



July 14, 2011

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

Regarding: *Limited Asbestos Survey-RZ-E-16B*
 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 Zone RZ-E-16B (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 July 12, 2011, a Nevada-licensed asbestos building inspector visually surveyed the proposed excavation area within RZ-E-16B for the presence of potential ACMs. A photograph of each bulk sample

location is included within the attached photograph log. The potential ACMs identified within the project at the time of the survey were as follows:

- ◆ Soil; and
- ◆ Potential ACM.

A total of 5 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

Bulk samples BD-3, BD-4, and BD-5 reported ACM concentrations of 99 percent, 10 percent, and 69 percent, respectively. Asbestos was not detected (ND) in the remaining bulk samples or was only reported in a trace percentage (B-1). A copy of the analytical reports and chain-of-custody documentation indicating the sample locations and material descriptions are attached.

The homogenous beige fibrous TSI was identified as ACM. According to OSHA 29 CFR 1926.1101(b), TSI is defined as ACM applied to pipes, fittings, boilers, breeching, tanks, ducts or other structural components to prevent heat loss or gain. TSI is a friable material and is classified as RACM, as described in NESHAP 40 CFR 61, Subpart M. The following RACMs were identified:

- ◆ Beige fibrous material in soil.

A Nevada-licensed asbestos abatement contractor must be used to remove and dispose of RACM 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



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

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**Photograph Log
Bulk Sample Locations**



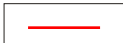
Sample ID	Color	Description	Location	Percent Asbestos	Friable or Non-Friable	Estimated Quantities	Condition
BD-001	Brown	Soil	RZ-E-16B	Trace	Friable	~ 100 sq/ft	Poor
BD-002	Off-White	Debris	RZ-E-16B	ND	Friable	~ 100 sq/ft	Poor
BD-003	Beige	TSI Material	RZ-E-16B	99%	Friable	~ 100 sq/ft	Poor
BD-004	Beige	TSI Material	RZ-E-16B	10%	Friable	~ 100 sq/ft	Poor
BD-005	Beige	TSI Material	RZ-E-16B	69%	Friable	~ 100 sq/ft	Poor



LEGEND

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Soil and Debris PACM



Approximate Scale: 1 inch ~ 75 feet



SITE PLAN

Nevada Environmental Response Trust

RZ-E-16B

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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