

NATIONAL GUARD REGION SOUTH INDUSTRIAL HYGIENE OFFICE 510 PLAZA DRIVE, SUITE 1530 COLLEGE PARK, GA 30349

NGB-ARS-SEIH

September 11, 2008

MEMORANDUM THRU LT. Deputy State Surgeon, Georgia Army National Guard, Medical Command, 5019 Highway 42, Ellenwood, GA 30294.

TO: Mr. Non-Responsive, Georgia Army National Guard, CFMO-Environmental Officer, Post Office Box 437, Hinesville, GA 31315-5066.

SUBJECT: Albany National Guard Armory, Lead Sampling Survey, Albany, Georgia.

1. References.

- a. Department of Defense Instruction 6055.1, Department of Defense Occupational Safety and Health (OSH) Program, 26 October 1984.
- b. Army Regulation (AR) 40-5, Medical Service, Preventive Medicine, 22 August 2005.
- c. National Guard Regulation (NGR) 385-10, Army National Guard Safety and Occupational Health Program, 1988.
- d. AR 385-10, The Army Safety Program, 29 February 2000.
- e. NGR Pam 420-15, Guidelines and Procedures for Rehabilitation and Conversion of Indoor Firing Ranges, 3 November 2006.
- f. NGR 385-15, Policy and Responsibilities, Evaluation and Operation of Army National Guard Indoor Firing Ranges, 3 November 2006.
- g. DA PAM 40-503, The Army Industrial Hygiene Program, 30 October 2000.
- h. Threshold Limit Values and Biological Exposure Indices (TLV's) for 2003, American Conference of Governmental Industrial Hygienists (ACGIH), Cincinnati, Ohio.
- i. Industrial Ventilation, 23rd Edition, American Conference of Governmental Industrial Hygienist, Cincinnati, Ohio.
- j. Title 29, Code of Federal Regulations (CFR), 2001 rev., part 1910, Occupational Safety and Health Standards.

2. General.

- a. As requested by, Georgia Occupational Health Office, personnel with the National Guard Region South Office performed a visual inspection at the referenced site. The apparent objective of the inspection was to collect surface wipe samples from the former Indoor Firing Range (IFR) for analysis of total lead to confirm/deny the presence of lead dust at concentrations above regulatory standards.
- b. Sergeant (SGT Non-Responsive with the National Guard Region South Industrial Hygiene Office in College Park Georgia performed the site visit.

3. Findings.

General Information

On August 25, 2008, a site visit was conducted and at the time of the sampling activity, the interior of the former IFR appeared to have undergone conversion to a training/classroom. The flooring was observed to be covered with carpet and there was a drop ceiling present completed with 2 feet by 2 feet acoustical ceiling panels. Painted brick walls were observed and there were offices constructed in the area identified as the former location of the bullet stop. There was however exposed concrete flooring and original ceiling materials observed inside the electrical room and telecom rooms inside the converted IFR. As a result of the renovated room, sampling locations were limited to exposed wall surfaces, concrete flooring and ceiling materials in the electrical room.

Sampling Activities

Based on the number of surfaces observed, samples were collected in accordance with NG Pam 420-15. Lead dust samples were collected using Ghost Wipes[™] which are premoistened media made of non-woven polyvinyl alcohol fiber and approved by American Industrial Hygiene Association (AIHA) for lead sampling. The wipes also meet all American Standards Testing Materials (ASTM) Designation E1792-96E specifications for sampling materials for lead in surface dust.

The surface samples were collected by SGT using a 1 square foot sampling template placed on the surface area identified for sampling. The area within the template was wiped using a new Ghost WipeTM. After the area inside the template was wiped, the sampling media was placed into a labeled re-sealable plastic bag and sealed. After each sample collection, a new surface area template was used and new disposable gloves were donned. A total of 14 samples were collected from each exposed surface area of the former IFR and there were no samples collected from the wall adjacent to the former bullet stop due to the offices constructed at that location. Collected samples were submitted to Analytical Environmental Services, Inc. (AES) in Atlanta, Georgia for subsequent analysis of total lead. In addition, one wipe sample was placed into a re-sealable bag and submitted as field blank samples for analysis.

NGB-ARS-SEIH

SUBJECT: Lead Sampling Survey, Albany Armory, Albany, Georgia.

Laboratory Results

The laboratory results did not indicate the presence of lead concentrations above the IFR post cleaning standard of 200micrograms per feet squared ($\mu g/ft^2$). These sampling results indicate that any previous decontamination activities appear to be adequate to remove the lead dust from the former range at acceptable levels. It should be noted that the sampling activities were completed in a former IFR which has undergone conversion/renovation.

The results of the lead dust sampling activities are summarized in the following table.

Sample Number	Sample Location	Laboratory Results
<u>AL-01</u>	Lower Right Wall	BRL ²
AL-02	Middle Right Wall	BRL
AL-03	Upper Right Wall	BRL
AL-04	Lower Left Wall	BRL
AL-05	Middle Left Wall	BRL
AL-06	Upper Rear Wall	BRL
AL-07	Floor, Electrical Room	BRL
AL-08	Floor, Telecom Room	BRL
AL-09	Floor Outside Former Bullet Stop	BRL
AL-10	Ceiling, Electrical Room	BRL
AL-11	Ceiling, Telecom Room	BRL
AL-12	4-Drawer Wooden File Cabinet	BRL
AL-13	4-Drawer Metal File Cabinet	BRL
AL-14	Field Blank	BRL

¹ Results reported in micrograms per square feet (µg/ft²)

² BRL = Below Reportable Limits

The laboratory report, including the Chain of Custody record is attached for review.

4. Recommendations.

- a. In as much as the former IFR at the Albany Armory has been converted to a training room, it appears that lead dust is not present at concentrations above the NGB standard. It should be noted that the sampling activities were limited to exposed areas observed inside the former IFR.
- b. In accordance with NGB Pamphlet 420-15, continue lead testing on an annual basis to verify that lead has not migrated from the substrate. The annual sampling shall include areas of the ceiling, walls and floors. Following the annual sampling event, if lead concentrations are less than 200 μ g/ft², the walls of the former IFR shall be coated with a lead dust encapsulant. Conventional paint can not be used as an encapsulant. It should be noted that the referenced guidance document does not address coating the ceiling. However, it appears that the presence of the drop ceiling with acoustical ceiling panels would be sufficient barrier to prevent potential lead migration and exposure.

5. If additional information is needed about the contractors report, please contact SGT Non-Responsive Regional Industrial Hygiene Technician, 1-800-362-0262 OR COMMERCIAL (404) 559-4174.



Regional Industrial Hygienist

CF: Georgia Army National Guard, ATTN: LTNon-Responsive, Deputy State Surgeon Office, 5019 Highway 42, Ellenwood, GA 30294.

CF: State Safety Office, GA, ATTN: MAJ. Non-Responsive Safety and Occupational Health Manager, 1388 1st Street, Building 840, Dobbins ARB, GA 30069.

CF: Georgia Department of Defense, ATTN: Mr. Non-Responsive CFMO-ENV Building 21, 935 E. Confederate Avenue, SE, Atlanta, GA 30316.

CF: Georgia Department of Defense, ATTN: Mr^{Non-Responsive} Facilities Maintenance Manager, Building 12, 935 E. Confederate Avenue, SE, Atlanta, GA 30316.

BEST AVAILABLE COPY



ANALYTICAL ENVIRONMENTAL SERVICES, INC.

September 05, 2008

Non-Responsive

National Guard Bureau Region-South III 510 Plaza Drive, Suite 1530 Suite 1530 College Park, GA 30349

TEL: (404) 559-4174 FAX: (404) 559-4175

RE: Albany Armory

Dear Non-Responsive

Order No.: 0808K23

Analytical Environmental Services, Inc. received 14 samples on 8/29/2008 3:15:00 PM for the analyses presented in the following report.

No problems were encountered during the analyses. Additionally, all results for the associated Quality Control samples were within EPA and/or AES established limits. Any discrepancies associated with the analyses contained herein will be noted and submitted in the form of a project Case Narrative.

AES' certifications are as follows:

-NELAC/Florida Certification number E87582 for analysis of Environmental Water, soil/hazardous waste, and Drinking Water Microbiology, effective 07/01/08-06/30/09. -AIHA Certification ID #100671 for Industrial Hygiene samples (Organics, Inorganics), Environmental Lead (Paint, Soil, Dust Wipes, Air), and Environmental Microbiology (Fungal) effective until 08/01/09.

These results relate only to the items tested. This report may only be reproduced in full and contains 4 total pages (including cover letter).

If you have any questions regarding these test results, please feel free to call.



Project Manager

3785 PRESIDENTIAL PARKWAY • ATLANIA, GEORGIA 30340 • TEL: (770) 457-8177 • FAX: (770)457-8188

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ANAL YTICAL ENVIRONMENTAL SERVICES, INC 3785 Pre-Jial Parkway, Atlanta GA 30340-3704 TEL.: (770)457-8177 / TOLL-FREE (800) 972-4889 / FAX: (770)457-8188

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Analytical Environmental Services, Inc.

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Sample/Cooler Receipt Checklist

Client GA Arry		Work Order Number	0808123
Checklist completed by SignatureD	81301¥ ate		
Carrier name: FedEx UPS Courier Client	US Mail Othe	r	
Shipping container/cooler in good condition?	Yes	No Not Present	-
· · · · ·		No Not Present	
Custody seals intact on sample bottles?	Yes	No Not Present	\leq
Container/Temp Blank temperature in compliance? (4°CE2			
Cooler #1 Ambiant Cooler #2 Cooler #3	Cooler #4	Cooler#5	Cooler #6
Chain of custody present?	Yes	No	
Chain of custody signed when relinquished and received?	Yes	No	
Chain of custody agrees with sample labels?	Yes	No	
Samples in proper container/bottle?	Yes	No	
Sample containers intact?	Yes	No	
Sufficient sample volume for indicated test?	Yes	No	
All samples received within holding time?	Yes	No	
Was TAT marked on the COC?	Yes	No	
Proceed with Standard TAT as per project history?	Yes	No Not Appli	cable
Water - VOA vials have zero headspace? No VOA vials	s submitted	Yes No _	
Water - pH acceptable upon receipt?	Yes	No Not Appli	cable
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Sample Condition: Good Other(Explain) (For diffusive samples or AlHA lead) Is a known blank inc			

See Case Narrative for resolution of the Non-Conformance.

* Samples do not have to comply with the given range for certain parameters

MAQuality Assurance/Checklists Procedures Sign-Off Templates Checklists/Sample Receipt Checklists/Sample, Cooler [Receipt] Checklist

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Analytical Environmental Services, Inc.

Date: 9/5/2008

LEAD ON WIPES (N9100/7082) N7082

CLIENT:	National Guard Bureau Region-South IH	Lab Order:	0808K23
Project:	Albany Armory	Date Received:	8/29/2008 3:15 PM
Delivery Orde	er:	Matrix:	Wipe
DO No.			· · · ·

PO No:

Laboratory	Client Sample	Results	Units	Report	DF	Date	Date	Analyst
ID	ID			Limit.		Collected	Analyzed	
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0808K23-002A	AL-02	BRL	µg∕ft²	20	l	8/25/2008	9/4/2008	TAA
0808K23-003A	AL-03	BRL	µg/ft²	20	1	8/25/2008	9/4/2008	TAA
0808K23-004A	AL-04	BRL	µg∕ft²	20	1	8/25/2008	9/4/2008	TAA
0808K23-005A	AL-05	BRL	µg/ft²	20	l	8/25/2008	9/4/2008	TAA
0808K23-006A	AL-06	BRL	μg/ft²	20	1	8/25/2008	9/4/2008	TAA
0808K23-007A	AL-07	BRL	μg/ft²	20	1	8/25/2008	9/4/2008	TAA
0808K23-008A	AL-08	BRL	μg/ft²	20	1	8/25/2008	9/4/2008	TAA
0808K23-009A	AL-09	BRL	μg/ft²	20	1	8/25/2008	9/4/2008	TAA
0808K23-010A	AL-10	BRL	μg/ft²	20	1	8/25/2008	9/4/2008	TAA
0808K23-011A	AL-11	BRL	μg/ft²	20	1	8/25/2008	9/4/2008	TAA
0808K23-012A	AL-12	BRL	μg/ft²	20	1	8/25/2008	9/4/2008	TAA
0808K23-013A	AL-13	BRL	μg/ft²	20	L	8/25/2008	9/4/2008	TAA
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Qualifiers:

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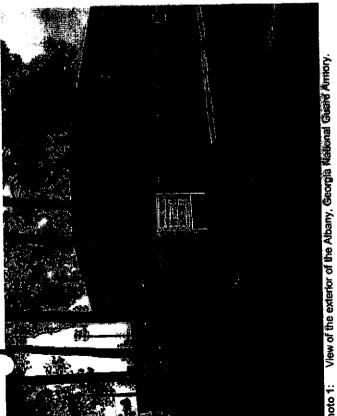
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Date Photos Taken: 25 August 2008

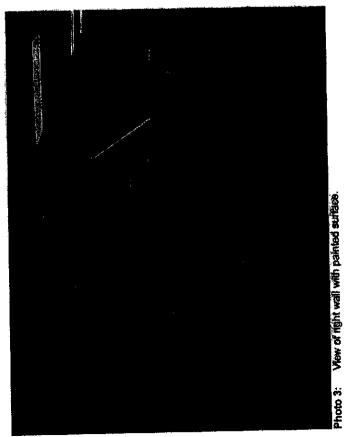
View of this diffice walls constructed at the former builet trap location. View of this wall with particle Surface histor the former IFR. Photo 4: 12 00 00 Ju



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ALC: STREAM STREAM

Photo 1:

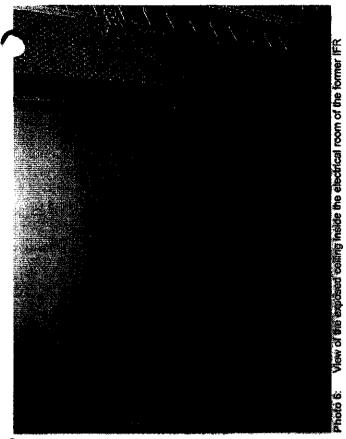


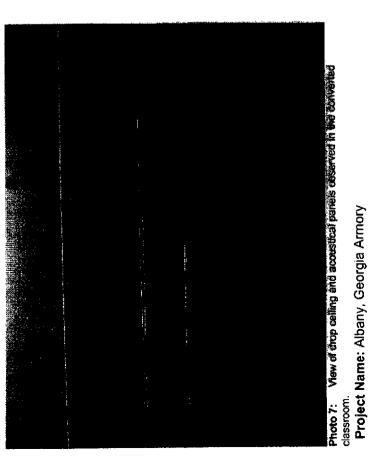
Project Name: Albany, Georgia Armory

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View of the carpet covered hoor of the formar IFR.

Photo 5:





FOIA Requested Record #J-15-0085 (GA) Released by National Guard Bureau Page 10 of 378



NATIONAL GUARD REGION SOUTH INDUSTRIAL HYGIENE OFFICE 510 PLAZA DRIVE, SUITE 1530 COLLEGE PARK, GA 30349

NGB-ARS-SEIH

September 11, 2008

MEMORANDUM THRU LT. Deputy State Surgeon, Georgia Army National Guard, Medical Command, 5019 Highway 42, Ellenwood, GA 30294.

TO: Mr. Non-Responsive Georgia Army National Guard, CFMO-Environmental Officer, Post Office Box 437, Hinesville, GA 31315-5066.

SUBJECT: Bainbridge National Guard Armory, Lead Sampling Survey, Bainbridge, Georgia.

1. References.

- a. Department of Defense Instruction 6055.1, Department of Defense Occupational Safety and Health (OSH) Program, 26 October 1984.
- b. Army Regulation (AR) 40-5, Medical Service, Preventive Medicine, 22 July 2005.
- c. National Guard Regulation (NGR) 385-10, Army National Guard Safety and Occupational Health Program, 1988.
- d. AR 385-10, The Army Safety Program, 29 February 2000.
- e. NGR Pam 420-15, Guidelines and Procedures for Rehabilitation and Conversion of Indoor Firing Ranges, 3 November 2006.
- f. NGR 385-15, Policy and Responsibilities, Evaluation and Operation of Army National Guard Indoor Firing Ranges, 3 November 2006.
- g. DA PAM 40-503, The Army Industrial Hygiene Program, 30 October 2000.
- h. Threshold Limit Values and Biological Exposure Indices (TLV's) for 2003, American Conference of Governmental Industrial Hygienists (ACGIH), Cincinnati, Ohio.
- i. Industrial Ventilation, 23rd Edition, American Conference of Governmental Industrial Hygienist, Cincinnati, Ohio.
- j. Title 29, Code of Federal Regulations (CFR), 2001 rev., part 1910, Occupational Safety and Health Standards.

NGB-ARS-SEIH SUBJECT: Lead Sampling Survey, Bainbridge Armory, Bainbridge, Georgia.

2. General.

- As requested by, Georgia Occupational Health Office, personnel with the a. National Guard Region South Office performed a visual inspection at the referenced site. The apparent objective of the inspection was to collect surface wipe samples from the former Indoor Firing Range (IFR) for analysis of total lead to confirm/deny the presence of lead dust at concentrations above regulatory standards.
- b. Sergeant (SGT Non-Responsive with the National Guard Region South Industrial Hygiene Office in College Park Georgia performed the site visit.

3. Findings.

General Information

On August 25, 2008, a site visit was conducted and at the time of the sampling activity, the interior of the former IFR appeared to have undergone conversion to a training/classroom. The flooring was observed to be covered with carpet and there was a drop ceiling present completed with two feet by two feet acoustical ceiling panels. The walls of the former IFR were observed to be painted sheetrock, with several offices constructed in the area identified as the former location of the bullet stop. There was however exposed concrete flooring and original ceiling materials observed inside the electrical room located at the rear of the converted IFR. As a result of the renovation, sampling locations were limited to exposed concrete floor surfaces and ceiling materials in the electrical room.

Sampling Activities

Based on the number of surfaces observed, samples were collected in accordance with NG Pam 420-15. Lead dust samples were collected using Ghost Wipes[™] which are premoistened media made of non-woven polyvinyl alcohol fiber and approved by American Industrial Hygiene Association (AIHA) for lead sampling. The wipes also meet all American Standards Testing Materials (ASTM) Designation E1792-96E specifications for sampling materials for lead in surface dust.

The surface samples were collected by SGT using a 1 square foot sampling template placed on the surface area identified for sampling. The area within the template was wiped using a new Ghost Wipe[™]. After the area inside the template was wiped, the sampling media was placed into a labeled re-sealable plastic bag and sealed. After each sample collection, a new surface area template was used and new disposable gloves were donned. A total of 5 samples were collected due to the limited surface areas. Collected samples were submitted to Analytical Environmental Services, Inc. (AES) in Atlanta, Georgia for subsequent analysis of total lead. In addition, one wipe sample was placed into a re-sealable bag and submitted as field blank samples for analysis.

Laboratory Results

The laboratory results did not indicate the presence of lead concentrations above the IFR post cleaning standard of 200micrograms per feet squared (µg/ft²). It should be noted that the sampling activities were completed in a former IFR which has undergone conversion/renovation and the floors, walls and ceiling of the former IFR were concealed with carper, sheetrock and acoustical tiles, respectively. The presence of these building SUBJECT: Lead Sampling Survey, Bainbridge Armory, Bainbridge, Georgia.

materials limited the surface sampling activities. However the materials also serve as barriers which could prevent potential exposure to lead dust via migration from the substrate.

Sample Number	Sample Location	Laboratory Results ¹
BA-01	Exposed Concrete Floor, Electrical Room	BRL ²
BA-02	Exposed Concrete Floor, Telecom Room	BRL
BA-03	Exposed Ceiling, Electrical Room	27
BA-04	Exposed Ceiling, Telecom Room	BRL
BA-05	Field Blank	BRL

The results of the lead dust sampling activities are summarized in the following table.

¹ Results reported in micrograms per square feet (µg/ft²)

² BRL = Below Reportable Limits

The laboratory report, including the Chain of Custody record is attached for review.

4. Recommendations.

- a. In as much as the former IFR at the Bainbridge Armory has been converted to a training/class room, it appears that exposure to lead dust would be minimized as a result of the building materials present. It should be noted that the sampling activities were limited to exposed areas observed inside the former IFR.
- b. The guidance document NGB Pamphlet 420-15 recommends annual sampling to verify that lead has not migrated from the substrate. However, it appears that the presence of the carpet, sheetrock and drop ceiling with acoustical ceiling panels would be sufficient barrier to prevent potential lead migration and exposure.
- c. Monitor the conditions of the building materials to ensure that these materials remain free of damage and if these materials become damaged, perform repairs as soon as reasonably possible to prevent potential exposure to lead dust.

5. If additional information is needed about the contractors report, please contact SGT Non-Responsive Regional Industrial Hygiene Technician, 1-800-362-0262 OR COMMERCIAL (404) 559-4174.



3 BEST AVAILABLE COPY SUBJECT: Lead Sampling Survey, Bainbridge Armory, Bainbridge, Georgia.

CF: Georgia Army National Guard, ATTN: LT Non-Responsive Deputy State Surgeon Office, 5019 Highway 42, Ellenwood, GA 30294.

CF: State Safety Office, GA, ATTN: MAJ. Non-Responsive Safety and Occupational Health Manager, 1388 1st Street, Building 840, Dobbins ARB, GA 30069.

CF: Georgia Department of Defense, ATTN: Mr. Non-Responsive CFMO-ENV Building 21, 935 E. Confederate Avenue, SE, Atlanta, GA 30316.

CF: Georgia Department of Defense, ATTN: Mr. Non-Responsive Facilities Maintenance Manager, Building 12, 935 E. Confederate Avenue, SE, Atlanta, GA 30316.

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ANALYTICAL ENVIRONMENTAL SERVICES, INC.

September 04, 2008

Non-Responsive

National Guard Bureau Region-South IH 510 Plaza Drive, Suite 1530 Suite 1530 College Park, GA 30349

TEL: (404) 559-4174 FAX: (404) 559-4175

RE: Bainbridge Armory

Dear Non-Responsive

Order No.: 0809005

Analytical Environmental Services, Inc. received 5 samples on 8/29/2008 3:15:00 PM for the analyses presented in the following report.

No problems were encountered during the analyses. Additionally, all results for the associated Quality Control samples were within EPA and/or AES established limits. Any discrepancies associated with the analyses contained herein will be noted and submitted in the form of a project Case Narrative.

AES' certifications are as follows:

-NELAC/Florida Certification number E87582 for analysis of Environmental Water, soil/hazardous waste, and Drinking Water Microbiology, effective 07/01/08-06/30/09. -AIHA Certification ID #100671 for Industrial Hygiene samples (Organics, Inorganics), Environmental Lead (Paint, Soil, Dust Wipes, Air), and Environmental Microbiology (Fungal) effective until 08/01/09.

These results relate only to the items tested. This report may only be reproduced in full and contains ______ total pages (including cover letter).

If you have any questions regarding these test results, please feel free to call.



Project Manager

3785 Presidential Parkway • Atlanta, Georgia 30340 • Tel: (770) 457-8177 • FAX: (770) 457-8188

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ANALYTICAL ENVIRONMENTAL SERVICES, INC 3785 Presi M Parkway, Atlanta GA 30340-3704	VES THER: (770) 457-8177 / TOLL-FREE (800) 972-4889 / FAX: (770) 457-8188	Rea, by Suffy IH OF CC				n-Respons	ľ	, FTD															DATE TIME	leg	9				15				AAVPLES RECEIVED AFTER 3PM OR SATT RDAY ARE CONSIDERED AS RECEIVED ON THIS NEXT BUSINESS DAY; IF NO TAT IS MARKED ON COC AES WILL PROCEED AS STANDARD TAT. SAMPLES ARE DISPOSED OF 30 DAYS AFTER COMPLETION OF REPORT COLESS OTHER ARRANGEMENTS ARE MADE.	AAAAKINAAANASA A An AW droundwater SE Sediment SO Soil SW = Surface Water W= Water (Blanks) DW = FNI SCKVAEIVEO (2012) Hot - Hydrochloric and the order N= Nature and SH = Sufface and + we SAP1 - Sedium 1
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Analytical Environmental Services, Inc.

Sample/Cooler Receipt Checklist

Client G.A. Army		Work Ord	er Number 08091005
Checklist completed by Signature Date	1/2/08		
Carrier name: FedEx UPS Courier Client	S Mail Othe	ar	
Shipping container/cooler in good condition?	Yes (No	Not Present
Custody seals intact on shipping container/cooler?	Ycs	No	Not Present
Custody seals intact on sample bottles?	Yes	No	Not Present
Container/Temp Blank temperature in compliance? (492+2)	Yes	No	
Cooler #1 Ambientcooler #2 Cooler #3	Cooler #4	Co	oler#5 Cooler #6
Chain of custody present?	Yes	No	
Chain of custody signed when relinquished and received?	Yes	No	
Chain of custody agrees with sample labels?	Yes	No _	
Samples in proper container/bottle?	Yes	No	
Sample containers intact?	Yes	No	
Sufficient sample volume for indicated test?	Yes	No	
All samples received within holding time?	Yes	No	
Was TAT marked on the COC?	Yes	No	
Proceed with Standard TAT as per project history?	Yes	No	Not Applicable
Water - VOA vials have zero headspace? No VOA vials su	ubmitted	Yes	No
Water - pH acceptable upon receipt?	Yes	No	Not Applicable
Adjusted?	Che	cked by	
Sample Condition: Good Condition: Good			
(For diffusive samples or AIHA lead) Is a known blank include	ied? Yes	1	No

See Case Narrative for resolution of the Non-Conformance.

* Samples do not have to comply with the given range for certain parameters

MQuality Assurance Checklists Procedures Sign-Off Templates Checklists Sample Receipt Checklists Sample Cooler Receipt Checklist

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Analytical Environmental Services, Inc.

Date: 9/4/2008

LEAD ON WIPES (N9100/7082) N7082

CLIENT:	National Guard Bureau Region-South IH	Lab Order:	0809005
Project:	Bainbridge Armory	Date Received:	8/29/2008 3:15 PM
Delivery Orde	r:	Matrix:	Wipe
DO N.			

PO No:

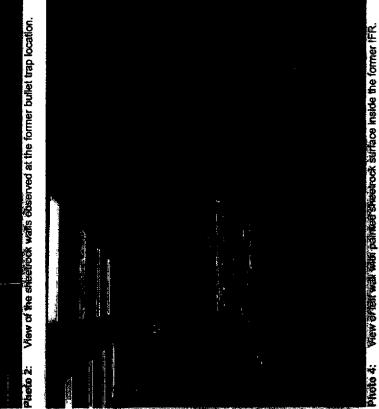
Laboratory	Client Sample	Results	Units	Report	DF	Date	Date	Analyst
ID	١D			Limit.		Collected	Analyzed	
0809005-001A	BA-01	BRL	μg/ft²	20	1	8/25/2008	9/3/2008	TAA
0809005-002A	BA-02	BRL	μg/ft²	20	1	8/25/2008	9/3/20 08	TAA
0809005-003A	BA-03	27	μg/ft²	20	1	8/25/2008	9/3/2008	TAA
0809005-004A	BA-04	BRL	μg/ft²	20	1	8/25/2008	9/3/2008	TAA
0809005-005A	BA-05	BRL	ug, Total	20	1	8/25/2008	9/3/2008	TAA

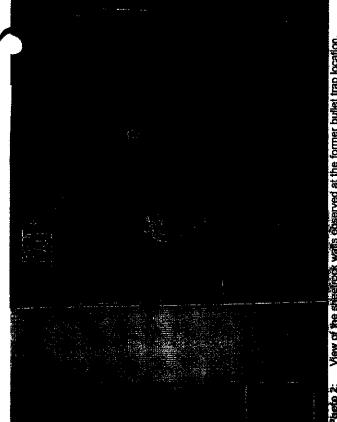
Qualifiers:

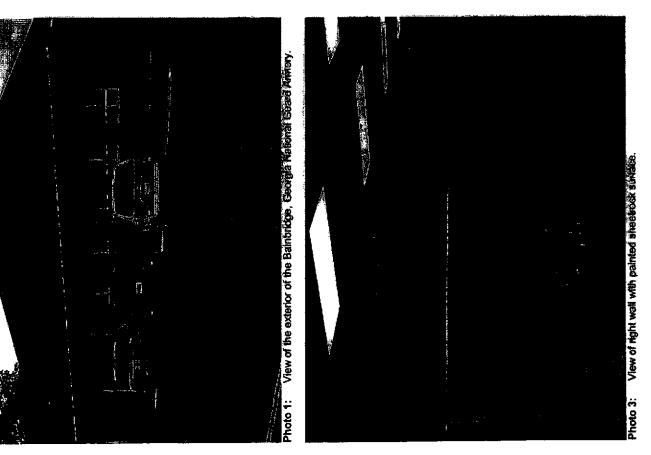
BRL - Not Detected at the Reporting Limit

Date Photos Taken: 25 August 2008

Project Name: Bainbridge, Georgia Armony





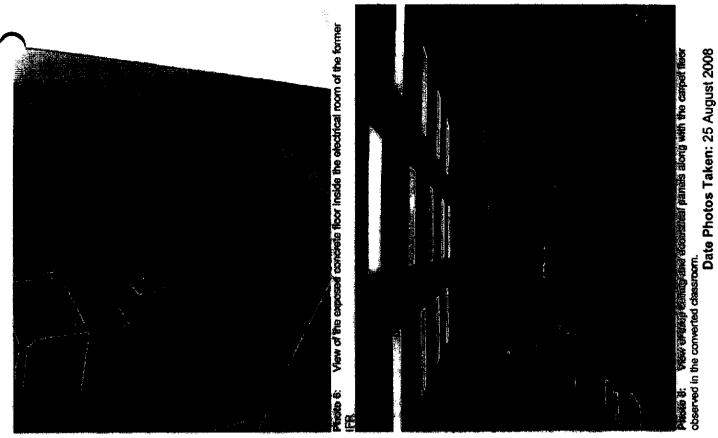


FOIA Requested Record #J-15-0085 (GA) Released by National Guard Bureau Page 19 of 378

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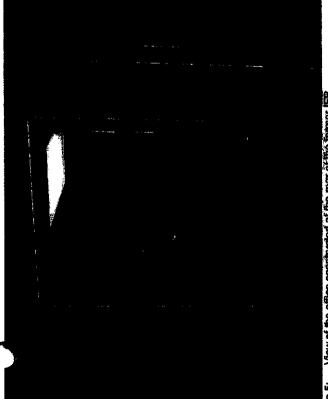
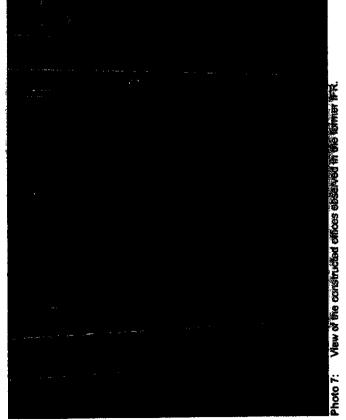


Photo 5: View of the office constructed at the rear of the former IFR.



Project Name: Bainbridge, Georgia Armory

FOIA Requested Record #J-15-0085 (GA) Released by National Guard Bureau Page 20 of 378

NATIONAL GUARD REGION SOUTH INDUSTRIAL HYGIENE OFFICE 510 PLAZA DRIVE, SUITE 1530 COLLEGE PARK, GA 30349

NGB-AVN-SI

December 19, 2003

MEMORANDUM FOR THE Georgia Army National Guard, ATTN: LTC Non-Responsive Safety and Occupational Health Manager, P.O. 5019 Highway 42, Ellenwood, GA 30294.

SUBJECT: Industrial Hygiene Asbestos and Lead sampling of the Barnesville National Guard Armory which is currently being used as the Lamar County Activity Center, Inc.

1. References.

a. OSHA Standards 29 CFR (Code of Federal Regulations), General Industry, revised 2001 rev.

b. AR 40-5, Preventive Medicine, 15 October 1990.

c. AR 11-34, 15 February 1990, The Army Respiratory Protection Program.

d. AR 385-10, 29 February 2000, Army Safety Program.

e. Department of the Army Pamphlet (DA PAM) 40-501, 10 December 1998, Hearing Conservation.

f. TB MED 503, The Army Industrial Hygiene Program.

g. Title 29 Code of Federal regulation (CFR), 2001 rev, Part 1910.94 (c) (6) Table G-10, Ventilation.

h. Industrial Ventilation, 23rd, 1998, American Conference of Governmental Industrial Hygienist, Cincinnati, Ohio.

i. Title 29 Code of Federal regulation (CFR), Part 1910.1025 Lead

j. Title 29 Code of Federal regulation (CFR), Part 1910.1001 Asbestos

k. DA PAM 385.15, "Policy, Responsibility and Guidelines for Housekeeping, Rehabilitation and/or conversion of Indoor Firing Ranges."

1. DA PAM 385.16, Guidelines for converting Indoor Firing Ranges to other uses.

2. General.

a. At the request of Ms. Non-Responsive of the Georgia Safety and Occupational Health Office, an Industrial Hygiene baseline survey was conducted at the Lamar County Activity Center, Inc, which was formally a National Guard Armory.

b. The major concern was the possibility of asbestos and lead exposure to children. The Lamar County Activity Center provides the community with after school youth educational and entertainment activities. The activity center was also in the process of opening a day care center.

Non-Responsive and sampling was conducted by Mr. Non-Responsive Ms. Management of the Region South Industrial Hygiene Office.

3. Findings. The following are sample results taken:

September 24, 2003 Sample

Sample MKF-5000 ceiling insulation sampled for possible Asbestos

none detected

September 30, 2003 Samples

Asbestos Air/bulk samples

	0.002 f/cc
Sample 5012 taken in the Gym at the following locations- exercise area	0.003 f/cc
	0.000 f/cc
	0.001 f/cc
Sample 5018 taken in the Gym at the following locations- Backroom	0.002 f/cc
Sample 5019 taken in the Gym at the following locations- Gym Floor	0.002 f/cc
Sample 5040 Auditorium broken floor tile next to kitchen door n	one detected
Sample 5037 Bldg B unrenovated classroom ceiling tile n	one detected
Sample 5035 Bldg B unrenovated classroom floor tile/mastic 59	% chrysotile
	% chrysotile

Lead soil and swipe samples

Sample MKF 5033	Soil from NE corner of playground	954 ppm
Sample MKF 5030	swipe taken from large toy slide in playground	BRL
Sample MKF 5031	swipe taken from small toy slide in playground	BRL
Sample MKF 5038	Bldg B unrenovated hallway wall peeling paint	BRL

Renovated classroom/hallway area Lead swipe samples

Sample CR0201	top of cabinet in back of classroom near winde	w BR	L
Sample CR0202	top of cabinet in front of classroom near door	32 microgra	ms/sq ft
Sample CR0301	top of cabinet in back of classroom	48 microgram	
Sample CR0302	top of cabinet in front of classroom near door	32 microgram	
Sample CR0B01	top of cabinet in front of classroom near door	33 microgram	
Sample CR0B02		25 microgra	
Sample HW001	Hallway floor in front of double doors leading	to classroom	BRL
Sample HW002	Hallway floor across from #4 classroom A und	er fuse box	BRL
Sample HW003	Hallway floor directly outside of Janitor's close	et	BRL

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Gym area/Bldg B classroom Lead swipe samples

Sample Gym01	window sill at top of bleaches at center court 198 n	nicrograms/sq ft
Sample Gym02	5 th step of bleachers near back left exit of gym	BRL
Sample Gym03	top of table to the right of main entrance	BRL
Sample Gym04	bottom shelf of ball storage to the right of main entrance	BRL
Sample Gym05	floor in middle of exercise equipment	BRL
Sample Gym06	floor center court of basketball court	BRL
Sample 20	inside cabinet	BRL
Sample 21	middle of 1 st window near vent system	BRL
Sample 22	inside door, 3 & 4 year old room	BRL
Sample 24	green blackboard 3 & 4 year old room	BRL
Sample 25	top of brow cabinet class room #4, 6 & 7 grade room	BRL
Sample 26	top of bookshelf, back of room, 6 & 7 grade room	BRL
Sample 27	top of room cabinet, front of room, infants & toddlers	BRL
Sample 28	top of cabinet in back corner of infant & toddlers room	BRL

Auditorium area Lead swipe samples

Sample ACS01	auditorium center back of stage	BRL
Sample ACS02	top left of piano	BRL

Learning Center area Lead swipe samples

Sample LC001	top of coffee table in learning center	BRL
Sample LC002	top of locker in back room	136 total micrograms

Thrift store area Lead swipe samples

Sample TS001	front wall of former arms room	BRL
	lower right wall of former arms room	BRL
	rear wall of former arms room	BRL
Sample TS004	back left corner floor of former arms room	BRL
	front right corner floor under desk of former arms room	BRL
	floor outside door of former arms room	BRL
Sample TS007	arms room door, top of key box	BRL

Lead air samples

Sample MKF5004	The following Lead air samples were taken	< 0.200
Sample MKF5005	throughout the day care classrooms	< 0.200
Sample MKF5002		< 0.200
Sample MKF5001		< 0.200
Sample MKF5003		< 0.200
Blank 002		< 0.200
Sample MKF5000		< 0.200
Sample MKF5006		< 0.200
Sample MKF5009		< 0.200
Sample MKF5007		< 0.200
Sample MKF5008		< 0.200
Blank 001		< 0.200
Sample MKF5015		< 0.200
Sample MKF5013		< 0.200
Sample MKF5016		< 0.200

Sample MKF5011 Blank 003 <0.200 <0.200

Gym Bulk Lead Samples

Sample DH01	taken in hallway before shower	0.222%
Sample DH02	taken on side wall in back of Gym	0.110%
Sample DH03	taken on pool table and floor	unknown result
Sample DH04	taken in high school classroom	BRL
Sample DH05	taken on blue bleaches in Gym	0.132%
Sample DH06	taken form window sill	0.009%
Sample DH07	taken off the floor	BRL

October 16, 2003 Samples

Playground soil samples

Sample MKF6000- NE side of playground near bldg A	13.9 ppm
Sample MKF6001- SE side of playground near bldg B	13.2 ppm
Sample MKF6002- Center of playground	11.0 ppm
Sample MKF6003- NW corner of playground near bldg A	15.4 ppm
Sample MKF6004- SW corner of playground near bldg B	9.89 ppm
Sample MKF6005- outside of playground, left of door and bldg B	9.74 ppm

Bulk Lead Samples

Sample MKF6006 paint chip unrenovated side Bldg B, off electrical panel wall 0.0357% Sample MKF6007 paint chip unrenovated side Bldg B, classroom door 0.839%

After school/Day care area lead swipe samples

Sample 6001 3 rd window from right, window sill right corner	BRL
Sample 6002 last window from right corner of sill	BRL
Sample 6003 1 st window from right, middle of window sill	BRL
Sample 6004 5 th window from right, right side of sill	BRL
Sample 6005 2 nd window from right, right side of sill	BRL
Sample 6006 last window from right, right side of sill	BRL
Sample 6007 2 nd vent facing door right side of room	BRL
Sample 6008 2 nd window from right, left side of sill	BRL
Sample 6009 5 th window from right, middle of sill 2	20 micrograms/sq ft
Sample 6010 2 nd window from right, left side of sill	BRĽ
Sample 6011 5 th window from right, middle of sill	BRL
Sample 6012 3 rd window from right, middle of sill	BRL
Sample 6013 last window from right, sill behind sink	BRL
Sample 6014 2 nd visible window from right, right corner of sill	33 micrograms/sq ft
Sample 6015 4 th visible window from right, middle of sill	BRL

4. Discussion. The Barnesville Armory and surrounding campus was originally opened in the mid 1950's as a six building middle/high school. In 1971 the school was turned into an elementary school. In and around 1989 the National Guard acquired the school and surrounding grounds. The National Guard maintained procession of the campus until 2001 when the Lamar County Activity Center took over the campus. The Lamar County Activity Center use half of building B as classrooms and a soon to open daycare. The half being used has been renovated with the un renovated half separated by a wall. Building D is the current Administration area and a Thrift Store. While being used by the National Guard, building D contained an arms room. Building E is being used as an Auditorium, Kitchen and a learning center. There are storage areas in building E where items left by the guard are held.

It was explained that building A has not been used by the Lamar County Activity Center and it was indicated that the Guard did not use building A either. Building C is currently used by the Department of Natural Resources and is off limits to staff and all children. There is a Gymnasium on the campus that is kept locked. (See enclosure 1.)

Asbestos and specifically lead sampling was conducted in the buildings because of the possible hazard to children who are now occupying some of the buildings.

5. Conclusion. All collected industrial Hygiene Lead and Asbestos samples revealed no over exposures to the children of the Lamar County Activity Center. Asbestos levels exceeding the permissible exposure limit were found in the floor tile/mastic in the un renovated section of building B. Lead levels were very close to being over the permissible exposure limit at a window sill in the Gymnasium. One soil sample collected 30 September 2003 for lead in the NE corner of the playground dictate that further soil samples be taken to ensure correct results as dictated by proper sampling protocol.

5. Recommendations.

a. Prohibit entrance to un renovated section of building B, all of building A and the gymnasium until buildings are properly cleaned and renovated ensuring that all asbestos and lead has been removed.

b. Continue to keep building C off limits to the Lamar County Activity Staff and children until it can be determined what the Department of Natural Resources are going to do with the building.

c. Clean and dispose of a locker in the back room of the learning center that had lead levels approaching the permissible exposure limit for lead. See sample LC001 in report.

d. Conduct a thorough safety inspection of the facilities and remove all asbestos and lead from un renovated buildings prior to releasing them to the Lamar County Activity Center.

6. If additional information is needed about the contractors report, please contact Non-Responsive Regional Industrial Hygienist, ARNG-IHS, 1-800-362-0262 OR COMMERCIAL (404) 559-417/4.



n-Respo

Regional Industrial Hygienist

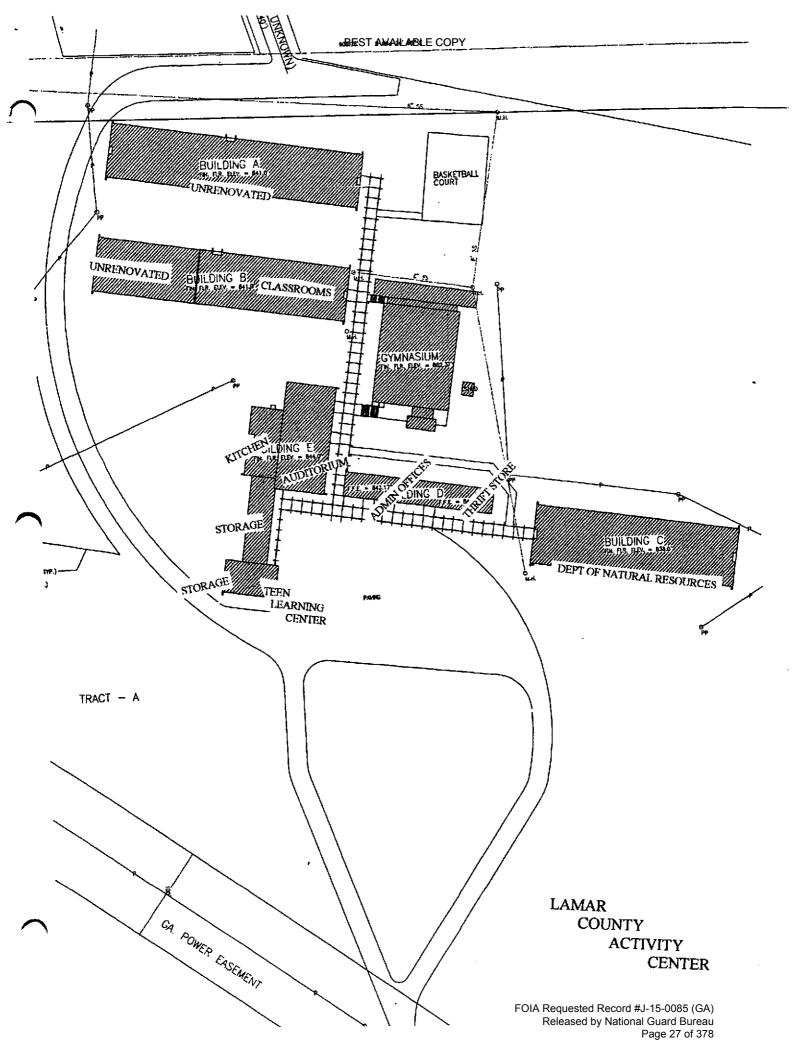
CF: NBG-AVN-SH

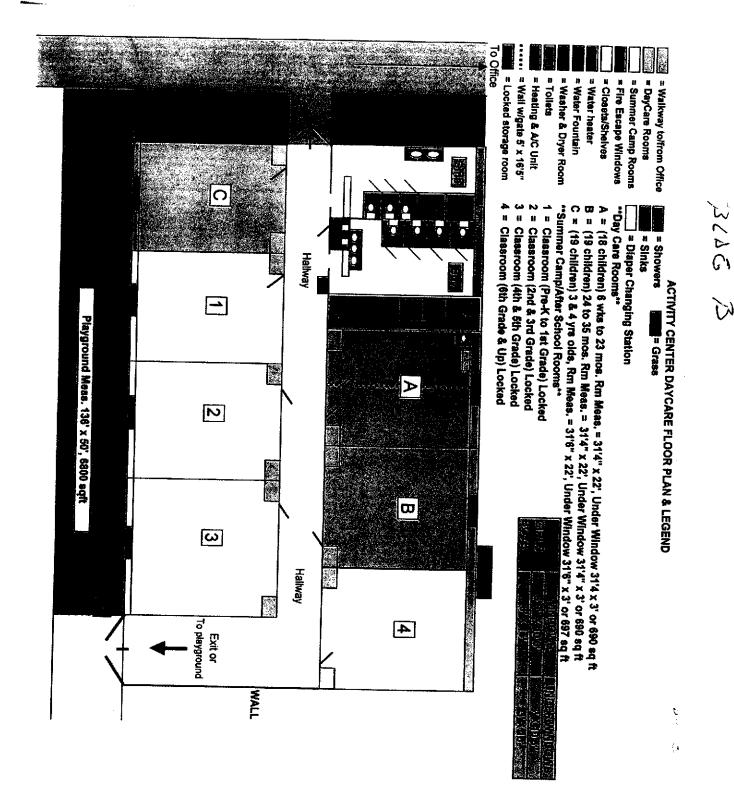
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CF: State Safety Office, GA, ATTN: Mrs. Non-Responsive Occupational Health Manager, 5019 Highway 42, Ellenwood, GA 30294.

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HEADQUARTERS DEPARTMENTS OF THE ARMY AND THE AIR FORCE Washington, DC 20310-2500 31 January 1994

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NG PAM (AR) 385-16/ ANGPAM 91-101

Safety

GUIDELINES FOR CONVERTING INDOOR FIRING RANGES TO OTHER USES

Summary. This is a new pamphlet. This guidance prescribes policy, responsibilities, and procedures on how to convert lead-contaminated indoor firing ranges to other uses.

Applicability. This guidance applies to all persons responsible for the operation of Army National Guard (ARNG) and Air National Guard (ANG) indoor firing ranges. As no regulation/guidance can foresee all situations that might arise, the following is written in a broad scope and is intended to be interpreted as to the INTENT of the law by health professionals.

Supplementation. Supplementation of this guidance is prohibited without prior approval from Chief, National Guard Bureau (NGB-AVN-SI).

Impact on New Manning System. This guidance does not contain information that affects the New Manning System.

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Glossary

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1. Purpose

This pamphlet establishes policy and procedures for converting indoor firing ranges to other uses.

Interim changes. Interim changes are not official unless they are authenticated by the Chief,

Administrative Services. Users will destroy interim

changes on their expiration date unless sooner super-

Suggested improvements. The proponent of this

publication is the National Guard Bureau. Users are invited to send comments and suggested improve-

ments on DA Form 2028 (Recommended Changes to

Publications and Blank Forms) directly to Chief,

National Guard Bureau, Attn: NGB-AVN-SI, 111

South George Mason Drive, Arlington, VA 22204-

Distribution. Distribution of this publication is made in accordance with the requirements on DA Form 12-

2. References

Related publications are listed below.

a. DODI 6055.1 (Department of Defense Occupational Safety and Health (OSH) Program).

b. AR 11-34 (The Army Respiratory Protection Program).

c. AR 40-5 (Preventive Medicine).

d. NGR (AR) 385-15 (Policy, Responsibilities, and Procedures for Inspection/Evaluation and Use of ARNG Indoor Firing Ranges).

e. TB MED 502 (Occupational and Environmental Health Repiratory Protection Program).

f. USAEHA TG 141 (Industrial Hygiene Air Sampling and Bulk Sampling Instructions).

g. Title 29, Code of Federal Regulations (CFR) revision, Part 1910 (Occupational Safety and Health Standards). h. Federal Register, 18 April 1990, Vol 55, No. 75 (Department of Housing and Urban Development, Lead-Based Paint: Interim Guidelines for Hazard Identification and Abatement in Public and Indian Housing, as amended, September 1990, Office of Public and Indian Housing, Department of Housing and Urban Development, 451 Seventh Street, SW, Washington, DC 20410).

I. OSHA Technical Manual, Vol VI

j. DHEW NIOSH 76-130 (Lead Exposure and Design Considerations for Indoor Firing Ranges).

3. Explanation of abbreviations and terms Abbreviations and special terms used in this publication are listed in the glossary.

4. Policy and procedures

a. Conversion of Ranges. If a State wishes to convert an indoor firing range to another functional area, such as a storage area, kitchen, or office space, the following guidance must be adhered to---

b. No Equipment/Items Stored in Range. Wipe samples must be collected and analyzed prior to and after cleaning. Pre- and post-cleaning wipe sample results will be compared to ensure that a minimum 75 percent reduction in surface lead dust is achieved or sample results are 200 ug/sq ft or below which ever is less. The amount and location of wipe samples to be collected are provided in **appendix A**. Interpretation of sample results are contained in **appendices B** and C. Occupational Safety and Health Administration (OSHA) Instruction CPL 2-2.20B (app D) provides the necessary guidance on the technique needed to collect wipe samples.

c. Equipment/items Stored in Range. In addition to the samples that must be collected in the above paragraph, samples must also be collected from equipment/items stored in the range. Sample selection is important. The number of items stored and length of storage differs from range to range. The decision on how many samples to collect will be determined by the individual collecting the samples. The more samples collected, the better the statistical comparison of the results. Samples must be collected from equipment/items with as smooth a surface as possible. Sample results collected from a rough surface would be inaccurate due to the minimal surface contact of the media. Also, the likelihood of tearing the media filter exists. Samples should also be collected on items which have been stored the longest and have not been disturbed. Items stored closest to the bullet trap and firing line are more likely to have higher concentrations of lead dust. Interpretations of sample results are contained in appendices B and C.

5. Goal

The ultimate goal of each State is to ensure every indoor firing range is as free of lead dust as possible before the area is used for other purposes. This can be accomplished if the following guidance is utilized.

6. Background

The Environmental Protection Agency (EPA) identifies lead as a highly toxic metal. Elemental lead is indestructible, and common in the environment. Lead can enter the body by inhalation (breathing) and ingestion (eating). In addition, lead is a cumulative poison. It accumulates in the blood, bones, and organs, including the kidneys, brain and liver. Effects include nervous and reproductive system disorders, delays in neurological and physical development, cognitive and behavioral changes, and hypertension. Symptoms include loss of appetite, difficulty sleeping, irritability, fatigue, headache, and inability to concentrate. It can stay in the bones for decades. Worker awareness and training are important so that employees can recognize the symptoms of exposure and get prompt medical attention.

7. Wipe Sample Media

a. OSHA Instruction CPL 2-2.20B (**app D**) provides the necessary guidance on the technique needed to collect wipe samples. Only distilled or deionized water will be used to saturate sample media. At least one field blank filter must be submitted with each sample sheet. The field blank must be from the same lot and labeled as a blank on the sample sheet. Appendix E identifies how to obtain and where to purchase sample media. Use the following guidance for determining media acceptability.

(1) Acceptable Media consists of---

(a) Thirty-seven (37) millimeter (mm) cellulose ester (CE) filters, with or without the cassette.

(b) Eleven (11) centimeter (cm) diameter Whatman #40 paper.

(c) Whatman smear tabs.

(2) Unacceptable Media consists of but is not limited to--

(a) Cotton balls.

(b) Baby wipes or wet wipes.

b. Documentation of Sample Collection. An AEHA Form 8-R (Bulk Sample Data) must be completed and submitted with samples to your supporting laboratory. A copy of this form is located in appendix F. In-. structions on completing this form are in appendix G. Each sample must be individually marked. If CE filters with cassettes are used; write the sample number on a label and place the label on the outside of the cassette. Whatman paper, smear tabs, or CE filters without the cassette should be placed in a ziplock plastic bag or sterile glass container. Acid must be added to the samples and a glass container would assist the laboratory in analysis. If samples are placed in glass containers, ensure they are properly packed before shipment. A label with the sample number should be placed on the outside of the bag. In addition, a floor plan must be completed of each range which documents the locations of each sample collection point. Current blueprints may be used for this purpose. DO NOT repeat sample numbers; this may cause confusion when sample results are returned, Samples can be sent to USAEHA laboratories for analysis. See appendix I for the laboratory which serves your region.

8. Wipe Sampling Protocol See appendix A.

9. Range Cleaning Instructions

Before a State begins decontaminating their ranges, they must ensure that procedures comply with all federal, state and local regulations. The range ventilation system will be in operation during all cleaning procedures to ensure a negative pressure environment is maintained. In the absence of a mechanical system, all doors and windows will be sealed to eliminate fugitive emissions. A HEPA filtered vacuum system is the preferred method of cleanup followed by wet wiping of the range. The HEPA vacuum is designed to collect loose surface lead dust particles. A cleaning solution containing Tri-Sodium Phosphate (TSP) should be added to all water containers. At least one ounce of five (5) percent TSP should be added to each gallon of HOT water. Mix new solutions of TSP frequently. Wet wiping will require dual containers of water; one container for wetting the applicator (mops, rags, sponge, etc.) and the other container is for rinsing the applicator after the dust has been wiped from surfaces. Waste water placed into containers can be left to evaporate. PROPERLY DISPOSE OF ALL HAZARDOUS WASTE AND DO NOT PLACE ANY LEAD CONTAMINATED WASTE INTO THE SEWER SYSTEM OR ONTO THE GROUND. Mop heads, sponges and rags will be discarded as hazardous waste following cleanup. Wet cleaning by a high pressure system is prohibited, as this method may embed the lead into the substratum and generate large quantities of unwanted hazardous waste. Dry sweeping may not be used. All surface areas of the range must be cleaned. If a surface area of the range is painted or coated with a sealant which is smooth, there is no need to paint over or remove this coated surface material. Wood floors should receive a coat of deck enamel or urethane, concrete floors should be sealed with deck enamel and linoleum or tile floors should be waxed. A progression of cleaning from top to bottom, and from behind the steel backstop to the firing line should be used. After removing the sand, if applicable, and the steel backstop, areas in front of and behind the bullet trap along with the steel backstop plate(s) should be cleaned. Next, clean the ceiling, lights, baffles, retrieval system, heating system(s), and ventilation duct(s). Acoustical material should be vacuumed and removed rather than painted over. A Toxic Characteristic Leaching Procedure (TCLP) test for lead only may need to be performed on the acoustical material. A TCLP test will determine if the material is classified as "hazardous" and can be disposed of in a sanitary landfill. Contact your environmental office for assistance before arranging for this laboratory testing. The floor should be the last surface cleaned, starting at the bullet trap and ending behind the firing line. Following the wet wiping of all surfaces, the area should be permitted to dry and a second HEPA vacuuming of all surface area should take place until no dust or residue can be seen. A thorough visual inspection to detect surface dust should be made following cleanup and prior to resampling. As a variety of conditions exist in ranges, unique situations may arise and specific written guidance from your Regional Industrial Hygiene Office may be required.

10. Cleaning Stored Contaminated Equipment

If stored equipment is confirmed as being contaminated (sample result is higher than the 200 microgram/sq ft) with lead dust, it must be decontaminated before removing from the range. The stored equipment located next to the bullet trap and firing line should be cleaned first and removed. Depending on the size or material of the item, either HEPA vacuum or wet wipe will be used. Refer to paragraph 15 for additional guidance. Every attempt should be made to clean and reclaim the item since disposing of equipment as hazardous waste is costly and wasteful. Only as a last resort will the item be discarded as hazardous waste. Porous items, i.e., canvas tents can be laundered at local companies which specialize in industrial laundry services. Items, such as office partitions and carpet, that were present during firing should be considered grossly contaminated and be discarded unless analysis proves otherwise. Consult your environmental office before removing or disposing of items.

11. Contaminated Sand and Lead Waste

Consult your State's environmental office for specific disposal guidance to comply with local laws on this matter.

12. Medical Surveillance

a. A preplacement medical examination is required of all individuals involved with range cleanup operations. Consult 29 CFR 1910.1025 for additional information on medical surveillance requirements. A medical examination must include - -

- (1) A detailed work and medical history.
- (2) A thorough physical examination.
- (3) A respirator use evaluation.
- (4) A blood pressure measurement.
- (5) Blood sample analysis to include:
 - (a) A baseline blood lead level.
 - (b) A complete blood count (CBC).
 - (c) Blood urea nitrogen (BUN).
 - (d) Serum creatinine.
 - (e) Zinc protoporphyrin.
- (6) A routine urine analysis.
- (7) Recordkeeping.

b. Air Monitoring. Worker-breathing-zone air samples must be collected to ensure personnel are not overexposed to airborne lead during the cleanup phase. Daily air samples will be collected on all personnel involved in the cleanup operation. These exposure levels will be used to evaluate work practices and personal protective equipment. Within five (5) working days after receipt of monitoring results, each employee will be notified in writing of the results which represent that employee's exposure. Refer to USAEHA Technical Guide 141 (app A-6) for air sampling instructions and a blank air sample data form. Contact your Regional Industrial Hygiene Office for assistance.

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13. Worker Education

OSHA 29 CFR 1910.1025 requires that those workers who are potentially exposed to any lead level shall be informed of the content of Appendices A and B of this standard. A training program must be instituted for all individuals who are subject to exposure to lead at or above the action level or for whom the possibility of skin or eye irritations exists. The training program shall be repeated for personnel currently involved in range cleanup operations, at least annually. This training must be documented on DD Form 1556 or DD Form 1556-1 and filed permanently in the employee's Official Personnel File (OPF) or the soldier's Official Military Personnel File (OMPF). As a minimum, complete blocks 1, 2, 3, 7, 8, 11, 12, 13, 17, 18, 24, 33, and 36 on DD Form 1556. Place the following statement in block 18, "Do not destroy, retain this record for the duration of employment/service plus 30 years." The employer will assure that each employee is informed of the following:

a. The content of the standard and its appendices.

b. The specific nature of operations that could result in exposure to lead above the action level.

c. The purpose, proper selection, fitting, use and limitations of respirators.

d. The purpose and a description of medical surveillance program.

e. Eating and drinking are prohibited in lead contaminated areas.

f. Smoking and smoking materials will not be permitted in contaminated areas.

g. Employees must wash their hands and other exposed skin whenever they leave the work area.

h. The engineering controls and work practices associated with the individual's job assignment.

L The contents of any compliance plan in effect.

14. Personal Protective Equipment

As a minimum, personnel conducting the decontamination of the range will be provided with the following personal protective equipment:

a. Full face air purifying respirator with HEPA cartridges. The requirements outlined in 29 CFR 1910.134 must be met prior to placing workers in respiratory protection.

b. Protective coveralls with hood and shoe covers or disposable Tyvek TM full body suit. Protective clothing will be changed at least daily at the end of shift and more frequently if it should become grossly contaminated. If cotton coveralls are used by the employees, then the employer will provide for maintaining and laundering of protective clothing. Protective clothing will not be taken home by personnel. Prior to leaving the work area, employees will thoroughly HEPA vacuum clothing to prevent lead dust from leaving the area. If disposable clothing is used, it will be HEPA vacuumed before removal and placed in a proper disposal container. Work and street clothing will not be stored together.

c. Disposable rubber gloves will be provided.

15. Point of Contact

Deviations from this guidance will require a written exception to policy from your Regional Industrial Hygiene Office. Questions and/or comments regarding this subject should be directed to your Regional Industrial Hygiene Office or Chief, National Guard Bureau, Attn: NGB-AVN-SI, 111 South George Mason Drive, Arlington, VA 22204-1382.

Appendix A SAMPLING STRATEGY FOR COLLECTION OF WIPE SAMPLES

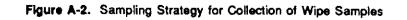
A-1. A template measuring 10 centimeters by 10 centimeters square, approximately 4 inches square, (see App D, app 2-A) should be used to accurately measure and mark the area before collecting wipe samples.

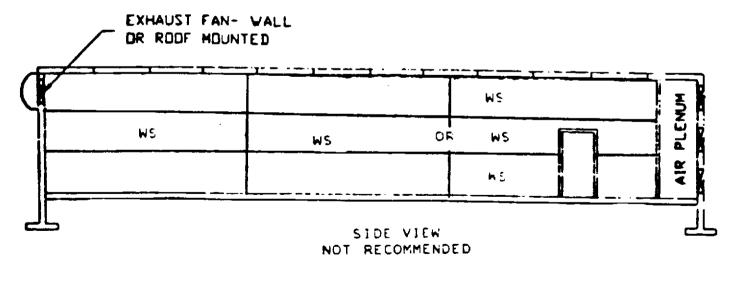
A-2. Prior to cleaning the range, three samples must be collected and analyzed for total lead dust on each surface, i.e., floor, ceiling, backstop, and each wall to include the plenum wall, if applicable. In addition, a total of 3 samples should be collected from the fixtures, i.e., gas/electric heaters, lights, baffles. As a minimum, 18 samples will be collected. Samples should be collected from areas which have been least disturbed by airflow. Established walkways should be avoided.

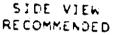
A-3. Samples should be staggered to different areas of the range. A grid system should be utilized. Each range surface area should be divided evenly into 3 sections by 3 sections. A wipe sample should be collected as illustrated in figures A-1 and A-2. Samples should not be collected on all one section of a wall or end of the building.

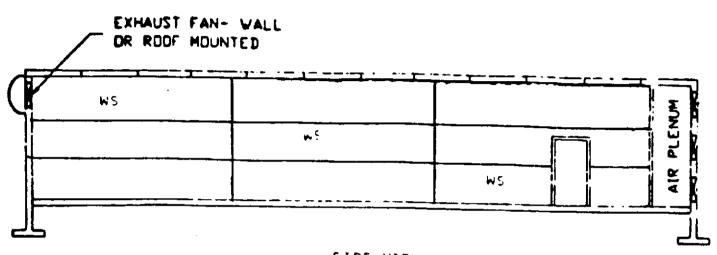
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SAMPLING STRATEGY FOR COLLECTION OF WIPE SAMPLES

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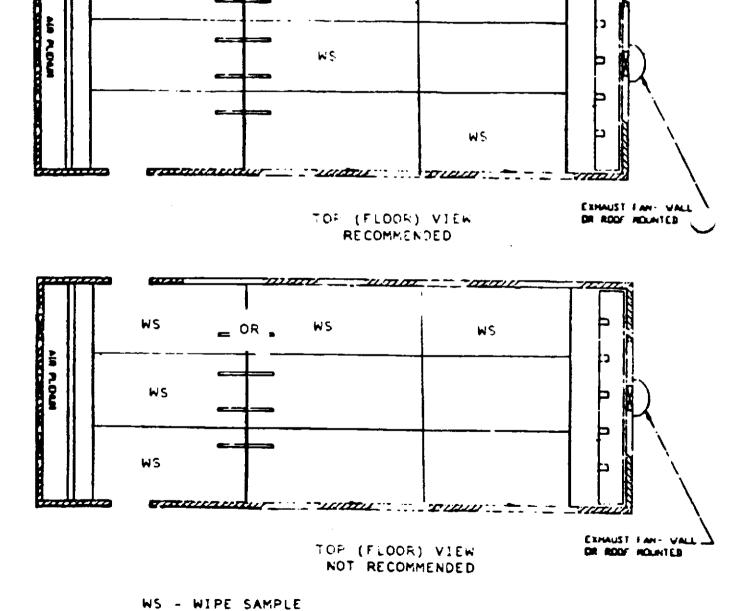


Figure A-1. Sampling Strategy for Collection of Wipe Samples

SAMPLING STRATEGY FOR COLLECTION OF WIPE SAMPLES

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APPENDIX B

INTERPRETATION OF SAMPLE RESULTS (PRIOR TO CLEANING)

B-1 200 micrograms/sq ft or LESS

If all sample results are 200 micrograms/sq ft or less, the range can be converted and/or used for any purpose.

B-2 BETWEEN 201 and 200,000 micrograms/ sq ft.

Range must be decontaminated. Continue with cleaning instructions listed in paragraph 15. Sample results will be used to establish a baseline. The baseline sample results will be used to ensure the 75 percent reduction is achieved.

B-3 OVER 200,000 micrograms/sq ft.

Your sample media may not be capable of collecting additional lead dust and results that are above 200,000 micrograms/sq ft should be considered suspect. Larger concentrations of lead dust may exist on surfaces tested other than results indicate. If the initial sampling results are above 200,000 micrograms/sq ft, the range should be cleaned by either HEPA vacuuming and/or wet wiping to establish a baseline. After the cleaning procedure is completed, resampling should occur until sample results are under the 200,000 micrograms/sq ft limit.

B-4 High sample results may exist due to personnel walking or moving equipment/vehicles over the range surfaces causing the lead dust to be "ground" into the substratum. For example, a maintenance activity may have oversprayed paint or spilled solvents onto the surface which would bond with the lead dust. Consult your Regional Industrial Hygiene Office for specific guidance.

APPENDIX C INTERPRETATION OF SAMPLE RESULTS (AFTER CLEANING)

C-1 200 micrograms/sq ft or LESS

If all sample results are less than 200 micrograms/sq ft, the range can be converted and/or used for any purpose after a coat of lead-free latex paint is applied. The paint color must contrast the color of the present substratum.

C-2 ABOVE 200 micrograms/sq ft

As a minimum, a 75 percent reduction should occur from your initial sample results or the samples should be under the 200 microgram/sq ft level. If all sample results meet this criteria, a contrasting color of leadfree latex paint must be applied before the area is utilized for other purposes. The room can only be used as a storage area. Storage of kitchen equipment and food is prohibited. The room cannot be used for a child care or nursery area. If sample results are not below the 75 percent reduction, a more thorough cleaning of the range is required along with resampling until criteria are met.

 PLEASE NOTE, that if your original wipe sample results were, i.e., 175,000 ug/sq ft then you would have to reduce the lead level below 13,125 ug/sq ft. This would meet the 75 percent reduction criteria; however, this is an enormous amount of lead dust and care should be taken to ensure a heavy coat of paint seals the lead dust. It is unknown at this time whether or not the remaining amount of lead dust will allow the latex. paint to adhered to the substratum. If the paint peels, fails to the floor and is crushed over a period of time, it will create another respirable lead hazard. If this happens, contact your Regional Industrial Hygiene Office for guidance. Periodically monitor the converted range for signs of peeling paint. Paint chips can be analyzed for lead content. DO NOT IGNORE PEELING PAINT IN A CONVERTED INDOOR FIRING RANGE.

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Appendix D

OSHA Instruction CPL 2-2 208 FEB 5 1530 Directorate of Technical Support

CHAPTER 2

SAMPLING FOR SURFACE CONTAMINATION

A. GENERAL

- The terms "wipe sampling," "swipe sampling" and "smear sampling" are all used synonymously to describe the techniques used for assessing surface contamination. "lowever, the term "wipe sampling" is one which will be used in this chapter.
- "Wipe sampling" is most often used to screen for asbestos, lead, other metals, and PCBs.
- 3. The uses are:
 - a. Skin Sampling
 - Potential contact with skin instants may be evaluated by wiping surfaces, which may be touched by workers.
 - 2) Skin wipes are not recommended for those substances which absorb rapidly through the skin. Biological monitoring for these substances or their metabolites, or biological markers, is often the only means of assessing their absorption. Wipe the inside surfaces of protective gear or other surfaces which may contact skin, insteed.
 - b. Surfaces
 - Surfaces which may be contacted by lood or other materials which are ingested or placed in the mouth (e.g., chewing tobacco, gum, cigarettes) may be wipe sampled (Including hands and fingers) to show contamination.
 - Contaminated smoking materials may allow the toxic materials, or their

combustion products, to enter the body via the lungs (e.g., lead, mercury). Wiping of surfaces which smoking materials may touch (e.g., hands and fingers) may be useful in evaluating this possible route of exposure.

- Accumulated toxic materials may become suspended in air, and may contribute to airborne exposures (e.g., asbestos, lead or beryflium). Bulk and wipe samples may aid in determining this possibility.
- c. Personal Protective Equipment Sampling
 - Effectiveness of personal protective gear (e.g., gloves, aprons, respirators, etc.) may sometimes be evaluated by wipe sampling the inner surfaces of the protective gear (and protected skin).
- Effectiveness of decontamination of surfaces and protective gear (e.g., respirators) may sometimes be evaluated by wipe sampling.
- When accompanied by close observation of the operation in question, wipe sampling can help identify sources of contamination and poor work practices.
- 5. Evaluation of Sampling Results
 - a) False negative results, i.e., surface contamination is not detected by a wipe sample, are possible.
 - b) The CSHO must use professional judgment on a case-by-case basis when evaluating the significance of positive wipe sampling results.

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OSHA Instruction CP1, 2-2.208 FEB 5 1394 Directorate of Technical Support

- c) Consider the toxicity, contribution of skin absorption and/or gastrointestinal absorption to the total dose. Other factors are the ambient air concentrations, skin irritation, etc., when evaluating sample results.
- The Chemical Information Manual, lists substances which represent a potential for ingestion toxicity, skin absorption, and/or have a hazardous skin effect. This information may be found under the "Health" notation. Additional toxicological information concerning chronic skin absorption, dermatikis, etc. should be used in determining if the resulting exposure presents a potential employee hazard (see bibliography).

B. GENERAL TECHNIQUE FOR WIPE SAMPLING

1. Filter Media and Solventa

- a. Consult the Chemical Information Manual, for appropriate filter media and solvents (dry wipes may be used; solvents are not always necessary but may enhance removal).
- b. Direct skin wipes should not be taken when high skin absorption of a substance is expected. Under no conditions should any solvent other than distilled water be used on skin, personal protective gear which directly contacts the skin, or surfaces which contact food or tobacco products.
- c. Generally, there are two types of fitters recommended for taking wipe samples:
 - Glass fiber filters (GFF) (37 mm) are usually used for materials which are analyzed by High Performance Liquid Chromatography (HPLC), and often for

substances analyzed by Gas Chromatogaphy (GC). The Chemical Information Manual specifies when GFFs are to be used.

- Paper filters are generally used for metals, and may be used for anything not analyzed by HPLC. For convenient usage, the Whatman smear tab (or its equivalent) is commonly used. (see Chemical Information Manual for details).
- d. Preloading a group of vials with appropriate filters is a convenient method. (The Whatman smear tabs should be inserted with the tab end out.) Aways wear clean plastic gloves when handling filters. Gloves should be disposable and should not be powdered.

2. Procedures

Follow these procedures when whe samples are taken:

- a. If multiple samples are to be taken at the worksite, prepare a rough sketch of the area(s) or room(s) which are to be wipe sampled.
- b. A new set of clean impervious gloves should be used with each individual sample. This avoids contamination of the filter by the hand and the subsequent possibility for false positives, and prevents contact with the substance.
- c. Withdraw the filter from the vial. If a damp wipe sample is desired, moisten the filter with distilled water (or other solvent as recommended in the Chemical Information Manual).

CAUTION:

Skin, personal protective equipment or surfaces which contact food or tobscco products must either be wiped DRY, or wiped with distilled water, never with organic solvents. Skin wipes should not be done for materials with high skin absorption.

Appendix D

It is recommended that hands and fingers be the only skin surfaces wiped. Before any skin wipe is taken, explain why you want the sample and ask the employee about possible skin allergies to the chemicals in the sampling filter or media. If the employee refuses, do not force the issue.

- Wipe a section of the surface to be sampled using a template with an opening exactly 100 cm². (See Appendix 2-A)
- e For surfaces smaller than 100 cm² use a template of the largest size possible. Be sure to document the size of the area wiped. For curved surfaces, the wiped area should be estimated as accurately as possible and then documented.
- f Maximum pressure should be applied when wiping.
- g. To insure that all portions of the partitioned area are wiped, start at the outside edge and progress toward the center making concentric squares of decreasing size.
- h If the filter dries out during the wiping procedure, discard the filter, reduce area to be wiped by hall, and repeat wiping procedure with a new filter.
- i. Without allowing the filter to contact any other surface, fold the filter with the exposed side in, then fold it over again. Placethe filter in a sample visil, cap the visil, number it, and place a corresponding number at the sample location on the sketch. Include notes with the sketch giving any further description of the sample (e.g., "Fred Employee's respirator, .nside;""Lunch table;" etc.).
- At least one blank filter tranted in the same lashion, but without wiping, should be submitted for each sampled area.
- k. Submit the samples to the Salt Lake City Analytical Laboratory with the appropriate OSHA 91.

OSHA Instruction CPL 2-2.208 FEB, 5 Istru Directorate of Technical Support

C. SPECIAL TECHNIQUES FOR WIPE SAMPLING

1. Acids and Bases

When examining surfaces for contamination with strong acids or bases, (e.g., hydrochlonc acid and sodium hydroxide), pH paper moistened with water may be used. However, these results should be viewed with caution due to potential interferences.

2. Direct Reading Instruments

For some types of surface contamination (e.g., mercury sniffer for mercury), direct reading instruments may be used.

3. Aromatic Amines

Screening may be done to determine the precise areas of carcinogenic aromatic amine contamination. This is an optional procedure. (See Appendix 2-8)

D. SPECIAL CONSIDERATIONS

- Due to their volatile nature, most organic solvents are not suitable for wipes. If necessary, surface contamination can be judged by other means, (e.g., by use of detector tubes, photoionization analyzers, or other similar instruments). Consult the Chemical information Manual.
- Some substances are not stable enough as samples to be wipe sampled reliably. Consult the Chemical Information Manual.
- Some substances should have solvent added to the vial as soon as the wipe sample is placed in the vial (e.g., Benzidine). These substances will be indicated with an "X" next.

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Directorate of Technical Support

to the solvent notation in the Chemical Information Manual.

- 4. Do not take surface wipe samples on skin it: a) OSHA or ACGIH shows a "skin" notation, the substance has a skin LD50 of 200 mg/kg or less, or an acute one LD50 of 500 mg/kg or less.
 - b) The substance is an irritant, causes dermatitis, contact sensitization, or is termed corrosive.

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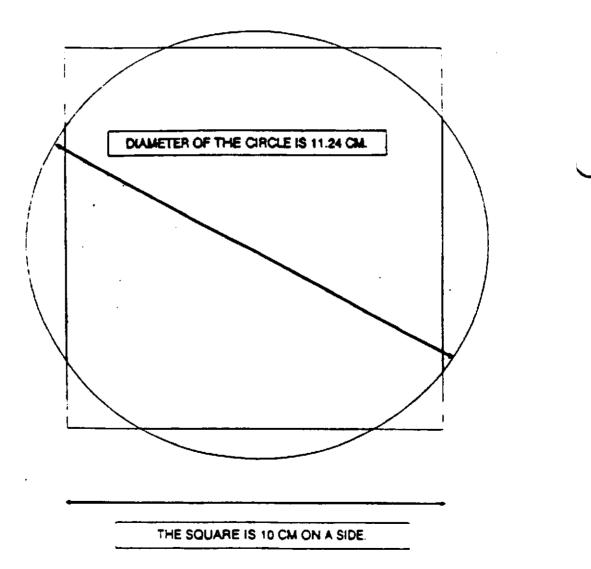
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Appendix D

OSHA Instruction CPL 2-2.208 FEB 5 (990 Directorate of Technical Support

APPENDIX 2-A

Template samples which cover 100 square centimeters.



Appendix D

OSHA Instruction CPL 2-2.208 FEB 5 Mar Directorate of Technical Support

APPENDIX 2-8

Screening for Carcinogenic Aromatic Amines

- 1 As in the case of routine wipe sampling, wear clean, disposable impervious gloves. Wipe an area of exactly 100 cm² with a sheet of filter paper moistened in the center with 5 drops of methanol.
- After wiping the sample area, apply 3 drops of fluorescamine (a visualization reagent supplied by SLCAL upon request) to the contaminated area of the filter paper.
- 3 Place a drop of the visualization reagent on an area of the filter paper which has not contacted the surface. This marks a non-sample area or blank on the filter paper adjacent to the test area.
- 4 After a reaction time of 6 minutes, irradiate the filter paper with 366 nm ultraviolet light.
- Compare the color development of the contacted area with the non-sample area or blank. A
 positive reaction will show a discoloration as a yellow color darker than the yellow color of the
 fluoroescamine blank.
- A discoloration indicates surface contamination, possible aromatic amine carcinogen. Repeat a wipe sampling of the contaminated areas using the regular surface contamination procedure.
- The following compounds are some of the suspected carcinogenic agents that can be detected by this screening procedure:

4,4'-Methylene bis(2-chloroaniline) Benzidine α-Napthylamine β-Napthylamine 4-Aminobiphenyl

APPENDIX E Where to Purchase Sample Media and Containers

E-1. The following is a list of vendors which supply the media and containers necessary to collect air and lead surface wipe samples. The information is provided to assist States in obtaining the proper media and containers. Alternative vendors are available and may be utilized, if known. Contact your Regional Industrial Hygiene Office for additional assistance or clarification.

E-2. Pre-loaded 3 piece cassette with cellulose ester (CE) filter and pad, 37 millimeter (mm), pore size 0.8 microns, breathing zone (BZ) and general area (GA) air samples.

Order From	<u>Catalog Number</u>
a. Millipore Corp. Ashby Road Bedford, MA 01730 617-275-9200 800-225-1380	MAWP-037-A0
b. Gelman Sciences 600 South Wagner Rd Ann Arbor, Mi 48106 313-665-0651 800-521-1520	64678 (GN-4)
c. Supeico, Inc. Supeico Park Beilefonte, PA 16823 800-247-6628 800-359-3041	2-3368M

E-3. 37 mm CE filter with pad, no cassette included, for lead surface wipe samples.

Order From	Catalog Number
 Supelco, Inc. Supelco Park Bellefonte, PA 16823 800-247-6628 800-359-3041 	2-3381M
b. Millipore Corp. Ashby Road Bedford, MA 01730 617-275-9200 800-225-1380	AAWP-037-00
c. SKC,Inc. 334 Valley View Rd Eighty Four, PA 15330 412-941-9701 800-752-8472	225-5

E-4. Smear tabs are used for lead surface wipe samples.

Order From

Catalog Number

225-24

SKC, Inc.
 334 Valley View Rd
 Eighty Four, PA 15330
 412-941-9701
 800-752-8472

E-5. Number 40 Whatman paper, 11.0 centimeters in diameter, used for surface wipe samples.

Order From	Catalog Number
 Cole-Parmer 7425 North Oak Park Ave Chicago, iL 60648 708-647-7600 800-323-4340 	L-06647-13
 b. Thomas Scientific 99 High Hill Rd at I-95 P.O. Box 99 Swedesboro, NJ 08085- 609-467-2000 800-524-0027 	4716-E25 0099
 c. Fisher Scientific 711 Forbes Avenue Pittsburgh, PA 15219 412-562-8300 	09-845-D
E-6. Glass container (25 millili shipment of media.	iter) for collection and
Order From	<u>Catalog Number</u>
 Pierce Chemical Compan P.O. Box 117 Rockford, IL 61105 815-968-0747 800-874-3723 	у 13219 (screw сар)
 Altech Associates, Inc. Applied Science Labs 2051 Waukegan Rd Deerfield, IL 60015 312-948-8600 800-255-8324 	95321 (screw cap)
E-7. Plastic ziplock bags can b Army logistics system. Man Contact your supporting logis tance.	y sizes are available.
E-8. Distilled water can be pucery stores, usually by the galk mately \$1.25. Deionized wate cal and state water labs or a ho	on, at a cost of approxi- r can be obtained at lo-
E-9. Tri-Sodium Phosphate (7 at almost any hardware store.	SP) can be purchased

••••

Appendix F

· ·		ند: مرب _ا برواید:	BULK SAMP	LE DAT						
For use of this form see USASEA TG 141; the proponent is ESHB-LO.										
Return Address (complete address including lip Code) Point of Contect (name/AUTOYON)										
			-							
Sampled	Sampled Installation Project Number ARLOC									
Samples	Collected By	Date Shipp	bed							
Descripti	on of Operati	~~			_					
Description	ion of observed	ψn				Location (BLDG/AREA)			
Associate	d Complaints	(be spe	cific)			L				
			•							
	d Air Sample	\$	It yes, I	ist sam	ple num	Ders				
Yes	No					<u></u>				
Trade Na:	<u></u>		Label Infor	mation						
			n Sh		Manufa	Turer				
Address			<u></u>		MSDS A	tached				
]Yes [No			
Analysis	Desired									
Lab Use	Sample	Co	mstituents		Results		Remarks			
Only	No.									
···· ··· ···										
			······			·				
			· · · · · · · · · · · · · · · · · · ·				<u> </u>			
Comments	to Lab:									
	Lab Use Only									
	initials).		wed By (initial	1	Date	Received	Date Reported			
Procedure	s Performed		Comments:							
AFHA Form										

AEHA Form 8, 1 Oct 84

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Appendix G

USAEHA TG No. 141

December 1990

Instructions for Completing AEHA Form 8-R, Bulk Sample Data

- 1. Return address: Self-explanatory.
- 2. Point of contact. Name and DSN of person in charge of sampling/project.
- 3. Sampled installation: Self-explanatory.
- 4. Project number: For USAEHA and OSA use only.
- 5. ARLOC: Army location code reference DA Pam 525-12 (CONUS) and 525-13 (Foreign).
- 6. Samples collected by: Self-explanatory.
- 7. Date collected: Self-explanatory.
- 8. Date shipped: Date samples sent for analysis.

9. Description of operation: Brief description of the industrial operation (for example, degreasing metal parts, spray painting vehicles, etc.).

10. Location (bidg/area): Self-explanatory.

11. <u>Associated complaints</u>: Worker complaints about exposure problems arising from operation (for example, dizziness, nausea, skin irritation, etc.).

12. <u>Associated air samples</u>: If air samples corresponding to these bulks are submitted for analysis, please so indicate and list the sample numbers which identify these air samples. Ship air samples separately from bulk samples.

13. Label Information:

a. Irade name: Self-explanatory; if unknown, indicate.

b. NSN: If available, so indicate.

- c. Manufacturer: Self-explanatory; if unknown, so indicate.
- d. Address: Self-explanatory; if unknown, so indicate.
- e. MSDS: Attach the MSDS whenever possible and so indicate.

14. Analysis desired: List specific parameters when they are known or suspected to be present otherwise, indicate general type of analysis desired (for example, unknown solvents, etc.).

15. Lab use only: Leave blank.

USAEHA TG No. 141

December 1990

16. <u>Sample number:</u> Number that field personnel assigns to the sample number. Use a consecutive numbering system so there is no duplication of numbers from batch-to-batch samples.

17. Constituents: Leave blank.

- 18. Results: Leave blank.
- 19. Remarks: Leave blank.

20. Comments to lab: Use for any general information or remarks you wish to include.

21. Lab use only: Leave blank.

. *

APPENDIX H

Examples of Computation of Lead Levels From Wipe Sample Results

Sample results will be returned in the form of micrograms. The results must be converted to micrograms per square foot. This can be accomplished by following the examples listed below:

75ua	<u>929 cm2</u>	ua
100 cm2	1 sq ft	sq ft
<u>75 x 929</u> 100	= <u>69675</u> = 69 100	6.75ug/sq ft
	OR	
<u>75ug</u> 16in2	<u>144 in2</u>	
TOINZ	1 sq ft	sq ti
75	x 9 = 675ug/sq	ft

ug - microgram cm2 - centimeters squared sq ft - square foot in2 - inches squared

Appendix 1

USAEHA TG NO. 141

December 1990

Supporting Laboratories and Areas Served

Supporting laboratory

Commander U.S. Army Environmental Hygiene Activity-South Fort McPherson, GA 30330-5000 DSN 572-3234

Commander U.S. Army Environmental Hygiene Activity-West Fitzsimons Army Medical Center Aurora, CO 80045-5001 DSN 943-8288

Commander U.S. Army Pacific Environmental Health Engineerng Agency Sagami APO San Francisco 96343 Camp Zama 228-4111

Commander 10th Medical Laboratory ATTN: AEMML-PM-LAB APO New York 09180 Landstuhl Military (2223-)7272

Commander U.S. Army Environmental Hygiene Agency ATTN: HSHB-ML-A Bidg E2100 Aberdeen Proving Ground, MD 21010-5422 DSN: 594-2619 (metals, quartz, asbestos) DSN: 584-2208 (solvents, organics, acid mists, pesticides)

Areas served

Alabama, Arkansas, Florida, Georgia, Western Kentucky, Louisiana, Mississippi, Oklahoma, Panama, Puerto Rico, South Carolina, Tennessee, Central & Eastern Texas

Alaska, Arizona, California, Colorado, Idaho, Illinois, Iowa, Kansas, Michigan, Minnesota, Missouri, Montana, Nebraska, Nevada, New Mexico, North Dakota, Oregon, South Dakota, West Texas, Utah, Washington, Wisconsin, Wyoming

Hawaii, Japan, Korea, Okinawa, Philippines, Thailand, and all other Far East countries

Europe, Africa, Middle East, Western Europe, Turkey, Africa, and Middle East countries

a. Worldwide support to laboratories listed above
b. Connecticut, Delaware, District of Columbia, Eastern Kentucky, Indiana, Maine, Maryland, Massachusetts, New Hampshire, New Jersey, New York, North Carolina, Ohio, Pennsylvania, Rhode Island, Vermont, Virginia, West Virginia BEST AVAILABLE COPY

Glossary

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Section 1 Abbreviations

ANG Air National Guard

ARNG Army National Guard

BUN Blood urea nitrogen

BZ breaking zone

CBC Complete blood count

CE cellulose ester

CFR Code of Federal Regulations

cm centimeter

DHEW Department of Health, Education, and Welfare

EPA Environmental Protection Agency

GA general area

OMPF Official Military Personnel File

By Order of the Secretaries of the Army and the Air Force:

mm millimeter

OPF Official Personnel File

OSHA Occupational Safety and Health Administration

TCLP Toxic Characteristic Leaching Procedure

TSP Tri-Sodium Phosphate

ug/aq ft microgram per square foot

USAEHA US Army Environmental Hygiene Agency

Section II Terms

HEPA Refers to high efficiency particulate air filter system capable of capturing up to 99.97 percent of particles 0.3 microns in size or larger.

Lead-Contaminated Range It is assumed that all indoor ranges which have been fired in are lead-contaminated.

Wipe Sample The terms wipe, swipe, or smear sample are used synonymously to describe the techniques utilized for assessing lead surface contamination.

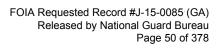
PHILIP G. KILLEY Major General, USAF Acting Chief, National Guard Bureau

Official:

DAVID MISKELL Acting Chief Administrative Services

Distribution: A/F

FOIA Requested Record #J-15-0085 (GA) Released by National Guard Bureau Page 49 of 378 BEST AVAILABLE COPY



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NATIONAL GUARD REGION SOUTH INDUSTRIAL HYGIENE OFFICE 510 PLAZA DRIVE, SUITE 1530 COLLEGE PARK, GA 30349

NGB-ARCAL-SEIH

August 19, 2008

MEMORANDUM THRU LT. Deputy State Surgeon, Georgia Army National Guard, Medical Command, 5019 Highway 42, Ellenwood, GA 30294.

TO: Mr. Non-Responsive, Georgia Army National Guard, CFMO-Environmental Officer, Post Office Box 437, Hinesville, GA 31315-5066.

SUBJECT: Calhoun National Guard Armory, Lead Sampling Survey, Calhoun, Georgia.

1. References.

- Department of Defense Instruction 6055.1, Department of Defense Occupational Safety and Health (OSH) Program, 26 October 1984.
- b. Army Regulation (AR) 40-5, Medical Service, Preventive Medicine, 22 July 2005.
- c. National Guard Regulation (NGR) 385-10, Army National Guard Safety and Occupational Health Program, 1988.
- d. AR 385-10, The Army Safety Program, 29 February 2000.
- e. NGR Pam 420-15, Guidelines and Procedures for Rehabilitation and Conversion of Indoor Firing Ranges, 3 November 2006.
- f. NGR 385-15, Policy and Responsibilities, Evaluation and Operation of Army National Guard Indoor Firing Ranges, 3 November 2006.
- g. DA PAM 40-503, The Army Industrial Hygiene Program, 30 October 2000.
- h. Threshold Limit Values and Biological Exposure Indices (TLV's) for 2003, American Conference of Governmental Industrial Hygienists (ACGIH), Cincinnati, Ohio.
- i. Industrial Ventilation, 23rd Edition, American Conference of Governmental Industrial Hygienist, Cincinnati, Ohio.
- j. Title 29, Code of Federal Regulations (CFR), 2001 rev., part 1910, Occupational Safety and Health Standards.

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FOIA Requested Record #J-15-0085 (GA) Released by National Guard Bureau Page 51 of 378 SUBJECT: Lead Sampling Survey, Calhoun Armory, Calhoun, Georgia.

2. General.

NGB-ARCAL-SEIH

- a. As requested by, Georgia Occupational Health Office, personnel with the National Guard Region South Office performed a visual inspection at the referenced site. The apparent objective of the inspection was to collect surface wipe samples from the former Indoor Firing Range (IFR) for analysis of total lead to confirm/deny the presence of lead dust at concentrations above regulatory standards.
- b. Sergeant (SGT) Non-Responsive with the National Guard Region South Industrial Hygiene Office in College Park Georgia performed the site visit.

3. Findings.

General Information

On July 25, 2008, a site visit was conducted and at the time of the sampling activity, the interior of the former IFR appeared to have undergone conversion to a training/classroom. The flooring was observed to be covered with vinyl floor tile and there was a drop ceiling present completed with acoustical ceiling panels. Painted cinderblock walls were observed and there were offices constructed in the area identified as the former location of the bullet stop. There was however exposed concrete flooring and original ceiling materials observed inside the electrical room of the converted IFR. As a result of the renovated room, sampling locations were limited to exposed wall surfaces, concrete flooring and ceiling materials in the electrical room as well as the vinyl floor covering.

Sampling Activities

Based on the number of surfaces observed, samples were collected in accordance with NG Pam 420-15. Ghost Wipes[™] are pre-moistened media made of non-woven polyvinyl alcohol fiber and approved by American Industrial Hygiene Association (AIHA) for lead sampling. The wipes also meet all American Standards Testing Materials (ASTM) Designation E1792-96E specifications for sampling materials for lead in surface dust.

The surface samples were collected by SGT using a 1 square foot sampling template placed on the surface area identified for sampling. The area within the template was wiped using a new Ghost WipeTM. After the area inside the template was wiped, the sampling media was placed into a labeled re-sealable plastic bag and sealed. After each sample collection, a new surface area template was used and new disposable gloves were donned. A total of 14 samples were collected including three from each exposed surface area, with the exception of only one sample collected from the exposed ceiling area at the rear of the former IFR and there were no samples collected from the wall adjacent to the former bullet stop due to the offices constructed at that location. Collected samples were submitted to Analytical Environmental Services, Inc. (AES) in Atlanta, Georgia for subsequent analysis of total lead. In addition, one wipe sample was placed into a resealable bag and submitted as field blank samples for analysis.

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FOIA Requested Record #J-15-0085 (GA) Released by National Guard Bureau Page 52 of 378

August 19, 2008

SUBJECT: Lead Sampling Survey, Calhoun Armory, Calhoun, Georgia.

Laboratory Results

NGB-ARCAL-SEIH

The laboratory results did not indicate the presence of lead concentrations above the IFR post cleaning standard of 200micrograms per feet squared ($\mu g/ft^2$). These sampling results indicate that any previous decontamination activities appear to be adequate to remove the lead dust from the former range at acceptable levels. It should be noted that the sampling activities were completed in a former IFR which has undergone conversion/renovation.

The results of the lead dust sampling activities are summarized in the following table.

Sample Number	Sample Location	Laboratory Results ¹
CAL-01	Upper Right Wall	BRL ²
CAL-02	Middle Right Wall	BRL
CAL-03	Lower Right Wall	BRL
CAL-04	Upper Rear Wall	BRL
CAL-05	Middle Rear Wall	BRL
CAL-06	Lower Rear Wall	BRL
CAL-07	Upper Left Wall	BRL
CAL-08	Middle Left Wall	BRL
CAL-09	Lower Left Wall	BRL
CAL-10	Floor at Former Bullet Stop	BRL
CAL-11	Floor, Middle of Former IFR	BRL
CAL-12	Floor, Rear of Former IFR	BRL
CAL-13	Field Blank	BRL
CAL-14	Ceiling at Rear of Former IFR	BRL

Results reported in micrograms per square feet (µg/ft²)

² BRL = Below Reportable Limits

The laboratory report, including the Chain of Custody record is attached for review.

4. Recommendations.

- a. In as much as the former IFR at the Calhoun Armory has been converted to a training room, it appears that lead dust is not present at concentrations above the NGB standard. It should be noted that the sampling activities were limited to exposed areas and in the case of the floor sampling, the vinyl floor tile was wiped for lead dust.
- b. In accordance with NGB Pamphlet 420-15, continue lead testing on an annual basis to verify that lead has not migrated from the substrate.

SUBJECT: Lead Sampling Survey, Calhoun Armory, Calhoun, Georgia.

5. If additional information is needed about the contractors report, please contact SGT Non-Responsive Regional Industrial Hygiene Technician, 1-800-362-0262 OR COMMERCIAL (404) 559-4174.

Non-Responsive

NGB-ARCAL-SEIH

Regional Industrial Hygienist

CF: Georgia Army National Guard, ATTN: LT Non-Responsive Deputy State Surgeon Office, 5019 Highway 42, Ellenwood, GA 30294.

CF: State Safety Office, GA, ATTN: MAJ. Non-Responsive Safety and Occupational Health Manager, 1388 1st Street, Building 840, Dobbins ARB, GA 30069.

CF: Georgia Department of Defense, ATTN: Mr Non-Responsive CFMO-ENV Building 21, 935 E. Confederate Avenue, SE, Atlanta, GA 30316.

CF: Georgia Department of Defense, ATTN: Mr. Non-Responsive Facilities Maintenance Manager, Building 12, 935 E. Confederate Avenue, SE, Atlanta, GA 30316.

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ANALYTICAL ENVIRONMENTAL SERVICES, INC.

August 01, 2008

Non-Responsive

National Guard Bureau Region-South IH 510 Plaza Drive, Suite 1530 Suite 1530 College Park, GA 30349

TEL: (404) 559-4174 FAX: (404) 559-4175

RE: Calhoun Armory

Dear Non-Responsive

Order No.: 0807118

Analytical Environmental Services, Inc. received 14 samples on 7/25/2008 12:45:00 PM for the analyses presented in the following report.

No problems were encountered during the analyses. Additionally, all results for the associated Quality Control samples were within EPA and/or AES established limits. Any discrepancies associated with the analyses contained herein will be noted and submitted in the form of a project Case Narrative.

AES' certifications are as follows:

-NELAC/Florida Certification number E87582 for analysis of Environmental Water, soil/hazardous waste, and Drinking Water Microbiology, effective 07/01/08-06/30/09. -AIHA Certification ID #100671 for Industrial Hygiene samples (Organics, Inorganics), Environmental Lead (Paint, Soil, Dust Wipes, Air), and Environmental Microbiology (Fungal) effective until 08/01/09.

These results relate only to the items tested. This report may only be reproduced in full and contains \mathcal{U} total pages (including cover letter).

If you have any questions regarding these test results, please feel free to call.

Sincerely,



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Work Order		Visit our website	www.aesatlanta.com	to check on the status of vour recents nice hotele	orders, etc.			KEMARKS	1 + X 1 5 cm 0 10	-										1' X 1' Sample		11 X 1 5 8m Plo	RECERT	Total \approx of Contanters	Turneound Turne Request	Standard 5 Business Days	O 2 Frusiness Day Rush		O Same Day Rush (auth req.) O Other	ž	E-mail: Y.N. Par' Y-N	TA PACKAGE I II	TAT.
		ANALYSIS REQUESTED					PRESERVATION (See codes)																PROJECT INFORMATION	21 hour Armary		RESS	Nar	ORT TO	INVOICE TO: (IF DIFFERENT FROM ARADE)			POR	SAMPLES RECEIVED AFT FR JFM OR SATURDAY ARE CONSIDERED AS RÉCEIVED ON THE NEXT BUSINESS DAY, IF NO TAT IS MARKED ON COC AES WILL, PROCEED AS STANDARD TAT. SAMPLES ARE DISPOSED OF 30 DAYS AFTER COMPLETION OF REPORT UNLESS OTHER ARRANGEMENTS ARE MADE.
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White Copy - Original: Yellow Copy - Client

Analytical Environmental Services, Inc.

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Sample/Cooler Receipt Checklist

Client GA ARMY		Work Order Number 0807718
Checklist completed by O	7/26/08	
Carrier name: FedEx UPS Courier Client U	S Mail Othe	zi
Shipping container/cooler in good condition?	Yes	No Not Present
Custody seals intact on shipping container/cooler?	Yes	No Not Present
Custody seals intact on sample bottles?	Yes_	No Not Present
Container/Temp Blank temperature in compliance?	7185/08 Yes	No
Cooler #1 Cooler #2 Cooler #3	Cooler #4 _	Cooler#5 Cooler #6
Chain of custody present?	Yes	No
Chain of custody signed when relinquished and received?	Yes N	No
Chain of custody agrees with sample labels?	Yes V	No
Samples in proper container/bottle?	Yes 🗸	No
Sample containers intact?	Yes 🗸	No
Sufficient sample volume for indicated test?	Yes 🗸	No
All samples received within holding time?	Yes 🗸	No
Was TAT marked on the COC?	Yes 🗹 .	No
Proceed with Standard TAT as per project history?	Yes	No Not Applicable 🗸
Water - VOA vials have zero headspace? No VOA vials s	ubmitted 🗹	YesNo
Water - pH acceptable upon receipt?	Yes	No Not Applicable
Adjusted? Sample Condition: Good Other(Explain) (For diffusive samples or AIHA lead) Is a known blank inclu	Che	ecked by
Sample Condition: Good V Other(Explain)		
(For diffusive samples or AIHA lead) Is a known blank inclu	ded? Yes	^s − ^{No} ∀
See Case Narrative for resolution of the Non-Conformance	e.	

* Samples do not have to comply with the given range for certain parameters.

LAQuality Assurance\Checklists Procedures Sign-Off Templates Checklists Sample Receipt Checklists Sample_Cooler_Receipt_Checklist

Analytical Environmental Services, Inc.

Date: 8/4/2008

LEAD ON WIPES (N9100/7082) N7082

CLIENT:	National Guard Bureau Region-South IH	Lab Order:	0807118
Project:	Calhoun Armory	Date Received:	7/25/2008 12:45 PM
Delivery Order	:	Matrix:	Wipe
DO NA			

PO No:

Labora	tory	Client Sample	Results	Units	Report	DF	Date	Date	Analyst
ID		ID			Limit.		Collected	Analyzed	
0807118-	001A	CAL-01	BRL	μg/ft²	20	1	7/25/2008	7/29/2008	Y
0807118-	002A	CAL-02	BRL	µg/ft²	20	1	7/25/2008	7/29/2008	JY
0807118-	003A	CAL-03	BRL	μg/ft²	20	1	7/25/2008	7/29/2008	JY
0807118-	004A	CAL-04	BRL	µg∕ft²	20	1	7/25/2008	7/29/2008	JY
0807118-	005A	CAL-05	BRL	μg/ft²	20	1	7/25/2008	7/29/2008	JY
0807[18-	006A	CAL-06	BRL	μg/ft²	20	1	7/25/2008	7/29/2008	JY
0807118-	007A	CAL-07	BRL	μg/ft²	20	1	7/25/2008	7/29/2008	JY
0807118-	-008A	CAL-08	BRL	μg/ft²	20	1	7/25/2008	7/29/2008	JY
0807118-	009A	CAL-09	BRL	μg/ft²	20	1	7/25/2008	7/29/2008	JY
0807118-	010A	CAL-10	BRL	μg/ft²	20	1	7/25/2008	7/30/2008	JY
0807118-	-011A	CAL-11	BRL	μg/ft²	20	1	7/25/2008	7/31/2008	JY
0807118-	-012A	CAL-12	BRL	μg/ft²	20	1	7/25/2008	7/31/2008	JY
0807118-	013A	CAL-13	BRL	ug, Total	20	1	7/25/2008	7/31/2008	JY
0807I18-	014A	CAL-14	BRL	μg/ft²	20	1	7/25/2008	7/31/2008	JY

Qualifiers:

- ----BRL - Not Detected at the Reporting Limit

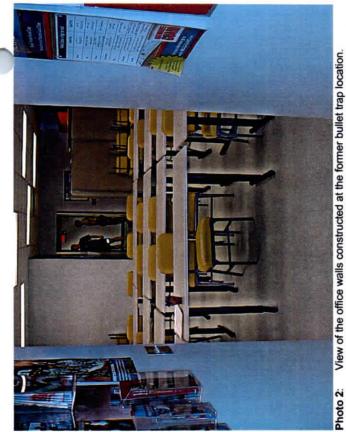
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DF - Dilution Factor

Page 1 of 1 FOIA Requested Record #J-15-0085 (GA) Released by National Guard Bureau Page 58 of 378

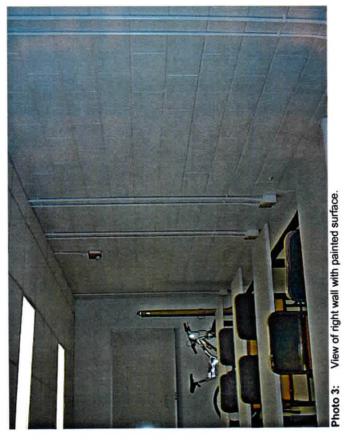








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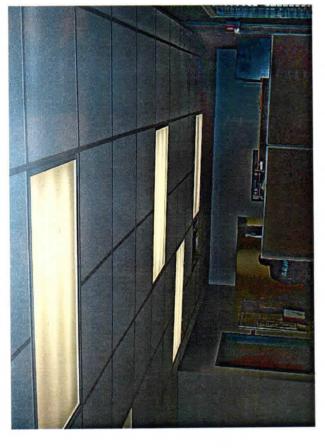
Project Name: Calhoun, Georgia Armory

Date Photos Taken: 25 July 2008

FOIA Requested Record #J-15-0085 (GA) Released by National Guard Bureau Page 59 of 378



View of sample locations on the left wall of the former IFR and vinyl flooring. Photo 5:





Project Name: Calhoun, Georgia Armory

Date Photos Taken: 25 July 2008

View of drop ceiling and acoustical panels observed in the converted



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View of the exposed ceiling inside the electrical room of the former IFR Photo 6:



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NATIONAL GUARD REGION SOUTH INDUSTRIAL HYGIENE OFFICE 510 PLAZA DRIVE, SUITE 1530 COLLEGE PARK, GA 30349

NGB-AVN-SI

17 March 2003

MEMORANDUM FOR THE: Georgia Army National Guard, ATTN: MAJ. Armory Supervisor, HHC 1st Battalion 108th Armor, P.O. Box 36, Calhoun, GA 30703.

SUBJECT: Industrial Hygiene Service Contract for the Georgia Army National Guard, to look at the Calhoun National Guard Armory.

1. References.

a. Report dated 25 January 2003, Industrial Hygiene Survey, Non-Responsive

b. OSHA Standards 29 CFR (Code of Federal Regulations), General Industry, revised 1996 rev.

c. AR 40-5, Preventive Medicine, 15 October 1990.

d. AR 11-34, 15 February 1990, The Army Respiratory Protection Program.

e. AR 385-10, 23 May 1988, Army Safety Program.

f. Department of the Army Pamphlet (DA PAM) 40-501, 27 August 1991, Hearing Conservation.

g. TB MED 503, The Army Industrial Hygiene Program.

h. Title 29 Code of Federal regulation (CFR), 1989 rev, Part 1910.94 (c) (6) Table G-10, Ventilation.

i. Industrial Ventilation, 22nd, 1995, American Conference of Governmental Industrial Hygienist, Cincinnati, Ohio.

j. IES Lighting Handbook, Application Volume, 1981, Illumination Engineering Society of North America.

2. General.

a. At the request of MS. Non-Responsive of the Georgia State Safety and Occupational Health Office, an Industrial Hygiene Service Contract was put together to conduct an Industrial Hygiene survey at the National Guard Armories in GA.

b. Dr. Non-Responsive conducted the survey.

3. Findings. All HHIM field survey forms and survey findings of the report are enclosed. (See ENCL. 1)

4. Recommendations.

a. Follow all recommendations made in reference 1. a. requesting industrial hygiene (IH) services where needed to complete the recommendations.

b. Use the report to help in correcting all deficiencies noted by the contractor.

c. To execute your responsibilities in correcting all deficiencies, coordinate with the FMO the Occupational Health Nurse and the Occupational Safety and Health Office for technical guidance.

5. If additional information is needed about the contractors report, please contact **Non-Responsive** Regional Industrial Hygienist, ARNG-IHS, 1-800-362-0262 OR COMMERCIAL (404) 559-4174.



Regional Industrial Hygienist

CF: NBG-AVN-SH

CF: State Safety Office, GA, ATTN: Mrs Non-Responsive Occupational Health Manager, 5019 Highway 42, Ellenwood, GA 30294.

CF: State Safety Office, GA, ATTN: Safety and Occupational Health Manager, P.O. 5019 Highway 42, Ellenwood, GA 30294.

Non-Responsive

583 GINGER CAKE RD FAYETTTEVILLE, GA 30214 (770) 461-2684

January 25, 2003

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Maj. Non-Responsive GA Army National Guard Armory P. O. Box 36 Calhoun, GA 30703

RE: Baseline Industrial Hygiene Survey

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FINAL REPORT

FOR

BASELINE INDUSTRIAL HYGIENE SURVEY

GEORGIA ARMY NATIONAL GUARD

CALHOUN ARMORY

CALHOUN, GA

DATE:

DECEMBER 13,2002

PREPARED BY

Non-Responsive

583 GINGER CAKE RD FAYETTEVILLE, GA 30214 (770) 461-2684

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FOIA Requested Record #J-15-0085 (GA) Released by National Guard Bureau Page 64 of 378

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1.0 INTRODUCTION

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2.0 INSTRUMENTATION

3.0 FINDINGS

4.0 REFERENCES

Attachment 1 HHIM Forms

- Attachment 2 Laboratory Reports: Deactivated Indoor Firing Range
- Attachment 3 Laboratory Reports: Air Condition System
- Attachment 4 Photographs of Facility
- Attachment 5 Schematic Drawing of Facility

1.0 INTRODUCTION

At the request of the National Guard Bureau South Region Industrial Hygiene Office, Non-Responsive performed a Baseline Industrial Hygiene Survey at the GA ARNG Calhoun Armory. The purpose of the survey was to perform a baseline survey to evaluate health hazards, controls present in the work site, collect lead swipe samples from renovated/inactive or closed Indoor Firing Ranges and perform, illumination survey. And to make recommendations regarding health hazards associated with the work at the Calhoun Armory.

The building was finished in 1955. The facility houses the HHC 1st BN 108th Armor. The armory is used by the troops of the HHC 1st BN 108th Armor for their monthly weekend drills.

The HHC 1st BN 108th Armor with about 123 troops has 10 full time AGR personnel at the time of the survey. The AGR employees are assigned to perform administrative duties Tuesday-Friday 7:00am-5: 30pm. The facility houses administrative areas, a Drill Hall, a Classroom, a Supply Room, a Weapons Vault, a kitchen, and a deactivated Indoor Firing Range that was converted to administration offices many years ago. A schematic drawing of the facility can be found in Attachment 5.

The facility was visually examined and personnel consulted to assess potential hazards present. Health Hazard Information Modules were completed. Illumination survey was performed throughout the facility.

2.0 INSTRUMENTATION/CALIBRATION

The following instrumentation was used to obtain air sampling data and ventilation measurements. All instrumentation was calibrated before and after sampling and all instrumentation was operated according to the manufacturer's recommendations:

Sper Scientific Light Meter

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3.0 FINDINGS

Illumination

Illumination levels were recorded in administration offices, classrooms, drill hall, and supply room. Light measurements were below IES guidelines at the Supply Room office and storage area, 1st SG office, SM office (light fixture out), Retention NCO office (four light fixtures out), Training NCO office (one light fixture out and one with two bulbs out), Personnel office and the classrooms (six light fixtures out). The other areas tested were within IES minimum standards. See Light Readings Table at the end of this section.

Administration

Personnel perform administrative duties that consist of reading, handling and generating paper work. Computer use comprises a large portion of the working day, two to six hours per day. This continuous use of computers can, in the long run, lead to eyestrain and hand/wrist or shoulder soreness. Some of the personnel reported they have experienced either eyestrain or shoulder soreness from the use of computers for long periods of time. (See HHIM forms in attachment 1).

Motor Pool

The motor pool is located in a fenced area in the rear of the building. The motor pool includes 20 M998 HMMWV, 13 M35A2, 1 M1A1, 3,3M577A2 4 M923A2 3 M977, 4 M978, 1 M936, 1 M948E1 and 1 M1038WW. No repair services are performed on these vehicles at the armory. When repairs are needed the vehicles are taken to the OMS Shop located behind the armory.

Drill Hall

The Drill Hall is located in the center at the rear of the building. It is used primarily for drills. The Drill Hall is used to clean weapons about five times a year or when it is cold or raining. Bay door is kept open when the weapons are cleaned. At the time of the survey, a large vehicle was stored inside the Drill Hall. Personnel reported that the vehicles were used for a parade the day before and will be removed from the Drill Hall during that day.

Deactivated Indoor Firing Range

A deactivated Indoor Firing Range (IFR) was been converted into administrative offices many years ago. Personnel stated that it was "sanitized' 7-8 years ago. Six

swipe samples were taken from the IFR. None of the six samples were above the clearance level of 200ug/ft2. See table one for results.

Table 1

Sample Number	Sample Location	Results
15	Bullet backstop area	BRL
11	Master Gunner Office Area	24ug
12	1 at Train. Officer Office	BRL
13	Item 2 at Hallway	BRL
14	Back Office Wall	BRL
16	Blank	BLR

Weapons Vaults

The Calhoun Armory has a weapon storage vault located in the Supply Room. Personnel stated that accountability and issuing of weapons are performed in this area. Weapons are cleaned in the Drill Hall occasionally if it is raining or too cold, in small groups.

A/C System

Central A/C Heating units are used to cool administrative offices and classrooms and the Supply Room. Six swipe samples for Lead (Table 2) were collected from the supply air grills in the offices occupied by full time members of the Army National Guard. None of the samples were above the clearance level of 200ug/ft2.

Table 2

Sample Number	Sample Location	Results
1	Training NCO Office	BLR
2	1 SG Office	BLR
3	Personnel Service NCO Office	20ug
4	Master Gunner Office	22ug
5	Training Officer Office	24ug
6	Blank	BLR

Material Safety Data Sheets

The armory has an MSDS book. It was located on the wall at the Drill Hall. The MSDS forms mainly for household cleaners and a couple for oil cleaners. Several paint cans were kept in a locker. There was no Hazardous Materials Inventory List present.

Light Readings

Light measurements were taken in various locations throughout the facility. The results were compared to guidelines recommended by the Illuminating Engineering Society (IES). The results of the survey are shown in Table 3

Location	Light Reading (footcandles)	IES Recommendation (footcandles)
ADO 1SG Office	12-32 (Avg. 18)	50-100
ADO SM Office	8-31 (Avg. 25)	50-100
ADO Commander Office (Maj.	40-57 (Avg. 50)	50-100
ADO Training Officer Office	37-71 (Avg. 52)	50-100
ADO Personnel Office	26-61 (Avg. 37)	50-100
ADO Master Gunner Office	43-71 (Avg. 54)	50-100
ADO Front Office	11-64 (Avg. 41)	50-100
Classrooms	11-28 (Avg. 21)	50-100
ADO Supply Sergeant Office	22-50 (Avg. 29)	50-100
ADO Supply Room (Storage)	2-39 (Avg. 15)	20
Drill Hall	7-50 (Avg. 46)	30

Table 3

Although the average light measurements taken in the Drill Hall was above IES guidelines, four light bulbs were out. Light measurements were below IES guidelines at the Supply Room office and storage area, 1st SG office, SM office (light fixture out), Retention NCO office(four light fixtures out). Also at the Training NCO office (one light fixture out and one with two bulbs out), Personnel office and the classrooms (six light fixtures out). Consideration should be given to replace burned out light fixtures and/or provide supplemental lighting in those areas that were below the recommended standard. ANSI RP7-1991.

4.REFERENCES

4

- Guide to Occupational Exposure 2000, American Conference of Governmental Industrial Hygienists (ACGIH), Cincinnati, Ohio.
- American National Standards Institute (ANSI), /Illuminating Engineering Society (IES), Industrial Lighting 1991.
- National Institute for Occupational Safety and Health (NIOSH), (76-130) Technical Information, Lead Exposure and Design Considerations for Indoor Firing Ranges GPO, 1975.

- Title 29, Code of Federal Regulations (CFR). 1999, revision, Part 1910. Occupational Safety and Health Standards
- AR 40-5, Preventative Medicine, 15 October 1990.
- AR 385-10, The Army Safety Program, 23 May 1988.
- National Safety Council, Fundamentals of Industrial Hygiene, 4th edition, 1996.
- AR 385-16, National Guard Pamphlet, Safety Guidelines for Converting Indoor Firing Ranges to Other uses.
- TB MED 503, The Army Industrial Hygiene Program, February 1985.
- Department of the Army Pamphlet (DA PAM) 40-501,27 August 1991, Hearing Conservation.
- Title 29 CFR, Part 1910.1200, The Hazard Communication Standard.



RECOMMENDATIONS

- Provide supplemental lighting in those areas that were below the recommended standards as represented in Table 3. Recommend that burned out light fixtures and light bulbs is replaced.
- Recommend that when using computers for extended periods of time, personnel should take occasional breaks and change position to minimize the possibility of eyes and/or hands/wrist injury.
- Continue to ensure that weapon maintenance and cleaning is done in a wellventilated area. Continue to practice good personal hygiene by washing hands after handling and cleaning weapons and ammunition.
- The A/C filter should be replaced according to manufacturers' recommendation.
- A Hazardous Materials Inventory List should be written with current MSDS. A copy should be placed wherever hazardous materials are stored. MSDS book should be updated periodically. Ensure that personnel have knowledge of the location of the MSDS book, and is enrolled hazardous materials safety training.

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Tille 6 U.S. Code. Section 301; Executive Order 9397 authorizes the use of your Social Security Number as a identification number. The purpose of this information is to identify and monitor data relating each DA civilian employee exposed to a heiserdow workplace of operation. The use of this information is to provide historius of exposure for any given worker.

Disclosure of your Social Security Number is not mendatory; however, nondisclosure may result in untimely provision of proper medical maritoring.

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SECTION 6.

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SECTION 6.

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I. HAZARD	L SAMPLE	C. RESULTS	d.
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SECTION 6.

PERSONNEL DATA

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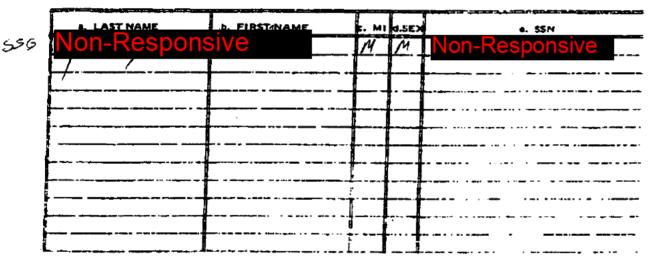
*SEE PRIVACY ACT STATEMENT ON REVERSE.

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SECTION 6.

PERSONNEL DATA



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· PRIVACY ACT STATEMENT

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I. HAZARD	L SAMPLE	C. RESULTS	ď.
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SECTION 6.

PERSONNEL DATA

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SECTION 7. COMMENTS (Add blank sheet of pears if preferant) O Training NCO - Training, Actor schedules, B computer work - 7 her / Day D Occasional soreres at shoulders SECTION 7. . @No ither pro @ Show & Hall pers Zn long periods. s No

· PRIVACY ACT STATEMENT

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Analytical Environmental Servs, Inc.

Date: 1/10/03

TOTAL LEAD IN WIPE SAMPLES N7082

CLIENT: Project: Project No: PO No:	Non-Responsive Calhoun GA Armory Calhoun GA Ar				D N	ab Order: Date Received: Aatrix: Analyst:	0301098 1/6/03 4:05:00 P Wipe MM		
Laboratory ID	Client Sample ID	Results	Units	MDL	DF	Date Collected	Date Analyzed		
0301098-001A	I	BRL	μg, Total	2.83	1	12/13/02	1/7/03		
0301098-002A	2	BRL	μg, Total	2.83	1	12/13/02	1/7/03		
0301098-003A	3	20.0	μg, Total	2.83	1	12/13/02	1/7/03		
0301098-004A	4	22.0	μg, Total	2.83	1	12/13/02	1/7/03		
0301098-005A	5	24.0	μg, Total	2.83	1	12/13/02	1/7/03		
0301098-006A	6	BRL	μg, Total	2.83	1	12/13/02	1/7/03		
0301098-007A	1[24.0	μg, Total	2.83	1	12/13/02	1/7/03		
0301098-008A	12	BRL	μg, Total	2.83	1	12/13/02	1/7/03		
0301098-009A	13	BRL	μg, Total	2.83	1	12/13/02	1/7/03		
0301098-010A	14	BRL	μg, Total	2.83	1	12/13/02	1/7/03		
0301098-011A	15	BRL	μg, Total	2.83	1	12/13/02	1/7/03		
0301098-012A	16	BRL	μg, Total	2.83	1	12/13/02	1/7/03		

Qualifiers:

MDL - Method Detection Limit ND - Not Detected at the Reporting Limit DF - Dilution Factor

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5 3



Calhoun, GA Armory



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A/C Supply Grills



FOIA Requested Record #J-15-0085 (GA) Released by National Guard Bureau Page 91 of 378



Drill Hall



FOIA Requested Record #J-15-0085 (GA) Released by National Guard Bureau Page 92 of 378 BEST AVAILABLE COPY

1.8



IFR Sampling Areas



FOIA Requested Record #J-15-0085 (GA) Released by National Guard Bureau Page 93 of 378 BEST AVAILABLE COPY



IFR Sampling Areas



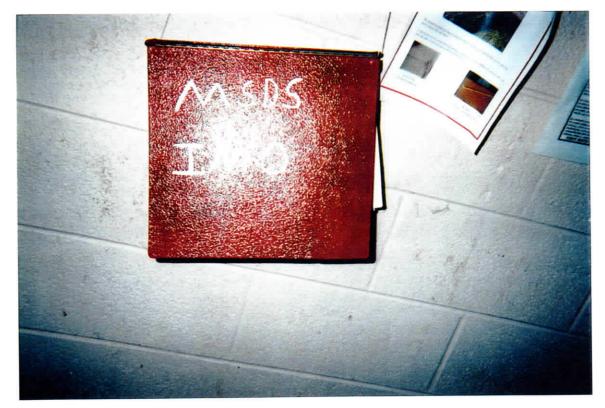
FOIA Requested Record #J-15-0085 (GA) Released by National Guard Bureau Page 94 of 378



Motor Pool



FOIA Requested Record #J-15-0085 (GA) Released by National Guard Bureau Page 95 of 378

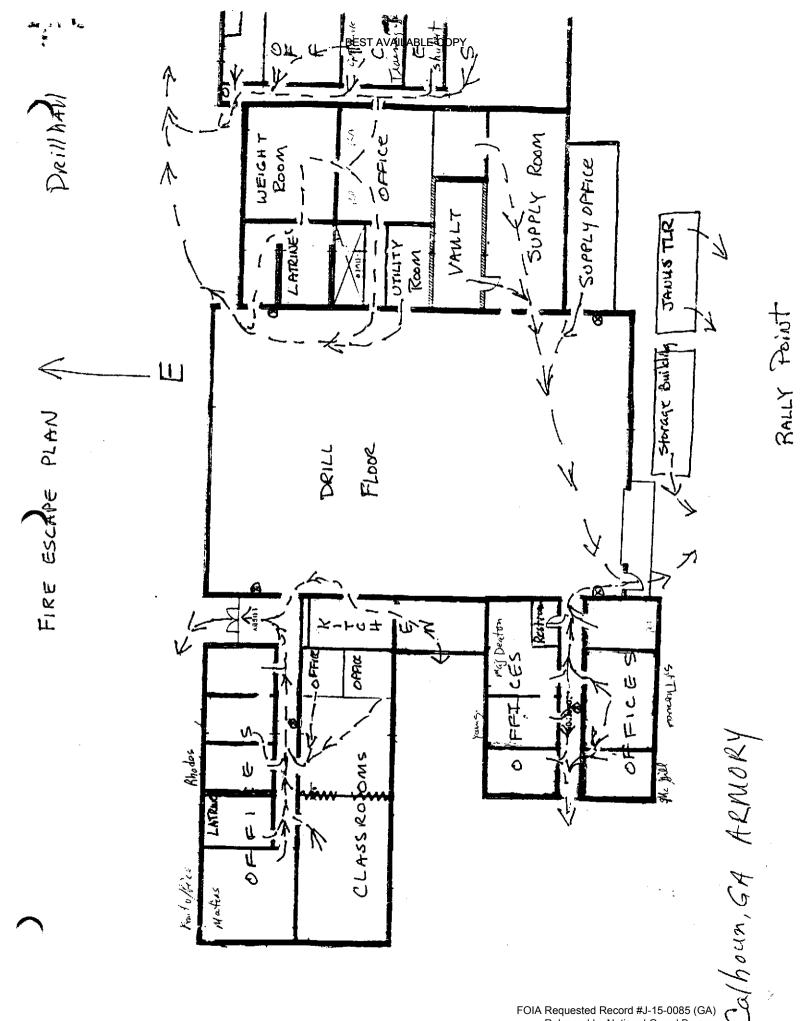


MSDS Forms

Safety Alert Signs



FOIA Requested Record #J-15-0085 (GA) Released by National Guard Bureau Page 96 of 378



FOIA Requested Record #J-15-0085 (GA) , Released by National Guard Bureau Page 97 of 378



NATIONAL GUARD REGION SOUTH INDUSTRIAL HYGIENE OFFICE 510 PLAZA DRIVE, SUITE 1530 COLLEGE PARK, GA 30349

NGB-ARCOV-SEIH

August 19, 2008

MEMORANDUM THRU LT. Deputy State Surgeon, Georgia Army National Guard, Medical Command, 5019 Highway 42, Ellenwood, GA 30294.

TO: Mr Non-Responsive, Georgia Army National Guard, CFMO-Environmental Officer, Post Office Box 437, Hinesville, GA 31315-5066.

SUBJECT: Covington National Guard Armory, Lead Sampling Survey, Covington, Georgia.

1. References.

- Department of Defense Instruction 6055.1, Department of Defense Occupational Safety and Health (OSH) Program, 26 October 1984.
- b. Army Regulation (AR) 40-5, Medical Service, Preventive Medicine, 22 July 2005.
- c. National Guard Regulation (NGR) 385-10, Army National Guard Safety and Occupational Health Program, 1988.
- d. AR 385-10, The Army Safety Program, 29 February 2000.
- e. NGR Pam 420-15, Guidelines and Procedures for Rehabilitation and Conversion of Indoor Firing Ranges, 3 November 2006.
- f. NGR 385-15, Policy and Responsibilities, Evaluation and Operation of Army National Guard Indoor Firing Ranges, 3 November 2006.
- g. DA PAM 40-503, The Army Industrial Hygiene Program, 30 October 2000.
- h. Industrial Ventilation, 23rd Edition, American Conference of Governmental Industrial Hygienist, Cincinnati, Ohio.
- i. Title 29, Code of Federal Regulations (CFR), 2001 rev., part 1910, Occupational Safety and Health Standards.

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FOIA Requested Record #J-15-0085 (GA) Released by National Guard Bureau Page 98 of 378 NGB-ARCOV-SEIH

SUBJECT: Lead Sampling Survey, Covington Armory, Covington, Georgia.

2. General.

- a. As requested by, Georgia Occupational Health Office, personnel with the National Guard Region South Office performed a visual inspection at the Covington, Georgia Armory. The apparent objective of the inspection was to collect surface wipe samples from the former Indoor Firing Range (IFR) for analysis of total lead to confirm/deny the presence of lead dust at concentrations above regulatory standards.
- b. Sergeant (SGT) Non-Responsive with the National Guard Region South Industrial Hygiene Office in College Park Georgia performed the site visit.

3. Findings.

General Information

On July 23, 2008, a site visit was conducted and at the time of the sampling activity, the interior of the former Covington Armory IFR was filled with tables, chairs and miscellaneous office furniture. At the time of the site visit, it appeared that the former IFR was converted to a classroom/training room for the armory. General construction was observed as carpeted floors, drop ceiling with 2 feet by 2 feet acoustical panels, with painted cinder-block walls.

Sampling Activities

Based on the number of surfaces observed, samples were collected in accordance with NG Pam 420-15. Ghost Wipes[™] are pre-moistened media made of non-woven polyvinyl alcohol fiber and approved by American Industrial Hygiene Association (AIHA) for lead sampling. The wipes also meet all American Standards Testing Materials (ASTM) Designation E1792-96E specifications for sampling materials for lead in surface dust.

The surface samples were collected by SGT using a 1 square foot sampling template placed on the surface area identified for sampling. The area within the template was wiped using a new Ghost WipeTM. After the area inside the template was wiped, the sampling media was placed into a labeled re-sealable plastic bag and scaled. After each sample collection, a new surface area template was used and new disposable gloves were donned. A total of 10 samples were collected including three from the former location of the bullet stop, right and left walls for submittal to Analytical Environmental Services, Inc. (AES) in Atlanta, Georgia for subsequent analysis of total lead. In addition, one wipe sample was placed into a re-sealable bag and submitted as field blank samples for analysis.

Laboratory Results

The laboratory results did not indicate the presence of lead concentrations above the IFR post cleaning standard of 200micrograms per feet squared ($\mu g/ft^2$). These sampling results indicate that any previous decontamination activities appear to be adequate to remove the lead dust from the former range at acceptable levels. It should be noted that the sampling activities were completed in a former IFR which has undergone conversion/renovation. Areas above the drop ceiling were not accessed

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NGB-ARCOV-SEIH

SUBJECT: Lead Sampling Survey, Covington Armory, Covington, Georgia.

Sample Number	Sample Location	Laboratory Results ¹
COV-01	Upper Wall, Former Bullet Stop	BRL ²
COV-02	Middle Wall, Former Bullet Stop	BRL
COV-03	Lower Wall, Former Bullet Stop	BRL
COV-04	Upper Right Wall	BRL
COV-05	Middle Right Wall	BRL
COV-06	Lower Right Wall	BRL
COV-07	Lower Left Wall	BRL
COV-08	Middle Left Wall	BRL
COV-09	Upper Left Wall	BRL
COV-10	Field Blank	BRL

The results of the lead dust sampling activities are summarized in the following table.

¹ Results reported in micrograms per square feet (µg/ft²)

² BRL = Below Reportable Limits

The laboratory report including the Chain of Custody records are attached for review.

4. Recommendations.

- a. In as much as the former IFR at the Covington Armory has been converted to a training room, it appears that lead dust is not present at concentrations above the NGB standard. It should be noted that the sampling activities were limited to exposed areas observed inside the former IFR.
- b. In accordance with NGB Pamphlet 420-15, the walls continue lead testing on an annual basis to verify that lead has not migrated from the substrate. The annual sampling shall include areas of the ceiling, walls and floors. Following the annual sampling event, if lead concentrations are less than 200 μ g/ft², the walls of the former IFR shall be coated with a lead dust encapsulant. Conventional paint can not be used as an encapsulant. It should be noted that the referenced guidance document does not address coating the ceiling. However, it is recommended that the ceiling also be coated to prevent potential lead migration from occurring.

5. If additional information is needed about the contractors report, please contact SGT Non-Responsive Regional Industrial Hygiene Technician, 1-800-362-0262 OR COMMERCIAL (404) 559-4174.



Regional Industrial Hygienist

CF: Georgia Army National Guard, ATTN: LT Non-Responsive Deputy State Surgeon Office, 5019 Highway 42, Ellenwood, GA 30294.

NGB-ARCOV-SEIH

SUBJECT: Lead Sampling Survey, Covington Armory, Covington, Georgia.

CF: State Safety Office, GA, ATTN: MAJ Non-Responsive Safety and Occupational Health Manager, 1388 1st Street, Building 840, Dobbins ARB, GA 30069.

CF: Georgia Department of Defense, ATTN: MrNon-Responsive CFMO-ENV Building 21, 935 E. Confederate Avenue, SE, Atlanta, GA 30316.

CF: Georgia Department of Defense, ATTN: Mr. Non-Responsive Facilities Maintenance Manager, Building 12, 935 E. Confederate Avenue, SE, Atlanta, GA 30316.



ANALYTICAL ENVIRONMENTAL SERVICES, INC.

August 01, 2008

Von-Responsive

National Guard Bureau Region-South II4 510 Plaza Drive, Suite 1530 Suite 1530 College Park, GA 30349 TEL: (404) 559-4174

FAX: (404) 559-4175

RE: Covington Armory

Dear Non-Responsive

Order No.: 0807115

Analytical Environmental Services, Inc. received 10 samples on 7/25/2008 12:45:00 PM for the analyses presented in the following report.

No problems were encountered during the analyses. Additionally, all results for the associated Quality Control samples were within EPA and/or AES established limits. Any discrepancies associated with the analyses contained herein will be noted and submitted in the form of a project Case Narrative.

AES' certifications are as follows:

-NELAC/Florida Certification number E87582 for analysis of Environmental Water, soil/hazardous waste, and Drinking Water Microbiology, effective 07/01/08-06/30/09. -AIHA Certification ID #100671 for Industrial flygiene samples (Organics, Inorganics), Environmental Lead (Paint, Soil, Dust Wipes, Air), and Environmental Microbiology (Fungal) effective until 08/01/09.

These results relate only to the items tested. This report may only be reproduced in full and contains \mathcal{U}_{i} total pages (including cover letter).

If you have any questions regarding these test results, please feel free to call.

Sincerely,



MSS TH. LONGSAUTH FOLLARE RONOT 4880 FAX, (770) 4578 40. Image of the factor of th	L et	ite	1.com		niatro:01	0 # 0 <u>N</u>		1 90.				-	BES		VAIL	ALC 1 B	CO	PY				Q	kequest	is Days	45	/ Kush	an req.)		N/X IIIIIIIIIIIIIIIIIIIIIIIIIIIIIIIIIIII
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Analytical Environmental Services, Inc.

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Sample/Cooler Receipt Checklist

Client GA Army Alational		Work Orde	er Number	0807I/5	
	125/08	>		2	
Carrier name: FedEx UPS Courier Client	S Mail Othe	т			
Shipping container/cooler in good condition?	Yes	No	Not Present	: <u></u>	
Custody seals intact on shipping container/cooler?	Yes _	No	Not Present		
Custody seals intact on sample bottles?	Yes ' 7/25/08	No	Not Present	$\underline{\mathcal{L}}$	
Container/Temp Blank temperature in compliance? (4°C+2)*	Yes <u>V</u>	No			
Cooler #12 Cooler #2 Cooler #3	Cooler #4	Co	oler#5	Cooler #6	
Chain of custody present?	Yes L	No			
Chain of custody signed when relinquished and received?	Yes	No			
Chain of custody agrees with sample labels?	Yes _	No			
Samples in proper container/bottle?	Yes	No			
Sample containers intact?	Yes	No			
Sufficient sample volume for indicated test?	Yes 🔄	No			
All samples received within holding time?	Yes _	No			
Was TAT marked on the COC?	Yes 上	No			
Proceed with Standard TAT as per project history?	Yes	No	Not Appli	cable	
Water - VOA vials have zero headspace? No VOA vials s	ubmitted	Yes _	No	_	
Water - pH acceptable upon receipt?	Yes	No	Not Appli	cable L	
Adjusted?	Che	ecked by			
Sample Condition: Good Cother(Explain)					
(For diffusive samples or AIHA lead) Is a known blank inclu	ded? Yes	\$	No		

See Case Narrative for resolution of the Non-Conformance.

* Samples do not have to comply with the given range for certain parameters

McQuality Assurance/Cheeklists Procedures Sign-Off Templates/Cheeklists/Sample Receipt Checklists/Sample Cooler Receipt Checklist

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Analytical Environmental Services, Inc.

Date: 8/5/2008

LEAD ON WIPES (N9100/7082) N7082

CLIENT:	National Guard Bureau Region-South IH	Lab Order:	0807I15				
Project:	Covington Armory	Date Received:	7/25/2008 12:45 PM				
Delivery Ord	er:	Matrix:	Wipe				
PO No:							

Laboratory	Client Sample	Results	Units	Report	DF	Date	Date	Analyst
ID	D			Limit.		Collected	Analyzed	
0807I15-001A	COV-01	BRL	µg/ft²	20	1	7/23/2008	7/29/2008	JY
0807I15-002A	COV-02	BRL	µg∕ft²	20	1	7/23/2008	7/29/2008	JY
0807115-003A	COV-03	BRL	µg/ft²	20	1	7/23/2008	7/29/2008	Л
0807115-004A	COV-04	BRL	µg∕ft²	20	1	7/23/2008	7/29/2008	JY
0807115-005A	COV-05	BRL	μg/ft²	20	1	7/23/2008	7/29/2008	JY
0807I15-006A	COV-06	BRL	µg∕ft²	20	1	7/23/2008	7/29/2008	JY
0807115-007A	COV-07	BRL	µg/ft²	20	1	7/23/2008	7/29/2008	JY
0807115-008A	COV-08	BRL	µg/ft²	20	1	7/23/2008	7/29/2008	JY
0807115-009A	COV-09	BRL	µg/ft²	20	1	7/23/2008	7/29/2008	JY
0807115-010A	COV-10	BRL	μg, Total	20	I	7/23/2008	7/29/2008	JY

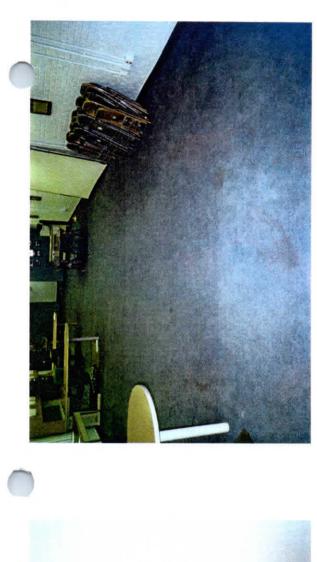
Qualifiers:

BRL - Not Detected at the Reporting Limit

DF - Dilution Factor

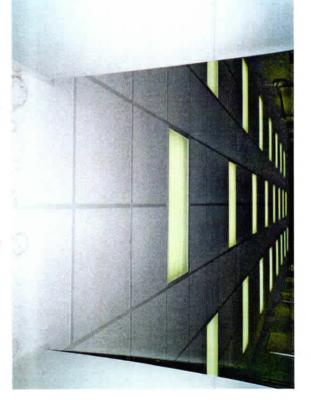
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Photo 1: View of the wall adjacent to the former bullet trap location.



View of the carpeted flooring observed inside the former IFR. Photo 2:



View of right wall with painted surface inside the former IFR. Photo 4:

Photo 3: View of the drop ceiling with acoustical panels.

Project Name: Covington, Georgia Armory



Photo 6: View of the interior of a converted office inside the former IFR.



Photo 5: View of left wall of the former IFR and carpeted flooring.

NATIONAL GUARD REGION SOUTH INDUSTRIAL HYGIENE OFFICE 510 PLAZA DRIVE, SUITE 1530 COLLEGE PARK, GA 30349

NGB-ARS-IHSE

22 May 2006

MEMORANDUM THRU MAJNon-Responsive, Deputy State Surgeon, Georgia Army National Guard, Medical Command, 5019 Highway 42, Ellenwood, GA 30294.

TO: ATTN: Captain Company C, 1st Battalion 108th Armor, 709 West Crawford St., Dalton, Georgia 30720-4130

SUBJECT: Industrial Hygiene follow-up sampling for Lead at the Dalton National Guard Armory

1. References.

a. OSHA Standards 29 CFR (Code of Federal Regulations), General Industry, revised 1996 rev.

b. AR 40-5, Preventive Medicine, 22 July 2005.

c. AR 11-34, 15 February 1990, The Army Respiratory Protection Program.

d. AR 385-10, 29 February 2000, Army Safety Program.

f. TB MED 503, The Army Industrial Hygiene Program, 30 October 2000.

g. Title 29 Code of Federal regulation (CFR), 1989 rev, Part 1910.94 (c) (6) Table G-10, Ventilation.

h. Industrial Ventilation, 25th, 2004, American Conference of Governmental Industrial Hygienist, Cincinnati, Ohio.

Title 29 Code of Federal Regulation (CFR), Part 1910.1025 Lead.

2. General.

a. At the request of Mr. Non-Responsive of the National Guard Region South Industrial Hygiene Office, industrial hygiene follow-up sampling for Lead was conducted 28 April 2006. This sampling was done as a result of the Lead sample results taken during the baseline survey done on 29 November 2005.

b. Ms. Non-Responsive Industrial Hygiene Technician, of the Southeast Regional IH Office conducted the sampling.

3. Findings.

a. Samples were taken in the Old Indoor Firing Range along the left side of the Armory. The Indoor Firing Range was deactivated around 1960. This area has been made into several different functioning areas, which include storage, and weight room. The backstop was located in the area where the room has been cleared now, while the firing line was located where the open classroom/storage is now.

b. Eighteen samples were taken throughout the Old Indoor Firing Range. Results ranged from Below Reporting Limit (BRL) to 242µg/ft².

c. The floors in all the different parts of the Old Indoor Firing Range and the general hallway showed Lead levels above the limit of 40µg/ft².

d. The highest level was in hallway outside the Family Support Room door. This room is being used to store items for Family Support, at the time it was locked.

e. Lead Wipe Sample Results:

Sample Number	Micrograms (μg) Of Lead per Square Foot	Sample Area
0428DAL01	48	Front of room middle of floor by vault in Old IFR
0428DAL02	BRL	First entrance to room, middle of floor at entrance to Old IFR
0428DAL03	72	Floor directly under center of first window in Old IFR
0428DAL04	36	Floor under desk which is to the right of the first window in Old IFR
0428DAL05	BRL	Floor approximately 5 ft in front of desk in Old IFR
0428DAL06	117	Top of file cabinet along right wall behind desk in Old IFR
0428DAL07	BRL	Top of small table approximately 12 ft from first entrance along left wall in Old IFR
0428DAL08	38	Middle of floor in first section of room directly behind long wooden bookcase in Old IFR
0428DAL09	61	Top of file cabinet left of the second window in Old IFR
0428DAL10	124	Footrest of Supercat shoulder press weight machine between 2nd and 3rd windows in Old IFR
0428DAL11	37	Floor in corner of room where the panel wall and right wall meet, under the 3rd window in Old IFR
0428DAL12	64	Floor under fire extinguisher along left wall in Old IFR
0428DAL13	242	Floor in front of Family Support Room, middle of hallway in Old IFR
0428DAL14	87	Floor in front of 2 lockers under windows in Recruiters storage room in Old IFR
0428DAL15	54	Floor at middle of entrance to room, approximately 2 ft back from door in Old IFR

0428DAL16	44	Floor in front right corner of cleared room in back of Old IFR
0428DAL17	30	Floor in middle of cleared room in back of Old IFR
0428DAL18	22	Floor in back left corner of cleared room in back of Old IFR
0428DAL19	BRL	Blank
0428DAL20	BRL	Blank

e. Attached: Sample results, diagram of where samples were taken and pictures.

4. Recommendations.

a. Re-clean floors and items stored in converted Indoor Firing Range of lead following NG PAM's 385-15 and 385-16. Keep in mind that EPA and your state may have lead reduction levels lower than the levels recommended in the 385-15 and 385-16.

b. Use the following report to help in designation of areas of concern and the cleaning of said areas.

c. To execute your responsibilities in correcting all deficiencies, coordinate with the Occupational Health Nurse, the FMO Environmental Office and the Occupational Safety and Health Office for technical guidance.

5. If additional information is needed about this report, please contact Non-Responsive Industrial Hygiene Technician, ARNG-IHS, 1-800-362-0262 OR COMMERCIAL (404) 559-4174.



Regional Industrial Hygienist

CF: State Safety Office, GA, ATTN: Mrs. Non-Responsive Occupational Health Manager, 1648 Perry Street, Building 831, Dobbins ARB, Georgia, 30069.

CF: State Safety Office, GA, ATTN: LTC Non-Responsive Safety and Occupational Health Manager, P.O. 5019 Highway 42, Ellenwood, GA 30294.

General Photo of Old IFR



0428DAL01 Front of room middle of floor by vault in Old IFR



0428DAL02 First entrance to room, middle of floor at entrance to Old IFR



0428DAL03 Floor directly under center of first window in Old IFR



0428DAL04 Floor under desk which is to the right of the first window in Old IFR



0428DAL05 Floor approximately 5 ft in front of desk in Old IFR



0428DAL07 Top of small table approximately 12 ft from first entrance along left wall in Old IFR



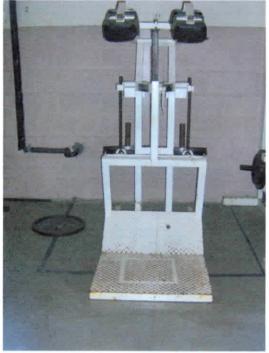
0428DAL08 Middle of floor in first section of room directly behind long wooden bookcase in Old IFR



0428DAL09 Top of file cabinet left of the second window in Old IFR



0428DAL10 Footrest of Supercat shoulder press weight machine between 2nd and 3rd windows in Old IFR



0428DAL11 Floor in corner of room where the panel wall and right wall meet, under the 3rd window in Old IFR





0428DAL12 Floor under fire extinguisher along left wall in Old IFR



0428DAL13 Floor in front of Family Support Room, middle of hallway in Old IFR



Recruiting Storage

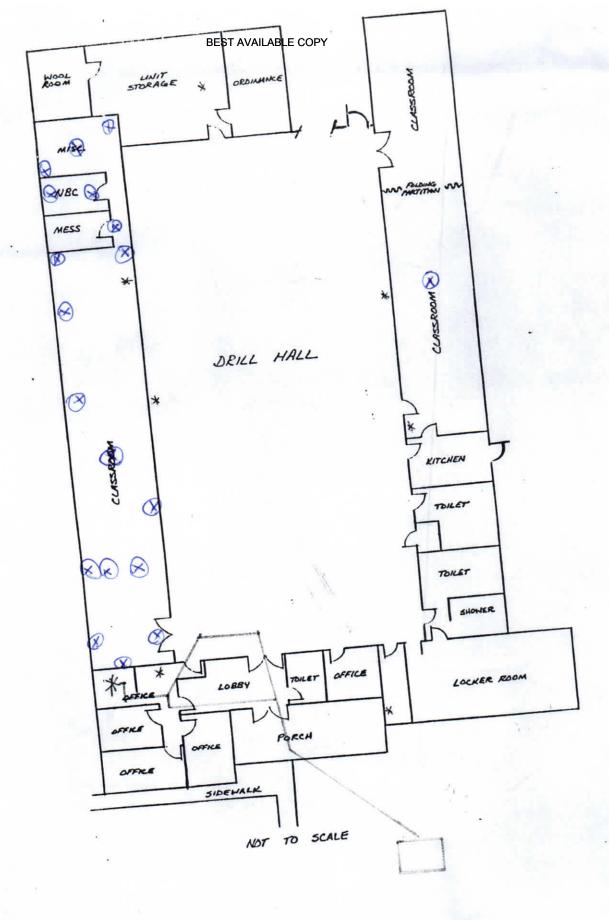


0428DAL14 Floor in front of 2 lockers under windows in Recruiters storage room in Old IFR



0428DAL15 Floor at middle of entrance to room, approximately 2 ft back from door in Old IFR





FOIA Requested Record #J-15-0085 (GA) Released by National Guard Bureau Page 114 of 378

Malytical Environmental Services, Inc.

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Date: 5/9/2006

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TOTAL LEAD IN WIPE SAMPLES N7082

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CLIENT:	National Guard Bureau Region-South IH	Lab Order:	0605233
Project:	Dalton Annory	Date Received:	5/3/2006 1:35 PM
Delivery Orde	r: 060328TNSMY01	Matrix:	Wipe
PO No:			

Laboratory	Client Sample	Results	Units	Report	DF	Date	Date	Analyst
ID	ID			Limit.		Collected	Analyzed	
0605233-001A	0428DAL01	48	μg, Total	20	1	4/28/2006	5/5/2006	VA
0605233-002A	0428DAL02	BRL	µg, Total	20	1	4/28/2006	5/5/2006	VA
0605233-003A	0428DAL03	72	μg, Total	20	1	4/28/2006	5/5/2006	VA
0605233-004A	0428DAL04	36	μg, Total	20	ł	4/28/2006	5/5/2006	VA
0605233-005A	0428DAL05	BRL	µg, Total	20	1	4/28/2006	5/5/2006	VA
0605233-006A	0428DAL06	117	µg, Total	20	i	4/28/2006	5/5/2006	VA
0605233-007A	0428DAL07	BRL	µg, Total	20	1	4/28/2006	5/5/2006	VA
0605233-008A	0428DAL08	38	µg, Total	20	1	4/28/2006	5/5/2006	VA
0605233-009A	0428DAL09	61	µg, Total	20	1	4/28/2006	5/5/2006	VA
0605233-010A	0428DAL10	124	µg, Total	20	1	4/28/2006	5/5/2006	VA
0605233-011A	0428DAL11	37	µg, Total	20	1	4/28/2006	5/5/2006	VA
0605233-012A	0428DAL12	64	µg, Total	20	1	4/28/2006	5/5/2006	VA
0605233-013A	0428DAL13	242	µg, Total	20	1	4/28/2006	5/5/2006	VA
0605233-014A	0428DAL14	87	μg, Total	20	1	4/28/2006	5/5/2006	VA
0605233-015A	0428DAL15	54	µg, Total	20	1	4/28/2006	5/5/2006	VA
0605233-016A	0428DAL16	44	μg, Total	20	1	4/28/2006	5/5/2006	VA
0605233-017A	0428DAL17	30	µg, Total	20	1	4/28/2006	5/5/2006	VA
0605233-018A	0428DAL18	22	µg, Total	20	1	4/28/2006	5/5/2006	VA
0605233-019A	0428DAL19	BRL	μg, Total	20	1	4/28/2006	5/5/2006	VA
0605233-020A	0428DAL20	BRL	µg, Total	20	1	4/28/2006	5/5/2006	VA

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NATIONAL GUARD REGION SOUTH INDUSTRIAL HYGIENE OFFICE 510 PLAZA DRIVE, SUITE 1530 COLLEGE PARK, GA 30349

NGB-AVS-SEIH

11 April 2006

MEMORANDUM THRU MAJNon-Responsive Deputy State Surgeon, Georgia Army National Guard, Medical Command, 5019 Highway 42, Ellenwood, GA 30294.

TO: ATTN: Captain Non-Responsive Detachment 1 HHC, 1st Battalion 108th Armor, 6784 Church St., Douglasville, Georgia 30133

SUBJECT: Industrial Hygiene follow-up sampling for Lead at the Douglasville National Guard Armory

1. References.

a. OSHA Standards 29 CFR (Code of Federal Regulations), General Industry, revised 1996 rev.

b. AR 40-5, Preventive Medicine, 22 July 2005.

c. AR 11-34, 15 February 1990, The Army Respiratory Protection Program.

d. AR 385-10, 29 February 2000, Army Safety Program.

f. TB MED 503, The Army Industrial Hygiene Program, 30 October 2000.

g. Title 29 Code of Federal regulation (CFR), 1989 rev, Part 1910.94 (c) (6) Table G-10, Ventilation.

h. Industrial Ventilation, 25th, 2004, American Conference of Governmental Industrial Hygienist, Cincinnati, Ohio.

i. Title 29 Code of Federal Regulation (CFR), Part 1910.1025 Lead.

2. General.

a. At the request of Mr. Non-Responsive of the National Guard Region South Industrial Hygiene Office, industrial hygiene follow-up sampling for Lead was conducted 15 March 2006. This sampling was done as a result of the Lead sample results taken during the baseline survey done on 7 December 2005.

b. Ms. Non-Responsive Industrial Hygiene Technician, of the Southeast Regional IH Office conducted the sampling.

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3. Findings.

a. Samples were taken in the Old Indoor Firing Range along the left side of the Armory. The Indoor Firing Range was deactivated around 1970. This area has been made into several different functioning areas, which include offices, storage, and weight room. The backstop was located in the area where the weight room is now, while the firing line was located where the Maintenance/Transportation room is now.

b. Twenty-eight samples were taken throughout the Old Indoor Firing Range. Results ranged from Below Reporting Limit (BRL) to 11300µg/ft².

c. The floors of three of the five rooms: Storage/Weight Room, NBC Room, and Maintenance/Transportation Room and the general hallway showed Lead levels above the limit of 40µg/ft².

d. The highest levels were found in the Maintenance/Transportation room. This room is being used to store paper products that are given out for recruitment purposes.

Sample	Micrograms	Sample Area
Number	(μ g)	
	Of Lead	
	per Square	
	Foot	
0315DOUG01	23	Top shelf of desk along back wall in storage room next to
		door in old IFR where backstop was located.
0315DOUG02	365	Floor under desk along back wall in storage room next to
		door in old IFR where backstop was located.
0315DOUG03	BRL	Desk surface on second desk along back wall in storage
		room in old IFR where backstop was located.
0315DOUG04	160	Floor under Bowflex work out equipment in storage room
		in old IFR.
0315DOUG05	44	Top of stereo located along wall between storage room
		and NBC room in old IFR.
0315DOUG06	174	Window sill in storage room in old IFR.
0315DOUG07	49	Foot stand of scale in storage room along wall with drill
		hall in old IFR.
0315DOUG08	62	Floor in hallway of storage room in old IFR.
0315DOUG09	43	Top of wrapped/folded up tent in NBC room in old IFR.
0315DOUG10	22	Area in file storage cabinet, 3 rd shelf, in NBC room in old
		IFR.
0315DOUG11	441	Floor in back left corner of NBC room in old IFR.
0315DOUG12	129	Wooden desk turned on its side on top of metal desk
		along right wall in back right corner of NBC room in old
		IFR.
0315DOUG13	48	Floor at entrance to NBC room inside the room in old IFR.
0315DOUG14	93	Hallway floor along brick wall across from NBC room in
		old IFR.

e. Lead Wipe Sample Results:

Blank	าชย	0315DOUG30
Blank	8 81	0312DONG28
Hallway floor outside Scout Platoon door in old IFR	41	0312DONG28
old IFR.		
ni moor noitstroqanari/sanance/Transportation room in	פאר	0316DOUG27
room in old IFR where firing tine was located.		
Top of plastic tub on floor in Maintenance/Transportation	35	0315DOUG26
IFR where firing line was located.		
Middle of floor of Maintenance/Transportation room in old	212	0312DONG52
room in old IFR where firing line was located.		
Back right comer floor of Maintenance/Transportation	11300	0312DONC54
in old IFR where firing line was located.		
Back left corner floor of Maintenance/Transportation room	2000	0312DONG53
room in old IFR.		
Cabinet lying on side, in front left corner of Scout Platoon	าชย	0312DONG55
Floor tile in middle of Scout Platoon room in old IFR.	1 88	0312DONG51
여여 IFR.		
Floor tile in back right comer of Scout Platoon room in	28	0312DONC50
IFR.		
Floor tile in back left corner of Scout Platoon room in old	53	0312DONG19
Floor in middle of State Defense room in old IFR.	33	0312DONG18
Defense room in old IFR.		
Floor in back left comer under metal deak in State	52	0316DOUG17
State Defense room in old IFR.		
Top of scanner that is sitting on top of black file cabinet in	198	0312DONC16
Detense room in old IFR.		
Top sheft of metal book case in front left corner of State	פאר	0316DOUG15

senioiq e. Attached: Sample results, diagram of where samples were taken and

Recommendations.

and 385-16. may have lead reduction levels lower than the levels recommended in the 385-15 following NG PAM's 385-15 and 385-16. Keep in mind that EPA and your state a. Clean converted Indoor Finng Range (Supply/Storage room) of lead

Occupational Safety and Health Office for technical guidance. the Occupational Health Nurse, the FMO Environmental Office and the b. To execute your responsibilities in correcting all deficiencies, coordinate with

5. If additional information is needed about this report, please contact Misuodsay-uon, Industrial Hygiene Technician, ARNG-IHS, 1-800-362-0262 OK COMMERCIAL (404) 559-4174.

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CE: NBG-AVN-SH

CF: State Safety Office, GA, ATTN: Mrs. Ans. Accupational Health Manager, 1648 Perry Street, Building 831, Dobbins ARB, Georgia, 30069.

CF: State Safety Office, GA, ATTN: LTCanieroda GA 30294. Health Manager, P.O. 5019 Highway 42, Ellenwood, GA 30294.

Date: 3/27/2006

780/N LOTAL LEAD IN WIPE SAVIPLES

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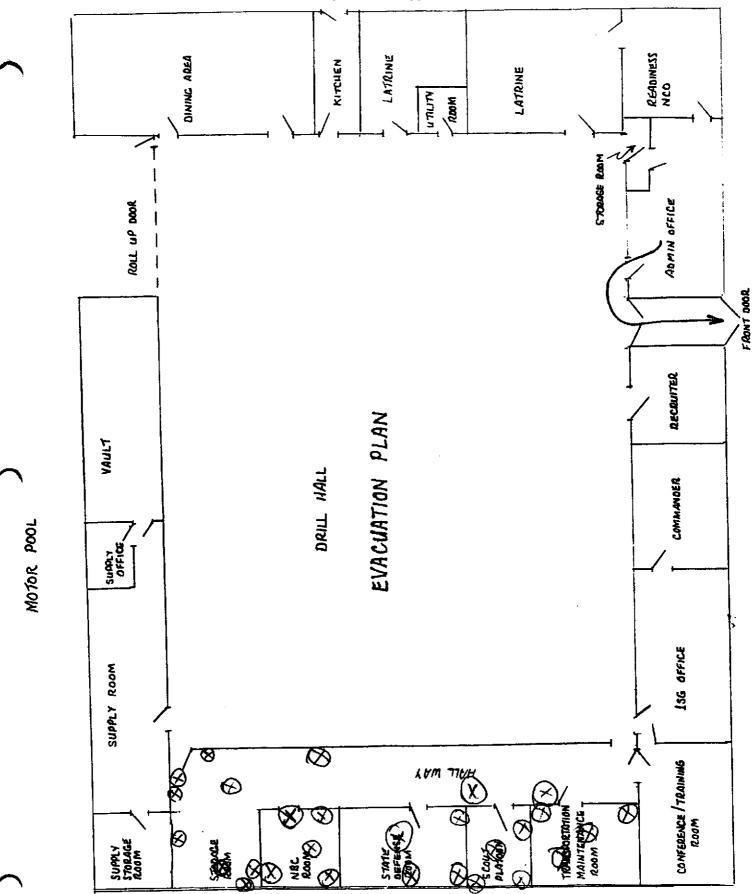
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PICTURE AVAILABLE COPY



Storage Room



0315DOUG01 - Top shelf of desk along back wall in storage room next to door



0315DOUG02 - Floor under desk along back wall in storage room next to door



0315DOUG03 - Desk surface on second desk along back wall in storage room



0315DOUG04 - Floor under Bowflex work out equipment in storage room



0315DOUG05 - Top of stereo located along wall between storage room and NBC room



0315DOUG06 - Window sill in storage room



0315DOUG07 - Foot stand of scale in storage room along wall with drill hall



0315DOUG08 - Floor in hallway of storage room



NBC Room



0315DOUG09 - Top of wrapped/folded up tend in NBC room



0315DOUG10 - Area in file storage cabinet, 3rd shelf in NBC room next to door



0315DOUG11 - Floor in back left corner of NBC room



0315DOUG12 - Wooden desk turned on its side on top of a metal desk along right wall in back right corner of NBC room



0315DOUG13 - Floor at entrance to NBC room, inside the room



0315DOUG14 - Hallway floor along brick wall across from NBC room



State Defense Room



0315DOUG15 - Top shelf of metal book case in front left corner of State Defense room



0315DOUG16 - Top of scanner this is sitting on top of black file cabinet in State Defense room



0315DOUG17 - Floor in back left corner under metal desk in State Defense room



0315DOUG18 - Floor in middle of State Defense room



Scout Platoon room



0315DOUG19 - Floor tile in back left corner of Scout Platoon room



0315DOUG20 - Floor tile in back right corner of Scout Platoon room



0315DOUG21 - Floor tile in middle of Scout Platoon room



0315DOUG22 - Top of cabinet laying on side, in front left corner of Scout Platoon room



Transportation/Maintenance Room



0315DOUG23 - Back left corner floor of Trans/Maint room



0315DOUG24 - Back right corner floor of Trans/Maint room



0315DOUG25 - Middle of floor in Trans/Maint room



0315DOUG26 - Top of Plastic tub on floor in Trans/Maint room



0315DOUG27 - Desk surface outside Trans/Maint door to the right of the door in hallway



0315DOUG28 - Floor outside Scout Platoon door in hallway

NATIONAL GUARD REGION SOUTH INDUSTRIAL HYGIENE OFFICE 510 PLAZA DRIVE, SUITE 1530 COLLEGE PARK, GA 30349

NGB-AVN-SI

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17 March 2003

MEMORANDUM FOR THE: Georgia Army National Guard, ATTN: SSG Armory Supervisor Det 1 HHC 1st Battalion 108th Armor 6784 Church Street, Douglasville, Georgia 30134.

SUBJECT: Industrial Hygiene Service Contract for the Georgia Army National Guard, to look at the Douglasville National Guard Armory.

1. References.

a. Report dated 25 January 2003, Industrial Hygiene Survey, Non-Responsive

b. OSHA Standards 29 CFR (Code of Federal Regulations), General Industry, revised 1996 rev.

c. AR 40-5, Preventive Medicine, 15 October 1990.

d. AR 11-34, 15 February 1990, The Army Respiratory Protection Program.

e. AR 385-10, 23 May 1988, Army Safety Program.

f. Department of the Army Pamphlet (DA PAM) 40-501, 27 August 1991, Hearing Conservation.

g. TB MED 503, The Army Industrial Hygiene Program.

h. Title 29 Code of Federal regulation (CFR), 1989 rev, Part 1910.94 (c) (6) Table G-10, Ventilation.

i. Industrial Ventilation, 22nd, 1995, American Conference of Governmental Industrial Hygienist, Cincinnati, Ohio.

j. IES Lighting Handbook, Application Volume, 1981, Illumination Engineering Society of North America.

2. General.

a. At the request of MS. Non-Responsive of the Georgia State Safety and Occupational Health Office, an Industrial Hygiene Service Contract was put together to conduct an Industrial Hygiene survey at the National Guard Armories in Georgia.

b. Dr. Non-Responsive conducted the survey.

3. Findings. All HHIM field survey forms and survey findings of the report are enclosed. (See ENCL. 1)

4. Recommendations.

a. Follow all recommendations made in reference 1. a. requesting industrial hygiene (IH) services where needed to complete the recommendations.

b. Close this deactivated Indoor firing range until properly decontaminated. Clean the lead hot spots (see sample results) in the Indoor Firing Range following NG PAM's 385-15 and 385-16. Keep in mind that EPA and your state may have lead reduction levels lower than the levels recommend in the 385-15 and 385-16. Clean any and all items stored in the range before removing them.

c. Use the report to help in correcting all deficiencies noted by the contractor.

d. Request follow-up sampling to be conducted as soon as possible once IFR has been decontaminated. Also consider additional Industrial Hygiene services to monitor operations that were not looked at or surveyed during the contract visit, especially if this will help eliminate health hazards and reduce medical surveillance cost.

e. Contact the Occupational Health Nurse, Ms. Non-Responsive for any medical Surveillance that may be needed.

f. To execute your responsibilities in correcting all deficiencies, coordinate with the FMO the Occupational Health Nurse and the Occupational Safety and Health Office for technical guidance.

5. If additional information is needed about the contractors report, please contact Non-Responsive Regional Industrial Hygienist, ARNG-IHS, 1-800-362-0262 OR COMMERCIAL (404) 559-4174.



Regional Industrial Hygienist

CF: NBG-AVN-SH

CF: State Safety Office, GA, ATTN: Mrs. Non-Responsive Occupational Health Manager, 5019 Highway 42, Ellenwood, GA 30294.

CF: State Safety Office, GA, ATTN: Safety and Occupational Health Manager, P.O. 5019 Highway 42, Ellenwood, GA 30294.

Non-Responsive

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583 GINGER CAKE RD FAYETTTEVILLE, GA 30214 (770) 461-2684

January 25, 2003

SSG Non-Responsive

GA Army National Guard Armory 6784 Church St. Douglasville, GA 30134

RE: Baseline Industrial Hygiene Survey

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FINAL REPORT

FOR

BASELINE INDUSTRIAL HYGIENE SURVEY

GEORGIA ARMY NATIONAL GUARD

DOUGLASVILLE ARMORY

DOUGLASVILLE, GA

DATE:

DECEMBER 18,2002

PREPARED BY

Non-Responsive

583 GINGER CAKE RD FAYETTEVILLE, GA 30214 (770) 461-2684

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FOIA Requested Record #J-15-0085 (GA) Released by National Guard Bureau Page 131 of 378

CONTENTS

1.0 INTRODUCTION

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2.0 INSTRUMENTATION

3.0 FINDINGS

4.0 **REFERENCES**

Attachment 1 HHIM Forms

- Attachment 2 Laboratory Reports: Deactivated Indoor Firing Range
- Attachment 3 Laboratory Reports: Air Condition System
- Attachment 4 Photographs of Facility
- Attachment 5 Schematic Drawing of Facility

1.0 INTRODUCTION

At the request of the National Guard Bureau South Region Industrial Hygiene Office, Non-Responsive performed a Baseline Industrial Hygiene Survey at the GA ARNG Douglasville Armory. The purpose of the survey was to perform a baseline survey to evaluate health hazards, controls present in the work site, collect lead swipe samples from renovated/inactive or closed Indoor Firing Ranges and perform, illumination survey. And to make recommendations regarding health hazards associated with the work at the Douglasville Armory.

The building was finished in 1952. The facility houses the Det. 1,HHC 1st BN 108th Armor. The armory is used by the troops of the Det. 1 HHC 1st BN 108th Armor for their monthly weekend drills.

The Det. 1 HHC 1st BN 108th Armor with about 101 troops has 2 full time AGR personnel at the time of the survey. The AGR employees are assigned to perform administrative duties Tuesday-Friday 7:00am-5: 30pm. The facility houses administrative areas, a Drill Hall, a Classroom, a Supply Room, a Weapons Vault, a kitchen, and a deactivated Indoor Firing Range (1969) that was converted to offices and storage areas. A schematic drawing of the facility can be found in Attachment 5.

The facility was visually examined and personnel consulted to assess potential hazards present. Health Hazard Information Modules were completed. Illumination survey was performed throughout the facility.

2.0 INSTRUMENTATION/CALIBRATION

The following instrumentation was used to obtain air sampling data and ventilation measurements. All instrumentation was calibrated before and after sampling and all instrumentation was operated according to the manufacturer's recommendations:

• Sper Scientific Light Meter

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3.0 FINDINGS

Mumination

Illumination levels were recorded in administration offices, classrooms, drill hall, and supply room. Light measurements were below IES guidelines at the Readiness NCO office (computer desks, 18 & 45 FC), Recruiter Office (computer desk 31 FC), Conference/Training Room and the Drill Hall (very low readings). There were also five light bulbs out in the Drill Hall. The other areas tested were within IES minimum standards. See Light Readings Table at the end of this section.

Administration

Personnel perform administrative duties that consist of reading, handling and generating paper work. Computer use comprises a large portion of the working day, two to six hours per day. This continuous use of computers can, in the long run, lead to eyestrain and hand/wrist or shoulder soreness. Some of the personnel reported they have experienced either eyestrain or shoulder soreness from the use of computers for long periods of time. (See HHIM forms in attachment 1).

Motor Pool

The motor pool is located in a fenced area in the rear of the building. The motor pool includes 12 M998 HMMWV, 1 5T, 1 2.5T, and 4 Track vehicles. PMCS performed at the armory. No repair services are performed on these vehicles at the armory. About three times per month, service technicians come from the OMS #9 to perform needed repairs to the armory vehicles. Sometimes vehicles have to be taken to the OMS #9 for repairs.

Drill Hall

The Drill Hall is located in the center of the building. It is used for formation and classes during weekend drills. The Drill Hall is used to clean weapons a few times a year. Bay door is kept open and the exhaust ventilation fan at roof close to bay door is turned on when the weapons are cleaned. They use tables and groups of about 10 people at a time. The Drill Hall is rented out about 4 times a year for wrestling matches or tool sales.

Boiler Room

There is no boiler. There was a water heater in this room.

Deactivated Indoor Firing Range

A deactivated Indoor Firing Range (IFR) was been converted into offices and storage area. Personnel stated that it was deactivated in 1969 Six swipe samples

Table 1

Sample Number	Sample Location	Results
41	Bullet backstop area (weight room now)	78ug
42	Floor front of backstop (weight room now)	7790ug
43	Item 1 stored metal cabinet	65ug
44	Item 2 stored metal shelf	88ug
45	Wall floor next to exit door	905ug
46	Blank	BLR

Weapons Vaults

The Douglasville Armory has a weapon storage vault located in the Supply Room. The weapons list includes M-16s, 50 Cal. Machine guns, M-60 Machine guns and MK19. The dehumidifier is turned on at all times Personnel stated that accountability and issuing of weapons are performed in this area. Weapons are cleaned in the Drill Hall as described on the Drill Hall section.

A/C System

Central A/C units are used to cool and heat administrative offices. The classroom and the Supply Room have window A/C units. Six swipe samples for Lead (Table 2) were collected from the supply air grills in the offices occupied by full time members of the Army National Guard and the filter at the unit. None of the samples were above the clearance level of 200ug/ft2.

Table 2

Sample Number	Sample Location	Results
31	Readiness NCO Office Croft)	BLR
32	Administration Office (Ojeda)	BLR
33	Recruiter Office	BRL
34	A/C unit filter, fan side	BRL
35	A/C unit filter, supply side	42ug
36	Blank	BLR

Material Safety Data Sheets

The armory has an MSDS book located in Readiness NCO Office. There is a note located on the bulletin board at the Drill Hall that explains where the MSDS book is located. The MSDS forms are mainly for household cleaners and weapons cleaning oils. MSDS forms are added to the book when new products arrive. There is a Flammable cabinet with a Hazardous Materials Inventory List. SGT attended Hazardous Materials training on April 2002.

Light Readings

Light measurements were taken in various locations throughout the facility. The results were compared to guidelines recommended by the Illuminating Engineering Society (IES). The results of the survey are shown in Table 3

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Table	3
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Location	Light Reading (footcandles)	IES Recommendation (footcandles)
ADO Readiness NCO Office	18-59 (Avg. 42)	50-100
ADO Administration Office	47-70 (Avg. 57)	50-100
ADO Recruiter Office	31-54 (Avg. 42)	50-100
Classroom	15-95 (Avg. 60)	50-100
Conf./Training Mortar Platoon Room	34-49 (Avg. 40)	50-100
ADO Supply Room (Storage)	17-32 (Avg. 24)	20
Drill Hall	3-12 (Avg. 9)	30

Light measurements were below IES guidelines at the Readiness NCO office (computer desks, 18 & 45 FC), Recruiter Office (computer desk 31 FC), Conference/Training Room and the Drill Hall (very low readings). There were also five light bulbs out in the Drill Hall. Consideration should be given to replace burned out light fixtures and/or provide supplemental lighting in those areas that were below the recommended standard. ANSI RP7-1991.

4.REFERENCES

- Guide to Occupational Exposure 2000, American Conference of Governmental Industrial Hygienists (ACGIH), Cincinnati, Ohio.
- American National Standards Institute (ANSI), /Illuminating Engineering Society (IES), Industrial Lighting 1991.
- National Institute for Occupational Safety and Health (NIOSH), (76-130) Technical Information, Lead Exposure and Design Considerations for Indoor Firing Ranges GPO, 1975.
- Title 29, Code of Federal Regulations (CFR). 1999, revision, Part 1910. Occupational Safety and Health Standards
- AR 40-5, Preventative Medicine, 15 October 1990.
- AR 385-10, The Army Safety Program, 23 May 1988.

- National Safety Council, Fundamentals of Industrial Hygiene, 4th edition, 1996.
- AR 385-16, National Guard Pamphlet, Safety Guidelines for Converting Indoor Firing Ranges to Other uses.
- TB MED 503, The Army Industrial Hygiene Program, February 1985.
- Department of the Army Pamphlet (DA PAM) 40-501,27 August 1991, Hearing Conservation.
- Title 29 CFR, Part 1910 1200, The Hazard Communication Standard.



RECOMMENDATIONS

- Provide supplemental lighting in those areas that were below the recommended standard as represented in Table 3. Recommend that burned out light fixtures and light bulbs is replaced.
- Recommend that when using computers for extended periods of time, personnel should take occasional breaks and change position to minimize the possibility of eyes and/or hands/wrist injury.
- Continue to ensure that weapon maintenance and cleaning is done in a wellventilated area. Continue to practice good personal hygiene by washing hands after handling and cleaning weapons and ammunition.
- The A/C filter should be replaced according to manufacturers' recommendation.
- The MSDS book should be updated periodically. Ensure that personnel have knowledge of the location of the MSDS book, and is enrolled hazardous materials safety training.
- That the state Occupational Safety and Health office review the lead swipe clearance sample results of this facility to determine if the IFR will need further decontamination.

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SECTION 5.

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· PRIVACY ACT STATEMENT

Title 6 U.S. Code, Section 301; Executive Order 9397 sutherizes the use of your Social Security Number as a identification number. The purpus of this information is to identify and monitor data relating each DA civilian employee exposed to a hexardous workplace of operation. The use this information is to provide histories of exposure for any given worker.

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SAMPLING DATA

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SECTION 6.

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· PRIVACY ACT STATEMENT

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SECTION 5.	

SAMPLING DATA

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SECTION 6.

PERSONNEL DATA

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SECTION 7. COMMENTS (Add blank sheet of peper Acciving ford heavy difting C. E A 3, be will be writing only in the inprod to be have for but donat write as leader this circuit out . Nieds 220,

· PRIVACY ACT STATEMENT

Title 5 U.S. Code, Section 301: Executive Order 9397 authorizes the use of your Social Security Number as a identification number. The purput of this information is to identify and monitor data relating each DA civilian employee exposed to a hazardnus workplace of operation. The user this information is to provide histories of exposure for any silern worker.

Disclosure of your Social Security Number is not mendstory; however, nondisclosure may result in untimely provision of proper medical marritories.

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FOIA Requested Record #J-15-0085 (GA) Released by National Guard Bureau Page 145 of 378

Analytical Environmental Servs, Inc.

Date: 1/10/03

TOTAL LEAD IN WIPE SAMPLES N7082

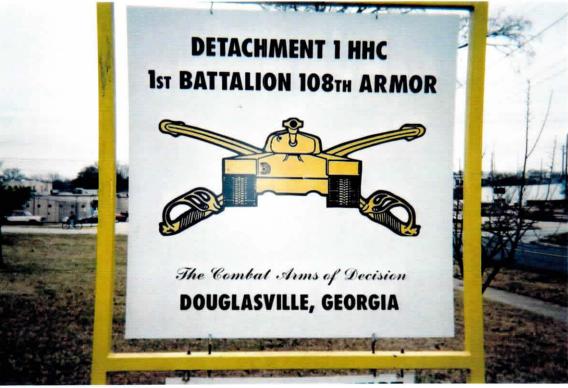
CLIENT: Project: Project No: PO No:	Ion-Responsive Douglasville GA Armo Douglasville GA	гу			D M	ab Order: ate Received: latrix: nalyst:	0301096 1/6/03 4:05:00 P Wipe MM
Laboratory ID	Client Sample ID	Results	Units	MDL	DF	Date Collected	Date Analyzed
0301096-001A	4 1	78.0	μg, Total	2.83	1	12/18/02	1/7/03
0301096-002A	42	7790	μg, Total	22.7	8.01	12/18/02	1/7/03
0301096-003A	43	65.0	μg, Total	2.83	1	12/18/02	1/7/03
0301096-004A	44	88.0	μg, Total	2.83	1	12/18/02	1/7/03
0301096-005A	45	905	μg, Total	2.83	1	12/18/02	1/7/03
0301096-006A	46	BRL	μg, Total	2.83	1	12/18/02	1/7/03
0301096-007A	31	BRL	μg, Total	2.83	i	12/18/02	1/7/03
0301096-008A	32	BRL	μg, Total	2.83	L	12/18/02	1/7/03
0301096-009A	33	BRL	μg, Total	2.83	ı	12/18/02	1/7/03
0301096-010A	34	BRL	μg, Total	2.83	l	12/18/02	1/7/03
0301096-011A	35	42.0	μg, Total	2.83	1	12/18/02	1/7/03
0301096-012A	36	BRL	µg, Total	2.83	1	12/18/02	1/7/03

Qualifiers:

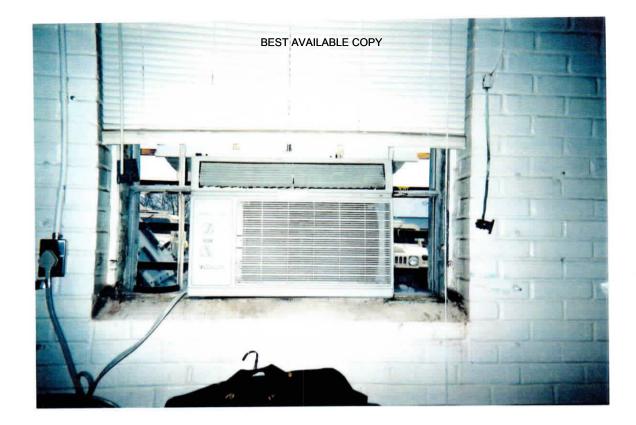
MDL - Method Detection Limit ND - Not Detected at the Reporting Limit DF - Dilution Factor



Douglasville, GA Armory



FOIA Requested Record #J-15-0085 (GA) Released by National Guard Bureau Page 147 of 378



A/C Window Unit Classroom

A/C Heating System Filter





A/C Heating System Supply Grills



FOIA Requested Record #J-15-0085 (GA) Released by National Guard Bureau Page 149 of 378 BEST AVAILABLE COPY

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Drill Hall



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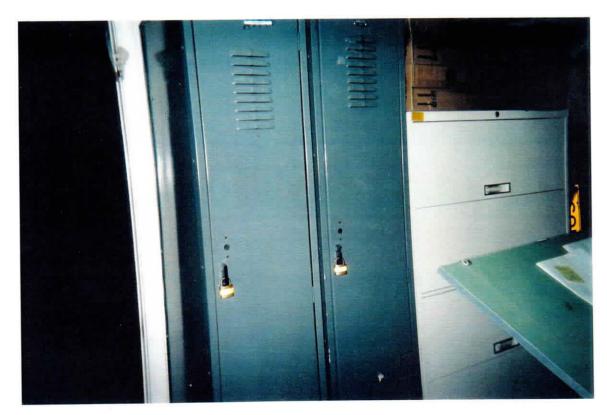
Motor Pool



FOIA Requested Record #J-15-0085 (GA) Released by National Guard Bureau Page 151 of 378 $\gamma = 4$

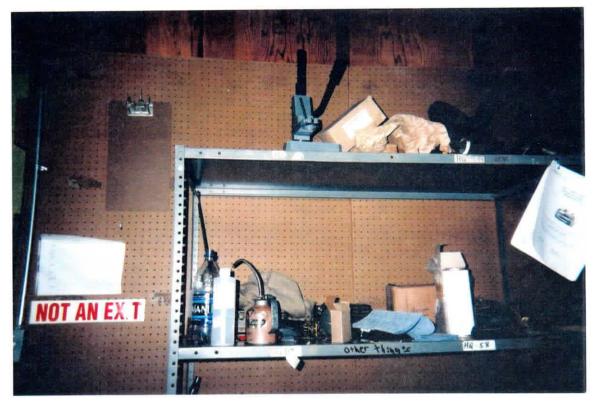


IFR Sampling Areas



FOIA Requested Record #J-15-0085 (GA) Released by National Guard Bureau Page 152 of 378 BEST AVAILABLE COPY

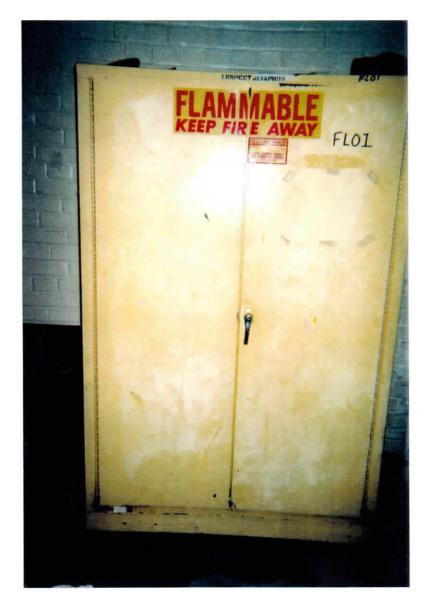
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IFR Sampling Areas



FOIA Requested Record #J-15-0085 (GA) Released by National Guard Bureau Page 153 of 378 5

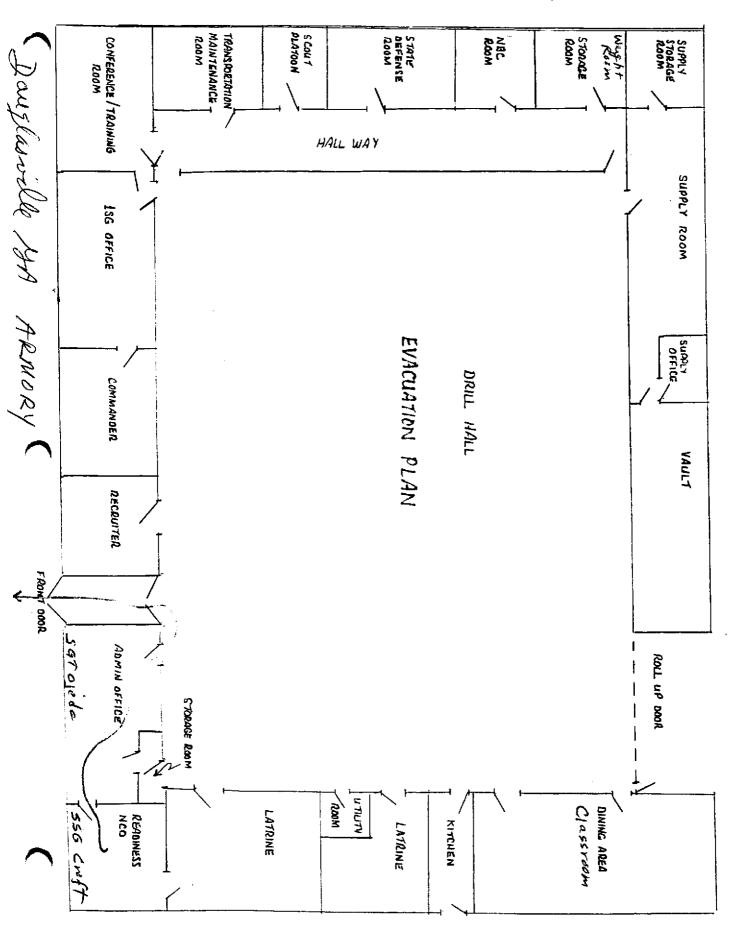


Flammables Cabinet

FOIA Requested Record #J-15-0085 (GA) Released by National Guard Bureau Page 154 of 378 BEST AVAILABLE COPY

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FOIA Requested Record #J-15-0085 (GA) Released by National Guard Bureau Page 155 of 378

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MOTOR POOL

B.

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ARMA A ARMAN

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NATIONAL GUARD REGION SOUTH INDUSTRIAL HYGIENE OFFICE 510 PLAZA DRIVE, SUITE 1530 COLLEGE PARK, GA 30349

NGB-AVN-SEIH

September 9, 2008

MEMORANDUM THRU LT. Montresponsive Deputy State Surgeon, Georgia Army National Guard, Medical Command, 5019 Highway 42, Ellenwood, GA 30294.

TO: Mr. Non-Responsive Georgia Army National Guard, CFMO-Environmental Officer, Post Office Box 437, Hinesville, GA 31315-5066.

SUBJECT: Gainesville National Guard Armory, Lead Sampling Survey, Gainesville, Georgia.

1. References.

- a. Department of Defense Instruction 6055.1, Department of Defense Occupational Safety and Health (OSH) Program, 26 October 1984.
- b. Army Regulation (AR) 40-5, Medical Service, Preventive Medicine, 22 July 2005.
- c. National Guard Regulation (NGR) 385-10, Army National Guard Safety and Occupational Health Program, 1988.
- d. AR 385-10, The Army Safety Program, 29 February 2000.
- e. NGR Pam 420-15, Guidelines and Procedures for Rehabilitation and Conversion of Indoor Firing Ranges, 3 November 2006.
- f. NGR 385-15, Policy and Responsibilities, Evaluation and Operation of Army National Guard Indoor Firing Ranges, 3 November 2006.
- g. DA PAM 40-503, The Army Industrial Hygiene Program, 30 October 2000.
- h. Threshold Limit Values and Biological Exposure Indices (TLV's) for 2003, American Conference of Governmental Industrial Hygienists (ACGIH), Cincinnati, Ohio.
- i. Industrial Ventilation, 23rd Edition, American Conference of Governmental Industrial Hygienist, Cincinnati, Ohio.
- j. Title 29, Code of Federal Regulations (CFR), 2001 rev., part 1910, Occupational Safety and Health Standards.

NGB-AVN-SEIH

SUBJECT: Lead Sampling Survey, Gainesville Armory, Gainesville, Georgia.

2. General.

- a. As requested by, Georgia Occupational Health Office, personnel with the National Guard Region South Office performed a visual inspection at the Gainesville, Georgia site. The apparent objective of the inspection was to collect surface wipe samples from the former Indoor Firing Range (IFR) for analysis of total lead to confirm/deny the presence of lead dust at concentrations above regulatory standards.
- b. Sergeant (SGT) Non-Responsive with the National Guard Region South Industrial Hygiene Office in College Park Georgia performed the site visit.

3. Findings.

General Information

On July 24, 2008, a site visit was conducted and at the time of the sampling activity, the interior of the former IFR was emptied of the bullet stop and firing line. The former IFR appeared to be currently utilized as office space for full-time soldiers. Several desks, tables, chairs, office furniture and physical fitness equipment were observed in the former IFR. The surface areas inside the former IFR were observed to be constructed of cinder-block walls with concrete floors and the ceiling was constructed of concrete-type mesh, with a metal overhead door located adjacent to the former bullet stop location.

Sampling Activities

Based on the number of surfaces observed, samples were collected in accordance with NG Pam 420-15. Ghost Wipes[™] are pre-moistened media made of non-woven polyvinyl alcohol fiber and approved by American Industrial Hygiene Association (AIHA) for lead sampling. The wipes also meet all American Standards Testing Materials (ASTM) Designation E1792-96E specifications for sampling materials for lead in surface dust.

The surface samples were collected by SGT using a 1 square foot sampling template placed on the surface area identified for sampling. The area within the template was wiped using a new Ghost WipeTM. After the area inside the template was wiped, the sampling media was placed into a labeled re-sealable plastic bag and sealed. After each sample collection, a new surface area template was used and new disposable gloves were donned. A total of 16 samples were collected including three from each surface area with the exception of the rear wall of the former IFR. No samples were collected as a result of offices constructed in the area. The collected wipe samples were subsequently submitted to Analytical Environmental Services, Inc. (AES) in Atlanta, Georgia for analysis of total lead. In addition, one wipe sample was placed into a re-sealable bag and submitted as field blank samples for analysis.

Laboratory Results

The laboratory results indicate lead concentrations detected above the IFR post cleaning standard. These sampling results indicate that any previous decontamination activities were not adequate to remove the lead dust from the former range at acceptable levels. In accordance with the National Guard Bureau Pamphlet 420-15, the IFR cannot be converted for other uses until the lead dust levels are reduced to $200\mu g/ft^2$ or lower depending on local requirements.

Sample Number	Sample Location	Laboratory Results ¹
GA-01	Lower Wall, Former Bullet Stop	54
GA-02	Middle Wall, Former Bullet Stop	249
GA-03	Upper Wall, Former Bullet Stop	BRL ²
GA-04	Lower Right Wall	25
GA-05	Middle Right Wall	BRL
GA-06	Upper Right Wall	BRL
GA-07	Lower Left Wall	BRL
GA-08	Middle Left Wall	BRL
GA-09	Upper Left Wall	89
GA-10	Floor at Bullet Former Bullet Stop	20
GA-11	Middle Floor	BRL
GA-12	Floor at Rear of Former IFR	22
GA-13	Ceiling at Former Bullet Stop	147
GA-14	Middle Ceiling	58
GA-15	Ceiling at Rear of Former IFR	BRL
GA-16	Field Blank	BRL

The results of the lead dust sampling activities are summarized in the following table.

¹ Results reported in micrograms per square feet (µg/ft²)

² BRL = Below Reportable Limits

The laboratory report, including the Chain of Custody record is attached for review.

4. Recommendations.

- a. Review NG Bureau Pamphlet 420-15 and perform decontamination of the area identified with greater than 200 μ g/ft². Specifically, the overhead metal door near the former bullet stops location.
- b. Prior to initiating decontamination activities and in accordance with 29 CFR 1910.1025, perform and conduct training for employees exposed to lead concentrations above the standard or who may suffer skin or eye irritation from exposure to lead.
- c. Ensure that appropriate personal protective equipment is worn during decontamination activities.
- d. Consult with local Environmental Agency for guidance on proper disposal of materials used in decontaminating the IFR.
- e. Following the sampling event, if lead concentrations are less than 200 $\mu g/ft^2$, the walls and floor of the former IFR shall be coated with a lead dust encapsulant. Conventional paint can not be used as an encapsulant. It should be noted that the referenced guidance document does not address coating the ceiling.

SUBJECT: Lead Sampling Survey, Gainesville Armory, Gainesville, Georgia.

f. In accordance with NGB Pamphlet 420-15, continue lead testing on an annual basis to verify that lead has not migrated from the substrate. The annual sampling shall include areas of the ceiling, walls and floors.

5. If additional information is needed about the contractors report, please contact SGT Non-Responsive Regional Industrial Hygiene Technician, 1-800-362-0262 OR COMMERCIAL (404) 559-4174.



Regional Industrial Hygienist

CF: Georgia Army National Guard, ATTN: LT Non-Responsive Deputy State Surgeon Office, 5019 Highway 42, Ellenwood, GA 30294.

CF: State Safety Office, GA, ATTN: MAJ. Non-Responsive Safety and Occupational Health Manager, 1388 1st Street, Building 840, Dobbins ARB, GA 30069.

CF: Georgia Department of Defense, ATTN: Mr. Non-Responsive CFMO-ENV Building 21, 935 E. Confederate Avenue, SE, Atlanta, GA 30316.

CF: Georgia Department of Defense, ATTN: Mr. Non-Responsive Facilities Maintenance Manager, Building 12, 935 E. Confederate Avenue, SE, Atlanta, GA 30316.

BEST AVAILABLE COPY



ANALYTICAL ENVIRONMENTAL SERVICES, INC.

August 06, 2008

Non-Responsive

National Guard Bureau Region-South III 510 Plaza Drive, Suite 1530 Suite 1530 College Park, GA 30349 TEL: (404) 559-4174 FAX: (404) 559-4175

RE: Gainesville GA Armory

Dear Non-Responsive

Order No.: 0807122

Analytical Environmental Services, Inc. received 16 samples on 7/25/2008 12:45:00 PM for the analyses presented in the following report.

No problems were encountered during the analyses. Additionally, all results for the associated Quality Control samples were within EPA and/or AES established limits. Any discrepancies associated with the analyses contained herein will be noted and submitted in the form of a project Case Narrative.

AES' certifications are as follows:

-NELAC/Florida Certification number E87582 for analysis of Environmental Water, soil/hazardous waste, and Drinking Water Microbiology, effective 07/01/08-06/30/09. -AlHA Certification ID #100671 for Industrial Hygiene samples (Organics, Inorganics), Environmental Lead (Paint, Soil, Dust Wipes, Air), and Environmental Microbiology (Fungal) effective until 08/01/09.

These results relate only to the items tested. This report may only be reproduced in full and contains $\underline{5}$ total pages (including cover letter).

If you have any questions regarding these test results, please feel free to call.

Sincerely,



3785 PRESIDENTIAL PARKWAY • ATLANTA, GEORGIA 30340 • TEL: (770) 457-8177 • FAX: (770) 457-8188

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Analytical Environmental Services, Inc.

Sample/Cooler Receipt Checklist

client GA ARMY		Work Order Number 0807722
Signature / Date		
Carrier name: FedEx UPS Courier Client / US	S Mail Othe	er
Shipping container/cooler in good condition?	Yes L	No Not Present
Custody seals intact on shipping container/cooler?	Yes	No Not Present
Custody seals intact on sample bottles?	125/08	No Not Present
Container/Temp Blank temperature in compliance? (4%22)	Yes	No
Cooler #1 ambient Cooler #2 Cooler #3	Cooler #4	Cooler#5 Cooler #6
Chain of custody present?	Yes 🖌	No
Chain of custody signed when relinquished and received?	Yes 🗹	No
Chain of custody agrees with sample labels?	Yes 1	No
Samples in proper container/bottle?	Yes 🗹	No
Sample containers intact?	Yes 🚺	No
Sufficient sample volume for indicated test?	Yes 🗸	No
All samples received within holding time?	Yes 🗹	No
Was TAT marked on the COC?	Yes	No
Proceed with Standard TAT as per project history?	Yes _	No Not Applicable
Water - VOA vials have zero headspace? No VOA vials s	submitted \checkmark	Yes <u>No</u>
Water - pH acceptable upon receipt?	Yes	No Not Applicable
Adjusted?	Ch	hecked by
Sample Condition: Good // Other(Explain)		. /
(For diffusive samples or AIHA lead) Is a known blank inclu	ided? Ye	es No
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See Case Narrative for resolution of the Non-Conformance.

* Samples do not have to comply with the given range for certain parameters.

L Quality Assurance Checklists Procedures Sign-Off Templates Checklists Sample Receipt Checklists Sample_Cooler_Receipt_Checklist

Analytical Environmental Services, Inc.

Date: 8/6/2008

LEAD ON WIPES (N9100/7082) N7082

CLIENT:	National Guard Bureau Region-South IH	Lab Order:	0807I22
Project:	Gainesville GA Armory	Date Received:	7/25/2008 12:45 PM
Delivery Order:		Matrix:	Wipe

PO No:

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Laboratory	Client Sample	Results	Units	Report	DF	Date	Date	Analyst
ID	D			Limit.		Collected	Analyzed	
0807122-001A	GA-01	54	μg/ft²	20	l	7/24/2008	7/31/2008	JY
0807122-002A	GA-02	249	μg/ft²	20	1	7/24/2008	7/31/2008	ΥĽ
0807122-003A	GA-03	BRL	μg/ft²	20	1	7/24/2008	7/31/2008	JY
0807122-004A	GA-04	25	μg/ft²	20	1	7/24/2008	7/31/2008	JY
0807122-005A	GA-05	BRL	μg/ft²	20	1	7/24/2008	7/31/2008	JY
0807122-006A	GA-06	BRL	μg/tt²	20	1	7/24/2008	7/31/2008	JY
0807122-007A	GA-07	BRL	μg/ft²	20	1	7/24/2008	7/31/2008	JY
0807122-008A	GA-08	BRL	μg/ft²	20	1	7/24/2008	7/31/2008	JY
0807122-009A	GA-09	89	μg/ft²	20	1	7/24/2008	7/31/2008	JY
0807122-010A	GA-10	20	μg/ft²	20	1	7/24/2008	7/31/2008	JY
0807122-011A	GA-11	BRL	μg/ft²	20	1	7/24/2008	7/31/2008	Yt
•	GA-12	22	μg/ft²	20	1	7/24/2008	7/31/2008	Л
0807122-012A	GA-12 GA-13	147	μg/ft²	20	1	7/24/2008	7/31/2008	JY
0807122-013A		58	μg/ft²	20	1	7/24/2008	7/31/2008	JY
0807122-014A	GA-14			20 20	1	7/24/2008	7/31/2008	ΥĮ
0807122-015A	GA-15	BRL	µg/ft² 	20	1	7/24/2008	7/31/2008	JY
0807I22-016A	GA-16	BRL	ug, Total	20	1	112712000		

..... Qualifiers:

. . . .

BRL - Not Detected at the Reporting Limit

- -

_____ **DF** - Dilution Factor

Page 1 of 1

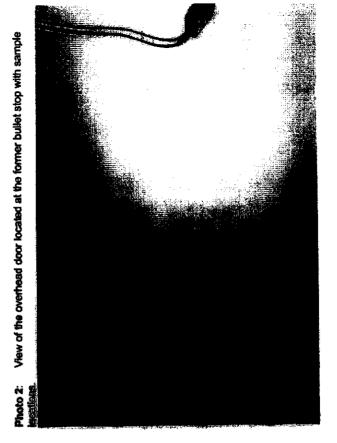
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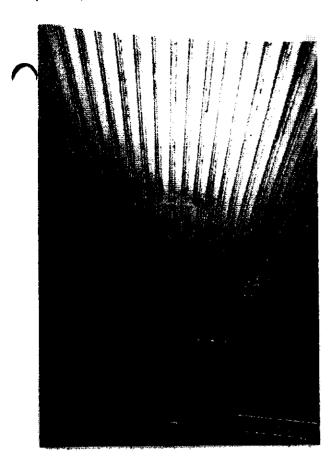
FOIA Requested Record #J-15-0085 (GA) Released by National Guard Bureau Page 164 of 378

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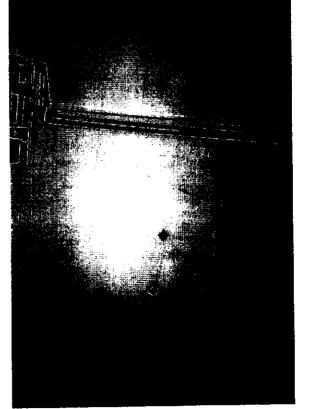
Photo 4: View of left wall with sample location.







Project Name: Gainesville, Georgia Armory



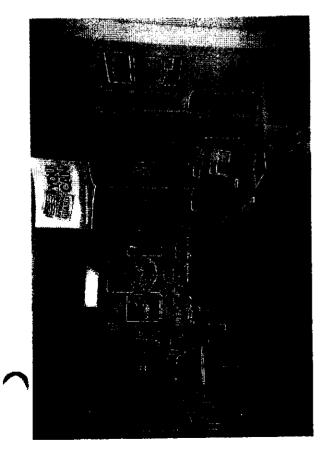


Photo 1: View of the constructed offices located at the entrance of the former IFR.

FOIA Requested Record #J-15-0085 (GA) Released by National Guard Bureau Page 165 of 378

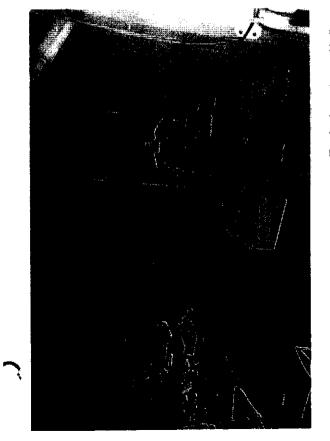
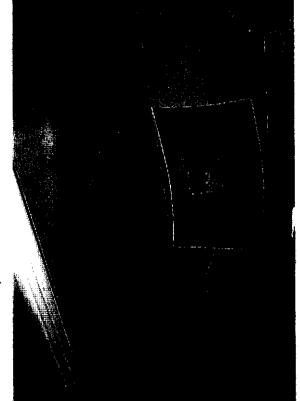


Photo 5: View of the concrete flooring, right wall and office furniture observed in the former IFR.



Photo 7: View of ceiling of the former IFR.

Date Photos Taken: 24 July 2008



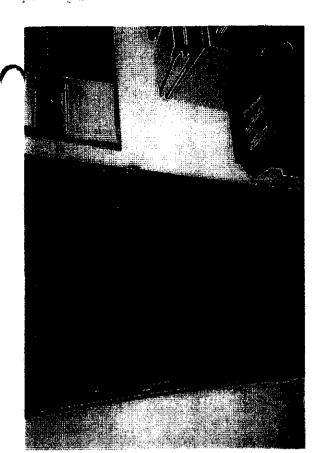


Photo 6: View of the exposed concrete floor.

FOIA Requested Record #J-15-0085 (GA) Released by National Guard Bureau Page 166 of 378

NATIONAL GUARD REGION SOUTH INDUSTRIAL HYGIENE OFFICE 510 PLAZA DRIVE, SUITE 1530 COLLEGE PARK, GA 30349

NGB-ARS-SEIH

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15 March 2010

MEMORANDUM THRU CPT^{Non-Responsive}Deputy State Surgeon, Georgia Army National Guard, Medical Command, 5019 Highway 42, Ellenwood, GA 30294.

TO: Georgia Department of Defense, ATTN: Mr. Non-Responsive Facilities Maintenance Manager, Building 12, 935 E. Confederate Avenue, SE, Atlanta, GA 30316.

SUBJECT: Gainesville National Guard Armory, Lead Sampling Survey 23 February 2010, Gainesville, Georgia.

1. References.

- a. Department of Defense Instruction 6055.1, Department of Defense Occupational Safety and Health (OSH) Program, 26 October 1984.
- b. Army Regulation (AR) 40-5, Medical Service, Preventive Medicine, 22 July 2005.
- c. National Guard Regulation (NGR) 385-10, Army National Guard Safety and Occupational Health Program, 1988.
- d. AR 385-10, The Army Safety Program, 29 February 2000.
- e. NGR Pam 420-15, Guidelines and Procedures for Rehabilitation and Conversion of Indoor Firing Ranges, 3 November 2006.
- f. NGR 385-15, Policy and Responsibilities, Evaluation and Operation of Army National Guard Indoor Firing Ranges, 3 November 2006.
- g. DA PAM 40-503, The Army Industrial Hygiene Program, 30 October 2000.
- h. Industrial Ventilation, 23rd Edition, American Conference of Governmental Industrial Hygienist, Cincinnati, Ohio.
- i. Title 29, Code of Federal Regulations (CFR), 2001 rev., part 1910, Occupational Safety and Health Standards.

2. General.

t;

- a. As requested by Mr Non-Responsive Facilities Maintenance Manager, Clearance sampling was conducted at the referenced site. The objective of the visit was to determine if the Indoor Firing Range was free of lead after clean-up by contractor.
- b. Mr. Non-Responsive Regional Industrial Hygienist with the National Guard Region South Industrial Hygiene Office in College Park Georgia performed the lead sampling.

3. Findings. The laboratories results indicate that all samples collected after the clean-up by the contractor were below the level of detection.

4. Recommendations. None.

5. If additional information is needed about the contractors report, please contact **Non-Responsive** Regional Industrial Hygienist at 1-800-362-0262 OR COMMERCIAL (404) 559 4174



Regional Industrial Hygienist

CF: Georgia Army National Guard, ATTN: LTNon-Responsive Deputy State Surgeon Office, 5019 Highway 42, Ellenwood, GA 30294.

CF: State Safety Office, GA, ATTN: MAJ.Non-Responsive Safety and Occupational Health Manager, 1388 1st Street, Building 840, Dobbins ARB, GA 30069.

CF: Georgia Department of Defense, ATTN: Mr. Non-Responsive CFMO-ENV Building 21, 935 E. Confederate Avenue, SE, Atlanta, GA 30316.

Mr.Non-Responsive, Georgia Army National Guard, CFMO-Environmental Officer, Post Office Box 437, Hinesville, GA 31315-5066.



NATIONAL GUARD REGION SOUTH INDUSTRIAL HYGIENE OFFICE 510 PLAZA DRIVE, SUITE 1530 COLLEGE PARK, GA 30349

NGB-AVN-SEIH

September 9, 2008

MEMORANDUM THRU LT. Deputy State Surgeon, Georgia Army National Guard, Medical Command, 5019 Highway 42, Ellenwood, GA 30294.

TO: MrNon-Responsive Georgia Army National Guard, CFMO-Environmental Officer, Post Office Box 437, Hinesville, GA 31315-5066.

SUBJECT: Lagrange National Guard Armory, Lead Sampling Survey, Lagrange, Georgia.

1. References.

- a. Department of Defense Instruction 6055.1, Department of Defense Occupational Safety and Health (OSH) Program, 26 October 1984.
- b. Army Regulation (AR) 40-5, Medical Service, Preventive Medicine, 22 July 2005.
- c. National Guard Regulation (NGR) 385-10, Army National Guard Safety and Occupational Health Program, 1988.
- d. AR 385-10, The Army Safety Program, 29 February 2000.
- e. NGR Pam 420-15, Guidelines and Procedures for Rehabilitation and Conversion of Indoor Firing Ranges, 3 November 2006.
- f. NGR 385-15, Policy and Responsibilities, Evaluation and Operation of Army National Guard Indoor Firing Ranges, 3 November 2006.
- g. DA PAM 40-503, The Army Industrial Hygiene Program, 30 October 2000.
- h. Threshold Limit Values and Biological Exposure Indices (TLV's) for 2003, American Conference of Governmental Industrial Hygienists (ACGIH), Cincinnati, Ohio.
- i. Industrial Ventilation, 23rd Edition, American Conference of Governmental Industrial Hygienist, Cincinnati, Ohio.
- j. Title 29, Code of Federal Regulations (CFR), 2001 rev., part 1910, Occupational Safety and Health Standards.

NGB-AVN-SEIH

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SUBJECT: Lead Sampling Survey, Lagrange Armory, Lagrange, Georgia.

2. General.

- a. As requested by, Georgia Occupational Health Office, personnel with the National Guard Region South Office performed a visual inspection at the referenced site. The apparent objective of the inspection was to collect surface wipe samples from the former Indoor Firing Range (IFR) for analysis of total lead to confirm/deny the presence of lead dust at concentrations above regulatory standards.
- b. Sergeant (SGT) Non-Responsive with the National Guard Region South Industrial Hygiene Office in College Park Georgia performed the site visit.

3. Findings.

General Information

On August 15, 2008, a site visit was conducted and at the time of the sampling activity, the interior of the former IFR appeared to have undergone conversion to a classroom, with tables, wall lockers and chairs observed at the time the survey was conducted. The flooring was observed to be covered with vinyl floor tile and there was a drop ceiling present completed with acoustical ceiling panels. Painted brick walls were observed and there were five offices constructed in the former IFR completed with sheetrock walls. There was however exposed concrete flooring and original ceiling materials observed inside the electrical room of the converted IFR. As a result of the completed renovations, sampling locations were limited to exposed surfaces, concrete flooring and ceiling materials in the electrical room as well as the vinyl floor covering.

Sampling Activities

Based on the number of surfaces observed, samples were collected in accordance with NG Pam 420-15. Dust sample were collected Ghost WipesTM which are pre-moistened media made of non-woven polyvinyl alcohol fiber and approved by American Industrial Hygiene Association (AIHA) for lead sampling. The wipes also meet all American Standards Testing Materials (ASTM) Designation E1792-96E specifications for sampling materials for lead in surface dust.

The surface samples were collected by SGT using a 1 square foot sampling template placed on the surface area identified for sampling. The area within the template was wiped using a new Ghost WipeTM. After the area inside the template was wiped, the sampling media was placed into a labeled re-sealable plastic bag and sealed. After each sample collection, a new surface area template was used and new disposable gloves were donned. A total of 15 samples were collected from the exposed surface areas. The collected samples were transported to Analytical Environmental Services, Inc. (AES) in Atlanta, Georgia for subsequent analysis of total lead. In addition, one wipe sample was placed into a re-sealable bag and submitted as field blank samples for analysis.

Laboratory Results

The laboratory results did not indicate the presence of lead concentrations above the IFR post cleaning standard of 200 micrograms per feet squared ($\mu g/ft^2$). These sampling results indicate that any previous decontamination activities appear to be adequate to remove the lead dust from the former range at acceptable levels. It should be noted that

the sampling activities were completed in a former IFR which has undergone conversion/renovation.

Sample Number	Sample Location	Laboratory Results ¹
LA-01	Lower Wall at Former Bullet Stop	BRL ²
LA-02	Middle Wall at Former Bullet Stop	BRL
LA-03	Lower Right Wall	BRL
LA-04	Middle Right Wall	BRL
LA-05	Upper Right Wall	BRL
LA-06	Lower Left Wall	BRL
LA-07	Middle Left Wall	BRL
LA-08	Upper Left Wall	BRL
LA-09	Floor at Former Bullet Stop	BRL
LA-10	Floor, Middle of Former IFR	BRL
LA-11	Floor, Rear of Former IFR	BRL
LA-12	Tabletop in Office at Former Bullet Stop	BRL
LA-13	Metal Wall Locker Top	BRL
LA-14	Exposed Ceiling in Electrical Room	BRL
LA-15	Field Blank	BRL

The results of the lead dust sampling activities are summarized in the following table.

¹ Results reported in micrograms per square feet ($\mu g/ft^2$) ² RPI = Release Dependent black in the set

² BRL = Below Reportable Limits

The laboratory report, including the Chain of Custody record is attached for review.

4. Recommendations.

- a. In as much as the former IFR at the Lagrange Armory has been converted to a training room, it appears that lead dust is not present at concentrations above the NGB standard. It should be noted that the sampling activities were limited to exposed areas observed inside the former IFR.
- b. In accordance with NGB Pamphlet 420-15, continue lead testing on an annual basis to verify that lead has not migrated from the substrate. The annual sampling shall include areas of the ceiling, walls and floors. Following the annual sampling event, if lead concentrations are less than 200 μ g/ft², the walls of the former IFR shall be coated with a lead dust encapsulant. Conventional paint can not be used as an encapsulant. It should be noted that the referenced guidance document does not address coating the ceiling. However, it appears that the presence of the drop ceiling with acoustical ceiling panels would be sufficient barrier to prevent potential lead migration and exposure.

NGB-AVN-SEIHBEST AVAILABLE COPYSeptember 9, 2008SUBJECT: Lead Sampling Survey, Lagrange Armory, Lagrange, Georgia.

5. If additional information is needed about the contractors report, please contact SGT Non-Responsive Regional Industrial Hygiene Technician, 1-800-362-0262 OR COMMERCIAL (404) 559-4174.



Regional Industrial Hygienist

CF: Georgia Army National Guard, ATTN: LTNon-Responsive Deputy State Surgeon Office, 5019 Highway 42, Ellenwood, GA 30294.

CF: State Safety Office, GA, ATTN: MAJ. Non-Responsive, Safety and Occupational Health Manager, 1388 1st Street, Building 840, Dobbins ARB, GA 30069.

CF: Georgia Department of Defense, ATTN: Mr. Non-Responsive CFMO-ENV Building 21, 935 E. Confederate Avenue, SE, Atlanta, GA 30316.

CF: Georgia Department of Defense, ATTN: Mr. Non-Responsive Facilities Maintenance Manager, Building 12, 935 E. Confederate Avenue, SE, Atlanta, GA 30316.

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ANALYTICAL ENVIRONMENTAL SERVICES, INC.

August 22, 2008

Non-Responsive

National Guard Bureau Region-South IH 510 Plaza Drive, Suite 1530 Suite 1530 College Park, GA 30349

TEL: (404) 559-4174 FAX (404) 559-4175

RE: Lagrange Armory

Dean Non-Responsive

Order No.: 0808A23

Analytical Environmental Services, Inc. received 15 samples on 8/15/2008 2:05:00 PM for the analyses presented in the following report.

No problems were encountered during the analyses. Additionally, all results for the associated Quality Control samples were within EPA and/or AES established limits. Any discrepancies associated with the analyses contained herein will be noted and submitted in the form of a project Case Narrative.

AES' certifications are as follows:

-NELAC/Florida Certification number E87582 for analysis of Environmental Water, soil/hazardous waste, and Drinking Water Microbiology, effective 07/01/08-06/30/09. -AIHA Certification ID #100671 for Industrial Hygiene samples (Organics, Inorganics), Environmental Lead (Paint, Soil, Dust Wipes, Air), and Environmental Microbiology (Fungal) effective until 08/01/09.

These results relate only to the items tested. This report may only be reproduced in full and contains 5 total pages (including cover letter).

If you have any questions regarding these test results, please feel free to call.

Sincerely,

Von-Responsive

Project Manager

3785 Presidential Parkway • Atlanta, Georgia 30340 • Tel: (770) 457-8177 • FAX: (770) 457-8188

TEL.: (770) 457-8177 / TOLL-FREE (800) 972-4889 / FAX: (770) 457-8188	72-4889 / FAX: (770)	457-8188						Date: R	Plistog Pape 1	ج. م
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Released by National Guard Bureau Page 174 of 378

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	Analytical Environmental Services, Inc. Sample/Cooler Receipt Checklist					
	client Region South/Georgia	Army	Work Or	der Number 0808A23		
	Checklist completed b Non-Responsive	,				
	Carrier name: FedEx UPS Courier Client Us	S Mail Oth	er	<u></u>		
	Shipping container/cooler in good condition?	Yes L	No	Not Present		
	Custody seals intact on shipping container/cooler?	Yes	No	Not Present		
	Custody seals intact on sample bottles?	Yes	No	Not Present		
	Container/Temp Blank temperature in compliance? (4°CE2)*	Yes	No			
	Cooler #14mbion Cooler #2 Cooler #3	_ Cooler #4	C	00]er#5 Cooler #6		
	Chain of custody present?	Yes				
•	Chain of custody signed when relinquished and received?	Yes	No			
1	Chain of custody agrees with sample labels?	Yes	No			
	Samples in proper container/bottle?	Yes L	No			
	Sample containers intact?	Yes	No			
	Sufficient sample volume for indicated test?	Yes	No			
	All samples received within holding time?	Yes	No			
	Was TAT marked on the COC?	Yes	No			
	Proceed with Standard TAT as per project history?	Yes	No	Not Applicable		
	Water - VOA vials have zero headspace? No VOA vials sul	bmitted i	Yes	No		
	Water - pH acceptable upon receipt?	Yes _	No	Not Applicable		
	Adjusted?	Che	cked by			
	Sample Condition: Good Other(Explain)					
	Sample Condition: Good Other(Explain) (For diffusive samples or AIHA lead) Is a known blank include	ed? Yes		No 🖌		
	See Case Narrative for resolution of the Non-Conformance.					

* Samples do not have to comply with the given range for certain parameters.

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AQuality Assurance/Checklists Procedures Sign-Off Templates/Checklists/Sample Receipt Checklists/Sample_Cooler_Receipt_Checklist

FOIA Requested Record #J-15-0085 (GA) Released by National Guard Bureau Page 176 of 378

Analytical Environmental Services, Inc.

Date: 8/22/2008

LEAD ON WIPES (N9100/7082) N7082

CLIENT:	National Guard Bureau Region-South IH	Lab Order:	0808A23			
Project:	Lagrange Armory	Date Received:	8/15/2008 2:05 PM			
Delivery Order	n	Matrix:	Wipe			
PO No:						

Laboratory ID	Client Sample D	Results	Units	Report Limit.	DF	Date Collected	Date Analyzed	Analysi
0808A23-001A	LA-01	BRL	µg∕ft²	20	1	8/15/2008	8/21/2008	ЛY
0808A23-002A	LA-02	BRL	μg/ft²	20	1	8/15/2008	8/21/2008	Л
0808A23-003A	LA-03	BRL	µg∕ft²	20	ł	8/15/2008	8/21/2008	JY
0808A23-004A	LA-04	BRL	μg/ft²	20	1	8/15/2008	8/21/2008	лү
0808A23-005A	LA-05	BRL	µg/ft²	20	1	8/15/2008	8/21/2008	JY
0808A23-006A	LA-06	BRL	μg/ft²	20	1	8/15/2008	8/21/2008	л
0808A23-007A	LA-07	BRL	µg∕ft²	20	1	8/15/2008	8/21/2008	Л
0808A23-008A	LA-08	BRL	μg/ft²	20	1	8/15/2008	8/21/2008	л
0808A23-009A	LA-09	BRL	μg/ft²	20	I.	8/15/2008	8/21/2008	JY
0808A23-010A	LA-10	BRL	μg/ft²	20	1	8/15/2008	8/21/2008	JY
0808A23-011A	LA-11	BRL	μg/ft²	20	t	8/15/2008	8/21/2008	۲۲ ۲۲
0808A23-012A	LA-12	BRL	µg/ft²	20	1	8/15/2008	8/21/2008	JY.
0808A23-013A	LA-13	BRL	μg/ft²	20	1	8/15/2008	8/21/2008	JY JY
0808A23-014A	LA-14	BRL	µg∕ft²	20	I	8/15/2008	8/21/2008	JY JY
0808A23-015A	LA-15	BRL	μg, Total	20	ł	8/15/2008	8/21/2008	JY

Qualifiers: BRL - Not Detected at the Reporting Limit

DF - Dilution Factor

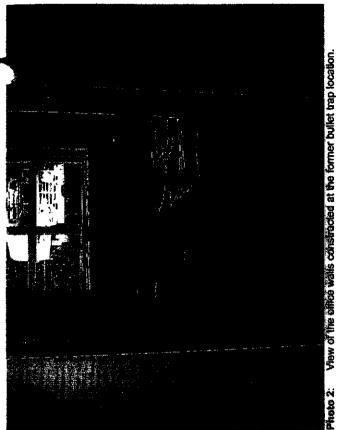
Results are blank corrected where applicable

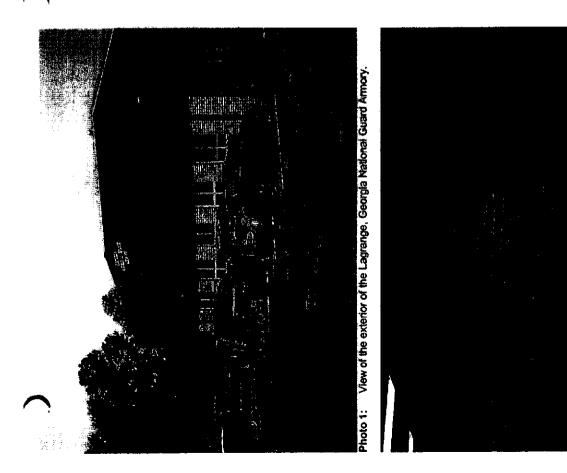
Page 1 of 1

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Date Photos Taken: 15 August 2008

Proto : Vew of left walt with painted surface inside the former iFR.





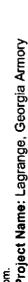


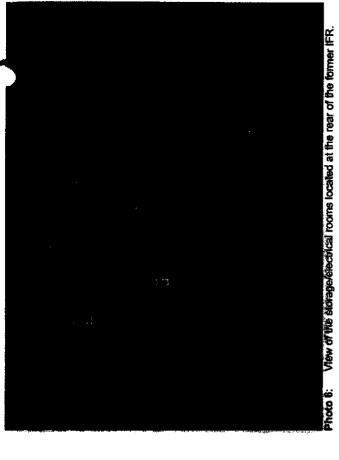
Project Name: Lagrange, Georgia Armory

FOIA Requested Record #J-15-0085 (GA) Released by National Guard Bureau Page 178 of 378

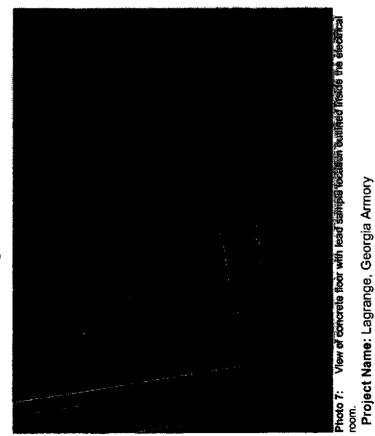
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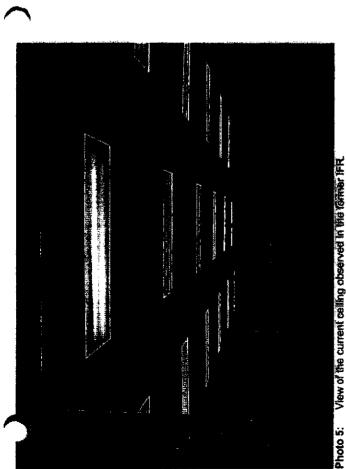
Date Photos Taken: 15 August 2008





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NATIONAL GUARD REGION SOUTH INDUSTRIAL HYGIENE OFFICE 510 PLAZA DRIVE, SUITE 1530 COLLEGE PARK, GA 30349

NGB-AVN-SI

December 10, 2003

MEMORANDUM FOR THE: Georgia Army National Guard, ATTN: ATTN: Mrs. Non-Responsive Occupational Health Manager, P.O. BOX 17965, Atlanta, GA 31316-0965.

SUBJECT: Industrial Hygiene Lead sampling for the Georgia Army National Guard at Metter Armory Indoor Firing Range (IFR).

1. References.

a. Fax sent 1 December 2003.

b. OSHA Standards 29 CFR (Code of Federal Regulations), General Industry, revised 1996 rev.

c. AR 40-5, Preventive Medicine, 15 October 1990.

d. AR 11-34, 15 February 1990, The Army Respiratory Protection Program.

e. AR 385-10, 23 May 1988, Army Safety Program.

f. Department of the Army Pamphlet (DA PAM) 40-501, 27 August 1991, Hearing Conservation.

g. TB MED 503, The Army Industrial Hygiene Program.

h. Title 29 Code of Federal regulation (CFR), 1989 rev, Part 1910.94 (c) (6) Table G-10, Ventilation.

i. Industrial Ventilation, 22nd, 1995, American Conference of Governmental Industrial Hygienist, Cincinnati, Ohio.

j. Title 29 Code of Federal regulation (CFR), Part 1910.1025 Lead

2. General.

a. At the request of Ms. Non-Responsive of the Georgia Safety and Occupational Health Office, Industrial Hygiene Lead sampling was conducted at Metter Armory. The concern was items stored in an Indoor Firing Range that may be contaminated with lead.

b. SGT Non-Responsive of the Southeast Regional Industrial Hygiene office conducted the survey and sampling.

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3. Findings.

Lab Results Multiple By 9 Metter Armory

Sample#	Location	Results
1.	Top left Wall	225
2.	Middle Left Wall	447300
3.	Bottom left Wall	83520
4.	Top left Bullet stop end	851400
5.	Middle Bullet stop end	107100
6.	Bottom Right bullet stop end	702000
7.	Top Right Wall	BRL
8.	Middle Right Wall	594000
9.	Bottom Right Wall	702000
10.	Bottom Rear Wall	531
11.	Blank	BRL
12.	Top Rear wall	549
13.	Floor Right Bullet Stop	37890
14.	Floor Center	5211
15.	Floor Left Rear Wall	13590
16.	Floor	423900
17.	Right Side Wall	342
18.	Middle Right Side Wall	333
19.	Middle rear Wall	243
20.	Blank	BRL
21.	Right wall	432
22.	Shelf Left Wall	BRL
23.	TV By Door	BRL
24.	Individual Control Unit	2925
25.	None	BRL
26.	Copy Machine	3924
27.	Front Door	BRL
28.	Caswall Control	558
29.	Middle Right Wall	783
30.	Black Locker	BRL
31.	Desk	BRL
32.	Perm/Temp Broad	BRL
33.	Blank	BRL

All sample results were measured as micrograms/square foot

All samples collected were either above the 200 micrograms/square foot standard, which require decontamination prior to removal, or below record able levels (BRL)

4. Discussion.

a. The Indoor Firing Range was used as a storage place for office equipment.

b. All of the items inside the range that touched a wall or floor appeared to be contaminated with lead.

5. Recommendations.

- a. Do not remove anything from the Indoor Firing Range before all stored items are cleaned and decontaminated.
- b. Follow the latest guidelines of NG PAM (AR) 385-16, "Guidelines for converting Indoor Firing Ranges to other uses" and NG PAM 385-15, "Policy, Responsibilities and Guidelines for Housekeeping, Rehabilitation and/or Conversion of Indoor firing Ranges" to help in cleaning the items stored in the Indoor Firing Range.
- c. Contact this office if additional samples are needed to be collected either prior to or after decontaminating and removal of stored items.

6. If additional information is needed about the contractors report, please contact Non-Responsive Regional Industrial Hygienist, ARNG-IHS, 1-800-362-0262 OR COMMERCIAL (404) 559-4174



Regional Industrial Hygienist

2 Attachments

CF: State Safety Office, GA, ATTN: LTC. Non-Responsive Safety and Occupational Health Manager, P.O. BOX 17965, Atlanta, GA 31316-0965.

Georgia Army National Guard, Facility Management Office, ATTN: Ms. Non-Responsive CFMO, P.O. BOX 17965, Atlanta, GA 31316-0965.

Swainsboro Armory, ATTN: SGT 673 Kite Rd. Swainsboro, GA 30401

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FOIA Requested Record #J-15-0085 (GA) Released by National Guard Bureau Page 182 of 378

HEADQUARTERS DEPARTMENT OF THE ARMY AND AIR FORCE Washington, DC 20310-2500 1 September 2000

NG PAM 385-15 ANGPAM 91-101

POLICY, RESPONSIBILITIES AND GUIDELINES FOR HOUSEKEEPING, REHABILITATION AND/OR CONVERSION OF INDOOR FIRING RANGES.

Summary. This is a new pamphlet. This guidance prescribes, policy, responsibilities, and procedures on housekeeping, rehabilitation, and/or conversion of indoor firing ranges for other uses.

Applicability. This guidance applies to all persons responsible for the operation of Army National Guard (ARNG) and Air National Guard (ANG) indoor firing ranges. As no regulation/guidance can foresee all situations that might arise. The following is written in a broad scope and is intended to be interpreted as to the INTENT of the law by safety and health professionals.

Supplementation. Supplementation of this guidance is prohibited without prior approval from Chief, National Guard Bureau (NGB-AVN-SI)

Impact on Manning System. This guidance does not contain information that effects the Manning System.

CONTENTS (Listed by paragraph numbers)

	Para
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References	2
Explanation of abbreviations and terms	/ 3
Background	4
Worker Education	5
Personal Protective Equipment	6
Policy and Procedures (Housekeeping)	7
Policy and Procedures (Rehabilitation)	8
Policy and Procedures (Conversion)	9
Medical Surveillance Requirements	10
Wipe Sample Media/Protocol	11
Point of Contact	12

1. Purpose

This Pamphlet establishes policy and procedures for housekeeping, rehabilitation and conversion of indoor firing ranges for other uses. Interim changes. Interim changes are not official unless they are authenticated by the Chief, Administrative Services. Users will destroy Interim changes on their expiration date unless sooner superseded or rescinded.

Suggested Improvements. The proponent of this publication is the National Guard Bureau Users are invited to send comments and suggested improvements on DA Form 2028 (Recommended Changes to Publications and Blank Forms) directly to Chief, National Guard Bureau, Attn: NGB-AVN-SI, 111 South George Mason Drive, Arlington, VA 22204-1382

Distribution. Distribution of this publication is made in accordance with the requirements on DA Form 12-09-E.

2. References

Related publications are listed below.

a. Title 29 Code of Federal Regulations (CFR) Part 1910

b. DHEW NIOSH 76-130 (Lead Exposure and Design Considerations for indoor ranges)

c. OSHA instruction CPL 2-2.20B

d. DODI 6055.1 (Department of Defense Occupational Safety and Health Program)

e. AR 11-34 (The Army Respiratory Protection Program)

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f. AR 40-5 (Preventive Medicine)

g. NGR 385-15 (Policy and Responsibilities for inspection/evaluation and use of National Guard Indoor Firing Ranges).

3. Explanation of abbreviations and terms Abbreviations and special terms used in this publication are listed in the glossary.

4. Background.

29 CFR 1910.1025, Appendix A, identifies lead as a highly toxic metal. Elemental lead is indestructible, and common in the environment. Lead can enter the body by inhalation and ingestion. In addition, lead is a cumulative poison. It accumulates in the blood, bones, and organs, including the kidneys, brain and liver. Effects include nervous and reproductive system disorders, delays in neurological and physical development, cognitive and behavioral changes, and hypertension. Symptoms include loss of appetite, difficulty sleeping, irritability, fatigue, headache, and inability to concentrate. It can stay in the bones for decades. Worker awareness and training are important so that employees can recognize the symptoms of exposure and get prompt medical attention.

5. Worker Education.

29 CFR 1910.1025, Appendix B, requires an information and training program for all employees exposed to lead above the action level or who may suffer skin or eye irritation from lead. This program must inform these employees of the specific hazards associated with their work environment, protective measures which can be taken, the danger of lead to their bodies (including their reproductive systems), and their rights under the standard. In addition you must make readily available to all employees, including those exposed below the action level, a copy of this standard and its appendices. This training program will be repeated annually for personnel in range cleanup operations.

6. Personal Protective Equipment.

29 CFR 1910.1025 (f) (2), Respiratory Protection: For housekeeping and rehabilitation the employer shall select respirators from among those approved for protection against lead dust, fume, and mist by The Mine Safety and Health Administration, and the National Institute for Occupational Safety and Health (NIOSH), under the provision of 30 CFR.

(a) The employer shall institute a respiratory protection program in accordance with 29 CFR 1910.134 (b), (d), (e) and (f).

(b) Per 29 CFR 1910.1025 (g), Protective work clothing and equipment. For employees engaged in range rehabilitation and/or range conversion, the employer shall provide at no cost to the employee, and assure that the employee uses appropriate protective work clothing and equipment such as, but not limited to:

(1) Coveralls or similar full-body work clothing.

(2) Gloves, hats, and shoes or disposable shoe coverlets; and

(3) Appropriate respiratory protection.

(c) The employer shall provide the clothing required in a clean and dry condition at least weekly, and daily to employees engaged in the conversion of indoor firing ranges.

(d) The employer shall provide for the cleaning, laundering, or disposal of protective clothing and equipment.

(e) The employer shall assure that all protective clothing is removed at the completion of a work shift only in areas provided for that purpose.

(f) The employer will insure that contaminated protective clothing which is to be cleaned, laundered, or disposed of, is placed in a closed container in the change area which prevents dispersion of lead outside the container.

(g) The employer will further inform in writing any person who cleans or launders protective clothing or equipment of the potentially harmful effects of exposure to lead.

(h) The employer will ensure that the containers of contaminated protective clothing and equipment are labeled as follows: CAUTION: CLOTHING CONTAMINATED WITH LEAD. DO NOT REMOVE DUST BY BLOWING OR SHAKING. DISPOSE OF LEAD CONTAMINATED WASH WATER IN ACCORDANCE WITH APPLICABLE LOCAL, STATE, OR FEDERAL REGULATIONS.

(i) The employer will prohibit the removal of lead from protective clothing or equipment by blowing, shaking, or any other means which disperses lead into the air.

7. Housekeeping.

This chapter applies to all active indoor ranges classified as safe for "use". To keep the range operating properly and to keep possible hazards to a minimum, a routine housekeeping/ maintenance program is essential.

(a) Housekeeping. The employer must establish a housekeeping program sufficient to maintain all surfaces as free as practicable of accumulations of lead dust. To this end the range will be clean at the conclusion of each firing day.

(1) The range ventilation system will be in operation during all cleaning operations, to ensure a negative pressure environment is maintained.

(2) Cleaning of the range will be accomplished by vacuuming or wet method. A HEPA filtered vacuum system is the preferred method of meeting this requirement. The use of compressed air to clean floors is absolutely prohibited. If the wet method is utilized the floor should be equipped with a floor drain, with a collection system, if not, water needs to be collected and allowed to slowly evaporate leaving lead deposits/sludge that may be collected, placed in metal drums, and stored for future delivery to an authorized hazardous material/waste disposal site. Drums must be labeled to identify contents, in coordination with the hazardous waste program. 1 September 2000

(3) A NIOSH approved respirator for protection against lead dust, fume, and mist will be worn at all times while cleaning.

(4) When cleaning start behind the firing line forward, cleaning the floor and horizontal surfaces.

(b) Maintenance. Following are the minimum maintenance requirements, which must be performed quarterly by the range custodian, or by a person designated by the facility commander.

(1) Inspect the ventilation system fan for condition of belts to ensure that they are not frayed or slipping.

(2) Evaluate static pressure and compare to the baseline static pressure reading. Any changes will be reported through the safety manager to the Regional Industrial Hygienist.

(3) Inspect Louvers, if applicable, to ensure they are opening fully.

(4) Inspect the bullet trap for pitting or other damage and for sharp edges on venetian blind type bullet traps.

(c) Bullet Trap. The bullet trap will cleaned at a minimum quarterly, or when the trap is three quarters full.

(1) The range ventilation system will be operational during all bullet trap cleaning procedures.

(2) All personnel involved in cleaning of the bullet trap will wear a NIOSH approved respirator, and proper personal protective equipment.

(3) All debris from the bullet trap will be collected, package and turned in, in accordance with guidance from the environmental office.

8. Range Rehabilitation.

This chapter applies to all indoor firing ranges that have been identified as requiring rehabilitation. This chapter further provides guidance for cleaning and/or sampling that might be required prior to the start of rehabilitation.

(a) The portion(s) of the range to under go rehabilitation, must be sampled to determine the level of lead contamination. One wipe sample will be taken per every three (3) square feet of area to be rehabilitated.

(b) All personnel involved in range rehabilitation will wear a NIOSH approved respirator, and proper personal protective equipment.

(c) Prior to start of rehabilitation the environmental office must be contacted for disposition of the lead containing debri to be removed.

9. Conversion of Indoor Ranges.

Before the start of decontaminating, employers need to ensure that procedures to be used comply with all Federal, State, and local regulations. To ensure that all lead contamination is eradicated the following procedure is established.

(a) All ranges targeted for conversion will be inspected and evaluated.

(b) All equipment stored in the range, if applicable, prior to the start of decontamination must be sampled, decontaminated, re-sampled and removed or turned in as lead contaminated material.

(c) All acoustical tiles and/or sound proofing material (if applicable) must be removed and turned in as lead containing material through the environmental office.

(d) The backstop, bullet trap, target retrieval system and firing line stations must be removed and turned in as lead containing material through the environmental office.

(e) Light fixtures and ventilation system grills must be removed and decontaminated.

(f) Ventilation system ducts need to be decontaminated or removed and replaced.

(g) The exhaust fans and/or the complete ventilation air handling unit (if applicable) need to be decontaminated or removed. (h) Cover all openings of any component previously decontaminated prior to start of interior decontamination of the firing range.

(i) Prior to start of washing, the interior of the range should be vacuumed with a HEPA filtered vacuum. The range should be washed using a cleaning solution of hot water and Tri-Sodium Phosphate (one ounce of Tri-Sodium Phosphate to five gallons of hot water). A progression of cleaning from top to bottom, and from back to front should be used. All surface areas of the range must be cleaned. Mix new solutions of TSP frequently. Washing will require dual containers of water; one container for wetting the applicators (mops, rags, sponges, etc), and the other container for rinsing the applicators. Waste water placed into containers can be left to evaporate. PROPELY DISPOSE OF ALL HAZARDOUS WASTE AND DO NOT PLACE ANY LEAD CONTAMIN-ATED WASTE INTO THE SEWER SYSTEM OR ONTO THE GROUND.

Mop heads, sponges and rags will be discarded as hazardous waste following decontamination of the range. After completion of decontamination, and prior to taking clearance samples, the ventilation system must be ran for a minimum of 36 hours. Wipe clearance samples will be taken from ceiling, walls and floors. The range will be considered clean if no clearance sample is greater than 100 ug/sq ft, if samples are above 100 ug/sq ft the range is not considered clean, the range will need to be re-washed until clearance samples are below 100 ug/sq ft.

(j) The regional industrial hygienist will do Quality Assurance Sampling as needed.

(k) After obtaining clearance, the walls of the range will be coated with a sealant which is smooth, wood floors will receive a coat of deck enamel or urethane, concrete floors will be sealed with deck enamel. After sealing, floors will be tiled or covered with linoleum.

(1) As a variety of conditions exist in ranges, unique situations may arise and specific written guidance from your Regional Industrial Office may be required.

(m) All personnel involved in the decontamination/conversion of indoor ranges as

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a minimum will be provided with the following personal protective equipment.

(1) Full Face air purifying respirator with HEPA cartridges. The requirements outlined in 29 CFR 1910.134, must be met prior to placing workers in respiratory protection.

(2) Individuals will be provided personal protective equipment as required per Paragraph 6, this pamphlet.

ALL PRIOR CONVERTED RANGES NOT CONVERTED UNDER THE ABOVE GUIDANCE MUST BE INSPECTED AND EVALUATED TO DETERMINE LEAD CONTAMINATION.

10. Medical Surveillance Requirements.

All medical surveillance required by the standard must be performed by or under the supervision of a licensed physician. Medical surveillance is triggered by the results of the air monitoring program. Medical surveillance must be made available to all employees who are exposed in excess of the action level for more than 30 days a year.

Air Monitoring. Worker-breathing-zone air sampling must be collected to ensure personnel are not overexposed to airborne lead during the cleanup phase. Daily air samples will be collected on all personnel involved in the cleanup operation. These exposure levels will be used to evaluate work practices and medical surveillance requirements.

11. Wipe Sample Media/Protocol.

A template measuring 10 centimeters by 10 centimeters square, approximately 4 inches square, should be used to accurately measure and mark the area before collecting wipe samples.

Samples should be staggered to different areas of the range. A grid system should be utilized. Samples should not be collected all on one section of a wall, or end of the building. OSHA instruction CPL 2-2.20B, provides the necessary guidance on the technique needed to collect wipe samples.

12. Point of Contact.

Deviations from this guidance will require a written exception to policy from your Regional Industrial Hygiene Office. Questions and/or comments regarding this subject should be directed to your Regional Industrial Hygiene Office or Chief, National Guard Bureau, ATTN: NGB-AVN-SI, 111 South George Mason Drive, Arlington, VA 22204-1382

Glossary:

Section I. Abbreviations

CFR Code of Federal Regulations

- **HEPA** High Efficiency Particulate Filter
- OSHA Occupational Safety and Health Administration
- DHEW Department of Health, Education and Welfare

Section II: Terms

Clearance Sample: A wipe sample taken after decontamination, with no sample greater then 100 Micrograms per square foot.

Action Level: Employee exposure, without regard to the use of respirators, to an airborne concentration of lead of 30 micrograms per cubic meter of air (30 ug/m3) averaged over an 8-hour period.



NATIONAL GUARD REGION SOUTH INDUSTRIAL HYGIENE OFFICE 510 PLAZA DRIVE, SUITE 1530 COLLEGE PARK, GA 30349

NGB-ARMET-SEIH

August 19, 2008

MEMORANDUM THRU LT. Deputy State Surgeon, Georgia Army National Guard, Medical Command, 5019 Highway 42, Ellenwood, GA 30294.

TO: Mr. Non-Responsive, Georgia Army National Guard, CFMO-Environmental Officer, Post Office Box 437, Hinesville, GA 31315-5066.

SUBJECT: Metter National Guard Armory, Lead Sampling Survey, Metter, Georgia.

1. References.

- a. Department of Defense Instruction 6055.1, Department of Defense Occupational Safety and Health (OSH) Program, 26 October 1984.
- b. Army Regulation (AR) 40-5, Medical Service, Preventive Medicine, 22 July 2005.
- c. National Guard Regulation (NGR) 385-10, Army National Guard Safety and Occupational Health Program, 1988.
- d. AR 385-10, The Army Safety Program, 29 February 2000.
- e. NGR Pam 420-15, Guidelines and Procedures for Rehabilitation and Conversion of Indoor Firing Ranges, 3 November 2006.
- f. NGR 385-15, Policy and Responsibilities, Evaluation and Operation of Army National Guard Indoor Firing Ranges, 3 November 2006.
- g. DA PAM 40-503, The Army Industrial Hygiene Program, 30 October 2000.
- h. Industrial Ventilation, 23rd Edition, American Conference of Governmental Industrial Hygienist, Cincinnati, Ohio.
- i. Title 29, Code of Federal Regulations (CFR), 2001 rev., part 1910, Occupational Safety and Health Standards.

2. General.

a. As requested by, Georgia Occupational Health Office, personnel with the National Guard Region South Office performed a visual inspection at the referenced site. The apparent objective of the inspection was to collect surface

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FOIA Requested Record #J-15-0085 (GA) Released by National Guard Bureau Page 188 of 378 SUBJECT: Lead Sampling Survey, Metter Armory, Metter, Georgia.

wipe samples from the former Indoor Firing Range for analysis of total lead to confirm/deny the presence of lead dust at concentrations above regulatory standards.

b. Sergeant (SGT) Non-Responsive with the National Guard Region South Industrial Hygiene Office in College Park Georgia performed the site visit.

3. Findings.

General Information

On July 16, 2008, a site visit was conducted and at the time of the sampling activity, the interior of the Metter Armory Indoor Firing Range was filled with chairs, desks, tables and was currently used by the Chaplain for conducting religious services for soldiers. At the time of the site visit, five firing lanes were observed along with the bullet trap and metal sound deflectors attached to the ceiling of the former IFR. Additionally, there was metal caging present at the rear of the former indoor firing range, prohibiting access to the rear wall of the former IFR. As a result, lead wipe samples were collected from the metal caging for subsequent analysis. General construction was observed as concrete flooring and ceiling with cinder-block walls. It should be noted that the ceiling and walls of the former IFR were covered with sound-proofing materials. The sound proofing materials were removed at selected sample locations and the lead wipe samples were collected from the surface of the concrete and cinder-block walls.

Sampling Activities

Based on the number of surfaces observed, samples were collected in accordance with NG Pam 420-15. Ghost Wipes[™] are pre-moistened media made of non-woven polyvinyl alcohol fiber and approved by American Industrial Hygiene Association (AIHA) for lead sampling. The wipes also meet all American Standards Testing Materials (ASTM) Designation E1792-96E specifications for sampling materials for lead in surface dust.

The surface samples were collected by SGT subsequent using a 1 square foot sampling template placed on the surface area identified for sampling. The area within the template was wiped using a new Ghost WipeTM. After the area inside the template was wiped, the sampling media was placed into a labeled re-sealable plastic bag and sealed. After each sample collection, a new surface area template was used and new disposable gloves were donned. A total of 39 samples were collected including three from each surface area and one sample from the observed office furniture and firing lanes for submittal to Analytical Environmental Services, Inc. (AES) in Atlanta, Georgia for subsequent analysis of total lead. In addition, four wipe samples were placed into a re-sealable bag and submitted as field blank samples for analysis.

Laboratory Results

The laboratory results indicate lead concentrations detected above the IFR post cleaning standard. These sampling results indicate that any previous decontamination activities were not adequate to remove the lead dust from the former range at acceptable levels. In accordance with the National Guard Bureau Pamphlet 420-15, the IFR cannot be converted for other uses until the lead dust levels are reduced to $200\mu g/ft^2$ or lower depending on local requirements.

The results of the lead dust sampling activities are summarized in the following table.

NGB-ARMET-SEIH

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SUBJECT: Lead Sampling Survey, Metter Armory, Metter, Georgia.

Sample Number	Sample Location	Laboratory Results ¹
MET-01	Upper Wall, Bullet Stop	268,000
MET-02	Middle Wall, Bullet Stop	113,000
MET-03	Lower Wall, Bullet Stop	216,000
MET-04	Upper Right Wall	2,820
MET-05	Middle Right Wall	67
MET-06	Lower Right Wall	111
MET-07	Upper Rear Wall	221
MET-08	Middle Rear Wall	153
MET-09	Lower Rear Wall	189
MET-10	Upper Left Wall	BRL
MET-11	Middle Left Wall	BRL
MET-12	Lower Left Wall	23
MET-13	Floor at Bullet Stop	1,840
MET-14	Middle Floor	197
MET-15	Floor at Rear Wall	220
MET-16	Ceiling at Bullet Stop	BRL
MET-17	Middle Ceiling	BRL
MET-18	Ceiling at Rear Wall	BRL
MET-19	Field Blank	BRL
MET-20	Firing Lane 1	58
MET-21	Firing Lane 2	69
MET-22	Firing Lane 3	67
MET-23	Firing Lane 4	86
MET-24	Firing Lane 5	45
MET-25	Field Blank	BRL
MET-26	Wooden Storage Box	26
MET-27	Plastic Storage Box	BRL
MET-28	Chaplains Desk	BRL
MET-29	Table	BRL
MET-30	Vacant Desk	58
MET-31	Field Blank	BRL
MET-32	Blue Chair at IFR Entrance	BRL
MET-33	White Chair 1 st Row of Chairs	139
MET-34	White Chair 2 nd Row of Chairs	BRL
MET-35	Metal Sound Deflector at Bullet Trap	115
MET-36	Metal Sound Deflector	2,290
MET-37	Top of Black Housing at Firing Lane 2	802
MET-38	Field Blank	BRL
MET-39	2-Drawer File	BRL

¹ Results reported in micrograms per square feet (µg/ft²) ² BRL = Below Reportable Limits

The laboratory report including the Chain of Custody records are attached for review.

SUBJECT: Lead Sampling Survey, Metter Armory, Metter, Georgia.

4. Recommendations.

- a. Ensure that the former indoor firing range remains closed and secured to prevent unauthorized entry into this area.
- b. Review NG Bureau Pamphlet 420-15 prior to conducting decontamination of the IFR and conduct cleaning activities in accordance with the regulatory document. Keep in mind that EPA (40 CFR Subpart D) and your state may have lead reduction levels lower than the levels recommended in NG Bureau Pamphlet 420-15.
- c. Prior to initiating decontamination activities and in accordance with 29 CFR 1910.1025, perform and conduct training for employees exposed to lead concentrations above the standard or who may suffer skin or eye irritation from exposure to lead.
- d. Ensure that appropriate personal protective equipment is worn during decontamination activities.
- e. Consult with local Environmental Agency for guidance on proper disposal of materials used in decontaminating the IFR.
- f. Upon completion of the decontamination activities, contact the Regional IH office for evaluation and collection of confirmatory lead dust samples.

5. If additional information is needed about the contractors report, please contact SGT Non-Responsive Regional Industrial Hygiene Technician, 1-800-362-0262 OR COMMERCIAL (404) 559-4174.

Non-Responsive

Regional Industrial Hygienist

CF: Georgia Army National Guard, ATTN: LT Non-Responsive Deputy State Surgeon Office, 5019 Highway 42, Ellenwood, GA 30294.

CF: State Safety Office, GA, ATTN: MAJ. Non-Responsive Safety and Occupational Health Manager, 1388 1st Street, Building 840, Dobbins ARB, GA 30069.

CF: Georgia Department of Defense, ATTN: Mr. Non-Responsive, CFMO-ENV Building 21, 935 E. Confederate Avenue, SE, Atlanta, GA 30316.

CF: Georgia Department of Defense, ATTN: Mr. Non-Responsive Facilities Maintenance Manager, Building 12, 935 E. Confederate Avenue, SE, Atlanta, GA 30316.



ANALYTICAL ENVIRONMENTAL SERVICES, INC.

July 28, 2008

Non-Responsive

National Guard Bureau Region-South IH 510 Plaza Drive, Suite 1530 Suite 1530 College Park, GA 30349

TEL: (404) 559-4174 FAX: (404) 559-4175

RE: Metter Armory

Dear Non-Responsive

Order No.: 0807E51

Analytical Environmental Services, Inc. received 39 samples on 7/21/2008 9:45:00 AM for the analyses presented in the following report.

No problems were encountered during the analyses. Additionally, all results for the associated Quality Control samples were within EPA and/or AES established limits. Any discrepancies associated with the analyses contained herein will be noted and submitted in the form of a project Case Narrative.

AES' certifications are as follows:

-NELAC/Florida Certification number E87582 for analysis of Environmental Water, soil/hazardous waste, and Drinking Water Microbiology, effective 07/01/08-06/30/09. -AIHA Certification ID #100671 for Industrial Hygiene samples (Organics, Inorganics), Environmental Lead (Paint, Soil, Dust Wipes, Air), and Environmental Microbiology (Fungal) effective until 08/01/09.

These results relate only to the items tested. This report may only be reproduced in full and contains $\boxed{7}$ total pages (including cover letter).

If you have any questions regarding these test results, please feel free to call.

Sincerely,



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Analytical Environmental Services, Inc.

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Cooler #1 Amalent Cooler #2 Cooler #3 Co	oler #4 Cooler #5 Cooler #6
Chain of custody present? Yes	No
Chain of custody signed when relinquished and received? Yes	No
Chain of custody agrees with sample labels? Yes	No
Samples in proper container/bottle? Yes	₩ No -
Sample containers intact? Yes	₩ <u>No</u> _
Sufficient sample volume for indicated test? Yes	No _
All samples received within holding time? Yes	↓ No _
Was TAT marked on the COC? Yes	- /
Proceed with Standard TAT as per project history? Ye	S No Not Applicable
Water - VOA vials have zero headspace? No VOA vials submi	
Water - nH acceptable upon receipt? Ye	s No Not Applicable
Adjusted?	Checked by
Sample Condition: Good Other(Explain)	
Adjusted? Sample Condition: Good Other(Explain) (For diffusive samples or AlHA lead) Is a known blank included?	YesNo _
See Case Narrative for resolution of the Non-Conformance.	
 Samples do not have to comply with the given range for certain parameters. 	and the Markenmale Cooler Receipt ('becklist
 Samples do not nave to comply volution ground by \L\Quality Assurance\Checklists Procedures Sign-Off Templates\Check 	ists/Sample Receipt Checklists/Sample_Cooler_Record_clicethan

Analytical Environmental Services, Inc.

Date: 7/28/2008

LEAD ON WIPES (N9100/7082) N7082

CLIENT:	National Guard Bureau Region-South IH	Lab Order:	0807E51
Project:	Metter Armory	Date Received:	7/21/2008 9:45 AM
Delivery Orde	F :	Matrix:	Wipe
PO No:			

Laboratory	Client Sample	Results	Units	Report	DF	Date	Date	Analyst
D	ID			Limit.		Collected	Analyzed	
0807E51-001A	MET-01	268000	μg/ft²	10100	507	7/16/2008	7/28/2008	JY
0807E51-002A	MET-02	113000	µg/ft²	2720	136	7/16/2008	7/28/2008	JY
0807E51-003A	MET-03	216000	μg/ft²	8160	408.25	7/16/2008	7/28/2008	JY
0807E51-004A	MET-04	2820	µg∕ft²	89	4.45	7/16/2008	7/28/2008	JY
0807E51-005A	MET-05	67	μg/ft²	20	1	7/16/2008	7/28/2008	JY
0807E51-006A	MET-06	111	μg/ft²	20	1	7/16/2008	7/28/2008	JY
0807E51-007A	MET-07	221	μg/ft²	20	1	7/16/2008	7/28/2008	Л
0807E51-008A	MET-08	153	μg/ft²	20	1	7/16/2008	7/28/2008	JY
0807E51-009A	MET-09	189	μg/ft²	20	1	7/16/2008	7/28/2008	JY
0807E51-010A	MET-10	BRL	μg/ft²	20	1	7/16/2008	7/28/2008	JY
0807E51-011A	MET-11	BRL	μg/ft²	20	1	7/16/2008	7/28/2008	JY
0807E51-012A	MET-12	23	μg/ft²	20	1	7/16/2008	7/28/2008	JY
0807E51-012A	MET-13	1840	μg/ft²	67	3.33	7/16/2008	7/28/2008	JY
0807E51-013A	MET-14	197	μg/ft²	20	1	7/16/2008	7/28/2008	ЛY
0807E51-014A	MET-15	220	μg/ft²	20	1	7/16/2008	7/28/2008	Л
0807E51-015A	MET-16	BRL	μg/ft²	20	ı	7/16/2008	7/28/2008	JY
0807E51-017A	MET-17	BRL	μg/ft²	20	1	7/16/2008	7/28/2008	JY
	MET-18	BRL	μg/ft²	20	1	7/16/2008	7/28/2008	ΥĽ
0807E51-018A	MET-19	BRL	ug, Total	20	1	7/16/2008	7/28/2008	JY
0807E51-019A	MET-20	58	μg/ft²	20	1	7/16/2008	7/28/2008	JY
0807E51-020A	MET-21	69	μg/ft²	20	1	7/16/2008	7/28/2008	JY
0807E51-021A	MET-21 MET-22	67	μg/ft²	20	1	7/16/2008	7/28/2008	JY
0807E51-022A	MET-22 MET-23	86	μg/ft²	20	1	7/16/2008	7/28/2008	JY
0807E51-023A	MET-23 MET-24	45	μg/ft²	20	1	7/16/2008	7/28/2008	Л
0807E51-024A		BRL	ug, Total	20	1	7/16/2008	7/28/2008	JY
0807E51-025A	MET-25	26	μg/ft²	20	1	7/16/2008	7/28/2008	JY
0807E51-026A	MET-26	BRL	μg/ft²	20	1	7/16/2008	7/28/2008	JY
0807E51-027A	MET-27		μg/ft²	20	1	7/16/2008	7/28/2008	JY
0807E51-028A	MET-28	BRL	μg/ft²	20	1	7/16/2008	7/28/2008	JY
0807E51-029A	MET-29	BRL	μg/π² μg/ft²	20	1	7/16/2008	7/28/2008	Л
0807E51-030A	MET-30	58 DDI	ug, Total		1	7/16/2008	7/28/2008	JΥ
0807E51-031A	MET-31	BRL.	ug, rotai	±0	•			·

FOIA Requested Record #J-15-0085 (GA) Released by National Guard Bureau Page 197 of 378

nalytical Environmental Services, Inc.

Date: 7/28/2008

LEAD ON WIPES (N9100/7082) N7082

CLIENT:	National Guard Bureau Region-South IH	Lab Order:	0807E51
		Date Received:	7/21/2008 9:45 AM
Project:	Metter Armory	Matrix:	Wipe
Delivery Ord	er:		*
PO No:			

Laboratory	Client Sample	Results	Units	Report	DF	Date	Date	Analyst
D	D			Limit.		Collected	Analyzed	
0807E51-032A	MET-32	BRL	μg/ft²	20	1	7/16/2008	7/28/2008	JY
-	MET-33	139	μg/ft²	20	1	7/16/2008	7/28/2008	JY
0807E51-033A		BRL	μg/ft²	20	1	7/16/2008	7/28/2008	JY
0807E51-034A	MET-34	-		20	1	7/16/2008	7/28/2008	JY
0807E51-035A	MET-35	115	µg/ft²		I		7/28/2008	ΥL
0807E51-036A	MET-36	2290	μg/ft²	78	3.89	7/16/2008	//28/2000	
0807E51-037A	MET-37	802	μg/ft²	20	L	7/16/2008	7/28/2008	JY
000, 200		-		20	1	7/16/2008	7/28/2008	JY
0807E51-038A	MET-38	BRL	ug, Total	20	1		7/28/2008	JY
0807E51-039A	MET-39	BRL	μg/ft²	20	1	7/16/2008	//28/2008	1

Qualifiers:

BRL - Not Detected at the Reporting Limit

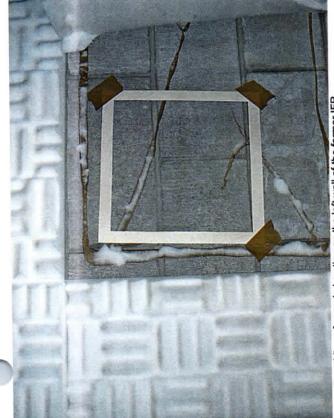
verted at the Reporting Limit DF - Dilution Factor

Date Photos Taken: 16 July 2008

Project Name: Metter Georgia Armory

Photo 7: View of firing lanes observed in the former IFR.

FOIA Requested Record #J-15-0085 (GA) Released by National Guard Bureau Page 199 of 378





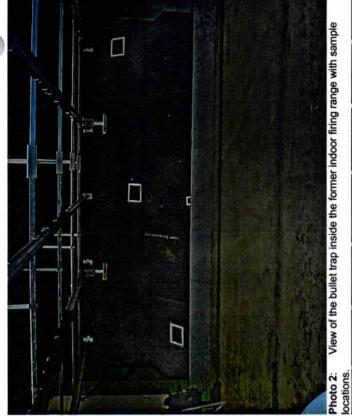






Date Photos Taken: 16 July 2008







Project Name: Metter Georgia Armory

Photo 3:



View of the exterior of the Metter, Georgia National Guard Armory. Photo 1:

FOIA Requested Record #J-15-0085 (GA) Released by National Guard Bureau Page 200 of 378

NATIONAL GUARD REGION SOUTH INDUSTRIAL HYGIENE OFFICE 510 PLAZA DRIVE, SUITE 1530 COLLEGE PARK, GA 30349

NGB-ARS-SEIH

November 18, 2009

MEMORANDUM THRU LT. Deputy State Surgeon, Georgia Army National Guard, Medical Command, 5019 Highway 42, Ellenwood, GA 30294.

TO: Ms. Non-Responsive Georgia Army National Guard, CFMO, 935 Confederate Ave, Bldg 21, Second floor, Atlanta, GA 30316.

SUBJECT: Metter National Guard Armory, Lead Sampling Survey 11 November 2009, Metter, Georgia.

1. References.

- Department of Defense Instruction 6055.1, Department of Defense Occupational Safety and Health (OSH) Program, 26 October 1984.
- b. Army Regulation (AR) 40-5, Medical Service, Preventive Medicine, 22 July 2005.
- c. National Guard Regulation (NGR) 385-10, Army National Guard Safety and Occupational Health Program, 1988.
- d. AR 385-10, The Army Safety Program, 29 February 2000.
- NGR Pam 420-15, Guidelines and Procedures for Rehabilitation and Conversion of Indoor Firing Ranges, 3 November 2006.
- f. NGR 385-15, Policy and Responsibilities, Evaluation and Operation of Army National Guard Indoor Firing Ranges, 3 November 2006.
- g. DA PAM 40-503, The Army Industrial Hygiene Program, 30 October 2000.
- h. Industrial Ventilation, 23rd Edition, American Conference of Governmental Industrial Hygienist, Cincinnati, Ohio.
- i. Title 29, Code of Federal Regulations (CFR), 2001 rev., part 1910, Occupational Safety and Health Standards.

2. General.

- a. As requested by Ms. Non-Responsive CFMO. Clearance sampling was conducted at the referenced site. The objective of the visit was to determine if the Indoor Firing Range was free of lead after clean-up by contractor.
- b. Mr. Non-Responsive Regional Industrial Hygienist with the National Guard Region South Industrial Hygiene Office in College Park Georgia performed the lead sampling.

3. Findings. The laboratory results indicate lead concentrations detected above the IFR post cleaning standard in two locations.

Sample Number	Sample Location	Laboratory Results
MKF-601	Floor left side bullet stop area	BRL
MKF-602	Center bullet stop area	81
MKF-603	Floor right bullet stop area	65
MKF-604	Floor left of bullet stop	245
MKF-605	Floor right of bullet stop	45
MKF-606	Floor 10 feet center bullet stop	31
MKF-607	Floor rear right	21
MKF-608	Floor at IFR exit	991
MKF-609	Lower left wall at bullet stop	21
MKF-610	Middle right wall at bullet stop	BRL
MKF-611	Floor 15 feet center bullet stop	BRL
MKF-612	Blank	BRL
MKF-613	Blank	BRL
MKF-614	Blank	BRL

The results of the lead dust sampling activities are summarized in the following table.

¹ Results reported in micrograms per square feet (µg/ft²)

² BRL = Below Reportable Limits

The laboratory report and a diagram of where samples were taken are attached for review.

4. Recommendations. Reclean the two areas of concern that exceed the standard of 200 micro grams per foot squared.

5. If additional information is needed about the contractors report, please contact **Solution** Regional Industrial Hygienist at 1-800-362-0262 OR COMMERCIAL



Regional Industrial Hygienist

CF: Georgia Army National Guard, ATTN: LTNon-Responsive Deputy State Surgeon Office, 5019 Highway 42, Ellenwood, GA 30294.

CF: State Safety Office, GA, ATTN: MAJ. Non-Responsive Safety and Occupational Health Manager, 1388 1st Street, Building 840, Dobbins ARB, GA 30069.

CF: Georgia Department of Defense, ATTN: Mr. Non-Responsive CFMO-ENV Building 21, 935 E. Confederate Avenue, SE, Atlanta, GA 30316.

CF: Georgia Department of Defense, ATTN: Mr. Non-Responsive Facilities Maintenance Manager, Building 12, 935 E. Confederate Avenue, SE, Atlanta, GA 30316.

Mr.Non-Responsive Georgia Army National Guard, CFMO-Environmental Officer, Post Office Box 437, Hinesville, GA 31315-5066.

Analytical Environmental Services, Inc.

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LEAD ON WIPES (N9100/7082)

					N	7082	
Metter Armory	au Region-So	outh IH			Lab Order: Date Received: Matrix:	0911A59 11/13/2009 Wipe	2:25 PM
Client Sample ID	Results	Units	Report Limit.	DF	Date Collected	Date Analyzed	Analysi
MKF-601	BRL	ug, Total	20	1	11/10/2009	11/16/2009	MAW
MKF-602	81	ug, Total	20	1	11/10/2009	11/16/2009	MAW
MKF-603	65	ug, Total	20	1	11/10/2009	11/16/2009	MAW
MKF-604	245	ug, Total	20	1	11/10/2009	11/16/2009	MAW
MKF-605	45	ug, Total	20	1	11/10/2009	11/16/2009	MAW
MKF-606	31	ug, Total	20	1	11/10/2009	11/16/2009	MAW
MKF-607	21	ug, Total	20	1	11/10/2009	11/16/2009	MAW
MKF-608	991	ug, Total	20	1	11/10/2009	11/16/2009	MAW
MKF-609	21	ug, Total	20	1	11/10/2009	11/16/2009	MAW
MKF-610	BRL	ug, Total	20	1	11/10/2009	11/16/2009	MAW
MKF-611	BRL	ug, Total	20	1	11/10/2009	11/16/2009	MAW
MKF-612	BRL	ug, Total	20	1	11/10/2009	11/16/2009	MAW
MKF-613	BRL	ug, Total	20	1	11/10/2009	11/16/2009	MAW
MKF-6 14	BRL	ug, Total	20	1	11/10/2009	11/16/2009	MAW
	Metter Armory Client Sample ID MKF-601 MKF-602 MKF-603 MKF-604 MKF-604 MKF-605 MKF-606 MKF-607 MKF-608 MKF-609 MKF-610 MKF-611 MKF-612 MKF-613	Metter Armory Results Client Sample Results ID Results MKF-601 BRL MKF-602 81 MKF-603 65 MKF-604 245 MKF-605 45 MKF-606 31 MKF-607 21 MKF-608 991 MKF-609 21 MKF-610 BRL MKF-611 BRL MKF-612 BRL MKF-613 BRL	Client Sample IDResultsUnitsMKF-601BRLug, TotalMKF-60281ug, TotalMKF-60365ug, TotalMKF-604245ug, TotalMKF-60545ug, TotalMKF-60631ug, TotalMKF-60721ug, TotalMKF-608991ug, TotalMKF-610BRLug, TotalMKF-611BRLug, TotalMKF-613BRLug, Total	Metter Armory Results Units Report ID Inits Inits Inits MKF-601 BRL ug, fotal 20 MKF-602 81 ug, fotal 20 MKF-603 65 ug, Total 20 MKF-604 245 ug, Total 20 MKF-605 45 ug, Total 20 MKF-606 31 ug, Total 20 MKF-607 21 ug, Total 20 MKF-608 991 ug, Total 20 MKF-609 21 ug, Total 20 MKF-610 BRL ug, Total 20 MKF-611 BRL ug, Total 20 MKF-613 BRL ug, Total 20	Metter Armory Units Report DF ID Easults Units Report DF JD Easults ug, fotal 200 1 MKF-601 BRL ug, fotal 200 1 MKF-602 81 ug, fotal 200 1 MKF-603 65 ug, Total 200 1 MKF-604 245 ug, Total 200 1 MKF-605 45 ug, Total 200 1 MKF-606 31 ug, Total 200 1 MKF-607 21 ug, Total 200 1 MKF-608 991 ug, Total 200 1 MKF-609 21 ug, Total 200 1 MKF-610 BRL ug, Total 200 1 MKF-611 BRL ug, Total 200 1 MKF-613 BRI ug, Total 200 1	National Guard Bureau Region-South IHLab Order: Date Received: Matrix:Metter ArmoryLab Order: Date Received: Matrix:Date Received: Matrix:Client SampleResultsVinitsReportDFDateIDLimit.DateCollectedMKF-601BRLug, Total20111/10/2009MKF-60281ug, Total20111/10/2009MKF-60365ug, Total20111/10/2009MKF-604245ug, Total20111/10/2009MKF-60545ug, Total20111/10/2009MKF-60631ug, Total20111/10/2009MKF-60721ug, Total20111/10/2009MKF-608991ug, Total20111/10/2009MKF-610BRLug, Total20111/10/2009MKF-611BRLug, Total20111/10/2009MKF-612BRLug, Total20111/10/2009MKF-613BRLug, Total20111/10/2009MKF-613BRLug, Total20111/10/2009	Metter Armory Date Received: 11/13/2009 Metter Armory Date Received: 11/13/2009 Matrix: Wipe Client Sample Results Units Report DF Date Received: 11/13/2009 MKF-601 BRL ug, Total 20 1 11/10/2009 11/16/2009 MKF-602 81 ug, Total 20 1 11/10/2009 11/16/2009 MKF-603 65 ug, Total 20 1 11/10/2009 11/16/2009 MKF-604 245 ug, Total 20 1 11/10/2009 11/16/2009 MKF-605 45 ug, Total 20 1 11/10/2009 11/16/2009 MKF-606 31 ug, Total 20 1 11/10/2009 11/16/2009 MKF-607 21 ug, Total 20 1 11/10/2009 11/16/2009 MKF-608 991 ug, Total 20 1 11/10/2009 11/16/2009 MKF-610 BRL <t< td=""></t<>

Qualifiers:

BRI. - Not Detected at the Reporting Limit

- ----

DF - Dilution Factor

Page 1 of 1 FOIA Requested Record #J-15-0085 (GA) Released by National Guard Bureau Page 204 of 378

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Indoor Firing Range Diagram

Site Location	n etc.	
Survey Date 1	12/09	

			$\overline{\langle}$
	Bullet Stop		
9	+ 245m3/f+2	Ĺ	-10
Left Wall	Floor		Right Wall
\bigcirc			
		7	
\bigcirc	(2) 99(mg/ft2		
\geq			
	\bigtriangleup		
	Rear Wall		

Legend

Sample Key:]-Floor sample ○-Bullet stopfloor)-Leftwall A-Rear Wall -Rightwall NEF-612 413 FOIA Requested Record #J-15-0085 (GA) Released by National Guard Bureau Page 205 of 378



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NATIONAL GUARD REGION SOUTH INDUSTRIAL HYGIENE OFFICE 510 PLAZA DRIVE, SUITE 1530 COLLEGE PARK, GA 30349

NGB-AVN-SEIH

September 9, 2008

MEMORANDUM THRU LT. Monthesponsive Deputy State Surgeon, Georgia Army National Guard, Medical Command, 5019 Highway 42, Ellenwood, GA 30294.

TO: Mr. Non-Responsive Georgia Army National Guard, CFMO-Environmental Officer, Post Office Box 437, Hinesville, GA 31315-5066.

SUBJECT: Montezuma National Guard Armory, Lead Sampling Survey, Montezuma, Georgia.

1. References.

- a. Department of Defense Instruction 6055.1, Department of Defense Occupational Safety and Health (OSH) Program, 26 October 1984.
- b. Army Regulation (AR) 40-5, Medical Service, Preventive Medicine, 22 July 2005.
- c. National Guard Regulation (NGR) 385-10, Army National Guard Safety and Occupational Health Program, 1988.
- d. AR 385-10, The Army Safety Program, 29 February 2000.
- e. NGR Pam 420-15, Guidelines and Procedures for Rehabilitation and Conversion of Indoor Firing Ranges, 3 November 2006.
- f. NGR 385-15, Policy and Responsibilities, Evaluation and Operation of Army National Guard Indoor Firing Ranges, 3 November 2006.
- g. DA PAM 40-503, The Army Industrial Hygiene Program, 30 October 2000.
- h. Threshold Limit Values and Biological Exposure Indices (TLV's) for 2003, American Conference of Governmental Industrial Hygienists (ACGIH), Cincinnati, Ohio.
- i. Industrial Ventilation, 23rd Edition, American Conference of Governmental Industrial Hygienist, Cincinnati, Ohio.
- j. Title 29, Code of Federal Regulations (CFR), 2001 rev., part 1910, Occupational Safety and Health Standards.

SUBJECT: Lead Sampling Survey, Montezuma Armory, Montezuma, Georgia.

2. General.

- a. As requested by, Georgia Occupational Health Office, personnel with the National Guard Region South Office performed a visual inspection at the referenced site. The apparent objective of the inspection was to collect surface wipe samples from the former Indoor Firing Range (IFR) for analysis of total lead to confirm/deny the presence of lead dust at concentrations above regulatory standards.
- b. Sergeant (SGT)Non-Responsive with the National Guard Region South Industrial Hygiene Office in College Park Georgia performed the site visit.

3. Findings.

General Information

On August 15, 2008, a site visit was conducted and at the time of the sampling activity, the interior of the former IFR appeared to have undergone conversion to a training/classroom. The flooring was observed to be covered with vinyl floor tile and there was a drop ceiling present completed with 2 feet by 2 feet acoustical ceiling panels. Painted cinder-block walls were observed and there were offices constructed in the area identified as the former location of the bullet stop. There was however, exposed concrete flooring and original ceiling materials observed inside the electrical room located at the rear of the former IFR. As a result of the renovation activities completed in the former IFR, original surface exposure was limited.

Sampling Activities

Based on the number of surfaces observed, samples were collected in accordance with NG Pam 420-15. Ghost WipesTM which are pre-moistened media made of non-woven polyvinyl alcohol fiber and approved by American Industrial Hygiene Association (AIHA) for lead sampling were used to collect dust samples. The wipes also meet all American Standards Testing Materials (ASTM) Designation E1792-96E specifications for sampling materials for lead in surface dust.

The surface samples were collected by SGT using a 1 square foot sampling template placed on the surface area identified for sampling. The area within the template was wiped using a new Ghost WipeTM. After the area inside the template was wiped, the sampling media was placed into a labeled re-sealable plastic bag and sealed. After each sample collection, a new surface area template was used and new disposable gloves were donned. A total of 16 samples were collected from exposed surface areas. Collected samples were submitted to Analytical Environmental Services, Inc. (AES) in Atlanta, Georgia for subsequent analysis of total lead. In addition, one wipe sample was placed into a re-sealable bag and submitted as field blank samples for analysis.

Laboratory Results

The laboratory results did not indicate the presence of lead concentrations above the IFR post cleaning standard of 200 micrograms per feet squared ($\mu g/ft^2$). These sampling results indicate that any previous decontamination activities appear to be adequate to remove the lead dust from the former range at acceptable levels. It should be noted that the sampling activities were completed in a former IFR which has undergone conversion/renovation.

Sample Number	Sample Location	Laboratory Results ¹
MON-01	Middle Wall at Former Bullet Stop	BRL ²
MON-02	Lower Right Wall	BRL
MON-03	Middle Right Wall	BRL
MON-04	Upper Right Wall	BRL
MON-05	Lower Rear Wall	BRL
MON-06	Middle Rear Wall	BRL
MON-07	Upper Rear Wall	BRL
MON-08	Lower Left Wall	BRL
MON-09	Middle Left Wall	BRL
MON-10	Upper Left Wall	BRL
MON-11	Floor, Rear of Former IFR	BRL
MON-12	Floor, Rear of Former IFR	BRL
MON-13	Floor Outside of Former Bullet Stop	BRL
MON-14	Field Blank	BRL
MON - 15	Tabletop at Former Bullet Stop	BRL
MON-16	Metal Wall Locker Top	BRL

The results of the lead dust sampling activities are summarized in the following table.

¹ Results reported in micrograms per square feet (µg/ft²)

² BRL = Below Reportable Limits

The laboratory report, including the Chain of Custody record is attached for review.

4. Recommendations.

- a. In as much as the former IFR at the Montezuma Armory has been converted to a training room, it appears that lead dust is not present at concentrations above the NGB standard. It should be noted that the sampling activities were limited to exposed areas observed inside the former IFR.
- b. In accordance with NGB Pamphlet 420-15, continue lead testing on an annual basis to verify that lead has not migrated from the substrate. The annual sampling shall include areas of the ceiling, walls and floors. Following the annual sampling event, if lead concentrations are less than 200 μ g/ft², the walls of the former IFR shall be coated with a lead dust encapsulant. Conventional paint can not be used as an encapsulant. It should be noted that the referenced guidance document does not address coating the ceiling. However, it appears that the presence of the drop ceiling with acoustical ceiling panels would be sufficient barrier to prevent potential lead migration and exposure.

SUBJECT: Lead Sampling Survey, Montezuma Armory, Montezuma, Georgia.

5. If additional information is needed about the contractors report, please contact SGT Non-Responsive Regional Industrial Hygiene Technician, 1-800-362-0262 OR COMMERCIAL (404) 559-4174.



Regional Industrial Hygienist

CF: Georgia Army National Guard, ATTN: LTNon-Responsive Deputy State Surgeon Office, 5019 Highway 42, Ellenwood, GA 30294.

CF: State Safety Office, GA, ATTN: MAJ Non-Responsive Safety and Occupational Health Manager, 1388 1st Street, Building 840, Dobbins ARB, GA 30069.

CF: Georgia Department of Defense, ATTN: Mr. Non-Responsive CFMO-ENV Building 21, 935 E. Confederate Avenue, SE, Atlanta, GA 30316.

CF: Georgia Department of Defense, ATTN: Mr. Non-Responsive Facilities Maintenance Manager, Building 12, 935 E. Confederate Avenue, SE, Atlanta, GA 30316.



ANALYTICAL ENVIRONMENTAL SERVICES, INC.

August 22, 2008

Non-Responsive

National Guard Bureau Region-South IH 510 Plaza Drive, Suite 1530 Suite 1530 College Park, GA 30349

TEL: (404) 559-4174 FAX (404) 559-4175

RE: Montezuma Armory

Dear Non-Responsive

Order No.: 0808A31

Analytical Environmental Services, Inc. received 16 samples on 8/15/2008 2:05:00 PM for the analyses presented in the following report.

No problems were encountered during the analyses. Additionally, all results for the associated Quality Control samples were within EPA and/or AES established limits. Any discrepancies associated with the analyses contained herein will be noted and submitted in the form of a project Case Narrative.

AES' certifications are as follows:

-NELAC/Florida Certification number E87582 for analysis of Environmental Water, soil/hazardous waste, and Drinking Water Microbiology, effective 07/01/08-06/30/09. -AIHA Certification ID #100671 for Industrial Hygiene samples (Organics, Inorganics), Environmental Lead (Paint, Soil, Dust Wipes, Air), and Environmental Microbiology (Fungal) effective until 08/01/09.

These results relate only to the items tested. This report may only be reproduced in full and contains <u>5</u> total pages (including cover letter).

If you have any questions regarding these test results, please feel free to call.

Sincerely,



3785 Presidential Parkway • Atlanta, Georgia 30340 • Tel: (770) 457-8177 • FAX: (770) 457-8188

L-THE: (60) 973-3489 (YX) (YX) 953-9189 Date: (L/C/G) Date: (L/C/G) <thdate:< th=""><th>17.1 ARSIN (TUN, 427-3418) Dots: 1.1 (TUN, 427-3418) 17.1 (Model: Mark) (C, Model: M</th><th></th><th></th><th></th><th></th><th>s strio O î</th><th>10 # 0j</th><th>N T</th><th>-</th><th></th><th>-</th><th>-</th><th>-</th><th></th><th></th><th></th><th></th><th></th><th></th><th></th><th>-</th><th>-</th><th></th><th>14</th><th></th><th><u></u></th><th></th><th></th><th></th><th></th><th>2</th><th></th></thdate:<>	17.1 ARSIN (TUN, 427-3418) Dots: 1.1 (TUN, 427-3418) 17.1 (Model: Mark) (C, Model: M					s strio O î	10 # 0j	N T	-		-	-	-								-	-		14		<u></u>					2	
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L-FREE (800) 972-4889 L-FREE (800) 972-4889 FREE 800) 972-4889	The contrast rational transmission of the contrast ration of the contrast ration of the contrast 2 and 2	/ FAX: (770) 457-8188	1/4 24 Drive	ge. Park, GA	1555-4175	on Respons	SAMPLED	UNAR			×			×	×	X	>	7	>	×	>							SHIPMENT METHOD	VIA J J		ALEYHOUND OTHER	S RECEIVED ON THE NEXT 1
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FOIA Requested Record #J-15-0085 (GA) Released by National Guard Bureau Page 211 of 378

White Copy - Original: Yellow Copy - Client

SA Suzy Composition Landon Data	Date: 8/16/08 Page 2 of 2	ANAL YSIS REQUESTED Visit our website	www.acsatlanta.com	atus of hottle	orders, etc.	PRESERVATION (See codes)	NEMARKS	$1, X, I, < \sigma_{m,0/e}$	=							PROJECT INFORMATION RECEIPT	PO14 Noi	(unaround Tane Request	 2 Husiness Day Rush		1 ž	E-mail? Y/N, Face Y/N
	- 75 Presidential Parkway, Atlanta GA 30340-3704 AES TEL.: (770) 457-8177 / TOLL-FREE (800) 972-4889 / FAX: (770) 457-8188 MOANY		college fark, GA 30349	1 /2.24 - 41 75		7 (53po)	Land Camp	X WIDE	1 100							DATE/TIME	-15-08 PROJECT NAME	14:05 PROJECT #				UPS MALL COURTER

FOIA Requested Record #J-15-0085 (GA) Released by National Guard Bureau Page 212 of 378

BEST	AVAIL	ABLE	COPY
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Sample/Co	oler Receipt	Checklist
client <u>region South/GAA</u>	rm	Work Order Number 0808A31
Carrier name: FedEx UPS Courier Client U	JS Mail Oth	er
Shipping container/cooler in good condition?		No Not Present
• • • •		No Not Present
Custody scals intact on sample bottles? Non-Respon	Yes 115108	No Not Present
Container/Temp Blank temperature in compliance?	Yes	No
Cooler #1 Ambien Cooler #2 Cooler #3	Cooler #4	Cooler#5 Cooler #6
Chain of custody present?	Yes	No
Chain of custody signed when relinquished and received?	Yes 🗹	No
Chain of custody agrees with sample labels?	Yes 🗸	No
Samples in proper container/bottle?	Yes 🗸	No
Sample containers intact?	Yes	No
Sufficient sample volume for indicated test?	Yes	No
All samples received within holding time?	Yes 🗸	No
Was TAT marked on the COC?	Yes	No
Proceed with Standard TAT as per project history?	Yes	No Not Applicable
Water - VOA vials have zero headspace? No VOA vials	submitted	Yes No
Water - pH acceptable upon receipt?	Yes	No Not Applicable
Adjusted?	Ch	ecked by
Sample Condition: Good Other(Explain)		
(For diffusive samples or AIHA lead) is a known blank inclu-	uded? Ye	ns No

See Case Narrative for resolution of the Non-Conformance.

Analytical Environmental Services, Inc.

* Samples do not have to comply with the given range for certain parameters

MaQuality Assurance/Checklists Procedures Sign-Off Templates/Checklists/Sample Receipt Checklists/Sample_Cooler_Receipt Checklist

Analytical Environmental Services, Inc.

Date: 8/25/2008

LEAD ON WIPES (N9100/7082) N7082

CLIENT:	National Guard Bureau Region-South IH	Lab Order:	0808A31
Project:	Montezuma Armory	Date Received:	8/15/2008 2:05 PM
Delivery Ord	er:	Matrix:	Wipe

PO No:

Laboratory	Client Sample	Results	Units	Report	DF	Date	Date	Analyst
D	ID			Limit.		Collected	Analyzed	
0808A31-001A	MON-01	BRL	μg/ft²	20	1	8/14/2008	8/21/2008	JY
0808A31-002A	MON-02	BRL	μg/ft²	20	1	8/14/2008	8/21/2008	JY
0808A31-003A	MON-03	BRL	μg/ft²	20	1	8/14/2008	8/21/2008	JY
0808A31-004A	MON-04	BRL	µg/ft²	20	1	8/14/2008	8/21/2008	JY
0808A31-005A	MON-05	BRL	µg/ft²	20	1	8/14/2008	8/21/2008	JY
0808A31-006A	MON-06	BRL	µg/ft²	20	1	8/14/2008	8/21/2008	JY
0808A31-007A	MON-07	BRL	µg∕ft²	20	1	8/14/2008	8/21/2008	JY
0808A31-008A	MON-08	BRL	µg∕ft²	20	1	8/14/2008	8/21/2008	JY
0808A31-009A	MON-09	BRL	μg/ft²	20	1	8/14/2008	8/21/2008	JY
0808A31-010A	MON-10	BRL	μg/ft²	20	1	8/14/2008	8/21/2008	JY
0808A31-011A	MON-11	BRL.	µg/ft²	20	1	8/14/2008	8/21/2008	JY
0808A31-012A	MON-12	BRL	µg/ft²	20	1	8/14/2008	8/21/2008	JY
0808A31-013A	MON-13	BRL	µg/ft²	20	1	8/14/2008	8/21/2008	JΥ
0808A31-014A	MON-14	BRL.	ug, Total	20	1	8/14/2008	8/21/2008	JY
0808A31-015A	MON-15	BRL	μg/ft²	20	1	8/14/2008	8/21/2008	JY
0808A31-016A	MON-16	BRL	µg/ft²	20	1	8/14/2008	8/21/2008	JY

BRL - Not Detected at the Reporting Limit

DF - Dilution Factor

...

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Qualifiers:

Page 1 of 1

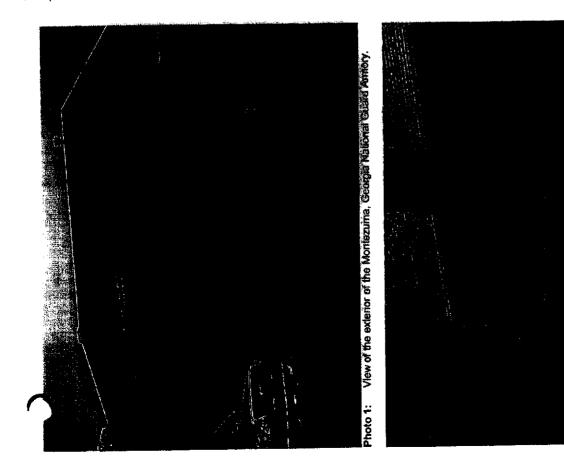
FOIA Requested Record #J-15-0085 (GA) Released by National Guard Bureau Page 214 of 378

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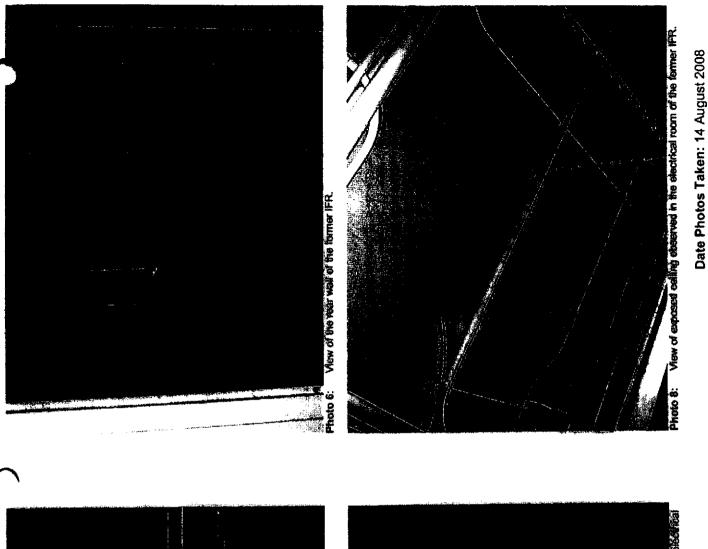
Where A They of the office walls constructed at the former bullet trap location along with the wealt location during the sile visit.

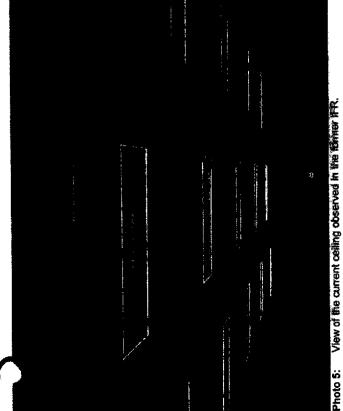


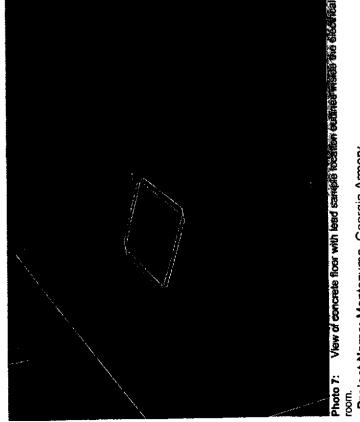


Project Name: Montezuma, Georgia Armory

Photo 3: View of Hight wall with painted surface.







Project Name: Montezuma, Georgia Armory

FOIA Requested Record #J-15-0085 (GA) Released by National Guard Bureau Page 216 of 378

1 (* 1

NATIONAL GUARD REGION SOUTH INDUSTRIAL HYGIENE OFFICE 510 PLAZA DRIVE, SUITE 1530 COLLEGE PARK, GA 30349

NGB-ARMOU-SEIH

July 31, 2008

MEMORANDUM THRU LT Deputy State Surgeon, Georgia Army National Guard, Medical Command, 5019 Highway 42, Ellenwood, GA 30294.

TO: Mr. Non-Responsive Georgia Army National Guard, CFMO-Environmental Officer, Post Office Box 437, Hinesville, GA 31315-5066.

SUBJECT: Moultrie National Guard Armory, Lead Sampling Survey, Moultrie, Georgia.

1. References.

- a. Department of Defense Instruction 6055.1, Department of Defense Occupational Safety and Health (OSH) Program, 26 October 1984.
- b. Army Regulation (AR) 40-5, Medical Service, Preventive Medicine, 22 July 2005.
- c. National Guard Regulation (NGR) 385-10, Army National Guard Safety and Occupational Health Program, 1988.
- d. AR 385-10, The Army Safety Program, 29 February 2000.
- e. NGR Pam 420-15, Guidelines and Procedures for Rehabilitation and Conversion of Indoor Firing Ranges, 3 November 2006.
- f. NGR 385-15, Policy and Responsibilities, Evaluation and Operation of Army National Guard Indoor Firing Ranges, 3 November 2006.
- g. DA PAM 40-503, The Army Industrial Hygiene Program, 30 October 2000.
- h. Threshold Limit Values and Biological Exposure Indices (TLV's) for 2003, American Conference of Governmental Industrial Hygienists (ACGIH), Cincinnati, Ohio.
- i. Industrial Ventilation, 23rd Edition, American Conference of Governmental Industrial Hygienist, Cincinnati, Ohio.
- j. Title 29, Code of Federal Regulations (CFR), 2001 rev., part 1910, Occupational Safety and Health Standards.

BEST AVAILABLE COPY

SUBJECT: Lead Sampling Survey, Moultrie Armory, Moultrie, Georgia.

2. General.

- a. As requested by, Georgia Occupational Health Office, personnel with the National Guard Region South Office performed a visual inspection at the referenced site. The apparent objective of the inspection was to collect surface wipe samples from the former Indoor Firing Range (IFR) for analysis of total lead to confirm/deny the presence of lead dust at concentrations above regulatory standards.
- b. Sergeant (SGT)^{Non-Responsive} with the National Guard Region South Industrial Hygiene Office in College Park Georgia performed the site visit.

3. Findings.

General Information

On July 16, 2008, a site visit was conducted and at the time of the sampling activity, the interior of the former IFR was emptied of the bullet stop and firing line. There were several desk, freezers, and storage units along with a metal safe observed inside the former IFR. It was also noted that the armory was vacant and no longer in use. The surface areas inside the former IFR were observed to be constructed of cinder-block walls with concrete floors and the ceiling was constructed of concrete-type mesh.

Sampling Activities

Based on the number of surfaces observed, samples were collected in accordance with NG Pam 420-15. Ghost Wipes[™] are pre-moistened media made of non-woven polyvinyl alcohol fiber and approved by American Industrial Hygiene Association (AIHA) for lead sampling. The wipes also meet all American Standards Testing Materials (ASTM) Designation E1792-96E specifications for sampling materials for lead in surface dust.

The surface samples were collected by SGT using a 1 square foot sampling template placed on the surface area identified for sampling. The area within the template was wiped using a new Ghost WipeTM. After the area inside the template was wiped, the sampling media was placed into a labeled re-sealable plastic bag and sealed. After each sample collection, a new surface area template was used and new disposable gloves were donned. A total of 32 samples were collected including three from each surface area and one sample from the observed office furniture and appliances for submittal to Analytical Environmental Services, Inc. (AES) in Atlanta, Georgia for subsequent analysis of total lead. In addition, three wipe samples were placed into a re-sealable bag and submitted as field blank samples for analysis.

Laboratory Results

The laboratory results indicate lead concentrations detected above the IFR post cleaning standard. These sampling results indicate that any previous decontamination activities were not adequate to remove the lead dust from the former range at acceptable levels. In accordance with the National Guard Bureau Pamphlet 420-15, the IFR cannot be converted for other uses until the lead dust levels are reduced to $200\mu g/ft^2$ or lower depending on local requirements.

NGB-ARMOU-SEIH

SUBJECT: Lead Sampling Survey, Moultrie Armory, Moultrie, Georgia.

Sample Number	Sample Location	Laboratory Results ¹		
MOU-01	Upper Wall, Bullet Stop	BRL ²		
MOU-02	Middle Wall, Bullet Stop	643		
MOU-03	Lower Wall, Bullet Stop	BRL		
MOU-04	Upper Right Wall	40		
MOU-05	Middle Right Wall	94		
MOU-06	Lower Right Wall	372		
MOU-07	Upper Rear Wall	201		
MOU-08	Middle Rear Wall	2,540		
MOU-09	Lower Rear Wall	533		
MOU-10	Upper Left Wall	BRL		
MOU-11	Middle Left Wall	BRL		
MOU-12	Lower Left Wall	22		
MOU-13	Floor at Bullet	371		
MOU-14	Middle Floor	612		
MOU-15	Floor at Rear Wall	181		
MOU-16	Ceiling at Bullet Stop	BRL		
MOU-17	Middle Ceiling	BRL		
MOU-18	Ceiling at Rear Wall	BRL		
MOU-19	Field Blank	BRL		
MOU-20	Metal Desk w/Wooden Top	105		
MOU-21	Metal Desk, Gray	775		
MOU-22	Metal Desk, Green	125		
MOU-23	Freezer	276		
MOU-24	File Unit, Beige	170		
MOU-25	Freezer, Stainless Steel	340		
MOU-26	Field Blank	399		
MOU-27	Freezer, 2-Door	49		
MOU-28	Wooden Storage Unit	330		
MOU-29	Metal Storage Unit	247		
MOU-30	Metal Safe	353		
MOU-31	Metal Storage Unit at IFR Entrance	50		
MOU-32	Field Blank	84		

The results of the lead dust sampling activities are summarized in the following table.

¹ Results reported in micrograms per square feet (μ g/ft²) ² BRL = Below Reportable Limits

The laboratory report, including the Chain of Custody record is attached for review.

4. Recommendations.

SUBJECT: Lead Sampling Survey, Moultrie Armory, Moultrie, Georgia.

- a. Ensure that the former indoor firing range remains closed and secured to prevent unauthorized entry into this area.
- b. Review NG Bureau Pamphlet 420-15 prior to conducting decontamination of the IFR and conduct cleaning activities in accordance with the regulatory document. Keep in mind that EPA (40 CFR Subpart D) and your state may have lead reduction levels lower than the levels recommended in NG Bureau Pamphlet 420-15.
- c. Prior to initiating decontamination activities and in accordance with 29 CFR 1910.1025, perform and conduct training for employees exposed to lead concentrations above the standard or who may suffer skin or eye irritation from exposure to lead.
- d. Ensure that appropriate personal protective equipment is worn during decontamination activities.
- e. Consult with local Environmental Agency for guidance on proper disposal of materials used in decontaminating the IFR.
- f. Upon completion of the decontamination activities, contact the Regional IH office for evaluation and collection of confirmatory lead dust samples.

5. If additional information is needed about the contractors report, please contact SGT Non-Responsive Regional Industrial Hygiene Technician, 1-800-362-0262 OR COMMERCIAL (404) 559-4174.

Regional Industrial Hygienist

bons

CF: Georgia Army National Guard, ATTN: LT Non-Responsive Deputy State Surgeon Office, 5019 Highway 42, Ellenwood, GA 30294.

CF: State Safety Office, GA, ATTN: MAJ. Non-Responsive Safety and Occupational Health Manager, 1388 1st Street, Building 840, Dobbins ARB, GA 30069.

CF: Georgia Department of Defense, ATTN: Mr. Non-Responsive CFMO-ENV Building 21, 935 E. Confederate Avenue, SE, Atlanta, GA 30316.

CF: Georgia Department of Defense, ATTN: Mr. Non-Responsive Facilities Maintenance Manager, Building 12, 935 E. Confederate Avenue, SE, Atlanta, GA 30316.



View of the exterior of the Moultrie, Georgia National Guard Armory. Photo 1:

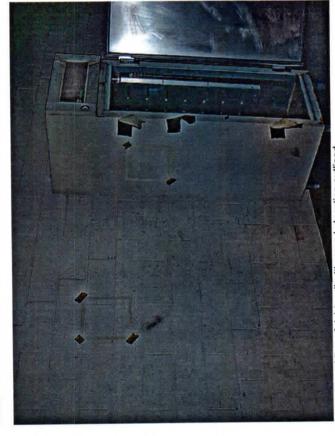


Photo 3: View of right wall with sample location outlined.

Project Name: Moultrie Georgia Armory



View of the wall of the former bullet trap inside the former indoor firing range with sample locations. Photo 2:



Date Photos Taken: 17 July 2008

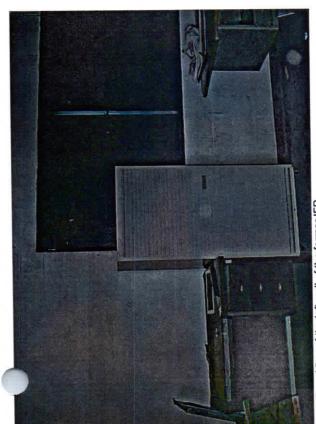


Photo 5: View of the left wall of the former IFR.



Photo 7: View of IFR floor with appliances observed.

FOIA Requested Record #J-15-0085 (GA) Released by National Guard Bureau Page 222 of 378 Project Name: Moultrie Georgia Armory

Date Photos Taken: 17 July 2008

View of concrete floor with lead sample location outlined.

Photo 8:



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A-2

Apendix A

Photos

Georgia National Guard Moultrie Armory.

Apendix B

Sampling

Georgia National Guard Moultrie Armory.

Analytical Environmental Services, Inc.

Date: 7/28/2008

LEAD ON WIPES (N9100/7082)

N7082

		-	/ VO2
CLIENT:	National Guard Bureau Region-South IH	Lab Order:	0807E48
Project:	Moultrie Armory	-	7/21/2008 9:45 AM Wipe
Delivery Ord	er:	Matrix:	wipe

PO No:

Laboratory	Client Sample	Results	Units	Report	DF	Date	Date	Analysi
Laboratory ID	ID	1740 M100		Limit.		Collected	Analyzed	
	MOU-01	BRL	μg/ft²	20	1	7/17/2008	7/28/2008	JY
0807E48-001A	MOU-02	643	μg/ft²	20	1	7/17/2008	7/28/2008	JY
0807E48-002A	MOU-02 MOU-03	BRL	μg/ft²	20	1	7/17/2008	7/28/2008	ΥŢ
0807E48-003A	MOU-03 MOU-04	40	μg/ft²	20	1	7/17/2008	7/28/2008	ΥĽ
0807E48-004A	MOU-04 MOU-05	94	μg/ft²	20	1	7/17/2008	7/28/2008	JY
0807E48-005A	MOU-05 MOU-06	372	μg/ft²	20	l	7/17/2008	7/28/2008	JY
0807E48-006A	MOU-00 MOU-07	201	μg/ft²	20	1	7/17/2008	7/28/2008	JY
0807E48-007A		2540	μg/ft²	72	3.59	7/17/2008	7/28/2008	ΥŢ
0807E48-008A	MOU-08 MOU-09	533	μg/ft²	20	1	7/17/2008	7/28/2008	JY
0807E48-009A		BRL	μg/ft²	20	ı	7/17/2008	7/28/2008	JY
0807E48-010A	MOU-10	BRL	μg/ft²	20	1	7/17/2008	7/28/2008	γι
0807E48-011A	MOU-11	22	μg/ft²	20	1	7/17/2008	7/28/2008	JY
0807E48-012A	MOU-12	371	μg/ft²	20	1	7/17/2008	7/28/2008	ΥŢ
0807E48-013A	MOU-13	612	μg/ft²	20	1	7/17/2008	7/28/2008	JΥ
0807E48-014A	MOU-14	181	μg/ft²	20	1	7/17/2008	7/28/2008	JΥ
0807E48-015A	MOU-15		μg/ft ²	20	1	7/17/2008	7/28/2008	JY
0807E48-016A	MOU-16	BRL	μg/ft²	20	1	7/17/2008	7/28/2008	JY
0807E48-017A	MOU-17	BRL	μg/ft²	20	1	7/17/2008	7/28/2008	JY
0807E48-018A	MOU-18	BRL	ug, Total	20	1	7/17/2008	7/28/2008	JY
0807E48-019A	MOU-19	BRL	ug, rotar μg/ft²	20	- 1	7/17/2008	7/28/2008	ΥŢ
0807E48-020A	MOU-20	105		20	1	7/17/2008	7/28/2008	JY
0807E48-021A	MOU-21	775	μg/ft²	20	1	7/17/2008	7/28/2008	JY
0807E48-022A	MOU-22	125	μg/ft ^a	20	1	7/17/2008	7/28/2008	Υľ
0807E48-023A	MOU-23	276	μg/ft²	20 20	1	7/17/2008	7/28/2008	JY
0807E48-024A	MOU-24	170	µg∕tt²	20 20	1	7/17/2008	7/28/2008	Л
0807E48-025A	MOU-25	340	µg∕ft²		1	7/17/2008	7/28/2008	Л
0807E48-026A	MOU-26	399	ug, Total		•	7/17/2008	7/28/2008	I.
0807E48-027A	MOU-27	49	μg/ft²	20 20	_	7/17/2008	7/28/2008	J
0807E48-028A	MOU-28	330	μg/ft²	20	1	7/17/2008	7/28/2008	ŀ
0807E48-029A	MOU-29	247	μg/ft²	20	1		7/28/2008	1.
0807E48-030A	MOU-30	353	µg∕ft²	20	1	7/17/2008	7/28/2008	1.
0807E48-031A	MOU-31	50	µg∕ft²	20	1	7/17/2008	12012000	

BRL - Not Detected at the Reporting Limit Qualifiers:

Results are blank corrected where applicable

Page 1 of 2

FOIA Requested Record #J-15-0085 (GA) Released by National Guard Bureau Page 225 of 378

halytical Environmental Services, Inc.

ID

MOU-32

D

0807E48-032A

Date: 7/28/2008

LEAD ON WIPES (N9100/7082) N7082

7/28/2008

7/17/2008

ΓY

CLIENT: Project: Delivery Order: PO No:	National Guard Bure Moultrie Armory	au Region-So	uth IH			Lab Order: Date Received: Matrix:	0807E48 7/21/2008 9 Wipe	45 AM
Laboratory	Client Sample	Results	Units	Report Limit.	DF	Date Collected	Date Anałyzed	Analyst

ug, Total

84

20

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Qualifiers:

BRL - Not Detected at the Reporting Limit

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..... DF - Dilution Factor

Page 2 of 2

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FOIA Requested Record #J-15-0085 (GA) Released by National Guard Bureau Page 226 of 378

ANTIONAL CONTRACT

4

NATIONAL GUARD REGION SOUTH INDUSTRIAL HYGIENE OFFICE 510 PLAZA DRIVE, SUITE 1530 COLLEGE PARK, GA 30349

ARNG-CSG-P

April 04, 2011

MEMORANDUM FOR Mr. Non-Responsive Georgia Army National Guard, CFMO-Environmental Officer, Post Office Box 437, Hinesville, GA 31315-5066.

TO: 2 LT Non-Responsive Project Manager, Georgia Army National Guard, CFMO, Bldg 70, 1000 Halsey Ave, Marietta, GA 30062.

SUBJECT: Moultrie National Guard Armory, Lead Sampling Survey 17 March 2011, Moultrie, Georgia.

1. References.

- a. Department of Defense Instruction 6055.1, Department of Defense Occupational Safety and Health (OSH) Program, 26 October 1984.
- b. Army Regulation (AR) 40-5, Medical Service, Preventive Medicine, 22 July 2005.
- c. National Guard Regulation (NGR) 385-10, Army National Guard Safety and Occupational Health Program, 1988.
- d. AR 385-10, The Army Safety Program, 29 February 2000.
- e. NGR Pam 420-15, Guidelines and Procedures for Rehabilitation and Conversion of Indoor Firing Ranges, 3 November 2006.
- f. NGR 385-15, Policy and Responsibilities, Evaluation and Operation of Army National Guard Indoor Firing Ranges, 3 November 2006.
- g. DA PAM 40-503, The Army Industrial Hygiene Program, 30 October 2000.
- h. Industrial Ventilation, 23rd Edition, American Conference of Governmental Industrial Hygienist, Cincinnati, Ohio.
- i. Title 29, Code of Federal Regulations (CFR), 2001 rev., part 1910, Occupational Safety and Health Standards.

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2. General.

ŧ

- a. As requested by Mr. Non-Responsive CFMO-Environmental, clearance sampling was conducted at the referenced site. The objective of the visit was to determine if the Indoor Firing Range (IFR) was free of lead after clean-up by the contractor.
- b. Mr Non-Responsive Regional Industrial Hygienist with the National Guard Region South Industrial Hygiene Office in College Park Georgia performed the lead sampling 4 January 2011.

3. Findings. The laboratory results indicate no lead concentrations above the IFR post cleaning standard of 200 micro grams per square foot. (See attachment)

4. If additional information is needed about the above report, please contact



Regional Industrial Hygienist

Attachment

CF: CF: Georgia Department of Defense, ATTN: COL^{NOI-Responsive}CFMO-Chief, Building 70, 1000 Halsey Ave, Marietta, GA 30062.

CF: Georgia Department of Defense, ATTN: Mr. Non-Responsive Facilities Maintenance Manager, Building 12, 935 E. Confederate Avenue, SE, Atlanta, GA 30316.

Released by National Guard Bureau Page 229 of 378

Page 2 of 7

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Released by National Guard Bureau Page 230 of 378

Analytical Environmental Services, Inc

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Lab Order:	1103J92
Client:	National Guard Bureau Region-South IH
Project:	Moultrie Indoor Firing Range
Matrix:	Wipe
Date Received:	3/22/2011 12:30:00 PM

LEAD ON WIPES (N9100/7082)

N7082

Laboratory ID	Client Sample ID	Result	Units	Reporting Limit	DF	Qual	Date Collected	Date Analyzed	Analyst
1103J92-001A	MKF-1	BRL	ug, Total	20	1		03/17/2011	03/24/2011	MP
1103J92-002A	MKF-2	BRL	ug, Total	20	1		03/17/2011	03/24/2011	MP
1103J92-003A	MKF-3	37	ug, Total	20	1		03/17/2011	03/24/2011	MP
1103J92-004A	MKF-4	BRL.	ug, Total	20	1		03/17/2011	03/24/2011	MP
1103J92-005A	MKF-5	BRL	ug, Total	20	1		03/17/2011	03/24/2011	MP
1103J92-006A	MKF-6	BRL	ug, Total	20	1		03/17/2011	03/24/2011	MP
1103J92-007A	MKF-7	43	ug, Total	20	1		03/17/2011	03/24/2011	MP
1103J92-008A	MKF-8	20	ug, Total	20	1		03/17/2011	03/24/2011	MP
1103J92-009A	MKF-9	BRL	ug, Total	20	1		03/17/2011	03/24/2011	MP
1103J92-010A	MKF-10	109	ug. Total	20	1		03/17/2011	03/24/2011	MP
1103J92-011A	MKF-11	134	ug, Total	20	1		03/17/2011	03/24/2011	MP
1103J92-012A	MKF-12	BRL	ug, Total	20	1		03/17/2011	03/24/2011	MP
1103J92-012A	MKF-13	BRL	ug, Total	20	1		03/17/2011	03/24/2011	MP
1103J92-013A	MKF-14	BRL	ug, Totai	20	ł		03/17/2011	03/24/2011	MP
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1103J92-015A	MKF-16	BRL	ug, Total	20	ł		03/17/2011	03/24/2011	MP
1103J92-016A	MKF-10 MKF-17	BRL	ug, Total	20	ł		03/17/2011	03/24/2011	I MP
1103J92-017A	MKF-18	BRL	ug, Total	20	1		03/17/2011	03/24/2011	I MP
1103J92-018A		BRL	ug, Total	20	i		03/17/2011	03/24/201	I MP
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Results are blank corrected where applicable

FOIA Requested Record #J-15-0085 (GA) Released by National Guard Bureau Page 231 of 378

NATIONAL GUARD REGION SOUTH INDUSTRIAL HYGIENE OFFICE 510 PLAZA DRIVE, SUITE 1530 COLLEGE PARK, GA 30349

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13 February 2003

MEMORANDUM FOR The Florida Army National Guard, ATTN: SFC Non-Responsive Armory Supervisor, Battery A, 1st BN, 265th ADA, 1301 Mosley Ave, Palatka, FL 32177-5619.

SUBJECT: Industrial Hygiene Survey of the Palatka National Guard Armory, Palatka, FL.

1. References.

a. Report submitted 7 February 2003, Industrial Hygiene Survey, LAE Consulting.

b. OSHA Standards 29 CFR (Code of Federal Regulations), General Industry, revised 1988.

c. AR 40-5, Preventive Medicine, October 1990.

d. AR 11-34, 15 February 1990, The Army Respiratory Protection Program.

e. AR 385-10, 23 May 1988, Army Safety Program.

f. Department of the Army Pamphlet (DA PAM) 40-501, 27 August 1991, Hearing Conservation.

g. TB MED 530, The Army Industrial Hygiene Program.

h. Title 29 Code of Federal regulation (CFR), 1989 rev, Part 1910.94 (c) (6) Table G-10, Ventilation.

i. Industrial Ventilation, 21st ed, 1992, American Conference of Governmental Industrial Hygienist, Cincinnati, Ohio.

j. IES Lighting Handbook, Application Volume, 1981, Illumination Engineering Society of North America.

2. General.

a. At the request of the Florida State Safety and Occupational Health Office and the Region South Industrial Hygiene Office a Service Contract was put together to conduct Health Hazard Information module (HHIM) Field surveys and IH surveys at the Florida National Guard Armories.

b. Ms. Non-Responsive of LAE Consulting conducted the survey.

3. Findings. All HHIM field survey forms and survey findings of the report are enclosed. (See ENCL. 1)

4. Recommendations.

a. Follow all recommendations made in reference 1. a., requesting industrial hygiene (IH) services where needed to complete the recommendations.

b. Use the report to help in correcting all deficiencies noted by the contractor.

c. Understand that the lead levels after cleanup in the deactivated Indoor Firing Range should be as close to zero as possible. Contact your FMO and request followup cleaning of this deactivated Indoor Firing Range as soon as possible. The current lead levels are a potential health hazard and can be a major problem if children are allowed to use this facility.

d. Consider additional Industrial Hygiene services to monitor operations that were not looked at or surveyed during the contract visit, especially if this will help eliminate health hazards and reduce medical surveillance cost.

e. To execute your responsibilities in correcting all deficiencies and meeting all standards coordinate with the Occupational Health Nurse and the Occupational Safety and Health Office for technical guidance.

5. If additional information is needed about the contractors report, please contact Non-Responsive Regional Industrial Hygienist, ARNG-IHS, 1-800-362-0262 OR COMMERCIAL (404) 559-4174.



Regional Industrial Hygienist

CF: Office of the Adjutant General, ATTN: MAJ Non-Responsive Safety Manager. Safety and Occupational Health Office, St. Francis Barracks, 82 Marine Street, St. Augustine, FL 32085-1008

LAE CONSULTING

1218 Scattered Pines Court, Severn, MD, 21144 Tel: (410) 551-2717

7 February 2003

MEMORANDUM FOR: Battery A, 1st BN, 265th ADA, ATTN: SFCNon-Responsive 1301 Mosley Ave, Palatka, FL 32177-5619

SUBJECT: Industrial Hygiene Survey of Palatka National Guard Armory, Palatka, FL

1. References.

- a. Title 29, Code of Federal Regulations (CFR) Part 1910, Occupational Safety and Health Administration (OSHA).
- b. AR 40-5, Preventive Medicine, 15 October 1990.

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- c. AR 385-10, 23 May 1988, Army Safety Program.
- d. TB MED 503, The Army Industrial Hygiene Program.
- e. Title 29 CFR, Part 1910.1200, The Hazard Communication Standard.
- f. National Guard Pamphlet (NG Pam) AR 385-16, Safety, Guidelines for Converting Indoor Firing Ranges to Other Uses.
- g. National Institute for Occupational Safety and Health (NIOSH), (76-130) Technical Information, Lead Exposure and Design Considerations for Indoor Firing Ranges GPO, 1975.
- h. IES Lighting Handbook, Application Volume 1981, Illumination Engineering Society of North America.
- i. Occupational Safety and Health Administration (OSHA), 29 CFR, 1926.1101, Asbestos

SUBJECT: Industrial Hygiene Survey of Palatka National Guard Armory, Palatka, FL

2. <u>Purpose.</u> The purpose of this survey was to conduct a baseline Industrial Hygiene survey of the Palatka National Guard Armory. The facility was visually examined and the Building Custodian was interviewed for historical information related to the building and the operations performed. A diagram of the building can be found in Enclosure 1. Laboratory results of Lead wipe samples and Asbestos samples at Enclosure 2. Photographs of the facility can be found in Enclosure 3. Health Hazard Inventories can be found in Enclosure 4. Excerpt of NG Pam 385-16, guidelines for Converting Indoor Firing Ranges to Other Uses in Enclosure 5.

3. <u>Background</u>. At the request of Non-Responsive of the National Guard Bureau Region South Industrial Hygiene Office, Ms. ^{Non-Responsive} of LAE Consulting conducted an industrial hygiene survey at the Palatka National Guard Armory on January 13, 2003.

4. <u>Facility Description</u>. This facility houses the Battery A, 1st BN, 265th ADA. The Armory has two full time personnel. The personnel perform administrative duties Monday through Friday between 0800 and 1630. The Armory is utilized for drills on the weekend. The Armory was built around 1957. The facility houses administrative areas, one kitchen/mess hall, one classroom, a Drill hall, Supply Room, and an Arms Room.

5. Findings.

a. A motor pool is located adjacent to the Armory. Maintenance personnel are assigned to the motor pool during Drill. An eyewash station was found on the floor and not mounted. The eyewash was not in good repair. The motor pool has 2 Bays with exhaust hoses.

b. A deactivated Indoor Firing Range was converted into a storage area. The range is located on the drill Hall Floor. The Drill Hall was the firing line. 2 sliding doors are at that front of the pit. Paper products and chairs are stored in the pit. The backstop and floor have been removed. Seven (7) wipe samples were taken (Table 1). Three samples from the range and four(4) from various other locations throughout the Armory. Two of the seven samples were above the clearance level of 200-mg/ft^2 indicated in reference g (enclosure 3 and 6).

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Page 2

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Table 1.							
Sample Number	Sample Location	Results					
1	Rear brick wall 5 ft	78 ug/ft^2					
2	Pit floor near deflector wall	160ug/ ft ²					
3	pit opening inside wall	3500 ug/ft ²					
4	Drill Hall floor adjacent to supply room	25 ug/ft^2					
5	Middle of Drill hall floor	80 ug/ft ²					
6	Floor beneath bleachers near wall	12 ug/ft^2					
7	Table in kitchen	570 ug/ft^2					
8	Blank	<12 ug					

SUBJECT:	Industrial Hygiene S	Survey of Palatka National (Guard Armory, Palatka, FL
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c. The green floor tile in the kitchen and the beige floor tile in the bathroom was cracked and missing. A bulk sample was analyzed for the presences of Asbestos. Polarized Light Microscopy was used to analyze the samples. Samples were analyzed for the percentage and presence of Asbestos. The sample resulted in No Asbestos Detected.

d. The Drill Hall is used primarily for drills. The floor are hardwood. Visual examination and interview with personnel indicated no apparent vehicle maintenance being performed in this area. A Lead wipe sample was taken in the Drill Hall (Table 1). Results were below the reporting limit.

e. Thee supply room houses an Arms room and An NBC storage area. The areas were visually surveyed and personnel interviewed. Chemical detector alarms with a radioactive source are stored within the Supply room areas. Signage stating "Warning Radioactive Hazard" was posted. Personnel stated that accountability and issuing of weapons is performed in the Arms room. Weapons are not repaired in the arms room. Supply personnel were educated about ensuring that they maintain good personnel hygiene after handling weapons and about the risk of performing weapons repair in a non ventilated area.

f. Illumination levels were measured in the Armories administrative areas. The workstation in the supply room average reading was 26.8-Foot candles (FC). The Platoon SGT's area average reading was 16.3 FC.

g. Petroleum, Oil and Lubricants (POLs) are stored in a building located outside in the motor pool area. A fire extinguisher is located outside the building. No smoking signs are posted. The floor is concrete. The building is cinder block. Two flammable cabinets are located within the building storing paint. Sand bags are used as containment in case of a spill.

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Page 3

FOIA Requested Record #J-15-0085 (GA) Released by National Guard Bureau Page 236 of 378 SUBJECT: Industrial Hygiene Survey of Palatka National Guard Armory, Palatka, FL

6. Recommendations.

a. Recommend cleaning and then mounting the eyewash station in the motor pool. The eyewash should be accessible in case of emergency.

b. Recommend that the Florida Occupational Safety and Health office review the Lead wipe clearance sample results of this facility to determine if the range was adequately decontaminated. If samples are greater than or equal to 200 ug/ft^2 (reference g). Consider discontinuing the use of this area as a storage area until further evaluation can be performed.

c. Any material containing more than one percent Asbestos is considered an Asbestos Containing Material [OSHA 29 CFR, 1910.1101]. All samples analyzed were *negative* for Asbestos.

d. Continue to discourage the use of the Drill Hall as a motor vehicle maintenance bay.

e. Continue to ensure that weapons maintenance is not performed inside the Arms room. Practice good personal hygiene by washing hands thoroughly after handling weapons and ammunition.

f. Lighting in the Administrative areas must be upgrades to meet the required 30-50 FC recommended [IES/ANSI RP1-1993]. Consider purchasing supplemental lighting such as desk lamps until funding for lighting upgrades become available.

g. The POL storage was well organized. No significant findings.

7. <u>Technical Assistance</u>. For technical assistance regarding information found in this report please contact Non-Responsive of the Southeast Regional Industrial Hygiene Office, 1-800-326-0262.

5 Encl

- 1. Building Diagram
- 2. Sample Results
- Photos of Facility
- 4. HHIM
- 5. Excerpts NG Pam 385-16

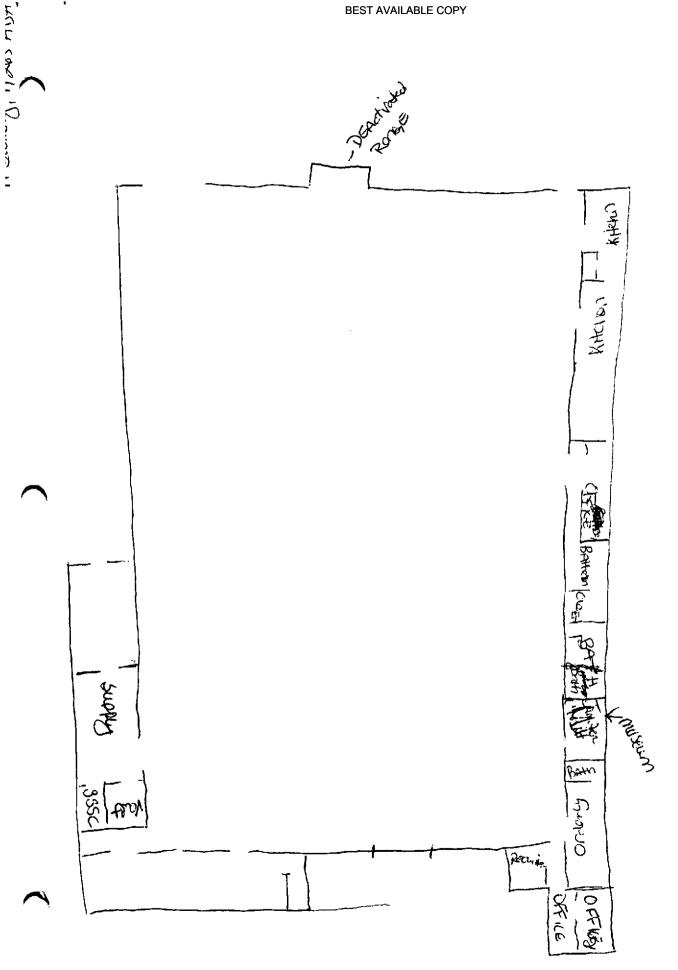
Non-Responsive LAE Consulting

CF: Safety Occupational Health Office, Florida NG

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FOIA Requested Record #J-15-0085 (GA) Released by National Guard Bureau Page 237 of 378



FRONT OF Armory

FOIA Requested Record #J-15-0085 (GA) Released by National Guard Bureau Page 238 of 378

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<u>An AlliA (49263), NVLAP (# 101143), & New York ELAP (#10920) Accredited Laboratory</u> 4475 Forbes Wivd. • Lanham, AD 20706 • (301) 459-2640 • Toll Free (800) 346-0261 • Fax (301) 459-2643

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	AH					Page 1 of 1		Comments				TEM RECOMMENDATION - Please note, due to resolution limitations with optical microscopy and/or interference from matrix components of this sample, results which are reported via PLM as negative or trace (<1%) for asbestos may contain a significant quantity of asbestos. It is recommended that the additional analytical technique of TEM be used to check for asbestos fibers below the resolution limits of optical microscopy.	MATRIX REDUCTION RECOMMENDATION - Please note, due to interference from the matrix components of this sample, results which are reported via PLM as negative or trace (<1%) for asbestos may contain a significant quantity of asbestos which is obscured from view. It is recommended that the additional preparation technique of gravimetric reduction be performed on this sample to minimize the obscuring effects of matrix components, followed by reanalysis by PLM and/or TEM.	
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from us. Sample types, locations and collection protocols are based upon the information provided by the persons submitting them and, unless collected by personnel of these Laboratories, we expressly disclaim any knowledge and liability for the accuracy and completeness of this information. Residual sample material will be discarded in accordance with the appropriate regulatory guidelines, unless otherwise requested by the client. NVLAP Accreditation This report applies only to the sample, or samples, investigated and is not necessarily indicative of the quality or condition of apparently identical or similar products. As a mutual protection to clients, the public and these Laboratories, this report is submitted and accepted for the exclusive use of the client to whom it is addressed and upon the condition that it is not to be used, in whole or in part, in any advertising or publicity matter without prior written authorization that it is not to be used, in whole or in part, in any advertising or publicity matter without prior written authorization applies only to polarized light microscopy of bulk samples and transmission electron microscopy of AHERA air samples. All rights reserved. AMA Analytical Services, Inc.

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40 • Toll Free (800) 346-0964 • Fax (301) 489-2643 ork FLAP (#10920). Accredited Laboratory NAD = "No Asbestos Detected"

TR = "Trace equals less than 1% of this component"

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Front and rear views of Palatka, Florida National Guard Armory





Views of Drill Hall, Palatka NG Armory, Florida



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Downrange views of the Deactivated Indoor Firing Range



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Lead wipe sample under bleachers (yellow card) in Drill Hall



Lead wipe sample location in on top of cabinet in the kitchen



View of sampling location on Drill Hall floor



View of lead wipe sample location in deatvated Indoor firing range

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Location of Chipped floor tile in kitchen

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Interior views of motorpool

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Eyewash located in the motorpool bay



Exterior view of the Motorpool

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Interior and exteior views of the PLL storage building

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NG PAM (AR) 385-16/ ANGPAM 91-101

HEADQUARTERS DEPARTMENTS OF THE ARMY AND THE AIR FORCE Washington, DC 20310-2500 31 January 1994

Safety

GUIDELINES FOR CONVERTING INDOOR FIRING RANGES TO OTHER USES

Summary. This is a new pamphlet. This guidance prescribes policy, responsibilities, and procedures on how to convert lead-contaminated indoor firing ranges to other uses.

Applicability. This guidance applies to all persons responsible for the operation of Army National Guard (ARNG) and Air National Guard (ANG) indoor firing ranges. As no regulation/guidance can foresee all situations that might arise, the following is written in a broad scope and is intended to be interpreted as to the INTENT of the law by health professionals.

Supplementation. Supplementation of this guidance is prohibited without prior approval from Chief, National Guard Bureau (NGB-AVN-SI).

Impact on New Manning System. This guidance does not contain information that affects the New Manning System.

Interim changes. Interim changes are not official unless they are authenticated by the Chief, Administrative Services. Users will destroy interim changes on their expiration date unless sconer superseded or rescinded.

Suggested Improvements. The proponent of this publication is the National Guard Bureau. Users are invited to send comments and suggested improvements on DA Form 2028 (Recommended Changes to Publications and Blank Forms) directly to Chief, National Guard Bureau, Attn: NGB-AVN-SI, 111 South George Mason Drive, Arlington, VA 22204-1382.

Distribution. Distribution of this publication is made in accordance with the requirements on DA Form 12-09-E.

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- A. Sampling Strategy for Collection of Wipe Samples
- B. Interpretation of Sample Results (Prior to Ceaning)
- C. Interpretation of Sample Results (After Cleaning)
- D. OSHA Instruction CPL 2-2.20B
- E. Where to Purchase Sample Media and Containers
- F. AEHA Form 8-R (Bulk Sample Data)
- G. Instructions to Complete AEHA Form 8-R
- H. Examples of Computation of Lead Level from Wipe Sample Results
- L Supporting Laboratories and Areas Served

1. Purpose

Glossary

This pamphlet establishes policy and procedures for converting indoor firing ranges to other uses.

2. References

Related publications are listed below.

a. DODI 6055.1 (Department of Defense Occupational Safety and Health (OSH) Program).

b. AR 11-34 (The Army Respiratory Protection Program).

c. AR 40-5 (Preventive Medicine).

d. NGR (AR) 385-15 (Policy, Responsibilities, and Procedures for Inspection/Evaluation and Use of ARNG Indoor Firing Ranges).

e. TB MED 502 (Occupational and Environmental. Health Repiratory Protection Program).

f. USAEHA TG 141 (Industrial Hygiene Air Sampling and Bulk Sampling Instructions).

g. Title 29, Code of Federal Regulations (CFR) revision, Part 1910 (Occupational Safety and Health Standards).

APPENDIX B INTERPRETATION OF SAMPLE RESULTS (PRIOR TO CLEANING)

B-1 200 micrograms/sq ft or LESS

If all sample results are 200 micrograms/sq ft or less, the range can be converted and/or used for any purpose.

B-2 BETWEEN 201 and 200,000 micrograms/ sq ft.

Range must be decontaminated. Continue with cleaning instructions listed in paragraph 15. Sample results will be used to establish a baseline. The baseline sample results will be used to ensure the 75 percent reduction is achieved.

B-3 OVER 200,000 micrograms/sq ft.

Your sample media may not be capable of collecting additional lead dust and results that are above 200,000 micrograms/sq ft should be considered suspect. Larger concentrations of lead dust may exist on surfaces tested other than results indicate. If the initial sampling results are above 200,000 micrograms/sq ft, the range should be cleaned by either HEPA vacuuming and/or wet wiping to establish a baseline. After the cleaning procedure is completed, resampling should occur until sample results are under the 200,000 micrograms/sq ft limit.

B-4 High sample results may exist due to personnel walking or moving equipment/vehicles over the range surfaces causing the lead dust to be "ground" into the substratum. For example, a maintenance activity may have oversprayed paint or spilled solvents onto the surface which would bond with the lead dust. Consult your Regional Industrial Hygiene Office for specific guidance.

APPENDIX C INTERPRETATION OF SAMPLE RESULTS (AFTER CLEANING)

C-1 200 micrograms/sq ft or LESS

If all sample results are less than 200 micrograms/sq ft, the range can be converted and/or used for any purpose after a coat of lead-free latex paint is applied. The paint color must contrast the color of the present substratum.

C-2 ABOVE 200 micrograms/sq ft

1. 1

As a minimum, a 75 percent reduction should occur from your initial sample results or the samples should be under the 200 microgram/sq ft level. If all sample results meet this criteria, a contrasting color of leadfree latex paint must be applied before the area is utilized for other purposes. The room can only be used as a storage area. Storage of kitchen equipment and food is prohibited. The room cannot be used for a child care or nursery area. If sample results are not below the 75 percent reduction, a more thorough cleaning of the range is required along with resampling until criteria are met.

 PLEASE NOTE, that if your original wipe sample. results were, i.e., 175,000 ug/sq ft then you would have to reduce the lead level below 13,125 ug/sq ft. This would meet the 75 percent reduction criteria; however, this is an enormous amount of lead dust and care should be taken to ensure a heavy coat of paint seals the lead dust. It is unknown at this time whether or not the remaining amount of lead dust will allow the latex. paint to adhered to the substratum. If the paint peels, falls to the floor and is crushed over a period of time, it will create another respirable lead hazard. If this happens, contact your Regional Industrial Hygiene Office for guidance. Periodically monitor the converted range for signs of peeling paint. Paint chips can be analyzed for lead content. DO NOT IGNORE PEELING PAINT IN & CONVERTED INDOOR FIRING RANGE.

> FOIA Requested Record #J-15-0085 (GA) Released by National Guard Bureau Page 253 of 378



NATIONAL GUARD REGION SOUTH INDUSTRIAL HYGIENE OFFICE 510 PLAZA DRIVE, SUITE 1530 COLLEGE PARK, GA 30349

NGB-ARS-SEIH

September 12, 2008

MEMORANDUM THRU LT. Deputy State Surgeon, Georgia Army National Guard, Medical Command, 5019 Highway 42, Ellenwood, GA 30294.

TO: Mr. NOn-Responsive Georgia Army National Guard, CFMO-Environmental Officer, Post Office Box 437, Hinesville, GA 31315-5066.

SUBJECT: Savannah Army National Guard Armory, Lead Sampling Survey, Savannah, Georgia.

1. References.

- a. Department of Defense Instruction 6055.1, Department of Defense Occupational Safety and Health (OSH) Program, 26 October 1984.
- b. Army Regulation (AR) 40-5, Medical Service, Preventive Medicine, 22 August 2005.
- c. National Guard Regulation (NGR) 385-10, Army National Guard Safety and Occupational Health Program, 1988.
- d. AR 385-10, The Army Safety Program, 29 February 2000.
- e. NGR Pam 420-15, Guidelines and Procedures for Rehabilitation and Conversion of Indoor Firing Ranges, 3 November 2006.
- f. NGR 385-15, Policy and Responsibilities, Evaluation and Operation of Army National Guard Indoor Firing Ranges, 3 November 2006.
- g. DA PAM 40-503, The Army Industrial Hygiene Program, 30 October 2000.
- h. Threshold Limit Values and Biological Exposure Indices (TLV's) for 2003, American Conference of Governmental Industrial Hygienists (ACGIH), Cincinnati, Ohio.
- i. Industrial Ventilation, 23rd Edition, American Conference of Governmental Industrial Hygienist, Cincinnati, Ohio.
- j. Title 29, Code of Federal Regulations (CFR), 2001 rev., part 1910, Occupational Safety and Health Standards.

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FOIA Requested Record #J-15-0085 (GA) Released by National Guard Bureau Page 254 of 378 NGB-ARS-SEIH

SUBJECT: Lead Sampling Survey, Savannah Armory, Savannah, Georgia.

2. General.

- a. As requested by, Georgia Occupational Health Office, personnel with the National Guard Region South Office performed a visual inspection at the referenced site. The apparent objective of the inspection was to collect surface wipe samples from the former Indoor Firing Range (IFR) for analysis of total lead to confirm/deny the presence of lead dust at concentrations above regulatory standards.
- b. Sergeant (SGT) Non-Responsive with the National Guard Region South Industrial Hygiene Office in College Park Georgia performed the site visit.

3. Findings.

General Information

On August 28, 2008, a site visit was conducted and at the time of the sampling activity, the bullet stop and firing line were observed inside the firing range. There were several tables, wall lockers and chairs inside the former IFR. The surface areas inside the former IFR were observed to be constructed of painted cinder-block walls, concrete floors and the ceiling was constructed of concrete-type mesh. Portions of the walls were covered with sound-proofing materials.

Sampling Activities

Based on the number of surfaces observed, samples were collected in accordance with NG Pam 420-15. The dust samples were collected using Ghost Wipes[™] which are premoistened media made of non-woven polyvinyl alcohol fiber and approved by American Industrial Hygiene Association (AIHA) for lead sampling. The wipes also meet all American Standards Testing Materials (ASTM) Designation E1792-96E specifications for sampling materials for lead in surface dust.

The surface samples were collected by SGT **Weight** using a 1 square foot sampling template placed on the surface area identified for sampling. The area within the template was wiped using a new Ghost WipeTM. After the area inside the template was wiped, the sampling media was placed into a labeled re-sealable plastic bag and sealed. After each sample collection, a new surface area template was used and new disposable gloves were donned. A total of 22 samples were collected including three from each surface area and one sample from the observed tables for submittal to Analytical Environmental Services, Inc. (AES) in Atlanta, Georgia for subsequent analysis of total lead. In addition, two wipe samples were placed into a re-sealable bag and submitted as field blank samples for analysis.

Laboratory Results

The laboratory results indicate lead concentrations detected above the IFR post cleaning standard. These sampling results indicate that any previous decontamination activities were not adequate to remove the lead dust from the former range at acceptable levels. In accordance with the National Guard Bureau Pamphlet 420-15, the IFR cannot be converted for other uses until the lead dust levels are reduced to $200\mu g/ft^2$ or lower depending on local requirements.

NGB-ARS-SEIH

SUBJECT: Lead Sampling Survey, Savannah Armory, Savannah, Georgia.

Sample Number	Sample Location	Laboratory Results ¹
SA-01	Lower Wall, Bullet Stop	442,000
SA-02	Middle Wall, Bullet Stop	307,000
SA-03	Upper Wall, Bullet Stop	91,400
SA-04	Lower Right Wall	2,580
SA-05	Middle Right Wall	253
SA-06	Upper Right Wall	739
SA-07	Lower Rear Wall	319
SA-08	Middle Rear Wall	138
SA-09	Upper Rear Wall	711
SA-10	Lower Left Wall	244
SA-11	Middle Left Wall	452
SA-12	Upper Left Wall	583
SA-13	Floor at Bullet Stop	116,000
SA-14	Middle Floor	12,800
SA-15	Floor at Rear Wall	4,920
SA-16	Ceiling at Bullet Stop	167,000
SA-17	Middle Ceiling	BRL ²
SA-18	Ceiling at Rear Wall	201
SA-19	Wooden Table, Top	BRL
SA-20	Field Blank	1,830
SA-21	Wooden Table Top, Rear of Range	BRL
SA-22	Field Blank	3,580

The results of the lead dust sampling activities are summarized in the following table.

¹ Results reported in micrograms per square feet (µg/ft²)

² BRL = Below Reportable Limits

The laboratory report, including the Chain of Custody record is attached for review.

4. Recommendations.

- a. Ensure that the former indoor firing range remains closed and secured to prevent unauthorized entry into this area.
- b. Review NG Bureau Pamphlet 420-15 prior to conducting decontamination of the IFR and conduct cleaning activities in accordance with the regulatory document. Keep in mind that EPA (40 CFR Subpart D) and your state may have lead reduction levels lower than the levels recommended in NG Bureau Pamphlet 420-15.
- c. Prior to initiating decontamination activities and in accordance with 29 CFR 1910.1025, perform and conduct training for employees exposed to lead concentrations above the standard or who may suffer skin or eye irritation from exposure to lead.

SUBJECT: Lead Sampling Survey, Savannah Armory, Savannah, Georgia.

- d. Ensure that appropriate personal protective equipment is worn during decontamination activities.
- e. Consult with local Environmental Agency for guidance on proper disposal of materials used in decontaminating the IFR.
- f. Upon completion of the decontamination activities, contact the Regional IH office for evaluation and collection of confirmatory lead dust samples.

5. If additional information is needed about the contractors report, please contact SGT Non-Responsive Regional Industrial Hygiene Technician, 1-800-362-0262 OR COMMERCIAL (404) 559-4174.



Regional Industrial Hygienist

CF: Georgia Army National Guard, ATTN: LTNon-Responsive Deputy State Surgeon Office, 5019 Highway 42, Ellenwood, GA 30294.

CF: State Safety Office, GA, ATTN: MAJ. Non-Responsive Safety and Occupational Health Manager, 1388 1st Street, Building 840, Dobbins ARB, GA 30069.

CF: Georgia Department of Defense, ATTN: Mr Non-Responsive, CFMO-ENV Building 21, 935 E. Confederate Avenue, SE, Atlanta, GA 30316.

CF: Georgia Department of Defense, ATTN: Mr Non-Responsive Facilities Maintenance Manager, Building 12, 935 E. Confederate Avenue, SE, Atlanta, GA 30316.

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ANALYTICAL ENVIRONMENTAL SERVICES, INC.

September 05, 2008

Non-Responsive

National Guard Bureau Region-South IH 510 Plaza Drive, Suite 1530 Suite 1530 College Park, GA 30349

TEL: (404) 559-4174 FAX: (404) 559-4175

RE: Savannah Armory

Dear Non-Responsive

Order No.: 0808K29

Analytical Environmental Services, Inc. received 22 samples on 8/29/2008 3:15:00 PM for the analyses presented in the following report.

No problems were encountered during the analyses. Additionally, all results for the associated Quality Control samples were within EPA and/or AES established limits. Any discrepancies associated with the analyses contained herein will be noted and submitted in the form of a project Case Narrative.

AES' certifications are as follows:

-NELAC/Florida Certification number E87582 for analysis of Environmental Water, soil/hazardous waste, and Drinking Water Microbiology, effective 07/01/08-06/30/09. -AIHA Certification ID #100671 for Industrial Hygiene samples (Organics, Inorganics), Environmental Lead (Paint, Soil, Dust Wipes, Air), and Environmental Microbiology (Fungal) effective until 08/01/09.

These results relate only to the items tested. This report may only be reproduced in full and contains 5 total pages (including cover letter).

If you have any questions regarding these test results, please feel free to call.



Project Manager

3785 Presiden han Parkway • Atlanta, Georgia 30340 • Tel: (770) 457-8177 • FAX: (770)457-8188

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Page 259 of 378

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Analytical Environmental Services, Inc.

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Sample/Cooler Receipt Checklist

	Work Order Number 0808 K29
Client <u>GA Army</u>	Work Order Number 00000121
Non-Responsive 8/30/8	
Checklist completed by Date Date	
Client / US Mail O	ther
Carrier name: FedEx UPS Courier Client US Mail O	
	No Not Present
Shipping container/cooler in good condition:	No Not Present
Custody seals intact on shipping container/cooler? Yes	
Yes	No Not Present
Custody seals intact on sample bottles?	No
Container/Temp Blank temperature in compliance? (4°C12)* Yes	Cooler #6
Cooler #1 Ark Cooler #2 Cooler #3 Cooler #3	#4 Cooler#5 Cooler #6
Cooler #1 <u>Mrz</u> Cooler #2 Cooler #2	No
Chain of custody present?	
Chain of custody signed when relinquished and received? Yes	No
	No
Chain of custody agrees with sample labels	e e e e e e e e e e e e e e e e e e e
Vac	No
Samples in proper container/bottle?	No
Sample containers infact?	
Yes	No
Sufficient sample verante	No
All samples received within horaring the	
Was TAT marked on the COC? Yes	No
Was IAT marked on the other	No Not Applicable
Proceed with Standard TAT as per project history? Yes	Yes No
Water - VOA vials have zero headspace? No VOA vials submitted	st (s = licoble 1
Vac	No Not Applicable
Water - pH acceptable upon receipt?	Checked by
*	
Sample Condition: Good Other(Explain) (For diffusive samples or AIHA lead) Is a known blank included?	Ves No
(For diffusive samples or AIHA lead) Is a known blank included?	
See Case Narrative for resolution of the Non-Conformance.	
See Case this terms and	
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 Samples do not nave to comply with the given tange for certain parameters. MaQuality Assorance:Checklists Procedures Sign-Off Templates/Checklists 	Sample Receipt Checklists/Sample Cooler Receipt Unecking
UAQuality Assurance:Checklists Procedures Sign-Cit Peripart	

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Analytical Environmental Services, Inc.

Date: 9/16/2008

LEAD ON WIPES (N9100/7082) N7082

0808K29 Lab Order: National Guard Bureau Region-South IH 8/29/2008 3:15 PM Date Received: CLIENT: Wipe Savannah Armory Matrix: Project: **Delivery** Order:

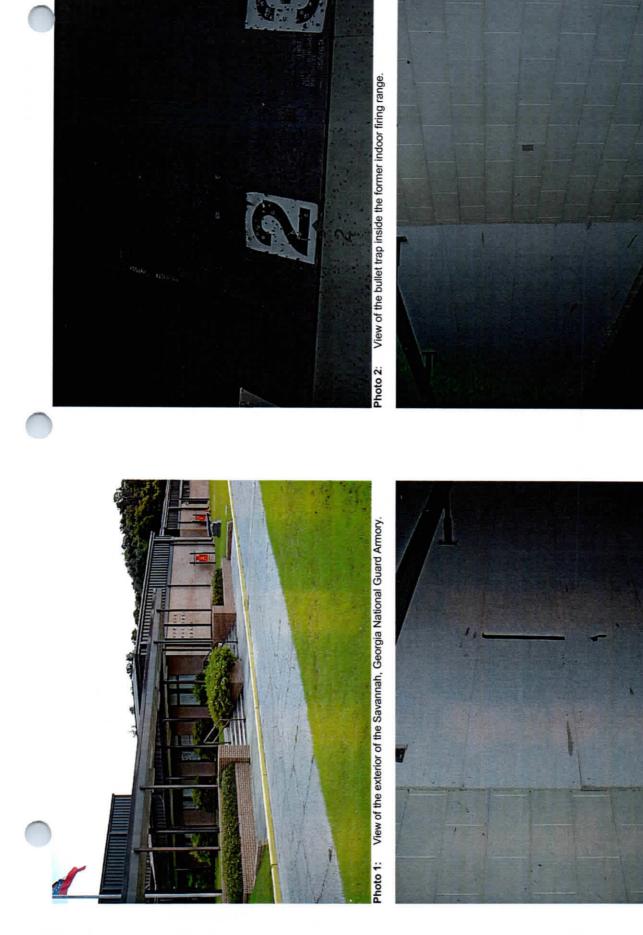
D No:	Client Sample	Results			DF	Date	Date Analyzed	Analyst
Laboratory ID	ID				470	8/28/2008	9/5/2008	TAA
Laboratory ID 0808K29-001A 0808K29-002A 0808K29-003A 0808K29-005A 0808K29-005A 0808K29-006A 0808K29-007A 0808K29-009A 0808K29-010A 0808K29-011A 0808K29-011A 0808K29-013A 0808K29-014A 0808K29-014A	ID SA-01 SA-02 SA-03 SA-04 SA-05 SA-06 SA-07 SA-08 SA-09 SA-10 SA-10 SA-11 SA-12 SA-13 SA-14 SA-15	442000 307000 91400 2580 253 739 319 138 711 244 452 583 116000 12800 4920	μg/ft ² μg/ft ²	Limit. 9400 8420 2000 75 20 20 20 20 20 20 20 20 20 20	470 421 100 3.76 1 1 1 1 1 1 1 1 1 232 17.81 9.42 300	Collected 8/28/2008 8/28/2008 8/28/2008 8/28/2008 8/28/2008 8/28/2008 8/28/2008 8/28/2008 8/28/2008 8/28/2008 8/28/2008 8/28/2008 8/28/2008 8/28/2008 8/28/2008	9/5/2008 9/5/2008 9/5/2008 9/5/2008 9/5/2008 9/5/2008 9/5/2008 9/5/2008 9/5/2008 9/5/2008 9/5/2008 9/5/2008 9/5/2008 9/5/2008 9/5/2008	ТАА ТАА ТАА ТАА ТАА ТАА ТАА ТАА ТАА ТАА
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Qualifiers:

BRL - Not Detected at the Reporting Limit

DF - Dilution Factor

Page 1 of 1



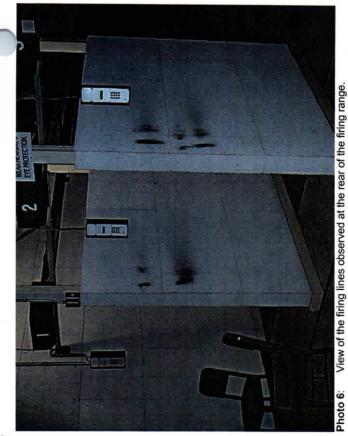
Date Photos Taken: 28 August 2008

Photo 4: View of the painted left wall of the IFR.

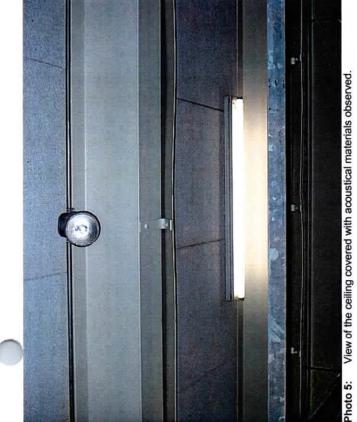
Photo 3: View of the painted right wall of the indoor firing range along with the acoustical materials observed. Project Name: Savannah Georgia Armory

FOIA Requested Record #J-15-0085 (GA) Released by National Guard Bureau Page 263 of 378

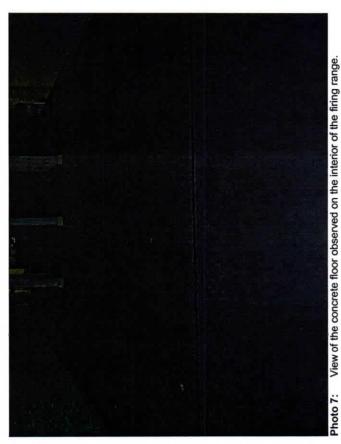




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Project Name: Savannah Georgia Armory

FOIA Requested Record #J-15-0085 (GA) Released by National Guard Bureau Page 264 of 378

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NATIONAL GUARD REGION SOUTH INDUSTRIAL HYGIENE OFFICE 510 PLAZA DRIVE, SUITE 1530 COLLEGE PARK, GA 30349

ARNG-CSG-P

April 29, 2011

MEMORANDUM FOR CPT. Non-Responsive Georgia Army National Guard, 118th Field Artillery, 1248 Eisenhower Drive, Savannah, GA 31406.

TO: Mr. Non-Responsive Project Manager, Georgia Army National Guard, CFMO, Bldg 70, 1000 Halsey Ave, Marietta, GA 30062.

SUBJECT: Savannah National Guard Armory, Lead Sampling follow-up Survey 19 April 2011, Savannah, Georgia.

1. References.

- Department of Defense Instruction 6055.1, Department of Defense Occupational Safety and Health (OSH) Program, 26 October 1984.
- b. Army Regulation (AR) 40-5, Medical Service, Preventive Medicine, 22 July 2005.
- c. National Guard Regulation (NGR) 385-10, Army National Guard Safety and Occupational Health Program, 1988.
- d. AR 385-10, The Army Safety Program, 29 February 2000.
- e. NGR Pam 420-15, Guidelines and Procedures for Rehabilitation and Conversion of Indoor Firing Ranges, 3 November 2006.
- f. NGR 385-15, Policy and Responsibilities, Evaluation and Operation of Army National Guard Indoor Firing Ranges, 3 November 2006.
- g. DA PAM 40-503, The Army Industrial Hygiene Program, 30 October 2000.
- h. Industrial Ventilation, 23rd Edition, American Conference of Governmental Industrial Hygienist, Cincinnati, Ohio.
- Title 29, Code of Federal Regulations (CFR), 2001 rev., part 1910, Occupational Safety and Health Standards.

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2. General.

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- a. As requested by Mr. Non-Responsive CFMO. Clearance sampling was conducted after the contractor returned to once again clean the converted Indoor Firing Range at the referenced site. The objective of the visit was to determine if the Indoor Firing Range (IFR) was free of lead after clean-up by the contractor.
- b. Mr. Non-Responsive Georgia Army National Guard, CFMO-Environmental Officer performed the lead sampling 19 April 2011.

3. Findings. The laboratory results indicate lead concentrations above the IFR post cleaning standard of 200 micro grams per square foot.

Sample Number	Sample Location	Laboratory Results ¹
SAV-01	See attached floor diagram	561
SAV-02	For location of results	1160
SAV-03		36
SAV-04		BRL
SAV-05		38
SAV-06		24
SAV-07		25
SAV-08		BRL
SAV-09		53
SAV-10		BRL
SAV-11		38
SAV-12		49
SAV-13		BRL
SAV-14	м	390
SAV-15		276
SAV-16		134
SAV-17	BLANK	BRL
SAV-18	BLANK	BRL
SAV-19	BLANK	BRL

The results of the lead dust sampling activities are summarized in the following table.

¹ Results reported in micrograms per square feet (µg/ft²)

² BRL = Below Reportable Limits

The laboratory report is attached for review.

4. Discussion. A phone call to Mr. Non-Responsive 28 April 2011 was made to inform him of the sample results. A copy of such results were e-mailed to him 29 April.

5. Recommendations. Once again have the contractor reclean the IFR to get the lead levels below the standard of 200 micro grams per square foot and notify the Regional Industrial Hygiene Office, Mr. Non-Responsive to once again sample the Savannah

Armory as soon as the contractor has finished the cleaning. Do not store anything in the room until the room has been properly cleaned.

6. If additional information is needed about the above report, please contact Regional Industrial Hygienist at (404) 559-4174.



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Regional Industrial Hygienist

CF: State Safety Office, GA, ATTN: LTNon-Responsive Safety and Occupational Health Manager, 1388 1st Street, Building 840, Dobbins ARB, GA 30069.

CF: Georgia Department of Defense, ATTN: COL

CF: Georgia Department of Defense, ATTN: Mr.^{Non-Responsive} Facilities Maintenance Manager, Building 12, 935 E. Confederate Avenue, SE, Atlanta, GA 30316.

Mr. Non-Responsive, Georgia Army National Guard, CFMO-Environmental Officer, Post Office Box 437, Hinesville, GA 31315-5066.

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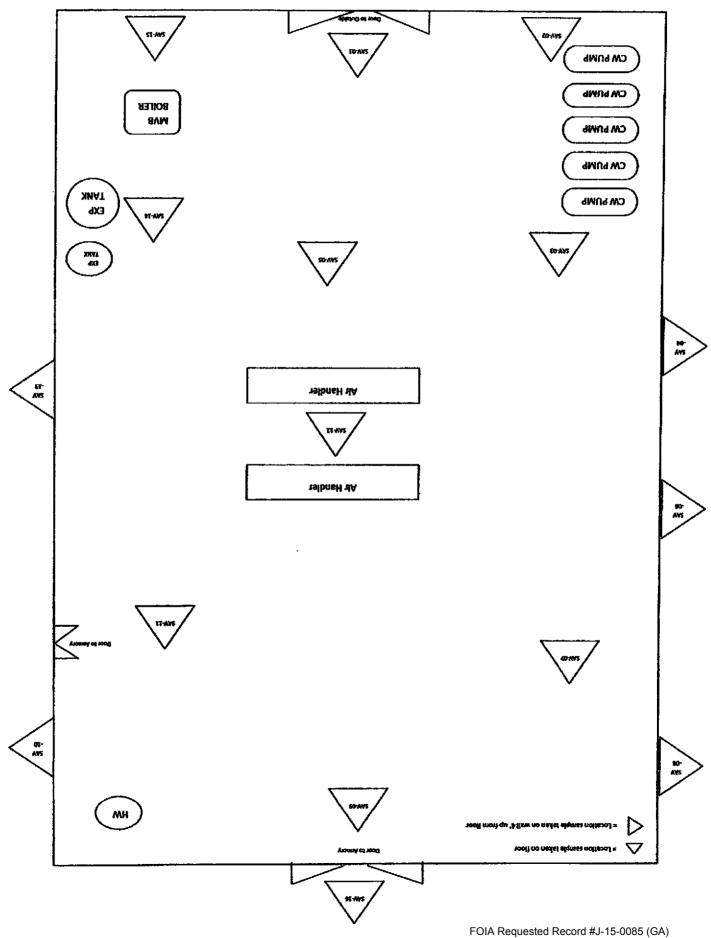
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OIA Requested Record #J-15-0085 (GA) Released by National Guard Bureau Page 270 of 378 .

Analytical Environmental Services, Inc

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Client:	National Guard Bureau Region-South IH
Project:	Savannah Indoor Firing Range
Lab ID:	1104G37

Case Narrative

Two Blank samples collected 4/19/2011 10:25am were listed on the Chain of Custody and were received by the laboratory. All samples were received sorted in the order as they appear on the COC. The Blank samples were logged in based on the order in which they were received.

Analytical Environmental Services, Inc

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Date:	25-Apr-11
DAIC.	23-Api-11

i	Lab Order:	I104G37
1	Client:	National Guard Bureau Region-South IH
	Project: Matrix:	Savannah Indoor Firing Range
		Wipe
	Date Received:	4/20/2011 12:20:00 PM

LEAD ON WIPES (N9100/7082)

N7082

Laboratory ID	Client Sample 1D	Result	Units	Reporting Limit	ĎF	Qual	Date Collected	Date Analyzed	Analyst
1104G37-001A	SAV-01	561	ug, Total	20	1		04/19/2011	04/21/2011	MW
1104G37-002A	SAV-02	1160	ug, Total	45	2.27		04/19/2011	04/21/2011	MW
1104G37-003A	SAV-03	36	ug, Total	20	I		04/19/2011	04/21/2011	MW
1104G37-004A	SAV-04	BRL	ug, Total	20	1		04/19/2011	04/21/2011	MW
1104G37-005A	SAV-05	38	ug, Total	20	ł		04/19/2011	04/21/2011	MW
1104G37-006A	SAV-06	24	ug, Total	20	1		04/19/2011	04/21/2011	MW
1104G37-007A	SAV-07	25	ug, Total	20	1		04/19/2011	04/21/2011	MW
1104G37-008A	SAV-08	BRL	ug, Total	20	1		04/19/2011	04/21/2011	MW
1104G37-009A	SAV-09	53	ug, Total	20	1		04/19/2011	04/21/2011	MW
1104G37-010A	SAV-10	BRL	ug, Total	20	1		04/19/2011	04/21/2011	MW
1104G37-011A	SAV-11	38	ug, Total	20	1		04/19/2011	04/21/2011	MW
1104G37-012A	SAV-12	49	ug, Total	20	1		04/19/2011	04/21/2011	MW
1104G37-013A	SAV-13	BRI.	ug, Total	20	1		04/19/2011	04/21/2011	MW
1104G37-014A	SAV-14	390	ug, Total	20	1		04/19/2011	04/21/2011	MW
1104G37-015A	SAV-15	276	ug, Total	20	1		04/19/2011	04/21/2011	MW
1104G37-016A	SAV-16	134	ug, Total	20	1		04/19/2011	04/25/2011	МР
1104G37-017A	BLANK	BRL	ug, Total	20	1		04/19/2011	04/25/2011	MP
1104G37-018A	BLANK	BRL	ug, Total	20	1		04/19/2011	04/25/2011	MP
1104G37-019A	BLANK	BRL	ug, Total	20	1		04/19/2011	04/25/2011	MP

Analytical Environmental Services, Inc.

Sample/Cooler Receipt Checklist

client GA Army		Work Order Number 1104637
Checklist completed Signature Dat		
Carrier name: FedEx UPS Courier Client U	S Mail Othe	cr
Shipping container/cooler in good condition?	Yes	No Not Present
Custody seals intact on shipping container/cooler?		No Not Present /
Custody seals intact on sample bottles? Container/Temp Blank temperature in compliance? (4°(+2)*	Yes	No Not Present
Container/Temp Blank temperature in compliance? (4*(4+2)*	Yes	No
Cooler #11 Cooler #2 Cooler #3	Cooler #4 _	Cooler#5 Cooler #6
Chain of custody present?	Yes 🖌	No
Chain of custody signed when relinquished and received?	Yes 🗹	No
Chain of custody agrees with sample labels?	Yes	No
Samples in proper container/bottle?	Yes 🗹	No
Sample containers intact?	Yes	No
Sufficient sample volume for indicated test?	Yes	No
All samples received within holding time?	Yes	No
Was TAT marked on the COC?	Yes .	No
Proceed with Standard TAT as per project history?	Yes	No Not Applicable
Water - VOA vials have zero headspace? No VOA vials su	bmitted 🗹	Yes No
Water - pH acceptable upon receipt?	Yes	No Not Applicable
Adjusted?	Chee	cked by
Sample Condition: Good V Other(Explain)		
(For diffusive samples or AIHA lead) is a known blank includ	ed? Yes	No
See Case Narrative for resolution of the Non-Conformance	.	

* Samples do not have to comply with the given range for certain parameters.

V.Quality Assurance/Checklists Procedures Sign-Off Templates/Checklists/Sample Receipt Checklists/Sample_Cooler_Receipt_Checklist

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Services, inc
Environmental \$
Analytical E

Date: 25-Apr-11

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Client: Project: Lab Order:	National Guard Bureau Region-South IH Savannah Indoor Firing Range 1104G37	-South IH				Dates Report	eport	
Lab Sempie ID	Client Sampte ID	Collection Date	۵	Matrix	Test Name	TCLP Date	Prep Date	Analysis Date
1104G37-001A	SAV-01	4/19/2011 10:25:00AM	25:00AM	Wipe	LEAD ON WIPES (N9100/7082)		04/21/2011	04/21/2011
1104G37-002A	SAV-02	4/19/2011 10:25:00AM	25:00AM	Wipe	LEAD ON WIPES (N9100/7082)		04/21/2011	04/21/2011
1104G37-003A	SAV-03	4/19/2011 10:25	25:00AM	Wipe	LEAD ON WIPES (N9100/7082)		04/21/2011	04/21/2011
1104G37-004A	SAV-04	4/19/2011 10:25	25:00AM	Wipe	LEAD ON WIPES (N9100/7082)		04/21/2011	04/21/2011
1104G37-005A	SAV-05	4/19/2011 10:25:00AM	25:00AM	Wipe	LEAD ON WIPES (N9100/7082)		04/21/2011	04/21/2011
1104G37-D06A	SAV-06	4/19/2011 10:25:00AM	25:00AM	Wipe	LEAD ON WIPES (N9100/7082)		04/21/2011	04/21/2011
1104G37-007A	SAV-07	4/18/2011 10:25:00AM	25:00AM	Mpe	LEAD ON WIPES (N9100/7082)		04/21/2011	04/21/2011
1104G37-008A	SAV-08	4/18/2011 10:25:00AM	25:00AM	Wipe	LEAD ON WIPES (N9100/7082)		04/21/2011	04/21/2011
1104G37-009A	SAV-09	4/19/2011 10:25:00AM	25:00AM	Wipe	LEAD ON WIPES (N9100/7082)		04/21/2011	04/21/2011
1104G37-010A	SAV-10	4/19/2011 10:25:00AM	25:00AM	Wipe	LEAD ON WIPES (N9100/7082)		04/21/2011	04/21/2011
1104G37-011A	SAV-11	4/19/2011 10:25:00AM	25:00AM	Wipe	LEAD ON WIPES (N9100/7082)		04/21/2011	04/21/2011
1104G37-012A	SAV-12	4/19/2011 10:25:00AM	25:00AM	Wipe	LEAD ON WIPES (N9100/7082)		04/21/2011	04/21/2011
1104G37-013A	SAV-13	4/19/2011 10:25:00AM	25:00AM	Wipe	LEAD ON WIPES (N9100/7082)		04/21/2011	04/21/2011
1104G37-014A	SAV-14	4/19/2011 11:20:00AM	20:00AM	Wipe	LEAD ON WIPES (N9100/7082)		04/21/2011	04/21/2011
1104G37-015A	SAV-15	4/19/2011 10:25:00AM	25:00AM	Wipe	LEAD ON WIPES (N9100/7082)		04/21/2011	04/21/2011
1104G37-016A	SAV-16	4/19/2011 10:25:00AM	25:00AM	Wipe	LEAD ON WIPES (N9100/7082)		04/22/2011	04/25/2011
1104G37-017A	BLANK	4/19/2011 10:25:00AM	25:00AM	Wipe	LEAD ON WIPES (N9100/7082)		04/22/2011	04/25/2011
1104G37-018A	BLANK	4/19/2011 10:25:00AM	:25:00AM	Wipe	LEAD ON WIPES (N9100/7082)		04/22/2011	04/25/2011
1104G37-019A	BLANK	4/19/2011 11:20:00AM	20:D0AM	Wipe	LEAD ON WIPES (N9100/7082)		04/22/2011	04/25/2011

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NATIONAL GUARD REGION SOUTH INDUSTRIAL HYGIENE OFFICE 510 PLAZA DRIVE, SUITE 1530 COLLEGE PARK, GA 30349

ARNG-CSG-P

July 21, 2011

MEMORANDUM FOR CPT. Non-Responsive Georgia Army National Guard, 118th Field Artillery, 1248 Eisenhower Drive, Savannah, GA 31406.

TO: Mr. Non-Responsive Project Manager, Georgia Army National Guard, CFMO, Bldg 70, 1000 Halsey Ave, Marietta, GA 30062.

SUBJECT: Savannah National Guard Armory, Lead Sampling follow-up Survey 5 May 2011, Savannah, Georgia.

1. References.

- a. Department of Defense Instruction 6055.1, Department of Defense Occupational Safety and Health (OSH) Program, 26 October 1984.
- b. Army Regulation (AR) 40-5, Medical Service, Preventive Medicine, 22 July 2005.
- c. National Guard Regulation (NGR) 385-10, Army National Guard Safety and Occupational Health Program, 1988.
- d. AR 385-10, The Army Safety Program, 29 February 2000.
- e. NGR Pam 420-15, Guidelines and Procedures for Rehabilitation and Conversion of Indoor Firing Ranges, 3 November 2006.
- f. NGR 385-15, Policy and Responsibilities, Evaluation and Operation of Army National Guard Indoor Firing Ranges, 3 November 2006.
- g. DA PAM 40-503, The Army Industrial Hygiene Program, 30 October 2000.
- h. Industrial Ventilation, 23rd Edition, American Conference of Governmental Industrial Hygienist, Cincinnati, Ohio.
- i. Title 29, Code of Federal Regulations (CFR), 2001 rev., part 1910, Occupational Safety and Health Standards.

2. General.

a. After failing the clearance sampling two times before, a third set of clearance sampling was conducted 5 May 2011 after the contractor returned to once again attempt to clean the converted Indoor Firing Range. The results collected 25 January 2011 and 19 April 2011 exceeded the post cleaning standard of 200 micro grams per square foot. The objective of all of the sampling was to ensure lead levels were below 200 micro grams per square foot prior to the areas being encapsulated per NGB PAM 420-15, Guidelines and Procedures for Rehabilitation and Conversion of Indoor Firing Ranges, 3 November 2006.

b. Mr. Non-Responsive Georgia Army National Guard, CFMO-Environmental Officer performed the lead sampling 5 May 2011.

3. Findings. The laboratory results indicate lead concentrations below the IFR post cleaning standard of 200 micro grams per square foot.

Sample Number	Sample Location	Laboratory Results
SAV-01	See attached floor diagram	BRL
SAV-02	For location of results	BRL
SAV-03		51
SAV-04		BRL
SAV-05		BRL
SAV-06		BRL
SAV-07		BRL
SAV-08		BRL
SAV-09		BRL
SAV-10		BRL
SAV-11		BRL
SAV-12	BLANK	BRL
SAV-13	BLANK	BRL
SAV-14	BLANK	BRL

The results of the lead dust sampling activities are summarized in the following table.

¹ Results reported in micrograms per square feet (µg/ft²)

² BRL = Below Reportable Limits

The laboratory report is attached for review.

4. Discussion.

a. According to Mr. Non-Responsive CFMO-Environmental Officer, the reason the results were low is a sealant was applied after this cleanup and the samples were taken on top of the sealant. He toke a picture of 5 gallon cans of the encapsulate sitting in the room. See attached picture 1.

b. The objective of all of the sampling was to ensure lead levels were below 200 micro grams per square foot prior to the areas being encapsulated per NGB PAM 420-15, Guidelines and Procedures for Rehabilitation and Conversion of Indoor Firing Ranges, 3 November 2006. This did not happen.

c. The contractor violated requirements set forth in NG PAM 420-15, Guidelines and Procedures for Rehabilitation and Conversion of Indoor Firing Ranges, 3 November 2006. He did not clean the area below the required level of 200 micro grams per square foot before he used encapsulate on the area.

d. Steven Heng did not follow proper protocol in making sure the IFR was not cleared initially before he let Environmental Engineering start renovation.

5. Recommendations.

a. At this time there are no recommendations to be made due to the fact that the floor of the Indoor Firing range has been removed for further renovation work. See attached pictures 2.

b. Once the floor has been replaced and the area cleaned, request swipe sampling once again be conducted for lead contamination. The swipe test must be conducted after renovation and cleaning and before encapsulate is applied.

c. Until the current renovation is complete and the area properly cleaned, ensure no Guardsmen enter the area under renovation.

6. If additional information is needed about the above report, please contact Non-Responsive Regional Industrial Hygienist at (404) 559-4174.

Non-Responsive

Regional Industrial Hygienist

CF: State Safety Office, GA, ATTN: CPT Non-Responsive Safety and Occupational Health Manager, 1388 1st Street, Building 840, Dobbins ARB, GA 30069.

CF: Georgia Department of Defense, ATTN: COL^{Non-Responsive} CFMO-Chief, Building 70, 1000 Halsey Ave, Marietta, GA 30062.

CF: Georgia Department of Defense, ATTN: MAJ.^{Non-Responsive}State Construction and Facility Manager, Building 70, 1000 Halsey Ave, Marietta, GA 30062.

Mr.Non-Responsive Georgia Army National Guard, CFMO-Environmental Officer, Post Office Box 437, Hinesville, GA 31315-5066.

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ANALYTICAL ENVIRONMENTAL SERVICES, INC.

May 11, 2011

National Guard Bureau Region-South IH 510 Plaza Drive College Park GA 30349

TEL: (404) 559-4174 FAX: (404) 559-4175

RE: Savannah Indoor Firing Range



Order No: 1105711

Analytical Environmental Services, Inc. received 14 samples on 5/9/2011 11:25:00 AM for the analyses presented in following report.

No problems were encountered during the analyses. Additionally, all results for the associated Quality Control samples were within EPA and/or AES established limits. Any discrepancies associated with the analyses contained herein will be noted and submitted in the form of a project Case Narrative.

AES' certifications are as follows:

-NELAC/Florida Certification number E87582 for analysis of Environmental Water, soil/hazardous waste, and Drinking Water Microbiology, effective 07/01/10-06/30/11. -AIHA Certification ID #100671 for Industrial Hygiene samples (Organics, Inorganics), Environmental Lead (Paint, Soil, Dust Wipes, Air), and Environmental Microbiology (Fungal) effective until 09/01/11.

These results relate only to the items tested. This report may only be reproduced in full.

If you have any questions regarding these test results, please feel free to call.



Project Manager

3785 PRESIDENTRY PARKON • AD VILLE OFFICIA 30340 • THE (770) 457 8177 • FAX: (770)457-8188

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TEONAL GUMED BUREAN DUSTRIAL AVATEME OFFICE (4104) 569-4174 Fac			5/5/11 "	_
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(404) 569-4174 Fee	COLLEGE PARK, GA 30349		WWW. Acsatlanta. com	T
Non-Resp	"** (Hoy) 559- 4175		to check on the status of your results, place bottle	
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Released by National Guard Bureau Page 279 of 378

Analytical Environmental Services, Inc

Date: 11-May-11

LEAD ON WIPES (N9100/7082)

N7082

Lab Order:1105711Client:National Guard Bureau Region-South IHProject:Savannah Indoor Firing RangeMatrix:WipeDate Received:5/9/2011 11:25:00 AM

Client Sample 1D	Result	Units	Reporting Limit	DF	Qual	Date Collected	Date Analyzed	Aunlyst
SAV-2-01	BRL	ug, Total	20	1		05/05/2011	05/09/2011	TA
SAV-2-02	BRL	ug, Totai	20	1		05/05/2011	05/09/2011	TA
SAV-2-03	51	ug, Total	20	ł		05/05/2011	05/09/2011	TA
SAV-2-04	BRL	ug, Total	20	I		05/05/2011	05/09/2011	TA
SAV-2-05	BRL	ug, Total	20	I		05/05/2011	05/09/2011	TA
SAV-2-06	BRL	ug, Total	20	1		05/05/2011	05/09/2011	TA
SAV-2-07	BRL	ug, Total	20	ł		05/05/2011	05/09/2011	TA
SAV-2-08	BRL	ug, Total	20	ł		05/05/2011	05/09/2011	TA
SAV-2-09	BRL	ug, Total	20	1		05/05/2011	05/09/2011	TA
SAV-2-10	BRL	ug, Total	20	I		05/05/2011	05/09/2011	TA
SAV-2-11	BRL	ug, Total	20	1		05/05/2011	05/09/2011	TA
SAV-2-BLANK	BRL	ug, Totai	20	1		05/05/2011	05/09/2011	ŤÁ
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Qualifiers BRL - Not Detected at the Reporting Limit

B - Analyte detected in the associated Method Blank

Results are blank corrected where applicable

DF - Dilence Factor

Analytical Environmental Services, Inc.

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Sample/Cooler Receipt Checklist

Client GA Arny		Work Orde	1105711 1105711
Non-Responsive Checklist completed by		9/11	
Signature Da Carrier name: FedEx UPS Courier Client U		er	_
Shipping container/cooler in good condition?	Yes	No	Not Present
Custody seals intact on shipping container/cooler?	Yes Yes	No	Not Present
Custody seals intact on sample bottles? \$751911	Yes	No	Not Present
Container/Temp Bjank temperature in compliance? (19922)	Yes	No	
Cooler #1 aub Cooler #2 Cooler #3	Cooler #4	Coo	er#5 Cooler #6
Chain of custody present?	Yes _ V	No	
Chain of custody signed when relinquished and received?	Yes _ 🗸	No	
Chain of custody agrees with sample labels?	Yes _	No	
Samples in proper container/bottle?	Yes	No	
Sample containers intact?	Yes _	No	
Sufficient sample volume for indicated test?	Yes	No	
All samples received within holding time?	Yes _	No	
Was TAT marked on the COC?	Yes _	No	
Proceed with Standard TAT as per project history?	Yes	No	Not Applicable
Water - VOA vials have zero headspace? No VOA vials su	ibmitted	Yes _	No
Water - pH acceptable upon receipt?	Yes _	No	Not Applicable
Adjusted?	Chee	ked by	<u></u>
Sample Condition: Good Other(Explain)			
(For diffusive samples or AIHA lead) Is a known blank includ	ed? Yes	N	•

See Case Narrative for resolution of the Non-Conformance.

* Samples do not have to comply with the given range for certain parameters

\L\Quality Assurance\Checklists Procedures Sign-Off Templates\Checklists\Sample Receipt Checklists\Sample_Cooler_Receipt_Checklists

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Analytical Environmental Services, Inc

Date: 11-May-11

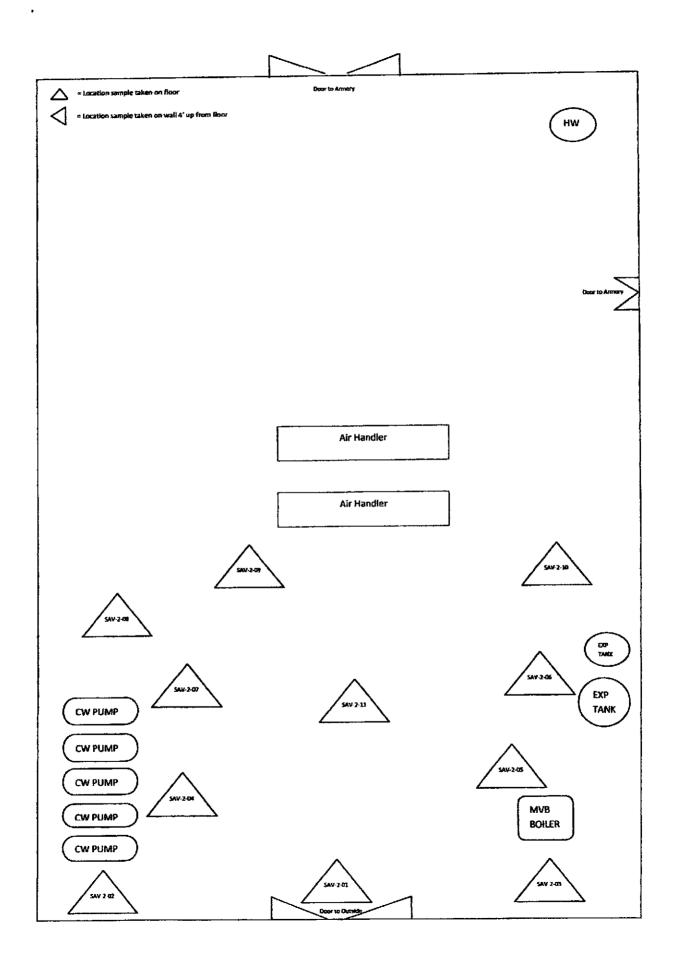
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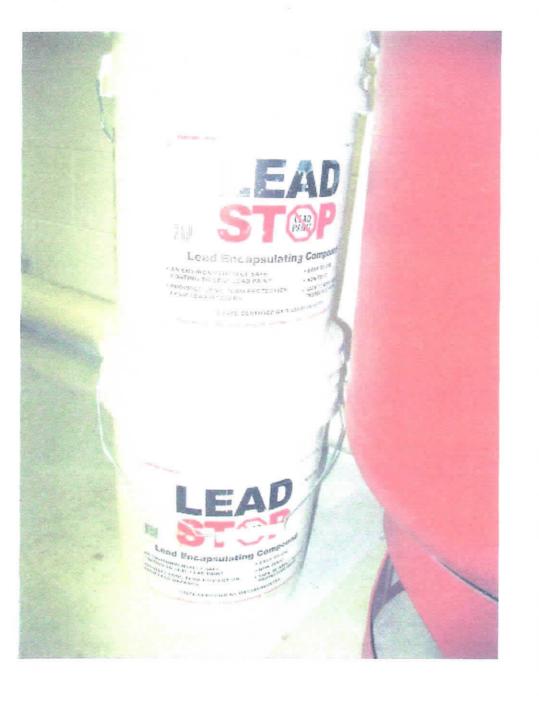
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Client: Project: Lab Order:	National Guard Bureau Region-South IH Savannah Indoor Firing Range 1105711	on-South IH ge			Dates Report	eport	
(ah Samnle ()	Class Security						
1105711-001A	SAV-2-01	5/5/2011 12:30:00PM	Wipe	Test Name LEAD ON WIDES (NOTORIA)	TCLP Date	Prep Date	Analysis Date
1105711-002A	SAV-2-02	5/5/2011 12:30:00PM	Wipe	LEAD ON WIPES (N91007082)			1102/60/00/00
1105711-003A	SAV-2-03	5/5/2011 12:30:00PM	Wipe	LEAD ON WIPES (N9100/7082)		05/09/2011	05/06/2011
1105711-004A	SAV-2-04	5/5/2011 12:30:00PM	Wipe	LEAD ON WIPES (N9100/7082)		05/09/2011	05/09/2011
1105711-005A	SAV-2-05	5/5/2011 12:30:00PM	Wipe	LEAD ON WIPES (N9100/7082)		05/09/2011	05/09/2011
1105711-006A	SAV-2-06	5/5/2011 12:30:00PM	Wipe	LEAD ON WIPES (N9100/7082)		05/09/2011	05/09/2011
1105711-007A	SAV-2-07	5/5/2011 12:30:00PM	Wipe	LEAD ON WIPES (N9100/7082)		05/09/2011	05/09/2011
1105711-008A	SAV-2-08	5/5/2011 12:30:00PM	Wipe	LEAD ON WIPES (N9100/7082)		05/09/2011	05/09/2011
1105711-009A	SAV-2-09	5/5/2011 12:30:00PM	Wipe	LEAD ON WIPES (N9100/7082)		05/09/2011	05/09/2011
1105711-010A	SAV-2-10	5/5/2011 12:30:00PM	Wipe	LEAD ON WIPES (N9100/7082)		05/09/2011	05/09/2011
1105711-011A	SAV-2-11	5/5/2011 12:30:00PM	Wipe	LEAD ON WIPES (N9100/7082)		05/09/2011	05/09/2011
1105711-012A	SAV-2-BLANK	5/5/2011 12:30:00PM	Wipe	LEAD ON WIPES (N9100/7082)		05/09/2011	05/09/2011
1105711-013A	SAV-2-BLANK	S/S/2011 12:30:00PM	Wipe	LEAD ON WIPES (N9100/7082)		05/09/2011	05/09/2011
1105711-014A	SAV-2-BLANK	5/5/2011 1:30:00PM	Wipe	LEAD ON WIPES (N9100/7082)		05/09/2011	05/09/2011

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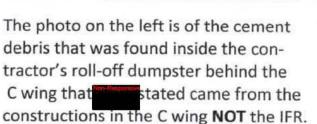


SAVANNAH READINESS CENTER-PHOTO LOG RENOVATIONS-IFR & ROLL-OFF BIN)



These two photos are of the floor where the contaminated cement was taken out of inside the IFR.







This photo is of the clothing that was found hanging over the contractor's roll-off dumpster behind the C wing.

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NATIONAL GUARD REGION SOUTH INDUSTRIAL HYGIENE OFFICE 510 PLAZA DRIVE, SUITE 1530 COLLEGE PARK, GA 30349

ARNG-CSG-P

March 23, 2011

MEMORANDUM FOR CPT<mark>Non-Responsive</mark> Georgia Army National Guard, 118th Field Artillery, 1248 Eisenhower Drive, Savannah, GA 31406.

TO: Mr. Non-Responsive Project Manager, Georgia Army National Guard, CFMO, Bldg 70, 1000 Halsey Ave, Marietta, GA 30062.

SUBJECT: Savannah National Guard Armory, Lead Sampling Survey 4 January 2011, Savannah, Georgia.

1. References.

- a. Department of Defense Instruction 6055.1, Department of Defense Occupational Safety and Health (OSH) Program, 26 October 1984.
- b. Army Regulation (AR) 40-5, Medical Service, Preventive Medicine, 22 July 2005.
- c. National Guard Regulation (NGR) 385-10, Army National Guard Safety and Occupational Health Program, 1988.
- d. AR 385-10, The Army Safety Program, 29 February 2000.
- NGR Pam 420-15, Guidelines and Procedures for Rehabilitation and Conversion of Indoor Firing Ranges, 3 November 2006.
- f. NGR 385-15, Policy and Responsibilities, Evaluation and Operation of Army National Guard Indoor Firing Ranges, 3 November 2006.
- g. DA PAM 40-503, The Army Industrial Hygiene Program, 30 October 2000.
- h. Industrial Ventilation, 23rd Edition, American Conference of Governmental Industrial Hygienist, Cincinnati, Ohio.
- i. Title 29, Code of Federal Regulations (CFR), 2001 rev., part 1910, Occupational Safety and Health Standards.

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FOIA Requested Record #J-15-0085 (GA) Released by National Guard Bureau Page 286 of 378

2. General.

- a. As requested by Mr.^{Non-Responsive} CFMO. Clearance sampling was conducted at the referenced site. The objective of the visit was to determine if the Indoor Firing Range (IFR) was free of lead after clean-up by the contractor.
- b. Mr. Non-Responsive Regional Industrial Hygienist with the National Guard Region South Industrial Hygiene Office in College Park Georgia performed the lead sampling 4 January 2011.

3. Findings. The laboratory results indicate lead concentrations above the IFR post cleaning standard of 200 micro grams per square foot.

Sample Number	Sample Location	Laboratory Results ¹
MKF-5001	Front of room at firing line	1030
MKF-5002	Approx 10 ft in front of bullet stop area	695
MKF-5003	Left wall before bullet stop area	209
MKF-5004	Top of expansion tank in IFR	387
MKF-5005	Blank	BRL

The results of the lead dust sampling activities are summarized in the following table.

¹ Results reported in micrograms per square feet (µg/ft²)
 ² BRL = Below Reportable Limits

The laboratory report is attached for review.

4. Discussion. A follow-up meeting 4 March 2011 at the Savannah Armory was held with Mr. Non-Responsive the contractor (EnviroLogical Engineering inc.) and myself. Follow-up additional sampling was conducted by Mr. during that visit and meeting which again revealed lead levels above the recommended standards.

5. Recommendations. Reclean the IFR to get the lead levels below the standard of 200 micro grams per square foot and notify the Regional Industrial Hygiene Office, Mr. **Non-Responsive** to once again sample the Savannah Armory as soon as the contractor has finished the cleaning.

6. If additional information is needed about the above report, please contac Non-Responsing Regional Industrial/Hygienist at (404) 559-4174.



Regional Industrial Hygienist

CF: State Safety Office, GA, ATTN: LT Non-Responsive Safety and Occupational Health Manager, 1388 1st Street, Building 840, Dobbins ARB, GA 30069.

CF: Georgia Department of Defense, ATTN: COL CFMO-Chief, Building 70, 1000 Halsey Ave, Marietta, GA 30062.

CF: Georgia Department of Defense, ATTN: Mr.^{Non-Responsive} Facilities Maintenance Manager, Building 12, 935 E. Confederate Avenue, SE, Atlanta, GA 30316.

Mr.Non-Responsive Georgia Army National Guard, CFMO-Environmental Officer, Post Office Box 437, Hinesville, GA 31315-5066.

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Released by National Guard Bureau Page 289 of 378

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Analytical Environmental Services, Inc

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Lab Order:	1101B96
Client:	National Guard Bureau Region-South IH
Project:	Savannah Armory
Matrix:	Wipe
Date Received:	1/20/2011 11:55:00 AM

LEAD ON WIPES (N9100/7082)

N7082

Laboratory ID	Client Sample ID	Result	Units	Reporting Limit	DF	Qual	Date Collected	Date Analyzed	Analyst
1101B96-001A	MKF-5001	1030	ug, Total	41	2.07		01/04/2011	01/21/2011	JY
1101 B96-002A	MKF-5002	695	ug, Total	20	1		01/04/2011	01/21/2011	JY
1101B96-003A	MKF-5003	209	ug, Total	20	1		01/04/2011	01/21/2011	JY
1101B96-004A	MKF-5004	387	ug, Total	20	1		01/04/2011	01/21/2011	JY
1101B96-005A	MKF-5005	BRL	ug, Total	20	l		01/04/2011	01/21/2011	JY

B - Analyte detected in the associated Method Blank

Results are blank corrected where applicable

DF - Dilution Factor



NATIONAL GUARD REGION SOUTH INDUSTRIAL HYGIENE OFFICE 510 PLAZA DRIVE, SUITE 1530 COLLEGE PARK, GA 30349

NGB-ARS-SEIH

September 11, 2008

MEMORANDUM THRU LT. Deputy State Surgeon, Georgia Army National Guard, Medical Command, 5019 Highway 42, Ellenwood, GA 30294.

TO: Mr. Non-Responsive Georgia Army National Guard, CFMO-Environmental Officer, Post Office Box 437, Hinesville, GA 31315-5066.

SUBJECT: Valdosta National Guard Armory, Lead Sampling Survey, Valdosta, Georgia.

1. References.

- a. Department of Defense Instruction 6055.1, Department of Defense Occupational Safety and Health (OSH) Program, 26 October 1984.
- b. Army Regulation (AR) 40-5, Medical Service, Preventive Medicine, 22 August 2005.
- c. National Guard Regulation (NGR) 385-10, Army National Guard Safety and Occupational Health Program, 1988.
- d. AR 385-10, The Army Safety Program, 29 February 2000.
- e. NGR Pam 420-15, Guidelines and Procedures for Rehabilitation and Conversion of Indoor Firing Ranges, 3 November 2006.
- f. NGR 385-15, Policy and Responsibilities, Evaluation and Operation of Army National Guard Indoor Firing Ranges, 3 November 2006.
- g. DA PAM 40-503, The Army Industrial Hygiene Program, 30 October 2000.
- h. Threshold Limit Values and Biological Exposure Indices (TLV's) for 2003, American Conference of Governmental Industrial Hygienists (ACGIH), Cincinnati, Ohio.
- i. Industrial Ventilation, 23rd Edition, American Conference of Governmental Industrial Hygienist, Cincinnati, Ohio.
- j. Title 29, Code of Federal Regulations (CFR), 2001 rev., part 1910, Occupational Safety and Health Standards.

NGB-ARS-SEIH

SUBJECT: Lead Sampling Survey, Valdosta Armory, Valdosta, Georgia.

2. General.

- a. As requested by, Georgia Occupational Health Office, personnel with the National Guard Region South Office performed a visual inspection at the referenced site. The apparent objective of the inspection was to collect surface wipe samples from the former Indoor Firing Range (IFR) for analysis of total lead to confirm/deny the presence of lead dust at concentrations above regulatory standards.
- b. Sergeant (SGT) Non-Responsive Hygiene Office in College Park Georgia performed the site visit.

3. Findings.

General Information

On August 26, 2008, a site visit was conducted and at the time of the sampling activity, the interior of the former IFR appeared to have undergone conversion to a training/classroom. The flooring was observed to be covered with vinyl floor tile and there was a drop ceiling present completed with 2 feet by 2 feet acoustical ceiling panels. Painted cinder-block walls were observed with offices constructed near the area identified as the former location of the bullet stop. As a result of the renovated room, sampling locations were limited to exposed wall surfaces and flooring.

Sampling Activities

Based on the number of surfaces observed, samples were collected in accordance with NG Pam 420-15. Lead dust samples were collected using Ghost Wipes[™] which are premoistened media made of non-woven polyvinyl alcohol fiber and approved by American Industrial Hygiene Association (AIHA) for lead sampling. The wipes also meet all American Standards Testing Materials (ASTM) Designation E1792-96E specifications for sampling materials for lead in surface dust.

The surface samples were collected by SGT using a 1 square foot sampling template placed on the surface area identified for sampling. The area within the template was wiped using a new Ghost WipeTM. After the area inside the template was wiped, the sampling media was placed into a labeled re-sealable plastic bag and sealed. After each sample collection, a new surface area template was used and new disposable gloves were donned. A total of 18 samples were collected from each exposed surface area of the former IFR including 2 from office furniture observed inside the former IFR. There were no samples collected from the ceiling as a result of the presence of the acoustical panels.

Collected samples were submitted to Analytical Environmental Services, Inc. (AES) in Atlanta, Georgia for subsequent analysis of total lead. In addition, one wipe sample was placed into a re-sealable bag and submitted as field blank samples for analysis.

Laboratory Results

The laboratory results did not indicate the presence of lead concentrations above the IFR post cleaning standard of 200micrograms per feet squared ($\mu g/ft^2$). These sampling results indicate that any previous decontamination activities appear to be adequate to remove the lead dust from the former range at acceptable levels. It should be noted that

NGB-ARS-SEIH

the sampling activities were completed in a former IFR which has undergone conversion/renovation.

Sample Number	Sample Location	Laboratory Results ¹
VA-01	Lower Wall at Former Bullet Stop	BRL ²
VA-02	Middle Wall at Former Bullet Stop	BRL
VA-03	Upper Wall at Former Bullet Stop	BRL
<u>VA-04</u>	Lower Right Wall	87
VA-05	Middle Right Wall	BRL
VA-06	Upper Right Wall	BRL
VA-07	Lower Rear Wall	BRL
VA-08	Middle Rear Wall	BRL
VA-09	Upper Rear Wall	BRL
VA-10	Lower Left Wall	BRL
VA-11	Middle Left Wall	BRL
VA-12	Upper Rear Wall	BRL
VA-13	Floor, Electrical Room	BRL
VA-14	Floor, Telecom Room	BRL
VA-15	Floor Outside Former Bullet Stop	BRL
VA-16	Field Blank	BRL
VA-17	Wooden Field Table	BRL
VA-18	Metal Wall Locker	108

The results of the lead dust sampling activities are summarized in the following table.

Results reported in micrograms per square feet (ug/ft²)

² BRL = Below Reportable Limits

The laboratory report, including the Chain of Custody record is attached for review.

4. Recommendations.

- The former IFR inside the Valdosta Armory has been converted to a a. training/storage room and it appears that lead dust is not present at concentrations above the NGB standard of 200 μ g/ft². It should be noted that the sampling activities were limited to exposed areas observed inside the former IFR.
- b. In accordance with NGB Pamphlet 420-15, continue lead testing on an annual basis to verify that lead has not migrated from the substrate. The annual sampling shall include areas of the ceiling, walls and floors. Following the annual sampling event, if lead concentrations are less than 200 μ g/ft², the walls of the former IFR shall be coated with a lead dust encapsulant. Conventional paint can not be used as an encapsulant. It should be noted that the referenced guidance document does not address coating the ceiling. However, it appears that the presence of the drop ceiling with acoustical ceiling panels would be sufficient barrier to prevent potential lead migration and exposure.

5. If additional information is needed about the contractors report, please contact SGT Non-Responsive Regional Industrial Hygiene Technician, 1-800-362-0262 OR COMMERCIAL (404) 559-4174.



Regional Industrial Hygienist

CF: Georgia Army National Guard, ATTN: LT Non-Responsive Deputy State Surgeon Office, 5019 Highway 42, Ellenwood, GA 30294.

CF: State Safety Office, GA, ATTN: MAJ Non-Responsive Safety and Occupational Health Manager, 1388 1st Street, Building 840, Dobbins ARB, GA 30069.

CF: Georgia Department of Defense, ATTN: Mr. Non-Responsive Building 21, 935 E. Confederate Avenue, SE, Atlanta, GA 30316.

CF: Georgia Department of Defense, ATTN: Mr Non-Responsive Facilities Maintenance Manager, Building 12, 935 E. Confederate Avenue, SE, Atlanta, GA 30316.

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ANALYTICAL ENVIRONMENTAL SERVICES, INC.

September 05, 2008

Non-Responsive

National Guard Bureau Region-South IH 510 Plaza Drive, Suite 1530 Suite 1530 College Park, GA 30349

TEL: (404) 559-4174 FAX: (404) 559-4175

RE: Valdosta Armory

DearNon-Responsive

Order No.: 0808K24

Analytical Environmental Services, Inc. received 18 samples on 8/29/2008 3:15:00 PM for the analyses presented in the following report.

No problems were encountered during the analyses. Additionally, all results for the associated Quality Control samples were within EPA and/or AES established limits. Any discrepancies associated with the analyses contained herein will be noted and submitted in the form of a project Case Narrative.

AES' certifications are as follows:

-NELAC/Florida Certification number E87582 for analysis of Environmental Water, soil/hazardous waste, and Drinking Water Microbiology, effective 07/01/08-06/30/09. -AIHA Certification ID #100671 for Industrial Hygiene samples (Organics, Inorganics), Environmental Lead (Paint, Soil, Dust Wipes, Air), and Environmental Microbiology (Fungal) effective until 08/01/09.

These results relate only to the items tested. This report may only be reproduced in full and contains $\frac{1}{2}$ total pages (including cover letter).

If you have any questions regarding these test results, please feel free to call.



Project Manager

3785 Presidential Parkway • Atlanta, Georgia 30340 • Tel: (770) 457-8177 • FAX: (770)457-8188

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Work Order: O [8/24/48 Page 1 -	Visit our website	www.aesatlanta.com	to check on the status of	your results, place bottle	orders, etc.		REMARKS		1 'X 1' Samp													-)	RECEIPT	Total # of Containets	Turnaround Turse Respices	Standard 5 Business Days	O 2 Husiness Fay Rush		OC Some Day Rush (auth req.)	PT VITE BUY STRATE AND ADDRESS	E-mail? Y. N. Fac' Y	DATA PACKAGE I II	D TAT.
CHAIN OF CUSTODY ^{Date:} <u></u>	ANALYSIS REQUESTED						PRESERVATION (See codes)																PROJECT INFORMATION	VG /0/05 /2 Armory	CT #	SITE ADDRESS	NOTER	SEND REPORT TO	(NVOICE TO: AN DIADERMAT FROM ABOATS)			E#:	NEXT BUSINESS DAY, IF NO TAT IS MARKED ON COC AES WILL PROCEED AS STANDARD TAT. Reancements are made.
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NA * None White Copy - Original: Yellow Copy - Client

Page 296 of 378

Work Urder: OFOF M29		Visit our website	www.acsatlanta.com	vour results, place bottle	orders, etc.	<i>• म</i> •N	RIALVAKS	1'X1' Sam Pla 1	V	1'X 1' SOMP/C 1	1 11	B	ES	AV	AIL	ABLI	CO	PY			RECEIPT	Total # of Containers 1/8	Turnaround Time Request	Standard 5 Business Davis	DO 2 Husiness Day Kush		Same Day Rush (outh reg.) Other	STATE PROGRAM (if any).	B-math Y N, Fax' Y N	DATA PACKAGE 1 II (II IV	ARD TAT.	VA = N.M.
CHAIN OF CUSTODY		ANALY SIS REQUESTIED					PRESIERVATION (See endes)		X		×										PROJECT INFORMATION	PROTECT NAME	1 H:	SUTH ALYCRAESS		SEND REPORT TV	INVORE TO (JF DIFFRENT PROM APOVE)			QUOTE # PKM	<u>Ë NO TAT IS MARKED ON COCAES WHL PROCEED AS STAND.</u> Adde	NAMELY AKE DIALVARIU OF OUR A AVELYA VANIE DEFINITION OF AN AVELANDER AND AVELANDER (Blanks) O = (Mark (specify) MATRIX (MAPA) A AU (1W (specify)) (MATRIX (MAPA)) A AU (MARK (specify)) (MATRIX (MAPA)) (MARK (specify)) (MARK (sp
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Page 297 of 378

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Analytical Environmental Services, Inc.

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Sample/Cooler Receipt Checklist

Client GH Army	_	Work Order Number	0108424
Checklist completed by	al sols Date		
Carrier name: FedEx UPS Courier Client	US Mail Oth	er	
Shipping container/cooler in good condition?	Yes	No Not Present	_
Custody seals intact on shipping container/cooler?		No Not Present	
Custody seals intact on sample bottles?	Yes	No Not Present	~
Container/Temp Blank temperature in compliance? (No	
Cooler #1 Arrbit ¹⁴ Cooler #2 Cooler #3	Cooler #4	Cooler#5	Cooler #6
Chain of custody present?	Yes	No	
Chain of custody signed when relinquished and received?	Yes	No	
Chain of custody agrees with sample labels?	Yes	No	
Samples in proper container/bottle?	Yes	No	
Sample containers intact?	Yes	No	
Sufficient sample volume for indicated test?	Yes	No	
All samples received within holding time?	Yes	No	
Was TAT marked on the COC?	Yes	No	
Proceed with Standard TAT as per project history?	Yes	No Not Appli	cable
Water - VOA vials have zero headspace? No VOA via	ds submitted	Yes No	_
Water - pH acceptable upon receipt?	Yes	No Not Appli	cable
Adjusted?	Cł	necked by	
Sample Condition: Good Other(Explain)			
(For diffusive samples or AlHA lead) Is a known blank in	icluded? Ye	es No	

See Case Narrative for resolution of the Non-Conformance.

* Samples do not have to comply with the given range for certain garameters.

HAQuality Assurance/Checklists Procedures Sign-Off/Templates/Checklists/Sample Receipt Checklists/Sample Cooler Receipt Checklist

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Analytical Environmental Services, Inc.

Date: 9/5/2008

LEAD ON WIPES (N9100/7082) N7082

		11 	1002
CLIENT:	National Guard Bureau Region-South [H	Lab Order:	0808K24
Project:	Valdosta Armory	Date Received:	8/29/2008 3:15 PM
Delivery Ord	er:	Matrix:	Wipe
PO No:			

Laboratory	Client Sample	Results	Units	Report	DF	Date	Date	Analyst
D ID	ID			Limit.		Collected	Analyzed	
0808K24-001A	VA-01	BRL	μg/ft²	20	1	8/27/2008	9/5/2008	TAA
0808K24-002A	VA-02	BRL	µg/ft²	20	1	8/27/2008	9/5/2008	TAA
0808K24-003A	VA-03	BRL	µg/ft²	20	ι	8/27/2008	9/5/2008	TAA
0808K24-004A	VA-04	87	μg/ft²	20	1	8/27/2008	9/5/2008	TAA
0808K24-005A	VA-05	BRL	μg/ft²	20	1	8/27/2008	9/5/2008	TAA
0808K24-006A	VA-06	BRL	µg/ft²	20	1	8/27/2008	9/5/2008	TAA
0808K24-007A	VA-07	BRL	μg/ft²	20	1	8/27/2008	9/5/2008	TAA
0808K24-008A	VA-08	BRL	µg∕ft²	20	1	8/27/2008	9/5/2008	TAA
0808K24-009A	VA-09	BRĹ	μg/ft²	20	1	8/27/2008	9/5/2008	TAA
0808K24-010A	VA-10	BRL	$\mu g/ft^2$	20	1	8/27/2008	9/5/2008	TAA
0808K24-011A	VA-11	BRL	μg/ft²	20	L	8/27/2008	9/5/2008	TAA
0808K24-012A	VA-12	BRL	μg/ft²	20	1	8/27/2008	9/5/2008	TAA
0808K24-013A	VA-13	BRL	μg/ft²	20	1	8/27/2008	9/5/2008	TAA
0808K24-013A	VA-14	BRL	μg/ft²	20	1	8/27/2008	9/5/2008	TAA
0808K24-015A	VA-15	BRL	µg/ft²	20	1	8/27/2008	9/5/2008	TAA
0808K24-016A	VA-16	BRL	ug, Total	20	1	8/27/2008	9/5/2008	TAA
0808K24-017A	VA-17	BRL	μg/ft²	20	l	8/27/2008	9/5/2008	TAA
0808K24-017A	VA-18	108	μg/ft²	20	1	8/27/2008	9/5/2008	TAA

Qualifiers:

BRL - Not Detected at the Reporting Limit

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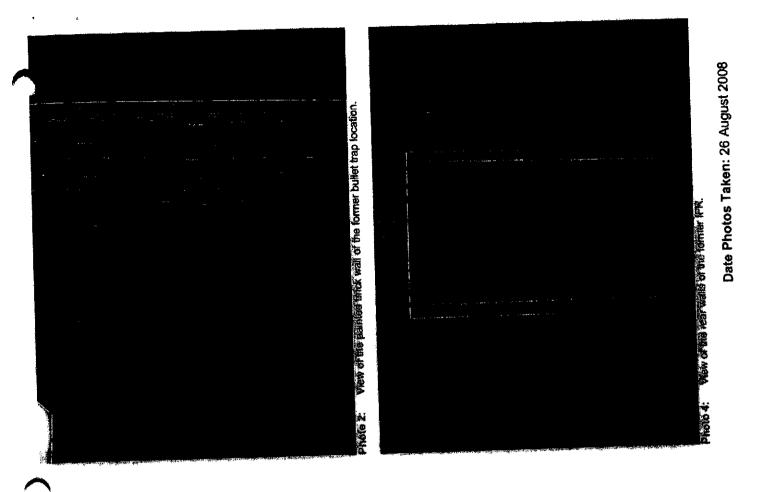
Page 1 of 1

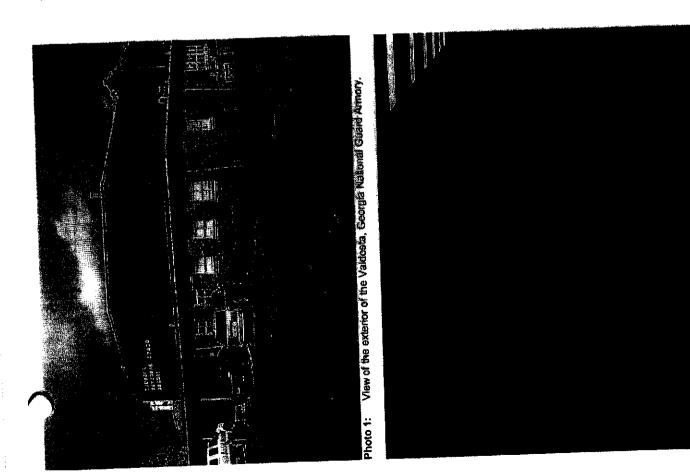
. . -

FOIA Requested Record #J-15-0085 (GA) Released by National Guard Bureau

Page 299 of 378

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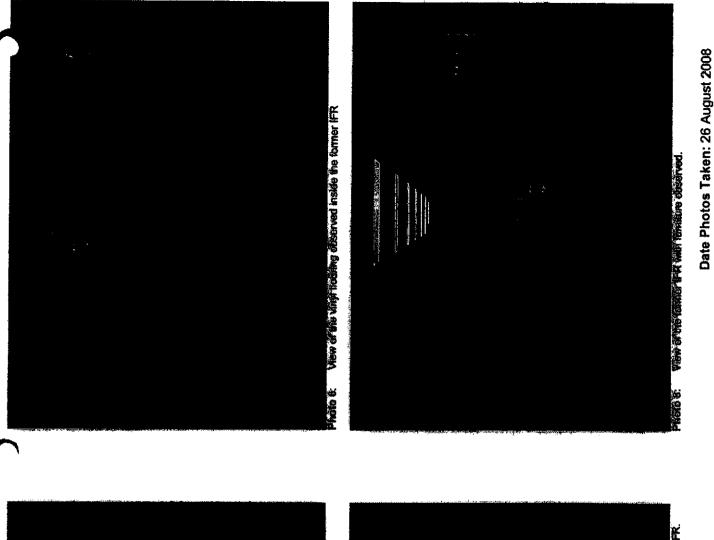


Project Name: Valdosta, Georgia Armory

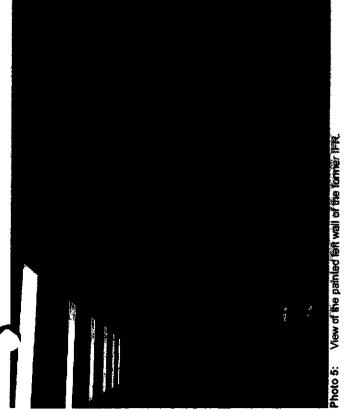
Photo 3: View of right wall with painted surface.

FOIA Requested Record #J-15-0085 (GA) Released by National Guard Bureau-Page 300 of 378





Project Name: Valdosta, Georgia Armory



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FOIA Requested Record #J-15-0085 (GA) Released by National Guard Bureau Page 301 of 378



NATIONAL GUARD REGION SOUTH INDUSTRIAL HYGIENE OFFICE 510 PLAZA DRIVE, SUITE 1530 COLLEGE PARK, GA 30349

NGB-ARS-SEIH

September 12, 2008

MEMORANDUM THRU LT. Deputy State Surgeon, Georgia Army National Guard, Medical Command, 5019 Highway 42, Ellenwood, GA 30294.

TO: Mr. Non-Responsive Georgia Army National Guard, CFMO-Environmental Officer, Post Office Box 437, Hinesville, GA 31315-5066.

SUBJECT: Waycross Army National Guard Armory, Lead Sampling Survey, Waycross, Georgia.

1. References.

- a. Department of Defense Instruction 6055.1, Department of Defense Occupational Safety and Health (OSH) Program, 26 October 1984.
- b. Army Regulation (AR) 40-5, Medical Service, Preventive Medicine, 22 August 2005.
- c. National Guard Regulation (NGR) 385-10, Army National Guard Safety and Occupational Health Program, 1988.
- d. AR 385-10, The Army Safety Program, 29 February 2000.
- e. NGR Pam 420-15, Guidelines and Procedures for Rehabilitation and Conversion of Indoor Firing Ranges, 3 November 2006.
- f. NGR 385-15, Policy and Responsibilities, Evaluation and Operation of Army National Guard Indoor Firing Ranges, 3 November 2006.
- g. DA PAM 40-503, The Army Industrial Hygiene Program, 30 October 2000.
- h. Threshold Limit Values and Biological Exposure Indices (TLV's) for 2003, American Conference of Governmental Industrial Hygienists (ACGIH), Cincinnati, Ohio.
- i. Industrial Ventilation, 23rd Edition, American Conference of Governmental Industrial Hygienist, Cincinnati, Ohio.
- j. Title 29, Code of Federal Regulations (CFR), 2001 rev., part 1910, Occupational Safety and Health Standards.

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FOIA Requested Record #J-15-0085 (GA) Released by National Guard Bureau Page 302 of 378 NGB-ARS-SEIH

SUBJECT: Lead Sampling Survey, Waycross Armory, Waycross, Georgia.

2. General.

- a. As requested by, Georgia Occupational Health Office, personnel with the National Guard Region South Office performed a visual inspection at the referenced site. The apparent objective of the inspection was to collect surface wipe samples from the former Indoor Firing Range (IFR) for analysis of total lead to confirm/deny the presence of lead dust at concentrations above regulatory standards.
- b. Sergeant (SGT)^{Non-Responsive} with the National Guard Region South Industrial Hygiene Office in College Park Georgia performed the site visit.

3. Findings.

General Information

On August 27, 2008, a site visit was conducted and at the time of the sampling activity, the bullet stop was observed inside the firing range. It was also noted that the armory was vacant and was currently used for storing items used for emergency activities, to include blankets, pillows with insulation also observed. The surface areas inside the former IFR were observed to be constructed of cinder-block walls with concrete floors and the ceiling was constructed of metal covered with sound proofing. Portions of the walls were covered with sound-proofing materials. At the rear of the firing range a wooden/particle board constructed partition with Plexiglas windows was observed. The rear wall of the former range was beyond the partition and was accessible for lead sample collection.

Sampling Activities

Based on the number of surfaces observed, samples were collected in accordance with NG Pam 420-15. The dust samples were collected using Ghost Wipes[™] which are premoistened media made of non-woven polyvinyl alcohol fiber and approved by American Industrial Hygiene Association (AIHA) for lead sampling. The wipes also meet all American Standards Testing Materials (ASTM) Designation E1792-96E specifications for sampling materials for lead in surface dust.

The surface samples were collected by SGT using a 1 square foot sampling template placed on the surface area identified for sampling. The area within the template was wiped using a new Ghost WipeTM. After the area inside the template was wiped, the sampling media was placed into a labeled re-sealable plastic bag and sealed. After each sample collection, a new surface area template was used and new disposable gloves were donned. A total of 19 samples were collected including three from each surface area for submittal to Analytical Environmental Services, Inc. (AES) in Atlanta, Georgia for subsequent analysis of total lead. In addition, one wipe sample was placed into a resealable bag and submitted as field blank samples for analysis.

Laboratory Results

The laboratory results indicate lead concentrations detected above the IFR post cleaning standard. These sampling results indicate that any previous decontamination activities were not adequate to remove the lead dust from the former range at acceptable levels. In accordance with the National Guard Bureau Pamphlet 420-15, the IFR cannot be

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FOIA Requested Record #J-15-0085 (GA) Released by National Guard Bureau Page 303 of 378 SUBJECT: Lead Sampling Survey, Waycross Armory, Waycross, Georgia.

converted for other uses until the lead dust levels are reduced to $200\mu g/ft^2$ or lower depending on local requirements.

Sample Number	Sample Location	Laboratory Results ¹
WA-01	Lower Wall, Bullet Stop	71,300
WA-02	Middle Wall, Bullet Stop	3,910
WA-03	Upper Wall, Bullet Stop	244
WA-04	Lower Right Wall	1,060
WA-05	Middle Right Wall	41
WA-06	Upper Right Wall	131
WA-07	Lower Rear Wall	203
WA-08	Middle Rear Wall	592
WA-09	Upper Rear Wall	303
WA-10	Lower Left Wall	1,140
WA-11	Middle Left Wall	52
WA-12	Upper Left Wall	491
WA-13	Floor at Bullet Stop	2,890
WA-14	Middle Floor	533
WA-15	Floor at Rear Wall	578
WA-16	Ceiling at Bullet Stop	BRL ²
WA-17	Middle Ceiling	BRL
WA-18	Ceiling at Rear Wall	41
WA-19	Wooden Table, Top	94

The results of the lead dust sampling activities are summarized in the following table.

¹ Results reported in micrograms per square feet (µg/ft²)

² BRL = Below Reportable Limits

The laboratory report, including the Chain of Custody record is attached for review.

4. Recommendations.

NGB-ARS-SEIH

- a. Ensure that the former indoor firing range remains closed and secured to prevent unauthorized entry into this area.
- b. Review NG Bureau Pamphlet 420-15 prior to conducting decontamination of the IFR and conduct cleaning activities in accordance with the regulatory document. Keep in mind that EPA (40 CFR Subpart D) and your state may have lead reduction levels lower than the levels recommended in NG Bureau Pamphlet 420-15.
- c. Prior to initiating decontamination activities and in accordance with 29 CFR 1910.1025, perform and conduct training for employees exposed to lead concentrations above the standard or who may suffer skin or eye irritation from exposure to lead.

SUBJECT: Lead Sampling Survey, Waycross Armory, Waycross, Georgia.

- d. Ensure that appropriate personal protective equipment is worn during decontamination activities.
- e. Consult with local Environmental Agency for guidance on proper disposal of materials used in decontaminating the IFR.
- f. Upon completion of the decontamination activities, contact the Regional IH office for evaluation and collection of confirmatory lead dust samples.

5. If additional information is needed about the contractors report, please contact SGT Non-Responsive Regional Industrial Hygiene Technician, 1-800-362-0262 OR COMMERCIAL (404) 559-4174.



Regional Industrial Hygienist

CF: Georgia Army National Guard, ATTN: LT Non-Responsive Deputy State Surgeon Office, 5019 Highway 42, Ellenwood, GA 30294.

CF: State Safety Office, GA, ATTN: MAJ. Non-Responsive Safety and Occupational Health Manager, 1388 1st Street, Building 840, Dobbins ARB, GA 30069.

CF: Georgia Department of Defense, ATTN: Mr. Non-Responsive CFMO-ENV Building 21, 935 E. Confederate Avenue, SE, Atlanta, GA 30316.

CF: Georgia Department of Defense, ATTN: Mr. Mon-Responsive Manager, Building 12, 935 E. Confederate Avenue, SE, Atlanta, GA 30316. BEST AVAILABLE COPY



ANALYTICAL ENVIRONMENTAL SERVICES, INC.

September 05, 2008

Non-Responsive

National Guard Bureau Region-South III 510 Plaza Drive, Suite 1530 Suite 1530 College Park, GA 30349

TEL: (404) 559-4174 FAX: (404) 559-4175

RE: Waycross Armory

Dear Non-Responsive

Order No.: 0808K08

Analytical Environmental Services, Inc. received 19 samples on 8/29/2008 3:15:00 PM for the analyses presented in the following report.

No problems were encountered during the analyses. Additionally, all results for the associated Quality Control samples were within EPA and/or AES established limits. Any discrepancies associated with the analyses contained herein will be noted and submitted in the form of a project Case Narrative.

AES' certifications are as follows:

-NELAC/Florida Certification number E87582 for analysis of Environmental Water, soil/hazardous waste, and Drinking Water Microbiology, effective 07/01/08-06/30/09. -AIHA Certification ID #100671 for Industrial Hygiene samples (Organics, Inorganics), Environmental Lead (Paint, Soil, Dust Wipes, Air), and Environmental Microbiology (Fungal) effective until 08/01/09.

These results relate only to the items tested. This report may only be reproduced in full and contains 5, total pages (including cover letter).

If you have any questions regarding these test results, please feel free to call.



Project Manager

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Analytical Environmental Services, Inc.

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Sample/Cooler Receipt Checklist

Client NG-IDN Cl Guar		Work Order Number	0808 Kas
Checklist completed by Signat Da	8/30/8 ate		
Carrier name: FedEx UPS Courier Client //	US Mail Oth	er	
Shipping container/cooler in good condition?	Yes	No Not Present	_
Custody seals intact on shipping container/cooler?		No Not Present	
Custody seals intact on sample bottles?	Yes 1/2014	No Not Present	
Container/Temp Blank temperature in compliance? (No	
Cooler #1 Arrbn Cooler #2 Cooler #3	Cooler #4	Cooler#5	Cooler #6
Chain of custody present?	Yes 🧹	No	
Chain of custody signed when relinquished and received?	Yes _	No	
Chain of custody agrees with sample labels?	Yes	No	
Samples in proper container/bottle?	Yes 🧹	No	
Sample containers intact?	Yes	No	
Sufficient sample volume for indicated test?	Yes	No	
All samples received within holding time?	Yes	No	
Was TAT marked on the COC?	Yes	No	
Proceed with Standard TAT as per project history?	Yes	No <u>Not Applica</u>	able
Water - VOA vials have zero headspace? No VOA vials	s submitted	Yes No	
Water - pH acceptable upon receipt?	Yes	No Not Applie	able
Adjusted?	Cł	necked by	
Sample Condition: Good <u>Other(Explain)</u> (For diffusive samples or AlHA lead) Is a known blank inc		and the second se	

See Case Narrative for resolution of the Non-Conformance.

* Samples do not have to comply with the given range for certain parameters

\EQuality Assurance: Checklists Procedures Sign-Off Templates\Checklists\Sample Receipt Checklists\Sample_Cooler_Receipt_Checklist

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Analytical Environmental Services, Inc.

Date: 9/16/2008

LEAD ON WIPES (N9100/7082)

N7082

CLIENT:	and a most of the second of th	Lab Order:	0808K08
Project:	Waycross Armory	Date Received:	8/29/2008 3:15 PM
Delivery Ord	ler:	Matrix:	Wipe
PO No:			

Laboratory	Client Sample	Results	Units	Report	DF	Date	Date	Analyst	
ID	ID			Limit.		Collected	Analyzed		
0808K08-001A	WA-01	71300	μg/ft²	2000	100	8/27/2008	9/4/2008	ТАА	
0808K08-002A	WA-02	3910	μg/ft²	86	4.32	8/27/2008	9/4/2008	TAA	
0808K08-003A	WA-03	244	μg/ft²	20	1	8/27/2008	9/4/2008	TAA	
0808K08-004A	WA-04	1060	μg/ft²	42	2.11	8/27/2008	9/4/2008	TAA	
0808K08-005A	WA-05	41	μg/ft²	20	1	8/27/2008	9/4/2008	ТЛА	
0808K08-006A	WA-06	131	μg/ft²	20	1	8/27/2008	9/4/2008	TAA	
0808K08-007A	WA-07	203	μg/ft²	20	1	8/27/2008	9/4/2008	TAA	
0808K08-008A	WA-08	592	μg/ft²	20	1	8/27/2008	9/4/2008	TAA	
0808K08-009A	WA-09	303	μg/ft²	20	1	8/27/2008	9/4/2008	TAA	
0808K08-010A	WA-10	1140	μg/ft²	45	2.23	8/27/2008	9/4/2008	ТАА	
0808K08-011A	WA-11	52	μg/ft²	20	1	8/27/2008	9/4/2008	TAA	
0808K08-012A	WA-12	491	μg/ft²	20	1	8/27/2008	9/4/2008	TAA	
0808K08-013A	WA-13	2890	μg/ft²	78	3.9	8/27/2008	9/4/2008	ΤΑΛ	
0808K08-015A	WA-14	533	μg/ft²	20	1	8/27/2008	9/4/2008	TAA	
0808K08-015A	WA-15	578	μg/ft²	20	1	8/27/2008	9/4/2008	TAA	
0808K08-015A	WA-16	BRL	μg/ft²	20	1	8/27/2008	9/4/2008	TAA	
0808K08-017A	WA-17	BRL	μg/ft²	20	1	8/27/2008	9/4/2008	ТАА	
					1	8/27/2008	9/4/2008	TAA	
					1	8/27/2008	9/4/2008	TAA	
0808K08-018A 0808K08-019A	WA-18 WA-19	41 94	µg/ft² ug, Total	20 20	1 1				

Qualifiers:



Date Photos Taken: 27 August 2008

Photo 4: View of the left wall of the IFR.

Project Name: Waycross Georgia Armory

View of the painted right wall of the indoor firing range.

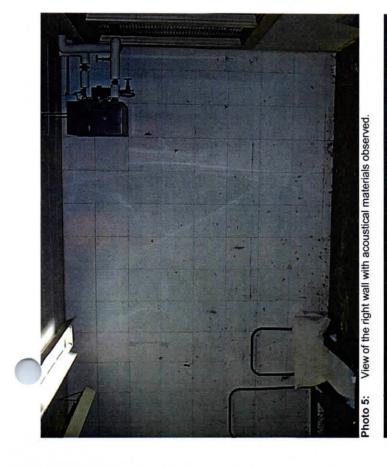
Photo 3:

FOIA Requested Record #J-15-0085 (GA) Released by National Guard Bureau Page 311 of 378

Date Photos Taken: 27 August 2008

Project Name: Waycross Georgia Armory

Photo 5: Vervord a portion of the celling of the indoor fitting range.







Industrial Hygiene Report For Georgia National Guard HHC 1st BN 121ST IN 95 Maynard St. Winder, Georgia 30680



Prepared for: National Guard Bureau Regional Industrial Hygiene Office Region South 510 Plaza Drive, Suite 1530 College Park, Georgia 30349



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ARNG-CSG-P

February 20, 2012

MEMORANDUM FOR: Georgia Army National Guard, ATTN: MAJ Mon-Responsive 95 Maynard St. Winder, GA 30680.

SUBJECT: HHC Company 1st BN 121ST IN and Downtown (Temporary) FMS Shop National Guard Armory February 17, 2012.

1. References.

- a) NG PAM 420-15, Guidelines and Procedures for Rehabilitation and Conversion of Indoor Firing Ranges, 3 November 2006.
- b) Department of Defense Instruction 6055.1, Department of Defense Occupational Safety and Health (OSH) Program, 26 October 1984.
- c) EPA, Guidance for Controlling Asbestos Containing Materials in Buildings, June 1985.
- d) MEMORANDUM SGPS-PSP, OTSG, subject: AMEDD Role Supporting Asbestos Abatement/ Asbestos Management Programs, 19 January 1989.
- e) TB MED 513, Guidelines for the Evaluation and Control of Asbestos Exposure, 15 December 1986. [10/2007 Under Revision as DA PAM 40-513]
- f) Army Regulation (AR) 40-5, Medical Service, Preventive Medicine, 22 July 2005.
- g) National Guard Regulation (NGR) 385-10, Army National Guard Safety and Occupational Health Program, 1988.
- h) DA PAM 40-503, The Army Industrial Hygiene Program, 30 October 2000.
- i) Title 29, Code of Federal Regulations (CFR), 2001 rev., part 1910, Occupational Safety and Health Standards.
- 2. General.
 - a) An Industrial Hygiene survey was conducted at HHC Company 1st BN 121ST IN National Guard Armory February 17, 2012. The purpose of this visit was to conduct a formal walk through while identifying hazards and making recommendations regarding those hazards. During the survey lead wipe test,

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FOIA Requested Record #J-15-0085 (GA) Released by National Guard Bureau Page 314 of 378

determining the presence of mold, and asbestos testing was conducted to determine if the previous mentioned hazards are present in the armory.

- b) Mr. Non-Responsive Industrial Hygienist, SSG Non-Responsive Industrial Hygiene Technician and SPC Non-Responsive Industrial Hygiene Technician, National Guard Bureau Regional Industrial Hygiene Office conducted the walk through.
- **3.** Instrumentation. The following instrumentation was used to determine ventilation rates, illumination measurements, and photographically document findings.
 - a) Extech Light Meter, Model 407026, S/N:Q009471, Calibrated: 07/20/2011
 - b) Canon camera, PowerShot A2200, S/N: 282063093333

4. Findings.

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Main Building

- a) Efflorescence was apparent in the walls of the Indoor Firing Range in the basement.
- b) Sewage back up in both the men and female latrine.
- c) Mold was found in the air conditioning units.
- d) Mold on walls because of apparent leaks from roof.
- e) Soldiers reported hearing rodents in the space between the ceiling and roof.
- f) Holes and watermarks were seen on ceiling panels throughout the facility. Ceiling panels were missing in some areas of the facility. Ceiling tile falling due to the amount of water leakage in staff occupied offices.
- g) Soldiers are occupying areas that are not properly ventilated.
- h) Rusty pipes in the boiler room. Damaged pipe insulation was seen throughout the facility.
- i) Water fountain leaks when plugged in.
- j) Light bulbs burned out and some were missing. Some light covers were stained.
- k) Material Safety Data Sheets (MSDS) were in binders with chemical inventory list.

FMS Downtown Temporary Building

- a) The latrine has apparent mold issues.
- b) Ceiling tiles has extreme water damage.
- c) Exhaust vents were dirty.
- d) Mold growing on the walls.
- e) Eyewash stations not working. Shower station was not present.
- f) No water in facility other than the latrine.
- g) Fire extinguisher is present but has not been serviced since 2008.

- h) Pipe insulation is damaged.
- i) Chemicals in flammable cabinet were not organized properly.
- j) Safety signs were seen in the area.

5. Lead

.i. . .i.

- a) Laboratory findings show that there is lead present in the samples taken from the Indoor Firing Range and also in the mortar bay area.
- b) The amount of lead found in these areas is significantly higher than the reporting limit.

The results are illustrated in the chart below.

Sample Number	Sample Location	Laboratory Results
MN080 HHC-121	Supply Vault Wall B	Not Detected
MN081 HHC- 121	Supply Vault Wall C	Not Detected
MN083 HHC- 121	Range Room Wall	Not Detected
MN084 HHC- 121	Indoor Firing Range Floor	12,200ug
MN085 HHC- 121	Indoor Firing Range Wall A	225ug
MN087 HHC- 121	Scout Bay Floor	Not Detected
MN088 HHC- 121	Mortar Bay Floor	43ug

6. Asbestos

a) Laboratory findings show that there were no asbestos in the pipe insulation or range room samples.

The results are illustrated in the chart below.

Sample Number	Sample Location	Laboratory Results
MN082 HHC- 121	Range Room Wall C	Not Detected
MN086 HHC- 121	Drill Hall Pipe Insulation	Not Detected

7. Illumination

Location	Number of Fixtures/ Lights per Fixture	Number of burned out tubes	Illumination Foot Candles (FC)
Boiler Room	6 Fixture, 1 each		10.6-31.6

BN XO	6 Fixture, 2 each	1 Fixture out	10.4-52.2
CSM Office	2 Fixtures, 3 each		44.7-94.1
R& R NCOIC	2 Fixtures, 3 each		52.6-104.5
S1 Officer	2 Fixtures, 3 each	2 Bulbs out	
BN Pac	7 Fixtures, 3 each	4 Bulbs out	29.5-68.5
Workout Area	16 Fixture, 1 each		13.5-18.1
Utility (mop) Room	4 Fixture, 2 each		23.6-32.2
BN CMD	4 Fixture, 3 each		49.3-68.3
Distribution Room	2 Fixture, 2 each		7.4-20.8
Conference Room	6 Fixture, 3 each	2 Bulbs out	27.6-50.4
Echo Supply Room	16 Fixture, 1 each		3.9-12.9
Echo Supply Office	2 Fixture, 3 each	1 Fixture out	36.5-50.8
Vault	2 Fixture, 1 each		12.9-24.3
Scout Bay	4 Fixture, 1 each		7.9-11.5
Kitchen	6 Fixture, 3 each		111.3-154.2
Latrine	7 Fixture, 2 each		6.6-42.6
Drill Hall	28 Fixture, 1 each	4 Fixtures out	.9-4.5
Mortar Bay	2 Fixture, 2 each		24.3-40.6
GSDF	4 Fixture, 3 each		17.8-108.9
MEDIC	4 Fixture, 3 each		55.5-114.6
RSP	4 Fixture, 3 each	4 Bulbs out	24.9-52.5
HHC Supply Room	24 Fixture, 1 each	1 Bulbs out	4.0-22.1
BN OPS NCOIC	2 Fixture, 2 each		19.2-35.7

According to the IES Lighting Handbook, Volume 1995, working spaces where visual tasks are conducted should have a range of illumination between 20- 50 FC. Illumination in areas where visits are temporary should range from 5- 10 FC.

8. Discussions.

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Main Building

- a) Efflorescence was seen in numerous amounts in the Indoor Firing Range in the basement. Efflorescence occurs when water soluble salt minerals seep from cement. Water moving through the material to carry the salts to the surface. The water evaporates and leaves the white powder behind.
- b) Due to the leaks in the building mold is apparent on the walls in the facility. Until the roof is repaired mold will continue to reappear on the walls. Also the holes in the roof are contributing to the damages to the ceiling tile.
- c) Sewage backed up into the latrines. While surveying the area workers were diligently trying to fix the issue.
- d) Mold was found on the air conditioning units that were checked. Soldiers stated mold is growing in all air conditioning units.
- e) Rooms that are normally used as storage are being used to house various soldier activities. These rooms do not have ventilation.

- f) The boiler room has rusty pipes, due to the high humidity in the room. The pipeline insulation throughout the facility has obvious water damage.
- g) Soldiers stated the water fountain leaked when plugged in because of this it is not currently in use.
- h) Light fixtures should be fixed and bulbs replaced to illuminate the facility better. Continue with the plan to fix lights in the drill hall when scissor lift arrives.
- i) Material Safety Data Sheets (MSDS) were in binders with chemical inventory list. MSDS should be located near hazardous material.

FMS Building Temporary Building

- a) Mold was found in the latrine.
- b) Mold growing on the walls because of water damage.
- c) Ceiling tiles has apparent water damage.
- d) Water was not readily available throughout the FMS facility other than the latrine.
- e) Exhaust fan need to be clean.
- f) Exposed pipes were found in the facility.
- g) Eyewash stations need to be replaced. Shower station was not present.
- h) One fire extinguisher was present but had not been checked since 2008.
- i) Flammable cabinets were not organize and did not have appropriate labeling to inform other what it is housing.
- j) Safety signs were seen posted on the wall in the facility.

9. Recommendations.

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Main Building

- a) Repair all leaks in the roof and replace all ceiling tiles that have obvious watermarks. Replace all missing ceiling tiles.
- b) Place a sign on the outside of the Indoor Firing Range door indicating the presence of lead. Do not take anything out or into the range. All items inside must be either cleaned of lead or disposed according NG PAM 420-15, before removal.
- c) Mold in the air conditioning units and on the walls should be removed IAW TG 277 & TG 278.
- d) Replace all pipeline insulation that has water damage and those exposing pipe.
- e) Storage Rooms that do not have ventilation are being used to house various soldier activities. Find other rooms for these soldiers to work in.
- f) Replace all burned out and missing light fixtures and covers.
- g) Make duplicate MSDS binders and place in areas hazardous chemicals are stored.

NATFIONALICISARD BUREAU REGIONAL INDUSTRIAL HYGIENE OFFICE AIRPORT PLAZA SUITE 1530 510 PLAZA DRIVE COLLEGE PARK, GA 30349

FMS Building Temporary Building

- a) Remove mold in building IAW TG 277 & TG 278.
- b) Repair leaks in the roof and then replace all water stained ceiling tiles.
- c) Clean all exhaust fans in building.
- d) Insulate all exposed pipes in building.
- e) Eyewash station should be replaced with a more efficient station. Also a shower station should be present in the facility.
- f) There should be multiple fire extinguishers in the facility and they should be inspected regularly.
- g) Flammable cabinets should be organized and signs and labels should be posted.
- If additional information is needed in regards to the above report, please contact SSGNOn-Responsive Industrial Hygiene Technician, at (404) 242-3418 or Non-Responsive Regional Industrial Hygienist, NGB-CSG-P, COMMERICAL (404) 559-4174.



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CF: State Safety Office, GA, ATTN: LTC Non-Responsive Safety and Occupational Health Manager, 1388 1st Street, Building 840, Dobbins ARB, GA 30069.

Georgia Department of Defense, ATTN: MAJ. Non-Responsive State Construction and Facility Manager, Building 70, 1000 Halsey Ave, Marietta, GA 30062.

1SG^{Non-Responsive}Shop Supervisor, Downtown (Temporary) Field Maintenance Shop, 95 Maynard St. Winder, GA 30680.



FOIA Requested Record #J-15-0085 (GA) Released by National Guard Bureau Page 320 of 378





FMS Building











ANALYTICAL ENVIRONMENTAL SERVICES, INC.

Bulk Sample Summary Report



Client Name: National Guard Bureau Region-South IH AES Job Number: 1202G66 Project Name: HHC - 1-121 Project Number: HHC Client ID AES ID Location sbestos Mineral Percentage Comments СН CR AM AN TR AC 1202G66-MN 082 HHC 1-121 ND ND ND ND ND ND Paint included as binder 001A Layer: 1 1202G66-MN 086 HHC 1-121 ND ND ND ND ND ND Paint included as binder 002A Layer: 1

Note: CH=chrysotile, AM=amosite, CR=crocidolite, AC=actinolite, TR=tremolite, AN=anthophylite

For comments on the samples, see the individual analysis sheets.

ND = None Detected

PLM is not consistently reliable in detecting small concentrations of asbestos in floor tiles and similar nonfriable materials. Quantitative TEM is currently the only method that can be used to determine the conclusive asbestos content.

It is certified by the signatures below that the laboratory identified is accredited by the National Institute of Standards and Technology for Polarized Light Microscopy (PLM) analysis under the EPA Interim Asbestos Bulk Sample Quality Assurance Program, Laboratory ID 102082-0. All percentages given are by visually estimated volume. All analyses are performed in accordance with the EPA "Method for the Determination of Asbestos in Bulk Building Materials. EPA/600/R-93/116, July 1993." This report must not be reproduced except in full without the approval of Analytical Environmental Service. Inc. These test results apply only to the samples actually tested.

Microanalyst:



QC Analyst;

Non-Responsive

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FOIA Requested Record #J-15-0085 (GA) Released by National Guard Bureau Page 323 of 378

Analytical Environmental Services, Inc

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Lab Order:	1202G75
Client:	National Guard Bureau Region-South IH
Project:	HHC 1-121
Matrix:	Wipe
Date Received:	2/20/2012 10:10:00 AM

Date: 24-Feb-12

LEAD ON WIPES (N9100/7082)

N7082

Laboratory ID 1202G75-001A	Client Sample ID	Result	Units	Reporting Limit	DF	Qual	Date Collected	Date	Analyst		
1202070-001A	MN 080 HHC 1-121	BRL	ug, Total	20				Analyzed			
1202G75-002A	MN 081 HHC 1-121		2		E		02/16/2012	02/22/2012	BB		
1202G75-003A		BRL	ug, Total	20	1		02/16/2012	02/22/2012	BB		
	MN 083 HHC 1-121	BRL	ug, Total	20	1		02/16/2012				
1202G75-004A	MN 084 HHC 1-121	12200	ug, Total	240	•		02/10/2012	02/22/2012	BB		
1202G75-005A	MN 085 HHC 1-121		ug, Total	369	18.44		02/16/2012	02/22/2012	BB		
		225	ug, Total	20	1		02/16/2012	02/22/2012			
1202G75-006A	MN 087 HHC 1-121	BRL	ug, Total	20			_	02/22/2012	BB		
1202G75-007A	MN 088 HHC 1-121	••	0.	20	1		02/16/2012	02/22/2012	BB		
1202G75-008A		43	ug, Total	20	1		02/16/2012	02/22/2012	BB		
1202G75-008A	MN 089 HHC 1-121	BRL	ug, Total	20					DB		
			-2, . 0141	20	1		02/16/2012	02/22/2012	BB		

Qualifiers

BRL - Not Detected at the Reporting Limit

B - Analyte detected in the associated Method Blank Results are blank corrected where applicable

> FOIA Requested Record #**395-608** (GA) Released by National Guard Bureau Page 324 of 378

NATIONAL GUARD REGION SOUTH INDUSTRIAL HYGIENE OFFICE 510 PLAZA DRIVE, SUITE 1530 COLLEGE PARK, GA 30349

NGB-AVN-SI

17 March 2003

MEMORANDUM FOR THE: Georgia Army National Guard, ATTN: MAJ Non-Responsive Armory Supervisor, 1st Battalion (Mech) 121st Infantry, 95 Lee and Maynard, Winder, Georgia 30680.

SUBJECT: Industrial Hygiene Service Contract for the Georgia Army National Guard, to look at the Winder National Guard Armory.

1. References.

a. Report dated 25 January 2003, Industrial Hygiene Survey, Non-Responsive

b. OSHA Standards 29 CFR (Code of Federal Regulations), General Industry, revised 1996 rev.

c. AR 40-5, Preventive Medicine, 15 October 1990.

d. AR 11-34, 15 February 1990, The Army Respiratory Protection Program.

e. AR 385-10, 23 May 1988, Army Safety Program.

f. Department of the Army Pamphlet (DA PAM) 40-501, 27 August 1991, Hearing Conservation.

g. TB MED 503, The Army Industrial Hygiene Program.

h. Title 29 Code of Federal regulation (CFR), 1989 rev, Part 1910.94 (c) (6) Table G-10, Ventilation.

i. Industrial Ventilation, 22nd, 1995, American Conference of Governmental Industrial Hygienist, Cincinnati, Ohio.

j. IES Lighting Handbook, Application Volume, 1981, Illumination Engineering Society of North America.

2. General.

a. At the request of MS. Non-Responsive of the Georgia State Safety and Occupational Health Office, an Industrial Hygiene Service Contract was put together to conduct an Industrial Hygiene survey at the Winder Armory in Winder, GA.

b. Dr. Non-Responsive conducted the survey.

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3. Findings. All HHIM field survey forms and survey findings of the report are enclosed. (See ENCL. 1)

4. Recommendations.

a. Follow all recommendations made in reference 1. a. requesting industrial hygiene (IH) services where needed to complete the recommendations.

b. Close this deactivated Indoor firing range until properly decontaminated. Clean the lead hot spots (see sample results) in the Indoor Firing Range following NG PAM's 385-15 and 385-16. Keep in mind that EPA and your state may have lead reduction levels lower than the levels recommend in the 385-15 and 385-16. Clean any and all items stored in the range before removing them.

c. Request the Facility Maintenance Office (FMO) repair leaks and replace all water damaged items in the Armory. Ignoring this problem could lead to Indoor Air Quality and mold problems.

d. Understand that the bulk sample taken from the distribution (copier) room ceiling junction of the old and new building did not contain Asbestos.

e. Use the report to help in correcting all deficiencies noted by the contractor.

f. Request follow-up sampling to be conducted as soon as possible once IFR has been decontaminated. Also consider additional Industrial Hygiene services to monitor operations that were not looked at or surveyed during the contract visit, especially if this will help eliminate health hazards and reduce medical surveillance cost.

g. Contact the Occupational Health Nurse, Ms. Patricia Ferguson, for any medical Surveillance that may be needed.

h. To execute your responsibilities in correcting all deficiencies, coordinate with the FMO the Occupational Health Nurse and the Occupational Safety and Health Office for technical guidance.

5. If additional information is needed about the contractors report, please contact Non-Responsive Regional Industrial Hygienist, ARNG-IHS, 1-800-362-0262 OR COMMERCIAL (404) 559-41/74.



Regional Industrial Hygienist

CF: NBG-AVN-SH

CF: State Safety Office, GA, ATTN: Mrs. Non-Responsive Occupational Health Manager, 5019 Highway 42, Ellenwood, GA 30294.

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CF: State Safety Office, GA, ATTN: Safety and Occupational Health Manager, P.O. 5019 Highway 42, Ellenwood, GA 30294.

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Non-Responsive 583 GINGER CAKE RD FAYETTTEVILLE, GA 30214 (770) 461-2684

January 25, 2003

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Maj Non-Responsive

GA Army National Guard Armory 95 Lee & Maynard Winder, GA 30680

RE: Baseline Industrial Hygiene Survey

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FOIA Requested Record #J-15-0085 (GA) Released by National Guard Bureau Page 332 of 378

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FINAL REPORT

FOR

BASELINE INDUSTRIAL HYGIENE SURVEY

GEORGIA ARMY NATIONAL GUARD

WINDER ARMORY

WINDER, GA

DATE:

DECEMBER 20,2002

PREPARED BY

Non-Responsive

583 GINGER CAKE RD FAYETTEVILLE, GA 30214 (770) 461-2684

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CONTENTS

1.0 INTRODUCTION

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2.0 INSTRUMENTATION

3.0 FINDINGS

4.0 **REFERENCES**

Attachment 1 HHIM Forms

- Attachment 2 Laboratory Reports: Deactivated Indoor Firing Range
- Attachment 3 Laboratory Reports: Air Condition System
- Attachment 4 Photographs of Facility
- Attachment 5 Schematic Drawing of Facility

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1.0 INTRODUCTION

At the request of the National Guard Bureau South Region Industrial Hygiene Office, Non-Responsive performed a Baseline Industrial Hygiene Survey at the GA ARNG Winder Armory. The purpose of the survey was to perform a baseline survey to evaluate health hazards, controls present in the work site, collect lead swipe samples from renovated/inactive or closed Indoor Firing Ranges and perform, illumination survey. And to make recommendations regarding health hazards associated with the work at the Winder Armory.

The building was finished in 1955. The facility houses the 1st Battalion (Mech) 121st Infantry. The armory is used by the troops of the 1st Battalion (Mech) 121st Infantry for their monthly weekend drills.

The 1st Battalion (Mech) 121st Infantry with about 230 troops has 11 full time AGR personnel at the time of the survey. The AGR employees are assigned to perform administrative duties Tuesday-Friday 7:00am-5: 30pm. The facility houses administrative areas, a Drill Hall, a Classroom, a Supply Room, a Weapons Vault, a kitchen, and a deactivated Indoor Firing Range that was converted to a computerized (simulating) range. A schematic drawing of the facility can be found in Attachment 5.

The facility was visually examined and personnel consulted to assess potential hazards present. Employees are concerned that roof leaks in various in various offices throughout the building be a health hazard due to mold formation. Employees reported roof leaks in the Supply Room, Training NCO Office, weight room and the Commanders Office (weekend drill use). In this office, the floor floods every time it rains. The day of the survey, there was water on the floor, which squeezed out as you step on the floor. Health Hazard Information Modules were completed. Illumination survey was performed throughout the facility.

2.0 INSTRUMENTATION/CALIBRATION

The following instrumentation was used to obtain air sampling data and ventilation measurements. All instrumentation was calibrated before and after sampling and all instrumentation was operated according to the manufacturer's recommendations:

Sper Scientific Light Meter

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FOIA Requested Record #J-15-0085 (GA) Released by National Guard Bureau Page 338 of 378 • •

3.0 FINDINGS

Illumination

Illumination levels were recorded in administration offices, conference room, drill hall, and supply room. Light measurements were below IES guidelines at the Operations NCO office (46 FC) and the Distribution Room Office. The other areas tested were within IES minimum standards. See Light Readings Table at the end of this section.

Administration

Personnel perform administrative duties that consist of reading, handling and generating paper work. Computer use comprises a large portion of the working day, two to six hours per day. This continuous use of computers can, in the long run, lead to eye strain and hand/wrist or shoulder soreness. Some of the personnel reported they have experienced either eye strain or shoulder soreness from the use of computers for long periods of time. (See HHIM forms in attachment 1).

Motor Pool

The motor pool is located in a fenced area in the rear of the building. The motor pool includes 2.5T trucks, 5T trucks, 10 T trucks, BFV (1), and mortar trac. Vehicle. PMCS performed at the armory. No repair services are performed on these vehicles at the armory. When repairs are needed, vehicles are taken to the OMS #8 to perform the repairs to the armory vehicles.

Drill Hall

The Drill Hall is located in the center of the building. It is used for formation and training during weekend drills. The Drill Hall is used to clean weapons about two times a year. Bay door is kept open and the exhaust ventilation fan at roof close to bay door is turned on when the weapons are cleaned. The troops are divided in smaller groups of about 30 or 40 people at a time. The Drill Hall is also used for High School events and community functions.

Boiler Room

The Boiler Room was renovated when the building was enlarged in 1993. The present boiler is an all metal one. Personnel said that the wrapping was replaced with fiberglass.

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Deactivated Indoor Firing Range

A deactivated Indoor Firing Range (IFR) was been converted into a computerized (simulating) range. This room has been designated as an emergency storm shelter. So far only tornado drills have been done. Personnel stated that it was deactivated in 1998 Six There were many rectangular size open containers in front of the backstop (floor) filled with lead pieces (See pictures). Six samples were taken from the IFR. Five of the six samples were above the clearance level of 200ug/ft2. See table 1 for results.

Table 1

Sample Number	Sample Location	Results
81	Bullet backstop	1020000ug
82	Floor in front of backstop	119000ug
83	Item 1, floor midway up	6270ug
84	Item 2 stored metal rail	5540ug
85	Wall floor next to exit door	599ug
86	Blank	BLR

Weapons Vaults

The Winder Armory has a weapon storage vault located in the Supply Room. The weapons list includes M-16s, 9mm pistols, 240 Bravos, and MK19. The dehumidifier is turned on at all times Personnel stated that accountability and issuing of weapons are performed in this area. Weapons are cleaned in the Drill Hall as described on the Drill Hall section. Night vision equipment kept in vault.

A/C System

Central A/C units are used to cool and heat administrative offices and conference room. It is a new system that was installed about 7 or 8 years ago. It is a waterchilled system, which also is used for heating. It uses the radiator grills that are at

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the walls, close to the floor. Six swipe samples for Lead (Table 2) were collected from the supply air grills in the offices occupied by full time members of the Army National Guard. One of the samples was above the clearance level of 200ug/ft2.

Table 2

Sample Number	Sample Location	Results
71	Readiness NCO Office	87ug
72	Conference Room	3610ug
73	Operations Office (SFC Andrews side)	50ug
74	Operations Office (Sgt. Westrip side)	27ug
75	Battalion Personnel Office	77ug
76	Blank	BLR

Roof Water Leak

Employees are concerned that roof leaks in various in various offices throughout the building be a health hazard due to mold formation. Employees reported roof leaks in the Supply Room, Training NCO Office, weight room and the Commanders Office (weekend drill use). In this office, the floor floods every time it rains. The day of the survey, there was water on the floor, which squeezed out as you step on the floor. The roof leaks is a problem that needs to be addressed.

Material Safety Data Sheets

The armory has two MSDS books. One is located in Readiness NCO Office and the other at the shop. MSDS forms are added to the book when new products arrive. There is a Flammable cabinet with a Hazardous Materials Inventory List kept at the door of the cabinet. Updated about a year ago. SFC Non-Response attended Hazardous Materials training on Feb. 2001.

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Light Readings

Light measurements were taken in various locations throughout the facility. The results were compared to guidelines recommended by the Illuminating Engineering Society (IES). The results of the survey are shown in Table 3

Location	Light Reading (footcandles)	IES Recommendation (footcandles)
ADO Readiness NCO Office	58-80 (Avg. 70)	50-100
ADO Operations Office (SFC	32-78 (Avg. 50)	50-100
ADO Operations Office (SFC	46-84 (Avg. 63)	50-100
ADO Operations Office(SFC I	46 67 (Avg. 60)	50-100
ADO Training NCO Office	62 78 (Avg. 69	50-100
Conference Room	72-98 (Avg. 85)	50-100
ADO Operations NCO Office	30-57 (Avg. 46)	50-100
HHC Orderly Room	58-110 (Avg. 76)	50-100
ADO Maintenance Office	144-185 (Avg. 164)	50-100
Distribution Room Office	14-33.(Avg. 22)	50-100
ADO Supply Room (Office)	45-53 (Avg. 49)	50-100
ADO Supply Room (Storage)	13-28 (Avg. 21)	20
Drill Hall	53-233 (Avg. 120)	30

Table 3	i
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Light measurements were below IES guidelines at the Operations NCO office (46 FC) and the Distribution Room Office. Consideration should be given to provide supplemental lighting in those areas that were below the recommended standard. ANSI RP7-1991.

4.REFERENCES

- Guide to Occupational Exposure 2000, American Conference of Governmental Industrial Hygienists (ACGIH), Cincinnati, Ohio.
- American National Standards Institute (ANSI), /Illuminating Engineering Society (IES), Industrial Lighting 1991.

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- National Institute for Occupational Safety and Health (NIOSH), (76-130) Technical Information, Lead Exposure and Design Considerations for Indoor Firing Ranges GPO, 1975.
- Title 29, Code of Federal Regulations (CFR). 1999, revision, Part 1910. Occupational Safety and Health Standards
- AR 40-5, Preventative Medicine, 15 October 1990.
- AR 385-10, The Army Safety Program, 23 May 1988.
- National Safety Council, Fundamentals of Industrial Hygiene, 4th edition, 1996.
- AR 385-16, National Guard Pamphlet, Safety Guidelines for Converting Indoor Firing Ranges to Other uses.
- TB MED 503, The Army Industrial Hygiene Program, February 1985.
- Department of the Army Pamphlet (DA PAM) 40-501,27 August 1991, Hearing Conservation.
- Title 29 CFR, Part 1910.1200, The Hazard Communication Standard.



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RECOMMENDATIONS

- Provide supplemental lighting in those areas that were below the recommended standard as represented in Table 3.
- Recommend that when using computers for extended periods of time, personnel should take occasional breaks and change position to minimize the possibility of eyes and/or hands/wrist injury.
- Continue to ensure that weapon maintenance and cleaning is done in a wellventilated area. Continue to practice good personal hygiene by washing hands after handling and cleaning weapons and ammunition.
- Recommend that the roof should be repaired as soon as possible to stop water leaks at offices and prevent flooding of floors and the formation of mold.
- The MSDS book should be updated periodically. Ensure that personnel have knowledge of the location of the MSDS book, and is enrolled hazardous materials safety training.
- That the state Occupational Safety and Health office review the lead swipe clearance sample results of this facility to determine if the IFR will need further decontamination. This room should not be used until all lead is removed and the area sanitized.

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· PRIVACY ACT STATEMENT

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HEALTH HAZARD INFORMATION MODULE FIELD SURVEY *SEE PRIVACY AST ATA TABLENDON REVERSE. (For use of this form, see FIHIM User's instruction.)

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HEALTH HAZARD INFORMATION MODULE FIELD	SURVEY
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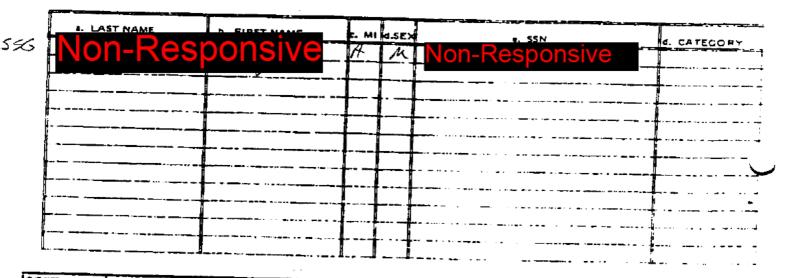
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HEALTH HAZARD INFORMATION MODULE FIELD SURVEY *SEE PRIVACY ACT STATEMENT ON REVERSE. (For use of this form, see further Copy instructions.)

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Tills 6 U.S. Code. Section 301: Executive Order 0397 authorizes the set of your Social Security Number as a identification number. The purpuse of this information is to identify and monitor data relating each DA civilian employee exposed to a heterdous workplace as operation. The use of this information is to provide histories of exposure for any sizen worker.

Disclosure of your Social Security Number is not mendatory; however, nondisclosure-may result in untimely providen of proper medical munitorie;.

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SECTION S. SAMPL

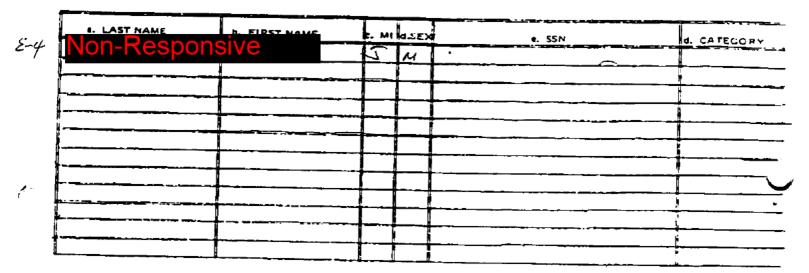
SAMPLING DATA

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a. HAZARD	D. SAMPLE TYPE	C. RESULTS	d, REMARKS
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SECTION 6.

PERSONNEL DATA



SECTION 7. COMMENTS IA dd blank sheet of gaper if a Retartion \mathcal{O} Margas Employee's retent when with about 7-8 h /day; imputer for by plands of time with problem anoriested withing in computers to take bucks. i leekage foron ceiling on floor -Tile missing from water Computer a **(**3) 6X D No live Wat Ceil y / ils

· PRIVACY ALT STATEMENT

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Dischware of your Social Security Number is not mendatory; however, nundisclusure mer result in untimely you issue of proper metical maniforms

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ANALYTICAL ENVIRONMENTAL SERVICES, INC. 3785 Presidential Parkway Atlanta, GA 30340 Tel: (770) 457-8177 Fax: (770) 457-8188 AES Job Number: **B12545** Page 1 of 1 Total Samples Wednesday, January 08, 2003

BULK SAMPLE ANALYSIS

Client Name:	Non-Responsive		
Project Name:	Winder GA Armory	Project Number:	
Client Sample ID:	90	AES Lab ID:	118024
Location:	Distribution (copier)	room ceiling junction of old and new building	

Sample Description: Light brown soft fibrous with paint

ASBESTOS FIB		re visually estimated by volume NON-FIBROUS MATER	
	EKƏ		(IALS
Chrysotile:		Vermiculite:	
Amosite:		Biotite:	
Crocidolite:		Mica:	
Anthophyllite:		Perlite:	
Tremolite:		Aggregates:	
Actinolite:		Styrofoam:	
NON-ASBESTOS F	IBERS	OTHERS	
Synthetics:		Aluminum:	
Mineral Wool:		Bitumen:	
Fiberglass:	•	Resilient Material:	
Cellulose:	95	Glue:	
Animal Hair:		Binders:	5
Antigorite:		L	

COMMENTS: Paint included as binder. No asbestos detected.

It is certified by the signatures below that the laboratory identified is accredited by the National Institute of S tandards and Technology for Polarized Light Microscopy (PLM) analysis under the E PA Interim Asbestos Bulk Sample Quality Assurance Program, Laboratory 102082- 0.

	-,		
Microanalyst:	Non-Responsive	QCAnalyst:	Non-Responsive

All percentages given are by volume visually estimated. A II analyses are performed in accordan ce with the EPA "Method for the Determination of A sbestos in Bulk Bullding Materials, E PA/600/R-93/116, July 1993." This report must not be reproduced except in full with the approval of A nalytical Environmental Services, Inc. These test results apply only to the samples actually tested. The refractive index was determined by using "Rapidly and A ccurately Determining Refractive Indices of A sbestos Fibers by Using Disper sion Staining Method" by S hu-Chun Su, Ph.D.

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Analytical Environmental Servs, Inc.

Date: 1/10/03

TOTAL LEAD IN WIPE SAMPLES N7082

CLIENT: Project: Project No: PO No:	Non-Responsive Winder GA Armory Winder GA Arm				I	Lab Order: Date Received: Matrix: Analyst:	0301094 1/6/03 4:05:00 P Wipe MM
Laboratory ID	Client Sample ID	Results	Units	MDL	DF	Date Collected	Date Analyzed
0301094-001A	71	87.0	μg, Total	2.83	1	12/20/02	1/7/03
0301094-002A	72	3610	μg, Total	8.15	2.88	12/20/02	1/7/03
0301094-003A	73	50.0	µg, Total	2.83	1	12/20/02	1/7/03
0301094-004A	74	27.0	µg, Total	2.83	1	12/20/02	1/7/03
0301094-005A	75	77.0	μg, Total	2.83	1	12/20/02	1/7/03
0301094-006A	76	BRL	μg, Total	2.83	1	12/20/02	1/7/03
0301094-007A	81	1020000	μg, Total	2780	98 L	12/20/02	1/7/03
0301094-008A	82	119000	μg, Total	283	100	12/20/02	1/7/03
0301094-009A	83	6270	μg, Total	10.1	3.56	12/20/02	1/7/03
0301094-010A	84	5540	μg, Total	9.76	3.45	12/20/02	1/7/03
0301094-011A	85	599	µg, Total	2.83	1	12/20/02	1/7/03
0301094-012A	86	65.0	µg, Total	2.83	I	12/20/02	1/7/03

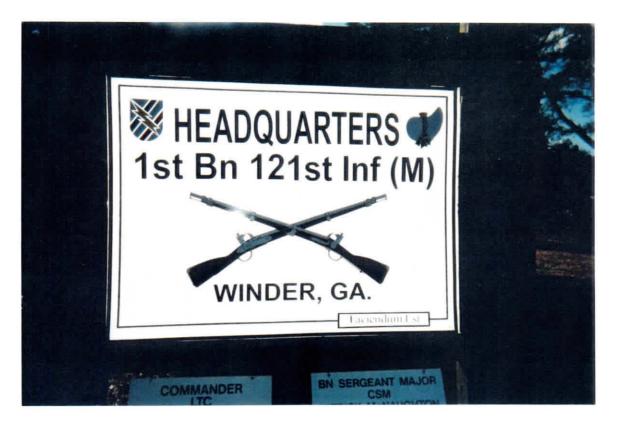
Qualifiers:

MDL - Method Detection Limit ND - Not Detected at the Reporting Limit DF - Dilution Factor

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Winder, GA Armory



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A/C Heating SupplyGrills



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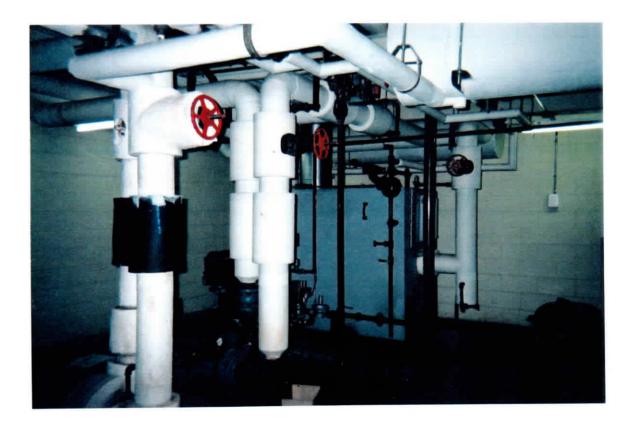
Drill Hall



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Boiler Room



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Motor Pool



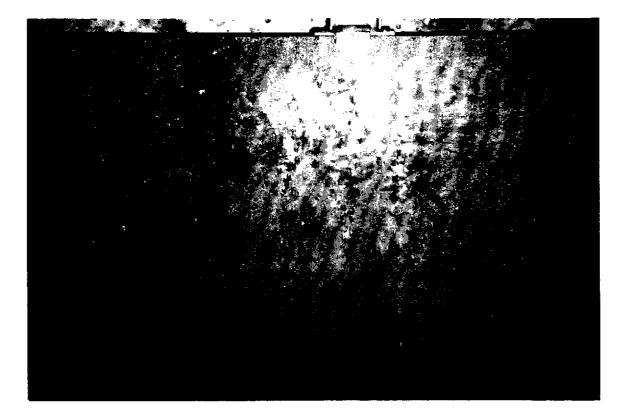
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IFR Lead Fragments

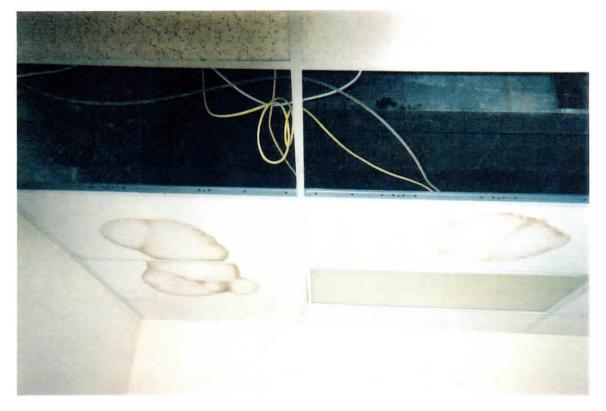


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Bullet Backstop

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Water Leakage Stains Missing Ceiling Tiles



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Water Leakage Floor



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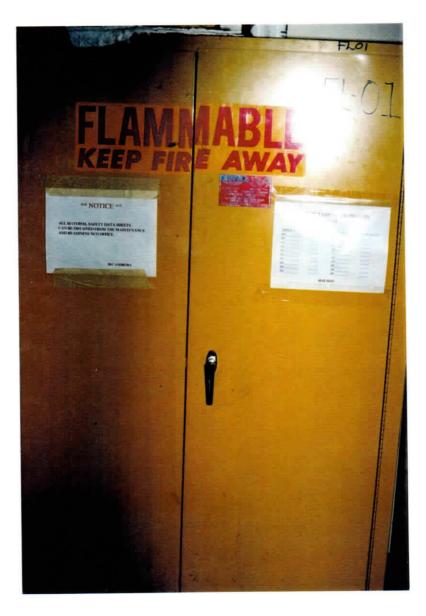


Water Leakage Floor



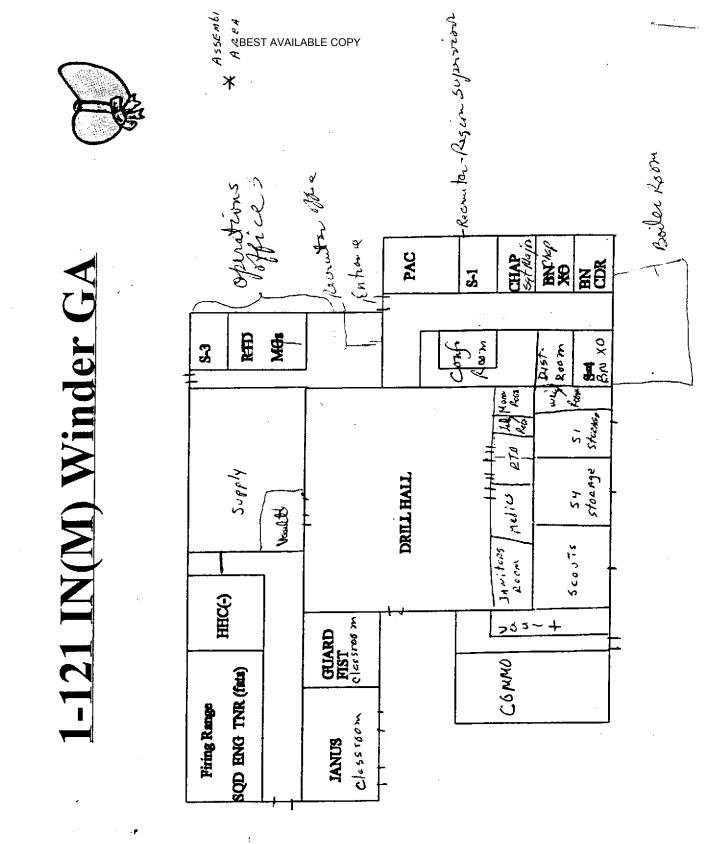
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10. 54



Flammables Cabinet

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