



**LIMITED LEAD PAINT SURVEY**  
**State of Hawaii Laboratories Division**  
**2725 Waimano Home Road**  
**Pearl City, Hawaii 96782**

Submitted by:  
**ENVIRONMENTAL RISK ANALYSIS LLC**  
905A Makahiki Way  
Honolulu, Hawai'i 96826

January 2025

## **EXECUTIVE SUMMARY**

Environmental Risk Analysis, LLC (ERA) was retained by the State of Hawaii Laboratories Division to conduct a limited lead paint assessment for the proposed repainting project located at 2725 Waimano Home Road in Pearl City, Hawaii. This survey was performed in accordance with federal, state, and local regulatory requirements and evaluated suspect lead paint. Summary findings of the site investigation are detailed below. Samples were collected of materials which are anticipated to be disturbed during future repainting work. Photographic documentation (Appendix A), sample locations (Appendix B), inspector certification (Appendix C) and laboratory analytical results (Appendix D) and tables of sample results are provided at the end of this document.

## **LEAD-CONTAINING PAINTS**

The OSHA considers any detectable concentration of lead to be a potential hazard during construction activities. Samples were submitted to Hawaii Analytical Laboratory, LLC for total lead (Pb) analysis by EPA Method 7082. Building materials identified as Lead-Containing Paint (LCP) include:

- Sample L-03 – Exterior White Paint on metal railing (62 mg/kg)

Table 1 provides the results of the samples. Laboratory analytical data reports are provided in Appendix D.

If other painted areas not previously sampled are disturbed, they should be considered to be lead containing until confirmation samples are collected. Appropriate health and safety precautions should be taken when working with these materials. The general contractor performing the renovation and demolition work should be informed of the presence of lead in the project area. All personnel impacting lead-containing paint (or other lead-containing materials) should be provided additional training concerning the health effects of lead, proper work methods, appropriate use of personnel protective equipment, and regulations governing lead exposures. Air monitoring to assess lead exposures should be performed for all personnel involved in the renovation process where lead-containing paint may be removed.

## **RECOMMENDATIONS**

LCP was observed in this survey. These materials are subject to regulatory control. For LCP identified, all personnel impacting lead-containing paint (or other lead-containing materials) should be provided additional training concerning the health effects of lead, proper work methods, appropriate use of personnel protective equipment and regulations governing lead exposures. Air monitoring to assess lead exposures should be performed for all personnel involved in the renovation process where lead-containing paint may be removed.

For all materials to be disturbed, general safe work practices are recommended. These practices include:

- Respiratory protection;
- Protective clothing;
- Clean change areas; and
- Clean hand-washing facilities

Should additional suspect LCP materials be encountered during repainting activities, these materials should be handled as lead containing until they can be adequately characterized for lead content.

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## **1.0 INTRODUCTION**

Environmental Risk Analysis, LLC (ERA) was retained by the State of Hawaii Laboratories Division to conduct a limited lead paint assessment for the proposed repainting project located at 2725 Waimano Home Road in Pearl City, Hawaii. This survey was performed in accordance with federal, state, and local regulatory requirements and evaluated suspect lead paint. Summary findings of the site investigation are detailed below. The hazardous material survey was performed on January 17, 2025. Photographic documentation of the sampling events is provided in Appendix A.

The purpose of the survey was to provide information to assist with planning documents for potential painting of the building and structures at the Site. This survey was limited to the collection of lead paint chip samples as necessary, to identify regulated building materials that may be potentially impacted by future work.

The remainder of this report documents the findings of the assessment and provides tables summarizing materials sampled, analytical data, comments and recommendations for handling of hazardous materials identified.

## **2.0 WARRANTY (LIMITATIONS OF THE ASSESSMENT)**

Building materials sampled were collected from areas that were easily accessible. Should additional suspect building materials may be encountered during the proposed project, these materials should be analyzed prior to any disturbance from work activities. Every effort was made to collect all building materials. However, ERA does not guarantee the survey covers 100% of all building materials at the Site.

Conclusions contained within the report are professional opinions based solely upon visual observations at the Site and interpretations of analyses. The opinions presented herein apply to the conditions of the Site at the time of the investigation, and interpretation of current regulations. Therefore, opinions and recommendations provided may not apply to future conditions that may exist at the Site. Current regulations should always be verified prior to any work involving hazardous materials.

### **3.0 METHODOLOGY**

This section describes the sampling methodology used.

#### **3.1 Lead Survey Methodology**

A ‘walk-through’ inspection of accessible areas was conducted to identify suspect lead-containing paint (LCP).

##### **3.1.1 Sampling**

Suspect LCP was grouped into homogeneous sampling areas. The sampling plan included, at a minimum, the collection and analysis of one (1) paint chip sample from each homogeneous sampling area (Appendix B).

##### **3.1.2 Sample Documentation**

Suspect lead-containing paint samples were collected by carefully removing small portions of paint with a sharp knife or other hand tool suitable for the material being sampled. Each sample was placed in a labeled plastic container immediately after collection. Sample containers were then placed in a large re-sealable plastic bag for transportation to the laboratory. The sampling instrument was wiped with a clean moist cloth to decontaminate the tool and minimize contamination of subsequent samples. For lead paint chip samples collected during the survey, a unique identification numbering system was employed. Data pertinent to each sample (i.e., date, sample number, material description, and material category) was recorded on a field data sheet.

##### **3.1.3 Laboratory Analysis**

Paint chip samples were analyzed by EPA Method 7082 for percent of lead by weight by HAL. HAL participates in the National Environmental Laboratory Accreditation Program (NELAP) and American Industrial Hygiene Association (AIHA) for quality control procedures. Laboratory analytical data reports are provided in Appendix D.

## **4.0 FINDINGS**

The following describes the findings of the survey:

### **4.1 Lead-Containing Paints**

Four (4) paint chip samples were collected as part of this survey. One (1) material was identified with detectable concentrations of lead. Although not applicable to this project, none of the four (4) samples contained concentrations greater than the Department of Housing and Urban Development (HUD) lead based paint classification of 0.5% per weight or 5,000 milligrams/kilogram. Table 1 summarizes the locations of the lead paint chip sampling, color of paint, sample location and the corresponding results. Sample locations are depicted in Figure 2 in Appendix B. Laboratory reports and chain of custody are presented in Appendix D



## 5.0 SUMMARY/CONCLUSIONS

LCP was observed in this assessment (Table 1). The presence and location of LCP must be communicated to contractors bidding on work, contractors performing other work, and employees and tenants in or adjacent to the work area.

OSHA considers any detectable concentration of lead to be a potential hazard during construction activities. Based on the analytical results, lead was detected in paint throughout the Site (Table 1). For work on all building components that have not been tested, they must be considered containing lead. The general contractor performing the renovation should be informed of the presence of lead in the project area. All personnel impacting lead-containing paint (or other lead-containing materials) should be provided additional training concerning the health effects of lead, proper work methods, appropriate use of personnel protective equipment and regulations governing lead exposures.

The contractor must assess the hazard to determine if it will result in personnel exposures. Based on the assessment, and previous similar work and exposure monitoring results, the contractor may have to provide any or all of the following for employees per OSHA 1926.62 and applicable HIOSH regulations:

- Respiratory protection;
- Protective clothing;
- Clean change areas;
- Clean hand-washing facilities;
- Biological monitoring to consist of blood sampling and analysis for lead and zinc protoporphyrin levels; and
- Hazard Communication Training.

Air monitoring to assess lead exposures should be performed for all personnel involved in the renovation process where lead-containing paint may be removed. Initial employee exposure monitoring must be conducted for each separate task involving the handling of lead-containing painted building materials. If 8-hour time-weighted average (TWA) exposures exceed the action level of 30 micrograms of lead per cubic meter of air ( $\text{ug}/\text{m}^3$ ) the contractor must continue to conduct periodic air monitoring at specified intervals, and institute medical surveillance and comprehensive training programs. If the HIOSH/OSHA 8-hour TWA permissible exposure limit of  $50 \text{ ug}/\text{m}^3$  for lead is exceeded, more stringent and additional requirements become effective, such as engineering controls, respiratory protection, regulated work areas and warning signs in lead work areas.

Safe work practices are also recommended for all other materials including:

- Respiratory protection;
- Protective clothing;
- Clean change areas; and
- Clean hand-washing facilities

Report prepared by:

A handwritten signature in black ink, appearing to read 'Rachel Okoji', is written over a horizontal line.

Rachel Okoji

State of Hawaii Certified

Asbestos Building Inspector, Management Planner, Project Designer and Project Monitor

HIASB-2309, Expiration: 09/15/2025

Lead, PB-0014

Risk Assessor, Expiration: 04/20/2027

Project Designer, Expiration: 01/09/2027

Supervisor, Expiration: 08/09/2026

## **TABLES**

**TABLE 1**  
**SUMMARY OF LEAD SAMPLES**

<b>Sample ID</b>	<b>Description</b>	<b>Result (mg/kg)</b>
L-01	Exterior Light Gray Paint on Concrete	< 40
L-02	Exterior Light Green Paint on Concrete	< 40
<b>L-03</b>	<b>Exterior White Paint on Metal Railing</b>	<b>62</b>
L-04	Exterior Light Gray Paint on Concrete Retaining Wall	< 40

Notes:

**BOLD** results indicate a positive detection of lead

## **APPENDIX A**

### **Photographic Documentation**

**Photograph #1**

**Description of Photograph:**

Survey location:

2725 Waimano Home Road

Pearl City, Hawaii 96782

Image taken from Google.

**Date:**

January 17, 2025



**Photograph #2**

**Description of Photograph:**

Sample L-01

Does not contain detectable concentrations of lead.

**Date:**

January 17, 2025



**Photograph #3**

**Description of Photograph:**

Sample L-02

Does not contain detectable concentrations of lead = 62 mg/kg.

**Date:**

January 17, 2025



**Photograph #4**

**Description of Photograph:**

Sample L-03

Does contain detectable concentrations of lead.

White paint on metal railing.

**Date:**

January 17, 2025



**Photograph #5**

**Description of Photograph:**

Sample L-04

Does not contain detectable concentrations of lead.

**Date:**

January 17, 2025





## **APPENDIX B**

### **Figures**



**Site Location Map**  
**2725 Waimano Home Road**  
**Pearl City, Hawaii 96782**

**Figure 1**





**Sample Location Map**  
**2725 Waimano Home Road**  
**Pearl City, Hawaii 96782**

**Figure 2**



## **APPENDIX C**

### **Inspector Certifications**

**State of Hawai'i**  
**Lead Based Paint Activities Certification**

Expiration Dates:

Inspector- n/a  
Supervisor- 08/09/2026  
Risk Assessor- 04/20/2027  
Project Designer- 01/09/2027  
Worker- n/a

**Okoji**

**Rachel**

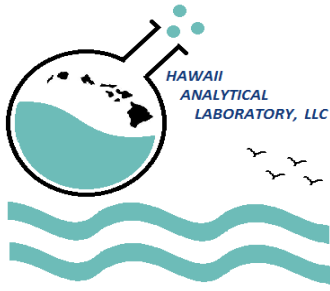
Certification # PB-0014



Lead Risk Assessor  
Rachel Okoji  
PB-0014

## **APPENDIX D**

### **Laboratory Results**



# Hawaii Analytical Laboratory ANALYTICAL REPORT

Friday, January 17, 2025

Environmental Risk Analysis  
905 A Makahiki Way  
Honolulu HI 96826

**Phone Number:** (808)783-6840  
**Email:** rachelokoji@enviroriskhawaii.com;  
russellokoji@enviroriskhawaii.com

**Lab Job No:** 202500427  
**Total Submitted:** 4  
**Date Collected:** 1/17/2025  
**Date Submitted:** 1/17/2025  
**Project Name:** 2725 Waimano Home Road

## Total Lead (paint chips)

NIOSH Method: 7082m LEAD by FAAS

Lab Sple No.	Sample ID / Description	Results	Units	Date Analyzed
202503112	L-01	< 40	mg/kg	1/17/2025
202503113	L-02	< 40	mg/kg	1/17/2025
202503114	L-03	62	mg/kg	1/17/2025
202503115	L-04	< 40	mg/kg	1/17/2025

All Quality Control data are acceptable unless otherwise noted.

Hawaii Analytical Laboratory (101812) is accredited by the AIHA LAP, LLC in the EMLAP, IHLAP, and ELLAP programs for the scope of work listed on [www.aihaaccreditedlabs.org](http://www.aihaaccreditedlabs.org), in accordance with the recognized ISO/IEC 17025:2017. AIHA LAP, LLC is a NLLAP recognized accrediting body. Controlled doc.: Analytical Report, rev. 5 - 20241212

3615 Harding Avenue, Ste. 308, Honolulu, HI 96816 - Telephone: (808) 735-0422 - Fax: (808) 735-0047

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Environmental Risk Analysis  
905 A Makahiki Way  
Honolulu HI 96826

**Phone Number:** (808)783-6840  
**Email:** rachelokoji@enviroriskhawaii.com;  
russellokoji@enviroriskhawaii.com

**Lab Job No:** 202500427  
**Total Submitted:** 4  
**Date Collected:** 1/17/2025  
**Date Submitted:** 1/17/2025  
**Project Name:** 2725 Waimano Home Road

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General Comments

The sample[s] analysis subject of this analytical report were conducted in general accordance with the procedures associated with the "analytical method" referenced above. Modifications to this methodology may have been made based upon the analyst's professional judgment and / or sample matrix effects encountered. The analysis of sample relates only to the sample analyzed, and may or may not be representative of the original source of the material submitted for our analysis. All analysts participate in interlaboratory quality control testing to continuously document proficiency. This report is not to be duplicated except in full without the expressed written permission of Hawaii Analytical Laboratory. This report should not be construed as an endorsement for a product or a service by the AIHA LAP, LLC or any affiliated organizations. Sample and associated sampling / collection data (e.g. air volume or surface area) is reported as provided by client. TWA values have been calculated based on information supplied by the client that the laboratory has not independently verified. Results have not been corrected for blank determinations unless noted in remarks. Unless otherwise indicated the sample condition at the time of receipt was acceptable. MRL for lead air is 5ug; MRL for lead wipe is 5ug; MRL for lead paint or soil is 40 mg/kg for a 0.25g


Results and Symbols Definitions

> This testing result is greater than the numerical value listed.

< This testing result is less than the numerical value listed.

# = Analytical methods marked with an "#" are not within our AIHA LAP, LLC Scope of Accreditation.

MRL = Method Reporting Limit



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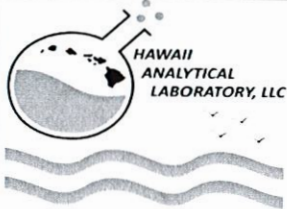
**Jennifer Hsu Liao**  
**Laboratory Manager**

Hawaii Analytical Laboratory (101812) is accredited by the AIHA LAP, LLC in the EMLAP, IHLAP, and ELLAP programs for the scope of work listed on [www.aihaaccreditedlabs.org](http://www.aihaaccreditedlabs.org), in accordance with the recognized ISO/IEC 17025:2017. AIHA LAP, LLC is a NLLAP recognized accrediting body. Controlled doc.: Analytical Report, rev. 5 - 20241212

3615 Harding Avenue, Ste. 308, Honolulu, HI 96816 - Telephone: (808) 735-0422 - Fax: (808) 735-0047

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3615 Harding Avenue, Suite 308  
 Honolulu, HI 96816  
 Ph: 808-735-0422 - Fax: 808-735-0047  
 https://analyzehawaii.com

New Client?

Report To\* :  
 Company : Environmental Risk Analysis LLC  
 Address\* : 905A Makahiki Way  
 Honolulu, Hawaii 96826  
 Phone / Cell No.\* :  
 Report results to :  
 Email / Fax :

Invoice To\* : -SAME-  
 Company :  
 Address\* :  
 Phone / Cell No.\* :  
 Purchase Order No. :  
 Email Invoice To :

**Need Results By\*:**

- 5 Working Days (WD)
- 4 WD
- 3 WD
- 2 WD
- 24 hours
- 6 hours or less
- 4 hours or less
- 1-2 hours

Site/Project Name: 2729 Waimano Home Road Client Project No.: Verbal results?  Sampled By & Certif. #: Rokosi

Special Instructions: PLM POSITIVE STOP Instructions:  
 + stop / SAMPLE  
 + stop / LAYER  
 Lab Report No.: 202500427

Sample ID	Sample Description*	Date Sampled* (mm/dd/yy)	Collection Medium	Sample Area / Air Volume	Analysis Requested*	Method Reference	Lab Sample(s) No.:
1 L-01	Lt Gray - concrete	1/17/25	Bulk	WA	Lead		202503112
2 L-02	Lt Green - concrete						202503113
3 L-03	White - metal						202503114
4 L-04	Lt Gray - concrete retaining wall						202503115
5							
6							
7							
8							
9							
10							
11							
12							

Relinquished By (Print and Sign) [Signature] Date/Time 1/17/25  
 Received By (Print and Sign) Savannah Newman Date/Time 01-17-25 10:25 RCVD

\*Sample description can be paint chips, concrete, specific sample collection location, etc...  
 If matrix is 'soil', please specify if it is a FOREIGN SOIL SAMPLE (outside Hawaii) in the comment section.  
 All samples submitted are subject to Hawaii Analytical Laboratory terms and conditions.  
 \*Required fields, failure to complete these fields may result in a delay in your samples being processed.