



COMMONWEALTH of VIRGINIA

DEPARTMENT OF ENVIRONMENTAL QUALITY

TIDEWATER REGIONAL OFFICE

5636 Southern Boulevard, Virginia Beach, Virginia 23462

(757) 518-2000 Fax (757) 518-2009

www.deq.virginia.gov

Matthew J. Strickler
Secretary of Natural Resources

David K. Paylor
Director

Craig R. Nicol
Regional Director

April 12, 2019

SENT VIA EMAIL

bradley_gilliatt@kindermorgan.com

Kinder Morgan Bulk Terminals LLC
1900 Harbor Access Rd.
Newport News, VA 23607
Attn: Mr. Bradley Gilliatt – Terminal Manager

WARNING LETTER

RE: Kinder Morgan Bulk Terminals LLC
Registration No. 60979

Dear Mr. Gilliatt:

The Department of Environmental Quality ("DEQ" or "the Department") has reason to believe that the portable crushing facility may be in violation of the Air Pollution Control Law and Regulations.

This letter addresses conditions at the facility named above, and also cites compliance requirements of the Air Pollution Control Law and Regulations. Pursuant to Va. Code § 10.1-1309 (A) (vi), this letter is not a case decision under the Virginia Administrative Process Act, Va. Code § 2.2-4000 et seq. The Department requests that you respond **within 20 days of the date of this letter.**

OBSERVATIONS AND LEGAL REQUIREMENTS

On April 10, 2019, DEQ received a citizen concern (IR #2019-T-3554) regarding blasting operations at the Kinder Morgan facility located at 1900 Harbor Access Rd, Newport News, VA 23607 ("Facility"). On April 11, 2019, DEQ air staff conducted an on-site investigation to address the citizen concern. A contractor was wet blasting a conveyor that had been previously painted with orange paint, reportedly lead-based. Shrouding was being used and plastic sheeting had been placed directly below the blast area to catch any material that was blasted off the conveyor and falling straight down. According to Kinder Morgan staff, this material would then be collected and taken to an approved landfill for disposal. The following describe the staff's factual observations and identify the applicable legal requirements:

Observation: Shrouding being used at the blasting location on the conveyor was observed to be torn, tattered, and hanging loosely around the point where blasting had taken place. Lead paint chips were observed West – Northwest of the blasting location, to the facilities fence line and onto the nearby road (Harbor Access Rd) approximately 250 ft away.

Legal Requirements: 9VAC5-50-90, states,

“During the construction, modification or operation phase of a stationary source or any other building, structure, facility or installation, no owner or other person shall cause or permit any materials or property to be handled, transported, stored, used, constructed, altered, repaired or demolished without taking reasonable precautions to prevent particulate matter from becoming airborne.”

Va Code § 10.1-1322 (A) states “...Failure to comply with any condition of a permit shall be considered a violation of this chapter....”

ENFORCEMENT AUTHORITY

Va. Code § 10.1-1316 of the Air Pollution Control Law provides for an injunction for any violation of the Air Pollution Control Law, the Air Board regulations, an order, or permit condition, and provides for a civil penalty up to \$32,500 per day of each violation of the Air Pollution Control Law, regulation, order, or permit condition. In addition, Va. Code §§ 10.1-1307 and 10.1-1309 authorizes the Air Pollution Control Board to issue orders to any person to comply with the Air Pollution Control Law and regulations, including the imposition of a civil penalty for violations of up to \$100,000. Also, Va. Code § 10.1-1186 authorizes the Director of DEQ to issue special orders to any person to comply with the Air Pollution Control Law and regulations, and to impose a civil penalty of not more than \$10,000. Va. Code §§ 10.1-1320 and 10.1-1309.1 provide for other additional penalties.

The Court has the inherent authority to enforce its injunction, and is authorized to award the Commonwealth its attorneys' fees and costs.

FUTURE ACTIONS

After reviewing this letter, please respond in writing to DEQ **within 20 days of the date of this letter** detailing actions you have taken or will be taking to ensure compliance with state law and regulations. If corrective action will take longer than 90 days to complete, you may be asked to sign a Letter of Agreement or enter into a Consent Order with the Department to formalize the plan and schedule. *It is DEQ policy that appropriate, timely, corrective action undertaken in response to a Warning Letter will avoid adversarial enforcement proceedings and the assessment of civil charges or penalties.*

Please advise us if you dispute any of the observations recited herein or if there is other information of which DEQ should be aware. In the event that discussions with staff do not lead to a satisfactory conclusion concerning the contents of this letter, you may elect to participate in DEQ's Process for Early Dispute Resolution. If you complete the Process for Early Dispute Resolution and are not satisfied with the resolution, you may request in writing that DEQ take all necessary steps to issue a case decision where appropriate. For further information on the Process for Early Dispute Resolution, please visit the Department's website under “Laws & Regulations” and “DEQ regulations” at:

Warning Letter
April 12, 2019
Page 3 of 3

http://www.deq.virginia.gov/regulations/pdf/Process_for_Early_Dispute_Resolution_8260532.pdf or ask the DEQ contact listed below.

I will be your contact at DEQ in this matter. Please direct written materials to my attention. If you have questions or wish to arrange a meeting, you may reach me directly at (757) 518-2186 or matthew.slemp@deq.virginia.gov.

Sincerely,

A handwritten signature in black ink, appearing to read 'Matthew Slemp', with a large, stylized loop at the end.

Matthew Slemp
Air Compliance Inspector

Enc: Inspection Report

cc: John M. Brandt, Regional Air Compliance, Monitoring and Enforcement Manager



Tidewater Regional Office
5636 Southern Boulevard, Virginia Beach, VA 23462

Phone #: (757) 518-2000

Registration #: 60979

Report #: 323542

Site Name: Kinder Morgan Bulk Terminals - Pier IX

CMS: N/A

Address: 1900 Harbor Access Rd, Newport News, VA 23607

Classification: Synthetic Minor

Contacts: Joshua Miles: (757) 928-1545

Bradley Gilliat: (757) 928-1520

AIR INSPECTION REPORT

The purpose of this inspection report is to document DEQ's observations and provide the compliance status for requirements applicable to the facility. Presented below are the following:

- **Inspection Details** describe this inspection report
- **Compliance Summary** lists individual requirements addressed in the report
- **Inspection Summary** provides an overview of the inspector's observations
- **Inspection Checklist** provides additional details and individual observations related to specific requirements

Inspection Details

Inspection Date: Apr 11, 2019
Reason: Complaint Investigation (on-site)
Type: PCE With Site Visit
Inspector: Matthew Slomp
Inspection Results: Out of Compliance

| Program Code | Subpart |
|--------------|---------|
| SIP | |

| Visit Date | Arrival Time | Departure Time | Weather |
|------------|--------------|----------------|---------------------------|
| 4/11/2019 | 09:00 AM | 09:45 AM | 58F, Sunny, Wind 8 mph NE |

Approvals

John M Brandt
April 12, 2019

Inspector: Matthew Slomp
Signed Date: Apr 12, 2019

Supervisor: John Brandt

Compliance Summary

Out of Compliance The applicable requirements listed in the table below were confirmed during the inspection to be out of compliance.

| Permit Effective Date or Regulation | Applicable Requirement |
|-------------------------------------|------------------------|
| | |

Inspection Summary

I conducted a citizen concern investigation today in response to IR 2019-T-3554 received on April 10, 2019 by TRO PREP for the Kinder Morgan – Pier IX facility in Newport News (Registration #60979) regarding abrasive blasting of a lead painted surface. I met with the terminal manager who escorted me to the location of the blasting operations. He explained the contractors are using "wet blasting" (water mixed with abrasive material) techniques to remove lead paint from one of the conveyors so it can be repainted. The wet blasting mixture also included a product called BlastOx which is supposed to stabilize heavy metals through pH adjustment, chemical reactions, and encapsulation. The spent abrasive waste can be tested to classify the waste as non-hazardous once blasted and can be disposed of in a landfill. The conveyor was painted orange, so the material being blasted off the conveyor is easily identifiable. Plastic sheeting was placed below the conveyor so all material dripping or being dropped straight down from the conveyor could be caught for disposal. The terminal manager stated the contractor had completely enclosed the lower portion of the conveyor with the shroud while it was being blasted; however, as they moved up the conveyor to continue blasting they stopped securing the shroud. The shroud being used was torn, tattered, and hanging loosely on the conveyor where the blasting would've been taking place; no blasting was being conducted while I was on site (blasting on the conveyor had been completed). It was obvious after walking around the conveyor, the ground around the lower portion of the conveyor was "clean" and the ground W-NW of the upper portion of the conveyor was covered in orange paint flakes (ranging in size of a golf ball to a grain of sand). The larger flakes of paint were closest to the conveyor and became smaller as they neared the facilities fence line which borders Harbor Access Rd. I found orange paint flakes to the fence line and onto Harbor Access Rd; from the abrasive blasting location to the fence line is approximately 250 ft W-NW. I have attached a site map to indicate the approximate area affected. The terminal manager did state he noticed the winds shift East on April 10, 2019, (around mid-morning) while crews were blasting he requested they shutdown 2 of the 3 units blasting at that time which were operating at locations higher on the conveyor and more susceptible to cause excess emissions caused by wind.

A Warning Letter is being issued to address the lack of particulate control during blasting.

Recommendations:

Notify DEQ the next time blasting is anticipated to start so DEQ can inspect shrouding and blast set up before blasting begins.

Attachments:

SGS analytical results from testing blast material, including chain of custody's and sample forms;
Site map of approximate affected area;
Warning Letter.

Inspection Checklist

Effective Date:

Applicable Requirement #:

Compliance Status: **Out of Compliance**

Applicable Requirement

9VAC5-50-90 - "During the construction, modification or operation phase of a stationary source or any other building, structure, facility or installation, no owner or other person shall cause or permit any materials or property to be handled, transported, stored, used, constructed, altered, repaired or demolished without taking reasonable precautions to prevent particulate matter from becoming airborne."

Observation

Orange paint flakes from blasting operations were observed approximately 250 ft from the blast location and paint flakes were observed beyond the facilities fence line onto the nearby road (Harbor Access Rd).

SGS

GALSON

Mr. James Poesl
JCP Technical Services, LLC
4 Hillman Road
New City, NY 10956

October 17, 2018

DOH ELAP #11626
AIHA-LAP #100324

Account# 25434

Login# L459493

Dear Mr. Poesl:

Enclosed are the analytical results for the samples received by our laboratory on October 12, 2018. All test results meet the quality control requirements of AIHA-LAP and NELAC unless otherwise stated in this report. All samples on the chain of custody were received in good condition unless otherwise noted.

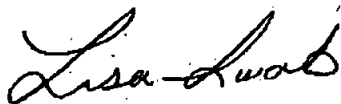
Results in this report are based on the sampling data provided by the client and refer only to the samples as they were received at the laboratory. When possible, non-IOM samples will be retained for 14 days following the date of this report (unless an extension is specifically requested). IOM samples are retained for 7 days.

Current Scopes of Accreditation can be viewed at www.sgsgalson.com in the accreditations section of the "About" page.

Please contact Joanne White at (888)-432-5227, if you would like any additional information regarding this report. Thank you for using SGS Galson.

Sincerely,

SGS Galson



Lisa Swab
Laboratory Director

Enclosure(s)

SGS

GALSON

LABORATORY ANALYSIS REPORT

6601 Kirkville Road
East Syracuse, NY 13057
(315) 432-5227
FAX: (315) 437-0571
www.sgsgalson.com

Client : JCP Technical Services, LLC
Site : 221 Terminal Drive, Arlington

Account No.: 25434
Login No.: L459493

Date Sampled : 02-OCT-18
Date Received : 12-OCT-18

Date Analyzed : 15-OCT-18
Report ID : 1096462

Lead

| <u>Sample-ID</u> | <u>Lab-ID</u> | <u>Air Vol</u> <u>liter</u> | <u>Total</u> <u>ug</u> | <u>Conc</u> <u>mg/m3</u> |
|------------------|---------------|--------------------------------|---------------------------|-----------------------------|
| 18-0299299 | L459493-1 | 180 | <0.38 | <0.0021 |
| 18-0299300 | L459493-2 | 180 | 5.2 | 0.029 |
| 18-0299301 | L459493-3 | NA | <0.38 | NA |

COMMENTS: Please see attached lab footnote report for any applicable footnotes.

| | | |
|--|---------------------------|-------------------|
| Level of quantitation: 0.38 ug | Submitted by: JMR/SJW/KEG | Approved by: JJL |
| Analytical Method : mod. NIOSH 7303/mod. OSHA ID-125G; ICP | Date : 17-OCT-18 | NYS DOH # : 11626 |
| Collection Media : MCE UW 37mm | Supervisor : KEG | QC by : JJL |

| | | | | | |
|-----------------|----------------|------------------|-------------------|------------------------|------------------|
| < -Less Than | mg -Milligrams | m3 -Cubic Meters | kg -Kilograms | NA -Not Applicable | ND -Not Detected |
| > -Greater Than | ug -Micrograms | L -Liters | NS -Not Specified | ppm -Parts per Million | |



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LABORATORY FOOTNOTE REPORT

6601 Kirkville Road
East Syracuse, NY 13057
(315) 432-5227
FAX: (315) 437-0571
www.sgsgalson.com

Client Name : JCP Technical Services, LLC
Site : 221 Terminal Drive, Arlington

Date Sampled : 02-OCT-18
Date Received: 12-OCT-18
Date Analyzed: 15-OCT-18

Account No.: 25434
Login No. : L459493

This document is issued by the Company under its General Conditions of Service accessible at <http://www.sgs.com/en/Terms-and-Conditions.aspx>. Attention is drawn to the limitation of liability, indemnification and jurisdiction issues defined therein.

Any holder of this document is advised that information contained herein reflects the Company's findings at the time of its intervention only and within the limits of Client's instructions, if any. The Company's sole responsibility is to its Client and this document does not exonerate parties to a transaction from exercising all their rights and obligations under the transaction documents. Any unauthorized alteration, forgery or falsification of the content or appearance of this document is unlawful and offenders may be prosecuted to the fullest extent of the law.

Unless otherwise noted below, all quality control results associated with the samples were within established control limits or did not impact reported results.

Note: The findings recorded within this report were drawn from analysis of the sample(s) provided to the laboratory by the Client (or a third party acting at the Client's direction). The laboratory does not have control over the sampling process, including but not limited to the use of field equipment and collection media, as well as the sampling duration, collection volume or any other collection parameter used by the Client. The findings herein constitute no warranty of the sample's representativeness of any sampled environment, and strictly relate to the samples as they were presented to the laboratory. For recommended sampling collection parameters, please refer to the Sampling and Analysis Guide at www.sgsgalson.com

Unrounded results are carried through the calculations that yield the final result and the final result is rounded to the number of significant figures appropriate to the accuracy of the analytical method. Please note that results appearing in the columns preceeding the final result column may have been rounded and therefore, if carried through the calculations, may not yield an identical final result to the one reported.

The stated LOQs for each analyte represent the demonstrated LOQ concentrations prior to correction for desorption efficiency (if applicable).

Unless otherwise noted below, reported results have not been blank corrected for any field blank or method blank.

L459493 (Report ID: 1096462):

Reported results reflect elemental analysis of the requested metals. Certain compounds may not be solubilized during digestion, resulting in data that is biased low.

SOPs: MT-SOP-27(1), MT-SOP-29(3)

| | | | | | |
|-----------------|----------------|------------------|-------------------|------------------------|--------------------|
| < -Less Than | mg -Milligrams | m3 -Cubic Meters | kg -Kilograms | ppm -Parts per Million | |
| > -Greater Than | ug -Micrograms | l -Liters | NS -Not Specified | ND -Not Detected | NA -Not Applicable |



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LABORATORY FOOTNOTE REPORT

6601 Kirkville Road
East Syracuse, NY 13057
(315) 432-5227
FAX: (315) 437-0571
www.sgsgalson.com

Client Name : JCP Technical Services, LLC
Site : 221 Terminal Drive, Arlington

Date Sampled : 02-OCT-18
Date Received: 12-OCT-18
Date Analyzed: 15-OCT-18

Account No.: 25434
Login No.: L459493

L459493 (Report ID: 1096462):

Accuracy and mean recovery data presented below is based on a 95% confidence interval (k=2). The estimated accuracy applies to the media, technology, and SOP referenced in this report and does not account for the uncertainty associated with the sampling process. The accuracy is based solely on spike recovery data from internal quality control samples. Where N/A appears below, insufficient data is available to provide statistical accuracy and mean recovery values for the associated analyte.

| Parameter | Accuracy | Mean Recovery |
|-----------|----------|---------------|
| Lead | +/-8.1% | 99.2% |

| | | | | | |
|-----------------|----------------|------------------|-------------------|------------------------|--------------------|
| < -Less Than | mg -Milligrams | m3 -Cubic Meters | kg -Kilograms | ppm -Parts per Million | |
| > -Greater Than | ug -Micrograms | l -Liters | NS -Not Specified | ND -Not Detected | NA -Not Applicable |

783206531930

Date: 10/12/18

Shipper: FEDEX

Initials: MAK



Prep: UNKNOWN

1459493

GALSON CHAIN OF CUSTODY

| | | |
|-------------------------------------|------------------|------|
| <input checked="" type="checkbox"/> | Standard | 0% |
| <input type="checkbox"/> | 4 Business Days | 35% |
| <input type="checkbox"/> | 3 Business Days | 50% |
| <input type="checkbox"/> | 2 Business Days | 75% |
| <input type="checkbox"/> | Next Day by 6pm | 100% |
| <input type="checkbox"/> | Next Day by Noon | 150% |
| <input type="checkbox"/> | Same Day | 200% |

☒ Samples submitted using the FreePumpLoan™ Program
☐ Samples submitted using the FreeSamplingBadges™ Program

Client Acct No.: 25434
 Company Name: JCP Technical Services, LLC
 Address 1: 4 Hillman Road
 Address 2:
 City, State Zip: New City, NY 10956
 Phone No.: 732 - 261 - 8844
 Cell No.:
 Email reports to: jimejcp@technical.com, skylander52@mac.com
 Comments:
 Online COC No.: 164388

Report To: Mr. James Poehl
 Company Name: JCP Technical Services, LLC
 Address 1: 4 Hillman Road
 Address 2:
 City, State Zip: New City, NY 10956
 Phone No.: 732 - 261 - 8844
 Cell No.:
 Email reports to: jimejcp@technical.com, skylander52@mac.com
 Comments:

Invoice To: Mr. James Poehl
 Company Name: JCP Technical Services, LLC
 Address 1: 4 Hillman Road
 Address 2:
 City, State Zip: New City, NY 10956
 Phone No.:
 Email Address: jimejcp@technical.com, skylander52@mac.com
 Comments:
 P.O. No.:
 Payment info.: ☒ I will call SGS Galson to provide credit card info
☐ Card on File (enter the last five digits on the line below)

Comments:

Abrasive Blast 2 samples, 1 Field Blank

Site Name: 221 Terminal Drive, Arlington
 Project:

Sampled By: Frank Leja

State Sampled: Illinois
 List description of industry or Process/interferences present in sampling area: Industrial Painting

| Sample ID (Maximum of 20 Characters) | Date Sampled | Collection Medium | Sample Volume Sample Time Sample Area | Liters Minutes In ² , cm ² , ft ² | Analysis Requested | Method Reference ^ | Hexavalent Chromium Process (e.g., welding, plating, painting, etc.) |
|---|--------------|-------------------|---|--|--------------------|--|--|
| 18-0299299 | 10/2/2018 | 37mm UW MCE, 3pc | 180 | L | Lead | mod. NIOSH 7303/mod. OSHA ID-125G; ICP | Per client ICP for all. KLD 10/12/18 |
| 18-0299300 | 10/2/2018 | Lead | 180 | L | Lead | Niosh 7303 | |
| 18-0299301 | 10/2/2018 | 37mm UW MCE, 3pc | N/A (BLANK) | N/A | Lead | mod NIOSH 7303/mod OSHA ID-125G; ICP/MS | |

☐ ^ If the method(s) indicated on the COC are not our routine/preferred method(s), we will substitute our routine/preferred methods. If this is not acceptable, check here to have us contact you.

| Chain of Custody | Print Name / Signature | Date | Time | Print Name / Signature | Date | Time |
|---|------------------------|------------|------|------------------------|----------|------|
| Relinquished By: James Poehl | | 10/11/2018 | | | 10/11/18 | |
| Relinquished By: | | | | | 10/12/18 | 1231 |
| Samples received after 3pm will be considered as next day's | | | | | | |
| Michelle Krause | | | | | | |
| Prep No.: PSY498448 Account No.: 25434 Finalized: 10/11/2018 3:07:47 PM | | | | | | |

All services are rendered in accordance with the applicable SGS General Conditions of Service accessible via: <http://www.sgs.com/en/Terms-and-Conditions.aspx>



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CHAIN OF CUSTODY

| | | | | | | | |
|---|--------------|-------------------|---|--|--------------------|-------------------------------|--|
| Comments : | | | | | | | |
| Sample ID (Maximum of 20 Characters) | Date Sampled | Collection Medium | Sample Volume Sample Time Sample Area | Liters Minutes in ² , cm ² , ft ² | Analysis Requested | Method Reference ^A | Hexavalent Chromium Process (e.g., welding, plating, painting, etc.) |

| | | | | | | | |
|--|------------------------|------------|------|---------------|------------------------|------------|------|
| <input type="checkbox"/> ^A If the method(s) indicated on the COC are not our routine/preferred method(s), we will substitute our routine/preferred methods. If this is not acceptable, check here to have us contact you. | | | | | | | |
| Chain of Custody | Print Name / Signature | Date | Time | Received By : | Print Name / Signature | Date | Time |
| Relinquished By : | James poos1 | 10/11/2018 | | | Michelle Krause | 10/11/2018 | 1231 |
| Relinquished By : | | | | | | | |
| Samples received after 3pm will be considered as next day's business. | | | | | | | |
| Onfile COC No. : 164388 Prep No. : PSY498448 Account No. : 25434 Finalized : 10/11/2018 3:07:47 PM | | | | | | | |
| All services are rendered in accordance with the applicable SGS General Conditions of Service accessible via: http://www.sgs.com/en/Terms-and-Conditions.aspx | | | | | | | |

SGS

GALSON

Mr. James Poesl
JCP Technical Services, LLC
13 Fox Hill Road
Chestnut Ridge, NY 10977

June 09, 2017

DOH ELAP #11626
AIHA-LAP #100324

Account# 25434

Login# L409069

Dear Mr. Poesl:

Enclosed are the analytical results for the samples received by our laboratory on June 08, 2017. All test results meet the quality control requirements of AIHA-LAP and NELAC unless otherwise stated in this report. All samples on the chain of custody were received in good condition unless otherwise noted.


Results in this report are based on the sampling data provided by the client and refer only to the samples as they were received at the laboratory. Unless otherwise requested, all samples will be discarded 14 days from the date of this report, with the exception of IOMs, which will be cleaned and disposed of after seven calendar days.

Current Scopes of Accreditation can be viewed at www.galsonlabs.com in the accreditations section under the "about Galson" tab.

Please contact Joanne White at (888)-432-5227, if you would like any additional information regarding this report. Thank you for using SGS Galson Laboratories.

Sincerely,

SGS Galson Laboratories



Lisa Swab
Laboratory Director

Enclosure(s)

Galson Laboratories, Inc. is now a part of SGS, the world's leading inspection, verification, testing, and certification company. As part of our transition to SGS, you will begin to see some formatting changes with reports that will improve the presentation of data and allow for the transition to the new logo.

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LABORATORY ANALYSIS REPORT

6601 Kirkville Road
East Syracuse, NY 13057
(315) 432-5227
FAX: (315) 437-0571
www.galsonlabs.com

Client : JCP Technical Services, LLC
Site : P66 Domestic Trades
Date Sampled : 07-JUN-17
Date Received : 08-JUN-17
Account No.: 25434
Login No. : L409069
Date Analyzed : 08-JUN-17
Report ID : 1000774

Lead

| Sample ID | Lab ID | Air Vol liter | Total ug | Conc mg/m3 |
|-----------|-----------|------------------|-------------|---------------|
| 428468-22 | L409069-1 | 1014.9 | 2.4 | 0.0024 |
| 428468-14 | L409069-2 | 1055.7 | 2.3 | 0.0021 |
| 428468-8 | L409069-3 | 994.5 | 7.5 | 0.0075 |
| 428468-9 | L409069-4 | 1004.7 | 6.5 | 0.0065 |
| 428468-19 | L409069-5 | NA | <0.38 | NA |

COMMENTS: Please see attached lab footnote report for any applicable footnotes.

| | | | | | |
|--|-----------------------|------------------|-------------------|------------------------|------------------|
| Level of quantitation: 0.38 ug | Submitted by: JMR/JPA | | | | |
| Analytical Method : mod. NIOSH 7300/mod. OSHA ID-125G; ICP | Approved by : SJW | | | | |
| OSHA PEL : 0.05 mg/m3 (TWA) | Date : 09-JUN-17 | | | | |
| Collection Media : MCE UW 37mm | Supervisor: KEG | | | | |
| | NYS DOH # : 11626 | | | | |
| | QC by: NDC | | | | |
| < -Less Than | mg -Milligrams | m3 -Cubic Meters | kg -Kilograms | NA -Not Applicable | ND -Not Detected |
| > -Greater Than | ug -Micrograms | l -Liters | NS -Not Specified | ppm -Parts per Million | |



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LABORATORY FOOTNOTE REPORT

6601 Kirkville Road
East Syracuse, NY 13057
(315) 432-5227
FAX: (315) 437-0571
www.galsonlabs.com

Client Name : JCP Technical Services, LLC
Site : P66 Domestic Trades

Date Sampled : 07-JUN-17
Date Received: 08-JUN-17
Date Analyzed: 08-JUN-17

Account No.: 25434
Login No. : L409069

This document is issued by the Company under its General Conditions of Service accessible at <http://www.sgs.com/en/Terms-and-Conditions.aspx>. Attention is drawn to the limitation of liability, indemnification and jurisdiction issues defined therein.

Any holder of this document is advised that information contained herein reflects the Company's findings at the time of its intervention only and within the limits of Client's instructions, if any. The Company's sole responsibility is to its Client and this document does not exonerate parties to a transaction from exercising all their rights and obligations under the transaction documents. Any unauthorized alteration, forgery or falsification of the content or appearance of this document is unlawful and offenders may be prosecuted to the fullest extent of the law.

Unless otherwise noted below, all quality control results associated with the samples were within established control limits or did not impact reported results.

Note: The findings recorded within this report were drawn from analysis of the sample(s) provided to the laboratory by the Client (or a third party acting at the Client's direction). The laboratory does not have control over the sampling process. The findings herein constitute no warranty of the samples' representativeness of any sampled environment and strictly relate to the samples as they were presented to the laboratory.

Unrounded results are carried through the calculations that yield the final result and the final result is rounded to the number of significant figures appropriate to the accuracy of the analytical method. Please note that results appearing in the columns preceding the final result column may have been rounded and therefore, if carried through the calculations, may not yield an identical final result to the one reported.

The stated LOQs for each analyte represent the demonstrated LOQ concentrations prior to correction for desorption efficiency (if applicable).

Unless otherwise noted below, reported results have not been blank corrected for any field blank or method blank.

L409069 (Report ID: 1000774):

Reported results reflect elemental analysis of the requested metals. Certain compounds may not be solubilized during digestion, resulting in data that is biased low.

SOPs: MT-SOP-9(32), im-mwvfilt(28)

L409069 (Report ID: 1000774):

Accuracy and mean recovery data presented below is based on a 95% confidence interval (k=2). The estimated accuracy applies to the media, technology, and SOP referenced in this report and does not account for the uncertainty associated with the sampling process. The accuracy is based solely on spike recovery data from internal quality control samples. Where N/A appears below, insufficient data is available to provide statistical accuracy and mean recovery values for the associated analyte.

| Parameter | Accuracy | Mean Recovery |
|-----------|----------|---------------|
| Lead | +/-7.9% | 99.5% |

| | | | | | | | |
|---|---------------|----------------|----|---------------|-------------------|------------------------|--------------------|
| < | -Less Than | mg -Milligrams | m3 | -Cubic Meters | kg -Kilograms | ppm -Parts per Million | |
| > | -Greater Than | ug -Micrograms | l | -Liters | NS -Not Specified | ND -Not Detected | NA -Not Applicable |

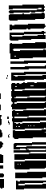
GGS GALSON

779323232882

Date: 06/08/17

Shipper: FEDEX

Initials: MAK



Prep: UNKNOWN

14050061

WED RESULTS BY: (surchage)

| | | |
|-------------------------------------|------------------|------|
| <input checked="" type="checkbox"/> | Standard | 0% |
| <input type="checkbox"/> | 4 Business Days | 35% |
| <input type="checkbox"/> | 3 Business Days | 50% |
| <input type="checkbox"/> | 2 Business Days | 75% |
| <input checked="" type="checkbox"/> | Next Day by 6pm | 100% |
| <input type="checkbox"/> | Next Day by Noon | 150% |
| <input type="checkbox"/> | Same Day | 200% |

Sample Identification*
(Maximum of 20 Characters)

428468-22
428468-14
428468-8
428468-9
428468-19

Date Sampled

06/07/2017
06/07/2017
06/07/2017
06/07/2017
06/07/2017

Collection Medium

37MM MCEF
37MM MCEF
37MM MCEF
37MM MCEF
37MM MCEF

Sample Volume
Sample Time
Sample Area*

1,014.9
1,055.7
994.5
1,004.7
1,004.7

Sample Units*
L, ml, min, in, 2, cm, 2, ft, 2

Liters
Liters
Liters
Liters
Liters

Analysis Requested*

LEAD
LEAD
LEAD
LEAD
LEAD

Method Reference*

NIOSH17300
NIOSH17300
NIOSH17300
NIOSH17300
NIOSH17300

Hexavalent Chromium
Process (e.g., welding
plating, painting, etc.)*

State samples were
collected in (e.g., NY)

NY

List description of industry or Process/interferences present in sampling area :

Painting

Please indicate which OEL this data will be used for :

☒ OSHA PEL ☐ ACGIH TLV ☐ Cal OSHA
☐ MSHA ☐ Other (specify):

Site Name : P66 Domestic Trade

Sampled by : JOHN A. PETREZZELLO

Comments :

Wet Abrasive Blast

☒ Samples submitted using the FreePumpLoan™ Program

☐ Samples submitted using the FreeSamplingBadges™ Program

New Client?

Report To*

Jim Peral

Invoice To*

Donna Wickert

Client Account No.:

West Virginia Paint
1051 Robinson Ave.
Clifton, NJ 07011

105

Phone No.:

732-261-8844

Phone No.:

973-772-6565

Cell No.:

P.O. No.:

donna@wvpaint.com

Email Results to:

jim@jeptechnical.com

Email:

donna@wvpaint.com

Email address:

jim@jeptechnical.com

Credit Card:

☐ Card on File ☐ Call for Credit Card Info.

*Galson Laboratories will substitute our routine/preferred method if it does not match the method listed on the COC unless this box is checked: ☐ Use method(s) listed on COC


For metals analysis: if requesting an analyte with the option of a lower LOQ, please indicate if the lower LOQ is required (only available for certain analytes - see SAG):

For crystalline silica: form(s) of silica needed must be indicated (Quartz, Cristobalite, and/or Tridymite)*:

| Chain of Custody | Print Name/Signature | Date | Time | Print Name/Signature | Date | Time |
|------------------|----------------------|------------|------|----------------------|-------|------|
| Relinquished by: | JOHN A. PETREZZELLO | 06/07/2017 | | REDEX | | |
| Relinquished by: | | | | MCavese | 06/17 | 0911 |


Samples received after 3pm will be considered as next day's business

* Required-Flags # include to Report to these media: 08/01/17, 1/01/17, 4/01/17, 5/01/17, 6/01/17, 7/01/17, 8/01/17, 9/01/17, 10/01/17, 11/01/17, 12/01/17

| | | |
|---|---------------------------------|-------------------|
|  | Health, Safety, and Environment | Page 2 of 2 |
| Issue No. 1 | IH MONITORING SAMPLE FORM | Issued: 1/26/2018 |


| | | | |
|-------------------------|-----------|----------------------|-------|
| Pre-Cal Date & Avg* | 2 | Post-Cal Date & Avg* | 2 |
| Flow Rate Average | 2 | Volume (Liters) | 820 L |
| Calibration | | | |
| Calibration Equipment** | Rotometer | Serial # | |
| Sample Time | | | |
| Start Time* | 8:00 | Stop Time* | 1450 |
| Start Time 2* | | Stop Time 2* | |
| Run Time | 410 min | Exposure Time | 300 |

| | | | |
|----------------------------|--|----------------|-----------|
| Sample & Location Comments | Abrasive Blast (WET), LEAD Based paint | | |
| | Stressors | | |
| Noise - Sound Level (LEQ) | P66 OEL: | OSHA HC: | OSHA PEL: |
| Results | Peak: | Maximum: | Minimum: |
| | Impulse: | Impulse Count: | |
| Tasks | | | |
| Controls | | | |
| PPE | | | |

| | | |
|---|---------------------------------|-------------------|
|  | Health, Safety, and Environment | Page 2 of 2 |
| Issue No. 1 | IH MONITORING SAMPLE FORM | Issued: 1/26/2018 |

| | | | |
|-------------------------|-----------|----------------------|--------|
| Pre-Cal Date & Avg* | 2 | Post-Cal Date & Avg* | 2 |
| Flow Rate Average | 2 | Volume (Liters) | 800L |
| Calibration | | | |
| Calibration Equipment** | Rotameter | Serial # | |
| Sample Time | | | |
| Start Time* | 800 | Stop Time* | 1440 |
| Start Time 2* | | Stop Time 2* | |
| Run Time | 400min | Exposure Time | 370min |


| | | | |
|----------------------------|--|----------------|-----------|
| Sample & Location Comments | Abrasive Blast (WET), Lead BASED PAINT | | |
| | Stressors | | |
| Noise -- Sound Level (LEQ) | P66 OEL: | OSHA HC: | OSHA PEL: |
| Results | Peak: | Maximum: | Minimum: |
| | Impulse: | Impulse Count: | |
| Tasks | | | |
| Controls | | | |
| PPE | | | |

| | | |
|---|---------------------------------|-------------------|
|  | Health, Safety, and Environment | Page 1 of 2 |
| Issue No. 1 | IH MONITORING SAMPLE FORM | Issued: 1/26/2018 |

| Details | | | |
|--|--|--|---|
| Sample Number | 110718-01 | Sample Date | 11/7/18 |
| Master Sample # | | Sample Type | <input checked="" type="radio"/> Personal <input type="radio"/> Area <input type="radio"/> Bulk <input type="radio"/> Wipe |
| Survey No.* | | Jurisdiction | <input checked="" type="radio"/> 666 Cal/OSHA <input checked="" type="radio"/> OSHA UK HSE <input type="radio"/> ACGIH |
| Blank ID* | | Direct Reading | <input type="radio"/> YES <input checked="" type="radio"/> NO |
| Stressor Group* | <input type="checkbox"/> ALDEHYDE <input type="checkbox"/> PAH <input type="checkbox"/> BTEX | Limit Type | <input type="checkbox"/> Ceiling <input checked="" type="checkbox"/> STEL <input type="checkbox"/> TWA _{short} <input type="checkbox"/> TWA _{long} <input type="checkbox"/> Quarterly |
| <input type="checkbox"/> BTEX PLUS <input type="checkbox"/> BUTADIENE-COMBO <input type="checkbox"/> HYDRO-COMBO | <input type="checkbox"/> WELDING <input type="checkbox"/> RAD DOSIMETRY | <input type="checkbox"/> Excursion <input type="checkbox"/> Bulk <input type="checkbox"/> Integrated | |
| <input checked="" type="checkbox"/> METAL/SCAD <input type="checkbox"/> SILICA/CRYST | | Void Reason* | |
| Sampled By | J. D. Lopez | | |
| Sample Details | | | |
| Process* | WET ABRASIVE BLAST | Sampling Strategy | <input type="radio"/> Random <input checked="" type="radio"/> Typical <input type="radio"/> Worst Case |
| Operation Status* | <input type="radio"/> Abnormal T/A <input type="radio"/> Emergency Maintenance <input checked="" type="radio"/> Normal Project | Period Type | <input checked="" type="radio"/> Full Shift <input type="radio"/> Task <input type="radio"/> Radiation Dose <input type="radio"/> Partial Shift |
| Worker | | | |
| Employee ID# | | Job Position* | PAINTER |
| Full Name | Krzysztof WROBE | Exposure Group | |
| Shift Code | <input checked="" type="radio"/> Day-9 <input type="radio"/> Day-10 <input type="radio"/> Day-12 <input type="radio"/> Night-9 <input type="radio"/> Night-10 <input type="radio"/> Night-12 | Shift Length (mins) | 480 |
| | | Resp. Protection* | BLAST HOOD |
| Sample Location | | | |
| Organization | WUPT | Work Location | CONCRETE |
| Org Level | | Division | |
| Work Area | Shed 53 | Location Type* | Scaffold |
| Environmental Conditions | | | |
| Temperature | 56 | Temp Unit | °C °F |
| Pressure | 30.11 | Press Units | MM INCHES |
| Wind Speed | calm | Wind Units | KPH MPH |
| Wind Direction* | calm | Humidity | ~ 30%-50% |
| Laboratory / Equipment | | | |
| Lab Name* | | Lot Number* | |
| Collection Media | | | |
| Equipment | | | |
| Sampling Equipment | BUCKLEBRA | Serial #* | L 404189 |
| Noise - Response Rate | FAST SLOW | Noise Type | Impulse Intermediate Steady |


* = Optional field

+ = See Table on Page 2

| | | |
|---|---------------------------------|-------------------|
|  | Health, Safety, and Environment | Page 2 of 2 |
| Issue No. 1 | IH MONITORING SAMPLE FORM | Issued: 1/26/2018 |

| | | | |
|-------------------------|-----------|----------------------|-------|
| Pre-Cal Date & Avg* | 2 | Post-Cal Date & Avg* | 2 |
| Flow Rate Average | 2 | Volume (Liters) | 810 L |
| Calibration | | | |
| Calibration Equipment** | Rotometer | Serial # | |
| Sample Time | | | |
| Start Time* | 800 | Stop Time* | 1445 |
| Start Time 2* | | Stop Time 2* | |
| Run Time | 405 min. | Exposure Time | 375 |


| | | | |
|----------------------------|--|----------------|-----------|
| Sample & Location Comments | Abrasive Blast (WED), Lead Based Paint | | |
| | | | |
| Stressors | | | |
| Noise – Sound Level (LEQ) | P66 OEL: | OSHA HC: | OSHA PEL: |
| Results | Peak: | Maximum: | Minimum: |
| | Impulse: | Impulse Count: | |
| Tasks | | | |
| Controls | | | |
| PPE | | | |

| | | |
|---|---------------------------------|-------------------|
|  | Health, Safety, and Environment | Page 1 of 2 |
| Issue No. 1 | IH MONITORING SAMPLE FORM | Issued: 1/26/2018 |

| Details | | | |
|--------------------------|--|---------------------|---|
| Sample Number | 110818-01 | Sample Date | 11/8/18 |
| Master Sample # | | Sample Type | Personal <input checked="" type="radio"/> Area <input type="radio"/> Bulk <input type="radio"/> Wipe <input type="radio"/> |
| Survey No.* | | Jurisdiction | 66 <input checked="" type="radio"/> Cal OSHA <input type="radio"/> OSHA <input type="radio"/> UK HSE <input type="radio"/> ACGIH <input type="radio"/> |
| Blank ID* | | Direct Reading | YES <input type="radio"/> NO <input checked="" type="radio"/> |
| Stressor Group* | ALDEHYDE <input type="radio"/> BTEX PLUS <input checked="" type="radio"/> METAL/SCAN <input type="radio"/> SILICA/CRYST <input type="radio"/> PAH <input type="radio"/> BUTADIENE COMBO <input type="radio"/> WELDING <input type="radio"/> ASBESTOS <input type="radio"/> BTEX <input type="radio"/> HYDROC COMBO <input type="radio"/> RAD DOSIMETRY <input type="radio"/> | Limit Type | Ceiling <input type="radio"/> STEL <input type="radio"/> Excursion <input type="radio"/> Bulk <input type="radio"/> TWA <input checked="" type="radio"/> Integrated <input type="radio"/> TWA <input type="radio"/> Quarterly <input type="radio"/> |
| Sampled By | Jim Poese | Void Reason* | |
| Sample Details | | | |
| Process* | | Sampling Strategy | Random <input checked="" type="radio"/> Typical <input type="radio"/> Worst Case <input type="radio"/> |
| Operation Status* | Abnormal <input type="radio"/> T/A <input type="radio"/> Emergency Maintenance <input type="radio"/> Normal <input checked="" type="radio"/> Project <input type="radio"/> | Period Type | Full Shift <input checked="" type="radio"/> Task <input type="radio"/> Radiation Dose <input type="radio"/> Partial Shift <input type="radio"/> |
| Worker | | | |
| Employee ID# | | Job Position* | POINTER |
| Full Name | KRYZTOF ROBEL | Exposure Group | |
| Shift Code | Day 8 <input checked="" type="radio"/> Day 10 <input type="radio"/> Day 12 <input type="radio"/> Night 8 <input type="radio"/> Night 10 <input type="radio"/> Night 12 <input type="radio"/> | Shift Length (mins) | 480 |
| | | Resp. Protection* | BLAST HOD |
| Sample Location | | | |
| Organization | WUPR | Work Location | Scrubber |
| Org Level | | Division | |
| Work Area | Sphere 5.3 | Location Type* | Contaminant |
| Environmental Conditions | | | |
| Temperature | 78 | Temp Unit | °C <input type="radio"/> °F <input checked="" type="radio"/> |
| Pressure | 30.37 | Press Units | MM <input checked="" type="radio"/> INCHES <input type="radio"/> |
| Wind Speed | 13 | Wind Units | KPH <input checked="" type="radio"/> MPH <input type="radio"/> |
| Wind Direction* | NW 13 NNW | Humidity | ~40% |
| Laboratory / Equipment | | | |
| Lab Name* | | Lot Number* | |
| Collection Media | | | |
| Equipment | | | |
| Sampling Equipment | BUCK LABRA | Serial #* | L404188 |
| Noise - Response Rate | FAST <input type="radio"/> SLOW <input type="radio"/> | Noise Type | Impulse <input type="radio"/> Intermediate <input type="radio"/> Steady <input type="radio"/> |


* = Optional field

+ = See Table on Page 2

| | | |
|---|---------------------------------|-------------------|
|  | Health, Safety, and Environment | Page 2 of 2 |
| Issue No. 1 | IH MONITORING SAMPLE FORM | Issued: 1/26/2018 |

| | | | |
|-------------------------|------------|----------------------|---------|
| Pre-Cal Date & Avg* | 2 | Post-Cal Date & Avg* | 2 |
| Flow Rate Average | 2 | Volume (Liters) | 820 |
| Calibration | | | |
| Calibration Equipment** | ROXONET 50 | Serial # | |
| Sample Time | | | |
| Start Time* | 800 | Stop Time* | 1450 |
| Start Time 2* | | Stop Time 2* | |
| Run Time | 410 min | Exposure Time | 380 min |


| | | | |
|----------------------------|------------------------------------|----------------|-----------|
| Sample & Location Comments | WET ABRASIVE BLASTING, LBP removal | | |
| | Stressors | | |
| Noise – Sound Level (LEQ) | P66 OEL: | OSHA HC: | OSHA PEL: |
| Results | Peak: | Maximum: | Minimum: |
| | Impulse: | Impulse Count: | |
| Tasks | | | |
| Controls | | | |
| PPE | | | |

| | | |
|---|---------------------------------|-------------------|
|  | Health, Safety, and Environment | Page 1 of 2 |
| Issue No. 1 | IH MONITORING SAMPLE FORM | Issued: 1/26/2018 |

| Details | | | | |
|---|---|--|--|--|
| Sample Number | 110818-02 | | Sample Date | 11/8/18 |
| Master Sample # | | | Sample Type <input checked="" type="radio"/> Personal <input type="radio"/> Area <input type="radio"/> Bulk <input type="radio"/> Wipe | |
| Survey No.* | | | Jurisdiction <input checked="" type="radio"/> P66 <input type="radio"/> OSHA <input type="radio"/> ACGIH <input type="radio"/> Cal OSHA <input type="radio"/> UK HSE | |
| Blank ID* | | | Direct Reading | YES NO |
| Stressor Group* | | | Limit Type | |
| <input checked="" type="radio"/> ALDEHYDE <input type="radio"/> PAH <input type="radio"/> BTEX <input checked="" type="radio"/> BTEX PINS <input type="radio"/> BUTADIENE COMBO <input type="radio"/> HYDROC-COMBO <input checked="" type="radio"/> METAL SCAN <input type="radio"/> WELDING <input type="radio"/> RAD DOSIMETRY <input type="radio"/> SILICA-CRYST <input type="radio"/> ASBESTOS | | | <input type="radio"/> Ceiling <input type="radio"/> STEL <input checked="" type="radio"/> TWA <input type="radio"/> TWAup <input type="radio"/> Excursion <input type="radio"/> Bulk <input type="radio"/> Integrated <input type="radio"/> Quarterly | |
| Sampled By | JIM POEG | | Void Reason* | |
| Sample Details | | | | |
| Process* | Wet Abrasive Blasting | | Sampling Strategy | Random Typical Worst Case |
| Operation Status* | | | Period Type | |
| <input type="radio"/> Abnormal <input checked="" type="radio"/> Emergency <input type="radio"/> Normal <input type="radio"/> T/A <input type="radio"/> Maintenance <input type="radio"/> Project | | | <input type="radio"/> Full Shift <input type="radio"/> Task <input type="radio"/> Radiation <input type="radio"/> Partial Shift <input type="radio"/> Dose | |
| Worker | | | | |
| Employee ID# | | | Job Position* | PAINTER |
| Full Name | Billy Petriello | | Exposure Group | |
| Shift Code | <input checked="" type="radio"/> Day <input type="radio"/> Day-10 <input type="radio"/> Day-12 <input type="radio"/> Night-8 <input type="radio"/> Night-10 <input type="radio"/> Night-12 | | Shift Length (mins) | 480 |
| | | | Resp. Protection* | BLASTHOOD |
| Sample Location | | | | |
| Organization | WVPT | | Work Location | Containment |
| Org Level | | | Division | |
| Work Area | Sphere 53 | | Location Type* | one-off shot |
| Environmental Conditions | | | | |
| Temperature | 48 | | Temp Unit | °C <input checked="" type="radio"/> °F |
| Pressure | 30.37 | | Press Units | MM <input checked="" type="radio"/> INCHES |
| Wind Speed | 13 | | Wind Units | KPH <input checked="" type="radio"/> MPH |
| Wind Direction* | NW/NNW | | Humidity | 40% |
| Laboratory / Equipment | | | | |
| Lab Name* | | | Lot Number* | |
| Collection Media | | | | |
| Equipment | | | | |
| Sampling Equipment | | | Serial #* | L404189 |
| Noise - Response Rate | FAST SLOW | | Noise Type | Impulse Intermediate Steady |

* = Optional field

+ = See Table on Page 2

| | | |
|---|---------------------------------|-------------------|
|  | Health, Safety, and Environment | Page 2 of 2 |
| Issue No. 1 | IH MONITORING SAMPLE FORM | Issued: 1/26/2018 |

| | | | |
|-------------------------|-------|----------------------|------|
| Pre-Cal Date & Avg* | 2 | Post-Cal Date & Avg* | 2 |
| Flow Rate Average | 2 | Volume (Liters) | 800 |
| Calibration | | | |
| Calibration Equipment** | | Serial # | |
| Sample Time | | | |
| Start Time* | 800 | Stop Time* | 1440 |
| Start Time 2* | | Stop Time 2* | |
| Run Time | 400mm | Exposure Time | 370 |

| | | | |
|----------------------------|-------------------------------------|----------------|-----------|
| Sample & Location Comments | WET. ABRASIVE BLASTING, LBP removal | | |
| | Stressors | | |
| Noise – Sound Level (LEQ) | P66 OEL: | OSHA HC: | OSHA PEL: |
| Results | Peak: | Maximum: | Minimum: |
| | Impulse: | Impulse Count: | |
| Tasks | | | |
| Controls | | | |
| PPE | Tyvek, Starkey Shell | | |



Estimated area where orange
paint flakes were observed.

Harbor Access Rd

Harbor Access Rd