

**U.S. GENERAL SERVICES ADMINISTRATION  
REGION 8 PUBLIC BUILDINGS SERVICE  
LEAD CONTAINING PAINT PRE-ALTERATION ASSESSMENT  
STATEMENT OF WORK**

In order to comply with 29 CFR 1910.1025, 29 CFR 1926.62, 41 CFR 102-80.30 and Section 1.7.4.2 of the GSA PBS-P100, a pre-alteration lead containing paint (LCP) assessment will be required before any demolition or renovation activity where LCP coating and surfaces may be sanded, burned, welded, scraped or otherwise impacted in the project area. **Under the OSHA Lead in Construction Standard, all detectable levels of lead in paints and coatings are regulated, not just the EPA/HUD definition of lead based paint (LBP) of 0.5% by weight. Therefore, all paints/coatings with any lead content will be considered LCP.** All coatings and paints in buildings built prior 1978 are suspect LCP and will be assumed as such unless assessed and sampled. GSA shall provide any relevant renovation project scope information. The following shall be adhered to:

- A. Destructive Testing and Patching. Destructive chip sampling of materials that will be disturbed as a result of the proposed project is authorized. Sample points shall be temporarily patched or covered with tape, etc.
- B. Regulatory and Policy Requirements. The assessment shall be conducted in pursuant with applicable federal, state, and local lead regulations as well as GSA policy including but not limited to:
  - 1. EPA Lead Renovation, Repair, and Painting Rule (RRP) as well as associated implemented regulations under the Toxic Substance Control Act (TSCA) regulations codified at 40 CFR 745<sup>‡</sup>
  - 2. U.S. Department of Housing and Urban Development (HUD) Lead-Based Paint Poisoning Prevention in Certain Residential Structures - 24 CFR 35<sup>‡</sup>
  - 3. HUD *Guidelines for the Evaluation and Control of Lead-Based Paint Hazards in Housing*. Second Edition, July 2012<sup>‡</sup>
  - 4. Occupational Safety and Health Administration (OSHA) General Industry Toxic and Hazardous Substances, Lead Standard - 29 CFR 1910.1025
  - 5. OSHA Lead in Construction Standard - 29 CFR 1926.62
  - 6. Federal Management Regulation, Real Property, Safety and Environmental Management – 41 CFR 102-80.30
  - 7. GSA PBS-P100 Facilities Standards for the Public Building Service. 2017
- C. Contractor Qualifications. All sampling and assessment activities shall be performed by individuals with appropriate levels of OSHA lead awareness and certified/licensed through the EPA RRP Rule or through the State of Colorado as lead inspectors or risk assessors. If an X-ray fluorescence (XRF) instrument is used, all inspectors/risk assessors must possess current training, certification and licensing in the use of the XRF equipment under appropriate federal, state or local authority.

‡ Although EPA/HUD lead based paint regulations and guidance do not currently apply to non-child occupied commercial and public buildings, GSA does incorporate relevant substantive requirements of these standards to ensure the safety and health of tenants and employees.

- D. Assessment and Sampling Protocols. Contractor shall delineate and group painted or coated surfaces into homogenous areas by component type, substrate, visible color, and texture. All accessible areas within the scope of the renovation project shall be inspected and assessed. The assessment and sampling of suspect LCP via XRF screening and paint chip analysis shall be conducted in accordance with 40 CFR 745.227(b), 40 CFR 745.227(f), and Chapter 7 of the HUD *Guidelines for the Evaluation and Control of Lead-Based Paint Hazards in Housing*.

I X-Ray Fluorescence (XRF) Screening

- a If XRF screening is used, only XRF devices with a posted and current Performance Characteristic Sheet (PCS) with EPA and HUD shall be used.
- b An appropriate number of calibration checks shall be taken, including a minimum of three checks prior to the beginning of the inspection, at least every four hours, and after inspection work has been completed, or in accordance with manufacturer's instructions, whichever is most frequent.
- c XRF screening methodology of suspect LCP shall be in accordance with Chapter 7 of the HUD *Guidelines for the Evaluation and Control of Lead-Based Paint Hazards in Housing*. Contractor shall take a minimum of one individual XRF reading on each testing combination in each room equivalent. For walls, contractor shall take at least four readings (one reading per wall) in each room equivalent.
- d For any irregular painted/coated surfaces or any other circumstance in which an accurate XRF reading is not feasible, the Contractor shall collect a representative paint chip sample in accordance with Section D.II of this SOW.
- e For any XRF result of less than 1.0 mg/m<sup>2</sup> or within the XRF instrument's inclusive or negative range, the Contractor shall collect a representative confirmatory paint chip sample in accordance with Section D.II of this SOW.

II Paint Chip Assessment

- a A minimum of one representative paint chip sample of each homogenous area delineated and grouped by component type, substrate, visible color, and texture that may be impacted by renovation project shall be collected in accordance with 40 CFR 745.227(b), 40 CFR 745.227(f), and Chapter 7 of the HUD *Guidelines for the Evaluation and Control of Lead-Based Paint Hazards in Housing*. NOTE: If XRF is utilized to screen positive results in accordance with Section I.D, then only representative confirmatory paint chip samples of XRF readings less than 1.0 mg/m<sup>2</sup> or otherwise in the inclusive or negative range of the instrument are required.
- b Lead chip samples shall be submitted under chain-of-custody protocols to an accredited analytical laboratory for flame atomic absorption spectroscopy (FAAS) analysis via EPA Method SW 846 3050B/7000B.
- c All lead paint chip samples shall be analyzed by an analytical laboratory accredited by the EPA National Lead Laboratory Accreditation Program (NLLAP) or AIHA Environmental Lead Laboratory Accreditation Program (ELLAP), and participating in the AIHA Environmental Lead Proficiency Analytical Testing (ELPAT).
- d Lead paint chip results shall be reported as percent by weight.

- E. Deliverable Requirements. Contractor shall provide a written report for GSA's review and comment documenting the inspection and assessment. The deliverable shall include the following at a minimum:
- I The name and address of the building, structure of facility that was inspected. If less than the entire building, structure, or facility was inspected, the exact location of the area or component(s) inspected shall be listed.
  - II The lead inspector's or risk assessor's name, signature, contact information, individual certification number.
  - III The date(s) the inspection/assessment was performed.
  - IV General description of building and its physical components, dates of construction and any known renovations, description of mechanical systems such as HVAC and plumbing systems. Description of area to be affected by the planned renovation activity.
  - V Description of each assessment and testing method, device, or sampling procedure utilized for paint analysis, including quality control data, and if used, the serial number of any XRF device used.
  - VI Specific locations of each painted or coated component tested for the presence of lead-containing paint.
  - VII Summary of findings and table including material description / HA / location in building / sample numbers / lead concentration / estimated quantity / material condition-assessment.
  - VIII Summary of determined or assumed LCP materials that would be disturbed by proposed project activities and recommendations.
  - IX Figures
    - a Site location figure
    - b Sample location figure(s)
    - c Extent of each HA determined or assumed to be LCP
  - X Photographic log with representative photos of each HA determined or assumed to be LCP
  - XI Field notes
  - XII Inspector's / Risk Assessor's credentials and certifications including XRF training and certification, as applicable
  - XIII COC / laboratory data packages / lab accreditations, as applicable
  - XIV XRF Performance Characteristic Sheet, as applicable
  - XV XRF sample data output, as applicable