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03/26/22

Dewberry c/o NCORR  
1545 Peachtree Street NE, Suite 250  
Atlanta, Georgia 30309

Re: Lead Risk Assessment  
228 US HWY 17 N, Windsor, NC 28438  
EI Project No: IHMO210289.00

**Project Site Address:** 228 US HWY 17 N, Windsor, NC 28438

**NCORR APP ID:** APP-03009, INSP-0009629

**Inspection Date:** 02/21/2022

**Scope of Work:** Lead Risk Assessment

**Lead-Based Paint Inspection:** Lead-Based Paint Found

**Deteriorated Lead-Based Paint:** Yes

**Lead Containing Materials:** Yes

**Lead Dust Hazards:** Yes

**Lead Soil Hazards:** None Found

**Recommendations:** Recommendations for lead-based paint hazards: see Table 6

**Inspector:** Chris Ciappina, North Carolina Risk Assessor #120303

Larry Rockefeller, CIH, CSP  
Director, Industrial Hygiene Services

Tom Majkowski, NC Risk Assessor #120166  
Director, Quality Control

## 1. Findings:

Table 1: Lead-Based Paint <sup>1</sup>					
Room	Side	Component <sup>2</sup>	Substrate	Condition	Color
Bathroom 2	B	Tub	Ceramic	Intact	White

Note(s):

1. Positive results indicate lead in quantities equal to or greater than 1.0 mg/cm<sup>2</sup> and are considered lead-based paint.
2. Samples are taken to represent component types; therefore, it should be assumed that similar component types in the rest of that room or room equivalent also contain lead-based paint.

Table 2: Deteriorated Lead-Based Paint <sup>1</sup>					
Room	Side	Component <sup>2</sup>	Substrate	Condition	Color
None Found	N/A	N/A	N/A	N/A	N/A

Note(s):

1. Surfaces in deteriorated condition are considered to be lead-based paint hazards as defined by Title X and should be addressed through abatement or interim controls which are described in Table 6.

Table 3: Lead Containing Materials <sup>2</sup>					
Room	Side	Component <sup>2</sup>	Substrate	Condition	Color
Bathroom 2	B	Tub	Ceramic	Intact	White

Note(s):

2. Although not considered to be lead-based paint, these materials when disturbed through destructive measures such as sanding, chipping, grinding, and other sources of friction, can create dust hazards and should be treated through control described in Table 6.

Table 4: Dust Wipe Sample Analysis

Sample #	Location	Surface Type	Concentration (ug/ft <sup>2</sup> )	Lead Hazard <sup>1</sup>
DW1	Kitchen	Windowsill	<20.0	No
DW2	Kitchen	Floor	<5.00	No
DW3	Bathroom	Windowsill	63.7	Yes
DW4	Bathroom	Floor	<5.00	No
DW5	Bathroom	Windowsill	<20.0	No
DW6	Bathroom	Floor	<5.00	No
DW7	Bedroom	Windowsill	30.7	Yes
DW8	Bedroom	Floor	<5.00	No
DW9	Q/C	Blank Wipe	<5.00 µg/wipe	No

Note(s):

1. EPA Lead Dust Hazard for Floors: 10 µg/ft<sup>2</sup>

Table 5: Soil Sample Analysis

Sample #	Location	Bare/Covered	Concentration (mg/kg)	Lead Hazard <sup>1</sup>
S-1	Sample	Bare	<9.38	No

Note(s):

1. EPA Lead in Soil Hazard for children's play areas with bare residential soil: 400 mg/Kg; bare soil for the remainder of the yard: 1,200 mg/Kg
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Table 6: Lead Hazard Control Options <sup>1</sup>			
Hazard Type	Location	Description	Control <sup>2-5</sup>
Lead Dust Hazard	Bathroom, Bedroom	Windowsill	Cleaning- Clean surfaces using HEPA filtered vacuum and wet cleaning agents to remove leaded dust
Deteriorated Lead Based Paint			Abatement, Enclosure, Encapsulation or Paint Film Stabilization

Note(s):

1. Lead hazard control options include abatement and interim controls.
2. Paint film stabilization: Wet scrape and prime building components where chipping or peeling is present following acceptable methods.
3. Replace: Remove and dispose of components in accordance with applicable federal, state and local regulations. Prime coat any new unpainted wood components.
4. Enclosure: Enclose lead-based paint coated building components with a material that is structurally affixed and deemed to last 20 years.
5. General Cleaning-Clean using HEPA filtered vacuum and wet wipe impacted surfaces to remove paint chips and lead-dust hazards.

## 2. Limitations:

- No limitations were encountered during the course of this survey
- Exterior windows were inaccessible due to storm window coverings
- No soil was observed along the dripline, therefore no soil sample was collected

## 3. Lead Hazard Control Activities:

All lead abatement activities must be performed in strict compliance with the Department of Housing and Urban Development (HUD) 24 CFR Part 35, and the Environmental Protection Agency (EPA) 40 CFR Part 745 Subpart L.

All contractor's personnel who will disturb lead-based paint during the course of their work on this residence should be informed of the potential danger posed by lead-based paint and should be directed to comply with all applicable federal, state, and local lead abatement regulations.

Table 6 lists each lead hazard identified, along with control options. Highest priority should be given to correcting lead hazards with greater probability of being contacted by children six years of age and under, women who are or may become pregnant, and residents of the home. These include, but are not limited to, deteriorated lead-based paint inside the residence on friction and impact surfaces (windows and doors), other surfaces (i.e. walls or trims) at a height of six feet and below, lead dust hazards, deteriorated lead-based paint on exterior friction and impact surfaces (windows and doors), and lead soil hazards in children's play areas.

If paint condition is intact, no treatment is required at this time. However, ongoing monitoring and maintenance of painted surfaces containing lead-based paint must be performed on a routine basis as paint conditions may deteriorate potentially creating a lead dust hazard. Painted surfaces should be inspected annually and repainted as needed before deterioration occurs. Prior to any scraping or sanding, appropriate measures should be taken to prevent the generation or spreading of paint chips or dust.

#### **4. HUD Notification:**

A copy of this summary must be provided to new lessees (tenants) and purchasers of this property under Federal Law (24 CFR part 35 and 40 CFR part 745) 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 necessary to protect their children from lead-based paint hazards.

#### **3. Lead Hazard Control Activities:**

- **Floor Plan/Diagram**
- **Risk Assessment Forms**
- **XRF Data Sheets/Photo Log**
- **Lab Results/Chain of Custody**
- **Methodology**
- **Lead Hazard Control Options**
- **Definitions**
- **Lead Based Paint Activity Summary (LBPAS)**
- **XRF Analyzer Performance Characteristics Sheet**
- **Certifications and Licensure**