



ATKINS ENVIRONMENTAL HELP, INC.

# **LEAD BASED PAINT SURVEY REPORT**

*For the Property Located at:*  
**24410 San Fernando Road  
Newhall, California 91321**

*Prepared for:*  
**City of Santa Clarita  
23920 Valencia Blvd., Suite 300  
Valencia, CA 91355**

*Prepared by:*  
**Atkins Environmental HELP, Inc.  
P.O. Box 222320  
Santa Clarita, CA 91322-2320**

*May 5, 2011*

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### LABORATORY RESULTS

**LEAD BASED PAINT SURVEY REPORT**  
24410 San Fernando Road ♦ Newhall, CA 91321

## INTRODUCTION

The **City of Santa Clarita** retained **Atkins Environmental HELP, Inc. (AEH)** to conduct a lead-based paint ("LBP") or lead content survey at the commercial facility, located at 24410 San Fernando Road, Newhall, CA 91321.

This report is for the exclusive use of the **City of Santa Clarita** and applies only to the structure referenced above. No one other than the **City of Santa Clarita** may utilize, reference or otherwise rely on this report without prior written consent from **Atkins Environmental HELP, Inc.** and its subcontractors on this specific job.

B.J. Atkins of **AEH** conducted this lead content or LBP paint chip survey on April 20, 2011. **AEH** conducted this field investigations in order to locate, sample, and assess the condition of the LBP on reasonably accessible surfaces. **Accessible Surfaces** are defined in said *U.S. Department of Housing and Urban Development (HUD) Guidelines* as "Any protruding interior or exterior surface... that a young child can mouth or chew."

The *California Code of Regulations, Construction Safety Orders* found in *Title 8 §1532.1(d)(4)(C)* specify employers perform a negative exposure assessment (breathing zone air monitoring) for workers when lead is detected in any quantity. Alternatively, employers can with "objective data...demonstrate surface coating lead at concentrations less than 0.06% lead dry weight (600 ppm) are sufficient to establish a negative (employee exposure) assessment." This means if the paint chips (or lead containing substrate) are less than 0.06% lead by weight, the renovation and disposal can continue without employee protective measures being implemented.

## SAMPLING/TESTING METHODS

**AEH** extracted samples of the suspect substrates and submitted the building material samples to *American Environmental Testing Laboratories (AETL)* for analysis using the following techniques:

- Building material samples were secured under wet methods into zip-loc baggies.
- Using appropriate chain-of-custody procedures, samples were transported to the laboratory for analysis by *EPA Method 6010B*.
- The survey was to establish whether lead was in the building materials (to be disturbed) and if removal could result in lead exposure to renovation workers per *HUD regulations/guidelines* or the *California Code of Regulations Title 8 § 1532.1* respectively.
- To determine if the demolition debris generated would be lead containing and defined as lead abatement waste requiring handling as a hazardous waste per the *California Health & Safety Code § 25150.6(f)(2)(E)*.

## INTERPRETING THE DATA/REPORT

For purposes of this survey, all bulk sample results equal to or greater than 0.06% lead by weight are considered lead containing in accordance with California law. Higher concentrations if "disturbed during renovation and disposal or related activities" according to *8CCR §1532.1* of the *Cal/OSHA Construction Safety Orders* must be removed by a properly licensed lead abatement contractor, in accordance with this California law and other federal, state and local applicable regulations.

In this report, **AEH** referenced California regulation for the purpose of determining whether lead-containing building materials (i.e. wall system/substrate) could be considered a health risk to the tenant or renovation and disposal workers based on residual dust or improper dust management techniques.

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## POSTIVE RESULTS

The following is a list of substrates and their locations:

Sample #	Lab ID #	Description	Lead (mg/Kg or ppm)
A	60995.01	Concrete (cinder block) Brick & Grout	69.6
B	60995.02	Restroom Exterior Paint (white)	2.91J

J = Analyte was detected. However, the analyte concentration is an estimated value, which is between the Method Detection Limit (MDL) and the Practical Quantitation Limit (PQL).

## CONCLUSIONS AND RECOMMENDATIONS

None of sampling points contained lead at or above the regulatory level of 0.06 percent by weight (Wt. %) or 600 ppm concentration.

Currently, there is no Federal or State (EPA or OSHA) regulation which mandates the removal of lead from buildings other than public housing. As long as lead remains in good condition and is not disturbed, lead exposure is unlikely. When building renovation and disposal or other activities disturb lead, or if it is peeling away from the substrate, lead dust may be generated creating a potential lead health hazard to tenants (in this case) or renovation and disposal workers associated with this project.

Generally speaking when the lead concentration in a given substrate is known to exceed the "lead containing" concentration threshold (more than 0.06% or 600ppm) as defined above, OSHA Regulations require construction worker lead exposure be controlled during renovation and disposal activities which will disturb lead. This standard reduces the permitted level of exposure to lead for deconstruction workers to an 8-hour time weighted average of 50  $\mu\text{g}/\text{m}^3$ , known as the Permissible Exposure Limit (PEL). The standard also includes requirements addressing exposure assessment, methods of compliance, respiratory protection, monitoring, etc.

Under OSHA's general duty clause *IT IS THE DEMOLITION CONTRACTORS RESPONSIBILITY TO DOCUMENT HIS/HER WORKERS ARE NOT BEING EXPOSED*. A concentration of 30  $\mu\text{g}/\text{m}^3$  as an 8-hour time weighted average is established as the action level, at which employers must initiate certain compliance activities. Additionally, lead should be identified to any contractor working in the immediate area. The contractor's employees should minimize disturbance (such as chipping, drilling, sanding, scraping, etc.) to the lead containing substrate to reduce the generation of lead dust.

Renovation activities which will chip, grind, sand or otherwise produce dust from lead based paint should be initially monitored for each activity to determine lead exposure to the renovation/construction workers. If monitoring indicates levels above 30  $\mu\text{g}/\text{m}^3$  (as an 8-hour time weighted average), the contractor performing the work shall implement engineering controls to reduce airborne lead levels. If airborne lead concentrations cannot be kept below 30  $\mu\text{g}/\text{m}^3$ , or it is anticipated elevated levels may occur prior to or during renovation activities, the lead should be removed by a licensed lead abatement contractor. This is especially true in the case of residual or fugitive dust, as controlling such will eliminate the potential for exposure by inhalation to tenants. To confirm NO lead dust residual exists or migration has occurred, wipe tests by a certified lead monitor is recommended.

To be considered hazardous waste under 22 CCR § 66261.24(a)(2) the Total Threshold Limit Concentration (TTLC) of 1,000 mg/kg for lead in demolition debris must be exceeded. Since the building materials suspected of containing lead were found to be less than 10% of the TTLC, and the balance of the demolition debris is likely to further dilute the concentration of lead, it is considered reasonable to

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24410 San Fernando Road ♦ Newhall, CA 91321

expect demolition debris to be deemed non-hazardous (for lead). Nonetheless, activities prone to generate dust should be avoided, minimized and/or controlled to the degree possible.

*Atkins Environmental HELP, Inc.* subcontracted with *American Environmental Testing Laboratories (AETL)* who performed the analytical method and prepared the attached laboratory report. No warranties expressed or implied, are made by *AEH* or its subcontractor or their employees as to the use of any information, apparatus, product or process disclosed in this report. Every reasonable effort has been made to assure correctness. If a lead abatement contractor or other renovation/construction contractor is employed, such contractor should bring any discrepancies found in this report as it relates to the current project site conditions, or newly discovered site conditions to the immediate attention of *AEH*. Once lead abatement is complete, a clearance inspection must be performed by a properly certified lead inspector.

State-of-the-art practices have been employed to perform this lead survey and analysis of risk. The scope of this evaluation was severely limited to areas which were considered reasonably accessible (i.e. less than 15 feet from the floor), or within range of a visual inspection through reasonable means. No renovation or product research was performed in attempts to reveal material compositions. The services consist of professional opinions and recommendations made in accordance with generally accepted engineering principles/practices, including the requirements of the federal *Department of Housing and Urban Development*. These services are designed to provide an analytical tool to assist the client. *AEH*, its subcontractor and their employees/representatives bears no responsibility for the actual condition of the structure or safety of this site pertaining to lead and/or lead contamination regardless of the actions taken by the survey team or the client.

*Atkins Environmental HELP, Inc.*, appreciated having the opportunity to inspect your property. If you have any questions regarding this survey or other environmental hazards, please don't hesitate to contact us at (661)260-2260 or (800)750-0622.

Very truly yours,



B.J. Atkins, *Atkins Environmental HELP, Inc.*  
CAC No. 95-1767  
REA II-20182  
QEP No. 03000016  
CHMM No. 3412



# ***Appendix A***



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## ***Laboratory Results***





## American Environmental Testing Laboratory Inc.

2834 & 2908 North Naomi Street Burbank, CA 91504 • DOHS NO: 1541, LACSD NO: 10181  
Tel: (888) 288-AETL • (818) 845-8200 • Fax: (818) 845-8840 • www.aetlab.com

### Ordered By

Atkins Environmental Help, Inc.  
P.O. Box 222320  
Santa Clarita, CA 91322-2320

Telephone: (661) 260-2260  
Attention: B.J. Atkins

Number of Pages 2  
Date Received 04/21/2011  
Date Reported 04/27/2011

Job Number	Order Date	Client
60995	04/21/2011	ATKINS

Project ID: CSC211A  
Site: 24410 Rail Road Avenue

Enclosed please find results of analyses of 2 solid samples which were analyzed as specified on the attached chain of custody. If there are any questions, please do not hesitate to call.

Checked By: \_\_\_\_\_

Approved By: \_\_\_\_\_

Cyrus Razmara, Ph.D.  
Laboratory Director





# American Environmental Testing Laboratory Inc.

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## ANALYTICAL RESULTS

### Ordered By

Atkins Environmental Help, Inc.  
 P.O. Box 222320  
 Santa Clarita, CA 91322-2320

### Site

24410 Rail Road Avenue

Telephone: (661)260-2260

Attn: B.J. Atkins

Page: 2

Project ID: CSC211A

AETL Job Number	Submitted	Client
60995	04/21/2011	ATKINS

Method: (6010B.LEAD), Lead, ICP

QC Batch No: 0426112C1

Our Lab I.D.		Method Blank	60995.01	60995.02		
Client Sample I.D.			Concrete	Restroom Ext Paint		
Date Sampled			04/20/2011	04/20/2011		
Date Prepared		04/26/2011	04/26/2011	04/26/2011		
Preparation Method		3050B	3050B	3050B		
Date Analyzed		04/26/2011	04/26/2011	04/26/2011		
Matrix		Solid	Solid	Solid		
Units		mg/Kg	mg/Kg	mg/Kg		
Dilution Factor		1	1	1		
Analytes	MDL	PQL	Results	Results	Results	
Lead	2.5	5.0	ND	69.6	2.91J	

## QUALITY CONTROL REPORT

QC Batch No: 0426112C1; Dup or Spiked Sample: 61030.01; LCS: Blank; QC Prepared: 04/26/2011; QC Analyzed: 04/26/2011;

Units: mg/Kg

Analytes	Sample Result	MS Concen	MS Recov	MS % REC	MS DUP Concen	MS DUP Recov	MS DUP % REC	RPD %	MS/MSD % Limit	MS RPD % Limit
Lead	3.53	50.0	50.9	94.7	50.0	51.7	96.3	1.68	80-120	<15

QC Batch No: 0426112C1; Dup or Spiked Sample: 61030.01; LCS: Blank; QC Prepared: 04/26/2011; QC Analyzed: 04/26/2011;

Units: mg/Kg

Analytes	LCS Concen	LCS Recov	LCS % REC	LCS/LCSD % Limit					
Lead	50.0	47.4	94.8	80-120					



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### Data Qualifiers and Descriptors

#### *Data Qualifier:*

- \*: In the QC section, sample results have been taken directly from the ICP reading. No preparation factor has been applied.
- B: Analyte was present in the Method Blank.
- D: Result is from a diluted analysis.
- E: Result is beyond calibration limits and is estimated.
- H: Analysis was performed over the allowed holding time due to circumstances which were beyond laboratory control.
- J: Analyte was detected. However, the analyte concentration is an estimated value, which is between the Method Detection Limit (MDL) and the Practical Quantitation Limit (PQL).
- M: Matrix spike recovery is outside control limits due to matrix interference. Laboratory Control Sample recovery was acceptable.
- MCL: Maximum Contaminant Level
- NS: No Standard Available
- S6: Surrogate recovery is outside control limits due to matrix interference.
- S8: The analysis of the sample required a dilution such that the surrogate concentration was diluted below the method acceptance criteria.
- X: Results represent LCS and LCSD data.

#### *Definition:*

- %Limi: Percent acceptable limits.
- %REC: Percent recovery.
- Con.L: Acceptable Control Limits
- Conce: Added concentration to the sample.
- LCS: Laboratory Control Sample
- MDL: Method Detection Limit is a statistically derived number which is specific for each instrument, each method, and each compound. It indicates a distinctively detectable quantity with 99% probability.



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### Data Qualifiers and Descriptors

MS:	Matrix Spike
MS DU:	Matrix Spike Duplicate
ND:	Analyte was not detected in the sample at or above MDL.
PQL:	Practical Quantitation Limit or ML (Minimum Level as per RWQCB) is the minimum concentration that can be quantified with more than 99% confidence. Taking into account all aspects of the entire analytical instrumentation and practice.
Recov:	Recovered concentration in the sample.
RPD:	Relative Percent Difference

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ATKINS ENVIRONMENTAL HELP, INC.

# **ASBESTOS SURVEY REPORT**

*In preparation of:*

***Demolition & Disposal***

*For the Property Located at:*

***24410 San Fernando Road  
Newhall, California 91321***

*Prepared for:*

***City of Santa Clarita  
23920 Valencia Blvd., Suite 300  
Santa Clarita, CA 91355***

*Prepared by:*

***Atkins Environmental HELP, Inc.  
P.O. Box 222320  
Santa Clarita, CA 91322-2320***

*May 5, 2011*



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## INTRODUCTION

The **City of Santa Clarita** retained *Atkins Environmental HELP, Inc. (AEH)* to perform a limited asbestos survey at the property located at 24410 San Fernando Road, Newhall, CA 91321.

This report is for the exclusive use of the **City of Santa Clarita** and applies only to the building referenced above. No one other than the **City of Santa Clarita** may utilize, reference or otherwise rely on this report without prior written consent from *Atkins Environmental HELP, Inc.* and its subcontractors on this specific job.

## PURPOSE AND SCOPE

The purpose of this limited investigation is to sample and analyze suspect asbestos-containing materials (ACM), specifically those building materials which may present (or may have presented) an asbestos exposure risk to demolition workers, the public or the environment during demolition and disposal activities related to this commercial building (auto body shop). The suspect materials sampled during the site investigation were limited to accessible areas of this building.

Selected materials were sampled and later analyzed using the *Polarized Light Microscopy (PLM)* method in accordance with the *EPA* reference method 600/R-93/116 for Determination of Asbestos content in Bulk Samples.

## METHODOLOGY

The PLM Method is the most commonly used method to analyze building materials for the presence of asbestos. This method utilizes the optical properties of minerals to identify the selected constituent. The use of this method enables identification of the type and the percentage of asbestos in a given sample. The detection limit of the PLM method for asbestos identification is about one percent (1%) asbestos. Because the State of California recognizes asbestos-containing construction material (ACCM) as any material which contains greater than or equal to one tenth of one percent (0.1%) asbestos, materials containing "trace" amounts of asbestos are reported by the laboratory as ACCM in the State of California. Transmission Electron Microscopy (TEM) analysis is recommended for asbestos samples with less than one percent (<1%) asbestos content and point count with results ranging between one percent (1%) and ten percent (10%) when analyzed via PLM.

In some cases, samples collected from an apparently homogeneous material and yielding mixed results may in fact have been taken from different homogeneous materials displaying similar visual characteristics but composed of different constituents. Although materials may appear to be homogeneous, they may have been produced in different batches or by different manufacturers. Material, which appears to be homogeneous but yield mixed results is typically assumed, in accordance with *Asbestos Hazard and Emergency Response Act (AHERA)* procedures, to be asbestos-containing in all areas where the material is located.

The aforementioned constraints can affect the findings and recommendations to this survey. Specifically, no assurance is given regarding the building materials which tested negative are in fact negative for asbestos content, and the samples which tested positive are positive for asbestos content. Further investigation is not recommended unless the client can determine it is cost-effective to do so.

## ASBESTOS SURVEY REPORT

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Documentation of the laboratory results should be retained as a reference for future demolition activities.

This evaluation was performed in accordance with the Asbestos-Containing Materials in Buildings rule written by the U.S. EPA and enforced by the South Coast Air Quality Management District.

The asbestos-containing materials most likely to release asbestos fibers are those which are in a friable state. Friability describes the condition of asbestos. *The definition of friable is any material capable of being crumbled, pulverized or reduced to powder by hand pressure.*

Non-friable sources of asbestos are materials containing cement or asphalt binder which may become friable and release fibers if the sources are exposed to actions such as abrasion, drilling, cutting, fracturing or hammering. Non-friable sources of asbestos do not typically pose a significant exposure risk if they remain in good condition and are not disturbed. During renovation or demolition activities, non-friable sources may become friable and thus may pose an exposure risk.

Federal, State, and Local laws require building owner(s) and/or their representatives or contractors, prior to any demolition and/or renovation operations which may disturb any asbestos-containing materials in a building, meet the following requirements:

- Notifications,
- Removal techniques for asbestos-containing materials,
- Clean-up procedures,
- Waste storage and disposal requirements.

In Southern California, for example, the South Coast Air Quality Management District (SCAQMD) or at least one of the air agencies listed below, must be notified 10 working days prior to the start of any demolition or asbestos-abatement projects which exceed 100 square feet of asbestos-containing material. This project is within the jurisdiction of the:

District	Applicable Regulation
<input type="checkbox"/> Antelope Valley APCD	1414
<input type="checkbox"/> San Joaquin Valley Unified APCD	7050
<input type="checkbox"/> Ventura County APCD	62.7
<input checked="" type="checkbox"/> South Coast AQMD	1403
<input type="checkbox"/> Santa Barbara County APCD	338
<input type="checkbox"/> Mojave APCD	1000(C)(2)(m)

Additionally, the Division of Occupational Safety & Health (DOSH or CAL/OSHA) must be notified a minimum 24 hours prior to the start of any asbestos-abatement project. Such notifications are part of the scope of work for the selected asbestos abatement contractor (if applicable) typically.

### BULK SAMPLING RESULTS

A total of eight (8) bulk samples of presumed asbestos containing materials were analyzed. Two (2) of the eight bulk samples were separated by the laboratory for a total of ten (10) discrete analyses. If such a separation has occurred, the resulting discrete sample and analysis is denoted with an alpha suffix (i.e., Base Coat or BC, Drywall or DW, Finish Coat or FC, and Joint Compound or JC). **Asbestos was detected in only one of the ten (10) samples analyzed.** The laboratory results contain a complete list of all samples collected/analyzed and can be found attached to this document.

## ASBESTOS SURVEY REPORT

24410 San Fernando Road ♦ Newhall, CA 91321

### SUMMARY OF ANALYTICAL RESULTS

Sample #	Lab ID #	Description	Friable in Existing Condition	Asbestos %	Separated at Lab	Estimated Area (Sq. Ft.)
				Method Detection Limit 0.1%		
1-DW	321106951-0001	W/S Restroom	No	None Detected	Yes	700
1-JC	321106951-0001A	W/S Restroom	No	None Detected	Yes	Same
2-DW	321106951-0002	W/S Office interior	No	None Detected	Yes	600
2-JC	321106951-0002A	W/S Office interior	No	None Detected	Yes	Same
3	321106951-0003	W/S Office exterior	No	None Detected	No	600
4	321106951-0004	Concrete block (cinder block) & grout	No	None Detected	No	5280
5	321106951-0005	Roofing Material	No	None Detected	No	7000
6	321106951-0006	Roofing Material	No	None Detected	No	Same
7	321106951-0007	Roof Patch	No	2% Chrysotile	No	<100
8	321106951-0008	Sub Roof	No	None Detected	No	Same

### SUPPLEMENTAL ANALYSIS

In this case, the wall systems and roofing materials (except for a small amount of roof patch) were found to not contain asbestos after the laboratory had segregated the layers. Because it would be impossible to remove the wall systems one layer at a time, the laboratory separated the layers for analysis. In this fashion samples are for specific materials, are not subject to dilution, and false negatives may be avoided.

### VISUAL INSPECTION

Suspect asbestos containing material observed at the time of the inspection was sampled and analyzed for asbestos content. The survey was also to establish whether any of the substrates sampled could be considered friable and significantly damaged or capable of immediate worker or tenant exposure during demolition. The materials of concern were found to be in good condition (not friable) as noted in the description area in the table above.

### CONCLUSION

According to bulk sampling and visual inspection, asbestos-containing materials above the CAL/OSHA threshold for asbestos was detected in only one of the samples taken from the property located at 24410 San Fernando Rd., in Newhall, CA 91321. Asbestos was found only in the roof patch materials associated with this structure.

## ABATEMENT SPECIFICATIONS

Since only one of the samples taken detected the presence of asbestos (at greater than 1%) in the existing building materials, a properly trained Asbestos Contractor Supervisor is required for demolition and disposal of this small amount of roof patch (<100sq). Notification to the local air district identified above and the Department of Occupational Safety and Health (DOSH) is NOT required. A licensed asbestos abatement contractor supervisor (meaning an individual who has taken and passed the five day course) can follow the required procedures for removal of this roof patch material. This project can be rather surgical in nature and is exempt from most provisions related to asbestos demolition. The waste generated from roof patch removal will be more than the 1% asbestos and defined as hazardous waste according to federal and state law.

*Atkins Environmental HELP, Inc.* subcontracted with *California Testing Laboratories (CTL)* who performed the asbestos analysis. No warranties expressed or implied, are made by *AEH* or its subcontractor *CTL*, or their employees as to the use of any information, apparatus, product or process disclosed in this report. Every reasonable effort has been made to assure correctness. If an Asbestos Abatement Contractor or other Demolition/Construction Contractor is employed, such contractor should bring any discrepancies found in this report as it relates to current site conditions or newly discovered site conditions to the immediate attention of *AEH*.

State-of-the-art practices have been employed to perform this asbestos identification and analysis of risk. The scope of this evaluation was severely limited to areas which were considered reasonably accessible (i.e. less than 15 feet from the floor), or within range of a visual inspection through reasonable means. No demolition or product research was performed in attempts to reveal material compositions. The services consist of professional opinions and recommendations made in accordance with generally accepted engineering principles/practices. These services are designed to provide an analytical tool to assist the client. *AEH* and its subcontractor *CTL* and their employees/representatives bear no responsibility for the actual condition of the structure or safety of this site pertaining to asbestos and/or asbestos contamination regardless of the actions taken by the survey team or the client.

*AEH* appreciated having the opportunity to inspect this property. If you have any questions regarding this survey or other environmental hazards, please don't hesitate to contact us at (661)260-2260 or (800)750-0622.

Very truly yours,



B. J. Atkins  
OAC No. 95-1767

*Atkins Environmental HELP, Inc.*