

Limited Asbestos Survey Report



HEALTH & SAFETY • ENGINEERING • ENVIRONMENTAL

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Presented To:

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

Project:

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

CSC Project # 5002357

Inspection Dates: January 26-27, 2010

Report Date: February 18, 2010

TABLE OF CONTENTS

1. PROJECT SUMMARY	3
2. EXECUTIVE SUMMARY	4
3. ASBESTOS BULK SAMPLING METHODOLOGY	4
4. PLM ASBESTOS BULK ANALYSIS LABORATORY	5
5. PLM ASBESTOS BULK SAMPLE RESULTS	5
6. CONCLUSIONS.....	5
7. RECOMMENDATIONS	5
8. LIMITATIONS	6
8.1 USE BY THIRD PARTIES.....	6
8.2 UNIDENTIFIABLE CONDITIONS	7
9. SITE DIAGRAM.....	8
10. SITE PHOTOS	9

ATTACHMENTS:

ASBESTOS LAB PLM BULK RESULTS & CHAIN OF CUSTODY
ASBESTOS LAB POINT COUNTING RESULTS & CHAIN OF CUSTODY
AHERA BUILDING INSPECTOR CERTIFICATE



1. Project Summary

Project Name & Address: Limited Asbestos Survey
Sun Chief Mill Site - Mill Buildings
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 18, 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 Mill Buildings.

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 Mill Buildings that were readily accessible. A total of twelve (12) bulk asbestos samples of what appeared to be four (4) homogeneous materials were collected at the Mill Buildings for PLM analysis.

The analytical results indicate that the following building materials **DO contain asbestos**:

- Beige Paint
 - (0.47% - 0.71% chrysotile asbestos via Point Counting)

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

- Off-white Window Putty
- Concrete Foundation
- Block and Mortar

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 to CSC laboratory in Chatsworth, California. CSC laboratory is NVLAP (#200324) accredited for bulk (PLM) asbestos analysis.

The beige paint samples were sent to LA Testing in Pasadena CA to be re-analyzed. Samples with detectable asbestos were analyzed via EPA 600/R-93/116 (Quantitation using 400 Point Count Procedure) while the sample that did not contain asbestos was re-analyzed by PLM. LA Testing is NVLAP accredited (Lab Code 200232-0) for PLM and Point Counting.

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 twelve (12) bulk asbestos samples of what appeared to be four (4) homogeneous materials were collected at the subject property for PLM analysis.

The analytical results indicate that the following building materials **DO contain asbestos**:

- Beige Paint
 - (0.47% - 0.71% chrysotile asbestos via Point Counting)

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

- Off-white Window Putty
- Concrete Foundation
- Block and Mortar

6. Conclusions

1. The beige paint was found to contain asbestos fibers ($\leq 1\%$ Chrysotile).
 - a. Flaking and peeling paint should be considered a friable material.
 - b. Point Counting is the considered more accurate than PLM when quantifying asbestos content as the PLM method is an estimation. Therefore, reported asbestos quantities are those detected via Point Counting.

7. Recommendations

1. If suspect asbestos containing materials other than those tested are encountered, they must be assumed to contain asbestos or tested and proven otherwise.



2. Removal of the beige paint containing $\leq 1\%$ Chrysotile throughout the subject property should be considered unclassified work; therefore, the EPA NESHAPS regulations are not applicable to the beige paint or materials containing beige paint. However, OSHA regulates demolition or repairs of the friable materials that contain less than 1% asbestos. According to OSHA, work conducted in areas where the asbestos or asbestos product is below one percent is "unclassified asbestos work". For such "unclassified work", the employer still must follow the requirements in the OSHA Occupational Exposure to Asbestos standard 29 CFR 1926.1101(g)(1)(ii) and (iii), as well as the record keeping requirements under 29 CFR 1926.1101(n). In brief the standards require:
 - a. Worker training (awareness or greater)
 - b. Exposure assessment (air monitoring data during work)
 - c. If there is a potential to be exposed to greater than the PEL, a competent person needs to evaluate the job for the likelihood of exposure
 - d. Wet methods
 - e. Prompt cleanup
 - f. Disposal in leak tight containers (not necessarily bags)
 - g. HEPA vacuum
 - h. If the employer chooses to establish a negative exposure assessment, then 29 CFR 1926.1101(n) requires that the employer demonstrate that materials are not capable of releasing fibers of asbestos in concentrations at or above the permissible exposure limit and/or excursion limit under the expected conditions of handling. Also the employer shall establish and maintain an accurate record of objective data reasonably relied upon in support of the exemption. CSC can perform negative exposure assessment if needed.
3. A complete copy of this survey must be kept on site during asbestos abatement activities.

8. 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.

8.1 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.

8.2 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.

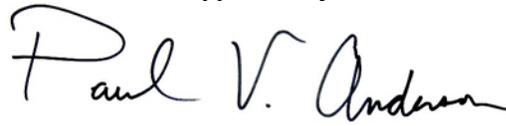
Thank you,
Clark Seif Clark, Inc.

Written by,



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

Reviewed and Approved by,

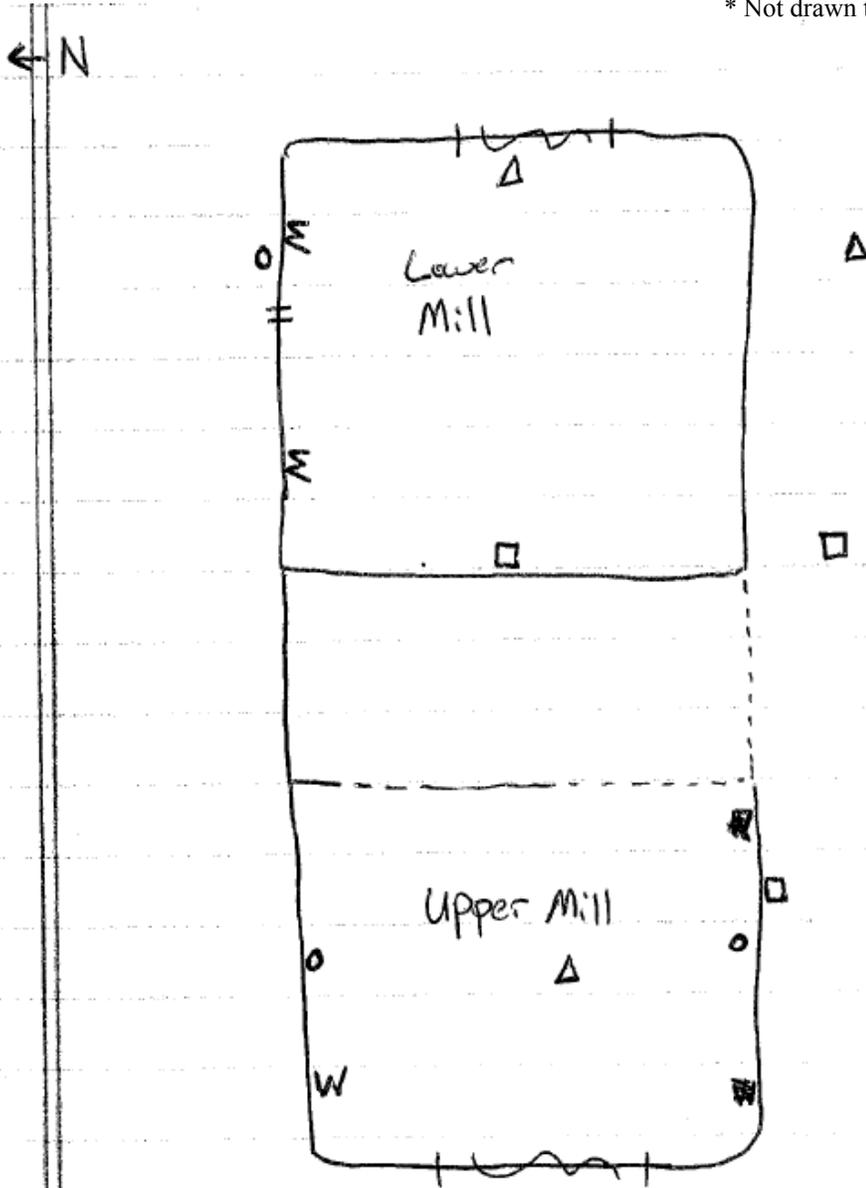


Paul V. Anderson, MS, CIEC
AHERA Building Inspector E2951
Expires June, 2010



9. Site Diagram

* Not drawn to scale



- = Beige Paint
- △ = Concrete
- W = White Window Caulk
- = Block Wall & Mortar



10. Site Photos



Photo 1: Mill Buildings – subject property north elevation



Photo 2: Mill Buildings – example of southeast elevation



Photo 3: Mill Buildings – inside lower building looking west



Photo 4: Mill Buildings – example of off-white window putty





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Asbestos Bulk Sampling Chain of Custody

Requested Turn-around time

STANDARD
RUSH

99005286

CSC Project #	Sampling By	Date Taken	# Samples	Page #	Of	Total Pages
5002357	Robert Crawley	1-26-10	12	1		1

Project Name & Location	Client Info:
SunChief Mill Globe, AZ	Weston Solutions Tempe AZ c/o B. Wethington
Building #:	Lab Submitted to:
Mill Site	

ID #	Material Description	HM	Sample Location	Condition	Friability	Quantity
1	off white Window Putty	1	Upper mill W	P	Y	~50g
2	↓	1	Lower mill W	↓	↓	↓
3	↓	1	Lower mill E	↓	↓	↓
4	Beige Paint	2	Upper mill S Interior Wall	P		TBD
5	↓	2	Upper mill N Interior Wall	↓		↓
6	↓	2	Lower mill N Exterior Wall	↓		↓
7	Concrete	3	Upper mill Interior	G	N	TBD
8	↓	3	Lower mill SE Exterior	↓	↓	↓
9	↓	3	Lower mill Interior	↓	↓	↓
10	Block & Mortar	4	Upper mill Exterior S	G	N	TBD
11	↓	4	Lower mill Exterior SW	↓	↓	↓
12	↓	4	Lower mill Interior Center	↓	↓	↓

CONDITION CODE			FRIABLE CODE		HOMOGENEOUS CODE		QUANTITY CODE	
G= GOOD	F= FAIR	P= POOR	Y= YES	N= NO	HA= HOMOGENEOUS MATERIAL		SF= Square Ft.	LF= LINEAR Ft.

Notes:

Relinquished By:	Received by:	Date & Time
<i>[Signature]</i>		1/29/10 e-mail to FedEx
Relinquished By:	Received by:	Date & Time
	<i>[Signature]</i>	2-2-10 1200





Asbestos Bulk Sample Analysis Summary

[Performed by EPA 600/R-93/116 Method]

Project Site: Sun Chief Mill
Globe, AZ

CSC Project / Lab # : 99005286

Samples : 12

Sampling By : Robert Crawley

Date Sampled : 1/26/2010

Date Received : 2/2/2010

Date Reported : 2/4/2010

CSC Job Ref. ID : 5002357

Client Name: Weston Solutions, Inc. (5000786)
Barbara Wethington
Department: Project Manager
Suite 201
960 West Elliot Road
Tempe, AZ 85284

Lab Client ID #	Sample #	Material Description	Location	Asbestos Type & %	Fibrous Non-Asbestos	Nonfibrous Non- Asbestos
2357 B-1	5286-1	Window Putty Off White	Mill Site - Upper Mill, W	ND	ND	100% Matrix Material
2357 B-2	5286-2	Window Putty Off White	Mill Site - Lower Mill, W	ND	ND	100% Matrix Material
2357 B-3	5286-3	Window Putty Off White	Mill Site - Lower Mill, E	ND	ND	100% Matrix Material
2357 B-4	5286-4	Paint Beige	Mill Site - Upper Mill, S Interior Wall	2% Chrysotile	1% Cellulose	97% Matrix Material
2357 B-5	5286-5	Paint Beige	Mill Site - Upper Mill, N Interior Wall	2% Chrysotile	2% Cellulose	96% Matrix Material
2357 B-6	5286-6	Paint Beige	Mill Site - Lower Mill, N Exterior Wall	ND	1% Cellulose	99% Matrix Material
2357 B-7	5286-7	Concrete Tan	Mill Site - Upper Mill, Interior	ND	ND	100% Matrix Material
2357 B-8	5286-8	Concrete Tan	Mill Site - Lower Mill, SE Exterior	ND	ND	100% Matrix Material
2357 B-9	5286-9	Concrete Tan	Mill Site - Lower Mill, Interior	ND	ND	100% Matrix Material
2357 B-10	5286-10	Block and Mortar Gray	Mill Site - Upper Mill, Exterior S	ND	ND	100% Matrix Material

CSC Project / Lab # : 99005286

Address: Globe, AZ

2357 B-11	5286-11	Block and Mortar Gray	Mill Site - Lower Mill, Exterior SW	ND	ND	100% Matrix Material
2357 B-12	5286-12	Block and Mortar Gray	Mill Site - Lower Mill, Interior Center	ND	ND	100% Matrix Material

Bulk Material Analysis:

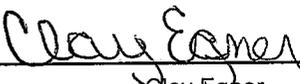
Bulk samples are examined by Polarized Light Microscopy (PLM) with Dispersion Staining as recommended by the U.S. Environmental Protection Agency (EPA).

Results:

Results are reported as a percent(%) of total asbestos present for each asbestos type identified within each distinguishable layer, or sub-sample, of a sample. Other non-asbestos materials may also be identified.

Explanation:

Reported results are a visual estimate by area of asbestos concentration. Results for heterogeneous samples examined by component are reported as a composite. The lower limit of reliable detection for the PLM methods is 1%. Samples which contain asbestos in a concentration lower than the limit of reliable detection (<1%) commonly referred to as "trace" are reported as "<1%". Trace is defined as reproducible detection levels of asbestos with at least five fibers spread over three slides, per NIST Proficiency Test instructions. Samples in which no asbestos is observed are reported as ND (None Detected). Note: When ND appears on a report, it means that asbestos was not observed and that, if present, it exists in concentrations of <1% and/or fiber dimensions are too small for accurate microscopic resolution. CSCL is accredited by the National Voluntary Laboratory Accreditation Program for the specific scope of accreditation under NVLAP Lab Code 200324. Results reported relate only to sample(s) submitted and tested and do not necessarily apply to other apparently identical or similar materials. This report is submitted for the exclusive use of the client to whom it is addressed. Any reproduction of this report or use of this Laboratory's name for advertising or publicity purposes without prior written authorization is prohibited. In addition, this report is not to be used to claim product endorsement by NVLAP or any agency of the U.S. Government.



 Clay Egner
 Laboratory Analyst

 Christian Goerrissen
 Laboratory Analyst/Manager

Note: Our policy is to dispose of samples unless written notification is received in our office within 30 days of this report.



LA Testing

520 Mission Street, South Pasadena, CA 91030

Phone: (323) 254-9960 Fax: (323) 254-9982 Email: pasadenalab@latesting.com

Attn: **Robert Crawley**
Clark Seif Clark, Inc.
1553 W Todd Drive - Suite201
Tempe,, AZ 85283

Customer ID: 32CLAR63
Customer PO:
Received: 02/10/10 9:50 AM
LA Testing Order: 321001607

Fax: (480) 460-8335 Phone: (480) 460-8334

Project: **5002357 / Sun Chief Mill Globe, AZ / Mill Site**

LA Testing Proj:
Analysis Date: 2/16/2010

Test Report: Asbestos Analysis of Bulk Material via EPA 600/R-93/116. Quantitation using 400 Point Count Procedure.

Sample	Description	Appearance	Non-Asbestos		Asbestos
			% Fibrous	% Non-Fibrous	% Type
4 321001607-0001	Upper mill - S interior wall	Beige Non-Fibrous Heterogeneous		99.29% Non-fibrous (other)	0.71% Chrysotile
5 321001607-0002	Upper mill - N interior wall	Beige Non-Fibrous Heterogeneous		99.53% Non-fibrous (other)	0.47% Chrysotile

Report Amended: 2/16/2010 2:14:22 PM Replaces the Inital Report . Reason Code: Client-Samples Added

Analyst(s) _____

Kieu-anh Pham Duong (2)

Derrick Tanner, Laboratory Manager
or other approved signatory

Disclaimer: Some samples may contain asbestos fibers present in dimensions below PLM resolution limits. LA Testing suggests that samples reported as <0.25% or none detected undergo additional analysis via TEM. The above test report relates only to the items tested. This report may not be reproduced, except in full, without written approval of LA Testing. This test report must not be used by the client to claim product endorsement by NVLAP or any agency of the United States Government. LA Testing, bears no responsibility for sample collection activities, analytical method limitations, or the accuracy of results when requested to separate layered samples. LA Testing, liability is limited to the cost of sample analysis. Samples received in good condition unless otherwise noted.

Samples analyzed by LA Testing 520 Mission Street, South PasadenaCA NVLAP Lab Code 200232-0



LA Testing

520 Mission Street, South Pasadena, CA 91030

Phone: (323) 254-9960 Fax: (323) 254-9982 Email: pasadenalab@latesting.com

Attn: **Robert Crawley**
Clark Seif Clark, Inc.
1553 W Todd Drive - Suite201
Tempe,, AZ 85283

Customer ID: 32CLAR63
Customer PO:
Received: 02/10/10 9:50 AM
LA Testing Order: 321001607

Fax: (480) 460-8335 Phone: (480) 460-8334
Project: **5002357 / Sun Chief Mill Globe, AZ / Mill Site**

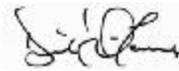
LA Testing Proj:
Analysis Date: 2/12/2010

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
6 321001607-0003	Lower mill - N exterior wall	Beige Non-Fibrous Homogeneous		100% Non-fibrous (other)	None Detected

Analyst(s)

Kieu-anh Pham Duong (1)



Derrick Tanner, Laboratory Manager
or other approved signatory

Due to magnification limitations inherent in PLM, asbestos fibers in dimensions below the resolution capability of PLM may not be detected. Samples reported as <1% or none detected may require additional testing by TEM to confirm asbestos quantities. The above test report relates only to the items tested and may not be reproduced in any form without the express written approval of LA Testing. LA Testing's liability is limited to the cost of analysis. LA Testing bears no responsibility for sample collection activities or analytical method limitations. Interpretation and use of test results are the responsibility of the client. The test results contained within this report meet the requirements of NELAC unless otherwise noted. Samples received in good condition unless otherwise noted. Samples received in good condition unless otherwise noted.
Samples analyzed by LA Testing 520 Mission Street, South Pasadena CA NVLAP Lab Code 200232-0, CA ELAP 2283

E 2412

THE ASBESTOS INSTITUTE

Certifies that

Robert E Crawley

has attended the EPA approved course
and successfully passed the competency exam.

**AHERA Refresher
Building Inspector
April 3, 2009**

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.