April 26, 2005

Sheri Johnson
4005 Ironwood Trail North
Lake Elmo, MN 55042

RE: HUD Lead-Based Paint Inspection/Risk Assessment Report for *Grad Pre' by the Park* Apartment Complex, Located at 200 South Winthrop, St. Paul, Minnesota
Sheri Johnson Phone Number: 651-704-9662

Dear Sheri Johnson:

At your request, Midwest Environmental Consulting, L.L.C. (MEC) performed a combination HUD lead-based paint inspection and risk assessment of the multi-family residential property known as *Grand Pre' by the Park*, located at 200 South Winthrop, St. Paul, Minnesota, on January 6, 11, 13, 18, 19, 24, 25, 27 and April 22, 2005.

Andrew Myers, Environmental Project Manager with MEC, performed all field work relating to this project. Mr. Myers is a trained and licensed Minnesota Lead Risk Assessor (MN #578). MEC credentials are found in Appendix A.

The purpose of this project was to determine whether lead-based paint, or other lead hazards are present on the interior or exterior surfaces of the complex. This report contains the results of the HUD lead-based paint inspection.

MEC used the risk assessment protocol described in the U.S. Department of Housing and Urban Development (HUD) "*Guidelines for the Evaluation and Control of Lead-Based Paint Hazards in Housing*." The paint inspection was conducted using elements from the same HUD document as revised in October 1997.

SITE DESCRIPTION

The multi-family residential property known as *Grand Pre' by the Park*, is located at 200 South Winthrop, St. Paul, Minnesota, is a four-story, wood-framed apartment complex constructed in approximately 1977. The complex has 216 individual units, plus several common areas, including a pool room and an exercise room.

The interior of the complex consists of painted drywall walls and ceilings throughout, with carpeted floors, with the exception of vinyl in the kitchen and glazed tile in the bathrooms of the units. Window systems throughout the complex consist of a combination of vinyl windows and wood window systems. Wood patio doors are present in the units, with access out to a patio/deck area.

The exterior of the complex consists of brick with wood trim present. Anodized aluminum entry doors are present. An underground garage is also present, under the complex.

Children under the age of six (6) years old, currently reside in the complex.

Bare soil was not present on the property, on the days of the site investigation.

RESULTS OF PAINT INSPECTION

MEC used a paint inspection sampling strategy as described in the HUD Guidelines (1995 with revised 1997 Chapter 7). The results of portable x-ray fluorescence (XRF) analysis of representative building components in each functional area or room are shown in Appendix B. Results are organized and shown in actual sequence of analysis. All tests were made using a Niton® XL 309 X-ray Fluorescence Spectrum Analyzer (Serial # 528). The Cadmium was resourced in August 2004.

XRF analytical results in Appendix B, in the column labeled "Results" represent lead concentrations per square centimeter of painted surface (mg/cm^2).

HUD regulations 24 CFR Part 35 et.al, the HUD *Guidelines*, the Environmental Protection Agency (EPA), and the Minnesota Department of Health (MDH) define the paint action level as a lead concentration at or above the level of 1.0 mg/cm^2 when measured with a portable XRF instrument (0.5% by weight when measured by laboratory methods).

The lead-based paint inspection protocol described in the HUD *Guidelines* relies on a statistical approach for result interpretation. Tests are performed on each test combination. A test combination consists of unique combinations of substrate, color, building component, and location.

XRF results are classified as positive or negative. A positive classification indicates that lead is present on the testing combination at or above the HUD standard. It is important to note that positive and negative results apply not only to the actual testing combination, but also to any repetitions of the testing combination in the room or area that were not tested.

Appendix B includes a record of XRF calibration checks. Those checks were performed on thin films supplied by the XRF manufacturer; they contain known concentrations of lead. The graphs in that appendix show the variation of quality control with time. The assays in the table of raw data (Appendix B) that are labeled "Calibrate" indicate that they are for quality control. Additional quality control data and information are available to you upon request.

A description of the sample locations used throughout this inspection can be found in the front of Appendix B. For purposes of this inspection this property is referred to as Sites 1 - 48, as described below.

Site 1: Floor 1, Unit 106	Site 2: Floor 4, Unit 444
Site 3: Floor 4, Unit 437	Site 4: Exterior
Site 5: Floor 4, Unit 441	Site 6: Floor 3, Unit 354
Site 7: Floor 3, Unit 362	Site 8: Floor 3, Unit 347
Site 9: Floor 4, Unit 456	Site 10: Floor 4, Unit 457
Site 11: Floor 4, Unit 464	Site 12: Floor 4, Unit 447
Site 13: Floor 3, Unit 337	Site 14: Floor 3, Unit 338
Site 15: Floor 3, Unit 341	Site 16: Floor 3, Unit 349
Site 17: Floor 3, Unit 371	Site 18: Floor 2, Unit 240
Site 19: Floor 2, Unit 241	Site 20: Floor 2, Unit 247
Site 21: Floor 2, Unit 253	Site 22: Floor 2, Unit 260
Site 23: Floor 3, Unit 333	Site 24: Floor 2, Unit 208
Site 25: Floor 2, Unit 205	Site 26: Floor 1, Unit 101
Site 27: Floor 1, Unit 105	Site 28: Floor 1, Pool Room
Site 29: Floor 1, Exercise Room	Site 30: Floor 1, Laundry Room 1
Site 31: Stairwell 1	Site 32: Floor 1, Unit 114
Site 33: Floor 3, Meeting Room	Site 34: Floor 1, Front Entry Foyer
Site 35: Floor 1, Hall 1	Site 36: Stairwell 2
Site 37: Floor 2, Hall 2	Site 38: Floor 2, Laundry Room 2
Site 39: Floor 3, Laundry Room 3	Site 40: Stairwell 3
Site 41: Stairwell 4	Site 42: Stairwell 5
Site 43: Stairwell 6	Site 44: Floor 3, Hall 3
Site 45: Floor 3, Laundry Room 4	Site 46: Floor 3, Laundry Room 5
Site 47: Floor 4, Laundry Room 6	Site 48: Floor 4, Hall 4

Interior sides of the units are based upon the front entry door. Side A faces the main hallway, with sides B, C and D rotating clockwise from side A. Common areas use the exterior method, where side A faces the main road, and sides B, C, and D rotate clockwise from this point.

The exterior sampling sides are designated below:

Side A:	West, facing parking lot, Winthrop Street and park across street.
Side B:	North, facing a lawn, Hillsdale Avenue and multi-family housing across Hillsdale.
Side C:	East, facing parking lot, Kipling Street, and multi-family housing across street.
Side D:	South, facing lawn and trees, with a wooded area across property line.

Specific building components determined to have a lead concentration above the action level (1.0 mg/cm^2) are listed on the following page:

LOCATION	COMPONENT
Site 18: Floor 2, Unit 240	
Bathroom	Enamel coating on bath tub. *Assume all bath tubs not tested to contain lead coatings.

Also included in Appendix B of this report is a rating of the condition of paint on components (column titled "Condition"). Comments on the condition include:

Intact: good condition; **Fair:** less than 2 square feet of damage to large interior surface, i.e., wall, less than 10 square feet of damage to large exterior surface, i.e., outside walls, or less than 10% damage to small surface areas, i.e., baseboards, trim, etc.; **Poor:** more than 2 square feet of damage on large interior surfaces, more than 10 square feet of damage to large exterior surface areas, or more than 10% damage to small surface areas.

Visual Inspection

MEC conducted an inspection of painted and varnished surfaces on the interior and exterior of the complex.

The results of the visual inspection indicate that the complex is mainly in intact condition. No areas/components were noted to have paint or varnish in fair to poor condition above the action level of 1.0 mg/cm.

Please note, however, the condition report within the XRF table for painted or varnished surfaces found to be fair or poor, that were below the 1.0 mg/cm^2 action level.

Environmental Sampling Plan

Based on the location of lead-based paint, deteriorated lead-based paint, and information gathered during the visual inspection, MEC formulated the following environmental sampling plan to identify other lead hazards on this property. Emphasis is placed on where young children may spend time. Water samples were not collected, as they were not part of the scope of work for this project. A review of the property found no bare soil present on the days of the site investigation.

Samples were collected and delivered to EMSL Laboratory, Carle Place, New York, where they were prepared and analyzed using current appropriate protocols for lead.

Laboratory results for environmental samples may be found in Appendix C.

Analytical results are reported on the following page, for each sample and compared to standard action levels that have been identified for this project.

SAMPLE # DATE/TYPE	LOCATION	RESULT	PROJECT ACTION LEVEL*
Site 1: Floor 1, Unit 106			
626/1104A-W1 1/6/05	Room 1, Front Entry, floor adj. door	<10 μg/ft^2	40 μg/ft^2
626/1104A-W2 1/6/05	Room 1, middle of room, floor	<10 μg/ft^2	40 μg/ft^2
626/1104A-W3 1/6/05	Room 2, middle of room, floor	<10 μg/ft^2	40 μg/ft^2
Site 2: Floor 4, Unit 444			
626/1104A-W4 1/6/05	Room 1, Side A, floor adj. door	<10 μg/ft^2	40 μg/ft^2
626/1104A-W5 1/6/05	Room 2, Side A, floor	<10 μg/ft^2	40 μg/ft^2
626/1104A-W6 1/6/05	Room 3, Side A, floor	<10 μg/ft^2	40 μg/ft^2
626/1104A-W7 1/6/05	Room 4, Side A, floor	<10 μg/ft^2	40 μg/ft^2
626/1104A-W8 1/6/05	Kitchen, middle of room, floor	<10 μg/ft^2	40 μg/ft^2
626/1104A-W9 1/6/05	Blind Field Blank	<10 μg/ft^2	----------
Site 3: Floor 4, Unit 437			
626/1104A-W10 1/11/05	Room 1, Side A, floor adj. front entry door	<10 μg/ft^2	40 μg/ft^2
626/1104A-W11	Room 1, Side C, floor adj.	<10 μg/ft^2	40 μg/ft^2

1/11/05	patio door		
SAMPLE # DATE/TYPE	**LOCATION**	**RESULT**	**PROJECT ACTION LEVEL***
626/1104A-W12 1/11/05	Room 2, Side C, window well	70 μg/ft^2	400 μg/ft^2
626/1104A-W13 1/11/05	Room 2, Side A, floor adj. door	<10 μg/ft^2	40 μg/ft^2
Site 5: Floor 4, Unit 441			
626/1104A-W14 1/11/05	Hall, Side A, floor adj. entry door	<10 μg/ft^2	40 μg/ft^2
626/1104A-W15 1/11/05	Room 1, Side C, floor adj. patio door	<10 μg/ft^2	40 μg/ft^2
626/1104A-W16 1/11/05	Room 2, Side C, interior window stool	<40 μg/ft^2	250 μg/ft^2
626/1104A-W17 1/11/05	Room 2, Side A, floor adj. door	<10 μg/ft^2	40 μg/ft^2
626/1104A-W18 1/11/05	Blind Field Blank	<10 μg/ft^2	----------
Site 6: Floor 3, Unit 354			
626/1104A-W19 1/13/05	Hall, Side A, floor adj. entry door	<10 μg/ft^2	40 μg/ft^2
626/1104A-W20 1/13/05	Room 1, Side C, floor adj. patio door	<10 μg/ft^2	40 μg/ft^2
626/1104A-W21 1/13/05	Room 2, Side C, interior window stool	<40 μg/ft^2	250 μg/ft^2
626/1104A-W22 1/13/05	Room 2, Side A, floor adj. door	<10 μg/ft^2	40 μg/ft^2
Site 7: Floor 3, Unit 362			
626/1104A-W23 1/13/05	Hall, Side A, floor adj. entry door	<10 μg/ft^2	40 μg/ft^2

626/1104A-W24 1/13/05	Room 1, Side C, floor adj. patio door	<10 μg/ft^2	40 μg/ft^2
SAMPLE # DATE/TYPE	**LOCATION**	**RESULT**	**PROJECT ACTION LEVEL***
626/1104A-W25 1/13/05	Room 2, Side C, interior window stool (sill)	<40 μg/ft^2	250 μg/ft^2
626/1104A-W26 1/13/05	Room 2, Side A, floor adj. door	<10 μg/ft^2	40 μg/ft^2
Site 8: Floor 3, Unit 347			
626/1104A-W27 1/13/05	Room 1, Side A, floor adj. front entry door	<10 μg/ft^2	40 μg/ft^2
626/1104A-W28 1/13/05	Room 2, Side C, floor adj. patio doors	<10 μg/ft^2	40 μg/ft^2
626/1104A-W29 1/13/05	Room 3, floor in middle of room	<10 μg/ft^2	40 μg/ft^2
626/1104A-W30 1/13/05	Room 4, floor in middle of room	<10 μg/ft^2	40 μg/ft^2
626/1104A-W31 1/13/05	Room 5, floor in middle of room	<10 μg/ft^2	40 μg/ft^2
626/1104A-W32 1/13/05	Blind Field Blank	<10 μg/ft^2	----------
Site 9: Floor 4, Unit 456			
626/1104A-W33 1/18/05	Hall, Side A, floor adj. front entry door	<10 μg/ft^2	40 μg/ft^2
626/1104A-W34 1/18/05	Room 1, Side C, floor adj. patio door	<10 μg/ft^2	40 μg/ft^2
626/1104A-W35 1/18/05	Room 2, Side C, interior window stool (sill)	<40 μg/ft^2	250 μg/ft^2
626/1104A-W36 1/18/05	Room 2, Side A, floor adj. door	<10 μg/ft^2	40 μg/ft^2

Site 10: Floor 4, Unit 457			
626/1104A-W37 1/18/05	Hall, Side A, floor adj. front entry door	<10 μg/ft^2	40 μg/ft^2
SAMPLE # DATE/TYPE	**LOCATION**	**RESULT**	**PROJECT ACTION LEVEL***
626/1104A-W38 1/18/05	Room 1, Side C, floor adj. patio door	<10 μg/ft^2	40 μg/ft^2
626/1104A-W39 1/18/05	Room 2, Side C, interior window stool (sill)	<40 μg/ft^2	250 μg/ft^2
626/1104A-W40 1/18/05	Room 2, Side A, floor adj. door	<10 μg/ft^2	40 μg/ft^2
Site 11: Floor 4, Unit 464			
626/1104A-W41 1/18/05	Hall, Side A, floor adj. front entry door	<10 μg/ft^2	40 μg/ft^2
626/1104A-W42 1/18/05	Room 1, Side C, floor adj. patio door	<10 μg/ft^2	40 μg/ft^2
626/1104A-W43 1/18/05	Room 2, Side C, interior window stool	<40 μg/ft^2	250 μg/ft^2
626/1104A-W44 1/18/05	Room 2, Side A, floor adj. door	<10 μg/ft^2	40 μg/ft^2
Site 12: Floor 4, Unit 447			
626/1104A-W45 1/18/05	Room 1, Side A, floor adj. front entry door	<10 μg/ft^2	40 μg/ft^2
626/1104A-W46 1/18/05	Room 2, Side C, floor adj. patio door	<10 μg/ft^2	40 μg/ft^2
626/1104A-W47 1/18/05	Room 3, Side D, interior window stool (sill)	<40 μg/ft^2	250 μg/ft^2
626/1104A-W48 1/18/05	Room 3, Side A, floor adj. door	<10 μg/ft^2	40 μg/ft^2
626/1104A-W49	Room 5, Side C, interior	<40 μg/ft^2	250 μg/ft^2

1/18/05	window stool		
626/1104A-W50 1/18/05	Room 5, Side B, floor	<10 μg/ft^2	40 μg/ft^2
SAMPLE # DATE/TYPE	**LOCATION**	**RESULT**	**PROJECT ACTION LEVEL***
626/1104A-W51 1/18/05	Blind Field Blank	<10 μg/ft^2	----------
Site 13: Floor 3, Unit 337			
626/1104A-W52 1/18/05	Hall, Side A, floor adj. front entry door	<10 μg/ft^2	40 μg/ft^2
626/1104A-W53 1/18/05	Room 1, Side C, floor adj. patio door	<10 μg/ft^2	40 μg/ft^2
626/1104A-W54 1/18/05	Kitchen, Side C, floor	<10 μg/ft^2	40 μg/ft^2
626/1104A-W55 1/18/05	Kitchen, Side A, floor	<10 μg/ft^2	40 μg/ft^2
Site 14: Floor 3, Unit 338			
626/1104A-W56 1/18/05	Room 1, Side A, floor adj. door	<10 μg/ft^2	40 μg/ft^2
626/1104A-W57 1/18/05	Room 1, Side C, floor adj. patio doors	<10 μg/ft^2	40 μg/ft^2
626/1104A-W58 1/18/05	Room 2, Side C, interior window stool (sill)	<40 μg/ft^2	250 μg/ft^2
626/1104A-W59 1/18/05	Room 2, Side A, floor adj. door	<10 μg/ft^2	40 μg/ft^2
Site 15: Floor 3, Unit 341			
626/1104A-W60 1/19/05	Hall, Side A, floor adj. front entry door	<10 μg/ft^2	40 μg/ft^2
626/1104A-W61 1/19/05	Room 1, Side C, floor adj. patio door	<10 μg/ft^2	40 μg/ft^2

626/1104A-W62 1/19/05	Room 2, Side C, interior window stool (sill)	<40 μg/ft^2	250 μg/ft^2
626/1104A-W63 1/19/05	Room 2, Side A, floor adj. door	<10 μg/ft^2	40 μg/ft^2
SAMPLE # DATE/TYPE	**LOCATION**	**RESULT**	**PROJECT ACTION LEVEL***
Site 16: Floor 3, Unit 349			
626/1104A-W64 1/19/05	Room 1, Side A, floor adj. front entry door	<10 μg/ft^2	40 μg/ft^2
626/1104A-W65 1/19/05	Room 2, Side C, floor adj. patio door	<10 μg/ft^2	40 μg/ft^2
626/1104A-W66 1/19/05	Room 4, Side C, interior window stool (sill)	<40 μg/ft^2	250 μg/ft^2
626/1104A-W67 1/19/05	Room 4, Side A, floor adj. door	<10 μg/ft^2	40 μg/ft^2
626/1104A-W68 1/19/05	Bath, Side B, floor	<10 μg/ft^2	40 μg/ft^2
Site 17: Floor 3, Unit 371			
626/1104A-W69 1/19/05	Room 1, Side A, floor adj. front entry door	<10 μg/ft^2	40 μg/ft^2
626/1104A-W70 1/19/05	Room 2, Side C, floor adj. patio door	<10 μg/ft^2	40 μg/ft^2
626/1104A-W71 1/19/05	Room 4, Side C, interior window stool (sill)	<40 μg/ft^2	250 μg/ft^2
626/1104A-W72 1/19/05	Room 4, Side A, floor adj. door	<10 μg/ft^2	40 μg/ft^2
626/1104A-W73 1/19/05	Kitchen, Side D, floor	<10 μg/ft^2	40 μg/ft^2
Site 18: Floor 2, Unit 240			
626/1104A-W74	Room 1, Side A, floor adj.	<10 μg/ft^2	40 μg/ft^2

1/19/05	front entry door		
626/1104A-W75 1/19/05	Room 1, Side C, floor adj. patio door	<10 μg/ft^2	40 μg/ft^2
626/1104A-W76 1/19/05	Room 2, Side C, interior window stool (sill)	<40 μg/ft^2	250 μg/ft^2
SAMPLE # DATE/TYPE	**LOCATION**	**RESULT**	**PROJECT ACTION LEVEL***
626/1104A-W77 1/19/05	Room 2, Side A, floor adj. door	<10 μg/ft^2	40 μg/ft^2
Site 19: Floor 2, Unit 241			
626/1104A-W78 1/19/05	Hall, Side A, floor adj. front entry door	<10 μg/ft^2	40 μg/ft^2
626/1104A-W79 1/19/05	Room 1, Side C, floor adj. patio door	<10 μg/ft^2	40 μg/ft^2
626/1104A-W80 1/19/05	Room 2, Side C, interior window stool (sill)	<40 μg/ft^2	250 μg/ft^2
626/1104A-W81 1/19/05	Room 2, Side A, floor adj. door	<10 μg/ft^2	40 μg/ft^2
626/1104A-W82 1/19/05	Blind Field Blank	<10 μg/ft^2	40 μg/ft^2
Site 20: Floor 2, Unit 247			
626/1104A-W83 1/24/05	Room 1, Side A, floor adj. front entry door	<10 μg/ft^2	40 μg/ft^2
626/1104A-W84 1/24/05	Room 2, Side C, floor adj. patio door	<10 μg/ft^2	40 μg/ft^2
626/1104A-W85 1/24/05	Room 3, floor in middle of room	<10 μg/ft^2	40 μg/ft^2
626/1104A-W86 1/24/05	Room 4, floor in middle of room	<10 μg/ft^2	40 μg/ft^2
626/1104A-W87	Room 5, floor in middle of	<10 μg/ft^2	40 μg/ft^2

1/24/05	room		
Site 21: Floor 2, Unit 253			
626/1104A-W88 1/24/05	Hall, Side A, floor adj. front entry door	<10 μg/ft^2	40 μg/ft^2
626/1104A-W89 1/24/05	Room 1, Side C, floor adj. patio door	<10 μg/ft^2	40 μg/ft^2
SAMPLE # DATE/TYPE	**LOCATION**	**RESULT**	**PROJECT ACTION LEVEL***
626/1104A-W90 1/24/05	Room 2, Side C, interior window stool (sill)	<40 μg/ft^2	250 μg/ft^2
626/1104A-W91 1/24/05	Room 2, Side A, floor adj. door	<10 μg/ft^2	40 μg/ft^2
Site 22: Floor 2, Unit 260			
626/1104A-W92 1/24/05	Hall, Side A, floor adj. front entry door	<10 μg/ft^2	40 μg/ft^2
626/1104A-W93 1/24/05	Room 1, Side C, floor adj. patio door	<10 μg/ft^2	40 μg/ft^2
626/1104A-W94 1/24/05	Room 2, Side C, interior window stool (sill)	<40 μg/ft^2	250 μg/ft^2
626/1104A-W95 1/24/05	Room 2, Side A, floor adj. entry door	<10 μg/ft^2	40 μg/ft^2
626/1104A-W96 1/24/05	Blind Field Blank	<10 μg/ft^2	----------
Site 23: Floor 3, Unit 333			
626/1104A-W97 1/25/05	Room 1, Side A, floor adj. front entry door	<10 μg/ft^2	40 μg/ft^2
626/1104A-W98 1/25/05	Room 2, Side C, interior window stool	<40 μg/ft^2	250 μg/ft^2
626/1104A-W99 1/25/05	Room 2, Side A, floor adj. entry door	<10 μg/ft^2	40 μg/ft^2

626/1104A-W100 1/25/05	Room 4, Side C, interior window stool (sill)	<40 μg/ft^2	250 μg/ft^2
626/1104A-W101 1/25/05	Room 4, Side A, floor adj. door	<10 μg/ft^2	40 μg/ft^2
Site 24: Floor 2, Unit 208			
626/1104A-W102 1/25/05	Room 1, Side A, floor adj. front entry door	<10 μg/ft^2	40 μg/ft^2
SAMPLE # DATE/TYPE	**LOCATION**	**RESULT**	**PROJECT ACTION LEVEL***
626/1104A-W103 1/25/05	Room 2, Side C, interior window stool (sill)	<40 μg/ft^2	250 μg/ft^2
626/1104A-W104 1/25/05	Room 2, Side A, floor adj. door	<10 μg/ft^2	40 μg/ft^2
626/1104A-W105 1/25/05	Room 3, Side C, interior window stool (sill)	<40 μg/ft^2	250 μg/ft^2
626/1104A-W106 1/25/05	Room 3, Side D, floor adj. entry door	<10 μg/ft^2	40 μg/ft^2
Site 25: Floor 2, Unit 205			
626/1104A-W107 1/25/05	Room 1, Side A, floor adj. front entry door	<10 μg/ft^2	40 μg/ft^2
626/1104A-W108 1/25/05	Room 3, Side C, interior window stool (sill)	<40 μg/ft^2	250 μg/ft^2
626/1104A-W109 1/25/05	Room 3, Side B, floor adj. door	<10 μg/ft^2	40 μg/ft^2
626/1104A-W110 1/25/05	Room 4, Side C, interior window stool (sill)	<40 μg/ft^2	250 μg/ft^2
626/1104A-W111 1/25/05	Room 4, Side A, floor	<10 μg/ft^2	40 μg/ft^2
626/1104A-W112 1/25/05	Blind Field Blank	<10 μg/ft^2	----------

Site 26: Floor 1, Unit 101			
626/1104A-W113 1/25/05	Room 1, Side A, floor adj. front entry door	<10 μg/ft^2	40 μg/ft^2
626/1104A-W114 1/25/05	Room 2, Side C, interior window stool	<40 μg/ft^2	250 μg/ft^2
626/1104A-W115 1/25/05	Room 2, Side B, floor adj. door	<10 μg/ft^2	40 μg/ft^2
SAMPLE # DATE/TYPE	**LOCATION**	**RESULT**	**PROJECT ACTION LEVEL***
626/1104A-W116 1/25/05	Room 3, Side C, interior window stool	<40 μg/ft^2	250 μg/ft^2
626/1104A-W117 1/25/05	Room 3, Side A, floor adj. door	<10 μg/ft^2	40 μg/ft^2
Site 27: Floor 1, Unit 105			
626/1104A-W118 1/25/05	Room 1, Side A, floor adj. front entry door	<10 μg/ft^2	40 μg/ft^2
626/1104A-W119 1/25/05	Room 3, Side C, interior window stool (sill)	<40 μg/ft^2	250 μg/ft^2
626/1104A-W120 1/25/05	Room 3, Side B, floor adj. door	<10 μg/ft^2	40 μg/ft^2
626/1104A-W121 1/25/05	Room 4, Side C, interior window stool (sill)	<40 μg/ft^2	250 μg/ft^2
626/1104A-W122 1/25/05	Room 4, Side A, floor	<10 μg/ft^2	40 μg/ft^2
Site 28: Pool Room			
626/1104A-W123 1/27/05	Floor, Side A, adj. entry door	<10 μg/ft^2	40 μg/ft^2
Site 29: Exercise Room			
626/1104A-W124 1/27/05	Floor, middle of room	<10 μg/ft^2	40 μg/ft^2

Site 30: Floor 1, Laundry Room 1			
626/1104A-W125 1/27/05	Room 1, floor in middle of room	<10 μg/ft^2	40 μg/ft^2
Site 31: Stairwell 1			
626/1104A-W126 1/27/05	Floor 3, Side A, top floor landing	<10 μg/ft^2	40 μg/ft^2
SAMPLE # DATE/TYPE	**LOCATION**	**RESULT**	**PROJECT ACTION LEVEL***
Site 32: Floor 1, Unit 114			
626/1104A-W127 1/27/05	Room 1, Side A, floor adj. entry door	<10 μg/ft^2	40 μg/ft^2
626/1104A-W128 1/27/05	Room 2, Side C, interior window stool (sill)	<40 μg/ft^2	250 μg/ft^2
626/1104A-W129 1/27/05	Room 2, Side A, floor adj. door	<10 μg/ft^2	40 μg/ft^2
626/1104A-W130 1/27/05	Room 3, Side C, interior window stool (sill)	<40 μg/ft^2	250 μg/ft^2
626/1104A-W131 1/27/05	Room 3, Side A, floor adj. door	<10 μg/ft^2	40 μg/ft^2
626/1104A-W132 1/27/05	Blind Field Blank	<10 μg/ft^2	----------
Site 33: Floor 3, Meeting Room			
626/1104A-W133 1/27/05	Floor in middle of room	<10 μg/ft^2	40 μg/ft^2
Site 34: Floor 1, Front Entry Foyer			
626/1104A-W1 4/22/05	Floor 1, Side A, floor adj. front entry	<10 μg/ft^2	40 μg/ft^2
Site 35: Floor 1, Hall 1			
626/1104A-W2	Side D, floor adj. elevators	<10 μg/ft^2	40 μg/ft^2

4/22/05			
626/1104A-W3 4/22/05	Side C, floor adj. Stair 2	<10 μg/ft^2	40 μg/ft^2
626/1104A-W4 4/22/05	Side C, floor adj. Stair 3	<10 μg/ft^2	40 μg/ft^2
Site 38: Floor 2, Laundry Room 2			
626/1104A-W5 4/22/05	Floor in middle of room.	<10 μg/ft^2	40 μg/ft^2
SAMPLE # DATE/TYPE	**LOCATION**	**RESULT**	**PROJECT ACTION LEVEL***
Site 39: Floor 3, Laundry Room 3			
626/1104A-W6 4/22/05	Floor in middle of room.	<10 μg/ft^2	40 μg/ft^2
Site 40: Stairwell 3			
626/1104A-W7 4/22/05	Floor 2, Side A, floor	<10 μg/ft^2	40 μg/ft^2
Site 41: Stairwell 4			
626/1104A-W8 4/22/05	Floor 3, Landing floor before Hall	<10 μg/ft^2	40 μg/ft^2
Site 44: Floor 3, Hall 3			
626/1104A-W9 4/22/05	Side A, floor and Elevator (Winthrop Side)	<10 μg/ft^2	40 μg/ft^2
626/1104A-W10 4/22/05	Floor 3, Hall 3, Side C, floor adj. entry from Kipling Parking Lot	<10 μg/ft^2	40 μg/ft^2
Site: 45: Floor 3, Laundry Room 4			
626/1104A-W11 4/22/05	Floor in middle of room.	<10 μg/ft^2	40 μg/ft^2
Site 46: Floor 3, Laundry Room 5			

626/1104A-W12 4/22/05	Floor in middle of room.	<10 μg/ft^2	40 μg/ft^2
Site 42: Stairwell 5			
626/1104A-W13 4/22/05	Floor 3, Landing floor	<10 μg/ft^2	40 μg/ft^2
Site 43: Stairwell 6			
626/1104A-W14 4/22/05	Floor 4, Landing floor	<10 μg/ft^2	40 μg/ft^2
SAMPLE # DATE/TYPE	**LOCATION**	**RESULT**	**PROJECT ACTION LEVEL***
Site 47: Floor 4, Laundry Room 6			
626/1104A-W15 4/22/05	Floor 4, Laundry Room 6, floor in middle of room	<10 μg/ft^2	40 μg/ft^2
Site 48: Floor 4, Hall 4			
626/1104A-W16 4/22/05	Side C, floor adj. Stair 4 door	<10 μg/ft^2	40 μg/ft^2
626/1104A-W17 4/22/05	Floor between Units 442 and 443	<10 μg/ft^2	40 μg/ft^2
626/1104A-W18 4/22/05	Blind Field Blank	<10 μg/ft^2	----------

* Unit Abbreviations: μg/ft^2 - micrograms per square foot

Dust wipe were collected from the complex, however, water and sodium rhodizonate swabs were not collected as part of this project. No bare soil was visible on the property the days of the site investigation.

DISCUSSION

The mere presence of lead does not constitute a lead hazard. However, lead was found in an intact state within bathroom bathtub in Unit 240. It should be assumed that all original vintage metal bathtubs that were not sampled, contain lead coatings.

No bare soil was visible on the property the days of the site investigation.

Lead dust sampling results found no samples that exceeded the HUD, EPA, or MDH action levels in the areas tested.

RECOMMENDATIONS

The single component found to contain lead was in intact condition, and only requires ongoing maintenance and monitoring. Other options are as follows:

Site 18, Unit 240:

- Enamel coating on bath tub (*Assume all original vintage bath tubs in the complex, not tested, to contain lead coatings): Currently in intact condition. At a minimum, include into the ongoing maintenance and monitoring plan for the complex. Do not used harsh abrasives or cleaning products to clean bathtub surfaces, as this damages the surface coating which may allow lead to leach into the bath water where hand-to-mouth activities of young children may provide an avenue for possible lead poisoning. The bathtub(s) may be removed and replaced with new units, or have a tub insert installed, as options for remediation.

ESTIMATED COSTS:

- Work site preparation for interior, approximately $75.00 to $250.00 per room.
- Work area cleaning: $0.15 to $0.35 per square foot.
- Bath tub removal and replacement: $700.00 to $1,300.00.
- Bath tub enclosure: $250.00 to $500.00.

The preceding lead reduction recommendations include different ways to treat each lead hazard that was identified by the risk assessment/inspection. The most effective treatments are considered abatement and require little or no ongoing maintenance to preserve a lead safe environment. The less effective treatments are called interim controls and these treatments require an increased amount of ongoing maintenance to preserve a lead safe environment.

If no lead dust, soil, or lead-based paint is found, then no monitoring is required.

If no hazards are found, but lead-based paint is found, then reevaluation should occur every three years, and an owner's visual survey should occur annually.

If lead dust, soil, or lead-based paint hazards are found to be present, choosing the option with removal of all lead-based paint will result in no monitoring requirements. If abatement options are chosen that include enclosure, then no re-evaluation is required, but the owner should conduct visual surveys every year to ensure the enclosure has not failed. If the interim control options (stabilize and paint) are chosen, then re-evaluation should occur after the first year and then every two years after that. Visual surveys by the owner should occur annually.

If lead dust levels are found to be more than ten times the standard levels, then reevaluation after interim control measures should occur six months after the hazard reduction.

In general, all painted surfaces should be monitored. A negative result does not necessarily indicate that no lead is present in that surface, but rather indicates that any lead present in that surface does not rise above the 1.0 mg/cm^2 threshold in the areas tested. Therefore, all painted surfaces should be maintained in accordance with the Minnesota Department of Health standards.

If work is going to be performed on these surfaces, individuals and/or contractors should be informed of the results of testing. At a minimum, the person(s) performing the work should follow the requirements of the Occupational Safety and Health Administration (OSHA) Standard 29 CFR 1926.62, Lead in the Construction Industry.

For the protection of the occupants and workers, and if federal funds are involved, you should use qualified firms who are knowledgeable about the hazards associated with lead and are certified/licensed to perform the work.

Please maintain a copy of the lead inspection report for your records and provide a copy of the report to any contractors that may be involved in any future renovations or remodeling projects.

A copy of this lead inspection/risk assessment summary must be provided to purchasers or lessees (tenants) of this property under Federal Law (24 CFR Part 35 and 40 CFR part 745) before they become obligated under a lease or sales contract. The complete report must also be provided to new purchasers and it must be made available to new tenants. Landlords (lessors) and sellers are also required to distribute an educational pamphlet approved by the U.S. Environmental Protection Agency and include standard warning language in their leases or sales contracts to ensure that parents have the information they need to protect their children from lead-based paint hazards.

It has been a pleasure to provide this service to you. Please contact me if you have questions relating to any aspect of this work.

Respectfully submitted,

Andrew Myers
Environmental Project Manager

APPENDIX A

MEC CREDENTIALS

APPENDIX B

XRF TEST RESULTS
SAMPLING MAPS
DATA SHEETS
CALIBRATION DATA

Description of Column Titles

Site: The sequential number of the site (homes or buildings) inspected on a particular day.

No: The sequential XRF sample number for a given site.

XL No/Map: The sample number recorded on the maps of a particular site.

Date: Date that the XRF sample was analyzed.

Time: Time of XRF sample analysis.

Floor: The sample location floor level (0 = basement, 1 = first floor, 2 = second floor).

Room: The specific location where the sample was analyzed on the site. Calibrate is also recorded in this column when appropriate.

Side: Side of the room based on sampling methodology as described earlier in this report. The only four sides that can be designated are **A, B, C,** and **D.**

Structure: This refers to the general building component that the test was performed on. It may also include modifications such as: upper, lower, exterior, interior, right, and left.

Feature: Specifies additional information about a structure.

Substrate: Refers to the material that the structure was made of, i.e., wood, concrete, drywall, etc.

Condition: Describes whether the surface being tested is **Intact:** good condition; **Fair:** less than 2 square feet of damage to large interior surface, i.e., wall, less than 10 square feet of damage to large exterior surface, i.e., outside walls, or less than 10% damage to small surface areas, i.e., baseboards, trim, etc.; **Poor:** more than 2 square feet of damage on large interior surfaces, more than 10 square feet of damage to large exterior surface areas, or more than 10% damage to small surface areas.

Color: Color of surface tested.

Result: The lead concentration in mg/cm^2 as determined with L-shell and K-shell X-ray data. Results: POS - above action level, NEG - below action level.

PbL(mg/cm^2): The lead concentration as determined with L-shell X-ray data.

PbK: The lead concentration in mg/cm^2 on the K-shell X-ray data spectrum.

PbC: The combined lead concentration in mg/cm^2 of the low end of the L-shell and K-shell X-ray data spectrum.

Duration: The length of the XRF sample analysis in seconds.

Depth: This is the index that is a qualitative indication of the depth of the lead in paint. As the number approaches 1, the lead is concentrated close to the top layers of paint. The largest number available for depth index is 10. The greater the number, the more likely interfering elements may have been detected.

Inspector: When multiple inspectors are used, this number indicates who sampled at the time indicated.

Note: This refers to any notes that were collected during the analysis of the particular sample. Then can be found on the field data sheet titled "Lead-Based Paint Inspection Data Page."

SAMPLING METHODOLOGY

Buildings were systematically inspected for lead-based paints. The **A** side of the building is the side facing the street. Starting from the **A** side, the other sides are lettered consecutively (**B, C, D**), going clockwise around the building.

Some rooms that are unique in the building are named on the inspection report. These would include things like pantry, kitchen, halls, bathrooms, and staircases. If there is more than one of a certain type of named room, then they are numbered (e.g., staircases to basements are numbered staircase 1, while staircases to the second floor are labeled staircase 2). Room numbering starts in the **A-D** corner of the building and continues clockwise from that point.

Within each room of the building, each of the sides of the room are named. The naming of walls in a room, for instance, follows the same pattern as that used on the exterior of the building, namely, the street side of each room is labeled **A,** and then clockwise from that wall, walls are labeled **B, C, D**.

APPENDIX C

LABORATORY ANALYSIS
CHAIN-OF-CUSTODY