ANT OF CHAPTER OF AUTOMOTOR OF THE STATE OF

NATIONAL GUARD BUREAU

111 SOUTH GEORGE MASON DRIVE ARLINGTON VA 22204-1382

ARNG-CSG-P September 8, 2017

MEMORANDUM FOR: Alaska National Guard Adjutant General

SUBJECT: Industrial Hygiene (IH) Lead Dust Survey for Kotzebue Armory [Facility No.

568514]

PURPOSE

The National Guard Bureau (NGB) Mid-West Regional IH Office assigned Lori Arent and Bruce Hills, Certified Industrial Hygienists (CIHs), to perform annual lead surface wipe sampling at the subject facility to determine if lead contamination was present. The sampling was conducted on July 25, 2017 and the site point of contact was Mr. Steve Smith. This armory was constructed in 1987 and had an indoor firing range (IFR) that has been converted to office space for the Alaska State Troopers.

FINDINGS

1. Measurable lead dust was found in the following samples:

Sample Number	Location	Lead (micrograms/square foot)
K-19	Small bay on table near drill press	22
K-20	Small bay on floor inside storage cage	<u>49</u>
K-21	Large bay on workbench near offices	<u>103</u>
K-30	Old IFR backstop room on encapsulated backstop	<u>315</u>
K-33	Old IFR backstop room on wall near exhaust fan	<u>88</u>
K-35	Old IFR backstop room on floor	<u>2178</u>
K-37	Trooper office on floor	21
K-39	Trooper office on light fixture	<u>790</u>
K-40	Trooper office on top of locker #7	<u>57</u>
K-41	Trooper office on top of locker #6	36

- 2. Seven of the ten detectable lead results were above the 40 micrograms per square foot limit recommended by the EPA for facilities occupied by the public. All of the high results were from the old IFR and the maintenance bays. Lead levels above the limit are most likely due to migration from the old IFR and/or handling of contaminated weapons, equipment, and clothing. Regular housekeeping where all horizontal surfaces are cleaned will keep lead levels below 40 and prevent contamination of other areas.
- 3. In the Trooper office area of the old IFR, the soundproofing, electrical, and mechanical fixtures from the old range remain in the space (see attached photos). A wall was added to partition the Trooper offices from the old IFR backstop room. The wall is not sealed at the top; there is a gap of approximately 4 to 6 inches at the top of the wall. The old IFR backstop room was locked and the lock had to be drilled for access to the room. A note was posted on the backstop stating that the backstop had been cleaned and encapsulated in August 1994. The metal backstop, a metal ceiling baffle, the range exhaust fan (inoperable according to the site contact), and electrical fixtures remain in the old backstop room.
- 4. The sample results show that there is some lead contamination above the limits on elevated surfaces in the Trooper office area (on a light fixture and on top of a locker). There are also high lead levels in the old IFR backstop room (wall near exhaust fan and floor) and the results show that the encapsulant on the backstop has failed. The maintenance bays also tested high for lead (small bay storage cage floor and large bay workbench).

RECOMMENDATIONS

- 1. Convert the old IFR in accordance with NG PAM 420-15. The old IFR range components must be removed and the area cleaned and encapsulated for the range to be fully converted and classified as closed. An option for the backstop room is to leave the old IFR components in place (fan, baffle, and backstop), permanently abandon and seal the space, and seal the gap at the top of the wall shared with the Trooper office space.
- 2. Once the old IFR conversion is completed, contact Randy Fritz at the number below to schedule lead clearance sampling.
- 3. Clean the horizontal surface in the work bays using wet methods or a high-efficiency particulate air (HEPA) filter vacuum.

The attached laboratory report will provide the results and locations of the samples collected within this facility. For any further questions, please contact Randy Fritz at randy.c.fritz.civ@mail.mil or 303 210-8722.

Randy C. Fritz, DM, MS

National Guard Bureau

Randy C. Frit

Regional Industrial Hygienist

PSC-FOH ENVIRONMENTAL LABORATORY

536 S. CLARK STREET CHICAGO, IL 60605 PHONE: (312) 886-0413 FAX: (312) 886-0434

ANALYTICAL REPORT

Submitted To: ARNG - Region Midwest IH Office

2824 Fairview Pt Rd STE IH Edgewood, MD 21040

Attention: COL Randy Fritz/Ms. Lori Arent, CIH

Submitted By: Ms. Michelle C. Stemmons

Reference Data: Lead

Sampling Site: NGB: Kotzebue, AK (Armory)

Sample Media: Ghost Wipe(s)® Method Reference: OSHA ID-121 Project ID: Project 16106

DFOH Lab Nos.: TM-17-133447 through TM-17-133490

Date Received: 07/31/17

Data Analyzed: 08/07/17 - 08/17/17

Date Issued: 08/23/17

The wipe samples were hot plate digested. The samples were run on a Perkin Elmer flame atomic absorption spectrophotometer (AA).

General Lab Comments:

All quality control criteria have been met.

- * All samples received in condition acceptable for analysis unless otherwise noted.
- ** Sample results have not been corrected for contamination based on the field blank or other analytical blank unless otherwise noted.

Analytical results are given on the enclosed tables. Results relate only to items tested. If you have any questions about these results, feel free to phone the Laboratory at (312) 886-0413.

Ms. Edna A. Bautista Technical Manager Ms. Michelle C. Stemmons Laboratory Director



Project 16106 Page 1 of 3





PSC-FOH ENVIRONMENTAL LABORATORY

536 S. CLARK STREET CHICAGO, IL 60605 PHONE: (312) 886-0413 FAX: (312) 886-0434

LEAD on WIPE RESULTS

SAMPLE NUMBER*	LABORATORY NUMBER	CONCENTRATION (µg)	CONCENTRATION (µg/ft²)
K-1	TM-17-133447	(µg) <5.0	(μ g/it) <5.0
K-2	TM-17-133447	<5.0	<5.0
K-2 K-3	TM-17-133446	<5.0	<5.0
K-4	TM-17-133449	<5.0 <5.0	<5.0
K-5	TM-17-133451	<5.0	<5.0
K-6	TM-17-133452	<5.0	<5.0
K-7	TM-17-133453	<5.0	<5.0
K-8	TM-17-133454	<5.0	<5.0
K-9	TM-17-133455	<5.0	<5.0
K-10	TM-17-133456	<5.0	<5.0
K-11	TM-17-133457	<5.0	<5.0
K-12	TM-17-133458	<5.0	<5.0
K-13	TM-17-133459	<5.0	<5.0
K-14	TM-17-133460	<5.0	<5.0
K-15	TM-17-133461	<5.0	<5.0
K-16	TM-17-133462	<5.0	<5.0
K-17	TM-17-133463	<5.0	<5.0
K-18	TM-17-133464	<5.0	<5.0
K-19	TM-17-133465	22	22
K-20	TM-17-133466	49	49
K-21	TM-17-133467	103	103
K-22	TM-17-133468	<5.0	<5.0
K-23	TM-17-133469	<5.0	<5.0
K-24	TM-17-133470	<5.0	<5.0
K-25	TM-17-133471	<5.0	<5.0
K-26	TM-17-133472	<5.0	<5.0
K-27	TM-17-133473	<5.0	<5.0
K-28	TM-17-133474	<5.0	<5.0
K-29	TM-17-133474	<5.0	<5.0
K-30	TM-17-133476	315	315
K-31	TM-17-133477	<5.0	<5.0
K-32	TM-17-133477	<5.0	<5.0
K-33	TM-17-133476	88	88
K-34		<5.0	<5.0
	TM-17-133480		
K-35	TM-17-133481	2178	2178
K-36	TM-17-133482	<5.0	<5.0
K-37	TM-17-133483	21	21
K-38	TM-17-133484	<5.0	<5.0
K-39	TM-17-133485	790	790
K-40	TM-17-133486	57	57
K-41	TM-17-133487	36	36
K-42**	TM-17-133488	<5.0	
K-43**	TM-17-133489	<5.0	
K-44**	TM-17-133490	<5.0	



Project 16106 Page 2 of 3

PSC-FOH ENVIRONMENTAL LABORATORY

536 S. CLARK STREET CHICAGO, IL 60605 PHONE: (312) 886-0413 FAX: (312) 886-0434

Surface Wipe Sampling Criteria

Metal	Acceptable Surface Level μg/ft ²	Basis for Criteria
Lead	200 for facilities (all surfaces)	NG Pam 420-15, Guidelines and Procedures for Rehabilitation and Conversion of Indoor Firing Ranges, 3 November 2006, http://www.ngbpdc.ngb.army.mil/pubs/420/ngpam420_15.pdf
Lead	40 for any potentially child occupied areas of facility (all surfaces); used for armories with public access, family services offices, or other routine use	NG Pam 420-15, Guidelines and Procedures for Rehabilitation and Conversion of Indoor Firing Ranges, 3 November 2006, http://www.ngbpdc.ngb.army.mil/pubs/420/ngpam420 15.pdf

Metals in Wipe Limits (based on one ft² sampled area)

Analyte	Analytical Method	Method Detection Limit	Minimum Reporting Limit
Lead	OSHA ID-121	2.5 μg/ft ²	5.0 μg/ft ²

Ms. Edna A. Bautista Technical Manager



Project 16106 Page 3 of 3

US PUBLIC HEALTH SERVICE, FEDERAL OCCUPATIONAL HEALTH CHAIN-OF-CUSTODY / FIELD DATA SHEET

10 10 10 10 10 10 10 10	Environmental Laboratory		PROJ	PROJECT REFERENCE		For Lab Use Only	11	Conditions on Receipt with Name & Date	2 ,
200	See S. Clark Street South, Suite 714 Chicago, IL 60605-1521		Agreement No.:	A 106644		Project /Report #	10	00	367
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COMMENTS:

* Applied to organic and inorganic analysis in cases of an emergency only.

* Applied to inorganic and inorganic analysis in cases of an emergency only.

* Applied to organic and inorganic samples 7-10 business days.

US PUBLIC HEALTH SERVICE, FEDERAL OCCUPATIONAL HEALTH CHAIN-OF-CUSTODY / FIELD DATA SHEET

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Chicago, IL 60605-1521		No.:	1	Due Date:			
Tel: (312)-886-0413 Fax: (312)-886-0434	434	Statement	S 188318	Samples Recei	ved Chille	d? YES NO (circle one)	Rev. 07/2010
Attn: Michelle Stemmons		of Work No.:		Water Sample Codes		Turn Around Time Codes	Analysis Requested
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		Agency	NAME	Preservatives:			
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12-12		Classroom 169 on floor	169			TM-17-133458	
K-13		Drill Floor	7007			TM-17-133459	
K-14		Drill Floor on table	1065			TM-17-133460	
X-15		Jail on table	table			TM-17-133461	
K-16		State Trooper Office on desk	State Trooper Man			TM-17-133462	
K-17		Trooper Break Room on table	Break			TM-17-133463	
14-18		Trooper Break Room on Floor	Break	0		TM-17-133464	
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US PUBLIC HEALTH SERVICE, FEDERAL OCCUPATIONAL HEALTH CHAIN-OF-CUSTODY / FIELD DATA SHEET

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K-24		11			TM-17-133470	
K-25		=			TM-17-133471	
K-26		-			TM-17-133472	
K-27		77			TM-17-133473	
K-28		11			TM-17-133474	
14-29		=			TM-17-133475	
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US PUBLIC HEALTH SERVICE, FEDERAL OCCUPATIONAL HEALTH CHAIN-OF-CUSTODY / FIELD DATA SHEET

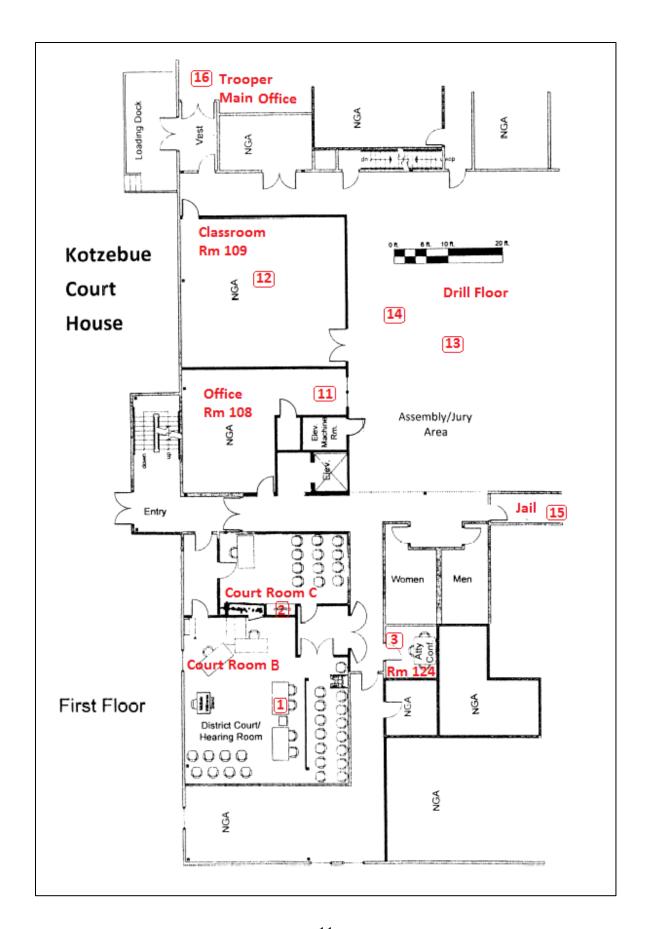
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No. Column Colu	Name: Lori Arent		No:		d	Plastic, G-Glass, V-VOC	+	ee Day Rush	
	Address: 3505 Fernwood Dr.		Agency	ARNG	Prese	rvatives:			
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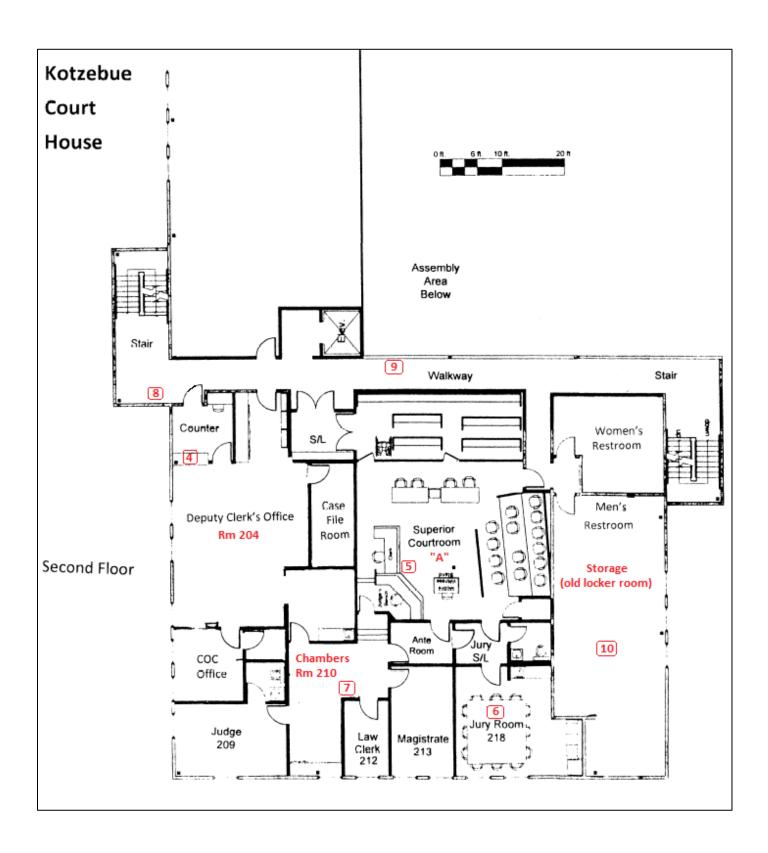
Demonstrates. SD: Applied to organic analysis in cases of an emergency only. Applied to inorganic and organic samples, SD: Applied to organic and inorganic samples 7-10 business days.

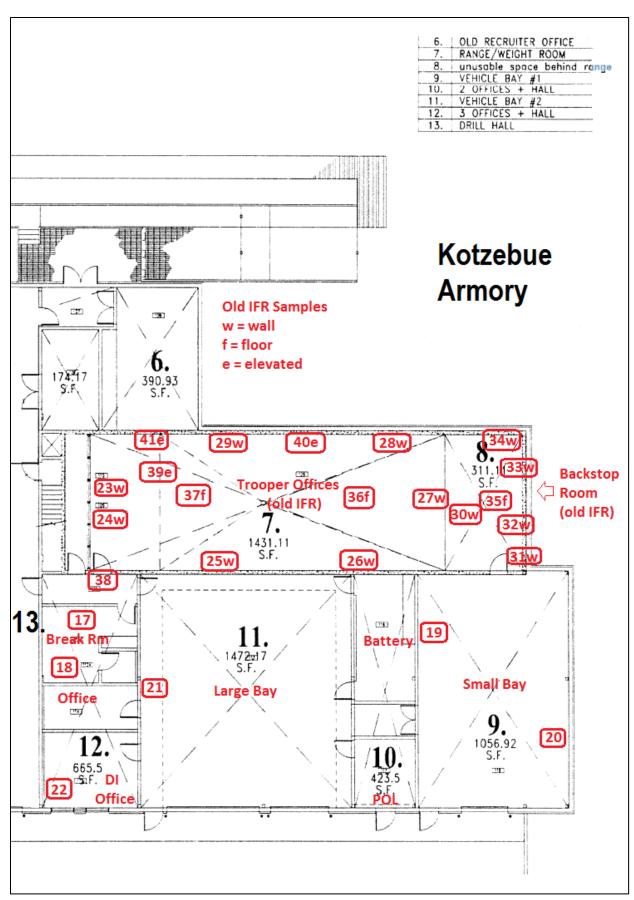
SDFS read US PUBLIC HEALTH SERVICE, FEDERAL OCCUPATIONAL HEALTH CHAIN-OF-CUSTODY / FIELD DATA SHEET Conditions on Receipt with Name & Date TM-17-133490 TM-17-133489 TM-17-133487 TM-17-133488 Lab ID # The trad STD- Standard 3D- Three Day Rush® For Lab Use Only
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Due Date Secenced Chilled? YES NO
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P-Plastic, G-Glass, V-VOC
Preservatives: Code Volume Area Volume C (Liters) 7/25/17 A-None, B-H₂SO₄, C-HNO₂, D-NaOH 0: 1 Time (Min.) Flow (LPM) AK How arent Armory Kot Zebue ARNG Sample Location / Description PROJECT REFERENCE P 188319 Trooper Offices S 188318 A 106644 on locker Sample Media Codes*
1-Charcoal 2-Matchad Weight, 0.8 um
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5-Ghost Wipes** 6. Passive badge
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(City, State): Blank 7/25/17 5 1 Environmental Laboratory 536 S. Clark Street South, Suite 714 Chicago, L. 60805-1621 Tel: (312)-886-0413 Fax: (312)-886-0434 Attn: Michelle Stemmons Sample Type Codes | 1-Air 2-Water 3-Paint 4-Soil 5-Dust 6-Bulk 7-Wipe 8 - Other Ijarent1@gmail.com Contact Information
Name: Lori Arent
Address: 3505 Fernwood Dr. Raleigh, NC 27612 7-44 16-43 Phone/Fax: 919-247-0883 # 01 K-42 スノチー

COMMENTS:
- Applied to organic analysis in cases of an emergency only. [©] Applied to inorganic and organic samples, SD: Applied to organic and inorganic samples 7-10 business days.

10







Old IFR - Trooper Offices



Entry door showing mechanical/electrical, equipment and sound-proofing from old IFR.



Office area looking toward partition wall and fitness area.



Close up view of sound proofing and adhesive on ceiling above fitness area.



Partition wall showing gap at top of wall and mechanical/electrical equipment.

Old IFR - Backstop Room





Entry door to backstop room.

Backstop and exhaust fan.



View above backstop showing baffle and partition wall with gap above.



Sample K-35 on floor.