



July 22, 2011

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

**Regarding: *Limited Asbestos Survey RZ-C-29 & 39*
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 Remediation Zones RZ-C-29 and RZ-C-39 (project areas).

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 ACM 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 ACM 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 July 12, 2011, a Nevada-licensed asbestos building inspector visually surveyed the proposed demolition and excavation areas within RZ-C-29 and RZ-C-39 for the presence of potential ACMs.

Photographs of the bulk sampling locations are included within the attached photograph log. Additional samples were collected on July 18, 2011 to help confirm the analytical results. The potential ACMs identified within the project at the time of the survey were as follows:

- ◆ Two-inch metal piping with TSI;
- ◆ Four-inch metal piping with TSI;
- ◆ Four-inch gasket material; and
- ◆ Painted surfacing material.

A total of 11 bulk material samples were collected. The suspect ACM samples were placed in plastic Zip-Loc™ bags. The bags were sealed, labeled, and transported to Forensic Analytical Laboratories, Inc., a National Voluntary Laboratory Accreditation Program (NVLAP) laboratory. The bulks samples were 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

Asbestos was not detected (ND) in all (11) bulk samples collected. Sample identification includes TF-001, TF-002, TF-003, LA-001, LA-003, TA-004, TA-005, TA-006, TA-007, TA-008, and TA-009. Please exercise caution when working near other suspect ACMs. An asbestos survey should be conducted by a Nevada-licensed asbestos building inspector in general accordance with the sample collection protocols established in EPA Regulation 40 CFR 763, Asbestos Hazard Emergency Response Act (AHERA) if it is possible to disturb any adjoining suspect ACM. A copy of the analytical report and chain-of-custody documentation are attached.

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



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

Attachments: Photograph Log
Aerial Photo with Sampling Locations
Analytical Reports and Chain-of-Custody Documentation



1. View is northwest in RZ-C-29. Pipe rack with multiple pipes, valves and fittings.

2. View of 4" diameter steel piping with gasket.



3. View of 4" diameter steel piping with TSI.

SITE PHOTOGRAPHS

Nevada Environmental Response Trust
Remediation Zone RZ-C-29 & 39

Project No:
CON111106






4. View of 2" diameter steel piping with TSI.

5. View of all piping with gaskets and TSI.



6. View is northeast in RZ-C-39. Concrete loading ramp with black coating and paint.

SITE PHOTOGRAPHS	
Nevada Environmental Response Trust Remediation Zone RZ-C-29 & 39	
Project No: CON11106	



7. View of concrete loading ramp with black coating and paint.

8. View of concrete loading ramp with black coating and paint.



9. View of concrete loading ramp with black coating and paint.

SITE PHOTOGRAPHS

Nevada Environmental Response Trust
Remediation Zone RZ-C-29 & 39

Project No:
CON111106

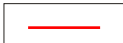




LEGEND

N

Soil and Debris PACM



Approximate Scale: 1 inch ~ 130 feet



SITE PLAN

Nevada Environmental Response Trust
RZ-C-29 & 39

Project Number
CON111106





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: B151650
Date Received: 07/12/11
Date Analyzed: 07/13/11
Date Printed: 07/13/11
First Reported: 07/13/11

Job ID/Site: CON111106; NERT - Beta Ditch/Loading Ramp (R2-C); NERT Site, Henderson, NV
Date(s) Collected: 07/12/2011

FALI Job ID: L1349
Total Samples Submitted: 10
Total Samples Analyzed: 10

Sample ID	Lab Number	Asbestos Type	Percent in Layer	Asbestos Type	Percent in Layer	Asbestos Type	Percent in Layer
BD-001	01033500						
Layer: Brown Soil		Chrysotile	Trace				
Total Composite Values of Fibrous Components:		Asbestos (Trace)					
Cellulose (2 %)							
BD-002	01033501						
Layer: Off-White Non-Fibrous Material			ND				
Total Composite Values of Fibrous Components:		Asbestos (ND)					
Cellulose (Trace)							
BD-003	01033502						
Layer: Beige Fibrous Material		Chrysotile	99 %				
Total Composite Values of Fibrous Components:		Asbestos (99%)					
BD-004	01033503						
Layer: Brown Soil			ND				
Layer: Beige Fibrous Debris		Chrysotile	99 %				
Total Composite Values of Fibrous Components:		Asbestos (10%)					
BD-005	01033504						
Layer: Beige Soil			ND				
Layer: Beige Fibrous Material		Chrysotile	99 %				
Total Composite Values of Fibrous Components:		Asbestos (69%)					
Cellulose (Trace)							
TF-001	01033505						
Layer: Grey Non-Fibrous Material			ND				
Total Composite Values of Fibrous Components:		Asbestos (ND)					
Cellulose (Trace)							
TF-002	01033506						
Layer: Beige Semi-Fibrous Material			ND				
Total Composite Values of Fibrous Components:		Asbestos (ND)					
Cellulose (15 %) Synthetic (5 %)							

Client Name: Logistical Solutions, LLC

Report Number: B151650

Date Printed: 07/13/11

Sample ID	Lab Number	Asbestos Type	Percent in Layer	Asbestos Type	Percent in Layer	Asbestos Type	Percent in Layer
TF-003	01033507						
Layer: Beige Semi-Fibrous Material			ND				
Total Composite Values of Fibrous Components:		Asbestos (ND)					
Cellulose (15 %) Synthetic (5 %)							
LA-001	01033508						
Layer: Black Non-Fibrous Material			ND				
Layer: Grey Non-Fibrous Material			ND				
Layer: Off-White Paint			ND				
Total Composite Values of Fibrous Components:		Asbestos (ND)					
Cellulose (Trace)							
LA-003	01033509						
Layer: Black Non-Fibrous Material			ND				
Layer: Grey Paint			ND				
Layer: Off-White Fibrous Material			ND				
Total Composite Values of Fibrous Components:		Asbestos (ND)					
Cellulose (Trace) Fibrous Glass (2 %)							



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'.

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Email

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Forensic Analytical Laboratories, Inc.

Analysis Request Form (COC)

Client Name & Address: Client No.: L1349 Logistical Solutions, LLC 4780 W. Ann Road, #5-237 N. Las Vegas, NV 89031		PO/Job#: COU11106	Date: 7-12-11
Contact: Ty Salazar		Turn Around Time: Same Day / 1Day / 2Day / 3Day / 4Day / 5Day	
Phone: 7023762344 Fax: 7029741776		<input type="checkbox"/> PCM: <input type="checkbox"/> NIOSH 7400A / <input type="checkbox"/> NIOSH 7400B <input type="checkbox"/> Rotometer <input checked="" type="checkbox"/> PLM: <input type="checkbox"/> Standard / <input type="checkbox"/> Point Count: 400 - 1000 / <input type="checkbox"/> CARB 435	
E-mail: tsalazar@losonow.com		<input type="checkbox"/> TLM Air: <input type="checkbox"/> AI/ERA / <input type="checkbox"/> Yamate2 / <input type="checkbox"/> NIOSH 7402 <input type="checkbox"/> TLM Bulk: <input type="checkbox"/> Quantitative / <input type="checkbox"/> Qualitative / <input type="checkbox"/> Chatfield <input type="checkbox"/> TLM Water: <input type="checkbox"/> Potable / <input type="checkbox"/> Non-Potable / <input type="checkbox"/> Weight % <input type="checkbox"/> TLM Microvac: <input type="checkbox"/> Quali(+/-) / <input type="checkbox"/> D3755(str/area) / <input type="checkbox"/> D3756(str/mass)	
Site: NERT - Beta Ditch / Loading Ramp		<input type="checkbox"/> IAQ Particle Identification (PLM LAB) <input type="checkbox"/> PLM Opaques/Soot <input type="checkbox"/> Particle Identification (TEM LAB) <input type="checkbox"/> Special Project <input type="checkbox"/> Metals Analysis: Method:	
Site Location: NERT SITE, HENDERSON, NV.		Matrix:	
Comments:		Analytes:	

Report Via: Fax E-Mail Verbal

Sample ID	Date / Time	Sample Location / Description	FOR AIR SAMPLES ONLY				Sample Area / Air Volume
			Type	Time On/Off	Avg. LPM	Total Time	
BD-001	7/12/11 0945	RZ-E, Alloy TIMET Fence Line Soil	A P C				
BD-002	7/12/11 0950	" " " " " "	A P C				
BD-003	7/12/11 0953	" " " " " "	A P C				
BD-004	7/12/11 0955	" " " " " "	A P C				
BD-005	7/12/11 0958	" " " " " "	A P C				
TF-001	7/12/11 1015	TANK Fan, Gasket	A P C				
TF-002	7/12/11 1018	" " " " 6" TSI	A P C				
TF-003	7/12/11 1025	" " " " 4" TSI	A P C				
LA-001	7/12/11 1040	LOADING DOCK, PAINT BULK/GRAY	A P C				
LA-002	7/12/11 1048	" " " " " "	A P C				
LA-003	7/12/11 1050	" " " " " "	A P C				

Sampled By: **Ty L. Salazar** Date: **7-12-11** Time:

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

Relinquished By: **Ty L. Salazar** Relinquished By: Date / Time: **7-12-11 1130**

Received By: **[Signature]** Received By: Date / Time: **7/12/11 11:30 am**

Condition Acceptable? Yes No Condition Acceptable? Yes No Condition Acceptable? Yes No



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: B151892
Date Received: 07/18/11
Date Analyzed: 07/19/11
Date Printed: 07/19/11
First Reported: 07/19/11

Job ID/Site: CON111106; NERT Site; Henderson, N.V.

FALI Job ID: L1349

Date(s) Collected: 07/18/2011

Total Samples Submitted: 6
Total Samples Analyzed: 6

Sample ID	Lab Number	Asbestos Type	Percent in Layer	Asbestos Type	Percent in Layer	Asbestos Type	Percent in Layer
TA-004	01033686						
Layer: Off-White Non-Fibrous Material			ND				
Total Composite Values of Fibrous Components:		Asbestos (ND)					
Cellulose (Trace)							
TA-005	01033687						
Layer: Off-White Non-Fibrous Material			ND				
Total Composite Values of Fibrous Components:		Asbestos (ND)					
Cellulose (Trace)							
TA-006	01033688						
Layer: Off-White Semi-Fibrous Material			ND				
Total Composite Values of Fibrous Components:		Asbestos (ND)					
Cellulose (20 %)							
TA-007	01033689						
Layer: Off-White Semi-Fibrous Material			ND				
Total Composite Values of Fibrous Components:		Asbestos (ND)					
Cellulose (20 %)							
TA-008	01033690						
Layer: Off-White Semi-Fibrous Material			ND				
Total Composite Values of Fibrous Components:		Asbestos (ND)					
Cellulose (20 %)							
TA-009	01033691						
Layer: Off-White Semi-Fibrous Material			ND				
Total Composite Values of Fibrous Components:		Asbestos (ND)					
Cellulose (20 %)							

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'.

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Client Name: Logistical Solutions, LLC

Report Number: B151892

Date Printed: 07/19/11

Sample ID	Lab Number	Asbestos Type	Percent in Layer	Asbestos Type	Percent in Layer	Asbestos Type	Percent in Layer
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Email

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Forensic Analytical Laboratories, Inc.

Analysis Request Form (COC)

Client Name & Address: Client No.: L1349 Logistical Solutions, LLC 4780 W. Ann Road, #5-237 N. Las Vegas, NV 89031		PO/Job#: <u>CON11106</u>	Date: <u>7-18-11</u>
Contact: Ty Salazar		Turn Around Time: Same Day / 1Day / <u>2Day</u> / 3Day / 4Day / 5Day	
Phone: <u>7023762344</u> Fax: <u>7029741776</u>		<input type="checkbox"/> PCM: <input type="checkbox"/> NIOSH 7400A / <input type="checkbox"/> NIOSH 7400B <input type="checkbox"/> Rotometer	
E-mail: <u>tsalazar@losonow.com</u>		<input checked="" type="checkbox"/> PLM: <input type="checkbox"/> Standard / <input type="checkbox"/> Point Count: 400 - 1000 / <input type="checkbox"/> CARB 435	
Site: <u>VERT SITE</u>		<input type="checkbox"/> LM Air: <input type="checkbox"/> AHERA / <input type="checkbox"/> Yamate2 / <input type="checkbox"/> NIOSH 7402	
Site Location: <u>Henderson, NV.</u>		<input type="checkbox"/> LM Bulk: <input type="checkbox"/> Quantitative / <input type="checkbox"/> Qualitative / <input type="checkbox"/> Chatfield	
Comments:		<input type="checkbox"/> LM Water: <input type="checkbox"/> Potable / <input type="checkbox"/> Non-Potable / <input type="checkbox"/> Weight %	
		<input type="checkbox"/> LM Microvac: <input type="checkbox"/> Qual(+/-) / <input type="checkbox"/> D5755(str/area) / <input type="checkbox"/> D5756(str/mass)	
		<input type="checkbox"/> IAQ Particle Identification (PLM LAB) <input type="checkbox"/> PLM Opaques/Soot	
		<input type="checkbox"/> Particle Identification (TEM LAB) <input type="checkbox"/> Special Project	
		<input type="checkbox"/> Metals Analysis: Method:	
		Matrix:	
		Analytes:	

Report Via: Fax E-Mail Verbal

Sample ID	Date / Time	Sample Location / Description	FOR AIR SAMPLES ONLY				Sample Area / Air Volume
			Type	Time On/Off	Avg. LPM	Total Time	
TA-004	7-18-11 1200	TANK Area / Blk. Gasket	A P C				
TA-005	7-18-11 1202	TANK Area / Blk. Gasket	A P C				
TA-006	7-18-11 1204	TANK Area / 2" pipe, Beige TSI	A P C				
TA-007	7-18-11 1206	TANK Area / 2" pipe, Beige TSI	A P C				
TA-008	7-18-11 1208	TANK Area / 4" pipe, Beige TSI	A P C				
TA-009	7-18-11 1210	TANK Area / 4" pipe, Beige TSI	A P C				
			A P C				
			A P C				
			A P C				
			A P C				

Sampled By: <u>Ty Salazar</u>	Date: <u>7-18-11</u>	Time: <u>1302</u>
Shipped Via: <input type="checkbox"/> Fed Ex <input type="checkbox"/> DHL <input type="checkbox"/> UPS <input type="checkbox"/> US Mail <input type="checkbox"/> Courier <input checked="" type="checkbox"/> Drop Off <input type="checkbox"/> Other:		
Relinquished By: <u>Ty Salazar</u>	Relinquished By:	Relinquished By:
Date / Time: <u>7-18-11 1302</u>	Date / Time:	Date / Time:
Received By: <u>A. Henry</u>	Received By:	Received By:
Date / Time: <u>7/18/11 1302</u>	Date / Time:	Date / Time:
Condition Acceptable? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Condition Acceptable? <input type="checkbox"/> Yes <input type="checkbox"/> No	Condition Acceptable? <input type="checkbox"/> Yes <input type="checkbox"/> No