Limited Lead-Based Paint Investigation and Report

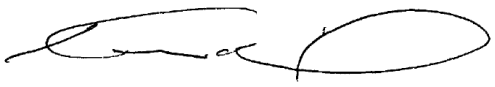
Subject Property:

Ventura High School
2 North Catalina Street, Bldg. #26
Ventura, CA 93003

Report Date: December 27, 2024

Prepared for: Ventura Unified School District
ATTN: Ray Richards, Bond Construction Project Manager
255 W. Stanley Avenue
Ventura, CA 93003
Via Email: Ray.Richards@venturausd.org

Prepared by: Environmental Testing Associates
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Phone: (805) 497-7499



Kevin R. Riley
CA DPH Certified Inspector/Assessor

Proprietary Notice:

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SECTION 1
INTRODUCTION

Environmental Testing Associates, (ETA) performed a limited survey and evaluation of the painted surfaces which may be disturbed during restoration activities at the subject properties. This survey was performed in compliance with California Department of Health services Title 17 CCR Division 1, Chapter 8. This report identifies the locations of "lead-based" paints, "lead-containing" paints and "lead-safe" paints.

The California Department of Public Health Title 17 CCR Division 1, Chapter 8, section 35033 defines lead-based paint as paint or other surface coating that contains an amount of lead equal to or in excess of one milligram per square centimeter (1.0 mg/cm2) or more than one half percent (0.5%) by weight.

Los Angeles County (CA) defines lead-based paint as paint or other surface coating that contains an amount of lead equal to or in excess of 0.7 milligram per square centimeter (0.7 mg/cm2) or more than one half of one percent (0.5%) by weight.

The Cal/OSHA Lead in Construction Standard considers any amount of lead in paint to be of concern during renovation and demolition activities, however Cal/OSHA considers lead content below 0.009% to not produce an exposure concern for workers during renovation/demolition activities (Title 8 CCR 1532.1 – see section 5.0 of this report for further information). Please see attached the general disclosure language for compliance with OSHA regulations.

LEAD-BASED PAINTS

For the purpose of this report, lead-based paint is defined as any paint or surface coating with lead readings equal to or in excess of 1.0 mg/cm^2 or more than 0.5 percent (0.5%) by weight. Disturbance of the paint or surface coating in this category is subjected to the initial employee exposure requirement set forth in Title 8 CCR 1532.1.

LEAD-CONTAINING PAINTS

For the purpose of this report, lead-containing paint (LCP) is defined as any paint or surface coating with lead readings less than 0.1 mg/cm^2 and greater than 0.1 mg/cm^2, and greater than 0.009% and less than 0.5% by weight. Disturbance of the paint or surface coating in this category is also subjected to the initial employee exposure requirement set forth in Title 8 CCR 1532.1.

SECTION 2

DISCUSSION OF HISTORICAL DATA

Historical data regarding lead-content on painted surfaces was not available for review by ETA prior to or during the evaluation.

SECTION 3

CONCLUSION AND RECOMMEDATIONS FOR APPROVED WORK PRACTICES AND AVOIDING DISTURBANCES

In the event that abatement or other disturbance of lead-positive or lead-containing paints is performed, the selected lead abatement contractor is to submit a work plan that will include appropriate detail on how the contractor shall achieve compliance with all applicable local, State and federal requirements for lead work practices prior to beginning lead-related work at the subject property. The "Cal-OSHA Construction Safety Orders, Lead, Section 1532.1 (amended June 19, 2003), Title 8 CCR" shall be complied with when working with building components that have coatings that are classified as "Lead-Positive or "Lead-Containing".

Activities that will disturb lead-positive and lead-containing paints shall be avoided. Appropriate and proper work methods as outlined in local, State, or federal regulation (dust control methods, wet methods, HVAC isolation, proper disposal of waste, etc.) shall be incorporated into the work plan and adhered to at all times, during the project.

The contractor's work plan for the Subject Property shall highlight where lead-positive ceramic tile and lead-containing paints are to be removed. All activities, including stabilization and disturbances to lead-positive and lead-containing materials must be performed by California-DPH Lead Certified Workers with 24-hour Cal-DPH lead worker training.

SECTION 4

ABATEMENT REQUIREMENTS

Building components with lead concentrations exceeding 0.1 mg/cm2 must be segregated for waste characterization sampling/analysis by the contractor prior to disposal per CA Health & Safety Code 25157.8 as well as Title 22 CCR. A summary of OSHA/EPA regulatory requirements for handling and disposal of lead containing paint can be found at www.cdph.ca.gov. The Client should provide a copy of this report and attachments to its demolition contractor. It will be the demolition contractor's sole responsibility to comply with Cal-OSHA Lead in Construction Standards for the protection of his employees during building demolition.

OSHA LEAD REGULATION SUMMARY

The Federal Occupational Safety and Health Administration (OSHA) has enacted a lead standard, which was adopted by Cal/OSHA as 8 CCR 1532.1. The purpose of both standards is to protect construction workers from exposure to lead. OSHA is primarily concerned with activities that disturb paints with *any detectable amounts of lead* (>0.1 mg/cm2, or 600 ppm). Lead was used in most paints until the mid 1950's and was banned in amounts in excess of 0.06% by weight in 1978 for most non-industrial paints by the Consumer Product Safety Commission (CPSC).

These standards require contractors and employers who perform paint removal activities to monitor their employees to determine whether they are being exposed in excess of the action level of 30 micrograms per cubic meter of air ($\mu g/m^3$) over an eight-hour time weighted average (TWA) or the "Permissible Exposure Limit" (PEL) of 50 $\mu g/m^3$ TWA. Monitoring is performed by personal air sampling.

Even when concentrations are below the action level, an employer must provide employees with High Efficiency Particulate Air (HEPA) filtered vacuums, wetting agents, and hand-washing facilities. If the exposure exceeds the action level or the PEL, other procedures such as containing the area, local exhaust ventilation, respiratory and worker protection, worker training, decontamination facilities and medical monitoring are required.

OSHA has identified several work practices that pose varying levels of lead exposure to laborers disturbing lead-containing paint. Estimated exposure levels of lead are founded on the activity itself, rather than the concentrations of lead present in paint. Therefore, as an example, paint that contains 0.5% versus 15% of lead by weight or 0.8 mg/cm^2 versus 3.5 mg/cm^2 of lead in paint could pose the same exposure levels to workers depending on the activities that cause the disturbance and the administrative and engineering controls that are followed.

The following is a summary of work activities that disturb paint and lead-containing materials, along with the expected exposure and associated respiratory protection requirements that result as outlined in the OSHA standards:

Activities	Potential Exposure	Minimum Respiratory Protection
Class I activities include: Manual demolition, manual scraping, manual sanding, heat gun applications, general cleanup, power tool cleaning with dust collection systems and spray-painting activities	50 µg/m^3 to 500 µg/m^3	Half mask air purifying respirator equipped with HEPA filters having a protection factor of 10
Class II activities include: Using lead-containing mortars, lead burning, lead riveting, rivet busting, power tool cleaning without dust collection systems, cleanup of dry expendable abrasives and abrasive blasting.	500 µg/m^3 to 2,500 µg/m^3	Full face powered air purifying respirators equipped with HEPA filters having a protection factor of 100
Class III activities include: Abrasive blasting, welding, cutting, and torch burning on steel structures	Greater than 2,500 µg/m^3	Full face supplied air respirator operated in pressure demand mode or other positive pressure mode (type “C”)

Section 5

GENERAL DISCLOSURE FOR LEAD BASED AND LEAD-CONTAINING PAINTS FOR USE IN SPECIFICATIONS

The Contractor and its subcontractors are required to comply with 29 CFR 1926.62 & Title 8 CCR 1532.1 the Lead in Construction Standards on this project. The regulations require Contractors to protect their employees from exposures in excess of the action level of 30 micrograms per cubic meter (ug/m^3), and the Permissible Exposure Level of 50 ug/m^3 of air. The Federal OSHA standard does not define the amount of lead in paint that constitutes lead containing paint; therefore, the contractor must determine the worker exposure level for any regulated activity disturbing paint containing any amount of lead. The lead sampling results for this structure are contained in Appendix 1 of this report.

Until the worker exposure level is determined, Contractors are required to provide their workers with personal protection including respirators and protective clothing while performing manual demolition, sanding, scraping, abrasive blasting, and burning of paint. If the exposure level indicates that additional worker protection and engineering controls are required for this project, they shall be provided by the Contractor. The owner of the structure shall not be charged additional costs for any additional measures required for the Contractor to comply with the Federal OSHA Lead in Construction Standard.

Prior to the commencement of lead paint disturbance, in accordance with OSHA, Contractor shall prepare a written compliance program for this project that will outline the methods, procedures and controls to be followed by the Contractor and each subcontractor during the disturbance of lead-containing paint. The Contractor's written compliance program shall be submitted to the owner prior to the start of any work covered under the lead standard.

It is the Contractor's responsibility to maintain adequate controls and conduct personal air monitoring to ensure worker safety during the duration of this work. Initial exposure assessment monitoring results shall be supplied to the owner within 48 hours of the collection of the samples.

It is the Contractor's responsibility to test lead-containing paint and debris to determine its disposal requirements. It is the Contractor's responsibility to dispose of all lead-containing waste materials in accordance with applicable hazardous waste disposal regulations.

First a Total Threshold Limit Concentration (TTLC) analysis must be done to determine if the total lead content is >350 PPM in which case the waste must be disposed as California Hazardous Waste per CA Health & Safety Code 25157.8.

If the TTLC analysis result is <50 ppm, the waste can be disposed of as non-hazardous construction debris.

If the TTLC result is between 50 and 350 ppm, a Soluble Threshold Limit Concentration (STLC) analysis may be performed (Regulatory Guidance) to find out how much lead is soluble in the waste. STLC per 22 CCR. If more than 5.0 mg/l (ppm) lead is detected, then the waste must be disposed of as RCRA hazardous waste in California.

If the TTLC result is higher than 350 ppm, then a Toxicity Characteristic Leaching Potential (TCLP) analysis must be performed to determine leachability. If >5.0 mg/l, then the waste is considered RCRA Hazardous waste.

RCRA: Resource Conservation Recovery Act.

How does HSC 25157.8 (from AB 2784, Strom-Martin, 1998), mandating disposal restrictions for waste with greater than 350 ppm lead, affect disposal of lead-painted building debris? Are the wastes with greater than 350-ppm lead now hazardous wastes?

This statute affects all types of wastes, including, but not limited to, those from lead abatement projects, soil from excavations, and demolition debris. According to the statute, wastes with total lead greater than 350 ppm disposed of in California must be disposed of at a Class 1 hazardous waste landfill, or at other landfills that have specific permits to accept these wastes. However, the wastes are not classed as hazardous wastes unless for another reason. The California hazardous waste threshold for total lead is 1,000 ppm and the soluble threshold concentration (STLC) for lead is 5 ppm. If the total and soluble lead levels are below these threshold concentrations, it is not a hazardous waste in California. Therefore, you do not need to use a hazardous waste manifest or registered hazardous waste transporter when transporting the waste if the only hazard is that it contains lead at greater than 350 ppm but less than 1,000 ppm (mg/kg).

SECTION 6

CONFIDENTIALITY AND LIMITATIONS

The information in this report or portions of this report may be required to be included in notifications to contractors or other visitors to the residence. The Client or his agents shall not use this report as a work plan for any of the work suggested or recommended in the report.

This report is based upon conditions and practices observed at the property and information made available to ETA. This report does not propose to identify all hazards or unsafe practices, or to indicate that other hazards or unsafe practices do not exist at the premises.

ETA shall not be responsible for identifying LBPs located behind walls and/or columns, beneath flooring, under carpeting, above solid ceilings, underground or any other inaccessible areas.

SECTION 7
SUMMARY OF LEAD
Lead in Paint Chips by Flame AAS (SW 846 3050B*/7000B)

LEAD-BASED PAINTS

For the purpose of this report, lead-based paint is defined as any paint or surface coating with lead readings equal to or in excess of 0.7 mg/cm^2 or more than 0.5 percent (0.5%) by weight. Disturbance of the paint or surface coating in this category is subjected to the initial employee exposure requirement set forth in Title 8 CCR 1532.1.

L-2: Interior Walls	**1.500% wt.**
L-4: Exterior Frames	**3.600% wt.**
L-5: Exterior Deck	**3.400% wt.**

LEAD-CONTAINING PAINTS

For the purpose of this report, lead-containing paint (LCP) is defined as any paint or surface coating with lead readings less than 0.7 mg/cm^2 and greater than 0.1 mg/cm^2, and greater than 0.009% and less than 0.5% by weight. Disturbance of the paint or surface coating in this category is also subjected to the initial employee exposure requirement set forth in Title 8 CCR 1532.1.

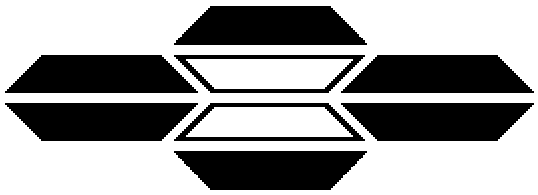
L-1: Exterior Stucco	**0.009% wt.**
L-3: Interior Window Frame	**0.010% wt.**

LEAD SAFE PAINTS:

Lead-safe paint is defined as paint or surface coating with lead levels <.009. (<0900 ppm)

APPENDIX A

LABORATORY RESULTS



ASBESTOS TEM LABORATORIES, INC.

ATEM SOP-AA-01
(EPA 3050B/EPA 7420)

Lead Paint Analysis Report

Laboratory Job # 397269

3431 Ettie St.
Oakland, CA 94608
(510) 704-8930
FAX (510) 704-8429

Dec/26/2024

Kevin Riley
Environmental Testing Associates
850 Hampshire Road, Suite G
Westlake Village, CA 91361

RE: LABORATORY JOB # 397269
Atomic Absorption Spectroscopy analytical results for 5 paint sample(s).
Job Site: Ventura High School-2 North Catalina Street, Ventura, CA 930
Job No.:

Enclosed please find results for the atomic absorption spectroscopy (AA) metals analysis of one or more paint samples. Sample preparation and analysis procedures were performed according to ATEM SOP-AA-01 (EPA 3050B / EPA 7420).

Prior to analysis, samples are checked for damage and disruption of the chain-of-custody seal. Samples are then logged-in, each given a unique laboratory number, and a hard copy containing all pertinent information is generated. This, and all other relevant paper work are kept with each sample throughout the analytical procedures to assure proper analysis.

A portion of each sample is weighed out such that an aliquot of ~0.2 grams is obtained. The weighed sample material is then placed into a digestion vessel, transferred to a fume hood, heated at ~95 Deg. C, refluxed with nitric acid to solubilize the contained metals, and treated with hydrogen peroxide to oxidize any organic binder present in the sample material. High purity water is added to make a 50 ml volume for each sample.

AA analysis is performed on a microprocessor controlled Perkin Elmer AAnalyst 300 atomic absorption spectrophotometer, operating in the flame mode. Samples are diluted as needed to allow reading of concentrations in the calibration range. QC analyses are prepared and performed along with each sample batch to ensure accurate analytical determinations. Data is compiled into a standard report format and subjected to a thorough quality assurance check before the information is released to the client.

Sincerely Yours,

Laboratory Manager
ASBESTOS TEM LABORATORIES, INC.

Note: Results for routine quality control samples run in parallel to the samples reported here were within acceptable limits.

Additional Note: Wherever possible, Asbestos TEM Laboratories highly recommends the submission of field blanks with each sample set. It is recommended to analyze field blanks collected in parallel to all samples collected in the field as a check against media contamination from the manufacturer or in the field. Sample results are not corrected for contamination based on the field blank(s) or other analytical blank(s).

Disclaimer - These results relate only to the samples tested as received and must not be reproduced, except in full, with the approval of the laboratory. Incorrect or illegible information supplied by the customer may adversely affect the validity of test results. This report must not be used to claim product endorsement by AIHA or any other agency of the U.S. Government.

ATOMIC ABSORPTION SPECTROSCOPY
LEAD PAINT ANALYSIS REPORT
ATEM SOP-AA-01 (EPA 3050B / EPA 7000B)

Contact: Kevin Riley
Address: Environmental Testing Associates
850 Hampshire Road, Suite G
Westlake Village, CA 91361

Samples Submitted: 5
Samples Analyzed: 5
Job Site / No.
Ventura High School-2 North Catalina

Report No.: **397269**
Date Submitted: Dec-26-24
Date Reported: Dec-26-24

SAMPLE ID	METAL	SAMPLE RESULT	REPORTING LIMIT	LOCATION / DESCRIPTION
L-1 Lab ID # 96-08549-001	Pb	**91 mg/kg** 0.009 %	**36 mg/kg** 0.004 %	Ext Stucco Sampling Date: Dec-23-24 Analysis Date: Dec-26-24 Analyzed Weight (g): 0.276
L-2 Lab ID # 96-08549-002	Pb	**15000 mg/kg** 1.500 %	**39 mg/kg** 0.004 %	Int Walls Sampling Date: Dec-23-24 Analysis Date: Dec-26-24 Analyzed Weight (g): 0.254
L-3 Lab ID # 96-08549-003	Pb	**100 mg/kg** 0.010 %	**40 mg/kg** 0.004 %	Int Window Frame Sampling Date: Dec-23-24 Analysis Date: Dec-26-24 Analyzed Weight (g): 0.2485
L-4 Lab ID # 96-08549-004	Pb	**36000 mg/kg** 3.600 %	**40 mg/kg** 0.004 %	Ext Frames Sampling Date: Dec-23-24 Analysis Date: Dec-26-24 Analyzed Weight (g): 0.2513
L-5 Lab ID # 96-08549-005	Pb	**34000 mg/kg** 3.400 %	**45 mg/kg** 0.005 %	Ext Door Sampling Date: Dec-23-24 Analysis Date: Dec-26-24 Analyzed Weight (g): 0.222
Lab ID #				Sampling Date Analysis Date Analyzed Weight (g)
Lab ID #				Sampling Date Analysis Date Analyzed Weight (g)
Lab ID #				Sampling Date Analysis Date Analyzed Weight (g)
Lab ID #				Sampling Date Analysis Date Analyzed Weight (g)
Lab ID #				Sampling Date Analysis Date Analyzed Weight (g)

Analytical results posted above relate only to the material(s) tested. The sample has not been blank corrected.

µg - micrograms **1% = 10,000 ppm** **1ppm = 1 mg/Kg**

Lab QC Reviewer R. Mark Bailey

Analyst Jo Ann Huerto

Bldg 26

ATEM LABORATORIES CHAIN OF CUSTODY

CALIFORNIA: 3431 Ettie Street Oakland, CA 94608 Phone (510) 704-8930 Fax (510) 704-8429
NEVADA: 1350 Freeport Blvd. #104, Sparks, NV 89431 Phone (775) 359-3377 Fax (775) 359-2798
You may also email this chain of custody to asbestosteniabs.ca@gmail.com **** denotes required field***

Company: Environmental Testing Associates	*Contact:** Kevin Riley	*Phone:** (805) 497-7499	*Email:** kriley@etatesting.com
*Address:** 850 Hampshire Road, Suite G	*City:** Westlake Village, CA	*State:** *Zip:* 91361	*Email:* jweber@etatesting.com
*Job Site:** Ventura High School-2 North Catalina Street, Ventura, CA 93001	*Job #:*	*PO #:*	*Email:* ahamel@etatesting.com

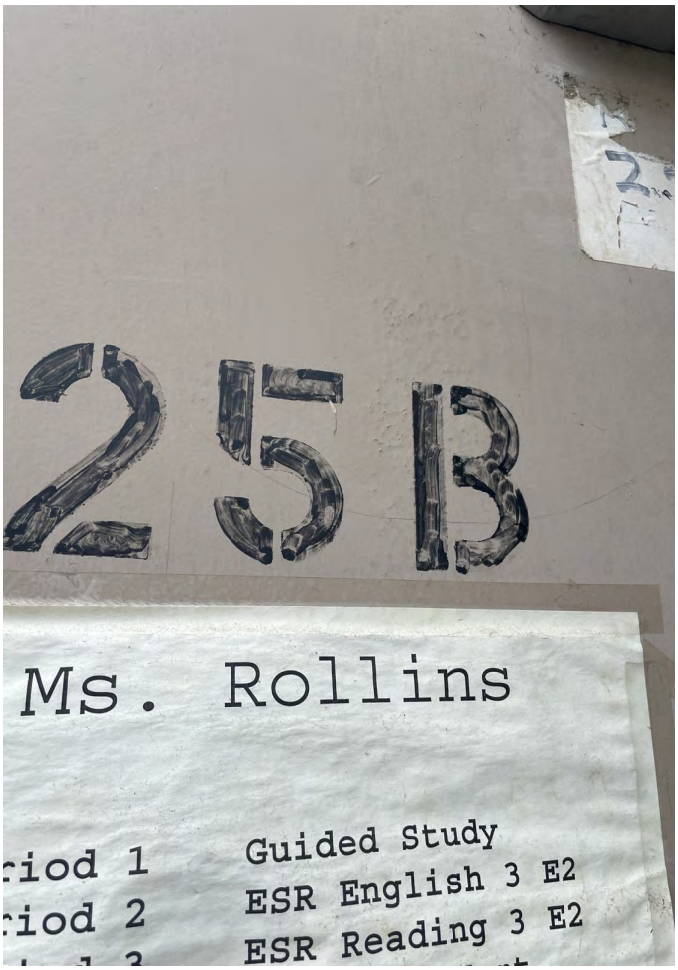
Reporting *	■ Email	□ Phone	□ Fax	□ Mail	□ Pickup	**Billing**	■ Email	□ Fax	□ Mail	□ Pre-Paid		*Billing Email :*
Results Due:*	□ 2 HR	□ 4 HR	■ 6 HR	□ 8 HR	□ 24 HR	□ 48 HR	□ 3 DAY	□ 5 DAY	□ 10 DAY	□ Hold Samples (Until _____)		□ ***After Hours:**_____***
Asbestos Air	□ PCM NIOSH 7400 □ A □ B	□ TEM AHERA	□ TEM CARB Mod. AHERA	□ TEM EPA Yamate Level II	□ TEM NIOSH 7402	□ ISO 10312	□ ISO 13794	□ Sensitivity _____				
Asbestos Bulk	□ PLM Standard (EPA 600/R-93-1)	□ PLM 400 Point Count	□ PLM 1000 PC	□ PLM 400 PC Gravimetric Reduction	□ PLM 1000 PC Grav. Red.	□ TEM EPA Qualitative	□ TEM EPA Quantitative					
Asbestos Soils	□ CARB 435 Prep Only	CARB 435 PLM □ 400 PC □ 800 PC □ 1000 PC □ 1200 PC	□ EPA Soil Screening Qualitative	□ TEM-NOA EPA/CARB Quantitative	□ Erionite							
Asbestos Dust	□ ASTM D-5755 Fiber Count	□ ASTM D-5756 Wt. %	□ ASTM D-5756 Mass	□ ASTM D-6480 Dust Wipe	□ Total Particulates (Gravimetric)							
Asbestos Water	□ 100.2 Potable Drinking Water	□ 100.1 Non Potable Water	***note that 100.2 will be used for all water samples unless otherwise requested***									
Lead/Silica	■ Lead Paint Chips EPA-SW-846 7000B	□ Lead Dust Wipe EPA-SW-846 7000B	□ Lead Air NIOSH 7082	□ Lead Soil EPA-SW-846 7000B	Crystalline Silica Air (NIOSH 7500) □ Single Species □ All Species	Crystalline Silica in Bulk (NIOSH 7500) □ Single Species □ All Species	Respirable Crystalline Silica in Bulk (NIOSH 7500) □ Single Species □ All Species					
Custom/Other	□ **Custom Analysis ****	□ TEM Chatfield (Semi-Quant)	□ NIOSH 0500	□ NIOSH 0600	□ TTLC	□ STLC	□ TCLP					
Special Instruct.	□ Composite	□ Prep Only	□ 8 Hour TWA	Other **								

Sample # *	Sample Type	Date Collected	Time On	Time Off	Total Time (min)	Flow Rate (lpm) On	Flow Rate (lpm) Off	Flow Rate (lpm) Average	Volume or Area Sampled	Hold Sample	Description *
L-1	BULK	122324								□	EXT STUCCO
L2	↓	↓								□	INT WALLS
L3										□	INT. WINDOW FRAME
L4										□	EXT FRAMES
L5										□	EXT DUST
										□	
										□	
										□	
										□	
										□	
										□	

MTZ

Submitted By *	**Received By**
Date/Time Submitted *	**Date/Time Received**
Submitted By	**Received By**
Date/Time Submitted	**Date/Time Received**

*** For any special instructions, RUSH results or Custom Analysis, you must clarify these specifications AND, of more importance, contact us here at ATEM ahead of time to manage scheduling to meet your requests.* ***This includes dropping off samples for rush, same day analysis.*** *Drop off and processing of samples after hours cannot be accommodated without proper notification from you, and confirmation by ATEM staff. All samples will be held for 3 months from the date of receipt at ATEM. Additional sample storage time may be obtained through ATEM Customer Service.*


25B
Ms. Rollins
riod 1 Guided Study
riod 2 ESR English 3 E2
ESR Reading 3 E2






FIRE
Strobe Light & Alarm
















26B
Welcome!


26B
Welcome!


26B
Welcome!





California Department of PublicHealth

STATE OF CALIFORNIA
DEPARTMENT OF PUBLIC HEALTH

LEAD-RELATED CONSTRUCTION CERTIFICATE

INDIVIDUAL:	CERTIFICATE TYPE:	NUMBER:	EXPIRATION DATE:
	Lead Inspector/Assessor	LRC-00008459	3/25/2025

Kevin Riley

Disclaimer: This document alone should not be relied upon to confirm certification status. Compare the individual's photo and name to another valid form of government issued photo identification. Verify the individual's certification status by searching for Lead-Related Construction Professionals at www.cdph.ca.gov/programs/clppb or calling (800) 597-LEAD