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PAINT REMOVAL WORK ACTION PLAN

Brewery Arts Center 449 W. King Street Carson City, Nevada 89703

> Contract DEP22-001 Task Number MA27-23

> > **Prepared for:**

State of Nevada Department of Conservation & Natural Resources Division of Environmental Protection 901 South Stewart Street, Suite 4001 Carson City, Nevada 89701

On behalf of:

Brewery Arts Center

June 13, 2023

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PAINT REMOVAL WORK ACTION PLAN (WAP)

SECTION 1 INTRODUCTION

McGinley & Associates, a Universal Engineering Sciences company (UES) has prepared this Paint Removal Work Action Plan (WAP) for the Brewery Arts Center located at 449 West King Street, Carson City, Nevada. The paint removal activities are being funded by a 128(a) Brownfields grant from the United States Environmental Protection Agency (USEPA) to the Nevada Division of Environmental Protection (NDEP) and its associated State of Nevada Brownfields Program (NBP).

The purpose of this project is to restore the brick walls of the Subject Property building by repointing the brick to historical standards. Prior to repointing, the paint on the brick is required to be removed. A lead-based paint assessment conducted on the building exterior determined that the paint associated with the north wall recessed windows are lead-based paint (LBP) and other painted surfaces on the exterior walls to be repointed contain measurable quantities of lead. The assessment report is provided in Attachment A. Photos of the LBP locations are provided in the assessment report.

SECTION 2 SUMMARY OF WORK

The paint removal process will consist of using specialty historic paint stripping and cleaning solutions and pressurized steam/hot water, to strip the paint off from the exterior masonry of the building. Following the stripping process, specialty historic cleaning solutions will be used to further clean the masonry and neutralize any alkalinity in the masonry. All wastewater generated during the paint removal process will be neutralized, collected into a containment system, filtered, and then containerized within a wastewater tank (frac tank or similar). The wastewater will be characterized and subsequently disposed of at a facility permitted to accept the wastewater.

SECTION 3 KEY PROJECT PERSONNEL AND RESPONSIBILITIES

Brownfields Coordinator	NDEP
Owner	The Brewery Arts Center (BAC)
Project Manager	UES
Contractor	Abstract Masonry Restorations

SECTION 4 PERSONAL PROTECTIVE EQUIPMENT (PPE) AND ACCESS

4.1 Respiratory Protection

Respiratory protection that complies with the United States Occupational Safety and Health Administration (OSHA) 1910.1025(f) Respiratory Protection for lead is required during the removal of the LBP. Respiratory protection is required to be used when there is any possibility of disturbance of lead-containing materials, whether intentional or accidental.

For any operation or task where the potential to disturb lead exists, the employer is required to conduct an initial employee exposure assessment to determine whether employees may be exposed to lead at or above the OSHA Action Limit of $30 \ \mu g/m^3$.

OSHA regulations require personal protective equipment and procedures be used on all lead projects, unless specific project documentation including personnel air monitoring for airborne lead levels verifies that protective equipment and procedures are not necessary. The facility competent person and/or Industrial Hygienist or other Safety and Health professional will conduct air monitoring to determine the employee exposure to airborne lead. Air samples shall be collected in the breathing zone of employees where there is potential exposure to lead. Sampling shall be conducted in accordance with NIOSH Method 7082. Where a determination has been made that lead-containing surfaces or materials may be present at the work site, air monitoring shall be conducted periodically during construction activities that are representative of the exposure for each job classification at the work site to represent the initial exposure assessment.

If a negative initial determination is made showing no employees are exposed above the Action Limit, a written record shall be maintained which includes the date of the determination, location within the worksite, type of work performed, and the name and ID number of each employee monitored. If sampling is discontinued and procedures, equipment, or materials involving lead related activities change in such a way as to possibly increase the lead exposure, then sampling will be reinstated

When air monitoring data are not available, respirators must be worn by anyone in a Regulated Area at all times regardless of activity, during a period that starts with any operation which could cause airborne lead contaminated dust, until the area has been cleared for re-occupancy.

Regardless of airborne lead levels, a minimum of a half-face air-purifying respirator with high efficiency particulate air (HEPA) filters with a protection factor of 10 for work environments up to 500 μ g/m³ is required during the removal of the paint.

Initial fit testing of respiratory protection is required during a respiratory protection course of training under the direction of a Safety Officer. Fit test the type of respirator to be actually worn by each individual. Allow an individual to use only those respirators for which training and fit testing have been provided.

Each individual assigned a respirator must check the fit of the respirator by the designated qualitative method chosen by the designated Safety Officer.

All employees that are potentially exposed to lead levels in excess of the OSHA Action Limit of 30 micrograms per cubic meter of air ($\mu g/m^3$) must comply with the OSHA requirements for medical surveillance, exposure monitoring and training and education.

4.2 Protective Clothing

Protective clothing shall be utilized during the removal of paint and during cleaning procedures. Protective clothing will conform to OSHA Standards CFR 1926.62.

4.3 Access

Access to the work areas, during the removal of paint, shall be limited to authorized personnel only. The work areas shall be regulated utilizing barrier tape and warning signs posted at the approach to each work area in accordance with the United States Environmental Protection Agency (EPA) and OSHA requirements.

Access to and from the work areas, during the removal of paint shall be precleaned utilizing wet cleaning procedures and High Efficiency Particulate Air (HEPA) equipped vacuums and maintained throughout the duration of the project. Ladders, scaffolding and/or structural components subject to impact during the lead removal activities are subject to cleaning and paint stabilization.

SECTION 5 PAINT REMOVAL

5.1 Non-Enclosure Preparation

This section applies during the removal of the paint.

The work area(s) shall be regulated utilizing barrier tape and warning signs posted at the approach to the work area in accordance with the EPA and OSHA requirements.

During the removal of the lead coatings, the barrier tape shall be placed at locations to assist in the prevention of any unauthorized personnel from entering the work areas. Cover the ground, under the removal areas, with a minimum of 6-mil polyethylene sheeting to protect the environment from contamination. A containment system should be set up to capture the wastewater and paint debris.

This system can consist of plastic sheeting, tarps, or other materials to create a barrier around the work area.

5.2 Paint Removal

Paint removal refers to the removal of the LBP and lead-containing paint through the use of chemical strippers, cleaning agents, and pressurized steam/hot water. During all removal operations, the contractor shall isolate the immediate work areas with appropriate lead control devices to ensure compliance with current federal regulations and to protect uncertified individuals who may be near the regulated area.

Sequence of Work: Carry out the work of this section sequentially. Complete each activity before proceeding to the next.

- The "Regulated Area" is considered contaminated during the work and must be decontaminated at the completion of the lead removal work. The regulated area will be protected so paint debris does not migrate from this area. Should the area beyond the regulated area(s) become contaminated with lead containing dust or debris as a consequence of the work, those areas would be cleaned in accordance with the procedure indicated in this Section. The Contractor will perform all such required cleaning or decontamination at no additional cost to the Owner.
- The lead control area or "Work Area" is considered the immediate vicinity where paint removal is taking place.
- The Owner will be responsible to supply all additional necessary power, lights and water needed to complete the work of this contract in an efficient manner.
- All tools, equipment, materials, staging, etc. shall be placed in the regulated area necessary for the work in the area to be abated prior to reaching the work area.
- Lockout any power to the regulated area by switching off all breakers serving power or lighting circuits to this area. Label breakers with tape over breaker with notation "Danger circuit being worked on". Lock panel and have keys under control of Contractor's Superintendent.
- The Contractor will use qualified tradesmen for installation of temporary services and facilities including scaffolding and electrical service as appropriate. Locate temporary services and facilities where they will serve the entire project adequately and result in minimum interference with the performance of the work.

- Repair of Damaged Sheeting: Remove and replace plastic sheeting which has been damaged by removal operations or where seal has failed allowing liquids to seep between layers. Remove affected sheeting and wipe down entire area. Install new sheeting only when area is completely dry.
- The paint to be removed, consists of the exterior north, west, and upper south walls of the building. The lead location photos are included in Appendix A.
- Paint associated with those areas determined to be lead-based paint (north wall recessed windows) will be removed first so that solids and wastewater from those areas can be separated out.
- Once paint is removed from the north wall recessed windows, paint removal activities will continue in the remaining areas.
- For chemical stripping, chemical removers shall be non-toxic, non-carcinogenic and compatible with, and not harmful to the substrate to which that they are applied. Chemical removers used on masonry surfaces shall contain anti-stain formulation that inhibits discoloration of stone, granite, brick, and other masonry construction. Chemical stripping agent neutralizers may be used on exterior surfaces only. Neutralizers shall be compatible with and not harmful to the substrate that they are applied to. Neutralizers shall be compatible with the stripping agent that has been applied to the surface substrate. Chemical stripping agents and neutralizers shall be applied in accordance with the recommendations of the manufacturer. Care must be taken to adhere to all health/safety code and other specification section requirements. Stripping agents shall not be allowed to penetrate plaster or substrates. The softened paint shall be removed by scraping or wire brush.
- All paint shall be removed down to the bare substrate surface. With cases in which some pigment may remain embedded in masonry and/or similar substrate, care shall be taken to avoid damage to the substrate with the pressurized steam/hot water. If the pigment cannot be removed without damaging the substrate, the Contractor shall notify the Project Manager or Owner for further instructions.
- Wastewater and paint debris generated during removal activities shall initially be captured in a containment system. The water collected within the containment system shall be filtered prior to delivery into a 20,000-gallon wastewater tank (Frac tank or similar) located onsite. The tank will remain onsite throughout the duration of the paint removal activities. The Contractor will provide 20-micron and 5-micron wastewater filters to drain wastewater for storage and will change filters daily or more often if necessary.

During the use of pressurized steam/hot water removal, low-pressure should be used and the containment shall be structured in such a way as to capture and contain all runoff water. The runoff water shall be considered hazardous until sampled and analyzed to show otherwise.

The use of steam or hot water can result in scalds or burns if proper safety precautions are not taken. The steam or hot water can also create a slip and fall hazard during the removal process. To minimize the hazards, implement appropriate safety measures, including but not limited to wearing proper PPE, training, and engineering controls.

SECTION 6 WASTE MANAGEMENT, CHARACTERIZATION, AND DISPOSAL

6.1 Management

<u>Solids:</u>

Generators of chips, dust, contaminated soils and sludges from commercial or industrial sources which may be contaminated with paint continue to be responsible for the proper characterization of the waste stream prior to disposal. Such materials generated from renovation or remodeling jobs that can be vacuumed (filtered), swept up, or otherwise easily collected will be containerized in drums and fully characterized prior to disposal. Prior to disposal, the solids should be subjected to the TCLP test (EPA Method 1311). If the materials are determined to be hazardous, they must be managed accordingly and transported to a hazardous waste facility for proper disposal. If they are not hazardous, the materials may be transported to a permitted landfill for proper disposal.

Wastewater:

Wastewater generated during the paint removal process shall be managed in accordance with EPA regulations under the Toxic Substances Control Act. Under these regulations, the EPA states that any waste from renovation activities that involve lead-based paint must be contained to prevent the release of dust and debris before the waste is removed and transferred for storage or disposal.

As stated in Section 5, all wastewater will be collected within a containment area and filtered prior to being placed into the wastewater tank. The collected wastewater will remain within the wastewater tank until it is fully characterized for disposal to the Carson City sewer system or disposal at a permitted facility.

6.2 Characterization

The disposal of commercial waste materials containing lead from renovation, removal, and/or demolition is regulated by the Resource Conservation and Recovery Act (RCRA). Further, in accordance with NAC 444.8632, all non-

household generated lead-based paint is required to have a waste determination made on the hazardous characteristics of the leachable lead.

The hazardous waste criterion for lead wastes is established under the federal Resource Conservation and Recovery Act (RCRA), Subtitle C, as 5.0 mg/L measured with the Toxicity Characteristic Leaching Procedure (TCLP) (40 CFR 261.24). The TCLP extract is analyzed for lead to determine if it is above or below the allowable regulatory threshold, which for lead is 5.0 milligrams per liter (mg/L).

<u>Solids:</u>

UES will conduct TCLP testing on the solid waste generated during the paint removal and filtration process.

To determine if the paint removal solids are characteristically hazardous, a representative sample of the containerized solids will be placed in a ziplock type bag, sealed, and labeled prior to delivery to the receiving laboratory. TCLP samples shall not be chilled. Care shall be taken to prevent deterioration or damage to samples during transit. The TCLP samples will be analyzed for metals including lead and chromium. A unique identification number will be assigned for each solids sample. The following format will be used for designation:

TCLP (Solids) Sample ID: BRN098-S-TCLP-001

Wastewater:

UES will initially conduct standard analytical testing on the filtered wastewater generated during the filtration process. One representative sample will be collected from the wastewater tank prior to disposal. A representative sample of the collected wastewater will be placed into laboratory-supplied sample containers of ample volume, sealed, and labeled prior to delivery to the receiving laboratory where the wastewater will be analyzed in accordance with Carson City permit requirements. A unique identification number will be assigned for each wastewater sample. The following format will be used for designation:

Wastewater Sample ID: BRN098-WW-001

If the wastewater has reported constituents greater than Carson City permit limits, the wastewater will be analyzed using TCLP protocol to determine if the wastewater is characteristically hazardous. TCLP samples shall not be chilled. Care shall be taken to prevent deterioration or damage to samples during transit. A unique identification number will be assigned to each TCLP sample. The number will be an alphanumeric sequence that serves as an acronym to identify the sample. The following format will be used for the sample designation:

TCLP (Wastewater) Sample ID: BRN098-WW-TCLP-001

All samples will be submitted to a State of Nevada certified laboratory. All samples shall be delivered to the laboratory utilizing proper chain-of-custody protocol.

6.3 Disposal

<u>Solids:</u>

TCLP Result < 5.0 mg/L

Solid abatement wastes with TCLP results less than 5.0 mg/L are considered "inert" and can be disposed of in the Carson City permitted Landfill.

TCLP Result = 5.0 mg/L or greater:

Solid abatement wastes with TCLP results equal to 5.0 mg/L or greater will be characterized as hazardous and would be required to be disposed of at a hazardous waste disposal facility such as the US Ecology Nevada RCRA/TSCA, Part B Facility located in Beatty, Nevada.

Wastewater:

If the constituents within the initial wastewater sample collected from the wastewater tank are all reported to be less than Carson City permit limits, the wastewater from the tank may be disposed of to the Carson City sewer system located at the project site.

If the initial wastewater sample collected from the wastewater tank has constituent concentrations reported to be greater than Carson City permit limits, the wastewater will be subjected to a TCLP test for lead and chromium in order to characterize it for disposal.

TCLP Result < 5.0 mg/L

Wastewater with TCLP results less than 5.0 mg/L are considered "inert" and can be disposed of at a facility permitted to take wastewater.

TCLP Result = 5.0 mg/L or greater:

Wastewater with TCLP results equal to 5.0 mg/L or greater will be characterized as hazardous and would be required to be disposed of at a hazardous waste disposal facility such as the US Ecology Nevada RCRA/TSCA, Part B Facility located in Beatty, Nevada.

SECTION 7 DECONTAMINATION

A remote decontamination unit shall be available to workers upon exit from each work area. The decontamination unit shall consist of a minimum of a wash station with soap and clean towels. It is recommended that all persons pass through this decontamination unit after working in the work areas.

Before exiting the work area and proceeding to the decontamination unit, HEPA vacuum heavily contaminated protective clothing before removal of the protective clothing. Remove protective clothing and place in a disposal waste bag.

SECTION 8 OVERSIGHT

McGinley/UES will provide project oversight and weekly surveillance to ensure that the paint removal work, including the collection of removed solids and wastewater, is performed in accordance with this work plan and the Contractor approved specifications.

SECTION 9 FINAL INSPECTIONS

After final cleanup is complete, a final visual inspection will be conducted by the Certified Lead Risk Assessor. Upon passing the visual inspection, surface dust wipe samples will be collected from the surfaces previously identified to be leadbased paint and painted surfaces identified to contain measurable quantities of lead. Ten samples are anticipated to be collected. All samples will be transported to an accredited laboratory for analysis. The following format will be used for the sample designation:

Sample ID: BRN085-C-001

All sample locations, size of the sample, and surface components sampled will be recorded and included in the chain of custody form.

SECTION 10 TRAINING

This work will consist of the removal of coatings for historical restoration. Per the lead-based paint assessment some of the coatings have been previously shown or presumed to contain measurable amounts of lead. This is not a lead abatement project, nor is this project subject to Housing and Urban Development (HUD) guidelines. However, the paint removal contractor shall comply with 40 CFR 745 Renovation, Repair and Paint (RRP) regulations.

It is recommended that workers have training in recognizing the hazards of lead and proper methods of preventing or controlling exposures will be provided prior to or at the beginning of work in areas where potential exposures exist. The training will include all personnel who may be exposed to lead hazards at or above the lead Action Level, unless they have received equivalent training within the previous 12 months and have documentation of that training. This also applies to employees of subcontractors, owner's representatives, and regulatory agency employees who may be exposed to the hazards. It does not apply to personnel who will not be exposed. The training should include:

- Methods of recognizing lead hazards.
- The health effects of lead exposure.
- Sources of lead exposure.
- Work practices and engineering controls.
- PPE (protective clothing and respirators).
- Housekeeping and hygiene practices.
- Air sampling procedures and results.
- Medical surveillance program requirements.
- Applicable regulations.
- Review of this WAP.

Appendix A

Lead-Based Paint Assessment



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LIMITED PRE-RESTORATION LEAD-BASED PAINT SURVEY

Brewery Arts Center 449 West King Street Carson City, Nevada 89703

Contract: DEP22-001 Task Number: MA16-22

Prepared for:

State of Nevada Department of Conservation & Natural Resources Division of Environmental Protection 901 S. Stewart Street, Suite 4001 Carson City, Nevada, 89701-5249

On Behalf of:

Brewery Arts Center

June 16, 2022

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Figure 2	Lead Bulk Paint Chip Sample Location Map

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Table 1	Limited Lead-Based Paint Survey – XRF Results
Table 2	Limited Lead-Based Paint Survey – Bulk Paint Chip Sample Results

APPENDICES

- Appendix A Professional Certifications
- Appendix B Analytical Reports and Chains-of-Custody
- Appendix C Laboratory Certifications and Accreditations
- Appendix D Site Photographs

1. INTRODUCTION

McGinley and Associates, Inc. (McGinley) is pleased to submit this report summarizing the results of the limited pre-restoration lead-based paint survey for the Brewery Arts Center located at 449 West King Street, in Carson City, Nevada and hereafter referred to as the Subject Property. The Subject Property building location is presented in Figure 1.

The sampling was conducted on April 14, 2022, by Ms. Aurelia Walsh, an EPA certified Lead Risk Assessor, License No. LBP-R-I203290-1. Copies of professional certifications are included in Appendix A.

The activities discussed in this report were conducted on behalf of the Brewery Arts Center per McGinley's contract with the NDEP (DEP22-001; Cat: 54; Org: 5420; Job #: 6681717; GL: 7060; Task Number: MA16-22).

2. PURPOSE

The purpose of the limited pre-restoration lead-based paint (LBP) survey is to identify lead-based paint that may require appropriate removal, handling, and disposal prior to restoration activities.

3. SCOPE OF WORK

The Limited Pre-Restoration Lead-based Paint Survey activities consisted of the following:

- Performing a limited pre-restoration lead-based paint survey on all structures and
- Preparing this technical report.

4. LIMITED PRE-RENOVATION LEAD-BASED PAINT SURVEY

The lead-based paint (LBP) survey was conducted at the Subject Property in order to determine the presence of lead in painted masonry surfaces likely to be impacted by future restoration activities. The survey was conducted in general accordance with EPA's work practice standards for conducting LBP activities (40 CFR 745.227), and the HUD Guidelines for the Evaluation and Control of Lead-Based Paint Hazards in Housing (Second Edition, July 2012). It should be noted that this was not a comprehensive surface-by-surface investigation for LBP, but rather a screening survey of major coated surfaces where the presence of LBP is suspected.

4.1 Sample Collection

Prior to sampling, a preliminary visual assessment was conducted to evaluate presence, color, and condition of the painted components, determine homogeneous areas, and to develop a sampling scheme. A physical assessment of painted surfaces was conducted to determine if the paint was intact or damaged. Damaged paint appears as cracked, chipped and/or peeling away from the substrate as a result of moisture, wear, heat and/or age. It should be noted that McGinley was not able to access the upper areas of the masonry walls where access doors/windows were absent.

The painted building components were analyzed for lead content by X-ray fluorescence (XRF) using a professional handheld XRF analyzer. A total of 34 readings were collected from the site in accordance with EPA recommendations. The XRF was calibrated prior to sampling and at the conclusion of each sampling each day. A full list of XRF sample results is presented in Table 1.

Once the visual assessment and XRF analysis was complete, bulk confirmation paint chip samples were collected from several of the painted surface areas in order to confirm the XRF

results obtained during the assessment. For this assessment, 13 bulk confirmation paint chip samples were collected from the Subject Property. Each of the bulk paint chip samples collected were placed and sealed in a sample bag and assigned a unique sample identification number (*BRN085-L-001 through BRN085-L-013*). Proper decontamination techniques were utilized after each sample was collected. The bulk confirmation lead samples were submitted using chain-of-custody procedures to Eurofins EMLab P&K, located in Las Vegas, Nevada. The confirmatory paint chip samples were analyzed for lead using flame atomic absorption spectrometry in accordance with the EPA's Method 7000B modified and NIOSH 7082. A full list of paint chip sample locations and results is presented in Table 2. Sample locations are presented in Figures 2.

Copies of analytical reports and chain-of-custodies are included in Appendix B. Copies of laboratory certifications and accreditations are included in Appendix C.

4.2 Lead-Based Paint Sample Results

The United States Department of Housing and Urban Development (HUD) defines lead-based paint (LBP) as any paint, surface coating that contains lead equal to or exceeding 1.0 milligram per square centimeter (1.0 mg/cm²) or 0.5% by weight or lead concentration is greater than 5,000 parts per million (ppm). In addition, OSHA regulates employee exposure during the disturbance of materials containing any detectable amount of lead as stated in CFR Part 1926.62.

A total of 34 XRF readings were collected from the Subject Property on April 14, 2022. Based on the XRF results, 29 of the painted surfaces analyzed were identified as containing detectable quantities of lead including five painted surfaces that met the definition of LBP. The following painted surfaces were identified as LBP:

XRF Sample Number	Sample Location	Sample Description	XRF Reading	XRF Result	
BRN085-XRF-023	North Wall – Recessed Window #1 (Wall)	Tan paint on brick masonry in poor condition	1.60 mg/cm ²	Positive	
BRN085-XRF-024	North Wall – Recessed Window #2 (Wall)	Tan paint on brick masonry in poor condition	6.80 mg/cm ²	Positive	
BRN085-XRF-025	North Wall – Recessed Window #3 (Wall)	Tan paint on brick masonry in poor condition	1.30 mg/cm ²	Positive	
BRN085-XRF-026	North Wall – Recessed Window #4 (Wall)	Tan paint on brick masonry in poor condition	1.90 mg/cm ²	Positive	
BRN085-XRF-027	North Wall – Recessed Window #2 (Wall)	Tan and white paint on brick masonry in poor condition	5.80 mg/cm ²	Positive	

A total of 13 bulk paint-chip samples were collected from the Subject Property on April 14, 2022. Based on the bulk paint-chip sample results, all the painted surfaces analyzed were identified as containing detectable quantities of lead including two painted surfaces that met the definition of LBP. The following painted surfaces were identified as LBP:

Paint-Chip Sample Number	Sample Location	Sample Description	Total Lead Result	Paint-Chip Result
BRN085-L-006	North Wall – 1st Floor Ext. Recessed Window #1 Wall	Tan paint on brick masonry in poor condition	140,000 ppm	Positive

Paint-Chip	Sample Location Sample Description		Total Lead	Paint-Chip
Sample Number			Result	Result
BRN085-L-007	North Wall – 1st Floor Ext. Recessed Window #2 Wall	Tan paint on brick masonry in poor condition	220,000 ppm	Positive

5. **REGULATIONS**

The OSHA Lead Standard for Construction (29 CFR 1926.62) applies to all construction work where an employee may be occupationally exposed to lead. All work related to construction, alteration, or repair (including painting and decorating) is included. The Lead in Construction Standard applies to any detectable concentration of lead in paint as even small concentrations of lead can result in unacceptable employee exposures depending upon on the method of removal and other workplace conditions. Owners or employers conducting renovation or demolition activities which may disturb building materials containing lead (in any concentration) are required to protect their employees from airborne lead exposures in excess of the OSHA permissible exposure limit (PEL). The OSHA standard has established an "Action Level" for airborne lead concentrations of 30 micrograms per cubic meter of air ($\mu g/m^3$) and a "Permissible Exposure Limit" for airborne lead concentrations of 50 $\mu g/m^3$. At this time, the OSHA standard has no established limits for lead content in bulk paint (nonairborne). Their interpretation on this issue is that any amount of lead may cause airborne concentrations above the established limits.

Prior to the disposal of materials generated during building renovation or demolition projects, the US EPA Resource Conservation and Recovery Act (RCRA) regulations require that lead testing be conducted to evaluate whether the waste streams must be disposed of as a lead hazardous material or as general construction debris. The toxicity characteristic leaching procedure (TCLP) test, which is the appropriate method for characterizing demolition debris for lead content, involves the collection of samples from representative building materials and the analysis of the materials by an accredited laboratory. If the sample results are less than 5.0 milligrams per liter (mg/L) lead, then the demolition waste can be disposed of as nonhazardous construction debris. If the sample results are greater than or equal to 5.0 mg/L lead, then the demolition waste must be disposed of as a hazardous waste.

6. CONCLUSIONS AND RECOMMENDATIONS

Based on the XRF and bulk paint-chip sample results, seven painted surfaces associated with the Brewery Arts Center contain concentrations of lead greater than 1.0 mg/cm² and/or 5,000 ppm. It appears that the LBP is primarily located on the North Wall brick masonry recessed window walls. In addition, all three masonry walls of Brewery Arts Center were identified as containing detectable quantities of lead that may constitute a lead dust hazard during restoration activities. Therefore, personnel performing activities that may disturb painted components with concentrations of lead above the designated analytical detection limit should comply with all current OSHA regulations (29 CFR 1926.62 – Lead Exposure in Construction) in order to minimize employee exposure.

It is recommended that the EPA and OSHA regulatory guidelines are followed during any disturbance of the paints and materials identified to contain lead. Any building materials identified with lead-based paint or paint containing lead that will be impacted during the restoration activities should be removed or stabilized by a qualified lead-paint abatement contractor. Per the regulations described in Section 5, the LBP to be removed (e.g., scrapped, chipped, sandblasted) from surfaces must be analyzed using a TCLP test to determine whether the residue is considered a hazardous waste.

There is a possibility that additional suspect painted surfaces may be encountered during restoration activities. Should any suspect painted surfaces, not sampled or assessed in this report, be uncovered at any time, the following steps should be taken:

• Samples of the suspect material should be collected and any activities which may affect the materials or expose workers to the damaged materials should cease until the laboratory analysis is performed.

7. LIMITATIONS

The conclusions presented herein are partially based on information provided by McGinley. McGinley makes no warranties or guarantees as to the accuracy or completeness of information provided or compiled by others. The results reported herein are applicable to the time the sampling occurred. In addition, not all building materials were accessible at the time of the assessment. Therefore, inaccessible areas may have unidentified LBP present that will require future assessment and/or abatement not characterized in this report.

It should be recognized that definition and evaluation of environmental conditions is a difficult and inexact science. Judgments and opinions leading to conclusions and recommendations are generally made with an incomplete knowledge of the conditions present. More extensive studies, including additional environmental investigations, can tend to reduce the inherent uncertainties associated with such studies. Additional information not found or available to McGinley at the time of writing this report may result in a modification to the conclusions and recommendations contained herein.

The presentation of data presented herein is intended for the purpose of the visualization of environmental conditions. A greater degree of spatial and temporal data density may result in a more accurate representation of environmental conditions. Although such data visualization techniques may aid in providing a conceptual understanding of environmental conditions, such presentations are not intended to completely depict environmental conditions.

This report is not a legal opinion. The services performed by McGinley have been conducted in a manner consistent with the level of care ordinarily exercised by members of our profession currently practicing under similar conditions. No other warranty, expressed or implied, is made.

The use of the word "certify" in this document constitutes an expression of professional opinion regarding those facts or findings which are the subject of the certification and does not constitute a warranty or guarantee, either expressed or implied.

8. CLOSURE

We appreciate the opportunity to provide these services to the Brewery Arts Center. Should you have any questions regarding the contents of this report, or need additional information, please contact us at your convenience.

Respectfully submitted,

McGinley and Associates, Inc.

relia

Aurelia J. Walsh EPA Lead Risk Assessor License No. LBP-R-I203290-1 Environmental Project Manager

Reviewed by:

Brett C. Bottenberg, P.E., C.E.M. #1690, Exp. 10/7/23 Operations Manager, Las Vegas





Figure 1 Project Location Map - Brewery Arts Center 449 West King Street Carson City, Nevada 89703

Project No. BRN085

4480 West Hacienda Avenue, Suite 104, Las Vegas, Nevada 89118 Office: (702) 873-3478, Fax: (702) 873-2199



TABLE 1Limited Lead-Based Paint Survey – XRF Results

Table 1: Limited	Table 1: Limited Lead-Based Paint Survey – XRF Results									
Sample Number	Building	Sample Location	Sample Area	Building Component	Color	Substrate	Condition	XRF Reading	Depth Index	Result
BRN088-XRF-001	Brewery Arts Center	Calibration	N/A	N/A	N/A	N/A	N/A	1.10	1.00	Positive
BRN088-XRF-002	Brewery Arts Center	Calibration	N/A	N/A	N/A	N/A	N/A	1.10	1.00	Positive
BRN088-XRF-003	Brewery Arts Center	South Wall	East Side of Wall	Wall	Tan	Brick and Mortar	Poor	0.14	3.60	Negative
BRN088-XRF-004	Brewery Arts Center	South Wall	East Side of Wall	Wall	Red	Brick and Mortar	Poor	0.05	2.60	Negative
BRN088-XRF-005	Brewery Arts Center	South Wall	Center of Wall	Wall	Black	Brick and Mortar	Poor	0.08	1.30	Negative
BRN088-XRF-006	Brewery Arts Center	South Wall	Center of Wall	Wall	Red	Brick and Mortar	Poor	0.05	2.70	Negative
BRN088-XRF-007	Brewery Arts Center	South Wall	Center of Wall	Wall	Red	Brick and Mortar	Poor	0.05	3.50	Negative
BRN088-XRF-008	Brewery Arts Center	South Wall	Center of Wall	Wall	Tan	Brick and Mortar	Poor	0.07	3.50	Negative
BRN088-XRF-009	Brewery Arts Center	South Wall	West Side of Wall	Wall	Tan	Brick and Mortar	Poor	0.01	1.00	Negative
BRN088-XRF-010	Brewery Arts Center	South Wall	West Side of Wall	Wall	Red	Brick and Mortar	Poor	0.03	1.90	Negative
BRN088-XRF-011	Brewery Arts Center	South Wall	West Side of Wall	Wall	Tan	Brick and Mortar	Poor	0.08	2.30	Negative
BRN088-XRF-012	Brewery Arts Center	South Wall	West Side of Wall	Wall	Red	Brick and Mortar	Poor	-0.05	4.00	Negative
BRN088-XRF-013	Brewery Arts Center	South Wall	West Side of Wall	Wall	Red	Brick and Mortar	Poor	0.16	3.20	Negative
BRN088-XRF-014	Brewery Arts Center	North Wall	West Side of Wall	Wall	Tan	Brick and Mortar	Poor	0.40	3.30	Negative
BRN088-XRF-015	Brewery Arts Center	North Wall	West Side of Wall	Wall	Tan	Brick and Mortar	Poor	0.70	7.90	Negative
BRN088-XRF-016	Brewery Arts Center	North Wall	Center of Wall	Wall	Black	Brick and Mortar	Poor	0.07	1.90	Negative
BRN088-XRF-017	Brewery Arts Center	North Wall	Center of Wall	Wall	Tan	Brick and Mortar	Poor	0.40	6.00	Negative
BRN088-XRF-018	Brewery Arts Center	North Wall	East Side of Wall	Wall	Tan	Brick and Mortar	Poor	0.04	2.00	Negative
BRN088-XRF-019	Brewery Arts Center	North Wall	East Side of Wall	Wall	Tan	Brick and Mortar	Poor	0.40	5.90	Negative
BRN088-XRF-020	Brewery Arts Center	North Wall	West Side of Wall	Wall	Red	Brick and Mortar	Poor	0.01	1.10	Negative
BRN088-XRF-021	Brewery Arts Center	North Wall	Center of Wall	Wall	Red	Brick and Mortar	Poor	0.07	2.60	Negative
BRN088-XRF-022	Brewery Arts Center	North Wall	East Side of Wall	Wall	Red	Brick and Mortar	Poor	0.01	1.00	Negative
BRN088-XRF-023	Brewery Arts Center	North Wall	Recessed Window #1 Wall	Wall	Tan	Brick and Mortar	Poor	1.60	3.00	Positive
BRN088-XRF-024	Brewery Arts Center	North Wall	Recessed Window #2 Wall	Wall	Tan	Brick and Mortar	Poor	6.80	2.40	Positive
BRN088-XRF-025	Brewery Arts Center	North Wall	Recessed Window #3 Wall	Wall	Tan	Brick and Mortar	Poor	1.30	4.10	Positive
BRN088-XRF-026	Brewery Arts Center	North Wall	Recessed Window #4 Wall	Wall	Tan	Brick and Mortar	Poor	1.90	4.10	Positive
BRN088-XRF-027	Brewery Arts Center	North Wall	Recessed Window #2 Wall	Wall	Tan/White	Brick and Mortar	Poor	5.80	1.40	Positive
BRN088-XRF-028	Brewery Arts Center	West Wall	North Side of Wall	Wall	Tan	Brick and Mortar	Poor	0.01	1.70	Negative
BRN088-XRF-029	Brewery Arts Center	West Wall	North Side of Wall	Wall	Tan	Brick and Mortar	Poor	0.03	4.80	Negative
BRN088-XRF-030	Brewery Arts Center	West Wall	Center of Wall	Wall	White	Brick and Mortar	Poor	0.01	1.30	Negative
BRN088-XRF-031	Brewery Arts Center	West Wall	Center of Wall	Wall	Tan	Brick and Mortar	Poor	0.00	0.10	Negative
BRN088-XRF-032	Brewery Arts Center	West Wall	East Side of Wall	Wall	Tan	Brick and Mortar	Poor	0.20	2.80	Negative
BRN088-XRF-033	Brewery Arts Center	West Wall	East Side of Wall	Wall	Tan	Brick and Mortar	Poor	0.00	0.10	Negative
BRN088-XRF-034	Brewery Arts Center	North Wall	Second Floor Recessed Window #2	Wall	Tan	Brick and Mortar	Poor	0.03	2.60	Negative
BRN088-XRF-035	Brewery Arts Center	North Wall	Second Floor Recessed Window #1	Wall	Tan	Brick and Mortar	Poor	0.00	0.10	Negative
BRN088-XRF-036	Brewery Arts Center	North Wall	Second Floor Recessed Window #1	Wall	Tan	Brick and Mortar	Poor	0.00	0.10	Negative

TABLE 2

Limited Lead-Based Paint Survey – Bulk Paint Chip Sample Results

Table 2: Limited Lead-Based Paint Survey – Bulk Paint Chip Sample Results									
Sample ID	Building	Sample Location	Sample Area	Sample Description	Condition	Reporting Limit	Total Lead Result		
BRN085-L-001	Brewery Arts Center	North Wall	2nd Floor Ext Recessed Window #1 Wall	Tan Paint on Brick Masonry	Poor	41 ppm	760 ppm		
BRN085-L-002	Brewery Arts Center	North Wall	2nd Floor Ext Recessed Window #3 Window Sill	Red Paint on Stone Masonry	Poor	39 ppm	340 ppm		
BRN085-L-003	Brewery Arts Center	North Wall	2nd Floor Ext Recessed Window #3 Window Sill	Tan Paint on Stone Masonry	Poor	39 ppm	3,100 ppm		
BRN085-L-004	Brewery Arts Center	North Wall	1st Floor Ext Wall	Red Paint on Brick Masonry	Poor	40 ppm	160 ppm		
BRN085-L-005	Brewery Arts Center	North Wall	1st Floor Ext Wall	Tan Paint on Brick Masonry	Poor	40 ppm	900 ppm		
BRN085-L-006	Brewery Arts Center	North Wall	1st Floor Ext Recessed Window #1 Wall	Tan Paint on Brick Masonry	Poor	40 ppm	140,000 ppm		
BRN085-L-007	Brewery Arts Center	North Wall	1st Floor Ext Recessed Window #2 Wall	Tan Paint on Brick Masonry	Poor	40 ppm	220,000 ppm		
BRN085-L-008	Brewery Arts Center	South Wall	2nd Floor Ext Wall	Red Paint on Brick Masonry	Poor	40 ppm	270 ppm		
BRN085-L-009	Brewery Arts Center	South Wall	2nd Floor Ext Wall	Red Paint on Brick Masonry	Poor	38 ppm	100 ppm		
BRN085-L-010	Brewery Arts Center	South Wall	2nd Floor Ext Wall	Tan Paint on Brick Masonry	Poor	39 ppm	1,200 ppm		
BRN085-L-011	Brewery Arts Center	West Wall	1st Floor Ext Wall	Tan Paint on Brick Masonry	Poor	39 ppm	4,600 ppm		
BRN085-L-012	Brewery Arts Center	West Wall	1st Floor Ext Wall	Tan and White Paint on Brick Masonry	Poor	40 ppm	1,900 ppm		
BRN085-L-013	Brewery Arts Center	West Wall	1st Floor Ext Wall	Tan Paint on Brick Masonry	Poor	39 ppm	1,800 ppm		

APPENDIX A Professional Certifications

United States Environmental Protection Agency This is to certify that

Aurelia J Walsh



has fulfilled the requirements of the Toxic Substances Control Act (TSCA) Section 402, and has received certification to conduct lead-based paint activities pursuant to 40 CFR Part 745.226 as:

Risk Assessor

In the Jurisdiction of:

All EPA Administered Lead-based Paint Activities Program States, Tribes and

I erritories This certification is valid from the date of issuance and expires June 28, 2022

Adrienne Priselac, Manager, Toxics Office

Land Division

LBP-R-I203290-1

Certification #

June 14, 2019

Issued On



APPENDIX B

Analytical Reports and Chains-of-Custody



Report for:

Aurelia Walsh McGinley and Associates 815 Maestro Drive Reno, NV 89511

Regarding: Project: BRN085; Brewery Arts-LBP EML ID: 2900955

Approved by:

Laboratory Manager Danny Li

Dates of Analysis: Lead - Flame AA: 04-15-2022

Service SOPs: Lead - Flame AA (EM-BC-S-8443) AIHA-LAP, LLC accredited service, Lab ID #178697

All samples were received in acceptable condition unless noted in the Report Comments portion in the body of the report. Due to the nature of the analyses performed, field blank correction of results is not applied. The results relate only to the samples as received and tested. Sample size, as it relates to Wipe samples only, is supplied by the client.

Eurofins EMLab P&K ("the Company") shall have no liability to the client or the client's customer with respect to decisions or recommendations made, actions taken or courses of conduct implemented by either the client or the client's customer as a result of or based upon the Test Results. In no event shall the Company be liable to the client with respect to the Test Results except for the Company's own willful misconduct or gross negligence nor shall the Company be liable for incidental or consequential damages or lost profits or revenues to the fullest extent such liability may be disclaimed by law, even if the Company has been advised of the possibility of such damages, lost profits or lost revenues. In no event shall the Company's liability with respect to the Test Results exceed the amount paid to the Company by the client therefor.

Eurofins EMLab P&K's LabServe® reporting system includes automated fail-safes to ensure that all AIHA-LAP, LLC quality requirements are met and notifications are added to reports when any quality steps remain pending.

Eurofins EMLab P&K

Client: McGinley and Associates C/O: Aurelia Walsh Re: BRN085; Brewery Arts-LBP

2841 Dow Avenue, Suite 300, Tustin, CA 92780 (866) 888-6653 Fax (623) 780-7695 www.emlab.com

Date of Submittal: 04-14-2022 Date of Receipt: 04-14-2022 Date of Report: 04-15-2022

LEAD: FLAME ATOMIC ABSORPTION SPECTROMETRY

Location:	BRN085-L-001: 2nd Floor-Ext, North Wall, Window 1- Recessed Wall, Tan Paint on Brick Masonry	BRN085-L- 002: 2nd Floor-Ext, North Wall, Window 3- Window Still, Red Paint on Stone Masonry	BRN085-L- 003: 2nd Floor-Ext. North Wall, Window 3- Window Sill, Tan Paint on Stone Masonry	BRN085-L- 004: 1st Floor-Ext. North Wall, North Wall, Red Paint on Brick Masonry	BRN085-L- 005: 1st Floor-Ext. North Wall, North Wall, Tan Paint on Brick Masonry
Comments (see below)	None	None	None	None	None
Lab ID-Version [‡] :	13921623-1	13921624-1	13921625-1	13921626-1	13921627-1
Analysis Date:	04/15/2022	04/15/2022	04/15/2022	04/15/2022	04/15/2022
Sample type	Paint Chip sample	Paint Chip sample	Paint Chip sample	Paint Chip sample	Paint Chip sample
Method*	NIOSH 7082 & EPA 7000B modified	NIOSH 7082 & EPA 7000B modified	NIOSH 7082 & EPA 7000B modified	NIOSH 7082 & EPA 7000B modified	NIOSH 7082 & EPA 7000B modified
† Method Reporting Limit	41 ppm	39 ppm	39 ppm	40 ppm	40 ppm
Sample size	0.2467 grams	0.2564 grams	0.2538 grams	0.2511 grams	0.2513 grams
§Total Lead Result	760 ppm	340 ppm	3100 ppm	160 ppm	900 ppm

Comments:

Sample results have not been corrected for blank values.

Bulk samples are not covered under the AIHA-LAP, LLC service accreditation.

Wipe samples must meet ASTM E1792 criteria. Method Reporting Limits may not be valid for non-ASTM E1792 wipe samples.

*Sample preparation and analytical methods are based upon NIOSH 7082 and EPA 7000B.

† The Method Reporting Limit is the minimum concentration of Lead that the laboratory can confidently detect in the sample.

§ Total Lead Result has been rounded to two significant figures to reflect analytical precision.

‡ A "Version" indicated by -"x" after the Lab ID# with a value greater than 1 indicates a sample with amended data. The revision number is reflected by the value of "x".

Eurofins EMLab P&K

Client: McGinley and Associates C/O: Aurelia Walsh Re: BRN085; Brewery Arts-LBP 2841 Dow Avenue, Suite 300, Tustin, CA 92780 (866) 888-6653 Fax (623) 780-7695 www.emlab.com

Date of Submittal: 04-14-2022 Date of Receipt: 04-14-2022 Date of Report: 04-15-2022

LEAD: FLAME ATOMIC ABSORPTION SPECTROMETRY

Location:	BRN085-L-006: 1st Floor-Ext. North Wall, Window 1- Recessed Wall, Tan Paint on Brick Masonry	BRN085-L-007: 1st Floor-Ext. North Wall, Window 2- Recessed Wall, Tan Paint on Brick Masonry	BRN085-L-008: 2nd Floor-Ext. South Wall, South Wall, Red Paint on Brick Masonry	BRN085-L-009: 2nd Floor-Ext. South Wall, South Wall, Red Paint on Brick Masonry
Comments (see below)	None	None	None	None
Lab ID-Version [‡] :	13921628-1	13921629-1	13921630-1	13921631-1
Analysis Date:	04/15/2022	04/15/2022	04/15/2022	04/15/2022
Sample type	Paint Chip sample	Paint Chip sample	Paint Chip sample	Paint Chip sample
Method*	NIOSH 7082 & EPA 7000B modified	NIOSH 7082 & EPA 7000B modified	NIOSH 7082 & EPA 7000B modified	NIOSH 7082 & EPA 7000B modified
† Method Reporting Limit	40 ppm	40 ppm	40 ppm	38 ppm
Sample size	0.2502 grams	0.2510 grams	0.2501 grams	0.2598 grams
§Total Lead Result	140000 ppm	220000 ppm	270 ppm	100 ppm

Comments:

Sample results have not been corrected for blank values.

Bulk samples are not covered under the AIHA-LAP, LLC service accreditation.

Wipe samples must meet ASTM E1792 criteria. Method Reporting Limits may not be valid for non-ASTM E1792 wipe samples.

*Sample preparation and analytical methods are based upon NIOSH 7082 and EPA 7000B.

[†] The Method Reporting Limit is the minimum concentration of Lead that the laboratory can confidently detect in the sample.

§ Total Lead Result has been rounded to two significant figures to reflect analytical precision.

‡ A "Version" indicated by -"x" after the Lab ID# with a value greater than 1 indicates a sample with amended data. The revision number is reflected by the value of "x".

Eurofins EMLab P&K

Client: McGinley and Associates C/O: Aurelia Walsh Re: BRN085; Brewery Arts-LBP 2841 Dow Avenue, Suite 300, Tustin, CA 92780 (866) 888-6653 Fax (623) 780-7695 www.emlab.com

Date of Submittal: 04-14-2022 Date of Receipt: 04-14-2022 Date of Report: 04-15-2022

LEAD: FLAME ATOMIC ABSORPTION SPECTROMETRY

Location:	BRN085-L-010: 2nd Floor-Ext. South Wall, South Wall, Tan Paint on Brick Masonry	BRN085-L-011: 1st Floor-Ext. West Wall, West Wall, Tan Paint on Brick Masonry	BRN085-L-012: 1st Floor-Ext. West Wall, West Wall, Tan & White Paint on Brick Masonry	BRN085-L-013: 1st Floor-Ext. West Wall, West Wall, Tan Paint on Brick Masonry
Comments (see below)	None	None	None	None
Lab ID-Version [‡] :	13921632-1	13921633-1	13921634-1	13921635-1
Analysis Date:	04/15/2022	04/15/2022	04/15/2022	04/15/2022
Sample type	Paint Chip sample	Paint Chip sample	Paint Chip sample	Paint Chip sample
Method*	NIOSH 7082 & EPA 7000B modified	NIOSH 7082 & EPA 7000B modified	NIOSH 7082 & EPA 7000B modified	NIOSH 7082 & EPA 7000B modified
† Method Reporting Limit	39 ppm	39 ppm	40 ppm	39 ppm
Sample size	0.2562 grams	0.2579 grams	0.2516 grams	0.2572 grams
§Total Lead Result	1200 ppm	4600 ppm	1900 ppm	1800 ppm

Comments:

Sample results have not been corrected for blank values.

Bulk samples are not covered under the AIHA-LAP, LLC service accreditation.

Wipe samples must meet ASTM E1792 criteria. Method Reporting Limits may not be valid for non-ASTM E1792 wipe samples.

*Sample preparation and analytical methods are based upon NIOSH 7082 and EPA 7000B.

† The Method Reporting Limit is the minimum concentration of Lead that the laboratory can confidently detect in the sample.

§ Total Lead Result has been rounded to two significant figures to reflect analytical precision.

‡ A "Version" indicated by -"x" after the Lab ID# with a value greater than 1 indicates a sample with amended data. The revision number is reflected by the value of "x".

THAIN OF CUSTODY INFORMATION: Relinguished By: (sign/print)	A Universal Engineering Sciences Con Las Vegas, Nevada 89118 702-873-3478 Sample ID Building/Floor RN085-L-002 AN085-L-002 AN085-L-007 AN085-L-007 AN085-L-007 AN085-L-007 AN085-L-007 AN085-L-007 AN085-L-007 AN085-L-017 AN0	McGinley & Associa
H 14 Date / Time H 14 12 C 1:58 pm	PO: Site Address: 449 W. King SE. Careson City, NV Careson City, NV Sample Location Ext. Mindow 1 - Recessed Wall Window 3 - Window Sill Window 3 - Window Sill Window 1 - Recessed Wall Window 2 - Recessed Wall Control of the transformer South Wall Control of the transformer Control of the transformer Control of the transformer South Wall Control of the transformer Control of the transformer South Wall Control of the transformer	Project Name: Brenery Arts - LBP Project Number: BENOES
Received By: (sign/print)	Phone: HOZ ZHROHIS Lab Notes: Tan Paint on Brick Masonrey Lab Notes: Lab Note	Email: AWALSHEVNWERSALENGINEERINA ACHINE R
Date / Time	Condition Poor Poor Poor Poor Poor Poor Poor Po	Lab Flame AR-

LEAD-BASED PAINT SAMPLE DATA SHEET

APPENDIX C

Laboratory Certifications and Accreditations



AIHA Laboratory Accreditation Programs, LLC acknowledges that Eurofins EMLab P&K 2841 Dow Ave Suite 300 Tustin, CA 92780 Laboratory ID: LAP-178697

along with all premises from which key activities are performed, as listed above, has fulfilled the requirements of the AIHA Laboratory Accreditation Programs (AIHA LAP), LLC accreditation to the ISO/IEC 17025:2017 international standard, General Requirements for the Competence of Testing and Calibration Laboratories in the following:

LABORATORY ACCREDITATION PROGRAMS

\sim	INDUSTRIAL HYGIENE	Accreditation Expires: September 01, 2023
\checkmark	ENVIRONMENTAL LEAD	Accreditation Expires: September 01, 2023
\checkmark	ENVIRONMENTAL MICROBIOLOGY	Accreditation Expires: September 01, 2023
	FOOD	Accreditation Expires:
	UNIQUE SCOPES	Accreditation Expires:
	BERYLLIUM FIELD/MOBILE	Accreditation Expires:

Specific Field(s) of Testing (FoT)/Method(s) within each Accreditation Program for which the above named laboratory maintains accreditation is outlined on the attached Scope of Accreditation. Continued accreditation is contingent upon successful on-going compliance with ISO/IEC 17025:2017 and AIHA LAP, LLC requirements. This certificate is not valid without the attached Scope of Accreditation. Please review the AIHA LAP, LLC website (www.aihaaccreditedlabs.org) for the most current Scope.

Cheryl J. Marton

Cheryl O Morton Managing Director, AIHA Laboratory Accreditation Programs, LLC

Date Issued: 08/31/2021

Revision19.1: 07/28/2021



AIHA Laboratory Accreditation Programs, LLC SCOPE OF ACCREDITATION

Eurofins EMLab P&K

Laboratory ID: LAP-178697

2841 Dow Ave Suite 300 Tustin, CA 92780

The laboratory is approved for those specific field(s) of testing/methods listed in the table below. Clients are urged to verify the laboratory's current accreditation status for the particular field(s) of testing/Methods, since these can change due to proficiency status, suspension and/or withdrawal of accreditation.

The EPA recognizes the AIHA LAP, LLC ELLAP program as meeting the requirements of the National Lead Laboratory Accreditation Program (NLLAP) established under Title X of the Residential Lead-Based Paint Hazard Reduction Act of 1992 and includes paint, soil and dust wipe analysis. Air and composited wipes analyses are not included as part of the NLLAP.

Environmental Lead Laboratory Accreditation Program (ELLAP)

Initial Accreditation Date: 03/01/2017

Component, parameter or characteristic tested	Technology sub-type/Detector	Method	Method Description (for internal methods only)
Paint	۸۵	EPA SW-846 7000B Modified	N/A
	AA	NIOSH 7082	N/A
Settled Dust by Wipe	A A	EPA SW-846 7000B Modified	N/A
		NIOSH 7082	N/A

A complete listing of currently accredited ELLAP laboratories is available on the AIHA LAP, LLC website at: <u>http://www.aihaaccreditedlabs.org</u>

Issue Date: 08/31/2021

APPENDIX D Site Photographs





View of LBP on brick masonry - Recessed Window #1 (Right) and Recessed Window #2 (Left)





View of LBP on brick masonry - Recessed Window #2 (Right), Window #3, (Center), and Window #4 (Left)