

SUMMARY OF PAINT AND PLASTER STABILIZATION ACTIVITES

at the

PRINCE HALL ELEMENTARY SCHOOL

**6101 N. GRATZ STREET.,
PHILADELPHIA, PA 19141**

Prepared For:

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Prepared by:



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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 Prince Hall School located at 6101 N. Gratz St. 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 Colormetric 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 ²) or entire surface of component if surface area is less than 40 ft ² . One (1) wipe for every window sill.	Qualitative	<ul style="list-style-type: none"> Qualitative testing based on cleanliness (white glove test). According to RRP, the areas pass after the third cleaning, regardless of verification.
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"> Qualitative testing based on colorimetric visual comparison. Lower Limit of Visual Detection is 18 micrograms per ft² (µg/ft²) of lead. False positive and false negative interferences from silver, cadmium, barium, mercury, and titanium (percentages unknown). Involves field preparation of sampling media using reagents.
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"> Interior Floors and Desks: < 10 µg/ft² Window Sills: < 100 µg/ft² per HUD.

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

1. A scope of work was developed for the Prince Hall Elementary 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 Prince Hall Elementary School can be found in appendix A of this report.

B. EPA Checklist

1. Throughout the paint and plaster stabilization work, BATTAs 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 Prince Hall Elementary School is included in Appendix B of this report.

C. Oversight

1. Throughout the paint and plaster stabilization project, BATTAs 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 Prince Hall Elementary School is included in Appendix C of this report.

D. Sample Results

1. Throughout the paint and plaster stabilization project, BATA 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. – Not Applicable.
2. The Sample Results Table for the Prince Hall Elementary School is NOT APPLICABLE for this report. Painters did not perform RRP work.
3. Refer to Appendix D for Environmental Consultant Certifications, and Appendix E for Paint Contractor Certifications or Documentation of Training (certifications of the individuals performing the paint work/training were provided to the SDP prior to the work).

BATA 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 BATA Environmental if you have any questions.



APPENDIX A

SCOPE OF WORK TABLE

ULCS#	E	Biogem#	F	Space #	Space Type	On-Site Room Name	Student	Component	Substrate Material	Color	Description of Damage	Damage	XRF Reading	XRF	Asbestos Paint	Contents Need to	On-going	Plastering	Asbestos	Comments/ Descriptions/ Notes
7490	1	B749001-1	4	H215	Circulation (Hallway)	Hallway at Classrooms 206 to 209	Yes	W1	Block	Blue	Cracking	0	1.1	Positive	Negative	No	No	No	No	N/A; previously
7490	1	B749001-1	2	H215	Circulation (Hallway)	Hallway at Classrooms 206 to 209	Yes	W2	Block	Blue	None	0	N/A	N/A	Negative	No	No	No	No	N/A; previously
7490	1	B749001-1	2	H215	Circulation (Hallway)	Hallway at Classrooms 206 to 209	Yes	W3	Block	Blue	Cracking	0	U2	Negative	Negative	No	No	No	No	N/A; previously
7490	1	B749001-1	2	H215	Circulation (Hallway)	Hallway at Classrooms 206 to 209	Yes	W4	Block	Blue	None	0	N/A	N/A	Negative	No	No	No	No	N/A; previously
7490	1	B749001-1	2	H215	Circulation (Hallway)	Hallway at Classrooms 206 to 209	Yes	Ceiling	Drop Ceiling	White	None	0	N/A	N/A	Negative	No	No	No	No	
7490	1	B749001-1	2	H215	Circulation (Hallway)	Hallway at Classrooms 206 to 209	Yes	Floor	12 x 12 tile	Tan	None	0	N/A	N/A	Negative	No	No	No	No	



APPENDIX B

EPA CHECKLIST TABLE

Task ID	E l e m e n t	F l o o r	On Site Room Name	Student/ Teacher Occupied	Component	Description of Paint and Plaster Damage	XRF (positive/ negative)	Name of Firm	Date of Renovation	Brief Description of Renovation	Name of Assigned Renovator	Name(s) of Trained Worker (s), if used	Name of Dust Sampling Technician, Inspector, or Risk Assessor, if used	Copies of renovator and dust sampling technician qualifications (training certificates, certifications) on file	Certified renovator provided training on posting warning signs
1	1	2	Hallway at Classrooms 206 to 209	Yes	W1	Cracking	Positive	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A

Task ID	E l e m e n t	F l o o r	On Site Room Name	Certified renovator provided training to workers on setting up plastic containment barriers	Certified renovator provided training to workers on maintaining containment	Certified renovator provided training to workers on avoiding spread of dust to adjacent areas	Certified renovator provided training to workers on waste handling	Certified renovator provided training to workers on post-renovation cleaning	Certified renovator provided training to workers on test kit or test results from an EPA-recognized laboratory on collected paint chip sample, used by certified renovator to determine whether lead was present on components affected by renovation	If yes to the previous, identify the method used, type of test kit used (if applicable), laboratory used to conduct paint chip analysis, describe sampling location and results	Warning signs posted at entrance to work area	Work area contained to prevent spread of dust and debris	All objects in the work area removed or covered (interiors)	HVAC ducts in the work area closed and covered (interiors)
1	1	2	Hallway at Classrooms 206 to 209	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A

Task ID	E l e m e n t	F l o o r	On Site Room Name	Windows in the work area closed (interiors)	Doors in the work area closed and sealed (interiors)	Doors that must be used in the work area covered to allow passage but prevent spread of dust	Floors in the work area covered with taped-down plastic (interiors)	Waste contained on-site and while being transported off-site	Work site properly cleaned after renovation	All chips and debris picked up, protective sheeting misted, folded dirty side inward, and taped for removal	Light lenses inspected (Y/N)	Surfaces above light fixtures inspected (Y/N)	Work area surfaces and objects cleaned using HEPA vacuum and/or wet cloths or mops (interior)	Certified renovator performed post-renovation post-cleaning verification	Describe the results of post-renovation cleaning verification, including the number of wet and dry cloths used
1	1	2	Hallway at Classrooms 206 to 209	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A

Task ID	E l e m e n t	F l o o r	On Site Room Name	If dust clearance testing was performed instead, attach a copy of the report	I certify under penalty of law that the previous information is true and complete (name and title)	Date signed
1	1	2	Hallway at Classrooms 206 to 209	N/A	N/A	N/A



APPENDIX C

OVERSIGHT TABLE

Task ID	ULCS#	E l e m e n t	F l o o r	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
1	7490	1	2	Hallway at Classrooms 206 to 209	Yes	W1	Cracking	Positive	N/A	N/A	N/A	8/3/21	N/A	N/A	N/A

Task ID	ULCS#	E l e m e n t	F l o o r	On Site Room Name	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	7490	1	2	Hallway at Classrooms 206 to 209	N/A	N/A	N/A	N/A	NAD- previously	NO RRP



APPENDIX D

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

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**

Todd K. Zeisloft, Training Manager

Todd K. Zeisloft, Principal Instructor

EHS TRAINING INSTITUTE, INC.
A Division of BATA, 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 BATA, 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 E

**PAINT CONTRACTOR CERTIFICATIONS OR TRAINING
DOCUMENTS**

CRITERION LABORATORIES, INC.

400 STREET ROAD, BENSLEM, 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

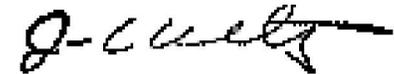
Timothy Creighton

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



JAMES A. WELTZ, CIH
Training Manager / Principal Instructor

CRITERION LABORATORIES, INC.

400 STREET ROAD, BENSLEM, 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

A handwritten signature in black ink, appearing to read "J. Wertz". The signature is written in a cursive, flowing style.

JAMES A. WELTZ, CIH
Training Manager / Principal Instructor