

INFORMATION HANDOUT

For Contract No. 01-0E2304

At 01-HUM-101-R48.7

Identified by

Project ID 0114000026

PERMITS

WATER QUALITY

PLAC - California Regional Water Quality Control Board, North Coast Region

Notice of Coverage, General Waste Discharge Requirements for Discharges Associated with Transportation Structure Repainting Activities Order No. R1-2003-0041, dated April 20, 2015

CRWQCB North Coast Region Order No. R1-2003-0041 General Waste Discharges Associated with Transportation Structure Repainting Activities

CRWQCB North Coast Region Monitoring and Reporting Program No. R1-2003-0041 for Discharges Associated with Transportation Structure Repainting Activities

MATERIALS INFORMATION

Asbestos and Paint (Lead and Hexavalent Chromium) Survey Report R. Fleisher Memorial Bridge (04-0014) dated July 29, 2011

North Coast Regional Water Quality Control Board

April 20, 2015

Ms. Allison Kunz
California Department of Transportation
703 B Street
Marysville, CA 95901

Dear Ms. Kunz:

Subject: Notice of Coverage, General Waste Discharge Requirements for Discharges Associated with Transportation Structure Repainting Activities Order No. R1-2003-0041

File: Humboldt County General Order No. R1-2003-0041
WDID No. 1B15037RHUM

On February 6, 2015, on behalf of the California Department of Transportation (Permittee), you submitted a Report of Waste Discharge (ROWD) with a description of the proposed bridge maintenance and painting project known as Eel River Bridge and Overhead (BOH) (Project). The proposed bridge activities have the potential to impact water quality. A project fee of \$11,195 was received by our office on April 15, 2015.

Based on our technical review of the ROWD, the North Coast Regional Water Quality Control Board (Regional Water Board) staff has determined the proposed projects qualify for enrollment under *General Waste Discharge Requirements for Discharges Associated with Transportation Structure Repainting Activities* (WDR Order R1-2003-0041). As of the date of this letter, the Project is covered under WDR Order No R1-2003-0041.

The Eel River BOH's existing paint matrix may consist of lead primer and finish coat paint. Maintenance work that disturbs the existing paint matrix will produce debris containing heavy metals in amounts that could exceed the thresholds established in Titles 8 and 22 of the California Code of Regulations. In addition, any discharge of paint or other debris without a discharge permit from this agency would constitute a violation of the California Water Code. Therefore, this approval is contingent on the Permittee's compliance with its proposal that all debris produced during maintenance and repainting activities shall be fully contained and prohibited from discharging to waters of the state or land areas outside of the containment structure.

The Permittee proposes the following activities be done to the Project bridge:

1. Eel River Bridge and Overhead (BOH), State Route (SR) 101, Post Mile (PM) R48.7
 - a. Add tubular bicycle railing to the existing concrete barrier;
 - b. Install new shear connectors along all four girders to tie the deck to the superstructure;
 - c. Place new concrete on the existing steel girder top flange;
 - d. Spot blast, clean, and paint; and
 - e. Apply a multilayer polymer overlay to the deck surface.

Pursuant to WDR Order R1-2003-0041, the Permittee is required to take on monitoring and reporting responsibilities specified in Monitoring and Reporting Program (MRP) No. R1-2003-0041. Additionally, the Permittee shall complete the project as described in the February 6, 2015 complete ROWD and the Water Pollution Control Plan, which must be submitted 30 days prior to commencement of the project as per section D.2 of WDR Order R1-2003-0041. As a condition of coverage under WDR Order R1-2003-0041, no staging, access, or parking areas may be located within, or immediately adjacent to waters of the state or waters of the United States. All exposed soils must be stabilized using a native seed mix or other method as approved by Regional Water Board staff. Additionally, photographs must be taken during the main events of the project. The events requiring photo documentation are as follows:

1. Installation of BMPs;
2. Spot blast cleaning activities;
3. Repainting activities; and
4. Project completion.

Photo documentation is required for the purpose of verifying compliance with WDR Order R1-2003-004. The photographs shall be submitted to the Regional Water Board within two weeks of the completion of the Project.

Please be aware that WDR Order R1-2003-0041 requires a permit fee be paid annually until the permit is terminated. Permit coverage will remain in place until coverage is terminated by Regional Water Board staff in writing. It is the Permittee's responsibility to request cancellation of the permit coverage as soon as the project is completed.

Please read and fully understand Order No. R1-2003-0041 and MRP Order No. R1-2003-0041. These documents can be found at:

http://www.waterboards.ca.gov/northcoast/board_decisions/adopted_orders/pdf/060403GeneralWDRsRepainting.pdf and

http://www.waterboards.ca.gov/northcoast/board_decisions/adopted_orders/pdf/060403GeneralWDRMR.pdf.

If you have any questions, please contact Devon Jorgenson at (707) 576-2701 or devon.jorgenson@waterboards.ca.gov or Charles Reed at (707) 576-2752 or charles.reed@waterboards.ca.gov.

Sincerely,

Matthias St. John
Executive Officer

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Certified-Return Receipt Requested

California Regional Water Quality Control Board
North Coast Region

ORDER NO. R1-2003-0041

GENERAL WASTE DISCHARGE REQUIREMENTS
FOR DISCHARGES ASSOCIATED WITH TRANSPORTATION STRUCTURE
REPAINTING ACTIVITIES

All Counties

The California Regional Water Quality Control Board, North Coast Region (hereinafter Regional Water Board), finds that:

1. Section 13260(a) of the California Water Code (CWC) requires that any person discharging waste or proposing to discharge waste within any region, other than to a community sewer system, that could affect the quality of the waters of the state, file a Report of Waste Discharge (ROWD).
2. A “transportation structure” (hereinafter “structure”) is defined as a bridge, overhead, underpass, overcrossing, separation, viaduct, tunnel, or tube that when measured parallel to the roadway centerline has a length of more than 20 feet between the faces of the end abutments.
3. Discharges of waste to land associated with structure repainting activities have certain common characteristics, such as similar constituents, concentrations of constituents, and containment and disposal techniques. These types of discharges are appropriately regulated under General Waste Discharge Requirements (General WDRs).
4. These General WDRs are intended to regulate discharges of waste associated with structure repainting activities that may affect waters of the state for which a waiver of WDRs or an individual set of WDRs are not appropriate. Only entities generating waste discharges to land (hereinafter discharger) in amounts that may affect waters of the state shall be eligible for coverage under these General WDRs.
5. Waste produced from structure repainting activities includes: soluble surface contaminants, coatings, lead, rust, oil and grease, mill scale, paint, sharp edges and welds, visible dust, dirt, road film, soaps, wash water, construction debris, spent filters, vacuumed residues, demolition debris, soil, silt, and other organic and earthen material.

6. The existing paint system may contain lead, which requires 100% containment of both the paint debris and other waste material produced from operations. Washwater and any visible dust produced when the paint system is disturbed also shall be 100% contained. All waste material produced from structure repainting activities shall be stored at a designated Hazardous Materials Storage Area.
7. Lead is a toxic heavy metal pollutant and bioaccumulates in animal tissues. The U.S. Environmental Protection Agency's primary maximum contaminant level (MCL) for lead in drinking water is 15 parts per billion (ppb), with the MCL goal of 0 ppb. The U.S. Environmental Protection Agency Health Advisory lists lead as a probable human carcinogen. The Water Quality Control Plan for the North Coast Region states "All waters shall be maintained free of toxic substances in concentrations that are toxic to, or that produce detrimental physiological responses in humans, plant, animal, or aquatic life."
8. Determinations of whether structure repainting activities should be covered by General WDRs, waiver of WDRs, or individual WDRs will be made on a case-by-case basis. In general, however, the Regional Water Board finds that discharges associated with structure repainting activities may affect waters of the state and are appropriate for coverage under General WDRs.
9. The Regional Water Board finds that structure repainting activities have a Threat to Water Quality and Complexity of 2-C as defined in the fee schedule listed in Section 2200 Title 23, California Code of Regulations (CCR).
10. This Order establishes minimum standards for discharges of waste associated with structure repainting activities. In the event of a conflict between the provisions of this Order and the Basin Plan, the more stringent provision prevails and the discharger shall comply with the more stringent standard.
11. The beneficial uses of all receiving waters in the North Coast Region may include some or all of the following:
 - a. municipal and domestic supply (MUN)
 - b. agricultural supply (AGR)
 - c. industrial service supply (IND)
 - d. industrial process (PROC)
 - e. groundwater recharge (GWR)
 - f. freshwater replenishment (FRSH)
 - g. navigation (NAV)
 - h. hydropower generation (POW)
 - i. water contact recreation (REC1)
 - j. noncontact water recreation (REC2)
 - k. commercial and sport fishing (COMM)
 - l. warm freshwater habitat (WARM)
 - m. cold freshwater habitat (COLD)
 - n. preservation of areas of special biological significance (BIOL)

- | | |
|---|---------|
| o. inland saline water habitat | (SAL) |
| p. wildlife habitat | (WILD) |
| q. preservation of rare and endangered species | (RARE) |
| r. marine habitat | (MAR) |
| s. migration of aquatic organisms | (MIGR) |
| t. spawning, reproduction, and/or early development | (SPWN) |
| u. shellfish harvesting | (SHELL) |
| v. estuarine habitat | (EST) |
| w. aquaculture | (AQUA) |
12. The beneficial uses for areal ground waters include:
- a. domestic water supply
 - b. agricultural water supply
 - c. industrial service supply
 - d. industrial process supply
13. This Order does not preempt or supersede the authority of municipalities, flood control agencies, or other local agencies to prohibit, restrict, or control discharges of waste subject to their jurisdiction.
14. The Regional Water Board, acting as the lead agency, has determined that structure repainting activities are categorically exempt from provisions of CEQA as a Class 1, Existing Facility, pursuant to Section 15301, Title 14, CCR. The Categorical Exemption covers new discharges of waste associated with structure repainting activities. New discharges of waste associated with structure repainting activities in compliance with this Order will not result in a significant impact on the environment.
15. This Order is consistent with the provisions of State Water Resources Control Board (State Water Board) Resolution No. 68-16, "Statement of Policy with Respect to Maintaining High Quality of Waters in California." The Order does not allow degradation of water quality.
16. The Regional Water Board has notified potential dischargers and all other known interested parties and agencies of its intent to prescribe WDRs for the discharge and has provided them with an opportunity to submit their written comments and recommendations.
17. The Regional Water Board, in a public meeting, heard and considered all comments pertaining to the proposed discharge.

THEREFORE, IT IS HEREBY ORDERED that dischargers of structure repainting waste, in order to meet the provisions contained in Division 7 of the CWC and regulations adopted thereunder, shall comply with the following:

A. APPLICATION PROCEDURES

1. Dischargers shall seek coverage under these General WDRs by filing: (1) a Report of Waste Discharge (Form 200) or an equivalent document; and (2) an annual fee.¹ The Regional Water Board staff will review the application and will make a preliminary determination of whether coverage under these General WDRs, individual WDRs, or a waiver of WDRs is appropriate.
2. Coverage under these Waste Discharge Requirements shall not take effect until: (1) the discharger's application is determined to be complete, and (2) the discharger has received written notification from the Executive Officer of the Regional Water Board (Executive Officer) stating that coverage under this order is appropriate. The Executive Officer shall not issue this notification upon finding that coverage of the project in question under this Order has caused or will likely cause significant public controversy. For such controversial projects, the determination of whether coverage under this Order is appropriate will be made by the Regional Water Board at a regularly scheduled board meeting.
3. A determination by the Executive Officer that a specific discharge is appropriately covered under these General WDRs creates no vested right to continued future coverage. The Regional Water Board may decide, based on good cause, to rescind coverage of a specific discharge under these General WDRs. Such a discharge may be eligible for coverage under a waiver of WDRs, another set of General WDRs, individual WDRs, and/or a National Pollutant Discharge Elimination System (NPDES) permit. If the Regional Water Board decides to regulate a discharge covered by these General WDRs, a waiver of WDRs, under another set of General WDRs, under individual WDRs and/or an NPDES permit, the applicability of these General WDRs to the discharge is immediately terminated on the date the coverage under the other set of General WDRs takes effect, or on the effective date of the waiver of WDRs, individual WDRs or NPDES permit.

B. DISCHARGE PROHIBITIONS

1. The discharge of any waste not specifically regulated by this Order is prohibited.
2. Creation of a pollution, contamination, or nuisance, as defined by Section 13050 of the California Water Code (CWC), is prohibited.
3. The discharge of waste to land that is not under the control of the discharger is prohibited, except as authorized under **C. SOLIDS DISPOSAL**.

¹ The annual fee for coverage corresponds to a Threat to Water Quality and Complexity of 2-C, as defined in the fee schedule listed in 23 CCR 2200. The annual fee for this category of discharge currently is \$2,025.

4. The discharge of any waste, treated or untreated, to surface waters, surface water drainage courses, or areas where the wastes could pass into surface waters is prohibited.
5. The operation of construction equipment in surface waters is prohibited.
6. The discharge of waste that is not authorized by these General WDRs or other Order or waiver by the Regional Water Board is prohibited.

C. SOLIDS DISPOSAL

1. Solid waste removed from the job site shall be disposed at a legal point of disposal, and in accordance with the provisions of Title 27, Division 2, Subdivision 1, CCR or as waived pursuant to Section 13269 of the CWC.

D. GENERAL PROVISIONS

1. Fuel/Toxic Materials Storage

The storage and use of any fuels, oils or toxic substances at the project location or offsite staging areas shall be managed to prevent discharges of waste. All spills and leaks shall be cleaned up immediately and all contaminated materials shall be disposed at an approved disposal site.

2. Water Pollution Control Plan

The discharger shall submit a Water Pollution Control Plan at least thirty days prior to commencement of the project. The plan shall describe the chronology of construction activities for this project and Best Management Practices to be employed.

3. Waste Disposal

Excess earthen materials, demolition materials and organic material generated during the project shall be disposed at a legal point of disposal and in accordance with provisions of Title 27, Division 2, Subdivision 1, CCR. If a disposal site is to be used that has not been previously approved by a Regional Water Board, the discharger shall obtain approval of the new disposal site at least 30 days prior to initiation of proposed work.

4. Operation and Maintenance

The discharger shall properly operate and maintain all facilities and systems of treatment and control (and related appurtenances) which are installed or used by the discharger to achieve compliance with conditions of this Order. The discharger shall keep in a state of readiness all systems necessary to achieve compliance with the conditions of this Order. All systems, both those in service and in reserve, shall be inspected and maintained on a regular basis. Records shall be kept of the inspections and maintenance and made available to the Regional Water Board.

5. Availability

The discharger shall ensure that all site-operating personnel are familiar with the contents of this Order and shall maintain a copy of this Order at the site.

6. Modification

Prior to any modifications of the discharger's facility which would result in a material change in the quality or quantity of waste treated or discharged, or any material change in the location of discharge, the discharger shall report all pertinent information in writing to the Regional Water Board and obtain confirmation from the Regional Water Board that such modifications do not disqualify the discharger from coverage under these General WDRs. Either confirmation or new WDRs shall be obtained before any modifications are implemented.

7. Waste Containment

The discharger shall have an engineer monitoring the site to ensure the effectiveness of the containment system. The system shall be approved by the site engineer prior to commencement of work by the contractor. The site engineer also shall be responsible for assuring compliance with this Order. The discharger shall establish a liaison contact with Regional Water Board staff for the purpose of assuring that compliance with this Order is maintained. A list of designated liaison personnel, addresses, telephone numbers, and specific area(s) of responsibility shall be submitted one month prior to commencement of the construction.

8. Notification

The Regional Water Board's Executive Officer shall be notified immediately of any failure of the waste containment facilities. Such failure shall be promptly corrected in accordance with the requirements of this Order.

9. Permit Responsibility

This Order does not relieve the discharger from responsibility to obtain other necessary local, state, and federal permits to construct facilities necessary for compliance with this Order, nor does this Order prevent imposition of additional standards, requirements, or conditions by any other regulatory agency.

10. Storm Water

If land disturbance (excluding agricultural activity) is one acre or more, the applicant must apply for a Construction Activities Storm Water Permit prior to commencement of construction. If storm water runoff from any industrial processing area is to be discharged to any surface water, coverage under the National Pollution Discharge Elimination System (NPDES) General Permit No. CAS000001-Discharges Of Storm Water Associated With Industrial Activities Excluding Construction Activities Permit will be required.

11. Inspections

The discharger shall allow the Regional Water Board or an authorized representative, upon presentation of credentials and other documents as may be required by law, to:

- a. enter upon the premises where a regulated facility or activity is located or conducted or where records are required to be kept under the conditions of this Order;
- b. have access to and copy at reasonable times any records required to be kept under the conditions of this Order;
- c. inspect, at reasonable times, any facilities, equipment, practices, or operations regulated or required under this Order; and
- d. sample, photograph, video record, and/or monitor at reasonable times, for the purposes of assuring compliance with this Order or as otherwise authorized by the CWC, any substances or parameters at this location.

12. Periodic Review

The Regional Water Board will review this Order periodically and will revise this Order when necessary.

13. Severability

Provisions of these waste discharge requirements are severable. If any provision of these requirements is found invalid, the remainder of these requirements shall not be affected.

14. Change in Ownership

In the event of any change in control or ownership of land or waste discharge facilities presently owned or controlled by the discharger, the discharger shall notify the succeeding owner or operator of the following items by letter, a copy of which shall be forwarded to the Regional Water Board:

- a. existence of this Order, and
- b. the status of the dischargers' annual fee account

15. Vested Rights

This Order does not convey any property rights of any sort or any exclusive privileges. The requirements prescribed herein do not authorize the commission of any act causing injury to persons or property, nor protect the discharger from his liability under federal, state, or local laws, nor create a vested right for the discharger to continue the waste discharge.

16. Order Termination

After notice and opportunity for a hearing, coverage of an individual discharge under this Order may be terminated or modified for cause, including but not limited to the following:

- a. violation of any term or condition contained in this Order;
- b. obtaining this Order by misrepresentation or failure to disclose all relevant facts;
- c. a change in any condition that requires either a temporary or permanent reduction or elimination of the authorized discharge;
- d. a change in a wastewater treatment system to a configuration that is not eligible for coverage under this Order;
- e. violation of any term or condition contained in this Order;
- f. obtaining this Order by misrepresentation or failure to disclose all relevant facts;
- g. a change in any condition that requires either a temporary or permanent reduction or elimination of the authorized discharge;
- h. a change in the discharge that is not eligible for coverage under this Order.

17. Compliance

The discharger shall comply with all of the conditions of this Order. Any noncompliance with this Order constitutes a violation of the Porter-Cologne Water Quality Control Act and/or Basin Plan and is grounds for an enforcement action.

18. Liability

The Regional Water Board may impose administrative civil liability, may refer a discharger to the State Attorney General to seek civil monetary penalties, may seek injunctive relief, or take other appropriate enforcement action as provided in the California Water Code or federal law for violation of State Water Board or Regional Water Board orders.

19. Monitoring

The discharger shall comply with Contingency Planning and Notification Requirements Order No. 74-151 and with Monitoring and Reporting Program No. R1-2003-0041 and any modifications to these documents as specified by the Regional Water Board Executive Officer. Such documents are attached to this Order and incorporated herein. Chemical analyses shall be conducted at a laboratory certified for such analyses by the State Department of Health Services.

20. Signatory Requirements

- a. All Report of Waste Discharge applications submitted to the Regional Water Board shall be signed by either the chief executive officer of the agency or a senior executive officer having responsibility for the overall operations of a principal geographic unit of the agency.
- b. Reports required by this Order and other information requested by the Regional Water Board shall be signed by either the chief executive officer of the agency or a senior executive officer having responsibility for the overall operations of a principal geographic unit of the agency or may be signed by a duly authorized representative provided:
 - i. the authorization is made in writing by a person described in paragraph (a) of this provision;
 - ii. the authorization specifies either an individual or a position having responsibility for the overall operation of the regulated facility or activity or an individual or position having overall responsibility for environmental matters for the agency; and
 - iii. the written authorization is submitted to the Regional Water Board prior to or together with any reports, information, or applications signed by the authorized representative.
- c. Any person signing a document under paragraph (a) or (b) of this provision shall make the following certification:

“I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the

information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted, is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.”

21. Analyses

Unless otherwise approved by the Regional Water Board’s Executive Officer, all analyses shall be conducted at a laboratory certified for such analyses by the State Department of Health Services. All analyses shall be conducted in accordance with the latest edition of “Guidelines Establishing Test Procedures for Analysis of Pollutants,” promulgated by the U.S. Environmental Protection Agency (U.S. EPA.

22. Record Keeping

The discharger shall retain records of all monitoring information including all calibration and maintenance records, copies of all reports required by this Order, and records of all data used to complete the application for this Order. Records shall be maintained for a minimum of three years from the date of the sample, measurement, or report. This period may be extended during the course of any unresolved litigation regarding this discharge or when requested by the Executive Officer.

23. Record Request

The discharger shall furnish, within a reasonable time, any information the Regional Water Board may request to determine whether cause exists for modifying, revoking and reissuing, or terminating the discharger’s coverage under this Order. The Discharger shall also furnish to the Regional Water Board, upon request, copies of all records required to be kept by this Order.

24. Noncompliance

In the event the discharger is unable to comply with any of the conditions of this Order due to:

- a. breakdown of equipment;
- b. accidents caused by human error or negligence; or
- c. other causes such as acts of nature;

the discharger shall notify the Executive Officer by telephone as soon as he or his agents have knowledge of the incident and confirm this notification in writing within two weeks of the telephone notification. The written notification shall include pertinent information explaining reasons for the noncompliance and shall indicate the steps taken to correct the problem and the dates thereof, and the steps

being taken to prevent the problem from recurring.

25. Planned Changes

The discharger shall file with the Regional Water Board an application at least 120 days before making any material change or proposed change in the character, location or volume of the discharge.

26. Other Information

When the discharger becomes aware that it failed to submit any relevant facts in a permit application or submitted incorrect information in a permit application, or in any report to the Regional Water Board, the discharger shall promptly submit such facts or information.

27. False Reporting

Any person who knowingly makes any false statement, representation, or certification in any record or other document submitted or required to be maintained under this Order, including monitoring reports or reports of compliance or noncompliance shall be subject to enforcement procedures as identified in the Order and/or in these Standard Provisions.

28. Anticipated Noncompliance

The discharger shall give advance notice to the Regional Water Board of any planned changes in the permitted facility or activity that may result in noncompliance with waste discharge requirements.

E. ENFORCEMENT PROVISIONS

1. The provisions in this enforcement section shall not act as a limitation on the statutory or regulatory authority of the Regional Water Board.
2. Any violation of this Order constitutes violation of the California Water Code and regulations adopted thereunder and is the basis for enforcement action, termination of the Order, revocation and reissuance of the Order, denial of an application for reissuance of the Order or a combination thereof.
3. It shall not be a defense for a discharger in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this Order.

Expiration

Individual coverage by this Order expires upon completion of the structure repainting project or five years from the date of coverage under the General WDRs, whichever occurs first. If the discharger wishes to continue an activity regulated by this Order after the expiration date of coverage by this Order, the discharger shall apply for and obtain new Waste Discharge Requirements. A new report of waste discharge must be submitted to the Regional Water Board at least 30 days in advance of new coverage by Waste Discharge Requirements.

Certification

I, Susan Warner, Executive Officer, do hereby certify that the foregoing is a full, true, and correct copy of an Order adopted by the California Regional Water Quality Control Board, North Coast Region, on May 15, 2003.

Susan A. Warner
Executive Officer

California Regional Water Quality Control Board
North Coast Region

MONITORING AND REPORTING PROGRAM NO. R1-2003-0041

FOR

DISCHARGES ASSOCIATED WITH TRANSPORTATION STRUCTURE
REPAINTING ACTIVITIES

All Counties

MONITORING

The following monitoring program shall be conducted whenever there is any waste discharge from transportation structure repainting activities to a surface water or locations where these materials could pass into surface waters. Fugitive sandblasting dust that escapes from the sandblasting containment system constitutes a waste discharge. The sampling schedule shall continue until the discharge stops. Samples of the affected waterway in the area of the discharge shall be collected immediately downstream as well as immediately upstream from the affected area and shall be analyzed for the following:

<u>Constituent</u>	<u>Units</u>	<u>Type of Sample</u>	<u>Frequency</u>
Turbidity	NTU's	Grab	Not less than once every four hours
Lead	ppb	Grab	Not less than once every four hours

REPORTING

Monitoring reports shall be submitted to the Regional Water Board monthly by the first day of the second month following the monitoring period. Monitoring reports shall include all laboratory analyses reports. If no discharge occurs, no monitoring report need be submitted.

In reporting monitoring data, the discharger shall arrange the data in tabular form on an 8 1/2 by 11-inch sheet so the date, constituents, and concentrations are readily discernible. The monitoring reports shall contain new data as well as historical data. The monitoring reports shall contain a detailed map showing the location of sample collection points. If the discharger is unable to collect samples for any reason, the monitoring report shall so indicate. The monitoring data and any necessary narrative reports shall be properly titled and referenced to this Order and shall be submitted to the Regional Water Board and certified to be true and correct by penalty of perjury.

NOTIFICATION

In the event of a discharge to a surface water or locations where these materials could pass into surface waters, the discharger shall notify the Executive Officer by telephone as soon as he or his agents have knowledge of the incident and confirm this notification in writing within two weeks of the telephone notification. The written notification shall include pertinent information explaining reasons for the noncompliance and shall indicate the steps taken to correct the problem, the dates thereof, and the steps being taken to prevent the problem from recurring.

Ordered by: _____

Susan A. Warner
Executive Officer

May 15, 2003

INFORMATION HANDOUT

For Contract No. 01-0E2304

At 01-HUM-101-R48.7

Identified by

Project ID 0114000026

PERMITS

WATER QUALITY

PLAC - California Regional Water Quality Control Board, North Coast Region

Notice of Coverage, General Waste Discharge Requirements for Discharges Associated with Transportation Structure Repainting Activities Order No. R1-2003-0041, dated April 20, 2015

CRWQCB North Coast Region Order No. R1-2003-0041 General Waste Discharges Associated with Transportation Structure Repainting Activities

CRWQCB North Coast Region Monitoring and Reporting Program No. R1-2003-0041 for Discharges Associated with Transportation Structure Repainting Activities

MATERIALS INFORMATION

Asbestos and Paint (Lead and Hexavalent Chromium) Survey Report R. Fleisher Memorial Bridge (04-0014) dated July 29, 2011



Project No. S9300-06-162
July 29, 2011

Steve Werner, Task Order Manager
Caltrans District 1
Environmental Engineering Office
1656 Union Street
Eureka, California 95501

Subject: ASBESTOS AND PAINT (LEAD AND HEXAVALENT CHROMIUM)
SURVEY REPORT
R. FLEISHER MEMORIAL BRIDGE (04-0014)
HUMBOLDT COUNTY, CALIFORNIA
CONTRACT NO. 03A1368, E-FIS 01 0002 0284 (EA 01-496600)
TASK ORDER NO. 162, 01-HUM-101, PM 48.69

Dear Mr. Werner:

In accordance with California Department of Transportation Contract No. 03A1368 and Task Order No. 162, we have performed an asbestos and lead-containing paint (LCP) survey of the subject bridge in Humboldt County, California. The scope of services included surveying the bridge for suspect asbestos-containing materials and lead-containing paint, collecting bulk samples, and submitting the samples to laboratories for analyses.

PROJECT DESCRIPTION

The project consists of the R. Fleisher Memorial Bridge (04-0014) over the Eel River at Post Mile (PM) 48.69 on Highway 101 in Humboldt County, California. We performed asbestos and LCP survey activities at the project location. The project location is depicted on the Vicinity Map, Figure 1, and Site Plan, Figure 2.

GENERAL OBJECTIVES

The scope of services outlined in TO-162 included the determination of the presence and quantity of asbestos and LCP at the project location prior to various improvements. Assuming that no asbestos is added during future operations, our survey would satisfy National Emissions Standards for Hazardous Air Pollutants (NESHAP) requirements. 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.

BACKGROUND

Asbestos

The Code of Federal Regulations (CFR), 40 CFR 61, Subpart M, 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).

Paint (Lead and Hexavalent Chromium)

Construction activities (including demolition) that disturb materials or paints containing *any* amount of lead or hexavalent chromium are subject to certain requirements of the Cal/OSHA lead and hexavalent chromium standards contained in Title 8, CCR, Sections 1532.1 and 1532.2, respectively. 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 paint component would require waste characterization and appropriate disposal. Intact paint on a component is currently accepted by most landfills and recycling 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).

For a solid waste containing hexavalent chromium, the waste is classified as California hazardous when: 1) the total hexavalent chromium content equals or exceeds the respective TTLC of 500 mg/kg; or 2) the soluble hexavalent chromium content equals or exceeds the respective STLC of 5 mg/l based on the standard WET. A waste has the potential for exceeding the hexavalent chromium STLC when the waste's total hexavalent chromium 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 hexavalent chromium is detected at a concentration greater than or equal to 50 mg/kg, and assuming that 100 percent of the total hexavalent chromium is soluble, soluble hexavalent chromium analysis is required. Hexavalent chromium-containing waste is classified as RCRA hazardous, or Federal hazardous, when the soluble hexavalent chromium content equals or exceeds the Federal regulatory level of 5 mg/l based on the 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 paint coatings during demolition. Dust containing hazardous concentrations of lead or hexavalent chromium may be generated during scraping or cutting materials coated with paint. Torching of these materials may produce hazardous fumes. Therefore, air monitoring and/or respiratory protection may be required during the demolition of materials coated with lead or hexavalent chromium-containing paint. Guidelines regarding regulatory provisions for construction work where workers may be exposed to lead or hexavalent chromium are presented in Title 8, CCR, Sections 1532.1 and 1532.2, respectively.

Architectural Drawings and Previous Survey Activities

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

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 June 6, 2011.

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 five bulk asbestos samples representing three suspect components were collected.

Our procedures for inspection and sampling in accordance with TO-162 are discussed below:

- Collected bulk asbestos samples after first wetting friable materials with a light mist of water. The samples were then cut from the substrate and transferred to labeled containers.
- 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 five-day turnaround time.

Approximate sample locations are presented on Figure 2. Materials represented by the samples collected are shown in the attached photographs.

Paint (Lead and Hexavalent Chromium)

Three bulk paint samples were collected from suspect LCP observed at the project location. We did not observe deteriorated LCP during our survey. Our sampling procedures in accordance with TO-162 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 analyses were requested on a seven-day turnaround time. *At the direction of Caltrans, we requested that the paint sample we collected from steel members of the bridge be analyzed for hexavalent chromium in accordance with EPA Test Method 7196A.*

Approximate sample locations are presented on Figure 2. Materials represented by the samples collected are shown in the attached photographs.

INVESTIGATIVE RESULTS

Asbestos

Chrysotile asbestos at a concentration of 30% was detected in a sample representing approximately 120 square feet of nonfriable sheet packing used as shims on the bridge barrier rail systems.

No asbestos was detected in samples of the remaining suspect materials collected during our survey. Sample identification numbers, material descriptions, approximate quantities, friability assessments,

and a summary of the analytical laboratory test results for asbestos are summarized below. Reproductions of the laboratory report and chain-of-custody documentation are attached.

Polarized Light Microscopy (PLM) - EPA Test Method 600/R-93/116				
Sample No.	Description of Material	Approximate Quantity	Friable	Asbestos Content
0014-1A and B	Concrete	NA	NA	ND
0014-2A and B	Expansion joint fill material	NA	NA	ND
0014-3A	Barrier rail shims	120 square feet	No	30%

NA = Not applicable (no asbestos detected)

ND = Not detected

Paint (Lead and Hexavalent Chromium)

A sample representing intact yellow traffic striping exhibited a total lead concentration of 250 mg/kg, a WET lead concentration of 6.4 mg/l, and a TCLP lead concentration of 1.9 mg/l.

A sample representing intact white traffic striping exhibited a total lead concentration of 12 mg/kg.

A sample representing intact the green paint system applied to steel members of the bridge exhibited a total lead concentration of 2.1 mg/kg. *The sample did not hexavalent chromium above the laboratory reporting limit [RL] of 4.9 mg/kg.*

Sample identification numbers, descriptions, peeling and flaking quantities, and a summary of the analytical laboratory test results for paint are summarized below. Reproductions of the laboratory reports and chain-of-custody documentation are attached.

Total and Soluble Lead/Hexavalent Chromium					
Sample No.	Paint Description	Approximate Quantity Peeling/Flaking	Total Lead (mg/kg)	WET Lead (mg/l)	TCLP Lead (mg/l)
0014-P1	Yellow traffic striping	Intact	250	6.4	1.9
0014-P2	White traffic striping	Intact	12	---	---
0014-P3	Green paint/primer system (girders)	Intact	2.1 (<4.9 CrVI)	--- (CrVI)	--- (CrVI)

mg/kg = milligrams per kilogram (EPA Test Method 6010)

mg/l = milligrams per liter

WET = Waste Extraction Test (EPA Test Method 7420)

TCLP = Toxicity Characteristic Leaching Procedure (EPA Test Method 1311)

CrVI = Hexavalent Chromium

--- = Not analyzed

< = Not detected at or above the indicated laboratory reporting limit

RECOMMENDATIONS

Asbestos

NESHAP regulations do not require that asbestos-containing sheet piling (a Category I nonfriable/nonhazardous material) identified during our survey be removed prior to demolition or be treated as hazardous waste. However, the disturbance of the material is still covered by the Cal/OSHA asbestos standard (Title 8, CCR Section 1529).

We recommend that a licensed contractor registered with Cal/OSHA for asbestos-related work perform any activities that would *disturb* the asbestos-containing materials identified during our survey. Contractors are responsible for informing the landfill of the contractor's intent to dispose of asbestos waste. Some landfills and recycling facilities may require additional waste characterization. Contractors are responsible for segregating and characterizing waste streams prior to disposal.

Geocon also recommends the notification of contractors (that will be conducting renovation or related activities) of the presence of asbestos in their work areas (i.e., provide contractor[s] with a copy of this report and a list of asbestos removed during subsequent activities). Contractors not trained for asbestos work should be instructed not to disturb asbestos during their activities.

Written notification to the North Coast Unified Air Quality Management District (NCUAQMD) is required ten working days prior to commencement of *any* demolition activity (whether asbestos is present or not).

Paint (Lead and Hexavalent Chromium)

Yellow traffic striping sampled during our survey would be classified as California hazardous based on lead content if stripped, blasted, or otherwise separated from the substrate.

White traffic striping and green paint sampled during our survey would not be considered a California or Federal hazardous waste based on lead content.

Hexavalent chromium and lead in the green paint system were not detected at levels that would be considered California or Federal hazardous.

We recommend that all paints at the project location (graffiti, graffiti abatement, signage, etc.) 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.

We recommend that the green paint system (applied to steel members of the bridge) be treated as hexavalent chromium-containing for purposes of determining the applicability of the Cal/OSHA hexavalent chromium standard during any future maintenance, renovation, and demolition activities.

(Hexavalent chromium may be present at levels below the laboratory reporting limit.) Compliance requirements regarding construction activities where workers may be exposed to hexavalent chromium are presented in Title 8, CCR, Section 1532.2.

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 above. 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.

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.

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

Sincerely,

GEOCON CONSULTANTS INC.



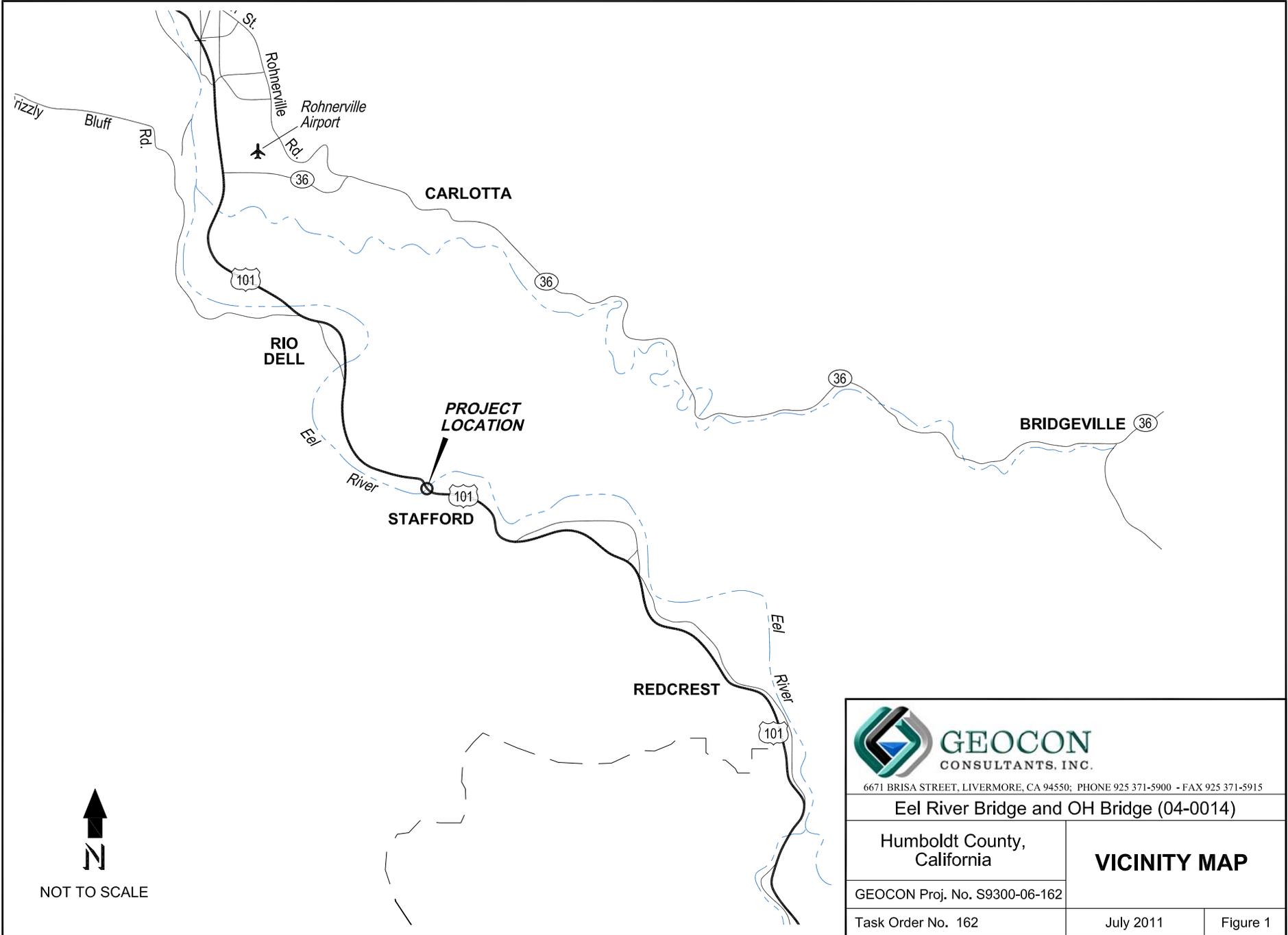
David A. Watts, CAC
Senior Project Scientist



John E. Juhrend, PE, CEG
Project Manager

(2 + 4 CD) Addressee

Attachments: Figure 1, Vicinity Map
 Figure 2, Site Plan
 Site Photographs (1 through 3)
 Analytical Laboratory Reports and Chain-of-custody Documentation

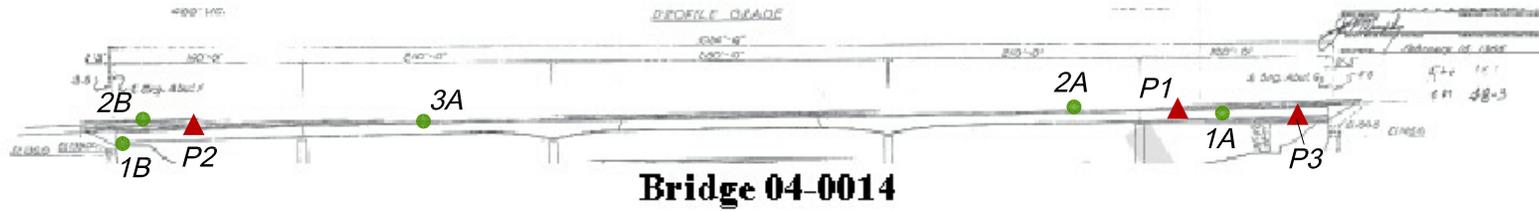


NOT TO SCALE

 <p>6671 BRISA STREET, LIVERMORE, CA 94550; PHONE 925 371-5900 - FAX 925 371-5915</p>	
<p>Eel River Bridge and OH Bridge (04-0014)</p>	
<p>Humboldt County, California</p>	<p>VICINITY MAP</p>
<p>GEOCON Proj. No. S9300-06-162</p>	<p>Task Order No. 162</p>
<p>July 2011</p>	<p>Figure 1</p>

LEGEND:

- Approximate Asbestos Sample Location
- ▲ Approximate Paint Sample Location



 6671 BRISA STREET, LIVERMORE, CA 94550; PHONE 925 371-5900 - FAX 925 371-5915		
		Eel River Bridge and OH Bridge (04-0014)
Humboldt County, California	SITE PLAN	
GEOCON Proj. No. S9300-06-162		
Task Order No. 162	July 2011	Figure 2

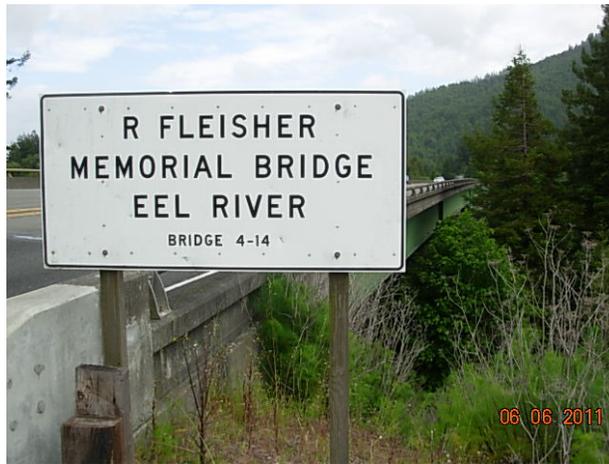


Photo 1 – Bridge 04-0014 in Humboldt County, California



Photo 2 – Bridge deck and barrier rails (with shims)



Photo 3 – Bridge abutment



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

Eel River Bridge and OH Bridge 04-0014
Humboldt County, California

S9300-06-162

Task Order No. 162

July 2011



EMSL Analytical, Inc.
528 Mineola Avenue, Carle Place, NY 11514

Phone: (516) 997-7251 Fax: (516) 997-7528 Email: carleplacelab@emsl.com

Attn: **Dave Watts**
Geocon Consultants, Inc.
6671 Brisa Street

Livermore, CA 94550

Customer ID: GECN21
Customer PO:
Received: 06/13/11 9:00 AM
EMSL Order: 061105155

Fax: (925) 371-5915 Phone: (925) 371-5900
Project: **04-0014, S9300-06-162**

EMSL Proj: S9300-06-**
Analysis Date: 6/18/2011

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

Sample	Description	Appearance	Non-Asbestos		Asbestos
			% Fibrous	% Non-Fibrous	% Type
0014-1A <i>061105155-0001</i>	Concrete	Gray Non-Fibrous Heterogeneous		100% Non-fibrous (other)	None Detected
0014-1B <i>061105155-0002</i>	Concrete	Gray Non-Fibrous Heterogeneous		100% Non-fibrous (other)	None Detected
0014-2A <i>061105155-0003</i>	EJM	Black Non-Fibrous Heterogeneous	60% Cellulose	40% Non-fibrous (other)	None Detected
0014-2B <i>061105155-0004</i>	EJM	Black Fibrous Heterogeneous	60% Cellulose	40% Non-fibrous (other)	None Detected
0014-3A <i>061105155-0005</i>	SHIMS	Black Non-Fibrous Heterogeneous		70% Non-fibrous (other)	30% Chrysotile

Initial report from 06/20/2011 08:57:41

Analyst(s)

Chris Olsen (5)

Michelle McGowan, Laboratory Manager
or other approved signatory

EMSL maintains liability limited to cost of analysis. This report relates only to the samples reported and may not be reproduced, except in full, without written approval by EMSL. EMSL bears no responsibility for sample collection activities or analytical method limitations. Interpretation and use of test results are the responsibility of the client. This report must not be used by the client to claim product certification, approval, or endorsement by NVLAP, NIST or any agency of the federal government. Non-friable organically bound materials present a problem matrix and therefore EMSL recommends gravimetric reduction prior to analysis. Samples received in good condition unless otherwise noted.

Samples analyzed by EMSL Analytical, Inc. Carle Place, NY NVLAP Lab Code 101048-10, CA ELAP 2339, NYS ELAP 11469



EMSL ANALYTICAL, INC.
LABORATORY PRODUCTS TRAINING

Asbestos Chain of Custody

EMSL Order Number (Lab Use Only):

00105155

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

Company: GEDCON		EMSL-Bill to: <input checked="" type="checkbox"/> Same <input type="checkbox"/> 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 #: 925-371-5915	
Telephone #: 925-371-5900		Email Address: WATTS@GEDCONINC.COM	
Project Name/Number: 04-0014		39300-06-162	
Please Provide Results: <input type="checkbox"/> Fax <input checked="" type="checkbox"/> 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 <input type="checkbox"/> NIOSH 7400 <input type="checkbox"/> w/ OSHA 8hr. TWA PLM - Bulk (reporting limit) <input checked="" type="checkbox"/> PLM EPA 600/R-93/116 (<1%) <input type="checkbox"/> PLM EPA NOB (<1%) Point Count <input type="checkbox"/> 400 (<0.25%) <input type="checkbox"/> 1000 (<0.1%) Point Count w/Gravimetric <input type="checkbox"/> 400 (<0.25%) <input type="checkbox"/> 1000 (<0.1%) <input type="checkbox"/> NYS 198.1 (friable in NY) <input type="checkbox"/> NYS 198.6 NOB (non-friable-NY) <input type="checkbox"/> NIOSH 9002 (<1%)	TEM - Air <input type="checkbox"/> 4-4.5hr TAT (AHERA only) <input type="checkbox"/> AHERA 40 CFR, Part 763 <input type="checkbox"/> NIOSH 7402 <input type="checkbox"/> EPA Level II <input type="checkbox"/> ISO 10312 TEM - Bulk <input type="checkbox"/> TEM EPA NOB <input type="checkbox"/> NYS NOB 198.4 (non-friable-NY) <input type="checkbox"/> Chatfield SOP <input type="checkbox"/> TEM Mass Analysis-EPA 600 sec. 2.5 TEM - Water: EPA 100.2 Fibers >10µm <input type="checkbox"/> Waste <input type="checkbox"/> Drinking All Fiber Sizes <input type="checkbox"/> Waste <input type="checkbox"/> Drinking	TEM-Dust <input type="checkbox"/> Microvac - ASTM D 5755 <input type="checkbox"/> Wipe - ASTM D6480 <input type="checkbox"/> Carpet Sonication (EPA 600/J-93/167) Soil/Rock/Vermiculite <input type="checkbox"/> PLM CARB 435 - A (0.25% sensitivity) <input type="checkbox"/> PLM CARB 435 - B (0.1% sensitivity) <input type="checkbox"/> TEM CARB 435 - B (0.1% sensitivity) <input type="checkbox"/> TEM CARB 435 - C (0.01% sensitivity) <input type="checkbox"/> EPA Protocol (Semi-Quantitative) <input type="checkbox"/> EPA Protocol (Quantitative) Other: <input type="checkbox"/>
---	--	---

Check For Positive Stop - Clearly Identify Homogenous Group

Samplers Name: **D. WATTS** Samplers Signature: **Watts**

Sample #	Sample Description	Volume/Area (Air) HA # (Bulk)	Date/Time Sampled
0014-1A/1B	CONCRETE	NA	6/6/11
↓ - 2A/2B	ESM	↓	RECEIVED EMSL ANALYTICAL, INC. SAN LEANDRO, CA, NY JUN 15 AM 9:38
↓ - 3A	SHIMS	↓	

Client Sample # (s):	-	Total # of Samples:	5
Relinquished (Client):	Watts	Date:	6/9/11
Received (Lab):	Watts	Date:	6/13/11
Comments/Special Instructions:			

Relinquished by EMSL San
Leandro **6/14/11 1630**

June 30, 2011



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
ORELAP No.: CA300003
Workorder No.: 118381

RE: 04-0014, S9300-06-162

Attention: Dave Watts

Enclosed are the results for sample(s) received on June 13, 2011 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,

A handwritten signature in black ink, appearing to read "Eddie F. Rodriguez".

Eddie F. Rodriguez
Laboratory Director

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



CLIENT: Geocon Consultants, Inc.
Project: 04-0014, S9300-06-162
Lab Order: 118381

CASE NARRATIVE

Analytical Comments for Method 7420

Matrix Spike (MS) and /or Matrix Spike Duplicate (MSD) are/is outside recovery criteria for sample 118471-007AMSD; however, the analytical batch was validated by the Laboratory Control Sample (LCS).



Advanced Technology Laboratories

ANALYTICAL RESULTS

Print Date: 30-Jun-11

CLIENT: Geocon Consultants, Inc.
Project: 04-0014, S9300-06-162

Lab Order: 118381

Lab ID: 118381-001

Collection Date: 6/6/2011

Client Sample ID: 0014-P1

Matrix: PAINT CHIP

Analyses	Result	PQL	Qual	Units	DF	Date Analyzed
----------	--------	-----	------	-------	----	---------------

ICP METALS

EPA 3050B

EPA 6010B

RunID: ICP8_110616F	QC Batch: 73626				PrepDate: 6/16/2011	Analyst: CBB
Lead	250	2.0		mg/Kg	1	6/16/2011 09:56 PM

LEAD BY ATOMIC ABSORPTION (STLC)

WET

WET/ EPA 7420

RunID: AA2_110624A	QC Batch: 73804				PrepDate: 6/22/2011	Analyst: VV
Lead	6.4	0.25		mg/L	1	6/24/2011 12:33 PM

LEAD BY ATOMIC ABSORPTION (TCLP)

EPA3010A

EPA 1311/ 7420

RunID: AA2_110628B	QC Batch: 73919				PrepDate: 6/28/2011	Analyst: VV
Lead	1.9	0.27		mg/L	1	6/28/2011 03:14 PM

Lab ID: 118381-002

Collection Date: 6/6/2011

Client Sample ID: 0014-P2

Matrix: PAINT CHIP

Analyses	Result	PQL	Qual	Units	DF	Date Analyzed
----------	--------	-----	------	-------	----	---------------

ICP METALS

EPA 3050B

EPA 6010B

RunID: ICP8_110616F	QC Batch: 73626				PrepDate: 6/16/2011	Analyst: CBB
Lead	12	3.9		mg/Kg	1	6/16/2011 10:00 PM

Lab ID: 118381-003

Collection Date: 6/6/2011

Client Sample ID: 0014-P3

Matrix: PAINT CHIP

Analyses	Result	PQL	Qual	Units	DF	Date Analyzed
----------	--------	-----	------	-------	----	---------------

ICP METALS

EPA 3050B

EPA 6010B

RunID: ICP8_110616F	QC Batch: 73626				PrepDate: 6/16/2011	Analyst: CBB
Lead	2.1	2.0		mg/Kg	1	6/16/2011 10:05 PM

HEXAVALENT CHROMIUM, DISSOLVED

EPA 7196A

RunID: WETCHEM3_110617B	QC Batch: 73681				PrepDate: 6/17/2011	Analyst: AAG
Chromium, Hexavalent	ND	4.9		mg/Kg	1	6/17/2011

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



Advanced Technology
Laboratories

3275 Walnut Avenue, Signal Hill, CA 90755 Tel: 562.989.4045 Fax: 562.989.4040

CLIENT: Geocon Consultants, Inc.
Work Order: 118381
Project: 04-0014, S9300-06-162

ANALYTICAL QC SUMMARY REPORT

TestCode: 6010_S

Sample ID: MB-73626	SampType: MBLK	TestCode: 6010_S	Units: mg/Kg	Prep Date: 6/16/2011	RunNo: 134131						
Client ID: PBS	Batch ID: 73626	TestNo: EPA 6010B EPA 3050B		Analysis Date: 6/16/2011	SeqNo: 2191333						
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual

Lead ND 1.0

Sample ID: LCS-73626	SampType: LCS	TestCode: 6010_S	Units: mg/Kg	Prep Date: 6/16/2011	RunNo: 134131						
Client ID: LCSS	Batch ID: 73626	TestNo: EPA 6010B EPA 3050B		Analysis Date: 6/16/2011	SeqNo: 2191333						
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual

Lead 51.843 1.0 50.00 0 104 80 120

Sample ID: 118186-001A-DUP	SampType: DUP	TestCode: 6010_S	Units: mg/Kg	Prep Date: 6/16/2011	RunNo: 134131						
Client ID: ZZZZZZ	Batch ID: 73626	TestNo: EPA 6010B EPA 3050B		Analysis Date: 6/16/2011	SeqNo: 2191333						
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual

Lead 787.992 1.0 919.1 15.4 20

Sample ID: 118186-001A-MS	SampType: MS	TestCode: 6010_S	Units: mg/Kg	Prep Date: 6/16/2011	RunNo: 134131						
Client ID: ZZZZZZ	Batch ID: 73626	TestNo: EPA 6010B EPA 3050B		Analysis Date: 6/16/2011	SeqNo: 2191334						
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual

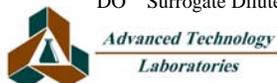
Lead 1034.693 1.0 125.0 919.1 92.5 34 126

Sample ID: 118186-001A-MSD	SampType: MSD	TestCode: 6010_S	Units: mg/Kg	Prep Date: 6/16/2011	RunNo: 134131						
Client ID: ZZZZZZ	Batch ID: 73626	TestNo: EPA 6010B EPA 3050B		Analysis Date: 6/16/2011	SeqNo: 2191335						
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual

Lead 1037.827 1.0 125.0 919.1 95.0 34 126 1035 0.302 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: 118381
Project: 04-0014, S9300-06-162

ANALYTICAL QC SUMMARY REPORT

TestCode: 7196_S

Sample ID: 118376-003A-DUP	SampType: DUP	TestCode: 7196_S	Units: mg/Kg	Prep Date: 6/17/2011	RunNo: 134189						
Client ID: ZZZZZ	Batch ID: 73681	TestNo: EPA 7196A		Analysis Date: 6/17/2011	SeqNo: 2192894						
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Chromium, Hexavalent	67.621	0.99						71.85	6.07	20	

Sample ID: LCS-73681	SampType: LCS	TestCode: 7196_S	Units: mg/Kg	Prep Date: 6/17/2011	RunNo: 134189						
Client ID: LCSS	Batch ID: 73681	TestNo: EPA 7196A		Analysis Date: 6/17/2011	SeqNo: 2192903						
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Chromium, Hexavalent	4.570	0.10	5.000	0	91.4	85	115				

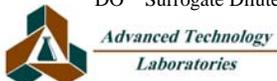
Sample ID: MB-73681	SampType: MBLK	TestCode: 7196_S	Units: mg/Kg	Prep Date: 6/17/2011	RunNo: 134189						
Client ID: PBS	Batch ID: 73681	TestNo: EPA 7196A		Analysis Date: 6/17/2011	SeqNo: 2192904						
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Chromium, Hexavalent	ND	0.10									

Sample ID: MB-73681-MS	SampType: MS	TestCode: 7196_S	Units: mg/Kg	Prep Date: 6/17/2011	RunNo: 134189						
Client ID: ZZZZZ	Batch ID: 73681	TestNo: EPA 7196A		Analysis Date: 6/17/2011	SeqNo: 2192905						
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Chromium, Hexavalent	4.550	0.10	5.000	0	91.0	85	115				

Sample ID: MB-73681-MSD	SampType: MSD	TestCode: 7196_S	Units: mg/Kg	Prep Date: 6/17/2011	RunNo: 134189						
Client ID: ZZZZZ	Batch ID: 73681	TestNo: EPA 7196A		Analysis Date: 6/17/2011	SeqNo: 2192906						
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Chromium, Hexavalent	4.530	0.10	5.000	0	90.6	85	115	4.550	0.441	20	

Qualifiers:

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



CLIENT: Geocon Consultants, Inc.
Work Order: 118381
Project: 04-0014, S9300-06-162

ANALYTICAL QC SUMMARY REPORT

TestCode: 7420_ST

Sample ID: MB-73804A	SampType: MBLK	TestCode: 7420_ST	Units: mg/L	Prep Date: 6/22/2011	RunNo: 134378						
Client ID: PBS	Batch ID: 73804	TestNo: WET/ EPA 74 WET		Analysis Date: 6/24/2011	SeqNo: 2196508						
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Lead	ND	0.25									

Sample ID: LCS-73804	SampType: LCS	TestCode: 7420_ST	Units: mg/L	Prep Date: 6/22/2011	RunNo: 134378						
Client ID: LCSS	Batch ID: 73804	TestNo: WET/ EPA 74 WET		Analysis Date: 6/24/2011	SeqNo: 2196508						
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Lead	4.894	0.25	5.000	0	97.9	80	120				

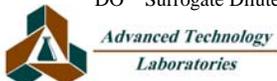
Sample ID: 118471-006A-DUP	SampType: DUP	TestCode: 7420_ST	Units: mg/L	Prep Date: 6/22/2011	RunNo: 134378						
Client ID: ZZZZZ	Batch ID: 73804	TestNo: WET/ EPA 74 WET		Analysis Date: 6/24/2011	SeqNo: 2196517						
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Lead	4.340	0.25						4.181	3.74	20	

Sample ID: 118471-006A-MS	SampType: MS	TestCode: 7420_ST	Units: mg/L	Prep Date: 6/22/2011	RunNo: 134378						
Client ID: ZZZZZ	Batch ID: 73804	TestNo: WET/ EPA 74 WET		Analysis Date: 6/24/2011	SeqNo: 2196518						
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Lead	8.396	0.50	5.000	4.181	84.3	80	120				

Sample ID: MB-73804B	SampType: MBLK	TestCode: 7420_ST	Units: mg/L	Prep Date: 6/22/2011	RunNo: 134378						
Client ID: PBS	Batch ID: 73804	TestNo: WET/ EPA 74 WET		Analysis Date: 6/24/2011	SeqNo: 2196519						
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Lead	ND	0.25									

Qualifiers:

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



CLIENT: Geocon Consultants, Inc.
Work Order: 118381
Project: 04-0014, S9300-06-162

ANALYTICAL QC SUMMARY REPORT

TestCode: 7420_ST

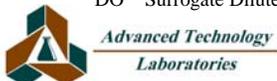
Sample ID: 118471-007A-DUP	SampType: DUP	TestCode: 7420_ST	Units: mg/L	Prep Date: 6/22/2011	RunNo: 134378						
Client ID: ZZZZZZ	Batch ID: 73804	TestNo: WET/ EPA 74 WET	Analysis Date: 6/24/2011	SeqNo: 2196526							
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Lead	40.818	1.2						42.47	3.98	20	

Sample ID: 118471-007A-MS	SampType: MS	TestCode: 7420_ST	Units: mg/L	Prep Date: 6/22/2011	RunNo: 134378						
Client ID: ZZZZZZ	Batch ID: 73804	TestNo: WET/ EPA 74 WET	Analysis Date: 6/24/2011	SeqNo: 2196527							
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Lead	47.548	2.5	5.000	42.47	101	80	120				

Sample ID: 118471-007A-MSD	SampType: MSD	TestCode: 7420_ST	Units: mg/L	Prep Date: 6/22/2011	RunNo: 134378						
Client ID: ZZZZZZ	Batch ID: 73804	TestNo: WET/ EPA 74 WET	Analysis Date: 6/24/2011	SeqNo: 2196528							
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Lead	48.625	2.5	5.000	42.47	123	80	120	47.55	2.24	20	S

Qualifiers:

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



CLIENT: Geocon Consultants, Inc.
Work Order: 118381
Project: 04-0014, S9300-06-162

ANALYTICAL QC SUMMARY REPORT

TestCode: 7420_TC

Sample ID: MB-73919A	SampType: MBLK	TestCode: 7420_TC	Units: mg/L	Prep Date: 6/28/2011	RunNo: 134487						
Client ID: PBS	Batch ID: 73919	TestNo: EPA 1311/ 74 EPA3010A	Analysis Date: 6/28/2011	SeqNo: 2198744							
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Lead	ND	0.25									

Sample ID: MB-73909B TCLP	SampType: MBLK	TestCode: 7420_TC	Units: mg/L	Prep Date: 6/28/2011	RunNo: 134487						
Client ID: PBS	Batch ID: 73919	TestNo: EPA 1311/ 74 EPA3010A	Analysis Date: 6/28/2011	SeqNo: 2198745							
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Lead	ND	0.25									

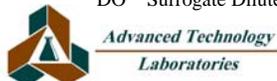
Sample ID: LCS-73919	SampType: LCS	TestCode: 7420_TC	Units: mg/L	Prep Date: 6/28/2011	RunNo: 134487						
Client ID: LCSS	Batch ID: 73919	TestNo: EPA 1311/ 74 EPA3010A	Analysis Date: 6/28/2011	SeqNo: 2198746							
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Lead	1.046	0.25	1.000	0	105	80	120				

Sample ID: 118621-005A-DUP	SampType: DUP	TestCode: 7420_TC	Units: mg/L	Prep Date: 6/28/2011	RunNo: 134487						
Client ID: ZZZZZZ	Batch ID: 73919	TestNo: EPA 1311/ 74 EPA3010A	Analysis Date: 6/28/2011	SeqNo: 2198756							
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: 118621-005A-MS	SampType: MS	TestCode: 7420_TC	Units: mg/L	Prep Date: 6/28/2011	RunNo: 134487						
Client ID: ZZZZZZ	Batch ID: 73919	TestNo: EPA 1311/ 74 EPA3010A	Analysis Date: 6/28/2011	SeqNo: 2198757							
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Lead	2.863	0.25	2.500	0	115	70	130				

Qualifiers:

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



CLIENT: Geocon Consultants, Inc.
Work Order: 118381
Project: 04-0014, S9300-06-162

ANALYTICAL QC SUMMARY REPORT

TestCode: 7420_TC

Sample ID: 118621-005A-MSD	SampType: MSD	TestCode: 7420_TC	Units: mg/L	Prep Date: 6/28/2011	RunNo: 134487						
Client ID: ZZZZZZ	Batch ID: 73919	TestNo: EPA 1311/ 74 EPA3010A		Analysis Date: 6/28/2011	SeqNo: 2198758						
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Lead	2.768	0.25	2.500	0	111	70	130	2.863	3.39	20	

Qualifiers:

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



*Advanced Technology
Laboratories*

3275 Walnut Avenue, Signal Hill, CA 90755 Tel: 562.989.4045 Fax: 562.989.4040

Diane Galvan

From: David Watts [watts@geoconinc.com]
Sent: Monday, June 13, 2011 1:10 PM
To: Diane Galvan
Cc: Steve Werner
Subject: S9300-06-162

Diane,

For the paint samples you receive today on this job:

- 1) Please run TCLPs on all samples with a TTLC of 1000 ppm or greater.
- 2) Please run WETs on any sample with a TTLC ranging from 50 to 999 ppm.
- 3) Please run TCLPs on any sample that fails WET that also has a TTLC of 100 ppm or greater.

Please run Cr6 on paint samples:

0072-P3
0123-P3
0014-P3
0017L-P3
0215-P2
0044-P3
0137-P3
0023-P3
0019-P3.

Standard TATs.

Thanks.



David Watts, CAC | Sr. Project Scientist
Geocon Consultants, Inc.
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