Les A. Cartier and Associates, Inc.

Plan 1 of 3

Lead Risk Assessments and XRF Inspection Reports
Lead Exposure Hazard Reduction Plan

Common Area Risk Assessment, XRF Inspection Report, and Lead Exposure Hazard Reduction Plan

Project:

195 McGregor Street,
Manchester, NH 03102

Proposed Final Plan: August 11, 2015

Prepared By:

American Environmental Testing Services, LLC
1 Hardy Road, Suite #218 Bedford, NH 03110

Certification of Field Activities

Risk Assessment

Site Location:	195 McGregor St., Manchester NH 03102
Conducted By:	Warren Laskey / David Pesce
Title:	Risk Assessor
License:	NH Risk Assessor # RA-029 / RA-059
	I/We hereby certify that sampling and analyses have been conducted pursuant to He-P 1608.04 and accurately represents the conditions in the areas tested on this date
Lead Hazards Identified:	**Yes** No
Dates:	**Previous Inspections: Yes, see attached**
	Lead Dust Wipe Inspections: May 22- July 2, 2015 By Warren Laskey, RA-029 and David Pesce, RA-059. Also see attached reports by NH HHLPPP and private risk assessor, 5/11/15 – 5/18/15

Report Preparation

Prepared By:	Warren Laskey
Title:	Risk Assessor, NH License RA-029
Dates:	**May 22 through July 15, 2015**
Signature:	

Property Owner's are required to disclose lead hazards in accordance with 40 CFR Part 745.107, July 1, 1998 edition **entitled, Disclosure Requirements for Sellers and Lessors.**

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1.0 Executive Summary

American Environmental Testing Services, LLC (AETS) has been retained by Les A. Cartier and Associates, Inc. to perform lead dust analysis inspections and risk assessments at 195 McGregor St., Manchester in response to a renovation project in the building which allowed lead dust to migrate into the occupied residential units and commercial space.

Plan is proposed in three parts:

1. Plan for Lead Risk Assessment and Lead Exposure Hazard Reduction for Lofts at Mill West, Stairwells and Common Areas, 195 McGregor St., Manchester, NH

2. Plan for Lead Dust Wipe Analysis and Lead Dust Hazard Mitigation for Lofts at Mill West, 195 McGregor St., Manchester, NH

3. Plan for Unoccupied Spaces (first and second floors) dust mitigation and renovation for Lofts at Mill West, 195 McGregor St., Manchester, NH

The purpose of this three part plan is to 1) provide full risk assessments in six (previously seven) selected units based upon children present and / or pregnant women identified, with the assessment of the physical condition of components containing lead-based paint in units; common areas and stairwells 2) identify the existence, nature, severity, source and location of dust containing lead (or document that no such hazards were identified) by interpreting analytical measurements of lead in dust, and clean thoroughly where required, and 3) assess unoccupied spaces for dust, mitigate hazards previously identified and propose a renovation plan for these spaces. This document is Plan 1.

The following activities have been completed under either Plan 1 or Plan 2:

1. 98 residential units have been sampled in 10-14 locations each for lead dust per HUD protocol. Cleaning and retesting have been accomplished, with all units achieving passing results. Cleaning activities included:

   a. Cleaning of interior window sills, troughs, and wells (EPA task 1)

   b. Cleaning of finished walls (EPA task 7)

   c. Cleaning of ledges and casings surrounding windows (EPA task 9)

   d. Cleaning of areas between floorboards and bottom of baseboards (EPA task 9)

   e. Cleaning of rugs and soft furniture (EPA task 12)

2. Interior common areas (hallways and stairwells) have been sampled for lead dust per HUD protocol. The lower level amenities and leasing office have passed clearance standards. Concentrations are significantly reduced in the hallways, and these areas will be re-cleaned and cleared once all stairwell abatements have been completed, to ensure no contamination is reintroduced.

3. Risk assessments, including XRF inspections, have been conducted in six units occupied by young children.

2.0 Site Description

195 McGregor St. is a 5 story multi-use mill building with 98 residential units on its north side and commercial units to the south. The building underwent renovation by sandblasting in an unoccupied area of the first floor. The lack of completely effective containment allowed lead dust to migrate into the occupied units, interior common areas and some commercial units.

3.0 Definitions of Lead Based Paint, Lead in Dust and Lead in Soil

The State of NH & U.S. Department of Housing and Urban Development (HUD) have established a definition of lead-based paint as a dried paint film that contains lead greater than **0.5% by weight** when utilizing laboratory analysis or **equal to greater than 1.0 mg/cm^2** when utilizing X-Ray Fluorescence (XRF) analysis.

The following lead in dust threshold values are utilized to determine when corrective actions are required:

SURFACE	THRESHOLD LIMIT
Floors	40 ug/ft^2
Interior window sills	250 ug/ft^2
Window wells	400 ug/ft^2

The NH regulation for lead in soil is 400 ppm for play areas or high contact areas and 1200 ppm for residential yards.

4.0 Risk Assessments and XRF Testing in Child Occupied Units (6)

Included in this report are detailed XRF Reports of six (6) child occupied and/or pregnant women occupied units. Field measurements by XRF have been taken using standards set forth in the HUD Guidelines for the Evaluation and Control of Lead-Based Paint Hazards in Housing, 2012.

The detailed reports will show all the readings that were taken by side of building according to street location. As noted on the report floor plans, **Side "A" on the room pages is where the main front of the building (street side) is located.** Going clockwise with your back to the street ("A" side), side "B" will always be to your left, side "C" directly in front of you and side "D" to the right. Doors and windows are designated as left, center or right depending on their location on the room pages. Readings that are greater than or equal to the regulatory limit of 1.0 milligram per centimeter squared (mg/cm^2) are entered in the Lead Column of the Report.

The calibration of the RMD LPA-1 is done in accordance with Performance Characteristic Sheets (PCS). The XRF instrument is calibrated using the calibration standard block of 1.0 mg/cm^2. Three calibration readings are taken before and after each unit is tested to insure manufacturer's standards are met. All calibrations are done in the Standard Mode in accordance with the PCS.

All testing for lead-based paint will be done using the RMD LPA-1 in the *Quick Mode* setting. At least one reading will be taken for each area surveyed.

4.1 XRF Reports of Child Occupied and/or pregnant women occupied units (6) (attachment D)

Units tested by XRF: 312, 322, 331, 409, 421, 428. These units are have been assessed by July 15, 2015.

Attachment D

4.2 Paint Condition Assessment in Child Occupied and/or pregnant women occupied units (attachment D)

An assessment of the conditions of painted surfaces has been performed as part of the completion of the risk assessment. The condition of each observed component will be rated in accordance with the criteria established in Chapter 5 – Table 5.3 Conditions of Paint Film Quality of the HUD Guidelines. The following table is a reproduction of the HUD evaluation criteria applied on this project.

Type of Building Component	Total Area of Deteriorated Paint on Each Component	
	Intact	Deteriorated
Exterior components with large surfaces areas.	Entire surface is intact.	More than 10 square feet.
Interior components with large surface areas (walls, ceilings, floors, doors).	Entire surface is intact.	More than 2 square feet.
Interior and exterior components with small surface areas (window sills, baseboards, soffits, trim)	Entire surface is intact.	More than 10 percent of the total surface area of the component.

The assessment of condition for each painted surface can be found in the XRF Inspection, when completed in the appendix. Each surface is rated D for deteriorated as it corresponds to the information presented above.

5.0 Prioritization and approach for additional lead dust mitigation in residential units: See Plan 2

5.1 Summary of Summary of Previous Work: See Plan 2

5.2 Summary of Additional Planned Work: See Plan 2

6.0 Cleaning Guidelines for Residential Units: See Plan 2

7.0 XRF Testing of Stairwells and Interior Common Areas: Appendix E

XRF testing of interior common areas was conducted on July 8, 2015. Interior common areas consist of hallways on 3rd and 4th floors, lower level hallways, and all community rooms. Stairwells tested include the northeast stairwell from 4th floor to ground floor and northwest stairwell from roof to lower level, including freight elevator. The property owner will enclose all walls, ceilings, floors and stairs or otherwise address all lead exposure hazards using RRP certified individuals (with NH DHHS approved

Variance) and work will be complete on or near August 10, 2015.

8.0 COMPLETION OF LEAD RISK ASSESSMENTS AND LEHRP (PART OF APPENDIX D)

Following completion of risk assessments a Lead Exposure Hazard Reduction Plan (LEHRP) has been developed by the risk assessor with abatement or interim control options provided. Abatement activities will be performed by appropriately trained and certified individuals following He-P 1600 rules for abatement. Child occupied units will be abated in addition to cleaning adhering to the prioritization of work outlined in Plan 1, section 5.2

9.0 OPERATIONS AND MAINTENANCE (O&M) PLAN

The O&M plan will be developed for the residential portion of the mill building.

10.0 CLEANING AND ENCLOSURE PLAN FOR UNOCCUPIED SPACES: See Plan 3

Former sandblast areas shall be properly contained according to ECSI Plan dated June 18, 2015 Appendix F in Plan 3.

Summary

Floors, window sills and window wells cleaned to date have achieved clearance standards in all 98 units. As a result, opportunity for exposure to lead in the units is low, and based on the analysis of Gradient, there is no current health risk to occupants of these units. Nevertheless, Brady Sullivan plans to continue several cleanup and mitigation activities as detailed in Plan 2 to reduce the potential for lead exposure. (see Gradient 2015 memo-Appendix A-5)

State of New Hampshire
Healthy Homes and Lead Poisoning Prevention Program
Member of CONEST

LICENSED RISK ASSESSOR
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Director, Division of Public Health
NOT A LEGAL FORM OF ID

Training Due: **08/20/16**
Testing Due: **01/17/17**