Lead Based Paint Risk Assessment Report
For Quarters 28 located at
VA Medical Center
1898 Fort Road
Sheridan Wyoming 82801

Prepared For:
Mr. Kurt Mayer, Chief Facility Management Service
VA Medical Center
1898 Fort Road
Sheridan Wyoming 82801

By:
Thomas R. Homan, Certified Risk Assessor
VA Medical Center
1898 Fort Road
Sheridan Wyoming 82801

WY-05-112005-973

July 25, 2003

July 25, 2003

To: Mr. Kurt Mayer, Chief FMS

Subject: Lead Based Paint Inspection/Risk Assessment
Quarters 28
VA Medical Center
1898 Fort Road
Sheridan Wy. 82801

A lead-based paint inspection/risk assessment was conducted on Quarters 28, VA Medical Center 1898 Fort Road, Sheridan WY, by Thomas R. Homan, a Certified Risk Assessor (WY –05-112005-973) inspector accreditations and qualifications are presented as Attachment A .

The Inspection was performed using the protocol presented in *Guidelines for the Evaluation and Control of Lead-Based Paint Hazards in Housing*, and *40 CFR Part 745: Identification of Dangerous Levels of Lead, Final Rule.*

Lead-based paint is defined as surface coatings with a lead concentration of 1.0 mg/cm² or 0.5 percent by weight (Title X and 40 CFR Part 745.) Lead based paint is of concern both as a source of direct exposure through ingestion of paint chips and as a contributor to lead in interior dust and exterior soil. Regulatory agencies, which have addressed lead-based paint, include the U.S. Environmental Protection Agency (EPA), U.S. Department of Housing and Urban Development (HUD), U.S. Occupational Safety and Health Administration (OSHA), and the U.S. Consumer Products Safety Commission (CPSC.)

The inspection/risk assessment included documenting types of exterior painted building components, substrate material and general paint colors. Typical interior/exterior building components included columns, trim, window and doorframes, casings, stair railing, doors, baseboards and shelving. The painted building components were described based on specific component type and substrate material. The color of each component was also documented.

Quarters 28 is a two story brick building with attic. The painted exterior portions of the building were inspected and found to be in very poor condition with cracked, peeling and chipping paint. The interior surfaces were in good condition with the only signs of chipping and peeling paint noted in the window troughs.

The inspection/risk assessment included a visual inspection of all surface areas, wipe samples for lead dust, and readings taken with an Niton XL300 X-Ray Fluorescence Analyzer which automatically calculates measurable amounts of lead in paint by correcting for substrate conditions. An *XRF Performance Characteristic Sheet* for the XRF specifies the ranges where XRF results are positive, negative, or inconclusive. The PCS for this instrument is presented as Attachment B. The XRF readings obtained during inspection are presented as Attachment C.

XRF testing indicated that lead-based paint is present on interior and exterior components of the building. See XRF test results.

All painted surfaces in which any detectable level of lead is present must be considered as having the potential to present exposure to lead-based paint hazards to residents. Every effort should be made to minimize dust generated when painted surfaces are sanded or scraped. Cutting or burning of painted surfaces should be limited to the greatest extent possible to minimize the generation of lead fumes.

Areas of the building where paint will be disturbed should be isolated by sealing openings such as doors and windows with plastic sheeting during the renovation/demolition process to prevent escape of potentially lead-containing dust. Ventilation units equipped with High Efficiency Particulate Air (HEPA) filters should be located in the work area and operated continuously during the project. The filters on the ventilation units should be inspected regularly to ensure that they are operating properly.

Any contractor preparing to bid or perform work either outside or inside the building should be informed of the presence of lead in the building and of compliance requirements under current OSHA regulations relating to lead exposures in the construction industry. Contractors should submit a detailed plan addressing worker training, worker exposure monitoring, and personal protective equipment (PPE) to be utilized during the work. The plan should also address engineering and administrative controls to be implemented to control the generation of dust during the renovation/demolition process and action criteria for work stoppage, PPE upgrades, and work method alternatives. Contractors should also be informed of cleanup and clearance criteria.

This report has been prepared to provide information concerning lead-based paint, which may be present in this structure. It includes only materials visible and accessible at the time of the inspection.

Note: No soil samples were taken as there was no exposed dirt around the structure.

Hazard Control Measures

Interim Controls: Are designed to temporarily reduce human exposure or possible exposure to lead-based paint hazards. These measures include specialized cleaning, repairs, maintenance, painting, temporary containment, and educational programs for management and residents. Interim controls also include all preparation, cleanup, disposal, and post abatement clearance testing associated with such measures.
Interim control measures include:
Paint film stabilization
Friction and impact reduction treatments
Dust removal

Abatement: Designed to permanently eliminate lead-based paint hazards. These measures include the removal of lead-based paint and lead contaminated dust, the permanent enclosure or encapsulation of lead-based paint, the replacement of lead-painted surfaces and fixtures and the removal or permanent covering of lead contaminated soil. Abatement also includes all preparation, cleanup, disposal, and post-abatement clearance testing activities associated with such measures.
Abatement measures include:
Building component replacement
Enclosure
Paint removal by heat gun, chemical, or contained abrasive
Encapsulation (with patch test and a 20 year warranty
Permanent soil covering (paving, sod) and
Soil removal and replacement

Although interim measures are much more cost effective, they do require that an on-going monitoring program be established. Some areas could be encapsulated with vinyl siding/wrapping, such as the window frames, soffits.

Thomas R. Homan
Safety Specialist

Attachment A- Inspector Credentials and Certification
Attachment B- XRF Performance Characteristic Sheet
Attachment C- XRF Results
Attachment D- References

Attachment A

Inspector Credentials and Certification

United States Environmental Protection Agency

This is to certify that:

Thomas R Homan

has fulfilled the requirements of the Toxic Substance Control Act (TSCA) Section 402(a)(1), and has received certification as an individual, pursuant to 40 CFR Part 745.226 to conduct lead-based paint activities for the following:

Discipline: Risk Assessor

Jurisdiction: State of Wyoming excluding Indian Tribes

This certification is valid from the date of issuance and expires November 6, 2005

Certification # WY-05-112005-973 Issued on: November 7, 2002

Sadie Hoskie, Director
Pollution Prevention, Pesticides, and Toxics Program

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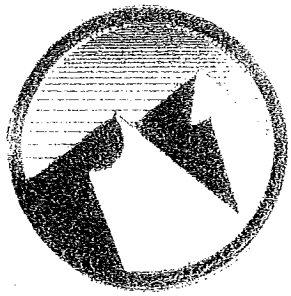

Tom Homan

VA Medical Center 1898 Fort Road Sheridan WY 82801

HAS COMPLETED A COURSE ENTITLED

Lead Inspector/Risk Assessor Training

AND PASSED AN EXAMINATION

DATE: April 8, 2002 - April 12, 2002
EXAM DATE: April 10 & April 12, 2002
INTERIM EXPIRATION: October 12, 2002
COURSE EXPIRATION: April 12, 2005
CREDIT(S): 3.65 CEUs / 5.0 ABIH CM points
NUMBER:

Dean R. Lillquist, Ph.D., MSPH, CIH
Training Manager

Attachment B

XRF Performance Characteristic Sheet

Performance Characteristic Sheet

EFFECTIVE DATE: April 17, 1998 **EDITION NO.: 4**

MANUFACTURER AND MODEL :
Make: *Niton Corporation*
Models: *XL-309, 701-A, 702-A, and 703-A Spectrum Analyzers*
Source: ^{109}Cd (10 - 40 mCi initial source strength)
Note: This Performance Characteristic Sheet (PCS) is applicable to the listed Niton XRF instruments which have an operating software version of 5.1 (or equivalent) using a variable-time mode, and to Niton instruments having an operating software version of 1.2C (or equivalent) using a fixed-time mode. This sheet supersedes all previous sheets for the XRF instruments made by the Niton Corporation and the 1993 testing of XL prototypes reported in the document titled: *A Field Test of Lead-Based Paint Testing Technologies: Technical Report* (EPA Report No. 747-R-95-002b, May 1995).

FIELD OPERATION GUIDANCE

This PCS provides supplemental information to be used in conjunction with Chapter 7 (Lead-Based Paint Inspection) of the HUD *Guidelines for the Evaluation and Control of Lead-Based Paint Hazards in Housing* ("HUD Guidelines"). Performance parameters shown in this sheet are applicable only when operating the instrument using the manufacturer's instructions and the procedures described in Chapter 7 of the HUD Guidelines.

OPERATING PARAMETERS:

Use of variable-time paint test mode ("K & L + Spectra" mode) on instruments running software version 5.1 (or equivalent) using the "Combined Lead Reading" with the instrument's display of a 95%--confident (2-sigma) *Positive* or *Negative* determination versus the action-level as the stopping point of the measurement.

Use of nominal 20-second readings for L-shell results or 120-second readings for K-shell results on instruments running software version 1.2C (or equivalent) in a fixed-time mode.

XRF CALIBRATION CHECK LIMITS:

0.9 to 1.2 mg/cm^2 (inclusive) for instruments running software version 5.1 (or equivalent)
0.9 to 1.1 mg/cm^2 (inclusive) for instruments running software version 1.2C (or equivalent)

SUBSTRATE CORRECTION :
(applicable to instruments running software versions 5.1 (or equivalent) or 1.2C (or equivalent))

For XRF results below 4.0 mg/cm^2, substrate correction recommended for:

None.

Substrate correction is not recommended for:

Brick, Concrete, Drywall, Metal, Plaster, and Wood

stopping point of the measurement. For instruments running software version 1.2C (or equivalent) in the fixed-time mode, use either 20-second readings for the L-shell results or 120-second readings for the K-shell results, as described in the "Classifications of Results" section below.

Conduct XRF re-testing at the ten testing combinations selected for re-testing.

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 multifamily 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 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 results.

Compute the average of all ten retest XRF results.

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.

BIAS AND PRECISION:

Bias and precision data were not computed for instruments using software version 5.1 and taking variable mode readings. (See Appendix B, Section B.3.2 of the document titled *Methodology for XRF Performance Characteristic Sheets*, EPA-747-R-45-008, September 1997). During the 1997 testing, there were 12 testing locations with laboratory-measured lead levels equal to or greater than 4.0 mg/cm^2 lead which were tested using two instruments in the variable-time paint test mode. None of these testing locations had XRF readings less than 1.0 mg/cm^2. These data are for illustrative purposes only. Substrate correction is not recommended for this XRF instrument.

The bias and precision data given below are for instruments running software version 1.2C (or equivalent) and were computed without substrate correction using the 20-second L-shell readings from samples with

the corresponding L-shell and K-shell X-ray fluorescence (refer to Chapter 7 of the HUD Guidelines for more details). The L-shell readings (or L-readings) are displayed as a numerical result alone, or as a numerical result preceded by either one greater-than symbol (">") or preceded by two greater-than symbols (">>"). The two greater-than symbols will only be displayed when the detected lead level is greater than 5.0 mg/cm^2. Since the maximum lead level reported by this instrument is 5.0 mg/cm^2, lead levels greater than 5.0 mg/cm^2 are displayed as ">>5.0". Other examples of how L-readings can be displayed (in mg/cm^2 units) are "0.6" and ">0.9". The numerical display alone implies that the instrument measured the lead in the paint at the displayed level using L-shell X-ray fluorescence; 0.6 mg/cm^2 in the example. A number preceded by a single greater-than symbol indicates that the measurable lead is deeply buried in the paint and the detected lead level is greater than the displayed value. In the example, >0.9 indicates that the instrument detected lead deeply buried in paint at a level greater than 0.9 mg/cm^2. K-shell readings (or K-readings) are displayed in one of two ways: 1) as a single K-reading plus and minus a "precision" value or 2) as an upper K-reading and lower K-reading.

The same method is used for testing in single-family and multifamily housing. The HUD Guidelines recommend taking a single XRF reading on a testing combination. (A testing combination is a location on a painted surface as defined in Chapter 7 of the HUD Guidelines.) For testing combinations involving up to four walls in a room, each wall is classified on its individual XRF reading. (See Chapter 7 for testing procedures if there are more than four walls in a room, and for testing exterior walls.)

A. Take a single 20-second nominal reading on each testing combination.

B. Classify the L-reading based on the type of information displayed.

   <u>If two greater-than symbols are displayed then</u>:

   - Classify the >>5.0 L-reading as POSITIVE

   <u>If one greater-than symbol is displayed then</u>:

   - Classify the L-reading as POSITIVE if the numerical result that follows the greater than symbol is equal to or greater than 1.0.

   - Classify the L-reading as INCONCLUSIVE if the numerical result that follows the greater than symbol is less than 1.0.

   <u>If the numerical L-reading is displayed alone (that is, without any preceding greater-than symbols), then</u>:

   - Classify the L-reading as POSITIVE if the numerical result is equal to or greater than 1.0.

   - Classify the L-reading as NEGATIVE if the numerical result is less than 1.0.

C. Resolution of results classified as inconclusive.

   All results classified as inconclusive above require further investigation. Take a 120-second nominal XRF reading and use the K-shell reading. In multifamily housing, resolve the inconclusive classification with a single K-shell reading or laboratory analysis as described below.

   - Classify the result as POSITIVE if either the K-reading minus the displayed precision value <u>or</u> the lower K-reading is equal to or greater than 1.0.

   - Classify the result as NEGATIVE if either the K-reading plus the displayed precision value <u>or</u> the upper K-reading is less than 1.0.

   - Classify the result as INCONCLUSIVE if neither of the above decision rules using the K-reading provided a classification which can occur when the upper K-reading is equal to or greater than 1.0 or the lower K-reading is less than 1.0.

Attachment C

Summary of XRF Results

Serial #XL309-U3911NR4562 Site: Qtrs28 Date: 7/25/2003

No	XLNo	Flr	Side	Room	Strc	Sub	Feat	Clr	Ssec	Date/Time	Result	Pbl ± Prec	Pbk ± Prec
1	1			Shutter Cal 1					40.3	7/25/2003 10:27:59	...	NA	NA
2	2			Calibrate					21.9	7/25/2003 10:28:16	POS	1.17 ± 0.14	1.24 ± 0.51
3	3			Calibrate					2.7	7/25/2003 10:29:04	POS	3.53 ± 0.95	5.18 ± 3.34
4	4			Calibrate					7.0	7/25/2003 10:29:17	POS	1.70 ± 0.32	1.46 ± 1.10
5	5			Calibrate					3.2	7/25/2003 10:29:37	NEG	0.05 ± 0.42	-0.02 ± 1.38
6	6			Calibrate					5.3	7/25/2003 10:29:51	NEG	0.36 ± 0.13	-0.15 ± 1.25
7	7			Porch 0	Porch	Wood	Columns	White	3.1	7/25/2003 10:31:29	POS	>>5.0	47.26 ± 7.55
8	8			Porch 0	Porch	Wood	Columns	White	3.1	7/25/2003 10:31:45	POS	>>5.0	44.72 ± 7.58
9	9			Outside 0	Door	Wood	Columns	White	2.9	7/25/2003 10:32:14	POS	>>5.0	21.67 ± 7.32
10	10			Porch 0	Porch	Metal	Rail cap	White	2.7	7/25/2003 10:33:01	POS	>>5.0	4.64 ± 4.13
11	11			Porch 0	Porch	Wood	Floor	Grey	13.6	7/25/2003 10:33:37	NEG	0.67 ± 0.22	0.40 ± 0.79
12	12			Porch 0	Window	Wood	Casing	White	2.6	7/25/2003 10:34:31	POS	>>5.0	40.29 ± 10.68
13	13	1	A	Room 1	Wall	Plaster		Beige	10.0	7/25/2003 10:35:50	NEG	0.34 ± 0.27	-0.57 ± 0.99
14	14	1	A	Room 1	Door	Plaster	Casing	White	3.1	7/25/2003 10:36:22	POS	>>5.0	12.13 ± 3.56
15	15	1	A	Room 1	Door	Wood	Door	White	3.1	7/25/2003 10:36:52	POS	>>5.0	9.06 ± 3.14
16	16	1	A	Room 1	Wall	Wood	Baseboard	White	3.1	7/25/2003 10:37:11	POS	>>5.0	7.62 ± 2.81
17	17	1	A	Room 1	Window	Wood	Casing	White	3.1	7/25/2003 10:37:28	POS	>>5.0	8.29 ± 2.75
18	18	1	A	Room 1	Window	Wood	Apron	White	3.2	7/25/2003 10:37:43	POS	4.19 ± 2.72	10.37 ± 2.90
19	19	1	A	Room 1	Stairs	Wood	Baseboard Ins	White	5.2	7/25/2003 10:38:13	POS	>>5.0	6.54 ± 2.00
20	20	1	A	Room 1	Stairs	Wood	Baluster	White	3.0	7/25/2003 10:38:36	POS	>>5.0	13.00 ± 5.39
21	21	1	A	Room 1	Stairs	Wood		White	5.3	7/25/2003 10:39:10	POS	>>5.0	5.51 ± 1.81
22	22	1	C	Room 2	Wall	Plaster		Other	14.6	7/25/2003 10:40:25	NEG	0.17 ± 0.18	0.02 ± 0.74
23	23	1	C	Room 2	Door	Wood	Casing	White	9.7	7/25/2003 10:41:05	NEG	0.21 ± 0.42	0.44 ± 0.88
24	24			Calibrate					21.9	7/25/2003 10:41:45	POS	1.08 ± 0.09	0.93 ± 0.51
25	25			Calibrate					9.1	7/25/2003 10:42:33	POS	1.53 ± 0.25	2.00 ± 0.83
26	26			Calibrate					9.9	7/25/2003 10:42:56	NEG	0.15 ± 0.24	0.02 ± 0.77
27	27			Kitchen C	Window	Wood	Casing	White	5.2	7/25/2003 10:43:50	NEG	0.11 ± 0.34	-0.39 ± 1.10
28	28			Kitchen C	Window	Wood	Apron	White	3.1	7/25/2003 10:44:11	NEG	0.07 ± 0.43	-1.29 ± 1.55
29	29			Kitchen C	Window	Wood	Sash	White	7.4	7/25/2003 10:44:30	NEG	0.11 ± 0.33	-0.81 ± 1.01
30	30		D	Kitchen C	Window	Wood	Casing	White	3.2	7/25/2003 10:44:54	POS	2.00 ± 1.78	13.05 ± 3.72
31	31		D	Kitchen C	Window	Wood	Apron	White	3.2	7/25/2003 10:45:09	POS	1.65 ± 1.39	13.47 ± 3.60
32	32		D	Kitchen C	Window	Wood	Sash	White	3.1	7/25/2003 10:45:25	POS	3.84 ± 2.25	11.43 ± 3.10
33	33		A	Kitchen C	Door	Wood	Casing	White	3.2	7/25/2003 10:45:44	POS	2.40 ± 2.10	17.37 ± 3.82
34	34		A	Kitchen C	Door	Wood	Door	White	3.1	7/25/2003 10:46:01	POS	>>5.0	13.09 ± 3.77
35	35		D	Kitchen C	Cabinet	Wood	Door Out	White	3.1	7/25/2003 10:46:38	NEG	0.00 ± 0.01	-1.67 ± 1.36
36	36		D	Kitchen C	Cabinet	Wood	Door Out	White	3.1	7/25/2003 10:46:52	NEG	0.00 ± 0.08	-1.16 ± 1.29
37	37		B	Kitchen C	Window	Wood	Casing	White	3.2	7/25/2003 10:47:31	POS	1.96 ± 1.67	6.73 ± 2.36
38	38	0	A	Kitchen C	Window	Wood	Casing	White	10.1	7/25/2003 10:49:19	NEG	0.01 ± 0.03	-0.55 ± 1.03
39	39	0	B	Kitchen C	Cabinet	Wood	Door Out	White	3.2	7/25/2003 10:50:21	NEG	0.04 ± 0.24	-0.31 ± 1.19
40	40	0	B	Kitchen C	Stairs	Wood	Tread	Grey	3.0	7/25/2003 10:51:14	NEG	0.09 ± 0.23	1.06 ± 1.69
41	41	2	A	Room 1 C	Window	Wood	Casing	White	3.1	7/25/2003 10:53:33	POS	>>5.0	8.03 ± 2.86
42	42	2	A	Room 1 C	Window	Wood	Apron	White	3.1	7/25/2003 10:53:49	POS	4.00 ± 2.54	12.79 ± 3.64
43	43	2	A	Room 1 C	Window	Wood	Casing	White	3.1	7/25/2003 10:54:08	POS	>>5.0	6.97 ± 2.69
44	44	2	A	Room 1 C	Window	Wood	Apron	White	3.1	7/25/2003 10:54:33	POS	>>5.0	10.97 ± 3.55
45	45	2	A	Room 1 C	Wall	Wood	Baseboard	White	3.1	7/25/2003 10:54:53	POS	>>5.0	8.23 ± 2.98
46	46	2	A	Room 1 C	Wall	Plaster		Pink	23.7	7/25/2003 10:55:21	NEG	0.09 ± 0.15	0.48 ± 0.55
47	47	2	D	Room 1 C	Door	Wood	Casing	White	3.1	7/25/2003 10:56:30	POS	>>5.0	17.31 ± 3.85
48	48	2	D	Room 1 C	Door	Wood	Door	White	3.1	7/25/2003 10:56:44	POS	>>5.0	15.56 ± 3.58
49	49	2	D	Bath C	Wall	Plaster		White	14.4	7/25/2003 10:57:15	NEG	0.14 ± 0.13	0.10 ± 0.71
50	50	2	D	Bath C	Wall	Wood	Baseboard	White	7.6	7/25/2003 10:58:02	NEG	0.16 ± 0.25	0.62 ± 0.80
51	51	2	D	Bath C	Door	Wood	Casing	White	3.1	7/25/2003 10:58:28	POS	2.68 ± 3.41	10.89 ± 3.04
52	52	2	D	Bath C	Cabinet	Wood	Door Out	White	3.1	7/25/2003 10:59:07	POS	2.41 ± 3.69	7.88 ± 2.85
53	53	2	C	Bath C	Window	Wood	Casing	White	7.6	7/25/2003 10:59:28	NEG	0.12 ± 0.44	0.79 ± 0.88
54	54	2	C	Bath C	Window	Wood	Sash	White	3.0	7/25/2003 10:59:53	NEG	0.00 ± 0.12	1.44 ± 1.30
55	55	2	A	Bath C	Door	Wood	Door	White	3.1	7/25/2003 11:00:12	POS	>>5.0	15.40 ± 4.23
56	56	2	D	Room 2 C	Door	Wood	Door	White	3.0	7/25/2003 11:00:57	POS	>>5.0	13.01 ± 3.69
57	57	2	D	Room 2 C	Door	Wood	Casing	White	3.1	7/25/2003 11:01:11	POS	>>5.0	15.37 ± 4.06
58	58	2	C	Room 2 C	Wall	Plaster		Yellow	21.4	7/25/2003 11:01:36	NEG	0.22 ± 0.16	0.17 ± 0.56
59	59	2	A	Bath 2 C	Wall	Plaster		White	14.3	7/25/2003 11:02:54	NEG	0.23 ± 0.25	-0.11 ± 0.77
60	60	2	A	Bath 2 C	Wall	Wood	Baseboard	White	7.5	7/25/2003 11:03:32	NEG	0.04 ± 0.20	0.82 ± 0.86
61	61	2	A	Bath 2 C	Door	Wood	Casing	White	5.4	7/25/2003 11:03:59	POS	1.42 ± 1.11	4.90 ± 1.73
62	62	2	A	Bath 2 C	Door	Wood	Door	White	9.8	7/25/2003 11:04:17	NEG	0.15 ± 0.27	-0.21 ± 0.69
63	63			Calibrate					21.9	7/25/2003 11:05:24	POS	1.13 ± 0.13	0.89 ± 0.51
64	64			Calibrate					9.1	7/25/2003 11:06:11	POS	1.54 ± 0.25	1.99 ± 0.87
65	65			Calibrate					6.6	7/25/2003 11:06:35	POS	3.72 ± 0.62	4.63 ± 1.29
66	66			Calibrate					5.3	7/25/2003 11:06:57	NEG	0.33 ± 0.10	-0.06 ± 1.22

Attachment D

References

References

Housing and Community Development Act, Residential Lead-Based Paint Hazard Reduction Act, Title X, 1992

Housing and Urban Development (HUD), Guidelines for the Control of Lead-Based Paint Hazards in Housing, June 1995, revised 1997 and 2000.

Code of Federal Regulations (CFR), Title 40, Part 745, Lead; Requirements for lead Based Paint Activities in Target Housing and Child Occupied Facilities; Final Rule, August 29, 1996, Revised January 5, 2001