



November 24, 2021

Mr. Adam Dutter, Project Manager  
**Ojai Unified School District**  
414 East Ojai Avenue  
Ojai, CA 93023

**Subject: Exterior Lead-Based Paint Survey**  
San Antonio Elementary School  
650 Carne Road  
Ojai, CA 93023  
*FCG Job Code: OUSD-63*

Dear Mr. Dutter:

FCG Environmental (FCG) performed an exterior lead-based paint survey at the San Antonio Elementary School campus in Ojai, California. The investigation was conducted by FCG personnel on September 14, 2021, under the supervision of Alan Forbess, a CA Lead Inspector/Assessor and Project Monitor (No. 505/504). This report documents the results of our survey, which was conducted to identify proper handling of hazardous building materials prior to renovation work.

## 1.0 Background Information / Scope of Project

**Background/Site Description:** The buildings on the San Antonio Elementary School campus are scheduled for new exterior paint. The five structures included in the survey are the Main Building, Restroom Building, Classroom Building 3 – 4, Classroom Building 5 – 6 and Classroom Building 7 – 10.

**Scope of Project:** FCG was asked to conduct a lead survey of relevant building materials and components in order to identify hazardous materials concerns in accordance with federal, state and local regulations. The following services were conducted in order to define lead concerns:

- A visual inspection of representative building materials was conducted to identify suspect lead-based materials in the areas of exterior renovations.
- The survey for lead-based paint was conducted using an X-Ray Fluorescence (XRF) paint analyzer to screen representative surfaces and materials suspected of being coated with lead-based paint.
- All field observations and XRF readings and other findings have been evaluated, with this written report summarizing our findings and providing recommendations as necessary.

## 2.0 Exterior Lead-Based Paint Survey

FCG was contracted to perform a survey in order to determine the presence of lead-based paint and components within the exterior areas of the subject site buildings. Screening for lead was conducted in the field using XRF methodology in accordance with current state and federal

regulations. All field work was conducted by a CA Certified Lead Sampling Technician. The results of this survey will be used by contracting personnel to determine appropriate lead safe work practices prior to painting/renovation work.

**Background Information on Lead Paint Requirements:** Several regulations apply to the disturbance and possible exposure to lead from paints and other coatings. Title 17 of the California Code of Regulations (CCR) applies to residences and buildings accessible to the public that were constructed prior to 1979, and schools constructed before 1993 where lead paint may exist. Cal-OSHA regulations found within Title 8 of the CCR apply to worker exposure as stated in the Lead-in-Construction Standard (8-CCR-1532.1). The EPA recently issued a final rule to address lead-based paint hazards created by renovation, repair and painting activities that disturb lead-based paint in target housing and child-occupied facilities.

The EPA's Lead Renovation, Repair and Painting (RRP) Program was passed into regulation requiring compliance with training and certification requirements per Title 40 of the Code of Federal Regulations (40 CFR Part 745). The RRP rule states that firms and individuals conducting renovations of target housing constructed before 1978 must assume that lead is present in all painted surfaces or coatings unless a written determination has been made by a Certified Inspector that the components affected by the renovation are free of paint or other surface coatings that contain lead equal to or in excess of 1.0 milligrams per square centimeter (mg/cm<sup>2</sup>) or 0.5% by weight.

**Scope of Lead Testing Services:** FCG's scope of services involved field testing through use of X-ray fluorescence (XRF) instrumentation, which provides instantaneous readings in the field. The XRF instrument is used because of its demonstrated abilities to accurately determine the amount of lead that is present without disturbing the painted surfaces, as well as their high speed and relatively low cost per sample. The XRF device is capable of measuring lead in both deteriorated and intact paint. See the Attachments to this report for more information on XRF sampling methodology. Based on the results of our survey using XRF testing methodology, the following is a summary of our lead survey results:

- **Lead Based-Paint (LBP):** We have listed below those painted surfaces with lead concentrations at or above 1.0 milligrams per square centimeter (mg/cm<sup>2</sup>) using XRF equipment and are therefore considered positive for lead-based paint (LBP) per current state and federal regulations:
  - *Brown wood fascia – Building 3-4 (all sides)*
  - *Brown metal windows, frames – Building 3-4 (B, C & D sides)*
  - *Brown wood window trim, sills – Building 3-4 (B, C & D sides)*
  - *Brown wood windows, frames, sills – Main building (all sides)*
  - *Brown wood fascia, eaves & trim (at roof peaks) – Main building (all sides)*
  - *Brown wood door frame, transom & transom frame – Main building (A & B sides)*
  - *Brown wood door frames – Main building entry*
  - *Brown wood windows, frames, casing & sills – Main building*

No LBP was detected on the exteriors of Classroom Building 5-6, Classroom Building 7-10 or the Restroom Building. Refer to the attached data tables for a summary of all XRF readings and the locations of lead-based materials. The A side noted on the tables is the west (Carne Rd. side) of the subject site and the B, C and D sides continue clockwise around the site.

### 3.0 Conclusions & Recommendations

An exterior lead-based paint survey at the subject site has been completed per the terms of our agreement to define hazardous materials issues prior to future site work. Based on our visual observations and our evaluation of analytical and XRF data, we conclude the following:

1. The painted materials listed on Page 2 of this report meet the definition of Lead-Based Paint (LBP) with lead concentrations above the 1.0 mg/cm<sup>2</sup> regulatory level by XRF screening methods. These materials will require the implementation of lead-safe work practices per EPA's Renovation Repair & Painting Rule and CA Title 17 as part of future renovations and painting activities.
2. A site plan of the campus showing the locations of LBP is provided in the attachments section to this report. Please refer to the attached data tables for a complete listing of all XRF Field Readings and a separate table of positive for lead-based paint (LBP), with locations and conditions noted. The A side noted on the site plan and XRF data tables is the west side (Carne Rd.), with the B, C and D sides following in a clockwise direction around the site.
3. It is the responsibility of the contractor conducting LBP disturbance work to protect employees, the general public and prevent contamination of the site when disturbing lead. The contractor must comply with current OSHA regulations and the EPA's Renovation Repair and Painting (RRP) Rule, which requires the use of "lead safe work practices" when disturbing lead. This includes the use of wet methods, proper containment and dust controls during all disturbance work where lead dust may be generated. Proper clean-up using HEPA vacuums and damp wiping methods are also recommended. The use of mechanical means (i.e., sanding, grindings, etc.) to remove paint with detectable levels of lead is not recommended unless the equipment is properly equipped with HEPA exhaust. Please see the attached Lead Safe Work Practices for detailed information on proper work practices and procedures.
4. Lead waste materials should be properly contained and transported for off-site disposal at a properly permitted facility. Lead paint chips and similar lead waste is typically hazardous waste and must be properly manifested and disposed at a Class I landfill. If necessary, waste characterization testing should be conducted to ensure proper handling and disposal.
5. Although many of the painted surfaces tested at the site do not meet the definition of LBP, any material containing *any detectable level of lead* is subject to Cal-OSHA's Construction Lead Standard (Title 8, CCR, Section 1532.1) which states that employers can assume that disturbance of coatings or materials shown to contain less than 600 ppm total lead will not result in exposures above the Action Level (30 ug/m<sup>3</sup> lead in air). It is the responsibility of the employer to ensure that employees are not exposed above the Action Level or Permissible Exposure Limit per OSHA.
6. Please see the attached Lead Safe Work Practices for general recommendations, controls and work practices to be implemented during exterior painting projects where lead-based paint or lead containing paint is present. These work practices are generic

to all projects and should be implemented as needed to protect the site and prevent exposure to workers or others within close proximity of the project work areas.

**General:** As our survey was limited to readily accessible areas within the project scope of work, there is potential that suspect materials previously not included or identified by our survey could be discovered during future site work. This may include suspect materials located inside walls, under floors, above ceilings, etc. Additional suspect asbestos materials may exist but were not sampled or identified as part of this survey. If suspect materials are found during site work, the area should be isolated and any suspect materials tested to confirm or deny the presence of asbestos, lead or other hazards.

### **Limitations Statement**

The data compiled and evaluated as part of this assessment was limited and may not represent all conditions at the subject site. This assessment reflects the data collected from the specific locations tested to identify lead-based paint (LBP) or lead coatings in those locations and may not be all encompassing. There is always potential for lead paint to be missed due to problems with accessibility or limits placed on the scope of the inspection by the client. The presence or absence of lead-based paint or lead-based paint hazards applies only to the tested or assessed surfaces on the date of the field visit. It should be understood that conditions noted within this report were accurate at the time of the inspection and in no way reflect the conditions at the property after the date of the inspection.

All data collection, findings, conclusions and recommendations presented by FCG within this report are based upon limited data using current standard practices accepted within the industry. The conclusions and recommendations presented within this report are based on current regulations and the professional experience of the certified professionals involved in this project.

The data collected during this assessment and any resulting recommendations shall be used only by the client for the site described in this report. Any use or reliance of this report by a third party, including any of its information or recommendations, without the explicit authorization of the client shall be strictly at the risk of the third party.

It should not be misconstrued that this assessment has identified any or all environmental conditions at the subject site. FCG makes no representations regarding the accuracy of the enclosed data and will not be held responsible for any incidental or consequential loss or punitive damages including but not limited to, loss of profits or revenues, loss of use of a facility or land, delay in construction or action of regulatory agencies.

If you have any questions or concerns regarding the information provided, please do not hesitate to call us at 805.646.1995.

### **FCG Environmental**



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Alan Forbes, Principal Consultant  
Certified Lead Inspector/Assessor & Project Monitor (LRC No. 505/504)

- Attachments:
- 1 – Site Plan with LBP noted
  - 2 – XRF Field Readings (All & Positive only) with XRF Sampling Methodology
  - 3 – FCG Inspector Certifications
  - 4 – Lead Safe Work Practices (general)

# Attachment 1


## Site Plan for San Antonio Elementary School (with areas of LBP noted)



B side


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DSA

PROJECT TITLE  
**OJAI UNIFIED SCHOOL DISTRICT**  
  
 SAN ANTONIO ELEMENTARY SCHOOL  
 650 Carne Road  
 Ojai, California 93023

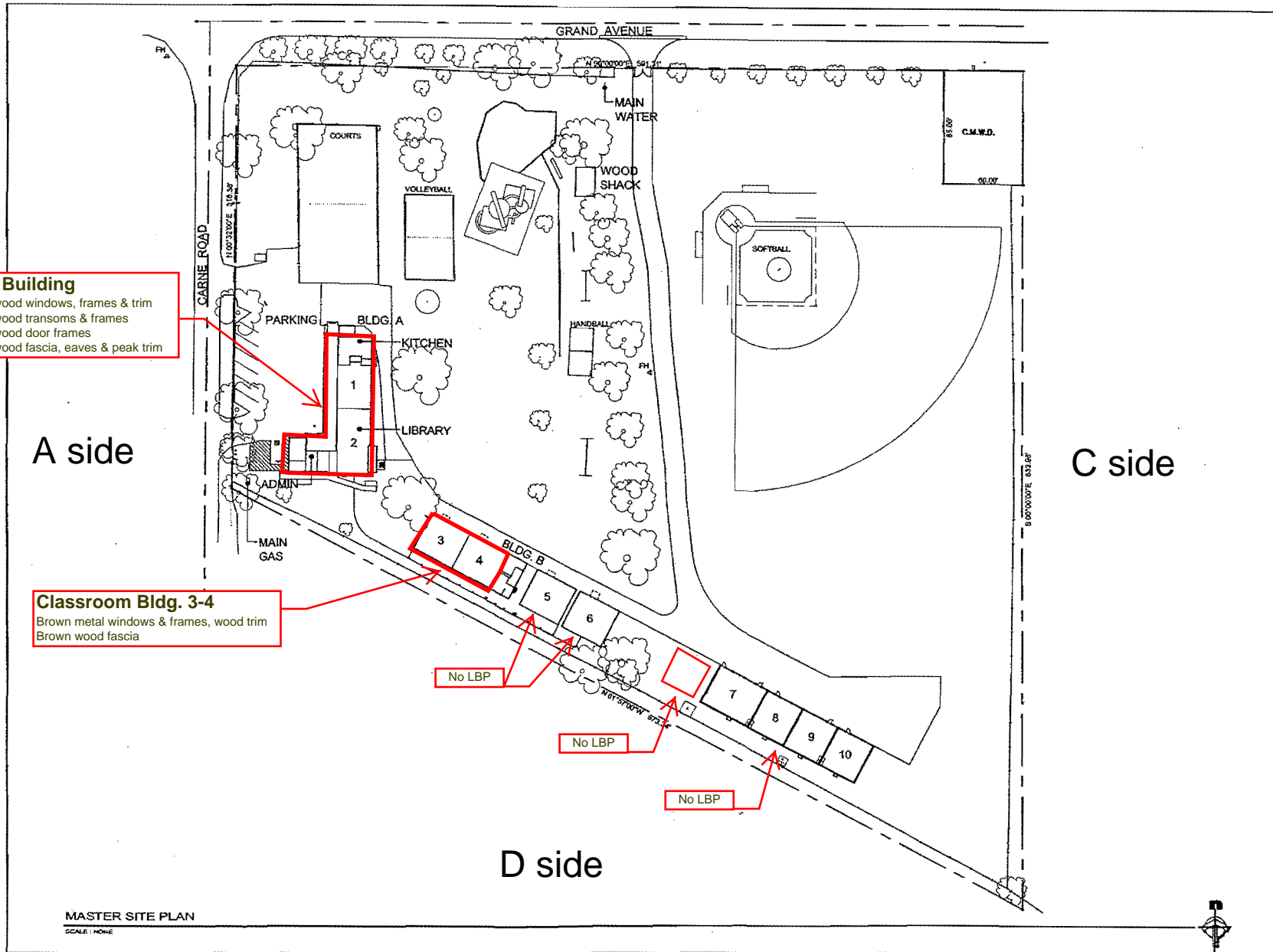
SHEET TITLE  
**MASTER SITE PLAN**

Issue Number	Description	Date

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II	PRINCIPAL ARCHITECT	John Carreno, AIA
VI	DATE	10.24.2022
III	DRAWN BY	CSJ
IV	PROJECT NUMBER	10224
V	CAD FILE	
VI	SCALE	A3 NOTED
VII	SHEET NUMBER	

JAC CONNECTION ARCHITECTURE & PLANNING  
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**Main Building**  
 Brown wood windows, frames & trim  
 Brown wood transoms & frames  
 Brown wood door frames  
 Brown wood fascia, eaves & peak trim

A side

C side

**Classroom Bldg. 3-4**  
 Brown metal windows & frames, wood trim  
 Brown wood fascia

No LBP

No LBP

No LBP

D side

**MASTER SITE PLAN**  
 SCALE: 1"=40'



## Attachment 2

XRF Field Readings from Lead Based Paint Survey  
(All Readings & Positive Readings only)

XRF Sampling Methodology





**Table of Positive XRF Readings for Lead Paint**  
**San Antonio Elementary School**  
**650 Carne Road, Ojai, CA 93023**  
**[A Side = Carne Rd. (west)]**

Component	Substrate	Side	Condition	Color	Area	Misc 1	Results	Lead mg/cm <sup>2</sup>
FASCIA	WOOD	D	POOR	BROWN	OUTSIDE	BLDG 3-4	Positive	4.2
FASCIA	WOOD	D	POOR	BROWN	OUTSIDE	BLDG 3-4	Positive	2.5
FASCIA	WOOD	A	POOR	BROWN	OUTSIDE	BLDG 3-4	Positive	3.3
FASCIA	WOOD	B	POOR	BROWN	OUTSIDE	BLDG 3-4	Positive	2.9
FASCIA	WOOD	C	POOR	BROWN	OUTSIDE	BLDG 3-4	Positive	3.7
WINDOW	METAL	D	FAIR	BROWN	OUTSIDE	BLDG 3-4	Positive	2.9
WINDOW FR	METAL	D	FAIR	BROWN	OUTSIDE	BLDG 3-4	Positive	4.1
WINDOW TR	WOOD	D	FAIR	BROWN	OUTSIDE	BLDG 3-4	Positive	3.2
WINDOW TR	WOOD	C	FAIR	BROWN	OUTSIDE	BLDG 3-4	Positive	5.4
WINDOW FR	METAL	C	FAIR	BROWN	OUTSIDE	BLDG 3-4	Positive	4.9
WINDOW	METAL	C	FAIR	BROWN	OUTSIDE	BLDG 3-4	Positive	4.3
WINDOW	METAL	B	FAIR	BROWN	OUTSIDE	BLDG 3-4	Positive	2.9
WINDOW FR	METAL	B	FAIR	BROWN	OUTSIDE	BLDG 3-4	Positive	5
WINDOW TR	WOOD	B	FAIR	BROWN	OUTSIDE	BLDG 3-4	Positive	3.9
WINDOW SILL	WOOD	B	FAIR	BROWN	OUTSIDE	BLDG 3-4	Positive	2
WINDOW FR	WOOD	A	FAIR	BROWN	OUTSIDE	MAIN BLDG	Positive	3.4
WINDOW	WOOD	A	FAIR	BROWN	OUTSIDE	MAIN BLDG	Positive	3.1
WINDOWSILL	WOOD	A	FAIR	BROWN	OUTSIDE	MAIN BLDG	Positive	3.1
FASCIA	WOOD	A	FAIR	BROWN	OUTSIDE	MAIN BLDG	Positive	3.3
EAVES AT PEAK	WOOD	A	FAIR	BROWN	OUTSIDE	MAIN BLDG	Positive	2.9
PEAK TRIM	WOOD	A	FAIR	BROWN	OUTSIDE	MAIN BLDG	Positive	3.8
FASCIA	WOOD	B	INTACT	BROWN	OUTSIDE	MAIN BLDG	Positive	5.8
PEAK TRIM	WOOD	B	INTACT	BROWN	OUTSIDE	MAIN BLDG	Positive	4.5
DOOR FR	WOOD	A	INTACT	BROWN	OUTSIDE	MAIN BLDG	Positive	5
TRANSOME	WOOD	A	INTACT	BROWN	OUTSIDE	MAIN BLDG	Positive	4.9
TRANSOME FR	WOOD	A	INTACT	BROWN	OUTSIDE	MAIN BLDG	Positive	4.5
DOOR FR	WOOD	C	INTACT	BROWN	OUTSIDE	MAIN BLDG	Positive	2.2

Component	Substrate	Side	Condition	Color	Area	Misc 1	Results	Lead mg/cm <sup>2</sup>
WINDOWSILL	WOOD	C	POOR	BROWN	OUTSIDE	MAIN BLDG	Positive	1.2
FASCIA	WOOD	D	FAIR	BROWN	OUTSIDE	MAIN BLDG	Positive	4
PEAK TRIM	WOOD	D	FAIR	BROWN	OUTSIDE	MAIN BLDG	Positive	4.4
WINDOWSILL	WOOD	D	POOR	BROWN	OUTSIDE	MAIN BLDG	Positive	2.4
WINDOW CASING	WOOD	D	POOR	BROWN	OUTSIDE	MAIN BLDG	Positive	2.4
WINDOW	WOOD	D	POOR	BROWN	OUTSIDE	MAIN BLDG	Positive	1.1
WINDOW FR	WOOD	D	POOR	BROWN	OUTSIDE	MAIN BLDG	Positive	1.6

**Table of All XRF Field Readings for Lead Paint**  
**San Antonio Elementary School**  
**650 Carne Road, Ojai, CA 93023**  
**[A Side = Carne Rd. (west)]**

Component	Substrate	Side	Condition	Color	Area	Misc 1	Results	Lead mg/cm <sup>2</sup>
CALIBRATE							Positive	1
CALIBRATE							Positive	1
CALIBRATE							Positive	1
WALL	STUCCO	A	INTACT	WHITE	OUTSIDE	BLDG 7-10	Negative	0
WALL	STUCCO	B	INTACT	WHITE	OUTSIDE	BLDG 7-10	Negative	0
WALL	STUCCO	C	INTACT	WHITE	OUTSIDE	BLDG 7-10	Negative	0
WALL	STUCCO	D	INTACT	WHITE	OUTSIDE	BLDG 7-10	Negative	0
WINDOW	METAL	B	INTACT	BLK	OUTSIDE	BLDG 7-10	Negative	0
DOOR	METAL	B	INTACT	BROWN	OUTSIDE	BLDG 7-10	Negative	0
DOOR FR	METAL	B	INTACT	BROWN	OUTSIDE	BLDG 7-10	Negative	0
DOWNSPOUT	METAL	B	INTACT	WHITE	OUTSIDE	BLDG 7-10	Negative	0
RAIN GUTTER	METAL	B	INTACT	BROWN	OUTSIDE	BLDG 7-10	Negative	0
EAVES	WOOD	B	INTACT	WHITE	OUTSIDE	BLDG 7-10	Negative	0
EAVES	WOOD	B	INTACT	WHITE	OUTSIDE	BLDG 7-10	Negative	0
FASCIA	WOOD	A	INTACT	BROWN	OUTSIDE	BLDG 7-10	Negative	0
DRIP EDGE FLASHING	WOOD	A	INTACT	BROWN	OUTSIDE	BLDG 7-10	Negative	0
DRIP EDGE FLASHING	WOOD	B	INTACT	BROWN	OUTSIDE	RESTROOM BLDG	Negative	0
RAIN GUTTER	WOOD	B	INTACT	BROWN	OUTSIDE	RESTROOM BLDG	Negative	0
FASCIA	WOOD	B	INTACT	BROWN	OUTSIDE	RESTROOM BLDG	Negative	0
EAVES	WOOD	B	INTACT	WHITE	OUTSIDE	RESTROOM BLDG	Negative	0
EAVES	WOOD	B	INTACT	WHITE	OUTSIDE	RESTROOM BLDG	Negative	0
DOWNSPOUT	METAL	B	INTACT	WHITE	OUTSIDE	RESTROOM BLDG	Negative	0
DOOR	METAL	B	INTACT	BROWN	OUTSIDE	RESTROOM BLDG	Negative	0
DOOR FR	METAL	B	FAIR	BROWN	OUTSIDE	RESTROOM BLDG	Negative	0
ATTIC VENT	METAL	A	FAIR	BROWN	OUTSIDE	RESTROOM BLDG	Negative	0
ATTIC VENT	METAL	A	INTACT	BROWN	OUTSIDE	RESTROOM BLDG	Negative	0
DOOR	METAL	A	INTACT	BROWN	OUTSIDE	RESTROOM BLDG	Negative	0

Component	Substrate	Side	Condition	Color	Area	Misc 1	Results	Lead mg/cm <sup>2</sup>
DOOR FR	METAL	A	INTACT	BROWN	OUTSIDE	RESTROOM BLDG	Negative	0
DOOR FR	STUCCO	A	INTACT	WHITE	OUTSIDE	RESTROOM BLDG	Negative	0
DOOR FR	STUCCO	B	INTACT	WHITE	OUTSIDE	RESTROOM BLDG	Negative	0
DOOR FR	STUCCO	C	INTACT	WHITE	OUTSIDE	RESTROOM BLDG	Negative	0
DOOR FR	STUCCO	D	INTACT	WHITE	OUTSIDE	RESTROOM BLDG	Negative	0
WALL	STUCCO	A	INTACT	WHITE	OUTSIDE	BLDG 6	Negative	0
WALL	STUCCO	B	INTACT	WHITE	OUTSIDE	BLDG 6	Negative	0
WALL	STUCCO	C	INTACT	WHITE	OUTSIDE	BLDG 6	Negative	0
WALL	STUCCO	D	INTACT	WHITE	OUTSIDE	BLDG 6	Negative	0
WINDOW	METAL	B	INTACT	BLK	OUTSIDE	BLDG 6	Negative	0
WINDOW CASING	WOOD	B	FAIR	BROWN	OUTSIDE	BLDG 6	Negative	0
DOOR	METAL	B	INTACT	BROWN	OUTSIDE	BLDG 6	Negative	0
DOOR FR	METAL	B	INTACT	BROWN	OUTSIDE	BLDG 6	Negative	0
DOWNSPOUT	METAL	B	INTACT	WHITE	OUTSIDE	BLDG 6	Negative	0
RAIN GUTTER	METAL	B	INTACT	BROWN	OUTSIDE	BLDG 6	Negative	0
FASCIA	METAL	B	FAIR	BROWN	OUTSIDE	BLDG 6	Negative	0
FASCIA	WOOD	B	FAIR	BROWN	OUTSIDE	BLDG 5	Negative	0.04
FASCIA	WOOD	B	FAIR	BROWN	OUTSIDE	BLDG 5	Negative	0
DOWNSPOUT	METAL	B	FAIR	WHITE	OUTSIDE	BLDG 5	Negative	0
RAIN GUTTER	METAL	B	INTACT	BROWN	OUTSIDE	BLDG 5	Negative	0
DRIP EDGE FLASHING	METAL	A	INTACT	BROWN	OUTSIDE	BLDG 5	Negative	0
EAVE	STUCCO	B	INTACT	WHITE	OUTSIDE	BLDG 5	Negative	0.02
EAVE	STUCCO	D	INTACT	WHITE	OUTSIDE	BLDG 5	Negative	0
WALL	STUCCO	A	INTACT	WHITE	OUTSIDE	BLDG 5	Negative	0.03
WALL	STUCCO	C	INTACT	WHITE	OUTSIDE	BLDG 5	Negative	0.01
WALL	STUCCO	D	INTACT	WHITE	OUTSIDE	BLDG 5	Negative	0
LOWER WALL	CONCRETE	A	FAIR	WHITE	OUTSIDE	BLDG 5	Negative	0.02
LOWER WALL	CONCRETE	B	FAIR	WHITE	OUTSIDE	BLDG 5	Negative	0.01
LOWER WALL	CONCRETE	C	FAIR	WHITE	OUTSIDE	BLDG 5	Negative	0.04

Component	Substrate	Side	Condition	Color	Area	Misc 1	Results	Lead mg/cm <sup>2</sup>
LOWER WALL	CONCRETE	D	FAIR	WHITE	OUTSIDE	BLDG 5	Negative	0.05
WINDOW	METAL	B	INTACT	BROWN	OUTSIDE	BLDG 5	Negative	0.3
WINDOW FR	METAL	B	INTACT	BROWN	OUTSIDE	BLDG 5	Negative	0.4
WINDOW CASING	WOOD	B	FAIR	BROWN	OUTSIDE	BLDG 5	Negative	0.2
DOOR	METAL	B	INTACT	BROWN	OUTSIDE	BLDG 5	Negative	0
DOOR FR	WOOD	B	FAIR	BROWN	OUTSIDE	BLDG 5	Negative	0.3
ROUND POST	METAL	D	FAIR	BROWN	OUTSIDE	BLDG 5	Negative	0.6
COLUMN	WOOD	D	INTACT	BROWN	OUTSIDE	BLDG 5	Negative	0.29
DOOR	WOOD	D	INTACT	BROWN	OUTSIDE	BLDG 5	Negative	0.12
DOOR FR	WOOD	D	INTACT	BROWN	OUTSIDE	BLDG 5	Negative	0.15
DOOR TR	WOOD	D	INTACT	BROWN	OUTSIDE	BLDG 5	Negative	0.24
WALL	STUCCO	A	FAIR	WHITE	OUTSIDE	BLDG 3-4	Negative	0
WALL	STUCCO	B	FAIR	WHITE	OUTSIDE	BLDG 3-4	Negative	0.01
WALL	STUCCO	C	INTACT	WHITE	OUTSIDE	BLDG 3-4	Negative	0
WALL	STUCCO	D	FAIR	WHITE	OUTSIDE	BLDG 3-4	Negative	0
EAVES	STUCCO	D	INTACT	WHITE	OUTSIDE	BLDG 3-4	Negative	0.02
DOWNSPOUT	METAL	D	INTACT	WHITE	OUTSIDE	BLDG 3-4	Negative	0
RAIN GUTTER	METAL	D	INTACT	BROWN	OUTSIDE	BLDG 3-4	Negative	0
<b>FASCIA</b>	<b>WOOD</b>	<b>D</b>	<b>POOR</b>	<b>BROWN</b>	<b>OUTSIDE</b>	<b>BLDG 3-4</b>	<b>Positive</b>	<b>4.2</b>
<b>FASCIA</b>	<b>WOOD</b>	<b>D</b>	<b>POOR</b>	<b>BROWN</b>	<b>OUTSIDE</b>	<b>BLDG 3-4</b>	<b>Positive</b>	<b>2.5</b>
<b>FASCIA</b>	<b>WOOD</b>	<b>A</b>	<b>POOR</b>	<b>BROWN</b>	<b>OUTSIDE</b>	<b>BLDG 3-4</b>	<b>Positive</b>	<b>3.3</b>
<b>FASCIA</b>	<b>WOOD</b>	<b>B</b>	<b>POOR</b>	<b>BROWN</b>	<b>OUTSIDE</b>	<b>BLDG 3-4</b>	<b>Positive</b>	<b>2.9</b>
<b>FASCIA</b>	<b>WOOD</b>	<b>C</b>	<b>POOR</b>	<b>BROWN</b>	<b>OUTSIDE</b>	<b>BLDG 3-4</b>	<b>Positive</b>	<b>3.7</b>
<b>WINDOW</b>	<b>METAL</b>	<b>D</b>	<b>FAIR</b>	<b>BROWN</b>	<b>OUTSIDE</b>	<b>BLDG 3-4</b>	<b>Positive</b>	<b>2.9</b>
<b>WINDOW FR</b>	<b>METAL</b>	<b>D</b>	<b>FAIR</b>	<b>BROWN</b>	<b>OUTSIDE</b>	<b>BLDG 3-4</b>	<b>Positive</b>	<b>4.1</b>
<b>WINDOW TR</b>	<b>WOOD</b>	<b>D</b>	<b>FAIR</b>	<b>BROWN</b>	<b>OUTSIDE</b>	<b>BLDG 3-4</b>	<b>Positive</b>	<b>3.2</b>
<b>WINDOW TR</b>	<b>WOOD</b>	<b>C</b>	<b>FAIR</b>	<b>BROWN</b>	<b>OUTSIDE</b>	<b>BLDG 3-4</b>	<b>Positive</b>	<b>5.4</b>
<b>WINDOW FR</b>	<b>METAL</b>	<b>C</b>	<b>FAIR</b>	<b>BROWN</b>	<b>OUTSIDE</b>	<b>BLDG 3-4</b>	<b>Positive</b>	<b>4.9</b>
<b>WINDOW</b>	<b>METAL</b>	<b>C</b>	<b>FAIR</b>	<b>BROWN</b>	<b>OUTSIDE</b>	<b>BLDG 3-4</b>	<b>Positive</b>	<b>4.3</b>

Component	Substrate	Side	Condition	Color	Area	Misc 1	Results	Lead mg/cm <sup>2</sup>
WINDOW	METAL	B	FAIR	BROWN	OUTSIDE	BLDG 3-4	Positive	2.9
WINDOW FR	METAL	B	FAIR	BROWN	OUTSIDE	BLDG 3-4	Positive	5
WINDOW TR	WOOD	B	FAIR	BROWN	OUTSIDE	BLDG 3-4	Positive	3.9
WINDOW SILL	WOOD	B	FAIR	BROWN	OUTSIDE	BLDG 3-4	Positive	2
DOOR	METAL	B	INTACT	BROWN	OUTSIDE	BLDG 3-4	Negative	0
DOOR FR	METAL	B	POOR	BROWN	OUTSIDE	BLDG 3-4	Negative	0.5
DOOR	METAL	B	FAIR	BROWN	OUTSIDE	BLDG 3-4	Negative	0.5
DOOR TR	PLASTER	B	FAIR	BROWN	OUTSIDE	BLDG 3-4	Negative	0.6
DOOR	WOOD	B	FAIR	BROWN	OUTSIDE	BLDG 3-4	Negative	0.4
DOOR FR	WOOD	B	FAIR	BROWN	OUTSIDE	BLDG 3-4	Negative	0.7
DOOR	WOOD	B	FAIR	BROWN	OUTSIDE	BLDG 3-4	Negative	0.5
DOOR	WOOD	D	FAIR	BROWN	OUTSIDE	BLDG 3-4	Negative	0.5
DOOR FR	WOOD	D	FAIR	BROWN	OUTSIDE	BLDG 3-4	Negative	0.6
DOOR TR	WOOD	D	FAIR	BROWN	OUTSIDE	BLDG 3-4	Negative	0.7
ROUND POST	METAL	D	FAIR	BROWN	OUTSIDE	BLDG 3-4	Negative	0.29
LOWER WALL	CONCRETE	A	INTACT	BLUE	OUTSIDE	BLDG 3-4	Negative	0.01
LOWER WALL	CONCRETE	B	INTACT	WHITE	OUTSIDE	BLDG 3-4	Negative	0.01
LOWER WALL	CONCRETE	C	INTACT	WHITE	OUTSIDE	BLDG 3-4	Negative	0.19
LOWER WALL	CONCRETE	D	INTACT	WHITE	OUTSIDE	BLDG 3-4	Negative	0.05
WALL	PLASTER	A	INTACT	WHITE	OUTSIDE	MAIN BLDG	Negative	0
WALL	PLASTER	B	INTACT	WHITE	OUTSIDE	MAIN BLDG	Negative	0
WALL	PLASTER	C	INTACT	WHITE	OUTSIDE	MAIN BLDG	Negative	0
WALL	PLASTER	C	INTACT	WHITE	OUTSIDE	MAIN BLDG	Negative	0
WALL	PLASTER	D	INTACT	WHITE	OUTSIDE	MAIN BLDG	Negative	0
LOWER WALL	CONCRETE	D	FAIR	WHITE	OUTSIDE	MAIN BLDG	Negative	0
LOWER WALL	CONCRETE	A	FAIR	WHITE	OUTSIDE	MAIN BLDG	Negative	0
LOWER WALL	CONCRETE	B	FAIR	WHITE	OUTSIDE	MAIN BLDG	Negative	0
LOWER WALL	CONCRETE	C	FAIR	WHITE	OUTSIDE	MAIN BLDG	Negative	0
WALL DECOR	CERAMIC TILE	A	INTACT	WHITE	OUTSIDE	MAIN BLDG	Negative	0.01

Component	Substrate	Side	Condition	Color	Area	Misc 1	Results	Lead mg/cm <sup>2</sup>
PORCH RAILING	WOOD	A	INTACT	BROWN	OUTSIDE	MAIN BLDG	Negative	0
BEAM	WOOD	A	INTACT	BROWN	OUTSIDE	MAIN BLDG	Negative	0.19
POST	WOOD	A	INTACT	BROWN	OUTSIDE	MAIN BLDG	Negative	0
DOWNSPOUT	METAL	A	INTACT	BROWN	OUTSIDE	MAIN BLDG	Negative	0
ROUNDED RAIN GUTTER	METAL	A	INTACT	BROWN	OUTSIDE	MAIN BLDG	Negative	0
WINDOW	WOOD	A	FAIR	BROWN	OUTSIDE	MAIN BLDG	Negative	0.01
<b>WINDOW FR</b>	<b>WOOD</b>	<b>A</b>	<b>FAIR</b>	<b>BROWN</b>	<b>OUTSIDE</b>	<b>MAIN BLDG</b>	<b>Positive</b>	<b>3.4</b>
<b>WINDOW</b>	<b>WOOD</b>	<b>A</b>	<b>FAIR</b>	<b>BROWN</b>	<b>OUTSIDE</b>	<b>MAIN BLDG</b>	<b>Positive</b>	<b>3.1</b>
<b>WINDOWSILL</b>	<b>WOOD</b>	<b>A</b>	<b>FAIR</b>	<b>BROWN</b>	<b>OUTSIDE</b>	<b>MAIN BLDG</b>	<b>Positive</b>	<b>3.1</b>
<b>FASCIA</b>	<b>WOOD</b>	<b>A</b>	<b>FAIR</b>	<b>BROWN</b>	<b>OUTSIDE</b>	<b>MAIN BLDG</b>	<b>Positive</b>	<b>3.3</b>
<b>EAVES AT PEAK</b>	<b>WOOD</b>	<b>A</b>	<b>FAIR</b>	<b>BROWN</b>	<b>OUTSIDE</b>	<b>MAIN BLDG</b>	<b>Positive</b>	<b>2.9</b>
<b>PEAK TRIM</b>	<b>WOOD</b>	<b>A</b>	<b>FAIR</b>	<b>BROWN</b>	<b>OUTSIDE</b>	<b>MAIN BLDG</b>	<b>Positive</b>	<b>3.8</b>
COVERED WALKWAY CEILING	WOOD	A	FAIR	BROWN	OUTSIDE	MAIN BLDG	Negative	0.09
COVERED WALKWAY RAFTERS	WOOD	A	FAIR	BROWN	OUTSIDE	MAIN BLDG	Negative	0.08
DOOR	WOOD	A	FAIR	BROWN	OUTSIDE	MAIN BLDG	Negative	0.5
DOOR	WOOD	A	FAIR	BROWN	OUTSIDE	MAIN BLDG	Negative	0.21
DOOR	WOOD	A	FAIR	BROWN	OUTSIDE	MAIN BLDG	Negative	0.02
DOOR	WOOD	A	FAIR	BROWN	OUTSIDE	MAIN BLDG	Negative	0.7
DOOR FR	WOOD	A	FAIR	BROWN	OUTSIDE	MAIN BLDG	Negative	0.7
TRANSOME	WOOD	A	INTACT	BROWN	OUTSIDE	MAIN BLDG	Negative	0.03
TRANSOME FR	WOOD	A	INTACT	BROWN	OUTSIDE	MAIN BLDG	Negative	0.1
DOOR	WOOD	B	INTACT	BROWN	OUTSIDE	MAIN BLDG	Negative	0.11
DOOR FR	WOOD	B	INTACT	BROWN	OUTSIDE	MAIN BLDG	Negative	0.09
DOOR JM	WOOD	B	INTACT	BROWN	OUTSIDE	MAIN BLDG	Negative	0.09
RAFTER TAILS	WOOD	B	INTACT	BROWN	OUTSIDE	MAIN BLDG	Negative	0.03
FASCIA	WOOD	B	INTACT	BROWN	OUTSIDE	MAIN BLDG	Negative	0.01
FASCIA	WOOD	B	INTACT	BROWN	OUTSIDE	MAIN BLDG	Negative	0.01
BEAM	WOOD	B	INTACT	BROWN	OUTSIDE	MAIN BLDG	Negative	0.02
<b>FASCIA</b>	<b>WOOD</b>	<b>B</b>	<b>INTACT</b>	<b>BROWN</b>	<b>OUTSIDE</b>	<b>MAIN BLDG</b>	<b>Positive</b>	<b>5.8</b>

Component	Substrate	Side	Condition	Color	Area	Misc 1	Results	Lead mg/cm <sup>2</sup>
<b>PEAK TRIM</b>	<b>WOOD</b>	<b>B</b>	<b>INTACT</b>	<b>BROWN</b>	<b>OUTSIDE</b>	<b>MAIN BLDG</b>	<b>Positive</b>	<b>4.5</b>
DOOR	WOOD	A	INTACT	BROWN	OUTSIDE	MAIN BLDG	Negative	0
<b>DOOR FR</b>	<b>WOOD</b>	<b>A</b>	<b>INTACT</b>	<b>BROWN</b>	<b>OUTSIDE</b>	<b>MAIN BLDG</b>	<b>Positive</b>	<b>5</b>
<b>TRANSOME</b>	<b>WOOD</b>	<b>A</b>	<b>INTACT</b>	<b>BROWN</b>	<b>OUTSIDE</b>	<b>MAIN BLDG</b>	<b>Positive</b>	<b>4.9</b>
<b>TRANSOME FR</b>	<b>WOOD</b>	<b>A</b>	<b>INTACT</b>	<b>BROWN</b>	<b>OUTSIDE</b>	<b>MAIN BLDG</b>	<b>Positive</b>	<b>4.5</b>
WALL TRIM	WOOD	C	INTACT	BROWN	OUTSIDE	MAIN BLDG	Negative	0
DOOR	WOOD	C	INTACT	BROWN	OUTSIDE	MAIN BLDG	Negative	0
<b>DOOR FR</b>	<b>WOOD</b>	<b>C</b>	<b>INTACT</b>	<b>BROWN</b>	<b>OUTSIDE</b>	<b>MAIN BLDG</b>	<b>Positive</b>	<b>2.2</b>
HANDRAIL	METAL	C	INTACT	BROWN	OUTSIDE	MAIN BLDG	Negative	0
DOWNSPOUT	METAL	C	INTACT	WHITE	OUTSIDE	MAIN BLDG	Negative	0.25
RAIN GUTTER	METAL	C	POOR	WHITE	OUTSIDE	MAIN BLDG	Negative	0.07
<b>WINDOWSILL</b>	<b>WOOD</b>	<b>C</b>	<b>POOR</b>	<b>BROWN</b>	<b>OUTSIDE</b>	<b>MAIN BLDG</b>	<b>Positive</b>	<b>1.2</b>
WALL TRIM	WOOD	C	POOR	BROWN	OUTSIDE	MAIN BLDG	Negative	0.03
WALL TRIM	WOOD	C	POOR	BROWN	OUTSIDE	MAIN BLDG	Negative	0.16
<b>FASCIA</b>	<b>WOOD</b>	<b>D</b>	<b>FAIR</b>	<b>BROWN</b>	<b>OUTSIDE</b>	<b>MAIN BLDG</b>	<b>Positive</b>	<b>4</b>
<b>PEAK TRIM</b>	<b>WOOD</b>	<b>D</b>	<b>FAIR</b>	<b>BROWN</b>	<b>OUTSIDE</b>	<b>MAIN BLDG</b>	<b>Positive</b>	<b>4.4</b>
<b>WINDOWSILL</b>	<b>WOOD</b>	<b>D</b>	<b>POOR</b>	<b>BROWN</b>	<b>OUTSIDE</b>	<b>MAIN BLDG</b>	<b>Positive</b>	<b>2.4</b>
<b>WINDOW CASING</b>	<b>WOOD</b>	<b>D</b>	<b>POOR</b>	<b>BROWN</b>	<b>OUTSIDE</b>	<b>MAIN BLDG</b>	<b>Positive</b>	<b>2.4</b>
<b>WINDOW</b>	<b>WOOD</b>	<b>D</b>	<b>POOR</b>	<b>BROWN</b>	<b>OUTSIDE</b>	<b>MAIN BLDG</b>	<b>Positive</b>	<b>1.1</b>
<b>WINDOW FR</b>	<b>WOOD</b>	<b>D</b>	<b>POOR</b>	<b>BROWN</b>	<b>OUTSIDE</b>	<b>MAIN BLDG</b>	<b>Positive</b>	<b>1.6</b>
WINDOW	METAL	D	FAIR	BROWN	OUTSIDE	MAIN BLDG	Negative	0.03
WINDOW	METAL	D	FAIR	BROWN	OUTSIDE	MAIN BLDG	Negative	0.01
WINDOW FR	METAL	D	FAIR	BROWN	OUTSIDE	MAIN BLDG	Negative	0
CALIBRATE							Positive	1
CALIBRATE							Positive	1
CALIBRATE							Positive	1



**XRF Sampling Methodology:** All inspections include a visual inspection of site surfaces to identify painted components and general site conditions. Field testing is performed by a CA Certified Lead Inspector/Assessor using a Niton X-Ray fluorescence (XRF) lead paint analyzer. The XRF sampling method uses a field instrument (X-Ray Fluorescence or XRF gun) to characterize suspect painted surfaces and components. XRF equipment is used to sample materials suspected of being coated with lead-based paint and lead-containing materials by “reading” the suspect materials through direct contact. The advantage of this method is that it provides instantaneous results and is a non-destructive method which allows for the collection of as many samples as time allows for the daily cost of the instrument. This survey method can also identify lead in ceramic tiles, porcelain or other suspect building materials. The survey attempts to define the extent of LBP and estimate quantities where possible. Paint is determined positive using the CA Dept. of Health Services criteria of 1.0 milligrams per square centimeter (mg/cm<sup>2</sup>). During the survey, the front or main side of the building is typically designated as the “A” side, with the remaining sides designated as “B”, “C” and “D” continuing in a clockwise manner. Where appropriate, a field sketch or plot plan is provided.

**Instrument Calibration:** The calibration of the Niton XLP 300A X-Ray fluorescence (XRF) instrument is done in accordance with the Performance Characteristic Sheet (PCS) for this instrument. These XRF instruments are calibrated using a calibration standard block of known lead content. Three calibration readings are taken before and after each property is tested to ensure manufacturer’s standards are met. If the inspection is longer than 4 hours, a set of 3 calibration readings must be taken before the 4 hours expires, and then an additional 3 calibration readings taken at the end of the inspection. If for any reason the instruments are not maintaining a consistent calibration reading within the manufacturer’s standards for performance on the calibration block supplied by the manufacturer, manufacturer’s recommendations are used to bring the instrument into calibration. If the instrument cannot be brought back into calibration, it is taken off the site and sent back to the manufacturer for repair and/or re-calibration.

**Inspector Training and Qualifications:** All inspectors utilized by FCG are Certified Lead Inspectors/Assessors, having obtained certification through the *California Department of Public Health (CDPH)*. All inspectors have taken a State-certified 40-hour Inspector/Assessor course and passed the State Inspector/Assessor Exam. All FCG field personnel have also been trained in the use, calibration and maintenance of the X-Ray Fluorescence (XRF) equipment they currently use, along with necessary principles of radiation safety through a training program provided by the manufacturer.

**Equipment Information:** The field instrument used on this project was a Niton Model XLP 300A X-Ray fluorescence (XRF) lead paint analyzer (Serial No. 10106). The Niton instrument uses a high performance, electrically cooled, solid-state detector optimized for lead (Pb) analysis using L-shell and K-shell x-ray detection. This instrument allows for XRF spectrum analysis in the field with automatic Positive/Negative decision and automatic corrections for substrate bias and age of source. All negative classifications in all paint-test modes are verified by negative K-shell x-ray readings. Please see Attachment 2 for a copy of the Performance Characteristic Sheet provided by Niton for the XLP 300A instrument. This document contains detailed information regarding the XRF instrument calibration, inconclusive range or thresholds for various substrates, operating parameters and other information. For more information on the Niton Model XLP 300A instrument, please visit the following website: [www.thermo.com/niton](http://www.thermo.com/niton)

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## Attachment 3

### FCG Inspector Certifications



## Alan W. Forbess, Certifications (2022)

State of California  
Division of Occupational Safety and Health  
**Certified Asbestos Consultant**

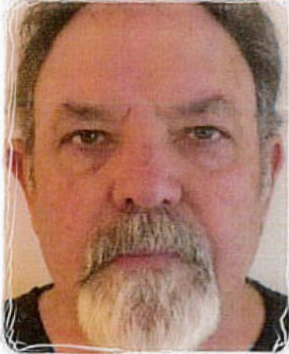
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**Alan Wayne Forbess**  
Name

Certification No. **94-1549**


Expires on **01/12/22**

This certification was issued by the Division of Occupational Safety and Health as authorized by Sections 7180 et seq. of the Business and Professions Code.

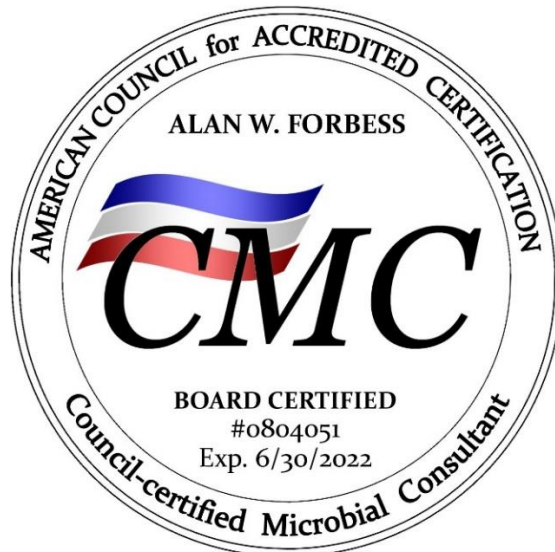


 STATE OF CALIFORNIA  
DEPARTMENT OF PUBLIC HEALTH 

### LEAD-RELATED CONSTRUCTION CERTIFICATE

INDIVIDUAL:	CERTIFICATE TYPE:	NUMBER:	EXPIRATION DATE:
 Alan Forbess	Lead Inspector/Assessor Lead Project Monitor	LRC-00000505 LRC-00000504	6/18/2022 6/18/2022

Disclaimer: This document alone should not be relied upon to confirm certification status. Compare the individual's photo and name to another valid form of government issued photo identification. Verify the individual's certification status by searching for Lead-Related Construction Professionals at [www.cdph.ca.gov/programs/clpph](http://www.cdph.ca.gov/programs/clpph) or calling (800) 597-LEAD.



**FCG Staff Certifications – William A. Miller**

State of California  
Division of Occupational Safety and Health  
**Certified Site Surveillance Technician**

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**William A Miller**  
Name




Certification No. 07-4160

Expires on 03/22/22


This certification was issued by the Division of Occupational Safety and Health as authorized by Sections 7180 et seq. of the Business and Professions Code.



STATE OF CALIFORNIA  
DEPARTMENT OF PUBLIC HEALTH



## LEAD-RELATED CONSTRUCTION CERTIFICATE

INDIVIDUAL:	CERTIFICATE TYPE:	NUMBER:	EXPIRATION DATE:
 <b>William Miller</b>	Lead Inspector/Assessor Lead Project Monitor	LRC-0000721 LRC-0000720	6/13/2022 6/13/2022

Disclaimer: This document alone should not be relied upon to confirm certification status. Compare the individual's photo and name to another valid form of government issued photo identification. Verify the individual's certification status by searching for Lead-Related Construction Professionals at [www.cdph.ca.gov/programs/clppb](http://www.cdph.ca.gov/programs/clppb) or calling (800) 597-LEAD.



NIOSH582-022508-001  
*Certificate Number*

ENVIRONMENTAL NETWORK CORPORATION  
16750 Valley View Avenue, La Mirada, California 90638  
(714) 523-9811 Fax (714) 523-9810  
main@encorp.net

This is to certify that

*William Miller*

000-00-7208

has attended and satisfactorily completed the course in  
Sampling and Evaluating Airborne Asbestos Dust  
**NIOSH 582 Equivalent**

on this day  
February 29, 2008




  
William Bohning *Course Instructor*

  
Miguel Orozco *Laboratory Manager*



# Blake Forbess Certifications 2020-2021



	STATE OF CALIFORNIA DEPARTMENT OF PUBLIC HEALTH		
<b>LEAD-RELATED CONSTRUCTION CERTIFICATE</b>			
<b>INDIVIDUAL:</b>	<b>CERTIFICATE TYPE:</b>	<b>NUMBER:</b>	<b>EXPIRATION DATE:</b>
 <b>Blake Forbess</b>	Lead Sampling Technician	LRC-00003725	10/31/2021
<p>Disclaimer: This document alone should not be relied upon to confirm certification status. Compare the individual's photo and name to another valid form of government issued photo identification. Verify the individual's certification status by searching for Lead-Related Construction Professionals at <a href="http://www.cdph.ca.gov/programs/clppb">www.cdph.ca.gov/programs/clppb</a> or calling (800) 597-LEAD.</p>			

## Attachment 4

### Lead Safe Work Practices



## Lead Safe Work Practices - General

Lead mitigation work will be performed in accordance with Title 17 and Title 8 of the California Code of Regulations, and with Section 1017 of the Residential Lead-Based Paint Hazard Reduction Act of 1992, better known as Title X or HUD. The Federal HUD Guidelines are the industry standard used for interim controls or abatement of lead hazards. This specification complies with Chapter 11: Interim Controls, Section II - Paint Film Stabilization.

### Lead Safe Work Practices

1. All work where lead or lead-based paint will be disturbed shall be performed by lead-trained workers using appropriate controls to prevent lead dust and paint chip contamination of the site. Once the surfaces have been stabilized, normal contracting personnel may perform tasks as long as there is no generation of lead dust through “trigger tasks” such as grinding, sanding, cutting or similar actions where lead dust may be generated.
2. Exterior paint film stabilization will include the removal of loose, chipped, cracking, flaking, blistering, or chalking paint from the painted surfaces where LBP has been identified. Hand-scraping or sanding using wet methods, vacuum powered tools or chemical stripping are the only acceptable methods for removal of loose and flaking materials to bring the surfaces to an intact condition.
3. All loose and peeling paint that can be lifted with thumbnail pressure shall be removed. Surfaces shall be misted with water and kept wet during scraping and sanding operations. Any nails, screws, or other protrusions shall be removed if possible. All voids will be filled and sharp edges will be sanded.
4. Containment shall be in place prior to the start of any scraping activities or the removal of any lead-painted building components, ceramic tiles or porcelain fixtures. One layer of 6-mil polyethylene sheeting (drop sheet) shall be placed on the ground surfaces below the work area, including existing landscaping and shrubbery if working outside. The drop sheet shall extend a minimum distance of at least 10 feet in all directions from the working surfaces. Anchor any scaffolding or ladders to the ground below the plastic by cutting the plastic, using boards or other methods to avoid slippage. Weight plastic sheeting down and secure to the building or nearby walls with tape or other anchoring system. The edges of the plastic should be raised to prevent run-off and contain surface water. Extreme care shall be taken to ensure that paint chips, dust and water are not allowed to migrate beyond the plastic containment. Increase the size of the plastic sheeting to allow for larger containment area depending upon the height of the working surface and the potential for paint chips, dust and debris to fall outside the containment area.
5. For exterior surfaces, all nearby area drains, storm drains or other waterways in close proximity should be bermed or covered to prevent contaminated water, dust or other runoff from entering the storm drain system.

6. Ensure that all critical openings (doors, windows, vent openings, etc.) within close proximity (~20') of the designated work area are sealed to prevent migration of dust and debris and to prevent accidental exposure to unprotected areas near the work surfaces. All plastic sheeting should be a minimum 6-mil thickness.
7. Remove all moveable items to at least 20' distance from the working surfaces. Items that cannot be moved should be protected in place by covering with plastic.
8. Erect temporary exclusion zones in the designated work areas by using caution tape, fencing or similar barriers at a distance of at least 20' from the perimeter of the building. Require local pedestrian and vehicle traffic to use alternate routes of ingress and egress if sidewalks, parking areas or other traffic patterns are within the 20' buffer.
9. Post warning signs at the entrance to each work area and, if working outdoors, at a 20' perimeter, unless distance to nearest building or sidewalk is less than 20'.
10. Pre-clean surfaces in the proposed work areas by HEPA vacuuming, wet sweeping, mopping or raking up all visible paint chips and suspected lead-paint debris. This should be performed prior to placement of plastic sheeting. If landscaped areas are located in the immediate work area, we recommend collecting soil samples to determine the background levels of total lead prior to beginning mitigation work. These samples may be used later if post-mitigation sampling shows elevated lead levels in surface soils.
11. All workers shall wear appropriate personal protective equipment, including full-body disposable coveralls, half-mask or full-face air purifying respirators with HEPA filtration cartridges, gloves and similar controls per the Contractor's Health & Safety Program for lead abatement work.
12. A worker decontamination area shall be placed within a designated location at the work site. The decontamination area shall accommodate preparation of all personnel entering and exiting the work site. At no time will changing into or out of protective clothing be permitted outside of the decontamination area. All personal protective equipment (respirators, suits, gloves, etc.) shall be decontaminated or disposed of prior to leaving the site. Washing facilities must be provided within the designated decontamination area to allow workers to wash their face and hands each time they leave the work area.
13. Exterior work shall not be conducted in conditions where external wind speed exceeds 20 mph.
14. Contractor shall not remove paint by burning, torching, power sanding or dry scraping without HEPA attachments, or any uncontained abrasive blasting. Chemical strippers containing methylene chloride shall not be used. The use of rotary tools, power tools and other mechanical removal methods that would generate lead dust is prohibited unless they can be operated using vacuum attachments equipped with HEPA filtration equipment and using full containment with negative air conditions.



- 15. Hydroblasting, pressure washing or other abrasive blasting is prohibited unless full containment can be achieved using appropriate controls to capture all effluent and dust emissions. All wastewater must be contained and filtered to remove lead paint chips or disposed at a permitted off-site facility.
- 16. Any alternative method must be pre-approved by the Environmental Consultant prior to implementation.
- 17. All surfaces shall be scraped to remove loose and flaking materials, using wet methods. Following all scraping of paint to an intact condition, the surfaces shall be wet wiped with a surfactant/water mixture to remove surface dust and debris. The surfaces shall be thoroughly dried prior to application of primer or encapsulating materials.
- 18. Contractor shall use wet methods, HEPA filtration equipment or similar controls to prevent dust and fiber emissions from impacting the structure. Contractor shall take appropriate measures to prevent lead dust which is generated from escaping the immediate work area, including the installation of critical barriers on the interior of the building as necessary to prevent migration of lead dust.
- 19. All visible debris shall be cleaned up at the end of each workday. Prior to removal, all protective polyethylene sheeting will be HEPA vacuumed and wet wiped and disposed of in accordance with this work plan.
- 20. Containerized lead waste from paint scraping activities, ceramic tile removal or similar waste generating activities shall be segregated and disposed of in accordance with the waste disposal section below.
- 21. All surfaces within the work area shall be inspected to ensure the site is free of paint chips and related debris upon conclusion of all field work to remove or mitigate lead paint, removal of lead components, removal of ceramic tiles, or similar activities. Confirmation dust wipe samples are recommended to ensure that the site has not been contaminated by the lead mitigation work.
- 22. Upon conclusion of the lead mitigation in a work area, FCG Environmental shall conduct a clearance examination and provide appropriate documentation of compliance with lead regulations. Wipe samples may be collected from exterior surfaces as necessary to document proper clearance. Clearance levels per EPA and California are as follows:

<u>Location</u>	<u>State &amp; EPA Clearance Levels</u>
Interior Floors	F0 µg/ft <sup>2</sup>
Interior Window Sills	250 µg/ft <sup>2</sup>
Exterior Surfaces	400 µg/ft <sup>2</sup>

- 23. For exterior work, soil samples shall be taken in accordance with HUD Guidelines using composite sampling with a minimum of 5 aliquots per each area sampled. We recommend collect baseline soil samples prior to project commencement to determine lead concentrations in soils. Additional samples should be taken upon completion of field work to determine if additional lead

contamination has resulted from paint preparation. Please contact FCG for additional information or assistance regarding soil sampling protocols and requirements.

24. Soil samples will be analyzed for Total Lead by EPA Method 7420 or equivalent. Concentrations above 1,000 mg/kg meet California Hazardous Waste criteria and will require treatment or excavation to remove the impacted soils per state regulations. Concentrations greater than 50 mg/kg shall be analyzed by Waste Extraction Test (WET) method to determine soluble lead levels. Concentrations of soluble lead in soils above 5 milligrams per liter (mg/L) meet California Hazardous Waste criteria and must be treated or excavated per state regulations.
25. If soil contamination is found, abatement or mitigation work may be required, including excavation of top soils, importing clean fill or sod, paving, planting of thorny bushes or similar exclusion measures to prevent contact with contaminated soils. Further discussion with the client should be conducted prior to implementation of mitigation measures.
26. The prepared surfaces shall be coated with a suitable primer or encapsulating compound as soon as practical following lead mitigation tasks. The priming or encapsulation may be conducted by licensed painting contractors or others and is not required as part of the mitigation contractor's scope. All primers, encapsulating materials or other coatings must be compatible with the underlying substrate and the specified finish coating per paint specification.
27. Once the painted components such as doors, windows, frames, etc., have been stabilized, they may be removed by normal contracting personnel as long as no lead dust will be generated during the removal process. If sanding, grinding, cutting or similar activities will be required that will disturb lead-based paint, then lead trained workers must perform these tasks using appropriate control measures.
28. If components with lead-based paint will be stripped using a chemical dip tank or similar methods, the resulting waste is considered hazardous and must be disposed of according to Title 22 of the California Code of Regulations and EPA (40 CFR) regulations. Permits may be required for on-site treatment. Further investigation into use of a dip-tank or chemical stripping may be required to determine all handling, permitting and disposal requirements. If components are sent to an off-site location, the outside vendor must be notified that lead-based paint is present in the various components and will require proper handling and disposal.

### **Lead Waste Disposal**

1. The Contractor is responsible for any required testing and for the ultimate disposal of all waste generated from the work of this section. This waste may include, but is not limited to, lead-painted building components, lead paint chips, asbestos window putty, solvents and caustics used in any stripping process, HEPA filters, wash water, disposable work clothes and respirator filters.

2. The Contractor shall assume that all lead paint chips, sludge from lead removal stripping, or similar lead-containing waste is hazardous waste unless laboratory analytical data proves otherwise. Contractor shall submit laboratory analysis characterizing all lead containing waste for disposal.
3. Waste samples will be analyzed for Total Lead. Concentrations above 1,000 mg/kg meet California Hazardous Waste criteria and will require disposal at a permitted Class I Landfill or treatment facility. Concentrations of Total Lead greater than 50 mg/kg shall be analyzed by Waste Extraction Test (WET) method to determine soluble lead levels by STLC. Concentrations above 5 milligrams per liter (mg/L) meet California Hazardous Waste criteria and must be disposed as hazardous waste. If necessary, analysis by TCLP method will be required to determine if the concentration is below 5 mg/L for determination of RCRA waste criteria. Lead containing waste streams not meeting hazardous waste criteria per federal or state requirements may be disposed at a permitted facility with proper approvals. FCG can assist as necessary in the proper characterization of waste streams.
4. Contractor shall store all waste in appropriate, compatible containers/drums for disposal as hazardous waste and shall be labeled and stored in accordance with all applicable regulations. Containerized lead waste from exterior scraping activities (paint chips, soils, etc.), chemical stripping of lead painted building components shall be segregated and disposed of in accordance with current regulations per Title 22 of the California Code of Regulations.
5. Copies of all waste disposal documentation shall be delivered to the owner or Environmental Consultant upon receipt. The Contractor shall notify and obtain approval at permitted disposal or treatment facilities, with a copy to the Owner, for disposal of all lead or asbestos waste streams.
6. The Contractor is responsible for completing all disposal documents, which may include, but are not limited to, waste profiles, hazardous waste manifests and land ban restriction forms. The property owner shall be designated as the Generator on all manifesting documents. All hazardous waste manifests shall be signed by a designated owner's representative who will also provide the appropriate EPA # and Generator Status. All disposal documents shall be delivered to the owner's representative for signature prior to waste transportation.