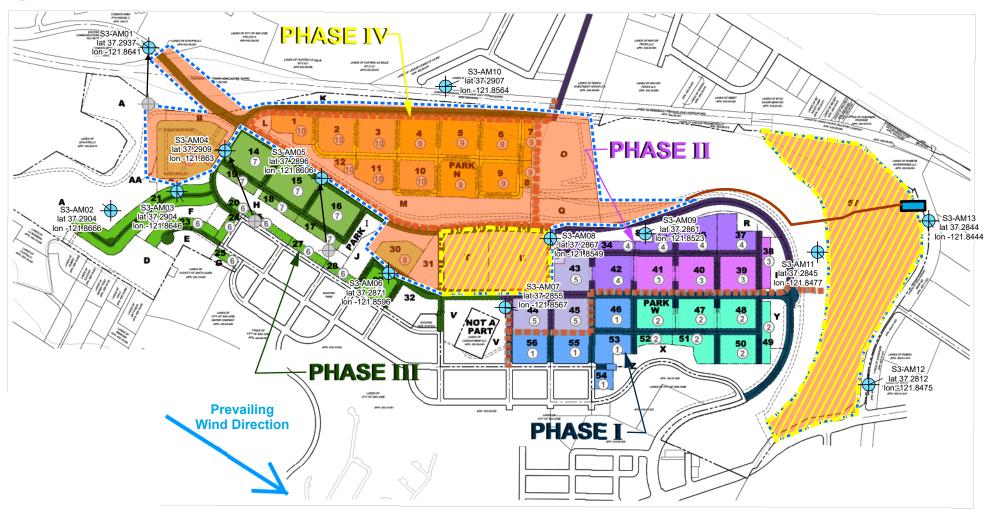
RAMBOLL US CONSULTING INC. A RAMBOLL COMPANY



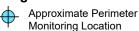
¹Active Construction Area includes areas to be cleared or graded, trenching areas, excavation sites, and on-site parking lots for the construction team.

San Jose, California





Legend



Former Monitoring Location

Material Storage and Stockpile Area (subject to ADMP requirements)

Haul Route

Track Out Control

Communications Hill San Jose, California

CONSTRUCTION LOGISTICS MAP (Stage 3)

RAMBOLL US CONSULTING INC. A RAMBOLL COMPANY

RAMBOLL

FIGURE 4

Active Construction Area¹ ¹Active Construction Area includes areas to be cleared or graded, trenching areas, excavation sites, and on-site parking lots for the construction team.



FIGURE 5

RAMBOLL US CONSULTING INC. A RAMBOLL COMPANY

RAMBOLL

¹Active Construction Area includes areas to be cleared or graded, trenching areas, excavation sites, and on-site parking lots for the construction team.

San Jose, California

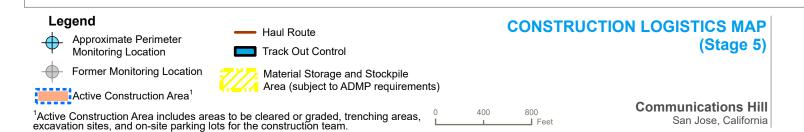
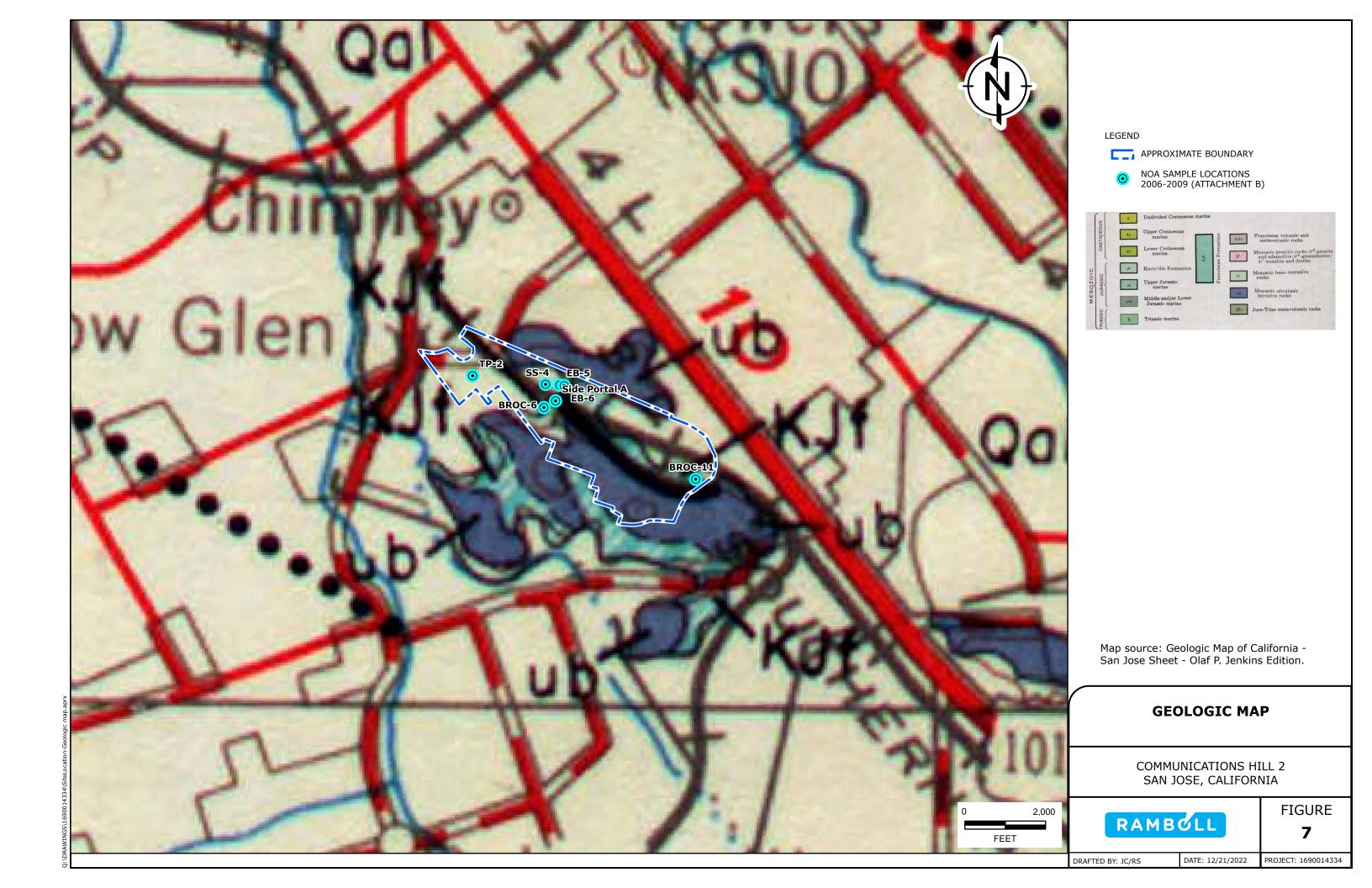


FIGURE 6

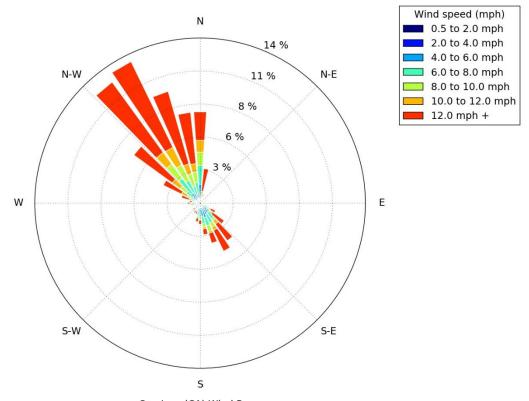
RAMBOLL US CONSULTING INC.
A RAMBOLL COMPANY

RAMBOLL

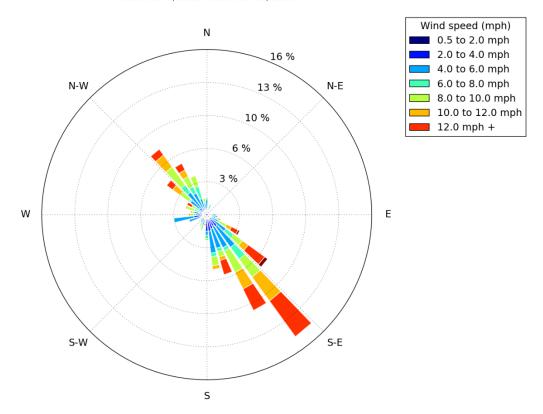


ATTACHMENT A
WIND ROSES FROM SAN JOSE AIRPORT
(DECEMBER 2021 THROUGH DECEMBER 2022)

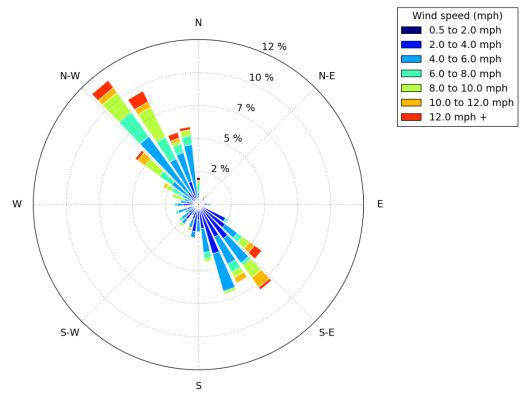
San Jose (CA) Wind Rose December 1, 2021 - December 31, 2022



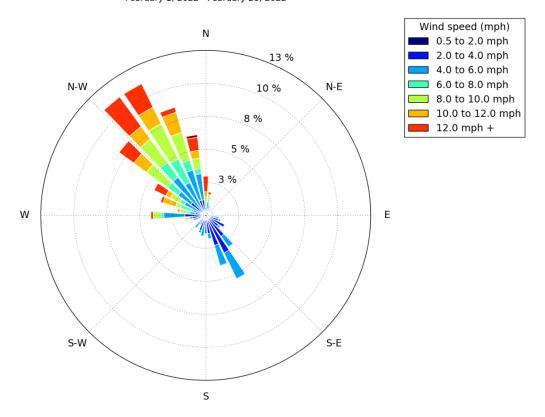
San Jose (CA) Wind Rose
December 1, 2021 - December 31, 2021



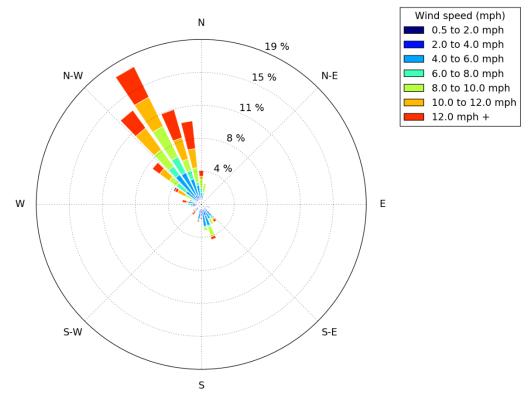
San Jose (CA) Wind Rose January 1, 2022 - January 31, 2022



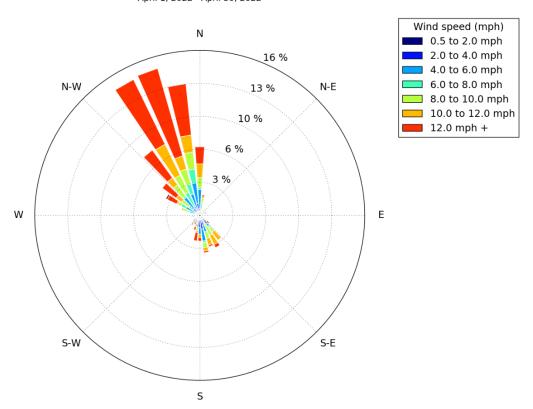
San Jose (CA) Wind Rose February 1, 2022 - February 28, 2022



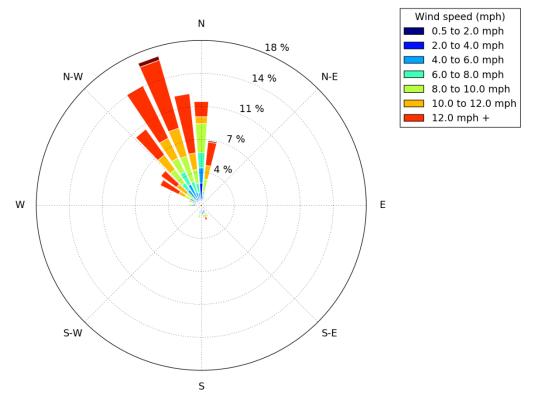
San Jose (CA) Wind Rose March 1, 2022 - March 31, 2022



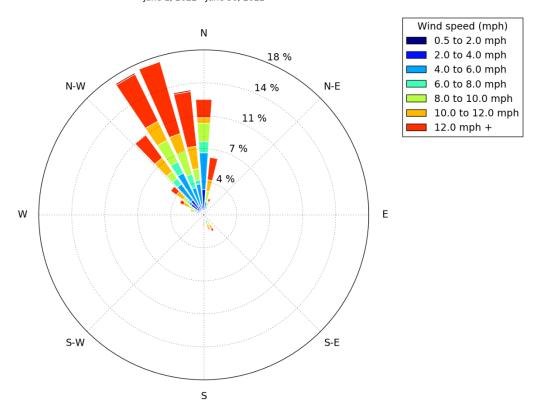
San Jose (CA) Wind Rose April 1, 2022 - April 30, 2022



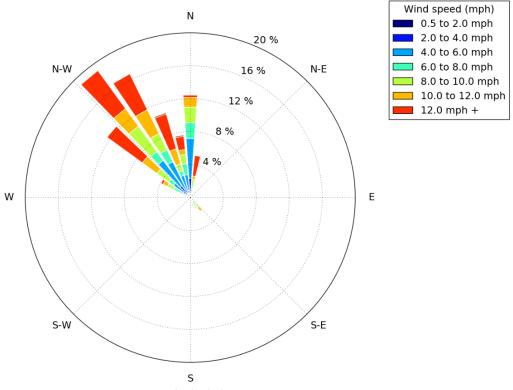
San Jose (CA) Wind Rose May 1, 2022 - May 31, 2022



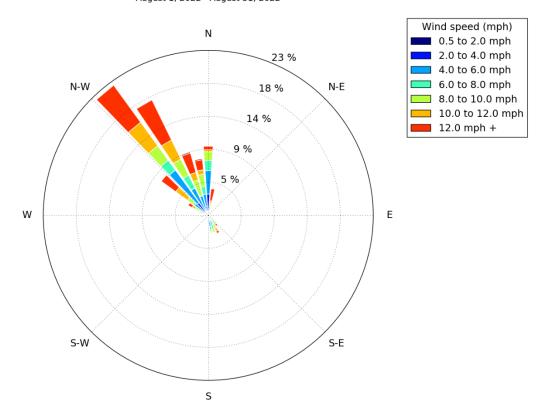
San Jose (CA) Wind Rose June 1, 2022 - June 30, 2022



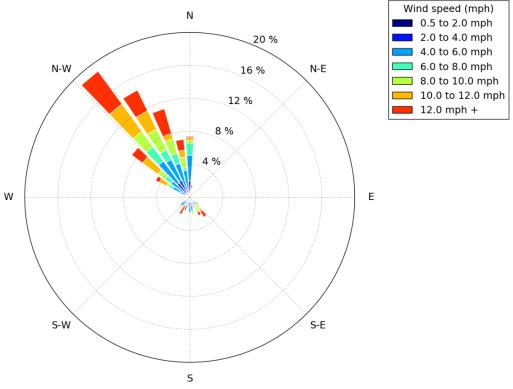
San Jose (CA) Wind Rose July 1, 2022 - July 31, 2022



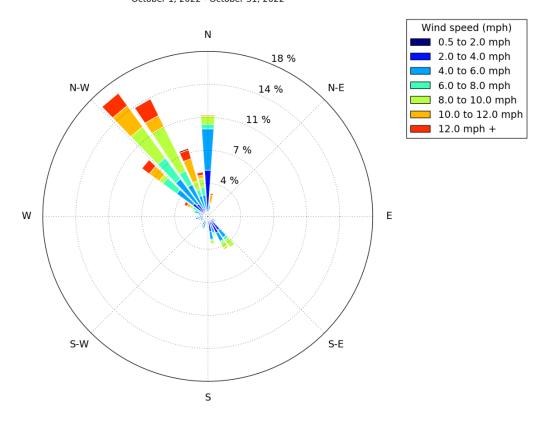
San Jose (CA) Wind Rose August 1, 2022 - August 31, 2022



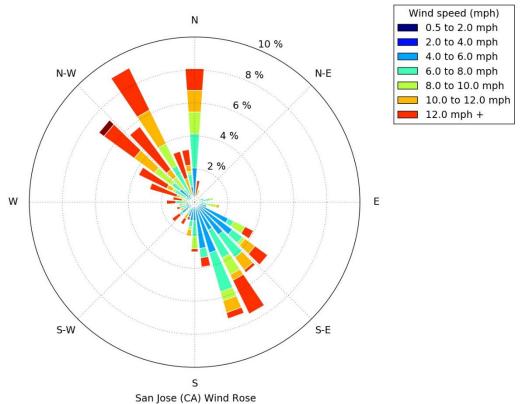
San Jose (CA) Wind Rose September 1, 2022 - September 30, 2022



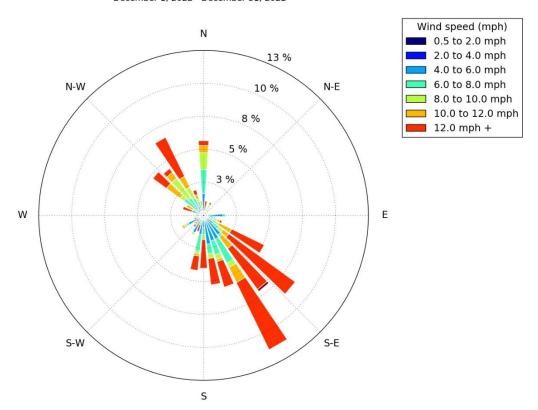
San Jose (CA) Wind Rose October 1, 2022 - October 31, 2022



San Jose (CA) Wind Rose November 1, 2022 - November 30, 2022



December 1, 2022 - December 31, 2022



Asbestos Dust Mitigation Plan (Rev. 5) Communications Hill 2, Phases III and IV San Jose, California

ATTACHMENT B HISTORICAL SAMPLING RESULTS FOR NATURALLY OCCURRING ASBESTOS

Table 6. Analytical Results of Naturally-Occurring Asbestos

(concentrations in percent)

Sample	Polarized Light Microscopy	Transmission Electron Microscopy
SS-4	11.25	
BROC-6	20-30 ¹	
BROC-11	20-30 ¹	
Side Portal A	20-30 ¹	
TP-2	20-30 ¹	
EB-5 Composite (9' and 13.5')		0.002
EB-6 @ 14'	1	0.003
BAAQMD	0.:	25
DTSC Screening Level	0.25%	≤25% of Samples >0.01%

Indicates that the compound was not detected at or above stated laboratory detection limits

BAAQMD
Bay Area Air Quality Management District
DTSC Screening Level
DTSC School Division screening concentration
Estimated percentage due to high numbers of fibers

- Not analyzed

Bold Indicates exceedance of regulatory threshold

NOTES:

TP-2 was collected in 2006 by TRC Lowney as part of a Geotechnical and Geologic Feasibility Study. Other samples collected in 2009 by SES as part of a Phase II Environmental Site Assessment. Sample locations analyzed for NOA are included on Figure 1 of the 2019 ADMP.

Table Source:

Strategic Engineering & Science (SES). 2009. Phase II Environmental Site Assessment Report, Communications Hill, San Jose, CA. May 8.



ASBESTOS TEM LABORATORIES, INC.

Polarized Light Microscopy Analytical Report (EPA Gravimetric Point Count Protocol)

<u>Laboratory Job # 1219-00030</u>

630 Bancroft Way Berkeley, CA 94710 (510) 704-8930 FAX (510) 704-8429

Accredited by
U.S. Dept. of Commerce

NVLAP LAB CODE 101891-0
CA DOHS ELAP

ASBESTOS TEM LABORATORIES, INC

Feb/11/2009

Tom McCloskey Strategic Engineering & Science (SES) 110 11th Street, 2nd Floor Oakland, CA 94607

RE:

LABORATORY JOB # 1219-00030

Polarized light microscopy analytical results for 5 bulk sample(s).

Job Site: Communication Hill

Job No.: 64

Enclosed please find the bulk material analytical results for one or more samples submitted for asbestos analysis. The analyses were performed in accordance with EPA Method 600/R-93/116 or 600/M4-82-020 for the determination of asbestos in bulk building materials by polarized light microscopy (PLM) using the point counting technique to determine asbestos concentration. Please note that while PLM analysis is commonly performed on non-friable and fine grained materials such as floor tiles and dust, the EPA method recognizes that PLM is subject to limitations. In these situations, accurate results may only be obtainable through the use of more sophisticated and accurate techniques such as transmission electron microscopy (TEM) or X-ray diffraction (XRD).

Prior to analysis, samples are logged-in and all data pertinent to the sample recorded. The samples are checked for damage or disruption of any chain-of-custody seals. A unique laboratory ID number is assigned to each sample. A hard copy log-in sheet containing all pertinent information concerning the sample is generated. This and all other relevant paper work are kept with the sample throughout the analytical procedures to assure proper analysis.

Each sample is opened in a class 100 HEPA negative air hood. An aliquot of the material is separated from the sample, weighed, placed into a ceramic crucible of known weight, and ashed in a muffle furnace at ~480 Deg. C for a minumum of 4 hours. The ashed material is reweighed to determine the amount of material lost on ignition. Acidified water is added to the sample to dissolve any calcareous materials, and the sample is placed into a pyrex beaker with additional distilled water and ultrasonicated to break up the solid material as much as possible. The reamining particulate in the beaker is emplaced onto a 0.22um pore size filter of know weight using a vacuum filtration process. The filter is dried and then wighed to determine the remaining undissolved mass of particulate. The filter residue is then analyzed by PLM as described below.

A representative sampling of the material is selected and placed onto a glass microscope slide containing a drop of refractive index oil. The glass slide is placed under a polarizing light microscope where standard mineralogical techniques are used to analyze the various materials present, including asbestos. Quantitation of asbestos is made via counting of a minimum of 400 semi-random particles using a Chalkey reticle. The data is then compiled into standard report format and subjected to a thorough quality assurance check before the information is released to the client.

Sincerely Yours,

P. me Buil

Lab Manager

ASBESTOS TEM LABORATORIES, INC.

--- These results relate only to the samples tested and must not be reproduced, except in full, without the approval of the laboratory. This report must not be used to claim product endorsement by NVLAP or any other agency of the U.S. Government. ---

POLARIZED LIGHT MICROSCOPY POINT COUNT ANALYTICAL REPORT

5

0

Page: 1 of 1

Contact: Tom McCloskey

Samples Submitted:

Report No.

075069

Address: Strategic Engineering & Science (SES) Samples Analyzed:

Date Submitted: Feb-04-09

110 11th Street, 2nd Floor

Date Reported:

Feb-11-09

Oakland, CA 94607

Job Site / No. Communication Hill

64

SAMPLE ID	POINTS LCOUNTED	ASBESTOS		LOCATION / DESCRIPTION
	COUNTED	%	ТҮРЕ	
BROC-6		20-30%	Chrysotile	Bedrock No Point Cout Performed - ARB Exception II
Lab ID # 1219-00030-001	- Total			
SS-4	45	11.25%	Chrysotile	Soil
Lab ID # 1219-00030-002	400 - Total	Points		a a
BROC-11		20-30%	Chrysotile	Bedrock
Lab ID # 1219-00030-003	- Total	Points		No Point Count Performed - ARB Exception II
BROC-10		20-30%	Chrysotile	Bedrock
Lab ID # 1219-00030-004	- Total	Points		No Point Count Performed - ARB Exception II
TP-2		20-30%	Chrysotile	Bedrock
Lab ID # 1219-00030-005	- Total	Points		No Point Count Performed - ARB Exception II
Lab ID#	- Total	Points		
Lab ID#	- Total	Points		
Lab ID#	- Total	Points		
Lab ID#	- Total I	Points		-
Lab ID#	- Total P	Points		+

OC Design	Yulia	Grozman
QC Reviewer_	1.3	

Analyst.



Ph:(510)704-8930 Fax:(510)704-8429 Ph:(775)359-3377 Fax:(775)359-2798

630 Bancroft Way, Berkeley, CA 94710 1350 Freeport Blvd. Unit 104, Sparks, NV 89431

Contact Information				Project Information					
Company: 555					Job Site: Communitate Hill				
	190	ray						•	
Phone: (925)	186-7	1701			Job No:	64			
Address:					P.O. No:				
A1-1- D	- t t		,						
Analysis Requested (C				☐ TEM-AH	ED.		12. 41		
PLM-Carb			td. pt. ct. IIOSH 7400	☐ TEM-AH		☐ TEM-EPA Qu			drinking water vell/surface water
Lead AA-paint c			cassettes	☐ AA-dust		AA-soil	antitative		A-drinking water
□Other:									Turning Water
				100					
Reporting Method (check on	e or mara)		Send invo	ico:			Turnara	und Time	(check one)
phone:	e or more)		n/a, pre	- And Street Control of the Control				s/RUSH	48hrs/2days
☐ fax:			☐ fax:	paid			8 hr		delirs/2days
Memail: + MECLOSE	- 0 5		□ email:	***			24 h		6-10 days
mail	MUCON		□ mail				Othe		U 6-10 days
☐ FTP/post online	IN CON	INCI	☐ FTP/pos	et online					
	-70	1	<u> ПЕТРИО</u>	St Offille					
	Date/Time			100			*		Total Volume/Area
Sample ID	Collected		Location/Des	cription					(air/wipe samples)
BROL-6	01/07/	09	Bedro	4					
55-54	1		Soil	65.5					
BROC - 11	1.4		Bala	1					
0100-10	14		- ((.					
15100-10	11		Bedro	our_					
772-1			Bedr	ode					
						300			

							1875 St. 2015		
Reliquished By:					Received				
Name/Company/ 5 E	5				Name/Com	pany: MICH	AEL 7	. 100	ATEM
Signature: / husto	-	OA			Signature:	This	,	/	
Date/Time: 2/4/09	2:48	D#4			Data/Time:	The state of the s			

ASBESTOS TEM LABORATORIES, INC.

SAMPLE RECEIPT and LOGIN C	HECKLIST	
Client: S.E.S. (1219)	Login Number:	75069
Project: 64 / Communication HILL		
Sample Receipt		
By: initial	Date:	2/4/09
Did samples arrive with a shipping bill (airbill etc.)?	Yes	No
If yes, enter name of courier and airbill #:		
Were custody seals present and intact?	Yes	No
If yes, enter name and date on custody seal:		
Did COC forms accompany samples?	Yes	No
Were the COC forms filled out correctly?	Yes	No
Did you sign and date the COC forms in the correct place?	Yes	No
Was the project identifiable from the COC forms? If yes, enter project mane on top of this form.	Yes	No
Were bulk and air samples received separately?	Yes	No
Was the client contacted about discrepancies? If yes, give details below:	Yes	(No)
Who was contacted?By:		Date:
Notes:		
Cample Login		
Sample Login		-/11/00
By: Yell (initial)	Date:	2/4/07
	to de camer	LES IN PLANTIC BA
Describe packing material (i.e. vermiculite, polysterene)		
Were samples sealed in separate bags?	Yes	No
Did samples arrive intact and unbroken?	Yes	No (iii)
Were sample custody labels present and intact?	Yes	(N)
Were sample labels complete (date,time, initials)?	Yes	(6M)
Did sample labels agree with COC?	Yes	No
Was the client contacted about discrepancies? If yes, give details below:	Yes	No
Who was contacted? MSG FOR TOM McCLOSKEY By:	Turo	Date: 2-4-09
Notes: REQUESTED CLIENT CALL TO CONFIRM	ANALYSIS 4	408 SITE-
HE ALSO LISTED I SAMPLE INCORRECTLY	SO I WEDAY	ED THE COC
ACCOFONGLY.		
	f sample receipt.	



Ph:(510)704-8930 Fax:(510)704-8429

Ph:(775)359-3377 Fax:(775)359-2798 630 Bancroft Way, Berkeley, CA 94710 1350 Freeport Blvd. Unit 104, Sparks, NV 89431

Contact Information Project Information			oject Information					
Company: 555				Job Site:	commu	ribil	Lee +	4:11
Contact: Ton	M Worlay						•	,
Phone: (925)-	786-770			Job No:	64			
Address:				P.O. No:				
Analysis Requested	(check one or more	9)						
Asbestos M-star		td. pt. ct.	□ тем-ан	ERA	☐ TEM-EPA Qu	alitative	Птем-	drinking water
PLM-Car		NIOSH 7400	☐ TEM-Yar		☐ TEM-EPA Qu			well/surface water
Lead AA-paint	chips	cassettes	☐ AA-dust	wipes	☐ AA-soil			A-drinking water
□Other:								
Reporting Method (check o	ne or more)	Send invo	ice:			Turnar	ound Time	(check one)
phone:		n/a, pre	-paid			<4l	rs/RUSH	48hrs/2days
☐fax:		☐ fax:				□ 8 H	nrs	days
Memail: +meclos	key & Ses	☐ email:				24	hrs	6-10 days
∐ mail	inconline	☐ mail				Oti	ner:	
☐ FTP/post online	Net	☐ FTP/pos	st online					
	Date/Time							
Sample ID		Location/Des	crintian					Total Volume/Area
BO 01 -1	111							(air/wipe samples)
0000	1 7	Bedroo	1					
55-54	11	Soil						
BKOC - 11		Books	ock					
Bloc-10	14	Bedro	ele.					
TP-2	71	Besto	-14					
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122			3/10/2					
Reliquished By:		***************************************		Received E	Rv.			
Name/Company/ 5 &	= <					20		-/-
////	1/1				pany: MICH	rel 7	T. LEE	/ATEM
Signature:	to			Signature:	mil			
Date/Time: 2/4/09	2:48 pm			Date/Time:	0.2-04-0	00:00:	48 REV	0

ASBESTOS TEM LABORATORIES, INC.

SAMPLE RECEIPT and LOGIN CH	IECKLIS I	
Client: S.E.S. (1219)	Login Number:	75069
Project: 64 / COMMUNICATION HILL		
Comple Bessint		
Sample Receipt		1.60
By: Initial	Date:	2/4/09
Did samples arrive with a shipping bill (airbill etc.)?	Yes	No
If yes, enter name of courier and airbill #:		
Were custody seals present and intact?	Yes	(No)
If yes, enter name and date on custody seal:		
Did COC forms accompany samples?	Yes	No
Were the COC forms filled out correctly?	Yes	No
Did you sign and date the COC forms in the correct place?	Yes	No
Was the project identifiable from the COC forms? If yes, enter project mane on top of this form.	Ves	No
Were bulk and air samples received separately?	Yes	No
Was the client contacted about discrepancies? If yes, give details below:	Yes	® (No
Who was contacted?		Date:
Notes:		
Sample Login		1.1.
By: (Initial)	Date:	2/4/09
(initial)	,-,,,,,	2/4/09
	PLM-SAND	2/4/09 LES IN PLASTIC EAG
(initial)	PLM-SAMP	2/4/09 LES IN PLANTIC BAG No
(initial) Describe packing material (i.e. vermiculite, polysterene)	PLM-SAND	
(initial) Describe packing material (i.e. vermiculite, polysterene) Were samples sealed in separate bags?	PLM-SAMP	No
(initial) Describe packing material (i.e. vermiculite, polysterene) Were samples sealed in separate bags? Did samples arrive intact and unbroken?	PLM-SAMP Yes	No No
(initial) Describe packing material (i.e. vermiculite, polysterene) Were samples sealed in separate bags? Did samples arrive intact and unbroken? Were sample custody labels present and intact?	PLM-SAMP Yes Yes	No No
(initial) Describe packing material (i.e. vermiculite, polysterene) Were samples sealed in separate bags? Did samples arrive intact and unbroken? Were sample custody labels present and intact? Were sample labels complete (date, time, initials)?	PLM-SAMP Yes Yes Yes	No No No No
(initial) Describe packing material (i.e. vermiculite, polysterene) Were samples sealed in separate bags? Did samples arrive intact and unbroken? Were sample custody labels present and intact? Were sample labels complete (date, time, initials)? Did sample labels agree with COC? Was the client contacted about discrepancies? If yes, give details below:	PLM-SAMP Yes Yes Yes Yes	No No No No
(initial) Describe packing material (i.e. vermiculite, polysterene) Were samples sealed in separate bags? Did samples arrive intact and unbroken? Were sample custody labels present and intact? Were sample labels complete (date, time, initials)? Did sample labels agree with COC? Was the client contacted about discrepancies? If yes, give details below:	PLM-SAMP (Yes) Yes Yes Yes Yes Yes	No No No No No No No Date: 2-4-09
(initial) Describe packing material (i.e. vermiculite, polysterene) Were samples sealed in separate bags? Did samples arrive intact and unbroken? Were sample custody labels present and intact? Were sample labels complete (date, time, initials)? Did sample labels agree with COC? Was the client contacted about discrepancies? If yes, give details below: Who was contacted? MSG FOR TOM McCLOSKEY By:	PLM-SAMP (Yes) Yes Yes Yes Yes Yes Yes	No No No No No No Date: 2-4-09
(initial) Describe packing material (i.e. vermiculite, polysterene) Were samples sealed in separate bags? Did samples arrive intact and unbroken? Were sample custody labels present and intact? Were sample labels complete (date,time, initials)? Did sample labels agree with COC? Was the client contacted about discrepancies? If yes, give details below: Who was contacted? MSC FOR TOMMCCLOSKEY By: Notes: Requested Cultureall To Company	PLM-SAMP (Yes) Yes Yes Yes Yes Yes Yes	No No No No No No Date: 2-4-09

TRANSMISSION ELECTRON MICROSCOPY ANALYTICAL REPORT

(Contact:	Tom McClosky	Chris Vortin				REPORT NO	<u>075307</u>		
,	Address:	Stratogic Engine	2nd Floor	ncc (SES)			Date:	Fcb-23-09		
		Oakland, CA 94					Date Received:	Feb-18-09		
J	ob Site / No.	Communication 064-01	HIII			Tota	al Samples Analyzed	1		
						SAM	PLE DESCRIPT	ION		
(Client San	nple#	EB5 @ 9'			Comp	osite for one ana	lysis		
1	Laboratory S	ample # 1219-00	031-001							
	SAMPLE PREPARATION PARAMETERS									
	Weight of Material Suspended (mg): 76.9 Filter Type & Porc Size MCE 0.22um									
Volume of Suspension Water (ml): 500 Effective Filter Area (sq.mm) 201						201				
	Volume	of Suspension Filt	ered (ml):	0.5						
	ASBESTOS DETECTED IN SCAN AREA CHRYSOTILE AMPHIBOLE FIBERS BUNDLES FIBERS BUNDLES					CALCULATED ASBESTOS CONCENTRATION (WEIGHT %) CHRYSOTILE AMPHIBOLE TOTAL				
Г					ı					
	8	1	NSD	NSD		0.002	< 0.001	0.002		
				COMM	IEN	TS				
ſ	Chrysotile As	bestos Detected				Filter Loading:	Moderate			
						SAED Photo ID No	95.			
	TEM / ANALYTICAL PARAMETERS									
Gnd	Op # Scani	ned For Bundles _	10	Grid Op. Arca (sq.m	m) 0.0099	Bundle Scan Area (se	2.mm) 0.099		
		ned For Fibers _					Fiber Scan Area (sq.r			
				Magnification		18.000X				
		NOTATION KEY	1				he March	,		
Chrus	- Chrysotile	Ashcetos	lum = 1 micn	on = 0.001 mm			a Marit	0 4 59		

Amph. - Amphibole Asbestos 1 mm = 1 millimeter

1 um = 1 micron = 0.001 mm

NSD - No Structures Detected

1 sq.mm = 1 square millimeter

Non-Asb. - Non-Ashestos

l cc = 1 cubic contimeter

Analyst Signature

F me Bail

Lab QC Reviewer Signature

ASBESTOS TEM LABORATORIES, INC. www.asbestostemlabs.com

630 BANCROFT WAY, BERKELEY. CA 94710 (510) 704-8930 With Offices in Reno, NV (775) 359-3377



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Company Club 5 C		Joh Cita.	75 (1)
Company: Strategic Engineer + Sui Contact: Tom McClaskey / Chris Vi	ence Inc	Job Site: Communic	Allen Hill
Phone: 5/0, 45/, 1761	er to	Job No: 064-01	
Address: 110 Eleventh Street, 2	Flor Oakbard CA	P.O. No:	
TO ERROLL SINCE	99607	i io: ito:	
Asharta Saut Saut			
	sid, pt. ct. TEM-Al- NIOSH 7400 TEM-Ye		
Lead AA-paint chips AA-al	r cassettes AA-dust		GF-AA-drinking water
□Other:			
_phone:	☐n/a, pre-paid		48hrs/RUSH 48hrs/2days
Afax: 610.461.1150	□fax.		☐8 hrs 3-5 days
Memail: †mcclaskey a ses inc online	□email:		24 hrs 6-10 days
Tridii	□ mail		Other;
FTP/post online	☐FTP/post online		
		CHARLES TO RES	
E85 a 9' 1/21/09			(
E354135' 1/21/07) Composi	te tor one	analysis
EB60 H 1/21/09	Auglian	te for one discrete, No	12.1-54
	Argigia .	113 - 14 12 100	carrente
Name/Company Back (- L.	- (2)	All and the second seco	15 -1
Name/Company: John Locker	- 163		461 T. CRE/498M
		Signature: Carry	3
Date/Time:		Date/Time:	

TRANSMISSION ELECTRON MICROSCOPY ANALYTICAL REPORT

Conta	ct. Tom McClosko	y/ChrisVertin				REPORT NO	075309		
∧ddro	Strategic Engine		ncc (SES)			Date	Fcb-23-09		
101.00	Oakland, CA 94					Date Received	Fcb-18-09		
Job Sit		AIII			Tot	al Samples Analyzed	1		
					SAM	IPLE DESCRIPT	TION		
Clien	t Sample # E	B6 @ 14'			Analyze	discrete, no com	posite		
Labora	alory Sample # 1219-00	032-001							
		SAN	IPLE PREPA	ARA:	TION PARAMI	ETERS			
w	Weight of Material Suspended (mg): 63 Filter Type & Pore Size MCE 0.22um								
Vo	olume of Suspension Wa	500		Effective Fi	ltcr Area (sq.mm)	201			
Vo	Volume of Suspension Filtered (ml): 0.5								
	ASBES DETECTED IN CHRYSOTILE ERS BUNDLES	SCAN AR AMPH	IBOLE		CALCULATED ASBESTOS CONCENTRATION (WEIGHT %) CHRYSOTILE AMPHIBOLE TOTAL				
	6 1	NSD	NSD		0.003	<0.001	0.003		
			COMM	IENT	'S				
Chryso	tile Asbestos Detected			1	Filter Loading:	Moderate			
					SAED Photo ID No	8.			
				_					
	-	TEM / A	NALYTICA	L PA	RAMETERS				
Grid Op. #	Grid Op. # Scanned For Bundles 10 Grid Op. Area (sq.mm) 0.0099 Bundle Scan Area (sq.mm) 0.099								
Grid Op. #	Scanned For Fibers	1	Grid Op. Area (Fiber Scan Area (sq.m			
			Magnification		18,000X	tool Sean Allea (sq.n	iii)		
	NOTATION KEY				(
hrys Chry	sotile Asbestos 1	um = 1 microi	n = 0.001 mm				7		

Amph. - Amphibole Asbestos 1 mm = 1 millimeter Non-Asb. - Non-Asbestos

NSD - No Structures Detected | 1 sq.mm = 1 square millimeter 1 cc = 1 cubic centimeter

Analyst Signature

Frue Ruis

Lah QC Reviewer Signature

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ASBESTOS TEM LABORATORIES, INC 630 BANCROFT WAY, BERKELEY, CA. 94710 (510) 704-8930 With Offices in Reno. NV (775) 359-3377



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Company Strategic Engineer + Su	ence Inc	Job Site: Communice	tion Hill	
Contact: Tom Mc Closkey / Chris V	ertin			
Phone: 510, 451,1761		Job No: 064-01		
Address: 110 Eleventh Street 2	of Flor Oakbard CA	P.O. No:		
The state of the s	99607			
	ad. pl. d. TEM-AHE			rinking water
	NIOSH 7400 TEM-Yam			relifsurface water
Lead AA-paint chips AA-a	r casselles AA-dust w	pes AA-soil	□ GF-AA	-drinking water
phone:	□n/a, pre-paid		C4hrs/RUSH	48hrs/2days
XJax: 610.451.1150	☐fax:		8 hrs	3-5 days
Memail: +maclaskey a ses inc online.	□email:		24 hrs	6-10 days
mail net	□mail		Other:	10 7
FTP/post online	☐FTP/post online		-	
E85 9 9' 1/21/09				
E35e135 1/21/09) Composit	e for one c	walfils	
EB60 14 1/21/09	Auch and	e for one o	1 1 ===	1
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lame/Company 7- 1 / 1	15.			
ignature: Ton Milosky	- 555 N	ame/Company: MICHA	EL 7. CEZ/	478M
ignature: Tom MULA	Si	gnature: This	/-	
ate/Time:		ate/Time:		
		02 16 0	9961 35 BCV	