



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

Northwest Regional Office • 3190 160th Avenue SE • Bellevue, Washington 98008-5452 • (425) 649-7000

October 18, 2006

CERTIFIED MAIL

7005 1820 0000 6708 1421

Mr. Jim Sumner
Manager, Group Environmental Programs
General Electric Aircraft Engine
One Neumann Way MD T165
Cincinnati, OH 45215

Dear Mr. Sumner:

Re: Ecology Response Letter: August 2006 Indoor Air Sampling –Former GE Building, Seattle, Washington, dated October 12, 2006.

Thank you for submitting the report, *August 2006 Indoor Air Sampling –Former GE Building, Seattle, Washington, dated October 12, 2006*. Ecology received this report by US Mail on October 12, 2006.

Ecology does not agree with the General Electric Company's (GE's) conclusions that the August 21, 2006 indoor air sampling data was "*potentially inconsistent*" with the previous December 2005 indoor air and sub-slab vapor sampling data collected. Furthermore, Ecology could not find any technical basis – and GE did not provide any – for assuming the August 2006 TCE indoor air data was not the result of vapor intrusion across the floor slab.¹

Based on the most recent indoor air data and previous indoor air and sub-slab vapor data, Ecology has *immediate concerns* regarding the current TCE vapor intrusion into the former GE building located at 220 South Dawson Street, Seattle, Washington. Unlike some exposure pathways that may only *potentially* affect receptors, and may only *potentially* affect receptors in the manner predicted by risk assessment calculations using reasonable worst case assumptions, the indoor air pathway is evaluated relatively directly and risks estimated for this pathway are more likely to actually be realized by the exposed receptors.

¹ None of the four (4) ambient air samples collected had trichloroethylene (TCE) concentrations above the reporting limit (0.18 ug/m³). RETEC conducted a site visit to the building the previous Friday before indoor air sampling took place the following Monday. All potential sources of volatile organic chemicals were placed in sealed plastic bags. Furthermore, tenants interviewed on the previous Friday prior to the following Monday sampling date all stated that VOC products were not going to be used that Friday, over the weekend or on the following Monday. The analytical data validation uncovered no significant problems and the indoor air data were deemed suitable for their intended use. No indoor air sources of TCE were identified in the report.



Workers and others breathing the air in the 220 South Dawson Street building will certainly be inhaling any contamination in that air resulting from vapor intrusion. Allowing this to occur can only be justified by demonstrating that the contaminant concentrations are so low as to be associated with insignificant health impacts.

Ecology generally defines significant - and unacceptable - health impacts as excess carcinogenic risks of $1E-5$ or greater. For typical full-time workers this means that TCE levels in the workplace air, due exclusively to contamination contributed by soil gas, cannot exceed $\sim 1 \text{ ug/m}^3$ (as calculated using Equation 750-2 of Chapter 173-340 WAC and assuming workers exposed at 8 hours per day and 5-days per week). Two areas in the former GE building had TCE indoor air concentrations that exceeded this threshold last August 2006: Area #1 and Area #4. Area #4 exceeded the acceptable concentration by five times. A third area (Area #5) had TCE concentrations that were essentially equal to 1 ug/m^3 . All of these areas had elevated TCE levels in soil gas when measured last December 2005. Indoor air concentrations in Areas #1 and #4, however, were much lower (an order of magnitude) at that time.²

While it is possible that a third indoor air sampling event could return results similar to the December 2005 concentrations, it is just as possible that results could be greater than those found in the August sampling, or somewhere between the two samplings. GE could, obviously, continue to sample the indoor air periodically and then determine what a likely *average*³ TCE concentration is for the building. Of course, during this time the workers would continue to be exposed and GE would need to pay for multiple air sampling events that are not only costly, but are inconvenient for both the building tenants, and the Ecology staff responsible for assuring that this sampling is conducted properly.

Once indoor air VOC concentrations have been measured that exceed risk-based action levels at buildings where there have also been measurements showing significant soil gas contamination, lower indoor air results from additional sampling are unlikely to negate Ecology's perceived need for action. When similar scenarios (unacceptable indoor air measurements) have occurred at other Washington sites, Ecology has counseled PLPs to quickly obtain estimates for alternative vapor intrusion mitigation systems. These systems can commonly be installed quickly and are capable of becoming effective almost immediately. Often they are also quite inexpensive. When it appears that these systems can be installed relatively inexpensively, and are likely to be effective, Ecology expects PLPs to either offer them to the building's owners and tenants or take immediate actions to substantially reduce the VOC concentrations in media below the building.⁴ In the absence

² even still, Areas #4 and #5 had TCE concentrations that exceeded MTCA Method C cleanup levels

³ a large number of sampling events would generally be needed to justify calculating an average value that would replace the maximum value as the *exposure point concentration*. Ecology is unwilling, in general, to agree that an average of a few measurements conservatively represents the true average concentration (which could then be compared to the action or cleanup levels). Nor is Ecology willing to wait while GE collects samples during multiple future events, if the reason for waiting is simply in order to calculate a 95% upper confidence limit on the mean (of measured indoor air TCE concentrations) that differs significantly from the maximum measured value.

⁴ At the Philip Services Corporation site 2 blocks south, once "corrected" indoor air TCE concentrations exceed 0.5 ug/m^3 the PLP routinely proposes mitigation for commercial/industrial buildings (as an interim measure).

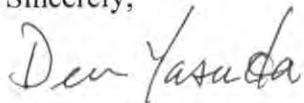
of these actions there is no assurance that air concentrations measured in the future will consistently be well below the unacceptable levels detected in the past.

Rather than repeat the August 2006 sampling later this month, therefore, GE should prepare estimates for mitigating the portions of the building where past sub-slab soil gas results were elevated (i.e., all Areas but Area #2). The estimates should be submitted within 30-calendar days, and should be accompanied by GE's identification of your preferred mitigation system design. The VI mitigation work plan that GE was finalizing (but has not submitted) should have this information, or should provide enough information to calculate these cost estimates.

After Ecology has reviewed the estimates it will either direct GE to implement a mitigation system or collect additional indoor air samples before any system is installed. Our decision regarding sub-slab mitigation versus continued, routine air sampling will be based on the cost of the proposed systems, their likely performance, and an analysis of how likely we believe: a) sub-slab soil gas concentrations will be reduced to non-threatening levels in the near future, and b) future measurements of indoor air TCE concentrations will be consistently well below 1 ug/m³ throughout the building. The decision will be consistent with our policy that mitigation is generally indicated if an effective mitigation approach is no more costly than the cost of multiple repeated samplings.

Please feel free to call me at (425) 649-7264 if you have any questions regarding this letter. Ecology is willing to discuss its comments and required work in a teleconference call, before the submittals are due to Ecology.

Sincerely,



Dean Yasuda, P.E.
Environmental Engineer
Hazardous Waste and Toxics Reduction Program

DY:cg

cc: Julie Sellick, HWTR/NWRO
Ed Jones, Ecology HWTR/NWRO
Jim Schwartz, Ecology AAG
Tong Li, Ground Water Solutions
Marcia Bailey, EPA Region 10
Stephen R. Black, Black & Yund
Alex Cordas, Keymac, LCC
Bill Joyce, Salter, Joyce, Ziker, PLLC
Greg Murphy, NOVA Consulting
WAD009278706 HZW 6.2

General Electric
WAD009278706
H2W 6.7.1



*Original signed cover letter
sent separately from
report*

GE
Aviation

RECEIVED
OCT 23 2006
DEPT. OF ECOLOGY

James W. Sumner, Manager
Group Environmental Programs

One Neumann Way, M/D T165
Cincinnati, OH 45215

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jim.sumner@ge.com

October 12, 2006

Mr. Dean Yasuda
Washington Department of Ecology
Northwest Regional Office
3190 - 160th Avenue S.E.
Bellevue, Washington 98008-5452

Dear Mr. Yasuda:

Attached please find a report prepared by RETEC regarding the August, 2006 air sampling event at the former GE building. As noted in the report, due to the unexpected and potentially inconsistent results GE plans to repeat the analysis in the next few weeks. This repeat analysis will be conducted in an identical manner to the August event. We will of course notify DOE once the logistics are finalized. GE is also still committed to conducting the February 2007 sampling event.

Should you have any questions please feel free to contact me at 513 672-3986 or Jill Lantz at (206) 624-9349.

Sincerely,

A handwritten signature in black ink that reads 'James W. Sumner'.

James W. Sumner

Attachment - Air Sampling Report

cc: Tong Li - Groundwater Solutions
Alex Cordas - KeyMac
Bill Joyce - Salter Joyce Ziker
Greg Murphy, Nova Consulting Group, Inc. (Via e-mail)
Linda Baker, Jill Lantz, Jamie Stevens - RETEC



October 12, 2006

RECEIVED

OCT 12 2006

DEPT. OF ECOLOGY

Mr. Dean Yasuda
Department of Ecology
3190 160th Ave. SE
Bellevue, WA 98008

RE: August 2006 Indoor Air Sampling – Former GE Building, Seattle, WA

Dear Dean:

General Electric Company's Aviation division (GE) is currently evaluating environmental impacts to soil and groundwater at, and downgradient of its former facility, 220 South Dawson Street in Seattle, Washington. GE and the Washington Department of Ecology (Ecology) entered into an Agreed Order (#DE02HWTRNR-4686) in 2002, under which GE will complete the investigation phase of the project so that a final remedy can be implemented. The work to be completed under the Agreed Order is detailed in the Interim Action Work Plan (IAWP; RETEC, 2002).

The first round of air sampling at the former GE building was conducted in December 2005. During that event, only trichloroethene (TCE) was detected above the MTCA Method C cleanup level of $0.22 \mu\text{g}/\text{m}^3$. A remediation level was also developed with a value of $1.15 \mu\text{g}/\text{m}^3$. No samples contained TCE greater than this value. Based on elevated concentrations in the sub-slab samples, Ecology required either mitigation or additional sampling at the site. Shortly thereafter Ecology also agreed the investigation phase was complete and requested a Completion Report and Draft Cleanup Action Plan. As such GE has elected to combine the mitigation work for the indoor air pathway with the final remedy at the site, and has therefore agreed to additional indoor air sampling in August 2006 and February 2007.

This report presents the results of the indoor and ambient air sampling performed in accordance with our August 10, 2006 letter, which references the *Work Plan for Evaluation of Subsurface Vapor Intrusion, Revision 2*, dated November 1, 2005. The scope of work included collection of air samples from indoor and outdoor sampling locations, to provide an update to results obtained in December 2005, and give information on the potential for seasonal variations in indoor air quality in the building.

Sampling Methods

On Friday August 18, 2006, Jamie Stevens (RETEC) conducted a site walk-through to observe and mitigate potential sources of volatile organic compounds (VOC) contamination in indoor air. Potential sources of VOC were identified at Puget Pipe Supply and Hudson Bay Insulation; all potential sources were placed in sealed plastic bags. Copies of field notes are included in Attachment A.



dry copy
~~XXXXXXXXXXXXXXXXXXXX~~

*General Electric
WA0009278706
420 C.F.1
August 2006 Indoor Air Sampling
Aviation Report - former GE
BUILDING*

James W. Sumner, Manager
Group Environmental Programs

One Neumann Way, M/D T165
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Mr. Dean Yasuda
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Should you have any questions please feel free to contact me at 513 672-3986 or Jill Lantz at (206) 624-9349.

Sincerely,

James W. Sumner
James W. Sumner

Attachment - Air Sampling Report

- cc: Tong Li - Groundwater Solutions
- Alex Cordas - KeyMac
- Bill Joyce - Salter Joyce Ziker
- Greg Murphy, Nova Consulting Group, Inc. (Via e-mail)
- Linda Baker, Jill Lantz, Jamie Stevens - RETEC

Field work for the air sampling was conducted on Monday, August 21, 2006. A total of 9 air samples were collected for this evaluation. These consisted of 4 ambient air samples, 4 indoor air samples, and 1 field duplicate sample. The sample locations are shown in Figure 1.

All indoor and ambient sampling was also conducted in accordance with the standard operating procedures discussed in the Work Plan. All sampling canisters were individually certified clean by GC/MS analysis before being used in the field. Certification of cleaning and evacuation was noted prior to collection of samples. A vacuum gauge was used to check both the initial and final vacuum in the canisters; the initial vacuum was checked to ensure mechanical integrity of the canisters and was approximately 30 inches mercury (inches Hg). The final vacuum after sample collection read from approximately 1 to 10 inches Hg, and was verified upon receipt by the laboratory to ensure sample integrity during return shipment (Table 1). Two different pressure gauges were used to record vacuum readings on the canisters – a glycerin-filled gauge provided by the laboratory, and the built-in gauge on each flow controller.

The sample ID, sample date, sample time and canister number were recorded on the sampling forms and in the field notes. Signs were also posted on each unit stating the purpose of the sampler and asking that no smoking occur. In addition, starting and ending vacuum readings were recorded for each canister, and recorded on the sample labels and the Chain of Custody for laboratory quality control purposes. Once samples were collected, they were stored according to the method protocol and shipped to the analytical laboratory on the next business day under Chain of Custody procedures. Copies of all field forms are included in Attachment A, a photographic record of the sampling events is provided in Attachment B.

All sampling was conducted concurrent on August 21, 2006. This event occurred after a 2-day weekend and during dry weather. The samples were collected over an eight-hour time period to capture a normal worker's exposure. This event was conducted during the normal operating hours for all of the businesses in the former GE building.

The indoor samples were set up and collected in accordance with the Work Plan. Six-liter Summa canisters with 8-hour flow controllers were used to collect each indoor air sample during the field event. The canisters and controllers were SIM-certified at the laboratory. The canisters were placed approximately four to five feet above the ground (at approximate breathing zone height).

A field duplicate sample was collected at the IA-5 location. Two canisters were set up on a file cabinet in Puget Pipe office space. A photograph of the setup is shown in Attachment B. The field duplicate was used in data validation for quality control/quality assurance purposes.

Ambient Air Results

Tetrachloroethylene (PCE) was detected in one ambient air sample – 0.27 $\mu\text{g}/\text{m}^3$ in AA-3. No other CVOC were detected above the detection limit. Results are summarized in Table 2.

The wind during the day on August 21 was generally from a S/SSE direction, based on field observations. Wind speed and direction data were obtained from Boeing Field and from the Puget Sound Clean Air Agency (PSCAA) station located at 4752 East Marginal Way South, less than one-half mile from the former GE facility. Wind roses showing the wind speed and direction recorded at the two locations throughout the day are shown in Figure 2. These measurements confirm that wind was generally from a southerly direction, with the majority of the measurements from the SSE direction. Based on the wind data for the test period, samples AA-1 and AA-3 are representative of upwind conditions at the former GE facility.

Indoor Air Results

PCE, TCE and 1,1,1-trichloroethane (TCA) were detected in indoor air samples. Because PCE was the only compound detected in ambient air, the average PCE concentration of AA-1 and AA-3 was subtracted from the indoor air concentrations, to develop “corrected” indoor air concentrations, reflecting only the indoor air contribution to PCE in the samples. The raw and “corrected” indoor air results are summarized in Table 2.

The “corrected” PCE concentrations ranged from 0.03 to 0.10 $\mu\text{g}/\text{m}^3$, well below the MTCA Method C cleanup level of 4.2 $\mu\text{g}/\text{m}^3$. Likewise, the TCA concentrations of 0.17 to 0.21 $\mu\text{g}/\text{m}^3$ were well below the MTCA Method C cleanup level of 2,205 $\mu\text{g}/\text{m}^3$.

TCE was detected in indoor air samples at concentrations ranging from 0.29 (IA-2) to 5.2 (IA-4) $\mu\text{g}/\text{m}^3$. All detections were greater than the MTCA Method C cleanup level of 0.22 $\mu\text{g}/\text{m}^3$. Two of the detections (IA-1 and IA-5, but not the field duplicate from IA-5) were only slightly above the remediation level of 1.15 $\mu\text{g}/\text{m}^3$, which takes into account actual exposure frequencies and durations for the workers in the building, rather than assuming 24-hour a day exposures. These concentrations (1.3 and 1.2 $\mu\text{g}/\text{m}^3$, respectively) were higher than the previous detections in December 2005 of 0.085 and 0.515 $\mu\text{g}/\text{m}^3$ for IA-1 and IA-5, respectively. The field duplicate at IA-5 contained TCE below the remediation level, at a concentration of 0.96 $\mu\text{g}/\text{m}^3$.

TCE was detected in IA-4 at a concentration of 5.2 $\mu\text{g}/\text{m}^3$, above both the cleanup and remediation levels of 0.22 and 1.15 $\mu\text{g}/\text{m}^3$, respectively. This sample was located in the warehouse area of the Hudson Bay Insulation company.

Summary and Next Steps

TCE was detected above the remediation level of 1.15 $\mu\text{g}/\text{m}^3$ in 3 of the 5 indoor air samples. At IA-1, the detection of 1.3 $\mu\text{g}/\text{m}^3$ is only 0.15 $\mu\text{g}/\text{m}^3$ greater than the remediation level. At IA-5, the average value from the primary and duplicate samples is 1.08 $\mu\text{g}/\text{m}^3$, slightly below the remediation level, despite the primary sample containing 1.2 $\mu\text{g}/\text{m}^3$ TCE – slightly above the remediation level. Given the extremely low detections of TCE in these two locations during the December 2005 sampling event, it is unlikely that the August results represent a sustained exceedance of the remediation level.

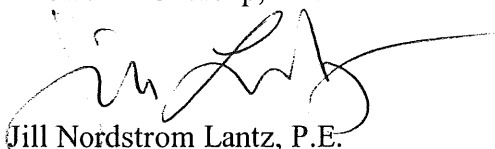
Dean Yasuda
October 12, 2006
Page 4

While a review of QA/QC data found no issues, GE believes the result at IA-4 may be suspect due to it being significantly higher than all previous results and due to the fact that there were only minor concentrations found in the sub-slab in this area. It is unclear what mechanism would cause such a result in this area, particularly in light of the fact that sub-slab vapor concentrations at this location were significantly lower than in locations under the Puget Piping portion of the building. No evidence of new cracks or disturbances to the building slab were observed during sampling. It may be indicative of some indoor source of TCE that has not been identified, or it may be an anomaly that is not indicative of ongoing site conditions. In order to assess whether this increase was a transient condition, GE is will be collecting an additional round of indoor and ambient air samples in October 2006, following the same scope and procedures as were used for the August 2006 sampling event.

Although not relevant as action levels, but relevant to personnel exposure levels, the Occupational Safety and Health Administration (OSHA) permissible exposure limit (PEL) is a time-weighted average (TWA) of 100 ppm. The National Institute for Occupational Safety and Health recommends an exposure limit of 25 ppm as a 10-hour TWA. According to the American Conference of Industrial Hygienists (ACGIH), an 8-hour TWA of 50 ppm is recommended. The most conservative of these values (25 ppm) is equivalent to 134 mg/m^3 , or $134,000 \text{ } \mu\text{g/m}^3$. This value is over 25,000 times the highest detected TCE concentration of $5.2 \text{ } \mu\text{g/m}^3$ (IA-4).

If you have any questions or comments, please call me at (206) 624-9349 or Jim Sumner at (513) 672-3986.

Sincerely,
The RETEC Group, Inc.



Jill Nordstrom Lantz, P.E.
Project Manager

cc: Jim Sumner – GE
Alex Cordas – KeyMac
Bill Joyce – Salter Joyce Ziker
Tong Li – Groundwater Solutions
Linda Baker, Jamie Stevens – RETEC
RETEC File GE001-19314

Tables

Table 1 Summary of Sample Collection Information - August 2006

Location ID	Canister ID	Initial Vacuum Readings		Final Vacuum Readings		Final Vacuum Reading at Laboratory	Start Time	End Time	Duration (hours)	Analysis
		Glycerin Gauge	Flow Controller	Glycerin Gauge	Flow Controller					
AA-1	33382	-30	-29	-5.5	-5.5	-6.0	7:08	14:58	7:50	TO-15 SIM
AA-2	25321	-30	-30	-5.0	-5.0	-6.0	7:17	15:07	7:50	TO-15 SIM
AA-3	4223	-30	-29.5	-6.0	-5.0	-5.5	7:26	15:19	7:53	TO-15 SIM
AA-4	02242	-30	-30	-6.0	-5.0	-6.0	7:33	14:27	6:54	TO-15 SIM
IA-1	33325	-28	-30	-5.5	-5.0	-5.0	6:59	14:46	7:47	TO-15 SIM
IA-3	32122	-28	-25.5	-5.0	-4.5	-3.5	6:54	14:32	7:38	TO-15 SIM
IA-4	34325	-28	-30	-6.5	-5.0	-5.0	6:42	14:40	7:58	TO-15 SIM
IA-5	11006	-26	-30	-6.0	-5.0	-5.0	7:01	14:47	7:46	TO-15 SIM
IA-5 (Dup)	03960	-30	-30	-6.0	-5.0	-5.0	7:02	14:47	7:45	TO-15 SIM

Notes:

TO-15 Analysis included: 1,1,1-Trichloroethane (1,1,1-TCA), 1,1-Dichloroethane (1,1-DCA), 1,1-Dichloroethylene (1,1-DCE), Chloroform, cis 1,2-Dichloroethylene (1,2-DCE), Tetrachloroethylene (PCE), Trichloroethylene (TCE), and Vinyl Chloride

All vacuum readings in units of pounds per square inch (psi)

Initial Vacuum Readings of -30psi were greater than -30psi, the gauge only recorded to -30psi.

Table 2 August 2006 Vapor Intrusion Study Results - Former GE Facility

Chemical Name			1,1,1-TCA	1,1-DCA	1,1-DCE	Chloroform	cis-1,2-DCE	PCE	TCE	Vinyl Chloride
Location ID	Sample Date	Sample ID								
Indoor Air Samples (ug/m³)										
IA-1	8/21/2006	IA-1-0806	0.21	< 0.13	< 0.064	< 0.16	< 0.13	0.22	1.3	< 0.041
IA-2	8/21/2006	IA-3-0806	0.17	< 0.12	< 0.06	0.16	< 0.12	0.29	0.29	< 0.039
IA-4	8/21/2006	IA-4-0806	0.21	< 0.13	< 0.064	0.16	< 0.13	0.22	5.2	< 0.041
IA-5	8/21/2006	IA-5-0806	0.21	< 0.13	< 0.064	< 0.16	< 0.13	0.22	1.2	< 0.041
IA-5	8/21/2006	Duplicate-0806	0.18	< 0.13	< 0.064	< 0.16	< 0.13	0.22	0.96	< 0.041
Upwind Ambient Samples (ug/m³)										
AA-1	8/21/2006	AA-1-0806	< 0.18	< 0.14	< 0.067	< 0.16	< 0.13	< 0.23	< 0.18	< 0.043
AA-3	8/21/2006	AA-3-0806	< 0.18	< 0.13	< 0.065	< 0.16	< 0.13	0.27	< 0.18	< 0.042
<i>Average Upwind for Indoor Air Correction</i>			<i>0</i>	<i>0</i>	<i>0</i>	<i>0</i>	<i>0</i>	0.19 *	<i>0</i>	<i>0</i>
Down/Crosswind Ambient Samples (ug/m³)										
AA-2	8/21/2006	AA-2-0806	< 0.18	< 0.14	< 0.067	< 0.16	< 0.13	< 0.23	< 0.18	< 0.043
AA-4	8/21/2006	AA-4-0806	< 0.18	< 0.14	< 0.067	< 0.16	< 0.13	< 0.23	< 0.18	< 0.043
Corrected Indoor Air Results (Indoor Air minus Ambient) (ug/m³)										
IA-1	8/21/2006	IA-1-0806	0.21	< 0.13	< 0.064	< 0.16	< 0.13	0.03	1.3	< 0.041
IA-2	8/21/2006	IA-3-0806	0.17	< 0.12	< 0.06	0.16	< 0.12	0.10	0.29	< 0.039
IA-4	8/21/2006	IA-4-0806	0.21	< 0.13	< 0.064	0.16	< 0.13	0.03	5.2	< 0.041
IA-5	8/21/2006	IA-5-0806	0.21	< 0.13	< 0.064	< 0.16	< 0.13	0.03	1.2	< 0.041
IA-5 (dup)	8/21/2006	Duplicate-0806	0.18	< 0.13	< 0.064	< 0.16	< 0.13	0.03	0.96	< 0.041
<i>Indoor Air Screening Level</i>			<i>2,205</i>	<i>350</i>	<i>200</i>	<i>1.1</i>	<i>35</i>	<i>4.20</i>	<i>0.22</i>	<i>2.82</i>

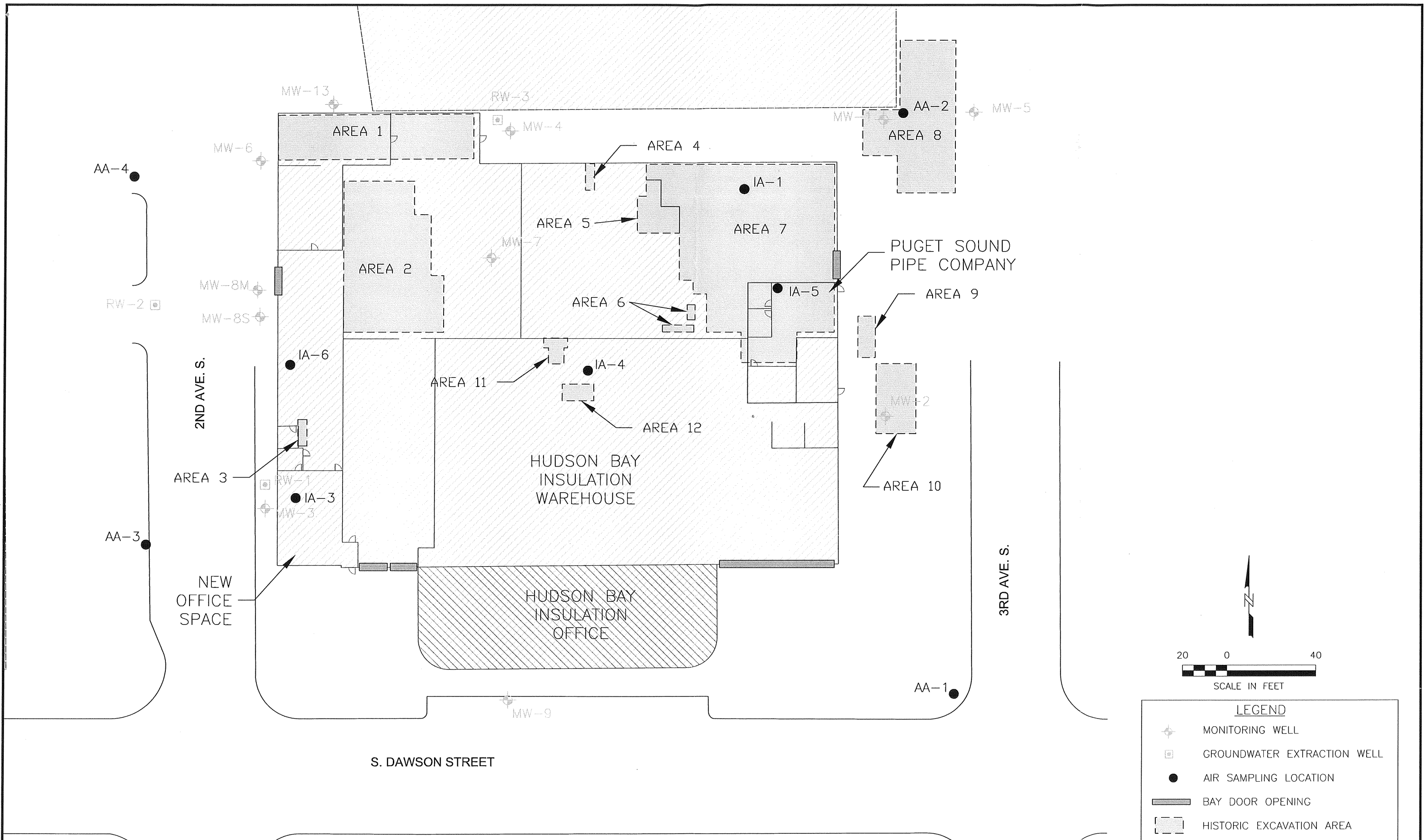
Notes: All samples analyzed by Method TO-15 SIM

Shading indicates an exceedance of air/vapor screening levels.

* Average PCE concentration in ambient air calculated using 1/2 detection limit for non-detect.

Figures

File: H:\19314\19314S046.dwg Layout: FIGURE 1 User: emarshall Plotted: Oct 09, 2006 - 2:44pm Xref's:



NOTE:

- INTERNAL WAREHOUSE WALLS ARE FROM McKINSTRY Co. BUILDINGS, DRAFTED 5/17/2004, AND FEILD UPDATED 8/09/2005.
- LOCATIONS ARE APPROXIMATE.



GEAE - S. DAWSON STREET GE001-19314-750		SAMPLING LOCATIONS
DATE: 10/9/06	DRWN: E.M./SEA	FIGURE 1

Attachment A

September 18, 2006

Organic Data Verification Report

General Electric – South Dawson Street

Air Sampling - August 2006

Prepared for:

**Jill Nordstrom Lantz
Project Manager
The RETEC Group, Inc.
1011 Klickitat Way, Suite 207
Seattle, WA 98134**

Prepared by:

**Ann Biegelsen
Environmental Quality Assurance Chemist
The RETEC Group, Inc.
2409 Research Blvd., Suite 106
Fort Collins, CO 80526**

RETEC Project No.: GE001-19314-750

Overview

The samples analyzed for the General Electric South Dawson Street air sampling event from August 2006 are listed in the Table of Samples Analyzed (page 2). Data verification was performed on nine air samples.

Samples were analyzed by Air Toxics Ltd of Folsom, CA. The verified analyses were Volatile Organic Compounds (VOCs) by modified GC/MS method TO15 SIM.

The RETEC Analytical Data Verification Checklist is presented as pages 3-6. Data were evaluated based on validation criteria set forth in the *USEPA Contract Laboratory Program (CLP) National Functional Guidelines for Superfund Organic Methods Data Review*, document number EPA540/R-99/008, October 1999 with additional reference to document 540-R-04-009, January 2005 as they applied to the reported methodology. Field duplicate RPD control limits were taken from the USEPA Region I Laboratory Data Validation Functional Guidelines for Evaluating Organics Analyses, February 1988, upheld in DRAFT 1993.

The following data components were reviewed during the data verification procedure:

Submitted Deliverables
Case Narratives
Chain-of-Custody form(s) and sample integrity
Sample results, reporting detection limits, method detection limits, dilution factors
Holding times
Method blank results
LCS (blank spike) results
Laboratory duplicate results
Organic surrogate recoveries
Blind field duplicate results
Electronic data deliverables (EDDs)

Data Validation Qualifiers Assigned During this Review

There were no data validation qualifiers assigned during this review.

Overall Data Assessment

Precision, accuracy, method compliance, and completeness of the data set have been determined to be acceptable, based on the data submitted. The data are suitable for their intended use.

Table of Samples Analyzed
General Electric South Dawson Street
Air Samples
Air Toxics Ltd. Laboratory Project 0608577
August 2006 Sampling

Matrix	Sample Name	Parent Sample ID	Sample Date and Time	Lab SDG	Lab Sample ID
Air	AA-1-0806	IA-5-0806	8/21/2006 7:08	0608577	0608577-01A
Air	AA-2-0806		8/21/2006 7:17	0608577	0608577-02A
Air	AA-3-0806		8/21/2006 7:26	0608577	0608577-03A
Air	AA-4-0806		8/21/2006 7:33	0608577	0608577-04A
Air	Duplicate-0806		8/21/2006 7:02	0608577	0608577-08A
Air	IA-1-0806		8/21/2006 6:59	0608577	0608577-05A
Air	IA-3-0806		8/21/2006 6:54	0608577	0608577-07A
Air	IA-4-0806		8/21/2006 6:42	0608577	0608577-09A
Air	IA-5-0806		8/21/2006 7:01	0608577	0608577-06A

RETEC ANALYTICAL DATA VERIFICATION CHECKLIST

Project Name: General Electric	Laboratory: Air Toxics Ltd. Folsom, CA					
Project Reference: South Dawson Street Air Sampling	Sample Matrix: Air					
RETEC Project: GE001-19314-750	Sample Start Date: 08/21/2006					
Verified By/Date Verified: Ann Biegelsen / 09/14/2006	Sample End Date: 08/21/2006					
Samples Analyzed: Refer to the Table of Samples Analyzed (page 2).						
Parameters Verified: Volatile Organic Compounds (VOCs) by modified GC/MS method TO15 SIM.						
Laboratory Project ID: 0608577						
PRECISION, ACCURACY, METHOD COMPLIANCE, AND COMPLETENESS ASSESSMENT						
Precision:	X	Acceptable		Unacceptable	AB	Initials
<p>Comments: Precision is the measure of variability of individual sample measurements. Field precision was determined by comparison of field duplicate sample results. Laboratory precision could not be determined as there were no laboratory duplicate samples reported in this data set. Evaluation of field duplicates for precision was done using the Relative Percent Difference (RPD). The RPD is defined as the difference between two duplicate samples divided by the mean and expressed as a percent. Field duplicate RPD QC limits were set at 0-30% for air samples. No data require qualification based on field duplicate precision measurements, and overall field precision is acceptable. Precision measurements are reviewed in items 17, 20, and 21.</p>						
Accuracy:	X	Acceptable		Unacceptable	AB	Initials
<p>Comments: Field accuracy, a measure of the sampling bias, could not be determined as there were no trip blank, field blank, or equipment rinse blank samples included in this data set. Laboratory accuracy is a measure of the system bias, and was measured by evaluating laboratory control sample/laboratory control sample duplicate (LCS), and organic system monitoring compounds (surrogate) percent recoveries (%Rs). LCS %Rs, which demonstrated the overall performance of the analysis, were compared to EPA published QC limits. System monitoring compound or surrogate recoveries, which measured system performance and efficiency during organic analysis, were compared to EPA published QC limits or laboratory control charted limits. No data require qualification based on laboratory accuracy measurements, and overall laboratory accuracy is acceptable. Accuracy measurements are reviewed in items 12, 14, 15 and 16.</p>						
Method Compliance:	X	Acceptable		Unacceptable	AB	Initials
<p>Comments: Method compliance was determined by evaluating sample integrity, holding time, and laboratory blanks against method specified requirements, while applying EPA data validation guidelines. No data require qualification based on method compliance measurements, and overall method compliance is acceptable based on the supplied data. Method compliance measurements are reviewed in items 4, 6, 8, 11, 13, 18, 19, 20 and 22.</p>						
Completeness:	X	Acceptable		Unacceptable	AB	Initials
<p>Comments: Completeness is the overall ratio of the number of samples planned versus the number of samples with verified analyses. Completeness goals are set at 90-100%. Determination of completeness included a review of chain of custody records, laboratory analytical methods and detection limits, laboratory case narratives, and project requirements. Completeness also included 100% review of the laboratory sample data results, QC summary reports, and electronic data deliverables (EDDs). All of the data received from the laboratory are useable without qualification. Completeness of the data is 100% and is acceptable.</p>						

RETEC ANALYTICAL DATA VERIFICATION CHECKLIST

VERIFICATION CRITERIA CHECK						
There were no data verification flags used in this review.						
1. Did the laboratory identify any non-conformances related to the analytical results?	X	Yes		No	AB	Initials
<p>Explanation by laboratory:</p> <p>Sample Receipt: The COC information for sample Duplicate-0806 did not match the entry on the sample tag with regard to sample identification. The discrepancy was noted in the Sample Receipt Confirmation email/fax and the information on the COC was used to process and report the sample.</p> <p>Sample collection date was incomplete on the COC for samples AA-2-0806, AA-3-0806, AA-4-0806, IA-1-0806, IA-5-0806, IA-3-0806, Duplicate-0806 and IA-4-0806. The sample date was taken from the tag and the discrepancy was noted in the Sample Receipt Confirmation email/fax.</p> <p><u>Method TO-15:</u> Modifications to method TO-15 were noted.</p> <p>Data qualification, if any, related to the laboratory observations are discussed in the following sections.</p>						
2. Were sample Chain-of-Custody forms complete?	X	Yes		No	AB	Initials
Comments: COC records from field to laboratory were complete, and custody was maintained as evidenced by field and laboratory personnel signatures, dates, and times of receipt.						
3. Were all the analyses requested for the samples on the COCs completed by the laboratory?	X	Yes		No	AB	Initials
Comments: All requested analyses were completed.						
4. Were samples received in good condition and at the appropriate temperature?	X	Yes		No	AB	Initials
Comments: No discrepancies or problems were identified on the chains of custody or in the case narrative.						
5. Were the requested analytical methods in compliance with WP/QAPP, permit, or COC?	X	Yes		No	AB	Initials
Comments: Reported methods and target analyte lists were in compliance with COC records with the following notation. The COC requests method TO-14 analyses. The laboratory performed method TO-15. As these methods are equivalent except that TO-15 provides lower reporting limits, no action is required other than noting this discrepancy.						
6. Were detection limits in accordance with WP/QAPP, permit, or method?	X	Yes		No	AB	Initials
Comments: Reported detection limits are achievable by the quoted methods.						
7. Do the laboratory reports include only those constituents requested to be reported for a specific analytical method?	X	Yes		No	AB	Initials
Comments: Only the requested target analytes were reported.						
8. Were sample holding times met?	X	Yes		No	AB	Initials
Comments: Extraction and analytical holding times were met for all samples and analyses.						
9. Were correct concentration units reported?	X	Yes		No	AB	Initials
Comments: All results are reported in units of $\mu\text{g}/\text{m}^3$.						

RETEC ANALYTICAL DATA VERIFICATION CHECKLIST

10. Were the reporting requirements for flagged data met?	X	Yes		No	AB	Initials
Comments: Data verification qualifiers override any assigned laboratory flags.						
11. Were laboratory blank samples free of target analyte contamination?	X	Yes		No	AB	Initials
Comments: All laboratory blanks were free of target analyte contamination.						
12. Were trip blank, field blank, and/or equipment rinse blank samples free of target analyte contamination?	NA	Yes	NA	No	AB	Initials
Comments: There were no trip blank, field blank or equipment rinse blank samples included in this data set. Field accuracy could not be evaluated for this data set.						
13. Were instrument calibrations within method or data validation control limits?	NA	Yes	NA	No	AB	Initials
<i>Comments: Not applicable for this level of data verification – Instrument calibration data were not supplied in analytical laboratory reports and were therefore not included in this data review.</i>						
14. Were surrogate recoveries within control limits?	X	Yes		No	AB	Initials
Comments: Surrogate percent recoveries (%Rs) for organic analyses were within data verification QC criteria for all samples.						
15. Were laboratory control sample recoveries within control limits?	X	Yes		No	AB	Initials
Comments: LCS (blank spike) recoveries were within data verification or laboratory control-charted QC limits for all target analytes.						
16. Were matrix spike recoveries within control limits?	NA	Yes	NA	No	AB	Initials
<i>Comments: Not applicable for the reported method - The analysis of MS and MSD samples is not required for TO-15 analysis.</i>						
17. Were duplicate RPDs and/or serial dilution %Ds within control limits?	NA	Yes	NA	No	AB	Initials
Comments: There were no laboratory duplicate samples reported in this data set. Laboratory precision could not be determined. <i>Serial Dilution %D data is not applicable for the reported method – There were no metals analytes requested for the samples in this data set.</i>						
18. Were organic system performance criteria met?	NA	Yes	NA	No	AB	Initials
<i>Comments: Not applicable for this level of data verification – Organic system performance data was not supplied in analytical laboratory reports and was therefore not included in this data review.</i>						
19. Were internal standards within method criteria for GC/MS sample analyses?	NA	Yes	NA	No	AB	Initials
<i>Comments: Not applicable for this level of data verification – GC/MS internal standard data was not supplied in analytical laboratory reports and was therefore not included in this data review.</i>						

RETEC ANALYTICAL DATA VERIFICATION CHECKLIST

20. Were inorganic system performance criteria met?	NA	Yes	NA	No	AB	Initials																																				
<i>Comments: Not applicable for the reported method – There were no inorganic parameters requested for the samples in this data set.</i>																																										
21. Were blind field duplicates collected? If so, discuss the precision (RPD) of the results.	X	Yes		No	AB	Initials																																				
Duplicate Sample No.	Duplicate-0806			Primary Sample No.	IA-5-0806																																					
<p>Comments: The RPDs for the duplicates were within the 0-30% data verification QC limits for air samples, or RPDs were not applicable due to results that were \pm the detection limit or were undetected in both samples, as indicated in the table below. Field duplicate and native sample concentrations that were both undetected are not reflected in the table below since RPDs are not applicable.</p> <p>The following RPDs were calculated:</p> <table border="1" style="width: 100%; border-collapse: collapse; margin: 5px 0;"> <thead> <tr> <th>Method</th> <th>Analyte</th> <th>IA-5-0806</th> <th>Duplicate-0806</th> <th>RPD</th> <th>Qualifier</th> <th>Samp RL</th> <th>Dup RL</th> <th>Units</th> </tr> </thead> <tbody> <tr> <td>TO-15 SIM</td> <td>1,1,1-Trichloroethane</td> <td style="text-align: center;">0.21</td> <td style="text-align: center;">0.18</td> <td style="text-align: center;">15.38</td> <td></td> <td style="text-align: center;">0.18</td> <td style="text-align: center;">0.18</td> <td style="text-align: center;">ug/m3</td> </tr> <tr> <td>TO-15 SIM</td> <td>Tetrachloroethene</td> <td style="text-align: center;">0.22</td> <td style="text-align: center;">0.22</td> <td style="text-align: center;">0.00</td> <td></td> <td style="text-align: center;">0.22</td> <td style="text-align: center;">0.22</td> <td style="text-align: center;">ug/m3</td> </tr> <tr> <td>TO-15 SIM</td> <td>Trichloroethene</td> <td style="text-align: center;">1.2</td> <td style="text-align: center;">0.96</td> <td style="text-align: center;">22.22</td> <td></td> <td style="text-align: center;">0.17</td> <td style="text-align: center;">0.17</td> <td style="text-align: center;">ug/m3</td> </tr> </tbody> </table> <p>No data require qualification based on the field duplicate RPDs.</p>							Method	Analyte	IA-5-0806	Duplicate-0806	RPD	Qualifier	Samp RL	Dup RL	Units	TO-15 SIM	1,1,1-Trichloroethane	0.21	0.18	15.38		0.18	0.18	ug/m3	TO-15 SIM	Tetrachloroethene	0.22	0.22	0.00		0.22	0.22	ug/m3	TO-15 SIM	Trichloroethene	1.2	0.96	22.22		0.17	0.17	ug/m3
Method	Analyte	IA-5-0806	Duplicate-0806	RPD	Qualifier	Samp RL	Dup RL	Units																																		
TO-15 SIM	1,1,1-Trichloroethane	0.21	0.18	15.38		0.18	0.18	ug/m3																																		
TO-15 SIM	Tetrachloroethene	0.22	0.22	0.00		0.22	0.22	ug/m3																																		
TO-15 SIM	Trichloroethene	1.2	0.96	22.22		0.17	0.17	ug/m3																																		
22. Were qualitative criteria for organic target analyte identification met?	NA	Yes	NA	No	AB	Initials																																				
<i>Comments: Not applicable for this level of data verification –GC/MS quantitation reports and chromatograms were not supplied in analytical laboratory reports and were therefore not included in this data review.</i>																																										
23. Were 100% of the EDD concentrations and reporting limits compared to the hardcopy data reports?	X	Yes		No	AB	Initials																																				
Comments: There were no discrepancies between the EDD concentrations and reporting limits and the hardcopy data reports.																																										
<p>24. General Comments: Data were evaluated based on validation criteria set forth in the <i>USEPA Contract Laboratory Program (CLP) National Functional Guidelines for Superfund Organic Methods Data Review</i>, document number EPA540/R-99/008, October 1999 with additional reference to document 540-R-04-009, January 2005, as they applied to the reported methodology. Field duplicate RPD control limits were taken from the USEPA Region I Laboratory Data Validation Functional Guidelines for Evaluating Organics Analyses, February 1988, upheld in DRAFT 1993</p>																																										

Sample Transportation Notice

Relinquishing signature on this document indicates that sample is being shipped in compliance with all applicable local, State, Federal, national, and international laws, regulations and ordinances of any kind. Air Toxics Limited assumes no liability with respect to the collection, handling or shipping of these samples. Relinquishing signature also indicates agreement to hold harmless, defend, and indemnify Air Toxics Limited against any claim, demand, or action, of any kind, related to the collection, handling, or shipping of samples. D.O.T. Hotline (800) 467-1922.

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FOLSOM, CA 95630-4719
(916) 985-1000 FAX (916) 985-1020

Page 1 of 1

CHAIN-OF-CUSTODY RECORD

Contact Person Jill Lantz
Company The RETEL Group Email jlantz@retel.com
Address 1011 SW Klondike Way City Seattle State WA Zip _____
Phone 206-624-9349 Fax _____
Collected by: (Signature) J. Stevens

Project Info:	Turn Around Time:	Lab. Use Only:
P.O. # _____	<input checked="" type="checkbox"/> Normal	Pressurized by: <u>VPP</u>
Project # <u>GE001-19314-750</u>	<input type="checkbox"/> Rush	Date: <u>8/22/06</u>
Project Name <u>GE - Dawson St.</u>	specify _____	Pressurization Gas: <u>He</u>

Lab I.D.	Field Sample I.D. (Location)	Can#	Date	Start Time	Analyses Requested	Canister Pressure/Vacuum			
						Initial	Final	Receipt	Final (psi)
01A	AA-1-0806	33982	8/21/06	7:08	TO-14 SIM	-30+	5.5	6.0 ^{From sample canister gauge}	5.00 si
02A	AA-2-0806	25821	8/21	7:17		-30+	5.0	6.0 ^{From sample canister gauge}	
03A	AA-3-0806	4223	8/21	7:26		-30+	6.0	5.0 ^{From sample canister gauge}	
04A	AA-4-0806	02242	8/21	7:33		-30+	6.0	6.0 ^{From sample canister gauge}	
05A	IA-1-0806	33325	8/21	6:59		-28	5.5	5.0 ^{From sample canister gauge}	
06A	IA-5-0806	11606	8/21	7:01		-26	6.0	5.0 ^{From sample canister gauge}	
07A	IA-3-0806	38122	8/21	6:54		-28	5.0	3.5 ^{From sample canister gauge}	
08A	Duplicate-0806	03960	8/21	7:02		-30	6.0	5.0 ^{From sample canister gauge}	
09A	IA-4-0806	34325	8/21	6:42		-28	6.5	5.0 ^{From sample canister gauge}	

Relinquished by: (signature) <u>J. Stevens</u> Date/Time <u>8/21 16:10</u>	Received by: (signature) <u>Christian Handley</u> Date/Time <u>8/22/06 9:10 AM</u>	Notes: _____
Relinquished by: (signature) _____ Date/Time _____	Received by: (signature) _____ Date/Time _____	
Relinquished by: (signature) _____ Date/Time _____	Received by: (signature) _____ Date/Time _____	

Lab Use Only	Shipper Name <u>Fed Ex</u>	Air Bill # <u>791530210000</u>	Temp (°C) <u>N/A</u>	Condition <u>good</u>	Customer: Seals Intact? <u>Yes No (None)</u>	Work Order # <u>0608577</u>
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Air Toxics Ltd. Introduces the Electronic Report

Thank you for choosing Air Toxics Ltd. To better serve our customers, we are providing your report by e-mail. This document is provided in Portable Document Format which can be viewed with Acrobat Reader by Adobe.

This electronic report includes the following:

- Work order Summary;
- Laboratory Narrative;
- Results; and
- Chain of Custody (copy).

180 BLUE RAVINE ROAD, SUITE B FOLSOM, CA - 95630

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Hours 8:00 A.M to 6:00 P.M. Pacific**



AIR TOXICS LTD.

AN ENVIRONMENTAL ANALYTICAL LABORATORY

WORK ORDER #: 0608577

Work Order Summary

CLIENT: Ms. Jill Lantz
 The RETEC Group, Inc.
 1011 SW Klickitat Way
 Suite 207
 Seattle, WA 98134

BILL TO: Ms. Jill Lantz
 The RETEC Group, Inc.
 1011 SW Klickitat Way
 Suite 207
 Seattle, WA 98134

PHONE:

P.O. #

FAX:

PROJECT # GE001-19314-750 GE-Dawson St.

DATE RECEIVED: 08/22/2006

CONTACT: Nicole Danbacher

DATE COMPLETED: 09/05/2006

<u>FRACTION #</u>	<u>NAME</u>	<u>TEST</u>	<u>RECEIPT VAC./PRES.</u>
01A	AA-1-0806	Modified TO-15 SIM	6.0 "Hg
02A	AA-2-0806	Modified TO-15 SIM	6.0 "Hg
03A	AA-3-0806	Modified TO-15 SIM	5.5 "Hg
04A	AA-4-0806	Modified TO-15 SIM	6.0 "Hg
05A	IA-1-0806	Modified TO-15 SIM	5.0 "Hg
06A	IA-5-0806	Modified TO-15 SIM	5.0 "Hg
07A	IA-3-0806	Modified TO-15 SIM	3.5 "Hg
08A	Duplicate-0806	Modified TO-15 SIM	5.0 "Hg
09A	IA-4-0806	Modified TO-15 SIM	5.0 "Hg
10A	Lab Blank	Modified TO-15 SIM	NA
11A	CCV	Modified TO-15 SIM	NA
12A	LCS	Modified TO-15 SIM	NA

CERTIFIED BY:

Laboratory Director

DATE: 09/05/06

Certification numbers: CA NELAP - 02110CA, LA NELAP/LELAP- AI 30763, NJ NELAP - CA004
 NY NELAP - 11291, UT NELAP - 9166389892

Name of Accrediting Agency: NELAP/Florida Department of Health, Scope of Application: Clean Air Act,

Accreditation number: E87680, Effective date: 07/01/06, Expiration date: 06/30/07

Air Toxics Ltd. certifies that the test results contained in this report meet all requirements of the NELAC standards

This report shall not be reproduced, except in full, without the written approval of Air Toxics Ltd.

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**LABORATORY NARRATIVE
 Modified TO-15 SIM
 The RETEC Group, Inc.
 Workorder# 0608577**

Nine 6 Liter Summa Canister (SIM Certified) samples were received on August 22, 2006. The laboratory performed analysis via modified EPA Method TO-15 using GC/MS in the SIM acquisition mode. The method involves concentrating up to 0.5 liters of air. The concentrated aliquot is then flash vaporized and swept through a water management system to remove water vapor. Following dehumidification, the sample passes directly into the GC/MS for analysis.

Method modifications taken to run these samples are summarized in the below table. Specific project requirements may over-ride the ATL modifications.

<i>Requirement</i>	<i>TO-15</i>	<i>ATL Modifications</i>
ICAL %RSD acceptance criteria	$\leq 30\%$ RSD with 2 compounds allowed out to <math>< 40\%</math> RSD	Project specific; default criteria is $\leq 30\%$ RSD with 10% of compounds allowed out to <math>< 40\%</math> RSD
Daily Calibration	+/- 30% Difference	Project specific; default criteria is $\leq 30\%$ Difference with 10% of compounds allowed out up to $\leq 40\%$; flag and narrate outliers
Blank and standards	Zero air	Nitrogen
Method Detection Limit	Follow 40CFR Pt.136 App. B	The MDL met all relevant requirements in Method TO-15 (statistical MDL less than the LOQ). The concentration of the spiked replicate may have exceeded 10X the calculated MDL in some cases

Receiving Notes

The Chain of Custody (COC) information for sample Duplicate-0806 did not match the entry on the sample tag with regard to sample identification. The discrepancy was noted in the Sample Receipt Confirmation email/fax and the information on the COC was used to process and report the sample.

Sample collection date was incomplete on the chain of custody for samples AA-2-0806, AA-3-0806, AA-4-0806, IA-1-0806, IA-5-0806, IA-3-0806, Duplicate-0806 and IA-4-0806. The sampling date was taken from the tag and the discrepancy was noted in the Sample Receipt Confirmation email/fax.

Analytical Notes

There were no analytical discrepancies.

Definition of Data Qualifying Flags

Eight qualifiers may have been used on the data analysis sheets and indicates as follows:



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B - Compound present in laboratory blank greater than reporting limit (background subtraction not performed).

J - Estimated value.

E - Exceeds instrument calibration range.

S - Saturated peak.

Q - Exceeds quality control limits.

U - Compound analyzed for but not detected above the reporting limit.

UJ- Non-detected compound associated with low bias in the CCV

N - The identification is based on presumptive evidence.

File extensions may have been used on the data analysis sheets and indicates as follows:

a-File was requantified

b-File was quantified by a second column and detector

r1-File was requantified for the purpose of reissue



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Summary of Detected Compounds MODIFIED EPA METHOD TO-15 GC/MS SIM

Client Sample ID: AA-1-0806

Lab ID#: 0608577-01A

No Detections Were Found.

Client Sample ID: AA-2-0806

Lab ID#: 0608577-02A

No Detections Were Found.

Client Sample ID: AA-3-0806

Lab ID#: 0608577-03A

Compound	Rpt. Limit (ppbv)	Amount (ppbv)	Rpt. Limit (uG/m3)	Amount (uG/m3)
Tetrachloroethene	0.033	0.039	0.22	0.27

Client Sample ID: AA-4-0806

Lab ID#: 0608577-04A

No Detections Were Found.

Client Sample ID: IA-1-0806

Lab ID#: 0608577-05A

Compound	Rpt. Limit (ppbv)	Amount (ppbv)	Rpt. Limit (uG/m3)	Amount (uG/m3)
Trichloroethene	0.032	0.25	0.17	1.3
1,1,1-Trichloroethane	0.032	0.038	0.18	0.21
Tetrachloroethene	0.032	0.032	0.22	0.22

Client Sample ID: IA-5-0806

Lab ID#: 0608577-06A

Compound	Rpt. Limit (ppbv)	Amount (ppbv)	Rpt. Limit (uG/m3)	Amount (uG/m3)
Trichloroethene	0.032	0.22	0.17	1.2
1,1,1-Trichloroethane	0.032	0.038	0.18	0.21
Tetrachloroethene	0.032	0.032	0.22	0.22

Client Sample ID: IA-3-0806

Lab ID#: 0608577-07A



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Summary of Detected Compounds MODIFIED EPA METHOD TO-15 GC/MS SIM

Client Sample ID: IA-3-0806

Lab ID#: 0608577-07A

Compound	Rpt. Limit (ppbv)	Amount (ppbv)	Rpt. Limit (uG/m3)	Amount (uG/m3)
Trichloroethene	0.030	0.054	0.16	0.29
Chloroform	0.030	0.034	0.15	0.16
1,1,1-Trichloroethane	0.030	0.031	0.16	0.17
Tetrachloroethene	0.030	0.043	0.21	0.29

Client Sample ID: Duplicate-0806

Lab ID#: 0608577-08A

Compound	Rpt. Limit (ppbv)	Amount (ppbv)	Rpt. Limit (uG/m3)	Amount (uG/m3)
Trichloroethene	0.032	0.18	0.17	0.96
1,1,1-Trichloroethane	0.032	0.034	0.18	0.18
Tetrachloroethene	0.032	0.032	0.22	0.22

Client Sample ID: IA-4-0806

Lab ID#: 0608577-09A

Compound	Rpt. Limit (ppbv)	Amount (ppbv)	Rpt. Limit (uG/m3)	Amount (uG/m3)
Trichloroethene	0.032	0.98	0.17	5.2
Chloroform	0.032	0.033	0.16	0.16
1,1,1-Trichloroethane	0.032	0.038	0.18	0.21
Tetrachloroethene	0.032	0.032	0.22	0.22



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Client Sample ID: AA-1-0806

Lab ID#: 0608577-01A

MODIFIED EPA METHOD TO-15 GC/MS SIM

File Name:	6082911	Date of Collection:	8/21/06
Dil. Factor:	1.68	Date of Analysis:	8/29/06 07:04 PM

Compound	Rot. Limit (ppbv)	Amount (ppbv)	Rpt. Limit (uG/m3)	Amount (uG/m3)
Vinyl Chloride	0.017	Not Detected	0.043	Not Detected
cis-1,2-Dichloroethene	0.034	Not Detected	0.13	Not Detected
Trichloroethene	0.034	Not Detected	0.18	Not Detected
1,1-Dichloroethene	0.017	Not Detected	0.067	Not Detected
Chloroform	0.034	Not Detected	0.16	Not Detected
1,1,1-Trichloroethane	0.034	Not Detected	0.18	Not Detected
Tetrachloroethene	0.034	Not Detected	0.23	Not Detected
1,1-Dichloroethane	0.034	Not Detected	0.14	Not Detected

Container Type: 6 Liter Summa Canister (SIM Certified)

Surrogates	%Recovery	Method Limits
1,2-Dichloroethane-d4	114	70-130
Toluene-d8	97	70-130
4-Bromofluorobenzene	101	70-130



AIR TOXICS LTD.

AN ENVIRONMENTAL ANALYTICAL LABORATORY

Client Sample ID: AA-2-0806

Lab ID#: 0608577-02A

MODIFIED EPA METHOD TO-15 GC/MS SIM

File Name:	6082912	Date of Collection:	8/21/06
Dil. Factor:	1.68	Date of Analysis:	8/29/06 08:18 PM

Compound	Rpt. Limit (ppbv)	Amount (ppbv)	Rpt. Limit (uG/m3)	Amount (uG/m3)
Vinyl Chloride	0.017	Not Detected	0.043	Not Detected
cis-1,2-Dichloroethene	0.034	Not Detected	0.13	Not Detected
Trichloroethene	0.034	Not Detected	0.18	Not Detected
1,1-Dichloroethene	0.017	Not Detected	0.067	Not Detected
Chloroform	0.034	Not Detected	0.16	Not Detected
1,1,1-Trichloroethane	0.034	Not Detected	0.18	Not Detected
Tetrachloroethene	0.034	Not Detected	0.23	Not Detected
1,1-Dichloroethane	0.034	Not Detected	0.14	Not Detected

Container Type: 6 Liter Summa Canister (SIM Certified)

Surrogates	%Recovery	Method Limits
1,2-Dichloroethane-d4	116	70-130
Toluene-d8	100	70-130
4-Bromofluorobenzene	108	70-130



AIR TOXICS LTD.

AN ENVIRONMENTAL ANALYTICAL LABORATORY

Client Sample ID: AA-3-0806

Lab ID#: 0608577-03A

MODIFIED EPA METHOD TO-15 GC/MS SIM

File Name:	6082916	Date of Collection:	8/21/06
Dil. Factor:	1.64	Date of Analysis:	8/30/06 02:20 AM

Compound	Rot. Limit (ppbv)	Amount (ppbv)	Rpt. Limit (uG/m3)	Amount (uG/m3)
Vinyl Chloride	0.016	Not Detected	0.042	Not Detected
cis-1,2-Dichloroethene	0.033	Not Detected	0.13	Not Detected
Trichloroethene	0.033	Not Detected	0.18	Not Detected
1,1-Dichloroethene	0.016	Not Detected	0.065	Not Detected
Chloroform	0.033	Not Detected	0.16	Not Detected
1,1,1-Trichloroethane	0.033	Not Detected	0.18	Not Detected
Tetrachloroethene	0.033	0.039	0.22	0.27
1,1-Dichloroethane	0.033	Not Detected	0.13	Not Detected

Container Type: 6 Liter Summa Canister (SIM Certified)

Surrogates	%Recovery	Method Limits
1,2-Dichloroethane-d4	116	70-130
Toluene-d8	98	70-130
4-Bromofluorobenzene	106	70-130

Client Sample ID: AA-4-0806

Lab ID#: 0608577-04A

MODIFIED EPA METHOD TO-15 GC/MS SIM

File Name:	6082917	Date of Collection:	8/21/06
Dil. Factor:	1.68	Date of Analysis:	8/30/06 02:58 AM

Compound	Rpt. Limit (ppbv)	Amount (ppbv)	Rpt. Limit (uG/m3)	Amount (uG/m3)
Vinyl Chloride	0.017	Not Detected	0.043	Not Detected
cis-1,2-Dichloroethene	0.034	Not Detected	0.13	Not Detected
Trichloroethene	0.034	Not Detected	0.18	Not Detected
1,1-Dichloroethene	0.017	Not Detected	0.067	Not Detected
Chloroform	0.034	Not Detected	0.16	Not Detected
1,1,1-Trichloroethane	0.034	Not Detected	0.18	Not Detected
Tetrachloroethene	0.034	Not Detected	0.23	Not Detected
1,1-Dichloroethane	0.034	Not Detected	0.14	Not Detected

Container Type: 6 Liter Summa Canister (SIM Certified)

Surrogates	%Recovery	Method Limits
1,2-Dichloroethane-d4	112	70-130
Toluene-d8	99	70-130
4-Bromofluorobenzene	109	70-130



AIR TOXICS LTD.

AN ENVIRONMENTAL ANALYTICAL LABORATORY

Client Sample ID: IA-1-0806

Lab ID#: 0608577-05A

MODIFIED EPA METHOD TO-15 GC/MS SIM

File Name:	6082918	Date of Collection:	8/21/06
Dil. Factor:	1.61	Date of Analysis:	8/30/06 03:36 AM

Compound	Rot. Limit (ppbv)	Amount (ppbv)	Rpt. Limit (uG/m3)	Amount (uG/m3)
Vinyl Chloride	0.016	Not Detected	0.041	Not Detected
cis-1,2-Dichloroethene	0.032	Not Detected	0.13	Not Detected
Trichloroethene	0.032	0.25	0.17	1.3
1,1-Dichloroethene	0.016	Not Detected	0.064	Not Detected
Chloroform	0.032	Not Detected	0.16	Not Detected
1,1,1-Trichloroethane	0.032	0.038	0.18	0.21
Tetrachloroethene	0.032	0.032	0.22	0.22
1,1-Dichloroethane	0.032	Not Detected	0.13	Not Detected

Container Type: 6 Liter Summa Canister (SIM Certified)

Surrogates	%Recovery	Method Limits
1,2-Dichloroethane-d4	114	70-130
Toluene-d8	99	70-130
4-Bromofluorobenzene	109	70-130



AIR TOXICS LTD.

AN ENVIRONMENTAL ANALYTICAL LABORATORY

Client Sample ID: IA-5-0806

Lab ID#: 0608577-06A

MODIFIED EPA METHOD TO-15 GC/MS SIM

File Name:	6082919	Date of Collection:	8/21/06
Dil. Factor:	1.61	Date of Analysis:	8/30/06 04:22 AM

Compound	Rpt. Limit (ppbv)	Amount (ppbv)	Rpt. Limit (uG/m3)	Amount (uG/m3)
Vinyl Chloride	0.016	Not Detected	0.041	Not Detected
cis-1,2-Dichloroethene	0.032	Not Detected	0.13	Not Detected
Trichloroethene	0.032	0.22	0.17	1.2
1,1-Dichloroethene	0.016	Not Detected	0.064	Not Detected
Chloroform	0.032	Not Detected	0.16	Not Detected
1,1,1-Trichloroethane	0.032	0.038	0.18	0.21
Tetrachloroethene	0.032	0.032	0.22	0.22
1,1-Dichloroethane	0.032	Not Detected	0.13	Not Detected

Container Type: 6 Liter Summa Canister (SIM Certified)

Surrogates	%Recovery	Method Limits
1,2-Dichloroethane-d4	115	70-130
Toluene-d8	98	70-130
4-Bromofluorobenzene	101	70-130

Client Sample ID: IA-3-0806

Lab ID#: 0608577-07A

MODIFIED EPA METHOD TO-15 GC/MS SIM

File Name:	6082920	Date of Collection:	8/21/06
Dil. Factor:	1.52	Date of Analysis:	8/30/06 05:03 AM

Compound	Rpt. Limit (ppbv)	Amount (ppbv)	Rpt. Limit (uG/m3)	Amount (uG/m3)
Vinyl Chloride	0.015	Not Detected	0.039	Not Detected
cis-1,2-Dichloroethene	0.030	Not Detected	0.12	Not Detected
Trichloroethene	0.030	0.054	0.16	0.29
1,1-Dichloroethene	0.015	Not Detected	0.060	Not Detected
Chloroform	0.030	0.034	0.15	0.16
1,1,1-Trichloroethane	0.030	0.031	0.16	0.17
Tetrachloroethene	0.030	0.043	0.21	0.29
1,1-Dichloroethane	0.030	Not Detected	0.12	Not Detected

Container Type: 6 Liter Summa Canister (SIM Certified)

Surrogates	%Recovery	Method Limits
1,2-Dichloroethane-d4	112	70-130
Toluene-d8	97	70-130
4-Bromofluorobenzene	106	70-130



AIR TOXICS LTD.

AN ENVIRONMENTAL ANALYTICAL LABORATORY

Client Sample ID: Duplicate-0806

Lab ID#: 0608577-08A

MODIFIED EPA METHOD TO-15 GC/MS SIM

File Name:	6082921	Date of Collection:	8/21/06
Dil. Factor:	1.61	Date of Analysis:	8/30/06 06:07 AM

Compound	Rpt. Limit (ppbv)	Amount (ppbv)	Rpt. Limit (uG/m3)	Amount (uG/m3)
Vinyl Chloride	0.016	Not Detected	0.041	Not Detected
cis-1,2-Dichloroethene	0.032	Not Detected	0.13	Not Detected
Trichloroethene	0.032	0.18	0.17	0.96
1,1-Dichloroethene	0.016	Not Detected	0.064	Not Detected
Chloroform	0.032	Not Detected	0.16	Not Detected
1,1,1-Trichloroethane	0.032	0.034	0.18	0.18
Tetrachloroethene	0.032	0.032	0.22	0.22
1,1-Dichloroethane	0.032	Not Detected	0.13	Not Detected

Container Type: 6 Liter Summa Canister (SIM Certified)

Surrogates	%Recovery	Method Limits
1,2-Dichloroethane-d4	116	70-130
Toluene-d8	105	70-130
4-Bromofluorobenzene	114	70-130



AIR TOXICS LTD.

AN ENVIRONMENTAL ANALYTICAL LABORATORY

Client Sample ID: IA-4-0806

Lab ID#: 0608577-09A

MODIFIED EPA METHOD TO-15 GC/MS SIM

File Name:	6082922	Date of Collection:	8/21/06
Dil. Factor:	1.61	Date of Analysis:	8/30/06 06:45 AM

Compound	Rpt. Limit (ppbv)	Amount (ppbv)	Rpt. Limit (uG/m3)	Amount (uG/m3)
Vinyl Chloride	0.016	Not Detected	0.041	Not Detected
cis-1,2-Dichloroethene	0.032	Not Detected	0.13	Not Detected
Trichloroethene	0.032	0.98	0.17	5.2
1,1-Dichloroethene	0.016	Not Detected	0.064	Not Detected
Chloroform	0.032	0.033	0.16	0.16
1,1,1-Trichloroethane	0.032	0.038	0.18	0.21
Tetrachloroethene	0.032	0.032	0.22	0.22
1,1-Dichloroethane	0.032	Not Detected	0.13	Not Detected

Container Type: 6 Liter Summa Canister (SIM Certified)

Surrogates	%Recovery	Method Limits
1,2-Dichloroethane-d4	115	70-130
Toluene-d8	98	70-130
4-Bromofluorobenzene	104	70-130



AIR TOXICS LTD.

AN ENVIRONMENTAL ANALYTICAL LABORATORY

Client Sample ID: Lab Blank

Lab ID#: 0608577-10A

MODIFIED EPA METHOD TO-15 GC/MS SIM

File Name:	6082905	Date of Collection:	NA
Dil. Factor:	1.00	Date of Analysis:	8/29/06 12:23 PM

Compound	Rpt. Limit (ppbv)	Amount (ppbv)	Rpt. Limit (uG/m3)	Amount (uG/m3)
Vinyl Chloride	0.010	Not Detected	0.026	Not Detected
cis-1,2-Dichloroethene	0.020	Not Detected	0.079	Not Detected
Trichloroethene	0.020	Not Detected	0.11	Not Detected
1,1-Dichloroethene	0.010	Not Detected	0.040	Not Detected
Chloroform	0.020	Not Detected	0.098	Not Detected
1,1,1-Trichloroethane	0.020	Not Detected	0.11	Not Detected
Tetrachloroethene	0.020	Not Detected	0.14	Not Detected
1,1-Dichloroethane	0.020	Not Detected	0.081	Not Detected

Container Type: NA - Not Applicable

Surrogates	%Recovery	Method Limits
1,2-Dichloroethane-d4	107	70-130
Toluene-d8	99	70-130
4-Bromofluorobenzene	100	70-130



AIR TOXICS LTD.

AN ENVIRONMENTAL ANALYTICAL LABORATORY

Client Sample ID: CCV

Lab ID#: 0608577-11A

MODIFIED EPA METHOD TO-15 GC/MS SIM

File Name:	6082902	Date of Collection:	NA
Dil. Factor:	1.00	Date of Analysis:	8/29/06 10:14 AM

Compound	%Recovery
Vinyl Chloride	114
cis-1,2-Dichloroethene	99
Trichloroethene	91
1,1-Dichloroethene	105
Chloroform	99
1,1,1-Trichloroethane	101
Tetrachloroethene	92
1,1-Dichloroethane	98

Container Type: NA - Not Applicable

Surrogates	%Recovery	Method Limits
1,2-Dichloroethane-d4	108	70-130
Toluene-d8	96	70-130
4-Bromofluorobenzene	111	70-130



AIR TOXICS LTD.

AN ENVIRONMENTAL ANALYTICAL LABORATORY

Client Sample ID: LCS

Lab ID#: 0608577-12A

MODIFIED EPA METHOD TO-15 GC/MS SIM

File Name:	6082903	Date of Collection: NA
Dil. Factor:	1.00	Date of Analysis: 8/29/06 10:56 AM

Compound	%Recovery
Vinyl Chloride	75
cis-1,2-Dichloroethene	94
Trichloroethene	89
1,1-Dichloroethene	90
Chloroform	93
1,1,1-Trichloroethane	98
Tetrachloroethene	92
1,1-Dichloroethane	93

Container Type: NA - Not Applicable

Surrogates	%Recovery	Method Limits
1,2-Dichloroethane-d4	105	70-130
Toluene-d8	98	70-130
4-Bromofluorobenzene	101	70-130

FIELD ACTIVITY LOG

PROJECT GEAE
 PROJECT NO. G6001-19314-750
 DAY & DATE Friday 8/18/06

COMPLETED BY J. Stevens
 REVIEWED BY _____
 SHEET 1 OF 4

TIME	SUMMARY OF DAILY ACTIVITIES AND EVENTS
11:00	JS leaves office
11:10	Arrive M site
11:15	-check w/ Randy at Hudson Supply. Out at lunch will be back at 11:30
11:20	checked with Mansons supply -ok to sample 7-4pm hours no work over weekend
	did not find any TCE/VOC products
11:45	Check in with Puget pipe supply 6-4pm no work over weekend -found the same cans of paint as last time plus 1 gallon can of paint - put all these in a ziplock bag. No other items found in the warehouse. -Only item in the office
12:03	Hudson- Randy not in, inspect warehouse -will call Randy when back in office Findings: -Fire resistive coating Eco-Perm Coating 11-02 Black Met
	bagged ← - paint thinner - cans of paint
	did not bag because these were all sealed and far away from sampling point. took photos
	bagged bagged - came 363 high strength fast tack spray - high heat adhesive
12:30	JS leaves site
12:40	Return to office
13:15	called Randy w/ Hudson Bay -16:30-3 no work over weekend found some WD-40 and adhesive (unsure if this had any chlorinated solvents) - bagged these up

by J. Stevens

GEAE - Site Visit

Pre August 21 2006 Indoor and Ambient Air Sampling Event

Purpose: Check the sample locations for VOC products, confirm that the spaces will be closed for the weekend, inform the tenants of the wish to reduce fan use, opening windows, or using VOC products on Monday, and to remind them of the event.

Questions for Tenets: Mansons Supply 1A-3
Talked with: 11:20 8/18/06

Confirm operating hours for Monday

7:00 AM - 4:00pm

Will Monday - August 21 - be a normal operating day - i.e. will work activity be typical

Yes

Are you using any VOC products over the today, the weekend, or on Monday?

NO.

Will you be closed on the weekend?

Yes.

Can I walk around and look for any VOC products - such as spray paint, solvents, glues - and if I find any can I place in a zip lock bag to be removed on Monday after the sampling event?

Yes - none found. Took photo of sample location

8/18/08 page 3 of 4
by J. Stevens

GEAE - Site Visit

Pre August 21 2006 Indoor and Ambient Air Sampling Event

Purpose: Check the sample locations for VOC products, confirm that the spaces will be closed for the weekend, inform the tenants of the wish to reduce fan use, opening windows, or using VOC products on Monday, and to remind them of the event.

Questions for Tenets:
Talked with:

Puget pipe 11:45 IA-1 & IA-5

Confirm operating hours for Monday

6 - 4pm

*vacant desk now in use. propose using filing cabinet in the center of the office space.

Will Monday - August 21 - be a normal operating day - i.e. will work activity be typical

YES.

Are you using any VOC products over the today, the weekend, or on Monday?

No products

Will you be closed on the weekend?

you.

Can I walk around and look for any VOC products - such as spray paint, solvents, glues - and if I find any can I place in a zip lock bag to be removed on Monday after the sampling event?

warehouse: yes - 4 spray paint cans - only 1 capped
1 gallon can paint - placed in a bag to be conservative

office space -
1 can of glass cleaner with out cap - put away in kitchen cupboard

by J. Stevens

GEAE – Site Visit

Pre August 21 2006 Indoor and Ambient Air Sampling Event

Purpose: Check the sample locations for VOC products, confirm that the spaces will be closed for the weekend, inform the tenants of the wish to reduce fan use, opening windows, or using VOC products on Monday, and to remind them of the event.

Questions for Tenets:

Talked with:

Hudson Insulation

13:15 (called Randy)

IA-4

Confirm operating hours for Monday

6:30-3pm

Will Monday – August 21 – be a normal operating day – i.e. will work activity be typical

Yes.

Are you using any VOC products over the today, the weekend, or on Monday?

No. closed over weekend. Light use today. Some cars will be driving inside the warehouse on Monday - this is normal during business

Will you be closed on the weekend?

Yes.

Can I walk around and look for any VOC products – such as spray paint, solvents, glues – and if I find any can I place in a zip lock bag to be removed on Monday after the sampling event?

Yes - found paint cans - sealed
WD-40 - no cap placed in bag
5 gal. plastic jug of adhesive - place in a black plastic bag

FIELD ACTIVITY LOG

PROJECT GEAE
 PROJECT NO. 96001-19314
 DAY & DATE Monday 8/21/06

COMPLETED BY J. Stevens
 REVIEWED BY _____
 SHEET 1 OF _____

TIME	SUMMARY OF DAILY ACTIVITIES AND EVENTS
0600	JS at office - load equipment
0620	JS and J. Lantz leave for site
0630	On site
0635	Set up at Hudson bay parking lot.
	Start on indoor samples
	- see page 2 for times and pressures
0705	start on ambient samples
0740	JS and Jill Lantz leave site
1145	JS leave office for site
1200	JS on site
1208	AA-4 -13.0 ok.
1210	AA-3 -13.0 ok.
1225	AA-2 -11.0 ok.
1217	AA-1 -11.0 ok.
1212	IA-3 -9.0 ok photo
1215	IA-4 -11.5 ok photo
1219	IA-5 IA-1 -11.0 ok photo
1221	IA-5 -11.5 ok photo
1221	IA-5 duplicate -11.5 (11.5) ok photo
1228	No fans or open windows at any of the indoor or sample locations. Mansons supply and Puget Pipe office doors are closed. All warehouse bay doors are open. The bay door to the North of Puget pipe supply (N of ramp) remained closed.
1358	JS and JL leave office for site
1416	Check IA-3 -5.5
	IA-4 -7
	IA-5 and duplicate -7
	IA-1 -6
	AA-2 -7
	AA-1 -6
	AA-3 -7.5
	AA-4 -8
1525	Return ladders to Hertz
1549	Return to office
1615	Pack samples and ship fed. ex overnight

Attachment B

August 2006 – Air Sampling Photo Log



Ambient Air Location AA-1, facing north/northeast



Ambient Air Location AA-2, facing north

August 2006 – Air Sampling Photo Log



Ambient Air Location AA-3, facing south-west



Ambient Air Location AA-4, facing south

August 2006 – Air Sampling Photo Log



Indoor Air Location IA-1, facing north/northeast, inside Puget Pipe warehouse



Indoor Location Air IA-3, facing north, inside Masons Supply showroom/office

August 2006 – Air Sampling Photo Log



Indoor Air Location IA-4 Sampling, facing north, inside Hudson Bay Insulation warehouse



Indoor Air Location IA-5 and duplicate sample, facing south, inside Puget Pipe office