

Limited Asbestos & Lead-Based Paint Survey Report *Renovation, Commercial Property*

Site: 90 Fifth Street, Spreckels, California

S Tech Project: 18040

Prepared for: Spreckels Memorial District

March 19, 2018

S Tech Consulting was retained by Spreckels Memorial District to conduct limited asbestos and lead-based paint sampling of the commercial building located at 90 Fifth Street in Sprekels, California. The renovation work will specifically impact two restrooms within the Community Hall facility. Due to the age of the structure, the planned improvements will impact suspect asbestos containing materials and lead-based paints.

Prior to conducting renovation or demolition, the EPA and Cal-OSHA require the sampling of building materials to determine whether asbestos is present. When asbestos is identified and will be disturbed, it must be handled and disposed of by trained and licensed personnel, to prevent the creation of an airborne asbestos hazard. Lead paint is regulated by EPA and OSHA to prevent creating a lead exposure hazard for workers and especially children. The EPA Renovation, Repair, and Painting Rule (RRP), requires either assuming pre-1978 structures contain lead-based paints or testing to prove otherwise.

The site visit took place on March 12, 2018 by Sean Tillema, a DOSH Certified Asbestos Consultant (CAC 07-4257), and California Department of Public Health Certified Lead Related Construction Inspector / Risk Assessor (1646).

Scope of Work & Property Description

Our scope of work was limited to testing specific interior components that will be impacted by the renovation to the men's and women's restrooms, as directed by the client. This was not a comprehensive assessment of all suspect materials associated with the structure. For the areas assessed, our assessment was in accordance with the requirements of the Monterey Bay Unified Air Pollution Control District (MBUAPCD). Lead testing was for compliance for Cal-OSHA Lead in Construction's standard.

The scope of work calls for both the men's and women's restrooms within the Community Hall facility to undergo renovation work.

Interior walls and ceilings within the assessment area are plaster with a button board backing. There is also ceramic wall tile adhered to the plaster walls in both restrooms.

Flooring that will be impacted by the renovation work includes ceramic floor tile.



Asbestos Containing Materials

[Asbestos-containing material \(ACM\)](#) is defined by the United States Environmental Protection Agency (EPA) as material containing **more than one percent asbestos** as determined by Polarized Light Microscopy (PLM). In California, for contractor licensing and employee protection, the California Department of Occupational Safety and Health (Cal-OSHA) classifies any material as having greater than one tenth of one percent (>0.1%) asbestos as [Asbestos-Containing Construction Material \(ACCM\)](#). Asbestos containing material are divided into friable and non-friable classifications. Friability refers to the likelihood of the material readily releasing airborne fibers when disturbed. Materials which are non-friable in-situ have the potential to become friable when deteriorated or when renovation or demolition occurs.

The following conclusions were arrived at from the field inspection and the analytical results:

- * **The plaster associated with the men’s and women’s restrooms and the hallway contains a trace asbestos content of less than (<) 0.1% Chrysotile, confirmed by 1000 point count analysis. Materials containing less than one percent asbestos, confirmed by more precise point count analysis, are not regulated by the EPA for renovation, demolition, or disposal. For Cal-OSHA compliance, the plaster is referred to as ‘Unclassified Asbestos’, falling below the threshold of classification for ACM (>1%) or ACCM (>0.1%). While disturbance to the plaster does not require the contractor to be DOSH asbestos registered, all contractors must remain in compliance with Title 8 Section 1529. Throughout Title 8 Section 1529 there are requirements pertaining to asbestos in any amount or concentration.**

Analysis was performed by AmeriSci Los Angeles, a NVLAP accredited laboratory, on a forty-eight hour laboratory turnaround time. Seven samples were collected and submitted to the laboratory. Once at the lab, the submitted samples required no further separation. Following the review of the initial PLM analysis, three materials were subjected to more precise point count analysis to allow for better characterization of the asbestos content in the materials. The table below is a summary of materials identified to contain asbestos. Following the summary table, is a listing of all materials collected from the site, with samples in red containing asbestos. The laboratory report is attached at the end of this document. See the summary for additional information.

Asbestos Summary Table				
Asbestos Material	Locations	Analytical Results	Classification	Approximate Quantity to be Removed
Plaster	Men's & Women's Restroom & Hallway	<0.1% Chrysotile By 1000 Point Count	EPA: Non-Regulated Cal-OSHA: 'Unclassified Asbestos'	To Be Determined By The Scope Of The Renovations

Asbestos Containing Materials - continued

Asbestos Bulk Sample Table			
Sample Number	Material Sampled	Sample Location	Analytical Results NAD = No Asbestos Detected
040-1	Plaster	Hallway - Drinking Fountain	<0.1% Chrysotile By 1000 Point Count
040-2	Ceramic Tile Grout	Women's Restroom	NAD
040-3	Ceramic Tile Grout	Men's Restroom	NAD
040-4	Plaster	Women's Restroom	<0.1% Chrysotile By 1000 Point Count
040-5	Button Board	Women's Restroom	NAD
040-6	Plaster	Men's Restroom	<0.1% Chrysotile By 1000 Point Count
040-7	Button Board	Men's Restroom	NAD

Lead-Based Paint & Glazings

Lead-Based Paint (LBP), as defined by EPA, is of concern both as a source of direct exposure through ingestion of paint chips, and as a contributor to lead interior dust and exterior soil. Lead was widely used as a major ingredient in most interior and exterior oil-based paints prior to 1950. Lead compounds continued to be used as corrosion inhibitors, pigments and drying agents from the early 1950's. In 1972, the Consumer Products Safety Commission limited lead content in new paint to 0.5% (5000 ppm) and, in 1978, to 0.06% (600 ppm). **Today, for purposes of lead-based paint inspection, for childhood lead poisoning prevention, EPA defines LBP as paint containing greater than 0.5% (5000 ppm) lead by weight or greater than 1.0 mg/cm² by surface area. This report applies the 1.0 mg/cm² reference standard, which applies to X-ray Fluorescence (XRF) testing.**

The State of California has enacted a number of regulations to minimize lead exposure in children and adults. Specifically, [Title 17, California Code Of Regulations, Division 1, Chapter 8 Accreditation, Certification, and Work Practices For Lead-Based Paint and Lead Hazards](#) and a number of California Civil and Health and Safety Codes, provide requirements for lead-safe housing and the prevention of lead hazards from developing in housing. A complete list of all State of California LBP regulations is available at the [CDPH Childhood Lead-Poisoning Prevention Branch website](#). The California Department of Public Health (CDPH) is the agency responsible for enforcing compliance with existing state LBP regulations.

For occupational lead exposure in the construction and building maintenance industries, lead is regulated below the threshold set by the EPA for lead-based paint. Additionally, OSHA does not limit lead health and safety requirements to paint. Many other building materials and manufactured items are known to contain lead. Adult occupational tasks may result in exposure to lead even when working with low lead concentrations. Tasks such as abrasive blasting, flame torch usage, and mechanical grinding are especially prone to occupational lead exposure. When lead is present in any concentration, Cal-OSHA, under Title 8 CCR Section 1532.1, requires employers to evaluate the task performed and conduct an exposure assessment. Based on the results of the exposure assessment, engineering controls and personal protective equipment may be necessary to reduce occupational lead exposure. Additional information is available from this Cal-OSHA fact sheet: http://www.dir.ca.gov/dosh/dosh_publications/lead-fct-sheet-rev.pdf

Paint testing at this property was conducted by X-ray Fluorescence (XRF), which provides instant onsite analysis, penetrating all paint layers.

The following conclusions were arrived at from the testing:

- * **EPA defined Lead-Based Paint (>1.0 mg/cm² by XRF) was not identified in coatings anticipated to be impacted by the scope of the renovations.**
- * **Ceramic wall and base tile in the men's and women's restrooms contain high lead content in the glazing. Uncontrolled demolition of ceramic finishes has the potential to release lead containing particulate, once the glaze is shattered.**
- * **For contractor employee OSHA compliance, all paints had a quantifiable lead content and are subject the requirements of the Cal-OSHA Lead in Construction Standard (Title 8 CCR Section 1532.1) when conducting trigger tasks which could result in occupational exposure to lead. Such high risk trigger tasks include abrasive blasting, flame torch usage, and mechanical grinding.**

The table on the following page is a summary of components identified to contain high lead content. Following the summary table is a table listing the results of all the components tested. See summary for additional information.

Lead-Based Paint - continued

The table below lists the components identified coated with EPA LBP at the subject building. *EPA Lead-Based Paint is lead content in excess of 5,000 ppm by bulk analysis or **greater than 1.0 mg / cm² by XRF*** Note, lead in any amount may be regulated by Cal-OSHA for worker protection.

Lead (Pb) Sampling Table				
Location	Component	Substrate	Analytical Results XRF: mg/cm²	Classification
Men's & Women's Restroom	Wall & Base Tile	Ceramic	>5.00	High Lead Content

Lead-Based Paint - continued

The table below lists the painted and/or glazed components tested as part of this assessment. *EPA Lead-Based Paint is lead content in excess of 5,000 ppm by bulk analysis or greater than 1.0 mg / cm² by XRF* Note, lead in any amount may be regulated by Cal-OSHA for worker protection.

Lead (Pb) Content by X-ray Fluorescence			
Area	Component	Substrate	Lead Content mg/cm²
Men's Restroom	Floor Tile	Ceramic	<0.01
Men's Restroom	Base Tile	Ceramic	>5.00
Men's Restroom	Wall Tile	Ceramic	>5.00
Men's Restroom	Wall	Plaster	0.01
Men's Restroom	Wall	Plaster	0.03
Men's Restroom	Wall	Plaster	0.02
Men's Restroom	Wall	Plaster	0.03
Men's Restroom	Ceiling	Plaster	0.02
Men's Restroom	Door	Wood	<0.01
Men's Restroom	Door Frame	Wood	<0.01
Men's Restroom	Partition	Wood	<0.01
Women's Restroom	Floor Tile	Ceramic	<0.01
Women's Restroom	Base Tile	Ceramic	>5.00

Lead-Based Paint - continued

The table below lists the painted and/or glazed components tested as part of this assessment. *EPA Lead-Based Paint is lead content in excess of 5,000 ppm by bulk analysis or greater than 1.0 mg / cm² by XRF* Note, lead in any amount may be regulated by Cal-OSHA for worker protection.

Lead (Pb) Content by X-ray Fluorescence			
Area	Component	Substrate	Lead Content mg/cm ²
Women's Restroom	Wall Tile	Ceramic	>5.00
Women's Restroom	Wall	Plaster	0.02
Women's Restroom	Wall	Plaster	0.01
Women's Restroom	Wall	Plaster	0.02
Women's Restroom	Wall	Plaster	0.03
Women's Restroom	Ceiling	Plaster	0.03
Women's Restroom	Door	Wood	<0.01
Women's Restroom	Door Frame	Wood	<0.01
Women's Restroom	Partition	Wood	<0.01
Women's Restroom	Door Frame	Wood	<0.01
Women's Restroom	Partition	Wood	<0.01

Summary of Findings

Asbestos

When conducting renovation or demolition, A State of California [C-22](#) Licensed Asbestos Abatement Contractor who is Division of Occupational Safety & Health (DOSH) registered, must be retained when disturbing materials containing greater than 0.1% asbestos (Asbestos Containing Construction Material). All work must be conducted in strict accordance with Cal-OSHA's asbestos standard, [8 CCR 1529](#) and the requirements of the Monterey Bay Unified Air Pollution Control District's (MBUAPCD) [Rule 424](#). Waste must be disposed of in the correct landfill for the classification of asbestos being removed.

Regulated Asbestos Containing Material (RACM) will not be impacted by the scope of the current renovations. A notification to the Monterey Bay Unified Air Pollution Control District (MBUAPCD) would only be necessary if load bearing walls will be removed as part of this renovation project. If such work will occur, a notification for demolition must be submitted ten business days prior to the start of work.

All parties working on this project should be aware that concealed spaces may harbor additional suspect material. Asbestos cement pipes may be concealed within wall cavities and found in underground utility pipes. Should any additional suspect materials be identified during the course of the demolition work, stop work and contact us to assess and sample if necessary.

Lead

Lead-Based Paint was not identified in any of the coatings expected to be impacted by the scope of the renovations. No further action is required with regards to LBP.

Ceramic tile applications, where high lead content was identified, can release lead particulate during demolition activities, creating a lead risk hazard for building employees and contract staff. Lead-safe work practices should be implemented during ceramic tile removal to ensure lead particulate is appropriately contained. HEPA vacuums should be used when conducting cleaning after demolition work. All wastes must be appropriately disposed of.

All paints anticipated to be disturbed by the scope of the renovation contain a detectable lead content and fall all under the requirements of the Cal-OSHA Lead in Construction Standard (CCR Title 8, Section 1532.1). Employers who task employees with activities that could result in an occupational exposure to lead must follow the requirements of the Cal-OSHA standard to ensure their employees are protected. Contractors should collect exposure data on their employees or have historical data from similar tasks and projects. Employers not familiar with the requirements of the Lead in Construction standard can download a brief Cal-OSHA fact sheet by following this link http://www.dir.ca.gov/dosh/dosh_publications/lead-ct-sheet-rev.pdf

This was a limited survey focusing on specific locations and materials. Other suspect materials may be present in a building of this age. If the scope of work expands, suspect materials must be tested prior to disturbing. This survey should remain onsite for the duration of the project.

If you have any questions please feel free to call us at 831.883.8415

S Tech Consulting



Sean P. Tillema

**Certified Asbestos Consultant (CAC) #07-4257
Certified Lead Inspector / Risk Assessor #1646**

Limitations

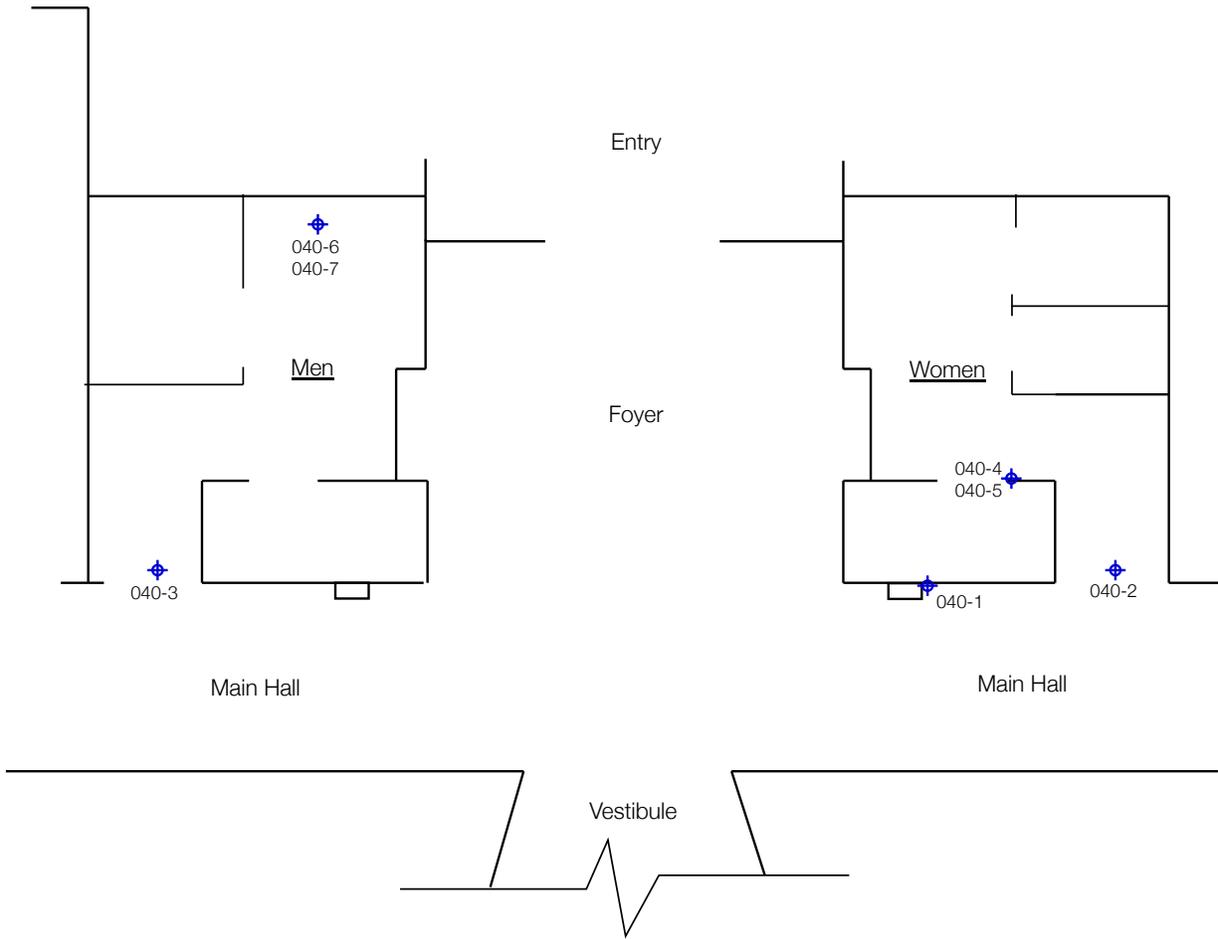
This report is not intended to identify all hazards or unsafe conditions or to imply that others do not exist. This survey was planned and implemented on the basis of a mutually agreed scope of work and S Tech's experience in performing this type of assessment.

Areas outside our scope or inaccessible areas are excluded from this report. This was not a survey of the entire facility.

S Tech Consulting has performed this survey in a professional manner using the degree of skill and care exercised for similar projects under similar conditions, by reputable and competent environmental consultants. S Tech Consulting shall not be responsible for conditions or consequences arising from relevant facts that were concealed, withheld, or not fully disclosed at the time that this survey was conducted.

S Tech Consulting further states that no warranties, expressed or implied, are made regarding the quality, fitness, or results to be achieved as a consequence of this report or impacted by information not properly disclosed to S Tech at the time of this report. It further states that no responsibility is assumed for the control or correction of conditions or practices existing at the premises of the client.

Site Plan & Bulk Sample Locations



- ▽ Indicates Exterior Sample Location
- ◆ Indicates Interior Sample Location



DATE PREPARED: 3/14/18	SOURCE: DT
REVISION:	REVISION DATE:
PROJECT NO: 18040	SCALE: NTS

DRAWING TITLE:
Asbestos Site Sample Location Plan

PROJECT NAME:
90 Fifth Street, Spreckels, California

CLIENT:
Spreckels Memorial District

FIGURE NO. **1**

Laboratory Analytical Reports



Please Reply To:

AmeriSci Los Angeles

24416 S. Main Street, Ste 308

Carson, California 90745

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FACSIMILE TELECOPY TRANSMISSION

To: Sean Tillema
STech Consulting LLC

From: Paola Ducoing
AmeriSci Job #: 918031300

Fax #:

Subject: PLM 48 hour Results
Client Project: 18040; Spreckels Memorial District; 90 Fifth St. Spreckels, CA

Email: Sean@stechconsulting.com, consultingstech@gmail.com, david@stechconsulting.com

Date: Wednesday, March 14, 2018
Time: 14:40:06

Number of Pages: 4
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Comments:

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PLM Bulk Asbestos Report

STech Consulting LLC
Attn: Sean Tillema
484B Washington Street, #401
Monterey, CA 93940

Date Received 03/13/18 **AmeriSci Job #** 918031300
Date Examined 03/14/18 **P.O. #**
Page 1 of 2
RE: 18040; Spreckels Memorial District; 90 Fifth St. Spreckels, CA

Client No. / HGA	Lab No.	Asbestos Present	Total % Asbestos
040-1 Location: Plaster - Hallway - Drinking Fountain	918031300-01	Yes	Trace (<1 %) (by CVES) by Paola Ducoing on 03/14/18
Analyst Description: White, Homogeneous, Non-Fibrous, Cementitious, Plaster Asbestos Types: Chrysotile <1. % Other Material: Non-fibrous 100 %			
040-2 Location: Ceramic Tile Grout - Women's Restroom	918031300-02	No	NAD (by CVES) by Paola Ducoing on 03/14/18
Analyst Description: Grey, Heterogeneous, Non-Fibrous, Cementitious, Grout Asbestos Types: Other Material: Non-fibrous 100 %			
040-3 Location: Ceramic Tile Grout - Men's Restroom	918031300-03	No	NAD (by CVES) by Paola Ducoing on 03/14/18
Analyst Description: Grey, Heterogeneous, Non-Fibrous, Cementitious, Grout Asbestos Types: Other Material: Non-fibrous 100 %			
040-4 Location: Plaster - Women's Restroom	918031300-04	Yes	Trace (<1 %) (by CVES) by Paola Ducoing on 03/14/18
Analyst Description: White, Heterogeneous, Non-Fibrous, Cementitious, Plaster Asbestos Types: Chrysotile <1. % Other Material: Non-fibrous 100 %			
040-5 Location: Button Board - Women's Restroom	918031300-05	No	NAD (by CVES) by Paola Ducoing on 03/14/18
Analyst Description: Brown, Homogeneous, Fibrous, Button Board Asbestos Types: Other Material: Cellulose 20 %, Non-fibrous 80 %			

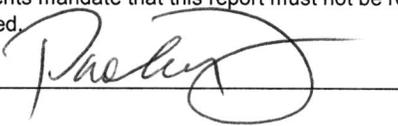
PLM Bulk Asbestos Report

18040; Spreckels Memorial District; 90 Fifth St. Spreckels, CA

Client No. / HGA	Lab No.	Asbestos Present	Total % Asbestos
040-6 Location: Plaster - Men's Restroom	918031300-06	Yes	Trace (<1 %) (by CVES) by Paola Ducoing on 03/14/18
Analyst Description: White, Heterogeneous, Non-Fibrous, Cementitious, Plaster Asbestos Types: Chrysotile <1. % Other Material: Non-fibrous 100 %			
040-7 Location: Button Board - Men's Restroom	918031300-07	No	NAD (by CVES) by Paola Ducoing on 03/14/18
Analyst Description: Brown, Homogeneous, Fibrous, Button Board Asbestos Types: Other Material: Cellulose 5 %, Non-fibrous 95 %			

Reporting Notes:

Analyzed By: Paola Ducoing ; Date Analyzed: 3/14/2018 3/14/18
*NAD = no asbestos detected; Detection Limit <1%; Reporting Limits: CVES = 1%, 400 Pt Ct = 0.25%, 1000 Pt Ct = 0.1%; NA = not analyzed; NA/PS = not analyzed / positive stop; NVA = No Visible Asbestos; PLM (polarized light microscopy) Bulk Asbestos Analysis by EPA 600/R-93/116, including requirements for EPA 600/M4-82-020 per 40 CFR 763 (NVLAP Lab #200346-0, CA ELAP lab #2322); Note: PLM is not consistently reliable in detecting asbestos in floor coverings and similar NOB materials. TEM is currently the only method that can be used to determine if this material can be considered or treated as non-asbestos-containing in New York State (also see EPA Advisory for floor tile, FR 59, 146, 38970, 8/1/94). NIST Accreditation requirements mandate that this report must not be reproduced except in full with the approval of the laboratory. This PLM report relates ONLY to the items tested.

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Carson, California 90745
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To: Sean Tillema
STech Consulting LLC
Fax #:
Email: Sean@stechconsulting.com, consultingstech@gmail.com, david@stechconsulting.com

From: Paola Ducoing
AmeriSci Job #: 918031368
Subject: PLM 1000 point count 24 hour Res
Client Project: 18040; Spreckels Memorial District; 90 Fifth St. Spreckels, CA

Date: Friday, March 16, 2018

Time: 16:23:08

Comments:

Number of Pages: 4

(including cover sheet)

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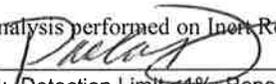
PLM Bulk Asbestos Report

STech Consulting LLC
Attn: Sean Tillema
484B Washington Street, #401
Monterey, CA 93940

Date Received 03/15/18 **AmeriSci Job #** 918031368
Date Examined 03/16/18 **P.O. #**
Page 1 of 1
RE: 18040; Spreckels Memorial District; 90 Fifth St. Spreckels, CA

Client No. / HGA	Lab No.	Asbestos Present	Total % Asbestos
040-1 Location: Plaster - Hallway - Drinking Fountain	918031368-01	Yes	Trace (<0.1 % pc) ¹ (by 1000 pt ct) by Paola Ducoing on 03/16/18 Analyst Description: White, Homogeneous, Non-Fibrous, Cementitious, Plaster Asbestos Types: Chrysotile <0.1 % pc Other Material: Non-Asbestos/Inert 45.9 % Comment: Heat Sensitive (organic): 9.7%; Acid Soluble (inorganic): 44.4%; Inert (Non-asbestos): 45.9%
040-4 Location: Plaster - Women's Restroom	918031368-02	Yes	Trace (<0.1 % pc) ¹ (by 1000 pt ct) by Paola Ducoing on 03/16/18 Analyst Description: White, Heterogeneous, Non-Fibrous, Cementitious, Plaster Asbestos Types: Chrysotile <0.1 % pc Other Material: Non-Asbestos/Inert 14.2 % Comment: Heat Sensitive (organic): 16.8%; Acid Soluble (inorganic): 69.0%; Inert (Non-asbestos): 14.2%
040-6 Location: Plaster - Men's Restroom	918031368-03	Yes	Trace (<0.1 % pc) ¹ (by 1000 pt ct) by Paola Ducoing on 03/16/18 Analyst Description: White, Heterogeneous, Non-Fibrous, Cementitious, Plaster Asbestos Types: Chrysotile <0.1 % pc Other Material: Non-Asbestos/Inert 14.7 % Comment: Heat Sensitive (organic): 16.7%; Acid Soluble (inorganic): 68.6%; Inert (Non-asbestos): 14.7%

Reporting Notes:

(1) 1000 Point Count Analysis performed on Inert Residue remaining after 480C heat and HCl acid treatments
Analyzed By: Paola Ducoing ; Date Analyzed: 3/16/2018 3/16/18
*NAD = no asbestos detected; Detection Limit <1%; Reporting Limits: CVES = 1%, 400 Pt Ct = 0.25%, 1000 Pt Ct = 0.1%; NA = not analyzed; NA/PS = not analyzed / positive stop; NVA = No Visible Asbestos; PLM (polarized light microscopy) Bulk Asbestos Analysis by EPA 600/R-93/116, including requirements for EPA 600/M4-82-020 per 40 CFR 763 (NVLAP Lab #200346-0, CA ELAP lab #2322); Note: PLM is not consistently reliable in detecting asbestos in floor coverings and similar NOB materials. TEM is currently the only method that can be used to determine if this material can be considered or treated as non-asbestos-containing in New York State (also see EPA Advisory for floor tile, FR 59, 146, 38970, 8/1/94). NIST Accreditation requirements mandate that this report must not be reproduced except in full with the approval of the laboratory. This PLM report relates ONLY to the items tested.

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