

Limited Asbestos Survey Report



HEALTH & SAFETY • ENGINEERING • ENVIRONMENTAL

1553 West Todd Drive, Suite 201 - Tempe, AZ 85283
tel 480-460-8334 fax 480-460-8335 csceng.com

Presented To:

Barbara Wethington
Project Manager
Weston Solutions, Inc.
960 West Elliot Road, Suite 201
Tempe, Arizona 85284

Project:

Sun Chief Mill Site - Bunker
Southeast Corner of Arizona Highway 70 & US 77
Globe, AZ

CSC Project # 5002357

Inspection Dates: January 26-28, 2010

Report Date: February 9, 2010

TABLE OF CONTENTS

| | |
|---|----------|
| 1. PROJECT SUMMARY | 3 |
| 2. EXECUTIVE SUMMARY | 4 |
| 3. ASBESTOS BULK SAMPLING METHODOLOGY | 4 |
| 4. PLM ASBESTOS BULK ANALYSIS LABORATORY | 4 |
| 5. PLM ASBESTOS BULK SAMPLE RESULTS | 5 |
| 6. CONCLUSIONS AND RECOMMENDATIONS | 5 |
| 7. LIMITATIONS | 5 |
| 7.1 USE BY THIRD PARTIES | 5 |
| 7.2 UNIDENTIFIABLE CONDITIONS | 6 |
| 8. SITE DIAGRAM..... | 7 |

ATTACHMENTS:

ASBESTOS LAB PLM BULK RESULTS & CHAIN OF CUSTODY
AHERA BUILDING INSPECTOR CERTIFICATES



1. Project Summary

Project Name & Address: Limited Asbestos Survey
Sun Chief Mill Site - Bunker
Southeast Corner of Highways 70 & 77
Globe, AZ

CSC Project Number: 5002357

Client: Barbara Wethington, Project Manager
Weston Solutions, Inc.
960 West Elliot Road, Suite 201
Tempe, Arizona 85284
Phone: 480-477-4900
Email: b.wethington@WestonSolutions.com

On Site Contact: Steve Kleinheider, Site Manager
Weston Solutions, Inc.
960 West Elliot Road, Suite 201
Tempe, Arizona 85284

Consultant: Clark Seif Clark, Inc. (CSC)
1553 West Todd Drive - Suite 201
Tempe, Arizona 85283
Phone: 480-460-8334
Fax: 480-460-8335

Project Manager: Derrick A. Denis, CIAQP, CAC, CIEC

AHERA Building Inspector: Robert E. Crawley
AHERA Building Inspector # E2412, Expires April, 2010

Inspection and sampling date: January 26, 2010

Report date: February 9, 2010



2. Executive Summary

Barbara Wethington of Weston Solutions, Inc. retained Clark Seif Clark, Inc. (CSC) to perform a limited asbestos survey at the Sun Chief Mill Site located at the southeast corner of Arizona Highway 77 and US 70 near Globe, Arizona (referred to hereunder as the subject property). The survey was specific to the Bunker.

On January 26, 2010 CSC industrial hygiene consultant and AHERA Building Inspector, Robert Crawley (#E2412 expires April, 2010) performed a visual inspection and collected asbestos bulk samples of suspect asbestos containing building materials throughout the subject property that were readily accessible. A total of three (3) bulk asbestos samples of what appeared to be one (1) homogeneous material were collected at the subject property for PLM analysis.

The analytical results indicate that the following building materials **do NOT contain asbestos**:

- Concrete (foundation/bunker/forms)

3. Asbestos Bulk Sampling Methodology

Asbestos bulk samples were collected and placed in zip-lock bags for laboratory analysis. This sampling was performed to identify asbestos in specific suspect asbestos containing materials (ACM). The samples were submitted for standard turn around time analysis via polarized light microscopy (PLM).

The PLM method is the most commonly used method to analyze building materials for the presence of asbestos. The PLM method is in accordance with the EPA Interim Method of the Determination of Asbestos in Bulk Samples (EPA, July 1993). This method utilizes the optical properties of minerals to identify the selected constituent. The use of this method enables identification of the type and the percentage of asbestos in a sample.

The detection limit of the PLM method for asbestos identification is approximately one percent (1%) asbestos. CSC recommends Transmission Electron Microscopy (TEM) or Point Counting analysis for asbestos samples with trace, or less than one percent (<1%) when analyzed via PLM.

In some cases, samples collected from an apparently homogeneous material and yielding mixed results may, in fact, have been taken from different homogeneous materials displaying similar visual characteristics but composed of different constituents. Although materials may appear to be homogeneous, different manufacturers may have produced them in different batches. Materials, which appear to be homogeneous but yield mixed results, are typically assumed, in accordance with AHERA procedures, to be asbestos containing in all areas where the materials are located.

4. PLM Asbestos Bulk Analysis Laboratory

Collected asbestos bulk samples were submitted under chain of custody for standard turn around PLM analysis under chain of custody to CSC laboratory in Chatsworth, California. CSC laboratory is NVLAP (#200324) accredited for bulk (PLM) asbestos analysis.



5. PLM Asbestos Bulk Sample Results

Positive samples identify building components as ACM. Asbestos containing materials are regulated materials. ACM scheduled for disturbance or in poor condition are subject to handling and disposal according to all local, state, and federal regulations.

On January 26, 2010, a total of three (3) bulk asbestos samples of what appeared to be one (1) homogeneous material were collected at the subject property for PLM analysis. Quantities of the material were not determined while on site.

The analytical results indicate that the following building materials **do NOT contain asbestos**:

- Concrete (foundation/bunker/forms)

6. Conclusions and Recommendations

1. No asbestos was detected at the Sun Chief Mill Bunker building location in the samples collected.
2. If suspect asbestos containing materials other than those tested are encountered, they must be assumed to contain asbestos or tested and proven otherwise.

7. Limitations

The field observations, measurements, and research reported herein are considered sufficient in detail and scope to determine the asbestos content of the tested materials at the subject property. The assessment, conclusions, and recommendations presented herein are based upon specifically limited data. They do not represent all conditions at the subject property as they reflect the information gathered for specific building systems. CSC warrants the findings and conclusions contained herein have been promulgated in accordance with generally accepted industrial hygiene methodology and only for the site described in this report.

7.1 Use by Third Parties

This report was prepared pursuant to the contract CSC has with the client. That contractual relationship included an exchange of information about the subject property that was unique and between CSC and its client and serves as the basis upon which this report was prepared. Because of the importance of the communication between CSC and its client, reliance or any use of this report by anyone other than the client, for whom it was prepared, is prohibited and therefore not foreseeable to CSC.

Reliance or use by any such third party without explicit authorization in the report does not make said third party a third party beneficiary to CSC's contract with the client. Any such unauthorized reliance on or use of this report, including any of its information or conclusions, will be at third party's risk. For the same reasons, no warranties or representations, expressed or implied in this report, are made to any such third party.



7.2 Unidentifiable Conditions

This asbestos related environmental consulting report has been developed to provide the client with information regarding apparent conditions related to limited accessible building materials in the subject property. Although CSC believes that the findings and conclusions provided in this report are reasonable, the assessment is necessarily limited to the conditions observed and to the information available at the time of the work. Due to the nature of the work, there is a possibility conditions exist that could not be identified within the scope of the assessment or which were not apparent at the time of our site work. The assessment is also limited to information available from the client at the time it was conducted. It is also possible that the testing methods employed at the time of the report may later be superseded by other methods. CSC does not accept responsibility for changes in the state of the art.

Clark Seif Clark, Inc. does not guarantee that all contaminated areas in the subject property were recognized during our evaluation. This report is limited only to the samples taken and locations sampled. Additional sampling may be needed to further identify other pollutants, or other affected areas inside the property.

We have employed state-of-the-art practices to perform this analysis of risk and identification, but this evaluation is limited in scope to the areas listed above. Our services consist of professional opinions and recommendations made in accordance with generally accepted engineering principles and practices, and are designed to provide an analytical tool to assist the client.

Clark Seif Clark or those representing Clark Seif Clark bear no responsibility for the actual condition of the structure or safety of a site pertaining to IAQ contamination regardless of the actions taken by the client.

Thank you for choosing Clark Seif Clark, Inc. to provide professional consulting services. If for some reason you have any questions regarding this report, please do not hesitate to contact us.

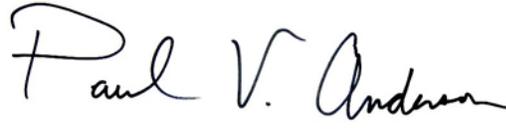
Thank you,
Clark Seif Clark, Inc.

Written by,



Robert E. Crawley, CIEC
AHERA Building Inspector E2412,
Expires April, 2010

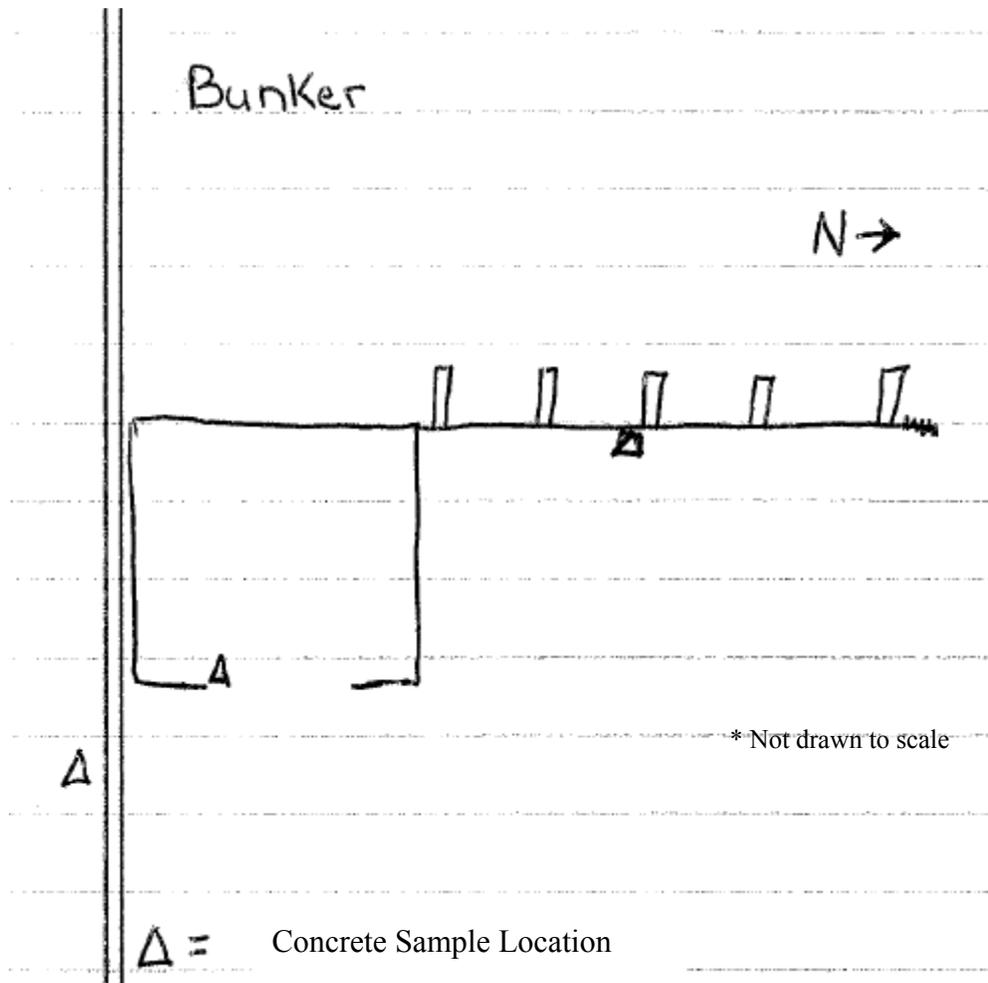
Reviewed and Approved by,



Paul V. Anderson, MS, CIEC
AHERA Building Inspector E2951
Expires June, 2010



8. SITE DIAGRAM





EMSL Analytical, Inc.
 3539 East Broadway, Phoenix, AZ 85040

Phone: (602) 276-4344 Fax: (602) 276-4053 Email: phoenixlab@emsl.com

Attn: **Robert Crawley**
Clark Seif Clark, Inc.
1553 W. Todd Drive
Suite 201
Tempe, AZ 85283

Customer ID: CLAR63
 Customer PO:
 Received: 01/29/10 1:52 PM
 EMSL Order: 121000394

Fax: (480) 460-8335 Phone: (480) 460-8334
 Project: **5002357 Sun Chief Mill**

EMSL Proj:
 Analysis Date: 2/3/2010

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

| Sample | Description | Appearance | Non-Asbestos | | Asbestos |
|----------------------------|-----------------|------------------------------------|--------------|---------------------------------------|----------------------|
| | | | % Fibrous | % Non-Fibrous | % Type |
| 1 <i>121000394-0001</i> | S Foundation | Gray Non-Fibrous Homogeneous | | 90% Non-fibrous (other) 10% Quartz | None Detected |
| 2 <i>121000394-0002</i> | Bunker Entrance | Gray Non-Fibrous Homogeneous | | 90% Non-fibrous (other) 10% Quartz | None Detected |
| 3 <i>121000394-0003</i> | Center Form | Gray Non-Fibrous Homogeneous | | 90% Non-fibrous (other) 10% Quartz | None Detected |

Analyst(s)

Carlos Rivadeneira (3)

Janice Jones, Laboratory Manager
 or other approved signatory

Due to magnification limitations inherent in PLM, asbestos fibers in dimensions below the resolution capability of PLM may not be detected. The limit of detection as stated in the method is 1%. The above test report relates only to the items tested and may not be reproduced in any form without the express written approval of EMSL Analytical, Inc. EMSL's liability is limited to the cost of analysis. EMSL bears no responsibility for sample collection activities or analytical method limitations. Interpretation and use of test results are the responsibility of the client. Samples received in good condition unless otherwise noted. This report must not be used to claim product endorsement by NVLAP or any agency of the U.S. Government.
 Samples analyzed by EMSL Analytical, Inc. 3539 East Broadway, PhoenixAZ NVLAP Lab Code 200811-0, AZ0937

E 2412

THE ASBESTOS INSTITUTE

Certifies that

Robert E Crawley

has attended the EPA approved course
AHERA Refresher
Building Inspector
April 3, 2009
and successfully passed the competency exam.

Date of Examination: **April 3, 2009**

Date of Expiration: **April 3, 2010**



Director



Approved Instructor

THE ASBESTOS INSTITUTE

8102 North 23rd Avenue

Suite A

Phoenix, AZ 85021-4962

602-864-6564

This training meets all requirements for asbestos accreditation under TSCA Title II.