

Lead-Based Paint Risk Assessment Report

For the Dwelling Located at:

Glenda McKinney
2619 E. Admiral Ct.
Tulsa OK 74110
36.161770 N, 95.952840 W
Built in: 1918

Prepared For:

Cherokee Nation Housing Rehabilitation
Using ODEQ, EPA and CN Work Practice Standards
Established in 40 CFR 745-227

Lab Analysis by Quantem Laboratories
AIHA-ELLAP 101352
2033 Heritage Park Dr.
Oklahoma City, OK
(405) 775-7272

By:

C. Nick Clark, Certified Risk Assessor
P.O. Box 948
Tahlequah, OK 74465
(918) 316-7451
Heuresis Pb200i
SN: 2312

Signature: _____

C. Nick Clark

Date: _____

2-23-21

OK Firm No.: OKFIRM11198
CN Firm No.: CNFIRM00001

OK License No.: OKRASR13910
CN License No.: CNRASR00036

Table of Contents

Part I: Identifying Information

Identity of dwelling(s) covered by report, identity of property(ies).

1. Risk Assessor, Name of Certificate (or License) and Number and State issuing certificate/license.
2. Property Owner Name, Address, and Phone Number.
3. Date of Report, Date of Environmental Sampling.

Part II: Completed Management, Maintenance, and Environmental Results Forms and Analyses

4. List of Location and Type of Identified Lead Hazards including and indication of which hazards are priorities (this summary should be suitable for use as notification to residents).
5. Optional Management Information (Form 5.6) (not required if all dwellings were sampled).
6. Maintenance/Paint Condition Information (Form 5.2 or 5.7)
7. Building Condition (Form 5.1)
8. Brief Narrative Description of Dwelling Selection Process (not required if all dwellings were sampled).
9. Analysis of Previous XRF Testing Report (if applicable).
10. Deteriorated Paint Sampling Results (Form 5.3 or 5.3a)
11. Dust Sampling Results (Form 5.4 or 5.4a)
12. Soil Sampling Results (Form 5.5)
13. Other Sampling Results (if applicable)

Part III: Lead Hazard Control Plan

14. Lead-Based Paint Policy Statement (not applicable for homeowners).
15. Name of individual in Charge of Lead-Based Paint Hazard Control Program.
16. Recommended Changes to Work Order System and Property Management (optional, not applicable for homeowners or property owner without work order systems).
17. Acceptable Interim Control Options for This Property and Estimated Costs.
18. Acceptable Abatement Options for This Property.
19. Reevaluation Schedule (if applicable).
20. Interim Control/Abatement to Be Implemented in This Property.
21. A Training Plan for Managers, Maintenance Supervisors, and Workers (this should include named individuals), if applicable.
22. Method of Resident Notification of Results of Risk Assessment and Lead Hazard Control Program (not applicable for homeowners). Note: This section should include a discussion of how residents are to be educated about lead poisoning, *before* the risk assessment results are released.
23. Signature (Risk Assessor) and Date.
24. All laboratory raw data.

Part IV: Appendix

Part I: Identifying Information

Glenda McKinney
 2619 E. Admiral Ct.
 918-740-3365
 36.161770 N, -95.952840 W
 Built in: 1918

Part II: Results

List of location and type of identified lead hazards:

Deteriorated Lead-Based Paint (Hazards):

Read #	Conc. Units	3 SD	Result	Nom ✓ Secs	Date	Time	Room	-->RoomChoi	Structure	-->Membe	Substrate	Wall	Cond.
108	2.2 mg/cm2	0.3	Positive	2	2/5/2021	14:35:12	Apartment	Bedroom 1	Window	Sill	Wood3	D1	Peeling
129	2.7 mg/cm2	0.3	Positive	2	2/5/2021	14:48:23	Apartment	Bathroom	Room	Wall	Drywall2	B1	Cracking
130	3.2 mg/cm2	0.3	Positive	2	2/5/2021	14:48:44	Apartment	Bathroom	Room	Wall	Drywall3	C1	Cracking
134	1.4 mg/cm2	0.3	Positive	3	2/5/2021	14:52:09	Apartment	Bathroom	Room	Baseboard	Wood1	B1	Cracking
137	9.3 mg/cm2	0.3	Positive	2	2/5/2021	14:56:55	Exterior	Front Porch	Porch	Ceiling	Wood2	A3	Cracking
138	11.8 mg/cm2	0.3	Positive	2	2/5/2021	14:57:26	Exterior	Front Porch	Porch	Header	Wood3	A4	Cracking
139	13.2 mg/cm2	0.3	Positive	2	2/5/2021	14:57:51	Exterior	Front Porch	Porch	Column	Wood4	A5	Cracking
141	9 mg/cm2	0.3	Positive	2	2/5/2021	14:59:07	Exterior	House	Window	Sill	Wood6	A7	Peeling
145	3.5 mg/cm2	0.3	Positive	2	2/5/2021	15:02:17	Exterior	House	Window	Sill	Wood10	B2	Peeling
147	1.4 mg/cm2	0.2	Positive	4	2/5/2021	15:03:35	Exterior	House	Window	Ap on	Wood12	C2	Peeling
148	1.6 mg/cm2	0.3	Positive	2	2/5/2021	15:04:07	Exterior	House	Room	Wall	Wood13	C3	Cracking
153	1.6 mg/cm2	0.3	Positive	2	2/5/2021	15:09:59	Exterior	House	Soffit		Wood4	C8	Cracking
154	2.9 mg/cm2	0.3	Positive	2	2/5/2021	15:10:25	Exterior	House	Fascia		Wood5	C9	Cracking
155	2.8 mg/cm2	0.3	Positive	2	2/5/2021	15:11:54	Exterior	House	Window	Sill	Wood6	D1	Cracking
156	3.2 mg/cm2	0.3	Positive	2	2/5/2021	15:12:16	Exterior	House	Window	Sill	Wood7	D2	Cracking

Lead in Dust Hazards:

- Living Room Window Trough
- Kitchen Window Sill
- Kitchen Window Trough
- Bedroom 2 Window Trough
- Bathroom Window Sill
- Bathroom Window Trough

Lead in Soil Hazards:

- Dripline

A few other painted surfaces that have not been tested for lead are in “poor” condition and should be repainted within the next year before further deterioration occurs. However, these surfaces are not considered to be immediate “hazards,” using criteria in the 2012 HUD Guidelines for the Evaluation and Control of Lead-Based Paint Hazards in Housing. Those surfaces are:

NA

There has not been any previous lead-based paint testing at this dwelling, although a lead-based paint inspection of all painted surfaces is recommended so that potential lead problems can be monitored before they become hazardous.

Soil lead levels were all below 400 ug/g. Current EPA and HUD Guidance for soil is 400ug/g for bare play areas and 1,200 ug/g for other areas. Using these criteria, soil is not a hazard at this property.

The owner has decided to select the following hazard control measures, which are all acceptable based on HUD's *Guidelines for the Evaluation and Control of Lead-Based Paint Hazards in Housing*:

Reevaluation: Standard Reevaluation Schedule 3 contained in the HUD Guidelines does apply to this property, since one of the rooms had a dust lead level greater than the standard. Therefore, the dwelling should be reevaluated in 2/5/2022 (12 months from now). If no lead-based paint hazards are identified at this time, no further reevaluations are needed. However, since lead-based paint may be present in the dwelling, the owner should monitor the condition of all painted surfaces at least annually or whenever other information indicates a potential problem.

Building Condition Form

CONDITION	YES	NO
Roof Missing Parts of Surfaces (tiles, boards, etc.)		X
Roof Has Holes or Large Cracks		X
Gutter or Downspouts Broken	X	
Chimney Masonry cracked, bricks loose or missing, obviously out of plumb		X
Exterior or interior walls have obvious large cracks or holes, requiring more than routine painting	X	
Exterior siding has missing boards or shingles	X	
Water stains on interior walls or ceilings		X
Plaster walls deteriorated		X
Two or more windows or doors broken, missing, or boarded up		X
Porch or steps have major elements broken, missing, or boarded up		X
Foundation has major cracks, missing material, structural leans, or visibly unsound		X
Total	3	8

If the "Yes" column has 2 or more checks, the dwelling is considered to be in poor condition for the purposes of a risk assessment. However, specific conditions and extenuating circumstances should be considered before determining final condition of the building and the appropriateness of a lead hazard screener.

Notes:

Overall, the home is in poor condition.

- 8. Dwelling Selection Process N/A
- 9. Analysis of Previous XRF Testing Report N/A

Field Sampling Form for Deteriorated Paint

Name of Risk Assessor Nick Clark
 Name of Property Owner Glenda McKinney
 Property Address 2619 E. Adiral Ct. Tulsa, OK 74110
 Sampling Protocol single family

Target Dwelling Criteria (Check All That Apply)

- Code Violations
- Judged to be in Poor Condition
- Presence of 2 or More Children between Ages of 6 Months and 6 Years
- Serves as Day-Care Facility
- Recently Prepared for Reoccupancy
- Random Sampling XRF SN 2312
- None of the above

Read #	Conc.	Units	3 SD	Result	Nom Secs	Date	Time	Room	-->RoomChoice	Structure	-->Member	Substrate	Wall	Cond.
108	2.2	mg/cm2	0.3	Positive	2	2/5/2021	14:35:12	Apartment	Bedroom 1	Window	Sill	Wood3	D1	Peeling
129	2.7	mg/cm2	0.3	Positive	2	2/5/2021	14:48:23	Apartment	Bathroom	Room	Wall	Drywall2	B1	Cracking
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156	3.2	mg/cm2	0.3	Positive	2	2/5/2021	15:12:16	Exterior	House	Window	Sill	Wood7	D2	Cracking

Sample all layers of paint, not just deteriorated paint layers

Total Number of Samples This Page 15

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Date of Sample Collection 2/5/2021

Field Sampling

Form for Dust

Sample Number	Room (Record Name of Room Used by the Owner or Resident)	Surface Type	Is Surface Smooth and Cleanable?	Dimension ¹ of Sample Area (inches x inches)	Area (in ²)	Result of Lab Analysis (ug/ft ²)
01	Living Room	Floor	Yes	12x12	144	<5.0
02	Living Room	WS	Yes	2.50 x 33	82.50	53
03	Living Room	WT	Yes	3 x 31	93	1000
04	Kitchen	Floor	Yes	12x12	144	<5.0
05	Kitchen	WS	Yes	3.25 x 27.50	89.38	110
06	Kitchen	WT	Yes	2 x 24.50	49	2700
07	Bedroom 2	Floor	Yes	12x12	144	<5.0
08	Bedroom 2	WS	Yes	2.75 x 33.50	92.13	18
09	Bedroom 2	WT	Yes	3 x 30.25	90.75	1200
10	Bathroom	Floor	Yes	12x12	144	<5.0
11	Bathroom	WS	Yes	2.50 x 23	57.50	870
12	Bathroom	WT	Yes	1.50 x 205.50	30.75	2200

¹ Measure to the nearest 1/16 inch

Total Number of Samples This Page 12

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Date of Sample Collection 2/5/2021 Date shipped to lab 2/8/2021

Shipped by C. Nick Clark Received by EMSL Analytical Staff C. Nick Clark
 (signature) (signature)

HUD Standards: 10 ug/ft² (floors), 100 ug/ft² (interior window sills), 400 ug/ft² (window troughs)

Field Sampling Form For Soil

(Composite Sampling Only)

Name of Risk Assessor C. Nick Clark

Name of Property Owner Glenda McKinney

Property Address 2619 E. Admiral Ct. Tulsa, OK 74110

SAMPLE NO.	LOCATION	BARE OR COVERED	LAB RESULTS ug/g
13	Drip Line	Bare	200

Collect only the 1/2" of soil

Total Number of Samples This Page 1

Page 1 of 1

Date of Sample Collection 2/5/2021 Date Shipped to lab 2/8/2021

Shipped by C. Nick Clark Received by EMSL Analytical
(signature) (signature)

13. Other Sampling Results N/A

Part III: Lead Hazard Control Options

14. Lead-Based Paint Policy Statement

On file CNEP and Cherokee Nation Housing Rehab

15. Name of Individual in Charge of Lead-Based Paint Hazard Control Program:

Cherokee Nation Housing Rehab - George Hubbard: 918-456-5482 ext. 1263

16. Recommended Changes to Work Order System and Property Management

The existing work order system is an informal verbal one. If painted surfaces will be disturbed during a particular repair job, the painted surface should be tested to determine if it has lead-based paint on it. If it does (or if testing is not completed), the maintenance worker should take the necessary precautions by wetting down the surface and performing cleanup. If the surface area is large or if the work will generate a significant amount of dust, clearance testing should be completed before residents move back into the room. The table below can be used as a general guide in determining whether maintenance jobs are likely to be high risk or low risk.

When work is assigned, the owner or worker should determine whether the job is low or high risk and adopt protective measures as needed.

**Table 17.1 (Taken from HUD Guidelines)
Summary of Low- and High-Risk Job Designations for Surfaces Known or Suspected to Have Lead-Based Paint**

Job Description	Low Risk	High Risk
Repainting (includes surface Preparation)		√
Plastering or wall repair		√
Window repair		√
Water or moisture damage repair (repainting and plumbing)		√
Door repair	√	
Building component replacement		√
Welding on Painted Surfaces		√
Door lock repair or replacement	√	
Electrical fixture repair	√	
Floor refinishing		√
Carpet replacement		√
Groundskeeping	√	
Radiator leak repair	√	

Baluster repair (metal)		√
Demolition		√

- **High-risk jobs typically disturb more than 2 square feet per room. If these jobs disturb less than 2 square feet, then they can be considered low-risk jobs.**

Table 17.2

	Low Risk	High Risk
Worksite preparation with plastic sheeting (6 mil thick)	Plastic sheet no less than 5 feet immediately underneath work area	Whole floor, plus simple airlock at door or tape door shut
Children kept out of work area	Yes	Yes
Resident relocation during work	No	Yes
Respirators	Probably not necessary*	Recommended
Protective clothing Note: Protective shoe coverings are not to be worn on ladders, scaffolds, etc.	Probably not necessary*	Recommended
Personal hygiene (enforced hand washing after job)	Required	Required
Showers	Probably not necessary	Recommended
Work practices	Use wet methods, except near electrical circuits	Use wet methods, except near electrical circuits
Cleaning	Wet cleaning with lead-specific detergent trisodium phosphate or other suitable detergent around the work area only (2 linear feet beyond plastic)	HEPA vacuum/wet wash/HEPA vacuum the entire work area
Clearance	Visual examination only	Dust sampling during the preliminary phase of the maintenance program and periodically thereafter (not required for every job)

- **Employers must have objective data showing that worker exposures are less than the OSHA Permissible Exposure Limit of 50ug/m3 if respirators and protective clothing will not be provided.**

17. Interim Control Options and Estimated Costs

The costs shown below include labor, materials, worker protection, site containment and cleanup. These are only very rough estimates that may not be accurate; a precise estimate should be obtained from a certified lead-based paint abatement contractor. I would be pleased to perform clearance testing after this work has been completed at your request.

Lead-Based Paint Hazards:

Hazards –

Read #	Conc. Units	3SD	Result	Nom Secs	Date	Time	Room	-->RoomChoice	Structure	-->Member	Substrate	Wall	Cond.
108	2.2 mg/cm2	0.3	Positive	2	2/5/2021	14:35:12	Apartment	Bedroom 1	Window	Sill	Wooc3	D1	Peeling
129	2.7 mg/cm2	0.3	Positive	2	2/5/2021	14:48:23	Apartment	Bathroom	Room	Wall	Drywall2	B1	Cracking
130	3.2 mg/cm2	0.3	Positive	2	2/5/2021	14:48:44	Apartment	Bathroom	Room	Wall	Drywall3	C1	Cracking
134	1.4 mg/cm2	0.3	Positive	3	2/5/2021	14:52:09	Apartment	Bathroom	Room	Baseboard	Wooc1	B1	Cracking
137	9.3 mg/cm2	0.3	Positive	2	2/5/2021	14:56:55	Exterior	Front Porch	Porch	Ceiling	Wooc2	A3	Cracking
138	11.8 mg/cm2	0.3	Positive	2	2/5/2021	14:57:26	Exterior	Front Porch	Porch	Header	Wooc3	A4	Cracking
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141	9 mg/cm2	0.3	Positive	2	2/5/2021	14:59:07	Exterior	House	Window	Sill	Wooc6	A7	Peeling
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156	3.2 mg/cm2	0.3	Positive	2	2/5/2021	15:12:16	Exterior	House	Window	Sill	Wooc7	D2	Cracking

Wet scrape and Repaint

Lead Dust Hazards:

- Hazard A. Living Room WT – Hepa Vac, Wet Mop, Hepa Vac
- Hazard B. Kitchen WS - Hepa Vac, Wet Mop, Hepa Vac
- Hazard C. Kitchen WT - Hepa Vac, Wet Mop, Hepa Vac
- Hazard D. Bedroom 2 WT - Hepa Vac, Wet Mop, Hepa Vac
- Hazard E. Bathroom WS - Hepa Vac, Wet Mop, Hepa Vac
- Hazard F. Bathroom WT - Hepa Vac, Wet Mop, Hepa Vac

Lead Soil Hazards:

- Hazard A. Dripline – No hazard exists

18. Acceptable Abatement Options

Lead-Based Paint Hazards

Hazard A:

Read #	Conc. Units	3SD	Result	Nom ✓ Secs	Date	Time	Room	-->RoomChoi	Structure	-->Membe	Substrat	Wall	Cond.
108	2.2 mg/cm2	0.3	Positive	2	2/5/2021	14:35:12	Apartment	Bedroom 1	Window	Sill	Wood3	D1	Peeling
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156	3.2 mg/cm2	0.3	Positive	2	2/5/2021	15:12:16	Exterior	House	Window	Sill	Wood7	D2	Cracking

Remove and Replace – All listed

Enclose or encapsulate – Window sills, walls, baseboards, porch ceiling, porch header, porch column, window apron, soffit, and fascia.

Lead Dust Hazards:

- Hazard A. Living Room Window Trough – Hepa Vacuum, Wet Mop, Hepa Vacuum
- Hazard B. Kitchen Window Sill - Hepa Vacuum, Wet Mop, Hepa Vacuum
- Hazard C. Kitchen Window Trough - Hepa Vacuum, Wet Mop, Hepa Vacuum
- Hazard D. Bedroom 2 Window Trough - Hepa Vacuum, Wet Mop, Hepa Vacuum
- Hazard E. Bathroom Window Sill - Hepa Vacuum, Wet Mop, Hepa Vacuum
- Hazard F. Bathroom Window Trough - Hepa Vacuum, Wet Mop, Hepa Vacuum

Lead Soil Hazards:

- Hazard A. Dripline – No hazards exist

19. Reevaluation and Monitoring Schedule

Each of these treatments will need to be reexamined periodically to make certain that they remain effective and to ensure that new lead-based paint hazards do not appear. The interim controls shown above are less expensive initially, but they may be more expensive in the long run since they need to be reevaluated more frequently. The replacement and paint removal methods are more expensive initially, but do not require any reevaluation.

The owner should monitor the condition of the paint at least annually or if there is some indication that paint might be failing. A professional reevaluation is also needed. The standard schedule for reevaluation the dwelling is shown above.

Reevaluation: Standard Reevaluation Schedule 3 contained in the HUD Guidelines applies to this property, since one of the rooms had a dust lead level greater than the standard. Therefore, the dwelling should be

Certificate of Lead-Based Paint Compliance

I hereby certify that on _____ the dwelling located
at _____ meets the criteria established by the
Department of Housing and Urban Development for lead safety. Either no lead-based paint
hazards were identified or all lead-based paint hazards have been corrected.

Owner

C. Nick Clark

Authorized Inspector

Risk Assessor License # OKRASR13910

Expiration Date: March 31, 2021

**Cherokee Nation
Environmental Programs**