

Battelle
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505 King Avenue
Columbus, Ohio 43201-2693
(614) 424-6424 Fax (614) 424-5263

October 2, 2006

Mr. John Schwemberger
Program Assessment & Outreach Branch (7404)
OPPT, Room E827
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue NW (Mail Code 7404T)
Washington, D.C. 20460

Dear John:

Contract No. EP-W-04-021
Work Assignment 2-10
Amendments to Full Study QAPP

Enclosed is a report detailing additional amendments required to the Full Study Quality Assurance Project Plan (QAPP) for Work Assignment 2-10 titled "Quality Assurance Project Plan for Characterization of Dust Lead Levels After Renovation, Repair, and Painting." Also included is a revised signature page. If the appropriate EPA staff members approve the QAPP amendments and re-sign the signature page, Battelle will proceed with implementation of the protocols specified.

If you have any technical questions about the QAPP amendments, please contact me at 614/424-5365.

Sincerely,



Tim Pivetz
Associate Department Manager
Statistics and Information Analysis

TRP:cr

Enclosure

cc: Mr. Samuel Brown, EPA Deputy WAM

QUALITY ASSURANCE PROJECT PLAN FOR
CHARACTERIZATION OF DUST LEAD LEVELS AFTER RENOVATION, REPAIR, AND
PAINTING ACTIVITIES

Version #1 With Amendments

October 2, 2006

Approval for Battelle:

Timothy R. Pivetz 10/2/06
Principal Investigator Date
Tim Pivetz

Zachary Willenberg 10-2-06
Quality Assurance Manager Date
Zachary Willenberg

Bruce Buxton 10/2/06
Project Manager Date
Bruce Buxton

Thomas Kelly 10/2/06
Field Operations Coordinator Date
Ian MacGregor

Approval for U.S. Environmental Protection Agency:

Ronald J. Wooten 10/04/06
EPA Project Officer Date
Sineta Wooten

Barbara Leczynski 10/4/06
OPPT QA Manager Date
Barbara Leczynski

John Schwemberger 10/3/06
EPA WAM Date
John Schwemberger

Samuel J. Brown 10/3/06
EPA Deputy WAM Date
Samuel Brown

QAPP AMENDMENTS

PROJECT NUMBER: Work Assignment 2-10

QAPP TITLE/VERSION NO.: Characterization of Dust Lead Levels After Renovation, Repair, and Painting, Version #1

AMENDMENT NUMBER: 2

EFFECTIVE DATE: October 2, 2006

Section to be Changed/Revised	Change/Revision	Reason for Change/Revision
<p align="center">2.1.5.1.3 Clean a unit to acceptable clearance levels</p>	<p>Sentence stating “If lead is no more than the reporting limit of the lab, or 25% of the levels of 40 µg/ft² on floors and 250 µg/ft² on window sills, whichever is higher, declare the room clean” will be changed to “If lead is below the levels of 40 µg/ft² on floors and 250 µg/ft² on window sills, declare the room clean.”</p>	<p>Raises standard for declaring a room clean based on initial experience not reaching the 25% threshold. This is a more realistic goal that still meets HUD standards.</p>
<p align="center">2.1.5.1.13 Perform post-experiment full study area cleaning and sampling</p>	<p>Change the language discussing acceptable clearance levels to state “If all samples are below the clearance levels of 40 µg/ft² on floors and 250 µg/ft² on window sills, the property is ready to be reused for the study. If one or more samples achieve dust lead levels over the clearance levels, the area that the sample was taken from will undergo recleaning.”</p>	<p>Raises standard for declaring a room clean based on initial experience not reaching the 25% threshold. This is a more realistic goal that still meets HUD standards.</p>
<p align="center">2.1.5.2.1 Pre-experiment sampling</p>	<p>Replace sentence stating “If the surface is man-made, dust-wipe samples will replace these pre-work soil samples” with “If it is impossible to collect soil samples for any reason such as presence of man-made surfaces, no soil samples or other type of replacement samples will be collected.”</p>	<p>Some building exteriors will not provide sufficient amounts of soil for three soil samples. When there are man-made surfaces, replacing soil samples with dust-wipe samples would not provide comparable data.</p>

Section to be Changed/Revised	Change/Revision	Reason for Change/Revision
<p>2.1.5.2.6 Post-experiment sampling</p>	<p>Replace sentence stating “If the surface is man-made, dust-wipe samples will replace these pre-work soil samples” with “If it is impossible to collect soil samples for any reason such as presence of man-made surfaces, no soil samples or other type of replacement samples will be collected.”</p>	<p>Some building exteriors will not provide sufficient amounts of soil for three soil samples. When there are man-made surfaces, replacing soil samples with dust-wipe samples would not provide comparable data.</p>
<p>2.1.5.1.4 Set up the experiment (including work area containment)</p>	<p>Add sentence stating “If no window sills are available for sampling in any of the three study rooms, technicians will set up a dust collection tray on a small table or folding chair. Technicians will separate the tray into four areas using masking tape to mark sampling areas.”</p>	<p>Some study rooms may not contain windows or may contain windows whose sills are unusable for some reason.</p>
<p>2.2.2 Dust wipe sampling</p>	<p>Add sentence stating “In cases where no window sills are available for sampling, technicians will separate the 1 ft² dust collection trays into four approximately 6” x 6” zones and obtain dust wipes from randomly selected zones at the appropriate sampling stages.”</p>	<p>Some study rooms may not contain windows or may contain windows whose sills are unusable for some reason.</p>

ORIGINATED BY:

Timothy R. Pwety
Battelle Task Order Leader

10/2/2006
DATE

APPROVED BY:

Bob Boyer
Battelle Project Manager

10/2/2006
DATE

Jack Willaby
Quality Assurance Manager

10-2-06
DATE