



March 20, 2024

Project No. GL20409062.000

Gerald F. Wick, P.G.

Texas Commission on Environmental Quality
Industrial & Hazardous Waste Permits Section
Waste Permits Division
MQ-130
12100 Park 35 Circle
Austin, Texas 78753

**RE: AIR MONITORING RESULTS – MARCH 7,2024/MARCH 11, 2024
AFFECTED PROPERTY 5 EXCAVATION
FRISCO COMMUNITY DEVELOPMENT CORPORATION, 7471 OLD FIFTH ST, FRISCO, TEXAS
TCEQ SWR NO. 30516, CN600129779, RN100218643
TCEQ HAZARDOUS WASTE PERMIT NO. 50206**

DEAR MR. WICK:

WSP USA Inc. (WSP) on behalf of the Frisco Community Development Corporation (FCDC) has prepared this Summary of air monitoring results from March 7th to March 11th, 2024, for the Affected Property 5 Soil Excavation performed for the Frisco Community Development Site (FCDS) located at 7471 Old Fifth St, Frisco, Texas (Site).

Dust suppression measures were implemented during soil excavation activities. Air quality was monitored during all potential dust generating activities as specified by the Air Monitoring Plan utilizing E-Samplers. Air monitoring included upwind (direction from which wind is blowing) and downwind (direction wind is blowing) real-time measurements of wind speed, wind direction and particulate matter at the perimeter of the FOP/RCA soil management area. Dust generating activities were conducted on March 7th, March 8th and 11th during this period. In addition to the real-time air monitoring, air samples were collected for laboratory analysis on March 11th of both lead and cadmium as described in the Air Monitoring Plan using high volume (10 liters per minute [L/min]) particulate matter air samplers.

Review of air monitoring results, indicate that no real-time particulate concentrations or laboratory analytical results exceeded Take Action or Stop Work Levels, respectively. **Table 1** provides a summary of laboratory analytical air monitoring data collected during this reporting period. Real-time air monitoring Daily Summary Reports are included as **Attachment A**. A laboratory analytical report and Data Usability Summary (DUS) are included as **Attachment B**.

Please do not hesitate to call should you have any questions regarding this summary report.

Sincerely,

WSP USA, Inc.



Catherine Mear, GIT
Environmental Scientist, Consultant



Timothy P. Jennings, PG (TX)
Assistant Vice President, Geologist

CC: TCEQ Austin – 1 electronic copy
TCEQ Region 4 – 1 electronic copy
Wes Pierson – Frisco City Manager (City of Frisco) – 1 electronic copy
Mack Borchardt – Special Assistant to the City Manager – City of Frisco – 1 electronic copy
Jason Brodigan – Interim Director of Engineering Services (City of Frisco) – 1 electronic copy
Brad Weaver – City of Frisco – 1 electronic copy

TABLE



TABLE 1
SUMMARY OF AIR MONITORING LABORATORY ANALYTICAL RESULTS
March 7, 2024 - March 11, 2024

Frisco CDC Site
Frisco, Texas
IHW Permit No. 50206

Sample ID ¹	Date	Cadmium ²	Lead ²
		mg/m ³	
FOPR240311DW827	3/11/2024	<0.0000046	<0.000031
FOPR240311DW659		<0.0000045	<0.000030
FOPR240311UW915		<0.0000046	<0.000031
FOPR240311DW917		<0.0000044	<0.000029
FOPR240311DW916		<0.0000043	<0.000028
Stop Work Level - 60 minute average ³		0.0001	0.00107

Notes:

¹Samples collected by Remediation Services, Inc. and analyzed by ALS Environmental in Salt Lake City, Utah.

²Cadmium and lead analyzed via NIOSH Method 7300 Mod., MCE.

³Particulate matter take action and stop work levels for cadmium and lead as detailed in the Former Operating Plant Air Monitoring Plan, April 2023, prepared by WSP USA, Inc.
J - The reported value is an estimate.

Bold analytical results indicate sample detections.

Analytical results reported in milligrams per cubic meter (mg/m³).

ATTACHMENT A
Air Monitoring Summary Reports

Daily Summary Report Table (30-Min Average Values)

Real-Time Perimeter Particulate (PM-10) Monitoring Data

Frisco CDC Site - Frisco, TX

3/7/2024



Time Interval (30-min)	Station 1 (C15983-2) (mg/m3)	Station 2 (U15963) (mg/m3)	Station 3 (T19915) (mg/m3)	Station 4 (T19917) (mg/m3)	Station 5 (T19916) (mg/m3)	Wind Direction (from N)	Wind Speed (mph)
06:00-06:29						133	5.9
06:30-06:59	0.007	0.005	0.002	0.002	0.009	138	7.2
07:00-07:29	0.007	0.007	0.006	0.002	0.004	143	7.5
07:30-07:59	0.012	0.012	0.010	0.004	0.007	167	8.3
08:00-08:29	0.014	0.015	0.012	0.011	0.012	188	6.7
08:30-08:59	0.015	0.015	0.013	0.013	0.013	207	6.4
09:00-09:29	0.015	0.015	0.015	0.013	0.015	254	3.0
09:30-09:59	0.012	0.012	0.012	0.010	0.013	236	3.1
10:00-10:29	0.009	0.009	0.008	0.007	0.009	175	7.5
10:30-10:59	0.011	0.011	0.010	0.010	0.011	165	10.4
11:00-11:29	0.010	0.010	0.010	0.010	0.010	167	13.9
11:30-11:59	0.010	0.009	0.009	0.008	0.011	161	13.2
12:00-12:29	0.009	0.009	0.008	0.009	0.010	168	11.9
12:30-12:59	0.009	0.009	0.008	0.011	0.009	156	10.5
13:00-13:29	0.008	0.008	0.008	0.006	0.007	156	10.1
13:30-13:59	0.009	0.009	0.008	0.008	0.006	5	0.3
14:00-14:29	0.011	0.010	0.011	0.011	0.009	342	2.8
14:30-14:59	0.007	0.007	0.008	0.010	0.009	14	4.2
15:00-15:29	0.006	0.005	0.006	0.007	0.006	357	4.3
15:30-15:59	0.006	0.005	0.005	0.006	0.005	16	5.4
16:00-16:29	0.005	0.005	0.005	0.005	0.005	346	8.9
16:30-16:59					0.004	359	7.9
17:00-17:29						13	4.9
17:30-17:59						34	3.5
18:00-18:29						56	5.5
18:30-18:59						89	7.8
Daily Average	0.010	0.009	0.009	0.008	0.009	133	7.0

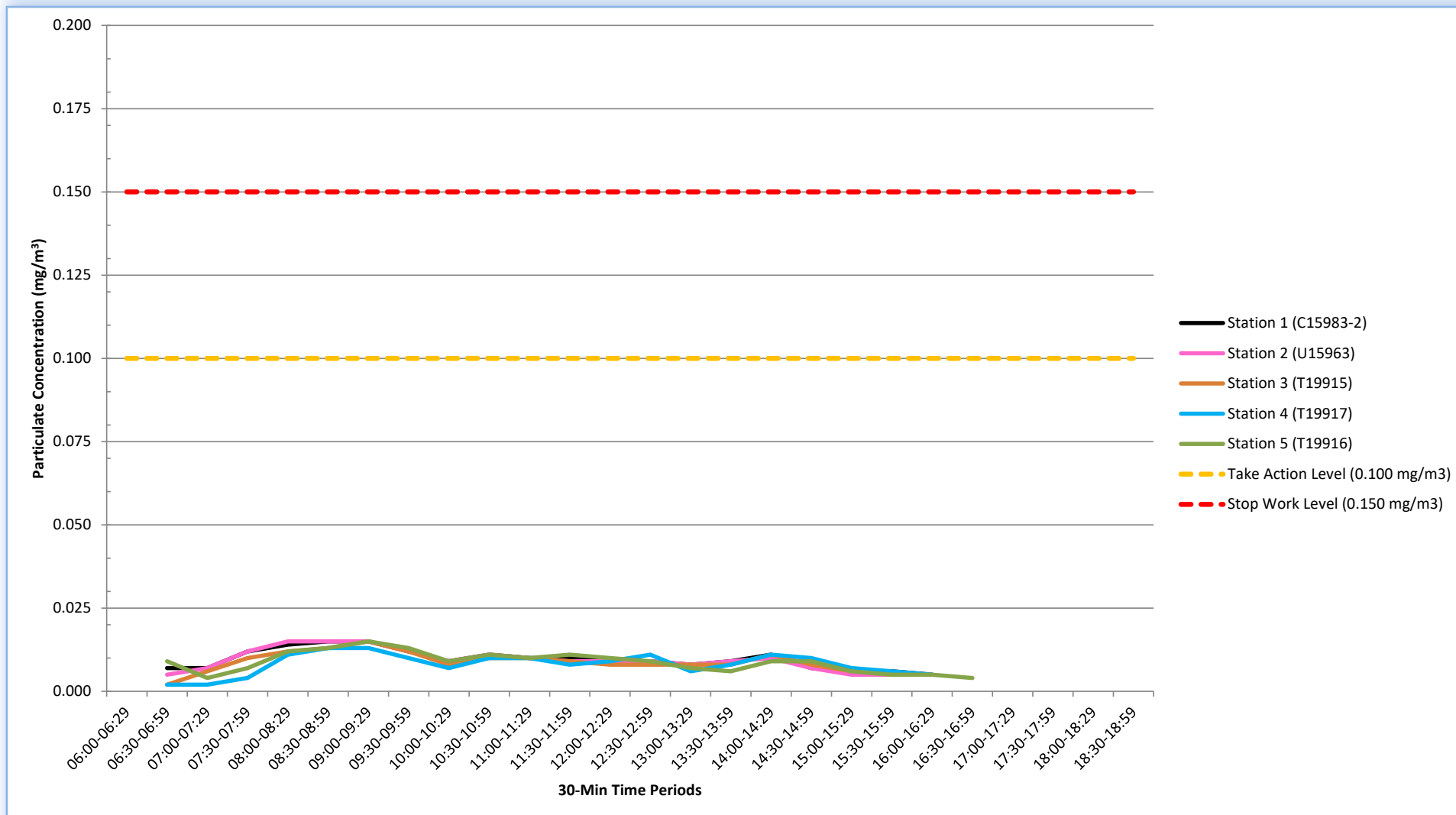
Notes:

- Blank data records indicate no data is available for that interval
- Average Wind Direction calculated with unit vector averaging method

Daily Summary Report Graph
(30-Min Average Values)
Real-Time Perimeter Particulate (PM-10) Monitoring Data
Frisco CDC Site - Frisco, TX



3/7/2024



Daily Summary Report Table (30-Min Average Values)

Real-Time Perimeter Particulate (PM-10) Monitoring Data

Frisco CDC Site - Frisco, TX

3/8/2024



Time Interval (30-min)	Station 1 (C15983-2) (mg/m3)	Station 2 (U15963) (mg/m3)	Station 3 (T19915) (mg/m3)	Station 4 (T19917) (mg/m3)	Station 5 (T19916) (mg/m3)	Wind Direction (from N)	Wind Speed (mph)
06:00-06:29						80	7.3
06:30-06:59	0.000	0.000		0.002	0.003	33	3.0
07:00-07:29	0.000	0.000		0.000	0.002	141	5.5
07:30-07:59	0.001	0.001		0.000	0.000	144	9.9
08:00-08:29	0.001	0.000		0.001	0.000	320	3.9
08:30-08:59	0.001	0.001		0.000	0.000	0	2.8
09:00-09:29	0.001	0.001		0.002	0.001	59	5.9
09:30-09:59	0.001	0.001		0.001	0.000	47	3.7
10:00-10:29	0.001	0.001		0.002	0.000	46	4.8
10:30-10:59	0.002	0.002		0.001	0.000	39	4.8
11:00-11:29	0.002	0.002		0.001	0.001	348	9.2
11:30-11:59	0.002	0.002		0.002	0.002	347	9.3
12:00-12:29	0.002	0.002		0.002	0.002	342	9.7
12:30-12:59	0.002	0.003		0.003	0.002	339	9.0
13:00-13:29	0.002	0.002		0.002	0.001	346	10.4
13:30-13:59	0.002	0.002		0.001	0.001	343	11.2
14:00-14:29	0.001	0.001		0.001	0.002	345	10.3
14:30-14:59	0.001	0.001		0.001	0.001	345	10.1
15:00-15:29	0.001	0.001		0.004	0.001	348	10.6
15:30-15:59	0.001	0.001		0.005	0.003	342	10.7
16:00-16:29	0.003	0.003		0.011	0.004	342	10.9
16:30-16:59		0.003			0.004	340	10.8
17:00-17:29						336	10.8
17:30-17:59						329	11.4
18:00-18:29						325	11.1
18:30-18:59						331	10.2
Daily Average	0.001	0.001	0.000	0.002	0.001	356	8.4

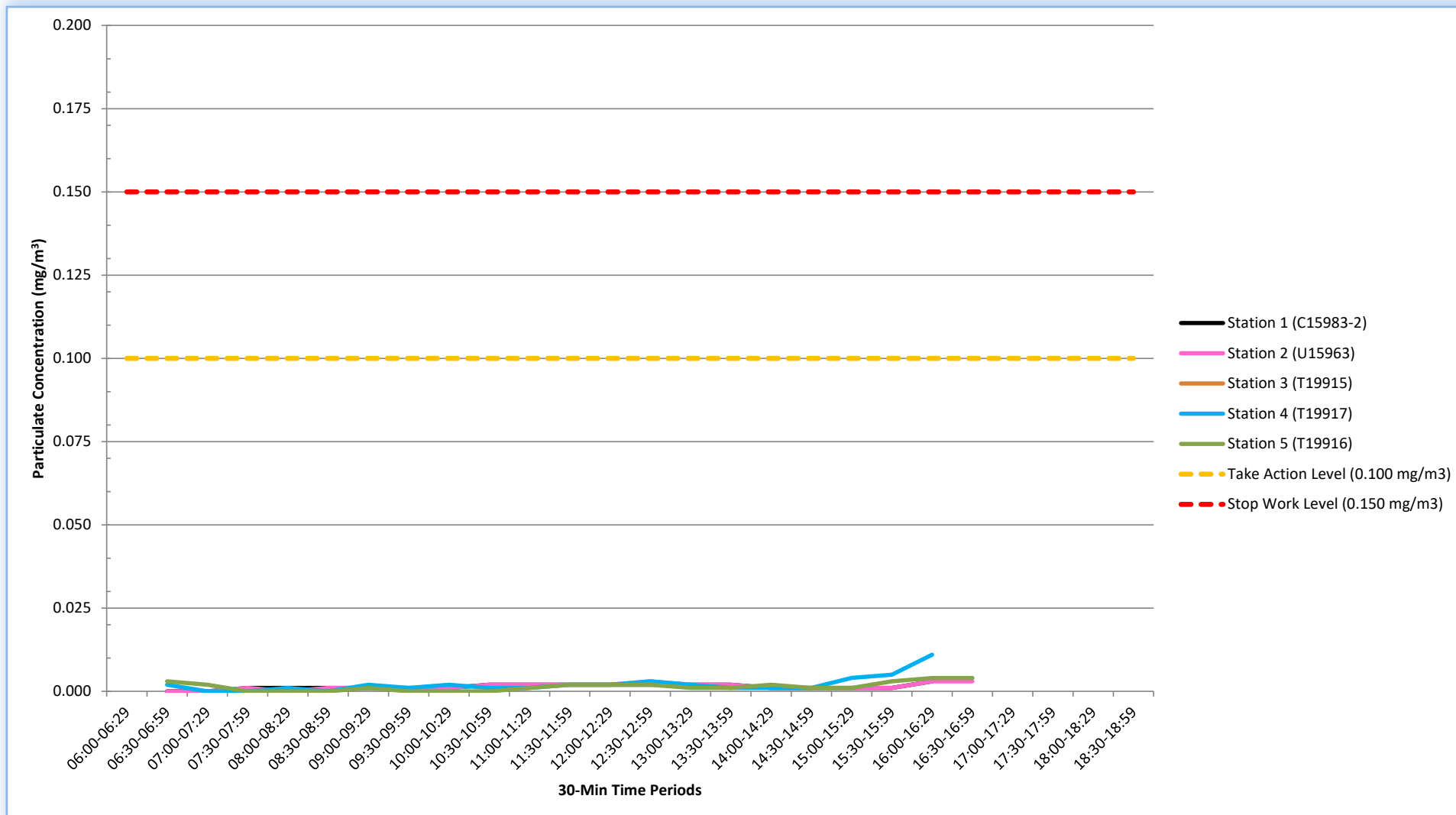
Notes:

- Blank data records indicate no data is available for that interval
- Average Wind Direction calculated with unit vector averaging method

Daily Summary Report Graph
(30-Min Average Values)
Real-Time Perimeter Particulate (PM-10) Monitoring Data
Frisco CDC Site - Frisco, TX



3/8/2024



Daily Summary Report Table (30-Min Average Values)

Real-Time Perimeter Particulate (PM-10) Monitoring Data

Frisco CDC Site- Frisco, TX

3/11/2024



Time Interval (30-min)	Station 1 (C15983-2) (mg/m3)	Station 2 (U15963) (mg/m3)	Station 3 (T19915) (mg/m3)	Station 4 (T19917) (mg/m3)	Station 5 (T19916) (mg/m3)	Wind Direction (from N)	Wind Speed (mph)
06:00-06:29						137	3.8
06:30-06:59	0.002	0.001		0.023	0.002	137	4.4
07:00-07:29	0.002	0.002		0.003	0.003	140	5.6
07:30-07:59	0.003	0.002		0.001	0.003	147	5.9
08:00-08:29	0.003	0.003		0.000	0.001	155	6.4
08:30-08:59	0.003	0.003		0.000	0.001	183	5.9
09:00-09:29	0.002	0.002		0.001	0.003	148	7.6
09:30-09:59	0.002	0.002		0.000	0.005	122	7.6
10:00-10:29	0.002	0.001		0.002	0.003	127	6.6
10:30-10:59	0.002	0.002		0.004	0.002	115	6.0
11:00-11:29	0.001	0.001		0.001	0.003	123	8.1
11:30-11:59	0.002	0.003		0.001	0.004	143	8.3
12:00-12:29	0.002	0.002		0.000	0.001	153	8.5
12:30-12:59	0.002	0.002		0.000	0.001	168	7.4
13:00-13:29	0.002	0.001		0.002	0.000	182	10.0
13:30-13:59	0.002	0.001		0.001	0.000	183	10.0
14:00-14:29	0.001	0.001		0.001	0.001	181	10.3
14:30-14:59	0.001	0.001		0.000	0.001	180	10.6
15:00-15:29	0.002	0.002			0.000	185	10.0
15:30-15:59						172	9.5
16:00-16:29						169	9.1
16:30-16:59						186	9.2
17:00-17:29						178	10.4
17:30-17:59						170	8.8
18:00-18:29						170	10.6
18:30-18:59						164	9.7
Daily Average	0.002	0.002	0.000	0.002	0.002	153	8.1

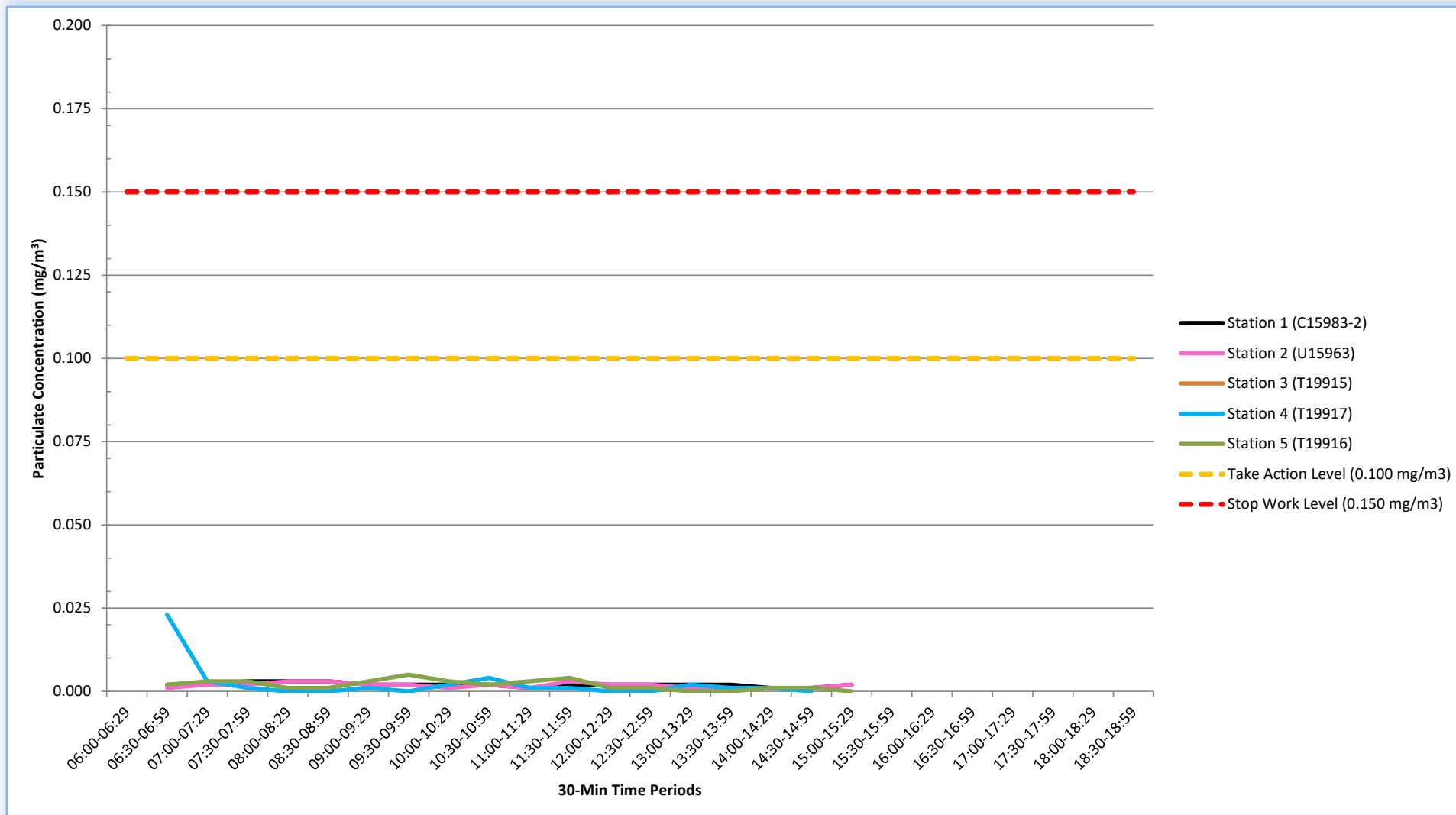
Notes:

- Blank data records indicate no data is available for that interval
- Average Wind Direction calculated with unit vector averaging method

Daily Summary Report Graph
(30-Min Average Values)
Real-Time Perimeter Particulate (PM-10) Monitoring Data
Frisco CDC Site - Frisco, TX



3/11/2024



ATTACHMENT B

Air Monitoring Laboratory Analytical Reports and Data Usability Summary

Data Usability Summary

To:	Catherine Mear	Date:	March 18, 2024
From:	William Stursberg	File:	Frisco 2024-03-18 Air Monitoring DUS.docx
RE:	Review of March Air Monitoring Data	CC:	

WSP USA Inc (WSP) reviewed one laboratory reports from ALS Environmental (Salt Lake City, Utah) providing the analytical results for air monitoring samples collected on March 11 from the Frisco Community Development Site. Quality control (QC) data was reviewed as described in RG-366/TRRP-13 (Review and Reporting of COC Concentration Data under TRRP, May 2010). The results of the review are discussed in this memorandum. Data were collected to evaluate the potential off-site exposure during remediation activities to chemicals of concern (COC).

Samples were analyzed for cadmium and lead using the analytical method listed below.

- NIOSH 7300 Mod., MCE – Elements by ICP

TCEQ does not offer accreditation for National Institute of Occupational Safety and Health (NIOSH) analytical methods. ALS is accredited by the American Industrial Hygiene Association (AIHA) for the analysis of elements by inductively coupled plasma (ICP) (Certificate 101574). Table 1 lists the sample identifications cross-referenced to laboratory identifications and the analyses performed for each sample. No data are qualified due to exceedances of QC criteria.

QUALITY CONTROL RESULTS

Field and laboratory blank concentrations and laboratory control sample precision and accuracy results were evaluated from data presented in the QC section of the laboratory report.

PRESERVATION AND HOLDING TIMES

There are no preservation or holding time requirements for NIOSH 7300.

CALIBRATIONS

No calibration data were provided in the laboratory report.

BLANKS

No analytes were detected in field or laboratory blanks.

LABORATORY CONTROL SAMPLES

Laboratory control samples (LCS) and laboratory control sample duplicate (LCSD) (if analyzed) recoveries were within the laboratory acceptance criteria of 89.8 to 111 percent recovery (%R) for cadmium and 92.5 to 112.9 %R for lead. LCS/LCSD precision (as relative percent difference [RPD]) was less than the laboratory acceptance criteria of 15 RPD.

MATRIX SPIKE/MATRIX SPIKE DUPLICATE

Matrix spike/matrix spike duplicate (MS/MSD) analyses are not applicable to the method.

FIELD PRECISION

Field duplicate (as co-located) samples were not collected.

SUMMARY

Data are usable for determining concentrations of cadmium and lead in air samples. No data were qualified by the reviewer. Note that the laboratory uses “()” to denote concentrations between the limit of detection (sample detection limit) and the limit of quantitation (method quantitation limit). This data should be considered as estimated (J).

Table 1 Cross-Reference Field Sample Identifications and Laboratory Identifications

Field Identification	Laboratory Identification	Cadmium / Lead	Comment
FOPR240311DW827	2407242001	X	
FOPR240311DW659	2407242002	X	
FOPR240311UW915	2407242003	X	
FOPR240311DW917	2407242004	X	
FOPR240311DW916	2407242005	X	
FOPR240311FB	2407242006	X	Field Blank



ANALYTICAL REPORT

Report Date: March 14, 2024

Grant Sherwood
Remediation Services, Inc.
P.O. Box 587
2735 South 10th Street
Independence, KS 67301

Phone: (620) 331-1200
Fax: (620) 331-6216
E-mail: gsherwood@rsi-ks.com

Workorder: **34-2407242**

Client Project ID: Frisco Development Corporation
Purchase Order: 22382
Project Manager: Jessica Cofrancesco

Analytical Results

Sample ID: FOPR240311DW827		Collected: 03/11/2024		
Lab ID: 2407242001		Received: 03/12/2024		
Sampling Location: Frisco Development				
Method: NIOSH 7300 Mod., MCE		Instrument: ICP13		
Dilution: 1		Prepared: 03/13/2024 (315672)		
Media: MCE Filter		Analyzed: 03/14/2024 (315713)		
Sampling Parameter: Air Volume 4907 L				
Analyte	Result (ug/sample)	Result (mg/m³)	LOD (ug/sample)	RL (ug/sample)
Cadmium	<0.023	<0.0000046	0.023	0.075
Lead	<0.15	<0.000031	0.15	0.50

Sample ID: FOPR240311DW659		Collected: 03/11/2024		
Lab ID: 2407242002		Received: 03/12/2024		
Sampling Location: Frisco Development				
Method: NIOSH 7300 Mod., MCE		Media: MCE Filter		
Dilution: 1		Instrument: ICP13		
Sampling Parameter: Air Volume 4964 L		Prepared: 03/13/2024 (315672)		
		Analyzed: 03/14/2024 (315713)		
Analyte	Result (ug/sample)	Result (mg/m³)	LOD (ug/sample)	RL (ug/sample)
Cadmium	<0.023	<0.0000045	0.023	0.075
Lead	<0.15	<0.000030	0.15	0.50

Sample ID: FOPR240311UW915		Collected: 03/11/2024		
Lab ID: 2407242003		Received: 03/12/2024		
Sampling Location: Frisco Development				
Method: NIOSH 7300 Mod., MCE		Media: MCE Filter		
Dilution: 1		Instrument: ICP13		
Sampling Parameter: Air Volume 4903 L		Prepared: 03/13/2024 (315672)		
		Analyzed: 03/14/2024 (315713)		
Analyte	Result (ug/sample)	Result (mg/m³)	LOD (ug/sample)	RL (ug/sample)
Cadmium	<0.023	<0.0000046	0.023	0.075
Lead	<0.15	<0.000031	0.15	0.50



ANALYTICAL REPORT

Workorder: **34-2407242**

Client Project ID: Frisco Development Corporation

Purchase Order: 22382

Project Manager: Jessica Cofrancesco

Analytical Results

Sample ID: FOPR240311DW917		Collected: 03/11/2024		
Lab ID: 2407242004		Received: 03/12/2024		
Sampling Location: Frisco Development				
Method: NIOSH 7300 Mod., MCE		Media: MCE Filter		
Dilution: 1		Instrument: ICP13		
Sampling Parameter: Air Volume 5162 L		Prepared: 03/13/2024 (315672)		
		Analyzed: 03/14/2024 (315713)		
Analyte	Result (ug/sample)	Result (mg/m³)	LOD (ug/sample)	RL (ug/sample)
Cadmium	<0.023	<0.0000044	0.023	0.075
Lead	<0.15	<0.000029	0.15	0.50

Sample ID: FOPR240311DW916		Collected: 03/11/2024		
Lab ID: 2407242005		Received: 03/12/2024		
Sampling Location: Frisco Development				
Method: NIOSH 7300 Mod., MCE		Media: MCE Filter		
Dilution: 1		Instrument: ICP13		
Sampling Parameter: Air Volume 5274 L		Prepared: 03/13/2024 (315672)		
		Analyzed: 03/14/2024 (315713)		
Analyte	Result (ug/sample)	Result (mg/m³)	LOD (ug/sample)	RL (ug/sample)
Cadmium	<0.023	<0.0000043	0.023	0.075
Lead	<0.15	<0.000028	0.15	0.50

Sample ID: FOPR240311FB		Collected: 03/11/2024		
Lab ID: 2407242006		Received: 03/12/2024		
Sampling Location: Frisco Development				
Method: NIOSH 7300 Mod., MCE		Media: MCE Filter		
Dilution: 1		Instrument: ICP13		
Sampling Parameter: Air Volume 0 L		Prepared: 03/13/2024 (315672)		
		Analyzed: 03/14/2024 (315713)		
Analyte	Result (ug/sample)	Result (mg/m³)	LOD (ug/sample)	RL (ug/sample)
Cadmium	<0.023	NA	0.023	0.075
Lead	<0.15	NA	0.15	0.50

Report Authorization (/S/ is an electronic signature that complies with 21 CFR Part 11)

Method (Analysis Batch)	Analyst	Peer Review
NIOSH 7300 Mod., MCE (315713)	/S/ Ethan Hamilton 03/14/2024 13:36	/S/ Kristie F. Bitner 03/14/2024 14:29

Laboratory Contact Information

ALS Environmental
960 W Levoy Drive
Salt Lake City, Utah 84123

Phone: (801) 266-7700
Email: alslt.lab@ALSGlobal.com
Web: www.alsglobal.com/slt



ANALYTICAL REPORT

Workorder: **34-2407242**

Client Project ID: Frisco Development Corporation

Purchase Order: 22382

Project Manager: Jessica Cofrancesco

General Lab Comments

The results provided in this report relate only to the items tested.

Samples were received in acceptable condition unless otherwise noted.

The following was provided by the client: Sample ID, Collection Date, Sampling Location, Media Type, Sampling Parameter. Collection Date, Media Type, and Sampling Parameter can potentially affect the validity of the results.

Samples have not been blank corrected unless otherwise noted.

This test report shall not be reproduced, except in full, without written approval of ALS.

ALS provides professional analytical services for all samples submitted. ALS is not in a position to interpret the data and assumes no responsibility for the quality of the samples submitted.

All quality control samples processed with the samples in this report yielded acceptable results unless otherwise noted.

ALS is accredited for specific fields of testing (scopes) in the following testing sectors. The quality system implemented at ALS conforms to accreditation requirements and is applied to all analytical testing performed by ALS. The following table lists testing sector, accreditation body, accreditation number and website. Please contact these accrediting bodies or your ALS project manager for the current scope of accreditation that applies to your analytical testing.

Testing Sector	Accreditation Body (Standard)	Certificate Number	Website
Industrial Hygiene	AIHA (ISO 17025 & AIHA IHLAP)	101574	http://www.aihaaccreditedlabs.org
	DOECAP-AP	L24-29	http://www.pjllabs.com
	Washington	C596	https://ecology.wa.gov/Regulations-Permits/Permits-certifications/Laboratory-Accreditation

Definitions

LOD = Limit of Detection = MDL = Method Detection Limit, A statistical estimate of method/media/instrument sensitivity.

LOQ = Limit of Quantitation = RL = Reporting Limit, A verified value of method/media/instrument sensitivity.

ND = Not Detected, Testing result not detected above the LOD or LOQ.

NA = Not Applicable.

** No result could be reported, see sample comments for details.

< Means this testing result is less than the numerical value.

() This testing result is between the LOD and LOQ and has higher analytical uncertainty than values at or above the LOQ.