

# **SUMMARY OF PAINT AND PLASTER STABILIZATION ACTIVITIES**

**at the**

## **MARY MCLEOD BETHUNE SCHOOL**

**3301 OLD YORK ROAD.,  
PHILADELPHIA, PA 19140**

Prepared For:

Stephen Link  
Environmental Services Director

School District of Philadelphia  
Office of Environmental Management & Services  
440 N. Broad Street, 3<sup>rd</sup> Floor – Portal C  
Philadelphia, PA 19130

Prepared by:



BATTA Environmental Associates, Inc.  
6 Garfield Way  
Newark, DE. 19713

September 15, 2021

BEA #543521AF  
Work Order #1897135

Prepared by: \_\_\_\_\_

Alyssa M. Cartagena | Project Manager

A handwritten signature in black ink, appearing to read "Alyssa M. Cartagena", is written over a horizontal line.



## Table of Contents

<b>Section</b>	<b>Page</b>
Part 1 - Introduction.....	2
Part 2 - Methods and Executive Summary .....	2
A. Paint and Plaster Stabilization Procedures .....	2
1. Work Practices.....	2-3
2. Oversight .....	3
B. Clean up and Completion.....	3
1. Clean up .....	3-4
2. Testing.....	4-6
Part 3 – Oversight .....	7
A. Scope of Work .....	7
B. EPA Checklist .....	7
C. Oversight .....	7-8
D. Sample Results .....	8
APPENDIX A	Scope of Work Table
APPENDIX B	EPA Checklist Table
APPENDIX C	Oversight Table
APPENDIX D	Sample Results Table
APPENDIX E	Environmental Consultant Certifications
APPENDIX F	Paint Contractor Certifications or Training Documents

## **SUMMARY OF PAINT AND PLASTER LEAD STABILIZATION ACTIVITIES**

### **Part 1 – Introduction**

BATTA Environmental Associates, Inc. was requested by the School District of Philadelphia's (SDP) Office of Environmental Management Services (OEMS) to perform oversight and clearance testing during a paint and plaster stabilization project being performed by the School District Painters at the Mary McLeod Bethune School located at 3301 Old York Road., in Philadelphia, PA.

The purpose of the oversight was to document that all requirements of the US Environmental Protection Agency (EPA) Lead Renovation, Repair and Painting (RRP) rules were being followed and documented.

### **Part 2 – Methods Executive Summary**

- A. Paint and Plaster Stabilization Procedures - The paint and plaster stabilization work complied with the EPA's Lead RRP rule. All staff conducting this work were trained and/or certified as Lead RRP workers. The following procedures were followed:
1. Work Practices
    - a. Isolate work areas to restrict dust from impacting adjacent areas.
    - b. Post signs/notifications as per EPA Lead RRP.
    - c. Place "walk-off" pads at all access points into/out of work areas.
    - d. Seal all openings (windows, doors, and HVAC system registers/grilles) inside work areas as per direction from on-site environmental consultants and consistent with the EPA Lead RRP rules and guidelines.
    - e. Workers were to wear disposable clothing and foot coverings while inside work areas and were not permitted to leave the work areas wearing disposable clothing.
    - f. Move/Cover all remaining objects in the work area to protect them (including all open bins, shelves and boxes in the area).
    - g. Employ/Erect "portable" dust containment barrier systems to limit the size of work areas requiring post-cleaning and limit testing and exposure.
    - h. Place plastic floor coverings extending at least six (6) feet out from vertical surfaces being stabilized, unless utilizing vertical barriers/containment systems.
    - i. Perform all paint stabilization work in compliance with the EPA Lead RRP rules and guidelines and as per the directions of on-

- site environmental consultants to minimize dust contamination.
- j. Take all steps necessary to ensure that no dust or debris leaves the work area while the work is being performed.
  - k. Use precautions to ensure that all employees, tools, and other items, including the exteriors of waste containers, are free of dust and debris before leaving the work area.
  - l. Collect all paint chips and debris, fold up plastic floor coverings and any other plastic sheeting used on horizontal surfaces without dispersing dust or debris and dispose of the material in heavy duty plastic waste bags.
  - m. Do not use power tools
  - n. Do not use dry sweeping with brooms.
  - o. Do use water/misting during stabilization to minimize dust.
  - p. Do use HEPA vacuums and wet wiping/cleaning techniques.
2. Oversight - An environmental consultant was on-site to oversee the paint and plaster stabilization work and to ensure compliance with lead safe work practices. An oversight report was completed at the end of every shift to record the work areas that were stabilized. The following tasks were verified and recorded:
- a. Work area prepped.
  - b. Surfaces stabilized.
  - c. Final inspection approval.
- B. Clean-Up and Completion - The following clean-up and completion procedures performed for each work area following completion of the stabilization work:
- 1. Clean-up
    - a. There should be no signs of loose, peeling, flaking, bubbling or crumbling paint or plaster visible on walls or ceilings or on any other painted surfaces.
    - b. There should be no visible signs of paint chips, debris, or dust of any kind, on surfaces within "contained" and isolated work areas NOR outside of the contained and isolated work areas.
    - c. Window sills, floors, baseboards, shelving units, tops of cabinets, desks, chairs, tables and all other horizontal must be free of any visible signs of paint and plaster dust and/or debris.
    - d. There must be absolutely no visible signs of paint chips, and/or paint/plaster dust or debris on academic/educational materials, including books, bins, toys, desks, chairs, carpets,

- papers, etc., after each work shift and to allow for re-occupancy the next day.
- e. Any remaining paint and plaster must be tightly adhered to wall and ceiling surfaces such that it cannot be further damaged, pried off or disturbed by “simple fingernail pressure” otherwise work will not be considered to be successfully completed.
  - f. Newly painted surfaces should match the aesthetics of the area in total and should cover the entirety of the wall or ceiling area that was addressed through this work. No visible “patches” of paint should be observed.
2. Testing - The SDP and the Philadelphia Federation of Teacher’s (PFT’s) Environmental Consultant worked closely to develop an agreed upon approach to verify that stabilization work was performed in accordance with lead safe work practices, and that classrooms would be safe for re-occupancy by children and staff. This approach exceeded the EPA Lead RRP rule requirements in terms of the types of, and amounts of, testing performed and the testing was conducted in the work areas. The areas were cleaned by general cleaners after the stabilization work was completed and the clearance testing was performed. Qualitative testing methods (i.e., EPA RRP verification wipe testing and colorimetric wipe testing) were compared with the quantitative testing method of Flame Atomic Absorption Spectrophotometry (FAAS) as indicated in the testing protocol.
3. Testing Protocol
- a. Step 1 – EPA RRP Verification Wipes and Colorimetric Wipes.
    - i. The environmental consultant and painter foreman coordinated the EPA RRP Verification Test Wipe in rooms/areas that were stabilized and cleaned, and where plastic work area coverings were removed and visual inspection conducted. After EPA RRP verification wipes passed the cleanliness standard for any surface and/or a 40 square foot (SF) section, the colorimetric testing was conducted by the environmental consultant.
    - ii. The colorimetric wipe tests occurred in “child-occupied areas” on approximately 10% of surfaces considered “clean” following the use of the verification wipes. These surfaces generally included floors, window sills, or the tops of any other immovable objects that were covered and cleaned in each work area (e.g. CUVs, immovable bookshelves, large

desks, etc...). In some instances, additional colorimetric wipes were collected on surfaces that had been moved and covered and placed outside of the work area. These surfaces generally included desks, chairs, bookshelves, cabinets, etc.

- iii. "Child-occupied areas" included: classrooms, restrooms, cafeterias, libraries, gymnasiums, and auditoriums that are routinely used by children in Pre-Kindergarten through First Grade. Common areas that children in Pre-Kindergarten through First Grade only pass through, such as hallways, stairways, and garages were not included. "Child-occupied areas" were identified by the Principal of the school.
- b. Step 2 – Response to Failed Tests
  - i. If the colorimetric testing "failed", then the 40 SF area was re-wiped by EPA RRP Wipes. The process continued until both testing methods confirmed a "pass".
- c. Step 3 – Flame Atomic Absorption Spectrophotometry (FAAS)
  - i. Flame Atomic Absorption Spectrophotometry (FAAS) was used to verify and confirm the results of the colorimetric testing. FAAS was used as a quality assurance/quality control measure for the colorimetric samples. Approximately 10% (or at least one) of the colorimetric samples were submitted for FAAS analysis.
- d. Step 4 – Release Spaces Back to School/Operations
  - i. When EPA RRP wipes, colorimetric wipes, and FAAS analyses were all acceptable, and if work was completed in accordance with this procedure, the room was turned over to the District's Operations team for "deep cleaning" and for re-occupancy.
- e. Step 5 – Ongoing Review
  - i. All sampling and testing data, information, and results are readily available and accessible for review by school staff, parents and members of the Oversight Advisory

Committee and can be reviewed on a regular basis. Any suggested modifications, changes or other revisions will be considered by the School District of Philadelphia.

The three testing methods conducted were as follows:

Type of Clearance Tests	Building Component	Number of Sample Locations within Work Area	Type of Testing	Testing Specifications/Limitations
EPA RRP Cleaning Verification Wipe	Floors, Countertops, Desks, Tables, Window Sills.	One (1) wipe every 40 square feet (ft <sup>2</sup> ) or entire surface of component if surface area is less than 40 ft <sup>2</sup> . One (1) wipe for every window sill.	Qualitative	<ul style="list-style-type: none"> <li>Qualitative testing based on cleanliness (white glove test).</li> <li>According to RRP, the areas pass after the third cleaning, regardless of verification.</li> </ul>
Colorimetric Wipe: SKC, Inc. Full Disclosure® Instant Wipes	Floors, Countertops, Desks, Tables, Window Sills, Etc.	10% of surfaces considered "clean" following the use of EPA RRP Cleaning Verification Wipes.	Qualitative	<ul style="list-style-type: none"> <li>Qualitative testing based on colorimetric visual comparison.</li> <li>Lower Limit of Visual Detection is 18 micrograms per ft<sup>2</sup> (µg/ft<sup>2</sup>) of lead.</li> <li>False positive and false negative interferences from silver, cadmium, barium, mercury, and titanium (percentages unknown).</li> <li>Involves field preparation of sampling media using reagents.</li> </ul>
Flame Atomic Absorption Spectrophotometry (FAAS)	Analyze Colorimetric Wipes from locations listed above.	A minimum of one and a maximum of 10% of colorimetric wipes were subjected to laboratory analysis by FAAS for verification. This testing method was used to validate the accuracy of qualitative methods mentioned above.	Quantitative	<ul style="list-style-type: none"> <li>Interior Floors and Desks: &lt; 10 µg/ft<sup>2</sup></li> <li>Window Sills: &lt; 100 µg/ft<sup>2</sup></li> </ul>



**Part 3 – Oversight****A. Scope of Work**

1. A scope of work was developed for the Mary McLeod Bethune School following a previous room-by-room inspection of the school. During the inspection, the location and quantity of damaged paint and plaster, along with any associated debris and whether the damage was the result of an on-going moisture intrusion problem, were noted. This information was entered into a scope of work spreadsheet, which was provided to the SDP's painting contractors in order to create a schedule for the work to be completed.
2. The Scope of Work Table for the Mary McLeod Bethune School can be found in appendix A of this report.

**B. EPA Checklist**

1. Throughout the paint and plaster stabilization work, BATTA Environmental's on-site inspector observed, documented, and signed-off on tasks required by the EPA RRP. Additional notes were added to the EPA Checklist to document different oversight tasks that took place. These included documenting that warning signs were posted at the entrance to the work area, that the work area had been contained to prevent the spread of dust and debris, that all objects in the work area had been removed or covered, that all HVAC ducts in the work area were closed and covered, that windows in the work area were closed, that doors in the work area were closed and sealed, that doors that must be used in the work area were covered to allow passage but prevent the spread of dust, that floors in the work area were covered with taped-down plastic, that waste was being contained while on-site and while being transported, that the work site was properly cleaned after the renovations, that all paint chips and debris were picked up and that the protective sheeting was misted, folded dirty-side inward, and taped for removal. Also, that the work area surfaces and objects were cleaned using HEPA vacuums and/or wet-wiping, that a certified renovator performed the post-renovation cleaning verification, a description of the post-renovation cleaning verification was documented, including the number of wet and dry cloths used, and if the dust clearance testing was performed.
2. The EPA Checklist Table for the Mary McLeod Bethune School is included in Appendix B of this report.

**C. Oversight**

1. Throughout the paint and plaster stabilization project, BATTA Environmental's on-site inspector documented the day-to-day tasks performed for each work area. These tasks included the dates work area preparation, the stabilization of the painted surfaces, and the final inspection.





2. The Oversight Table for the Mary McLeod Bethune School is included in Appendix C of this report.

**D. Sample Results**

1. Throughout the paint and plaster stabilization project, BATTa Environmental's on-site inspector documented all sampling results for each work area location. This included all RRP verification wipes, colorimetric wipes, and wipes that were submitted to a certified laboratory for FAAS analysis.
2. The Sample Results Table for the Mary McLeod Bethune School is included in Appendix D of this report.
3. Refer to Appendix E for Environmental Consultant Certifications, and Appendix F for Paint Contractor Certifications or Documentation of Training (certifications of the individuals performing the RRP work/training were provided to the SDP prior to the work).

**BATTa Environmental's work relative to this specific assignment has been completed. We appreciate the opportunity to have been of service to the School District. Please feel free to contact BATTa Environmental if you have any questions.**



## **APPENDIX A**

### **SCOPE OF WORK TABLE**

# Scope of Work Table - Mary McLeod Bethune School

8/3/2021

<div>Most Classrooms have five walls. Therefore, for practical purposes, walls 1 and 2 are considered as Wall 1, then 2, 3, 4. Most rooms have adhesive residue remaining on the walls that would need to be scraped off prior to painting. Also, the bottom course of brown ceramic block wall in most spaces has lead (1.4 mg/cm2).</div>						Blue highlighted row is where a previous asbestos paint sample was collected from.						School District of Philadelphia															
						Name of Inspector: Paul M. Davis						Lead Safe Certification Assessment Report										Inspection Dates : June 2021					
Inspection Company: VERTEX						Bethune ES School										ULCS# 7510											
ULCS#	E	Bldg/Unit	F	Space #	Space Type	On-Site Room Name	Students	Component	Substrate Material	Color	Description of Damage	Damage	XRF Reading	XRF	Debris Present	Quantity (sf)	Asbestos Paint	Contents Need to	On-going	Plastering	Asbestos	Comments/Description/Notes					
7510	1	B751001-1	1	120	M/C Library	M/C Library	Yes	W1	CMU	White	None	0	N/A	N/A	None	0	N/A	No	No	no	no	Wall 1's same side as M/C 120A Office and					
7510	1	B751001-1	1	120	M/C Library	M/C Library	Yes	Door Frame	Metal	Blue	Chipping	12	0.25	Negative	None	0	N/A	No	No	no	no	Across from Classroom 10B					
7510	1	B751001-1	1	120	M/C Library	M/C Library	Yes	Door Frame	Metal	Blue	Chipping	10	0.06	Negative	None	0	N/A	No	No	no	no	Across from Classroom 10B					
7510	1	B751001-1	1	120	M/C Library	M/C Library	Yes	W2	CMU	White	Chipping	1	0.03	Negative	None	0	N/A	No	No	no	no						
7510	1	B751001-1	1	120	M/C Library	M/C Library	Yes	Window Frame	Metal	Blue	Chipping	4	0.05	Negative	None	0	N/A	No	No	no	no	Windows to M/C Office					
7510	1	B751001-1	1	120	M/C Library	M/C Library	Yes	Door Frame	Metal	Blue	Chipping	10	0.04	Negative	None	0	N/A	No	No	no	no						
7510	1	B751001-1	1	120	M/C Library	M/C Library	Yes	W3	CMU	White	None	0	N/A	N/A	None	0	N/A	No	No	no	no	Includes two doors					
7510	1	B751001-1	1	120	M/C Library	M/C Library	Yes	Door	Metal	Blue	Scraped	3	0.9	Positive	None	0	N/A	No	No	no	no	Includes two doors					
7510	1	B751001-1	1	140	M/C Library	M/C Library	Yes	Door Frame	Wood	Blue	Fiberglass/Chipping	4	0.7	Positive	None	0	N/A	No	No	no	no						
7510	1	B751001-1	1	120	M/C Library	M/C Library	Yes	W4	Sheetrock	Blue	None	0	N/A	N/A	None	0	N/A	No	No	no	no						
7510	1	B751001-1	1	120	M/C Library	M/C Library	Yes	Columns	Concrete	Blue	None	0	N/A	N/A	None	0	Negative	No	No	no	no						
7510	1	B751001-1	1	120	M/C Library	M/C Library	Yes	Ceiling	N/A	N/A	N/A	N/A	N/A	N/A	None	0	N/A	No	No	no	no	2 x 4 Drop Ceiling					
7510	1	B751001-1	1	120	M/C Library	M/C Library	Yes	Floor	N/A	N/A	N/A	N/A	N/A	N/A	None	0	N/A	No	No	no	no	12 x 12 Floor Tiles					



## **APPENDIX B**

### **EPA CHECKLIST TABLE**

## EPA Checklist Table - Mary McLeod Bethune School

8/3/2021

[illegible]



## **APPENDIX C**

### **OVERSIGHT TABLE**

# Oversight Table - Mary McLeod Bethune School

8/3/2021

Task ID	ULCS#	E I 4 m s a r	F i l e s	On Site Room Name	Student/Teacher Occupied	Component	Description of Paint and Plaster Damage	XRF (positive/negative)	Pre-Cleaning Completed (date)	Contents Moved (date)	Work Area Prepped (date)	Surfaces Stabilized (date)	Contents Back in Place (date)	Final Inspection Approval and Photos (date)	Square Footage of Work Area	Number of Required RRP Wipes	Number of Colorimetric Wipes Used to Pass	Final Colorimetric Wipe Submitted for AAS Analysis (yes/no)	AAS Analysis Results	Comments from Assessment	Comments from Oversight
1	7510	1	1	MMC Library	Yes	Door	Scrapes	Positive	Yes	N/A	<8/3/2021	<8/3/2021	<8/3/21	8/3/2021	100	3	Yes	<5 ug	INCLUDES TWO DOORS		
2	7510	1	1	MMC Library	Yes	Door Frame	Flaking/Cracking	Positive	Yes	N/A	<8/3/2021	<8/3/2021	<8/3/21	8/3/2021	100	SAA	SAA	SAA	Includes two doors		

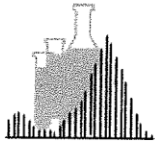




## APPENDIX D

### SAMPLE RESULTS TABLE

Dedicated to a Cleaner  
Environment Since 1982



NY ELAP# 11993  
PCM, PLM, TEM & LEAD



**BATTA LABORATORIES, LLC**  
Delaware Industrial Park, 6 Garfield Way  
Newark, DE 19713-5817  
Tel. (302)737-3376 Fax (302)-737-5764

Newark, DE - Columbia, MD -  
Philadelphia, PA

Web: <http://www.battaenv.com>  
E-mail: [battaenv@battaenv.com](mailto:battaenv@battaenv.com)



**NVLAP**  
Lab Code: 101032-D

## REPORT OF ANALYSIS

<b>Report#:</b>	RP21080613		
<b>Project Number:</b>	21080529		
<b>Project Name:</b>	Batta Environmental Associates	<b>Date Sampled:</b>	08/03/2021
<b>Project Location:</b>	Bethune ES	<b>Sampled By:</b>	E. Drake
<b>Analyte Requested:</b>	Lead	<b>Date Received:</b>	08/05/2021
<b>Method</b>	Test Method: NIOSH 9100 / NIOSH 7082	<b>Date Analyzed:</b>	08/06/2021
<b>Matrix:</b>	Wipe	<b>Date Report Issued:</b>	08/06/2021

Lab Sample #	Client Sample ID	Sample Description	Sample Location	Sampled Area (ft <sup>2</sup> )	µg / sample	µg/ft <sup>2</sup>	Reporting Limit (µg/sample)
21080529.01	PB-01	Blank	N/A		<5	<5	5
21080529.02	PB-02	IMC Doorway	Flr.	1.00	<5	<5	5

Note: 1. Blank values were not subtracted from reported sample values; 2. Quality control results in this report are acceptable; 3. Results relate only to the items tested; 4. Batta Laboratories, Inc. is not responsible for sample collection, nor interpretations made by others; and 5. This report does not constitute endorsement by AIHA LAP, LLC., NVLAP and/or any other U.S. governmental agencies; 6. Lab results/calculations are reported in 2 significant figures. Clients data/measurements are reported as they were submitted; 7. EPA guidelines for clearance lead wipes have been set at the following levels: Floors not to exceed 10 ug/sq ft, window sills not to exceed 100 ug/sq ft, and window troughs not to exceed 400 ug/sq ft. Samples received in acceptable condition unless otherwise noted. 8. Clearance guidelines for OLHCHH, LBPHC and LHRD Grantees are set at the following levels: Floors not to exceed 10ug/sq ft, window sills not to exceed 100ug/sq ft, window troughs not to exceed 100ug/sq ft and porch floors not to exceed 40ug/sq ft. Samples received in acceptable condition unless otherwise noted. 9. This report must not be reproduced without the written approval of BATTA Laboratories.

Batta Lab strives on customer feedback to improve the quality of our services. Please e-mail your feedback to [feedback@battaenv.com](mailto:feedback@battaenv.com).

**Analyst:** Ariel Powers

**End of Report**

**QA/QC BY:** N.C. Batta/A. Yohn (QA/QC Officer)



LEAD WIPE SAMPLING & VISUAL OBSERVATION FORM

SITE	HOUSE #	STREET NAME	APT	BEDROOMS
Bethune ES	3301	Old York Road	-	-
CITY	STATE	INSPECTOR	INSPECTION DATE	
Philadelphia	PA	Stephen Woronicak	8/3/21	

Turn Around Time  
☐ Same Day  
☐ 24 Hours

Lab ID	Sample ID	Surface	Location	Sample Area	Visible Settled Dust/Paint Chips Seen?	Additional Potential Hazards Observed <sup>1</sup>	Comment for Potential Hazards Observed
01	Pb-01	---	Blank/Control	---	Yes or No	Yes or No	
02	Pb-02	Floor	IMC Doorway	12x12	Yes or No	Yes or No	
	Pb-03				Yes or No	Yes or No	
	Pb-04				Yes or No	Yes or No	
	Pb-05				Yes or No	Yes or No	
	Pb-06				Yes or No	Yes or No	
	Pb-07				Yes or No	Yes or No	
	Pb-08				Yes or No	Yes or No	
	Pb-09				Yes or No	Yes or No	
	Pb-10				Yes or No	Yes or No	
	Pb-11				Yes or No	Yes or No	
	Pb-12				Yes or No	Yes or No	

<sup>1</sup> Hazards such as Peeling or deteriorated paint within the scope of work as well as outside the scope of work that may be observed during the sampling

Name of Inspector/Assessor (Print) Emily Drake Certification Number(s): \_\_\_\_\_

Signature: [Signature] Date: 8/3/21

Sample Collected by: \_\_\_\_\_ Date: \_\_\_\_\_ Time: \_\_\_\_\_  
Sample Relinquished by: \_\_\_\_\_ Date: \_\_\_\_\_ Time: \_\_\_\_\_

NOTE:

BATA Environmental Associates, Inc. (BEA) has provided final clearance dust wipe sampling in accordance with the U.S. Department of Housing and Urban Development "Guidelines for the Evaluation and Control of Lead-Based Paint Hazards in Housing (Ch. 15, Section IV)". BEA has only provided dust wipe sampling of the interior of the property. Unless otherwise noted, no exterior sampling or soil sampling was completed. Visual examination was only completed for purposes of evidence of settled dust or possible hazards (i.e. peeling or deteriorated paint). BEA has no knowledge of the completed lead-hazard control work, the scope of the work, or the lead-hazard control specification. BEA makes no representation that the lead-hazard control work was completed as required or specified. • BEA has no knowledge if the property being sampled has received lead-hazard control as a result of a legal or regulatory proceeding. • This dust wipe clearance sampling is not intended to take the place of a lead risk assessment. • The results of the wipe tests pertain to the conditions that existed at the time of the sampling.

Sampling Strategy

- 1 Sill, 1 Floor from every bedroom
- 1 Trough from common area (ie Living Rm)
- 1 Trough from bedroom
- Minimum of 4 floors, 2 Troughs, 2 Sills
- Blank/Control



## **APPENDIX E**

### **ENVIRONMENTAL CONSULTANT CERTIFICATIONS**

**EHS TRAINING INSTITUTE, INC.**  
A Division of BATTI, Inc.

# **Certificate of Completion**

## **1-Day Initial**

### **Delaware Dust Wipe Technician**

### **EPA Lead Dust Sampling Technician**

**Awarded To:**  
English

**Emlyn Drake**

306 Buttonwood Road Landenberg, PA 19350

Who has successfully completed the attendance, hands-on, and testing requirements for this course.

**EHS TRAINING INSTITUTE, INC.**

A Division of BATTI, Inc.  
Delaware Industrial Park • 6 Garfield Way  
Newark, DE 19713-5817  
(302) 737-3376 • Fax (302) 737-5764





Todd K. Zeisloft, Training Manager



Todd K. Zeisloft, Principal Instructor

Course Date: May 1, 2019 Exam Date: May 1, 2019  
Certification Number : TP-DWT-I-18-0027-18-00001  
DE Exp May 1, 2021 EPA Exp May 1, 2024



**EHS TRAINING INSTITUTE, INC.**  
A Division of BATTI, Inc.

# **Certificate of Completion**

## **1-Day Initial Delaware Lead Renovator (RRP)**

*English*


**Awarded To:**  
**Emlyn Drake**  
306 Buttonwood Rd Landenberg, PA 19350

Who has successfully completed the attendance and testing requirements for this course.

**EHS TRAINING INSTITUTE, INC.**  
A Division of BATTI, Inc.  
Delaware Industrial Park • 6 Garfield Way  
Newark, DE 19713-5817  
(302) 737-3376 • Fax (302) 737-5764



Course Date: **March 21, 2019** Exam Date: **March 21, 2019**  
Certification Number : **TP-RRP-I-18-0013R-00032**  
DE Exp **March 21, 2021** EPA Exp **March 21, 2024**

  
Todd K. Zeisloft, Training Manager

  
Todd K. Zeisloft, Principal Instructor



## **APPENDIX F**

### **PAINT CONTRACTOR CERTIFICATIONS OR TRAINING DOCUMENTS**



# ***CRITERION LABORATORIES, INC.***

400 STREET ROAD, BENSALEM, PA 19020  
PHONE: (215) 244-1300, FAX: (215) 244-4349  
WWW.CRITERIONLABS.COM

## ***Certificate of Attendance and Successful Completion***

**Lead RRP Initial – English**  
**Per 40 CFR Part 745.225**

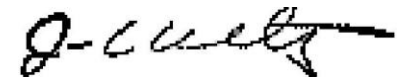
***Timothy Creighton***

**4414 Edgemont Street, Philadelphia, PA 19137**

**Certificate Number: R-I-19014-17-745423**



***Course Date: 11/17/2017***  
***Examination Date: 11/17/2017***  
***Expiration Date: 11/17/2022***

A handwritten signature in black ink, appearing to read 'J. Weltz'.

---

**JAMES A. WELTZ, CIH**  
***Training Manager / Principal Instructor***

# ***CRITERION LABORATORIES, INC.***

400 STREET ROAD, BENSALEM, PA 19020  
PHONE: (215) 244-1300, FAX: (215) 244-4349  
WWW.CRITERIONLABS.COM

## ***Certificate of Attendance and Successful Completion***

**Lead RRP Initial – English**  
**Per 40 CFR Part 745.225**

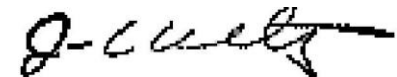
***David Sienko***

**461 Paoli Ave., Philadelphia, PA 19128**

**Certificate Number: R-I-19014-17-745424**



***Course Date: 11/17/2017***  
***Examination Date: 11/17/2017***  
***Expiration Date: 11/17/2022***



---

**JAMES A. WELTZ, CIH**  
***Training Manager / Principal Instructor***