

Hazardous Materials Investigation

4212 Commerce Circle, Victoria, BC



Prepared for
McElhanney
500-3960 Quadra Street,
Victoria, BC V8X 4A3

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201-990 Hillside Avenue,
Victoria, B.C., V8T 2A1
778-406-0933
www.islandehs.ca

Executive Summary

Island EHS was engaged by McElhanney to carry out a destructive hazardous materials investigation at 4212 Commerce Circle, Victoria, BC. This investigation was conducted prior to demolition of the building. The building was unoccupied at the time of the investigation. This investigation was carried out on March 10, 2025 and was intended to identify the locations and types of hazardous materials that are present in the building. Roof sampling was conducted on May 3, 2025.

The building was constructed in 1988 and was a two-storey, wood-framed office and service repair garage building on a concrete foundation. All accessible areas of the building were inspected; invasive sampling was carried out. The following hazardous materials were reviewed:

Material	Description	Location and Quantity Estimates	Recommendation
Asbestos	Sink Mastic	1 sink in the 2 nd floor staff room	Moderate risk asbestos abatement work procedures If unidentified materials are encountered, work must stop until the material is identified and assessed
Lead	Lead containing paints were identified on interior surfaces.	Red paint on Maintenance Bay trim and doors. Approximately 7 doors with trim.	Personal protective equipment during demolition Lead exposure control plan Risk Assessment by Qualified Person Recycle flashings
Silica	Presumed in concrete, acoustic ceiling tiles, mortar, ceramic tile, grout, concrete block, stucco, asphalt roofing and drywall	Located throughout Not quantified	Personal protective equipment during demolition Silica exposure control plan
Mercury	Fluorescent light tubes were observed in the building. Thermostats were not observed in the building.	Located throughout. Not quantified	Remove for proper disposal
Hantavirus - Rodent Droppings	Rodent droppings were observed in the building	Located throughout. Not quantified	Personal protective equipment during demolition Hantavirus exposure control plan
CCA-Pressure Treated Wood	Pressure treated wood was not observed in the building	Not applicable	No action necessary
Radioactive Materials	Smoke detectors were not observed in the building	Not applicable	No action necessary
Mould	None observed in the building	Not applicable	No action necessary
PCBs	Fluorescent light fixtures were observed in the building	Not applicable	Based on the age of construction, PCBs are not suspected - No action necessary
Ozone Depleting Substances	Older refrigeration equipment were not present in the building	Not applicable	No action necessary
Urea Formaldehyde Foam Insulation	None observed	Not applicable	No action necessary

Material	Description	Location and Quantity Estimates	Recommendation
Above Ground Storage Tanks (AGST)	Waste oil was observed in the building	Two 1000L totes and one 200L barrel located in a closet adjacent to parts storage	Empty, clean and dispose as per Ministry of Environment and Parks Guidelines
Leachable Lead	TCLP analysis found to have leachable level of lead below the regulation limit	Maintenance Bay doors and trim	There are no special disposal requirements for these materials with regards to leachable levels of lead.
Other Hazardous Materials	Synthetic Insulation observed	Throughout in wall and ceiling cavities	Personal protective equipment during demolition

*** Materials may be encountered during work activities that are not identified in this report. If this happens, work must stop in those areas until the materials are properly identified.**

*** Recommendations highlighted in RED will be followed by abatement contractors and are based on WorkSafeBC guidelines.**

Table of Contents

Executive Summary	2
1.0 Introduction	5
2.0 Hazardous Materials	5
2.1 Materials Subject to WorkSafeBC Regulations & Guidelines	5
2.1.1 Asbestos	5
2.1.2 Lead	6
2.1.3 Silica	7
2.1.4 Mercury	8
2.1.5 Hantavirus	8
2.1.6 CCA-Pressure Treated Wood	8
2.1.7 Radioactive Materials	9
2.1.8 Mould	9
2.2 Materials Controlled by Environmental Regulations	9
2.2.1 Polychlorinated Biphenyls	9
2.2.2 Ozone Depleting Substances	10
2.2.3 Urea Formaldehyde Foam Insulation	10
2.2.4 Fuel Oil Storage Tanks	10
2.2.5 Leachable Metals	10
2.2.6 Other Materials	10
3.0 Methodology	11
3.1 Visual Inspection	11
3.2 Asbestos Containing Materials	11
3.3 Lead Containing Paints	11
3.4 Other Hazardous Materials	11
4.0 Results and Recommendations	12
4.1 Asbestos	12
4.2 Lead Containing Paints	13
4.3 Leachable Metals	15
4.4 Silica	15
4.5 Mercury	16
4.6 Hantavirus (and other Animal Droppings)	16
4.7 CCA-Pressure Treated Wood	16
4.8 Radioactive Materials	16
4.9 Mould	17
4.10 Polychlorinated Biphenyls	17
4.11 Ozone Depleting Substances	17
4.12 Urea Formaldehyde Foam Insulation	17
4.13 Fuel Oil Storage Tanks	17
4.14 Other Materials	17
4.15 Abatement Clearance Documentation	18
5.0 Closure	18
Appendix 1 Photographs	
Appendix 2 Laboratory Results	
Appendix 3 Sample Locations	

1.0 Introduction

Island EHS was engaged to carry out a destructive limited hazardous materials investigation at 4212 Commerce Circle, Victoria, BC, on behalf of McElhanney. This investigation was conducted prior to demolition of the building. The building was unoccupied at the time of the investigation on March 10, 2025. Roof sampling was conducted on May 3, 2025.

The building was constructed in 1988 and was a two-storey, wood-framed office and service repair garage building on a concrete foundation. The interior building finishes include carpet, vinyl sheet floor, drywall, concrete block, and acoustic ceiling tile. The exterior finishes include aluminum windows, stucco, torch-on asphalt roofing, vinyl deck covering, concrete block, and metal roofing. The building was heated by a forced air system and electric baseboards. The building was insulated with fibreglass batts. No attic space was identified in the building. Coring of concrete block was conducted, and no vermiculite insulation was identified. A detached shed was also included in this assessment. Shed finishes included wood siding and metal roof. The shed was insulated with fibreglass insulation.

The proposed scope of work includes demolition of the building. All areas of the interior of the building were assessed.

2.0 Hazardous Materials

Hazardous materials that are present in many common building materials must be removed or controlled prior to or during renovations or demolition to mitigate worker exposures and prevent cross contamination into adjacent areas. The British Columbia *Occupational Health and Safety Regulations* (OHSR) and *Guidelines* establish the handling and management of several hazardous materials. Other materials are regulated by Federal Environmental laws. Section 20.112(b) of the OHSR requires that this report be on site during any renovation, construction, or demolition work.

2.1 Materials Subject to WorkSafeBC Regulations & Guidelines

2.1.1 Asbestos

Asbestos is a generic term used to describe a group of naturally occurring fibrous minerals divided based on their mineralogical properties into; **serpentine** (snake-like or “S”-shaped); and **amphiboles** (“needle-like”). Three (3) types of asbestos were used commercially and were commonly encountered here in B.C. - Chrysotile (white), Amosite (brown) and Crocidolite (blue). Other forms of asbestos, which typically had little commercial value or use include Actinolite, Anthophyllite and Tremolite. These forms of asbestos also belong to the amphibole family and may be found in Vermiculite insulation.

Asbestos is a very common component of building materials. Most asbestos containing materials went out of use in the early 1980s. However, asbestos was only recently banned in 2019 and so some building materials may still contain asbestos and must be inspected prior to the start of renovation or demolition activities.

Asbestos becomes a hazard when it is disturbed, and airborne dust is created. Employers must ensure that asbestos containing materials are not unintentionally and uncontrollably disturbed. Asbestos exposure is known to cause asbestosis, lung cancer and mesothelioma.

Asbestos has been used in approximately 3,000 manufactured products, for its fire-resistance, high tensile strength, chemical degradation resistance, high electrical resistance and insulating properties. Common sources of asbestos containing materials in residential structures include:

- Vinyl floor products (sheet flooring and floor tiles)
- Drywall filler compounds
- Plasters and stuccos
- Textured ceiling applications
- Duct tape (on heating system ducting and around forced air registers)
- Vermiculite
- Caulking and putties (on windows and doors and in levelling compounds)
- Cement products (siding and shingles as well as underground drainage pipes)
- Roofing felts and papers
- Pipe insulation (on piping, boilers and hot water tanks)

WorkSafeBC defines an asbestos containing material (ACM) as one containing 0.5% or more asbestos by weight. Vermiculite is an ACM if any asbestos is present. WorkSafeBC has designated asbestos as an ALARA substance, which means that exposures must be kept “as low as reasonably achievable”. Section 6.3 of the Occupational Health and Safety Regulation states that employers are required to develop and implement an exposure control plan when workers may be exposed to asbestos.

All asbestos waste must be handled, transported, and disposed of in accordance with the Ministry of Environment and Parks Strategy *Hazardous Waste Regulations*.

2.1.2 Lead

Lead is a naturally occurring, blueish-grey metal that is soft, malleable, corrosion-resistant and easily melted (melting point of 327°C). It can be found in a wide variety of consumer and industrial products, from electrical equipment, x-ray equipment, vehicle batteries, decorate glass, extruded ammunition, pigments, and coatings to storage containers for nuclear waste.

There are two types of lead: organic and inorganic. Organic lead is less common having been phased out in the 1970s and banned since 1990 in British Columbia, except for certain applications (e.g., non-road vehicles).

Employee exposures to inorganic lead in the workplace are more common having been commonly used in paints and coatings. Coatings manufactured prior to 1970 are likely to contain high concentrations of lead. In the late 1970s, Canada restricted the concentration of lead in consumer paints to 5,000 micrograms per gram ($\mu\text{g/g}$). These restrictions did not apply to exterior paints. The level of lead in consumer paints was last reduced by the Federal government to 90 $\mu\text{g/g}$ in 2010. Lead can still be added to certain classes of paint if the display panel carries a warning. Lead in paint concentration is not regulated when used in commercial or industrial worksites.

Lead becomes a hazard when painted surfaces are disturbed and airborne dust is created. Caution must be taken to ensure that lead containing materials are not disturbed. Lead exposure is known to have several health effects including damage to the central and peripheral nervous systems. It also affects the uptake of oxygen in the blood and can accumulate in bones. Lead is toxic to both male and female reproductive system and can have damaging effects to a developing fetus. Lead exposures can also occur when lead products are touched and lead contamination is ingested (eaten).

Lead is used in plumbing fixtures. Flashings and other products found on roofs may be made of pure lead. Lead has also been used in solders. This may be found on plumbing lines as well as on electrical equipment.

WorkSafeBC has designated lead as an ALARA substance. This means that exposures to this material must be kept "as low as reasonably achievable". An employer must not permit workers to engage in a work activity or lead process that may expose workers to lead dust, fumes or mist unless a risk assessment has first been completed by a qualified person. If the risk assessment indicates potential for lead exposure, an exposure control plan meeting the requirements of Section 5.54 of the Occupational Health and Safety Regulation must be developed.

Disposal of lead-painted waste materials are regulated by the Ministry of Environment and Parks Strategy *Hazardous Waste Regulations*. This regulation requires lead painted materials to undergo leachate analysis to evaluate if the waste is considered hazardous. Painted materials that leach lead under the regulated limit may be disposed of as regular waste.

2.1.3 Silica

Respirable crystalline silica (RCS) is a natural component of stone, rock, soil, and sand. It is also found in other materials such as concrete, mortar, granite, and artificial stone. The most common form of crystalline silica is quartz. Cutting, drilling, chipping, sanding, or grinding materials that contain crystalline silica can release hazardous levels of respirable dust in the air that workers breathe.

Exposure to RCS can also cause Silicosis, which is an incurable lung disease that can lead to disability and death. Silicosis is the result of the body's response to the presence of the silica particles in the lung. Silica particles are very small in size and can reach deep into the lungs (all the way into the alveoli) where they are removed by white blood cells. Free crystalline silica causes the white blood cells to break open, which form scar-like patches on the surface of the alveolus. When many these "scars" form, the alveolar surfaces become less elastic. Over time, this damage reduces the transfer of gases, which can lead to shortness of breath.

There are three major types of silicosis each with their own set of symptoms:

- **Acute Silicosis** occurs after a few months or as long as 2 years after exposures to extremely high concentrations of silica dust. Signs and symptoms of acute silicosis include shortness of breath, weakness, fever, cough, and weight loss.
- **Chronic Silicosis** is the most common and occurs after 15–20 years of moderate to low exposures. Symptoms may or may not be obvious. People suspected of having chronic silicosis may need to have a chest x-ray to determine if there is lung damage. As the disease progresses, sufferers may experience shortness of breath when exercising and have clinical signs of poor oxygen/carbon dioxide exchange. In the later stages, the sufferers may experience fatigue, extreme shortness of breath, chest pain, or respiratory failure.
- **Accelerated Silicosis** onset is quicker than chronic silicosis and can be detected after 1–10 years of high exposures. Symptoms include severe shortness of breath, weakness, and weight loss.

Because RCS is classified as carcinogenic to humans, WorkSafeBC considers RCS as a **Designated Substance**, which are chemicals that can cause cancer, sensitization, or reproductive effects. WorkSafeBC requires exposures to Designated Substances to be kept As Low As Reasonably Achievable (ALARA). Accordingly, an employer must have a qualified person perform a risk assessment prior to engaging activities that may expose workers to respirable crystalline silica dust. The employer must also have an exposure control plan meeting the

requirements of Section 5.54 of the Occupational Health and Safety Regulation and accompanying safe work procedures for the work performed.

2.1.4 Mercury

Mercury is a metal that is liquid at room temperatures and vaporizes at low temperatures and is found in thermostats, thermometers, and inside fluorescent light tubes.

Mercury has a significant toxic effect on the central nervous system and can cause disease and even death. Mercury becomes a hazard when it is released into the environment where vapours are inhaled, or the liquid is unintentionally ingested (hand-to-mouth action). Mercury vaporizes at room temperatures, which can lead to significant airborne concentrations. This can occur when mercury thermometers, thermostat bulbs, or fluorescent light tubes are broken.

WorkSafeBC has designated mercury as an ALARA substance. This means that exposures to this material must be kept “as low as reasonably achievable”. Section 5.54 of the OHSR requires employers to develop and implement an exposure control plan when workers may be exposed to airborne concentrations of mercury greater than 50% of the exposure limit.

Mercury wastes are disposed of in accordance with current Ministry of Environment and Parks Strategy requirements, and/or as per local landfill requirements. Some communities may accept fluorescent light tubes at recycling depots.

2.1.5 Hantavirus

Hantavirus Pulmonary Syndrome may be contracted when encountering the airborne contaminated particles of urine, saliva or droppings of infected deer mice. Since it is not possible to readily differentiate rodent droppings between various species, WorkSafeBC considers all rodent droppings to be potentially contaminated with the Hantavirus.

WorkSafeBC requires employers to develop and implement an exposure control plan when workers may be exposed to potentially contaminated rodent droppings. Refer to the WorkSafeBC publication *A Hantavirus Exposure Control Program for Employers and Workers*. Other diseases are associated from contact with other animal droppings, most notably Histoplasmosis, from contact with infected bird droppings.

Any (potentially) hantavirus-contaminated waste should be treated/sprayed with a disinfectant (i.e., 10 percent chlorine bleach) and doubled bagged in plastic and sealed. Once treated and appropriately sealed, it can be disposed of with regular construction waste, or household garbage.

2.1.6 CCA-Pressure Treated Wood

Prior to 2004 pressure treated wood manufactured used chromated copper and arsenate (CCA) as an insecticide, fungicide, and rodenticide preservative. CCA was a major source of treated wood for decks, playgrounds, and other outdoor residential structures.

Exposure concerns are centered around arsenic, an element that can increase the risk of cancer when the CCA wood is aggressively disturbed creating contaminated airborne dust where it can be inhaled. Sawdust from cutting pressure treated wood or burning these materials can result in significant airborne arsenic concentrations. Workers should use the appropriate PPE when handling or cutting pressure treated wood.

Disposal of arsenic waste must be in accordance with the Ministry of Environment and Parks Strategy *Hazardous Waste Regulations*.

2.1.7 Radioactive Materials

A very small amount of radioactive material ($^{241}\text{Americium}$) is sealed in a metal case inside smoke detectors. These detectors may be of the ionization type or photoelectric type. Ionization smoke alarms contain a small amount of a material called Americium 241, which emits alpha particles that collide with the oxygen and nitrogen in the air to create ions. Photo-electric smoke detectors use a tiny beam of light to detect smoke particles with no radioactive materials. If smoke detectors are used as directed and not opened, or damaged, they pose no radiation health risk to humans.

Some ceramic tiles and forms of granite have also been found to contain radioactive materials. Radon is a naturally occurring gas found in the earth's crust created during the decay of other radioactive materials. Radon may seep into buildings through porous below-grade foundations.

Dispose smoke detectors in accordance with Canadian Nuclear Safety Commission requirements and/or disposed of as per local landfill requirements. Radiation exposures from smoke detectors is not considered hazardous to workers.

2.1.8 Mould

Mould is prevalent with mould spores being present in all indoor and outdoor environments. Mould is a type of fungus and is nature's way of breaking down and recycling organic materials. Mould spores require suitable moisture, temperatures, and food sources to begin the fungal growing sequence. Water leaks (even very minor leaks) and moisture accumulation are usually sufficient for mould to begin growing inside buildings.

Prolonged exposures to mould spores indoors may result in allergy type responses in susceptible individuals. These are similar in nature to "hay fever" and can include runny eyes and noses and throat irritation. In more extreme cases, exposure to mould spores can result in "pneumonia-like" responses or infections in immunocompromised individuals.

WorkSafeBC, or any other regulatory body, have not established exposure levels for airborne mould spores. Section 4.79 of the BC *Occupational Health and Safety Guideline* outlines protocols for assessing and remediating mould contamination. The Canadian Construction Association document "Mould Guidelines for the Canadian Construction Industry," CCA82-2018 also provides protocols for fungal remediation. Mould contaminated materials may be disposed of as regular construction waste.

2.2 Materials Controlled by Environmental Regulations

2.2.1 Polychlorinated Biphenyls

Polychlorinated biphenyls (PCBs) must be handled, stored, labelled, and disposed of in accordance with the Federal Canadian Environmental Protection Act, *PCB Regulations* (SOR/2008-273) and the BC Ministry of Environment and Parks Strategy *Hazardous Waste Regulations*.

Fluorescent light ballasts manufactured prior to 1981 must be treated as PCB waste and stored and disposed of in accordance with current regulations. Fluorescent light fixtures removed during demolition, construction or maintenance activities must be inspected for the presence of PCBs. Each ballast identified as containing PCBs must be sent to a licenced facility in accordance with

the *Hazardous Waste Regulations*. Transformer fluids or other non-liquid PCBs were not assessed.

2.2.2 Ozone Depleting Substances

Ozone depleting substances (ODS) and chlorofluorocarbons are commonly found in older refrigerators, air conditioning units, and fire suppression systems. When systems or equipment contains ODS are set for disposal all the ODS must be collected for recycling or disposal by a licenced contractor in accordance with the Environmental Management Act, *Ozone Depleting Substances and Other Halocarbons Regulation* (B.C. Reg. 253/2022).

2.2.3 Urea Formaldehyde Foam Insulation

Urea formaldehyde foam insulation (UFFI) was used as a retrofit insulation in older buildings. The expanding foam would be sprayed into wall and ceiling cavities to provide additional insulation in older buildings. It was most used in residential settings. Over time, in the presence of moisture, the insulation can break down and release formaldehyde gas. This insulating material was banned in 1978. If identified, UFFI may be disposed of as regular construction waste.

2.2.4 Fuel Oil Storage Tanks

Fuel oil storage tanks (above and below ground) are found in many houses and commercial buildings. The tanks can corrode and leak as they age spilling their contents and contaminating local soils and groundwater.

Tanks no longer in use must be removed for disposal and the surrounding soil checked for contamination. There are currently no specific provincial regulations to govern petroleum storage tank disposal. We recommend follow the Ministry of Environment and Parks Strategy publication *A Field Guide to Fuel Handling, Transportation, and Storage* (3rd Edition, February 2002).

2.2.5 Leachable Metals

The Ministry of Environment and Parks Strategy *Hazardous Waste Regulation* requires lead containing materials to be tested for leachability prior to disposal at a licensed landfill. We recommend having lead containing materials with concentrations over 0.01% by weight (100 µg/g or ppm) tested using the Toxicity Characteristic Leachate Procedure (TCLP) analysis. Those materials that leach more than 5.0 milligrams of lead per liter (mg/L) must be disposed of as hazardous waste to comply with the *Hazardous Waste Regulation*.

2.2.6 Other Materials

Other toxic, flammable, or explosive chemicals may be present that will be affected by renovations or demolition, including:

- Propane or butane cylinders
- Paint
- Solvents
- Toxic or corrosive products
- Other flammable materials

3.0 Methodology

3.1 Visual Inspection

Island EHS conducted a visual inspection collecting detailed notes with each sample including a room identifier, type of material, and sample location. We also collected digital photographs of each sampling location and of representative hazardous building materials.

Only reasonably accessible areas were surveyed, which included areas above dropped ceilings, within manufactured hatches or behind unlocked doors, and areas not impeded by any structure, article or item. Inaccessible areas that were excluded from our survey are defined as any space or system that required substantial demolition to access or operational equipment, such as boilers or HVAC systems. Confined spaces, any areas requiring fall protection, or areas otherwise deemed unsafe for the surveyor were not entered.

3.2 Asbestos Containing Materials

Island EHS collected seventy (70) bulk samples of building materials for analysis of asbestos content (see Appendix 2 for a complete list of materials and the analytical results). Bulk samples were collected by a WorkSafeBC Level S: Surveyor Safety certified person. Quantities and materials sampled were selected based on our experience and on the WorkSafeBC guideline "Safe Work Practices for Handling Asbestos" (current edition). Bulk samples were analyzed at our in-house laboratory in accordance with the National Institute for Occupational Safety and Health (NIOSH) Analytical Method 9002, "Asbestos (bulk) by Polarized Light Microscopy."

Island EHS's laboratory is deemed proficient by the American Industrial Hygiene Association (AIHA) and participates in quarterly rounds of proficiency testing to maintain registration. Refer to Appendix 2 for analytical results.

3.3 Lead Containing Paints

Island EHS collected fourteen (14) representative sample of paint chips for analysis. The samples were collected in labelled re-sealable containers and submitted to our in-house laboratory for analysis of lead content using ASTM E1645-01 (for sample preparation of dried paint) and EPA 7000B (using Flame Atomic Absorption Spectrophotometry).

Wherever a contradiction regarding control measures exists, the more stringent of the controls (e.g. asbestos controls) to satisfy WorkSafeBC must be implemented and strictly followed.

Island EHS also collected one (1) composite sample of red painted door trim from the Maintenance Bay. The sample was submitted to Bureau Veritas, an ISO/IEC accredited laboratory, for Toxicity Characteristic Leachate Procedure (TCLP) analysis to evaluate lead leachability for compliance with the *Hazardous Waste Regulation* for disposal. The sample was analyzed using the EPA Method 1311 TCLP and EPA Method 6010d inductively coupled plasma - mass spectrometry (ICP-MS).

Refer to Appendix 2 for analytical results.

3.4 Other Hazardous Materials

The presence of mercury, CCA-pressure treated wood, ozone-depleting substances (ODS), polychlorinated biphenyls (PCBs), radioactive sources, silica, rodent/avian feces, mould, urea-

formaldehyde foam insulation (UFFI), oil storage tanks, and other hazardous chemicals was determined by visual inspection only; no sampling of these materials was carried out.

4.0 Results and Recommendations

The building was inspected for the presence of a variety of hazardous materials. WorkSafeBC requirements specify that precautions are necessary when handling these materials. The necessary precautions will depend on the disposition of each hazardous material.

Trained qualified contractors are required to carry out remedial work on hazardous materials. All general demolition work should be carried out by workers wearing the proper personal protective equipment (PPE), including respirators and disposable coveralls.

Copies of this report must be provided to contractors engaged to renovate the building.

Notices of Project must be submitted in accordance with WorkSafeBC requirements.

Materials may be encountered during work activities that are not identified in this report. If this happens, work must stop in those areas until the materials are properly identified.

Photographs of all samples analyzed are presented in Appendix 1. Analytical results are presented in Appendix 2. Floor plans showing sample locations are presented in Appendix 3.

4.1 Asbestos

Island EHS collected seventy (70) representative bulk samples of drywall joint filler, acoustic ceiling tile, adhesive, sink mastic, vinyl sheet floor, vinyl deck membrane, putty, caulking, mortar, stair tread, grout, mastic, tar, torch-on asphalt, and stucco from the building. Table 1 summarizes the asbestos containing materials that were identified.

Table 1: Summary of Asbestos Containing Materials Analytical Results – March 10, 2025

Location	Description	Asbestos Type & Percentage	Approximate Quantity	Removal Requirements
Mezzanine – Break Room, Sink	Mastic	1% Chrysotile	One (1) sink	Moderate risk asbestos abatement work procedures

*Quantities of identified asbestos containing materials are an estimate of observable asbestos-containing materials. Concealed or inaccessible materials may not have been included in this estimate. The abatement contractor is responsible to ensure accurate measurements.

All efforts were made to determine all potential layers of material; additional layers may still exist. If discovered, work must stop and the material should be tested for the presence of asbestos.

Our visual inspection of accessible areas within the building did not find vermiculite insulation. Coring of select concrete block was conducted, and no vermiculite insulation was identified. Vermiculite may be present in areas we did not inspect such as beneath insulation, within false ceilings, within wall/ceiling cavities, and within other concrete block not cored. If discovered, work must stop and the material should be tested for the presence of asbestos prior to disturbance.

The Capital Regional District requires Hazardous Materials Survey and Bulk Analysis Reports to be less than a year old from the time of analysis for asbestos containing material. Please contact the CRD's information line, at info@crd.bc.ca or 250-360-3030, if you have any questions. At their discretion, they will accept data older than one year dependent on applicable circumstances.

The WorkSafeBC Occupational Health & Safety Regulation *Part 6 "Substance Specific Requirements"*, Section 6.6 subsections (1), (2), (3), & (4) require that a qualified person perform a Risk Assessment prior to the performance of any work that may disturb asbestos containing materials.

Prior to commencement of any work involving the disturbance of asbestos containing materials, a Notice of Project (NOP) Asbestos must be submitted to WorkSafeBC a minimum of 48 hours prior to the work commencing. In conjunction with the NOP, the Contractor must also submit a copy of this report, any bulk sample analysis results, a site-specific Risk Assessment, and site-specific work procedures.

All asbestos abatement activities must follow the guidelines outlined in the WorkSafeBC publication *Safe Work Practices for Handling Asbestos* (current edition) and must be carried out by a WorkSafeBC-Licensed contractor having qualified Level 2 and 3 Certified workers.

The removal of the sink with **asbestos containing sink mastic** should be conducted using **Moderate Risk** asbestos abatement procedures that include:

- HEPA filtered half face respirators and disposable/impermeable coveralls,
- Application of water to the asbestos debris materials being disturbed,
- Isolation of the work area, and
- Air monitoring as per WorkSafeBC requirements.

Asbestos cement piping was sometimes used for perimeter drains, storm drains and sewer lines. Bell & spigot gasket piping may contain asbestos gaskets. Knob and tube wiring insulation may also contain asbestos. These products may be encountered on the site.

4.2 Lead Containing Paints

The allowable level of lead in new paints is set by Health Canada under the Canada Consumer Protection Act, Surface Coating Materials Regulation (SOR 2005-09). Under this regulation the maximum allowable concentration of lead in new paint sold to consumers is 0.009% (90 µg/g). WorkSafeBC considers paint which contains lead at any concentration to present a potential health hazard if it is removed incorrectly.

We analyzed fourteen (14) paint samples collected from drywall, wood window trim, concrete block, and stucco. One (1) sample was lead containing, with a concentration greater than the laboratory detection limit. Analytical results are summarized in Table 2 overleaf, and lead containing samples are shown in bold.

Table 2: Summary of Lead in Paint Analytical Results – March 10, 2025

Location	Description	Lead Content (µg/g)
Upper Floor – Walls - Throughout	Beige Paint	<2*
Upper Floor – Doors/Trim	Brown Paint	<6*
Lower Floor – Parts Area – Drywall	Grey Paint	<6*
Lower Floor – Parts Area – Concrete Block	White Paint	<6*
Lower Floor – Reception – Walls	Blue Paint	<3*
Lower Floor – Office - Walls	Light Blue Paint	<5*
Lower Floor – Washrooms	Beige Paint	<2
Lower Floor – Offices – Walls	Off-White Paint	<3*
Lower Floor – Trim	Blue Paint	<5*
Maintenance Bay – Trim/Doors	Red Paint	17,500*
Exterior – Stucco	White Paint	<1*
Exterior - Stucco	Blue Paint	<2
Exterior – concrete block	Yellow Paint	<2
Shed – Siding	Grey Paint	<7

µg/g = micrograms of lead per gram of substrate

< = result is less than the limit of detection

*substrate/matrix interference possible

Untested painted surfaces are presumed lead containing until sampling and analysis determine otherwise. Lead may be present as solder on plumbing systems (bell & spigot packing) and on other fixtures such as flashings or roof vents.

The BC Occupational Health and Safety Regulation (OHSR) requires employers to have a qualified person complete a risk assessment prior to exposing workers to lead dust, fumes or mist. The employer must have an Exposure Control Plan meeting the requirements of Section 5.54 of the OHSR if the risk assessment indicates potential for lead exposure prior to commencing work. The OHSR also requires the employer to confirm that the applied controls are adequately protecting workers through personal air monitoring during lead abatement work. A qualified person may also rely on existing exposure monitoring data for assessing control measures under Section 6.59.1(4) of the OHSR.

Prior to commencement of any work involving the disturbance of lead containing materials, the employer must submit a Notice of Project (NOP) to WorkSafeBC for lead abatement projects a minimum of 48 hours prior to the work commencing. In conjunction with the NOP, the contractor must also submit a copy of this report or any lead paint bulk sample analysis results, a site-specific Risk Assessment, and safe work procedures.

To control worker exposure to lead paint particulate, any demolition, cutting, burning, grinding, sanding or other disturbance of identified lead painted surfaces should be conducted following

procedures outlined in the WorkSafeBC publication *Safe Work Practices for Handling Lead* (current edition). Procedures will vary depending on the nature of the work but should consider:

- Wearing half face respirators equipped with P100 class filters, disposable Tyvek™ or equivalent coveralls and work gloves,
- Segregating the work area with barrier tape and warning signs,
- Using drop sheets and tarps to prevent spread of lead containing dust,
- Using HEPA filter equipped vacuum cleaner(s),
- Decontaminating before eating, drinking or smoking,
- Applying water to disturbed materials,
- Filing of a “Notice of Project” with WorkSafeBC prior to significant disturbance of lead containing paint, and
- Personal full-shift worker exposure air monitoring during lead abatement.

The BC *Hazardous Waste Regulation* requires lead-containing materials destined for disposal at a licensed landfill facility to be tested for leachability to determine if they should be handled as a hazardous waste.

4.3 Leachable Metals

The BC *Hazardous Waste Regulation* requires lead containing materials to be tested for leachability prior to disposal at a licensed landfill. We recommend having lead-containing materials with concentrations over 0.01% by weight (100 µg/g or ppm) tested for lead leachability. Those materials that leach more than 5.0 milligrams of lead per liter (mg/L) must be disposed of as hazardous waste to comply with the *Hazardous Waste Regulation*.

The TCLP sample collected had a leachable lead concentration below the BC Hazardous Waste Regulation limit of 5.0 mg/L. These painted materials may be disposed of as regular construction waste.

A summary of analytical results is presented in Table 3. Laboratory results are appended.

Table 3: TCLP Analytical Results Summary – March 10, 2025

Sample ID	Description	TCLP Lead (mg/L)
TCLP-1	Red Paint on Door Trim	0.53
BC Hazardous Waste Regulation Limit for Leachable Lead		5.0

mg/L = milligrams per liter

Note: The laboratory does not carry out the TCLP analysis if the lead concentration is <100 µg/g.

4.4 Silica

We did not test building materials for silica, but we presume silica is present in concrete, concrete block, mortar, grout, ceiling tiles, ceramic tile, stucco, asphalt roofing and possibly in drywall filler compounds.

The employer must control worker exposures to crystalline silica during demolition and renovation activities. **The OHSR requires contractors to have a Silica Exposure Control Plan and Safe Work Procedures prior to work commencing that disturbs crystalline silica.**

Appropriate controls are required to mitigate worker exposure to silica dust during abrasive blasting, jackhammering, chipping, drilling, cutting, sawing or other disturbance of identified concrete, plaster or drywall walls or cementitious products. Procedures will vary depending on the nature of the work but should consider, as a minimum, the following:

- Using half-face respirators equipped with P100 class filters, disposable Tyvek™ or equivalent coveralls and work gloves,
- Continuously applying water to materials being disturbed,
- Using drop sheets and tarps to prevent spread of silica-containing dust,
- Using HEPA filter equipped vacuum(s),
- HEPA equipped negative air unit for dust suppression inside enclosures, and
- Personal full-shift worker exposure air monitoring as per WorkSafeBC requirements.

4.5 Mercury

Fluorescent lights were observed in the building. Fluorescent light tubes and bulbs containing mercury vapour should be disposed of in accordance with BC *Hazardous Waste Regulations* and/or local landfill requirements. Systems are in place that can facilitate recycling of the glass and mercury in fluorescent lights while mitigating worker exposure during the disposal process.

Mercury containing thermostats were not observed. If encountered, ensure that the glass bulb containing mercury is not damaged.

4.6 Hantavirus (and other Animal Droppings)

Rodent faeces were observed in the building. We recommend that controls listed in the WorkSafeBC publication *A Hantavirus Exposure Control Program for Employers and Workers* (current edition) are employed. **The OHSR requires contractors to have a Hantavirus Exposure Control Plan and Safe Work Procedures prior to handling/cleaning animal and rodent feces.**

4.7 CCA-Pressure Treated Wood

Pressure treated wood was not observed in the building. If encountered, the pressure treated wood should be discarded as landfill waste, or recycled responsibly. Workers should wear protection (e.g., goggles, gloves, and dust mask) when sawing, cleaning, or handling CCA-pressure treated wood, and **not** burned. Following handling, workers should properly decontaminate by washing hands/face and laundering any contaminated clothing.

4.8 Radioactive Materials

Smoke detectors were not observed.

If encountered, the contractor must ensure that the smoke detectors' sources are not damaged during upcoming renovation/demolition. Smoke detectors may be disposed of as regular household waste in accordance with Canadian Nuclear Safety Commission requirements and/or disposed of as per local landfill requirements.

4.9 Mould

Mould was not observed in the building. If encountered during demolition and/or fungal remediation activities, the contractor must ensure workers exposure to mould spores are controlled. These controls may include half or full-face respirators fitted with HEPA filtered P100 cartridges, disposable/impermeable coveralls, impermeable gloves, and eye protection. Engineered controls may include HEPA filtered negative air cabinets, HEPA filtered vacuums and amended water. All fungal investigation and remediation activities must follow WorkSafeBC Occupational Health and Safety Guideline G4.79.

4.10 Polychlorinated Biphenyls

Fluorescent light fixtures were observed in the building.

The federal government restricted the use of PCBs in light ballasts in 1981. Since this building was erected in 1988, PCB ballasts are not expected.

4.11 Ozone Depleting Substances

Older refrigeration equipment that may contain chlorofluorocarbons was not observed in the building. If encountered, the refrigerant must be removed by a qualified refrigeration specialist for disposal in accordance with the *Ozone Depleting Substances and Other Halocarbons Regulation* when the units are taken out of service.

4.12 Urea Formaldehyde Foam Insulation

Urea Formaldehyde Foam Insulation was not observed in the building. This material is not suspected of being present.

4.13 Fuel Oil Storage Tanks

Oil storage totes and a barrel (above ground) were present on the property. Empty, remove, and dispose of them in accordance with the BC Ministry of Environment and Parks Strategy publication *A Field Guide to Fuel Handling, Transportation, and Storage* (3rd Edition, February 2002).

The identification of the presence of (any) underground tanks was not included within the scope of this investigation.

4.14 Other Materials

Synthetic glass fibre insulation exists throughout the wall cavities. Removal of these materials should be conducted wearing proper respiratory protection and protective clothing including impermeable gloves, eye protection and half-face respiratory protection equipped with P-100 particulate filters.

No other hazardous, toxic, flammable, or explosive substances were observed. Owner's contents were not assessed.

4.15 Abatement Clearance Documentation

To comply with BC Occupational Health & Safety Regulation Part 20.112(8) a qualified person (Island EHS) must conduct a final inspection after all the hazardous materials identified in this report have been safely contained or removed. Once all the hazardous materials have been removed and the final inspection has been completed, a written clearance letter can be provided.

Should asbestos abatement be undertaken by unqualified persons (i.e., those not licensed / not having qualified Level 2 and 3 Certified workers) and without appropriate controls in place, the work area will require aggressive air clearance sampling. This air sampling will extend to any adjacent areas that have not been isolated from the hazard and potential contamination. Clearance letters, required to document removal of asbestos for issuance of building permits and contractors hired to work in the space, will not be granted subject to failure of this testing. The owner/client is responsible for the additional fees incurred for these services.

5.0 Closure

This document was prepared for the exclusive use of our client. All conclusions and recommendations are based upon conditions at the site at the time of this investigation. Changes may occur over time that will require a re-evaluation of the site. All conclusions and recommendations are based upon professional opinions. These opinions are in accordance with accepted industrial hygiene assessment standards and practices and comply with current WorkSafeBC requirements.

All work was carried out based on the Scope of Work that was agreed upon with the client prior to the start of work, constraints imposed by the client and availability of access to the site. A Phase 1 Environmental Site Assessment (ESA) or a Stage 1 Preliminary Site Investigation (PSI) was not part of Island EHS scope of work.

No warranty or guarantee, whether expressed or implied, are made with respect to the data or the reported findings, observations, and conclusions, which are based solely upon site conditions at the time of the investigation.

This report may not be used, relied upon, copied, published, or quoted by any parties other than McElhanney Ltd and BC Transit without the written consent of Island EHS. Other parties reading this report must independently verify the completeness and accuracy of this report and its contents.

This report is not intended as a Scope of Work for tender or bidding purposes. Any use of this report in that fashion is at the sole discretion and liability of the Owner.



Brian Salmon
Senior Occupational Hygienist
Field Investigations and Reports
Level S Certificate No.: 10002749



Ashlee McGiffin
Senior Occupational Hygienist
Original, Rev01 and Rev02 Report Reviews
Level S Certificate No.: 10002605

Appendix 1

Photographs

			
Sample:	63920-1	Sample:	63920-2
Location:	2 nd Floor – Break Room	Location:	2 nd Floor – Open Office
Description:	Acoustic Ceiling Tile 1	Description:	Acoustic Ceiling Tile 1
Asbestos:	None Detected	Asbestos:	None Detected
			
Sample:	63920-3	Sample:	63920-4
Location:	2 nd Floor – Office	Location:	2 nd Floor – Break Room
Description:	Acoustic Ceiling Tile 1	Description:	Acoustic Ceiling Tile 2
Asbestos:	None Detected	Asbestos:	None Detected



Sample: 63920-5
 Location: 2nd Floor – Break Room
 Description: Acoustic Ceiling Tile 2
 Asbestos: None Detected



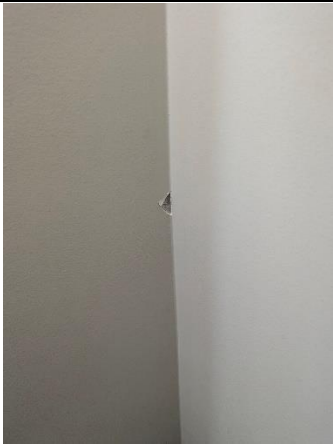
Sample: 63920-6
 Location: 2nd Floor – Break Room
 Description: Acoustic Ceiling Tile 2
 Asbestos: None Detected



Sample: 63920-7
 Location: 2nd Floor – Break Room
 Description: Acoustic Ceiling Tile 3
 Asbestos: None Detected



Sample: 63920-8
 Location: 2nd Floor – Break Room
 Description: Acoustic Ceiling Tile 3
 Asbestos: None Detected

			
Sample:	63920-9	Sample:	63920-10
Location:	2 nd Floor – Break Room	Location:	2 nd Floor – Washroom
Description:	Acoustic Ceiling Tile 3	Description:	Drywall Joint Compound
Asbestos:	None Detected	Asbestos:	None Detected
			
Sample:	63920-11	Sample:	63920-12
Location:	2 nd Floor – Open Office	Location:	2 nd Floor - Office
Description:	Drywall Joint Compound	Description:	Drywall Joint Compound
Asbestos:	None Detected	Asbestos:	None Detected

			
Sample:	63920-13	Sample:	63920-14
Location:	2 nd Floor – Office	Location:	2 nd Floor – Break Room
Description:	Drywall Joint Compound	Description:	Drywall Joint Compound
Asbestos:	None Detected	Asbestos:	None Detected
			
Sample:	63920-15	Sample:	63920-16
Location:	2 nd Floor – Office, Baseboards	Location:	2 nd Floor – Office, Baseboards
Description:	Adhesive	Description:	Adhesive
Asbestos:	None Detected	Asbestos:	None Detected

			
Sample:	63920-17	Sample:	63920-18
Location:	2 nd Floor – Office, Baseboards	Location:	2 nd Floor – Break Room
Description:	Adhesive	Description:	Acoustic Ceiling Tile 4
Asbestos:	None Detected	Asbestos:	None Detected
			
Sample:	63920-19	Sample:	63920-20
Location:	2 nd Floor – Women's Washroom	Location:	2 nd Floor – Open Office
Description:	Acoustic Ceiling Tile 4	Description:	Acoustic Ceiling Tile 4
Asbestos:	None Detected	Asbestos:	None Detected

			
Sample:	63920-21	Sample:	63920-22
Location:	2 nd Floor – Break Room, Sink	Location:	2 nd Floor
Description:	Mastic	Description:	Vinyl Sheet Flooring
Asbestos:	None Detected	Asbestos:	None Detected
No Photo Available			
Sample:	63920-23	Sample:	63920-24
Location:	2 nd Floor – Office, Deck	Location:	2 nd Floor - Windows
Description:	Vinyl Deck Membrane	Description:	Putty
Asbestos:	None Detected	Asbestos:	None Detected



Sample: 63920-25
Location: 2nd Floor - Windows
Description: Putty
Asbestos: None Detected

Sample: 63920-26
Location: 2nd Floor - Windows
Description: Putty
Asbestos: None Detected



Sample: 63920-27
Location: 2nd Floor – Balcony – Flashing
Description: Caulking – Brown
Asbestos: None Detected

Sample: 63920-28
Location: 2nd Floor – Balcony – Window
Description: Caulking – Brown
Asbestos: None Detected



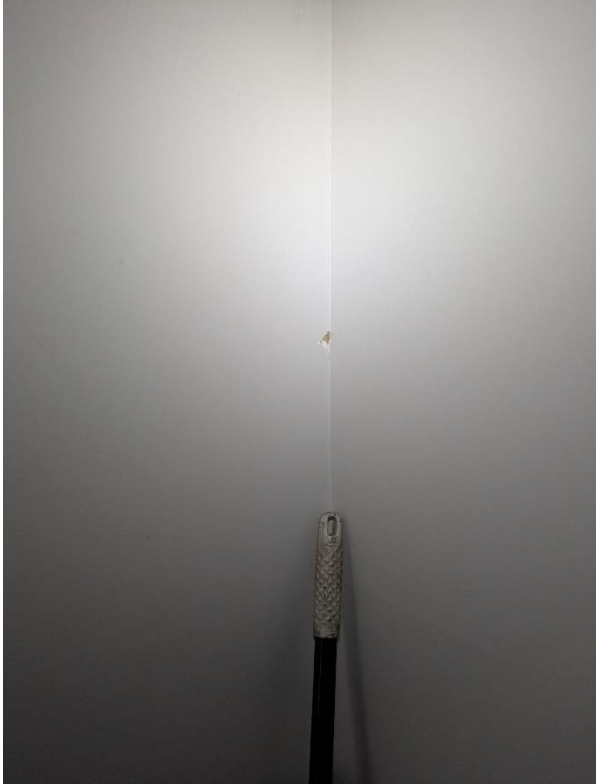
Sample: 63920-29
 Location: 2nd Floor – Balcony – Door
 Description: Caulking – Brown
 Asbestos: None Detected

Sample: 63920-30
 Location: 1st Floor – Loading Bay
 Description: Drywall Joint Compound
 Asbestos: None Detected



Sample: 63920-31
 Location: 1st Floor – Parts
 Description: Drywall Joint Compound
 Asbestos: None Detected

Sample: 63920-32
 Location: 1st Floor - Reception
 Description: Drywall Joint Compound
 Asbestos: None Detected

			
Sample:	63920-33	Sample:	63920-34
Location:	1 st Floor – Stairwell	Location:	1 st Floor – Mail Room
Description:	Drywall Joint Compo	Description:	Drywall Joint
Asbestos:	None Detected	Asbestos:	None Detected
			
Sample:	63920-35	Sample:	63920-36
Location:	1 st Floor - Office	Location:	1 st Floor - Parts
Description:	Vinyl Sheet Flooring	Description:	Concrete Block Mortar
Asbestos:	None Detected	Asbestos:	None Detected

		No Photo Available	
Sample:	63920-37	Sample:	63920-38
Location:	1 st Floor – Loading Bay #1	Location:	1 st Floor – Loading Bay #2
Description:	Concrete Block Mortar	Description:	Concrete Block Mortar
Asbestos:	None Detected	Asbestos:	None Detected
			
Sample:	63920-39	Sample:	63920-40
Location:	1 st Floor – Stairwell	Location:	1 st Floor – Reception
Description:	Stair Tread	Description:	Acoustic Ceiling Tile 1
Asbestos:	None Detected	Asbestos:	None Detected

			
Sample:	63920-41	Sample:	63920-42
Location:	1 st Floor – Mail Room	Location:	1 st Floor – Washroom
Description:	Acoustic Ceiling Tile 1	Description:	Grout
Asbestos:	None Detected	Asbestos:	None Detected
			
Sample:	63920-43	Sample:	63920-44
Location:	1 st Floor – Washroom	Location:	1 st Floor – Washroom
Description:	Grout	Description:	Grout
Asbestos:	None Detected	Asbestos:	None Detected

			
Sample:	63920-45	Sample:	63920-46
Location:	Mezzanine – Break Room, Sink	Location:	Exterior
Description:	Mastic	Description:	Stucco
Asbestos:	Chrysotile 1%	Asbestos:	None Detected
			
Sample:	63920-47	Sample:	63920-48
Location:	Exterior	Location:	Exterior
Description:	Stucco	Description:	Stucco
Asbestos:	None Detected	Asbestos:	None Detected

			
Sample:	63920-49	Sample:	63920-50
Location:	Loading Bay #3	Location:	Exterior
Description:	Stucco	Description:	Stucco
Asbestos:	None Detected	Asbestos:	None Detected
			
Sample:	63920-51	Sample:	63920-52
Location:	Roof - West Side	Location:	Roof - East Side
Description:	Torch-on Asphalt	Description:	Torch-on Asphalt
Asbestos:	None Detected	Asbestos:	None Detected



Sample: 63920-53
 Location: Roof - Central
 Description: Tar & Gravel
 Asbestos: None Detected



Sample: 63920-54
 Location: Roof - Central
 Description: Tar & Gravel
 Asbestos: None Detected



Sample: 63920-55
 Location: Roof - Central
 Description: Tar & Gravel
 Asbestos: None Detected



Sample: 63920-56
 Location: Roof - HVAC - West Side
 Description: Caulking White
 Asbestos: None Detected



Sample:	63920-57
Location:	Roof - HVAC - West Side
Description:	Caulking White
Asbestos:	None Detected

Sample:	63920-58
Location:	Roof - HVAC - West Side
Description:	Caulking White
Asbestos:	None Detected



Sample:	63920-59
Location:	Roof - Vents
Description:	Mastic - Black
Asbestos:	None Detected

Sample:	63920-60
Location:	Roof - Vents
Description:	Mastic - Black
Asbestos:	None Detected



Sample:	63920-61
Location:	Roof - Vents
Description:	Mastic - Black
Asbestos:	None Detected



Sample:	63920-62
Location:	Roof - Vents
Description:	Mastic - Grey
Asbestos:	None Detected



Sample:	63920-63
Location:	Roof - Vents
Description:	Mastic - Grey
Asbestos:	None Detected



Sample:	63920-64
Location:	Roof - Vents
Description:	Mastic - Grey
Asbestos:	None Detected



Sample: 63920-65
 Location: Roof - HVAC - East Side
 Description: Mastic - Grey
 Asbestos: None Detected



Sample: 63920-66
 Location: Roof - HVAC - East Side
 Description: Mastic - Grey
 Asbestos: None Detected



Sample: 63920-67
 Location: Roof - HVAC - East Side
 Description: Mastic - Grey
 Asbestos: None Detected



Sample: 63920-68
 Location: Roof - HVAC
 Description: Tar - Black
 Asbestos: None Detected



Sample:	63920-69	Sample:	63920-70
Location:	Roof - HVAC	Location:	Roof - HVAC
Description:	Tar - Black	Description:	Tar - Black
Asbestos:	None Detected	Asbestos:	None Detected

Appendix 2

Laboratory Results



Asbestos Bulk Sample Report

201 - 990 Hillside Avenue
Victoria, B.C. V8T 2A1
Tel: 778-406-0933
E-Mail: admin@islandehs.ca

Job: 63920
Project: 4212 Commerce Circle
Client: McElhanney
Client PO#:

Submitted By: BS
Date Received: 2025-03-10
Analyst: JT/AK

SP	#	Location	Material	Analysis Date	Layer	Description	% of Sample	Asbestos Minerals	% Asbestos per Layer	Other Fibres	% Fibres per Layer
N	1	2nd Floor - Break Room	Acoustic Ceiling Tile 1 - Random Pinhole & Divot	2025-03-18	1	White paint	5.0	None Detected	0.0	Non-fibrous	100.0
					2	Beige fibrous tile	95.0	None Detected	0.0	Non-fibrous	30.0
										Cellulose	40.0
										Glass	30.0
N	2	2nd Floor - Open Office	Acoustic Ceiling Tile 1 - Random Pinhole & Divot	2025-03-18	1	White paint	5.0	None Detected	0.0	Non-fibrous	100.0
					2	Beige fibrous tile	95.0	None Detected	0.0	Non-fibrous	30.0
										Cellulose	40.0
										Glass	30.0
N	3	2nd Floor - Office	Acoustic Ceiling Tile 1 - Random Pinhole & Divot	2025-03-18	1	White paint	5.0	None Detected	0.0	Non-fibrous	100.0
					2	Beige fibrous tile	95.0	None Detected	0.0	Non-fibrous	30.0
										Cellulose	40.0
										Glass	30.0

Asbestos Bulk Sample Report

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Job: 63920
Project: 4212 Commerce Circle
Client: McElhanney
Client PO#:

Submitted By: BS
Date Received: 2025-03-10
Analyst: JT/AK

SP	#	Location	Material	Analysis Date	Layer	Description	% of Sample	Asbestos Minerals	% Asbestos per Layer	Other Fibres	% Fibres per Layer
N	4	2nd Floor - Break Room	Acoustic Ceiling Tile 2 - Light Pinhole & Divot	2025-03-18	1	White paint	5.0	None Detected	0.0	Non-fibrous	100.0
					2	Beige fibrous tile	95.0	None Detected	0.0	Non-fibrous	30.0
										Cellulose	40.0
										Glass	30.0
N	5	2nd Floor - Break Room	Acoustic Ceiling Tile 2 - Light Pinhole & Divot	2025-03-18	1	White paint	5.0	None Detected	0.0	Non-fibrous	100.0
					2	Beige fibrous tile	95.0	None Detected	0.0	Non-fibrous	30.0
										Cellulose	40.0
										Glass	30.0
N	6	2nd Floor - Break Room	Acoustic Ceiling Tile 2 - Light Pinhole & Divot	2025-03-18	1	White paint	5.0	None Detected	0.0	Non-fibrous	100.0
					2	Beige fibrous tile	95.0	None Detected	0.0	Non-fibrous	30.0
										Cellulose	40.0
										Glass	30.0
N	7	2nd Floor - Break Room	Acoustic Ceiling Tile 3 - Heavy Pinhole & Divot	2025-03-18	1	White paint	5.0	None Detected	0.0	Non-fibrous	100.0
					2	Beige fibrous tile	95.0	None Detected	0.0	Non-fibrous	30.0



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Project: 4212 Commerce Circle
Client: McElhanney
Client PO#:

Submitted By: BS
Date Received: 2025-03-10
Analyst: JT/AK

SP	#	Location	Material	Analysis Date	Layer	Description	% of Sample	Asbestos Minerals	% Asbestos per Layer	Other Fibres	% Fibres per Layer
N	8	2nd Floor - Break Room	Acoustic Ceiling Tile 3 - Heavy Pinhole & Divot	2025-03-18	1	White paint	5.0	None Detected	0.0	Cellulose	40.0
										Glass	30.0
										Non-fibrous	100.0
					2	Beige fibrous tile	95.0	None Detected	0.0	Non-fibrous	30.0
										Cellulose	40.0
										Glass	30.0
N	9	2nd Floor - Break Room	Acoustic Ceiling Tile 3 - Heavy Pinhole & Divot	2025-03-18	1	White paint	5.0	None Detected	0.0	Non-fibrous	100.0
					2	Beige fibrous tile	95.0	None Detected	0.0	Non-fibrous	30.0
										Cellulose	40.0
										Glass	30.0
										Non-fibrous	100.0
										Cellulose	40.0
N	10	2nd Floor - Washroom	Drywall Joint Compound	2025-03-18	1	Off-white paint	10.0	None Detected	0.0	Non-fibrous	100.0
					2	White chalky	30.0	None Detected	0.0	Non-fibrous	100.0
										Cellulose	100.0
										Non-fibrous	70.0
					3	Beige fibrous	10.0	None Detected	0.0	Cellulose	100.0
										Non-fibrous	70.0

Asbestos Bulk Sample Report

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Job: 63920
Project: 4212 Commerce Circle
Client: McElhanney
Client PO#:

Submitted By: BS
Date Received: 2025-03-10
Analyst: JT/AK

SP	#	Location	Material	Analysis Date	Layer	Description	% of Sample	Asbestos Minerals	% Asbestos per Layer	Other Fibres	% Fibres per Layer
										Cellulose	30.0
N	11	2nd Floor - Open Office	Drywall Joint Compound	2025-03-18	1	Off-white paint	10.0	None Detected	0.0	Non-fibrous	100.0
					2	White chalky	30.0	None Detected	0.0	Non-fibrous	100.0
					3	Beige fibrous	10.0	None Detected	0.0	Cellulose	100.0
					4	Drywall	50.0	None Detected	0.0	Non-fibrous	70.0
										Cellulose	30.0
N	12	2nd Floor - Office	Drywall Joint Compound	2025-03-18	1	White paint	40.0	None Detected	0.0	Non-fibrous	100.0
					2	White chalky	60.0	None Detected	0.0	Non-fibrous	100.0
N	13	2nd Floor - Office	Drywall Joint Compound	2025-03-18	1	Off-white paint	20.0	None Detected	0.0	Non-fibrous	100.0
					2	White chalky	80.0	None Detected	0.0	Non-fibrous	100.0
N	14	2nd Floor - Break Room	Drywall Joint Compound	2025-03-18	1	White paint	20.0	None Detected	0.0	Non-fibrous	100.0
					2	White chalky	30.0	None Detected	0.0	Non-fibrous	100.0
					3	Beige fibrous	20.0	None Detected	0.0	Cellulose	100.0
					4	Drywall	30.0	None Detected	0.0	Non-fibrous	70.0
										Cellulose	30.0

Asbestos Bulk Sample Report

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Job: 63920
Project: 4212 Commerce Circle
Client: McElhanney
Client PO#:

Submitted By: BS
Date Received: 2025-03-10
Analyst: JT/AK

SP #	Location	Material	Analysis Date	Layer	Description	% of Sample	Asbestos Minerals	% Asbestos per Layer	Other Fibres	% Fibres per Layer
N 15	2nd Floor - Office, Baseboards	Adhesive	2025-03-18	1	Yellow adhesive	80.0	None Detected	0.0	Non-fibrous	100.0
				2	White chalky	20.0	None Detected	0.0	Non-fibrous	100.0
N 16	2nd Floor - Office, Baseboards	Adhesive	2025-03-18	1	Yellow adhesive	50.0	None Detected	0.0	Non-fibrous	100.0
				2	Transparent adhesive	30.0	None Detected	0.0	Non-fibrous	100.0
				3	White chalky	20.0	None Detected	0.0	Non-fibrous	100.0
N 17	2nd Floor - Office, Baseboards	Adhesive	2025-03-18	1	Yellow adhesive	100.0	None Detected	0.0	Non-fibrous	100.0
N 18	2nd Floor - Break Room	Acoustic Ceiling Tile 4 - Directional Fissure	2025-03-18	1	White paint	5.0	None Detected	0.0	Non-fibrous	100.0
				2	Beige fibrous tile	95.0	None Detected	0.0	Non-fibrous	30.0
									Cellulose	40.0
									Glass	30.0
N 19	2nd Floor - Women's Washroom	Acoustic Ceiling Tile 4 - Directional Fissure	2025-03-18	1	White paint	5.0	None Detected	0.0	Non-fibrous	100.0
				2	Beige fibrous tile	95.0	None Detected	0.0	Non-fibrous	30.0
									Cellulose	40.0
									Glass	30.0

Asbestos Bulk Sample Report

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Victoria, B.C. V8T 2A1
Tel: 778-406-0933
E-Mail: admin@islandehs.ca

Job: 63920
Project: 4212 Commerce Circle
Client: McElhanney
Client PO#:

Submitted By: BS
Date Received: 2025-03-10
Analyst: JT/AK

SP #	Location	Material	Analysis Date	Layer	Description	% of Sample	Asbestos Minerals	% Asbestos per Layer	Other Fibres	% Fibres per Layer
N 20	2nd Floor - Open Office	Acoustic Ceiling Tile 4 - Directional Fissure	2025-03-18	1	White paint	5.0	None Detected	0.0	Non-fibrous	100.0
				2	Beige fibrous tile	95.0	None Detected	0.0	Non-fibrous	30.0
									Cellulose	40.0
									Glass	30.0
N 21	2nd Floor - Break Room, Sink	Mastic	2025-03-18	1	White mastic	100.0	None Detected	0.0	Non-fibrous	100.0
N 22	2nd Floor - Throughout Upper Floor	Vinyl Sheet Flooring	2025-03-18	1	Grey flooring	50.0	None Detected	0.0	Non-fibrous	100.0
				2	Grey fibrous backing	50.0	None Detected	0.0	Non-fibrous	60.0
									Synthetic	20.0
									Cellulose	20.0
N 23	2nd Floor - Office, Deck	Vinyl Deck Membrane	2025-03-18	1	Grey-beige vinyl; pliable	80.0	None Detected	0.0	Non-fibrous	100.0
				2	Purple fibrous backing	17.0	None Detected	0.0	Synthetic	100.0
				3	Wood	3.0	None Detected	0.0	Cellulose	100.0
N 24	2nd Floor - Upper Floor Windows	Putty	2025-03-18	1	Black putty	100.0	None Detected	0.0	Non-fibrous	100.0

Asbestos Bulk Sample Report

201 - 990 Hillside Avenue
Victoria, B.C. V8T 2A1
Tel: 778-406-0933
E-Mail: admin@islandehs.ca

Job: 63920
Project: 4212 Commerce Circle
Client: McElhanney
Client PO#:

Submitted By: BS
Date Received: 2025-03-10
Analyst: JT/AK

SP #	Location	Material	Analysis Date	Layer	Description	% of Sample	Asbestos Minerals	% Asbestos per Layer	Other Fibres	% Fibres per Layer
N 25	2nd Floor - Upper Floor Windows	Putty	2025-03-18	1	Black putty	100.0	None Detected	0.0	Non-fibrous	100.0
N 26	2nd Floor - Upper Floor Windows	Putty	2025-03-18	1	Black putty	100.0	None Detected	0.0	Non-fibrous	100.0
N 27	2nd Floor - Balcony - Flashing	Caulking - Brown	2025-03-18	1	Brown caulking	100.0	None Detected	0.0	Non-fibrous	100.0
N 28	2nd Floor - Balcony - Window	Caulking - Brown	2025-03-18	1	Brown caulking	100.0	None Detected	0.0	Non-fibrous	100.0
N 29	2nd Floor - Balcony - Door	Caulking - Brown	2025-03-18	1	Brown caulking	100.0	None Detected	0.0	Non-fibrous	100.0
N 30	1st Floor - Loading Bay	Drywall Joint Compound	2025-03-20	1	Grey paint	25.0	None Detected	0.0	Non-fibrous	100.0
				2	White chalky	75.0	None Detected	0.0	Non-fibrous	90.0
									Cellulose	10.0
N 31	1st Floor - Parts	Drywall Joint Compound	2025-03-20	1	Grey paint	30.0	None Detected	0.0	Non-fibrous	100.0
				2	White chalky	70.0	None Detected	0.0	Non-fibrous	90.0
									Cellulose	10.0
N 32	1st Floor - Reception	Drywall Joint Compound	2025-03-20	1	Blue paint	20.0	None Detected	0.0	Non-fibrous	100.0



Asbestos Bulk Sample Report

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Project: 4212 Commerce Circle
Client: McElhanney
Client PO#:

Submitted By: BS
Date Received: 2025-03-10
Analyst: JT/AK

SP	#	Location	Material	Analysis Date	Layer	Description	% of Sample	Asbestos Minerals	% Asbestos per Layer	Other Fibres	% Fibres per Layer
					2	White chalky	80.0	None Detected	0.0	Non-fibrous	90.0
										Cellulose	10.0
N	33	1st Floor - Stairwell	Drywall Joint Compound	2025-03-20	1	Beige paint	25.0	None Detected	0.0	Non-fibrous	100.0
					2	White chalky	75.0	None Detected	0.0	Non-fibrous	90.0
										Cellulose	10.0
N	34	1st Floor - Mail Room	Drywall Joint Compound	2025-03-20	1	White paint	15.0	None Detected	0.0	Non-fibrous	100.0
					2	White chalky	45.0	None Detected	0.0	Non-fibrous	90.0
										Cellulose	10.0
					3	Drywall	30.0	None Detected	0.0	Non-fibrous	60.0
										Cellulose	25.0
										Synthetic/glass	15.0
N	35	1st Floor - Office	Vinyl Sheet Flooring	2025-03-20	1	Grey top wear surface	25.0	None Detected	0.0	Non-fibrous	100.0
					2	Grey fibrous backing	65.0	None Detected	0.0	Cellulose	35.0
										Synthetic/glass	35.0
										Non-fibrous	30.0

Asbestos Bulk Sample Report

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SP #	Location	Material	Analysis Date	Layer	Description	% of Sample	Asbestos Minerals	% Asbestos per Layer	Other Fibres	% Fibres per Layer
N 36	1st Floor - Parts	Concrete Black Mortar	2025-03-20	1	Grey cement	100.0	None Detected	0.0	Non-fibrous	85.0
									Cellulose	15.0
N 37	1st Floor - Loading Bay #1	Concrete Black Mortar	2025-03-20	1	Grey cement	100.0	None Detected	0.0	Non-fibrous	85.0
									Cellulose	15.0
N 38	1st Floor - Loading Bay #2	Concrete Black Mortar	2025-03-20	1	Grey cement	100.0	None Detected	0.0	Non-fibrous	85.0
									Cellulose	15.0
N 39	1st Floor - Stairwell	Stair Tread	2025-03-20	1	Brown cahlky	100.0	None Detected	0.0	Non-fibrous	757.0
									Cellulose	15.0
									Synthetic/glass	10.0
N 40	1st Floor - Reception	Acoustic Ceiling Tile 1 - Random Pinhole & Divot	2025-03-20	1	White paint	5.0	None Detected	0.0	Non-fibrous	100.0
				2	Brown fibrous	95.0	None Detected	0.0	Cellulose	40.0
									Synthetic/glass	35.0
									Non-fibrous	25.0

Asbestos Bulk Sample Report

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SP #	Location	Material	Analysis Date	Layer	Description	% of Sample	Asbestos Minerals	% Asbestos per Layer	Other Fibres	% Fibres per Layer
N 41	1st Floor - Mail Room	Acoustic Ceiling Tile 1 - Random Pinhole & Divot	2025-03-20	1	White paint	5.0	None Detected	0.0	Non-fibrous	100.0
				2	Brown fibrous	95.0	None Detected	0.0	Cellulose	40.0
									Synthetic/glass	35.0
									Non-fibrous	25.0
N 42	1st Floor - Washroom	Grout	2025-03-20	1	White cement	100.0	None Detected	0.0	Non-fibrous	90.0
									Cellulose	10.0
N 43	1st Floor - Washroom	Grout	2025-03-20	1	White cement	100.0	None Detected	0.0	Non-fibrous	90.0
									Cellulose	10.0
N 44	1st Floor - Washroom	Grout	2025-03-20	1	White cement	100.0	None Detected	0.0	Non-fibrous	90.0
									Cellulose	10.0
N 45	Mezzanine - Break Room, Sink	Mastic	2025-03-20	1	Black/yellow powder	100.0	Chrysotile	1.0	Non-fibrous	79.0
									Cellulose	20.0
N 46	Exterior	Stucco	2025-03-20	1	White cement	100.0	None Detected	0.0	Non-fibrous	90.0



Asbestos Bulk Sample Report

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SP	#	Location	Material	Analysis Date	Layer	Description	% of Sample	Asbestos Minerals	% Asbestos per Layer	Other Fibres	% Fibres per Layer
					2	Grey cement	100.0	None Detected	0.0	Cellulose	10.0
										Non-fibrous	85.0
										Cellulose	15.0
N	47	Exterior	Stucco	2025-03-20	1	White cement	100.0	None Detected	0.0	Non-fibrous	90.0
					2	Grey cement	100.0	None Detected	0.0	Cellulose	10.0
										Non-fibrous	85.0
										Cellulose	15.0
N	48	Exterior	Stucco	2025-03-20	1	White cement	100.0	None Detected	0.0	Non-fibrous	90.0
					2	Grey cement	100.0	None Detected	0.0	Cellulose	10.0
										Non-fibrous	85.0
										Cellulose	15.0
N	49	Loading Bay #3	Stucco	2025-03-20	1	White cement	100.0	None Detected	0.0	Non-fibrous	90.0
					2	Grey cement	100.0	None Detected	0.0	Cellulose	10.0
										Non-fibrous	85.0
										Cellulose	15.0



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SP	#	Location	Material	Analysis Date	Layer	Description	% of Sample	Asbestos Minerals	% Asbestos per Layer	Other Fibres	% Fibres per Layer
N	50	Exterior	Stucco	2025-03-20	1	White paint	10.0	None Detected	0.0	Non-fibrous	100.0
										Cellulose	10.0
N	51	Roof - West Side	Torch-on Asphalt	2025-05-07	1	Black roofing with brown aggregates	40.0	None Detected	0.0	Non-fibrous	85.0
										Synthetic	15.0
					2	Black fibrous/tar material; layered	60.0	None Detected	0.0	Non-fibrous	80.0
										Synthetic	20.0
N	52	Roof - East Side	Torch-on Asphalt	2025-05-07	1	Black roofing with brown aggregates	40.0	None Detected	0.0	Non-fibrous	85.0
										Synthetic	15.0
					2	Black fibrous/tar material; layered	40.0	None Detected	0.0	Non-fibrous	80.0
										Synthetic	20.0
					3	Black fibrous/tar paper	20.0	None Detected	0.0	Non-fibrous	60.0
										Glass	40.0
N	53	Roof - Central	Tar & Gravel	2025-05-07	1	Black tar/gravel roofing	40.0	None Detected	0.0	Non-fibrous	90.0
										Cellulose	10.0
					2	Black fibrous/tar material	60.0	None Detected	0.0	Non-fibrous	70.0

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SP	#	Location	Material	Analysis Date	Layer	Description	% of Sample	Asbestos Minerals	% Asbestos per Layer	Other Fibres	% Fibres per Layer
N	54	Roof - Central	Tar & Gravel	2025-05-07	1	Black tar/gravel roofing	40.0	None Detected	0.0	Cellulose	30.0
					1	Black tar/gravel roofing	40.0	None Detected	0.0	Non-fibrous	90.0
					2	Black fibrous/tar material	60.0	None Detected	0.0	Cellulose	10.0
					2	Black fibrous/tar material	60.0	None Detected	0.0	Non-fibrous	70.0
N	55	Roof - Central	Tar & Gravel	2025-05-07	1	Black tar/gravel roofing	40.0	None Detected	0.0	Cellulose	30.0
					1	Black tar/gravel roofing	40.0	None Detected	0.0	Non-fibrous	90.0
					2	Black fibrous/tar material	60.0	None Detected	0.0	Cellulose	10.0
					2	Black fibrous/tar material	60.0	None Detected	0.0	Non-fibrous	70.0
N	56	Roof - HVAC - West Side	Cauling White	2025-05-07	1	White caulking	100.0	None Detected	0.0	Cellulose	30.0
					1	White caulking	100.0	None Detected	0.0	Non-fibrous	100.0
					1	White caulking	100.0	None Detected	0.0	Non-fibrous	100.0
					1	White caulking	100.0	None Detected	0.0	Non-fibrous	100.0
N	57	Roof - HVAC - West Side	Cauling White	2025-05-07	1	White caulking	100.0	None Detected	0.0	Non-fibrous	100.0
					1	White caulking	100.0	None Detected	0.0	Non-fibrous	100.0
					1	White caulking	100.0	None Detected	0.0	Non-fibrous	100.0
					1	White caulking	100.0	None Detected	0.0	Non-fibrous	100.0
N	58	Roof - HVAC - West Side	Cauling White	2025-05-07	1	White caulking	100.0	None Detected	0.0	Non-fibrous	100.0
					1	White caulking	100.0	None Detected	0.0	Non-fibrous	100.0
					1	White caulking	100.0	None Detected	0.0	Non-fibrous	100.0
					1	White caulking	100.0	None Detected	0.0	Non-fibrous	100.0
N	59	Roof - Vents	Mastic - Black	2025-05-07	1	Black mastic	100.0	None Detected	0.0	Non-fibrous	100.0
					1	Black mastic	100.0	None Detected	0.0	Non-fibrous	100.0
					1	Black mastic	100.0	None Detected	0.0	Non-fibrous	100.0
					1	Black mastic	100.0	None Detected	0.0	Non-fibrous	100.0

Asbestos Bulk Sample Report

201 - 990 Hillside Avenue
Victoria, B.C. V8T 2A1
Tel: 778-406-0933
E-Mail: admin@islandehs.ca

Job: 63920
Project: 4212 Commerce Circle
Client: McElhanney
Client PO#:

Submitted By: BS
Date Received: 2025-03-10
Analyst: JT/AK

SP #	Location	Material	Analysis Date	Layer	Description	% of Sample	Asbestos Minerals	% Asbestos per Layer	Other Fibres	% Fibres per Layer
N 60	Roof - Vents	Mastic - Black	2025-05-07	1	Black mastic	100.0	None Detected	0.0	Non-fibrous	100.0
N 61	Roof - Vents	Mastic - Black	2025-05-07	1	Black mastic	100.0	None Detected	0.0	Non-fibrous	100.0
N 62	Roof - Vents	Mastic - Grey	2025-05-07	1	Grey mastic	100.0	None Detected	0.0	Non-fibrous	100.0
N 63	Roof - Vents	Mastic - Grey	2025-05-07	1	Grey mastic	100.0	None Detected	0.0	Non-fibrous	100.0
N 64	Roof - Vents	Mastic - Grey	2025-05-07	1	Grey mastic	100.0	None Detected	0.0	Non-fibrous	100.0
N 65	Roof - HVAC - East Side	Mastic - Grey	2025-05-07	1	Grey mastic	100.0	None Detected	0.0	Non-fibrous	100.0
N 66	Roof - HVAC - East Side	Mastic - Grey	2025-05-07	1	Grey mastic	100.0	None Detected	0.0	Non-fibrous	100.0
N 67	Roof - HVAC - East Side	Mastic - Grey	2025-05-07	1	Grey mastic	100.0	None Detected	0.0	Non-fibrous	100.0
N 68	Roof - HVAC	Tar - Black	2025-05-07	1	Black tar	100.0	None Detected	0.0	Non-fibrous	90.0
									Cellulose	10.0
N 69	Roof - HVAC	Tar - Black	2025-05-07	1	Black tar	100.0	None Detected	0.0	Non-fibrous	100.0



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Date Received: 2025-03-10
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SP	#	Location	Material	Analysis Date	Layer	Description	% of Sample	Asbestos Minerals	% Asbestos per Layer	Other Fibres	% Fibres per Layer
N	70	Roof - HVAC	Tar - Black	2025-05-07	1	Black tar	50.0	None Detected	0.0	Non-fibrous	100.0
					2	Grey mastic	50.0	None Detected	0.0	Non-fibrous	80.0
										Cellulose	20.0



Island Environmental Health and Safety
 201 - 990 Hillside Avenue
 Victoria B.C, V8T 2A1
 (778)406-0933
admin@islandehs.ca

Certificate of Analysis

Client Name	McElhanney	Report #	63920
Site Address	4212 Commerce Circle	Report Date	3/24/2025
Collection Date	3/10/2025	PO	
Collected by	BS/BR	Notes	

Analysis Summary: Lead in Paint

Sample #	Pb1	Result (ug/g)	<2
Location	Upper Floor - Walls - Throughout		
Description	Beige Paint	Comments	Possible substrate interference
Sample #	Pb2	Result (ug/g)	<6
Location	Upper Floor - Doors/Trim		
Description	Brown Paint	Comments	Possible substrate interference
Sample #	Pb3	Result (ug/g)	<6
Location	Lower Floor - Parts Area - Drywall		
Description	Grey Paint	Comments	Possible substrate interference
Sample #	Pb4	Result (ug/g)	<6
Location	Lower Floor - Parts Area - Concrete Block		
Description	White Paint	Comments	Possible substrate interference
Sample #	Pb5	Result (ug/g)	<3
Location	Lower Floor - Reception - Walls		
Description	Blue Paint	Comments	Possible substrate interference
Sample #	Pb6	Result (ug/g)	<5
Location	Lower Floor - Office - Walls		
Description	Light Blue Paint	Comments	Possible substrate interference

Notes

Results in green are below the limit of quantitation for that sample (not detectable)
 Results in red are above the limit of quantitation for that sample (detectable)

Analysed using ASTM E1645-01 and EPA 7000B

AIHA ELPAT Lab ID: 214686



Island Environmental Health and Safety
 201 - 990 Hillside Avenue
 Victoria B.C, V8T 2A1
 (778)406-0933
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Certificate of Analysis

Client Name	McElhanney	Report #	63920
Site Address	4212 Commerce Circle	Report Date	3/24/2025
Collection Date	3/10/2025	PO	
Collected by	BS/BR	Notes	

Analysis Summary: Lead in Paint

Sample #	Pb7	Result (ug/g)	<2
Location	Lower Floor - Washrooms		
Description	Beige Paint	Comments	
Sample #	Pb8	Result (ug/g)	<3
Location	Lower Floor - Offices - Walls		
Description	Off White Paint	Comments	Possible substrate interference
Sample #	Pb9	Result (ug/g)	<5
Location	Lower Floor - Trim		
Description	Blue Paint	Comments	Possible substrate interference
Sample #	Pb10	Result (ug/g)	17500
Location	Maintenance Bay - Trim/Doors		
Description	Red Paint	Comments	Possible substrate interference
Sample #	Pb11	Result (ug/g)	<1
Location	Exterior - Stucco		
Description	White Paint	Comments	Possible substrate interference
Sample #	Pb12	Result (ug/g)	<2
Location	Exterior - Stucco		
Description	Blue Paint	Comments	

Notes

Results in **green** are below the limit of quantitation for that sample (not detectable)

Results in **red** are above the limit of quantitation for that sample (detectable)

Analysed using ASTM E1645-01 and EPA 7000B

AIHA ELPAT Lab ID: 214686



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 Victoria B.C, V8T 2A1
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Certificate of Analysis

Client Name	McElhanney	Report #	63920
Site Address	4212 Commerce Circle	Report Date	3/24/2025
Collection Date	3/10/2025	PO	
Collected by	BS/BR	Notes	

Analysis Summary: Lead in Paint

Sample #	Pb13	Result (ug/g)	<2
Location	Exterior - Concrtee Block		
Description	Yellow Paint	Comments	
Sample #	Pb14	Result (ug/g)	<7
Location	Shed - Siding		
Description	Grey Paint	Comments	Possible substrate interference

Island Environmental Health & Safety Ltd.

Notes

Results in green are below the limit of quantitation for that sample (not detectable)

Results in red are above the limit of quantitation for that sample (detectable)

Analysed using ASTM E1645-01 and EPA 7000B



Lead in Paint Report



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Certificate of Analysis

Client Name	McElhanney	Report #	63920
Site Address	4212 Commerce Circle	Report Date	3/24/2025
Collection Date	3/10/2025	PO	
Technician	BS/BR	Notes	

Quality Assurance Report

	Result	Unit	Limits	Pass/Fail?
Duplicate	1	Rel. % Diff.	0% - 15%	PASS
CRM	88	% recovery	80% - 120%	PASS
QCS	99	% recovery	90% - 110%	PASS
MS	101	% recovery	80% - 120%	PASS
LRB	<0.06	mg/L	<0.242 mg/L	PASS

Duplicate: Paired analysis of a two portions of the same sample. Used to evaluate the variance in the measurement and homogeneity of the sample.

Certified Reference Material (CRM): A paint sample of known lead concentration prepared by an external agency. Used as an independent check of method accuracy.

Quality Control Sample (QCS): A blank matrix sample to which a known amount of lead from a second source has been added. Used to verify instrument calibration.

Matrix Spike (MS): A portion of a sample to which a known amount of lead is added before digestion. Used to evaluate matrix effects of the sample.

Laboratory Reagent Blank (LRB): A blank matrix containing all reagents used in the analytical procedure. Used to identify laboratory contamination.

Results relate only to the items tested

A handwritten signature in blue ink, appearing to read "Laura Martin".

Laura Martin
Laboratory Analyst

End of Report



Your Project #: 63920
Site Location: 4212 COMMERCE CIRCLE
Your C.O.C. #: 10F1

Attention: Brian Ross

ISLAND EHS
201-990 HILLSIDE AVE
VICTORIA, BC
CANADA V8T 2A1

Report Date: 2025/07/04
Report #: R3682021
Version: 1 - Final

CERTIFICATE OF ANALYSIS

BUREAU VERITAS JOB #: C558883

Received: 2025/07/02, 14:43

Sample Matrix: Bulk
Samples Received: 1

Analyses	Quantity	Date	Date	Laboratory Method	Analytical Method
		Extracted	Analyzed		
ICP-AES Metals in TCLP Leachate	1	2025/07/04	2025/07/04	BBY7SOP-00018	EPA 6010d m
TCLP pH Measurements	1	N/A	2025/07/04	BBY7SOP-00005	EPA 1311

Remarks:

Bureau Veritas is accredited to ISO/IEC 17025 for specific parameters on scopes of accreditation. Unless otherwise noted, procedures used by Bureau Veritas are based upon recognized Provincial, Federal or US method compendia such as CCME, EPA, APHA or the Quebec Ministry of Environment.

All work recorded herein has been done in accordance with procedures and practices ordinarily exercised by professionals in Bureau Veritas' profession using accepted testing methodologies, quality assurance and quality control procedures (except where otherwise agreed by the client and Bureau Veritas in writing). All data is in statistical control and has met quality control and method performance criteria unless otherwise noted. All method blanks are reported; unless indicated otherwise, associated sample data are not blank corrected. Where applicable, unless otherwise noted, Measurement Uncertainty has not been accounted for when stating conformity to the referenced standard.

Bureau Veritas liability is limited to the actual cost of the requested analyses, unless otherwise agreed in writing. There is no other warranty expressed or implied. Bureau Veritas has been retained to provide analysis of samples provided by the Client using the testing methodology referenced in this report. Interpretation and use of test results are the sole responsibility of the Client and are not within the scope of services provided by Bureau Veritas, unless otherwise agreed in writing. Bureau Veritas is not responsible for the accuracy or any data impacts, that result from the information provided by the customer or their agent.

Solid sample results, except biota, are based on dry weight unless otherwise indicated. Organic analyses are not recovery corrected except for isotope dilution methods.

Results relate to samples tested. When sampling is not conducted by Bureau Veritas, results relate to the supplied samples tested.

This Certificate shall not be reproduced except in full, without the written approval of the laboratory.

Reference Method suffix "m" indicates test methods incorporate validated modifications from specific reference methods to improve performance.

* RPDs calculated using raw data. The rounding of final results may result in the apparent difference.



Your Project #: 63920
Site Location: 4212 COMMERCE CIRCLE
Your C.O.C. #: 10F1

Attention: Brian Ross

ISLAND EHS
201-990 HILLSIDE AVE
VICTORIA, BC
CANADA V8T 2A1

Report Date: 2025/07/04
Report #: R3682021
Version: 1 - Final

CERTIFICATE OF ANALYSIS

BUREAU VERITAS JOB #: C558883

Received: 2025/07/02, 14:43

Encryption Key

Please direct all questions regarding this Certificate of Analysis to:

Shanaz Akbar, Customer Solutions Representative

Email: Shanaz.Akbar@bureauveritas.com

Phone# (604) 734 7276

=====

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ELEMENTS BY ATOMIC SPECTROSCOPY (BULK)

Bureau Veritas ID		DOF544	
Sampling Date		2025/07/02 11:00	
COC Number		10F1	
	UNITS	63920-INTERIOR TRIM (RED) TCLP	QC Batch
TCLP Extraction Procedure			
Initial pH of Sample	pH	5.97	C008748
pH after HCl	pH	1.65	C008748
Final pH of Leachate	pH	5.10	C008748
pH of Leaching Fluid	pH	4.93	C008748



TCLP LEAD BY ICP (BULK)

Bureau Veritas ID		DOF544		
Sampling Date		2025/07/02 11:00		
COC Number		1OF1		
	UNITS	63920-INTERIOR TRIM (RED) TCLP	RDL	QC Batch
Metals				
Leachate Lead (Pb)	mg/L	0.53	0.30	C009213
RDL = Reportable Detection Limit				



**BUREAU
VERITAS**

Bureau Veritas Job #: C558883
Report Date: 2025/07/04

ISLAND EHS
Client Project #: 63920
Site Location: 4212 COMMERCE CIRCLE

GENERAL COMMENTS

Results relate only to the items tested.



BUREAU
VERITAS

Bureau Veritas Job #: C558883

Report Date: 2025/07/04

QUALITY ASSURANCE REPORT

ISLAND EHS

Client Project #: 63920

Site Location: 4212 COMMERCE CIRCLE

QC Batch	Parameter	Date	Matrix Spike		Spiked Blank		Method Blank		RPD	
			% Recovery	QC Limits	% Recovery	QC Limits	Value	UNITS	Value (%)	QC Limits
C008748	Final pH of Leachate	2025/07/04					4.93	pH	0.51	N/A
C008748	Initial pH of Sample	2025/07/04					4.95	pH	0.49	N/A
C008748	pH after HCl	2025/07/04							1.6	N/A
C008748	pH of Leaching Fluid	2025/07/04					4.93	pH	0	N/A
C009213	Leachate Lead (Pb)	2025/07/04	91	75 - 125	95	75 - 125	<0.30	mg/L	NC	40

N/A = Not Applicable

Duplicate: Paired analysis of a separate portion of the same sample. Used to evaluate the variance in the measurement.

Matrix Spike: A sample to which a known amount of the analyte of interest has been added. Used to evaluate sample matrix interference.

Spiked Blank: A blank matrix sample to which a known amount of the analyte, usually from a second source, has been added. Used to evaluate method accuracy.

Method Blank: A blank matrix containing all reagents used in the analytical procedure. Used to identify laboratory contamination.

NC (Duplicate RPD): The duplicate RPD was not calculated. The concentration in the sample and/or duplicate was too low to permit a reliable RPD calculation (absolute difference $\leq 2 \times \text{RDL}$).



BUREAU
VERITAS

Bureau Veritas Job #: C558883

Report Date: 2025/07/04

ISLAND EHS

Client Project #: 63920

Site Location: 4212 COMMERCE CIRCLE

VALIDATION SIGNATURE PAGE

The analytical data and all QC contained in this report were reviewed and validated by:

Mauro Oselin, P.Chem., QP, Scientific Specialist

Bureau Veritas has procedures in place to guard against improper use of the electronic signature and have the required "signatories", as per ISO/IEC 17025, signing the reports. For Service Group specific validation, please refer to the Validation Signatures page if included, otherwise available by request. For Department specific Analyst/Supervisor validation names, please refer to the Test Summary section if included, otherwise available by request. This report is authorized by Rob Gilbert, BBY General Manager responsible for British Columbia Environmental laboratory operations.



Burnaby: 4606 Canada Way, Burnaby, BC V5G 1K5 Toll Free (800) 665 8566
Victoria: 460 Tennyson Place, Unit 1, Victoria, BC V8Z 6S8 Toll Free (866) 385-6112
bvlab.com

CHAIN OF CUSTODY RECORD

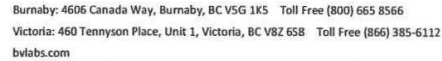
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COC-1020



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Phone/Fax: 778-406-0933				Phone/Fax: 778-406-0933				Project #: 63920				☐ 1 Day ☐ 3-4 Days																																																																																																																																																																																																																																																																				
Email: accountspayable@islandehs.ca				Email: bross@islandehs.ca				Site Location: 4212 Commerce Circle				Date Required:																																																																																																																																																																																																																																																																				
Copies:				Copies: bsalmon@islandehs.ca				Site #: Brian Ross				Rush Confirmation #:																																																																																																																																																																																																																																																																				
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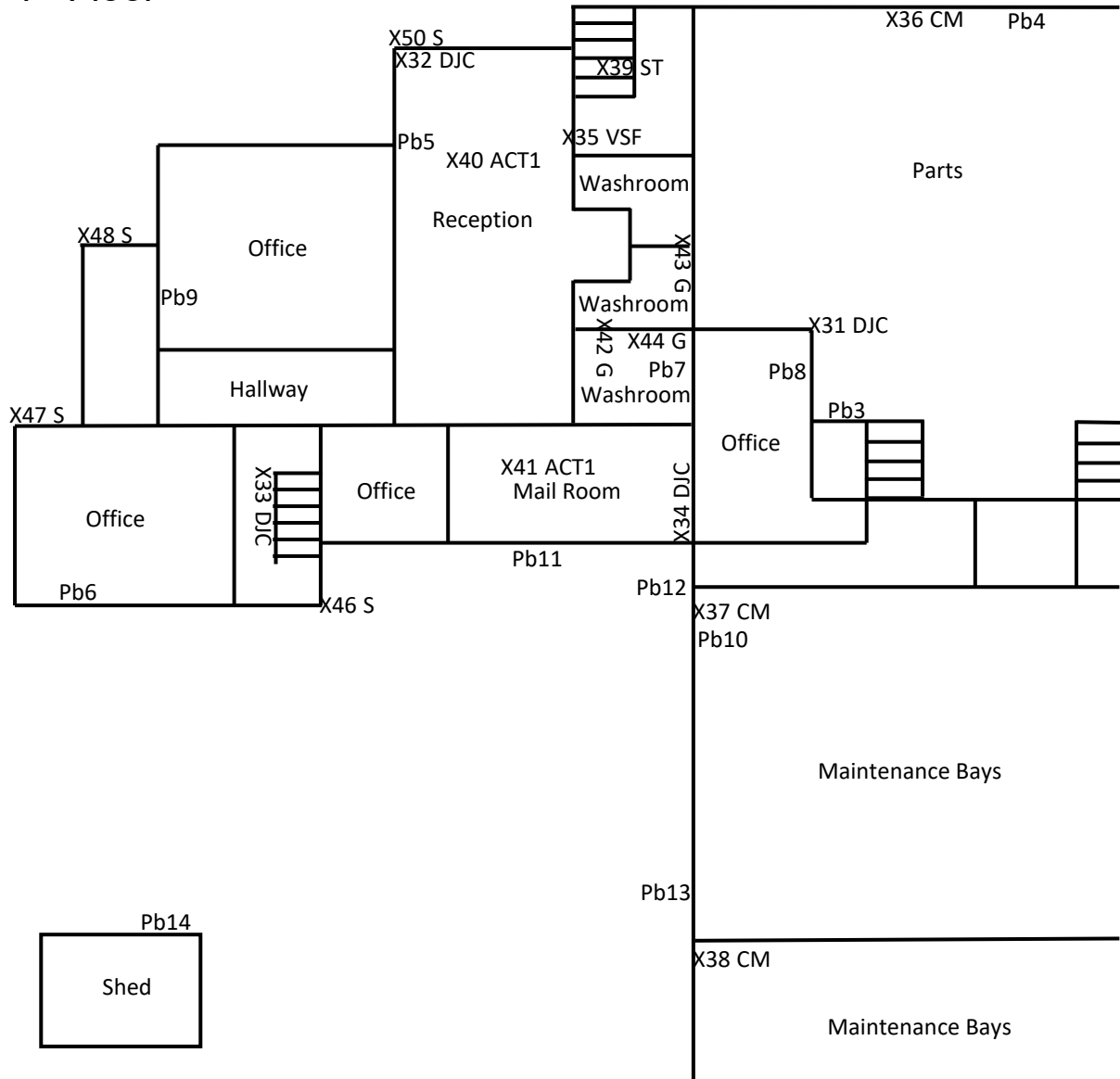


MVIC-2025-07-010

Appendix 3

Sample Locations

1st Floor



LEGEND:

x# Asbestos containing sample location
 x# Non-asbestos containing sample location
 Pb# Lead containing paint sample location
 Pb# Non-lead containing paint sample location

DJC Drywall Joint Compound
 ACT1 Acoustic Ceiling Tile 1
 ACT2 Acoustic Ceiling Tile 2
 F Firestop
 G Grout
 CM Concrete Block Mortar
 ST Stair Tread
 S Stucco

Project #: 63920

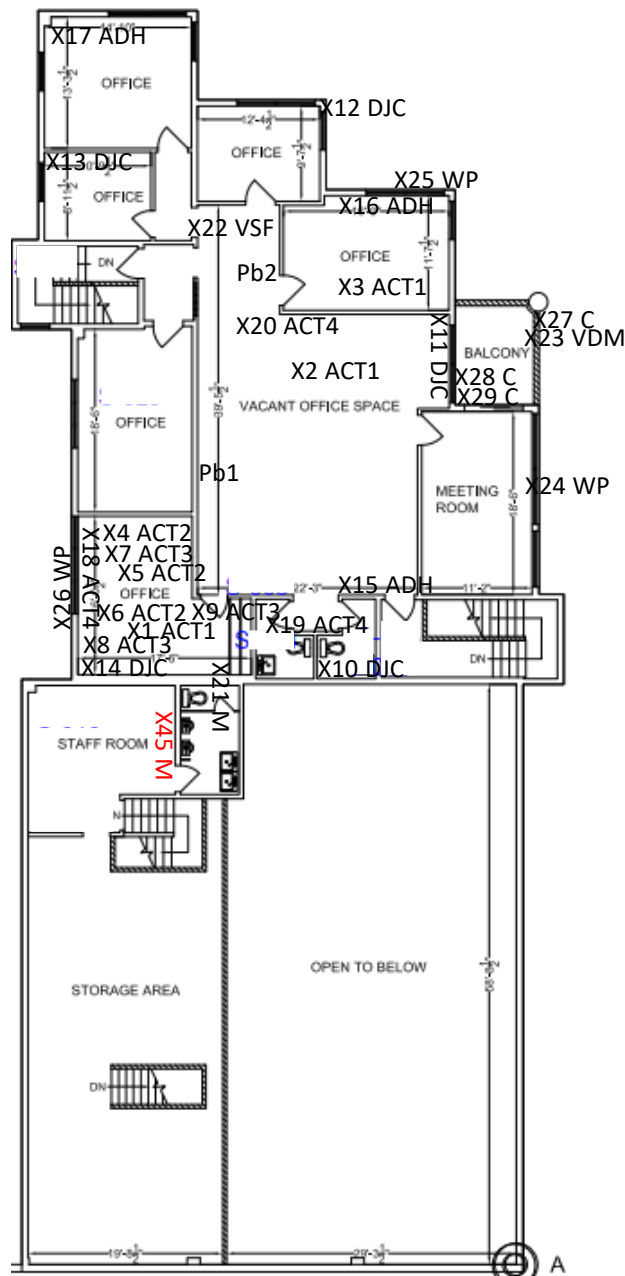
Date of Issue: April 2025

Hazardous Materials Investigation
 Sample Locations
 Site: 4212 Commerce Circle, Victoria, BC

McElhanney
 500-3960 Quadra Street,
 Victoria, BC V8X 4A3

Not to Scale

2nd Floor



LEGEND:

- x#** Asbestos containing sample location
- x#** Non-asbestos containing sample location
- Pb#** Lead containing paint sample location
- Pb#** Non-lead containing paint sample location

- DJC** Drywall Joint Compound
- VSF** Vinyl Sheet Floor
- ACT1** Acoustic Ceiling Tile 1
- ACT2** Acoustic Ceiling Tile 2
- ACT3** Acoustic Ceiling Tile 3
- ACT4** Acoustic Ceiling Tile 4
- WP** Window Putty
- VDM** Vinyl Deck Membrane
- M** Mastic
- DM** Duct Mastic
- C** Caulking

Project #: 63920

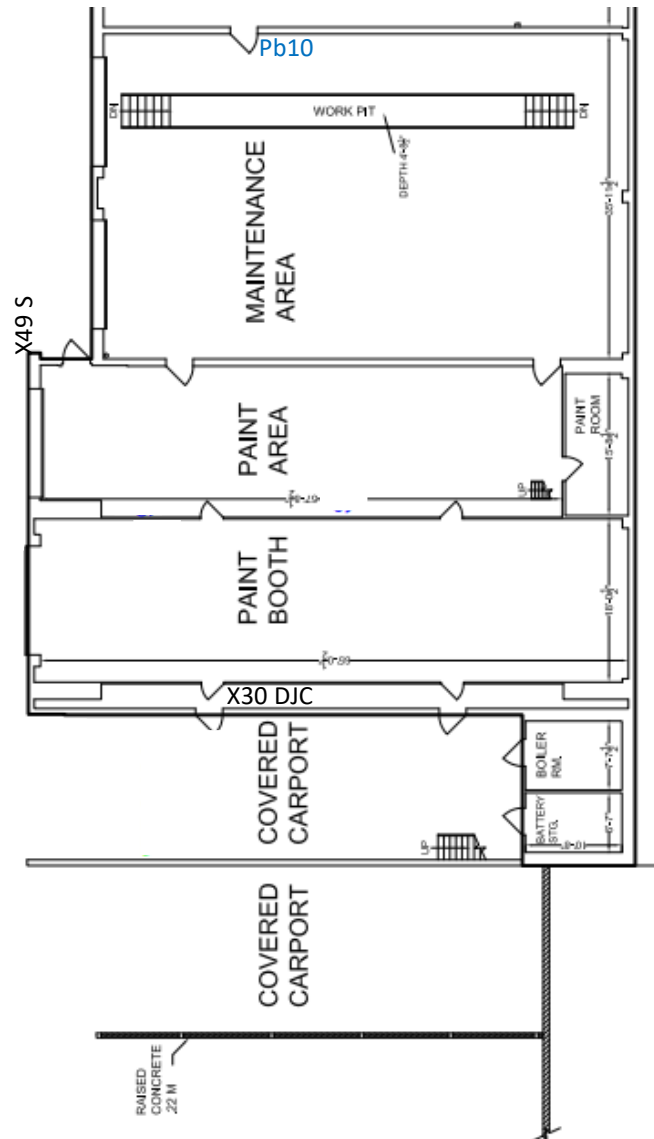
Date of Issue: April 2025

Hazardous Materials Investigation
Sample Locations
Site: 4212 Commerce Circle, Victoria, BC

McElhanney
500-3960 Quadra Street,
Victoria, BC V8X 4A3

Not to Scale

1st Floor



Not to Scale

LEGEND:

x# Asbestos containing sample location
x# Non-asbestos containing sample location
Pb# Lead containing paint sample location
Pb# Non-lead containing paint sample location

DJC Drywall Joint Compound
VFT Vinyl Floor Tile
ACT1 Acoustic Ceiling Tile 1
ACT2 Acoustic Ceiling Tile 2
F Firestop
G Grout
M Concrete Block Mortar
DM Duct Mastic
C Caulking

Project #: 63920

Date of Issue: April 2025

Hazardous Materials Investigation
 Sample Locations
 Site: 4212 Commerce Circle, Victoria, BC

McElhanney
 500-3960 Quadra Street,
 Victoria, BC V8X 4A3

Roof



Not to Scale

LEGEND:

x# Asbestos containing sample location
x# Non-asbestos containing sample location
Pb# Lead containing paint sample location
Pb# Non-lead containing paint sample location

TA Torch on Asphalt
TG Tar and Gravel
CW Caulking White
MB Mastic Black
MG Mastic Grey
T Tar

Project #: 63920

Date of Issue: June 2025

Hazardous Materials Investigation
Sample Locations
Site: 4212 Commerce Circle, Victoria, BC

McElhanney
500-3960 Quadra Street,
Victoria, BC V8X 4A3