August 4, 2011

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

Regarding: ***Limited Asbestos Survey***
Fibrous Material located within RZ-D Debris Piles
Nevada Environmental Response Trust
560 West Lake Mead Parkway
Henderson, Nevada 89015
Project No. CON111106

Dear Mr. Pekala,

Logistical Solutions (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 whether the fibrous material located within the northern portion of the RZ-D debris piles is an asbestos-containing material (ACM). The general location of the RZ-D debris piles and bulk sample location of the fibrous material is depicted on the attached site plan.

The scope-of-work performed as part of this LAS included collecting bulk-material samples of the suspect ACM, 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 28, 2011, a Nevada-licensed asbestos building inspector collected three samples of a fibrous white to grey color material from the northern portion of the RZ-D debris piles. It appeared that the total volume of this material is approximately two to three cubic yards. Photographs of the material sampled are included on the attached photograph log.

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 bulk samples RZ-D-DP-001, RZ-D-DP-002, and RZ-D-DP-003. It should be noted that other suspect ACMs were observed within the RZ-D debris piles. 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

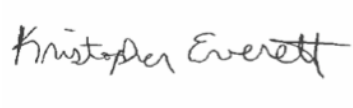
This report has been prepared for the exclusive use of ENVIRON International Corporation. The findings presented herein are based upon observations of our field personnel, points of investigation, and results of laboratory tests performed by Forensic Analytical Laboratories, Inc. All accessible areas 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



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: Site Plan
Photograph Log
Analytical Report and Chain-of-Custody Documentation

LEGEND

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RZ-D Debris Piles

Approximate Scale: 1 inch ~ 64 feet

SITE PLAN

Nevada Environmental Response Trust

Remediation Zone RZ-D

Project Number
CON111106

1. View of a white to grey fibrous material.

2. View of a white to grey fibrous material located at the northern portion of the RZ-D debris piles.

3. View of a white to grey fibrous material.

SITE PHOTOGRAPHS	
Nevada Environmental Response Trust	
Remediation Zone RZ-D	
Project No: CON111106	

Forensic Analytical Laboratories

Final Report

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

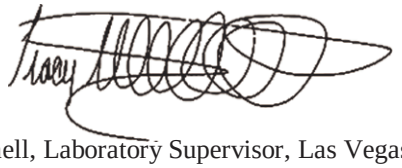
Client ID: L1349
Report Number: B152330
Date Received: 07/28/11
Date Analyzed: 07/28/11
Date Printed: 07/28/11
First Reported: 07/28/11

Job ID/Site: NV Env. Response Site - EZ-D Debris Pile; Tronox - Henderson Facility

Date(s) Collected: 07/28/2011

FALI Job ID: L1349
Total Samples Submitted: 3
Total Samples Analyzed: 3

Sample ID	Lab Number	Asbestos Type	Percent in Layer	Asbestos Type	Percent in Layer	Asbestos Type	Percent in Layer
RZ-D-DP-001	01034140						
Layer: Brown Fibrous Debris			**ND**				
Total Composite Values of Fibrous Components:		**Asbestos (ND)**					
Comment: Wipe/Microvac/Debris sample: Quantitative data may not be repeatable or represent the entire sample.							
RZ-D-DP-002	01034141						
Layer: Brown Fibrous Debris			**ND**				
Total Composite Values of Fibrous Components:		**Asbestos (ND)**					
Cellulose (Trace)							
Comment: Wipe/Microvac/Debris sample: Quantitative data may not be repeatable or represent the entire sample.							
RZ-D-DP-003	01034142						
Layer: Brown Fibrous Debris			**ND**				
Total Composite Values of Fibrous Components:		**Asbestos (ND)**					
Cellulose (Trace)							
Comment: Wipe/Microvac/Debris sample: Quantitative data may not be repeatable or represent the entire sample.							



Tracy Mitchell, Laboratory Supervisor, Las Vegas Laboratory

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

6765 S. Eastern Avenue, Suite 3, Las Vegas, NV 89119 / Telephone: (702) 387-0040 / Fax: (702) 784-0030

Forensic Analytical Laboratories, Inc.

Analysis Request Form (COC)

Client Name & Address: Logistical Solutions, LLC 4780 West Ann Road #5-237 North Las Vegas, NV 89031	PO / Job#: CON111106 Date: 07/28/11 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: Kris Everett	☐ TEM Air: ☐ AHERA / ☐ Yamate2 / ☐ NIOSH 7402 ☐ TEM Bulk: ☐ Quantitative / ☐ Qualitative / ☐ Chatfield ☐ TEM Water: ☐ Potable / ☐ Non-Potable / ☐ Weight % ☐ TEM Microvac: ☐ Qual(+/-) / ☐ D5755(str/area) / ☐ D5756(str/mass)
Phone: (702) 340-2594 Fax: (702) 974-1776	
E-mail: keverett@losonow.com	☐ IAQ Particle Identification (PLM LAB) ☐ PLM Opaques/Soot ☐ Particle Identification (TEM LAB) ☐ Special Project
Site: NV Env. Response Site - RZ-D Debris Pile	☐ Metals Analysis: Method: Matrix: Analytes:
Site Location: Tronox - Henderson Facility	
Comments:	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	
RZ-D-DP-001	07/28 1310	RZ-D Debris Pile / Fibers	A P C				
RZ-D-DP-002	07/28 1312	RZ-D Debris Pile / Fibers	A P C				
RZ-D-DP-003	07/28 1315	RZ-D Debris Pile / Fibers	A P C				
			A P C				
			A P C				
			A P C				
			A P C				
			A P C				
			A P C				
			A P C				

Sampled By: Kristopher Everett Date: 07/28/11 Time: 1425

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

Relinquished By: Kristopher Everett Date / Time: 07/28/11 / 1425	Relinquished By: Date / Time:	Relinquished By: Date / Time:
Received By: Date / Time: 7/28/11 14:30 Condition Acceptable? ☒ Yes ☐ No	Received By: Date / Time: Condition Acceptable? ☐ Yes ☐ No	Received By: Date / Time: Condition Acceptable? ☐ Yes ☐ No

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Los Angeles Office: 2959 Pacific Commerce Drive, Rancho Dominguez, California 90221 / Ph: (310)763-2374 * (888)813-9417 / Fax: (310)763-4450
Las Vegas Office: 6765 S. Eastern Avenue, Suite 3, Las Vegas, Nevada 89119 / Ph: (702)784-0040 / Fax: (702)784-0030