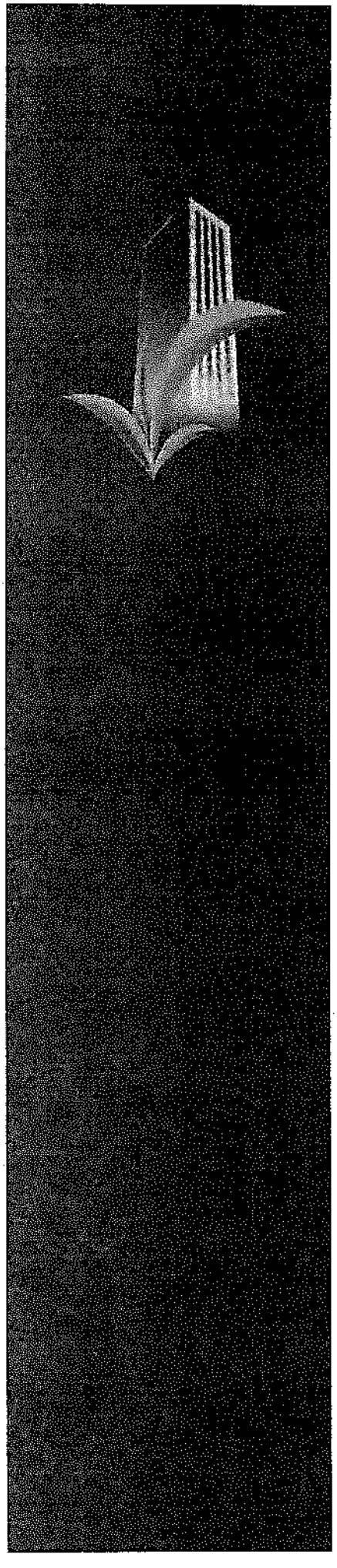


Lead-Based Paint Inspection Report

Project:

Buildings 23 & 23A Located at
Camp Santiago Joint Training Center,
Salinas, Puerto Rico

Client:
PRANG

ZEM-25486
September 2025

Prepared By:

Zimmetry Environmental Management, Corp.
www.zimmetry.com
info@zimmetry.com

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Section 1: Executive Summary

1.1 Introduction

A Lead-Based Paint inspection was conducted on September 5, 2025, at Buildings 23 & 23A located at Camp Santiago Joint Training Center, in the municipality of Salinas, Puerto Rico. The lead-based paint inspection was performed to identify paint that contains lead above allowable levels and to assist with compliance with local, state, and federal regulations.

1.2 Summary of Property Evaluation

The inspection consisted of the evaluation of the interior and exterior areas of the buildings mentioned above. **The inspection determined that lead-based paint was present in selective components and surfaces throughout the building (Bldg. 23) on the inspection date.** Table 1-1 identifies the components positive for lead. Table 2-1 identifies lead-based paint as defined by the U.S. Environmental Protection Agency (EPA) and the Department of Natural and Environmental Resources (DRNA) of Puerto Rico. For specific locations and additional details on the lead location- reference Sections 2 and 3.

Inspected Sites	LBP Result
Building 23	***Positive***
Building 23A	***Negative***

1.3 Property Locations of Building Components with Lead-Based Paint

Table 1-1 summarizes the site components and surfaces coated with lead-based paint. Additional details identifying positive lead-based paint findings within specific areas and on surfaces are provided in Section 2: Lead-Based Paint Inspection Report. The "substrate" is the building component material directly beneath the painted surface. Photographic documentation is for reference purposes and doesn't necessarily include all the surfaces with lead-based paint and/or components containing lead. The quantification of positive materials presented in this table is only an estimate. If an abatement of the materials will be conducted, the Contractors shall estimate the amount of materials to be abated.

If homogeneous materials not accounted for are identified in areas not described in this report or inaccessible areas described in Section 2.3.3, they shall be managed as containing lead. If suspected components that could contain lead are encountered underneath currently installed tiles or other construction material, they shall be managed as containing lead until the appropriate test is performed. Refer to Appendix E: Location of Positive Materials for specific locations.

Table 1-1: Summary of Components Containing Lead of Building 23

Area	Component	Color	Substrate	Approximate Amount
1-1, 1-2	Round Column	White / Cream	Metal	11 Units
	Floor Lines	Yellow	Concrete	973 Ln Ft
1-3	Floor Lines	Yellow	Concrete	155 Ln Ft
	Ramp			
Exterior Side A	Loading Door Line	Yellow	Concrete	192 Ln Ft
	Curb			
	Loading Base	Yellow	Metal	12 Units
	Stringer	Yellow / Cream	Concrete	24 Ft^2
	Riser	Yellow	Concrete	42 Ft^2

Table 1-1: Summary of Components Containing Lead of Building 23

Area	Component	Color	Substrate	Approximate Amount
Exterior Side C	Wall Surface	Cream	Concrete	369 Ft^2

Note:

1. The quantification of positive materials presented in this table is only an estimate. If an abatement of the materials will be conducted, the Contractors shall estimate the amount of materials to be abated.

Section 2: Lead-Based Paint Inspection Report

2.1 Overview of the Evaluation

This lead-based paint inspection is an investigation to identify all lead-based paint on a surface-by-surface basis. A lead-based paint inspection conforming to HUD guidelines was performed at the buildings mentioned above.

An average of 113 samples were taken at identified surfaces of the evaluated areas using an X-ray fluorescence (XRF) analyzer. The evaluation found that lead-based paint was present in selective components and surfaces through the buildings on the assessment date (See Table 1-1).

Some of the remaining XRF test locations exhibited lead-in-paint levels below the level that EPA identifies as lead-based paint, namely 1.0 mg/cm^2. Such surfaces could create dust-lead or soil-lead hazards if the paint is turned into dust by abrasion, scraping, or sanding. Should these or any lead-containing components or surfaces be disturbed in any manner that generates dust, care should be taken to limit its spread.

Testing was performed by Alicia García, state-certified lead inspector LBPI-21925-282, using the SciAps X550Pb, SN-03578. The credentials are provided in Section 3, Appendix A: Certifications, Licenses, and Accreditations. The XRF analyzer is designed to measure the lead content of surface coatings on various building surfaces, substrates, and components. The measurement is rapid and nondestructive and, according to the manufacturer, can detect lead concentrations within numerous layers of various surface coatings.

Please refer to the XRF Testing Results Section 3, Appendix B: XRF Sampling Data for each inspected area's detailed analytical testing results. The reports provide complete testing data.

2.2 Sampling Procedure

The Lead-Based Paint Sampling Procedure was designed to evaluate and document all the data obtained from the inspection in a sequential method that provided confidence at the moment of the presentation of the results.

The survey followed the methodology established in the HUD Guidelines for the Evaluation and Control of Lead-Based Paint in Housing (2012 revision) and the Department of Natural and Environmental Resources (DRNA) of Puerto Rico Regulation 9098: Regulation for Proper Management of Lead-Based Paint Activities. The surface-by-surface evaluation was performed as follows:

- If the lead concentration measured by the XRF Spectrum Analyzer is less than 1.0 mg/cm^2, it is considered negative.

- If the lead concentration measured by the XRF Spectrum Analyzer is equal to or greater than 1.0 mg/cm^2, it is considered positive.

A name was assigned to each functional space of the buildings based on the use of that space. A code letter or number was assigned if no name could be assigned.

Each wall surface was named with letters beginning with wall A, the wall facing the main entrance direction. The wall on your left will be wall B, the wall in front wall C, and the wall on your right will be wall D.

2.3 Results Presentation

This section describes the building components and surfaces coated with lead-based paint (LBP) and/or containing lead, which were observed in the inspection. Please note that the recommendations given are the minimum required action, which should be taken based on our professional judgment.

According to the DRNA lead regulations, before demolishing a structure containing lead-based paint, the contaminated surfaces or substrates must be abated or removed. The abatement firm must be certified as an abatement firm by the DRNA.

2.3.1 Specific Findings

The following LBP was found to contain more or equal to 1.0 mg/cm^2 for what the Department of Natural and Environmental Resources (DRNA) of Puerto Rico identifies as lead-based paint or materials containing lead:

- Curb
- Floor Lines
- Loading Bases
- Loading Door Lines
- Ramp
- Riser
- Round Columns
- Stringer
- Wall Surface

2.3.2 Homogeneous Areas with Special Considerations

NONE

2.3.3 Inaccessible Areas Presumed to be Lead-Based Painted

NONE

2.4 Lead Regulatory Levels

The lead regulatory levels provided below are those used when preparing this lead-based paint evaluation or when evaluating data collected. The EPA regulatory levels are the same as the state regulatory levels provided in the following table.

Table 2-1: Lead Regulatory Levels

	EPA/DRNA Levels
Lead-Based Paint	**1.0 mg/cm^2 or 0.5% by weight (or 5,000 ppm)**

2.5 Conditions and Limitations—Disclaimer

Zimmetry Environmental Management Corp. has performed this lead-based paint inspection thoroughly and professionally, 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 these buildings on the evaluation date.

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

The lead inspection was performed to ready accessible components and surfaces. If suspected components that could contain lead are encountered underneath currently installed tiles or other construction material, they shall be managed as containing lead until the appropriate test is performed. According to the DRNA in the "Regulation for the Proper Management of Lead-Based Paint Activities" Rule 139 (Section E, Part 17), all lead-based paint reports have a validity period of five (5) years.

2.6 Abatement Conditions

As defined by HUD and the Department of Natural and Environmental Resources (DRNA) of Puerto Rico, abatement means any set of measures designed to permanently eliminate lead-based paint and/or lead-based paint hazards. The people providing these services must be trained under the DRNA licensing/certification requirements. The product manufacturer and/or contractor must warrant abatement methods to last at least 20 years, or these methods must have a design life of at least 20 years.

- onsite or offsite removal of lead-based paint from substrates and components
- replacement of components or fixtures painted with lead-based paint

- permanent enclosure of lead-based paint with construction materials mechanically fastened to the substrate
- encapsulation of lead-based paint with specially designed encapsulant products
- removal or permanent covering (concrete or asphalt) of soil-lead-based paint hazards

If enclosure or encapsulation is conducted as an abatement method, the lead-based paint remains on the property, so ongoing lead-based paint maintenance is required.

2.7 Recommendations

According to the DRNA lead regulations, before demolishing a structure containing lead-based paint, the contaminated surfaces or substrates must be abated or removed. The waste generated has to be characterized to determine if the waste generated is hazardous or non-hazardous waste. The abatement firm must be certified as an abatement firm by the DRNA. Workers conducting abatement must be trained and certified as abatement workers by a training provider accredited by the DRNA.

2.8 Environmental Assessment Report Certification

Zimmetry Environmental Management Corp. has performed this lead-based paint inspection thoroughly and professionally, consistent with commonly accepted industry standards. The inspection was conducted on September 5, 2025, by Alicia García, state-certified lead inspector LBPI-21925-282, qualified by experience, education, and training in the recognition of lead-based paint and approved sampling techniques using the SciAps X550Pb, SN-03578.

Alicia García

Alicia García Justiniano, MS
Environmental Lead Inspector

Section 3: Appendices

Appendix A: Certifications, Licenses, and Accreditations

Appendix B: XRF Sampling Data

Appendix C: XRF's Performance Characteristics Sheet

Appendix D: Photographic Record

Appendix E: Location of Positive Materials

APPENDIX A

Certifications, Licenses and Accreditations

ZIMMETRY ENVIRONMENTAL

GOBIERNO DE PUERTO RICO

Departamento de Recursos Naturales y Ambientales

Este certificado es otorgado a:

Zimmetry Environmental Management, Corp.

Por haber cumplido con los requisitos establecidos en el Capítulo VI, Regla 127 del Reglamento para el Manejo Adecuado de Actividades de Pintura con Base de Plomo. Se le otorga esta certificación como Firma para llevar a cabo actividades relacionadas a Mitigación de Pintura con base de plomo en la jurisdicción de Puerto Rico.

Número de Certificado

LBPF-06325-016

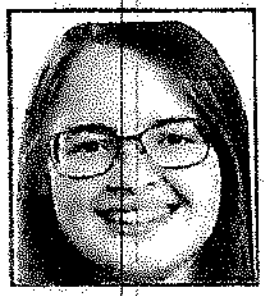
Fecha de emisión: Marzo 4, 2025

Fecha de Expiración: Marzo 3, 2026

DRNA

Firma Autorizada
Departamento de Recursos Naturales
y Ambientales

CERTIFICACIÓN PLOMO PUERTO RICO



Esta tarjeta autoriza a:

Alicia García Justiniano

Para realizar actividades relacionadas a
Mitigación de Pintura con Base de Plomo

Disciplina: **Inspector**

Fecha de Expiración: Julio 14, 2026

Certificación #:

LBPI-21925-282

DRNA

Firma Autorizada

Certificate of Training

Alicia Garcia-Justiniano

Of Zimmetry Environmental has completed the SciAps instrument operator training & Radiation Safety Training for the

X550 Pb HUD/EPA Lead Paint Analyzer provided by Tim Johnson.

SciAps

Instrument Operator Training & Radiation Safety Training

X550Pb HUD/EPA Lead Paint Analyzer

I confirm that the above-named individual has received the training listed on this certificate.

Tim Johnson
Name

April 1, 2025
Date

Certified Trainer
Title

I certify that I have received the stated training and understand the content presented.

Alicia Garcia-Justiniano
Name

April 1, 2025
Date

APPENDIX B

XRF Sampling Data

ZIMMETRY ENVIRONMENTAL

PROJECT:	Buildings 23 & 23A at Camp Santiago Joint Training Center, Salinas PR			CLIENT: PRANG			
DATE:	9/5/2025	Building 23		LBP Inspector: Alicia Garcia			
Sample ID.	Functional Space	Location	Color	Subst.	XRF Reading mg/cm2	Pos/Neg	Comments
1	Calibration				1.00		
2	Calibration				1.00		
3	Calibration				1.00		
4	Area 1-1	Round Column	White	Metal	5.67	Positive	
5	Area 1-1	Round Column	White	Metal	5.66	Positive	
6	Area 1-1	Column	White	Metal	0.01	Negative	
7	Area 1-1	Floor Line	Yellow	Concrete	4.08	Positive	
8	Area 1-1	Floor Line	Yellow	Concrete	4.32	Positive	
9	Area 1-1	Floor Line	Yellow	Concrete	4.27	Positive	
10	Area 1-1	Floor Line	White	Concrete	0.12	Negative	
11	Area 1-1	Wall A	Cream	Concrete	0.00	Negative	
12	Area 1-1	Wall C	Cream	Concrete	0.09	Negative	
13	Area 1-1	Wall C	Cream	Concrete	0.09	Negative	
14	Area 1-1	Wall D	Cream	Concrete	0.23	Negative	
15	Area 1-1	Window Shutter	White	Metal	0.00	Negative	
16	Area 1-1	Column	White	Metal	0.07	Negative	
17	Area 1-1	Column	White	Metal	0.07	Negative	
18	Area 1-1	Wall A	Gray	Metal	0.00	Negative	
19	Area 1-1	Wall C	Gray	Metal	0.00	Negative	
20	Area 1-1	Wall D	Gray	Metal	0.00	Negative	
21	Area 1-1	Rolling Door Frame	Cream	Metal	0.00	Negative	
22	Area 1-1	Door	White	Metal	0.00	Negative	
23	Area 1-1	Door Frame	White	Metal	0.00	Negative	
24	Area 1-1	Beam	Cream	Metal	0.04	Negative	
25	Area 1-1	Beam	Cream	Metal	0.04	Negative	
26	Area 1-1	Lattice Beam	Cream	Metal	0.04	Negative	
27	Area 1-1	Lattice Beam	Cream	Metal	0.04	Negative	
28	Area 1-2	Round Column	Cream	Metal	4.94	Positive	
29	Area 1-2	Round Column	White	Metal	4.40	Positive	
30	Area 1-2	Floor Line	Yellow	Concrete	1.50	Positive	
31	Area 1-2	Floor Line	Yellow	Concrete	2.23	Positive	
32	Area 1-2	Floor Line	Yellow	Concrete	1.92	Positive	
33	Area 1-2	Floor Line	White	Concrete	0.06	Negative	
34	Area 1-2	Wall A	Cream	Concrete	0.00	Negative	
35	Area 1-2	Wall B	Cream	Concrete	0.02	Negative	
36	Area 1-2	Wall B	Cream	Concrete	0.03	Negative	
37	Area 1-2	Wall C	Cream	Concrete	0.20	Negative	
38	Area 1-2	Door	Black	Metal	0.00	Negative	
39	Area 1-2	Door Frame	Black	Metal	0.00	Negative	
40	Area 1-2	Door	Gray	Metal	0.02	Negative	
41	Area 1-2	Door Frame	Gray	Metal	0.02	Negative	
42	Area 1-2	Column	Cream	Concrete	0.00	Negative	
43	Area 1-2	Wall A	Gray	Metal	0.00	Negative	
44	Area 1-2	Wall B	Gray	Metal	0.00	Negative	
45	Area 1-2	Wall C	Gray	Metal	0.00	Negative	
46	Area 1-2	Rolling Door Frame	Cream	Metal	0.01	Negative	
47	Area 1-3	Floor Line	Yellow	Concrete	0.28	Negative	
48	Area 1-3	Floor Line	Yellow	Concrete	0.21	Negative	
49	Area 1-3	Railing	Brown	Metal	0.00	Negative	
50	Area 1-3	Wall C	Cream	Concrete	0.71	Negative	
51	Area 1-3	Wall C	Cream	Metal	0.00	Negative	
52	Area 1-3	Floor Line	Yellow	Concrete	4.06	Positive	
53	Area 1-3	Floor Line	Yellow	Concrete	4.02	Positive	
54	Area 1-3	Floor Line	Yellow	Concrete	1.94	Positive	
55	Area 1-3	Ramp	Yellow	Concrete	2.00	Positive	
56	Area 1-3	Wall C	Cream	Concrete	0.78	Negative	
57	Area 1-3	Wall C	Cream	Metal	0.00	Negative	
58	Exterior Area, Side B	Wall B	Cream	Concrete	0.07	Negative	
59	Exterior Area, Side B	Wall B	Cream	Concrete	0.06	Negative	
60	Exterior Area, Side B	Wall B	Cream	Metal	0.00	Negative	

PROJECT:	Buildings 23 & 23A at Camp Santiago Joint Training Center, Salinas PR			CLIENT: PRANG			
DATE:	9/5/2025	Building 23		LBP Inspector: Alicia Garcia			
Sample ID	Functional Space	Location	Color	Substr.	XRF Reading mg/cm2	Pos/Neg	Comments
61	Exterior Area, Side B	Wall B	Cream	Metal	0.00	Negative	
62	Exterior Area, Side A	Wall A	Cream	Concrete	0.37	Negative	
63	Exterior Area, Side A	Wall A	Yellow	Concrete	0.07	Negative	
64	Exterior Area, Side A	Wall A	Yellow	Concrete	0.02	Negative	
65	Exterior Area, Side A	Loading Door Line	Yellow	Concrete	1.70	Positive	
66	Exterior Area, Side A	Loading Door Line	Yellow	Concrete	2.40	Positive	
67	Exterior Area, Side A	Curb	Yellow	Concrete	1.37	Positive	
68	Exterior Area, Side A	Loading Base	Yellow	Metal	1.63	Positive	
69	Exterior Area, Side A	Wall A	Cream	Concrete	0.06	Negative	
70	Exterior Area, Side A	Wall A	Cream	Concrete	0.70	Negative	
71	Exterior Area, Side A	Stringer	Yellow	Concrete	2.44	Positive	
72	Exterior Area, Side A	Stringer	Yellow	Concrete	2.37	Positive	
73	Exterior Area, Side A	Stringer	Cream	Concrete	2.40	Positive	
74	Exterior Area, Side A	Stringer	Cream	Concrete	1.35	Positive	
75	Exterior Area, Side A	Riser	Yellow	Concrete	1.52	Positive	
76	Exterior Area, Side D	Wall D	Cream	Concrete	0.42	Negative	
77	Exterior Area, Side D	Wall D	Cream	Concrete	0.40	Negative	
78	Exterior Area, Side D	Wall D	Cream	Metal	0.00	Negative	
79	Exterior Area, Side D	Wall D	Cream	Metal	0.00	Negative	
80	Exterior Area, Side D	Wall D	Cream	Concrete	0.77	Negative	
81	Exterior Area, Side C	Wall C	Cream	Concrete	0.90	Negative	
82	Exterior Area, Side C	Wall C	Cream	Concrete	1.08	Positive	
83	Exterior Area, Side C	Wall C	Cream	Concrete	1.00	Positive	
84	Exterior Area, Side C	Wall C	Cream	Metal	0.00	Negative	
85	Exterior Area, Side C	Wall C	Cream	Metal	0.00	Negative	

PROJECT:	Buildings 23 & 23A at Camp Santiago Joint Training Center, Salinas PR			CLIENT: PRANG			
DATE:	9/5/2025	Building 23A		LBP Inspector: Alicia Garcia			
Sample ID.	Functional Space	Location	Color	Subst.	XRF Reading mg/cm2	Pos/Neg	Comments
86	Area 1-1	Column	Brown	Metal	0.00	Negative	
87	Area 1-1	Column	Brown	Metal	0.00	Negative	
88	Area 1-1	Column Base	Yellow	Concrete	0.01	Negative	
89	Area 1-1	Corner Guard	Yellow	Concrete	0.00	Negative	
90	Area 1-1	Wall B	Cream	Concrete	0.00	Negative	
91	Area 1-2	Column	Brown	Metal	0.00	Negative	
92	Area 1-2	Column	Brown	Metal	0.00	Negative	
93	Area 1-2	Column	Brown	Metal	0.00	Negative	
94	Area 1-2	Column	Brown	Metal	0.00	Negative	
95	Area 1-2	Beam	Brown	Concrete	0.00	Negative	
96	Area 1-2	Wall D	Cream	Concrete	0.03	Negative	
97	Area 1-2	Cross Beam	Brown	Metal	0.00	Negative	
98	Area 1-2	Cross Beam	Brown	Metal	0.00	Negative	
99	Area 1-2	Cross Beam	Brown	Metal	0.00	Negative	
100	Area 1-2	Cross Beam	Brown	Metal	0.00	Negative	
101	Exterior Area, Side C	Column	Brown	Metal	0.00	Negative	
102	Exterior Area, Side C	Column	Yellow	Metal	0.00	Negative	
103	Exterior Area, Side C	Column Base	Yellow	Concrete	0.00	Negative	
104	Exterior Area, Side B	Column	Yellow	Metal	0.01	Negative	
105	Exterior Area, Side B	Pole	Yellow	Metal	0.01	Negative	
106	Exterior Area, Side B	Column	Brown	Metal	0.00	Negative	
107	Exterior Area, Side B	Column Base	Yellow	Concrete	0.00	Negative	
108	Exterior Area, Side D	Column Base	Yellow	Concrete	0.00	Negative	
109	Exterior Area, Side D	Column	Brown	Metal	0.00	Negative	
110	Exterior Area, Side A	Column	Brown	Metal	0.03	Negative	
111	Calibration				1.00		
112	Calibration				1.00		
113	Calibration				1.00		

APPENDIX C

XRF Performance Characteristic Sheet

ZIMMETRY ENVIRONMENTAL

Performance Characteristic Sheet

EFFECTIVE DATE: **February 1, 2022**

MANUFACTURER AND MODEL:

Make: ***SciAps***
Models: ***Model X-550***
X-Ray Source: ***Rhodium (Rh) or Gold (Au) Anode***

FIELD OPERATION GUIDANCE

ACTION LEVEL SETTING:

1.0 mg/cm²

OPERATING PARAMETERS:

Timed mode: fixed 10-second reading.

Quick mode: variable-time reading (approximately 2-6 seconds).

XRF CALIBRATION CHECK LIMITS:

0.8 to 1.2 mg/cm² (inclusive) on NIST SRM 2579 (1.02 mg/cm²)/NIST SRM 2573, or equivalent

SUBSTRATE CORRECTION:

Not applicable

INCONCLUSIVE RANGE OR THRESHOLD:

Au Anode (quick) **READING DESCRIPTION**	**SUBSTRATE**	**THRESHOLD (mg/cm²)**
Results not corrected for substrate bias on any substrate	Brick Concrete Drywall Metal Plaster Wood	1.0 1.0 1.0 1.0 1.0 1.0
Rh Anode (Timed or Quick), Au Anode (Timed) **READING DESCRIPTION**	**SUBSTRATE**	**THRESHOLD (mg/cm²)**
Results not corrected for substrate bias on any substrate	Brick Concrete Drywall Metal Plaster Wood	0.9 0.9 0.9 0.9 0.9 0.9

BACKGROUND INFORMATION

EVALUATION DATA SOURCE AND DATE:

This sheet is supplemental information to be used in conjunction with Chapter 7 of the HUD *Guidelines for the Evaluation and Control of Lead-Based Paint Hazards in Housing*, 2012 Edition ("HUD Guidelines"). Performance parameters shown on this sheet are calculated using test results on building components in the HUD archive. Testing was conducted on 146 test samples in February 2022, with two separate instruments of each Anode type, operated in both Timed and Quick modes.

OPERATING PARAMETERS

Performance parameters shown in this sheet are applicable only when properly operating the instrument using the manufacturer's instructions and procedures described in Chapter 7 of the HUD Guidelines.

XRF CALIBRATION CHECK:

The calibration of the XRF instrument should be checked using the paint film nearest 1.0 mg/cm² in the NIST Standard Reference Material (SRM) used (e.g., for NIST SRM 2579, use the 1.02 mg/cm² film; for NIST SRM 2579a, use film 2573 (1.04 mg/cm²).

If the average (rounded to 1 decimal place) of three readings is outside the acceptable calibration check range, follow the manufacturer's instructions to bring the instrument into control before XRF testing proceeds.

EVALUATING THE QUALITY OF XRF TESTING:

Randomly select ten testing combinations for retesting from each house or from two randomly selected units in multifamily housing.

Conduct XRF re-testing at the ten testing combinations selected for retesting.

Determine if the XRF testing in the units or house passed or failed the test by applying the steps below. Compute the Retest Tolerance Limit by the following steps:

Determine XRF results for the original and retest XRF readings. In single-family and multi-family housing, a result is defined as a single reading. Therefore, there will be ten original and ten retest XRF results for each house or for the two selected units.

Calculate the average of the original XRF result and the retest XRF result for each testing combination.

Square the average for each testing combination.

Add the ten squared averages together. Call this quantity C.

Multiply the number C by 0.0072. Call this quantity D.

Add the number 0.032 to D. Call this quantity E.

Take the square root of E. Call this quantity F.

Multiply F by 1.645. The result is the Retest Tolerance Limit.

Compute the average of all ten original XRF readings.

Compute the average of all ten re-test XRF readings.

Find the absolute difference of the two averages.

If the difference is less than the Retest Tolerance Limit, the inspection has passed the retest. If the difference of the overall averages equals or exceeds the Retest Tolerance Limit, this

procedure should be repeated with ten new testing combinations. If the difference of the overall averages is equal to or greater than the Retest Tolerance Limit a second time, then the inspection should be considered deficient.

Use of this procedure is estimated to produce a spurious result approximately 1% of the time. That is, results of this procedure will call for further examination when no examination is warranted in approximately 1 out of 100 dwelling units tested.

TESTING TIMES:

The reading time in Archive tests was 10 seconds in Timed mode and from 2-6 seconds in Quick mode, for both the Rh Anode and Au Anode.

CLASSIFICATION OF RESULTS:

XRF results for the Au Anode in Quick mode are classified as **positive** if they are **greater than or equal** to 1.0 mg/cm² and ***negative*** if they are ***less than*** *to* 1.0 mg/cm². XRF results for the Au Anode in Timed mode and for the Rh Anode in Timed or Quick mode are classified as **positive** if they are **greater than or equal** to 0.9 mg/cm² and ***negative*** if they are ***less than*** *to* 0.9 mg/cm²

DOCUMENTATION:

A report titled *Methodology for XRF Performance Characteristic Sheets* (EPA 747-R-95-008) provides an explanation of the statistical methodology used to develop Performance Characteristic Sheets at the Federal standard (Action Level) of 1.0 mg/cm² and provides empirical results from using the recommended inconclusive ranges or thresholds for specific XRF instruments. The report may be downloaded at http://www2.epa.gov/lead/methodology-xrf-performance-characteristic-sheets-epa-747-r-95-008-september-1997.

APPENDIX D

Photographic Record

ZIMMETRY ENVIRONMENTAL

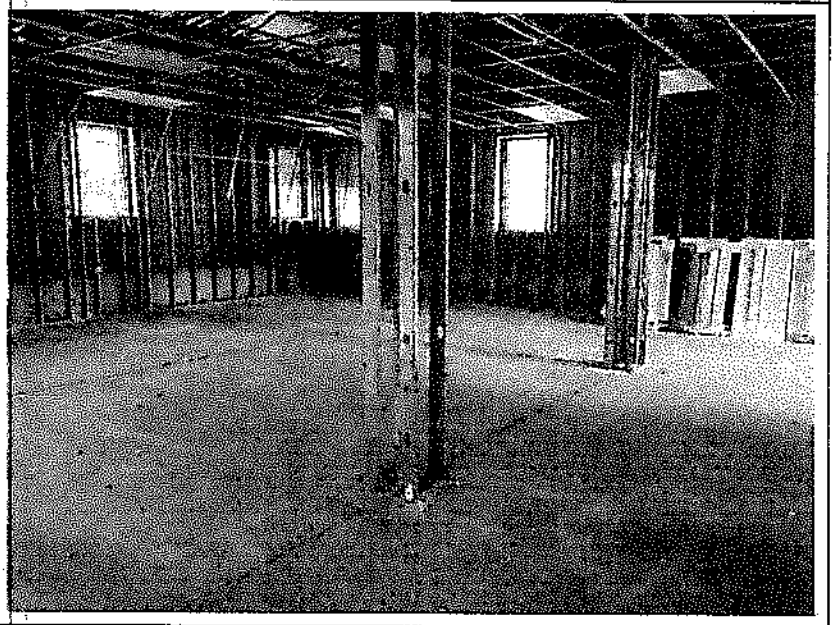
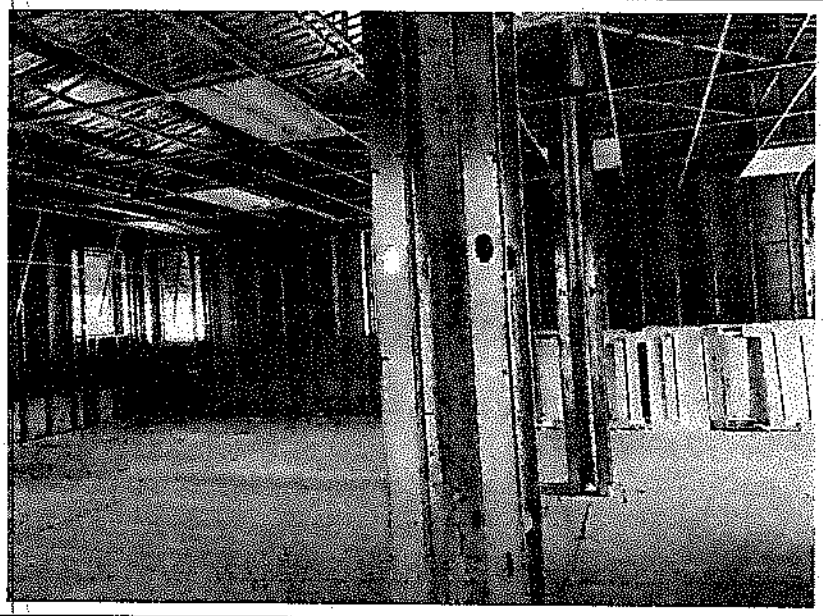
Photo No. 2256	Date: 09/05/2025
Description: **Bldg. 23, Area 1-1** Lead-based painted metal round column.	

Photo No. 2257	Date: 09/05/2025
Description: **Bldg. 23, Area 1-1** Lead-based painted metal round column.	

Photographic Documentation is for reference purposes and doesn't necessarily include all the surfaces with lead.

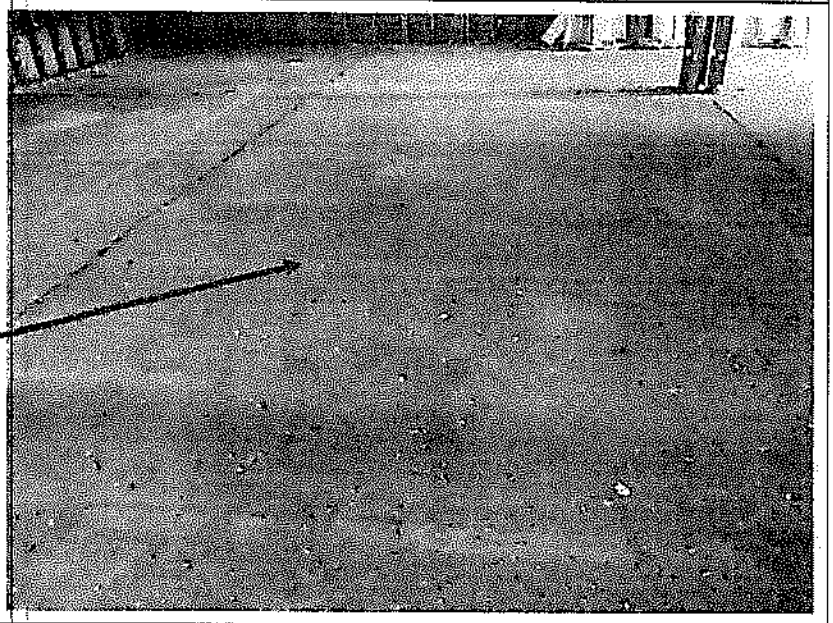
Photo No. 2258	Date: 09/05/2025
Description: **Bldg. 23, Area 1-1** Lead-based painted concrete floor lines.	

Photo No. 2259	Date: 09/05/2025
Description: **Bldg. 23, Area 1-1** Lead-based painted concrete floor lines.	

Photographic Documentation is for reference purposes and doesn't necessarily include all the surfaces with lead.

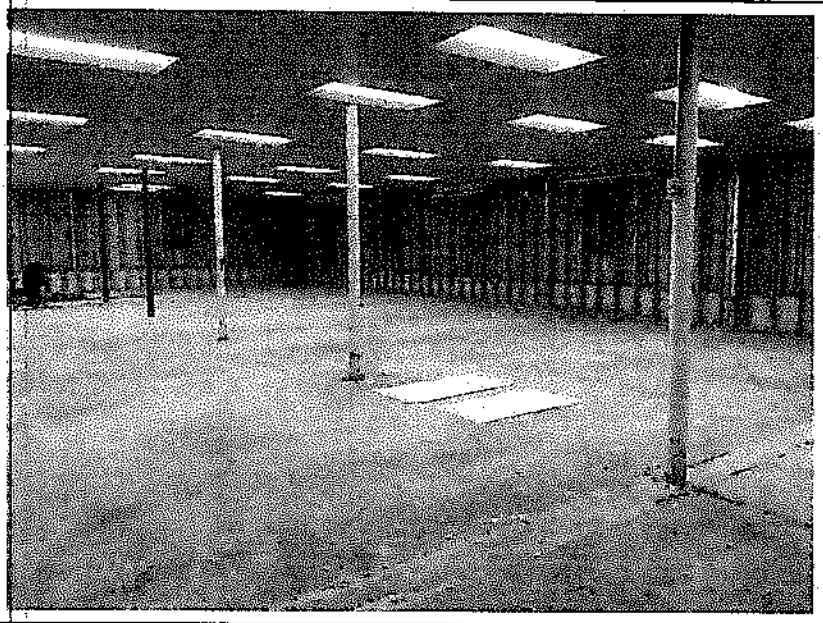
Photo No. 2261	Date: 09/05/2025
Description: **Bldg. 23, Area 1-2** Lead-based painted metal round column.	

Photo No. 2262	Date: 09/05/2025
Description: **Bldg. 23, Area 1-2** Lead-based painted concrete floor lines.	

Photographic Documentation is for reference purposes and doesn't necessarily include all the surfaces with lead.

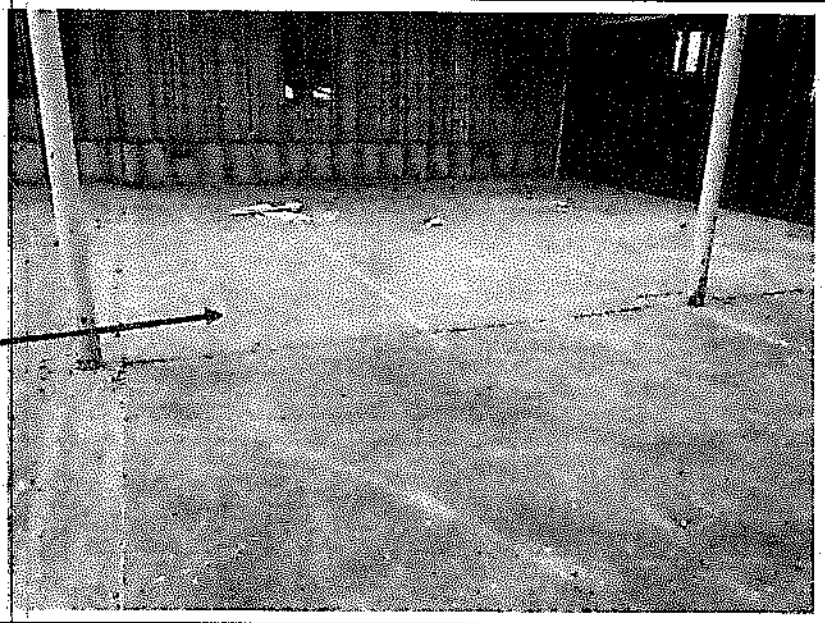
Photo No. 2263	Date: 09/05/2025
Description: **Bldg. 23, Area 1-2** Lead-based painted concrete floor lines.	

Photo No. 2264	Date: 09/05/2025
Description: **Bldg. 23, Area 1-3** Lead-based painted concrete floor lines.	

Photographic Documentation is for reference purposes and doesn't necessarily include all the surfaces with lead.

Photo No. 2266	Date: 09/05/2025
Description: **Bldg. 23, Area 1-3** Lead-based painted concrete floor lines.	

Photo No. 2267	Date: 09/05/2025
Description: **Bldg. 23, Area 1-3** Lead-based painted concrete floor lines.	

Photographic Documentation is for reference purposes and doesn't necessarily include all the surfaces with lead.

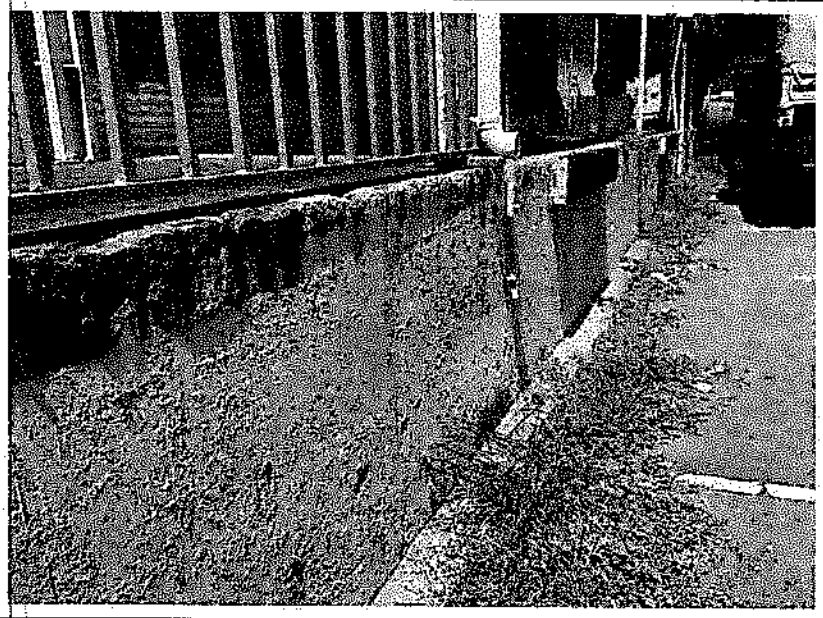
Photo No. 2265	Date: 09/05/2025



Description:

Bldg. 23, Area 1-3
Lead-based painted concrete ramp.

Photo No. 2272	Date: 09/05/2025

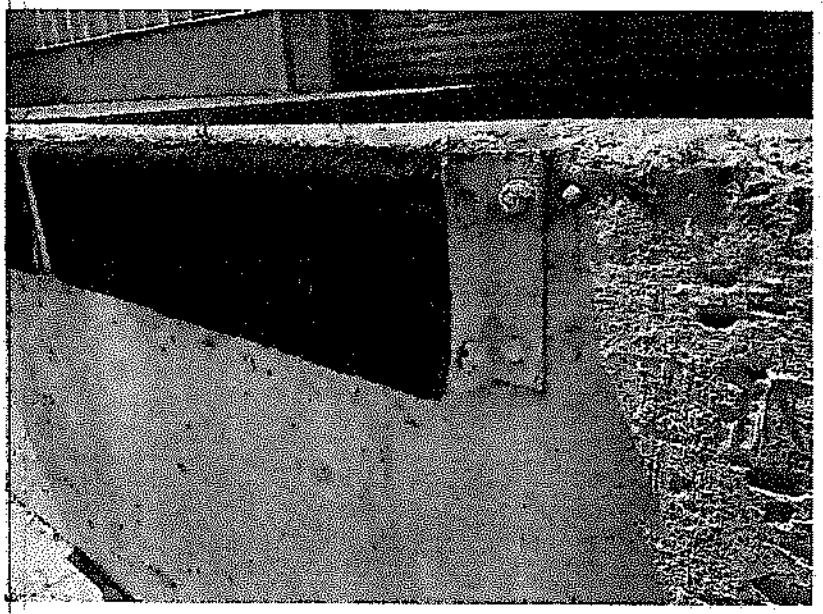


Description:

Bldg. 23,
Exterior Area (Side A)
Lead-based painted concrete loading door lines.

Photographic Documentation is for reference purposes and doesn't necessarily include all the surfaces with lead.

Photo No. 2271	Date: 09/05/2025
Description: **Bldg. 23,** **Exterior Area (Side A)** Lead-based painted concrete curb.	

Photo No. 2268	Date: 09/05/2025
Description: **Bldg. 23,** **Exterior Area (Side A)** Lead-based painted concrete loading bases.	

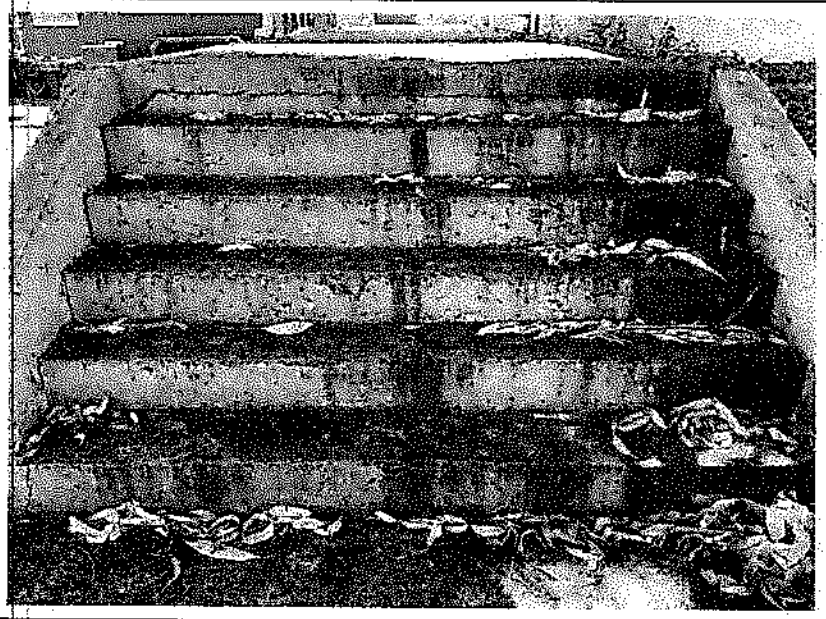
Photographic Documentation is for reference purposes and doesn't necessarily include all the surfaces with lead.

Photo No. 2269	Date: 09/05/2025	
Description: **Bldg. 23,** **Exterior Area (Side A)** Lead-based painted concrete loading bases.		

Photo No. 2275	Date: 09/05/2025	
Description: **Bldg. 23,** **Exterior Area (Side A)** Lead-based painted concrete stringer.		

Photographic Documentation is for reference purposes and doesn't necessarily include all the surfaces with lead.

Photo No. 2276	Date: 09/05/2025
Description: **Bldg. 23,** **Exterior Area (Side A)** Lead-based painted concrete stringer.	

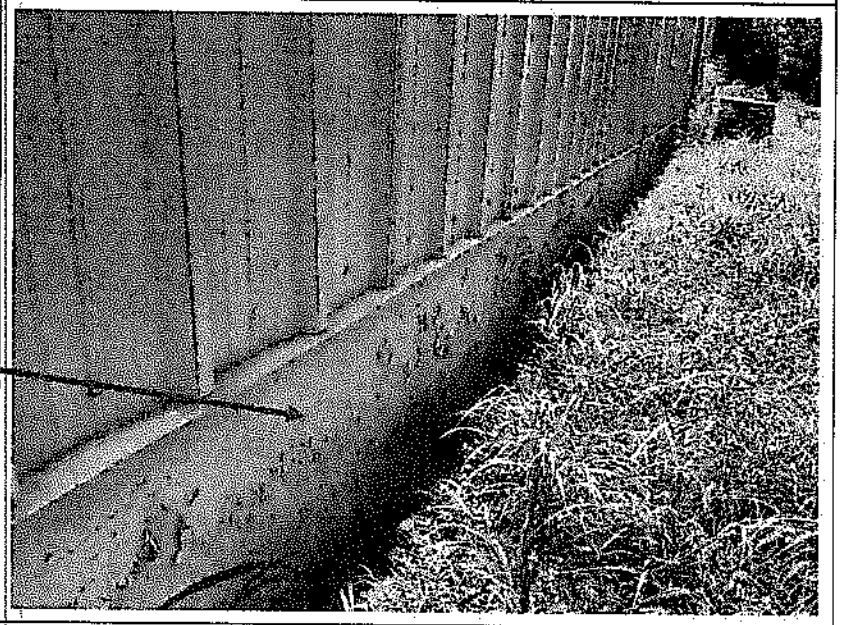
Photo No. 2274	Date: 09/05/2025
Description: **Bldg. 23,** **Exterior Area (Side A)** Lead-based painted concrete riser.	

Photographic Documentation is for reference purposes and doesn't necessarily include all the surfaces with lead.

Photo No.	Date:
2277	09/05/2025

Description:

Bldg. 23,
Exterior Area (Side C)
Lead-based painted concrete wall surface.

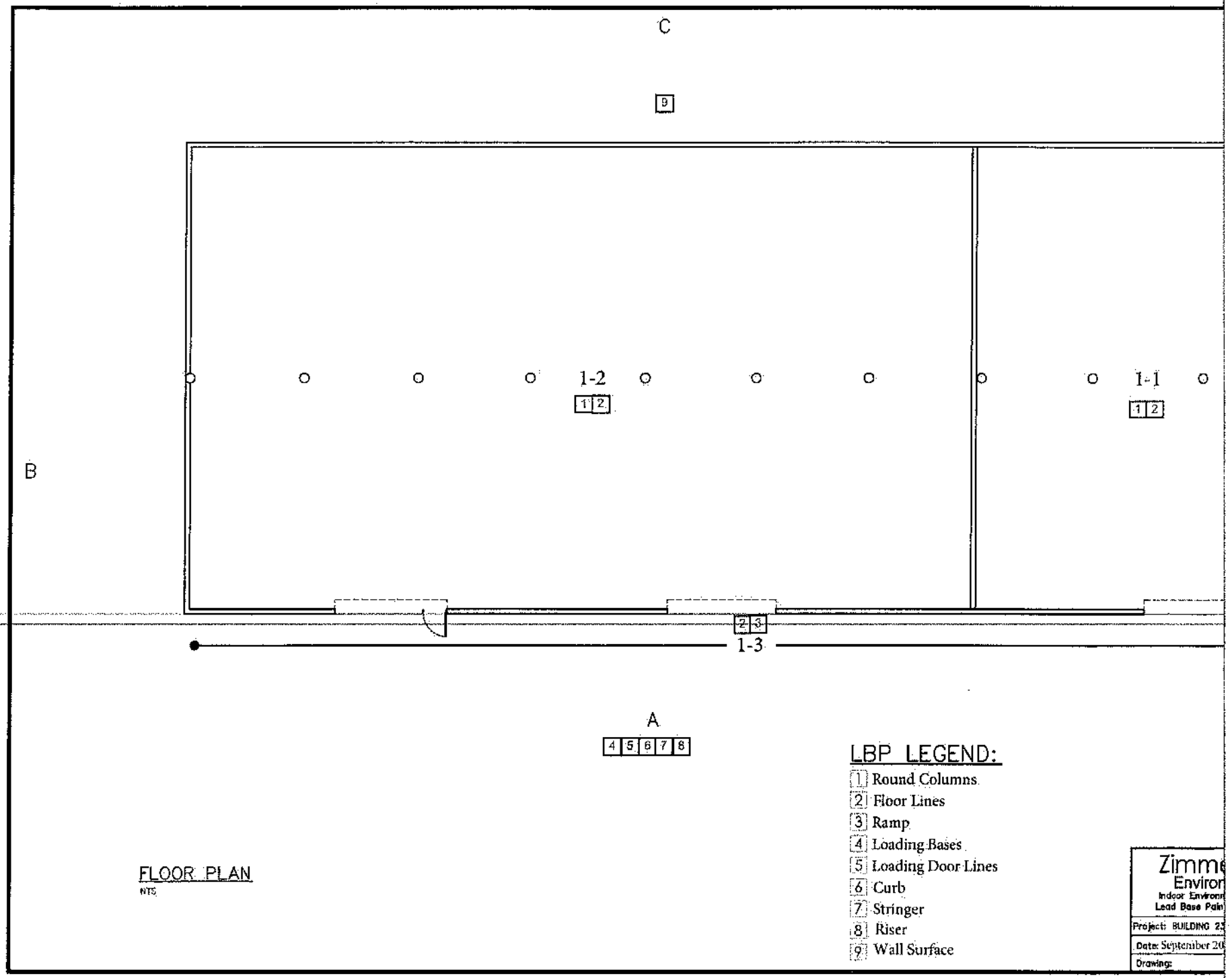


Photographic Documentation is for reference purposes and doesn't necessarily include all the surfaces with lead.

APPENDIX E

Location of Positive Materials

ZIMMETRY ENVIRONMENTAL



FLOOR PLAN
NTS

LBP LEGEND:

1. Round Columns
2. Floor Lines
3. Ramp
4. Loading Bases
5. Loading Door Lines
6. Curb
7. Stringer
8. Riser
9. Wall Surface

Zimme
Environ
Indoor Environ
Lead Base Pain

Project: BUILDING 2
Date: September 20
Drawing:

GOBIERNO DE PUERTO RICO
OFICINA DEL GOBERNADOR
JUNTA DE CALIDAD AMBIENTAL

Área de Calidad de Agua

OGPe
Oficina de Gerencia de Permisos

Forma PGC-010

CERTIFICACION DE NO PRESENCIA DE PINTURA CON BASE DE PLOMO EN ESTRUCTURAS A DEMOLERSE

(Deberá completarse en letra de molde o impresa)

PGC-_____
PARA USO OFICIAL

Yo, Alicia García (Inspector o Evaluador de Riesgos), mayor de edad, casada (Estado Civil), y vecino de Bayamón (Municipio)

Dirección Postal PO Box 3545 Bayamón (Pueblo) 00958 (Zip Code)

Teléfonos: Residencial (787) 550 - 2061 Oficina (787) 995 - 0005 Ext._____

Fax (787) 995 - 0005

Certifico que:

1. Estoy certificado por la Junta de Calidad Ambiental como (☒ Inspector / ☐ Evaluador de Riesgos) con Número de Certificación LBPI-21925-282, la cual se encuentra vigente.
2. La estructura localizada en Building 23A Located at Camp Santiago Joint Training Center, Salinas PR, la cual será objeto de una demolición se encuentra libre de pintura con base de plomo.
3. La información antes indicada es cierta y correcta.
4. Afirmo y reconozco las consecuencias de incluir y someter información falsa en este documento.
5. Para que así conste, firmo la presente certificación en Bayamón (Municipio) de Puerto Rico, hoy día 24 de septiembre de 2025

Alicia García
Firma del Inspector o Evaluador de Riesgos (en original)

Nota : Deberá someter evidencia de la tarjeta o certificado provista por la JCA.

Dirección Física: Ave. Ponce de León 1308, Carr. Estatal 8838, Sector el Cinco, Río Piedras, PR 00926
Dirección Postal: Apartado 11488, Santurce, PR 00910-1488
Tel. (787) 767-8181 • Fax (787) 767-1962

PUERTO RICO VERDE

CERTIFICATION

CERTIFICACIÓN PLOMO PUERTO RICO



Esta tarjeta autoriza a:

Alicia García Justiniano

Para realizar actividades relacionadas a
Mitigación de Pintura con Base de Plomo

Disciplina: **Inspector**

Fecha de Expiración: julio 14, 2026

Certificación #:
LBPI-21925-282

DRNA

Firma Autorizada