June 30, 2005

4400050035 01

Mr. Scott Smale
Brownfields/State Response
Bureau of Corrective Actions
Nevada Division of Environmental Protection
333 W. Nye Lane, Room 138
Carson City, Nevada 89706

Drum Characterization and Removal Activities
Nevada Northern Railway Museum
Brownfields Project
11th Street and Avenue A
Ely, Nevada

Dear Mr. Smale:

This report presents the summary of the drum characterization and removal activities performed by MACTEC Engineering and Consulting, Inc. (MACTEC) for the Nevada Division of Environmental Protection (NDEP) Bureau of Corrective Actions, Brownfields Program. The Subject Property is a former operating rail yard constructed in the early 1900’s to serve the local copper mining operations and was active until mining operations ceased in the early 1980’s. The property currently belongs to the White Pine Historical Railroad Foundation (dba Nevada Northern Railway Museum), and is used for tourist excursions and the restoration and preservation of the Nevada Northern Railway historic facilities, yards, and rail collection. The facility is comprised of the depot, roundhouse, coal chute, yards and a complex of carpentry, fabrication, maintenance, and storage shops.

The purpose of MACTEC’s work was to provide NDEP with services at the Museum to address existing drums located throughout the site that needed to have their contents characterized for recycling or disposal, as appropriate. On November 8, 2004, a brief tour of the railway museum facilities was conducted by NDEP and MACTEC representatives. During the tour, approximately 30 drums were noted throughout the site.

SCOPE OF WORK

Our scope of work under this contract included the following:

- Document Preparation
- Field activities to perform evaluation of the drums
- Drum Content Analysis
• Drum Removal, Transport, and Disposal

• Preparing this report.

SUMMARY OF ACTIVITIES

Field Activities

Prior to conducting field activities, a Health and Safety Plan was prepared and the Standard Operating Procedure (SOP) for drum sampling (SOP #2009, dated 11/16/1994, Revision # 0) developed by the USEPA Environmental Response Team (ERT) was submitted to the NDEP for review.

On May 10 through 12, 2005, MACTEC with assistance from Nevada Crime Cleaners (NCC), performed field activities consisting of drum/container inspection, inventory, staging, sampling, and categorization using the SOP procedures. The inventory did not include 13 observed empty drums and the over 100 one-pint to one-gallon cans of paint, lacquers, and thinner stored in the carpentry, maintenance, and storage shops. A list of drum/containers identified as a result of the field activities is presented in as Attachment 1.

If the drum/containers lacked labels or other identifying marks which indicated their contents, they were further evaluated using one or more of the following devices:

• Photoionization device (PID)

• Flame ionization device (FID)

• Lower explosive limit/oxygen (LEL/O2) meter

• Radiation detection meters

• Chemical classification kits (Spiffyter® and/or HazCat®)

As presented in Attachment 1, a total of 127 drum/containers were identified as a result of the drum inventory activities. The attachment summarizes container markings (if present) and contents, percent full, whether it was determined to be corrosive, if it is shippable in its current state, and its location. Containers ranged in size from 5 to 300 gallons with the majority of the container contents being grease or oil. Several of the containers were determined to be empty.

On the basis of the drum categorization activities, it was determined that two drums (numbers 94 and 113) required sampling and laboratory analysis for further characterization to evaluate offsite disposal options. In addition, at the request of the Museum, samples were also collected of piping installation and from a container of water softener to determine if these items had hazardous properties.
Drum Contents, Piping Installation and Water Softener Container Analysis

On the basis of markings on Drums 94 and 113, both samples from these containers were analyzed for the seven toxic hazardous waste metals using the Toxicity Characteristic Leaching Procedure (TCLP), EPA Test Methods 1311/6010B, as well as for mercury using EPA Test Method 7470. In addition, due to its labeling as alkaline, Drum 113 was analyzed for corrosivity and general mineral characteristics as follows:

- Magnesium by EPA Test Method 6010 B
- pH by 150.1
- Alkalinity as CaCO3 by SM 2320 Modified
- Chloride by EPA Test Method 300.0 Modified

The contents of the water softener container was analyzed for the same constituents as Drum 113 while the piping installation was analyzed for general mineral characteristics and asbestos (using polarized light microscopy).

With the exception of the asbestos analysis, sample analysis was performed by Del Mar Analytical, located in Phoenix, Arizona. The laboratory is certified by the Environmental Laboratory Accreditation Program (ELAP) under certificate number 2446, the State of Nevada Department of Health under certificate number AZ-907, and by the National Environmental Accreditation Program (NELAP) under accreditation number 01109CA. The asbestos analysis was performed by Fiberquant Analytical Services (under subcontract to Del Mar) located in Phoenix, Arizona.

The laboratory analytical report is attached as Attachment 2. Results of the analysis indicated the following:

- Drum 94 was non-detect for all metals and was characterized as an inorganic non-hazardous material.
- Drum 113 had a high pH and high corrosivity and was characterized as an inorganic basic and corrosive hazardous waste.
- The contents of the water softener container had a moderate pH and high corrosivity and was characterized as an inorganic basic and corrosive hazardous waste.
- The piping installation did not have any asbestos detected, but had high levels of magnesium (however, magnesium is not a hazardous toxic metal) and was characterized as a non-hazardous solid.
Drum/Container Removal, Transport, and Disposal

On the basis of the drum/container inspection inventory, sampling and categorization, budget availability, and conversations with Museum staff on prioritization of items to be removed, the following drums/containers were selected for offsite disposal/recycling:

- Drum IDs 1-26 – 55-gallon drums of grease
- Drum IDs 27-87 – 5-gallon containers of grease
- Drum IDs 89, 97, 114, 116, and 118 through 124 – 55-gallon drums containing waste oil
- Drum IDs 96, 112, and 117 – 55-gallon drums containing antifreeze
- Drum IDs 103 and 104 – 55-gallon drums containing crushed oil filters
- Drum IDs 107 – 111, 115, and 120 – 55-gallon drums containing flammable liquids
- Drum ID 105 – 55-gallon drum containing dry paint
- Drum ID 106 – 55-gallon drum containing miscellaneous solids
- Drum ID 113 – 55-gallon drum containing alkaline cleaning solution.

On June 24, 2005, MACTEC with assistance from NCC, coordinated the removal and offsite disposal of the above referenced drums/containers from the site. In addition, 13 empty drums were also removed from the site. The drums/containers were loaded onto trucks provided by Envirosolve LLC and transported as hazardous or non-hazardous waste under manifest to one of two disposal facilities as detailed on the attached manifests (Attachment 3). The drums and containers of grease, the waste oil drums, the empty drums, the waste antifreeze drums, and the drums containing the crushed oil filters were shipped as non-hazardous waste to Envirosolve’s disposal facility in Tulsa, Oklahoma. The remaining materials (flammable liquids, dried paint, miscellaneous solids, and alkaline cleaning solution) were manifested as hazardous waste and transported to Ash Grove Cement Company disposal facility in Chanute, Kansas.

CONCLUSIONS

A total of 127 drum/containers were identified as a result of the drum inventory activities. The containers ranged in size from 5 to 300 gallons with the majority of the container contents being grease or oil. Several of the containers were determined to be empty.

On the basis of the drum categorization activities it was determined that two drums required further characterization to evaluate offsite disposal options. In addition, at the request of the Museum, samples were also collected of piping installation and from a container of water softener to determine if these
items possessed hazardous properties. Results of the analysis indicated that Drum 94 can be characterized as an inorganic non-hazardous material, that Drum 113 and the contents of the water softener could be characterized as an inorganic basic and corrosive waste. The piping installation had no asbestos detected but had high levels of magnesium (a non-hazardous metal) and is characterized as a non-hazardous solid.

A total of 113 drums/containers containing waste and 13 empty drums were properly transported and disposed of under manifest to two offsite disposal facilities. Fourteen containers containing waste remain at the facility. In addition, over 100 one-pint to one-gallon cans of paint, lacquers, and thinner remain stored in the carpentry, maintenance, and storage shops. The museum has also requested disposal of these materials.

MACTEC appreciates the opportunity to provide environmental consulting services for NDEP, Bureau of Corrective Actions. If you should have any questions, please call either of the undersigned at (707) 793-3800.

Sincerely,

MACTEC Engineering and Consulting, Inc

[Signature]
Gary A. Lieberman
Senior Geologist

[Signature]
Ron Leiken, CEM
Principal Environmental Scientist
Certified Environmental Manager, Number 1798
Expiration Date: 3/8/06

In accordance with Nevada Administrative Code 459.97285,

I hereby certify that I am responsible for the services described in this document and for the preparation of this document. The services described in this document have been provided in a manner consistent with the current standards of the profession and to the best of my knowledge comply with all applicable federal, state, and local statutes, regulations, and ordinances.

GAL:RL:kib/KB61159.DOC-Henderson

Attachments:
1 – Drum Inventory Sheet
2 – Laboratory Analytical Reports
3 – Signed Manifests
<table>
<thead>
<tr>
<th>Drum ID</th>
<th>Drum Markings</th>
<th>Drum Size</th>
<th>Percent Full</th>
<th>Color of Contents</th>
<th>Contents</th>
<th>Corrosive</th>
<th>Shippable</th>
<th>Location</th>
<th>Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td>-</td>
<td>Texaco Grease</td>
<td>55 gal</td>
<td>100%</td>
<td>Brown</td>
<td>Grease</td>
<td>No</td>
<td>Yes</td>
<td>RIP Bldg</td>
<td>Product reusable</td>
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<tr>
<td>27</td>
<td>Texaco Grease</td>
<td>5 gal</td>
<td>100%</td>
<td>Brown</td>
<td>Grease</td>
<td>No</td>
<td>Yes</td>
<td>RIP Bldg</td>
<td>Reusable, Contains</td>
</tr>
<tr>
<td>87</td>
<td>Center Grease</td>
<td>35 lb</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>Not labeled</td>
<td>1,1,1-Trichloroethane</td>
</tr>
<tr>
<td>88</td>
<td>None</td>
<td>55 gal</td>
<td>100%</td>
<td>Brown/deep</td>
<td>Kerosene</td>
<td>No</td>
<td>Yes</td>
<td>RIP Bldg</td>
<td>Thick</td>
</tr>
<tr>
<td>89</td>
<td>None</td>
<td>55 gal</td>
<td>50%</td>
<td>Brown</td>
<td>Waste Oil</td>
<td>No</td>
<td>Yes</td>
<td>RIP Bldg</td>
<td></td>
</tr>
<tr>
<td>90</td>
<td>Ameco Cylinder</td>
<td>55 gal</td>
<td>75%</td>
<td>Brown</td>
<td>Oil</td>
<td>No</td>
<td>Yes</td>
<td>RIP Bldg</td>
<td></td>
</tr>
<tr>
<td>91</td>
<td>Union Steam</td>
<td>55 gal</td>
<td>100%</td>
<td>Brown</td>
<td>Oil/lube</td>
<td>No</td>
<td>Yes</td>
<td>RIP Bldg</td>
<td></td>
</tr>
<tr>
<td>92</td>
<td>Leg Grn Tank</td>
<td>~300 gal</td>
<td>0%</td>
<td>n/a</td>
<td>n/a</td>
<td>No</td>
<td>Yes</td>
<td>RIP Bldg</td>
<td>Near small rail car</td>
</tr>
<tr>
<td>93</td>
<td>Leg Grn Tank</td>
<td>~300 gal</td>
<td>0%</td>
<td>n/a</td>
<td>n/a</td>
<td>No</td>
<td>Yes</td>
<td>RIP Bldg</td>
<td>Near small rail car</td>
</tr>
<tr>
<td>94</td>
<td>Wtr Treatment</td>
<td>55 gal</td>
<td>60%</td>
<td>Brown</td>
<td>Tar-like</td>
<td>No</td>
<td>No-overpack</td>
<td>Tower</td>
<td>container</td>
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<tr>
<td>95</td>
<td>Lube Oil</td>
<td>55 gal</td>
<td>100%</td>
<td>Yellow</td>
<td>Oil</td>
<td>No</td>
<td>Yes</td>
<td>Engrs/Drafters</td>
<td>Re-usable</td>
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<tr>
<td>96</td>
<td>Antifreeze</td>
<td>55 gal</td>
<td>25%</td>
<td>Lt. Yellow</td>
<td>Antifreeze</td>
<td>No</td>
<td>Yes</td>
<td>Engrs/Drafters Bldg</td>
<td></td>
</tr>
<tr>
<td>97</td>
<td>Waste Oil</td>
<td>55 gal</td>
<td>50%</td>
<td>Brown</td>
<td>Oil</td>
<td>No</td>
<td>Yes</td>
<td>Engrs/Drafters Bldg</td>
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<tr>
<td>98</td>
<td>None</td>
<td>55 gal</td>
<td>20%</td>
<td>Rst calc</td>
<td>Oil &amp; water</td>
<td>No</td>
<td>Yes</td>
<td>Engrs/Drafters Bldg</td>
<td></td>
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<tr>
<td>99</td>
<td>Engine Oil</td>
<td>~300 gal</td>
<td>100%</td>
<td>unk</td>
<td>unk</td>
<td>No</td>
<td>Yes, No</td>
<td>East Yard</td>
<td></td>
</tr>
<tr>
<td>100</td>
<td>Waste Oil &amp;</td>
<td>~300 gal</td>
<td>100%</td>
<td>unk</td>
<td>unk</td>
<td>No</td>
<td>No</td>
<td>East Yard</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Water Tank</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>101</td>
<td>Empty Tank</td>
<td>~300 gal</td>
<td>0%</td>
<td>n/a</td>
<td>n/a</td>
<td>n/a</td>
<td>n/a</td>
<td>East Yard</td>
<td></td>
</tr>
<tr>
<td>Drum ID</td>
<td>Drum Markings</td>
<td>Drum Size</td>
<td>Percent Full</td>
<td>Color of Contents</td>
<td>Contents</td>
<td>Corrosive</td>
<td>Shippable</td>
<td>Location</td>
<td>Comments</td>
</tr>
<tr>
<td>---------</td>
<td>---------------</td>
<td>-----------</td>
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<td>------------------------</td>
<td>----------</td>
</tr>
<tr>
<td>12.1</td>
<td>None</td>
<td>55 gal</td>
<td>35%</td>
<td>Brown</td>
<td>Waste Oil</td>
<td>No</td>
<td>Yes</td>
<td>Maint Bldg Boneyard</td>
<td></td>
</tr>
<tr>
<td>12.2</td>
<td>Not-Applicable</td>
<td>55 gal</td>
<td>50%</td>
<td>Brown</td>
<td>Waste Oil</td>
<td>No</td>
<td>Yes</td>
<td>Maint Bldg Boneyard</td>
<td></td>
</tr>
<tr>
<td>12.3</td>
<td>None</td>
<td>55 gal</td>
<td>2%</td>
<td>Brown</td>
<td>Waste Oil</td>
<td>No</td>
<td>Yes</td>
<td>Maint Bldg Boneyard</td>
<td></td>
</tr>
<tr>
<td>12.4</td>
<td>Not-Applicable</td>
<td>55 gal</td>
<td>20%</td>
<td>Brown</td>
<td>Waste Oil</td>
<td>No</td>
<td>Yes</td>
<td>Maint Bldg Boneyard</td>
<td></td>
</tr>
<tr>
<td>12.5</td>
<td>None</td>
<td>55 gal</td>
<td>5%</td>
<td>Clear</td>
<td>Water</td>
<td>No</td>
<td>Yes</td>
<td>Maint Bldg Boneyard</td>
<td></td>
</tr>
<tr>
<td>12.6</td>
<td>None</td>
<td>55 gal</td>
<td>50%</td>
<td>Brown</td>
<td>Grease Oil</td>
<td>No</td>
<td>No-needs</td>
<td>Maint Bldg Boneyard</td>
<td></td>
</tr>
</tbody>
</table>

12.7 Ex-Hec Super 55 gal 50% Dark Gray Oil No Yes RIP Bldg

Comments: drum ring
# MACTEC
## Sample Collection Log

**Project Name:** Ely Railroad Drum Characterization  
**Project Location:** Ely, NV  
**Recorder Name:** Justin Thompson

<table>
<thead>
<tr>
<th>Work Area</th>
<th>Sample Location</th>
<th>Sample ID</th>
<th>Date</th>
<th>Time</th>
<th>% Visible Bullet/Shot Coverage</th>
<th>Bullets in sample (Y/N)</th>
<th>Depth</th>
<th>Soil Type</th>
<th>Container Used</th>
<th>Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td>RIP Bldg</td>
<td>Drum String</td>
<td>DRUM 88</td>
<td>5-10-05</td>
<td>1115</td>
<td>n/a</td>
<td>n/a</td>
<td></td>
<td></td>
<td>DRUM 500</td>
<td></td>
</tr>
<tr>
<td>RIP Bldg</td>
<td>DRUM 89</td>
<td>1130</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Tower</td>
<td>DRUM 94</td>
<td>1240</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>ENGR Bldg</td>
<td>DRUM 95</td>
<td>1300</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>ENGR Bldg</td>
<td>DRUM 97</td>
<td>1305</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Outside</td>
<td>Drum String</td>
<td>DRUM 102</td>
<td></td>
<td>1315</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>SW Corner of RIP</td>
<td></td>
</tr>
<tr>
<td>MAINT</td>
<td>Boneyard</td>
<td>DRUM 113</td>
<td>5-10-05</td>
<td>1400</td>
<td>n/a</td>
<td>n/a</td>
<td></td>
<td>Loose</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Metal Working</td>
<td>INSUL</td>
<td></td>
<td>1420</td>
<td>n/a</td>
<td>Loose</td>
<td>n/a</td>
<td>500 Gallon</td>
<td></td>
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</tr>
<tr>
<td>Metal Working</td>
<td>SOFTNER</td>
<td></td>
<td>1430</td>
<td>n/a</td>
<td>n/a</td>
<td>Loose</td>
<td>n/a</td>
<td>500 Gallon</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

---

Sample Collection Log .xls  
4/29/2005
ATTACHMENT 2

LABORATORY ANALYTICAL REPORTS
LABORATORY REPORT

Prepared For: Mactec E&C - Petaluma
5341 Old Redwood Hwy #300
Petaluma, CA 94954
Attention: Gary Lieberman

Project: 4400051035

Sampled: 05/10/05
Received: 05/13/05
Issued: 06/07/05 09:15

NELAP #01109CA Nevada #AZ907

The results listed within this Laboratory Report pertain only to the samples tested in the laboratory. The analyses contained in this report were performed in accordance with the applicable certifications as noted. All soil samples are reported on a wet weight basis unless otherwise noted in the report. This Laboratory Report is confidential and is intended for the sole use of Del Mar Analytical and its client. This report shall not be reproduced, except in full, without written permission from Del Mar Analytical. The Chain of Custody, 1 page, is included and is an integral part of this report.

This entire report was reviewed and approved for release.

CASE NARRATIVE

<table>
<thead>
<tr>
<th>LABORATORY ID</th>
<th>CLIENT ID</th>
<th>MATRIX</th>
</tr>
</thead>
<tbody>
<tr>
<td>POE0354-01</td>
<td>DRUM 94</td>
<td>Sludge</td>
</tr>
<tr>
<td>POE0354-02</td>
<td>DRUM 113</td>
<td>Solid</td>
</tr>
<tr>
<td>POE0354-03</td>
<td>INSUL</td>
<td>Solid</td>
</tr>
<tr>
<td>POE0354-04</td>
<td>SOFTNER</td>
<td>Solid</td>
</tr>
</tbody>
</table>

SAMPLE RECEIPT: Samples were received intact, at 4°C, on ice with chain of custody documentation.

HOLDING TIMES: All samples were analyzed within prescribed holding times and/or in accordance with the Del Mar Analytical Sample Acceptance Policy unless otherwise noted in the report.

PRESERVATION: Samples requiring preservation were verified prior to sample analysis.

QA/QC CRITERIA: All analyses met method criteria, except as noted in the report with data qualifiers.

COMMENTS: No significant observations were made.

SUBCONTRACTED: Refer to the last page for specific subcontract laboratory information included in this report.

ADDITIONAL INFORMATION: N-1 - Samples required dilution of 1000x.

Reviewed By:

Del Mar Analytical - Phoenix
Karen Maxwell For Linda Eshelman
Project Manager
The results pertain only to the samples tested in the laboratory. This report shall not be reproduced, except in full, without written permission from Del Mar Analytical.

POE0354 <Page 3 of 15>
### TCLP Extraction for Metals

<table>
<thead>
<tr>
<th>Sample ID: POE0354-01 (DRUM 94 - Sludge)</th>
<th>Method</th>
<th>Batch</th>
<th>Extraction Start Date</th>
<th>Extraction End Date</th>
<th>Data Qualifiers</th>
</tr>
</thead>
<tbody>
<tr>
<td>LP Extraction</td>
<td>EPA 1311</td>
<td>PSE1807</td>
<td>5/17/2005</td>
<td>5/18/2005</td>
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</tr>
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</table>

<table>
<thead>
<tr>
<th>Sample ID: POE0354-02 (DRUM 113 - Solid)</th>
<th>Method</th>
<th>Batch</th>
<th>Extraction Start Date</th>
<th>Extraction End Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>TCLP Extraction</td>
<td>EPA 1311</td>
<td>PSE1807</td>
<td>5/17/2005</td>
<td>5/18/2005</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Sample ID: POE0354-04 (SOFTNER - Solid)</th>
<th>Method</th>
<th>Batch</th>
<th>Extraction Start Date</th>
<th>Extraction End Date</th>
<th>Data Qualifiers</th>
</tr>
</thead>
</table>

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The results pertain only to the samples tested in the laboratory. This report shall not be reproduced, except in full, without written permission from Del Mar Analytical.
**TCLP METALS**

<table>
<thead>
<tr>
<th>Analyte</th>
<th>Result</th>
<th>Reporting Limit</th>
<th>Units</th>
<th>Spike Level</th>
<th>Source Result</th>
<th>%REC Limits</th>
<th>RPD Limit</th>
<th>Data Qualifiers</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Sample: P5E1907, Extracted: 05/19/05</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
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</tr>
<tr>
<td>Tank Analyzed: 05/19/2005 (P5E1907-BLK1)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
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<tr>
<td>LP Silver</td>
<td>ND</td>
<td>0.0050</td>
<td>mg/l</td>
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*Del Mar Analytical - Phoenix*

Iron Maxwell For Linda Eshelman

Project Manager

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**TCLP METALS**

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### INORGANICS

**Sample: E&C - Petaluma**  
5341 Old Redwood Hwy #300  
Petaluma, CA 94954  
Attention: Gary Lieberman

**Project ID:** 4400051035  
**Report Number:** POE0354  
**Sampled:** 05/10/05  
**Received:** 05/13/05

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**POE0354 <Page 11 of 15>**
**METHOD BLANK/QC DATA**

**TCLP EXTRACTION FOR METALS**

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Certification Summary

Del Mar Analytical - Phoenix

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Nevada and NELAP provide analyte specific accreditations. Analyte specific information for Del Mar Analytical may be obtained by contacting the laboratory or visiting our website at www.dmalabs.com.

Contracted Laboratories

Aberquant Analytical

5025 S 33rd Street - Phoenix, AZ 85040
Analysis Performed: Asbestos by PLM
Samples: POE0354-03

Del Mar Analytical - Phoenix

Project Manager

Oren Maxwell For Linda Eshelman

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Polarized Light Microscope (PLM) Analysis for Asbestos

Job Number: 200503490
Client: DEL MAR ANALYTICAL

9830 S 51ST ST STE B120
PHOENIX, AZ 85044-0000
Office Phone: (480) 785-0043
Fax: (480) 785-0851

# Samples: 1


PLM analysis for asbestos in bulk samp

Client Job: POE0354
PO Number:
Report Date: 5/16/2005
Date Analyzed: 5/16/2005

Method and Analysis Information:
Fiberquant Internal SOP: PLM

Each bulk sample is first dissected under a 7-30x magnification stereo-microscope. This examination is used to determine the general type of sample, how many and what type of layers it has, and initial estimates of fiber types and quantities. Second, liquid media mounts are made of each layer - such mounts may be of selected fibers (used solely for identification purposes) or may be representative of the layer as a whole (used for quantitation purposes). The mounts may be made in a synthetic Canadian balsam, one of several solvents, or in refractive index oils (media of known refractive index). Generally, a variety of different mounts are made: some optimized for fiber visibility, some optimized for fiber identification, and some optimized for fiber quantitation. The mounted slides are then examined at 50-400x magnification on a Nikon Labphot-pol microscope. Optical characteristics are used to identify each observed fiber type; the optical data are contained for each sample on its detail analysis sheet, attached.

Current EPA, NESHAP and OSHA regulations designate a result of <1% asbestos as "negative" and >1% asbestos as "positive". Samples containing layers that have been determined to be "positive" may have to be handled differently during a renovation or demolition then samples whose layers have been determined to be "negative."

The method of fiber analysis and identification is the EPA Method 600/R-93/116. The method of fiber quantitation is an estimation technique in which the analysts quantitate is routinely calibrated by reference quantitation standards, and which has been shown to be equivalent in precision and accuracy to point counting. Friability is estimated for the purposes of deciding when to point count. Friability determined in the field take precedence over those determined in the laboratory. Those sample layers which are friable and estimated by the analyst to contain <= 1% asbestos are point counted using 400 points. Such point counting is required by NESHAP (National Emission Standards for Hazardous Air Pollutants, Nov. 1990). This means that PLM analysis is not capable of conclusively determining whether a layer containing close to 1% asbestos is actually "positive" or "negative". For this reason, Fiberquant refers to results where asbestos was detected but <= 1% as "borderline negative", and resolves where asbestos was >1% but <= 2% as "borderline positive" to indicate the uncertainty in assigning a "positive" or "negative" label. In the sample summary, "ND" means that no asbestos was detected during the analysis. A "TR" or "Trace" of asbestos reported is defined for our purposes as the detection of several asbestos fibers during the analysis; this level would be right at the limit of detection for the method. Trace is only reported on the analysis detail - in the summary a trace would be reported as <=1%. The limit of detection (the smallest % of asbestos that can be detected) varies greatly depending on the matrix in which the asbestos is found. As little as 0.001% asbestos can be detected in favorable samples, while detection in unfavorable samples may approach the detection limit of 1% stated in the method. During the analysis, the analyst, for Fiberquant identification purposes only, determines the "apparent sample type" and "apparent layer types." It must be emphasized that these types are only what is apparent. Often, different materials appear similar or identical after sampling, so the analyst may assign a type other than what was sampled.

Floor tiles present a special problem for PLM asbestos analysis. Floor tile contain chrysotile fibers so thin that they cannot be resolved by optical methods. In such a case, we may observe a percentage of asbestos which is lower than the actual percentage, or not observe asbestos at all when some is present. For this reason, floor tiles reported as negative should be confirmed to be negative using transmission electron microscope (TEM) analysis. Likewise, vermiculite insulation materials containing traces of asbestos present a problem for routine PLM analysis - the amphiboles are sometimes present in trace amounts inhomogeneously distributed. We recommend a hydro-separation technique for such samples.

Vermiculite-containing samples may contain trace amounts of asbestos which may or may not be detected during routine PLM analysis. For this reason, loose vermiculite samples reported as negative should be confirmed to contain no amphibole using hydroseparation techniques.

The samples were analyzed under the following ongoing quality assurance program: Blank samples are routinely analyzed to maintain contamination-free materials. Each analyst has at least a bachelor's degree in physical science, and has also completed extensive training specific to asbestos analysis for 1-3 months before being allowed to analyze client samples. Qualitative reference samples are routinely analyzed to assure that analysts can identify asbestos and asbestos-like fibers. Quantitative reference samples are routinely analyzed to calibrate and characterize the estimation procedure. Microscope alignment is checked each day. Refractive index oils are calibrated at least quarterly. At least 10% of client samples are re-analyzed from scratch by a different analyst than the original, and any discrepancies are resolved for the sample and similar sample types before the result are reported. All quality checks performed for these samples were in control except as detailed in the "Analytical Notes" below. All analysts participate in interlab round robin testing to assure competence. Fiberquant is accredited by NVLAP for the analysis of bulk samples for asbestos using PLM. Accreditation does not imply endorsement by the EPA, any other United States governmental agency or any private agency or association. Each lab analysis refers only to the sample tested, and may not, due to the sampling process, be representative.
PLM Analysis Details

Job Number: 200503490

Sample | POE0354-03
Lab Number | 2005-03490-1
Analyzed By | LWJ 5/16/2005
Apparent Smp Type | Insulation
Pos Layer? No
Fibrous Mat
Condition: acceptable
Mobile Phone | 602-276-6139
Fax | 602-276-4558

Non-Fibrous Components (in approx. decreasing order): powder,

<table>
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<tr>
<th>Layers</th>
<th># Layers 2</th>
<th>Pos Layer? No</th>
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<tr>
<td>Non-Fibrous Components (in approx. decreasing order): powder,</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Fibers</td>
<td>Color</td>
<td>Friability</td>
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<tr>
<td>-------</td>
<td>-------</td>
<td>------------</td>
</tr>
<tr>
<td>1</td>
<td>synthetic fiber (extruded)</td>
<td>W</td>
</tr>
<tr>
<td>2</td>
<td>glass fiber</td>
<td>CL</td>
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Fiber Identification: synthetic fiber/ extruded glass fiber

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<th>Fiber Type</th>
<th>Color</th>
<th>Morph</th>
<th>Iso</th>
<th>Pleo</th>
<th>Bi</th>
<th>Elg</th>
<th>Ext</th>
<th>Oil</th>
<th>Col Par</th>
<th>Col Per</th>
<th>RI Par</th>
<th>RI Per</th>
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</tbody>
</table>

Sample Analytical Note

Procedure: tweezed apart using forceps.

Printed: 16-May-05
Original Print Date: 16-May-05

Analyst: LILIAN W. JIANG

Larry S. Pierce, Approved Accreditation Signatory
## SUBCONTRACT ORDER - PROJECT # POE0354

### SENDING LABORATORY:
- Del Mar Analytical - Phoenix
  - 9830 South 51st Street, Suite B-120
  - Phoenix, AZ 85044
  - Phone: (480) 785-0043
  - Fax: (480) 785-0851
  - Project Manager: Linda Eshelman

### RECEIVING LABORATORY:
- Fiberquant Analytical
  - 5025 S.33rd Street
  - Phoenix, AZ 85040
  - Phone: (602) 276-6139
  - Fax: (602) 276-4558

---

Standard TAT is requested unless specific due date is requested => Due Date: ___________ Initials: ___________

<table>
<thead>
<tr>
<th>Analysis</th>
<th>Expiration</th>
<th>Comments</th>
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<tr>
<td>Sample ID: POE0354-03 Solid Asbestos By PLM-O</td>
<td>Sampled: 05/10/05 14:20</td>
<td>Vegas samples Fiberquant</td>
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<tr>
<td>05/12/05 14:20</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Containers Supplied: 8 oz Jar (POE0354-03B)

---

**SAMPLE INTEGRITY:**
- All containers intact: 
  - Yes [ ] No [ ]
- Sample labels/COC agree: 
  - Yes [ ] No [ ]
- Samples Received On Top: 
  - Yes [ ] No [ ]
- Samples Received at (temp): 
  - 13X8

**Date:** 5-18-05 **Time:** 13X8

**Received By:** [Signature]

**Date:** 5-18-05 **Time:** 14X6

**Delivered By:** [Signature]

**Date:** 5-13-05 **Time:** 14X6

**Delivered By:** [Signature]

**Date:** 5-13-05 **Time:** 14X6

---

Page 1 of 1
ATTACHMENT 3

SIGNED MANIFESTS
UNIFORM HAZARDOUS WASTE MANIFEST

3. Generator's Name and Mailing Address
NO. NEVADA, RAILWAY
1100 AVE. N. 2
ELY, NV 89315

4. Generator's Phone (775) 289-2085

5. Transporter 1 Company Name
Envirosolve, LLC

6. US EPA ID Number
6KD987084068

7. Transporter 2 Company Name

8. US EPA ID Number

9. Designated Facility Name and Site Address
ASH GROVE CEMENT CO.
5001 NORTH SANTA FE RD
CHANUTE, KS 66720

10. US EPA ID Number
KSO034203318

11. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number)

<table>
<thead>
<tr>
<th>No.</th>
<th>Type</th>
<th>Total Quantity</th>
<th>Unit</th>
<th>Waste No.</th>
</tr>
</thead>
<tbody>
<tr>
<td>a.</td>
<td>X WASTE, Flammable liquids, n.o.s. (KEROSENE), 3, UN1993, AG III</td>
<td>7 DM</td>
<td>3.85 G</td>
<td>D001</td>
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<tr>
<td>b.</td>
<td>WASTE, Non-RCRA/Non-DOT-Solid (DRIED PAINT)</td>
<td>1 DM</td>
<td>55 G</td>
<td>N/A</td>
</tr>
<tr>
<td>c.</td>
<td>WASTE, Non-RCRA/Non-DOT-Solid (TRASH &amp; DEBRIS)</td>
<td>1 DM</td>
<td>55 G</td>
<td>N/A</td>
</tr>
<tr>
<td>d.</td>
<td>X WASTE, Corrosive solids, basic, inorganic n.o.s. (ALKALINE CLEANS)</td>
<td>1 DM</td>
<td>55 G</td>
<td>N/A</td>
</tr>
</tbody>
</table>

12. Containers
13. Total Quantity
14. Unit
15. Waste No.

J. Additional Descriptions for Materials Listed Above
11a) APR# AG1346; 11b) APR# 03-05488-915-15; 11c) APR# 03-05488-915-16; 11d) APR# 03-05488-908-06

K. Handling Codes for Wastes Listed Above

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of the consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.

If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste-management method that is available to me that I can afford.

Printed/Typed Name
MARC BAKSHI
Signature

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name
MARC HYATT
Signature

18. Transporter 2 Acknowledgement of Receipt of Materials
Printed/Typed Name
Signature

19. Discrepancy indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.
Printed/Typed Name
Signature

---

Style F15 \( \text{LABELMASTER} \) \( (800) \) 621-5006 \ www.labelmaster.com

FPA Form RTNRA-39 Rev. 11/01/99-Español disponible en reclamo.
**NON-HAZARDOUS WASTE MANIFEST**

1. Generator's US EPA ID No. 5R.V.0.0.0.0.8.0.2670.4.2.2.8.8
2. Page 1 of 4

3. Generator's Name and Mailing Address
   **NO. NEVADA RAILWAY**
   **1100 AVEA AVE.; E.IY., NV 89315**

4. Generator's Phone (775) 281-2095

5. Transporter 1 Company Name
   **ENVIRO SOLVE, LLC**
   US EPA ID Number: 0.K.D9.9.8.7.0.8.4.0.6.8

6. Transporter 1 Phone
   918-587-9664

7. Transporter 2 Company Name
   **ENVIRO SOLVE, LLC**
   2131 SOUTH ROSEDALE
   TULSA, OK 74107
   US EPA ID Number: 0.K.D9.8.7.0.8.4.0.6.8

8. Transporter 2 Phone
   918-587-9664

9. Designated Facility Name and Site Address
   **ENVIRO SOLVE, LLC**
   2131 SOUTH ROSEDALE
   TULSA, OK 74107

10. US EPA ID Number
    918-587-9664

11. Waste Shipping Name and Description

   a. **WASTE, NON-RCRA/Non-DOT SOLID - GREASE**
      Quantity: 270.0, Unit: 14.85, Rate: G

   b. **WASTE, NON-RCRA/Non-DOT SOLID - (CRATER GREASE)**
      Quantity: 600.0, Unit: 3.00, Rate: G

   c. **WASTE, ANTIFREEZE**
      Quantity: 300.0, Unit: 1.65, Rate: G

   d. **WASTE, NON-RCRA/Non-DOT SOLID - Crushed & Drained POL FILTERS**
      Quantity: 200.0, Unit: 1.10, Rate: G

12. Containers

13. Total Quantity

14. Unit (Wt/Val)

15. Special Handling Instructions and Additional Information

16. Generator's Certification: I certify the materials described above on this manifest are not subject to federal regulations for reporting proper disposal of Hazardous Waste.

   **Mark Bassett**
   Signature: Mark Bassett
   6/12/2005

17. Transporter 1 Acknowledgement of Receipt of Materials

   **Mike Hyatt**
   Signature: Mike Hyatt
   6/12/2005

18. Transporter 2 Acknowledgement of Receipt of Materials

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of waste materials covered by this manifest except as noted in Item 19.

   **Printed/Typed Name**
   **Signature**
   **Month Day Year**

**ORIGINAL - RETURN TO GENERATOR**
Mr. Daniel Burns  
MACTEC Engineering & Consulting, Inc.  
6280 South Valley View Blvd., Suite #722  
Las Vegas, NV 89118

re: Scope of Work Approval, Northern Nevada Railway Museum in Ely, NV

Dear Mr. Burns,

The Nevada Division of Environmental Protection has received your Scope of Work for the Northern Nevada Railway Museum Brownfields Project for the purposes of categorizing and identifying several drums located at that property. While we agree with the narrative provided for the work to be performed, we are unable to provide funding as detailed in the budget inventory. Due to the nature of the project, where costs are likely to depend on the results of initial identification activities, we cannot project what the laboratory analytical costs will ultimately be.

In order to serve the best interests of the program and the site owner, we have decided to approve a reasonable project budget, based on our experience with these types of projects, of $35,000 to include the field assessment, laboratory analyses, and drum removal. Rates for equipment and costs should comply with those provided in the Scope of Work. We will be open to re-assessing the project budget based on considerations of field findings. The start date for the project shall be considered to be the date of this correspondence.

If you have any questions, please feel free to contact me at (775) 687-9384.

Sincerely,

Scott Smale  
Bureau of Corrective Actions

cc: (w/attached SOW)  
Keli Stoeffler, BCA  
Standu Sergeant, OFPM
April 1, 2005

Mr. Scott Smale
Brownfields/State Response
Bureau of Corrective Actions
Nevada Division of Environmental Protection
333 W. Nye Lane, Room 138
Carson City, Nevada 89706

SCOPE OF WORK DEVELOPMENT
NORTHERN NEVADA RAILWAY MUSEUM
BROWNFIELDS PROJECT
11th STREET and AVENUE A
ELY, NEVADA

PROP05LVEG.10

Dear Mr. Smale:

MACTEC Engineering and Consulting, Inc. (MACTEC) is pleased to present this proposal and not-to-exceed budget to prepare and implement drum characterization, sampling and removal activities for the Nevada Division of Environmental Protection (NDEP) Bureau of Corrective Actions, Brownfields Program.

The Subject Property, a former operating rail yard constructed in early 1900’s to serve the local copper mining operations, was active until mining operations ceased in the early 1980’s. The property currently belongs to the White Pine Historical Railroad Foundation (dba Nevada Northern Railway Museum), and is used for tourist excursions and the restoration and preservation of the Nevada Northern Railway historic facilities, yards, and rail collection. The facility is comprised of the depot, roundhouse, coal chute, yards and a complex of carpentry, fabrication, maintenance, and storage shops.

This proposal has been prepared as requested by NDEP on March 25, 2005. During a scoping meeting held on November 8, 2004 for another Brownfields Project (Old White Pine County Landfill), a brief tour of the railway museum facilities was conducted by NDEP and MACTEC representatives. Based upon the tour, this proposal includes the levels of effort and cost estimates for following Scope of Services:

- Document Preparation
- Field Activities
- Drum Content Analyses
- Drum Removal, Transport and Disposal
- Submittals

SCOPE OF WORK TASKS

Document Preparation

The objective of this Task is to develop and communicate the procedures for implementing the field portion of the Scope of Work Tasks, which consists primarily of preparing a Health and Safety Plan. A Standard Operating Procedure (SOP) for drum sampling (SOP #2009, dated 11/16/1994, Revision # 0) has been
developed by the USEPA Environmental Response Team (ERT) and will be used as the basis for the completion of the field activities.

**Field Activities**

Field activities, consisting of Drum Inspection, Staging, Sampling, and Categorization will follow the USEPA ERT SOP (#2009). This will include use of photoionization device (PID), flame ionization device (FID), lower explosive limit/oxygen (LEL/O2, and radiation detection meters, along with chemical classification field testing kits.

Based upon preliminary field categorization, drums will either be left in place for overpacking, or staged for bulking and/or compositing with like contents.

**Drum Content Analyses**

It is anticipated that forty to fifty drums will need to be addressed for this project. Samples will be collected from each drum that is to be overpacked. From drums that are to be bulked and/or composited, representative samples will be collected and submitted to an analytical laboratory to verify the field categorization findings for the purpose of disposal. It is anticipated that samples will be collected and analyzed for Ignitability (1010) and one or more of the following RCRA Hazardous Waste Characterization analyses: pH (9040/9045), total cyanide (9010), total sulfide (9030), TCLP Extraction/Leachate Analyses (1311/6010/8270), VOCs (8260), SVOCs (8270), Chlorinated Pesticides and PCBs (8081/8082), Chlorinated Herbicides (8151), and RCRA (8) Metals (200.7/6010).

In addition to the RCRA Hazardous Waste Characterization analyses, samples may be submitted for one or more of the following analyses: Organophosphorous pesticides (8141), Chlorinated Hydrocarbons (8021), polynuclear aromatic hydrocarbons (8310), total petroleum hydrocarbons (8015) and total residual petroleum hydrocarbon (TRPH) (Method 418.1).

Sampling equipment (sampling thieves and coliwassas) and personal protective equipment will be placed in a drum(s) and included in the disposal as investigation-derived waste.

**Drum Removal, Transport and Disposal**

Drum removal, transport, and disposal will depend on the results of the Drum Inspection, Staging, Sampling, Categorization and Analyses.

**Submittals**

It is currently unknown if the Nevada Northern Railway Museum has an EPA ID Number. Therefore, for estimating purposes, it is assumed that a RCRA Subtitle C Site Identification Form – Initial Notification of Regulated Waste Activity (EPA Form 8700-12) will be prepared for signature by the appropriate Nevada Northern Railway Museum representative for submittal to the NDEP Bureau of Waste Management. Information presented on the form will be based upon the preliminary field categorization
findings.

Packaging, Removal, Transport, and Disposal activities will be evaluated and priced based upon the preliminary field categorization. Analytical laboratory results will be used to verify field characterization results and will be provided to the disposal facility for final acceptance approval and costing.

SCHEDULE AND FEE

MACTEC will perform the activities described above on a time and materials, not-to-exceed basis for a fee of $72,620.10. MACTEC's estimated fee is based on the following assumptions:

- No Level A or B personnel protection equipment is required.
- Field activities described herein are anticipated to occur the week of April 25, 2005.
- Due to Setalash Ignitibility testing unit pricing ($7,000) and availability (4 weeks from order date), MACTEC will not conduct Setalash Ignitibility testing in the field as specified by SOP #2009. Ignitibility testing will be accomplished by an analytical laboratory instead.
- No QA/QC Sampling, Level 3 or Level 4 data packages, or data validation is required for this project.
- Costs for drum contents handling, transport, and disposal are not included. These costs will be estimated based upon preliminary field categorization and finalized based upon laboratory analytical results.
- Unless otherwise specified by NDEP, field testing equipment specified in EPA ERT SOP #2009 that is purchased for this project will become the property of the State of Nevada Brownfields Program, or its designee. This equipment will be turned over to the NDEP Brownfields Program Coordinator, or designee upon completion of its use.

MACTEC appreciates the opportunity to provide environmental consulting services for NDEP, Bureau of Corrective Actions. If you should have any questions, please call either of the undersigned at (702) 251-5449 or (775) 888-9992, respectively.

Sincerely,

Daniel C. Burns, P.G., C.E.M.  
Associate

Bruce L. Wilcer, P.G.
Principal

Attachments: Cost Sheet