



**ANALYSIS OF BROWNFIELD CLEANUP
ALTERNATIVES**

Former Berkeley Building
887 Fulton Street
Fresno, California 93721

December 5, 2025

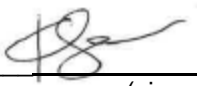
Prepared for:
City of Fresno
2600 Fresno Street, Room 3076
Fresno, California 99201

Prepared by:
Stantec Consulting Services Inc.
601 SW 2nd Avenue, Suite 1400
Portland, Oregon 97204


Project Number: 203724380

USEPA Brownfields Revolving Loan Fund
Grant
Agreement No. 4B98T50501
Property ID: 266678


This document entitled **Analysis of Brownfield Cleanup Alternatives – Former Berkeley Building, 887 Fulton Street, Fresno, California 93721** was prepared by Stantec Consulting Services Inc. (“Stantec”) for the account of the City of Fresno (the “Client”). Any reliance on this document by any third party is strictly prohibited. The material in it reflects Stantec’s professional judgment in light of the scope, schedule and other limitations stated in the document and in the contract between Stantec and the Client. The opinions in the document are based on conditions and information existing at the time the document was published and do not take into account any subsequent changes. In preparing the document, Stantec did not verify information supplied to it by others. Any use which a third party makes of this document is the responsibility of such third party. Such third party agrees that Stantec shall not be responsible for costs or damages of any kind, if any, suffered by it or any other third party as a result of decisions made or actions taken based on this document.

Prepared by  _____
(signature)

Kristin Stout

Reviewed by  _____
(signature)

David Holmes

Reviewed by  _____
(signature)

Graeme Taylor, Project Manager

Table of Contents

1	INTRODUCTION	1
1.1	Subject Property Location and Description.....	1
1.2	Subject Property History.....	1
2	REGULATED BUILDING MATERIALS RESULTS SUMMARY	2
2.1	Asbestos Containing Materials Findings.....	2
2.2	Lead-Based Paint Findings.....	4
2.3	Inventory of Materials Requiring Special Handling	4
3	APPLICABLE REGULATIONS AND CLEANUP STANDARDS	5
3.1	Cleanup Oversight Responsibility.....	5
3.2	Applicable Cleanup Standards for Key Contaminants	5
3.3	Laws and Regulations Applicable to Cleanup.....	5
4	EVALUATION OF CLEANUP ALTERNATIVES	7
4.1	Remedial Action Objective.....	7
4.1.1	Asbestos-Containing Materials, Lead Based Paint, and Mold	7
4.2	Cleanup Alternatives Considered	7
4.2.1	Alternative 1: No Abatement Alternative.....	7
4.2.2	Alternative 2: Encapsulation/Enclosure	8
4.2.3	Alternative 3: Complete Abatement of ACM/LBP/Mold – Roof Repair/Replacement.....	8
4.3	Cleanup Alternative Evaluation.....	9
4.3.1	Effectiveness	9
4.3.2	Ability to Implement	10
4.3.3	Costs	11
4.3.4	Green Remediation Considerations.....	12
4.4	Recommended Cleanup Alternative.....	13
5	REFERENCES	1

LIST OF TABLES:

Table 2.1: Asbestos Containing Materials and Locations

Table 2.2: Lead Paint Samples and Locations

FIGURES:

FIGURE 1 – SUBJECT PROPERTY LOCATION MAP

FIGURE 2 – SUBJECT PROPERTY PROJECT AREA MAP

LIST OF APPENDICES

APPENDIX A	PROPOSED BUILDING RENOVATION PLANS
APPENDIX B	UNDATED PROPERTY FLOOR PLAN
APPENDIX C	REGULATED BUILDING MATERIALS SURVEY REPORTS
APPENDIX D	COST ESTIMATE FOR ALTERNATIVES 2 AND 3



1 Introduction

This Analysis of Brownfield Cleanup Alternatives (ABCA) was prepared for the City of Fresno for the Berkeley Building property located at 887 Fulton Street, Fresno, California 93721 (the “Subject Property”). The purpose of the ABCA is to present options and costs for the abatement of regulated building materials (RBM) (i.e., asbestos-containing materials [ACM] and lead-based paint [LBP]) identified during the completion of an *Asbestos Survey* and *Lead Based Paint Survey* on behalf of the Fresno Area Hispanic Foundation on October 29, 2024 and July 22, 2025, respectively. The redevelopment plans for the 0.26-acre Subject Property includes repair and renovation of the existing building as necessary for planned use for commercial retail space, office space and as a community center. The second floor will be used as offices for small businesses and entrepreneurs. A draft proposed building renovation plan is included in Appendix A.

1.1 Subject Property Location and Description

The Subject Property is comprised of a 0.26-acre parcel identified by Fresno County Assessor Parcel Number (APN) 468-282-21T. The parcel owner is listed as the Successor Agency to the Redevelopment Agency who has a Disposition and Development Agreement with the Fresno Area Hispanic Foundation. The Subject Property is occupied by a vacant two-story former commercial department store building. Adjacent properties are a mix of commercial buildings, vacant land, a park, and railroad tracks and spurs.

A Subject Property location map is provided as **Figure 1**. A Subject Property area map illustrating the main features of the Subject Property is provided as **Figure 2**.

1.2 Subject Property History

In July 2024, Krazan & Associates, Inc. (Krazan) completed a Phase I environmental site assessment (ESA) to document environmental conditions on the Subject Property (Krazan, 2024). Krazan reported that the Subject Property was first developed during or prior to 1898 as a blacksmith, machine shop, and lodging. By 1906, the Subject Property was occupied by a machine works building, a woodworking building, and a building labeled “agricultural implements.” By 1918, the Subject Property was occupied by a printing machine shop, a machine shop, five stores, a restaurant, and other enterprises. By 1948, the Subject Property was occupied by five stores, a dancing school, a furniture facility, a storage facility, and an electric shop. The present-day building was constructed in the early 1960s as a department store (the Former Berkeley’s Department Store) but has mostly been vacant since 1982. An undated floor plan of the building from its time as a department store including the basement, 1st floor, and 2nd floor is included in Appendix B. At the time of the Phase I ESA reconnaissance, the Subject Property building was not in use.



2 REGULATED BUILDING MATERIALS RESULTS SUMMARY

On October 29, 2024 and July 22, 2025, an *Asbestos Survey* and *Lead-Based Paint Survey* were completed by Krazan on behalf of the Fresno Area Hispanic Foundation. Sampling for the Asbestos Survey was completed at the Subject Property on October 14, 2024, and included the collection of 62 samples of suspect ACM materials. Sampling for the Lead-Based Paint Survey was completed on July 10, 2025, and included the collection of 31 paint samples. Copies of both reports are included in Appendix C.

2.1 Asbestos Containing Materials Findings

Suspect ACM materials identified during the onsite survey conducted by Krazan were grouped and classified as homogeneous materials based on their appearance, usage, and age of the building. Representative samples of each homogeneous material were sampled in accordance with federal regulations. ACM was identified in 17 of the 62 samples collected, including the following materials:

- Texture
- 9x9 floor tile and mastic
- Sheet vinyl flooring and mastic
- Pipe elbow
- Roof core
- Roof mastic
- Vent pipe (assumed)

ACM was detected in trace amounts in the following:

- Gypsum board / taping material

No ACM was detected in the following materials:

- Plaster
- Skim coat
- Wallpaper
- 12x12 ceiling tile
- 2x4 ceiling panel
- Stair tread



Analysis of Brownfield Cleanup Alternatives

2 REGULATED BUILDING MATERIALS RESULTS SUMMARY December 5, 2025

- Ceiling tile mastic
- Base cove mastic
- Paneling mastic
- Ducting tape
- Pipe insulation wrap
- Stucco
- Roof tar
- Terrazzo flooring

Table 2.1 below presents a sample number, material description, sample location, the ACM content, material condition and estimated quantity of the material.

Table 2.1: Asbestos Containing Materials and Locations

SAMPLE NUMBER	MATERIAL DESCRIPTION	SAMPLE LOCATION	ASBESTOS CONTENT	CONDITION	QUANTITY
8	Gypsum Board / taping material	2 nd Floor	Trace	NA	60,000 SF
9	Gypsum Board / taping material	2 nd Floor	Trace	NA	See #8
10	Gypsum Board / taping material	1 st Floor	Trace	NA	See #8
11	Gypsum Board / taping material	1 st Floor	Trace	NA	See #8
12	Gypsum Board / taping material	Basement	Trace	NA	See #8
13	Gypsum Board / taping material	Basement	Trace	NA	See #8
14	Texture	2 nd Floor	4%	Good / Friable	60,000 SF
15	Texture	2 nd Floor	4%	Good / Friable	See #14
16	Texture	1 st Floor	4%	Good / Friable	See #14
17	Texture	1 st Floor	4%	Good / Friable	See #14
18	Texture	Basement	4%	Good / Friable	See #14
19	Texture	Basement	4%	Good / Friable	See #14
33	Brown Streaked 9-in by 9-in Floor tile / mastic	2 nd Floor	4% / 4%	Good / NF	600 SF
34	Gray Streaked 9-in by 9-in Floor tile / mastic	2 nd Floor	5% / 4%	Good / NF	450 SF
35	Tan 9-in by 9-in Floor tile	2 nd Floor	6%	Good / NF	700 SF
36	Tan 9-in by 9-in Floor tile / mastic	2 nd Floor	5% / 4%	Good / NF	75 SF
37	Brown Streaked 9-in by 9-in Floor tile / mastic	1 st Floor	4% / 4%	Good / NF	600 SF
39	Tan 9-in by 9-in Floor tile / mastic	Basement	4% / 4%	Good / NF	800 SF
40	Green Streaked 9-in by 9-in Floor tile / mastic	Basement	4% / 5%	Good / NF	300 SF
49	Pipe elbow	Basement	8%	Good / NF	<50 SF
55	Roof core	Roof	15%	Good / NF	11,000 SF
60	Roof mastic	Roof	8%	Good / NF	<100 SF
62	Brown Streaked 9-in by 9-in Floor tile / mastic	2 nd Floor	4% / 4%	Good / NF	200 SF
-	Vent pipe	Basement	Assumed	Good / NF	75 SF



Analysis of Brownfield Cleanup Alternatives

2 REGULATED BUILDING MATERIALS RESULTS SUMMARY
December 5, 2025

Notes and Abbreviations:

SF = Square Feet; NF = Non Friable

Previously undiscovered asbestos may be present within wall cavities (e.g., asbestos in electrical wire wrapping, insulation materials, vapor barrier paper, etc.), and some underground utility piping has been known to contain asbestos (e.g., transite pipe). If discovered during abatement or renovation, suspect ACMs that are not identified within this report will be assumed positive for asbestos unless additional sampling, analysis, and/or assessment indicates otherwise.

2.2 Lead-Based Paint Findings

The lead-based paint survey consisted of a visual inspection and sampling of painted surfaces throughout the two floors of the building on the Subject Property. The purpose of the inspection was to provide information regarding lead in paint as it pertains to employee exposure and demolition debris disposal. Representative samples of the painted surfaces were collected by Krazan for laboratory analysis. Additional suspect painted surfaces may be present in areas that were inaccessible, unsafe to inspect, or obscured from view during the sampling process. Two of the 31 collected samples contained lead greater than 0.5% (the EPA definition of a lead-based paint) as shown in Table 2.2 below.

Table 2.2: Lead Paint Samples and Locations

SAMPLE NUMBER	COLOR	BUILDING COMPONENT	SUBSTRATE	SAMPLE LOCATION	SQUARE FEET	LEAD CONTENT %
4	Pink	Wall	Gypsum Board	2 nd Floor	400	0.74
20	Pink	Partition Wall	Wood	1 st Floor	200	1.3

2.3 Inventory of Materials Requiring Special Handling

A mold survey was not prepared for the Subject Property; however, openings in the roof and visible mold were observed throughout the Subject Property. There is significant mold and anticipated water damage throughout the building's interior. These materials will require special handling to limit exposure to workers and release to other surfaces. ACMs which have been found in roofing materials (roof core and the roof mastic) and other materials as discussed in Section 2.1. The roof is partially deteriorated and fallen fragments are located throughout the building interior on the floor and on various surfaces where there is also mold present. Therefore, the mold is considered to be comingled with identified ACMs and LBP. Materials to be removed from the building will require special handling for mold, LBP and ACMs and will therefore be managed as asbestos-containing waste materials (ACWMs), unless determined otherwise by sampling.



3 APPLICABLE REGULATIONS AND CLEANUP STANDARDS

3.1 Cleanup Oversight Responsibility

Subject Property cleanup and redevelopment should be conducted in compliance with applicable laws, regulations, and procedures outlined below.

3.2 Applicable Cleanup Standards for Key Contaminants

Cleanup standards for key contaminants at the Subject Property include the following:

Asbestos – Cleanup standard for asbestos are based on the USEPA Asbestos-Containing Materials in Schools, Final Rule and Notice (USEPA, 1987). Although this rule is in place primarily to protect child-occupied facilities, following the guidelines within the rule is encouraged for all building renovations for the overall protection of human health.

LBP – Building materials containing lead in paint or other surface coating material containing lead are defined by the U.S. Department of Housing and Urban Development (HUD) and USEPA as greater than or equal to 5,000 parts per million or 0.5% by weight (HUD, 1997). The cleanup standards are assumed to equal this level.

Mold – The California Department of Public Health (CDPH) does not recommend performing testing for mold, and notes in their frequently asked questions guidance that the focus for mold should be on identifying and addressing sources of moisture that are generally responsible for the growth of mold. There are no specific cleanup standards for mold linked to mold counts or specific species of mold.

3.3 Laws and Regulations Applicable to Cleanup

This section is provided for informational purposes only and the property owner (or contractor implementing the cleanup) is responsible for ensuring compliance with all applicable laws and regulations.

Cleanup activities at the Subject Property should be conducted by contractors operating in accordance with the U.S. Department of Labor Occupational Safety & Health Administration (OSHA) Hazardous Waste Operations and Emergency Response (HAZWOPER) standard codified at 29 Code of Federal Regulations 1910.120. The HAZWOPER standard applies to cleanup operations required by federal, state, local, or other governmental bodies involving hazardous substances. Additionally, the California OSHA “Lead in Construction Standard” codified in Title 8 California Code of Regulations Section 1532.1, is applicable to construction work where an employee may be exposed to lead.

National Emission Standards for Hazardous Air Pollutants (NESHAP) are outlined in the Code of Federal Regulations (CFR) Title 40 Chapter I Subchapter C Part 61 Subpart M. OSHA regulations regarding asbestos exposure during construction activities (i.e., renovation and demolition) are outlined in CFR Title 29 Subtitle B Chapter XVII Part 1926.1101, whereas OSHA regulations regarding respiratory protection are outlined in CFR Title 29 Subtitle B Chapter XVII Part 1910.134. A NESHAP notification form must be



Analysis of Brownfield Cleanup Alternatives

3 APPLICABLE REGULATIONS AND CLEANUP STANDARDS

December 5, 2025

submitted at least 10 working days prior to the beginning of renovation or demolition activities involving ACMs. This notification form must include information regarding the company that performed the ACM survey, the analytical laboratory, the company performing the demolition or renovation activities, the company transporting waste that contains asbestos, and the landfill where the waste that contains asbestos will be disposed.

The Asbestos Hazard Emergency Response Act (AHERA) was designed to address the presence of asbestos in school buildings. AHERA also tasked the USEPA with developing a plan for accrediting individuals responsible for performing asbestos surveys and remediation. AHERA protocols are considered the best industry practice for asbestos surveys and remediation, and these protocols are typically applied to non-school buildings. Although no school buildings are located at the Subject Property, it is recommended that remediation be performed by a company that utilizes AHERA-certified personnel for asbestos demolition and remediation activities. AHERA is outlined in CFR Title 40 Chapter I Subchapter R Part 763 Subpart E.

Permitting for abatement of asbestos in Fresno County is subject to the requirements of the San Joaquin Valley Air Pollution Control District (SJVAPCD). Written notice must be submitted to the SJVAPCD at least 10 working days prior to beginning abatement. During removal, there are required emission control techniques and engineering controls to prevent asbestos fibers from becoming airborne. SJVAPCD will issue permit release forms certifying that the asbestos regulatory requirements have been met. The Subject Property owner and/or contractor are likely to be required to obtain these permit release forms before the local building or demolition permits can be granted

The USEPA has adopted the Renovation, Repair, and Painting (RRP) Rule (40 CFR 745.80) to minimize exposure from LBP dust by training contractors to make sure they follow lead-safe work practices during renovation of a structure. Although this rule is in place primarily to protect child-occupied facilities, following the guidelines within the rule is encouraged for all building renovations for the overall protection of human health. In addition to this rule, contractors are required to follow the HUD Lead Safe House Rule and all local and state specific requirements. The RRP Rule requires that renovators be USEPA-certified, accredited, and follow specific work practices.

The RRP Rule does not apply to the total demolition of structures. It is recommended that a certified lead inspector be on-site to oversee demolition activities and appropriate disposal of materials. Demolition work should be conducted by a lead-certified company trained to handle and dispose of LBP materials.

The Toxic Mold Protection Act of 2001 includes general provisions for disclosure of mold problems and for addressing mold as necessary to guarantee habitable conditions for tenants

Federal laws and regulations applicable to this cleanup include the Small Business Liability Relief and Brownfields Revitalization Act and the Davis-Bacon Act. Federal, state, and local laws regarding procurement of contractors to conduct the cleanup are also applicable. Adherence to laws and regulations associated with abatement and removal of regulated building materials is the responsibility of individual contractors performing cleanup activities.



4 EVALUATION OF CLEANUP ALTERNATIVES

4.1 Remedial Action Objective

4.1.1 ASBESTOS-CONTAINING MATERIALS, LEAD BASED PAINT, AND MOLD

The Remedial Action Objective for ACMs and other hazardous materials at the Subject Property is to prevent these materials from causing unacceptable risk to human health and to allow the Subject Property to be reused as commercial retail space, office space, and a community center. The following formula is commonly used to represent risk:

$$**RISK = EXPOSURE \times CONCENTRATION**$$

As indicated by this common formula, risk can be reduced by limiting exposure or by reducing the magnitude of contaminant concentration. The human exposure pathway of concern for ACMs is inhalation. ACM exposure can be limited by isolating ACMs from human contact or by maintaining ACMs in good condition so that asbestos fibers would not be released into indoor air where exposure via inhalation could occur. The only way to reduce the ACM concentration is to abate the ACMs, which would reduce the concentration to zero. If the concentration is zero, then risk also would be zero.

4.2 Cleanup Alternatives Considered

Three alternatives were considered for the remedial action at the Subject Property: 1) No Abatement; 2) Encapsulation; and 3) Complete Abatement of ACMs. These three options are described below. The cost estimates presented in this document are based on quotes obtained from local vendors and based on professional judgement but should be independently verified and updated based on additional information identified during project implementation. A description of each alternative and the results of the comparative analysis are presented below.

4.2.1 ALTERNATIVE 1: NO ABATEMENT ALTERNATIVE

The No Action Alternative is included as a baseline for comparison to the other proposed alternatives. The No Action Alternative assumes that all ACM, LBP and mold within the building would remain in place.

Under this alternative, the owner must continue to secure the building to eliminate trespassing and also minimize uses of the building that require City employees and others to enter the building as it is considered a hazardous environment.

In order to prevent ACM releases to the exterior areas surrounding the Subject Property building, the building envelope must be maintained. Windows are the most obvious weak link in maintaining the building envelope. As a result, any broken windows should be addressed to maintain a secure building envelope. This might include window replacement or using plywood to “board up” a broken window. This is particularly important if there are known ACMs in poor condition near a broken window.



Analysis of Brownfield Cleanup Alternatives

4 EVALUATION OF CLEANUP ALTERNATIVES

December 5, 2025

Roofing is a significant component of the building envelope and is known to contain ACM. Maintenance and repair will need to continue on the roof to ensure the building envelope does not fail and release ACM to the surrounding environment. The roof is already known to be in a state of disrepair and would need to be replaced or significantly repaired as a component of any redevelopment project. In addition to repair, tarps or other lightweight protective materials could be placed on the roof and weighed down to temporarily protect problem areas from the elements.

Lastly, under the No Abatement Alternative, the Subject Property owner must 1) limit access to the building interiors using security measures, including limiting access by authorized personnel, 2) ensure that the hazards of building entry are properly communicated to authorized personnel that may enter the buildings, and 3) establish an entry protocol for other authorized personnel that may enter the building.

4.2.2 ALTERNATIVE 2: ENCAPSULATION/ENCLOSURE

The encapsulation/enclosure alternative consists of the following activities:

1. Permitting and notifications for ACM, LBP and mold abatement activities.
2. Site preparation by establishing security fencing, drop boxes, decontamination areas, appropriate containment, barrier, and air-filtration systems and other work area preparations necessary for workers in appropriate protective clothing to work in areas subject to mold and ACM.
3. Completion of limited repairs to the roof (primarily focused on addressing the open holes in the roof).
4. Removing interior finishes to expose building structure without removing structural components (posts, beams, joists, etc.).
5. Cleaning and treating all accessible areas with mold using a microbial cleaning agent.
6. Encasing the existing ceiling with a new lower drywall ceiling.
7. Abating known ACM in other areas of the building (not including ACM materials in the ceiling or roof).
8. Disposing of waste at an appropriately licensed landfill under applicable waste manifests at a facility that can receive ACWM, LBP and mold-impacted building materials.

4.2.3 ALTERNATIVE 3: COMPLETE ABATEMENT OF ACM/LBP/MOLD – ROOF REPAIR/REPLACEMENT

This complete abatement option consists of the following activities:

1. Permitting and notifications for ACM, LBP and mold abatement activities.
2. Site preparation by establishing security fencing, drop boxes, decontamination areas, appropriate containment, barrier, and air-filtration systems and other work area preparations necessary for workers in appropriate protective clothing to work in areas subject to mold and ACM.



Analysis of Brownfield Cleanup Alternatives

4 EVALUATION OF CLEANUP ALTERNATIVES

December 5, 2025

3. Repairing and/or replacing the roof as necessary to prevent further moisture intrusion through the roof on a long-term basis and enable mold abatement work on the interior of the building to be completed without risk of reoccurrence.
4. Establishing appropriate containment, barrier, and air-filtration systems as necessary for workers in appropriate protective clothing to work in areas subject to mold, LBP, and ACM.
5. Removing the ceiling and disposing of appropriately as ACWMs.
6. Restoration of the building may include repairing or rerouting any plumbing or water lines located in areas above the ceiling that are impacted by the ACM removal process and roof replacement. This is a requirement to restore the building envelope post abatement as these repaired utility lines would be located within the roofing/ceiling materials to service roofing equipment (heating, ventilation, and air conditioning [HVAC], emergency sprinkler systems, and water supply lines) as necessitated by a building restoration plan.
7. Constructing a new drop ceiling.
8. Abating limited ACM and LBP in other areas of the building as needed.
9. Disposing of waste at an appropriately licensed landfill under applicable waste manifests at a facility that can receive for ACWMs, LBP and mold-impacted building materials.

4.3 Cleanup Alternative Evaluation

To satisfy EPA requirements, three characteristics of each alternative -- effectiveness, implementability, and cost -- must be considered prior to selecting a recommended cleanup alternative. These characteristics are considered for each alternative in the following sections.

4.3.1 EFFECTIVENESS

Effectiveness has both short-term and long-term components. The short-term effectiveness of a remedial alternative is evaluated relative to its effect on human health and the environment during the implementation of the remedial action. Potential risks to the community, potential impacts on workers, the effectiveness and reliability of protective measures, potential environmental impact of the remedial action and the effectiveness/reliability of the mitigation measures during implementation, etc. are some of the factors that are typically considered. Long-term effectiveness and permanence of a remedial alternative are evaluated with respect to the following factors: magnitude of residual risk to human health and environment from the untreated or residual waste at the completion of remedial activities; an assessment of type, degree, and adequacy of long-term management (engineering controls, monitoring, maintenance, etc.) required for untreated or residual waste; an assessment of the long-term reliability of long-term management practices to provide continued protection from the untreated/residual waste; and the potential need for replacement of the remedy and continuing need for repairs to maintain the performance of the remedy.

4.3.1.1 Alternative 1 (No Action)

The No Abatement Alternative would use engineering and institutional controls (e.g., locked doors, signage) to manage identified ACMs and other hazardous materials in-place within the Subject Property building.



Analysis of Brownfield Cleanup Alternatives

4 EVALUATION OF CLEANUP ALTERNATIVES

December 5, 2025

Various engineering and institutional controls, if properly implemented, would be effective in mitigating the risk associated with ACM and LBP presence by minimizing or eliminating human exposure to these materials. However, maintaining the existing building roof would create an increased risk of exposure and building envelope/roof failure with time. The effectiveness of this alternative requires initial measures to isolate hazards, and continued management to maintain hazard isolation and maintain fair condition of the roof. The overall effectiveness of Alternative 1 is considered poor as the long-term reliability of on-going management is considered challenging and roofing will eventually need to be removed and replaced. In addition, Alternative 1 would not allow the Subject Property to be redeveloped.

4.3.1.2 Alternative 2 (Encasement/Enclosure)

Encasement/enclosure is considered to be an effective method in addressing ACMs within the ceiling. However, encasement/enclosure is considered to be less effective in addressing mold. Full removal of the ceiling and other interior finishings (drywall, carpeting, wall panels, insulation, non-structural walls and partitions, etc.) is recommended by abatement contractors in order to effectively access and treat mold-impacted areas of the building that may also have been subject to water damage. This alternative does not propose access to all areas of the building that may have mold (i.e. above the ceiling). The long-term effectiveness of this alternative could be compromised by ongoing leaks in the roof that could develop in the future as this alternative does not include a full roof replacement and only limited roof repairs. Given the state of disrepair to the roof, with some areas of failure, the effectiveness of limited repairs (i.e., patching of holes in the roof) is likely to be short-term solution, at best, that may result in a reoccurrence of mold. Another consideration for this alternative is that the facility would need to “maintain” asbestos in the ceiling in perpetuity and would need to develop and implement a site-specific asbestos operations and maintenance (O&M) plan. Maintenance of the ACMs behind encapsulation would require an AHERA-certified professional to make repairs to the building which may also require annual inspection and maintenance. There would also be the on-going need to provide annual notifications to employees and occupants. The overall effectiveness of Alternative 2 is considered poor due to the roof’s state of disrepair, likely reoccurrence of mold, cost and long-term O&M requirements associated with encapsulation.

4.3.1.3 Alternative 3 (Removal)

The Complete Abatement of ACM Alternative would use abatement to remove all identified ACM, LBP and mold within the interior of the building. This alternative would also replace the building ceilings and roof. With all ACMs and hazardous materials abated from the building and the roof replaced, the risk to human health associated with exposure would be eliminated. There would be no need for ongoing engineering and institutional controls. The overall effectiveness of Alternative 3 is considered good.

4.3.2 ABILITY TO IMPLEMENT

An assessment of implementability is intended to evaluate whether, or with how much difficulty, the cleanup alternative can be implemented and whether the alternative’s continued effectiveness can be assessed and verified.



Analysis of Brownfield Cleanup Alternatives

4 EVALUATION OF CLEANUP ALTERNATIVES

December 5, 2025

4.3.2.1 Alternative 1 (No Action)

Alternative 1 has generally already been implemented by the Subject Property owner. Stantec recommends, if this alternative is anticipated to continue to be implemented for multiple years, that additional measures be taken to ensure the isolation of ACM in poor condition from the Subject Property owner and authorized personnel that may enter the building. Furthermore, the effectiveness of Alternative 1 may be verifiable depending on the condition of the building through the collection and analysis of air samples for ACM fibers. Alternative 1 is considered good to moderately easy to implement as it will require monitoring of institutional and engineering controls to mitigate exposure to and further release of ACM. However, Alternative 1 would not allow for the Subject Property to be redeveloped.

4.3.2.2 Alternative 2 (Encasement/Enclosure)

Encasement/enclosure is also considered relatively implementable. Both the ACMs and mold abatement would have similar requirements in terms of establishing appropriate containment, barrier, and air-filtration systems – assuming that a single remedial contractor can be used to perform both types of abatement. However, leaving the existing ceiling and roof structure in place would likely complicate efforts to inspect, repair, or treat the roof and areas above the ceiling. Furthermore, working to preserve the ceiling and encapsulate ACMs in portions of the building will require close oversight and coordination with the abatement contractor. These activities will require close monitoring and documentation to be able to manage the building in the future. This alternative comes with significant risk of recontamination of mold after encasement/encapsulation is complete as there is a high likelihood that some mold spores would remain in structural materials (particularly in the roofing structure) and the roof is not considered to be competent to preserve the building envelope post remediation. In addition, this alternative would result in on-going future maintenance, monitoring, and/or notification requirements for ACM in building materials.

4.3.2.3 Alternative 3 (Removal)

Removal is considered relatively easy to implement and would provide advantages (over Alternative 2) as a result of the area above the ceiling up to the roof becoming fully visible and accessible. Some additional construction work would be needed for the roof replacement, but this work could likely be performed after ACM, LBP, and mold have been abated and thereby not require specialized safety equipment to protect the workers.

4.3.3 COSTS

Estimated costs were prepared for each of the three alternatives as presented in Appendix D. These costs are considered to be rough order of magnitude (ROM) cost estimates based on subcontractor bids from three regional qualified asbestos abatement contractors, professional judgement and experience, and in consideration of several key assumptions as described in the subsections above. These costs should be refined once an alternative is selected.



Analysis of Brownfield Cleanup Alternatives

4 EVALUATION OF CLEANUP ALTERNATIVES

December 5, 2025

4.3.3.1 Alternative 1 (No Action)

The ROM cost associated with Alternative 1 is approximately \$0. There are likely costs associated with 1) added isolation measures for ACMs in poor condition; 2) continued monitoring to evaluate whether materials that are presently intact deteriorate over time; and 3) maintaining the building envelope; 4) inevitable demolition of the building if it is not maintained. These broad considerations have not been incorporated into the ROM cost estimate as there are many other building management and maintenance considerations if the No Action Alternative is implemented. This also does not account for the considerable lost opportunity cost of leaving the Subject Property unfit for community use.

4.3.3.2 Alternative 2 (Encapsulation/Enclosure)

The ROM cost estimate for this alternative is \$675,400. This estimate includes cleanup of limited ACMs listed in Table 2.1 and encapsulation of remaining ACMS with limited roof repairs, which is assumed to contain ACM. This alternative would not result in unrestricted use of the Subject Property as long-term O&M would be required to maintain encapsulated areas. The ROM cost estimate for Alternative 2 includes an O&M budget of \$1,500 annually for a 30-year period to allow for regular maintenance and notifications, as well as the cost of a roofing overlay to encapsulate ACM roofing materials and ongoing engineering and institutional controls to protect the safety of Subject Property workers. These O&M cost estimates are likely to increase substantially when future building alteration would affect these encapsulated areas. This estimate includes third party oversight during abatement activities for a period of 3 weeks and also includes closeout reporting to be submitted to various regulatory agencies once the project is complete.

4.3.3.3 Alternative 3 (Removal)

The ROM cost estimate for this alternative is \$1,194,000. This includes the removal of all identified ACM and LBP in the building and the removal of all interior finishes to remove and clean mold. This alternative also includes a roof replacement which is necessary to restore the building envelope properly once the ceiling is exposed. This estimate includes oversight during abatement activities for a period of 6 weeks and closeout reporting to be submitted to various regulatory agencies once the project is complete.

4.3.4 GREEN REMEDIATION CONSIDERATIONS

The carbon footprint associated with asbestos and other hazardous abatement is relatively small. ACM waste requires disposal in an appropriately-licensed landfill. The American Avenue Landfill is located 25 miles from the Subject Property so the carbon footprint associated with non-friable ACM transport for disposal will be relatively small. Finally, reuse of the Subject Property building would have a much smaller carbon footprint than demolition of the building and construction of a new building of similar function and size. So overall adaptive reuse of existing brownfield structures is considered a form of green remediation.



Analysis of Brownfield Cleanup Alternatives

4 EVALUATION OF CLEANUP ALTERNATIVES
December 5, 2025

4.4 Recommended Cleanup Alternative

To quantitatively evaluate the three cleanup alternatives, the following point system is utilized:

- Good – 5 points
- Good-Moderate – 4 points
- Moderate – 3 points
- Moderate-Poor – 2 points
- Poor – 1 point
- Not Applicable (N/A) – 0 points

Alternative	Effectiveness	Implementability	Cost	Score
Alternative 1	Poor: 1	N/A: 0	Good: 5	6
Alternative 2	Moderate: 3	Moderate: 3	Moderate: 3	9
Alternative 3	Good: 5	Good: 5	Moderate: 3	13

Based upon this quantitative scoring system for the Subject Property, **Alternative 3: Complete Abatement Of ACM, LBP, and mold with Roof Replacement is recommended.** The incremental cost savings to encapsulate the roof versus replacing the roof is fairly negligible considering how ineffective Alternative 2 is in both short-term and long-term contexts. Implementation of Alternative 3 also frees the Subject Property owner from ongoing long-term implementation and management of engineering and institutional controls to control RBM hazards identified throughout the building.



5 References

Krazan and Associates, Inc. (Krazan). 2024. Asbestos Survey, Commercial Property, 887 Fulton Street, Fresno, California 93721. October 29.

Krazan. 2025. Lead-Based Paint Survey, Commercial Property, 887 Fulton Street, Fresno, California. July 22.

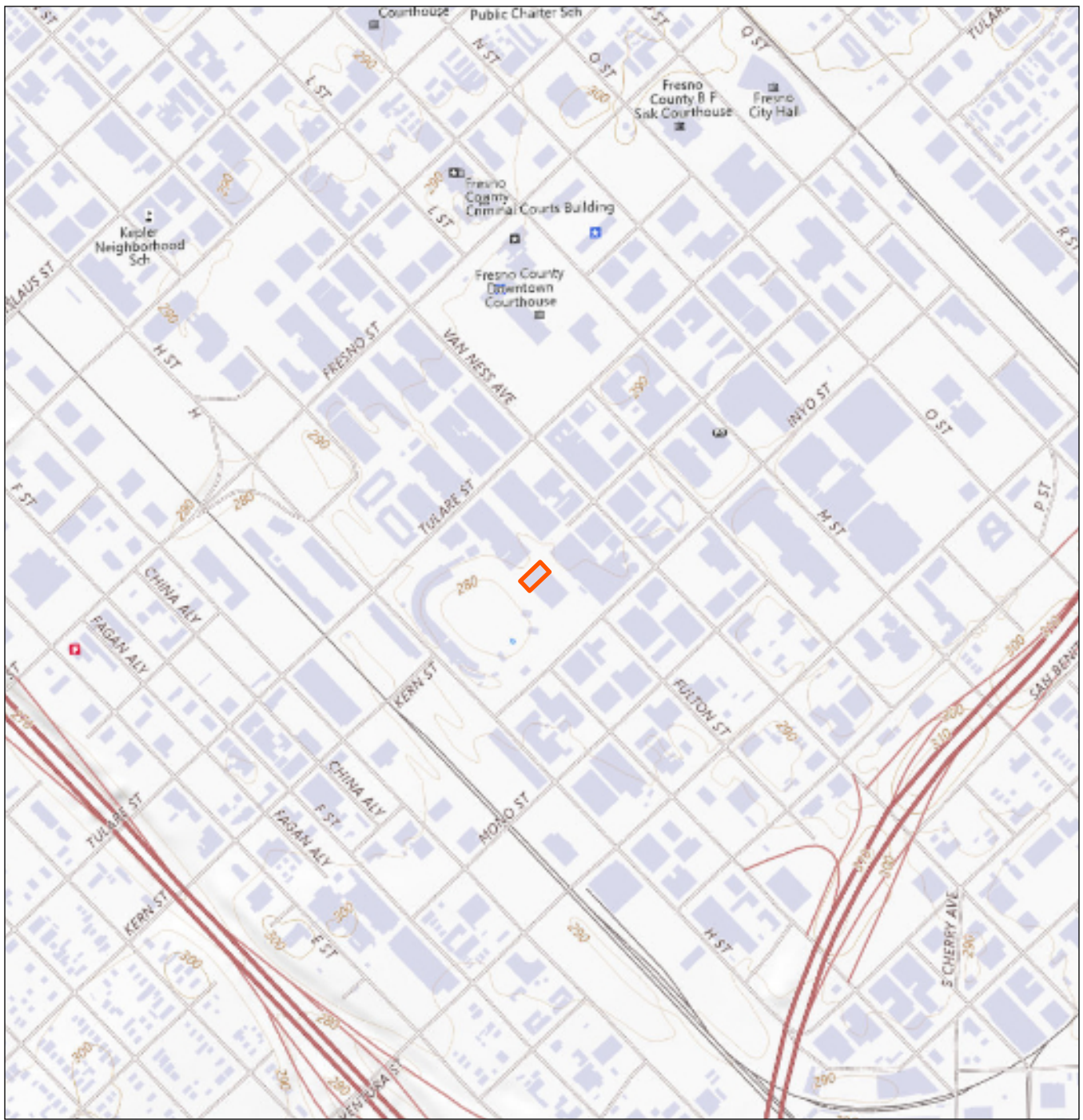
Krazan. 2024. "Phase I Environmental Site Assessment, Commercial Property, 887 Fulton Street, APN 468-282-21T, Fresno, California 93721." July 11.

U.S. Environmental Protection Agency (USEPA). 1987. 40 Code of Federal Regulations (CFR) Part 763; Asbestos-Containing Materials in Schools; Final Rule. October.

U.S. Department of Housing and Urban Development. 1997. Guidelines for the Evaluation and Control of Lead-Based Paint Hazards in Housing. Chapter 7: Lead-Based Paint Inspection.



FIGURES



 Subject Property Boundary



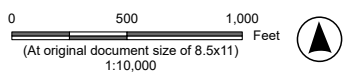
Project Location
 Parcel Number: 468-282-21T (0.24 Acres)
 887 Fulton Street
 Fresno, California 93721

Client/Project 203724380
 City of Fresno
 EPA Revolving Loan Fund Grant
 Analysis of Brownfield Cleanup
 Alternatives Report

Title **Subject Property Location Map** *Figure No.*

1

Notes
 1. Coordinate System: NAD 1983 UTM Zone 10N
 2. Background: USGS The National Map: National Boundaries Dataset, 3DEP Elevation Program, Geographic Names Information System, National Hydrography Dataset, National Land Cover Database, National Structures Dataset, and National Transportation Dataset; USGS Global Ecosystems; U.S. Census Bureau TIGER/Line data; USFS Road data; Natural Earth Data; U.S. Department of State HIU; NOAA National Centers for Environmental Information. Data refreshed July, 2025. Sources: Esri, TomTom, Garmin, FAO, NOAA, USGS, © OpenStreetMap contributors, and the GIS User Community





C:\working\203724380_fm\mxd\090807_fulton_ch11esa_20250731.mxd - Revised: 2025-07-31 11:40:48 AM

 Subject Property Boundary



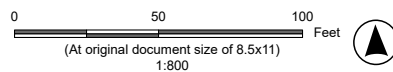
Project Location
 Parcel Number: 468-282-21T (0.24 Acres)
 887 Fulton Street
 Fresno, California 93721

Client/Project 203724380

City of Fresno
 EPA Revolving Loan Fund Grant
 Analysis of Brownfield Cleanup
 Alternatives Report

Title
**Subject Property Project Area
 Map**

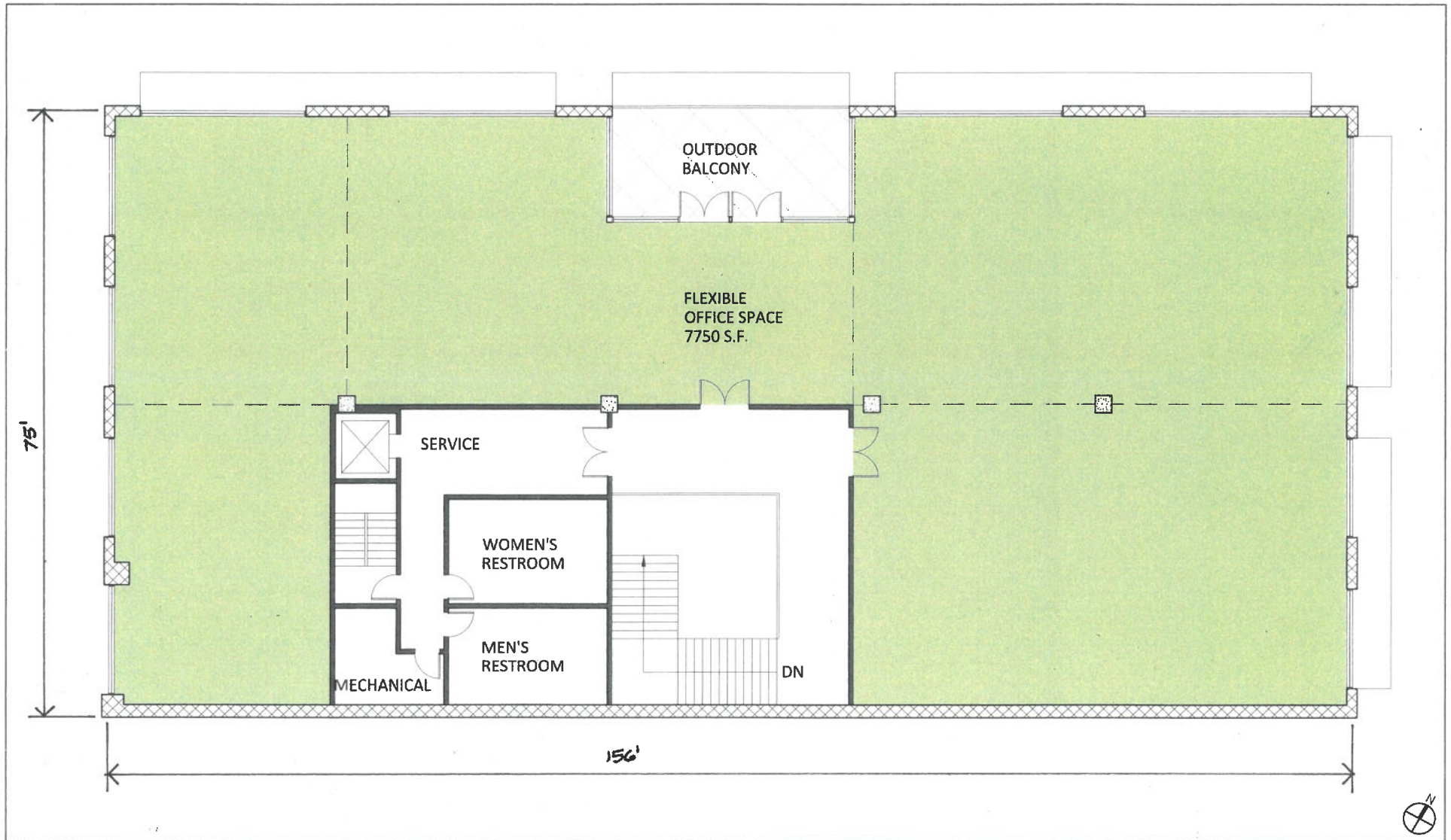
Figure No.
2



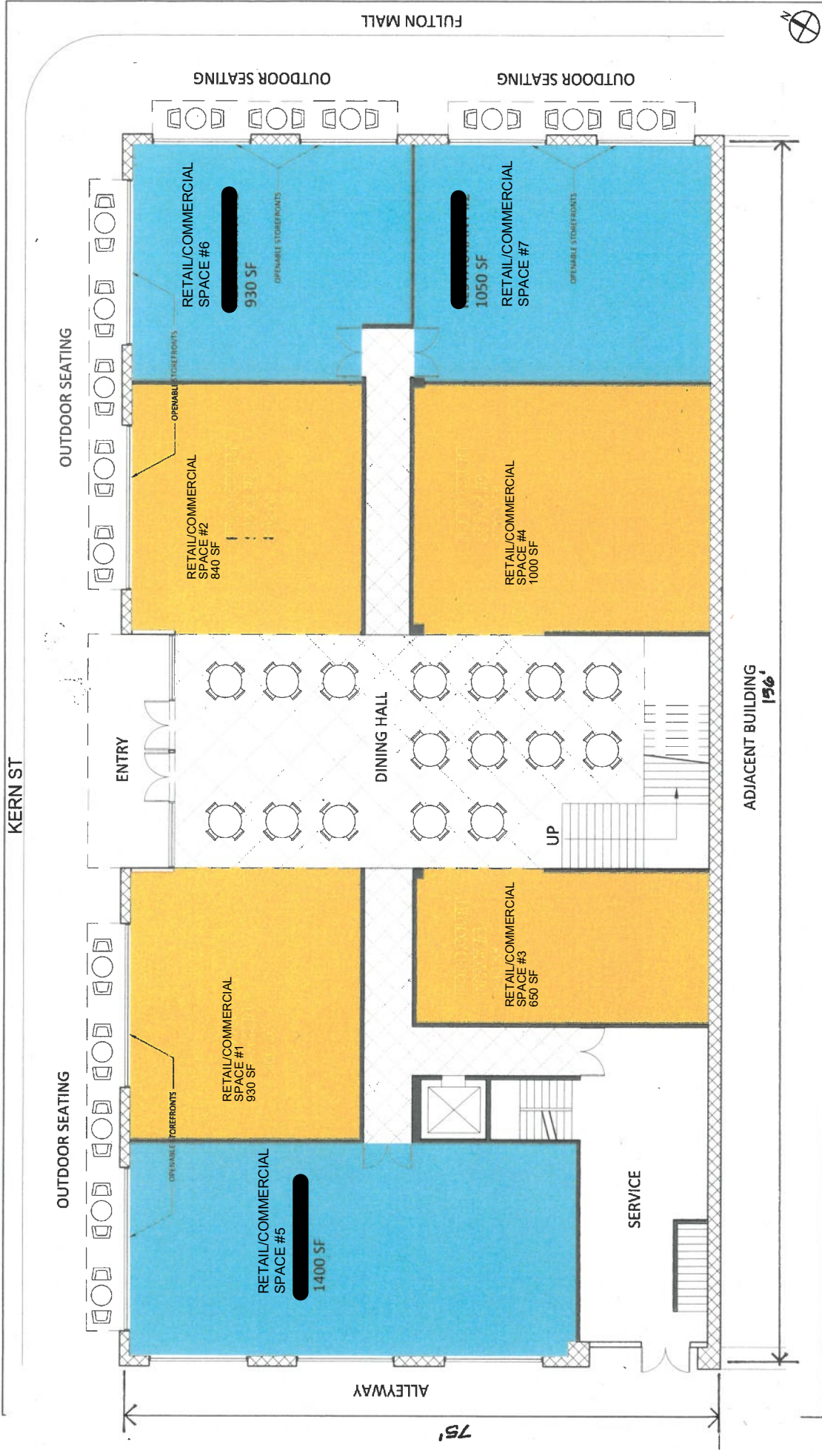
Notes
 1. Coordinate System: NAD 1983 UTM Zone 10N
 2. Background: © OpenStreetMap (and) contributors, CC-BY-SA

APPENDIX A - Proposed Building Renovation Plans

~ 12,500 SF Available - All or Part



PROPOSED SECOND FLOOR PLAN

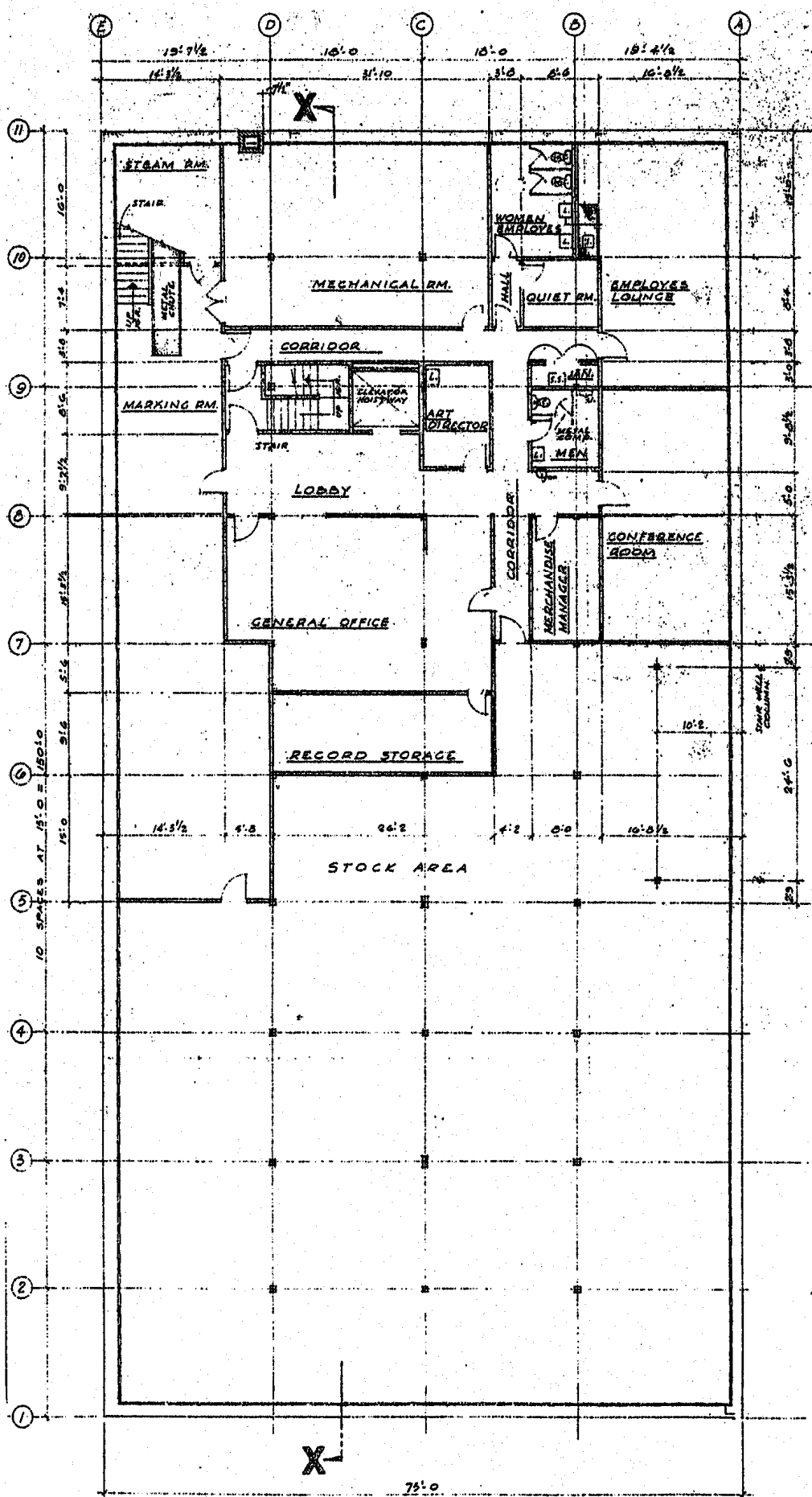


PROPOSED FIRST FLOOR PLAN

“In close proximity to”

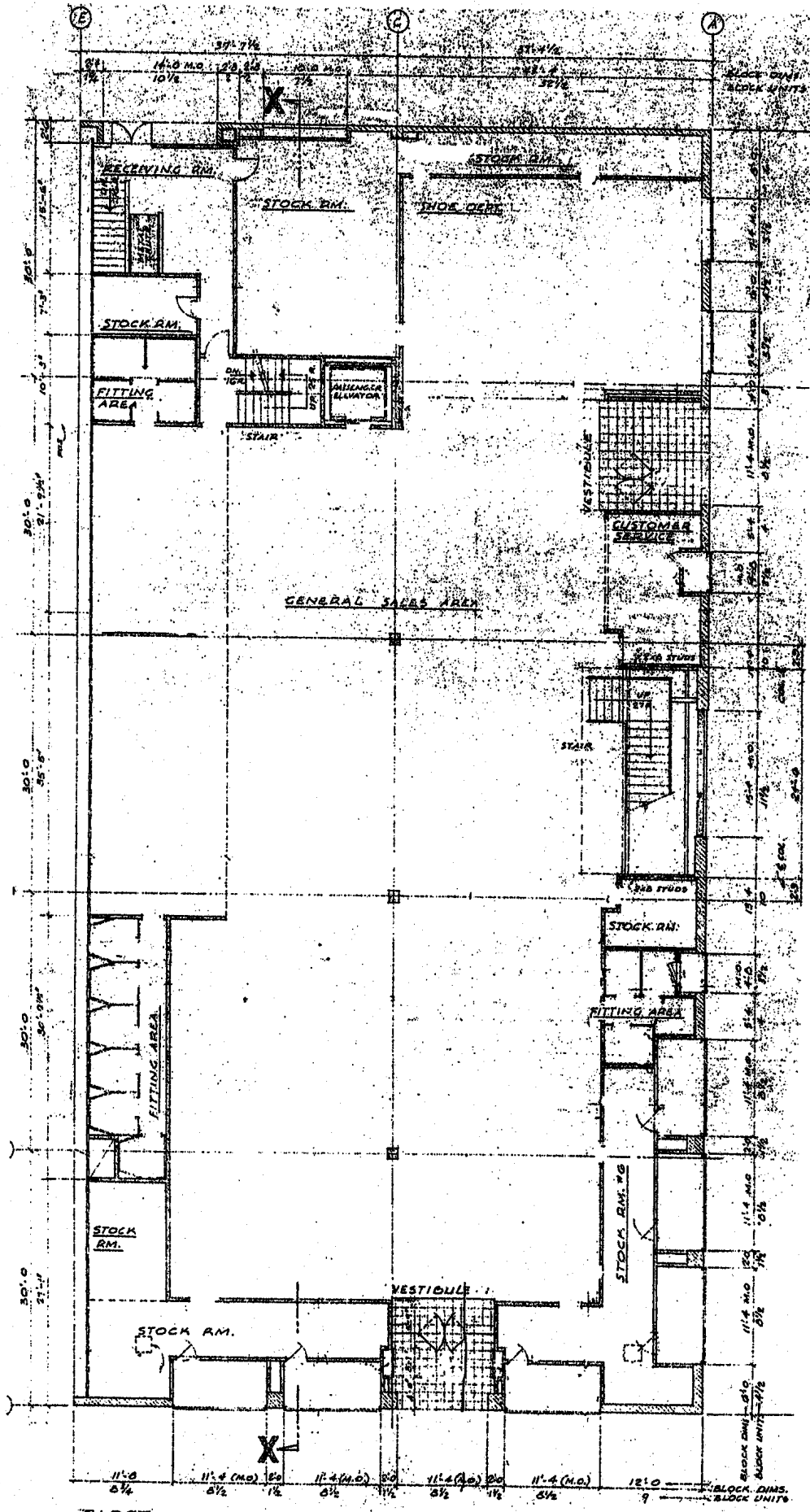
Chukchansi Park-Home to the Washington Nationals AAA baseball team, The Fresno Grizzlies, Fresno City Hall, Fresno City College in the Guarantee Building on Fulton Street, City and County Government Administrative Offices, Tioga Sequoia Brewery, Community Regional Medical Center, Amtrak and other intermodal stations, Future home to Fresno's High Speed Rail Station

APPENDIX B - Property Floor Plans



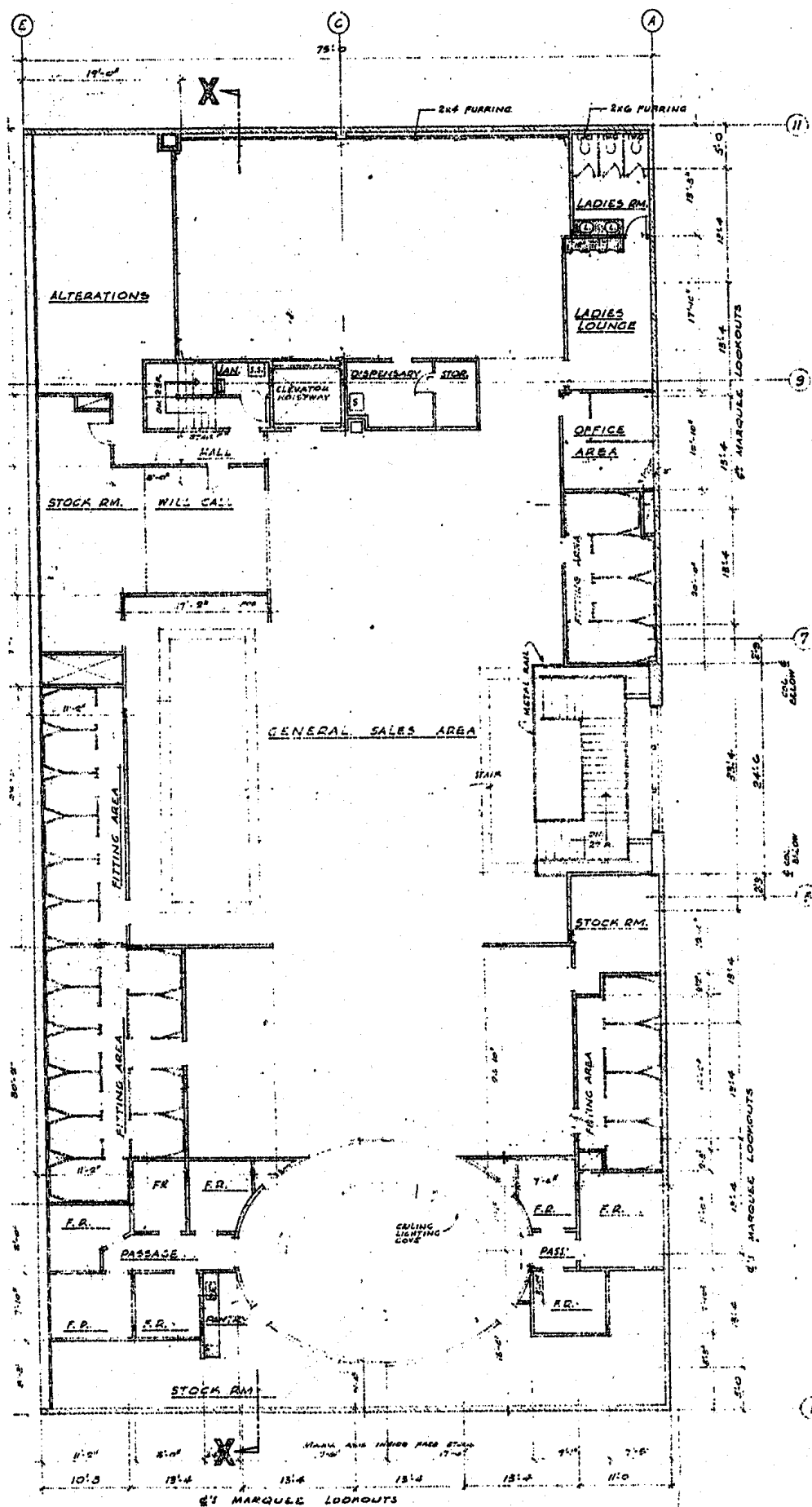
BASEMENT

Basement Floorplan
Larger Plan Available Upon Request




FIRST

First Floor Floorplan
Larger Plan Available Upon Request



SECOND

FLOOR PLANS 

Second Floor Floorplan
Larger Plan Available Upon Request

APPENDIX C - Regulated Building Materials Survey Reports

**ASBESTOS SURVEY
COMMERCIAL PROPERTY
887 FULTON STREET
FRESNO, CALIFORNIA**

Project No. 014-24091
October 29, 2024

Prepared for:
Dora Westerlund
Fresno Area Hispanic Foundation
c/o The Taylor Group Architects
410 Park Creek Drive
Clovis, California 93721
(559) 708-4046

Prepared by:
Krazan & Associates, Inc.
215 West Dakota Avenue
Clovis, California 93612
(559) 348-2200

TABLE OF CONTENTS
Project No. 014-24091

	Page
1.0 INTRODUCTION	1
2.0 PURPOSE AND SCOPE OF WORK.....	1
3.0 BUILDING DESCRIPTION.....	1
4.0 INVESTIGATIVE METHODS	2
4.1 Sampling Protocols	2
4.2 Laboratory Analytical Methods	2
5.0 RESULTS OF INVESTIGATION	2
6.0 CONCLUSIONS	3
7.0 LIMITATIONS	4

Figures

Asbestos Survey Results.....	following text
Floor Plan.....	following Results

Appendices

Analytical Results and Chain-of-Custody Record	A
DOSH Certifications	B

October 29, 2024

Project No. 014-24091

**ASBESTOS SURVEY
COMMERCIAL PROPERTY
887 FULTON STREET
FRESNO, CALIFORNIA**

1.0 INTRODUCTION

This report presents the results of our asbestos survey for the structure located at 887 Fulton St. in Fresno, California. The asbestos survey was conducted under the conditions of Krazan & Associates, Inc.'s (Krazan's) Proposal No. P24-274, dated September 17, 2024. Dora Westerlund gave written authorization on September 25, 2024, for Krazan to proceed with the asbestos survey.

2.0 PURPOSE AND SCOPE OF WORK

The purpose of the asbestos survey was to identify and quantify the presence of potential asbestos-containing materials (ACMs) at the on-site structure. The scope of work for the asbestos survey included conducting a visual survey of the structure and conducting bulk sampling and analysis of materials suspected to contain asbestos. This survey was performed in accordance with applicable local, state, and federal regulations.

3.0 BUILDING DESCRIPTION

The structure was a two-story structure with basement, stucco, brick, and ceramic tiled exterior walls, with mineral surface rolled roofing. Interior construction included gypsum board, acoustic ceiling tiles, plaster, and suspended ceilings with two-foot by four-foot ceiling panels; gypsum board, plaster, wood, brick, concrete block, open-framed, and ceramic tiled walls; and concrete floors overlain (in areas) by wall-to-wall carpeting, floor tiles, ceramic tiles, and terrazzo.

4.0 INVESTIGATIVE METHODS

4.1 Sampling Protocols

Sixty-two (62) samples of suspected ACMs were collected from throughout the on-site structure. Sample locations for this survey were chosen in a semi-random fashion with emphasis placed on minimizing damage to the sampled materials. The samples were collected by carefully removing a small amount of the suspect material in a non-abrasive manner. If possible, samples were collected from existing damaged areas or loose pieces of materials. Each sample was placed in a separate sealed plastic bag, and labeled with the project number and sample number. Refer to the Floor Plan following the text for the bulk sample locations.

4.2 Laboratory Analytical Methods

The bulk samples collected were analyzed by E.H.S. Laboratories of Richmond, Virginia, to detect the presence, type, and percentage of asbestos by polarized light microscopy/dispersion staining, following the procedure described in 40 CFR 763, Subpart E, Appendix A (AHERA). Copies of the Analytical Results and Chain-of-Custody Record are included in Appendix A.

5.0 RESULTS OF INVESTIGATION

As stated previously, 62 samples of suspected ACMs were collected from throughout the structure. Analytical laboratory results and field observations of the materials sampled have been summarized on Table I, following the text of this report. Information presented within the table includes the sample number, the sample description, the location where the sample was obtained, the asbestos content, the volume of ACMs identified (typically expressed in square feet), the condition of the material sampled, and a listing of locations where similar (homogenous) ACMs were also noted (although not necessarily sampled in these areas). In addition, footnotes have been provided to convey pertinent information regarding the specific sample or homogenous material.

The following materials were identified as containing at least one percent asbestos:

Texture associated with drywall – throughout structure (Sample Nos. 14, 15, 16, 17, 18, and 19). This material would be considered a friable ACM under the NESHAP Regulations.

9-in by 9-in Floor tile and associated mastic – throughout structure (Sample Nos. 33, 34, 35, 36, 37, 39, 40, and 62). This material would be considered a Category I non-friable ACM under the NESHAP Regulations.

The following materials were identified as containing at least one percent asbestos: (continued)

Pipe elbow insulation – basement mechanical room (Sample No. 49). This material would be considered a friable ACM under the NESHAP Regulations.

Roof core – roof (Sample No. 55). This material would be considered a Category I non-friable ACM under the NESHAP Regulations.

Roof mastic – on metal wall cap on roof (Sample No. 60). This material would be considered a Category I non-friable ACM under the NESHAP Regulations.

Vent pipe – on steam generator in basement (Assumed asbestos). This material would be considered a Category II non-friable ACM under the NESHAP Regulations.

The following materials were identified as containing trace asbestos, NESHAPs composite results.

Gypsum board and taping material – throughout structure (Sample Nos. 8, 9, 10, 11, 12, and 13).

6.0 CONCLUSIONS

The National Emissions Standards for Hazardous Air Pollutants (NESHAP) defines regulated asbestos-containing materials (RACM) as the following: friable materials containing more than one percent asbestos as determined by polarized light microscopy; Category I non-friable materials (i.e., floor tiles, asphalt roofing products) containing more than one percent asbestos that have become friable, have been subjected to or will be subjected to sanding, grinding, cutting, or abrading; and Category II non-friable materials (i.e., non-friable asbestos-containing materials that are not Category I materials) containing more than one percent asbestos that have a high probability of becoming or have already been reduced to a friable condition by demolition or renovation activities. The above-noted samples that contain greater than one percent asbestos and friable meet the definition of a RACM under the NESHAP. Depending on the abatement method employed the above noted samples that contain greater than one percent asbestos and considered non-friable may also become RACM. In addition, the California Division of Occupational Safety and Health (Cal-OSHA) defines asbestos-containing construction material (ACCM) as greater than 0.1 percent asbestos. The above-noted samples that contain greater than 0.1 percent asbestos would meet the definition of an ACCM.

If these asbestos-containing materials are left in place, the occupants of the structure should avoid buffing, sanding, grinding, or abrading these materials in any way. These activities could potentially release asbestos fibers. An Operations and Maintenance Program (O&M Program) could be developed for the management of asbestos-containing materials if left in place. The development and

implementation of such a program would require the designation and training of an asbestos program manager. The asbestos program manager would be responsible for conducting periodic inspections of the asbestos-containing materials, record keeping requirements, and providing awareness training necessary for any maintenance or custodial personnel required to clean or repair these materials. Furthermore, it is recommended that the asbestos program manager notify all potentially affected individuals.

When building maintenance, repair, renovation, or other activities disturb or damage ACMs, asbestos fibers may be released creating a potential hazard. Therefore, removal of friable and non-friable ACMs that have the potential to become friable during demolition and/or renovation is federally regulated under the NESHAP. The San Joaquin Valley Air Pollution Control District (APCD) is the responsible agency on the local level to enforce the NESHAP. The APCD Regional Office requires that asbestos-containing materials (ACM) be removed prior to renovation or demolition activities. Additionally, the APCD must be notified prior to any demolition and/or renovation activities.

7.0 LIMITATIONS

This survey and review of the subject property has been limited in scope. This investigation is undertaken with the risk that visual observations and random sampling alone would not reveal the presence, full nature, and extent of asbestos-containing materials. Krazan makes no representation as to the asbestos content of materials not sampled or that were inaccessible to our inspector (i.e., between walls, beneath floors, in pipe chases, etc.). The asbestos sample locations and building dimensions were measured/located in the field by tape measurement from existing features. Therefore, the sample locations, building dimensions, and approximate square footage of asbestos-containing materials should be considered accurate only to the degree implied by the methods used.

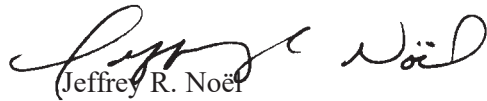
The findings presented in this report were based on field observations, random sampling and analysis, review of available data, and discussions with local regulatory and advisory agencies. Therefore, the data obtained are clear and accurate only to the degree implied by the sources and methods used. The information presented herewith was based on professional interpretation using presently accepted methods with a degree of conservatism deemed proper as of the report date. We do not warrant that future technical developments cannot supersede such data.

This asbestos survey is not intended to be the sole basis for asbestos removal bids. Confirmation of the condition and volume of the ACMs should be conducted by prospective removal contractors prior to accepting removal bids. This report is provided for the exclusive use of the client noted on the cover page and is subject to the terms and conditions in the applicable contract between the Client and Krazan. The client is the only party to whom Krazan has explained the risks involved and has been involved in the shaping of the scope of services needed to satisfactorily manage those risks, if any, from the client's point of view. Any third party use of this report, including use by the Client's lender, prospective purchaser, or lessee will be subject to the terms and conditions governing the contractual work between the Client and Krazan. The unauthorized use of, reliance on, or release of the information contained in this report, without the expressed written consent of Krazan, is strictly prohibited and will be without risk or liability to Krazan.

Asbestos analysis was conducted by a laboratory accredited under the National Voluntary Laboratory Accreditation Program (NVLAP) administered by the National Institute of Standards and Technology (NIST). The results of the asbestos analyses are accurate only to the degree and care of ensuring the testing accuracy and the representative nature of the samples obtained.

If you have any questions or if we may be of further assistance, please do not hesitate to contact our office at (559) 348-2200.

Respectfully submitted,
KRAZAN & ASSOCIATES, INC.



Jeffrey R. Noë
DOSH Certified Asbestos Consultant
No. 00-2828

JRN/mlt

KRAZAN & ASSOCIATES, INC.

With Offices Serving the Western United States

TABLE I
ASBESTOS ANALYSIS RESULTS
 Commercial Property
 887 Fulton Street
 Fresno, California
 October 14, 2024 Sampling

Sample No.	Sample Description	Sample Location	Asbestos		Condition / Friability	Notes/ Additional Locations
			Content	Approx. Sq. Ft.		
1	Plaster	2nd floor	ND	NC	NA	homogenous throughout
2	Plaster	1st floor	ND	NC	NA	homogenous throughout
3	Plaster	basement	ND	NC	NA	homogenous throughout
4	Skim coat	2nd floor	ND	NC	NA	homogenous throughout
5	Skim coat	1st floor	ND	NC	NA	homogenous throughout
6	Skim coat	basement	ND	NC	NA	homogenous throughout
7	Gypsum board	2nd floor	ND	NC	NA	plaster backer board, homogenous throughout
8	<i>Gypsum board / taping material</i>	<i>2nd floor</i>	<i>Trace</i>	<i>see # 14</i>	<i>NA</i>	<i>homogenous throughout</i>
9	<i>Gypsum board / taping material</i>	<i>2nd floor</i>	<i>Trace</i>	<i>see # 14</i>	<i>NA</i>	<i>homogenous throughout</i>
10	<i>Gypsum board / taping material</i>	<i>1st floor</i>	<i>Trace</i>	<i>see # 14</i>	<i>NA</i>	<i>homogenous throughout</i>
11	<i>Gypsum board / taping material</i>	<i>1st floor</i>	<i>Trace</i>	<i>see # 14</i>	<i>NA</i>	<i>homogenous throughout</i>
12	<i>Gypsum board / taping material</i>	<i>basement</i>	<i>Trace</i>	<i>see # 14</i>	<i>NA</i>	<i>homogenous throughout</i>
13	<i>Gypsum board / taping material</i>	<i>basement</i>	<i>Trace</i>	<i>see # 14</i>	<i>NA</i>	<i>homogenous throughout</i>
14	Texture	2nd floor	4%	60,000	G/FR	homogenous throughout
15	Texture	2nd floor	4%	see # 14	G/FR	homogenous throughout
16	Texture	1st floor	4%	see # 14	G/FR	homogenous throughout
17	Texture	1st floor	4%	see # 14	G/FR	homogenous throughout
18	Texture	basement	4%	see # 14	G/FR	homogenous throughout
19	Texture	basement	4%	see # 14	G/FR	homogenous throughout
20	Wallpaper	2nd floor	ND	NC	NA	
21	Wallpaper	2nd floor	ND	NC	NA	
22	Wallpaper	2nd floor	ND	NC	NA	
23	Wallpaper	2nd floor	ND	NC	NA	
24	Wallpaper	2nd floor	ND	NC	NA	
25	Wallpaper	1st floor	ND	NC	NA	
26	Wallpaper	1st floor	ND	NC	NA	
27	Wallpaper	basement	ND	NC	NA	
28	12-in by 12-in Ceiling tile	basement	ND	NC	NA	main
29	12-in by 12-in Ceiling tile	basement	ND	NC	NA	patch
30	12-in by 12-in Ceiling tile	basement	ND	NC	NA	patch
31	2-ft by 4-ft Ceiling panel	1st floor	ND	NC	NA	vinyl wrapped gypsum board

NA = Not applicable
 F = Fair condition
 NC = Not calculated
 G = Good condition
 ND = None detected
 NF = Non-friable
 Trace = Less than one percent (<1%) chrysotile asbestos
 FR = Friable

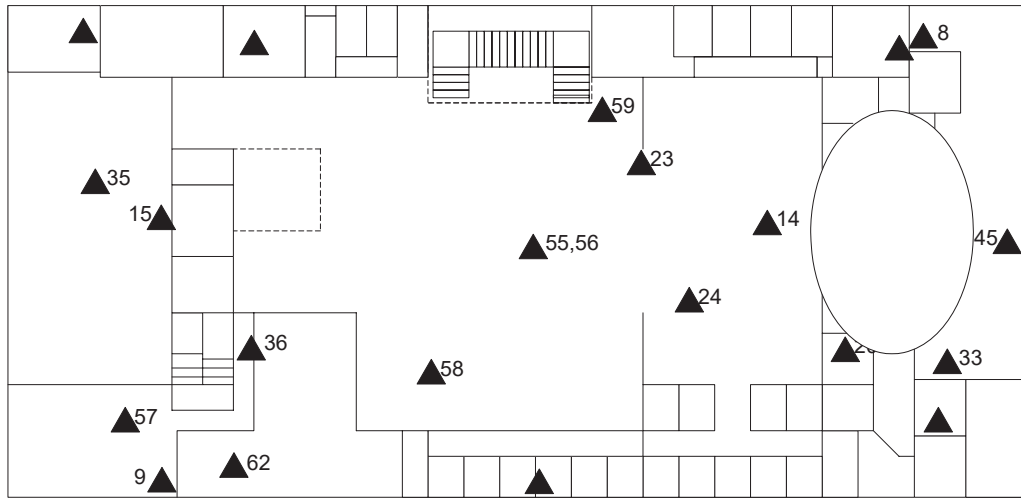
TABLE I (Continued)
ASBESTOS ANALYSIS RESULTS

Commercial Property
 887 Fulton Street
 Fresno, California
 October 14, 2024 Sampling

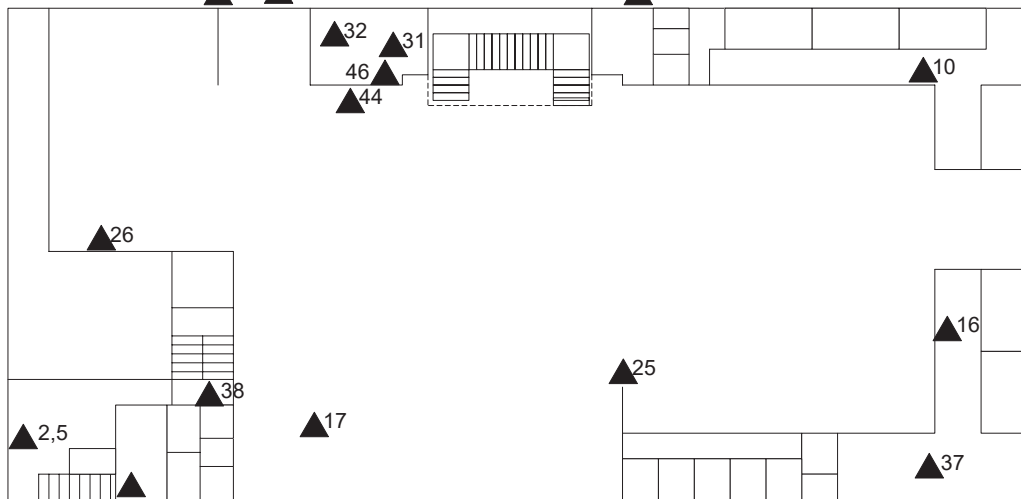
Sample No.	Sample Description	Sample Location	Asbestos Content	Approx. Sq. Ft.	Condition / Friability	Notes/ Additional locations
32	2-ft by 4-ft Ceiling panel	1st floor	ND	NC	NA	vinyl wrapped gypsum board
33	9-in by 9-in Floor tile / mastic	2nd floor	4% / 4%	600	G/NF	brown streaked
34	9-in by 9-in Floor tile / mastic	2nd floor	5% / 4%	450	G/NF	gray streaked
35	9-in by 9-in Floor tile	2nd floor	6%	700	G/NF	tan
36	9-in by 9-in Floor tile / mastic	2nd floor	5% / 4%	75	G/NF	tan
37	9-in by 9-in Floor tile / mastic	1st floor	4% / 4%	600	G/NF	brown streaked
38	9-in by 9-in Floor tile / mastic	1st floor	ND	NC	NA	yellow
39	9-in by 9-in Floor tile / mastic	basement	4% / 4%	800	G/NF	tan
40	9-in by 9-in Floor tile / mastic	basement	4% / 5%	300	G/NF	green streaked
41	Stair tread	basement	ND	NC	NA	
42	Ceiling tile mastic	basement	ND	NC	NA	
43	Base cove mastic	basement	ND	NC	NA	
44	Base cove mastic	1st floor	ND	NC	NA	
45	Base cove mastic	2nd floor	ND	NC	NA	
46	Paneling mastic	1st floor	ND	NC	NA	
47	Ducting tape	basement	ND	NC	NA	on metal ducting seams
48	Ducting tape	basement	ND	NC	NA	on metal ducting seams
49	Pipe elbow	basement	8%	<50	G/FR	
50	Pipe insulation wrap	basement	ND	NC	NA	over fiberglass insulation
51	Pipe insulation wrap	basement	ND	NC	NA	over fiberglass insulation
52	Stucco	exterior	ND	NC	NA	homogenous throughout
53	Stucco	exterior	ND	NC	NA	homogenous throughout
54	Stucco	exterior	ND	NC	NA	homogenous throughout
55	Roof core	roof	15%	11,000	G/NF	full depth core
56	Roof tar	roof	ND	NC	NA	between roofing layers and seams
57	Roof mastic	roof	ND	NC	NA	roof penetrations
58	Roof mastic	roof	ND	NC	NA	roof patch
59	Roof mastic	roof	ND	NC	NA	roof patch
60	Roof mastic	roof	8%	<100	G/NF	on metal wall cap
61	Terrazzo flooring	1st floor	ND	NC	NA	at front and side entry
62	9-in by 9-in Floor tile / mastic	2nd floor	4% / 4%	200	G/NF	brown streaked
---	Vent pipe	basement	Assumed	75	G/NF	

NA = Not applicable
 NC = Not calculated
 ND = None detected
 Trace = Less than one percent (<1%) chrysotile asbestos

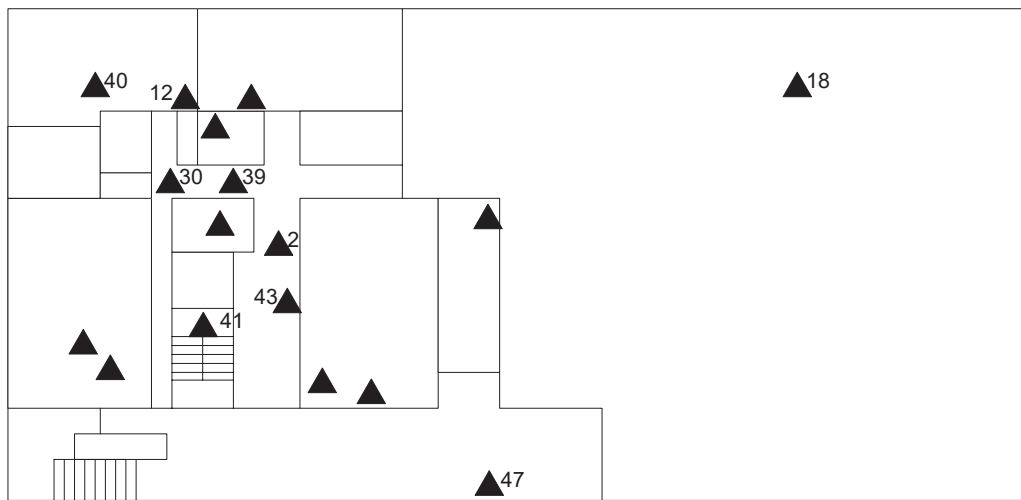
F = Fair condition
 G = Good condition
 NF = Non-friable
 FR = Friable



Second Floor



First Floor



Basement Level

EXPLANATION

▲ BUILDING MATERIAL SAMPLE LOCATION

FLOOR PLAN WITH BUILDING MATERIAL SAMPLE LOCATIONS

COMMERCIAL PROPERTY
887 FULTON STREET
FRESNO, CALIFORNIA

Scale:
NOT TO SCALE

Drawn by:
J. R. N.

Project No.
014-24091

Date:
10 / 24

Approved by:
J.R.N

Figure No.
1



Appendix A



Asbestos Bulk Analysis Report

7469 Whitepine Rd
 North Chesterfield, VA 23237
 Telephone: 800.347.4010

Report Number: 24-10-02952

Client: Krazan & Associates Inc.
 215 West Dakota Ave
 Clovis, CA 93612

Received Date: 10/15/2024
 Analyzed Date: 10/18/2024, 10/19/2024
 Reported Date: 10/22/2024

Project/Test Address: 014-24091; Commercial Property; 887 Fulton Street

Client Number:
 05-5650

Fax Number:
 559-348-2201

Laboratory Results

Lab Sample Number	Client Sample Number	Layer Type	Lab Gross Description	Asbestos	Other Materials
24-10-02952-001	1		Pale Beige-Gray Cementitious; Homogeneous	NAD	100% Non-Fibrous
24-10-02952-002	2		Off-White Cementitious; White Brittle; Inhomogeneous	NAD	1% Cellulose 99% Non-Fibrous
24-10-02952-003	3		Off-White Cementitious; Homogeneous	NAD	100% Non-Fibrous
24-10-02952-004	4		Light Beige-Gray Cementitious; Homogeneous	NAD	1% Cellulose 99% Non-Fibrous
24-10-02952-005	5		Off-White Cementitious; Homogeneous	NAD	100% Non-Fibrous

Environmental Hazards Services, L.L.C

Client Number: 05-5650
 Project/Test Address: 014-24091; Commercial Property; 887
 Fulton Street

Report Number: 24-10-02952

Lab Sample Number	Client Sample Number	Layer Type	Lab Gross Description	Asbestos	Other Materials
24-10-02952-006	6		Off-White Cementitious; Homogeneous	NAD	100% Non-Fibrous
24-10-02952-007	7		Off-White Brittle; Tan Fibrous; Inhomogeneous	NAD	10% Cellulose 7% Fibrous Glass 83% Non-Fibrous
24-10-02952-008	8		Off-White/Light Beige- Gray Brittle; Tan Fibrous; Light Beige Pliable to Brittle; Inhomogeneous	Trace <1% Chrysotile	12% Cellulose 5% Fibrous Glass 83% Non-Fibrous
Total Asbestos: Trace <1%					
Chrysotile present in light beige-gray brittle joint compound-type layer; this material alone contains 4% chrysotile.					
24-10-02952-009	9		Off-White/Light Beige- Gray Brittle; Tan Fibrous; Light Beige Pliable to Brittle; Inhomogeneous	Trace <1% Chrysotile	10% Cellulose 7% Fibrous Glass 83% Non-Fibrous
Total Asbestos: Trace <1%					
Chrysotile present in light beige-gray brittle joint compound-type layer; this material alone contains 4% chrysotile.					
24-10-02952-010	10		Off-White/Light Beige- Gray Brittle; Tan Fibrous; Light Beige Pliable to Brittle; Inhomogeneous	Trace <1% Chrysotile	10% Cellulose 8% Fibrous Glass 82% Non-Fibrous
Total Asbestos: Trace <1%					
Chrysotile present in light beige-gray brittle joint compound-type layer; this material alone contains 4% chrysotile.					
24-10-02952-011	11		Off-White/Light Beige- Gray Brittle; Tan Fibrous; Light Beige Pliable to Brittle; Inhomogeneous	Trace <1% Chrysotile	12% Cellulose 5% Fibrous Glass 83% Non-Fibrous
Total Asbestos: Trace <1%					
Chrysotile present in light beige-gray brittle joint compound-type layer; this material alone contains 4% chrysotile.					

Environmental Hazards Services, L.L.C

Client Number: 05-5650
 Project/Test Address: 014-24091; Commercial Property; 887
 Fulton Street

Report Number: 24-10-02952

Lab Sample Number	Client Sample Number	Layer Type	Lab Gross Description	Asbestos	Other Materials
24-10-02952-012	12		Off-White/Light Beige-Gray Brittle; Tan Fibrous; Light Beige Pliable to Brittle; Inhomogeneous	Trace <1% Chrysotile	12% Cellulose 5% Fibrous Glass 83% Non-Fibrous
Total Asbestos: Trace <1%					
Chrysotile present in light beige-gray brittle joint compound-type layer; this material alone contains 4% chrysotile.					
24-10-02952-013	13		Off-White/Light Beige-Gray Brittle; Tan Fibrous; Light Beige Pliable to Brittle; Inhomogeneous	Trace <1% Chrysotile	10% Cellulose 7% Fibrous Glass 83% Non-Fibrous
Total Asbestos: Trace <1%					
Chrysotile present in light beige-gray brittle joint compound-type layer; this material alone contains 4% chrysotile.					
24-10-02952-014	14		Pale Beige Brittle to Coarse Powder; Pale Mauve Pliable to Brittle; Inhomogeneous	4% Chrysotile	1% Cellulose 95% Non-Fibrous
Total Asbestos: 4%					
Chrysotile present in pale beige brittle to coarse powder texturing compound-type (main) layer.					
24-10-02952-015	15		Pale Beige Brittle to Coarse Powder; Pale Mauve Pliable to Brittle; Inhomogeneous	4% Chrysotile	2% Cellulose 94% Non-Fibrous
Total Asbestos: 4%					
Chrysotile present in pale beige brittle to coarse powder texturing compound-type (main) layer.					
24-10-02952-016	16		Pale Beige Brittle to Coarse Powder; White Pliable to Brittle; Inhomogeneous	4% Chrysotile	1% Cellulose 95% Non-Fibrous
Total Asbestos: 4%					
Chrysotile present in pale beige brittle to coarse powder texturing compound-type (main) layer.					
24-10-02952-017	17		Pale Beige Brittle to Coarse Powder; White Pliable to Brittle; Inhomogeneous	4% Chrysotile	2% Cellulose 94% Non-Fibrous
Total Asbestos: 4%					
Chrysotile present in pale beige brittle to coarse powder texturing compound-type (main) layer.					

Environmental Hazards Services, L.L.C

Client Number: 05-5650
 Project/Test Address: 014-24091; Commercial Property; 887
 Fulton Street

Report Number: 24-10-02952

Lab Sample Number	Client Sample Number	Layer Type	Lab Gross Description	Asbestos	Other Materials
24-10-02952-018	18		Off-White Brittle to Coarse Powder; Beige Pliable to Brittle; Inhomogeneous	4% Chrysotile	1% Cellulose 95% Non-Fibrous
				Total Asbestos: 4%	
Chrysotile present in off-white brittle to coarse powder texturing compound-type (main) layer.					
24-10-02952-019	19		Off-White Brittle to Coarse Powder; Beige Pliable to Brittle; Inhomogeneous	4% Chrysotile	1% Cellulose 95% Non-Fibrous
				Total Asbestos: 4%	
Chrysotile present in off-white brittle to coarse powder texturing compound-type (main) layer.					
24-10-02952-020	20		Beige/Tan Fibrous; Inhomogeneous	NAD	60% Cellulose 30% Synthetic 10% Non-Fibrous
24-10-02952-021	21		Beige to Dark Gray Fibrous; Homogeneous	NAD	85% Cellulose 15% Non-Fibrous
24-10-02952-022	22		Beige Fibrous; Off-White Pliable; Inhomogeneous	NAD	75% Cellulose 25% Non-Fibrous
24-10-02952-023	23		Beige/Gray-Green/Off-White Fibrous; Inhomogeneous	NAD	80% Cellulose 20% Non-Fibrous
24-10-02952-024	24		Tan Fibrous; Off-White Pliable; Inhomogeneous	NAD	75% Cellulose 25% Non-Fibrous

Environmental Hazards Services, L.L.C

Client Number: 05-5650
 Project/Test Address: 014-24091; Commercial Property; 887
 Fulton Street

Report Number: 24-10-02952

Lab Sample Number	Client Sample Number	Layer Type	Lab Gross Description	Asbestos	Other Materials
24-10-02952-025	25		Beige Fibrous; Dark Pink Pliable to Brittle; Inhomogeneous	NAD	30% Cellulose 40% Synthetic 30% Non-Fibrous
24-10-02952-026	26		Beige Fibrous; Gray Pliable to Brittle; Inhomogeneous	NAD	75% Cellulose 25% Non-Fibrous
24-10-02952-027	27		Tan/Brown-Gray Fibrous; White Brittle; Inhomogeneous	NAD	75% Cellulose 25% Non-Fibrous
24-10-02952-028	28		Tan Fibrous; Off-White Brittle; Inhomogeneous	NAD	90% Cellulose 10% Non-Fibrous
24-10-02952-029	29		Tan Fibrous; Off-White Brittle; Inhomogeneous	NAD	90% Cellulose 10% Non-Fibrous
24-10-02952-030	30		Pale Gray Fibrous; White Brittle; Inhomogeneous	NAD	45% Cellulose 30% Fibrous Glass 25% Non-Fibrous
24-10-02952-031	31		Pale Pink Brittle; Tan Fibrous; White Vinyl-Like; Translucent Adhesive; Inhomogeneous	NAD	30% Cellulose 5% Fibrous Glass 65% Non-Fibrous

Environmental Hazards Services, L.L.C

Client Number: 05-5650
 Project/Test Address: 014-24091; Commercial Property; 887
 Fulton Street

Report Number: 24-10-02952

Lab Sample Number	Client Sample Number	Layer Type	Lab Gross Description	Asbestos	Other Materials
24-10-02952-032	32		Pale Pink Brittle; Tan Fibrous; White Vinyl-Like; Translucent Adhesive; Inhomogeneous	NAD	40% Cellulose 3% Fibrous Glass 57% Non-Fibrous
24-10-02952-033A	33	Flooring	Dark Brown Granular; Homogeneous	4% Chrysotile	96% Non-Fibrous
				Total Asbestos: 4%	
24-10-02952-033B	33	Mastic	Black Adhesive; Homogeneous	4% Chrysotile	3% Cellulose 93% Non-Fibrous
				Total Asbestos: 4%	
24-10-02952-034A	34	Flooring	Gray/Beige Granular; Homogeneous	5% Chrysotile	95% Non-Fibrous
				Total Asbestos: 5%	
24-10-02952-034B	34	Mastic	Black Adhesive; Homogeneous	4% Chrysotile	2% Cellulose 94% Non-Fibrous
				Total Asbestos: 4%	
24-10-02952-035	35		Pale Beige-Gray Vinyl-Like; Homogeneous	6% Chrysotile	94% Non-Fibrous
				Total Asbestos: 6%	
Insufficient quantity of mastic on flooring sample for analysis of mastic.					
24-10-02952-036A	36	Flooring	Pale Beige Vinyl-Like; Homogeneous	5% Chrysotile	95% Non-Fibrous
				Total Asbestos: 5%	
24-10-02952-036B	36	Mastic	Pale Beige Adhesive; Homogeneous	4% Chrysotile	2% Cellulose 94% Non-Fibrous
				Total Asbestos: 4%	

Environmental Hazards Services, L.L.C

Client Number: 05-5650
 Project/Test Address: 014-24091; Commercial Property; 887
 Fulton Street

Report Number: 24-10-02952

Lab Sample Number	Client Sample Number	Layer Type	Lab Gross Description	Asbestos	Other Materials
24-10-02952-037A	37	Flooring	Dark Brown Granular; Homogeneous	4% Chrysotile	96% Non-Fibrous
				Total Asbestos: 4%	
24-10-02952-037B	37	Mastic	Black Adhesive; Homogeneous	4% Chrysotile	2% Cellulose 94% Non-Fibrous
				Total Asbestos: 4%	
24-10-02952-038A	38	Flooring	Pale Beige Vinyl-Like; Homogeneous	NAD	100% Non-Fibrous
24-10-02952-038B	38	Mastic	Pale Beige Adhesive; Homogeneous	NAD	2% Cellulose 98% Non-Fibrous
24-10-02952-039A	39	Flooring	Beige Granular; Homogeneous	4% Chrysotile	96% Non-Fibrous
				Total Asbestos: 4%	
24-10-02952-039B	39	Mastic	Black Adhesive; Homogeneous	4% Chrysotile	4% Cellulose 92% Non-Fibrous
				Total Asbestos: 4%	
24-10-02952-040A	40	Flooring	Teal Granular; Homogeneous	4% Chrysotile	96% Non-Fibrous
				Total Asbestos: 4%	
24-10-02952-040B	40	Mastic	Black Adhesive; Homogeneous	5% Chrysotile	2% Cellulose 93% Non-Fibrous
				Total Asbestos: 5%	

Environmental Hazards Services, L.L.C

Client Number: 05-5650
 Project/Test Address: 014-24091; Commercial Property; 887
 Fulton Street

Report Number: 24-10-02952

Lab Sample Number	Client Sample Number	Layer Type	Lab Gross Description	Asbestos	Other Materials
24-10-02952-041A	41	Flooring	Pale Gray/Off-White/Black Vinyl-Like; Homogeneous	NAD	1% Cellulose 99% Non-Fibrous
24-10-02952-041B	41	Mastic	Brown Adhesive; Homogeneous	NAD	3% Cellulose 4% Talc 93% Non-Fibrous
24-10-02952-042	42		Brown Adhesive; Homogeneous	NAD	2% Cellulose 98% Non-Fibrous
24-10-02952-043	43		Brown Adhesive; Homogeneous	NAD	3% Cellulose 1% Fibrous Glass 1% Synthetic 2% Wollastonite 3% Talc 90% Non-Fibrous
24-10-02952-044	44		Brown/Translucent to Yellow Adhesive; Inhomogeneous	NAD	2% Cellulose 1% Synthetic 1% Wollastonite 4% Talc 92% Non-Fibrous
24-10-02952-045	45		Brown Adhesive; Homogeneous	NAD	1% Cellulose 7% Talc 92% Non-Fibrous
24-10-02952-046	46		Beige Adhesive; Homogeneous	NAD	100% Non-Fibrous

Environmental Hazards Services, L.L.C

Client Number: 05-5650
 Project/Test Address: 014-24091; Commercial Property; 887
 Fulton Street

Report Number: 24-10-02952

Lab Sample Number	Client Sample Number	Layer Type	Lab Gross Description	Asbestos	Other Materials
24-10-02952-047	47		Beige Fibrous; Pale Beige Pliable to Brittle; Inhomogeneous	NAD	70% Cellulose 30% Non-Fibrous
24-10-02952-048	48		Beige Fibrous; Pale Beige Pliable to Brittle; Inhomogeneous	NAD	70% Cellulose 30% Non-Fibrous
24-10-02952-049	49		Off-White Brittle; Beige Fibrous; Pale Beige Pliable to Brittle; Inhomogeneous	8% Chrysotile	20% Cellulose 40% Fibrous Glass 32% Non-Fibrous
				Total Asbestos: 8%	
Chrysotile present in off-white brittle mudded TSI-type (main) layer.					
24-10-02952-050	50		Off-White/White Fibrous; Pale Yellow Adhesive; Silver Metallic; Inhomogeneous	NAD	55% Cellulose 25% Fibrous Glass 20% Non-Fibrous
24-10-02952-051	51		Beige Fibrous; Pale Beige Pliable to Brittle; Inhomogeneous	NAD	75% Cellulose 25% Non-Fibrous
24-10-02952-052	52		Gray Cementitious; Light Pink Pliable to Brittle; Inhomogeneous	NAD	100% Non-Fibrous
24-10-02952-053	53		Gray Cementitious; Light Pink Pliable to Brittle; Inhomogeneous	NAD	100% Non-Fibrous

Environmental Hazards Services, L.L.C

Client Number: 05-5650
 Project/Test Address: 014-24091; Commercial Property; 887
 Fulton Street

Report Number: 24-10-02952

Lab Sample Number	Client Sample Number	Layer Type	Lab Gross Description	Asbestos	Other Materials
24-10-02952-054	54		Gray Cementitious; Light Pink Pliable to Brittle; Inhomogeneous	NAD	100% Non-Fibrous
24-10-02952-055	55		Dark Brown/Black Fibrous; Black Pliable to Brittle; White Pliable; Off-White Aggregate; Inhomogeneous	15% Chrysotile	15% Cellulose 5% Fibrous Glass 65% Non-Fibrous
				Total Asbestos: 15%	
Chrysotile present in dark brown fibrous felt-type layers throughout sample.					
24-10-02952-056	56		Black Brittle; Homogeneous	NAD	1% Cellulose 99% Non-Fibrous
24-10-02952-057	57		Black/Silver Pliable to Brittle; Inhomogeneous	NAD	25% Cellulose 75% Non-Fibrous
24-10-02952-058	58		Black Pliable to Brittle; Homogeneous	NAD	30% Cellulose 70% Non-Fibrous
24-10-02952-059	59		Black Pliable to Brittle; Homogeneous	NAD	15% Cellulose 3% Fibrous Glass 82% Non-Fibrous
24-10-02952-060	60		Black to Gray Pliable to Brittle; Homogeneous	8% Chrysotile	2% Cellulose 90% Non-Fibrous
				Total Asbestos: 8%	

Environmental Hazards Services, L.L.C

Client Number: 05-5650
 Project/Test Address: 014-24091; Commercial Property; 887
 Fulton Street

Report Number: 24-10-02952

Lab Sample Number	Client Sample Number	Layer Type	Lab Gross Description	Asbestos	Other Materials
24-10-02952-061	61		Off-White/Pale Gray Cementitious; Homogeneous	NAD	100% Non-Fibrous
24-10-02952-062A	62	Flooring	Dark Brown/Beige Granular; Homogeneous	4% Chrysotile	96% Non-Fibrous
Total Asbestos:				4%	
24-10-02952-062B	62	Mastic	Black Adhesive; Homogeneous	4% Chrysotile	3% Cellulose 93% Non-Fibrous
Total Asbestos:				4%	

QC Sample: 98-M22012-1, 99-M22012-2
 QC Blank: SRM 1866 Fiberglass
 Reporting Limit: 1% Asbestos
 Method: EPA Method 600/R-93/116, EPA Method 600/M4-82-020
 Analyst: Mark Case

Reviewed By Authorized Signatory: Melissa Kanode
 Melissa Kanode
 QA/QC Clerk

These results are based on a comparative visual estimate. The condition of the samples analyzed was acceptable upon receipt per laboratory protocol unless otherwise noted on this report. Each distinct component in an inhomogeneous sample was analyzed separately and reported as a composite. Results represent the analysis of samples submitted by the client. Sample location, description, area, volume, etc., was provided by the client. This report cannot be used by the client to claim product endorsement by NVLAP or any agency of the U.S. Government. This report shall not be reproduced except in full, without the written consent of the Environmental Hazards Service, L.L.C. All information concerning sampling location, date, and time can be found on Chain-of-Custody. Environmental Hazards Services, L.L.C. does not perform any sample collection. . NVLAP #101882-0 VELAP 460172

Environmental Hazards Services, L.L.C. recommends reanalysis by point count (for more accurate quantification) or Transmission Electron Microscopy (TEM), (for enhanced detection capabilities) for materials regulated by EPA NESHAP (National Emission Standards for Hazardous Air Pollutants) and found to contain less than ten percent (<10%) asbestos by polarized light microscopy (PLM). Both services are available for an additional fee.

400 Point Count Analysis, where noted, performed per EPA Method 600/R-93/116 with a Reporting Limit of 0.25%.

LEGEND: NAD = no asbestos detected

E.H.S. LABORATORY #

Page 1 of 2

EPA 600 PLM ASBESTOS SAMPLE

CHAIN OF CUSTODY

Client Name: **Krazan & Associates, Inc.**
Address: **215 West Dakota Avenue**

Contact: **Jeff Noël**
City: **Clovis**

Phone: **(559) 348-2200**
State: **California**

PROJECT NAME: _____

PROJECT ID #: **014-24091**

DATE SAMPLED: _____

SAMPLES RECVD (#): _____

CONDITION: _____

SAMPLES ACCEPTED (Y/N): _____

24-10-02952



3-DAY / 5-Day

Due Date:

10/22/2024

(Tuesday)

EL

E.H.S. Sample #	Client ID#	Sample Location	Sample Description	E.H.S. Sample #	Client ID#	Sample Location	Sample Description
1	31	887 Fulton Street	Plaster	31	887 Fulton Street	2-ft by 4-ft Ceiling panel	
2	32		Plaster	32		2-ft by 4-ft Ceiling panel	
3	33		Plaster	33		9-in by 9-in Floor tile / mastic	
4	34		Skim coat	34		9-in by 9-in Floor tile / mastic	
5	35		Skim coat	35		9-in by 9-in Floor tile / mastic	
6	36		Skim coat	36		9-in by 9-in Floor tile / mastic	
7	37		Gypsum board	37		9-in by 9-in Floor tile / mastic	
8	38		Gypsum board / taping material	38		9-in by 9-in Floor tile / mastic	
9	39		Gypsum board / taping material	39		9-in by 9-in Floor tile / mastic	
10	40		Gypsum board / taping material	40		9-in by 9-in Floor tile / mastic	
11	41		Gypsum board / taping material	41		9-in by 9-in Floor tile / mastic	
12	42		Gypsum board / taping material	42		Stair tread	
13	43		Gypsum board / taping material	43		Ceiling tile mastic	
14	44		Texture	44		Base cove mastic	
15	45		Texture	45		Base cove mastic	
16	46		Texture	46		Base cove mastic	
17	47		Texture	47		Paneling mastic	
18	48		Texture	48		Ducting tape	
19	49		Texture	49		Ducting tape	
20	50		Wallpaper	50		Pipe elbow	
21	51		Wallpaper	51		Insulation wrap	
22	52		Wallpaper	52		Insulation wrap	
23	53		Wallpaper	53		Stucco	
24	54		Wallpaper	54		Stucco	
25	55		Wallpaper	55		Stucco	
26	56		Wallpaper	56		Roof core	
27	57		Wallpaper	57		Roof tar	
28	58		12-in by 12-in Ceiling tile	58		Roof mastic	
29	59		12-in by 12-in Ceiling tile	59		Roof mastic	
30	60		12-in by 12-in Ceiling tile	60		Roof mastic	

ENVIRONMENTAL HAZARD SERVICES, L.L.C.

7469 WHITE PINE ROAD

RICHMOND, VA 23237

PHONE (804) 275-4788 FAX (804) 275-4907

RELINQUISHED BY: *[Signature]*

RECEIVED AT E.H.S. BY: *[Signature]*

DATE: 10/19/24

DATE: 10/15/24

Appendix B

DEPARTMENT OF INDUSTRIAL RELATIONS

Division of Occupational Safety and Health-Asbestos & Carcinogen Unit

1750 Howe Avenue, Suite 460

Sacramento, CA 95825

(916) 574-2993 Office <http://www.dir.ca.gov/dosh/asbestos.html> actu@dir.ca.gov



009132828C

210

August 21, 2024

Jeffrey Ronald Noel
1055 Chennault Avenue
Clovis CA 93611

Dear Certified Asbestos Consultant or Technician:

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

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

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

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

Please contact our office at the above address or email w any changes in your contact/ mailing information within 15 days of the change.

Sincerely,

Dean Mochrie, CAC
Senior Safety Engineer

Attachment: Certification Card

cc: File

Renewal - Card Attached (08/24)


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

Jeffrey Ronald Noel
Name

Certification No. 00-2828

Expires on 10/18/25

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



**LEAD-BASED PAINT SURVEY
COMMERCIAL PROPERTY
887 FULTON STREET
FRESNO, CALIFORNIA**

Project No. 014-25015
July 22, 2025

Prepared for:
Dora Westerlund
Fresno Area Hispanic Foundation
1444 Fulton Street
Fresno, California 93721
(559) 222-8705

Prepared by:
Krazan & Associates, Inc.
215 West Dakota Avenue
Clovis, California 93612
(559) 348-2200

TABLE OF CONTENTS
Project No. 014-25015

	Page
1.0 INTRODUCTION	1
2.0 PURPOSE AND SCOPE OF WORK.....	1
3.0 BUILDING DESCRIPTION.....	1
4.0 INVESTIGATIVE METHODS	2
4.1 Sampling Protocols	2
4.2 Laboratory Analytical Methods	2
5.0 RESULTS OF INVESTIGATION	2
6.0 CONCLUSIONS	3
7.0 LIMITATIONS	4

Figures

Lead-Based Paint Survey Results (Table I).....	following text
Floor Plan with Sample Locations	following Results

Appendices

Analytical Results and Chain-of-Custody Record	A
DPH Certifications	B

July 22, 2025

Project No. 014-25015

**LEAD-BASED PAINT SURVEY
COMMERCIAL PROPERTY
887 FULTON STREET
FRESNO, CALIFORNIA**

1.0 INTRODUCTION

This report presents the results of our lead-based paint survey for the structure located at 887 Fulton St. in Fresno, California. The lead-based paint survey was conducted under the conditions of Krazan & Associates, Inc.'s (Krazan's) Proposal No. P25-287, dated June 24, 2025. Dora Westerlund gave written authorization on July 3, 2025, for Krazan to proceed with the lead-based paint survey.

2.0 PURPOSE AND SCOPE OF WORK

The purpose of the lead-based paint survey was to identify and quantify the presence of potential lead-based paints (LBPs) at the on-site structure. The scope of work for the limited LBP survey included conducting a visual survey of the structure, conducting bulk sampling and analysis of materials suspected to contain lead.

3.0 BUILDING DESCRIPTION

The structure was a two-story structure with basement, stucco, brick, and ceramic tiled exterior walls, with mineral surface rolled roofing. Interior construction included gypsum board, acoustic ceiling tiles, plaster, and suspended ceilings with two-foot by four-foot ceiling panels; gypsum board, plaster, wood, brick, concrete block, open-framed, and ceramic tiled walls; and concrete floors overlain (in areas) by wall-to-wall carpeting, floor tiles, ceramic tiles, and terrazzo.

4.0 INVESTIGATIVE METHODS

4.1 Sampling Protocols

Thirty (30) samples of suspected LBPs were collected from the on-site structure. Representative samples were collected from painted surfaces that visually appeared to contain various types of paint. Every attempt was made to identify unique paint and/or surface types. However, a chance exists that: 1) different paints are not visually distinct, 2) hidden surfaces exist, or 3) areas that were painted with different and distinct paint types are now covered by a single overlay. Sample locations for this survey were determined by the inspector and were selected in a random fashion after homogeneous areas were identified.

Sample locations for this survey were chosen in a semi-random fashion with emphasis placed on minimizing damage to the sampled materials. The samples were collected by carefully removing a small amount of the suspect material, with every attempt to separate the paint from the substrate. If possible, samples were collected from existing damaged areas or loose pieces of materials. Each sample was placed in a separate sealed plastic bag, and labeled with the project number and sample number.

4.2 Laboratory Analytical Methods

Paint chip samples were analyzed by Environmental Hazards Services of Richmond, Virginia, to detect the presence of total lead in accordance with EPA Method 7420. Copies of the analytical results and Chain-of-Custody Record are included in Appendix A.

5.0 RESULTS OF INVESTIGATION

As stated previously, 30 samples of suspected LBPs were collected from throughout the structure. Analytical laboratory results and field observations of the materials sampled have been summarized on Table I, following the text of this report. Information presented within the table includes the sample number, the room equivalent, building component, substrate, testing location, lead content, the volume of LBP identified (typically expressed in square feet), and the condition of the material sampled. In addition, footnotes have been provided to convey pertinent information regarding the specific sample.

The following paints contained 0.5% or greater total lead by weight and are defined as lead-based paint:

Pink gypsum board wall – 2nd floor (Sample No. 4)

Pink wood partition wall – 1st floor (Sample No. 20)

The following paints contained greater than 0.06% total lead by weight and are defined as lead-containing paint:

Tan wood door frame – 2nd floor (Sample No. 3)

Pink wood trim – 2nd floor (Sample No. 5)

Tan wood partition wall – 2nd floor (Sample No. 7)

Red brick wall – 2nd floor (Sample No. 8)

Yellow plaster wall – 2nd floor (Sample No. 10)

Off-white gypsum board wall – 2nd floor (Sample No. 11)

Tan gypsum board wall – 2nd floor (Sample No. 12)

Off-white gypsum board wall – 1st floor (Sample No. 15)

Pink gypsum board ceiling – 1st floor (Sample No. 16)

Tan gypsum board wall – basement (Sample No. 22)

Tan plaster wall – basement (Sample No. 23)

Off-white plaster wall – basement (Sample No. 24)

Tan wood door frame – basement (Sample No. 26)

The paints on the exterior and interior of the building surveyed were generally in fair condition.

6.0 CONCLUSIONS

Occupational exposure to lead is regulated by both the Federal Occupational Safety and Health Administration (OSHA) (29 CFR 1926.62) and California OSHA (Title 8, GISO 5198 and CSO 1532.1). Based on Federal and California OSHA, when disturbing paints which contain lead (any amount of detectable lead), the above-noted OSHA and California OSHA regulations should be followed. Furthermore, the United States Department of Housing and Urban Development (HUD) publication entitled "Guidelines for the Evaluation and Control of Lead-Based Paint Hazards in Housing," dated 1995, outlines specific guidelines for disrupting paint with lead in excess of 5,000 mg/kg (lead-based paint). These guidelines have been developed primarily to address conditions within buildings utilized for residential purposes. In addition, industry accepted standards also suggest that building owners notify occupants regarding the presence, location, and extent of lead-based paints. Records of all notifications and reports must be maintained for the duration of ownership and must be transferred to successive owners.

All construction work where an employee may be occupationally exposed to lead containing paint, including building renovation and demolition, must comply with OSHA Regulation 29 CFR 1926.62 and California OSHA Title 8, CSO 1532.1. This regulation requires initial employee exposure monitoring to evaluate worker exposure during work that disturbs lead containing paint. Krazan suggests that engineering controls and air monitoring for airborne lead be conducted at the start of projects in which worker exposure to lead containing paint is likely.

Demolition of buildings containing lead-based paint is not specifically regulated by the San Joaquin Valley Air Pollution Control District (APCD). General requirements for building demolition, however, such as dust control, must be strictly followed. Also, building components which have been identified as being coated with LBPs must be handled and disposed of as a Hazardous Waste and cannot be discarded as general construction debris.

7.0 LIMITATIONS

This survey and review of the subject property has been limited in scope. This investigation is undertaken with the calculated risk that the presence, full nature, and extent of lead-containing paints would not be revealed by visual observation and sampling alone. Krazan & Associates, Inc. makes no representation as to the lead content of paints not sampled or that were inaccessible to our inspector.

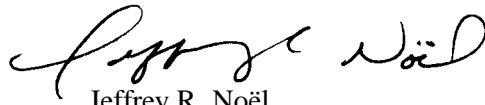
The findings of this report were based upon the results of our site inspection, paint chip sampling, along with the interpretation of paint chip analysis results. Lead-paint testing was done by a laboratory certified by the State of California Department of Public Health (DPH) and accredited as an AIHA Environmental Lead Laboratory Accreditation Program (ELLAP) laboratory. Therefore, the data are accurate only to the degree implied by review of the data obtained and by professional interpretation, and the degree of care of ensuring the testing accuracy and the representative nature of the samples obtained. The findings presented herewith are based on professional interpretation using state of the art methods and equipment and a degree of conservatism deemed proper as of this report date. It is not warranted that such data cannot be superseded by future environmental or technical developments.

This lead-based paint survey is not intended to be the sole basis of lead paint removal bids. Confirmation of specific lead-based paint and volumes should be conducted by prospective removal contractors prior to accepting removal bids. This report is provided for the exclusive use of the client noted on the cover page and is subject to the terms and conditions in the applicable contract between the client and Krazan. The

client is the only party to whom Krazan has explained the risks involved and has been involved in the shaping of the scope of services needed to satisfactorily manage those risks, if any, from the client's point of view. Any third party use of this report, including use by Client's lender, prospective purchaser, or lessee will be subject to the terms and conditions governing the contractual work in the contract between the client and Krazan. The unauthorized use of, release of, or reliance on the information contained in this report, without the expressed written consent of Krazan & Associates, Inc., is strictly prohibited and will be without risk or liability to Krazan.

If you have any questions or if we may be of further assistance, please do not hesitate to contact our office at (559) 348-2200.

Respectfully submitted,
KRAZAN & ASSOCIATES, INC.



Jeffrey R. Noël
DPH Certified Lead Inspector/Assessor
LRC-00003853

JRN/mlt

TABLE I
LEAD-BASED PAINT SURVEY RESULTS
Commercial Property
887 Fulton Street
Fresno, California
July 10, 2025 Sampling

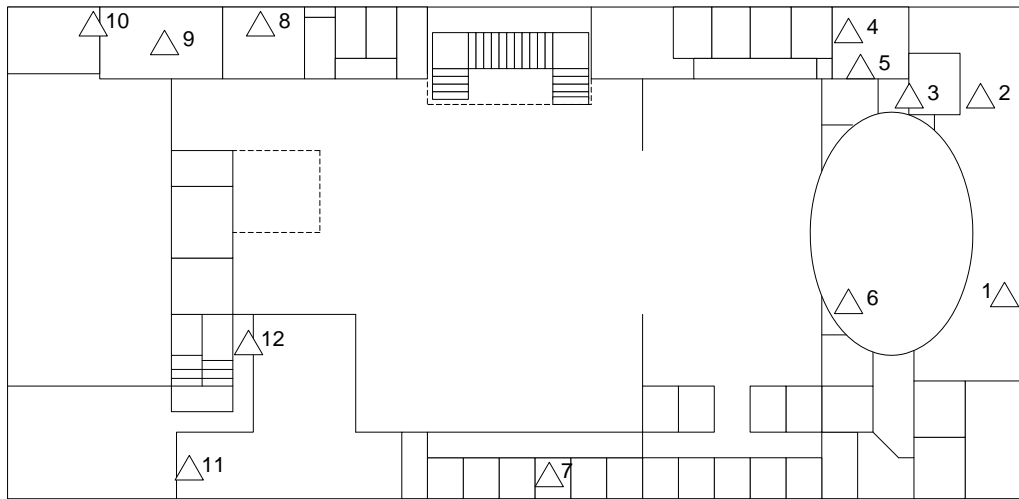
Sample No.	Sample Location	Paint Sampled	Lead content % by weight	Volume est. in sq. ft.	Condition	Notes/ Additional locations
1	2nd Floor	brick wall	0.0067	NC	good	off-white
2	2nd Floor	gypsum board wall	<0.0046	NC	good	off-white
3	2nd Floor	wood door frame	0.46	NC	good	tan
4	2nd Floor	gypsum board wall	0.74	400	good	pink
5	2nd Floor	wood trim	0.30	NC	good	pink
6	2nd Floor	gypsum board wall	<0.0047	NC	good	tan
7	2nd Floor	wood partition wall	0.010	NC	good	tan
8	2nd Floor	brick wall	0.27	NC	good	red
9	2nd Floor	gypsum board ceiling	<0.0045	NC	poor	pink
10	2nd Floor	plaster wall	0.10	NC	poor	yellow
11	2nd Floor	gypsum board wall	0.23	NC	good	off-white
12	2nd Floor	gypsum board wall	0.44	NC	good	tan
13	1st Floor	plaster wall	<0.0048	NC	good	tan
14	1st Floor	gypsum board ceiling	0.0086	NC	poor	tan
15	1st Floor	gypsum board wall	0.14	NC	good	off-white
16	1st Floor	gypsum board ceiling	0.039	NC	good	pink
17	1st Floor	gypsum board wall	<0.0045	NC	good	green
18	1st Floor	wood door frame	<0.0041	NC	good	off-white
19	1st Floor	gypsum board wall	0.0051	NC	good	off-white
20	1st Floor	wood partition wall	1.3	200	good	pink
21	1st Floor	gypsum board wall	<0.0043	NC	good	off-white
22	Basement	gypsum board wall	0.087	NC	good	tan
23	Basement	plaster wall	0.043	NC	good	tan
24	Basement	plaster wall	0.22	NC	poor	off-white
25	Basement	gypsum board wall	<0.0046	NC	fair	tan
26	Basement	wood door frame	0.47	NC	good	tan
27	Basement	concrete wall	0.0055	NC	good	tan
28	Basement	gypsum board ceiling	<0.0044	NC	good	tan
29	Exterior	metal framing	<0.0047	NC	good	green
30	Exterior	brick wall	<0.0040	NC	good	green

NOTE: Lead-based paint is defined as paint containing 0.5% or greater lead by weight. NC = Not calculated

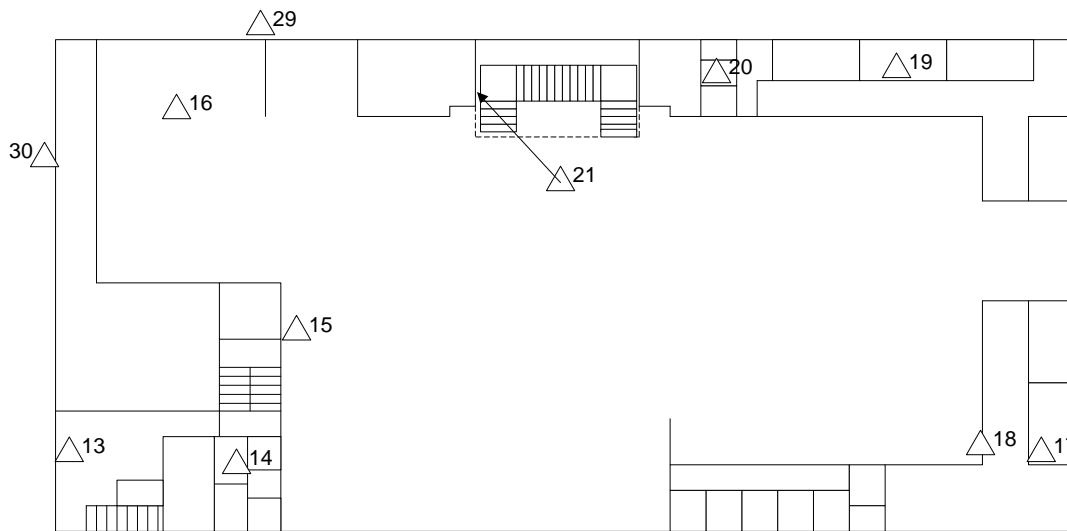
Lead containing paint is defined as paint containing greater than 0.06% lead by weight.

Bold text items are considered Lead-based paint

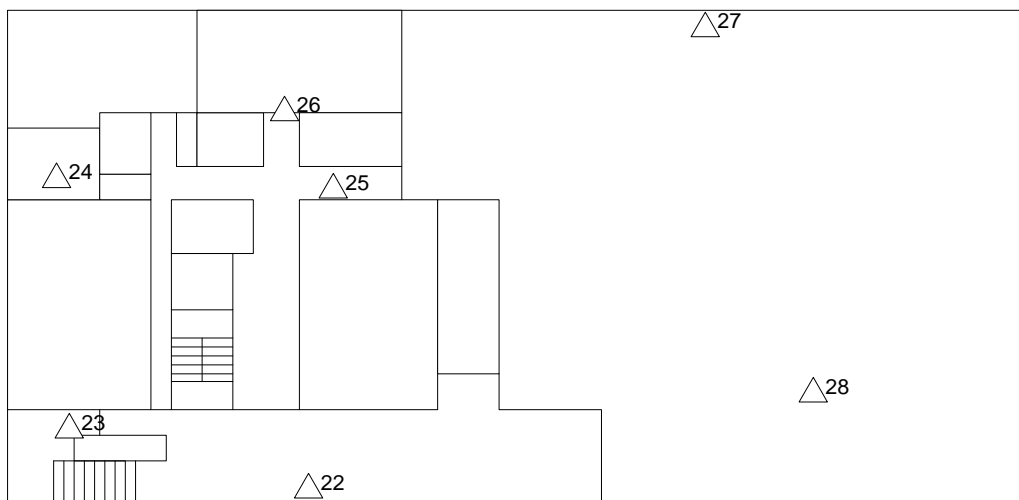
Italic text items are considered Lead-containing paint



Second Floor



First Floor



Basement Level

EXPLANATION

△ PAINT SAMPLE LOCATION

FLOOR PLAN WITH
PAINT SAMPLE LOCATIONS

COMMERCIAL PROPERTY
887 FULTON MALL
FRESNO, CALIFORNIA

Scale:
NOT TO SCALE

Drawn by:
J. R. N.

Project No.
014-25015

Date:
7 / 25

Approved by:
J.R.N

Figure No.
1



Appendix A



Lead Paint Chip Analysis Report

Report Number: 25-07-02051

Client: Krazan & Associates Inc.
215 West Dakota Ave
Clovis, CA 93612

Received Date: 07/11/2025
Analyzed Date: 07/18/2025
Reported Date: 07/18/2025

Project/Test Address: 014-25015; Commercial Property; 887 Fulton Street
Collection Date: 07/10/2025

Client Number:
05-5650

Laboratory Results

Fax Number:
559-348-2201

Lab Sample Number	Client Sample Number	Collection Location	Pb (ug/g) ppm	% Pb by Wt.	Narrative ID
25-07-02051-001	1		67	0.0067	
25-07-02051-002	2		<46	<0.0046	
25-07-02051-003	3		4600	0.46	
25-07-02051-004	4		7400	0.74	
25-07-02051-005	5		3000	0.30	
25-07-02051-006	6		<47	<0.0047	
25-07-02051-007	7		100	0.010	
25-07-02051-008	8		2700	0.27	
25-07-02051-009	9		<45	<0.0045	
25-07-02051-010	10		1000	0.10	
25-07-02051-011	11		2300	0.23	

Environmental Hazards Services, L.L.C

Client Number: 05-5650

Report Number: 25-07-02051

Project/Test Address: 014-25015; Commercial Property; 887 Fulton Street

Lab Sample Number	Client Sample Number	Collection Location	Pb (ug/g) ppm	% Pb by Wt.	Narrative ID
25-07-02051-012	12		4400	0.44	
25-07-02051-013	13		<48	<0.0048	
25-07-02051-014	14		86	0.0086	
25-07-02051-015	15		1400	0.14	
25-07-02051-016	16		390	0.039	
25-07-02051-017	17		<45	<0.0045	
25-07-02051-018	18		<41	<0.0041	
25-07-02051-019	19		51	0.0051	
25-07-02051-020	20		13000	1.3	
25-07-02051-021	21		<43	<0.0043	
25-07-02051-022	22		870	0.087	
25-07-02051-023	23		430	0.043	
25-07-02051-024	24		2200	0.22	
25-07-02051-025	25		<46	<0.0046	
25-07-02051-026	26		4700	0.47	
25-07-02051-027	27		55	0.0055	
25-07-02051-028	28		<44	<0.0044	
25-07-02051-029	29		<47	<0.0047	

Environmental Hazards Services, L.L.C

Client Number: 05-5650

Report Number: 25-07-02051

Project/Test Address: 014-25015; Commercial Property; 887 Fulton Street

Lab Sample Number	Client Sample Number	Collection Location	Pb (ug/g) ppm	% Pb by Wt.	Narrative ID
25-07-02051-030	30		<40	<0.0040	

Sample Narratives:

Preparation Method: ASTM E-1979-17
Analysis Method: EPA SW846 7000B

Reviewed By Authorized Signatory: *Melissa Kanode*

Melissa Kanode
QA/QC Clerk

The Reporting Limit (RL) for samples prepared by ASTM E-1979-17 is 10.0 ug Total Pb. The RL for samples prepared by EPA SW846 3050B is 25.0 ug Total Pb. Paint chip area and results are calculated based on area measurements determined by the client. All internal quality control requirements associated with this batch were met, unless otherwise noted.

The condition of the samples analyzed was acceptable upon receipt per laboratory protocol unless otherwise noted on this report. Results represent the analysis of samples submitted by the client. Sample location, description, area, etc., was provided by the client. Results reported above in mg/cm³ are calculated based on area supplied by client. This report shall not be reproduced except in full, without the written consent of Environmental Hazards Services, L.L.C.

ELLAP Accreditation through AIHA LAP, LLC (100420), NY ELAP #11714.

LEGEND	Pb= lead	ug = microgram	ppm = parts per million
	ug/g = micrograms per gram	Wt. = weight	

CHAIN OF CUSTODY FORM

Company Name:	Krazan & Associates, Inc.	Date:	7/10/2025
Address:	215 West Dakota Avenue	Contact Name:	Jeff Noël
City, State, Zip:	Clovis, CA 93612	Sampler Name:	Jeff Noël
EHS Client Account #:	5-5650 D	Project #:	014-25015
Phone #:	(559) 348-2200	FAX:	(559) 348-2201
P.O. #:			Commercial Property 887 Fulton Street

25-07-02051



Due Date:
 07/18/2025
 (Friday)
 EL

Sample Number	Sample Date & Time	Asbestos					Lead							Other Metals <small>(Specify metals below)</small>			Particulate:	Total Number of Res	
		Bulk ID by PLM	(PCM) Fiber Count	PLM Point Count	PLM Gravimetric	TEM AHERA (Air)	TEM Chatfield (Bulk)	Air	Paint (%)	Paint (PPM)	Paint (mg/cm ²)	Soil	Wipe * (See Note)	TCLP (Pb)	Waste Water	TCLP RCRA 8	Welding Fume		Toxic Metal Profile
1	7/10/2025						X	X											
2	7/10/2025						X	X											
3	7/10/2025						X	X											
4	7/10/2025						X	X											
5	7/10/2025						X	X											
6	7/10/2025						X	X											
7	7/10/2025						X	X											
8	7/10/2025						X	X											
9	7/10/2025						X	X											
10	7/10/2025						X	X											
11	7/10/2025						X	X											
12	7/10/2025						X	X											
13	7/10/2025						X	X											
14	7/10/2025						X	X											
15	7/10/2025						X	X											
16	7/10/2025						X	X											
17	7/10/2025						X	X											
18	7/10/2025						X	X											
19	7/10/2025						X	X											
20	7/10/2025						X	X											

* Do wipe samples submitted meet ASTM E1792 requirements? Yes No

Released By: Jeff Noel	Signature:	Date: 7/10/25
Received By:	Signature:	Date: 7/11/25 329P

Appendix B

State of California Department of Public Health

Lead-Related
Construction
Certificate

Certificate
Type

Expiration
Date

Inspector/Assessor	01/04/2014
Supervisor	01/04/2014
Project Designer	01/04/2014



Jeffrey Noei

ID #: 7028

APPENDIX D - Cost Estimate for Alternatives 2 and 3

Description	Quantity	Unit	Unit Cost	Cost	Notes/Assumptions
Alternative 2 - Encasement / Enclosure					
Contractor mobilization/demobilization	1	LS	\$ 12,500.00	\$ 12,500	Subcontractor Bid
Permitting	1	LS	\$ 5,000.00	\$ 5,000	Project experience
Site Preparation and Security fencing	1	LS	\$ 7,500.00	\$ 7,500	Project experience
Removal of all interior finishes to expose stucture	1	LS	\$ 331,500.00	\$ 331,500	Subcontractor Bid
Limited Asbestos Abatement	1	LS	\$ 100,000.00	\$ 100,000	Does not remove all ACMs from building
Limited Roof Repair	1	LS	\$ 50,000.00	\$ 50,000	Project experience
Third Party clearance sampling/oversight	3	Week	\$ 17,500.00	\$ 52,500	Subcontractor Bid
Operations and Maintenance Requirements	30	Year	\$ 1,500.00	\$ 45,000	Assumed to require \$1,000 in annual maintenance and \$500 in annual notification requirements
Closure Reporting	1	LS	\$ 10,000.00	\$ 10,000	Project experience
<i>Alternative Subtotal</i>				\$ 614,000	
<i>Contingency</i>				10%	
<i>Alternative Total</i>				\$ 675,400	
Alternative 3 - Full Abatement					
Contractor mobilization/demobilization	2	LS	\$ 12,500.00	\$ 25,000	Subcontractor Bid
Permitting	1	LS	\$ 5,000.00	\$ 5,000	Project experience
Site Preparation and Security fencing	1	LS	\$ 7,500.00	\$ 7,500	Project experience
Asbestos abatement	1	LS	\$ 488,300.00	\$ 488,300	Subcontractor Bid
Removal of all interior finishes to expose stucture	1	LS	\$ 95,000.00	\$ 95,000	Subcontractor Bid
Roof Replacement	1	LS	\$ 350,000.00	\$ 350,000	Project experience + 40% contingency
Third Party clearance sampling/oversight	6	Week	\$ 17,500.00	\$ 105,000	Subcontractor Bid
Closure Reporting	1	LS	\$ 10,000.00	\$ 10,000	Project experience
<i>Alternative Subtotal</i>				\$ 1,085,800	
<i>Contingency</i>				10%	
<i>Alternative Total</i>				\$ 1,194,400	