The Junipers Project Final Environmental Impact Report SCH No. 2018041032 - Project No. 586670

Appendix K3

Asbestos and Lead-Based Paint Investigation

January 2021



May 21, 2018

Mr. Max Frank Carmel Land LLC 1334 Parkview Avenue, Suite 100 Manhattan Beach, California 90266

RE: Asbestos and Lead-Based Paint Investigation 14455 Pensaquitos Drive San Diego, California 90266 Former Golf Course and Tennis Courts Hillmann Project #: C3-7144

Dear Mr. Frank:

Hillmann Consulting, LLC (Hillmann) was retained by 33North Development Group. (client) to conduct an asbestos and lead-based paint investigation at the above referenced location.

On April 25, 2018, an investigation of the above-referenced location was performed by Mr. Stephen Bartlett, a State of California Certified Site Surveillance Technician (CSST #17-6112) and a State of California Department of Public Health (CDPH) Certified Lead Sampling Technician (#29973), under the direction of Mr. Ryan Terwilliger, a State of California Certified Asbestos Consultant (CAC #11-4776) and CDPH Certified Lead Inspector/Risk Assessor (CLIA #22479) of Hillmann Consulting, LLC. The investigation was performed in order to identify potential asbestos-containing materials and lead-based paint that may be found at the former golf course and tennis courts located at 14455 Pensaquitos Drive.

Asbestos Containing Material (ACM) Investigation

Intrusive methods were utilized during the inspection of the premises for suspect ACM. However, suspect materials may exist within the inspected areas of the Property building that were not accessible during the inspection. Such areas typically include, but may not necessarily be limited to, wall cavities, crawl spaces, and ceiling plenums.

A total of nineteen (19) samples of suspect materials were collected from the former maintenance building and the shed in tennis court area (with 29 layers broken out) and analyzed, per Appendix A, Subpart F, 40 CFR Part 763, Section 1 via Polarized Light Microscopy (PLM), by LA Testing Lab Services located in Huntington Beach, CA. LA Testing is an American Industrial Hygiene Association (AIHA), Environmental Microbiology Laboratory Accreditation Program (EMLAP), and National Voluntary Laboratory Accreditation Program (NVLAP) accredited laboratory.

Your Property. Our Priority.

Corporate Headquarters: 1600 Route 22 East, Suite #107, Union, NJ 07083 (908) 688-7800 Fax: (908) 686-2636 Toll free: (800) 232-4326 Office Locations: New York, Massachusetts, Pennsylvania, Virginia, North Carolina, California, Engineering Division: New Jersey www.HillmannConsulting.com Sampled materials included:

• Vinyl floor tile and associated mastic, roofing materials, penetration mastic, ceiling tiles, plaster, and joint compound.

The results of bulk sample analysis indicate that asbestos-containing materials **are** present in the following materials:

 Table I

 Positive ACM Sample Location Table

Sample & Location	Description	Quantity (Approximate)	Asbestos Content by PLM
A-4, A-5, A-6 / Former Maintenance Shed Roof	Penetration Mastic, Black	30 Ln Ft	5% Chrysotile
A-16, A-17 / Tennis Courts Equipment Shed Roof	Roofing Material	10 SF	5% Chrysotile

If any previously unidentified suspect asbestos-containing materials are encountered during activities that may disturb ACM, all work must stop. The unidentified materials should either be sampled or must be assumed to contain asbestos.

Lead-Based Paint (LBP) Investigation

Currently, the State of California, HUD, and the Environmental Protection Agency (EPA) define lead-based paint as paint or other surface coating with lead content equal to or greater than 1.0 milligram per square centimeter (mg/cm^2) of surface area (via XRF instrumentation) or greater than or equal to 0.5% by weight, 5000 ppm, or 5000 mg/kg. A summary of the findings and recommendations of this report are included below. This summary alone does not constitute the complete screening report

The LBP Inspection was performed through paint chip sampling in general conformance with the 1995 HUD Guidelines for the evaluation and control of LBP hazards in housing (1997 revised Chapter 7 of the HUD guidelines). The subject areas were visually inspected and suspect LBP samples were collected and analyzed by LA Testing, in Huntington Beach, California, using Flame Atomic Absorption Spectrometry (AAS), following EPA Method SW846 3050/7000B.

The purpose of the survey was to identify, sample, analyze and quantify any suspect LBP from the former golf and tennis courts at 14455 Pensaquitos Drive.

Sampled materials included:

• Door frames, doors, walls, floors, and ceilings

Ten (10) samples of suspect lead-based paint (LBP) were collected and included **no** positive LBP:

The results of samples analyzed indicate that lead-based paint was **not** present.

In compliance with Title 17, CCR, Division 1, Chapter 8 and 24 CFR Subtitle A, Part 35.55, Hillmann filed the 8552 Form as required to notify the California Department of Public Health (CDPH) the findings of the LBP Inspection conducted on the Site. A copy of the 8552 form is included in the appendices.

If suspect LBP is discovered during servicing or maintenance related work for which there are no sample documentation/results, Hillmann recommends pursuing one of the following alternatives: (1) Sample and analyze the discovered suspect material(s) to determine whether they contain LBP or, (2) quantify and remove on a unit cost basis.

Conclusion

The results of the asbestos and lead-based paint investigation indicated that ACM **was** identified and LBP was **not** identified at the above referenced structures.

Asbestos-Containing Material

Sample & Location	Description	Quantity (Approximate)	Asbestos Content by PLM
A-4, A-5, A-6 / Former Maintenance Shed Roof	Penetration Mastic, Black	30 Ln Ft	5% Chrysotile
A-16, A-17 / Tennis Courts Equipment Shed Roof	Roofing Material	10 SF	5% Chrysotile

Based on the findings of the asbestos survey, Hillmann offers the following recommendations:

- Analytical results returned that **asbestos was detected** in the samples that were collected indicated in Table 1. The ACM listed in Table 1 is non-friable and in good condition. Before any renovation can take place, the removal of asbestos-containing materials must include consulting services (design and monitoring), and the removal should be performed by a California licensed asbestos abatement contractor and according to all federal, state and local laws governing asbestos.
- If additional impacted suspect **ACBM** or **ACCM** are discovered during renovations, servicing or maintenance related work for which there are no sample documentation/results, Hillmann recommends pursuing one of the following alternatives: Sample and analyze the discovered suspect material(s) to determine whether it contains asbestos; or assume the material(s) to be asbestos-containing materials, quantify and remove on a unit cost basis.

• A copy of this report must be present on-site during any renovation or demolition activities affecting the sampled materials.

This report should be maintained as a permanent maintenance record for the Property.

Please feel free to contact our office at (714) 634-9500, should you have any questions or concerns.

Sincerely,

HILLMANN CONSULTING, LLC

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Ryan Terwilliger West Coast Operations Manager CAC – 11-4776

Attachments: Lab Results

Stoplantlett

Stephen Bartlett Environmental Scientist CSST- 17-6112



Attention: Stephen Bartlett

Hillmann Consulting, LLC 1600 Route 22 East Union, NJ 07083 LA Testing Order: 331809458 Customer ID: HILL50 Customer PO: Project ID:

http://www.LATesting.com / gardengrovelab@latesting.com

Phone:	(908) 688-7800
Fax:	
Received Date:	04/25/2018 3:20 PM
Analysis Date:	04/30/2018
Collected Date:	04/25/2018

Project: C3-7144 33 North Development 14455 Penasquitos Drive

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

			Non-Ast	pestos	Asbestos
Sample	Description	Appearance	% Fibrous	% Non-Fibrous	% Туре
A-01-Shingle 1	Roof Maintenance shed roof - roofing	White/Black/Green Fibrous	5% Glass	95% Non-fibrous (Other)	None Detected
331809458-0001 A-01-Shingle 2	core, black Roof Maintenance shed roof - roofing	Heterogeneous Brown/Black Fibrous	5% Glass	95% Non-fibrous (Other)	None Detected
331809458-0001A	core, black	Heterogeneous			
A-02-Shingle 1	Roof Maintenance shed roof - roofing	White/Black/Green Fibrous	5% Glass	95% Non-fibrous (Other)	None Detected
331809458-0002	core, black	Heterogeneous			
A-02-Shingle 2	Roof Maintenance shed roof - roofing	Brown/Black Fibrous	5% Glass	95% Non-fibrous (Other)	None Detected
331809458-0002A	core, black	Heterogeneous	5% 01		
A-03-Shingle 1 331809458-0003	Roof Maintenance shed roof - roofing core, black	White/Black/Green Fibrous	5% Glass	95% Non-fibrous (Other)	None Detected
	Roof Maintenance	Heterogeneous Brown/Black	5% Glass	95% Non-fibrous (Other)	None Detected
A-03-Shingle 2 331809458-0003A	shed roof - roofing core, black	Fibrous Heterogeneous	J /0 Glass		NONE DELECIEU
A-04	Roof Maintenance	Black		95% Non-fibrous (Other)	5% Chrysotile
331809458-0004	shed roof - penetration mastic, black	Non-Fibrous Homogeneous			
A-05	Roof Maintenance shed roof -	Black Non-Fibrous		95% Non-fibrous (Other)	5% Chrysotile
331809458-0005	penetration mastic, black	Homogeneous			
A-06	Roof Maintenance shed roof -	Black Non-Fibrous		95% Non-fibrous (Other)	5% Chrysotile
331809458-0006	penetration mastic, black	Homogeneous			
A-07-Floor Tile	Office maintenance shed office - 12x12	Gray/White Non-Fibrous		100% Non-fibrous (Other)	None Detected
331809458-0007	vinyl floor tile, paper pattern	Homogeneous			
A-07-Adhesive	Office maintenance shed office - 12x12	Clear Non-Fibrous		100% Non-fibrous (Other)	None Detected
331809458-0007A	vinyl floor tile, paper pattern	Homogeneous			
A-08-Floor Tile	Office maintenance shed office - 12x12	Gray/White Non-Fibrous		100% Non-fibrous (Other)	None Detected
331809458-0008	vinyl floor tile, paper pattern	Homogeneous			
A-08-Adhesive	Office maintenance shed office - 12x12	Clear Non-Fibrous		100% Non-fibrous (Other)	None Detected
331809458-0008A	vinyl floor tile, paper pattern	Homogeneous			
A-09-Floor Tile	Office maintenance shed office - 12x12	Gray/White Non-Fibrous		100% Non-fibrous (Other)	None Detected
331809458-0009	vinyl floor tile, paper pattern	Homogeneous			



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

			Non-Asbes	itos	Asbestos
Sample	Description	Appearance	% Fibrous	% Non-Fibrous	% Туре
A-09-Adhesive 331809458-0009A	Office maintenance shed office - 12x12 vinyl floor tile, paper pattern	Clear Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
A-10-Joint Compound 331809458-0010 Drywall not found in sample	Office maintenance shed office - drywall + jc composite	White Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
A-11 331809458-0011 Drywall not found in sample	Office maintenance shed office - drywall + jc composite	White Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
A-12 331809458-0012 Drywall not found in sample	Office maintenance shed office - drywall + jc composite	White Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
A-13 331809458-0013	Office maintenance shed office - 2x4 ct	Gray/White Fibrous Heterogeneous	40% Cellulose 10% Min. Wool	30% Perlite 20% Non-fibrous (Other)	None Detected
A-14 331809458-0014	Office maintenance shed office - 2x4 ct	Gray/White Fibrous Heterogeneous	40% Cellulose 10% Min. Wool	30% Perlite 20% Non-fibrous (Other)	None Detected
A-15 331809458-0015	Office maintenance shed office - 2x4 ct	Gray/White Fibrous Heterogeneous	40% Cellulose 10% Min. Wool	30% Perlite 20% Non-fibrous (Other)	None Detected
A-16-Shingle	Roof tennis courts shed - roofing core	White/Black Fibrous Heterogeneous	5% Glass	95% Non-fibrous (Other)	None Detected
A-16-Felt 331809458-0016A	Roof tennis courts shed - roofing core	Black Fibrous Homogeneous	70% Cellulose	30% Non-fibrous (Other)	None Detected
A-16-Mastic	Roof tennis courts shed - roofing core	Black Fibrous Homogeneous		95% Non-fibrous (Other)	5% Chrysotile
A-17-Shingle	Tennis courts shed - roofing core	White/Black Fibrous Heterogeneous	5% Glass	95% Non-fibrous (Other)	None Detected
A-17-Felt 331809458-0017A	Tennis courts shed - roofing core	Black Fibrous Homogeneous	70% Cellulose	30% Non-fibrous (Other)	None Detected
A-17-Mastic	Tennis courts shed - roofing core	Black Fibrous Homogeneous		96% Non-fibrous (Other)	4% Chrysotile
A-18 331809458-0018	Floor tennis courts - caulking, white	Gray Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
A-19 331809458-0019	caulking, white	Gray Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected



5431 Industrial Drive Huntington Beach, CA 92649 Tel/Fax: (714) 828-4999 / (714) 828-4944 http://www.LATesting.com / gardengrovelab@latesting.com LA Testing Order: 331809458 Customer ID: HILL50 **Customer PO: Project ID:**

Analyst(s)

Christopher Miranda (29)

ounthe Unan

Michael DeCavallas, Laboratory Manager or Other Approved Signatory

EMSL maintains liability limited to cost of analysis. This report relates only to the samples reported and may not be reproduced, except in full, without written approval by EMSL. EMSL bears no responsibility for sample collection activities or analytical method limitations. Interpretation and use of test results are the responsibility of the client. This report must not be used by the client to claim product certification, approval, or endorsement by NVLAP, NIST or any agency of the federal government. Non-friable organically bound materials present a problem matrix and therefore EMSL recommends gravimetric reduction prior to analysis. Samples received in good condition unless otherwise noted. Estimated accuracy, precision and uncertainty data available upon request. Unless requested by the client, building materials manufactured with multiple layers (i.e. linoleum, wallboard, etc.) are reported as a single sample. Reporting limit is 1%

Samples analyzed by LA Testing Huntington Beach, CA NVLAP Lab Code 101384-0, CA ELAP 1406

Initial report from: 04/30/2018 13:38:16



LA Testing Order: 331809481 CustomerID: HILL65 CustomerPO: ProjectID:

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Attn:	Ryan Terwilliger
	Hillmann Consulting
	1745 West Orangewood Avenue
	Suite 110
	Orange, CA 92868

Phone: Received: Collected:

Fax:

(714) 634-9500 04/25/18 3:20 PM

Project: C3-7144

Test Report: Lead in Paint Chips by Flame AAS (SW 846 3050B/7000B)*

Client SampleDescription	Collected Analyzed	RDL	Lead Concentration
B-1	4/26/2018	0.010 % wt	0.018 % wt
331809481-0001	Site: Maintenace shed ext wall, green, intact, wood		
B-2	4/26/2018	0.043 % wt	<0.043 % wt
331809481-0002	Site: Maintenace shed int wall, beige, intact, wood		
B-3	4/26/2018	0.041 % wt	<0.041 % wt
331809481-0003	Site: Maintenace shed int wall, beige, intact, wood		
B-4	4/26/2018	0.061 % wt	<0.061 % wt
331809481-0004	Site: Maintenace shed int wall, white, intact, wood		
B-5	4/26/2018	0.021 % wt	<0.021 % wt
331809481-0005	Site: Maintenace shed int wall, brown, intact, wood		
B-6	4/26/2018	0.010 % wt	<0.010 % wt
331809481-0006	Site: Tennis court light poles, brown, intact, metal		
B-7	4/26/2018	0.036 % wt	<0.036 % wt
331809481-0007	Site: Tennis court shed, green, intact, wood		
B-8	4/26/2018	0.10 % wt	<0.10 % wt
331809481-0008	Site: Tennis court shed, white, intact, wood		
B-9	4/26/2018	0.049 % wt	<0.049 % wt
331809481-0009	Site: Tennis court floor, red, intact, concrete		
B-10	4/26/2018	0.014 % wt	<0.014 % wt
331809481-0010	Site: Tennis court floor, green, intact, concrete		

michael Chapman

Michael Chapman, Laboratory Manager or other approved signatory

*Analysis following Lead in Paint by EMSL SOP/Determination of Environmental Lead by FLAA. Reporting limit is 0.010 % wt based on the minimum sample weight per our SOP. Unless noted, results in this report are not blank corrected. This report relates only to the samples reported above and may not be reproduced, except in full, without written approval by EMSL. EMSL bears no responsibility for sample collection activities. Samples received in good condition unless otherwise noted. "<" (less than) result signifies that the analyte was not detected at or above the reporting limit. Measurement of uncertainty is available upon request. The QC data associated with the sample results included in this report meet the recovery and precision requirements unless specifically indicated otherwise. Definitions of modifications are available upon request.

Samples analyzed by LA Testing Huntington Beach, CA AIHA-LAP, LLC--ELLAP Accredited #101650, CA ELAP 1406

Initial report from 04/26/2018 17:06:24

itic, CPM =carpet aster, PP =pitch pocke , WB =wallboard,	hing, CFT=ceramic floor tile, CM=carpet mas IT=joint tape, LC=leveling compound, PL=pl VCTM=VCT mastic, VSF=vinyl sheet flooring E WRITTEN OUT	we base, CBM=cove base mastic, CF=curb flas wall tile, FP=fireproofing, JC=joint compound, . ar paper, VB=vapor barrier, VCT=vinyl floor tile, ass line ALL OTHER DESCRIPTIONS MUST B	lashing, BUR=built-up roofing, CB=cc g tile, CTM=CT mastic, CWT=ceramic glass panel, SP=soundproofing, TP=tr I = pipe fitting insulation, FG = fibergl	Material Codes AP=acoustical plaster, BC=brown coat, BF=base flashing, BUR=built-up roofing, CB=cove base, CBM=cove base mastic, CF=curb flashing, CFT=ceramic floor tile, CM=carpet mastic, CPM=carpet padding mastic, CPT=carpet tile mastic, CT=ceiling tile, CTM=CT mastic, CWT=ceramic wall tile, FP=fireproofing, JC=joint compound, JT=joint tape, LC=leveling compound, PL=plaster, PP=pitch pocket, PPW=parapet wall flashing, RFP=re-inforced fiberglass panel, SP=soundproofing, TP=tar paper, VB=vapor barrier, VCT=vinyl floor tile, VCTM=VCT mastic, VSF=vinyl sheet flooring, WB=wallboard, WPA=wall paper adhesive, PI = pipe insulation, PFI = pipe fitting insulation, FG = fiberglass line ALL OTHER DESCRIPTIONS MUST BE WRITTEN OUT
Access Issues?				CB2
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NOG. SAMPLES	DUB#: 03-7144	NJ 07083	es, 1600 Route 22 East, Union, NJ 07083 ail: @hillmanngroup.com	Environmental Consulting & Lab Services, 1600 Route 22 East, Union, NJ 07083 (908) 688-7800 Fax (908) 686-2636 email: @hillmanngroup.com
	DATE: 4/25/18	BULK SAMPLE IDENTIFICATION FORM PLM COC, Version 3.3		HILLMANN CONSULTING

52



Lead (Pb) Chain of Custody EMSL Order ID (Lab Use Only): #33180948

LATESTING **520 MISSION STREET** SOUTH PASADENA, CA 91030 PHONE: (800) 303-0047 FAX: (323)-254-9982

Company: Hillmann Consult	EMSL-Bill to: Same Different If Bill to is Different note instructions in Comments**						
Street: 1745 W. Olayewood A	Venue, Site 110	Thi	ird Party B	lling requires written	author	ization from th	ird party
City: Olanye State/P	rovince: CA	Zip/Posta				country:	
Report To (Name): Ryun Terwillig	Pr	Telephon	e #:			_	1.
Email Address: r Herwilliger @hillmi		Fax #:	2		P	Purchase Or	der:
Project Name/Number: (3 ~ 714	y Jon Cont		ovide Re	sults: 🗌 Fax	□ En		
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Air	NIOSH 7082	2	Flame A	tomic Absorption		4 µg/filter	
	NIOSH 7105	5	Graph	ite Furnace AA	0.	03 µg/filter	
	NIOSH 7300 mod	dified	ICP-AES/ICP-MS		0	.5 µg/filter	
Wipe* ASTM non ASTM	SW846-7000	В	Flame A	tomic Absorption	1	0 µg/wipe	
non ASTM *if no box is checked, non-ASTM	SW846-6010B c	or C	60	ICP-AES	1.	0 µg/wipe	
Wipe is assumed	SW846-7000B/7	010	Graph	ite Furnace AA	0.0	75 µg/wipe	
TCLP	SW846-1311/7000B/S	SM 3111B	Flame A	tomic Absorption	0.4	mg/L (ppm	
24.2	SW846-1131/SW846-6	6010B or C		ICP-AES		mg/L (ppm)	
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and a subscription of the set of the set	SW846-7010 SW846-6010B c			ite Furnace AA ICP-AES		mg/kg (ppm	
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Preserved with $HNO_3 pH < 2$	EPA 200.7	and the second	ICP-AES 0.0			0 mg/L (ppr	
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Preserved with $HNO_3 pH < 2$	EPA 200.8			ICP-MS	0.00	1 mg/L (ppm)
TSP/SPM Filter	40 CFR Part 5		ICP-AES			2 µg/filter	
	40 CFR Part 5	50	Graph	Graphite Furnace AA 3.6 µg/filter			
Other:	1.1					~	
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Received (Lab):	WF) Date:	41-	5	Time:		3:201	em
Comments: CCK/istine Savon	(0)				an	reparts	lindbices

Page 1 of _____pages



LEAD (Pb) CHAIN OF CUSTODY EMSL ORDER ID (Lab Use Only): #331809481

LATESTING 520 MISSION STREET SOUTH PASADENA, CA 91030 PHONE: (800) 303-0047 FAX: (323)-254-9982

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

Sample #	Location	Volume/Area	Date/Time Sampled
8-6	Tennis court light Poles, man	, Intact, Bon metul	
B-7	TENNIS COULT She E, yreen,	Intact, Wood	
8-8	Tranis Coult Shee, white,	Intart, dwood	
B-9	TEAN'S COULT Shee, yreen, TEAN'S COULT Shee, white, TEAN'S COULT Shee, white, TEAN'S COULT FLOOR, (et, inthe TEAN'S COULT FLOOR, green	act, conjete	
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Comments/S	pecial Instructions:		
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Page 2 of 2 pages