

June 19, 2014

Mr. Weiquan Dong, PE
Bureau of Corrective Actions, Special Projects Branch
Nevada Division of Environmental Protection
2030 E. Flamingo Rd., Suite 230
Las Vegas, Nevada 89119

Re: Response to Issues Identified in: *Data Validation Summary Report for Asbestos Data Associated with the Post-Remediation Screening Health Risk Assessment Report for Parcels C, D, F, G and H, Nevada Environmental Response Trust (NERT)*, by Neptune and Company, Inc. dated February 10, 2014

Dear Mr. Dong:

Neptune and Company, Inc. (Neptune) prepared *Data Validation Summary Report for Asbestos Data Associated with the Post-Remediation Screening Health Risk Assessment Report for Parcels C, D, F, G and H*, Nevada Environmental Response Trust (DVSR), dated February 10, 2014. Section 2.2 (Unaddressed Issues) of the DVSR identified a number of issues associated with the asbestos data. As agreed during a March 28, 2014, call with the Nevada Division of Environmental Protection (NDEP) and Neptune, ENVIRON International Corporation (ENVIRON) and Neptune worked together to resolve the identified issues. Attachment A to this letter includes ENVIRON's annotated responses to the issues identified in the DVSR and Neptune's responses and Attachment B includes supporting materials. The responses reflect the agreements between ENVIRON and Neptune as to the reporting of the data in the Electronic Data Deliverable (EDD) and use of the data for risk assessment.

ENVIRON will include this letter (and Attachments A and B to this letter) in Appendix C (Data Validation Summary Reports [found on CD] and Tables C-1 through C-3) of *Post-Remediation Screening Health Risk Assessment Report for Parcels C, D, F, G and H, Revision 3*, which is being submitted to NDEP on June 19, 2014.

Please contact Allan DeLorme at (510) 420-2565 if you have any comments or questions concerning this report.

Sincerely,



John M. Pekala, CEM #2347
Senior Manager



Allan J. DeLorme, PE
Principal

Attachment A

**Response to Issues Identified in:
*Data Validation Summary Report for
Asbestos Data Associated with the
Post-Remediation Screening Health
Risk Assessment Report for
Parcels C, D, F, G and H***

Attachment A

Response to Issues Identified in: *Data Validation Summary Report for Asbestos Data Associated with the Post-Remediation Screening Health Risk Assessment Report for Parcels C, D, F, G and H, Nevada Environmental Response Trust (NERT), by Neptune and Company, Inc. dated February 10, 2014*

The following issues were identified on page 6 of the Data Validation Summary Report (DVSR).

	DVSR Comment	ENVIRON Response	Neptune and Company Response
Table 4 of the HRA has the following issues:			
1	<p>Sample ID TSB FJ-05 is listed 3 times as a Sample ID in Table 4 and the Sample Name does not match the ID for these 3 instances. According to Table D10, TSB FJ-05 should be removed. It appears that the Sample IDs should be changed to match the Sample Name in the corresponding column (i.e., P4-PF-1-1-0.0-FD, P4-PH-1-1-0.0, TSB-FJ-05-0-FD). Similarly, TSB-FR-02 should be removed from the Sample ID column and be replaced with Q3-PF-3-1-0.0.</p>	<p>Samples TSB FJ-05 and TSB-FR-02 are no longer listed in Table 4; Table 4 is now consistent with Table D-10, which correctly shows that these samples were removed (i.e., the area represented by the samples was scraped).</p> <p>TSB-FJ-05-0-FD has also been removed from Table 4 since it was a field duplicate collected in an area that was removed. In Table D-10, the sample is highlighted to indicate it was excavated and excluded from the HRA calculations. This sample should also be removed from the EDD.</p> <p>The remaining samples noted in this comment (i.e., P4-PF-1-1-0.0-FD, P4-PH-1-1-0.0, and Q3-PF-3-1-0.0) were in SDG 091003269. These samples are discussed in responses to comment # 4 regarding "Laboratory issues" below.</p> <p><i>The corrected versions of Tables 4 and D-10 are included in Attachment B.</i></p>	Acceptable response.
2	<p>The number of long chrysotile fibers for TSB-FJ-10-0 (lab ID 040728237-0032) should be changed from 3 to 2, based on a review of the bench data sheet. The laboratory was counting fibers with widths < 0.5 μm vs. the guidance value of < 0.4 μm. Note that some of these lab reports are rather old and the asbestos guidance has evolved over time. This issue seems to be isolated to SDG 040728237.</p>	<p>The number of long chrysotile fibers for TSB-FJ-10-0 (lab ID 040728237-0032) in Table 4 has been changed from 3 to 2. (Table D-10 also shows the count as 2.)</p>	Acceptable response.

The following issues were identified on the top half of page 7 of the DVSR. For clarity, the five bullets on page 7 of the DVSR have been lettered.

	DVSR Comment	ENVIRON Response	Neptune and Company Response
Table D-10 of the HRA has the following issues:			
a	Most of the sample dates did not match the sample CoC or EMSL records. The sample dates have been corrected to match the CoC or EMSL records; these are denoted in red in the EDD.	<p>During informal discussions following Neptune's preparation of the DVSR, it became apparent that Neptune was reviewing an older (incorrect) version of Table D-10. As a result, some data reported in the copy of Table D-10 reviewed by Neptune were incorrect.</p> <p>The sample dates in Table D-10 are now consistent with the corrections made by Neptune.</p>	Acceptable response.
b	Table D10 was missing the following samples that were found in Table 4: TSB-HJ-09-NE, TSB-GJ-02-0, TSB-GJ-03-0, TSB-GJ-05-0, TSB-GJ-07-0 and TSB-GR-02-0. These samples were added to the EDD (highlighted in yellow) and sample information was transcribed from laboratory reports.	<ul style="list-style-type: none"> • TSB-HJ-09-NE: this sample is part of the Parcel H data set and is now in both Tables 4 and D-10. • TSB-GJ-02-0, TSB-GJ-03-0, TSB-GJ-05-0, TSB-GJ-07-0 and TSB-GR-02-0 are outside the current Parcel G boundary (the boundary of Parcel G was redefined in 2013). These Parcel G samples have been removed from both Tables 4 and D-10 since they are no longer part of the Parcel G risk assessment data set. However, the samples would be included in the EDD. 	Acceptable response.
c	There a numerous samples that have incorrect structure counts; these have been corrected in red in the EDD. Note in some instances this was due to the laboratory using screening dimensions different from the risk guidance, specifically regarding structure width. See Table 4 TSB-FJ-10-0 issues above for details.	<p>The corrections provided by Neptune have been transferred to Table D-10 (and related Table 4, as appropriate), with the following exception:</p> <p style="padding-left: 40px;">TSB-CR-01-0: the count under "Total Asbestos Protocol Structures Count" should be 4 and not 5. (The EDD from Neptune shows a count of 5.)</p>	Acceptable response. This is correct; the total protocol count should be 4 for sample TSB-CR-01-0.
d	The analytical sensitivity for samples P3-PF-1-1-0.0 and P3-PF-2-1-0.0 did not match the laboratory report; these have been corrected in red in the EDD.	Table D-10 was revised to include the corrections made by Neptune to the analytical sensitivities (AS) for samples P3-PF-1-1-0.0 and P3-PF-2-1-0.0. In addition, ENVIRON noted that the AS for Q3-PF-1-1-0.0 was incorrect. The AS for Q3-PF-1-1-0.0 has been changed to 2.99 E+06, as provided in the amended laboratory report dated May 19,	Neptune concurs with these revisions.

	DVSR Comment	ENVIRON Response	Neptune and Company Response
Table D-10 of the HRA has the following issues:			
		2010. (See response to #4 below, regarding the EMSL May 19, 2010 amended final report.)	
e	Although the excavated samples (in orange) were not reviewed for this DVSR due to exclusion from the risk calculations, most of the samples were found to have the incorrect sample date. These samples have been excluded from the EDD deliverable, but it is recommended that the sample information and laboratory reports be reviewed for these samples to verify the correct information is being reported in Table D10.	While ENVIRON concurs that the data for the excavated samples should be compared to the laboratory reports, this was not been done due to the difficulties in reviewing the older (and somewhat illegible) bench data sheets and laboratory reports. Going forward, timely preparation of DVSRs should ensure that all data have been subject to proper review and documentation.	Neptune concurs with this statement.

The following issues were identified on the bottom half of page 7 and continuing on page 8 of the DVSR. For clarity, the nine bullets on pages 7 and 8 of the DVSR have been numbered.

	DVSR Comment	ENVIRON Response	Neptune and Company Response
Laboratory reports or supporting information have the following issues:			
1	Most of the CoC records provided are incomplete with regards to dates and signatures. For example, the CoC associated with SDG 091003471 has only one signature, so it is not clear who relinquished and who received the samples. Similar issues were observed for SDG 040728237.	While the absence of signatures on a chain-of-custody (CoC) is inconsistent with standard sample custody procedures, all other records appear to be in order. The analytical results for these samples are considered usable for risk assessment.	It is agreed that the data is still usable for risk assessment. Any future sampling/analysis should ensure CoCs have proper documentation.
2	The full sample name is not listed on the Bench Sheet Data for samples TSB-CJ-01-0 (lab ID 040728237-0001) and TSB-CJ-02-0 (lab ID 040728237-0002).	Although the sample name is truncated on the Bench Sheet Data (BSD) report, sufficient information is provided such that the samples can be identified with reasonable confidence. The analytical results for these samples are usable for risk assessment.	It is agreed that the data is still usable for risk assessment. Any future analysis of samples should include the full sample ID proper identification.
3	For sample TSB-CJ-07-0 (lab ID 040728237-0007), the Bench Sheet Data (BSD) has discrepancies that need to be clarified; the structure counts cannot be verified. The bottom of pg. 4 of the BSD has a 10 x 0.15 µm structure with "NAM (amphibole)" identification. The NAM mineral class is checked, but it is not clear what the structure really is. If this is a non-regulated amphibole, then the BSD should clarify this. If this structure is a NAM or non-regulated amphibole, the structure counts will be 0 for this sample. Note Table D10 has values above 0 for this sample.	ENVIRON contacted EMSL regarding the interpretation of the BSD report. Robyn Denton of EMSL reviewed the spectra and indicated to ENVIRON via email on May 1, 2014 that the sample is NAM. Table D-10 has been revised to show 0 counts for this sample.	Acceptable response.

	DVSR Comment	ENVIRON Response	Neptune and Company Response
Laboratory reports or supporting information have the following issues:			
4	<p>Samples in SDG 091003269 have two reports (initial and amended). The amended report appears to introduce new issues vs. resolving the original ones for samples. Due to the number of issues found in both reports, it is not clear what to verify data against. The laboratory reports for all of these samples should be verified for correctness with EMSL.</p> <p>Some of the issues found in the file 091003269_SDG_Final_Report_TRNX26.pdf were:</p> <ul style="list-style-type: none"> a) 091003269-0004 and 091003269-0007 have the same sample name (P3-PF-2-1-0.0) and b) the CoC has P4-PF-1-1-0.0 listed twice. <p>Some of the issues found in the file 091003269_SDG_Final_Report_TRNX26_Amended_05 2010.pdf were:</p> <ul style="list-style-type: none"> c) 091003269-0002 (originally P3-PF-1-1-0.0) was changed to Q3-PF-1-1-0.0; 091003269-0003 (originally P4-PH-1-1-0.0) was changed to Q3-PF-1-1-0.0-FD; and d) the sample counts and/or analytical sensitivities were not matching up with Table D10. <p>Due to the numerous issues found in both files, it is not clear what is correct laboratory report for any of the samples in this SDG. These samples and counts could not be verified. It is recommended that EMSL issue a letter indicating the correct lab ID with the correct customer ID, including corrected CoC documentation. Additionally, there should be an explanation as to why the samples are mixed up and changed between reports to understand the reasoning for some of the changes. There is some email correspondence in the amended files, but the attachments are excluded making it difficult to interpret the issues and how they should be resolved.</p>	<p>We concur that SDG 091003269 is difficult to verify; however, our review of the available records indicates that sufficient information is available and that the analytical results are usable for risk assessment.</p> <p>The primary issue with the records appears to be confusion introduced when Cindy Arnold of Northgate Environmental Management notified Daniel Kocher of EMSL via email on April 13, 2010 that the field sample IDs for samples that had already been received by EMSL were to be revised and that two different samples had been given the same name. While this has led to considerable confusion in the reporting of the data, the following can be stated with reasonable certainty:</p> <ul style="list-style-type: none"> • SDG 091003269 contains 9 samples collected in Parcel F, one of which was a field duplicate. • EMSL conducted 9 separate analyses and reported data for each of the 9 samples. • Revised Table D-10 (Attachment B) includes the 9 samples in SDG 091003269, the corrected sample names, and the results reported for the samples. <p>ENVIRON discussed SDG 091003269 with Northgate, the company that collected the samples. Northgate stated that the correct sample names are those identified in the revised report from EMSL, dated May 19, 2010. These sample IDs are listed in Tables 4 and D-10 and Figures 3 through 6 of the HRA.</p> <p>In reviewing Neptune's EDD, it appears that Neptune entered the information from the initial EMSL report, dated April 20, 2010. However, we request that the EDD be revised to reflect</p>	<p>Neptune concurs with the use of the sample names and associated results (analytical sensitivities and asbestos protocol counts) as given in the EMSL report dated May 19, 2010.</p>

	DVSR Comment	ENVIRON Response	Neptune and Company Response																		
Laboratory reports or supporting information have the following issues:																					
		<p>the sample IDs in the May 19, 2010 EMSL report, specifically,</p> <table border="0"> <tr><td>091003269-0001</td><td>P2-P2-1-1-0.0</td></tr> <tr><td>091003269-0002</td><td>P3-PF-1-1-0.0</td></tr> <tr><td>091003269-0003</td><td>P3-PF-2-1-0.0</td></tr> <tr><td>091003269-0004</td><td>P4-PF-1-1-0.0</td></tr> <tr><td>091003269-0005</td><td>Q2-PF-1-1-0.0</td></tr> <tr><td>091003269-0006</td><td>Q3-PF-1-1-0.0</td></tr> <tr><td>091003269-0007</td><td>Q3-PF-1-1-0.0-FD</td></tr> <tr><td>091003269-0008</td><td>Q3-PF-2-1-0.0</td></tr> <tr><td>091003269-0009</td><td>Q3-PF-3-1-0.0</td></tr> </table> <p>We note that although sample names changed between the initial and revised EMSL reports, the asbestos protocol counts for short and long chrysotile and amphibole remained the same (i.e., 0 counts in all samples).</p>	091003269-0001	P2-P2-1-1-0.0	091003269-0002	P3-PF-1-1-0.0	091003269-0003	P3-PF-2-1-0.0	091003269-0004	P4-PF-1-1-0.0	091003269-0005	Q2-PF-1-1-0.0	091003269-0006	Q3-PF-1-1-0.0	091003269-0007	Q3-PF-1-1-0.0-FD	091003269-0008	Q3-PF-2-1-0.0	091003269-0009	Q3-PF-3-1-0.0	
091003269-0001	P2-P2-1-1-0.0																				
091003269-0002	P3-PF-1-1-0.0																				
091003269-0003	P3-PF-2-1-0.0																				
091003269-0004	P4-PF-1-1-0.0																				
091003269-0005	Q2-PF-1-1-0.0																				
091003269-0006	Q3-PF-1-1-0.0																				
091003269-0007	Q3-PF-1-1-0.0-FD																				
091003269-0008	Q3-PF-2-1-0.0																				
091003269-0009	Q3-PF-3-1-0.0																				
5	<p>a) For sample TSB-FR-04-0-FD (lab ID 040728237-0052), the BSD was difficult to read and the structure counts could not be confirmed. It appeared there were 4 long and 4 short chrysotile vs. the 4 long and 5 short chrysotile listed in the laboratory report. Due to the inability to confirm counts, this report should be verified with the laboratory.</p>	<p>EMSL informed ENVIRON via email on April 29, 2014 that the original BSD reports were destroyed, consistent with laboratory procedures at the time the analyses were conducted; the scanned copy provided to ENVIRON is the only documentation available.</p> <p>ENVIRON concurs with Neptune's interpretation of 4 long and 4 short chrysotile fibers. Note that the discrepancy (i.e., 4 vs. 5 short chrysotile fibers) would not impact the risk assessment since, consistent with NDEP guidance, short fibers are not included in the quantitative risk evaluation of asbestos (NDEP 2011). Tables 4 and D-10 list 4 long and 4 short fibers and the laboratory report has been annotated to note the correction to the number of short chrysotile fibers.</p>	Acceptable response.																		

	DVSR Comment	ENVIRON Response	Neptune and Company Response
Laboratory reports or supporting information have the following issues:			
	b) Additionally, this sample could not be found on the CoC provided for this SDG 040728237.	<p>The CoC lists 51 samples, suggesting that the “last sample of the day” (i.e., the 52nd sample) was not entered on the CoC. Although no e-mail correspondence was identified for this sample, as noted in “part a” of this comment, the lab report shows that lab ID 040728237-0052 corresponds to field ID TSB-FR-04-0-FD.</p> <p>This information is correctly reported on revised Table D-10. We conclude that the analytical results for these samples are usable for risk assessment.</p>	This response is acceptable. Any future sampling/analysis should ensure CoCs have proper documentation.
6	The BSD for sample TSB-HJ-08-0 (lab ID 040801461-0020) could not be read; therefore counts could not be confirmed. Note that the counts in Table D10 are not in agreement with each other (e.g., 1 long chrysotile is listed, but there is a 0 for long asbestos structures). The counts for this sample have been corrected to be consistent, but have not been verified against the BSD due to readability issues. The sample date has also been corrected to match EMSL records.	<p>As noted in ENVIRON response #5, a more legible copy of the BSD report is not available.</p> <p>Although Neptune noted readability issues with the BSD report, ENVIRON was able to confirm that the results reported on the BSD report were consistent with the results reported on the Laboratory Report (i.e., the Excel file). Specifically, only one “asbestos protocol structure” is identified on the BSD report (one chrysotile fiber, length = 16.25 µm; width = 0.25 µm). This is the same as the number of protocol structures reported on the Laboratory report, i.e., a total of 1 protocol structure and 1 long (>10 µm) structure.</p> <p>Table D-10 has been revised to correctly report the results, i.e., 1 long chrysotile fiber and 1 for long asbestos structures.</p>	Acceptable response.
7	Lab IDs 040817194-0001 and 040817194-0002 are labeled as TSB-CJ-12-0 and TSB-CJ-13-0, respectively, in the Excel lab report files. It is believed that these samples are actually TSB-HJ-12-0 and TSB-HJ-13-0; this should be verified and corrected as necessary.	ENVIRON concurs that lab IDs 040817194-0001 and 040817194-0002 are mislabeled on the Excel report and will annotate the Excel report with the correct information. Revised Table D-10 correctly reports the results for samples TSB-HJ-12-0 and TSB-HJ-13-0 and associated results. We conclude that the analytical results for these samples are usable	This response is acceptable.

	DVSR Comment	ENVIRON Response	Neptune and Company Response
Laboratory reports or supporting information have the following issues:			
		for risk assessment.	
8	The Excel lab report for sample TSB-HR-01-0 (lab ID 040801461-0005) indicates that there is 1 long chrysotile structure. The BSD does not agree with this, the count should be 0. The Excel report should be corrected.	ENVIRON concurs that the Excel report is incorrect and will annotate the Excel report with the correct information. Revised Table D-10 correctly reports a count of zero (0). We conclude that the analytical results for these samples are usable for risk assessment.	This response is acceptable.
9	The BSDs for samples TSB-HR-08-0 (lab ID 040801461-0018) and TSB-GJ-05-0 (040728237-0042) are not legible. The counts could not be confirmed for these samples.	<p>As noted in ENVIRON response #5, a more legible copy of the BSD report is not available.</p> <ul style="list-style-type: none"> • TSB-HR-08-0 (lab ID 040801461-0018): As discussed with Neptune, the results from the Laboratory Results sheet (i.e., 0 Total Protocol Structures) will be reported on Table D-10. ENVIRON notes that the results on the legible portions of the BSD are consistent with the Laboratory Results report. • TSB-GJ-05-0: As noted above, the Parcel G boundary was changed in 2013 and this sample is no longer a part of the risk assessment data set. However, this sample would be included in the EDD, and as agreed in discussions with Neptune, the results for the Laboratory Results report would be used. 	Acceptable response.
10	----	<p>During our review, ENVIRON noted that Sample TSB-HR-07-0-FD was not included in the Neptune EDD. This sample is included in both Tables 4 and D-10.</p> <p>It appears that this sample (lab id 04801461-0017) should be included in the EDD.</p>	This is acceptable.

Reference

Nevada Division of Environmental Protection (NDEP). 2011. *Technical Guidance for the Calculation of Asbestos-Related Risk in Soils for the Basic Management Incorporated (BMI) Complex and Common Areas*, prepared by Neptune and Company Inc., for the Nevada Division of Environmental Protection.

Attachment B
Tables 4 and D-10

Attachment B
Tables 4 and D-10

TABLE 4
Parcel Soil Data Results Summary - Asbestos

Parcel	Sample ID	Sample Name	Number of Long Chrysotile Fibers (>10µm and <0.4µm)	Number of Long Amphibole Fibers (>10µm and <0.4µm)	Type of Long Amphibole Fibers (>10µm and <0.4µm)
Parcel C	G1-PC-1-1	G1-PC-1-1-0.0	0	0	--
Parcel C	H2-PC-1-1	H2-PC-1-1-0.0	0	0	--
Parcel C	TSB-CJ-01	TSB-CJ-01-0	1	0	--
Parcel C	TSB-CJ-02	TSB-CJ-02-0	0	0	--
Parcel C	TSB-CJ-04	TSB-CJ-04-0	1	0	--
Parcel C	TSB-CJ-05	TSB-CJ-05-0	0	0	--
Parcel C	TSB-CJ-06	TSB-CJ-06-0	0	0	--
Parcel C	TSB-CJ-07	TSB-CJ-07-0	0	0	--
Parcel C	TSB-CJ-08	TSB-CJ-08-0	1	0	--
Parcel C	TSB-CJ-10	TSB-CJ-10-0	0	0	--
Parcel C	TSB-CJ-11	TSB-CJ-11-0	0	0	--
Parcel C	TSB-CR-01	TSB-CR-01-0	1	0	--
Parcel C	TSB-CR-01	TSB-CR-01-0 FD	1	0	--
Parcel C	TSB-CR-04	TSB-CR-04-0	0	0	--
Parcel C	TSB-CR-05	TSB-CR-05-0	2	0	--
Parcel C	TSB-CR-06	TSB-CR-06-0	0	0	--
Parcel C	TSB-CR-07	TSB-CR-07-0	2	0	--
Parcel C	E1-PC-1-1	E1-PC-1-1-0.0	0	0	--
Parcel D	F4-PD-1-1	F4-PD-1-1-0.0	0	0	--
Parcel D	TSB-DJ-01	TSB-DJ-01-0	2	0	--
Parcel D	TSB-DR-01	TSB-DR-01-0	0	0	--
Parcel D	TSB-DR-02	TSB-DR-02-0	0	0	--
Parcel D	TSB-DR-02	TSB-DR-02-0 FD	0	0	--
Parcel D	TSB-DR-03	TSB-DR-03-0	0	0	--
Parcel D	TSB-DR-04E	TSB-DR-04E-0	3	0	--
Parcel D	TSB-DR-04W	TSB-DR-04W-0	0	0	--
Parcel D	TSB-DR-04W	TSB-DR-04W-0-FD	0	0	--
Parcel D	TSB-DR-05	TSB-DR-05-0	0	0	--
Parcel D	TSB-DR-06	TSB-DR-06-0	2	0	--
Parcel F	P2-P2-1-1	P2-P2-1-1-0.0	0	0	--
Parcel F	P3-PF-1-1	P3-PF-1-1-0.0	0	0	--
Parcel F	P3-PF-2-1	P3-PF-2-1-0.0	0	0	--

TABLE 4
Parcel Soil Data Results Summary - Asbestos

Parcel	Sample ID	Sample Name	Number of Long Chrysotile Fibers (>10µm and <0.4µm)	Number of Long Amphibole Fibers (>10µm and <0.4µm)	Type of Long Amphibole Fibers (>10µm and <0.4µm)
Parcel F	Q2-PF-1-1	Q2-PF-1-1-0.0	0	0	--
Parcel F	Q3-PF-1-1	Q3-PF-1-1-0.0	0	0	--
Parcel F	Q3-PF-1-1	Q3-PF-1-1-0.0-FD	0	0	--
Parcel F	Q3-PF-2-1	Q3-PF-2-1-0.0	0	0	--
Parcel F	TSB-FJ-04	TSB-FJ-04-0	2	0	--
Parcel F	P4-PF-1-1	P4-PF-1-1-0.0	0	0	--
Parcel F	TSB-FJ-09	TSB-FJ-09-0	3	0	--
Parcel F	TSB-FJ-10	TSB-FJ-10-0	2	0	--
Parcel F	TSB-FR-01	TSB-FR-01-0	0	0	--
Parcel F	Q3-PF-3-1	Q3-PF-3-1-0.0	0	0	--
Parcel F	TSB-FR-03	TSB-FR-03-0	0	0	--
Parcel F	TSB-FR-04	TSB-FR-04-0	3	0	--
Parcel F	TSB-FR-04	TSB-FR-04-0-FD	4	0	--
Parcel F	TSB-FR-05	TSB-FR-05-0	0	0	--
Parcel G	S3-PG-1-1	S3-PG-1-1-0.0	0	0	--
Parcel G	TSB-GJ-01	TSB-GJ-01-0	0	0	--
Parcel G	TSB-GJ-06	TSB-GJ-06-0	0	0	--
Parcel G	TSB-GJ-08	TSB-GJ-08-0	0	0	--
Parcel G	TSB-GR-01	TSB-GR-01-0	0	0	--
Parcel G	TSB-GR-01	TSB-GR-01-0-FD	0	0	--
Parcel H	TSB-HJ-01	TSB-HJ-01-0	0	0	--
Parcel H	TSB-HJ-02	TSB-HJ-02-0	0	0	--
Parcel H	TSB-HJ-03	TSB-HJ-03-0	0	0	--
Parcel H	TSB-HJ-04	TSB-HJ-04-0	0	0	--
Parcel H	TSB-HJ-05	TSB-HJ-05-0	0	0	--
Parcel H	TSB-HJ-06	TSB-HJ-06-0	0	0	--
Parcel H	TSB-HJ-07	TSB-HJ-07-0	0	0	--
Parcel H	TSB-HJ-08	TSB-HJ-08-0	1	0	--
Parcel H	TSB-HJ-09-NE	TSB-HJ-09-NE-0	0	0	--
Parcel H	TSB-HJ-10	TSB-HJ-10-0	0	0	--
Parcel H	TSB-HJ-11	TSB-HJ-11-0	1	0	--
Parcel H	TSB-HJ-12	TSB-HJ-12-0	0	0	--

TABLE 4
Parcel Soil Data Results Summary - Asbestos

Parcel	Sample ID	Sample Name	Number of Long Chrysotile Fibers (>10µm and <0.4µm)	Number of Long Amphibole Fibers (>10µm and <0.4µm)	Type of Long Amphibole Fibers (>10µm and <0.4µm)
Parcel H	TSB-HJ-13	TSB-HJ-13-0	0	0	--
Parcel H	TSB-HR-01	TSB-HR-01-0	0	0	--
Parcel H	TSB-HR-02	TSB-HR-02-0	0	0	--
Parcel H	TSB-HR-03	TSB-HR-03-0	1	0	--
Parcel H	TSB-HR-04	TSB-HR-04-0	0	0	--
Parcel H	TSB-HR-05	TSB-HR-05-0	0	0	--
Parcel H	TSB-HR-07	TSB-HR-07-0	0	0	--
Parcel H	TSB-HR-07	TSB-HR-07-0-FD	1	0	--
Parcel H	TSB-HR-08	TSB-HR-08-0	0	0	--
Parcel H	V5-PH-1-1	V5-PH-1-1-0.0	0	0	--
Parcel H	W4-PH-1-1	W4-PH-1-1-0.0	0	0	--
Summary - All Samples					
Total Number of Samples:			75	75	
Total Number of Fibers:			34	0	
Number of Sample Locations with Detections:			19	0	
Maximum Number of Fibers Counted in a Sample:			4	0	

TABLE D-10
Parcel Asbestos Soil Results

Analyte Name Units						Long Amphibole Protocol Structures Count	Long Chrysotile Protocol Structures Count	Total Long Asbestos Protocol Structures Count (2)	Short Amphibole Protocol Structures Count (1)	Short Chrysotile Protocol Structures Count (1)	Total Short Asbestos Protocol Structures Count (1) (2)	Total Amphibole Protocol Structures Count	Total Chrysotile Protocol Structures Count	Total Asbestos Protocol Structures Count (2)	s/gPM10
Parcel	Sample ID	Sample Name	Sample Type	Sample Date	Start Depth (ft)	Result	Result	Result	Result	Result	Result	Result	Result	Result	Analytical Sensitivity
Parcel C	G1-PC-1-1	G1-PC-1-1-0.0	N	4/13/2010	0	0	0	0	0	0	0	0	0	0	2960000
Parcel C	H2-PC-1-1	H2-PC-1-1-0.0	N	4/14/2010	0	0	0	0	0	0	0	0	0	0	2970000
Parcel C	TSB-CJ-01	TSB-CJ-01-0	N	11/5/2007	0	0	1	1	0	0	0	0	1	1	2996902
Parcel C	TSB-CJ-02	TSB-CJ-02-0	N	11/2/2007	0	0	0	0	0	0	0	0	0	0	2985422
Parcel C	TSB-CJ-03	TSB-CJ-03-0	N	11/2/2007	0	1	1	2	0	2	2	1	3	4	2669977
Parcel C	TSB-CJ-04	TSB-CJ-04-0	N	11/2/2007	0	0	1	1	0	1	1	0	2	2	2939784
Parcel C	TSB-CJ-05	TSB-CJ-05-0	N	11/2/2007	0	0	0	0	0	0	0	0	0	0	2975224
Parcel C	TSB-CJ-06	TSB-CJ-06-0	N	11/2/2007	0	0	0	0	1	2	3	1	2	3	2989641
Parcel C	TSB-CJ-07	TSB-CJ-07-0	N	11/2/2007	0	0	0	0	0	0	0	0	0	0	2977917
Parcel C	TSB-CJ-08	TSB-CJ-08-0	N	11/2/2007	0	0	1	1	1	4	5	1	5	6	2985422
Parcel C	TSB-CJ-10	TSB-CJ-10-0	N	7/8/2008	0	0	0	0	0	0	0	0	0	0	2973432
Parcel C	TSB-CJ-11	TSB-CJ-11-0	N	7/8/2008	0	0	0	0	0	0	0	0	0	0	2999026
Parcel C	TSB-CR-01	TSB-CR-01-0	N	11/2/2007	0	0	1	1	1	2	3	1	3	4	2978516
Parcel C	TSB-CR-01	TSB-CR-01-0 FD	FD	11/2/2007	0	0	1	1	0	1	1	0	2	2	2978516
Parcel C	TSB-CR-02	TSB-CR-02-0	N	11/2/2007	0	1	3	4	1	5	6	2	8	10	2959171
Parcel C	TSB-CR-03	TSB-CR-03-0	N	11/2/2007	0	0	7	7	0	2	2	0	9	9	2958580
Parcel C	TSB-CR-04	TSB-CR-04-0	N	11/2/2007	0	0	0	0	0	0	0	0	0	0	2985422
Parcel C	TSB-CR-05	TSB-CR-05-0	N	11/2/2007	0	0	2	2	0	0	0	0	2	2	2854495
Parcel C	TSB-CR-06	TSB-CR-06-0	N	11/2/2007	0	0	0	0	0	0	0	0	0	0	2997509
Parcel C	TSB-CR-07	TSB-CR-07-0	N	11/2/2007	0	0	2	2	0	4	4	0	6	6	2975224
Parcel C	E1-PC-1-1	E1-PC-1-1-0.0	N	4/13/2010	0	0	0	0	0	0	0	0	0	0	2960000
Parcel D	F4-PD-1-1	F4-PD-1-1-0.0	N	4/13/2010	0	0	0	0	0	0	0	0	0	0	2990000
Parcel D	TSB-DJ-01	TSB-DJ-01-0	N	11/2/2007	0	0	2	2	0	1	1	0	3	3	2956512
Parcel D	TSB-DR-01	TSB-DR-01-0	N	11/2/2007	0	0	0	0	0	0	0	0	0	0	2981515
Parcel D	TSB-DR-02	TSB-DR-02-0	N	11/2/2007	0	0	0	0	0	0	0	0	0	0	2964503
Parcel D	TSB-DR-02	TSB-DR-02-0 FD	FD	11/2/2007	0	0	0	0	0	0	0	0	0	0	2964503
Parcel D	TSB-DR-03	TSB-DR-03-0	N	11/2/2007	0	0	0	0	1	0	1	1	0	1	2997812
Parcel D	TSB-DR-04	TSB-DR-04-0	N	11/2/2007	0	0	4	4	0	1	1	0	5	5	2983016
Parcel D	TSB-DR-05	TSB-DR-05-0	N	11/2/2007	0	0	0	0	0	0	0	0	0	0	2995083
Parcel D	TSB-DR-06	TSB-DR-06-0	N	11/2/2007	0	0	2	2	0	0	0	0	2	2	2960058
Parcel D	TSB-DR-04E	TSB-DR-04E-0	N	6/4/2008	0	0	3	3	0	5	5	0	8	8	2961242
Parcel D	TSB-DR-04W	TSB-DR-04W-0	N	6/4/2008	0	0	0	0	0	1	1	0	1	1	2998419
Parcel D	TSB-DR-04W	TSB-DR-04W-0-FD	FD	6/4/2008	0	0	0	0	0	1	1	0	1	1	2972537
Parcel F	P2-PF-1-1	P2-PF-1-1-0.0	N	4/6/2010	0	0	0	0	0	0	0	0	0	0	2960000
Parcel F	P3-PF-1-1	P3-PF-1-1-0.0	N	4/6/2010	0	0	0	0	0	0	0	0	0	0	2960000
Parcel F	P3-PF-2-1	P3-PF-2-1-0.0	N	4/6/2010	0	0	0	0	0	0	0	0	0	0	3000000
Parcel F	Q2-PF-1-1	Q2-PF-1-1-0.0	N	4/6/2010	0	0	0	0	0	0	0	0	0	0	2990000
Parcel F	Q3-PF-1-1	Q3-PF-1-1-0.0	N	4/6/2010	0	0	0	0	0	0	0	0	0	0	2990000
Parcel F	Q3-PF-1-1	Q3-PF-1-1-0.0-FD	FD	4/6/2010	0	0	0	0	0	0	0	0	0	0	2970000
Parcel F	TSB-FJ-01	TSB-FJ-01-0	N	11/2/2007	0	0	15	15	0	8	8	0	23	23	2997509
Parcel F	TSB-FJ-02	TSB-FJ-02-0	N	11/2/2007	0	0	20	20	0	20	20	0	40	40	2970152
Parcel F	TSB-FJ-03	TSB-FJ-03-0	N	11/2/2007	0	0	8	8	0	16	16	0	24	24	2991453
Parcel F	TSB-FJ-04	TSB-FJ-04-0	N	11/2/2007	0	0	2	2	1	5	6	1	7	8	2955627
Parcel F	Q3-PF-2-1	Q3-PF-2-1-0.0	N	4/6/2010	0	0	0	0	0	0	0	0	0	0	2990000
Parcel F	P4-PF-1-1	P4-PF-1-1-0.0	N	4/6/2010	0	0	0	0	0	0	0	0	0	0	2960000
Parcel F	TSB-FJ-05	TSB-FJ-05-0	N	11/2/2007	0	1	3	4	0	1	1	1	5	6	2991453
Parcel F	TSB-FJ-05	TSB-FJ-05-0-FD	FD	11/2/2007	0	0	0	0	0	3	3	0	3	3	2833466
Parcel F	TSB-FJ-06	TSB-FJ-06-0	N	11/2/2007	0	1	0	1	0	1	1	1	1	2	2973432
Parcel F	TSB-FJ-07	TSB-FJ-07-0	N	11/2/2007	0	4	0	4	21	0	21	25	0	25	7582024
Parcel F	TSB-FJ-08	TSB-FJ-08-0	N	11/2/2007	0	3	0	3	23	0	23	26	0	26	13710826
Parcel F	TSB-FJ-09	TSB-FJ-09-0	N	11/2/2007	0	0	3	3	0	7	7	0	10	10	2997509
Parcel F	TSB-FJ-10	TSB-FJ-10-0	N	11/2/2007	0	0	2	2	0	4	4	0	6	6	2946804

**TABLE D-10
Parcel Asbestos Soil Results**

Parcel	Analyte Name Units					Long Amphibole Protocol Structures Count	Long Chrysotile Protocol Structures Count	Total Long Asbestos Protocol Structures Count (2)	Short Amphibole Protocol Structures Count (1)	Short Chrysotile Protocol Structures Count (1)	Total Short Asbestos Protocol Structures Count (1) (2)	Total Amphibole Protocol Structures Count	Total Chrysotile Protocol Structures Count	Total Asbestos Protocol Structures Count (2)	s/gPM10
	TSB-#	TSB-#-0	N	Date	Units	s/samp	s/samp	s/samp	s/samp	s/samp	s/samp	s/samp	s/samp	s/samp	
Parcel F	TSB-FR-01	TSB-FR-01-0	N	11/2/2007	0	0	0	0	0	1	1	0	1	1	2954448
Parcel F	Q3-PF-3-1	Q3-PF-3-1-0.0	N	4/6/2010	0	0	0	0	0	0	0	0	0	0	3000000
Parcel F	TSB-FR-02	TSB-FR-02-0	N	11/2/2007	0	0	7	7	0	20	20	0	27	27	2993267
Parcel F	TSB-FR-03	TSB-FR-03-0	N	11/2/2007	0	0	0	0	0	0	0	0	0	0	2986626
Parcel F	TSB-FR-04	TSB-FR-04-0	N	11/2/2007	0	0	3	3	0	2	2	0	5	5	2986626
Parcel F	TSB-FR-04	TSB-FR-04-0-FD	FD	11/2/2007	0	0	4	4	0	4	4	0	8	8	2954448
Parcel F	TSB-FR-05	TSB-FR-05-0	N	11/2/2007	0	0	0	0	0	0	0	0	0	0	2978516
Parcel G	S3-PG-1-1	S3-PG-1-1-0.0	N	4/14/2010	0	0	0	0	0	0	0	0	0	0	2960000
Parcel G	TSB-GJ-01	TSB-GJ-01-0	N	11/2/2007	0	0	0	0	0	1	1	0	1	1	2678913
Parcel G	TSB-GJ-06	TSB-GJ-06-0	N	11/2/2007	0	0	0	0	0	0	0	0	0	0	2980614
Parcel G	TSB-GJ-08	TSB-GJ-08-0	N	6/4/2008	0	0	0	0	0	0	0	0	0	0	2983016
Parcel G	TSB-GJ-09	TSB-GJ-09-0.00	N	6/4/2008	0	13	0	13	15	0	15	28	0	28	2975224
Parcel G	TSB-GR-01	TSB-GR-01-0	N	11/2/2007	0	0	0	0	1	0	1	1	0	1	2992057
Parcel G	TSB-GR-01	TSB-GR-01-0-FD	FD	11/2/2007	0	0	0	0	0	0	0	0	0	0	2966285
Parcel H	TSB-HJ-01	TSB-HJ-01-0	N	1/18/2008	0	0	0	0	0	0	0	0	0	0	2999026
Parcel H	TSB-HJ-02	TSB-HJ-02-0	N	1/18/2008	0	0	0	0	0	1	1	0	1	1	2991453
Parcel H	TSB-HJ-03	TSB-HJ-03-0	N	1/18/2008	0	0	0	0	0	0	0	0	0	0	2986626
Parcel H	TSB-HJ-04	TSB-HJ-04-0	N	1/18/2008	0	0	0	0	0	0	0	0	0	0	2999026
Parcel H	TSB-HJ-05	TSB-HJ-05-0	N	1/18/2008	0	0	0	0	0	1	1	0	1	1	2960354
Parcel H	TSB-HJ-06	TSB-HJ-06-0	N	1/18/2008	0	0	0	0	0	0	0	0	0	0	2960354
Parcel H	TSB-HJ-07	TSB-HJ-07-0	N	1/18/2008	0	0	0	0	0	0	0	0	0	0	2310813
Parcel H	TSB-HJ-08	TSB-HJ-08-0	N	1/18/2008	0	0	1	1	0	0	0	0	1	1	2974627
Parcel H	TSB-HJ-09	TSB-HJ-09-0	N	1/18/2008	0	2	8	10	1	15	16	3	23	26	4170006
Parcel H	TSB-HJ-09	TSB-HJ-09-0-FD	FD	1/18/2008	0	1	3	4	1	13	14	2	16	18	2975224
Parcel H	TSB-HJ-09-NE	TSB-HJ-09-NE-0	N	6/4/2008	0	0	0	0	0	0	0	0	0	0	2973432
Parcel H	TSB-HJ-10	TSB-HJ-10-0	N	1/18/2008	0	0	0	0	0	0	0	0	0	0	2985422
Parcel H	TSB-HJ-11	TSB-HJ-11-0	N	1/18/2008	0	0	1	1	0	0	0	0	1	1	2868318
Parcel H	TSB-HJ-12	TSB-HJ-12-0	N	7/8/2008	0	0	0	0	0	0	0	0	0	0	2952092
Parcel H	TSB-HJ-13	TSB-HJ-13-0	N	7/8/2008	0	0	0	0	0	0	0	0	0	0	2914900
Parcel H	TSB-HR-01	TSB-HR-01-0	N	1/18/2008	0	0	0	0	0	0	0	0	0	0	2978516
Parcel H	TSB-HR-02	TSB-HR-02-0	N	1/18/2008	0	0	0	0	0	0	0	0	0	0	2993267
Parcel H	TSB-HR-03	TSB-HR-03-0	N	1/18/2008	0	0	1	1	0	0	0	0	1	1	2985422
Parcel H	TSB-HR-04	TSB-HR-04-0	N	1/18/2008	0	0	0	0	0	1	1	0	1	1	2971046
Parcel H	TSB-HR-05	TSB-HR-05-0	N	1/18/2008	0	0	0	0	0	0	0	0	0	0	2996902
Parcel H	TSB-HR-06	TSB-HR-06-0	N	1/18/2008	0	1	0	1	0	0	0	1	0	1	2960354
Parcel H	TSB-HR-07	TSB-HR-07-0	N	1/18/2008	0	0	0	0	0	0	0	0	0	0	2956512
Parcel H	TSB-HR-07	TSB-HR-07-0-FD	FD	1/18/2008	0	0	1	1	0	0	0	0	1	1	2994477
Parcel H	TSB-HR-08	TSB-HR-08-0	N	1/18/2008	0	0	0	0	0	0	0	0	0	0	2978216
Parcel H	V5-PH-1-1	V5-PH-1-1-0.0	N	4/9/2010	0	0	0	0	0	0	0	0	0	0	2980000
Parcel H	W4-PH-1-1	W4-PH-1-1-0.0	N	4/9/2010	0	0	0	0	0	0	0	0	0	0	2980000

(1) Data reported for samples collected in 2010; data calculated (short = total minus long) for earlier data.

(2) Sum of amphibole and chrysotile asbestos structures

Soil sample excavated and data excluded from HRA calculations

Some samples that are included in the Data Validation Summary Reports (Appendix C) were collected from outside the boundaries of the Parcels and are excluded from this table.