

Limited Lead Paint Inspection Addendum

82 Craftsbury Road
Greensboro, VT

Performed for: The Town of Greensboro



Performed by:



EverGreen Environmental Health & Safety, Inc.
345 May Farm Road
Barton, VT 05822

802.239.4696

Lead Inspector:
Michelle Lussier VT# IT886140

Michelle Lussier

Table of Contents

- 1.0 Introduction 3**
- 1.1 BACKGROUND INFORMATION 3
- 2.0 Materials and Methods 3**
- 2.1 GOVERNING PROTOCOLS 3
- 2.2 LIMITED LEAD BASED PAINT TESTING 3
- 2.3 BUILDING COMPONENT LABELING 4
- 2.4 LEAD DUST WIPE CLEARANCE SAMPLING 4
- 3.0 Standards and Regulatory Requirements 4**
- 3.1 RESIDENTIAL LEAD STANDARDS 4
- 3.2 THE FEDERAL EPA RENOVATION, REPAIR, AND PAINTING RULE [EPA RRP RULE] 5
- 4.0 Results and Discussion 5**
- 4.1 XRF TESTING RESULTS 5
- 4.2 DUST WIPE SAMPLING 6
- 5.0 Summary 6**
- 6.0 Limitations 6**

- Appendix A Dust Wipe Sampling Laboratory Results
- Appendix B Floor Plan Sketch
- Appendix C Heuresis Pb200i HUD Performance Characteristic Sheet and Calibration
- Appendix D Certifications and Licensures

1.0 INTRODUCTION

This report details a limited lead-based paint inspection performed on the building located at 82 Craftsbury Road in Greensboro, VT. Only a single door in the entrance to the second floor of the building was included in this inspection. Grades 4th through 6th of Lakeview Elementary School hold classes on this floor of the building. The inspection was performed by EverGreen Environmental Health and Safety, Inc., (EverGreen) on September 12, 2018 under contract with The Town of Greensboro.

1.1 BACKGROUND INFORMATION

This inspection is a follow-up to a previous work performed on the second floor of the school completed on August 24, 2018. During the original inspection, the door where students enter the back of the building was found positive for lead based paint. This door has been renovated and the door components had been replaced. Students and staff had been relocated to another school building while the renovation was ongoing, to eliminate any potential lead dust exposure. Before the students returned, the Town of Greensboro requested that XRF verification be provided and dust clearance testing be performed to ensure that no lead hazard remained. XRF lead testing will indicate if lead based paint is present on the components and lead dust wipe clearance sampling will determine if the area was properly cleaned after the renovations were completed.

2.0 MATERIALS AND METHODS

2.1 GOVERNING PROTOCOLS

The protocol used for this inspection is based on the practices and procedures in the United States Department of Housing and Urban Development [HUD] 2012 *“Guidelines for the Evaluation and Control of Lead Based Paint Hazards in Housing”*, 2012 Revision [HUD Guidelines] include the 1997 Chapter 7 revisions, the United State Environmental Protection Agency’s [USEPA] 40 CFR Part 745 (*Lead: Identification of Dangerous Levels of Lead; Final Rule; January 5, 2001*). HUD publishes the only known protocol for Lead Based Paint Inspections.

The HUD Guidelines and 40 CRF Part 745 set a regulatory level of 1.0 mg/cm² for lead in paint. This inspection was conducted using this level as the definition of lead-based paint [LBP]. Any X-ray Fluorescence [XRF] result that is equal to or greater than of 1.0 mg/cm² for lead is considered by Vermont and Federal law to be positive for lead based paint.

2.2 LIMITED LEAD BASED PAINT TESTING

Using an Heuresis Pb200i XRF, serial # 1123, readings were taken from door components of the second-floor door that connects the entryway to the hallway on the rear of the building. The procedures listed below were followed during this inspection:

XRF Safety Considerations

The XRF was only operated by individual who had successfully completed the manufacturer's training requirements for the Pb200i Lead Paint Analyzer. The inspector followed all required safety procedures.

XRF Calibration

The Heuresis Pb200i has been developed such that the normal operating mode (Action Level Mode) is also the calibration mode. Three readings are taken using the test film block (wood substrate) that has lead content of 1.02 mg / cm². Since it is known that the Pelican Case housing the instrument does not contain lead, the company recommends performing the three shots per calibration check by placing the test film block on top of the case. These checks are taken at the beginning of each day (or job), at least every four hours during the ongoing inspection, and at the end of each day (or job). The calibration check tolerance for this instrument is ± 0.2 mg / cm². **No substrate correction is required for this instrument.**

2.3 BUILDING COMPONENT LABELING

The HUD Guidelines outline a building component labeling system that was followed during the conduction of this inspection concurrent with the original inspection. The floor plan sketch from the original inspection is included in Appendix B of this report with the door that was tested circled in red.

2.4 LEAD DUST WIPE CLEARANCE SAMPLING

A lead dust wipe sample was collected using the protocol established in the 1995 EPA document "*Residential Sampling for Lead: Protocols for Dust and Soil Sampling, Final Report.*" The dust wipe was taken during the XRF inspection using a 1 x 1 square foot template to sample the area of the floor where door component removal had taken place. The required wet 15cm x 15cm ASTM E 1792 Ghost Wipe™ was used. The collected sample was placed in 50 ml centrifuge tubes, labeled, and submitted to laboratory meeting both the National Lead Laboratory Accreditation Program [NLLAP] and State of Vermont requirements. The samples were submitted using established chain of custody methods for lead analysis.

Due to the limited area of renovation, one (1) dust wipe sample was taken. Results of the lead dust wipe analysis are outlined in section 4.0 of this report.

3.0 STANDARDS AND REGULATORY REQUIREMENTS

3.1 RESIDENTIAL LEAD STANDARDS

Lead is a recognized health hazard. Exposures to lead are regulated by the Occupational Health and Safety Administration (OSHA) in the workplace, and by the Environmental Protection Agency (EPA) in



soil, water, air, and solid waste. Residential lead hazard standards have been promulgated and adopted by both the EPA and HUD. These standards are targeted towards preventing lead poisoning in children.

In 1992, U.S. Federal legislature enacted into law the Housing and Community Development Act of 1992. Title ten (Title X) of this Act is known as the "Residential Lead-based Paint Hazard Reduction Act of 1992". This law defines Lead-based Paint (LBP) as paint that contains lead $\geq 1.0 \text{ mg/cm}^2$ (milligrams per square centimeter area) or has a lead content at or greater than 0.5% by weight. Under the HUD regulations, lead is considered a health hazard when equal to or exceeding 10 micrograms of lead in dust per square foot on floors, 100 micrograms of lead in dust per square foot on interior window sills, and 400 parts per million (ppm) of lead in bare soil in children's play areas, or 1200 ppm average for bare soil in the rest of the yard. The use of lead in paint was regulated by the U.S. Consumer Product Safety Commission in 1978; the legal maximum lead content of paint sold after this date is limited to no more than 0.06% by weight.

3.2 THE FEDERAL EPA RENOVATION, REPAIR, AND PAINTING RULE [EPA RRP RULE]

Common renovation activities like sanding, cutting, and demolition can create hazardous lead dust and chips by disturbing lead-based paint, which can be harmful to adults and children.

To protect against this risk, on April 22, 2008, EPA issued a rule requiring the use of lead-safe practices and other actions aimed at preventing lead poisoning. Under the rule, beginning April 22, 2010, contractors performing renovation, repair and painting projects that disturb lead-based paint in homes, child care facilities, and schools built before 1978 must be certified and must follow specific work practices to prevent lead contamination.

EPA requires that firms performing renovation, repair, and painting projects that disturb lead-based paint in pre-1978 homes, child care facilities and schools be certified by EPA. These firms must use certified renovators who are trained by EPA-approved training providers to follow lead-safe work practices. Individuals can become certified renovators by taking an eight-hour RRP training course from an EPA-approved training provider.

4.0 RESULTS AND DISCUSSION

4.1 XRF TESTING RESULTS

The second-floor door and components that had previously tested positive for lead based paint during the August 24th inspection have been renovated in a manner that removed the lead positive components. On the day of the follow up inspection these components tested free of lead-based paint as defined by HUD and EPA standards. Since testing has determined that no lead based component remain, the interior of the second floor of the building is now free of lead-based paint.



Specific results and components tested are located below:

1. Hallway Door B Transom Casing: 0.1 mg/cm²
2. Hallway Door B Jamb: -0.0 mg/cm²
3. Main Entrance Door D (Double doors): 0.1 mg/cm²
4. Main Entrance Door D Casing: 0.1 mg/cm²

4.2 DUST WIPE SAMPLING

The lead dust wipe result is below:

1. Hall Floor: <10 µg/ft²

This wipe sample indicated that no lead dust was present on the floor sampled above the laboratories limit of detection of 10 µg/ft². This indicates that the dust level was below any regulatory limits. No lead dust hazard exists on this floor. Laboratory results are located in Appendix A of this report.

5.0 SUMMARY

This inspection confirms that the interior of the second floor of this building is free of lead-based paint and no lead dust hazard exists on the hall floor where renovation had occurred.

This inspection, and the original inspection on August 24, does not constitute a complete inspection of the entire building. An additional lead based paint inspection of the basement and third floor space along with the exterior of the building should be completed to determine if the building is lead free. Maintenance of surfaces on these levels of the building and the exterior should be performed as if lead based paint is present to prevent hazard creation that may impact students on the second floor.

It should be noted that The State of Vermont is in the process of changing the lead-based paint regulations to expand beyond residential and child-occupied facilities to include all public buildings where renovation may take place. This legislation has been signed by Governor Scott but has not been finalized by the EPA. The legislation is due to be enacted in November 2019; additional lead based paint inspection work and hazard control should be considered when planning any future renovation of the building.

6.0 LIMITATIONS

EverGreen provided these services consistent with the level and skill ordinarily exercised by members of the Industrial Hygiene profession currently providing similar services under similar circumstances at the time the services were provided. This statement is in lieu of other statements either expressed or



implied. This report is intended for the sole use of the Client, the Town of Greensboro. The scope of services performed in execution of this evaluation may not be appropriate to satisfy the needs of other users, and use or re-use of this document, the findings, conclusions, or recommendations is at the risk of said user.

As with all such assessments, the results of the sampling represent conditions found on the date of the survey and may not represent conditions found at other times. Additionally, this assessment was limited with respect to the specific parameters indicated above and should not be construed to be a comprehensive evaluation or a definitive representation of conditions within the facility. The information presented in this report is intended to be used as a guide to evaluate the need for further investigation or the need for modifications to the processes or procedures surveyed.

The Client recognizes and agrees that all testing and remediation methods have reliability limitations, no method nor number of sampling locations can guarantee that a condition will be discovered within the performance of the services as authorized by the Client. Additionally, the passage of time may result in a change in the environmental characteristics at this site.

This report does not warrant against future operations or conditions that could affect the recommendations made. The results, findings, conclusions, and recommendations expressed in this report are based only on conditions that were observed during EverGreen's inspection of the site.

Appendix A: Dust Wipe Sampling Laboratory Results



Analysis Report

Schneider Laboratories Global, Inc

2512 W. Cary Street • Richmond, Virginia • 23220-5117
804-353-6778 • 800-785-LABS (5227) • Fax 804-359-1475

Customer Evergreen Environmental Health & Safety (4439)
Address 345 May Farm Road
Barton, VT 05822

Order #: 279362

Matrix Wipe
Received 09/14/18
Analyzed 09/14/18
Reported 09/14/18

Project Lakeview Union CLR
Location Greensboro, VT
Number LBP-09-082418-CLR

Sample ID	Cust. Sample ID	Location	Sample Date			
Parameter		Method	Area	Total	Conc.	RL*
279362-001	01	Hall Flr	09/12/18			
Lead		EPA 7000B / 3050B	1.00 ft2	<10.0 µg/wipe	<10.0 µg/ft2	10.0 µg/ft2

Analyst ESB
279362-09/14/18 04:27 PM

Reviewed By **Jennifer Lee**

EPA Lead Clearance

Location	Clearance	Unit
Floors	< 40.0	µg/ft2
Interior Window Sills	< 250	µg/ft2
Window Troughs	< 400	µg/ft2

HUD Grantee Lead Clearance

Location	Clearance	Unit
Interior Floors	< 10.0	µg/ft2
Porch Floors	< 40.0	µg/ft2
Interior Window Sills	< 100	µg/ft2
Window Troughs	< 100	µg/ft2

Minimum Total Reporting Limit: 10.0 µg/wipe. All internal QC parameters were met. Unusual sample conditions, if any, are described. Surrogate Spike results designated with "D" indicate that the analyte was diluted out. "MI" indicates matrix interference. Concentration and *Reporting Limit (RL) based on areas provided by client. Values are reported to three significant figures. The test results reported relate only to the samples submitted. AIHA-LAP, LLC accredited for Lead (Lab ID 100527).



SCHNEIDER LABORATORIES GLOBAL, INC.

2512 West Cary Street, Richmond, Virginia 23220-5117
804-353-6778 • 800-785-LABS (5227) • Fax 804-359-1475
www.slabin.com e-mail: info@slabin.com

WO Label:



V:\279\279362
fghraizi 9/14/2018 12:31:00 PM
U.S. Mail

Submitting Co. EverGreen Environmental Health & Safety	Lab Use- WO #	Phone # (802) 239-4696
	Acct # 4439	Fax (802) 239-4961
		E-mail mll@evergreen-environment.com
Project Name: lakeview union CLR		Special Instructions [include requests for special reporting or data packages]
Project Location: Greensboro, VT		
Project Number: CBP-09-082418-CLR		
PO Number:	State Of Collection Vermont	

Turn Around Time	Matrix / Sample Type (Select ONE)	Tests / Analytes (Select ALL that Apply)		
<input type="checkbox"/> 2 hours* <input type="checkbox"/> Same day* <input checked="" type="checkbox"/> 1 business day* <input type="checkbox"/> 2 business day* <input type="checkbox"/> 3 business days* <input type="checkbox"/> 5 business days* <input type="checkbox"/> Full TCLP (10d) <input type="checkbox"/> Weekend* * not available for all tests Schedule rush organics, multi-metals & weekend tests in advance.	All samples on form should be of SAME matrix type. Use additional forms as needed. <input type="checkbox"/> Air <input type="checkbox"/> Solid <input type="checkbox"/> Aqueous <input type="checkbox"/> Waste <input type="checkbox"/> Bulk <input type="checkbox"/> Wastewater <input type="checkbox"/> Hi-Vol Filter (PM10) <input type="checkbox"/> Water, Drinking <input type="checkbox"/> Hi-Vol Filter (TSP) <input type="checkbox"/> Compliance <input type="checkbox"/> Oil <input checked="" type="checkbox"/> Wipe <input type="checkbox"/> Paint <input type="checkbox"/> Wipe, Composite <input type="checkbox"/> Sludge <input type="checkbox"/> _____ <input type="checkbox"/> Soil <input type="checkbox"/> _____	Asbestos Air / Fiber Counts <input type="checkbox"/> PCM (NIOSH 7400) <input type="checkbox"/> TEM (AHERA) <input type="checkbox"/> TEM (EPA Level II) <input type="checkbox"/> _____ Miscellaneous Tests <input type="checkbox"/> Total Dust (NIOSH 0500) <input type="checkbox"/> Resp. Dust (NIOSH 0600) <input type="checkbox"/> Silica - FTIR (NIOSH 7602) <input type="checkbox"/> Silica - XRD (NIOSH 7500) <input type="checkbox"/> _____	Asbestos Bulk / Asb ID <input type="checkbox"/> PLM (EPA 600/R-93/116) <input type="checkbox"/> PLM (EPA Point Count) <input type="checkbox"/> PLM (Qualitative only) <input type="checkbox"/> NYELAP 198.1/4/6 <input type="checkbox"/> CAELAP (EPA Interim) <input type="checkbox"/> TEM (Chatfield) <input type="checkbox"/> _____ FOR ASBESTOS AIR: TYPE OF RESPIRATOR USED: _____	Metals - Total Conc. <input checked="" type="checkbox"/> Lead <input type="checkbox"/> RCRA Metals <input type="checkbox"/> _____ <input type="checkbox"/> _____ Metals - Extract <input type="checkbox"/> TCLP / Lead <input type="checkbox"/> TCLP / RCRA Metals <input type="checkbox"/> TCLP / Full (w/ organics) <input type="checkbox"/> _____ Others <input type="checkbox"/> _____

Sample #	Date Sampled	Time Sampled	Sample Identification (e.g. Employee, SSN, Bldg, Material)	Wiped Area (ft ²)	Type ¹ A,B,P,E	Time ²		Flow Rate ³		Total ⁴ Air
						Start	Stop	Start	Stop	
01	9/12/18		Hall Air	18						

¹Type: A=area B=blank P=personal E=excursion ²Beginning/End of Sample Period ³Pump Calibration in Liters/Minute ⁴Volume in Liters [time in min * flow in L/min]

Sampled by NAME <u>Michelle Lussier</u> SIGNATURE <u>[Signature]</u> DATE/TIME <u>9/12/18 3:40</u>	Relinquished to lab by NAME <u>Michelle Lussier</u> SIGNATURE <u>[Signature]</u> DATE/TIME <u>9/12/18 3:41</u>	<input type="checkbox"/> FX <input type="checkbox"/> UPS <input type="checkbox"/> USM <input type="checkbox"/> HD <input type="checkbox"/> DB WB: _____
---	---	--

Sample return requested Ambient temp Ice °C pH Cl R S X

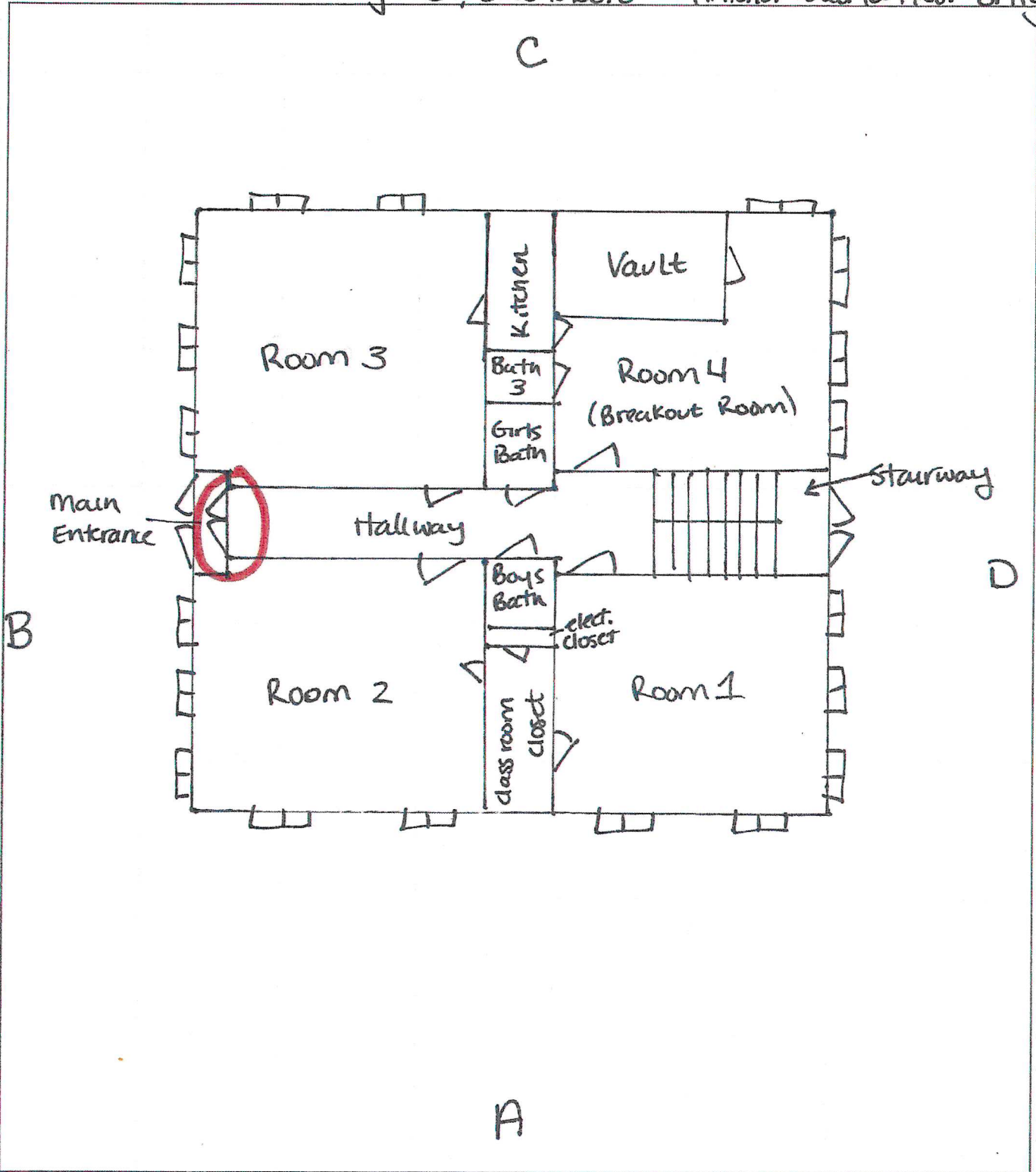
Chain-of-Custody documentation continued internally within lab. Terms and conditions page 2.

Appendix B: Floor Plan Sketch

EverGreen Environmental Health & Safety, Inc.
345 May Farm Road - Barton VT - 05822
802.239.4696 - office 802.673.3369 - cell
www.evergreen-environment.com

JOB LBP-09-082418
SHEET NO. _____ OF _____
CALCULATED BY _____ DATE _____
CHECKED BY _____ DATE _____
SCALE _____

82 Craftsbury Rd, Greensboro (interior second floor only)



Appendix C: Heuresis Pb200i HUD Performance Characteristic Sheet and Calibration

Performance Characteristic Sheet

EFFECTIVE DATE: December 1, 2015

MANUFACTURER AND MODEL:

Make: *Heuresis*
Models: *Model Pb200i*
Source: *⁵⁷Co, 5 mCi (nominal – new source)*

FIELD OPERATION GUIDANCE

OPERATING PARAMETERS:

Action Level mode

XRF CALIBRATION CHECK LIMITS:

0.8 to 1.2 mg/cm ² (inclusive)

SUBSTRATE CORRECTION:

Not applicable

INCONCLUSIVE RANGE OR THRESHOLD:

ACTION LEVEL MODE READING DESCRIPTION	SUBSTRATE	THRESHOLD (mg/cm²)
Results not corrected for substrate bias on any substrate	Brick	1.0
	Concrete	1.0
	Drywall	1.0
	Metal	1.0
	Plaster	1.0
	Wood	1.0

BACKGROUND INFORMATION

EVALUATION DATA SOURCE AND DATE:

This sheet is supplemental information to be used in conjunction with Chapter 7 of the HUD *Guidelines for the Evaluation and Control of Lead-Based Paint Hazards in Housing* ("HUD Guidelines"). Performance parameters shown on this sheet are calculated using test results on building components in the HUD archive. Testing was conducted on 146 test samples in November 2015, with two separate instruments running software version 2.1-2 in Action Level test mode. The actual source strength of each instrument on the day of testing was approximately 2.0 mCi; source ages were approximately one year.

OPERATING PARAMETERS

Performance parameters shown in this sheet are applicable only when properly operating the instrument using the manufacturer's instructions and procedures described in Chapter 7 of the HUD Guidelines.

XRF CALIBRATION CHECK:

The calibration of the XRF instrument should be checked using the paint film nearest 1.0 mg/cm² in the NIST Standard Reference Material (SRM) used (e.g., for NIST SRM 2579, use the 1.02 mg/cm² film).

If the average (rounded to 1 decimal place) of three readings is outside the acceptable calibration check range, follow the manufacturer's instructions to bring the instrument into control before XRF testing proceeds.

SUBSTRATE CORRECTION VALUE COMPUTATION:

Chapter 7 of the HUD Guidelines provides guidance on correcting XRF results for substrate bias. Supplemental guidance for using the paint film nearest 1.0 mg/cm² for substrate correction is provided:

XRF results are corrected for substrate bias by subtracting from each XRF result a correction value determined separately in each house for single-family housing or in each development for multifamily housing, for each substrate. The correction value is an average of XRF readings taken over the NIST SRM paint film nearest to 1.0 mg/cm² at test locations that have been scraped bare of their paint covering. Compute the correction values as follows:

Using the same XRF instrument, take three readings on a bare substrate area covered with the NIST SRM paint film nearest 1 mg/cm². Repeat this procedure by taking three more readings on a second bare substrate area of the same substrate covered with the NIST SRM.

Compute the correction value for each substrate type where XRF readings indicate substrate correction is needed by computing the average of all six readings as shown below.

For each substrate type (the 1.02 mg/cm² NIST SRM is shown in this example; use the actual lead loading of the NIST SRM used for substrate correction):

$$\text{Correction value} = (1\text{st} + 2\text{nd} + 3\text{rd} + 4\text{th} + 5\text{th} + 6\text{th Reading})/6 - 1.02 \text{ mg/cm}^2$$

Repeat this procedure for each substrate requiring substrate correction in the house or housing development.

EVALUATING THE QUALITY OF XRF TESTING:

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.

Multiply the number C by 0.0072. Call this quantity D.

Add the number 0.032 to D. Call this quantity E.

Take the square root of E. Call this quantity F.

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.

Use of this procedure is estimated to produce a spurious result approximately 1% of the time. That is, results of this procedure will call for further examination when no examination is warranted in approximately 1 out of 100 dwelling units tested.

TESTING TIMES:

In the Action Level paint test mode, the instrument takes the longest time to complete readings close to the Federal standard of 1.0 mg/cm². The table below shows the mean and standard deviation of actual reading times by reading level for paint samples during the November 2015 archive testing. The tested instruments reported readings to one decimal place. No significant differences in reading times by substrate were observed. These times apply only to instruments with the same source strength as those tested (2.0 mCi). Instruments with stronger sources will have shorter reading times and those with weaker sources, longer reading times, than those in the table.

Mean and Standard Deviation of Reading Times in Action Level Mode by Reading Level		
Reading (mg/cm²)	Mean Reading Time (seconds)	Standard Deviation (seconds)
< 0.7	3.48	0.47
0.7	7.29	1.92
0.8	13.95	1.78
0.9 – 1.2	15.25	0.66
1.3 – 1.4	6.08	2.50
≥ 1.5	3.32	0.05

CLASSIFICATION OF RESULTS:

XRF results are classified as **positive** if they are **greater than or equal** to the stated threshold for the instrument (1.0 mg/cm²), and *negative* if they are *less than* the threshold.

DOCUMENTATION:

A report titled *Methodology for XRF Performance Characteristic Sheets* (EPA 747-R-95-008) provides an explanation of the statistical methodology used to construct the data in the sheets, and provides empirical results from using the recommended inconclusive ranges or thresholds for specific XRF instruments. The report may be downloaded at <http://www2.epa.gov/lead/methodology-xrf-performance-characteristic-sheets-epa-747-r-95-008-september-1997>.

This XRF Performance Characteristic Sheet (PCS) was developed by QuanTech, Inc., under a contract with the XRF manufacturer.

Calibration Check Test Results

Address/Unit No. 82 Craftsbury Road (second floor)
Greensboro, VT

Device Heuresis Pb200i

Date 9/1/18 XRF Serial No. 1123

Contractor Evergreen Environmental

Inspector Name Michele Lussier #IT880140 Signature *Michele Lussier*

NIST SRM Used 1.02 mg/cm² Calibration Check Tolerance Used ±0.2 mg/cm²

First Calibration Check

NIST SRM			First Average	Difference Between First Average and NIST SRM*
First Reading	Second Reading	Third Reading		
0.9	0.9	1.0	0.93	-0.07

Second Calibration Check

NIST SRM			Second Average	Difference Between Second Average and NIST SRM*
First Reading	Second Reading	Third Reading		
1.0	1.0	0.9	0.96	-0.04

Third Calibration Check (if required)

NIST SRM			Third Average	Difference Between Third Average and NIST SRM*
First Reading	Second Reading	Third Reading		

Fourth Calibration Check (if required)

NIST SRM			Fourth Average	Difference Between Fourth Average and NIST SRM*
First Reading	Second Reading	Third Reading		

* If the difference of the Calibration Check Average from the NIST SRM film value is greater than the specified Calibration Check Tolerance for this device, consult the manufacturer's recommendations to bring the instrument back into control. Retest all testing combinations tested since the last successful Calibration Check test.

Appendix D: Certifications and Licensures

LEAD CONSULTING ENTITY

EVERGREEN ENVIRONMENTAL HEALTH & SAFETY
P.O. BOX 668
STOWE, VT 05672

Vermont Department of Health
Environmental Health
P.O. Box 70 - Drawer 30
Burlington, VT 05402-0070

LICENSE: LC158261

EXPIRES: Friday, November 02, 2018

CERTIFICATE OF LICENSE
VERMONT LEAD REGULATORY PROGRAM

THIS CERTIFICATE SHALL REMAIN IN FORCE UNTIL THE EXPIRATION DATE UNLESS REVOKED
OR VOIDED BEFORE THAT TIME.

THIS CERTIFICATE IS NOT TRANSFERABLE AND IS VALID ONLY FOR THE ABOVE PARTY.

COPY OF THIS CERTIFICATE MUST BE ON SITE AT ALL TIMES.



LEAD INSPECTOR TECHNICIAN I

MICHELLE LUSSIER
P.O. BOX 782
BARTON, VT 05822

Vermont Department of Health
Environmental Health
P.O. Box 70 - Drawer 30
Burlington, VT 05402-0070

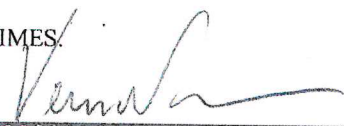
LICENSE: IT886140

EXPIRES: Monday, October 15, 2018

CERTIFICATE OF LICENSE
VERMONT LEAD REGULATORY PROGRAM

THIS CERTIFICATE SHALL REMAIN IN FORCE UNTIL THE EXPIRATION DATE UNLESS REVOKED
OR VOIDED BEFORE THAT TIME. THIS CERTIFICATE IS NOT TRANSFERABLE AND IS VALID ONLY
FOR THE ABOVE PARTY.

COPY OF THIS CERTIFICATE AND PHOTO ID CARD MUST BE ON SITE AT ALL TIMES.

A handwritten signature in black ink, appearing to read "Vanda", is written over the bottom right portion of the certificate text.