

Lead-Based Paint Abatement Plan

**39 Warham Street
Windsor, CT**

**Town of Windsor Housing
Rehabilitation Loan Program
Windsor Connecticut**

January 11, 2023

**EnviroPlan LLC
27 Trotwood Dr.
West Hartford, CT
06117**

January 11, 2023

Flavia Rey de Castro
Community Development Specialist
Town of Windsor
275 Broad Street
Windsor, CT 06095

RE: Lead Based Paint Abatement Plan
39 Warham St., Windsor, CT
EnviroPlan Project No. 2019-152-11

Dear Ms. Rey de Castro:

Enclosed please find the Lead-Based Paint Abatement Plan required for the above-referenced site. The plan has been prepared in accordance with the requirements of Title X 1012/1013 regulations 24 CFR Part 35. For the purpose of this abatement plan, all defective paint containing toxic levels of lead located within the dwelling unit, the basement, and the exterior of this two family house, are included

If you have any questions regarding the contents of the Plan, please do not hesitate to contact us.

Sincerely,



Neal B. Freuden
President
Connecticut Certified Lead Inspector/Risk Assessor 000152
Connecticut Certified Lead Planner Project Designer 000989
EPA Certified Lead Abatement Supervisor
EPA Certified Lead Safe Renovator
EPA Certified Instructor for the following Courses: Lead Inspector, Risk Assessor, Planner
Project Designer, Abatement Supervisor and Renovator.

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Attachments

End of Report

EXHIBIT 1 - HOUSE FLOOR DIAGRAMS

1 Introduction

Work outlined in this Section includes the lead paint abatement required by the Housing and Urban Development (HUD) standards for all components and surfaces containing toxic levels of lead paint in a defective condition. The work shall be conducted in conformance with HUD regulations (24 CFR, Part 35, et al.). The work is being conducted to satisfy the requirements of federal HUD standards. Testing was conducted in accordance with HUD and State of Connecticut requirements.

2 HUD Program Requirements

The property is part of the following programs:

- HUD Rehabilitation Assistance Program Category 3 (over \$25,000 per unit or in the case of a two family house, over \$50,000 for the house, including all interior and exterior surfaces)

The more stringent requirements associated with the HUD Rehabilitation Assistance Program have been utilized in the preparation of this plan. The program requires the following:

- Distribution of pamphlet
- Risk Assessment of the property
- Abatement of Lead Hazards
- Clearance sampling following lead work
- Notice to occupants of lead remaining in dwelling units
- Ongoing Lead Paint maintenance

3 Property Information

Property Address: 39 Warham St.
Windsor, Connecticut

4 Lead Consultant Contractor

Name: EnviroPlan LLC
Address: 27 Trotwood Dr.
West Hartford, Connecticut 06117
License Number 002085

5 Lead Inspector/Risk Assessor

Inspector/Risk Assessor's Name: Neal B. Freuden
Certificate Number: 000152
Date of Testing: November 8, 2021

Inspection/Risk Assessment Methodology: On-site x-ray fluorescence utilizing an RMD spectrum analyzer was used for the inspection. Testing performed in accordance with HUD Guidelines and State of Connecticut regulations. Dust wipe and bare soil samples were collected as a part of the risk assessment.

Clearance inspection will entail a visual of abatement work and if satisfactory, the collection of dust wipe samples.

6. Lead Planner Project Designer

Name: Neal B. Freuden
Firm/Address: EnviroPLan LLC
27 Trotwood Dr.
West Hartford, Connecticut 06117
Certificate Number: 000989

7 Preparation prior to Work

- A. Post Warning Signs - Warning signs shall be posted at all entrances and exits to the work area.
- B. Repair work prior to abatement shall include but not be limited to repair of defective plaster walls and ceilings.
- C. Residents may remain in the house during the abatement but must stay out of the work areas and must have access to the bathroom.

5.

8 Lead Paint Abatement Procedures

Lead paint abatement is defined as any set of measures designed to permanently eliminate lead based paint or lead based paint hazards. Abatement work included herein is required due to the condition of components and surfaces.

The following containment preparations and work practices are recommended for use during lead paint abatement procedures in accordance with Connecticut regulation 19a-111. The following procedures shall apply for all work involving the complete abatement of lead paint.

A. Interior Preparation

1. Moveable objects belonging to residents must be removed from the abatement area. The belongings should be stored in an easily accessible location.
2. Cover and seal all non-work surfaces with 6-mil polyethylene as follows:
 - a. non-movable objects
 - b. air system(s) heating, ventilation, air conditioning (HVAC)
 - c. entrances to abatement areas
 - d. floors (2 layers)
3. Signage. Prior to the preparation of a dwelling for abatement, the Contractor shall place warning signs immediately outside all entrances and exits to the work area, warning that de-leading work is being conducted in the vicinity. The signs shall be at least 20" x 14" and read:

**WARNING:
LEAD PAINT REMOVAL HAZARD
UNAUTHORIZED ENTRY PROHIBITED
NO SMOKING, EATING, OR DRINKING
ALLOWED IN THE WORK AREA**

Signs shall be in bold lettering with lettering not smaller than two inches (2") tall.

4. Construct and maintain suitable polyethylene barriers within the building to isolate the work.
5. Construct mini-containment chambers in order to facilitate abatement in lieu of preparing entire rooms for abatement. Seal the mini-containment chamber to the interior wall a minimum of six inches (6") from the component. Seal walls of the chamber to the two layers of six-mil polyethylene. Cover the ceiling with one (1) layer of six-mil polyethylene. A pre-fabricated airtight containment system may be used if approved by the Consultant.
- 6.

6. Maintain polyethylene barriers, as long as needed for the safe and proper completion of the work. Any breaches in the work area barriers shall be corrected immediately and as necessary during the working day with such breaches reported immediately to the Owner.

B. Exterior Preparation:

1. Exterior abatement work shall require the installation of protective sheeting consisting of six-mil polyethylene sheeting from the foundation to at least 10 feet and if the property is a mid to high rise building, the sheeting should be extended to 20 feet. If the structure is less than 10 feet from the street or an adjacent property, vertical shrouds should be installed.

Build a small curb at perimeter of sheeting to contain any paint chips or dust. Doors and windows within 20'-0" of the work area at the level where work is taking place and all levels below, should be closed and sealed with protective sheeting.

2. Lead abatement workers should use protective shoe covers, tack pads or have available cleaning materials to wipe off shoes prior to stepping off of the protective sheeting.

C. Abatement Procedures

General

- D. Care must be taken so that leaded materials are not burned or abraded resulting in exposure to workers.
- E. Care shall be taken to avoid damage to adjacent areas during component removal procedures. The Contractor shall run a utility knife around the edge (score) of the component to cut any bonding between substrates.
- F. If components to be removed or enclosed contain areas of loose or peeling paint, these areas shall be wet scraped and HEPA vacuumed prior to abatement.
- G. All paint chips, debris, or components shall be temporarily containerized or wrapped for transport to appropriate waste disposal dumpsters.
- H. The following general abatement techniques shall be utilized in accordance with specific requirements of lead paint Scope of Work prepared for the site.

- a. Replacement means removing components such as windows, doors, and trim that have lead painted surfaces and installing new components free of lead paint. Replacement components as specified elsewhere.
- b. Rigid Encapsulation (enclosure): refers to processes that make lead paint inaccessible, by forming a barrier between lead based paint and the environment. The following are some types of rigid durable construction materials: gypsum dry wall, fiberglass, wood and vinyl siding. Materials must be mechanically fastened with seams sealed to prevent escape of lead dust. Provide extension plates at electrical outlets and switches as necessary.
- c. Liquid Encapsulation: means the application of a covering or coating that acts as a barrier between the lead based paint and the environment that relies for its durability on adhesion between the encapsulant and the painted surface, and the integrity of the existing bonds between paint layers and between the paint and the substrate. Encapsulants are liquid (flexible) or cementitious coatings that provide a long lasting barrier over lead paint. An encapsulant prevents lead paint from becoming part of household dust or accessible to occupants.
- d. Paint removal means stripping lead paint from the surfaces of components. The following are some of the paint removal processes that can be used; chemical stripping, mechanical stripping, and wet scraping.
 - **Chemical stripping**: Chemical strippers shall be applied in accordance with manufacturer’s recommendations. Additional worker protection may be required when utilizing caustics.
 - **Mechanical stripping**: includes needle guns, belt and rotary sanders, abrasive blasting equipment. Mechanically powered abatement equipment requires the use of HEPA-equipped vacuum attachments to remove dust generated during the use of the equipment.
 - **Wet scraping**: involves misting the peeling paint before scraping and thus reducing the amount of lead dust generated during this process.
 - **Heat gun**: To prevent vaporization of the lead contained in the paint, the temperature of the heat gun should not exceed 700 degrees Fahrenheit in accordance with Connecticut regulations.

D. Worker Protection and Training

- E. Workers who will perform abatement work must have completed one of the following training courses:
 - EPA Lead Abatement Supervisor (40 hours)
 - EPA Lead Abatement Worker (32 hours)
- F. Employers shall be required to monitor worker exposure during abatement activities as required by The Department of Labor and The Occupational Safety and Health Administration (OSHA) regulation “Lead in Construction Final Rule and Notice” CFR 1926.62

- G. The minimum respiratory protection required for work shall be the half-face negative pressure respirator equipped with High Efficiency Particulate Air Filters (HEPA) capable of filtering 99.97 percent of mono-dispersed particles of .3 microns in diameter or greater. Additional respiratory protection shall be used if determined by personnel air monitoring data.
 - H. Workers shall be required to wear disposable Tyvek suits equipped with hoods and booties. No street clothes shall be permitted to be worn under Tyvek suits during abatement activities.
- E. Lead Abatement Contractor
- 1. If a Lead Abatement Contractor is utilized they shall be licensed in the State of Connecticut to perform lead abatement activities.
 - 2. If a Lead Abatement Contractor is utilized they shall possess insurance for lead paint abatement operations including pollution liability insurance.

9 Clean Up Procedures (Work Involving Abatement and to Eliminate Dust Hazards Identified at the Site)

- I. General Cleaning Procedures
- 1. Debris - removed debris shall be wrapped in polyethylene sheeting for transport out of the abatement or interim control area.
 - 2. Sheeting – Interior polyethylene sheeting shall be cleaned by HEPA vacuuming followed by wet misting. The polyethylene sheeting shall then be folded over upon itself to trap any remaining debris. Exterior polyethylene sheeting shall be wet misted and then folded over upon itself to trap any remaining debris.
 - 3. Preliminary clean-up - After interior polyethylene sheeting has been removed, the vertical and horizontal surfaces in the work area shall be HEPA vacuumed and washed with a solution of Tri-Sodium phosphate (TSP).
 - 4. The exterior surfaces shall be visually inspected by the Certified Renovator and any paint chips and other debris picked up and properly disposed.
 - 5. Final cleaning (Interior abatement only) - Final cleaning shall be conducted no earlier than 1 hour after completion of active abatement. The abatement areas including all horizontal surfaces and floors shall be HEPA vacuumed, washed with TSP, and HEPA vacuumed again.
- 9.

10 Re-occupancy

- A. Visual Inspection - After final cleaning, a licensed Lead Inspector or Lead Risk Assessor shall perform a visual inspection to identify any remaining dust.
- B. Clearance Sampling - Upon acceptance of the abatement area, wipe sampling shall be conducted on the floors, window sills or window troughs in locations where abatement took place within the dwelling unit.
- C. Clearance Wipe Sampling Criteria - The following dust wipe criteria shall be met prior to re-occupancy:
 - 1. floors – 10 ug/ft²
 - 2. window sills - 100 ug/ft²
 - 3. window wells - 400 ug/ft²
- D. Lead waste will be generated by the abatement activities as well as possibly by the renovation. To the extent that this lead contaminated waste is stored at the site as discussed in Item 11 below, and such storage in appropriate waste containers is on the ground, bare soil samples, subsequent to the removal of the waste, will be collected by a lead inspector for laboratory analysis and compared to the Connecticut standard of 400 mg/kg (ppm). If the result exceeds the standard, appropriate remediation of the soil must take place.

11 Waste Disposal

- A. Lead construction waste shall be properly disposed of. Disposal of lead waste shall be accordance with all local, state, and federal regulations. Resulting waste must be tested to determine disposal requirements and properly disposed **unless the building owner agrees to take possession in writing of up to 10 cubic yards of waste and dispose of it as ordinary household waste under the Connecticut household hazardous waste exemption.** Any waste in excess of 10 cubic yards must be characterized or assumed to be hazardous waste and disposed of properly.

Waste characterization shall be determined by the Toxic Characteristic Leachate Procedure (TCLP).before the interim control work starts. The collection of the TCLP sample will be performed by a certified lead inspector with the assistance of the contractor.

- 1. Hazardous Waste is characterized as greater than 5mg/L of leachable lead by the TCLP analyses.
- 2. Non-hazardous Solid Waste is characterized as 0-5mg/L by the TCLP Analysis

According to CTDPH, waste characterization is the responsibility of the Lead Consulting Contractor who can be assisted by the Lead Abatement Contractor in identifying the proper proportions of building components and substrates that comprise the waste stream. Under the direction of the lead consultant, the contractor can use various tools to create subsamples which will make up the ultimate sample which will be sent to a laboratory for TCLP analysis.

Owner _____

Signature_____

Date_____

LEAD-BASED PAINT ABATEMENT

39 WARHAM ST., WINDSOR, CT

SCOPE OF WORK

GENERAL NOTES:

1. The property is a single family, two story wood frame house with an unfinished basement constructed circa 1910. Windows are vinyl replacement with the exception of the ones in the basement. The exterior of the house has clapboard siding. There is a detached garage.
2. The workers must be properly trained and certified to perform the lead abatement work. A licensed lead abatement contractor must be utilized in performing the required work.
3. All required lead paint abatement work shall be conducted in compliance with HUD regulation 24 CFR Part 35.and Connecticut Regulation 19a-111 through 19a-111-11
4. Abatement work involving removal of doors and related components (casings, jambs, kickboards and thresholds) and windows (sashes, trim, sills, etc.) must be performed in strict coordination with general trades work. Resulting waste must be tested to determine disposal requirements and properly disposed.
5. All defective lead based painted surfaces shall be abated per this plan. Any remaining lead-based paint in an intact condition, including that which has been encapsulated or enclosed per this abatement plan, is to be included in an in-place management plan and periodically inspected for defective paint.
6. Hazardous levels of lead dust were found in the property during the lead inspection/risk assessment. These areas should be cleaned following the cleaning requirements of Section 9 of this plan.

7. During the LIRA (Lead Inspection and Risk Assessment), which took place on November 8, 2021, hazardous levels of lead in bare soil were found on the property. Samples were collected from the A and D side driplines of the house and from the C midyard. The sample on A side was well below the CTDPH standard of 400 mg/kg of lead in soil and does not contain a lead hazard. However, hazardous levels of lead were found in the C midyard (1400 mg/kg) and the D dripline (5,000 mg/kg). The C midyard can be remediated with an **interim control method** but the D dripline will require **abatement** as a level of 5,000 mg/kg of lead mandates abatement of the soil.

Since there will be lead abatement work taking place on the A, B and C exterior sides of the house and in addition, subsequent to the LIRA, a weatherization contractor, has removed all the windows, which were coated with lead based paint, and installed new vinyl window systems, it was decided to establish baseline levels of lead in soil in the driplines of these sides of the house BEFORE abatement work commenced.

In addition, since there will be lead abatement work taking place on the C side of the garage, which has soil in the dripline (Note: the A and D side driplines are covered with asphalt and soil on the B side is on the neighbor's property), it was decided to collect a baseline sample in that location as well. Any levels in excess of the CTDPH standard of 400 mg/kg will be included in the final abatement plan with the appropriate method of remediation.

8. Baseline soil samples were collected in the aforementioned locations on January 4, 2023. The result in the **A dripline** was 2500 mg/kg. To put this into perspective, when the soil in the dripline on that side of the house was sampled during the LIRA, the level of lead was only 140 mg/kg, well below the CTDPH threshold of 400 mg/kg. A result below 400 mg/kg is considered to be non-lead hazardous. The question is why did the baseline sample have such a high lead result? One possibility is that the weatherization contractor did not use the requisite lead safe work practices, following the EPA RRP Rule's containment requirements, and the soil was contaminated during the removal of the windows.

The result in the **B dripline** was 1500 mg/kg and, therefore, the soil in that area is also a lead hazard. This area was not sampled in the LIRA.

The result in the **C dripline** was 2400 mg/kg and, therefore, the soil in that area is also a lead hazard. This area was not sampled in the LIRA.

The baseline sample collected from the C side of the garage had a result of 310 mg/kg and, therefore, the soil in that location **was not** found to be a lead hazard.

9. These baseline results on the A, B and C sides of the house require that the abatement plan include soil remediation on those sides. An interim control method can be used as the results are below 5,000 mg/kg. On the C side of the garage, upon the conclusion of exterior abatement, to confirm that the contractor utilized methods to protect the soil in that location, a confirmatory soil sample will be collected to determine if the lead in soil levels have remained below 400 mg/kg.

LOCATION	COMPONENT	CONDITION	REMEDATION METHOD
INTERIOR			
FIRST FLOOR			
R3-Pantry	Baseboards	Defective	Provide removal of any areas of loose flaking paint and prepare surfaces for liquid encapsulation, Provide interior liquid encapsulant approved for use in the State of Connecticut. Color of encapsulant to be approved by the homeowner
R3-Pantry	A-D Walls	Defective	Provide removal of any areas of loose flaking paint and prepare surfaces for liquid encapsulation, Provide interior liquid encapsulant approved for use in the State of Connecticut. Color of encapsulant to be approved by the homeowner
R3-Pantry	B Window Trim and Sill	Defective	Provide removal of any areas of loose flaking paint and prepare surfaces for liquid encapsulation, Provide interior liquid encapsulant approved for use in the State of Connecticut. Color of encapsulant to be approved by the homeowner
R3-Pantry	D Side Casing (in Cased Opening)	Defective	Provide removal of any areas of loose flaking paint and prepare surfaces for liquid encapsulation, Provide interior liquid encapsulant approved for use in the State of Connecticut. Color of encapsulant to be approved by the homeowner
SECOND FLOOR			
R-7-Office	B and C Walls (Wainscoting)	Defective	Provide removal of any areas of loose flaking paint and prepare surfaces for liquid encapsulation, Provide interior liquid encapsulant approved for use in the State of Connecticut. Color of encapsulant to be approved by the homeowner

LOCATION	COMPONENT	CONDITION	REMEDIATION METHOD
INTERIOR			
SECOND FLOOR			
R-7-Office	Ceiling (Wainscoting)	Defective	<p>Provide removal of any areas of loose flaking paint and prepare surfaces for liquid encapsulation,</p> <p>Provide interior liquid encapsulant approved for use in the State of Connecticut. Color of encapsulant to be approved by the homeowner</p>
R-7-Office	B Door (to Closet)	Defective	<p>Option 1:</p> <p>Scrape door edges to bare substrate using wet methods.</p> <p>Provide removal of any areas of loose flaking paint on the remainder of the door which is not a friction or impact surface and prepare surfaces for liquid encapsulation.</p> <p>Provide interior liquid encapsulant approved for use in the State of Connecticut. Color of encapsulant to be approved by the homeowner</p> <p>Option 2:</p> <p>Door to be removed and replaced with new door in accordance with the rehabilitation specifications of the Windsor Housing Rehabilitation Loan Program.</p> <p>Dispose of the door as presumed hazardous waste unless a TCLP test characterizes the total amount of waste generated in the project as non-hazardous or the homeowner is willing to take possession of debris in writing if the total amount of waste falls within the State of Connecticut 10 cubic yard homeowner exemption.</p>

LOCATION	COMPONENT	CONDITION	REMEDIATION METHOD
INTERIOR			
SECOND FLOOR			
R-7 Office	Window Sills (rear half covered and not lead hazard but the front portion exposed and significantly damaged and a lead hazard)	Defective	Provide removal of any areas of loose flaking paint and prepare surfaces for liquid encapsulation, Provide interior liquid encapsulant approved for use in the State of Connecticut. Color of encapsulant to be approved by the homeowner
EXTERIOR-HOUSE			
Side A	Clapboard Siding	Defective	Provide removal of any areas of loose flaking paint and prepare surfaces for liquid encapsulation, Provide exterior liquid encapsulant approved for use in the State of Connecticut. Color of encapsulant to be approved by the homeowner
Side A	Upper Trim	Defective	Provide removal of any areas of loose flaking paint and prepare surfaces for liquid encapsulation, Provide exterior liquid encapsulant approved for use in the State of Connecticut. Color of encapsulant to be approved by the homeowner
Side A	A Door Casing (Entry Door)	Defective	Provide removal of any areas of loose flaking paint and prepare surfaces for liquid encapsulation, Provide exterior liquid encapsulant approved for use in the State of Connecticut. Color of encapsulant to be approved by the homeowner
Side A	Railing Cap and Balusters	Defective	Provide removal of any areas of loose flaking paint and prepare surfaces for liquid encapsulation, Provide exterior liquid encapsulant approved for use in the State of Connecticut. Color of encapsulant to be approved by the homeowner

LOCATION	COMPONENT	CONDITION	REMEDIATION METHOD
EXTERIOR- HOUSE			
Side A	Porch Ceiling, Ceiling Joist and Lower Trim	Defective	Provide removal of any areas of loose flaking paint and prepare surfaces for liquid encapsulation, Provide exterior liquid encapsulant approved for use in the State of Connecticut. Color of encapsulant to be approved by the homeowner
Side A	Horizontal Trim Boards (white paint: below porch floor level and both over and under green lattice)	Defective	Provide removal of any areas of loose flaking paint and prepare surfaces for liquid encapsulation, Provide exterior liquid encapsulant approved for use in the State of Connecticut. Color of encapsulant to be approved by the homeowner
Side B	Clapboard Siding	Defective	Provide removal of any areas of loose flaking paint and prepare surfaces for liquid encapsulation, Provide exterior liquid encapsulant approved for use in the State of Connecticut. Color of encapsulant to be approved by the homeowner
Side B	Basement Window Sashes and Frames	Yes	Window sash system (sash, parting beads, blind stops) to be removed to rough opening and replaced with new vinyl replacement window unit. Style of unit to be selected by the homeowner Dispose of the window systems as presumed hazardous waste unless a TCLP test characterizes the total amount of waste generated in the project as non-hazardous or the homeowner is willing to take possession of debris in writing if the total amount of waste falls within the State of Connecticut 10 cubic yard homeowner exemption

LOCATION	COMPONENT	CONDITION	REMEDIATION METHOD
EXTERIOR- HOUSE			
Side B	Horizontal Trim Boards (white paint: below porch floor level and both over and under green lattice)	Defective	Provide removal of any areas of loose flaking paint and prepare surfaces for liquid encapsulation, Provide exterior liquid encapsulant approved for use in the State of Connecticut. Color of encapsulant to be approved by the homeowner
Side D	Basement Window Sashes and Frames	Yes	Window sash system (sash, parting beads, blind stops) to be removed to rough opening and replaced with new vinyl replacement window unit. Style of unit to be selected by the homeowner Dispose of the window systems as presumed hazardous waste unless a TCLP test characterizes the total amount of waste generated in the project as non-hazardous or the homeowner is willing to take possession of debris in writing if the total amount of waste falls within the State of Connecticut 10 cubic yard homeowner exemption
Side D	Horizontal Trim Boards (white paint: below porch floor level and both over and under green lattice)	Defective	Provide removal of any areas of loose flaking paint and prepare surfaces for liquid encapsulation, Provide exterior liquid encapsulant approved for use in the State of Connecticut. Color of encapsulant to be approved by the homeowner
EXTERIOR- DETACHED GARAGE			
Sides A-D	Upper Trim	Defective	Provide removal of any areas of loose flaking paint and prepare surfaces for liquid encapsulation, Provide exterior liquid encapsulant approved for use in the State of Connecticut. Color of encapsulant to be approved by the homeowner

LOCATION	COMPONENT	CONDITION	REMEDIATION METHOD
EXTERIOR- DETACHED GARAGE			
Side A	Overhead Door Jambs	Defective	Scrape jambs to bare substrate using wet methods and apply paint to the bare surface. Color of paint to be approved by homeowner.
Side A	Overhead Door Casings	Defective	Provide removal of any areas of loose flaking paint and prepare surfaces for liquid encapsulation, Provide exterior liquid encapsulant approved for use in the State of Connecticut. Color of encapsulant to be approved by the homeowner
Side D	Door, Casing and Jamb	Defective	<p>Option 1: Scrape door edges and jambs to bare substrate using wet methods.</p> <p>Provide removal of any areas of loose flaking paint on the remainder of the door which is not a friction or impact surface and the door casing and prepare surfaces for liquid encapsulation.</p> <p>Provide exterior liquid encapsulant approved for use in the State of Connecticut. Color of encapsulant to be approved by the homeowner</p> <p>Option 2: Door system (door, casing and jambs) to be removed and replaced with new door system in accordance with the rehabilitation specifications of the Windsor Housing Rehabilitation Loan Program.</p> <p>Dispose of the door components as presumed hazardous waste unless a TCLP test characterizes the total amount of waste generated in the project as non-hazardous or the homeowner is willing to take possession of debris in writing if the total amount of waste falls within the State of Connecticut 10 cubic yard homeowner exemption.</p>

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LOCATION	SUBSTANCE	CONDITION	REMEDIATION METHOD
C Midyard	Soil	Hazardous Level of Lead: 1400 mg/kg	<p><i>Interim Control</i></p> <p>Option 1: Cover bare areas of soil with sod.</p> <p>Option 2: Plant grass seed in bare areas of soil.</p> <p>Note: Both of these options need to take place in the Spring, as performing them in the Winter is not a viable.</p>
D Dripline	Soil	Hazardous Levels of Lead: 5000 mg/kg	<p><i>Abatement</i></p> <p>Excavate all the soil from the foundation out to three feet. The depth of the excavation has to be at least six inches and all the soil removed. The resulting cavity needs to be filled with non-lead contaminated soil. The lead level in the replacement soil must be less than 200 mg/kg. During the clearance inspection, the lead inspector will be sampling the replacement soil to confirm that the lead level meets this requirement.</p>
A, B, and C Driplines	Soil	Hazardous levels Lead below 5,000 mg/kg.	<p><i>Interim Control:</i></p> <p>Remove the top two inches of soil in the dripline and lay down landscape fabric. Cover the fabric with 3 inches of pine bark mulch.</p>

HOUSE FLOOR DIAGRAMS

Project Name: Windsor Johnson L200

Address: 39 Wackerly St Windsor CT

Floor: _____ Room: _____

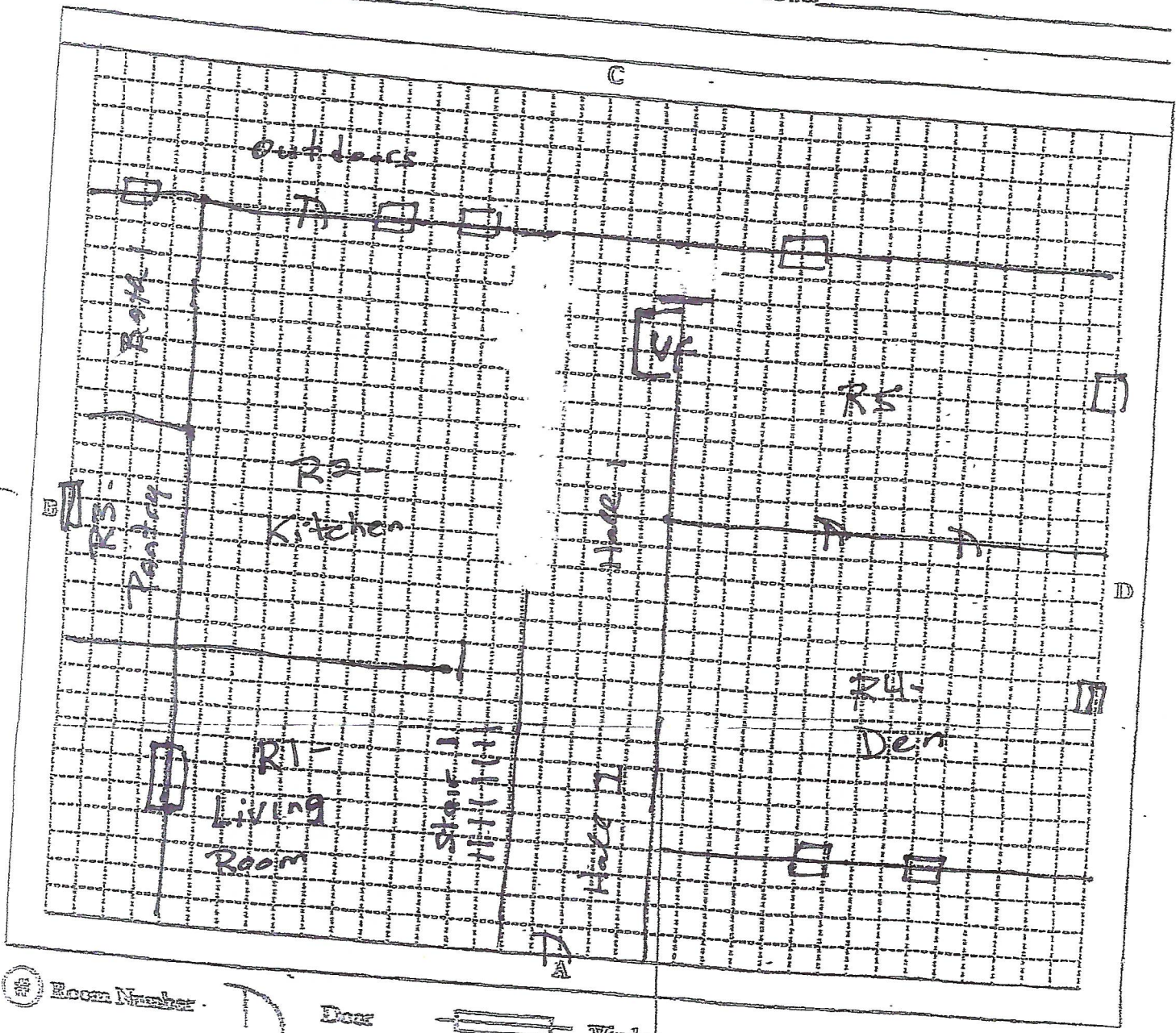
Number of Doors: _____

Diagram of Floor 1 No. of Windows: _____

Project Number: 2019-152

Apt. #/Bldg #: _____

Page _____ of _____



Room Number

Door

Window

Page _____ of _____

Project Name: Windsor Johnson Home

Address: 39 Wagon St Windsor CT

Floor: _____ Room: _____

Number of Doors: _____

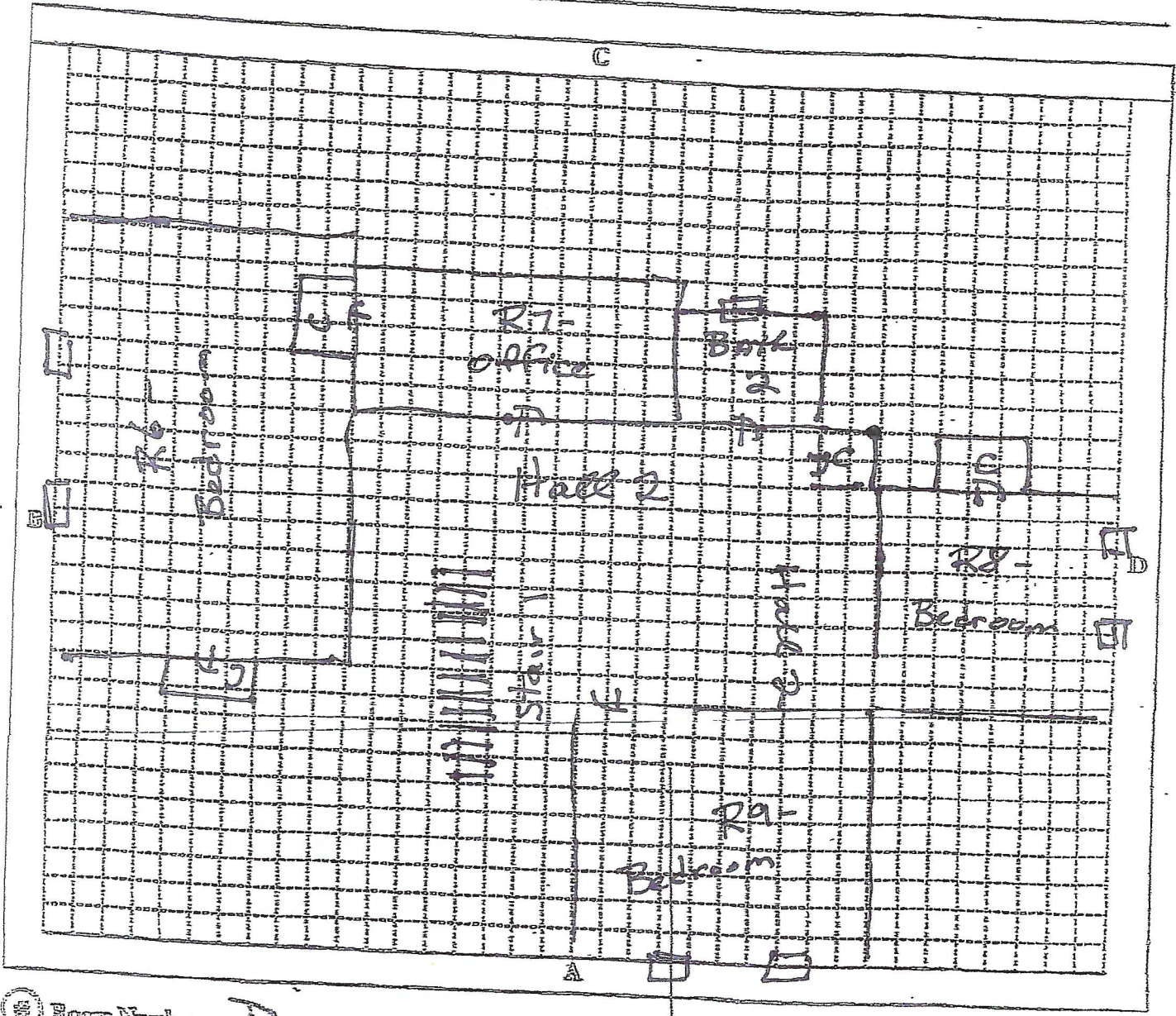
Diagram of: Floor 2

Project Number: 2019-152-1

Apt. #/Blk #: _____

Page _____ of _____

No. of Windows: _____



Room Number

Door



Window

Page _____ of _____

BASELINE SOIL TEST RESULTS



EMSL Analytical, Inc.

200 Route 130 North, Cinnaminson, NJ 08077

Phone/Fax: (856) 303-2500 / (856) 786-5974

<http://www.EMSL.com>

cinnaminsonleadlab@emsl.com

EMSL Order: 202300135

CustomerID: ENVP25

CustomerPO:

ProjectID:

Attn: **Neal Freuden**
EnviroPlan, LLC
27 Trotwood Drive
West Hartford, CT 06117

Phone: (860) 977-5171
Fax:
Received: 1/6/2023 11:00 AM
Collected: 1/4/2023

Project: **Windsor Johnson LIRA 2019-152-11 39 Warham, Windsor, CT**

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

<i>Client Sample Description</i>	<i>Lab ID</i>	<i>Collected</i>	<i>Analyzed</i>	<i>Weight</i>	<i>Lead Concentration</i>
01-04-23-NBF-01 Site: A Dripline - house	202300135-0001	1/4/2023	1/9/2023	0.5138 g	2500 mg/Kg
01-04-23-NBF-02 Site: B Dripline - house	202300135-0002	1/4/2023	1/9/2023	0.5419 g	1500 mg/Kg
01-04-23-NBF-03 Site: C Dripline - house	202300135-0003	1/4/2023	1/9/2023	0.5834 g	2400 mg/Kg
01-04-23-NBF-04 Site: C Dripline - garage	202300135-0004	1/4/2023	1/9/2023	0.5086 g	310 mg/Kg

Owen Mckenna, Lead Laboratory Director
or other approved signatory

EMSL maintains liability limited to cost of analysis. Interpretation and use of test results are the responsibility of the client. 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 or analytical method limitations. The report reflects the samples as received. Results are generated from the field sampling data (sampling volumes and areas, locations, etc.) provided by the client on the Chain of Custody. Samples are within quality control criteria and met method specifications unless otherwise noted.

* Analysis following Lead in Soil/Solids by EMSL SOP/Determination of Environmental Lead by FLAA. Reporting limit is 40 mg/kg based on the minimum sample weight per our SOP. Unless noted, results in this report are not blank corrected. "<" (less than) result signifies that the analyte was not detected at or above the reporting limit. Measurement of uncertainty is available upon request. Definitions of

Samples analyzed by EMSL Analytical, Inc. Cinnaminson, NJ Method SW 846 7000B replaces EPA 7420 for lead analysis and is an equivalent method. NELAP Certifications: NJ 03036, NY 10872, PA 68-00367, CA 1877, AIHA LAP, LLC-ELLAP Accredited #100194, A2LA Accredited - Certificate #2845.01

Initial report from 01/10/2023 16:21:12

EnviroPlan LLC
27 Trotwood Dr.
West Hartford, CT 06117

202300135

SAMPLE LOG FOR LEAD SOIL

Sheet No. 1 of 1

Project Name: Windsor Johnson LIRA
Building: 39 Worker, Windsor, CT

Project Number: 2019-152-11

Sample ID Number	Sample Location/Building	Soil Condition	Result (%)	Lab Number
01-04-23- NCF-01	A Dr. pline - House			
01-04-23- NCF-02	B Dr. pline - House			
01-04-23- NCF-03	C Dr. pline - House			
01-04-23- NCF-04	C Dr. pline - Garage			

Analysis Method: EPA-SW-846-3050-7420

Turnaround Time 1 week

Date: _____ Time: _____
Date: _____ Time: _____

Based on the turnaround time indicated above, analyses are due to EnviroPlan on or before this date: _____
Please e-mail results to freuden@comcast.net. Please call 860-977-5171 if analyses will be late.

485

Special Instructions: _____

Samples Collected By: D. Freuden Date: 1/04/23 Time: _____

Samples Rec'd/Sent By: D. Freuden Date: 1/05/23 Time: _____

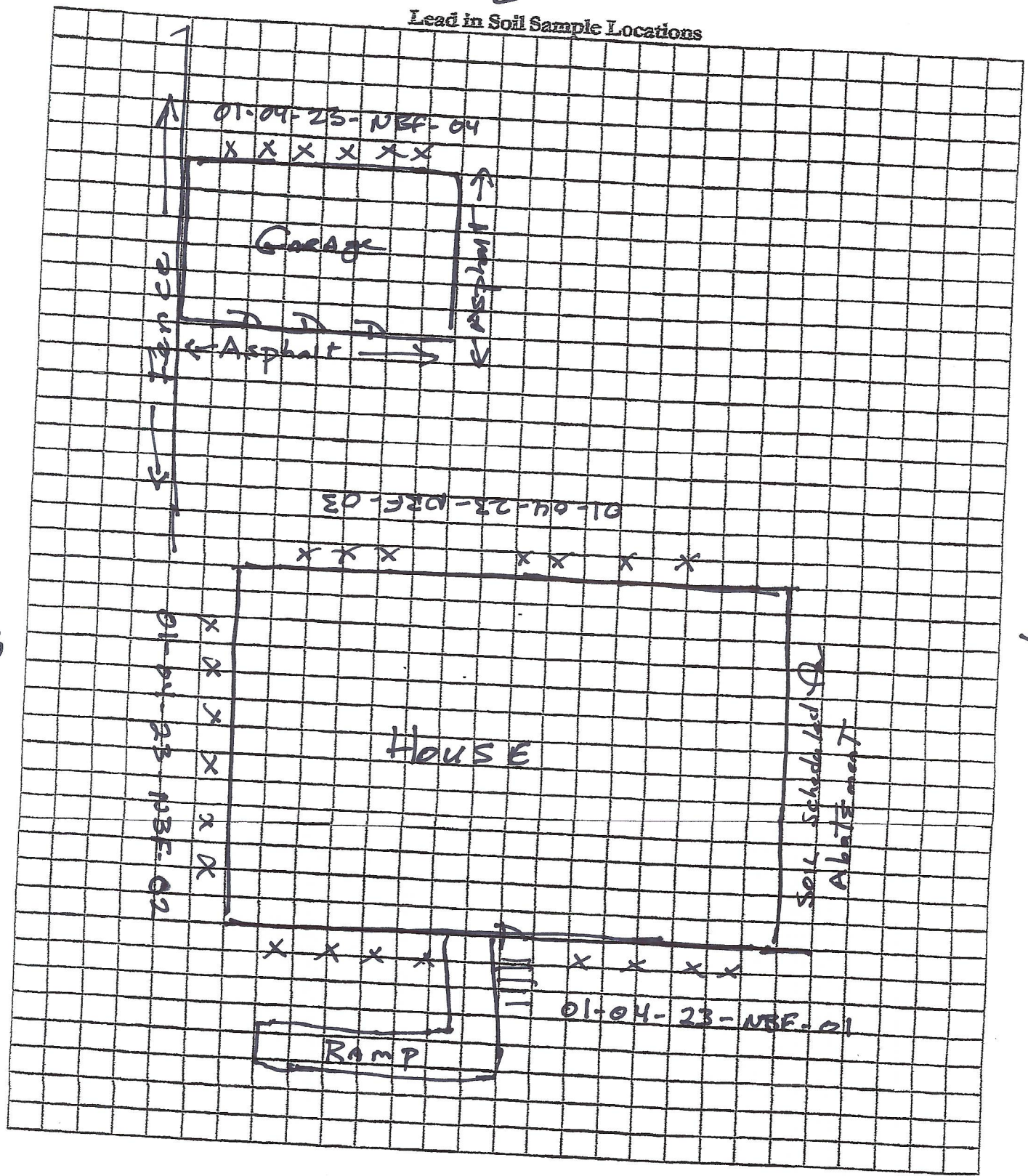
Samples Received By: Brandon Torres Date: 1/6/23 Time: 11AM

Shipped To: EMSL (State) NJ Other _____

Method of Shipment: Fed Ex UPS Overnight UPS Ground Other _____

(SEE REVERSE FOR DIAGRAM)

C
Lead in Soil Sample Locations



A
39 Warham street
Windsor, Connecticut