



May 26, 2011

Mr. John Pekala
ENVIRON International Corporation
560 West Lake Mead Parkway
Henderson, Nevada 89015

**Regarding: *Limited Asbestos Survey – RZ-C-19*
Nevada Environmental Response Trust
560 West Lake Mead Parkway
Henderson, Nevada 89015
Project – CON111106**

Dear Mr. Pekala,

Logistical Solutions, LLC. (LoSo) is pleased to provide ENVIRON International Corporation the results of the *Limited Asbestos Survey* conducted for the Nevada Environmental Response Trust site located at 560 West Lake Mead Parkway in Henderson, Nevada. The purpose of the limited asbestos survey (LAS) was to identify, within reason, the presence and location of potential asbestos-containing materials (ACMs) within and adjacent to Remediation Zone RZ-C-19 (project area).

The scope-of-work performed as part of this LAS included a visual survey of the project area, bulk-material sample collection of suspect ACMs, laboratory analysis, and preparation of this report.

ASBESTOS REGULATIONS

EPA – National Emission Standard for Hazardous Air Pollutants (NESHAP)-Asbestos

The *United States Environmental Protection Agency* (EPA) regulates the emission of asbestos in Title 40 of the *Code of Federal Regulations* (CFR), Chapter I, Subchapter C, Part 61, Subpart M, *National Emissions Standards for Hazardous Air Pollutants* (NESHAP). The NESHAP provides regulatory standards for the control of asbestos emissions during the removal and/or abatement of regulated asbestos containing material (RACM).

RACM is defined by NESHAP as meeting any of the following definitions: 1) a friable asbestos material; 2) a Category I non-friable ACBM that has become friable; 3) a Category I non-friable asbestos containing building materials (ACBM) that will be or has been subject to sanding, grinding, cutting, or abrading, or 4) a Category II non-friable ACBM that has a high probability of becoming or has become crumbled, pulverized or reduced to powder by the forces expected to act on the material in the course of demolition or renovation operations.

The NESHAP provides the following definitions for friable, non-friable, Category I non-friable, and Category II non-friable asbestos material:

- ◆ **Friable asbestos material** means any material containing more than one percent asbestos.... that, when dry, can be crumbled, pulverized, or reduced to powder by hand pressure.

- ◆ **Non-friable asbestos material** means any material containing more than one percent asbestos.... that, when dry, cannot be crumbled, pulverized, or reduced to powder by hand pressure.
- ◆ **Category I non-friable asbestos-containing material (ACM)** means asbestos-containing packings, gaskets, resilient floor covering, and asphalt roofing products containing more than one percent asbestos.
- ◆ **Category II non-friable ACM** means any material, excluding Category I non-friable ACM, containing more than one percent asbestos...that, when dry, cannot be crumbled, pulverized, or reduced to powder by hand pressure.

According to the NESHAP, RACM must be removed prior to a demolition or renovation of a building. The NESHAP also requires State and local notifications, proper handling, and proper disposal of RACM that may be removed or disturbed during any demolition, repair, or maintenance activities involving the RACM.

OSHA - General Construction Standard

The *Occupational Safety and Health Administration (OSHA)* regulates exposure to airborne asbestos for construction workers in Title 29 CFR, Part 1926.1101, *General Construction Standard (GCS)*. The GCS regulates exposure in all work as defined in 29 CFR 1910.12(b), including, but not limited to the following:

- ◆ Demolition or salvage of structures where asbestos is present;
- ◆ Removal or encapsulation of materials containing asbestos;
- ◆ Construction, alteration, repair, maintenance, or renovation of structures, substrates, or portions thereof, that contain asbestos;
- ◆ Installation of products containing asbestos;
- ◆ Asbestos spill/emergency cleanup;
- ◆ Transportation, disposal, storage, containment of and housekeeping activities involving asbestos or products containing asbestos, on the site or location at which construction activities are performed;
- ◆ Coverage under this standard shall be based on the nature of the work operation involving asbestos exposure; and
- ◆ This section does not apply to asbestos-containing asphalt roof coatings, cements, and mastics.

The GCS, which requires proper training of workers prior to the commencement of work, classifies asbestos-related work under this section into four classes:

- ◆ **Class I** – activities involving the removal of thermal system insulation (TSI) and surfacing asbestos-containing material (ACM) and potential asbestos-containing material (PACM);
- ◆ **Class II** – activities involving the removal of ACM which is not thermal system insulation or surfacing material. This includes, but is not limited to, the removal of asbestos-containing wallboard, floor tile and sheeting, roofing and siding shingles, and construction mastics;
- ◆ **Class III** – repair and maintenance operations, where “ACM” including TSI ACM, surfacing ACM, and PACM may be disturbed; and
- ◆ **Class IV** – maintenance and custodial activities during which employees contact, but do not disturb, ACM or PACM and activities to clean up dust, waste, and debris resulting from Class I, Class II, and Class III activities.

LIMITED ASBESTOS SURVEY

Material Survey

On May 12, 2011, a Nevada-licensed asbestos building inspector visually surveyed the proposed excavation area within and adjacent to RZ-C-19 for the presence of potential ACMs. An 18-inch-diameter transite pipe was identified within the work area as PACM. As a result, one bulk sample was collected for analyses. A photograph of the bulk sample location is included within the attached photograph log.

The suspect ACM sample was placed in plastic Zip-Loc™ bag. The bag was sealed, labeled, and transported to Forensic Analytical Laboratories, Inc., a National Voluntary Laboratory Accreditation Program (NVLAP) laboratory. The bulk sample was analyzed for asbestos using the method specified in Appendix E, Subpart E, 40 Code of Federal Regulations, Part 763, Section 1, Polarized Light Microscopy (PLM).

Results, Discussion, and Recommendations

Bulk sample T-25 reported an ACM concentration of 22 percent. A copy of the analytical report and chain-of-custody documentation indicating the sample location and material description are attached.

One homogeneous area of approximately 130 feet of 18-inch-diameter transite pipe was identified as ACM. According to OSHA 29 CFR 1926.1101(b), transite removal is considered Class II asbestos work defined as the removal of ACM which is not TSI or surfacing material.

The transite pipe was not a friable material in its intended use; however, excavation or disturbance of the pipe may render the material friable. As a result, a Nevada-licensed asbestos abatement contractor must be used to remove and dispose of the ACM prior to disturbance of the materials. Asbestos work activities are categorized according to OSHA 29 CFR 1926.1101(b). Class I asbestos work is defined as activities involving the removal of TSI ACM, surfacing ACM, and PACM. Class II asbestos work means activities involving the removal of ACM which is not thermal system insulation or surfacing material. This includes, but is not limited to, the removal of asbestos-containing wallboard, floor tile and sheeting, roofing and siding shingles, and construction mastics. Class III asbestos work involves repair and maintenance operations, where ACM, including TSI and surfacing ACM and PACM, is likely to be disturbed, and Class IV asbestos work means maintenance and custodial activities during which employees contact but do not disturb ACM or PACM and activities to clean up dust, waste, and debris resulting from Class I, Class II, and Class III activities.

Federal law requires that asbestos control professionals must be trained on how to properly inspect for the presence of asbestos and to repair and remove it. Training for asbestos abatement professionals is required under AHERA, which is the authority under which EPA issued the EPA Asbestos Model Accreditation Plan (MAP) (40 CFR Part 763, Appendix C to Subpart E). Individuals seeking accreditation as asbestos abatement workers shall complete at least a 4-day training course as outlined in 40 CFR Part 763, Appendix C to Subpart E. The 4-day worker training course shall include lectures, demonstrations, and at least 14 hours of hands-on training.

After ACM removal is considered complete, a post-abatement visual assessment conducted by a Nevada-licensed asbestos project monitor is required to establish that removal has been achieved.

Limitations

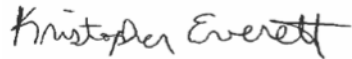
This report has been prepared for the exclusive use of ENVIRON International Corporation. The findings presented herein are based upon observations of our field personnel, points of investigation, and results of laboratory tests performed by Forensic Analytical Laboratories, Inc. All accessible areas of the excavation zone as part of this survey were attempted to be visually surveyed for the presence of potential asbestos-containing materials. However, it is possible that not all potential ACMs located within the excavation zone were identified in this survey.

Our services were performed in accordance with the generally accepted standard of practice at the time this report was written. No warranty, expressed or implied, is intended.

LoSo appreciates being of service to ENVIRON International Corporation on this project. If you have any questions or require additional information, please contact us at (702) 596-2021.

Sincerely,

Logistical Solutions, LLC



Kristopher Everett, CEM
Project Manager
NV Asbestos Consultant No. IM-1569



Ty L. Salazar, CEM, OHST
Operations Manager
NV Asbestos Consultant No. IM-1413

Attachments: Photograph Log
 Aerial Photo with Sampling Location
 Analytical Report and Chain-of-Custody Documentation

**Photograph Log
Bulk Sample Locations**



Sample ID	Color	Description	Location	Percent Asbestos	Friable or Non-Friable	Estimated Quantities	Condition
NA	NA	Soil Above Transite Pipe Run	Within and adjacent to RZ-C-19	NA	NA	NA	NA

**Photograph Log
Bulk Sample Locations**



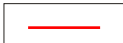
Sample ID	Color	Description	Location	Percent Asbestos	Friable or Non-Friable	Estimated Quantities	Condition
T-25	Brown	Transite Pipe	Within and adjacent to RZ-C-19	22%	Non-Friable	130 linear feet	Fair



LEGEND

N

Transite Piping



Approximate Scale: 1 inch ~ 75 feet



SITE PLAN

Nevada Environmental Response Trust

RZ-C-19

Project Number
CON1111-06





Bulk Asbestos Analysis

(EPA Method 600/R-93-116, Visual Area Estimation)

Logistical Solutions, LLC
Ty Salazar
4780 W. Ann Road
Suite 5-237
N. Las Vegas, NV 89031

Client ID: L1349
Report Number: B149260
Date Received: 05/12/11
Date Analyzed: 05/17/11
Date Printed: 05/17/11
First Reported: 05/17/11

Job ID/Site: CON111106; Former Tronox, 560 W. Lake Mead Pkwy. Henderson NV

FALI Job ID: L1349

Date(s) Collected: 05/12/2011

Total Samples Submitted: 1

Total Samples Analyzed: 1

Sample ID	Lab Number	Asbestos Type	Percent in Layer	Asbestos Type	Percent in Layer	Asbestos Type	Percent in Layer
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T-25	01031000						
Layer: Grey Cementitious Material		Chrysotile	15 %	Crocidolite	7 %		

Total Composite Values of Fibrous Components: **Asbestos (22%)**

Tracy Mitchell, Laboratory Analyst, Las Vegas Laboratory

Note: Limit of Quantification ('LOQ') = 1%. 'Trace' denotes the presence of asbestos below the LOQ. 'ND' = 'None Detected'.

Analytical results and reports are generated by Forensic Analytical Laboratories Inc. (FALI) at the request of and for the exclusive use of the person or entity (client) named on such report. Results, reports or copies of same will not be released by FALI to any third party without prior written request from client. This report applies only to the sample(s) tested. Supporting laboratory documentation is available upon request. This report must not be reproduced except in full, unless approved by FALI. The client is solely responsible for the use and interpretation of test results and reports requested from FALI. Forensic Analytical Laboratories Inc. is not able to assess the degree of hazard resulting from materials analyzed. FALI reserves the right to dispose of all samples after a period of thirty (30) days, according to all state and federal guidelines, unless otherwise specified. All samples were received in acceptable condition unless otherwise noted.



Client Name & Address: **Logistical solutions LLC**
 4780 W. Ann Rd., Ste - 5-237
 N. Las Vegas NV, 89021

PO / Job#: **CON111106** Date: **5-12-11**

Turn Around Time: Same Day / 1Day / 2Day / 3Day / 4Day / 5Day

PCM: NIOSH 7400A / NIOSH 7400B Rotometer

PLM: Standard / Point Count **400** / 1000 / CARB 435

Contact: **Ty Salazar**

Phone: **702-596-2021** Fax: **974-1776**

E-mail: **tsalazar@losanov.com, htavarez@losanov.com**

Site: **NERT - Bulk asbestos analysis**

Site Location: **Former Tronox, 5600 W. Lake Mead Pkwy, Henderson NV**

Comments: _____

Report Via: Fax E-Mail Verbal

5-Day
RUSH

Sample ID	Date / Time	Sample Location / Description	FOR AIR SAMPLES ONLY				Sample Area / Air Volume
			Type	Time On/Off	Avg. LPM	Total Time	
T-25	5-12-11 1130	R2-C, Transite Pipe Grey material	A P C				
T-26	5-12-11 1135	R2-C, 9" Black/Brown Pipe, with Pipe Wrap	A P C				
T-27	5-12-11 1140	R2-C, 2" Brown Pipe w/ Pipe Wrap	A P C				
T-28	5-12-11 1145	R2-C, 2" Black Pipe, wrapped with multi layers.	A P C				
T-29	5-12-11 1150	R2-C, 4" Brown/Green Pipe, with pipe wrap.	A P C				
			A P C				
			A P C				
			A P C				
			A P C				

Sampled By: **Ty Salazar** Date: **5/12/11** Time: **1250**

Shipped Via: Fed Ex DHL UPS US Mail Courier Drop Off Other:

Relinquished By: _____ Date / Time: **5/12/11 1252**

Received By: **[Signature]** Date / Time: **5/12/11 1252**

Condition Acceptable? Yes No