



September 11, 2018

Mr. Terry McKee
Knoxville's Community Development Corporation
Purchasing Division
901 North Broadway
Knoxville, TN 37917

Re: Lead-Based Paint Inspection Report
Western Heights Apartments, 1621 Jourolman Avenue, Knoxville, TN 37921
QE2 Project No. 501367.000.000

Dear Mr. McKee:

Enclosed please find the Lead-Based Paint Inspection Report for the Western Heights Apartments, located at 1621 Jourolman Avenue in Knoxville, Tennessee. The report was prepared in accordance with Chapter 7 of the 2012 U.S. Department of Housing and Urban Development (HUD) ***Guidelines for the Evaluation and Control of Lead-Based Paint Hazards in Housing, Second Edition, July 2012***, U.S. Environmental Protection Agency (EPA) 40 CFR part 745, and Title X of the 1992 Housing and Community Development Act. If you have any comments, questions, or need additional copies, please feel free to contact Terry Davis or me at 689-1395.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Jessica Lindbom', with a large flourish extending to the right.

Jessica Lindbom
Tennessee Certified Lead-Based Paint Inspector
License No. TNLBP2010-2277-6402I

c: QE2 File 501367.000.000

LEAD-BASED PAINT INSPECTION REPORT

**WESTERN HEIGHTS APARTMENTS
1621 JOUROLMAN AVENUE
KNOXVILLE, TENNESSEE**

LEAD-BASED PAINT INSPECTION REPORT

for:

**Western Heights Apartments
1621 Jourolman Avenue
Knoxville, Tennessee 37921**

Prepared for:

**Mr. Terry McKee
Knoxville's Community Development Corporation
901 North Broadway
Knoxville, TN 37917**

Prepared by:



**Quantum Environmental & Engineering Services, LLC
126 Dante Road
Knoxville, TN 37918
QE2 Project No. 501367.000.000**

September 11, 2018

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ACRONYMS

AL	Action Limit
CFR	Code of Federal Regulations
DOT	United States Department of Transportation
DSHWM	State of Tennessee Division of Solid and Hazardous Waste Management
EPA	United States Environmental Protection Agency
HSWA	Hazardous and Solid Waste Amendments
HUD	United States Department of Housing and Urban Development
LBP	Lead-Based Paint
OSHA	Occupational Safety and Health Administration
PEL	Permissible Exposure Limit
ppm	parts per million
QE2	Quantum Environmental & Engineering Services, LLC
RCRA	Resource Conservation and Recovery Act
TCLP	Toxicity Characteristic Leaching Procedure
TDEC	Tennessee Department of Environment and Conservation
TDOT	Tennessee Department of Transportation
TOSHA	Tennessee Occupational Safety and Health Administration
TWA	Time Weighted Average
XRF	X-ray Fluorescence

EXECUTIVE SUMMARY

Quantum Environmental & Engineering Services, LLC (QE2) conducted a lead-based paint (LBP) inspection of the interiors, exteriors, and common areas of the dwelling units; the Main Office; the Mail Drop building; and the Boys and Girls Club building of the Western Heights Apartments located at 1621 Jourolman Avenue in Knoxville, Tennessee. The fieldwork was performed between July 10 and July 31, 2018. The inspection was performed and the report was prepared in accordance with Chapter 7 of the 2012 U.S. Department of Housing and Urban Development (HUD) *Guidelines for the Evaluation and Control of Lead-Based Paint Hazards in Housing, Office of Healthy Homes and Lead Hazard Control, Second Edition, July 2012 revision*, U.S. Environmental Protection Agency (EPA) 40 CFR part 745, and Title X of the 1992 Housing and Community Development Act. The work was performed under contract to Knoxville's Community Development Corporation (KCDC), which manages the site.

The principal objective of the investigation was to determine whether LBP is present in dwelling units, common areas, or exterior areas at the Western Heights Apartments complex, and if present, which building components contain LBP. The site includes two distinct phases of construction. A total of 244 existing units were constructed in the 1930's, and 191 existing units were constructed in the late 1950's. The number of units tested for each phase of construction was based on HUD guidelines. A total 52 of the older units and 50 of the newer units were tested. The complex owners, managers, maintenance staff, and renovation and repair contractors may use the information reported in this report to ensure the environmentally compliant handling and/or disposal of all lead-containing materials, in accordance with all local, state, and federal regulations.

QE2 conducted a surface by surface assessment of building components in the field using a portable x-ray fluorescence (XRF) instrument. Approximately 4,674 locations were tested at the 1939 apartments (designated by KCDC as the "301" units). Of those, 1,025 of the test locations indicated lead concentrations greater than or equal to the Tennessee Department of Environment and Conservation (TDEC)/Environmental Protection Agency (EPA)/HUD standard for classification as LBP (≥ 1.0 mg/cm² by XRF). Of the 3,819 test locations sampled at the 1959 apartments, (designated by KCDC as the "304" units), 205 test locations indicated values exceeding TDEC/EPA/HUD standard of ≥ 1.0 mg/cm² by XRF. Within and around the Main Office, 201 locations were tested and 38 locations indicated values ≥ 1.0 mg/cm² by XRF. At the Boys and Girls Club building, 152 locations were tested and 21 locations indicated values ≥ 1.0 mg/cm² by XRF. None of the 32 locations tested at the Mail Drop building indicated values ≥ 1.0 mg/cm² by XRF.

Some painted surfaces within all the assessed buildings contained levels of lead below 1.0 mg/cm². While not considered LBP, these coatings could create lead dust or lead-contaminated soil hazards if the paint is turned into dust by abrasion, scraping, or sanding. Occupational Safety and Health Administration (OSHA) standards apply to protect worker health if lead is present at any concentration. If the coating/paint on the building components is not LBP (<5,000 ppm or <1.0 mg/cm² by XRF), any unwanted building materials can be disposed in a construction and demolition (Class IV) landfill no matter the condition. During any planned renovations, the OSHA standard would apply when paint is removed by heating, sanding, scraping, abrasive blasting, or peeling. The OSHA standard is based on a time-weighted average of exposure to lead.

Under the EPA's Renovation, Repair, and Painting (RRP) Rule, contractors performing renovation, repair and painting projects that disturb LBP in homes, multi-family complexes, child care facilities, and schools built before 1978 must be certified and must follow specific work practices to prevent lead contamination and occupant exposure, including containing lead dust and debris, and testing potential waste.

The results of this inspection indicate that lead concentrations greater than or equal to 1.0 mg/cm² were found in coatings on building components described more fully in the report, using the inspection protocol in Chapter 7 of the ***HUD Guidelines for the Evaluation and Control of Lead-Based Hazards in Housing (Second Revision, July 2012)***. This report should be kept by the inspector and should also be kept by the owner and all future owners for the life of the dwelling.

Since the site buildings are over 50 years old, they may be eligible for listing on the National Register of Historic Places, a state register, or other local inventory. In historic properties, interim controls are generally preferred over abatement strategies because they preserve the integrity of the structure. However, if the property receives federal housing assistance, the amount and type of housing assistance may contribute to a determination of the approach(es) taken to control lead hazards. The Lead Safe Housing Rule applies if the property receives federal housing or rehabilitation assistance. (24 CFR Part 35, Subparts B–R).

1.0 INTRODUCTION

QE2 conducted a LBP inspection on the dwelling units, common areas, and exteriors at the Western Heights Apartments located at 1621 Jourolman Avenue in Knoxville, Tennessee. The inspection also included the Main Office, the Mail Drop building, and the Boys and Girls Club located on the site complex. The fieldwork was performed between July 10 and July 31, 2018, according to the purchase order PO138046-49420 as authorized by Mr. Terry McKee with Knoxville's Community Development Corporation (KCDC). The inspection was performed and the report was prepared in accordance with Chapter 7 of the 2012 U.S. Department of Housing and Urban Development (HUD) *Guidelines for the Evaluation and Control of Lead-Based Paint Hazards in Housing, Second Edition, July 2012*, U.S. Environmental Protection Agency (EPA) 40 CFR part 745, and Title X of the 1992 Housing and Community Development Act. The inspection was conducted by Ms. Jessica Lindbom of QE2. Ms. Lindbom is a Tennessee Certified LBP Inspector (license number TNLBP2010-2277-6402I) and QE2 is a Tennessee Certified Firm (license number FTN-2004-1839) with the Tennessee Department of Environment and Conservation (TDEC), Division of Solid and Hazardous Waste Management (DSHWM).

1.1 Objectives and Scope

The principal objective of the investigation was to determine whether LBP is present in dwelling units, common areas, or exterior areas at the Western Heights Apartments, at the Main Office, the Mail Drop building, and the Boys and Girls Club, and, if present, which building components contain LBP. The complex owners, tenants, maintenance staff, and renovation and repair contractors may use the information reported in this Lead-Based Paint Inspection Report to ensure the environmentally compliant handling and/or disposal of all LBP materials, in accordance with all local, state, and federal regulations.

The scope of work for this project included conducting a surface by surface assessment of building components in the field using a portable x-ray fluorescence (XRF) instrument, and the preparation of this Lead-Based Paint Inspection Report.

1.2 Building Descriptions

The site includes two distinct phases of construction. A total of 244 existing units were constructed in 1939 (designated by KCDC as the "301" units), and 191 existing units were constructed in the late 1950's (designated by KCDC as the "304" units). The Main Office, the Boys and Girls Club building, and the Mail Drop building appear to have been constructed during the initial 1939 development.

The Western Heights Apartments are located in a residential area of Knoxville within the boundaries of Vermont and Virginia Avenues to the north, McSpadden Street to the east, and Jourolman Avenue and W. Scott Street to the south. The apartment complex is located on approximately 58.75 acres and is on rolling hills. The site has been utilized as a multi-family low income housing project since construction of the original 1939 portion of the site, which was expanded in the 1950's to include the area to the north and east. The complex contains approximately 435 apartment units and is improved with paved access roads and parking areas, an office, mail distribution structure, and a Boys and Girls Club building.

The 1939 apartment buildings are one and two-story concrete and brick buildings with sloping asphalt-shingle roofs. Each main entry has a concrete landing with vinyl siding over painted wood overhangs supported by painted metal posts. The interior walls are constructed of terra cotta tiles, concrete, and plaster with concrete and plaster ceilings. The doorways, windows and walls are trimmed in painted wood or concrete and the floors are finished with vinyl floor tile. Some bathrooms have painted concrete, drywall, or fiberboard covered soffits. The kitchens have composite wood cabinetry mounted under painted drywall soffits. The Mail Drop building is a former one-story apartment unit that has been converted to the U.S. Postal Service mail drop on the west side and a storage area on the east side. Only the storage area and exterior were accessible during the site assessment.

The Main Office building, constructed in 1939, and is a two-story, concrete slab on grade structure with painted block and brick walls, painted concrete beams, and vinyl siding on the soffit and roof apex. The roof is sloping and covered with asphalt shingles. The interior walls are constructed of terra cotta tiles, concrete, and plaster with concrete and plaster ceilings. The doorways, windows and walls are trimmed in painted wood or concrete and the floors are finished with vinyl floor tile, carpet, bare concrete, and linoleum.

The 1950's apartment buildings are one and two-story brick, block, and painted concrete buildings with sloping asphalt-shingle roofs and painted wood soffits. All of the apartment entry overhangs and support columns were replaced after 2011. The interior walls are painted gypsum wallboard, drywall, and plaster. The doorways are trimmed in painted wood and the floors are finished with vinyl floor tile and linoleum. The kitchens have composite wood cabinetry.

The Boys and Girls Club building, located 1417 W. Oldham Avenue, is a one-story block and brick structure with painted metal support framing in the gym area. The flat roof appears to have a rubber membrane, with painted metal roof drains. The interior walls are painted concrete, gypsum wallboard, or drywall. The doorways are trimmed in painted metal or wood and the

floors are finished with varnished wood, vinyl floor tile, and linoleum. The kitchen is finished with composite wood cabinetry.

2.0 LEAD-BASED PAINT SURVEY

Based on the date of original construction (1939 for the 301 section and late 1959 for the 304 section), LBP was potentially present on surfaces. The following subsections present background information on Federal and State regulations for lead-based and lead-containing paint, particularly with regard to maintenance and renovation; a review of the methodology used for surface coating analysis; and results of the LBP assessment. XRF Field Data Collection Forms are provided in Appendix A.

2.1 Regulatory Framework

Most of the regulations associated with LBP inspections and hazards are related to LBP in “target housing” and “child-occupied facilities” and are administered by the EPA, HUD, and the TDEC DSHWM under the State’s Lead-Based Paint Abatement Program. The TDEC/EPA/HUD standard for LBP indicates a positive result as any value $\geq 5,000$ ppm, ≥ 1.0 mg/cm² by XRF, or 0.5% by weight. Lead-free paint is defined as containing < 600 ppm, < 0.01 mg/cm² by XRF, or 0.06% by weight.

The handling and disposal of materials containing LBP (e.g., LBP debris, paint chips, demolition debris, etc.) in Tennessee is regulated by the TDEC DSHWM. The state regulations mimic federal regulations under the Resource Conservation and Recovery Act (RCRA) and the Hazardous and Solid Waste Amendments (HSWA) to RCRA. In the absence of more strict state or local regulations regarding LBP, federal regulations apply to LBP disposal activities.

The DSHWM policy is generally consistent with federal policy and regulations for LBP disposal. The presumption is that LBP means that which contains lead at concentrations $\geq 5,000$ ppm, ≥ 1.0 mg/cm² by XRF, or 0.5% by weight. If the coating/paint on the building components is not LBP ($< 5,000$ ppm or < 1.0 mg/cm² by XRF), any unwanted materials can be disposed in a construction and demolition (Class IV) landfill no matter the condition. Current State regulations/policy indicate that if LBP is adhered to demolition debris surfaces and not loose or peeling, the debris can be disposed in a Class I, II, III, or IV disposal facility, and LBP removal or testing is not required to determine hazardous leaching potential before disposal. All loose and peeling LBP should be removed and collected before demolition activities and evaluated for hazardous leaching potential prior to disposal. Under current State and Federal regulations, analysis by Toxicity Characteristic Leaching Procedure (TCLP) is required to assess whether or not specific LBP materials (LBP dust and chips) are hazardous and whether those materials

require handling and disposal as hazardous or special waste. Once loose and peeling paint is removed from demolition debris, the remaining material can be disposed in a Class I, II, III, or IV disposal facility.

The determination for hazardous lead concentrations noted in the DSHWM policy involves the laboratory analysis of a representative sample of any LBP waste stream (for example, a composite sample representative of all materials to be disposed) for leachable lead according to the TCLP. The regulatory level for lead by TCLP analysis is 5.0 milligrams per liter (mg/L) or ppm, which is applied to the lead concentration in the liquid extracted during the TCLP process on the LBP waste and analyzed by the laboratory. TCLP results from LBP debris that are >5.0 mg/L or >5.0 ppm indicate that the waste is hazardous by toxicity, and that such debris must be disposed of as hazardous waste in accordance with State and Federal regulations.

Other LBP-related rules and regulations designed to protect workers and the environment are relevant to all demolition and/or renovation, and many maintenance activities. State and Federal regulations under the Occupational Safety and Health Administration (OSHA) and the Tennessee OSHA (TOSHA) regulate occupational exposure to lead during construction. Construction is defined as work for construction, alteration, and/or repair, including painting and decorating. All of these activities are potentially applicable at the Western Heights Apartment complex. In terms of worker protection, OSHA does not recognize the LBP or lead dust standards used by TDEC/HUD/EPA for target housing and child-occupied facilities (where LBP is $\geq 5,000$ ppm, ≥ 1.0 mg/cm² by XRF, or 0.5% by weight). OSHA considers lead detected **at any concentration** to be potentially hazardous to workers unless it can be demonstrated that those concentrations do not pose a hazard during work practices. In order to protect workers, OSHA established an action limit (AL) of 30 micrograms per cubic meter ($\mu\text{g}/\text{m}^3$) [8-hour, time-weighted average], and a permissible exposure limit (PEL) of 50 $\mu\text{g}/\text{m}^3$ [8-hour, time-weighted average] for worker exposure to lead aerosols. The PEL sets the maximum worker exposure to lead. The AL is the level at which an employer must begin certain compliance activities outlined in the standard. These standards are applicable if manual demolition of structures (e.g., walls), manual scraping, manual sanding, abrasive blasting, or use of a heat gun occurs where lead-containing coatings or paints are impacted.

Under the EPA Renovation, Repair, and Painting (RRP) Rule, beginning April 22, 2010, contractors performing renovation, repair and painting projects that disturb LBP in homes, multi-family complexes, child care facilities, and schools built before 1978 must be certified and must follow specific work practices to prevent lead contamination. The rule does not apply to

minor maintenance or repair activities where less than 6 square feet of LBP is disturbed in a room or where less than 20 square feet of LBP lead-based paint is disturbed on the exterior. Window replacement is not considered minor maintenance or repair. Jobs, other than emergency renovations, performed in the same room within the same 30 days must be considered the same job for the purpose of determining whether the job is a minor repair and maintenance activity.

Use of firms and individuals certified with the State LBP Abatement Program for renovation work may help to ensure that all appropriate State and Federal regulations associated with LBP, including the OSHA/TOSHA requirements, are met during renovation and disposal. Regardless of whether firms and individuals are certified with the State LBP Abatement Program, the employer is still responsible for compliance with the OSHA/TOSHA provisions unless the employer can make an initial determination that employees are not exposed to lead at or above the AL. This requirement means providing respiratory protection, protective work clothing and equipment, change areas, hand washing facilities, biological monitoring, and training. The OSHA standard also includes unspecified tasks where the employer has any reason to believe that an employee performing the task may be exposed to lead in excess of the PEL (1926.62(d)(2)(ii)).

2.2 Lead-Based Paint Survey Methodology and Sampling Protocol

The inspection included a comprehensive surface-by-surface determination of LBP employing detailed inspection protocols described in the HUD Guidelines (2012, Second Edition) for target housing and child-occupied facilities. A complete list of dwelling units, common areas, and exterior areas was obtained from site representatives. Due to the large number of units at the Western Heights complex, a representative sample of units from each of the two construction phases was chosen randomly for assessment. The site includes two distinct phases of construction. A total of 244 existing units were constructed in 1939, and 191 existing units were constructed in the late 1950's. The number of inspected units was determined to be 52 in the older 1939 structures and 50 in the newer 1950's structures. A complete list of dwelling units was obtained from site representatives and a program to generate random numbers was utilized to determine testing locations. Selected vacant apartments were tested first then the remaining randomly selected units were notified for access and sampled. The number of units to be sampled was chosen by reviewing Table 7.3 of the ***2012 HUD Guidelines for the Evaluation and Control of Lead-Based Paint Hazards in Housing, Second Edition***. Additionally, common areas including the Main Office, the Mail Drop building, and the Boys and Girls Club building were inspected. A physical assessment for LBP was performed by collecting XRF measurements at 8,878 measurement locations from common coated surfaces.

For each unit or area to be inspected, all testing combinations were identified in each room equivalent. A testing combination was characterized by the room equivalent, the component type, and the substrate. A room equivalent is an identifiable part of an area (e.g., living room, bedroom, exterior, foyer, etc.). Surfaces tested included any surface coated with paint, shellac, varnish, stain, wallpaper, etc. A minimum of one individual reading was collected from each testing combination in each room equivalent. The inspection also included identifying building components; determining substrate, finish, color, and condition; and describing deterioration. Field Data Collection Forms for the LBP survey are provided in Appendix C. Walls were identified by designating the wall with the interior entrance doorway from the previous room as Wall A and proceeding clockwise. If the primary exterior entrance was present in the room, Wall A was always assigned to a wall with that entrance.

A Thermo-Scientific XLp 300 (Serial Number 7512, SE-1806237375)) XRF instrument was utilized during the survey. This specific instrument uses a Cadmium-109 radiation source dated May, 2018. Radiation safety procedures were followed as required by applicable federal, State, and local regulations. An XRF instrument detects the lead content of paint by exposing the painted building component to x-rays, or gamma radiation, which causes lead to emit x-rays with a characteristic frequency or energy. The instrument then measures the intensity of this radiation. The calibration of the XRF instrument was verified before beginning the inspection each day, at regular intervals (at least every four hours) during the survey, and at the completion of the workday. Calibration measurements were made using known standard paint strips provided with the instrument by the manufacturer. Field calibration records are provided within the original XRF Field Data Collection Forms in Appendix C.

2.3 Lead-Based Paint Sample Results

A total of 52 of the older units and 50 of the newer units were tested along with the Main Office, the Mail Drop building, and the Boys and Girls Club building. Some available historic data was incorporated into the report and tables included in Appendix A, in addition to the minimum units tested. A surface assessment of the potentially impacted building components was performed in the field using a portable XRF instrument and are detailed in the following paragraphs.

1939-301 Apartments

Approximately 4,674 locations were tested at the 1939-301 apartments, and 1,025 indicated values greater than or equal to the TDEC/EPA/HUD standard for classification as LBP (≥ 1.0 mg/cm² by XRF).

Based on the test results, all of the exterior porch components (the painted metal posts, the vinyl-clad headers with painted wood underneath, and vinyl-covered porch roofs) tested positive for LBP. Several metal posts were in "fair" or "poor" condition with cracking, flaking, or alligating deterioration noted. Additionally, the exterior wood door jambs tested positive at all but two locations. Only one painted concrete threshold (unit 155) of the 52 units tested positive for LBP.

In the kitchens, all but one window in the 52 units tested positive for LBP. The LBP-coated components include the window frames, sills, and aprons of the windows. Additionally, the wood framing (not including the jamb) around the kitchen entry from the living room in 80% of the tested units was positive for LBP. The wood framing around the pantry areas (frame and jamb) and if present, rear entrance door frames, was also positive in 85% of the tested units. Kitchen wall headers were assessed and only 4 of the 52 tested positive for LBP. Kitchen ceiling data indicates that 10 out of 52 (or 19%) were positive for LBP. Only one kitchen wall out of all the units, tested positive for LBP.

In the units with stairwells, LBP was present on the first and second floor 1/2-wall metal caps and ends that are adjacent to the stairwells, and the stairwell risers, stringers, and handrails. Several metal handrails were in "fair" or "poor" condition with cracking, flaking, or chipping deterioration noted. Only two stairs in 52 units tested were positive for LBP.

For the bathrooms, of the 52 tested units, wood framing around the door (98% - not including the jamb), wood trim on the bathroom walls (89%) bathroom walls (75%), bathroom ceilings, (68%), and painted wall headers (27%) tested positive for LBP.

In the bedrooms, 33% of the units tested had LBP on at least one ceiling. Five bedroom wall headers and one bedroom wall tested positive for LBP (less than 5%).

In the hallways, 13% of tested ceilings were positive for LBP. In the living rooms, 17% of tested ceilings and less than 5% of tested wall headers were positive for LBP.

According to the HUD guidelines used to select the number of units tested, and Figure 7.3, the Multi-family Decision Flowchart (see below), the testing provides a 95% confidence that less than 5% of the units might contain LBP on the concrete porch threshold, kitchen headers and walls, stair treads, bedroom wall headers and walls, and living room wall headers. The data qualifies the specific test locations as LBP free according to EPA and HUD exemptions. Specific locations and lead content are indicated in Appendix A, Table 1 and in Appendix C, the XRF Field Data Collection Forms.

Based on the review of a **Limited Lead-Based Paint Inspection Report** conducted in February 2013, and a **Supplemental Limited Lead-Based Paint Inspection Report** conducted in April 2013, both by QE2, 44 out of 244 (18%) of the bathroom ceilings tested positive for LBP. This work was performed in support of planned renovations to bathrooms, kitchens, and living rooms. Proposed air conditioner installation locations (living room and bedroom walls) and kitchen exhaust fan locations (above the kitchen cabinets and sinks) from both the 1939 apartments and the 1950's apartments tested negative for LBP in 2013. The report from the two separate field events in February and March, 2013 is included in Appendix D.

1959-304 Apartments

Of the 3,819 locations tested at the 1959-304 apartments, 205 test locations indicated values exceeding the TDEC/EPA/HUD standard of ≥ 1.0 mg/cm² by XRF.

According to the maintenance supervisor, the exterior porches and related supports were removed and replaced after the 2013 assessment. Five of the newer porches were assessed (post, support, eaves, and exterior wall) and none of the coatings were found to contain lead; therefore, a determination was made that the newer porch components do not have LBP coatings. An original metal handrail at unit 261 was positive for LBP. Testing of the exterior door frames (52%) and exterior jambs (32%) indicated LBP in some locations.

In the kitchens, only one painted pantry shelf in unit 266 tested positive for LBP.

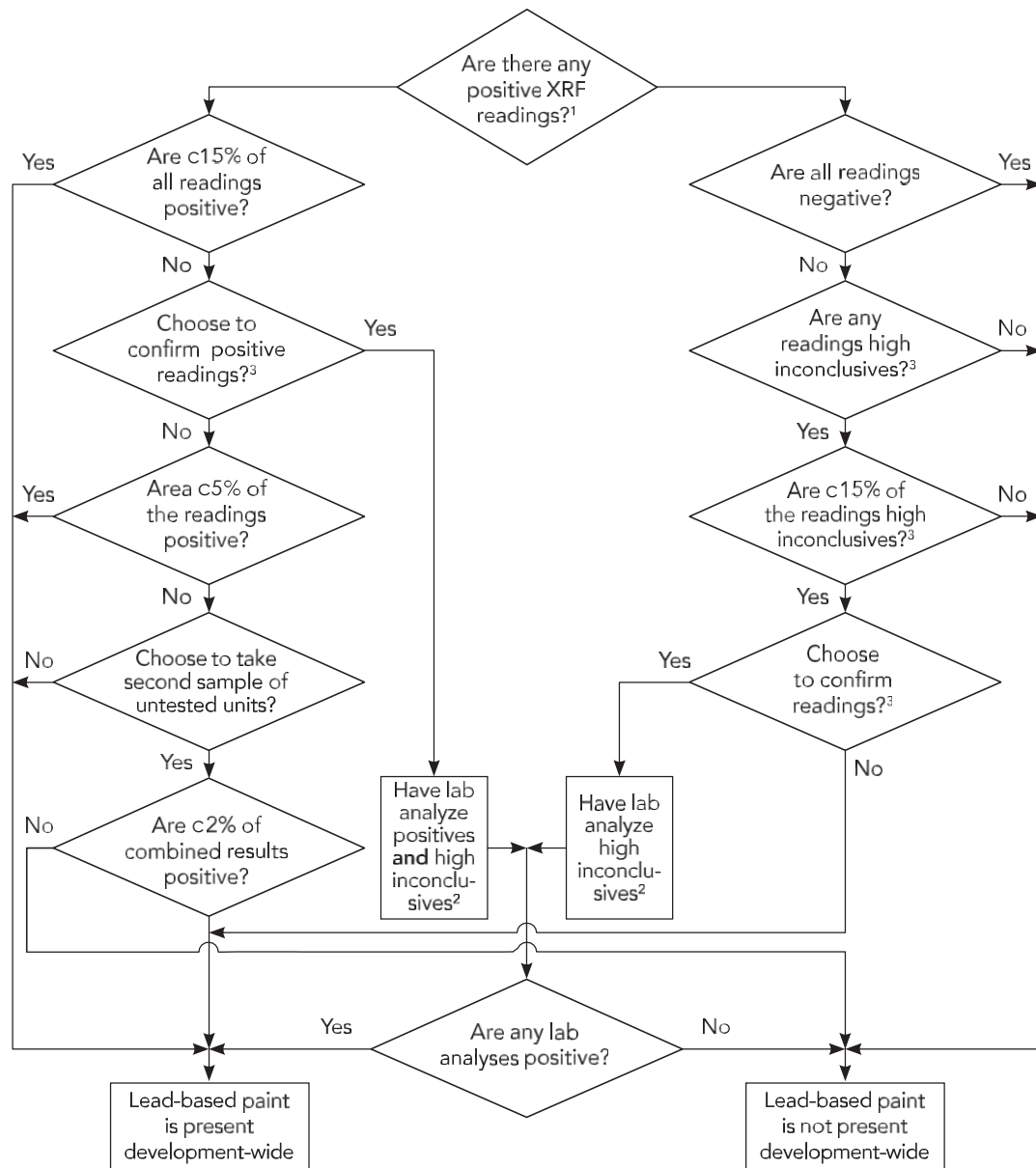
All but one (unit 302) of the tested apartments with stairwells indicated LBP on stairwell components (risers, stringers, and/or handrails). Of the first and second floor ½-wall metal caps and ends that are adjacent to the stairwells, 27% tested positive for LBP.

For the bathrooms, the wood trim inset in the gypsum walls tested positive for LBP in only two units, providing a 95% confidence that less than 5% of the bathrooms within the 1959-304 apartments might contain LBP. Only one bedroom wall (unit 452) and one support beam (bedroom of unit 468) tested positive for LBP.

The painted metal closet rods, found in bedroom, living room, and hall closets, was positive for LBP in 64% of the units tested. Less than 5% of the painted wood closet shelf supports and shelves tested positive for LBP. In the living rooms, only one wall (unit 261) tested positive for LBP.

Figure from HUD **Guidelines for the Evaluation and Control of Lead-Based Paint Hazards in Housing, Second Edition, July 2012.**

FIGURE 7.3 Multi-family Decision Flowchart



According to the HUD guidelines used to select the number of units tested, and Figure 7.3, the Multi-family Decision Flowchart, from the **2012 HUD Guidelines for the Evaluation and Control of Lead-Based Paint Hazards in Housing, Second Edition**, the testing provides a 95% confidence that less than 5% of the units might contain LBP on the entrance interior door jambs, closet shelf supports and closet shelves, living room walls, kitchen pantry shelves, the wood trim inset into the gypsum bathroom walls, bedroom walls, and bedroom concrete support beams which qualifies the specific test locations as LBP free according to EPA and HUD exemptions. Specific locations and lead content are indicated in Appendix A, Table 2 and in Appendix C, the XRF Field Data Collection Forms for Section 304.

Main Office

Within and around the Main Office, 201 locations were tested and 38 locations indicated values ≥ 1.0 mg/cm² by XRF. LBP was not found in the 2nd story, office portion of the building, although minimal lead concentrations were present in some testing locations (< 1.0 mg/cm² by XRF).

In the stairwell leading to the basement, the handrail and treads tested positive for LBP. Additionally, the painted concrete columns, several walls, door and entry frames, door jambs, a door, windows on the east – side wall, one original window in the maintenance office (which includes the window frame, sill, and apron), and a wall header in the tool room tested positive for LBP.

On the exterior of the Main Office, LBP was detected on the yellow retaining wall, the painted yellow bollards located near the maintenance entrance, and the brown exterior maintenance entrance door. Specific locations and lead content are indicated in Appendix A, Table 3 and in Appendix C, the XRF Field Data Collection Forms.

Boys and Girls Club building

Of the 152 locations tested at the Boys and Girls Club building, 21 locations indicated values ≥ 1.0 mg/cm² by XRF. LBP was confirmed on the metal door frames, wall base, and columns in the gymnasium area. Wood door frames and jambs in the Science Room, Stage, Storage, and Tech Lab rooms were positive for LBP. The accessible ceiling beams on the Stage were also positive for LBP.

On the exterior of the building, the beige wood porch ceiling at the building entrance and south wall entrance, the brown metal support columns, and downspouts located around the structure were positive for LBP. Specific locations and lead content are indicated in Appendix A, Table 4 and in Appendix C, the XRF Field Data Collection Forms.

Mail Drop building

Of the 32 test locations identified in the accessible portions of the Mail Drop building, none indicated values ≥ 1.0 mg/cm² by XRF.

Some painted surfaces within all the buildings contain levels of lead below 1.0 mg/cm², and are not considered LBP. Work at these areas could create lead dust or lead-contaminated soil hazards if the paint is turned into dust by abrasion, scraping, or sanding.

3.0 CONCLUSIONS AND RECOMMENDATIONS

QE2 determined the number of units to test for each phase of construction based on HUD guidelines. A total 52 of the older units and 50 of the newer units were tested. The complex owners, managers, maintenance staff, and renovation and repair contractors may use the information reported in this report to ensure the environmentally compliant handling and/or disposal of all lead-containing materials, in accordance with all local, state, and federal regulations.

QE2 conducted a surface by surface assessment of building components in the field using a portable XRF instrument. Approximately 4,674 locations were tested at the 1939 apartments (designated by KCDC as the "301" units). Of those, 1,025 of the test locations indicated lead concentrations greater than or equal to the TDEC/EPA/HUD standard for classification as LBP (≥ 1.0 mg/cm² by XRF). Of the 3,819 test locations sampled at the 1959 apartments, (designated by KCDC as the "304" units), 205 test locations indicated values exceeding TDEC/EPA/HUD standard of ≥ 1.0 mg/cm² by XRF. Within and around the Main Office, 201 locations were tested and 38 locations indicated values ≥ 1.0 mg/cm² by XRF. At the Boys and Girls Club building, 152 locations were tested and 21 locations indicated values ≥ 1.0 mg/cm² by XRF. None of the 32 locations tested at the Mail Drop building indicated values ≥ 1.0 mg/cm² by XRF. The following indicates all surfaces that were found to be LBP containing.

1939-301 Apartments

Based on the test results, all of the exterior porch components tested positive for LBP. Several metal posts were in "fair" or "poor" condition with cracking, flaking, or alligating deterioration noted. Additionally, the exterior wood door jambs tested positive for LBP.

In the kitchens, the windows, wood framing (not including the jamb) around the kitchen entry, wood framing around the pantry areas (frame and jamb), and if present, rear entrance door frames, and ceilings are considered LBP containing, since greater than 15% of all readings were positive.

In the units with stairwells, LBP was present on the first and second floor 1/2-wall metal caps and ends that are adjacent to the stairwells, and the stairwell risers, stringers, and handrails. Several metal handrails were in “fair” or “poor” condition with cracking, flaking, or chipping deterioration noted.

For the bathrooms; wood framing around the door (not including the jamb), wood trim on the bathroom walls, bathroom walls, bathroom ceilings, and painted wall headers tested positive for LBP.

In the hallways, 13% of tested ceilings were positive for LBP. In the living rooms, 17% of tested ceilings were positive for LBP. Components with $\geq 15\%$ positive readings can be further tested for potential reclassification as “positive in isolated locations” or determined site wide in each location if desired or until that time that those areas will be abated or renovated.

1959-304 Apartments

An original metal handrail at unit 261 was positive for LBP. The exterior door frames and exterior jambs are considered to be LBP coated.

In the units with stairwells, LBP was present on the first and second floor 1/2-wall metal caps and ends that are adjacent to the stairwells, and the stairwell risers, stringers, and handrails.

The painted metal closet rods, found in bedroom, living room, and hall closets, is considered LBP coated.

Main Office

The stairwell handrail and treads tested positive for LBP. In the basement area, the painted concrete columns, several walls, door and entry frames, door jambs, one door, windows on the east – side wall, one original window in the maintenance office (which includes the window frame, sill, and apron), and a wall header in the tool room tested positive for LBP.

On the exterior of the Main Office, LBP was detected on the yellow retaining wall, the painted yellow bollards located near the maintenance entrance, and the brown exterior maintenance entrance door.

Boys and Girls Club building

LBP was confirmed on the metal door frames, wall base, and columns in the gymnasium area. Wood door frames and jambs in the Science Room, Stage, Storage, and Tech Lab, and the ceiling beams on the Stage were positive for LBP.

On the exterior of the building, the beige wood porch ceiling at the building entrance and south wall entrance, the brown metal support columns, and downspouts located around the structure were positive for LBP.

The results of this inspection indicate that lead in amounts greater than or equal to 1.0 mg/cm² was found in paint on several building components as noted above, using the inspection protocol in Chapter 7 of the ***HUD Guidelines for the Evaluation and Control of Lead-Based Hazards in Housing (2nd Edition, July 2012)***. This report should be kept by the inspector and should also be kept by the owner and all future owners for the life of the dwelling.

Some painted surfaces within all the assessed buildings contained levels of lead below 1.0 mg/cm², that while not considered LBP, these areas could create lead dust or lead-contaminated soil hazards if the paint is turned into dust by abrasion, scraping, or sanding. OSHA standards apply to protect worker health if lead is present at any concentration. If the coating/paint on the building components is not LBP (<5,000 ppm or <1.0 mg/cm² by XRF), any unwanted building materials can be disposed in a construction and demolition (Class IV) landfill no matter the condition. During any planned renovations, the OSHA standard would apply when paint is removed by heating, sanding, scraping, abrasive blasting, or peeling. The OSHA standard is based on a time-weighted average of exposure to lead.

Based on previous test results in 2013, all of the air conditioner installation locations in the living rooms and bedrooms and kitchen exhaust fans above the kitchen oven/sink areas in the 301 and 304 apartments were negative for LBP.

Under the EPA's RRP Rule, contractors performing renovation, repair and painting projects that disturb LBP in homes, multi-family complexes, child care facilities, and schools built before 1978 must be certified and must follow specific work practices to prevent lead contamination and occupant exposure, including containing lead dust and debris, and testing potential waste.

Results of this inspection must be provided to new lessees (tenants) and prospective buyers of this property under Federal law (24 CFR part 35 and 40 CFR part 745) before they become obligated under a lease or sales contract. The complete report must be provided by the owner to prospective buyers and it must be made available to prospective tenants, and to renewing

tenants if they have not been provided the information previously. The inspector's plain language summary of the report must be provided to the client (e.g., property owner or manager) when the complete report is provided. The landlord (lessor) or seller is also required to distribute an educational pamphlet approved by the U.S. Environmental Protection Agency and include the Lead Warning Statement in the leases or sales contracts to ensure that parents have the information they need to protect their children from lead-based paint hazards. Complete disclosure requires the landlord/sellers and renters/buyers (and their agents) to sign and date acknowledgement that the required information and materials were provided and received. Also, prospective buyers must be provided the opportunity to have their own lead-based paint inspection, lead hazard screen or risk assessment performed before the purchase agreement is signed; the standard period is 10 days, but this period may be changed or waived by agreement between the seller and prospective buyer. EPA regulations require the inspector to keep the inspection report for at least 3 years. (See section IV of chapter 7 of the HUD Guidelines for the Evaluation and Control of Lead-Based Paint Hazards in Housing for further details; see www.hud.gov/lead.)

Since the site buildings are over 50 years old, they may be eligible for listing on the National Register of Historic Places, a state register, or other local inventory. In historic properties, interim controls are generally preferred over abatement strategies because they preserve the integrity of the structure. However, if the property receives federal housing assistance, the amount and type of housing assistance may contribute to a determination of the approach(es) taken to control lead hazards. The Lead Safe Housing Rule applies if the property receives federal housing or rehabilitation assistance. (24 CFR Part 35, Subparts B–R).

Conducting interim controls of lead-based paint hazards in multi-family housing presents issues not generally found in single-family housing. In most occupied multi-family developments, it is not feasible, financially or logistically, to carry out hazard control activity in all dwelling units at once. In properties with a relatively small number of dwelling units, it may be possible to proceed unit by unit and complete the hazard control work quickly. In larger properties, however, decisions must be made as to the order of work in dwelling units and common areas, and perhaps, in rooms or components within dwelling units and common areas. Even when an entire building is vacant and undergoing renovation, hazard control elements of the work must be identified and scheduled. Therefore, it is usually advisable that there be a lead hazard control plan for properties with more than 10 units. Lead hazard control plans and their recommended strategies for control measures of LBP are discussed more fully in Chapter 11, Interim Controls of the *HUD Guidelines for the Evaluation and Control of Lead-Based Hazards in Housing (2nd Edition, July 2012)*.

4.0 DISCLAIMER

The LBP survey reported herein is for the Western Heights Apartment complex site at 1621 Jourolman Avenue in Knoxville, Tennessee, and relies solely on conditions visually observed and readily accessible for sampling on July 6 through 31, 2018. This report does not constitute an agreement to indemnify or insure any party against any liability of expense.

APPENDIX A

Summary Spreadsheets for Sections 301 and 304 and Positive XRF Measurement Location Tables

1939 Apartments - Section 301

Positive Lead-Based Paint Locations

Unit #	Door Jamb	Porch	Kitchen Window	Kitchen Entry Frame	Kitchen Trim	Kitchen Header	Kitchen Ceiling	Stairwell	Bath Door Frame	Bath Door	Bath Trim	Bath Wall	Bath Ceiling	Bath Header	Bedroom Ceiling	Bedroom Header	Bedroom Wall	Hall Ceiling	Living Room Ceiling	Living Room Header	Porch Threshold	Kitchen Wall
2		x	x	x																		
3	x	x	x	x	x			x	x		x	x	x		x							
5	x	x	x	x	x			x	x		x	x	x									
7	x	x	x	x	x		x	x	x		x	x	x		x							
10	x	x	x	x	x			x	x		x	x	x									
19	x	x	x	x	x				x		x	x	x									
31	x	x	x	x	x			x	x		x	x	x									
33	x	x	x	x	x				x		x	x			#3			x				
35	x	x	x	x	x			x	x		x	x			#3, #4			x	x			
37	x	x	x	x	x	x	x	x	x		x	x	x		#5							
41	x	x	x	x	x		x	x	x		x	x	x	x	#3				x			
42	x	x	x	x	x			na	x		x		x							x		
45	x	x	x	x	x			x	x			x		x	x							
52	x	x	x	x	x	x	x	x	x		x	x	x									
56		x	x	x	x			x	x				x			#4						
57	x	x	x	x	x			x	x		x	x										
58	x	x	x	x	x			na	x		x	x	x									
62	x	x	x	x	x			x	x		x	x		x								
74	x	x	x	x	x			x	x		x	x	x									
88	x	x	x	x	x			x	x		x		x		#4							
95	x	x	x	x	x			x	x		x	x										
112	x	x	x	x				na	x		x											
113	x	x	x					na														
117	x	x	x	x	x		x	x	x	x	x	x	x		#3, #4							
118	xx				x			x	x		x	x	x		#5				x			
131	x	x	x	x	x			x	x		x	x			#3				x			
136	x	x	x	x				na	x		x				#3							
140	x	x	x	x	x			x	x		x	x	x		#4, #5			x	x			
155	x	x	x	x	x		x	x	x		x	x	x						x		x	
164	x	x	x	x	x	x	x	na	x		x	x	x	x	#3			x	x	x		
165	x	x	x	x	x		x	x	x		x	x	x	x		#3			x			
169	x	x	x	x	x			na	x		x	x	x	x			#4, A	x				
171	x	x	x	x	x			x	x		x	x	x									
191	x	x	x	x	x			na	x		x	x	x	x								
192	x	x	x		x			x	x		x	x		x								
194	x	x	x	x	x			na	x		x	x	x	x	x							
201		x	x	x	x			x	x		x	x	x	x								
203	x	x	x		x	x		x	x		x	x	x	x								
209	x	x	x						x		x	x	x									
220	x	x	x	x	x		x	x	x		x	x	x	x	#4	#4			x	x		
239	x	x	x		door			na														
243	x	x	x					na	x		x											
51	x	x	x	x	door			x	x		x		x									
157	x	x	x	x	x		x	na	x		x	x	x									
68	x	x	x	x	x			x	x		x	x	x		#3, #4							
4	x	x	x	x	x			x	x		x	x	x									
11	x	x	x	x	x				x		x	x	x			#3		x				C
20	x	x	x		x			x	x		x	x		x		x						
49	x	x	x		x				x		x	x	x	x					x			
108	x	x	x	x				x	x		x											
198	x	x	x		x			x	x		x	x	x									
16*	x		x		x			x	x		x		x									
153*	x	x			x			na	x		x		x									

* = data obtained from previous assessment dated 9/7/2010

na - not applicable/no stairway

**Table 1 - 1939 Apartment Units
Positive XRF Measurement Locations**

Assay #	Sample Description & Location	Lead Content (mg/cm²)
12	Kitchen window frame – Unit 1	2.3
14	Kitchen window apron – Unit 1	3.5
15	Kitchen window frame – Unit 1	2.7
16	Kitchen window apron – Unit 1	2.0
58	Front porch wood post – Unit 1	11.1
59	Front porch vinyl covered wood header – Unit 1	17.7
61	Front porch wood post – Unit 2	11.6
62	Front porch vinyl covered wood header – Unit 2	11.5
63	Front porch wood support beam – Unit 2	10.0
117	Kitchen window frame – Unit 2	2.4
118	Kitchen window sill – Unit 2	1.8
119	Kitchen window apron – Unit 2	1.4
121	Kitchen window frame – Unit 2	1.6
122	Kitchen window sill – Unit 2	1.3
123	Kitchen window apron – Unit 2	2.0
126	Kitchen entry frame – Unit 2	2.4
129	Front porch metal post – Unit 3	12.4
130	Front porch vinyl covered wood header – Unit 3	10.2
142	Kitchen entry frame – Unit 3	1.8
149	Kitchen window frame – Unit 3	2.2
150	Kitchen window sill – Unit 3	2.0
151	Kitchen window apron – Unit 3	1.8
152	Kitchen door frame – Unit 3	2.3
155	Kitchen window frame – Unit 3	2.6
156	Kitchen window sill – Unit 3	2.3
157	Kitchen window apron – Unit 3	1.9
159	Half wall trim – Unit 3	2.4
160	Stairwell cap – Unit 3	2.7
162	Stairwell riser – Unit 3	2.8
163	Stairwell stringer – Unit 3	3.5
164	Stairwell handrail – Unit 3	1.8

Assay #	Sample Description & Location	Lead Content (mg/cm²)
167	Exterior door jamb – Unit 3	8.9
170	Bathroom wall A – Unit 3	1.5
171	Bathroom wall trim – Unit 3	1.9
172	Bathroom door frame – Unit 3	3.1
174	Bathroom wall B – Unit 3	1.7
178	Bathroom wall D – Unit 3	1.1
179	Bathroom wall D trim – Unit 3	2.0
190	Bedroom #4 ceiling (repair on closet half) – Unit 3	1.3
201	Bedroom #5 ceiling – Unit 3	1.7
204	Stairwell endcap, 2 nd story – Unit 3	2.0
205	Front porch metal post – Unit 5	14.3
207	Front porch vinyl covered wood header – Unit 5	6.1
208	Exterior door jamb – Unit 5	11.5
211	Stairwell riser – Unit 5	1.6
212	Stairwell stringer – Unit 5	1.0
213	Stairwell handrail – Unit 5	3.9
226	Stairwell endcap – Unit 5	2.1
231	Bathroom door frame – Unit 5	2.7
232	Bathroom wood wall trim – Unit 5	2.7
233	Bathroom wall A – Unit 5	1.1
236	Bathroom wall molding – Unit 5	1.2
237	Bathroom ceiling – Unit 5	1.9
239	Bathroom wall C – Unit 5	1.3
240	Bathroom wall C – Unit 5	1.2
241	Bathroom wall D – Unit 5	1.0
253	Kitchen entry frame – Unit 5	2.4
259	Kitchen window frame – Unit 5	3.2
261	Kitchen window apron – Unit 5	2.8
263	Kitchen wall D trim next to pantry – Unit 5	3.7
264	Kitchen wall C trim next to pantry – Unit 5	1.9
270	Front porch metal post – Unit 7	13.6
271	Front porch vinyl covered wood header – Unit 7	7.7
273	Exterior wood door jamb – Unit 7	1.5
286	Kitchen entry frame – Unit 7	3.0

Assay #	Sample Description & Location	Lead Content (mg/cm²)
292	Kitchen window frame – Unit 7	3.0
293	Kitchen window sill – Unit 7	1.8
294	Kitchen window apron – Unit 7	2.5
295	Kitchen door frame – Unit 7	2.2
300	Stairwell metal wall cap – Unit 7	1.3
302	Stairwell riser – Unit 7	1.6
303	Stairwell stringer – Unit 7	5.4
304	Stairwell handrail – Unit 7	10.0
311	Bathroom wood wall A trim – Unit 7	1.5
312	Bathroom wall B – Unit 7	1.0
316	Bathroom wood wall D trim – Unit 7	2.2
341	Front porch metal post – Unit 10	10.3
342	Front porch vinyl covered wood header – Unit 10	11.3
344	Exterior wood door jamb – Unit 10	13.4
358	Kitchen entry frame – Unit 10	3.5
362	Kitchen ½-wall wood trim – Unit 10	4.1
363	Kitchen pantry wood trim – Unit 10	1.0
366	Kitchen window trim – Unit 10	2.8
373	Stairwell metal wall cap – Unit 10	3.8
375	Stairwell riser – Unit 10	1.2
376	Stairwell stringer – Unit 10	4.0
377	Stairwell handrail – Unit 10	5.8
380	2 nd floor ½-wall cap – Unit 10	1.3
403	2 nd floor bathroom door trim – Unit 10	1.8
405	2 nd floor bathroom wall A trim – Unit 10	1.9
406	2 nd floor bathroom wall – Unit 10	1.1
412	2 nd floor bathroom wall D trim – Unit 10	1.9
413	Bathroom ceiling – Unit 10	2.1
416	Front porch metal post – Unit 19	13.5
418	Front porch vinyl covered wood header – Unit 19	7.6
419	Front porch vinyl covered wood ceiling – Unit 19	7.1
432	Kitchen entry frame – Unit 19	3.4
436	Kitchen closet trim – Unit 19	2.1
437	Kitchen closet jamb – Unit 19	1.7

Assay #	Sample Description & Location	Lead Content (mg/cm²)
438	Kitchen inside closet trim – Unit 19	1.1
439	Kitchen door trim – Unit 19	3.5
440	Kitchen exterior door trim – Unit 19	8.2
441	Kitchen window frame – Unit 19	3.5
443	Kitchen window apron – Unit 19	2.4
458	Bathroom door frame – Unit 19	2.0
459	Bathroom wall A wood trim– Unit 19	1.7
460	Bathroom wall A below trim – Unit 19	1.8
461	Bathroom wall B above wood trim – Unit 19	1.1
462	Bathroom wall B wood trim – Unit 19	1.7
463	Bathroom wall C – Unit 19	1.5
466	Bathroom ceiling – Unit 19	1.4
474	Front porch metal post – Unit 31	18.4
476	Front porch vinyl covered wood header – Unit 31	11.0
477	Front porch vinyl covered wood ceiling – Unit 31	2.4
479	Living room exterior door jamb – Unit 31	10.6
492	Kitchen entry frame – Unit 31	1.8
496	Kitchen wood pantry trim – Unit 31	1.6
497	Kitchen pantry ½-wall – Unit 31	1.6
498	Kitchen wall end cap – Unit 31	2.8
499	Kitchen wall A pantry trim – Unit 31	2.1
501	Kitchen window frame – Unit 31	2.1
502	Kitchen window sill – Unit 31	2.9
503	Kitchen window apron – Unit 31	2.0
504	Kitchen wall C wood door frame – Unit 31	1.9
507	Kitchen wall C window frame – Unit 31	3.3
508	Kitchen wall C window sill – Unit 31	1.6
509	Kitchen wall C window apron – Unit 31	2.0
512	Stairwell wall cap top– Unit 31	1.1
513	Stairwell wall cap end– Unit 31	2.5
514	Stairwell railing – Unit 31	8.0
516	Stairwell riser – Unit 31	2.3
517	Stairwell stringer – Unit 31	5.3
538	Bathroom door frame – Unit 31	3.8

Assay #	Sample Description & Location	Lead Content (mg/cm²)
539	Bathroom wall A wood trim– Unit 31	3.9
540	Bathroom wall A below trim – Unit 31	1.3
541	Bathroom wall B above wood trim – Unit 31	2.1
542	Bathroom wall C – Unit 31	1.7
543	Bathroom wall C header – Unit 31	1.8
544	Bathroom wall D – Unit 31	1.4
545	Bathroom ceiling – Unit 31	2.1
548	Stairwell 2 nd floor ½-wall cap – Unit 31	1.5
551	Front porch metal post – Unit 33	12.2
552	Front porch vinyl covered wood header – Unit 33	14.1
553	Front porch exterior wood door jamb – Unit 33	10.7
571	Living room ceiling – Unit 33	1.1
572	Kitchen entry frame – Unit 33	2.5
576	Kitchen pantry frame wall B – Unit 33	1.9
577	Kitchen pantry jamb – Unit 33	2.4
579	Kitchen pantry frame wall C – Unit 33	1.4
580	Kitchen window frame – Unit 33	2.7
582	Kitchen window apron – Unit 33	2.3
597	Bedroom #3 ceiling – Unit 33	1.1
599	Bathroom door frame – Unit 33	3.0
600	Bathroom wall A wood trim – Unit 33	2.1
601	Bathroom wall A – Unit 33	1.3
604	Bathroom wall B below wood trim – Unit 33	2.3
607	Bathroom wall D header – Unit 33	1.5
618	Hallway ceiling – Unit 33	1.2
620	Stairwell foyer header – Unit 33	1.1
621	Back door wood exterior door jamb – Unit 35	10.1
622	Front porch metal post – Unit 35	11.2
623	Front porch vinyl covered wood header – Unit 35	9.8
625	Front door wood exterior door jamb – Unit 35	10.4
639	Living room ceiling – Unit 35	1.2
640	Kitchen entry frame – Unit 35	3.2
644	Kitchen pantry frame wall B – Unit 35	3.2
645	Kitchen pantry jamb wall B – Unit 35	2.7

Assay #	Sample Description & Location	Lead Content (mg/cm²)
646	Kitchen pantry outer wall frame – Unit 35	2.5
647	Kitchen wood door frame – Unit 35	2.5
649	Kitchen window frame – Unit 35	3.2
650	Kitchen window apron – Unit 35	2.5
655	Stairwell wall cap end– Unit 35	2.0
657	Stairwell riser– Unit 35	2.5
658	Stairwell stringer – Unit 35	2.9
659	Stairwell handrail – Unit 35	14.3
662	Stairwell 2 nd floor wall cap end – Unit 35	2.9
673	Bedroom #3 ceiling – Unit 35	1.1
683	Bedroom #4 ceiling – Unit 35	1.4
684	Bathroom door frame – Unit 35	1.7
685	Bathroom wall A wood trim – Unit 35	2.2
686	Bathroom wall A below wood trim – Unit 35	1.7
688	Bathroom wall B below wood trim – Unit 35	1.3
690	Bathroom wall D above wood trim – Unit 35	1.8
701	Hallway ceiling – Unit 35	1.2
704	Back entrance exterior door jamb – Unit 37	8.5
705	Front porch metal post – Unit 37	14.6
706	Front porch vinyl covered wood header – Unit 37	12.6
708	Front porch exterior wood door jamb – Unit 37	11.7
722	Kitchen entry frame – Unit 37	2.9
727	Kitchen pantry half-wall trim – Unit 37	2.2
728	Kitchen pantry half-wall jamb – Unit 37	6.9
729	Kitchen pantry outer wall frame – Unit 37	2.7
730	Kitchen door frame – Unit 37	3.7
732	Kitchen window frame – Unit 37	3.9
733	Kitchen window sill – Unit 37	2.8
734	Kitchen window apron – Unit 37	2.5
735	Kitchen wall C header – Unit 37	1.2
738	Kitchen ceiling – Unit 37	1.1
740	Stairwell wall cap end– Unit 37	1.5
742	Stairwell riser– Unit 37	1.7
743	Stairwell stringer – Unit 37	1.9

Assay #	Sample Description & Location	Lead Content (mg/cm²)
744	Stairwell handrail – Unit 37	3.7
748	Stairwell 2nd floor wall cap end – Unit 37	1.1
785	Bedroom #5 ceiling – Unit 37	1.3
786	Bathroom door frame – Unit 37	2.3
787	Bathroom wall A wood trim – Unit 37	2.1
788	Bathroom wall A below wood trim – Unit 37	1.8
790	Bathroom wall B below wood trim – Unit 37	2.2
792	Bathroom wall C header– Unit 37	1.3
794	Bathroom ceiling – Unit 37	1.8
795	Bathroom wall D below wood trim – Unit 37	2.2
806	Front porch metal post – Unit 41	14.6
807	Front porch vinyl covered wood header – Unit 41	7.4
808	Front porch exterior wood door jamb – Unit 41	8.4
811	Stairwell riser– Unit 41	2.7
812	Stairwell stringer – Unit 41	4.0
813	Stairwell handrail – Unit 41	1.0
818	Stairwell 2nd floor wall cap end – Unit 41	1.0
830	Living room ceiling – Unit 41	1.1
831	Kitchen entry frame – Unit 41	2.6
834	Kitchen ½-wall pantry frame – Unit 41	2.6
835	Kitchen outer wall pantry frame – Unit 41	1.6
836	Kitchen entry frame – Unit 41	2.4
837	Kitchen window sill – Unit 41	1.6
838	Kitchen window apron – Unit 41	2.4
843	Kitchen ceiling – Unit 41	1.4
855	Bedroom #3 ceiling – Unit 41	1.1
856	Bathroom door frame – Unit 41	2.4
858	Bathroom wall A wood trim – Unit 41	2.7
860	Bathroom wall A above wood trim – Unit 41	1.0
861	Bathroom wall B above wood trim – Unit 41	1.0
862	Bathroom wall C below wood trim – Unit 41	1.7
864	Bathroom wall D header – Unit 41	1.4
865	Bathroom ceiling – Unit 41	1.8
877	Front porch metal post – Unit 42	11.9

Assay #	Sample Description & Location	Lead Content (mg/cm²)
878	Front porch vinyl covered wood header – Unit 42	4.9
880	Front porch exterior wood door jamb – Unit 42	9.0
894	Living room wall B header – Unit 42	1.2
896	Kitchen entry frame – Unit 42	2.6
898	Kitchen pantry trim – Unit 42	1.7
899	Kitchen pantry jamb – Unit 42	3.4
903	Kitchen door frame – Unit 42	5.3
905	Kitchen window frame – Unit 42	4.1
906	Kitchen window sill – Unit 42	3.8
907	Kitchen window apron – Unit 42	3.0
923	Bathroom door frame – Unit 42	1.7
924	Bathroom wall A wood trim – Unit 42	1.9
932	Bathroom ceiling – Unit 42	1.3
943	Front porch metal post – Unit 45	15.0
944	Front porch vinyl covered wood header – Unit 45	9.7
945	Front porch exterior wood door jamb – Unit 45	5.9
960	Kitchen entry frame – Unit 45	2.7
964	Kitchen pantry door frame – Unit 45	3.0
965	Kitchen pantry jamb – Unit 45	2.6
966	Kitchen pantry frame – Unit 45	1.8
969	Kitchen window frame – Unit 45	4.0
970	Kitchen window sill – Unit 45	1.0
971	Kitchen window apron – Unit 45	2.8
978	Stairwell riser– Unit 45	1.4
979	Stairwell stringer – Unit 45	1.2
980	Stairwell handrail – Unit 45	2.9
983	Stairwell 2nd floor ½-wall cap – Unit 45	2.1
984	Stairwell 2nd floor ½-wall end – Unit 45	3.4
1016	Bathroom door frame – Unit 45	2.3
1017	Bathroom wall A below wood trim – Unit 45	2.0
1019	Bathroom wall A above wood trim – Unit 45	1.0
1020	Bathroom wall B below wood trim – Unit 45	1.1
1021	Bathroom wall C – Unit 45	1.3
1022	Bathroom wall C header– Unit 45	1.7

Assay #	Sample Description & Location	Lead Content (mg/cm²)
1023	Bathroom ceiling – Unit 45	1.0
1024	Bathroom wall D – Unit 45	1.3
1038	Back exterior door wood jamb – Unit 45	9.4
1039	Front porch metal post – Unit 52	12.6
1041	Front porch vinyl covered wood header – Unit 52	9.5
1042	Front porch exterior wood door jamb – Unit 52	12.6
1059	Kitchen entry frame– Unit 52	2.9
1061	Kitchen wall A header – Unit 52	1.2
1065	Kitchen window frame – Unit 52	4.4
1066	Kitchen window sill – Unit 52	2.9
1067	Kitchen window apron – Unit 52	3.1
1069	Kitchen door frame – Unit 52	2.7
1071	Kitchen ½-wall pantry frame – Unit 52	3.5
1072	Kitchen ½-wall pantry jamb – Unit 52	2.5
1073	Kitchen pantry frame back wall – Unit 52	1.6
1075	Kitchen ceiling – Unit 52	1.5
1077	Stairwell ½-wall end – Unit 52	2.4
1079	Stairwell riser– Unit 52	1.4
1080	Stairwell stringer – Unit 52	2.8
1081	Stairwell handrail – Unit 52	6.9
1085	Bathroom door frame – Unit 52	3.1
1086	Bathroom wall A wood trim – Unit 52	3.3
1088	Bathroom wall A below wood trim – Unit 52	1.0
1092	Bathroom wall C header – Unit 52	1.1
1094	Bathroom ceiling – Unit 52	1.0
1096	Bathroom wall D below wood trim – Unit 52	1.2
1129	Exterior wood door jamb – Unit 52	8.7
1130	Front porch metal post – Unit 56	12.6
1132	Front porch vinyl covered wood header – Unit 56	9.8
1135	Stairwell riser– Unit 56	1.5
1136	Stairwell stringer – Unit 56	2.0
1137	Stairwell handrail – Unit 56	3.7
1139	Stairwell ½-wall cap – Unit 56	1.1
1140	Stairwell ½-wall end – Unit 56	2.6

Assay #	Sample Description & Location	Lead Content (mg/cm²)
1153	Kitchen entry frame – Unit 56	2.6
1158	Kitchen window frame – Unit 56	3.4
1160	Kitchen window apron – Unit 56	3.0
1161	Kitchen pantry frame – Unit 56	2.2
1163	Kitchen pantry jamb – Unit 56	2.0
1164	Kitchen pantry frame – Unit 56	3.1
1168	Bathroom door frame – Unit 56	1.6
1174	Bathroom ceiling – Unit 56	1.8
1186	Bedroom #4 wall C header – Unit 56	1.0
1202	Front porch metal post – Unit 57	16.7
1203	Front porch vinyl covered wood header – Unit 57	11.6
1204	Front porch exterior wood door jamb – Unit 57	10.1
1207	Stairwell riser– Unit 57	1.0
1208	Stairwell stringer – Unit 57	1.2
1209	Stairwell handrail – Unit 57	7.6
1211	Stairwell ½-wall end – Unit 57	1.2
1226	Kitchen entry frame – Unit 57	2.8
1230	Kitchen pantry frame wall B – Unit 57	2.7
1231	Kitchen pantry jamb wall B – Unit 57	2.7
1233	Kitchen pantry frame wall C – Unit 57	1.9
1234	Kitchen window frame – Unit 57	2.3
1235	Kitchen window sill – Unit 57	1.2
1236	Kitchen window apron – Unit 57	2.0
1254	Bathroom door frame – Unit 57	2.6
1255	Bathroom wall A wood trim – Unit 57	3.0
1258	Bathroom wall B below trim – Unit 57	1.0
1275	Front porch metal post – Unit 58	17.8
1276	Front porch vinyl covered wood header – Unit 58	6.3
1277	Front porch exterior wood door jamb – Unit 58	11.8
1294	Kitchen entry frame – Unit 58	7.9
1296	Kitchen pantry frame – Unit 58	2.2
1297	Kitchen pantry jamb – Unit 58	4.9
1302	Kitchen window frame – Unit 58	2.8
1303	Kitchen window sill – Unit 58	1.3

Assay #	Sample Description & Location	Lead Content (mg/cm²)
1304	Kitchen window apron – Unit 58	3.0
1322	Bathroom door frame – Unit 58	4.4
1323	Bathroom wall A wood trim – Unit 58	2.5
1327	Bathroom wall B below trim – Unit 58	1.1
1332	Bathroom ceiling – Unit 58	1.3
1344	Front porch metal post – Unit 62	15.7
1345	Front porch vinyl covered wood header – Unit 62	10.4
1346	Front porch exterior wood door jamb – Unit 62	9.2
1360	Kitchen entry frame – Unit 62	4.1
1366	Kitchen window frame – Unit 62	2.6
1368	Kitchen window apron – Unit 62	3.7
1369	Kitchen door frame – Unit 62	3.0
1371	Kitchen back door exterior jamb – Unit 62	13.1
1373	Kitchen pantry frame – Unit 62	3.2
1374	Kitchen pantry jamb – Unit 62	3.1
1375	Kitchen pantry exterior frame – Unit 62	4.5
1380	Stairwell ½-wall cap – Unit 62	2.1
1382	Stairwell riser– Unit 62	1.9
1383	Stairwell stringer – Unit 62	1.6
1384	Stairwell handrail – Unit 62	8.6
1387	Bathroom door frame – Unit 62	2.5
1388	Bathroom wall A wood trim – Unit 62	1.9
1389	Bathroom wall A below trim – Unit 62	1.6
1391	Bathroom wall B below trim – Unit 62	1.3
1393	Bathroom wall C header – Unit 62	1.3
1422	Stairwell ½-wall cap – Unit 62	1.8
1434	Front porch metal post – Unit 74	8.9
1435	Front porch vinyl covered wood header – Unit 74	12.1
1436	Front porch exterior wood door jamb – Unit 74	10.2
1444	Stairwell railing– Unit 74	4.6
1445	Stairwell ½-wall cap – Unit 74	2.5
1446	Stairwell ½-wall end – Unit 74	1.6
1461	Kitchen entry frame – Unit 74	1.9
1469	Kitchen window frame – Unit 74	3.9

Assay #	Sample Description & Location	Lead Content (mg/cm²)
1471	Kitchen window apron – Unit 74	3.1
1472	Kitchen pantry frame – Unit 74	2.3
1474	Kitchen pantry frame – Unit 74	2.7
1478	Bathroom door frame – Unit 74	2.0
1484	Bathroom wall D wood trim – Unit 74	2.1
1485	Bathroom wall D below trim – Unit 74	1.2
1486	Bathroom ceiling – Unit 74	1.2
1512	Front porch exterior wood door jamb – Unit 88	6.1
1527	Kitchen entry frame – Unit 88	2.5
1530	Kitchen pantry frame – Unit 88	2.7
1535	Kitchen window frame – Unit 88	3.4
1536	Kitchen window sill – Unit 88	1.2
1537	Kitchen window apron – Unit 88	2.0
1538	Kitchen door frame – Unit 88	2.8
1543	Stairwell ½-wall end – Unit 88	1.5
1545	Stairwell riser– Unit 88	1.4
1546	Stairwell stringer – Unit 88	1.4
1547	Stairwell handrail – Unit 88	8.0
1551	Bathroom door frame (top original) – Unit 88	2.3
1552	Bathroom wall A wood trim – Unit 88	1.7
1558	Bathroom ceiling – Unit 88	1.2
1569	Bedroom #4 ceiling – Unit 88	1.0
1581	Hallway ½-wall cap – Unit 88	1.6
1582	Hallway ½-wall end – Unit 88	1.6
1596	Front porch vinyl covered wood header – Unit 88	10.7
1597	Front porch exterior wood door jamb – Unit 88	13.9
1598	Front porch metal post – Unit 95	18.0
1599	Front porch vinyl covered wood header – Unit 95	9.1
1600	Front porch exterior wood door jamb – Unit 95	13.7
1615	Kitchen entry frame – Unit 95	2.1
1619	Kitchen ½-wall pantry frame – Unit 95	3.0
1620	Kitchen pantry jamb – Unit 95	3.1
1622	Kitchen window frame – Unit 95	3.5
1623	Kitchen window sill – Unit 95	2.1

Assay #	Sample Description & Location	Lead Content (mg/cm²)
1624	Kitchen window apron – Unit 95	3.5
1626	Kitchen door frame – Unit 95	2.4
1631	Stairwell ½-wall cap – Unit 95	1.9
1632	Stairwell ½-wall end – Unit 95	3.7
1636	Stairwell handrail– Unit 95	4.0
1663	Bathroom door frame – Unit 95	2.7
1667	Bathroom wall B wood trim – Unit 95	2.3
1672	2 nd story stairwell ½-wall cap – Unit 95	1.5
1673	2 nd story stairwell ½-wall end – Unit 95	2.0
1685	Front porch metal post – Unit 112	12.9
1687	Front porch vinyl covered wood header – Unit 112	8.5
1688	Front porch exterior wood door jamb – Unit 112	3.4
1731	Bathroom door frame – Unit 112	5.3
1732	Bathroom wall A wood trim – Unit 112	3.4
1738	Kitchen entry frame – Unit 112	2.5
1743	Kitchen window frame – Unit 112	6.5
1744	Kitchen window sill – Unit 112	5.4
1745	Kitchen window apron – Unit 112	5.6
1757	Front porch metal post – Unit 113	12.9
1758	Front porch vinyl covered wood header – Unit 113	8.5
1760	Front porch exterior wood door jamb – Unit 113	3.4
1777	Kitchen window frame – Unit 113	5.1
1778	Kitchen window sill – Unit 113	4.0
1779	Kitchen window apron – Unit 113	2.5
1829	Front porch metal post – Unit 117	11.0
1831	Front porch vinyl covered wood header – Unit 117	9.4
1832	Front porch exterior wood door jamb – Unit 117	8.5
1848	Kitchen entry frame – Unit 117	3.0
1849	Kitchen wall A pantry frame – Unit 117	2.7
1852	Kitchen ½-wall pantry jamb – Unit 117	3.1
1853	Kitchen wall B pantry frame – Unit 117	3.6
1856	Kitchen door frame – Unit 117	3.5
1857	Kitchen window frame – Unit 117	3.4
1858	Kitchen window sill – Unit 117	2.8

Assay #	Sample Description & Location	Lead Content (mg/cm²)
1859	Kitchen window apron – Unit 117	4.2
1864	Kitchen ceiling – Unit 117	1.2
1865	Stairwell ½-wall cap – Unit 117	1.6
1866	Stairwell ½-wall end – Unit 117	3.6
1867	Stairwell tread – Unit 117	1.1
1868	Stairwell riser– Unit 117	2.1
1869	Stairwell stringer – Unit 117	1.3
1870	Stairwell handrail – Unit 117	4.7
1885	Bedroom #3 ceiling – Unit 117	1.1
1896	Bedroom #4 ceiling – Unit 117	1.1
1898	Bathroom door frame – Unit 117	2.3
1899	Bathroom wall A wood trim – Unit 117	2.9
1901	Bathroom door inside – Unit 117	2.5
1902	Bathroom door outside – Unit 117	1.3
1903	Bathroom wall B, below wood trim – Unit 117	1.6
1907	Bathroom ceiling – Unit 117	1.8
1908	2 nd story stairwell ½-wall cap – Unit 117	2.4
1909	2 nd story stairwell ½-wall end – Unit 117	2.5
1933	Living room ceiling – Unit 118	1.3
1935	Kitchen pantry frame – Unit 118	1.6
1941	Kitchen door frame – Unit 118	2.8
1942	Kitchen exterior door jamb – Unit 118	8.3
1945	Kitchen window frame – Unit 118	2.8
1946	Kitchen window sill – Unit 118	3.0
1947	Kitchen window apron – Unit 118	4.2
1950	Stairwell ½-wall cap – Unit 118	1.2
1951	Stairwell ½-wall end – Unit 118	4.2
1952	Stairwell tread – Unit 118	1.5
1953	Stairwell riser– Unit 118	3.2
1954	Stairwell stringer – Unit 118	7.8
1955	Stairwell handrail – Unit 118	4.1
1959	Bathroom door frame – Unit 118	2.2
1960	Bathroom wall wood trim – Unit 118	2.6
1962	Bathroom wall below trim – Unit 118	1.0

Assay #	Sample Description & Location	Lead Content (mg/cm²)
1965	Bathroom wall D below trim – Unit 118	1.1
1968	Bathroom ceiling – Unit 118	1.4
1994	Bedroom #5 ceiling – Unit 118	1.5
1996	2nd story stairwell ½-wall cap – Unit 118	1.0
1997	2nd story stairwell ½-wall end – Unit 118	3.3
2008	Front porch metal post – Unit 131	9.2
2010	Front porch vinyl covered wood header – Unit 131	5.1
2011	Front porch exterior wood door jamb – Unit 131	2.4
2027	Living room ceiling – Unit 131	1.2
2028	Kitchen entry frame – Unit 131	4.7
2029	Kitchen wall A pantry frame – Unit 131	1.6
2033	Kitchen pantry ½-wall trim – Unit 131	1.8
2034	Kitchen pantry jamb – Unit 131	2.8
2036	Kitchen window frame – Unit 131	2.9
2037	Kitchen window sill – Unit 131	3.6
2038	Kitchen window apron – Unit 131	3.8
2041	Kitchen door frame – Unit 131	2.9
2046	Stairwell ½-wall cap – Unit 131	1.1
2047	Stairwell ½-wall end – Unit 131	2.9
2049	Stairwell riser– Unit 131	1.8
2050	Stairwell stringer – Unit 131	1.1
2051	Stairwell handrail – Unit 131	2.3
2066	Bedroom #3 ceiling – Unit 131	1.4
2079	Bathroom door frame – Unit 131	2.1
2080	Bathroom wall wood trim – Unit 131	1.8
2082	Bathroom wall A below trim – Unit 131	1.2
2084	Bathroom wall B below trim – Unit 131	1.2
2091	2nd story stairwell ½-wall cap – Unit 131	2.2
2092	2nd story stairwell ½-wall end – Unit 131	2.9
2104	Front porch metal post – Unit 136	11.8
2105	Front porch vinyl covered wood header – Unit 136	9.8
2107	Front porch exterior wood door jamb – Unit 136	9.1
2155	Bedroom #3 ceiling – Unit 136	1.0
2156	Bathroom door frame – Unit 136	4.4

Assay #	Sample Description & Location	Lead Content (mg/cm²)
2157	Bathroom wall wood trim – Unit 136	2.9
2166	Kitchen entry frame – Unit 136	3.6
2172	Kitchen window frame – Unit 136	2.9
2173	Kitchen window sill – Unit 136	2.4
2174	Kitchen window apron – Unit 136	2.7
2186	Front porch metal post – Unit 140	8.5
2187	Front porch vinyl covered wood header – Unit 140	9.6
2188	Front porch exterior wood door jamb – Unit 140	9.0
2203	Living room ceiling – Unit 140	1.1
2204	Kitchen entry frame – Unit 140	2.5
2205	Kitchen pantry frame – Unit 140	2.2
2211	Kitchen door frame – Unit 140	2.0
2212	Rear entrance exterior wood door jamb – Unit 140	10.5
2214	Kitchen window frame – Unit 140	1.8
2215	Kitchen window sill – Unit 140	2.4
2216	Kitchen window apron – Unit 140	2.1
2218	Pantry ½-wall frame – Unit 140	2.3
2219	Pantry ½-wall jamb – Unit 140	3.6
2222	Stairwell ½-wall cap – Unit 140	1.6
2223	Stairwell ½-wall end – Unit 140	3.1
2225	Stairwell riser– Unit 140	3.0
2226	Stairwell stringer – Unit 140	4.4
2227	Stairwell handrail – Unit 140	5.5
2230	Bathroom door frame – Unit 140	2.7
2231	Bathroom wall wood trim – Unit 140	1.8
2232	Bathroom wall A below trim – Unit 140	2.2
2237	Bathroom ceiling – Unit 140	1.5
2251	Bedroom (Room #4) ceiling – Unit 140	1.0
2262	Bedroom (Room #5) ceiling – Unit 140	1.3
2264	2nd story stairwell ½-wall end – Unit 140	2.4
2273	Hallway ceiling – Unit 140	1.4
2274	Front porch metal post – Unit 155	11.5
2275	Front porch vinyl covered wood header – Unit 155	11.8
2276	Front porch concrete threshold – Unit 155	1.2

Assay #	Sample Description & Location	Lead Content (mg/cm²)
2278	Front porch exterior wood door jamb – Unit 155	8.3
2280	Stairwell riser– Unit 155	2.0
2281	Stairwell stringer – Unit 155	2.0
2282	Stairwell handrail – Unit 155	2.8
2085	2nd story stairwell ½-wall end – Unit 155	3.2
2298	Living room ceiling – Unit 155	1.1
2299	Kitchen entry frame – Unit 155	5.0
2302	Kitchen pantry frame – Unit 155	2.2
2303	Kitchen pantry jamb – Unit 155	3.6
2306	Kitchen pantry wall C frame – Unit 155	2.6
2307	Kitchen window frame – Unit 155	4.8
2308	Kitchen window sill – Unit 155	3.1
2309	Kitchen window apron – Unit 155	3.4
2314	Kitchen ceiling – Unit 155	1.2
2328	Bathroom door frame – Unit 155	3.2
2329	Bathroom wall wood trim – Unit 155	3.6
2330	Bathroom wall A above trim – Unit 155	1.3
2331	Bathroom wall B below trim – Unit 155	1.5
2333	Bathroom wall C below trim – Unit 155	2.0
2334	Bathroom wall D – Unit 155	1.2
2335	Bathroom wall D header – Unit 155	1.5
2336	Bathroom ceiling – Unit 155	1.2
2349	Front porch metal post – Unit 164	13.4
2350	Front porch vinyl covered wood header – Unit 164	9.8
2353	Front porch exterior door jamb – Unit 164	9.5
2359	Living room wall B header – Unit 164	1.5
2368	Living room ceiling – Unit 164	1.5
2369	Kitchen entry frame – Unit 164	2.0
2371	Kitchen pantry frame – Unit 164	2.2
2372	Kitchen pantry jamb – Unit 164	2.1
2375	Kitchen wall B header – Unit 164	1.2
2376	Kitchen door frame – Unit 164	2.1
2378	Kitchen window frame – Unit 164	1.2
2379	Kitchen window sill – Unit 164	2.2

Assay #	Sample Description & Location	Lead Content (mg/cm²)
2380	Kitchen window apron – Unit 164	3.6
2383	Kitchen ceiling – Unit 164	1.4
2395	Bedroom (Room #3) ceiling – Unit 164	1.1
2397	Bathroom door frame – Unit 164	3.2
2399	Bathroom wall wood trim – Unit 164	3.7
2400	Bathroom wall A above trim – Unit 164	1.7
2401	Bathroom wall B below trim – Unit 164	1.7
2405	Bathroom wall D header – Unit 164	1.4
2406	Bathroom ceiling – Unit 164	2.0
2417	Hallway ceiling – Unit 164	1.4
2419	Front porch metal post – Unit 165	17.0
2420	Front porch vinyl covered wood header – Unit 165	11.5
2421	Front porch exterior door jamb – Unit 165	3.0
2440	Kitchen entry frame – Unit 165	3.0
2444	Kitchen pantry frame – Unit 165	3.7
2445	Kitchen pantry jamb – Unit 165	2.0
2446	Kitchen door frame – Unit 165	1.9
2447	Kitchen window frame – Unit 165	2.7
2448	Kitchen window sill – Unit 165	2.6
2449	Kitchen window apron – Unit 165	2.5
2453	Kitchen ceiling – Unit 165	1.1
2454	Stairwell ½-wall cap – Unit 165	2.7
2455	Stairwell ½-wall end – Unit 165	3.1
2457	Stairwell riser– Unit 165	2.6
2458	Stairwell stringer – Unit 165	3.4
2459	Stairwell handrail – Unit 165	4.5
2466	Bedroom (Room #3) header – Unit 165	1.1
2485	Bathroom door frame – Unit 165	3.2
2486	Bathroom wall wood trim – Unit 165	2.1
2487	Bathroom wall A above trim – Unit 165	1.1
2488	Bathroom wall B below trim – Unit 165	1.3
2490	Bathroom wall C header – Unit 165	1.2
2491	Bathroom wall D below trim – Unit 165	1.5
2492	Bathroom ceiling – Unit 165	2.1

Assay #	Sample Description & Location	Lead Content (mg/cm²)
2502	2nd story stairwell ½-wall cap – Unit 165	1.2
2503	2nd story stairwell ½-wall end – Unit 165	1.1
2505	Hallway ceiling – Unit 165	1.1
2506	Front porch metal post – Unit 169	13.0
2507	Front porch vinyl covered wood header – Unit 169	9.1
2510	Front porch exterior door jamb – Unit 169	92.2
2527	Kitchen entry frame – Unit 169	2.8
2531	Kitchen window frame – Unit 169	2.9
2532	Kitchen window sill – Unit 169	2.5
2533	Kitchen window apron – Unit 169	11.9
2535	Kitchen door frame – Unit 169	3.1
2536	Kitchen exterior door jamb – Unit 169	7.6
2539	Kitchen pantry frame – Unit 169	2.0
2540	Kitchen pantry jamb – Unit 169	2.7
2544	Bathroom door frame – Unit 169	4.2
2546	Bathroom wall wood trim – Unit 169	4.0
2547	Bathroom wall A below trim – Unit 169	2.3
2549	Bathroom wall B – Unit 169	1.1
2550	Bathroom wall B header – Unit 169	2.0
2551	Bathroom wall C above trim – Unit 169	1.5
2552	Bathroom wall D below trim – Unit 169	2.2
2554	Bathroom ceiling – Unit 169	2.4
2558	Bedroom (Room #4) A wall – Unit 169	1.0
2579	Hallway ceiling – Unit 169	1.1
2580	Front porch metal post – Unit 171	15.5
2581	Front porch vinyl covered wood header – Unit 171	11.1
2582	Front porch exterior door jamb – Unit 171	9.5
2585	Stairwell riser– Unit 171	2.2
2586	Stairwell stringer – Unit 171	1.0
2587	Stairwell handrail – Unit 171	4.3
3005	Stairwell ½-wall end – Unit 171	4.6
3006	Kitchen entry frame – Unit 171	4.7
3009	Kitchen wall B pantry frame – Unit 171	3.2
3010	Kitchen wall B pantry jamb – Unit 171	3.9

Assay #	Sample Description & Location	Lead Content (mg/cm²)
3012	Kitchen wall C pantry frame – Unit 171	2.5
3013	Kitchen window frame – Unit 171	3.5
3012a	Kitchen window sill – Unit 171	2.1
3013a	Kitchen window apron – Unit 171	3.1
3031	Bathroom door frame – Unit 171	3.2
3034	Bathroom wall B – Unit 171	1.7
3035	Bathroom wall B wood trim – Unit 171	3.3
3041	Bathroom ceiling – Unit 171	1.8
3051	Front porch metal post – Unit 191	15.5
3052	Front porch vinyl covered wood header – Unit 191	10.0
3055	Front porch exterior door jamb – Unit 191	2.7
3069	Bathroom door frame – Unit 191	3.4
3070	Bathroom wall A wood trim – Unit 191	4.0
3072	Bathroom wall B below trim – Unit 191	3.0
3074	Bathroom wall B header – Unit 191	3.6
3076	Bathroom wall D below trim – Unit 191	2.9
3077	Bathroom ceiling – Unit 191	4.3
3090	Kitchen entry frame – Unit 191	1.7
3098	Kitchen window frame – Unit 191	3.5
3096	Kitchen window sill – Unit 191	4.3
3097	Kitchen window apron – Unit 191	3.3
3031	Kitchen door frame – Unit 191	4.4
3102	Kitchen wall D pantry frame – Unit 191	4.7
3103	Kitchen wall D pantry jamb – Unit 191	3.0
3115	Front porch exterior door jamb – Unit 192	8.9
3118	Stairwell riser– Unit 192	3.0
3119	Stairwell stringer – Unit 192	3.2
3120	Stairwell handrail – Unit 192	5.4
3121	Stairwell ½-wall cap – Unit 192	2.5
3122	Stairwell ½-wall end – Unit 192	4.4
3136	Bathroom door frame – Unit 192	3.7
3137	Bathroom wall A wood trim – Unit 192	2.4
3138	Bathroom wall A below trim – Unit 192	1.5
3139	Bathroom wall B – Unit 192	1.3

Assay #	Sample Description & Location	Lead Content (mg/cm²)
3140	Bathroom wall B header – Unit 192	2.1
3141	Bathroom wall C – Unit 192	1.8
3142	Bathroom wall D – Unit 192	2.5
3144	Bathroom ceiling – Unit 192	2.6
3162	Kitchen window frame – Unit 192	4.0
3163	Kitchen window sill – Unit 192	4.6
3164	Kitchen window apron – Unit 192	4.4
3166	Kitchen wall C pantry frame – Unit 192	3.0
3168	Kitchen wall D pantry frame – Unit 192	3.8
3182	Front porch metal post – Unit 194	11.8
3183	Front porch vinyl covered wood header – Unit 194	7.2
3185	Front porch exterior door jamb – Unit 194	9.0
3199	Kitchen entry frame – Unit 194	4.4
3202	Kitchen wall D pantry frame – Unit 194	3.7
3203	Kitchen wall D pantry jamb – Unit 194	3.9
3206	Kitchen door frame – Unit 194	5.5
3207	Kitchen window frame – Unit 194	4.6
3208	Kitchen window sill – Unit 194	2.4
3209	Kitchen window apron – Unit 194	3.4
3226	Bedroom ceiling – Unit 194	1.2
3227	Bathroom door frame – Unit 194	2.8
3228	Bathroom wall A wood trim – Unit 194	3.6
3229	Bathroom wall A below trim – Unit 194	3.8
3230	Bathroom wall B – Unit 194	1.8
3231	Bathroom wall B header – Unit 194	4.8
3232	Bathroom wall C – Unit 194	1.7
3233	Bathroom wall D – Unit 194	3.2
3234	Bathroom ceiling – Unit 194	3.2
3246	Front Porch porch post – Unit 201	6.5
3247	Front Porch support beam – Unit 201	12.7
3251	Stairwell stair riser – Unit 201	2.2
3252	Stairwell stair stringer – Unit 201	3.1
3253	Stairwell handrail – Unit 201	2.7
3258	Stairwell Upper half-wall cap top – Unit 201	2.0

Assay #	Sample Description & Location	Lead Content (mg/cm²)
3259	Stairwell half-wall cap end – Unit 201	2.6
3273	Kitchen entry frame – Unit 201	3.3
3277	Kitchen pantry frame – Unit 201	2.9
3278	Kitchen window #1 frame – Unit 201	1.9
3279	Kitchen window #1 sill – Unit 201	2.0
3280	Kitchen window #1 apron – Unit 201	3.1
3298	Bathroom door trim – Unit 201	2.4
3300	Bathroom Wall A wall trim – Unit 201	4.1
3301	Bathroom Wall A wall below trim – Unit 201	1.8
3302	Bathroom Wall B wall above trim – Unit 201	2.5
3303	Bathroom Wall C wall above trim – Unit 201	2.3
3304	Bathroom Wall D wall – Unit 201	1.8
3305	Bathroom Wall D header – Unit 201	2.8
3306	Bathroom ceiling – Unit 201	2.4
3318	Exterior post – Unit 203	13.9
3319	Exterior support beam – Unit 203	10.0
3322	Exterior jamb – Unit 203	11.1
3339	Kitchen pantry frame – Unit 203	1.7
3340	Kitchen pantry jamb – Unit 203	3.4
3342	Kitchen door frame – Unit 203	2.3
3344	Kitchen exterior door jamb – Unit 203	9.5
3346	Kitchen Wall C window frame – Unit 203	3.9
3347	Kitchen Wall C window sill – Unit 203	3.7
3348	Kitchen Wall C window apron – Unit 203	2.4
3349	Kitchen Wall C header – Unit 203	1.2
3353	Stairwell half-wall cap top – Unit 203	2.9
3354	Stairwell half-wall cap end – Unit 203	2.5
3356	Stairwell stair riser – Unit 203	4.0
3357	Stairwell stair stringer – Unit 203	5.0
3358	Stairwell handrail – Unit 203	10.6
3363	Stairwell upstairs half-wall end – Unit 203	1.8
3389	Bathroom Wall A door trim – Unit 203	2.6
3391	Bathroom Wall A wall trim – Unit 203	3.5
3392	Bathroom Wall A wall below trim – Unit 203	2.6

Assay #	Sample Description & Location	Lead Content (mg/cm²)
3393	Bathroom Wall B wall above trim – Unit 203	1.9
3395	Bathroom Wall C header – Unit 203	2.0
3396	Bathroom Wall C wall – Unit 203	1.9
3397	Bathroom Wall D wall below trim – Unit 203	2.1
3398	Bathroom ceiling – Unit 203	2.0
3413	Front Porch post – Unit 209	10.1
3414	Front porch support beam – Unit 209	8.7
3415	Front porch exterior door jamb – Unit 209	9.0
3434	Kitchen Wall B window frame – Unit 209	4.6
3435	Kitchen Wall B window sill – Unit 209	4.2
3436	Kitchen Wall B window apron – Unit 209	4.9
3441	Bathroom Wall A door frame – Unit 209	3.6
3442	Bathroom Wall A wall trim – Unit 209	1.3
3445	Bathroom Wall B wall trim – Unit 209	1.3
3447	Bathroom Wall B wall above trim – Unit 209	1.4
3451	Bathroom ceiling – Unit 209	1.3
3491	Exterior porch column – Unit 220	12.2
3492	Exterior porch support – Unit 220	8.2
3495	Exterior porch door jamb – Unit 220	7.4
3497	Stairwell stair riser – Unit 220	1.6
3498	Stairwell stair stringer – Unit 220	2.8
3499	Stairwell handrail – Unit 220	3.4
3503	Stairwell half-wall cap top – Unit 220	1.1
3512	Living Room header – Unit 220	1.2
3517	Living Room ceiling – Unit 220	1.0
3518	Kitchen Wall A entry frame – Unit 220	2.3
3522	Kitchen Wall C window #1 frame – Unit 220	2.7
3523	Kitchen Wall C window #1 sill – Unit 220	1.5
3524	Kitchen Wall C window #1 apron – Unit 220	3.1
3527	Kitchen Wall C pantry frame – Unit 220	1.6
3529	Kitchen Wall D pantry frame – Unit 220	1.4
3531	Kitchen ceiling – Unit 220	1.3
3532	Bathroom Wall A door frame – Unit 220	2.8
3533	Bathroom Wall A wall trim – Unit 220	4.1

Assay #	Sample Description & Location	Lead Content (mg/cm²)
3535	Bathroom Wall A wall below trim – Unit 220	2.0
3536	Bathroom Wall B header – Unit 220	3.2
3538	Bathroom Wall C wall above trim – Unit 220	1.3
3539	Bathroom Wall D wall below trim – Unit 220	2.5
3540	Bathroom Wall D baseboard – Unit 220	1.1
3541	Bathroom ceiling – Unit 220	3.1
3553	Bedroom (Room 4) ceiling support beam – Unit 220	1.2
3554	Bedroom (Room 4) ceiling – Unit 220	1.5
3565	Exterior Porch post – Unit 239	16.2
3566	Exterior Porch support – Unit 239	14.9
3569	Exterior door jamb – Unit 239	9.3
3570	Exterior door frame – Unit 239	6.8
3585	Kitchen Wall B window frame – Unit 239	3.3
3587	Kitchen Wall B window apron – Unit 239	2.7
3592	Bathroom Wall A door frame – Unit 239	3.5
3593	Bathroom Wall A door trim – Unit 239	1.5
3636	Porch post – Unit 243	10.8
3637	Porch support beam – Unit 243	8.9
3638	Porch frame – Unit 243	2.9
3641	Exterior door jamb – Unit 243	8.3
3662	Kitchen Wall B window frame – Unit 243	4.9
3663	Kitchen Wall B window sill – Unit 243	3.0
3664	Kitchen Wall B window apron – Unit 243	3.6
3670	Bathroom Wall A door trim – Unit 243	2.7
3671	Bathroom Wall A wall trim – Unit 243	4.2
3714	Front Porch post – Unit 051	13.7
3715	Front Porch support beam – Unit 051	4.2
3720	Front Porch exterior door jamb – Unit 051	8.9
3737	Kitchen Wall A entry frame – Unit 051	4.5
3746	Kitchen Wall C door frame – Unit 051	4.1
3748	Kitchen Wall C window frame – Unit 051	2.9
3749	Kitchen Wall C window sill – Unit 051	2.0
3750	Kitchen Wall C window apron – Unit 051	3.1
3756	Stairwell half-wall cap top – Unit 051	1.3

Assay #	Sample Description & Location	Lead Content (mg/cm²)
3757	Stairwell half-wall cap end – Unit 051	1.8
3759	Stairwell stair riser – Unit 051	2.5
3760	Stairwell stair stringer – Unit 051	2.4
3761	Stairwell handrail – Unit 051	8.1
3794	Bathroom Wall A door frame – Unit 051	2.9
3796	Bathroom Wall A wall trim – Unit 051	1.2
3804	Bathroom ceiling – Unit 051	1.7
3805	Hallway half-wall cap top – Unit 051	1.6
3806	Hallway half-wall cap end – Unit 051	3.3
3821	Front Porch post – Unit 157	1.4
3822	Front Porch support beam – Unit 157	16.9
3825	Front Porch exterior door jamb – Unit 157	7.7
3841	Bathroom Wall A door frame – Unit 157	2.2
3842	Bathroom Wall A wall trim – Unit 157	2.9
3843	Bathroom Wall A wall below trim – Unit 157	1.1
3848	Bathroom ceiling – Unit 157	1.7
3866	Kitchen Wall A entry frame – Unit 157	4.2
3872	Kitchen Wall C window frame – Unit 157	3.9
3873	Kitchen Wall C window sill – Unit 157	2.9
3874	Kitchen Wall C window apron – Unit 157	2.6
3876	Kitchen Wall C door frame – Unit 157	5.5
3878	Kitchen Wall C exterior door jamb – Unit 157	9.1
3880	Kitchen pantry frame – Unit 157	1.9
3854	Kitchen ceiling – Unit 157	1.2
3885	Front Porch post – Unit 007	9.8
3886	Front Porch support beam – Unit 007	7.4
3887	Front Porch door frame – Unit 007	5.8
3890	Front Porch exterior door jamb – Unit 007	8.0
3907	Kitchen Wall A door frame – Unit 007	2.2
3913	Kitchen Wall C window frame – Unit 007	2.8
3914	Kitchen Wall C window sill – Unit 007	2.4
3915	Kitchen Wall C window apron – Unit 007	3.0
3916	Kitchen Wall C back door frame – Unit 007	1.6
3919	Kitchen Wall C back door jamb – Unit 007	5.8

Assay #	Sample Description & Location	Lead Content (mg/cm²)
3922	Kitchen Wall D pantry jamb – Unit 007	1.0
3927	Kitchen ceiling – Unit 007	1.1
3931	Stairwell stair riser – Unit 007	1.3
3932	Stairwell stair stringer – Unit 007	2.0
3933	Stairwell handrail – Unit 007	10.5
3935	Bathroom Wall A door frame – Unit 007	1.9
3936	Bathroom Wall A trim – Unit 007	2.1
3937	Bathroom Wall A wall below trim – Unit 007	1.7
3938	Bathroom Wall B wall below trim – Unit 007	1.0
3944	Bathroom ceiling – Unit 007	1.5
3960	Back Bedroom ceiling – Unit 007	1.2
3974	Upstairs Hallway half-wall cap – Unit 007	1.4
3975	Upstairs Hallway half-wall end – Unit 007	2.9
3986	Porch post – Unit 033	2.9
3987	Porch support beam – Unit 033	9.1
3990	Porch exterior jamb – Unit 033	9.0
3994	Stairwell handrail – Unit 033	2.4
3998	Stairwell half-wall cap – Unit 033	4.1
4000	Porch post – Unit 068	14.6
4001	Porch header – Unit 068	11.2
4005	Porch jamb – Unit 068	13.5
4023	Kitchen entry frame – Unit 068	2.3
4024	Kitchen Wall A pantry frame – Unit 068	1.6
4031	Kitchen Wall C window frame – Unit 068	3.8
4032	Kitchen Wall C window sill – Unit 068	3.2
4033	Kitchen Wall C window apron – Unit 068	2.6
4034	Kitchen Wall C door frame – Unit 068	3.4
4038	Stairwell half-wall cap – Unit 068	1.6
4039	Stairwell half-wall end – Unit 068	1.8
4040	Stairwell stair tread – Unit 068	1.1
4041	Stairwell stair riser – Unit 068	2.8
4042	Stairwell stair stringer – Unit 068	2.4
4043	Stairwell handrail – Unit 068	4.4
4045	Bathroom Wall A door frame – Unit 068	1.9

Assay #	Sample Description & Location	Lead Content (mg/cm²)
4046	Bathroom Wall A wall above trim – Unit 068	1.2
4047	Bathroom Wall B wall below trim – Unit 068	1.4
4048	Bathroom Wall B wall trim – Unit 068	1.8
4052	Bathroom Wall D wall below trim – Unit 068	1.0
4053	Bathroom ceiling – Unit 068	1.4
4068	Back Bedroom ceiling – Unit 068	1.3
4082	Front Bedroom ceiling – Unit 068	1.2
4085	Upstairs Hallway half-wall cap – Unit 068	1.2
4086	Upstairs Hallway half-wall end – Unit 068	2.5
4095	Porch post – Unit 004	13.4
4096	Porch header – Unit 004	10.3
4097	Porch door frame – Unit 004	8.9
4098	Porch exterior door jamb – Unit 004	9.8
4117	Kitchen entry frame – Unit 004	3.2
4120	Kitchen Wall B pantry frame – Unit 004	4.9
4121	Kitchen Wall B jamb – Unit 004	2.7
4123	Kitchen Wall C door frame – Unit 004	1.9
4124	Kitchen Wall C window frame – Unit 004	4.0
4125	Kitchen Wall C window sill – Unit 004	2.9
4126	Kitchen Wall C window apron – Unit 004	3.0
4132	Stairwell half-wall end – Unit 004	2.2
4135	Stairwell stair riser – Unit 004	2.6
4136	Stairwell stair stringer – Unit 004	3.2
4137	Stairwell handrail – Unit 004	8.8
4170	Bathroom Wall A door frame – Unit 004	1.9
4172	Bathroom Wall A wall trim – Unit 004	1.3
4178	Bathroom ceiling – Unit 004	1.3
4179	Bathroom Wall D wall below trim – Unit 004	1.0
4182	Hallway half-wall end – Unit 004	2.0
4191	Porch post – Unit 007	14.1
4192	Porch header – Unit 007	9.7
4193	Porch door frame – Unit 007	9.0
4196	Porch exterior jamb – Unit 007	9.1
4213	Kitchen entry frame – Unit 007	2.6

Assay #	Sample Description & Location	Lead Content (mg/cm²)
4220	Kitchen Wall C window frame – Unit 007	2.9
4221	Kitchen Wall C window sill – Unit 007	3.2
4222	Kitchen Wall C window apron – Unit 007	2.5
4223	Kitchen Wall C door frame – Unit 007	2.0
4227	Kitchen Wall D shelf support – Unit 007	2.7
4234	Stairwell stair riser – Unit 007	1.7
4235	Stairwell stair stringer – Unit 007	2.4
4236	Stairwell handrail – Unit 007	7.2
4237	Bathroom Wall A door frame – Unit 007	2.3
4239	Bathroom Wall A wall trim – Unit 007	1.6
4240	Bathroom Wall A wall below trim – Unit 007	1.0
4241	Bathroom Wall B wall below trim – Unit 007	1.0
4243	Bathroom Wall D wall – Unit 007	1.3
4244	Bathroom ceiling – Unit 007	1.8
4250	Back Bedroom Wall B header – Unit 007	1.1
4269	Front Bedroom Wall C header – Unit 007	1.2
4274	Front Bedroom ceiling – Unit 007	1.3
4277	Hallway upstairs half-wall cap – Unit 007	1.5
4279	Hallway upstairs half-wall end – Unit 007	3.1
4287	Hallway upstairs ceiling – Unit 007	1.3
4288	Porch post – Unit 011	3.8
4290	Porch header beam – Unit 011	6.8
4291	Porch door frame – Unit 011	2.2
4293	Porch exterior jamb – Unit 011	9.6
4308	Kitchen entry frame – Unit 011	3.3
4311	Kitchen Wall A pantry jamb – Unit 011	1.7
4314	Kitchen Wall B pantry frame – Unit 011	2.9
4315	Kitchen Wall C – Unit 011	2.4
4317	Kitchen Wall C window frame – Unit 011	4.0
4318	Kitchen Wall C window sill – Unit 011	2.6
4319	Kitchen Wall C window apron – Unit 011	2.4
4332	Bedroom (Room 3) header – Unit 011	1.0
4340	Bathroom Wall A door frame – Unit 011	1.8
4342	Bathroom Wall A wall trim – Unit 011	4.2

Assay #	Sample Description & Location	Lead Content (mg/cm²)
4344	Bathroom Wall B wall below trim – Unit 011	1.9
4348	Bathroom ceiling – Unit 011	1.0
4358	Hall ceiling – Unit 011	1.2
4359	Porch post – Unit 020	12.7
4361	Porch header – Unit 020	8.1
4362	Porch door frame – Unit 020	5.8
4364	Porch exterior jamb – Unit 020	8.9
4367	Stairwell stair riser – Unit 020	2.0
4368	Stairwell stair stringer – Unit 020	2.8
4369	Stairwell handrail – Unit 020	3.2
4386	Kitchen Wall B pantry frame – Unit 020	3.1
4387	Kitchen Wall B frame – Unit 020	1.8
4392	Kitchen Wall C window frame (2) – Unit 020	5.2
4393	Kitchen Wall C window sill – Unit 020	2.5
4394	Kitchen Wall C window apron – Unit 020	4.4
4410	Bedroom (Room 4) ceiling beam – Unit 020	1.2
4412	Bathroom Wall A door frame – Unit 020	2.0
4414	Bathroom Wall A wall trim – Unit 020	1.8
4415	Bathroom Wall A wall below trim – Unit 020	1.0
4416	Bathroom Wall B wall – Unit 020	1.3
4421	Bathroom header – Unit 020	1.3
4435	Porch post – Unit 049	13.1
4436	Porch header – Unit 049	6.9
4438	Porch exterior jamb – Unit 049	9.2
4452	Living room ceiling – Unit 049	1.1
4453	Kitchen entry frame – Unit 049	3.2
4457	Kitchen Wall B pantry frame – Unit 049	4.0
4461	Kitchen Wall C pantry frame – Unit 049	3.2
4462	Kitchen Wall C window frame – Unit 049	4.1
4463	Kitchen Wall C window sill – Unit 049	2.6
4464	Kitchen Wall C window apron – Unit 049	3.3
4482	Bathroom Wall A door trim – Unit 049	3.0
4484	Bathroom Wall A wall trim – Unit 049	3.5
4485	Bathroom Wall A wall below trim – Unit 049	1.5

Assay #	Sample Description & Location	Lead Content (mg/cm²)
4486	Bathroom Wall B wall below trim – Unit 049	1.3
4487	Bathroom Wall C wall – Unit 049	1.0
4489	Bathroom header – Unit 049	1.1
4490	Bathroom ceiling – Unit 049	1.6
4503	Porch post – Unit 108	13.9
4504	Porch header – Unit 108	13.2
4505	Porch exterior jamb – Unit 108	2.6
4519	Kitchen entry frame – Unit 108	2.1
4527	Kitchen Wall C window frame – Unit 108	3.3
4529	Kitchen Wall C window apron – Unit 108	1.9
4530	Kitchen Wall C door frame – Unit 108	1.5
4534	Stairwell half-wall cap – Unit 108	2.0
4535	Stairwell half-wall end – Unit 108	2.1
4537	Stairwell stair riser – Unit 108	3.0
4538	Stairwell stair stringer – Unit 108	3.2
4540	Bathroom Wall A door frame – Unit 108	2.0
4541	Bathroom Wall A wall trim – Unit 108	2.5
4575	Hallway upstairs half-wall cap – Unit 108	2.0
4576	Hallway upstairs half-wall end – Unit 108	2.5
4586	Porch post – Unit 198	12.6
4587	Porch header – Unit 198	11.0
4590	Porch exterior jamb – Unit 198	7.8
4610	Kitchen Wall C window frame – Unit 198	4.8
4611	Kitchen Wall C window sill – Unit 198	4.9
4612	Kitchen Wall C window apron – Unit 198	3.4
4613	Kitchen Wall C door frame – Unit 198	3.3
4614	Kitchen Wall D pantry door frame – Unit 198	4.2
4615	Kitchen Wall D half-wall jamb – Unit 198	5.3
4618	Stairwell half-wall cap – Unit 198	3.6
4619	Stairwell half-wall end – Unit 198	2.1
4621	Stairwell stair riser – Unit 198	4.1
4622	Stairwell stair stringer – Unit 198	3.8
4623	Stairwell handrail – Unit 198	2.4
4625	Bathroom Wall A door frame – Unit 198	3.8

Assay #	Sample Description & Location	Lead Content (mg/cm²)
4627	Bathroom Wall A wall trim – Unit 198	2.7
4628	Bathroom Wall A wall below trim – Unit 198	2.5
4629	Bathroom Wall B wall – Unit 198	2.0
4631	Bathroom Wall C header – Unit 198	2.1
4632	Bathroom Wall D wall – Unit 198	2.8
4633	Bathroom ceiling – Unit 198	3.2
4663	Hallway upstairs half-wall cap – Unit 198	1.5
4664	Hallway upstairs half-wall end – Unit 198	2.7

mg/cm² = milligrams per square centimeter

Note: Values exceeding the TDEC/HUD/EPA lead-based paint standard of 1.0 mg/cm²

1950s Apartments - Section 304

Positive Lead-Based Paint Locations

Unit #	Door Trim Frame	Porch Jamb	Interior Door Jamb	Half-Wall Cap	Half-Wall End	Stairwell	Closet Rod	Closet Shelf Support	Porch Rail	Living Room Wall	Kitchen Pantry Shelf	Closet Shelf	Bathroom Wall Trim	Bedroom Wall	Bedroom Beam
276						x									
302	x														
310						x									
315						na									
324	x	x		x	x	x	3, 4, 5, 6	#3							
371						na	x	#1							
467	x	x				x	x								
245						na									
251						x	BR & hall								
258				x	x	x									
261	x	x	LR			x	3, 4		x	x					
259	x	x		x	x	x	BR & hall								
266	x	x		x	x	x	5				x				
272						na	LR, BR 5 & 6								
273						x	BR								
279						na	BR								
284	x	x		x	x	x	LR, BR 2					LR			
295	x														
298				x	x	x									
301	x					na	BR								
302	x	x		x	x	x	hall								
309						na	BR								
316						x	BR								
323	x	x				na									
329						x	BR 2								
332						na	BR 3								
343	x	x				na	BR 2								
384						na	BR 2, LR								
410						x									
462	x					na	BR2 & 3								
348	x	x				na									
352	x	x				x	LR, BR 4 & 5								
353						x	BR								
359	x					x									
362	x					x									
364	x	x				x	BR								
365	x					x									
395	x					na	BR								
396	x	x		x	x	x	BR, hall								
389	x	x		x	x	x	BR, hall								
399						x	BR 1 & 2								
402	x					x							x		
407		x				x									
408						x		BR #2				BR 2	x		
446	x					x									
452						x	BR 5							x	x
453						x	BR 4 & 5					BR 4			
455						x	BR 1								
468	x					na									
296		x				na	hall								
376	x					na	BR 1								

BR = Bedroom LR = Living Room BA = Bathroom K = Kitchen
na = not applicable (no stairway)