

# **ECS** Southeast, LLP

**Environmental Site Assessment Report** 

Pharr Mill Road and Mulberry Road Property Harrisburg, Cabarrus County, North Carolina ECS Project No. 49:17330-A

August 9, 2022

Prepared For: Ms. Brooke Bures Trammell Crow Company 500 W 2<sup>nd</sup> Street Suite 1400 Austin, Texas 78701







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Reference: Environmental Site Assessment Report Pharr Mill Road and Mulberry Road Property Pharr Mill Road and Mulberry Road Harrisburg, Cabarrus County, North Carolina ECS Project No. 49:17330-A

Dear Ms. Bures:

ECS Southeast, LLP (ECS) has prepared this Environmental Assessment Report describing supplemental assessment activities and results of soil sampling and soil gas screening conducted at the subject site. Assessment activities were conducted in accordance with the ECS Proposal for Environmental Assessment Services (ECS Proposal Number: 49:31802) dated June 7, 2022 and authorized on June 14, 2022.

ECS appreciates the opportunity to provide our environmental consulting services. If you have any questions concerning this report or this project, please contact us.

Sincerely,

ECS SOUTHEAST, LLP

Ron Navarro, G.I.T. Environmental Staff Project Manager <u>rnavarro@ecslimited.com</u> 919-770-2852

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Scott M. Werley, P.G. Principal Geologist <u>swerley@ecslimited.com</u> 984-297-7285

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#### **1.0 BACKGROUND INFORMATION**

The subject property is located at Pharr Mill Road and Mulberry Road, Harrisburg, North Carolina. The subject property is identified by the Cabarrus County Online Geographic Information Systems (GIS) as Parcel Identification Number (PIN) 55179854430000, consists of 132.792 acres, and is owned by Mulberry Holdings LLC. A topographic location map for the site is included as **Figure 1**. An aerial photograph site location map is included in **Figure 2**.

ECS completed a Phase I Environmental Site Assessment (ESA) at the site on June 3, 2022 (ECS Project No. 17330). In the Phase I, ECS observed three above ground storage tanks (ASTs) in the vicinity of agricultural buildings present on the central portion of the subject property. One AST labeled as containing motor oil was observed to the south of the workshop shed. Staining was observed on the ground surface beneath the AST. Staining was also observed on the soil surface throughout the interior of the workshop shed. ECS considers the staining encountered in the vicinity of the AST as well as throughout the surface of the interior of the workshop shed to be a Recognized Environmental Condition (REC) for the subject property.

ECS was requested to conduct environmental assessment services at the subject property in an effort to evaluate whether the RECs identified have adversely impacted the subject property. Additionally, ECS was requested to screen soil gas along the northern portions of the subject property to assess for possible methane vapor intrusion concerns and flammable/explosive hazards from the off-site Greenway Waste Solutions of Harrisburg, LLC C&D Landfill which adjoins the subject property to the northeast.

#### **2.0 SCOPE OF SERVICES**

# **2.1 Soil Assessment Activities**

Based on our understanding of the project information, ECS conducted the following soil assessment activities:

- ECS mobilized an environmental professional to the project site to collect nine (9) soil samples in an effort to identify soil impacts from the AST and interior of the workshop shed.
- Soil borings were advanced using a decontaminated hand auger. A soil boring was made in the area of stained soil in the vicinity of the AST and was sampled at a depth of 1 foot below ground surface (bgs) and 3 feet bgs. An additional three (3) borings were advanced on three sides of the soil staining at approximately 5 feet stepping out from the central sample to a depth of 2 feet bgs. Two soil borings were advanced inside of the workshop with stained surfaces and each boring was sampled at a depth of 1 ft bgs and 3 ft bgs. Photodocumentation has been included as Appendix A. Boring logs are available in Appendix B. The approximate locations of soil samples are located in Figure 3.
- The soil sample containers were labeled and delivered to Rapid Environmental Diagnostic (RED) Lab located in Wilmington, North Carolina for analysis. Each sample was submitted to be analyzed for total petroleum hydrocarbons (TPH) as gasoline range organics (GRO) and as diesel range organics (GRO) using ultraviolet fluorescence (UVF). ECS maintained chain-of-custody (COC) procedures throughout the sample collection and transportation process for the subsurface soil samples. A copy of the COC documentation is included along with the laboratory data in **Appendix** C.

# 2.2 Soil Gas Screening Activities

# **Soil Gas Sample Point Installation Activities**

On July 6, 2022, ECS installed three soil gas points identified as SG-1 through SG-3, at the approximate locations illustrated on the attached Figure 2. Using a decontaminated stainless-steel hand auger, sample points SG-1, SG-2, and SG-3 were installed to an approximate depth of 5 feet (ft) below ground surface (bgs). A vapor implant connected to a length of Nylaflow tubing was then positioned near the base of each boring. Clean filter sand was placed in the annular space around, and approximately 6 inches above the vapor implant, and bentonite was placed in the remaining annular space. Distilled water was poured into the bentonite and allowed to hydrate for at least 2 hours prior to screening.

# **Soil Gas Screening Activities**

Following installation of the sample points on July 6<sup>th</sup>, ECS performed soil gas screening activities of SG-1 through SG-3. Soil gas sample points were screened for methane, oxygen, carbon dioxide, hydrogen sulfide, and pressure utilizing a Landtec GEM 5000 Plus Landfill Gas Monitor (GEM 5000), as well as for volatile organic vapors utilizing a photoionization detector (PID).

ECS re-mobilized to the site on July 7, 2022 for a second screening event. Following completion of the second soil gas screening, the sampling equipment was removed, and the borings were backfilled with bentonite and soil cuttings to match the pre-existing grade of the land surface.

#### 3.0 RESULTS

## **3.1 Soil Assessment Activities Results**

TPH-GRO and/or TPH-DRO were detected above laboratory detection limits in the soil samples collected as part of soil assessment activities. TPH-GRO was detected above its respective NCDEQ Action Level of 50 milligrams per Kilogram (mg/Kg) in the soil sample identified as SB-5-1, which was obtained inside of the workshop at a depth of 1 ft bgs. TPH-DRO was detected above its respective NCDEQ action level of 100 mg/Kg in the soil samples identified as SB-1-1, SB-5-1, SB-6-1, and SB-6-3. SB-1-1 was obtained in the vicinity of the AST on the exterior of the shed. SB-6-1, SB-5-1, and SB-6-3 were obtained in the interior of the shed. The soil analytical results are summarized in **Table 1**, and a copy of the laboratory report and chain-of-custody are available in Appendix B.

# **3.2 Soil Gas Screening Results**

Methane was not detected in the three soil gas screening points installed as part of this assessment. Hydrogen sulfide was detected at 1 part per million (ppm) on the first day of screening on July 6, 2022, which is above NCDEQ Vapor Intrusion Screening Levels (VISLs) for residential and non-residential scenarios, but below the lower explosive limit for hydrogen sulfide. Hydrogen sulfide was not detected on the second day of screening.

Static pressures ranged from 0.01 inches of water (in- $H_2O$ ) at SG-1 to 0.06 in- $H_2O$  at SG-2. Differential pressures ranged from 0.020 in- $H_2O$  at SG-2 to 0.030 in- $H_2O$  at SG-3. The soil gas and pressure screening results are summarized on **Table 2**.

The results of the methane screening and pressure readings did not indicate methane concentrations greater than the NCDEQ Brownfields Program Threshold Criteria for Methane Site Development (December 2020), including properties intended for residential reuse. This document indicates residential redevelopment would not be permitted if methane concentrations exceed 30 percent by volume (% bv) and a mitigation system is required if methane concentrations exceed 1.25 % bv within 50 feet of proposed buildings. In addition, this document indicates that there can be no measurable static pressure differential greater than atmospheric pressure within 200 feet of proposed buildings.

#### 4.0 FINDINGS AND CONCLUSIONS

Based on the field activities laboratory analytical results of the soil gas samples collected during this assessment, ECS concludes the following:

- On July 6 and July 7, 2022, ECS screened three (3) soil gas points (SG-1 through SG-3) that were installed via hand auger at the subject property on July 6. The soil gas screening points were abandoned after the second screening event on July 7.
- Methane was not detected in the soil gas points on either day of the screening event. Hydrogen sulfide was detected on July 6 at a concentration of 1 ppm. Hydrogen sulfide was not detected on the second day of screening.

- Methane readings collected on July 6 and 7, 2022, were not greater than the NCDEQ Brownfields Program Threshold Criteria for Methane Site Development intended for residential reuse or the 1.25% threshold for requiring a methane mitigation system.
- The maximum differential pressure identified was 0.030 in H<sub>2</sub>0, which is within the accuracy of the Landtec GEM 5000 Plus (discussed below). ECS opines such negligible pressures do not constitute "measurable" differential pressures as contemplated by the Threshold Criteria for Methane Site Development.
- Based upon information provided by the Landtec GEM 5000 Plus manufacturer, the accuracy of the Landtec GEM 5000 Plus is +/- 0.5% by volume (bv) for methane, +/- 2.0 in H<sub>2</sub>0 for static pressure, and +/- 0.7 in H<sub>2</sub>0 for differential pressure. As such, each of the static and differential pressure readings, and methane readings recorded during this investigation, were within the accuracy limits of the instrument and are considered negligible. No further methane or pressure screening activities appear to be warranted for the subject property.
- A total of 9 soil quality samples were obtained in the vicinity of the leaking AST on the subject property, as well as in areas in the interior of the workshop shed that had had visual evidence of petroleum staining.
- Four out of the nine soil samples collected were analyzed for TPH-GRO and/or TPH-DRO above their
  respective NCDEQ Action levels, indicating that soil had been impacted by the RECs discovered in the
  previous Phase I ESA. Three of those four soil samples were collected at 1 ft bgs, and their respective
  samples collected from 3 ft bgs were below the NCDEQ Action Levels. SB-6-3 collected from 3 ft bgs
  was reported with a concentration of TPH-DRO at 119.7 mg/Kg, in excess of TPH-DRO NCDEQ Action
  Level of 100 mg/Kg.

# **5.0 RECOMMENDATIONS**

Based on the results of this assessment, ECS recommends the following:

- Soil impacted by petroleum hydrocarbons around the AST and interior to the workshop shed be properly removed from the site and disposed.
- Confirmatory post-excavation soil samples be taken in an effort to confirm that soils on site have been adequately remediated to below NCDEQ Action Levels.
- A copy of this report be kept for future reference.

#### **6.0 QUALIFICATIONS OF REPORT**

The activities and evaluative approaches used in this assessment are consistent with those normally employed in environmental assessment projects of this type and in this area. Our evaluation of site conditions has been based on our understanding of the site project information and the data obtained during our field activities. This report was prepared for the express use of Trammell Crow Company. This report summarizes our evaluation of the conditions on the days of testing. Our findings are based on observations at the site and analysis of a limited number of samples obtained. The findings of this assessment are not intended to serve as an audit of health and safety or compliance issues pertaining to improvements or activities on-site. ECS is not responsible or liable for the discovery and elimination of hazards that may potentially cause damage, accidents, or injuries. No warranty, expressed or implied, is made with regard to the conclusions presented within this report.

This report is provided for the exclusive use of Trammell Crow Company. The scope of services performed in the execution of this assessment may not be appropriate to satisfy the needs of other users. This report is not intended to be used or relied upon in connection with other projects or by other unidentified third parties without the written consent of ECS. The use of this report by any undesignated third party or parties will be at such party's sole risk and ECS disclaims liability for any such third-party use or relian FIGURES





SCALE SHOWN ABOVE



Harrisburg, NC ECS Project Number: 49:17330-A



TABLES

# Table 1:Summary of Soil Analysis Results

Pharr Mill Road and Mulberry Road - Phase II ESA Pharr Mill Road and Mulberry Road Harrisburg, Cabarrus County, North Carolina ECS Project No. 49:17330-A

				Gasoline	Diesel	Total
Sample ID	Sampla Matrix	Sample	Sample	Range	Range	Petroleum
Sample ID	Sample Matrix	Depth (ft)	Date	Organics	Organics	Hydrocarbon
				(C5-C10)	(C10-C35)	(C5-C35)
	NCDEQ Action Lev	vels		50	100	NA
SB-1-1	Soil	1	07/06/22	<9	128.2	128.2
SB-1-3	Soil	3	07/06/22	4.2	24.5	28.7
SB-2	Soil	2	07/06/22	<0.64	20.4	20.4
SB-3	Soil	2	07/06/22	<0.63	10.6	10.6
SB-4	Soil	2	07/06/22	<0.59	0.59	0.59
SB-5-1	Soil	1	07/06/22	51.6	226.8	278.4
SB-5-3	Soil	3	07/06/22	5.9	34.8	40.7
SB-6-1	Soil	1	07/06/22	41.1	493.1	534.2
SB-6-3	Soil	3	07/06/22	<8.1	119.7	119.7

## Notes:

Results Generated by a QED HC-1 analyser.

Concentration values in mg/kg

Soil values are not corrected for moisture or stone content

< = not detected

Bold indicates analytes above NCDEQ Action Levels for TPH DRO / GRO

#### Table 2: Summary of Soil Gas Screening

Pharr Mill Road and Mulberry Road Property Pharr Mill Road and Mulberry Road Harrisburg, Cabarrus County, North Carolina ECS Project No. 49:17330-A

Sample ID	Sample Date	Initial vs. Stabilized	Methane (%)	Carbon Dioxide (%)	Oxygen (%)	Carbon Monoxide (ppm)	Hydrogen Sulfide (ppm)	Static Pressure ("H20)	Differential Pressure ("H20)	PID Reading (ppm)
NCDE	Q Resident	ial VISLs	NS	NS	NS	NS	0.014	NA	NA	NS
NCDEQ	Non-Reside	ental VISLs	NS	NS	NS	NS	0.18	NA	NA	NS
Low	er Explosive	e Limit	5	NA	NA	125,000	43,000	NA	NA	NA
	7/6/2022	То	0.0	0.1	20.1	9	0			
SC 1	7/6/2022	T60	0.0	0.5	19.6	0	0	0.01	0.024	0.1
30-1	7/7/2022	То	0.0	0.1	21.1	2	0			
	7/7/2022	T60	0.0	1.1	18.9	2	0	0.02	0.025	0.0
	7/6/2022	То	0.0	0.2	19.5	0	1			
56.2	7/6/2022	T60	0.0	0.1	19.6	0	1	0.06	0.027	10.2
30-2	7/7/2022	То	0.0	0.1	20.7	0	0			
	7/7/2022	T60	0.0	2.6	18.0	0	0	0.06	0.020	0.0
	7/6/2022	То	0.0	0.2	19.9	0	0			
56.2	7/6/2022	T60	0.0	0.3	19.6	0	0	0.03	0.030	1.4
30-5	7/7/2022	To	0.0	0.1	20.1	0	0			
	7/7/2022	T60	0.0	0.8	19.5	0	0	0.05	0.024	0.0

#### Notes:

% = percent

ppm = parts per million

"H2O = inches of water

NCDEQ = North Carolina Department of Environmental Quality

VISLs = Vapor Intrusion Screening Levels (as of January 2022)

*italics* = constituent detected above residential VISLs

**BOLD** = constituent detected above non-residential VISLs

PID = Photoinoization Detector

NS = No Standard

NA = Not Applicable

Measurements made with Landtec GEM<sup>™</sup> 5000 PLUS Landfill Gas Analyzer and Extraction Monitor

**APPENDIX A:** 

PHOTOGRAPH DOCUMENTATION







**APPENDIX B:** 

**BORING LOGS** 

Project	Name:	Pharr Mill Property	Road and	d Mull	berry F	Road		Sheet: <b>1 of 1</b>	Boring No:	SB-1	
Client:		Trammell	Crow Cor	mpany	,		Pro	oject No.: <b>17330-A</b>			<b>FCo</b>
Site Loc	ation:	Pharr Mill Harrisburg	Road and g, North C	d Mulb arolin	erry R a	oad,	Drille	er: N/A	Drill Rig:	Hand Auger	<b>L</b> 63
Latitude	e/Longitu	ıde:									N I
Depth/	Elevation	PID Reading	Sample Number	Sample Recovery (in)	Graphic Log	Soil Classificati	ion		Di	escription	
-		- 0.0	- SB-1-1	-		SM		Dark Brown SANDY	SILT		
		- 0.0	-SB-1-3			SM		Red Brown SANDY S	ILT		
	-	-									
5-	-5	-							END OF DF	RILLING AT 5.0 FT	
-		-									
		-									
10-	-10										
-	10	-									
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15-	-15	-									
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- 30											
\	/L (First	Encounter	ed)					Boring	Started:	Jul 06 2022	
V V	/L (Com	oletion)						Boring	Completed:	Jul 06 2022	
Remark	S:							Logged	d By:	Seth Greene	
								Princip Respor	al Engineer/ nsible PG:	Joseph Nesto	or

Project	Name:	Pharr Mill Property	Road and	d Mulk	perry F	Road	Sheet: <b>1</b>	of 1	Boring No:	SB-2		
Client:		Trammell	Crow Cor	npany			Project No.: <b>1</b>	7330-A				
Site Loc	ation:	Pharr Mill Harrisburg	Road and ;, North C	d Mulb arolina	erry R a	oad,	Driller: N	I/A	Drill Rig:	Hand Auger		<b>LCS</b>
Latitude	e/Longit	ude:	1									The second secon
Depth/I	Elevation	PID Reading	Sample Number	Sample Recovery (in)	Graphic Log	Soil Classificatio	'n		C	Description		
-		- - - - - -	<del>- SB-2</del>			SM	Dark Brov	wn SANDY SI	LT			
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			eu)								2022	
▼ W Remark	/L (Com	pletion)						Boring C	ompleted:	Jul 06	2022	
nemark:								Logged E	By: Fngineer/	Seth (	Greene	
								Responsi	ible PG:	Josep	h Nesto	r

Project	Name:	Pharr Mill Property	Road and	d Mulk	oerry F	load	Sheet: <b>1 c</b>	of 1	Boring No:	SB-3		
Client:		Trammell	Crow Cor	npany			Project No.: 17	330-A				
Site Loc	ation:	Pharr Mill Harrisburg	Road and ;, North C	d Mulb arolina	erry R a	oad,	Driller: <b>N/</b>	A	Drill Rig:	Hand Auger		<b>LCS</b>
Latitude	e/Longit	ude:	1									T
Depth/I	Elevation	PID Reading	Sample Number	Sample Recovery (in)	Graphic Log	Soil Classificatic	on		D	escription		
-		- - - - - - -	<del>- SB-3</del> -			SM	Dark Brown	n SANDY SIL	Т			
5-	-5	_										
	-10									RILLING AT 5.0	, , ,	
	10											
15	-15											
20-	-20											
25-	-25											
- 30								1				
∑ w	/L (First	Encounter	ed)					Boring St	arted:	Jul 06	2022	
▼ W	/L (Com	pletion)						Boring Co	ompleted:	Jul 06	2022	
Remark	s:							Logged B	y:	Seth G	Greene	
								Principal Responsil	Engineer/ ble PG:	Josepl	h Nestor	·

Project	Name:	Pharr Mill Property	Road and	d Mult	perry F	Road	Sheet: <b>1 of</b> :	<b>1</b> B	oring No:	SB-4	
Client:		Trammell	Crow Cor	npany			Project No.: <b>1733</b>	0-A			<b>FO</b>
Site Loc	ation:	Pharr Mill Harrisburg	Road and ;, North C	d Mulb arolina	erry R a	oad,	Driller: <b>N/A</b>	D	Drill Rig:	Hand Auger	<b>L</b> 62
Latitude	e/Longitu	ıde:									MI I
Depth/	Elevation	PID Reading	Sample Number	Sample Recovery (in)	Graphic Log	Soil Classificatio	n		D	escription	
-		-				ML/CL	Red Brown C	LAYEY SILT			
-		- 0.3	SB-4					E	end of di	RILLING AT 2.0 FT	
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15	-15										
	-20										
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<b>V V</b>	/L (Com	oletion)						Boring Con	mpleted:	Jul 06 202	2
Remark	s:							Logged By: Principal Er	: ngineer/	Seth Green	ne
								Responsibl	le PG:	Joseph Ne	5101

Project	Name:	Pharr Mil Property	Road and	d Mull	perry F	Road	Sh	eet: <b>1 of 1</b>	Boring No:	SB-5	
Client:		Trammell	Crow Cor	npany			Project	No.: <b>17330-A</b>			
Site Loc	ation:	Pharr Mill Harrisburg	Road and g, North C	d Mulb arolin	erry R a	oad,	Driller:	N/A	Drill Rig:	Hand Auger	<b>LCS</b>
Latitude	e/Longit	ude:									
Depth/	Elevation	PID Reading	Sample Number	Sample Recovery (in)	Graphic Log	Soil Classificati	on		D	Description	
-		- 0.0	<del>SB-5-1</del>			SM	Red	Brown SAND	Y SILT		
-		- 0.0	SB-5-3			ML/CL	Red	Brown CLAYE	Y SILT	RILLING AT 3.0 FT	
-	_	-									
5-	-5	-									
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		-									
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		-									
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-		-									
25-	-25	-									
-		-									
-		-									
		-									
v	VL (First	 Encounter	ed)					Bori	ing Started:	Jul 06 2022	
	VL (Com	pletion)						Bori	ing Completed:	Jul 06 2022	
Remark	s:							Log	ged By:	Seth Greene	
								Prin Resi	cipal Engineer/ ponsible PG:	Joseph Nest	or

Project	Name:	Pharr Mil Property	l Road and	d Mull	berry F	Road		Sheet: <b>1 of 1</b>	Boring No:	SB-6	
Client:		Trammell	Crow Cor	npany	,		Pi	roject No.: <b>17330-A</b>			
Site Loc	ation:	Pharr Mill Harrisburg	Road and g, North C	d Mulk arolin	erry R a	oad,	Dril	ller: N/A	Drill Rig:	Hand Auger	<b>L</b> 62
Latitude	e/Longit	ude:			1						
Depth/	Elevation	PID Reading	Sample Number	Sample Recovery (in)	Graphic Log	Soil Classificat	ion		D	Description	
-		- 0.0	<del>SB-6-1</del>	-		SM		Dark Brown SANDY S	ILT		
			CD C 2			ML/CL		Red Brown CLAYEY SI	ILT		
	-5 -10 -15 -20 -25								END OF D	RILLING AT 3.0 FT	
		-									
	/L (First	Encounter	ed)	1	1	<u> </u>		Boring	Started:	Jul 06 2022	
<b>T</b> W	/L (Com	pletion)						Boring (	Completed:	Jul 06 2022	
Remark	s:							Logged	By:	Seth Greene	
								Principa Respons	al Engineer/ sible PG:	Joseph Nesto	pr

**APPENDIX C** 

LABORATORY DATA REPORT AND CHAIN OF CUSTODY DOCUMENTATION



(SBS) or (LBS) = Site Specific or Library Background Subtraction applied to result : (PFM) = Poor Fingerprint Match : (T) = Turbid : (P) = Particulate present

Client Name:	Ecs						RED Lab,	LLC	
Address:	5260 Greens Dui Raleinh. NL 2761	51.14			,	0	5598 Mar	vin K Moss	Lane
Contact:	Ren Navarro	-				TW	Wilmington Wilmingto	NC Bldg, Suit	e 2003
Project Ref .:	17330-A	1					Fach UVF sa	a and Iliw alume	nalvzed for
Email:	R. Nava (10 @ C.F.	5 Murtes	· Com				total BTEX,	GRO, DRO, TPI	H, PAH total
Phone #:	(419) 770 - 281	G	RAPI	D ENVIE	<b>RONMENTAL DIAG</b>	NOSTICS	aromatics a Analyses are	nd BaP. Stand e for BTEX and	ard GC Chlorinated
Collected by:	Sert Gren	CH	AIN OF CL	JSTODY	AND ANALYTICA	L REQUEST FORM	Solvents: VG trans DCE, T analytes in t	C, 1,1 DCE, 1,2 ICE, and PCE, 5 the space prov	cis DCE, 1,2 pecify target ided below.
Sample Collection	TAT Requested	An	alysis Type	- Initials		4			-
Date/Time	24 Hour 48 Hou	ur UV	F GC		San		I otal Wt.	Tare Wt.	Sample Wt.
716/22 12.30		×		SG	S8-1-1		49.5	40.1	9.4
76/22 12:35		~		56	58-1-3		60.5	2.04	10.2
7/6/22 12:40		×		56	58-2	-	1:05	40.1	10.1
716122 12:45		×		SG	58.3		50.H	0.04	10.4
7/6/22 12:50		×		56	SB-4		51.1	40.(	11.0
716/22 12:55		×		56	58-5-1		51.8	40.1	11-7
7/6/22 13.00		*		SG	58.5.3		50.0	40.2	9.8
7/6/22 13:05		×		SG	53-6-1		51.1	40.1	10.0
7/6/22 13:10		×		SG	58-6-3		50.5	104	10.0
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		2			8				
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т. Т									
<b>COMMENTS/REQU</b>	ESTS:				TARGET GC/UVF ANALY	TES:			¥.
Returned 11	NOA+TC: 7	TAT	not liskel				\$		
Relindu	ished by			Accep	ted by	Date/Time	RE	D Lab USE (	NLY
Seth Green	1505						101		
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			ECL	212/21	Wd05:21 220	÷	Ref. No	10-01	5-1