

APPENDIX C



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**Re: Lead Paint Assessment – Roof Replacement Project
Addendum**

The paint from the ceiling in the Paint Shop open area is falling on the floor during the roof replacement project. There are concerns regarding whether the paint is lead containing.

METHOD

One sample was collected from the debris that fell on the floor in the open area of the Paint Shop. The sample was analyzed for lead using EPA method 7000B by Schneider Laboratories Global Inc.

RESULTS

The following is a quotation from the most recent amendment to the Surface Coating and Materials Regulation under the Consumer Product Safety Act (Canada) dated June 21, 2016.

A surface coating material must not contain more than 90 mg/kg total lead when a dried sample is tested in accordance with a method that conforms to good laboratory practices.

This amendment is intended to protect the health and safety of Canadian children while at the same time it aligns Canada with the U.S. with respect to total lead levels in surface coating materials and certain products that contain surface coating materials:

- Under subsections 2(1) and 3(1) and section 6 of the Surface Coatings Materials Regulations, the total lead limit is now 90 mg/kg.

It is recommended that the Health Canada criteria of 0.009% (90 mg/kg) be used in the absence of specific Manitoba legislative criteria for lead-based paint.

The following table gives the results for the paint samples collected on July 25, 2019. The amount of lead found in the bulk sample is given in the table below, along with the corresponding criteria. Laboratory results are appended to the end of the report.

Location	Lead mg/kg
Health Canada Criteria	90
Transfer Room Sample 2	298

CONCLUSION

Based on the Health Canada criteria, the paint on the ceiling in the Paint Shop would be considered lead-based paint.

There is very little research that correlates the amount of lead in paint to the airborne concentration that workers may be exposed to from falling lead paint flakes. The best way to ensure that the airborne concentration is below the occupational exposure limit is to reduce/eliminate the lead paint from becoming fine enough to get into the air.

In order to keep the airborne lead concentrations lower than the occupational exposure limit of 0.05 mg/m³, the clean-up procedures would be similar to an asbestos clean-up. Debris should be HEPA vacuumed or wet wiped. No dry sweeping should occur. Since the paint is in larger flakes (not microscopic asbestos fiber size, workers doing the cleanup should wear disposable gloves.

All paint debris is to be collected and disposed of as hazardous waste.

There is no requirement for post abatement air testing.

Yours truly,
For Elias Occupational Hygiene Consulting Inc.



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Laboratory Results

Sample ID	Cust. Sample ID	Location	Sample Date	Weight			
Parameter		Method		Total µg	% / Wt.	Conc.	RL*
328507-001	1	Ceiling Debris	07/25/19	514 mg			
Lead		EPA 7000B		153 µg	0.0298 %	298 mg/kg	19.5 mg/kg