



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4  
ATLANTA FEDERAL CENTER  
61 FORSYTH STREET  
ATLANTA, GEORGIA 30303-8960

APR 29 2010

Certified Mail – Return Receipt Requested

Mrs. Irene Agapion-Palamaris  
ARCO Realty Company  
625 South Elm Street  
Greensboro, North Carolina 27406

Re: ARCO Realty Company; Docket No. TSCA-04-2010-2702(b)

Dear Mrs. Palamaris:

Enclosed is a copy of the ratified Consent Agreement and Final Order (CAFO) in the above-referenced matter. The original CAFO has been filed with the Regional Hearing Clerk and served on the parties as directed in Section 22.6 of the Consolidated Rules of Practice, 40 C.F.R. Part 22.

As stated in Section V of the CAFO, the assessed penalty of \$1,100.00 is due within 30 days from the effective date. Please ensure that the face of your cashier's or certified check includes the name of the company and the docket number of this case. Penalty payment questions should be directed to Ms. Lori Weidner either by telephone at (513) 487-2125 or by written correspondence to her attention at U.S. Environmental Protection Agency (EPA), Cincinnati Accounting Operations address identified in the CAFO. Should you have any questions about this matter or their compliance status in the future, please call me at (404) 562-8979 or Mr. Kevin L. Woodruff at (404) 562-8828.

Also enclosed is a copy of the October 2001 *Enforcement Alert* titled "U.S. EPA Notifying Defendants of Securities and Exchange Commission's Environmental Disclosure Requirements." This document puts your client on notice of their potential duty to disclose to the Securities and Exchange Commission any environmental enforcement actions taken by EPA. Please note that the contact phone number on page three of the Notice has been changed to (202) 551-3115.

Sincerely,

A handwritten signature in black ink, appearing to read "Jeanne M. Gettle".

Jeanne M. Gettle  
Chief  
Pesticides and Toxic  
Substances Branch

Internet Address (URL) • <http://www.epa.gov>

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UNITED STATES  
ENVIRONMENTAL PROTECTION AGENCY  
ATLANTA, GEORGIA

2010 APR 29 PM 12:13  
RECEIVED  
EPA REGION 4

In the Matter of: )  
ARCO Realty Company )  
Respondent. )  
\_\_\_\_\_ )

Docket No. TSCA-04-2010-2702(b)

**CONSENT AGREEMENT AND FINAL ORDER**

**I. Nature of the Action**

1. This is a civil penalty proceeding pursuant to Section 16(a) of the Toxic Substances Control Act (TSCA), 15 U.S.C. § 2615(a), and pursuant to the Consolidated Rules of Practice Governing Administrative Assessment of Civil Penalties and the Revocation/Termination or Suspension of Permits (Consolidated Rules), 40 C.F.R. Part 22. Complainant is the Director of the Air, Pesticides, and Toxics Management Division, United States Environmental Protection Agency, Region 4 (EPA). Respondent is ARCO Realty Company.
2. Complainant and Respondent have conferred for the purpose of settlement pursuant to 40 C.F.R. § 22.18, and desire to resolve this matter and settle the allegations described herein without a formal hearing. Therefore, without the taking of any evidence or testimony, the making of any argument, or the adjudication of any issue in this matter, and in accordance with 40 C.F.R. § 22.13(b), this Consent Agreement and Final Order (CAFO) will simultaneously commence and conclude this matter.

Arco Realty Company  
Docket No. TSCA-04-2010-2702(b)

## **II. Preliminary Statements**

3. The Administrator of EPA promulgated regulations at 40 C.F.R. Part 745, Subpart F under the authority of Section 1018 of the Residential Lead-Based Paint Hazard Reduction Act of 1992, 42 U.S.C. § 4852d. Pursuant to 42 U.S.C. § 4852d(b)(5), a violation of any rule in 40 C.F.R. Part 745, is a prohibited act under Section 409 of TSCA, 15 U.S.C. § 2689. Any person who violates Section 409 of TSCA may be assessed a penalty of up to \$10,000 for each such violation, in accordance with Section 16(a) of TSCA, 15 U.S.C. § 2615(a) and Section 1018. For a violation occurring after January 31, 1997, a penalty of up to \$11,000 may be assessed pursuant to 40 C.F.R. Part 19, as amended, and in accordance with 40 C.F.R. § 745.118(f).
4. The authority to take action under Section 16(a) of TSCA, 15 U.S.C. § 2615(a), is vested in the Administrator of EPA. The Administrator of EPA has delegated this authority under TSCA to EPA Region 4 by EPA Delegation 12-2-A, dated May 11, 1994. The Regional Administrator, Region 4, has redelegated this authority to the Director, Air, Pesticides and Toxics Management Division, by EPA Region 4 Delegation 12-2-A. Pursuant to the aforementioned delegations, the Director of Air, pesticides and Toxics Management division has authority to commence an enforcement action as the Complainant in this matter.
5. Pursuant to 40 C.F.R. § 22.5(c)(4), the following individual represents EPA in this matter and is authorized to receive service for EPA in this proceeding:

Kevin L. Woodruff  
Lead and Children's  
Health Section  
U.S. EPA Region 4  
61 Forsyth Street, SW  
Atlanta, GA 30303-8960  
(404) 562-8828.

### **III. Specific Allegations**

6. Respondent is a Lessor, as defined at 40 C.F.R. § 745.103, of residential housing located at 309-1 N. Spring Street, Greensboro, NC. This residential housing is "target housing," as defined at 40 C.F.R. § 745.103.
7. Based on information obtained by EPA on or about June 4, 2007, relating to Respondent's contracts to lease its target housing described above, EPA alleges that Respondent violated Section 409 of TSCA and 40 C.F.R. Part 745, Subpart F as follows:
  - a. Pursuant to 40 C.F.R. § 745.107(a)(2), a Lessor shall disclose to the Lessee the presence of any known lead-based paint and/or lead-based paint hazards in the target housing. Respondent failed to disclose to the Lessee the presence of any known lead-based paint in at least one lease.
  - b. Pursuant to 40 C.F.R. § 745.107(a)(3), a Lessor shall disclose to each Agent the presence of any known lead-based paint and/or lead-based paint hazards in the target housing and the existence of any available records or reports pertaining to lead-based paint. Respondent failed to disclose to the Agent the presence of any known lead-based paint and the existence of any records or reports in at least one lease.
  - c. Pursuant to 40 C.F.R. § 745.107(a)(4), a Lessor shall provide to the Lessee any records or reports available to the Lessor pertaining to lead-based paint and/or lead-

based paint hazards in the target housing. Respondent failed provide to the Lessee any records or reports in at least one lease.

- d. Pursuant to 40 C.F.R. § 745.113(b)(2), each contract to lease target housing shall include, as an attachment to or within the contract, a statement disclosing the presence of known lead-based paint and/or lead-based paint hazards in the target housing being purchased or a statement indicating no knowledge of the presence of lead-based paint and/or lead-based paint hazards. Respondent failed to include an appropriate statement in at least one lease.
- e. Pursuant to 40 C.F.R. § 745.113(b)(3), each contract to lease target housing shall include, as an attachment to or within the contract, a list of any records or reports available to the Lessor that pertain to lead hazard information or an indication that no such list exists. Respondent failed to include the appropriate information in at least one lease.
- f. Pursuant to 40 C.F.R. § 745.113(b)(5), each contract to lease target housing shall include, as an attachment to or within the contract, a statement by the one or more Agents involved in the transaction to lease target housing that the Agent(s) has informed the Lessor of the Lessor's obligations and that the Agent(s) is aware of his duty to ensure compliance. Respondent failed to include the appropriate information in at least one lease.
- g. Pursuant to 40 C.F.R. § 745.113(b)(6), each contract to lease target housing shall include in the contract for lease signatures of the Lessor, Agent and Lessee certifying to the accuracy of their statements, as well as dates. Respondent failed to include the appropriate information in at least one lease.

#### **IV. Consent Agreement**

8. For the purposes of this CAFO, Respondent admits the jurisdictional allegations set forth above and neither admits nor denies the factual allegations set forth above.
9. Respondent waives its right to a hearing on the allegations contained herein and its right to appeal the proposed final order accompanying the consent agreement.
10. Respondent consents to the assessment of the penalty proposed by EPA and agrees to pay the civil penalty as set forth in this CAFO.
11. Respondent certifies that as of the date of its execution of this CAFO, it is in compliance with all relevant requirements of 40 C.F.R. Part 745, Subpart F.
12. This CAFO constitutes a settlement by EPA of all claims for civil penalties pursuant to Section 16(a) of TSCA, for the specific violations alleged herein. Except as specifically provided in this CAFO, EPA reserves all other civil and criminal enforcement authorities, including the authority to address imminent hazards. Compliance with this CAFO shall not be a defense to any other actions subsequently commenced pursuant to Federal laws and regulations administered by EPA, and it is Respondent's responsibility to comply with said laws and regulations.
13. Complainant and Respondent agree to settle this matter by their execution of this CAFO. The parties agree that the settlement of this matter is in the public interest and that this CAFO is consistent with the applicable requirements of 40 C.F.R. Part 745, Subpart F.

#### **V. Terms of Settlement**

14. Pursuant to 15 U.S.C. § 2615(a), TSCA Section 16(a), the nature of the alleged violation, Respondent's agreement to perform a Supplemental Environmental Project (SEP) and

other relevant factors, EPA has determined that an appropriate civil penalty to settle this action is in the amount of **ONE THOUSAND ONE HUNDRED DOLLARS** (\$1,100).

15. Respondent consents to the issuance of this CAFO and consents for purposes of settlement to the payment of the civil penalty as cited in the foregoing paragraph and to the performance of the SEP set forth herein.
16. Respondent shall complete the following SEP, which the parties agree is intended to secure significant environmental or public health protection.
  - a. Perform stabilization and abatement of lead-based paint and lead dust identified at 309-1 N. Spring Street, Greensboro, North Carolina, 803-G Oak Street, Greensboro, North Carolina, 400-N Berryman Street, Greensboro, North Carolina, 1206 Valleyview Street, Greensboro, North Carolina, 2316-B Kersey Street, Greensboro, North Carolina and 2333-E Floyd Street, Greensboro, North Carolina.
  - b. The SEP is more specifically described in the scope of work, attached hereto as Exhibit A and incorporated herein by reference.
17. The total expenditure for the SEP shall not be less than **TEN THOUSAND SIX HUNDRED TWENTY DOLLARS** (\$10,620). Respondent shall include documentation of the expenditures made in connection with the SEP as part of the SEP Completion Report set forth herein.
18. Respondent shall submit the following reports to EPA regarding the progress and completion of the SEP.
  - a. Respondent shall submit a SEP Completion report to EPA within forty five (45) days after issuance of a clearance letter by the abatement contractor indicating completion

of the SEP. The SEP Completion Report shall contain the following information:

- (i). a detailed description of the SEP as implemented;
  - (ii). An affidavit from an authorized company official, attesting that the SEP has been completed or explaining in detail any failure to complete;
  - (iii). Copies of appropriate documentation, including invoices, purchase orders, or other documentation that specifically identifies and itemizes the individual costs of the goods and/or services for which payment is being made. Canceled drafts do not constitute acceptable documentation unless such drafts specifically identify and itemize the individual costs of the goods and/or services for which payment is being made.
- b. Respondent agrees that failure to submit the SEP Completion Report required as set herein above shall be deemed in violation of this CAFO and Respondent shall become liable for stipulated penalties pursuant to paragraph 20 below.
  - c. Respondent shall submit all reports required by this CAFO by first class mail or overnight delivery service to the following:

Kevin Woodruff  
Lead and Children's  
Health Section  
U.S. EPA Region 4  
61 Forsyth Street, SW  
Atlanta, GA 30303-8960.

19. Respondent's agrees that EPA may inspect the facility at any time in order to confirm that the SEP is being undertaken in conformity with the representations made herein.
20. If Respondent fails to comply with any of the terms or provisions of this CAFO relating to the performance of the SEP and/or to the extent that the actual



expenditures for the SEP do not equal or exceed the cost of the SEP described in paragraph 17 above, Respondent shall be liable for stipulated penalties according to the provisions set forth below:

- a. Except as provided in subparagraph (b) immediately below, if the SEP is not completed satisfactorily, Respondent shall pay a stipulated penalty to the United States in the amount of **SIXTEEN THOUSAND ONE HUNDRED SIXTY DOLLARS (\$16,160)**.
- b. If the SEP is not completed satisfactorily, and the EPA determines that the Respondent has made good faith and timely efforts to complete the SEP and has certified with supporting documentation that at least 90 percent of the minimum amount of money which was required to be spent was expended on the SEP, Respondent shall not be liable for any stipulated penalty.
- c. If the SEP is satisfactorily completed, and Respondent spent at least 90 percent of the minimum amount of money required to be spent for the SEP, Respondent shall not be liable for any stipulated penalty.
- d. If the SEP is satisfactorily completed, but the Respondent spent less than 90 percent of the minimum amount of money required to be spent for the SEP, Respondent shall pay a stipulated penalty of **ONE THOUSAND SIX HUNDRED SIXTEEN DOLLARS (\$1,616)**.
- e. For failure to timely submit a SEP Completion Report required by paragraph 18(a) above, Respondent shall pay a stipulated penalty in the amount of **ONE HUNDRED DOLLARS (\$100)** for each day the report is late.
- f. The determination of whether the SEP has been satisfactorily completed and

whether the Respondent has made a good faith, timely effort to implement and complete the SEP shall be in the sole discretion of EPA.

g. Payment of stipulated penalties shall be due not more than fifteen (15) days after receipt of written demand by EPA for such penalties. The method of payment shall be in accordance with the provisions of paragraphs 25 and 26 below.

21. Respondent certifies that, as of the date this CAFO is signed, Respondent is not required to perform any part of the SEP by any federal, state or local law, regulation, permit or order, or by any agreement or grant. Respondent further certifies that it has not received, and is not negotiating to receive, credit for any part of the SEP in any other enforcement action of any kind.
22. For Federal Income Tax purposes, Respondent agrees that it will neither capitalize into inventory or basis nor deduct any costs or expenditures incurred in performing the SEP.
23. Any public statement, oral or written, made by Respondent making reference to the SEP shall include the following language, "This project was undertaken in connection with the settlement of an enforcement action taken by the U.S. Environmental Protection Agency for violations of Section 409 of the Toxic Substance Control Act, 15 U.S.C. § 2689."

#### **VI. Final Order**

24. Respondent is assessed a civil penalty of **ONE THOUSAND ONE HUNDRED THIRTY ONE DOLLARS and TWENTY CENTS (\$1,131.20)** which shall be paid within 30 days from the effective date of this CAFO.
25. Respondent shall remit the civil penalty by either a cashier's or certified check made payable to the "Treasurer, United States of America," and shall send the check to the following address by U.S. Postal Service:

following address by U.S. Postal Service:

U.S. Environmental Protection Agency  
Fines and Penalties  
Cincinnati Finance Center  
PO Box 979077  
St. Louis, MO 63197-9000.

**The check shall reference on its face the name of the  
Respondent and Docket Number of this CAFO.**

26. At the time of payment, Respondent shall send a separate copy of the check and a written statement that the payment has been made in accordance with this CAFO, to each of the following persons at the following addresses:

Regional Hearing Clerk  
U.S. EPA Region 4  
61 Forsyth Street, SW  
Atlanta, GA 30303-8960;

Kevin L. Woodruff  
Lead and Children's  
Health Section  
U.S. EPA Region 4  
61 Forsyth Street, SW  
Atlanta, GA 30303-8960;

and,

Saundi Wilson  
Office of Environmental Accountability  
U.S. EPA - Region 4  
61 Forsyth Street, SW  
Atlanta, GA 30303-8960.

27. For the purposes of state and federal income taxation, Respondent shall not be entitled, and agrees not to attempt, to claim a deduction for any civil penalty payment made pursuant to this CAFO. Any attempt by Respondent to deduct any such payments shall constitute a violation of this CAFO.

28. Pursuant to 31 U.S.C. § 3717, EPA is entitled to assess interest and penalties on debts owed to the United States and a charge to cover the cost of processing and handling a delinquent claim. Interest will therefore begin to accrue on the civil penalty from the date of entry of this CAFO, if the penalty is not paid by the date required. A charge will also be assessed to cover the administrative costs, both direct and indirect, of overdue debts. In addition, a late payment penalty charge shall be applied on any principal amount not paid within 90 days of the due date.
29. Complainant and Respondent shall bear their own costs and attorney fees in this matter.
30. This CAFO shall be binding upon the Respondent, its successors and assigns.
31. The undersigned representative of the party to this CAFO certifies that he or she is fully authorized by the party represented to enter into this CAFO and legally binds that party to this CAFO.

**[ The remainder of this page is intentionally left blank ]**

**VII. Effective Date**

32. The effective date of this CAFO shall be the date on which the CAFO is filed with the Regional Hearing Clerk.

**AGREED AND CONSENTED TO:**

**Respondent: ARCO REALTY COMPANY**  
**Docket No.: TSCA-04-2010-2702(b)**

By: Bill Agapion (Signature) Date: 3-25-10  
Name: BILL AGAPION (Typed or Printed)  
Title: OWNER (Typed or Printed)

**Complainant: U.S. Environmental Protection Agency**

By: Kenneth R. Lapierre (Signature) Date: 4/19/2010  
Kenneth R. Lapierre, Acting Director  
Air, Pesticides and Toxics  
Management Division  
U.S. EPA, Region 4  
61 Forsyth Street, SW  
Atlanta, Georgia 30303-8960

**APPROVED AND SO ORDERED** this 29<sup>th</sup> day of April, 2010.

By: Susan B. Schub  
Susan B. Schub  
Regional Judicial Officer

**CERTIFICATE OF SERVICE**

I hereby certify that on the date set out below, I filed the original and one copy of the foregoing Consent Agreement and Final Order and served a true and correct copy of the foregoing Consent Agreement and Final Order, in the Matter of: ARCO Realty Company, Docket Number: TSCA-04-2010-2702(b), to the addressees listed below.

Kevin Woodruff  
Lead and Children's  
Health Section  
U.S. EPA Region 4  
61 Forsyth Street, SW  
Atlanta, GA 30303-8960

(via EPA's internal mail)

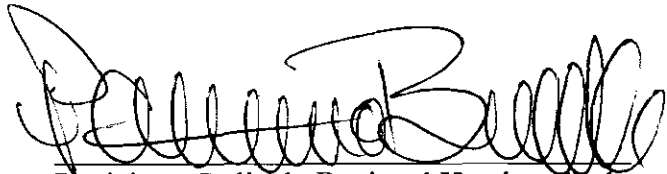
Robert Caplan  
Office of Environmental Accountability  
U.S. EPA, Region 4  
61 Forsyth St., SW  
Atlanta, GA 30303-8960

(via EPA's internal mail)

Mrs. Irene Agapion-Palamaris  
Arco Realty Company  
625 South Elm Street  
Greensboro, NC 27406

(via Certified Mail, Return Receipt Requested)

Date: 4-29-10



Patricia A. Bullock, Regional Hearing Clerk  
U.S. Environmental Protection Agency, Region 4  
Atlanta Federal Center  
61 Forsyth St., SW  
Atlanta, GA 30303-8960  
(404) 562-9511

EPA ACCOUNTS RECEIVABLE CONTROL NUMBER FORM

TO BE COMPLETED BY THE ORIGINATING OFFICE:

(Attach a copy of the final order and transmittal letter to Defendant/Respondent)

This form was originated by: Saundi Wilson on 4/27/10 (Name) (Date)

in the Region 4, ORC, OEA at (404) 562-9504 (Office) (Telephone Number)

- Non-SF Judicial Order/Consent Decree USAO COLLECTS
Administrative Order/Consent Agreement FMO COLLECTS PAYMENT
SF Judicial Order/Consent Decree DOJ COLLECTS
Oversight Billing - Cost Package required: Sent with bill
Other Receivable
Not sent with bill
This is an original debt
Oversight Billing - Cost Package not required
This is a modification

PAYEE: ARCO Realty Co. (Name of person and/or Company/Municipality making the payment)

The Total Dollar Amount of the Receivable: \$ 1100 (If installments, attach schedule of amounts and respective due dates. See Other side of this form.)

The Case Docket Number: TSCA 04 2010 2702.(b)

The Site Specific Superfund Account Number:

The Designated Regional/Headquarters Program Office:

The IFMS Accounts Receivable Control Number is: Date

If you have any questions, please call: of the Financial Management Section at:

DISTRIBUTION:

A. JUDICIAL ORDERS: Copies of this form with an attached copy of the front page of the FINAL JUDICIAL ORDER should be mailed to:

- 1. Debt Tracking Officer Environmental Enforcement Section Department of Justice RM 1647 P.O. Box 7611, Benjamin Franklin Station Washington, D.C. 20044
2. Originating Office (EAD) Designated Program Office

B. ADMINISTRATIVE ORDERS: Copies of this form with an attached copy of the front page of the Administrative Order should be to:

- 1. Originating Office Regional Hearing Clerk
2. Designated Program Office Regional Counsel (EAD)

This cost estimate is based on remediation and abatement activities completed on similar projects. Quantities and areas of lead-based paint cited in this report are estimates based on visible site conditions. Contractors should complete a site visit and collect measurements prior to providing a bid. The cost estimate does not include consulting fees, permit fees or compromised non-lead based components (i.e., damaged roof in need of repair to meet the housing code). Several cost estimates from qualified contractors should be obtained prior to completing the recommended work.

This report was prepared pursuant to the contract Roy Consulting Group has with ARCO Realty Company. That contractual relationship included an exchange of information about the property that was unique and between Roy Consulting Group and ARCO Realty Company and serves as the basis upon which this report was prepared. Because of the importance of the communication between Roy Consulting Group and ARCO Realty Company, reliance or any use of this report by anyone other than ARCO Realty Company for whom it was prepared and property managers of this property is prohibited and therefore not foreseeable by Roy Consulting Group.

Reliance or use by any such third party without explicit authorization in the report does not make said third party a third party beneficiary to Roy Consulting Group's contract with ARCO Realty Company. Any such unauthorized reliance on or use of this report, including any of its information or conclusions, will be at the third party's risk. For the same reasons, no warranties or representations, expressed or implied in this report, are made to any such third party.

We appreciate this opportunity to provide professional services for this project. If we can be of further assistance, or if you have any questions concerning this report, please do not hesitate to call us at 704.968.4111.

Sincerely,

**ROY CONSULTING GROUP CORPORATION**

*James E. Roy, Jr.*

James E. Roy, Jr.  
NC Lead Supervisor #130172  
NC Lead Project Designer #140041  
Principal

*Patricia P. Roy*

Patricia P. Roy  
President

**ROY CONSULTING GROUP CORPORATION**



**Roy Consulting Group recommends that a lead-based paint project design be completed by a North Carolina certified lead-based paint project designer prior to completion of any lead remediation and/or abatement work.**

Paint films usually have varying amounts of lead on what appears to be a homogeneous painted area. Caution should always be used during demolition or renovation operations to prevent potential lead exposure. Additionally, mechanical disturbance (sanding, grinding, etc.) of the lead-based paint or lead-containing paint should be avoided.

### **3.0 LEAD-BASED PAINT REMEDIATION AND ABATEMENT CLEARANCE AND RE-EVALUATION**

**Following completion of the recommended work and proper cleaning, a lead-based paint clearance inspection should be completed that includes visual inspection and analysis of dust wipe samples.** The clearance samples may not be collected from the same room or component that was found to contain lead; therefore, all surfaces should be prepared for clearance sampling.

**Following the completion of the recommended abatement work, intact lead-containing paint will remain on-site. An annual visual assessment of the lead-based paint condition is recommended to confirm the paint remains intact. Additionally, a lead maintenance plan should be completed following remediation and/or abatement which identifies the locations of the remaining lead-based paint and lead-containing paint and includes recommendations for maintenance of these items.**

### **4.0 QUALIFICATIONS**

This report summarizes Roy Consulting Group's evaluation of the conditions observed at the subject property during the course of the survey to identify lead-based paints. Our findings are based upon our observations at the property and sampling performed at the time of the inspection activities. Additional lead-based paints may exist in other portions of the property but were undetected due to inaccessibility or due to an imperceptible change in paints. Any conditions discovered which deviate from the data contained in this report should be presented to us for our evaluation. The information contained in this report is based upon the data furnished by ARCO Realty Company and observations and test results provided by Roy Consulting Group. These observations and results are time dependent and are subject to changing site conditions and revisions to federal, state, and local regulations.

**ROY CONSULTING GROUP CORPORATION**

## 2.0 RECOMMENDED ACTIONS AND COST ESTIMATE

Lead-based paint was identified at the subject property during the inspection. We recommend the following work be completed as listed below.

Location and Description of Lead-Based Paint	Recommended Action	Estimated Cost
Exterior – Door B1 (Front Door) – white wood door, jambs and stops	Replace door, jambs and stops. The door casings, header and lintel cover are coated with lead-containing paint. We recommend replacing these components or covering them with tyvek and aluminum.	\$600

**Note:** The exterior window casings, headers, sills, sashes, wells and lintel covers are coated with lead-containing paint. These components may have been originally painted with lead-based paint and scraped and re-painted at a later time. These items may also have been painted with paint that contained levels of lead below 1.0 mg/cm<sup>2</sup>.

Note: Based on HUD guidelines, the sides of the house, including the windows, doors, and cabinets, are identified by letter. The A-side of the house is the side facing the road and is typically the location of the main entrance door to the house. The remaining three sides of the house are denoted with letters B through D moving clockwise from the front of the house. Exterior windows throughout the house are additionally identified by a number, beginning with number one, which identifies the window on the farthest right side of the exterior wall. The next window moving toward the left is window two, etc. Thus, the far right window on wall A or A-side is window A1, the second window moving to the left is A2, the third window is A3, etc. When windows exist on a second floor, the window label will have the floor number in front of the letter. Thus, the farthest right window on the second floor wall A or A-side is 2A1. Exterior doors are identified with the same numbering system. Interior doors and windows are numbered similarly, however the numbering is specific to the room. Thus, several rooms may have door A1 which would be the far left door on wall A or A-side (when looking at the room from the front of the house). Also, lead-based paint may exist under an exposed substrate. Thus, if a substrate is identified as containing lead-based paint, yet is unpainted, lead-based paint may exist beneath the exposed substrate (i.e., paint under vinyl siding).

**ROY CONSULTING GROUP CORPORATION**

**ROY CONSULTING GROUP  
CORPORATION**

**9823 BALMORAL CIRCLE  
CHARLOTTE, NORTH CAROLINA 28210  
PHONE: 704.968.4111 FAX: 704.553.9458**

February 27, 2010

Ms. Irene Agapion-Palamaris  
ARCO Realty Company  
625 South Elm Street  
Greensboro, North Carolina 27406

Subject: **LEAD-BASED PAINT REMEDIATION PLAN  
2316 KERSEY STREET, UNIT B  
GREENSBORO, NORTH CAROLINA 27406  
ROY CONSULTING GROUP CORPORATION PROJECT #38-060509**

Dear Ms. Agapion-Palamaris:

As authorized by the contract between ARCO Realty Company and Roy Consulting Group Corporation (Roy Consulting Group) dated June 5, 2009, we are pleased to submit this Lead-Based Paint Remediation Plan for the subject property location. The plan summarizes our lead-based paint remediation recommendations based on the data collected and documented in the Lead-Based Paint Inspection and Risk Assessment Report dated July 27, 2009.

**1.0 INTRODUCTION**

The subject property is a single-story, brick exterior, six-unit, residential apartment complex with asphalt shingle roof and crawlspace. The inspection and risk assessment services completed July 27, 2009 and this remediation plan are limited to Unit B (the first floor, right unit when looking at the front of the house located between Unit A and Unit C). The date of construction is unknown, and apartment B was unoccupied at the time of the inspection.

Reliance or use by any such third party without explicit authorization in the report does not make said third party a third party beneficiary to Roy Consulting Group's contract with ARCO Realty Company. Any such unauthorized reliance on or use of this report, including any of its information or conclusions, will be at the third party's risk. For the same reasons, no warranties or representations, expressed or implied in this report, are made to any such third party.

We appreciate this opportunity to provide professional services for this project. If we can be of further assistance, or if you have any questions concerning this report, please do not hesitate to call us at 704.968.4111.

Sincerely,

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NC Lead Supervisor #130172  
NC Lead Project Designer #140041  
Principal

*Patricia P. Roy*

Patricia P. Roy  
President

**ROY CONSULTING GROUP CORPORATION**

### **3.0 LEAD-BASED PAINT REMEDIATION AND ABATEMENT CLEARANCE AND RE-EVALUATION**

**Following completion of the recommended work and proper cleaning, a lead-based paint clearance inspection should be completed that includes visual inspection and analysis of dust wipe samples.** The clearance samples may not be collected from the same room or component that was found to contain lead; therefore, all surfaces should be prepared for clearance sampling.

### **4.0 QUALIFICATIONS**

This report summarizes Roy Consulting Group's evaluation of the conditions observed at the subject property during the course of the survey to identify lead-based paints. Our findings are based upon our observations at the property and sampling performed at the time of the inspection activities. Additional lead-based paints may exist in other portions of the property but were undetected due to inaccessibility or due to an imperceptible change in paints. Any conditions discovered which deviate from the data contained in this report should be presented to us for our evaluation. The information contained in this report is based upon the data furnished by ARCO Realty Company and observations and test results provided by Roy Consulting Group. These observations and results are time dependent and are subject to changing site conditions and revisions to federal, state, and local regulations.

This cost estimate is based on remediation and abatement activities completed on similar projects. Quantities and areas of lead-based paint cited in this report are estimates based on visible site conditions. Contractors should complete a site visit and collect measurements prior to providing a bid. The cost estimate does not include consulting fees, permit fees or compromised non-lead based components (i.e., damaged roof in need of repair to meet the housing code). Several cost estimates from qualified contractors should be obtained prior to completing the recommended work.

This report was prepared pursuant to the contract Roy Consulting Group has with ARCO Realty Company. That contractual relationship included an exchange of information about the property that was unique and between Roy Consulting Group and ARCO Realty Company and serves as the basis upon which this report was prepared. Because of the importance of the communication between Roy Consulting Group and ARCO Realty Company, reliance or any use of this report by anyone other than ARCO Realty Company for whom it was prepared and property managers of this property is prohibited and therefore not foreseeable by Roy Consulting Group.

**ROY CONSULTING GROUP CORPORATION**

## 2.0 RECOMMENDED ACTIONS AND COST ESTIMATE

Lead-based paint was identified at the subject property during the inspection. We recommend the following work be completed as listed below.

Location and Description of Lead-Based Paint	Recommended Action	Estimated Cost
Hall 1 - Room 3 Stairwell - brown vinyl stair treads and landing	Remove.	\$200
Hall 2 - Room 4 - Closet Door A1 - white wood door	Replace door.	\$200

Note: Based on HUD guidelines, the sides of the house, including the windows, doors, and cabinets, are identified by letter. The A-side of the house is the side facing the road and is typically the location of the main entrance door to the house. The remaining three sides of the house are denoted with letters B through D moving clockwise from the front of the house. Exterior windows throughout the house are additionally identified by a number, beginning with number one, which identifies the window on the farthest right side of the exterior wall. The next window moving toward the left is window two, etc. Thus, the far right window on wall A or A-side is window A1, the second window moving to the left is A2, the third window is A3, etc. When windows exist on a second floor, the window label will have the floor number in front of the letter. Thus, the farthest right window on the second floor wall A or A-side is 2A1. Exterior doors are identified with the same numbering system. Interior doors and windows are numbered similarly, however the numbering is specific to the room. Thus, several rooms may have door A1 which would be the far left door on wall A or A-side (when looking at the room from the front of the house). Also, lead-based paint may exist under an exposed substrate. Thus, if a substrate is identified as containing lead-based paint, yet is unpainted, lead-based paint may exist beneath the exposed substrate (i.e., paint under vinyl siding).

**Roy Consulting Group recommends that a lead-based paint project design be completed by a North Carolina certified lead-based paint project designer prior to completion of any lead remediation and/or abatement work.**

Paint films usually have varying amounts of lead on what appears to be a homogeneous painted area. Caution should always be used during demolition or renovation operations to prevent potential lead exposure. Additionally, mechanical disturbance (sanding, grinding, etc.) of the lead-based paint or lead-containing paint should be avoided.

**ROY CONSULTING GROUP CORPORATION**

**ROY CONSULTING GROUP  
CORPORATION**

**9823 BALMORAL CIRCLE  
CHARLOTTE, NORTH CAROLINA 28210  
PHONE: 704.968.4111 FAX: 704.553.9458**

February 27, 2010

Ms. Irene Agapion-Palamaris  
ARCO Realty Company  
625 South Elm Street  
Greensboro, North Carolina 27406

Subject: **LEAD-BASED PAINT REMEDIATION PLAN  
2333 FLOYD STREET, APARTMENT E  
GREENSBORO, NORTH CAROLINA 27406  
ROY CONSULTING GROUP CORPORATION PROJECT #38-060509**

Dear Ms. Agapion-Palamaris:

As authorized by the contract between ARCO Realty Company and Roy Consulting Group Corporation (Roy Consulting Group) dated June 5, 2009, we are pleased to submit this Lead-Based Paint Remediation Plan for the subject property location. The plan summarizes our lead-based paint remediation recommendations based on the data collected and documented in the Lead-Based Paint Inspection and Risk Assessment Report dated July 7, 2009.

**1.0 INTRODUCTION**

The subject property is a two-story, brick and wood-exterior, slab-on-grade, multi-unit, residential housing complex with newer vinyl replacement windows and asphalt shingle roof. The inspection and risk assessment services were limited to Apartment E (the left back unit when looking at the front of the complex). The date of construction is unknown, and the apartment was occupied at the time of the inspection.





We appreciate this opportunity to provide professional services for this project. If we can be of further assistance, or if you have any questions concerning this report, please do not hesitate to call us at 704.968.4111.

Sincerely,

**ROY CONSULTING GROUP CORPORATION**

*James E. Roy, Jr.*

*Patricia P. Roy*

James E. Roy, Jr.  
NC Lead Supervisor #130172  
NC Lead Project Designer #140041  
Principal

Patricia P. Roy  
President

**ROY CONSULTING GROUP CORPORATION**

#### **4.0 QUALIFICATIONS**

This report summarizes Roy Consulting Group's evaluation of the conditions observed at the subject property during the course of the survey to identify lead-based paints. Our findings are based upon our observations at the property and sampling performed at the time of the inspection activities. Additional lead-based paints may exist in other portions of the property but were undetected due to inaccessibility or due to an imperceptible change in paints. Any conditions discovered which deviate from the data contained in this report should be presented to us for our evaluation. The information contained in this report is based upon the data furnished by ARCO Realty Company and observations and test results provided by Roy Consulting Group. These observations and results are time dependent and are subject to changing site conditions and revisions to federal, state, and local regulations.

This cost estimate is based on remediation and abatement activities completed on similar projects. Quantities and areas of lead-based paint cited in this report are estimates based on visible site conditions. Contractors should complete a site visit and collect measurements prior to providing a bid. The cost estimate does not include consulting fees, permit fees or compromised non-lead based components (i.e., damaged roof in need of repair to meet the housing code). Several cost estimates from qualified contractors should be obtained prior to completing the recommended work.

This report was prepared pursuant to the contract Roy Consulting Group has with ARCO Realty Company. That contractual relationship included an exchange of information about the property that was unique and between Roy Consulting Group and ARCO Realty Company and serves as the basis upon which this report was prepared. Because of the importance of the communication between Roy Consulting Group and GPA, Inc, reliance or any use of this report by anyone other than ARCO Realty Company for whom it was prepared and property managers of this property is prohibited and therefore not foreseeable by Roy Consulting Group.

Reliance or use by any such third party without explicit authorization in the report does not make said third party a third party beneficiary to Roy Consulting Group's contract with ARCO Realty Company. Any such unauthorized reliance on or use of this report, including any of its information or conclusions, will be at the third party's risk. For the same reasons, no warranties or representations, expressed or implied in this report, are made to any such third party.

**ROY CONSULTING GROUP CORPORATION**

moving clockwise from the front of the house. Exterior windows throughout the house are additionally identified by a number, beginning with number one, which identifies the window on the farthest right side of the exterior wall. The next window moving toward the left is window two, etc. Thus, the far right window on wall A or A-side is window A1, the second window moving to the left is A2, the third window is A3, etc. When windows exist on a second floor, the window label will have the floor number in front of the letter. Thus, the farthest right window on the second floor wall A or A-side is 2A1. Exterior doors are identified with the same numbering system. Interior doors and windows are numbered similarly, however the numbering is specific to the room. Thus, several rooms may have door A1 which would be the far left door on wall A or A-side (when looking at the room from the front of the house). Also, lead-based paint may exist under an exposed substrate. Thus, if a substrate is identified as containing lead-based paint, yet is unpainted, lead-based paint may exist beneath the exposed substrate (i.e., paint under vinyl siding).

**Roy Consulting Group recommends that a lead-based paint project design be completed by a North Carolina certified lead-based paint project designer prior to completion of any lead remediation and/or abatement work.**

Paint films usually have varying amounts of lead on what appears to be a homogeneous painted area. Caution should always be used during demolition or renovation operations to prevent potential lead exposure. Additionally, mechanical disturbance (sanding, grinding, etc.) of the lead-based paint or lead-containing paint should be avoided.

### **3.0 LEAD-BASED PAINT REMEDIATION AND ABATEMENT CLEARANCE AND RE-EVALUATION**

**Following completion of the recommended work and proper cleaning, a lead-based paint clearance inspection should be completed that includes visual inspection and analysis of dust wipe samples. The clearance samples may not be collected from the same room or component that was found to contain lead; therefore, all surfaces should be prepared for clearance sampling.**

**Following the completion of the recommended abatement work, intact lead-based paint and lead-containing paint will remain on-site. An annual visual assessment of the lead-based paint condition is recommended to confirm the paint remains intact. Additionally, a lead maintenance plan should be completed following remediation and/or abatement which identifies the locations of the remaining lead-based paint and lead-containing paint and includes recommendations for maintenance of these items.**

**ROY CONSULTING GROUP CORPORATION**

Location and Description of Lead-Based Paint	Recommended Action	Estimated Cost
Exterior - Side A through Side D - components beneath white aluminum-covered fascias and crown moldings (partially exposed wood on the Side A Porch)	Cover exposed wood with tyvek and aluminum/vinyl. Repair damaged aluminum-coverings.	\$675
Exterior - Side A through Side D - components beneath white aluminum-covered window casings, headers and sills	No work required. Aluminum coverings exist in good condition.	\$0
Exterior - Side A Porch - components beneath white aluminum-covered ceiling support beams/trim	No work required. Aluminum coverings exist in good condition.	\$0
Interior - Room 4 - Door A1 - white wood door casings and header	Replace	\$100
Interior - Room 6 - Closet A1 - white and light brown wood door, casings, header, jambs, stops, shelf, shelf supports and baseboard inside closet	Replace	\$350
Interior - Room 7 - Closet C2 - white and light brown wood door, casings, header, jambs, stops, shelf, shelf supports, baseboard inside closet and trim board inside closet (plywood piece on wall)	Replace	\$400

**Note:** Many of the interior wood baseboards, door casings, door headers, door jambs, door stops and window casings, window headers, window aprons and window sills not listed above are coated with lead-containing paint. These components may have been originally painted with lead-based paint and scraped and re-painted at a later time. These items may also have been painted with paint that contained levels of lead below 1.0 mg/cm<sup>2</sup>.

Note: Based on HUD guidelines, the sides of the house, including the windows, doors, and cabinets, are identified by letter. The A-side of the house is the side facing the road and is typically the location of the main entrance door to the house. The remaining three sides of the house are denoted with letters B through D

**ROY CONSULTING GROUP CORPORATION**

**ROY CONSULTING GROUP  
CORPORATION**

**9823 BALMORAL CIRCLE  
CHARLOTTE, NORTH CAROLINA 28210  
PHONE: 704.968.4111 FAX: 704.553.9458**

February 4, 2010

Ms. Irene Agapion-Palamaris  
ARCO Realty Company  
625 South Elm Street  
Greensboro, North Carolina 27406

Subject: **LEAD-BASED PAINT REMEDIATION PLAN  
1206 VALLEY VIEW STREET  
GREENSBORO, NORTH CAROLINA 27405  
ROY CONSULTING GROUP CORPORATION PROJECT #38-060509**

Dear Ms. Agapion-Palamaris:

As authorized by the contract between ARCO Realty Company and Roy Consulting Group Corporation (Roy Consulting Group) dated June 5, 2009, we are pleased to submit this Lead-Based Paint Remediation Plan for the subject property location. The plan summarizes our lead-based paint remediation recommendations based on the data collected and documented in the Lead-Based Paint Inspection and Risk Assessment Report dated June 8, 2009.

**1.0 INTRODUCTION**

The subject property is a single-story, single-family, vinyl-sided exterior, residential house with newer vinyl replacement windows, asphalt shingle roof and crawlspace. The date of construction is unknown, and the house was unoccupied at the time of the inspection.

**2.0 RECOMMENDED ACTIONS AND COST ESTIMATE**

Lead-based paint was identified at the subject property during the inspection. We recommend the following work be completed as listed below.

include consulting fees, permit fees or compromised non-lead based components (i.e., damaged roof in need of repair to meet the housing code). Several cost estimates from qualified contractors should be obtained prior to completing the recommended work.

This report was prepared pursuant to the contract Roy Consulting Group has with ARCO Realty Company. That contractual relationship included an exchange of information about the property that was unique and between Roy Consulting Group and ARCO Realty Company and serves as the basis upon which this report was prepared. Because of the importance of the communication between Roy Consulting Group and GPA, Inc, reliance or any use of this report by anyone other than ARCO Realty Company for whom it was prepared and property managers of this property is prohibited and therefore not foreseeable by Roy Consulting Group.

Reliance or use by any such third party without explicit authorization in the report does not make said third party a third party beneficiary to Roy Consulting Group's contract with ARCO Realty Company. Any such unauthorized reliance on or use of this report, including any of its information or conclusions, will be at the third party's risk. For the same reasons, no warranties or representations, expressed or implied in this report, are made to any such third party.

We appreciate this opportunity to provide professional services for this project. If we can be of further assistance, or if you have any questions concerning this report, please do not hesitate to call us at 704.968.4111.

Sincerely,

**ROY CONSULTING GROUP CORPORATION**

*James E. Roy, Jr.*

James E. Roy, Jr.  
NC Lead Supervisor #130172  
NC Lead Project Designer #140041  
Principal

*Patricia P. Roy*

Patricia P. Roy  
President

**ROY CONSULTING GROUP CORPORATION**

Paint films usually have varying amounts of lead on what appears to be a homogeneous painted area. Caution should always be used during demolition or renovation operations to prevent potential lead exposure. Additionally, mechanical disturbance (sanding, grinding, etc.) of the lead-based paint or lead-containing paint should be avoided.

### **3.0 LEAD-BASED PAINT REMEDIATION AND ABATEMENT CLEARANCE AND RE-EVALUATION**

Following completion of the recommended work and proper cleaning, a lead-based paint clearance inspection should be completed that includes visual inspection and analysis of dust wipe samples. The clearance samples may not be collected from the same room or component that was found to contain lead; therefore, all surfaces should be prepared for clearance sampling.

Following the completion of the recommended abatement work, intact lead-based paint and lead-containing paint will remain on-site. An annual visual assessment of the lead-based paint condition is recommended to confirm the paint remains intact. Additionally, a lead maintenance plan should be completed following remediation and/or abatement which identifies the locations of the remaining lead-based paint and lead-containing paint and includes recommendations for maintenance of these items.

### **4.0 QUALIFICATIONS**

This report summarizes Roy Consulting Group's evaluation of the conditions observed at the subject property during the course of the survey to identify lead-based paints. Our findings are based upon our observations at the property and sampling performed at the time of the inspection activities. Additional lead-based paints may exist in other portions of the property but were undetected due to inaccessibility or due to an imperceptible change in paints. Any conditions discovered which deviate from the data contained in this report should be presented to us for our evaluation. The information contained in this report is based upon the data furnished by ARCO Realty Company and observations and test results provided by Roy Consulting Group. These observations and results are time dependent and are subject to changing site conditions and revisions to federal, state, and local regulations.

This cost estimate is based on remediation and abatement activities completed on similar projects. Quantities and areas of lead-based paint cited in this report are estimates based on visible site conditions. Contractors should complete a site visit and collect measurements prior to providing a bid. The cost estimate does not

**ROY CONSULTING GROUP CORPORATION**

Location and Description of Lead-Based Paint (continued)	Recommended Action	Estimated Cost
Interior - Room 6 - Side B through Side D - older white wood cabinet frames, cabinet door, cabinet shelves and interior cabinets including sealed cabinet on Side D (the cabinets under the sink are newer and are not coated with lead-based paint)	Remove (Some new cabinets exist where the sink is located. We understand the owner will replace the removed cabinets with new cabinets following abatement and remediation activities and successful clearance.)	\$600
Interior - Room 7 - Side D - white wood board on wall to secure electrical boxes	No work required. These items were recently painted and exist in good condition.	\$0

**Note: It is probable the components located beneath the exterior aluminum and vinyl coverings of the house not identified above are coated with lead-based paint.**

Note: Based on HUD guidelines, the sides of the house, including the windows, doors, and cabinets, are identified by letter. The A-side of the house is the side facing the road and is typically the location of the main entrance door to the house. The remaining three sides of the house are denoted with letters B through D moving clockwise from the front of the house. Exterior windows throughout the house are additionally identified by a number, beginning with number one, which identifies the window on the farthest right side of the exterior wall. The next window moving toward the left is window two, etc. Thus, the far right window on wall A or A-side is window A1, the second window moving to the left is A2, the third window is A3, etc. When windows exist on a second floor, the window label will have the floor number in front of the letter. Thus, the farthest right window on the second floor wall A or A-side is 2A1. Exterior doors are identified with the same numbering system. Interior doors and windows are numbered similarly, however the numbering is specific to the room. Thus, several rooms may have door A1 which would be the far left door on wall A or A-side (when looking at the room from the front of the house). Also, lead-based paint may exist under an exposed substrate. Thus, if a substrate is identified as containing lead-based paint, yet is unpainted, lead-based paint may exist beneath the exposed substrate (i.e., paint under vinyl siding).

**Roy Consulting Group recommends that a lead-based paint project design be completed by a North Carolina certified lead-based paint project designer prior to completion of any lead remediation and/or abatement work.**

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Location and Description of Lead-Based Paint (continued)	Recommended Action	Estimated Cost
<u>Interior - Room 1 - Door A1</u> - white wood door, casings, header, jambs and stops including decorative window frames and sashes	Replace door, jambs and stop (cost included above for Exterior Door A1). No work required on casings, header, decorative window frames and sashes (non-moveable). These items were recently painted and exist in good condition.	\$200
<u>Interior - Room 1 - Door C1</u> - white wood main door, casings, header, jambs and stops	Replace door, jambs and stop. No work required on casings and header. These items were recently painted and exist in good condition.	\$300
<u>Interior - Room 1 - Side B through Side D</u> - white wood stair risers (entire stairwell)	Cover with finish wood sheeting and paint white to match baseboards.	\$900
<u>Interior - Room 2 - Side B</u> - white wood plumbing access panel door frame	Replace door and frame.	\$175
<u>Interior - Room 3 and Room 5 - Side A through Side D</u> - white wood crown moldings	No work required. These items were recently painted and exist in good condition.	\$0
<u>Interior - Room 4 - Side A through Side D</u> - white wood chair rail	No work required. These items were recently painted and exist in good condition.	\$0
<u>Interior - Room 4 - Side C</u> - white wood medicine cabinet door, medicine cabinet frame and interior medicine cabinet	Replace	\$225
<u>Interior - Room 6 - Side A through Side D</u> - light brown plaster walls including inside cabinets	Cover with hard-rigid surface such as wood paneling or plastic paneling (mechanically fastened and dust tight)	\$1,400

Location and Description of Lead-Based Paint	Recommended Action	Estimated Cost
Exterior - Side A through Side D - components beneath white aluminum-covered fascias	No work required. Aluminum coverings exist in good condition.	\$0
Exterior - Side A Entry - components beneath white aluminum-covered ceiling support beam bottoms	No work required. Aluminum coverings exist in good condition.	\$0
Exterior - Door A1 - components beneath white aluminum-covered door casings and header	No work required. Aluminum coverings exist in good condition.	\$0
Exterior - Door A1 - white wood door, jambs and stops, decorative window frames and decorative window sashes	Replace door, jambs and stops and cover decorative window frames and decorative window sashes with tyvek and aluminum	\$600
Exterior - Side C - white aluminum-covered crawlspace door casings and header and white wood crawlspace door, jambs and stops	Replace	\$395
Interior - Throughout - white wood window casings, headers, aprons, sills and sashes	No work required. These items were recently painted and exist in good condition.	\$0
Interior - Throughout - white wood door casings, headers, jambs and stops including closets and top molding trim on door headers	Replace door jambs and stops. Clean and re-paint casings, headers and molding trim where paint was disturbed during work.	\$1,200
Interior - Throughout - white and light brown wood baseboards including stairs and inside closets	No work required. These items were recently painted and exist in good condition.	\$0

# **ROY CONSULTING GROUP CORPORATION**

**9823 BALMORAL CIRCLE  
CHARLOTTE, NORTH CAROLINA 28210  
PHONE: 704.968.4111 FAX: 704.553.9458**

February 4, 2010

Ms. Irene Agapion-Palamaris  
ARCO Realty Company  
625 South Elm Street  
Greensboro, North Carolina 27406

**Subject: LEAD-BASED PAINT REMEDIATION PLAN  
309 NORTH SPRING STREET, UNIT #1  
GREENSBORO, NORTH CAROLINA 27401  
ROY CONSULTING GROUP CORPORATION PROJECT #38-060509**

Dear Ms. Agapion-Palamaris:

As authorized by the contract between ARCO Realty Company and Roy Consulting Group Corporation (Roy Consulting Group) dated June 5, 2009, we are pleased to submit this Lead-Based Paint Remediation Plan for the subject property location. The plan summarizes our lead-based paint remediation recommendations based on the data collected and documented in the Lead-Based Paint Inspection and Risk Assessment Report dated June 8, 2009.

## **1.0 INTRODUCTION**

The subject property is a single-story, single-family, vinyl-sided exterior, residential house with newer vinyl replacement windows, asphalt shingle roof and crawlspace. The date of construction is unknown, and the house was unoccupied at the time of the inspection.

## **2.0 LEAD-BASED PAINT IDENTIFIED DURING THE INSPECTION**

Lead-based paint was identified at the subject property during the inspection. We recommend the following work be completed as listed below.

Reliance or use by any such third party without explicit authorization in the report does not make said third party a third party beneficiary to Roy Consulting Group's contract with ARCO Realty Company. Any such unauthorized reliance on or use of this report, including any of its information or conclusions, will be at the third party's risk. For the same reasons, no warranties or representations, expressed or implied in this report, are made to any such third party.

We appreciate this opportunity to provide professional services for this project. If we can be of further assistance, or if you have any questions concerning this report, please do not hesitate to call us at 704.968.4111.

Sincerely,

**ROY CONSULTING GROUP CORPORATION**

*James E. Roy, Jr.*

James E. Roy, Jr.  
NC Lead Supervisor #130172  
NC Lead Project Designer #140041  
Principal

*Patricia P. Roy*

Patricia P. Roy  
President

**ROY CONSULTING GROUP CORPORATION**

### **3.0 LEAD-BASED PAINT REMEDIATION AND ABATEMENT CLEARANCE AND RE-EVALUATION**

Following completion of the recommended work and proper cleaning, a lead-based paint clearance inspection should be completed that includes visual inspection and analysis of dust wipe samples. The clearance samples may not be collected from the same room or component that was found to contain lead; therefore, all surfaces should be prepared for clearance sampling.

### **4.0 QUALIFICATIONS**

This report summarizes Roy Consulting Group's evaluation of the conditions observed at the subject property during the course of the survey to identify lead-based paints. Our findings are based upon our observations at the property and sampling performed at the time of the inspection activities. Additional lead-based paints may exist in other portions of the property but were undetected due to inaccessibility or due to an imperceptible change in paints. Any conditions discovered which deviate from the data contained in this report should be presented to us for our evaluation. The information contained in this report is based upon the data furnished by ARCO Realty Company and observations and test results provided by Roy Consulting Group. These observations and results are time dependent and are subject to changing site conditions and revisions to federal, state, and local regulations.

This cost estimate is based on remediation and abatement activities completed on similar projects. Quantities and areas of lead-based paint cited in this report are estimates based on visible site conditions. Contractors should complete a site visit and collect measurements prior to providing a bid. The cost estimate does not include consulting fees, permit fees or compromised non-lead based components (i.e., damaged roof in need of repair to meet the housing code). Several cost estimates from qualified contractors should be obtained prior to completing the recommended work.

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**ROY CONSULTING GROUP CORPORATION**

Location and Description of Lead-Based Paint	Recommended Action	Estimated Cost
Interior - Bedroom 2 (room 4) Side A through Side D - white wood baseboards	Replace	\$575

**Note:** It appears the exterior the older fascias, soffits, crown moldings and trim boards are coated with lead-containing paint. These components may have been originally painted with lead-based paint and scraped and re-painted at a later time. These items may also have been painted with paint that contained levels of lead below 1.0 mg/cm<sup>2</sup>.

Note: Based on HUD guidelines, the sides of the house, including the windows, doors, and cabinets, are identified by letter. The A-side of the house is the side facing the road and is typically the location of the main entrance door to the house. The remaining three sides of the house are denoted with letters B through D moving clockwise from the front of the house. Exterior windows throughout the house are additionally identified by a number, beginning with number one, which identifies the window on the farthest right side of the exterior wall. The next window moving toward the left is window two, etc. Thus, the far right window on wall A or A-side is window A1, the second window moving to the left is A2, the third window is A3, etc. When windows exist on a second floor, the window label will have the floor number in front of the letter. Thus, the farthest right window on the second floor wall A or A-side is 2A1. Exterior doors are identified with the same numbering system. Interior doors and windows are numbered similarly, however the numbering is specific to the room. Thus, several rooms may have door A1 which would be the far left door on wall A or A-side (when looking at the room from the front of the house). Also, lead-based paint may exist under an exposed substrate. Thus, if a substrate is identified as containing lead-based paint, yet is unpainted, lead-based paint may exist beneath the exposed substrate (i.e., paint under vinyl siding).

**Roy Consulting Group recommends that a lead-based paint project design be completed by a North Carolina certified lead-based paint project designer prior to completion of any lead remediation and/or abatement work.**

Paint films usually have varying amounts of lead on what appears to be a homogeneous painted area. Caution should always be used during demolition or renovation operations to prevent potential lead exposure. Additionally, mechanical disturbance (sanding, grinding, etc.) of the lead-based paint or lead-containing paint should be avoided.

**ROY CONSULTING GROUP CORPORATION**

# **ROY CONSULTING GROUP CORPORATION**

**9823 BALMORAL CIRCLE  
CHARLOTTE, NORTH CAROLINA 28210  
PHONE: 704.968.4111 FAX: 704.553.9458**

February 4, 2010

Ms. Irene Agapion-Palamaris  
ARCO Realty Company  
625 South Elm Street  
Greensboro, North Carolina 27406

Subject: **LEAD-BASED PAINT REMEDIATION PLAN  
803G OAK STREET  
GREENSBORO, NORTH CAROLINA 27403  
ROY CONSULTING GROUP CORPORATION PROJECT #38-060509**

Dear Ms. Agapion-Palamaris:

As authorized by the contract between ARCO Realty Company and Roy Consulting Group Corporation (Roy Consulting Group) dated June 5, 2009, we are pleased to submit this Lead-Based Paint Remediation Plan for the subject property location. The plan summarizes our lead-based paint remediation recommendations based on the data collected and documented in the Lead-Based Paint Inspection and Risk Assessment Report dated August 24, 2009.

## **1.0 INTRODUCTION**

The subject property is a single-story, brick exterior, sixteen unit, residential apartment complex with asphalt shingle roof and crawlspace. The inspection and risk assessment services were limited to Unit G. The date of construction is unknown, and the apartment was occupied at the time of the inspection.

## **2.0 RECOMMENDED ACTIONS AND COST ESTIMATE**

Lead-based paint was identified at the subject property during the inspection. We recommend the following work be completed as listed below.

This report was prepared pursuant to the contract Roy Consulting Group has with ARCO Realty Company. That contractual relationship included an exchange of information about the property that was unique and between Roy Consulting Group and ARCO Realty Company and serves as the basis upon which this report was prepared. Because of the importance of the communication between Roy Consulting Group and GPA, Inc, reliance or any use of this report by anyone other than ARCO Realty Company for whom it was prepared and property managers of this property is prohibited and therefore not foreseeable by Roy Consulting Group.

Reliance or use by any such third party without explicit authorization in the report does not make said third party a third party beneficiary to Roy Consulting Group's contract with ARCO Realty Company. Any such unauthorized reliance on or use of this report, including any of its information or conclusions, will be at the third party's risk. For the same reasons, no warranties or representations, expressed or implied in this report, are made to any such third party.

We appreciate this opportunity to provide professional services for this project. If we can be of further assistance, or if you have any questions concerning this report, please do not hesitate to call us at 704.968.4111.

Sincerely,

**ROY CONSULTING GROUP CORPORATION**

*James E. Roy, Jr.*

James E. Roy, Jr.  
NC Lead Supervisor #130172  
NC Lead Project Designer #140041  
Principal

*Patricia P. Roy*

Patricia P. Roy  
President

**ROY CONSULTING GROUP CORPORATION**



### **3.0 LEAD-BASED PAINT REMEDIATION AND ABATEMENT CLEARANCE AND RE-EVALUATION**

**Following completion of the recommended work and proper cleaning, a lead-based paint clearance inspection should be completed that includes visual inspection and analysis of dust wipe samples. The clearance samples may not be collected from the same room or component that was found to contain lead; therefore, all surfaces should be prepared for clearance sampling.**

**Following the completion of the recommended abatement work, intact lead-based paint and lead-containing paint will remain on-site. An annual visual assessment of the lead-based paint condition is recommended to confirm the paint remains intact. Additionally, a lead maintenance plan should be completed following remediation and/or abatement which identifies the locations of the remaining lead-based paint and lead-containing paint and includes recommendations for maintenance of these items.**

### **4.0 QUALIFICATIONS**

This report summarizes Roy Consulting Group's evaluation of the conditions observed at the subject property during the course of the survey to identify lead-based paints. Our findings are based upon our observations at the property and sampling performed at the time of the inspection activities. Additional lead-based paints may exist in other portions of the property but were undetected due to inaccessibility or due to an imperceptible change in paints. Any conditions discovered which deviate from the data contained in this report should be presented to us for our evaluation. The information contained in this report is based upon the data furnished by ARCO Realty Company and observations and test results provided by Roy Consulting Group. These observations and results are time dependent and are subject to changing site conditions and revisions to federal, state, and local regulations.

This cost estimate is based on remediation and abatement activities completed on similar projects. Quantities and areas of lead-based paint cited in this report are estimates based on visible site conditions. Contractors should complete a site visit and collect measurements prior to providing a bid. The cost estimate does not include consulting fees, permit fees or compromised non-lead based components (i.e., damaged roof in need of repair to meet the housing code). Several cost estimates from qualified contractors should be obtained prior to completing the recommended work.

**ROY CONSULTING GROUP CORPORATION**

Location and Description of Lead-Based Paint	Recommended Action	Estimated Cost
Exterior - Side A through Side D - white wood fascias and trim boards	Cover with tyvek and aluminum/vinyl.	\$1,350
Exterior - Side A - white wood attic air vent	Cover with tyvek and aluminum/vinyl.	\$175

**Note: The exterior soffits, crown moldings, trim boards/freeze boards and window casings, headers, sills, lintel covers and metal lintels are coated with lead-containing paint. These components may have been originally painted with lead-based paint and scraped and re-painted at a later time. These items may also have been painted with paint that contained levels of lead below 1.0 mg/cm<sup>2</sup>.**

Note: Based on HUD guidelines, the sides of the house, including the windows, doors, and cabinets, are identified by letter. The A-side of the house is the side facing the road and is typically the location of the main entrance door to the house. The remaining three sides of the house are denoted with letters B through D moving clockwise from the front of the house. Exterior windows throughout the house are additionally identified by a number, beginning with number one, which identifies the window on the farthest right side of the exterior wall. The next window moving toward the left is window two, etc. Thus, the far right window on wall A or A-side is window A1, the second window moving to the left is A2, the third window is A3, etc. When windows exist on a second floor, the window label will have the floor number in front of the letter. Thus, the farthest right window on the second floor wall A or A-side is 2A1. Exterior doors are identified with the same numbering system. Interior doors and windows are numbered similarly, however the numbering is specific to the room. Thus, several rooms may have door A1 which would be the far left door on wall A or A-side (when looking at the room from the front of the house). Also, lead-based paint may exist under an exposed substrate. Thus, if a substrate is identified as containing lead-based paint, yet is unpainted, lead-based paint may exist beneath the exposed substrate (i.e., paint under vinyl siding).

**Roy Consulting Group recommends that a lead-based paint project design be completed by a North Carolina certified lead-based paint project designer prior to completion of any lead remediation and/or abatement work.**

Paint films usually have varying amounts of lead on what appears to be a homogeneous painted area. Caution should always be used during demolition or renovation operations to prevent potential lead exposure. Additionally, mechanical disturbance (sanding, grinding, etc.) of the lead-based paint or lead-containing paint should be avoided.

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CHARLOTTE, NORTH CAROLINA 28210  
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February 4, 2010

Ms. Irene Agapion-Palamaris  
ARCO Realty Company  
625 South Elm Street  
Greensboro, North Carolina 27406

Subject: **LEAD-BASED PAINT REMEDIATION PLAN  
400 BERRYMAN STREET, UNIT N  
GREENSBORO, NORTH CAROLINA 27405  
ROY CONSULTING GROUP CORPORATION PROJECT #38-060509**

Dear Ms. Agapion-Palamaris:

As authorized by the contract between ARCO Realty Company and Roy Consulting Group Corporation (Roy Consulting Group) dated June 5, 2009, we are pleased to submit this Lead-Based Paint Remediation Plan for the subject property location. The plan summarizes our lead-based paint remediation recommendations based on the data collected and documented in the Lead-Based Paint Inspection and Risk Assessment Report dated August 27, 2009.

**1.0 INTRODUCTION**

The subject property is a single-story, brick exterior, multi-unit, residential apartment complex with asphalt shingle roof and crawlspace. The inspection and risk assessment services were limited to Unit N. The date of construction is unknown, and the apartment was vacant at the time of the inspection.

**2.0 RECOMMENDED ACTIONS AND COST ESTIMATE**

Lead-based paint was identified at the subject property during the inspection. We recommend the following work be completed as listed below.

## **Exhibit A**