



Technical Memorandum

1 Tech Drive, Suite 310
Andover, MA 01810

T: 978.794.0336

Prepared for: Aggregate Industries

Project Title: Swampscott Quarry – Review of Dust Sample Results

Project No.: 151967.106

Date: December 17, 2019

To: Jarrett Temple

From: Tamara Sorell, Brown and Caldwell

Copy to: Stephanie Herbster, Aggregate Industries
Shelby Hundley, Aggregate Industries

Prepared by: Tamara L. Sorell
Tamara L. Sorell, PhD, BCES, Managing Principal

Reviewed by: Lynette Gerbert
Lynette Gerbert, Principal Toxicologist

Limitations:

This document was prepared solely for Aggregate Industries in accordance with professional standards at the time the services were performed and in accordance with the contract between Aggregate Industries and Brown and Caldwell dated November 13, 2019. This document is governed by the specific scope of work authorized by Aggregate Industries; it is not intended to be relied upon by any other party except for regulatory authorities contemplated by the scope of work. We have relied on information or instructions provided Aggregate Industries and other parties and, unless otherwise expressly indicated, have made no independent investigation as to the validity, completeness, or accuracy of such information.

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Section 1: Background

Aggregate Industries (Aggregate) operates a quarry at 30 Danvers Road in Swampscott, Massachusetts. Aggregate contracted with Tech Environmental to collect a representative sample of expelled materials from the rock drill. Tech Environmental collected a sample on November 1, 2019 and submitted the sample to EMSL Analytical, Inc. (EMSL) for analysis of crystalline silica by Method Modified OSHA ID-142 X-Ray Diffraction (XRD) and Modified NIOSH Method 7500, and for Target Analyte Metals (TAL), which includes two nonmetals (arsenic and selenium).

Aggregate requested that Brown and Caldwell (BC) review these results to better understand potential health risks to human health and the environment.

Section 2: Results

Table 1 presents the analytical data and screening results. The EMSL laboratory report appears in Attachment 1. EMSL only reported results, with no quality control information. Therefore, BC did not perform a data quality review and cannot attest to the validity of the laboratory analysis, but only the results relative to established thresholds.

For all but the detected arsenic concentration, the bulk results did not exceed United States Environmental Protection Agency (USEPA) Regional Screening Levels (RSLs) for soil or Massachusetts Department of Environmental Protection (MassDEP) Method 1 S-1 soil standards, which are protective of direct contact (incidental ingestion, dermal contact and dust inhalation) by residents (all life stages).

The EPA RSLs are non-enforceable hypothetical risk-based values based on conservative assumptions about toxicity and exposure. Cancer-based RSLs assume daily exposure over a 30-year residency period that includes sensitive early life stages. Noncancer-based RSLs assume exposure from birth to six years (early life stages). Residents are assumed to be exposed via accidental ingestion, skin contact over large portions of the body, and inhalation of dust based on default assumptions about soil suspension in air. The RSLs are intended to be protective in all climates; there is no allowance for reduced exposures due to clothing or limited outdoor time in cold or wet periods. The RSLs are for screening and were not developed as risk management (e.g., clean-up) standards.

The MassDEP S-1 standards were developed as clean-up standards and while they are also risk-based (assumptions differ slightly from EPA but they also consider long-term, full-time exposure), they also account for typical background concentrations.

The consideration of background is why the arsenic RSL and S-1 values are so different.

While the arsenic concentration was above its RSL, the concentration was well below the Method 1 S-1 soil standard, which, as discussed above, is based on background concentrations in soil. MassDEP has established a background concentration of 20 mg/kg for background in soils state wide. Concentrations below that are not subject to clean-up or other risk management in Massachusetts.

Thallium was undetected but at a higher concentration than the soil screening levels due to the concentration reported at detection limit of the analysis methodology. These results indicate that direct contact with the dust material analyzed may not be a significant health concern.

It should be noted there is substantial uncertainty associated with this screening evaluation since only one sample was collected (which may not be representative of the quarry material overall). It should also be noted that this analysis was performed on on-site soils and that neither ambient dust concentrations in the

community nor airborne chemicals were measured. Therefore, BC cannot draw any conclusions regarding dust exposures.

Section 3: Conclusions

Based on this screening evaluation, no concentrations in the bulk dust sample, except one as noted above, exceed direct contact benchmarks. However, the contribution of this material to dust in residential areas is unknown.



Table 1
Summary of Results and Risk Screening

Parameter	Result (mg/kg)	EPA Soil RSL (mg/kg)	Exceeded?	MassDEP Method 1 S1 Soil Standard (mg/kg)	Exceeded?
Silica (a-Quartz)	118000				
Silica (Cristobalite)	33000				
Silica (Tridymite)	1000 U				
Total Silica (crystalline)	151000	4300000	NO	--	N/A
Aluminum	5000 D	77000	NO	--	N/A
Antimony	7.0	31	NO	20	NO
Arsenic	2.8	0.68	YES	20	NO
Barium	18	15000	NO	1000	NO
Beryllium	0.70	160	NO	90	NO
Cadmium	4 UD	71	NO	70	NO
Chromium	20	120000	NO	1000	NO
Cobalt	14	23	NO	--	N/A
Copper	22	3100	NO	--	N/A
Iron	25000 D	55000	NO	--	N/A
Lead	1.5	400	NO	200	NO
Manganese	120	1800	NO	--	N/A
Nickel	15	1500	NO	600	NO
Selenium	2 U	390	NO	400	NO
Silver	2.5	390	NO	100	NO
Thallium	20 UD	0.78	Unknown	8	Unknown
Vanadium	83	390	NO	400	NO
Zinc	53	23000	NO	1000	NO
Mercury	0.045 U	23	NO	20	NO

All values in milligrams per kilogram (mg/kg)

U - Not detected at the reporting limits shown

D - Analyzed as a secondary dilution

RSL - Regional Screening Level for Residents

Method 1 S1 standard - for unrestricted residential settings

<https://www.mass.gov/files/documents/2016/08/ni/inh0708.pdf>

N/A - Not applicable (no screening level)

Dashes indicate no value available. Note that calcium, magnesium, potassium and sodium are considered "nutritional elements" and are not evaluated for risk

Attachment A: EMSL Report



November 12, 2019

Mr. Jarrett Temple
Region Manager Land + Environment
Aggregate Industries Northeast Region, Inc.
1715 Broadway
Saugus, MA 01906

Re: Quarry Dust Sampling & Analysis, Swampscott, MA

Ref. 4513

Dear Mr. Temple:

Tech Environmental, Inc. (Tech) collected a sample of expelled materials from the rock drill at the Aggregate Industries (AI) quarry operation at 30 Danvers Road in Swampscott, MA, and arranged for its analysis for composition of silica and metals. Tech collected the sample of expelled materials from the rock drill on Friday, November 1, 2019, and shipped it to EMSL Analytical, Inc. in Cinnaminson, NJ for analysis. EMSL Analytical, Inc. analyzed the sample for its compositions of silica and metals at their laboratories in Cinnaminson, NJ. The EMSL Analytical, Inc. laboratory reports are attached to this letter. The attached table summarizes the laboratory results.

Please call if you have any questions.

Sincerely yours,

TECH ENVIRONMENTAL, INC.



Marc C. Wallace, QEP, INCE
Vice President
4513/AI Swampscott Quarry Dust Sampling

**SUMMARY OF LABORATORY RESULTS
FOR SWAMPOSCOTT QUARRY SAMPLE**

Material	Concentration (% by weight)	Laboratory Analysis
Silica (a-Quartz)	11.80%	Crystalline Silica by NIOSH 7500 Mod
Silica (Cristobalite)	3.30%	
Silica (Tridymite)	<0.1%*	
Aluminum (Al)	0.50%	TAL Metals (23) via 6010C/7471B
Antimony (Sb)	0.001%	
Arsenic (As)	0.0003%	
Barium (Ba)	0.002%	
Beryllium (Be)	0.0001%	
Cadmium (Cd)	<0.0004%*	
Calcium (Ca)	0.73%	
Chromium (Cr)	0.002%	
Cobalt (Co)	0.001%	
Copper (Cu)	0.002%	
Iron (Fe)	2.50%	
Lead (Pb)	0.0002%	
Magnesium (Mg)	0.38%	
Manganese (Mn)	0.01%	
Mercury (Hg)	<0.000005%*	
Nickel (Ni)	0.002%	
Potassium (K)	0.11%	
Selenium (Se)	<0.0002%*	
Silver (Ag)	0.0003%	
Sodium (Na)	0.04%	
Thallium (Tl)	<0.002%*	
Vanadium (V)	0.01%	
Zinc (Zn)	0.01%	

* These compounds were not detected (ND) at the reporting limit. The value presented is the reporting limit (RL) for that silica species or metal analysis.



EMSL Analytical, Inc.

200 Route 130 North, Cinnaminson, NJ 08077
Phone: (856) 858-4800

Attn. *Matthew Riegert*
Tech Environmental, Inc.
303 Wyman Street, Suite 295
Waltham, MA 02451
mriegert@techenv.com
Phone: 781-890-2220

EMSL Case No.: 361902907
Sample(s) Received: 11/5/2019
Date of Reporting: 11/7/2019
Date Printed: 11/7/2019
Reported By: J Hu

- Laboratory Report -

Crystalline Silica by NIOSH 7500 Mod

Project: Swampscott

Procurement of Samples and Analytical Overview:

The material for analysis (one bulk sample) arrived at EMSL Analytical (Cinnaminson, NJ) on November 5, 2019. The package arrived in satisfactory condition with no evidence of damage to the contents. The purpose of the analysis is to determine the quantity of crystalline silica in the material. The data reported herein has been obtained using the following equipment and methodologies.

Methods & Equipment: X-ray Diffraction (XRD)

Modified NIOSH 7500 – Silica, Crystalline
Modified OSHA ID-142 – Crystalline Silica, Quartz and Cristobalite

Analyzed by:

Jian Hu, Ph.D.
Seniors Laboratory Scientist

November 6, 2019

Date

Reviewed/Approved:

Eugenia Mirica, Ph.D.
Laboratory Manager

November 7, 2019

Date



Attn. *Matthew Riegert*
Tech Environmental, Inc.
303 Wyman Street, Suite 295
Waltham, MA 02451
mriegert@techenv.com
Phone: 781-890-2220

EMSL Case No.: 361902907
Sample(s) Received: 11/5/2019
Date of Reporting: 11/7/2019
Date Printed: 11/7/2019
Reported By: J Hu

Results and Discussion:

**Silica, Crystalline Analysis of Bulk Material
Performed X-Ray Diffraction (XRD) Method Modified OSHA ID-142 & Modified
NIOSH Method 7500, Issue 4, 3/15/03**

Sample ID	Description	α -Quartz (wt%)	Cristobalite (wt%)	Tridymite (wt%)
Swampscott 361902907-0001	Drill Filings	11.8	3.3	<0.1

Notes:

1. Reporting limit (Quartz, Cristobalite, Tridymite) = 0.1 wt%
2. Cristobalite may be overestimated due to interference by feldspar



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Waltham, MA 02451
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Phone: 781-890-2220

EMSL Case No.: 361902907
Sample(s) Received: 11/5/2019
Date of Reporting: 11/7/2019
Date Printed: 11/7/2019
Reported By: J Hu

Important Terms, Conditions, and Limitations:

Sample Retention: Samples analyzed by EMSL will be retained for 60 days after analysis date. Storage beyond this period is available for a fee with written request prior to the initial 30 day period. Samples containing hazardous/toxic substances which require special handling may be returned to the client immediately. EMSL reserves the right to charge a sample disposal or return shipping fee.

Change Orders and Cancellation: All changes in the scope of work or turnaround time requested by the client after sample acceptance must be made in writing and confirmed in writing by EMSL. If requested changes result in a change in cost the client must accept payment responsibility. In the event work is cancelled by a client, EMSL will complete work in progress and invoice for work completed to the point of cancellation notice. EMSL is not responsible for holding times that are exceeded due to such changes.

Warranty: EMSL warrants to its clients that all services provided hereunder shall be performed in accordance with established and recognized analytical testing procedures, when available. The foregoing express warranty is exclusive and is given in lieu of all other warranties, expressed or implied. EMSL disclaims any other warranties, express or implied, including a warranty of fitness for particular purpose and warranty of merchantability.

Limits of Liability: In no event shall EMSL be liable for indirect, special, consequential, or incidental damages, including, but not limited to, damages for loss of profit or goodwill regardless of the negligence (either sole or concurrent) of EMSL and whether EMSL has been informed of the possibility of such damages, arising out of or in connection with EMSL's services thereunder or the delivery, use, reliance upon or interpretation of test results by client or any third party. We accept no legal responsibility for the purposes for which the client uses the test results. EMSL will not be held responsible for the improper selection of sampling devices even if we supply the device to the user. The user of the sampling device has the sole responsibility to select the proper sampler and sampling conditions to insure that a valid sample is taken for analysis. Any resampling performed will be at the sole discretion of EMSL, the cost of which shall be limited to the reasonable value of the original sample delivery group (SDG) samples. In no event shall EMSL be liable to a client or any third party, whether based upon theories of tort, contract or any other legal or equitable theory, in excess of the amount paid to EMSL by client thereunder.

The data and other information contained in this report, as well as any accompanying documents, represent only the samples analyzed. They are reported upon the condition that they are not to be reproduced wholly or in part for advertising or other purposes without the written approval from the laboratory.



EMSL ANALYTICAL, INC.
LABORATORY • PRODUCTS • TRAINING

Industrial Hygiene Chain of Custody

EMSL Order Number (Lab Use Only):

361902907

EMSL ANALYTICAL, INC.
200 ROUTE 130 NORTH
CINNAMINSON, NJ 08077
PHONE: (800) 220-3675
FAX: (856) 858-3502

OrderID: 361902907

Report To Contact Name: Matthew Riegert			Bill To Company: Tech Environmental, Inc.			Client ID #:					
Company Name: Tech Environmental, Inc.			Attention To: Matthew Riegert								
Street: 303 Wyman Street, Suite 295			Street: 303 Wyman Street, Suite 295								
City: Waltham		State/Province: MA		Zip/Postal Code: 02451		City: Waltham		State/Province: MA		Zip/Postal Code: 02451	
Phone: 781-890-2220			Fax: 781-890-9451			Phone: 781-890-2220			Fax: 781-890-9451		
Project Name: Swampscott				Email Results To: mriegert@techenv.com				U.S. State where Samples Collected: MA			
# Samples in Shipment:		Date of Shipment: 11-4-19		Purchase Order: 4513		Sampled By (Signature):					

Turnaround Time (TAT) – Please Check: If No Selection Made, Standard 2 Week TAT Will Apply							Media Type:				
<input type="checkbox"/> 2 Week	<input type="checkbox"/> 1 Week	<input type="checkbox"/> 4 Day	<input type="checkbox"/> 3 Day	<input checked="" type="checkbox"/> 2 Day	<input type="checkbox"/> 1 Day	<input type="checkbox"/> Other (Call Lab)	Manufacturer/Part #:			Lot #:	

Client Sample ID	Location/Description	Analyte / Method	Media	Flow (lpm)	Sample Time		Volume / Area	Sample Type	Sample Date	Comments
					On	Off				
Swampscott	Drill Filings	Silica - All	Soil	NA	10:00	NA	NA	<input checked="" type="checkbox"/> Area <input type="checkbox"/> Personal	11-1-19	Silica-Crystalline, 3 Species, Bulk
								<input type="checkbox"/> Area <input type="checkbox"/> Personal		
								<input type="checkbox"/> Area <input type="checkbox"/> Personal		
								<input type="checkbox"/> Area <input type="checkbox"/> Personal		
								<input type="checkbox"/> Area <input type="checkbox"/> Personal		
								<input type="checkbox"/> Area <input type="checkbox"/> Personal		
								<input type="checkbox"/> Area <input type="checkbox"/> Personal		
								<input type="checkbox"/> Area <input type="checkbox"/> Personal		

RECEIVED
EMSL
CINNAMINSON, NJ
2019 NOV - 5 A 9:47

Note: Most NIOSH and OSHA methods require field blanks. It is the IH field sampler's responsibility to submit the proper number of field blanks and duplicates.

Released By	Date	Received By	Date
	11/4/19	Bob FY 945	11/5/19

Comments:

2/B



EMSL Analytical, Inc.

200 Route 130 North, Cinnaminson, NJ 08077

Phone: (856) 303-2500 Fax: (856) 858-4571 Email: EnvChemistry2@emsl.com

Attn:

MATT RIEGERT
Tech Environmental, Inc.
303 Wyman Street
Suite 295
Waltham, MA 02451

11/11/2019

Phone: (781) 890-2220

Fax: (781) 890-9451

The following analytical report covers the analysis performed on samples submitted to EMSL Analytical, Inc. on 11/5/2019. The results are tabulated on the attached data pages for the following client designated project:

Swampscott

The reference number for these samples is EMSL Order #011914127. Please use this reference when calling about these samples. If you have any questions, please do not hesitate to contact me at (856) 303-2500.

Approved By:

Phillip Worby, Environmental Chemistry
Laboratory Director



The test results contained within this report meet the requirements of NELAP and/or the specific certification program that is applicable, unless otherwise noted.
NELAP Certifications: NJ 03036, NY 10872, PA 68-00367, CA ELAP 1877

The CRM recovery for Sodium was outside of the method control limits (high).

The QC sample duplicate RPD results for Calcium, Manganese, Zinc and Mercury were outside of the method control limits.

The samples associated with this report were received in good condition unless otherwise noted. This report relates only to those items tested as received by the laboratory. The QC data associated with the sample results meet the recovery and precision requirements established by the NELAP, unless specifically indicated. All results for soil samples are reported on a dry weight basis, unless otherwise noted. This report may not be reproduced except in full and without written approval by EMSL Analytical, Inc.

**EMSL Analytical, Inc.**

200 Route 130 North, Cinnaminson, NJ 08077

Phone/Fax: (856) 303-2500 / (856) 858-4571

<http://www.EMSL.com>EnvChemistry2@emsl.com

EMSL Order: 011914127

CustomerID: TECH63

CustomerPO: 4513

ProjectID:

Attn: **MATT RIEGERT**
Tech Environmental, Inc.
303 Wyman Street
Suite 295
Waltham, MA 02451

Phone: (781) 890-2220
 Fax: (781) 890-9451
 Received: 11/05/19 9:25 AM

Project: **Swampscott****Analytical Results****Client Sample Description** Swampscott**Collected:** 11/1/2019
10:00:00 AM**Lab ID:** 011914127-0001

Method	Parameter	Result	RL	Units	Prep Date & Analyst	Analysis Date & Analyst
METALS						
3050B/6010D	Aluminum	5000 D		99 mg/Kg	11/7/2019 AM	11/11/19 16:08 PV
3050B/6010D	Antimony	7.0		2.0 mg/Kg	11/7/2019 AM	11/08/19 18:36 DM
3050B/6010D	Arsenic	2.8		2.0 mg/Kg	11/7/2019 AM	11/08/19 18:36 DM
3050B/6010D	Barium	18		9.9 mg/Kg	11/7/2019 AM	11/08/19 18:36 DM
3050B/6010D	Beryllium	0.70		0.40 mg/Kg	11/7/2019 AM	11/08/19 18:36 DM
3050B/6010D	Cadmium	ND D		4.0 mg/Kg	11/7/2019 AM	11/11/19 16:08 PV
3050B/6010D	Calcium	7300 D		990 mg/Kg	11/7/2019 AM	11/11/19 16:08 PV
3050B/6010D	Chromium	20		0.99 mg/Kg	11/7/2019 AM	11/08/19 18:36 DM
3050B/6010D	Cobalt	14		0.99 mg/Kg	11/7/2019 AM	11/08/19 18:36 DM
3050B/6010D	Copper	22		2.0 mg/Kg	11/7/2019 AM	11/08/19 18:36 DM
3050B/6010D	Iron	25000 D		990 mg/Kg	11/7/2019 AM	11/11/19 16:08 PV
3050B/6010D	Lead	1.5		0.99 mg/Kg	11/7/2019 AM	11/08/19 18:36 DM
3050B/6010D	Magnesium	3800		99 mg/Kg	11/7/2019 AM	11/08/19 18:36 DM
3050B/6010D	Manganese	120		1.5 mg/Kg	11/7/2019 AM	11/08/19 18:36 DM
3050B/6010D	Nickel	15		2.0 mg/Kg	11/7/2019 AM	11/08/19 18:36 DM
3050B/6010D	Potassium	1100		99 mg/Kg	11/7/2019 AM	11/08/19 18:36 DM
3050B/6010D	Selenium	ND		2.0 mg/Kg	11/7/2019 AM	11/08/19 18:36 DM
3050B/6010D	Silver	2.5		0.99 mg/Kg	11/7/2019 AM	11/08/19 18:36 DM
3050B/6010D	Sodium	350		99 mg/Kg	11/7/2019 AM	11/08/19 18:36 DM
3050B/6010D	Thallium	ND D		20 mg/Kg	11/7/2019 AM	11/11/19 16:08 PV
3050B/6010D	Vanadium	83		0.99 mg/Kg	11/7/2019 AM	11/08/19 18:36 DM
3050B/6010D	Zinc	53		2.0 mg/Kg	11/7/2019 AM	11/08/19 18:36 DM
7471B	Mercury	ND		0.045 mg/Kg	11/11/2019 SW	11/11/19 0:00 SW
WET						
SM 2540G	Total Solids	98		N/A %	11/6/2019 RD	11/06/19 0:00 RD

Definitions:

MDL - method detection limit

J - Result was below the reporting limit, but at or above the MDL

ND - indicates that the analyte was not detected at the reporting limit

RL - Reporting Limit (Analytical)

D - Dilution



EMSL ANALYTICAL, INC.
LABORATORY PRODUCTS & TRAINING

Environmental Chemistry Chain of Custody

EMSL Order Number (Lab Use Only):

011914127

PHONE:
FAX:

Report To Contact Name: Matthew Riegert				Bill To Company: Tech Environmental, Inc. (TECH63)							
Company Name: Tech Environmental, Inc.				Attention To: Matthew Riegert							
Street: 303 Wyman Street, Suite 295				Street: 303 Wyman Street, Suite 295							
City: Waltham		State/Province: MA		Zip/Postal Code: 02451		City: Waltham					
Phone: 781-890-2220		Fax: 781-890-9451		Phone: 781-890-2220		Fax: 781-890-9451					
Project Name: Swampscott				Email Results To: mriegert@techenv.com		Purchase Order: 4513					
U.S. State where Samples Collected: MA				Number of Samples in Shipment:		Date of Shipment: 11-4-19					
Sample for Compliance? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> If yes, NPDES? <input type="checkbox"/> Other (Specify): NA				PWS ID #: NA		State Reporting Required? (Y/N) <u>N</u>					
Samples Collected by: EMSL <input type="checkbox"/> Client <input checked="" type="checkbox"/> check one				Sampled By (Signature):		Samples Received Chilled? (Y/N) <u>N</u>					
Standard Turnaround Time: <input type="checkbox"/> 2 Weeks				The following TATs are subject to lab approval: <input type="checkbox"/> 1 Week <input type="checkbox"/> 4 Days <input type="checkbox"/> 3 Days <input checked="" type="checkbox"/> 2 Days <input type="checkbox"/> 1 Day							
Failure to complete will hinder processing of samples				Matrix	Preservative	List Test(s) Needed				Comments	
Client Sample ID	Comp	Grab	Collect Date/Time	W=Water S=Soil A=Air SL=Sludge O= Other	1=HCL 2=HNO3 3=H2SO4 4=ICE 5=Other	TAL Meta ls (23)	Field pH	Field pH Test Time	Field Temp. Deg C	Field Temp. Test Time	
Swampscott	<input checked="" type="checkbox"/>	<input type="checkbox"/>	11-1-19 / 10:00	SOIL	NA	X					TAL METALS (23)
	<input type="checkbox"/>	<input type="checkbox"/>									
	<input type="checkbox"/>	<input type="checkbox"/>									
	<input type="checkbox"/>	<input type="checkbox"/>									
	<input type="checkbox"/>	<input type="checkbox"/>									
Released By (Signature)			Date & Time			Received By			Date & Time		
			11/4/19 4pm						11/5 9:25 am		
Please indicate reporting requirements: <input type="checkbox"/> Results Only <input type="checkbox"/> Results and QC <input type="checkbox"/> Reduced Deliverables <input type="checkbox"/> Disk Deliverable <input type="checkbox"/> Other _____											
Instructions or Comments: Email change TAT to 4 day. 11/5 MF											

Note: Field pH and Field Temperature are tested on the same day as the date of sample collection.

(Lab) Received Temperature: 21 °C