Limited Lead-Based Paint Investigation and Report

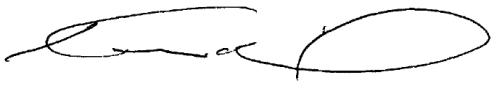
Subject Property:

Ventura High School c/o VUSD
2 North Catalina Street, (Quonset Hut)
Ventura, CA 93001

Report Date: March 17, 2025

Prepared for: Ventura Unified School District
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Kevin R. Riley
CA DPH Certified Inspector/Assessor

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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.

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 LW Paint	**0.23% wt.**
L-2: Exterior Roof Paint	**0.089% wt.**
L-3: Metal- Beige Paint	**0.075% wt.**
L-4: Block Wall-Green	**0.39% wt.**

LEAD SAFE PAINTS:

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

APPENDIX A

LABORATORY RESULTS

LA Testing
5431 Industrial Drive, Huntington Beach, CA 92649
Phone/Fax: (714) 828-4999 / (714) 828-4944
http://www.LATesting.com hblab@latesting.com

LA Testing Order: 332507511
CustomerID: 32ETAS62
CustomerPO:
ProjectID:

Attn: **Kevin Riley**

Environmental Testing Associates
850 Hampshire Rd
Suite G

Phone: (805) 497-7499
Fax: (805) 497-7477
Received: 3/14/2025 12:15 PM
Collected: 3/12/2025

Project: **VENTURA HIGH SCHOOL S/O VENTURA UNIFIED SCHOOL DISTRICT - 2 NORTH CATALINA STREET, (QUONSET HUT), VENTURA, CA**

Test Report: Lead in Paint Chips by Flame AAS (SW 846 3050B/7000B)*

Client SampleDescription	*Collected*	*Analyzed*	*Weight*	*RDL*	*Lead Concentration*
L-1	3/12/2025	3/14/2025	0.259 g	0.0064 % wt	0.23 % wt
332507511-0001	Site: EXT LW PAINT				
L-2	3/12/2025	3/14/2025	0.296 g	0.0064 % wt	0.089 % wt
332507511-0002	Site: EXT ROOF PAINT				
L-3	3/12/2025	3/14/2025	0.2532 g	0.0064 % wt	0.075 % wt
332507511-0003	Site: METAL - BEIGE PAINT				
L-4	3/12/2025	3/14/2025	0.1712 g	0.0093 % wt	0.39 % wt
332507511-0004	Site: BLOCK WALL GREEN				

Michael Chapman, Laboratory Manager
or other approved signatory

LA Testing maintains liability limited to cost of analysis. Interpretation and use of test results are the responsibility of the client. This report relates only to the samples reported above, and may not be reproduced, except in full, without written approval by LA Testing. LA Testing bears no responsibility for sample collection activities or analytical method limitations. The report reflects the samples as received. Results are generated from the field sampling data (sampling volumes and areas, locations, etc.) provided by the client on the Chain of Custody. Samples are within quality control criteria and met method specifications unless otherwise noted.
Analysis following Lead in Paint by LA Testing SOP/Determination of Environmental Lead by FLAA. Reporting limit is 0.008% wt based on the minimum sample weight per our SOP. "<" (less than) result signifies the analyte was not detected at or above the reporting limit. Measurement of uncertainty is available upon request. Definitions of modifications are available upon request.
Samples analyzed by LA Testing Huntington Beach, CA AIHA LAP, LLC-ELLAP Accredited #101650, CA ELAP 1406

Initial report from 03/14/2025 18:06:57

#332507511

Environmental Testing Associates

CHAIN OF CUSTODY

L.A. TESTING
520 Mission Street, South Pasadena, CA
Phone: 800.303.0047 Fax: 323.254.9982

850 Hampshire Road Suite G, Westlake Village, CA 91361 Phone: 805.497.7499 Fax: 805.497.7477

Project Name: Ventura High School c/o Ventura Unified School District Sampled by/Inspector: Kevin Riley Date: 03/12/2025

Project Address: 2 North Catalina Street, (Quonset Hut), Ventura, CA 93001

Client Name: Ray Richards, VUSD Contact # (805) 342-6464

Email: KRiley@etatesting.com, JWeber@etatesting.com, AHamel@etatesting.com

Sample #	Sample Description	Type	Volume	Code	Comments	H/T
L-1	EXT LW PAINT	G	2K	FAAS	PAINT	
L-2	EXT ROOF PAINT	G	3K	FAAS	PAINT	
L-3	METAL - BEIGE PAINT	G	2K	FAAS	PAINT	
L-4	BLOCK WALL GREEN	G	2K	FAAS	PAINT	

Relinquished by: _____ DATE: 3-13-25 TIME: 2 ☐Sent Via FedEx ☒Hand Delivered to Lab
Kevin Riley CAC-17-5871

Received by: Daniela Winslow (WI) _____ DATE: 3/13/25 TIME: 1:45
Name (please print) Signature

Rec: Rocio Ochoa RO (C) 3/14/25 12:15

Requested Analysis Circle one: 6 Hour

Page 1 of 1

Rel.: Ray Garza 3/14/25

Page 1 Of 1

OrderID: 332507511

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