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Attorneys for Defendants Joan Kevorkian, and George L. Wallet and Sara J. Wallet as Co-Trustees of the Bypass Trust Created Under the Corrine M. Wallet Separate Property Trust

SUPERIOR COURT OF CALIFORNIA

COUNTY OF FRESNO

CITY OF FRESNO, a municipal corporation,  
PEOPLE OF THE STATE OF CALIFORNIA

Petitioner,

vs.

JOAN KEVORKIAN, and GEORGE L. WALLET  
and SARA J. WALLET as CO-TRUSTEES of the  
BYPASS TRUST CREATED UNDER THE  
CORRINE M. WALLET SEPARATE PROPERTY  
TRUST, and DOES 1 THROUGH 50, inclusive

Respondents.

Case No. 21CECG02816

**DECLARATION OF JOHN H. FROST  
IN SUPPORT OF RESPONDENTS'  
OPPOSITION TO CITY OF FRESNO'S  
PETITION FOR APPOINTMENT OF A  
RECEIVER**

Hearing Date: November 10, 2021  
Time: 3:30 p.m.  
Dept.: 402

Date Action Filed: September 24, 2021

I, John H. Frost, state under penalty of perjury:

1. I am over the age of 18 and an architect licensed by the State of California (C8868).

My office is located in Fresno, California.

2. Except for those matters stated on information and belief, I have personal knowledge of the facts contained herein, and if called upon as a witness, I could testify competently thereto. With respect to those matters stated on information and belief, I believe them to be true and could testify competently thereto.

3. This Declaration is filed in support of Respondents' Opposition to the City of Fresno's Petition for Appointment of a Receiver. For the Court's convenience, I have divided this

1 Declaration into various sections, each dealing with a specific factual area.

2 **BACKGROUND AND EXPERIENCE**

3 4. I have been a practicing architect in the Fresno area for 45 years. During that time,  
4 I have worked with many project developers and owners in the improvement of their properties. A  
5 copy of my CV is attached hereto as Exhibit A.

6 5. I have successfully completed more than 120 projects including single-family  
7 residential, multi-family residential, commercial, industrial, and mobile home parks.

8 **NOTICE TO ABATE**

9 6. I was retained by the owners of the Trails End Mobile Home Park ("Trails End") to  
10 coordinate and assist the owners in their efforts to bring certain portions of the park into compliance  
11 with the requirements of the California Department of Housing and Community Development and  
12 to address some of the specific issues contained in the Notice to Abate ("Notice") issued by the  
13 City of Fresno pursuant to Health & Safety Code section 17980.6.

14 7. Officially contracted since September 9, 2021, (Advisory only contact since May 3,  
15 2021) I have actively worked with the Respondents and their onsite manager, Gilbert Delarosa, to  
16 correct some of the deficiencies set out in the Notice observed on September 16, 2021. Included in  
17 the work effort have been permits issued by the San Joaquin Valley Air Pollution Control District  
18 and the City of Fresno.

19 8. Response to Abatement Notice Issue 1. Excess trash, rubbish, tent-like structures,  
20 abandoned or inoperable vehicles and combustible materials from the common areas and the lots.  
21 At the direction of the Respondents, I observed the removal of some of inoperable vehicles and  
22 debris from the common area which was directed by the manager Gilbert Delarosa. The car removal  
23 and debris cleanup has been an ongoing process.

24 9. Response to Abatement Notice Issue 2. Abandoned or inoperable vehicles on the  
25 roadway, common areas and fire lanes. I understand the manager Gilbert Delarosa directed the  
26 removal and towing of operable and inoperable vehicles violating the posted notices within the No  
27 Parking Fire Lanes.

28 10. Response to Abatement Notice Issue 3. Mark roadways with areas of direction of

1 traffic, fire lanes and no parking signs. At the direction of the Respondents, I directed the hiring of  
2 Asphalt Technology, Inc. and all the pavement markings. I directed the placement of identification  
3 notices, barricades (w/tow signs) and the painting of the NO PARKING FIRE LANES, speed  
4 bumps and direction arrows in the driveways. Photographs of the typical pavement markings are  
5 attached hereto as Exhibit B.

6 11. Response to Abatement Notice Issue 4. Lot numbers are missing on some lots.  
7 At the direction of the Respondents, I assisted the on-site manager with placing lot numbers on all  
8 22 lots indicated in the Notice to Abate. All spaces within the mobile home park are now numbered.

9 12. Response to Abatement Notice Issue 5. Clear the debris from the five fire debris  
10 lots. I solicited cost proposal from Leon Environmental to take asbestos samples at the affected  
11 lots and coordinated the sampling and testing required for potential asbestos abatement of fire  
12 damaged units on lots 22, 23, 24, 27 and 28. The 'approvals' to take asbestos samples at the 1st Fire  
13 were delayed pending approvals from insurance investigators. I directed Leon Environmental to  
14 prepare reports to meet the requirements of the San Joaquin Valley Air Pollution Control District  
15 for permits. I solicited bids from two demolition companies to remove the debris piles, coordinated  
16 the bid award to Bowen Engineering & Environmental. Bowen was responsible for obtaining the  
17 demolition permits from the City of Fresno, Air Pollution, and the chain-of-custody of the debris  
18 to the disposal/recycling yards. I coordinated and observed the removal of all debris from the  
19 affected lots. Copies of the asbestos test reports and photographs of the cleared spaces are attached  
20 hereto as Exhibit C.

21 13. Response to Abatement Notice Issue 6. Clear the five mobile homes from the five  
22 fire lots. I solicited cost proposal from Leon Environmental to take asbestos samples at the affected  
23 lots and coordinated the sampling and testing required for potential asbestos abatement of fire  
24 damaged units on lots 22, 23, 24, 27 and 28. The 'approvals' to take asbestos samples at the 1st Fire  
25 were delayed pending approvals from insurance investigators. I directed Leon Environmental to  
26 prepare reports to meet the requirements of the San Joaquin Valley Air Pollution Control District  
27 for permits. I solicited bids from two demolition companies to remove the debris piles, coordinated  
28 the bid award to Bowen Engineering & Environmental. Bowen was responsible for obtaining the

1 demolition permits from the City of Fresno, Air Pollution, and the chain-of-custody of the debris  
2 to the disposal/recycling yards. I coordinated and observed the removal of the five mobile homes  
3 from the affected lots. Copies of the asbestos test reports and photographs of the cleared spaces are  
4 attached hereto as Exhibit C.

5 14. Response to Abatement Notice Issue 7. Roadways are damaged and deteriorated. I  
6 observed the various deteriorated conditions of the asphaltic pavement in the driveways throughout  
7 the Mobile Home Park, and advised the owners of the options to repair or replace the asphaltic  
8 concrete pavement. The park owner selected the repair option to help remedy the condition of the  
9 deteriorated asphaltic pavement (in part because replacement would have required engineered  
10 plans, plan check, back check, permits, inspections, As-graded plans, and a significant time delay).  
11 I negotiated the asphalt repair work with Asphalt Technology, Inc. The scope-of-work for the  
12 asphalt repairs was divided into four (4) Phases for the following reasons: 1) Trails End is occupied  
13 and repairing all the asphalt drives would significantly disrupt resident's daytime & overnight  
14 parking opportunities; 2) Much of the subgrade in the 4th Phase is remains saturated with water  
15 from the leaking mobile home in Space 15B (which is plumbed with purportedly unrepairable  
16 polypropylene pressurized water lines); 3) Equipment used during the demolition process for lots  
17 22, 23, 24, 27 and 28 included several excavators (with caterpillar tracks) and roll-off bins that  
18 would have damaged new asphaltic pavement repairs. I directed the asphalt repairs in the 1st Phase  
19 (i.e. the west driveway and 25% of the north driveway). Photographs of the completed paving work  
20 are attached hereto as Exhibit D.

21 15. Response to Abatement Notice Issue 8. Post the Emergency Preparedness Plan  
22 and a notice of where one can obtain a copy of the plan. At the direction of the Respondents, I  
23 assisted Gilbert Delarosa, the Trails End Mobile Home Park Manager, and observed his completing  
24 that project. Photographs of the emergency plan and posting are attached hereto as Exhibit E.

#### 25 **OTHER WORK PERFORMED**

26 16. The following generally outlines the Decision Process & Actions I personally took  
27 relating to additional items at the referenced property.

28 17. I solicited bids for Phase 2, Phase 3 & Phase 4 of the asphalt repairs (excluding over



1 excavating the subgrade in Phase 4, which still needs to be performed before paving can be  
2 completed).

3 18. Provided additional assistance to George Santikian (since 2016) & Emory Wishon  
4 (in 2021) for the upgrade of two existing 'wharf' fire hydrants to Fresno City Fire Prevention  
5 approved Hydrants.

6 19. Participate in negotiations with Pinedale Water District in 2017 regarding their  
7 request for an RP Device installation on the main water service. The domestic water and two  
8 existing fire hydrants are on the same 4" water line. Facilitated the installation of a new water meter  
9 on the existing 4" water line to replace an existing water meter that was restricting water flow at  
10 the fire hydrants.

11 20. Facilitated repairs and eventual replacement of east fence along Clark Avenue in  
12 2019.

13 21. Facilitated in the summer of 2021 the installation of a 10-gauge temporary power  
14 from a connected but underutilized meter panel (29B) to space 26 (adversely affected by the 1<sup>st</sup>  
15 Fire).

16 22. Determined the probable source of the water flooding the subgrade in the east  
17 driveway.

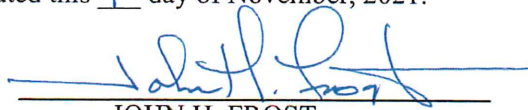
18 23. Prepared an individual 'space' evaluation survey (for 60 spaces) responding to many  
19 of the elements in the 'Abatement' Notice.

20 24. Prepared a Cost-to Cure to restore the (5 vacant fire damaged +2 occupied) spaces  
21 affected by the two 2021 fires.

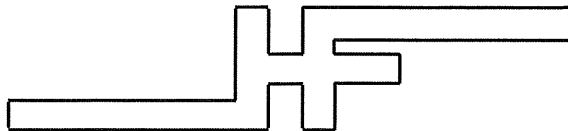
22 25. Assisted the owners with researching security and obtaining security guards.

23 26. Arrange for two Community furniture, trash, appliance, tire collection days on Nov.  
24 1st & 8th.

25 I declare under penalty of perjury under the laws of the State of California that the  
26 foregoing is true and correct. Executed this 1<sup>st</sup> day of November, 2021.

27  
28   
JOHN H. FROST

# **EXHIBIT A**



JOHN H. FROST, AIA • ARCHITECT

## RESUME

### QUALIFICATIONS:

- California Architect's License C8868 –1976
- Architect's License - Oregon, Montana, (via Reciprocity)
- California State General Contractor's License – 1982-2016 (Retired 2016)
- Teacher's Certificate (Lifetime) – California Community Colleges – 1974
- Bachelor of Architecture – University of Arizona –1972

### PROFESSIONAL & SERVICE ORGANIZATIONS:

- American Institute of Architects (Since 1976) (Treasurer 2005-2011)
- San Joaquin Chapter AIA (Since 1976)
  - Member of Board of Directors – Treasurer (Past Service)
    - Ethics & Practice
    - Energy Committee
    - Professional Development Committee
- Construction Specification Institute (Since 1981)
- North Fresno Rotary (Since 1985) – Secretary (Past Service)

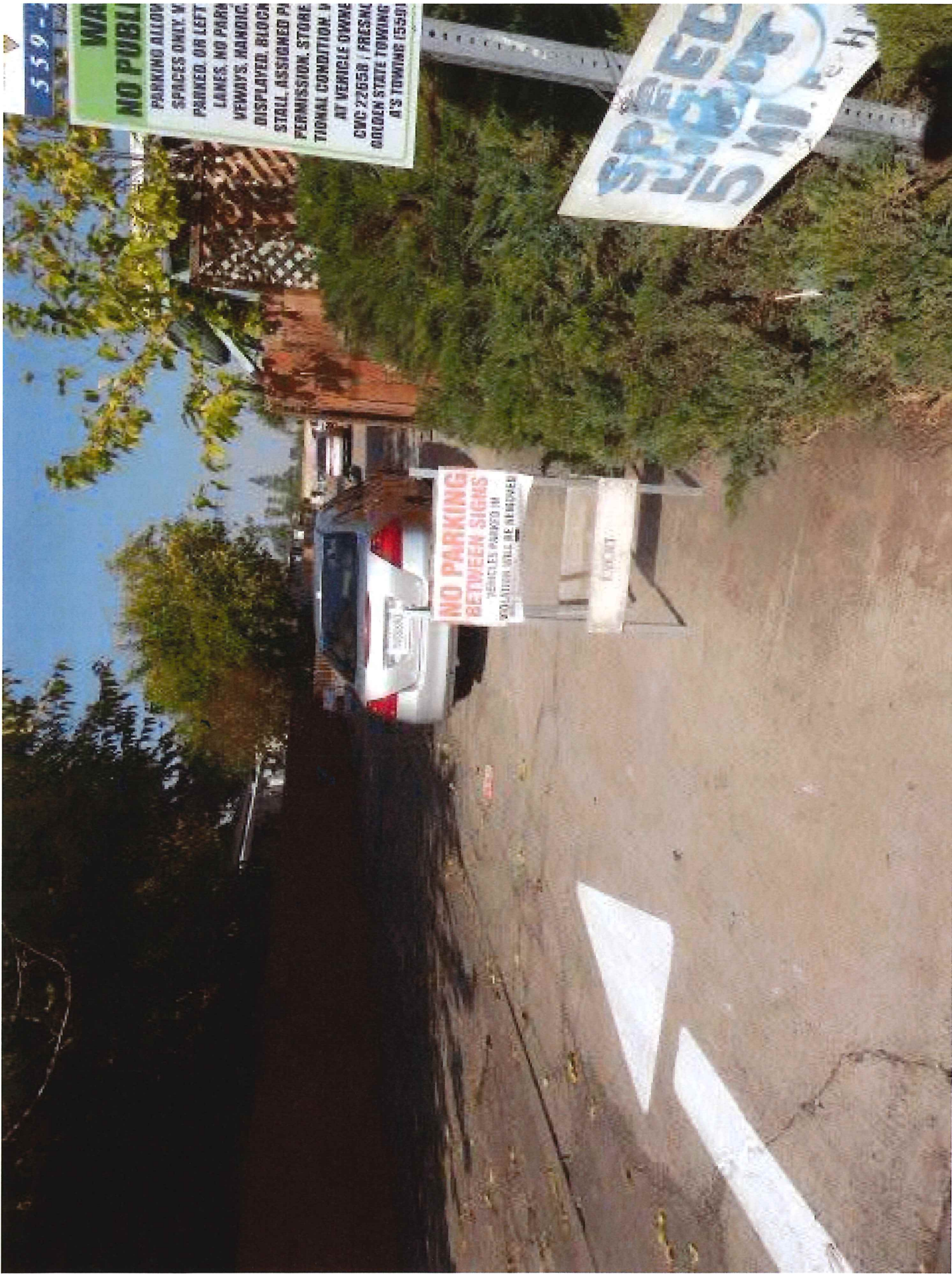
### WORK EXPERIENCE

- Private Architectural and Planning Practice (Self-employed since 1981).  
Private sector works with Commercial, Health Care, Residential, and Industrial.
- College Instructor (3-years) - "Residential Design and Construction" – Business Division, Community College.
- Design and production of Construction Drawings and Specifications for Negotiated and Bid contracts.
- Project Management (including Design / Build).
- Consulting and Inspection Reports for Property Management Companies and Due-Diligence for Property Owners.
- Forensic Investigations and Consulting for Structural Defects, Hardboard Siding Failure, Roof Issues, Water Intrusion, Asphaltic Pavement Failure, and Construction Deficiencies.
- Owner/Contractor Mediation for Construction related Issues.

XXXXX

# **EXHIBIT B**





559-

**WA**  
**NO PUBLIC**  
PARKING ALLOWED  
SPACES ONLY. VEHICLES  
PARKED ON LEFT  
LANES, NO PARKING  
VEHICLES, HANDICAP  
DISPLAYED, BLOCK  
STALL, ASSIGNED PARKING  
PERMISSION, STORAGE  
TENT, CONDITION, VEHICLES  
AT VEHICLE OWNERS  
CWC 22658 / FRESH  
GOLDEN STATE TOWING  
A'S TOWING (559)

**NO PARKING**  
**BETWEEN SIGNS**  
VEHICLES PARKED IN  
VIOLATION WILL BE REMOVED

**NO PARKING**  
**VEHICLES**  
**WILL BE REMOVED**









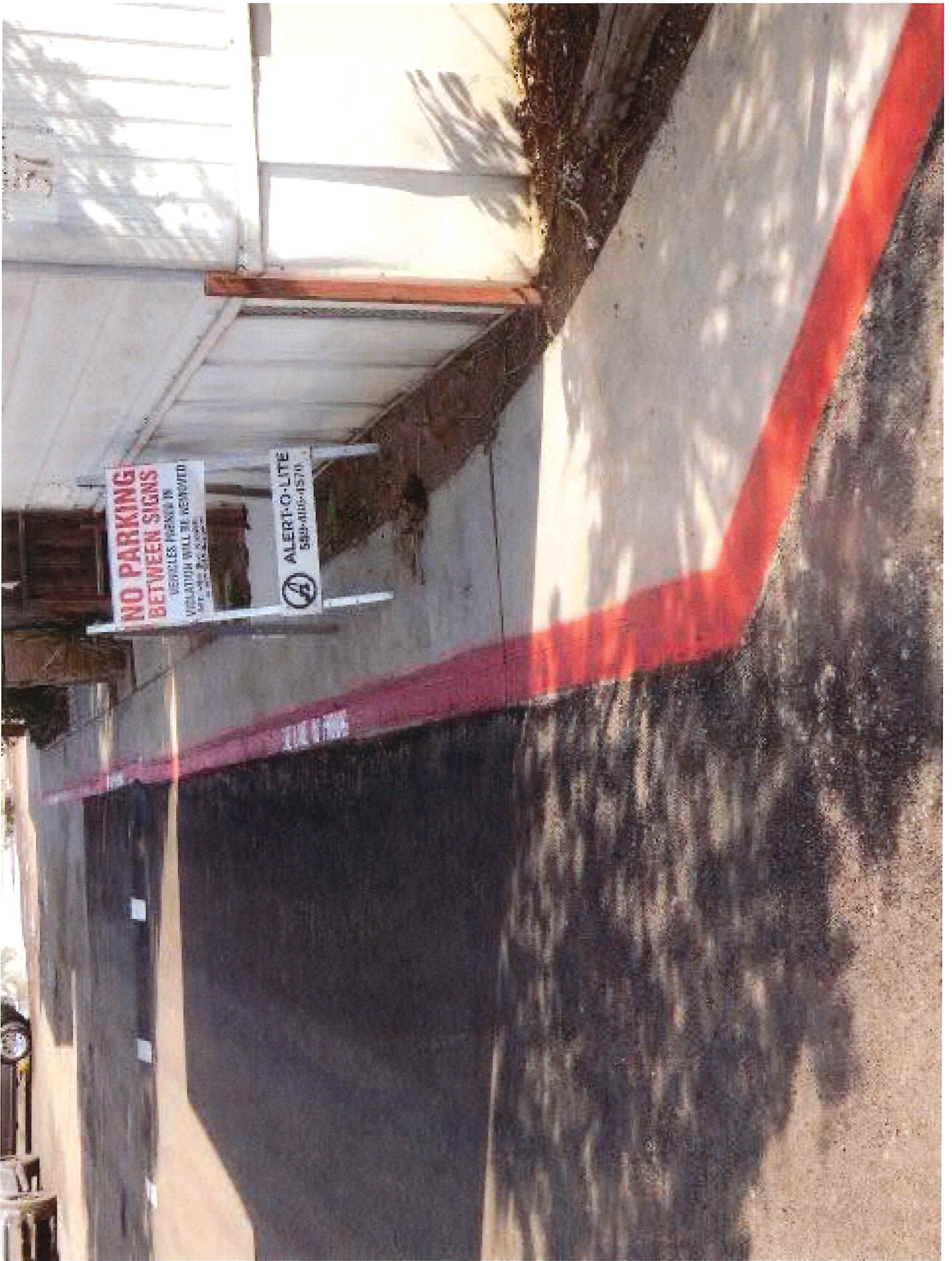




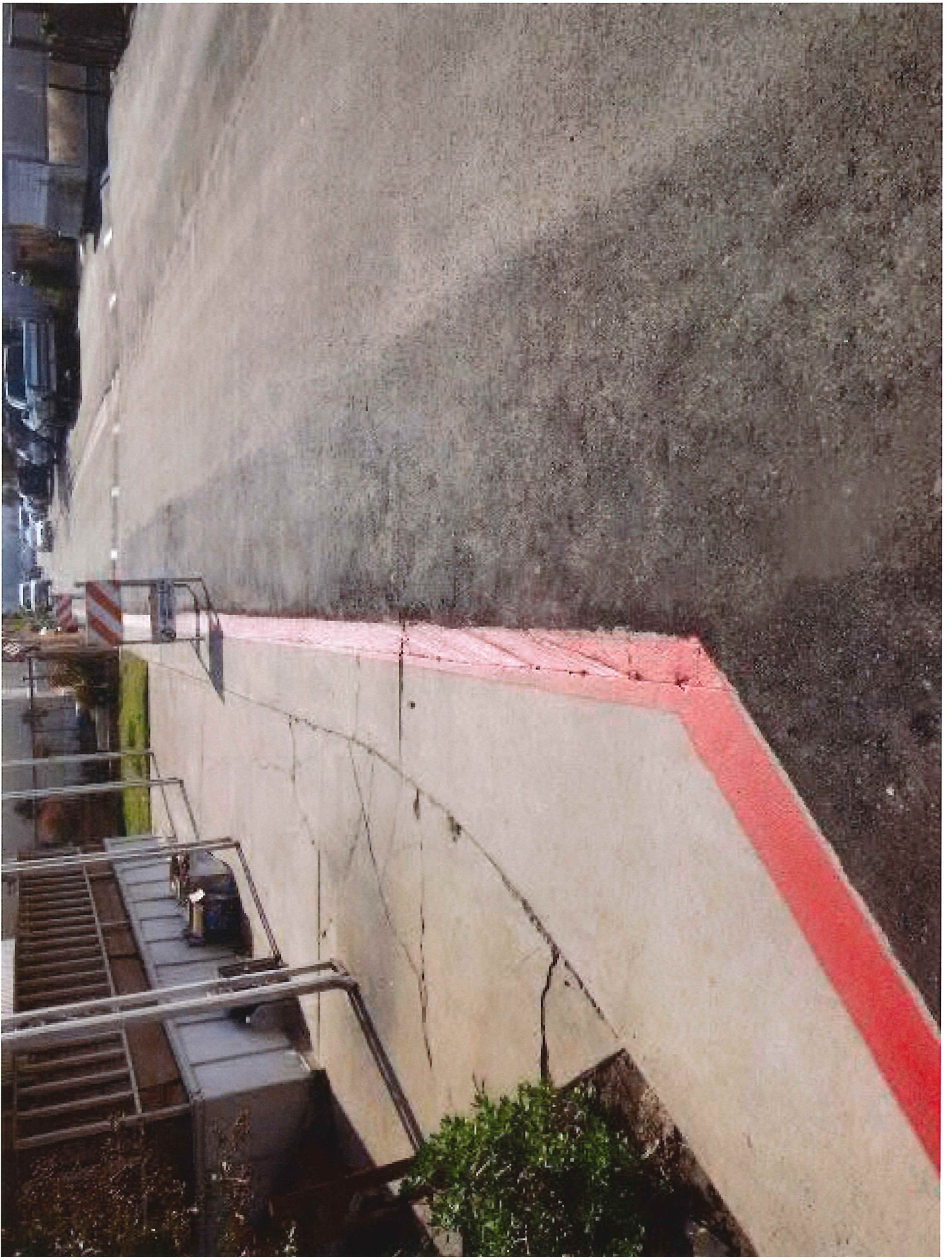
















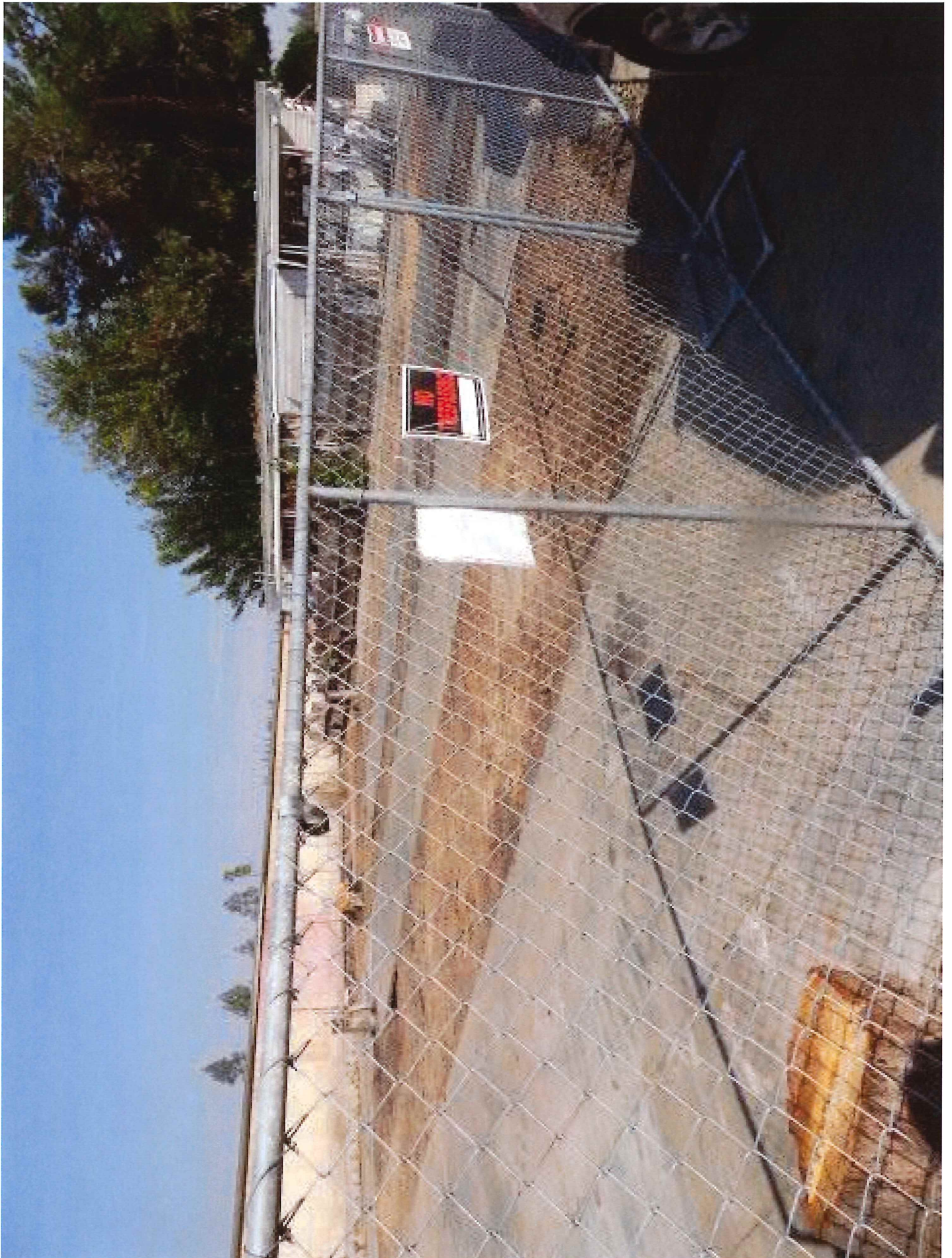
# **EXHIBIT C**





SPACES 22, 23, 24





SPACES 27, 28

# Leon Environmental Services

Richard "Danny" Leon CAC # 04-3708  
Tommy Leon CAC # 05-3882

September 23, 2021

George Santikian  
**Trails End Mobile Home Park**  
1207 W. Fremont Ave  
Fresno, CA 93711

**Re: Asbestos Survey**  
**Trails End Mobile Home Park – Space 22**  
**Burned Mobile Home**  
**104 E. Sierra Ave.**  
**Fresno, CA**  
**Job No. S103-21-01**

Dear George:

Attached is the asbestos survey report for the above referenced building. This report includes inspection observations, a list of all samples taken, bulk sample analysis results, a sample location drawing, and recommendations concerning asbestos containing materials.

If you have any questions or need additional information, please do not hesitate to call. Thank you for using Leon Environmental Services. We look forward to working with you in the future.

Respectfully,

Tommy Leon  
Certified Asbestos Consultant  
Certification No. 05-3882

4545 N. Brawley Ave., Suite 104, Fresno, CA 93722  
Phone: 559.274.9200 Fax: 559.274.9240 Email: [LeonEnviro@comcast.net](mailto:LeonEnviro@comcast.net)



**Asbestos Survey: Trails End Mobile Home Park – Space 22,**  
**104 E. Sierra Ave, Fresno, CA**  
**S103-21-01**

BUILDING DESCRIPTION
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An asbestos survey was performed on **September 21, 2021** at **104 E. Sierra Ave, Fresno, CA, Space #22, Fresno, CA**. The mobile home is approximately 40-50 years old and the debris area was approximately 800sqft. It was severely burned by a local fire. The original construction had a wood floor, metal exterior walls and a metal roof. The burned debris pile that is left at the site had few recognizable building materials. The building materials identified were flooring materials, sheetrock with associated joint compound and texture . At the time of the survey the site was accessible.

ASBESTOS ANALYSIS RESULTS
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All bulk samples of suspect asbestos containing materials were taken in accordance with US EPA Guidelines and accepted industry standards by a state certified asbestos consultant. Western Analytical Laboratory, Inc., a NVLAP accredited laboratory performed a total of **12** analyses from **12** samples collected from this structure at this site. The full list of all samples taken is on the following pages. Sample locations are indicated on the drawings included with this report. ***Quantities listed below are estimates, for sampling purposes only, and should be verified prior to asbestos abatement.***

Sample	Location	Material	% Of ACM	Friable	Sq. Ft.
01	Back Bathroom Wall	Joint Compound	ND		
02	Back Bathroom Wall	Sheetrock	ND		
03	Back Bathroom Wall	Joint Compound	ND		
04	Back Bathroom Wall	Sheetrock	ND		
05	Front Bedroom Wall	Sheetrock	ND		
06	Back Bedroom Floor	12x12 Floor Tile	ND		
07	Back Bedroom Floor	Flooring Material	ND		
08	Back Bedroom Area	Burn Debris	ND		
09	Middle Hall Area	Burn Debris	ND		
10	Front Room Area	Burn Debris	ND		

**Asbestos Survey: Trails End Mobile Home Park – Space 22,  
104 E. Sierra Ave, Fresno, CA  
S103-21-01**

11	Entry Area	Burn Debris	ND		
12	Front Bedroom Area	Burn Debris	ND		

COMMENTS AND RECOMMENDATIONS
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**All samples of suspect materials from this site were negative for asbestos.**

CONCLUSIONS AND REGULATIONS
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**US EPA NESHAP (40 CFR Part 61)**

Based on our survey, sampling and subsequent laboratory analysis and regulatory guidelines affecting this site, the types of ACM identified on the previous page require removal (in most cases) prior to demolition and/or renovation procedures to comply with local, state and federal agencies. The US EPA NESHAP (40 CFR Part 61 – November 20, 1990) requires materials containing greater than one percent asbestos be removed prior to renovation or demolition. If those materials are friable or likely to become friable due to the forces expected to act upon them during renovation or demolition, they become a regulated asbestos containing material (RACM) and require a 10-day notification to the local Air Pollution Control District prior to abatement.

Non-friable and non-regulated ACM, in most cases, may be disposed of as a Non-Hazardous waste in a landfill that accepts Asbestos Containing Materials. All friable waste containing more than 1% asbestos (RACM) must be manifested as hazardous waste for disposal purposes.

**CAL OSHA-----Construction Industry-----8CCR, 1529**

Cal/OSHA worker health and safety regulations apply during any disturbance of ACM by a person while in the employ of another. This is true regardless of friability or quantity disturbed. If there is greater than 100 square feet of ACM which will be affected by the demolition, a California Licensed Contractor who is registered with Cal/OSHA for asbestos is required. The regulations regarding asbestos are found in Title 8 CCR Section 1529, and also include formal notification requirements to Cal/OSHA at least 24 hours prior to removal. It is required that removal be conducted with the material kept in a wetted state to contain dust and hazardous emissions.

The construction industry standard covers employees engaged in demolition and construction, and the following related activities likely to involve asbestos exposure: removal, encapsulation, alteration, repair, maintenance, insulation, spill emergency cleanup, transportation, disposal and storage of ACM.

**Asbestos Survey: Trails End Mobile Home Park – Space 22,**  
**104 E. Sierra Ave, Fresno, CA**  
**S103-21-01**

Demolition contractors typically require that a building owner/operator accept responsibility for removal of all ACM found during the building inspection prior to start of demolition activities.

LIMITATIONS OF LIABILITY
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Conclusions and recommendations presented in this report are qualitative judgments based on the prevailing regulations and accepted industry standards at the time of the report issuance. Leon Environmental Services provides no other guarantees, either expressed or implied. All quantities of materials listed herein are estimates for sampling purposes only, and should be verified by Owner representative or an abatement contractor prior to asbestos abatement.

The nature of demolition and asbestos abatement is such that materials can be uncovered which previously were unknown to exist. Therefore, Leon Environmental Services cannot be responsible for materials not previously detected due to lack of accessibility or concealment, although every effort was made during the inspection to detect all suspect materials. If any materials other than those included herein are discovered during renovation or demolition, it must be assumed that the materials are asbestos containing, and should be treated accordingly until further testing and analysis is performed.

The data interpretations and recommendations are based solely on information available to Leon Environmental Services at the time of our inspection. The customer recognizes that site conditions or accessibility may vary, from those encountered at the time of our inspection and sample collection. Varying conditions or access could result in additional information that would lead us to revise conclusions and recommendations. Leon Environmental Services will not be responsible for the interpretation or use by others of information contained within this report.

**Thomas M. Leon**

Digitally signed by Thomas M. Leon  
DN: cn=Thomas M. Leon, o=Leon Environmental Services,  
ou, email=leonenviro@comcast.net, c=US  
Date: 2021.09.28 05:55:47 -07'00'

Thomas Leon  
Certified Asbestos Consultant  
Certification No. 05-3882

DATE:

**\*Abbreviation Key:**

*Asbestos Containing Material — ACM (equal to or greater than 0.1% by weight)*  
*Vinyl Asbestos Tile – VAT*  
*No Asbestos Detected--N.A.D or N.D.*  
*Homogeneous—H*  
*Not Sampled--NS*

# Leon Environmental Services

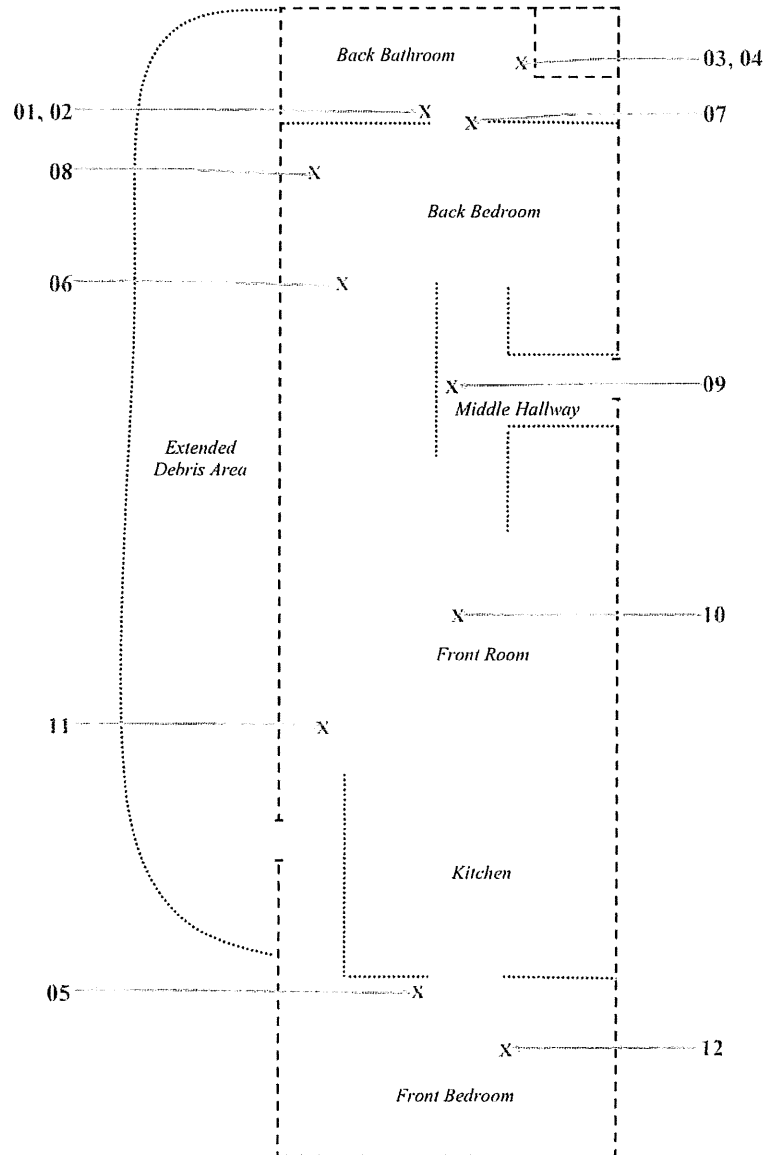
Richard "Danny" Leon CAC Certification No. 04-3708

Tommy Leon CAC Certification No. 05-3882

## Job S103-21-01 / Sample Location Diagram

Trails End Mobile Home Park - Demo Burned Mobile Home / 104 E. Sierra Avenue, Space 22, Fresno, CA

Drawing not to Scale



Y = Exterior Samples

X = Interior Samples

R = Roof Samples

4545 N. Brawley Ave., Suite 104, Fresno, CA 93722

Phone: 559.274.9200 Fax: 559.274.9240 Email: LeonEnviro@comcast.net



153-340

4545 N. Brawley Ave., Suite 104, Fresno, CA 93722 Phone: 559.274.9200 Fax: 559.274.9240 Email: [LeonEnviro@comcast.net](mailto:LeonEnviro@comcast.net)

**Company: John H. Frost, AIA Architect**

Job No. S103-21-01

**3-5 days**

**Inspection Site : Trails End Mobile Home Park: Space 22, 104 E. Sierra Avenue, Fresno, CA**

[illegible]

**Received**

Date 9-16-21

Date 9/21/21



**WESTERN ANALYTICAL LABORATORY, Inc.**  
**TEST REPORT**



REPORT NO: 153-340 CLIENT: Leon Environmental Services  
DATE COLLECTED: September 16, 2021 4545 N. Brawley Ave., Suite 104  
Fresno CA 93722  
DATE RECEIVED: September 21, 2021 ATTENTION: Danny Leon (CAC# 04-3708)  
DATE REQUIRED: September 24, 2021 REFERENCE: S103-21-01  
John Frost - John H. Frost, AIA Architect  
Trails End Mobile Home Park, Space 22  
104 E. Sierra Avenue, Fresno, CA

SUBJECT: Polarized Light Microscopy Analysis for Asbestos; 12 samples

METHODOLOGY: "Method for the Determination of Asbestos in Bulk Building Materials" (EPA 600/R-93/116)

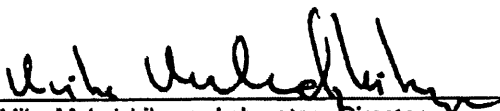
ACCREDITED: National Institute of Standards and Technology (NVLAP) # 200037

SAMPLE ID NUMBER	SAMPLE LOCATION AND DESCRIPTION	NON-FIBROUS MATERIALS	OTHER FIBROUS MATERIALS	ASBESTIFORM MINERALS
01	Back Bathroom Wall Joint compound	Granular Minerals Organics	None Detected	None Detected
02	Back Bathroom Wall Sheetrock	Granular Minerals Gypsum	Cellulose 10%	None Detected
03	Back Bathroom Wall Joint compound	Granular Minerals Organics	None Detected	None Detected
04	Back Bathroom Wall Sheetrock	Granular Minerals Gypsum	Cellulose 10%	None Detected
05	Front Bedroom Wall Sheetrock	Granular Minerals Gypsum	Cellulose 10%	None Detected

t: Trace (>1% = greater than 1%, <1% = less than 1%)

Note: Sample #8 to 12 were gravimetrically reduced by ashing before PLM analysis

  
Optical Microscopist

  
Mike Maladzhikyan, Laboratory Director

This report only applies to the sample(s) tested. This report must not be reproduced except in full, unless approved by Western Analytical. The client is solely responsible for the use and interpretation of test results and reports requested from Western Analytical. This report must not be used by the client to claim product endorsement by NVLAP or any other agency of the U.S. Government.

WESTERN ANALYTICAL LABORATORY, Inc.  
12734 Branford St. Suite #19, Arleta, CA 91331 • Tel: (818) 899-0949 • Email: WesternAnalytical@gmail.com

REPORT # 153-340 continued:

REFERENCE: S103-21-01 / John Frost - John H. Frost, AIA Architect / Trails End Mobile Home Park, Space 22 104 E.  
Sierra Avenue, Fresno, CA

SAMPLE ID NUMBER	SAMPLE LOCATION AND DESCRIPTION	NON-FIBROUS MATERIALS	OTHER FIBROUS MATERIALS	ASBESTIFORM MINERALS
06	Back Bedroom Floor  12x12 Floor tile	Granular Minerals Resin Organics	None Detected	None Detected
07	Back Bathroom Floor  Flooring material	Granular Minerals Organics	None Detected	None Detected
08	Back Bedroom Area  Burn debris	Granular Minerals Opaques	Fiberglass	None Detected
09	Middle Hall Area  Burn debris	Granular Minerals Opaques	Fiberglass	None Detected
10	Front Room Area  Burn debris	Granular Minerals Opaques	Glass Wool	None Detected
11	Entry Area  Burn debris	Granular Minerals Opaques	Fiberglass	None Detected
12	Front Bedroom Area  Burn debris	Granular Minerals Opaques	Glass Wool	None Detected

t: Trace >1% = greater than 1% <1 = less than 1%

  
Optical Microscopist

  
Mike Maladzhikyan, Laboratory Director

This report only applies to the sample(s) tested. This report must not be reproduced except in full, unless approved by Western Analytical. The client is solely responsible for the use and interpretation of test results and reports requested from Western Analytical. This report must not be used by the client to claim product endorsement by NVLAP or any other agency of the U.S. Government.

WESTERN ANALYTICAL LABORATORY, Inc.  
12734 Branford St. Suite #19, Arleta, CA 91331 • Tel: (818) 899-0949 • Email: WesternAnalytical@gmail.com

# Leon Environmental Services

Richard "Danny" Leon CAC # 04-3708

Tommy Leon CAC # 05-3882

September 23, 2021

George Santikian  
**Trails End Mobile Home Park**  
1207 W. Fremont Ave  
Fresno, CA 93711

**Re: Asbestos Survey**  
**Trails End Mobile Home Park – Space 23**  
**Burned Mobile Home**  
**104 E. Sierra Ave.**  
**Fresno, CA**  
**Job No. S103-21-02**

Dear George:

Attached is the asbestos survey report for the above referenced building. This report includes inspection observations, a list of all samples taken, bulk sample analysis results, a sample location drawing, and recommendations concerning asbestos containing materials.

If you have any questions or need additional information, please do not hesitate to call. Thank you for using Leon Environmental Services. We look forward to working with you in the future.

Respectfully,

Tommy Leon  
Certified Asbestos Consultant  
Certification No. 05-3882

4545 N. Brawley Ave., Suite 104, Fresno, CA 93722  
Phone: 559.274.9200 Fax: 559.274.9240 Email: [LeonEnviro@comcast.net](mailto:LeonEnviro@comcast.net)



**Asbestos Survey: Trails End Mobile Home Park – Space 23,  
104 E. Sierra Ave, Fresno, CA  
S103-21-02**

**BUILDING DESCRIPTION**

An asbestos survey was performed on **September 21, 2021** at **104 E. Sierra Ave, Fresno, CA, Space #23, Fresno, CA**. The mobile home is approximately 40-50 years old and the debris area was approximately 800sqft. It was severely burned by a local fire. The original construction had a wood floor, metal exterior walls and a metal roof. The burned debris pile that is left at the site had few recognizable building materials. The building materials identified were flooring and roofing materials. At the time of the survey the site was accessible.

**ASBESTOS ANALYSIS RESULTS**

All bulk samples of suspect asbestos containing materials were taken in accordance with US EPA Guidelines and accepted industry standards by a state certified asbestos consultant. Western Analytical Laboratory, Inc., a NVLAP accredited laboratory performed a total of **05** analyses from **05** samples collected from this structure at this site. The full list of all samples taken is on the following pages. Sample locations are indicated on the drawings included with this report. ***Quantities listed below are estimates, for sampling purposes only, and should be verified prior to asbestos abatement.***

Sample	Location	Material	% Of ACM	Friable	Sq. Ft.
01	Southwest Area Floor	Flooring	ND		
02	North Area	Burn Debris	ND		
03	East Middle Area	Burn Debris	ND		
04	Middle Area	Burn Debris	ND		
05	Roof	Roofing Debris	ND		

**COMMENTS AND RECOMMENDATIONS**

**All samples of suspect materials from this site were negative for asbestos.**

**CONCLUSIONS AND REGULATIONS**

**US EPA NESHAP (40 CFR Part 61)**

**Asbestos Survey: Trails End Mobile Home Park – Space 23,  
104 E. Sierra Ave, Fresno, CA  
S103-21-02**

Based on our survey, sampling and subsequent laboratory analysis and regulatory guidelines affecting this site, the types of ACM identified on the previous page require removal (in most cases) prior to demolition and/or renovation procedures to comply with local, state and federal agencies. The US EPA NESHAP (40 CFR Part 61 – November 20, 1990) requires materials containing greater than one percent asbestos be removed prior to renovation or demolition. If those materials are friable or likely to become friable due to the forces expected to act upon them during renovation or demolition, they become a regulated asbestos containing material (RACM) and require a 10-day notification to the local Air Pollution Control District prior to abatement.

Non-friable and non-regulated ACM, in most cases, may be disposed of as a Non-Hazardous waste in a landfill that accepts Asbestos Containing Materials. All friable waste containing more than 1% asbestos (RACM) must be manifested as hazardous waste for disposal purposes.

**CAL OSHA-----Construction Industry-----8CCR, 1529**

Cal/OSHA worker health and safety regulations apply during any disturbance of ACM by a person while in the employ of another. This is true regardless of friability or quantity disturbed. If there is greater than 100 square feet of ACM which will be affected by the demolition, a California Licensed Contractor who is registered with Cal/OSHA for asbestos is required. The regulations regarding asbestos are found in Title 8 CCR Section 1529, and also include formal notification requirements to Cal/OSHA at least 24 hours prior to removal. It is required that removal be conducted with the material kept in a wetted state to contain dust and hazardous emissions.

The construction industry standard covers employees engaged in demolition and construction, and the following related activities likely to involve asbestos exposure: removal, encapsulation, alteration, repair, maintenance, insulation, spill emergency cleanup, transportation, disposal and storage of ACM.

Demolition contractors typically require that a building owner/operator accept responsibility for removal of all ACM found during the building inspection prior to start of demolition activities.

<b>LIMITATIONS OF LIABILITY</b>
---------------------------------

Conclusions and recommendations presented in this report are qualitative judgments based on the prevailing regulations and accepted industry standards at the time of the report issuance. Leon Environmental Services provides no other guarantees, either expressed or implied. All quantities of materials listed herein are estimates for sampling purposes only, and should be verified by Owner representative or an abatement contractor prior to asbestos abatement.

**Asbestos Survey: Trails End Mobile Home Park – Space 23,**  
**104 E. Sierra Ave, Fresno, CA**  
**S103-21-02**

The nature of demolition and asbestos abatement is such that materials can be uncovered which previously were unknown to exist. Therefore, Leon Environmental Services cannot be responsible for materials not previously detected due to lack of accessibility or concealment, although every effort was made during the inspection to detect all suspect materials. If any materials other than those included herein are discovered during renovation or demolition, it must be assumed that the materials are asbestos containing, and should be treated accordingly until further testing and analysis is performed.

The data interpretations and recommendations are based solely on information available to Leon Environmental Services at the time of our inspection. The customer recognizes that site conditions or accessibility may vary, from those encountered at the time of our inspection and sample collection. Varying conditions or access could result in additional information that would lead us to revise conclusions and recommendations. Leon Environmental Services will not be responsible for the interpretation or use by others of information contained within this report.

**Thomas M. Leon**

Digitally signed by Thomas M. Leon  
DN: cn=Thomas M. Leon, o=Leon Environmental  
Services, ou, email=leonenviro@comcast.net, c=US  
Date: 2021.09.28 05:59:04 -07'00'

Thomas Leon  
Certified Asbestos Consultant  
Certification No. 05-3882

DATE:

**\*Abbreviation Key:**

*Asbestos Containing Material — ACM (equal to or greater than 0.1% by weight)*  
*Vinyl Asbestos Tile — VAT*  
*No Asbestos Detected--N.A.D or N.D.*  
*Homogeneous—H*  
*Not Sampled--NS*

# Leon Environmental Services

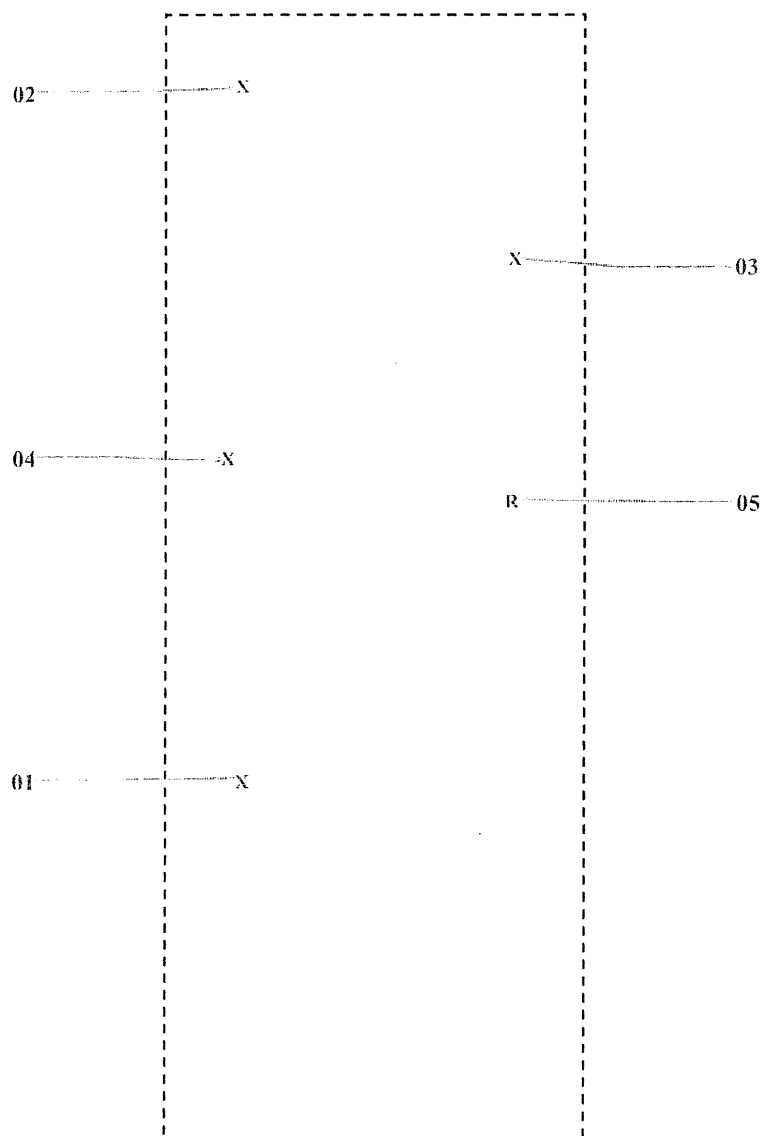
Richard "Danny" Leon CAC Certification No. 04-3708

Tommy Leon CAC Certification No. 05-3882

## Job S103-21-02 / Sample Location Diagram

Trails End Mobile Home Park – Demo Burned Mobile Home / Space 23, 104 E. Sierra Avenue, Fresno, CA

Drawing not to Scale



Y = Exterior Samples

X = Interior Samples

R = Roof Samples

4545 N. Brawley Ave., Suite 104, Fresno, CA 93722  
Phone: 559.274.9200 Fax: 559.274.9240 Email: LeonEnviro@comcast.net



153-34

4545 N. Brawley Ave., Suite 104, Fresno, CA 93722 Phone: 559.274.9200 Fax: 559.274.9240 Email: [LeonEnviro@comcast.net](mailto:LeonEnviro@comcast.net)

**Company: John H. Frost, AIA Architect**

**Job No. S103-21-02**

**Turn Around:**

48hr

**3-5 days**

[illegible]

**Received**

Date 9-16-21

Paula

Date:

92121



**WESTERN ANALYTICAL LABORATORY, Inc.**  
**TEST REPORT**



REPORT NO: 153-341 CLIENT: Leon Environmental Services  
DATE COLLECTED: September 16, 2021 4545 N. Brawley Ave., Suite 104  
Fresno CA 93722  
DATE RECEIVED: September 21, 2021 ATTENTION: Danny Leon (CAC# 04-3708)  
DATE REQUIRED: September 24, 2021 REFERENCE: S103-21-02  
John Frost - John H. Frost, AIA Architect  
Trails End Mobile Home Park, Space 23  
104 E. Sierra Avenue, Fresno, CA

SUBJECT: Polarized Light Microscopy Analysis for Asbestos; 5 samples

METHODOLOGY: "Method for the Determination of Asbestos in Bulk Building Materials" (EPA 600/R-93/116)

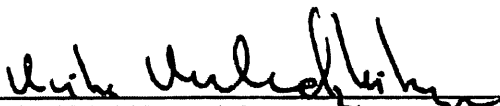
ACCREDITED: National Institute of Standards and Technology (NVLAP) # 200037

SAMPLE ID NUMBER	SAMPLE LOCATION AND DESCRIPTION	NON-FIBROUS MATERIALS	OTHER FIBROUS MATERIALS	ASBESTIFORM MINERALS
01	South West Area Floor Flooring	Granular Minerals Resin Organics	None Detected	None Detected
02	North Area Burn debris	Granular Minerals Opaques	Fiberglass	None Detected
03	East Middle Area Burn debris	Granular Minerals Opaques	Fiberglass	None Detected
04	Middle Area Burn debris	Granular Minerals Opaques	Fiberglass	None Detected
05	Roof Roofing debris	Granular Minerals Opaques	Fiberglass	None Detected

t: Trace (>1% = greater than 1%, <1% = less than 1%)

Note: Sample #2, 3, 4, 5 were gravimetrically reduced by ashing before PLM analysis

  
Optical Microscopist

  
Mike Maladzhikyan, Laboratory Director

This report only applies to the sample(s) tested. This report must not be reproduced except in full, unless approved by Western Analytical. The client is solely responsible for the use and interpretation of test results and reports requested from Western Analytical. This report must not be used by the client to claim product endorsement by NVLAP or any other agency of the U.S. Government.

WESTERN ANALYTICAL LABORATORY, Inc.  
12734 Branford St. Suite #19, Arleta, CA 91331 • Tel: (818) 899-0949 • Email: WesternAnalytical@gmail.com

# *Leon Environmental Services*

Richard "Danny" Leon CAC # 04-3708  
Tommy Leon CAC # 05-3882

September 23, 2021

George Santikian  
**Trails End Mobile Home Park**  
1207 W. Fremont Ave  
Fresno, CA 93711

**Re: Asbestos Survey**  
**Trails End Mobile Home Park – Space 24**  
**Burned Mobile Home**  
**104 E. Sierra Ave.**  
**Fresno, CA**  
**Job No. S103-21-03**

Dear George:

Attached is the asbestos survey report for the above referenced building. This report includes inspection observations, a list of all samples taken, bulk sample analysis results, a sample location drawing, and recommendations concerning asbestos containing materials.

If you have any questions or need additional information, please do not hesitate to call. Thank you for using Leon Environmental Services. We look forward to working with you in the future.

Respectfully,

Tommy Leon  
Certified Asbestos Consultant  
Certification No. 05-3882

4545 N. Brawley Ave., Suite 104, Fresno, CA 93722  
Phone: 559.274.9200 Fax: 559.274.9240 Email: [LeonEnviro@comcast.net](mailto:LeonEnviro@comcast.net)

**Asbestos Survey: Trails End Mobile Home Park – Space 24,  
104 E. Sierra Ave, Fresno, CA  
S103-21-03**

**BUILDING DESCRIPTION**

An asbestos survey was performed on **September 21, 2021** at **104 E. Sierra Ave, Fresno, CA, Space #24, Fresno, CA**. The mobile home is approximately 40-50 years old and the debris area was approximately 800sqft. It was severely burned by a local fire. The original construction had a wood floor, metal exterior walls and a metal roof. The burned debris pile that is left at the site had few recognizable building materials. The building materials identified were flooring materials, sheetrock with associated joint compound and texture, and roofing Materials. At the time of the survey the site was accessible.

**ASBESTOS ANALYSIS RESULTS**

All bulk samples of suspect asbestos containing materials were taken in accordance with US EPA Guidelines and accepted industry standards by a state certified asbestos consultant. Western Analytical Laboratory, Inc., a NVLAP accredited laboratory performed a total of **18** analyses from **18** samples collected from this structure at this site. The full list of all samples taken is on the following pages. Sample locations are indicated on the drawings included with this report. ***Quantities listed below are estimates, for sampling purposes only, and should be verified prior to asbestos abatement.***

Sample	Location	Material	% Of ACM	Friable	Sq. Ft.
01	Kitchen Wall	Texture / Paint	ND		
02	Kitchen Wall	Joint Compound	ND		
03	Kitchen Wall	Sheetrock	ND		
04	Kitchen Wall	Texture / Paint	ND		
05	Kitchen Wall	Joint Compound	ND		
06	Kitchen Wall	Sheetrock	ND		
07	Front Room Wall	Texture / Paint	ND		
08	Front Room Wall	Joint Compound	ND		
09	Front Room Wall	Sheetrock	ND		
10	Kitchen Floor	Floor Tile	ND		



**Asbestos Survey: Trails End Mobile Home Park – Space 24,  
104 E. Sierra Ave, Fresno, CA  
S103-21-03**

11	Northeast Area	Flooring Material	ND		
12	East Middle Area	Burn Debris	ND		
13	Northeast Area	Burn Debris	ND		
14	South Area	Burn Debris	ND		
15	Roof	Rolled Roofing Material	ND		
16	Roof	Asphalt Shingle	ND		
17	Roof	Asphalt Shingle	ND		
18	Roof	Asphalt Shingle	ND		

COMMENTS AND RECOMMENDATIONS
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**All samples of suspect materials from this site were negative for asbestos.**

CONCLUSIONS AND REGULATIONS
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**US EPA NESHAP (40 CFR Part 61)**

Based on our survey, sampling and subsequent laboratory analysis and regulatory guidelines affecting this site, the types of ACM identified on the previous page require removal (in most cases) prior to demolition and/or renovation procedures to comply with local, state and federal agencies. The US EPA NESHAP (40 CFR Part 61 – November 20, 1990) requires materials containing greater than one percent asbestos be removed prior to renovation or demolition. If those materials are friable or likely to become friable due to the forces expected to act upon them during renovation or demolition, they become a regulated asbestos containing material (RACM) and require a 10-day notification to the local Air Pollution Control District prior to abatement.

Non-friable and non-regulated ACM, in most cases, may be disposed of as a Non-Hazardous waste in a landfill that accepts Asbestos Containing Materials. All friable waste containing more than 1% asbestos (RACM) must be manifested as hazardous waste for disposal purposes.

**Asbestos Survey: Trails End Mobile Home Park – Space 24,  
104 E. Sierra Ave, Fresno, CA  
S103-21-03**

**CAL OSHA-----Construction Industry-----8CCR, 1529**

Cal/OSHA worker health and safety regulations apply during any disturbance of ACM by a person while in the employ of another. This is true regardless of friability or quantity disturbed. If there is greater than 100 square feet of ACM which will be affected by the demolition, a California Licensed Contractor who is registered with Cal/OSHA for asbestos is required. The regulations regarding asbestos are found in Title 8 CCR Section 1529, and also include formal notification requirements to Cal/OSHA at least 24 hours prior to removal. It is required that removal be conducted with the material kept in a wetted state to contain dust and hazardous emissions.

The construction industry standard covers employees engaged in demolition and construction, and the following related activities likely to involve asbestos exposure: removal, encapsulation, alteration, repair, maintenance, insulation, spill emergency cleanup, transportation, disposal and storage of ACM.

Demolition contractors typically require that a building owner/operator accept responsibility for removal of all ACM found during the building inspection prior to start of demolition activities.

<b>LIMITATIONS OF LIABILITY</b>
---------------------------------

Conclusions and recommendations presented in this report are qualitative judgments based on the prevailing regulations and accepted industry standards at the time of the report issuance. Leon Environmental Services provides no other guarantees, either expressed or implied. All quantities of materials listed herein are estimates for sampling purposes only, and should be verified by Owner representative or an abatement contractor prior to asbestos abatement.

The nature of demolition and asbestos abatement is such that materials can be uncovered which previously were unknown to exist. Therefore, Leon Environmental Services cannot be responsible for materials not previously detected due to lack of accessibility or concealment, although every effort was made during the inspection to detect all suspect materials. If any materials other than those included herein are discovered during renovation or demolition, it must be assumed that the materials are asbestos containing, and should be treated accordingly until further testing and analysis is performed.

The data interpretations and recommendations are based solely on information available to Leon Environmental Services at the time of our inspection. The customer recognizes that site conditions or accessibility may vary, from those encountered at the time of our inspection and sample collection. Varying conditions or access could result in additional information that would lead us to revise conclusions and recommendations. Leon

**Asbestos Survey: Trails End Mobile Home Park – Space 24,  
104 E. Sierra Ave, Fresno, CA  
S103-21-03**

Environmental Services will not be responsible for the interpretation or use by others of information contained within this report.

**Thomas M. Leon**

Digitally signed by Thomas M. Leon  
DN: cn=Thomas M. Leon, o=Leon Environmental  
Services, ou, email=leonenviro@comcast.net, c=US  
Date: 2021.09.28 06:02:23 -07'00'

---

Thomas Leon  
Certified Asbestos Consultant  
Certification No. 05-3882

DATE:

**\*Abbreviation Key:**

*Asbestos Containing Material — ACM (equal to or greater than 0.1% by weight)*  
*Vinyl Asbestos Tile – VAT*  
*No Asbestos Detected--N.A.D or N.D.*  
*Homogeneous—H*  
*Not Sampled--NS*

# Leon Environmental Services

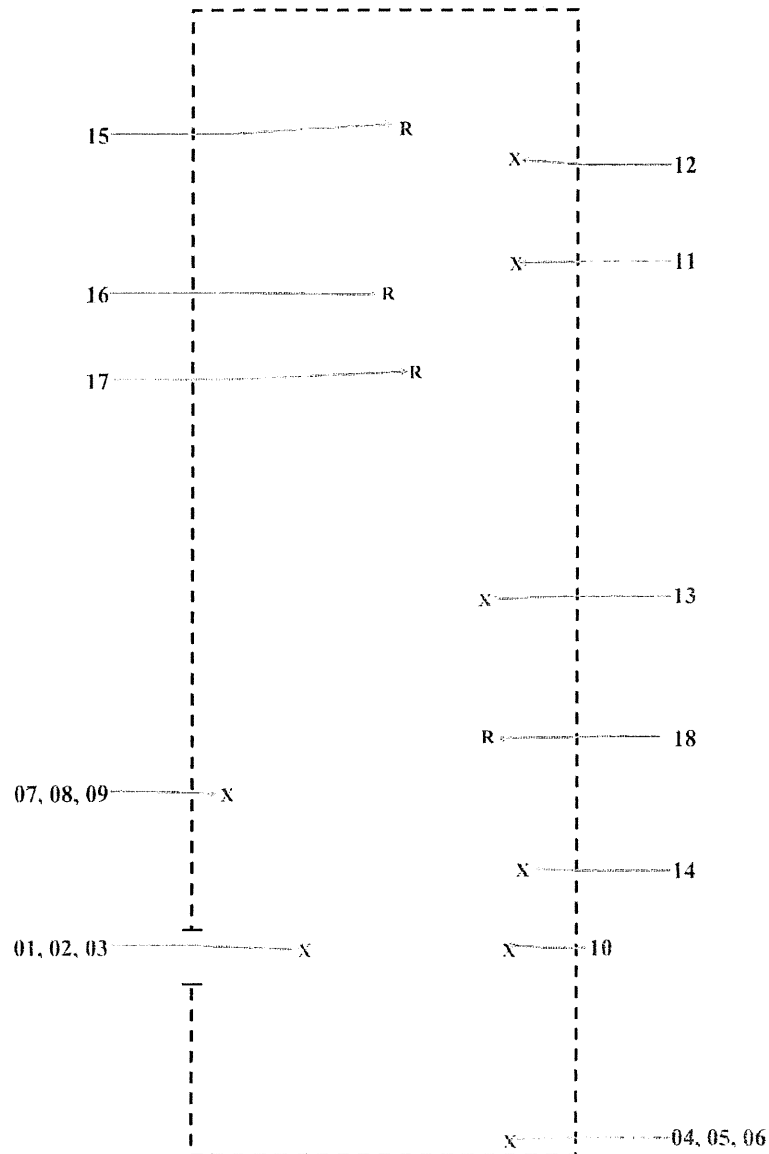
Richard "Danny" Leon CAC Certification No. 04-3708

Tommy Leon CAC Certification No. 05-3882

## Job S103-21-03 / Sample Location Diagram

Trails End Mobile Home Park – Demo Burned Mobile Home / Space 24, 104 E. Sierra Avenue, Fresno, CA

Drawing not to Scale



Y = Exterior Samples

X = Interior Samples

R = Roof Samples

4545 N. Brawley Ave., Suite 104, Fresno, CA 93722  
Phone: 559.274.9200 Fax: 559.274.9240 Email: LeonEnviro@comcast.net



# Leon Environmental Services

153-342

4545 N. Brawley Ave., Suite 104, Fresno, CA 93722 Phone: 559.274.9200 Fax: 559.274.9240 Email: LeonEnviro@comcast.net

Customer: John Frost

Company: John H. Frost, AIA Architect

Date: September 16, 2021

Job No. S103-21-03

PLM

3-5 days

48hr

24hr

Same Day

2hr Rush

Turn Around:

Inspection Site : Tralls End Mobile Home Park: Space 24, 104 E. Sierra Avenue, Fresno, CA

Sample No	Location	Material		Quantity
		Color	Finish	
01	Kitchen Wall		Texture / Paint	
02	Kitchen Wall		Joint Compound	
03	Kitchen Wall		Sheetrock	
04	Kitchen Wall		Texture / Paint	
05	Kitchen Wall		Joint Compound	
06	Kitchen Wall		Sheetrock	
07	Front Room Wall		Texture / Paint	
08	Front Room Wall		Joint Compound	
09	Front Room Wall		Sheetrock	
10	Kitchen Floor		Floor Tile	
11	Northeast Area		Flooring Material	
12	East Middle Area		Burn Debris	
13	Northeast Area		Burn Debris	
14	South Area		Burn Debris	
15	Roof		Rollled Roofing Material	
16	Roof	Brown	Asphalt Shingle	
17	Roof	Gray	Asphalt Shingle	
18	Roof	Dark Brown	Asphalt Shingle	

Relinquished By *Johnny Sun*

Date 9-16-21

Received By

*Uel*

Date

9/21/21



WESTERN ANALYTICAL LABORATORY, Inc.  
TEST REPORT



REPORT NO: 153-342 CLIENT: Leon Environmental Services  
DATE COLLECTED: September 16, 2021 4545 N. Brawley Ave., Suite 104  
DATE RECEIVED: September 21, 2021 ATTENTION: Danny Leon (CAC# 04-3708)  
DATE REQUIRED: September 24, 2021 REFERENCE: S103-21-03  
John Frost - John H. Frost, AIA Architect  
Trails End Mobile Home Park, Space 24  
104 E. Sierra Avenue, Fresno, CA

SUBJECT: Polarized Light Microscopy Analysis for Asbestos; 18 samples

METHODOLOGY: "Method for the Determination of Asbestos in Bulk Building Materials" (EPA 600/R-93/116)

ACCREDITED: National Institute of Standards and Technology (NVLAP) # 200037

SAMPLE ID NUMBER	SAMPLE LOCATION AND DESCRIPTION	NON-FIBROUS MATERIALS	OTHER FIBROUS MATERIALS	ASBESTIFORM MINERALS
01	Kitchen Wall	Granular Minerals Organics	None Detected	None Detected
	Texture/ paint			
02	Kitchen Wall	Granular Minerals Organics	None Detected	None Detected
	Joint compound			
03	Kitchen Wall	Granular Minerals Gypsum	Cellulose 10%	None Detected
	Sheetrock			
04	Kitchen Wall	Granular Minerals Organics	None Detected	None Detected
	Texture/ paint			
05	Kitchen Wall	Granular Minerals Organics	None Detected	None Detected
	Joint compound			

t: Trace (>1% = greater than 1%, <1% = less than 1%)

Note: Sample #12, 13, 14 were gravimetrically reduced by ashing before PLM analysis

  
Optical Microscopist

  
Mike Maladzhikyan, Laboratory Director

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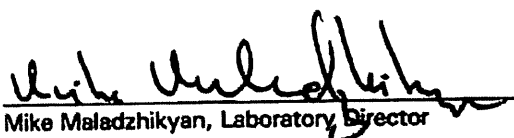
REPORT # 153-342 continued:

REFERENCE: S103-21-03 / John Frost - John H. Frost, AIA Architect / Trails End Mobile Home Park, Space 24  
104 E. Sierra Avenue, Fresno, CA

SAMPLE ID NUMBER	SAMPLE LOCATION AND DESCRIPTION	NON-FIBROUS MATERIALS	OTHER FIBROUS MATERIALS	ASBESTIFORM MINERALS
06	Kitchen Wall  Sheetrock	Granular Minerals Gypsum	Cellulose 10%	None Detected
07	Front Room Wall  Texture/ paint	Granular Minerals Organics	None Detected	None Detected
08	Front Room Wall  Joint compound	Granular Minerals Organics	None Detected	None Detected
09	Front Room Wall  Sheetrock	Granular Minerals Gypsum	Cellulose 10%	None Detected
10	Kitchen Floor  Floor tile	Granular Minerals Resin	None Detected	None Detected
11	North East Area  Flooring material	Granular Minerals Resin Opaques	None Detected	None Detected
12	East Middle Area  Burn debris	Granular Minerals Opaques	Fiberglass	None Detected
13	North East Area  Burn debris	Granular Minerals Opaques	Fiberglass	None Detected
14	South Area  Burn debris	Granular Minerals Opaques	Fiberglass	None Detected
15	Roof  Rolled roofing material	Granular Minerals Organics (tar)	Fiberglass 4-5%	None Detected

t Trace >1% = greater than 1% <1 = less than 1%

  
Optical Microscopist

  
Mike Maladzhikyan, Laboratory Director

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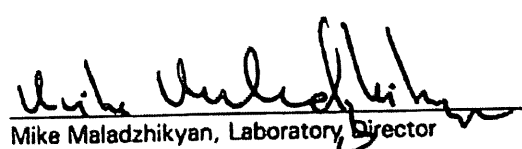
REPORT # 153-342 continued:

REFERENCE: S103-21-03 / John Frost - John H. Frost, AIA Architect / Trails End Mobile Home Park, Space 24  
104 E. Sierra Avenue, Fresno, CA

SAMPLE ID NUMBER	SAMPLE LOCATION AND DESCRIPTION	NON-FIBROUS MATERIALS	OTHER FIBROUS MATERIALS	ASBESTIFORM MINERALS
16	Roof  Asphalt shingle	Granular Minerals Organics (tar)	Fiberglass 4-5%	None Detected
17	Roof  Asphalt shingle	Granular Minerals Organics (tar)	Fiberglass 4-5%	None Detected
18	Roof  Asphalt shingle	Granular Minerals Organics (tar)	Fiberglass 4-5%	None Detected

t: Trace >1% = greater than 1% <1 = less than 1%

  
Optical Microscopist

  
Mike Maladzhikyan, Laboratory Director

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# *Leon Environmental Services*

---

Richard "Danny" Leon CAC # 04-3708  
Tommy Leon CAC # 05-3882

October 23, 2021

George Santikian  
**Trails End Mobile Home Park**  
1207 W. Fremont Ave  
Fresno, CA 93711

**Re: Asbestos Survey**  
**Trails End Mobile Home Park – Space 27**  
**Burned Mobile Home**  
**104 E. Sierra Ave.**  
**Fresno, CA**  
**Job No. S123-21-01**

Dear George:

Attached is the asbestos survey report for the above referenced building. This report includes inspection observations, a list of all samples taken, bulk sample analysis results, a sample location drawing, and recommendations concerning asbestos containing materials.

If you have any questions or need additional information, please do not hesitate to call. Thank you for using Leon Environmental Services. We look forward to working with you in the future.

Respectfully,

Tommy Leon  
Certified Asbestos Consultant  
Certification No. 05-3882

**Asbestos Survey: Trails End Mobile Home Park – Space 27,**  
**104 E. Sierra Ave, Fresno, CA**  
**S123-21-01**

BUILDING DESCRIPTION

An asbestos survey was performed on **October 13, 2021** at **104 E. Sierra Ave, Fresno, CA, Space #27, Fresno, CA**. The mobile home is approximately 40-50 years old and the debris area was approximately 800sqft. It was severely burned by a local fire. The original construction had a wood floor, metal exterior walls and a metal roof. The burned debris pile that is left at the site had few recognizable building materials. The building materials identified were flooring materials and roofing materials. At the time of the survey the site was accessible.

ASBESTOS ANALYSIS RESULTS

All bulk samples of suspect asbestos containing materials were taken in accordance with US EPA Guidelines and accepted industry standards by a state certified asbestos consultant. Western Analytical Laboratory, Inc., a NVLAP accredited laboratory performed a total of **10** analyses from **07** samples collected from this structure at this site. The full list of all samples taken is on the following pages. Sample locations are indicated on the drawings included with this report. ***Quantities listed below are estimates, for sampling purposes only, and should be verified prior to asbestos abatement.***

Sample	Location	Material	% Of ACM	Friable	Sq. Ft.
01	Northeast Area – Floor	Linoleum	ND		
02	Middle Area – Floor	Floor Tile	ND		
03	Roof	Roof Sealant/ Vapor Barrier	ND		
04	Roof	Roof Mastic	ND		
05	Northeast Area	Burn Debris	ND		
06	Middle Area	Burn Debris	ND		
07	South Area	Burn Debris	ND		

COMMENTS AND RECOMMENDATIONS

**All samples of suspect materials from this site were negative for asbestos.**

**Asbestos Survey: Trails End Mobile Home Park – Space 27,  
104 E. Sierra Ave, Fresno, CA  
S123-21-01**

CONCLUSIONS AND REGULATIONS
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**US EPA NESHAP (40 CFR Part 61)**

Based on our survey, sampling and subsequent laboratory analysis and regulatory guidelines affecting this site, the types of ACM identified on the previous page require removal (in most cases) prior to demolition and/or renovation procedures to comply with local, state and federal agencies. The US EPA NESHAP (40 CFR Part 61 – November 20, 1990) requires materials containing greater than one percent asbestos be removed prior to renovation or demolition. If those materials are friable or likely to become friable due to the forces expected to act upon them during renovation or demolition, they become a regulated asbestos containing material (RACM) and require a 10-day notification to the local Air Pollution Control District prior to abatement.

Non-friable and non-regulated ACM, in most cases, may be disposed of as a Non-Hazardous waste in a landfill that accepts Asbestos Containing Materials. All friable waste containing more than 1% asbestos (RACM) must be manifested as hazardous waste for disposal purposes.

**CAL OSHA-----Construction Industry-----8CCR, 1529**

Cal/OSHA worker health and safety regulations apply during any disturbance of ACM by a person while in the employ of another. This is true regardless of friability or quantity disturbed. If there is greater than 100 square feet of ACM which will be affected by the demolition, a California Licensed Contractor who is registered with Cal/OSHA for asbestos is required. The regulations regarding asbestos are found in Title 8 CCR Section 1529, and also include formal notification requirements to Cal/OSHA at least 24 hours prior to removal. It is required that removal be conducted with the material kept in a wetted state to contain dust and hazardous emissions.

The construction industry standard covers employees engaged in demolition and construction, and the following related activities likely to involve asbestos exposure: removal, encapsulation, alteration, repair, maintenance, insulation, spill emergency cleanup, transportation, disposal and storage of ACM.

Demolition contractors typically require that a building owner/operator accept responsibility for removal of all ACM found during the building inspection prior to start of demolition activities.

LIMITATIONS OF LIABILITY
--------------------------

Conclusions and recommendations presented in this report are qualitative judgments based on the prevailing regulations and accepted industry standards at the time of the report issuance. Leon Environmental Services provides no other guarantees, either expressed or implied. All quantities of materials listed herein are estimates for sampling

**Asbestos Survey: Trails End Mobile Home Park – Space 27,**  
**104 E. Sierra Ave, Fresno, CA**  
**S123-21-01**

purposes only, and should be verified by Owner representative or an abatement contractor prior to asbestos abatement.

The nature of demolition and asbestos abatement is such that materials can be uncovered which previously were unknown to exist. Therefore, Leon Environmental Services cannot be responsible for materials not previously detected due to lack of accessibility or concealment, although every effort was made during the inspection to detect all suspect materials. If any materials other than those included herein are discovered during renovation or demolition, it must be assumed that the materials are asbestos containing, and should be treated accordingly until further testing and analysis is performed.

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**Thomas M. Leon**

Digitally signed by Thomas M. Leon  
DN: cn=Thomas M. Leon, o=Leon Environmental  
Services, ou, email=leonenviro@comcast.net, c=US  
Date: 2021.10.15 16:11:02 -07'00'

---

Thomas Leon  
Certified Asbestos Consultant  
Certification No. 05-3882

DATE:

**\*Abbreviation Key:**

*Asbestos Containing Material — ACM (equal to or greater than 0.1% by weight)*  
*Vinyl Asbestos Tile – VAT*  
*No Asbestos Detected--N.A.D or N.D.*  
*Homogeneous—H*  
*Not Sampled--NS*

# Leon Environmental Services

Richard "Danny" Leon CAC Certification No. 04-3708

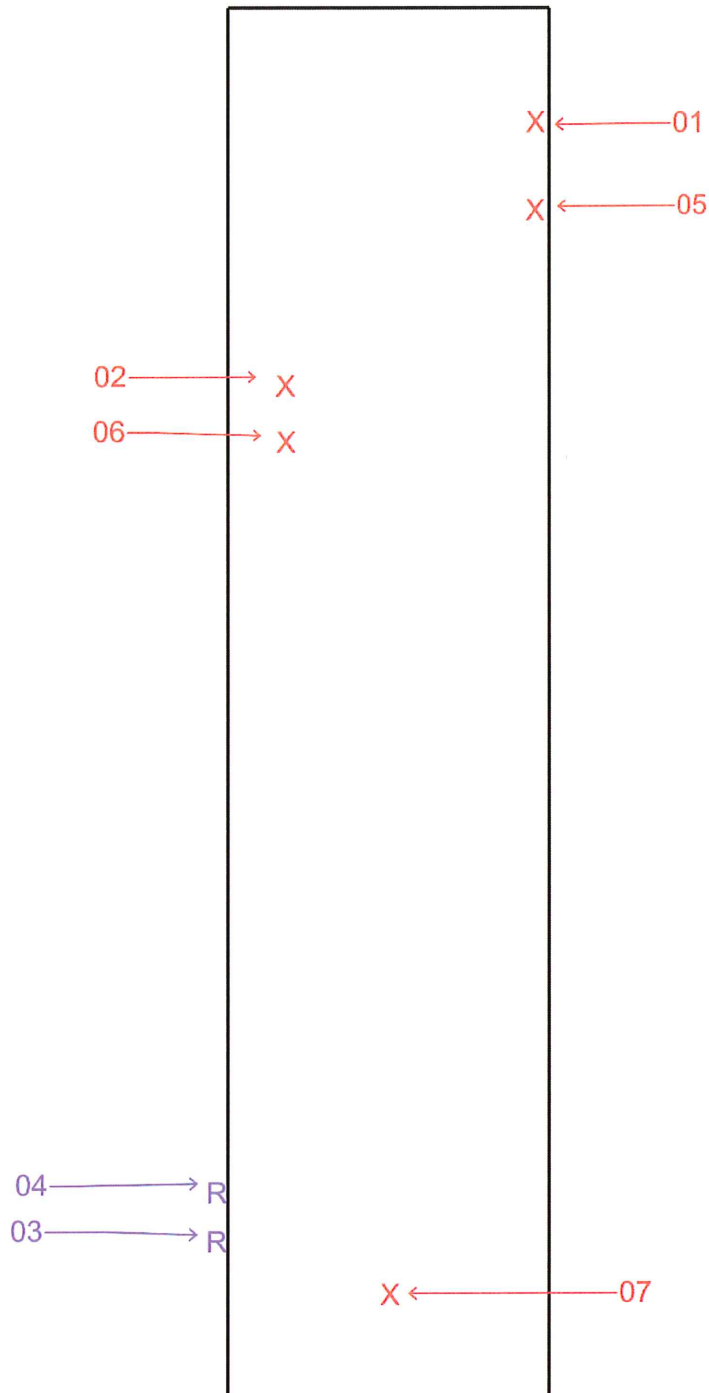
Tommy Leon CAC Certification No. 05-3882

## Job S123-21 Sample Location Diagram

Trails End Mobile Home Park – Space 27 /104 E. Sierra Ave, Fresno, CA

John Frost / John H Frost, AIA Architect

Drawing not to Scale



Y = Exterior Samples  
X = Interior Samples  
R = Roof Samples







WESTERN ANALYTICAL LABORATORY, Inc.  
TEST REPORT



REPORT NO: 153-732 CLIENT: Leon Environmental Services  
DATE COLLECTED: October 13, 2021 4545 N. Brawley Ave., Suite 104  
Fresno CA 93722  
DATE RECEIVED: October 14, 2021 ATTENTION: Danny Leon (CAC# 04-3708)  
DATE REQUIRED: October 15, 2021 REFERENCE: S123-21-01  
John Frost - John H. Frost, AIA Architect  
Trails End Mobile Home Park, Space 27  
104 E. Sierra Avenue, Fresno, CA

SUBJECT: Polarized Light Microscopy Analysis for Asbestos; 7 samples

METHODOLOGY: "Method for the Determination of Asbestos in Bulk Building Materials" (EPA 600/R-93/116)

ACCREDITED: National Institute of Standards and Technology (NVLAP) # 200037

SAMPLE ID NUMBER	SAMPLE LOCATION AND DESCRIPTION	NON-FIBROUS MATERIALS	OTHER FIBROUS MATERIALS	ASBESTIFORM MINERALS
01	North East Area Floor  Linoleum	Granular Minerals Resin Organics	Cellulose 10% Synthetics 5%	None Detected
02	Middle Area Floor  Floor tile	Granular Minerals Resin Organics	None Detected	None Detected
03	Roof  Roof sealant / Vapor barrier	Granular Minerals Organics	Cellulose 2%	None Detected
04	Roof  Roof mastic	Granular Minerals Organics (tar)	None Detected	None Detected

t: Trace (>1% = greater than 1%, <1% = less than 1%)

Note: Sample #05, 06, 07 were gravimetrically reduced by ashing before PLM analysis

  
Optical Microscopist

  
Mike Maladzhikyan, Laboratory Director

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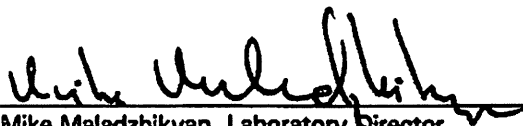
REPORT # 153-732 continued:

REFERENCE: S123-21-01 / John Frost - John H. Frost, AIA Architect / Trails End Mobile Home Park, Space 27 104 E.  
Sierra Avenue, Fresno, CA

SAMPLE ID NUMBER	SAMPLE LOCATION AND DESCRIPTION	NON-FIBROUS MATERIALS	OTHER FIBROUS MATERIALS	ASBESTIFORM MINERALS
05	North East Area  Burn debris	Granular Minerals Opagues	Cellulose (burned) Fiberglass	None Detected
06	Middle Area  Burn debris	Granular Minerals Opagues	Cellulose (burned) Fiberglass	None Detected
07	South Area  Burn debris	Granular Minerals Opagues	Cellulose (burned) Fiberglass	None Detected

t. Trace    >1% = greater than 1%    <1 = less than 1%

  
\_\_\_\_\_  
Optical Microscopist

  
\_\_\_\_\_  
Mike Maladzhikyan, Laboratory Director

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# *Leon Environmental Services*

Richard "Danny" Leon CAC # 04-3708

Tommy Leon CAC # 05-3882

October 23, 2021

George Santikian  
**Trails End Mobile Home Park**  
1207 W. Fremont Ave  
Fresno, CA 93711

**Re: Asbestos Survey**  
**Trails End Mobile Home Park – Space 28**  
**Burned Mobile Home**  
**104 E. Sierra Ave.**  
**Fresno, CA**  
**Job No. S123-21-02**

Dear George:

Attached is the asbestos survey report for the above referenced building. This report includes inspection observations, a list of all samples taken, bulk sample analysis results, a sample location drawing, and recommendations concerning asbestos containing materials.

If you have any questions or need additional information, please do not hesitate to call. Thank you for using Leon Environmental Services. We look forward to working with you in the future.

Respectfully,

Tommy Leon  
Certified Asbestos Consultant  
Certification No. 05-3882

**Asbestos Survey: Trails End Mobile Home Park – Space 28,  
104 E. Sierra Ave, Fresno, CA  
S123-21-02**

BUILDING DESCRIPTION

An asbestos survey was performed on **October 13, 2021** at **104 E. Sierra Ave, Fresno, CA, Space #28, Fresno, CA**. The mobile home is approximately 40-50 years old and the debris area was approximately 800sqft. It was severely burned by a local fire. The original construction had a wood floor, metal exterior walls and a metal roof. The burned debris pile that is left at the site had few recognizable building materials. The building materials identified were flooring materials and roofing materials. At the time of the survey the site was accessible.

ASBESTOS ANALYSIS RESULTS

All bulk samples of suspect asbestos containing materials were taken in accordance with US EPA Guidelines and accepted industry standards by a state certified asbestos consultant. Western Analytical Laboratory, Inc., a NVLAP accredited laboratory performed a total of **12** analyses from **08** samples collected from this structure at this site. The full list of all samples taken is on the following pages. Sample locations are indicated on the drawings included with this report. ***Quantities listed below are estimates, for sampling purposes only, and should be verified prior to asbestos abatement.***

Sample	Location	Material	% Of ACM	Friable	Sq. Ft.
01	East Area – Floor	Floor Tile	ND		
02	West Area – Floor	Linoleum	ND		
03	Roof	Roofing Felts	ND		
04	Roof	Tar Paper	ND		
05	Southwest Area	Burn Debris	ND		
06	Northeast Area	Burn Debris	ND		
07	Northwest Area	Burn Debris	ND		
08	Roof	Roof Mastic	ND		

COMMENTS AND RECOMMENDATIONS

**All samples of suspect materials from this site were negative for asbestos.**

**Asbestos Survey: Trails End Mobile Home Park – Space 28,**  
**104 E. Sierra Ave, Fresno, CA**  
**S123-21-02**

CONCLUSIONS AND REGULATIONS
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**US EPA NESHAP (40 CFR Part 61)**

Based on our survey, sampling and subsequent laboratory analysis and regulatory guidelines affecting this site, the types of ACM identified on the previous page require removal (in most cases) prior to demolition and/or renovation procedures to comply with local, state and federal agencies. The US EPA NESHAP (40 CFR Part 61 – November 20, 1990) requires materials containing greater than one percent asbestos be removed prior to renovation or demolition. If those materials are friable or likely to become friable due to the forces expected to act upon them during renovation or demolition, they become a regulated asbestos containing material (RACM) and require a 10-day notification to the local Air Pollution Control District prior to abatement.

Non-friable and non-regulated ACM, in most cases, may be disposed of as a Non-Hazardous waste in a landfill that accepts Asbestos Containing Materials. All friable waste containing more than 1% asbestos (RACM) must be manifested as hazardous waste for disposal purposes.

**CAL OSHA-----Construction Industry-----8CCR, 1529**

Cal/OSHA worker health and safety regulations apply during any disturbance of ACM by a person while in the employ of another. This is true regardless of friability or quantity disturbed. If there is greater than 100 square feet of ACM which will be affected by the demolition, a California Licensed Contractor who is registered with Cal/OSHA for asbestos is required. The regulations regarding asbestos are found in Title 8 CCR Section 1529, and also include formal notification requirements to Cal/OSHA at least 24 hours prior to removal. It is required that removal be conducted with the material kept in a wetted state to contain dust and hazardous emissions.

The construction industry standard covers employees engaged in demolition and construction, and the following related activities likely to involve asbestos exposure: removal, encapsulation, alteration, repair, maintenance, insulation, spill emergency cleanup, transportation, disposal and storage of ACM.

Demolition contractors typically require that a building owner/operator accept responsibility for removal of all ACM found during the building inspection prior to start of demolition activities.

LIMITATIONS OF LIABILITY
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Conclusions and recommendations presented in this report are qualitative judgments based on the prevailing regulations and accepted industry standards at the time of the report issuance. Leon Environmental Services provides no other guarantees, either expressed or implied. All quantities of materials listed herein are estimates for sampling

**Asbestos Survey: Trails End Mobile Home Park – Space 28,**  
**104 E. Sierra Ave, Fresno, CA**  
**S123-21-02**

purposes only, and should be verified by Owner representative or an abatement contractor prior to asbestos abatement.

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**Thomas M. Leon**

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Services, ou, email=leonenviro@comcast.net, c=US  
Date: 2021.10.15 16:15:07 -07'00'

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Thomas Leon  
Certified Asbestos Consultant  
Certification No. 05-3882

DATE:

**\*Abbreviation Key:**

*Asbestos Containing Material — ACM (equal to or greater than 0.1% by weight)*  
*Vinyl Asbestos Tile – VAT*  
*No Asbestos Detected--N.A.D or N.D.*  
*Homogeneous—H*  
*Not Sampled--NS*



# Leon Environmental Services

Richard "Danny" Leon CAC Certification No. 04-3708

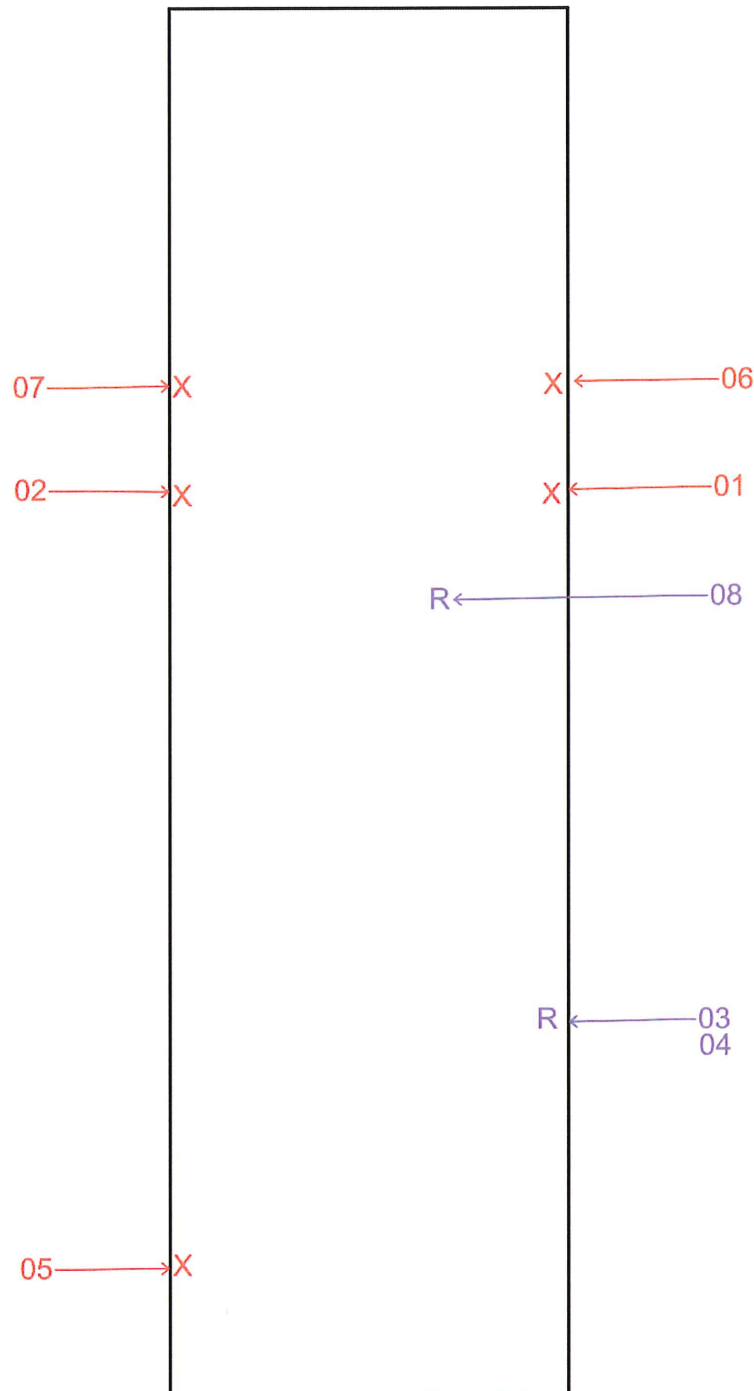
Tommy Leon CAC Certification No. 05-3882

## Job S123-21 Sample Location Diagram

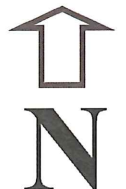
Trails End Mobile Home Park – Space 28 /104 E. Sierra Ave, Fresno, CA

John Frost / John H Frost, AIA Architect

Drawing not to Scale



Y = Exterior Samples  
X = Interior Samples  
R = Roof Samples



5126

4545 N. Brawley Ave., Suite 104, Fresno, CA 93722 Phone: 559.274.9200 Fax: 559.274.9240 Email: [LeonEnviro@comcast.net](mailto:LeonEnviro@comcast.net)

**Company** **John H. Frost, AIA Architect**

Date: **October 13, 2021**

Analysis PLM

**Inspection Site: Trails End Mobile Home Park, Space 28, 104 E. Sierra Ave, Fresno, CA**

[illegible]

**~~Relinquished~~**

By Jeffrey Lee

Date 10-13-21

Received  
By

due VN

Date \_\_\_\_\_

10	14	21
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**WESTERN ANALYTICAL LABORATORY, Inc.**  
**TEST REPORT**



REPORT NO: 153-733 CLIENT: Leon Environmental Services  
DATE COLLECTED: October 13, 2021 4545 N. Brawley Ave., Suite 104  
Fresno CA 93722  
DATE RECEIVED: October 14, 2021 ATTENTION: Danny Leon (CAC# 04-3708)  
DATE REQUIRED: October 15, 2021 REFERENCE: S123-21-02  
John Frost - John H. Frost, AIA Architect  
Trails End Mobile Home Park, Space 28  
104 E. Sierra Avenue, Fresno, CA

SUBJECT: Polarized Light Microscopy Analysis for Asbestos; 8 samples

METHODOLOGY: "Method for the Determination of Asbestos in Bulk Building Materials" (EPA 600/R-93/116)

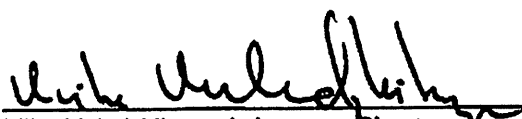
ACCREDITED: National Institute of Standards and Technology (NVLAP) # 200037

SAMPLE ID NUMBER	SAMPLE LOCATION AND DESCRIPTION	NON-FIBROUS MATERIALS	OTHER FIBROUS MATERIALS	ASBESTIFORM MINERALS
01	East Area Floor Floor tile	Granular Minerals Organics Gypsum	Cellulose <1%	None Detected
02	West Area Floor Linoleum	Granular Minerals Resin Organics	Cellulose 10% Synthetics 10%	None Detected
03	Roof Roofing felts	Granular Minerals Organics (tar)	Fiberglass 1-2%	None Detected
04	Roof Tar paper	Granular Minerals Organics (tar)	Fiberglass 10%	None Detected

t: Trace (>1% = greater than 1%, <1% = less than 1%)

Note: Sample #03, 05, 06, 07 were gravimetrically reduced by ashing before PLM analysis

  
Optical Microscopist

  
Mike Maladzhikyan, Laboratory Director

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REPORT # 153-733 continued:

REFERENCE: S123-21-02 / John Frost - John H. Frost, AIA Architect / Trails End Mobile Home Park, Space 28 104 E.  
Sierra Avenue, Fresno, CA

SAMPLE ID NUMBER	SAMPLE LOCATION AND DESCRIPTION	NON-FIBROUS MATERIALS	OTHER FIBROUS MATERIALS	ASBESTIFORM MINERALS
05	South West Area  Burn debris	Granular Minerals Opakes	Fiberglass Cellulose (burned)	None Detected
06	North East Area  Burn debris	Granular Minerals Opakes	Glass Wool Cellulose (burned)	None Detected
07	North West Area  Burn debris	Granular Minerals Opakes	Fiberglass Cellulose (burned)	None Detected
08	Roof  Roof mastic	Granular Minerals Organics (tar)	Cellulose 5%	None Detected

t: Trace >1% = greater than 1% <1 = less than 1%

  
Optical Microscopist

  
Mike Maladzhikyan, Laboratory Director

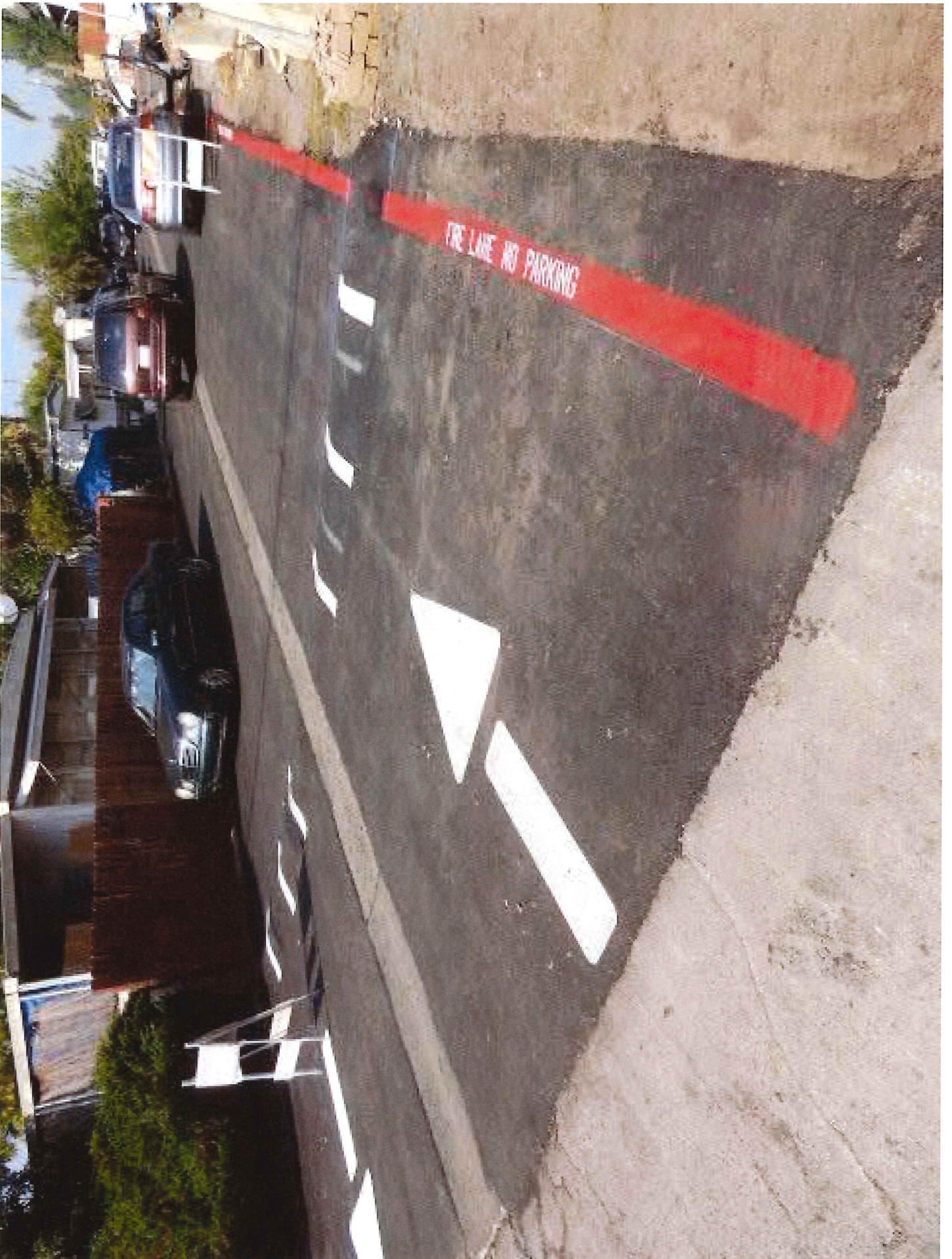
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# **EXHIBIT D**





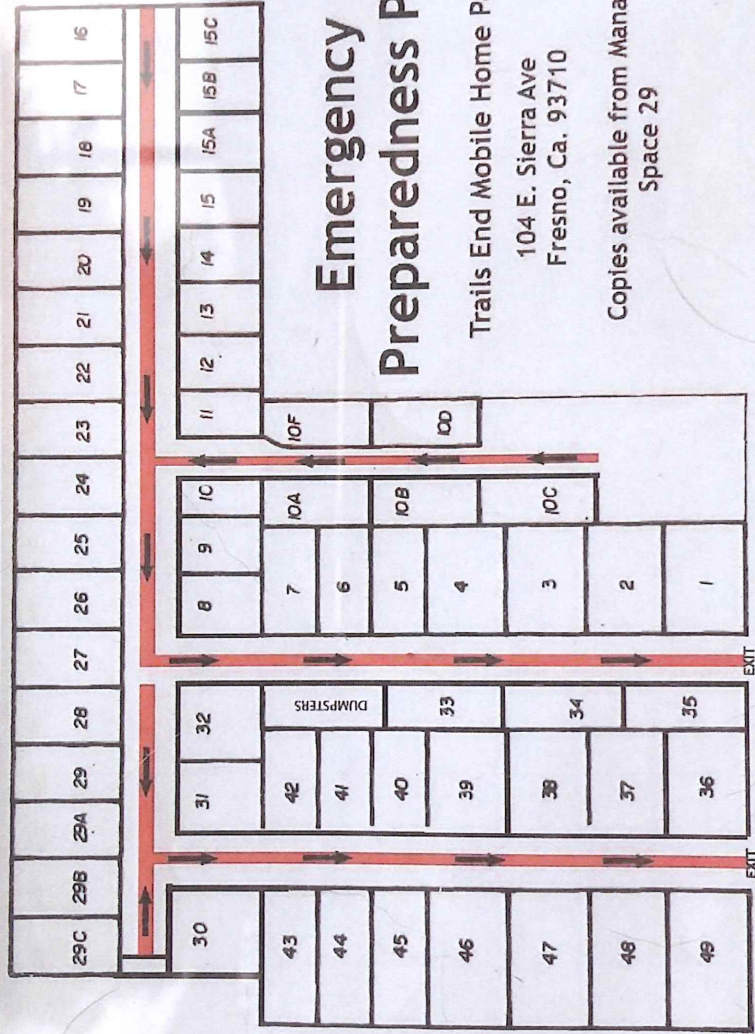


# **EXHIBIT E**









# Emergency Preparedness Plan

Trails End Mobile Home Park  
104 E. Sierra Ave  
Fresno, Ca. 93710

Copies available from Manager  
Space 29