Third-Party Lead Clearance Testing Report

Performed On: August 23, 2025, 2:30 PM

Site:
Riley Dual-Language Montessori School (313)
2424 South Fourth Street
Milwaukee, WI 53207

Owner:
Milwaukee Public Schools

Lead Safe Renovator:
JCP Construction – DHS Certification #: 2540270
1849 N MLK Drive, Suite 200
Milwaukee, WI 53212
LSR Supervisor: Jason Delikat – DHS Certification #: LCS-301434

Clearance Testing Performed By:
Devin Gareis, DHS Certification #: LRA-297222
The Sigma Group, Inc.
1300 West Canal Street
Milwaukee, WI 53233
Ph. 414-643-4200
DHS Lead Company Certification #: 17570

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1. LEAD PAINT STABILIZATION / RENOVATION SCOPE OF WORK

As communicated by Milwaukee Public Schools (MPS), interim control/renovation work performed by the lead safe renovation (LSR) contractor was completed in August 2025. The renovation work generally addressed the following:

Paint Hazards

- Windows – Interim controls applied to deteriorated interior casings and sills.
- Walls – Interim controls applied to deteriorated walls.

Dust Hazards

- Windows – Interior sills cleaned throughout the dwelling.
- Floors – Interior floors cleaned throughout the dwelling.

2. VISUAL INSPECTION OF THE INTERIOR

It is Sigma's understanding that, following the completion of renovation activities, the LSR firm completed a visual clearance for quality of work, cleanliness, post cleaning verification color card test in accordance to Wis. Admin. Code § DHS 163.14(11)(L). After passing the visual and verification tests, MPS staff completed enhanced cleaning in accordance with their Lead Dust Cleaning Standard Operating Procedure (SOP). Following the enhanced cleaning by MPS staff, MPS management conducted a quality and cleanliness visual inspection of the school. Upon passing the MPS quality and cleanliness visual inspection of a school, MPS, in coordination with the Milwaukee Health Department (MHD), directed Sigma to perform the visual and dust wipe clearance inspections.

Prior to clearance sample collection, Sigma conducted visual inspections throughout occupied areas including but not limited to DHS 163 and non-DHS 163 spaces (e.g., classrooms, offices, bathrooms, storage rooms, hallways, and other interior school areas) during the resampling event on August 23, 2025.

While limited areas of deteriorated paint (e.g., cracking, flaking, chipping, and/or peeling) were observed; based on information provided by MPS and the LSR SOP, it was understood that the stabilization and cleaning activities of applicable accessible LBP surfaces had been completed prior to clearance. No visible dust, debris, or paint chips were observed on floors or other horizontal surfaces within or adjacent to the areas sampled.

3. VISUAL INSPECTION OF THE EXTERIOR

No exterior visual inspection nor testing was completed by Sigma.

4. LEAD CLEARANCE TESTING SCOPE OF WORK

The third-party dust-wipe clearance protocol was performed at select MPS schools where renovation and repair work were completed in Summer 2025. Sigma personnel were instructed, as relayed verbally by the MHD in a meeting on Tuesday August 12, 2025, to follow the following specified protocol for dust wipe clearance sampling that was developed by MHD and MPS personnel.

Initial Clearance Testing

Sigma was not instructed to conduct initial clearance testing at this school.

Follow-up Clearance Testing – Following Failure of a Clearance Limit on a Building Surfaces
Dust-wipe samples were collected in accordance with Wis. Adm. Code § DHS 163.14(5)(c) and the specifications outlined by MPS and MHD, following Appendix 13.1, *Wipe Sampling of Settled Dust for Lead Determination*, found in the U.S. Department of Housing and Urban Development (HUD) *Guidelines for the Evaluation and Control of Lead-Based Paint Hazards in Housing*, using disposable template guides, pre-moistened wipes, gloves, and documented sample handling and chain-of-custody procedures.

The field collection of settled dust samples using wipe sampling methods is used to determine the presence of lead dust hazards on floors, windowsills, and window troughs in a child-occupied structure. The laboratory results were interpreted according to Wis. Adm. Code § DHS 163.14(5)(c)8 to meet the following clearance standards: less than (<) 10 micrograms per square foot (µg/ft²) on floors, < 100 µg/ft² on windowsills, < 100 µg/ft² in window troughs, and < 40 µg/ft² on exterior porches.

Additional directions for dust-wipe clearance re-sampling were provided on August 20, 2025, by MPS in consultation with MHD and included the following:

- The building surfaces (floor or sill) that failed.
- The same building surfaces in three adjacent or nearby rooms to obtain a total of four samples.

As indicated above, Sigma did not perform the initial dust-wipe clearance sampling event. MPS requested Sigma to conduct the resampling at the locations where the initial clearance limits were exceeded.

The lead wipe samples from the resampling event were analyzed by:

City of Milwaukee Health Department Public Health Laboratory
841 North Broadway, Room 205
Milwaukee, WI 53202
(414) 286-3526
Accreditation ID: 102186

5. SUMMARY OF RESULTS

The re-cleaning verification (resampling) event was conducted on August 23, 2025, to retest previously failed locations, as directed by MPS in consultation with MHD. While Sigma was not provided the detailed analytical results from the initial clearance event conducted by the prior consultant, MPS supplied a map identifying the locations that required resampling. This information was used to guide Sigma's resampling activities.

Based on information communicated by MPS/MHD, resampling was required at two previously failed windowsill locations (Rooms 002A and 007B) and one previously failed floor location (Room 007B). A total of eight dust-wipe samples were collected in accordance with Wisconsin DHS 163 and the specified MPS/MHD protocol:

- **Windowsills (4 samples):** Two samples from previously failed locations (Rooms 002A and 007B) and two from adjacent rooms (Rooms 006 and 008).
- **Floors (4 samples):** One sample from a previously failed location (Room 007B) and three from adjacent rooms (Rooms 002A, 006, and 008).

Laboratory results indicate that each of the three previously failed locations within Rooms 002A and 007B met the clearance requirements of DHS 163.14(5)(c). However, one adjacent windowsill location (Room 006) exceeded the 100 µg/ft² windowsill clearance standard.

Sigma was not instructed to perform additional retesting beyond the August 23, 2025, event. Because Room 006 did not meet the clearance standard, additional cleaning and subsequent clearance testing were recommended prior to occupancy.

The attached **Appendix A** provides a summary of the sample locations, surface types, laboratory detected lead concentrations, regulatory clearance levels, and pass/fail results. Notes regarding units, sampling notation, and applicable DHS 163 regulatory clearance levels are also included. The laboratory results are provided in **Appendix B**. The school floor plan showing sample locations is included in **Appendix C**, and the inspectors' certifications are provided in **Appendix D**.

6. QUALIFICATIONS OF REPORT

The clearance examination and associated sampling described above were conducted in accordance with the requirements of Wis. Admin. Code DHS 163 and applicable MPS/MHD protocols. The findings presented herein represent the condition of tested surfaces only at the time of sample collection and do not guarantee that lead dust hazards will not recur due to future activities, deterioration, or disturbance of lead-based paint or lead-containing materials. This clearance examination was conducted to determine whether lead dust was present on the floors and/or window sills within the areas subject to clearance testing in this child-occupied facility.

Floors and window sills not specifically mentioned in this report were not evaluated. Specifically, Sigma was instructed to not collect dust-wipe samples from:

- Window sills higher than a 6-year old child could reach.
- Stairwells, faculty rooms and bathrooms, and offices.
- Mechanical, electrical, boiler, and storage rooms, data closets, attics, and/or plumbing chases.
- Window troughs.
- Radiators.
- The exterior (including building components and soil).

The results are limited to the areas and components sampled and do not constitute a determination that the entire property is lead-free or that future conditions will remain free of lead dust hazards.

7. MONITORING / MAINTENANCE

New hazards may arise from renovation, deterioration, or other activities; ongoing monitoring and maintenance are recommended. Regular ongoing monitoring, maintenance and visual inspection should be conducted to identify any areas of new deterioration. This may be done by the building owner or a certified risk assessor or hazard investigator. Close attention should be given to areas that received interim control measures, enclosure or encapsulation. New lead hazards may develop over time. Document any new deterioration, rot, and substrate or component failure. These conditions should be corrected promptly using approved lead-safe work practices as part of an ongoing property maintenance program.

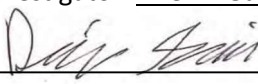
8. DISCLOSURE REQUIREMENT

A copy of this summary must be provided to new lessees (tenants) and purchasers of this property under Federal Law Section 1018 of Title X before they become obligated under a lease or sales contract. The complete report must also be provided to new purchasers and be made available to new tenants. Landlords (lessors) and sellers are also required to distribute an educational pamphlet and include standard warning language in their leases or sales contracts to ensure that parents have the information they need to protect their children from lead-based paint hazards.

9. CERTIFICATION STATEMENT

I certify that this clearance examination was conducted following the dust-wipe sampling methodology outlined in Appendix 13.1 of the U.S. Department of Housing and Urban Development (HUD) *Guidelines for the Evaluation and Control of Lead-Based Paint Hazards in Housing* and the specifications provided by MPS and MHD. Based on visual inspection and laboratory analysis of dust-wipe samples, select areas subject to this clearance examination have not passed in accordance with the clearance values and interpretation criteria specified in Wis. Adm. Code § DHS 163.14(5)(c)8.

Clearance Investigator: Devin Gareis

Signature:  Date: September 5, 2025

APPENDIX A

Lead Dust Wipe Sample Results

LEAD INVESTIGATION DUST WIPE SAMPLE RESULTS
MILWAUKEE PUBLIC SCHOOLS

Lead Renovation Contractor: JCP Construction LLC
Site: 313 - James Whitcomb Riley
Site Address: 2424 S Fourth Street, Milwaukee
Inspection Type: Clearance - Lead Dust Wipe

Sigma Project #: 24270
Sample Date: 8/23/25
Risk Assessors: Devin Gareis & Yilda Torres

Sample No.	Description	Surface Type		Wipe Sample Detected Lead Concentration (ug/ft^2)		DHS Regulatory Clearance Level (ug/ft^2)[a,b,c]
		Floor	Window Sill	8/23/25	Pass/Fail	
007B F	Room 007B Floor	X		<5	Pass	10
007B S	Room 007B Sill		X	90	Pass	100
008F	Room 008 Floor	X		<5	Pass	10
008S	Room 008 Sill		X	38	Pass	100
006F	Room 006 Floor	X		<5	Pass	10
006S	Room 006 Sill		X	**780**	**Fail**	100
002A F	Room 002A Floor	X		<5	Pass	10
002A S	Room 002A Sill		X	62	Pass	100

Notes:

ft^2 = cubic feet ug/ft2 = micrograms per square foot

DHS 163 - Wisconsin Department of Heath Services Ch. 163 Certification for the Identification, removal, and reduction of lead-based paint hazards

a. DHS 163 Regulatory Clearance Levels DHS 163.14(5)(c)8.a. = 10 µg/ft2 on an interior floor.

b. DHS 163 Regulatory Clearance Levels DHS 163.14(5)(c)8.b. = 100 µg/ft2 on an interior windowsill.

c. DHS 163 Regulatory Clearance Levels DHS 163.14(5)(c)8.c. = 100 µg/ft2 on window wells or troughs.

APPENDIX B

Laboratory Analytical Results

City of Milwaukee Health Department
Public Health Laboratory

Frank P. Zeidler Municipal Building
841 North Broadway, Room 205
Milwaukee, WI 53202-3653
Fax: (414) 286-5098
Phone: (414) 286-3526
www.milwaukee.gov/health

Fax Transmission

To:	**Fax Number:**	LEADADMIN@MILWAUKEE.GOV,RPINHAN@MILWAUK
	Company/Person:	LDR
	Location:	MHD LEAD PROGRAM

Date/Time: 08/24/25 05:14 PM CDT **Number of pages:** 4

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CITY OF MILWAUKEE
HEALTH DEPARTMENT

City of Milwaukee-Public Health Laboratories
841 North Broadway, Room 205 Milwaukee, WI 53202-3653
Phone Number: (414)286-3526 Fax Number: (414)286-5098
Autoreporting Lab

Submitter copy to:

HOME ENVIRONMENTAL HEALTH LEAD PROGRAM
841 N Broadway Ave
1st Floor
Milwaukee, WI 53202

Order ID : Z6230009
LRN : 0000325522
Auxiliary ID : 24270Riley
Date Collected: 08/23/25
Date Received : 08/23/25

Requested by: UNKNOWN, DOCTOR

FINAL

Patient Name: **CP/S/4THST, 2424** DOB: Age: Sex:

Ord. Comm: 8 Clearance Dust Wipe

Order Riley

Lead in Dust Wipes

TEST-NAME	RESULT	AB	NRML-RANGE	UNITS	DATE-TIME
COLLECTED 08/23/25 00:00 RECEIVED 08/23/25 16:36					
Sample 1					
Dust Wipe 1	*<5.0			ug/sq.ft.	08/24/25 17:14
Width	*12.00			in.	08/24/25 17:14
Length	*12.00			in.	08/24/25 17:14
Sample 2					
Dust Wipe 2	*90			ug/sq.ft.	08/24/25 17:14
Width	*8.25			in.	08/24/25 17:14
Length	*25.00			in.	08/24/25 17:14
Sample 3					
Dust Wipe 3	*<5.0			ug/sq.ft.	08/24/25 17:14
Width	*12.00			in.	08/24/25 17:14
Length	*12.00			in.	08/24/25 17:14
Sample 4					
Dust Wipe 4	*38			ug/sq.ft.	08/24/25 17:14
Width	*3.50			in.	08/24/25 17:14
Length	*27.25			in.	08/24/25 17:14

Legends: L-Low, H-High, AB-Abnormal, P-Panic, C-Critical, X-Extreme

David Payne, PhD.
Laboratory Director

CITY OF MILWAUKEE
HEALTH DEPARTMENT

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841 North Broadway, Room 205 Milwaukee, WI 53202-3653
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FINAL

Patient Name: **CP/S/4THST, 2424** DOB: Age: Sex:

Ord. Comm: 8 Clearance Dust Wipe

Order Riley

Lead in Dust Wipes

TEST-NAME	RESULT	AB	NRML-RANGE	UNITS	DATE-TIME
Sample 5					
Dust Wipe 5	*<5.0			ug/sq.ft.	08/24/25 17:14
Width	*12.00			in.	08/24/25 17:14
Length	*12.00			in.	08/24/25 17:14
Sample 6					
Dust Wipe 6	*780			ug/sq.ft.	08/24/25 17:14
Width	*4.75			in.	08/24/25 17:14
Length	*27.00			in.	08/24/25 17:14
Sample 7					
Dust Wipe 7	*<5.0			ug/sq.ft.	08/24/25 17:14
Width	*12.00			in.	08/24/25 17:14
Length	*12.00			in.	08/24/25 17:14
Sample 8					
Dust Wipe 8	*62			ug/sq.ft.	08/24/25 17:14
Width	*8.25			in.	08/24/25 17:14
Length	*30.00			in.	08/24/25 17:14

Legends: L-Low, H-High, AB-Abnormal, P-Panic, C-Critical, X-Extreme

David Payne, PhD.
Laboratory Director

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FINAL

Patient Name: **CP/S/4THST, 2424** DOB: Age: Sex:

Ord. Comm: 8 Clearance Dust Wipe

Order Riley

Lead in Dust Wipes

TEST-NAME	RESULT	AB	NRML-RANGE	UNITS	DATE-TIME
Test Method					
Test Method	*see below				08/23/25 23:55

Sample Preparation: Modified ASTM E1644 per PbSOP
Analytical Method: Modified EPA Method 7000B per PbSOP

Minimum Reporting Limit: 5.0 ug/sqft
Minimum Detection Limit: 2.5 ug/sqft

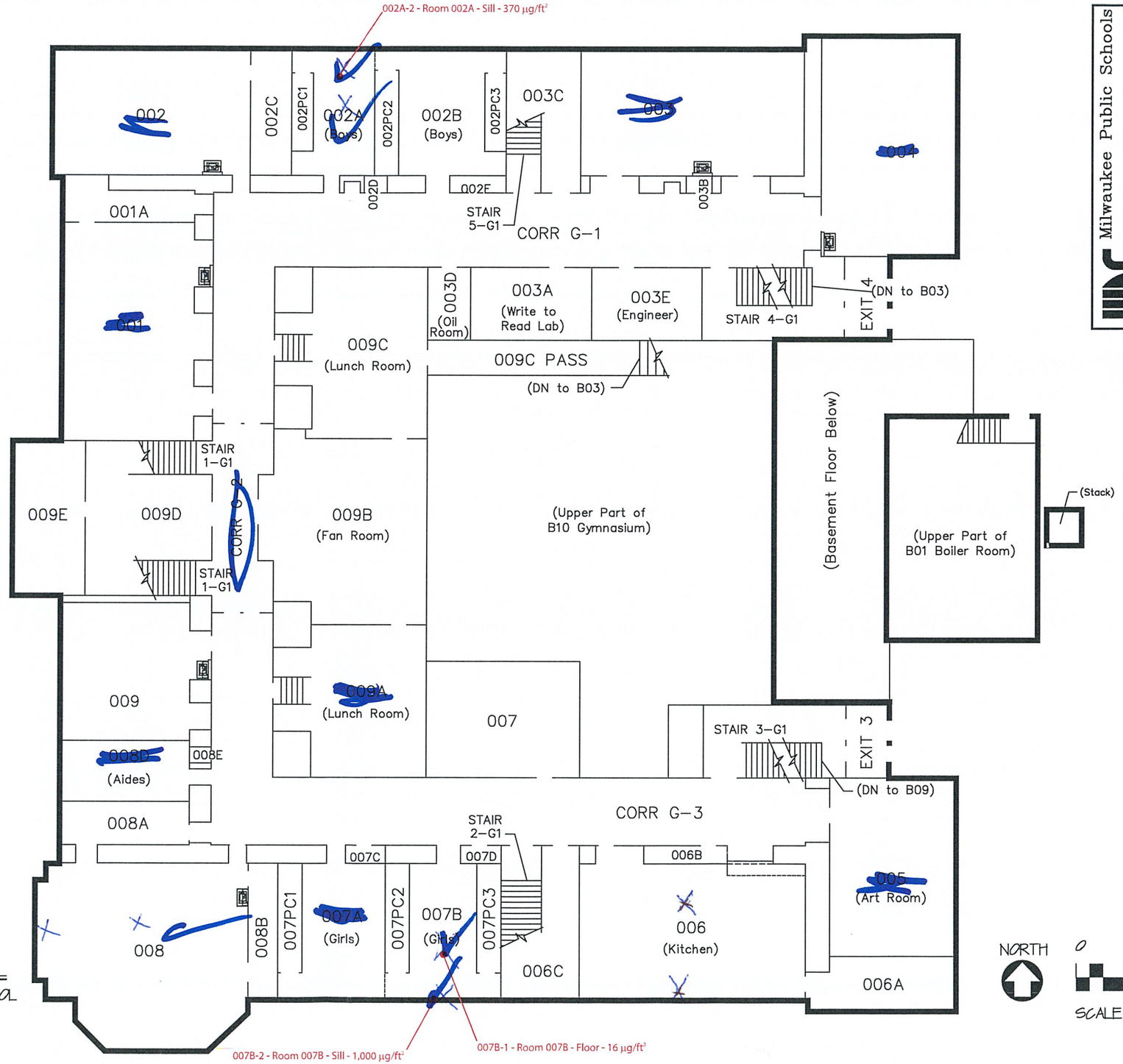
Sample results have not been corrected for field blank or analytical blank. Results related only to those samples tested. All sample area information is provided to the lab by the client unless otherwise stated.
QC results associated with these samples were acceptable unless otherwise noted.
Data reviewed and approved by the QA Coordinator/Technical Manager.
Accrediting body: AIHA-LAP, LLC; Lab ID #102186.

Legends: L-Low, H-High, AB-Abnormal, P-Panic, C-Critical, X-Extreme

David Payne, PhD.
Laboratory Director

APPENDIX C

Floor Plan with All Sample Locations Marked



Milwaukee Public Schools
Division of Facilities and Maintenance Services
1124 North 11th Street
P.O. BOX 0259
Milwaukee, Wisconsin 53205–0259
Phone: 414 283–4600
Fax: 414 286–4662

GROUND FLOOR PLAN

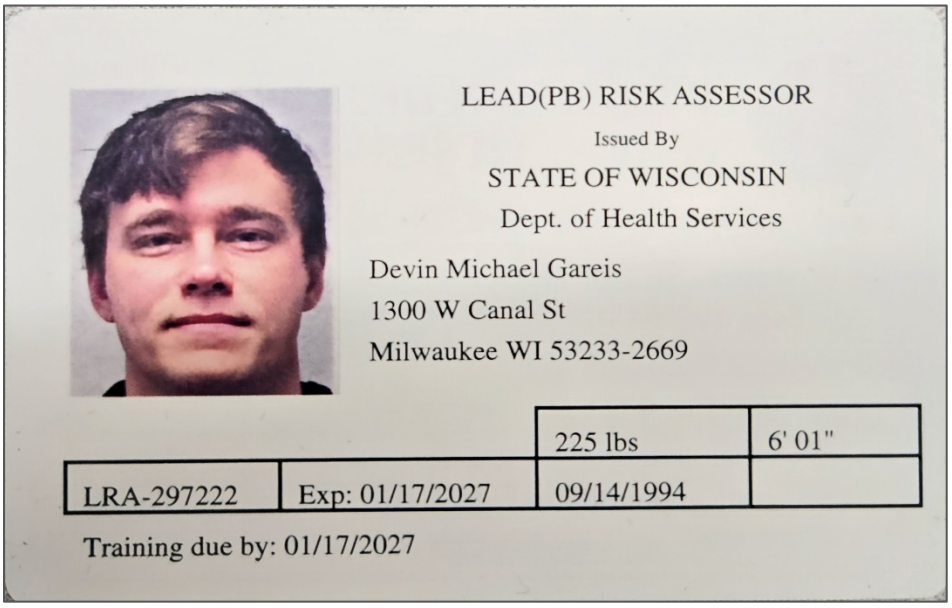
SITE NO: 313 – JAMES WHITCOMB RILEY ELEMENTARY SCHOOL
2424 SOUTH FOURTH STREET, MILW., WI. 53207–1492
DATE: 11/25/19

X=Resample point

APPENDIX D

Inspectors' Certificates

Lead Inspector Certification



LEAD(PB) RISK ASSESSOR

Issued By

STATE OF WISCONSIN

Dept. of Health Services

Devin Michael Gareis

1300 W Canal St

Milwaukee WI 53233-2669

		225 lbs	6' 01"
LRA-297222	Exp: 01/17/2027	09/14/1994	

Training due by: 01/17/2027

Lead Inspector Certification

LEAD(PB) RISK ASSESSOR

Issued By

STATE OF WISCONSIN

Dept. of Health Services

Yilda Beatriz Torres Rodriguez
587 Hartridge Dr
Hartland WI 53029-2659

		lbs	
LRA-301689	Exp: 06/23/2027	07/19/1993	

Training due by: 06/23/2027