

**Date:** January 9, 2017

**From:** Chief, Occupational Safety & Health (130)

**Subj:** Reconnaissance Lead Paint Inspection of Cooling Tower Bldg. 40 Chiller Plant

**To:** Engineering

1. The purpose of this memorandum is to summarize the results from Occupational Safety and Health (OSH) Reconnaissance Lead Paint Inspection of Cooling Tower Bldg. 40 Chiller Plant at the Greater Los Angeles (GLA) Veteran's Administration Sepulveda Campus.
2. Industrial Hygiene conducted the testing on January 4, 2017 collecting lead paint chip samples in accordance with EPA guidelines for lead inspection. The action level as defined in HUD regulation 24 CFR 965.706@ (53FR 20803, June 6, 1988), is a lead concentration at or above 1.0mg/cm<sup>2</sup>. Below is the lead inspection and sampling results performed by Occupational Safety and Health.

01-04-2017: North and South Cooling Towers were inspected for lead based paint. Paint-chip samples should contain all layers of paint (not just peeled layers) and must always include the bottom layer. If results will be reported in mg/cm<sup>2</sup>, including a small amount of substrate with the sample will not significantly bias results. Substrate material should not, however, be included in samples reported in weight percent. Paint from 4 square inches (25 square centimeters) should provide a sufficient quantity for laboratory analysis. Collected paint chip samples will be analyzed by AmeriSci Los Angeles, a laboratory recognized under the EPA's National Lead Laboratory Accreditation Program (NLLAP). Based on the assessment and testing, we conclude the following:

- The North and South Cooling Towers observed during the site inspection show deterioration and damages.
  - Based on the Laboratory analysis, lead base paint above the regulatory action level was detected on the exterior surface of the North and South Cooling Tower Green Horizontal areas.
3. Based on the Laboratory analysis by American Scientific, using the EPA Method 3050B/7000B, we recommend the abatement of lead paint using certified and protected lead workers at the site.

4. Industrial Hygiene conducted the lead inspection in accessible areas of the site. Other conditions may exist in inaccessible areas. The conclusions and recommendations describe only the conditions present at the time of our survey, in areas that were observed. This survey was performed in general accordance with the standards of care and diligence normally practiced by recognized consulting firms in performing services of a similar nature.
5. Please contact Dale William for questions concerning this survey.

A handwritten signature in black ink that reads "Ben K Spivey". The signature is written in a cursive style with a large, looped "y" at the end.

Ben K. Spivey, M.S.  
Chief, Occupational Safety and Health