

PRELIMINARY SITE ASSESSMENT

SR 1100 (BRAWLEY SCHOOL ROAD) IMPROVEMENTS
TIP NO. R-3833C, WBS NO. 34554.2.4

NCDOT PARCEL NO. 68

OWNER: MARATHEA GROUP, LLC

2785 CHARLOTTE HIGHWAY

MOORESVILLE, IREDELL COUNTY, NORTH CAROLINA



PREPARED FOR:
NORTH CAROLINA DEPARTMENT OF TRANSPORTATION
C/O STANTEC
801 JONES FRANKLIN ROAD SUITE 300
RALEIGH NORTH CAROLINA 27606-3394

PREPARED BY:
FALCON ENGINEERING, INC.
1210 TRINITY ROAD, SUITE 110
CARY, NC 27513

PROJECT NUMBER: G18063.02
OCTOBER 27, 2019





October 27, 2019

Mr. A. Dean Sarvis PE
Stantec
801 Jones Franklin Road, Suite 300
Raleigh, North Carolina 27606-3394

Re: **Preliminary Site Assessment**
SR 1100 (Brawley School Road) Improvements
TIP No. R-3833C, WBS No. 34554.2.4
NCDOT Parcel No. 68
Owner: Maratheia Group, LLC
2785 Charlotte Highway
Mooresville, Iredell County, North Carolina

Dear Mr. Sarvis:

Falcon is pleased to present the following Preliminary Site Assessment in support of the above-mentioned Project. Specifically, Falcon sampled soil in proximity to the project limits on this parcel in general accordance with the approved scope of work. Soils requiring remediation or special handling during construction were not identified.

Falcon recommends if drums, USTs, above ground storage tanks (ASTs), petroleum odors or sheen are observed during any excavation associated with any property involved in the project that all work in the vicinity stop until further assessment takes place. Further assessment can include but is not limited to; sampling the soil and groundwater, excavation, and proper handling and disposal of contaminated soils and groundwater.

Please review this report and advise us if you have any questions or concerns. We appreciate this opportunity to provide services to you and look forward to partnering with you on future projects. If you have any questions, please give Falcon a call at (919) 871-0800.

Sincerely,

FALCON ENGINEERING, INC.

A handwritten signature in blue ink that reads "Christopher J. Burkhardt".

Christopher J. Burkhardt
Environmental Services Manager

A handwritten signature in blue ink that reads "Jeremy R. Hamm".

Jeremy R. Hamm, PE
Geotechnical Services Manager

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DIVISION OF WASTE MANAGEMENT (DWM) INSPECTION REPORT

DWM RECORD OF CONVERSATION

SECTION 1: INTRODUCTION

1.1 DESCRIPTION

Falcon Engineering, Inc. (Falcon) has completed a Preliminary Site Assessment of NCDOT TIP No. R-3833C Parcel No. 68. Parcel No. 68 is addressed as 2785 Charlotte Highway, Mooresville, Iredell County, North Carolina. NCDOT is proposing to improve SR 1100 (Brawley School Road) from SR 1116 (Falbert Road) to 1,000' east of US 21, including improvements to a number of intersecting roads and driveways throughout this corridor. The limits of the assessment are between the existing edge of NCDOT maintained pavement (within the existing NCDOT ROW) where accessible, and the proposed NCDOT ROW and/or easement (whichever boundary represents the largest area). Boring locations were placed in the vicinity of proposed excavations for drainage features, utilities, and roadway/ditch cuts to determine if soils requiring remediation or special handling were present where excavation is planned to take place.

1.2 SCOPE OF WORK

Falcon's scope of work included coordination of; public and private utility location near the proposed borings, geophysical surveys, collecting soil samples with a geoprobe, and laboratory analysis. Samples were analyzed for volatile organic compounds (VOCs) using traditional methods.

SECTION 2: HISTORY

2.1 PARCEL USAGE

Falcon performed a Phase I Environmental Site Assessment (ESA) for R-3833C under Project No. G18063.01 dated March 2019. The ESA identified this parcel as a Recognized Environmental Condition (REC) based on the parcel's history as a dry-cleaner. U.S. \$2.50 Cleaners was observed at this address during our site visit. This facility performs onsite dry-cleaning and has been in operation for 17 years according to The Real Yellow Pages website. The strip mall the cleaners is in was constructed in 1998. U.S. \$2.50 Cleaners is not in a database that reports spills or releases. However; this facility is considered a REC based on its use as a dry-cleaner and the potential for an undiscovered or unreported release.

2.2 FACILITY IDENTIFICATION NUMBER

Facility Identification Number 490002C was identified for this parcel.

2.3 GROUNDWATER INCIDENT NUMBER

A Groundwater Incident Number was not identified for this parcel.

SECTION 3: SITE OBSERVATIONS

3.1 GROUNDWATER MONITORING WELLS

Groundwater monitoring wells (MWs) were not observed on this parcel.

3.2 ACTIVE USTS

Active USTs were not observed within the project limits or registered at this parcel.

3.3 FEATURES APPARENT BEYOND ROW/EASEMENT

USTs, monitoring wells, remediation systems, or hydraulic lifts were not observed within the project limits.

SECTION 4: METHODOLOGY

4.1 GEOPHYSICS

Pyramid Geophysical Services (Pyramid) was subcontracted to perform a geophysical survey of the assessment area. The assessment area consists of the property frontage between the existing edge of NCDOT maintained pavement (within the existing NCDOT ROW) where accessible, and the proposed NCDOT ROW and/or easement (whichever boundary represents the largest area). The survey was used to locate private utility lines, as well as possible indications of USTs, and/or their pits.

The geophysical investigation consisted of electromagnetic (EM) induction-metal detection and ground penetrating radar (GPR) surveys. Pyramid collected the EM data using a Geonics EM61-MK2 (EM61) metal detector integrated with a Geode External GPS/GLONASS receiver. The integrated GPS system allows the location of the instrument to be recorded in real-time during data collection, resulting in an EM data set that is georeferenced and can be overlain on aerial photographs and CADD drawings.

GPR data was acquired across select EM anomalies (where identified), using a Geophysical Survey Systems, Inc. (GSSI) UtilityScan DF unit equipped with a dual frequency 300/800 MHz antenna. Pyramid marked their findings on the surface with paint. A boundary grid was established around the perimeter of the site with marks every 10 feet to maintain orientation of the instrument throughout the survey and to obtain adequate coverage. A copy of the full Geophysical Report is included in the Attachments.

4.2 BORINGS

Regional Probing was subcontracted to advance soil borings using direct push technology. Regional Probing used a truck mounted Geoprobe® 5410 unit mounted on an off-road modified Ford F350 Diesel 4x4. The unit has auger-capabilities and is equipped with a GH-42 soil-probing hammer, with 21,700 pounds of down force and 28,900 pounds of retraction force. The unit has an on-board tank for decontaminating the geoprobe rods before advancing the probe at each sample location.

4.3 SAMPLE PROTOCOL

Prior to initiating sample collection Falcon contacted NC One Call and requested public utility locations be marked around the proposed sample locations. Sampling was in general accordance with the NC Department of Environmental Quality (DEQ) Division of Waste Management's (DWM) "Guidelines for Site Checks, Tank Closure, and Initial Response and Abatement for UST Releases" (March 1, 2007 Version Change 9 – February 1, 2019) guidance document. Sampling strategy was derived based upon the project scope and objectives as outlined above. Pace Analytical (North Carolina Field Services Certification #: 5342) was selected to perform the volatile organic compound analytical analysis. Appropriate sterile containers were received by Falcon from Pace Analytical prior to beginning the fieldwork. The containers were labeled appropriately.

A Minirae 3000 photoionization detector (PID) was used to field screen samples for volatile organics to determine if a release had occurred. The instrument was calibrated per manufacturer instructions prior to use. Falcon staff bagged composite soil samples of each boring in approximately two-foot sections. Representative samples were placed in a sealed plastic bag for approximately 10 minutes to allow soil hydrocarbons to reach equilibrium within the headspace prior to scanning with the PID. One sample per boring was collected from the depth of the proposed cut or from the section above the depth of cut with the highest PID reading.

To avoid cross contamination, a new unused pair of non-powdered nitrile gloves was worn while extracting each sample. Samples were placed in the appropriate laboratory provided containers. The labels on each container were then completed so that each provided the date and time of sampling, method of analysis, sample collector, preservative used and sampling location identification. Samples were placed in an ice filled cooler and transported to the lab. Appropriate chain-of-custody procedures, including the completion of necessary forms, were followed.

SECTION 5: RESULTS

5.1 GEOPHYSICS

The geophysical investigation was performed on August 11 and 12, 2019 to investigate for the presence of unknown, metallic underground storage tanks (USTs) beneath the surface. The geophysical investigation consisted of electromagnetic (EM) induction-metal detection and ground penetrating radar (GPR) surveys. A total of nine EM anomalies were identified. The majority of the EM anomalies were directly attributed to visible cultural features at the ground surface. GPR was performed across areas containing significant metallic interference associated with vehicles, a reinforced concrete pipe, and known buried utility lines. No additional significant buried structures were identified. Collectively, the geophysical data did not record evidence of metallic USTs within the survey area at Parcel No. 68.

5.2 SAMPLE DATA

Falcon and our subcontractor advanced two borings (B-08, B-09) to the proposed excavation depth of the drainage features, utilities, or roadway/ditch cut being assessed. Groundwater was not observed. Please see the Boring Location Plan in the attachments for a visual depiction of the boring locations. The coordinates (latitude and longitude) that correspond to the boring locations are shown below in Table No. 1 Boring Coordinates.

TABLE NO. 1 BORING COORDINATES

| Boring | Latitude | Longitude |
|--------|------------|-------------|
| B-08 | 35.5815919 | -80.8397319 |
| B-09 | 35.5811946 | -80.8397533 |

The PID screening results are presented in Table No. 2 PID Readings. Borings were field screened with a PID for evidence of volatile organics in sections as indicated in Table No. 2. Falcon selected soil samples based on the field screening results and the needs of the project. Pace Analytical analyzed the selected samples and their full analytical report is attached.

Contaminants above detection levels were not reported in the samples.

TABLE NO. 2 PID READINGS

| Boring | Depth BGS* | PID** |
|--------|------------|------------|
| B-08 | 0-2 | 1.6 |
| | 2-4 | 2.1 |
| | 4-6 | 2.6 |
| | 6-8 | 2.3 |
| | 8-10 | 2.6 |
| B-09 | 0-2.5 | 2.2 |
| | 2.5-5 | 1.8 |
| | 5-7.5 | 1.6 |
| | 7.5-10 | 1.9 |

*BGS = Depth below ground surface in feet
 **PID readings are in parts per million
 Samples shown in **bold** were selected for analysis

5.3 SAMPLE OBSERVATIONS

Obvious visual indications of a release (stained soils, odors, or oily sheen) were not observed. Table No. 3 Soil Observations lists visual soil observations of color and texture.

TABLE NO. 3 SOIL OBSERVATIONS

| Sample ID | Depth | Color | Soil Type |
|-----------|-------|-----------|--|
| B-08 | 0-2 | Red | Silty Clay (A-7) w/ trace Organics |
| | 2-4 | Red Brown | Clayey Silt (A-5) w/ trace Mica |
| | 4-6 | Red | Sandy Clayey Silt (A-4) w/ trace Mica |
| | 6-10 | Red Brown | Sandy Clayey Silt (A-4) w/ trace Mica |
| B-09 | 0-2 | Red | Silty Clay (A-7) w/ trace Organics |
| | 2-4 | Red Brown | Sandy Clayey Silt (A-4) w/ trace Mica & Rock Frags |
| | 4-6 | Red | Sandy Clayey Silt (A-4) w/ trace Mica |
| | 6-10 | Red | Sandy Clayey Silt (A-4) w/ trace Mica |

Depth is in feet below ground surface

5.4 QUANTITIES CALCULATIONS

Soils requiring quantity calculations were not identified.

SECTION 6: CONCLUSIONS

6.1 INTERPRETATION OF RESULTS

This Preliminary Site Assessment was performed to evaluate the soils in proximity to the project limits on this parcel for the presence of VOCs. The findings are as follows:

- Soil sampling completed on the parcel did not identify contaminants in the soil sampled at levels requiring remediation.

6.2 GEOPHYSICS

The geophysical data did not record evidence of metallic USTs within the survey area at Parcel No. 68. Falcon does not anticipate USTs will be encountered within the project limits on this parcel during construction.

6.3 SAMPLING

Sampling results did not identify contaminants in the soil which require remediation in the areas sampled. Based on past project experience, Falcon does not anticipate soil remediation or special handling and disposal will be required during construction on this parcel.

6.4 QUANTITIES

Soils requiring quantities calculations were not identified.

SECTION 7: RECOMMENDATIONS

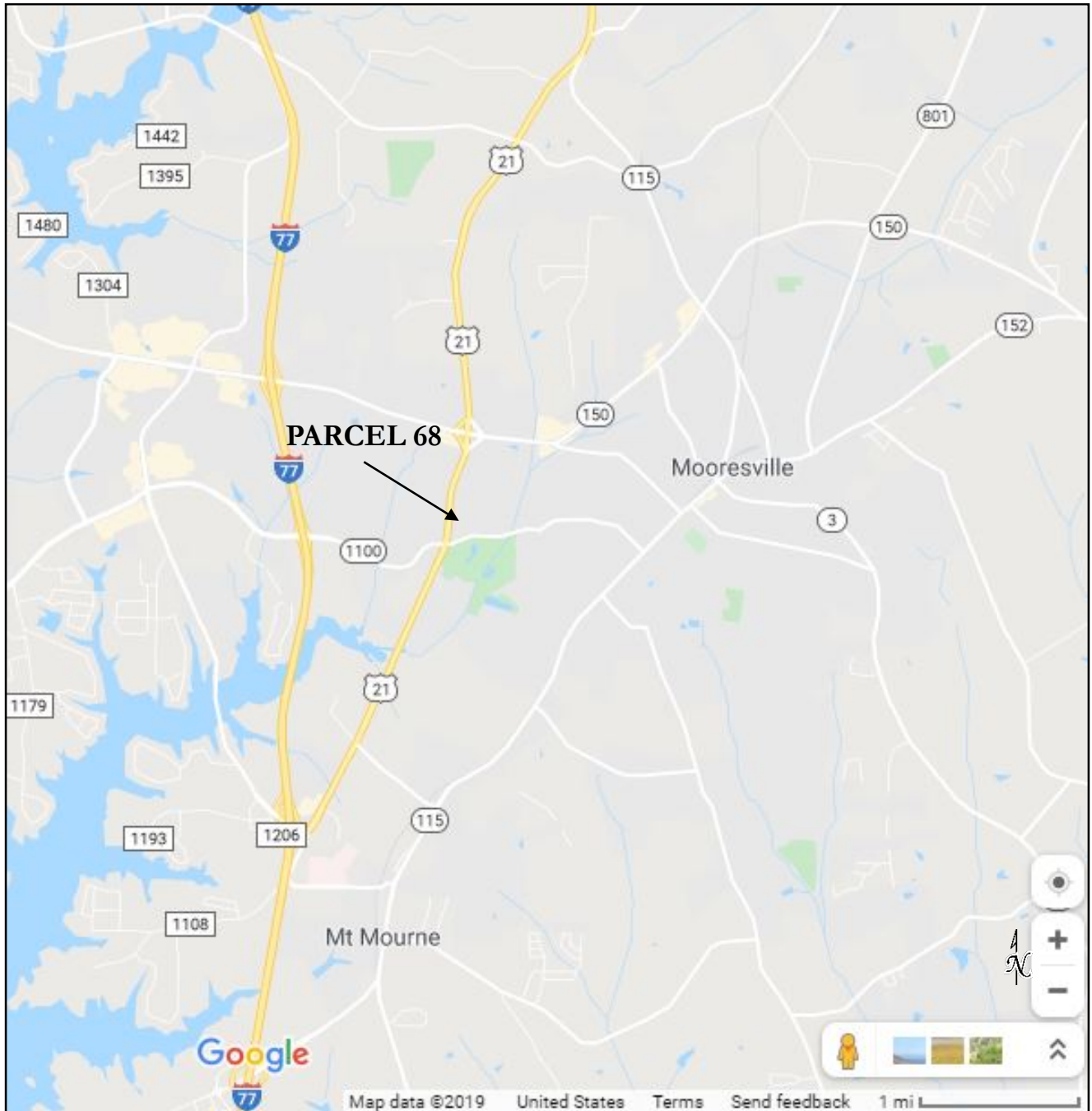
7.1 ADDITIONAL SAMPLING

Contaminants above the Industrial / Commercial Soil Cleanup Levels were not identified; therefore, additional assessment is not warranted at this time. Falcon recommends if drums, USTs, above ground storage tanks (ASTs), petroleum odors or sheen are observed during any excavation associated with any property involved in the project that all work in the vicinity stop until further assessment takes place. Further assessment can include but is not limited to; sampling the soil and groundwater, excavation, and proper handling and disposal of contaminated soils and groundwater.

7.2 SPECIAL HANDLING OF IMPACTED SOIL

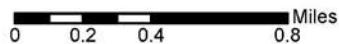
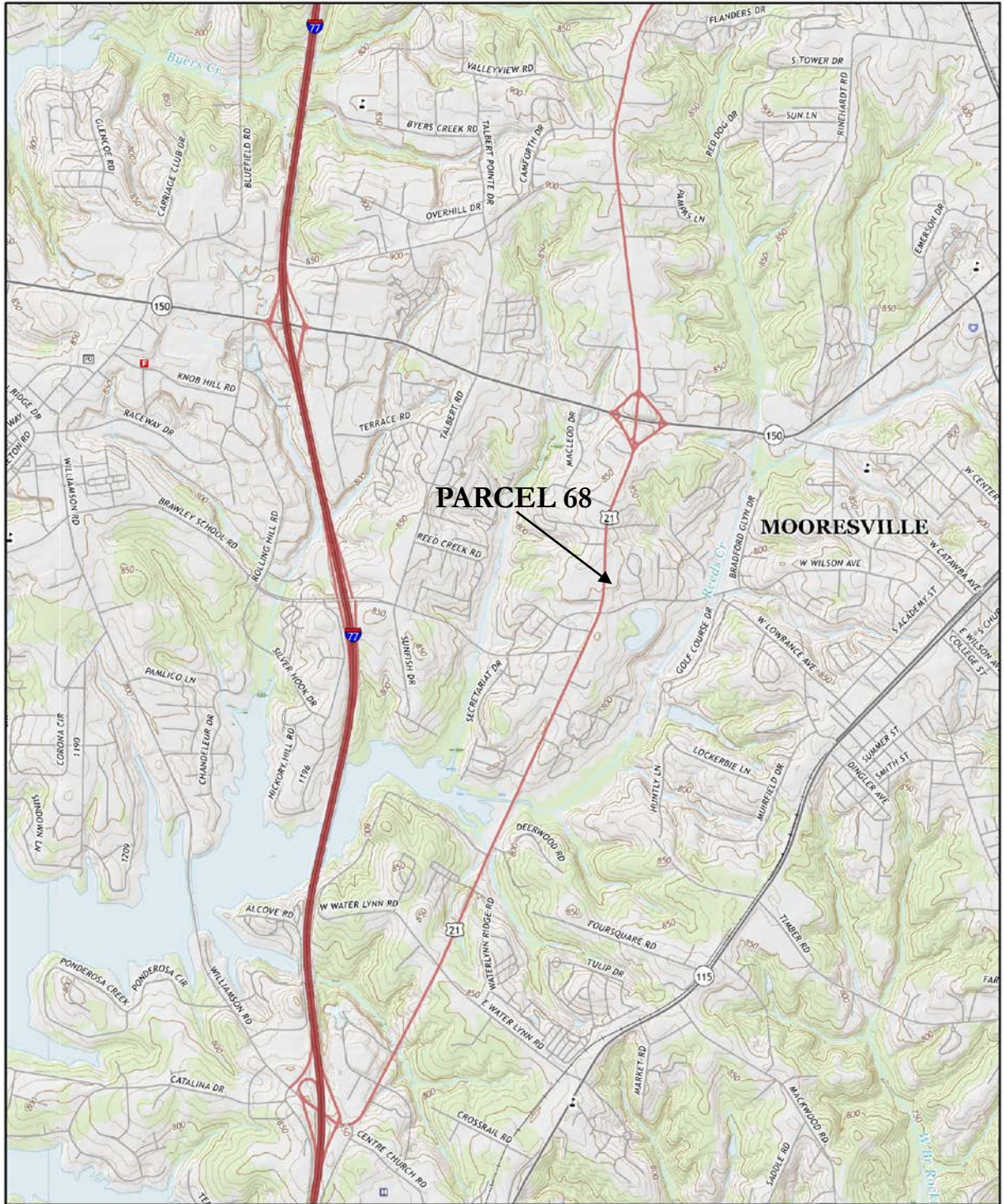
Soils requiring special handling were not identified. If suspect contaminated soils are encountered during construction Falcon and the NCDOT GeoEnvironmental Group should be contacted for proper handling instructions.

NCDOT R-3833C (SR 1100 Improvements)
Preliminary Site Assessment
Parcel 68 Vicinity Map



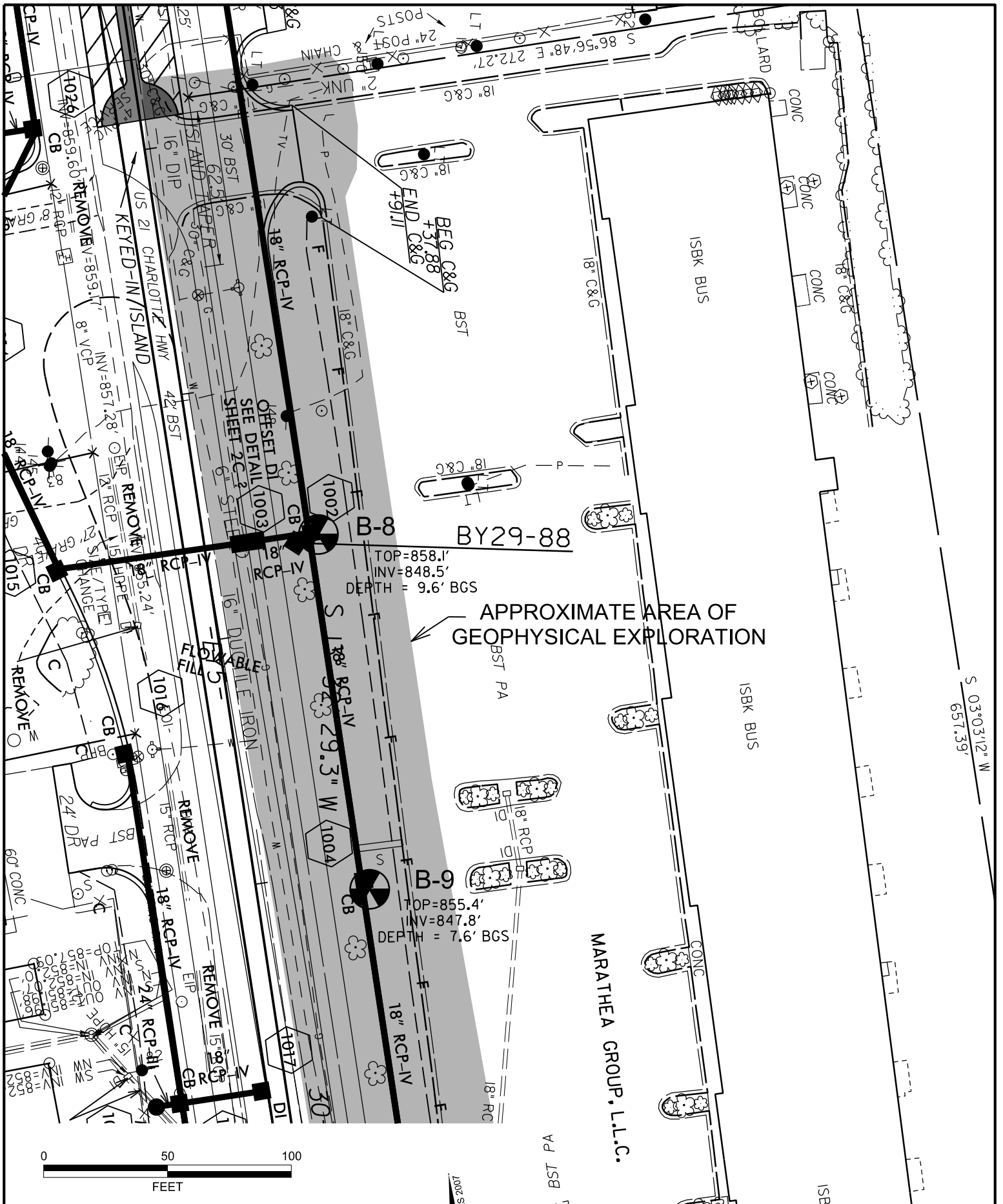
Project No.: G18063.02
Date: October 2019
Source: Google Maps

NCDOT R-3833C (SR 1100 Improvements) Preliminary Site Assessment Parcel 68 Topographic Map



Project No.: G18063.02
Date: October 2019
Source: "Mooresville, NC" 2016 USGS Topographic Map





NOTES:
 • BGS = BELOW GROUND SURFACE

FALCON ENGINEERING
 FALCON ENGINEERING, INC.
 1210 TRINITY ROAD, SUITE 110
 RALEIGH, NC 27607
 PHONE: 919.871.0800
 FAX: 919.871.0803

BORING LOCATION PLAN
 BRAWLEY SCHOOL ROAD
 PARCEL 68 - MARATHEA GROUP, LLC
 IREDELL / NORTH CAROLINA
 WBS NO.: 34554.2.4 | TIF NO.: R-3833C
 FALCON PROJECT NO. G18063.02

NCDOT R-3833C (SR 1100 Improvements)
Preliminary Site Assessment
Parcel 68 Site Photographs



Dry-cleaners

Photograph No. 1: General view of Boring B-08.



Photograph No. 2: General view of Boring B-09.

October 21, 2019

Christopher Burkhardt
Falcon Engineering
1210 Trinity Road
Suite 110
Cary, NC 27513

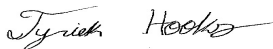
RE: Project: G18063
Pace Project No.: 92449737

Dear Christopher Burkhardt:

Enclosed are the analytical results for sample(s) received by the laboratory on October 15, 2019. The results relate only to the samples included in this report. Results reported herein conform to the most current, applicable TNI/NELAC standards and the laboratory's Quality Assurance Manual, where applicable, unless otherwise noted in the body of the report.

If you have any questions concerning this report, please feel free to contact me.

Sincerely,



Tyriek Hooks
tyriek.hooks@pacelabs.com
(704)875-9092
Project Manager

Enclosures

cc: Christopher Burkhardt, Falcon Engineering



REPORT OF LABORATORY ANALYSIS

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CERTIFICATIONS

Project: G18063
Pace Project No.: 92449737

Charlotte Certification IDs

9800 Kincey Ave. Ste 100, Huntersville, NC 28078
Louisiana/NELAP Certification # LA170028
North Carolina Drinking Water Certification #: 37706
North Carolina Field Services Certification #: 5342
North Carolina Wastewater Certification #: 12

South Carolina Certification #: 99006001
Florida/NELAP Certification #: E87627
Kentucky UST Certification #: 84
Virginia/VELAP Certification #: 460221

REPORT OF LABORATORY ANALYSIS

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SAMPLE ANALYTE COUNT

Project: G18063
Pace Project No.: 92449737

| Lab ID | Sample ID | Method | Analysts | Analytes Reported | Laboratory |
|-------------|-----------|---------------|----------|-------------------|------------|
| 92449737001 | B08 | EPA 8260D | CL | 70 | PASI-C |
| | | ASTM D2974-87 | KDF | 1 | PASI-C |
| 92449737002 | B09 | EPA 8260D | CL | 70 | PASI-C |
| | | ASTM D2974-87 | KDF | 1 | PASI-C |

REPORT OF LABORATORY ANALYSIS

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ANALYTICAL RESULTS

Project: G18063
Pace Project No.: 92449737

Sample: B08 **Lab ID: 92449737001** Collected: 10/15/19 10:49 Received: 10/15/19 16:39 Matrix: Solid

Results reported on a "dry weight" basis and are adjusted for percent moisture, sample size and any dilutions.

| Parameters | Results | Units | Report Limit | DF | Prepared | Analyzed | CAS No. | Qual |
|--------------------------------------|---------|---|--------------|----|----------------|----------------|------------|------|
| 8260D/5035A Volatile Organics | | Analytical Method: EPA 8260D Preparation Method: EPA 5035A | | | | | | |
| Acetone | ND | ug/kg | 114 | 1 | 10/18/19 12:39 | 10/18/19 15:12 | 67-64-1 | |
| Benzene | ND | ug/kg | 5.7 | 1 | 10/18/19 12:39 | 10/18/19 15:12 | 71-43-2 | |
| Bromobenzene | ND | ug/kg | 5.7 | 1 | 10/18/19 12:39 | 10/18/19 15:12 | 108-86-1 | |
| Bromochloromethane | ND | ug/kg | 5.7 | 1 | 10/18/19 12:39 | 10/18/19 15:12 | 74-97-5 | |
| Bromodichloromethane | ND | ug/kg | 5.7 | 1 | 10/18/19 12:39 | 10/18/19 15:12 | 75-27-4 | |
| Bromoform | ND | ug/kg | 5.7 | 1 | 10/18/19 12:39 | 10/18/19 15:12 | 75-25-2 | |
| Bromomethane | ND | ug/kg | 11.4 | 1 | 10/18/19 12:39 | 10/18/19 15:12 | 74-83-9 | |
| 2-Butanone (MEK) | ND | ug/kg | 114 | 1 | 10/18/19 12:39 | 10/18/19 15:12 | 78-93-3 | |
| n-Butylbenzene | ND | ug/kg | 5.7 | 1 | 10/18/19 12:39 | 10/18/19 15:12 | 104-51-8 | |
| sec-Butylbenzene | ND | ug/kg | 5.7 | 1 | 10/18/19 12:39 | 10/18/19 15:12 | 135-98-8 | |
| tert-Butylbenzene | ND | ug/kg | 5.7 | 1 | 10/18/19 12:39 | 10/18/19 15:12 | 98-06-6 | |
| Carbon tetrachloride | ND | ug/kg | 5.7 | 1 | 10/18/19 12:39 | 10/18/19 15:12 | 56-23-5 | |
| Chlorobenzene | ND | ug/kg | 5.7 | 1 | 10/18/19 12:39 | 10/18/19 15:12 | 108-90-7 | |
| Chloroethane | ND | ug/kg | 11.4 | 1 | 10/18/19 12:39 | 10/18/19 15:12 | 75-00-3 | |
| Chloroform | ND | ug/kg | 5.7 | 1 | 10/18/19 12:39 | 10/18/19 15:12 | 67-66-3 | |
| Chloromethane | ND | ug/kg | 11.4 | 1 | 10/18/19 12:39 | 10/18/19 15:12 | 74-87-3 | |
| 2-Chlorotoluene | ND | ug/kg | 5.7 | 1 | 10/18/19 12:39 | 10/18/19 15:12 | 95-49-8 | |
| 4-Chlorotoluene | ND | ug/kg | 5.7 | 1 | 10/18/19 12:39 | 10/18/19 15:12 | 106-43-4 | |
| 1,2-Dibromo-3-chloropropane | ND | ug/kg | 5.7 | 1 | 10/18/19 12:39 | 10/18/19 15:12 | 96-12-8 | |
| Dibromochloromethane | ND | ug/kg | 5.7 | 1 | 10/18/19 12:39 | 10/18/19 15:12 | 124-48-1 | |
| 1,2-Dibromoethane (EDB) | ND | ug/kg | 5.7 | 1 | 10/18/19 12:39 | 10/18/19 15:12 | 106-93-4 | |
| Dibromomethane | ND | ug/kg | 5.7 | 1 | 10/18/19 12:39 | 10/18/19 15:12 | 74-95-3 | |
| 1,2-Dichlorobenzene | ND | ug/kg | 5.7 | 1 | 10/18/19 12:39 | 10/18/19 15:12 | 95-50-1 | |
| 1,3-Dichlorobenzene | ND | ug/kg | 5.7 | 1 | 10/18/19 12:39 | 10/18/19 15:12 | 541-73-1 | |
| 1,4-Dichlorobenzene | ND | ug/kg | 5.7 | 1 | 10/18/19 12:39 | 10/18/19 15:12 | 106-46-7 | |
| Dichlorodifluoromethane | ND | ug/kg | 11.4 | 1 | 10/18/19 12:39 | 10/18/19 15:12 | 75-71-8 | |
| 1,1-Dichloroethane | ND | ug/kg | 5.7 | 1 | 10/18/19 12:39 | 10/18/19 15:12 | 75-34-3 | |
| 1,2-Dichloroethane | ND | ug/kg | 5.7 | 1 | 10/18/19 12:39 | 10/18/19 15:12 | 107-06-2 | |
| 1,1-Dichloroethene | ND | ug/kg | 5.7 | 1 | 10/18/19 12:39 | 10/18/19 15:12 | 75-35-4 | |
| cis-1,2-Dichloroethene | ND | ug/kg | 5.7 | 1 | 10/18/19 12:39 | 10/18/19 15:12 | 156-59-2 | |
| trans-1,2-Dichloroethene | ND | ug/kg | 5.7 | 1 | 10/18/19 12:39 | 10/18/19 15:12 | 156-60-5 | |
| 1,2-Dichloropropane | ND | ug/kg | 5.7 | 1 | 10/18/19 12:39 | 10/18/19 15:12 | 78-87-5 | |
| 1,3-Dichloropropane | ND | ug/kg | 5.7 | 1 | 10/18/19 12:39 | 10/18/19 15:12 | 142-28-9 | |
| 2,2-Dichloropropane | ND | ug/kg | 5.7 | 1 | 10/18/19 12:39 | 10/18/19 15:12 | 594-20-7 | |
| 1,1-Dichloropropene | ND | ug/kg | 5.7 | 1 | 10/18/19 12:39 | 10/18/19 15:12 | 563-58-6 | |
| cis-1,3-Dichloropropene | ND | ug/kg | 5.7 | 1 | 10/18/19 12:39 | 10/18/19 15:12 | 10061-01-5 | |
| trans-1,3-Dichloropropene | ND | ug/kg | 5.7 | 1 | 10/18/19 12:39 | 10/18/19 15:12 | 10061-02-6 | |
| Diisopropyl ether | ND | ug/kg | 5.7 | 1 | 10/18/19 12:39 | 10/18/19 15:12 | 108-20-3 | |
| Ethylbenzene | ND | ug/kg | 5.7 | 1 | 10/18/19 12:39 | 10/18/19 15:12 | 100-41-4 | |
| Hexachloro-1,3-butadiene | ND | ug/kg | 5.7 | 1 | 10/18/19 12:39 | 10/18/19 15:12 | 87-68-3 | |
| 2-Hexanone | ND | ug/kg | 57.1 | 1 | 10/18/19 12:39 | 10/18/19 15:12 | 591-78-6 | |
| Isopropylbenzene (Cumene) | ND | ug/kg | 5.7 | 1 | 10/18/19 12:39 | 10/18/19 15:12 | 98-82-8 | |
| p-Isopropyltoluene | ND | ug/kg | 5.7 | 1 | 10/18/19 12:39 | 10/18/19 15:12 | 99-87-6 | |
| Methylene Chloride | ND | ug/kg | 22.9 | 1 | 10/18/19 12:39 | 10/18/19 15:12 | 75-09-2 | |
| 4-Methyl-2-pentanone (MIBK) | ND | ug/kg | 57.1 | 1 | 10/18/19 12:39 | 10/18/19 15:12 | 108-10-1 | |
| Methyl-tert-butyl ether | ND | ug/kg | 5.7 | 1 | 10/18/19 12:39 | 10/18/19 15:12 | 1634-04-4 | |

REPORT OF LABORATORY ANALYSIS

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ANALYTICAL RESULTS

Project: G18063
Pace Project No.: 92449737

Sample: B08 **Lab ID: 92449737001** Collected: 10/15/19 10:49 Received: 10/15/19 16:39 Matrix: Solid

Results reported on a "dry weight" basis and are adjusted for percent moisture, sample size and any dilutions.

| Parameters | Results | Units | Report Limit | DF | Prepared | Analyzed | CAS No. | Qual |
|--------------------------------------|---------|---|--------------|----|----------------|----------------|-------------|-------|
| 8260D/5035A Volatile Organics | | Analytical Method: EPA 8260D Preparation Method: EPA 5035A | | | | | | |
| Naphthalene | ND | ug/kg | 5.7 | 1 | 10/18/19 12:39 | 10/18/19 15:12 | 91-20-3 | |
| n-Propylbenzene | ND | ug/kg | 5.7 | 1 | 10/18/19 12:39 | 10/18/19 15:12 | 103-65-1 | |
| Styrene | ND | ug/kg | 5.7 | 1 | 10/18/19 12:39 | 10/18/19 15:12 | 100-42-5 | |
| 1,1,1,2-Tetrachloroethane | ND | ug/kg | 5.7 | 1 | 10/18/19 12:39 | 10/18/19 15:12 | 630-20-6 | |
| 1,1,2,2-Tetrachloroethane | ND | ug/kg | 5.7 | 1 | 10/18/19 12:39 | 10/18/19 15:12 | 79-34-5 | |
| Tetrachloroethene | ND | ug/kg | 5.7 | 1 | 10/18/19 12:39 | 10/18/19 15:12 | 127-18-4 | |
| Toluene | ND | ug/kg | 5.7 | 1 | 10/18/19 12:39 | 10/18/19 15:12 | 108-88-3 | |
| 1,2,3-Trichlorobenzene | ND | ug/kg | 5.7 | 1 | 10/18/19 12:39 | 10/18/19 15:12 | 87-61-6 | |
| 1,2,4-Trichlorobenzene | ND | ug/kg | 5.7 | 1 | 10/18/19 12:39 | 10/18/19 15:12 | 120-82-1 | |
| 1,1,1-Trichloroethane | ND | ug/kg | 5.7 | 1 | 10/18/19 12:39 | 10/18/19 15:12 | 71-55-6 | |
| 1,1,2-Trichloroethane | ND | ug/kg | 5.7 | 1 | 10/18/19 12:39 | 10/18/19 15:12 | 79-00-5 | |
| Trichloroethene | ND | ug/kg | 5.7 | 1 | 10/18/19 12:39 | 10/18/19 15:12 | 79-01-6 | |
| Trichlorofluoromethane | ND | ug/kg | 5.7 | 1 | 10/18/19 12:39 | 10/18/19 15:12 | 75-69-4 | |
| 1,2,3-Trichloropropane | ND | ug/kg | 5.7 | 1 | 10/18/19 12:39 | 10/18/19 15:12 | 96-18-4 | |
| 1,2,4-Trimethylbenzene | ND | ug/kg | 5.7 | 1 | 10/18/19 12:39 | 10/18/19 15:12 | 95-63-6 | |
| 1,3,5-Trimethylbenzene | ND | ug/kg | 5.7 | 1 | 10/18/19 12:39 | 10/18/19 15:12 | 108-67-8 | |
| Vinyl acetate | ND | ug/kg | 57.1 | 1 | 10/18/19 12:39 | 10/18/19 15:12 | 108-05-4 | L1,v1 |
| Vinyl chloride | ND | ug/kg | 11.4 | 1 | 10/18/19 12:39 | 10/18/19 15:12 | 75-01-4 | |
| Xylene (Total) | ND | ug/kg | 11.4 | 1 | 10/18/19 12:39 | 10/18/19 15:12 | 1330-20-7 | |
| m&p-Xylene | ND | ug/kg | 11.4 | 1 | 10/18/19 12:39 | 10/18/19 15:12 | 179601-23-1 | |
| o-Xylene | ND | ug/kg | 5.7 | 1 | 10/18/19 12:39 | 10/18/19 15:12 | 95-47-6 | |
| Surrogates | | | | | | | | |
| Toluene-d8 (S) | 103 | % | 70-130 | 1 | 10/18/19 12:39 | 10/18/19 15:12 | 2037-26-5 | |
| 4-Bromofluorobenzene (S) | 101 | % | 70-130 | 1 | 10/18/19 12:39 | 10/18/19 15:12 | 460-00-4 | |
| 1,2-Dichloroethane-d4 (S) | 108 | % | 70-132 | 1 | 10/18/19 12:39 | 10/18/19 15:12 | 17060-07-0 | |

Percent Moisture Analytical Method: ASTM D2974-87

Percent Moisture **14.2** % 0.10 1 10/17/19 13:29

Sample: B09 **Lab ID: 92449737002** Collected: 10/15/19 10:21 Received: 10/15/19 16:39 Matrix: Solid

Results reported on a "dry weight" basis and are adjusted for percent moisture, sample size and any dilutions.

| Parameters | Results | Units | Report Limit | DF | Prepared | Analyzed | CAS No. | Qual |
|--------------------------------------|---------|---|--------------|----|----------------|----------------|----------|------|
| 8260D/5035A Volatile Organics | | Analytical Method: EPA 8260D Preparation Method: EPA 5035A | | | | | | |
| Acetone | ND | ug/kg | 104 | 1 | 10/18/19 12:39 | 10/18/19 15:37 | 67-64-1 | |
| Benzene | ND | ug/kg | 5.2 | 1 | 10/18/19 12:39 | 10/18/19 15:37 | 71-43-2 | |
| Bromobenzene | ND | ug/kg | 5.2 | 1 | 10/18/19 12:39 | 10/18/19 15:37 | 108-86-1 | |
| Bromochloromethane | ND | ug/kg | 5.2 | 1 | 10/18/19 12:39 | 10/18/19 15:37 | 74-97-5 | |
| Bromodichloromethane | ND | ug/kg | 5.2 | 1 | 10/18/19 12:39 | 10/18/19 15:37 | 75-27-4 | |
| Bromoform | ND | ug/kg | 5.2 | 1 | 10/18/19 12:39 | 10/18/19 15:37 | 75-25-2 | |
| Bromomethane | ND | ug/kg | 10.4 | 1 | 10/18/19 12:39 | 10/18/19 15:37 | 74-83-9 | |
| 2-Butanone (MEK) | ND | ug/kg | 104 | 1 | 10/18/19 12:39 | 10/18/19 15:37 | 78-93-3 | |
| n-Butylbenzene | ND | ug/kg | 5.2 | 1 | 10/18/19 12:39 | 10/18/19 15:37 | 104-51-8 | |
| sec-Butylbenzene | ND | ug/kg | 5.2 | 1 | 10/18/19 12:39 | 10/18/19 15:37 | 135-98-8 | |

REPORT OF LABORATORY ANALYSIS

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ANALYTICAL RESULTS

Project: G18063
Pace Project No.: 92449737

Sample: B09 **Lab ID: 92449737002** Collected: 10/15/19 10:21 Received: 10/15/19 16:39 Matrix: Solid

Results reported on a "dry weight" basis and are adjusted for percent moisture, sample size and any dilutions.

| Parameters | Results | Units | Report Limit | DF | Prepared | Analyzed | CAS No. | Qual |
|--------------------------------------|---------|---|--------------|----|----------------|----------------|------------|------|
| 8260D/5035A Volatile Organics | | Analytical Method: EPA 8260D Preparation Method: EPA 5035A | | | | | | |
| tert-Butylbenzene | ND | ug/kg | 5.2 | 1 | 10/18/19 12:39 | 10/18/19 15:37 | 98-06-6 | |
| Carbon tetrachloride | ND | ug/kg | 5.2 | 1 | 10/18/19 12:39 | 10/18/19 15:37 | 56-23-5 | |
| Chlorobenzene | ND | ug/kg | 5.2 | 1 | 10/18/19 12:39 | 10/18/19 15:37 | 108-90-7 | |
| Chloroethane | ND | ug/kg | 10.4 | 1 | 10/18/19 12:39 | 10/18/19 15:37 | 75-00-3 | |
| Chloroform | ND | ug/kg | 5.2 | 1 | 10/18/19 12:39 | 10/18/19 15:37 | 67-66-3 | |
| Chloromethane | ND | ug/kg | 10.4 | 1 | 10/18/19 12:39 | 10/18/19 15:37 | 74-87-3 | |
| 2-Chlorotoluene | ND | ug/kg | 5.2 | 1 | 10/18/19 12:39 | 10/18/19 15:37 | 95-49-8 | |
| 4-Chlorotoluene | ND | ug/kg | 5.2 | 1 | 10/18/19 12:39 | 10/18/19 15:37 | 106-43-4 | |
| 1,2-Dibromo-3-chloropropane | ND | ug/kg | 5.2 | 1 | 10/18/19 12:39 | 10/18/19 15:37 | 96-12-8 | |
| Dibromochloromethane | ND | ug/kg | 5.2 | 1 | 10/18/19 12:39 | 10/18/19 15:37 | 124-48-1 | |
| 1,2-Dibromoethane (EDB) | ND | ug/kg | 5.2 | 1 | 10/18/19 12:39 | 10/18/19 15:37 | 106-93-4 | |
| Dibromomethane | ND | ug/kg | 5.2 | 1 | 10/18/19 12:39 | 10/18/19 15:37 | 74-95-3 | |
| 1,2-Dichlorobenzene | ND | ug/kg | 5.2 | 1 | 10/18/19 12:39 | 10/18/19 15:37 | 95-50-1 | |
| 1,3-Dichlorobenzene | ND | ug/kg | 5.2 | 1 | 10/18/19 12:39 | 10/18/19 15:37 | 541-73-1 | |
| 1,4-Dichlorobenzene | ND | ug/kg | 5.2 | 1 | 10/18/19 12:39 | 10/18/19 15:37 | 106-46-7 | |
| Dichlorodifluoromethane | ND | ug/kg | 10.4 | 1 | 10/18/19 12:39 | 10/18/19 15:37 | 75-71-8 | |
| 1,1-Dichloroethane | ND | ug/kg | 5.2 | 1 | 10/18/19 12:39 | 10/18/19 15:37 | 75-34-3 | |
| 1,2-Dichloroethane | ND | ug/kg | 5.2 | 1 | 10/18/19 12:39 | 10/18/19 15:37 | 107-06-2 | |
| 1,1-Dichloroethene | ND | ug/kg | 5.2 | 1 | 10/18/19 12:39 | 10/18/19 15:37 | 75-35-4 | |
| cis-1,2-Dichloroethene | ND | ug/kg | 5.2 | 1 | 10/18/19 12:39 | 10/18/19 15:37 | 156-59-2 | |
| trans-1,2-Dichloroethene | ND | ug/kg | 5.2 | 1 | 10/18/19 12:39 | 10/18/19 15:37 | 156-60-5 | |
| 1,2-Dichloropropane | ND | ug/kg | 5.2 | 1 | 10/18/19 12:39 | 10/18/19 15:37 | 78-87-5 | |
| 1,3-Dichloropropane | ND | ug/kg | 5.2 | 1 | 10/18/19 12:39 | 10/18/19 15:37 | 142-28-9 | |
| 2,2-Dichloropropane | ND | ug/kg | 5.2 | 1 | 10/18/19 12:39 | 10/18/19 15:37 | 594-20-7 | |
| 1,1-Dichloropropene | ND | ug/kg | 5.2 | 1 | 10/18/19 12:39 | 10/18/19 15:37 | 563-58-6 | |
| cis-1,3-Dichloropropene | ND | ug/kg | 5.2 | 1 | 10/18/19 12:39 | 10/18/19 15:37 | 10061-01-5 | |
| trans-1,3-Dichloropropene | ND | ug/kg | 5.2 | 1 | 10/18/19 12:39 | 10/18/19 15:37 | 10061-02-6 | |
| Diisopropyl ether | ND | ug/kg | 5.2 | 1 | 10/18/19 12:39 | 10/18/19 15:37 | 108-20-3 | |
| Ethylbenzene | ND | ug/kg | 5.2 | 1 | 10/18/19 12:39 | 10/18/19 15:37 | 100-41-4 | |
| Hexachloro-1,3-butadiene | ND | ug/kg | 5.2 | 1 | 10/18/19 12:39 | 10/18/19 15:37 | 87-68-3 | |
| 2-Hexanone | ND | ug/kg | 52.2 | 1 | 10/18/19 12:39 | 10/18/19 15:37 | 591-78-6 | |
| Isopropylbenzene (Cumene) | ND | ug/kg | 5.2 | 1 | 10/18/19 12:39 | 10/18/19 15:37 | 98-82-8 | |
| p-Isopropyltoluene | ND | ug/kg | 5.2 | 1 | 10/18/19 12:39 | 10/18/19 15:37 | 99-87-6 | |
| Methylene Chloride | ND | ug/kg | 20.9 | 1 | 10/18/19 12:39 | 10/18/19 15:37 | 75-09-2 | |
| 4-Methyl-2-pentanone (MIBK) | ND | ug/kg | 52.2 | 1 | 10/18/19 12:39 | 10/18/19 15:37 | 108-10-1 | |
| Methyl-tert-butyl ether | ND | ug/kg | 5.2 | 1 | 10/18/19 12:39 | 10/18/19 15:37 | 1634-04-4 | |
| Naphthalene | ND | ug/kg | 5.2 | 1 | 10/18/19 12:39 | 10/18/19 15:37 | 91-20-3 | |
| n-Propylbenzene | ND | ug/kg | 5.2 | 1 | 10/18/19 12:39 | 10/18/19 15:37 | 103-65-1 | |
| Styrene | ND | ug/kg | 5.2 | 1 | 10/18/19 12:39 | 10/18/19 15:37 | 100-42-5 | |
| 1,1,1,2-Tetrachloroethane | ND | ug/kg | 5.2 | 1 | 10/18/19 12:39 | 10/18/19 15:37 | 630-20-6 | |
| 1,1,2,2-Tetrachloroethane | ND | ug/kg | 5.2 | 1 | 10/18/19 12:39 | 10/18/19 15:37 | 79-34-5 | |
| Tetrachloroethene | ND | ug/kg | 5.2 | 1 | 10/18/19 12:39 | 10/18/19 15:37 | 127-18-4 | |
| Toluene | ND | ug/kg | 5.2 | 1 | 10/18/19 12:39 | 10/18/19 15:37 | 108-88-3 | |
| 1,2,3-Trichlorobenzene | ND | ug/kg | 5.2 | 1 | 10/18/19 12:39 | 10/18/19 15:37 | 87-61-6 | |
| 1,2,4-Trichlorobenzene | ND | ug/kg | 5.2 | 1 | 10/18/19 12:39 | 10/18/19 15:37 | 120-82-1 | |
| 1,1,1-Trichloroethane | ND | ug/kg | 5.2 | 1 | 10/18/19 12:39 | 10/18/19 15:37 | 71-55-6 | |

REPORT OF LABORATORY ANALYSIS

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ANALYTICAL RESULTS

Project: G18063
Pace Project No.: 92449737

Sample: B09 **Lab ID: 92449737002** Collected: 10/15/19 10:21 Received: 10/15/19 16:39 Matrix: Solid

Results reported on a "dry weight" basis and are adjusted for percent moisture, sample size and any dilutions.

| Parameters | Results | Units | Report Limit | DF | Prepared | Analyzed | CAS No. | Qual |
|--------------------------------------|-------------|---|--------------|----|----------------|----------------|-------------|-------|
| 8260D/5035A Volatile Organics | | Analytical Method: EPA 8260D Preparation Method: EPA 5035A | | | | | | |
| 1,1,2-Trichloroethane | ND | ug/kg | 5.2 | 1 | 10/18/19 12:39 | 10/18/19 15:37 | 79-00-5 | |
| Trichloroethene | ND | ug/kg | 5.2 | 1 | 10/18/19 12:39 | 10/18/19 15:37 | 79-01-6 | |
| Trichlorofluoromethane | ND | ug/kg | 5.2 | 1 | 10/18/19 12:39 | 10/18/19 15:37 | 75-69-4 | |
| 1,2,3-Trichloropropane | ND | ug/kg | 5.2 | 1 | 10/18/19 12:39 | 10/18/19 15:37 | 96-18-4 | |
| 1,2,4-Trimethylbenzene | ND | ug/kg | 5.2 | 1 | 10/18/19 12:39 | 10/18/19 15:37 | 95-63-6 | |
| 1,3,5-Trimethylbenzene | ND | ug/kg | 5.2 | 1 | 10/18/19 12:39 | 10/18/19 15:37 | 108-67-8 | |
| Vinyl acetate | ND | ug/kg | 52.2 | 1 | 10/18/19 12:39 | 10/18/19 15:37 | 108-05-4 | L1,v1 |
| Vinyl chloride | ND | ug/kg | 10.4 | 1 | 10/18/19 12:39 | 10/18/19 15:37 | 75-01-4 | |
| Xylene (Total) | ND | ug/kg | 10.4 | 1 | 10/18/19 12:39 | 10/18/19 15:37 | 1330-20-7 | |
| m&p-Xylene | ND | ug/kg | 10.4 | 1 | 10/18/19 12:39 | 10/18/19 15:37 | 179601-23-1 | |
| o-Xylene | ND | ug/kg | 5.2 | 1 | 10/18/19 12:39 | 10/18/19 15:37 | 95-47-6 | |
| Surrogates | | | | | | | | |
| Toluene-d8 (S) | 110 | % | 70-130 | 1 | 10/18/19 12:39 | 10/18/19 15:37 | 2037-26-5 | |
| 4-Bromofluorobenzene (S) | 104 | % | 70-130 | 1 | 10/18/19 12:39 | 10/18/19 15:37 | 460-00-4 | |
| 1,2-Dichloroethane-d4 (S) | 109 | % | 70-132 | 1 | 10/18/19 12:39 | 10/18/19 15:37 | 17060-07-0 | |
| Percent Moisture | | Analytical Method: ASTM D2974-87 | | | | | | |
| Percent Moisture | 13.9 | % | 0.10 | 1 | | 10/17/19 13:30 | | |

REPORT OF LABORATORY ANALYSIS

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QUALITY CONTROL DATA

Project: G18063
Pace Project No.: 92449737

QC Batch: 504508 Analysis Method: EPA 8260D
QC Batch Method: EPA 5035A Analysis Description: 8260D MSV 5035A Volatile Organics
Associated Lab Samples: 92449737001, 92449737002

METHOD BLANK: 2711188 Matrix: Solid
Associated Lab Samples: 92449737001, 92449737002

| Parameter | Units | Blank Result | Reporting Limit | Analyzed | Qualifiers |
|-----------------------------|-------|--------------|-----------------|----------------|------------|
| 1,1,1,2-Tetrachloroethane | ug/kg | ND | 5.0 | 10/18/19 14:48 | |
| 1,1,1-Trichloroethane | ug/kg | ND | 5.0 | 10/18/19 14:48 | |
| 1,1,2,2-Tetrachloroethane | ug/kg | ND | 5.0 | 10/18/19 14:48 | |
| 1,1,2-Trichloroethane | ug/kg | ND | 5.0 | 10/18/19 14:48 | |
| 1,1-Dichloroethane | ug/kg | ND | 5.0 | 10/18/19 14:48 | |
| 1,1-Dichloroethene | ug/kg | ND | 5.0 | 10/18/19 14:48 | |
| 1,1-Dichloropropene | ug/kg | ND | 5.0 | 10/18/19 14:48 | |
| 1,2,3-Trichlorobenzene | ug/kg | ND | 5.0 | 10/18/19 14:48 | |
| 1,2,3-Trichloropropane | ug/kg | ND | 5.0 | 10/18/19 14:48 | |
| 1,2,4-Trichlorobenzene | ug/kg | ND | 5.0 | 10/18/19 14:48 | |
| 1,2,4-Trimethylbenzene | ug/kg | ND | 5.0 | 10/18/19 14:48 | |
| 1,2-Dibromo-3-chloropropane | ug/kg | ND | 5.0 | 10/18/19 14:48 | |
| 1,2-Dibromoethane (EDB) | ug/kg | ND | 5.0 | 10/18/19 14:48 | |
| 1,2-Dichlorobenzene | ug/kg | ND | 5.0 | 10/18/19 14:48 | |
| 1,2-Dichloroethane | ug/kg | ND | 5.0 | 10/18/19 14:48 | |
| 1,2-Dichloropropane | ug/kg | ND | 5.0 | 10/18/19 14:48 | |
| 1,3,5-Trimethylbenzene | ug/kg | ND | 5.0 | 10/18/19 14:48 | |
| 1,3-Dichlorobenzene | ug/kg | ND | 5.0 | 10/18/19 14:48 | |
| 1,3-Dichloropropane | ug/kg | ND | 5.0 | 10/18/19 14:48 | |
| 1,4-Dichlorobenzene | ug/kg | ND | 5.0 | 10/18/19 14:48 | |
| 2,2-Dichloropropane | ug/kg | ND | 5.0 | 10/18/19 14:48 | |
| 2-Butanone (MEK) | ug/kg | ND | 100 | 10/18/19 14:48 | |
| 2-Chlorotoluene | ug/kg | ND | 5.0 | 10/18/19 14:48 | |
| 2-Hexanone | ug/kg | ND | 50.0 | 10/18/19 14:48 | |
| 4-Chlorotoluene | ug/kg | ND | 5.0 | 10/18/19 14:48 | |
| 4-Methyl-2-pentanone (MIBK) | ug/kg | ND | 50.0 | 10/18/19 14:48 | |
| Acetone | ug/kg | ND | 100 | 10/18/19 14:48 | |
| Benzene | ug/kg | ND | 5.0 | 10/18/19 14:48 | |
| Bromobenzene | ug/kg | ND | 5.0 | 10/18/19 14:48 | |
| Bromochloromethane | ug/kg | ND | 5.0 | 10/18/19 14:48 | |
| Bromodichloromethane | ug/kg | ND | 5.0 | 10/18/19 14:48 | |
| Bromoform | ug/kg | ND | 5.0 | 10/18/19 14:48 | |
| Bromomethane | ug/kg | ND | 10.0 | 10/18/19 14:48 | |
| Carbon tetrachloride | ug/kg | ND | 5.0 | 10/18/19 14:48 | |
| Chlorobenzene | ug/kg | ND | 5.0 | 10/18/19 14:48 | |
| Chloroethane | ug/kg | ND | 10.0 | 10/18/19 14:48 | |
| Chloroform | ug/kg | ND | 5.0 | 10/18/19 14:48 | |
| Chloromethane | ug/kg | ND | 10.0 | 10/18/19 14:48 | |
| cis-1,2-Dichloroethene | ug/kg | ND | 5.0 | 10/18/19 14:48 | |
| cis-1,3-Dichloropropene | ug/kg | ND | 5.0 | 10/18/19 14:48 | |
| Dibromochloromethane | ug/kg | ND | 5.0 | 10/18/19 14:48 | |

Results presented on this page are in the units indicated by the "Units" column except where an alternate unit is presented to the right of the result.

REPORT OF LABORATORY ANALYSIS

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QUALITY CONTROL DATA

Project: G18063
Pace Project No.: 92449737

METHOD BLANK: 2711188 Matrix: Solid

Associated Lab Samples: 92449737001, 92449737002

| Parameter | Units | Blank Result | Reporting Limit | Analyzed | Qualifiers |
|---------------------------|-------|--------------|-----------------|----------------|------------|
| Dibromomethane | ug/kg | ND | 5.0 | 10/18/19 14:48 | |
| Dichlorodifluoromethane | ug/kg | ND | 10.0 | 10/18/19 14:48 | |
| Diisopropyl ether | ug/kg | ND | 5.0 | 10/18/19 14:48 | |
| Ethylbenzene | ug/kg | ND | 5.0 | 10/18/19 14:48 | |
| Hexachloro-1,3-butadiene | ug/kg | ND | 5.0 | 10/18/19 14:48 | |
| Isopropylbenzene (Cumene) | ug/kg | ND | 5.0 | 10/18/19 14:48 | |
| m&p-Xylene | ug/kg | ND | 10.0 | 10/18/19 14:48 | |
| Methyl-tert-butyl ether | ug/kg | ND | 5.0 | 10/18/19 14:48 | |
| Methylene Chloride | ug/kg | ND | 20.0 | 10/18/19 14:48 | |
| n-Butylbenzene | ug/kg | ND | 5.0 | 10/18/19 14:48 | |
| n-Propylbenzene | ug/kg | ND | 5.0 | 10/18/19 14:48 | |
| Naphthalene | ug/kg | ND | 5.0 | 10/18/19 14:48 | |
| o-Xylene | ug/kg | ND | 5.0 | 10/18/19 14:48 | |
| p-Isopropyltoluene | ug/kg | ND | 5.0 | 10/18/19 14:48 | |
| sec-Butylbenzene | ug/kg | ND | 5.0 | 10/18/19 14:48 | |
| Styrene | ug/kg | ND | 5.0 | 10/18/19 14:48 | |
| tert-Butylbenzene | ug/kg | ND | 5.0 | 10/18/19 14:48 | |
| Tetrachloroethene | ug/kg | ND | 5.0 | 10/18/19 14:48 | |
| Toluene | ug/kg | ND | 5.0 | 10/18/19 14:48 | |
| trans-1,2-Dichloroethene | ug/kg | ND | 5.0 | 10/18/19 14:48 | |
| trans-1,3-Dichloropropene | ug/kg | ND | 5.0 | 10/18/19 14:48 | |
| Trichloroethene | ug/kg | ND | 5.0 | 10/18/19 14:48 | |
| Trichlorofluoromethane | ug/kg | ND | 5.0 | 10/18/19 14:48 | |
| Vinyl acetate | ug/kg | ND | 50.0 | 10/18/19 14:48 | v1 |
| Vinyl chloride | ug/kg | ND | 10.0 | 10/18/19 14:48 | |
| Xylene (Total) | ug/kg | ND | 10.0 | 10/18/19 14:48 | |
| 1,2-Dichloroethane-d4 (S) | % | 97 | 70-132 | 10/18/19 14:48 | |
| 4-Bromofluorobenzene (S) | % | 101 | 70-130 | 10/18/19 14:48 | |
| Toluene-d8 (S) | % | 111 | 70-130 | 10/18/19 14:48 | |

LABORATORY CONTROL SAMPLE: 2711189

| Parameter | Units | Spike Conc. | LCS Result | LCS % Rec | % Rec Limits | Qualifiers |
|---------------------------|-------|-------------|------------|-----------|--------------|------------|
| 1,1,1,2-Tetrachloroethane | ug/kg | 50 | 53.7 | 107 | 70-130 | |
| 1,1,1-Trichloroethane | ug/kg | 50 | 52.5 | 105 | 70-130 | |
| 1,1,2,2-Tetrachloroethane | ug/kg | 50 | 50.6 | 101 | 55-130 | |
| 1,1,2-Trichloroethane | ug/kg | 50 | 52.1 | 104 | 70-130 | |
| 1,1-Dichloroethane | ug/kg | 50 | 53.0 | 106 | 68-130 | |
| 1,1-Dichloroethene | ug/kg | 50 | 56.2 | 112 | 70-130 | |
| 1,1-Dichloropropene | ug/kg | 50 | 49.3 | 99 | 70-130 | |
| 1,2,3-Trichlorobenzene | ug/kg | 50 | 53.7 | 107 | 70-130 | |
| 1,2,3-Trichloropropane | ug/kg | 50 | 55.4 | 111 | 70-130 | |
| 1,2,4-Trichlorobenzene | ug/kg | 50 | 53.3 | 107 | 70-130 | |
| 1,2,4-Trimethylbenzene | ug/kg | 50 | 51.3 | 103 | 69-130 | |

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REPORT OF LABORATORY ANALYSIS

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QUALITY CONTROL DATA

Project: G18063
Pace Project No.: 92449737

LABORATORY CONTROL SAMPLE: 2711189

| Parameter | Units | Spike Conc. | LCS Result | LCS % Rec | % Rec Limits | Qualifiers |
|-----------------------------|-------|-------------|------------|-----------|--------------|------------|
| 1,2-Dibromo-3-chloropropane | ug/kg | 50 | 55.0 | 110 | 57-141 | |
| 1,2-Dibromoethane (EDB) | ug/kg | 50 | 55.0 | 110 | 70-130 | |
| 1,2-Dichlorobenzene | ug/kg | 50 | 50.5 | 101 | 70-130 | |
| 1,2-Dichloroethane | ug/kg | 50 | 54.9 | 110 | 70-130 | |
| 1,2-Dichloropropane | ug/kg | 50 | 51.4 | 103 | 70-130 | |
| 1,3,5-Trimethylbenzene | ug/kg | 50 | 52.3 | 105 | 70-130 | |
| 1,3-Dichlorobenzene | ug/kg | 50 | 50.3 | 101 | 70-130 | |
| 1,3-Dichloropropane | ug/kg | 50 | 55.4 | 111 | 70-130 | |
| 1,4-Dichlorobenzene | ug/kg | 50 | 50.3 | 101 | 70-130 | |
| 2,2-Dichloropropane | ug/kg | 50 | 55.5 | 111 | 70-130 | |
| 2-Butanone (MEK) | ug/kg | 100 | 112 | 112 | 60-130 | |
| 2-Chlorotoluene | ug/kg | 50 | 51.0 | 102 | 70-130 | |
| 2-Hexanone | ug/kg | 100 | 119 | 119 | 70-132 | |
| 4-Chlorotoluene | ug/kg | 50 | 52.3 | 105 | 70-130 | |
| 4-Methyl-2-pentanone (MIBK) | ug/kg | 100 | 116 | 116 | 69-130 | |
| Acetone | ug/kg | 100 | 117 | 117 | 49-148 | |
| Benzene | ug/kg | 50 | 54.8 | 110 | 70-130 | |
| Bromobenzene | ug/kg | 50 | 50.2 | 100 | 70-130 | |
| Bromochloromethane | ug/kg | 50 | 50.5 | 101 | 70-130 | |
| Bromodichloromethane | ug/kg | 50 | 55.3 | 111 | 70-130 | |
| Bromoform | ug/kg | 50 | 52.7 | 105 | 68-136 | |
| Bromomethane | ug/kg | 50 | 53.1 | 106 | 60-140 | |
| Carbon tetrachloride | ug/kg | 50 | 51.2 | 102 | 70-130 | |
| Chlorobenzene | ug/kg | 50 | 49.8 | 100 | 70-130 | |
| Chloroethane | ug/kg | 50 | 56.4 | 113 | 51-147 | |
| Chloroform | ug/kg | 50 | 46.9 | 94 | 70-130 | |
| Chloromethane | ug/kg | 50 | 58.2 | 116 | 48-130 | |
| cis-1,2-Dichloroethene | ug/kg | 50 | 52.3 | 105 | 70-130 | |
| cis-1,3-Dichloropropene | ug/kg | 50 | 55.2 | 110 | 70-130 | |
| Dibromochloromethane | ug/kg | 50 | 54.0 | 108 | 70-130 | |
| Dibromomethane | ug/kg | 50 | 52.3 | 105 | 70-130 | |
| Dichlorodifluoromethane | ug/kg | 50 | 61.1 | 122 | 49-130 | |
| Diisopropyl ether | ug/kg | 50 | 55.6 | 111 | 66-130 | |
| Ethylbenzene | ug/kg | 50 | 51.7 | 103 | 70-130 | |
| Hexachloro-1,3-butadiene | ug/kg | 50 | 52.6 | 105 | 70-130 | |
| Isopropylbenzene (Cumene) | ug/kg | 50 | 51.0 | 102 | 70-130 | |
| m&p-Xylene | ug/kg | 100 | 103 | 103 | 70-130 | |
| Methyl-tert-butyl ether | ug/kg | 50 | 53.1 | 106 | 70-130 | |
| Methylene Chloride | ug/kg | 50 | 48.8 | 98 | 50-137 | |
| n-Butylbenzene | ug/kg | 50 | 52.4 | 105 | 70-130 | |
| n-Propylbenzene | ug/kg | 50 | 52.6 | 105 | 70-130 | |
| Naphthalene | ug/kg | 50 | 52.2 | 104 | 70-131 | |
| o-Xylene | ug/kg | 50 | 50.1 | 100 | 70-130 | |
| p-Isopropyltoluene | ug/kg | 50 | 50.9 | 102 | 70-130 | |
| sec-Butylbenzene | ug/kg | 50 | 51.2 | 102 | 70-130 | |
| Styrene | ug/kg | 50 | 48.5 | 97 | 70-130 | |
| tert-Butylbenzene | ug/kg | 50 | 45.5 | 91 | 69-130 | |

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REPORT OF LABORATORY ANALYSIS

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QUALITY CONTROL DATA

Project: G18063
Pace Project No.: 92449737

LABORATORY CONTROL SAMPLE: 2711189

| Parameter | Units | Spike Conc. | LCS Result | LCS % Rec | % Rec Limits | Qualifiers |
|---------------------------|-------|-------------|------------|-----------|--------------|------------|
| Tetrachloroethene | ug/kg | 50 | 52.8 | 106 | 56-130 | |
| Toluene | ug/kg | 50 | 51.5 | 103 | 70-130 | |
| trans-1,2-Dichloroethene | ug/kg | 50 | 52.5 | 105 | 70-130 | |
| trans-1,3-Dichloropropene | ug/kg | 50 | 57.1 | 114 | 70-130 | |
| Trichloroethene | ug/kg | 50 | 51.8 | 104 | 70-141 | |
| Trichlorofluoromethane | ug/kg | 50 | 57.0 | 114 | 67-130 | |
| Vinyl acetate | ug/kg | 100 | 149 | 149 | 10-136 | L1,v1 |
| Vinyl chloride | ug/kg | 50 | 58.2 | 116 | 67-130 | |
| Xylene (Total) | ug/kg | 150 | 154 | 102 | 70-130 | |
| 1,2-Dichloroethane-d4 (S) | % | | | 104 | 70-132 | |
| 4-Bromofluorobenzene (S) | % | | | 102 | 70-130 | |
| Toluene-d8 (S) | % | | | 102 | 70-130 | |

MATRIX SPIKE SAMPLE: 2712535

| Parameter | Units | 92449737002 Result | Spike Conc. | MS Result | MS % Rec | % Rec Limits | Qualifiers |
|-----------------------------|-------|--------------------|-------------|-----------|----------|--------------|------------|
| 1,1,1,2-Tetrachloroethane | ug/kg | ND | 22.2 | 22.2 | 100 | 52-133 | |
| 1,1,1-Trichloroethane | ug/kg | ND | 22.2 | 26.1 | 117 | 49-137 | |
| 1,1,2,2-Tetrachloroethane | ug/kg | ND | 22.2 | 22.2 | 100 | 39-150 | |
| 1,1,2-Trichloroethane | ug/kg | ND | 22.2 | 23.3 | 105 | 48-140 | |
| 1,1-Dichloroethane | ug/kg | ND | 22.2 | 24.9 | 112 | 46-135 | |
| 1,1-Dichloroethene | ug/kg | ND | 22.2 | 28.1 | 126 | 38-149 | |
| 1,1-Dichloropropene | ug/kg | ND | 22.2 | 24.5 | 110 | 41-140 | |
| 1,2,3-Trichlorobenzene | ug/kg | ND | 22.2 | 21.6 | 97 | 10-158 | |
| 1,2,3-Trichloropropane | ug/kg | ND | 22.2 | 23.6 | 106 | 33-157 | |
| 1,2,4-Trichlorobenzene | ug/kg | ND | 22.2 | 21.3 | 96 | 10-155 | |
| 1,2,4-Trimethylbenzene | ug/kg | ND | 22.2 | 22.0 | 99 | 24-154 | |
| 1,2-Dibromo-3-chloropropane | ug/kg | ND | 22.2 | 24.5 | 110 | 33-158 | |
| 1,2-Dibromoethane (EDB) | ug/kg | ND | 22.2 | 22.8 | 103 | 40-136 | |
| 1,2-Dichlorobenzene | ug/kg | ND | 22.2 | 21.5 | 97 | 27-146 | |
| 1,2-Dichloroethane | ug/kg | ND | 22.2 | 24.4 | 110 | 49-140 | |
| 1,2-Dichloropropane | ug/kg | ND | 22.2 | 24.4 | 110 | 44-143 | |
| 1,3,5-Trimethylbenzene | ug/kg | ND | 22.2 | 22.6 | 102 | 40-144 | |
| 1,3-Dichlorobenzene | ug/kg | ND | 22.2 | 21.6 | 97 | 33-140 | |
| 1,3-Dichloropropane | ug/kg | ND | 22.2 | 23.1 | 104 | 47-147 | |
| 1,4-Dichlorobenzene | ug/kg | ND | 22.2 | 21.5 | 97 | 35-139 | |
| 2,2-Dichloropropane | ug/kg | ND | 22.2 | 25.7 | 116 | 41-140 | |
| 2-Butanone (MEK) | ug/kg | ND | 44.4 | 45.2J | 102 | 10-181 | |
| 2-Chlorotoluene | ug/kg | ND | 22.2 | 22.6 | 102 | 38-147 | |
| 2-Hexanone | ug/kg | ND | 44.4 | 45.2J | 102 | 18-169 | |
| 4-Chlorotoluene | ug/kg | ND | 22.2 | 22.4 | 101 | 36-145 | |
| 4-Methyl-2-pentanone (MIBK) | ug/kg | ND | 44.4 | 47.2J | 106 | 16-175 | |
| Acetone | ug/kg | ND | 44.4 | 64J | 129 | 10-200 | |
| Benzene | ug/kg | ND | 22.2 | 25.4 | 114 | 46-136 | |
| Bromobenzene | ug/kg | ND | 22.2 | 22.6 | 102 | 38-149 | |

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QUALITY CONTROL DATA

Project: G18063
Pace Project No.: 92449737

| MATRIX SPIKE SAMPLE: 2712535 | | 92449737002 | Spike | MS | MS | % Rec | |
|------------------------------|-------|-------------|-------|--------|-------|--------|------------|
| Parameter | Units | Result | Conc. | Result | % Rec | Limits | Qualifiers |
| Bromochloromethane | ug/kg | ND | 22.2 | 24.8 | 112 | 44-142 | |
| Bromodichloromethane | ug/kg | ND | 22.2 | 24.8 | 111 | 41-140 | |
| Bromoform | ug/kg | ND | 22.2 | 22.9 | 103 | 34-145 | |
| Bromomethane | ug/kg | ND | 22.2 | 23.2 | 104 | 14-162 | |
| Carbon tetrachloride | ug/kg | ND | 22.2 | 27.4 | 123 | 44-141 | |
| Chlorobenzene | ug/kg | ND | 22.2 | 22.6 | 102 | 39-141 | |
| Chloroethane | ug/kg | ND | 22.2 | 34.7 | 156 | 10-182 | |
| Chloroform | ug/kg | ND | 22.2 | 25.6 | 115 | 45-140 | |
| Chloromethane | ug/kg | ND | 22.2 | 28.1 | 126 | 19-149 | |
| cis-1,2-Dichloroethene | ug/kg | ND | 22.2 | 24.9 | 112 | 38-150 | |
| cis-1,3-Dichloropropene | ug/kg | ND | 22.2 | 25.3 | 114 | 30-144 | |
| Dibromochloromethane | ug/kg | ND | 22.2 | 21.7 | 98 | 36-145 | |
| Dibromomethane | ug/kg | ND | 22.2 | 23.8 | 107 | 41-145 | |
| Dichlorodifluoromethane | ug/kg | ND | 22.2 | 30.8 | 138 | 16-146 | |
| Diisopropyl ether | ug/kg | ND | 22.2 | 23.6 | 106 | 41-143 | |
| Ethylbenzene | ug/kg | ND | 22.2 | 23.5 | 106 | 35-144 | |
| Hexachloro-1,3-butadiene | ug/kg | ND | 22.2 | 22.9 | 103 | 10-160 | |
| Isopropylbenzene (Cumene) | ug/kg | ND | 22.2 | 22.9 | 103 | 30-152 | |
| m&p-Xylene | ug/kg | ND | 44.4 | 46.6 | 105 | 33-145 | |
| Methyl-tert-butyl ether | ug/kg | ND | 22.2 | 22.7 | 102 | 49-140 | |
| Methylene Chloride | ug/kg | ND | 22.2 | 23.3 | 105 | 10-174 | |
| n-Butylbenzene | ug/kg | ND | 22.2 | 22.6 | 102 | 10-160 | |
| n-Propylbenzene | ug/kg | ND | 22.2 | 23.5 | 106 | 24-159 | |
| Naphthalene | ug/kg | ND | 22.2 | 20.3 | 91 | 10-171 | |
| o-Xylene | ug/kg | ND | 22.2 | 22.9 | 103 | 31-150 | |
| p-Isopropyltoluene | ug/kg | ND | 22.2 | 22.9 | 103 | 21-154 | |
| sec-Butylbenzene | ug/kg | ND | 22.2 | 23.7 | 107 | 19-159 | |
| Styrene | ug/kg | ND | 22.2 | 21.3 | 96 | 15-152 | |
| tert-Butylbenzene | ug/kg | ND | 22.2 | 20.9 | 94 | 31-141 | |
| Tetrachloroethene | ug/kg | ND | 22.2 | 23.4 | 105 | 19-141 | |
| Toluene | ug/kg | ND | 22.2 | 24.4 | 110 | 31-146 | |
| trans-1,2-Dichloroethene | ug/kg | ND | 22.2 | 25.4 | 114 | 28-157 | |
| trans-1,3-Dichloropropene | ug/kg | ND | 22.2 | 23.4 | 106 | 25-146 | |
| Trichloroethene | ug/kg | ND | 22.2 | 24.6 | 111 | 34-149 | |
| Trichlorofluoromethane | ug/kg | ND | 22.2 | 29.4 | 132 | 10-167 | |
| Vinyl acetate | ug/kg | ND | 44.4 | 57.7 | 130 | 10-200 | |
| Vinyl chloride | ug/kg | ND | 22.2 | 28.2 | 127 | 36-155 | |
| Xylene (Total) | ug/kg | ND | 66.7 | 69.5 | 104 | 29-148 | |
| 1,2-Dichloroethane-d4 (S) | % | | | | 109 | 70-132 | |
| 4-Bromofluorobenzene (S) | % | | | | 97 | 70-130 | |
| Toluene-d8 (S) | % | | | | 101 | 70-130 | |

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REPORT OF LABORATORY ANALYSIS

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QUALITY CONTROL DATA

Project: G18063
Pace Project No.: 92449737

SAMPLE DUPLICATE: 2712534

| Parameter | Units | 92449737001 Result | Dup Result | RPD | Qualifiers |
|-----------------------------|-------|-----------------------|---------------|-----|------------|
| 1,1,1,2-Tetrachloroethane | ug/kg | ND | ND | | |
| 1,1,1-Trichloroethane | ug/kg | ND | ND | | |
| 1,1,2,2-Tetrachloroethane | ug/kg | ND | ND | | |
| 1,1,2-Trichloroethane | ug/kg | ND | ND | | |
| 1,1-Dichloroethane | ug/kg | ND | ND | | |
| 1,1-Dichloroethene | ug/kg | ND | ND | | |
| 1,1-Dichloropropene | ug/kg | ND | ND | | |
| 1,2,3-Trichlorobenzene | ug/kg | ND | ND | | |
| 1,2,3-Trichloropropane | ug/kg | ND | ND | | |
| 1,2,4-Trichlorobenzene | ug/kg | ND | ND | | |
| 1,2,4-Trimethylbenzene | ug/kg | ND | ND | | |
| 1,2-Dibromo-3-chloropropane | ug/kg | ND | ND | | |
| 1,2-Dibromoethane (EDB) | ug/kg | ND | ND | | |
| 1,2-Dichlorobenzene | ug/kg | ND | ND | | |
| 1,2-Dichloroethane | ug/kg | ND | ND | | |
| 1,2-Dichloropropane | ug/kg | ND | ND | | |
| 1,3,5-Trimethylbenzene | ug/kg | ND | ND | | |
| 1,3-Dichlorobenzene | ug/kg | ND | ND | | |
| 1,3-Dichloropropane | ug/kg | ND | ND | | |
| 1,4-Dichlorobenzene | ug/kg | ND | ND | | |
| 2,2-Dichloropropane | ug/kg | ND | ND | | |
| 2-Butanone (MEK) | ug/kg | ND | ND | | |
| 2-Chlorotoluene | ug/kg | ND | ND | | |
| 2-Hexanone | ug/kg | ND | ND | | |
| 4-Chlorotoluene | ug/kg | ND | ND | | |
| 4-Methyl-2-pentanone (MIBK) | ug/kg | ND | ND | | |
| Acetone | ug/kg | ND | ND | | |
| Benzene | ug/kg | ND | ND | | |
| Bromobenzene | ug/kg | ND | ND | | |
| Bromochloromethane | ug/kg | ND | ND | | |
| Bromodichloromethane | ug/kg | ND | ND | | |
| Bromoform | ug/kg | ND | ND | | |
| Bromomethane | ug/kg | ND | ND | | |
| Carbon tetrachloride | ug/kg | ND | ND | | |
| Chlorobenzene | ug/kg | ND | ND | | |
| Chloroethane | ug/kg | ND | ND | | |
| Chloroform | ug/kg | ND | ND | | |
| Chloromethane | ug/kg | ND | ND | | |
| cis-1,2-Dichloroethene | ug/kg | ND | ND | | |
| cis-1,3-Dichloropropene | ug/kg | ND | ND | | |
| Dibromochloromethane | ug/kg | ND | ND | | |
| Dibromomethane | ug/kg | ND | ND | | |
| Dichlorodifluoromethane | ug/kg | ND | ND | | |
| Diisopropyl ether | ug/kg | ND | ND | | |
| Ethylbenzene | ug/kg | ND | ND | | |
| Hexachloro-1,3-butadiene | ug/kg | ND | ND | | |
| Isopropylbenzene (Cumene) | ug/kg | ND | ND | | |

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QUALITY CONTROL DATA

Project: G18063
Pace Project No.: 92449737

SAMPLE DUPLICATE: 2712534

| Parameter | Units | 92449737001 Result | Dup Result | RPD | Qualifiers |
|---------------------------|-------|-----------------------|---------------|-----|------------|
| m&p-Xylene | ug/kg | ND | ND | | |
| Methyl-tert-butyl ether | ug/kg | ND | ND | | |
| Methylene Chloride | ug/kg | ND | ND | | |
| n-Butylbenzene | ug/kg | ND | ND | | |
| n-Propylbenzene | ug/kg | ND | ND | | |
| Naphthalene | ug/kg | ND | ND | | |
| o-Xylene | ug/kg | ND | ND | | |
| p-Isopropyltoluene | ug/kg | ND | ND | | |
| sec-Butylbenzene | ug/kg | ND | ND | | |
| Styrene | ug/kg | ND | ND | | |
| tert-Butylbenzene | ug/kg | ND | ND | | |
| Tetrachloroethene | ug/kg | ND | ND | | |
| Toluene | ug/kg | ND | ND | | |
| trans-1,2-Dichloroethene | ug/kg | ND | ND | | |
| trans-1,3-Dichloropropene | ug/kg | ND | ND | | |
| Trichloroethene | ug/kg | ND | ND | | |
| Trichlorofluoromethane | ug/kg | ND | ND | | |
| Vinyl acetate | ug/kg | ND | ND | | |
| Vinyl chloride | ug/kg | ND | ND | | |
| Xylene (Total) | ug/kg | ND | ND | | |
| 1,2-Dichloroethane-d4 (S) | % | 108 | 100 | | |
| 4-Bromofluorobenzene (S) | % | 101 | 99 | | |
| Toluene-d8 (S) | % | 103 | 108 | | |

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QUALITY CONTROL DATA

Project: G18063
Pace Project No.: 92449737

| | | | |
|-------------------------|--------------------------|-----------------------|-----------------------------|
| QC Batch: | 504241 | Analysis Method: | ASTM D2974-87 |
| QC Batch Method: | ASTM D2974-87 | Analysis Description: | Dry Weight/Percent Moisture |
| Associated Lab Samples: | 92449737001, 92449737002 | | |

SAMPLE DUPLICATE: 2709812

| Parameter | Units | 92449529001 Result | Dup Result | RPD | Qualifiers |
|------------------|-------|-----------------------|---------------|-----|------------|
| Percent Moisture | % | 25.1 | 25.5 | 1 | |

SAMPLE DUPLICATE: 2709813

| Parameter | Units | 92449810001 Result | Dup Result | RPD | Qualifiers |
|------------------|-------|-----------------------|---------------|-----|------------|
| Percent Moisture | % | 12.2 | 12.8 | 4 | |

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REPORT OF LABORATORY ANALYSIS

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QUALIFIERS

Project: G18063
Pace Project No.: 92449737

DEFINITIONS

DF - Dilution Factor, if reported, represents the factor applied to the reported data due to dilution of the sample aliquot.

ND - Not Detected at or above adjusted reporting limit.

TNTC - Too Numerous To Count

J - Estimated concentration above the adjusted method detection limit and below the adjusted reporting limit.

MDL - Adjusted Method Detection Limit.

PQL - Practical Quantitation Limit.

RL - Reporting Limit - The lowest concentration value that meets project requirements for quantitative data with known precision and bias for a specific analyte in a specific matrix.

S - Surrogate

1,2-Diphenylhydrazine decomposes to and cannot be separated from Azobenzene using Method 8270. The result for each analyte is a combined concentration.

Consistent with EPA guidelines, unrounded data are displayed and have been used to calculate % recovery and RPD values.

LCS(D) - Laboratory Control Sample (Duplicate)

MS(D) - Matrix Spike (Duplicate)

DUP - Sample Duplicate

RPD - Relative Percent Difference

NC - Not Calculable.

SG - Silica Gel - Clean-Up

U - Indicates the compound was analyzed for, but not detected.

Acid preservation may not be appropriate for 2 Chloroethylvinyl ether.

A separate vial preserved to a pH of 4-5 is recommended in SW846 Chapter 4 for the analysis of Acrolein and Acrylonitrile by EPA Method 8260.

N-Nitrosodiphenylamine decomposes and cannot be separated from Diphenylamine using Method 8270. The result reported for each analyte is a combined concentration.

Pace Analytical is TNI accredited. Contact your Pace PM for the current list of accredited analytes.

TNI - The NELAC Institute.

LABORATORIES

PASI-C Pace Analytical Services - Charlotte

ANALYTE QUALIFIERS

L1 Analyte recovery in the laboratory control sample (LCS) was above QC limits. Results for this analyte in associated samples may be biased high.

v1 The continuing calibration verification was above the method acceptance limit. Any detection for the analyte in the associated samples may have a high bias.

REPORT OF LABORATORY ANALYSIS

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QUALITY CONTROL DATA CROSS REFERENCE TABLE

Project: G18063
Pace Project No.: 92449737

| Lab ID | Sample ID | QC Batch Method | QC Batch | Analytical Method | Analytical Batch |
|-------------|-----------|-----------------|----------|-------------------|------------------|
| 92449737001 | B08 | EPA 5035A | 504508 | EPA 8260D | 504512 |
| 92449737002 | B09 | EPA 5035A | 504508 | EPA 8260D | 504512 |
| 92449737001 | B08 | ASTM D2974-87 | 504241 | | |
| 92449737002 | B09 | ASTM D2974-87 | 504241 | | |

REPORT OF LABORATORY ANALYSIS

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WO# : 92449737

CHAIN-OF-CUSTODY Analytical Request Document



Chain-of-Custody is a LEGAL DOCUMENT - Complete all relevant fields

Company: **FAICON**
 Address: **1210 TRINITY RD ST 10**
 Report To: **CB CALEY NC 27513**
 Copy To: **CB CALEY NC 27513**
 Billing Information: **SAME**
 Email To: **cburkhardt@faiconengines.com**
 Site Collection Info/Address:

Customer Project Name/Number: **C718063**
 State: **NC** County/City: **Mecklenburg** Time Zone Collected: **ET**
 Phone: **919 730 0001** Site/Facility ID #: **NC/Mecklenburg**
 Compliance Monitoring? **No**
 DW PWS ID #: **8260**
 DW Location Code: **8260**
 Turnaround Date Required: **10-18-19**
 Rush: Same Day Next Day No
 3 Day 4 Day 5 Day
 (Expedite Charges Apply)
 Analysis: **8260**

* Matrix Codes (Insert in Matrix box below): Drinking Water (GW), Wastewater (WW), Product (P), Soil/Solid (SL), Oil (OL), Wipe (WP), Air (AR), Tissue (TS), Bioassay (B), Vapor (V), Other (OT)

| Customer Sample ID | Matrix * | Comp / Grab | Collected (or Composite Start) | | Composite End | Res Cl | # of Cms |
|--------------------|-----------|-------------|--------------------------------|-------------|---------------|--------|----------|
| | | | Date | Time | | | |
| B08 | SL | C1 | 10/15/19 | 1049 | | | 6 |
| B09 | SL | C1 | 10/15/19 | 1021 | | | 6 |

Customer Remarks / Special Conditions / Possible Hazards: **Wet**
 Type of Ice Used: **Wet** Blue Dry None
 Packing Material Used:
 Radchem sample(s) screened (<500 cpm): Y N NA
 Date/Time: **10/15/19 1639** Received by/Company: (Signature) **Zahmy Han**
 Date/Time: Received by/Company: (Signature)
 Date/Time: Received by/Company: (Signature)

LAB USE ONLY
 Container, Preservative Type **
 6 7 0
 Lab Project Manager:

** Preservatives Types: (1) nitric acid, (2) sulfuric acid, (3) hydrochloric acid, (4) sodium hydroxide, (5) zinc acetate, (6) methanol, (7) sodium bisulfate, (8) sodium thiosulfate, (9) hexane, (A) ascorbic acid, (B) ammonium sulfate, (C) ammonium hydroxide, (D) TSP, (U) Unpreserved, (O) Other **DI WATER**

Analyses

| Lab Profile/Line: | Lab Sample Receipt Checklist: |
|----------------------------------|---|
| 8260 Chlorinated Solvents | Custody Seals Present/Intact Y N NA Custody Signatures Present Y N NA Collector Signatures Present Y N NA Bottles Intact Y N NA Correct Bottles Y N NA Sufficient Volume Y N NA Samples Received on Ice Y N NA VOA - Headspace Acceptable Y N NA USDA Regulated Soils Y N NA Samples in Holding Time Y N NA Residual Chlorine Present Y N NA Cl Strips: Y N NA Sample pH Acceptable Y N NA pH Strips Present Y N NA Sulfide Present Y N NA Lead Acetate Strips: Y N NA LAB USE ONLY: 92449737 Lab Sample #: 8260 |

SHORT HOLDS PRESENT (<72 hours): Y N N/A
 Lab Tracking #: **2409979**
 Samples received via: FEDEX UPS Client Courier Pace Courier
 Date/Time: **10/15/19 1639** Table #: **2409979**
 Date/Time: Accnum:
 Date/Time: Template:
 Date/Time: Prelogin:
 Date/Time: PM:
 Date/Time: PB:

Chain-of-Custody Analytical Request Document

Chain-of-Custody is a LEGAL DOCUMENT - Complete all relevant fields

LAB USE ONLY - Affix Workorder/Login Label Here or List Pace Workorder Number or MTJL Log-in Number Here

Company: FAICON

Address: 1210 TRINITY RD ST 110

Report To: CB CARY NC 27513

Copy To: CARY

Billing Information: SAME

Email To: c.burkhardt@faiconeng.com

Site Collection Info/Address: ...

Customer Project Name/Number: 678063

Phone: 919 730 0064

State: NC

County/City: Mecklenburg

Time Zone Collected: ET

Site/Facility ID #: ...

Purchase Order #: ...

Quote #: ...

Turnaround Date Required: 10-18-19

Rush: [] 2 Day [] 3 Day [] 4 Day [] 5 Day [] Same Day [] Next Day

Sample Disposal: [] Dispose as appropriate [] Return [] Archive [] Hold:

* Matrix Codes (Insert in Matrix box below): Drinking Water (DW), Ground Water (GW), Wastewater (WW), Product (P), Soil/Solid (SL), Oil (OL), Wipe (WP), Air (AR), Tissue (TS), Bioassay (B), Vapor (V), Other (OT)

Table with columns: Customer Sample ID, Matrix, Comp/Grab, Collected (or Composite Start) Date, Time, Composite End Date, Time, Res Cl, # of Ctns, Wet/Dry/None, Type of Ice Used, Packing Material Used, Radchem sample(s) screened (<500 cpm), Y N NA, Received by/Company, Date/Time.

Container/Preservative Type **

Preservative Types: (1) nitric acid, (2) sulfuric acid, (3) hydrochloric acid, (4) sodium hydroxide, (5) zinc acetate, (6) methanol, (7) sodium bisulfate, (8) sodium thiosulfate, (9) hexane, (A) ascorbic acid, (B) ammonium sulfate, (C) ammonium hydroxide, (D) TSP, (U) Unpreserved, (O) Other

Lab Profile/Line:

Lab Sample Receipt Checklist: Custody Seals Present/Intact Y N NA, Custody Signatures Present Y N NA, Collector Signatures Present Y N NA, Bottles Intact Y N NA, Correct Bottles Y N NA, Sufficient Volume Y N NA, Samples Received on Ice Y N NA, VOA - Headspace Acceptable Y N NA, USDA Regulated Soils Y N NA, Samples in Holding Time Y N NA, Residual Chlorine Present Y N NA, Cl Strips: Y N NA, Sample pH Acceptable Y N NA, pH Strips: Y N NA, Sulfide Present Y N NA, Lead Acetate Strips: Y N NA

LAB USE ONLY: Lab Sample # / Comments:

SHORT HOLDS PRESENT (<72 hours): Y N N/A

Lab Tracking #: 2409979

Samples received via: FEDEX UPS Client Courier Pace Courier

Date/Time: 10/15/19 1639, Date/Time: 10/15/19, Date/Time: 10/15/19, Date/Time: 10/15/19, Date/Time: 10/15/19

Relinquished by/Company (Signature): FAICON, Date/Time: 10/15/19 1639, Received by/Company (Signature): [Signature], Date/Time: 10/15/19 1639

Customer Remarks / Special Conditions / Possible Hazards:

Lab Sample Temperature Info: Temp Blank Received: Y N NA, Therm ID#: 911005, Cooler 1 Temp Upon Receipt: 61 OC, Cooler 1 Therm Corr. Factor: 0.1 OC, Cooler 1 Corrected Temp: 60.9 OC, Comments:

Type of Ice Used: Wet

Packing Material Used: Radchem sample(s) screened (<500 cpm): Y N NA



PYRAMID GEOPHYSICAL SERVICES
(PROJECT 2019-260)

GEOPHYSICAL SURVEY

METALLIC UST INVESTIGATION: PARCEL 68 NCDOT PROJECT R-3833C

2785 CHARLOTTE HIGHWAY, MOORESVILLE, NC

September 6, 2019

Report prepared for: Christopher J. Burkhardt, PWS
Falcon Engineers
1210 Trinity Rd. #110
Raleigh, NC 27607

Prepared by: _____

Eric C. Cross, P.G.
NC License #2181

Reviewed by: _____

Douglas A. Canavello, P.G.
NC License #1066

503 INDUSTRIAL AVENUE, GREENSBORO, NC 27406

P: 336.335.3174 F: 336.691.0648

C257: GEOLOGY C1251: ENGINEERING

GEOPHYSICAL INVESTIGATION REPORT
Parcel 68 - 2785 Charlotte Highway
 Mooresville, Iredell County, North Carolina

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LIST OF ACRONYMS

| | |
|------------|---|
| CADD | Computer Assisted Drafting and Design |
| DF | Dual Frequency |
| EM..... | Electromagnetic |
| GPR..... | Ground Penetrating Radar |
| GPS | Global Positioning System |
| NCDOT..... | North Carolina Department of Transportation |
| ROW | Right-of-Way |
| UST | Underground Storage Tank |

EXECUTIVE SUMMARY

Project Description: Pyramid Environmental conducted a geophysical investigation for Falcon Engineers at Parcel 68, located at 2785 Charlotte Highway in Mooresville, NC. The survey was part of an NCDOT Right-of-Way (ROW) investigation (NCDOT Project R-3833C). The survey was designed to extend from the existing edge of pavement into the proposed ROW and/or easements, whichever distance was greater. Conducted from August 11-12, 2019, the geophysical investigation was performed to determine if unknown, metallic underground storage tanks (USTs) were present beneath the survey area.

Geophysical Results: The geophysical investigation consisted of electromagnetic (EM) induction-metal detection and ground penetrating radar (GPR) surveys. A total of nine EM anomalies were identified. The majority of the EM anomalies were directly attributed to visible cultural features at the ground surface. GPR was performed across areas containing significant metallic interference associated with vehicles, a reinforced concrete pipe, and known buried utility lines. No additional significant buried structures were identified. Collectively, the geophysical data did not record any evidence of metallic USTs within the survey area at Parcel 68.

INTRODUCTION

Pyramid Environmental conducted a geophysical investigation for Falcon Engineers at Parcel 68, located at 2785 Charlotte Highway in Mooresville, NC. The survey was part of an NCDOT Right-of-Way (ROW) investigation (NCDOT Project R-3833C). The survey was designed to extend from the existing edge of pavement into the proposed ROW and/or easements, whichever distance was greater. Conducted from August 11-12, 2019, the geophysical investigation was performed to determine if unknown, metallic underground storage tanks (USTs) were present beneath the survey area.

The site included a strip mall surrounded by concrete, grass, and asphalt surfaces. An aerial photograph showing the survey area boundaries and ground-level photographs are shown in **Figure 1**.

FIELD METHODOLOGY

The geophysical investigation consisted of electromagnetic (EM) induction-metal detection and ground penetrating radar (GPR) surveys. Pyramid collected the EM data using a Geonics EM61-MK2 (EM61) metal detector integrated with a Geode External GPS/GLONASS receiver. The integrated GPS system allows the location of the instrument to be recorded in real-time during data collection, resulting in an EM data set that is geo-referenced and can be overlain on aerial photographs and CADD drawings. A boundary grid was established around the perimeter of the site with marks every 10 feet to maintain orientation of the instrument throughout the survey and assure complete coverage of the area.

According to the instrument specifications, the EM61 can detect a metal drum down to a maximum depth of approximately 8 feet. Smaller objects (1-foot or less in size) can be detected to a maximum depth of 4 to 5 feet. The EM61 data were digitally collected at approximately 0.8-foot intervals along north-south trending or east-west trending, generally parallel survey lines, spaced five feet apart. The data were downloaded to a

computer and reviewed in the field and office using the Geonics NAV61 and Surfer for Windows Version 15.0 software programs.

GPR data were acquired across select EM anomalies on August 12, 2019, using a Geophysical Survey Systems, Inc. (GSSI) SIR 4000 controller with a 350 MHz HS antenna. Data were collected both in reconnaissance fashion as well as along formal transect lines across EM features. The GPR data were viewed in real-time using a vertical scan of 512 samples, at a rate of 48 scans per second. GPR data were viewed down to a maximum depth of approximately 6 feet, based on dielectric constants calculated by the DF unit in the field during the reconnaissance scans. GPR transects across specific anomalies were saved to the hard drive of the DF unit for post-processing and figure generation.

Pyramid’s classifications of USTs for the purposes of this report are based directly on the geophysical UST ratings provided by the NCDOT. These ratings are as follows:

| Geophysical Surveys for Underground Storage Tanks on NCDOT Projects | | | |
|--|--|---|---|
| High Confidence | Intermediate Confidence | Low Confidence | No Confidence |
| Known UST Active tank - spatial location, orientation, and approximate depth determined by geophysics. | Probable UST Sufficient geophysical data from both magnetic and radar surveys that is characteristic of a tank. Interpretation may be supported by physical evidence such as fill/vent pipe, metal cover plate, asphalt/concrete patch, etc. | Possible UST Sufficient geophysical data from either magnetic or radar surveys that is characteristic of a tank. Additional data is not sufficient enough to confirm or deny the presence of a UST. | Anomaly noted but not characteristic of a UST. Should be noted in the text and may be called out in the figures at the geophysicist’s discretion. |

DISCUSSION OF RESULTS

Discussion of EM Results

A contour plot of the EM61 results obtained across the survey area at the property is presented in **Figure 2**. Each EM anomaly is numbered for reference in the figure. The following table presents the list of EM anomalies and the cause of the metallic response, if known:

LIST OF METALLIC ANOMALIES IDENTIFIED BY EM SURVEY

| Metallic Anomaly # | Cause of Anomaly | Investigated with GPR |
|---------------------------|--------------------------|------------------------------|
| 1 | Known Buried Utilities | ✓ |
| 2 | Vehicles | ✓ |
| 3 | Light Pole | |
| 4 | Hydrant | |
| 5 | Sign | |
| 6 | Vehicles | ✓ |
| 7 | Drop Inlet | |
| 8 | Reinforced Concrete Pipe | ✓ |
| 9 | Utilities | |

The majority of the EM anomalies were directly attributed to visible cultural features at the ground surface, including vehicles, a light pole, a hydrant, a sign, a drop inlet, a reinforced concrete pipe, and utilities. EM Anomaly 1 was in the location of known buried utilities and was investigated to confirm that the anomaly was a result of these utilities. EM Anomalies 2 and 6 were associated with vehicles at the site and were investigated with GPR to confirm that the metallic interference associated with these vehicles did not obscure any significant buried structures such as USTs. EM Anomaly 8 was in the location of a suspected reinforced concrete pipe and was investigated with GPR to confirm that the anomaly was a result of the reinforced concrete pipe.

Discussion of GPR Results

Figure 3 presents the locations of the formal GPR transects performed at the property as well as the transect images. A total of four formal GPR transects were performed at the site.

GPR Transects 1 and 2 were performed across EM Anomalies 8 and 1, respectively. These transects confirmed the presence of a reinforced concrete pipe and known buried utilities and verified that the EM anomaly observed in this area is a result of this known utility.

GPR Transects 3 and 4 were performed across EM Anomalies 6 and 2, respectively. These transects confirmed that the metallic interference caused by the vehicles at the site did not obscure any significant buried structures such as USTs.

Collectively, the geophysical data did not record any evidence of metallic USTs within the survey area at Parcel 68. **Figure 4** provides an overlay of the metal detection results on the NCDOT MicroStation engineering plans for reference.

SUMMARY & CONCLUSIONS

Pyramid's evaluation of the EM61 and GPR data collected at Parcel 68 in Mooresville, North Carolina, provides the following summary and conclusions:

- The EM61 and GPR surveys provided reliable results for the detection of metallic USTs within the accessible portions of the geophysical survey area.
- The majority of the EM anomalies were directly attributed to visible cultural features at the ground surface.
- GPR was performed across areas containing significant metallic interference associated with vehicles, a reinforced concrete pipe, and known buried utility lines. No additional significant buried structures were identified.
- Collectively, the geophysical data did not record any evidence of metallic USTs within the survey area at Parcel 68.

LIMITATIONS

Geophysical surveys have been performed and this report was prepared for Falcon Engineers in accordance with generally accepted guidelines for EM61 and GPR surveys. It is generally recognized that the results of the EM61 and GPR surveys are non-unique and may not represent actual subsurface conditions. The EM61 and GPR results obtained for this project have not conclusively determined the definitive presence or absence of metallic USTs, but the evidence collected is sufficient to result in the conclusions made in this report. Additionally, it should be understood that areas containing extensive

vegetation, reinforced concrete, or other restrictions to the accessibility of the geophysical instruments could not be fully investigated.

APPROXIMATE BOUNDARIES OF GEOPHYSICAL SURVEY AREA



View of Survey Area
(Facing Approximately South)



View of Survey Area
(Facing Approximately North)



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PROJECT
PARCEL 68
MOORESVILLE, NORTH CAROLINA
NCDOT PROJECT R-3833C

TITLE
PARCEL 68 - GEOPHYSICAL
SURVEY BOUNDARIES AND SITE PHOTOGRAPHS

DATE
9/3/2019
PYRAMID PROJECT #:
2019-260

CLIENT
FALCON ENGINEERS

FIGURE 1

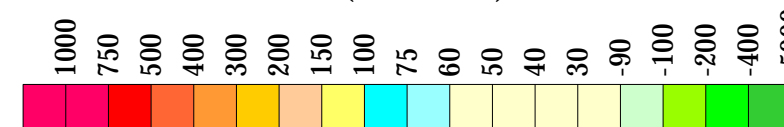
EM61 METAL DETECTION RESULTS



NO EVIDENCE OF METALLIC USTs WAS OBSERVED.

The contour plot shows the differential results of the EM61 instrument in millivolts (mV). The differential results focus on larger metallic objects such as USTs and drums. The EM data were collected on August 11, 2019, using a Geonics EM61-MK2 instrument. Verification GPR data were collected using a GSSI SIR 4000 controller equipped with a 350 MHz HS antenna on August 12, 2019.

EM61 Metal Detection Response (millivolts)



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PROJECT
PARCEL 68
MOORESVILLE, NORTH CAROLINA
NCDOT PROJECT R-3833C

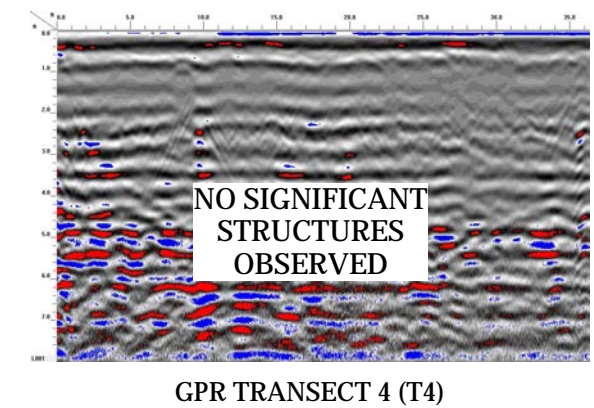
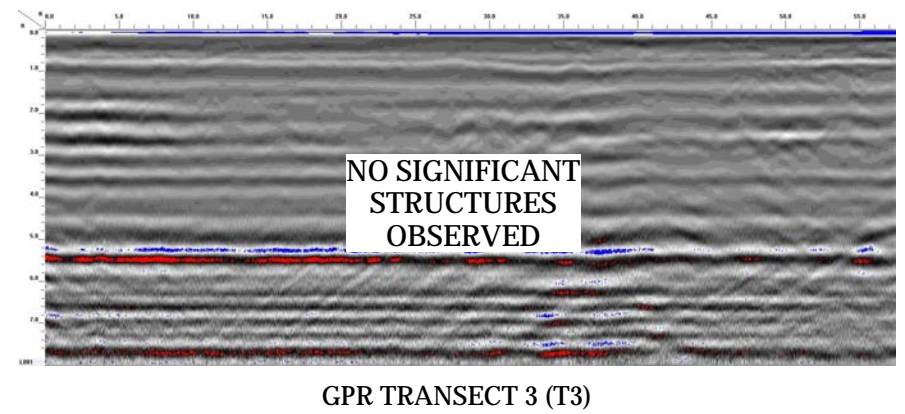
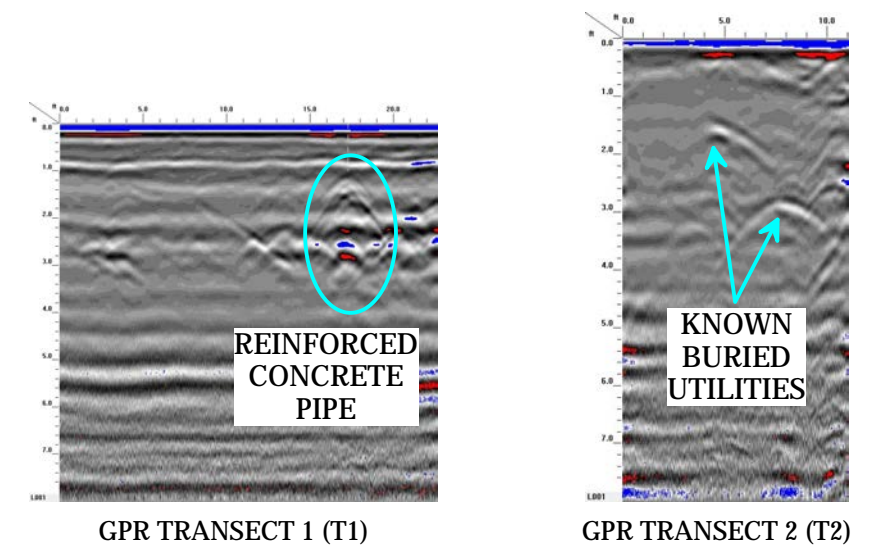
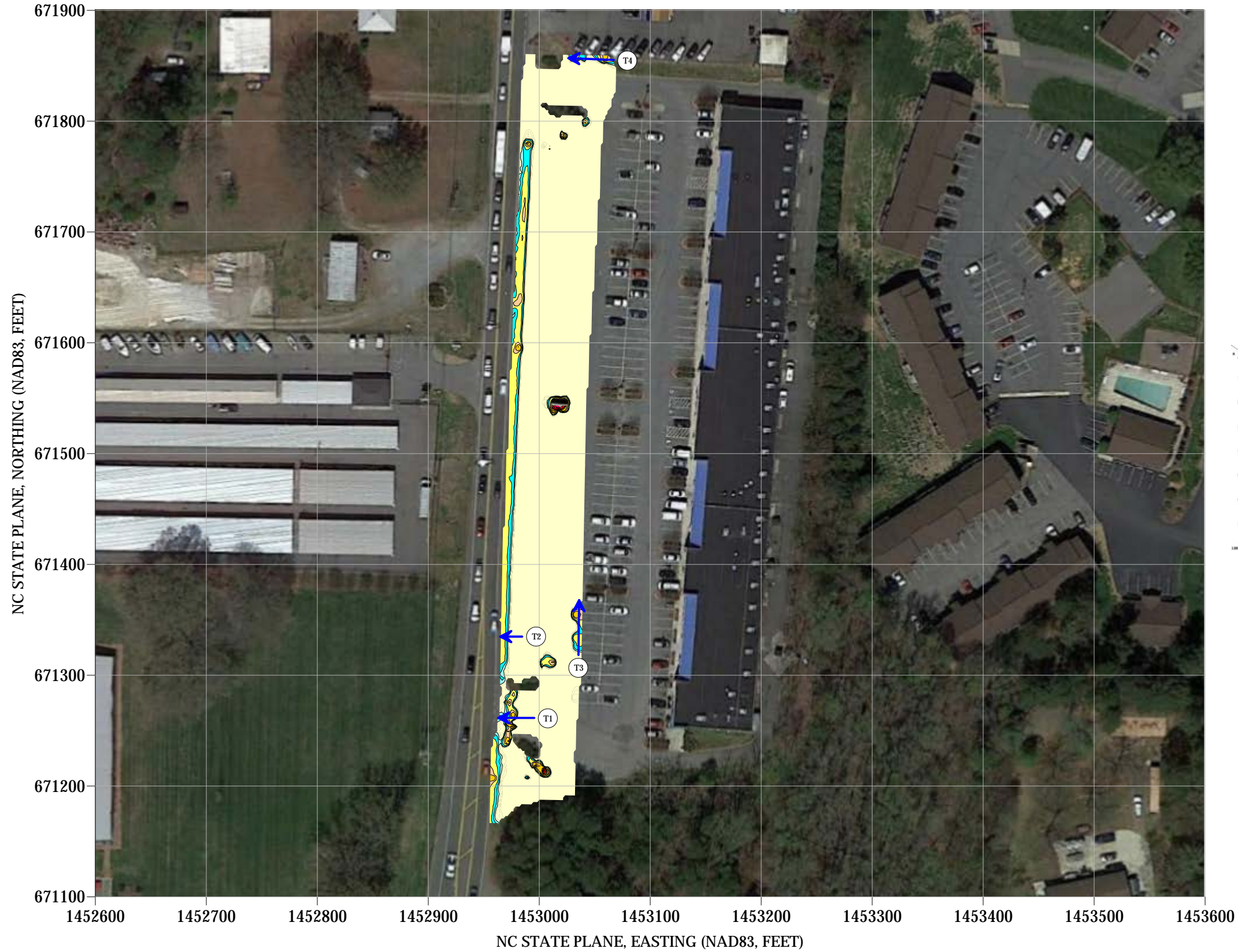
TITLE
PARCEL 68 -
EM61 METAL DETECTION CONTOUR MAP


DATE
9/3/2019
PYRAMID PROJECT #:
2019-260

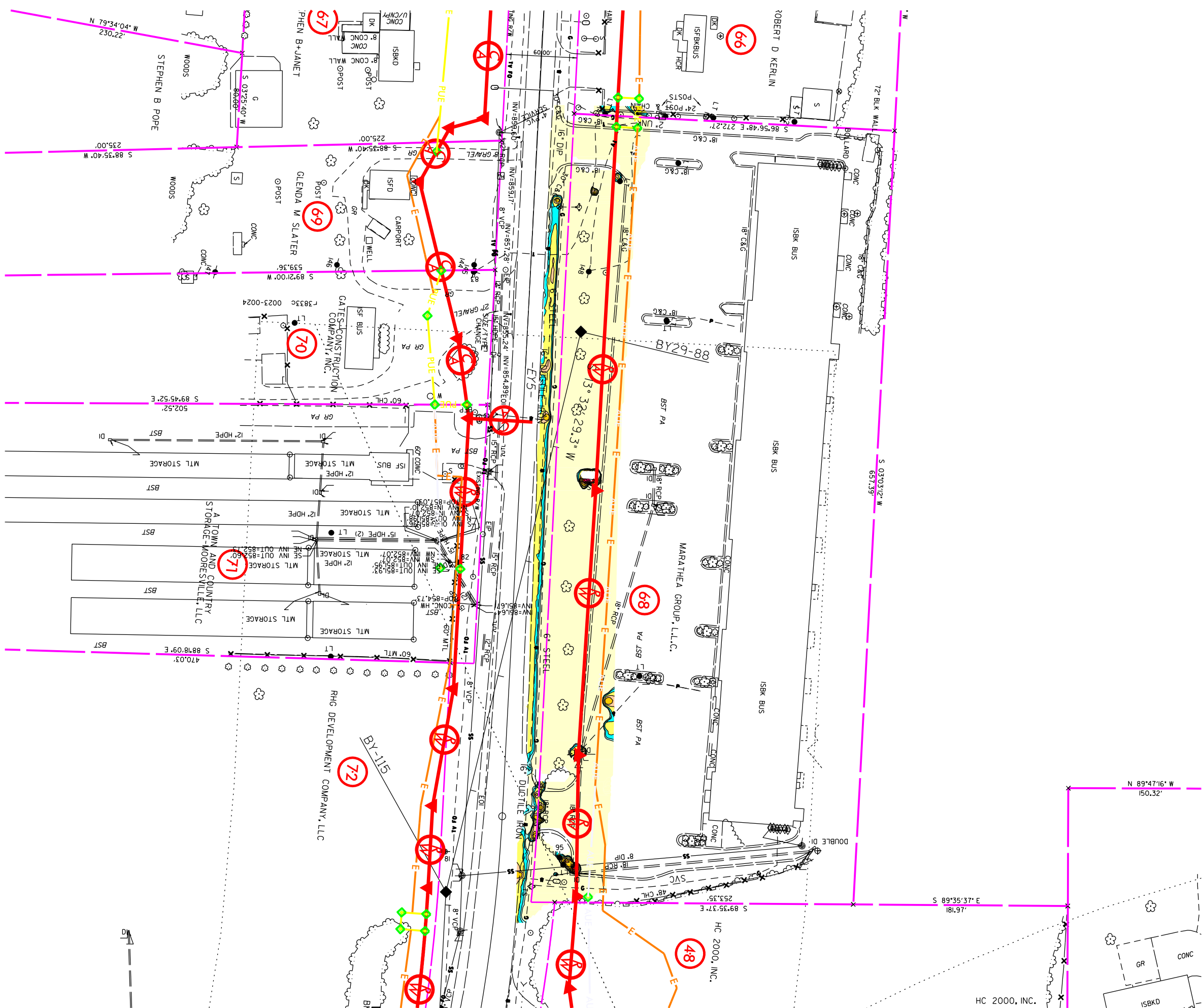
CLIENT
FALCON ENGINEERS

FIGURE 2

LOCATIONS OF GPR TRANSECTS



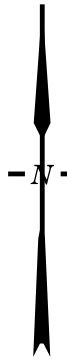
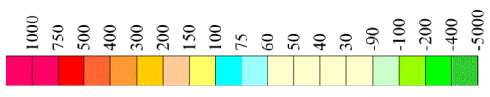
| | | | | |
|---|--|---|---|---------------------------------------|
|  <p>503 INDUSTRIAL AVENUE GREENSBORO, NC 27406 (336) 335-3174 (p) (336) 691-0648 (f) License # C1251 Eng. / License # C257 Geology</p> | <p>PROJECT</p> <p>PARCEL 68 MOORESVILLE, NORTH CAROLINA NCDOT PROJECT R-3833C</p> | <p>TITLE</p> <p>PARCEL 68 - GPR TRANSECT LOCATIONS AND IMAGES</p> | <p>DATE</p> <p>9/3/2019</p> | <p>CLIENT</p> <p>FALCON ENGINEERS</p> |
| | | | <p>PYRAMID PROJECT #:</p> <p>2019-260</p> | <p>FIGURE 3</p> |




LEGEND

- EXISTING ROW
- EXISTING PROPERTY BOUNDARY
- PROPOSED ROW LINE
- TEMPORARY CONSTRUCTION EASEMENT
- PUE
- PROPOSED PERMANENT UTILITY EASEMENT
- PROPOSED SS CUT LINE
- PROPOSED SS FILL LINE

MILLIVOLTS (mV)



| | |
|--|----------------|
| TITLE OVERLAY OF METAL DETECTION RESULTS ON NCDOT ENGINEERING PLANS | |
| PROJECT PARCEL 68 MOORESVILLE, NORTH CAROLINA NCDOT PROJECT R-3833C | |
|  503 INDUSTRIAL AVENUE GREENSBORO, NC 27406 336.335.3174 (p) 336.691.0648 (f) License # C1251 Eng. / #C257 Geology | |
| DATE: 09-06-2019 | REVISION NO. 0 |
| PYRAMID PROJECT NO. 2019-260 | FIGURE NO. 4 |

NORTH CAROLINA DIVISION OF WASTE MANAGEMENT
Dry Cleaning Solvent Cleanup Act (DSCA) Compliance Program
 Inspection Report
 Date: 6/14/2018

| | | | | | | | |
|---|---|---|---|---|---|--|--|
| <p align="center">Facility Data</p> U.S. 2.50 Cleaners 2785 Charlotte Hwy, Ste 11 Mooresville NC 28117 Lat: 35.581111 Long: -80.839444 SIC: 7216 / Dry Cleaning Plants, Except Rugs NAICS: 81232/ Dry Cleaning and Laundry Services (except Coin-Operated) Date of Facility Establishment: 1/1/2000 | | | <p align="center">Facility Identification</p> U.S. 2.50 Cleaners Facility ID: 490002C EPA Generator ID: CESQG County/FIPS: Iredell/097 DSCA Cleanup ID: -- | | | | |
| <p align="center">Contact Data</p> <table border="1"> <tr> <td> <p align="center">Facility Contact</p> Paul Lee 2785 Charlotte Hwy, Ste 11 Mooresville, NC 28117 (704) 799-0059 </td> <td> <p align="center">Facility Owner</p> Paul Lee 2785 Charlotte Hwy, Ste 11 Mooresville, NC 28117 (704) 799-0059 (704) 818-7615 </td> <td> <p align="center">Property Owner</p> Marathea Group LLC P.O. Box 26104 Winston Salem, NC 27114 </td> </tr> </table> | | | <p align="center">Facility Contact</p> Paul Lee 2785 Charlotte Hwy, Ste 11 Mooresville, NC 28117 (704) 799-0059 | <p align="center">Facility Owner</p> Paul Lee 2785 Charlotte Hwy, Ste 11 Mooresville, NC 28117 (704) 799-0059 (704) 818-7615 | <p align="center">Property Owner</p> Marathea Group LLC P.O. Box 26104 Winston Salem, NC 27114 | <p align="center">Compliance Data</p> Inspection Date: 6/14/2018 Time In: 08:00 AM Time Out: 08:55 AM Inspectors: Aram Kim, Rachel Clarke Operating Status: OO/Operating Compliance Codes: In Violation of MMP Action Code: 01/Inspection | |
| <p align="center">Facility Contact</p> Paul Lee 2785 Charlotte Hwy, Ste 11 Mooresville, NC 28117 (704) 799-0059 | <p align="center">Facility Owner</p> Paul Lee 2785 Charlotte Hwy, Ste 11 Mooresville, NC 28117 (704) 799-0059 (704) 818-7615 | <p align="center">Property Owner</p> Marathea Group LLC P.O. Box 26104 Winston Salem, NC 27114 | | | | | |
| <p align="center">Inspector's Signature: <i>Aram Kim</i></p> <p>Date of Signature: 6/14/18</p> | | | <p align="center">Classification Data</p> Service Type: Full Service (Active) Solvent: Perchloroethylene System: Dry-to-Dry Installation Date: 2000 Installation Category: New Consumption Category: Small HW Generator Status: CESQG | | | | |
| <p align="center">Comments:</p> NOV/NRE will be issued. | | | | | | | |

(I) DIRECTIONS: From the Mooresville Regional Office at 610 East Center Avenue in Mooresville, go west on East Center Avenue. Turn left onto S. Broad St./ NC-115. Turn right onto W. Wilson Ave. Turn right onto Charlotte Hwy / US-21. The dry cleaning facility is located on the right at 2785 Charlotte Hwy, in the Marathea Shopping Center.

(II) FACILITY HISTORY: U.S. 2.50 Cleaners was established in 2000 by Paul Lee. Mr. Lee sold the business to Mr. Nam Cho in 2007, who operated the plant until 2009 when he left the country. Mr. Lee took over the business again after Mr. Cho left. Mr. Lee owned another facility called U.S. 2.50 Cleaners, located at 7558 Hwy. 73, #101, in Denver, NC. This was a full service plant until Mr. Lee shut down the machine and operated the facility as a drop-off/pick-up store until it was closed permanently.

Solvent History:

| Solvent | Dates Used |
|-------------------|-----------------|
| Perchloroethylene | 2000 to Present |

Previous Inspections:

| Date | Visit Type | Violation Type(s) | Worst Violation(s) | Action(s) Taken | Response Due | Received Date | Inspector |
|-----------|------------|-------------------|--|--------------------------|--------------|------------------|-----------|
| 8/31/2016 | Inspection | MMP, NESHAP | Improper maintenance of WWTU, NESHAP Procedural Violations, NESHAP Recordkeeping Violations, No WWTU records | NOVNRE sent on 10/4/2016 | 10/25/2016 | N/A or Not Rec'd | Aram Kim |

| | | | | | | | |
|-----------|-------------------------|-------------|--|--------------------------|-----------|------------------|------------|
| 8/31/2016 | Inspection | MMP, NESHAP | Improper maintenance of WWTU, NESHAP Procedural Violations, NESHAP Recordkeeping Violations, No WWTU records | CHKLST sent on 8/31/2016 | None | N/A or Not Rec'd | Aram Kim |
| 12/8/2015 | Inspection | MMP, NESHAP | Discharging vacuum pump condensate into floor drain, NESHAP Procedural Violations, NESHAP Recordkeeping Violations | NOV sent on 12/10/2015 | 1/8/2016 | 1/12/2016 | Aram Kim |
| | | | | CHKLST sent on 12/8/2015 | None | N/A or Not Rec'd | |
| 2/25/2014 | Inspection | MMP, NESHAP | NESHAP Procedural Violations & Recordkeeping Violations, No WWTU records | CHKLST sent on 2/25/2014 | 3/18/2014 | 3/24/2014 | Alicia Roh |
| 6/7/2011 | Initial Inspection | MMP, NESHAP | No spill cont. (waste, wwtu), No records on site | CHKLST sent on 6/7/2011 | 6/21/2011 | 6/20/2011 | Jason Gill |
| | | | | NOVNRE sent on 8/31/2011 | 9/21/2011 | 9/23/2011 | |
| 2/19/2008 | Outreach Training Visit | MMP, NESHAP | No spill cont. (waste drum, wwtu), No records on site | CAL sent on 2/25/2008 | 3/17/2008 | N/A or Not Rec'd | Alicia Roh |

Complaints: None

DSCA Sampling: None

(III) FACILITY CLASSIFICATION:

NESHAP INSTALLATION CATEGORY – New: U.S. 2.50 Cleaners utilizes a 4th Generation dry-to-dry dry cleaning machine that was installed in 2000. Since the dry cleaning machine was installed after December 9, 1991, the dry cleaning machine is classified as a 'New' machine installation.

Dry Cleaning Equipment Summary

| No | Type of Machine | Gen | Manufacturer (Mfr) | Model # | Serial # | Mfr Date | Install Date | Solvent Used | Observed Operating? |
|----|-----------------|-----|--------------------|---------------|-----------|----------|--------------|-------------------|---------------------|
| 1 | Dry-to-Dry | 4th | Firbimatic | Axial 50-plus | 139F00106 | 2000 | 2000 | Perchloroethylene | yes |

NESHAP SOURCE CATEGORY - SMALL: U.S. 2.50 Cleaners is classified as a Small Area Source because it purchased less than 140 gallons of perc during the previous 12-month period. Based on a review of the receipts for the past year, U.S. 2.50 Cleaners purchased 30 gallons of perc from Phenix Supply Company in the last 12 months.

HAZARDOUS WASTE GENERATOR CATEGORY - CESQG: U.S. 2.50 Cleaners is classified as a Conditionally Exempt Small Quantity Generator (CESQG) because the facility has routinely generated less than 220 pounds of waste per month during the past 12 months, and stores less than 2,200 pounds of hazardous waste on site. U.S. 2.50 Cleaners has contracted with Safety Kleen (EPA ID# TXR000050930) to transport the facility-generated hazardous waste to a licensed Treatment Storage or Disposal (TSD) facility. The most recent hazardous waste generated was transported to Safety Kleen in Charlotte, NC (EPA ID# NCD079060059). Three years of hazardous waste manifests were not on site and available for review. The last waste pickup occurred on September 21, 2012, when a total of 450 pounds of

hazardous waste were transported off site (Liquid & Filters waste). One partially full 15-gallon drum of hazardous waste was observed on site at the time of the inspection (approx. 80 lbs). The facility utilizes an onsite wastewater treatment unit (WWTU) to dispose of facility-generated contact water.

(IV) INSPECTION SUMMARY: On June 14, 2018, Aram Kim and Rachel Clarke, Compliance Inspectors, with the North Carolina Division of Waste Management, Dry Cleaning Solvent Cleanup Act (DSCA) Program conducted a Compliance Inspection at U.S. 2.50 Cleaners. The inspectors met with Mr. Paul Lee, store owner, who provided the inspectors access to the facility's equipment and available records.

The facility continues to use the same dry cleaning machine that was observed during previous inspections. Mr. Lee stated that the machine is operated only 2-3 loads per week, and wet-cleans mostly. Mr. Lee said that he usually operates the machine on Tuesday and Wednesday, but he does not have specific schedule to operate the machine. The machine was observed in operation at the time of the inspection. No vapor leaks were discovered with the inspector's halogen leak detector. Mr. Lee showed his halogen detector that he uses at least once a month for required leak detection inspections. Separator water was collected in a container that was stored within the machine spill pan. About a cup of separator water was observed and Mr. Lee estimated that about 0.5 gallon or less separator water is generated per month.

The vacuum pump is located in the boiler room. No pump condensate was observed at the time of the inspection and Mr. Lee said that almost nothing comes out from the vacuum pump.

Facility generated contact water is treated in the onsite wastewater treatment unit (WWTU) manufactured by Galaxy. The WWTU is stored within spill containment and the misting nozzle is mounted on the rear exterior wall of the facility. Mr. Lee stated that he changes the filters on the WWTU every 12 months. However, the inspector observed the date of filter change, 9/15/16, on the secondary filter of the Galaxy mister and asked Mr. Lee if he changed filters on the WWTU after 9/15/16. Mr. Lee said that he does not recall if he did change filter after 9/15/16 or not. Ms. Kim told the owner to go ahead and change filters on the WWTU since 9/15/16 could be the most recent filter change which was over a year ago. The operation manual was kept on site. The misting nozzles were mounted on the exterior wall of the building in a visible location. Ms. Kim recommended Mr. Lee to not operate the WWTU until he changes the filters.

The hazardous waste drum (15-gallon, about 2/3 full) is stored next to the dry cleaning machine without spill containment. The inspector told the owner that any drums containing liquid waste should be stored within adequate spill containment. Mr. Lee apologized said that he will ask his son to help moving the waste drum onto spill containment as soon as possible. The only type of spotting agent used on site is POG. No spotting agents containing PCE or TCE are used on site.

Five years of perc purchase receipts were kept on site available for review. However, the owner was not able to locate the waste disposal manifest. Ms. Kim told the owner to contact his waste hauler to obtain the waste pickup records. The inspectors reminded Mr. Lee that three years of waste disposal manifests should be maintained on site. DSCA Compliance Calendars were maintained on site with required recordkeeping completed.

Emergency spill cleanup material was stored on site. Emergency information form was completed and posted on site.

The following is a summary of U.S. 2.50 Cleaners' compliance with respect to the DSCA Required Minimum Management Practices provided in 15A NCAC 02S.0202, National Emission Standards for Hazardous Air Pollutants (NESHAP) found in 40 CFR Part 63 Subpart M and Resource Conservation, and Recovery Act (RCRA) referenced in 40 CFR part 261.5 and 262.

MMP VIOLATIONS - 15A NCAC 02S.0202

1. Wastewater treatment equipment was not operated in accordance with the manufacturer's specifications, which allowed water containing dry-cleaning solvent to be discharged into the environment.
2. A complete three year history of dry-cleaning solvent waste disposal invoices was not made available to the Department.

3. Spill containment was not installed under and around the waste solvent storage containers.
4. Emergency spill clean-up materials were not available at the time of the inspection.

NESHAP VIOLATIONS - 40 CFR Part 63 Subpart M

None

RCRA VIOLATIONS - Hazardous Waste Regulations: 40 CFR Part 262.34

None

(V) CONCLUSIONS: Based on observations documented by the DSCA Inspectors during the June 14, 2018 inspection, U.S. 2.50 Cleaners is currently in violation of the following regulations:

MMPs - 15A NCAC 02S.0202

| | |
|---------------|--|
| (b)(1) | Failure to prevent solvent waste from discharging into the environment. [15 NCAC 0202 (b)(1)]. |
| (b)(1) | Failure to maintain complete and current invoices for waste disposal [15A NCAC 02S.0202(b)(1)]. Waste manifests are required to be kept on site for three years and available for review. |
| (b)(2) | Failure to maintain spill containment under and around the waste solvent storage area by January 1, 2002 [15 NCAC 0202 (b)(2)]. Spill containment shall have a volumetric capacity of 110 percent of the largest vessel, tank, or container within the spill containment area and shall be capable of preventing the release of the applicable dry cleaning solvent beyond the spill containment area for a period of at least 72 hours. |
| (b)(2) | Failure to maintain emergency absorbent spill cleanup materials on site. [15 NCAC 0202 (b)(2)]. |

NESHAP - 40 CFR Part 63 Subpart M

None

RCRA- Hazardous Waste Regulations: 40 CFR Part 261 - 262

None

(VI) ENFORCEMENT HISTORY (Penalties): None

(VII) RECOMMENDATIONS: A DSCA Compliance Program Checklist (#02697) was issued to Mr. Paul Lee, owner of U.S. 2.50 Cleaners, indicating the compliance issues to be addressed. A Notice of Violation (NOV)/Notice of Recommendation for Enforcement (NRE) will be issued to Mr. Paul Lee for the violations observed during the inspection. DSCA Supervisors will determine if enforcement and civil penalties are warranted after reviewing a written response from U.S. 2.50 Cleaners. A follow-up inspection should be conducted by June 14, 2019 to confirm compliance.

Christopher Burkhardt

From: Chapman, Al <al.chapman@ncdenr.gov>
Sent: Monday, December 10, 2018 7:48 AM
To: Christopher Burkhardt
Subject: RE: [External] Request for File Review: 2.50 Cleaners 2785 Charlotte Highway
Attachments: 20180614US250Clnrs_RPT.pdf

Mr. Burkhardt,

This dry-cleaner facility has not been identified as a possible solvent release site to date. The facility has been inspected by DSCA Compliance Group from 2010 to 2018. See the attached latest compliance inspection report Dated June 14, 2018. This inspection report does not mean that a release has or has not occurred, just no information has been submitted to NCDEQ that a release has occurred. Let me know if you need additional information.

Al Chapman



Al Chapman, P.G. (NC & GA)
Hydrogeologist – Project Manager
North Carolina Department of Environmental Quality
919.707.8602 (Office)
919.707.8368 (Fax)
Al.Chapman@ncdenr.gov

Email correspondence to and from this address is subject to the North Carolina Public Records Law and may be disclosed to third parties.

From: Christopher Burkhardt <cburkhardt@falconengineers.com>
Sent: Friday, December 07, 2018 4:20 PM
To: Chapman, Al <al.chapman@ncdenr.gov>
Subject: [External] Request for File Review: 2.50 Cleaners 2785 Charlotte Highway

CAUTION: External email. Do not click links or open attachments unless verified. Send all suspicious email as an attachment to [Report Spam](#).

Good Afternoon Al,

I am trying to find out more information about a delisted Cleaners located at 2785 Charlotte Highway Mooresville. It is not mapped in the GIS database or a database that reports spills the only information I have on it is below. DOT is considering roadway improvements near this address and I am wondering if there has ever been a release or even active on-site cleaning (perhaps it was a coin operated laundry and not a dry cleaners?).

Any info you can provide would be helpful thanks.

U.S. 2.50 Cleaners
2785 Charlotte Hwy, Ste 11
Mooresville NC
Facility ID: 490002C
File Type: List of Drycleaner Compliance Inspection Visits During 2016
County: Iredell
Original Source: DRYC

Record Date: 31-DEC-2016
Registry ID: 110016687110
FIPS Code: 37097
Program Acronyms: AIRS/AFS, NC-FITS

Christopher J. Burkhardt, PWS
Environmental Services Manager

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