



June 4, 2015

Mr. Steve Spurlin
On-Scene Coordinator
U.S. Environmental Protection Agency, Region 4
61 Forsyth Street, SW, 11th Floor
Atlanta, Georgia 30303

**Subject: Final Removal Assessment Report
Wrigley Charcoal
Lyles, Hickman County, Tennessee
Contract Number (No.) EP-S4-14-03
TDD No. TT-02-004**

Dear Mr. Spurlin:

The Tetra Tech Superfund Technical Assessment and Response Team (START) is submitting this removal assessment report summarizing asbestos bulk material and soil sampling activities conducted from April 20 through 21, 2015 at the Wrigley Charcoal Industrial Plastics Company (Industrial Plastics) in Lyles, Hickman County, Tennessee. This report includes four enclosures and two attachments. Enclosure 1 contains figures illustrating the site location, site layout, and bulk material and soil sampling locations. Enclosure 2 contains tables summarizing the bulk material and soil sampling results. Enclosure 3 contains the photographic log of the sampling activities. Enclosure 4 contains the accreditation documentation of the Tetra Tech START, State of Tennessee certified asbestos inspector. Attachment 1 contains the laboratory accreditation certificate. Attachment 2 contains the laboratory results for the bulk material and soil samples collected.

EXECUTIVE SUMMARY

On April 20 and 21, 2015, U.S. Environmental Protection Agency (EPA) On-Scene Coordinator (OSC) Steve Spurlin and Tetra Tech START conducted a site assessment of the Industrial Plastics site at the Wrigley Charcoal Plant, located in Lyles, Hickman County, Tennessee, to determine the extent of asbestos contamination at the site for removal activities. Tetra Tech START collected bulk samples of suspect asbestos-containing building materials (ACBM) from each building and soil samples from delineated areas around the designated removal area of the site in accordance with the site-specific sampling and analysis plan (SAP). On April 21, 2015, EPA and Tetra Tech START demobilized from the site.

Analytical results for the cementitious roofing material in each building and a red brick wall in Building 3 indicated concentrations of greater than one percent asbestos and are classified as asbestos-containing materials (ACM). Analytical results for five soil samples indicated the presence of asbestos.

SITE BACKGROUND

The former Wrigley Charcoal Plant Superfund site occupies 35 acres, 15 of which are occupied by Industrial Plastics on the southern portion of the property. Industrial Plastics' address is 8526 Plant Road, Hickman County, Lyles, Tennessee. The coordinates for the site (as measured from the approximate center of Industrial Plastics) are latitude 35.902826 degrees north and longitude 87.352800 degrees west (see

Figure 1 in Enclosure 1). The western boundary of the Industrial Plastics site is North Fork Mill Creek with residential neighborhoods in close proximity surrounding the site (see Figure 2 in Enclosure 1).

The Wrigley Charcoal Plant Superfund site was placed on the National Priorities List (NPL) in 1989, and includes active remediation and groundwater monitoring of site contaminants, including wood tar chemicals, metals, and creosote, throughout the property. Industrial Plastics is a small-scale recycling facility that conducts metals and plastics recycling, storage of waste products, and other related activities. The Industrial Plastics property consists of a large warehouse, a large processing building and approximately 5 acres of outside/uncovered storage of processed and unprocessed acrylic, polycarbonate, Acrylonitrile butadiene styrene (ABS), polyethylene, polypropylene, styrene, polyvinyl chloride (PVC), and polyethylene terephthalate (PETG) plastics in totes and piles.

On December 18, 2013, there was a fire at the Industrial Plastics site of the Wrigley Charcoal Plant. EPA OSC Spurlin and the EPA's Emergency Response and Removal Branch (ERRB) were contacted. EPA mobilized Tetra Tech START and an Emergency Response and Removal Services (ERRS) contractor to supplement local fire resources and provide community air monitoring support. ERRS utilized soil from a local borrow pit to smother the fire, while Tetra Tech conducted air monitoring activities to protect on-site personnel and the surrounding community. On December 20, 2013, ERRS had extinguished the fire and begun placing erosion control barriers (silt fencing and straw wattles) to protect the creek adjacent to the site. On December 20, 2013, all EPA personnel and contractors demobilized from the site.

On January 27, 2015, EPA OSC Steve Spurlin met with personnel from Tennessee Department of Environment and Conservation (TDEC), Tetra Tech START, and CMC, Inc., the EPA ERRS contractor, to discuss a site assessment to determine the extent of removal activities associated with emergency response activities conducted from December 18 to 20, 2013. A visual assessment of the property was conducted to determine current site conditions and the stability of the remaining structures.

ASBESTOS BULK MATERIAL SAMPLING

On April 20, 2015, Tetra Tech START collected bulk material samples of suspect asbestos-containing materials (ACM) from the remaining site building structures and the debris within to determine the presence or absence of asbestos. The bulk material samples were collected by a Tetra Tech START, State of Tennessee accredited asbestos inspector, Accreditation No. A-I-50043-34058 (see Enclosure 4), in accordance with Rules of Environment and Conservation, Chapter 1200-01-20, Asbestos Accreditation Requirements. The following sections will discuss survey and sampling procedures and sampling results.

Asbestos Survey and Sampling Procedures

A visual survey was initially conducted by Tetra Tech START to identify homogeneous areas (HA) of suspected ACM and develop a scheme for obtaining representative bulk samples. Homogeneous materials are similar in color, size, texture, and date of application. After completion of the visual survey, the number of samples for each HA was established and bulk samples of the representative homogeneous materials were randomly obtained from each site structure. The materials were further examined at the site to assess their physical condition and potential for disturbance. The following suspect materials were identified and sampled:

- Cementitious roofing material
- Various types of building brick

- Various types of building brick mortar
- Window glazing

Bulk samples were submitted to EMSL Analytical, Inc., a Tetra Tech-procured, National Voluntary Laboratory Accreditation Program (NVLAP) accredited laboratory (see Attachment 1), in Cinnaminson, New Jersey. Bulk samples were analyzed by polarized light microscopy (PLM) in accordance with U.S. Environmental Protection Agency (EPA) Method 600-R-93-116, Method for the Determination of Asbestos in Bulk Building Materials. PLM is an analytical method recommended by the EPA for identification of asbestos based on analysis of the unique optical properties of mineral forms in the samples. If a sample is visually estimated to contain less than 10 percent asbestos, Code of Federal Regulation (CFR), Title 40, Protection of the Environment, Part 61, National Emission Standards for Hazardous Air Pollutants (NESHAP), Subpart M, National Emission Standard for Asbestos (40 CFR 61), requires that sample be reanalyzed by PLM point counting. PLM point counting is not required when the building owner or operator assumes the amount of the material to contain greater than 1 percent asbestos and treats the material as asbestos containing.

For a specific list of analytical results for bulk samples collected from each building, see Table 1 in Enclosure 2. Sample locations are identified on Figure 3 in Enclosure 1. Photographic documentation of the materials sampled are located in Enclosure 3.

Bulk Sampling Results

A total of 66 bulk samples were collected from the identified suspect ACM. The results of the bulk sampling and analysis indicated that 10 samples contained asbestos concentrations greater than one percent and could be categorized as ACM. The materials in the table below are classified as ACM.

Homogenous Areas	MATERIAL DESCRIPTION	ASBESTOS TYPE	ESTIMATED QUANTITY	LOCATION
1	Cementitious Roof Material - Building 1	35% to 50% chrysotile asbestos	30,000 square feet	Building 1 - Throughout
4	Cementitious Roof Material - Building 2	50% to 60% chrysotile asbestos	14,000 square feet	Building 2 – Throughout
10	Cementitious Roof Material - Building 3	10% to 15% chrysotile asbestos	300 square feet	Building 3 – Throughout
11	Red Brick Wall - Building 3	2% chrysotile asbestos	300 square feet	Building 3 - West side of the south exterior wall

The above building materials are classified as Category II non-friable ACM. Category II non-friable ACM is defined in 40 CFR 61.141 as any material, excluding Category I non-friable ACM, containing more than 1 percent asbestos as determined using the methods specified in Appendix E, Subpart E, 40 CFR Part 763, Section 1, PLM that, when dry, cannot be crumbled, pulverized, or reduced to powder by hand pressure.

During previous emergency response activities, the cementitious roof material was extensively damaged in each building and in some cases been rendered friable classifying the material as regulated asbestos-

containing material (RACM). RACM is defined in 40 CFR 61 as (a) friable asbestos material, (b) Category 1 non-friable ACM that has become friable, (c) Category 1 non-friable ACM that will be or has been subjected to sanding, grinding, cutting, or abrading, or (d) Category II non-friable ACM that has a high probability of becoming or has become crumbled, pulverized, or reduced to powder by the forces expected to act on the material in the course of demolition or renovation operations.

These materials usually become RACM and removal is required by a state of Tennessee licensed asbestos abatement contractor before renovation or demolition affect the materials and disposal must be managed as ACM.

ASBESTOS SOIL SAMPLING

In accordance with the site-specific SAP, Tetra Tech START collected surface soil samples outside of the designated removal area to determine the presence or absence of asbestos and whether or not additional soil removal is necessary. Sampling areas of 25 feet by 50 feet and 100 feet by 100 feet were delineated around the perimeter of the designated removal area (see Figure 2 in Enclosure 1). A 5-point composite soil sample was collected from the surface of each grid to a depth of 0 to 1 inch below ground surface (bgs) and homogenized to form one sample for each grid.

All soil samples were submitted to EMSL Analytical, Inc. and were analyzed for asbestos in accordance with the EPA Office of Solid Waste and Emergency Response (OSWER) Asbestos Committee of the Technical Review Workgroup, *Framework for Investigating Asbestos-Contaminated Superfund Sites*, OSWER Directive #9200.0-68 and California Environmental Protection Agency Air Resources Board (CARB) Method 435, *Determination of Asbestos Content of Serpentine Aggregate*.

Tetra Tech START personnel collected composite soil samples from 25 of the 27 areas around the designated removal area. Two of those areas, Areas 10 and 27, were not sampled due to the large amount of standing water in each area. Analytical results of the soil samples indicated the presence of asbestos in five of the areas sampled. Asbestos concentrations for these areas are as follows:

- Area 11 – Sample WC-AS-11-042115 had an asbestos concentration of 0.30 percent.
- Area 12 – Sample WC-AS-12-042115 had an asbestos concentration of 0.60 percent.
- Area 13 – Sample WC-AS-13-042115 had an asbestos concentration of 0.50 percent.
- Area 14 – Sample WC-AS-14-042115 had an asbestos concentration of 0.40 percent.
- Area 26 – Sample WC-AS-26-042115 had an asbestos concentration of 0.30 percent.

For a specific list of analytical results for the soil samples collected around the designated removal area, see Table 2 in Enclosure 2. Sample locations are identified on Figure 4 in Enclosure 1.

Mr. S. Spurlin
June 4, 2015
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If you have any questions or need additional copies of this report, please contact me, Paul Prys, at (678) 775-3106 or Todd Taylor at (615) 992-5556.

Sincerely,



Paul E. Prys II
START IV Senior Scientist



Andrew F. Johnson
START IV Program Manager

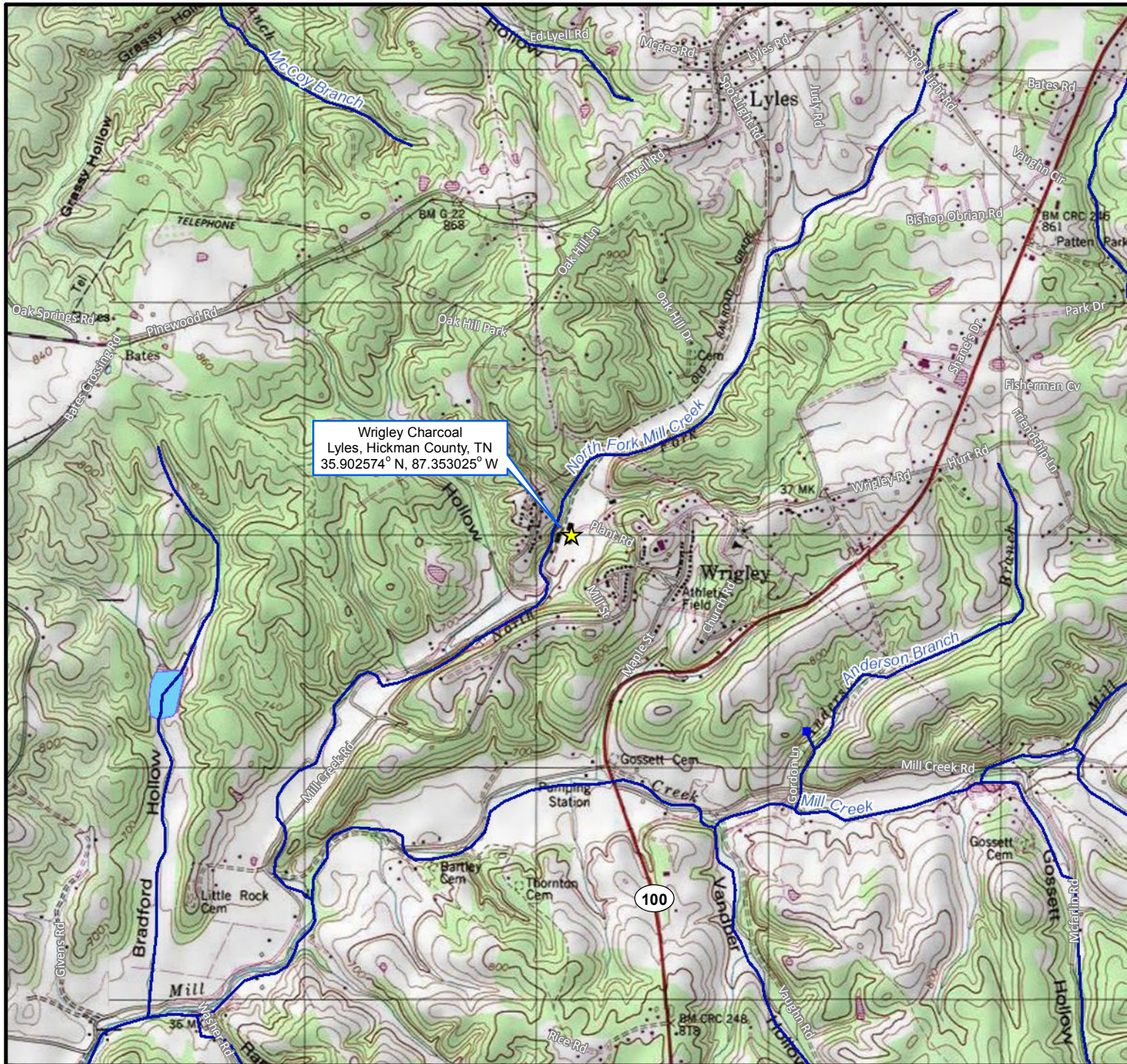
Enclosures (4)

cc: Katrina Jones, EPA Project Officer
Angel Reed, START IV Document Control Coordinator

ENCLOSURE 1

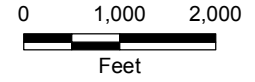
FIGURES

(Four Pages)

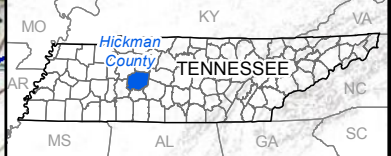


Wrigley Charcoal
 Lyles, Hickman County, TN
 35.902574° N, 87.353025° W

Legend
 ★ Site Location



Map Sources:
 USGS 7.5 Minute Topographic Quadrangle Maps:
 Texas Hollow, TN 1968 & Lyles, TN 1992.
 National Hydrology Dataset, 2015.



 **United States Environmental Protection Agency Region 4**

FIGURE 1




Site Location

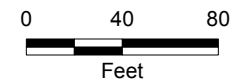
TDD Name: Wrigley Charcoal
TDD No.: TT-02-004
City: Lyles **County:** Hickman **State:** Tennessee

 **TETRA TECH**
 Date: 2/23/2015
 Analyst: dale.vonbusch



Legend

-  Bulk Sampling Area
-  Soil Sampling Area (approximately 50' x 25')
-  Additional Soil Sampling Area (up to 100' x 100')



Map Sources:
ESRI Aerial Imagery, 2012.



United States
Environmental Protection Agency
Region 4

FIGURE 2

Site Layout with
Sampling Areas

TDD Name: Wrigley Charcoal

TDD No.: TT-02-004

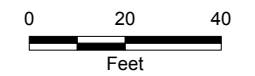
City: Lyles	County: Hickman	State: Tennessee
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Date:
5/20/2015
Analyst:
dale.vonbusch



- Legend**
- Greater than 1% Asbestos Detected
 - No Asbestos Detected
 - Proposed Removal Area



Notes:
 B## - Building Number
 MW# - Window Glazing
 RM# - Roofing Material
 WB# - Brick Wall
 WBM# - Brick Wall Mortar
 WC - Wrigley Charcoal

Map Sources:
 ESRI Aerial Imagery, 2010-2012.



FIGURE 3
 Asbestos Bulk Sampling Locations and Results

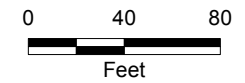
TDD Name: Wrigley Charcoal
 TDD No.: TT-02-004
 City: Lyles County: Hickman State: Tennessee

Tt TETRA TECH Date: 5/20/2015
 Analyst: daie.vonbusch



Legend

- Abestos Detected
- No Asbestos Detected
- Soil Sampling Area (approximately 50' x 25')
- Additional Soil Sampling Area (up to 100' x 100')



Notes:
 ## - Area Number
 042115 - Date Sample Collected
 AS - Asbestos Soil Sample
 WC - Wrigley Charcoal

Map Sources:
 ESRI Aerial Imagery, 2012.
 National Hydrology Dataset, 2015.



FIGURE 4

Asbestos Soil Sampling Locations and Results

TDD Name: Wrigley Charcoal
TDD No.: TT-02-004
City: Lyles **County:** Hickman **State:** Tennessee

Tetra Tech **Date:** 5/20/2015
Analyst: dale.vonbusch

ENCLOSURE 2

BULK MATERIAL AND SOIL SAMPLING RESULTS TABLES

(Five Pages)

**TABLE 1
WRIGLEY CHARCOAL SITE
ANALYTICAL RESULTS FOR ASBESTOS BULK SAMPLES**

HA	SAMPLE NUMBER	MATERIAL DESCRIPTION	ASBESTOS DETECTED BY PLM	FRIABLE	NON-ASBESTOS MATERIAL PRESENT	COMMENTS
1	WC-B01-RM1-01	Cementitious Roof Material - Building 1	35% Chrysotile asbestos	No	See detailed laboratory sheet in Attachment 2	Debris pile at the center of the north end of Building 1
	WC-B01-RM1-02		35% Chrysotile asbestos	No	See detailed laboratory sheet in Attachment 2	Debris pile at the center of Building 1
	WC-B01-RM1-03		50% Chrysotile asbestos	No	See detailed laboratory sheet in Attachment 2	Debris pile in the northwest area of Building 1
2	WC-B01-WB1-01	Red Brick Wall - Building 1	NAD	NA	See detailed laboratory sheet in Attachment 2	Northeast corner of the Building 1 exterior wall
	WC-B01-WB1-02		NAD	NA	See detailed laboratory sheet in Attachment 2	Ground debris from the center of the north end of Building 1
	WC-B01-WB1-03		NAD	NA	See detailed laboratory sheet in Attachment 2	North end of the west interior wall of Building 1
	WC-B01-WB1-04		NAD	NA	See detailed laboratory sheet in Attachment 2	South end of the west interior wall of Building 1
	WC-B01-WB1-05		NAD	NA	See detailed laboratory sheet in Attachment 2	Center of Building 1 on the exterior wall of an office/maintenance shop
	WC-B01-WB1-06		NAD	NA	See detailed laboratory sheet in Attachment 2	Center of the south end of the Building 1 exterior wall
	WC-B01-WB1-07		NAD	NA	See detailed laboratory sheet in Attachment 2	Southeast corner of the Building 1 exterior wall
	WC-B01-WB1-08		NAD	NA	See detailed laboratory sheet in Attachment 2	Northeast area of Building 1 interior wall next to machine
	WC-B01-WB1-09		NAD	NA	See detailed laboratory sheet in Attachment 2	Northeast doorway of interior office/maintenance shop located in the southeast portion of Building 1
3	WC-B01-WBM1-01	Red Brick Wall Mortar - Building 1	NAD	NA	See detailed laboratory sheet in Attachment 2	Northeast corner of the Building 1 exterior wall
	WC-B01-WBM1-02		NAD	NA	See detailed laboratory sheet in Attachment 2	Ground debris from the center of the north end of Building 1
	WC-B01-WBM1-03		NAD	NA	See detailed laboratory sheet in Attachment 2	North end of the west interior wall of Building 1
	WC-B01-WBM1-04		NAD	NA	See detailed laboratory sheet in Attachment 2	South end of the west interior wall of Building 1
	WC-B01-WBM1-05		NAD	NA	See detailed laboratory sheet in Attachment 2	Center of Building 1 on the exterior wall of an office/maintenance shop
	WC-B01-WBM1-06		NAD	NA	See detailed laboratory sheet in Attachment 2	Center of the south end of the Building 1 exterior wall
	WC-B01-WBM1-07		NAD	NA	See detailed laboratory sheet in Attachment 2	Southeast corner of the Building 1 exterior wall

**TABLE 1
WRIGLEY CHARCOAL SITE
ANALYTICAL RESULTS FOR ASBESTOS BULK SAMPLES**

HA	SAMPLE NUMBER	MATERIAL DESCRIPTION	ASBESTOS DETECTED BY PLM	FRIABLE	NON-ASBESTOS MATERIAL PRESENT	COMMENTS
3	WC-B01-WBM1-08	Red Brick Wall Mortar - Building 1	NAD	NA	See detailed laboratory sheet in Attachment 2	Northeast area of Building 1 interior wall next to machine
	WC-B01-WBM1-09		NAD	NA	See detailed laboratory sheet in Attachment 2	Northeast doorway of interior office/maintenance shop located in the southeast portion of Building 1
4	WC-B02-RM1-01	Cementitious Roof Material - Building 2	60% Chrysotile asbestos	No	See detailed laboratory sheet in Attachment 2	Debris pile at the center of the north end of Building 2
	WC-B02-RM1-02		50% Chrysotile asbestos	No	See detailed laboratory sheet in Attachment 2	Debris pile at the center of Building 2
	WC-B02-RM1-03		50% Chrysotile asbestos	No	See detailed laboratory sheet in Attachment 2	Debris pile in the southwest area of Building 2
5	WC-B02-WB2-01	Red Brick Wall - Building 2	NAD	NA	See detailed laboratory sheet in Attachment 2	Northeast corner of the Building 2 exterior wall
	WC-B02-WB2-02		NAD	NA	See detailed laboratory sheet in Attachment 2	At the interior wall located in the northwest area of Building 2
	WC-B02-WB2-03		NAD	NA	See detailed laboratory sheet in Attachment 2	South end of the west interior wall of Building 2
	WC-B02-WB2-04		NAD	NA	See detailed laboratory sheet in Attachment 2	West side of the south interior wall of Building 2
	WC-B02-WB2-05		NAD	NA	See detailed laboratory sheet in Attachment 2	East side of the south exterior wall of Building 2
	WC-B02-WB2-06		NAD	NA	See detailed laboratory sheet in Attachment 2	South end of the east interior wall at doorway in Building 2
	WC-B02-WB2-07		NAD	NA	See detailed laboratory sheet in Attachment 2	Center of east interior wall in Building 2
	WC-B02-WB2-08		NAD	NA	See detailed laboratory sheet in Attachment 2	Center of north interior wall in Building 2
	WC-B02-WB2-09		NAD	NA	See detailed laboratory sheet in Attachment 2	Northwest corner of Building 2 exterior wall
6	WC-B02-WBM2-01	Red Brick Wall Mortar - Building 2	NAD	NA	See detailed laboratory sheet in Attachment 2	Northeast corner of the Building 2 exterior wall
	WC-B02-WBM2-02		NAD	NA	See detailed laboratory sheet in Attachment 2	At the interior wall located in the northwest area of Building 2
	WC-B02-WBM2-03		NAD	NA	See detailed laboratory sheet in Attachment 2	South end of the west interior wall of Building 2
	WC-B02-WBM2-04		NAD	NA	See detailed laboratory sheet in Attachment 2	West side of the south interior wall of Building 2
	WC-B02-WBM2-05		NAD	NA	See detailed laboratory sheet in Attachment 2	East side of the south exterior wall of Building 2

TABLE 1
WRIGLEY CHARCOAL SITE
ANALYTICAL RESULTS FOR ASBESTOS BULK SAMPLES

HA	SAMPLE NUMBER	MATERIAL DESCRIPTION	ASBESTOS DETECTED BY PLM	FRIABLE	NON-ASBESTOS MATERIAL PRESENT	COMMENTS
6	WC-B02-WBM2-06	Red Brick Wall Mortar - Building 2	NAD	NA	See detailed laboratory sheet in Attachment 2	South end of the east interior wall at doorway in Building 2
	WC-B02-WBM2-07		NAD	NA	See detailed laboratory sheet in Attachment 2	Center of east interior wall in Building 2
	WC-B02-WBM2-08		NAD	NA	See detailed laboratory sheet in Attachment 2	Center of north interior wall in Building 2
	WC-B02-WBM2-09		NAD	NA	See detailed laboratory sheet in Attachment 2	Northwest corner of Building 2 exterior wall
7	WC-B02-WB5-01	Red Rectangular Brick - Building 2	NAD	NA	See detailed laboratory sheet in Attachment 2	South end of west interior wall of office located at the north end of Building 2
	WC-B02-WB5-02		NAD	NA	See detailed laboratory sheet in Attachment 2	Center of south end of south interior wall of office located at the north end of Building 2
	WC-B02-WB5-03		NAD	NA	See detailed laboratory sheet in Attachment 2	Southeast corner of south interior wall of office located at the north end of Building 2
8	WC-B02-WBM5-01	Red Rectangular Brick Wall Mortar - Building 2	NAD	NA	See detailed laboratory sheet in Attachment 2	South end of west interior wall of office located at the north end of Building 2
	WC-B02-WBM5-02		NAD	NA	See detailed laboratory sheet in Attachment 2	Center of south end of south interior wall of office located at the north end of Building 2
	WC-B02-WBM5-03		NAD	NA	See detailed laboratory sheet in Attachment 2	Southeast corner of south interior wall of office located at the north end of Building 2
9	WC-B03-MW1-01	Window Glazing - Building 3	NAD	NA	See detailed laboratory sheet in Attachment 2	North window of the east wall in Building 3
	WC-B03-MW1-02		NAD	NA	See detailed laboratory sheet in Attachment 2	Center window of the east wall in Building 3
	WC-B03-MW1-03		NAD	NA	See detailed laboratory sheet in Attachment 2	South window of the east wall in Building 3
10	WC-B03-RM1-01	Cementitious Roof Material - Building 3	10% Chrysotile asbestos	No	See detailed laboratory sheet in Attachment 2	Debris pile at the center of the north end of Building 3
	WC-B03-RM1-02		10% Chrysotile asbestos	No	See detailed laboratory sheet in Attachment 2	Debris pile at the center of Building 3
	WC-B03-RM1-03		15% Chrysotile asbestos	No	See detailed laboratory sheet in Attachment 2	Debris pile at the center of the south end of Building 3
11	WC-B03-WB3-01	Red Brick Wall - Building 3	NAD	NA	See detailed laboratory sheet in Attachment 2	Northeast corner of the Building 3 exterior wall
	WC-B03-WB3-02		NAD	NA	See detailed laboratory sheet in Attachment 2	South end of the west exterior wall of Building 3
	WC-B03-WB3-03		2% Chrysotile asbestos	No	See detailed laboratory sheet in Attachment 2	West side of the south exterior wall of Building 3

TABLE 1
WRIGLEY CHARCOAL SITE
ANALYTICAL RESULTS FOR ASBESTOS BULK SAMPLES

HA	SAMPLE NUMBER	MATERIAL DESCRIPTION	ASBESTOS DETECTED BY PLM	FRIABLE	NON-ASBESTOS MATERIAL PRESENT	COMMENTS
12	WC-B03-WBM3-01	Red Brick Wall Mortar - Building 3	NAD	NA	See detailed laboratory sheet in Attachment 2	Northeast corner of the Building 3 exterior wall
	WC-B03-WBM3-02		NAD	NA	See detailed laboratory sheet in Attachment 2	South end of the west exterior wall of Building 3
	WC-B03-WBM3-03		NAD	NA	See detailed laboratory sheet in Attachment 2	West side of the south exterior wall of Building 3
13	WC-B03-WB4-01	Concrete Brick Wall - Building 3	NAD	NA	See detailed laboratory sheet in Attachment 2	South end of interior west wall of Building 3
	WC-B03-WB4-02		NAD	NA	See detailed laboratory sheet in Attachment 2	At doorway of northwest interior wall of Building 3
	WC-B03-WB4-03		NAD	NA	See detailed laboratory sheet in Attachment 2	At north window of the east interior wall of Building 3
14	WC-B03-WBM4-01	Concrete Brick Wall Mortar - Building 3	NAD	NA	See detailed laboratory sheet in Attachment 2	South end of interior west wall of Building 3
	WC-B03-WBM4-02		NAD	NA	See detailed laboratory sheet in Attachment 2	At doorway of northwest interior wall of Building 3
	WC-B03-WBM4-03		NAD	NA	See detailed laboratory sheet in Attachment 2	At north window of the east interior wall of Building 3

NOTES

- B##: Building number
- HA: Homogeneous area
- MW: Window glazing
- NA: Not applicable
- NAD: No asbestos detected
- WB: Brick wall
- WBM: Brick wall mortar
- WC: Wrigley Charcoal

**TABLE 2
WRIGLEY CHARCOAL SITE
ANALYTICAL RESULTS FOR ASBESTOS SOIL SAMPLES**

SAMPLE AREA	SAMPLE NUMBER	ASBESTOS DETECTED	COMMENTS
1	WC-AS-01-042115	NAD	Soil sample, 5-point composite
2	WC-AS-02-042115	NAD	Soil sample, 5-point composite
3	WC-AS-03-042115	NAD	Soil sample, 5-point composite
4	WC-AS-04-042115	NAD	Soil sample, 5-point composite
5	WC-AS-05-042115	NAD	Soil sample, 5-point composite
6	WC-AS-06-042115	NAD	Soil sample, 5-point composite
7	WC-AS-07-042115	NAD	Soil sample, 5-point composite
8	WC-AS-08-042115	NAD	Soil sample, 5-point composite
9	WC-AS-09-042115	NAD	Soil sample, 5-point composite
10	WC-AS-10-042115		Sample not collected
11	WC-AS-11-042115	0.30% Chrysotile asbestos	Soil sample, 5-point composite
12	WC-AS-12-042115	0.60% Chrysotile asbestos	Soil sample, 5-point composite
13	WC-AS-13-042115	0.50% Chrysotile asbestos	Soil sample, 5-point composite
14	WC-AS-14-042115	0.40% Chrysotile asbestos	Soil sample, 5-point composite
15	WC-AS-15-042115	NAD	Soil sample, 5-point composite
16	WC-AS-16-042115	NAD	Soil sample, 5-point composite
17	WC-AS-17-042115	NAD	Soil sample, 5-point composite
18	WC-AS-18-042115	NAD	Soil sample, 5-point composite
19	WC-AS-19-042115	NAD	Soil sample, 5-point composite
20	WC-AS-20-042115	NAD	Soil sample, 5-point composite
21	WC-AS-21-042115	NAD	Soil sample, 5-point composite
22	WC-AS-22-042115	NAD	Soil sample, 5-point composite
23	WC-AS-23-042115	NAD	Soil sample, 5-point composite
24	WC-AS-24-042115	NAD	Soil sample, 5-point composite
25	WC-AS-25-042115	NAD	Soil sample, 5-point composite
26	WC-AS-26-042115	0.30% Chrysotile asbestos	Soil sample, 5-point composite
27	WC-AS-27-042115		Sample not collected

NOTES

%: Percent
AS: Asbestos soil sample
NAD: No asbestos detected
WC: Wrigley Charcoal

ENCLOSURE 3
PHOTOGRAPHIC LOG
(Nine Pages)



OFFICIAL PHOTOGRAPH NO. 2
U.S. ENVIRONMENTAL PROTECTION AGENCY

TDD Number: TT-02-004

Location: Wrigley Charcoal

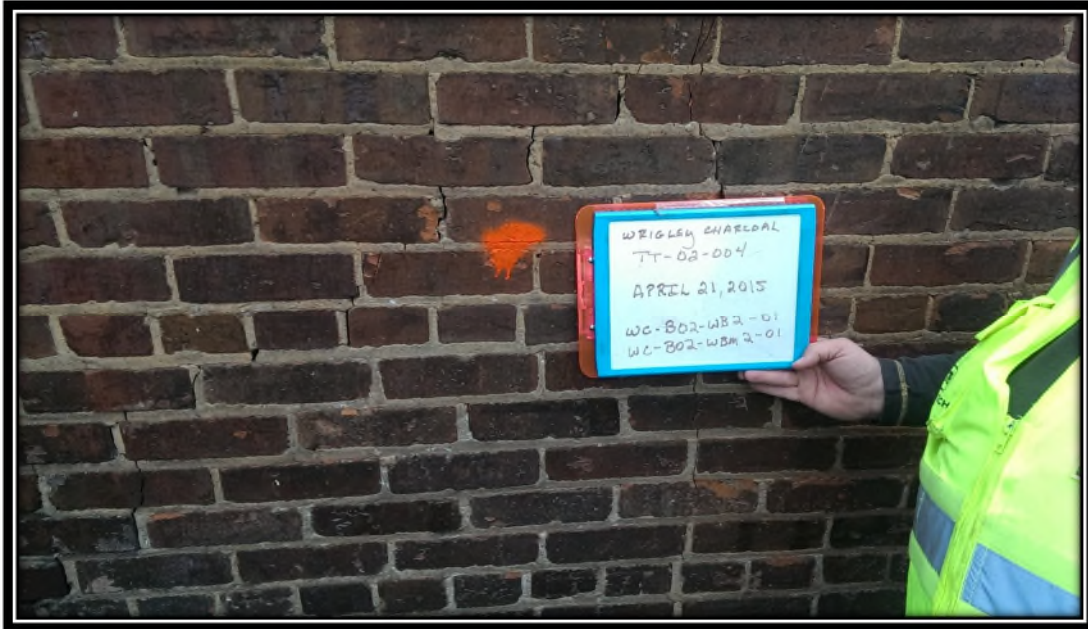
Orientation: South

Date: April 21, 2015

Photographer: Paul Prys, Tetra Tech

Witness: Todd Taylor, Tetra Tech

Subject: The red brick wall and associated mortar sampled from Building 1. Sampling results indicated there was no asbestos detected from either building material.



OFFICIAL PHOTOGRAPH NO. 4
U.S. ENVIRONMENTAL PROTECTION AGENCY

TDD Number: TT-02-004

Location: Wrigley Charcoal

Orientation: South

Date: April 21, 2015

Photographer: Paul Prys, Tetra Tech

Witness: Todd Taylor, Tetra Tech

Subject: The red brick wall and associated mortar sampled from Building 2. Sampling results indicated there was no asbestos detected from either building material.



OFFICIAL PHOTOGRAPH NO. 5
U.S. ENVIRONMENTAL PROTECTION AGENCY

TDD Number: TT-02-004

Location: Wrigley Charcoal

Orientation: North

Date: April 21, 2015

Photographer: Paul Prys, Tetra Tech

Witness: Todd Taylor, Tetra Tech

Subject: The red rectangular brick wall and associated mortar sampled from Building 2. Sampling results indicated there was no asbestos detected from either building material.



OFFICIAL PHOTOGRAPH NO. 6
U.S. ENVIRONMENTAL PROTECTION AGENCY

TDD Number: TT-02-004

Location: Wrigley Charcoal

Orientation: East

Date: April 21, 2015

Photographer: Paul Prys, Tetra Tech

Witness: Todd Taylor, Tetra Tech

Subject: The window glazing sampled from Building 3. Sampling results indicated there was no asbestos detected.



OFFICIAL PHOTOGRAPH NO. 7
U.S. ENVIRONMENTAL PROTECTION AGENCY

TDD Number: TT-02-004

Location: Wrigley Charcoal

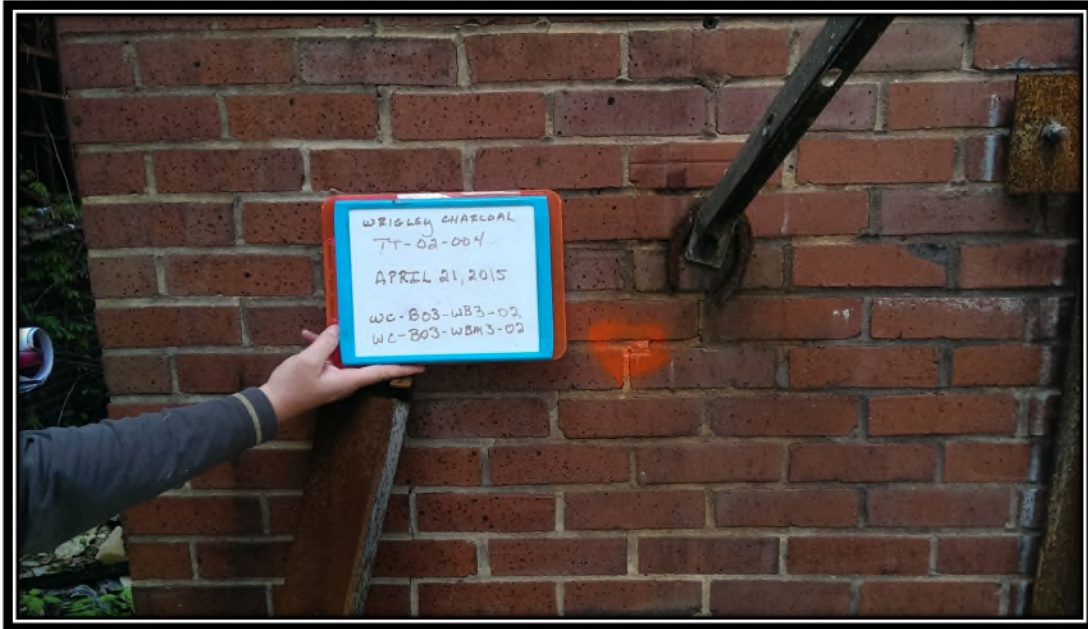
Orientation: Not applicable

Date: April 21, 2015

Photographer: Paul Prys, Tetra Tech

Witness: Todd Taylor, Tetra Tech

Subject: The cementitious roof material sampled from Building 3. Sampling results indicated chrysotile asbestos concentrations ranged from 10 to 15 percent.



OFFICIAL PHOTOGRAPH NO. 8
U.S. ENVIRONMENTAL PROTECTION AGENCY

TDD Number: TT-02-004

Location: Wrigley Charcoal

Orientation: North

Date: April 21, 2015

Photographer: Paul Prys, Tetra Tech

Witness: Todd Taylor, Tetra Tech

Subject: The red brick wall and associated mortar sampled from the western side of the southern exterior wall of Building 3. Results for the red brick wall sample, WC-B03-WB3-03, indicated an asbestos concentration of 2 percent.



OFFICIAL PHOTOGRAPH NO. 9
U.S. ENVIRONMENTAL PROTECTION AGENCY

TDD Number: TT-02-004

Location: Wrigley Charcoal

Orientation: Northwest

Date: April 21, 2015

Photographer: Paul Prys, Tetra Tech

Witness: Todd Taylor, Tetra Tech

Subject: The concrete brick wall and associated mortar sampled from Building 3. Sampling results indicated there was no asbestos detected from either building material.

ENCLOSURE 4

ASBESTOS INSPECTOR CERTIFICATION

(Two Pages)

THE STATE OF TENNESSEE

87583-25026

Department of Environment and Conservation
Division of Solid Waste Management
Toxic Substances Program



Date Issued: 5/1/2016

Re-Accreditation

Paul E. Prys II

DOB	Sex	HGT	WGT
07-Aug-1967	M	5' 11"	185

Discipline	Accreditation	Expiration
Inspector	A-1-50043-34058	Apr-30-2016

Asbestos Accreditation

The Environmental Institute

Paul Prys

Social Security Number - XXX-XX-1339

Tetra Tech, Inc. - 1955 Evergreen Blvd. - Building 200, Suite 300 - Duluth, Georgia 30096

*Has completed coursework and satisfactorily passed
an examination that meets all criteria required for
EPA/AHERA/ASHARA (TSCA Title II) Approved Reccreditation*

Asbestos in Buildings: Inspector Refresher

February 6, 2015

Course Date

14806

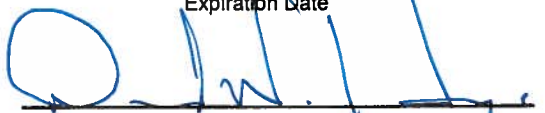
Certificate Number

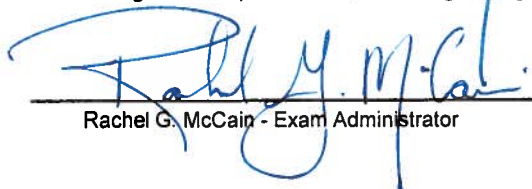
February 6, 2015

Examination Date

February 5, 2016

Expiration Date


David W. Hogue - Principal Instructor / Training Manager


Rachel G. McCain - Exam Administrator



(Approved by the ABIH Certification Maintenance Committee for 1/2 CM point - Approval #11-577)

(Florida Provider Registration Number FL49-0001342 - Course #FL49-0002805)

TEI - 1841 West Oak Parkway, Suite F - Marietta, Georgia 30062 - (770) 427-3600 - www.tei-atl.com

ATTACHMENT 1
LABORATORY CERTIFICATIONS
(Three Pages)

United States Department of Commerce
National Institute of Standards and Technology



Certificate of Accreditation to ISO/IEC 17025:2005

NVLAP LAB CODE: 201044-0

EMSL Analytical, Inc.
Bridgeville, PA

*is accredited by the National Voluntary Laboratory Accreditation Program for specific services,
listed on the Scope of Accreditation, for:*

BULK ASBESTOS FIBER ANALYSIS

*This laboratory is accredited in accordance with the recognized International Standard ISO/IEC 17025:2005.
This accreditation demonstrates technical competence for a defined scope and the operation of a laboratory quality
management system (refer to joint ISO-ILAC-IAF Communique dated January 2009).*

2014-09-23 through 2015-09-30

Effective dates



A handwritten signature in black ink, appearing to read "William R. M. L.", positioned above a horizontal line.

For the National Institute of Standards and Technology



**National Voluntary
Laboratory Accreditation Program**



SCOPE OF ACCREDITATION TO ISO/IEC 17025:2005

EMSL Analytical, Inc.
 400 Bursca Drive
 Suite 401
 Bridgeville, PA 15017
 Ms. Maureen Sammons
 Phone: 412-360-8094 Fax: 412-360-8095
 E-Mail: msammons@emsl.com
 URL: <http://www.emsl.com>

BULK ASBESTOS FIBER ANALYSIS (PLM)

NVLAP LAB CODE 201044-0

NVLAP Code Designation / Description

- 18/A01 EPA 600/M4-82-020: Interim Method for the Determination of Asbestos in Bulk Insulation Samples
- 18/A03 EPA 600/R-93/116: Method for the Determination of Asbestos in Bulk Building Materials

2014-09-23 through 2015-09-30

Effective dates

For the National Institute of Standards and Technology



**National Voluntary
Laboratory Accreditation Program**



SCOPE OF ACCREDITATION TO ISO/IEC 17025:2005

EMSL Analytical, Inc.
 400 Bursca Drive
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 Ms. Maureen Sammons
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 E-Mail: msammons@emsl.com
 URL: <http://www.emsl.com>

BULK ASBESTOS FIBER ANALYSIS (PLM)

NVLAP LAB CODE 201044-0

<i>NVLAP Code</i>	<i>Designation / Description</i>
18/A01	EPA 600/M4-82-020: Interim Method for the Determination of Asbestos in Bulk Insulation Samples
18/A03	EPA 600/R-93/116: Method for the Determination of Asbestos in Bulk Building Materials

2014-09-23 through 2015-09-30

Effective dates

For the National Institute of Standards and Technology

ENCLOSURE 2
LABORATORY ANALYTICAL RESULTS
(13 Pages)

**EMSL Analytical, Inc.**

200 Route 130 North, Cinnaminson, NJ 08077

Phone/Fax: (800) 220-3675 / (856) 786-5974

<http://www.EMSL.com>cinnaslab@EMSL.com

EMSL Order: 041511835

CustomerID: TETT62

CustomerPO:

ProjectID:

Attn: **Jessica Vickers**
Tetra Tech
1955 Evergreen Blvd.
Bldg. 200 Suite 300
Duluth, GA 30096

Phone: (678) 775-3094
 Fax: (678) 775-3138
 Received: 04/23/15 9:30 AM
 Analysis Date: 5/8/2012
 Collected: 4/21/2015

Project: **Wrigley Charcoal / 103X902702004.001F / 8526 Plant Road, Lyles, Tennessee**

Test Report: PLM Analysis of Bulk Samples for Asbestos via EPA 600/R-93/116 Method with CARB 435 Prep (Milling). Level B for 0.1% Target Analytical Sensitivity

Sample	Description	Appearance	Non-Asbestos		Asbestos
			% Fibrous	% Non-Fibrous	% Type
WC-AS-01-042115 <i>041511835-0001</i>		Brown Non-Fibrous Homogeneous		100.00% Non-fibrous (other)	None Detected
WC-AS-02-042115 <i>041511835-0002</i>		Tan Non-Fibrous Homogeneous		100.00% Non-fibrous (other)	None Detected
WC-AS-02-042115-DUP <i>041511835-0003</i>		Tan Non-Fibrous Homogeneous		100.00% Non-fibrous (other)	None Detected
WC-AS-03-042115 <i>041511835-0004</i>		Tan Non-Fibrous Homogeneous		100.00% Non-fibrous (other)	None Detected
WC-AS-04-042115 <i>041511835-0005</i>		Tan Non-Fibrous Homogeneous		100.00% Non-fibrous (other)	None Detected
WC-AS-05-042115 <i>041511835-0006</i>		Tan/Brown Other Homogeneous		100.00% Non-fibrous (other)	None Detected
WC-AS-06-042115 <i>041511835-0007</i>		Tan/Brown Non-Fibrous Homogeneous		100.00% Non-fibrous (other)	None Detected

Analyst(s)

Andrew Castellano (22)
 Jillian Yurick (5)

Benjamin Ellis, Laboratory Manager
 or other approved signatory

EMSL maintains liability limited to the cost of analysis. This report relates only to the samples reported above and may not be reproduced, except in full, without written approval by EMSL. EMSL bears no responsibility for sample collection activities or analytical method limitations. Interpretation and use of test results are the responsibility of the client. The test results contained within this report meet the requirements of NELAP unless otherwise specified. Samples received in good condition unless otherwise noted.

Samples analyzed by EMSL Analytical, Inc. Cinnaminson, NJ

Initial report from 05/08/2015 11:22:20

**EMSL Analytical, Inc.**

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Duluth, GA 30096

Phone: (678) 775-3094
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 Received: 04/23/15 9:30 AM
 Analysis Date: 5/8/2012
 Collected: 4/21/2015

Project: **Wrigley Charcoal / 103X902702004.001F / 8526 Plant Road, Lyles, Tennessee**

Test Report: PLM Analysis of Bulk Samples for Asbestos via EPA 600/R-93/116 Method with CARB 435 Prep (Milling). Level B for 0.1% Target Analytical Sensitivity

Sample	Description	Appearance	Non-Asbestos		Asbestos
			% Fibrous	% Non-Fibrous	% Type
WC-AS-07-042115 <i>041511835-0008</i>		Tan Non-Fibrous Homogeneous		100.00% Non-fibrous (other)	None Detected
WC-AS-028-042115 <i>041511835-0009</i>		Tan Non-Fibrous Homogeneous		100.00% Non-fibrous (other)	None Detected
WC-AS-09-042115 <i>041511835-0010</i>		Gray Non-Fibrous Homogeneous		100.00% Non-fibrous (other)	None Detected
WC-AS-11-042115 <i>041511835-0011</i>		Brown Non-Fibrous Homogeneous		99.70% Non-fibrous (other)	0.30% Chrysotile
WC-AS-12-042115 <i>041511835-0012</i>		Brown Non-Fibrous Homogeneous		99.40% Non-fibrous (other)	0.60% Chrysotile
WC-AS-13-042115 <i>041511835-0013</i>		Brown Non-Fibrous Homogeneous		99.50% Non-fibrous (other)	0.50% Chrysotile
WC-AS-14-042115 <i>041511835-0014</i>		Brown Non-Fibrous Homogeneous		99.60% Non-fibrous (other)	0.40% Chrysotile

Analyst(s)

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Initial report from 05/08/2015 11:22:20

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 Analysis Date: 5/8/2012
 Collected: 4/21/2015

Project: **Wrigley Charcoal / 103X902702004.001F / 8526 Plant Road, Lyles, Tennessee**

Test Report: PLM Analysis of Bulk Samples for Asbestos via EPA 600/R-93/116 Method with CARB 435 Prep (Milling). Level B for 0.1% Target Analytical Sensitivity

Sample	Description	Appearance	Non-Asbestos		Asbestos
			% Fibrous	% Non-Fibrous	% Type
WC-AS-15-042115 <i>041511835-0015</i>		Brown Non-Fibrous Homogeneous		100.00% Non-fibrous (other)	None Detected
WC-AS-16-042115 <i>041511835-0016</i>		Brown Non-Fibrous Homogeneous		100.00% Non-fibrous (other)	None Detected
WC-AS-17-042115 <i>041511835-0017</i>		Brown/Gray Non-Fibrous Homogeneous		100.00% Non-fibrous (other)	None Detected
WC-AS-18-042115 <i>041511835-0018</i>		Brown Non-Fibrous Homogeneous		100.00% Non-fibrous (other)	None Detected
WC-AS-19-042115 <i>041511835-0019</i>		Brown Non-Fibrous Homogeneous		100.00% Non-fibrous (other)	None Detected
WC-AS-20-042115 <i>041511835-0020</i>		Brown Non-Fibrous Homogeneous	2.00% Glass	98.00% Non-fibrous (other)	None Detected
WC-AS-21-042115 <i>041511835-0021</i>		Brown Non-Fibrous Homogeneous		100.00% Non-fibrous (other)	None Detected

Analyst(s)
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 Samples analyzed by EMSL Analytical, Inc. Cinnaminson, NJ

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 Received: 04/23/15 9:30 AM
 Analysis Date: 5/8/2012
 Collected: 4/21/2015

Project: **Wrigley Charcoal / 103X902702004.001F / 8526 Plant Road, Lyles, Tennessee**

Test Report: PLM Analysis of Bulk Samples for Asbestos via EPA 600/R-93/116 Method with CARB 435 Prep (Milling). Level B for 0.1% Target Analytical Sensitivity

Sample	Description	Appearance	Non-Asbestos		Asbestos
			% Fibrous	% Non-Fibrous	% Type
WC-AS-22-042115 <i>041511835-0022</i>		Brown Non-Fibrous Homogeneous		100.00% Non-fibrous (other)	None Detected
WC-AS-22-042115-DUP <i>041511835-0023</i>		Brown Non-Fibrous Homogeneous		100.00% Non-fibrous (other)	None Detected
WC-AS-23-042115 <i>041511835-0024</i>		Brown/Tan Non-Fibrous Homogeneous		100.00% Non-fibrous (other)	None Detected
WC-AS-24-042115 <i>041511835-0025</i>		Brown/Gray Non-Fibrous Homogeneous		100.00% Non-fibrous (other)	None Detected
WC-AS-25-042115 <i>041511835-0026</i>		Brown/Tan Non-Fibrous Homogeneous		100.00% Non-fibrous (other)	None Detected
WC-AS-26-042115 <i>041511835-0027</i>		Gray Non-Fibrous Homogeneous		99.70% Non-fibrous (other)	0.30% Chrysotile

Analyst(s)

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 Jillian Yurick (5)

Benjamin Ellis, Laboratory Manager
 or other approved signatory

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 Samples analyzed by EMSL Analytical, Inc. Cinnaminson, NJ

Initial report from 05/08/2015 11:22:20



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ProjectID:	

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Phone: (678) 775-3094
 Fax: (678) 775-3138
 Received: 04/23/15 9:30 AM
 Analysis Date: 5/5/2015
 Collected: 4/21/2015


Project: **Wrigley Charcoal / 103x902702004.001F / 8526 Plant Road, Lyles, Tennessee**

Test Report: Asbestos Analysis of Bulk Materials via EPA 600/R-93/116 Method using Polarized Light Microscopy

Sample	Description	Appearance	Non-Asbestos		Asbestos
			% Fibrous	% Non-Fibrous	% Type
WC-B01-RM1-01 <i>041511840-0001</i>		Gray Fibrous Homogeneous		65% Non-fibrous (other)	35% Chrysotile
WC-B01-RM1-02 <i>041511840-0002</i>		Gray Fibrous Homogeneous		65% Non-fibrous (other)	35% Chrysotile
WC-B01-RM1-03 <i>041511840-0003</i>		Gray Fibrous Homogeneous		50% Non-fibrous (other)	50% Chrysotile
WC-B01-WB1-01 <i>041511840-0004</i>		Brown Non-Fibrous Homogeneous		100% Non-fibrous (other)	None Detected
WC-B01-WB1-02 <i>041511840-0005</i>		Brown Non-Fibrous Homogeneous		100% Non-fibrous (other)	None Detected
WC-B01-WB1-03 <i>041511840-0006</i>		Brown Non-Fibrous Homogeneous		100% Non-fibrous (other)	None Detected
WC-B01-WB1-04 <i>041511840-0007</i>		Brown Non-Fibrous Homogeneous		100% Non-fibrous (other)	None Detected
WC-B01-WB1-05 <i>041511840-0008</i>		Brown Non-Fibrous Homogeneous		100% Non-fibrous (other)	None Detected

Analyst(s)

 Abigail Crock (26)
 Maureen Sammons (40)


 Benjamin Ellis, Laboratory Manager
 or other approved signatory

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 Samples analyzed by EMSL Analytical, Inc. Bridgeville, PA

Initial report from 05/05/2015 15:19:58



EMSL Analytical, Inc.

200 Route 130 North, Cinnaminson, NJ 08077

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cinnaslab@EMSL.com

EMSL Order:	041511840
CustomerID:	TETT62
CustomerPO:	
ProjectID:	


Attn: Jessica Vickers Tetra Tech 1955 Evergreen Blvd. Bldg. 200 Suite 300 Duluth, GA 30096	Phone: (678) 775-3094 Fax: (678) 775-3138 Received: 04/23/15 9:30 AM Analysis Date: 5/5/2015 Collected: 4/21/2015
Project: Wrigley Charcoal / 103x902702004.001F / 8526 Plant Road, Lyles, Tennessee	

Test Report: Asbestos Analysis of Bulk Materials via EPA 600/R-93/116 Method using Polarized Light Microscopy

Sample	Description	Appearance	Non-Asbestos		Asbestos
			% Fibrous	% Non-Fibrous	% Type
WC-B01-WB1-06 <i>041511840-0009</i>		Brown Non-Fibrous Homogeneous		100% Non-fibrous (other)	None Detected
WC-B01-WB1-07 <i>041511840-0010</i>		Brown Non-Fibrous Homogeneous		100% Non-fibrous (other)	None Detected
WC-B01-WB1-08 <i>041511840-0011</i>		Brown Non-Fibrous Homogeneous		100% Non-fibrous (other)	None Detected
WC-B01-WB1-09 <i>041511840-0012</i>		Brown Non-Fibrous Homogeneous		100% Non-fibrous (other)	None Detected
WC-B01-WBM1-01 <i>041511840-0013</i>		Brown Non-Fibrous Homogeneous		100% Non-fibrous (other)	None Detected
WC-B01-WBM1-02 <i>041511840-0014</i>		Gray Non-Fibrous Homogeneous		100% Non-fibrous (other)	None Detected
WC-B01-WBM1-03 <i>041511840-0015</i>		Gray Non-Fibrous Homogeneous		100% Non-fibrous (other)	None Detected
WC-B01-WBM1-04 <i>041511840-0016</i>		Gray Non-Fibrous Homogeneous		100% Non-fibrous (other)	None Detected

Analyst(s)

 Abigail Crock (26)
 Maureen Sammons (40)


 Benjamin Ellis, Laboratory Manager
 or other approved signatory

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 Samples analyzed by EMSL Analytical, Inc. Bridgeville, PA

Initial report from 05/05/2015 15:19:58



EMSL Analytical, Inc.

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EMSL Order:	041511840
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Attn: **Jessica Vickers**
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 Received: 04/23/15 9:30 AM
 Analysis Date: 5/5/2015
 Collected: 4/21/2015


Project: **Wrigley Charcoal / 103x902702004.001F / 8526 Plant Road, Lyles, Tennessee**

Test Report: Asbestos Analysis of Bulk Materials via EPA 600/R-93/116 Method using Polarized Light Microscopy

Sample	Description	Appearance	Non-Asbestos		Asbestos
			% Fibrous	% Non-Fibrous	% Type
WC-B01-WBM1-05 <i>041511840-0017</i>		Brown Non-Fibrous Homogeneous		100% Non-fibrous (other)	None Detected
WC-B01-WBM1-06 <i>041511840-0018</i>		Gray Non-Fibrous Homogeneous		100% Non-fibrous (other)	None Detected
WC-B01-WBM1-07 <i>041511840-0019</i>		Gray Non-Fibrous Homogeneous		100% Non-fibrous (other)	None Detected
WC-B01-WBM1-08 <i>041511840-0020</i>		Gray Non-Fibrous Homogeneous		100% Non-fibrous (other)	None Detected
WC-B01-WBM1-09 <i>041511840-0021</i>		Gray Non-Fibrous Homogeneous		100% Non-fibrous (other)	None Detected
WC-B02-RM1-01 <i>041511840-0022</i>		Brown/Black Fibrous Homogeneous		40% Non-fibrous (other)	60% Chrysotile
WC-B02-RM1-02 <i>041511840-0023</i>		Brown/Black Fibrous Homogeneous		50% Non-fibrous (other)	50% Chrysotile
WC-B02-RM1-03 <i>041511840-0024</i>		Brown Fibrous Homogeneous		50% Non-fibrous (other)	50% Chrysotile

Analyst(s)

 Abigail Crock (26)
 Maureen Sammons (40)


 Benjamin Ellis, Laboratory Manager
 or other approved signatory

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 Samples analyzed by EMSL Analytical, Inc. Bridgeville, PA

Initial report from 05/05/2015 15:19:58



EMSL Analytical, Inc.

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EMSL Order:	041511840
CustomerID:	TETT62
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ProjectID:	


Attn: Jessica Vickers Tetra Tech 1955 Evergreen Blvd. Bldg. 200 Suite 300 Duluth, GA 30096	Phone: (678) 775-3094 Fax: (678) 775-3138 Received: 04/23/15 9:30 AM Analysis Date: 5/5/2015 Collected: 4/21/2015
Project: Wrigley Charcoal / 103x902702004.001F / 8526 Plant Road, Lyles, Tennessee	

Test Report: Asbestos Analysis of Bulk Materials via EPA 600/R-93/116 Method using Polarized Light Microscopy

Sample	Description	Appearance	Non-Asbestos		Asbestos
			% Fibrous	% Non-Fibrous	% Type
WC-B02-WB2-01 <i>041511840-0025</i>		Brown Non-Fibrous Homogeneous		100% Non-fibrous (other)	None Detected
WC-B02-WB2-02 <i>041511840-0026</i>		Brown Non-Fibrous Homogeneous		100% Non-fibrous (other)	None Detected
WC-B02-WB2-03 <i>041511840-0027</i>		Brown Non-Fibrous Homogeneous		100% Non-fibrous (other)	None Detected
WC-B02-WB2-04 <i>041511840-0028</i>		Brown Non-Fibrous Homogeneous		100% Non-fibrous (other)	None Detected
WC-B02-WB2-05 <i>041511840-0029</i>		Brown Non-Fibrous Homogeneous		100% Non-fibrous (other)	None Detected
WC-B02-WB2-06 <i>041511840-0030</i>		Brown Non-Fibrous Homogeneous		100% Non-fibrous (other)	None Detected
WC-B02-WB2-07 <i>041511840-0031</i>		Brown Non-Fibrous Homogeneous		100% Non-fibrous (other)	None Detected
WC-B02-WB2-08 <i>041511840-0032</i>		Brown Non-Fibrous Homogeneous		100% Non-fibrous (other)	None Detected

Analyst(s)

 Abigail Crock (26)
 Maureen Sammons (40)


 Benjamin Ellis, Laboratory Manager
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Project: **Wrigley Charcoal / 103x902702004.001F / 8526 Plant Road, Lyles, Tennessee**

Test Report: Asbestos Analysis of Bulk Materials via EPA 600/R-93/116 Method using Polarized Light Microscopy

Sample	Description	Appearance	Non-Asbestos		Asbestos
			% Fibrous	% Non-Fibrous	% Type
WC-B02-WB2-09 <i>041511840-0033</i>		Brown Non-Fibrous Homogeneous		100% Non-fibrous (other)	None Detected
WC-B02-WBM2-01 <i>041511840-0034</i>		Brown Non-Fibrous Homogeneous		100% Non-fibrous (other)	None Detected
WC-B02-WBM2-02 <i>041511840-0035</i>		Gray Non-Fibrous Homogeneous		100% Non-fibrous (other)	None Detected
WC-B02-WBM2-03 <i>041511840-0036</i>		Gray Non-Fibrous Homogeneous		100% Non-fibrous (other)	None Detected
WC-B02-WBM2-04 <i>041511840-0037</i>		Brown Non-Fibrous Homogeneous		100% Non-fibrous (other)	None Detected
WC-B02-WBM2-05 <i>041511840-0038</i>		Gray Non-Fibrous Homogeneous		100% Non-fibrous (other)	None Detected
WC-B02-WBM2-06 <i>041511840-0039</i>		Brown Non-Fibrous Homogeneous		100% Non-fibrous (other)	None Detected
WC-B02-WBM2-07 <i>041511840-0040</i>		Brown Non-Fibrous Homogeneous		100% Non-fibrous (other)	None Detected

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Project: **Wrigley Charcoal / 103x902702004.001F / 8526 Plant Road, Lyles, Tennessee**

Test Report: Asbestos Analysis of Bulk Materials via EPA 600/R-93/116 Method using Polarized Light Microscopy

Sample	Description	Appearance	Non-Asbestos		Asbestos
			% Fibrous	% Non-Fibrous	% Type
WC-B02-WBM2-08 <i>041511840-0041</i>		Brown Non-Fibrous Homogeneous		100% Non-fibrous (other)	None Detected
WC-B02-WBM2-09 <i>041511840-0042</i>		Brown Non-Fibrous Homogeneous		100% Non-fibrous (other)	None Detected
WC-B02-WB5-01 <i>041511840-0043</i>		Brown Non-Fibrous Homogeneous		100% Non-fibrous (other)	None Detected
WC-B02-WB5-02 <i>041511840-0044</i>		Brown Non-Fibrous Homogeneous		100% Non-fibrous (other)	None Detected
WC-B02-WB5-03 <i>041511840-0045</i>		Brown Non-Fibrous Homogeneous		100% Non-fibrous (other)	None Detected
WC-B02-WBM5-01 <i>041511840-0046</i>		Gray Non-Fibrous Homogeneous		100% Non-fibrous (other)	None Detected
WC-B02-WBM5-02 <i>041511840-0047</i>		Brown Non-Fibrous Homogeneous		100% Non-fibrous (other)	None Detected
WC-B02-WBM5-03 <i>041511840-0048</i>		Gray Non-Fibrous Homogeneous		100% Non-fibrous (other)	None Detected

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Project: Wrigley Charcoal / 103x902702004.001F / 8526 Plant Road, Lyles, Tennessee	

Test Report: Asbestos Analysis of Bulk Materials via EPA 600/R-93/116 Method using Polarized Light Microscopy

Sample	Description	Appearance	Non-Asbestos		Asbestos
			% Fibrous	% Non-Fibrous	% Type
WC-B03-MW1-01 <i>041511840-0049</i>		Gray Non-Fibrous Homogeneous	8% Wollastonite	92% Non-fibrous (other)	None Detected
WC-B03-MW1-02 <i>041511840-0050</i>		Gray Non-Fibrous Homogeneous	8% Wollastonite	92% Non-fibrous (other)	None Detected
WC-B03-MW1-03 <i>041511840-0051</i>		Gray Non-Fibrous Homogeneous	10% Wollastonite	90% Non-fibrous (other)	None Detected
WC-B03-RM1-01 <i>041511840-0052</i>		Gray Fibrous Homogeneous		90% Non-fibrous (other)	10% Chrysotile
WC-B03-RM1-02 <i>041511840-0053</i>		Gray Fibrous Homogeneous		90% Non-fibrous (other)	10% Chrysotile
WC-B03-RM1-03 <i>041511840-0054</i>		Gray Fibrous Homogeneous		85% Non-fibrous (other)	15% Chrysotile
WC-B03-WB3-01 <i>041511840-0055</i>		Brown Non-Fibrous Homogeneous		100% Non-fibrous (other)	None Detected
WC-B03-WB3-02 <i>041511840-0056</i>		Brown Non-Fibrous Homogeneous		100% Non-fibrous (other)	None Detected

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Project: **Wrigley Charcoal / 103x902702004.001F / 8526 Plant Road, Lyles, Tennessee**

Test Report: Asbestos Analysis of Bulk Materials via EPA 600/R-93/116 Method using Polarized Light Microscopy

Sample	Description	Appearance	Non-Asbestos		Asbestos
			% Fibrous	% Non-Fibrous	% Type
WC-B03-WB3-03 <i>041511840-0057</i>		Brown Fibrous Homogeneous		98% Non-fibrous (other)	2% Chrysotile
WC-B03-WBM3-01 <i>041511840-0058</i>		Gray Non-Fibrous Homogeneous		100% Non-fibrous (other)	None Detected
WC-B03-WBM3-02 <i>041511840-0059</i>		Gray Non-Fibrous Homogeneous		100% Non-fibrous (other)	None Detected
WC-B03-WBM3-03 <i>041511840-0060</i>		Gray Non-Fibrous Homogeneous		100% Non-fibrous (other)	None Detected
WC-B03-WB4-01 <i>041511840-0061</i>		Gray Non-Fibrous Homogeneous		100% Non-fibrous (other)	None Detected
WC-B03-WB4-02 <i>041511840-0062</i>		Gray Non-Fibrous Homogeneous		100% Non-fibrous (other)	None Detected
WC-B03-WB4-03 <i>041511840-0063</i>		Gray Non-Fibrous Homogeneous		100% Non-fibrous (other)	None Detected
WC-B03-WBM4-01 <i>041511840-0064</i>		Gray Non-Fibrous Homogeneous		100% Non-fibrous (other)	None Detected

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Test Report: Asbestos Analysis of Bulk Materials via EPA 600/R-93/116 Method using Polarized Light Microscopy

Sample	Description	Appearance	Non-Asbestos		Asbestos
			% Fibrous	% Non-Fibrous	% Type
WC-B03-WBM4-02 <i>041511840-0065</i>		Gray Non-Fibrous Homogeneous		100% Non-fibrous (other)	None Detected
WC-B03-WBM4-03 <i>041511840-0066</i>		Gray/Black Non-Fibrous Homogeneous		100% Non-fibrous (other)	None Detected

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