FINBACK670

Lead-based Paint Survey and Risk Assessment

YOURLOGO

Account ID 101042

4 DELAWARE ST
BATON ROUGE, LA 70805

Date of Construction: pre-1978
Final Field Assessment Date: 07/05/2017

Summary of Findings

Number of Units Evaluated:	1
Total Number of Units:	1
Lead-based Paint:	Yes
Lead-based Paint in Locations of Deteriorated Paint:	Yes
Lead-based Paint Hazards (Soil-lead or Dust-lead):	Yes

Applicant

LINDA SMITH
4 DELAWARE ST
BATON ROUGE, LA 70805
555.555.5555 phone

Damaged Address

4 DELAWARE ST
BATON ROUGE, LA 70805

Submitted by

ACE
10 Jefferson Highway
Baton Rouge, LA 70809
555.555.5555 phone
555.555.5555 fax

Submitted to

State of Louisiana
Office of Community Development
1201 North Third Street
Suite 7 - 210
Baton Rouge, LA 70802

Field Accredited Lead Risk Assessor

Jerry Thomas — 7/9/2017 Issuance

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Table of Contents

RIGHT OF ENTRY (ROE) PERMIT	
Application Number	101042
Applicant Name	LINDA SMITH
Homeowner Name	LINDA SMITH
Co-owner, if applicable	None Provided
Property Address	4 DELAWARE ST
City	BATON ROUGE
Zip Code	70805
Parish	East Baton Rouge
Flood Event	See Below
Contact Number	5555555555
Mailing Address	4 DELAWARE ST, BATON ROUGE, LA 70805
Structure Type	Residential
Email	Not on File

The undersigned, ("Homeowner"), hereby unconditionally authorizes the State/Prime, and their respective assigns, employees, agents, and contractors (collectively, the "Assistance Providers") to have the right of access and to enter in and onto the property described above ("the Property") for the purpose of performing inspections and/or construction activities resulting from the declared flooding March 2016 (Disaster Number/DR-4263) and August 2016 (Disaster Number/DR-4277) for purposes of participating in the Program. It is fully understood that this Right of Entry Permit (ROE) does not create any obligation on the part of the Assistance Providers to perform inspections or undertake construction activities on the Property. Homeowner understands that no inspection or construction activities will be performed until this form is signed.

1. Term: The ROE shall expire at termination of the Grant Agreement unless cancelled by either party prior to the termination of the Grant Agreement according to the terms herein.
2. Inspection and Construction Activities Authorized: The ROE authorizes inspection and construction activities on the Property. Homeowner understands that the Assistance Providers shall, in their sole discretion, determine the extent of the damage to the Property and the Scope of Work to be conducted by contractors under the Grant Agreement. If Homeowner disagrees with the nature or extent of proposed actions, Homeowner may refuse any additional work and cancel this ROE at any time on the provided form labeled "Right-of-Entry Permit – Request for Cancelation."
3. Site Ready, No Interference and Removal of Obstructions. Upon the signing of this Agreement, Homeowner will remove all personal property and valuables such as furniture, jewelry, heirlooms and cash from the Property ("personal property") prior to the commencement of construction. Homeowner also agrees to cooperate with the State/Prime/Assistance Providers and will not interfere with inspection and construction activities on the Property. To the extent that there are debris, refuse, garbage or other obstructions located on the property that will interfere with inspection or construction activities, Homeowner agrees to remove such items at their own expense within ten (10) days of the date of written notice by the State/Prime/Assistance Providers requesting removal.

4. Assistance Providers Held Harmless: The Homeowner acknowledges that the Government's decisions on whether, when, where, and how to provide disaster relief to Homeowner's property are discretionary functions. Assistance Providers shall not be liable for any claim based upon the exercise or performance of or the failure to exercise or perform a discretionary function or duty on the part of any agency or an employee of any agency in carrying out inspections or construction activities related to the Program. Additionally, the undersigned will indemnify and hold harmless all Assistance Providers listed above for any and all liability, loss, damage, or destruction of any type whatsoever to the above described property or to personal property and fixtures situated thereon, or for bodily injury or death to persons on the property, and hereby releases, discharges and waives any and all liability, claims, demands, damages, injuries, losses, penalties, fines, costs, causes of action, judgments, expenses, as well as any and all actions, either legal or equitable, which the undersigned has, or that might arise, of any nature whatsoever and by whomever made, or may have, by reason of or incident to any action of aforesaid Assistance Providers taken to accomplish the aforementioned purpose. The Homeowner agrees that the State of Louisiana, along with its contractors, in accordance with LA RS 29:735, are indemnified and will be held harmless from any death of or any injury to persons or damage to property as a result of actions taken pursuant to the Program.

5. Miscellaneous:
   a. Homeowner represents and warrants that Homeowner has full power and authority to execute and fully perform Homeowner's obligations under this ROE. Homeowner also represents and warrants that he/she is authorized to act on behalf of anyone who might otherwise have an interest in the Property.

   b. This ROE includes the right of ingress and egress on other lands of the Homeowner not described above, provided such ingress and egress is necessary and access to the Property is not otherwise conveniently available to the Assistance Providers. All tools, equipment, and other property taken upon or placed upon the property by the Assistance Providers shall remain the property of the Assistance Providers and may be removed by the Assistance Providers at any time within a reasonable period after the expiration of this ROE, if necessary.

   c. Homeowner understands that any individual who fraudulently or willfully misstates any fact in connection with this ROE shall be subject to legal addition, and the Homeowner understands that any individual who fraudulently or willfully misstates any fact in connection with this ROE shall be subject to a repayment of funds to the State of Louisiana.

6. Privacy Act Statement: The Property Homeowner/Homeowner's Authorized Legal Representative acknowledge(s) that information submitted will be shared with other government agencies, federal and nonfederal, and contractors, their subcontractors and employees for purposes of disaster relief management and for the objectives of this Right of Entry.

HOMEOWNER: Linda Smith
DATE: 7/5/2017

Section 1: Executive Summary

1.1 Introduction

ACE ("Consultant") contracted with State of Louisiana Office of Community Development (“Client") to conduct this Lead-Based Paint Survey and Risk Assessment ("Evaluation") of 4354 DELAWARE ST, BATON ROUGE, Louisiana ("Job Site"). The final field portion of the Evaluation was concluded on 07/05/2017.

The purpose of this Evaluation is limited to providing the Client a report concerning lead-based paint, and/or lead-based paint hazards specified in the Evaluation, and evident at the Job Site at the time of the Evaluation. It is the Consultant's and their Subcontractor's understanding that the Client will utilize this Evaluation solely to make a determination as to the regulatory levels of lead-based paint and/or lead-based paint hazards.

Client understands that the actual lead-based paint testing is not 100% and that all testing/sampling is conducted on a representative sample selection basis in accordance with United States Department of Housing and Urban Development Guidelines for the Evaluation and Control of Lead-Based Paint Hazards in Housing, Chapter 7 Lead-Based Paint Inspection, 2012 Edition (or updated).

This Evaluation may be used to prepare cost estimates. The Consultant does not assume responsibility for the discovery and elimination of potential hazards that could cause accidents, injuries, or damage. This Evaluation includes conditions, operations, and practices as observed during the Evaluation. Changes, procedural modifications, or facility renovations made after the Evaluation are not included.

The Evaluation contains independent conclusions and recommendations representing the Consultant's and their Subcontractor's best professional judgment based on information and data available during the course of this Evaluation. Factual information regarding operations, conditions, and test data provided by the Client or its representative has been assumed to be correct and complete. Since the facts included in this report are subject to professional interpretation, various conclusions could result. Additionally, the conclusions and recommendations presented are based on the conditions that existed on the date of the Evaluation. If the recommendations presented are not implemented within a reasonable period of time, future conditions could occur which would alter the conclusions and recommendations of this report.

Because of the nature of the assignment, this report should not be used for any purpose other than that indicated. Any (i) application, and/or use of the information and recommendations presented here for any purpose other than the intended purpose; or (ii) its application and/or use by any entity other than the original Client, shall constitute an agreement to defend and indemnify the Consultant from and against any and all liability in connection with the performance of these services and the information contained herein, whether arising out of the Consultant"s negligence or otherwise. No changes to this report, its form, or content can be made without the Consultant"s express written consent. The Consultant"s liability associated with this report is limited to the fee paid by the Client for this Evaluation. Consultant does not accept any third party action or liability. Regardless of theory, action, or compliant, Consultant"s liability will not exceed the fee of the Evaluation paid to Consultant from Client.

The information in this report must be disclosed to all existing and new residents and to any new buyer in the future, under the Lead Disclosure Rule (24 CFR Part 35, Subpart A (HUD's rule) and 40 CFR Part 745, Subpart F (EPA's identical rule)).

1.2 Summary of Property Evaluation

The Consultant found that lead-based paint (illustrated in Table 1 - 1) and lead-based paint hazards (illustrated in Table 1 - 1) were present at the Job Site on the date of the evaluation.The table below identifies lead-based paint and/or lead-based paint hazards as defined by the U.S. Environmental Protection Agency (EPA) within the Job Site.

The Evaluation determined paint-lead hazards as defined by EPA. For specific locations and additional detail on the locations of deteriorated lead-based paint reference Table 1-5: Locations of Deteriorated Lead-based Paint. Based on the grouping procedures in Section 1.2.1, the Property Owner and/or its designated representative will be able to focus on corrective measures for the lead-based paint hazards identified in the Job Site.

Table 1 - 1: Damaged Address Summary			
Account ID:	**101042**	**Damaged Address:**	**4 DELAWARE ST**
Lead-based Paint Present:		**Yes**	
Lead-based Paint in Locations of Deteriorated Paint:		**Yes**	
Dust-lead Hazards Present:		**Yes**	
Soil-lead Hazards Present:		No	

Until all lead-based paint at the Job Site has been removed, Property Owners and/or designated representatives associated with Federally Assisted Properties are required to implement control measures to eliminate as far as practical lead-based paint hazards and implement an ongoing lead-based paint maintenance and reevaluation program.

Absent federal, state or local requirements the Consultant recommends that Property Owners and/or designated representatives implement control measures to eliminate as far as practical lead-based paint hazards and implement an ongoing lead-based paint maintenance and reevaluation program.

1.2.1 Building Groups

Buildings on the property were categorized as belonging to a group referred to as a "stage," where all the buildings in a stage share similar characteristics. A property can have one or more stages of buildings. The building and exterior sites, as required, are grouped into stages according to construction date, construction type, and/or written documentation or visual evidence of similar construction materials. Inspections are performed separately for each stage of the property and reports are issued separately. This property had one (1) stage of buildings.

There is one building.

Table 1 - 2: The Building							
Account ID:	**101042**		**Damaged Address:**		**4 DELAWARE ST**		
Group			**Constructed**				
			Year		**Type**		
Stage 1			pre-1978		Single Family		
Total Number of Buildings:	1		Total Number of Units:	1	Total Number of Units Inspected:		1

1.3 Summary of Lead-based Paint

The information provided in Section 1 is an overview of the detailed job site information provided in Sections 2 and 4. For specific locations and additional detail on the location of lead-based paint reference Sections 2 and 4. Table 1 - 3 identifies lead-based paint as defined by the U.S. Environmental Protection Agency (EPA) and/or State regulations.

Table 1 - 3: Locations of Building Components with Lead-based Paint							
Damaged Address:	4 DELAWARE ST			Account ID:	101042		
Area:	Property Common Area	Building Designation:	4 DELAWARE ST		Designation:	Exterior	
Room Equivalent		Feature		Substrate		Component	
Building Exterior 1		Building Entrance		Wood		Door Surround	
Building Exterior 1		Window		Wood		Shutters	

Perimeter Walls:

Perimeter wall sides are identified with letters A, B, C, and D. Side A in multifamily housing is the apartment building entry door side. Side A in a single family dwelling is the front side of the dwelling. Sides B, C, and D are identified clockwise, starting from the "9 o'clock" position from Side A as one faces the apartment building or single family dwelling; thus Side B is to the left, Side C is across from Side A, and Side D is to the right of Side A.

Interior Walls:

Interior wall sides are identified with letters. Side A is the wall directly in front as one passes through the entry of each Room Equivalent. The remaining walls are identified clockwise from Side A; thus, Side A is directly in front, Side B is to the right, Side C is the wall from which you entered, and Side D is to the left.

Please Note: HUD and EPA have provided specific definitions for the terms deteriorated paint, intact paint, and de minimis (small or minimal) levels when these terms are used to describe surface coating conditions and areas. De minimis (small or minimal) is defined in Table 1 - 4, HUD Definitions. Deteriorated paint is defined as “any interior or exterior paint or other coating that is peeling, chipping, chalking, or cracking or any paint or coating located on an interior or exterior surface or fixture that is otherwise damaged or separated from the substrate.” To aid in the interpretation of the paint condition information, please refer to the following HUD definitions and criteria for specific interior and exterior surfaces. HUD uses the phrase “significant deterioration” to refer to amounts of deterioration greater than the de minimis (small or minimal) levels. Similarly, “significant disturbance” refers to amounts of disturbance, such as in a large rehabilitation project, greater than the de minimis (small or minimal) levels.

Table 1 - 4: HUD Definitions		
Building Component(s)	Intact Paint	De minimus (small or minimal) Levels of Deteriorated Paint
Exterior components with large surface areas (siding, etc.)	Entire surface is intact	Deteriorated paint on less than or equal to 20 square feet of exterior surfaces
Interior components with large surface areas (walls, ceilings, etc.)	Entire surface is intact	Deteriorated paint is observed at less than or equal to 2 square feet of surface in any one interior room or space
Component types with small surface areas (soffits, baseboards, trim, etc.)	Entire surface is intact	Deteriorated paint is observed at less than or equal to 10% of the total surface area of a component type with a small surface area
Note: See 24 CFR 35.1350(d)(1)-(3) for complete information on de minimis (small or minimal) levels.		

Paint conditions and exact location of paint deterioration for specific tested dwelling unit(s), building common area(s) or property common area(s) are reported in this document under Section 4, Appendix D: Paint Condition Survey Results.

Areas and/or components coated with lead-based paint that are currently intact do not constitute a lead hazard. However, be certain to follow the operation and maintenance plan and use lead-safe work practices when dealing with any surfaces that are known or assumed to contain lead-based paint.

Table 1 - 5: Lead-based Paint in Locations of Deteriorated Paint						
Damaged Address:	4 DELAWARE ST			Account ID:	101042	
	4 DELAWARE ST	Area:	Property Common Area	Designation:	Exterior	
Room Equivalent	Feature	Substrate	Component	Risk Assessor Recommendation	Control Method Used by Property Owner Agent	Date Corrected
Building Exterior	Building Entrance	Wood	Door Surround	Paint Stabilization		
Building Exterior	Window	Wood	Shutters	Paint Stabilization		

1.4 Summary of Lead-based Paint Hazards

EPA with 40 CFR Part 745.65 (a), (b) and (c) defines Lead-based Paint Hazards as:

(a) Paint-lead hazard is any of the following:

(1) Any lead-based paint on a friction surface that is subject to abrasion and where the lead dust levels on the nearest horizontal surface underneath the friction surface (e.g., the window sill, or floor) are equal to or greater than the dust-lead hazard levels identified in paragraph (b) of this section.

(2) Any damaged or otherwise deteriorated lead-based paint on an impact surface that is caused by impact from a related building component (such as a door knob that knocks into a wall or a door that knocks against its door frame).

(3) Any chewable lead-based painted surface on which there is evidence of teeth marks.

(4) Any other deteriorated lead-based paint in any residential building or child-occupied facility or on the exterior of any residential building or child-occupied facility.

(b) Dust-lead hazard is surface dust in a residential dwelling or child-occupied facility that contains a mass-per-area concentration of lead equal to or exceeding 40 µg/ft2 on floors or 250 µg/ft2 on interior window sills based on wipe samples.

(c) Soil-lead hazard. A soil-lead hazard is bare soil on residential real property or on the property of a child-occupied facility that contains total lead equal to or exceeding 400 parts per million in a play area or average of 1,200 parts per million of bare soil in the rest of the yard based on soil samples.

EPA further goes on to explain in 40 CFR 745.227 (h)(3)(i), (ii) and (iii) that a dust-lead hazard is present:

(1) In a residential dwelling on floors and interior window sills when the WEIGHTED ARITHMETIC MEAN LEAD LOADING for all single surface or composite samples of floors and interior window sills are equal to or greater than 40 micrograms per square foot (µg/ft2) for floors and 250 µg/ft2 for interior window sills, respectively;

(2) On floors or interior window sills in an unsampled residential dwelling in a multi-family dwelling, if a dust-lead hazard is present on floors or interior window sills, respectively, in at least one sampled residential unit on the property; and,

(3) On floors or interior window sills in an unsampled common area in a multi-family dwelling, if a dust-lead hazard is present on floors or interior window sills, respectively, in at least one sampled common area in the same common area group on the property.

and, as specificed in 40 CFR 745.227(h)(4)(i) and (ii), a soil-lead hazard is present:

(1) In a play area when the soil-lead concentration from a composite play area sample of bare soil is equal to or greater than 400 parts per million; or

(2) In the rest of the yard when the arithmetic mean lead concentration from a composite sample (or arithmetic mean of composite samples) of bare soil from the rest of the yard (i.e., non-play areas) for each residential building on a property is equal to or greater than 1,200 parts per million.

Table 1 - 6: Dust-lead and Soil-lead Hazards											
Damaged Address:	**4 DELAWARE ST**							**Account ID:**	**101042**		
Building Designation:	**4 DELAWARE ST**			**Area:**	**Dwelling Unit**			**Designation:**	**Interior**		
Hazard Type:	**Dust-Lead**										
Feature	**Substrate**	**Component**	**Risk Assessor Recommendation**	**Control Method Used by Property Owner Agent to Resolve the H**	**Date Lead-based Paint Hazard Corrected**						
Dwelling Entrance	Concrete	Floor	Specialized Cleaning								

Table 1 - 7 provides location(s) of lead dust levels that exceed EPA's standards on an "individual basis". Although the Testing Combination's weighted arithmetic mean was below EPA's dust-lead hazard standard, the Consultant recommends that Property Owner and/or its designated representative take Corrective Action to eliminate as far as practicable these individual lead dust locations.

Table 1 - 7: Locations of Individual Lead Dust Locations						
Job Site Name:	4 DELAWARE ST			Job Site Number:	101042	
Building Designation:	4 DELAWARE ST	Area:	Dwelling Unit	Designation:	Interior	
Room Equivalent	Feature	Substrate	Component	Risk Assessor Recommendation	Control Method Used by Property Owner Agent to Resolve the Hazard	Date Lead-dust Corrected
Bedroom 1	Dwelling Unit	Wood	Sill	Specialized Cleaning		
Bedroom 2	Dwelling Unit	Concrete	Floor	Specialized Cleaning		

1.5 Summary of Regulatory Requirements and Recommendations

Deteriorated paint associated with lead-based paint and lead-based paint hazards, as defined by EPA and/or the State, were identified at the Job Site.

The Job Site Owner and/or its designated representative, associated with federally assisted housing, must eliminate all lead-based paint hazards identified in this report within 90 days of receiving this report in units where a child younger than age 6 lives, and common areas servicing those units.

In units in which a child younger than age 6 moves in after receipt of this report, corrective actions shall be completed preferably before the resident moves in but no later than 90 days after the move-in.

In all other dwelling units, common areas, and the remaining portions of the residential Job Site where there are no children younger than age 6, corrective actions shall be completed no later than 12 months after receipt of this report.

The Job Site Owner and/or its designated representative, associated with federally assisted housing, must immediately incorporate ongoing lead-based paint maintenance activities into regular building operations, unless all lead-based paint has been successfully abated (either it was removed, or it was enclosed or encapsulated without failure of those treatments). Examples of control measures are provided in Section 1.7 of the Executive Summary and in Section 3 of the Report. The Job Site Owner and/or its designated representative must have a reevaluation, performed by a certified risk assessor, for lead-based paint hazards or failures of previous hazard control measures at least every 2 years. If the reevaluation identifies new lead-based paint hazards or failures of previous controls, the Job Site Owner and/or its designated representative must control the hazards. A summary of ongoing maintenance and reevaluation activities is in Appendix H.

Corrective measures may involve permanent or temporary elimination of lead-based paint hazards.

Permanent corrective lead hazard control measures include the removal of lead-based paint; enclosure, encapsulation, or replacement of building components coated with lead-based paint; and removal of lead-contaminated soil or overlaying of soil with a durable covering such as asphalt. (Grass and sod are considered interim control measures.) All of these strategies require worksite preparation; protection of residents and residents' belongings; cleanup; waste disposal; clearance testing; recordkeeping; and, in some cases, monitoring. Certified or licensed abatement contractors must be used for permanent lead hazard control work, unless the intent of the work is maintenance, renovation, or rehabilitation.

Temporary corrective measures, using lead-safe work practices, include specialized cleaning, repairs, maintenance, temporary containment, paint stabilization and management and resident education programs. Paint stabilization is the process of repair of any underlying conditions, wet scraping, priming, and repainting surfaces; paint stabilization includes cleanup and closure. This work must be done at a minimum by workers trained in lead-safe work practices.

1.6 Lead Disclosure Requirements

The Residential Lead-based Paint Hazard Reduction Act of 1992 requires Property Owners and/or the designated representatives to disclose the findings of this report to resident(s) within a prescribed period if lead-based paint is present. In addition, depending on the findings of the evaluation, a Property Owner and/or its designated representative may be required to conduct additional disclosure activities. As a result, based on the findings of this evaluation the following disclosure statements apply:

Deteriorated paint associated with lead-based paint and lead-based paint hazards, as defined by EPA and/or the State, were identified at the Job Site.

The Residential Lead-Based Paint Hazard Reduction Act of 1992 directed EPA and HUD to jointly issue regulations requiring disclosure of known lead-based paint and/or lead-based paint hazards by persons selling or leasing housing constructed prior to 1978. These regulations (with identical wording 24 CFR Part 35, and 40 CFR Part 745), known as the Lead Disclosure Rule, were published on March 6, 1996.

At a minimum, an approved summary of this evaluation must be provided to new lessees (residents) and purchasers of this property under federal law (24 CFR Part 35 and 40 CFR Part 745) before they become obligated under a lease or sales contract. The complete report must be provided upon request to both purchaser and resident. Lessors and sellers are also required to distribute an educational pamphlet approved by the EPA and include a standard Lead Warning Statement in their leases or sales contracts to ensure that the public has the information they need to protect their children from lead-based paint hazards.

1.7 Minimum Requirements to Control Lead-based Paint Hazards

In unit(s) with children under age 6 and associated common area(s), the Property Owner and/or its designated representative, associated with federally assisted housing, has 90 days to eliminate all lead-based paint hazards. In all other dwelling unit(s), common area(s), and the remaining portions of the residential property where there are no children younger than age 6, corrective actions shall be completed no later than 12 months after receipt of this report. Hazards can be eliminated either through permanent abatement or interim controls.

1.7.1 Lead-based Paint in Areas of Deteriorated Paint

Lead-based paint in areas of deteriorated paint locations were found in the building and on the building exterior listed in Table 1 - 5: Lead-based Paint in Locations of Deteriorated Paint. Property Owners and/or the designated representatives are required to take the actions listed in Section 1.7.1.1.

1.7.1.1 Interim Control of Deteriorated Paint

1. Conduct paint stabilization.

a. Paint stabilization includes appropriate surface preparation and the application of new paint or coating. If conditions exist that contributed to the lead-based paint deterioration, such as a leaking roof, correct those conditions.

b. Use lead-safe work practices and trained personnel.

c. Do not allow residents in the work area until it has been properly cleared.

d. Obtain a closure examination of the area by a certified lead based paint

2. Conduct ongoing maintenance.

a. Stabilize all lead-based paint that deteriorates.

b. Repair damaged encapsulants/enclosures.

c. Use lead-safe work practices and trained personnel.

d. Notify residents and establish reporting system for deteriorated paint associated with lead-based paint.

1.7.2 Dust Lead Hazards

Dust lead hazards were found in the buildings listed in Table 1 - 6. Property Owners and/or the designated representatives are required to take the actions listed in Section 1.7.2.1.

1.7.2.1 Dust Cleanup Requirements

1. Thorough cleaning by trained personnel. Residents must not be in the area being cleaned.
2. Surfaces contaminated by lead dust should be made smooth and cleanable.
3. Verify completion of dust cleanup with a closure examination by a certified lead-based paint inspector or risk assessor (or Sampling Technician, if allowed in that state).

1.7.2.2 Individual Lead Dust Locations (Not Associated with the EPA Standard)

Lead-dust levels were found in the building(s) listed in Table 1 - 7. Property Owners and/or the designated representatives are recommended to take the corrective actions listed in Section 1.7.2.1.

Section 2: Lead-based Paint Survey and Risk Assessment (Evaluation) Report

2.1 Overview of the Evaluation

2.1.1 Introduction

The field assessment for a lead-based paint survey and a lead-based paint risk assessment (Evaluation) was conducted at the damaged address 4 DELAWARE ST BATON ROUGE, LA, Account ID 101042, on 07/05/2017. Jerry Thomas (employed by AnyCo and accredited under designation BR106726), a State Accredited Lead Risk Assessor in LA, performed the fieldwork. The credentials of this staff member are described in Appendix I: Certifications, Licenses, and Accreditations. The purpose of the evaluation was to determine the presence and location of lead-based paint hazards and lead-based paint.

These evaluation activities will help the Property Owner and/or its designated representative to ensure the health and safety of the residents, especially children, and the workers. As part of the evaluation, a visual assessment of the tested components was performed, a lead-based paint evaluation was performed, and dust wipe and composite soil samples were taken. A lead-based paint evaluation using an X-ray fluorescence (XRF) lead-in-paint analyzer was performed in each selected dwelling unit, basement, and common area. See Section 4, Appendix A: Property Information, for complete building information.

2.1.2 Description of the Damaged Address

The Damaged Address consisted of testing one (1) masonry block single family residential building with one (1) floor, and one (1) dwelling unit built prior to 1978. Detailed information on the Damaged Address, which includes site plan and unit plan(s), is provided in Section 4, Appendix A.

2.2 Lead Regulatory Levels

The lead regulatory levels provided below are those used when preparing this lead-based paint evaluation or when evaluating data collected. The EPA regulatory levels are the same as the state regulatory levels provided in the following table.

Table 2 - 1: Lead Regulatory Levels			
Account ID:	**101042**	**Damaged Address:**	**4354 DELAWARE ST**
	EPA Levels	**Louisiana Levels**	
Lead-based Paint	>/= 1.0 milligrams per square centimeter or >/= 0.5% by weight	>= 1 milligrams per square centimeter or >/= 0.5% by weight (or 5,000 ppm)	
Lead in Dust			
Floor	>/= 40 micrograms per square foot	>/= 40 micrograms per square foot	
Window Sill	>/= 250 micrograms per square foot	>/= 250 micrograms per square foot	
Lead in Bare Soil			
Child-Play Areas (dwelling perimeter and yard)	400 ppm (parts per million)	400 ppm (parts per million)	
Rest of the Yard (dwelling perimeter and yard)	1200 ppm (parts per million)	1200 ppm (parts per million)	

2.3 Lead-based Paint Survey Protocols

2.3.1 Evaluation Equipment

When paint testing for lead was performed, the Evaluation Firm and their LaDEQ Accredited Risk Assessor utilized a Cobalt 57 (Co-57) based Spectrum Analyzer instrument. This X-ray Fluorescent (XRF) instrument underwent Calibration Checks Before, During and After paint testing of the Damaged Address. The process involved:

1. Before Use:
   a. The averaging of three readings on the NIST Standard Reference Material (SRM) – 2573 (near 1.02 milligrams of lead per square centimeter);
   b. Comparing the Average Result to the Instrument's Performance Characteristic Sheet (PCS) – XRF Calibration Check Limits;
   c. The averaging of three readings on the NIST Standard Reference Material (SRM) – 2570 (near 0.00 milligrams of lead per square centimeter); and
   d. Comparing the Average Result to the cited Precision of the XRF Instrument.
2. During Use:
   a. The averaging of three readings on the NIST Standard Reference Material (SRM) – 2573 (near 1.02 milligrams of lead per square centimeter);
   b. Comparing the Average Result to the Instrument's Performance Characteristic Sheet (PCS) – XRF Calibration Check Limits;
3. After Use:
   a. The averaging of three readings on the NIST Standard Reference Material (SRM) – 2573 (near 1.02 milligrams of lead per square centimeter);
   b. Comparing the Average Result to the Instrument's Performance Characteristic Sheet (PCS) – XRF Calibration Check Limits;
   c. The averaging of three readings on the NIST Standard Reference Material (SRM) – 2570 (near 0.00 milligrams of lead per square centimeter); and
   d. Comparing the Average Result to the cited Precision of the XRF Instrument.

To assure accuracy and precision of the instrument, the spectrum analyzer is self-calibrated each time the instrument is turned on (e.g. after turning on the unit or battery change). Internal machine self-calibration occurs automatically.

The spectrum analyzer calibration is validated with a laminated Lead Paint Standards testing card as provided by the manufacturer. The manufacturer supplied standards are traceable to the NIST kit SRM 2579a. The traceability pathway is by direct comparison of the paint standards to a NIST kit SRM 2579a with a spectrum analyzer.

The Inspector will read the standard(s) until the instrument displays a value between acceptable ranges (which approximate the certified values of the samples as provided by the manufacturer) and are recorded on the XRF calibration logs (Appendix C).

2.3.2 Evaluation Protocols, Exceptions, and Variations

Evaluation exceptions and variations can be found in B - 2: Locations Removed from the Evaluation and Special Conditions

2.3.3 Lead-based Paint

For the lead-based paint survey portion of the Evaluation, the Job Site was tested for lead-based paint using selected portions of the inspection protocol of Chapter 7 of the HUD Guidelines for the Evaluation and Control of Lead-based Paint Hazards in Housing (2012 Revision) to determine whether lead-based paint is present in the house, dwelling unit, residential building, or housing development, including common areas and exterior surfaces, and, if present, which building components contain lead-based paint.

If required, ASTM techniques, or its HUD-approved equivalent, were used for paint chilp sample collection. The evaluation team collected and reported to the laboratory the area dimensions of paint chip samples in centimeters (with precision to the nearest 1/16th inch). Paint scrapings are considered destructive in nature since they involve the removal of paint down to its substrate. The disturbed areas were sealed with a coating by the Contractor. The Property Owners and/or the desinaged representatives are solely responsible to restore the area cosmetically.

A testing combination is a unique combination of room equivalent, building component type and substrate. The selection of the test location for a specific testing combination was representative of the paint over the areas which were most likely to be coated with old paint or other lead-based coatings.

The following table, examples of interior and exterior building component types, delineates typical areas and testing combinations that are sampled. Unlisted components that are coated with paint, varnish, shellac, wallpaper, stain, or other coatings were also considered as separate testing combinations.

Commonly Encountered Interior Painted Surfaces That Should Be Tested Include:	
Balustrades	Floors
Baseboards	Handrails
Bathroom Vanities	Newel Posts
Beams	Other Heating Units
Cabinets	Radiators
Ceilings	Shelf Supports
Chair Rails	Shelves
Columns	Stair Stringers
Counter Tops	Stair Treads and Risers
Crown Molding	Stools and Aprons
Doors and Trims	Walls
Fireplaces / Mantles	Window Sashes and Trim
Exterior Painted Components (if accessible) That Should Be Tested Include:	
Balustrades	Lattice Work
Bulkheads	Painted Roofing
Chimneys	Railing Caps
Columns	Rake Boards
Corner Boards	Sashes
Fascias	Soffits
Floors	Stairs and Risers
Gutters and Downspouts	Stair Stringers
Joists	Window Trim
Handrails	
Other Exterior Painted Components Include:	
Fences	Storage Sheds & Garages
Laundry Line Posts	Swing Sets and Other Play Equipment

2.4 Risk Assessment Overview

The risk assessment is an on-site investigation to determine the existence, nature, severity, and location of lead-based paint hazards, and the provision of a report by the individual or the firm conducting the risk assessment, explaining the results of the investigation and options for reducing lead-based paint hazards. A risk assessment conforming to HUD guidelines was performed within the same tested unit(s) and common area(s) where the lead-based paint survey was conducted. The risk assessment was conducted by the risk assessor who conducted the lead-based paint survey; the inspector is listed in Section 2.1.1, Lead-Based Paint Inspection; inspector credentials are described in Appendix I: Certifications, Licenses, and Accreditations.

There are several types of lead-based paint hazards. Section 1.4 presents the risk assessment findings for types of lead-based paint hazards that could be found during a risk assessment.

Hazard control options and associated cost estimates to treat any areas or components identified with lead-based paint hazards are discussed later in this report. To aid in the interpretation of the listed findings, a glossary of terms and a list of publications and resources addressing lead-based paint hazards and their health effects are included at the end of this report, in Appendix I.

2.4.1 Dust-lead

The requirements of American Society for Testing and Materials Designation E 1728, Standard Practice for Field Collection of Settled Dust Samples Using Wipe Sampling Methods for Lead Determination by Atomic Spectrometry Techniques, or its HUD-approved equivalent, was used for settled dust collection. On floors, tests of settled dust included collection of dust samples from an area having a minimum collection area of one square foot. On window sills and other rectangular surfaces, tests of settled dust included collection of dust samples from an area having a minimum collection area of 0.1 square foot. Area dimensions were collected and recorded in inches to the nearest 1/16th of an inch. The collected dust samples with the collection dimensions (in inches) were submitted to the selected laboratory, and analysis results from the laboratory required for Risk Assessment Reporting are reported in Appendix E.

When fielid conditions permitted, a minimum of eight (8) dust wipes were collected near friction or impact spots or in areas nearest to deteriorated paint:

For Dwelling Units:

1. Entryway floor
2. In selective room equivalents
3. Areas where defective paint are identified

For Common Areas:

Common stairwells and hallways of multifamily housing will be as follows:

Low-rise buildings (four stories or less):

1. Entry area floor
2. First floor landing of the common hallway or stairway
3. Window sill, as applicable

On-site Community Centers, Day Care, Recreational, or other Common Areas Frequented by Children:

For spaces up to 2,000 square feet:

1. Floors: Two samples from widely separated locations in “high-traffic” areas regularly used or frequented by children
2. Windows: One sample from an interior window sill

For spaces over to 2,000 square feet:

1. Floors: One additional sample for each increment of 2,000 square feet
2. Windows: One sample from an interior window sill for each increment of 2,000 square feet

Areas which were inaccessible for dust-lead evaluation, as applicable are included in Appendix B.

2.4.2 Bare Soil

The requirements of American Society for Testing and Materials Designation E 1727, Standard Practice for the Field Collection of Soil Samples for Lead Determination by Atomic Spectrometry Techniques, or its HUD-approved equivalent, were used for soil collection. Collected soil samples were submitted to our selected laboratory for lead determination, and analysis results from the laboratory required for Risk Assessment Reporting is reported in Appendix F.

Areas sampled for lead in soil include:

- Each exterior children's play area where bare soil is present; and,
- Drip-line/foundation where bare soil is present.

In order to reduce variability, soil samples collected are "composite" samples, meaning that soil collected from more than one spot is mixed with soil from another spot of the same sample type (i.e. children's play area, dripline/foundation and/or midyard). Each composite sample usually consists of 5 - 10 sub-samples mixed together. The play area and midyard bare soil sample areas are divided by an X-shaped grid, and the sub-samples are collected at equidistant points along each axis as site conditions permit. Note, however, that sampling bare areas is more important than maintaining a straight line along the grid. If there is no bare soil observed, such as areas covered by pavement or concrete, dense grass, ivy, mulch, or other ground covering material, no soil sampling is conducted.

Soil sample locations are described in this report as either a play area, a dripline/foundation, or a midyard sample. Each play area observed is sampled uniquely. A play area is considered to be any area that is expected to be used frequently by children, such as residential backyards, sandboxes, playgrounds, ball fields and other areas where children may gather. For the purposes of this report, play areas also include vegetable gardens. Where applicable, one dripline/foundation composite sample (i.e. areas of bare soil approximately 2 - 3 feet from the building foundation walls) and one midyard composite sample (i.e. other areas of bare soil or patches observed at the property where contact by children is less likely or infrequent) are collected.

2.4.3 Equipment Quality Control

Compliance was automatic with real-time business logic built into the pen-based data collection device (PDE) utilized for recording the Evaluation data. Out-of-range resolution and/or calibration readings at the PDE interface were rejected as invalid data.

For additional quality control safegaurds, ten representative testing combinations were selected for re-testing by XRF. The ten repeat XRF results are compared with the ten XRF results previously made on the same testing combinations. The repeat readings and the original readings were averaged and compared to the Retest Tolerance Limit as calculated in accordance with the XRF "Performance Characteristic Sheet". If the Retest Tolerance Limit was exceeded, the evaluation was considered deficient and the Property re-sampled. The Retest Tolerance Limit was not exceeded during this evaluation. Quality Control data results are included in Appendix H.

2.4.4 Environmental Sampling Quality Control

The designated laboratory provided dust wipe spike samples. Wipe spikes were blindly submitted at a rate of at least 1 per 20 samples. Blind wipe blanks were collected after sampling the final unit of the day, but before decontamination, at a rate of at least one blank wipe for each dwelling unit sampled or one blank for every 20 field samples, whichever was less. Spikes and blanks are used to verify the laboratory analysis data, and to confirm the consistency of the data.

The designated laboratory also provided soil spike samples. Soil spike samples were submitted blindly at a rate of at least 1 per 20 samples. The spikes are used to verify the laboratory analysis data and to confirm the consistency of the data.

Environmental sampling quality control data results are included in the appendices.

2.4.5 Inaccessible Areas / Protocol Variations

The evaluation was only of readily accessible areas. Generally, the following areas were considered inaccessible:

- Original walls or ceiling surfaces enclosed with wallboard or similar material.
- Locked areas.
- Space which would require destructive measures (i.e., cutting, hammering, removing, etc.) to gain access.
- Space greater than 8' from the floor or grade.

Additional, specific areas to which access was not possible are included in Appendix B. Protocol variations and special conditions encountered during the Evaluation are included in Appendix B.

2.5 Lead-Safe Work Practice Requirements for Maintenance, Renovation or Remodeling

Lead-based paint and lead-based paint hazards have been identified that require lead-safe work practices and lead-based hazard controls to be implemented for any hazard control activity, repair, remodeling, or renovation effort and any other work efforts that may disturb known or assumed lead-based paint in amounts that are above HUD's de minimis (small or minimal) levels. Details concerning lead-safe work practices and acceptable lead-based paint hazard control methods can be found in the HUD "Guidelines for the Evaluation and Control of Lead-Based Paint Hazards in Housing." This document is available from the Web at www.hud.gov/offices/lead.

Workers disturbing lead-based paint during maintenance, repair, or rehabilitation activities above HUD's de minimis (small or minimal) levels and any other work efforts that may disturb known or assumed lead-based paint in amounts that are above HUD's de minimis (small or minimal) levels must be trained in lead-safe work practices in the event the Job Site is Federally funded. Otherwise it is recommended to be done. Information regarding painting, home maintenance, and renovation work can be referenced in Lead Paint Safety: Field Guide for Painting, Home Maintenance, and Renovation Work (Source: HUD/EPA/CDC). The field guide is available from the HUD web site above, in English and Spanish. Information regarding lead-safe work practices training courses are available at The Lead Listing (www.leadlisting.org) and the HUD Office of Healthy Homes and Lead Hazard Control web site (www.hud.gov/offices/lead) links to "Lead Training" and "Lead Training Curricula."

A closure examination (visual inspection, dust sampling, and possible XRF testing) should follow any hazard control activity, repair, remodeling, or renovation effort to ensure dust lead levels are below the EPA regulatory levels.

2.6 Lead-based Paint Hazard Control Plan

Except in the case of the complete removal of all lead-based paint, ongoing management and maintenance of lead-based paint hazards should be required. The Property Owner and/or designated representative should assign responsibility for managing the various aspects of a lead-based paint hazard control program to either a trained consultant, or he/she should train one of the trusted existing staff members. This program should be described in a lead-based paint hazard control policy statement. The statement should document the Property Owner and/or designated representative's awareness of the lead-based paint hazard problem and his or her intention to control it. The statement should also authorize a specific individual to carry out the lead-based paint hazard control plan.

2.7 Option For Additional Testing

Some Property Owners and/or the designated representatives may find that additional testing could reduce their requirements for lead hazard control. The requirements described in this report are based on lead evaluations for randomly selected units. Untested units are assumed similar to these randomly selected units. The Property Owner and/or its designated representative is encouraged to consider the benefits of additional testing using their own private consultant, who must be a State- or EPA-licensed lead-based paint risk assessor or lead-based paint inspector, if they believe one of the following applies: 1) that untested units are free of lead-based paints or free of lead hazards; 2) if the results of this report show there are only a few surfaces with lead-based paint or 3) if the results of this report show there are only few lead-based paint hazards.

Additional evaluation may provide information that will assist the Property Owner and/or its designated representative to focus on maintenance or corrective measures regarding specific building components with lead-based paint. Additional assessment by a certified lead-based paint risk assessor will further define the nature, severity, source and location of lead-based paint hazards. This will provide the Property Owner and/or its designated representative with multiple options to focus on corrective measures regarding interim controls, permanent controls, and management/maintenance systems. As stated previously, the Property Owner and/or its designated representative may realize cost savings by pursuing further assistance.

Although Property Owners and/or the designated representatives will have to pay for the additional evaluations, the cost of additional testing may be less than the costs associated with assuming that untested units or building components have lead-based paint and lead-based paint hazards. It also may be possible to remove lead-based paint or components with lead-based paint to make the building free of all lead-based paint. In these cases, the HUD Lead Safe Housing Rule does not apply, and the HUD/EPA lead disclosure rule does not apply to leases.

The HUD Lead Safe Housing Rule applies to the property until written certification stating that the property is lead-based paint free is obtained from a state licensed lead-based paint inspector. The lead-based paint free certification must meet all regulatory guidelines established by HUD, EPA and the state. A certified lead-based paint inspector can review the information provided in this report to determine any additional information or action that is required to certify the property as lead-based paint free.

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Section 3: Methods of Controlling Lead-based Paint Hazards

This Section typically provides U.S. Housing and Urban Development (HUD) options and typical cost associated with several Abatement and Interim Control Options. These general options are sourced from HUD Guidelines available at www.hud.gov/lead. ACE under its State of Louisiana Office of Community Development Contract will develop Damaged Address Specific Treatments that reflect the Damage Assessment portion of this holistic process. If you have any questions please contact your Case Manager.

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SECTION 4: APPENDICES

Appendix A: Property Information
- A - 1: Owner Questionnaire
- A - 2: Site Specific Property Information
- A - 3: Property Lead-based Paint Management Information
- A - 4: Property Condition Survey
- A - 5: Site Plan and Floor Plan Data

Appendix B: Unit Selection
- B - 1: Unit Requested for Testing
- B - 2: Special Conditions

Appendix C: XRF Sampling
- C - 1: XRF Data by Area
- C - 2: XRF Risk Assessor/Evaluators Manufacturers Training Certificate
- C - 3: XRF Performance Characteristic Sheet
- C - 4: XRF State Radioactive Materials License (Available Upon Written Request)
- C - 5: XRF Calibration Checks/Field Validation Results

Appendix D: Paint Condition Data
- D - 1: Lead-based Paint in Locations of Deteriorated Paint (Requiring Lead-safe Work Practices and Clearance Testing)

Appendix E: Dust Wipe Sample Analytical Data
- E - 1: Dust Wipe Sampling Data Summary Sheet
- E - 2: Summary of the Total Number of Separate Testing Combinations Sampled for Dust -lead

Appendix F: Soil Sample Analytical Data
- F - 1: Soil Sampling Data Summary Sheet

Appendix G: Paint Chip Sample Analytical Data
- G - 1: Paint Chip Sampling Data Summary Sheet

Appendix H: Quality Control Data Results

Appendix I: Certifications, Licenses, and Accreditations
- I - 1: Lead-based Paint Inspector and Risk Assessor's License/Certification Information
- I - 2: Copy of Firm's Lead Activity License/Certification
- I - 3: Laboratory NLLAP Accreditation Information

Appendix J: Maintenance and Reevaluation

Appendix K: Laboratory Documentation

Appendix L: Lead and Lead Safety Resource Data
- L - 1: Glossary
- L - 2: Resources for Additional Information on Lead and Lead-based Paint

Appendix M: Photographic Documentation

Appendix N: Notice of Evaluation or Hazard Activities
- EPA - Protect Your Family from Lead in Your Home
- EPA - Renovate Right

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Appendix A: Property Information

A - 1: Owner Questionnaire

A - 2: Site Specific Property Information

A - 3: Property Lead-based Paint Management Information

A - 4: Property Condition Survey

A - 5: Site Plan and Floor Plan Data

A - 1: Owner Questionnaire

A client questionnaire was completed as part of the evaluation to help to identify particular property use patterns and to evaluate the Owner's management capabilities with regard to lead -based paint hazard controls. The persons who conducted the evaluation made building condition determinations. Following is a summary of the information obtained during that interview:

Account ID:	101042
Owner:	LINDA SMITH
Name and Address of Development:	4 DELAWARE ST BATON ROUGE, LA 70805
Number of Years under Current Management:	N/A
Common Areas:	Building Exterior
Date of Development Construction:	Stage 1: pre-1978
Percent Occupancy:	N/A
Dates of Substantial Rehabilitation Activities:	N/A
Single Family 4 DELAWARE ST	N/A
Number and Location of Common Child Play Areas:	N/A
Pet Policy at Development:	N/A
Structures' cooling and heating method(s):	N/A: Job Site was vacant
Locations of Common Dwelling Unit Gardens:	N/A
Existing Landscaping:	N/A: Job Site was vacant
Plans for Landscaping:	N/A
Common Areas Cleaning Regimen:	NO CLEANING REGIMEN NOTED AT THIS TIME.
HEPA Vacuum Used in Common Areas?	NO
Recently Completed Renovations:	NO
Previous Lead-based Paint Hazard Control Activities:	NO
Previous Lead-based Paint Evaluations:	NO
Onsite Daycare Facilities:	NONE
Current Resident Children Diagnosed with Elevated Blood Lead Levels:	N/A: Job Site was vacant
Past Resident Children Diagnosed with Elevated Blood Lead Levels:	N/A: Job Site was vacant
Demolition Debris Onsite:	NONE
Other Pertinent Information:	NONE

A - 2: Damaged Address Information

Property Information					
Account ID	Damaged Address	Building Total	City	State	Zip
101042	4 DELAWARE ST, 70805	1	BATON ROUGE	LA	70805

Contact Information							
	Name	Address	City	State	Zip	Phone Number	Email
OWNER	SMITH, LINDA	4 DELAWARE ST	BATON ROUGE	LA	70805	5555555555	N/A
OWNER CONTACT	N/A	N/A	N/A	N/A	N/A	N/A	N/A
MGMT. AGENT CONTACT	N/A	N/A	N/A	N/A	N/A	N/A	N/A

Building Information								
#	Building Name	Building Address	Building Type	Constructed	Construction Material Type	No. of Units	No. of Common Areas	Common Area Type
1	4 DELAWARE ST	4 DELAWARE ST	Single Family	pre-1978	Masonry Block	1	1	Building Exterior

A - 3: Property Condition Survey

Date of Construction:	pre-1978
Apparent Building Use:	Residential
Setting:	Residential
Designs:	Single Family
Construction Type:	Single Family - Masonry Block Construction, Combination Brick & Vinyl Siding Exterior, Shingled Roof, Drywall Interior, Concrete Foundation
Lot Type:	Flat
Roofs:	No significant damage noted at the time of the evaluation.
Foundations:	No significant damage noted at the time of the evaluation.
Lawn Condition:	No significant damage noted at the time of the evaluation.
Drip Line Condition:	No significant damage noted at the time of the evaluation.
Water Stains on Walls/Ceilings:	No significant damage noted at the time of the evaluation.
Exterior Painting Frequency:	As required by applicant.
Interior Painting Frequency:	As required by applicant.
Painting Contractor Used -- Exterior:	As required by applicant.
Painting Contractor Used -- Interior:	As required by applicant.
Paint Prep Methods Previously Used:	Varies.
Cleanup Methods Previously Used:	Varies.
Was area containment previously used?	Unknown.
Was furniture removed or covered?	Unknown.
Was a preventive maintenance program in place?	Unknown.
Was a work order system used for repairs?	N/A
At this time, are lead-based paint or potential lead-based paint locations noted on the work order?	N/A - No work order issued.
Site Evaluation:	4 DELAWARE ST: Good
Exterior Structural Condition:	No noted issues at the time of the evaluation.
Interior Structural Condition:	No noted issues at the time of the evaluation.
Overall Building/Site Condition:	4 DELAWARE ST: Good

Wall Direction: "A" indicates location of the "A" Wall (or primary direction wall) all other designation move in a clockwise direction for "B", "C" and "D" walls.

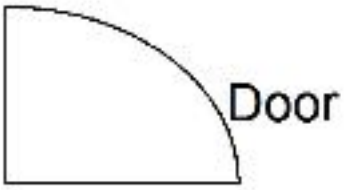
Dust-Lead Samples: "X" indicates the location where Floor, Entry or Window Sill samples where obtained.

Soil-Lead Samples: "D" designates Drip Line Sample. "P" designates Play Area sample. "S" designates a Mid-Yard Sample. Numbers succeeding the letter indicate the aliquot of the actual sample.

DE: Dwelling Entrance

REE: Room Equivalent Entrance

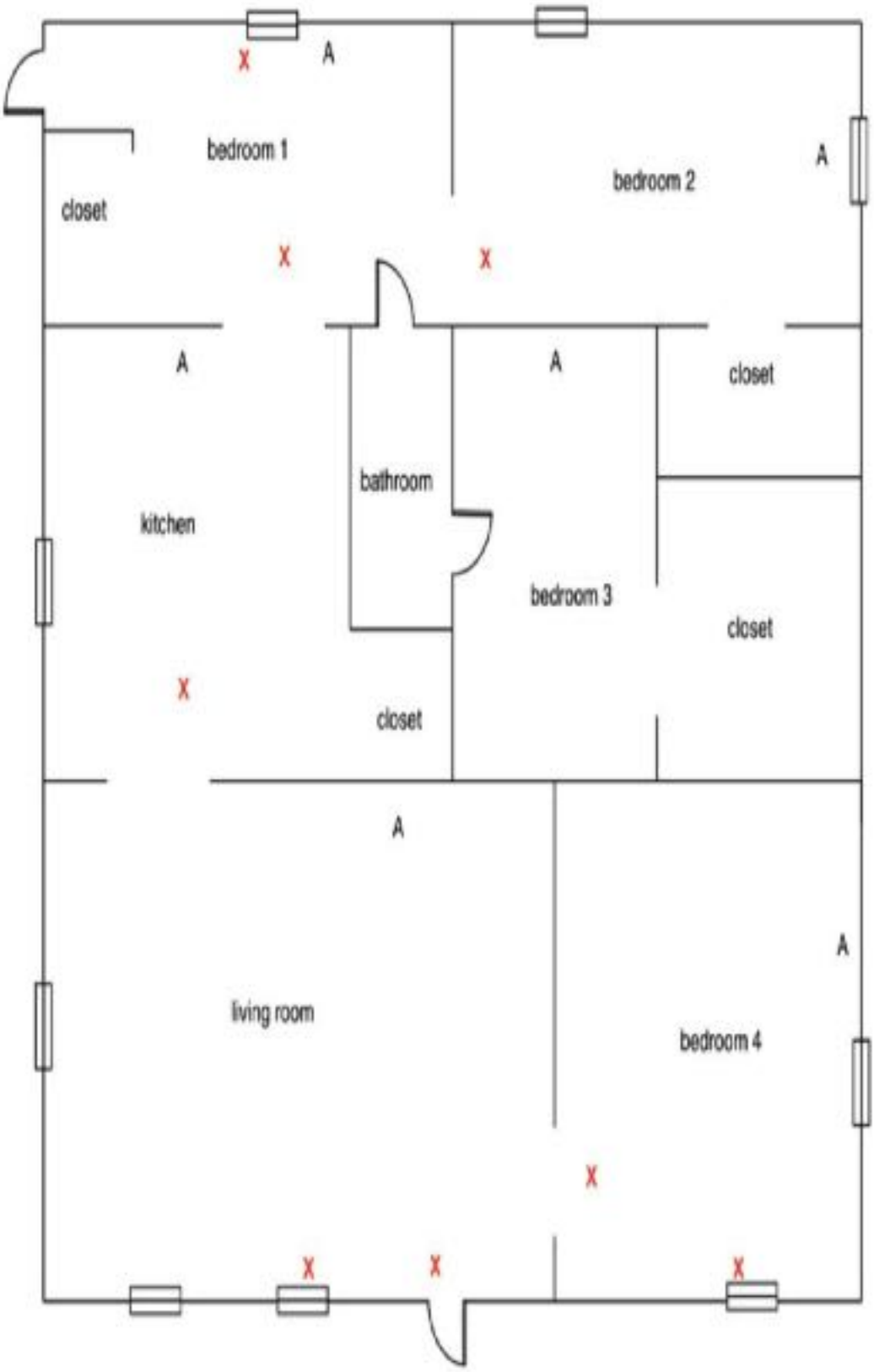
BE: Building Entrance



DWELLING UNIT PLAN

X = Dust-lead Sample Location

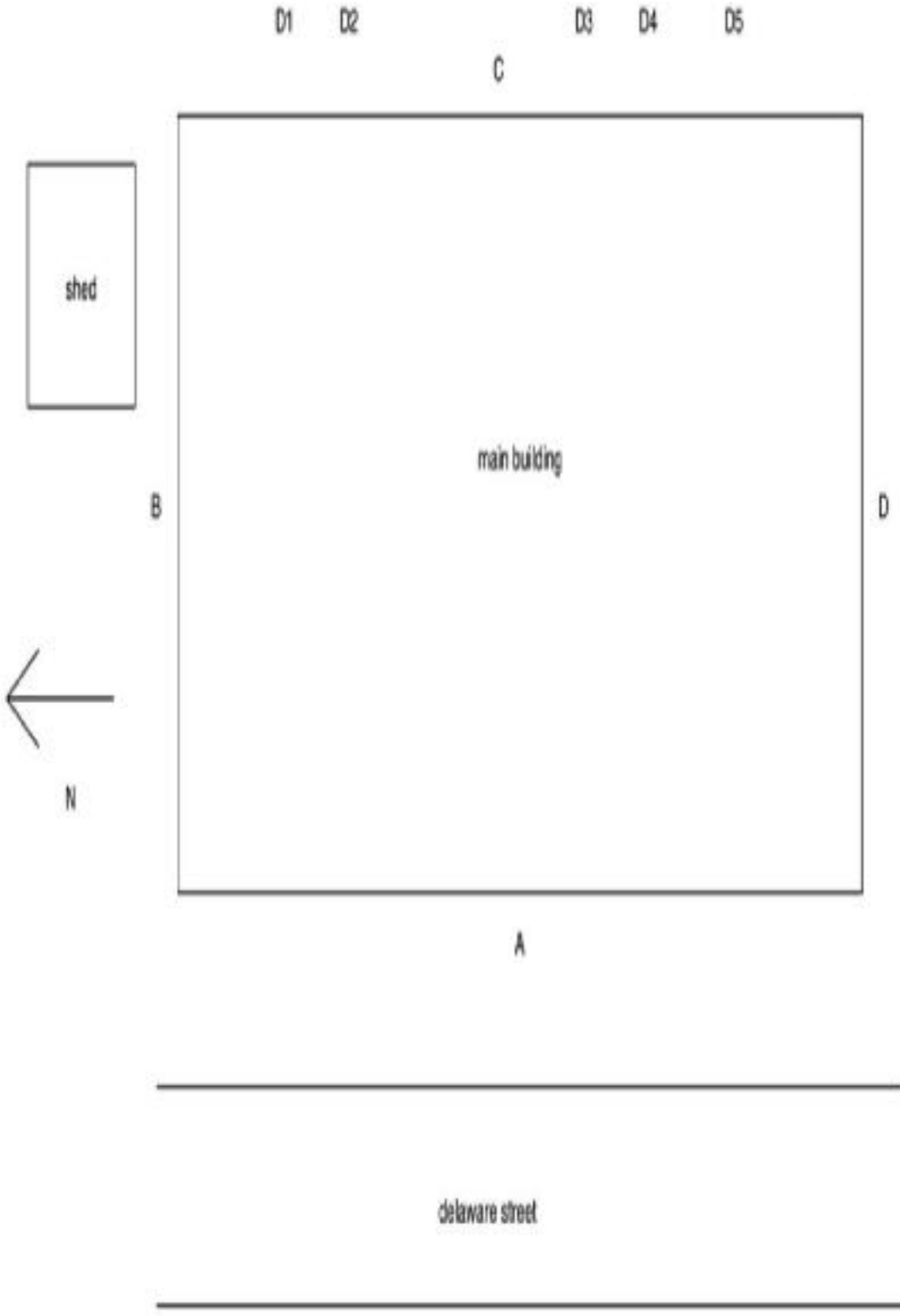
4 DELAWARE ST - Interior



COMMON AREA PLAN

X = Soil-lead Sample Location

4 DELAWARE ST - Exterior



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Appendix B: Unit Selection

B - 1: Unit Requested for Testing

B - 2: Special Conditions

B - 1: Unit Requested for Testing

Stage 1: Constructed pre-1978				
Address	Units		Common Areas	
	Total	Tested	Total	Tested
4 DELAWARE ST - 4 DELAWARE ST	1	1	1	1

B - 2: Special Conditions

Job Site

JERRY THOMAS, 1234 CLARK BLVD., BATON ROUGE, LA 70809, (555) 555-5555

CERAMIC TILE – DUST-LEAD CAN BE DETECTED ON CERAMIC TILE FLOORING SYSTEM WITH OR WITHOUT THE PRESENCE OF LEAD-BASED PAINT. SOME CERAMIC TILE AND ITS ASSOCIATED GROUT MAY HAVE LEAD WITHIN ITS MATRIX. TILE GLAZING HISTORICALLY CONTAINED LEAD WITHIN ITS MIXTURE. FLOORING SYSTEMS LIKE THESE MUST BE PROPERLY SEALED WITH A COMPATIBLE MATERIAL WHICH IS ALSO SLIP RESISTANT AND DOES NOT ADVERSELY IMPACT SAFETY.

DUST-LEAD FIELD BLANKS (A WIPE IS EXPOSED TO THE SAME HANDLING AS FIELD SAMPLE EXCEPT THAT NO SAMPLE IS COLLECTED) WERE PROCESSED AT A MINIMUM FREQUENCY OF 5% [1 FIELD BLANK FOR EACH COLLECTED FIELD WIPE] OR 1 FIELD BLANK PER DAMAGED ADDRESS; WHICHEVER IS GREATER.

DUST-LEAD SAMPLES COLLECTION FOLLOWED APPLICABLE SECTIONS OF ASTM DESIGNATION E 1728 – 16 STANDARD PRACTICE FOR COLLECTION OF SETTLED DUST SAMPLING USING WIPE SAMPLING METHODS FOR SUBSEQUENT LEAD DETERMINATION.

DUST-LEAD SAMPLES FROM FLOORS UTILIZED A REUSABLE PLASTIC TEMPLATE [APPROXIMATELY ONE (1) SQUARE FOOT] TO DELINEATE THE SAMPLING LOCATION. DUST-LEAD SAMPLES FROM WINDOW SILLS AND/OR WELLS/TROUGHS UTILIZED THE TAPE METHOD TO DELINEATE THE SAMPLING LOCATION.

DUST-LEAD SAMPLES UTILIZED ASTM RECOGNIZED SAMPLE MEDIA (I.E. WIPE). BRAND – LEAD WIPE; MANUFACTURER – ARAMSCO; AND LOT NUMBER 12/2016. AT THE BEGINNING AND THROUGHOUT PROGRAM USAGE THE LOT WAS EVALUATED FOR CONTAMINATION. NO ISSUES WERE DETECTED.

DUST-LEAD, SOIL-LEAD AND PAINT-LEAD FIELD DATA RELATED TO SAMPLE COLLECTION WAS DOCUMENTED REAL TIME WITH THE PROGRAM DATA MANAGEMENT SYSTEM.

DUST-LEAD, SOIL-LEAD AND PAINT-LEAD FIELD SAMPLE TUBES WERE ASSIGNED A UNIQUE PREPRINTED SAMPLE NUMBER. THE VINYL LABEL WAS AFFIXED TO THE TUBE AND IT UNIQUE NUMBER WAS ENTERED IN THE FIELD ELECTRONIC NOTEBOOK AS PART OF THE PROGRAM DATA MANAGEMENT SYSTEM.

IN MOST SITUATIONS AREAS OF LEAD-BASED PAINT AND DETERIORATED PAINT SHALL BE TREATED UTILIZING PAINT STABILIZATION. THIS TREATMENT INVOLVES BOTH RESTORATION OF THE SUBSTRATE AND THE PAINTED SURFACES. ALL TREATMENTS SHALL BE PERFORMED BY BOTH LADEQ AND EPA ACCREDITED FIRM/EMPLOYEES AND CERTIFIED FIRMS/RENOVATORS, RESPECTIVELY. THE ACE CASE MANAGER WILL PROVIDE FIRM AND EMPLOYEE DESIGNATION UPON REQUEST. IF THE APPLICANT WORKS DIRECTLY WITH THE FIRM/EMPLOYEES DISTURBING PAINT, STAIN, SHELLAC AND VARNISH THEY TOO SHALL INDEPENDENTLY OBTAIN THE DOCUMENTATION.

B - 2: Special Conditions

Job Site

LEAD-BASED PAINT AND LEAD-BASED PAINT HAZARD DETERMINATION FOLLOWED 40 CFR PART 745.22 (H) – DETERMINATION:

(1) LEAD-BASED PAINT IS PRESENT: (I) ON ANY SURFACE THAT IS TESTED AND FOUND TO CONTAIN LEAD EQUAL TO OR IN EXCESS OF 1.0 MILLIGRAMS PER SQUARE CENTIMETER OR EQUAL TO OR IN EXCESS OF 0.5% BY WEIGHT; AND (II) ON ANY SURFACE LIKE A SURFACE TESTED IN THE SAME ROOM EQUIVALENT THAT HAS A SIMILAR PAINTING HISTORY AND THAT IS FOUND TO BE LEAD-BASED PAINT.

(2) PAINT-LEAD HAZARD IS PRESENT: (I) ON ANY FRICTION SURFACE THAT IS SUBJECT TO ABRASION AND WHERE THE LEAD DUST LEVELS ON THE NEAREST HORIZONTAL SURFACE UNDERNEATH THE FRICTION SURFACE (E.G., THE WINDOW SILL OR FLOOR) ARE EQUAL TO OR GREATER THAN THE DUST HAZARD LEVELS IDENTIFIED IN §745.227(B); (II) ON ANY CHEWABLE LEAD-BASED PAINT SURFACE ON WHICH THERE IS EVIDENCE OF TEETH MARKS; (III) WHERE THERE IS ANY DAMAGED OR OTHERWISE DETERIORATED LEAD-BASED PAINT ON AN IMPACT SURFACE THAT IS CAUSE BY IMPACT FROM A RELATED BUILDING COMPONENT (SUCH AS A DOOR KNOB THAT KNOCKS INTO A WALL OR A DOOR THAT KNOCKS AGAINST ITS DOOR FRAME; AND (IV) IF THERE IS ANY OTHER DETERIORATED LEAD-BASED PAINT IN ANY RESIDENTIAL BUILDING OR CHILD-OCCUPIED FACILITY OR ON THE EXTERIOR OF ANY RESIDENTIAL BUILDING OR CHILD-OCCUPIED FACILITY.

(3) A DUST-LEAD HAZARD IS PRESENT IN A RESIDENTIAL DWELLING OR CHILD OCCUPIED FACILITY: (I) IN A RESIDENTIAL DWELLING ON FLOORS AND INTERIOR WINDOW SILLS WHEN THE WEIGHTED ARITHMETIC MEAN LEAD LOADING FOR ALL SINGLE SURFACE OR COMPOSITE SAMPLES OF FLOORS AND INTERIOR WINDOW SILLS ARE EQUAL TO OR GREATER THAN 40 µG/FT2 FOR FLOORS AND 250 µG/FT2 FOR INTERIOR WINDOW SILLS, RESPECTIVELY; (II) ON FLOORS OR INTERIOR WINDOW SILLS IN AN UNSAMPLED RESIDENTIAL DWELLING IN A MULTI-FAMILY DWELLING, IF A DUST-LEAD HAZARD IS PRESENT ON FLOORS OR INTERIOR WINDOW SILLS, RESPECTIVELY, IN AT LEAST ONE SAMPLED RESIDENTIAL UNIT ON THE PROPERTY; AND (III) ON FLOORS OR INTERIOR WINDOW SILLS IN AN UNSAMPLED COMMON AREA IN A MULTI-FAMILY DWELLING, IF A DUST-LEAD HAZARD IS PRESENT ON FLOORS OR INTERIOR WINDOW SILLS, RESPECTIVELY, IN AT LEAST ONE SAMPLED COMMON AREA IN THE SAME COMMON AREA GROUP ON THE PROPERTY.

(4) A SOIL-LEAD HAZARD IS PRESENT: (I) IN A PLAY AREA WHEN THE SOIL-LEAD CONCENTRATION FROM A COMPOSITE PLAY AREA SAMPLE OF BARE SOIL IS EQUAL TO OR GREATER THAN 400 PARTS PER MILLION; OR (II) IN THE REST OF THE YARD WHEN THE ARITHMETIC MEAN LEAD CONCENTRATION FROM A COMPOSITE SAMPLE (OR ARITHMETIC MEAN OF COMPOSITE SAMPLES) OF BARE SOIL FROM THE REST OF THE YARD (I.E., NON-PLAY AREAS) FOR EACH RESIDENTIAL BUILDING ON A PROPERTY IS EQUAL TO OR GREATER THAN 1,200 PARTS PER MILLION.

B - 2: Special Conditions

Job Site

PAINT TESTING INCLUDED THE USE OF THE PERFORMANCE CHARACTERISTIC SHEET (PCS), INCLUDING BUT NOT LIMITED TO EVALUATING THE QUALITY OF XRF TESTING. THE CALCULATION WAS AS FOLLOWS AND THE RESULT ARE PRESENTED IN THE QUALITY CONTROL SECTION OF THIS REPORT:

RANDOMLY SELECT TEN TESTING COMBINATIONS FOR RETESTING FROM EACH HOUSE OR FROM TWO RANDOMLY SELECTED UNITS IN MULTIFAMILY HOUSING.
CONDUCT XRF RE-TESTING AT THE TEN TESTING COMBINATIONS SELECTED FOR RETESTING.

DETERMINE IF THE XRF TESTING IN THE UNITS OR HOUSE PASSED OR FAILED THE TEST BY APPLYING THE STEPS BELOW.

COMPUTE THE RETEST TOLERANCE LIMIT BY THE FOLLOWING STEPS:

DETERMINE XRF RESULTS FOR THE ORIGINAL AND RETEST XRF READINGS. DO NOT CORRECT THE ORIGINAL OR RETEST RESULTS FOR SUBSTRATE BIAS. IN SINGLE-FAMILY AND MULTI-FAMILY HOUSING, A RESULT IS DEFINED AS A SINGLE READING. THEREFORE, THERE WILL BE TEN ORIGINAL AND TEN RETEST XRF RESULTS FOR EACH HOUSE OR FOR THE TWO SELECTED UNITS.

CALCULATE THE AVERAGE OF THE ORIGINAL XRF RESULT AND THE RETEST XRF RESULT FOR EACH TESTING COMBINATION.

SQUARE THE AVERAGE FOR EACH TESTING COMBINATION.

ADD THE TEN SQUARED AVERAGES TOGETHER. CALL THIS QUANTITY C.

I. MULTIPLY THE NUMBER C BY 0.0072. CALL THIS QUANTITY D.
II. ADD THE NUMBER 0.032 TO D. CALL THIS QUANTITY E.
III. TAKE THE SQUARE ROOT OF E. CALL THIS QUANTITY F.
IV. MULTIPLY F BY 1.645. THE RESULT IS THE RETEST TOLERANCE LIMIT.

COMPUTE THE AVERAGE OF ALL TEN ORIGINAL XRF READINGS.

COMPUTE THE AVERAGE OF ALL TEN RE-TEST XRF READINGS.

FIND THE ABSOLUTE DIFFERENCE OF THE TWO AVERAGES.

IF THE DIFFERENCE IS LESS THAN THE RETEST TOLERANCE LIMIT, THE INSPECTION HAS PASSED THE RETEST. IF THE DIFFERENCE OF THE OVERALL AVERAGES EQUALS OR EXCEEDS THE RETEST TOLERANCE LIMIT, THIS PROCEDURE SHOULD BE REPEATED WITH TEN NEW TESTING COMBINATIONS. IF THE DIFFERENCE OF THE OVERALL AVERAGES IS EQUAL TO OR GREATER THAN THE RETEST TOLERANCE LIMIT A SECOND TIME, THEN THE INSPECTION SHOULD BE CONSIDERED DEFICIENT.

B - 2: Special Conditions

Job Site

PAINT TESTING PRIMARILY UTILIZED THE X-RAY FLUORESCENT (XRF) METHOD OF DETECTION. ALL UTILIZED XRFS HAVE A CURRENT JOINT HUD/EPA/MANUFACTURER PERFORMANCE CHARACTERISTIC (PCS) SHEET. IF CONFLICT EXISTED, THE MORE STRINGENT OF THE STATED REQUIREMENTS WERE UTILIZED.

PAINT TESTING WAS LIMITED TO PAINT, STAIN, SHELLAC AND VARNISH READILY ACCESSIBLE TO A CHILD. THE DETERMINATION OF “ACCESSIBLE TO A CHILD” WAS DETERMINE BY CONTRACTUAL TERMS OR FIELD CONDITIONS AS EVALUATED BY THE INSPECTOR. EXAMPLES OF AREAS NOT CONSIDERED “ACCESSIBLE TO A CHILD” INCLUDED BUT ARE NOT LIMITED TO: LOCKED OR SECURED AREAS; HEIGHTS GREATER THAN EIGHT (8) FEET, AREAS ENCLOSED (DRYWALL, BREAK METAL, COIL STOCK, ETC.).

PREVIOUS LEAD RELATED REPORTS OR RECORDS, IF ANY, WILL BE NOTED IN EITHER THIS SECTION OR IN THE RISK ASSESSMENT DATA COLLECTION FORMS.

SCOPE OF WORK – THE DAMAGED ADDRESS WAS EVALUATED FOR OTHER THE PRIMARY RESIDENCE. OUTBUILDINGS, FENCES, GARAGES, SHEDS OR OTHER PAINTED, STAINED, SHELLACKED OR VARNISHED ELEMENTS AT THE DAMAGED ADDRESS WERE NOT PART OF THE ASSIGNMENT. THE APPLICANT IF THEY HAVE CONCERNS RELATED TO ELEMENTS BEYOND THE SCOPE OF WORK SHALL TREAT THOSE AREAS AS REGULATED AND UTILIZE LEAD-SAFE WORK PRACTICES OR HAVE THEIR CONTRACTOR UTILIZE LEAD-SAFE WORK PRACTICE IF THE SURFACE COATING WILL BE DISTURBED.

THIS REPORT HAS NOT AND CANNOT DETERMINE THE EMPLOYER’S, PROPERTY OWNER’S, CONTRACTOR’S OR MANAGEMENT COMPANY’S OCCUPATIONAL SAFETY AND HEALTH ADMINISTRATION (OSHA) LEAD IN CONSTRUCTION STANDARD REQUIREMENTS. EMPLOYERS MUST COMPLY WITH THE LEAD IN CONSTRUCTION STANDARD UNTIL SUCH TIME AS OBJECTIVE DATA AND/OR NEGATIVE EXPOSURE ASSESSMENTS DETERMINE THE STANDARD DOES NOT APPLY.

HUD FORM 5.6 "QUESTIONNAIRE FOR A LEAD HAZARD RISK ASSESSMENT OF MORE THAN FOUR RENTAL DWELLING UNITS" AND HUD FORM 5.7 "FORMAT FOR AN EXECUTIVE SUMMARY OF A LEAD HAZARD RISK ASSESSMENT" WERE NOT COMPLETED WITH THE APPLICANT DUE TO THE JOB SITE DESIGNATION AS AN OWNER-OCCUPIED PROPERTY.

THE SURVEY IS LIMITED TO READILY ACCESSIBLE AREAS OF THE RESIDENTIAL DWELLING UNIT. PROGRAM REQUIREMENTS DO NOT INCLUDE OUTBUILDINGS, FENCING OR NON-LIVING SPACE ASSOCIATED WITH THE DWELLING UNIT.

ALL DISPLAYED TIMES ARE EASTERN TIME.

Appendix C: XRF Sampling

C - 1: XRF Data by Area

C - 2: XRF Risk Assessor/Evaluators Manufacturers Training Certificate

C - 3: XRF Performance Characteristic Sheet

C - 4: XRF State Radioactive Materials License (Available Upon Written Request)

C - 5: XRF Calibration Checks/Field Validation Results

C - 1: XRF Data by Area

Damaged Address:	4 DELAWARE ST BATON ROUGE, LA 70805	Lead-based Paint Standard:	>= 1mg/cm²; >=0.5% by wt.
		Account ID:	101042

Feature	Component	Substrate	Wall	Rep #	Side	Loc	Color	Condition	XRF Reading (mg/cm²)	XRF Result	Paint Chip Result (mg/cm²)	Final Classification
Building:	4 DELAWARE ST	**Area:**	Exterior	**Room Equivalent:**	Building Exterior 1	Floor	1					
ID:	98b82d7d-76ce-45b9-840f-aee3b3d936e4	**Barcode:**	N/A	**Date:**	07/05/17	**XRF Serial #:**	M7-343	**Evaluator:**	Thomas, Jerry			
Building Entrance	Door Surround	Wood	A	0	NEUTRAL	UC	WHITE	MINIMAL DETERIORATION	1.2	Positive	N/A	**Positive**
ID:	5c2e0ab9-6ba0-4fd8-ae68-72675e4e1eb6	**Barcode:**	N/A	**Date:**	07/05/17	**XRF Serial #:**	M7-343	**Evaluator:**	Thomas, Jerry			
Window	Shutters	Wood	A	0	NEUTRAL	MR	GREEN	MINIMAL DETERIORATION	1.0	Positive	N/A	**Positive**
ID:	b10c9905-ceb2-4549-bb3d-2f0d00c9c24e	**Barcode:**	N/A	**Date:**	07/05/17	**XRF Serial #:**	M7-343	**Evaluator:**	Thomas, Jerry			
Window	Shutters	Wood	A	0	NEUTRAL	MC	GREEN	INTACT	1.7	Positive	N/A	**Positive**
Building:	4 DELAWARE ST	**Area:**	Interior	**Room Equivalent:**	Bathroom 1	Floor	1					
ID:	8c7d2553-d9ca-43b8-9478-5ab7eefd22e5	**Barcode:**	N/A	**Date:**	07/05/17	**XRF Serial #:**	M7-343	**Evaluator:**	Thomas, Jerry			
Room	Ceiling	Drywall	N/A	0	NEUTRAL	ML	WHITE	INTACT	0.0	Negative	N/A	Negative
ID:	40bd07c0-288f-4d12-8ea7-49b4689d2686	**Barcode:**	N/A	**Date:**	07/05/17	**XRF Serial #:**	M7-343	**Evaluator:**	Thomas, Jerry			
Room	Wall	Drywall	A	0	NEUTRAL	UC	WHITE	INTACT	(0.3)	Negative	N/A	Negative
ID:	6dc0adea-c838-4e5a-a568-d3878f13c6fe	**Barcode:**	N/A	**Date:**	07/05/17	**XRF Serial #:**	M7-343	**Evaluator:**	Thomas, Jerry			
Room	Wall	Drywall	B	0	NEUTRAL	MC	WHITE	INTACT	(0.2)	Negative	N/A	Negative

C - 1: XRF Data by Area

Damaged Address:	4 DELAWARE ST BATON ROUGE, LA 70805	Lead-based Paint Standard:	>= 1mg/cm²; >=0.5% by wt.
		Account ID:	101042

Feature	Component	Substrate	Wall	Rep #	Side	Loc	Color	Condition	XRF Reading (mg/cm²)	XRF Result	Paint Chip Result (mg/cm²)	Final Classification
Building:	4 DELAWARE ST	**Area:**	Interior	**Room Equivalent:**	Bathroom 1	**Floor**	1					
ID:	f9db9c2c-2f1f-4129-8a16-91ace82e1f25	**Barcode:**	N/A	**Date:**	07/05/17	**XRF Serial #:**	M7-343	**Evaluator:**	Thomas, Jerry			
Room	Wall	Drywall	C	0	NEUTRAL	UC	WHITE	INTACT	(0.1)	Negative	N/A	Negative
ID:	a4eac200-54f5-455a-85d4-be3855e44753	**Barcode:**	N/A	**Date:**	07/05/17	**XRF Serial #:**	M7-343	**Evaluator:**	Thomas, Jerry			
Room	Wall	Drywall	D	0	NEUTRAL	ML	WHITE	INTACT	(0.1)	Negative	N/A	Negative
ID:	255beff8-0f34-42ed-8cdc-4306f1d9d21a	**Barcode:**	N/A	**Date:**	07/05/17	**XRF Serial #:**	M7-343	**Evaluator:**	Thomas, Jerry			
Room Equivalent Entrance	Casing	Wood	C	0	NEUTRAL	MR	WHITE	INTACT	(0.2)	Negative	N/A	Negative
ID:	1bb5ce43-f6b4-459e-b92b-621c0ed6fbb2	**Barcode:**	N/A	**Date:**	07/05/17	**XRF Serial #:**	M7-343	**Evaluator:**	Thomas, Jerry			
Room Equivalent Entrance	Door	Wood	C	0	NEUTRAL	MC	WHITE	INTACT	(0.4)	Negative	N/A	Negative
ID:	61484e54-42b5-49a4-99c0-c0c7c411eb2f	**Barcode:**	N/A	**Date:**	07/05/17	**XRF Serial #:**	M7-343	**Evaluator:**	Thomas, Jerry			
Room Equivalent Entrance	Frame	Wood	C	0	NEUTRAL	ML	WHITE	INTACT	(0.3)	Negative	N/A	Negative
Building:	4 DELAWARE ST	**Area:**	Interior	**Room Equivalent:**	Bedroom 1	**Floor**	1					
ID:	89f604f7-64ad-4b97-97cc-5f346065505b	**Barcode:**	N/A	**Date:**	07/05/17	**XRF Serial #:**	M7-343	**Evaluator:**	Thomas, Jerry			
Closet	Wall	Drywall	A	0	NEUTRAL	MC	WHITE	INTACT	(0.1)	Negative	N/A	Negative

C - 1: XRF Data by Area

Damaged Address:	4 DELAWARE ST BATON ROUGE, LA 70805	Lead-based Paint Standard:	>= 1mg/cm²; >=0.5% by wt.
		Account ID:	101042

Feature	Component	Substrate	Wall	Rep #	Side	Loc	Color	Condition	XRF Reading (mg/cm²)	XRF Result	Paint Chip Result (mg/cm²)	Final Classification
Building:	4 DELAWARE ST	**Area:**	Interior		**Room Equivalent:**		Bedroom 1		**Floor**	1		
ID:	ef751c2e-298d-4456-8b8f-6356a4a2f4e4	**Barcode:**	N/A	**Date:**	07/05/17	**XRF Serial #:**	M7-343	**Evaluator:**	Thomas, Jerry			
Closet	Wall	Drywall	B	0	NEUTRAL	MC	WHITE	INTACT	(0.2)	Negative	N/A	Negative
ID:	d45337c7-8732-4fd4-8752-e92958799072	**Barcode:**	N/A	**Date:**	07/05/17	**XRF Serial #:**	M7-343	**Evaluator:**	Thomas, Jerry			
Closet	Wall	Drywall	C	0	NEUTRAL	UC	WHITE	INTACT	(0.3)	Negative	N/A	Negative
ID:	5a532c9b-f405-4fd8-a312-5cec34c9bdd1	**Barcode:**	N/A	**Date:**	07/05/17	**XRF Serial #:**	M7-343	**Evaluator:**	Thomas, Jerry			
Closet	Wall	Drywall	D	0	NEUTRAL	MC	WHITE	INTACT	(0.2)	Negative	N/A	Negative
ID:	a8c16a5c-3089-4ee8-9930-81cafe8be3f1	**Barcode:**	N/A	**Date:**	07/05/17	**XRF Serial #:**	M7-343	**Evaluator:**	Thomas, Jerry			
Dwelling Entrance	Casing	Wood	D	0	NEUTRAL	ML	WHITE	INTACT	(0.1)	Negative	N/A	Negative
ID:	db397e0d-b5be-4217-912c-58d21eb30388	**Barcode:**	N/A	**Date:**	07/05/17	**XRF Serial #:**	M7-343	**Evaluator:**	Thomas, Jerry			
Dwelling Entrance	Door	Metal	D	0	NEUTRAL	MC	WHITE	INTACT	(0.4)	Negative	N/A	Negative
ID:	e02183f7-9fdf-4f0a-ac47-3ef7347f431e	**Barcode:**	N/A	**Date:**	07/05/17	**XRF Serial #:**	M7-343	**Evaluator:**	Thomas, Jerry			
Dwelling Entrance	Frame	Wood	D	0	NEUTRAL	ML	WHITE	INTACT	(0.2)	Negative	N/A	Negative
ID:	a1983b7e-aef7-4b2c-b061-ab8ba075c3f5	**Barcode:**	N/A	**Date:**	07/05/17	**XRF Serial #:**	M7-343	**Evaluator:**	Thomas, Jerry			
Room	Ceiling	Drywall	N/A	0	NEUTRAL	MC	WHITE	INTACT	0.0	Negative	N/A	Negative

C - 1: XRF Data by Area

Damaged Address:	4 DELAWARE ST BATON ROUGE, LA 70805	Lead-based Paint Standard:	>= 1mg/cm²; >=0.5% by wt.
		Account ID:	101042

Feature	Component	Substrate	Wall	Rep #	Side	Loc	Color	Condition	XRF Reading (mg/cm²)	XRF Result	Paint Chip Result (mg/cm²)	Final Classification
Building:	4 DELAWARE ST	**Area:**	Interior	**Room Equivalent:**	Bedroom 1	**Floor**	1					
ID:	7df6f312-1996-4d88-b49d-77434019ebc9	**Barcode:**	N/A	**Date:**	07/05/17	**XRF Serial #:**	M7-343	**Evaluator:**	Thomas, Jerry			
Room	Wall	Drywall	A	0	NEUTRAL	MC	WHITE	INTACT	(0.1)	Negative	N/A	Negative
ID:	6504380a-173c-48bb-8d9c-a6b6b550b4ea	**Barcode:**	N/A	**Date:**	07/05/17	**XRF Serial #:**	M7-343	**Evaluator:**	Thomas, Jerry			
Room	Wall	Drywall	B	0	NEUTRAL	MC	WHITE	INTACT	(0.2)	Negative	N/A	Negative
ID:	8ed68a3e-dc3a-4e0c-a678-577ad4ea97fc	**Barcode:**	N/A	**Date:**	07/05/17	**XRF Serial #:**	M7-343	**Evaluator:**	Thomas, Jerry			
Room	Wall	Drywall	C	0	NEUTRAL	MC	WHITE	INTACT	0.0	Negative	N/A	Negative
ID:	1a2fde6a-f5dc-41fa-a329-50c3c5dcfcba	**Barcode:**	N/A	**Date:**	07/05/17	**XRF Serial #:**	M7-343	**Evaluator:**	Thomas, Jerry			
Room	Wall	Drywall	D	0	NEUTRAL	MC	WHITE	INTACT	0.0	Negative	N/A	Negative
ID:	88342b1e-d5bd-4bb7-b055-063a833b602c	**Barcode:**	N/A	**Date:**	07/05/17	**XRF Serial #:**	M7-343	**Evaluator:**	Thomas, Jerry			
Window	Sill	Wood	A	0	NEUTRAL	LC	WHITE	INTACT	0.0	Negative	N/A	Negative
Building:	4 DELAWARE ST	**Area:**	Interior	**Room Equivalent:**	Bedroom 2	**Floor**	1					
ID:	0f23e1bb-0e1b-4634-8749-59301e084383	**Barcode:**	N/A	**Date:**	07/05/17	**XRF Serial #:**	M7-343	**Evaluator:**	Thomas, Jerry			
Closet	Wall	Drywall	A	0	NEUTRAL	MC	WHITE	INTACT	0.0	Negative	N/A	Negative
ID:	952aa47f-8dd6-449b-9f80-e7ca77c55ba5	**Barcode:**	N/A	**Date:**	07/05/17	**XRF Serial #:**	M7-343	**Evaluator:**	Thomas, Jerry			
Closet	Wall	Drywall	B	0	NEUTRAL	MC	WHITE	INTACT	(0.1)	Negative	N/A	Negative

C - 1: XRF Data by Area

Damaged Address:	4 DELAWARE ST BATON ROUGE, LA 70805	Lead-based Paint Standard:	>= 1mg/cm²; >=0.5% by wt.
		Account ID:	[illegible]

Feature	Component	Substrate	Wall	Rep #	Side	Loc	Color	Condition	XRF Reading (mg/cm²)	XRF Result	Paint Chip Result (mg/cm²)	Final Classification
Building:	4 DELAWARE ST	**Area:**			Interior			**Room Equivalent:**		Bedroom 1		Floor 1
ID:	ae27bc35-1498-472b-899c-8dd3d71869a8		**Barcode:**		N/A	**Date:**	07/05/17	**XRF Serial #:**	M7-343	**Evaluator**:	Thomas, Jerry	
Closet	Wall	Drywall	C	0	NEUTRAL	MR	WHITE	INTACT	0.2	Negative	N/A	Negative
ID:	8dfae904-8181-471d-8b4b-78389632d2d4		**Barcode:**		N/A	**Date:**	07/05/17	**XRF Serial #:**	M7-343	**Evaluator**:	Thomas, Jerry	
Closet	Wall	Drywall	D	0	NEUTRAL	MC	WHITE	INTACT	(0.1)	Negative	N/A	Negative
ID:	2b063f7e-257b-4fb7-a910-9245090c6639		**Barcode:**		N/A	**Date:**	07/05/17	**XRF Serial #:**	M7-343	**Evaluator**:	Thomas, Jerry	
Room	Ceiling	Drywall	N/A	0	NEUTRAL	MC	WHITE	INTACT	0.0	Negative	N/A	Negative
ID:	26690bdf-9c63-4bbb-9621-5cf181e615e0		**Barcode:**		N/A	**Date:**	07/05/17	**XRF Serial #:**	M7-343	**Evaluator**:	Thomas, Jerry	
Room	Wall	Drywall	A	0	NEUTRAL	MC	WHITE	INTACT	(0.1)	Negative	N/A	Negative
ID:	e2c65d18-9fc2-4f38-a817-79874a7d9acd		**Barcode:**		N/A	**Date:**	07/05/17	**XRF Serial #:**	M7-343	**Evaluator**:	Thomas, Jerry	
Room	Wall	Drywall	B	0	NEUTRAL	MC	WHITE	INTACT	(0.1)	Negative	N/A	Negative
ID:	f112516a-c048-4bf6-9a39-789d957712ca		**Barcode:**		N/A	**Date:**	07/05/17	**XRF Serial #:**	M7-343	**Evaluator:**	Thomas, Jerry	
Room	Wall	Drywall	C	0	NEUTRAL	MC	WHITE	INTACT	(0.3)	Negative	N/A	Negative
ID:	44ec26ad-bd16-4e2d-86a3-74bcc0662d8c		**Barcode:**		N/A	**Date:**	07/05/17	**XRF Serial #:**	M7-343	**Evaluator**:	Thomas, Jerry	
Room	Wall	Drywall	D	0	NEUTRAL	MC	WHITE	INTACT	0.0	Negative	N/A	Negative
ID:	35f0fce2-cf56-4218-b07f-891cb2d626f9		**Barcode:**		N/A	**Date:**	07/05/17	**XRF Serial #:**	M7-343	**Evaluator**:	Thomas, Jerry	
Window	Sill	Wood	D	0	NEUTRAL	LC	WHITE	INTACT	(0.2)	Negative	N/A	Negative

C - 1: XRF Data by Area

Damaged Address:	4 DELAWARE ST BATON ROUGE, LA 70805	Lead-based Paint Standard:	>= 1mg/cm²; >=0.5% by wt.
		Account ID:	101042

Feature	Component	Substrate	Wall	Rep #	Side	Loc	Color	Condition	XRF Reading (mg/cm²)	XRF Result	Paint Chip Result (mg/cm²)	Final Classification
Building:	4 DELAWARE ST	**Area:**	Interior		**Room Equivalent:**		Bedroom 3		**Floor:**	1		
ID:	b8654f09-96c4-4a07-9c72-a1e56aafbb94	**Barcode:**	N/A	**Date:**	07/05/17	**XRF Serial #:**	M7-343	**Evaluator:**	Thomas, Jerry			
Closet	Wall	Drywall	A	0	NEUTRAL	MC	WHITE	INTACT	(0.1)	Negative	N/A	Negative
ID:	4b034b9a-2c58-470c-b7c9-12b4aec78b5c	**Barcode:**	N/A	**Date:**	07/05/17	**XRF Serial #:**	M7-343	**Evaluator:**	Thomas, Jerry			
Closet	Wall	Drywall	B	0	NEUTRAL	MC	WHITE	INTACT	(0.2)	Negative	N/A	Negative
ID:	310ed4f0-ddc5-4283-be30-ba12ed0316f5	**Barcode:**	N/A	**Date:**	07/05/17	**XRF Serial #:**	M7-343	**Evaluator:**	Thomas, Jerry			
Closet	Wall	Drywall	C	0	NEUTRAL	UC	WHITE	INTACT	0.0	Negative	N/A	Negative
ID:	13bed5eb-c0e0-44e7-91cb-a6f1c2e703b8	**Barcode:**	N/A	**Date:**	07/05/17	**XRF Serial #:**	M7-343	**Evaluator:**	Thomas, Jerry			
Closet	Wall	Drywall	D	0	NEUTRAL	MR	WHITE	INTACT	(0.2)	Negative	N/A	Negative
ID:	fd900e33-2079-4138-a941-49e48275666f	**Barcode:**	N/A	**Date:**	07/05/17	**XRF Serial #:**	M7-343	**Evaluator:**	Thomas, Jerry			
Room	Ceiling	Drywall	N/A	0	NEUTRAL	UL	WHITE	INTACT	(0.2)	Negative	N/A	Negative
ID:	4c467f84-0f7b-462f-b0e1-83034b00026e	**Barcode:**	N/A	**Date:**	07/05/17	**XRF Serial #:**	M7-343	**Evaluator:**	Thomas, Jerry			
Room	Wall	Drywall	A	0	NEUTRAL	MC	WHITE	INTACT	0.0	Negative	N/A	Negative
ID:	6f59abca-5217-44d9-b035-6f359624e11b	**Barcode:**	N/A	**Date:**	07/05/17	**XRF Serial #:**	M7-343	**Evaluator:**	Thomas, Jerry			
Room	Wall	Drywall	B	0	NEUTRAL	MC	WHITE	INTACT	(0.3)	Negative	N/A	Negative
ID:	f0f246da-12c4-4161-81f4-9b35a5283c13	**Barcode:**	N/A	**Date:**	07/05/17	**XRF Serial #:**	M7-343	**Evaluator:**	Thomas, Jerry			
Room	Wall	Drywall	C	0	NEUTRAL	MC	WHITE	INTACT	0.0	Negative	N/A	Negative

C - 1: XRF Data by Area

Damaged Address:	4 DELAWARE ST BATON ROUGE, LA 70805	Lead-based Paint Standard:	>= 1mg/cm²; >=0.5% by wt.
		Account ID:	101042

Feature	Component	Substrate	Wall	Rep #	Side	Loc	Color	Condition	XRF Reading (mg/cm²)	XRF Result	Paint Chip Result (mg/cm²)	Final Classification
Building:	4 DELAWARE ST		**Area:**		Interior			**Room Equivalent:**		Bedroom 3		**Floor:** 1
ID:	6b01ab58-e1ae-403a-b5a3-84e98109b17e		**Barcode:**		N/A	**Date:**	07/05/17	**XRF Serial #:**	M7-343	**Evaluator:**	Thomas, Jerry	
Room	Wall	Drywall	D	0	NEUTRAL	MC	WHITE	INTACT	(0.1)	Negative	N/A	Negative
ID:	4ce1a91d-5f10-47ea-9179-b063cdd246d5		**Barcode:**		N/A	**Date:**	07/05/17	**XRF Serial #:**	M7-343	**Evaluator:**	Thomas, Jerry	
Room Equivalent Entrance	Casing	Wood	C	0	NEUTRAL	MR	WHITE	INTACT	0.0	Negative	N/A	Negative
ID:	f50e1515-cd8c-41b1-a370-6c49f4a9ebdd		**Barcode:**		N/A	**Date:**	07/05/17	**XRF Serial #:**	M7-343	**Evaluator:**	Thomas, Jerry	
Room Equivalent Entrance	Door	Wood	C	0	NEUTRAL	MC	WHITE	INTACT	(0.3)	Negative	N/A	Negative
ID:	7436fdc5-3731-4df5-9a99-0fa9add251b7		**Barcode:**		N/A	**Date:**	07/05/17	**XRF Serial #:**	M7-343	**Evaluator:**	Thomas, Jerry	
Room Equivalent Entrance	Frame	Wood	C	0	NEUTRAL	ML	WHITE	INTACT	(0.2)	Negative	N/A	Negative
Building:	4 DELAWARE ST		**Area:**		Interior			**Room Equivalent:**		Bedroom 4		**Floor** 1
ID:	e95443ed-e549-4589-b32a-22475f3d1811		**Barcode:**		N/A	**Date:**	07/05/17	**XRF Serial #:**	M7-343	**Evaluator:**	Thomas, Jerry	
Room	Ceiling	Drywall	N/A	0	NEUTRAL	MC	WHITE	INTACT	(0.1)	Negative	N/A	Negative
ID:	6fdc2162-4c22-405d-b8b9-0ca2b230669b		**Barcode:**		N/A	**Date:**	07/05/17	**XRF Serial #:**	M7-343	**Evaluator:**	Thomas, Jerry	
Room	Wall	Drywall	A	0	NEUTRAL	MC	WHITE	INTACT	0.0	Negative	N/A	Negative

C - 1: XRF Data by Area

Damaged Address:	4 DELAWARE ST BATON ROUGE, LA 70805	Lead-based Paint Standard:	>= 1mg/cm²; >=0.5% by wt.
		Account ID:	101042

Feature	Component	Substrate	Wall	Rep #	Side	Loc	Color	Condition	XRF Reading (mg/cm²)	XRF Result	Paint Chip Result (mg/cm²)	Final Classification
Building:	4 DELAWARE ST		**Area:**		Interior			**Room Equivalent:**		Bedroom 4		**Floor:** 1
ID:	c79bd595-04dd-464e-9520-b7b7ba679b69		**Barcode:**		N/A	**Date:**	07/05/17	**XRF Serial #:**	M7-343	**Evaluator:**	Thomas, Jerry	
Room	Wall	Drywall	B	0	NEUTRAL	MC	WHITE	INTACT	(0.3)	Negative	N/A	Negative
ID:	c947747d-c470-40b1-9992-d0d6e2ce26d4		**Barcode:**		N/A	**Date:**	07/05/17	**XRF Serial #:**	M7-343	**Evaluator:**	Thomas, Jerry	
Room	Wall	Drywall	C	0	NEUTRAL	ML	WHITE	INTACT	(0.1)	Negative	N/A	Negative
ID:	4b05495a-513a-453b-baee-836fac6bf458		**Barcode:**		N/A	**Date:**	07/05/17	**XRF Serial #:**	M7-343	**Evaluator:**	Thomas, Jerry	
Room	Wall	Drywall	D	0	NEUTRAL	MR	WHITE	INTACT	0.0	Negative	N/A	Negative
ID:	5aa6594b-c676-4ce6-93ab-6441a1cf5686		**Barcode:**		N/A	**Date:**	07/05/17	**XRF Serial #:**	M7-343	**Evaluator:**	Thomas, Jerry	
Window	Sill	Wood	C	0	NEUTRAL	LC	WHITE	INTACT	(0.2)	Negative	N/A	Negative
Building:	4 DELAWARE ST		**Area:**		Interior			**Room Equivalent:**		Kitchen 1		**Floor:** 1
ID:	e6099de9-0fd8-40a9-a1a7-421c830245e1		**Barcode:**		N/A	**Date:**	07/05/17	**XRF Serial #:**	M7-343	**Evaluator:**	Thomas, Jerry	
Closet	Wall	Drywall	A	0	NEUTRAL	MC	WHITE	INTACT	(0.1)	Negative	N/A	Negative
ID:	d7785a1d-a660-4604-865e-8787560f7115		**Barcode:**		N/A	**Date:**	07/05/17	**XRF Serial #:**	M7-343	**Evaluator:**	Thomas, Jerry	
Closet	Wall	Drywall	B	0	NEUTRAL	MC	WHITE	INTACT	(0.2)	Negative	N/A	Negative
ID:	83138a25-d277-47d8-95d9-220bb3299786		**Barcode:**		N/A	**Date:**	07/05/17	**XRF Serial #:**	M7-343	**Evaluator:**	Thomas, Jerry	
Closet	Wall	Drywall	C	0	NEUTRAL	UC	WHITE	INTACT	0.0	Negative	N/A	Negative

C - 1: XRF Data by Area

Damaged Address:	4 DELAWARE ST BATON ROUGE, LA 70805	Lead-based Paint Standard:	>= 1mg/cm²; >=0.5% by wt.
		Account ID:	101042

Feature	Component	Substrate	Wall	Rep #	Side	Loc	Color	Condition	XRF Reading (mg/cm²)	XRF Result	Paint Chip Result (mg/cm²)	Final Classification
Building:	4 DELAWARE ST	**Area:**	Interior		**Room Equivalent:**		Kitchen 1		**Floor:**	1		
ID:	1ddcdef9-6cba-4c20-9f82-b12497e57cc3	**Barcode:**	N/A	**Date:**	07/05/17	**XRF Serial #:**	M7-343	**Evaluator:**	Thomas, Jerry			
Closet	Wall	Drywall	D	0	NEUTRAL	ML	WHITE	INTACT	0.0	Negative	N/A	Negative
ID:	a2f0c87a-edf0-4794-a5da-dc7733310fc9	**Barcode:**	N/A	**Date:**	07/05/17	**XRF Serial #:**	M7-343	**Evaluator:**	Thomas, Jerry			
Room	Ceiling	Drywall	N/A	0	NEUTRAL	ML	WHITE	INTACT	0.0	Negative	N/A	Negative
ID:	98165fab-7c2a-4e1b-b884-6e323696a1da	**Barcode:**	N/A	**Date:**	07/05/17	**XRF Serial #:**	M7-343	**Evaluator:**	Thomas, Jerry			
Room	Wall	Drywall	A	0	NEUTRAL	MR	WHITE	INTACT	0.1	Negative	N/A	Negative
ID:	552e72da-6b48-42d8-903b-0a52294764ef	**Barcode:**	N/A	**Date:**	07/05/17	**XRF Serial #:**	M7-343	**Evaluator:**	Thomas, Jerry			
Room	Wall	Drywall	B	0	NEUTRAL	MC	WHITE	INTACT	0.0	Negative	N/A	Negative
ID:	36bd216e-825f-42a1-ba04-b8acf76adaa6	**Barcode:**	N/A	**Date:**	07/05/17	**XRF Serial #:**	M7-343	**Evaluator:**	Thomas, Jerry			
Room	Wall	Drywall	C	0	NEUTRAL	ML	WHITE	INTACT	(0.2)	Negative	N/A	Negative
ID:	6434f7e9-60c8-4173-8864-4f2f10eb1fba	**Barcode:**	N/A	**Date:**	07/05/17	**XRF Serial #:**	M7-343	**Evaluator:**	Thomas, Jerry			
Room	Wall	Drywall	D	0	NEUTRAL	ML	WHITE	INTACT	(0.2)	Negative	N/A	Negative
ID:	4fecacd6-dd2f-4e63-b8d6-2381bd37c9dd	**Barcode:**	N/A	**Date:**	07/05/17	**XRF Serial #:**	M7-343	**Evaluator:**	Thomas, Jerry			
Window	Sill	Wood	D	0	NEUTRAL	LC	WHITE	INTACT	(0.1)	Negative	N/A	Negative

C - 1: XRF Data by Area

Damaged Address:	4 DELAWARE ST BATON ROUGE, LA 70805	Lead-based Paint Standard:	>= 1mg/cm²; >=0.5% by wt.
		Account ID:	101042

Feature	Component	Substrate	Wall	Rep #	Side	Loc	Color	Condition	XRF Reading (mg/cm²)	XRF Result	Paint Chip Result (mg/cm²)	Final Classification
Building:	4 DELAWARE ST	**Area:**	Interior		**Room Equivalent:**		Living Room 1		**Floor:**	1		
ID:	b232f412-d2a1-4fdb-aec3-8cddb7ddba8c		**Barcode:**	N/A	**Date:**	07/05/17	**XRF Serial #:**	M7-343	**Evaluator:**	Thomas, Jerry		
Dwelling Entrance	Casing	Metal	C	0	NEUTRAL	MC	WHITE	INTACT	(0.1)	Negative	N/A	Negative
ID:	f3f95a0a-c044-43b7-a1c3-9e5bc567cfef		**Barcode:**	N/A	**Date:**	07/05/17	**XRF Serial #:**	M7-343	**Evaluator:**	Thomas, Jerry		
Dwelling Entrance	Door	Metal	C	0	NEUTRAL	MC	WHITE	INTACT	(0.4)	Negative	N/A	Negative
ID:	3a1d7db9-7194-4f56-848f-cc77ff01b6a5		**Barcode:**	N/A	**Date:**	07/05/17	**XRF Serial #:**	M7-343	**Evaluator:**	Thomas, Jerry		
Dwelling Entrance	Frame	Wood	C	0	NEUTRAL	ML	WHITE	INTACT	(0.2)	Negative	N/A	Negative
ID:	8086bab4-802e-49fa-afb7-eb89ede4dee0		**Barcode:**	N/A	**Date:**	07/05/17	**XRF Serial #:**	M7-343	**Evaluator:**	Thomas, Jerry		
Room	Ceiling	Drywall	N/A	0	NEUTRAL	ML	WHITE	INTACT	(0.1)	Negative	N/A	Negative
ID:	91d5ecfc-9c06-486a-899a-755bfd8534d0		**Barcode:**	N/A	**Date:**	07/05/17	**XRF Serial #:**	M7-343	**Evaluator:**	Thomas, Jerry		
Room	Wall	Drywall	A	0	NEUTRAL	MC	WHITE	INTACT	(0.1)	Negative	N/A	Negative
ID:	dc8a949b-25cc-41a6-9325-3d7e98dec22a		**Barcode:**	N/A	**Date:**	07/05/17	**XRF Serial #:**	M7-343	**Evaluator:**	Thomas, Jerry		
Room	Wall	Drywall	B	0	NEUTRAL	MC	WHITE	INTACT	(0.2)	Negative	N/A	Negative
ID:	48d046b5-d469-47b6-8af2-b73485af5651		**Barcode:**	N/A	**Date:**	07/05/17	**XRF Serial #:**	M7-343	**Evaluator:**	Thomas, Jerry		
Room	Wall	Drywall	C	0	NEUTRAL	MC	WHITE	INTACT	(0.3)	Negative	N/A	Negative

C - 1: XRF Data by Area

Damaged Address:	4 DELAWARE ST BATON ROUGE, LA 70805	Lead-based Paint Standard:	>= 1mg/cm²; >=0.5% by wt.
		Account ID:	101042

Feature	Component	Substrate	Wall	Rep #	Side	Loc	Color	Condition	XRF Reading (mg/cm²)	XRF Result	Paint Chip Result (mg/cm²)	Final Classification
Building:	4 DELAWARE ST	**Area:**	Interior		**Room Equivalent:**		Living Room 1		**Floor:**	1		
ID:	b8c9b51f-f840-4f1c-82c4-ffc2e5ccc57a	**Barcode:**	N/A	**Date:**	07/05/17	**XRF Serial #:**	M7-343	**Evaluator:**	Thomas, Jerry			
Room	Wall	Drywall	D	0	NEUTRAL	MC	WHITE	INTACT	(0.2)	Negative	N/A	Negative
ID:	b6f8d9f0-ec89-48ae-9ae9-e47565b08c8d	**Barcode:**	N/A	**Date:**	07/05/17	**XRF Serial #:**	M7-343	**Evaluator:**	Thomas, Jerry			
Window	Sill	Wood	C	0	NEUTRAL	LC	WHITE	INTACT	(0.2)	Negative	N/A	Negative
Building:	4 DELAWARE ST	**Area:**	Exterior		**Room Equivalent:**		Building Exterior 1		**Floor:**	1		
ID:	d6b80253-4cf3-4ad5-bc06-ab7cf9351b41	**Barcode:**	N/A	**Date:**	07/05/17	**XRF Serial #:**	M7-343	**Evaluator:**	Thomas, Jerry			
Building Entrance	Header	Wood	A	0	NEUTRAL	UC	WHITE	INTACT	0.4	Negative	N/A	Negative
ID:	f6060461-7178-4c46-9237-39e20fff3a22	**Barcode:**	N/A	**Date:**	07/05/17	**XRF Serial #:**	M7-343	**Evaluator:**	Thomas, Jerry			
Building Entrance	Header	Wood	A	0	NEUTRAL	MC	WHITE	INTACT	0.6	Negative	N/A	Negative
ID:	355e4c94-9a78-4ca8-be2f-16f226e7c320	**Barcode:**	N/A	**Date:**	07/05/17	**XRF Serial #:**	M7-343	**Evaluator:**	Thomas, Jerry			
Building Entrance	Header	Wood	A	0	NEUTRAL	MR	WHITE	INTACT	0.3	Negative	N/A	Negative
ID:	cd9e478b-1059-4d65-91f5-0a5825d26680	**Barcode:**	N/A	**Date:**	07/05/17	**XRF Serial #:**	M7-343	**Evaluator:**	Thomas, Jerry			
Other Exterior	Siding	Masonry	A	0	NEUTRAL	MR	WHITE	INTACT	0.1	Negative	N/A	Negative
ID:	3754dcd7-7be0-4e00-a1b1-ae1e78513b6f	**Barcode:**	N/A	**Date:**	07/05/17	**XRF Serial #:**	M7-343	**Evaluator:**	Thomas, Jerry			
Other Exterior	Siding	Wood	B	0	NEUTRAL	MR	WHITE	INTACT	0.0	Negative	N/A	Negative

C - 1: XRF Data by Area

Damaged Address:	4 DELAWARE ST BATON ROUGE, LA 70805	Lead-based Paint Standard:	>= 1mg/cm²; >=0.5% by wt.
		Account ID:	101042

Feature	Component	Substrate	Wall	Rep #	Side	Loc	Color	Condition	XRF Reading (mg/cm²)	XRF Result	Paint Chip Result (mg/cm²)	Final Classification
Building:	4 DELAWARE ST	**Area:**	Exterior		**Room Equivalent:**		Building Exterior 1		**Floor:**	1		
ID:	2e0abfa8-d320-4070-8ca7-a9af4e23d5a4	**Barcode:**	N/A	**Date:**	07/05/17	**XRF Serial #:**	M7-343	**Evaluator:**	Thomas, Jerry			
Other Exterior	Siding	Wood	C	0	NEUTRAL	MC	WHITE	INTACT	0.0	Negative	N/A	Negative
ID:	1d89c202-e5bf-4feb-b9c2-9883e0b24f6d	**Barcode:**	N/A	**Date:**	07/05/17	**XRF Serial #:**	M7-343	**Evaluator:**	Thomas, Jerry			
Other Exterior	Siding	Masonry	D	0	NEUTRAL	MC	WHITE	INTACT	0.2	Negative	N/A	Negative
ID:	9a478ca1-5f5c-4347-9167-3638c1977f49	**Barcode:**	N/A	**Date:**	07/05/17	**XRF Serial #:**	M7-343	**Evaluator:**	Thomas, Jerry			
Roof	Fascia	Wood	B	0	NEUTRAL	MR	WHITE	INTACT	(0.1)	Negative	N/A	Negative
ID:	ba75196c-7671-4c18-8d78-678120e1db70	**Barcode:**	N/A	**Date:**	07/05/17	**XRF Serial #:**	M7-343	**Evaluator:**	Thomas, Jerry			
Roof	Soffit	Wood	B	0	NEUTRAL	MR	WHITE	INTACT	(0.2)	Negative	N/A	Negative
ID:	87735efe-ab6a-47a0-9009-f9554e953989	**Barcode:**	N/A	**Date:**	07/05/17	**XRF Serial #:**	M7-343	**Evaluator:**	Thomas, Jerry			
Window	Casing	Wood	A	0	NEUTRAL	LC	WHITE	INTACT	0.0	Negative	N/A	Negative

C - 2: XRF Risk Assessor/Evaluators Manufacturers Training Certificate

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Certificate of Achievement

This is to certify that

Masoud Safari-Zanjani

PSI

on the 15th of June 2017

successfully completed the factory training for

Protec Instrument Corporation XRF Lead Paint Inspection System

Including, but not limited to, the topics of Radiation Safety, DOT Regulations, Haz-Mat Security Awareness, and the Proper Use of the Instrument.

Verena Streber, President
Protec Instrument Corporation
38 Edge Hill Road, Waltham, MA 02451

C - 3: XRF Performance Characteristic Sheet

An XRF Performance Characteristic Sheet defines acceptable operating specifications and procedures for each model of x-ray Fluorescence (XRF) lead-based paint analyzer. The make/brand and the model number for each XRF used in this lead-based paint survey are listed in this report in Appendix C - 3, XRF Calibration Documentation. The lead-based paint inspector/risk assessor was required to follow the XRF Performance Characteristic Sheet for the survey activities described in this report.

The Performance Characteristic Sheet for most XRF models is posted on the U.S. Department of Housing and Urban Development's Office of Healthy Homes and Lead Hazard Control website, specifically, on the web page for the "HUD Guidelines for the Evaluation and Control of Lead-based Paint Hazards in Housing". (When this lead evaluation report was written, the web page was http://www.hud.gov/offices/lead/lbp/hudguidelines/allpcs.pdf) HUD has determined that the information provided in the Performance Characteristic Sheets it has posted to its website is acceptable when used as guidance in conjunction with Chapter 7, Lead-based Paint Inspection, of HUD's Guidelines.

Readers interested in the operating specifications and procedures for the XRF(s) used can download the Performance Characteristic Sheet(s) from the web page above, or they can obtain the sheet(s) from the National Lead Information Clearinghouse, at 800-424-LEAD (toll-free). Persons with hearing or speech impediments may access the above telephone number via TTY by calling the toll-free Federal Information Relay Service at (800) 877-8339.

C - 4: XRF State Radioactive Materials License

Available Upon Written Request

C - 5: XRF Calibration Checks/Field Validation Results

Reading Date	7-5-2017	Risk Assessor:	Zanjani, Masoud

XRF Manufacturer	XRF Model	Serial #
RMD	LPA-1	M7-343

Initial Calibration Validations	
Time of Initial Readings:	17:53

Surface Readings	
SRM #	Actual Value
2573	1
	1
	1
2570	0.0
	0.0
	0.0

Final Calibration Validations	
Time of Final Readings:	19:18

Surface Readings	
SRM #	Actual Value
2573	1
	1
	1
2570	0.0
	0.0
	0.0

Appendix D: Paint Condition Data

D - 1: Lead-based Paint in Locations of Deteriorated Paint (Requiring Lead-safe Work Practices and Clearance Testing)

D - 1: Lead-based Paint in Locations of Deteriorated Paint (Requiring Lead-safe Work Practices and Clearance Testing)

Damaged Address:	4 DELAWARE ST			Account ID:	101042
Building Designation:	4 DELAWARE ST	Area:	Property Common Area	Designation:	Exterior

Room Equivalent	Feature	Substrate	Component	Cause of Deterioration	Teeth Marks
Building Exterior 1	Building Entrance	Wood	Door Surround	cracking	No
Building Exterior 1	Window	Wood	Shutters	cracking	No

Appendix E: Dust Wipe Sample Analytical Data

E - 1: Dust Wipe Sampling Laboratory Results

E - 2: Summary of the Total Number of Separate Testing Combinations Sampled for Dust-lead

E - 1: Dust Wipe Sampling Laboratory Results

Damaged Address:	4 DELAWARE ST BATON ROUGE, LA	Dust-lead Standard - Floor:	>= 40 micrograms per square foot
		Dust-lead Standard - Sill:	>= 250 micrograms per square foot
		Lab Method:	EPA SW846,7000
Account ID:	101042		

Room Equivalent	Feature	Component	Substrate	Dimensions (inches)	Detection Limit	Detection Limit Units	Lab Result	Units	Classification (Individual)
Building:	4 DELAWARE ST		**Unit:**			Interior			
Sample: 22467076	**Date:** 7/5/2017	**Evaluator:**			Thomas, Jerry				
Bedroom 1	Room	Floor	Concrete	12 x 12	5	µg/ft²	31.93	µg/ft²	Negative
Sample: 22467079	**Date:** 7/5/2017	**Evaluator:**			Thomas, Jerry				
Bedroom 1	Window	Sill	Wood	12 x 3	20	µg/ft²	575.9	µg/ft²	**Positive**
Sample: 22467077	**Date:** 7/5/2017	**Evaluator:**			Thomas, Jerry				
Bedroom 2	Room	Floor	Concrete	12 x 12	5	µg/ft²	44.41	µg/ft²	**Positive**
Sample: 22467074	**Date:** 7/5/2017	**Evaluator:**			Thomas, Jerry				
Bedroom 4	Room	Floor	Concrete	12 x 12	5	µg/ft²	21.71	µg/ft²	Negative
Sample: 22467080	**Date:** 7/5/2017	**Evaluator:**			Thomas, Jerry				
Bedroom 4	Window	Sill	Wood	12 x 3	20	µg/ft²	52.48	µg/ft²	Negative
Sample: 22467075	**Date:** 7/5/2017	**Evaluator:**			Thomas, Jerry				
Kitchen 1	Room	Floor	Concrete	12 x 12	5	µg/ft²	31.42	µg/ft²	Negative

N/D = NOT DETECTABLE

Note: Laboratory results have been rounded to two decimal places.

E - 1: Dust Wipe Sampling Laboratory Results

Damaged Address:	4 DELAWARE ST BATON ROUGE, LA	Dust-lead Standard - Floor:	>= 40 micrograms per square foot
		Dust-lead Standard - Sill:	>= 250 micrograms per square foot
		Lab Method:	EPA SW846,7000
Account ID:	101042		

Room Equivalent	Feature	Component	Substrate	Dimensions (inches)	Detection Limit	Detection Limit Units	Lab Result	Units	Classification (Individual)
Building:	**4 DELAWARE ST**		**Unit:**			**Interior**			
Sample: 22467073	**Date:** 7/5/2017	**Evaluator:**			Thomas, Jerry				
Living Room 1	Dwelling Entrance	Floor	Concrete	12 x 12	5	µg/ft²	42.18	µg/ft²	**Positive**
Sample: 22467078	**Date:** 7/5/2017	**Evaluator:**			Thomas, Jerry				
Living Room 1	Window	Sill	Wood	12 x 3	20	µg/ft²	48.54	µg/ft²	Negative

N/D = NOT DETECTABLE

Note: Laboratory results have been rounded to two decimal places.

E - 2: Summary of the Total Number of Separate Testing Combinations Sampled for Dust-lead

Damaged Address:	4 DELAWARE ST BATON ROUGE, LA 70805		Account ID:	101042		
		Testing Combination		Total # of Dust Wipes	Average Analysis Result (µg/ft²)	Dust-lead Hazard in Area
Building	Area	Feature	Component			
4 DELAWARE ST	Unit Interior	Dwelling Entrance	Concrete Floor	1	42.2	**Yes**
4 DELAWARE ST	Unit Interior	Room	Concrete Floor	4	32.4	No
4 DELAWARE ST	Unit Interior	Window	Sill	3	225.6	No

Appendix F: Soil Sample Analytical Data

F - 1: Soil Sampling Data Summary Sheet

F - 1: Soil Sampling Data Summary Sheet *

Damaged Address:	**4 DELAWARE ST BATON ROUGE, LA 70805**	**Soil-lead Standard - Play Area:**	**>= 400 ppm**
		Soil-lead Standard - Bare Soil:	**>= 1200 ppm**
		Lab Method:	**EPA SW846,7420**
Account ID:	**101042**		

Sample Location	Building	Mass Tested	Mass Unit	Detection Limit	Detection Limit Units	Lab Result	Units	Classification
Sample: 22466004	**Evaluator:**			Thomas, Jerry				
DRIPLINE	4 DELAWARE ST	0.286	g	17.48	PPM	153.76	PPM	Negative

* The samples are to be obtained from bare soil only. The Contractor, if required, collected sub samples from bare soil only. The soil samples, when obtained, are given a Building identifier for sampling identification. If you review the drawing it will indicate the sub samples came from different sub-locations and are composited into a sample.

N/D = NOT DETECTABLE

Appendix G: Paint Chip Sample Analytical Data

G - 1: Paint Chip Sampling Data Summary Sheet

G - 1: Paint Chip Sampling Data Summary Sheet

Damaged Address:	4 DELAWARE ST BATON ROUGE, LA 70805	Lead-based Paint Standard: Lab Method:	1 milligrams per square centimeter EPA SW846,7420
Account ID:	101042		

None collected.

N/D = NOT DETECTABLE

Appendix H: Quality Control Data Results

XRF Unit: M7-343

Retest Tolerance Limit (RTL): 0.3 **Average Original:** -0.1 **Average Retest:** -0.1 **QA Result:** Pass

#	Building	Unit	Room	Feature	Component	Substrate	Original	Retest
1	4 DELAWARE ST	Interior	Bathroom 1	Room	Ceiling	Drywall	0	-0.1
2	4 DELAWARE ST	Interior	Bathroom 1	Room	Wall	Drywall	-0.3	-0.2
3	4 DELAWARE ST	Interior	Bedroom 1	Closet	Wall	Drywall	-0.1	-0.3
4	4 DELAWARE ST	Interior	Bedroom 1	Closet	Wall	Drywall	-0.2	-0.2
5	4 DELAWARE ST	Interior	Bedroom 2	Closet	Wall	Drywall	0.2	0.1
6	4 DELAWARE ST	Interior	Bedroom 2	Room	Ceiling	Drywall	0	0
7	4 DELAWARE ST	Interior	Bedroom 4	Room	Ceiling	Drywall	-0.1	0
8	4 DELAWARE ST	Interior	Bedroom 4	Room	Wall	Drywall	-0.3	-0.2
9	4 DELAWARE ST	Interior	Bedroom 4	Window	Sill	Wood	-0.2	-0.1
10	4 DELAWARE ST	Interior	Kitchen 1	Room	Wall	Drywall	0.1	0

Sample Type: DUST

Sample	Evaluator	Known Value	Analytical Result	QC Result	Tolerance Limit Percentage
22466001	Thomas,Jerry	200	185.43	Pass	20
22466002	Thomas,Jerry	0	0	Pass	20

N/D = NOT DETECTABLE

Appendix H: Quality Control Data Results

Sample Type: SOIL

Sample	Evaluator	Known Value	Analytical Result	QC Result	Tolerance Limit Percentage
22466003	Thomas,Jerry	400	415.65	Pass	20

N/D = NOT DETECTABLE

Appendix I: Certifications, Licenses, and Accreditations

I - 1: Lead-based Paint Inspector and Risk Assessor's License/Certification Information

I - 2: Firm's Lead Activity License Certification Information

I - 3: Laboratory National Lead Laboratory Accreditation Program (NLLAP) Accreditation information

I - 1: Lead-based Paint Inspector and Risk Assessor's License/Certification Information

LEAD-BASED PAINT INSPECTOR/RISK ASSESSOR SUMMARY

Name	State	Certification #	Expiration
Thomas,Jerry	LA	JR206726	6/3/2018

STATE OF LOUISIANA

DEPARTMENT OF ENVIRONMENTAL QUALITY

certifies that

Jerry Thomas

Has complied with all requirements of the Louisiana Department of Environmental Quality and is authorized to perform the duties of

Lead Risk Assessor

Accreditation No. **BR106726** **AI No.** **206726**

Date of Issuance **June 9, 2017** **Expiration** **June 3, 2018**

Failure to comply with all applicable provisions of La. R.S. 2025.E. (1)(a) and La. R.S. 2025.F. (2)(a) may result in civil and/or criminal enforcement actions by the State.

Christopher A Maynard

Public Participation & Permit Support Division
Office of Environmental Services

I - 2: Copy of Firm's Lead Activity License/Certification

Not required by Louisiana Department of Environmental Quality.

I - 3: Laboratory NLLAP Accreditation Information

Laboratory Certification Summary

Laboratory NLLAP Accreditation Certificate

The Environmental Lead Laboratory Accreditation Program (ELLAP) is an approved lead laboratory accreditation program under the Environmental Protection Agency's (EPA) National Lead Laboratory Accreditation Program (NLLAP).

The American Industrial Hygiene Association (AIHA) and American Association for Laboratory Accreditation (A2LA) have a Memorandum of Understanding (MOU) with the EPA, which recognizes AIHA and A2LA as approved laboratory accrediting organizations working in cooperation with the EPA NLLAP. Laboratories which are accredited by AIHA or A2LA for the analysis of lead in the matrices of paint chips, dust and soil will be recognized by the NLLAP as being capable of performing adequate analysis for lead in the matrix or matrices for which it has been accredited under AIHA or A2LA.

Laboratory Certification Summary

Laboratory Name	Phone #	Contact Name	Contact Title	NLLAP Accreditation #:	NLLAP Accreditation Start:	NLLAP Accreditation Expiration:	Laboratory accredited for each medium analyzed?
ACCURATE ANALYTICAL TESTING LLC	(734) 699-5227	ANDREW THEYS	Certification Contact	100986	5/31/2017	7/1/2019	Yes - Dust/Soil/Paint

May 31, 2017

Laboratory ID: 100986

Robert Theys
Accurate Analytical Testing, LLC
30105 Beverly Road
Romulus, MI 48174

Dear Mr. Theys:

Congratulations! The AIHA Laboratory Accreditation Programs (AIHA-LAP), LLC's Analytical Accreditation Board (AAB) has approved Accurate Analytical Testing, LLC as an accredited Environmental Lead laboratory.

Accreditation documentation includes the ELLAP accreditation certificate, scope of accreditation document and a copy of the current AIHA-LAP, LLC license agreement (if your completed agreement is not on file at AIHA-LAP, LLC). The accreditation symbol has been designed for use by all AIHA-LAP, LLC accredited laboratories. If your laboratory chooses to use the symbol in its advertising the laboratory's accreditation, you must complete and return the AIHA-LAP, LLC license agreement to a Laboratory Accreditation Specialist. Once submitted, an electronic copy of the accreditation symbol will be sent to you. Please inform us if your laboratory does not wish to use the symbol in advertising.

Laboratory accreditation shall be maintained by continued compliance with ELLAP requirements *(see Policy Modules 2C and 6)*, which includes proficient participation in AIHA-LAP, LLC approved proficiency testing, demonstration of competency, or round robin program as indicated on the AIHA-LAP "Approved PT and Round Robin" webpage, its associated Scope/PT table, and as required in Policy Module 6, for all Fields of Testing (FoTs) for which the laboratory is accredited. An accredited laboratory that wishes to expand into a new FoT must submit an updated accreditation application to AIHA-LAP, LLC for review by the AAB.

Any changes in ownership, laboratory location, personnel, FoTs/Methods, or significant procedural changes shall be reported to AIHA-LAP, LLC in writing within twenty (20) business days of the change.

The accreditation certificate is the property of AIHA-LAP, LLC and must be returned to us should your laboratory withdraw or be removed from the ELLAP.

Again, congratulations. If you have any questions, please contact Lauren Schnack, Senior Specialist, Quality and Accreditation, at (703) 846-0716.

Sincerely,

Cheryl O. Morton

Cheryl O. Morton
Managing Director
AIHA Laboratory Accreditation Programs, LLC

AIHA Laboratory Accreditation Programs, LLC

acknowledges that

Accurate Analytical Testing, LLC

30105 Beverly Road, Romulus, MI 48174

Laboratory ID: 100986

along with all premises from which key activities are performed, as listed above, has fulfilled the requirements of the AIHA Laboratory Accreditation Programs (AIHA-LAP), LLC accreditation to the ISO/IEC 17025:2005 international standard, *General Requirements for the Competence of Testing and Calibration Laboratories* in the following:

LABORATORY ACCREDITATION PROGRAMS

☐	**INDUSTRIAL HYGIENE**	Accreditation Expires:
✓	**ENVIRONMENTAL LEAD**	Accreditation Expires: July 01, 2019
☐	**ENVIRONMENTAL MICROBIOLOGY**	Accreditation Expires:
☐	**FOOD**	Accreditation Expires:
☐	**UNIQUE SCOPES**	Accreditation Expires:

Specific Field(s) of Testing (FoT)/Method(s) within each Accreditation Program for which the above named laboratory maintains accreditation is outlined on the attached **Scope of Accreditation**. Continued accreditation is contingent upon successful on-going compliance with ISO/IEC 17025:2005 and AIHA-LAP, LLC requirements. This certificate is not valid without the attached **Scope of Accreditation**. Please review the AIHA-LAP, LLC website (www.aihaaccreditedlabs.org) for the most current Scope.

William Walsh, CIH
Chairperson, Analytical Accreditation Board

Cheryl O. Morton
Managing Director, AIHA Laboratory Accreditation Programs, LLC

Revision 15: 03/30/2016

Date Issued: 05/31/2017

AIHA Laboratory Accreditation Programs, LLC
SCOPE OF ACCREDITATION

Accurate Analytical Testing, LLC
30105 Beverly Road, Romulus , MI 48174

Laboratory ID: **100986**
Issue Date: 05/31/2017

The laboratory is approved for those specific field(s) of testing/methods listed in the table below. Clients are urged to verify the laboratory's current accreditation status for the particular field(s) of testing/Methods, since these can change due to proficiency status, suspension and/or withdrawal of accreditation.

The EPA recognizes the AIHA-LAP, LLC ELLAP program as meeting the requirements of the National Lead Laboratory Accreditation Program (NLLAP) established under Title X of the Residential Lead-Based Paint Hazard Reduction Act of 1992 and includes paint, soil and dust wipe analysis. Air and composited wipes analyses are not included as part of the NLLAP.

Environmental Lead Laboratory Accreditation Program (ELLAP)

Initial Accreditation Date: 02/01/2004

Field of Testing (FoT)	Technology sub-type/ Detector	Method	Method Description (*for internal methods only*)
Paint		EPA SW-846 3050	
		EPA SW-846 7000	
		EPA SW-846 7420	
Soil		EPA SW-846 3050	
		EPA SW-846 7000	
		EPA SW-846 7420	
Settled Dust by Wipe		EPA SW-846 7000	
		NIOSH 7082	
Airborne Dust		EPA SW-846 7000	
		NIOSH 7082	

A complete listing of currently accredited Environmental Lead laboratories is available on the AIHA-LAP, LLC website at: http://www.aihaaccreditedlabs.org

Appendix J: Maintenance and Reevaluation

Proper maintenance of properties containing lead-based paint is an important part of an Owner's overall lead hazard control plan. Ongoing lead-based paint maintenance and reevaluation plans are needed to structure activities in dwelling units in which lead-based paint is known or presumed to be present. Maintaining a property in good condition with intact paint will prevent lead-based paint hazards from deteriorated paint. Hazards can also develop from improperly performed routine maintenance work or renovation activities on painted surfaces. Failure of previous lead-based paint hazard control measures and accumulation of lead dust from untreated friction or impact surfaces must also be avoided by careful monitoring and attention to ongoing building maintenance.

This Appendix provides a general overview of ongoing maintenance and reevaluation activities. As noted in section 2.5 of this evaluation report, details concerning lead-safe work practices and acceptable lead-based paint hazard control methods can be found in the HUD "Guidelines for the Evaluation and Control of Lead-based Paint Hazards in Housing." Performance requirements for ongoing maintenance and reevaluation are given in the Lead Safe Housing Rule in 24 CFR section 35.1355. Both documents are available from the Web at www.hud.gov/offices/lead.

Ongoing lead-based paint maintenance plans are often written by risk assessors and typically include the following elements:

-- visual assessments to identify deteriorated paint or possible hazards
-- reevaluation by a certified risk assessor, and limited dust testing
-- lead hazard control of all identified hazards, whether previously existing or new.

Visual assessments for this purpose are the responsibility of the Owner. These visual assessments must be performed at unit turnover and every 12 months. Individuals performing visual assessments for this purpose must be trained in visual assessment. There is a self-paced, online course available through HUD's Web site at www.hud.gov/offices/lead/training. Visual assessments should confirm that all known or suspected lead-based paint is intact, that lead-based paint hazard control actions are stable, that structural problems do not threaten the integrity of any remaining known or suspected lead-based paint, and that areas of bare soil have not developed. Please note that Owner-conducted visual assessments are different from reevaluations performed by risk assessors (see next paragraph).

A reevaluation is a specialized type of risk assessment that identifies deteriorated paint surfaces and deteriorated or failed interim controls of lead-based paint hazards, encapsulation, or enclosure treatments. The reevaluation must also include limited soil, dust, and deteriorated paint sampling and provision of recommendations for correction of hazards. The first reevaluation shall be conducted no later than 2 years from completion of hazard reduction. Subsequent reevaluation shall be conducted at intervals of 2 years. Rules for exemption from this reevaluation schedule can be found in the Lead Safe Housing Rule at 24 CFR section 35.1355(b)(1). (The rule can be downloaded from the HUD website at www.hud.gov/offices/lead.)

The Owner must provide each dwelling unit with a written notice asking residents to report deteriorated paint and, if applicable, failure of existing lead hazard control treatments, including the name, address, and telephone number of the person whom residents should contact. The language of the notice shall be in accordance with the Lead Safe Housing Rule at 24 CFR section 35.125(c)(3). The Owner must respond to reports received from residents, and stabilize the deteriorated paint or repair the enclosure or encapsulation within 30 days. The Owner must also respond to the reevaluation risk assessment by performing interim controls on all lead-based paint hazards identified by the reevaluation. Interim controls that are required may be incorporated into maintenance or renovation activities if performed by properly trained workers. Interim control measures performed as part of ongoing lead-based paint maintenance are considered complete when closure is achieved in accordance with the Lead Safe Housing Rule at 24 CFR section 35.1340.

Table H-1: Standard Reevaluation Schedule

Required Activities	Performed By	Action Taken	Reevaluation Frequency and Duration	Required Maintenance Activities
Visual Assessment	Owner or Owner's Representative	Visual assessment for deteriorated paint, bare soil, and the failure of any hazard reduction measures.	At unit turnover and every 12 months.	Activities to be performed depend on recommendation of risk assessor; specific responses are not dictated by the Lead Safe Housing Rule. All deteriorated lead-based paint in interior and exterior surfaces shall be stabilized [as per section 35.1330(a)(b)]. All bare soil shall be treated with standard treatments [as per section 35.1335(d)-(g)] or interim controls [as per section 35.1330(a) & (f)]. Any encapsulation or enclosure that has failed shall be repaired, or interim controls or abatement shall be performed [as per section 35.1325 or 35.1330, respectively]. Workers must be trained in Lead Safe Work Practices. If amount of paint to be disturbed by the maintenance work exceeds the de minimis (small or minimal) amounts, safe work practices shall be used and closure achieved. Worksite closure shall be performed at the conclusion of repair, abatement or interim control activities [as per section 35.1340].
Reevaluation	Certified Risk Assessor	Reevaluation	Two years following hazard reduction activities. Then at 2-year intervals. If two consecutive reevaluations are conducted that do not identify failed hazard controls or lead-based paint hazards, structure(s) are exempt from further reevaluations.	Risk assessor will provide options for lead hazard control for failed treatments of previously identified hazards, paint stabilization, and options for treating newly identified hazards.

1) Individuals who perform the assessment must be trained in visual assessment. See the HUD lead web site at http://www.hud.gov/offices/lead for the on-line visual assessment training course and additional information.

All lead-based paint hazards identified during reevaluation must be treated. Examples of control measures are included in this report. The Property Owner must incorporate ongoing lead-based paint maintenance and reevaluation into regular building operations (unless all lead -based paint or lead-based paint components are removed). More information is available from a certified risk assessor, the HUD lead website (www.hud.gov/offices/lead), or the State or local lead authority or regulatory agency.

It is evident from this report that lead-based paint hazards are preventable. Maintaining a property in good condition and keeping paint on surfaces intact are the most effective ways to reduce potential for exposure to lead-based paint hazards.

You may contact your State lead poisoning prevention program or lead-control agency, housing authority, codes department, or other applicable agency for additional local/regional regulations and procedures governing reevaluation activities. A list of State lead contacts is available through the National Conference of State Legislature's Web site at www.ncsl.org, and at the Lead Listing's Web site at www.leadlisting.org.

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Appendix K: Laboratory Documentation

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ACCURATE ANALYTICAL TESTING LLC

30105 Beverly Road
Romulus, MI 48174
Ph: 734-629-8161; Fax: 734-629-8431

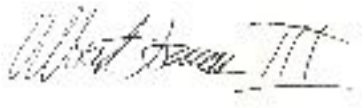
Certificate of Analysis: Lead In Dust Wipe by EPA Method 7000B/3050B*

Client :	FINBACK 670			**AAT Project :**	352178
	2492 Kings Gate Lane-The Heritage at Dunes West			**Sampling Date :**	07/05/2017
	Mount Pleasant, SC 29466			**Date Received :**	07/07/2017
Attn :	Patrick T. Connor	**Email :**	pconnor@finback670.com	**Date Analyzed :**	07/07/2017
Phone :	888-776-0670	**Fax :**	877-776-0670	**Date Reported :**	7/8/2017 10:18:41AM

Project Location : 4 DELAWARE ST

Lab Sample ID	Client Code	Length (inch)	Width (inch)	Area (Sq ft)	Results Lead µg/ft2 *
3329167	22466001	12	12	1.00	185.43
3329168	22466002	12	12	1.00	<5.00
3329194	22467073	12	12	1.00	42.18
3329195	22467074	12	12	1.00	21.71
3329196	22467075	12	12	1.00	31.42
3329197	22467076	12	12	1.00	31.93
3329198	22467077	12	12	1.00	44.41
3329199	22467078	12	3	0.25	48.54
3329200	22467079	12	3	0.25	575.90
3329201	22467080	12	3	0.25	52.48

Analyst Signature



Albert Sowers

Ricky Perez

ND = Not Detected, N/A = Not Available, RL = Reporting Limit, Analytical Reporting Limit is 5 ug/sample. For true values assume (2) significant figures. AAT internal SOP S205/S207. The method and batch QC are acceptable unless otherwise stated.

EPA Regulatory Limits: 40 ug/ft2 (Floors, Carpeted/Uncarpeted), 250 ug/ft2 (Window Sill/Stools), 400 ug/ft2 (Window Trough/Well/Ext Concrete Surfaces). HUD Regulatory Limits: 10 ug/ft2 (Interior Floors), 40 ug/ft2 (Porch Floors), 100 ug/ft2 (Window Sills), 100 ug/ft2 (Window Troughs).

The laboratory operates in accord with ISO 17025 guidelines and holds limited scopes of accreditation under AIHA-LAP and NY State DOH ELAP programs. These results are submitted pursuant to AAT, LLC current terms and conditions of sale, including the company's standard warranty and limitation of liability provisions. Analytical results relate to the samples as received by the lab. AAT will not assume any liability or responsibility for the manner in which the results are used or interpreted. All Quality control requirements for the samples this report contains have been met. AAT does not blank correct reported values. * = Validated modified method Sample data apply only to items analyzed. Reproduction of this document other than in its entirety is not authorized by AAT, LLC. Samples are stored for 30 days following report date.

AIHA LAP- Lab ID #100986, NY State DOH ELAP -Lab ID #11864, State of Ohio- Lab ID # 10042

Date Printed: 07/08/2017 AAT Project: 352178

ACCURATE ANALYTICAL TESTING LLC

30105 Beverly Road
Romulus, MI 48174
Ph: 734-629-8161; Fax: 734-629-8431

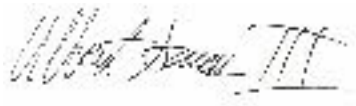
Certificate of Analysis: Lead In Soil by EPA SW-846 7420 and 3050B Method*

Client :	FINBACK 670			**AAT Project :**	352178
	2492 Kings Gate Lane-The Heritage at Dunes West			**Sampling Date :**	07/05/2017
	Mount Pleasant, SC 29466			**Date Received :**	07/07/2017
Attn :	Patrick T. Connor	**Email :**	pconnor@finback670.com	**Date Analyzed :**	07/08/2017
Phone :	888-776-0670	**Fax :**	877-776-0670	**Date Reported :**	7/8/2017 10:18:41AM

Project Location : 4 DELAWARE ST

Lab Sample ID	Client Code	Results Lead µg/g (PPM)	Calculated RL µg/g *
3329169	22466003	415.65	5.00
3329170	22466004	153.76	17.48

Analyst Signature



Albert Sowers

Ricky Perez

*RL= Reporting Limit * For true values assume (2) significant figures. The method and batch QC are acceptable unless otherwise stated. Current EPA/HUD Interim Standard for soil samples are: 400 PPM (parts per million) for play area's, 1200 PPM for building Perimters and 1000 PPM for California Building Perimeters. AAT internal sop S204. The laboratory operates in accord with ISO 17025 guidelines and holds limited scopes of accreditation under AIHA-LAP and NY State DOH ELAP programs. These results are submitted pursuant to AAT LLC current terms and conditions of sale, including the company's standard warranty and limitation of liability provisions. Analytical results relate to the samples as received by the lab. AAT will not assume any liability or responsibility for the manner in which the results are used or interpreted. Reproduction of this document other than in its entirety is not permitted. AAT does not blank correct reported values. Sample data apply only to items analyzed.
*= Validated modified method

AIHA LAP- Lab ID #100986, NY State DOH ELAP -Lab ID #11864, State of Ohio- Lab ID # 10042

ACCURATE ANALYTICAL TESTING LLC

30105 Beverly Road
Romulus, MI 48174
Ph: 734-629-8161; Fax: 734-629-8431

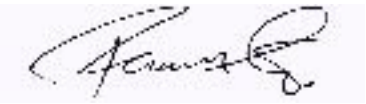
To : FINBACK 670
2492 Kings Gate Lane-The Heritage at Dunes West
Mount Pleasant, SC 29466

Attn : Patrick T. Connor **Email :** pconnor@finback670.com
Phone : 888-776-0670

Project Location : 4 DELAWARE ST

AAT Project : 352178
Client Project : 7476000000
Date Reported : 7/8/2017 10:18:41AM

Sample	Client Code	Analysis Requested	Completed	Analyst
3329167	22466001	Dust Wipe	07/07/2017	Ricky Perez
3329168	22466002	Dust Wipe	07/07/2017	Ricky Perez
3329169	22466003	Lead Soil	07/08/2017	Albert Sowers
3329170	22466004	Lead Soil	07/08/2017	Albert Sowers
3329194	22467073	Dust Wipe	07/07/2017	Ricky Perez
3329195	22467074	Dust Wipe	07/07/2017	Ricky Perez
3329196	22467075	Dust Wipe	07/07/2017	Ricky Perez
3329197	22467076	Dust Wipe	07/07/2017	Ricky Perez
3329198	22467077	Dust Wipe	07/07/2017	Ricky Perez
3329199	22467078	Dust Wipe	07/07/2017	Ricky Perez
3329200	22467079	Dust Wipe	07/07/2017	Ricky Perez
3329201	22467080	Dust Wipe	07/07/2017	Ricky Perez



Reviewed By Quality Assurance Coordinator - Robert A Theys

AIHA LAP- Lab ID #100986, NY State DOH ELAP -Lab ID #11864, State of Ohio- Lab ID # 10042

Electronic Chain of Custody

30105 Beverly Road
Romulus, MI 48174
Ph: 734-629-8161; Fax: 734-629-8431

Submitting Client : FINBACK 670
2492 Kings Gate Lane-The Heritage at Dunes West
Mount Pleasant, SC - 29466

AAT Project : **352178**

Project Location : 4 DELAWARE ST

Lab Sample I	Client Code	Sample Type	Time Recorded	Ship Date	Ship Method	Waybill
3329167	22466001	Dust Wipe	7/5/2017 7:14:09 PM	07/05/2017	FedEx	740713437504
3329168	22466002	Dust Wipe	7/5/2017 7:14:58 PM	07/05/2017	FedEx	740713437504
3329169	22466003	Lead Soil	7/5/2017 7:15:35 PM	07/05/2017	FedEx	740713437504
3329170	22466004	Lead Soil	7/5/2017 7:17:33 PM	07/05/2017	FedEx	740713437504
3329194	22467073	Dust Wipe	7/5/2017 6:57:33 PM	07/05/2017	FedEx	740713437504
3329195	22467074	Dust Wipe	7/5/2017 6:59:32 PM	07/05/2017	FedEx	740713437504
3329196	22467075	Dust Wipe	7/5/2017 7:01:33 PM	07/05/2017	FedEx	740713437504
3329197	22467076	Dust Wipe	7/5/2017 7:03:31 PM	07/05/2017	FedEx	740713437504
3329198	22467077	Dust Wipe	7/5/2017 7:06:55 PM	07/05/2017	FedEx	740713437504
3329199	22467078	Dust Wipe	7/5/2017 7:08:49 PM	07/05/2017	FedEx	740713437504
3329200	22467079	Dust Wipe	7/5/2017 7:10:10 PM	07/05/2017	FedEx	740713437504
3329201	22467080	Dust Wipe	7/5/2017 7:12:00 PM	07/05/2017	FedEx	740713437504

Seal Intact: **Yes**
Preservative (if required): **Yes**
Containers Labled : **Yes**

Risk Assessor Jerry Thomas

Received By: Jill Yonts
Received Date: 07/07/2017 09:10

Analyst: Ricky Perez

Relinquished By: Robert Theys
Relinquished Date: 07/08/2017 10:38

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Appendix L: Lead and Lead Safety Resource Data

L - 1: Glossary

L - 2: Resources for Additional Information

L - 1: GLOSSARY

Abatement	A measure or set of measures designed to permanently eliminate lead-based paint hazards or lead-based paint. Abatement strategies include the removal of lead-based paint, enclosure, encapsulation, replacement of building components coated with lead-based paint, removal of lead contaminated dust, and removal of lead contaminated soil or overlaying of soil with a durable covering such as asphalt (grass and sod are considered interim control measures). All of these strategies require preparation; cleanup; waste disposal; post-abatement closure testing; recordkeeping; and, if applicable, monitoring.
Accreditation	A formal recognition certifying that an organization, such as a laboratory, is competent to carry out specific tasks or types of tests.
Accuracy	The degree of agreement between an observed value and an accepted reference value (a “true” value); a data quality indicator. Accuracy includes a combination of random errors (precision) and systematic errors (bias) due to sampling and analysis.
Bare soil	Soil not covered with grass, sod, some other similar vegetation, or paving, including the sand in sandboxes.
Building component	Any element of a building that may be painted or have dust on its surface, e.g., walls, stair treads, floors, railings, doors, windowsills, etc.
Certification	The process of testing and evaluating against certain specifications the competence of a person, organization, or other entity in performing a function or service, usually for a specified period of time.
Certified	The designation for Contractors who have completed training and other requirements to safely allow them to undertake risk assessments, inspections, or abatement work. Risk assessors, inspectors, and Abatement Contractors should be certified by the appropriate local, State, or Federal agency.
Chewable surface	See Chewed surface.
Chewed surface	Any painted surface that shows evidence of having been chewed or mouthed by a young child. A chewed surface is usually a protruding, horizontal part of a building, such as an interior windowsill.
Cleaning	The process of using a vacuum and wet cleaning agents to remove leaded dust; the process includes the removal of bulk debris from the work area. OSHA prohibits the use of compressed air to clean lead-contaminated dust from a surface.

L - 1: GLOSSARY

Closure examination	Visual examination and collection of environmental samples by an inspector or risk assessor, or, in some circumstances, a Sampling Technician, and analysis by an accredited laboratory upon completion of an abatement project, interim control intervention, or maintenance job that disturbs lead-based paint (or paint suspected of being lead-based). The closure examination is performed to ensure that lead exposure levels do not exceed standards established by the EPA Administrator pursuant to Title IV of the Toxic Substances Control Act, and that any cleaning following such work adequately meets those standards.
Common area	A room or area that is accessible to all residents in a community (e.g., hallways or lobbies); in general, any area not kept locked.
Composite sample	A single sample made up of individual subsamples. Analysis of a composite sample produces the arithmetic mean of all subsamples.
Containment	A process to protect workers and the environment by controlling exposures to the lead-contaminated dust and debris created during abatement.
Deteriorated lead-based paint	Any lead-based paint coating on a damaged or deteriorated surface or fixture, or any interior or exterior lead-based paint that is peeling, chipping, blistering, flaking, worn, chalking, alligatoring, cracking, or otherwise becoming separated from the substrate.
Disposal (of waste)	The discharge, deposit, injection, dumping, spilling, leaking, or placement of solid or liquid waste on land or in water so that none of its constituents can pollute the environment by being emitted into the air or discharged into a body of water, including groundwater.
Dripline/Foundation	The area within three feet (3') surrounding the perimeter of a building
Encapsulation	Any covering or coating that acts as a barrier between lead-based paint and the environment, the durability of which relies on adhesion and the integrity of the existing bonds between multiple layers of paint and between the paint and the substrate. See also Enclosure.
Enclosure	The use of rigid, durable construction materials that are mechanically fastened to the substrate to act as a barrier between the Lead-based paint and the environment.
Environmental Intervention Blood-Lead Level (EIBL) child	A child who has a blood lead level at or above 20 micrograms/dL (micrograms of lead per deciliter of blood) in a single test or at 15-19 micrograms/dL in two tests taken at least 3 months apart.

L - 1: GLOSSARY

Evaluation	Risk assessment, paint inspection, reevaluation, investigation, closure examination, or risk assessment screen.
Examination	See Closure examination.
Federal Register (FR)	A daily Federal publication that contains proposed and final regulations, rules, and notices.
Friction Surface	An interior or exterior surface that is subject to abrasion or friction, including, but not limited to, certain window, floor, and stair surfaces.
Garden Areas	An area of ground where plants (such as flowers or vegetables) are grown. : a public area with many plants and trees.
Impact surface	An interior or exterior surface (such as surfaces on doors) subject to damage by repeated impact or contact.
Inspection (of paint)	A surface-by-surface investigation to determine the presence of lead-based paint (in some cases including dust and soil sampling) and a report of the results.
Interim controls	A set of measures designed to temporarily reduce human exposure or possible exposure to lead-based paint hazards. Such measures include specialized cleaning, repairs, maintenance, painting, temporary containment, and management and resident education programs. Monitoring, conducted by Owners, and reevaluations, conducted by professionals, are integral elements of interim control. Interim controls include dust removal; paint film stabilization; treatment of friction and impact surfaces; installation of soil coverings, such as grass or sod; and land use controls. See also Monitoring, Reevaluation, and Abatement.
Interior windowsill	The portion of the horizontal window ledge that protrudes into the interior of the room, adjacent to the window sash when the window is closed; often called the window stool.
Latex	A waterborne emulsion paint made with synthetic binders, such as 100 percent acrylic, vinyl acrylic, terpolymer, or styrene acrylic; a stable emulsion of polymers and pigment in water.
Lead	Lead includes metallic lead and inorganic and organic compounds of lead.

L - 1: GLOSSARY

Lead-based paint	Any paint, varnish, shellac, or other coating that contains lead equal to or greater than 1.0 mg/cm2 (milligrams of lead per square centimeter of surface) as measured by XRF or laboratory analysis, or 0.5 percent by weight (5,000 micrograms, 5,000 ppm (parts per million), or 5,000 mg/kg) as measured by laboratory analysis. (Local definitions may vary.)
Lead-based paint hazard	A condition in which exposure to lead from lead-contaminated dust, lead-contaminated soil, or deteriorated lead-based paint would have an adverse effect on human health (as established by the EPA Administrator under Title IV of the Toxic Substances Control Act). Lead-based paint hazards include, for example, deteriorated lead-based paint, leaded dust levels above applicable standards, and bare leaded soil above applicable standards. Please see 40 CFR Part 745.65 for the complete definition.
Lead-based paint hazard control	Activities to control and eliminate lead-based paint hazards, including interim controls, abatement, and complete abatement.
Lead-contaminated dust	Surface dust in residences that contain an area concentration of lead in excess of the standard established by the EPA Administrator, pursuant to Title IV of the Toxic Substances Control Act. EPA standards for leaded dust for risk assessments are 40 micrograms/ft2 (micrograms of lead per square foot) on floors and 250 micrograms/ft2 on interior windowsills. The EPA standards for closure are 40 micrograms/ft2 on floors, 250 micrograms/ft2 on interior windowsills and 400 micrograms/ft2 on window troughs. The recommended standard for lead hazard screens for floors is 25 micrograms/ft2 and for windowsills is 125 micrograms/ft2.
Lead-contaminated soil	Bare soil on residential property that contains lead in excess of the standard established by the EPA Administrator, pursuant to Title IV of the Toxic Substances Control Act. The standard is 400 micrograms/g in play areas and 1200 micrograms/g in the rest of the yard.
Leaded dust	See Lead-contaminated dust.
Licensed	Holding a valid license or certification issued by EPA or by an EPA-approved State program pursuant to Title IV of the Toxic Substances Control Act. The license is based on certification for lead-based paint hazard control work. See also Certified.
Maintenance	Work intended to maintain adequate living conditions in a dwelling, which has the potential to disturb lead-based paint or paint that is suspected of being lead-based.

L - 1: GLOSSARY

Mean	The arithmetic average of a series of numerical data values; for example, the algebraic sum of the data values divided by the number of data values.
Microgram (µg)	1/1,000,000 of a gram; used to measure weight.
Monitoring	Surveillance to determine (1) that known or suspected lead-based paint is not deteriorating; (2) that lead-based paint hazard controls, such as paint stabilization, enclosure, or encapsulation have not failed; and (3) that structural problems do not threaten the integrity of hazard controls or of known or suspected.
Owner	A person, firm, corporation, guardian, conservator, receiver, trustee, executor, government agency or entity, or other judicial officer who, alone or with others, owns, holds, or controls the freehold or leasehold title or part of the title to property, with or without actually possessing it. This definition includes a vendee who possesses the title, but does not include a mortgagee or an Owner of a reversionary interest under a ground rent lease.
Paint inspector	An individual who has completed training from an accredited program and been licensed or certified by the appropriate State or local agency to (1) perform inspections to determine and report the presence of lead-based paint on a surface-by-surface basis through onsite testing, (2) report the findings of such an inspection, (3) collect environmental samples for laboratory analysis, (4) perform closure testing, and optionally (5) document successful compliance with lead-based paint hazard control requirements or standards.
Paint removal	An abatement strategy that entails the removal of lead-based paint from surfaces. For lead hazard control work, this can mean using chemicals, heat guns below 1,100° F, and certain contained abrasive methods. Open-flame burning, open-abrasive blasting, sandblasting, extensive dry scraping, and stripping in a poorly ventilated space using a volatile stripper are prohibited paint removal methods. Hydroblasting is not recommended.
Plastic	See Polyethylene plastic.
Polyethylene plastic	All references to polyethylene plastic refer to 6 mil plastic sheeting or polyethylene bags (or doubled bags if using 4 mil polyethylene bags), or any other thick plastic material shown to demonstrate at least equivalent dust containment performance. Plastic used to contain waste should be capable of completely containing the waste and, after being properly sealed, should remain leak tight with no visible signs of discharge during movement or relocation.

L - 1: GLOSSARY

Polyurethane	An exceptionally hard and wear-resistant coating (created by the reaction of polyols with a multifunctional isocyanate); often used to seal wood floors following lead-based paint hazard control work and cleaning.
Reevaluation	In lead hazard control work, the combination of a visual assessment and collection of environmental samples performed by a certified risk assessor to determine if a previously implemented lead-based paint hazard control measure is still effective and if the dwelling remains lead -safe.
Removal	See Paint removal.
Renovation	Work that involves construction and/or home or building improvement measures such as window replacement, weatherization, remodeling, and repainting.
Replacement	A strategy of abatement that entails the removal of building components coated with lead-based paint (such as windows, doors, and trim) and the installation of new components free of lead-based paint.
Resident	A person who lives in a dwelling.
Risk assessment	An onsite investigation of a residential dwelling to discover any lead-based paint hazards. Risk assessments include an investigation of the age, history, management, and maintenance of the dwelling, and the number of children under age 6 and women of childbearing age who are residents; a visual assessment; limited environmental sampling (i.e., collection of dust wipe samples, soil samples, and deteriorated paint samples); and preparation of a report identifying acceptable abatement and interim control strategies based on specific conditions.
Risk assessor	A certified individual who has completed training with an accredited training program and who has been certified to (1) perform risk assessments, (2) identify acceptable abatement and interim control strategies for reducing identified lead-based paint hazards, (3) perform closure testing and reevaluations, and (4) document the successful completion of lead-based paint hazard control activities.
Site	The land or body of water where a facility is located or an activity is conducted. The site includes adjacent land used in connection with the facility or activity.
Soil	See Bare soil.

L - 1: GLOSSARY

Spectrum analyzer	A type of XRF analyzer that provides the operator with a plot of the energy and intensity, or counts of both K and L x-ray spectra, as well as a calculated lead concentration. See also XRF analyzer.
Standard deviation	A measure of the precision of a reading; the spread of the deviation from the mean. The smaller the standard deviation, the more precise the analysis. The standard deviation is calculated by first obtaining the mean, or the arithmetic average, of all of the readings. A formula is then used to calculate how much the individual values vary from the mean-the standard deviation is the square root of the arithmetic average of the squares of the deviation from the mean. Many hand calculators have an automatic standard deviation function. See also Mean.
Subsample	A representative portion of a sample. A subsample may be either a field sample or a laboratory sample. A subsample is often combined with other subsamples to produce a composite sample. See also Composite sample.
Substrate	A surface on which paint, varnish, or other coating has been applied or may be applied. Examples of substrates include wood, plaster, metal, and drywall.
Substrate effect	The radiation returned to an XRF analyzer by the paint, substrate, or underlying material, in addition to the radiation returned by any lead present. This radiation, when counted as lead x-rays by an XRF analyzer contributes to substrate equivalent lead (bias). The inspector may have to compensate for this effect when using XRF analyzers. See also XRF analyzer.
Substrate Equivalent Lead (SEL)	The XRF measurement taken on an unpainted surface; used to calculate the corrected lead concentration on a surface by using the following formula: Apparent Lead Concentration-Substrate Equivalent Lead = Corrected Lead Concentration. See also XRF analyzer.
Target housing	Any residential unit constructed before 1978, except dwellings that do not contain bedrooms or dwellings that were developed specifically for the elderly or persons with disabilities-unless a child younger than 6 resides or is expected to reside in the dwelling. In the case of jurisdictions that banned the sale or use of lead-based paint before 1978, the Secretary of HUD may designate an earlier date for defining target housing.
Test location	A specific area on a testing combination where XRF instruments will test for lead-based paint.

L - 1: GLOSSARY

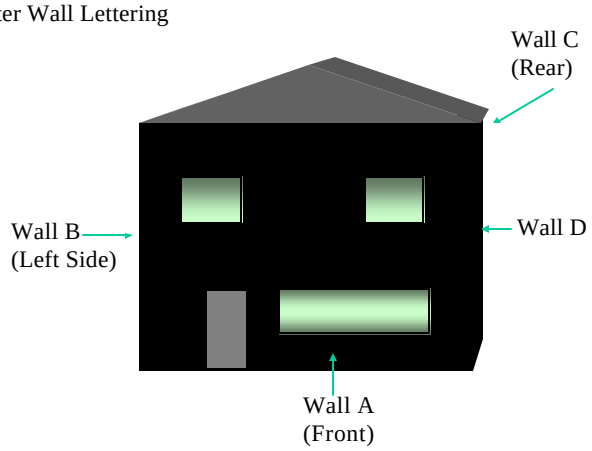
Trained	Successful completion of a training course in a particular discipline. For lead hazard control work, the training course must be accredited by EPA or by an EPA-approved State program, pursuant to Title IV of the Toxic Substances Control Act.
Treatment	In residential lead-based paint hazard control work, any method designed to control lead-based paint hazards. Treatment includes interim controls, abatement, and removal.
Trough	See Window trough.
Window trough	For a typical double-hung window, the portion of the exterior windowsill between the interior windowsill (or stool) and the frame of the storm window. If there is no storm window, the window trough is the area that receives both the upper and lower window sashes when they are both lowered. Sometimes inaccurately called the window “well.”
Windowsill	See Interior windowsill.
Worker	An individual who has completed training in an accredited program to perform Lead-based paint hazard control in housing.
Worksite	Any interior or exterior area where lead-based paint hazard control work takes place.
XRF analyzer	An instrument that determines lead concentration in milligrams per square centimeter (mg/cm2) using the principle of x-ray fluorescence (XRF). Two types of field portable XRF analyzers are used - direct readers and spectrum analyzers. For this lead-based paint inspection, the term XRF analyzer only refers to portable instruments manufactured to analyze paint, that have a HUD Performance Characteristic Sheet, and are interpreted in accordance with the Performance Characteristic Sheet; it does not refer here to laboratory grade units or portable instruments designed to analyze soil.

Wall Identification System

Perimeter Walls:

Identify perimeter wall sides with letters A, B, C and D. Side A in multifamily housing is the apartment building entry door side. Side A in a single family dwelling is the front side of the dwelling. Sides B, C, and D are identified clockwise, starting from the "9 o'clock" position from Side A as one faces the apartment building or single family dwelling; thus Side B is to the left, Side C is across from Side A, and Side D is to the right of Side A.

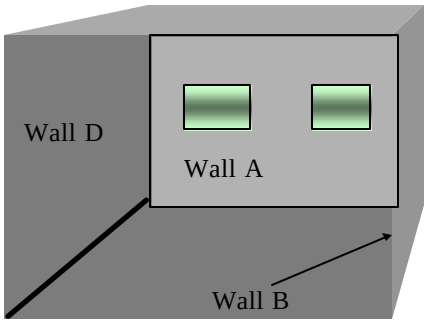
Perimeter Wall Lettering



Interior Walls:

Interior wall sides are identified with letters. Side A is the wall directly in front as one passes through the entry of each Room Equivalent. The remaining walls are identified clockwise from Side A; thus, Side A is directly in front, Side B is to the right, Side C is the wall from which you entered, and Side D is to the left.

Interior Wall Lettering



Wall C is always the wall through which you enter

Replication: The replication field is a numerical representation of the specific testing combination sampled within the room equivalent. For example, if there are two windows on wall #A, and you are testing the right window, start from left to right and mentally number the windows (i.e., 1 and 2). Thus, the window being tested within the room equivalent is window 2. **In the event that the specific testing combination does not replicate (e.g. Wall #1, ceiling, floor, etc.) this field is identified as a "0" (zero).**

Replication

Side: Side corresponds to which side of a door-related component is being tested inside (interior), as indicated by the letter "I"; or outside (exterior), as indicated by the letter "E", to the room equivalent being tested. When the side code doesn't apply for a particular testing combination, such as with walls, floors, ceilings, windows, etc., they are marked "N", indicating that "side" is not applicable.

Side is especially significant when the leased space has inside and outside areas, such as a garden-style apartment with a porch or balcony. For example, you are testing a sliding glass door that leads to a balcony of the apartment unit. Both inside and the outside of the door have a wood casing. Both sides must be tested; furthermore, when the data is compiled, both components must be associated with the apartment unit (as opposed to the inside being compiled as associated with the apartment and the exterior casing being associated with the Common Building). If, for example, the outside casing tests positive but the inside casing tests negative, both of these components are now associated with the *apartment* in the database. With the "Side" code, however, the client now knows that they have lead-based paint on only the outside casing but not on the inside. This will result in a considerable cost savings for the client should they choose to remove and replace only those casings that contain lead-based paint.

Reading Location: This further defines the sample location. Reading location consists of a two-letter code. The first code will be either a U, M or L, representing ***upper***, ***middle*** and ***lower***, respectively. The second code will be either a L, C, or R, representing ***left***, ***center*** or ***right***, respectively.

There are two components require special notice when determining U, M, L and L, C, R – room equivalent or dwelling entrance doors and ceilings.

When determining the reading location on entrance doors you use the way you enter the room as your point of reference. For example, imagine that the door is transparent so that your left and right would be the same on the interior side of the door as it would on the exterior side of the door.

When determining your reading location on a ceiling you will use the same principles as the entrance door. Your point of reference will be determined by the way you look into the room equivalent from the entrance (i.e., with wall #A directly in front of you). The entrance door and the ceiling are the only components in a room equivalent that have this special rule for determining the point of reference.

To determine reading location for all other components when inside the room equivalent, you would use the direction as you are looking at the testing area. For example, if you are looking at window or a wall, your point of reference is just as it appears -- your left is left and your right is right.

L - 2: Resources for Additional Information on Lead and Lead-based Paint Hazards

HUD Office of Healthy Homes and Hazard Control:
www.hud.gov/offices/lead
202-755-1785, ext. 104
lead_regulations@hud.gov

The Environmental Protection Agency's Lead Programs:
www.epa.gov/opptintr/lead

National Lead information Center & Clearinghouse:
1-800-424 LEAD
www.epa.gov/lead/nlic.htm

State of Louisiana
Department of Environmental Quality
www.deq.louisiana.gov

Additional Information:
Lists of recalled products containing lead: www.safetyalerts.com

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Appendix M: Photographic Documentation

EXTERIOR WALL A

EXTERIOR WALL C

Exterior - Building Exterior 1, Building Entrance, Door Surround, Wood, Wall A

Exterior - Building Exterior 1, Building Entrance, Header, Wood, Wall A

Appendix M: Photographic Documentation

Exterior - Building Exterior 1, Window, Shutters, Wood, Wall A

Exterior - Building Exterior 1, Window, Shutters, Wood, Wall A

Appendix N: Notice of Evaluation or Hazard Activities

EPA - Protect Your Family from Lead in Your Home

EPA - Renovate Right

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Notice of evaluation or hazard activities

To: **All Residents**

Date of Issuance: **7/9/2017**

Property: **4 DELAWARE ST**
BATON ROUGE, LA 70805

4 DELAWARE ST has been provided with a Lead-based Paint Survey and Risk Assessment report prepared by ACE and its subcontractor and dated 07/09/2017. The Lead-based Paint Survey and Risk Assessment was done in accordance with selected portions of the guidelines provided in HUD's "Guidelines for the Evaluation and Control of Lead-Based Paint Hazards in Housing".

Should you want to review the actual evaluation report please contact:

LINDA SMITH
4 DELAWARE ST BATON
ROUGE, LA 70805
555.555.5555

Attachments:
- Evaluation Summary
- EPA - Protect Your Family from Lead in Your Home
- EPA - Renovate Right

Evaluation Summary

Building Components with Lead-based Paint

Job Site Name:	4 DELAWARE ST			**Job Site Number:**	101042
Building Designation:	4 DELAWARE ST	**Area:**	Property Common Area	**Designation:**	Exterior

Room Equivalent	Feature	Substrate	Component
Building Exterior 1	Building Entrance	Wood	Door Surround
Building Exterior 1	Window	Wood	Shutters

Locations of Building Components with Lead-based Paint Hazards

Job Site Name:	4 DELAWARE ST	**Job Site Number:**	101042
Building Designation:	4 DELAWARE ST		
Area:	Dwelling Unit	**Designation:**	Interior
Hazard Type:	Dust-Lead		

Substrate	Component
Concrete	Dwelling Entrance Floor

Protect Your Family From Lead in Your Home

United States Environmental Protection Agency

United States Consumer Product Safety Commission

United States Department of Housing and Urban Development

June 2017

Are You Planning to Buy or Rent a Home Built Before 1978?

Did you know that many homes built before 1978 have **lead-based paint**? Lead from paint, chips, and dust can pose serious health hazards.

Read this entire brochure to learn:

- How lead gets into the body
- How lead affects health
- What you can do to protect your family
- Where to go for more information

Before renting or buying a pre-1978 home or apartment, federal law requires:

- Sellers must disclose known information on lead-based paint or lead-based paint hazards before selling a house.
- Real estate sales contracts must include a specific warning statement about lead-based paint. Buyers have up to 10 days to check for lead.
- Landlords must disclose known information on lead-based paint and lead-based paint hazards before leases take effect. Leases must include a specific warning statement about lead-based paint.

If undertaking renovations, repairs, or painting (RRP) projects in your pre-1978 home or apartment:

- Read EPA's pamphlet, *The Lead-Safe Certified Guide to Renovate Right,* to learn about the lead-safe work practices that contractors are required to follow when working in your home (see page 12).

Simple Steps to Protect Your Family from Lead Hazards

If you think your home has lead-based paint:

- Don't try to remove lead-based paint yourself.
- Always keep painted surfaces in good condition to minimize deterioration.
- Get your home checked for lead hazards. Find a certified inspector or risk assessor at epa.gov/lead.
- Talk to your landlord about fixing surfaces with peeling or chipping paint.
- Regularly clean floors, window sills, and other surfaces.
- Take precautions to avoid exposure to lead dust when remodeling.
- When renovating, repairing, or painting, hire only EPA- or state-approved Lead-Safe certified renovation firms.
- Before buying, renting, or renovating your home, have it checked for lead-based paint.
- Consult your health care provider about testing your children for lead. Your pediatrician can check for lead with a simple blood test.
- Wash children's hands, bottles, pacifiers, and toys often.
- Make sure children eat healthy, low-fat foods high in iron, calcium, and vitamin C.
- Remove shoes or wipe soil off shoes before entering your house.

Lead Gets into the Body in Many Ways

Adults and children can get lead into their bodies if they:

- Breathe in lead dust (especially during activities such as renovations, repairs, or painting that disturb painted surfaces).
- Swallow lead dust that has settled on food, food preparation surfaces, and other places.
- Eat paint chips or soil that contains lead.

Lead is especially dangerous to children under the age of 6.

- At this age, children's brains and nervous systems are more sensitive to the damaging effects of lead.
- Children's growing bodies absorb more lead.
- Babies and young children often put their hands and other objects in their mouths. These objects can have lead dust on them.

Women of childbearing age should know that lead is dangerous to a developing fetus.

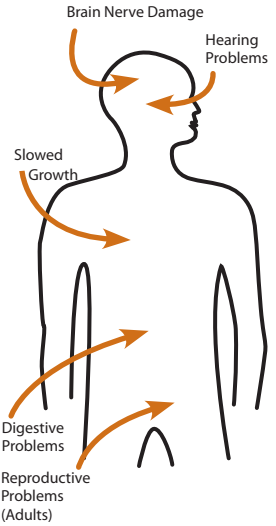
- Women with a high lead level in their system before or during pregnancy risk exposing the fetus to lead through the placenta during fetal development.

Health Effects of Lead

Lead affects the body in many ways. It is important to know that even exposure to low levels of lead can severely harm children.

In children, exposure to lead can cause:

- Nervous system and kidney damage
- Learning disabilities, attention-deficit disorder, and decreased intelligence
- Speech, language, and behavior problems
- Poor muscle coordination
- Decreased muscle and bone growth
- Hearing damage



While low-lead exposure is most common, exposure to high amounts of lead can have devastating effects on children, including seizures, unconsciousness, and in some cases, death.

Although children are especially susceptible to lead exposure, lead can be dangerous for adults, too.

In adults, exposure to lead can cause:

- Harm to a developing fetus
- Increased chance of high blood pressure during pregnancy
- Fertility problems (in men and women)
- High blood pressure
- Digestive problems
- Nerve disorders
- Memory and concentration problems
- Muscle and joint pain

Check Your Family for Lead

Get your children and home tested if you think your home has lead.

Children's blood lead levels tend to increase rapidly from 6 to 12 months of age, and tend to peak at 18 to 24 months of age.

Consult your doctor for advice on testing your children. A simple blood test can detect lead. Blood lead tests are usually recommended for:

- Children at ages 1 and 2
- Children or other family members who have been exposed to high levels of lead
- Children who should be tested under your state or local health screening plan

Your doctor can explain what the test results mean and if more testing will be needed.

Where Lead-Based Paint Is Found

In general, the older your home or childcare facility, the more likely it has lead-based paint.[1]

Many homes, including private, federally-assisted, federally-owned housing, and childcare facilities built before 1978 have lead-based paint. In 1978, the federal government banned consumer uses of lead-containing paint.[2]

Learn how to determine if paint is lead-based paint on page 7.

Lead can be found:

- In homes and childcare facilities in the city, country, or suburbs,
- In private and public single-family homes and apartments,
- On surfaces inside and outside of the house, and
- In soil around a home. (Soil can pick up lead from exterior paint or other sources, such as past use of leaded gas in cars.)

Learn more about where lead is found at epa.gov/lead.

[1] "Lead-based paint" is currently defined by the federal government as paint with lead levels greater than or equal to 1.0 milligram per square centimeter (mg/cm), or more than 0.5% by weight.

[2] "Lead-containing paint" is currently defined by the federal government as lead in new dried paint in excess of 90 parts per million (ppm) by weight.

Identifying Lead-Based Paint and Lead-Based Paint Hazards

Deteriorating lead-based paint (peeling, chipping, chalking, cracking, or damaged paint) is a hazard and needs immediate attention. **Lead-based paint** may also be a hazard when found on surfaces that children can chew or that get a lot of wear and tear, such as:

- On windows and window sills
- Doors and door frames
- Stairs, railings, banisters, and porches

Lead-based paint is usually not a hazard if it is in good condition and if it is not on an impact or friction surface like a window.

Lead dust can form when lead-based paint is scraped, sanded, or heated. Lead dust also forms when painted surfaces containing lead bump or rub together. Lead paint chips and dust can get on surfaces and objects that people touch. Settled lead dust can reenter the air when the home is vacuumed or swept, or when people walk through it. EPA currently defines the following levels of lead in dust as hazardous:

- 40 micrograms per square foot ($\mu g/ft^2$) and higher for floors, including carpeted floors
- 250 $\mu g/ft^2$ and higher for interior window sills

Lead in soil can be a hazard when children play in bare soil or when people bring soil into the house on their shoes. EPA currently defines the following levels of lead in soil as hazardous:

- 400 parts per million (ppm) and higher in play areas of bare soil
- 1,200 ppm (average) and higher in bare soil in the remainder of the yard

Remember, lead from paint chips—which you can see—and lead dust—which you may not be able to see—both can be hazards.

The only way to find out if paint, dust, or soil lead hazards exist is to test for them. The next page describes how to do this.

Checking Your Home for Lead

You can get your home tested for lead in several different ways:

- A lead-based paint **inspection** tells you if your home has lead-based paint and where it is located. It won't tell you whether your home currently has lead hazards. A trained and certified testing professional, called a lead-based paint inspector, will conduct a paint inspection using methods, such as:
  - Portable x-ray fluorescence (XRF) machine
  - Lab tests of paint samples

- A **risk assessment** tells you if your home currently has any lead hazards from lead in paint, dust, or soil. It also tells you what actions to take to address any hazards. A trained and certified testing professional, called a risk assessor, will:
  - Sample paint that is deteriorated on doors, windows, floors, stairs, and walls
  - Sample dust near painted surfaces and sample bare soil in the yard
  - Get lab tests of paint, dust, and soil samples
- A combination inspection and risk assessment tells you if your home has any lead-based paint and if your home has any lead hazards, and where both are located.

Be sure to read the report provided to you after your inspection or risk assessment is completed, and ask questions about anything you do not understand.

Checking Your Home for Lead, continued

In preparing for renovation, repair, or painting work in a pre-1978 home, Lead-Safe Certified renovators (see page 12) may:

- Take paint chip samples to determine if lead-based paint is present in the area planned for renovation and send them to an EPA-recognized lead lab for analysis. In housing receiving federal assistance, the person collecting these samples must be a certified lead-based paint inspector or risk assessor
- Use EPA-recognized tests kits to determine if lead-based paint is absent (but not in housing receiving federal assistance)
- Presume that lead-based paint is present and use lead-safe work practices

There are state and federal programs in place to ensure that testing is done safely, reliably, and effectively. Contact your state or local agency for more information, visit epa.gov/lead, or call **1-800-424-LEAD (5323)** for a list of contacts in your area.[3]

[3] Hearing- or speech-challenged individuals may access this number through TTY by calling the Federal Relay Service at 1-800-877-8339.

What You Can Do Now to Protect Your Family

If you suspect that your house has lead-based paint hazards, you can take some immediate steps to reduce your family's risk:

- If you rent, notify your landlord of peeling or chipping paint.
- Keep painted surfaces clean and free of dust. Clean floors, window frames, window sills, and other surfaces weekly. Use a mop or sponge with warm water and a general all-purpose cleaner. (Remember: never mix ammonia and bleach products together because they can form a dangerous gas.)
- Carefully clean up paint chips immediately without creating dust.
- Thoroughly rinse sponges and mop heads often during cleaning of dirty or dusty areas, and again afterward.
- Wash your hands and your children's hands often, especially before they eat and before nap time and bed time.
- Keep play areas clean. Wash bottles, pacifiers, toys, and stuffed animals regularly.
- Keep children from chewing window sills or other painted surfaces, or eating soil.
- When renovating, repairing, or painting, hire only EPA- or state-approved Lead-Safe Certified renovation firms (see page 12).
- Clean or remove shoes before entering your home to avoid tracking in lead from soil.
- Make sure children eat nutritious, low-fat meals high in iron, and calcium, such as spinach and dairy products. Children with good diets absorb less lead.

Reducing Lead Hazards

Disturbing lead-based paint or removing lead improperly can increase the hazard to your family by spreading even more lead dust around the house.

- In addition to day-to-day cleaning and good nutrition, you can **temporarily** reduce lead-based paint hazards by taking actions, such as repairing damaged painted surfaces and planting grass to cover lead-contaminated soil. These actions are not permanent solutions and will need ongoing attention.
- You can minimize exposure to lead when renovating, repairing, or painting by hiring an EPA- or state-certified renovator who is trained in the use of lead-safe work practices. If you are a do-it-yourselfer, learn how to use lead–safe work practices in your home.
- To remove lead hazards permanently, you should hire a certified lead abatement contractor. Abatement (or permanent hazard elimination) methods include removing, sealing, or enclosing lead-based paint with special materials. Just painting over the hazard with regular paint is not permanent control.

Always use a certified contractor who is trained to address lead hazards safely.

- Hire a Lead-Safe Certified firm (see page 12) to perform renovation, repair, or painting (RRP) projects that disturb painted surfaces.
- To correct lead hazards permanently, hire a certified lead abatement professional. This will ensure your contractor knows how to work safely and has the proper equipment to clean up thoroughly.

Certified contractors will employ qualified workers and follow strict safety rules as set by their state or by the federal government.

Reducing Lead Hazards, continued

If your home has had lead abatement work done or if the housing is receiving federal assistance, once the work is completed, dust cleanup activities must be conducted until clearance testing indicates that lead dust levels are below the following levels:

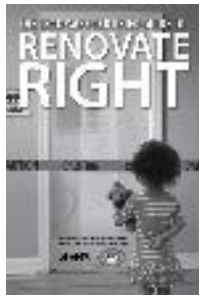
- 40 micrograms per square foot (µg/ft^2) for floors, including carpeted floors
- 250 µg/ft^2 for interior windows sills
- 400 µg/ft^2 for window troughs

For help in locating certified lead abatement professionals in your area, call your state or local agency (see pages 14 and 15), or visit epa.gov/lead, or call 1-800-424-LEAD.

Renovating, Repairing or Painting a Home with Lead-Based Paint

If you hire a contractor to conduct renovation, repair, or painting (RRP) projects in your pre-1978 home or childcare facility (such as pre-school and kindergarten), your contractor must:

- Be a Lead-Safe Certified firm approved by EPA or an EPA-authorized state program
- Use qualified trained individuals (Lead-Safe Certified renovators) who follow specific lead-safe work practices to prevent lead contamination
- Provide a copy of EPA's lead hazard information document, *The Lead-Safe Certified Guide to Renovate Right*



RRP contractors working in pre-1978 homes and childcare facilities must follow lead-safe work practices that:

- **Contain the work area.** The area must be contained so that dust and debris do not escape from the work area. Warning signs must be put up, and plastic or other impermeable material and tape must be used.
- **Avoid renovation methods that generate large amounts of lead-contaminated dust.** Some methods generate so much lead-contaminated dust that their use is prohibited. They are:
  - Open-flame burning or torching
  - Sanding, grinding, planing, needle gunning, or blasting with power tools and equipment not equipped with a shroud and HEPA vacuum attachment
  - Using a heat gun at temperatures greater than 1100°F
- **Clean up thoroughly.** The work area should be cleaned up daily. When all the work is done, the area must be cleaned up using special cleaning methods.
- **Dispose of waste properly.** Collect and seal waste in a heavy duty bag or sheeting. When transported, ensure that waste is contained to prevent release of dust and debris.

To learn more about EPA's requirements for RRP projects, visit epa.gov/getleadsafe, or read *The Lead-Safe Certified Guide to Renovate Right*.

Other Sources of Lead

Lead in Drinking Water

The most common sources of lead in drinking water are lead pipes, faucets, and fixtures.

Lead pipes are more likely to be found in older cities and homes built before 1986.

You can't smell or taste lead in drinking water.

To find out for certain if you have lead in drinking water, have your water tested.

Remember older homes with a private well can also have plumbing materials that contain lead.

Important Steps You Can Take to Reduce Lead in Drinking Water

- Use only cold water for drinking, cooking and making baby formula. Remember, boiling water does not remove lead from water.
- Before drinking, flush your home's pipes by running the tap, taking a shower, doing laundry, or doing a load of dishes.
- Regularly clean your faucet's screen (also known as an aerator).
- If you use a filter certified to remove lead, don't forget to read the directions to learn when to change the cartridge. Using a filter after it has expired can make it less effective at removing lead.

Contact your water company to determine if the pipe that connects your home to the water main (called a service line) is made from lead. Your area's water company can also provide information about the lead levels in your system's drinking water.

For more information about lead in drinking water, please contact EPA's Safe Drinking Water Hotline at 1-800-426-4791. If you have other questions about lead poisoning prevention, call 1-800 424-LEAD.*

Call your local health department or water company to find out about testing your water, or visit epa.gov/safewater for EPA's lead in drinking water information. Some states or utilities offer programs to pay for water testing for residents. Contact your state or local water company to learn more.

* Hearing- or speech-challenged individuals may access this number through TTY by calling the Federal Relay Service at 1-800-877-8339.

Other Sources of Lead, continued

- **Lead smelters** or other industries that release lead into the air.
- **Your job.** If you work with lead, you could bring it home on your body or clothes. Shower and change clothes before coming home. Launder your work clothes separately from the rest of your family's clothes.
- **Hobbies** that use lead, such as making pottery or stained glass, or refinishing furniture. Call your local health department for information about hobbies that may use lead.
- Old **toys** and **furniture** may have been painted with lead-containing paint. Older toys and other children's products may have parts that contain lead.[4]
- Food and liquids cooked or stored in **lead crystal** or **lead-glazed pottery or porcelain** may contain lead.
- Folk remedies, such as **"greta"** and **"azarcon,"** used to treat an upset stomach.

[4] In 1978, the federal government banned toys, other children's products, and furniture with lead-containing paint. In 2008, the federal government banned lead in most children's products. The federal government currently bans lead in excess of 100 ppm by weight in most children's products.

For More Information

The National Lead Information Center
Learn how to protect children from lead poisoning and get other information about lead hazards on the Web at epa.gov/lead and hud.gov/lead, or call **1-800-424-LEAD (5323).**

EPA's Safe Drinking Water Hotline
For information about lead in drinking water, call **1-800-426-4791**, or visit epa.gov/safewater for information about lead in drinking water.

Consumer Product Safety Commission (CPSC) Hotline
For information on lead in toys and other consumer products, or to report an unsafe consumer product or a product-related injury, call **1-800-638-2772,** or visit CPSC's website at cpsc.gov or saferproducts.gov.

State and Local Health and Environmental Agencies
Some states, tribes, and cities have their own rules related to lead-based paint. Check with your local agency to see which laws apply to you. Most agencies can also provide information on finding a lead abatement firm in your area, and on possible sources of financial aid for reducing lead hazards. Receive up-to-date address and phone information for your state or local contacts on the Web at epa.gov/lead, or contact the National Lead Information Center at **1-800-424-LEAD.**

Hearing- or speech-challenged individuals may access any of the phone numbers in this brochure through TTY by calling the toll-free Federal Relay Service at **1-800-877-8339**.

U. S. Environmental Protection Agency (EPA) Regional Offices

The mission of EPA is to protect human health and the environment. Your Regional EPA Office can provide further information regarding regulations and lead protection programs.

Region 1 (Connecticut, Massachusetts, Maine, New Hampshire, Rhode Island, Vermont)

Regional Lead Contact
U.S. EPA Region 1
5 Post Office Square, Suite 100, OES 05-4
Boston, MA 02109-3912
(888) 372-7341

Region 2 (New Jersey, New York, Puerto Rico, Virgin Islands)

Regional Lead Contact
U.S. EPA Region 2
2890 Woodbridge Avenue
Building 205, Mail Stop 225
Edison, NJ 08837-3679
(732) 321-6671

Region 3 (Delaware, Maryland, Pennsylvania, Virginia, DC, West Virginia)

Regional Lead Contact
U.S. EPA Region 3
1650 Arch Street
Philadelphia, PA 19103
(215) 814-2088

Region 4 (Alabama, Florida, Georgia, Kentucky, Mississippi, North Carolina, South Carolina, Tennessee)

Regional Lead Contact
U.S. EPA Region 4
AFC Tower, 12th Floor, Air, Pesticides & Toxics
61 Forsyth Street, SW
Atlanta, GA 30303
(404) 562-8998

Region 5 (Illinois, Indiana, Michigan, Minnesota, Ohio, Wisconsin)

Regional Lead Contact
U.S. EPA Region 5 (DT-8J)
77 West Jackson Boulevard
Chicago, IL 60604-3666
(312) 886-7836

Region 6 (Arkansas, Louisiana, New Mexico, Oklahoma, Texas, and 66 Tribes)

Regional Lead Contact
U.S. EPA Region 6
1445 Ross Avenue, 12th Floor
Dallas, TX 75202-2733
(214) 665-2704

Region 7 (Iowa, Kansas, Missouri, Nebraska)

Regional Lead Contact
U.S. EPA Region 7
11201 Renner Blvd.
WWPD/TOPE
Lenexa, KS 66219
(800) 223-0425

Region 8 (Colorado, Montana, North Dakota, South Dakota, Utah, Wyoming)

Regional Lead Contact
U.S. EPA Region 8
1595 Wynkoop St.
Denver, CO 80202
(303) 312-6966

Region 9 (Arizona, California, Hawaii, Nevada)

Regional Lead Contact
U.S. EPA Region 9 (CMD-4-2)
75 Hawthorne Street
San Francisco, CA 94105
(415) 947-4280

Region 10 (Alaska, Idaho, Oregon, Washington)

Regional Lead Contact
U.S. EPA Region 10
Solid Waste & Toxics Unit (WCM-128)
1200 Sixth Avenue, Suite 900
Seattle, WA 98101
(206) 553-1200

Consumer Product Safety Commission (CPSC)

The CPSC protects the public against unreasonable risk of injury from consumer products through education, safety standards activities, and enforcement. Contact CPSC for further information regarding consumer product safety and regulations.

CPSC
4330 East West Highway
Bethesda, MD 20814-4421
1-800-638-2772
cpsc.gov or saferproducts.gov

U. S. Department of Housing and Urban Development (HUD)

HUD's mission is to create strong, sustainable, inclusive communities and quality affordable homes for all. Contact HUD's Office of Healthy Homes and Lead Hazard Control for further information regarding the Lead Safe Housing Rule, which protects families in pre-1978 assisted housing, and for the lead hazard control and research grant programs.

HUD
451 Seventh Street, SW, Room 8236
Washington, DC 20410-3000
(202) 402-7698
hud.gov/offices/lead/

U. S. EPA Washington DC 20460
U. S. CPSC Bethesda MD 20814
U. S. HUD Washington DC 20410

EPA-747-K-12-001
June 2017

IMPORTANT!

Lead From Paint, Dust, and Soil in and Around Your Home Can Be Dangerous if Not Managed Properly

- Children under 6 years old are most at risk for lead poisoning in your home.
- Lead exposure can harm young children and babies even before they are born.
- Homes, schools, and child care facilities built before 1978 are likely to contain lead-based paint.
- Even children who seem healthy may have dangerous levels of lead in their bodies.
- Disturbing surfaces with lead-based paint or removing lead-based paint improperly can increase the danger to your family.
- People can get lead into their bodies by breathing or swallowing lead dust, or by eating soil or paint chips containing lead.
- People have many options for reducing lead hazards. Generally, lead-based paint that is in good condition is not a hazard (see page 10).

THE LEAD-SAFE CERTIFIED GUIDE TO

RENOVATE RIGHT

Important lead hazard information for families, child care providers and schools.

U.S. Department of Housing and Urban Development

EPA

1-800-424-LEAD (5323)

epa.gov/getleadsafe

EPA-740-K-10-001

Revised September 2011

IT'S THE LAW!

Federal law requires contractors that disturb painted surfaces in homes, child care facilities and schools built before 1978 to be certified and follow specific work practices to prevent lead contamination. Always ask to see your contractor's certification.

Federal law requires that individuals receive certain information before renovating more than six square feet of painted surfaces in a room for interior projects or more than twenty square feet of painted surfaces for exterior projects or window replacement or demolition in housing, child care facilities and schools built before 1978.

- Homeowners and tenants: renovators must give you this pamphlet before starting work.
- Child care facilities, including preschools and kindergarten classrooms, and the families of children under six years of age that attend those facilities: renovators must provide a copy of this pamphlet to child care facilities and general renovation information to families whose children attend those facilities.

WHO SHOULD READ THIS PAMPHLET?

This pamphlet is for you if you:

- Reside in a home built before 1978.
- Own or operate a child care facility, including preschools and kindergarten classrooms, built before 1978, or
- Have a child under six years of age who attends a child care facility built before 1978.

You will learn:

- Basic facts about lead and your health.
- How to choose a contractor, if you are a property owner.
- What tenants, and parents/guardians of a child in a child care facility or school should consider.
- How to prepare for the renovation or repair job.
- What to look for during the job and after the job is done.
- Where to get more information about lead.

This pamphlet is not for:

- **Abatement projects.** Abatement is a set of activities aimed specifically at eliminating lead or lead hazards. EPA has regulations for certification and training of abatement professionals. If your goal is to eliminate lead or lead hazards, contact the National Lead Information Center at **1-800-424-LEAD (5323)** for more information.
- **"Do-it-yourself"** projects. If you plan to do renovation work yourself, this document is a good start, but you will need more information to complete the work safely. Call the National Lead Information Center at **1-800-424-LEAD (5323)** and ask for more information on how to work safely in a home with lead-based paint.
- **Contractor education.** Contractors who want information about working safely with lead should contact the National Lead Information Center at **1-800-424-LEAD (5323)** for information about courses and resources on lead-safe work practices.

RENOVATING, REPAIRING, OR PAINTING?

- Is your home, your building, or the child care facility or school your children attend being renovated, repaired, or painted?
- Was your home, your building, or the child care facility or school where your children under six years of age attend built before 1978?

If the answer to these questions is YES, there are a few important things you need to know about lead-based paint.

This pamphlet provides basic facts about lead and information about lead safety when work is being done in your home, your building or the child care facility or school your children attend.

The Facts About Lead

- Lead can affect children's brains and developing nervous systems, causing reduced IQ, learning disabilities, and behavioral problems. Lead is also harmful to adults.
- Lead in dust is the most common way people are exposed to lead. People can also get lead in their bodies from lead in soil or paint chips. Lead dust is often invisible.
- Lead-based paint was used in more than 38 million homes until it was banned for residential use in 1978.
- Projects that disturb painted surfaces can create dust and endanger you and your family. Don't let this happen to you. Follow the practices described in this pamphlet to protect you and your family.

LEAD AND YOUR HEALTH

Lead is especially dangerous to children under six years of age.

Lead can affect children's brains and developing nervous systems, causing:

- Reduced IQ and learning disabilities.
- Behavior problems.

Even children who appear healthy can have dangerous levels of lead in their bodies.

Lead is also harmful to adults. In adults, low levels of lead can pose many dangers, including:

- High blood pressure and hypertension.
- Pregnant women exposed to lead can transfer lead to their fetuses. Lead gets into the body when it is swallowed or inhaled.
- People, especially children, can swallow lead dust as they eat, play, and do other normal hand-to-mouth activities.
- People may also breathe in lead dust or fumes if they disturb lead-based paint. People who sand, scrape, burn, brush, blast or otherwise disturb lead-based paint risk unsafe exposure to lead.

What should I do if I am concerned about my family's exposure to lead?

- A blood test is the only way to find out if you or a family member already has lead poisoning. Call your doctor or local health department to arrange for a blood test.
- Call your local health department for advice on reducing and eliminating exposures to lead inside and outside your home, child care facility or school.
- Always use lead-safe work practices when renovation or repair will disturb painted surfaces.

For more information about the health effects of exposure to lead, visit the EPA lead website at epa.gov/lead/pubs/leadinfo or call **1-800-424-LEAD (5323)**.

There are other things you can do to protect your family every day.

- Regularly clean floors, window sills, and other surfaces.
- Wash children's hands, bottles, pacifiers, and toys often.
- Make sure children eat a healthy, nutritious diet consistent with the USDA's dietary guidelines, that helps protect children from the effects of lead.
- Wipe off shoes before entering the house.

WHERE DOES THE LEAD COME FROM?

Dust is the main problem.

The most common way to get lead in the body is from dust. Lead dust comes from deteriorating lead-based paint and lead-contaminated soil that gets tracked into your home. This dust may accumulate to unsafe levels. Then, normal hand to-mouth activities, like playing and eating (especially in young children), move that dust from surfaces like floors and window sills into the body.

Home renovation creates dust.

Common renovation activities like sanding, cutting, and demolition can create hazardous lead dust and chips.

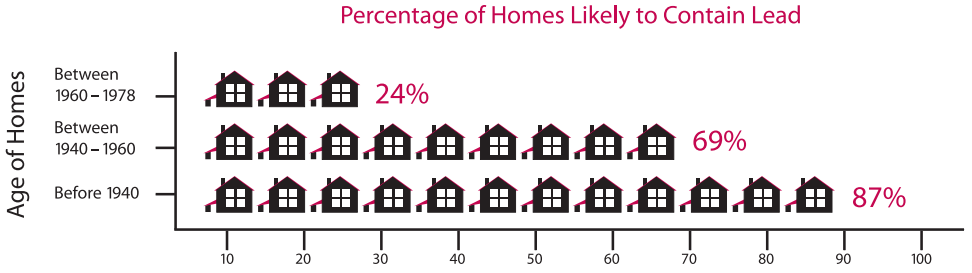
Proper work practices protect you from the dust.

The key to protecting yourself and your family during a renovation, repair or painting job is to use lead-safe work practices such as containing dust inside the work area, using dust-minimizing work methods, and conducting a careful cleanup, as described in this pamphlet.

Other sources of lead.

Remember, lead can also come from outside soil, your water, or household items (such as lead-glazed pottery and lead crystal). Contact the National Lead Information Center at **1-800-424-LEAD (5323)** for more information on these sources.

CHECKING YOUR HOME FOR LEAD-BASED PAINT



Older homes, child care facilities, and schools are more likely to contain lead-based paint.

Homes may be single-family homes or apartments. They may be private, government-assisted, or public housing. Schools are preschools and kindergarten classrooms. They may be urban, suburban, or rural.

You have the following options:

You may decide to assume your home, child care facility, or school contains lead. Especially in older homes and buildings, you may simply want to assume lead-based paint is present and follow the lead-safe work practices described in this brochure during the renovation, repair, or painting job.

You can hire a certified professional to check for lead-based paint. These professionals are certified risk assessors or inspectors, and can determine if your home has lead or lead hazards.

- A certified inspector or risk assessor can conduct an inspection telling you whether your home, or a portion of your home, has lead-based paint and where it is located. This will tell you the areas in your home where lead-safe work practices are needed.
- A certified risk assessor can conduct a risk assessment telling you if your home currently has any lead hazards from lead in paint, dust, or soil. The risk assessor can also tell you what actions to take to address any hazards.
- For help finding a certified risk assessor or inspector, call the National Lead Information Center at **1-800-424-LEAD (5323)**.

You may also have a certified renovator test the surfaces or components being disturbed for lead by using a lead test kit or by taking paint chip samples and sending them to an EPA-recognized testing laboratory. Test kits must be EPA-recognized and are available at hardware stores. They include detailed instructions for their use.

FOR PROPERTY OWNERS

You have the ultimate responsibility for the safety of your family, tenants, or children in your care.

This means properly preparing for the renovation and keeping persons out of the work area (see p. 8). It also means ensuring the contractor uses lead-safe work practices.

Federal law requires that contractors performing renovation, repair and painting projects that disturb painted surfaces in homes, child care facilities, and schools built before 1978 be certified and follow specific work practices to prevent lead contamination.

Make sure your contractor is certified, and can explain clearly the details of the job and how the contractor will minimize lead hazards during the work.

- You can verify that a contractor is certified by checking EPA's website at epa.gov/getleadsafe or by calling the National Lead Information Center at **1-800-424-LEAD (5323)**. You can also ask to see a copy of the contractor's firm certification.
- Ask if the contractor is trained to perform lead-safe work practices and to see a copy of their training certificate.
- Ask them what lead-safe methods they will use to set up and perform the job in your home, child care facility or school.
- Ask for references from at least three recent jobs involving homes built before 1978, and speak to each personally.

Always make sure the contract is clear about how the work will be set up, performed, and cleaned.

- Share the results of any previous lead tests with the contractor.
- You should specify in the contract that they follow the work practices described on pages 9 and 10 of this brochure.
- The contract should specify which parts of your home are part of the work area and specify which lead-safe work practices will be used in those areas. Remember, your contractor should confine dust and debris to the work area and should minimize spreading that dust to other areas of the home.
- The contract should also specify that the contractor will clean the work area, verify that it was cleaned adequately, and re-clean it if necessary.

If you think a worker is not doing what he is supposed to do or is doing something that is unsafe, you should:

- Direct the contractor to comply with regulatory and contract requirements.
- Call your local health or building department, or
- Call EPA's hotline **1-800-424-LEAD (5323)**.

If your property receives housing assistance from HUD (or a state or local agency that uses HUD funds), you must follow the requirements of HUD's Lead-Safe Housing Rule and the ones described in this pamphlet.

FOR TENANTS AND FAMILIES OF CHILDREN UNDER SIX YEARS OF AGE IN CHILD CARE FACILITIES AND SCHOOLS

You play an important role ensuring the ultimate safety of your family.

This means properly preparing for the renovation and staying out of the work area (see p. 8).

Federal law requires that contractors performing renovation, repair and painting projects that disturb painted surfaces in homes built before 1978 and in child care facilities and schools built before 1978, that a child under six years of age visits regularly, to be certified and follow specific work practices to prevent lead contamination.

The law requires anyone hired to renovate, repair, or do painting preparation work on a property built before 1978 to follow the steps described on pages 9 and 10 unless the area where the work will be done contains no lead-based paint.

If you think a worker is not doing what he is supposed to do or is doing something that is unsafe, you should:

- Contact your landlord.
- Call your local health or building department, or
- Call EPA's hotline **1-800-424-LEAD (5323)**.

If you are concerned about lead hazards left behind after the job is over, you can check the work yourself (see page 10).

PREPARING FOR A RENOVATION

The work areas should not be accessible to occupants while the work occurs.

The rooms or areas where work is being done may need to be blocked off or sealed with plastic sheeting to contain any dust that is generated. Therefore, the contained area may not be available to you until the work in that room or area is complete, cleaned thoroughly, and the containment has been removed. Because you may not have access to some areas during the renovation, you should plan accordingly.

You may need:

- Alternative bedroom, bathroom, and kitchen arrangements if work is occurring in those areas of your home.
- A safe place for pets because they too can be poisoned by lead and can track lead dust into other areas of the home.
- A separate pathway for the contractor from the work area to the outside in order to bring materials in and out of the home. Ideally, it should not be through the same entrance that your family uses.
- A place to store your furniture. All furniture and belongings may have to be moved from the work area while the work is being done. Items that can't be moved, such as cabinets, should be wrapped in plastic.
- To turn off forced-air heating and air conditioning systems while the work is being done. This prevents dust from spreading through vents from the work area to the rest of your home. Consider how this may affect your living arrangements.

You may even want to move out of your home temporarily while all or part of the work is being done.

Child care facilities and schools may want to consider alternative accommodations for children and access to necessary facilities.

DURING THE WORK

Federal law requires contractors that are hired to perform renovation, repair and painting projects in homes, child care facilities, and schools built before 1978 that disturb painted surfaces to be certified and follow specific work practices to prevent lead contamination.

The work practices the contractor must follow include these three simple procedures, described below:

1. **Contain the work area.** The area must be contained so that dust and debris do not escape from that area. Warning signs must be put up and plastic or other impermeable material and tape must be used as appropriate to:
   - Cover the floors and any furniture that cannot be moved.
   - Seal off doors and heating and cooling system vents.
   - For exterior renovations, cover the ground and, in some instances, erect vertical containment or equivalent extra precautions in containing the work area.

These work practices will help prevent dust or debris from getting outside the work area.

2. **Avoid renovation methods that generate large amounts of lead-contaminated dust.** Some methods generate so much lead-contaminated dust that their use is prohibited. They are:
   - Open flame burning or torching.
   - Sanding, grinding, planing, needle gunning, or blasting with power tools and equipment not equipped with a shroud and HEPA vacuum attachment.
   - Using a heat gun at temperatures greater than 1100°F.

There is no way to eliminate dust, but some renovation methods make less dust than others. Contractors may choose to use various methods to minimize dust generation, including using water to mist areas before sanding or scraping; scoring paint before separating components; and prying and pulling apart components instead of breaking them.

3. **Clean up thoroughly.** The work area should be cleaned up daily to keep it as clean as possible. When all the work is done, the area must be cleaned up using special cleaning methods before taking down any plastic that isolates the work area from the rest of the home. The special cleaning methods should include:
   - Using a HEPA vacuum to clean up dust and debris on all surfaces, followed by
   - Wet wiping and wet mopping with plenty of rinse water.

When the final cleaning is done, look around. There should be no dust, paint chips, or debris in the work area. If you see any dust, paint chips, or debris, the area must be re-cleaned.

FOR PROPERTY OWNERS: AFTER THE WORK IS DONE

When all the work is finished, you will want to know if your home, child care facility, or school where children under six attend has been cleaned up properly.

EPA Requires Cleaning Verification.

In addition to using allowable work practices and working in a lead-safe manner, EPA's RRP rule requires contractors to follow a specific cleaning protocol. The protocol requires the contractor to use disposable cleaning cloths to wipe the floor and other surfaces of the work area and compare these cloths to an EPA-provided cleaning verification card to determine if the work area was adequately cleaned. EPA research has shown that following the use of lead-safe work practices with the cleaning verification protocol will effectively reduce lead-dust hazards.

Lead-Dust Testing.

EPA believes that if you use a certified and trained renovation contractor who follows the LRRP rule by using lead-safe work practices and the cleaning protocol after the job is finished, lead-dust hazards will be effectively reduced. If, however, you are interested in having lead-dust testing done at the completion of your job, outlined below is some helpful information.

What is a lead-dust test?

- Lead-dust tests are wipe samples sent to a laboratory for analysis. You will get a report specifying the levels of lead found after your specific job.

How and when should I ask my contractor about lead-dust testing?

- Contractors are not required by EPA to conduct lead-dust testing. However, if you want testing, EPA recommends testing be conducted by a lead professional. To locate a lead professional who will perform an evaluation near you, visit EPA's website at epa.gov/lead/pubs/locate or contact the National Lead Information Center at **1-800-424-LEAD (5323).**

- If you decide that you want lead-dust testing, it is a good idea to specify in your contract, before the start of the job, that a lead-dust test is to be done for your job and who will do the testing, as well as whether re-cleaning will be required based on the results of the test.

- You may do the testing yourself. If you choose to do the testing, some EPA-recognized lead laboratories will send you a kit that allows you to collect samples and send them back to the laboratory for analysis. Contact the National Lead Information Center for lists of EPA-recognized testing laboratories.

FOR ADDITIONAL INFORMATION

You may need additional information on how to protect yourself and your children while a job is going on in your home, your building, or child care facility.

The National Lead Information Center at **1-800-424-LEAD (5323)** or epa.gov/lead/nlic can tell you how to contact your state, local, and/or tribal programs or get general information about lead poisoning prevention.

- State and tribal lead poisoning prevention or environmental protection programs can provide information about lead regulations and potential sources of financial aid for reducing lead hazards. If your state or local government has requirements more stringent than those described in this pamphlet, you must follow those requirements.

- Local building code officials can tell you the regulations that apply to the renovation work that you are planning.

- State, county, and local health departments can provide information about local programs, including assistance for lead-poisoned children and advice on ways to get your home checked for lead.

The National Lead Information Center can also provide a variety of resource materials, including the following guides to lead-safe work practices. Many of these materials are also available at epa.gov/lead/pubs/brochure

- Steps to Lead Safe Renovation, Repair and Painting.
- Protect Your Family from Lead in Your Home
- Lead in Your Home: A Parent's Reference Guide

For the hearing impaired, call the Federal Information Relay Service at 1-800-877-8339 to access any of the phone numbers in this brochure.

EPA CONTACTS

EPA Regional Offices

EPA addresses residential lead hazards through several different regulations. EPA requires training and certification for conducting abatement and renovations, education about hazards associated with renovations, disclosure about known lead paint and lead hazards in housing, and sets lead-paint hazard standards.

Your Regional EPA Office can provide further information regarding lead safety and lead protection programs at epa.gov/lead.

Region 1
(Connecticut, Massachusetts, Maine, New Hampshire, Rhode Island, Vermont)
Regional Lead Contact
U.S. EPA Region 1
Suite 1100
One Congress Street
Boston, MA 02114-2023
(888) 372-7341

Region 2
(New Jersey, New York, Puerto Rico, Virgin Islands)
Regional Lead Contact
U.S. EPA Region 2
2890 Woodbridge Avenue
Building 205, Mail Stop 225
Edison, NJ 08837-3679
(732) 321-6671

Region 3
(Delaware, Maryland, Pennsylvania, Virginia, Washington, DC, West Virginia)
Regional Lead Contact
U.S. EPA Region 3
1650 Arch Street
Philadelphia, PA
19103-2029
(215) 814-5000

Region 4
(Alabama, Florida, Georgia, Kentucky, Mississippi, North Carolina, South Carolina, Tennessee)
Regional Lead Contact
U.S. EPA Region 4
61 Forsyth Street, SW
Atlanta, GA 30303-8960
(404) 562-9900

Region 5
(Illinois, Indiana, Michigan, Minnesota, Ohio, Wisconsin)
Regional Lead Contact
U.S. EPA Region 5
77 West Jackson Boulevard
Chicago, IL 60604-3507
(312) 886-6003

Region 6
(Arkansas, Louisiana, New Mexico, Oklahoma, Texas)
Regional Lead Contact
U.S. EPA Region 6
1445 Ross Avenue,
12th Floor
Dallas, TX 75202-2733
(214) 665-7577

Region 7
(Iowa, Kansas, Missouri, Nebraska)
Regional Lead Contact
U.S. EPA Region 7
901 N. 5th Street
Kansas City, KS 66101
(913) 551-7003

Region 8
(Colorado, Montana, North Dakota, South Dakota, Utah, Wyoming)
Regional Lead Contact
U.S. EPA Region 8
1595 Wynkoop Street
Denver, CO 80202
(303) 312-6312

Region 9
(Arizona, California, Hawaii, Nevada)
Regional Lead Contact
U.S. Region 9
75 Hawthorne Street
San Francisco, CA 94105
(415) 947-8021

Region 10
(Alaska, Idaho, Oregon, Washington)
Regional Lead Contact
U.S. EPA Region 10
1200 Sixth Avenue
Seattle, WA 98101-1128
(206) 553-1200

OTHER FEDERAL AGENCIES

CPSC

The Consumer Product Safety Commission (CPSC) protects the public from the unreasonable risk of injury or death from 15,000 types of consumer products under the agency's jurisdiction. CPSC warns the public and private sectors to reduce exposure to lead and increase consumer awareness. Contact CPSC for further information regarding regulations and consumer product safety.

CPSC
4330 East West Highway
Bethesda, MD 20814
Hotline 1-(800) 638-2772
cpsc.gov

CDC Childhood Lead Poisoning Prevention Branch

The Centers for Disease Control and Prevention (CDC) assists state and local childhood lead poisoning prevention programs to provide a scientific basis for policy decisions, and to ensure that health issues are addressed in decisions about housing and the environment. Contact CDC Childhood Lead Poisoning Prevention Program for additional materials and links on the topic of lead.

CDC Childhood Lead Poisoning Prevention Branch
4770 Buford Highway, MS F-40
Atlanta, GA 30341
(770) 488-3300
cdc.gov/nceh/lead

HUD Office of Healthy Homes and Lead Hazard Control

The Department of Housing and Urban Development (HUD) provides funds to state and local governments to develop cost-effective ways to reduce lead-based paint hazards in America's privately-owned low-income housing. In addition, the office enforces the rule on disclosure of known lead paint and lead hazards in housing, and HUD's lead safety regulations in HUD-assisted housing, provides public outreach and technical assistance, and conducts technical studies to help protect children and their families from health and safety hazards in the home. Contact the HUD Office of Healthy Homes and Lead Hazard Control for information on lead regulations, outreach efforts, and lead hazard control research and outreach grant programs.

U.S. Department of Housing and Urban Development
Office of Healthy Homes and Lead Hazard Control
451 Seventh Street, SW, Room 8236
Washington, DC 20410-3000
HUD's Lead Regulations Hotline
(202) 402-7698
hud.gov/offices/lead/

SAMPLE PRE-RENOVATION FORM

This sample form may be used by renovation firms to document compliance with the Federal pre-renovation education and renovation, repair, and painting regulations.

Occupant Confirmation

Pamphlet Receipt

❑ I have received a copy of the lead hazard information pamphlet informing me of the potential risk of the lead hazard exposure from renovation activity to be performed in my dwelling unit. I received this pamphlet before the work began.

Printed Name of Owner-occupant

Signature of Owner-occupant | Signature Date

Renovator's Self Certification Option (for tenant-occupied dwellings only)

Instructions to Renovator: If the lead hazard information pamphlet was delivered but a tenant signature was not obtainable, you may check the appropriate box below.

❑ **Declined** – I certify that I have made a good faith effort to deliver the lead hazard information pamphlet to the rental dwelling unit listed below at the date and time indicated and that the occupant declined to sign the confirmation of receipt. I further certify that I have left a copy of the pamphlet at the unit with the occupant.

❑ **Unavailable for signature** – I certify that I have made a good faith effort to deliver the lead hazard information pamphlet to the rental dwelling unit listed below and that the occupant was unavailable to sign the confirmation of receipt. I further certify that I have left a copy of the pamphlet at the unit by sliding it under the door or by (fill in how pamphlet was left).

Printed Name of Person Certifying Delivery | Attempted Delivery Date

Signature of Person Certifying Lead Pamphlet Delivery

Unit Address

Note Regarding Mailing Option — As an alternative to delivery in person, you may mail the lead hazard information pamphlet to the owner and/or tenant. Pamphlet must be mailed at least seven days before renovation. Mailing must be documented by a certificate of mailing from the post office.