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U.S. EPA REGION 1
HEARING CLERK

Attachment A
Supplemental Environmental Project Scope of Work
In the Matter of J. DaSilva Properties, LLC
Docket Number TSCA-01-2024-0033

1. **Description of Project:** DaSilva Properties (“Respondent”) shall spend approximately \$44,453.91 performing lead abatement in target housing owned by Respondent located at the addresses listed below in Danbury, Connecticut. Pursuant to the Supplemental Environmental Project (“SEP”), Respondent shall abate components containing lead-based paint and/or lead based paint hazards in target housing in compliance with applicable lead-based paint abatement regulations. The SEP consists of lead abatement work including:
- a. Remove, properly dispose and replace front entrance exterior doors, casings, and jambs at 34-38 Keeler Street; and
 - b. Remove, properly dispose and replace baseboards at 8-10 Tower Place.

All of the above components listed at 8-10 Tower Place and 34-38 Keeler Street, which is the subject of this abatement SEP, contain lead-based paint above 1.0 milligram/cm². Respondent shall hire a licensed lead abatement contractor, who will carry out the lead-based paint abatement SEP described above in the following target housing located at:

8-10 Tower Place	Estimate	Tax	Total
Cost	\$4,975	\$315.91	\$5,290.91
Disposal	\$2,985	\$189.55	\$3,174.55
Clearance	\$1,010.00	\$64.14	\$1,074.14
		Total	\$9,539.60

8-10 Tower Place:

- Apartment E (Bedroom 2): Five (5) wooden baseboards will be removed properly disposed and replaced. The baseboards will be painted and primed.
- Apartment E (Bedroom 3): Four (4) wooden baseboards will be removed properly disposed and replaced. The baseboards will be painted and primed.
- Apartment H (Living Room): Five (5) wooden baseboards will be removed properly dispose and replaced. The baseboards will be painted and primed.

- Disposal costs are estimated and will include one (1) Disposal Gaylord Box and disposal at a waste treatment facility.

Cost Breakdown:

- The cost of \$4,975, noted above, includes (a) the removal and installation of the baseboards, and (b) painting and priming the baseboards. See Exhibit B.

34-38 Keeler Street	Estimate	Tax	Total
Cost	\$14,875	\$944.56	\$15,819.56
Disposal	\$5,970	\$379.10	\$6,349.10
Clearance	\$845.00	\$53.66	\$898.66
		Total	\$23,067.32

34-38 Keeler Street:

- Unit 34L (Front Entrance, Side A): Remove and properly dispose exterior door system (door, casing, and jamb) and replace with pre-hung door and new casing and paint white.
 - Unit 34J (Front Entrance, Side A): Same as above.
 - Unit 36F (Front Entrance, Side A): Same as above.
 - Unit 36G (Front Entrance, Side A): Same as above.
 - Unit 38 (Front Entrance, Side A): Same as above.
- Disposal costs are estimated and will include two (2) Disposal Gaylord Boxes and disposal at a waste treatment facility.

Cost Breakdown:

- Cost per door: Each door cost \$1,356.76 (excluding tax) and was purchased from Ring's End (Totals: \$7,197.60 for all five doors, including tax, which cost is included below as "Materials for Exterior Doors").
- Cost to remove and install exterior doors: \$14,875 (included in proposal and in the above chart), which is approximately \$2,975 per door system.

The cost estimates are based on four documents submitted to EPA by Respondent.

- Lead-Based Paint Abatement Plan for 8-10 Tower Place, dated October 4, 2023 (Exhibit A).
- Lead Abatement Proposal for 8-10 Tower Place, dated October 25, 2023 (Exhibit B).
- Lead-Based Paint Abatement Plan for 34-38 Keeler Street, dated October 4, 2023 (Exhibit C).
- Lead Abatement Proposal for 34-38 Keeler Street, dated October 25, 2023 (Exhibit D).

These cost estimates were based on (a) dust wipe samples collected by Anthony Rountos, Public Health Inspector, of the City of Danbury, and (b) lead-based paint inspection conducted on August 3 and 4, 2023, utilizing XRF testing methodology. See Exhibits A and C.

The total cost estimate for abatement at the two properties is \$32,606.91. Other SEP costs under this CAFO include:

SEP Costs	Total
Big East Abatement Plans	2,400
Big East Lead Paint Management Plan for 8-10 Tower Place	1,250
Material for doors	7,197
Relocation costs for tenants	1,000
Abatement costs	32,606.91
Total	\$44,453.91

2. **Standard of Care:** The SEP shall be performed in accordance with the Lead Abatement Plans and Lead Abatement Proposals prepared by Respondent’s consultants. The SEP work is subject to review and inspection by EPA, as well as clearance inspections.

3. **Schedule:** Respondent shall complete the SEP on the following schedule:

- a. At least five (5) days prior to commencement of any lead abatement work, Respondent shall provide to EPA copies of licenses or certifications for all individuals and/or firms that will conduct lead abatement in fulfillment of the SEP requirements.
- b. 34-38 Keeler Street: Work to commence no later than May 20, 2024, and to be completed by July 26, 2024 (“SEP Completion Date”);
- c. 8-10 Tower Place: Work to commence no later than May 20, 2024, and to be completed by July 26, 2024;
- d. *Provided, however*, that time to complete the work at both properties is subject to any unforeseen delays or issues.
- e. EPA may, in its sole discretion, extend the SEP Completion Date for good cause shown by Respondent in writing.

4. **SEP Reports**

a. SEP Progress Report. Respondent shall submit to EPA a SEP Progress Report no later than June 21, 2024. Respondent shall submit to EPA a SEP Progress Report containing the information specified in Paragraph 62.a of the CAFO.

b. SEP Completion Report. Within thirty (30) days of completing the SEP and no later than August 26, 2024, Respondent shall submit to EPA a SEP Completion Report containing the information specified in Paragraph 62.b of the CAFO. EPA may, in its sole discretion, extend the due date of the SEP Completion Report for good cause shown by Respondent in writing.

5. **Compliance with Applicable Laws.** The completion of the SEP discussed in this Scope of Work shall not relieve the Respondent of its obligations to comply with all applicable provisions of federal, state, or local law.

6. **Submissions.** Respondent shall submit all SEP notices and reports required by this CAFO and SOW to:

Carley S. Cascione, Lead Inspector
Toxics, Pesticides & Drinking Water Compliance Section
US EPA Region 1 (New England)
5 Post Office Square, Suite 100
Mail Code: 05-MI
Boston, MA 02109-3912
Phone: 617-918-1324
Fax: 617-918-0324
cascione.Carley@epa.gov

and

Peter DeCambre, Senior Enforcement Counsel
U.S. Environmental Protection Agency, Region 1
5 Post Office Square, Suite 100
Mail Code: 4-WC
Boston, MA 02109-3912
decambre.peter@epa.gov