

# Lead-Based Paint Risk Assessment Report

For the Dwelling Located at:

Beverly Dugger  
918-696-6847  
605 Allison Ave.  
Stilwell, OK 74960  
N 35.82008 W. 94.63284  
Built: 1970

Prepared For:

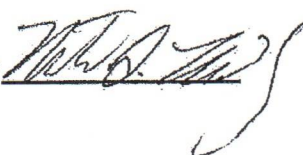
**Cherokee Nation Housing Rehab**  
Using ODEQ, EPA and CN Work Practice Standards  
Established in 40 CFR 745-227

**Lab Analysis by**  
EMSL Analytical, INC.  
3029 S. Jefferson  
Saint Louis, MO 63118  
Phone: (314) 577-0150 Fax: (314) 776-3313

By:  
**Michael Miley, Certified Risk Assessor**  
Expiration: March 31, 2012  
P.O. Box 948  
Tahlequah, OK 74465  
(918) 453-5009  
Niton Model #: XLp300A 26524

OK Risk Assessor OKRASR13521  
OK Firm OKFIRM11198  
CN Firm CNFIRM00001  
CN Risk Assessor CNRASR00030

Date: 9/27/12

Signature: 

## Table of Contents

### Summary

#### **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 and Estimated Costs.
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

For the Dwelling Located at:

Beverly Dugger  
918-696-6847  
605 Allison Ave.  
Stilwell, OK 74960  
N 35.82008 W. 94.63284  
Built: 1970

### Part II: Results

#### List of Location and Type of Identified Lead Hazards

Reading	Component	Substrate	Side	Color	Room	PbC
52	WALL	WOOD	A	BLUE	OUTSIDE	1.6
53	SOFFIT	WOOD	A	BLUE	OUTSIDE	1.2
54	FASCIA	WOOD	A	BLUE	OUTSIDE	2.1
55	CEILING	WOOD	A	BLUE	OUTSIDE	1.7
57	WINDOW CASING	WOOD	A	BLUE	OUTSIDE	1.4
58	GABLE	WOOD	A	BLUE	OUTSIDE	1.8
59	WALL	WOOD	B	BLUE	OUTSIDE	1.7
60	CORNER BOARD	WOOD	B	BLUE	OUTSIDE	1.4
62	DOOR CASING	WOOD	B	BLUE	OUTSIDE	1.2
63	WALL	WOOD	C	BLUE	OUTSIDE	1.2
66	WALL	WOOD	D	BLUE	OUTSIDE	1.4

A few other painted surfaces that have not been tested for lead are in "fair" 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 1995 *HUD Guidelines for the Evaluation and Control of Lead-Based Paint Hazards in Housing*. Those surfaces are:

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 400ug/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 applies to this property, since one of the rooms had a dust lead level greater than the standard. Therefore, the dwelling should be reevaluated in N/A (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

## Resident Questionnaire

### Children/Children's Habits

1. (a) Do you have any children that live in your home? Yes        No X  
 (b) If yes, how many?        Ages?         
 (c) Record blood lead levels, if known

IF NO CHILDREN, SKIP TO Q.5

2. Locate the rooms/areas where each child sleeps, eats, and plays.

Name of Child	Location of Bedroom	Location of All Rooms Where Child Eats	Primary Location Where Child Plays Indoors	Primary Location Where Child Plays Outdoors

3. Where are toys stored/kept?
4. Is there any visible evidence of chewed or peeling paint on the wood work, furniture, or toys? Yes        No

### Family Use Patterns

5. Which entrances are used most frequently? A side entrance
6. Which windows are opened most frequently? Kitchen, Bedroom
7. Do you use window air conditioners? If yes, where? No X  
 (Condensation often causes paint deterioration)
8. (a) Do any household member engage in gardening? Yes        No X  
 (b) Record the location of any vegetable garden.         
 (c) Are you planning any landscaping activities that will remove grass or ground covering? Yes        No X
9. (a) How often is the household cleaned? Daily  
 (b) What cleaning methods do you use? Soap and water
10. (a) Did you recently complete any building renovations? Yes        No X



- (b) If yes, where? \_\_\_\_\_  
 (c) Was building debris stored in the yard? If yes, where? \_\_\_\_\_  
 11. Are you planning any building renovations? Where? \_\_\_\_\_ No ☒ X  
 12. (a) Do any household members work in a lead-related industry? Yes \_\_\_\_\_ No ☒ X  
 (b) If yes, where are dirty work clothes placed and cleaned? \_\_\_\_\_

### Building Condition Form

CONDITION	YES	NO
Roof Missing Parts of Surfaces (tiles, boards, etc.)	<input checked="" type="checkbox"/> X	
Roof Has Holes or Large Cracks	<input checked="" type="checkbox"/> X	
Gutter or Downspouts Broken	<input checked="" type="checkbox"/> X	
Chimney Masonry cracked, bricks loose or missing, obviously out of plumb		<input checked="" type="checkbox"/> X
Exterior or interior walls have obvious large cracks or holes, requiring more than routine painting	<input checked="" type="checkbox"/> X	
Exterior siding has missing boards or shingles		<input checked="" type="checkbox"/> X
Water stains on interior walls or ceilings	<input checked="" type="checkbox"/> X	
Plaster walls deteriorated		<input checked="" type="checkbox"/> X
Two or more windows or doors broken, missing, or boarded up		<input checked="" type="checkbox"/> X
Porch or steps have major elements broken, missing, or boarded up		<input checked="" type="checkbox"/> X
Foundation has major cracks, missing material, structural leans, or visibly unsound	<input checked="" type="checkbox"/> X	
Total	6	5

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 screen.

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 Michael Miley

Name of Property Owner Beverly Dugger

Property Address 605 Allison Ave. Stilwell, OK 74960

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
- ☐ None of the above

**XRF 9/4/2012**

**Please see summary report of lead paint inspection on next page**

Reading	Component	Substrate	Side	Color	Room	PbC
52	WALL	WOOD	A	BLUE	OUTSIDE	1.6
53	SOFFIT	WOOD	A	BLUE	OUTSIDE	1.2
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63	WALL	WOOD	C	BLUE	OUTSIDE	1.2
66	WALL	WOOD	D	BLUE	OUTSIDE	1.4

Sample all layer of paint, not just deteriorated paint layers

Total Number of Samples This Page 11

Page 1 of 1

Date of Sample Collection 9/4/2012 Date shipped to lab

Shipped by

(signature )

Received by

(signature)



# Field Sampling Form For Dust (Single Surface)

Sample Number	Room (Record Name of Room Used by the Owner or Resident)	Surface Type	Is Surface Smooth and Cleanable?	Dimension <sup>1</sup> of Sample Area (inches x inches)	Area (In2)	Result of Lab Analysis (ug/ft <sup>2</sup> )

<sup>1</sup> Measure to the nearest 1/8 inch

Total Number of Samples This Page 0

Page 1 of 1

Date of Sample Collection 9/4/2012 Date shipped to lab

Shipped by Michael Miley  
(signature)

Received by EMSL  
(signature)

HUD Standards: 40 ug/ft<sup>2</sup> (floors), 250 ug/ft<sup>2</sup> (interior window sills), 400 ug/ft<sup>2</sup> (window troughs)

Field Sampling Form For Soil  
(Composite Sampling Only)

Name of Risk Assessor Michael Miley  
Name of Property Owner Beverly Dugger  
Property Address 605 Allison Ave. Stilwell, OK 74960

SAMPLE NO.	LOCATION	BARE OR COVERED	LAB RESULTS mg/Kg
1	Dripline	Covered	200

Collect only the ½" of soil

Total Number of Samples This Page 1

Page 1 of 1

Date of Sample Collection 9/4/2012 Date shipped to lab 9/6/2012

Shipped by Michael Miley  
(signature)

Received by EMSL  
(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)**

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 or not 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**

<b>Job Description</b>	<b>Low Risk</b>	<b>High Risk</b>
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**

	<b>Low Risk</b>	<b>High Risk</b>
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/m<sup>3</sup> 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.

Hazard	Component	Side	Room	Recommendations
A	WALL	A	OUTSIDE	Wet scrape and repaint
B	SOFFIT	A	OUTSIDE	Wet scrape and repaint
C	FASCIA	A	OUTSIDE	Wet scrape and repaint
D	CEILING	A	OUTSIDE	Wet scrape and repaint
E	WINDOW CASING	A	OUTSIDE	Wet scrape and repaint
F	GABLE	A	OUTSIDE	Wet scrape and repaint
G	WALL	B	OUTSIDE	Wet scrape and repaint
H	CORNER BOARD	B	OUTSIDE	Wet scrape and repaint
I	DOOR CASING	B	OUTSIDE	Wet scrape and repaint
J	WALL	C	OUTSIDE	Wet scrape and repaint
K	WALL	D	OUTSIDE	Wet scrape and repaint

### 18. Acceptable Abatement Options and Estimated Costs

Hazard	Component	Side	Room	Recommendations
A	WALL	A	OUTSIDE	Remove and Replace
B	SOFFIT	A	OUTSIDE	Remove and Replace
C	FASCIA	A	OUTSIDE	Remove and Replace
D	CEILING	A	OUTSIDE	Remove and Replace
E	WINDOW CASING	A	OUTSIDE	Remove and Replace
F	GABLE	A	OUTSIDE	Remove and Replace
G	WALL	B	OUTSIDE	Remove and Replace
H	CORNER BOARD	B	OUTSIDE	Remove and Replace
I	DOOR CASING	B	OUTSIDE	Remove and Replace
J	WALL	C	OUTSIDE	Remove and Replace
K	WALL	D	OUTSIDE	Remove and Replace

### 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 reevaluated in N/A 12 months from now). If no lead-based paint hazards are identified at that time, another reevaluation should be conducted in N/A (2 years later). If no lead-based paint hazards are identified at that 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.

#### **Part IV: Site Specific Lead Hazard Control Plan**

20. Lead Hazard Control Option To Be Implemented in This Property

**I recommend abatement options be implemented on all areas with Lead Based Paint**

21. Training Plan for Managers, Maintenance Supervisors and Workers

**On File at Cherokee Nation Housing Rehab**

22. Method of Resident Notification of Results of Risk Assessment and Lead Hazard Control Program

**In Person by Cherokee Nation Housing Rehab**

23. Signatures (Risk Assessor and Owner), Date and Certificate of Lead-Based Paint Compliance

\_\_\_\_\_  
Owner Signature

\_\_\_\_\_  
Date

  
\_\_\_\_\_  
Certified Risk Assessor Signature

9/27/12  
\_\_\_\_\_  
Date