

**LIMITED LEAD-CONTAINING PAINT
SURVEY REPORT**

**Renovate 3A for Gastroenterology and Pulmonary
Project 573-15-102
Malcom Randall VA Medical Center
Gainesville, FL**

GLE Project No.: 16950-00371

Prepared for:

**Mr. Randy Hensley, P.E.
AKEA, Inc.
3603 NW 98th Street
Suite B
Gainesville, Florida 32606**

March 2016

Prepared by:



8659 Baypine Road, Suite 306, Jacksonville, FL 32256
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GLE

ARCHITECTS | ENGINEERS | ENVIRONMENTALS CONSULTANTS

March 31, 2016

Mr. Randy Hensley, P.E.
AKEA, Inc.
3603 NW 98th Street, Suite B
Gainesville, Florida 32606

**RE: Limited Lead-Containing Paint Survey Report
Renovate 3A for Gastroenterology and Pulmonary
Project 573-15-102
Malcom Randall VA Medical Center
Gainesville, FL**

GLE Project No.: 16950-00371

Dear Mr. Hensley:

GLE Associates, Inc. (GLE) performed a limited survey to identify lead-containing paint on March 14, 15, and 16, 2016, at the Malcom Randall VA Medical Center, located in Gainesville, Florida. The survey was performed by Mr. Michael D. Harrell and Mr. Matthew Miller with GLE. This report outlines the sampling and testing procedures, and presents the results along with our conclusions and recommendations.

GLE appreciates the opportunity to work with you on this project. Should you have questions regarding any of the information contained in this report, please do not hesitate to contact our office.

Sincerely,
GLE Associates, Inc.


Michael D. Harrell
Environmental Scientist



Robert B. Greene, PE, PG, CIH, LEED AP
President

MDH/RBG/lr

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GLE Associates, Inc.

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1.0 EXECUTIVE SUMMARY

1.1 INTRODUCTION

On March 14, 15, and 16, 2016, a limited lead-containing paint survey was conducted at the Malcom Randall VA Medical Center, located at 1601 SW Archer Road, in Gainesville, FL. The scope of the survey was limited to the 3A Gastroenterology and Pulmonary areas of the facility, as shown in the client provided drawings. Access to plenum spaces in corridors and patient rooms was limited at the time of the survey. The survey was performed by Mr. Michael D. Harrell and Mr. Matthew Miller with GLE.

1.2 FACILITY DESCRIPTION

A summary of the facility investigated is outlined in the table below.

Facility Type:	Hospital
Construction Date:	1967
Number of Floors:	1 in scope
Structural	
Foundation:	Concrete Slab
Wall Support:	Concrete Block
Exterior Finish:	Paint, Brick
Roof Support:	Not in Scope
Roof System Type:	Not in Scope
Mechanical/Plumbing	
HVAC Type:	Cooling Tower/Chiller
Duct Type:	Metal, Flex
Pipe Insulation:	Fiberglass
Interior	
Wall Substrate:	Drywall and Joint Compound, Plaster
Wall Finishes:	Paint, Cove Base, Wallpaper
Floor Substrate:	Concrete
Floor Finishes:	Vinyl Floor Tile, Ceramic Tile, Carpet
Ceiling System:	Drywall and Joint Compound, Suspended Ceiling System
Ceiling Finishes:	Paint, Suspended Ceiling Tiles

2.0 RESULTS

2.1 LEAD SURVEY PROCEDURES

It is GLE's understanding that the survey was conducted to provide information needed to comply with 29 CFR Part 1926 "Lead Exposure in Construction; Interim Final Rule" for future demolition and/or renovation activities. The Scope of the "Lead Exposure in Construction; Interim Final Rule" "...applies to all occupational exposure to lead in all construction work in which lead, in any amount, is present in an occupationally related context." Due to the lack of a firm correlation between lead levels in paint and airborne lead levels during construction activities, OSHA has developed task-related triggers that require the implementation of the provisions required in 29 CFR Part 1926. Demolition and/or renovation activities involve tasks covered under this standard.

The limited survey was performed by observing and testing accessible painted component surfaces of the building. The sampling protocol used in this lead paint survey is a modified version of the survey methodology established by HUD. The protocol was modified to conform to the specific parameters of this project.

After the overall visual survey was completed, an inventory of painted surfaces was developed. The surveyor then subdivided the areas into homogeneous areas of apparent similar paint history.

Sampling of the paint surfaces was performed by collecting representative paint chips. All samples were submitted to EMSL Analytical, Inc., an accredited laboratory recognized under EPA's National Lead Laboratory Accreditation Program (NLLAP), located in Kernersville, North Carolina. These samples were analyzed by EPA Method SW 846 3050B/7000B and the results are reported in percentage of lead by weight of the paint sample (% Wt).

2.2 IDENTIFIED SUSPECT LEAD-CONTAINING PAINT

A total of seven (7) samples of suspect lead-containing paint were collected from the facility during the survey. The results of the laboratory analyses are included in **Appendix A**.

A summary of the paint chip sample analytical results is outlined in the following table:

**TABLE 2.2-1: SUMMARY OF ANALYTICAL RESULTS
 RENOVATE 3A FOR GASTROENTEROLOGY AND PULMONARY
 MALCOM RANDALL VA MEDICAL CENTER – GAINESVILLE, FLORIDA**

SAMPLE #	BUILDING	INTERIOR OR EXTERIOR	LOCATION	COMPONENT	COLOR	LEAD CONCENTRATION (% BY WEIGHT)
L-01	Building 1	Interior	Throughout Scope	Plaster Walls	White	< 0.010
L-02	Building 1	Interior	Bathroom Ceilings	Drywall Ceilings	White	0.070
L-03	Building 1	Interior	Rooms	Metal Door Frames	Blue	0.083
L-04	Building 1	Interior	Corridors	Metal Door Frames	Cream	< 0.010
L-05	Building 1	Interior	Throughout Scope	Wood Doors	Cream	< 0.010
L-06	Building 1	Interior	Corridors	Plaster Walls	Orange	< 0.010
L-01	Building 1	Interior	Corridors	Plaster Walls	Cream	< 0.010

¹ **BOLD** result indicates lead-containing paint.

² The requirements of the OSHA Lead in Construction Standard 29CFR 1926.62 are invoked if any amount of lead is present in the sample; there is no minimum concentration.

3.0 CONCLUSIONS AND RECOMMENDATIONS

Analytical results indicate that two (2) of the seven (7) painted surfaces tested contain concentrations (% by weight) of lead within the paint greater than the laboratory's detection limits.

Under the present OSHA lead construction standard, **all identified lead-containing paint affected by construction activities falls under the requirements of 29 CFR 1926.** There are no current government guidelines defining a lead paint concentration that creates a hazardous atmosphere when disturbed. Based on current OSHA guidelines, for those employees who will be disturbing lead-containing paint, their employer must make an initial determination by monitoring employee exposure if any employee is exposed to lead at or above 30 ug/m^3 (8-hour TWA).

The employer must implement OSHA prescribed protective measures until they can demonstrate that the employee exposure is not in excess of the action level. For any planned demolition or renovation, where abrasive blasting, welding, cutting and/or torch burning are planned for any facility which contain lead-based paint, GLE recommends the removal of lead paint by a properly trained lead removal contractor where these activities are planned.

For all identified lead painted materials where manual demolition (e.g. drywall) manual scraping, manual sanding and heat gun applications are planned: provide workers with interim protection as outline in the OSHA Lead Construction Standard until the employee exposure monitoring indicate that that all tasks being performed are not exposing employees above the Permissible Exposure Limit (PEL).

The interim employee protection measures include but are not limited to the following: appropriate respiratory protection; appropriate personal protective clothing and equipment; change areas; hand washing facilities; biological monitoring; and training.

All waste generated during the lead paint removal and during subsequent manual demolition or renovation activities should be characterized by Toxicity Characteristic Leaching Procedure testing for lead for waste disposal purposes.

Additionally, the EPA Renovation, Repair, and Painting Rule requires that firms performing renovation, repair, and painting projects that disturb lead-based paint in pre-1978 homes, child care facilities and schools be certified by EPA and that they use certified renovators who are trained by EPA-approved training providers to follow lead-safe work practices.

4.0 LIMITATIONS AND CONDITIONS

Due to the inaccessibility of some building elements, it is conceivable that all potential lead-containing paint within the extents of this survey may not have been located and identified. We do warrant, however, that the investigations and methodology reflect our best efforts based upon the prevailing standard of care in the environmental industry.

APPENDIX A
Analytical Results and Chain of Custody

**EMSL Analytical, Inc.**

706 Gralin Street, Kernersville, NC 27284

Phone/Fax: (336) 992-1025 / (336) 992-4175

<http://www.EMSL.com>greensborolab@emsl.com

EMSL Order: 021601878

CustomerID: GLEA51B

CustomerPO:

ProjectID:

Attn: **Paul Zak**
GLE Associates
2228 N.W. 40th Terrace
Suite C
Gainesville, FL 32605

Phone: (352) 335-6648
 Fax:
 Received: 03/17/16 10:00 AM
 Collected:

Project: 16950-00371 3A GI and Pulmonary

Test Report: Lead in Paint Chips by Flame AAS (SW 846 3050B/7000B)*

<i>Client Sample Description</i>	<i>Lab ID</i>	<i>Collected</i>	<i>Analyzed</i>	<i>Lead Concentration</i>
L-01	021601878-0001	3/18/2016		<0.010 % wt
L-02	021601878-0002	3/18/2016		0.070 % wt
L-03	021601878-0003	3/18/2016		0.083 % wt
L-04	021601878-0004	3/18/2016		<0.010 % wt
L-05	021601878-0005	3/18/2016		<0.010 % wt
L-06	021601878-0006	3/18/2016		<0.010 % wt
L-07	021601878-0007	3/18/2016		<0.010 % wt

James Cole

James Cole, Laboratory Manager
 or other approved signatory

*Analysis following Lead in Paint by EMSL SOP/Determination of Environmental Lead by FLAA. Reporting limit is 0.010 % wt based on the minimum sample weight per our SOP. Unless noted, results in this report are not blank corrected. This report relates only to the samples reported above and may not be reproduced, except in full, without written approval by EMSL. EMSL bears no responsibility for sample collection activities. Samples received in good condition unless otherwise noted. "<" (less than) result signifies that the analyte was not detected at or above the reporting limit. Measurement of uncertainty is available upon request. The QC data associated with the sample results included in this report meet the recovery and precision requirements unless specifically indicated otherwise. Samples analyzed by EMSL Analytical, Inc. Kernersville, NC EMSL Lab ID 102564 is accredited by the AIHA Laboratory Accreditation Program (AIHA-LAP), LLC in the Environmental Lead accreditation program for Lead in Paint Chips.

Initial report from 03/21/2016 08:34:45

EMSL Analytical, Inc.
706 Grain Street



EMSL ANALYTICAL, INC.
LABORATORY PRODUCTS TRAINING

Lead (Pb) Chain of Custody
EMSL Order ID (Lab Use Only).

1878

Kernersville, NC 27284
PHONE: (336) 992-1025
FAX: (336) 992-4175

Company : GLE Associates		EMSL-Bill to: <input checked="" type="checkbox"/> Different <input type="checkbox"/> Same <small>If Bill to is Different note instructions in Comments**</small>		
Street: 2228 NW 40th Ter Suite C		<i>Third Party Billing requires written authorization from third party</i>		
City: Gainesville	State/Province: FL	Zip/Postal Code: 32605	Country: United States	
Report To (Name): Paul Zak		Telephone #: 352-335-6648		
Email Address: pzak@gleassociates.com		Fax #:	Purchase Order:	
Project Name/Number: 16950-00371 3A GI and Pulmonary		Please Provide Results: <input type="checkbox"/> FAX <input checked="" type="checkbox"/> E-mail <input type="checkbox"/> Mail		
U.S. State Samples Taken: FL		CT Samples: <input type="checkbox"/> Commercial/Taxable <input type="checkbox"/> Residential/Tax Exempt		
Turnaround Time (TAT) Options* - Please Check				
<input type="checkbox"/> 3 Hour <input type="checkbox"/> 6 Hour <input type="checkbox"/> 24 Hour <input type="checkbox"/> 48 Hour <input checked="" type="checkbox"/> 72 Hour <input type="checkbox"/> 96 Hour <input type="checkbox"/> 1 Week <input type="checkbox"/> 2 Week				
<small>*Analysis completed in accordance with EMSL's Terms and Conditions located in the Price Guide</small>				
Matrix	Method	Instrument	Reporting Limit	Check
Chips <input checked="" type="checkbox"/> % by wt. <input type="checkbox"/> mg/cm ² <input type="checkbox"/> ppm	SW846-7000B	Flame Atomic Absorption	0.01%	<input checked="" type="checkbox"/>
Air	NIOSH 7082	Flame Atomic Absorption	4 µg/filter	<input type="checkbox"/>
	NIOSH 7105	Graphite Furnace AA	0.03 µg/filter	<input type="checkbox"/>
	NIOSH 7300 modified	ICP-AES/ICP-MS	0.5 µg/filter	<input type="checkbox"/>
Wipe* <input type="checkbox"/> ASTM <input type="checkbox"/> non ASTM *if no box is checked, non-ASTM Wipe is assumed	SW846-7000B	Flame Atomic Absorption	10 µg/wipe	<input type="checkbox"/>
	SW846-6010B or C	ICP-AES	1.0 µg/wipe	<input type="checkbox"/>
	SW846-7000B/7010	Graphite Furnace AA	0.075 µg/wipe	<input type="checkbox"/>
TCLP	SW846-1311/7000B/SM 3111B	Flame Atomic Absorption	0.4 mg/L (ppm)	<input type="checkbox"/>
	SW846-1131/SW846-6010B or C	ICP-AES	0.1 mg/L (ppm)	<input type="checkbox"/>
Soil	SW846-7000B	Flame Atomic Absorption	40 mg/kg (ppm)	<input type="checkbox"/>
	SW846-7010	Graphite Furnace AA	0.3 mg/kg (ppm)	<input type="checkbox"/>
	SW846-6010B or C	ICP-AES	2 mg/kg (ppm)	<input type="checkbox"/>
Wastewater Unpreserved <input type="checkbox"/> Preserved with HNO ₃ pH < 2 <input type="checkbox"/>	SM3111B/SW846-7000B	Flame Atomic Absorption	0.4 mg/L (ppm)	<input type="checkbox"/>
	EPA 200.9	Graphite Furnace AA	0.003 mg/L (ppm)	<input type="checkbox"/>
	EPA 200.7	ICP-AES	0.020 mg/L (ppm)	<input type="checkbox"/>
Drinking Water Unpreserved <input type="checkbox"/> Preserved with HNO ₃ pH < 2 <input type="checkbox"/>	EPA 200.9	Graphite Furnace AA	0.003 mg/L (ppm)	<input type="checkbox"/>
	EPA 200.8	ICP-MS	0.001 mg/L (ppm)	<input type="checkbox"/>
TSP/SPM Filter	40 CFR Part 50	ICP-AES	12 µg/filter	<input type="checkbox"/>
	40 CFR Part 50	Graphite Furnace AA	3.6 µg/filter	<input type="checkbox"/>
Other:				<input type="checkbox"/>
Name of Sampler: Michael D. Harrell		Signature of Sampler: <i>Michael D. Harrell</i>		
Sample #	Location	Volume/Area	Date/Time Sampled	
L-01	White Plaster		03/15/16	
L-02	White Drywall		03/15/16	
L-03	Blue Metal		03/15/16	
L-04	Cream Metal		03/15/16	
L-05	Cream Wood		03/15/16	
Client Sample #'s: L-01, L-02, L-03, L-04, L-05		Total # of Samples: 7		
Relinquished (Client): <i>Michael D. Harrell</i>	Date: 3/16/16	Time: 1700		
Received (Lab): <i>JH</i>	Date: 3-17-16	Time: 10 AM		
Comments: Bill To: GLE Associates, 4300 West Cypress Street, Suite 400, Tampa, FL, 33607, United States Attention: Deondrea Jones Phone: 888-453-4531 Email: djones@gleassociates.com Purchase Order: FX 8085 0885 8954				

APPENDIX B
Personnel and Laboratory Qualifications

United States Environmental Protection Agency

This is to certify that

GLE Associates, Inc.

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

In the Jurisdiction of:

Florida

This certification is valid from the date of issuance and expires

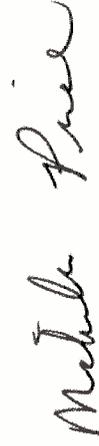
March 03, 2018

FL-2060-5

Certification #

January 15, 2015

Issued On



Michelle Price, Chief

Lead, Heavy Metals, and Inorganics Branch



United States Environmental Protection Agency

This is to certify that

Michael D. Harrell

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

Risk Assessor

In the Jurisdiction of:

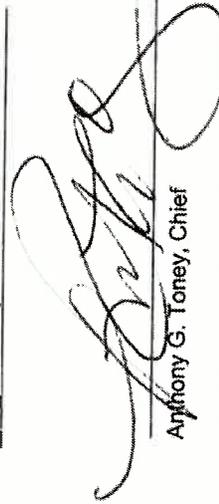
Florida

This certification is valid from the date of issuance and expires August 28, 2016

FL-R-15640-3

Certification # JUL 25 2013

Issued On


Anthony G. Toney, Chief
Pesticides and Toxic Substances Branch



Environmental Training Fund

40619-438CERT/PBIRE

900 N.W. 5TH Avenue, Fort Lauderdale, Florida 33311

(954) 524-7208

Processed By:



X X X - X X - 6 2 3 6

435 SE 8 St, Gainesville, FL 32601

To Authenticate Certificate
www.seagulltraining.com
1-800-966-9933

This is to Certify that

Michael D. Harrell

has successfully completed an English

Lead 8 Hr. Building Inspector Refresher

18-Mar-15 TO 18-Mar-15

Initial courses include an extensive hands-on component.

Training includes: Arsenic, Barium, Cadmium, Chromium, Lead, Selenium, Silver & Mercury

Trainer(s): Alberto A. Ania

Training Address: 2233 Park Avenue Suite 202, Orange Park, FL., 32073

Passed the hands-on assessment & completed the course exam on: 18-Mar-15

This Certificate Expires:

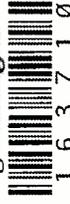
OSHA DATE: 17-Mar-16

SUNSET DATE: 17-Mar-18



0 3 / 1 7 / 1 8

James F. Stump, Training Manager



Certificate Number: 1 6 3 7 1 0

Course Number: JE1512

USEPA's actual expiration date will appear on individual's license. See individual state rules for state expiration date.

UNDER ONE OR MORE FEDERAL PENALTIES OF 50 USC 3161 OR 3162 OR
SUBSECTION (b) OF SECTION 1001 OF TITLE 18, U.S.C. 1001 AND
REPEALING THE PROVISIONS OF THE FEDERAL PENALTIES OF 50 USC
3161 OR 3162 OR THE PROVISIONS OF TITLE 18, U.S.C. 1001
FOR VIOLATIONS OF THE PROVISIONS OF 50 USC 3161 OR 3162 OR
TITLE 18, U.S.C. 1001.



AIHA Laboratory Accreditation Programs, LLC

acknowledges that

EMSL Analytical, Inc.

706 Gralin Street, Kenersville, NC 27284

Laboratory ID: 102564

along with all premises from which key activities are performed, as listed above, has fulfilled the requirements of the AIHA Laboratory Accreditation Programs (AIHA-LAP), LLC accreditation to the ISO/IEC 17025:2005 international standard, *General Requirements for the Competence of Testing and Calibration Laboratories* in the following:

LABORATORY ACCREDITATION PROGRAMS

- INDUSTRIAL HYGIENE
 - ENVIRONMENTAL LEAD
 - ENVIRONMENTAL MICROBIOLOGY
 - FOOD
 - UNIQUE SCOPES
- Accreditation Expires: _____
 - Accreditation Expires: 09/01/2016
 - Accreditation Expires: _____
 - Accreditation Expires: _____
 - Accreditation Expires: _____

Specific Field(s) of Testing (FoT)/Method(s) within each Accreditation Program for which the above named laboratory maintains accreditation is outlined on the attached **Scope of Accreditation**. Continued accreditation is contingent upon successful on-going compliance with ISO/IEC 17025:2005 and AIHA-LAP, LLC requirements. This certificate is not valid without the attached **Scope of Accreditation**. Please review the AIHA-LAP, LLC website (www.aihaaccreditedlabs.org) for the most current Scope.

Gerald R. Schultz

Gerald Schultz, CIH
Chairperson, Analytical Accreditation Board

Revision 14: 03/26/2014

Cheryl O. Morton

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

Date Issued: 10/31/2014