

Memo

To: Mark Wanke, Franklin Development, Lorraine Robles, SAHA
From: Mark Norman, Geo-Marine
CC: Bob Delgado, Kevin Morrison, Geo-Marine
Transmitted: Via Email
Date: October 17, 2008
Re: Summary of Coal Ash Analytical Evaluation, 1901 S. San Marcos Street, San Antonio, Texas

A complete analytical evaluation of the composition of the coal ash was performed to confirm that constituents of concern were present in the coal ash at concentrations which would necessitate removal of the coal ash from the site. The analytical evaluation is summarized below.

Three samples of the coal ash (Coal Ash, Coal Ash 2, and Coal Ash 3) were collected on October 8 and 14, 2008 and submitted for the following laboratory analyses: Volatile Organic Constituents (VOCs), Semi-volatile Organic Constituents (SVOCs), Polynuclear Aromatic Hydrocarbons (PAHs), Total Petroleum Hydrocarbons (TPH) and RCRA 8 Metals.

No VOCs or TPH were detected in the coal ash samples.

Fourteen PAHs were detected in the three coal ash samples. However, none of the PAH concentrations exceeded their respective Tier 1 Residential Protective Concentration Levels (PCLs) (See Attached Table 1, Summary of PAHs Detected in Coal Ash Samples).

One coal ash sample (Coal Ash 2) was analyzed for RCRA 8 Metals. As summarized in the attached Table 2 (Summary of Metals Detected in Coal Ash Samples), four metals concentrations (arsenic, chromium, lead, and selenium) exceed their respective Texas-Specific Background Concentration and/or Tier 1 Residential PCLs. These metals exceedances preclude the coal ash from remaining on-site.

I have ordered one final laboratory analysis on Coal Ash 2. It is a Synthetic Precipitation Leachate Procedure (SPLP) for arsenic, chromium, lead and selenium. If the four metals do not leach above their respective Drinking Water PCLs, then the coal ash can remain on-site. However, if the leachate from any of the four metals exceeds the Drinking Water PCLs, the coal ash must be removed from the site and disposed of at an appropriate landfill facility off-site. Due to the laboratory time involved in the SPLP analysis, the soonest I will have the SPLP results is Thursday, October 23, 2008.

If you have any questions or need further information, please do not hesitate to contact me by phone at (210) 861-2814 or by email at mnorman@geo-marine.com.

