

**BMI COMPLEX OFF SITE/PHASE IIIA
AIR MONITORING SUMMARY REPORT
Revision 1**

Prepared for:

**BASIC REMEDIATION COMPANY
HENDERSON, NEVADA**



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1.0 INTRODUCTION

Basic Remediation Company (BRC) retained Converse Consultants (Converse) and Tetra Tech EM Inc. (Tetra Tech) to complete a short-term air sampling project to evaluate off site emissions from material hauling operations at the Eastside Area of the Basic Environmental Company property located in Clark County, Nevada. This off site air sampling project is the first of a 3-phased approach to evaluate emissions from material hauling, dry pit excavations, and CAMU slit trench excavations.

Tetra Tech set up two temporary air-monitoring stations along Warm Springs Road and collected two air samples per week from November 4, 2008 – December 2, 2008. One additional sample was collected on December 27, 2008 from each station to evaluate background emissions when no hauling was occurring. Equipment was set up at each of the two stations to collect ambient air samples over a twelve hour (hr) period from approximately 7:00 P.M. to 7:00 A.M.

The sampling parameters were based on the BRC *Perimeter Air Monitoring Plan* (PAMP) (October 2008) and *Revised Draft BMI Complex Air Quality Monitoring Project – Phase III – Summary of Sampling Approach and Chemicals of Concern at Eastside and CAMU Areas* (Tetra Tech October 2008) reviewed and approved by the Nevada Division of Environmental Protection (NDEP). Two identical air-sampling stations were constructed and the sampling equipment at each of the two sites consisted of:

- Three identical polyurethane foam (PUF) hi-volume federal reference method (FRM) samplers designed to collect samples on three PUF cartridges for analysis of organic compounds contained in the U.S. Environmental Protection Agency (EPA) compendium methods TO-4, TO-9 and TO-13
- One portable BGI PQ100 low-volume FRM (PQ100) sampler designed to collect samples on 47mm Teflon filters for analysis of total suspended particulate (TSP) and total metal
- One SKC Model 224-PCXR8 (SKC) low-volume sample pump designed to collect samples on mixed cellulose ester (MCE) filters for analysis of asbestos using National Institute for Occupational Safety and Health (NIOSH) Method 7400 for phase contrast microscopy
- One Honda EB 6500 gasoline-powered generators (or equivalent)

This report summarizes sample collection, analyses methodology, and analytical data collected between November 4, 2008 and December 27, 2008. The sampling approach, methodology, and summary of activities are presented in Section 2.0. The analytical data results are presented in Section 3.0. NDEP comments and BRC response to comments are presented in Appendix A; Field documentation forms are provided in Appendix B; laboratory analytical data reports are provided in Appendix C; calibration and sample volume calculation worksheets are provided in Appendix D; a CD containing an electronic copy of the report, tables, and track changes version of report is provided in Appendix E.

2.0 SAMPLING APPROACH

Two temporary air monitoring stations were set up along Warm Springs Road in Henderson, Nevada to collect air samples during nighttime material hauling operations from the Eastside area to the Corrective Area Management Unit (CAMU) area.

2.1 SITE SELECTION AND LOCATIONS

Based on the prevailing wind direction at the BMI Complex, two air monitoring stations were placed along the north and south side of Warm Springs Road. Site OFF-02 was located to represent potential upwind conditions and Site OFF-01 was located to represent potential downwind conditions. The air monitoring station locations are presented in Figure 1.

2.2 SAMPLING EQUIPMENT CALIBRATION AND OPERATION

Tetra Tech assembled and calibrated the PUF, PQ100, and SKC air samplers prior to sample collection and after equipment had been serviced (battery changes). All samplers were calibrated using National Institute of Standards and Testing (NIST) or other authoritative reference certified equipment.

The initial calibrations on the PUF, BGI PQ100, and SKC samplers only required minor adjustments to set correct flow rates, but no major adjustments or equipment failures were observed. All equipment was checked again before sample collection began to ensure the correct flow rate(s) and timer operation.

Tetra Tech performed all calibrations according to EPA reference methods and all equipment was found to be within the calibration acceptance criteria prior to sample collection and equipment was operating within project goals. Equipment calibration worksheets are provided in Appendix D.

All samplers were powered by portable gas-powered generators for each sample event. At the beginning of each sample event, Tetra Tech transported the generators and air sampling equipment to each sample station. Samplers were set up and programmed at each station prior to sampling and subsequently removed after the completion of each sample event. Each station consisted of a sampling platform enclosed in an approximately 16 foot (ft) by 16 ft by 8 ft high chain link fence secured with a locking gate. Air samplers were secured to the platforms during the sample events.

The sampling approach proposed by BRC and Tetra Tech and approved by NDEP was to collect 12-hr samples twice per week from approximately 7:00 P.M. to 7:00 A.M. over a four week period during daily nighttime hauling operations.

The first sample event occurred on November 4, 2008 and sampling continued through December 2, 2008. Based on subsequent discussions with NDEP, BRC and Tetra Tech agreed to collect additional samples on December 27, 2008 to evaluate background emissions when material hauling was not occurring. A generator was stolen from site OFF-01 on or about November 20, 2008 and as a result no samples were collected on November 21, 2008. In addition, only one sample was collected during the week of Thanksgiving (November 27, 2008).

All sample parameters were documented on BMI Complex field documentation forms before and after each sample event. In total, eight sample events were completed on the following dates:

- November 4, November 7, November 10, November 14, November 18, November 25, December 2, December 8 (Field Blank) and December 27, 2008 (background/non-hauling sample)

2.3 SAMPLE NOMENCLATURE

All samples collected at the BMI Complex were given a sample ID according to the sample location and sample date as follows:

- OFF-01-110408 (where OFF denotes off site location, 01 denotes site #1 and 0110408 denotes that sample was collected on November 4, 2008)

2.4 SAMPLE PARAMETERS

Air samples were collected at the established monitoring stations for the analysis of site related chemicals including organochlorine pesticides, Polychlorinated Dibenzo-p-dioxins (PCDDs), Polychlorinated Dibenzo-p-furans (PCDFs), Polychlorinated biphenyls (PCBs), VOCs/SVOCs, TSP, metals, and asbestos fibers. The sampling and analysis procedures are summarized below. For all samples collected at the BMI Complex, field blanks were collected on a frequency of 10 percent (one in 10 samples) for quality control purposes. Upon completion of each sample event, the samples and associated information was recorded on chain-of-custody (COC) sheets and submitted to the respective laboratories for analysis. The COC included the sample identification number, sample location, sample time, beginning and ending flow rate (to calculate sample volume) and the required analysis. A summary of sample collection, sample handling, and analysis specifications procedures is provided in Table 2.

2.4.1 ORGANIC COMPOUNDS

At each sampling location, three PUF samplers were used to collect PUF samples for the analysis of organochlorine pesticides, PCDDs, PCDFs, PCBs, and VOCs/SVOCs using EPA Compendium Methods TO-4, TO-9, and TO-13. The PUF samplers draw approximately 0.2 cubic meters per minute of ambient air onto a 102 millimeter (mm) diameter quartz glass filter followed by a polyurethane foam plug and XAD resin contained in a glass cartridge. The TO-9 and TO-13 samples were analyzed using gas chromatography and mass spectrometry (GC/MS) and the TO-4 samples were analyzed using GC/Multi-Detector Detection (GC/MD). All PUF (organic) samples were submitted with COC form(s) to Air Toxics Ltd. Laboratory and Frontier Ltd. Laboratory for analysis. A summary of sample collection, sample handling, and analysis specifications procedures is provided in Table 2.

2.4.2 TOTAL SUSPENDED PARTICULATE MATTER AND METALS

At each sampling location, one PQ100 sampler was used to collect samples for TSP and metals. The PQ100 sampler draws approximately 0.0167 cubic meters per minute (approximately 12 total cubic meters) of ambient air onto the filter media. The TSP and metals samples were collected using 47 mm Teflon filter media and analyzed using USEPA Compendium Method IO-2.1 (gravimetric analysis). The TSP samples underwent additional analysis for metals using USEPA Compendium Method IO-3.3 X-Ray Fluorescence (Protocol number 6). All TSP and metals samples were submitted with COC form(s) to Chester Labnet Laboratory for analysis. A summary of sample collection, sample handling, and analysis specifications procedures is provided in Table 2.

2.4.3 ASBESTOS

At each sampling location, one SKC low volume sampler was used to collect samples for asbestos analysis using NIOSH Method 7400. The sampling system consisted of a low-flow pump attached to a 25-millimeter MCE filter. The SKC samplers draw approximately 1 liter per minute (lpm) (approximately 720 total liters) of ambient air onto the MCE filter. The samples were analyzed using NIOSH Method 7400 (Phase Contrast Light Microscopy). All asbestos samples were submitted with COC form(s) to AESL Laboratory for analysis. A summary of sample collection, sample handling, and analysis specifications procedures is provided in Table 2.

2.5 SIGNIFICANT SITE-RELATED EVENTS

A generator was stolen from site OFF-01 on or about November 20, 2008 and as a result no samples were collected on November 21, 2008. Upon discovery, Tetra Tech personnel immediately notified BRC and Weston Solutions personnel and filed a police report with the Henderson Police Department.

A non-haul day sample event was conducted on December 27, 2008. Therefore all air quality data collected on this date represents air quality when no BMI-related hauling operations were occurring.

3.0 ANALYTICAL RESULTS

The air quality sample data collected at the off site locations represents a wide range of chemical compounds as presented in the PAMP. All sample data was compared to EPA Region 3 risk-based concentrations (RBC) table (April 2006), EPA Region 9 preliminary remediation goals (PRG) table (October 2004), and EPA Region 6 human health medium-specific screening levels (MSSL) table (March 2008) to determine if ambient concentrations exceeded criteria. In most cases the RBC, PRG, and MSSL were either identical or very close in chemical concentration.

The sample results demonstrate that the majority of organic (PUF) compounds were not detected in measurable concentrations in ambient air at the off site locations. However, a limited number of organic compounds were detected and have been further evaluated. In addition, TSP, metals, and airborne fibers were detected. A summary of analytical results for each subset of chemical compounds is provided below.

3.1 UPWIND AND DOWN WIND ANALYSIS

Tetra Tech developed an approach for the quantification of upwind versus downwind air quality monitoring data collected during this short-term air sampling project at the BMI Complex Site. The objective of the upwind/downwind evaluation is to evaluate if the material hauling operations contributed to the degradation of the existing air quality in the vicinity of the work area. However, it must be noted that this analysis was performed with a very limited meteorological dataset of only seven sample events and only represents meteorological conditions measured during November and December 2008.

3.1.1 DATA SUMMARY

The upwind/downwind evaluation was conducted using meteorological data and on-site data collected at sites OFF-01 and OFF-02. Meteorological data including wind speed and direction were measured continuously at the on-site meteorological monitoring station operated by Tetra Tech near the Eastside entrance gate.

3.1.2 APPROACH

The general approach for conducting the upwind/downwind evaluation consists of the following steps:

- Determine predominant wind directions
- Assign upwind/downwind stations
- Compare upwind/downwind results
- Determine those air sample results that exceeded either the RBC or PRG screening criteria
- Conduct a statistical analysis

3.1.3 DETERMINE PREDOMINANT WIND DIRECTION

If the wind is variable, assigning a predominant wind direction may be subject to qualitative interpretations.

Tetra Tech defined predominant wind direction based on the following criteria:

- At least 50 percent of wind direction measurements occur in two quadrants (southeast-southwest, or northeast-northwest)

3.1.4 ASSIGN UPWIND/DOWNWIND STATIONS

Meteorological data was recorded for the duration of the eight sample events and the prevailing wind direction was generally from the southwest and southeast. A summary of meteorological data during the sample events is presented in Table 1 below.

**TABLE 1
METEOROLOGICAL DATA RECORD DURING OFF SITE AIR SAMPLING
NOVEMBER 4 – DECEMBER 27, 2008
HENDERSON, NEVADA**

Sample Date	Average Wind Degrees	Average Wind Speed (m/s)	Quadrant Wind Blowing From	Respective Upwind Site	Respective Downwind Site
11/3-11/4/08	202	3.7	S-SW	OFF-02	OFF-01
11/6-11/7/08	193.2	1.03	S	OFF-02	OFF-01
11/10-11/11/08	167.8	0.8	S-SE	OFF-02	OFF-01
11/13-11/14/08	170.5	1	S	OFF-02	OFF-01
11/17-11/18/08	166.8	0.7	S-SE	OFF-02	OFF-01
11/24-11/25/08	164.7	0.9	S-SE	OFF-02	OFF-01
12/1-12/2/08	176.7	0.6	S	OFF-02	OFF-01
12/26-12/27/08	226.8	1.58	SW	OFF-02	OFF-01

3.1.5 COMPARE UPWIND/DOWNWIND RESULTS

To meet project objectives the upwind concentrations of chemical constituents were compared to their corresponding downwind concentrations. The comparison consisted of calculating the percent difference between the upwind and downwind concentrations. This has been completed for all detected chemical compounds.

3.2 TSP AND METALS RESULTS

TSP was detected in all samples and concentrations ranged from $3.85 \mu\text{g}/\text{m}^3$ to $87.77 \mu\text{g}/\text{m}^3$. The average concentration was $27.75 \mu\text{g}/\text{m}^3$. No screening criteria or federal standards currently exist for TSP. An analysis of the percent difference calculation between the upwind site (OFF-02) and downwind site (OFF-01) demonstrated an average percent difference of less than one percent. Therefore it does not appear that material hauling directly impacted ambient TSP concentrations. A complete summary and statistical analysis of all TSP results are presented in Table 3.

Metals were detected in a majority of the TSP samples and concentrations were reported with an uncertainty of plus/minus 2 standard deviations. The XRF detection method identifies concentrations in extremely low concentration ranges (of less than $0.001 \mu\text{g}/\text{m}^3$). The results were compared to the RBC, PRG, and MSSL screening criterion (of those available) and four metals exceeded the criterion: Manganese, Cobalt, Arsenic, and Cadmium.

Manganese concentrations ranged from $0.06 \mu\text{g}/\text{m}^3$ to $1.23 \mu\text{g}/\text{m}^3$ and the average concentration was $0.35 \mu\text{g}/\text{m}^3$. The Manganese PRG and MMSL of $0.051 \mu\text{g}/\text{m}^3$ (RBC of $0.052 \mu\text{g}/\text{m}^3$) was exceeded by all sixteen samples. Cobalt concentrations ranged from $0.0003 \mu\text{g}/\text{m}^3$ to $0.02 \mu\text{g}/\text{m}^3$ and the average concentration was $0.0037 \mu\text{g}/\text{m}^3$. The Cobalt PRG and MSSL of $0.001 \mu\text{g}/\text{m}^3$ was exceeded by six samples. Three of these samples were collected at Site OFF-01 and three samples were collected at Site OFF-02. Arsenic concentrations ranged from $0.0003 \mu\text{g}/\text{m}^3$ to $0.0023 \mu\text{g}/\text{m}^3$ and the average concentration was $0.0011 \mu\text{g}/\text{m}^3$. The Arsenic PRG of $0.0004 \mu\text{g}/\text{m}^3$, RBC of $0.00041 \mu\text{g}/\text{m}^3$, and MSSL of $0.00045 \mu\text{g}/\text{m}^3$ was exceeded by four samples. Two of these samples were collected at Site OFF-01 and two samples were collected at Site OFF-02. Cadmium concentrations ranged from $0.0014 \mu\text{g}/\text{m}^3$ to $0.0059 \mu\text{g}/\text{m}^3$ and the average concentration was $0.0038 \mu\text{g}/\text{m}^3$. The Cadmium RBC of $0.001 \mu\text{g}/\text{m}^3$ and PRG/MSSL of $0.0011 \mu\text{g}/\text{m}^3$ were exceeded by four samples. Two of those samples were collected at Site OFF-01 and two samples were collected at Site OFF-02. It must be noted that all Cobalt, Arsenic,

and Cadmium concentrations were reported at less than three times the XRF analytical uncertainty and have been flagged.

With the limited metals dataset, it is difficult to draw any conclusions regarding air quality impacts from material hauling. However, Manganese warrants further discussion due to the overwhelming amount of exceedances. A review of the *BMI Complex Perimeter Background Air Monitoring Summary Report* (Tetra Tech, September 2008) demonstrates that the Manganese screening criteria was exceeded by nine out of 33 samples. Furthermore, an analysis of the percent difference calculation between the upwind site (OFF-02) and downwind site (OFF-01) demonstrated an average percent difference of approximately -24 percent. Therefore it does not appear that material hauling directly impacted ambient Manganese concentrations. A complete summary and statistical analysis of metals results are presented in Table 3.

3.3 ORGANIC COMPOUND RESULTS

Only two out of twenty seven Organochlorine pesticides (TO-4) chemical compounds were detected above laboratory detection limits and included alpha-BHC and 4,4'-DDE and were only detected during two sample events on 11/25/09 and 12/2/09. Alpha-BHC and 4,4'-DDE were detected at both the upwind site (OFF-02) and downwind site (OFF-01) on 12/2/09 and Alpha-BHC was only detected at the upwind site (OFF-02) on 11/25/08. With only two sample events resulting in detections for each of these compounds this is not enough data to draw conclusions. However, an upwind versus downwind statistical analysis completed for the 12/2/09 event demonstrated a drop of approximately 68 percent and 72 percent for Alpha-BHC and 4,4'-DDE, respectively. A complete summary and statistical analysis of Organochlorine pesticides (TO4A) chemical compounds results are presented in Table 3.

Twenty three PCDDs/PCDFS (TO-9) chemical compounds were detected above laboratory detection limits, but in extremely low concentrations, ranging from 0.02 picograms (pg)/m³ (0.00000002 µg/m³) to 9.89 pg/m³. The total toxic equivalent value (TEQ) was calculated for each of the upwind and downwind samples and compared to the 2,3,7,8-TCDD screening value of 0.045 pg/m³. The upwind versus downwind statistical analysis completed for the data appears to show a consistent increase in concentrations from upwind to downwind. However, six out of seven sample events during hauling operations had TEQ values that exceeded the 0.045 pg/m³ screening value at the upwind site and five out of seven sample events during hauling operations exceeded the 0.045 pg/m³ screening value at the downwind site. In addition, both the upwind and downwind samples collected on the non-haul day

(12/27/09) were below the 0.045 pg/m³ screening criteria. The extremely low sample concentrations coupled with variations in sample volumes could explain the differences in upwind/downwind concentrations during the hauling days. Based on these factors, it is difficult to draw any conclusions from this data or conclusively attribute impacts from material hauling. A complete summary and statistical analysis of PCDDs/PCDFS (TO-9) chemical compounds results are presented in Table 3.

Fourteen VOCs/SVOCs (TO-13) chemical compounds were detected above laboratory detection limits. Of the eighteen detected compounds, two exceeded RBC, PRG, or MSSL screening criteria and included 1,4-Dichlorobenzene and Hexachlorobenzene. Three 1,4-Dichlorobenzene samples exceeded the screening criteria; two from the downwind site and one from the upwind site. Eleven Hexachlorobenzene samples exceeded the screening criteria; five from the downwind site and six from the upwind site. The upwind versus downwind statistical analysis completed for this data shows a consistent increase in measureable concentrations from upwind to downwind and prompted the additional sample event on December 27, 2008 when material hauling was not occurring. BRC believes that significant haul truck emissions could explain the increase in upwind versus downwind VOCs/SVOCs concentrations and initiated subsequent discussions with NDEP. As part of this discussion, BRC provided NDEP with several scientific research journals that evaluated diesel exhaust emissions.

Five (of the fourteen) chemical compounds were detected during the December 27, 2008 (background) sample event and Hexachlorobenzene exceeded the screening criteria for both the upwind and downwind sites demonstrating that other potential sources of these compounds were prevalent in the vicinity of the monitoring sites and may help to better explain the complex nature of chemical emissions near the off site monitoring locations. A complete summary and statistical analysis of VOCs/SVOCs (TO-13) chemical compounds results are presented in Table 3.

3.4 ASBESTOS RESULTS

The asbestos samples were analyzed using NIOSH Method 7400 PCM. The PCM method gives a number index of airborne fibers. It is primarily used for estimating asbestos concentrations, though PCM does not differentiate between asbestos and other fibers. Asbestos fibers include chrysotile, cummingtonite-grunerite asbestos (amosite), anthophyllite asbestos, tremolite asbestos, crocidolite, and actinolite asbestos and any of these minerals which have been chemically treated or altered. The precise chemical formulation of each species varies with the location from which it was mined. Therefore, the

use of PCM is a generally accepted method for screening airborne fibers. The Occupational Safety and Health Administration (OSHA) has set an exposure limit of 0.1 fiber per cubic centimeter (cc) of air as an 8-hour time-weighted average (TWA) and a limit of 1.0 fiber per cc averaged over a sampling period of thirty (30) minutes.

The asbestos samples ranged in concentration from 0 fibers per cc to 0.0026 fibers per cc and the average concentration was 0.0013 fibers per cc. The OSHA TWA limit of 0.1 fibers per cc was not exceeded in any samples and asbestos concentrations at the off site locations were consistent with asbestos concentrations during the perimeter background sampling. A complete summary of all asbestos results are presented in Table 3.

3.5 PATH FORWARD/NEXT STEPS

The off-site sampling represents a significant effort by BRC to address concerns regarding material handling and hauling from the Eastside area to the CAMU area. The sampling was conducted from approximately 7PM to 7AM. Therefore, it can be assumed that normal sources of daytime emissions are reduced and the ambient air concentrations collected at the off-site sampling locations is sufficient to demonstrate that no significant air quality impacts were generated by the material hauling. Based on discussions with NDEP, BRC has agreed to evaluate emissions from the on-site haul vehicles and the BMI plant sites. To evaluate emissions from haul vehicles, air quality samples will be collected from the following vehicles: Caterpillar and John Deere haul trucks and a passenger truck. To evaluate emissions from the BMI plant sites temporary air quality monitoring stations will be installed and operated upwind and downwind from the BMI plant sites.

In addition, air quality data will be incorporated into a single reformatted spreadsheet to facilitate easier review. Additional quality control reviews will be conducted to ensure accuracy. A summary of path forward/next steps is presented below:

- Discontinue air monitoring at the off site locations and moisture-controlled areas.
- Supplement the existing air quality data with background sampling upwind and downwind of the BMI plant sites.
- Collect vehicle exhaust samples from the CAT and John Deere haul vehicles and a passenger truck to establish an emission profile for on-site vehicles

- Revise data tables to be more easily reviewed and interpreted; additional quality assurance review to ensure accuracy and correct statistical formulas
- Revise summary reports to indicate that wind roses are provided for informational purposes only and will not be used to make upwind/downwind determinations

4.0 REFERENCES

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- U.S. EPA 1999. “*Compendium Method IO-3.3 Determination of Metals in Ambient Particulate Matter Using X-Ray Fluorescence (XRF) Spectroscopy.*” June 1999.

APPENDIX A

NDEP COMMENTS AND BRC RESPONSE TO COMMENTS

APPENDIX B

FIELD DOCUMENTATION FORMS

APPENDIX C

LABORATORY ANALYTICAL RESULTS

APPENDIX D

**CALIBRATION AND SAMPLE VOLUME CALCULATION
WORKSHEETS**

APPENDIX E

CD CONTAINING ELECTRONIC COPY OF REPORT, TABLES, AND TRACK CHANGES VERSION OF REPORT

FIGURE 1

FIGURE 1 INSERTED HERE

TABLES 2 AND 3

**TABLE 2
SAMPLE COLLECTION SAMPLE HANDLING AND ANALYSIS SPECIFICATIONS FOR OFF SITE AIR-SAMPLING
STATIONS
BMI COMPLEX HENDERSON, NEVADA**

Analytical Parameter	Equipment Manufacturer/ Model	Sample Media	Sample Frequency/ Sample Events	Sample Handling Temperature/ hold time	Laboratory/ Analytical Method
Organochlorine Pesticides (TO-4A)	Tisch Environmental/ TE-1000	Polyurethane foam cartridge/102 mm quartz fiber filter	24hr. cont. sample/every 3 days/10 events	<4°C/7 days	Air Toxics Ltd./Method TO-4A
PCDDs/PCDFs (TO-9A)	Tisch Environmental/ TE-1000	Polyurethane foam cartridge/102 mm quartz fiber filter	24hr. cont. sample/every 3 days/10 events	<4°C/7 days	Frontier Ltd./Method TO-9A
VOCs/SVOCs (TO-13A)	Tisch Environmental/ TE-1000	Polyurethane foam cartridge/102 mm quartz fiber filter	24hr. cont. sample/every 3 days/10 events	<4°C/7 days	Air Toxics Ltd./Method TO-13A
TSP/Metals	BGI, Inc./PQ100	47mm Teflon fiber filter	24hr. cont. sample/every 3 days/10 events	None/30 days	Chester Labnet/ Method IO-2.1; Method IO-3.3
Asbestos	SKC, Inc. 224-PCXR8	25mm mixed cellulose ester filter	24hr. cont. sample/every 3 days/10 events	None/N/A	AES Laboratory/ NIOSH 7400

Notes:

< = less than
 °C = degree Celsius
 cont. = continuous
 hr = hour
 PM₁₀ = particulate matter less than 10-microns
 mm = millimeter
 N/A = not applicable
 µg/m³ = microgram per cubic meter



**TABLE 3
OFF SITE AIR SAMPLING SUMMARY DATA, BMI COMPLEX, HENDERSON,
NEVADA**

INSERT TABLE 3