

Third-Party Lead Clearance Testing Report

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

Site:

Hartford University School (208)
2227 East Hartford Avenue
Milwaukee, WI 53211

Owner:

Milwaukee Public Schools



Lead Safe Renovator:

JCP Construction– DHS Certification #: 2540270
1849 N Dr Martin Luther King Jr Dr Ste 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 ($\mu\text{g}/\text{ft}^2$) on floors, < 100 $\mu\text{g}/\text{ft}^2$ on windowsills, < 100 $\mu\text{g}/\text{ft}^2$ in window troughs, and < 40 $\mu\text{g}/\text{ft}^2$ 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 within four previously failed floor locations (Corridor G-4 South, Room 008F, Room 003A, and Room 220B). A total of eight dust-wipe samples were collected in accordance with Wisconsin DHS 163 and the specified MPS/MHD protocol: four from the previously failed locations (Corridor G-4 South, Room 008F, Room 003A, and Room 220B), and four adjacent locations (Room 009B, Room 022, Room 024, and Room 028).

Laboratory results indicate that three of the four previously failed locations within Rooms 008F, 220B and Corridor G-4 South met the clearance requirements of DHS 163.14(5)(c). However, the previously failed location within Room 003A exceeded the 10 $\mu\text{g}/\text{ft}^2$ clearance standard.

Sigma was not instructed to perform additional retesting beyond the August 23, 2025, event. Because Room 003A 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

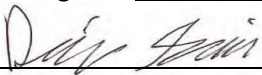
A copy of this summary must be provided to new lessees (tenants) and purchasers of this property under Federal Law Section 1018 of Title X before they become obligated under a lease or sales contract. The complete report must also be provided to new purchasers and be made available to new tenants. Landlords (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 9, 2025

APPENDIX A

Lead Dust Wipe Sample Results

LEAD INVESTIGATION DUST WIPE SAMPLE RESULTS
MILWAUKEE PUBLIC SCHOOLS

Lead Renovation

Contractor: JCP Construction LLC
Site: 208 - Hartford Avenue K-8 School
Site Address: 2227 E Hartford Avenue, Milwaukee
Inspection Type: Clearance - Lead Dust Wipe

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

Sample ID	Description	Surface Type		Wipe Sample Detected Lead Concentration (ug/ft ²)		DHS Regulatory Clearance Level (ug/ft ²) ^{a,b,c}
		Floor	Window Sill	Results	Pass/Fail	
Corr G-4 S	Corridor G-4 South Floor	X		<5	Pass	10
008F F	008F Floor	X		<5	Pass	10
003A F	003A Floor	X		42	Fail	10
009B F	009B Floor	X		5.3	Pass	10
220B F	220B Floor	X		<5.0	Pass	10
024 F	024 Floor	X		<5	Pass	10
028 F	028 Floor	X		<5	Pass	10
022 F	022 Floor	X		<5	Pass	10

Notes:

ft² = cubic feet; ug/ft² = micrograms per square foot

DHS 163 - Wisconsin Department of Health 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 05:15 PM CDT **Number of pages:** 4

CONFIDENTIALITY NOTICE:

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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 : Z6230010

LRN : 0000325523

Auxiliary ID : 24270-Hartford

Date Collected: 08/23/25

Date Received : 08/23/25

Requested by: UNKNOWN, DOCTOR

FINAL

Patient Name: CP/E/HARTFORDAV, 2227

DOB:

Age:

Sex:

Ord. Comm: 8 Clearance Dust Wipe Sample
 Order 24270-Hartford

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 17:15
Width	*12.00			in.	08/24/25 17:15
Length	*12.00			in.	08/24/25 17:15

Sample 2

Dust Wipe 2	*<5.0			ug/sq.ft.	08/24/25 17:15
Width	*12.00			in.	08/24/25 17:15
Length	*12.00			in.	08/24/25 17:15

Sample 3

Dust Wipe 3	*42			ug/sq.ft.	08/24/25 17:15
Width	*12.00			in.	08/24/25 17:15
Length	*12.00			in.	08/24/25 17:15

Sample 4

Dust Wipe 4	*5.3			ug/sq.ft.	08/24/25 17:15
Width	*12.00			in.	08/24/25 17:15
Length	*12.00			in.	08/24/25 17:15

Sample 5

Dust Wipe 5	*<5.0			ug/sq.ft.	08/24/25 17:15
Width	*12.00			in.	08/24/25 17:15

continued on next page

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

David Payne, PhD.
 Laboratory Director

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

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DOB:

Age:

Sex:

Ord. Comm: 8 Clearance Dust Wipe Sample
 Order 24270-Hartford

continued

Lead in Dust Wipes

TEST-NAME	RESULT	AB	NRML-RANGE	UNITS	DATE-TIME
Length	*12.00			in.	08/24/25 17:15
Sample 6					
Dust Wipe 6	*<5.0			ug/sq.ft.	08/24/25 17:15
Width	*12.00			in.	08/24/25 17:15
Length	*12.00			in.	08/24/25 17:15
Sample 7					
Dust Wipe 7	*<5.0			ug/sq.ft.	08/24/25 17:15
Width	*12.00			in.	08/24/25 17:15
Length	*12.00			in.	08/24/25 17:15
Sample 8					
Dust Wipe 8	*<5.0			ug/sq.ft.	08/24/25 17:15
Width	*12.00			in.	08/24/25 17:15
Length	*12.00			in.	08/24/25 17:15

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

David Payne, PhD.
 Laboratory Director

Printed: 08/24/2025 17:15

PAGE: 2 of 3

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

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

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DOB:

Age:

Sex:

Ord. Comm: 8 Clearance Dust Wipe Sample
Order 24270-Hartford

Lead in Dust Wipes

TEST-NAME	RESULT	AB	NRML-RANGE	UNITS	DATE-TIME
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Test Method

Test Method

*see below

08/24/25 00:00

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

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PAGE: 3 of 3

CHAIN OF CUSTODY

BL Project #: _____

Customer Billing Information:	Shipping Information	Turnaround Times (check one, refer to notes *)	Method of Payment
Name: <u>The Sigma Group</u>	☐ Picked up by BATTA ☐ Delivered by customer ☒ Shipped by customer	☒ 6-12 Hours / Rush (*Note 1)	☐ Cash
Billing Address 1: <u>1300 W Canal St</u>		☐ 24 Hours (*Note 2)	☐ Visa/MasterCard/Discover
Billing Address 2: <u>Milwaukee, WI 53233</u>		☐ 48 Hours (*Note 3)	☐ Money Order
Phone: <u>414 643 4200</u>		☐ 72 Hours (*Note 4)	☐ Purchase Order #
Email: <u>Berner bma@Milwaukee.K12.Wi.us</u>		☐ 5 Days (*Note 5)	☐ Check #
Results To: <u>Brian Berner</u>		☐ 10 Days (*Note 6)	☐ Other

* Notes Regarding Turnaround Times (TATs)

Specific TATs depend on the test requested. TATs may not be available for all types of analysis.

- *Note 1: Client must make arrangements with lab to guarantee 6-12 Hour/RUSH TAT - Call (855)-862-2882
 *Note 2: Unless a specific time is requested, results are guaranteed by 5pm on the following business day.
 *Note 3: Unless a specific time is requested, results are guaranteed by 5pm on the 2nd business day.
 *Note 4: Unless a specific time is requested, results are guaranteed by 5pm on the 3rd business day.
 *Note 5: Unless a specific time is requested, results are guaranteed by 5pm on the 5th business day.
 *Note 6: Unless a specific time is requested, results are guaranteed by 5pm on the 10th business day.

Client Project Information

Project Name: <u>Lead Clearance</u>	Project Location: <u>Hartford Ave, Milwaukee</u>	If solid waste, will results be used for disposal in NJ? Yes ☐ No ☐	Project #: <u>24270</u>	Sampled By: <u>Deon Garcia</u> <u>Yilda Torres</u>
		Were the samples collected in New York state? Yes ☐ No ☐		

Sample Information

Lab Use Only	Field Sample ID#	Sample Location & Description	Sampling Date & Time	Sampling Info for Air / Surface Samples				Sample Type	Test Method	Laboratory Use Only		
				Start Time	Stop Time	Flow Rate	Volume/Area			Results	Date of Analysis	Analyst
	<u>Corr G-4 S</u>	<u>Corridor G-4 South Floor</u>		<u>12</u>	<u>12</u>		<u>1</u>					
	<u>008 F</u>	<u>Room 008 Floor</u>		<u>12</u>	<u>12</u>		<u>1</u>					
	<u>003A F</u>	<u>Room 003A Floor</u>		<u>12</u>	<u>12</u>		<u>1</u>					
	<u>004B F</u>	<u>Room 004B Floor</u>		<u>12</u>	<u>12</u>		<u>1</u>					
	<u>220B F</u>	<u>Room 220B Floor</u>		<u>12</u>	<u>12</u>		<u>1</u>					
	<u>024 F</u>	<u>Room 024 Floor</u>		<u>12</u>	<u>12</u>		<u>1</u>					
	<u>028 F</u>	<u>Room 028 Floor</u>		<u>12</u>	<u>12</u>		<u>1</u>					
	<u>022 P</u>	<u>Room 022 Floor</u>		<u>12</u>	<u>12</u>		<u>1</u>					

Special Instructions From Client:

Sample Relinquished By: X

Sample Received By:

Date: Time:

Date: Time:

Laboratory Use Only

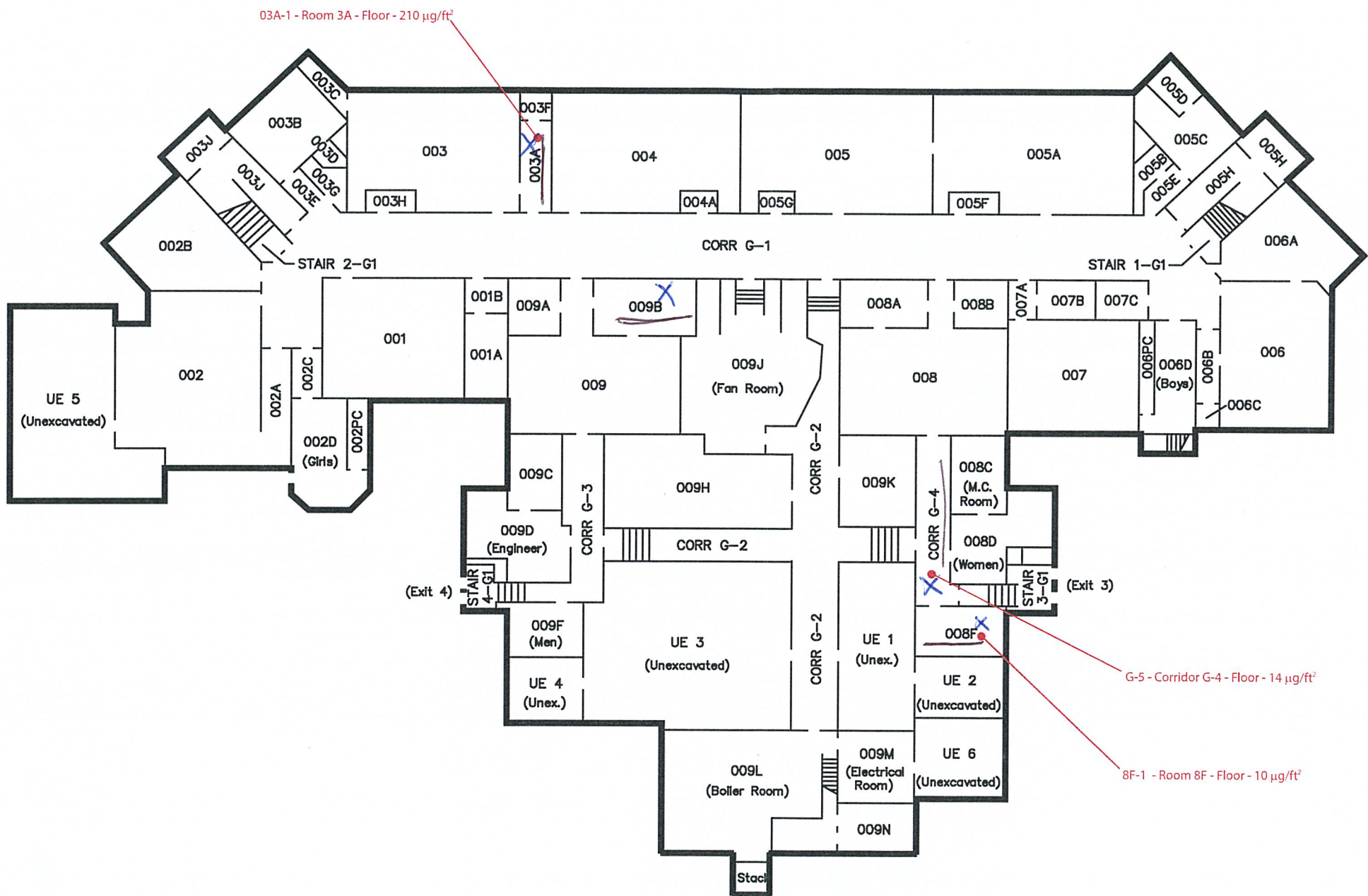
Logged-in by: Log-In Date: Date: Field Samples Acceptable ☐ Yes ☐ No ☐ On Ice
 Sample #: Sample Condition:

For drinking water samples: for results to be valid, lab must receive samples on ice and within 48 hours of collection. For air samples collected by NIOSH 7400 and 7402: in accordance with these NIOSH methods, two field blanks. (or 10% of the number of field samples submitted, whichever is greater) must be submitted and be analyzed with field samples.

For solid waste samples: Before solid waste materials such as soil, ash, sludge, dredge spoils, etc. are disposed in New Jersey, they must undergo analysis following TCLP protocol. BATTA Labs is not responsible for waste disposal misrepresentations on this document. Document Control Item AM5

APPENDIX C

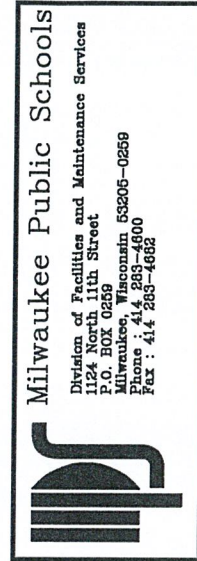
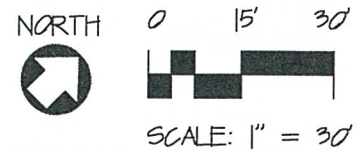
Floor Plan with All Sample Locations Marked

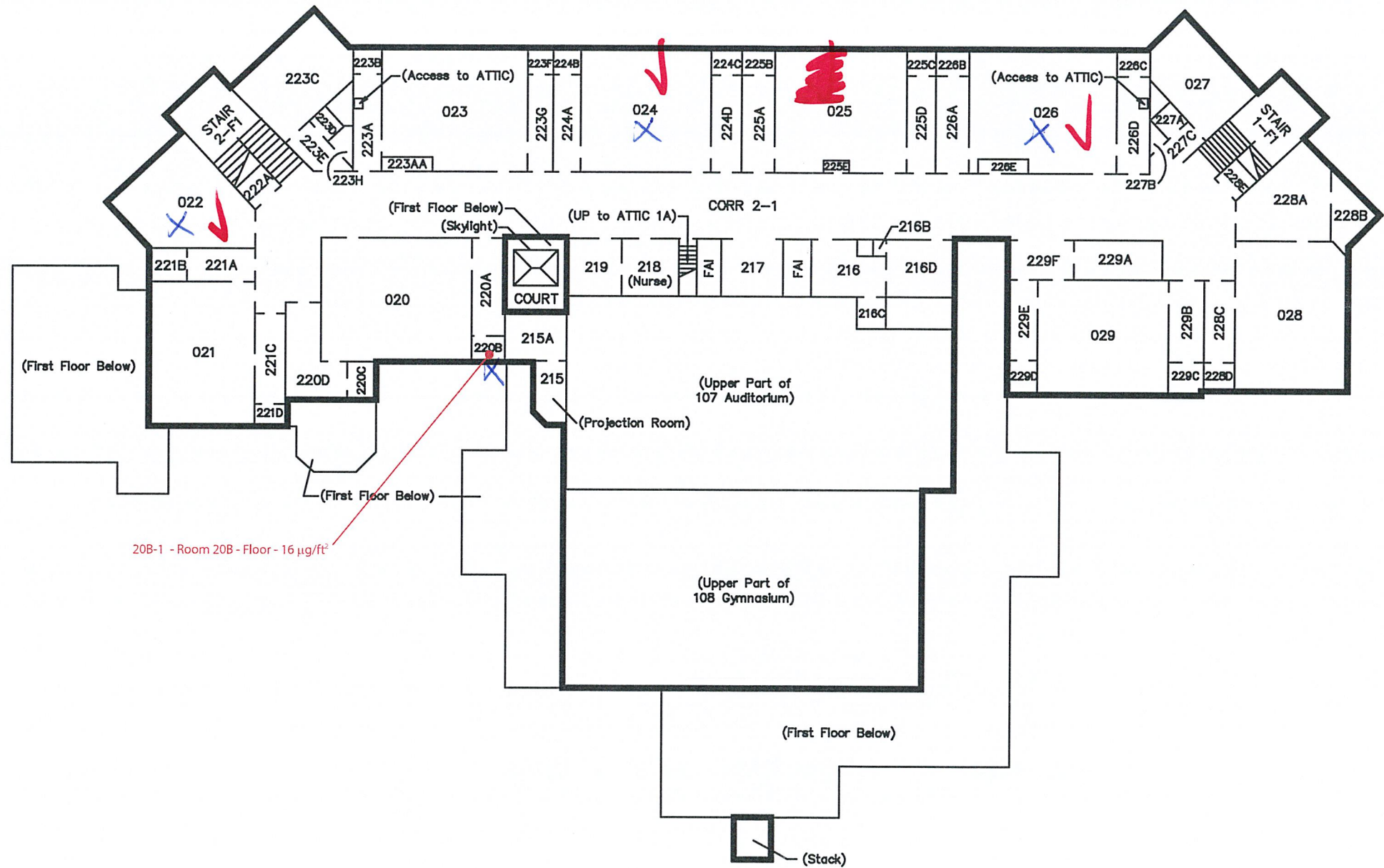


GROUND FLOOR PLAN

SITE NO. 208 - HARTFORD AVENUE K-8 SCHOOL
2227 E. HARTFORD AVE., MILW., WI., 53211
DATE: 8/22/08

X = Resample point

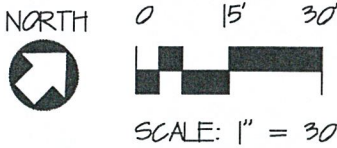




SECOND FLOOR PLAN

SITE NO. 208 - HARTFORD AVENUE K-8 SCHOOL
2227 E. HARTFORD AVE., MILW., WI., 53211
DATE: 8/22/08

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