



October 7, 2016

Levin-Porter Associates, Inc.
3011 Newmark Drive
Miamisburg, Ohio 45342

Attn: Mr. Ward Scantlin, AIA
Project Architect
T: 937.224.1931
E: wscantlin@levin-porter.com

Re: Limited Testing of Paint for Lead Content
Project: Replace Operating Room Chillers
VA Project No. 539-18-203
Cincinnati VA Medical Center
3200 Vine Street
Cincinnati, Hamilton County, Ohio
Terracon Project No. N1167069

Dear Mr. Scantlin:

The purpose of this letter report is to present the results of limited testing of paints for lead-content which was performed on August 12, 2016 in support of the above-referenced renovation project at the Cincinnati VA Medical Center (CVAMC). The limited testing was conducted in general accordance with our proposal number PN1167069, dated February 8, 2016. We understand that this limited testing was requested due to the potential disturbance of painted surfaces during the renovation project.

Our scope of service was limited to the collection of random "grab" bulk paint chip/scraping samples from various locations which may be included in the project. The purpose of the limited sampling was meant to provide the client with a general screening as to the presence and likelihood of lead-containing paint (LCP) which may be encountered during the project. The random sampling methodology was not meant to be a complete surface-by-surface investigation for all painted surfaces which may be disturbed as a result of the project, and was not meant for compliance with Ohio Department of Health (ODH) regulation 3701-32, U.S. Department of Housing and Urban Development (HUD) Guidelines for the Evaluation and Control of Lead-Based Paint Hazards in Housing, or federal EPA Renovation, Repair, and Painting Rule (RRP). The aforementioned state and federal regulations and guidelines are currently applicable only to residential housing built prior to 1978 and to child-occupied facilities where the same child visits the facility for at least two different days in a week for at least three hours per day (combined weekly visits must be at least six hours and combined annual visits must be at least 60 hours).

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Environmental



Facilities



Geotechnical



Materials

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The limited LCP testing was conducted on August 12, 2016 by Terracon representatives, Mr. Michael A. Sulken and Mr. Tyler J. Stenten. A total of 8 paint sample chip/scrapings were collected using clean straight-edge razors from various random painted components at various random project locations. Each sample was placed in a new 3"x5" clear 6-mil polyethylene sample baggie and labeled with a unique sample number and logged on a laboratory chain of custody form. The collected samples were delivered to International Asbestos Testing Laboratories (IATL) located in Mt. Laurel, New Jersey. IATL is accredited by the American Industrial Hygiene Association (AIHA-LAP, LLC) Environmental Lead AIHA Proficiency Analytical Testing Programs (ELPAT) (#100188) and by ODH as a state accredited environmental lead analytical laboratory. The submitted samples were analyzed in accordance with the following method: ASTM D3335-08 Atomic Absorption.

Limited Testing for LCP - Results

The results pertaining to the paint samples collected and analyzed for this project are summarized in the table located in Attachment A. The analytical result for each collected sample is reported as a concentration of lead in parts per million (ppm). The analytical report and sample chain of custody are included in Attachment B.

Out of the eight (8) random grab samples collected and analyzed, the laboratory indicated the presence of lead above the detection limit in five (5) of the eight (8) samples (see Attachment A). Given that this sampling event was limited, in addition to those painted components analytically-confirmed to contain lead, all untested paints should be considered to also contain lead.

For purposes of federal Occupational Safety and Health Administration (OSHA) compliance with LCP, it is important to note that OSHA does not reference a specific concentration of lead in a surface coating for applicability of 29 CFR 1926.62 (Lead in Construction); rather, any concentration of lead found in a paint or varnish coating (above the analytical detection limit) would be applicable under 29 CFR 1926.62. In reference to the OSHA regulation, paints (and varnishes) containing any concentration of lead when disturbed represent a potential for personal airborne exposure which could exceed a permissible exposure limit (PEL). Contractors who may bid or perform future renovation work must be made aware of known and/or assumed LCP. Contractors must follow all applicable federal and state regulations for the disturbance of LCP which may be enforced at the time of renovation. If more strict regulations are not enforced at the time of renovation, such as implementation of the federal EPA RRP rule on public and commercial buildings, the owner may however consider adopting such rules for application to the renovation which would be protective of the owner, contractors, employees, and future occupants.

Regarding LCP wastes which may be generated, the Ohio EPA considers debris generated during the construction, renovation or demolition of a commercial building that is destined for disposal as wastes which must be evaluated for hazardous constituents. This evaluation is the generator's

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responsibility and can include any knowledge of the materials used to construct the building and analyses of representative samples of the waste by the toxic characteristic leaching procedure (TCLP) method. If debris is some form of metal, such as steel structural components, lead pipes, or electrical components, they may be recycled as scrap metal without regulation under current Ohio EPA hazardous waste rules, even if coated with “lead-based paint”.

The limited paint testing was conducted in a manner consistent with the level of care and skill ordinarily exercised by members of the profession currently practicing under similar conditions in the same locale. The results, findings, conclusions, and recommendations expressed in this letter report are based on conditions observed during the limited sampling event. This letter report has been prepared on behalf of and exclusively for use and reliance by Levin-Porter Associates. This letter report is not a bidding document. Contractors or consultants reviewing this limited sampling report must draw their own conclusions regarding whether further investigation or remediation is deemed necessary. Terracon does not warrant the work of regulatory agencies, laboratories, or other third parties supplying information, which may have been used in the preparation of this report. No warranty, express or implied, is made.

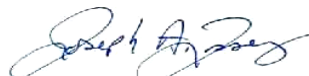
Terracon appreciates the opportunity to provide this service Heapy Engineering. If we can provide any additional environmental, occupational health, or safety-related services, please call us at (513) 321-5816.

Sincerely,

Terracon Consultants, Inc.



Tyler J. Stenten
Environmental Technician



Joseph A. Tussey, CHMM
Group Manager

Attachments: A – Sample Summary and Results
B – Laboratory Analytical Report and Sample Chain of Custody

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Attachment A
Paint Sample Summary and Results

Sample Summary Table

Terracon Sample #	Component	Paint Color (surface)	Substrate	Sample Location	Results (pmm lead)
P-01	Pump	Red	Metal	4' W of roof door	70
P-02	Support Column	Grey	Metal	On column 3' S of red pumps	1,200
P-03	Chiller	Beige	Metal	On ERC-1 Heat Rec Chiller	ND
P-04	Air compressor	Blue	Metal	Air compressor 2' N of ERC-1	610
P-05	Units on roof	Beige	Metal	On units on roof	84
P-06	Stands	Silver	Metal	On stands holding up lines on roof	ND
P-07	Base of red pumps	Yellow	Metal	On base of red pumps 3' W of roof door	2,100
P-08	Expansion tank above door	Red	Metal	Above door to roof	ND

ND: (Lead) not detected above the analytical detection limit

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Attachment B
Laboratory Analytical Report
&
Sample Chain of Custody