

# **Supporting Document 1**

**LIMITED ASBESTOS CONTAINING MATERIAL  
INSPECTION AND ASSESSMENT: 3131 SOUTH  
VIRGINIA STREET, RENO, NEVADA CONDUCTED  
MARCH 17/APRIL 17, 2023**



# C & G Environmental Consulting, Inc.

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April 23, 2023  
C&G Environmental Project No. SSC01031723CO

Vagabond Inn  
3131 S. Virginia Street  
Reno, NV 89502

**RE: LIMITED ASBESTOS CONTAINING MATERIAL INSPECTION AND ASSESSMENT: 3131 SOUTH VIRGINIA STREET, RENO, NEVADA**

C&G Environmental Consulting is pleased to submit this report that summarizes the results of a limited asbestos containing materials (ACM) inspection and assessment at the Vagabond Inn which is located at 3131 S. Virginia Street, in Reno, Nevada.

## **1.0 SCOPE OF SERVICES**

On March 17 & April 17, 2023, EPA accredited, and State of Nevada licensed asbestos inspectors from C&G Environmental Consulting conducted a limited inspection and assessment of suspect building materials that were going to be disturbed during an upcoming renovation project in the above referenced commercial building.

A total of thirty-two (32) representative bulk samples were collected and analyzed of materials identified to have the potential to contain asbestos.

Suspect materials that were sampled during this inspection included; acoustic ceiling texture, drywall, drywall joint compound, drywall texture, wallpaper, carpet mastic, floor tile grout with mortar, wall tile mortar, fiberboard, and concrete.

This inspection was conducted in accordance with accepted EPA and OSHA regulations. The samples were submitted under approved chain-of-custody protocol, and analyzed at Aerobiology Laboratory Associates, Inc., in Huntington Beach, California. The suspect ACM samples were analyzed for asbestos fibers utilizing Polarized Light Microscopy (PLM). The laboratory analytical reports are attached in Appendix A, and the chain of custody records are provided in Appendix B. Approximate bulk sample locations are depicted in Figure 1 (attached).

## 2.0 ASBESTOS ANALYTICAL RESULTS

In accordance with OSHA 29 CFR 1926.1101 and NESHAPS 40 CFR 61.141 the definition of an asbestos containing material is “any material which contains more than one percent asbestos by weight”.

Analytical results indicated that acoustic ceiling texture, wall texture, and joint compound materials were positive for containing greater than 1% Chrysotile asbestos in the manager’s apartment area of the building. No ACM was identified in samples collected from the front desk/lobby area.

Additionally, analytical results indicated that three bulk samples of drywall joint compound materials located in rooms 157, 161, and 162 were identified to contain less than one percent asbestos by standard PLM analysis. All other bulk samples collected during this investigation were “None Detected” for containing asbestos.

These sample results are limited to the materials that were identified and sampled during this inspection. If additional materials are discovered that have not been sampled, they would require additional sampling and analysis.

## 3.0 CONCLUSIONS/RECOMMENDATIONS

### **Materials Identified to Contain Greater than 1% Asbestos**

As a result of conducting this limited asbestos inspection; **friable** acoustic ceiling texture and drywall texture materials were identified to contain greater than one percent asbestos in the manager’s apartment area of this commercial building.

Therefore, in the event these materials will be disturbed as a result of a demolition or renovation project, C&G Environmental Consulting recommends that the following procedures are acknowledged in order to maintain regulatory compliance and reduce liability and health concerns:

- A certified asbestos abatement contractor licensed in the State of Nevada should be contracted to perform all activities involving the removal or disturbance of materials which contain asbestos. All abatement work should be done in strict accordance with applicable Federal, State and local regulations.
- Mandatory notification to State of Nevada OSHA and the Washoe County Health Department – Air Quality Management Division (WCHD-AQMD), which regulate the removal of asbestos **is required** prior to the removal/disturbance of the acoustic ceiling texture/wall texture materials.
- All waste must be disposed of at a landfill facility that is licensed to accept friable asbestos waste.

- A certified asbestos consultant licensed in the State of Nevada must be contracted to conduct final clearance air monitoring after asbestos abatement is complete.

### **Materials Identified to Contain Less than 1% Asbestos**

The EPA and Washoe County Health Department – Air Quality Management Division (WCHD-AQMD) do not regulate materials that contain <1% asbestos, however the NESHAPS regulation **does** require a point count analysis be performed on any analytical results that indicate a quantity of <1% asbestos in order to ensure the accuracy of the PLM result. Consequently, samples 162-W-29,161-W-30,157-W-31, underwent a 400 point count analysis. Analytical results from performing the 400 point count analysis indicated that all samples were confirmed to contain <1% asbestos. Laboratory analytical results from the point count analysis are provided in Appendix C.

As indicated above, the EPA and WCHD-AQMD **do not** regulate materials that contain <1% asbestos. **However**, federal OSHA regulation CFR 1926.1101 does contain specific requirements and prohibitions for materials that contain any detectable amounts of asbestos (up to 1% asbestos). Consequently, State of Nevada OSHA also recognizes and enforces these federal OSHA requirements and prohibitions for materials that contain <1% asbestos.

Therefore, in the event the drywall joint compound materials that were identified to contain <1% in rooms 157, 161, & 162 will be disturbed as a result of a demolition/renovation project, C&G Environmental Consulting recommends that the following procedures are acknowledged in order to maintain regulatory compliance and reduce liability and health concerns:

- The use of a certified asbestos abatement contractor licensed in the State of Nevada **is not** mandatory or required to remove or disturb materials that contain <1% asbestos. **However**, if a certified asbestos abatement contractor is not used, the following requirements must be adhered to in order to remain in compliance with federal OSHA regulation 1926.1101, and State of Nevada OSHA:
  - Employer/building owner must provide asbestos training of at least 16 hours (O&M training equivalent) to any employee involved with the removal or disturbance of materials that contain <1% asbestos;
  - The use of wet methods, or wetting agents, to control employee exposures during asbestos handling, mixing, removal, cutting, application, and cleanup, except where employers demonstrate that the use of wet methods is infeasible;
  - Prompt clean-up and disposal of wastes and debris contaminated with asbestos into leak-tight containers;
  - Employer/building owner shall ensure that a "competent person" conducts an exposure assessment immediately before or at the initiation of the operation to ascertain expected exposures during that operation or workplace. The assessment must be completed in time to comply with

requirements which are triggered by exposure data or the lack of a "negative exposure assessment," and to provide information necessary to assure that all control systems planned are appropriate for that operation and will work properly;

- Employer/building owner shall provide employees with appropriate respirators, and all employees shall pass a medical screening to wear a respirator and be fit-tested to wear the respirator prior to the commencement of the exposure assessment. All respirator usage shall be performed in compliance with the OSHA respirator standard 1910.134;
- The employer/building owner shall provide affected employees and their designated representatives an opportunity to observe any monitoring of employee exposure to asbestos;
- The employer/building owner shall notify affected employees of the monitoring results that represent that employee's exposure as soon as possible following receipt of monitoring results;
- The employer/building owner shall notify affected employees of the results of monitoring representing the employee's exposure in writing either individually or by posting at a centrally located place that is accessible to affected employees;
- The employer/building owner must establish an asbestos regulated area if the employer has a situation where airborne concentrations of asbestos exceed or there is a reasonable possibility they may exceed either of the asbestos permissible exposure levels (PELs). If the employer does not have that situation, then the employer is not required to establish an asbestos regulated area.

C&G Environmental Consulting recommends that the following prohibitions are acknowledged in order to maintain regulatory compliance and reduce liability and health concerns:

- The use of high-speed abrasive disc saws that are not equipped with point of cut ventilator or enclosures with HEPA filtered exhaust air;
- The use of compressed air used to remove asbestos, or materials containing asbestos, unless the compressed air is used in conjunction with an enclosed ventilation system designed to capture the dust cloud created by the compressed air;
- The use of employee rotation as a means of reducing employee exposure to asbestos.

In the event the employees' asbestos exposures exceed either asbestos PEL (8 hour time-weighted average or excursion level), then all of the standard's relevant general work practice control procedures, engineering control methods, and prohibitions that are not directed specifically at ACM will apply to the removal of the <1% asbestos project.

**Due to extensive list of federal OSHA requirements and prohibitions for the removal/disturbance of materials that contain <1% asbestos, and the decision by State of Nevada OSHA to enforce these federal regulations, most employers/building**

owners choose to hire a State of Nevada asbestos abatement contractor to perform the work. The asbestos abatement contractor would not be required to file a 10-day notification to State of Nevada OSHA since the materials are not considered to be ACM (>1%). Additionally, final clearance air sampling assessments are recommended (not mandatory) since the materials are not considered to be ACM (>1%).

#### 4.0 LIMITATIONS

C&G Environmental Consulting is not responsible for any claims or damages associated with the interpretation of information provided during this inspection. This report should not be regarded as a guarantee that no further asbestos exists beyond that which was suspected and sampled during this inspection. In addition, asbestos is usually not distributed evenly throughout a particular material and C&G Environmental Consulting cannot guarantee that all materials sampled are exactly as represented throughout the entire building. In the event renovation or demolition activities uncover materials that were previously hidden or inaccessible during the time of this inspection, then additional sample collection and analysis would be required. In the event asbestos containing materials that were previously hidden or inaccessible during the time of this inspection are disturbed and an asbestos exposure occurs, C&G Environmental Consulting shall be held harmless and will not be responsible for any claims made, financial or otherwise.

C&G Environmental Consulting makes no warranties or guarantees as to the accuracy or completeness of information obtained from, provided by, or compiled by others. It is possible that information exists beyond the scope of this investigation. This report is not a legal opinion. The services performed by C&G Environmental Consulting have been conducted in a manner consistent with the level of care ordinarily exercised by members of our profession currently licensed by the State of Nevada to perform this work, and practicing under similar conditions. No other warranty, expressed or implied, is made.

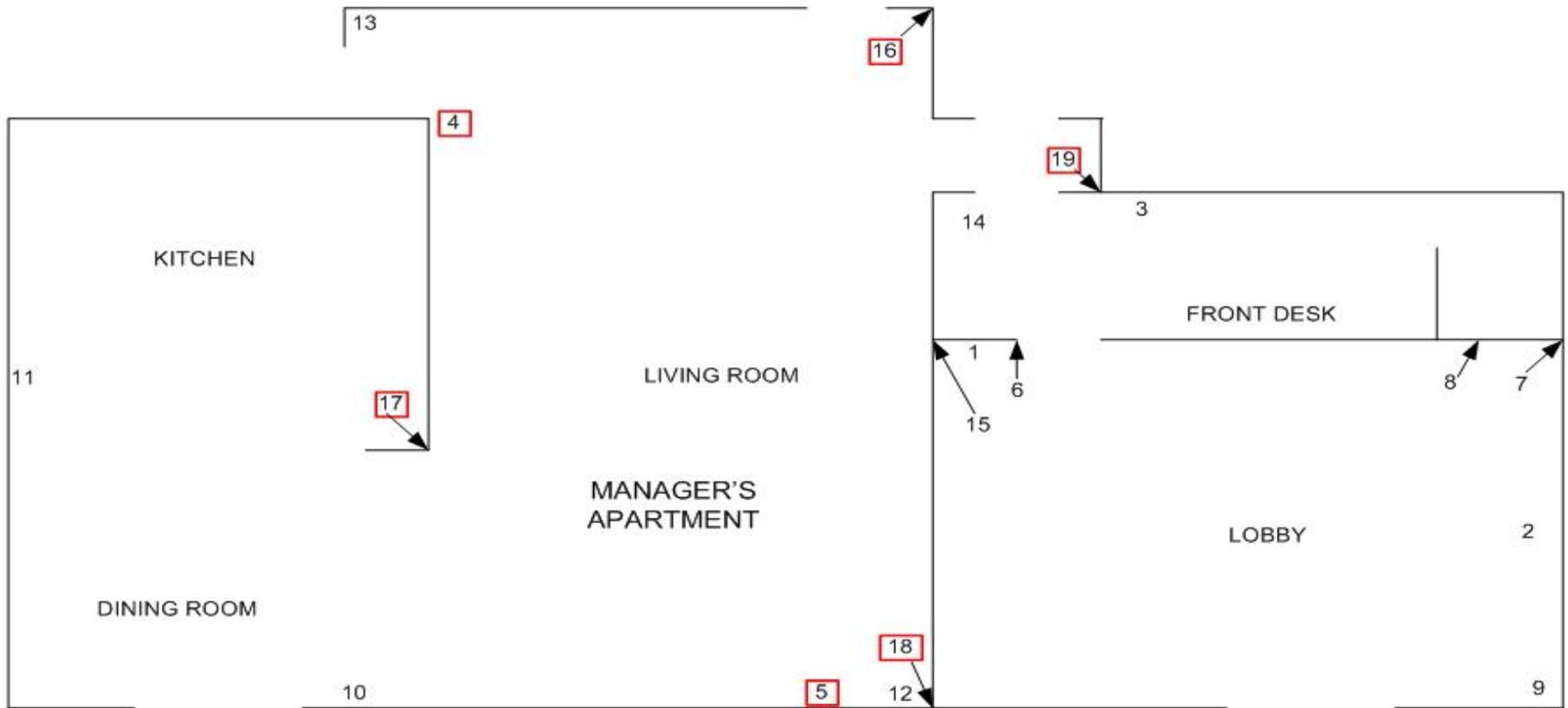
#### 5.0 CLOSURE

We appreciated the opportunity to provide this service for the Vagabond Inn. Should you have any questions regarding the contents of this report, or need additional information, please contact us at your convenience.

Respectfully Submitted,  
C&G ENVIRONMENTAL CONSULTING, INC.



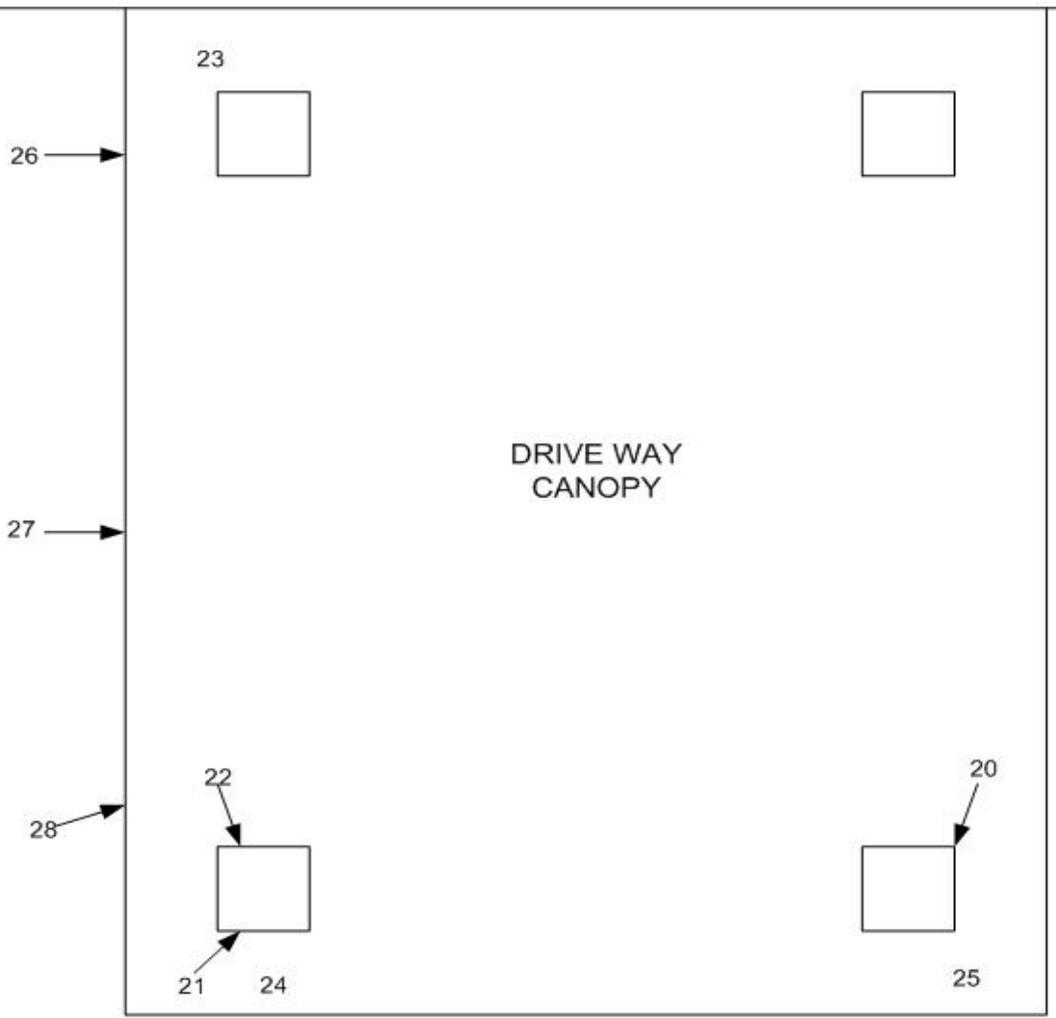
Gene E. Johnson  
Certified Nevada Asbestos Consultant  
License No. IJPM0604



- Denotes Location of Asbestos Containing Sample

  
 N  
 (Not To Scale)

<b>C&amp;G Environmental Consulting, Inc.</b>			
Figure 1 Approximate Locations of Bulk Samples 3131 S. Virginia Street, Reno			
Proj. No. SSC01031723CC	Client: Vagabond Inn	Date: 4-23-23	By: G. Johnson

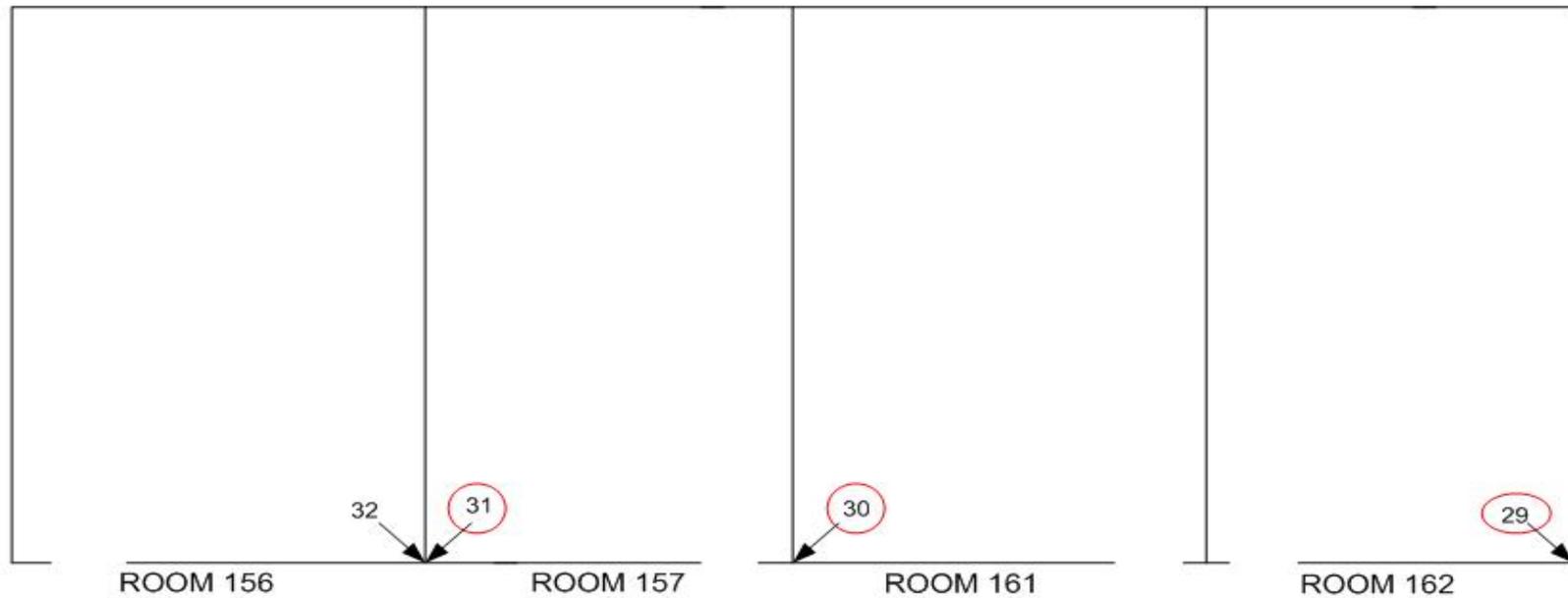


  
 N  
 (Not To Scale)

**C&G Environmental  
Consulting, Inc.**

**Figure 2**  
 Approximate Location of Bulk Samples  
 3131 S. Virginia Street, Reno

Project No.:	Client:	Date:	By:
SSC01031723CO	Vagabond Inn	4-23-23	G. Johnson



 - Denotes Location of <1% Asbestos Containing Sample

  
(Not To Scale)

<b>C&amp;G Environmental Consulting, Inc.</b>			
Figure 3 Approximate Locations of Bulk Samples 3131 S. Virginia Street, Reno			
Proj. No. SSC01031723CC	Client: Vagabond Inn	Date: 4-23-23	By: G. Johnson

**APPENDIX A**  
**Laboratory Analytical Results**

**Certificate of Analysis**

Client Name: C&G Environmental Consulting, Inc.  
 Street address: P.O. Box 19476  
 City, State ZIP: Reno, NV 89511  
 Attn: Gene E. Johnson  
 Client Project Name: 3131 South Virginia Street, Reno / SSC0103172



Date Collected: 03/18/23  
 Date Received: 03/20/23  
 Date Analyzed: 03/27/23  
 Date Reported: 03/27/23  
 Project ID: 23010470

Test Requested: **3002, Asbestos in Bulk Samples**  
 Method: Polarized Light Microscopy / Dispersion Staining (PLM), Method for the Determination of Asbestos in Bulk Building Materials. EPA-600/R-93/116, July 1993.

Sample Identification		Physical Description of Sample/Layer	Homo- geneous (Y/N)	Layer Percentage	Asbestos Detected (%)	Non-Asbestos Fibers (%)	Non-Fibrous Material	Matrix Material
Client	Lab Sample Number							
AC-1	23010470-001	White Acoustic Ceiling Texture	Y	100%	ND		100	C, Other
AC-2	23010470-002	White Acoustic Ceiling Texture	Y	100%	ND		100	C, Other
AC-3	23010470-003	White Acoustic Ceiling Texture	Y	60%	ND		100	C, Other
AC-3	23010470-003	White Joint Compound	Y	20%	ND		100	C
AC-3	23010470-003	White Drywall	Y	20%	ND	5 CELL	95	G
AC-4	23010470-004	White Acoustic Ceiling Texture	Y	60%	CHRY 4%		96	C, Other
AC-4	23010470-004	White Joint Compound	Y	20%	CHRY 2%		98	C
AC-4	23010470-004	White Drywall	Y	20%	ND	5 CELL	95	G
AC-5	23010470-005	White Acoustic Ceiling Texture	Y	60%	CHRY 4%		96	C, Other
AC-5	23010470-005	White Joint Compound	Y	20%	CHRY 2%		98	C

*Sandar Hein*  
 Sandar Hein  
 Laboratory Analyst

*Miguel Ines*  
 Miguel Ines  
 Asbestos Laboratory Supervisor

A = Amosite  
 AC = Actinolite  
 AN = Anthophyllite  
 CHRY = Chrysotile  
 CR = Crocidolite  
 TR = Tremolite  
 Trace = Less Than 1%  
 ND = None Detected

Q = Quartz  
 C = Carbonates  
 G = Gypsum  
 M = Mica  
 T = Tar  
 NTR = Non-Asbestiform TR  
 NAC = Non-Asbestiform AC

P = Perlite  
 B = Binder  
 D = Diatoms

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NVLAP Lab Code 201076-0

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Sample Identification		Physical Description of Sample/Layer	Homo- geneous (Y/N)	Layer Percentage	Asbestos Detected	Non-Asbestos Fibers (%)	Non-Fibrous Material	Matrix Material
Client	Lab Sample Number							
AC-5	23010470-005	White Drywall	Y	20%	ND	5 CELL	95	G
WTM-6	23010470-006	White Wall Tile Mortar	Y	100%	ND		100	C, Q
WTM-7	23010470-007	White Wall Tile Mortar	Y	100%	ND		100	C, Q
WTM-8	23010470-008	White Wall Tile Mortar	Y	100%	ND		100	C, Q
FTG-9	23010470-009	Brown Floor Tile Grout	Y	50%	ND		100	C, Q
FTG-9	23010470-009	White Floor Tile Mortar	Y	50%	ND		100	C, Q
FTG-10	23010470-010	Brown Floor Tile Grout	Y	60%	ND		100	C, Q
FTG-10	23010470-010	Gray Floor Tile Mortar	Y	40%	ND		100	C, Q
FTG-11	23010470-011	Brown Floor Tile Grout	Y	50%	ND		100	C, Q
FTG-11	23010470-011	Gray Floor Tile Mortar	Y	50%	ND		100	C, Q

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Sample Identification		Physical Description of Sample/Layer	Homo- geneous (Y/N)	Layer Percentage	Asbestos Detected	Non-Asbestos Fibers (%)	Non-Fibrous Material	Matrix Material
Client	Lab Sample Number							
CM-12	23010470-012	Yellow Carpet Mastic	Y	100%	ND	2 SYN, 2 CELL	96	B
CM-13	23010470-013	Yellow Carpet Mastic	Y	100%	ND	2 SYN, 2 CELL	96	B
CM-14	23010470-014	Yellow Carpet Mastic	Y	100%	ND	2 SYN, 2 CELL	96	B
W-15	23010470-015	White Texture	Y	20%	ND		100	C
W-15	23010470-015	White Joint Compound	Y	20%	ND		100	C
W-15	23010470-015	White Drywall	Y	60%	ND	5 CELL	95	G
W-16	23010470-016	White Texture	Y	20%	CHRY 2%		98	C
W-16	23010470-016	White Joint Compound	Y	20%	CHRY 2%		98	C
W-16	23010470-016	White Drywall	Y	60%	ND	5 CELL	95	G
W-17	23010470-017	White Texture	Y	20%	CHRY <1%		100	C

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Sample Identification		Physical Description of Sample/Layer	Homo- geneous (Y/N)	Layer Percentage	Asbestos Detected	Non-Asbestos Fibers (%)	Non-Fibrous Material	Matrix Material
Client	Lab Sample Number							
W-17	23010470-017	White Joint Compound	Y	20%	CHRY <1%		100	C
W-17	23010470-017	White Drywall	Y	60%	ND	5 CELL	95	G
W-18	23010470-018	White Texture	Y	20%	CHRY 2%		98	C
W-18	23010470-018	White Joint Compound	Y	20%	CHRY 2%		98	C
W-18	23010470-018	White Drywall	Y	60%	ND	5 CELL	95	G
W-19	23010470-019	White Texture	Y	20%	CHRY 2%		98	C
W-19	23010470-019	White Joint Compound	Y	20%	CHRY 2%		98	C
W-19	23010470-019	White Drywall	Y	60%	ND	5 CELL	95	G
CONC-20	23010470-020	Gray Concrete	Y	100%	ND		100	C, Q
CONC-21	23010470-021	Gray Concrete	Y	70%	ND		100	C, Q

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Client	Lab Sample Number							
CONC-21	23010470-021	White Cementitious Material	Y	30%	ND	2 CELL	98	G
CONC-22	23010470-022	Gray Concrete	Y	100%	ND		100	C, Q
RM-23	23010470-023	Black/White Coating Sheet	Y	20%	ND	20 SYN	80	B, Other
RM-23	23010470-023	Black Roofing Tar	Y	15%	ND	10 CELL	90	T
RM-23	23010470-023	Off-White Coating	Y	15%	ND		100	Other
RM-23	23010470-023	Black Tar Felt 1	Y	30%	ND	50 SYN	50	T
RM-23	23010470-023	Black Tar Felt 2	Y	20%	ND	50 FBG	50	T
RM-24	23010470-024	Black/White Coating Sheet	Y	20%	ND	20 SYN	80	B, Other
RM-24	23010470-024	Black Roofing Tar	Y	15%	ND	10 CELL	90	T
RM-24	23010470-024	Off-White Coating	Y	15%	ND		100	Other

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Client	Lab Sample Number							
RM-24	23010470-024	Black Tar Felt 1	Y	30%	ND	50 SYN	50	T
RM-24	23010470-024	Black Tar Felt 2	Y	20%	ND	50 FBG	50	T
RM-25	23010470-025	Black/White Coating Sheet	Y	20%	ND	20 SYN	80	B, Other
RM-25	23010470-025	Black Roofing Tar	Y	15%	ND	10 CELL	90	T
RM-25	23010470-025	Off-White Coating	Y	15%	ND		100	Other
RM-25	23010470-025	Black Tar Felt 1	Y	30%	ND	50 SYN	50	T
RM-25	23010470-025	Black Tar Felt 2	Y	20%	ND	50 FBG	50	T
FB-26	23010470-026	White/Brown Fiberboard	Y	100%	ND	90 CELL	10	Other
FB-27	23010470-027	White/Brown Fiberboard	Y	100%	ND	90 CELL	10	Other
FB-28	23010470-028	White/Brown Fiberboard	Y	100%	ND	90 CELL	10	Other

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### General Notes

- ◆ **ND** indicates no asbestos was detected; the method detection limit is 1 %.
- ◆ **Trace** or "<1" indicates asbestos was identified in the sample, but the concentration is less than 1%.
- ◆ All regulated asbestos minerals (i.e. chrysotile, amosite, crocidolite, anthophyllite, tremolite, and actinolite) were sought in every layer of each sample, but only those asbestos minerals detected are listed. Amosite is the common name for the asbestiform variety of the minerals cummingtonite and grunerite. Crocidolite is the common name used for the asbestiform variety of the mineral riebeckite.
- ◆ Tile, vinyl, foam, plastic, and fine powder samples may contain asbestos fibers of such small diameter (< 0.25 microns in diameter) that these fibers cannot be detected by PLM. For such samples, more sensitive analytical methods (e.g. TEM, SEM, and XRD) are recommended if greater certainty about asbestos content is required. Semi-quantitative bulk TEM floor tile analysis is accepted under NESHAP regulations.
- ◆ These results are submitted pursuant to Aerobiology Laboratory Associates, Inc.'s current terms and conditions of sale, including the company's standard warranty and limitation of liability provisions. No responsibility or liability is assumed for the manner in which the results are used or interpreted.
- ◆ Unless notified in writing to return the samples covered by this report, Aerobiology Laboratory Associates, Inc. will store the samples for a minimum period of thirty (30) days before discarding. A shipping and handling charge will be assessed for the return of any samples.
- ◆ Aerobiology does not guarantee the results of tape lifts, microvacs, wipe, and/or debris samples. Accurate analysis cannot be performed due to particle size, media used, and/or amount of material given. Analysis of these materials should be preformed by a TEM. ***A result of ND does not indicate that the sample area does not contain asbestos. It means the analyst could not identify asbestos in the specific sample for the reasons listed above.***

### Notes Required by NVLAP

- ◆ This report must not be used by the client to claim product certification, approval, or endorsement by NVLAP, NIST, or any agency of the Federal Government.
- ◆ This test report relates only to the items tested or calibrated.
- ◆ This report is not valid unless it bears the name of a NVLAP-approved signatory.
- ◆ Any reproduction of this document must include the entire document in order for the report to be valid.

**Certificate of Analysis**

Client Name: C&G Environmental Consulting, Inc.  
 Street address: P.O. Box 19476  
 City, State ZIP: Reno, NV 89511  
 Attn: Gene E. Johnson  
 Client Project Name: 3131 South Virginia Street, Reno / SSC01031723CO



Date Collected: 04/17/23  
 Date Received: 04/18/23  
 Date Analyzed: 04/19/23  
 Date Reported: 04/19/23  
 Project ID: 23014661

Test Requested: **3002, Asbestos in Bulk Samples**  
 Method: Polarized Light Microscopy / Dispersion Staining (PLM), Method for the Determination of Asbestos in Bulk Building Materials. EPA-600/R-93/116, July 1993.

Sample Identification		Physical Description of Sample/Layer	Homo- geneous (Y/N)	Layer Percentage	Asbestos Detected	Non-Asbestos Fibers Percentage	Non-Fibrous Percentage	Matrix Material
Client	Lab Sample Number							
162-W-29	23014661-001-1	White Wallpaper	Y	30	ND	50 SYN	50	B, Other
	23014661-001-2	White Joint Compound	Y	30	CHRY <1%		100	C
	23014661-001-3	White Drywall	Y	40	ND	5 CELL, 2 FBG	93	G
161-W-30	23014661-002-1	White Wallpaper	Y	30	ND	50 SYN	50	B, Other
	23014661-002-2	White Joint Compound	Y	30	CHRY <1%		100	C
	23014661-002-3	White Drywall	Y	40	ND	5 CELL, 2 FBG	93	G
157-W-31	23014661-003-1	White Wallpaper	Y	30	ND	50 SYN	50	B, Other
	23014661-003-2	White Joint Compound	Y	30	CHRY <1%		100	C
	23014661-003-3	White Drywall	Y	40	ND	5 CELL, 2 FBG	93	G
156-W-32	23014661-004-1	Beige Wallpaper	Y	20	ND	50 SYN	50	B, Other

*Sandar Hein*  
 Sandar Hein  
 Asbestos Analyst

*Miguel Ines*  
 Miguel Ines  
 Asbestos Laboratory Supervisor

- |                  |                        |              |
|------------------|------------------------|--------------|
| A Amosite        | CELL Cellulose         | O Quartz     |
| AC Actinolite    | MW Mineral Wool        | C Carbonates |
| AN Anthophyllite | FBG Fiberglass         | G Gypsum     |
| CHRY Chrysotile  | SYN Synthetic          | M Mica       |
| CR Crocidolite   | WO Wollastonite        | T Tar        |
| TR Tremolite     | FT Fibrous Talc        | P Perlite    |
| <1% Less Than 1% | AH Animal Hair         | B Binder     |
| ND None Detected | NAC Non-Asbestiform AC | D Diatoms    |
|                  | NTR Non-Asbestiform TR |              |

**Certificate of Analysis**

Client Name: C&G Environmental Consulting, Inc.  
 Street address: P.O. Box 19476  
 City, State ZIP: Reno, NV 89511  
 Attn: Gene E. Johnson  
 Client Project Name: 3131 South Virginia Street, Reno / SSC01031723CO



Date Collected: 04/17/23  
 Date Received: 04/18/23  
 Date Analyzed: 04/19/23  
 Date Reported: 04/19/23  
 Project ID: 23014661

Test Requested: **3002, Asbestos in Bulk Samples**  
 Method: Polarized Light Microscopy / Dispersion Staining (PLM), Method for the Determination of Asbestos in Bulk Building Materials. EPA-600/R-93/116, July 1993.

Sample Identification		Physical Description of Sample/Layer	Homo- geneous (Y/N)	Layer Percentage	Asbestos Detected	Non-Asbestos Fibers Percentage	Non-Fibrous Percentage	Matrix Material
Client	Lab Sample Number							
156-W-32	23014661-004-2	White Joint Compound 1	Y	20	ND		100	C
	23014661-004-3	White Joint Compound 2	Y	20	ND		100	C
	23014661-004-4	White Drywall	Y	40	ND	5 CELL, 2 FBG	93	G

*Sandar Hein*  
 Sandar Hein  
 Asbestos Analyst

*Miguel Ines*  
 Miguel Ines  
 Asbestos Laboratory Supervisor

- |      |               |      |                    |   |            |
|------|---------------|------|--------------------|---|------------|
| A    | Amosite       | CELL | Cellulose          | Q | Quartz     |
| AC   | Actinolite    | MW   | Mineral Wool       | C | Carbonates |
| AN   | Anthophyllite | FBG  | Fiberglass         | G | Gypsum     |
| CHRY | Chrysotile    | SYN  | Synthetic          | M | Mica       |
| CR   | Crocidolite   | WO   | Wollastonite       | T | Tar        |
| TR   | Tremolite     | FT   | Fibrous Talc       | P | Perlite    |
| <1%  | Less Than 1%  | AH   | Animal Hair        | B | Binder     |
| ND   | None Detected | NAC  | Non-Asbestiform AC | D | Diatoms    |
|      |               | NTR  | Non-Asbestiform TR |   |            |

C&G Environmental Consulting, Inc.

P.O. Box 19476

Reno, NV 89511

Gene E. Johnson

**Client Project Name:** 3131 South Virginia Street, Reno / SSC01031723CO



NVLAP Lab Code 201076-0

Date Collected: 04/17/23

Date Received: 04/18/23

Date Analyzed: 04/19/23

Date Reported: 04/19/23

Project ID: 23014661

### General Notes

- ◆ **ND** indicates no asbestos was detected; the method detection limit is 1 %.
- ◆ **Trace** or "<1" indicates asbestos was identified in the sample, but the concentration is less than 1%.
- ◆ All regulated asbestos minerals (i.e. chrysotile, amosite, crocidolite, anthophyllite, tremolite, and actinolite) were sought in every layer of each sample, but only those asbestos minerals detected are listed. Amosite is the common name for the asbestiform variety of the minerals cummingtonite and grunerite. Crocidolite is the common name used for the asbestiform variety of the mineral riebeckite.
- ◆ Tile, vinyl, foam, plastic, and fine powder samples may contain asbestos fibers of such small diameter (< 0.25 microns in diameter) that these fibers cannot be detected by PLM. For such samples, more sensitive analytical methods (e.g. TEM, SEM, and XRD) are recommended if greater certainty about asbestos content is required. Semi-quantitative bulk TEM floor tile analysis is accepted under NESHAP regulations.
- ◆ These results are submitted pursuant to Aerobiology Laboratory Associates, Inc.'s current terms and conditions of sale, including the company's standard warranty and limitation of liability provisions. No responsibility or liability is assumed for the manner in which the results are used or interpreted.
- ◆ Unless notified in writing to return the samples covered by this report, Aerobiology Laboratory Associates, Inc. will store the samples for a minimum period of thirty (30) days before discarding. A shipping and handling charge will be assessed for the return of any samples.
- ◆ Aerobiology does not guarantee the results of tape lifts, microvacs, wipe, and/or debris samples. Accurate analysis cannot be performed due to particle size, media used, and/or amount of material given. Analysis of these materials should be preformed by a TEM. ***A result of ND does not indicate that the sample area does not contain asbestos. It means the analyst could not identify asbestos in the specific sample for the reasons listed above.***

### Notes Required by NVLAP

- ◆ This report must not be used by the client to claim product certification, approval, or endorsement by NVLAP, NIST, or any agency of the Federal Government.
- ◆ This test report relates only to the items tested or calibrated.
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- ◆ Any reproduction of this document must include the entire document in order for the report to be valid.

**APPENDIX B**  
**Chain of Custody Records**

# C&G ENVIRONMENTAL CONSULTING, INC 23010470

P.O. Box 19476      Reno, NV 89511      Ph: (775) 746-3838      Fax: (775) 787-6846      **PAGE 1 OF 2**

## \*\*\* BULK SAMPLE SUBMISSION FORM / CHAIN-OF-CUSTODY REPORT \*\*\*

Analysis Type: PLM      Point Count      TEM      Lead      **5 DAY TAT**

Turnaround:               RUSH               STANDARD

Job Site: 3131 SOUTH VIRGINIA STREET, RENO      Job No: SSC01031723CO

P.O. # :                                       Contact person:   

### STANDING ORDER – ONLY ANALYZE MATERIALS LISTED IN “DESCRIPTION” SECTION OF COC

Sample number	Location	Description
AC-1	SEE FLOOR PLAN	ACOUSTIC CEILING TEXTURE
AC-2		ACOUSTIC CEILING TEXTURE
AC-3		ACOUSTIC CEILING TEXTURE/JOINT COMP/DW
AC-4		ACOUSTIC CEILING TEXTURE/JOINT COMP/DW
AC-5		ACOUSTIC CEILING TEXTURE/JOINT COMP/DW
WTM-6		WALL TILE MORTAR
WTM-7		WALL TILE MORTAR
WTM-8		WALL TILE MORTAR
FTG-9		FLOOR TILE GROUT/MORTAR
FTG-10		FLOOR TILE GROUT/MORTAR
FTG-11		FLOOR TILE GROUT/MORTAR
CM-12		CARPET MASTIC
CM-13		CARPET MASTIC
CM-14		CARPET MASTIC
W-15	6	TEXTURE/JOINT COMPOUND/DRYWALL
W-16		TEXTURE/JOINT COMPOUND/DRYWALL
W-17		TEXTURE/JOINT COMPOUND/DRYWALL
W-18		TEXTURE/JOINT COMPOUND/DRYWALL
W-19		TEXTURE/JOINT COMPOUND/DRYWALL
CONC-20	↓	CONCRETE

Special Instructions: \_\_\_\_\_

Relinquished By	Date / Time	Received By	Date / Time
Name/Company <i>Geny E. Johnson/C&amp;G Enr. Conslt.</i>	<b>3-18-23</b>	Name/Company <i>CO</i>	<i>3/20/23</i>
Signature <i>Geny E. Johnson</i>	<b>3:00PM</b>	Signature <i>CO</i>	<i>9:45 am</i>
Name/Company		Name/Company	
Signature		Signature	

Send Original to Lab - Keep Yellow Copy





**APPENDIX C**  
**POINT COUNT ANALYSIS RESULTS**

**Certificate of Analysis**

Client Name: C&G Environmental Consulting, Inc.  
 Street address: P.O. Box 19476  
 City, State ZIP: Reno, NV 89511  
 Attn: Gene E. Johnson  
 Client Project Name: 3131 South Virginia Street, Reno / SSC01031723CO



Date Collected: 04/17/23  
 Date Received: 04/18/23  
 Date Analyzed: 04/26/23  
 Date Reported: 04/26/23  
 Project ID: 23014661  
 Job ID: POINT COUNT

Test Requested: **3001, Asbestos Point Count in Bulk Samples (400)**  
 Method: Polarized Light Microscopy / Dispersion Staining (PLM), Method for the Determination of Asbestos in Bulk Building Materials. EPA-600/R-93/116, July 1993.

Sample Identification		Physical Description of Sample/Layer	Asbestos Detected	Asbestos Percentage	Point Count Method (400/1000)
Client	Lab Sample Number				
162-W-29	23014661-001-2	White Joint Compound	CHRY*	<0.25%	400
161-W-30	23014661-002-2	White Joint Compound	CHRY	0.25%	400
157-W-31	23014661-003-2	White Joint Compound	CHRY	0.25%	400

\*Asbestos fibers found, but no positive points counted.

*Sandar Hein*  
 Sandar Hein  
 Asbestos Analyst

*Miguel Ines*  
 Miguel Ines  
 Asbestos Laboratory Supervisor

- A Amosite
- AC Actinolite
- AN Anthophyllite
- CHRY Chrysotile
- CR Crocidolite
- TR Tremolite
- ND None Detected

### Certificate of Analysis

C&G Environmental Consulting, Inc.  
P.O. Box 19476  
Reno, NV 89511  
Gene E. Johnson

**Client Project Name:** 3131 South Virginia Street, Reno / SSC01031723CO



**NVLAP Lab Code 201076-0**

Date Collected: 04/17/23  
Date Received: 04/18/23  
Date Analyzed: 04/26/23  
Date Reported: 04/26/23  
Project ID: 23014661  
Job ID: POINT COUNT

#### General Notes

- ◆ **Negative** indicates no asbestos was detected; the method detection limit is 1%.
- ◆ **Trace** or "<1" indicates asbestos was identified in the sample, but the concentration is less than the method detection limit of 1%.
- ◆ All regulated asbestos minerals (i.e. chrysotile, amosite, crocidolite, anthophyllite, tremolite, and actinolite) were sought in every layer of each sample, but only those asbestos minerals detected are listed. Amosite is the common name for the asbestiform variety of the minerals cummingtonite and grunerite. Crocidolite is the common name used for the asbestiform variety of the mineral riebeckite.
- ◆ Tile, vinyl, foam, plastic, and fine powder samples may contain asbestos fibers of such small diameter (< 0.25 microns in diameter) that these fibers cannot be detected by PLM. For such samples, more sensitive analytical methods (e.g. TEM, SEM, and XRD) are recommended if greater certainty about asbestos content is required. Semi-quantitative bulk TEM floor tile analysis is accepted under NESHAP regulations.
- ◆ These results are submitted pursuant to Aerobiology Laboratory Associates, Inc.'s current terms and conditions of sale, including the company's standard warranty and limitation of liability provisions. No responsibility or liability is assumed for the manner in which the results are used or interpreted.
- ◆ Unless notified in writing to return the samples covered by this report, Aerobiology Laboratory Associates, Inc. will store the samples for a minimum period of thirty (30) days before discarding. A shipping and handling charge will be assessed for the return of any samples.

#### Notes Required by NVLAP

- ◆ This report must not be used by the client to claim product certification, approval, or endorsement by NVLAP, NIST, or any agency of the Federal Government.
- ◆ This test report relates only to the items tested or calibrated.
- ◆ This report is not valid unless it bears the name of a NVLAP-approved signatory.
- ◆ Any reproduction of this document must include the entire document in order for the report to be valid.



# **Supporting Document 2**

**ACKNOWLEDGEMENT OF ASBESTOS ASSESSMENT  
NO. ASB23-0524**



**Permit # ASB23-0524  
Asbestos Acknowledgement**

**Acknowledgement Issued To:**

Steven Miles  
Miles Architectural Group  
10800 Sand Hollow Court  
Reno, NV 89521

**Project Address:**

3131 S VIRGINIA ST, RENO, NV 89502

**Project Type:**

Asbestos

**Assessment Category:**

**Assessment Results:**

**Project Description:**

Project associated with BLD23-10012E and -10129E

Rehabilitation of all guest rooms, to include all new finishes and fixtures. Exterior rehabilitation to include new exterior finishes, new stairs and new railing. Includes swimming pool removal.

Asbestos detected in white joint compound, white texture, and white acoustic ceiling texture. Joint compound composited with drywall to <1% asbestos. White texture and white acoustic ceiling texture found to contain 2-4% chrysotile asbestos and is regulated under the Asbestos NESHAP. Asbestos must be removed by a licensed abatement contractor prior to other renovation activities.

Use best practices to control dust. Dispose of waste properly.

**\*\*\*If asbestos is present, abatement must be conducted in accordance with NESHAP and OSHA regulations before renovation or demolition work may proceed. All Abatement and Demolition Notifications must be filed separately.\*\*\***

\_\_\_\_\_  
Health District Representative

08/03/2023

\_\_\_\_\_  
Date

# **Supporting Document 3**

**LIMITED ASBESTOS CONTAINING MATERIAL  
INSPECTION AND ASSESSMENT: 3131 SOUTH  
VIRGINIA STREET, RENO, NEVADA  
CONDUCTED NOVEMBER 2, 2023**



# C & G Environmental Consulting, Inc.

---

November 9, 2023  
C&G Environmental Project No. 01110223M

Vagabond Inn  
3131 S. Virginia Street  
Reno, NV 89502

**RE: LIMITED ASBESTOS CONTAINING MATERIAL INSPECTION AND ASSESSMENT: 3131 SOUTH VIRGINIA STREET, RENO, NEVADA**

C&G Environmental Consulting is pleased to submit this report that summarizes the results of a limited asbestos containing materials (ACM) inspection and assessment at the Vagabond Inn which is located at 3131 S. Virginia Street, in Reno, Nevada.

## **1.0 SCOPE OF SERVICES**

On November 2, 2023, EPA accredited, and State of Nevada licensed asbestos inspectors from C&G Environmental Consulting conducted a limited inspection and assessment of suspect building materials that were potentially going to be disturbed during an upcoming renovation project in guest rooms located throughout the above referenced facility. Since the majority of the guest rooms were occupied at the time of this assessment, approximately 25% (21 rooms) of the rooms were inspected to determine if building materials were homogenous. Consequently, it appeared that suspect building materials appeared to be homogenous throughout the rooms that were accessible and inspected.

A total of twenty (20) representative bulk samples were collected and analyzed of materials identified to have the potential to contain asbestos.

Suspect materials that were sampled during this inspection included; acoustic ceiling texture, drywall, drywall joint compound, wallpaper, carpet pad mastic, floor tile grout with mortar, wall tile grout with mortar, and leveling compound.

This inspection was conducted in accordance with accepted EPA and OSHA regulations. The samples were submitted under approved chain-of-custody protocol, and analyzed at Aerobiology Laboratory Associates, Inc., in Huntington Beach, California. The suspect ACM samples were analyzed for asbestos fibers utilizing Polarized Light Microscopy (PLM). The laboratory analytical report is attached in Appendix A, and the chain of custody record is provided in Appendix B. Approximate bulk sample locations are depicted in Figure 1 (attached).

## 2.0 ASBESTOS ANALYTICAL RESULTS

In accordance with OSHA 29 CFR 1926.1101 and NESHAPS 40 CFR 61.141 the definition of an asbestos containing material is “any material which contains more than one percent asbestos by weight”.

Analytical results indicated that acoustic ceiling texture, and drywall joint compound materials were positive for containing greater than 1% Chrysotile asbestos in various rooms located throughout the complex. Apartment. All other bulk samples collected during this investigation were “None Detected” for containing asbestos.

These sample results are limited to the materials that were identified and sampled during this inspection. If additional materials are discovered that have not been sampled, they would require additional sampling and analysis.

## 3.0 CONCLUSIONS/RECOMMENDATIONS

As a result of conducting this limited asbestos inspection; **friable** acoustic ceiling texture, and drywall joint compound materials were identified to contain greater than one percent asbestos in various guest rooms located throughout the facility.

Therefore, prior to any disturbance of these materials resulting from renovation, remodeling, or repair projects, C&G Environmental Consulting recommends that the following procedures are acknowledged in order to maintain regulatory compliance and reduce liability and health concerns:

- A certified asbestos abatement contractor licensed in the State of Nevada should be contracted to perform all activities involving the removal or disturbance of materials which contain asbestos. All abatement work should be done in strict accordance with applicable Federal, State and local regulations.
- Mandatory notification to State of Nevada OSHA and the Northern Nevada Public Health – Air Quality Management Division (NNPH-AQMD), which regulate the removal of friable asbestos **is required** prior to the removal/disturbance of the materials identified to contain >1% asbestos.
- All waste must be disposed of at a landfill facility that is licensed to accept friable asbestos waste.
- A certified asbestos consultant licensed in the State of Nevada must be contracted to conduct final clearance air monitoring and final clearance visual assessments after asbestos abatement is complete.

## 4.0 LIMITATIONS

C&G Environmental Consulting is not responsible for any claims or damages associated with the interpretation of information provided during this inspection. This report should not be regarded as a guarantee that no further asbestos exists beyond that which was

suspected and sampled during this inspection. In addition, asbestos is usually not distributed evenly throughout a particular material and C&G Environmental Consulting cannot guarantee that all materials sampled are exactly as represented throughout the entire building. In the event renovation or demolition activities uncover materials that were previously hidden or inaccessible during the time of this inspection, then additional sample collection and analysis would be required. In the event asbestos containing materials that were previously hidden or inaccessible during the time of this inspection are disturbed and an asbestos exposure occurs, C&G Environmental Consulting shall be held harmless and will not be responsible for any claims made, financial or otherwise.

C&G Environmental Consulting makes no warranties or guarantees as to the accuracy or completeness of information obtained from, provided by, or compiled by others. It is possible that information exists beyond the scope of this investigation. This report is not a legal opinion. The services performed by C&G Environmental Consulting have been conducted in a manner consistent with the level of care ordinarily exercised by members of our profession currently licensed by the State of Nevada to perform this work, and practicing under similar conditions. No other warranty, expressed or implied, is made.

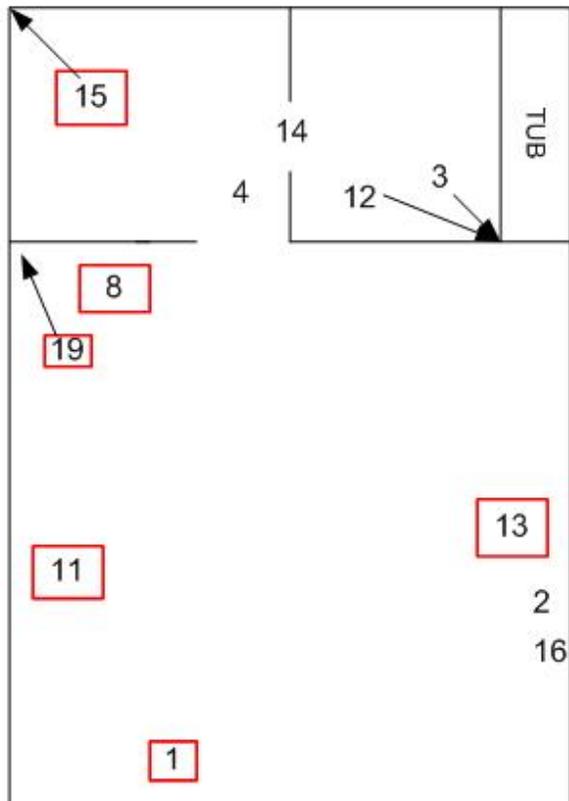
## 5.0 CLOSURE

We appreciated the opportunity to provide this service for the Vagabond Inn. Should you have any questions regarding the contents of this report, or need additional information, please contact us at your convenience.

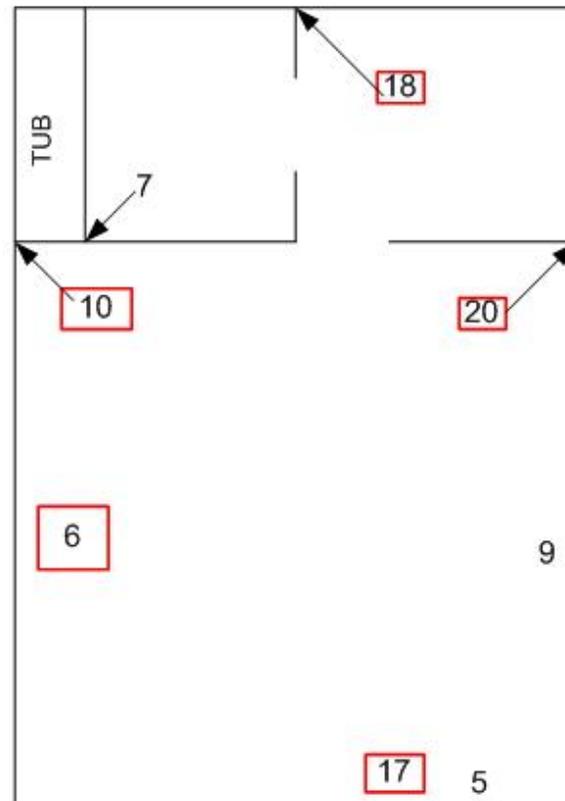
Respectfully Submitted,  
C&G ENVIRONMENTAL CONSULTING, INC.



Gene E. Johnson  
Certified Nevada Asbestos Consultant  
License No. IJPM0604



ROOMS 118, 150, 162, 210, 252



ROOMS 119, 133, 149, 153, 157, 249

- Denotes Location of Asbestos Containing Sample

(Not To Scale)

**C&G Environmental Consulting, Inc.**

Figure 1  
Approximate Locations of Bulk Samples  
3131 S. Virginia Street, Reno

Proj. No. 01110223M	Client: Vagabond Inn	Date: 11-9-23	By: G. Johnson
------------------------	-------------------------	------------------	-------------------

**APPENDIX A**  
**Laboratory Analytical Results**

**Certificate of Analysis**

Client Name: C&G Environmental Consulting, Inc.  
 Street address: P.O. Box 19476  
 City, State ZIP: Reno, NV 89511  
 Attn: Gene E. Johnson  
 Client Project Name: 3131 S. Virginia Street, Reno / 01110223M



Date Collected: 11/02/23  
 Date Received: 11/03/23  
 Date Analyzed: 11/07/23  
 Date Reported: 11/07/23  
 Project ID: 23046273

Test Requested: **3002, Asbestos in Bulk Samples**  
 Method: Polarized Light Microscopy (PLM)  
 EPA 600/R-93/116. Method for the Determination of Asbestos in Bulk Building Materials.  
 40 CFR, Part 763, Appendix E to Subpart E, Interim Method for the Determination of Asbestos in Bulk Insulation Samples.

Sample Identification		Physical Description of Sample/Layer	Homo- geneous (Y/N)	Layer Percentage	Asbestos Detected	Non-Asbestos Fibers Percentage	Non-Fibrous Percentage	Matrix Material
Client	Lab Sample Number							
162-AC-1	23046273-001-1	White Acoustic Texture	Y	40	CHRY 5%	2 CELL	93	C
	23046273-001-2	White Joint Compound	Y	15	CHRY 2%	3 CELL	95	C
	23046273-001-3	White Drywall with Paper	Y	45	ND	12 CELL, 8 FBG	80	G
162-CPM-2	23046273-002	Yellow/Tan Carpet Pad Mastic	Y	100	ND	15 SYN	85	B
162-WTG-3	23046273-003-1	Light Gray Grout	Y	40	ND		100	C, G
	23046273-003-2	White/Tan Mortar	Y	60	ND		100	G, C, B
162-FTG-4	23046273-004-1	White Mortar	Y	40	ND		100	G, C
	23046273-004-2	Gray Leveling Compound	Y	60	ND	2 CELL	98	C
157-FTG-5	23046273-005-1	White/Beige Grout	Y	30	ND		100	C, G
	23046273-005-2	White Mortar	Y	70	ND		100	G, C

*Miguel Ines*  
 Miguel Ines  
 Laboratory Analyst

*Miguel Ines*  
 Miguel Ines  
 Asbestos Laboratory Supervisor

- |      |               |      |                    |   |            |
|------|---------------|------|--------------------|---|------------|
| A    | Amosite       | CELL | Cellulose          | Q | Quartz     |
| AC   | Actinolite    | MW   | Mineral Wool       | C | Carbonates |
| AN   | Anthophyllite | FBG  | Fiberglass         | G | Gypsum     |
| CHRY | Chrysotile    | SYN  | Synthetic          | M | Mica       |
| CR   | Crocidolite   | WO   | Wollastonite       | T | Tar        |
| TR   | Tremolite     | FT   | Fibrous Talc       | P | Perlite    |
| <1%  | Less Than 1%  | AH   | Animal Hair        | B | Binder     |
| ND   | None Detected | NAC  | Non-Asbestiform AC | D | Diatoms    |
|      |               | NTR  | Non-Asbestiform TR |   |            |

**Certificate of Analysis**

Client Name: C&G Environmental Consulting, Inc.  
 Street address: P.O. Box 19476  
 City, State ZIP: Reno, NV 89511  
 Attn: Gene E. Johnson  
 Client Project Name: 3131 S. Virginia Street, Reno / 01110223M



Date Collected: 11/02/23  
 Date Received: 11/03/23  
 Date Analyzed: 11/07/23  
 Date Reported: 11/07/23  
 Project ID: 23046273

Test Requested: **3002, Asbestos in Bulk Samples**  
 Method: Polarized Light Microscopy / Dispersion Staining (PLM), Method for the Determination of Asbestos in Bulk Building Materials. EPA-600/R-93/116, July 1993.

Sample Identification		Physical Description of Sample/Layer	Homo- geneous (Y/N)	Layer Percentage	Asbestos Detected	Non-Asbestos Fibers Percentage	Non-Fibrous Percentage	Matrix Material
Client	Lab Sample Number							
153-AC-6	23046273-006-1	White Acoustic Texture	Y	50	CHRY 7%	3 CELL	90	C
	23046273-006-2	White Joint Compound	Y	10	CHRY 2%	3 CELL	95	C
	23046273-006-3	White Drywall with Paper	Y	40	ND	12 CELL, 8 FBG	80	G
153-WTG-7	23046273-007-1	Off-White Grout	Y	25	ND		100	C, G
	23046273-007-2	White/Gray Mortar	Y	75	ND		100	G, C, B
150-AC-8	23046273-008-1	White Acoustic Texture	Y	45	CHRY 7%	3 CELL	90	C
	23046273-008-2	White Joint Compound	Y	15	CHRY 2%	3 CELL	95	C
	23046273-008-3	White Drywall with Paper	Y	40	ND	12 CELL, 8 FBG	80	G
149-CPM-9	23046273-009	Yellow Carpet Pad Mastic	Y	100	ND	30 SYN	70	B
119-W-10	23046273-010-1	Off-White Wallpaper	Y	45	ND	30 COTTON	70	Other

*Miguel Ines*  
 Miguel Ines  
 Laboratory Analyst

*Miguel Ines*  
 Miguel Ines  
 Asbestos Laboratory Supervisor

- |                  |                        |              |
|------------------|------------------------|--------------|
| A Amosite        | CELL Cellulose         | O Quartz     |
| AC Actinolite    | MW Mineral Wool        | C Carbonates |
| AN Anthophyllite | FBG Fiberglass         | G Gypsum     |
| CHRY Chrysotile  | SYN Synthetic          | M Mica       |
| CR Crocidolite   | WO Wollastonite        | T Tar        |
| TR Tremolite     | FT Fibrous Talc        | P Perlite    |
| <1% Less Than 1% | AH Animal Hair         | B Binder     |
| ND None Detected | NAC Non-Asbestiform AC | D Diatoms    |
|                  | NTR Non-Asbestiform TR |              |

**Certificate of Analysis**

Client Name: C&G Environmental Consulting, Inc.  
 Street address: P.O. Box 19476  
 City, State ZIP: Reno, NV 89511  
 Attn: Gene E. Johnson  
 Client Project Name: 3131 S. Virginia Street, Reno / 01110223M



Date Collected: 11/02/23  
 Date Received: 11/03/23  
 Date Analyzed: 11/07/23  
 Date Reported: 11/07/23  
 Project ID: 23046273

Test Requested: **3002, Asbestos in Bulk Samples**  
 Method: Polarized Light Microscopy / Dispersion Staining (PLM), Method for the Determination of Asbestos in Bulk Building Materials. EPA-600/R-93/116, July 1993.

Sample Identification		Physical Description of Sample/Layer	Homo- geneous (Y/N)	Layer Percentage	Asbestos Detected	Non-Asbestos Fibers Percentage	Non-Fibrous Percentage	Matrix Material
Client	Lab Sample Number							
119-W-10	23046273-010-2	Off-White Joint Compound	Y	20	CHRY 2%	3 CELL	95	C
	23046273-010-3	White Drywall with Paper	Y	35	ND	12 CELL, 8 FBG	80	G
118-AC-11	23046273-011-1	White Acoustic Texture	Y	60	CHRY 5%	2 CELL	93	C
	23046273-011-2	White Joint Compound	Y	10	CHRY 2%	3 CELL	95	C
	23046273-011-3	White Drywall with Paper	Y	30	ND	10 CELL, 5 FBG	85	G
118-WTG-12	23046273-012-1	White Grout	Y	25	ND		100	C, G
	23046273-012-2	White/Tan Mortar	Y	75	ND		100	G, C, B
210-AC-13	23046273-013-1	White Acoustic Texture	Y	50	CHRY 6%	2 CELL	92	C
	23046273-013-2	White Joint Compound	Y	15	CHRY 2%	3 CELL	95	C
	23046273-013-3	White Drywall with Paper	Y	35	ND	12 CELL, 8 FBG	80	G

*Miguel Ines*  
 Miguel Ines  
 Laboratory Analyst

*Miguel Ines*  
 Miguel Ines  
 Asbestos Laboratory Supervisor

- |                  |                        |              |
|------------------|------------------------|--------------|
| A Amosite        | CELL Cellulose         | O Quartz     |
| AC Actinolite    | MW Mineral Wool        | C Carbonates |
| AN Anthophyllite | FBG Fiberglass         | G Gypsum     |
| CHRY Chrysotile  | SYN Synthetic          | M Mica       |
| CR Crocidolite   | WO Wollastonite        | T Tar        |
| TR Tremolite     | FT Fibrous Talc        | P Perlite    |
| <1% Less Than 1% | AH Animal Hair         | B Binder     |
| ND None Detected | NAC Non-Asbestiform AC | D Diatoms    |
|                  | NTR Non-Asbestiform TR |              |

**Certificate of Analysis**

Client Name: C&G Environmental Consulting, Inc.  
 Street address: P.O. Box 19476  
 City, State ZIP: Reno, NV 89511  
 Attn: Gene E. Johnson  
 Client Project Name: 3131 S. Virginia Street, Reno / 01110223M



Date Collected: 11/02/23  
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 Project ID: 23046273

Test Requested: **3002, Asbestos in Bulk Samples**  
 Method: Polarized Light Microscopy / Dispersion Staining (PLM), Method for the Determination of Asbestos in Bulk Building Materials. EPA-600/R-93/116, July 1993.

Sample Identification		Physical Description of Sample/Layer	Homo- geneous (Y/N)	Layer Percentage	Asbestos Detected	Non-Asbestos Fibers Percentage	Non-Fibrous Percentage	Matrix Material
Client	Lab Sample Number							
210-FTG-14	23046273-014-1	Gray/White Grout	Y	65	ND		100	C, G
	23046273-014-2	White Mortar	Y	35	ND		100	G, C, B
210-W-15	23046273-015-1	Off-White Wallpaper	Y	40	ND	30 COTTON	70	Other
	23046273-015-2	Off-White Joint Compound	Y	30	CHRY 2%	3 CELL	95	C
	23046273-015-3	White Drywall with Paper	Y	30	ND	12 CELL, 8 FBG	80	G
210-CPM-16	23046273-016	Yellow Carpet Pad Mastic	Y	100	ND	25 SYN	75	B
233-AC-17	23046273-017-1	White Acoustic Texture	Y	45	CHRY 6%	2 CELL	92	C
	23046273-017-2	White Joint Compound	Y	25	CHRY 2%	3 CELL	95	C
	23046273-017-3	White Drywall with Paper	Y	30	ND	12 CELL, 8 FBG	80	G
233-W-18	23046273-018-1	Off-White Wallpaper	Y	35	ND	30 COTTON	70	Other

*Miguel Ines*  
 Miguel Ines  
 Laboratory Analyst

*Miguel Ines*  
 Miguel Ines  
 Asbestos Laboratory Supervisor

- |                  |                        |              |
|------------------|------------------------|--------------|
| A Amosite        | CELL Cellulose         | O Quartz     |
| AC Actinolite    | MW Mineral Wool        | C Carbonates |
| AN Anthophyllite | FBG Fiberglass         | G Gypsum     |
| CHRY Chrysotile  | SYN Synthetic          | M Mica       |
| CR Crocidolite   | WO Wollastonite        | T Tar        |
| TR Tremolite     | FT Fibrous Talc        | P Perlite    |
| <1% Less Than 1% | AH Animal Hair         | B Binder     |
| ND None Detected | NAC Non-Asbestiform AC | D Diatoms    |
|                  | NTR Non-Asbestiform TR |              |

**Certificate of Analysis**

Client Name: C&G Environmental Consulting, Inc.  
 Street address: P.O. Box 19476  
 City, State ZIP: Reno, NV 89511  
 Attn: Gene E. Johnson  
 Client Project Name: 3131 S. Virginia Street, Reno / 01110223M



Date Collected: 11/02/23  
 Date Received: 11/03/23  
 Date Analyzed: 11/07/23  
 Date Reported: 11/07/23  
 Project ID: 23046273

Test Requested: **3002, Asbestos in Bulk Samples**  
 Method: Polarized Light Microscopy / Dispersion Staining (PLM), Method for the Determination of Asbestos in Bulk Building Materials. EPA-600/R-93/116, July 1993.

Sample Identification		Physical Description of Sample/Layer	Homo- geneous (Y/N)	Layer Percentage	Asbestos Detected	Non-Asbestos Fibers Percentage	Non-Fibrous Percentage	Matrix Material
Client	Lab Sample Number							
233-W-18	23046273-018-2	Off-White Joint Compound	Y	30	CHRY 2%	3 CELL	95	C
	23046273-018-3	White Drywall with Paper	Y	35	ND	12 CELL, 8 FBG	80	G
252-AC-19	23046273-019-1	White Acoustic Texture	Y	55	CHRY 5%	2 CELL	93	C
	23046273-019-2	White Joint Compound	Y	25	CHRY 2%	3 CELL	95	C
	23046273-019-3	White Drywall with Paper	Y	20	ND	12 CELL, 8 FBG	80	G
249-W-20	23046273-020-1	Off-White Wallpaper	Y	50	ND	30 COTTON	70	Other
	23046273-020-2	Off-White Joint Compound	Y	30	CHRY 2%	3 CELL	95	C
	23046273-020-3	White Drywall with Paper	Y	20	ND	12 CELL, 8 FBG	80	G

*Miguel Cortez Ines*  
 Miguel Ines  
 Laboratory Analyst

*Miguel Cortez Ines*  
 Miguel Ines  
 Asbestos Laboratory Supervisor

- |                  |                        |              |
|------------------|------------------------|--------------|
| A Amosite        | CELL Cellulose         | O Quartz     |
| AC Actinolite    | MW Mineral Wool        | C Carbonates |
| AN Anthophyllite | FBG Fiberglass         | G Gypsum     |
| CHRY Chrysotile  | SYN Synthetic          | M Mica       |
| CR Crocidolite   | WO Wollastonite        | T Tar        |
| TR Tremolite     | FT Fibrous Talc        | P Perlite    |
| <1% Less Than 1% | AH Animal Hair         | B Binder     |
| ND None Detected | NAC Non-Asbestiform AC | D Diatoms    |
|                  | NTR Non-Asbestiform TR |              |

## Certificate of Analysis

C&G Environmental Consulting, Inc.  
P.O. Box 19476  
Reno, NV 89511  
Gene E. Johnson

**Client Project Name:** 3131 S. Virginia Street, Reno / 01110223M



Date Collected: 11/02/23  
Date Received: 11/03/23  
Date Analyzed: 11/07/23  
Date Reported: 11/07/23  
Project ID: 23046273

### General Notes

- ◆ **ND** indicates no asbestos was detected; for calibrated visual estimation (CVES), the method detection limit is 1%.
- ◆ "<1%" indicates asbestos was identified in the sample. For lower concentrations, Point Counting is recommended.
- ◆ All regulated asbestos minerals (i.e. chrysotile, amosite, crocidolite, anthophyllite, tremolite, and actinolite) were sought in every layer of each sample, but only those asbestos minerals detected are listed. Amosite is the common name for the asbestiform variety of the minerals cummingtonite and grunerite. Crocidolite is the common name used for the asbestiform variety of the mineral riebeckite.
- ◆ Tile, vinyl, foam, plastic, and fine powder samples may contain asbestos fibers of such small diameter (< 0.25 microns in diameter) that these fibers cannot be detected by PLM. For such samples, more sensitive analytical methods (e.g. TEM, SEM, and XRD) are recommended if greater certainty about asbestos content is required. Semi-quantitative bulk TEM floor tile analysis is accepted under NESHAP regulations.
- ◆ These results are submitted pursuant to Aerobiology Laboratory Associates, Inc.'s current terms and conditions of sale, including the company's standard warranty and limitation of liability provisions. No responsibility or liability is assumed for the manner in which the results are used or interpreted.
- ◆ Unless notified in writing to return the samples covered by this report, Aerobiology Laboratory Associates, Inc. will store the samples for a minimum period of thirty (30) days before discarding. A shipping and handling charge will be assessed for the return of any samples.
- ◆ Aerobiology does not guarantee the results of tape lifts, microvac, wipe, and/or debris samples. Accurate analysis cannot be performed due to particle size, media used, and/or amount of material given. Analysis of these materials should be performed by a TEM. ***A result of ND does not indicate that the sample area does not contain asbestos. It means the analyst could not identify asbestos in the specific sample for the reasons listed above.***

### Notes Required by NVLAP

- ◆ This report must not be used by the client to claim product certification, approval, or endorsement by NVLAP, NIST, or any agency of the Federal Government.
- ◆ This test report relates only to the items tested or calibrated.
- ◆ This report is not valid unless it bears the name of a NVLAP-approved signatory.
- ◆ Any reproduction of this document must include the entire document in order for the report to be valid.

**APPENDIX B**  
**Chain of Custody Record**

# C&G ENVIRONMENTAL CONSULTING, INC

P.O. Box 19476

Reno, NV 89511

Ph: (775) 746-3838

Fax: (775) 787-6846

23046273

## \*\*\* BULK SAMPLE SUBMISSION FORM / CHAIN-OF-CUSTODY REPORT \*\*\*

Analysis Type:

PLM

Point Count

TEM

Lead

48 HR TAT

Turnaround:

RUSH

STANDARD

Job Site: 3131 S. VIRGINIA STREET, RENO

Job No: 01110223M

P.O. #:

Contact person:

### STANDING ORDER - ONLY ANALYZE MATERIALS LISTED IN "DESCRIPTION" SECTION OF COC

Sample number	Location	Description
162-AC-1	SEE FLOOR PLAN	ACOUSTIC TEXTURE / JOINT Comp / DW
162-CPM-2		CARPET PAD MASTIC
162-WTG-3		WALL TILE GROUT / MORTAR
162-FTG-4		TILE MORTAR / LEVELING Comp
157-FTG-5		TILE GROUT / MORTAR
153-AC-6		ACOUSTIC TEXTURE / JOINT Comp / DW
153-WTG-7		WALL TILE GROUT / MORTAR
150-AC-8		ACOUSTIC TEXTURE / JOINT Comp / DW
149-CPM-9		CARPET PAD MASTIC
119-W-10		WALLPAPER / JOINT Comp / DW
118-AC-11		ACOUSTIC TEXTURE / JOINT Comp / DW
118-WTG-12		WALL TILE GROUT / MORTAR
210-AC-13		ACOUSTIC TEXTURE / JOINT Comp / Veneer?
210-FTG-14		TILE GROUT / MORTAR
210-W-15		WALLPAPER / JOINT Comp / DW
210-CPM-16		CARPET PAD MASTIC
233-AC-17		ACOUSTIC TEXTURE / JOINT Comp / DW
233-W-18		WALLPAPER / JOINT Comp / DW
252-AC-19		ACOUSTIC CEILING TEXTURE / JOINT Comp / DW
249-W-20		WALLPAPER / JOINT Comp / DW

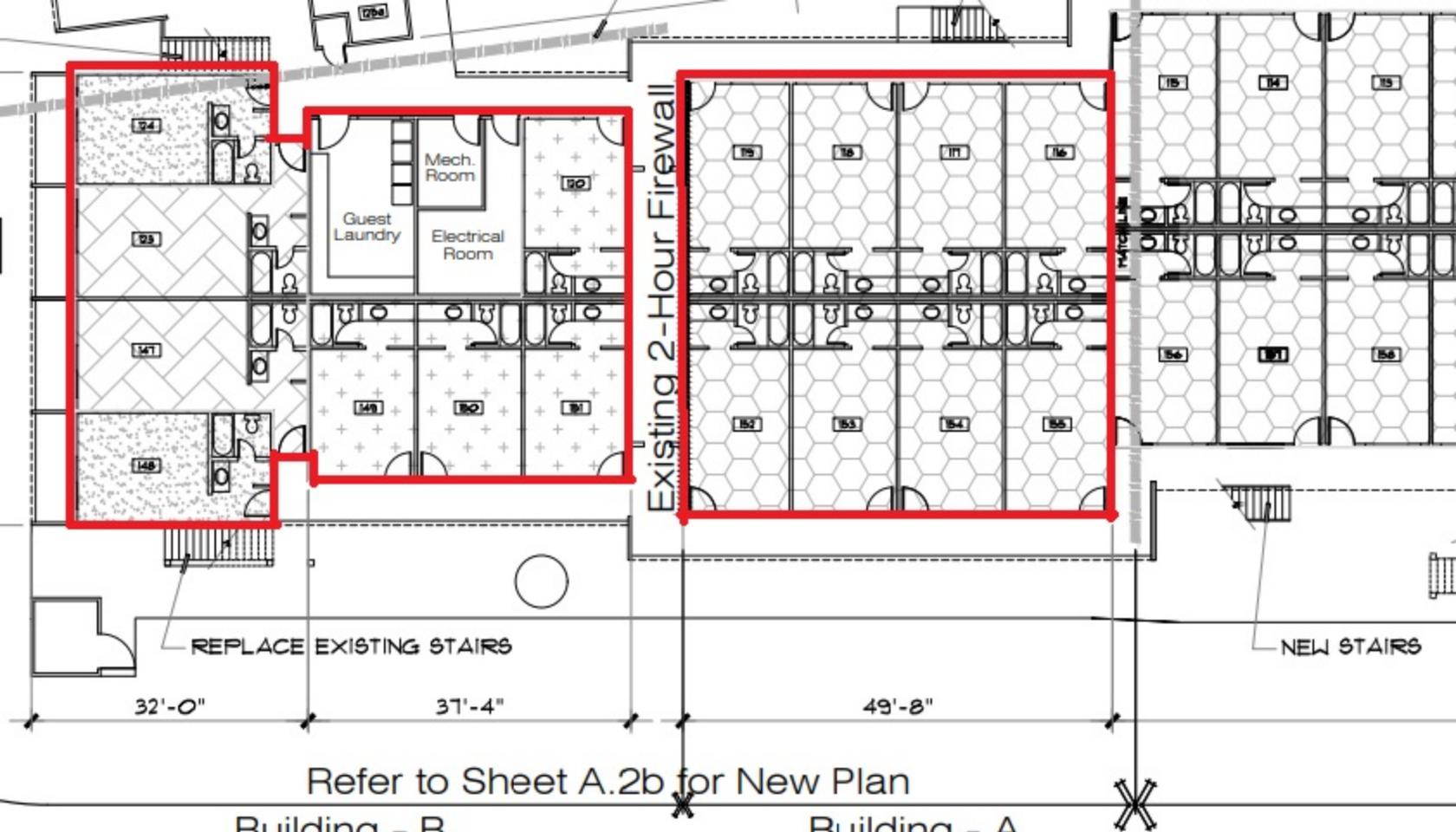
Special Instructions: \_\_\_\_\_

Relinquished By	Date / Time	Received By	Date / Time
Name/Company <u>Gene E. Johnson/C&amp;G Enr. Const.</u>	<u>11-2-23</u>	Name/Company <u>CU</u>	<u>11/3/23</u>
Signature <u>Gene E Johnson</u>	<u>3:30pm</u>	Signature <u>CU</u>	<u>9:40am</u>
Name/Company		Name/Company	
Signature		Signature	

Send Original to Lab - Keep Yellow Copy

# **Supporting Document 4**

**AREA OF IMPROPER ASBESTOS DISTURBANCE  
AND REMOVAL**



Building - B  
Permit - BLD23-10129E

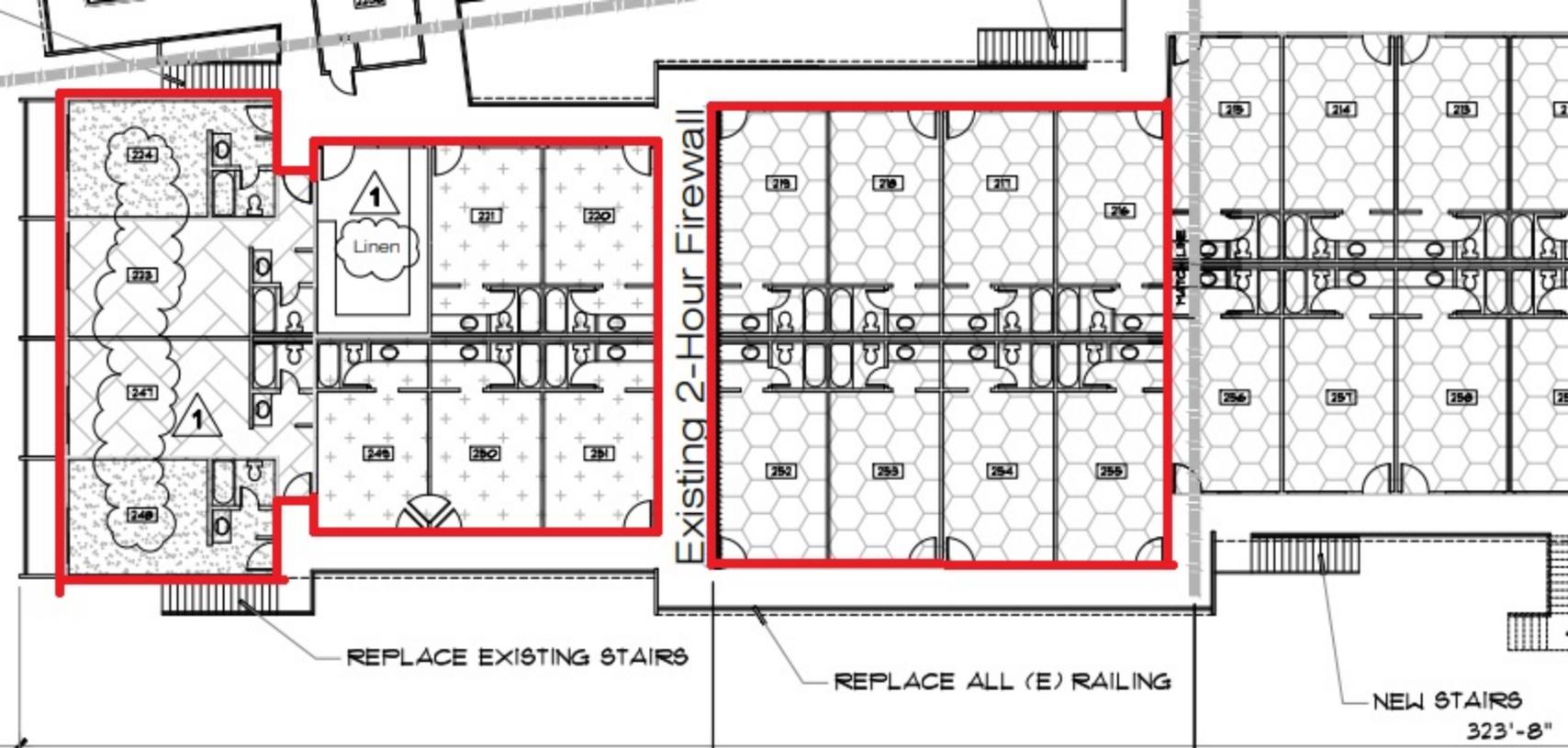
Building - A  
Permit - BLD23-10012E

Refer to Sheet A.2b for New Plan

 Rooms being renovated on 1st Floor

# Existing First Floor Plan

1/16" = 1'-0"



Refer to Sheet A.2b for New Plan

Building - B  
Permit - BLD23-10129E

Building - A  
Permit - BLD23-10012E

 Rooms being renovated

# Existing Second Floor Plan

## **Area of Disturbance**

This image represents the area where the spray acoustic ceiling texture was improperly removed and/or disturbed. The disturbance occurred on the first and second floor of the building, in total disturbing approximately 10,000 square feet of asbestos containing material.



# **Supporting Document 5**

## **PHOTOGRAPHIC DOCUMENTATION**

## **Photographs**

Former Vagabond Inn  
3131 S Virginia Street  
Reno, NV 89502  
Taken on May 7-8, 2024

**Photograph 1**

**Date: 5/7/24**

**Direction: W**

Image of the work area on the south side of the east/west oriented portion of the motel. The white debris on the sidewalk and the parking lot contains asbestos containing spray acoustic ceiling texture.



**Photograph 2**

**Date:** 5/7/24

**Direction:** N

Image of the interior of Room 155. This photograph is an example of a room during renovation where the asbestos containing spray acoustic ceiling was removed. The walls and ceiling have newly applied joint compound. The floor is covered in asbestos containing spray acoustic ceiling texture debris.



**Photograph 3**

**Date: 5/7/24**

**Direction: N**

This image demonstrates the work area on the south side of the facility.



**Photograph 4**

**Date:** 5/7/24

**Direction:** N

This image demonstrates a guest room which was not being renovated at the time of the response. This room is several doors to the east of the guest rooms actively being renovated. This is an example of the asbestos containing spray acoustic ceiling texture present in the guest rooms at the facility.



**Photograph 5**

**Date:** 5/7/24

**Direction:** N

This photo is a close-up of the spray acoustic ceiling in room 163. This image demonstrates a guest room which was not being renovated at the time of the response. This room is several doors to the east of the guest rooms actively being renovated. This is an example of the asbestos containing spray acoustic ceiling texture present in the guest rooms at the facility.



**Photograph 6**

**Date: 5/7/24**

**Direction: S**

This image demonstrates the extent of the interior renovation of room 118. This photograph is an example of a room during renovation where the asbestos containing spray acoustic ceiling was removed. The walls and ceiling have newly applied joint compound. The floor is covered in asbestos containing spray acoustic ceiling texture debris.



**Photograph 7**

**Date: 5/7/24**

**Direction: S**

This photo shows the area of renovation on the north side of the facility. Asbestos containing debris is visible on the ground and in the landscaping.



**Photograph 8**

**Date:** 5/7/24

**Direction:** S

This photo shows the area of renovation on the north side of the facility. Asbestos containing debris is visible on the ground and in the landscaping.



**Photograph 9**

**Date: 5/7/24**

**Direction: E**

This photo demonstrates the inside of room 142, a guest room which was not being renovated at the time of the response. This is an example of the asbestos containing spray acoustic ceiling texture present in the guest rooms at the facility.



**Photograph 10**

**Date: 5/8/24**

**Direction: W**

This photo shows asbestos containing debris on the ground adjacent to the dumpster. The material on the ground along the curb edge was sampled for asbestos (sample #2). The sampled material on the curb edge appeared to have been scraped from workers shoes.



**Photograph 11**

**Date: 5/8/24**

**Direction: N**

This image demonstrates a large piece of asbestos containing spray acoustic ceiling texture debris found on the ground outside room 153 which was being renovated. The spray acoustic ceiling debris is in the lower left corner of the photo. The debris was collected and tested positive for asbestos (sample #3).

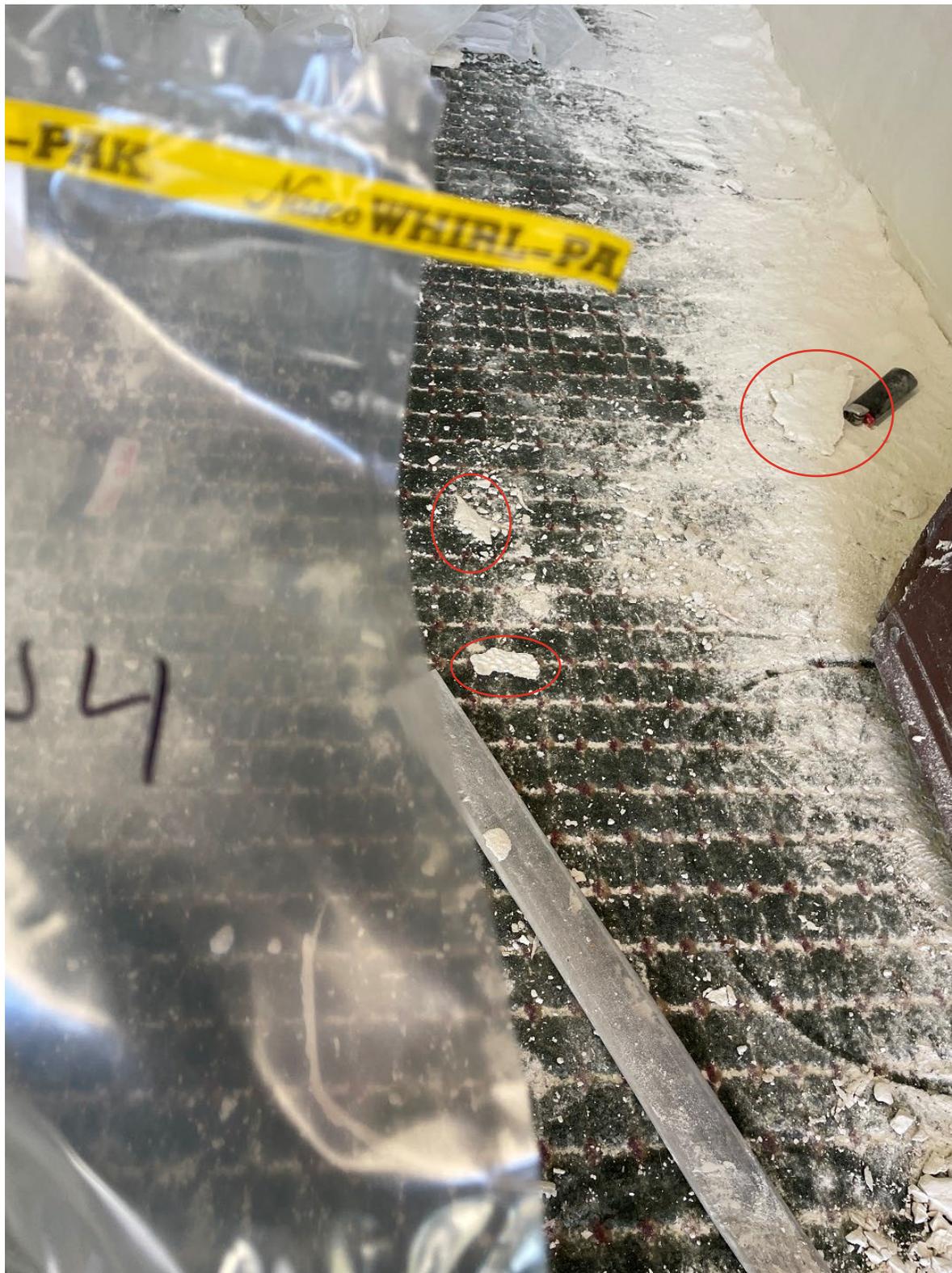


**Photograph 12**

**Date: 5/8/24**

**Direction: W**

This image demonstrates pieces of asbestos containing spray acoustic ceiling texture debris found on the ground inside room 253 which was being renovated. The spray acoustic ceiling debris is in the center and adjacent to the lighter in the photo. The debris was collected and tested positive for asbestos (sample #4).



**Photograph 13**

**Date: 5/8/24**

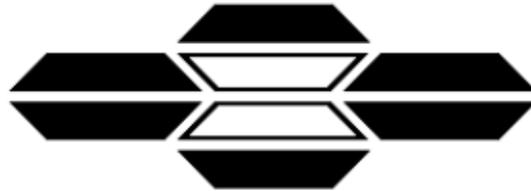
**Direction: S**

This image demonstrates an example of the posting of Stop Work Order No. 00010. The Stop Work Order was posted throughout the active renovation area and on the dumpster.



# **Supporting Document 6**

**AQMD ASBESTOS SAMPLE LAB ANALYSIS**



**ASBESTOS TEM LABORATORIES, INC.**

**EPA Interim Method  
Polarized Light Microscopy  
Analytical Report**

**Laboratory Job # 392043**

**Version 1**

3431 Ettie St.  
Oakland, CA 94608  
(510) 704-8930

FAX (510) 704-8429

[www.asbestostemplabs.com](http://www.asbestostemplabs.com)

*With Branch Offices Located At:*

1320 FREEPORT BLVD. #104, SPARKS, NV 89431

---



ASBESTOS TEM LABORATORIES, INC

CA ELAP  
Lab No. 1866



May-08-24

Jeff Jeppson

RE: LABORATORY JOB # 392043

Polarized light microscopy analytical results for 12 bulk sample(s).

Job Site:

Job No.: 3131 S. Virginia St

Enclosed please find the bulk material analytical results for one or more samples submitted for asbestos analysis. The analyses were performed in accordance with EPA Method 600/R-93/116 or 600/M4-82-020 for the determination of asbestos in bulk building materials by polarized light microscopy (PLM). Please note that while PLM analysis is commonly performed on non-friable and fine grained materials such as floor tiles and dust, the EPA method recognizes that PLM is subject to limitations. In these situations, accurate results may only be obtainable through the use of more sophisticated and accurate techniques such as transmission electron microscopy (TEM) or X-ray diffraction (XRD).

Prior to analysis, samples are logged-in and all data pertinent to the sample recorded. The samples are checked for damage or disruption of any chain-of-custody seals. A unique laboratory ID number is assigned to each sample. A hard copy log-in sheet containing all pertinent information concerning the sample is generated. This and all other relevant paper work are kept with the sample throughout the analytical procedures to assure proper analysis.

Each sample is opened in a class 100 HEPA negative air hood. A representative sampling of the material is selected and placed onto a glass microscope slide containing a drop of refractive index oil. The glass slide is placed under a polarizing light microscope where standard mineralogical techniques are used to analyze and quantify the various materials present, including asbestos. The data is then compiled into a standard report format and reviewed by the authorized signatory before being released to the client.

Asbestos concentrations stated in the report are given in terms of ranges e.g. <1%, 1-5%, 5-10%, etc. When using these ranges to determine whether a material is considered a regulated asbestos containing material (ACM), it is important to consider which regulation is being applied. Under the EPA AHERA, OSHA and CalOSHA regulations, the term ACM means "any material containing more than one percent asbestos." However, the California DTSC (Dept of Toxic Substances Control), which regulates asbestos in schools in California, states "DTSC classifies asbestos-containing material as hazardous waste if it is friable and contains one percent (1.0%) or more asbestos as hazardous waste." As the test method is not sensitive enough to allow an analyst to say a material contains exactly 1% asbestos, a reported concentration of <1% shall be read to mean <=1% and 1-5% shall be read to mean >1%-5% when applying the EPA AHERA, OSHA and CalOSHA regulations. However, when applying the DTSC regulations the concentrations are to be read as stated.

Sincerely Yours,

Lab Manager  
ASBESTOS TEM LABORATORIES, INC.

*Disclaimer - These results relate only to the samples tested as received and must not be reproduced, except in full, with the approval of the laboratory. Incorrect or illegible information supplied by the customer may adversely affect the validity of test results. This report must not be used to claim product endorsement by NVLAP or any other agency of the U.S. Government.*

*Note: Test samples will be stored for three months after data of receipt, after which they will be properly disposed unless client makes other arrangements with the laboratory.*

# POLARIZED LIGHT MICROSCOPY ANALYTICAL REPORT

EPA Method 600/R-93/116 or 600/M4-82-020

Page: 1 of 1

Contact: Jeff Jeppson	Samples Indicated: 6	Report No. <b>392043</b>
Address:	Reg. Samples Analyzed: 12	Version No. <u>1</u>
	Split Layers Analyzed: 0	Date Submitted: May-08-24
	Job Site / No. 3131 S. Virginia St	Date Reported: May-08-24

SAMPLE ID	%	ASBESTOS TYPE	OTHER DATA	DESCRIPTION
			1) Non-Asbestos Fibers 2) Matrix Materials 3) Date/Time Collected 4) Date Analyzed	FIELD LAB
1.	5-10%	Chrysotile	1) None Detected 2) 90-95% Paint, Mica, Other m.p.	White Acoustic Ceiling Debris
Lab ID # 904-00001-001	Homogeneity*: Good		3)                      4) May-08-24	Acoustic Ceiling-White
2.	1-5%	Chrysotile	1) 5-10% Cellulose 2) 85-94% Calc, Gyp, Other m.p.	Off White Debris
Lab ID # 904-00001-002	Homogeneity*: Med		3)                      4) May-08-24	Debris-Grey
3.	10-20%	Chrysotile	1) 1-5% Cellulose 2) 75-89% Mica, Gyp, Other m.p.	White Acoustic Ceiling Debris
Lab ID # 904-00001-003	Homogeneity*: Good		3)                      4) May-08-24	Acoustic Ceiling-White
4.	5-10%	Chrysotile	1) None Detected 2) 90-95% Mica, Gyp, Other m.p.	White Acoustic Ceiling Debris
Lab ID # 904-00001-004	Homogeneity*: Good		3)                      4) May-08-24	Acoustic Ceiling-White
5.	1-5%	Chrysotile	1) 5-10% Cellulose 2) 85-94% Calc, Mica, Other m.p.	Off White Debris
Lab ID # 904-00001-005	Homogeneity*: Med		3)                      4) May-08-24	Debris-Grey
6.		None Detected	1) 1-5% Cellulose 2) 95-99% Calc, Mica, Other m.p.	White Acoustic Ceiling Debris
Lab ID # 904-00001-006	Homogeneity*: Good		3)                      4) May-08-24	Acoustic Ceiling-White
Lab ID #	Homogeneity*:		1)                      2) 3)                      4)	
Lab ID #	Homogeneity*:		1)                      2) 3)                      4)	
Lab ID #	Homogeneity*:		1)                      2) 3)                      4)	
Lab ID #	Homogeneity*:		1)                      2) 3)                      4)	

Detection Limit of Method is Estimated to be 1% Asbestos Using a Visual Area Estimation Technique.  
\* - Samples with a Lab ID# ending in a letter are inhomogeneous exhibiting multiple layers, with each layer analyzed separately and labeled (e.g. A,B,C..).

Analyst Eric Zubar



# ATEM LABORATORIES CHAIN OF CUSTODY

CALIFORNIA: 3431 Ettie Street Oakland, CA 94608

Phone (510) 704-8930 Fax (510) 704-8429

NEVADA: 1350 Freeport Blvd. #104, Sparks, NV 89431

Phone (775) 359-3377 Fax (775) 359-2798

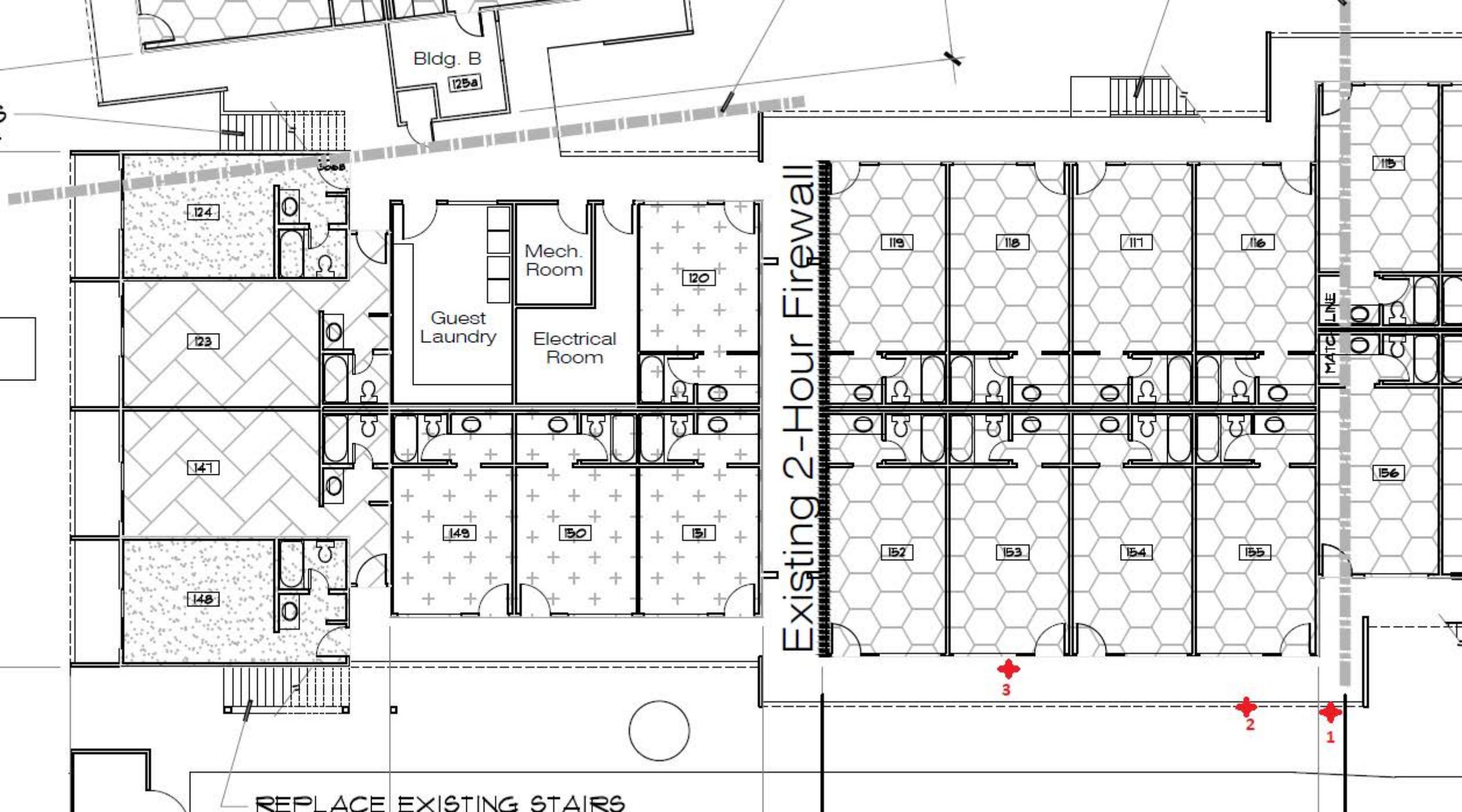
You may also email this chain of custody to [asbestostemplabs.ca@gmail.com](mailto:asbestostemplabs.ca@gmail.com)

\* denotes required field

392043

Company: NNPH - AQMD		Contact: * Jeff Jeppson			Phone: * 775-784-7232			Email: * <a href="mailto:jjjeppson@nnph.org">jjjeppson@nnph.org</a>										
Address: * 1001 E. 9th St.		City: * Reno			State: * NV Zip: 89512			Email:										
Job Site: * 3131 S. Virginia St.				Job #:		PO #:		Email:										
Reporting *	<input type="checkbox"/> Email	<input type="checkbox"/> Phone	<input type="checkbox"/> Fax	<input checked="" type="checkbox"/> Mail	<input type="checkbox"/> Pickup	Billing	<input checked="" type="checkbox"/> Email	<input type="checkbox"/> Fax	<input checked="" type="checkbox"/> Mail	<input type="checkbox"/> Pre-Paid	Billing Email: <i>Same</i>							
Results Due:*	<input type="checkbox"/> 2 HR		<input type="checkbox"/> 4 HR		<input type="checkbox"/> 6 HR		<input type="checkbox"/> 8 HR		<input checked="" type="checkbox"/> 24 HR		<input type="checkbox"/> 48 HR	<input type="checkbox"/> 3 DAY	<input type="checkbox"/> 5 DAY	<input type="checkbox"/> 10 DAY	<input type="checkbox"/> Hold Samples (Until _____)	<input type="checkbox"/> After Hours: **		
Asbestos Air	<input type="checkbox"/> PCM NIOSH 7400		<input type="checkbox"/> A or B		<input type="checkbox"/> TEM AHERA		<input type="checkbox"/> TEM CARB Mod. AHERA		<input type="checkbox"/> TEM EPA Yamate Level II		<input type="checkbox"/> TEM NIOSH 7402		<input type="checkbox"/> ISO 10312		<input type="checkbox"/> ISO 13794		<input type="checkbox"/> Sensitivity _____	
Asbestos Bulk	<input checked="" type="checkbox"/> PLM Standard (EPA 600/R-93-1)			<input type="checkbox"/> PLM 400 Point Count		<input type="checkbox"/> PLM 1000 PC		<input type="checkbox"/> PLM 400 PC Gravimetric Reduction			<input type="checkbox"/> PLM 1000 PC Grav. Red.		<input type="checkbox"/> TEM EPA Qualitative		<input type="checkbox"/> TEM EPA Quantitative			
Asbestos Soils	<input type="checkbox"/> CARB 435 Prep Only		<input type="checkbox"/> CARB 435 PLM		<input type="checkbox"/> 400 PC		<input type="checkbox"/> 800 PC		<input type="checkbox"/> 1000 PC		<input type="checkbox"/> 1200 PC		<input type="checkbox"/> EPA Soil Screening Qualitative		<input type="checkbox"/> TEM-NOA EPA/CARB Quantitative		<input type="checkbox"/> Erionite	
Asbestos Dust	<input type="checkbox"/> ASTM D-5755 Fiber Count			<input type="checkbox"/> ASTM D-5756 Wt. %			<input type="checkbox"/> ASTM D-5756 Mass			<input type="checkbox"/> ASTM D-6480 Dust Wipe			<input type="checkbox"/> Total Particulates (Gravimetric)					
Asbestos Water	<input type="checkbox"/> 100.2 Potable Drinking Water			<input type="checkbox"/> 100.1 Non Potable Water			note that 100.2 will be used for all water samples unless otherwise requested											
Lead/Silica	<input type="checkbox"/> Lead Paint Chips EPA-SW-846 7000B		<input type="checkbox"/> Lead Dust Wipe EPA-SW-846 7000B		<input type="checkbox"/> Lead Air NIOSH 7082		<input type="checkbox"/> Lead Soil EPA-SW-846 7000B		<input type="checkbox"/> Crystalline Silica Air (NIOSH 7500) <input type="checkbox"/> Single Species <input type="checkbox"/> All Species		<input type="checkbox"/> Crystalline Silica in Bulk (NIOSH 7500) <input type="checkbox"/> Single Species <input type="checkbox"/> All Species		<input type="checkbox"/> Respirable Crystalline Silica in Bulk (NIOSH 7500) <input type="checkbox"/> Single Species <input type="checkbox"/> All Species					
Custom/Other	<input type="checkbox"/> Custom Analysis **						<input type="checkbox"/> TEM Chatfield (Semi-Quant)		<input type="checkbox"/> NIOSH 0500		<input type="checkbox"/> NIOSH 0600		<input type="checkbox"/> TTLC		<input type="checkbox"/> STLC		<input type="checkbox"/> TCLP	
Special Instruct.	<input type="checkbox"/> Composite		<input type="checkbox"/> Prep Only		<input type="checkbox"/> 8 Hour TWA		Other **											
Sample # *	Sample Type	Date Collected	Time On	Time Off	Total Time (min)	Flow Rate (lpm)			Volume or Area Sampled	Hold Sample	Description *							
						On	Off	Average										
1	Bulk	5/7/24								<input type="checkbox"/>	White Acoustic Ceiling Debris							
2	Bulk	5/8/24								<input type="checkbox"/>	Off White Debris							
3	Bulk	5/8/24								<input type="checkbox"/>	White Acoustic Ceiling Debris							
4	Bulk	5/8/24								<input type="checkbox"/>	White Acoustic Ceiling Debris							
5	Bulk	5/8/24								<input type="checkbox"/>	White Acoustic Ceiling Debris							
6	Bulk	5/8/24								<input type="checkbox"/>	Off White Debris							
										<input type="checkbox"/>	White Acoustic Ceiling Debris							
										<input type="checkbox"/>								
										<input type="checkbox"/>								
										<input type="checkbox"/>								
										<input type="checkbox"/>								
Submitted By * <i>Jeff Jeppson</i>		Received By <i>F. Brenner ATE</i>																
Date/Time Submitted * <i>5/8/24</i>		Date/Time Received <i>5/8/24 10:30 am</i>																
Submitted By		Received By																
Date/Time Submitted		Date/Time Received																

\*\* For any special instructions, RUSH results or Custom Analysis, you must clarify these specifications AND, of more importance, contact us here at ATEM ahead of time to manage scheduling to meet your requests. This includes dropping off samples for rush, same day analysis. Drop off and processing of samples after hours cannot be accommodated without proper notification from you, and confirmation by ATEM staff. All samples will be held for 3 months from the date of receipt at ATEM. Additional sample storage time may be obtained through ATEM Customer Service.



Bldg. B

125a

124

Loos

Mech. Room

120

Guest Laundry

Electrical Room

123

147

148

149

150

151

Existing 2-Hour Firewall

119

118

117

116

115

MATCH LINE

156

152

153

154

155

3

2

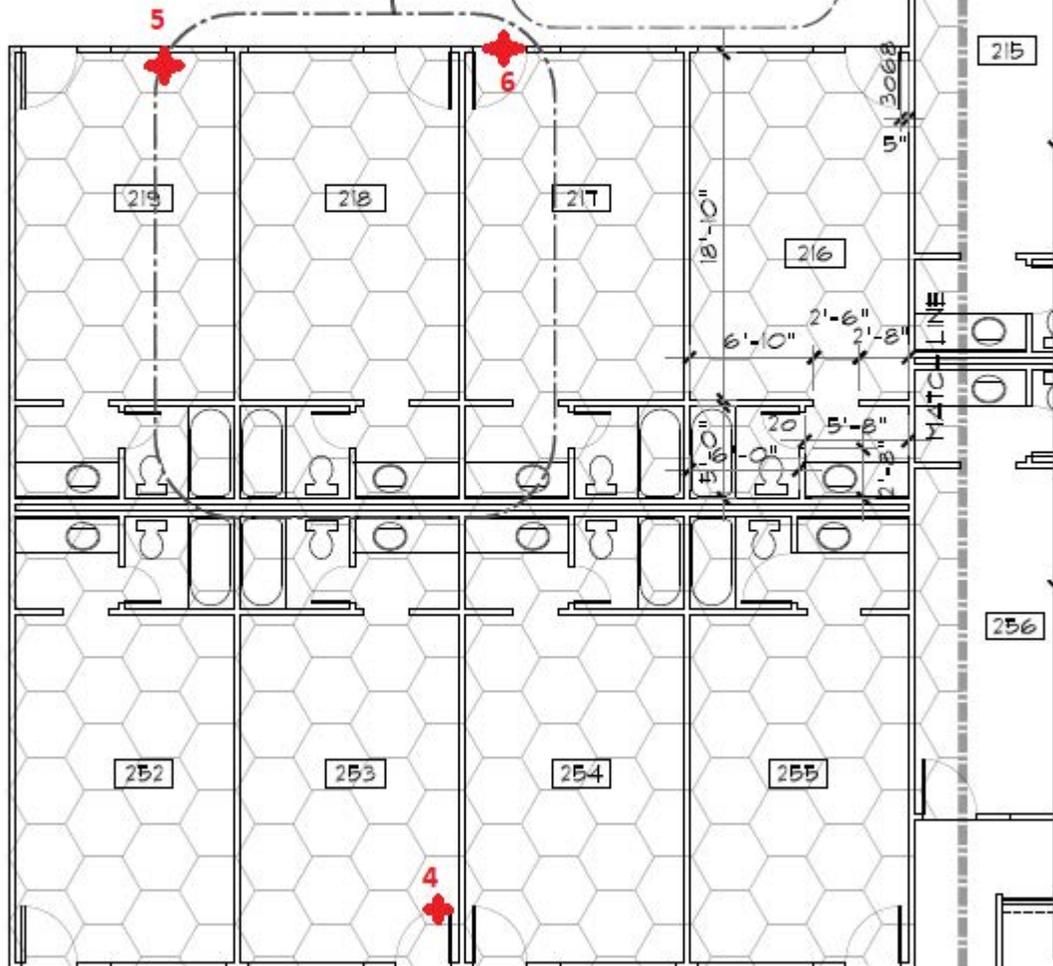
1

REPLACE EXISTING STAIRS



REFER TO 2/A.2d  
FOR ENLARGED FLOOR  
PLAN OF THIS AREA

Refer



215

256

# **Supporting Document 7**

**STOP WORK ORDER NO. 000010**

# NORTHERN NEVADA PUBLIC HEALTH AIR QUALITY MANAGEMENT DIVISION

1001 East Ninth Street, Suite B171  
Reno, Nevada 89512

## STOP WORK ORDER No. 000010 ISSUED TO

**Company Name: Saronic Investments, LLC**  
**Address: 3131 S. Virginia Street**  
**City and State: Sparks, Nevada 89502**  
**APN: 019-360-25**

The Northern Nevada Public Health Air Quality Management Division (AQMD) has identified noncompliance of District Board of Health Regulations Governing Air Quality Management that warrants the issuance of a Stop Work Order.

### I. BASIS for STOP WORK ORDER

#### A. Regulatory Authority for the Issuance of the Stop Work Order

1. The AQMD under authority of District Board of Health Regulations Governing Air Quality Management (DBOH Regulations) paragraph 020.000.A.2.c. has the power and duty to make such determinations and issue such orders as may be necessary to implement the provisions of the DBOH Regulations paragraph 020.000.A.2.a. to achieve air quality standards in accordance with law.
2. Pursuant to DBOH Regulations paragraph 020.100.B.2.b., *“a person served with a stop work order...may apply to the control officer for its revocation at any time, setting forth the facts upon which they believe that the reasons for the issuance of the stop work order no longer exist”*.

#### B. The facility has failed to comply with the following rules and regulations:

1. DBOH Regulations Section 030.107:
  - i. Asbestos Sampling and Notification
  - ii. Asbestos Control Work Practice
  - iii. Asbestos Contamination and Abatement
2. 40 CFR Part 61 Subpart M – National Emissions Standard for Asbestos
  - i. 61.145 Standard for demolition and renovation

## II. STOP WORK ORDER

- A. Pursuant to District Board of Health Regulations Governing Air Quality Management paragraph 020.100.B.2.a., *“a person served with a stop work order ...shall stop all activities specified in the stop work order as soon as safely practicable.”*
- B. Immediately cease all activities associated with the demolition and renovation at the facility address listed on this Stop Work Order which may be in violation of DBOH and Federal Clean Air Act Regulations to prevent endangerment of public health through asbestos contamination.

## III. APPEAL PROCEDURE AND TIME LIMITATIONS

### A. Appeal Procedure

Saronic Investments, LLC are advised that if they are aggrieved in any manner by the issuance or affirmance of this Stop Work Order may apply to the Control Officer for its revocation, setting forth the reasons the stop work order is no longer valid. Any person aggrieved by the issuance of affirmance of a stop work order may submit an appeal to the Air Pollution Control Hearing Board to review the actions of the Control Officer. The written petition for appeal shall be submitted within (10) working days of the receipt of this Stop Work Order on the provided form to the AQMD at the following address:

Northern Nevada Public Health  
Air Quality Management Division  
1001 East Ninth Street Suite B171  
Reno, Nevada 89512

Failure to submit a petition for appeal within the specified time will result in the Stop Work Order becoming final.

**IV. SIGNATURES**

5/8/2024  
Date

  
Joshua Restori  
Supervisor, Permitting and Compliance  
Air Quality Management Division  
Northern Nevada Public Health

5-8-2024  
Date

  
Francisco Vega, P.E., MBA  
Director  
Air Quality Management Division  
Northern Nevada Public Health

# **Supporting Document 8**

**ASBESTOS NESHAP NOTIFICATION OF  
RENOVATION FOR THE CLEANUP AND  
REMEDICATION OF ASBESTOS AT 3131 S.  
VIRGINIA STREET**

**FOR AQMD USE ONLY**

Fee Included? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO If "NO", date paid: Check # 1706	Postmark Date:	Notification Permit No.: ASD24-0366	AIR QUALITY MGMT. Date Received: MAY 21 2024 WASHOE COUNTY
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**ASBESTOS NESHAP NOTIFICATION OF DEMOLITION AND RENOVATION**



1. TYPE OF NOTIFICATION (Select One): <input checked="" type="checkbox"/> Original <input type="checkbox"/> Revision <input type="checkbox"/> Cancelled						
2. FACILITY OWNER INFORMATION						
Facility Owner Name: Saronic Investments LLC						
Address: 3650 Auburn Blvd STE B100						
City: Sacramento		State: CA	ZIP Code: 95821			
Contact Name:						
Phone Number:		Email:				
3. CONTRACTOR INFORMATION (Select One): <input type="checkbox"/> General <input type="checkbox"/> Demolition <input checked="" type="checkbox"/> Asbestos Removal						
Company Name: All Eagle, LLC						
Address: 4865 Joule St						
City: Reno		State: NV	ZIP Code: 89509			
Contact Name: Jolene Aleck						
Phone Number: 775-400-8290		Email: office@alleaglellc.com				
4. CONTRACTOR INFORMATION (Select One): <input type="checkbox"/> General <input type="checkbox"/> Demolition <input type="checkbox"/> Asbestos Removal <input checked="" type="checkbox"/> Asbestos Consultant						
Company Name: C&G Environmental						
Address: 665 Nancy Cir						
City: Reno		State: NV	ZIP Code: 89503			
Contact Name: Gene Johnson						
Phone Number: 775-338-2508		Email: candgenviro@gmail.com				
5. TYPE OF OPERATION (Select One): <input type="checkbox"/> Demolition <input type="checkbox"/> Ordered Demolition <input checked="" type="checkbox"/> Renovation <input type="checkbox"/> Emergency Renovation						
6. FACILITY DESCRIPTION (Include building number, unit number, floor, and room number as applicable)						
Facility Building Name (if applicable): Vagabon Inn						
Address: 3131 S Virginia St			Assessor's Parcel No.: 019-360-25			
City: Reno		State: NV	ZIP Code: 89502			
On-Site Location Description: Motel						
Building Size: 4058		No. of Floors: 2	Age in Years: 49			
Present/Intended Use: <input checked="" type="checkbox"/> Commercial <input type="checkbox"/> Multi-Family <input type="checkbox"/> Residential		Prior Use: <input checked="" type="checkbox"/> Commercial <input type="checkbox"/> Multi-Family <input type="checkbox"/> Residential				
7. IS ASBESTOS PRESENT? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No						
8. PROCEDURE USED TO DETECT THE PRESENCE OR ABSENCE OF ASBESTOS: <input checked="" type="checkbox"/> PLM OR <input type="checkbox"/> ASSUMED						
9. NOTE THE TYPE AND QUANTITY OF ASBESTOS THAT WILL BE REMOVED AND/OR REMAIN IN PLACE.		RACM TO BE REMOVED	NON-FRIABLE ACM TO BE REMOVED		NON-FRIABLE ACM NOT TO BE REMOVED	
			Cat I	Cat II	Cat I	Cat II
Pipes (linear ft.):						
Surface Area (sq. ft.): See attached description		15,677				
Vol RACM off Facility Component (cubic ft.):						
10. SCHEDULED DATES OF ASBESTOS REMOVAL (mm/dd/yy)			Start: 5/22/2024		Complete: 6/11/2024	
11. SCHEDULED DATES OF DEMOLITION (mm/dd/yy)			Start:		Complete:	

**A NESHAP Notification is valid for one year (365 calendar days) from the original start date. If the project is not complete within one year, a new NESHAP Notification must be submitted to the AQMD at least (10) working days prior to the expiration date.**

<b>12. DESCRIPTION OF PLANNED DEMOLITION OR RENOVATION WORK, AND METHODS TO BE USED:</b> Removal of materials using wet and manual methods.			
<b>13. DESCRIPTION OF WORK PRACTICES AND ENGINEERING CONTROLS TO BE USED TO PREVENT EMISSIONS OF ASBESTOS AT THE DEMOLITION AND/OR RENOVATION SITE:</b> Full containment, decon stations, hepa vac, negative air pressure and PPE			
<b>14. WASTE TRANSPORTER INFORMATION</b>			
Company Name: All Eagle, LLC			
Address: 4865 Joule St #C3			
City: Reno	State: NV	ZIP Code: 89502	
Contact Name: Teresa Ruiz deSide			
Phone Number: 775-400-8290		Email: office@alleaglellc.com	
<b>15. WASTE DISPOSAL SITE INFORMATION</b>			
Name: Lockwood Regional Landfill			
Address: 2401 Canyon Way			
City: Sparks	State: NV	ZIP Code: 89421	
Contact Name:			
Phone Number:		Email:	
<b>16. IF DEMOLITION WAS ORDERED BY A GOVERNMENT AGENCY, IDENTIFY THE AGENCY BELOW:</b>			
Agency Name:			
Contact Name:		Title:	
Date of order (mm/dd/yy):		Date ordered to begin (mm/dd/yy):	
<b>17. FOR EMERGENCY RENOVATIONS:</b>			
Date and hour of emergency (mm/dd/yy - HH:MM): 5-10-2024 10am			
Description of sudden, unexpected event: Friable accoustic ceiling materials were disturbed in 17 rooms. Creating surface dust and debris removed inappropriately.			
Explanation of how the event caused unsafe conditions, or would cause equipment damage or an unreasonable financial burden: Due to the disturbance it created surface dust and debris was found in a multiple areas creating an unsafe environment for the public.			
<b>18. DESCRIPTION OF THE PROCEDURES TO BE FOLLOWED IN THE EVENT THAT UNEXPECTED ASBESTOS IS FOUND OR PREVIOUSLY NONFRIABLE ASBESTOS MATERIAL BECOMES CRUMBLED, PULVERIZED, OR REDUCED TO POWDER:</b> Stop work and notify a hygienist.			
<b>19. I certify that an individual trained in the provisions of this regulation (40 CFR Part 61, Subpart M) will be on-site during the demolition or renovation and evidence that the required training has been accomplished by this person will be available for inspection during normal business hours.</b>			
<u>MAX CARDENAS</u> Owner / Operator Printed Name	<u>V.P. E.P.E</u> Title	<u>[Signature]</u> Owner / Operator Wet Signature	<u>5/20/24</u> Date
<b>20. Certification of AHERA (Asbestos Hazard Emergency Response Act) Training.</b>			
_____	_____	_____	_____
Printed Name	Affiliation	AHERA Certificate No.	Expiration Date
<b>21. I certify that the above information is correct.</b>			
<u>MAX CARDENAS</u> Owner / Operator Printed Name	<u>V.P. E.P.E</u> Title	<u>[Signature]</u> Owner / Operator Wet Signature	<u>5/20/24</u> Date

# **Supporting Document 9**

**NOTICE OF VIOLATION NO. AQMV25-0003**

NORTHERN NEVADA PUBLIC HEALTH  
AIR QUALITY MANAGEMENT DIVISION  
1001 East Ninth Street Suite B171  
Reno, Nevada 89512

## **NOTICE OF VIOLATION No: AQMV25-0003**

### **ISSUED TO**

**Owner: Saronic Investments, LLC**  
**Location: 3131 S Virginia St, Reno, NV 89502, APN 019-360-25**  
**Date of Issuance: March 17, 2025**  
**Case No.: 1511**

Northern Nevada Public Health Air Quality Management Division (AQMD) has determined that Saronic Investments, LLC is in violation of the District Board of Health Regulations Governing Air Quality Management PART 030.050 – NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS.

#### 1. VIOLATION

- A. Failure to thoroughly inspect the affected facility or part of the facility where the renovation operation will occur for the presence of asbestos as required by 40 CFR 61.145(a) Applicability.

#### 2. BASIS OF VIOLATION

- A. Regulatory Authority  
The District Board of Health Regulations Governing Air Quality Management PART 030.050, incorporate by reference, 40 CFR 61, Subpart M – National Emissions Standard for Asbestos and has been delegated authority to implement and ensure compliance with this Subpart within Washoe County.

Per 40 CFR 61, Subpart M – National Emission Standards for Asbestos §61.145 Standards for demolition and renovation (a) Applicability:

(a) Applicability. To determine which requirements of paragraphs (a), (b), and (c) of this section apply to the owner or operator of a demolition or renovation activity and prior to the commencement of the demolition or renovation, thoroughly inspect the affected facility or part of the facility where the demolition or renovation operation will occur for the presence of asbestos, including Category I and Category II nonfriable ACM. The requirements of paragraphs (b) and (c) of this section apply to each owner or operator of a demolition or renovation activity, including the removal of RACM as follows:

(4) In a facility being renovated, including any individual nonscheduled renovation operation, all the requirements of paragraphs (b) and (c) of this section apply if the combined amount of RACM to be stripped, removed, dislodged, cut, drilled, or similarly disturbed is

(i) At least 80 linear meters (260 linear feet) on pipes or at least 15 square meters (160 square feet) on other facility components, or



(ii) At least 1 cubic meter (35 cubic feet) off facility components where the length or area could not be measured previously.

(iii) To determine whether paragraph (a)(4) of this section applies to planned renovation operations involving individual nonscheduled operations, predict the combined additive amount of RACM to be removed or stripped during a calendar year of January 1 through December 31.

(iv) To determine whether paragraph (a)(4) of this section applies to emergency renovation operations, estimate the combined amount of RACM to be removed or stripped as a result of the sudden, unexpected event that necessitated the renovation.

B. Facts to Constitute the Violation

On May 7, 2024, the AQMD found that during the course of remodel activities, suspect asbestos containing materials had been disturbed and removed from the facility situated at 3131 S. Virginia Street in Reno, Nevada. The AQMD contacted the property owner who stated that there was no asbestos in the renovation area. On May 8, 2024, the AQMD collected samples of debris from the renovation area, sent the samples to accredited asbestos laboratory and confirmed the presence of disturbed asbestos containing materials in the remodel activities.

3. APPEAL PROCEDURE AND TIME LIMITATIONS

A. Appeal Procedure

Saronic Investments, LLC is advised that within (10) working days of the receipt of this Notice of Violation, Saronic Investments, LLC may submit a written petition for appeal to the Northern Nevada Public Health - Air Quality Hearing Board. The written petition for appeal shall be submitted to the AQMD at the following address:

Northern Nevada Public Health  
Air Quality Management Division  
1001 East Ninth Street Suite B171  
Reno, Nevada 89512

Failure to submit a petition for appeal within the specified timeframe will result in the submission of this Notice of Violation to the Northern Nevada Public Health - District Board of Health with a recommendation for the assessment of an administrative fine of \$10,000.00.

3/17/25

Date

Joshua Restori  
Supervisor, Permitting and Compliance  
Air Quality Management Division  
Northern Nevada Public Health

# **Supporting Document 10**

**NOTICE OF VIOLATION NO. AQMV25-0004**

NORTHERN NEVADA PUBLIC HEALTH  
AIR QUALITY MANAGEMENT DIVISION  
1001 East Ninth Street Suite B171  
Reno, Nevada 89512

## NOTICE OF VIOLATION No: AQMV25-0004 ISSUED TO

**Owner: Saronic Investments, LLC**  
**Location: 3131 S Virginia St, Reno, NV 89502, APN 019-360-25**  
**Date of Issuance: March 17, 2025**  
**Case No.: 1511**

Northern Nevada Public Health Air Quality Management Division (AQMD) has determined that Saronic Investments, LLC is in violation of the District Board of Health Regulations Governing Air Quality Management PART 030.050 – NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS.

### 1. VIOLATION

- A. Failure to provide written notice 10-working days in advance to the AQMD of the intention to renovate as required by 40 CFR 61.145(b) Notification Requirements.

### 2. BASIS OF VIOLATION

- A. Regulatory Authority  
The District Board of Health Regulations Governing Air Quality Management PART 030.050, incorporate by reference, 40 CFR 61, Subpart M – National Emissions Standard for Asbestos and has been delegated authority to implement and ensure compliance with this Subpart within Washoe County.

Per 40 CFR. 61, Subpart M – National Emission Standards for Asbestos §61.145 Standards for demolition and renovation (a) Applicability

(4) In a facility being renovated, including any individual nonscheduled renovation operation, all the requirements of paragraph (b) (Notification requirements) and (c) (Procedures for asbestos emission control) of this section apply if the combined amount of RACM to be stripped, removed, dislodged, cut, drilled, or similarly disturbed is

- (i) At least 80 linear meters (260 linear feet) on pipes or at least 15 square meters (160 square feet) on other facility components.
- (ii) At least 1 cubic meter (35 cubic feet) off facility components where the length or area could not be measured previously.

(b) Notification requirements. Each owner or operator of a demolition or renovation activity to which this section applies shall:



(1) Provide the Administrator with written notice of intention to demolish or renovate. Delivery of the notice by U.S. Postal Service, commercial delivery service, or hand delivery is acceptable.

(2) Update notice, as necessary, including when the amount of asbestos affected changes by at least 20 percent.

(3) Postmark or deliver the notice as follows:

(i) At least 10 working days before asbestos stripping or removal work or any other activity begins (such as site preparation that would break up, dislodge or similarly disturb asbestos material), if the operation is described in paragraphs (a) (1) and (4) (except (a)(4)(iii) and (a)(4)(iv)) of this section. If the operation is as described in paragraph (a)(2) of this section, notification is required 10 working days before demolition begins.

B. Facts to Constitute the Violation

On May 7, 2024, the AQMD found that asbestos containing materials had been disturbed and removed from the facility situated at 3131 S. Virginia Street in Reno, Nevada. Based on the amount of material disturbed and removed, a 10-working day notification of intention to renovate required by 40 CFR 61.145(b) was required and had not been submitted to the AQMD prior to the asbestos containing material disturbance.

3. APPEAL PROCEDURE AND TIME LIMITATIONS

A. Appeal Procedure

Saronic Investments, LLC is advised that within (10) working days of the receipt of this Notice of Violation, Saronic Investments, LLC may submit a written petition for appeal to the Northern Nevada Public Health - Air Quality Hearing Board. The written petition for appeal shall be submitted to the AQMD at the following address:

Northern Nevada Public Health  
Air Quality Management Division  
1001 East Ninth Street Suite B171  
Reno, Nevada 89512

Failure to submit a petition for appeal within the specified timeframe will result in the submission of this Notice of Violation to the Northern Nevada Public Health - District Board of Health with a recommendation for the assessment of an administrative fine of \$5,000.00.

3/17/25  
Date

A handwritten signature in blue ink, appearing to read "Joshua Restori", is written over a horizontal line.

Joshua Restori  
Supervisor, Permitting and Compliance  
Air Quality Management Division  
Northern Nevada Public Health

# **Supporting Document 11**

**NOTICE OF VIOLATION NO. AQMV25-0005**

NORTHERN NEVADA PUBLIC HEALTH  
AIR QUALITY MANAGEMENT DIVISION  
1001 East Ninth Street Suite B171  
Reno, Nevada 89512

**NOTICE OF VIOLATION No: AQMV25-0005**  
**ISSUED TO**

**Owner: Saronic Investments, LLC**  
**Location: 3131 S Virginia St, Reno, NV 89502, APN 019-360-25**  
**Date of Issuance: March 17, 2025**  
**Case No.: 1511**

Northern Nevada Public Health Air Quality Management Division (AQMD) has determined that Saronic Investments, LLC is in violation of the District Board of Health Regulations Governing Air Quality Management PART 030.050 – NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS.

1. VIOLATION

- A. Failure to follow proper procedures for asbestos emission control as required by 40 CFR 61.145(c)(6) Procedures for asbestos emission control.

2. BASIS OF VIOLATION

- A. Regulatory Authority  
The District Board of Health Regulations Governing Air Quality Management PART 030.050, incorporate by reference, 40 CFR 61, Subpart M – National Emissions Standard for Asbestos and has been delegated authority to implement and ensure compliance with this Subpart within Washoe County.

Per 40 CFR 61, Subpart M – National Emission Standards for Asbestos §61.145 Standards for demolition and renovation (c) Procedures for asbestos emission control:

(c) Procedures for asbestos emission control. Each owner or operator of a demolition or renovation activity to whom this paragraph applies, according to paragraph (a) of this section, shall comply with the following procedures:

(6) For all RACM, including material that has been removed or stripped:

(i) Adequately wet the material and ensure that it remains wet until collected and contained or treated in preparation for disposal in accordance with § 61.150; and

(ii) Carefully lower the material to the ground and floor, not dropping, throwing, sliding, or otherwise damaging or disturbing the material.



(iii) Transport the material to the ground via leak-tight chutes or containers if it has been removed or stripped more than 50 feet above ground level and was not removed as units or in sections.

(iv) RACM contained in leak-tight wrapping that has been removed in accordance with paragraphs (c)(4) and (c)(3)(i)(B)(3) of this section need not be wetted.

B. Facts to Constitute the Violation

On May 7, 2024, the AQMD found that asbestos containing materials had been disturbed and removed from the facility situated at 3131 S. Virginia Street in Reno, Nevada.

Improper procedures used for the removal resulted in the contamination of renovation site, common areas on the property, construction waste dumpster, and other areas inside and on the exterior of the building at 3131 S. Virginia Street. The asbestos containing materials were removed improperly and openly transported from the suite to an open dumpster in the parking lot of the facility. None of the materials were removed with adequate moisture or contained and transported in leak-tight wrapping or deposited in a regulated landfill accepting regulated asbestos containing material waste.

3. APPEAL PROCEDURE AND TIME LIMITATIONS

A. Appeal Procedure

Saronic Investments, LLC is advised that within (10) working days of the receipt of this Notice of Violation, Saronic Investments, LLC may submit a written petition for appeal to the Northern Nevada Public Health - Air Quality Hearing Board. The written petition for appeal shall be submitted to the AQMD at the following address:

Northern Nevada Public Health  
Air Quality Management Division  
1001 East Ninth Street Suite B171  
Reno, Nevada 89512

Failure to submit a petition for appeal within the specified timeframe will result in the submission of this Notice of Violation to the Northern Nevada Public Health - District Board of Health with a recommendation for the assessment of an administrative fine of \$40,000.00.

3/17/25  
Date

A handwritten signature in blue ink, which appears to read "Joshua C. Restori", is written over a horizontal line.

Joshua Restori  
Supervisor, Permitting and Compliance  
Air Quality Management Division  
Northern Nevada Public Health

# **Supporting Document 12**

**NOTICE OF VIOLATION NO. AQMV25-0006**

NORTHERN NEVADA PUBLIC HEALTH  
AIR QUALITY MANAGEMENT DIVISION  
1001 East Ninth Street Suite B171  
Reno, Nevada 89512

## NOTICE OF VIOLATION No: AQMV25-0006 ISSUED TO

**Owner: Saronic Investments, LLC**  
**Location: 3131 S Virginia St, Reno, NV 89502, APN 019-360-25**  
**Date of Issuance: March 17, 2025**  
**Case No.: 1511**

Northern Nevada Public Health Air Quality Management Division (AQMD) has determined that Saronic Investments, LLC is in violation of the District Board of Health Regulations Governing Air Quality Management PART 030.050 – NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS.

### 1. VIOLATION

- A. Failure to have at least one on-site representative trained in the provisions of 40 CFR 61 Subpart M onsite at the time of renovation as required by 40 CFR 61.145(c)(8).

### 2. BASIS OF VIOLATION

- A. Regulatory Authority  
The District Board of Health Regulations Governing Air Quality Management PART 030.050, incorporate by reference, 40 CFR 61, Subpart M – National Emissions Standard for Asbestos and has been delegated authority to implement and ensure compliance with this Subpart within Washoe County.

Per 40 CFR 61, Subpart M – National Emission Standards for Asbestos §61.145 Standards for demolition and renovation(c) Procedures for asbestos emission control:

(c) Procedures for asbestos emission control. Each owner or operator of a demolition or renovation activity to whom this paragraph applies, according to paragraph (a) of this section, shall comply with the following procedures:

(8) Effective 1 year after promulgation of this regulation, no RACM shall be stripped, removed, or otherwise handled or disturbed at a facility regulated by this section unless at least one on-site representative, such as a foreman or management-level person or other authorized representative, trained in the provisions of this regulation and the means of complying with them, is present. Every 2 years, the trained on-site individual shall receive refresher training in the provisions of this regulation. The required training shall include as a minimum: applicability; notifications; material identification; control procedures for removals including, at least, wetting, local exhaust ventilation, negative pressure enclosures, glove-bag procedures, and High Efficiency Particulate Air (HEPA) filters; waste disposal work practices; reporting and recordkeeping; and asbestos hazards and worker protection.



Evidence that the required training has been completed shall be posted and made available for inspection by the Administrator at the demolition or renovation site.

B. Facts to Constitute the Violation

On May 7, 2024, the AQMD found that asbestos containing materials had been disturbed and removed from the facility situated at 3131 S. Virginia Street in Reno, Nevada.

Based on the investigation by the AQMD, the removal of the asbestos containing materials during the course of the renovation was completed by personnel who were not trained in the provisions of 40 CFR 61 Subpart M. No people trained in the provisions of 40 CFR 61 Subpart M were onsite at the time of the asbestos containing material disturbance or removal.

3. APPEAL PROCEDURE AND TIME LIMITATIONS

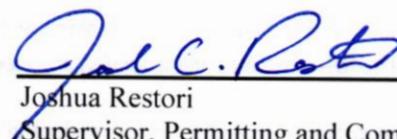
A. Appeal Procedure

Saronic Investments, LLC is advised that within (10) working days of the receipt of this Notice of Violation, Saronic Investments, LLC may submit a written petition for appeal to the Northern Nevada Public Health - Air Quality Hearing Board. The written petition for appeal shall be submitted to the AQMD at the following address:

Northern Nevada Public Health  
Air Quality Management Division  
1001 East Ninth Street Suite B171  
Reno, Nevada 89512

Failure to submit a petition for appeal within the specified timeframe will result in the submission of this Notice of Violation to the Northern Nevada Public Health - District Board of Health with a recommendation for the assessment of an administrative fine of \$10,000.00.

3/17/25  
Date

  
Joshua Restori  
Supervisor, Permitting and Compliance  
Air Quality Management Division  
Northern Nevada Public Health

# **Supporting Document 13**

**NOTICE OF VIOLATION NO. AQMV25-0007**

NORTHERN NEVADA PUBLIC HEALTH  
AIR QUALITY MANAGEMENT DIVISION  
1001 East Ninth Street Suite B171  
Reno, Nevada 89512

**NOTICE OF VIOLATION No: AQMV25-0007**  
**ISSUED TO**

**Owner: Saronic Investments, LLC**  
**Location: 3131 S Virginia St, Reno, NV 89502, APN 019-360-25**  
**Date of Issuance: March 17, 2025**  
**Case No.: 1511**

Northern Nevada Public Health Air Quality Management Division (AQMD) has determined that Saronic Investments, LLC is in violation of the District Board of Health Regulations Governing Air Quality Management PART 030.050 – NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS.

1. VIOLATION

- A. Failure to properly dispose of asbestos waste in accordance with the provisions of 40 CFR 61.150 Standard for waste disposal for manufacturing, fabricating, demolition, renovation, and spraying.

2. BASIS OF VIOLATION

- A. Regulatory Authority  
The District Board of Health Regulations Governing Air Quality Management PART 030.050, incorporate by reference, 40 CFR 61, Subpart M – National Emissions Standard for Asbestos and has been delegated authority to implement and ensure compliance with this Subpart within Washoe County.

Per 40 CFR 61, Subpart M – National Emission Standards for Asbestos §61.150 Standard for waste disposal for manufacturing, fabricating, demolition, renovation, and spraying operations:

Each owner or operator of any source covered under the provisions of §§ 61.144, 61.145, 61.146, and 61.147 shall comply with the following provisions:

(a) Discharge no visible emissions to the outside air during the collection, processing (including incineration), packaging, or transporting of any asbestos-containing waste material generated by the source, or use one of the emission control and waste treatment methods specified in paragraphs (a) (1) through (4) of this section.

(1) Adequately wet asbestos-containing waste material as follows:

- (i) Mix control device asbestos waste to form a slurry; adequately wet other asbestos-containing waste material; and
  - (ii) Discharge no visible emissions to the outside air from collection, mixing, wetting, and handling operations, or use the methods specified by § 61.152 to clean emissions containing particulate asbestos material before they escape to, or are vented to, the outside air; and
  - (iii) After wetting, seal all asbestos-containing waste material in leak-tight containers while wet; or, for materials that will not fit into containers without additional breaking, put materials into leak-tight wrapping; and
  - (iv) Label the containers or wrapped materials specified in paragraph (a)(1)(iii) of this section using warning labels specified by Occupational Safety and Health Standards of the Department of Labor, Occupational Safety and Health Administration (OSHA) under 29 CFR 1910.1001(j)(4) or 1926.1101(k)(8). The labels shall be printed in letters of sufficient size and contrast so as to be readily visible and legible.
  - (v) For asbestos-containing waste material to be transported off the facility site, label containers or wrapped materials with the name of the waste generator and the location at which the waste was generated.
- (2) Process asbestos-containing waste material into nonfriable forms as follows:
- (i) Form all asbestos-containing waste material into nonfriable pellets or other shapes;
  - (ii) Discharge no visible emissions to the outside air from collection and processing operations, including incineration, or use the method specified by § 61.152 to clean emissions containing particulate asbestos material before they escape to, or are vented to, the outside air.
- (3) For facilities demolished where the RACM is not removed prior to demolition according to §§ 61.145(c)(1) (i), (ii), (iii), and (iv) or for facilities demolished according to § 61.145(c)(9), adequately wet asbestos-containing waste material at all times after demolition and keep wet during handling and loading for transport to a disposal site. Asbestos-containing waste materials covered by this paragraph do not have to be sealed in leak-tight containers or wrapping but may be transported and disposed of in bulk.
- (4) Use an alternative emission control and waste treatment method that has received prior approval by the Administrator according to the procedure described in § 61.149(c)(2).

(5) As applied to demolition and renovation, the requirements of paragraph (a) of this section do not apply to Category I nonfriable ACM waste and Category II nonfriable ACM waste that did not become crumbled, pulverized, or reduced to powder.

(b) All asbestos-containing waste material shall be deposited as soon as is practical by the waste generator at:

(1) A waste disposal site operated in accordance with the provisions of § 61.154, or

(2) An EPA-approved site that converts RACM and asbestos-containing waste material into nonasbestos (asbestos-free) material according to the provisions of § 61.155.

(3) The requirements of paragraph (b) of this section do not apply to Category I nonfriable ACM that is not RACM.

(c) Mark vehicles used to transport asbestos-containing waste material during the loading and unloading of waste so that the signs are visible. The markings must conform to the requirements of §§ 61.149(d)(1) (i), (ii), and (iii).

(d) For all asbestos-containing waste material transported off the facility site:

(1) Maintain waste shipment records, using a form similar to that shown in Figure 4, and include the following information:

(i) The name, address, and telephone number of the waste generator.

(ii) The name and address of the local, State, or EPA Regional office responsible for administering the asbestos NESHAP program.

(iii) The approximate quantity in cubic meters (cubic yards).

(iv) The name and telephone number of the disposal site operator.

(v) The name and physical site location of the disposal site.

(vi) The date transported.

(vii) The name, address, and telephone number of the transporter(s).

(viii) A certification that the contents of this consignment are fully and accurately described by proper shipping name and are classified, packed, marked, and labeled, and are in all



respects in proper condition for transport by highway according to applicable international and government regulations.

(2) Provide a copy of the waste shipment record, described in paragraph (d)(1) of this section, to the disposal site owners or operators at the same time as the asbestos-containing waste material is delivered to the disposal site.

(3) For waste shipments where a copy of the waste shipment record, signed by the owner or operator of the designated disposal site, is not received by the waste generator within 35 days of the date the waste was accepted by the initial transporter, contact the transporter and/or the owner or operator of the designated disposal site to determine the status of the waste shipment.

(4) Report in writing to the local, State, or EPA Regional office responsible for administering the asbestos NESHAP program for the waste generator if a copy of the waste shipment record, signed by the owner or operator of the designated waste disposal site, is not received by the waste generator within 45 days of the date the waste was accepted by the initial transporter. Include in the report the following information:

(i) A copy of the waste shipment record for which a confirmation of delivery was not received, and

(ii) A cover letter signed by the waste generator explaining the efforts taken to locate the asbestos waste shipment and the results of those efforts.

(5) Retain a copy of all waste shipment records, including a copy of the waste shipment record signed by the owner or operator of the designated waste disposal site, for at least 2 years.

(e) Furnish upon request, and make available for inspection by the Administrator, all records required under this section.

**B. Facts to Constitute the Violation**

On May 7, 2024, the AQMD found that asbestos containing materials removed from the facility situated at 3131 S. Virginia Street in Reno, Nevada had been improperly disposed of in an open construction debris dumpster. Visible emissions of asbestos containing materials were observed from improper removal and disposal.

**3. APPEAL PROCEDURE AND TIME LIMITATIONS**

**A. Appeal Procedure**

Saronic Investments, LLC is advised that within (10) working days of the receipt of this Notice of Violation, Saronic Investments, LLC may submit a written petition for appeal to the



Northern Nevada Public Health - Air Quality Hearing Board. The written petition for appeal shall be submitted to the AQMD at the following address:

Northern Nevada Public Health  
Air Quality Management Division  
1001 East Ninth Street Suite B171  
Reno, Nevada 89512

Failure to submit a petition for appeal within the specified timeframe will result in the submission of this Notice of Violation to the Northern Nevada Public Health - District Board of Health with a recommendation for the assessment of an administrative fine of \$40,000.00.

3/17/25  
Date

A handwritten signature in blue ink, appearing to read "Joshua C. Restori", is written over a horizontal line.

Joshua Restori  
Supervisor, Permitting and Compliance  
Air Quality Management Division  
Northern Nevada Public Health

# **Supporting Document 14**

## **ADMINISTRATIVE PENALTY TABLE**

# Administrative Penalty Table

## Air Quality Management Division Washoe County Health District

### I. Minor Violations - Section 020.100.A.3.c.

Regulation		1st Violation	2nd Violation
040.030	Dust Control	500	1000
040.035	Open Burning	500	1000
040.040	Fire Set for Training	500	1000
040.050	Incinerator Emissions	500	1000
040.051	Wood-burning Devices	500	1000
040.055	Odorous Emissions	500	1000
040.080	Gasoline Transfer and Dispensing	500	1000
040.200	Diesel Engine Idling	500	1000
050.001	Emergency Episode Plan	500	1000

### II. Major Violations - Section 020.100.A.3.a.

Regulation	Violation	Source Category	
		Minimum	Maximum
030.000	Construction/Operating without Permit (per major process system or unit/day)	5000	10000
030.1402	Failure to Comply with Stop Work Order	10,000/day	10,000/day
030.2175	Operation Contrary to Permit Conditions (per day or event)	2500	10000
030.235	Failure to Conduct Source Test or Report (per Reporting Period for Each Unit)	2500	5000
	All other Major Violations (per day or event)	5000	10000

### III. Major Violations - Section 030.107 Asbestos

A. Asbestos Sampling & Notification	\$ 2,000 - \$10,000
B. Asbestos Control Work Practices (per day or event)	\$ 2,000 - \$10,000
C. Asbestos Containment & Abatement (per day or event)	\$ 5,000 - \$10,000

# **Supporting Document 15**

## **RECOMMENDED PENALTY CALCULATION WORKSHEET**

**Northern Nevada Public Health  
Air Quality Management Division  
Recommended Penalty Calculation Worksheet**

Company Name Saronic Investments, LLC  
Contact Name Michael Bathla  
Case Number 1511

I. Violation of Section 40 CFR 61, Subpart M 61.145(a)

**I. Recommended Penalty** = \$ 10000.00

II. Violation of Section 40 CFR 61, Subpart M 61.145(b)

**II. Recommended Penalty** = \$ 5000.00

III. Violation of Section 40 CFR 61, Subpart M 61.145(c)(6)

**III. Recommended Penalty** = \$ 40000.00

IV. Violation of Section 40 CFR 61, Subpart M 61.145(c)(8)

**IV. Recommended Penalty** = \$ 10000.00

V. Violation of Section 40 CFR 61, Subpart M 61.150

**V. Recommended Penalty** = \$ 40000.00

**Total Recommended Penalty** = \$ 105,000.00

  
\_\_\_\_\_  
Senior AQ Specialist/Supervisor

3/17/25  
\_\_\_\_\_  
Date

**Northern Nevada Public Health  
Air Quality Management Division  
Recommended Penalty Calculation Worksheet**

Company Name Saronic Investments, LLC  
 Contact Name Michael Bathla  
 Case Number 1511  
 Violation Number AQMV25-0003

Violation of Section 40 CFR 61, Subpart M 61.145(a)  
 Permit Condition N/A

**I. Base Penalty as specified in the Penalty Table** = \$ **5,000.00**

**II. Severity of Violation**

**A. Public Health Impact**

**1. Toxicity of Release** (For Emissions Exceedances)

Unable to Quantify - 1x      Criteria Pollutant - 1x      Hazardous Air Pollutant - 2x  
**Adjustment Factor** **2**

**Comment:** Asbestos Fibers are a Hazardous Air Pollutant

**2. Environmental/Public Health Risk** (Proximity to sensitive environment or group)

Negligible - 1x    Moderate - 1.5x    Significant - 2x  
**Adjustment Factor** **1.0**

**Comment:** Negligible Risk

Total Adjustment Factors (1 x 2) = **2**

**B. Adjusted Base Penalty**

Base Penalty \$ 5,000.00 x Adjustment Factor 2 = \$ **10,000.00**

**C. Number of Days/Weeks/Months or Units in Violation**

Adjusted Penalty \$ 10,000.00 x Number of Days/Weeks/Mo **1** = \$ **10,000.00**

**Comment:** (1) Incident of failing to conduct a thorough asbestos survey

**D. Economic Benefit**

Avoided Costs \$ **0.00** + Delayed Costs \$ **0.00** = \$ 0.00

**Comment:** N/A

**Penalty Subtotal**

Adjusted Base Penalty \$ 10,000.00 + Economic Benefit \$ 0.00 = \$ **10,000.00**

**Northern Nevada Public Health  
Air Quality Management Division  
Recommended Penalty Calculation Worksheet**

**III. Penalty Adjustment Consideration**

**A. Mitigating Factors** (0 +/- 25%)

0%

Comment N/A

**B. Compliance History**

Similar Violation < 12 months (300%)

+ 0%

Similar Violation < 3 years (200%)

+ 0%

Similar Violation > 3 years (150%)

+ 0%

Previous Unrelated Violations < 5years

5% x   , # of previous violations

+ 0%

Comment: \_\_\_\_\_

**Total Penalty Adjustment Factors** – Sum of A & B

0%

**IV. Recommended Penalty**

Penalty Adjustment:

\$ 10,000.00	x	<u>0%</u>		= \$	<span style="border: 1px solid black; padding: 2px;">0.00</span>
Penalty Subtotal (From Section II)		Total Adjustment Factors (From Section III)			Total Adjustment Value

Additional Credit for Environmental Investment/Training - \$   

Comment: \_\_\_\_\_

Adjusted Penalty:

\$ 10,000.00	+/-	<u>\$ 0.00</u>	=	\$	<span style="border: 1px solid black; padding: 2px;">10,000.00</span>
Penalty Subtotal (From Section II)		Total Adjustment Value (From Section III + Credit)			Recommended Penalty

  
Senior AQ Specialist/Supervisor

3/17/25  
Date

**Northern Nevada Public Health  
Air Quality Management Division  
Recommended Penalty Calculation Worksheet**

Company Name Saronic Investments, LLC  
 Contact Name Michael Bathla  
 Case Number 1511  
 Violation Number AQMV25-0004  
 Violation of Section 40 CFR 61, Subpart M 61.145(b)  
 Permit Condition N/A

**I. Base Penalty as specified in the Penalty Table** = \$ **5,000.00**

**II. Severity of Violation**

**A. Public Health Impact**

**1. Toxicity of Release** (For Emissions Exceedances)

Unable to Quantify - 1x      Criteria Pollutant - 1x      Hazardous Air Pollutant - 2x  
 Adjustment Factor **1**

**Comment:** Administrative Requirement (Unable to Quantify)

**2. Environmental/Public Health Risk** (Proximity to sensitive environment or group)

Negligible - 1x   Moderate - 1.5x   Significant - 2x      Adjustment Factor **1.0**

**Comment:** Negligible Risk

Total Adjustment Factors (1 x 2) = **1**

**B. Adjusted Base Penalty**

Base Penalty \$ 5,000.00 x Adjustment Factor 1 = \$ **5,000.00**

**C. Number of Days/Weeks/Months or Units in Violation**

Adjusted Penalty \$ 5,000.00 x Number of Days/Weeks/Mo **1** = \$ **5,000.00**

**Comment:** (1) Incident of failing to provide Notification per 40 CFR 61.145(b)

**D. Economic Benefit**

Avoided Costs \$ **0.00** + Delayed Costs \$ **0.00** = \$ 0.00

**Comment:** N/A

**Penalty Subtotal**

Adjusted Base Penalty \$ 5,000.00 + Economic Benefit \$ 0.00 = \$ **5,000.00**

**Northern Nevada Public Health  
Air Quality Management Division  
Recommended Penalty Calculation Worksheet**

**III. Penalty Adjustment Consideration**

**A. Mitigating Factors** (0 +/- 25%)

0%

Comment N/A

**B. Compliance History**

Similar Violation < 12 months (300%)

+ 0%

Similar Violation < 3 years (200%)

+ 0%

Similar Violation > 3 years (150%)

+ 0%

Previous Unrelated Violations < 5years

5% x   , # of previous violations

+ 0%

Comment: N/A

**Total Penalty Adjustment Factors** – Sum of A & B

0%

**IV. Recommended Penalty**

Penalty Adjustment:

\$ 5,000.00	x	<u>0%</u>	=	\$ <span style="border: 1px solid black; padding: 2px; display: inline-block; background-color: yellow;">0.00</span>
Penalty Subtotal (From Section II)		Total Adjustment Factors (From Section III)		Total Adjustment Value

Additional Credit for Environmental Investment/Training - \$   

Comment: \_\_\_\_\_

Adjusted Penalty:

\$ 5,000.00	+/-	<u>\$ 0.00</u>	=	\$ <span style="border: 1px solid black; padding: 2px; display: inline-block; background-color: yellow;">5,000.00</span>
Penalty Subtotal (From Section II)		Total Adjustment Value (From Section III + Credit)		Recommended Penalty

*Joel C. Rosta*  
Senior AQ Specialist/Supervisor

3/17/25  
Date

**Northern Nevada Public Health  
Air Quality Management Division  
Recommended Penalty Calculation Worksheet**

Company Name Saronic Investments, LLC  
 Contact Name Michael Bathla  
 Case Number 1511  
 Violation Number AQMV25-0005  
 Violation of Section 40 CFR 61, Subpart M 61.145(c)(6)  
 Permit Condition N/A

**I. Base Penalty as specified in the Penalty Table** = \$ **2,500.00**

**II. Severity of Violation**

**A. Public Health Impact**

**1. Toxicity of Release** (For Emissions Exceedances)

Unable to Quantify - 1x      Criteria Pollutant - 1x      Hazardous Air Pollutant - 2x  
 Adjustment Factor **2**

**Comment:** Asbestos Fibers are a Hazardous Air Pollutant

**2. Environmental/Public Health Risk** (Proximity to sensitive environment or group)

Negligible - 1x   Moderate - 1.5x   Significant - 2x      Adjustment Factor **2.0**

**Comment:** Significant Risk due to exposure to the public entering and residing in the building

Total Adjustment Factors (1 x 2) = **4**

**B. Adjusted Base Penalty**

Base Penalty \$ 2,500.00 x Adjustment Factor 4 = \$ **10,000.00**

**C. Number of Days/Weeks/Months or Units in Violation**

Adjusted Penalty \$ 10,000.00 x Number of Days/Weeks/Mo **4** = \$ **40,000.00**

**Comment:** (4) Months of failing to use proper procedures for asbestos emssion control

**D. Economic Benefit**

Avoided Costs \$ **0.00** + Delayed Costs \$ **0.00** = \$ 0.00

**Comment:** N/A

**Penalty Subtotal**

Adjusted Base Penalty \$ 40,000.00 + Economic Benefit \$ 0.00 = \$ **40,000.00**

**Northern Nevada Public Health  
Air Quality Management Division  
Recommended Penalty Calculation Worksheet**

**III. Penalty Adjustment Consideration**

**A. Mitigating Factors** (0 +/- 25%)

0%

Comment N/A

**B. Compliance History**

Similar Violation < 12 months (300%)

+ 0%

Similar Violation < 3 years (200%)

+ 0%

Similar Violation > 3 years (150%)

+ 0%

Previous Unrelated Violations < 5years

5% x   , # of previous violations

+ 0%

Comment: N/A

**Total Penalty Adjustment Factors** – Sum of A & B

0%

**IV. Recommended Penalty**

Penalty Adjustment:

\$ 40,000.00	x	<u>0%</u>	=	\$ <span style="border: 1px solid black; background-color: #ffff00; padding: 2px;">0.00</span>
Penalty Subtotal (From Section II)		Total Adjustment Factors (From Section III)		Total Adjustment Value

Additional Credit for Environmental Investment/Training - \$   

Comment: \_\_\_\_\_

Adjusted Penalty:

\$ 40,000.00	+/-	<u>\$ 0.00</u>	=	\$ <span style="border: 1px solid black; background-color: #ffff00; padding: 2px;">40,000.00</span>
Penalty Subtotal (From Section II)		Total Adjustment Value (From Section III + Credit)		Recommended Penalty

  
Senior AQ Specialist/Supervisor

3/17/25  
Date

**Northern Nevada Public Health  
Air Quality Management Division  
Recommended Penalty Calculation Worksheet**

Company Name Saronic Investments, LLC  
 Contact Name Michael Bathla  
 Case Number 1511  
 Violation Number AQMV25-0006  
 Violation of Section 40 CFR 61, Subpart M 61.145(c)(8)  
 Permit Condition N/A

**I. Base Penalty as specified in the Penalty Table** = \$ **10,000.00**

**II. Severity of Violation**

**A. Public Health Impact**

**1. Toxicity of Release (For Emissions Exceedances)**

Unable to Quantify - 1x      Criteria Pollutant - 1x      Hazardous Air Pollutant - 2x  
 Adjustment Factor **1**

**Comment:** Unable to Quantify

**2. Environmental/Public Health Risk (Proximity to sensitive environment or group)**

Negligible - 1x    Moderate - 1.5x    Significant - 2x      Adjustment Factor **1.0**

**Comment:** Negligible Risk

Total Adjustment Factors (1 x 2) = **1**

**B. Adjusted Base Penalty**

Base Penalty \$ 10,000.00 x Adjustment Factor 1 = \$ **10,000.00**

**C. Number of Days/Weeks/Months or Units in Violation**

Adjusted Penalty \$ 10,000.00 x Number of Days/Weeks/Mo **1** = \$ **10,000.00**

**Comment:** (1) Incident of failing to have a trained representative onsite

**D. Economic Benefit**

Avoided Costs \$ **0.00** + Delayed Costs \$ **0.00** = \$ 0.00

**Comment:** N/A

**Penalty Subtotal**

Adjusted Base Penalty \$ 10,000.00 + Economic Benefit \$ 0.00 = \$ **10,000.00**

**Northern Nevada Public Health  
Air Quality Management Division  
Recommended Penalty Calculation Worksheet**

**III. Penalty Adjustment Consideration**

**A. Mitigating Factors** (0 +/- 25%)

0%

Comment N/A

**B. Compliance History**

Similar Violation < 12 months (300%)

+ 0%

Similar Violation < 3 years (200%)

+ 0%

Similar Violation > 3 years (150%)

+ 0%

Previous Unrelated Violations < 5years

5% x   , # of previous violations

+ 0%

Comment: N/A

**Total Penalty Adjustment Factors – Sum of A & B**

0%

**IV. Recommended Penalty**

Penalty Adjustment:

\$ 10,000.00	x	0%	=	\$ 0.00
Penalty Subtotal (From Section II)		Total Adjustment Factors (From Section III)		Total Adjustment Value

Additional Credit for Environmental Investment/Training - \$   

Comment: \_\_\_\_\_  
Adjusted Penalty: \_\_\_\_\_

\$ 10,000.00	+/-	\$ 0.00	=	\$ 10,000.00
Penalty Subtotal (From Section II)		Total Adjustment Value (From Section III + Credit)		Recommended Penalty

*John C. Rosta*  
Senior AQ Specialist/Supervisor

3/17/25  
Date

**Northern Nevada Public Health  
Air Quality Management Division  
Recommended Penalty Calculation Worksheet**

Company Name Saronic Investments, LLC  
 Contact Name Michael Bathla  
 Case Number 1511  
 Violation Number AQMV25-0007  
 Violation of Section 40 CFR 61, Subpart M 61.150  
 Permit Condition N/A

**I. Base Penalty as specified in the Penalty Table = \$ 2,500.00**

**II. Severity of Violation**

**A. Public Health Impact**

**1. Toxicity of Release (For Emissions Exceedances)**

Unable to Quantify - 1x      Criteria Pollutant - 1x      Hazardous Air Pollutant - 2x  
**Adjustment Factor** **2**

**Comment:** Asbestos Fibers are a Hazardous Air Pollutant

**2. Environmental/Public Health Risk (Proximity to sensitive environment or group)**

Negligible - 1x    Moderate - 1.5x    Significant - 2x      **Adjustment Factor** **2.0**

**Comment:** Significant Risk due to open transport and disposal of asbestos containing materials

Total Adjustment Factors (1 x 2) = **4**

**B. Adjusted Base Penalty**

Base Penalty \$ 2,500.00 x Adjustment Factor 4 = \$ **10,000.00**

**C. Number of Days/Weeks/Months or Units in Violation**

Adjusted Penalty \$ 10,000.00 x Number of Days/Weeks/Mo **4** = \$ **40,000.00**

**Comment:** (4) Months of failing to use proper procedures for asbestos emssion control

**D. Economic Benefit**

Avoided Costs \$ **0.00** + Delayed Costs \$ **0.00** = \$ 0.00

**Comment:** N/A

**Penalty Subtotal**

Adjusted Base Penalty \$ 40,000.00 + Economic Benefit \$ 0.00 = \$ **40,000.00**

**Northern Nevada Public Health  
Air Quality Management Division  
Recommended Penalty Calculation Worksheet**

**III. Penalty Adjustment Consideration**

**A. Mitigating Factors** (0 +/- 25%)

0%

Comment N/A

**B. Compliance History**

Similar Violation < 12 months (300%)

+ 0%

Similar Violation < 3 years (200%)

+ 0%

Similar Violation > 3 years (150%)

+ 0%

Previous Unrelated Violations < 5years

5% x   , # of previous violations

+ 0%

Comment: N/A

**Total Penalty Adjustment Factors** – Sum of A & B

0%

**IV. Recommended Penalty**

Penalty Adjustment:

\$ 40,000.00	x	<u>0%</u>	=	\$ <span style="border: 1px solid black; padding: 2px;">0.00</span>
Penalty Subtotal (From Section II)		Total Adjustment Factors (From Section III)		Total Adjustment Value

Additional Credit for Environmental Investment/Training - \$   

Comment: \_\_\_\_\_

Adjusted Penalty:

\$ 40,000.00	+/-	<u>\$ 0.00</u>	=	\$ <span style="border: 1px solid black; padding: 2px;">40,000.00</span>
Penalty Subtotal (From Section II)		Total Adjustment Value (From Section III + Credit)		Recommended Penalty

  
Senior AQ Specialist/Supervisor

3/17/25  
Date

# **Supporting Document 16**

**APPEAL PETITION TO THE AIR POLLUTION  
CONTROL HEARING BOARD**

**APPEAL PETITION TO THE AIR POLLUTION CONTROL HEARING BOARD**

Return to: Northern Nevada Public Health  
Air Quality Management Division  
1001 East Ninth Street B171  
Reno, Nevada 89512  
(775) 784-7200

[www.OurCleanAir.com](http://www.OurCleanAir.com)

PETITIONER: Michael S. Bathla (Saronic Investments)

PHONE: 916-300-8887

EMAIL: eastwesttaxes@gmail.com

MAILING ADDRESS: Type text here 3650 Auburn Boulevard Suite B100

CITY: Sacramento

STATE: CA

ZIP CODE: 95821

PHYSICAL ADDRESS: 3131 South Virginia St

CITY: Reno

STATE: NV

ZIP CODE: 89502

EQUIPMENT OR PROCESS REGISTERED WITH CONTROL OFFICER? YES  NO

APPEAL OF ORDER

APPEAL OF VIOLATION

VIOLATION NUMBER: AQMV25-0003/0004/0005/  
0006/0007

DATE RECEIVED: March 17th 2025

REGULATION INVOLVED: SECTION: \_\_\_\_\_

BASIS FOR APPEAL/VARIANCE: PLEASE SEE ATTACHED BASIS  
FOR APPEAL/VARIANCE STATEMENT.

MICHAEL S. BATHLA, CAA  
NAME OF RESPONSIBLE OFFICIAL

MS Bathla  
SIGNATURE OF RESPONSIBLE OFFICIAL

MANAGING MGR  
TITLE

03-21-2025  
DATE

Revised 03/2024

**Appeal Petition to the Air Quality Control Hearing Board:**

We had hired an independent contractor to perform renovations work on our property (located at 3131 S. Virginia Street, Reno, Nevada 89502) who was provided with all available asbestos testing reports. This contractor was clearly instructed to hire any specialist if needed to perform any work as per City, State and Federal Air Quality and other regulations. Unknown to us, this gentleman violated our instructions. However, as soon as we came to know about his violations, we immediately hired (as your office knows), all required specialists to minimize the damage and to cooperate with all officials and regulations. Due to these violations, our property has been shut down and revenues brought to zero while thousands of penalties have been levied. We feel our financial condition has unjustly been ruined as we have no funds even to pay for the existing fixed costs. We have obtained financing to complete the renovations and have hired SILVER STATE CONSTRUCTION, and all the other specialists required to assist us in all compliance issues with the renovations.

It is based on the above that we humbly beg for your kind consideration in forgiving all fines and penalties and request your guidance and direction so that we can complete the renovations to place the property back in operation.

Your kind consideration and attention to this critical matter and a timely decision and response to our request for a waiver of all fines and penalties is highly appreciated.



Michael S. Bathla, CPA

For Saronic Investments LLC

3131 S. Virginia Street, Reno, NV 89502

Tele: (916) 300-8887