

December 2, 2021 Project No. 2101-0252

California State Lands Commission 100 Howe Avenue, Suite 100 South Sacramento, California 95825-8202

- Attention: Mr. Eric Gillies Assistant Chief - Environmental Planning and Management
- Subject: Report of Findings Asbestos and Lead-Based Paint Survey, PRC 421 Decommissioning Project, Pier Access Road, Goleta, Santa Barbara County, California

Dear Mr. Gillies:

Padre Associates, Inc. (Padre), on behalf of California State Lands Commission (CSLC), completed an asbestos survey of the partially exposed, wrapped 6-inch diameter steel pipeline located along the pier access road, as well as a lead-based paint (LBP) survey of the support structure associated with Piers 421-1 and 421-2 at PRC 421 Decommissioning Project Site, Goleta, Santa Barbara County, California (Project Site). The location of the Project Site is presented on Plate 1 – Site Location Map.

OVERVIEW

Padre, on behalf of CSLC, conducted an asbestos survey of the exterior wrap on the single, 6-inch diameter steel pipeline partially exposed along the pier access road, as well as a LBP survey of the support structure associated with Piers 421-1 and 421-2 at the Project Site. The survey activities were conducted on November 23, 2021 to identify exterior pipeline wrap materials that may contain potential asbestos construction materials and LBP surface coatings, which would require special handling, disposal, or personal protective measures and procedures during planned removal, demolition, or deconstruction activities at the Project Site.

This survey was completed to identify any Asbestos-Containing Material (ACM) under the U.S. EPA National Emission Standards for Hazardous Air Pollutants (NESHAP) regulations (40 CFR Part 61, Subpart M) and the California Occupational Safety and Health Administration (Cal / OSHA) regulations (CCR Title 8, Section 1529), or Regulated Asbestos Containing Materials (RACM) under NESHAP, or Asbestos Containing Construction Materials (ACCM) under Cal / OSHA regulations.

Padre collected a total of four (4) bulk samples from the suspect asbestos materials, which were submitted to SGS Forensic Analytical Laboratories, Inc. (SGS Forensic) located in Hayward, California for microscopic analyses of asbestos using polarized light microscopy (PLM) by U.S. EPA method 600/R-93/116. SGS Forensic is accredited by the American Industrial Hygiene Association (AIHA), the National Voluntary Laboratory Accreditation Program (NVLAP), and the California Department of Public Health (Cal DPH). SGS Forensic was also instructed by Padre to



microscopically analyze any bulk samples that were indicated to contain "Trace" concentrations of asbestos as a result of the PLM analyses, utilizing the 1,000 Point Counting method to further quantify indicated asbestos concentrations.

Additionally, Padre collected two (2) surface coating samples (paint chip samples) at the Project Site, which were submitted to SGS Forensic for chemical analyses for the presence of total lead by U.S. EPA method 7082

The results of the PLM analyses for the presence of asbestos indicated that none of the four (4) bulk samples collected from the Project Site contained asbestos in excess of the laboratory reporting limits. Therefore, the four (4) bulk material samples were not further analyzed by the 1,000 Point Counting Method for quantification of asbestos concentrations.

The analytical results of the chemical analysis for the presence of total lead indicated that neither of the two (2) paint chip samples collected from the Project Site contained total lead at concentrations in excess of the analytical method reporting limits of 60 parts per million (ppm). Therefore, neither of the two (2) paint chip samples exceeded the California Lead in Construction Standard limit of 600 ppm for use as objective data in initial employee assessment demonstration, in accordance with Cal / OSHA Lead Construction Safety Orders, 8 CCR 1532.1.

Laboratory analytical results for the presence of asbestos are summarized in Table 1 – Asbestos Survey Results Summary Table. Photographic documentation of the sample locations is presented in Attachment 1 – Site Photographs. Field notes are presented in Attachment 2 – Field Notes. Laboratory analytical results completed by Forensic and Chain of Custody documentation are presented in Attachment 3 - Analytical Results and Chain-of-Custody Documentation.

Asbestos Survey Results Summary Table

Table 1 summarizes the asbestos material survey results conducted at the Project Site, and is provided as a reference to help identify ACM, RACM or ACCM; the location of the materials; the friability of the material; the material type; asbestos concentration; and the estimated quantity of the material.

Sample ID	Description / Location of Sample	Friable	Material	Asbestos Percent	Estimated Quantity
112321- ELLWOOD- A1	The sample was collected from the exposed portion of the 6-inch diameter pipeline along the west side of the pier access road, 50-ft west of the gate.	NA	Black Pipe Wrap and Mastic	ND	NA
112321- ELLWOOD- A2	The sample was collected from the exposed portion of the 6-inch diameter pipeline along the west side of the pier access road, 50-ft west of the gate.	NA	White Pipe Wrap and Mastic	ND	NA

Table 1 – Asbestos Survey Results Summary Table



Sample ID	Description / Location of Sample	Friable	Material	Asbestos Percent	Estimated Quantity
112321- ELLWOOD- A3	The sample was collected from the exposed portion of the 6-inch diameter pipeline along the west side of the pier access road, 50-ft west of the gate.	NA	Black Pipe Wrap and Mastic	ND	NA
112321- ELLWOOD- A4	The sample was collected from the exposed portion of the 6-inch diameter pipeline along the west side of the pier access road, 50-ft west of the gate.	NA	White Pipe Wrap and Mastic	ND	NA

Note: ND = Not Detected at or in excess of the laboratory reporting limit. NA = Not Applicable.

LBP Survey Results Summary Table

Table 2 summarizes the results of the LBP survey completed by Padre at the Project Site. A description of the sample is provided as a reference to help identify LBP surface coatings, the color of the surface coating, the condition of the surface coating, and the total lead concentration in the surface coating. All of the identified surface coatings reported to contain total lead concentrations in excess of the California Lead in Construction Standard Limit of 600 ppm are **bolded**.

 Table 2 – LBP Survey Results Summary Table

Sample ID	Location of Sample	Color	Condition	Lead in Paint (PPM)	Estimated Quantity (ft²)
112321- ELLWOOD- L1	The paint sample was collected from the support structure associated with Pier 421-1.	White / White	Some Flaking	<60	600
112321- ELLWOOD- L2	The paint sample was collected from the support structure associated with Pier 421-2.	White / White	Some Flaking	<60	600

Note: ft² = Square Feet

PPM= Parts Per Million.

ASBESTOS RESULTS

The results of the asbestos survey completed by Padre at the Project Site on November 23, 2021, as well as a review of the PLM analytical results completed by Forensic, did not indicate the presence of asbestos at, or in excess of the laboratory reporting limit in any of the four (4) bulk material samples collected. Therefore, the four (4) indicated bulk material samples were not further analyzed by the 1,000 Point Counting Method for quantification of asbestos concentrations.



LEAD-BASED PAINT RESULTS

The chemical analyses of the neither of the two (2) paint chip samples collected at the Project Site indicated the presence of total lead at concentrations at, or in excess of, the laboratory reporting limits of 60 ppm. Therefore, the two (2) paint chip samples were not indicated to contain total lead concentrations in excess of the California Lead in Construction Standard Limit of 600 ppm for use as objective data in initial employee assessment demonstration.

RECOMMENDATIONS

All applicable state of California and federal rules and regulations should be followed to protect workers, site personnel, local residents, the community, and the environment during the course of deconstruction, maintenance, renovation, demolition, disposal, or recycling activities in accordance with state of California, Cal / OSHA, federal OSHA and U.S. EPA / NESHAP rules and regulations.

Additional suspect asbestos or LBP materials may be discovered at the Project Site during the course of the planned activities that were not evident, visible, or within the scope of work at the time that this inspection and survey was completed. If suspect construction materials are encountered, then those materials should be assumed to contain asbestos at concentrations above regulatory action limits until objectively determined otherwise.

LIMITATIONS AND ASSUMPTIONS

This asbestos survey letter report has been prepared for the sole benefit of CSLC. No other persons may rely on the findings of this report without the expressed written consent of CSLC and Padre.

In performing our professional services, we have attempted to apply present engineering and scientific judgment and use a level of effort consistent with the standard of practice measured on the date of work and in locale of the Project Site for similar type studies. Padre makes no warranty, expressed or implied.

Based on the nature of the survey and the sample collection techniques utilized, assumptions regarding the homogenous nature of bulk materials and access to the areas in question have been made. No warranty can be made regarding the content or condition of any materials that are physically or visually inaccessible.

During the course of the survey and sample collection activities, every attempt was made to survey all physically and visually accessible suspect materials, within the scope of this survey at the Project Site. The following areas were not accessible, or were determined to be out of scope at the time of the survey:

- Any materials or equipment that may be below the ground and / or water surface are out of the scope of this survey; and
- Additional pipeline material that were not visible or accessible at the time of this survey.

It is possible that additional asbestos and LBP materials may exist that were not accessible, visible or apparent at the time of the survey. This survey includes only those materials that were included in the scope of this survey. If suspect materials are discovered during the



course of the planned activities that have not been included in this survey, then those materials should be assumed to be present at concentrations above regulatory action limits until objectively determined otherwise.

The analyses and interpretations presented in this report have been developed based on the results from the review of existing information pertaining to the Project Site and the results from the laboratory analyses of the subject materials.

Padre's estimated quantities of construction and building materials or surface coatings are provided as an estimate of the materials present at the time of the survey, within the subject scope of work. The estimated quantities are not specific to individual components but are provided as an estimate of the quantities of a homogeneous material. Estimated quantities are not intended to be used by abatement contractors for bidding purposes, and all estimated quantities should be independently verified by others before further use.

CLOSURE

If you have any questions or require additional information, please contact Mr. Scott Santala at (805) 786-2650, extension 123, or ssantala@padreinc.com.

Sincerely,

PADRE ASSOCIATES, INC.

Andrew H. Park, CAC 18-6331 Project Manager

Scott S. Santala, CAC 09-4494 Senior HES Manager

AHP:SSS:JKS:ap

- Plates: Plate 1 Site Location Map Plate 2 – Site Sampling Plan
- Attachments: Attachment 1 Site Photographs Attachment 2 – Field Notes Attachment 3 – Analytical Report and Chain-of-Custody Documentation



PLATES







ATTACHMENT 1 SITE PHOTOGRAPHS





Asbestos Survey Partially Exposed 6-Inch Diameter Steel Pipeline along Pier Access Road PRC 421 Decommissioning Project, Goleta, Santa Barbara County, California





112321-ELLWOOD-A1 Black Pipe Wrap and Mastic (No Asbestos Detected)



112321-ELLWOOD-A2 White Pipe Wrap and Mastic (No Asbestos Detected)



112321-ELLWOOD-A3 Black Pipe Wrap and Mastic (No Asbestos Detected)



112321-ELLWOOD-A4 White Pipe Wrap and Mastic (No Asbestos Detected)





Lead-Based Paint Survey Piers 421-1 and 421-2 PRC 421 Decommissioning Project, Goleta, Santa Barbara County, California



112321-ELLWOOD-L1 Pier 421-1 White Paint (<60 PPM Total Lead)



112321-ELLWOOD-L2 Pier 421-2 White Paint (<60 PPM Total Lead)

Notes: PPM = Part Per Million



ATTACHMENT 2 FIELD NOTES

padre

ASBESTOS	Field	Form
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Sample ID	Time	Location / Fu	unctional Space	Туре	Qty (ft ²)	Friable (Y/N)	Comments / Condition	Photo ID
112321 -	1400	Gin pl a nuess rond	ylong pier 1,50-ft	Black wap Wmastic	10LF	N		
- AZ	1405	West of	In the brush	white way	Bapase			
1 " - A3	1410			WAI				
- A4	1415	Ø	/	W/AZ	V	\checkmark		
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ample ID	Time	Location	Color / Layers	Condition	Qty (ft ²)	Comments	Photo IC
12321- -Uw00D-	1420	Pier 421-1 Support structure	white	Some	600		
-12	1425	Pler 421-2 support structure	White		600		
		2					



ATTACHMENT 3 ANALYTICAL REPORT AND CHAIN-OF-CUSTODY DOCUMENTATION



Bulk Asbestos Analysis

(EPA Method 40CFR, Part 763, Appendix E to Subpart E and EPA 600/R-93-116, Visual Area Estimation)

NVLAP Lab Code: 101459-0

Padre Associates, Inc. Project Manager 1861 Knoll Drive Ventura, CA 93003					Client ID: Report Number Date Received Date Analyzed Date Printed: First Reported	L1185 er: B32593 : 11/29/2 l: 11/29/2 11/29/2 l: 11/29/2	7 1 1 1 1
Job ID/Site: 2102-0252 - ELLWOOD					SGSFL Job II Total Samples	D: L1185 Submitted:	4
Date(s) Collected: 11/23/2021					Total Samples	Analyzed:	4
Sample ID	Lab Numbe	Asbestos r Type	Percent in Layer	Asbestos Type	Percent in Layer	Asbestos Type	Percent in Layer
112321-ELLWOOD-A1 Layer: Yellow Non-Fibrous Material Layer: Black Tar	12502223		ND ND				
Total Composite Values of Fibrous Con Cellulose (Trace)	nponents:	Asbestos (ND)					
112321-ELLWOOD-A2 Layer: Yellow Non-Fibrous Material Layer: Black Tar	12502224		ND ND				
Total Composite Values of Fibrous Con Cellulose (Trace)	nponents:	Asbestos (ND)					
112321-ELLWOOD-A3 Layer: Black Non-Fibrous Material Layer: Black Tar	12502225		ND ND				
Total Composite Values of Fibrous Con	nponents:	Asbestos (ND)					
112321-ELLWOOD-A4 Layer: Black Non-Fibrous Material Layer: Black Tar	12502226		ND ND				
Total Composite Values of Fibrous Con	nponents:	Asbestos (ND)					

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Tad Thrower, Laboratory Supervisor, Hayward Laboratory

Note: Limit of Quantification ('LOQ') = 1%. 'Trace' denotes the presence of asbestos below the LOQ. 'ND' = 'None Detected'.

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lient Name/Account #: Padre Associa	ites, Inc.								Sampler:	Andy Park, CAC 18-6331
Address: 369 Pacific St	reet									
City/State/Zip: San Luis Obis	po, California 93	401								
Telephone Number: 805 786 2650					Fa	x No.: 805.	786.2651		Invoice To:	Padre Associates, Inc.
Project No / Name: 2102 -	0252/	FII	Woo	D						1861 Knoll Drive
Laboratory Eorensic				-	10					Ventura, CA 93003
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12221 CILLWARD 41	11/2/21		5.0		Plastic	1.				1400
12521-ELLWOOD-111	1/23/21	1	DUIK	np	1	Ŷ				1405
12321-ELLWOOD-AZ						\diamond	+			1903
12321 - ELLWOOD - A3						X				1410
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Please combine results and COC	into one final po	df docu	iment w	hen e-	mailed					24 Hours
Perform NESHAP 1,000 point count	on any sample th	at is ind	dicated w	ith "Tra	ce" asbe	stos concen	trations by PL	.M method.		48 Hours
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Metals Analysis of Paints (AIHA-LAP, LLC Accreditation, Lab ID #101762)

Padre Associates, Inc.					Client ID:	L1185
Project Manager					Report Num	ber: M237869
1861 Knoll Drive					Date Receive	ed: 11/29/21
					Date Analyz	ed: 11/29/21
Ventura, CA 93003					Date Printed	l: 11/29/21
					First Report	ed: 11/29/21
Job ID / Site: 2102-0252 - EI	LLWOOD				SGSFL Job	ID: L1185
Date(s) Collected: 11/23/21					Total Sampl	es Submitted: 2
					Total Sampl	es Analyzed: 2
Sample Number	Lab Number	Analyte	Result	Result Units	Reporting Limit*	Method Reference
112321-ELLWOOD-L1	30898123	Pb	< 60	ppm	60	EPA 3050B/7000B
112321-ELLWOOD-L2	30898124	Pb	< 60	ppm	60	EPA 3050B/7000B

* The Reporting Limit represents the lowest amount of analyte that the laboratory can confidently detect in the sample, and is not a regulatory level. The Units for the Reporting Limit are the same as the Units for the Final Results.

Cevin Poon

Kevin Poon, Laboratory Analyst, Hayward Laboratory

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Note* Sampling data used in this report was provided by the client as noted on the associated chain of custody form.



adre		(CHAIN OF C	JSTODY REC	ORD		Page of
Client Name/Account #: Padre Ass	ociates, Inc.			1		Sampler	: Andy Park,
Address: 369 Pacifi	c Street						
City/State/Zin: San Luis	Obispo, California 93	401					
Telephone Number: 805 786 2	650			Fax No.: 805	.786.2651	Invoice To	: Padre Associates, Inc.
Project No / Name: 2102	- 0252 /	Ellwood				_	1861 Knoll Drive
Laboratory Forensic	00	PIIIICCC		1		_	Ventura, CA 93003
Report To: Scott San	tala (Ssantala@nadre	sinc.com): Andy	Park (apark)	Bpadreinc.com	1)	_	ap@padreinc.com
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Sample ID / Description 12321-ELL4V00D-L 12321-ELLW00D-	Date Sampled	 No. of Containers dip tued Sample Matrix 	Preservative	Total Lead (Pb)			NOTES/TIV 1420 1425
	2						
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Special Instructions: 1. Send all reports to San Luis C 2. Please combine results and C Relinquished by:	Date	s. Invoice to V tf document w	/entura addr hen e-maile Shipped via:	ess. d	9 M H D II	Date Time	Turn Around Time (Check) Same Day 24 Hours 48 Hours 3 Days 5 Days
Relinquished by:	Date	Time	Received by	NDV 2 OV	9 RECT	Date Time	Comments: