



Environmental Consulting Services  
Asbestos • Mold • Lead • Property Assessment

May 15, 2019

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

**Subject: Exterior Painting Project – Asbestos & Lead Survey**  
Topa Topa Elementary School – Buildings A – E & K  
916 Mountain View Avenue  
Ojai, CA 93023  
*FCG Project Code: Ojai USD-50*

Dear Mr. Dutter:

FCG Environmental (FCG) performed a hazardous materials survey at the above-referenced property, which included asbestos bulk sampling and lead-based paint testing. The investigation was performed on March 19, 2019 by Blake Forbess, CA Certified Lead Sampling Technician (No. 28474) and CA Certified Site Surveillance Technician (No. 18-6328) under the supervision of Alan Forbess, a CA Certified Asbestos Consultant (No. 94-1549) and CA Certified Lead Inspector/Assessor Project Monitor (No. 17425). This report documents the results of our survey, which was conducted to identify proper handling of hazardous materials prior to renovation/painting activities.

## 1.0 Background Information / Scope of Project

**Background/Site Description:** The subject site includes a total of seven structures that are all scheduled for exterior painting/repairs. Buildings A, B and C are part of the original school construction. Buildings D, E and K are modular structures, with wood siding, metal windows and wood doors. Building A contains seven classrooms, the administration office, MPR and kitchen. Building A has stucco exterior walls, metal windows and wood and metal doors. Buildings B & C have metal exterior walls, metal windows and metal doors.

**Scope of Project:** FCG was asked to perform a survey of exterior building materials that may be disturbed as part of the exterior painting project, to identify hazardous materials concerns in accordance with federal, state and local regulations. The following services were conducted to define asbestos and lead concerns at the subject site:

- A visual inspection of representative exterior building materials was conducted to identify suspect asbestos and lead paint materials.
- Bulk samples were collected from representative suspect materials for submittal to a qualified laboratory for asbestos analysis. All bulk samples were analyzed by Forensic Analytical, a state-certified laboratory located in Rancho Dominguez, CA. All samples were analyzed by polarized light microscopy (PLM), to determine asbestos fiber concentrations in bulk building material samples. PLM is applicable for the analysis of building survey submissions and other bulk materials.

- Screening 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, laboratory analytical data, XRF readings and other findings have been evaluated, with this written report summarizing our findings and providing recommendations as necessary.

## 2.0 Asbestos Survey Findings

**Suspect Materials:** After a visual inspection of the subject site structures was completed, the following suspect asbestos containing materials were noted:

- Exterior plaster/stucco – Building A (All other buildings are wood or metal siding)
- Window putty/glazing – Buildings B & C (No putty was noted on the other buildings)

**Bulk Sampling Results:** FCG collected 9 bulk samples from suspect asbestos containing materials at the subject site. Samples were forwarded to Forensic Analytical, a certified asbestos laboratory located in Rancho Dominguez, CA. All samples were analyzed by Polarized Light Microscopy (PLM) using EPA Method 600/R-93-116, Visual Area Estimation. Table 1 below provides a summary of those materials which tested positive for asbestos based on laboratory analytical data. Please refer to the Attachments for a complete copy of the laboratory analytical results.

**Table 1: List of Identified Asbestos Containing Materials**

Sample ID	Asbestos Containing Material	Location (Est. quantity)	% Asbestos (Chrysotile)	Category & Friability
1-3	Exterior Wall Plaster/Stucco	Building A	Grey Plaster = ND <b>Green Plaster = Trace (&lt;1%)</b> Paint = ND Off-White Plaster = ND	Category II, Non-Friable Material
5 & 6	Window Putty	Building B (North side windows)	<b>Grey Putty = Trace (&lt;1%)</b> Paint = ND	Category II, Non-friable Material
8 & 9	Window Putty	Building C (North side windows)	<b>Grey Putty = Trace (&lt;1%)</b> Paint = ND	Category II, Non-friable Material

**Materials Showing a “Trace” of Asbestos:** The exterior stucco on Building A and window putty materials on Buildings B & C showed a “trace” or less than 1% asbestos by standard PLM methodology. Further analysis by more quantitative methods such as “Point Count” or transmission electron microscopy (TEM) would be required to quantify the actual concentration of asbestos in “trace” PLM sample results. Otherwise, these materials must be managed as ACM.

**Note:** All Buildings other than Building A (B, C, D, E, F, G & H) are metal or wood sided and no window putty was noted on Buildings (A, D, E, F, G & H).

**Notes on Tables and Assessment Terms**

- 1) Asbestos containing material (ACM): Federal and County APCD regulations define ACM as any material or product that contains more than 1% asbestos.
- 2) Asbestos containing construction material (ACCM): State regulations define ACCM as any material with greater than 0.1% asbestos by weight.
- 3) Asbestos renovation: Defined by NESHAPS as the removal of more than 160 square feet or 260 linear feet of ACM. OSHA requires registration of all contractors removing more than 100 sq. ft. on any project.
- 4) Friable ACM: any ACM that when dry can be crumbled, pulverized, or reduced to powder by normal hand pressure.
- 5) Non-friable ACM: any ACM that **cannot** be reduced to powder by normal hand pressure.
- 6) Category I non-friable ACM: asbestos-containing packings, gaskets, resilient floor covering, and asphalt roofing products (typically pliable materials, including sealants and mastics).
- 7) Category II non-friable ACM: any other ACM that when dry **cannot** be reduced to powder by hand pressure (typically non-pliable/cementitious materials).
- 8) Regulated Asbestos Containing Material (RACM): any friable ACM that will be removed during a renovation of a regulated structure. ACM that will become friable due to the removal technique is also regulated. Note: while linoleum flooring is considered Category II ACM while managed in place, removal *always* renders it friable.
- 9) Presumed Asbestos Containing Materials (PACM): This designation is for those materials which are normally asbestos containing but were not sampled due to access issues or potential for irreparable damage. This typically includes transite (asbestos cement) piping or sheeting, or HVAC insulation materials in walls, under floors, etc. where destructive testing is not recommended. Regulations allow asbestos inspectors to “presume” that these materials contain asbestos without laboratory data based on the inspector’s experience and knowledge of building materials.
- 10) Trace (<1%) Asbestos: Federal and local APCD regulations define an asbestos containing material (ACM) as any compound with greater than 1% asbestos. The State of California through Cal-OSHA regulation further defines an asbestos containing material as any compound which meets or exceeds a concentration of 0.1% asbestos by weight. This definition is primarily for worker and occupant protection during disturbance work. The polarized light microscopy (PLM) method does not quantify the concentration asbestos in bulk samples at levels of less than 1%. Furthermore, PLM methodology will include all fibers with a similar aspect ratio (3:1) to asbestos fibers, and therefore may count non-asbestos fibers as part of the overall total. PLM analytical methods must report a “trace” amount where fibers are noted in concentrations of less than 1% of the total. Further analysis by more quantitative methods such as “Point Count” or transmission electron microscopy (TEM) are required to quantify the actual concentration of asbestos in “trace” PLM sample results.

Summary: Our survey has identified Asbestos Containing Materials (ACM) at the site which may require abatement or special handling as part of future renovation/painting activities. It should be noted that no suspect ACMs were noted at Buildings D, E or K. Please see the Conclusions & Recommendations (Section 4.0) below for further discussion regarding the abatement and proper handling of asbestos containing materials.

### 3.0 Lead-Based Paint Survey Findings

FCG was contracted to perform field testing to determine the presence of lead-based paint or lead components throughout the exterior of the structures scheduled for painting. A visual inspection of the site was conducted to identify areas of suspect lead-based paint or coatings. 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 Certified Lead Sampling Technician. The findings of this survey will be used by contracting personnel to determine appropriate lead safe work practices prior to 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.

**Inspection Results:** Per EPA and California regulations, paints or coatings are considered to be lead-based with lead concentrations at or above 1.0 milligram per square centimeter (mg/cm<sup>2</sup>) using XRF technology. FCG tested representative surfaces throughout the subject site. Calibration tests were performed at the beginning of the survey and again at the end of the survey to document that the equipment was working properly.

**Summary of LBP:** We have listed below those surfaces with lead concentrations greater than 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. Please refer to the Attachments section for a complete copy of the XRF Table and materials sampled.

**Table 2: XRF Lead Table – Positive Readings**

Component	Substrate	Side	Condition	Color	Room	Building/Area	Results	Lead mg/cm2
DOOR FR	WOOD	A	INTACT	GREEN	OUTSIDE	BLDG A	Positive	1.9
VENT	METAL	A	INTACT	WHITE	OUTSIDE	BLDG A	Positive	7.4
EAVE	WOOD	A	POOR	WHITE	OUTSIDE	BLDG A	Positive	9.2
EAVE	WOOD	B	POOR	WHITE	OUTSIDE	BLDG A	Positive	8.4
EAVE	WOOD	C	POOR	WHITE	OUTSIDE	BLDG A	Positive	7.2
EAVE	WOOD	D	POOR	WHITE	OUTSIDE	BLDG A	Positive	7.3
FASCIA	WOOD	A	CHALKING	GREEN	OUTSIDE	BLDG A	Positive	9.8
FASCIA	WOOD	B	CHALKING	GREEN	OUTSIDE	BLDG A	Positive	8.2
FASCIA	WOOD	C	CHALKING	GREEN	OUTSIDE	BLDG A	Positive	7.2
FASCIA	WOOD	D	CHALKING	GREEN	OUTSIDE	BLDG A	Positive	8.9
DOOR FR	WOOD	B	INTACT	GREEN	OUTSIDE	BLDG A	Positive	1.6
POST	METAL	B	FAIR	GREEN	OUTSIDE	BLDG A	Positive	4.7
BEAM	WOOD	B	INTACT	WHITE	OUTSIDE	BLDG A	Positive	11.8
DOOR FR	WOOD	C	INTACT	GREEN	OUTSIDE	BLDG A	Positive	2
VENT	METAL	C	POOR	WHITE	OUTSIDE	BLDG A	Positive	4.7
POST	METAL	D	FAIR	GREEN	OUTSIDE	BLDG A	Positive	6.1
BEAM	WOOD	D	INTACT	WHITE	OUTSIDE	BLDG A	Positive	5.8
FASCIA	WOOD	D	POOR	GREEN	OUTSIDE	BLDG A	Positive	4.8
DOOR FR	WOOD	D	POOR	GREEN	OUTSIDE	BLDG A	Positive	1.3
DOOR TR	WOOD	D	POOR	GREEN	OUTSIDE	BLDG A	Positive	1.3
DOOR JM	WOOD	D	POOR	GREEN	OUTSIDE	BLDG A	Positive	1.2
VENT	METAL	D	POOR	WHITE	OUTSIDE	BLDG A	Positive	8.5
DOOR FR	METAL	A	FAIR	WHITE	OUTSIDE	BLDG B	Positive	1.3
DOOR JM	METAL	A	FAIR	WHITE	OUTSIDE	BLDG B	Positive	1.1
WINDOW	METAL	C	POOR	WHITE	OUTSIDE	BLDG B	Positive	1
WINDOW FR	METAL	C	FAIR	WHITE	OUTSIDE	BLDG B	Positive	1.1
DOOR FR	METAL	C	FAIR	WHITE	OUTSIDE	BLDG B	Positive	1.1
WINDOW FR	METAL	A	POOR	WHITE	OUTSIDE	BLDG C	Positive	1.1
WINDOW FR	METAL	A	POOR	WHITE	OUTSIDE	BLDG C	Positive	1
WINDOW FR	METAL	A	POOR	WHITE	OUTSIDE	BLDG C	Positive	1.4
WINDOW	METAL	A	POOR	WHITE	OUTSIDE	BLDG C	Positive	1.3
WINDOW	METAL	A	FAIR	WHITE	OUTSIDE	BLDG C	Positive	1.3
WINDOW FR	METAL	A	FAIR	WHITE	OUTSIDE	BLDG C	Positive	1.2
WINDOW FR	METAL	C	POOR	WHITE	OUTSIDE	BLDG C	Positive	1.5
WINDOW FR	METAL	C	POOR	WHITE	OUTSIDE	BLDG C	Positive	1.3
WINDOW	METAL	C	POOR	WHITE	OUTSIDE	BLDG C	Positive	1.4
WINDOW	METAL	C	FAIR	WHITE	OUTSIDE	BLDG C	Positive	1.3
WINDOW FR	METAL	C	FAIR	WHITE	OUTSIDE	BLDG C	Positive	1.7
DOOR FR	METAL	A	FAIR	WHITE	OUTSIDE	BLDG C	Positive	1.4

Component	Substrate	Side	Condition	Color	Room	Building/Area	Results	Lead mg/cm2
DOOR JM	METAL	A	FAIR	WHITE	OUTSIDE	BLDG C	Positive	1.4
DOOR JM	METAL	C	FAIR	WHITE	OUTSIDE	BLDG C	Positive	1.5
DOOR FR	METAL	C	FAIR	WHITE	OUTSIDE	BLDG C	Positive	1.5

Please refer to the attached data tables for complete listings of all XRF readings collected from the site and positive readings. The A side noted in the tables is the front (street side) of the subject site and the B, C and D sides continue clockwise around the structures. Please refer to the recommendations in Section 4 below for additional details regarding LBP.

#### 4.0 Conclusions & Recommendations

An asbestos and lead-based paint survey of the subject site buildings has been completed per the terms of our agreement to define hazardous materials issues prior to painting/renovation activities. Based on our visual observations and our evaluation of analytical data, we conclude the following:

##### **Asbestos Results:**

- 1) Trace Asbestos Containing Materials (<1%): The following materials were tested and found to contain less than 1% chrysotile using PLM methods. These materials must be treated as asbestos containing materials (ACM) unless further analysis by more quantitative methods such as “Point Count” or transmission electron microscopy (TEM) are utilized to quantify the actual concentration of asbestos:
  - Exterior Plaster/Stucco: Located on Building A. This is a Category II, non-friable material in good to fair condition. All other buildings have wood or metal siding with no stucco or plaster.
  - Exterior Window Putty: Located on Buildings B & C, north sides. This is a Category II, non-friable material in fair to damaged condition.

##### **Asbestos Recommendations:**

- 1) There are limited areas where asbestos may be disturbed as part of the proposed exterior painting project. This may include window putty which is loose or damaged and in need of repair and exterior plaster which may be disturbed during paint preparation work. Identified asbestos containing materials (ACM) that will be disturbed as part of site renovations must be handled in accordance with applicable federal, state and local regulations, unless further testing is conducted to quantify the concentration of asbestos.
- 2) Disturbance activities should be performed only by properly trained and licensed abatement contractors using appropriate controls to prevent fiber emissions during the removal process. This may include the use of wet methods (water mist), negative pressure containment, HEPA filtration and other engineering controls to keep fibers from being dispersed in accordance with current federal, state and local regulations.

- 3) Workers performing removal should be properly protected to prevent exposure, including the use of respiratory protection with HEPA filtration, protective suits, etc. Engineering controls must be in place. Disturbance of greater than 100 sq. ft. of any ACM or ACCM must be performed by trained and licensed asbestos contractors that are currently registered with the Dept. of Occupational Safety & Health (DOSH or Cal/OSHA).
- 4) The local enforcement agency for asbestos removal projects in this area is the Ventura County Air Pollution Control District (APCD). They require notification for removal of friable, regulated asbestos containing materials in quantities which exceed 100 square feet. Regardless of the quantities found, the survey report should be submitted for their review along with any required documentation or notifications for their review and approval. They also require notification for all demolition projects, including projects where a load-bearing wall is removed. Additional permit requirements may apply from the local Building Department. We recommend that you contact the local APCD and appropriate agencies directly for further information regarding permitting and regulatory requirements.
- 5) The contractor conducting abatement work is responsible for complying with local, state and federal standards for worker protection and NESHAPS regulations regarding asbestos fiber emissions. Proper removal techniques must be followed to prevent the dissemination of asbestos fibers. Notification and permitting is typically the responsibility of the abatement contractor and/or property owner. If you would like assistance regarding these matters or would like the names of qualified contractors in your area, please feel free to contact FCG at (805) 646-1995.

**Lead Survey Results:**

- 1) The painted surfaces listed in Section 3.0 above were found to contain lead at or above the threshold level of 1.0 mg/cm<sup>2</sup> per XRF testing methodology, and therefore meet the definition of Lead Based Paint (LBP). Lead safe work practices are required under the terms of the current regulatory requirements for disturbance in the following areas:
  - Building A: White painted wood eaves, white painted metal vents, green painted wood fascia, green painted wood door frames / door jambs, white painted wood beams (east and west sides), green painted round metal posts (east and west sides).
  - Building B: White painted metal windows / window frames and white painted metal door frames / door jambs.
  - Building C: White painted metal windows / window frames and white painted metal door frames / door jambs.
- 2) Please refer to the listing of LBP materials in Section 3 above and in the XRF field readings data tables provided in the Attachments to this report for more details. The A side is Mountain View Avenue.

**Lead Recommendations:**

1. All work which will disturb lead-based paint must be conducted by trained workers using Lead Safe Work Practices. Areas of loose and flaking paint shall be scraped to an intact

condition and sealed with an approved primer or encapsulating compound. All disturbance work must include appropriate containment, wet methods and use of hand tools or similar methods that will minimize the generation of airborne dust emissions and potential lead hazards.

2. 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 paint. 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. The use of mechanical means (i.e., sanding, grinding, cutting, etc.) to remove or disturb lead paint is not recommended unless the equipment is properly equipped with HEPA exhaust and filtration or the work is conducted within full containment.
3. 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 permitted landfill. If necessary, waste characterization testing should be conducted to ensure proper handling and disposal.
4. Although some of the painted surfaces do not meet the definition of LBP, any material containing detectable amounts of lead is subject to OSHA's Lead Exposure in Construction Rule (29 CFR Part 1926). Cal/OSHA's Construction Lead Standard (Title 8, CCR, Section 1532.1) states that employers can assume that disturbance of coatings or materials shown to contain less than 0.06% lead by weight, or 600 ppm 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. Please see the attached summary of Cal-OSHA's Lead-in-Construction Standard per Title 8, California Code of Regulations, Section 1532.1.
5. Please see the attached Lead Safe Work Practices for additional information on proper handling procedures for LBP.
6. We recommend baseline soil sampling of landscaping or other surfaces around the site prior to project startup to determine pre-existing lead levels. Clearance dust wipes or verification soil samples are recommended upon completion of field work. Upon request, FCG can provide project monitoring and clearance testing services under a separate bid.

**General:** As our survey was limited to readily accessible areas, there is potential that suspect materials previously unidentified could be discovered during site renovation work. This could include suspect materials located inside walls, under floors, above ceilings, etc. 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. Asbestos was widely used until the late 1970's in thousands of building materials (i.e. joint compound, wallboard, thermal system insulation (TSI), acoustical ceiling, roofing material, etc.), making it difficult to locate all areas of ACM usage. This assessment reflects the data collected from the specific locations tested to identify Asbestos Containing Materials (ACM) in those locations and may not be all encompassing. There is always potential for asbestos containing materials to be missed due to problems with accessibility, and the broad variety of uses. 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 #17425  
CA Certified Asbestos Consultant #94-1549

Attachments:    1 – Site Plan, Asbestos Analytical Results & Bulk Sampling Log  
                         2 – Lead XRF Field Readings, Sampling Methodology and Lead Safe Work Practices  
                         3 – FCG Inspector Certifications

## Attachment 1

Site Plan with Sample Locations & LBP Noted

Laboratory Analytical Results for  
Asbestos Bulk Samples

Bulk Sample Log Sheets/Chain-of-Custody

[illegible]

← north

Blds. A

POST: HOUSE		
White wood Eaves All sides	Bldg. B white Metal windows & FR's A + C sides	Bldg. K is a portable
Green wood Fascia ↓ ↓	white Metal Door FR's + JM's A + C sides	NO LBP
Green Metal Posts B + D sides	Same Slops of Material listed above = 0.5' x 0.8'	
White wood Beams ↓ ↓	Bldg. C same as Bldg. B.	
Green wood Door FR's + JM's All sides		
Green wood Door's 0.8'		
Green wood Door Tk 0.8'	Bldg. D + E are portables	
	NO LBP	



# Bulk Asbestos Analysis

(EPA Method 40CFR, Part 763, Appendix E to Subpart E and EPA 600/R-93-116, Visual Area Estimation)

NVLAP Lab Code: 101459-1

FCG Environmental  
Alan Forbess  
1009 Mercer Avenue  
Ojai, CA 93023

**Client ID:** 7238  
**Report Number:** B274653  
**Date Received:** 03/20/19  
**Date Analyzed:** 03/20/19  
**Date Printed:** 03/20/19  
**First Reported:** 03/20/19

**Job ID/Site:** Ojai USD-50; Topa Topa ES, 916 Mountain View Ave.

**FALI Job ID:** 7238  
**Total Samples Submitted:** 9  
**Total Samples Analyzed:** 9

**Date(s) Collected:** 03/19/2019

Sample ID	Lab Number	Asbestos Type	Percent in Layer	Asbestos Type	Percent in Layer	Asbestos Type	Percent in Layer
<b>1</b>	51216154						
Layer: Grey Cementitious Material			<b>ND</b>				
Layer: Green Cementitious Material		Chrysotile	<b>Trace</b>				
Layer: Paint			<b>ND</b>				
Layer: Off-White Cementitious Material			<b>ND</b>				
Layer: Paint			<b>ND</b>				
Total Composite Values of Fibrous Components:		<b>Asbestos (Trace)</b>					
Cellulose (Trace)							
<b>2</b>	51216155						
Layer: Grey Cementitious Material			<b>ND</b>				
Layer: Green Cementitious Material		Chrysotile	<b>Trace</b>				
Layer: Paint			<b>ND</b>				
Total Composite Values of Fibrous Components:		<b>Asbestos (Trace)</b>					
Cellulose (Trace)							
<b>3</b>	51216156						
Layer: Grey Cementitious Material			<b>ND</b>				
Layer: Green Cementitious Material		Chrysotile	<b>Trace</b>				
Layer: Paint			<b>ND</b>				
Layer: Off-White Cementitious Material			<b>ND</b>				
Layer: Paint			<b>ND</b>				
Total Composite Values of Fibrous Components:		<b>Asbestos (Trace)</b>					
Cellulose (Trace)							
<b>4</b>	51216157						
Layer: Dark Grey Putty			<b>ND</b>				
Layer: Paint			<b>ND</b>				
Layer: Off-White Putty			<b>ND</b>				
Layer: Paint			<b>ND</b>				
Total Composite Values of Fibrous Components:		<b>Asbestos (ND)</b>					
Cellulose (Trace)							
<b>5</b>	51216158						
Layer: Grey Putty		Chrysotile	<b>Trace</b>				
Layer: Paint			<b>ND</b>				
Total Composite Values of Fibrous Components:		<b>Asbestos (Trace)</b>					
Cellulose (Trace)							

**Client Name:** FCG Environmental

**Report Number:** B274653

**Date Printed:** 03/20/19

Sample ID	Lab Number	Asbestos Type	Percent in Layer	Asbestos Type	Percent in Layer	Asbestos Type	Percent in Layer
<b>6</b>	51216159						
Layer: Grey Putty		Chrysotile	<b>Trace</b>				
Layer: Paint			<b>ND</b>				
Total Composite Values of Fibrous Components:		<b>Asbestos (Trace)</b>					
Cellulose (Trace)							
<b>7</b>	51216160						
Layer: Dark Grey Putty			<b>ND</b>				
Layer: Paint			<b>ND</b>				
Total Composite Values of Fibrous Components:		<b>Asbestos (ND)</b>					
Cellulose (Trace)							
<b>8</b>	51216161						
Layer: Grey Putty		Chrysotile	<b>Trace</b>				
Layer: Paint			<b>ND</b>				
Total Composite Values of Fibrous Components:		<b>Asbestos (Trace)</b>					
Cellulose (Trace)							
<b>9</b>	51216162						
Layer: Grey Putty		Chrysotile	<b>Trace</b>				
Layer: Paint			<b>ND</b>				
Total Composite Values of Fibrous Components:		<b>Asbestos (Trace)</b>					
Cellulose (Trace)							



Tiffani Ludd, Laboratory Supervisor, Rancho Dominguez Laboratory

Note: Limit of Quantification ('LOQ') = 1%. 'Trace' denotes the presence of asbestos below the LOQ. 'ND' = 'None Detected'.

Analytical results and reports are generated by Forensic Analytical Laboratories Inc. (FALI) at the request of and for the exclusive use of the person or entity (client) named on such report. Results, reports or copies of same will not be released by FALI to any third party without prior written request from client. This report applies only to the sample(s) tested. Supporting laboratory documentation is available upon request. This report must not be reproduced except in full, unless approved by FALI. The client is solely responsible for the use and interpretation of test results and reports requested from FALI. Forensic Analytical Laboratories Inc. is not able to assess the degree of hazard resulting from materials analyzed. FALI reserves the right to dispose of all samples after a period of thirty (30) days, according to all state and federal guidelines, unless otherwise specified. All samples were received in acceptable condition unless otherwise noted.



## Forensic Analytical Laboratories, Inc.

## Analysis Request Form (COF)

Client No.: 7238		PO / Job#: <i>Ojai USD-50</i> Date: <i>3-19-19</i>				
FCG Environmental (Forbess Consulting Group, Inc.) 1009 Mercer Avenue Ojai, CA 93023		Turn Around Time: <input checked="" type="checkbox"/> Same Day / <input type="checkbox"/> 1Day / <input type="checkbox"/> 2Day / <input type="checkbox"/> 3Day / <input type="checkbox"/> 4Day / <input type="checkbox"/> 5Day				
Contact: Alan Forbess, Bill Miller, Blake Forbess		<input type="checkbox"/> PCM: <input type="checkbox"/> NIOSH 7400A / <input type="checkbox"/> NIOSH 7400B <input type="checkbox"/> Rotometer				
Phone: (805) 646-1995 Fax: (805) 669-3538		<input checked="" type="checkbox"/> PLM: <input checked="" type="checkbox"/> Standard / <input type="checkbox"/> Point Count <input type="checkbox"/> 400 / <input type="checkbox"/> 1000 / <input type="checkbox"/> CARB 435				
E-mail: <a href="mailto:aforbess@fcgenviron.com">aforbess@fcgenviron.com</a> , <a href="mailto:bmiller@fcgenviron.com">bmiller@fcgenviron.com</a>		<input type="checkbox"/> TEM Air: <input type="checkbox"/> AHERA / <input type="checkbox"/> Yamate2 / <input type="checkbox"/> NIOSH 7402 <input type="checkbox"/> TEM Bulk: <input type="checkbox"/> Quantitative / <input type="checkbox"/> Qualitative / <input type="checkbox"/> Chatfield <input type="checkbox"/> TEM Water: <input type="checkbox"/> Potable / <input type="checkbox"/> Non-Potable / <input type="checkbox"/> Weight % <input type="checkbox"/> TEM Microvac: <input type="checkbox"/> Qual(+/-) / <input type="checkbox"/> D5755(str/area) / <input type="checkbox"/> D5756(str/mass)				
Site: <i>Topo Topa ES</i>		<input type="checkbox"/> IAQ Particle Identification (PLM LAB) <input type="checkbox"/> PLM Opaques/Soot <input type="checkbox"/> Particle Identification (TEM LAB) <input type="checkbox"/> Special Project				
Site Location: <i>916 Mountain View Ave</i>		Matrix: _____ Analytes: _____				
Comments: _____		Report Via: <input type="checkbox"/> Fax <input type="checkbox"/> E-Mail <input type="checkbox"/> Verbal				
Sample ID	Date / Time	Sample Location / Description	FOR AIR SAMPLES ONLY			Sample Area / Air Volume
			Type	Time On/Off	Avg. LPM	
<i>Samples 1-9</i>			<input type="checkbox"/> A			
			<input type="checkbox"/> P			
			<input type="checkbox"/> C			
			<input type="checkbox"/> A			
			<input type="checkbox"/> P			
			<input type="checkbox"/> C			
			<input type="checkbox"/> A			
			<input type="checkbox"/> P			
			<input type="checkbox"/> C			
				<input type="checkbox"/> A		
Sampled By: <i>Blake Forbess</i> Date: <i>3-19-19</i> Time: <i>2:00pm</i>						
Shipped Via: <input checked="" type="checkbox"/> Fed Ex <input type="checkbox"/> DHL <input type="checkbox"/> UPS <input type="checkbox"/> US Mail <input type="checkbox"/> Courier <input type="checkbox"/> Drop Off <input type="checkbox"/> Other: _____						
Relinquished By: <i>[Signature]</i>		Relinquished By: _____				
Date / Time: <i>3-19-19 9:00pm</i>		Date / Time: _____				
Received By: <i>[Signature]</i>		Received By: _____				
Date / Time: <i>03-20-19 10am</i>		Date / Time: _____				
Condition Acceptable? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		Condition Acceptable? <input type="checkbox"/> Yes <input type="checkbox"/> No				

# FCG Environmental

## Asbestos Bulk Sampling Field Log

Date: 3-19-19
Client: Ojai USD
Site: Topa Topa ES
Project: Ojai USD-50
Inspector(s): BRF
Area/Unit:

1 of 1

Friable: Friability Codes: N=Non-friable; F=Friable

Cond: Condition Codes: G=Good; F=Fair; P=Poor

NA=Not Analyzed

ND=Detected

N=Negative

1	Ext. Wall Plaster	Bldg. A. / East side Wall	T/O		N	F
2	↓	↓ / North side Wall	↓		↓	↓
3	↓	↓ / South side Wall	↓		↓	↓
4	Ext. Window Putty	Bldg. B. / South side Windows	All Windows		N	F
5	↓	↓ / North side / ↓ / East End	↓		N	F
6	↓	↓ / ↓ / ↓ / West End	↓		N	F
7	↓	Bldg. C. / South side Windows	↓		N	F
8	↓	↓ / North side / ↓ / East End	↓		N	P
9	↓	↓ / ↓ / ↓ / West End	↓		N	F

## Attachment 2

XRF Field Readings from Lead Based Paint Survey

XRF Sampling Methodology

Lead Safe Work Practices



**XRF Lead Table**  
**Topa Topa Elementary School – Exterior Painting Project**  
**916 Mountain Drive – Ojai, CA 93023**

Component	Substrate	Side	Condition	Color	Area	Misc 1	Results	Lead Mg/cm <sup>2</sup>
CALIBRATE							Positive	1.1
CALIBRATE							Positive	1
CALIBRATE							Positive	1
WALL	PLASTER	A	INTACT	WHITE	OUTSIDE	BLDG A	Negative	0.16
WALL	PLASTER	A	INTACT	TAN	OUTSIDE	BLDG A	Negative	0.11
WALL	PLASTER	B	INTACT	TAN	OUTSIDE	BLDG A	Negative	0.1
WALL	PLASTER	B	INTACT	WHITE	OUTSIDE	BLDG A	Negative	0.05
WALL	PLASTER	C	INTACT	WHITE	OUTSIDE	BLDG A	Negative	0.08
WALL	PLASTER	C	INTACT	TAN	OUTSIDE	BLDG A	Negative	-0.05
WALL	PLASTER	D	INTACT	TAN	OUTSIDE	BLDG A	Negative	0.06
WALL	PLASTER	D	INTACT	WHITE	OUTSIDE	BLDG A	Negative	0.08
WINDOW	METAL	A	INTACT	ALUM	OUTSIDE	BLDG A	Negative	0
WINDOW	METAL	A	INTACT	ALUM	OUTSIDE	BLDG A	Negative	0
DOOR	WOOD	A	INTACT	GREEN	OUTSIDE	BLDG A	Negative	0.19
DOOR FR	WOOD	A	INTACT	GREEN	OUTSIDE	BLDG A	Positive	1.9
DOOR	WOOD	A	INTACT	GREEN	OUTSIDE	BLDG A	Negative	0.19
DOOR TR	WOOD	A	INTACT	GREEN	OUTSIDE	BLDG A	Negative	0.4
TRANSOM PANEL	WOOD	A	INTACT	WHITE	OUTSIDE	BLDG A	Negative	0.11
VENT	METAL	A	INTACT	WHITE	OUTSIDE	BLDG A	Positive	7.4
EAVE	WOOD	A	POOR	WHITE	OUTSIDE	BLDG A	Positive	9.2
EAVE	WOOD	B	POOR	WHITE	OUTSIDE	BLDG A	Positive	8.4
EAVE	WOOD	C	POOR	WHITE	OUTSIDE	BLDG A	Positive	7.2
EAVE	WOOD	D	POOR	WHITE	OUTSIDE	BLDG A	Positive	7.3
FASCIA	WOOD	A	CHALKING	GREEN	OUTSIDE	BLDG A	Positive	9.8
FASCIA	WOOD	B	CHALKING	GREEN	OUTSIDE	BLDG A	Positive	8.2
FASCIA	WOOD	C	CHALKING	GREEN	OUTSIDE	BLDG A	Positive	7.2
FASCIA	WOOD	D	CHALKING	GREEN	OUTSIDE	BLDG A	Positive	8.9
RAIN GUTTER	METAL	A	INTACT	GREEN	OUTSIDE	BLDG A	Negative	0

## XRF Lead Table (Continued)

Topa Topa Elementary School  
Exterior Painting Project

Component	Substrate	Side	Condition	Color	Area	Misc 1	Results	Lead Mg/cm <sup>2</sup>
RAIN GUTTER	METAL	C	INTACT	GREEN	OUTSIDE	BLDG A	Negative	0
DOWNSPOUT	METAL	A	INTACT	GREEN	OUTSIDE	BLDG A	Negative	0
DOOR	WOOD	A	INTACT	GREEN	OUTSIDE	BLDG A	Negative	0.09
DOOR	WOOD	A	INTACT	GREEN	OUTSIDE	BLDG A	Negative	0.16
DOOR	METAL	B	INTACT	GREEN	OUTSIDE	BLDG A	Negative	0
DOOR FR	METAL	B	INTACT	GREEN	OUTSIDE	BLDG A	Negative	0
DOOR FR	WOOD	B	INTACT	GREEN	OUTSIDE	BLDG A	Positive	1.6
DOOR TR	WOOD	B	INTACT	GREEN	OUTSIDE	BLDG A	Negative	0.7
DOOR TR	WOOD	B	INTACT	GREEN	OUTSIDE	BLDG A	Negative	0.2
DOOR	WOOD	B	INTACT	GREEN	OUTSIDE	BLDG A	Negative	0.26
POST	METAL	B	FAIR	GREEN	OUTSIDE	BLDG A	Positive	4.7
BEAM	WOOD	B	INTACT	WHITE	OUTSIDE	BLDG A	Positive	11.8
DOOR	WOOD	C	INTACT	GREEN	OUTSIDE	BLDG A	Negative	0.16
DOOR FR	WOOD	C	INTACT	GREEN	OUTSIDE	BLDG A	Positive	2
DOOR TR	WOOD	C	INTACT	GREEN	OUTSIDE	BLDG A	Negative	0.5
VENT	METAL	C	POOR	WHITE	OUTSIDE	BLDG A	Positive	4.7
POST	METAL	D	FAIR	GREEN	OUTSIDE	BLDG A	Positive	6.1
BEAM	WOOD	D	INTACT	WHITE	OUTSIDE	BLDG A	Positive	5.8
FASCIA	WOOD	D	POOR	GREEN	OUTSIDE	BLDG A	Positive	4.8
FLASHING	METAL	D	POOR	GREEN	OUTSIDE	BLDG A	Negative	0.14
DOOR	WOOD	D	POOR	GREEN	OUTSIDE	BLDG A	Negative	0.11
DOOR FR	WOOD	D	POOR	GREEN	OUTSIDE	BLDG A	Positive	1.3
DOOR TR	WOOD	D	POOR	GREEN	OUTSIDE	BLDG A	Positive	1.3
DOOR JM	WOOD	D	POOR	GREEN	OUTSIDE	BLDG A	Positive	1.2
TRANSOM PANEL	WOOD	D	INTACT	WHITE	OUTSIDE	BLDG A	Negative	0.28
VENT	METAL	D	POOR	WHITE	OUTSIDE	BLDG A	Positive	8.5
WALL	METAL	A	FAIR	WHITE	OUTSIDE	BLDG B	Negative	0.03
WALL	METAL	A	FAIR	TAN	OUTSIDE	BLDG B	Negative	0.01
EAVES	METAL	A	POOR	WHITE	OUTSIDE	BLDG B	Negative	0.01

## XRF Lead Table (Continued)

Topa Topa Elementary School  
Exterior Painting Project

Component	Substrate	Side	Condition	Color	Area	Misc 1	Results	Lead Mg/cm <sup>2</sup>
FASCIA	METAL	A	CHALKING	GREEN	OUTSIDE	BLDG B	Negative	0.01
I-BEAMS	METAL	A	INTACT	WHITE	OUTSIDE	BLDG B	Negative	0.02
WINDOW	METAL	A	FAIR	WHITE	OUTSIDE	BLDG B	Negative	0.5
WINDOW FR	METAL	A	FAIR	WHITE	OUTSIDE	BLDG B	Negative	0.28
DOOR	METAL	A	FAIR	GREEN	OUTSIDE	BLDG B	Negative	0.19
DOOR FR	METAL	A	FAIR	WHITE	OUTSIDE	BLDG B	Positive	1.3
DOOR JM	METAL	A	FAIR	WHITE	OUTSIDE	BLDG B	Positive	1.1
WALL	METAL	B	FAIR	WHITE	OUTSIDE	BLDG B	Negative	0.04
WALL	METAL	B	FAIR	TAN	OUTSIDE	BLDG B	Negative	0.06
FASCIA	METAL	B	FAIR	GREEN	OUTSIDE	BLDG B	Negative	0.04
FASCIA	METAL	B	POOR	GREEN	OUTSIDE	BLDG B	Negative	0
EAVES	METAL	B	POOR	WHITE	OUTSIDE	BLDG B	Negative	0.04
EAVES	METAL	C	POOR	WHITE	OUTSIDE	BLDG B	Negative	0.06
FASCIA	METAL	C	POOR	GREEN	OUTSIDE	BLDG B	Negative	0.06
WALL	METAL	C	FAIR	WHITE	OUTSIDE	BLDG B	Negative	0.01
WALL	METAL	C	FAIR	TAN	OUTSIDE	BLDG B	Negative	0.01
WINDOW	METAL	C	POOR	WHITE	OUTSIDE	BLDG B	Positive	1
WINDOW	METAL	C	POOR	WHITE	OUTSIDE	BLDG B	Negative	0.7
WINDOW FR	METAL	C	FAIR	WHITE	OUTSIDE	BLDG B	Positive	1.1
WINDOW FR	METAL	C	FAIR	WHITE	OUTSIDE	BLDG B	Negative	0.5
DOOR	METAL	C	FAIR	GREEN	OUTSIDE	BLDG B	Negative	0.04
DOOR FR	METAL	C	FAIR	WHITE	OUTSIDE	BLDG B	Negative	0.8
DOOR FR	METAL	C	FAIR	WHITE	OUTSIDE	BLDG B	Positive	1.1
DOOR JM	METAL	C	FAIR	WHITE	OUTSIDE	BLDG B	Negative	0.18
DOOR JM	METAL	C	FAIR	WHITE	OUTSIDE	BLDG B	Negative	0.9
DOOR JM	METAL	C	FAIR	WHITE	OUTSIDE	BLDG B	Negative	0.6
DOOR FR	METAL	D	INTACT	GREEN	OUTSIDE	BLDG B	Negative	0
DOOR JM	METAL	D	INTACT	GREEN	OUTSIDE	BLDG B	Negative	0
DOOR	METAL	D	INTACT	GREEN	OUTSIDE	BLDG B	Negative	0

## XRF Lead Table (Continued)

Topa Topa Elementary School  
Exterior Painting Project

Component	Substrate	Side	Condition	Color	Area	Misc 1	Results	Lead Mg/cm <sup>2</sup>
WALL	METAL	D	FAIR	WHITE	OUTSIDE	BLDG B	Negative	0
WALL	METAL	D	FAIR	TAN	OUTSIDE	BLDG B	Negative	0.01
CEILING	METAL	D	POOR	TAN	OUTSIDE	BLDG B COVERED WALKWAY	Negative	0.02
POST	METAL	D	FAIR	GREEN	OUTSIDE	BLDG B COVERED WALKWAY	Negative	0
BEAM	METAL	D	INTACT	WHITE	OUTSIDE	BLDG B COVERED WALKWAY	Negative	0
WALL	METAL	A	FAIR	WHITE	OUTSIDE	BLDG C	Negative	0.02
WALL	METAL	A	FAIR	TAN	OUTSIDE	BLDG C	Negative	0.03
WINDOW	METAL	A	POOR	WHITE	OUTSIDE	BLDG C	Negative	0.19
WINDOW	METAL	A	POOR	WHITE	OUTSIDE	BLDG C	Negative	0.29
WINDOW	METAL	A	POOR	WHITE	OUTSIDE	BLDG C	Negative	0.3
WINDOW FR	METAL	A	POOR	WHITE	OUTSIDE	BLDG C	Positive	1.1
WINDOW FR	METAL	A	POOR	WHITE	OUTSIDE	BLDG C	Positive	1
WINDOW FR	METAL	A	POOR	WHITE	OUTSIDE	BLDG C	Negative	0.7
WINDOW FR	METAL	A	POOR	WHITE	OUTSIDE	BLDG C	Positive	1.4
WINDOW	METAL	A	POOR	WHITE	OUTSIDE	BLDG C	Positive	1.3
WINDOW	METAL	A	FAIR	WHITE	OUTSIDE	BLDG C	Positive	1.3
WINDOW FR	METAL	A	FAIR	WHITE	OUTSIDE	BLDG C	Positive	1.2
WINDOW FR	METAL	C	POOR	WHITE	OUTSIDE	BLDG C	Positive	1.5
WINDOW FR	METAL	C	POOR	WHITE	OUTSIDE	BLDG C	Positive	1.3
WINDOW	METAL	C	POOR	WHITE	OUTSIDE	BLDG C	Negative	0.8
WINDOW	METAL	C	POOR	WHITE	OUTSIDE	BLDG C	Positive	1.4
WINDOW	METAL	C	FAIR	WHITE	OUTSIDE	BLDG C	Positive	1.3
WINDOW FR	METAL	C	FAIR	WHITE	OUTSIDE	BLDG C	Positive	1.7
DOOR FR	METAL	A	FAIR	WHITE	OUTSIDE	BLDG C	Positive	1.4
DOOR JM	METAL	A	FAIR	WHITE	OUTSIDE	BLDG C	Positive	1.4
DOOR JM	METAL	C	FAIR	WHITE	OUTSIDE	BLDG C	Positive	1.5
DOOR FR	METAL	C	FAIR	WHITE	OUTSIDE	BLDG C	Positive	1.5
DOOR	METAL	A	FAIR	GREEN	OUTSIDE	BLDG C	Negative	0.08
I-BEAMS	METAL	A	INTACT	WHITE	OUTSIDE	BLDG C	Negative	0.13

## XRF Lead Table (Continued)

Topa Topa Elementary School  
Exterior Painting Project

Component	Substrate	Side	Condition	Color	Area	Misc 1	Results	Lead Mg/cm <sup>2</sup>
I-BEAMS	METAL	A	INTACT	WHITE	OUTSIDE	BLDG C	Negative	0.24
I-BEAMS	METAL	A	INTACT	WHITE	OUTSIDE	BLDG C	Negative	0.24
EAVES	METAL	A	POOR	WHITE	OUTSIDE	BLDG C	Negative	0.01
EAVES	METAL	A	POOR	WHITE	OUTSIDE	BLDG C	Negative	0
FASCIA	METAL	A	POOR	GREEN	OUTSIDE	BLDG C	Negative	0.03
FASCIA	METAL	B	CHALKING	GREEN	OUTSIDE	BLDG C	Negative	0.01
WALL	METAL	B	FAIR	WHITE	OUTSIDE	BLDG C	Negative	0.05
WALL	PLASTER	A	INTACT	WHITE	OUTSIDE	BLDG C STORAGE SHED	Negative	0.01
WALL	PLASTER	B	INTACT	WHITE	OUTSIDE	BLDG C STORAGE SHED	Negative	0
WALL	PLASTER	C	INTACT	WHITE	OUTSIDE	BLDG C STORAGE SHED	Negative	0
WALL	PLASTER	C	INTACT	WHITE	OUTSIDE	BLDG C STORAGE SHED	Negative	0
DOOR	WOOD	A	POOR	GREEN	OUTSIDE	BLDG C STORAGE SHED	Negative	0
DOOR FR	WOOD	A	POOR	GREEN	OUTSIDE	BLDG C STORAGE SHED	Negative	0
EAVES	WOOD	A	FAIR	WHITE	OUTSIDE	BLDG C STORAGE SHED	Negative	0
RAFTER TAILS	WOOD	A	POOR	WHITE	OUTSIDE	BLDG C STORAGE SHED	Negative	0
FASCIA	WOOD	A	POOR	GREEN	OUTSIDE	BLDG C STORAGE SHED	Negative	0
WALL	METAL	C	FAIR	WHITE	OUTSIDE	BLDG C	Negative	0.06
WALL	METAL	C	FAIR	TAN	OUTSIDE	BLDG C	Negative	0.1
WALL	METAL	D	FAIR	TAN	OUTSIDE	BLDG C	Negative	0
WALL	METAL	D	FAIR	WHITE	OUTSIDE	BLDG C	Negative	0
DOOR	METAL	D	FAIR	GREEN	OUTSIDE	BLDG C	Negative	0
DOOR FR	METAL	D	FAIR	GREEN	OUTSIDE	BLDG C	Negative	0
CEILING	METAL	D	FAIR	WHITE	OUTSIDE	BLDG C COVERED WALKWAY	Negative	0.1
CEILING	METAL	D	FAIR	WHITE	OUTSIDE	BLDG C COVERED WALKWAY	Negative	0.03
BEAM	METAL	D	INTACT	WHITE	OUTSIDE	BLDG C COVERED WALKWAY	Negative	0
POST	METAL	D	FAIR	GREEN	OUTSIDE	BLDG C COVERED WALKWAY	Negative	0
WALL	WOOD	D	INTACT	WHITE	OUTSIDE	BLDG D PORTABLE	Negative	0
WALL	WOOD	A	INTACT	WHITE	OUTSIDE	BLDG D PORTABLE	Negative	0
WALL	WOOD	B	FAIR	WHITE	OUTSIDE	BLDG D PORTABLE	Negative	0

## XRF Lead Table (Continued)

Topa Topa Elementary School  
Exterior Painting Project

Component	Substrate	Side	Condition	Color	Area	Misc 1	Results	Lead Mg/cm <sup>2</sup>
WALL	WOOD	C	FAIR	WHITE	OUTSIDE	BLDG D PORTABLE	Negative	0
WALL	WOOD	D	POOR	WHITE	OUTSIDE	BLDG D PORTABLE	Negative	0
WALL	WOOD	D	POOR	TAN	OUTSIDE	BLDG D PORTABLE	Negative	0
WALL	WOOD	A	FAIR	TAN	OUTSIDE	BLDG D PORTABLE	Negative	0
WALL	WOOD	B	FAIR	TAN	OUTSIDE	BLDG D PORTABLE	Negative	0
WALL	WOOD	C	FAIR	TAN	OUTSIDE	BLDG D PORTABLE	Negative	0
DOOR	METAL	A	INTACT	GREEN	OUTSIDE	BLDG D PORTABLE	Negative	0
DOOR FR	METAL	A	INTACT	GREEN	OUTSIDE	BLDG D PORTABLE	Negative	0.01
DOOR TR	WOOD	A	INTACT	GREEN	OUTSIDE	BLDG D PORTABLE	Negative	0
WINDOW	METAL	A	INTACT	BLK	OUTSIDE	BLDG D PORTABLE	Negative	0
WINDOW FR	METAL	A	INTACT	BLK	OUTSIDE	BLDG D PORTABLE	Negative	0
WINDOW TR	METAL	A	INTACT	WHITE	OUTSIDE	BLDG D PORTABLE	Negative	0
WINDOW TR	METAL	A	POOR	TAN	OUTSIDE	BLDG D PORTABLE	Negative	0
RAMP RAIL	METAL	A	POOR	GREEN	OUTSIDE	BLDG D PORTABLE	Negative	0.06
EAVES	WOOD	A	POOR	WHITE	OUTSIDE	BLDG D PORTABLE	Negative	0
RAFTER TAILS	METAL	A	INTACT	WHITE	OUTSIDE	BLDG D PORTABLE	Negative	0
FASCIA	METAL	A	CHALKING	GREEN	OUTSIDE	BLDG D PORTABLE	Negative	0
FASCIA	METAL	B	POOR	GREEN	OUTSIDE	BLDG D PORTABLE	Negative	0
FASCIA	METAL	C	POOR	GREEN	OUTSIDE	BLDG D PORTABLE	Negative	0
FASCIA	METAL	D	POOR	GREEN	OUTSIDE	BLDG D PORTABLE	Negative	0
EAVES	WOOD	C	POOR	WHITE	OUTSIDE	BLDG D PORTABLE	Negative	0
DOWNSPOUT	METAL	A	FAIR	WHITE	OUTSIDE	BLDG D PORTABLE	Negative	0
RAIN GUTTER	METAL	A	POOR	GREEN	OUTSIDE	BLDG D PORTABLE	Negative	0.01
WALL	WOOD	A	INTACT	WHITE	OUTSIDE	BLDG E RMS25&26 PORTABLE	Negative	0
WALL	WOOD	B	INTACT	WHITE	OUTSIDE	BLDG E RMS25&26 PORTABLE	Negative	0
WALL	WOOD	C	INTACT	WHITE	OUTSIDE	BLDG E RMS25&26 PORTABLE	Negative	0
WALL	WOOD	D	INTACT	WHITE	OUTSIDE	BLDG E RMS25&26 PORTABLE	Negative	0
WALL	WOOD	D	INTACT	TAN	OUTSIDE	BLDG E RMS25&26 PORTABLE	Negative	0
WALL	WOOD	A	INTACT	TAN	OUTSIDE	BLDG E RMS25&26 PORTABLE	Negative	0

## XRF Lead Table (Continued)

Topa Topa Elementary School  
Exterior Painting Project

Component	Substrate	Side	Condition	Color	Area	Misc 1	Results	Lead Mg/cm <sup>2</sup>
WALL	WOOD	B	INTACT	TAN	OUTSIDE	BLDG E RMS25&26 PORTABLE	Negative	0
WALL	WOOD	C	INTACT	TAN	OUTSIDE	BLDG E RMS25&26 PORTABLE	Negative	0
EAVES	WOOD	A	INTACT	WHITE	OUTSIDE	BLDG E RMS25&26 PORTABLE	Negative	0
FRAME	METAL	A	INTACT	WHITE	OUTSIDE	BLDG E RMS25&26 PORTABLE	Negative	0
FASCIA	METAL	A	FAIR	BLUE	OUTSIDE	BLDG E RMS25&26 PORTABLE	Negative	0
DOOR	METAL	A	INTACT	GREEN	OUTSIDE	BLDG E RMS25&26 PORTABLE	Negative	0
DOOR FR	METAL	A	INTACT	GREEN	OUTSIDE	BLDG E RMS25&26 PORTABLE	Negative	0
DOOR	WOOD	A	INTACT	GREEN	OUTSIDE	BLDG E RMS25&26 PORTABLE	Negative	0
WINDOW	METAL	A	INTACT	ALUM	OUTSIDE	BLDG E RMS25&26 PORTABLE	Negative	0
WINDOW	METAL	A	INTACT	ALUM	OUTSIDE	BLDG E RMS27&28	Negative	0
DOOR	METAL	A	INTACT	GREEN	OUTSIDE	BLDG E RMS27&28	Negative	0
DOOR FR	METAL	A	INTACT	GREEN	OUTSIDE	BLDG E RMS27&28	Negative	0
DOOR TR	WOOD	A	INTACT	BLUE	OUTSIDE	BLDG E RMS27&28	Negative	0
WALL	WOOD	A	INTACT	WHITE	OUTSIDE	BLDG E RMS27&28	Negative	0
WALL	WOOD	A	INTACT	TAN	OUTSIDE	BLDG E RMS27&28	Negative	0
EAVES	WOOD	A	INTACT	WHITE	OUTSIDE	BLDG E RMS27&28	Negative	0
FRAME	DRYWALL	A	INTACT	WHITE	OUTSIDE	BLDG E RMS27&28	Negative	0
FASCIA	METAL	A	INTACT	BLUE	OUTSIDE	BLDG E RMS27&28	Negative	0
FASCIA	METAL	A	INTACT	GREEN	OUTSIDE	BLDG K	Negative	0
RAIN GUTTER	METAL	A	POOR	GREEN	OUTSIDE	BLDG K	Negative	0
EAVES	WOOD	A	INTACT	WHITE	OUTSIDE	BLDG K	Negative	0
DOWNSPOUT	WOOD	A	INTACT	WHITE	OUTSIDE	BLDG K	Negative	0
FRAME	METAL	A	INTACT	WHITE	OUTSIDE	BLDG K	Negative	0
FRAME	METAL	C	INTACT	WHITE	OUTSIDE	BLDG K	Negative	0
WALL	WOOD	A	INTACT	WHITE	OUTSIDE	BLDG K	Negative	0
WALL	WOOD	B	INTACT	WHITE	OUTSIDE	BLDG K	Negative	0
WALL	WOOD	C	INTACT	WHITE	OUTSIDE	BLDG K	Negative	0
WALL	WOOD	D	INTACT	WHITE	OUTSIDE	BLDG K	Negative	0
WALL	WOOD	A	INTACT	TAN	OUTSIDE	BLDG K	Negative	0

**XRF Lead Table (Continued)**

**Topa Topa Elementary School  
Exterior Painting Project**

Component	Substrate	Side	Condition	Color	Area	Misc 1	Results	Lead Mg/cm <sup>2</sup>
WALL	WOOD	B	INTACT	TAN	OUTSIDE	BLDG K	Negative	0
WALL	WOOD	C	INTACT	TAN	OUTSIDE	BLDG K	Negative	0
WALL	WOOD	D	INTACT	TAN	OUTSIDE	BLDG K	Negative	0
DOOR	METAL	A	INTACT	GREEN	OUTSIDE	BLDG K	Negative	0
DOOR FR	METAL	A	INTACT	GREEN	OUTSIDE	BLDG K	Negative	0
DOOR JM	WOOD	A	INTACT	GREEN	OUTSIDE	BLDG K	Negative	0
WINDOW	METAL	A	INTACT	ALUM	OUTSIDE	BLDG K	Negative	0
CALIBRATE							Positive	1
CALIBRATE							Positive	1
CALIBRATE							Positive	1



**XRF Lead Table – Positive Readings**  
**Topa Topa Elementary School – Exterior Painting Project**  
**916 Mountain Drive – Ojai, CA 93023**

Component	Substrate	Side	Condition	Color	Area	Misc 1	Results	Lead Mg/cm <sup>2</sup>
DOOR FR	WOOD	A	INTACT	GREEN	OUTSIDE	BLDG A	Positive	1.9
VENT	METAL	A	INTACT	WHITE	OUTSIDE	BLDG A	Positive	7.4
EAVE	WOOD	A	POOR	WHITE	OUTSIDE	BLDG A	Positive	9.2
EAVE	WOOD	B	POOR	WHITE	OUTSIDE	BLDG A	Positive	8.4
EAVE	WOOD	C	POOR	WHITE	OUTSIDE	BLDG A	Positive	7.2
EAVE	WOOD	D	POOR	WHITE	OUTSIDE	BLDG A	Positive	7.3
FASCIA	WOOD	A	CHALKING	GREEN	OUTSIDE	BLDG A	Positive	9.8
FASCIA	WOOD	B	CHALKING	GREEN	OUTSIDE	BLDG A	Positive	8.2
FASCIA	WOOD	C	CHALKING	GREEN	OUTSIDE	BLDG A	Positive	7.2
FASCIA	WOOD	D	CHALKING	GREEN	OUTSIDE	BLDG A	Positive	8.9
DOOR FR	WOOD	B	INTACT	GREEN	OUTSIDE	BLDG A	Positive	1.6
POST	METAL	B	FAIR	GREEN	OUTSIDE	BLDG A	Positive	4.7
BEAM	WOOD	B	INTACT	WHITE	OUTSIDE	BLDG A	Positive	11.8
DOOR FR	WOOD	C	INTACT	GREEN	OUTSIDE	BLDG A	Positive	2
VENT	METAL	C	POOR	WHITE	OUTSIDE	BLDG A	Positive	4.7
POST	METAL	D	FAIR	GREEN	OUTSIDE	BLDG A	Positive	6.1
BEAM	WOOD	D	INTACT	WHITE	OUTSIDE	BLDG A	Positive	5.8
FASCIA	WOOD	D	POOR	GREEN	OUTSIDE	BLDG A	Positive	4.8
DOOR FR	WOOD	D	POOR	GREEN	OUTSIDE	BLDG A	Positive	1.3
DOOR TR	WOOD	D	POOR	GREEN	OUTSIDE	BLDG A	Positive	1.3
DOOR JM	WOOD	D	POOR	GREEN	OUTSIDE	BLDG A	Positive	1.2
VENT	METAL	D	POOR	WHITE	OUTSIDE	BLDG A	Positive	8.5
DOOR FR	METAL	A	FAIR	WHITE	OUTSIDE	BLDG B	Positive	1.3
DOOR JM	METAL	A	FAIR	WHITE	OUTSIDE	BLDG B	Positive	1.1
WINDOW	METAL	C	POOR	WHITE	OUTSIDE	BLDG B	Positive	1
WINDOW FR	METAL	C	FAIR	WHITE	OUTSIDE	BLDG B	Positive	1.1
DOOR FR	METAL	C	FAIR	WHITE	OUTSIDE	BLDG B	Positive	1.1
WINDOW FR	METAL	A	POOR	WHITE	OUTSIDE	BLDG C	Positive	1.1

**XRF Lead Table – Positive Readings (Continued)**

**Topa Topa Elementary School  
Exterior Painting Project**

<b>Component</b>	<b>Substrate</b>	<b>Side</b>	<b>Condition</b>	<b>Color</b>	<b>Area</b>	<b>Misc 1</b>	<b>Results</b>	<b>Lead Mg/cm<sup>2</sup></b>
WINDOW FR	METAL	A	POOR	WHITE	OUTSIDE	BLDG C	Positive	1
WINDOW FR	METAL	A	POOR	WHITE	OUTSIDE	BLDG C	Positive	1.4
WINDOW	METAL	A	POOR	WHITE	OUTSIDE	BLDG C	Positive	1.3
WINDOW	METAL	A	FAIR	WHITE	OUTSIDE	BLDG C	Positive	1.3
WINDOW FR	METAL	A	FAIR	WHITE	OUTSIDE	BLDG C	Positive	1.2
WINDOW FR	METAL	C	POOR	WHITE	OUTSIDE	BLDG C	Positive	1.5
WINDOW FR	METAL	C	POOR	WHITE	OUTSIDE	BLDG C	Positive	1.3
WINDOW	METAL	C	POOR	WHITE	OUTSIDE	BLDG C	Positive	1.4
WINDOW	METAL	C	FAIR	WHITE	OUTSIDE	BLDG C	Positive	1.3
WINDOW FR	METAL	C	FAIR	WHITE	OUTSIDE	BLDG C	Positive	1.7
DOOR FR	METAL	A	FAIR	WHITE	OUTSIDE	BLDG C	Positive	1.4
DOOR JM	METAL	A	FAIR	WHITE	OUTSIDE	BLDG C	Positive	1.4
DOOR JM	METAL	C	FAIR	WHITE	OUTSIDE	BLDG C	Positive	1.5
DOOR FR	METAL	C	FAIR	WHITE	OUTSIDE	BLDG C	Positive	1.5

**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 insure 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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## 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	40 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.



## Attachment 3

### FCG Inspector Certifications

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

**William A Miller**



Name

Certification No. **07-4160**

Expires on **03/22/17**

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

Certificate  
Type

Expiration  
Date



**Sampling Technician 10/31/2017**



**Blake R. Forbess**

**ID #: 28474**