

NEW MEXICO ENVIRONMENT DEPARTMENT VOLUNTARY REMEDIATION AGREEMENT

I. Introduction

This Voluntary Remediation Agreement (“Agreement”) is entered into voluntarily by **Presbyterian Health Services**, represented by **Eric Cornish, Vice President-Real Estate**, who is duly authorized and appointed (“Participant”) and the secretary of the New Mexico Environment Department (“Department”), or his or her designee, pursuant to the Voluntary Remediation Act, Sections 74-4G-1 *et seq.* NMSA 1978, and the New Mexico Voluntary Remediation Regulations (20.6.3 NMAC). The purpose of this Agreement is to detail the obligations and functions of each party relevant to the remediation to be conducted at the **Firestone Store #44W2** (“Site”), located at 701 Central Ave., NW in Albuquerque, under the Voluntary Remediation Program (**VRP Site No. 53221003**). This Voluntary Remediation Agreement is issued pursuant to Section 20.6.3.300 NMAC and the Delegation Order dated May 24, 2021, through which the Cabinet Secretary has delegated signatory authority to the Chief of the Ground Water Quality Bureau.

The activities conducted by the Participant under this Agreement are subject to approval by the Department. The activities conducted by the Participant shall be consistent with this Agreement, all applicable laws and regulations, and any pertinent guidance documents. The Participant shall employ sound scientific, engineering, and construction practices in the voluntary remediation activities at this Site.

II. Statement of Eligibility

The secretary or his designee has determined that the application submitted on behalf of the Participant to the Department on March 31, 2022, is complete, and that the Participant is eligible to enter into this Agreement in accordance with Section 74-4G-5 NMSA 1978 and 20.6.3.200.A NMAC.

III. Parties Bound

This Agreement shall apply to and be binding upon the Participant, its officers, managing agents, directors, principals, partners, employees, receivers, trustees, agents, parents, subsidiaries and affiliates, and upon the Department, its employees, and agents. The Participant has submitted with the application a signed Declaration of Ability and Intent as set forth in 20.6.3.200.B(2) NMAC. No change in ownership, corporate, or partnership status shall in any way alter the Participant’s status or responsibilities under this Agreement unless the Participant or Department terminates this Agreement in accordance with 20.6.3.300.H NMAC.

The Participant shall provide a copy of this Agreement to any subsequent owners or successors before ownership rights are transferred. The Participant shall provide a copy of this Agreement to all contractors, subcontractors, laboratories, and consultants or other parties, which are retained by the Participant, to conduct any work under this Agreement, within 14 days after the effective date of this Agreement or within 14 days of the date of retaining their services.

IV. Designated Project Manager

On or before the effective date of this Agreement, the Department shall designate a project manager. The Primary Applicant specified on the Voluntary Remediation Program Application will function as the project manager for the Participant. Each project manager shall be responsible for overseeing the implementation of this Agreement. The Department project manager will be the Department-designated representative at the site. To the maximum extent possible, communications between the Participant and Department and all documents (including reports, approvals, and other correspondence) concerning the activities performed pursuant to the terms and conditions of this Agreement shall be directed through the project managers. During implementation of this Agreement, the project managers shall, whenever possible, operate by consensus and shall attempt in good faith to resolve disputes informally through discussion of the issues. Each party has the right to change its respective project manager by notifying the other party in writing at least five days prior to the change.

V. Definitions

“Site” means the area described in the Voluntary Remediation Application. This description is attached and incorporated herein as Exhibit 1. All other terms used are defined in Section 74-4G-3 NMSA 1978 and 20.6.3.7 NMAC.

VI. Addresses for All Correspondence

Documents, including reports, approvals, notifications, disapprovals, and other correspondence to be submitted under this Agreement, may be sent by certified mail, first class mail, hand delivery, overnight mail, or by courier service to the following addresses or to such addresses as the Participant or Department designates in writing.

Documents to be submitted to the Department should be sent to:

Mailing Address:

Rebecca Cook
Ground Water Quality Bureau
New Mexico Environment Department
P.O. Box 5469
Santa Fe, NM 87502
E-mail: Rebecca.Cook@state.nm.us
Phone number: (505)670-2135
Fax number: (505) 827-2965

Physical Address:

Rebecca Cook
Ground Water Quality Bureau
New Mexico Environment Department
1190 St. Francis Drive
Santa Fe, NM 87505

Documents to be submitted to the Participant should be sent to:

Mailing Address:

Eric Cornish
Presbyterian Healthcare Services
9521 San Mateo Blvd. NE
Albuquerque, NM 87113

Physical Address:

Same as mailing address

VII. Compliance with Applicable Laws

All work undertaken by the Participant pursuant to this Agreement shall be performed in compliance with all applicable federal, state and local laws, ordinances and regulations, including, but not limited to all Occupational Safety and Health Administration, Department of Transportation, Resource Conservation and Recovery Act, New Mexico Water Quality Control Commission, and New Mexico Environmental Improvement Board Petroleum Storage Tank regulations. In the event of a conflict between federal, state, or local laws, ordinances, or regulations, the Participant shall comply with the most stringent of such laws, ordinances, or regulations, unless provided otherwise in writing by the Department or other appropriate regulatory personnel with jurisdiction over such laws, ordinances, and regulations. Where it is determined that a permit is required under federal, state or local laws, ordinances, or regulations, the Participant shall submit timely and complete applications and take all other actions necessary to obtain all such permits or approvals. The Participant shall be responsible for obtaining all permits that are necessary for the performance of the work hereunder, and for all ongoing or proposed Site activities, and for all ongoing or proposed facility operations.

VIII. Performance Standards and Associated Requirements

The Participant has submitted with their application to the Department a preliminary work plan describing the proposed voluntary remediation activities as they are currently envisioned as being submitted in a final voluntary remediation work plan, which includes a description of the known and suspected contaminants to be addressed by the proposed voluntary remediation activities. This preliminary work plan was prepared pursuant to 20.6.3.200.B NMAC. A copy of the preliminary work plan is attached and incorporated herein as Exhibit 2.

The contaminants covered by this Agreement are described as follows:

- *Soil: Total Petroleum Hydrocarbons, Volatile Organic Compounds, Semi-volatile Organic Compounds*
- *Soil Vapor: Volatile Organic Compounds*
- *Buildings/Structures: asbestos containing materials, lead-based paint*
- *This VRA does not cover Iron, Manganese, Volatile Organic Compounds and Semi-volatile Organic Compounds in Groundwater. Oversight of groundwater remediation remains with the NM Petroleum Storage Tank Bureau (PSTB). PSTB will issue A No Further Action letter upon completion of groundwater remediation activities.*

Voluntary remediation activities undertaken pursuant to this Agreement shall achieve the following standards or risk-based levels:

- *Standards for Ground Water as set forth in Section 20.6.2.3103 NMAC of the Ground and Surface Water Protection Regulations (20.6.2 NMAC);*
- *New Mexico Environment Department Risk Assessment Guidance for Site Investigations and Remediation, June 2022*

It is understood that the parties may wish to modify the list of contaminants and the media in which the contaminants are located, as covered by this Agreement, as additional information about the Site is developed. The Department may approve such changes through approval of work plans and other submittals provided by the Participant during the course of undertaking voluntary remediation activities.

IX. Access

To the extent that the Site or other areas where work is to be performed hereunder are presently owned or controlled by parties other than those bound by this Agreement, the Participant shall obtain or shall use its best efforts to obtain access agreements from the present owners. Best efforts shall include, at a minimum, certified letters from Participant to the present owners of such properties requesting access agreements to permit the Participant, Department, and their authorized representatives' access to such property. Such agreements shall provide access for the Department and authorized representatives of the Department, as specified below. In the event that such access agreements are not obtained, the Participant shall so notify the Department, which may then, at its discretion, assist the Participant in gaining access.

The Participant shall provide authorized representatives of the Department access to the Site and other areas where work is to be performed at all reasonable times. Such access shall be related solely to the work being performed on the Site pursuant to this Agreement and may include, but is not limited to: inspecting and copying of Site and facility records; reviewing the progress of the Participant in carrying out the terms of this Agreement; conducting such tests, inspections, and sampling as the Department may deem necessary; using a camera, sound recording, or other documentary type equipment for field activities; and verifying the data submitted to the Department by the Participant hereunder. Prior to conducting remediation activities, the Participant shall provide a minimum of 72 hours' notice to the Department to allow observation of Site activities and to allow the Department's authorized representatives to collect split samples, at the Department's discretion. The Participant shall permit the Department's authorized representatives to inspect and copy all records, files, photographs, documents, and other writings, including all sampling and monitoring data, which pertain to this Agreement and over which the Participant exercises authority.

X. Deliverables and Submittal Schedule

A. Final Voluntary Remediation Work Plan

In accordance with 20.6.3.400 NMAC, the Participant shall submit to the Department a proposed final voluntary remediation work plan, detailing investigation and remediation activities to be undertaken to achieve the performance standards described in Section VIII of this Agreement. At a minimum, the final work plan must include the elements listed in 20.6.3.400.B NMAC.

Submittal Schedule:

The proposed final work plan shall be submitted by the Participant no later than 60 days after this Agreement has been signed.

If the work plan is to be prepared in phases, the work plan for the first phase shall be submitted no later than 60 days after this Agreement has been signed. Following completion, to the Department's satisfaction, of the work which is the subject of the final work plan for the first phase, the Department may require submission of one or more proposed final work plans for subsequent phases.

Department Review:

The secretary or his designee shall review and approve, approve with conditions, or disapprove a proposed final work plan within 45 days of receipt. Written notice shall be made of any conditions or deficiencies. If the secretary or his designee disapproves a final work plan, the Participant may be granted an opportunity to submit a revised version, as determined by the secretary or his designee.

Modification of Voluntary Remediation Work Plan:

The approved final voluntary remediation work plan may be modified at the request of the Participant and/or the Department, with both parties' approval, in accordance with 20.6.3.400.D NMAC.

B. Periodic Status Reports

The Participant shall submit periodic status reports, which detail activities completed for the reporting period and those planned for the upcoming reporting period, to the Department for the duration of this Agreement. The status report shall identify any proposed variances to the approved work plan and describe interim progress on implementation of the work plan, including analytical results of any sampling, water level measurements, Site maps or photos, as appropriate.

Submittal Schedule:

Periodic status reports are not required.

C. Voluntary Remediation Completion Report

In accordance with 20.6.3.500.B NMAC, following the completion of Site voluntary remediation activities, the Participant shall demonstrate to the Department that Site conditions meet the applicable standards specified in Section VIII of this Agreement by submitting to the Department a voluntary remediation completion report. The content of the completion report is detailed in 20.6.3.500.B NMAC. The report shall be submitted to the Department with the legal description of the affected property, and with an Affidavit of Completion of Voluntary Remediation signed by the Participant that indicates that remediation is complete, in accordance with this Agreement and applicable regulations and guidance.

Submittal Schedule:

The voluntary remediation completion report shall be submitted to the Department within 90 days following completion of voluntary remediation activities.

Department Review:

The Department shall review and determine the sufficiency of a completion report within 45 days of receipt. If the secretary or his designee does not approve the completion report, the secretary or his designee shall either issue a finding that the Participant is not in compliance with the Agreement and terminate the Agreement, or advise the Participant in writing of data gaps in the report. The Participant shall correct any identified data gaps and resubmit the completion report within 30 days of receipt of notice of data gaps.

XI. Certificate of Completion

If the secretary or his designee approves the voluntary remediation completion report, the secretary or his designee will issue either a Certificate of Completion or a Conditional Certificate of Completion, as appropriate, pursuant to Section 74-4G-7 NMSA 1978 and 20.6.3.500.B NMAC. If a Conditional Certificate of Completion is issued, the Department shall conduct audits to ensure that all engineering controls, remediation systems, post-closure care, and affirmations of future non-residential land use are being maintained appropriately. These audits shall be performed at least every other year for the first 10 years following the issuance of the Conditional Certificate of Completion, and every five years thereafter. If, during the course of such an audit, the Department finds that any of the monitoring requirements, engineering controls, remediation systems, post-closure care, or affirmations of future non-residential land use are not being properly maintained such that the performance standards described in Section VIII of this Agreement are no longer being met, the Department may revoke the Conditional Certificate of Completion and initiate an enforcement action.

No Certificate of Completion or Conditional Certificate of Completion shall be issued to a Participant who has not paid invoiced oversight costs in full to the Department.

XII. Covenant Not to Sue

Pursuant to Section 74-4G-8 NMSA 1978 and 20.6.3.600 NMAC, after the secretary or his designee issues the Certificate of Completion or Conditional Certificate of Completion, the secretary or his designee shall provide a covenant not to sue to a purchaser or prospective purchaser of the Site that did not contribute to the Site contamination, for any direct liability, including future liability, for claims based upon the contamination covered by the Agreement and over which the Department has authority. Except as may be provided under federal law or as may be agreed to by a federal government entity, the covenant not to sue shall not release or otherwise apply to claims by the federal government for claims based on federal law. Except as may be agreed to by another department or agency of the state, the covenant not to sue shall not release or otherwise apply to claims of any other office, department, or agency of the state. Except as may be agreed to by a third party, the covenant not to sue shall not release or otherwise affect a person's liability to third parties.

XIII. Dispute Resolution

This section shall apply to any dispute arising under any section of this Agreement, unless specifically excepted. Dispute resolution shall be conducted in accordance with 20.6.3.300.I NMAC).

XIV. Reservation of Rights

The Department and Participant reserve all rights and defenses they may have pursuant to any available legal authority unless expressly waived herein. The Department expressly reserves the right to take any action, including any enforcement action, to address any release not covered by this Agreement, including any release that occurs after issuance of the Certificate of Completion or any release of a contaminant not covered by the voluntary remediation agreement. The secretary's covenant not to sue shall not apply to any such release.

Nothing herein is intended to release, discharge, or in any way affect any claims, causes of action or demands in law or equity which the parties may have against any person, firm, partnership or corporation not a party to this Agreement for any liability it may have arising out of, or relating in any way to the generation, storage, treatment, handling, transportation, release or disposal of any materials, hazardous substances, hazardous waste, contaminants or pollutants at, to, or from the Site. The parties to this Agreement expressly reserve all rights, claims, demands, and causes of action they have against any and all other persons and entities who are not parties to this Agreement, and as to each other for matters not covered hereby.

The Participant reserves the right to seek contribution, indemnity, or any other available remedy against any person other than the Department found to be responsible or liable for contribution, indemnity or otherwise for any amounts which have been or will be expended by the Participant in connection with the Site.

XV. Enforcement Shield

Pursuant to the provisions of 20.6.3.300.A NMAC, the secretary will not initiate any enforcement action, including an administrative or judicial action, against a Participant for the contamination or release thereof, or for the activity that results in the contamination or release thereof, if the contamination is the subject of an Agreement pursuant to 20.6.3 NMAC. However, this Section shall not be a bar to any enforcement action if the Agreement is not finalized, if the Agreement is terminated or rescinded, or if the Participant does not successfully initiate or implement the Agreement within a reasonable time under the schedules set forth in this Agreement and approved work plans.

XVI. Oversight Costs

The Participant agrees to reimburse the Department for all of its costs associated with oversight and implementation of this Agreement in accordance with 20.6.3.300.J NMAC. These costs shall include those described in 20.6.3.300.J NMAC, as well as long-term oversight performed by the Department, as described in 20.6.3.500.B(5) NMAC, if a Conditional Certificate of Completion is issued.

Oversight will be invoiced based on actual hours of staff oversight, at a variable rate beginning at \$90.00 per hour. The hourly rate is calculated and updated on November 1 of each year, following a 30 calendar day public comment period. Travel and per diem costs will be invoiced at state-designated rates. Sampling and analysis costs will be invoiced at actual cost plus indirect overhead rate.

The Department will track all costs to the Department for review and oversight activities related to the Site and provide quarterly (or more often at the discretion of the Department) invoices per this Agreement for said costs. The Participant shall pay these invoiced costs to the Department within 30 calendar days after the date that the Participant receives notice that these costs are due and owed. If payment is not made within 30 days, the Department may terminate this Agreement and bring an action to collect the amount owed and the costs of bringing the collection action. If the Department prevails in such collection action, the Participant shall pay the Department's reasonable attorneys' fees and costs incurred in the collection action.

In the event that this Agreement is terminated for any reason, the Participant agrees to reimburse the Department for all costs incurred or obligated by the Department before the date of notice of termination of the Agreement.

XVII. Notice of Bankruptcy

As soon as Participant has knowledge of its intention to file bankruptcy, or no later than seven days prior to the actual filing of a voluntary bankruptcy petition, Participant shall notify the Department of its intention to file a bankruptcy petition. In the case of an involuntary bankruptcy petition, Participant shall give notice to the Department as soon as it acquires knowledge of such petition.

XVIII. Indemnification

The Participant shall defend, indemnify, and hold harmless the Department and the State of New Mexico from all actions, proceedings, claims, demands, costs, damages, attorneys' fees, and all other liabilities and expenses of any kind from any source which may arise out of the performance of this Agreement, caused by the negligent act or failure to act of the Participant, its officers, employees, servants, subcontractors or agents, or if caused by the actions of any client of the Participant resulting in injury or damage to persons or property during the time when the Participant or any officer, agent, employee, servant or subcontractor thereof has or is performing services pursuant to this Agreement.

XIX. Effective Date and Subsequent Modification

The Agreement shall become final and effective upon being signed by both the secretary or his designee and the Participant. The effective date of the Agreement shall be the later date of signature by either the secretary or his designee or the Participant. This Agreement may be amended only by mutual agreement of the Department and the Participant. Amendments shall be in writing and shall be effective upon being signed by both the secretary or his designee and the Participant.

XX. Termination

As provided for in 20.6.3.300.H NMAC, if an Agreement is not reached between an applicant and the secretary or his designee on or before the 30th calendar day after the secretary or his designee determines an applicant to be eligible pursuant 20.6.3.200 and 20.6.3.300 NMAC, the applicant or the secretary or his designee may withdraw from the negotiations. The Participant may terminate the voluntary remediation Agreement upon 60 calendar days' written notice via certified mail, return receipt requested to the Department. The secretary or his designee may terminate this Agreement upon finding that the Participant is not in compliance with this Agreement. Notice of termination will be made to the Participant via certified mail, return receipt requested, and facts supporting the rationale for termination shall be set forth in the notification. The Department's costs incurred or obligated before the date the notice of termination is received are recoverable by the Department under the Agreement if the Agreement is terminated.

XXI. Complete Agreement

This Agreement contains the entire Agreement of the parties.

XXII. Applicable Law

This Agreement shall be governed by and construed in accordance with the laws of the State of New Mexico.

The provisions of this Agreement shall be satisfied when the Department gives the Participant written notice in the form of a Certificate of Completion that the Participant has demonstrated to the secretary's satisfaction that the terms of this Agreement have been completed, including the selection and implementation of a remedial action, when appropriate.

Nothing in this Agreement shall restrict the State of New Mexico from seeking other appropriate relief to protect human health or the environment from contamination at or from this Site if not remediated in accordance with this Agreement.

DRAFT

Signatures

Participant(s):

By: _____
(Signature of authorized representative)

Name: _____
(Print or type)

Date: _____

New Mexico Environment Department:

By: _____
(Secretary or designee)

Name: _____
(Print or type)

Date: _____

Enclosures: Exhibit 1: Legal Description of Property
 Exhibit 2: Preliminary Work Plan

NEW MEXICO ENVIRONMENT DEPARTMENT
VOLUNTARY REMEDIATION AGREEMENT

EXHIBIT 1

Legal Description of Property

Firestone Store #44W2
VRP Site No. 53221003

The site is a 0.3053 acre tract, more or less, located at 701 Central Avenue NW in Albuquerque in Bernalillo County, New Mexico. The 0.3053 acre site is more particularly described as follows: LT 13 BL 14 K M T ADD LOT 13 TO 16 BL K 14. A map of the site is included on the following page.



Source(s):
 Aerial – BERNCO website, dated 2020
 Monitoring Wells and UST - BBJ Group, 2021

Legend

- Monitoring Well
- Monitoring Well,
Plugged and Abandoned
- Closed-in-place Used Oil UST
- Site Boundary

Figure 2
Site Plan
 VRP Preliminary Work Plan,
 701 Central Ave NW,
 Albuquerque, New Mexico

NEW MEXICO ENVIRONMENT DEPARTMENT
VOLUNTARY REMEDIATION AGREEMENT

EXHIBIT 2

Preliminary Voluntary Remediation Work Plan

Firestone Store #44W2
VRP Site No. 53221003

New Mexico Environment Department Voluntary Remediation Program Preliminary Work Plan

**Former Firestone Store No. 44W2
701 Central Avenue NW
ALBUQUERQUE, BERNALILLO COUNTY,
NEW MEXICO**

Prepared for:

Presbyterian Healthcare Services
1011 Coal Avenue SE
Albuquerque, New Mexico 87106

And

701 Central, LLC
201 Coal Avenue SW
Albuquerque, New Mexico 87102

Prepared by:

INTERA Incorporated
2440 Louisiana Boulevard NE, Suite 700
Albuquerque, NM 87110



March 23, 2022

TABLE OF CONTENTS

List of Figures.....	ii
Appendices.....	ii
List of Acronyms	iii
1.0 INTRODUCTION.....	1
2.0 SITE BACKGROUND.....	2
2.1 Location and General Description	3
2.2 Regional Geology and Hydrology	3
2.3 History and Land Use	5
2.3.1 Adjacent Property Land Use.....	5
2.4 Ownership and Access.....	5
2.5 Previous Investigations	6
2.5.1 PSTB Corrective Action (1995 to present).....	6
2.5.2 2021 Phase I ESA	7
2.6 Suspected/Known Contaminants of Concern	7
3.0 PROPOSED PERFORMANCE STANDARD.....	8
3.1 Method 2 Assessment for Groundwater	8
3.2 Method 2 Assessment for Soils.....	9
3.3 Method 2 Assessment for Soil Vapor	9
4.0 PROPOSED SAMPLING AND ANALYSIS ACTIVITIES.....	9
4.1 Geophysical Survey	10
4.2 ACBM and LBP Survey of Site Building.....	10
4.3 Soil Characterization and Disposal During Construction.....	10
5.0 PROPOSED REMEDIATION ACTIVITIES.....	11
5.1 Removal of Boiler.....	11
5.2 Removal of PCS.....	11
5.3 Installation of Vapor Barrier.....	11
5.4 Immobilization/Containment of ACBM and LBP Materials.....	11
6.0 DISCUSSION OF HOW PROPOSED ACTIVITIES WILL MEET THE VRP PERFORMANCE STANDARD.....	12
6.1 VRP Performance Standard Objective 1.....	12
6.2 VRP Performance Standard Objective 2.....	12
6.3 VRP Performance Standard Objective 3.....	13
6.4 VRP Performance Standard Objective 4.....	14

7.0	PROJECT SCHEDULE.....	14
8.0	REFERENCES.....	15

LIST OF FIGURES

Figure 1	Site Location
Figure 2	Site Map

APPENDICES

Appendix A	Legal Description
Appendix B	Geophysical Survey Report, Relic Geophysical Service
Appendix C	Asbestos/Lead-Based Paint Survey Report, DC Environmental, Inc.
Appendix D	Petroleum-Contaminated Soil (PCS) Contingency Plan

LIST OF ACRONYMS

µg/L	micrograms per liter
ABCWUA	Albuquerque Bernalillo County Water Utility Authority
ACBM	asbestos containing building material
amsl	above mean sea level
bgs	below ground surface
BSRO	Bridgestone Retail Operations, LLC
CERCLA	Comprehensive Environmental Response Compensation and Liability Act
CCOC	Conditional Certificate of Completion
CNS	Covenant Not to Sue
COA	City of Albuquerque
COPC	contaminant of potential concern
CVOC	chlorinated volatile organic compound
CY	cubic yard
ft	feet (foot)
ft ²	square feet
LBP	lead-based paint
LUST	leaking underground storage tank
LNAPL	light non-aqueous phase liquid
NMAC	New Mexico Administrative Code
NMED	New Mexico Environment Department
NMWQCC	New Mexico Water Quality Control Commission
PCS	petroleum-contaminated soil
PSTB	Petroleum Storage Tank Bureau
PID	photoionization detector
ppm	parts per million
RECs	recognized environmental conditions
S&A	sampling and analysis
SVOCs	semi-volatile organic compounds
SSLs	Soil Screening Levels
TCE	trichloroethylene
USTs	underground storage tanks
VOCs	volatile organic compounds
VRP	Voluntary Remediation Program

1.0 INTRODUCTION

This Preliminary Voluntary Remediation Work Plan summarizes the results of environmental investigation activities completed to date for the former Firestone Store #44W2 (Site) and provides additional recommendations for Site remediation activities necessary to achieve a Conditional Certificate of Completion (CCOC) as part of the New Mexico Environment Department (NMED) Voluntary Remediation Program (VRP). Presbyterian Healthcare Services (Presbyterian) is preparing to sell the Site for redevelopment, and 701 Central, LLC will purchase the property for the purposes of redevelopment and is seeking a Covenant Not to Sue (CNS).

The Site, located at 701 Central Avenue (Ave) NW, consists of a 0.31-acre parcel located at the northwest corner of the intersection of Central Ave and 7th Street (St) (**Figures 1 and 2**). Commercial buildings border the Site to the west, north, south and southeast and an asphalt paved parking lot borders the Site to the east (**Figure 2**). The Site is currently developed with a one-story commercial building (with loft area) that is approximately 8,800 square feet (ft²) with the remainder of the Site developed with an asphalt/concrete parking lot. The Site was developed and operated as an automotive repair facility since the 1930s and is currently leased for conducting light automobile repair (e.g., historical automobile restoration). It appears the Site also potentially operated as a filling station between circa 1931 to circa 1957. Four underground storage tanks (USTs) associated with the former gasoline filling station are depicted in the southeast corner of the property in the 1931, 1942, and 1957 Sanborn Fire Insurance Maps.

As a result of the Site's former automotive repair and gasoline filling operations, the Site is listed as an NMED Petroleum Storage Tank Bureau (PSTB) leaking underground storage tank (LUST) facility (Facility ID # 28045; Release ID # 2845). Corrective action at the Site is being conducted by the responsible party, Bridgestone Retail Operations, LLC (BSRO), and consists of groundwater monitoring. Concerns still exist regarding the presence of dissolved manganese (Mn) in groundwater at concentrations which exceed the New Mexico Water Quality Control Commission (NMWQCC) Standards and the potential presence of benzo(a)pyrene in groundwater at concentrations which exceed the NMWQCC Standards. Dissolved iron is not included because exceedances of dissolved iron have not been observed historically. As a result, long-term groundwater monitoring activities may be required at the Site to continue to assess Site environmental impact to surrounding groundwater and will be BSRO's obligation to continue all NMED PSTB regulatory activities. Residual petroleum contamination likely exists in shallow vadose zone soils and may be remobilized if groundwater levels continue to rise due to increase reliance on surface water supplies for the City of Albuquerque (COA) public water supply. Limited excavation activities are planned at the Site during redevelopment; therefore, the potential to encounter residual petroleum-contaminated soil (PCS) is a concern. A PCS

contingency plan is required to address PCS characterization and disposal if encountered during Site redevelopment.

Potentially contaminated soil vapor is also a concern due to historical Site uses and the fact that the Site is located within 600 feet of the Fruit Avenue Plume Superfund Site groundwater restriction boundary and hydraulically downgradient/cross gradient of the West Central Avenue Plume; both known to be caused by releases of trichloroethylene (TCE) from various sites within downtown Albuquerque.

The intent of this Work Plan is to present information that demonstrates the Site (1) meets the criteria necessary to participate in the VRP, (2) that Presbyterian can attain a CCOC, and (3) 701 Central, LLC can attain a CNS once the proposed sampling and analysis and remediation activities are completed. Investigation into the presence or absence of the former USTs and vapor intrusion mitigation will be conducted under the VRP. Groundwater contamination is considered “background” with respect to the VRP because impacts to groundwater were caused by the former owner/operator and groundwater monitoring will continue by the responsible party, BSRO, under the PSTB CAF. Long-term monitoring activities include groundwater sampling which will be overseen by PSTB and will be the responsibility of BSRO. Additionally, potential PCS removal during construction/redevelopment (Section 4.3).

2.0 SITE BACKGROUND

The following Section provides a summary of Site location, general characteristics, and physical setting; current and former land use and ownership; and previous environmental investigations. Much of the information provided is based on our review of the following reports:

- *Phase I Environmental Site Assessment (ESA), Firestone Complete Auto Care Facility, 701 Central Avenue NW, Albuquerque, Bernalillo County, New Mexico 87102.* Completed for Two Guys Partners, LLC by Saguaro Environmental Management, Inc. dated August 11, 2020.
- *Phase I Environmental Site Assessment (ESA), Former Firestone Complete Auto Care Facility, 701 Central Avenue NW, Albuquerque, Bernalillo County, New Mexico 87102.* Completed for Presbyterian Health Care Services by Saguaro Environmental Management, Inc. dated May 21, 2021.
- *On-Site Investigation Report Bridgestone/Firestone, Inc. Store #44W2, Albuquerque, New Mexico.* Completed for Bridgestone/Firestone, Inc by Geraghty & Miller, Inc. dated June 1996.
- *Revised Groundwater Corrective Action Work Plan, Firestone Store No. 44W2, 701 Central Avenue NW, Albuquerque, NM.* Completed for Mr. Michael Boulay, New Mexico Environment Department (NMED) Petroleum Storage Tank Bureau (PSTB) by BBJ Group dated February 27, 2019.

- *Quarterly Groundwater Monitoring Report – July 2019, Firestone Store No. 44W2, 701 Central Avenue NW, Albuquerque, NM.* Completed for Mr. Michael Boulay, NMED PSTB by BBJ Group dated September 27, 2019.
- *Quarterly Groundwater Monitoring Report – December 2019, Firestone Store No. 44W2, 701 Central Avenue NW, Albuquerque, NM.* Completed for Mr. Michael Boulay, NMED PSTB by BBJ Group dated January 16, 2020.
- *Quarterly Groundwater Monitoring Report – March 2020, Firestone Store No. 44W2, 701 Central Avenue NW, Albuquerque, NM.* Completed for Mr. Michael Boulay, NMED PSTB by BBJ Group dated April 3, 2020.
- *No Further Action Request and Groundwater Monitoring Report – January 2021, Firestone Store No. 44W2, 701 Central Avenue NW, Albuquerque, NM.* Completed for Mr. Michael Boulay, NMED PSTB by BBJ Group dated January 22, 2021.
- *Annual Groundwater Sampling Report for 2015 Final, Fruit Avenue Plume Superfund Site, Albuquerque, New Mexico.* Completed for United States Environmental Protection Agency (USEPA) Region 6 by CH2M, dated February 2016.
- *Annual Operation and Maintenance Report, January through December 2015, Fruit Avenue Plume Superfund Site, Long-term Remedial Action, Albuquerque, New Mexico.* Completed for USEPA Region 6 by CH2M, dated May 2016.

2.1 Location and General Description

The Site, as depicted on the “Albuquerque West” topographic quadrangle (USGS, 2020), lies at approximately 4,955 feet (ft) above mean sea level (amsl). The Rio Grande is located approximately 1.0 miles southwest of the Site. Surface topography of Site is generally level with regional topography trending upwards toward the east. The Site location is shown on **Figure 1**.

Current legal description information for the Site according to the Bernalillo’s County Tax Assessor’s office is described as Site Parcel No. 101405705845823705, LT 13 BL 14 K M T DD LOT 13 to 16 BLK 14. A copy of the County Tax Assessor’s legal description is provided in **Appendix A**.

Four (4) monitoring wells associated with the ongoing PSTB groundwater monitoring activities are present within the Site boundary (MW-4 and BF-1) or immediately adjacent to the Site (MW-1 and MW-2) (**Figure 2**). The most recent groundwater monitoring event was conducted by BBJ Group on behalf of BSRO in May 2020.

2.2 Regional Geology and Hydrology

The Site is located in the south-central portion of the Albuquerque Basin. This basin is one of the largest of the south-trending series of grabens that form the Rio Grande Drainage Basin, which was formed in response to the Rio Grande Rift. The Rio Grande Rift is a north- to south-trending, downdropped area extending for more than 600 miles. The rift is an area of crustal

extension originating in central Colorado and extending south through New Mexico to south of the Mexico/Texas border (Thorn et al., 1993).

The Albuquerque Basin is filled with up to 10,000 ft of clastic sediments. The Santa Fe Formation sediments fill the majority of the basin. The Tertiary and Quaternary Santa Fe Formation is composed of unconsolidated to loosely consolidated gravels, sands, silts, and clays. The thickness of this unit ranges from 2,400 ft on the basin margins to 14,000 ft along the axis of the basin. In the vicinity of the Site, the thickness of this formation is on the order of 4,700 ft. The Santa Fe Group is overlain by Quaternary sediments, which have a similar facies distribution. These post-Santa Fe deposits are alluvial fan and floodplain deposits that are up to 200 ft thick (Thorn et al., 1993).

The Santa Fe Group and post-Santa Fe deposits are the principal water bearing units in the vicinity of the Site and are hydraulically connected (U.S. Army Corps of Engineers, 1979; Thorn et al., 1993). However, the Albuquerque Basin aquifer is anisotropic laterally and vertically due to spatial variations in the lithology of these two water-bearing units (Chamberlin et al., 1992). Clay layers 12 to 15 ft thick are commonly observed in the alluvium of the Albuquerque Basin; these clay layers restrict vertical movement of water and may locally limit hydraulic interconnection between the shallow Quaternary aquifer and the Santa Fe Group aquifer. As a result of spatial variations in lithology, the hydraulic transmissivity of the Albuquerque aquifer varies tremendously from less than 10 to 80,000 ft²/day. The hydraulic conductivity of the upper part of the Santa Fe Group varies also but is estimated to be approximately 20 ft per day, average in the vicinity of the Site (Thorn et al., 1993).

The water table configuration in the Albuquerque area has changed considerably over time due to population growth and the resulting increases in groundwater pumping and use. Groundwater flow in the vicinity of the Site before large-scale groundwater development is thought to have been to the southwest and this condition existed at least into the mid- to late-1930s (Thorn et al., 1993). Groundwater elevation contours representing 1960–1961 conditions in the Albuquerque area show a general regional southwesterly flow direction on the east side of the Rio Grande (Bjorklund and Maxwell, 1961).

Based on observations of groundwater monitoring wells installed at the Site, depth to groundwater at the Site has ranged from the current water level of approximately 17 ft below ground surface (bgs) to at least 28 ft bgs, the water level noted during 1996 investigation activities (Geraghty & Miller, Inc, 1996). Although it is difficult to discern the Site groundwater flow direction based on recent data (BBJ, 2021), it has been documented to have an easterly component (BBJ, 2019). COA-wide groundwater contours from 1992, and simulated 1994 hydraulic-head levels, reflect a large cone of depression developing on the east side of Albuquerque as a result of groundwater withdrawal (Kernodle et al., 1995). The cone of

depression appears to have influenced the groundwater flow direction beneath the Site and throughout downtown Albuquerque. The Albuquerque public water supply is from deep wells that are located in designated well fields throughout the COA (Thorn et al., 1993). Although the groundwater flow direction has historically been to the east during periods of heavy pumping of the underlying aquifer, now that this pumping has largely been stopped, the groundwater flow direction may shift to the pre-pumping direction which was largely to the south, southwest.

Site soils as described in soil boring logs from drilling conducted in 1996 consisted of silty sand underlain by fine- to coarse-grained sand with occasional gravels.

2.3 History and Land Use

Designated Site land use has been commercial. The Site was initially developed and operated as an automobile repair facility since the 1930s. A review of Sanborn Fire Insurance Maps also identified the Site as a filling station between at least 1931 and 1957 and identified four USTs located in the southeast corner of the property. Prior to the 1930s, the Site was identified in Sanborn Maps undeveloped (1902 to 1908), a temporary tabernacle (1913), and as having “photo tents” with canvas roofs (1919 to 1924) (Saguaro, 2021).

2.3.1 Adjacent Property Land Use

In general, the Site has historically been adjoined by the following (Saguaro, 2020):

- North – residences (1902 through 1942) and a multi-tenant building (1951 to present);
- East – undeveloped (1902 to 1908), Masonic Temple (1913 to 1967), parking lot (present);
- South – undeveloped (1902 to 1908), industrial operation (1913 to 1919), a gasoline filling station (1924 to 1967), and Tire and Automotive Service operations (1972 to present); and
- West – undeveloped (1902 to 1924), photography studio (1931 to 1977), miscellaneous businesses (e.g., law firm, therapy service) (1996 to present).

2.4 Ownership and Access

Based on the legal description for the Site (**Appendix A**), current registered ownership of LT 13 BL 14 K M T ADD LOT 13 TO 16 BL K 14 is Presbyterian Healthcare Services (Presbyterian).

Presbyterian Healthcare Services are moving forward with listing the Site for sale. Presbyterian is requesting that NMED provide a CCOC and Gellmore a CCNS for the Site once VRP activities are completed as outlined in Section 4.0 and Section 5.0 of this work plan.

2.5 Previous Investigations

The environmental history of the Site includes characterization and monitoring by BSRO as part of corrective action overseen by the NMED PSTB, these corrective action activities began 1995 and currently ongoing. A Phase I Environmental Site Assessment was completed in 2020 by Saguaro. Details regarding these Site investigation activities, corresponding analytical results, and any applicable regulatory directives are briefly summarized in the following subsections. Additional details regarding these investigations can be found in the corresponding original reports referenced herein.

2.5.1 PSTB Corrective Action (1995 to present)

Site monitoring and remediation efforts are ongoing under the regulatory jurisdiction of PSTB. In 1995, one, 350-gallon, used oil UST was closed in-place (**Figure 2**) at the Site. During closure of the former used oil UST, approximately 10 cubic yards (CY) of PCS was removed. Additional soil removal was not conducted because this UST is located approximately 2.5 ft below the concrete slab of the main service bay within the Site building. As a result of this release, further investigation was conducted in May 1996 and included advancing five soil borings and collection of soil samples and groundwater grab samples from three of the soil borings. Results of the May 1996 soil and groundwater sampling efforts confirmed a release had occurred, field screening of soil samples measured photoionization detector (PID) readings > 100 parts per million (ppm) and total naphthalenes were detected in one groundwater sample at a concentration in excess of the applicable NMWQCC Standard.

To further investigate impacts to groundwater, one monitoring well (BF-1) with a total depth of 40 ft bgs was installed in September 1996. Although contaminant concentrations in groundwater samples collected from BF-1 were below NMWQCC Standards during four monitoring events conducted in 1996 and 1997, measurable thickness of light non-aqueous phase liquids (LNAPL) was noted during the last two monitoring events in 1997. LNAPL fingerprinting identified the LNAPL as motor oil and/or hydraulic fluid.

In July 1999, additional investigation activities were completed and included the installation of four monitoring wells (MW-1 through MW-4) with total depths ranging from 34 to 35 ft bgs. A subsequent groundwater monitoring event confirmed the continued presence of LNAPL at BF-1 (0.67 ft) and groundwater samples collected from the newly installed monitoring wells did not contain volatile organic compounds (VOCs) or semi-volatile organic compounds (SVOCs) at concentrations that exceed the NMWQCC Standard.

Numerous groundwater monitoring events have been conducted and the PAH, benzo(a)pyrene, had been detected in groundwater samples collected from BF-1 and MW-1 at concentrations that exceeded the corresponding NMWQCC Standard of 0.2 micrograms per liter (µg/l). The most recent groundwater sampling events where exceedances were observed were conducted in 2000

(BF-1) and 2010 (MW-1). Although exceedance have not been noted since these events, the laboratory reporting limit during several monitoring events, including the most recent in 2019, was noted to be greater than the NMWQCC Standard; therefore, it could not be determined if benzo(a)pyrene was present in groundwater at concentration in excess of the NMWQCC Standard. Dissolved manganese has also been detected in groundwater samples at concentrations that exceed the respective NMWQCC Standard. The most recent dissolved manganese exceedance was noted during the December 2019 monitoring event, which corresponds to the last time analysis of dissolved manganese was completed.

Because the Albuquerque Bernalillo County Water Utility Authority (ABCWUA) relies more heavily on surface water for its municipal water supply and does less regional pumping, groundwater head levels have been rising with the City of Albuquerque for the last several years. The well screen at BF-1 is submerged (top of screen is below the water table) and the groundwater samples may not be representative of actual ground water concentrations at the near surface of the water table.

The most recent groundwater monitoring report was submitted in January 2021 to PSTB. The report included a request for No Further Action determination. The presence of dissolved manganese and benzo(a)pyrene in groundwater at concentrations which exceed their corresponding NMWQCC Standards does not support a No Further Action determination at the present time.

2.5.2 2021 Phase I ESA

A Phase I ESA was conducted for the Site in 2021 by Saguaro Environmental Management, Inc., in support of a potential buyer. The purpose of the Phase I ESA was to identify recognized environmental conditions (RECs) in connection with the Site, in satisfaction of the all appropriate inquiry requirement of the Comprehensive Environmental Response Compensation and Liability Act [CERCLA], through the following efforts: (1) Site reconnaissance; (2) research of pertinent environmental and other records; and (3) interviews with public officials and other persons with knowledge of the Site.

Per Phase I ESA inquiries, two RECs were identified. The confirmed on-Site release of petroleum products to soil and groundwater due to the historic Site use as an automotive filling and repair facility and the stained concrete floor and standing oil observed beneath the boiler (Saguaro, 2021).

2.6 Suspected/Known Contaminants of Concern

Based on both operational and environmental history of the Site and potential off-site trespassing plumes (vapor and groundwater), the following constituents are identified as site contaminants of potential concern (COPCs):

- Groundwater: VOCs, SVOCs, and dissolved iron and manganese
- Soil: total petroleum hydrocarbons (TPH) including gasoline range organics, diesel range organics, motor oil range organics, VOCs, and SVOCs
- Soil Vapor: total petroleum hydrocarbons (TPH) including gasoline range organics, diesel range organics, motor oil range organics, VOCs, and SVOCs

These COPCs were derived from evaluating historical Site analytical data with the applicable NMWQCC Human Health Standards defined in New Mexico Administrative Code (NMAC) 20.6.2.3.3103 (NMED, 2018) and New Mexico Soil Screening Levels (SSLs) defined in the NMED Risk Assessment Guidance for Site Investigation and Remediation Volume I Soil Screening Guidance for Human Health Risk Assessments (NMED, 2019). Other Site COPCs established for the Site include:

- Soil: TPH, VOCs, SVOCs
- Soil Vapor: VOCs, SVOCs
- Building Structures: asbestos containing building material (ACBM) and lead-based paint (LBP)

These COPCs are common contaminants associated with environmental release(s) of TPH, likely resulting from the operation of former auto repair and maintenance facilities at the Site, potential operation of a former filling station at the Site, and known off-site chlorinated volatile organic compound (CVOC) groundwater plumes.

3.0 PROPOSED PERFORMANCE STANDARD

Site compliance with the VRP Performance Standard, as defined by NMAC 20.6.3.10 (NMED, 2001), will be established through the completion of a Method 2 assessment for soil, groundwater, and soil vapor.

3.1 Method 2 Assessment for Groundwater

Previous Site investigation work has established the presence of a dissolved manganese contaminant plume and the potential presence of benzo(a)pyrene in groundwater below the Site. As such, this VRP work plan proposes groundwater monitoring be continued by BSRO (responsible party) as part of PSTB corrective action activities. How the proposed Site monitoring activities for groundwater will meet this performance standard is discussed further in Section 6.0.

3.2 Method 2 Assessment for Soils

Site investigation work conducted in 1996 suggests that shallow subsurface soils, may still contain residual TPH contamination (Geraghty & Miller, 1996) as documented by PID field screening results. Analytical laboratory results obtained from soil samples collected during investigation activities between 1996 and 1999 were noted as not exceeding applicable New Mexico soil screening levels (SSLs) (BBJ, 2021). Of particular concern for the redevelopment activities are construction worker exposure and the potential generation of regulated waste: execution of construction activities at the Site may result in excavation of and exposure to PCS.

During construction, the owner has opted to remove and segregate Site soils encountered as part of construction activities screened to contain VOCs in excess of 100 ppm (Section 4.3 below). One hundred (100) ppm represents the NMED TPH screening action level for soil.

Analytical results obtained from samples collected from segregated Site soil will be further evaluated against applicable (1) New Mexico soil screening levels (SSLs) as defined by the NMED Risk Assessment Guidance for Site Investigations and Remediation (NMED, 2021). How the Site characterization activities for soil will meet this performance standard is discussed further in Section 6.0.

3.3 Method 2 Assessment for Soil Vapor

Although COPCs for Site soil vapor have not been directly established for the Site because no representative soil vapor data have been collected, exposure to VOCs as a result of vapor intrusion remains a primary environmental concern for the Site due to historical operation of former auto repair and maintenance facilities at the Site, potential operation of a former filling station at the Site, and known off-site CVOC groundwater plumes. The primary concern with the presence of VOCs in soil vapor is its potential to adversely impact indoor air quality in the Site buildings. In lieu of collecting soil vapor data, the use of engineering controls (vapor barrier) will be implemented to ensure that indoor air vapor instruction screening levels are not exceeded. How the proposed Site remediation activities for soil vapor will meet this performance standard is discussed further in Section 6.0.

4.0 PROPOSED SAMPLING AND ANALYSIS ACTIVITIES

Three VRP sampling and analysis activities are being proposed for the Site to evaluate if the former USTs associated with the historic filling station have been removed and to identify if ACBM and LBP is present in Site buildings. Institutional and engineering controls will be implemented at the Site to mitigate any potential risk associated with soil and soil vapor and groundwater sampling will continue by the current responsible party as part of corrective actions with PSTB.

- **Sampling and Analysis Activity 1** – Ground penetrating radar survey
- **Sampling and Analysis Activity 2** – ACBM and LBP survey
- **Sampling and Analysis Activity 3** – Soil Characterization and Disposal During Construction

4.1 Geophysical Survey

Sanborn maps dated 1931, 1942, and 1957 depict four USTs located near the intersection of Central Ave and 7th St. A geophysical survey will be completed in the southeast corner of the property. The geophysical survey will focus on the southeast corner of the property to investigation if the four USTs are present.

A geophysical survey was conducted at the Site on June 15, 2021 by Relic Geophysical Service. The geophysical study did not indicate that buried USTs are present within the southeast corner of the Site (Relic, 2021). A complete copy of the Relic Geophysical Service Report for the Site is included in **Appendix B**.

4.2 ACBM and LBP Survey of Site Building

A Site inspection of all the building materials at the Site should be conducted to determine if asbestos and LBP sampling is necessary. The Site inspection should include a Site walk of the building, documentation of the inventory, determination what building materials should be sampled, and collection and analysis of asbestos and LBP samples.

DC Environmental (DCE) conducted an asbestos and LBP survey at the Site building on August 4, 2021. The asbestos and LBP survey determined that asbestos is present in roofing penetration mastic and that LBP is present within the beige paint in the upstairs storage room, white paint on the concrete in the Site building lobby, black and grey paint on the exterior concrete walls, yellow paint in the parking lot (on bollards and parking lot striping), blue paint in the shop, shop bathroom, lobby, and storage room, and red paint in the storage room and exterior concrete walls (DCE, 2021). A complete copy of the DCE asbestos and LBP survey report is included in **Appendix C**.

4.3 Soil Characterization and Disposal During Construction

Site investigation work suggests the Site may contain residual TPH and VOCs/SVOCs contamination (BBJ, 2021). This represents particular concern for the potential developer with respect to both construction worker exposure and the potential generation of PCS. To ensure proper handling and disposition of PCS is executed during Site redevelopment, INTERA developed a PCS Contingency Plan which outlines the approach to use to initially characterize

and dispose of PCS if PCS is encountered during Site redevelopment. The proposed PCS Contingency Plan is provided in **Appendix D**.

5.0 PROPOSED REMEDIATION ACTIVITIES

Presbyterian is proposing the following remediation activities be completed as part of VRP activities.

- **Remediation Activity 1** – Removal of boiler
- **Remediation Activity 2** – Removal of PCS
- **Remediation Activity 3** – Installation of vapor barrier
- **Remediation Activity 4** – Immobilization/Containment of ACBM and LBP Materials

5.1 Removal of Boiler

The inactive boiler was removed from the Site building during the Fall of 2021. Now that the boiler is no longer present, the boiler room may be cleaned (if deemed necessary by the vapor barrier contractor to assure adhesion) by pressure washing the floor, walls, and ceiling. The boiler room floor drain may be sealed with concrete following room cleaning (this will be evaluated by a plumber). The boiler room will be sealed by applying a vapor barrier to the walls and floor. The vapor barrier on the floor may be protected by adding a floor leveling system. The boiler room walls will be coated using a system to be determined by the vapor barrier contractor.

5.2 Removal of PCS

Residual TPH soil contamination may be present only in specific areas of the Site (below the asphalt parking lot). In these areas, residual PCS, if present, is anticipated to be quite shallow (less than 5 ft bgs) and will therefore be addressed upon excavation and removal of soils as part of the construction planning and oversight as detailed in Section 4.3 above.

5.3 Installation of Vapor Barrier

A vapor barrier will be installed and will consist of a Geo-Seal coating on top of the existing concrete slab. The vapor barrier will be either an epoxy coating or a spray-applied coating that will be protected by installing a floor leveling system over the newly installed vapor barrier.

5.4 Immobilization/Containment of ACBM and LBP Materials

ACBM and LBP are present in the Site building. A determination will need to be made as to whether asbestos and LBP abatement or encapsulation needs to occur for those building materials testing positive for the presence of asbestos and LBP. Any remaining asbestos and/or LBP will need to be documented, and a management plan will need to be developed governing how these materials should be handled.

Upon completion, results of VRP remediation activities will be provided to NMED as part of the final Voluntary Remediation Completion Report.

6.0 DISCUSSION OF HOW PROPOSED ACTIVITIES WILL MEET THE VRP PERFORMANCE STANDARD

Performance requirements for projects participating in the VRP program are described in NMAC 20.6.3.10. These performance standards involve four specific activities to meet VRP requirements: (1) identify the problem; (2) quantify the risk; (3) verify the need for remedial action; and (4) identify the remedy. Details regarding how already completed or currently proposed Site assessments provide sufficient information to support conclusions regarding these activities are discussed further in the subsections below.

6.1 VRP Performance Standard Objective 1

Performance Standard Objective 1 can be defined as identification of *“the source, nature and extent, migration pathways, and environmental fate and transport of contaminants in all environmental media present at the site (i.e., soil, groundwater, surface water, sediment, and/or air).”*

Characterization sampling and analysis efforts were performed at the Site between 1996 and 2021 for both soil and groundwater. Results of these efforts have identified the following:

- Nature of contamination – TPH, VOCs, SVOCs, and dissolved manganese
- Potential contaminant source - operation of former auto repair and maintenance facilities at the Site, potential operation of a former filling station at the Site, and known off-site CVOC groundwater plumes.
- Extent of contamination – Groundwater beneath the Site has been impacted and to a lesser extent soil. Monitored natural attenuation has resolved much of the groundwater contamination. Groundwater beneath the Site continues to contain elevated concentrations of dissolved manganese and it is unknown if elevated benzo(a)pyrene is presented. Relic PCS may still be present in specific areas of the Site.
- Migration pathways - leaching; particulate suspension in air and/or storm water/surface water
- Fate and transport of contaminated media - dermal contact, ingestion, and inhalation for both soil and groundwater pathways

6.2 VRP Performance Standard Objective 2

Performance Standard Objective 2 can be defined as quantification of *“the risk of harm posed by the site to human health, safety, and the environment.”*

Three environmental Site media have been identified as being potentially impacted by one or more COPCs: soil, groundwater, and soil vapor. For soil and groundwater, the relative degree of risk posed by exposure to these COPCs at the Site has been established by directly comparing Site COPC concentrations to applicable standards. Applicable standards used for this comparison include:

- Soils
 - NM SSLs (NMED, 2019)
- Groundwater
 - NMWQCC Standards (NMED, 2018)

Soil vapor samples have not been collected at the Site and the proposed VRP sampling and analysis activities do not include assessing soil vapor concentrations. Potential vapor intrusion issues will be mitigated using engineering controls (vapor intrusion barrier).

6.3 VRP Performance Standard Objective 3

Performance Standard Objective 3 can be defined as verification for *“the need to conduct remedial actions at the site to safeguard against such risks.”*

Analysis of Site soil data collected between 1996 and 1999 indicate that there is limited impact to soil based on PID field screening measurements. Remedial activities for soil are not anticipated for the Site. Presently, engineering controls are in place and the potential contaminated soil is capped by the asphalt paved parking lot and Site building. It is anticipated that redevelopment of the Site will include minimal disturbance of subsurface soil. The soil beneath the asphalt parking lot will be handled according to a PCS Contingency Plan (**Appendix D**). The potential presence of PCS will be documented through institutional controls and mitigated using engineering controls.

Analysis of Site groundwater data collected between 1996 and 2021 indicate the presence of a dissolved manganese plume beneath the Site and the potential presence of benzo(a)pyrene in groundwater. No groundwater remediation activities are proposed as part of the VRP completed by Presbyterian at the Site. Groundwater monitoring well be continued by BSRO as part of ongoing PSTB corrective action activities.

Soil vapor samples have not been collected at the Site and the proposed VRP sampling and analysis activities do not include assessing soil vapor concentrations. Potential vapor intrusion issues will be mitigated using engineering controls.

6.4 VRP Performance Standard Objective 4

Performance Standard Objective 4 can be defined as identification of “*the remedial action selection and design, if appropriate.*”

No soil remediation is proposed for the Site. The presence of potential soil contamination will be documented (institutional controls) and if future construction activities disturb soil, the PCS Contingency Plan will be followed (**Appendix D**). No groundwater remediation is proposed for the Site, continued monitoring of groundwater will performed by BSRO as part of PSTB correction action activities. Potential soil vapor issues will be handled as described in Sections 5.1 and 5.2, above.

7.0 PROJECT SCHEDULE

COMPLETION DATE	MILESTONE	
	VRP ACTIVITIES	REDEVELOPMENT (Subject to Change)
March 25, 2022	Submit Application and Preliminary VRP Work Plan	
April 30, 2022	Conditional VRP eligibility determination from NMED?	Finalize purchase agreement
June 15, 2022	Final VRP eligibility determination from NMED	
July 30, 2022	Execute Voluntary Remediation Agreement (VRA)	
November 30, 2022	<u>Complete VRP Remediation Activities 2, 3 and 4 from VRP Work Plan:</u> Remove PCS (if applicable) Install vapor barrier Abate ACBM/LBP	
December 31, 2022	Submit VRP Completion Report	
January 31, 2023	Obtain Conditional Certificate of Completion (CCOC) from NMED	
February 15, 2023	Obtain Covenant Not to Sue (CCNS) from NMED	

* - Groundwater monitoring activities will be conducted as required and approved by NMED PSTB.

8.0 REFERENCES

- BBJ, 2019. Quarterly Groundwater Monitoring Report – July 2019, Firestone Store No. 44W2, 701 Central Avenue NW, Albuquerque, NM. Completed for Mr. Michael Boulay, NMED PSTB by BBJ Group dated September 27, 2019.
- BBJ, 2021. No Further Action Request and Groundwater Monitoring Report – January 2021, Firestone Store No. 44W2, 701 Central Avenue NW, Albuquerque, NM. Completed for Mr. Michael Boulay, NMED PSTB by BBJ Group dated January 22, 2021.
- Bjorklund, L. J., and B. W. Maxwell. 1961. Availability of Groundwater in the Albuquerque Area, Bernalillo and Sandoval Counties, New Mexico, New Mexico State Engineer Technical Report 21.
- Chamberlin, R. M., J. M. Gillentine, C. S. Haase, J. W. Hawley, R. P. Lozinsky, and P. S. Mozley. 1992. Hydrogeologic framework of the northern Albuquerque Basin. New Mexico Bureau of Mines and Mineral Resources Open-File Report 387. Socorro, New Mexico New Mexico Institute of Mining and Technology. September.
- DC Environmental (DCE). 2021. Asbestos and Lead-Based Paint Survey, Firestone Auto Center, 701 Central Avenue NW, Albuquerque, New Mexico. Prepared for Presbyterian Healthcare Services. August 12.
- Kernodle et al. (J. M. Kernodle, D. P. McAda, and C. R. Thorn), 1995. Simulation of Ground-Water Flow in the Albuquerque Basin, Central New Mexico, 1901–1994, with Projections to 2020, U.S. Geological Survey Water-Resources Investigations Report 94-4251.
- Geraghty & Miller, Inc, 1996. On-Site Investigation Report, Bridgestone Firestone, Inc. Store #44W2/Property Number 100814. Albuquerque, NM. June 1996
- New Mexico Environment Department (NMED). 2001. NMAC 20.6.3, Voluntary Remediation. November 27. <http://www.nmcpr.state.nm.us/nmac/parts/title20/20.006.0003.htm>, accessed March 9, 2014
- . 2018. NMAC 20.6.2, Ground and Surface Water Protection. Dec 1, 1995. Amended December 21.
- . 2019. NMED Risk Assessment Guidance for Site Investigation and Remediation Volume I Soil Screening Guidance for Human Health Risk Assessments. February.
- Relic Geophysical Service (Relic). 2021. Geophysical Survey for Abandoned USTs. 701 Central Avenue SE, Albuquerque, NM. Prepared for INTERA, Inc. June.

Saguaro, 2020. Phase I Environmental Site Assessment (ESA), Firestone Complete Auto Care Facility, 701 Central Avenue NW, Albuquerque, Bernalillo County, New Mexico 87102. Completed for Two Guys Partners, LLC by Saguaro Environmental Management, Inc. dated August 11, 2020.

Saguaro, 2021. Phase I Environmental Site Assessment (ESA), Former Firestone Complete Auto Care Facility, 701 Central Avenue NW, Albuquerque, Bernalillo County, New Mexico 87102. Completed for Presbyterian Health Care Services by Saguaro Environmental Management, Inc. dated May 21, 2021.

Thorn, C. R., D. P. McAda, and J. M. Kernodle. 1993. "Geohydrologic framework and hydrologic conditions in the Albuquerque Basin, Central NM, U.S.," Water-Resources Investigation Report 93-4149. Socorro, New Mexico: U.S. Geological Survey.

U.S. Army Corps of Engineers, 1979. "Albuquerque Greater Urban Area", Urban Studies Program, Water Supply, Appendix III.

Figures



Figure 1
Site Location
 VRP Preliminary Work Plan,
 701 Central Ave NW,
 Albuquerque, New Mexico



Source(s):
 Topo - <https://basemap.nationalmap.gov/arcgis/services>



Source(s):
 Aerial – BERNCO website, dated 2020
 Monitoring Wells and UST - BBJ Group, 2021

Legend

- Monitoring Well
- Monitoring Well,
Plugged and Abandoned
- Closed-in-place Used Oil UST
- Site Boundary

Figure 2
Site Plan
 VRP Preliminary Work Plan,
 701 Central Ave NW,
 Albuquerque, New Mexico

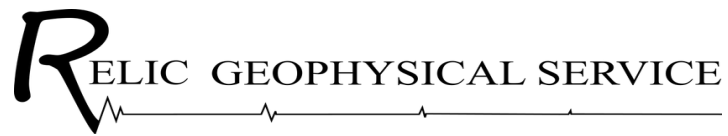
Appendix A
Legal Description

APPLICATION EXHIBIT “A”
STATE OF NEW MEXICO ENVIRONMENT DEPARTMENT
VOLUNTARY REMEDIATION PROGRAM
LEGAL DESCRIPTION OF THE TRACT OF LAND FOR WHICH VOLUNTARY
REMEDATION IS PLANNED

I. Tract of Land Comprising Site.

The site is a 0.3053 acre tract, more or less, located at 701 Central Avenue NW in Albuquerque in Bernalillo County, New Mexico. Said 0.3053 acre voluntary remediation site is more particularly described as follows: LT 13 BL 14 K M T ADD LOT 13 TO 16 BL K 14

Appendix B
Geophysical Survey Report
Relic Geophysical Service



1204 Cassady, Socorro NM, 87801 (575) 404-6266

**Geophysical Survey for Abandoned USTs
701 Central Avenue SE
Albuquerque, NM**

Prepared for:

INTERA Inc.
6000 Uptown Blvd. NE
Suite 220
Albuquerque, NM 87110

Byron Sessions

June 2021

Introduction

A geophysical survey was conducted at 701 Central Ave. Albuquerque, NM, located at the NW corner of 7th St. and Central Ave. The objective of the survey was to determine if abandoned underground storage tanks (USTs) remained on the property from prior land use. The property has previously been used as a fueling station and auto repair shop. A relic fuel island still remains under the current asphalt surface and all other related features have been removed leaving a flat open surface. The only obstruction is a small 8'x10' area that is bounded by 2 large parking curb stops and 2 bollards.

The survey was conducted on 15 June 2021. Labor, instrumentation, and technical expertise for the survey was provided by Relic Geophysical Service of Socorro, NM. Guidance and coordination was provided by INTERA Inc. of Albuquerque, NM.

Methods

A control grid for acquiring parallel lines of data was established around the perimeter of the property. Additional lines were added to the east side, beyond the property boundary, to bolster the data in the area of greatest probability of UST location.

An initial survey was conducted using a Geonics EM61 metal detector with a 1 meter antenna set. The EM61 is a time domain electromagnetic instrument capable of detecting concentrations of buried metal, such as a UST, to a depth of approximately 10 ft. The EM61 data were acquired every 0.65 feet along parallel north-south lines separated by 4 ft.

A second survey was performed with a Sensors & Software 250 MHz ground penetrating radar (GPR) system. GPR data were acquired every 0.16 ft. along parallel north-south lines separated by 2 ft. Additional data were also acquired in select areas where the USTs were suspected to be. These additional lines were parallel east-west lines separated by 2 ft.

A Schonstedt magnetic locator was also deployed for initial qualitative screening of the property.

Data from the EM61 and GPR were recorded by data loggers intrinsic to each system. The EM61 data was post processed using Geosoft Oasis Montage mapping package. The GPR data was post processed using Sensors & Software Ekko_Project.

Results

An initial sweep of the property was conducted using the Schonstedt locator. A possible relic fueling island was located on the southern end of the property and cracks in the pavement consistent with the shape of a fueling island were also present. The interior of the property was noted as having an elevated response. The east side sidewalk was checked for metal reinforcement and found to be free of a metallic response.

The EM61 response is shown in figure 1. Both surface and subsurface metal can generate a response above background (blue). An abandoned UST is expected to generate a very strong response (red to pink) on this color scale. A large area of strong signal is shown situated in the middle third of the figure. This high response area correlates to a high frequency jittering signal from the GPR (figure 2). The “jitter” is from the radio signal reflecting off a dense target in a less dense matrix at a regular interval, like rebar in a concrete slab. This signal is evident from 18 ft east to 40 ft east and also only present from 0 ft north to 58 ft north on the north-south lines in figure 1.

Line 26 ft east is shown in figure 2 as an example of the jitter signal. The rest of the area on the map is low response with the exception of some relic utilities running east-west at 50 north, a second buried utility running diagonal from one area of the building to another in the northwest corner, a monitoring well at 70 north, 28 east, and to base receptacles for bollards on the east side. These are noted in figure 8.

In figure 1, the EM61 response in the suspected location of the USTs is anomalously low for the site. The low response east side is a good indicator of virgin fill brought in from an outside source. It is devoid of the legacy accumulation of bits of metal trash (bottle caps, nuts, bolts, grinding dust) that is seen on the west and north side. The east-west GPR lines show this difference (figure 3 & 4) and suggest the anomalous blue east side is a clay rich fill. The radio signal emitted by the GPR loses strength quickly in clay soils and buried reflectors have a weaker response. Figure 3 also shows a sloped disturbance at depth (46 ft. and 58ft.) that is a good indicator of a previous excavation.

Figure 5 shows GPR line 16 east that does not cross the reinforced slab but does cross the relic utilities at 50 ft. north and 70 ft north. The 50 ft. north utility crossing is wide and has indicators of multiple buried lines. Figure 6 shows a GPR line traversing the reinforced slab but has no strong reflectors that would indicate a buried UST. Figure 7 summarizes example GPR lines.

Conclusion

The Sanborn maps indicated 4 USTs existing on the east side of the property. The EM61 survey did not indicate any evidence of these USTs presently existing in the suspected area of the property or anywhere else. The low response area is suggestive of activity that is consistent with an excavation and refill with non native material. In particular, the southern end shows deeper (4+ ft.) disturbances in the soil that indicate a more substantial excavation.

The Geophysical survey at 701 Central Avenue detected no subsurface features consistent with an abandoned UST and indicates an excavation in the suspected area of the relic USTs.

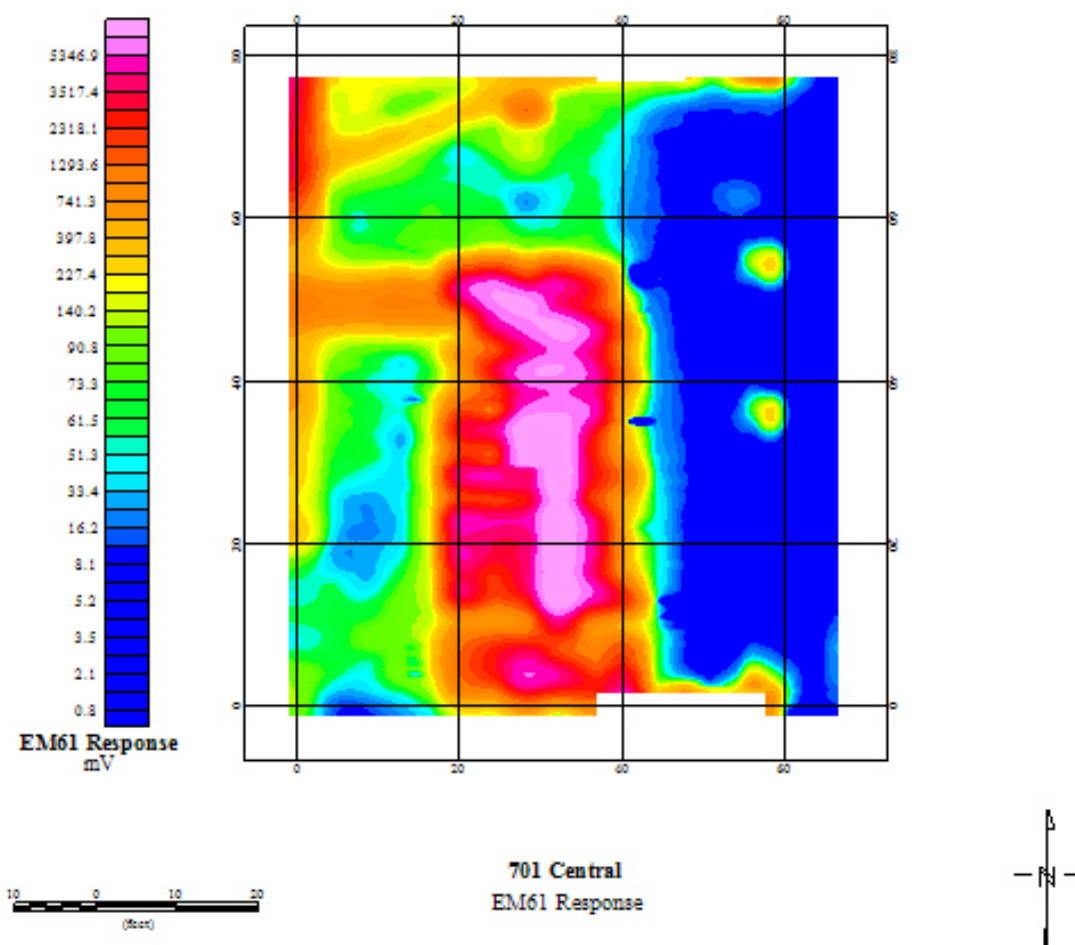


Figure 1

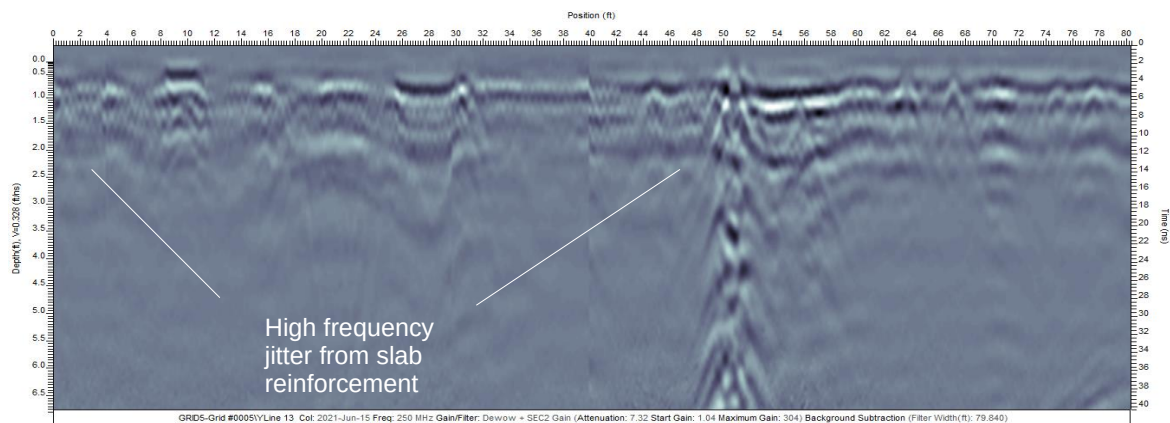


Figure 2

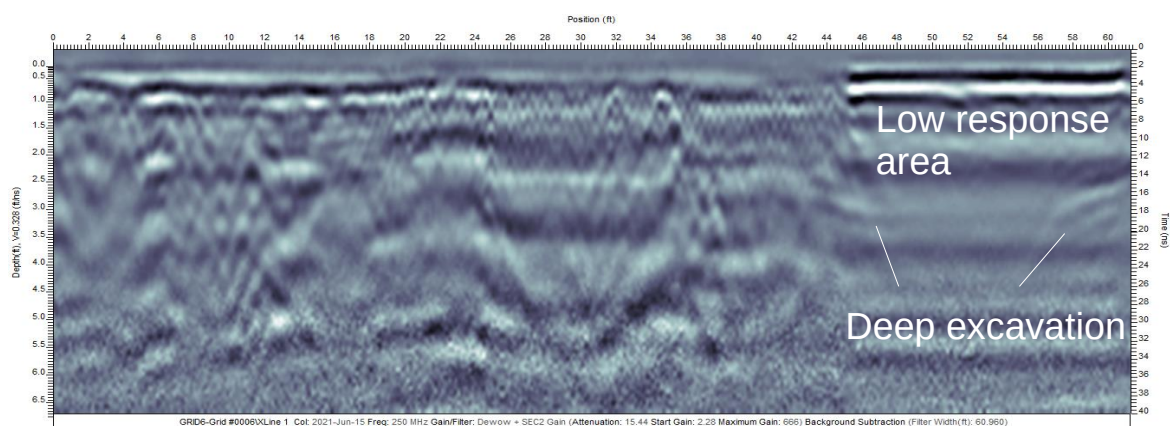


Figure 3

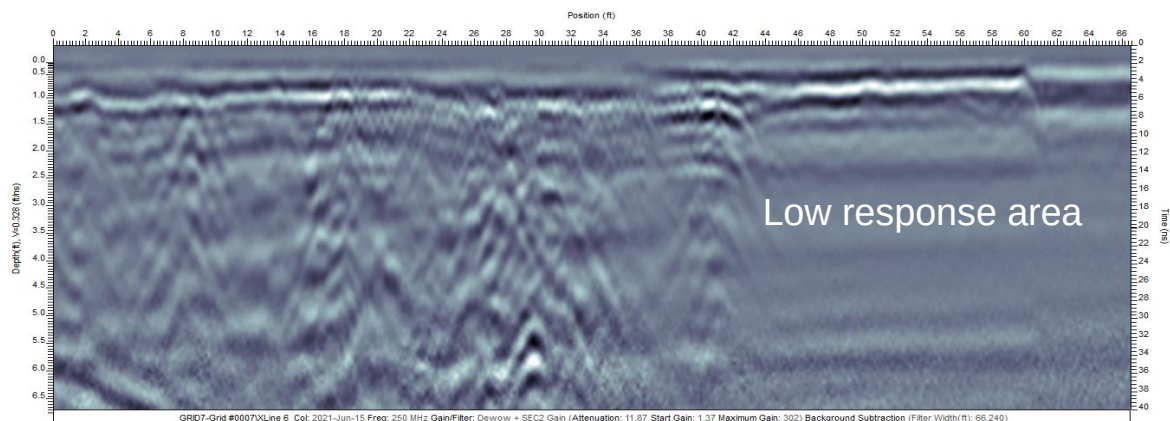


Figure 4

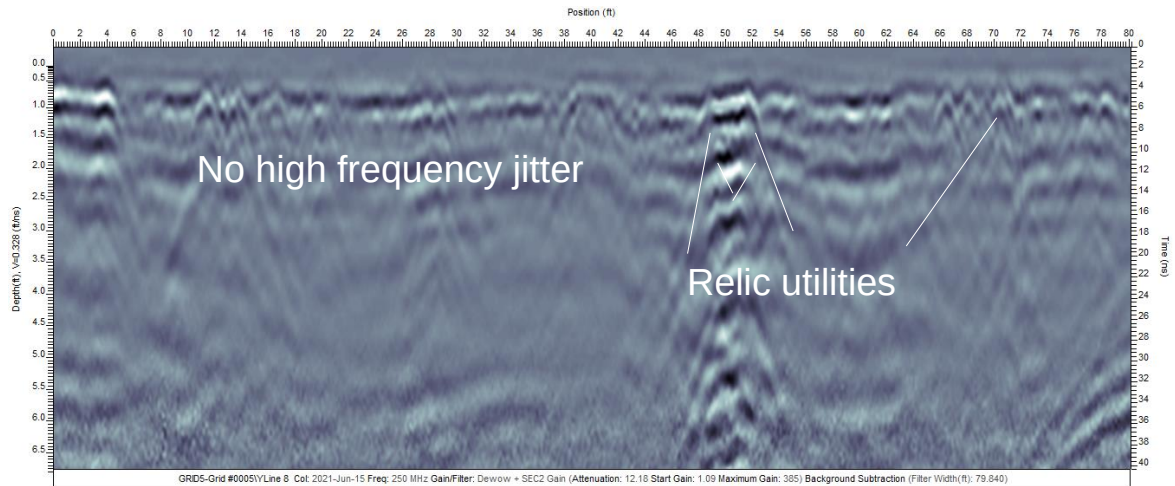


Figure 5

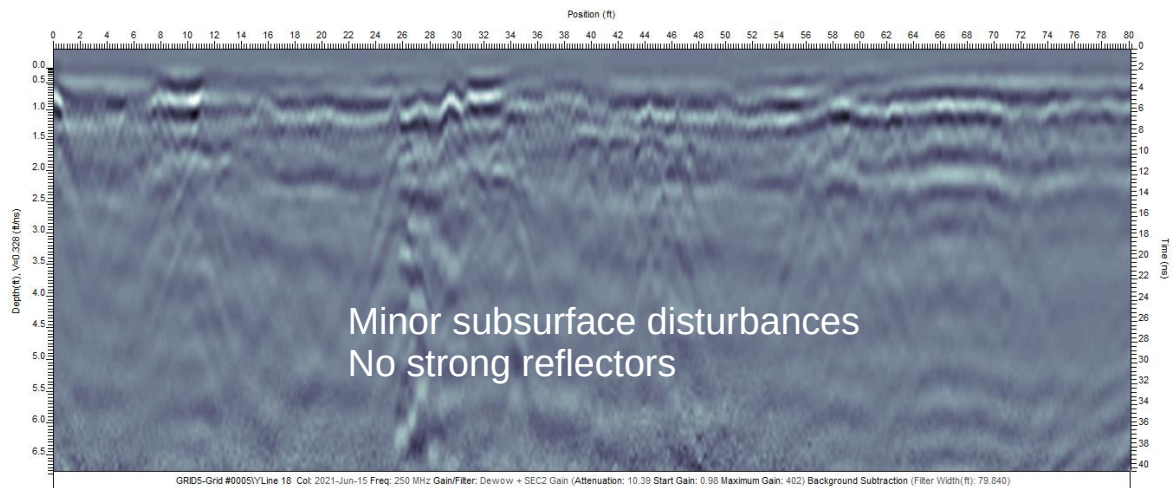


Figure 6

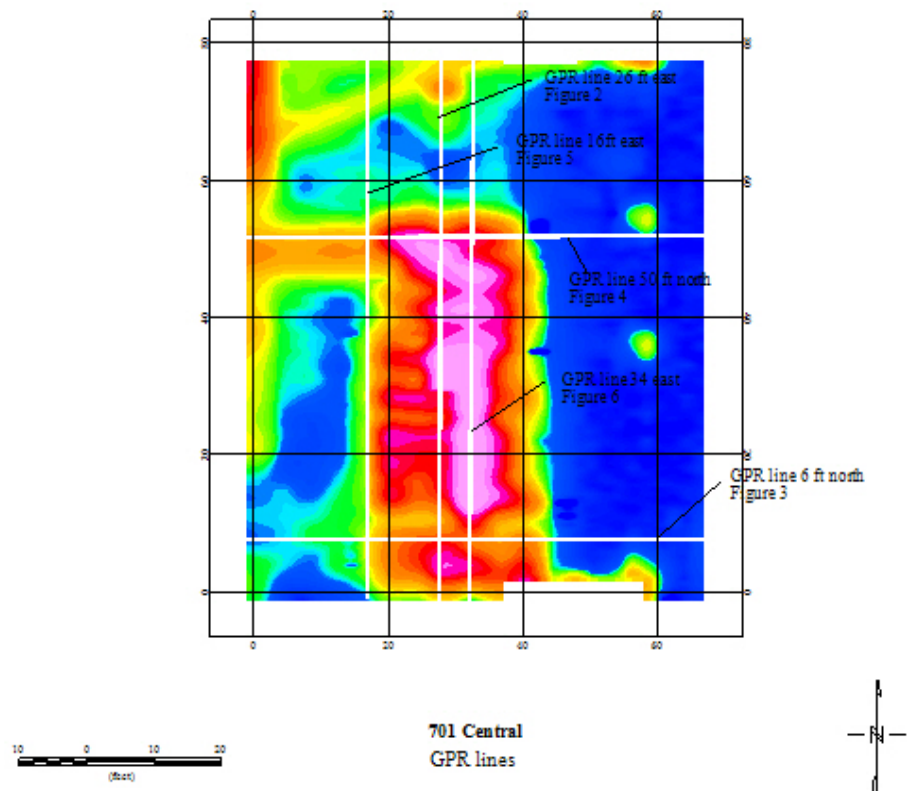


Figure 7

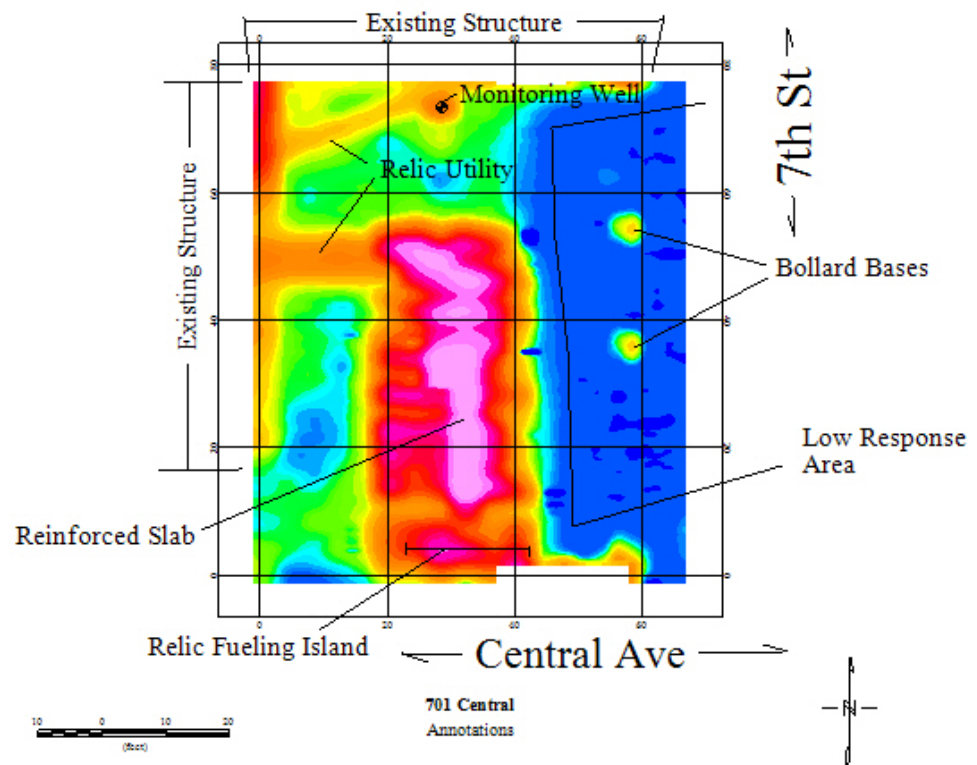
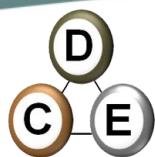


Figure 8

Appendix C
Asbestos/Lead-Based Paint Survey Report
DC Environmental, Inc.



DC Environmental
Consulting and Training Services

Asbestos and Lead-Based Paint Survey Firestone Auto Center

701 Central Avenue NW
Albuquerque, New Mexico

PREPARED FOR:

Intera

Mr. Joe Tracy

**6000 Uptown Boulevard NE #220
Albuquerque, New Mexico 87110**

PREPARED BY:

DC Environmental

PO Box 9315
Albuquerque, New Mexico 87119
505.869.8000

August 12, 2021
Project No. 21-134



DC Environmental
Consulting and Training Services

August 12, 2021
Project No. 21-134

Intera
Mr. Joe Tracy
6000 Uptown Boulevard NE #220
Albuquerque, New Mexico 87110

Subject: Firestone Auto Center
701 Central Avenue NW
Albuquerque, New Mexico

Dear Mr. Tracy,

In accordance with our proposal, Acme Environmental Industrial Hygiene, Inc. dba DC Environmental has performed an Asbestos-Containing Material and Lead-Based Paint survey of the above-referenced facility. The attached report presents our methodology, findings, opinions, and recommendations regarding the survey.

We appreciate the opportunity to be of service to you on this project. Should you have any questions regarding this report, please contact the undersigned at your convenience.

Sincerely,
ACME ENVIRONMENTAL INDUSTRIAL HYGIENE, INC.
DC Environmental

David Charlesworth

J. David Charlesworth,
Certified Industrial Hygienist

Karen Dremann

Karen Dremann
President

Distribution: (2) Addressee

TABLE OF CONTENTS

	<u>Page</u>
EXECUTIVE SUMMARY	2
1. INTRODUCTION	3
2. PURPOSE AND SCOPE OF SERVICES	3
3. SITE DESCRIPTION	3
4. ACTIVITIES	3
4.1. Asbestos-Containing Materials	4
4.2. Lead Based Paint Inspection by X-Ray Fluorescence	4
5. ANALYSES AND RESULTS	5
5.1. Asbestos Sample Analysis	5
5.2. Lead in Paint by X-Ray Fluorescence	6
6. FINDINGS AND CONCLUSIONS	6
6.1. Asbestos Sampling Analysis	6
6.2. Lead in Paint by X-Ray Fluorescence	6
7. RECOMMENDATIONS	6
8. LIMITATIONS	8

Table

Table 1 - Asbestos Sample Analysis

Appendices

Appendix A: Laboratory Analysis Results

Appendix B: XRF Results Table

Appendix C: Photographic Log

Appendix D: Figures

Appendix E: Certifications

EXECUTIVE SUMMARY

On August 4, 2021, DC Environmental conducted an inspection of the Firestone Auto Center, in Albuquerque, New Mexico. The inspection was conducted in response to a request to identify materials which may be impacted during renovation activities. The focus of our inspection was to determine the presence, location and quantity of asbestos containing building materials within the facility and to establish the basis for the presence of lead containing finishes within the structure. The space is being evaluated for the State of New Mexico and the concern is that existing materials may contain asbestos and lead in the finishes.

The inspection design was to conduct an investigation for asbestos-containing materials, access the functional spaces, where appropriate; and sample materials suspect for asbestos within the various building components. Asbestos-containing materials are those containing greater than one percent asbestos as determined by polarized light microscopy. Asbestos was identified in:

- Roofing penetration mastic

Lead-based paint is defined as coatings containing surface area lead of 1.0 milligrams per square centimeter (1.0 mg/cm²) when evaluated by X-Ray Fluorescence. Lead based paint is further defined if laboratory analysis determines the lead content to be one half (0.5 %) percent by weight or greater. The lead inspection of the facility was conducted using an X-Ray Fluorescence (XRF) handheld instrument of select areas.

The DC Environmental Lead inspector identified lead-based paint on the following surfaces in the structure:

- Beige paint in the upstairs storage room.
- White paint on the concrete in the lobby.
- Black paint in the following Locations:
 - Exterior concrete Walls
- Yellow paint in the following locations:
 - Parking lot striping and bollards.
- Grey paint in the following Locations:
 - Exterior concrete Walls
- Blue paint in the following locations:
 - Shop Walls
 - Shop Bathroom Wall
 - Lobby Wall
 - Storage Room
- Red paint in the following locations:
 - Storage Room
 - Exterior concrete

1. INTRODUCTION

In accordance with our proposal, DC Environmental has performed an investigation of the Firestone Auto Center in Albuquerque, New Mexico.

The inspection was conducted in response to a request by Thomas Gonzales of Facilities Management to have building materials evaluated for future renovation activities. The focus of our inspection was to determine the presence, location, and quantity of asbestos and lead based paint present within the facility. The space is being inspected for Facilities Management and the concern is that existing materials may contain asbestos in building materials and lead in the painted finishes.

This report has been prepared in accordance with generally accepted environmental science and engineering practices. This report is based upon conditions at the subject building at the time of the sampling activities and provides documentation of our findings and recommendations.

2. PURPOSE AND SCOPE OF SERVICES

The inspection design was to conduct an investigation and assess the facility for the presence of asbestos containing materials and lead-based paint. The inspection included a quantitative determination of the asbestos and lead content within the structure.

The objective of this inspection was to perform the requisite sampling and present the findings along with any recommendations. The services performed by DC Environmental are outlined below.

- A reconnaissance of the site was conducted by DC Environmental's Industrial Hygiene Technicians. Mr. Jose Rivera is an Accredited Asbestos Building Inspector and Jim Calvert is an EPA Certified Lead Inspector.
- Sampling was conducted using several different types of inspection tools and laboratory techniques including Polarized Light Microscopy and X-Ray Fluorescence.
- A report, summarizing our sampling methods and laboratory analysis, is included. This report details our conclusions and recommendations for the project.

3. SITE DESCRIPTION

The subject building is an unoccupied former auto service center with an unknown date of construction. The structure is two levels of various construction styles and unknown history of renovation. Interior areas are typical auto repair and lobby spaces finished with vinyl tiles and concrete. Walls are a CMU and gypsum wallboard system. Ceilings are 2x4 foot drop ceilings on a metal grid and unfinished.

4. ACTIVITIES

On August 4, 2021 DC Environmental conducted an inspection of the structures. The asbestos and lead-based paint inspection focused on identified working areas. Approximately thirty-six (36) asbestos samples and seventy-seven (77) XRF samples were measured.

4.1. Asbestos-Containing Materials

Mr. Rivera conducted a visual inspection for asbestos containing material at the above referenced structures. DC Environmental collected random samples that were tested for asbestos using Polarized Light Microscopy and stereomicroscopy bulk asbestos analysis. Analysis was conducted by Crisp Analytical Laboratories, LLC of Carrollton, Texas. Crisp Analytical is an accredited laboratory and recognized by the National Voluntary Laboratory Accreditation Program.

The Environmental Protection Agency has established terminology regarding asbestos and specifically Asbestos-Containing Building Materials (ACBM). Material which is friable are those materials which can be crushed, crumbled or reduced to powder by hand pressure. Non-friable materials are further characterized as Category I Non-Friable or Category II Non-Friable. Category I Non Friable includes four specific items: Packings, Gaskets, Resilient Flooring and Asphalt Roofing. Category II Non-Friable is everything else which cannot be crumbled or pulverized by hand pressure. These items include materials of drywall systems, plasters, asbestos-containing cements (Transite[®]) and other materials declared non-friable by the asbestos inspector.

The EPA then clarifies that certain materials are Regulated Asbestos Containing Materials (RACM) and these include the following four designations:

- Friable materials;
- Category I Non-Friable Materials which have become friable;
- Category I Non-Friable Materials which have been subject to sanding, grinding, cutting and abrading; and
- Category II Non-friable materials which will be, or have been, subject to force during demolition or renovation.

4.2. Lead Based Paint Inspection by X-Ray Fluorescence

The presence of lead-based paint was assessed in substantial compliance with the Housing and Urban Development guidelines. Mr. Calvert conducted a lead-based surface coating screening survey of the interior of the property to generally identify building components coated with lead. The survey consisted of testing the lead concentrations of each of the accessible surfaces.

To complete the survey, an X-Ray Fluorescence device was used to perform the lead-based paint inspection. The Viken PB200i XRF is capable of detecting lead in lead-based paint. The determination of lead in paint is defined as a surface content of at least 1.0 milligrams per square centimeter. If the readings were between the 0.9 to 1.1 mg/cm² range, then the readings are declared as either lead based paint or paint chip sampling is recommended. Paint chip sampling was not conducted as part of this survey.

Surfaces that were tested with the XRF device included, but were not limited to the following: ceiling, painted walls, painted or varnished door components, window components, cabinetry, and exterior surfaces.

The XRF device recorded lead-based paint in excess to the regulatory limit of 1.0 mg/cm². Please refer to the XRF readings in Appendix B to this document for the complete indication of the XRF readings along with the calibration records.

5. ANALYSES AND RESULTS

The results of samples and analysis are presented in the following tables. Copies of the laboratory analytical results are included in the appendix to this document.

5.1. Asbestos Sample Analysis

Table 1: Asbestos Sample Analysis

Sample #	Sample Description	Visual estimate percent/ Asbestos Type
21-134-01	South wall workshop blue paint chip	None Detected
21-134-02	North wall workshop blue paint chip	None Detected
21-134-03	West wall workshop blue paint chip	None Detected
21-134-04	South wall parts room red plaster by door	None Detected
21-134-05	West wall parts room red plaster	None Detected
21-134-06	North wall sand blasting room red plaster	None Detected
21-134-07	South wall upstairs storage beige plaster	None Detected
21-134-08	South wall upstairs storage white drywall	None Detected
21-134-09	East wall upstairs storage beige plaster	None Detected
21-134-10	North wall upstairs storage beige plaster	None Detected
21-134-11	West wall lobby white drywall	None Detected
21-134-12	West wall lobby white drywall	None Detected
21-134-13	Lobby 12x12 grey with white fleck, top layer, yellow mastic	None Detected
21-134-14	Lobby 12x12 grey with white fleck, bottom layer, yellow mastic	None Detected
21-134-15	Lobby 12x12 black with white fleck, yellow mastic	None Detected
21-134-16	Lobby 12x12 beige with fleck, bottom layer, black mastic	None Detected
21-134-17	Lobby 12x12 grey with white fleck, bottom layer, yellow mastic	None Detected
21-134-18	Lobby 12x12 grey with white fleck, top layer, yellow mastic	None Detected
21-134-19	2x4 perforated white ceiling tile	None Detected
21-134-20	2x4 perforated white ceiling tile	None Detected
21-134-21	2x4 perforated white ceiling tile	None Detected
21-134-22	1x1 perforated white ceiling tile	None Detected
21-134-23	1x1 perforated white ceiling tile	None Detected
21-134-24	1x1 perforated white ceiling tile	None Detected
21-134-25	Lobby window, white putty glazing	None Detected
21-134-26	East wall upstairs office, white window glazing	None Detected
21-134-27	North wall upstairs storage, red window glazing	None Detected
21-134-28	Rooftop exhaust pipe, grey mastic	2% Chrysotile
21-134-29	Rooftop boiler exhaust pipe, grey mastic	2% Chrysotile
21-134-30	Rooftop exhaust pipe, grey mastic	3% Chrysotile
21-134-31	Boiler room furnace light brown fire brick	None Detected
21-134-32	Boiler room furnace light brown fire brick	None Detected
21-134-33	Boiler room furnace light brown fire brick	None Detected
21-134-34	Outside west wall grey plaster	None Detected
21-134-35	Outside north wall grey plaster	None Detected
21-134-36	Outside north wall grey plaster	None Detected

5.2. Lead in Paint by X-Ray Fluorescence

Due to the size of the Table it is not presented in the text. It is available as Appendix B: XRF Results Table.

Lead-based paint was detected in the facility at the locations listed in Section 6.2.

6. FINDINGS AND CONCLUSIONS

The findings of this inspection are based on our visual observations and analysis of the samples and measurements collected from the facility. Our findings are presented below.

6.1. Asbestos Sampling Analysis

Asbestos was identified in the sampled materials:

- Roofing penetration mastic

Materials reported by Crisp Analytical Laboratory as asbestos-containing material are those materials with greater than one percent asbestos content by Polarized Light Microscopy. Materials with less than or equal to one percent asbestos would be further characterized by the Point Count Method. The verification by Point Count Method using PLM determines if the material may be disposed as municipal waste and not as Regulated Asbestos Waste under the New Mexico Solid Waste Regulations.

6.2. Lead in Paint by X-Ray Fluorescence

Based on the XRF readings, lead-based paint was detected on the following sampled surfaces in the facility.

- Beige paint in the upstairs storage room.
- White paint on the concrete in the lobby.
- Black paint in the following Locations:
 - Exterior concrete Walls
- Yellow paint in the following locations:
 - Parking lot striping and bollards.
- Grey paint in the following Locations:
 - Exterior concrete Walls
- Blue paint in the following locations:
 - Shop Walls
 - Shop Bathroom Wall

- Lobby Wall
- Storage Room
- Red paint in the following locations:
 - Storage Room Exterior concrete

7. RECOMMENDATIONS

Based on our visual observations and the laboratory results, DC Environmental recommends the following:

- Asbestos was identified on the above listed materials and will require abatement prior to demolition/ renovation.
- The Lead-based Paint inspection did indicate lead in excess of the regulatory limits for EPA or the HUD Guidelines. These paints are considered “lead-based”. These painted surfaces will need to be further addressed prior to demolition or renovation by either abatement or additional sampling and analysis with the Toxicity Contaminate Leachate Procedure (TCLP) method.

DC Environmental has no further recommendations at this time; however, if additional materials are to be disturbed, then additional sampling is required.

We appreciate the opportunity to provide sampling and inspection of this area. Should you have additional questions, or if conditions change substantially, please contact us at your earliest convenience.

Sincerely,

DC Environmental

David Charlesworth

Certified Industrial Hygienist

8. LIMITATIONS

The environmental services described in this report have been conducted in general accordance with current regulatory guidelines and the standard-of-care exercised by environmental consultants performing similar work in the project area. No warranty, expressed or implied, is made regarding the professional opinions presented in this report. Variations in site conditions may exist and conditions not observed or described in this report may be encountered during subsequent activities.

The environmental interpretations and opinions contained in this report are based on the results of instrumentation, laboratory tests and/or analyses. Acme Environmental Industrial Hygiene, Inc. has no involvement in, or control over, such equipment, testing and/or analysis. Acme Environmental Industrial Hygiene, Inc. therefore, disclaims responsibility for any inaccuracy in such laboratory results.

Our conclusions, recommendations, and opinions are based on an analysis of the observed site conditions. It should be understood that the conditions of a site could change with time as a result of natural processes or the activities of man at the subject site or nearby sites. In addition, changes to the applicable laws, regulations, codes, and standards of practice may occur due to government action or the broadening of knowledge. The findings of this report may, therefore, be invalidated over time, in part or in whole, by changes over which Acme Environmental Industrial Hygiene, Inc. has no control.

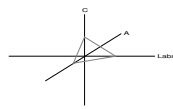
This document is intended to be used only in its entirety. No portion of the document, by itself, is designed to completely represent any aspect of the project described herein. Acme Environmental Industrial Hygiene, Inc. should be contacted if the reader requires any additional information, or has questions regarding content, interpretations presented, or completeness of this document.

This report is intended exclusively for use by the client. Any use or reuse of the findings, conclusions, and/or recommendations of this report by parties other than the client is undertaken at said parties' sole risk.

Appendix A: Laboratory Analysis Results

CA Labs
Dedicated to Quality

Crisp Analytical, L.L.C.
1929 Old Denton Road
Carrollton, TX 75006
Phone 972-242-2754
Fax 972-242-2798



CA Labs, L.L.C.
12232 Industripex, Suite 32
Baton Rouge, LA 70809
Phone 225-751-5632
Fax 225-751-5634

Materials Characterization - Bulk Asbestos Analysis

Laboratory Analysis Report - Polarized Light

DC Environmental

PO Box 9315
Albuquerque, NM 87119

Attn: David Charlesworth

Customer Project: 21-134, Firestone, 701 Central Ave SW
Reference #: CAL21087477AG Date: 08/11/21

Analysis and Method

Summary of polarized light microscopy (PLM / Stereomicroscopy bulk asbestos analysis) using the methods described in 40CFR Part 763 Appendix E to Subpart E (Interim and EPA 600 / R-93 / 116 (Improved). The sample is first viewed with the aid of a stereomicroscope. Numerous liquid slide preparations are created for analysis under the polarized microscope where identifications and quantifications are performed. Calibrated liquid refractive oils are used as liquid mounting medium. These oils are used for identification (dispersion staining). A calibrated visual estimation is reported, should any asbestiform mineral be present. Other techniques such as acid washing are used in conjunction with refractive oils for detection of smaller quantities of asbestos. All asbestos percentages are based on calibrated visual estimation traceable to NIST standards for regulated asbestos. Traceability to measurement and calibration is achieved by using known amounts and types of asbestos from standards where analyst and laboratory accuracy are measured. As little as 0.001% asbestos can be detected in favorable samples, while detection in unfavorable samples may approach the detection limit of 0.50% (well above the laboratory definition of trace).

Discussion

Vermiculite containing samples may contain trace amounts of actinolite/tremolite. When not detected by PLM, these samples should be analyzed using TEM methods and / or water separation techniques. Suspected actinolite/vermiculite presence will be indicated through the sample comment section of this report.

Fibrous talc containing samples may contain a regulated asbestos fiber known as anthophyllite. Under certain conditions the same fiber may actually contain both talc and anthophyllite (a phenomenon called intergrowth). Again, TEM detection methods are recommended. CA Labs PLM report comments will denote suspected amounts of asbestiform anthophyllite with talc, where further analysis is recommended.

Some samples (floor tiles, surfacings, etc.) may contain fibers too small to be detectable by PLM analysis and should be analyzed by TEM bulk protocols.

A "trace asbestos" will be reported if the analyst observes far less than 1% asbestos. CA Labs defines "trace asbestos" as a few fibers detected by the analyst in several preparations and will indicate as such under these circumstances.

Since allowable variation in quantification of samples close to 1% is high, <1% may be reported. Such results are ideal for point counting, and the technique is mandatory for friable samples (NESHAP, Nov. 1990 and clarification letter 8 May 1991) under 1% percent asbestos or "trace asbestos". **In order to make all initial PLM reports issued from CA Labs NESHAP compliant, all <1% asbestos results (except floor tiles) will be point counted at no additional charge.**

Qualifications

CA Labs is accredited by the National Voluntary Accreditation Program (NVLAP) for selected test methods for airborne fiber analysis (TEM), and for bulk asbestos fiber analysis (PLM). CA Labs is also accredited by AIHA LAP, LLC. in the PLM asbestos field of testing for Industrial Hygiene. All analysts have completed college courses or hold a degree in a natural science (geology, biology, or environmental science). Recognition by a state professional board in one these disciplines is preferred, but not required. Extensive in-house training programs are used to augment the educational background of the analyst. The Laboratory Director and Quality Manager have received supplemental McCrone Research training for asbestos identification. Analysis performed at Crisp Analytical Labs, LLC 1929 Old Denton Road Carrollton, TX 75006

Dallas NVLAP Lab Code 200349-0 TEM/PLM TCEQ# T104704513-15-3 TDH 30-0235
AIHA LAP, LLC Laboratory #102929

Overview of Project Sample Material Containing Asbestos

Customer Project:			21-134, Firestone, 701 Central Ave SW	CA Labs Project #: CAL21087477AG		
Laboratory Sample ID	Sample #	Layer #	Analysts Physical Description of Subsample	Asbestos type / calibrated visual estimate percent	List of Affected Building Material Types	
72605	21-134-28	28-1	Pipe, Mastic/ gray and silver sealant	2% Chrysotile	gray and silver sealant black and silver sealant	
72606	21-134-29	29-1	Pipe, Mastic/ gray and silver sealant	2% Chrysotile		
72606		29-2	black and silver sealant	2% Chrysotile		
72607	21-134-30	30-1	Pipe, Mastic/ black and silver sealant	3% Chrysotile		

Dallas NVLAP Lab Code 200349-0 TEM/PLM TCEQ# T104704513-15-3 TDH 30-0235
AIHA LAP, LLC Laboratory #102929

Glossary of abbreviations (non-asbestos fibers and non-fibrous minerals):

ca - carbonate	pe - perlite	fg - fiberglass	pa - palygorskite (clay)
gypsum - gypsum	qu - quartz	mw - mineral wool	
bi - binder		wo - wollastonite	
or - organic		ta - talc	
ma - matrix		sy - synthetic	
mi - mica		ce - cellulose	
ve - vermiculite		br - brucite	
ot - other		ka - kaolin (clay)	

This report relates to the items tested. This report is not to be used by the customer to claim product certification, approval or endorsement by NVLAP, NIST, AIHA LAP, LLC, or any other agency of the federal government. This report may not be reproduced except in full without written permission from CA Labs. These results are submitted pursuant to CA Labs' current terms and sale, condition of sale, including the company's standard warranty and limitations of liability provisions and no responsibility or liability is assumed for the manner in which the results are used or interpreted. Unless notified in writing to return the samples covered by this report, CA Labs will store the samples for a period of ninety (90) days before discarding. A shipping or handling fee may be assessed for the return of any samples.

Polarized Light Asbestiform Materials Characterization

Customer Info:	Attn: David Charlesworth	Customer Project:	CA Labs Project #:
DC Environmental		21-134, Firestone, 701 Central Ave SW	CAL21087477AG
PO Box 9315		Turnaround Time:	Date: 8/11/2021
Albuquerque, NM 87119		2 days	Samples Rec'd: 8/9/21 10:30AM
Phone #	505-869-8000		Date Of Sampling: 8/4/2021
Fax #	505-869-9453		Purchase Order #:

Laboratory Sample ID	Sample #	Comment	Layer #	Analysts Physical Description of Subsample	Homo-geneous (Y/N)	Asbestos type / calibrated visual estimate percent	Non-asbestos fiber type / percent	Non-fibrous type / percent
72578	21-134-01		1-1	Paint Chip/ off-white surfaced white finishing compound	n	None Detected	100% qu,bi,ca	
72578			1-2	off-white surfaced gray plaster	n	None Detected	100% qu,bi,ca	
72579	21-134-02		2-1	Paint Chip/ off-white surfacing	y	None Detected	100% qu,bi	
72580	21-134-03		3-1	Paint Chip/ off-white surfaced white finishing compound	n	None Detected	100% qu,bi,ca	
72580			3-2	off-white surfaced gray plaster	n	None Detected	100% qu,bi,ca	
72581	21-134-04		4-1	Plaster/ red surfaced off-white plaster	n	None Detected	100% qu,bi,ca	
72582	21-134-05		5-1	Plaster/ red surfaced off-white plaster	n	None Detected	100% qu,bi,ca	

Dallas NVLAP Lab Code 200349-0 TEM/PLM TCEQ# T104704513-15-3 TDH 30-0235


AIHA LAP, LLC Laboratory #102929

Analysis Method: Interim (40CFR Part 763 Appendix E to Subpart E) / Improved (EPA-600 / R-93/116). All samples received in good condition unless noted.

Preparation Method: HCL acid washing for carbonate based samples, chemical reduction for organically bound components, oil immersion for identification of asbestos types by dispersion staining / becke line method.

ca - carbonate	mi - mica	fg - fiberglass	ce - cellulose
gy - gypsum	ve - vermiculite	mw - mineral wool	br - brucite
bi - binder	ot - other	wo - wollastonite	ka - kaolin (clay)
or - organic	pe - perlite	ta - talc	pa - palygorskite (clay)
ma - matrix	qu - quartz	sy - synthetic	

Approved Signatories:


Robert Olivarez
Analyst

1. Fire Damage significant fiber damage - reported percentages reflect unaltered fibers
2. Fire Damage no significant fiber damages effecting fibrous percentages
3. Actinolite in association with Vermiculite
4. Layer not analyzed - attached to previous positive layer and contamination is suspected
5. Not enough sample to analyze


Technical Manager
Tanner Rasmussen

Senior Analyst
Julio Robles

6. Anthophyllite in association with Fibrous Talc
7. Contamination suspected from other building materials
8. Favorable scenario for water separation on vermiculite for possible analysis by another method
9. < 1% Result point counted positive
10. TEM analysis suggested

Polarized Light Asbestiform Materials Characterization

Customer Info:
DC Environmental
PO Box 9315
Albuquerque, NM 87119

Attn: David Charlesworth

Customer Project:
21-134, Firestone, 701 Central Ave SW

CA Labs Project #:
CAL21087477AG

Turnaround Time:
2 days

Date: 8/11/2021

Samples Rec'd: 8/9/21 10:30AM

Date Of Sampling: 8/4/2021

Purchase Order #:

Phone # 505-869-8000
Fax # 505-869-9453

Laboratory Sample ID	Sample #	Comment	Layer #	Analysts Physical Description of Subsample	Homo-geneous (Y/N)	Asbestos type / calibrated visual estimate percent	Non-asbestos fiber type / percent	Non-fibrous type / percent
72583	21-134-06	6-1		Plaster/ red surfaced off-white plaster	n	None Detected		100% qu,bi,ca
72584	21-134-07	7-1		Plaster/ off-white surfaced off-white plaster	n	None Detected		100% qu,bi,ca
72585	21-134-08	8-1		Drywall/ white drywall with brown paper	n	None Detected	21% ce	79% qu,gy
72586	21-134-09	9-1		Plaster/ off-white surfaced off-white plaster	n	None Detected		100% qu,bi,ca
72587	21-134-10	10-1		Plaster/ off-white surfaced off-white plaster	n	None Detected		100% qu,bi,ca
72588	21-134-11	11-1		Drywall/ white surfaced white compound	n	None Detected		100% qu,bi,ca
72588		11-2		white drywall with brown paper	n	None Detected	20% ce	80% qu,gy

Dallas NVLAP Lab Code 200349-0 TEM/PLM TCEQ# T104704513-15-3 TDH 30-0235


AIHA LAP, LLC Laboratory #102929

Analysis Method: Interim (40CFR Part 763 Appendix E to Subpart E) / Improved (EPA-600 / R-93/116). All samples received in good condition unless noted.

Preparation Method: HCL acid washing for carbonate based samples, chemical reduction for organically bound components, oil immersion for identification of asbestos types by dispersion attaining / becke line method.

ca - carbonate	mi - mica	fg - fiberglass	ce - cellulose
gy - gypsum	ve - vermiculite	mw - mineral wool	br - brucite
bi - binder	ot - other	wo - wollastonite	ka - kaolin (clay)
or - organic	pe - perlite	ta - talc	pa - palygorskite (clay)
ma - matrix	qu - quartz	sy - synthetic	

Approved Signatories:


Robert Olivarez
Analyst

1. Fire Damage significant fiber damage - reported percentages reflect unaltered fibers
2. Fire Damage no significant fiber damages effecting fibrous percentages
3. Actinolite in association with Vermiculite
4. Layer not analyzed - attached to previous positive layer and contamination is suspected
5. Not enough sample to analyze


Technical Manager
Tanner Rasmussen

Senior Analyst
Julio Robles

6. Anthophyllite in association with Fibrous Talc
7. Contamination suspected from other building materials
8. Favorable scenario for water separation on vermiculite for possible analysis by another method
9. < 1% Result point counted positive
10. TEM analysis suggested

Polarized Light Asbestiform Materials Characterization

Customer Info:
DC Environmental
PO Box 9315
Albuquerque, NM 87119

Attn: David Charlesworth

Customer Project:
21-134, Firestone, 701 Central Ave SW

CA Labs Project #:
CAL21087477AG

Turnaround Time:
2 days

Date: 8/11/2021

Samples Rec'd: 8/9/21 10:30AM

Phone # 505-869-8000
Fax # 505-869-9453

Date Of Sampling: 8/4/2021

Purchase Order #:

Laboratory Sample ID	Sample #	Comment	Layer #	Analysts Physical Description of Subsample	Homo-geneous (Y/N)	Asbestos type / calibrated visual estimate percent	Non-asbestos fiber type / percent	Non-fibrous type / percent
----------------------	----------	---------	---------	--	--------------------	--	-----------------------------------	----------------------------

72589	21-134-12	12-1		Drywall/ off-white surfaced white compound	n	None Detected	100% qu,bi,ca	
72589		12-2		white drywall with brown paper	n	None Detected	20% ce	80% qu,gy
72590	21-134-13	13-1		12x12, Mastic/ gray floor tile	y	None Detected	100% qu,ca	
72590		13-2		tan mastic	y	None Detected	100% gy,bi	
72591	21-134-14	14-1		12x12, Mastic/ tan floor tile	y	None Detected	100% qu,ca	
72591		14-2		tan mastic	y	None Detected	100% gy,bi	
72592	21-134-15	15-1		12x12, Mastic/ black floor tile	y	None Detected	100% qu,ca	

Dallas NVLAP Lab Code 200349-0 TEM/PLM TCEQ# T104704513-15-3 TDH 30-0235


AIHA LAP, LLC Laboratory #102929

Analysis Method: Interim (40CFR Part 763 Appendix E to Subpart E) / Improved (EPA-600 / R-93/116). All samples received in good condition unless noted.

Preparation Method: HCL acid washing for carbonate based samples, chemical reduction for organically bound components, oil immersion for identification of asbestos types by dispersion staining / becke line method.

ca - carbonate	mi - mica	fg - fiberglass	ce - cellulose
gy - gypsum	ve - vermiculite	mw - mineral wool	br - brucite
bi - binder	ot - other	wo - wollastonite	ka - kaolin (clay)
or - organic	pe - perlite	ta - talc	pa - palygorskite (clay)
ma - matrix	qu - quartz	sy - synthetic	

Approved Signatories:


Robert Olivarez
Analyst

1. Fire Damage significant fiber damage - reported percentages reflect unaltered fibers
2. Fire Damage no significant fiber damages effecting fibrous percentages
3. Actinolite in association with Vermiculite
4. Layer not analyzed - attached to previous positive layer and contamination is suspected
5. Not enough sample to analyze


Technical Manager
Tanner Rasmussen

Senior Analyst
Julio Robles

6. Anthophyllite in association with Fibrous Talc
7. Contamination suspected from other building materials
8. Favorable scenario for water separation on vermiculite for possible analysis by another method
9. < 1% Result point counted positive
10. TEM analysis suggested

Polarized Light Asbestiform Materials Characterization

Customer Info:
DC Environmental
PO Box 9315
Albuquerque, NM 87119

Attn: David Charlesworth

Customer Project:
21-134, Firestone, 701 Central Ave SW

CA Labs Project #:
CAL21087477AG

Turnaround Time:
2 days

Date: 8/11/2021

Samples Rec'd: 8/9/21 10:30AM

Phone # 505-869-8000
Fax # 505-869-9453

Date Of Sampling: 8/4/2021

Purchase Order #:

Laboratory Sample ID	Sample #	Comment	Layer #	Analysts Physical Description of Subsample	Homo-geneous (Y/N)	Asbestos type / calibrated visual estimate percent	Non-asbestos fiber type / percent	Non-fibrous type / percent
----------------------	----------	---------	---------	--	--------------------	--	-----------------------------------	----------------------------

72594	21-134-17	17-1	12x12, Mastic/	gray floor tile	y	None Detected		
-------	-----------	------	----------------	-----------------	---	---------------	--	--

72594		17-2	tan mastic		y	None Detected		100% qu,ca
-------	--	------	------------	--	---	---------------	--	------------

72596	21-134-19	19-1	2x4 Ceiling Tile/ white surfacing		y	None Detected		100% qu,bi
-------	-----------	------	-----------------------------------	--	---	---------------	--	------------

72596		19-2	tan ceiling tile		y	None Detected	30% ce 30% fg	40% qu,pe
-------	--	------	------------------	--	---	---------------	------------------	-----------

72597	21-134-20	20-1	2x4 Ceiling Tile/ white surfacing		y	None Detected		100% qu,bi
-------	-----------	------	-----------------------------------	--	---	---------------	--	------------

72597		20-2	tan ceiling tile		y	None Detected	30% ce 30% fg	40% qu,pe
-------	--	------	------------------	--	---	---------------	------------------	-----------

72598	21-134-21	21-1	2x4 Ceiling Tile/ white surfacing		y	None Detected		100% qu,bi
-------	-----------	------	-----------------------------------	--	---	---------------	--	------------

Dallas NVLAP Lab Code 200349-0 TEM/PLM TCEQ# T104704513-15-3 TDH 30-0235


AIHA LAP, LLC Laboratory #102929

Analysis Method: Interim (40CFR Part 763 Appendix E to Subpart E) / Improved (EPA-600 / R-93/116). All samples received in good condition unless noted.

Preparation Method: HCL acid washing for carbonate based samples, chemical reduction for organically bound components, oil immersion for identification of asbestos types by dispersion staining / becke line method.

ca - carbonate	mi - mica	fg - fiberglass	ce - cellulose
gy - gypsum	ve - vermiculite	mw - mineral wool	br - brucite
bi - binder	ot - other	wo - wollastonite	ka - kaolin (clay)
or - organic	pe - perlite	ta - talc	pa - palygorskite (clay)
ma - matrix	qu - quartz	sy - synthetic	

Approved Signatories:


Robert Olivarez
Analyst

1. Fire Damage significant fiber damage - reported percentages reflect unaltered fibers
2. Fire Damage no significant fiber damages effecting fibrous percentages
3. Actinolite in association with Vermiculite
4. Layer not analyzed - attached to previous positive layer and contamination is suspected
5. Not enough sample to analyze


Technical Manager
Tanner Rasmussen

Senior Analyst
Julio Robles

6. Anthophyllite in association with Fibrous Talc
7. Contamination suspected from other building materials
8. Favorable scenario for water separation on vermiculite for possible analysis by another method
9. < 1% Result point counted positive
10. TEM analysis suggested

Polarized Light Asbestiform Materials Characterization

Customer Info:
DC Environmental
PO Box 9315
Albuquerque, NM 87119

Attn: David Charlesworth

Customer Project:
21-134, Firestone, 701 Central Ave SW

CA Labs Project #:
CAL21087477AG

Turnaround Time:
2 days

Date: 8/11/2021

Samples Rec'd: 8/9/21 10:30AM

Phone # 505-869-8000
Fax # 505-869-9453

Date Of Sampling: 8/4/2021

Purchase Order #:

Laboratory Sample ID	Sample #	Comment	Layer #	Analysts Physical Description of Subsample	Homo-geneous (Y/N)	Asbestos type / calibrated visual estimate percent	Non-asbestos fiber type / percent	Non-fibrous type / percent
72598			21-2	tan ceiling tile	y	None Detected	30% ce 30% fg	40% qu,pe
				1x1 Perforated Ceiling Tile/				
72599	21-134-22		22-1	white surfacing	y	None Detected		100% qu,bi
				1x1 Perforated Ceiling Tile/				
72599			22-2	tan ceiling tile	y	None Detected	100% ce	
				1x1 Perforated Ceiling Tile/				
72600	21-134-23		23-1	white surfacing	y	None Detected		100% qu,bi
				1x1 Perforated Ceiling Tile/				
72600			23-2	tan ceiling tile	y	None Detected	100% ce	
				1x1 Perforated Ceiling Tile/				
72601	21-134-24		24-1	white surfacing	y	None Detected		100% qu,bi
				1x1 Perforated Ceiling Tile/				
72601			24-2	tan ceiling tile	y	None Detected	100% ce	

Dallas NVLAP Lab Code 200349-0 TEM/PLM TCEQ# T104704513-15-3 TDH 30-0235


AIHA LAP, LLC Laboratory #102929

Analysis Method: Interim (40CFR Part 763 Appendix E to Subpart E) / Improved (EPA-600 / R-93/116). All samples received in good condition unless noted.

Preparation Method: HCL acid washing for carbonate based samples, chemical reduction for organically bound components, oil immersion for identification of asbestos types by dispersion staining / becke line method.

ca - carbonate	mi - mica	fg - fiberglass	ce - cellulose
gy - gypsum	ve - vermiculite	mw - mineral wool	br - brucite
bi - binder	ot - other	wo - wollastonite	ka - kaolin (clay)
or - organic	pe - perlite	ta - talc	pa - palygorskite (clay)
ma - matrix	qu - quartz	sy - synthetic	

Approved Signatories:


Robert Olivarez
Analyst

1. Fire Damage significant fiber damage - reported percentages reflect unaltered fibers
2. Fire Damage no significant fiber damages effecting fibrous percentages
3. Actinolite in association with Vermiculite
4. Layer not analyzed - attached to previous positive layer and contamination is suspected
5. Not enough sample to analyze


Technical Manager
Tanner Rasmussen

Senior Analyst
Julio Robles

6. Anthophyllite in association with Fibrous Talc
7. Contamination suspected from other building materials
8. Favorable scenario for water separation on vermiculite for possible analysis by another method
9. < 1% Result point counted positive
10. TEM analysis suggested

Polarized Light Asbestiform Materials Characterization

Customer Info:
DC Environmental
PO Box 9315
Albuquerque, NM 87119

Attn: David Charlesworth

Customer Project:
21-134, Firestone, 701 Central Ave SW

CA Labs Project #:
CAL21087477AG

Turnaround Time:
2 days

Date: 8/11/2021

Samples Rec'd: 8/9/21 10:30AM

Date Of Sampling: 8/4/2021

Purchase Order #:

Phone # 505-869-8000
Fax # 505-869-9453

Laboratory Sample ID	Sample #	Comment	Layer #	Analysts Physical Description of Subsample	Homo-geneous (Y/N)	Asbestos type / calibrated visual estimate percent	Non-asbestos fiber type / percent	Non-fibrous type / percent
72602	21-134-25	25-1		Putty Glazing/ white sealant	y	None Detected		100% qu,gy,bi
72603	21-134-26	26-1		Window Glazing/ brown sealant	y	None Detected		100% qu,gy,bi
72604	21-134-27	27-1		Window Glazing/ tan sealant	y	None Detected		100% qu,bi,ca
72605	21-134-28	28-1		Pipe, Mastic/ gray and silver sealant	n	2% Chrysotile	2% ta	96% qu,gy,bi
72606	21-134-29	29-1		Pipe, Mastic/ gray and silver sealant	n	2% Chrysotile		98% qu,gy,bi
72606		29-2		black and silver sealant	n	2% Chrysotile		98% qu,gy,bi
72607	21-134-30	30-1		Pipe, Mastic/ black and silver sealant	n	3% Chrysotile		97% qu,gy,bi

Dallas NVLAP Lab Code 200349-0 TEM/PLM TCEQ# T104704513-15-3 TDH 30-0235


AIHA LAP, LLC Laboratory #102929

Analysis Method: Interim (40CFR Part 763 Appendix E to Subpart E) / Improved (EPA-600 / R-93/116). All samples received in good condition unless noted.

Preparation Method: HCL acid washing for carbonate based samples, chemical reduction for organically bound components, oil immersion for identification of asbestos types by dispersion staining / becke line method.

ca - carbonate	mi - mica	fg - fiberglass	ce - cellulose
gy - gypsum	ve - vermiculite	mw - mineral wool	br - brucite
bi - binder	ot - other	wo - wollastonite	ka - kaolin (clay)
or - organic	pe - perlite	ta - talc	pa - palygorskite (clay)
ma - matrix	qu - quartz	sy - synthetic	

Approved Signatories:


Robert Olivarez
Analyst

1. Fire Damage significant fiber damage - reported percentages reflect unaltered fibers
2. Fire Damage no significant fiber damages effecting fibrous percentages
3. Actinolite in association with Vermiculite
4. Layer not analyzed - attached to previous positive layer and contamination is suspected
5. Not enough sample to analyze


Technical Manager
Tanner Rasmussen

Senior Analyst
Julio Robles

6. Anthophyllite in association with Fibrous Talc
7. Contamination suspected from other building materials
8. Favorable scenario for water separation on vermiculite for possible analysis by another method
9. < 1% Result point counted positive
10. TEM analysis suggested

Polarized Light Asbestiform Materials Characterization

Customer Info:
DC Environmental
PO Box 9315
Albuquerque, NM 87119

Attn: David Charlesworth

Customer Project:
21-134, Firestone, 701 Central Ave SW

CA Labs Project #:
CAL21087477AG

Turnaround Time:
2 days

Date: 8/11/2021

Samples Rec'd: 8/9/21 10:30AM

Date Of Sampling: 8/4/2021

Purchase Order #:

Phone # 505-869-8000
Fax # 505-869-9453

Laboratory Sample ID	Sample #	Comment	Layer #	Analysts Physical Description of Subsample	Homo-geneous (Y/N)	Asbestos type / calibrated visual estimate percent	Non-asbestos fiber type / percent	Non-fibrous type / percent
72608	21-134-31	31-1		Fire Brick/ tan bricking	y	None Detected		100% qu,ot
72609	21-134-32	32-1		Fire Brick/ tan bricking	y	None Detected		100% qu,ot
72610	21-134-33	33-1		Fire Brick/ tan bricking	y	None Detected		100% qu,ot
72611	21-134-34	34-1		Plaster/ gray surfaced white finishing compound	n	None Detected		100% qu,bi,ca
72611		34-2		tan plaster	y	None Detected		100% qu,ca
72612	21-134-35	35-1		Plaster/ gray surfaced white finishing compound	n	None Detected		100% qu,bi,ca
72612		35-2		tan plaster	y	None Detected		100% qu,ca

Dallas NVLAP Lab Code 200349-0 TEM/PLM TCEQ# T104704513-15-3 TDH 30-0235


AIHA LAP, LLC Laboratory #102929

Analysis Method: Interim (40CFR Part 763 Appendix E to Subpart E) / Improved (EPA-600 / R-93/116). All samples received in good condition unless noted.

Preparation Method: HCL acid washing for carbonate based samples, chemical reduction for organically bound components, oil immersion for identification of asbestos types by dispersion staining / becke line method.

ca - carbonate	mi - mica	fg - fiberglass	ce - cellulose
gy - gypsum	ve - vermiculite	mw - mineral wool	br - brucite
bi - binder	ot - other	wo - wollastonite	ka - kaolin (clay)
or - organic	pe - perlite	ta - talc	pa - palygorskite (clay)
ma - matrix	qu - quartz	sy - synthetic	

Approved Signatories:


Robert Olivarez
Analyst

1. Fire Damage significant fiber damage - reported percentages reflect unaltered fibers
2. Fire Damage no significant fiber damages effecting fibrous percentages
3. Actinolite in association with Vermiculite
4. Layer not analyzed - attached to previous positive layer and contamination is suspected
5. Not enough sample to analyze


Technical Manager
Tanner Rasmussen

Senior Analyst
Julio Robles

6. Anthophyllite in association with Fibrous Talc
7. Contamination suspected from other building materials
8. Favorable scenario for water separation on vermiculite for possible analysis by another method
9. < 1% Result point counted positive
10. TEM analysis suggested

Polarized Light Asbestiform Materials Characterization

Customer Info:
DC Environmental
PO Box 9315
Albuquerque, NM 87119

Attn: David Charlesworth

Customer Project:
21-134, Firestone, 701 Central Ave SW

CA Labs Project #:
CAL21087477AG

Turnaround Time:
2 days

Date: 8/11/2021

Samples Rec'd: 8/9/21 10:30AM

Phone # 505-869-8000
Fax # 505-869-9453

Date Of Sampling: 8/4/2021

Purchase Order #:

Laboratory Sample ID	Sample #	Comment	Layer #	Analysts Physical Description of Subsample	Homo-geneous (Y/N)	Asbestos type / calibrated visual estimate percent	Non-asbestos fiber type / percent	Non-fibrous type / percent
----------------------	----------	---------	---------	--	--------------------	--	-----------------------------------	----------------------------

72613	21-134-36	36-1	Plaster/ gray surfaced white finishing compound	n	None Detected	100% qu,bi,ca
-------	-----------	------	---	---	---------------	---------------

72613		36-2	tan plaster	y	None Detected	100% qu,ca
-------	--	------	-------------	---	---------------	------------

Dallas NVLAP Lab Code 200349-0 TEM/PLM TCEQ# T104704513-15-3 TDH 30-0235


AIHA LAP, LLC Laboratory #102929

Analysis Method: Interim (40CFR Part 763 Appendix E to Subpart E) / Improved (EPA-600 / R-93/116). All samples received in good condition unless noted.

Preparation Method: HCL acid washing for carbonate based samples, chemical reduction for organically bound components, oil immersion for identification of asbestos types by dispersion attaining / becke line method.

ca - carbonate	mi - mica	fg - fiberglass	ce - cellulose
gy - gypsum	ve - vermiculite	mw - mineral wool	br - brucite
bi - binder	ot - other	wo - wollastonite	ka - kaolin (clay)
or - organic	pe - perlite	ta - talc	pa - palygorskite (clay)
ma - matrix	qu - quartz	sy - synthetic	

Approved Signatories:


Robert Olivarez
Analyst


1. Fire Damage significant fiber damage - reported percentages reflect unaltered fibers
2. Fire Damage no significant fiber damages effecting fibrous percentages
3. Actinolite in association with Vermiculite
4. Layer not analyzed - attached to previous positive layer and contamination is suspected
5. Not enough sample to analyze


Technical Manager
Tanner Rasmussen

Senior Analyst
Julio Robles

6. Anthophyllite in association with Fibrous Talc
7. Contamination suspected from other building materials
8. Favorable scenario for water separation on vermiculite for possible analysis by another method
9. < 1% Result point counted positive
10. TEM analysis suggested



CAL 21087477

 DC Environmental Consulting and Training Services "Promoting Safety in the Workplace"	PO / Job#: 21-134		Date: 08/04/21
	Turn Around Time: Same Day / 1Day <u>2Day</u> / 3Day / 4Day / 5Day		
	<input type="checkbox"/> PCM: <input type="checkbox"/> NIOSH 7400A / <input type="checkbox"/> NIOSH 7400B <input type="checkbox"/> Rotometer		
	<input checked="" type="checkbox"/> <u>PLM</u> : <input type="checkbox"/> Standard / <input type="checkbox"/> Point Count 400 - 1000 / <input type="checkbox"/> CARB 435		
DC Environmental PO Box 9315 Albuquerque, NM 87119		<input type="checkbox"/> TEM Air: <input type="checkbox"/> AHERA / <input type="checkbox"/> Yamate2 / <input type="checkbox"/> NIOSH 7402 <input type="checkbox"/> TEM Bulk: <input type="checkbox"/> Quantitative / <input type="checkbox"/> Qualitative / <input type="checkbox"/> Chatfield <input type="checkbox"/> TEM Water: <input type="checkbox"/> Potable / <input type="checkbox"/> Non-Potable / <input type="checkbox"/> Weight % <input type="checkbox"/> TEM Microvac: <input type="checkbox"/> Qual(+/-) / <input type="checkbox"/> D5755(str/area) / <input type="checkbox"/> D5756(str/mass)	
Contact: J. David Charlesworth			
Phone: 505.869.8000	Fax: 505.869.9453		
E-mail: JDCharlesworthcih@gmail.com		<input type="checkbox"/> IAQ Particle Identification (PLM LAB) <input type="checkbox"/> PLM Opaques/Soot <input type="checkbox"/> Particle Identification (TEM LAB) <input type="checkbox"/> Special Project	
Site: Firestone		<input type="checkbox"/> Metals Analysis: Method:	
Site Location: 701 Central Ave SW Albuquerque NM 87102		Matrix:	
Comments:		Report Via: <input type="checkbox"/> Fax <input type="checkbox"/> E-Mail <input type="checkbox"/> Verbal	

Sample ID	Date	Sample Location / Description	FOR AIR SAMPLES ONLY				Sample Area / Air Volume
			Type	Time On/Off	Avg. LPM	Total Time	
21-134-01	8/4/21	South wall workshop blue paint chip	A P C				
21-134-02	8/4/21	North wall workshop blue paint chip	A P C				
21-134-03	8/4/21	West wall workshop blue paint chip	A P C				
21-134-04	8/4/21	South wall parts room red plaster by door	A P C				
21-134-05	8/4/21	West wall parts room red plaster	A P C				
21-134-06	8/4/21	North wall sand blasting room red plaster	A P C				
21-134-07	8/4/21	South wall upstairs storage beige plaster	A P C				
21-134-08	8/4/21	South wall upstairs storage white drywall	A P C				
21-134-09	8/4/21	East wall upstairs storage beige plaster	A P C				
21-134-10	8/4/21	North wall upstairs storage beige plaster	A P C				

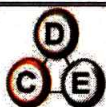
Sampled By: Jose Rivera		
Shipped Via: <input checked="" type="checkbox"/> Fed Ex <input type="checkbox"/> DHL <input type="checkbox"/> UPS <input type="checkbox"/> US Mail <input type="checkbox"/> Courier <input type="checkbox"/> Drop Off <input type="checkbox"/> Other:		
Relinquished By: Jose Rivera Date / Time: 08/04/21 Received By: Fedex Date / Time: 08/04/21 Condition Acceptable? <input type="checkbox"/> Yes <input type="checkbox"/> No	Relinquished By: Date / Time: Received By: Date / Time: Condition Acceptable? <input type="checkbox"/> Yes <input type="checkbox"/> No	Relinquished By: 10:30AM Date / Time: AUG 09 2021 Received By: Date / Time: Condition Acceptable? <input type="checkbox"/> Yes <input type="checkbox"/> No

CAL21097477

 <p>DC Environmental Consulting and Training Services "Promoting Safety in the Workplace" DC Environmental PO Box 9315 Albuquerque, NM 87119</p>		PO / Job#: 21-134		Date: 08/04/21			
		Site: Firestone					
		Site Location: 701 Central Ave SW Albuquerque NM 87102					
		Comments:					
Contact: J. David Charlesworth							
Phone: 505.869.8000	Fax: 505.869.9453						
E-mail: JDCharlesworthcih@gmail.com							
Continuation Sheet for Sample Chain of Custody							
Sample ID	Date	Sample Location / Description	FOR AIR SAMPLES ONLY				Sample Area / Air Volume
			Type	Time On/Off	Avg. LPM	Total Time	
21-134-11	8/4/21	West wall lobby white drywall	A P C				
21-134-12	8/4/21	West wall lobby white drywall	A P C				
21-134-13	8/4/21	Lobby 12x12 grey with white fleck, top layer, yellow mastic	A P C				
21-134-14	8/4/21	Lobby 12x12 grey with white fleck, bottom layer, yellow mastic	A P C				
21-134-15	8/4/21	Lobby 12x12 black with white fleck, yellow mastic	A P C				
21-134-16	8/4/21	Lobby 12x12 beige with fleck, bottom layer, black mastic	A P C				
21-134-17	8/4/21	Lobby 12x12 grey with white fleck, bottom layer, yellow mastic	A P C				
21-134-18	8/4/21	Lobby 12x12 grey with white fleck, top layer, yellow mastic	A P C				
21-134-19	8/4/21	2x4 perforated white ceiling tile	A P C				
21-134-20	8/4/21	2x4 perforated white ceiling tile	A P C				
21-134-21	8/4/21	2x4 perforated white ceiling tile	A P C				
21-134-22	8/4/21	1x1 perforated white ceiling tile	A P C				
21-134-23	8/4/21	1x1 perforated white ceiling tile	A P C				
21-134-24	8/4/21	1x1 perforated white ceiling tile	A P C				
21-134-25	8/4/21	Lobby window, white putty glazing	A P C				
Sampled By: Jose Rivera 							

15:30:00

AUG 09 2021



DC Environmental
Consulting and Training Services

"Promoting Safety in the Workplace"

DC Environmental
PO Box 9315
Albuquerque, NM 87119

Contact:
J. David Charlesworth

Phone:
505.869.8000

Fax:
505.869.9453

E-mail:
JDCharlesworthcih@gmail.com

PO / Job#: 21-134

Date: 08/04/21

Site:
Firestone

Site Location:
701 Central Ave SW Albuquerque NM 87102

Comments:

Continuation Sheet for Sample Chain of Custody

Sample ID	Date	Sample Location / Description	FOR AIR SAMPLES ONLY				Sample Area / Air Volume
			Type	Time On/Off	Avg. LPM	Total Time	
21-134-26	8/4/21	East wall upstairs office, white window glazing	A P C				
21-134-27	8/4/21	North wall upstairs storage, red window glazing	A P C				
21-134-28	8/4/21	Rooftop exhaust pipe, grey mastic	A P C				
21-134-29	8/4/21	Rooftop boiler exhaust pipe, grey mastic	A P C				
21-134-30	8/4/21	Rooftop exhaust pipe, grey mastic	A P C				
21-134-31	8/4/21	Boiler room furnace light brown fire brick	A P C				
21-134-32	8/4/21	Boiler room furnace light brown fire brick	A P C				
21-134-33	8/4/21	Boiler room furnace light brown fire brick	A P C				
21-134-34	8/4/21	Outside west wall grey plaster	A P C				
21-134-35	8/4/21	Outside north wall grey plaster	A P C				
21-134-36	8/4/21	Outside north wall grey plaster	A P C				
			A P C				
			A P C				
			A P C				
			A P C				

Sampled By: Jose Rivera

10:30 AM

AUG 09 2021

Appendix B: XRF Results Table

Project # 21-134 Project Name Firestone Auto Center Date 8-4-21
 Address 701 Central Ave NW

	Time : _____				Results	Average
1		Cal.			1.1	
2		Cal.			1.1	
3		Cal.			1.0	1.07
4		Cal.			0.1	
5		Cal			0.0	
6		Cal.			0.0	0.03
XRF Test Number	Location / Room	Component - Designation	Component Number	Color	Substrate	Result / Reading
07	Shop	D wall	D3	Red	Concrete	0.1
08	Shop	D wall	D3	Blue	Concrete	1.4
09	Shop	C Wall		Red	Concrete	0.5
10	Shop	C Wall		Blue	Concrete	1.7
11	Shop	B Wall		White	Concrete	0.3
12	Shop	B Wall		Red	Concrete	0.1
13	Shop	B Wall		Blue	Concrete	2.5
14	Shop Bathroom	B Wall	B1	Grey	Metal	0.1
15	Shop Bathroom	B Wall	B1	Blue	Wood	12.4
16	Shop Bathroom	B Wall		White	Concrete	0.0
17	Shop Bathroom	B Wall		Blue	Concrete	0.0
18		C Wall		Red	Concrete	-0.1
19	Sandblast Room	C Wall		Red	Drywall	1.7

XRF Test Number	Location / Room	Component-Designation	Component Number	Color	Substrate	Result/Reading
20	Sandblast Room	D Wall	D1	Red	Wood	9.0
21	Sandblast Room	D Wall		Beige	Drywall	0.5
22	Storage	C Wall		Red/Orange	Concrete	1.9
23	Storage	C Wall Door Header	C1	Blue	Wood	9.6
24	Storage	C Wall Door	C1	Blue	Wood	0.0
25	Storage	D Wall		Red	Concrete	4.9
26	Storage	C Wall		Beige	Drywall	-0.1
27	Storage	Floor Safety Line		Yellow	Concrete	7.6
28	Storage Stair tread	A Stairs	A1	Yellow	Wood	0.2
29	Lobby	C Wall		White	Concrete	0.8
30	Lobby	B Wall Column	B2	White	Concrete	0.9
31	Lobby	D Wall		Red	Concrete	0.2
32	Lobby	D Wall		Blue	Concrete	0.9
33	Lobby	B Wall		White	Drywall	0.1
34	Upstairs Storage	Floor		Yellow	Wood	0.0
35	Upstairs Storage	A Wall		White	Concrete	0.0
36	Upstairs Storage	A Wall		White	Concrete	0.0
37	Upstairs Storage	Column	B1	Beige	Wood	12.9
38	Upstairs Storage	Handrail		Red	Wood	0.0
39	Upstairs Storage	Door	B1	Red	Wood	0.0

XRF Test Number	Location / Room	Component-Designation	Component Number	Color	Substrate	Result/Reading
40	Upstairs Storage	A Wall		Beige	Concrete	0.4
41	Upstairs Storage	D Wall		Green	Wood	0.2
42	Upstairs Office	C Wall		Grey	Concrete	0.3
43	Upstairs Office	Ceiling		White	Gypsum Board	0.5
44	Upstairs Office	A Wall		Beige	Concrete	0.7
45	Upstairs Storage	C Wall		Beige	Wood	0.0
46	Upstairs Storage	A Wall		Beige	Concrete	0.3
47	Boiler Room	A Wall		Green	Concrete	0.1
48	Boiler Room	C Wall		Green	Concrete	0.1
49	Boiler Room Door	D Wall	D1	Green	Metal	0.4
50	Boiler Room Stairs	D Wall		Green	Concrete	0.2
51	Outside	B Wall		Green	Concrete	0.0
52	Outside	B Wall		Beige	Concrete	0.2
53	Outside	C Wall		Grey	Concrete	0.0
54	Bay Door	Door	C1	White	Metal	-0.1
55	Curb	D Wall		Yellow	Concrete	0.2
56	Column	D	D2	Grey	Concrete	0.0
57	Outside	Door Frame	D1	Grey	Metal	0.0
58	Outside	Door	C2	Beige	Metal	-0.1
59	Outside	C Wall		Grey	Concrete	2.5

XRF Test Number	Location / Room	Component-Designation	Component Number	Color	Substrate	Result/Reading
60	Outside	C Wall		Grey	Concrete	28.4
61	Outside	C Wall	Curb	Yellow	Concrete	0.2
62	Outside	C Wall		Grey	Concrete	33
63	Parking Lot	Stripe		Yellow	Asphalt	0.6
64	Parking Lot	Stripe		Yellow	Asphalt	2.2
65	Parking Lot	Bollard		Yellow	Metal	3.0
66	Parking Lot	Bollard		Yellow	Metal	1.5
67	Parking Lot	Handicap Marking		Blue	Asphalt	0.1
68	Parking Lot	Handicap Marking		Blue	Asphalt	0.1
69	Outside	C Wall		Blue	Concrete	0.3
70	Outside	C Wall		Red	Concrete	5.8
71	Outside	C Wall		Black	Concrete	10.9
72		Cal.			1.1	
73		Cal.			1.1	
74		Cal.			1.0	1.07
75		Cal.			0.1	
76		Cal			0.0	
77		Cal.			0.0	0.03

Appendix C: Photographic Log

Photographic Log
Firestone Auto Center

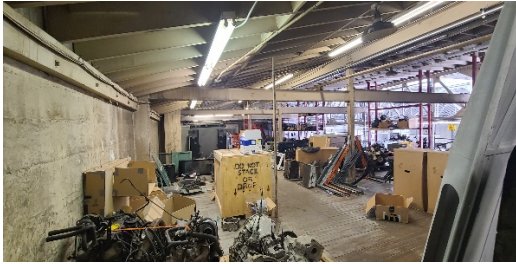


Figure 1 Typical upstairs storage room.



Figure 2 Typical lobby finishes.

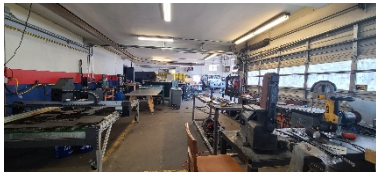


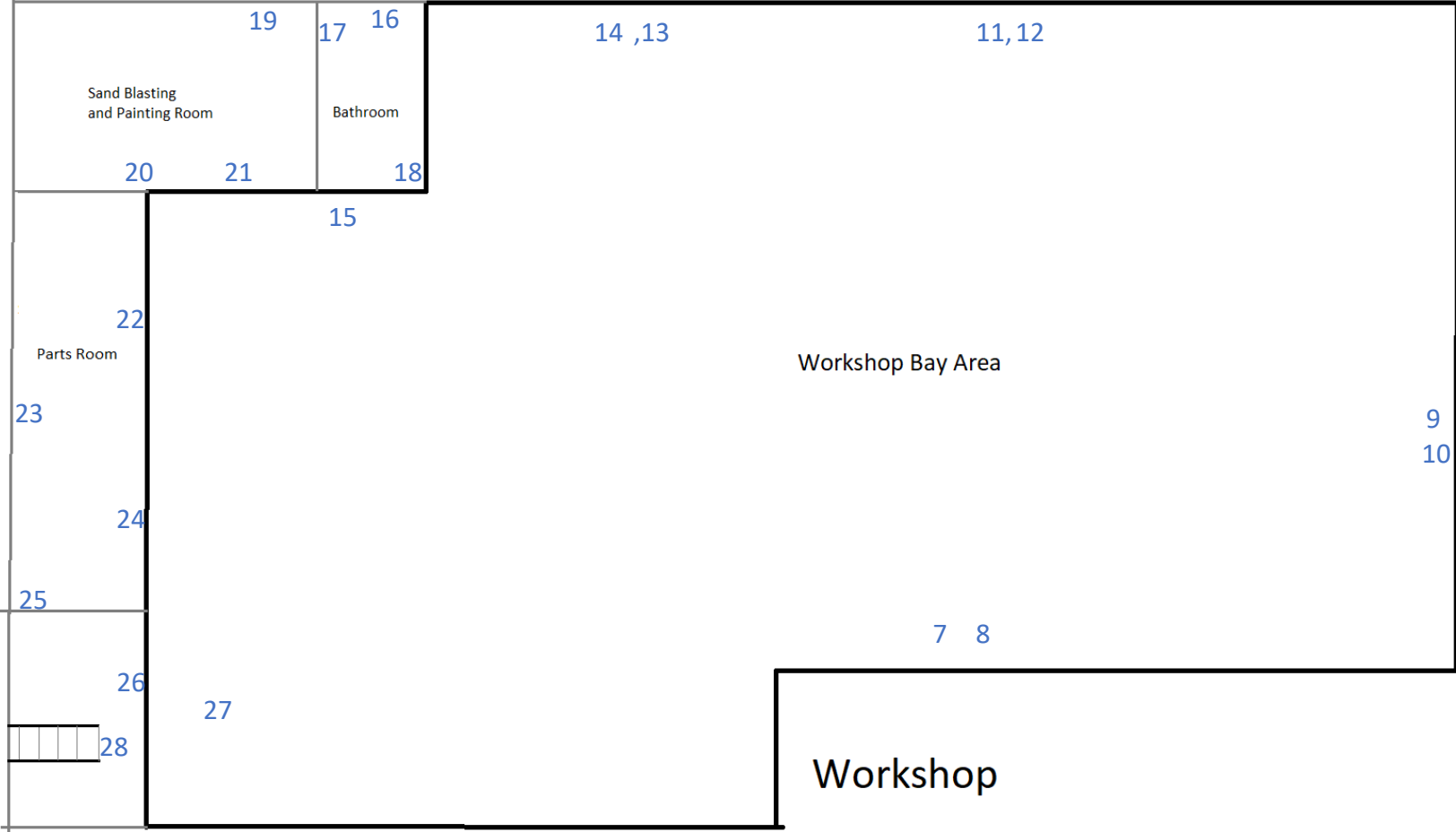
Figure 3 Typical interior service area.



Figure 4 Typical storage room.

Appendix D: Figures

XRF Sample Locations



DC Environmental
PO Box 9315
Albuquerque, NM
87119
505.869.8000

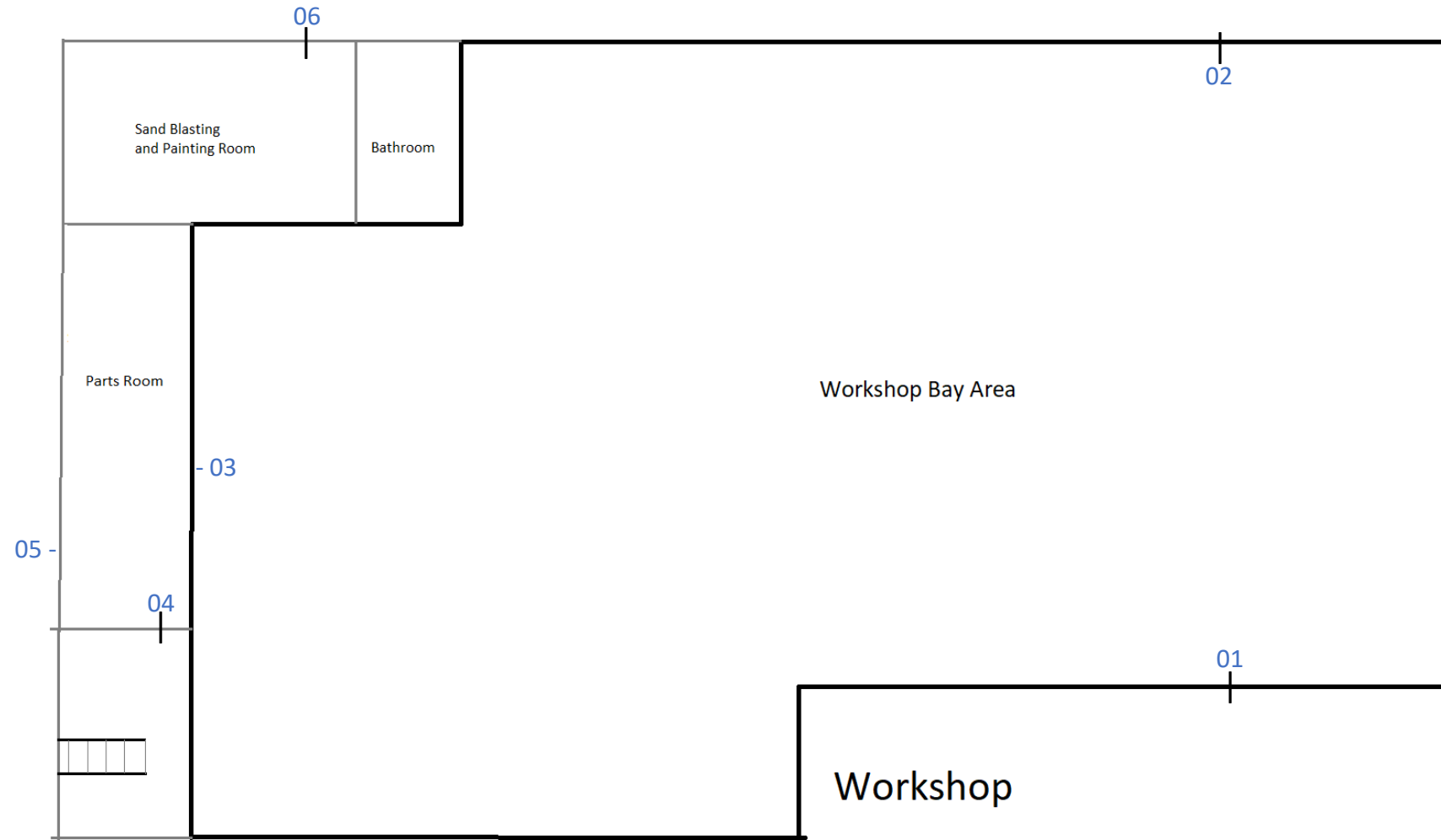
XRF samples:

28

Project Number:
DCE 21-134
Firestone, 701
Central Ave SW

Scale Unknown

PLM Sample Locations



DC Environmental
PO Box 9315
Albuquerque, NM
87119
505.869.8000

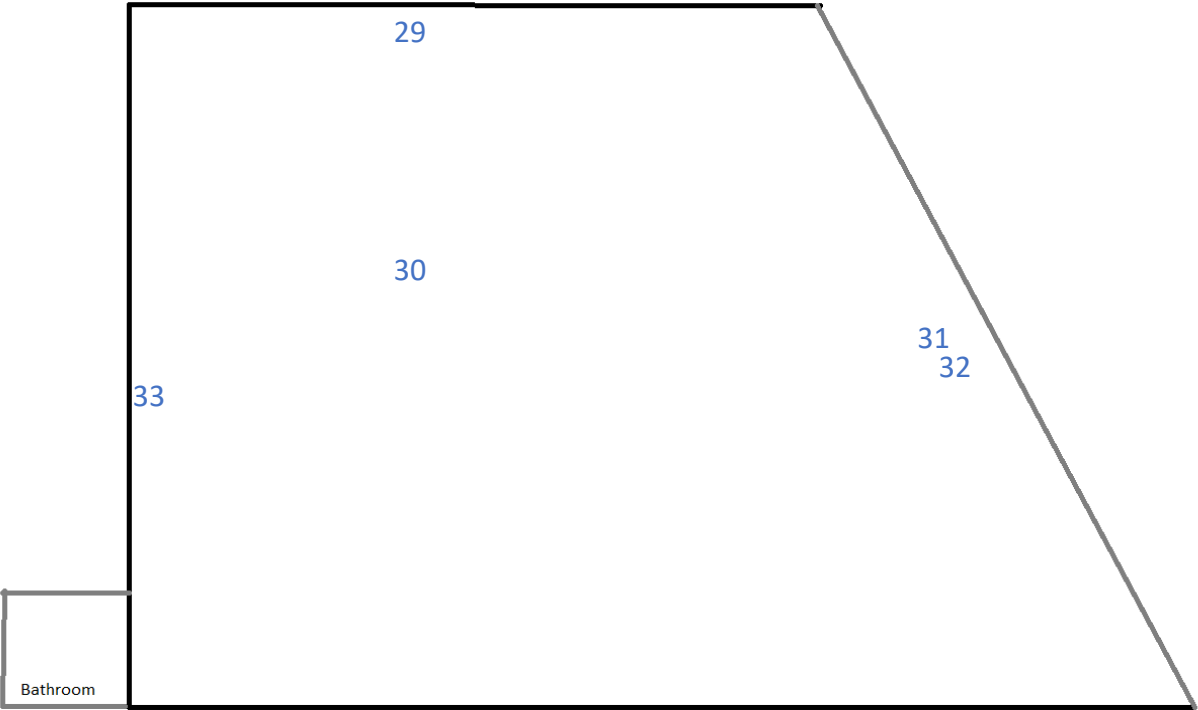
PLM Samples:

06

Project Number:
DCE 21-134
Firestone, 701
Central Ave SW

Scale Unknown

XRF Sample Locations



Lobby



DC Environmental
PO Box 9315
Albuquerque, NM
87119
505.869.8000

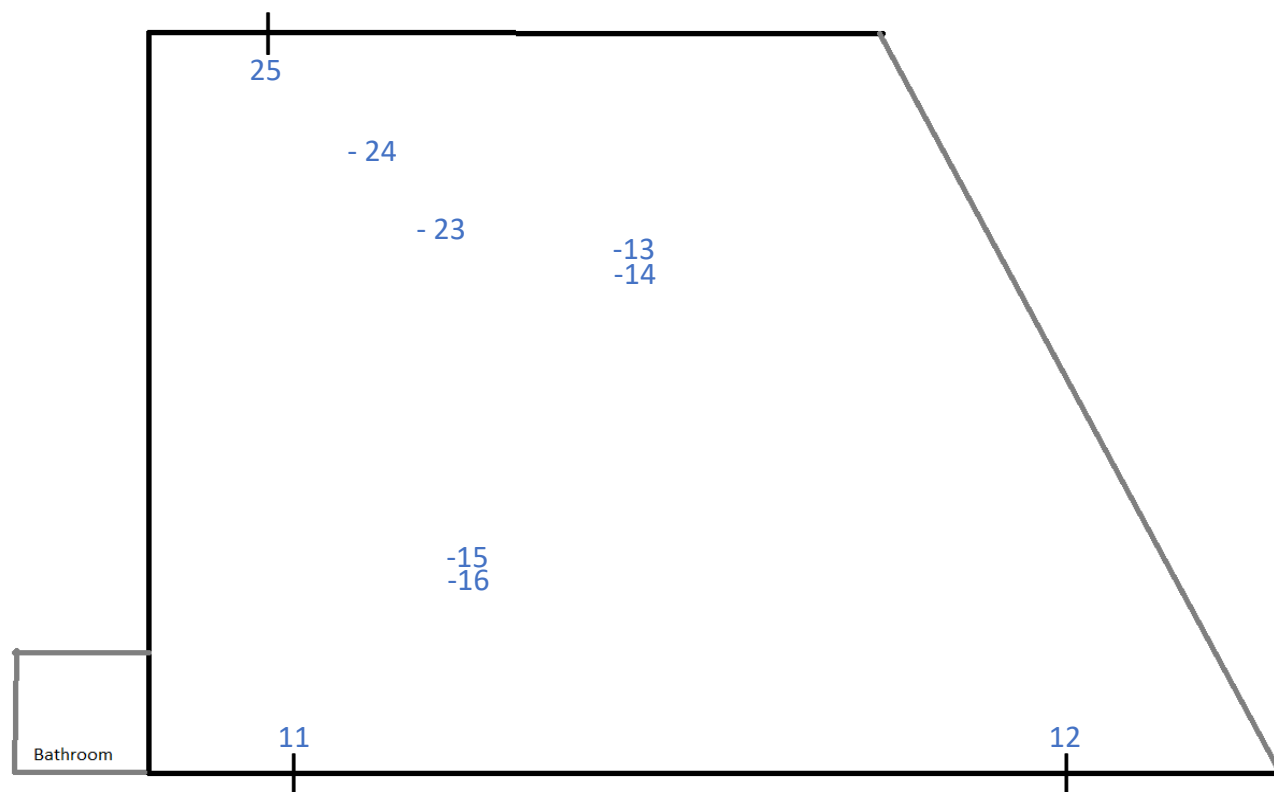
XRF Samples:

33

Project Number:
DCE 21-134
Firestone, 701
Central Ave SW

Scale Unknown

PLM Sample Locations



DC Environmental
PO Box 9315
Albuquerque, NM
87119
505.869.8000

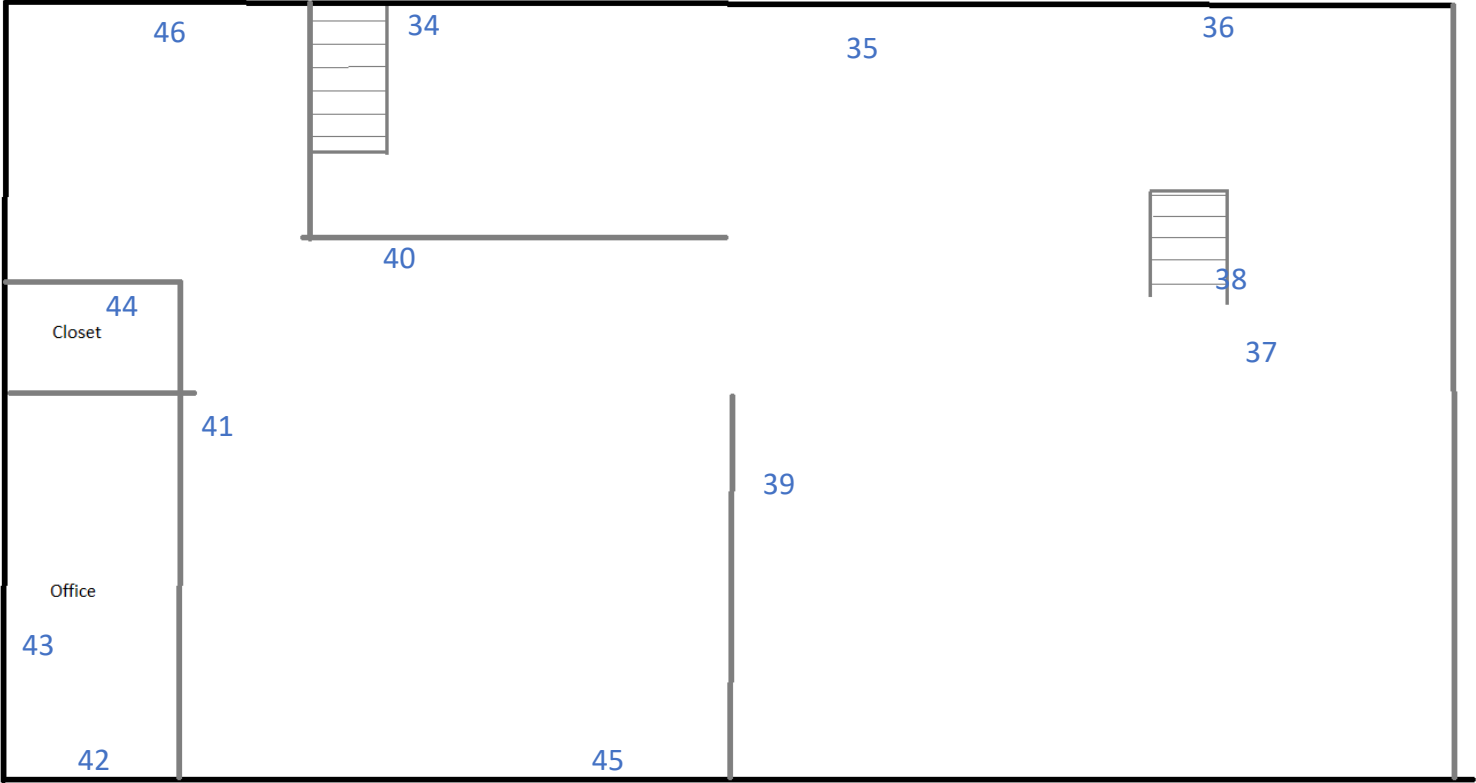
PLM Samples:

25

Project Number:
DCE 21-134
Firestone, 701
Central Ave SW

Scale Unknown

XRF Sample Locations



Upstairs Storage



DC Environmental
PO Box 9315
Albuquerque, NM
87119
505.869.8000

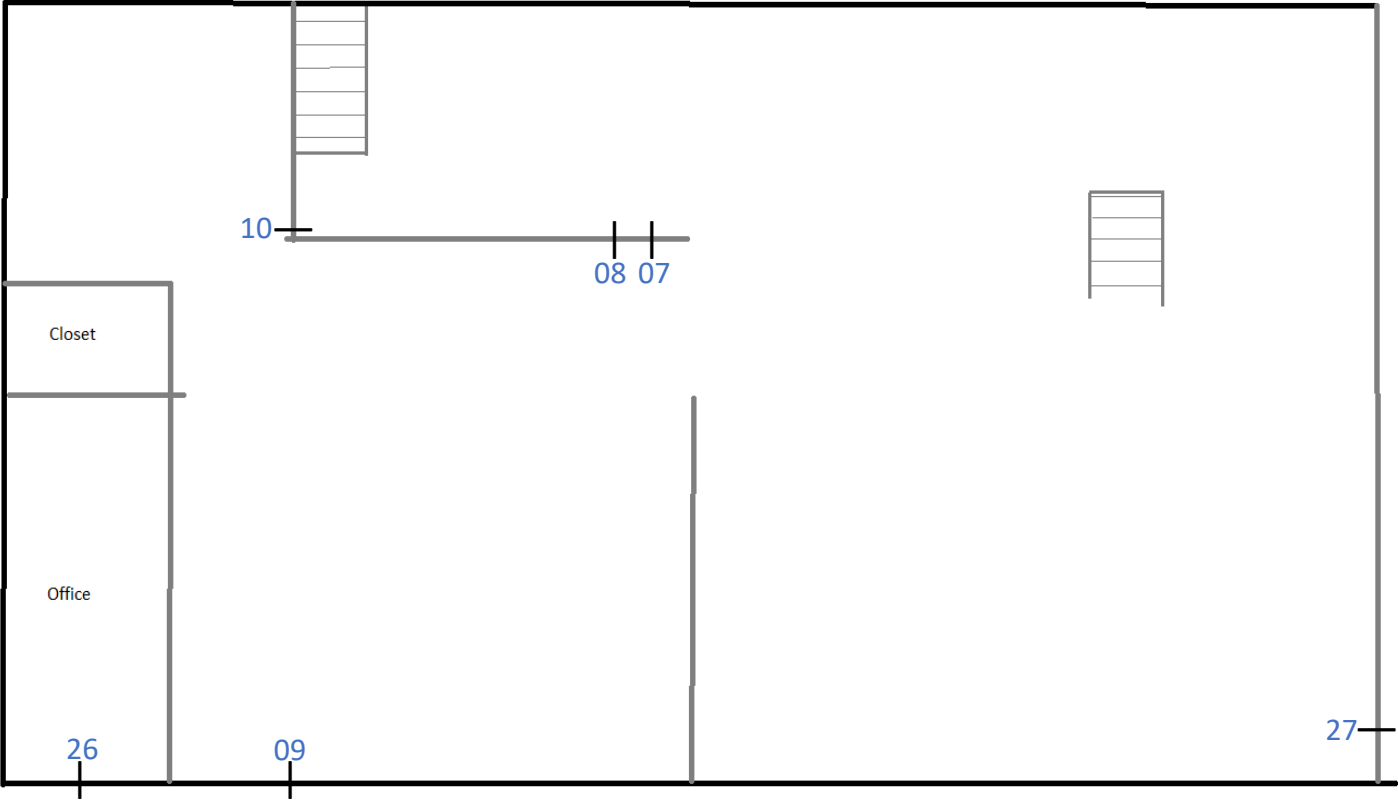
XRF Samples:

46

Project Number:
DCE 21-134
Firestone, 701
Central Ave SW

Scale Unknown

PLM Sample Locations



Upstairs Storage



DC Environmental
PO Box 9315
Albuquerque, NM
87119
505.869.8000

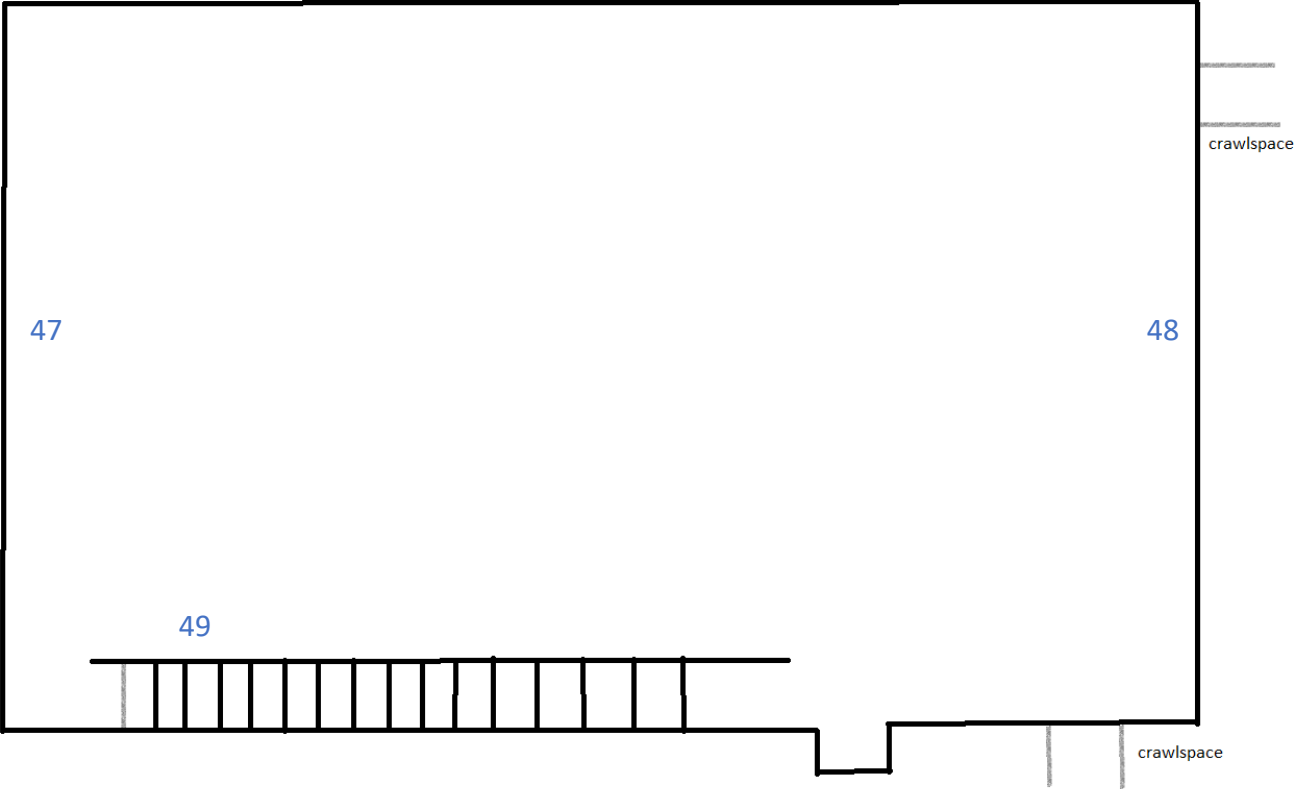
PLM Samples:

27

Project Number:
DCE 21-134
Firestone, 701
Central Ave SW

Scale Unknown

XRF Sample Locations



Basement/Boiler Room



DC Environmental
PO Box 9315
Albuquerque, NM
87119
505.869.8000

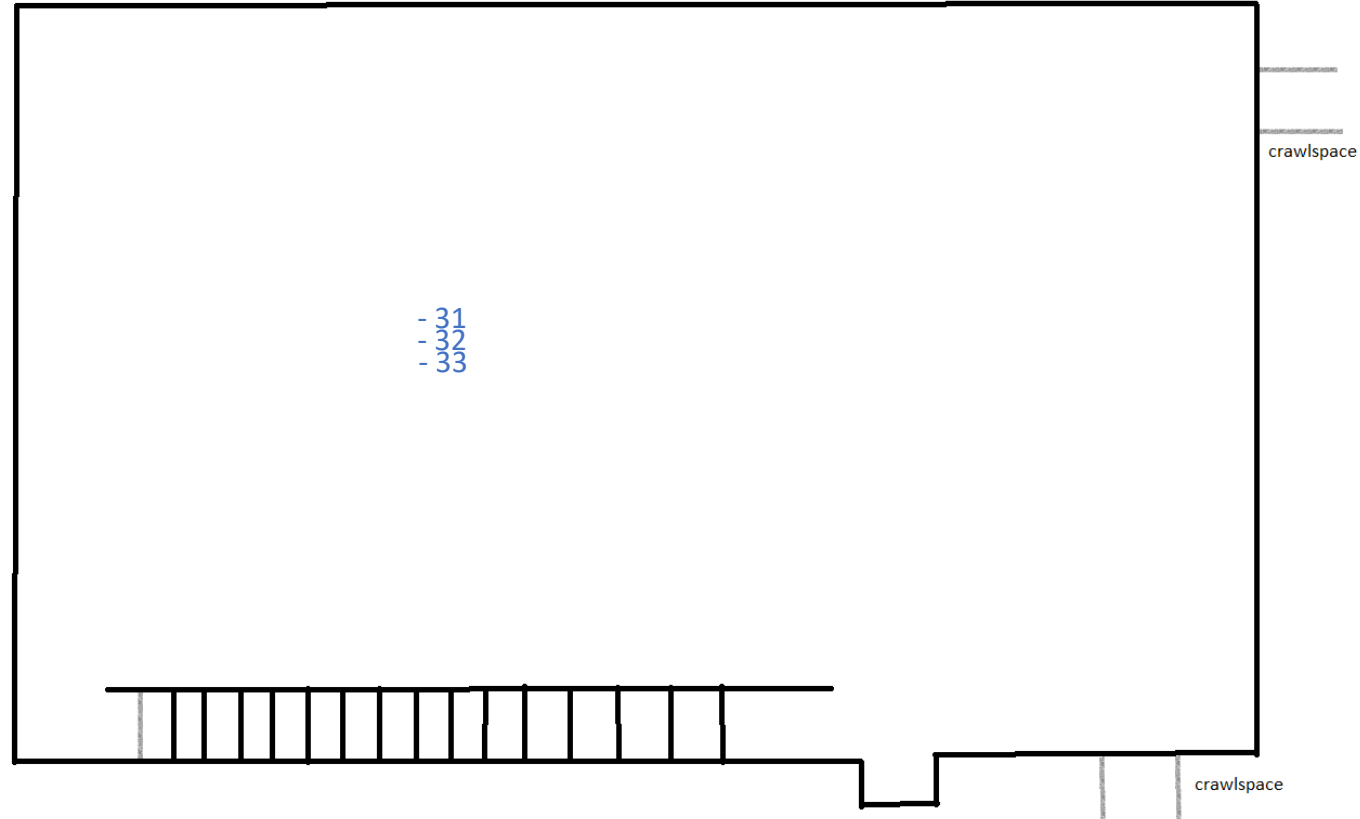
XRF Samples:

49

Project Number:
DCE 21-134
Firestone, 701
Central Ave SW

Scale Unknown

PLM Sample Locations



Basement/Boiler Room



DC Environmental
PO Box 9315
Albuquerque, NM
87119
505.869.8000

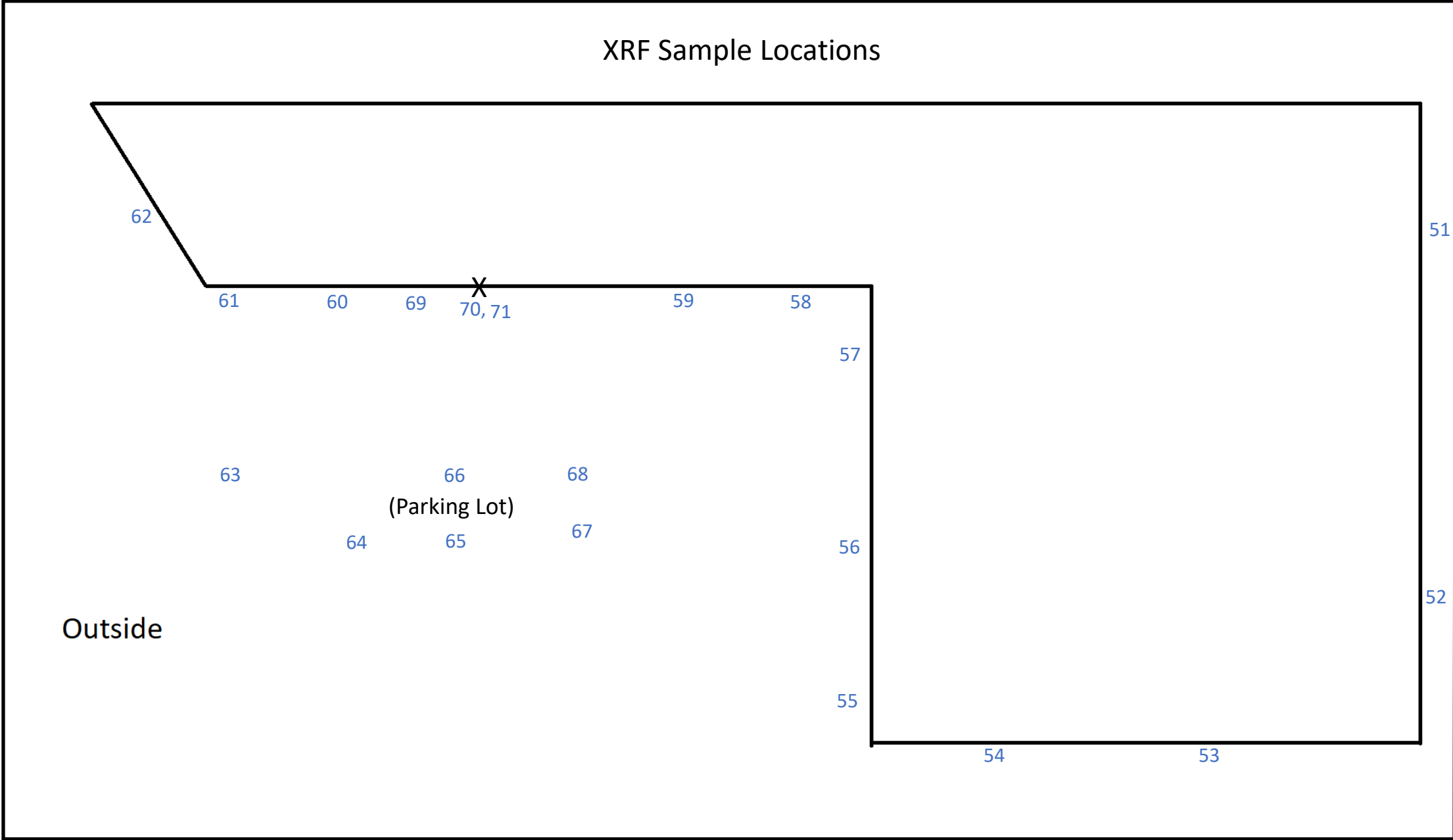
PLM Samples:

- 33

Project Number:
DCE 21-134
Firestone, 701
Central Ave SW

Scale Unknown

XRF Sample Locations



DC Environmental
PO Box 9315
Albuquerque, NM
87119
505.869.8000

XRF Samples:

71

Project Number:
DCE 21-134
Firestone, 701
Central Ave SW

Scale Unknown

PLM Sample Locations



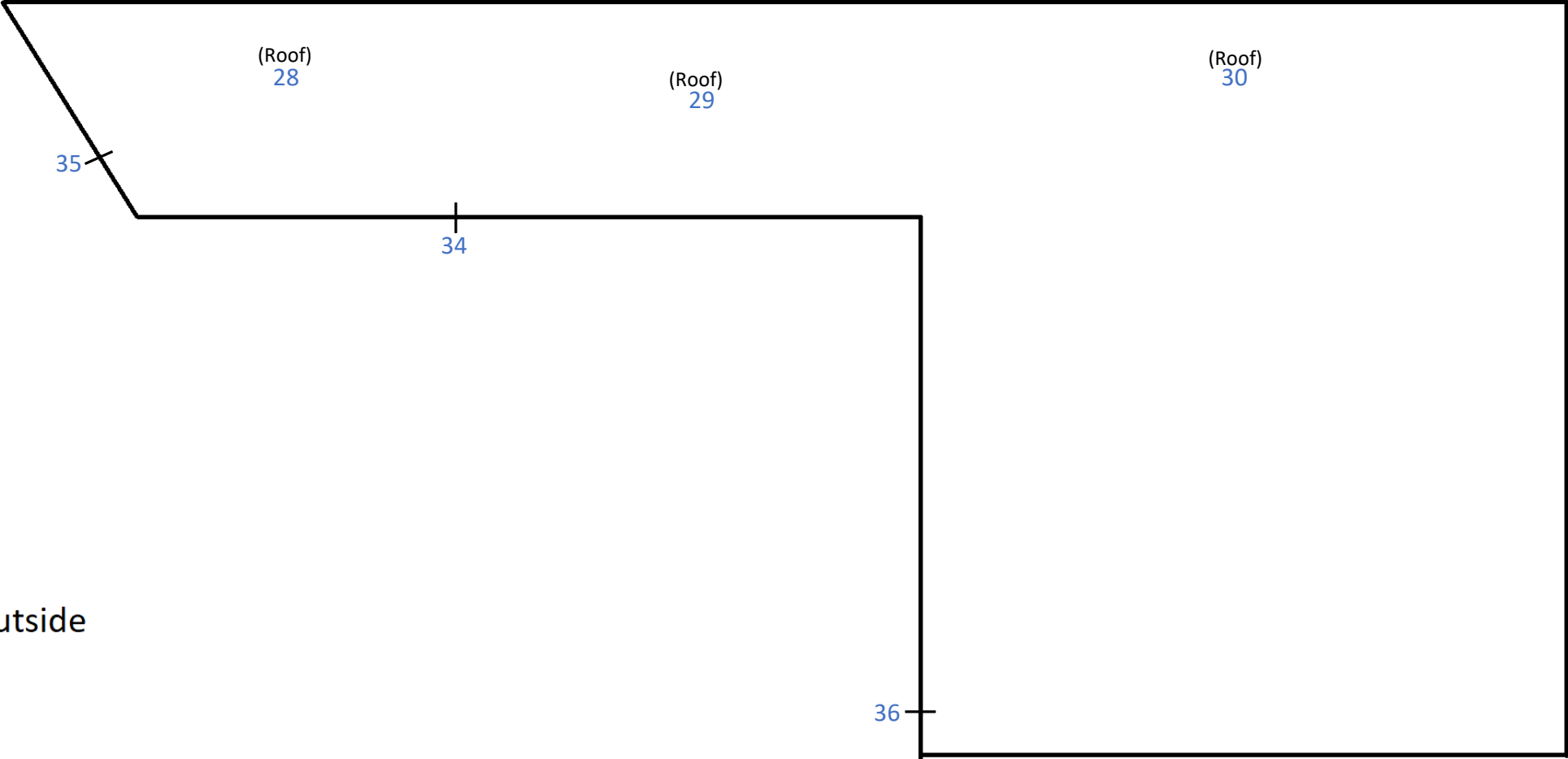
DC Environmental
PO Box 9315
Albuquerque, NM
87119
505.869.8000

PLM Samples:

36

Project Number:
DCE 21-134
Firestone, 701
Central Ave SW

Scale Unknown



Outside

Appendix E: Certifications

CERTIFICATE OF TRAINING

EPA/AHERA Training Program



This is to certify that

JOSE RIVERA

NM. DL. 513 405 766

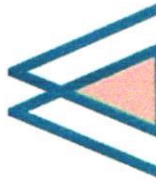
Has completed 4 hours of training and **PASSED** the test required by LAC 33:III.2799, Appendix A;
Section 206 of TSCA Title II and in accordance with LOUISIANA STATE ASBESTOS REGULATIONS entitled,

ASBESTOS BUILDING INSPECTOR REFRESHER

(English)

PRESENTED BY

Mendez Environmental™
1005 Veterans Mem Blvd
Suite, 101
Kenner, LA 70062
Tel: (504) 468-8858



IN COLLABORATION WITH

DC Environmental
P.O. Box 9315
Albuquerque, NM 87119
Tel: (505) 869-8000
www.dcenvironmental.net



Director:

Josefina Mendez-Rosa

NM Program Manager/Instructor:

David Charlesworth

Instructor:

Jeff Biedenbach

Course Date: 02-01-2021

Certificate Number: AS0221KNMJR23225

Test Date: 02-01-2021 Grade: PASS

Expiration Date: 02-01-2022

United States Environmental Protection Agency

This is to certify that



Jim C Calvert

Inspector

has fulfilled the requirements of the Toxic Substances Control Act (TSCA) Section 402, and has received certification to conduct lead-based paint activities pursuant to 40 CFR Part 745.226 as:

In the Jurisdiction of:

All EPA Administered Lead-based Paint Activities Program States, Tribes and Territories

This certification is valid from the date of issuance and expires March 23, 2022

LBP-I-1159552-2

Certification #

February 28, 2019

Issued On



Adrienne Priselac, Manager, Toxics Office
Land Division

Appendix D
Petroleum-Contaminated Soil (PCS) Contingency Plan

Petroleum-Contaminated Soil (PCS) Contingency Plan

During construction, the developer and/or its contractor may remove petroleum contaminated soil (PCS) during site redevelopment activities. The developer and/or contractor will excavate and segregate all potential PCS encountered for further assessment. Potential PCS shall be identified in the field using both visual and olfactory cues. If encountered, the areal extent of potential PCS will be established visually and via use of the heated headspace method for VOC field screening using a hand-held PID. Excavated soil resulting in PID readings in excess of 100 ppm shall be segregated from other excavated soil until further analysis can be performed to determine final disposition. The potential PCS will be placed on plastic, covered with plastic, and bermed in an attempt to prevent potential PCS from cross-contaminating underlying soils and/or to become mobilized by precipitation (storm water) and wind.

Analysis of segregated soil shall be conducted in compliance with NMED Solid Waste Bureau (SWB) regulations as follows: One representative soil sample shall be collected per 100 cubic yards of potentially-impacted soil material exhumed. Upon collection, all representative samples shall be submitted to the contract laboratory, HEAL, for analysis of the following:

- BTEX and MTBE via EPA Method 8021;
- TPH- GRO, - DRO, and - MRO via EPA Method 8015 modified;
- PAHs via EPA Method 8310; and,
- EDB via EPA Method 504.1.

Analytical results obtained from these samples will be further evaluated against applicable SSLs and EPA RSLs to establish TPH levels.

If the presence of PCS is confirmed, the developer and/or its contractor will remove the PCS from the Site for disposal at an approved facility. INTERA has identified both the COA Cerro Colorado Landfill in Albuquerque and the Waste Management Landfill Facility in Rio Rancho as local facilities currently approved to accept PCS. Once a disposal facility is selected based on soil profile acceptance, volume of PCS, and corresponding contaminant concentrations, the PCS will be transported from the Site for disposal.

The developer will submit a VRP completion or status report to the NMED SWB and the VRP to document the excavation, transportation, and disposal of PCS. At a minimum, the report shall include the following:

- Company information performing the excavation and transportation work
- Disposal facility

- Quantity of PCS removed
- Applicable NMSSLs
- Laboratory analytical results
- Shipping manifests (or truck weight tickets)
- Date(s) of work
- Photographs