Lead-Based Paint Inspection and Risk Assessment Report

REMS No.: 800022675
Parkway Apartments
3970 West Lake Sammamish Parkway Northeast
Redmond, Washington 98052-5836

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SECTION 1: EXECUTIVE SUMMARY

1.1 INTRODUCTION

A Lead-Based Paint Inspection/Risk Assessment (Evaluation) was conducted from October 21, 2003 through October 23, 2003, at the Parkway Apartments, Redmond, Washington, REMS No. 800022675. The lead-based paint inspection was performed to identify paint that contains lead above allowable levels. The risk assessment identifies housing conditions called lead-based paint hazards that could result in harm to residents, workers, and especially to young children. This evaluation report can help Owners develop a plan for eliminating any lead-based paint hazards that were found, and may aid in establishing an ongoing lead-based paint maintenance and re-evaluation program, if needed.

Property Owners may wish to consider contracting a Washington State licensed lead-based paint risk assessor to elaborate on concerning the information and recommendations provided in this report.

1.2 SUMMARY OF PROPERTY EVALUATION

The evaluation found that lead-based paint (defined in section 2.2), lead-based paint hazards (defined in section 2.2), dust-lead hazards (defined in section 2.2), and soil-lead hazards (defined in section 2.2) were not present at the property as a whole on the date of the evaluation. Thirty-seven (37) units were recently renovated.

Table 1-1: Property Summary

REMS Number: 800022675	Property Name: Parkway Apartments
Lead-Based Paint Present	No
Lead-Based Paint Hazards Present	No
This property is exempt from HUD's Lead Safe Housing Rule. No further action is required under that rule.	

1.2.1 Building Groups

Individual buildings were grouped into "similar groups of buildings" in accordance with HUD Guidelines. This ensures consistency during the evaluation of the property. The buildings and exterior sites were grouped according to: 1) construction date, 2) construction type, and/or 3) written documentation or visual evidence of similar construction materials criteria.

There was one building on the property. The building was constructed in 1971 and appears to have been constructed with similar construction materials and methods throughout. The same could be said for exterior structures and common areas.

The table provided below lists the building:

Table 1-2 Similar Building

REMS Number: 800022675			Property Name: Parkway Apartments		
Total Number of Buildings:	**1**	**Total Number of Units:**	**41**	**Total Number of Units Evaluated:**	**21**
3970 Lake Sammamish Parkway NE					

1.3 SUMMARY OF LEAD-BASED PAINT AND LEAD-BASED PAINT HAZARDS

No lead-based paint or lead-based paint hazards were found on the property above the EPA regulatory level. See section 2.2, Lead Regulatory Levels, Table 2-2.

1.4 PROPERTY-WIDE LOCATIONS OF BUILDING COMPONENTS WITH LEAD-BASED PAINT

No building components on the property were found to contain lead-based paint above the EPA regulatory level. See section 2.2, Lead Regulatory Levels, Table 2-2.

1.5 PROPERTY-WIDE SUMMARY OF LEAD-BASED PAINT AND/OR LEAD HAZARDS

No lead-based paint or lead-based paint hazards were found on the property above the EPA regulatory level. See section 2.2, Lead Regulatory Levels, Table 2-2.

1.6 SUMMARY OF REGULATORY REQUIREMENTS AND RECOMMENDATIONS

Lead-based paint and lead-based paint hazards, as defined by EPA, were not identified at the property.

The results of this evaluation indicate that no lead in amounts greater than or equal to 1.0 mg/cm² in paint was found on any building components, using the inspection protocol in Chapter 7 of the *HUD Guidelines for the Evaluation and Control of Lead-Based Paint Hazards in Housing (1997 Revision)*. Therefore, this dwelling qualifies for the exemption from the Lead Safe Housing Rule in 24 CFR part 35 for target housing receiving project-based rental assistance. Additionally, no lead hazards were found that meet or exceed the Federal regulatory levels at this property. However, reasonable care should be taken during the disturbance of painted surfaces to minimize dust and debris, because some paint may exist with lower levels of lead. The Property Owner should also continue to monitor for future changes in paint condition. These changes may be caused by normal wear and tear, routine operations and maintenance work, rehabilitation and repair activities, or failure of a building system.

More information is available from a certified risk assessor, HUD's lead website (www.hud.gov/offices/lead), the Lead Listing (www.leadlisting.org), or the National Lead Information Clearinghouse (1-800-424-LEAD).

1.7 LEAD DISCLOSURE REQUIREMENTS

HUD requires Owners to disclose the findings of this report to residents within a prescribed period if lead-based paint is present. In addition, depending on the findings of the evaluation, an Owner may be required to conduct additional disclosure activities. As a result, based on the findings of this evaluation the following disclosure statements apply:

The Residential Lead-Based Paint Hazard Reduction Act of 1992 directed EPA and HUD to jointly issue regulations requiring disclosure of known lead-based paint and/or lead-based paint hazards by persons selling or leasing housing constructed prior to 1978. These regulations (with identical wording 24 CFR Part 35, and 40 CFR Part 745), known as the lead disclosure rule, were published on March 6, 1996.

Lead-based paint, as defined by EPA, was not identified at the property.

This report should be kept by the inspector, the Owner, and future Owners for the life of the dwelling.

In the event that the property is offered for sale, the report, issued in its entirety, must be provided to the new Owner before the new Owner becomes obligated under a sales contract. Sellers are required to include an educational pamphlet approved by the EPA

and standard warning language in their sales contracts to ensure that the new Owner has information regarding lead-based paint hazards.

1.8 Option of Additional Testing

This property was found to be free of lead-based paint and lead-based paint hazards according to the EPA definition. The requirements described in this report are based on lead evaluations for randomly selected units and common areas. Untested units and common areas are assumed to be similar to these randomly selected ones. There are no additional requirements for the owner at this time.

1.9 MINIMUM REQUIREMENTS TO CONTROL LEAD-BASED PAINT HAZARDS

No lead-based paint or lead-based paint hazards were found that meet or exceed Federal regulatory levels. No control measures are required at this time. However, reasonable care should be taken during any paint disturbance to minimize dust and debris, as some paint may contain lead at lower levels.

1.9.1 Paint-Lead Hazards

There are no paint-lead hazards and the Owner is not required to take any further action.

1.9.2 Dust-Lead Hazards

There are no dust-lead hazards and the Owner is not required to take any further action.

1.9.3 Soil-Lead Hazards

There are no soil-lead hazards and the Owner is not required to take any further action.

SECTION 2: LEAD-BASED PAINT INSPECTION AND RISK ASSESSMENT (EVALUATION) REPORT

2.1 OVERVIEW OF THE EVALUATION

2.1.1 Introduction

A Lead-based paint inspection and lead-based paint risk assessment (evaluation) was conducted at the multifamily residential property, REMS No. 800022675, Parkway Apartments, 3970 Lake Sammamish Parkway Northeast, Redmond, Washington, from October 21, 2003 through October 23, 2003. Federal Occupational Health conducted the evaluation. Anthony Fullerton, a certified risk assessor in the State of Washington, and Ingrid Holznagel, a certified lead-based paint inspector in the State of Washington, performed the fieldwork. The credentials of these personnel and of their firm are described in Appendix G: Certifications, Licenses, and Accreditations. The purpose of the evaluation was to determine the presence and location of lead-based paint hazards and lead-based paint. To the knowledge of these Assessors, based on conversations with the Property Owner's representative, Carma Oaksmith, of King County Housing Authority, there has been previous bulk lead-based paint testing at this property, however, no samples were analyzed. No other information regarding the previous testing was given.

These evaluation activities will help the Owner to ensure the health and safety of the residents, especially children, and the workers. As part of the evaluation, a visual assessment of the entire property and all structures was performed, an interview with the property manager was conducted, a lead-based paint inspection was performed, and dust wipe and composite soil samples were taken. A lead-based paint inspection using an x-ray fluorescence (XRF) lead-in-paint analyzer was performed in each selected dwelling unit and common area. The results of the evaluation on the selected dwelling units apply to all similar buildings and dwelling units within a similar group of buildings throughout the entire property. See Section 4, Appendix A: Property Information, for complete building information.

2.1.2 Description of Property

The Parkway Apartments, built in 1971, consist of one 1 three-story residential building with thirteen (13) dwelling units on the first floor, fourteen (14) dwelling units on the second floor, and fourteen (14) dwelling units on the third floor. There are five 5 common areas; a recreation room that is located on the first floor, three storage/laundry rooms located on the first, second, and third floors, and a stairwell area connecting the storage/laundry rooms. The exterior child-play areas exist on the east side of the building and include a concrete basketball court and nearby playground equipment (located in the grass). Onsite parking, sidewalks, and turf-covered areas constitute the remainder of the site.

Detailed information on the property, which includes the property plan and unit plans, are provided in Section 4, Appendix A: Property Information.

2.1.3 Similar Groups of Buildings

Buildings were grouped into "similar groups of buildings" to ensure consistency during the evaluation of the property. Additionally, this ensured an accurate random selection for inspection. The buildings and exterior sites were grouped according to construction date, construction type, and/or written documentation or visual evidence of similar construction materials criteria. There is one 1 building. The following characteristics determine the buildings:

> The Building – Date of construction adheres to the age group 1960-1977, construction type adheres to the category of low rise/garden apartments, and similar construction materials adhere to the category of wood frame construction.

The building within each group are provided in Table 2-1.

Table 2-1: Similar Building

REMS Number: 800022675	**Property Name: Parkway Apartments**
The Building:	
3970 West Lake Sammamish Parkway NE	

2.1.4 Random Selection Process

Selection of the specific dwelling units and common areas to be tested was accomplished using the HUD-defined selection as specified in the *U.S. Department of Housing and Urban Development; Guidelines for the Evaluation and Control of Lead-Based Paint Hazards in Housing; Chapter 7, Lead-Based Paint Inspection (1997 revision); Section V. Inspections in Multifamily Housing.* A comprehensive table that provides all units randomly selected, as well as substitutes, is provided in Section 4, Appendix B. Units that were removed from the random selection process, including an explanation as to why they were removed, are also provided in Section 4, Appendix B.

The random numbers were assigned using a random number generator (10-digit scientific calculator). The random numbers generated are from 0 to 1. Each random number was multiplied by the total number of dwelling units, (41). The product generated a number between 1 and 41. The number was rounded up to reflect the unit selected. Each dwelling unit was given a number in sequential order from 1 to 41 and selected according to the number generated. 21 units were randomly selected along with several alternates. All common areas were tested (or common areas were selected using the same process).

During this evaluation, randomly sampled dwelling units and areas were statistically selected to represent all units and areas on the entire property. Only the randomly selected units and areas were tested for the presence of lead-based paint and lead-based paint hazards. The lead-based paint and lead-based paint hazards found in the units and buildings evaluated are presumed to be present in all similar untested dwelling units and areas within similar groups of buildings of the property unless further testing indicates otherwise.

2.2 LEAD REGULATORY LEVELS

The lead regulatory levels provided below are those used when preparing this lead-based paint evaluation and when evaluating data collected. The EPA regulatory levels are the same as the State of Washington's regulatory levels provided in the following table.

TABLE 2-2: LEAD REGULATORY LEVELS

REMS Number: 800022675	Property Name: Parkway Apartments
	EPA Levels
Lead-Based Paint	1.0 mg/cm^2 or 0.5% by weight (or 5,000 ppm)
Lead in Dust	
Floor	40 µg/ft^2
Window Sill	250 µg/ft^2
Lead in Bare Soil	
Child-Play Areas (dwelling perimeter and yard)	400 ppm (µg/g)
Rest of the Yard (dwelling perimeter and yard)	1,200 ppm (µg/g)

2.3 LEAD-BASED PAINT INSPECTION

This lead-based paint inspection is an interior and exterior investigation to identify all lead-based paint on a surface-by-surface basis. A lead-based paint inspection conforming to these HUD guidelines was performed at twenty-one (21) randomly selected dwelling units. An average of fifty-three (53) tests were taken at all identified surfaces on the inside of each evaluated apartment dwelling unit using an X-ray fluorescence (XRF) analyzer. All common areas were tested, and an average of eleven (11) tests were taken in each common area. An average of twenty-five (25) tests were taken on exterior surfaces of the building. A total of 1,130 tests and 93 calibration readings were taken throughout the Parkway Apartments inspection. No paint chip samples were collected as part of this assessment. Drawings that provide unit and

property floor plans have been provided in Section 4, Appendix A-5. The drawings identify dust wipe sample locations and wall labels (A, B, C, D wall etc.).

Lead-based paint was not found on the interior or the exterior of any building component, including, walls/wall trim, ceilings, support beams, door/door trim, kitchen cabinets, bathroom cabinets, window trim/sills, electrical panels, and exterior stair and porch components.

Some testing combinations on interior and exterior surfaces did not have enough additional components to increase their sample size to 40. These included painted drywall support beams, painted metal electrical panels, painted metal doors, painted wood window sills, painted concrete floors, and all painted exterior components.

To ensure data generated during the inspection are accurate, the inspector performed a calibration of the XRF analyzer in accordance with the protocol described in the instrument's Performance Characteristics Sheet (PCS). The calibration check readings were recorded at the beginning of the inspection shift, at least every four hours during the inspection shift, at the end of each inspection shift when the machine is shut down, and every time during the inspection shift that the machine is turned off and then turned back on.

Testing was performed by Ingrid Holznagel, Lead-Based Paint Inspector, State-Certified Lead-Based Paint Inspector, using the Niton XL 309 (SN U3989NR4788). The credentials are provided in Section 4, Appendix G: Certifications, Licenses, and Accreditations. The XRF analyzer is designed to measure the lead content of surface coatings on a variety of building surfaces, substrates, and components. The measurement is rapid, nondestructive, and according to the manufacturer, capable of detecting lead concentrations that occur within numerous layers of various surface coatings.

The sequence of XRF testing locations was completed for each unit as described in the following paragraphs.

Each dwelling unit was broken up into room equivalents and assigned a room number. Rooms were numbered clockwise from the first room selected.. Refer to appendix A-5 for detailed drawings

In each room, the wall closest to the street address side of that particular building was always labeled side A and tested first. Then, in a clockwise fashion the remaining walls were labeled side B, C, and D and tested in that order. All ceilings and other attached painted surfaces (e.g. doors and window casing components) were tested but not always in order. There are instances when a wall or other painted surface could not be tested due to obstructions present during the time of this evaluation. These surfaces, in all cases, had the same painting history as the rest of the room. All practical efforts were made to test each and every surface.

Please refer to the XRF Testing Results Section 4, Appendix C: XRF Sampling Data for the detailed analytical testing results for each distinct area or unit inspected. The reports provide complete testing data (Detailed Report), a summary of surfaces and components identified with lead-based paint coatings (Summary Report), and a distribution report detailing the lead concentrations on specific components or surfaces (Distribution Report).

2.4 RISK ASSESSMENT OVERVIEW

This risk assessment is an onsite interior and exterior investigation to discover any lead-based paint hazards. A risk assessment conforming to HUD guidelines was performed at the same randomly selected dwelling units where the lead-based paint inspection was conducted. The risk assessment was conducted by Anthony Fullerton, Risk Assessor, State-Certified Risk Assessor, and his credentials are described in Section 4, Appendix G: Certifications, Licenses, and Accreditations.

There were no types of lead-based paint hazards identified at this property at the time of the inspection.

Several report sections describe the risk assessment process. Section 2.5.1, Paint-Lead Hazards, describes how and where these hazards, if present, were identified. Section 2.3, Lead-Based Paint Inspection, describes how walls were labeled for both the lead-based paint inspection and risk assessment. Section 2.6, Interior Dust Sampling, describes how and where dust samples were collected from floors and interior window sills. Section 2.7, Soil Sampling, describes how and where soil samples were collected from bare soil at the drip lines, and in children's play areas. These field dust and soil samples, and blank and spike dust samples, were analyzed for lead, as described in the laboratory reports in Appendices E: Dust Wipe Sample Analytical Data, and F: Soil Sample Analytical Data, mentioned in sections 2.6 and 2.7, respectively.

Section 1.6, Summary of Regulatory Requirements and Recommendations, and section 1.7, Lead Disclosure Requirements, provide information regarding use of the risk assessment findings.

To aid in the interpretation of the listed findings, a glossary of terms and a list of publications and resources addressing lead-based paint hazards and their health effects are included at the end of this report, in Section 4, Appendix I.

2.5 PAINT CONDITION SURVEY AND PAINT-LEAD HAZARDS

Please Note: HUD and EPA have provided specific definitions for the terms *deteriorated paint, intact paint,* and *de minimis (small or minimal) levels* when these terms are used to describe surface coating conditions and areas. De minimis (small or minimal) is defined in Table 2-3, HUD Definitions. *Deteriorated paint* is defined as "any interior or exterior paint or other coating that is peeling, chipping, chalking, or cracking or any paint or coating located on an interior or exterior surface or fixture that is otherwise damaged

or separated from the substrate." This definition is most typically associated with surface conditions only. The definitions of *deteriorated paint, intact paint, and de minimis (small or minimal) levels* are listed below and most typically are associated with surface conditions only. To aid in the interpretation of the paint condition information, please refer to the following HUD definitions and criteria for specific interior and exterior surfaces.

HUD/EPA Definitions for *intact paint, deteriorated paint* and *de minimis (small or minimal) levels of deteriorated paint* are explained below. HUD uses the phrase "significant deterioration" to refer to amounts of deterioration greater than the *de minimis (small or minimal)* levels. Similarly, "significant disturbance" refers to amounts of disturbance, such as in a large rehabilitation project, greater than the *de minimis (small or minimal)* levels.

Table 2-3: HUD Definitions

Building Component(s)	Intact Paint	*De minimis (small or minimal) Levels of* Deteriorated Paint
Exterior components with large surface areas (siding, etc.)	Entire surface is intact	Deteriorated paint on less than or equal to 20 square feet (ft^2) of exterior surfaces
Interior components with large surface areas (walls, ceilings, etc.)	Entire surface is intact	Deteriorated paint is observed at less than or equal to 2 (ft^2) of surface in any one interior room or space
Component types with small surface areas (soffits, baseboards, trim, etc.)	Entire surface is intact	Deteriorated paint is observed at less than or equal to 10% of the total surface area of a component type with a small surface area
Note: See 24 CFR 35.1350(d)1-3 for complete information on de minimis *(small or minimal) levels.*		

Paint conditions and exact locations of paint deterioration for specific tested dwelling units are reported in this document under Section 4, Appendix D: Paint Conditions Survey Results, details areas of deteriorated paint discovered during the evaluation.

Areas and/or components coated with lead-based paint that are currently *intact* do not constitute a lead hazard if the components do not represent a friction or impact surface (e.g., the windowsill, or floor). However, be certain to follow the operation and maintenance plan and use lead-safe work practices when dealing with any surfaces that are known or assumed to contain lead-based paint.

2.5.1 Paint-Lead Hazards

As of the evaluation date, the exterior painted wood and metal components of the structures were in reasonably good structural condition, as were the interior gypsum wallboard, ceiling surfaces, and interior wood trim components. Paints throughout the interior of the structures were primarily intact. The degree of paint deterioration is minimal (*de minimis levels*).

The results of the assessment demonstrated that no deteriorated paint hazards exist.

A list of sampling locations and their associated lead levels with XRF and analytical laboratory results for paint, dust, and soil can be found in Section 4, Appendices.

2.6 INTERIOR DUST SAMPLING

Dust wipe samples were collected to identify those locations where dust levels exceed the regulatory levels identified in Table 2-2 and a dust-lead hazard may be present.

One hundred ninety-eight (198) dust wipe samples were collected from twenty-one (21) apartment dwelling units in the building, and twelve (12) dust wipe samples were collected from common areas to determine the levels of lead-containing dust on the interior window sills and floors where accessible. One floor and one windowsill dust wipe sample were collected in each area/room of each unit. If there was no window a sill sample was not collected.

Of the dust samples collected, nine (9) field blanks and six 6 spiked wipe samples were sent to the lab for quality assurance. HUD protocol requires the preparation of blind spiked samples at the rate of one per fifty (50) wipe samples, and the submission of blank samples at the rate of one per 20 wipe samples.

Please refer to Section 4, Appendix E: Dust Wipe Sample Analytical Results, for the laboratory reports and to Appendix I: Lead and Lead Safety Resource Data for a list of publications and resources addressing lead-based paint hazards and their health effects; both are located at the end of this report.

All testing locations registered lead levels below the EPA dust hazard level. Complete dust wipe collection detail, sample location, and analytical results for each dwelling unit assayed are included in Section 4, Appendix E: Dust Wipe Sample Analytical Data.

2.7 SOIL SAMPLING

Soil samples were collected at varying locations on the property to identify potential sources of lead that are accessible by children. Soil samples were collected along the dripline on the back of the building. A dripline is a bare soil area adjacent to buildings where precipitation (rain, snow, etc.) has come in contact with the roof or exterior surface and dripped into the bare/exposed soil. Soil samples were also collected from bare/exposed soil areas where children may play or frequent. Soil samples were collected from each bare soil area that was greater than nine (9) square feet. Within each of the sample locations, a number of small soil samples were collected to create a composite soil sample for each sample location.

Two 2 composite soil samples were collected at this property; one 1 from the east play area around the perimeter of the playground equipment, and one 1 from the dripline on the east side of the building. A composite sample is a sample containing soil from a

stated number of locations mixed together to form a composite sample. The samples were collected from bare soil areas. The analytical results did not identify hazardous lead concentrations as defined by EPA.

Please refer to Section 4, Appendix F: Soil Sample Analytical Data, for the detailed analytical reports.

2.8 LEAD-SAFE WORK PRACTICE REQUIREMENTS FOR MAINTENANCE, RENOVATION OR REMODELING

No lead-based paint and/or lead-based paint hazards have been identified at the Parkway Apartments that require lead-safe work practices and lead-based hazard controls to be implemented for any hazard control activity, repair, remodeling, or renovation effort.

2.9 LEAD-BASED PAINT HAZARD CONTROL PLAN

No lead-based paint and/or lead-based paint hazards have been identified at the Parkway Apartments that require a lead-based paint hazard control plan to be implemented.

2.10 OPTION FOR ADDITIONAL TESTING

This Property was found to be free of lead-based paint and lead-based paint hazards according to the EPA definition. The requirements described in this report are based on lead evaluations for randomly selected units and common areas. Untested units and common areas are assumed to be similar to these randomly selected ones. There are no additional requirements for the Owner at this time.

2.11 CONDITIONS AND LIMITATIONS—DISCLAIMER

Federal Occupational Health (the Preparer) has performed this lead-based paint inspection and risk assessment in a thorough and professional manner consistent with commonly accepted industry standards. The Preparer cannot guarantee and does not warrant that this evaluation has identified all adverse environmental factors and/or conditions affecting this property on the date of the evaluation.

The results reported and conclusions reached by the Preparer are solely for the benefit of the Owner and residents. The results and opinions in this report, based solely on the conditions found at the property on the date of the evaluation, are valid only on that date. The Preparer assumes no obligation to advise the client of any changes in any real or potential lead-based paint hazards at this residence beyond the date of the property evaluation.

HUD is not responsible for the accuracy or completeness of this lead-based paint inspection and risk assessment or the report.