Final Report

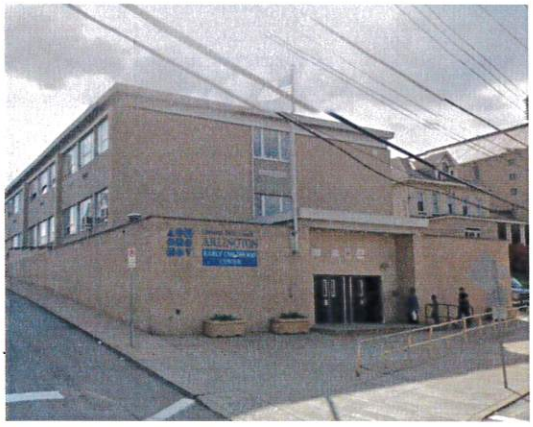
Asbestos & Hazardous Materials Inspection

for

Pittsburgh Public Schools

at

Pittsburgh Arlington Pre K-2



Prepared for:

Facilities Division
Pittsburgh Public Schools
1305 Muriel Street 15203-1513

AGX, Inc.

ASBESTOS & HAZARDOUS MATERIALS INSPECTION

of

Pittsburgh Arlington Pre K–2
2429 Charcot Street
Pittsburgh, Pennsylvania 15210

Prepared for

Facilities Division
Pittsburgh Public Schools
1305 Muriel Street 15203-1513

Prepared by

AGX, INC.
207 PINE CREEK ROAD
WEXFORD, PA 15090

November 2016

AGX JOB NO. 116-785

Prepared By: _____
N. Bollman & M. DeFloria

Reviewed By: _____
Daniel L. Winkle, Project Manager

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EXECUTIVE SUMMARY

Pittsburgh Public Schools retained AGX, Inc., (AGX) to conduct an asbestos and hazardous materials inspection of Pittsburgh Arlington Pre K–2, located at 2429 Charcot Street in Pittsburgh, Pennsylvania. Pittsburgh Arlington Pre K-2 was a two story brick building, originally constructed in the late 1950's as a Catholic School (St. Henrys). The building was acquired by Pittsburgh Public Schools in 1991. The total square footage of the building is 21,432 sq. ft.

The purpose of the asbestos and hazardous materials inspection was to identify, locate, and quantify asbestos and other potential hazardous materials, such as lead-based paint (LBP), polychlorinated biphenyls (PCB), mercury-containing fluorescent lamps and switches; chlorofluorocarbons (CFCs), NiCad and lead-acid batteries, and various other stored chemicals. Discussions with the staff of the Facilities Division indicate that there are no known Underground Storage Tanks (USTs) on the building property.

The asbestos and hazardous materials inspection consisted of an on-site inspection, sampling of accessible suspect asbestos-containing materials (ACM) and lead based paint (LBP), and quantification of all observed potentially hazardous materials.

AGX, Inc. identified the following material as ACM in the building:

Friable ACM

- Acoustic Ceiling Plaster
- Spray-On Fireproofing

Non-Friable ACM

9" White Floor Tile and Mastic
9" Tan and Salmon Floor Tile and Mastic
Interior Window Caulking
Wire Insulation
Linoleum
Exterior Door Caulking
Exterior Window Caulking
Exterior Caulking
12" Floor Tile and Mastic

The estimated cost to remove and dispose of the above-referenced ACM is **$483,720.** See Table 1 for line item cost estimates.

Brick, concrete block, mortar, and concrete are not considered suspect materials and were not sampled as part of this survey.

The following hazardous materials were identified throughout the building:

- Mercury-containing fluorescent lamps, thermostats and switches
- Fluorescent light fixture ballasts containing PCBs
- Refrigerator/freezers, water fountains, and air conditioning units with the potential of containing CFCs
- Chemicals such as stored oils, grease, paints, floor treatment products, cleaning products, and degreasers

The estimated cost to remove and dispose the above-mentioned hazardous materials is **$5,676.** See Table 2 for line item cost estimates.

Lead-based paint, as defined by the Occupational Safety and Health Administration (OSHA) was documented as present throughout the building. Remediation of lead based paint is not required prior to building renovation or demolition. Lead-in-air would be an OSHA worker exposure issue, and contractors would have an obligation to monitor worker exposure and provide appropriate PPE in accordance with 29 CFR 1926.62.

The EPA RRP (Renovation, Repair and Painting) Rule applies if the facility becomes a "Child Occupied" facility where it is used by children that are less than 6 years of age. All contractors who disturb over six square feet per room of lead based paint on this project must be RRP certified contractors and must employ proper work techniques when disturbing the lead containing surfaces.

Table 1
Cost Estimate
Asbestos-Containing Materials
Pittsburgh Arlington Pre K–2

ACM	LOCATION	APPROXIMATE QUANTITY	COST ESTIMATE
Acoustic Ceiling Plaster	1st Floor Corridor 109, 2nd Floor Corridor 209 & Room 213	2,800 Square Feet	$19,600
Spray-On Fireproofing	On Structural Steel Throughout The Building	25,300 Square Feet	$379,500
9" White Floor Tile and Mastic	Room 117 & 118	2,800 Square Feet	$300
9" Tan and Salmon Floor Tile and Mastic	Room 103, 104, 106, 107, 108, 201, 202, 203, 204, 205, 206, 207, 208, 213 & 214	10,980 Square Feet	$43,920
Interior Window Caulking	Throughout Building	64 Units 2,400 Linear Feet	$9,600
Wire Insulation	Throughout Building	19 Unit Vents	$1,900
Linoleum	Room 116 Under Carpet	200 Square Feet	$1,000
Exterior Door Caulking	12 Doors	720 Linear Feet	$1,800
Exterior Window Caulking	Throughout Building	64 Units 2,400 Linear Feet	$9,600
Exterior Caulking	Around Stone Façade, Unit Vent Openings & Exterior	4,000 Linear Feet	$15,000
12" Floor Tile and Mastic	Room B5, B6 & B7	375 Square Feet	$1,500
		TOTAL	**$483,720**

Note: Cost estimates reflect 2016 unit pricing averages from select Pittsburgh base asbestos abatement firms. Costs may vary based on the magnitude of materials removed, and whether competitive bidding is used.

Table 2
Cost Estimate
Hazardous Materials
Pittsburgh Arlington Pre K-2

ITEM	LOCATION	QUANTITY	RECYCLE/ DISPOSAL COST
Compressor Oil	Room B14,	10 gallons	$70.00
Paint/Thinner & Spray Paint	Room B14	6 gallons	$84.00
Degreaser	Room B14, Conference Room,	2 gallons	$30.00
All Purpose Cleaner	Room B14, Room B9, Room B3,	7 gallons	$105.00
3M Cleaners	Room B14,Room 110, 210, Room B2	2 gallons	$45.00
Floor Cleaners & Strippers	Room B9,Lobby	100 gallon	$150.00
Starting Fluid	Room B14	0.5 gallon	$7.00
Boiler Water Treatment	Room B13,	15 gallons	$225.00
CFC Equipment	Room 115, Room B6 & Room B3	(1) Fridge/Freezer (1) Walk-in Freezer (1) Window Air Conditioner	$1,300.00
Potential PCB Ballasts	Throughout building	521	$1,200.00
Potential PCB Oil Containing Equipment	Room B9	Emergency Generator Air Compressor Switch Gear	$1,400.00
Fluorescent Lamps and Bulbs	Throughout building	1,148 Lamps	$865.00
Potential Mercury Containing Items	Throughout building	(27) Thermostats & Controls	$135.00
Potential Lead Containing Items	Throughout building	(12) Exit Signs (batteries)	$60.00
		TOTAL	**$5,676.00**

Footnotes
1. Miscellaneous office and cleaning supplies such as printer toner, ink cartages, spray cleaners, and art supplies were not included.
2. Remediation of lead paint is not generally required for building renovation or demolition, therefore cost estimates are not provided.

Notes
Cost estimates reflect 2016 unit pricing averages gained from select Pittsburgh based hazardous remediation firms.
NA = Not Applicable

1.0 Introduction

AGX conducted an inspection of the Pittsburgh Arlington Pre K-28 located at 2429 Charcot Street in Pittsburgh, Pennsylvania, to identify, locate and quantify asbestos-containing materials (ACM) and other hazardous materials such as: lead based paint, mercury-containing fluorescent lamps (including fluorescent, metal halide, high-pressure sodium, and mercury-vapor); thermostats and other mercury containing items; polychlorinated biphenyls (PCB)-containing ballasts and oil containing equipment; stored solvents, paints, and other miscellaneous chemicals consistent with a Phase I Environmental Site Assessment.

The inspection was conducted October 5, and 11, 2016 by Mr. Nickolas Bollman, Mr. Scott May, Mr. Dave Grumboski, and Mr. Mark DeFloria, certified Pennsylvania Asbestos Inspectors, numbers 034447, 01115, 019944 and 001788 respectively. As part of this assessment, bulk samples were collected from accessible suspect asbestos-containing materials and paint systems for laboratory analysis. Mr. Dave Grumboski, certified Pennsylvania Lead Risk Assessor number 034447 conducted the Lead-Based Paint Inspection.

During the writing of this report a review was made of previous credible sampling data on file at the Pittsburgh Board of Education Facilities Office and at AGX. The previous sampling data has been incorporated into this report.

2.0 Asbestos-Containing Materials (ACM)

AGX conducted the inspection to identify, locate, and quantify ACM throughout the building. AGX performed a visual inspection of all accessible areas within the building. An appropriate number of samples were collected of any suspect materials that were observed.

Suspect ACM was classified into homogeneous areas, and bulk samples were collected from each homogeneous area based on the random sampling protocol, as described by the United States Environmental Protection Agency (EPA), under the Asbestos Hazard Emergency Response Act (AHERA), or as described in this report. All bulk samples were sealed in plastic bags, given unique sample numbers, and logged with an appropriate chain of custody. The samples were analyzed by AGX, Inc., which is accredited by the National Voluntary Laboratory Accreditation Program (NVLAP, Lab code 101578-0), using Polarized Light Microscopy (PLM) with dispersion staining, as specified by the EPA method 600/R-93/116. Bulk samples with a content of less than 10% asbestos were also point counted.

AGX identified a total of sixty (60) homogeneous areas and collected seventy-nine (79) bulk samples of suspect ACM throughout the building. The following materials have been sampled and found to be ACM.

AGX, Inc. identified the following material as ACM in the school:

Friable ACM

- Acoustic Ceiling Plaster
- Spray-On Fireproofing

Non-Friable ACM

9" White Floor Tile and Mastic
9" Tan and Salmon Floor Tile and Mastic
Interior Window Caulking
Wire Insulation
Linoleum
Exterior Door Caulking
Exterior Window Caulking
Exterior Caulking
12" Floor Tile and Mastic

The estimated cost to remove and dispose of the above-referenced ACM is **$483,720.** See Table 1 for line item cost estimates.

Table 1 identifies the location of ACM identified in this inspection, location, approximate quantity, and cost estimates for removal:

Table 1
Cost Estimate
Asbestos-Containing Materials
Pittsburgh Arlington Pre K–2

ACM	LOCATION	APPROXIMATE QUANTITY	COST ESTIMATE
Acoustic Ceiling Plaster	1st Floor Corridor 109, 2nd Floor Corridor 209 & Room 213	2,800 Square Feet	$19,600
Spray-On Fireproofing	On Structural Steel Throughout The Building	25,300 Square Feet	$379,500
9" White Floor Tile and Mastic	Room 117 & 118	2,800 Square Feet	$300
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Linoleum	Room 116 Under Carpet	200 Square Feet	$1,000
Exterior Door Caulking	12 Doors	720 Linear Feet	$1,800
Exterior Window Caulking	Throughout Building	64 Units 2,400 Linear Feet	$9,600
Exterior Caulking	Around Stone Façade, Unit Vent Openings & Exterior	4,000 Linear Feet	$15,000
12" Floor Tile and Mastic	Room B5, B6 & B7	375 Square Feet	$1,500
		TOTAL	**$483,720**

Note: Cost estimates reflect 2016 unit pricing averages from select Pittsburgh base asbestos abatement firms. Costs may vary based on the magnitude of materials removed, and whether competitive bidding is used.

The complete Asbestos Inspection Report is located in **Appendix A – Asbestos Inspection Report**. Inspectors' certifications are located in **Appendix E – Accreditations**.

3.0 Hazardous Materials Inspection

3.1 Fluorescent Lamps

AGX identified approximately one thousand one hundred and forty-eight (1,148) mercury-containing fluorescent tubes throughout the building. The term lamp refers to mercury-containing lamps, fluorescent tubes or bulbs, metal halide, high-pressure sodium, and mercury-vapor lamps.

Disposal costs average between 25 and 50 cents per four-foot tube and 75 cents to one (1) dollar per eight-foot tube, plus the cost of transportation and any additional landfill fees. An alternative to disposal is recycling. The average cost to recycle fluorescent tubes is around 10 cents per foot, or about 40 cents per four-foot tube (80 cents per eight-foot tube). The average cost to recycle high intensity discharge (HID) lamps is approximately $2.50 per lamp.

Fluorescent tubes were added to the EPA list of "universal wastes" in 1999. "Universal wastes" are hazardous wastes, with less stringent requirements for storing, transporting, and collection. Under federal law, these lamps are considered hazardous waste if they fail the Toxic Characteristic Leaching Procedure (TCLP) test. Under this test, the waste can contain no more than 0.2 milligrams per liter (mg/l) of mercury.

The majority of spent fluorescent and high-intensity discharge (HID) lamps, however, fail the TCLP test. Therefore, it should be assumed that all used lamps are hazardous, unless proven otherwise. Current production fluorescent tubes will fail the TCLP test for mercury, while older (pre-1988 production) tubes will fail the TCLP test for cadmium. HID lamps will fail the TCLP test for both mercury and lead. The Universal Waste Rule did give states the authority to add products to their individual waste rules.

Therefore, it is recommended that all mercury-containing lamps be handled, stored, and transported in such a manner that they are protected from damage and not broken. If impacted by building renovation/demolition activities, all mercury-containing lamps should be removed from each fixture. Mercury-containing lamps should be disposed or recycled in accordance with USEPA and the Commonwealth of Pennsylvania hazardous waste regulations and guidelines. Separate estimated costs to remove/dispose or remove/recycle the lamps are found in **Table 2, Hazardous Materials**.

3.2 Polychlorinated Biphenyls (PCBs)

PCBs can be found in a number of different electrical and hydraulic pieces of equipment. Such equipment typically includes oil-filled power transformers, capacitors, and electric ballasts, and pieces of equipments that use hydraulic oil. All ballasts manufactured after July 1, 1978, that do not contain PCBs, are required to be clearly marked "No PCBs." There are two primary federal regulations that govern the disposal of PCB ballasts:

- Toxic Substance Control Act (TSCA) 40 CFR Part 761
- Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) or Superfund Act

TSCA regulates leaking ballasts and requires the PCB liquids to be drained and incinerated in a TSCA-approved disposal facility or in a chemical waste landfill. Under the Superfund laws, PCBs are specifically listed as a hazardous substance. Sixteen (16) ballasts collectively contain approximately one pound of PCBs, which meets the requirements for a reportable quantity of waste.

Therefore, based on TSCA and CERCLA regulations, PCB-containing ballasts, in excess of 16, must be handled and removed as PCB-containing waste for proper disposal at an EPA-approved chemical waste landfill or high temperature incinerator prior to demolition/renovation of the building. An approved company may also recycle the ballasts.

There were six (6) types of fixture identified. Surface mounted 8' x 8" fixtures with 2 tubular lamps (A). Suspended 8' x 12" fixtures with 4 tubular lamps (B). Surface mounted 8' x 12" fixtures with 4 tubular lamps (C). Suspended 8' x 12" fixtures with 4 tubular lamp (D). There are 4' x 2' fixtures with 4 tubular lamps recessed in the ceiling (E). There are 4' x 24" surface mounted fixtures with 3 tubular lamps recessed in the ceiling (F).

One of the fixtures examined during our screening contained T-12 ballasts. The Type D, E, & F were newer fixtures and did not contain T-12 Ballasts. Many of the ballast checked were marked "No PCBs" replacement ballasts. Five hundred and twenty-one (521) T-12 ballasts were identified in Type A, B, and C fixtures.

The average cost for high-temperature incineration is $1.50 per pound, which is approximately $5.25 per ballast. The average cost for recycling is $1.00 per pound or approximately $3.50 per ballast. Disposal at a chemical or hazardous waste landfill is based on disposal of a 55-gallon drum of ballasts. The average cost is $100.00 per 55-gallon drum, which is approximately $0.50 per ballast. The costs do not include packaging, transportation, or profile fees. High-temperature incineration or recycling eliminates future CERCLA liabilities, while liability will continue for landfill disposal. The estimated cost to remove and dispose of the assumed PCB-containing electric ballasts is found in **Table 2 – Cost Estimate, Hazardous Materials.**

The estimated cost to remove assumed, one (1) emergency generator and one (1) air compressor and (1) switch gear located in Room B9 is also found in **Table 2 – Cost Estimate, Hazardous Materials**. The Polychlorinated Biphenyls (PCB) Screening Report is located in **Appendix B – Polychlorinated Biphenyls (PCB) Screening Report.**

3.3 Chlorofluorocarbons (CFCs)

CFCs are primarily used as a refrigerant and can be found in heating, ventilation, and air conditioning (HVAC) units, refrigerators, freezers, vending machines, and water coolers/fountains. If impacted by building renovation/demolition activities, these units should be properly purged prior to disposal of the units. The CFCs must be handled and purged by properly licensed contractors and/or personnel, abiding by all Federal, State, and local regulations. AGX identified one (1) walk-in cooler/freezer in Room B3. A window mounted unit air conditioner was identified in Room 115. A commercial style refrigerator was identified on Room B6. This equipment may contain CFCs. Window mount air conditioning units, household style refrigerators and freezers are not part of the building mechanical system and can easily be transported to another location without releasing any CFCs into the atmosphere.

The release of ozone-depleting substances is restricted under the Clean Air Act. All CFCs are required to be purged from the equipment prior to the commencement of demolition/renovation activities. Properly licensed personnel and contractors must be used to handle and purge the CFCs, abiding by all Federal, State, and local regulations. Qualified Pittsburgh Public Schools maintenance personnel should be able to purge and transport the CFC-containing equipment. The cost of handling and purging of the CFC units averages approximately $60.00 per unit. The estimated cost to handle and purge the CFC-containing units is found in **Table 2, Hazardous**

Materials.

3.4 Batteries

Nickel-cadmium (NiCAD) and lead-acid batteries can be typically found in exit signs and emergency lighting units. Exit signs and emergency lighting units that are hard wired into the building electrical system were not included counted in this assessment. Twelve (12) exit signs or emergency lights which contain batteries were identified in the school.

All batteries should be disposed or recycled in accordance with USEPA and the Commonwealth of Pennsylvania hazardous waste regulations and guidelines.

3.5 Mercury

Mercury may be present inside thermostats, thermometers, switches and laboratory drain traps. AGX inspected select thermostats present through-out the school. All inspected thermostats appeared to be mercury containing. Twenty-seven (27) mercury thermostats were identified throughout the building. .

Thermometers, mercury switches and, if present, thermostats should be disposed or recycled in accordance with USEPA and the Commonwealth of Pennsylvania hazardous waste regulations and guidelines prior to any demolition/renovation activities. The estimated cost to remove and dispose or recycle mercury containing items is found in **Table 2, Hazardous Materials**.

3.6 Storage Tanks

The school grounds were inspected for visual evidence of storage tanks containing fuels or other hazardous materials. No storage tanks were noted. Maintenance personnel had no knowledge of boilers previously being fueled by oil.

3.7 Miscellaneous Materials

Various solvents, paints, chemicals, equipment and other miscellaneous hazardous materials were found throughout the building. AGX identified the following:

- Compressor Oil
- Paint/Thinner & Spray Paint
- Degreaser
- All Purpose Cleaner
- 3M Cleaners
- Floor Cleaners & Strippers
- Starting Fluid
- Boiler Water Treatment
- CFC Equipment
  - Fridge/Freezer
  - Walk-in Freezer
  - Window Air Conditioner
- Potential PCB Oil Containing Equipment
  - Emergency Generator
  - Air Compressor
  - Switch Gear
- Fluorescent Lamps and Bulbs
- Potential Mercury Containing Items
  - Thermostats & Controls
- Potential Lead Containing Items
  - Exit Signs (batteries)

Storage and filing cabinets within the classrooms were not inspected for potential hazardous materials.

The estimated cost to remove and dispose of the identified chemicals is found in the following table.

Table 2
Cost Estimate
Hazardous Materials
Pittsburgh Arlington Pre K-2

ITEM	LOCATION	QUANTITY	RECYCLE/ DISPOSAL COST
Compressor Oil	Room B14,	10 gallons	$70.00
Paint/Thinner & Spray Paint	Room B14	6 gallons	$84.00
Degreaser	Room B14, Conference Room,	2 gallons	$30.00
All Purpose Cleaner	Room B14, Room B9, Room B3,	7 gallons	$105.00
3M Cleaners	Room B14,Room 110, 210, Room B2	2 gallons	$45.00

ITEM	LOCATION	QUANTITY	RECYCLE/ DISPOSAL COST
Floor Cleaners & Strippers	Room B9,Lobby	100 gallon	$150.00
Starting Fluid	Room B14	0.5 gallon	$7.00
Boiler Water Treatment	Room B13,	15 gallons	$225.00
CFC Equipment	Room 115, Room B6 & Room B3	(1) Fridge/Freezer (1) Walk-in Freezer (1) Window Air Conditioner	$1,300.00
Potential PCB Ballasts	Throughout building	521	$1,200.00
Potential PCB Oil Containing Equipment	Room B9	Emergency Generator Air Compressor Switch Gear	$1,400.00
Fluorescent Lamps and Bulbs	Throughout building	1,148 Lamps	$865.00
Potential Mercury Containing Items	Throughout building	(27) Thermostats & Controls	$135.00
Potential Lead Containing Items	Throughout building	(12) Exit Signs (batteries)	$60.00
		TOTAL	**$5,676.00**

Footnotes
1. Miscellaneous office and cleaning supplies such as printer toner, ink cartages, spray cleaners, and art supplies were not included.
2. Remediation of lead paint is not generally required for building renovation or demolition, therefore cost estimates are not provided. Also, see below or information regarding the EPA's RRP rule for "Child Occupied" facilities.

Notes
Cost estimates reflect 2016 unit pricing averages gained from select Pittsburgh based hazardous remediation firms.
NA = Not Applicable

The Hazardous Materials Study Report is located in **Appendix C – Hazardous Materials Study.**

4.0 Lead-Based Paint (LBP)

Five (5) of the seven (7) bulk paint samples collected from representative building components contained measureable amounts of lead in the paint. Based on the representative sampling the following painted components; plaster walls, door framing, stairwell components, lockers and exterior front railing contained measureable amounts of lead in the paint. All paint samples with measureable concentrations of total lead are considered regulated under the Occupational Safety and Health Administration (OSHA).

The OSHA Lead in Construction Standard (29 CFR 1926.62) requires all contractors performing demolition or renovation activities to notify and provide training for their employees involved in the alteration and/or repair of lead-containing building components. The contractor is also required to conduct an initial Employee Exposure Assessment. Unless "Child Occupied", there are no requirements for removing lead based paint during renovation or demolition of buildings, however means of minimizing the migration of lead dust must be implemented. In addition, waste stream sampling of renovation/demolition materials is required under the Resource Conservation and Recovery Act (RCRA).

In addition the above mentioned OSHA requirements, the EPA's RRP (Renovation, Repair and Painting) Rule will apply for the parts of the building which will be "Child Occupied" - used by children less than 6 years of age. All contractors who disturb lead based *pain in child occupied rooms*; over six square feet per room, must be RRP certified contractors and must employ proper work techniques when disturbing the lead containing surfaces.

The samples were analyzed by RJ Lee Group, 350 Hochberg Road, Monroeville, Pennsylvania, using ASTM D3335-85A Atomic Absorption Spectrophotometry (AAS). R. J. Lee Groups, Inc., is accredited by the American industrial Hygiene Association (AIHI) for metals analysis. The lead-based paint report including, paint chip sampling form and the laboratory analysis are found in **Appendix D – Lead-Based Paint Inspection.**

5.0 Summary

AGX performed an inspection for asbestos and hazardous materials throughout all accessible areas of the Pittsburgh Arlington Pre K–2, located at 2429 Charcot Street, Pittsburgh, Pennsylvania. Asbestos, lead paint and hazardous materials were identified in the building and included mercury-containing light tubes, thermostats, switches, PCB-containing light ballasts, potential PCB-containing equipment, lead-acid batteries, potential CFC containing equipment, and miscellaneous stored chemicals.

Based on the results and findings of the building inspection, the following regulations may apply:

ACM that will be impacted by future renovation/demolition activities should be removed and disposed of as ACM waste according to all applicable asbestos regulations. The Pennsylvania Department of Labor and Industry and the Allegheny County Health Department (ACHD) requires that asbestos abatement be completed by certified contractors. Assumed materials should be properly characterized for asbestos content prior to disturbance.

All hazardous materials/equipment impacted by renovation or demolition activities should be removed by properly trained contractors and/or personnel, and the materials disposed of in accordance with USEPA and Commonwealth of Pennsylvania hazardous waste regulations and guidelines.

Painted substrates in the school were found to contain lead. In accordance with OSHA Standard 29 CFR 1926.62, contractors are required to notify and train all employees involved in the construction, alteration, and/or repair of lead-containing building components, of the presence of lead. The Contractors are also required to conduct an initial Employee Exposure Assessment in accordance with 29 CFR 1926.62 (d) (1) (i).

The EPA's RRP (Renovation, Repair and Painting) Rule will apply when the renovated facility will be "Child Occupied" - used by children less than 6 years of age. This means that all contractors who disturb lead based *paint*; over six square feet per room, must be RRP certified contractors and must employ proper work techniques when disturbing the lead containing surfaces.

The OSHA Lead in Construction Standard (29 CFR 1926.62) requires all contractors performing demolition or renovation activities to notify and provide training for their employees involved in the alteration and/or repair of lead-containing building components. The contractor is also required to conduct an initial Employee Exposure Assessment. Unless "Child Occupied", there are no requirements for removing lead based paint during renovation or demolition of buildings however means of minimizing the migration of lead dust must be implemented. In addition, waste stream sampling of renovation/demolition materials is required under the Resource Conservation and Recovery Act (RCRA).