FOR CONTRACT NO.: 03-4E8804

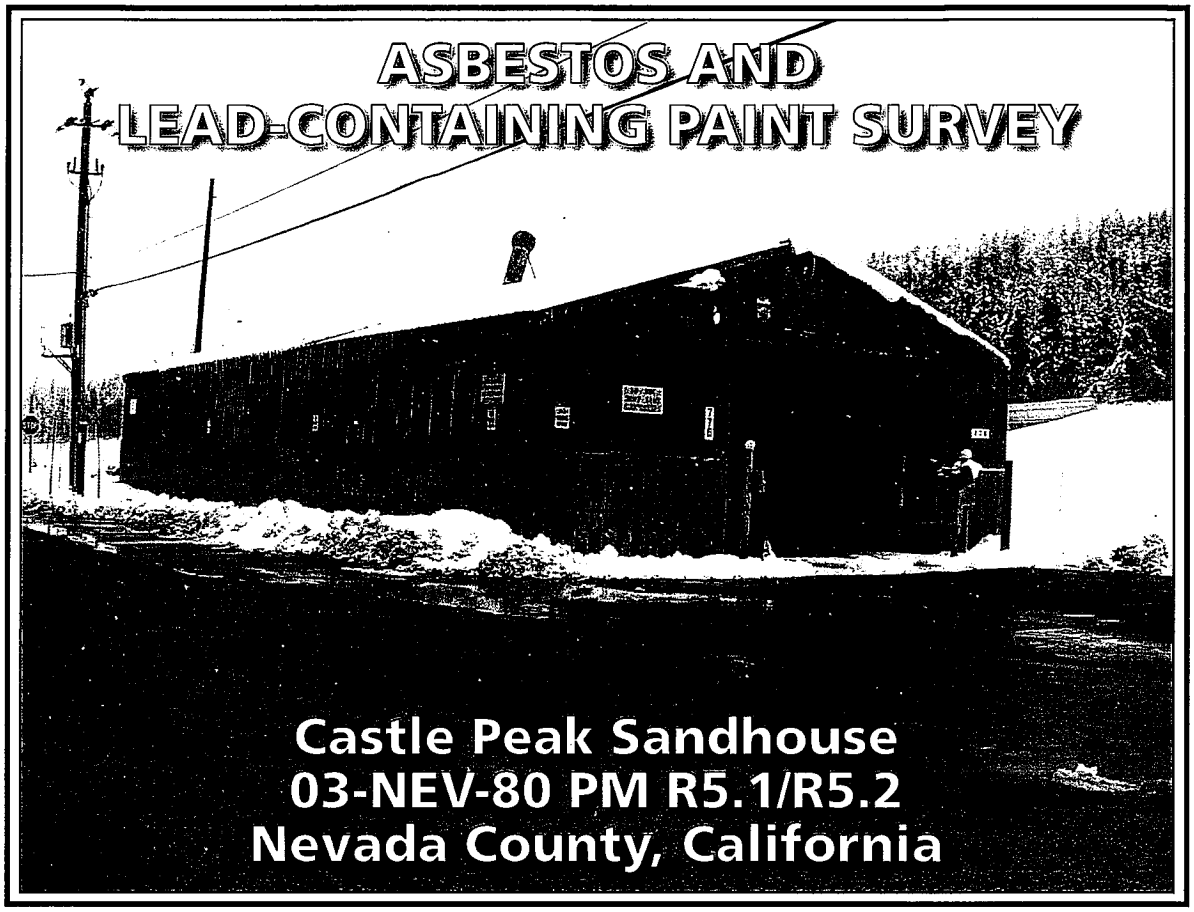
INFORMATION HANDOUT

MATERIALS INFORMATION

ASBESTOS AND LEAD-CONTAINING PAINT SURVEY
CASTLE PEAK SAND HOUSE
Dated November 2010

ROUTE: 03-Nev-5917-

ASBESTOS AND LEAD-CONTAINING PAINT SURVEY



Castle Peak Sandhouse
03-NEV-80 PM R5.1/R5.2
Nevada County, California

PREPARED FOR:

CALIFORNIA DEPARTMENT OF TRANSPORTATION
DISTRICT 3
703 B STREET, P.O. BOX 911
MARYSVILLE, CALIFORNIA 95901

Caltrans®

PREPARED BY:

GEOCON CONSULTANTS, INC.
3160 GOLD VALLEY DRIVE, SUITE 800
RANCHO CORDOVA, CALIFORNIA 95742

GEOCON

GEOCON PROJECT NO. S9300-06-146
TASK ORDER NO. 146,
E-FIS 03 0000 0727 1 (EA 03-4E8801)
CONTRACT NO 03A1368

NOVEMBER 2010

GEOCON
CONSULTANTS, INC.
GEOTECHNICAL ■ ENVIRONMENTAL ■ MATERIALS

Project No. S9300-06-146
November 29, 2010

Alicia Beyer, Task Order Manager
Caltrans District 3
703 B Street/P.O. Box 911
Marysville, California 95901

Subject: CASTLE PEAK SANDHOUSE IN NEVADA COUNTY, CALIFORNIA
CONTRACT NO. 03A1368, E-FIS 03 0000 0727 1 (EA 03-4E8801)
TASK ORDER NO. 146, 03-NEV-80 PM R5.1/R5.2
ASBESTOS-CONTAINING MATERIALS AND LEAD-CONTAINING PAINT SURVEY REPORT

Dear Ms. Beyer:

In accordance with California Department of Transportation Contract No. 03A1368 and Task Order No. 146, we have performed an asbestos and lead-containing paint survey of the subject property in Nevada County, California. The scope of services included surveying the structure for suspect asbestos-containing materials and lead-containing paint, collecting bulk samples, and submitting the samples to laboratories for analyses.

The accompanying report summarizes the services performed and laboratory analysis.

The contents of this report reflect the views of Geocon Consultants, Inc., who are responsible for the facts and accuracy of the data presented herein. The contents do not necessarily reflect the official views or policies of the State of California or the Federal Highway Administration. This report does not constitute a standard, specification, or regulation.

Please contact us if you have questions concerning the contents of this report or if we may be of further service.

Sincerely,

GEOCON CONSULTANTS, INC.

David A. Watts, CAC
Senior Project Scientist

John E. Jularend, PE, CEG
Project Manager

(4 + 4 CDs) Addressee

TABLE OF CONTENTS

ASBESTOS-CONTAINING MATERIALS AND LEAD-CONTAINING PAINT SURVEY REPORT

Page

1.0 INTRODUCTION 1
1.1 Project Description 1
1.2 General Objectives 1

2.0 BACKGROUND 1
2.1 Asbestos 1
2.2 Lead Paint 2
2.3 Architectural Drawings and Previous Survey Activities 3

3.0 SCOPE OF SERVICES 3
3.1 Asbestos 4
3.2 Lead Paint 4

4.0 INVESTIGATIVE RESULTS 5
4.1 Asbestos Analytical Results 5
4.2 Paint Analytical Results 5

5.0 RECOMMENDATIONS 6
5.1 Asbestos 6
5.2 Lead Paint 6

6.0 REPORT LIMITATIONS 7

FIGURES
1. Vicinity Map
2. Site Plan

PHOTOGRAPHS (1 through 6)

TABLES
1. Summary of Asbestos Analytical Results
2. Summary of Paint Analytical Results – Total and Soluble Lead

APPENDIX
A. Analytical Laboratory Reports and Chain-of-custody Documentation

ASBESTOS-CONTAINING MATERIALS AND LEAD-CONTAINING PAINT SURVEY REPORT

1.0 INTRODUCTION

This asbestos and lead-containing paint (LCP) survey report was prepared by Geocon Consultants, Inc. under Caltrans Contract No. 03A1368, Task Order No. 146 (TO-146).

1.1 Project Description

The project consists of the Castle Peak Sandhouse at Post Mile (PM) R5.1 on eastbound Interstate 80 in Nevada County, California. We performed asbestos and LCP survey activities at the structure. The approximate project location is depicted on the Vicinity Map, Figure 1. The approximate sample locations are depicted on the Site Plan, Figure 2.

1.2 General Objectives

The purpose of the scope of services outlined in TO-146 was to determine the presence and quantity of asbestos and LCP at the project location prior to planned demolition. The information obtained from this investigation will be used by Caltrans for waste profiling, determining California Occupational Safety and Health Administration (Cal/OSHA) applicability, and coordinating asbestos and LCP disturbance activities.

> *It was <u>not</u> Geocon's intent during this inspection to conduct an evaluation of lead-based paint hazards in accordance with U.S. Department of Housing and Urban Development (HUD) guidelines.*

2.0 BACKGROUND

2.1 Asbestos

The *Code of Federal Regulations (CFR),* 40 CFR 61, Subpart M, National Emissions Standards for Hazardous Air Pollutants (NESHAP) and Federal Occupational Safety and Health Administration (FED OSHA) classify asbestos-containing material (ACM) as any material or product that contains *greater than* 1% asbestos. Nonfriable ACM is classified by NESHAP as either Category I or Category II material defined as follows:

- **Category I** – asbestos-containing packings, gaskets, resilient floor coverings, and asphalt roofing products.
- **Category II** – all remaining types of nonfriable asbestos-containing material not included in Category I that when dry, cannot be crumbled, pulverized, or reduced to powder by hand pressure.

Regulated asbestos-containing material (RACM), a hazardous waste when friable, is classified as any manufactured material that contains *greater than* 1% asbestos by dry weight *and* is:

- Friable (can be crumbled, pulverized, or reduced to powder by hand pressure); or
- Category I material that has become friable; or
- Category I material that has been subjected to sanding, grinding, cutting, or abrading; or
- Category II nonfriable material that has a high probability of becoming crumbled, pulverized, or reduced to a powder during demolition or renovation activities.

Activities that disturb materials containing *any* amount of asbestos are subject to certain requirements of the Cal/OSHA asbestos standard contained in Title 8, CCR Section 1529. Typically, removal or disturbance of more than 100 square feet of material containing more than 0.1% asbestos must be performed by a registered asbestos abatement contractor, but associated waste labeling is not required if the material contains 1% or less asbestos. When the asbestos content of a material exceeds 1%, virtually all requirements of the standard become effective.

Materials containing more than 1% asbestos are also subject to NESHAP regulations (40 CFR Part 61, Subpart M). RACM (friable ACM and nonfriable ACM that will become friable during demolition operations) must be removed from structures prior to demolition. Certain nonfriable ACM and materials containing 1% or less asbestos may remain in structures during demolition; however, there are waste handling/disposal issues and Cal/OSHA work requirements that must be addressed. Contractors are responsible for segregating and characterizing waste streams prior to disposal.

With respect to potential worker exposure, notification, and registration requirements, Cal/OSHA defines asbestos-containing construction material (ACCM) as construction material that contains more than 0.1% asbestos (Title 8, CCR 341.6).

2.2 Lead Paint

Construction activities (including demolition) that disturb materials or paints containing *any* amount of lead are subject to certain requirements of the Cal/OSHA lead standard contained in Title 8, CCR, Section 1532.1. Deteriorated paint is defined by Title 17, CCR, Division 1, Chapter 8, §35022 as a surface coating that is cracking, chalking, flaking, chipping, peeling, non-intact, failed, or otherwise separating from a substrate. Demolition of a deteriorated LCP component would require waste characterization and appropriate disposal. Intact LCP on a component is currently accepted by most landfill facilities; however, contractors are responsible for segregating and characterizing waste streams prior to disposal.

For a solid waste containing lead, the waste is classified as California hazardous when: 1) the total lead content equals or exceeds the respective Total Threshold Limit Concentration (TTLC) of 1,000 milligrams per kilogram (mg/kg); or 2) the soluble lead content equals or exceeds the respective

Soluble Threshold Limit Concentration (STLC) of 5 milligrams per liter (mg/l) based on the standard Waste Extraction Test (WET). A waste has the potential for exceeding the lead STLC when the waste's total lead content is greater than or equal to ten times the respective STLC value since the WET uses a 1:10 dilution ratio. Hence, when total lead is detected at a concentration greater than or equal to 50 mg/kg, and assuming that 100 percent of the total lead is soluble, soluble lead analysis is required. Lead-containing waste is classified as "Resource, Conservation, and Recovery Act" (RCRA) hazardous, or Federal hazardous, when the soluble lead content equals or exceeds the Federal regulatory level of 5 mg/l based on the Toxicity Characteristic Leaching Procedure (TCLP).

The above regulatory criteria are based on chemical concentrations. Wastes may also be classified as hazardous based on other criteria such as ignitability; however, for the purposes of this investigation, toxicity (i.e., lead concentration) is the primary factor considered for waste classification since waste generated during the construction activities would not likely warrant testing for ignitability or other criteria. Waste that is classified as either California-hazardous or RCRA-hazardous requires management as a hazardous waste.

Potential hazards exist to workers who remove or cut through LCP coatings during demolition. Dust containing hazardous concentrations of lead may be generated during scraping or cutting materials coated with lead-containing paint. Torching of these materials may produce lead oxide fumes. Therefore, air monitoring and/or respiratory protection may be required during the demolition of materials coated with LCP. Guidelines regarding regulatory provisions for construction work where workers may be exposed to lead are presented in Title 8, CCR, Section 1532.1.

2.3 Architectural Drawings and Previous Survey Activities

We reviewed structure architectural plans provided by Caltrans prior to field activities. We observed no evidence of asbestos or lead paint use on the architectural plans provided. Previous asbestos survey reports were not available for our review.

3.0 SCOPE OF SERVICES

Mr. David Watts, a California-Certified Asbestos Consultant (CAC), certification No. 98-2404 (expiration September 16, 2011), and Certified Lead Paint Inspector/Assessor and Project Monitor with the California Department of Public Health Services (DPH), certification numbers I-1734 and M-1734 (expiration December 4, 2011), performed the asbestos and LCP survey at the project location on November 9, 2010.

3.1 Asbestos

Suspect ACM were grouped into homogeneous areas with representative samples randomly collected from each. In addition, each potential ACM was evaluated for friability. A total of four bulk asbestos samples representing two suspect components were collected.

Our procedures for inspection and sampling in accordance with TO-146 are discussed below:

- Collected bulk asbestos samples after first wetting friable material with a light mist of water. The samples were then cut from the substrate and transferred to a labeled container. Note that when multiple samples were collected, the sampling locations were distributed throughout the homogeneous area (spaces where the material was observed).
- Relinquished bulk asbestos samples to EMSL Analytical, Inc., a California-licensed and Caltrans-approved subcontractor, for asbestos analysis in accordance with United States Environmental Protection Agency (EPA) Test Method 600/R-93/116 using polarized light microscopy (PLM) under chain-of-custody protocol. EMSL Analytical, Inc. is a laboratory accredited by the National Institute of Standards and Technology National Voluntary Laboratory Accreditation Program (NIST-NVLAP) for bulk asbestos fiber analysis. The laboratory analyses were requested on a standard turn-around-time.

Sample identification numbers, material descriptions, approximate quantities, friability assessments, and photo references are summarized on Table 1. Approximate sample locations are presented on Figure 2. Materials represented by the samples collected are shown in the attached photographs.

3.2 Lead Paint

Seven bulk paint samples were collected from suspect LCP observed at the project location. Our sampling procedures in accordance with TO-146 are discussed below:

- Collected bulk samples of suspect LCP using techniques presented in HUD guidelines. In addition, the painted areas were evaluated for evidence of deterioration such as flaking or cracking.
- Relinquished bulk LCP samples under chain-of-custody protocol to Advanced Technology Laboratories, a California-licensed and Caltrans-approved subcontractor, for lead analysis in accordance with EPA Test Method 6010B. Advanced Technology Laboratories is accredited by the DPH for lead analysis. The laboratory analysis was requested on a standard turn-around-time.

Paint sample identification numbers, descriptions, peeling and flaking quantities, and photo references are summarized on Table 2. Approximate sample locations are presented on Figure 2. Materials represented by the samples collected are shown in the attached photographs.

4.0 INVESTIGATIVE RESULTS

4.1 Asbestos Analytical Results

No asbestos was detected in samples of the suspect materials collected during our survey. A summary of the analytical laboratory test results for asbestos is presented on Table 1. Reproductions of the laboratory reports and chain-of-custody documentation are presented in Appendix A.

4.2 Paint Analytical Results

Samples representing approximately 750 square feet of deteriorated brown paint used on the sandhouse exterior exhibited total lead concentrations of 660 and 91 mg/kg, and a composite WET lead concentration of less than (<) 0.25 mg/l.

A sample representing green paint used on the sandhouse roof exhibited a total lead concentration of 10,000 mg/kg and a TCLP concentration of <4.5 mg/l. We were not able to observe the condition of the paint due to snow coverage on the roof.

Samples representing approximately 2,500 square feet of deteriorated white paint used on the sandhouse interior (upper columns, walls, and ceiling) exhibited total lead concentrations of 15 and 12 mg/kg.

Samples representing approximately 500 square feet of deteriorated black paint used on the sandhouse interior (lower columns) exhibited total a lead concentration of 13 mg/kg.

A summary of the analytical laboratory test results for paint is presented on Table 2. Reproductions of the laboratory reports and chain-of-custody documentation are presented in Appendix A.

5.0 RECOMMENDATIONS

Based on our findings, we recommend the following:

5.1 Asbestos

Since no asbestos was detected in samples collected during our survey, the Cal/OSHA asbestos standard does not apply for planned activities. In addition, demolition debris would not be considered as a California hazardous waste based on asbestos content. However, written notification to U.S. EPA Region IX and the California Air Resources Board is required ten working days prior to commencement of *any* demolition activity (whether asbestos is present or not).

5.2 Lead Paint

Deteriorated brown exterior paint sampled during our survey would not be classified as California or Federal hazardous based on lead content.

Green roofing paint sampled during our survey would be classified as California hazardous based on lead content if it is: 1) determined to be deteriorated (this would require removal and disposal prior to demolition); or 2) stripped, blasted, or otherwise separated from the substrate. We were not able to observe the condition of the roofing paint due to snow coverage. There are no estimated removal costs as there is no known paint at the site that requires removal. If the paint on the roof is intact, there would be no costs for removal/disposal.

Interior paints sampled during our survey would not be classified as California or Federal hazardous based on lead content.

We recommend that all paints at the project location be treated as lead-containing for purposes of determining the applicability of the Cal/OSHA lead standard during any future maintenance, renovation, and demolition activities. This recommendation is based on LCP sample results and the fact that lead was a common ingredient of paints manufactured before 1978 and is still an ingredient of some paints. In accordance with Title 8, CCR, Section 1532.1(p), written notification to the nearest Cal/OSHA district office is required at least 24 hours prior to certain lead-related work. Compliance and training requirements regarding construction activities where workers may be exposed to lead are presented in Title 8, CCR, Section 1532.1, subsections (e) and (l), respectively. Contractors are responsible for segregating and characterizing waste streams prior to disposal.

6.0 REPORT LIMITATIONS

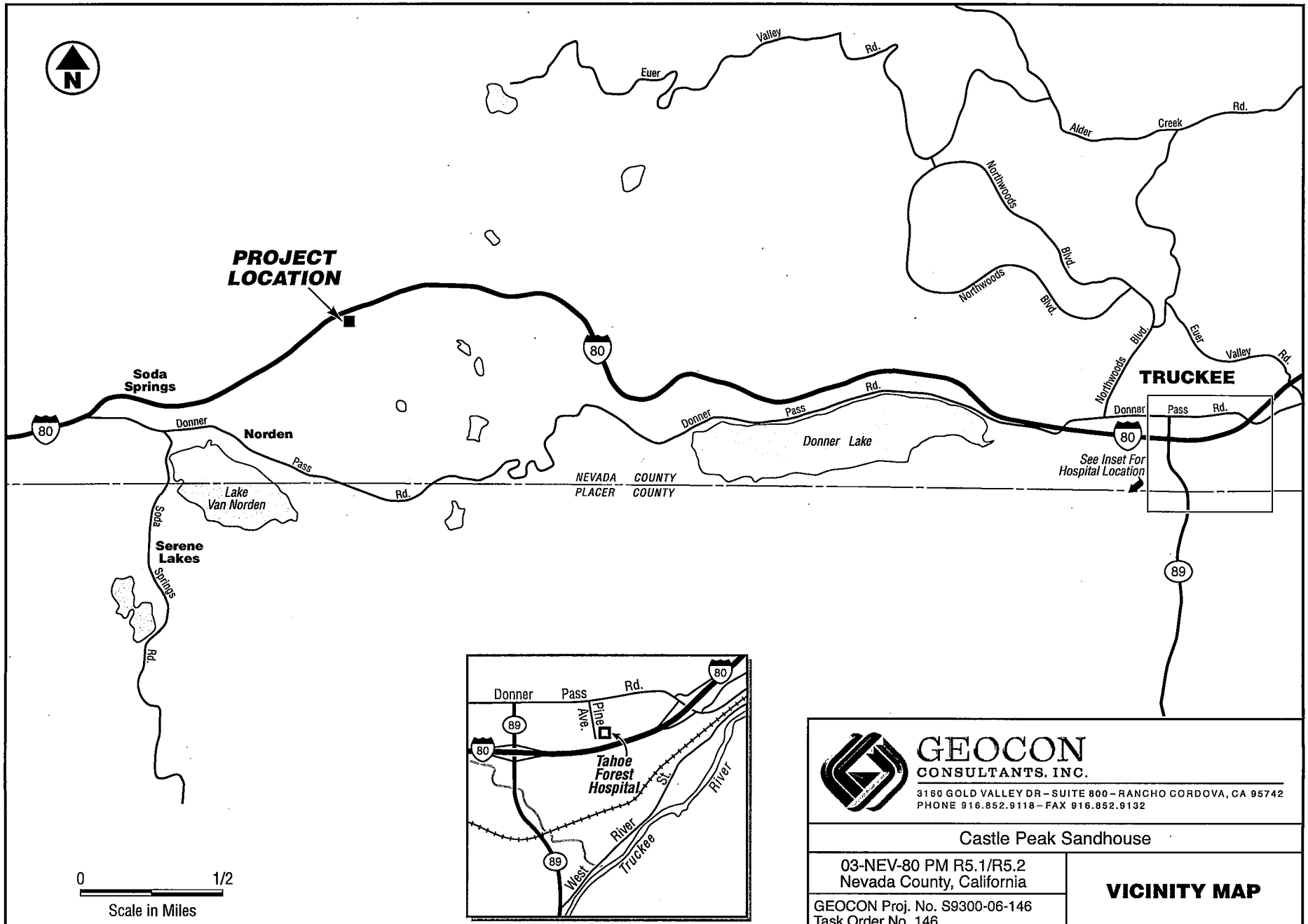
The asbestos and LCP survey was conducted in conformance with generally accepted standards of practice for identifying and evaluating asbestos and LCP in structures. The survey addressed only the structure identified in Section 1.1. Due to the nature of structure surveys, asbestos and LCP use, and laboratory analytical limitations, some ACM or LCP at the project location may not have been identified. Spaces such as cavities, voids, crawlspaces, and pipe chases may have been concealed to our investigator. Previous renovation work may have concealed or covered spaces or materials or may have partially demolished materials and left debris in inaccessible areas. Additionally, renovation activities may have partially replaced ACM with indistinguishable non-ACM. Asbestos and/or LCP may exist in areas of the structure that were not accessible or sampled in conjunction with this TO. (We were not able to observe the condition of the roofing paint due to snow coverage.)

During renovation or demolition operations, suspect materials may be uncovered which are different from those accessible for sampling during this assessment. Personnel in charge of renovation/demolition should be alerted to note materials uncovered during such activities that differ substantially from those included in this or previous assessment reports. If suspect ACM and/or LCP are found, additional sampling and analysis should be performed to determine if the materials contain asbestos or lead.

This report has been prepared exclusively for Caltrans. The information contained herein is only valid as of the date of the report and will require an update to reflect additional information obtained.

This report is not a comprehensive site characterization and should not be construed as such. The findings as presented in this report are predicated on the results of the limited sampling and laboratory testing performed. In addition, the information obtained is not intended to address potential impacts related to sources other than those specified herein. Therefore, the report should be deemed conclusive with respect to only the information obtained. We make no warranty, express or implied, with respect to the content of this report or any subsequent reports, correspondence or consultation. Geocon strived to perform the services summarized herein in accordance with the local standard of care in the geographic region at the time the services were rendered.

The contents of this report reflect the views of the author who is responsible for the facts and accuracy of the data presented herein. The contents do not necessarily reflect the official views or policies of the State of California or the Federal Highway Administration. This report does not constitute a standard, specification, or regulation.



GEOCON
CONSULTANTS, INC.
3160 GOLD VALLEY DR – SUITE 800 – RANCHO CORDOVA, CA 95742
PHONE 916.852.9118 – FAX 916.852.9132

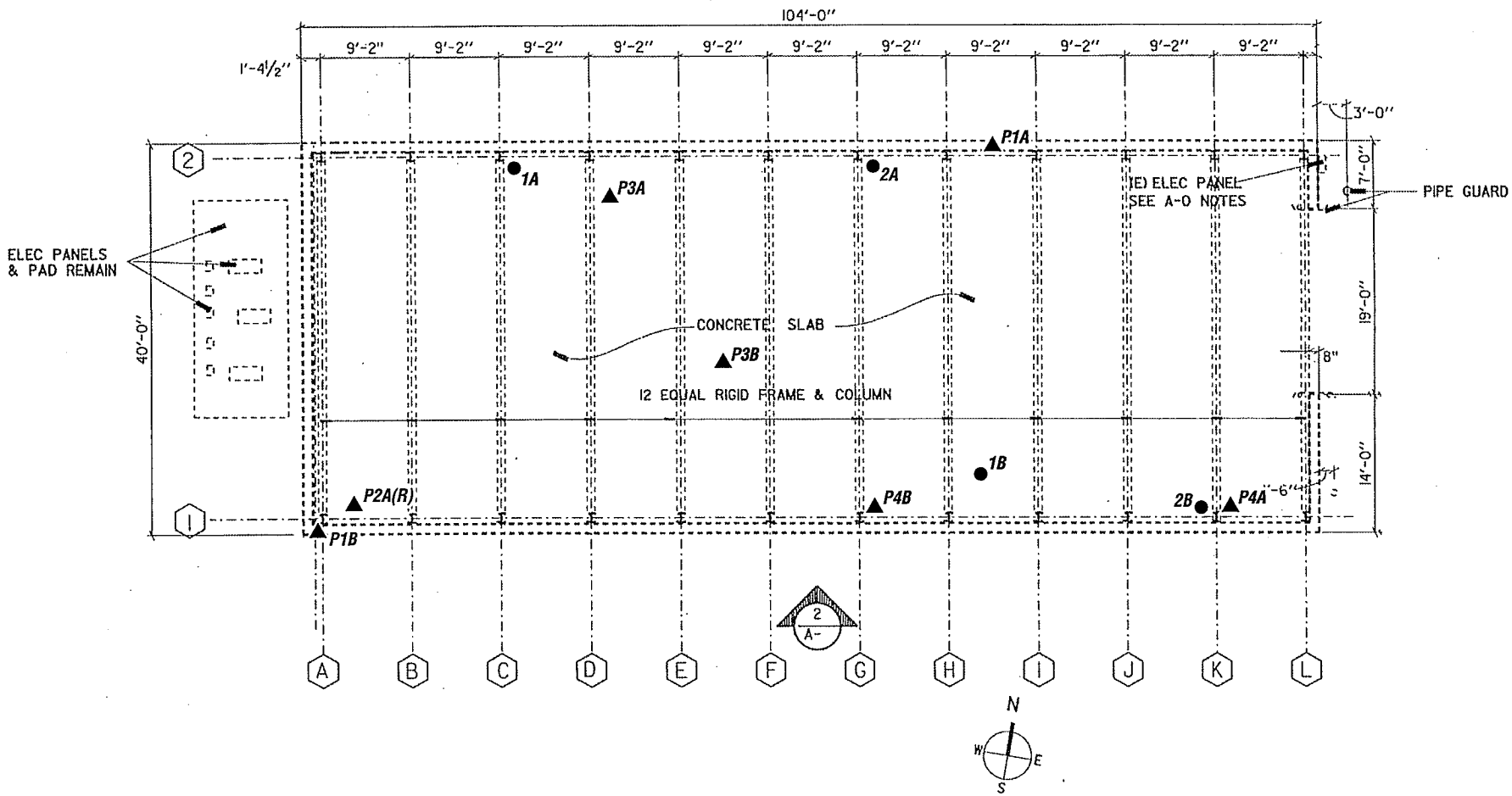
Castle Peak Sandhouse

03-NEV-80 PM R5.1/R5.2
Nevada County, California

GEOCON Proj. No. S9300-06-146
Task Order No. 146,
E-FIS 03 0000 0727 1 (EA 03-4E8801)
Caltrans Contract 03A1368

VICINITY MAP

November 2010 | Figure 1



LEGEND:

- ● Approximate Asbestos Sample Location
- ▲ Approximate Paint Sample Location
- *(R)* Roof

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CONSULTANTS, INC.
3160 GOLD VALLEY DR – SUITE 800 – RANCHO CORDOVA, CA 95742
PHONE 916.852.9118 – FAX 916.852.9132

Castle Peak Sandhouse

03-NEV-80 PM R5.1/R5.2
Nevada County, California

SITE PLAN

GEOCON Proj. No. S9300-06-146
Task Order No. 146,
E-FIS 03 0000 0727 1 (EA 03-4E8801)
Caltrans Contract 03A1368

November 2010 | Figure 2

Photo 1 – Castle Peak Sandhouse at Interstate 80, Post Mile 5.1/5.2 (eastbound) in Nevada County, California

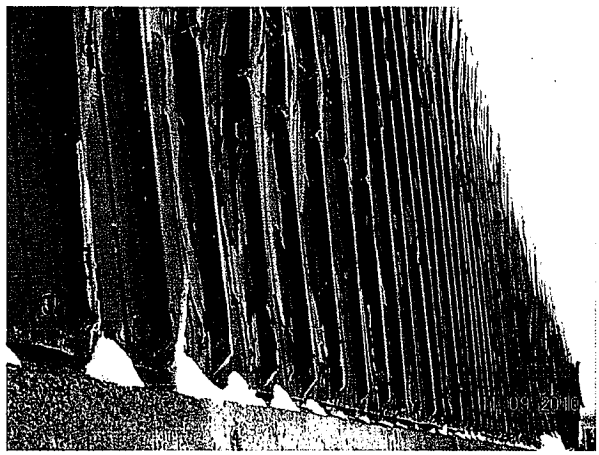

Photo 2 – Deteriorated paint on sandhouse exterior

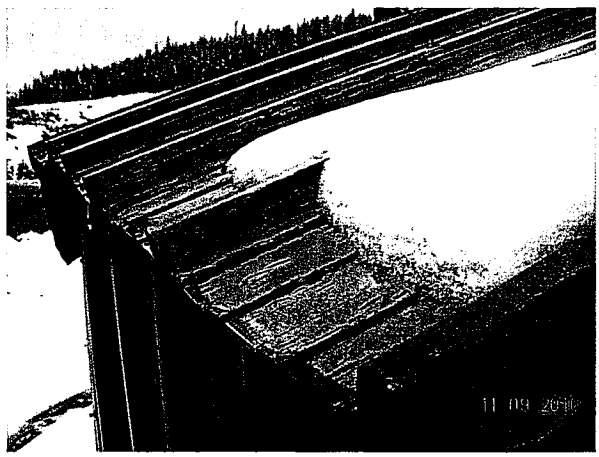

Photo 3 – Sandhouse roof

GEOCON
CONSULTANTS, INC.
3160 GOLD VALLEY DR – SUITE 800 – RANCHO CORDOVA, CA 95742
PHONE 916.852.9118 – FAX 916.852.9132

PHOTOGRAPHS 1, 2, & 3		
Caltrans Contract 03A1368, Task Order No.146 E-FIS 03 0000 0727 1, 03-NEV-80 PM R5.1/R5.2		
S9300-06-146	(EA 03-4E8801)	November 2010

Photo 4 – Sandhouse interior

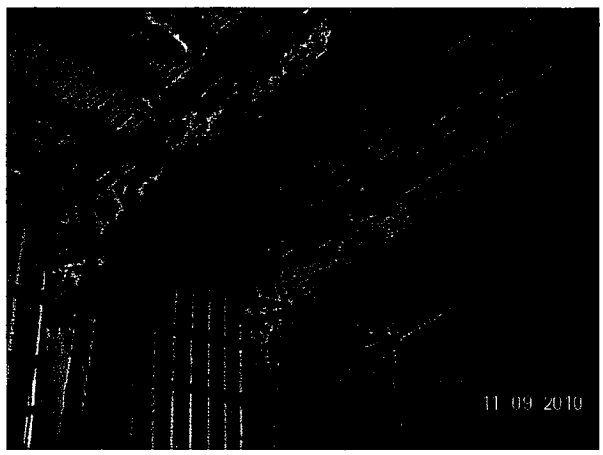

Photo 5 – Deteriorated white paint on sandhouse upper columns, walls, and ceiling

Photo 6 – Deteriorated black paint on sandhouse lower columns

GEOCON
CONSULTANTS, INC.
3160 GOLD VALLEY DR – SUITE 800 – RANCHO CORDOVA, CA 95742
PHONE 916.852.9118 – FAX 916.852.9132

PHOTOGRAPHS 4, 5, & 6		
Caltrans Contract 03A1368, Task Order No.146 E-FIS 03 0000 0727 1, 03-NEV-80 PM R5.1/R5.2		
S9300-06-146	(EA 03-4E8801)	November 2010

TABLE 1
SUMMARY OF ASBESTOS ANALYTICAL RESULTS
CASTLE PEAK SANDHOUSE
CALTRANS CONTRACT 03A1368, TASK ORDER NO.146, E-FIS 03 0000 0727 1 (EA 03-4E8801), 03-NEV-80 PM R5.1/R5.2
NEVADA COUNTY, CALIFORNIA

Polarized Light Microscopy (PLM) - EPA Test Method 600/R-93/116

Sample No.	Description of Material	Approximate Quantity	Friable	Site Photo	Asbestos Content
1A	Textured interior paint (white)	NA	NA	4 and 5	ND
1B					ND
2A	Textured interior paint (black)	NA	NA	6	ND
2B					ND

Notes:

NA = Not applicable (no asbestos detected)

ND = Not detected

TABLE 2
SUMMARY OF PAINT ANALYTICAL RESULTS - TOTAL AND SOLUBLE LEAD
CASTLE PEAK SANDHOUSE
CALTRANS CONTRACT 03A1368, TASK ORDER NO.146, E-FIS 03 0000 0727 1 (EA 03-4E8801), 03-NEV-80 PM R5.1/R5.2
NEVADA COUNTY, CALIFORNIA

Paint Sample No.	Paint Description	Approximate Quantity Peeling/Flaking	Site Photos	Total Lead (mg/kg)	WET Lead (mg/l)	TCLP Lead (mg/l)
P1A	Brown exterior paint	750 square feet	1 and 2	660	<0.25	---
P1B				91		
P2A	Green roofing paint	Unable to observe roof (snow coverage)	3	10,000	---	<4.5
P3A	White interior paint	2,500 square feet	4 and 5	15	---	---
P3B				12		
P4A	Black interior paint	500 square feet	6	13	---	---
P4B				13		

Notes:

mg/kg = milligrams per kilogram
WET = Waste Extraction Test (EPA Test Method 7420)
mg/l = milligrams per liter
TCLP = Toxicity Characteristic Leaching Procedure (EPA Test Method 1311)
--- = Not analyzed
< = Not detected at or above the indicated laboratory reporting limit

APPENDIX A

091009933

EMSL ANALYTICAL, INC.
LABORATORY • PRODUCTS • TRAINING

Asbestos Chain of Custody

EMSL Order Number *(Lab Use Only)*: 091009933

EMSL ANALYTICAL, INC.
2235 POLVOROSA DR., STE. 230
SAN LEANDRO, CA 94577
PHONE: (510) 895-3675
FAX: (510) 895-3680

Company: GEOCON	EMSL-Bill to: ☒ Same ☐ Different If Bill to is Different note instructions in Comments**
Street: 6671 BRISA ST	*Third Party Billing requires written authorization from third party*
City: LIVERMORE State/Province: CA	Zip/Postal Code: 94550 Country: USA
Report To (Name): D. WATTS	Fax #:
Telephone #: 925-371-5900	Email Address: 925-371-5915
Project Name/Number: 39300-06-146	
Please Provide Results: ☐ Fax ☐ Email	Purchase Order: U.S. State Samples Taken:

Turnaround Time (TAT) Options* – Please Check

☐ 3 Hour ☐ 6 Hour ☐ 24 Hour ☐ 48 Hour ☐ 72 Hour ☐ 96 Hour ☒ 1 Week ☐ 2 Week

**For TEM Air 3 hours/6 hours, please call ahead to schedule.*There is a premium charge for 3 Hour TEM AHERA or EPA Level II TAT. You will be asked to sign an authorization form for this service. Analysis completed in accordance with EMSL's Terms and Conditions located in the Analytical Price Guide.*

PCM - Air
- ☐ NIOSH 7400
- ☐ w/ OSHA 8hr. TWA

PLM - Bulk (reporting limit)
- ☒ PLM EPA 600/R-93/116 (<1%)
- ☐ PLM EPA NOB (<1%)

Point Count
- ☐ 400 (<0.25%) ☐ 1000 (<0.1%)

Point Count w/Gravimetric
- ☐ 400 (<0.25%) ☐ 1000 (<0.1%)
- ☐ NYS 198.1 (friable in NY)
- ☐ NYS 198.6 NOB (non-friable-NY)
- ☐ NIOSH 9002 (<1%)

TEM – Air ☐ **4-4.5hr TAT** (AHERA only)
- ☐ AHERA 40 CFR, Part 763
- ☐ NIOSH 7402
- ☐ EPA Level II
- ☐ ISO 10312

TEM - Bulk
- ☐ TEM EPA NOB
- ☐ NYS NOB 198.4 (non-friable-NY)
- ☐ Chatfield SOP
- ☐ TEM Mass Analysis-EPA 600 sec. 2.5

TEM – Water: EPA 100.2
- Fibers >10µm ☐ Waste ☐ Drinking
- All Fiber Sizes ☐ Waste ☐ Drinking

TEM- Dust
- ☐ Microvac - ASTM D 5755
- ☐ Wipe - ASTM D6480
- ☐ Carpet Sonication (EPA 600/J-93/167)

Soil/Rock/Vermiculite
- ☐ PLM CARB 435 - A (0.25% sensitivity)
- ☐ PLM CARB 435 - B (0.1% sensitivity)
- ☐ TEM CARB 435 - B (0.1% sensitivity)
- ☐ TEM CARB 435 - C (0.01% sensitivity)
- ☐ EPA Protocol (Semi-Quantitative)
- ☐ EPA Protocol (Quantitative)

Other:
- ☐

☐ **Check For Positive Stop – Clearly Identify Homogenous Group**

Samplers Name: W. WATTS, D. WATTS **Samplers Signature:** W. WATTS

Sample #	Sample Description	Volume/Area (Air) HA # (Bulk)	Date/Time Sampled
1A	TEXTURED WHITE PAINT	NA	11/9/10
1B	〃	〃	〃
2A	BLACK	〃	〃
2B	〃	〃	〃

Client Sample # (s): **Total # of Samples:** 4

Relinquished (Client): W. WATTS **Date:** 11/9/10 **Time:** 2106

Received (Lab): [signature] **Date:** 11/11/10 **Time:** 10:00 hrs

Comments/Special Instructions:

EMSL Analytical, Inc
2235 Polvorosa Ave , Suite 230, San Leandro, CA 94577
Phone: (510) 895-3675 Fax: (510) 895-3680 Email: milpitaslab@emsl.com

Attn: **Dave Watts**
Geocon Consultants
6671 Brisa Street
Livermore, CA 94550

Fax: (925) 371-5915 Phone: (925) 371-5900
Project: **9300-06-146**

Customer ID: GECN21
Customer PO: 9300-06-146
Received: 11/11/10 10:00 AM
EMSL Order: 091009933

EMSL Proj:
Analysis Date: 11/18/2010

Test Report: Asbestos Analysis of Bulk Materials via EPA 600/R-93/116 Method using Polarized Light Microscopy

			Non-Asbestos		Asbestos
Sample	**Description**	**Appearance**	**% Fibrous**	**% Non-Fibrous**	**% Type**
1A-Textured Paint *091009933-0001*		White Non-Fibrous Homogeneous		100% Non-fibrous (other)	**None Detected**
1B-Textured Paint *091009933-0002*		White Non-Fibrous Homogeneous		100% Non-fibrous (other)	**None Detected**
2A-Textured Paint *091009933-0003*		Black Non-Fibrous Homogeneous		100% Non-fibrous (other)	**None Detected**
2B-Textured Paint *091009933-0004*		Black Non-Fibrous Homogeneous		100% Non-fibrous (other)	**None Detected**

Initial report from 11/18/2010 08:29:54

Analyst(s)

Jorge Leon (4)

Baojia Ke, Laboratory Manager
or other approved signatory

Due to magnification limitations inherent in PLM, asbestos fibers in dimensions below the resolution capability of PLM may not be detected. Samples reported as <1% or none detected may require additional testing by TEM to confirm asbestos quantities. The above test report relates only to the items tested and may not be reproduced in any form without the express written approval of EMSL Analytical, Inc. EMSL's liability is limited to the cost of analysis. EMSL bears no responsibility for sample collection activities or analytical method limitations. Interpretation and use of test results are the responsibility of the client.Samples received in good condition unless otherwise noted.
Samples analyzed by EMSL Analytical, Inc 2235 Polvorosa Ave , Suite 230, San Leandro CA NVLAP Lab Code 101048-3, MA AA000201, WA C2007

THIS IS THE LAST PAGE OF THE REPORT.

November 17, 2010

Dave Watts
Geocon Consultants, Inc.
6671 Brisa Street
Livermore, CA 94550
TEL: (925) 371-5900
FAX: (925) 371-5915

ELAP No.: 1838
NELAP No.: 02107CA
CSDLAC No.: 10196

Workorder No.: 114696

RE: TO-146, S9300-06-146

Attention: Dave Watts

Enclosed are the results for sample(s) received on November 11, 2010 by Advanced Technology Laboratories . The sample(s) are tested for the parameters as indicated in the enclosed chain of custody in accordance with the applicable laboratory certifications.

Thank you for the opportunity to service the needs of your company.

Please feel free to call me at (562)989-4045 if I can be of further assistance to your company.

Sincerely,

Eddie F. Rodriguez
Laboratory Director

The cover letter is an integral part of this analytical report. This Laboratory Report cannot be reproduced in part or in its entirety without written permission from the client and Advanced Technology Laboratories.

CLIENT: Geocon Consultants, Inc. **Lab Order:** 114696
Project: TO-146, S9300-06-146

Lab ID: 114696-001 **Collection Date:** 11/9/2010
Client Sample ID: P1A **Matrix:** PAINT

Analyses	Result	PQL	Qual	Units	DF	Date Analyzed
ICP METALS						
	EPA 3050B			**EPA 6010B**		
RunID: ICP8_101116A	QC Batch: 68162			PrepDate: 11/15/2010		Analyst: **SRB**
Lead	660	38		mg/Kg	1	11/16/2010 12:07 PM

Lab ID: 114696-002 **Collection Date:** 11/9/2010
Client Sample ID: P1B **Matrix:** PAINT

Analyses	Result	PQL	Qual	Units	DF	Date Analyzed
ICP METALS						
	EPA 3050B			**EPA 6010B**		
RunID: ICP8_101116A	QC Batch: 68162			PrepDate: 11/15/2010		Analyst: **SRB**
Lead	91	4.1		mg/Kg	1	11/16/2010 12:10 PM

Lab ID: 114696-003 **Collection Date:** 11/9/2010
Client Sample ID: P2A **Matrix:** PAINT

Analyses	Result	PQL	Qual	Units	DF	Date Analyzed
ICP METALS						
	EPA 3050B			**EPA 6010B**		
RunID: ICP8_101116A	QC Batch: 68162			PrepDate: 11/15/2010		Analyst: **SRB**
Lead	10000	35		mg/Kg	1	11/16/2010 12:14 PM

Lab ID: 114696-004 **Collection Date:** 11/9/2010
Client Sample ID: P3A **Matrix:** PAINT

Analyses	Result	PQL	Qual	Units	DF	Date Analyzed
ICP METALS						
	EPA 3050B			**EPA 6010B**		
RunID: ICP8_101116A	QC Batch: 68162			PrepDate: 11/15/2010		Analyst: **SRB**
Lead	15	2.0		mg/Kg	1	11/16/2010 12:17 PM

Qualifiers:
- B Analyte detected in the associated Method Blank
- H Holding times for preparation or analysis exceeded
- S Spike/Surrogate outside of limits due to matrix interference
- DO Surrogate Diluted Out
- E Value above quantitation range
- ND Not Detected at the Reporting Limit

Results are wet unless otherwise specified

CLIENT: Geocon Consultants, Inc. **Lab Order:** 114696
Project: TO-146, S9300-06-146

Lab ID: 114696-005 **Collection Date:** 11/9/2010
Client Sample ID: P3B **Matrix:** PAINT

Analyses	Result	PQL	Qual	Units	DF	Date Analyzed
ICP METALS						
	EPA 3050B			**EPA 6010B**		
RunID: ICP8_101116A	QC Batch: 68162			PrepDate: 11/15/2010		Analyst: **SRB**
Lead	12	2.0		mg/Kg	1	11/16/2010 12:20 PM

Lab ID: 114696-006 **Collection Date:** 11/9/2010
Client Sample ID: P4A **Matrix:** PAINT

Analyses	Result	PQL	Qual	Units	DF	Date Analyzed
ICP METALS						
	EPA 3050B			**EPA 6010B**		
RunID: ICP8_101116A	QC Batch: 68162			PrepDate: 11/15/2010		Analyst: **SRB**
Lead	13	2.0		mg/Kg	1	11/16/2010 12:24 PM

Lab ID: 114696-007 **Collection Date:** 11/9/2010
Client Sample ID: P4B **Matrix:** PAINT

Analyses	Result	PQL	Qual	Units	DF	Date Analyzed
ICP METALS						
	EPA 3050B			**EPA 6010B**		
RunID: ICP8_101116A	QC Batch: 68162			PrepDate: 11/15/2010		Analyst: **SRB**
Lead	13	2.0		mg/Kg	1	11/16/2010 12:34 PM

Qualifiers:
- B Analyte detected in the associated Method Blank
- H Holding times for preparation or analysis exceeded
- S Spike/Surrogate outside of limits due to matrix interference
- DO Surrogate Diluted Out
- E Value above quantitation range
- ND Not Detected at the Reporting Limit

Results are wet unless otherwise specified

CLIENT: Geocon Consultants, Inc.
Work Order: 114696
Project: TO-146, S9300-06-146

ANALYTICAL QC SUMMARY REPORT

TestCode: 6010_S

Sample ID: **MB-68162**	SampType: **MBLK**	TestCode: **6010_S**	Units: **mg/Kg**	Prep Date: **11/15/2010**	RunNo: **126834**
Client ID: **PBS**	Batch ID: **68162**	TestNo: **EPA 6010B**	**EPA 3050B**	Analysis Date: **11/16/2010**	SeqNo: **2046001**

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Lead	ND	1.0									

Sample ID: **LCS-68162**	SampType: **LCS**	TestCode: **6010_S**	Units: **mg/Kg**	Prep Date: **11/15/2010**	RunNo: **126834**
Client ID: **LCSS**	Batch ID: **68162**	TestNo: **EPA 6010B**	**EPA 3050B**	Analysis Date: **11/16/2010**	SeqNo: **2046002**

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Lead	50.085	1.0	50.00	0	100	80	120				

Sample ID: **114726-010A-DUP**	SampType: **DUP**	TestCode: **6010_S**	Units: **mg/Kg**	Prep Date: **11/15/2010**	RunNo: **126834**
Client ID: **ZZZZZZ**	Batch ID: **68162**	TestNo: **EPA 6010B**	**EPA 3050B**	Analysis Date: **11/16/2010**	SeqNo: **2046005**

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Lead	7.411	1.0						7.766	4.69	20	

Sample ID: **114726-010A-MS**	SampType: **MS**	TestCode: **6010_S**	Units: **mg/Kg**	Prep Date: **11/15/2010**	RunNo: **126834**
Client ID: **ZZZZZZ**	Batch ID: **68162**	TestNo: **EPA 6010B**	**EPA 3050B**	Analysis Date: **11/16/2010**	SeqNo: **2046006**

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Lead	105.601	1.0	125.0	7.766	78.3	34	126				

Sample ID: **114726-010A-MSD**	SampType: **MSD**	TestCode: **6010_S**	Units: **mg/Kg**	Prep Date: **11/15/2010**	RunNo: **126834**
Client ID: **ZZZZZZ**	Batch ID: **68162**	TestNo: **EPA 6010B**	**EPA 3050B**	Analysis Date: **11/16/2010**	SeqNo: **2046007**

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Lead	105.721	1.0	125.0	7.766	78.4	34	126	105.6	0.113	20	

Qualifiers:

- B Analyte detected in the associated Method Blank
- ND Not Detected at the Reporting Limit
- DO Surrogate Diluted Out
- E Value above quantitation range
- R RPD outside accepted recovery limits
  Calculations are based on raw values
- H Holding times for preparation or analysis exceeded
- S Spike/Surrogate outside of limits due to matrix interference

CHAIN OF CUS)DY RECORD

Pg 1 of 1

Advanced Technology Laboratories
3275 Walnut Avenue
Signal Hill, CA 90755
(562) 989-4045 • Fax (562) 989-4040

FOR LABORATORY USE ONLY:

P.O.#: _____

Logged By: _____ Date: 11/11/10

Method of Transport: Client ☐ ATL ☐ CA OverN ☐ FEDEX ☐ Other: UPS

Sample Condition Upon Receipt
1. CHILLED Y☐ N☑ 4. SEALED Y☐ N☐
2. HEADSPACE (VOA) Y☐ N☐ 5. # OF SPLS MATCH COC Y☑ N☐
3. CONTAINER INTACT Y☑ N☐ 6. PRESERVED Y☐ N☐

Client: GEOCON CONSULTANTS, INC.
Attn: D. WATTS
Address: 6671 Brisa Street
City Livermore State CA Zip Code 94550
TEL: (925) 371-5900
FAX: (925) 371-5915

Project Name: TO-146 Project #: 9300-06-146 Sampler: (Printed Name) D. WATTS (Signature)

Relinquished by: (Signature and Printed Name)	Date: 9 NOV 2010	Time: 2100	Received by: (Signature and Printed Name) GSO	Date: 9 NOV 2010	Time: 2100
Relinquished by: (Signature and Printed Name)	Date:	Time:	Received by: (Signature and Printed Name)	Date: 11/11/10	Time: 940
Relinquished by: (Signature and Printed Name)	Date:	Time:	Received by: (Signature and Printed Name)	Date:	Time:

I hereby authorize ATL to perform the work indicated below:
Project Mgr /~~Submitter~~: D. WATTS 9 NOV 2010 (Print Name / Date)
(Signature)

Send Report To:
Attn: _____
Co: SAME AS ABOVE
Address _____
City _____ State _____ Zip _____

Bill To:
Attn: _____
Co: SAME AS ABOVE
Address _____
City _____ State _____ Zip _____

Special Instructions/Comments:
Total Pb - Paint Particulate Soluble Requests)

Sample/Records - Archival & Disposal
Unless otherwise requested by client, all samples will be disposed 45 days after receipt and records will be disposed 1 year after submittal of final report.

Storage Fees (applies when storage is requested):
- Sample : $2.00 / sample / mo (after 45 days)
- Records : $1.00 / ATL workorder / mo (after 1 year)

Circle or Add Analysis(es) Requested

ITEM	LAB USE ONLY: Batch #: / Lab No.	Sample Description: Sample I.D. / Location	Date	Time	8081A (Pesticides)	8082 (PCB)	8260B (Volatiles)	8270C (BNA)	6010B (Total Metal) - Pb	8015B (GRO) / BTEX	8015B (DRO)	8021 (BTEX)	TITLE 22 / CAM 17 (6010 / 7000)	SOIL	WATER	GROUND WATER	WASTEWATER	PAINT	TAT	Container(s) #	Container(s) Type	PRESERVATION	REMARKS
	1146516-007	P1A	11/9/10	Pm				X									X		5-Day	1	Bg P		
	2	P1B																					
	3	P2A																					
	4	P3A																					
	5	P3B																					
	6	P4A																					
	7	P4B																					

QA/QC: RTNE ☐ CT ☑ SWRCB ☐ Logcode ____ OTHER ____

- TAT starts 8 a.m. following day if samples received after 3 p.m.

TAT: A= Overnight ≤ 24 hr B= Emergency Next workday C= Critical 2 Workdays D= Urgent 3 Workdays E= Routine 7 Workdays

Container Types: T=Tube V=VOA L=Liter P=Pint J=Jar B=Tedlar G=Glass P=Plastic M=Metal

Preservatives: H=HCl N=HNO_3 S=H_2SO_4 C=4°C Z=$Zn(AC)_2$ O=NaOH T=$Na_2S_2O_3$

DISTRIBUTION: White with report Yellow to folder Pink to submitter

November 24, 2010

Dave Watts
Geocon Consultants, Inc.
6671 Brisa Street
Livermore, CA 94550
TEL: (925) 371-5900
FAX: (925) 371-5915

ELAP No.: 1838
NELAP No.: 02107CA
CSDLAC No.: 10196

Workorder No.: 114696

RE: TO-146, S9300-06-146

Attention: Dave Watts

Enclosed are the results for sample(s) received on November 11, 2010 by Advanced Technology Laboratories . The sample(s) are tested for the parameters as indicated in the enclosed chain of custody in accordance with the applicable laboratory certifications.

This is an addendum report. Please incorporate with documentation previously submitted.

Thank you for the opportunity to service the needs of your company.

Please feel free to call me at (562)989-4045 if I can be of further assistance to your company.

Sincerely,

Eddie F. Rodriguez
Laboratory Director

The cover letter is an integral part of this analytical report. This Laboratory Report cannot be reproduced in part or in its entirety without written permission from the client and Advanced Technology Laboratories.

Advanced Technology Laboratories
3275 Walnut Avenue Signal Hill, CA 90755 Tel: 562 989-4045 Fax: 562 989-4040

CLIENT: Geocon Consultants, Inc. **Lab Order:** 114696
Project: TO-146, S9300-06-146

Lab ID: 114696-003 **Collection Date:** 11/9/2010
Client Sample ID: P2A **Matrix:** PAINT

Analyses	Result	PQL	Qual	Units	DF	Date Analyzed
LEAD BY ATOMIC ABSORPTION (TCLP)						
	EPA3010A			**EPA 1311/ 7420**		
RunID: AA2_101124B	QC Batch: 68400			PrepDate:	11/24/2010	Analyst: **IL**
Lead	ND	4.5		mg/L	1	11/24/2010 01:01 PM

Lab ID: 114696-009 **Collection Date:** 11/9/2010
Client Sample ID: Composite P1A, P1B **Matrix:** PAINT

Analyses	Result	PQL	Qual	Units	DF	Date Analyzed
LEAD BY ATOMIC ABSORPTION (STLC)						
	WET			**WET/ EPA 7420**		
RunID: AA2_101124A	QC Batch: 68312			PrepDate:	11/22/2010	Analyst: **IL**
Lead	ND	0.25		mg/L	1	11/24/2010 11:33 AM

Qualifiers:
- B Analyte detected in the associated Method Blank
- H Holding times for preparation or analysis exceeded
- S Spike/Surrogate outside of limits due to matrix interference
- DO Surrogate Diluted Out
- E Value above quantitation range
- ND Not Detected at the Reporting Limit

Results are wet unless otherwise specified

CLIENT: Geocon Consultants, Inc.
Work Order: 114696
Project: TO-146, S9300-06-146

ANALYTICAL QC SUMMARY REPORT

TestCode: 7420_ST

Sample ID: **MB-68312**	SampType: **MBLK**	TestCode: **7420_ST**	Units: **mg/L**	Prep Date: **11/22/2010**	RunNo: **127090**
Client ID: **PBS**	Batch ID: **68312**	TestNo: **WET/ EPA 74 WET**		Analysis Date: **11/24/2010**	SeqNo: **2050904**

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Lead	ND	0.25									

Sample ID: **LCS-68312**	SampType: **LCS**	TestCode: **7420_ST**	Units: **mg/L**	Prep Date: **11/22/2010**	RunNo: **127090**
Client ID: **LCSS**	Batch ID: **68312**	TestNo: **WET/ EPA 74 WET**		Analysis Date: **11/24/2010**	SeqNo: **2050905**

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Lead	5.045	0.25	5.000	0	101	80	120				

Sample ID: **114834-002A-DUP**	SampType: **DUP**	TestCode: **7420_ST**	Units: **mg/L**	Prep Date: **11/22/2010**	RunNo: **127090**
Client ID: **ZZZZZZ**	Batch ID: **68312**	TestNo: **WET/ EPA 74 WET**		Analysis Date: **11/24/2010**	SeqNo: **2050908**

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Lead	0.365	0.25						0.3932	7.40	20	

Sample ID: **114834-002A-MS**	SampType: **MS**	TestCode: **7420_ST**	Units: **mg/L**	Prep Date: **11/22/2010**	RunNo: **127090**
Client ID: **ZZZZZZ**	Batch ID: **68312**	TestNo: **WET/ EPA 74 WET**		Analysis Date: **11/24/2010**	SeqNo: **2050909**

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Lead	4.993	0.25	5.000	0.3932	92.0	80	120				

Sample ID: **114834-002A-MSD**	SampType: **MSD**	TestCode: **7420_ST**	Units: **mg/L**	Prep Date: **11/22/2010**	RunNo: **127090**
Client ID: **ZZZZZZ**	Batch ID: **68312**	TestNo: **WET/ EPA 74 WET**		Analysis Date: **11/24/2010**	SeqNo: **2050910**

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Lead	5.000	0.25	5.000	0.3932	92.1	80	120	4.993	0.131	20	

Qualifiers:

- B Analyte detected in the associated Method Blank
- ND Not Detected at the Reporting Limit
- DO Surrogate Diluted Out
- E Value above quantitation range
- R RPD outside accepted recovery limits
- Calculations are based on raw values
- H Holding times for preparation or analysis exceeded
- S Spike/Surrogate outside of limits due to matrix interference

CLIENT: Geocon Consultants, Inc.
Work Order: 114696
Project: TO-146, S9300-06-146

ANALYTICAL QC SUMMARY REPORT

TestCode: 7420_TC

Sample ID: MB-68400	SampType: MBLK	TestCode: 7420_TC	Units: mg/L	Prep Date: 11/24/2010	RunNo: 127092
Client ID: PBS	Batch ID: 68400	TestNo: EPA 1311/ 74	EPA3010A	Analysis Date: 11/24/2010	SeqNo: 2050937

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Lead	ND	0.25									

Sample ID: MB-68325A TCLP	SampType: MBLK	TestCode: 7420_TC	Units: mg/L	Prep Date: 11/24/2010	RunNo: 127092
Client ID: PBS	Batch ID: 68400	TestNo: EPA 1311/ 74	EPA3010A	Analysis Date: 11/24/2010	SeqNo: 2050938

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Lead	ND	0.25									

Sample ID: LCS-68400	SampType: LCS	TestCode: 7420_TC	Units: mg/L	Prep Date: 11/24/2010	RunNo: 127092
Client ID: LCSS	Batch ID: 68400	TestNo: EPA 1311/ 74	EPA3010A	Analysis Date: 11/24/2010	SeqNo: 2050939

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Lead	0.910	0.25	1.000	0	91.0	80	120				

Sample ID: 114713-004A-DUP	SampType: DUP	TestCode: 7420_TC	Units: mg/L	Prep Date: 11/24/2010	RunNo: 127092
Client ID: ZZZZZZ	Batch ID: 68400	TestNo: EPA 1311/ 74	EPA3010A	Analysis Date: 11/24/2010	SeqNo: 2050942

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Lead	ND	0.25						0	0	20	

Sample ID: 114713-004A-MS	SampType: MS	TestCode: 7420_TC	Units: mg/L	Prep Date: 11/24/2010	RunNo: 127092
Client ID: ZZZZZZ	Batch ID: 68400	TestNo: EPA 1311/ 74	EPA3010A	Analysis Date: 11/24/2010	SeqNo: 2050943

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Lead	2.866	0.25	2.500	0	115	70	130				

Qualifiers:

- B Analyte detected in the associated Method Blank
- ND Not Detected at the Reporting Limit
- DO Surrogate Diluted Out
- E Value above quantitation range
- R RPD outside accepted recovery limits
- Calculations are based on raw values
- H Holding times for preparation or analysis exceeded
- S Spike/Surrogate outside of limits due to matrix interference

CLIENT: Geocon Consultants, Inc.
Work Order: 114696
Project: TO-146, S9300-06-146

ANALYTICAL QC SUMMARY REPORT

TestCode: 7420_TC

Sample ID: **114713-004A-MSD**	SampType: **MSD**	TestCode: **7420_TC**	Units: **mg/L**	Prep Date: **11/24/2010**	RunNo: **127092**
Client ID: **ZZZZZZ**	Batch ID: **68400**	TestNo: **EPA 1311/ 74 EPA3010A**		Analysis Date: **11/24/2010**	SeqNo: **2050944**

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Lead	3.002	0.25	2.500	0	120	70	130	2.866	4.64	20	

Qualifiers:

- B Analyte detected in the associated Method Blank
- ND Not Detected at the Reporting Limit
- DO Surrogate Diluted Out
- E Value above quantitation range
- R RPD outside accepted recovery limits
- Calculations are based on raw values
- H Holding times for preparation or analysis exceeded
- S Spike/Surrogate outside of limits due to matrix interference

Advanced Technology Laboratories *3275 Walnut Avenue, Signal Hill, CA 90755* *Tel: 562. 989.4045* *Fax: 562.989.4040*

Diane Galvan

From: watts@geoconinc.com
Sent: Wednesday, November 17, 2010 10:00 PM
To: Diane Galvan
Subject: Re: Results/EDD - TO-146 (114696)

please composite P1A and P1B and run WET (run a TCLP if it fails WET) please run a TCLP on P2A see original CofC for TAT