Vector Environmental Consulting Inc.
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Lead Inspection Report

Site Information:

2730 Park Avenue
La Verne, CA 91750

Owner Information:

Hillcrest Homes
2705 Mountain View Drive
La Verne, CA 917507

Date: October 27th, 2023

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Subject: Lead Inspection Report

Vector Environmental Consulting conducted a pre-demolition lead inspection of the major paint systems associated with the demolition of the structure noted above. All samples were collected utilizing XRF data collection. XRF data, sampling procedures and recommendations can be found on subsequent pages of this report.

Regulatory Information

The HUD/EPA standard for lead-based paint of equal to or greater than 1.0 mg/cm2 or 0.5% by weight, as defined by Title X of the Housing and Community Development Act of 1992.

For purposes of the HUD/EPA Lead-Based Paint Disclosure Rule, 1.0 milligrams per square centimeter (mg/cm^2) or 0.5% by weight are the standards that must be used. If a State or local government has an EPA-authorized plan for certifying lead-based paint inspectors and has lower lead standards, those lower lead standards would apply to inspections (but not to the Lead Disclosure Rule; paint with lead below the federal threshold is not considered lead-based paint for purposes of that Rule).

Although, there is no official standard for lead in school buildings, Los Angeles County and Los Angeles Unified School District have set a standard of 0.7 mg/cm^2. For lead containing materials within this region this standard has determined this to be the action level for abatement activities.

Definitions

Lead-based paint inspection – Title X of the Housing and Community Development Act of 1992, defines lead-based paint inspection as the following:

A surface-by-surface investigation to determine the presence of lead-based paint as provided in section 302(c) of the Lead-Based Paint Poisoning Prevention Act and the provision of a report explaining the results of the investigation. (15 U.S.C. 2681 (7), for use by EPA and its stakeholders; and 42 U.S.C. 4851(12), for use by HUD and its stakeholders.

Lead abatement – The United States Environmental Protection Agency (EPA) defines lead abatement as the following:

Lead abatement projects are designed to permanently eliminate existing lead-based paint hazards. They may be ordered by a state or local government in response to a lead-poisoned child or other reason or may be undertaken voluntarily at any time. Lead-based activities are regulated differently than renovation, repair and painting jobs (RRP), even though, in some cases, the activities are similar. Lead-based paint removal is only considered abatement if the removal is instigated for the purposes of removing lead-based paint, not for renovation purposes.

Renovation, Repair and Painting (RRP) – The United States Environmental Protection Agency (EPA) defines the RRP rule as the following:

RRP projects are typically performed at the option of the property owner for aesthetic or other reasons, or as an interim control to minimize lead hazards. It is NOT designed to permanently eliminate lead-based paint hazards. Since RRP projects can disturb lead-based paint in homes and buildings build before 1978, thus creating new lead hazards, individual renovators must be trained and certified lead-safe RRP practices, and firms must be certified.

Lead Abatement vs RRP Projects

	Lead Abatement Activities	**Similar or Different**	**RRP Projects**
Purpose	Permanently eliminate existing lead-based paint hazards	Different	Conduct renovations, repairs or painting to reduce lead-based paint hazards
Initiated by	State or local government or Voluntary request by property Owner	Different	Voluntary request by property owner
Certifications	Individuals must be trained and certified in lead abatement activities – Firms must be certified to conduct lead abatement activities	Similar	Individuals must be trained and certified in RRP activities – Firms must be certified to conduct RRP activities
Occupation Protection	Firms are required to make sure occupants are out of the home, childcare facility or preschool	Different	Firms are not required to make sure occupants are out of the home, childcare facility or preschool – Firms must distribute EPA's The Lead Safe Certified Guide to Renovate Right before starting renovation work.

OSHA Compliance

OSHA (Occupational Safety and Health Administration) through the regulation 1532.1 further delineates requirements for lead activities. 1532.1 defines "trigger tasks" (e.g., manual demolition, etc.) that disturb lead paint and the contractor responsibilities to its employees. The regulation specifically addresses PEL's (permissible exposure limits) to staff disturbing lead paint. This regulation is initiated when "trigger task" work is implemented on paint systems with .06% or 600 ppm (parts per million). It should be noted that this level (.06%) is virtually any amount of lead paint. As of January 2002, OSHA now requires all contractors to notify the department when disturbing lead paint above 1.0mg/cm2. This level is the same threshold for abatement by HUD.

OSHA requires that the employer is required to protect their employees to the level stipulated in the Standard, or to do an exposure assessment. An exposure assessment is the air monitoring of an employee during lead work to determine his exposure and ultimately to determine the level of protection required. This assessment is applicable to paint systems above .06% or 600 ppm.

Sampling Methodology

Inspection by X-Ray Fluorescents

Portable XRF lead-based paint analyzers are the most common primary analytical method for inspections in housing because of the demonstrated ability to determine if lead-based paint is present on many surfaces and to measure the paint without destructive sampling or paint removal, as well as the high speed and low cost per sample. Portable XRF instruments expose a building component to electromagnetic radiation in the form of X-rays or gamma radiation. In response to radiation, each element, including lead, emits energy at a fixed and characteristic level. Emission of characteristic x-rays is called "X-Ray Fluorescence," or XRF. The energy released is measured by the instrument's fluorescence detector and displayed. The inspector must then compare this displayed value (reading) with the threshold or inconclusive range specified in the XRF Performance Characteristic Sheet (PCS) for the specific XRF instrument being used, and the specific substrate beneath the painted surface.

- If the reading is less than the threshold, then the reading is considered negative for lead-based paint.

- If the reading is greater than or equal to the threshold, then the reading is considered positive. For instrument – substrate combinations that have an inconclusive range:

- If the reading is less than the lower boundary of the inconclusive range, then the reading is considered negative.

- If the reading is within the inconclusive range, including its boundary values, then the reading is considered inconclusive.

- If the reading is greater than the upper boundary of the inconclusive range, then the reading is considered positive

Inspection by Paint-Chip Analysis

Laboratory analysis of paint-chip samples is recommended for inaccessible areas or building components with irregular (non-flat) surfaces that cannot be tested using XRF instrumentation. Laboratory analysis is also recommended to confirm inconclusive XRF results, as specified on the applicable XRF Performance Characteristic Sheet, or at the inspector's professional judgment. Only laboratories recognized under the EPA NLLAP may be used for analyzing samples of paint in target housing or pre-1978 child occupied facilities. Laboratory analysis is more accurate and precise than XRF, but only if great care is used to collect and analyze the paint-chip sample. Laboratory results of paint chip samples should be reported as mg/cm^2. The dimensions of the area from which a paint-chip sample is removed must be measured as accurately as possible (to the nearest millimeter or 1/16th of an inch) and the sample must include every layer of paint with minimal substrate included.

Although laboratory results can also be reported as a percentage of lead by weight of the paint sample, precents should only be used when it is not feasible to use mg/cm^2. These two units of measure are not interchangeable. Laboratory results should be reported as mg/cm^2 if the surface area can be accurately measured and if all paint within that area is collected.

Determining Sample Locations

A testing combination is a unique combination of room equivalent, building component type, and substrate. Visible color may not be an accurate predictor of painting history and is not included in the definition of a testing combination. The list is not intended to be exhaustive. Unlisted components that are coated with paint, varnish, shellac, wallpaper, stain, or other coating should also be considered as a separate testing combination.

Certain building components that are adjacent to each other and not likely to have different painting histories can be grouped together into a single testing combination, as follows:

- Window casings, stops, jambs and aprons are typically a single testing combination
- Interior window mullions and window sashes are a single testing combination
- Exterior window mullions and window sashes are a single testing combination
- Door jambs, stops, transoms, casings and other door frame parts are a single testing combination
- Door stiles, rails, panels, mullions and other door parts are a single testing combination
- Baseboards and associated trim (such as quarter-round or other caps) are a single testing combination (do not group chair rails, crown molding or walls with baseboards)
- Painted electrical sockets, switches or plates can be grouped with walls

Each of these building parts should be tested separately if there is some specific reason to believe that they have a different painting history. In most cases, separate testing will not be necessary

Sample Results

The lead-based paint inspection conducted at 2730 Park Avenue included 18 XRF readings and 0 Paint Chip Samples, covering representative building components, substrates and paint colors on or in the building.

The following table lists the higher lead containing components that could likely require demolition and/or removal. These items would certainly require "abatement procedures" be implemented.

Subsequent tables illustrate all of the paint systems at the school site. Regulations may apply to other components with lower levels of lead. The contractor is required to review and verify the scope of work for the project and determine the impact of activities on lead painted surfaces (at any level).

The following table lists the components that are above the HUD regulated level of 1.0 mg/cm^2

Building	Component	Location	Quantity
2730	Sink	Kitchen	1 ea
2730	Counter Tile	Kitchen	40 sf
2730	Counter Tile	Restroom	30 sf
2730	Sink	Restroom	1 ea
2730	Bathtub	Restroom	1 ea

The following table lists the components that are above the Los Angeles County and LAUSD standard of 0.7 mg/cm^2

Building	Component	Location	Quantity
No Lead Detected at This Level			

Summary & Recommendations

Depending on the scope of work for the project; contractors should determine the level of contractor licensing for the abatement and/or work disturbing lead paint systems.

We recommend "lead certified" painting contractors for the painting of buildings coated with lead paint. Preparation of these surfaces falls under the "trigger task" category of OSHA 1532.1. Preparation of painted surfaces and the ultimate "guarantee" of the final painted product is better completed by a "single" contractor.

RRP certified firms should be considered for incidental work that disturbs small amounts of lead paint. These categories of work may include concrete coring (through lead paint) and structure welding (door hinges etc.).

Abatement companies with CDPH (California Department of Public Health) lead certified staff will be required for all abatement work. The companies selected will have to insure that a

certified lead supervisor be present during abatement preparation and be within two hours (response time) during abatement activities.

Painting contractors will be required to collect all paint chips from the preparation activities. The contractor will sample and categorize the waste for disposal. Proof of sampling and waste disposal will be required.

Metal components (coated with lead paint) will likely be recycled. A letter (stating acceptance of material) will be required from the contractor's recycling facility.

All other waste produced from abatement activities will be separated and staged in a safe storage area at the project site during the sampling process. The characterization of the waste can take up to two weeks and an area will need to be allocated for this purpose. The contractor will be required to conduct and pay all costs associated with the characterization of the waste. Copies (proof) of all characterization of waste will be demanded on completion and before waste transport.

Vector Environmental Consulting Inc.

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Sampling Data

Lead Sampling Data

Inspection Date: 10/25/23

Bldg.	Location	Component	Substrate	Color	Lead Mg/cm2	Comments
2730	Exterior	Wall	Stucco	Pink	0.01	
2730	Exterior	Privacy Screen	Wood	White	0.01	
2730	Exterior	Fascia	Wood	White	0.01	
2730	Exterior	Window Frame	Metal	White	0.01	
2730	Exterior	Handrail	Metal	White	0.04	
2730	Exterior	Door Frame	Wood	Brown	0.01	
2730	Exterior	Door	Wood	Brown	0.01	
2730	Interior	Wall	Plaster	Wallpaper	0.00	
2730	Interior	Wall	Plaster	White	0.01	
2730	Interior	Door Frame	Wood	White	0.00	
2730	Interior	Door	Wood	White	0.00	
2730	Interior	Counter Tile	Ceramic	White	1.90	Restroom
2730	Interior	Sink	Porcelain	White	1.00	Restroom
2730	Interior	Bathtub	Porcelain	White	2.34	Restroom
2730	Interior	Floor Tile	Ceramic	Tan	0.01	Restroom
2730	Interior	Counter Tile	Ceramic	White	1.00	Kitchen
2730	Interior	Sink	Porcelain	White	4.90	Kitchen
2730	Interior	Casework	Wood	Brown	0.01	Kitchen