

**Asbestos Monitoring  
and Mitigation Plan  
at  
Specialty Granules LLC**

**Project No: LLH808740**

**Date: June 16, 2020**

**Prepared for:**

**Specialty Granules LLC  
13424 Pennsylvania Ave.  
Suite 303  
Hagerstown, MD 21742**

# Asbestos Monitoring and Mitigation Plan at Specialty Granules LLC

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## 1. Introduction

This Asbestos Monitoring and Mitigation Plan ("Plan") has been prepared on behalf of Specialty Granules LLC (SGI) to establish asbestos monitoring and mitigation protocols for SGI's non-metallic mineral quarry and processing plant at the existing site located near Blue Ridge Summit, PA (southwestern Adams County).

The primary business of the site is to mine a meta-basalt rock that is processed into roofing granules. SGI operates a permitted mine at this location and has applied for an additional permit to extend the life of the operation by expanding into the "Northern Tract" of the property. The Charmian property is bounded by Old Waynesboro Road (south), Iron Springs Road (east), Lower Gum Springs Road (north), Gum Springs Road (west) and Furnace Road (west).

## 2. Description of Facility

The Charmian Site is located in Hamiltonban Township, Adams County, PA (see Figure 1 below). Currently, the Charmian Site generally consists of an active quarry (Pitts Quarry – SMP 01930302), an inactive quarry (West Ridge Quarry – SMP 6477SM5), stockpile storage areas, rock crushers, manufacturing plants, and related erosion and sediment control/stormwater control features (e.g. sediment ponds and traps, collection ditches, and other best management practices features). SGI extracts meta-basalt and related lithologies at the Charmian Site to produce multiple rock products for SGI customers. The main product is manufactured roofing granules that are used to cover asphalt roofing shingles. The SGI site is 856± acres, including 620± acres which are authorized under the two above-referenced surface mine permits. The 112-acre Northern Tract permit area is contiguous to the active Pitts Quarry and will essentially serve as an extension of it.

## 3. Perimeter Air Monitoring

To monitor for potential airborne asbestos exposures at or beyond the Site property lines, SGI will conduct perimeter air monitoring in accordance with the protocols set forth in this Section 3.

### 3.1 Perimeter Air Sampling Locations and Wind Monitoring

There are a number of locations along the perimeter of the property at which samplers can be located. These locations will encompass both upwind and downwind locations without the need to relocate due to possible shifting winds.

The general locations of the samplers have been selected based on a number of factors including existing equipment operating locations, historic prevailing winds at the Quarry, site-specific activities connected with quarrying and processing of aggregate products, and locations of potential offsite receptors. Based on the historic Wind Rose plots from nearby NOAA stations at Hagerstown, Gettysburg, Greencastle, Waynesboro, and York (climate data can be obtained

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from: <https://www.ncei.noaa.gov>), the wind generally blows from the southwest along the ridgeline-direction. Based on this, the proposed sampling locations are shown in Figure 1. The selected locations may change over time based on changes in operational locations.

Unless otherwise approved by the Pennsylvania Department of Environmental Protection (PA DEP), wind direction and wind speed will be monitored and recorded continuously at the Site each operating day using an automated weather station permanently installed at the SGI facility. The recorded monitoring data should be maintained for one (1) year.

If at any time the automated weather station does not monitor either wind speed or wind direction for a period of greater than 12 hours, then monitoring of wind speed and/or wind direction shall be performed manually and recorded at least twice each operating day until the weather station has been repaired or replaced and has resumed monitoring the wind speed and wind direction.

If the automated weather station stops monitoring or recording the wind speed or wind direction as a result of a malfunction, within one business day of discovery of the malfunction, the permittee shall take steps to have the automated weather station repaired or replaced. The weather station shall resume operation within 1 month unless otherwise approved in writing by the Department.

If wind direction changes during a sampling event in any one sampling phase, the time and change in direction will be documented to reflect the change and provide data for review of analytical data. If it is determined that the wind direction has changed, creating a situation where the designated downwind samples are no longer downwind of the active operational areas, this fact will be noted on the sample data forms and the appropriate "new" downwind samples will be identified.

In all cases, based on professional judgment and knowledge of offsite concerns, sampling areas may be adjusted to provide more representative data and consideration of spatial conditions. All adjustment will be documented properly to show the change and the reason for the change.

### **3.2 Field Sample Collection Methodology**

The perimeter air samples will be collected at the selected locations as indicated in Section 3.1 above. Samples will be collected at selected locations using low flow air sampling pumps. The perimeter air sampling pumps used for the sample collection will be the Escort Elf air pumps by Zefon International (or equivalent)

Consistent with the analytical methods discussed in Section 3.4, each perimeter pump will be affixed with a cassette (and cowl) that contains a 25-millimeter (mm) diameter Mixed Cellulose Ester (MCE) filter with a pore size of 0.45 ( $\mu\text{m}$ ). The cassette and cowl shall be fully conductive to reduce fiber loss to the sides of the cassette due to electrostatic attraction. All samples will be collected at an elevation above ground that is typically referred to as the breathing zone. This is an area approximately 5-6 ft. above the ground surface. The sampling cassette and filter be affixed to a sampling post station or tripod that will be used to set the sampling height. At

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least two field blanks (or 10% of the total samples, whichever is greater) will be collected for each sampling event.

Each perimeter air sampling pump will be operated at approximately 1 to 4 liters per minute (lpm). Sampling times will vary, however; all sample durations will be established to assure an adequate sample volume to achieve a reporting limit of 0.005 f/cc or lower. Samples will be collected during the routine operations to provide a representative sample. Pump calibration is to be performed with a rotameter using the cassette on which the sample is collected.

The sample collector will record the pump serial number, sample number, initial flow rate, sample start/end times, sample locations, and final flow rate on the Field Data Sheets (see Attachment 1 – Field Sampling Documents). Sampling Field Data Sheets will be used to record sample collection information, field measurement and field observations obtained during each sampling event. Information in the datasheets will include, at a minimum, the following:

- Location of the sample, crushing and other site activities being conducted during sample collection;
- Date and time of collection;
- Sampling flow rate and volume;
- Description of temperature, wind direction, wind speed and general weather

conditions; and

- The unique sample identification number for each air sample.

Field notes will also be maintained during all sampling events. The notes will include general information, weather conditions, wind direction, etc. (see Attachment 1 – Field Sampling Documents for examples of both the Field Data Sheets and the Field Notes). Field notes will include a site map with approximate sample locations for each sampling event clearly marked on the map, and references to photographs as needed to document site sampling activities. Any non-routine site activities will also be noted in the field notes (e.g. lawn mowing, grading, etc.).

Data sheets and field notes will be completed, signed, and dated by the field technician.

### **Photographs of Air Sampling Activities**

Photographs will be taken during selected air sampling activities. The photographs will be used to provide backup documentation of sampling activities. A log of the photographs will be recorded and will include the sampling activity and approximate location for each photograph.

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**Chain of Custody Records**

Chain of custody procedures will be used to maintain and document sample collection and possession. During the sampling process, a laboratory Asbestos Chain-of-Custody form provided by the Laboratory will be completed (see Attachment 1 – Field Sampling Documents). The completed Chain-of-Custody Record will accompany all samples and be signed as required as each sample package recipient receives and relinquishes possession of the sample package.

**Sample Packaging and Shipment**

The air sample filter cassettes will be carefully packaged and delivered to the analytical laboratory using standard methodology. Plastic bags and other acceptable packaging containers will be used for sample shipment and convenience. Shipment tracking information will be provided for each sample shipment.

**Weather and Wind Direction Data**

During all field monitoring events, wind speed and wind direction will be monitored from the permanent weather station. The data will be collected as referenced in Section 3.1 and will be reviewed prior to and following each sampling event. The weather station data will be provided as part of the final report at the completion of the project.

**3.3 Sampling Frequency**

Although daily hours of operation may vary, the plant is expected to operate each week Monday through Friday and occasionally on a Saturday. Air sampling events will coincide with days the facility is operating and will not be conducted on closed days.

Samples will be collected twice per month for an initial period of 6 months. The actual day on which the samples are collected can vary to minimize the possibility of precipitation, which could affect the overall airborne particulates. After the initial six-month period, SGI may request permission from PA DEP to decrease the frequency of sampling or to cease asbestos air monitoring, provided that airborne asbestos fiber levels are consistently less than the target level of 0.01 f/cc as determined pursuant to Section 3.4. SGI shall keep a log of quarry activities that occur during each sampling event.

SGI or SGI's designated contractor will notify PA DEP at least two (2) working days prior to initiating each air sampling event conducted pursuant to this Plan so that PA DEP representatives have an opportunity to collect samples at the same locations during the same time period. SGI and SGI's designated contractor will facilitate PA DEP's sample collection efforts by providing access to sampling locations and sufficient time and space to sample. Once regular monitoring is underway, the Department will be notified of any unusual changes in the sampling via electronic mail. In addition, PA DEP will be notified as soon as possible if any sampling event has been cancelled along with the reason for the cancellation.

### **3.4 Analytical Methods**

The analytical methods and laboratory analysis for asbestos in air analysis to be utilized as part of this plan shall be those described in ISO 10312-2019-10 "Ambient Air – Determination of Asbestos Fibers – Direct Transfer Transmission Electron Microscopy Method", as modified by Page C-3 of EPA's "OSWER Directive #9200.0-68, September 2008, Framework For Investigating Asbestos-Contaminated Superfund Sites", which states that *"Under the ISO method, two specific counting schemes are detailed. The first scheme is more general and allows for the counting of fibers that are 0.5  $\mu\text{m}$  in length or greater, and have aspect ratios of 5:1 or greater. In routine practice, TEM is able to resolve fibers down to approximately 0.1  $\mu\text{m}$  in width, as compared to the resolution for routine PCM (0.25  $\mu\text{m}$ ). Therefore, short thin fibers that would not be detected using PCM will be detected using TEM under the general counting scheme. EPA recommends modification of the aspect ratio to 3:1 for this counting scheme."*

Although the above methods must be used for all air samples, SGI may at its discretion concurrently analyze air samples using alternative methods as follows, in order to compare the results of the methods. The allowable alternative methods which may be used for comparison shall include PCM in accordance with either the Occupational Safety & Health Administration (OSHA) Method ID-160 (see 29 C.F.R. 1910.1001, Appendix B) or the National Institute for Occupational Safety and Health (NIOSH) Manual for Analytical Methods (NMAM), Method 7400, Asbestos and other Fibers by PCM. These PCM methods are used to count all visible fibers, including non-asbestos fibers, that are longer than 5  $\mu\text{m}$  with a 3:1 aspect ratio or greater. This test may over predict the actual potential asbestos in the air; consequently, the PCM method will provide a worst-case indication of the number of fibers in the sample areas.

If PCM analysis detects potential asbestos fiber concentrations in excess of 0.01 fiber/cc, then NIOSH Method 7402, Asbestos by TEM, shall be employed to ascertain the mineralogy of the fibers in the sample. TEM analysis is used to identify and differentiate asbestos fibers from non-asbestos fibers.

If SGI chooses to do comparative analyses with PCM/TEM NIOSH 7402, and if SGI after a period of three years of such analyses, concludes that the results of these analyses do not significantly differ from the results of the required ISO 10312 sampling, SGI may petition DEP to discontinue the ISO 10312 analyses in favor of PCM/TEM NIOSH 7402 analyses.

If any TEM method of asbestos analysis confirms asbestos fiber concentrations in excess of 0.01 fiber/cc in any sample, then the reporting and corrective action requirements set forth in Section 3.6 are triggered.

If any air sampling filters are determined to be overloaded with particulate and cannot be read by ISO 10312, SGI shall report this to DEP within 7 days of the determination, and shall propose corrective action for either re-analyzing the filters with another method, or obtaining replacement samples capable of being read via ISO 10312, within 7 days of the report to DEP.

### **Analytical Laboratory**

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All samples will be analyzed by an analytical laboratory selected from the list of asbestos analytical laboratories that are part of the National Voluntary Laboratory Approval Program (NVLAP) and are accredited by the American Industrial Hygiene Association (AIHA) and by the Department of Environmental Protection – Bureau of Laboratories. Any accredited laboratory that meets the requirements listed above may be used for sample analysis.

### **Quality Control**

A quality control (QC) program will be implemented to assure data quality. The field program includes the use of blanks and duplicate samples. Should any sample fail at a particular location, that sample at that location will be resampled within two weeks.

### **Field Blanks**

At least 2 field blanks (or 10% of the total number of samples collected, whichever is greater) will be submitted with each set of samples. For the SGI site, this will be 2 field blanks. A field blank is a new sampling cassette that is opened on site during the sampling period, kept uncovered for at least 30 seconds, and then is closed and sealed for transport to the laboratory. The purpose of the field blank is to document the possible contamination of the filter media that could occur as a result of handling the samples in the field.

### **Duplicate Samples**

Duplicate samples may be collected to evaluate the reproducibility of sampling and analysis. Duplicate samples will be collected, stored and transported in the same manner as the actual samples. A separate number will be assigned to each duplicate, and all duplicates will be submitted blind to the laboratory. For this monitoring program, duplicate sampling will be conducted through the collection of co-located samples collected during the same sampling interval.

### **Field Equipment**

The following equipment will be utilized for this sampling:

- Air sampling pumps (personal or low volume pumps).
- Asbestos sample filter cassettes with filters (25 mm, 0.45 µm pore, MCE).
- Air pump calibration equipment.
- Quart and gallon size resealable bags.
- Sample transport containers and packing material.
- Additional supplies as needed including health and safety equipment.

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- SGI Permanent Weather Station.

### **3.5 Recordkeeping and Reporting**

All records and documents related to the airborne asbestos monitoring program will be maintained by SGI for at least five (5) years and will be made readily available to PA DEP upon request. Field Data Sheets and Field Notes will be completed, signed, and dated by the recorder. All logs will be written with waterproof ink. Corrections to data entered will be made by crossing out the error with a single horizontal line, initialing and dating the correction, and entering the correct information. Crossed-out information shall be readable. Photographs will be taken during selected air sampling activities. The photographs will be used to provide documentation of sample locations, site activities, etc. that are pertinent to the asbestos monitoring task. A log of the photographs will be recorded and will include the sampling activity and approximate location for each photograph.

All laboratory reports and associated data sheets, as well as progress reports and other documentation related to perimeter air sampling, will be properly maintained for five (5) years. Copies of the reports will be submitted to DEP quarterly, ninety (90) days after the end of each quarter. All samples analyzed will be retained by the laboratory for at least one (1) year from the date of analysis to allow for follow-up testing should the need arise.

Perimeter air monitoring reports will include a summary of the analytical results for all samples collected and analyzed during the reporting period; copies of applicable chain of custody sheets and applicable field sampling logs; and a written report detailing any investigative actions or corrective measures that may have been taken during the reporting period in response to a result exceeding 0.01 fibers/cc.

### **3.6 Corrective Actions**

If TEM analysis confirms asbestos fiber concentrations in excess of 0.01 fiber/cc in any sample, SGI will undertake the following corrective measures to abate any potential harmful migration of asbestos fibers:

1. Report the results immediately to the SGI site manager and Senior Director of Operations. SGI will also notify the PA DEP within 24 hours of receipt of the TEM analysis results.
2. Daily air sampling of that location will commence for 7 days.
3. Investigate the potential cause of the results. The investigation will include at least the following elements:
  - a. Review of operational activities that were occurring during sampling,
  - b. Confirmation that dust suppression systems are fully operational, and

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c. Quality Assurance and Quality Control review of all sampling and laboratory equipment and procedures.

4. SGI will take immediate corrective measures. These corrective measures may vary based on the location of the sample, and findings of the investigation. The investigation will begin as soon as the result is confirmed and will be completed in an expedited manner. The corrective actions may include investigation of the source of any airborne asbestos, extra dust suppression measures, cleanup, repairs or modifications to systems and controls, or temporary cessation of operations.

5. Within seven calendar days of receipt of the TEM analysis results from the 7-day daily air sampling in 2) above, submit to PA DEP a written report of the sampling results, and a plan and schedule of steps that have been or will be taken to identify and mitigate the source of the airborne asbestos, and to re-monitor ambient air at the facility perimeter. This written report should also include the results of the most recent EPA Method 100.1 water sampling described in Section 5.

6. SGI will record the results and all corrective measures taken at the site in a permanent written log.

### **4. Activity-Based Air Monitoring**

On a quarterly basis, unless otherwise approved in writing by PA DEP, SGI will collect and analyze air samples at each of the following operations using the same collection and analysis methods described above in Sections 3.2 and 3.4:

- Immediately downwind vicinity of blasting, if blasting is conducted during the quarter.
- Near drilling machinery during operations, if drilling is conducted during the quarter.
- Next to trucks traveling on quarry roads.
- Near crushing/processing machinery during operations.

If TEM analysis confirms asbestos fiber concentrations in excess of 0.01 fiber/cc in any sample, SGI will (1) notify PA DEP within 24 hours of receipt of the TEM analysis results, and (2) within three calendar days, conduct perimeter air monitoring in accordance with Section 3 above.

SGI will maintain records associated with quarterly activity-based monitoring in accordance with Section 3.5.

## **5. Dust Suppression Water Source Monitoring**

On an annual basis, unless otherwise approved in writing by PA DEP, SGI will collect water samples from dust suppression water sources (i.e., from the upper and lower “J-Stand”) for asbestos analysis. These samples will be collected and analyzed in accordance with EPA Method 100.1, Analytical Method for Determination of Asbestos Fibers in Water. SGI will maintain records of annual EPA Method 100.1 water analyses for at least five (5) years, and will make these records available to PA DEP upon request. Furthermore, if perimeter air sampling triggers corrective action requirements in accordance with Section 3.6, then SGI will submit the results of the most recent EPA method 100.1 sampling to PADEP in accordance with Section 3.6.

## **6. Asbestos Avoidance Measures**

### **6.1 Mineral Identification and Management**

SGI has established and implemented a Mineral Identification and Management Guide. This guide defines the company’s procedures to properly identify and manage any materials that meet the guide’s definition of “Suspect Material.” The Guide covers a number of topics, including the following:

- Identification and mapping of suspect zones and structures of interest.
- Geologic field inspections by a trained geologist.
- Shot rock (muck) pile inspections for suspect minerals. These are completed upon the initial blast and 1/week until the pile is depleted.
- Training requirements for key site personnel.
- Proper management and disposal of suspect materials if identified.
- Health and Safety precautions for personnel involved in managing suspect materials.
- Recordkeeping requirements.

In addition to implementation of the Suspect Material protocols set forth in the Guide, SGI will also conduct asbestos sampling and analysis of non-suspect material in accordance with the following procedures:

- SGI will collect a minimum of one composite sample per month of material deemed non-suspect under the Guide.
- Samples will be prepared using disc pulverization in a manner that does not excessively pulverize the sample.

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- Samples will be analyzed by Polarized Light Microscopy (PLM) using the California Air Resources Board (CARB) Method 435, Determination of Asbestos Content of Serpentine Aggregate. All visible elongate mineral particles (EMPs) (those identified as asbestos fibers and cleavage fragments) with aspect ratios greater than 3:1 must be counted.
- If PLM analysis does not detect asbestos fibers in the sample, the sample will be analyzed by TEM to verify results using EPA Method 600/R-93/116, Method for the Determination of Asbestos in Bulk Building Materials. All visible EMPs (those identified as asbestos fibers and cleavage fragments) with lengths greater than 0.5  $\mu\text{m}$  and aspect ratios greater than 3:1 must be counted.
- SGI will report the results of these analyses to PA DEP on a quarterly basis.

### **6.2 Fugitive Emissions Mitigation Plan**

SGI implements a number of practices that are consistent with the industry standards and regulatory requirements in order to control fugitive emissions at the Charmian site. Below are the largest potential sources of dust emissions at the site, as well as the practices utilized at Charmian to control them. SGI will utilize these practices as described below, and also as necessary in order to maintain compliance with 25 Pa. Code §123.2 and §123.1(c):

#### **Vehicle Traffic:**

- SGI utilizes a street sweeper to clean roads near site entrances as needed. SGI's street sweeper is a state-of-the-art sweeper utilizing a broom system and water sprays to collect debris while minimizing dust generation. This sweeper is used on internal paved roads at Gate 1 and Gate 2, as well as the portion of Old Waynesboro Rd.
- When operating, SGI will conduct a daily visual inspection for material tracked onto public roads. If material has accumulated on a public road, SGI will clean the road promptly or, at minimum, by the end of the workday.
- SGI has installed a truck wash utilizing spray nozzles and pressurized water to remove loose or dusty material from loaded trucks leaving the site through Gate 2.
- All trucks transporting materials off-site will be covered with tarps or other devices.
- Loads will be adequately wetted or otherwise controlled before and during truck loading operations.
- Both site entrances are paved to reduce tracking and improve sweeping efficiency.
- SGI operates and maintains 3 large trucks equipped with water sprays to control dust from roadways.

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- Water trucks are equipped with water cannons to spray hard to reach areas of stockpiles during times of need.
- Limit vehicle speeds on haul roads in quarry and stockpile areas to 30 miles per hour; limit vehicle speeds in other areas of the site to 20 miles per hour.

### Haul Roads:

- Application of dust suppressing chemicals during extremely dry or windy conditions and in winter freezing months as needed.
- SGI operates and maintains 3 large trucks equipped with water sprays to control dust from roadways.
- Roads are resurfaced/regraded as needed to maintain a clear and safe working surface and thereby reducing dust generation.

### Plant Stationary Equipment and Stockpiles:

- Air Pollution Control Equipment is installed and operated according to PA DEP performance standards coupled with work practices, inspection, and source monitoring.
- Surge piles are equipped with water sprays to control emissions. Stock and working piles will be adequately wetted or controlled using dust palliatives or suppressants, wind berms, or breaks during the addition and removal of material.
- SGI occasionally applies surface binders to stockpiles of fines in order to control particulate emissions from areas that will be temporarily inactive and may be subject to dust generation.
- Conveyors and transfer points are generally covered and dust is controlled with wet sprays and/or dust collection systems to prevent fugitive emissions.
- SGI will ensure that material being excavated, crushed, screened, loaded, transferred or conveyed does not result in visible dust emissions exceeding 40 CFR Part 60, Subpart OOO limits for applicable sources.

### Drill Rigs:

- On-board dust collection and/or water sprays on drill rigs will be used to limit dust generation in the Northern Tract.
- A drill shroud is utilized at the ground level to control fugitive emissions from drilling activities in the Northern Tract.

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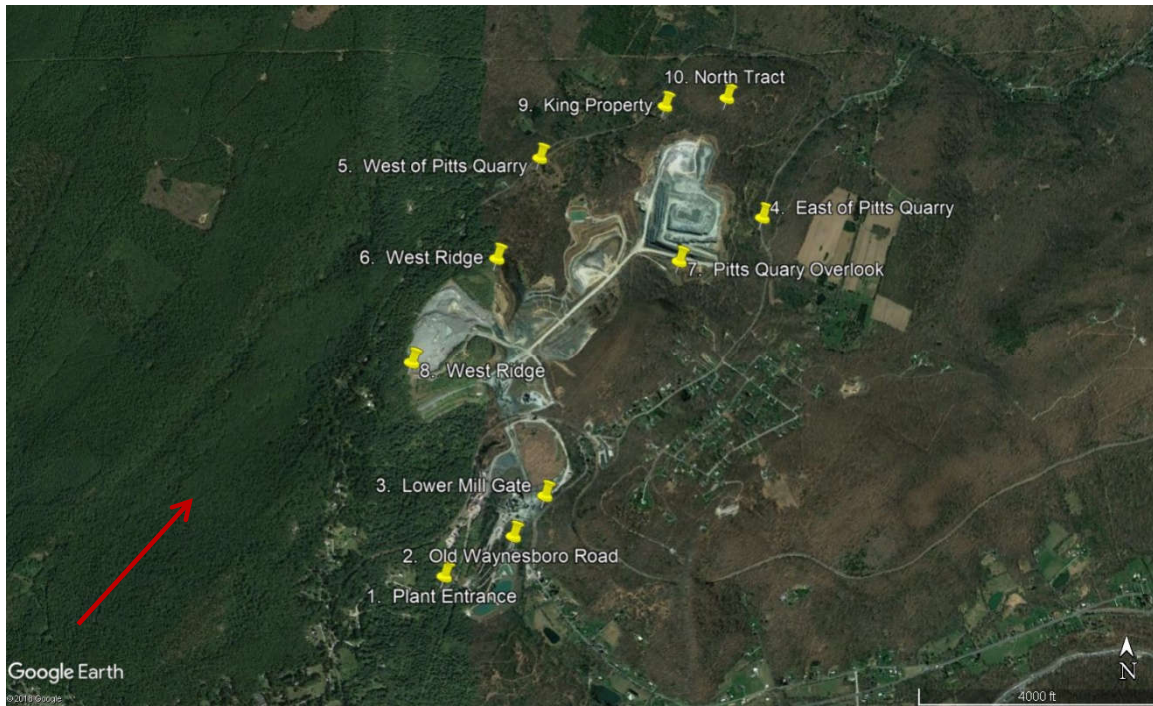
Training and Inspections for Visual Emissions:

- Key plant personnel are trained to conduct visual observations for fugitive emissions as well as opacity readings on emissions sources to ensure they are operating properly.
- SGI conducts preventative maintenance of operational and dust collection equipment to ensure the timely replacement of worn components.

# **Exhibit 1**

## **Area Map**

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**Figure 1. Proposed locations of up to 10 samplers along the general perimeter of the Specialty Granules property at Charmian, PA. The red arrow indicates the direction in which the wind typically flows.**

# **Attachment 1**

## **Field Sampling Documents**





# AIR SAMPLE DATA SHEET

Date _____		Technician _____			Page _____ of _____		
Project # _____		Calibration # _____					
Barametric Pressure _____	Temperature _____ Humidity _____ Altitude _____	Start Time (Clock)	Stop Time (Clock)	Elapsed Time HR-MIN	Time Sampled Minutes	Flow Rate L/MIN (Start/Stop)	Volume Sampled Liters
Assigned Sample #	Pump No.					/	
Location	Height	Observations/Comments				/	
Filter <input type="checkbox"/> PC <input type="checkbox"/> MCE	Sample <input type="checkbox"/> Indoor <input type="checkbox"/> Outdoor <input type="checkbox"/> Personal SS#					Total Volume	
Assigned Sample #	Pump No.					/	
Location	Height	Observations/Comments				/	
Filter <input type="checkbox"/> PC <input type="checkbox"/> MCE	Sample <input type="checkbox"/> Indoor <input type="checkbox"/> Outdoor <input type="checkbox"/> Personal SS#					Total Volume	
Assigned Sample #	Pump No.					/	
Location	Height	Observations/Comments				/	
Filter <input type="checkbox"/> PC <input type="checkbox"/> MCE	Sample <input type="checkbox"/> Indoor <input type="checkbox"/> Outdoor <input type="checkbox"/> Personal SS#					Total Volume	
Assigned Sample #	Pump No.					/	
Location	Height	Observations/Comments				/	
Filter <input type="checkbox"/> PC <input type="checkbox"/> MCE	Sample <input type="checkbox"/> Indoor <input type="checkbox"/> Outdoor <input type="checkbox"/> Personal SS#					Total Volume	

