

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



RO# 2637

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 through out 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.

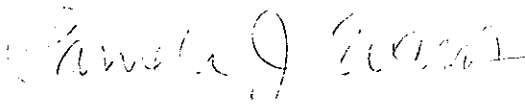
- 1) Ensure that workers are fully trained in work practices that limit their own exposure to lead and that prevent contamination to the surrounding areas.
- 2) Post warning signs on the outside of the building being worked on and on other buildings and public access areas within 20 feet of the building.

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
Madhulla Logan, 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

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



RO# 2637

April 30, 1997

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

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

**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

c: 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

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



RO# 2637

February 25, 1997

Francis Collins
6050 Hollis St.
Emeryville CA 94608

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

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

Dear Mr. Collins:

The review of the additions to the December, 1996 Workplan for Lead-Based Paint and Soil Abatement, including risk assessment information, has been completed. The Workplan, with addenda, is acceptable to this Office. Your contractors should begin implementing the Workplan as soon as possible.

Ralph Ray of the Alameda County Lead Poisoning Prevention Program will contact Debra Baker to arrange an inspection of a few of the units in the near future. The purpose of this visit is to verify site conditions as described in the Workplan. I will notify you and your contractors of any required changes to the Workplan that may result from Mr. Ray's inspection.

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
Jim Ratti, Environmental Lead Detection

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



Be.

RO# 2637

STIP 4769

December 31, 1996

Francis Collins
6050 Hollis St.
Emeryville CA 94608

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

**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

Francis Collins Property
(Dutch Boy Studios)
4701 San Leandro St. Oakland
December 31, 1996
Page 1 of 3

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 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.

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



RO# 2637

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**

Francis Collins
4701 San Leandro St.
May 15, 1996
Page 3 of 7

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-

Francis Collins
4701 San Leandro St.
May 15, 1996
Page 4 of 7

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

Francis Collins
4701 San Leandro St.
May 15, 1996
Page 5 of 7

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

Francis Collins
4701 San Leandro St.
May 15, 1996
Page 6 of 7

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 (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 µg/ft², whichever is less.

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

Francis Collins
4701 San Leandro St.
May 15, 1996
Page 7 of 7

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

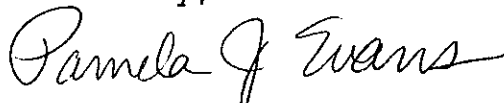
DISCIPLINE:

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 Wahburzoh, Sequoia Environmental

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



RO# 2637

RAFAT A. SHAHID, DIRECTOR

May 1, 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: Lead Contamination of Residential Units at
4701 San Leandro St., Oakland 94601**

Dear Mr. Collins:

I am writing as a follow-up to the multi-agency meeting held April 16, 1996. At the meeting, we discussed the requirement that you investigate and remediate the lead hazard which exists for residential tenants at 4701 San Leandro St. It has been established that lead at the subject property exceeds safe residential levels. The California Code of Civil Procedure Section 731, the Health and Safety Code Section 17980, and the Penal Code Section 373a require that a lead nuisance be abated.

As we discussed at the April 16 meeting, the Department of Environmental Health will oversee the lead investigation and remediation. We require a deposit to cover the costs of case management. (Alameda County Ordinances 3-140.3 and 3-140.4(z)). Please submit a check, payable to Alameda County Environmental Protection, for \$3,000.00.

I will provide you with specific information regarding investigation and remediation standards in the near future. While you may seek information from other agencies, all communications and directives which will meet the requirements set forth in our meeting must come through this office. You may contact me at (510)567-6770 with any questions.

Sincerely,

Pamela J. Evans
Senior Hazardous Materials Specialist

c: Jun Makishima, ACDEH
Ariu Levi, 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