

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



August 27, 1997

Francis Collins
6050 Hollis St.
Emeryville CA 94608

ENVIRONMENTAL HEALTH SERVICES
ENVIRONMENTAL PROTECTION
1131 Harbor Bay Parkway, Suite 250
Alameda, CA 94502-6577
(510) 567-6700
FAX (510) 337-9335

**Re: Roof Removal Activities
Dutch Boy Studios, 4701 San Leandro St., Oakland**

Dear Mr. Collins:

Earlier this month a number of tenant calls came in to this Office, the Alameda County Lead Poisoning Prevention Program, and the City of Oakland. The callers expressed concern about lead dust contamination from the roof removal from building 2. This is the large work building second from the left at the main entrance to the complex.

Today at Dutch Boy I met with Debra Baker and Josh Willes (work crew leader) to discuss how this work has been carried out. They described work practices designed to keep lead dust contamination to a minimum, such as HEPA vacuuming the work area and building components, and plastic-wrapping components to be disposed of. They also described worker protection practices and procedures. Debra Baker said that the crew has identified some problems with how job was being performed in the early part of this month and has made some work practice improvements to minimize lead dust contamination.

Please ensure that your work crews follow federal (Housing and Urban Development) guidelines in carrying out this and all other work that could create a lead hazard for residents of the complex. While building 2 is not residential, work on the roof and other components of this building is highly likely to impact residential and commercial tenants throughout the property. It is adjacent to the main driveway, two courtyards, a main parking area and several residential units. As well, it is a tall building undergoing major renovation, and has been associated historically with heavy lead dust contamination.

While lead dust control is a challenge, **it is essential that the work not increase the level of lead dust contamination outside the work area.** A certified lead risk assessor or abatement supervisor should judge the level of site preparation needed for each job prior to the beginning of work. The following items are **in addition** to lead dust control practices and procedures the crew leader is says he is currently following when working on exterior components that could generate lead dust.

- 1) Ensure that workers are fully trained in work practices that limit their own exposure to lead and that prevent contamination to the surrounding areas.
- 2) Post warning signs on the outside of the building being worked on and on other buildings and public access areas within 20 feet of the building.

Francis Collins
Dutch Boy Studios
August 27, 1997
Page 2 of 2

- 3) Confine and contain lead dust from exterior building work. Place a layer of plastic sheeting, following HUD guidelines. Discontinue work if wind speeds exceed 20 mph. Use vertical sheeting to contain any dust generated from the removal of roof and other building components.
- 4) As practical, lightly mist components to be removed to keep dust down.
- 5) Prohibit entry of tenants and other non-workers into the work area. Work crews should use barriers, notices and visual monitoring to keep non-essential people out of lead work areas.
- 6) Clean publicly accessible work areas daily. Certain areas around and within buildings may be accessible to tenants at the end of the work day. When lead dust is being generated, accessible areas require daily removal of debris and plastic sheeting. These areas also require cleaning to remove as much lead dust as possible.
- 7) Do not leave debris or plastic outside overnight if work is not completed. Lockable fencing should be used around areas where contaminated debris are stored.

You may contact me with any questions or comments at (510)567-6770.

Sincerely,



Pamela J. Evans
Senior Hazardous Materials Specialist

- c: Jun Makashima, ACDEH
Gordon Coleman, ACDEH
██████████, ACDEH
Dennis Jordon, Alameda County Lead Poisoning Prevention Program
Bob Chambers, Alameda County District Attorney's Office
Leroy Griffin, Oakland Fire Department
Debra Baker, Property Manager
Ed Warren, Dutch Boy Artists' Community
Chris 'Wabuzoh, Sequoia Environmental Consulting Services
Jim Ratti, Environmental Lead Detection

Date: August 12, 1997
To: Gordon Coleman
From: Madhulla Logan
Subject: Dutch Boy Project at 4701 San Leandro, Oakland, CA

In response to the complaint that you received from the lead abatement district, I inspected the above referenced site on August 12, 1997. I met the consultant Chris Wabuza and some of the lead abatement contractors. At present, they are removing the old metal sheet roofs and replacing it with a new roof. As part of the process of removing the old sheet (since they could be contaminated with lead), holes are made in the metal sheet to remove the bolts. According to the contractors, some amount of debris, which is mostly solidified pieces have been falling down the building during the replacement process, but this should not effect the neighboring building. Also, the pieces are vacuum cleaned as soon as they come down. During my visit, the area was relatively clean.

When I brought the topic of spraying water to keep the debris down, they mentioned that they could do this only to some extent as it would increase the chance of workers slipping down the roof. As far as health and safety protection, I saw the workers wearing respirators while on the roof. I was told by the consultant that it is mandated that the workers wear respirators throughout the whole process.

I have relayed this information to Damien of the lead abatement district and requested that in future the complaints be referred to this Department.

ALAMEDA COUNTY
HEALTH CARE SERVICES



AGENCY
DAVID J. KEARS, Agency Director

ENVIRONMENTAL HEALTH SERVICES
1131 Harbor Bay Parkway, Suite 250
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(510) 567-6700
(510) 337-9335 (FAX)

April 30, 1997

Chris 'Wabuzoh
Sequoia Environmental
1111 Aladdin Av., Suite B
San Leandro CA 94577

**Re: Project Status, Lead-based Paint Hazard Reduction at
Dutch Boy Studios, 4701 San Leandro St., Oakland**

Dear Mr. 'Wabuzoh:

I am writing this letter as a follow-up to our telephone conversation today. I have reviewed your March 27, 1997 project update letter and expect another update around May 5, 1997. You told me that you have completed work on five units and are awaiting clearance sampling results. You also said that work continues on another set of units and projected that residential lead hazard reduction work might be completed by the end of May. In your next report, please specify which units have passed clearance. Also say which units are being worked on, the stage of work, and the expected completion date. You also told me that you may experience delays due to difficulty coordinating the work with tenants occupying the remaining units. I have contacted a representative of the tenants and offered to assist with this coordination if necessary. Please submit your final report on lead hazard reduction work within 30 days of completing the work. Also, please report on your efforts to identify and, if necessary, remediate other contaminants of concern related to current and past property uses.

As Ralph Ray is no longer with the Alameda County Lead Poisoning Prevention Program, please direct requests for guidance and forward originals of all reports on site clean-up to me. Please forward copies of reports to Julie Twichell of the Lead Program. The County may periodically inspect the site to ensure that 1) site hazards have been fully and properly assessed and 2) the abatement contractor is carrying out the work properly. You may contact me at (510)567-6770 with any questions or comments.

Sincerely,

Pamela J. Evans
Senior Hazardous Materials Specialist

cc: Jun Makashima, ACDEH
Gordon Coleman, ACDEH
Madhulla Logan, ACDEH
Francis Collins, property owner
Julie Twichell, Alameda County Lead Poisoning Prevention Program
Bob Chambers, Alameda County District Attorney's Office
Leroy Griffin, Oakland Fire Department
Ed Warren, Dutch Boy Artists' Community
Jim Ratti, Environmental Lead Detection

MEETING REGARDING DUTCH BOY STUDIOS WORK PLAN

January 13, 1997

I. Purpose and Goals of the Meeting

II. Lead Hazard Reduction Timetable

III. Work Plan - Discussion, Questions and Answers

IV. Conclusion - Next Steps

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



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ENVIRONMENTAL HEALTH SERVICES
1131 Harbor Bay Parkway
Alameda, CA 94502-6577
(510)

December 31, 1996

Francis Collins
6050 Hollis St.
Emeryville CA 94608

**Re: Lead-based Paint Workplan for Dutch Boy Studios
4701 San Leandro St., Oakland**

Dear Mr. Collins:

I have recently reviewed the Workplan for Lead-Based Paint and Soil Abatement submitted by Chris Wabuzoh of Sequoia Environmental (dated December 6, 1996). The review process for this and other reports submitted by your contractor has been extended in nearly every case due to lack of report completeness and clarity. This in turn has delayed important and much needed lead abatement and control work at the property.

The Offices involved with the review and approval, Environmental Health and the Lead Poisoning Prevention, continue to work with you and your contractors to move this lead hazard reduction project forward. However, continued delays and missed deadlines will result in further enforcement action against you. **Thus, it is essential that you ensure that your contractors are qualified and on task and that you approve and implement a revised workplan as soon as possible.** I will expect to receive a proper workplan that addresses the issues outlined in Attachment A by **January 24, 1997**. The lead hazard reduction work must begin within one week of final approval of the workplan by this Office.

As your workplan had been for a complete abatement (removal) of all lead contaminated components at the property, it would not be as important to point out reporting, inspection and assessment shortcomings. However, the workplan describes leaving certain lead hazards in place, using interim control measures to control the hazards. Thus, it is necessary to ensure that the investigation of lead and other hazards has been proper and complete and that proposed control strategies are appropriate.

Francis Collins
Dutch Boy Studios
December 31, 1996
Page 2 of 2

In Attachment A, I have outlined the concerns and issues that emerged from the latest report review. There may be other deficiencies that have escaped my attention. It is your responsibility to ensure that the work complies with the HUD protocols and is completed in a timely manner. You may contact me with any questions or comments at (510)567-6770.

Sincerely,



Pamela J. Evans
Senior Hazardous Materials Specialist

c: Jun Makashima, ACDEH
Gordon Coleman, ACDEH
Madhulla Logan, ACDEH
Ralph Ray, Alameda County Lead Poisoning Prevention Program
Bob Chambers, Alameda County District Attorney's Office
Leroy Griffin, Oakland Fire Department
Ed Warren, Dutch Boy Artists' Community
Chris 'Wabuzoh, Sequoia Environmental Consulting Services

Attachment A - Response to Lead Abatement/Control Workplan

In the summer and fall of 1996, Sequoia Environmental performed a lead-based paint survey of randomly selected units at 4701 San Leandro Street in Oakland. This survey was conducted in response to mandates issued from the Alameda County Health Care Services Agency, Environmental Protection Division, after a lead-poisoned child was found to live at the complex and lead contamination was confirmed to exist there.

Before this survey was conducted, Sequoia did a pilot survey on a small number of units this past summer. After reviewing this document, the County met with you and later provided you with a letter containing all required information from future lead-based paint surveys. You were required to conduct a survey (combination lead-based paint inspection/risk assessment) of some twenty-six studios using the HUD protocols for single-family dwellings. Our review of your report has found the following deficiencies:

- 1) **Inadequate number and specificity of floor plans** - The HUD Guidelines require inspectors to conduct a visual assessment of the dwelling/property. This is usually the first step of a survey. The product of a visual assessment is usually a drawing or floor plan of each of the individual units. No floor plans were provided for any of the units. The general site plan you provided with the report is not adequate for this purpose. A floor plan is important because: 1) it allows the inspector to survey rooms in a clockwise fashion, per the HUD protocols; (2) it enables inspectors to document sample locations; and (3) it helps readers follow and verify sample locations. I am requiring a floor plan for each unit, common area and exterior area surveyed. All sample locations do not need to be identified, but building components sampled, including windows, doors, closets, etc. must be identified (See item 8).

Additionally, the site plan is unclear. Clear boundaries between each building are not represented. Some units represented on the drawing are not numbered. Also, I have requested a number of times that you specify the number of units that are residential, but have not received this information from you. Therefore, I must assume that all units are or could be used residentially, and will expect your workplan to reflect this assumption.

- 2) **Unclear calibration check information** - Readings taken to check the calibration of the instrument appear at the end of each report. Although the readings are numbered and coded "Std," there is no explanation of which standards (NIST or manufacturer) were used and what their actual concentrations were. This information is essential to determine the deviation between the actual concentration of the standard and the XRF reading. Please provide clarification on this issue.

- 3) **Definition of "Actionable"** - It is assumed that the term "Actionable" identifies XRF readings above the HUD standard, 1.0 mg/cm². Is this correct? If not, please define the term.
- 4) **Inadequate risk information** - No assessment of the risk of exposure to lead posed by measured components is provided. This is essential to a risk assessment. Information about surface condition is provided, but does not indicate whether the risk for lead exposure is low, medium or high. An assessment of risk should list the component, its location, its paint condition, its accessibility, and its risk rating. This information is used to rank the lead hazards. The hazard ranking is used to determine which hazards need treatment and the appropriate lead hazard reduction option for that component. This information also allows readers to understand and verify the treatment options you select. I am requiring that the risk assessment component of the survey be completed and submitted by **January 27, 1996**.
- 5) **Incorrect number of readings** - In one instance, I found two readings for one component averaged with a single reading from a third, different component. Clearly, this is a deviation from HUD protocol and is unacceptable. Please review all readings to determine if similar mistakes exist and correct them.
- 6) **Poorly organized data** - The XRF readings for some units appear to be reported on a per room basis, but data for some rooms is separated and appear in two places. This makes it difficult to follow the inspection data. Following the HUD protocols, one would first do a visual assessment and a floor plan that identifies each room in a unit by number. The rooms are numbered in a clockwise fashion, so that the inspection will proceed in the same way. When taking XRF readings, all of the readings for one room are typically reported together. Please review the report and ensure that all data for each room are reported together. If there is a reasonable explanation for reporting the information differently from the HUD protocols, please state it and explain how the data are organized in a paragraph at the beginning of the report for each unit.
- 7) **Paint condition assessment** - A review of your report reveals that almost all surfaces are in "Fair" condition. HUD defines "Fair" condition as a function of component surface area. For exterior components of large surface area, a "Fair" rating would be assigned to deteriorated paint over ten square feet or less of the component. For interior components of large surface area, a "Fair" rating would be assigned to deteriorated paint over two square feet or less. For exterior and interior components of small surface area, a "Fair" rating would be assigned to deteriorated paint over ten percent or less of the total surface area of the component. Please ensure that these definitions have been applied correctly.
- 8) **Inadequate number of components tested per room** - The HUD protocol requires that "all painted building components, including those that are stained, shellacked, varnished, coated, or covered with wallpaper" be inventoried and tested. If in the same

room, painted surfaces appear to be the same color and made of the same substrate, only one representative component needs to be tested. For each room, it is expected that the following components be tested: door; door casing; door jamb, wall; ceiling (if painted); window sash; window sill; window jamb; window well; window casing; baseboard; closet shelf support; closet shelf; closet walls; and closet door components (if not similar to entry door). In many instances, readings are provided for a small portion of this list of components for each room. For example, I have not found any readings for window wells, yet I know from personal observation that some exist. This could mean that the components exist, but were omitted during testing or that the components do not exist. If certain components do not exist, the report should state so. Such information may also be clarified by drawings, if detail permits. As the report stands, I am unable to determine what components are present in each room and whether all of them have been sampled by XRF. Please correct this oversight for each room.

- 9) **Irregular XRF readings** - In some cases, what appears to be single calibration check readings arise in the midst of XRF data, instead of at the end of the report. The validity, purpose, and location of such readings are unclear. Please clarify why these readings appear and whether or not they belong there. Also, there are instances of a wide range of readings for the same component. For example: 1) readings for a window sash (Bldg. 8, Studio 46) range from 1.7 to 9.1 mg/cm²; and (2) readings for a floor (Bldg. 8, Studio 46) range from 0.0 to 7.3 mg/cm². It is difficult to understand how such a wide variation in readings can occur on the same component. This suggests that the XRF may have been malfunctioning. Please explain.
- 10) **No photo documentation** - No photographs of sampled surfaces are provided. Photographs are helpful in documenting the existence and condition of a component. All sampled components need not be photographed, but wide-angle photographs of the unit and the most flagrant hazards are required.
- 11) **Discrepancy between structure distribution reports and total readings** - At the end of each report, the total number of readings does not add-up to the "Inspection totals" in the structure distribution. Please explain this discrepancy. Also, no inconclusive readings were found. Please explain. Also, no substrate correction readings were taken. Please explain.

Mad hulla - Your copy
Pam



SEQUOIA ENVIRONMENTAL
Consulting Services

1111 Aladdin Ave., Suite B
San Leandro, CA 94577
(510) 614-1900
Fax (510) 614-2923

September 20, 1996

Ms. Pamela J. Evans
Senior Hazardous Materials Specialist
Department of Environmental Health
Alameda County Health Care Agency
1131 Harbor Bay Parkway
Alameda, CA 94502

Re: Lead-Based Paint Inspection & Risk Assessment
4701 San Leandro Street
Oakland, California

Dear Ms. Evans:

This letter is to familiarize you with Mr. James Ratti's experience in performing lead-based paint inspection and risk assessment using HUD guidelines.

Mr. Ratti has been a DHS certified lead inspector and risk assessor, Number 1316. He has completed numerous lead-based paint inspections on single and multi-unit buildings.

A list of references is enclosed for your convenience. In addition to those on the reference list, he has completed six or seven inspections in San Joaquin County under the supervision of Mr. Bruce Askanas, R.E.H.S., 209 -468-0331. Mr. Ratti is a west coast representative for the RMD, XRF manufacturing company of Watertown, Massachusetts.

Please feel free to call if you require additional information.

Sincerely,

Chris 'Wabuzoh
Senior Geologist
Lead Inspector/Assessor 11957
Registered Environmental Assessor #02842

Enclosure

MR. JAMES RATTI PROJECT EXPERIENCE

Gottlieb Construction Company
164 Evelyn Way
San Francisco, CA 94127
Contact Mr. Andrew Gottlieb
Phone Number 415-665-6265

Performed lead-based paint inspection and risk assessment prior to start of remodeling project.

General Atlantic Properties
501 Second Street, Suite 710
San Francisco, CA 94107
Contact Mr. Michael Karasik
Phone Number 415-777-4494

Performed lead-based paint inspections on residential and commercial properties prior to sale or purchase.

Radiation Monitoring Devices, Inc.
44 Hunt Street
Watertown, Mass 02172
Contact Mr. Jacob H. Paster
Phone Number 617-926-1167

Company west coast representative and performs the use of XRF training for applicants in the west coast of United States.

Caritas Management Corporation
1358 Valencia Street
San Francisco, CA 94110
Contact Deborah A. Madaris
Phone Number 415-647-7191

Ecumenical Association for Housing
2169 East Francisco Blvd., Suite B
San Rafael, CA 94901
Contact Ms. Jill Minus, project manager
Mr. Ronnie L. Warner, project manager

Performed a limited risk assessment and lead test at Winery Apartments, Fresno, California.
Performed lead-based inspection at Hamilton Air Force Base, Novato, California.

Mid Peninsula Housing Coalition
658 Bair Island Road, Suite 300
Redwood City, CA 94063
Contact Ms. Holly Babe Faust
Phone Number 415-299-8000

Performed lead-based paint inspection of 20 units at Mountain View, California.

IHI Environmental
Berkeley, California
Contact Mr. David McGrath

Performed lead-based paint inspection of Travis Air Force Base VOQ's.



September 13, 1996

Francis Collins
6050 Hollis St.
Emeryville CA 94608

DEPARTMENT OF ENVIRONMENTAL HEALTH
1131 Harbor Bay Parkway
Alameda, CA 94502-6577
(510) 567-6777

**RE: Dutch Boy Studios - Lead Based Paint Inspection and Risk Assessment
Workplan (9/9/96)**

Dear Mr. Collins:

I have the following questions and comments on the workplan:

RESIDENTIAL LEAD INSPECTION/ASSESSMENT:

Site Background section: It appears that the buildings contain about 50-55 units. Please confirm the total number of units and specify the number of units currently and potentially used as residences.

Sampling Plan section: In an earlier report, your consultants recommended using HUD Guidelines for Five or More Dwellings That Are Not Similar, based on their observation that "buildings and the spaces are not all similar in both construction and occupancy" (June 14, 1996). In the current plan, they recommend the use of protocols for multi-family units. I am not convinced that the multi-family protocol is appropriate. Today I spoke with Chris 'Wabuzoh, who agreed that three XRF readings per building component would be taken and averaged, per the "Not Similar" protocol, instead of one reading, per the "multi-family" protocol.

The number of units selected for inspection/risk assessment purposes is acceptable to this office. Are all of the units selected live/work units, or do they have other uses? Certain units (27 and 56) were identified by their tenants as at least receiving occasional child visitors. These have not been tested in past studies and are not included in the list of units to be inspected/assessed. Please include these units in the testing. You may substitute them for other units not frequented by children.

Section 3.1, page 4, states "Upon completion of these target areas, random units will be selected based on similarity of construction and surface coatings". What are the units being selected for?

Soil Sampling section: It's not clear whether you intend to take singular or composite samples from dripline and other soil areas. Composite sampling of dripline areas is allowed by HUD and would be acceptable to this office. Other types of soil samples can be

Francis Collins
Dutch Boy Studios
September 13, 1996
Page 2 of 3

composited where feasible also. However, isolated areas that can not be grouped with other bare soil areas need to be sampled and tested singularly.

Sampling Equipment section: Please clarify whether a "performance work sheet" is the same as a performance characteristics sheet. The performance characteristics sheet for the equipment gives instructions for substrate correction and instrument calibration.

The consultant must be able to show written documentation of a medical surveillance, respiratory protection and safety programs for employees using the XRF equipment. This applies to **employees** of any companies contracting or subcontracting for the inspection/assessment.

Project Report section: The project report, according to HUD Guidelines, must include risk characterization and cost estimate components. While Alameda County does not require detailed cost information, you, as the owner certainly will. The risk characterization report needs to include information on whether a sampled component poses a high, moderate or low risk of lead exposure. The consultant needs to present a basis for the characterization scheme.

General Comments: In describing work to be done, the consultant frequently uses the word "should". (i.e., page 3, section 3.1 " . . . all similar and *should* be assessed as per HUD . . .). My acceptance of this work plan is made on the basis that the word "should" be replaced by the word "will". Please inform me of any changes to the work plan that you and the consultant may have agreed to. I understand that Mark Bradshaw is no longer associated with this project and that Jim Ratti has joined it. Please provide a written summary of Mr. Ratti's experience conducting lead-based paint inspections and risk assessments using HUD protocols in multi-family and/or scattered site dwellings.

ENVIRONMENTAL CONTAMINATION INVESTIGATION AND REMEDIATION:

Please respond in writing to the following issues **within 20 days**.

Environmental Phase I Assessment - This office has not heard from you regarding a phase I assessment for the site. Since it is known that the site was used for paint manufacturing, all products associated but not limited to this process, such as pigments, solvents, additives, dyes, etc. should specifically be identified.

Sampling Strategy - Based on the chemicals identified in the phase I assessment and during previous investigations, you must include a sampling strategy for defining the vertical and/or lateral extent of contamination in your written site assessment plan. Describe the number of

Francis Collins
Dutch Boy Studios
September 13, 1996
Page 3 of 3

samples to be collected for each of the chemicals identified, the different depths at which samples are to be collected, and the sample locations which should be referenced in a sample location map. To adequately characterize the site, use judgement sampling (based on historical use) in areas of known historical use coupled with random sampling in the rest of the areas.

Site Remediation: Based on the results of the investigation, submit a corrective action plan to this Department with the goal of reducing the risk on the site to an acceptable level. State the clean up levels for each chemical of concern.

Underground Storage Tank Remediation: Please inform this office of the results of your analysis of the soil pile associated with the tank removal and of your plans for disposal.

You may contact me at (510)567-6770 with any questions or comments regarding this letter.

Sincerely,



Pamela J. Evans
Senior Hazardous Materials Specialist

c: Jun Makashima, ACDEH
Gordon Coleman, ACDEH
Madhulla Logan, ACDEH
Ralph Ray, Alameda County Lead Poisoning Prevention Program
Britt Johnson, Oakland Fire Department
Ed Warren, Dutch Boy Artists' Community
Chris 'Wabuzoh, Sequoia Environmental Consulting Services

Pam,

I have reviewed the document submitted by Sequoia, dated September 9, 1996 and these are my thoughts on it:

1. No mention has been made of conducting a phase I assessment that we requested in our previous letter. We need that to identify the chemical of concerns based on past use.
2. Exterior soil sampling- The report mentions about collecting soil samples in areas where children are likely to have contact, but I would imagine any surface area outside in the ground is accessible to a child. So I really don't understand what this means. Also, we need a sample location map for both judgement sampling and for random sampling, which was not submitted with the report. The chemicals of concern that are going to be samples have not been mentioned i.e. apart from lead. How did they assume that lead is the only chemical of concern.
3. Not just the lateral extent of contamination, but also the vertical extent has to be determined or atleast the workplan should state that if the surface samples are dirty then the deeper samples will be analyzed. No mention has been made of this.
4. Cleanup Levels to be used should be clearly mentioned in the workplan for each chemical.
5. With regards to the underground storage tanks, they should clearly mention how they are going to respond to my previous request. They have not mentioned anything about it.

Madhulla



August 21, 1996

Francis Collins
6050 Hollis St.
Emeryville CA 94608

DEPARTMENT OF ENVIRONMENTAL HEALTH
1131 Harbor Bay Parkway
Alameda, CA 94502-6577
(510) 567-6777

RE: Dutch Boy Studios Investigation

Dear Mr. Collins:

On August 20, 1996, I met with a group of Dutch Boy Studios tenants. Below I have listed environmental contamination concerns as expressed by them about the property. Please consider these concerns in the course of the investigation.

1. Unit #23 (aka "the dog house"). Lead was received here and possibly mixed with something else for the manufacturing process.
2. Between units 42 and 44, a chute used to exist to carry lead bearing powder from one place to another. A great deal of lead contaminated dust is associated with this area.
3. Building containing units 20, 21, 22. Tenants believe processes took place in this building in which lead was very concentrated. The roof and blower equipment on the roof are believed to be heavily contaminated with lead.
4. Unloading area at rear, center of property (near wooden vertical tanks). Possible spills from past work in this area, lead and other contaminants a concern.
5. Building located on adjacent parcel to the south. Was NL Industries' office, later used by a towing company. A few years ago this building was sand blasted. Tenants are concerned about it as a source of lead dust.
6. Dust on, around building components and grounds. Tenants concerned about lead, other contaminants, in accumulated dust in both accessible areas (that can be cleaned by them) and inaccessible spots (like beams, ceilings, high walls).
7. Reddish "ooze" from indoor pipes, units 35 and 37. Tenants concerned about lead, other contaminants inside pipes.
8. Underground tanks. Tenants believe underground tanks remain in the center courtyard (parking area).
9. Railroad tracks. Tenants are concerned about contamination from past loading/unloading operations, as well as any associated with past track maintenance.
10. Above ground wooden tanks at rear, center of property. Tenants concerned about past uses of these.
11. Barrels containing waste oil by unit 20. Tenants say these have been sitting for a long time and have begun to leak.

NOTE: These barrels were probably the same ones I noted during my March/April visits.
Please arrange for disposal as soon as possible.

Francis Collins
Dutch Boy Studios
August 21, 1996
Page 2 of 2

12. Asbestos containing roofing material. Suspect units include 10, 11, 12, 13, 14, 25, 26, and 27.
13. A waste oil transporter operated at the site about 10 years ago. This operation may have contributed to contamination.
14. A storm drain catch basin in the center of the complex may contain high levels of lead and other contaminants that have been picked up by rain water and carried there. This drain is located in the driveway between units 20, 21 and 22 and the building with units 42 and 44 in it.
15. The basement of the rear right hand building (containing unit 49) often becomes flooded. People are concerned that contaminants from groundwater and surface runoff water may have deposited and become concentrated here.

Please consider this letter informational in nature. This site has a complex history and a large number of tenants potentially affected by the investigation and clean up. Thus, I believe that forwarding to you this list of tenant concerns is in the best interests of all concerned with the site. You may contact me with any questions or comments regarding this letter at (510)567-6770. You may also contact Ed Warren with the tenants' association for further information.

Sincerely,



Pamela J. Evans
Senior Hazardous Materials Specialist

c: Jun Makashima, ACDEH
Gordon Coleman, ACDEH
Madhulla Logan, ACDEH
Gil Jensen, Alameda County District Attorney
Britt Johnson, Oakland Fire Department
Charles Kennedy, Oakland Office of Planning and Building
Ed Warren, Dutch Boy Artists' Community
Chris 'Wabuzoh, Sequoia Environmental Consulting Services
Mark Bradshaw, Consultant
Paul Dezurick, Esq.
Marcus Martin, Esq.

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



Madhulla
Logan

RAFAT A. SHAHID, DIRECTOR

August 8, 1996

Francis Collins
6050 Hollis St.
Emeryville CA 94608

Jay Young, Environmental Engineer
NL Industries
Wycoffs Mill Road
Hightstown NJ 08520

DEPARTMENT OF ENVIRONMENTAL HEALTH
1131 Harbor Bay Parkway
Alameda, CA 94502-6577
(510) 567-6777

RE: Requirements for Residential and Environmental Investigation and Remediation at Dutch Boy Studios, 4701 San Leandro Blvd., Oakland

Gentlemen:

I am sending information as a follow-up to the panel review held July 24, 1996. The panel was held to address residential lead and environmental contamination issues concerning Dutch Boy Studios. I am working with Madhulla Logan of this office to coordinate oversight of the environmental and residential investigation and clean-up work at your property. The purpose of this letter is to inform you of the County's minimum requirements for remediation and for contractor qualifications. This letter also contains timelines for remedial action. Based on recent progress in investigating the site, I will request that the September panel review be put over to October 2, 1996.

It is my understanding that NL Industries and Francis Collins are cooperating financially in complying with the lead investigation and remediation. Francis Collins has submitted certain documents and information to the County. The purpose of this letter is to supply responsible parties with a complete description of required actions and documents.

The \$3,000.00 deposit to this office for case oversight has been depleted. Please submit another deposit for this amount. Your check should be made payable to Alameda County Environmental Protection.

RESIDENTIAL LEAD CLEAN-UP PROCEDURES AND STANDARDS:

1. **By August 12, 1996** the Department expects to receive a written pilot project report including a written plan for a site inspection and site assessment. **By August 30, 1996** we expect the inspection and assessment to have been completed. The inspection shall qualify and quantify the nature and extent of existing lead hazards in and on building components throughout the *entire* interior and exterior of the residential portion of the structure (particularly friction or contact points and locations likely to generate or

capture dust as a result of normal operation) and bare soil surrounding the structure. You may be required to inspect neighboring properties suspected of being contaminated as a result of actions occurring at the subject property. You also must provide a site assessment of hazards identified as a result of the inspection. The inspection and site assessment shall conform to procedures taught in State certified courses. The standards by which lead hazards are defined shall be at least as stringent as those included in the attached definitions. The inspection and site assessment shall be done by a person who is certified by the State of California as a Lead-Related Construction Inspector/Assessor.

2. Within **30 days** of the completion of the site inspection and assessment, a written **proposed project design** in which lead hazards, identified as a result of the inspection and site assessment, are targeted for reduction. The proposed design shall clearly state the selected method of reduction and specific practices and procedures intended to be used in reducing targeted hazards. The proposed design shall explicitly reveal engineering and administrative controls intended to be used to ensure that nearby properties, unprotected bystanders and *occupants and their possessions* are protected from potential releases (temporary relocation of occupants and their possessions may be needed). **The proposed design shall explicitly list (by drawing and written description) any hazards the violator does not plan to reduce and why.**

3. Within **30 days** of the completion of the site inspection and assessment, a written **proposed operations and maintenance program (O&M plan)** explaining how hazards *intended to remain* will be controlled to minimize the risk of lead exposure for occupants during the remaining period of tenancy or future tenants. The proposed O&M plan shall require a visual inspection at unit turnover and annually (findings shall be recorded in writing) to ensure that:
 - ▶ Coatings and substrates of exposed lead hazards are maintained intact;
 - ▶ Interim controls for lead hazards found in soil remain intact;
 - ▶ Paint stabilization (enclosure or encapsulation) shall remain intact;
 - ▶ Doors and windows are operating correctly;
 - ▶ No visible dust at friction and contact points is present.

No certification is required for persons conducting periodic inspections; however, written records shall be retained. The violator/property owner has an obligation to *promptly and safely* remedy any deficiencies detected or those that should have been detected as a result of periodic inspection. The remedy shall reduce the risk of exposure to lead for occupants for the remaining period of tenancy or future tenants.

4. **Review Process**

The County shall have **30 calendar days** to *review* materials submitted by the owner and *specify* required modifications in writing, if any. All materials submitted by the violator shall contain legible descriptions and illustrations. Should lead hazards that warrant action be omitted from the planned reduction or deficiencies in the inspection, site assessment, project design, or O&M plan be identified, they and any corrective actions

required by the County shall be disclosed to the violator in the written itemization. You must comply with County-issued modifications.

You will then have **15 calendar days** to *amend* the originally submitted materials to reflect compliance with all County-mandated modifications and *return* the materials for approval to the County. The property owner, or a designate with the authority to execute contracts on behalf of the violator/property owner, shall sign the proposed design and O&M plan to indicate that: 1) the originally submitted materials have been amended to comply with all County modifications submitted in writing; and (2) the property owner consents to completing the work in accordance with all County mandates and deadlines.

After receiving the *modified and signed* design and O&M plan, County personnel shall have **30 calendar days** to review the materials and make further corrections or approve the project design and O&M plan. Failure to amend proposed materials in accordance with County requirements submitted in writing does not release property owners from an obligation to comply with all modifications submitted by the County in writing. Unjustified delays, resistance to County mandates, and/or noncompliance with County deadlines shall be considered violations and may warrant enforcement actions, citations, or fines.

5. **County Acceptance**

Approval of the materials shall be indicated by the signature of a County designate to the proposed materials. **The County shall accept no responsibility or liability for mandates, recommendations or outcomes of the owner's actions or actions of those he contracts to do the work.** County changes to all documents submitted by the violator, and all original documents bearing signatures shall be retained as County records. Copies shall be provided to you.

6. **Closure**

Once the County has accepted the proposed project design and the operations and maintenance program plans, you will have **90 days** from the date of acceptance to complete the abatement.

You must provide documentation that measurements (physical samples and/or XRF readings) collected from or on surfaces proximal to or affected by the lead hazard

reduction are below the applicable standards attached. Samples shall be collected *after the reduction has occurred*. Additionally, you must provide documentation that lead hazards targeted for removal have, in fact, been removed. All post-lead hazard reduction sampling strategies shall be approved by the County prior to implementation. Post-lead hazard reduction samples shall be collected no later than 48 hours after work has ceased. The dates and times that lead hazard reduction work is deemed completed and post-lead hazard reduction sampling begins shall be recorded. The County shall not release a property owner from the responsibility to comply without review and approval of the post-lead hazard reduction sampling strategy and submission of results and documentation indicating compliance with attached standards. The property owner shall not lease the subject property legally, until the County has issued a statement confirming compliance with enforcement mandates. Further requirements may be imposed by the County, if conditions change or health hazards posed by lead-containing materials are identified. The party conducting clearance testing and/or inspections shall not have a financial relationship with the contractor who does the lead hazard reduction work. The party who conducts clearance testing and/or inspections shall be qualified (one year of experience in environmental sampling and State certification as a Lead-Related Construction Inspector/Assessor, minimally).

DISCIPLINE:

Property owners are subject to enforcement actions, fines and/or litigation, if it is determined that: 1) misrepresentations about addressing lead hazards have been made; or (2) lead hazards previously identified at the same property are involved in subsequent lead poisoning cases.

WARNING! SINCE THIS PROPERTY IS SUBSTANDARD DUE TO LEAD CONTAMINATION, PURSUANT TO SECTIONS 17274 AND 24436.5 OF THE REVENUE AND TAXATION CODE, ANY TAX DEDUCTION FOR INTEREST, TAXES, DEPRECIATION, OR AMORTIZATION PAID OR INCURRED IN THE TAXABLE YEAR IS ILLEGAL!

See Attachment 1 for Definitions and Clean-Up Standards for Residential Lead.

RESIDENTIAL LEAD CONTRACTOR STANDARDS:

Inspections and Risk Assessments - Effective lead clean-ups start with an inspection and/or risk

assessment in which hazards are identified, risk levels are determined, and strategies for risk reduction are formed. The following standards are meant to ensure that the contractor who does the work is competent, gathers good data, generates useful reports and interacts effectively with the agencies. Alameda County requires that the inspection contractor meet the following criteria:

1. Must be certified by the State of California as a Lead-Related Construction Inspector/Assessor.
2. Has at least a year of experience conducting lead-based paint inspections and risk assessments using protocols found in the most recent Housing and Urban Development Guidelines.
3. Has experience doing lead inspection/assessment at multi-family dwellings.
4. Has proper insurance coverage, including Professional Liability (Errors and Omissions) and Workers' Compensation.
5. Can provide proof of manufacturer certification for the XRF equipment used to detect lead. XRF measurements must be K-shell readings. Data must be stored in DBF format on magnetic disc.
6. Has a current radioactive materials license.
7. Has a Radiation Safety Program in addition to all other health and safety related programs mandated by federal, state and/or local regulations.
8. Uses a set of standard operating procedures, including currently implemented QA/QC protocols.
9. Uses only AIHA-certified laboratories for analysis of paint, dust or soil samples.

The proposed project design shall be done by a person who is certified by the State of California as a Lead-Related Construction Project Designer. All lead hazard reduction work shall be done by entities that are properly licensed and certified by the State of California. At least one worker at the job site shall be certified as a Lead-Related Construction Supervisor. All others shall be certified as Lead-Related Construction Workers, minimally. Guidelines for worker protection and other compliance issues are currently defined per Fed-OSHA (29 CFR 1926.62). All work shall comply with applicable federal, state, and local regulations, laws, and ordinances. Any solid or liquid hazardous wastes generated as a result of lead hazard reduction shall be handled as hazardous waste in accordance with Title 22 CCR Section 66261.

Francis Collins
NL Industries
August 8, 1996
Page 6 of 9

ENVIRONMENTAL CONTAMINATION INVESTIGATION AND REMEDIATION:

Environmental Phase I Assessment - The phase I environmental site assessment, dated March 12, 1991, prepared by RGA does not adequately describe the historical use of the site with regards to the potential chemicals that may have been used at the site. Hence a phase I assessment should be submitted to this Department, which discusses the past historical use of the property and identifies all the potential chemicals that may have been used at the property. Since it is known that the site was used for paint manufacturing, all products associated but not limited to this process, such as pigments, solvents, additives, dyes, etc. should specifically be identified.

Site Investigation - The site investigation should specifically be conducted with the goal of qualifying and quantifying any chemical hazards on painted or varnished building components throughout the entire interior and exterior of the residential portion of the structure, and bare soil surrounding the structure, including the contamination related to the former underground storage tanks, which was identified during previous investigations.

Sampling Strategy - Based on the chemicals identified in the phase I assessment and during previous investigations, a sampling strategy for defining the vertical and/or lateral extent of contamination in the residences, in the bare soil, and around the former underground storage tank should be included in your written site assessment plan. This plan should mention the number of samples to be collected for each of the chemicals identified, the different depths at which samples are to be collected, the sample locations which should be referenced in a sample location map, the sampling methodology and equipment that will be used for sampling, and the sample preservation method. The sampling plan for the residences should follow the HUD guidelines. For sampling bare soil, a justification should be included for selected sampling methods, and procedures. To adequately characterize the site, this Department recommends that judgement sampling (based on historical use) be done in areas of known historical use coupled with random sampling in the rest of the areas. Also, provisions should be made to conduct leachate testing using the WET (waste extraction test) method or the EPA method 1312, if needed, in selected soil samples based on the concentrations and depth below ground surface.

Remediation - Based on the results of the investigation, a corrective action plan should be submitted to this Department with the goal of reducing the risk on the site to an acceptable level. For lead in bare soils, the cleanup level of 400 ppm for a residential scenario should be used and for wipe samples, the HUD standard should be used. For other chemicals, the EPA's (Environmental Protection Agency) Preliminary Remediation Goals (PRGs) for a residential scenario can be used as the cleanup level or a site specific peer reviewed risk

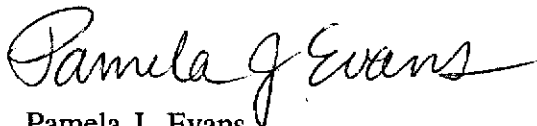
Francis Collins
NL Industries
August 8, 1996
Page 7 of 9

assessment methodology can be used to determine the cleanup levels. .

Qualifications - The workplan and the investigation report should be signed off by a registered professional such as a Registered Professional Engineer (P.E.) or a Registered Geologist (R.G.).

You may contact me at (510)567-6770 with any questions or comments regarding this letter.

Sincerely,



Pamela J. Evans
Senior Hazardous Materials Specialist

c: Jun Makashima, ACDEH
Gordon Coleman, ACDEH
Madhulla Logan, ACDEH
Gil Jensen, Alameda County District Attorney
Ralph Ray, Alameda County Lead Poisoning Prevention Program
Patrick Tang, Oakland City Attorney's Office
Britt Johnson, Oakland Fire Department
Charles Kennedy, Oakland Office of Planning and Building
J. Landis Martin, NL Industries
Ed Warren, Dutch Boy Artists' Community
Chris 'Wabuzoh, Sequoia Environmental Consulting Services
Mark Bradshaw, Consultant
Paul Dezurick, Esq.
Marcus Martin, Esq.

ATTACHMENT 1

Definitions and Clean-Up Standards for Residential Lead:

Inspection a surface by surface investigation to determine the presence of lead hazards.

Site Assessment an on-site investigation to determine and report the existence, nature, severity, and location of lead hazards including: 1) information gathering regarding the age and history of the housing and occupancy by children under age 6; (2) visual inspection; (3) limited wipe sampling or other environmental sampling techniques; (4) provision of a report explaining the results of the investigation.

Project Design a written description outlining and detailing the actions one intends to take to reduce lead hazards.

Lead hazard reduction actions or measures that reduce or eliminate human exposure to lead hazards including interim controls and permanent abatement.

Lead Hazard any condition that causes exposure to lead from lead-containing dust, soil, or coating agent that is deteriorated or present in accessible surfaces, friction surfaces, or impact surfaces that would result in adverse human health effects. The following are County standards:

Paint and varnish is considered to contain excess lead and shall be abated, if analysis results are:

0.5% wgt or greater - Atomic Absorption Spectroscopy (AAS)
1.0 mg/cm² or greater - X-Ray Fluorimetry (XRF)*

* Because the standard approaches the limit of analytical sensitivity (LAS) of current XRF technology, only XRF measurements which are 1.6 mg/cm² or greater are considered lead-positive. Results equal or ranging between 0.4 mg/cm² and 1.6 mg/cm² are considered inconclusive and require confirmatory AAS analysis. Results less than 0.4 mg/cm² are considered lead-negative.

Francis Collins
NL Industries
August 8, 1996
Page 9 of 9

Soil is considered to contain excess lead and require lead hazard reduction, if analysis results are:

500 ppm or greater - Total Threshold Limit Concentration (TTLC)

If results are 5000 ppm or greater, permanent covering or removal is required.

Dust is considered to contain unacceptable levels of lead and lead hazard reduction is required, if AAS analysis results are equal to or greater than:

- 100 ug/ft² - floor
- 200 ug/ft² - baseboard
- 500 ug/ft² - window sill
- 500 ug/ft² - chair rail
- 800 ug/ft² - window well (exterior)

Note: Building components and surfaces for which no standards are provided may be sampled before and after lead hazard reductions. The purpose of such sampling is to show that a surface has been cleaned during the lead hazard reduction. In such cases, sample results obtained prior to lead hazard reductions shall be used as *background* results. Results from interior samples *collected in approximately the same locations after reduction*, shall be less than the comparable *background* result or less than 500 $\mu\text{g}/\text{ft}^2$, whichever is less.

Domestic Water Supply shall not contain lead in excess of 15 ppb (AAS analysis).

mg/cm² = milligrams per square centimeter
wt = by weight
ug/ft² = micrograms per square foot
ppm = parts per million = mg/kg
ppb = parts per billion

**OFFICE OF THE DISTRICT ATTORNEY AND CITY OF OAKLAND,
COMMUNITY AND ECONOMIC DEVELOPMENT AGENCY
AND THE ALAMEDA COUNTY HEALTH CARE SERVICES AGENCY,
DEPARTMENT OF ENVIRONMENTAL HEALTH,
ENVIRONMENTAL PROTECTION DIVISION**

IN RE THE PROPERTY KNOWN AS:

4701 SAN LEANDRO ST.
OAKLAND, CA 94601

NOTICE OF
PRE-REFERRAL AND
PRE-ENFORCEMENT
REVIEW PANEL

Notice is hereby given that upon the motion of the City of Oakland and the County of Alameda, Health Care Services Agency Department of Environmental Health and the City of Oakland, a REVIEW PANEL will convene on July 24, 1996 at 2 PM in the offices of the Alameda County Environmental Protection Division located at 1131 Harbor Bay Parkway, Alameda, CA 94502.

This REVIEW PANEL will convene for the purpose of determining legally responsible parties, and whether the following actions should be taken and/or findings should be made:

- 1) a) a determination of the parties responsible for the maintenance of a nuisance as well as appropriate conditions and requirements of a **LEGAL NOTICE TO REMOVE, DISCONTINUE, AND ABATE A NUISANCE** pursuant to California Code of Civil Procedure Section 731, Health and Safety Code Section 17980, and Penal Code Section 373a, caused by the existence of lead contamination at the above location;
- b) a determination pursuant to the laws of the State of California by said County of Alameda and the Office of the District Attorney of the terms and conditions of said **LEGAL NOTICE** and what actions will be required of said responsible parties to correct and abate said nuisance.
- 2) a) a determination whether as a result of the violations and/or conditions found to exist at the above named location, there is cause to believe that said responsible parties have generated, stored, treated, transported, or otherwise handled or may in the future generate, store, treat, transport, or otherwise handle hazardous substances, hazardous wastes, or hazardous materials, so as to make them hazardous wastes, and that there is therefore good cause for the issuance of a **Legal Request for the Furnishing and Transmittal of Information** pursuant to Health and Safety section 25185.6 and/ or good cause to issue an **Order to Conduct Monitoring, Testing, Analysis and Reporting** pursuant to Health and Safety Code Section 25187.1, including but not limited to:
 - (1) a workplan to address the methylene chloride contamination found on the reference property including but not limited to soil samples to be collected beneath the 2 concrete vaults. The samples should be analyzed for methylene chloride using the Toxicity Characteristics Leaching Procedure (TCLP) and the regular EPA 8010 analysis;
 - (2) all the concerned manifests or disposal receipts that document the disposal of the soil piles which were sampled on October 28, 1993. This sampling event was documented and submitted to this Department in a report dated November 19, 1993. If the soil has not been disposed, then information on the status of the soil that was excavated subsequent to the removal of the underground storage tank and vaults;

(3) a workplan defining the extent of Lead Contamination on the non-residential portions of the site and to address the future remediation and cleanup of all contamination identified.

b) the Alameda County Department of Environmental Health, Environmental Protection Division will make a finding of the extent of harm resulting from said violation(s), the nature and persistence of the violation, the length of time of the violation, the frequency of past violations, and any action taken to mitigate the violation in order to recommend to the Health Officer of Alameda county the appropriate civil penalty which may be assessed pursuant to California Health and Safety code.

WARNING! SINCE THIS PROPERTY IS SUBSTANDARD DUE TO LEAD CONTAMINATION, PURSUANT TO SECTIONS 17274 AND 24436.5 OF THE REVENUE AND TAXATION CODE, ANY TAX DEDUCTION FOR INTEREST, TAXES, DEPRECIATION, OR AMORTIZATION PAID OR INCURRED IN THE TAXABLE YEAR IS ILLEGAL!

The County of Alameda, Health Care Services Agency Department of Environmental Health and the City of Oakland have named and served notice of this REVIEW PANEL on the following persons and/or entities as having proposed responsibility for current ownership and/or operation, and/or past ownership and/or operation, and **BY THIS NOTICE ALL PARTIES NAMED HEREIN ARE INFORMED OF THE RIGHT TO APPEAR AND SHOW CAUSE, IF ANY THEY HAVE, FOR THE EXCLUSION OR INCLUSION OF ANY OF THE PARTIES, PARTIES IN INTEREST AND PROPERTIES NAMED HEREIN FROM SAID RESPONSIBILITY OR OBLIGATIONS:**

Francis Collins, an individual and
Catherine Collins, an individual
6050 Hollis St.
Emeryville, CA 94608

NL Industries, a New Jersey Corporation,
having done business as National Lead Company
J. Landis Martin, CEO
P.O. Box 4272
Houston, TX 77210

Donald V. Clair,
having done business as:
Clair Marine Corp., a California Corporation
4169 High Ridge Pl
Castro Valley, CA 94546

Dated: _____, 1996

S/Alameda County Health Officer
S/Program Manager City of Oakland

By S/Pamela Evans
Pamela J. Evans
Senior Hazardous Materials Specialist
Department of Environmental Health
(510) 567-6770



July 22, 1996

Ms. Pamela J. Evans
Senior Hazardous Materials Specialist
Department of Environmental Health
Alameda County Health Services
1131 Harbor Bay Parkway
Alameda, CA 94502

Re: Site Risk Assessment and
Lead Inspection
4701 San Leandro Street
Oakland, California

Dear Ms. Evans:

As we discussed, Sequoia Environmental and Bradshaw Environmental have performed the pilot lead sampling at 4701 San Leandro Street in Oakland. The inspection was performed on July 18 to 21, 1996. Four units (#s 15, 18, 31 and 36) and the stairways were inspected.

Preliminary inspection was performed using X-Ray Florescence (XRF) device. Chip samples were collected from surfaces when XRF reading indicated inconclusive. The chip samples were sent to Micro Analytical in Emeryville for laboratory analyses.

Due to time constrain, information gathered during the pilot project will be presented to you during the meeting scheduled for July 24, 1996. At the completion of laboratory analyses, report on the preliminary sampling will be prepared. The draft report will contain XRF readings, analytical results and samples' locations.

The completed pilot project report will be submitted on August 5, 1996. On the basis of the pilot project results, a comprehensive workplan for the project including outside soil sampling will be prepared. The scheduled date for completing the comprehensive workplan will be August 30, 1996.

Disposal plans for the excavated soil at the subject site are been worked out with National Lead. Profiling of the soil is scheduled for July 31, 1996. Our experiences in performing lead projects are diverse. Sequoia Environmental as a

subcontractor (1994 to 1995) has performed lead inspection and assessment for E & J Environmental, a lead abatement company in San Francisco. The projects involved multi-family and single family units. Bradshaw Environmental has performed lead inspection and assessment of multi-family and single family units. Recent project included East Bay Municipal Urban District (EBMUD), Bradshaw Environmental was a subcontractor to Jems Environmental, the prime. Mr. Bradshaw is as needed instructor at University of California Extension Lead Program and a member of the San Francisco Childhood Lead Prevention Committee.

Please feel free to call if you have any question.

Sincerely,

A handwritten signature in cursive script that reads "Chris Wabuzoh".

Chris Wabuzoh
Senior Geologist
Registered Environmental Assessor

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



Pam Evans

RAFAT A. SHAHID, DIRECTOR

July 15, 1996

Francis Collins
6050 Hollis St.
Emeryville CA 94608

DEPARTMENT OF ENVIRONMENTAL HEALTH
1131 Harbor Bay Parkway
Alameda, CA 94502-6577
(510) 567-6777

**RE: Site Risk Assessment and Lead Inspection Workplan for
Dutch Boy Studios, 4701 San Leandro St., Oakland 94601**

Dear Mr. Collins:

I have reviewed the above referenced document dated June 14, 1996, prepared by Chris Wabuzoh of Sequoia Environmental Consulting Services and Mark Bradshaw, who is certified by the State to manage lead-related projects. This document seems to have been prepared in response to a request in my letter of May 15, 1996. I asked for a brief written description, by June 1, 1996, of contractor qualifications, the steps you intend to take to reduce the lead hazard at the subject property, and your timeline for carrying out the work. The document arrived at my office on June 24, 1996. Although it does not include a timeline, it is substantially what I expected to receive on June 1. Although Chris Wabuzoh informed me by telephone that the first required document would not be ready by June 1, I agreed to an extension to June 11, 1996 only.

The June 16 Workplan did not include specific information on planned sampling locations, but referenced current HUD Guidelines. Ultimately, I will evaluate the adequacy of your site assessment and inspection using HUD Guidelines when your report is submitted for these activities. Alternatively, I would be pleased to review a more detailed work plan prior to the work being completed. **Note that a written report of the lead inspection and site assessment was to have been submitted July 1, 1996 and is now overdue.** The inspection and site assessment report must qualify and quantify the nature and extent of existing lead hazards as described in my May letter.

I have the following questions and comments on the June 16 Workplan. This request for information should not be construed as a reason to stop any work in progress at Dutch Boy Studios.

- 1) **Site Background:** Tenants of the buildings use them as residences, in some cases, as well as the other uses mentioned.

2) **Use of HUD Guidelines for Assessments of Five or More Dwellings that Are Not Similar and for Soil Sampling:** Please specify the number of residences (or potential residences) that exist. The workplan states that you plan to assess 25% of these. The HUD Guidelines state that 25% is a minimum number, and that additional assessment may be needed until a "clear pattern" of lead contamination emerges. Also, the likelihood of interior remodeling seems high at Dutch Boy Studios. Also, the City of Oakland is likely to require upgrading of both residential and work uses, which could require disturbance of lead coated surfaces. For all of these reasons, you should consider a more comprehensive assessment and sampling plan.

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3) **Sampling of Soil and Building Surfaces:** In evaluating your recent workplan, I would also find it useful to know the proposed number, location and type of sample you plan to take, both inside the buildings and from the soils. I would prefer a site diagram, showing proposed sampling locations and contaminants to be tested for, along with a narrative description. Also, aside from "high risk" soil, all areas on the parcel that are not densely vegetated year round should be included in your representative sampling plan.

still
need

Regarding both soil and structures, it is acceptable to this office for you to evaluate "high risk" areas (those frequented by children or otherwise more likely to impact human health) first. However, the workplan does not clearly state whether you plan to inspect, assess and remediate all "high risk" areas before beginning any work in other areas, or whether these two areas will be worked on simultaneously. For this reason, and others, a timeline of your proposed activities would be helpful.

describe
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4) **Contractor Qualifications:** Please provide the following information regarding Mark Bradshaw's qualifications and/or for any Sequoia Environmental staff who may be working directly on the lead remediation project:

No new
info

a) Experience with lead remediation projects involving multi-family, scattered-site single family, and/or five or more dwellings that are not similar protocols.

b) Types of insurance coverage (especially Professional Liability and Workers' Compensation) your consultants have.

Francis Collins
Dutch Boy Studios
July 15, 1996
Page 3 of 3

c) Availability of current radioactive materials license and a Radiation Safety Program by your consultant(s).

d) Standard Operating Procedures used by your consultant(s) to do lead work.

As you may be aware, a consultant representing NL Industries has told me that NL is interested in performing lead remediation work at Dutch Boy Studios. I wish to encourage any responsible parties to contribute to the investigation and remediation of the lead contamination at this site. However, any such work needs to be coordinated among responsible parties.

Your \$3,000.00 deposit to this office for case oversight has been depleted. Please submit another deposit for this amount. Your check should be made payable to Alameda County Environmental Protection.

Please provide the requested information in writing on or before July 24, 1996, 2:00 p.m., when the Pre-Enforcement Panel Review is scheduled. While your consultants are welcome to accompany you to the meeting, they are not considered by this office as your substitutes or representatives for purposes of responding to the Notice. You may contact me with any questions about this letter, the workplan, or the upcoming Panel Review at (510)567-6770.

Sincerely,



Pamela J. Evans
Senior Hazardous Materials Specialist

- c: Gordon Coleman, ACEPD
Gil Jensen, Alameda County District Attorney
Ralph Ray, Alameda County Lead Poisoning Prevention Program
Julie Twichell, ACLPPP
Britt Johnson, Oakland Fire Department
Patrick Tang, Oakland City Attorney's Office
Charles Kennedy, Oakland Office of Planning and Building
J. Landis Martin, NL Industries
Ed Warren, Dutch Boy Artists' Community
Chris Wabazon, Sequoia

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



RAFAT A. SHAHID, DIRECTOR

May 17, 1996

Francis Collins
6050 Hollis St.
Emeryville CA 94608

DEPARTMENT OF ENVIRONMENTAL HEALTH
1131 Harbor Bay Parkway
Alameda, CA 94502-6577
(510) 567-6777

**RE: Requirements for Residential Lead Clean-up Work at
4701 San Leandro Blvd., Oakland**

Dear Mr. Collins:

I am sending information as a follow-up to the multi-agency meeting held April 16, 1996 to address issues concerning the above referenced property. I am working with Madhulla Logan of this office to coordinate oversight of the environmental and residential investigation and clean-up work at your property. The purpose of this letter is to inform you of the County's minimum requirements for contractor qualifications, our clean-up procedures and standards, and compliance timelines concerning residential lead contamination.

LEAD CONTRACTOR STANDARDS:

Inspections and Risk Assessments - Effective lead clean-ups start with an inspection and/or risk assessment in which hazards are identified, risk levels are determined, and strategies for risk reduction are formed. The following standards are meant to ensure that the contractor who does the work is competent, gathers good data, generates useful reports and interacts effectively with the agencies. Alameda County requires that the inspection contractor meet the following criteria:

1. Must be certified by the State of California as a Lead-Related Construction Inspector/Assessor.
2. Has at least a year of experience conducting lead-based paint inspections and risk assessments using protocols found in the most recent Housing and Urban Development Guidelines.
3. Has experience doing lead inspection/assessment at multi-family dwellings.
4. Has proper insurance coverage, including Professional Liability (Errors and Omissions) and Workers' Compensation.
5. Can provide proof of manufacturer certification for the XRF equipment used to detect lead. XRF measurements must be K-shell readings. Data must be stored in DBF format on magnetic disc.
6. Has a current radioactive materials license.
7. Has a Radiation Safety Program in addition to all other health and safety related programs mandated by federal, state and/or local regulations.
8. Uses a set of standard operating procedures, including

currently implemented QA/QC protocols.

9. Uses only AIHA-certified laboratories for analysis of paint, dust or soil samples.

Lead Abatement and Control - The proposed project design shall be done by a person who is certified by the State of California as a Lead-Related Construction Project Designer. All lead hazard reduction work shall be done by entities that are properly licensed and certified by the State of California. At least one worker at the job site shall be certified as a Lead-Related Construction Supervisor. All others shall be certified as Lead-Related Construction Workers, minimally. Guidelines for worker protection and other compliance issues are currently defined per Fed-OSHA (29 CFR 1926.62). All work shall comply with applicable federal, state, and local regulations, laws, and ordinances. Any solid or liquid hazardous wastes generated as a result of lead hazard reduction shall be handled as hazardous waste in accordance with Title 22 CCR Section 66261.

LEAD CLEAN-UP PROCEDURES AND STANDARDS:

1. By July 1, 1996 the Department expects to receive a written **inspection and site assessment** for the subject property. The inspection shall qualify and quantify the nature and extent of existing lead hazards in and on painted or varnished building components throughout the entire interior and exterior of the residential portion of the structure (particularly friction or contact points and locations likely to generate or capture dust as a result of normal operation) and bare soil surrounding the structure. You may be required to inspect neighboring properties suspected of being contaminated as a result of actions occurring at the subject property. You also must provide a site assessment of hazards identified as a result of the inspection. The inspection and site assessment shall conform to procedures taught in State certified courses. The standards by which lead hazards are defined shall be at least as stringent as those included in the attached definitions. The inspection and site assessment shall be done by a person who is certified by the State of California as a Lead-Related Construction Inspector/Assessor.
2. Within 90 days of the completion of the site inspection and assessment, a written **proposed project design** in which lead hazards, identified as a result of the inspection and site assessment, are targeted for reduction. The proposed design shall clearly state the selected method of reduction and specific practices and procedures intended to be used in reducing targeted hazards. The proposed design shall explicitly reveal engineering and administrative controls intended to be used to ensure that nearby properties, unprotected bystanders and *occupants and their possessions* are protected from potential releases (temporary relocation of occupants and their possessions may be needed). **The proposed**

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design shall explicitly list (by drawing and written description) any hazards the violator does not plan to reduce and why.

3. Within 90 days of the completion of the site inspection and assessment, a written **proposed operations and maintenance program** (O&M plan) explaining how hazards *intended to remain* will be controlled to minimize the risk of lead exposure for occupants during the remaining period of tenancy or future tenants. The proposed O&M plan shall require a visual inspection at unit turnover and annually (findings shall be recorded in writing) to ensure that:

- ▶ Coatings and substrates of exposed lead hazards are maintained intact;
- ▶ Interim controls for lead hazards found in soil remain intact;
- ▶ Paint stabilization (enclosure or encapsulation) shall remain intact;
- ▶ Doors and windows are operating correctly;
- ▶ No visible dust at friction and contact points is present.

No certification is required for persons conducting periodic inspections; however, written records shall be retained. The violator/property owner has an obligation to *promptly and safely* remedy any deficiencies detected or those that should have been detected as a result of periodic inspection. The remedy shall reduce the risk of exposure to lead for occupants for the remaining period of tenancy or future tenants.

4. **Review Process**

The County shall have **30 calendar days** to review materials submitted by the owner and *specify* required modifications in writing, if any. All materials submitted by the violator shall contain legible descriptions and illustrations. Should lead hazards that warrant action be omitted from the planned reduction or deficiencies in the inspection, site assessment, project design, or O&M plan be identified, they and any corrective actions required by the County shall be disclosed to the violator in the written itemization. You must comply with County-issued modifications.

You will then have **15 calendar days** to *amend* the originally submitted materials to reflect compliance with all County-

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mandated modifications and return the materials for approval to the County. The property owner, or a designate with the authority to execute contracts on behalf of the violator/property owner, shall sign the proposed design and O&M plan to indicate that: 1) the originally submitted materials have been amended to comply with all County modifications submitted in writing; and (2) the property owner consents to completing the work in accordance with all County mandates and deadlines.

After receiving the *modified and signed* design and O&M plan, County personnel shall have **30 calendar days** to review the materials and make further corrections or approve the project design and O&M plan. Failure to amend proposed materials in accordance with County requirements submitted in writing does not release property owners from an obligation to comply with all modifications submitted by the County in writing. Unjustified delays, resistance to County mandates, and/or noncompliance with County deadlines shall be considered violations and may warrant enforcement actions, citations, or fines.

5. **County Acceptance**

Approval of the materials shall be indicated by the signature of a County designate to the proposed materials. **The County shall accept no responsibility or liability for mandates, recommendations or outcomes of the owner's actions or actions of those he contracts to do the work.** County changes to all documents submitted by the violator, and all original documents bearing signatures shall be retained as County records. Copies shall be provided to you.

6. **Closure**

Once the County has accepted the proposed project design and the operations and maintenance program plans, you will have **60 days** from the date of acceptance to complete the abatement.

You must provide documentation that measurements (physical samples and/or XRF readings) collected from or on surfaces proximal to or affected by the lead hazard reduction are below the applicable standards attached. Samples shall be collected *after the reduction has occurred.* Additionally, you must provide documentation that lead hazards targeted for removal have, in fact, been removed. All post-lead hazard reduction

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sampling strategies shall be approved by the County prior to implementation. Post-lead hazard reduction samples shall be collected no later than 48 hours after work has ceased. The dates and times that lead hazard reduction work is deemed completed and post-lead hazard reduction sampling begins shall be recorded. The County shall not release a property owner from the responsibility to comply without review and approval of the post-lead hazard reduction sampling strategy and submission of results and documentation indicating compliance with attached standards. The property owner shall not lease the subject property legally, until the County has issued a statement confirming compliance with enforcement mandates. Further requirements may be imposed by the County, if conditions change or health hazards posed by lead-containing materials are identified. The party conducting clearance testing and/or inspections shall not have a financial relationship with the contractor who does the lead hazard reduction work. The party who conducts clearance testing and/or inspections shall be qualified (one year of experience in environmental sampling and State certification as a Lead-Related Construction Inspector/Assessor, minimally).

Definitions and Clean-Up Standards for Lead:

Inspection a surface by surface investigation to determine the presence of lead hazards.

Site Assessment an on-site investigation to determine and report the existence, nature, severity, and location of lead hazards including: 1) information gathering regarding the age and history of the housing and occupancy by children under age 6; (2) visual inspection; (3) limited wipe sampling or other environmental sampling techniques; (4) provision of a report explaining the results of the investigation.

Project Design a written description outlining and detailing the actions one intends to take to reduce lead hazards.

Lead hazard reduction actions or measures that reduce or eliminate human exposure to lead hazards including interim controls and permanent abatement.

Lead Hazard any condition that causes exposure to lead from lead-containing dust, soil, or coating agent that is deteriorated or present in accessible surfaces, friction surfaces, or impact

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surfaces that would result in adverse human health effects. The following are County standards:

Paint and varnish is considered to contain excess lead and shall be abated, if analysis results are:

0.5% wgt or greater - Atomic Absorption Spectroscopy (AAS)
1.0 mg/cm² or greater - X-Ray Fluorimetry (XRF)*

* Because the standard approaches the limit of analytical sensitivity (LAS) of current XRF technology, only XRF measurements which are 1.6 mg/cm² or greater are considered lead-positive. Results equal or ranging between 0.4 mg/cm² and 1.6 mg/cm² are considered inconclusive and require confirmatory AAS analysis. Results less than 0.4 mg/cm² are considered lead-negative.

Soil is considered to contain excess lead and require lead hazard reduction, if analysis results are:

500 ppm or greater - Total Threshold Limit Concentration (TTLIC)

If results are 5000 ppm or greater, permanent covering or removal is required.

Dust is considered to contain unacceptable levels of lead and lead hazard reduction is required, if AAS analysis results are equal to or greater than:

100 ug/ft² - floor
200 ug/ft² - baseboard
500 ug/ft² - window sill
500 ug/ft² - chair rail
800 ug/ft² - window well (exterior)

Note: Building components and surfaces for which no standards are provided may be sampled before and after lead hazard reductions. The purpose of such sampling is to show that a surface has been cleaned during the lead hazard reduction. In such cases, sample results obtained prior to lead hazard reductions shall be used as *background* results. Results from interior samples collected in *approximately the same locations after reduction*, shall be less than the comparable *background* result or less than 500 μ g/ft², whichever is less.

Domestic Water Supply shall not contain lead in excess of 15 ppb (AAS analysis).

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mg/cm² = milligrams per square centimeter
wt = by weight
ug/ft² = micrograms per square foot
ppm = parts per million = mg/kg
ppb = parts per billion

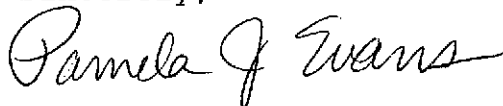
DISCIPLINE:

Property owners are subject to enforcement actions, fines and/or litigation, if it is determined that: 1) misrepresentations about addressing lead hazards have been made; or (2) lead hazards previously identified at the same property are involved in subsequent lead poisoning cases.

WARNING! SINCE THIS PROPERTY IS SUBSTANDARD DUE TO LEAD CONTAMINATION, PURSUANT TO SECTIONS 17274 AND 24436.5 OF THE REVENUE AND TAXATION CODE, ANY TAX DEDUCTION FOR INTEREST, TAXES, DEPRECIATION, OR AMORTIZATION PAID OR INCURRED IN THE TAXABLE YEAR IS ILLEGAL!

By June 1, 1996, please submit a written description of how your contractor/s meets the the above criteria. Also include a brief description of the steps you will take to reduce the lead hazard at the subject property and your proposed timeline. You may contact me at (510)567-6770 with any questions or comments regarding this letter or residential lead contamination there.

Sincerely,



Pamela J. Evans
Senior Hazardous Materials Specialist

c: Jun Makashima, ACDEH
Gordon Coleman, ACDEH
Madhulla Logan, ACDEH
Gil Jensen, Alameda County District Attorney
Ralph Ray, Alameda County Lead Poisoning Prevention Program
Patrick Tang, Oakland City Attorney's Office
Britt Johnson, Oakland Fire Department
Charles Kennedy, Oakland Office of Planning and Building
Chris Wahburon, Sequoia Environmental

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



RAFAT A. SHAHID, DIRECTOR

April 2, 1996

Mr. Francis Collins
6050 Hollis Street
Emeryville, CA - 94608

DEPARTMENT OF ENVIRONMENTAL HEALTH
1131 Harbor Bay Parkway
Alameda, CA 94502-6577
(510) 567-6777

RE: Second Notice of Violation for 4701 San Leandro Street, Oakland, CA - 94601

Dear Mr. Collins:


This is a follow-up to the letter dated January 20, 1994 which was sent to you requesting that you submit additional information to address the potential water quality threat due to methylene chloride (copy of this letter is attached) that was found in the samples collected during the removal of the two concrete vaults. As of this date, no communication has been received from you on this matter. Therefore this letter constitutes a **Second Notice** that you are in violation of specific laws and that the technical report is due. Also, this Department has not received any disposal records for the soils that was excavated during the removal of the underground storage tank and the concrete vaults.

Please submit the following information to this Department withing 30 days from the date of this letter. :

- A workplan to address the methylene chloride contamination found on the referenced property which should at a minimum include 4 soil samples to be collected beneath the 2 concrete vaults. The samples should be analyzed for methylene chloride using the Toxicity Characteristics Leaching Procedure (TCLP) and the regular EPA 8010 analysis.
- All the concerned manifests or disposal receipts that document the disposal of the soil piles which were sampled on October 28, 1993. This sampling event was documented and submitted to this Department in a report dated November 19, 1993. If the soil has not been disposed, then please submit information on the status of the soil that was excavated subsequent to the removal of the underground storage tank and vaults .

This a formal request for technical documents pursuant to Section 13267 (b) of the water code. The workplan has to be approved by this Department before initiating any field work. If you have any questions, you can reach me at (510) 567-6764.

Sincerely,


Madhulla Logan,
Hazardous Material Specialist

RADIOACTIVE MATERIAL LICENSE

Pursuant to the California Code of Regulations, Division 1, Title 17, Chapter 5, Subchapter 4, Group 2, Licensing of Radioactive Material, and in reliance on statements and representations heretofore made by the licensee, a license is hereby issued authorizing the licensee to receive, use, possess, transfer, or dispose of radioactive material listed below, and to use such radioactive material for the purpose(s) and at the place(s) designated below. This license is subject to all applicable rules, regulations, and orders of the Department of Health Services now or hereafter in effect and to any standard or specific condition specified in this license.

1. Licensee	Environmental Lead Detection	3. License No.	6065-90	Amendment No:	3
2. Address	330 Townsend Street, Suite 216 San Francisco, CA 94107	4. Expiration date	June 23, 2001		(5)
Attention:	James Ratti, President Radiation Safety Officer	5. Inspection agency	Radiologic Health Branch Berkeley		

License Number 6065-90 is hereby amended as follows:

6. Nuclide	7. Form	8. Possession Limit
A. Cobalt 57	A. Sealed sources (IPL Model CU5C0057)	A. 2 sources not to exceed 15 millicuries each.

9. Authorized Use

- A. To be used as components of RMD Model LPA-1 X-Ray Fluorescence devices for measurement of lead content of painted surfaces and other materials.

LICENSE CONDITIONS

- 10. Radioactive materials may be used at temporary job sites of the licensee in areas not under exclusive federal jurisdiction throughout the State of California. Radioactive materials may be permanently stored only at:
 - (a) 330 Townsend Street, Suite 216, San Francisco, CA
- 11. This license is subject to an annual fee for sources of radioactive material authorized to be possessed at any one time as specified in Item 8 of this license. The annual fee for this license is required by and computed in accordance with Sections 30230-30232 of the California Radiation Control Regulations and is also subject to an annual cost-of-living adjustment pursuant to Section 113 of the California Health and Safety Code.
- 12. Radioactive material shall be used by the following individuals:
 - (a) James Ratti
 - (b) Maurice R. Brody
 - (c) Julio Pineda, Jr.
 - (d) Conrad D. Florez
 - (e) Mark A. Davis

RADIOACTIVE MATERIAL LICENSE

License Number: 6065-90

Supplementary Sheet

Amendment Number: 3

13. Except as specifically provided otherwise by this license, the licensee shall possess and use radioactive material described in Items 6, 7, 8 and 9 of this license in accordance with statements, representations, and procedures contained in the documents listed below. The Department's regulations shall govern unless the statements, representations, and procedures in the licensee's application and correspondence are more restrictive than the regulations.
 - (a) The application with attachments dated June 22, 1994, signed by Sol Levine.
 - (b) The letter with attachments dated July 14, 1995, signed by James Ratti, regarding a change of storage address.
14.
 - (a) The Radiation Safety Officer in this program shall be James Ratti.
 - (b) The Alternate Radiation Safety Officer in this program shall be Maurice Brody.
15. Sealed sources possessed under this license shall be tested for leakage and/or contamination as required by Section 30275 (c) of the California Radiation Control Regulations.
16. The following individuals are authorized to collect wipe test samples of sealed sources possessed under this license using leak test kits acceptable to the California Department of Health Services:
 - (a) the Radiation Safety Officer
 - (b) qualified individuals designated in writing by the Radiation Safety Officer
17. Quantitative analytical assays for the purpose of tests for leakage and/or contamination of sealed sources shall be performed only by persons specifically authorized to perform that service.
18. Records of leak test results shall be kept in units of microcuries and maintained for inspection. Records may be disposed of following Department inspection. Any leak test revealing the presence of 0.005 microcuries or more of removable radioactive material shall be reported to the Department of Health Services, Radiologic Health Branch, 601 N. 7th Street P.O. Box 942732, Sacramento, CA 94234-7320, within five days of the test. This report shall include a description of the defective source or device, the results of the test, and the corrective action taken.
19. At any time the licensee is engaged in making measurements by authority of this license at either a permanent or a temporary job site, the licensee shall have a current copy of each of the following documents available for inspection at the job site:
 - (a) A statement authorizing each qualified individual to use radioactive material (See Condition 12).
 - (b) This License.
 - (c) The manufacturer's instruction manual with appropriate emergency procedures.

For the State Department of Health Services

te August 21, 1995

By: _____

James Ratti

Radiologic Health Branch
P.O. Box 942732, Sacramento, CA 94234-7320

DEPARTMENT OF HEALTH SERVICES

2151 BERKELEY WAY
BERKELEY, CA 94704-1011

(510) 450-2453

February 16, 1995

Mr. James J. Ratti
603 Anacapa Lane
Foster City, California 94404

Dear Mr. Ratti:

Congratulations! You have met the California Department of Health Services requirements to be Interim Certified as a Lead-Related Construction Inspector/Assessor.

You will receive a photo identification card from the Department of Health Services at a later date. Until then, this letter serves as your proof of Interim Certification by the Department.

Your Interim Certification expires on 02/16/96. Your interim certificate number is I316. To renew your Interim Certification, you must apply for renewal to the Department by 10/19/95.

Thank you for your cooperation.

Sincerely,

Kim Cox, M.P.H., Acting Chief
Lead Accreditation and
Certification Unit,
Childhood Lead Poisoning
Prevention Branch

State of California
Department of Health Services
Lead-Related Construction Interim Certificate

James J. Ratti

Inspector/Assessor
1316 (Exp. 02/15/97)



Certificate of Achievement

This is to certify that

Jim Ratti
of **Environmental Lead Detection**

on the Twenty-Fifth day of July 1994 successfully completed the factory training for
RMD's LPA-1 Lead Paint Inspection System

including, but not limited to, the topics of Radiation Safety
and the Proper Use of the Instrument.


Jacob Paster, Vice-President of RMD
44 Hunt St., Watertown, Massachusetts

