

22.18(b)(3) of the Consolidated Rules of Practice, is an appropriate means of resolving this matter without further litigation.

FINDINGS OF FACT AND CONCLUSIONS OF LAW

1. Respondent is Kascon, LLC (“Kascon” or “Respondent”).
2. Respondent’s primary place of business is located at 2930 Mason Road, Waterville, New York 13480.
3. Respondent is a general contractor engaged in the business of providing environmental services for asbestos detection and removal, mold remediation, lead detection and removal, and home improvement projects.
4. Respondent is a “firm,” as that term is defined at 40 C.F.R. § 745.8, with EPA Certification No. NAT-F111844-1, valid from 4/2/2013 to 4/16/2018.
5. Respondent is subject to the regulations and requirements pertaining to lead-based paint promulgated pursuant to Subchapter IV of TSCA, 15 U.S.C. §§ 401 – 412, 15 U.S.C. §§ 2681 – 2692, and set forth at 40 C.F.R. Part 745
6. On or about August 5, 2015, duly authorized inspectors of the United States Environmental Protection Agency, Region 2 (“EPA”), conducted an inspection and records review of Joseph Priore Construction (“JPC”), (the “Inspection”). During the course of the Inspection, EPA learned that JPC subcontracted to Respondent all asbestos and lead-based paint work associated with a project at the John F. Hughes Elementary School in Utica, New York (the “Property”), a child-occupied facility, as that term is defined at 40 C.F.R. § 745.83.
7. Respondent conducted lead-based paint renovations at the Property from April 8, 2015 through July 19, 2015.

8. On or about August 26, 2015 and February 10, 2016, EPA issued Information Request Letters (“IRLs”) to Respondent requesting information about the school project and the activities involving lead-paint that Respondent had conducted at the Property.

9. On or about September 25, 2015 and March 15, 2016, Respondent submitted responses to the respective IRLs which indicated that Respondent had performed work subject to the requirements set forth at 40 C.F.R. Part 745, Subpart E (the “Renovation, Repair and Painting (RRP) Rule”) at the Property.

10. Based in part on Respondent’s response to the second IRL, EPA determined that Respondent had failed, within sixty days prior to beginning renovation activities, to provide the owner or an adult representative of the child-occupied facility with the EPA-approved lead hazard information pamphlet, as required by 40 C.F.R. § 745.84(c)(1)(i) and (ii).

11. EPA further determined that Respondent had failed to provide the parents and/or guardians of children using the child-occupied facility with the EPA-approved lead hazard information pamphlet, information describing the general nature and information on how interested parents and guardians of children frequenting the child-occupied facility can review a copy of the records required by §745.86(c) and (d) or obtain a copy from the renovation firm at no cost, required by §745.84(c)(2) no more than sixty days before beginning renovation activities and in the manner prescribed by §§745.84(c)(2)(i) and (ii).

12. EPA further determined that Respondent had failed to establish and maintain records, or make available such records, as required by 40 C.F.R. § 745.87(b).

13. On April 26, 2017 and July 7, 2017, EPA and Respondent held informal pre-filing settlement conferences at Respondent’s request to discuss EPA’s findings with regard to Respondent’s failures to comply with TSCA and the RRP Rule before and during the renovation at the Property.

14. As a result of the informal settlement conferences, the parties agreed to enter into this Consent Agreement.

CONSENT AGREEMENT

Based on the foregoing, and pursuant to Section 16(a) of TSCA, 15 U.S.C. § 2615(a) and in accordance with the Consolidated Rules of Practice at 40 C.F.R. Part 22, it is hereby agreed by and between the parties hereto, and accepted by Respondent, that Respondent voluntarily and knowingly agrees to, and shall comply with, the following terms:

1. Respondent shall hereinafter maintain compliance with all applicable statutory provisions of TSCA, 15 U.S.C. § 2601 et seq. and its implementing regulations.
2. Respondent certifies that it is currently in compliance with the statutory provisions of Subchapter IV of TSCA, 15 U.S.C. §§ 401 – 412, 15 U.S.C. §§ 2681 – 2692 and the implementing regulations codified at 40 C.F.R. Part 745.
3. For the purposes of this Consent Agreement, Respondent: (a) admits that EPA has jurisdiction pursuant to Section 16(a) of TSCA, 15 U.S.C. § 2615(a) to commence a civil administrative proceeding for the violations described in the “Findings of Fact and Conclusions of Law” section, above; and (b) neither admits nor denies the specific factual allegations contained in the “Findings of Fact and Conclusions of Law” section, above.
4. Respondent shall pay, by cashier’s or certified check or electronic fund transfer, a civil penalty in the amount of **SEVEN THOUSAND ONE HUNDRED TWENTY-SIX DOLLARS (\$7,126)** due on or before **30 calendar days** from the date of signature of the Final Order at the end of this document.
5. If a payment is made by cashier’s or certified check, each such payment shall be payable to the "Treasurer of the United States of America." Each check shall be identified with

a notation of the name and docket number of this case, as set forth in the caption on the first page of this document. Such check shall be mailed to:

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

Alternatively, if Respondent chooses to pay by electronic fund transfer (“EFT”), Respondent shall provide the following information to its remitter bank:

- 1) Amount of Payment
- 2) SWIFT address: **FRNYUS33, 33 Liberty Street, New York, NY 10045**
- 3) Account Code for Federal Reserve Bank of NY receiving payment: **68010727**
- 4) ABA number: **021030004**
- 5) Field Tag 4200 of the Fedwire message should read “**D68010727
Environmental Protection Agency**”
- 6) Name of Respondent: **Kascon, LLC**
- 7) Case Docket Number TSCA-02-2017-9273

6. Payment must be received at the address listed in Paragraph 5, above, or the EFT must be received by the Federal Reserve Bank of New York, on or before the due date specified above (the date by which such payment must be received shall hereafter be referred to as the “due date”).

a. Failure to pay the full amount of the penalty, or any stipulated penalty demanded by EPA, according to the above provisions will result in the referral of this matter to the U.S. Department of Justice or the U.S. Department of the Treasury for collection or other appropriate action.

b. Further, if a payment is not received on or before its due date, interest will be assessed at the annual rate established by the Secretary of the Treasury pursuant to the Debt Collection Act, 31 U.S.C. § 3717, on the overdue amount from the due date through the date of payment. In addition, a late payment handling charge of \$15 will be assessed for each 30-day period (or any portion thereof) following the due date in which the balance remains unpaid.

c. A 6% per annum penalty also will be applied on any principal amount not paid within 90 days of the due date. Any such non-payment penalty charge on the debt will accrue from the date the penalty payment becomes due and is not paid.

7. The civil penalties and any stipulated penalties provided for herein are “penalt[ies] within the meaning of 26 U.S.C. § 162(f), and are not deductible expenditures for purposes of federal or state law.

8. Respondent has developed a Compliance Plan addressing the following broad categories of the RRP regulations and the lead-based paint abatement regulations codified at 40 C.F.R. Part 745 subparts E and L:

- a. Maintaining appropriate firm certification(s) from USEPA;
- b. Training of Kascon employees, when applicable;
- c. Creation and retention of records;
- d. Compliance with work practice standards for renovation and abatement projects; and
- e. Management of general contractor/subcontractor roles in renovation and abatement projects.

EPA has approved the Compliance Plan, appended to this CA/FO as Exhibit 1, and it is incorporated herein.

9. Respondent shall implement the Compliance Plan at all child-occupied facilities and/or target housing at which Respondent performs work subject to the provisions of 40 C.F.R. Part 745. Implementation of the Compliance Plan is intended as an adjunct to the requirements of 40 C.F.R. Part 745. Adherence to the provisions of the Compliance Plan and compliance with the provisions of this Consent Agreement with regard to its implementation and use shall not be

a substitute for compliance with the provisions of 40 C.F.R. Part 745 nor a defense to the failure to do so.

10. Respondent shall submit reports to EPA documenting its use and implementation of the Compliance Plan (CP Reports) in accordance with the following terms:

- a. Respondent shall submit CP Reports to EPA quarterly for a period of one year commencing ninety (90) days from the date of signature of the Final Order.
- b. Each report shall summarize compliance activities performed in accordance with the Compliance Plan during the preceding quarter. In addition, for RRP work conducted, the report shall indicate the number of RRP renovations undertaken during the relevant quarter. In the event that no work subject to the provisions of 40 C.F.R. Part 745 is undertaken in a given quarter, Respondent shall so state in the CP Report for that quarter.
- c. The CP Reports shall be sent to the following addressees:

U.S. EPA – Region 2
 Lead-Based Paint Team
 2890 Woodbridge Road - MS-225
 Edison, New Jersey 08837

And

Melva J. Hayden, Esquire
 Assistant Regional Counsel
 Office of Regional Counsel
 U.S. EPA – Region 2
 290 Broadway – 16th Floor
 New York, New York 10007-1866

- d. Respondent shall be subject to stipulated penalties for the failure to submit the required CP Reports in a timely manner as follows:

i.)	15 – 30 days delinquent	-	\$ 500 per day
ii.)	30 – 45 days delinquent	-	\$1000 per day
iii.)	45 – 60 days delinquent	-	\$1500 per day

All stipulated penalties are due and payable within thirty (30) calendar days of Respondent's receipt from EPA of a written demand for payment of the penalties. Payment of stipulated penalties shall be made in the same manner as prescribed in Paragraphs 5 and 6, above, for payment of the civil penalty. Stipulated penalties shall accrue as provided above, regardless of whether EPA has notified Respondent of the violation or has made a demand for payment, but need only be paid upon demand.

- e. Each CP Report shall contain the following certification signed by an appropriate corporate official:

"I certify under penalty of law that I have examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant potential penalties for submitting false information, including the possibility of fines and imprisonment."

11. EPA Region 2's Director of Division of Enforcement Compliance and Assistance, may in her sole discretion, reduce or eliminate any stipulated penalty due.

12. Delays:

a. If any unforeseen event occurs which causes or may cause delays in the submission of the CP Report as required herein, Respondent shall notify EPA in writing within fourteen (14) days of the delay or Respondent's knowledge of the anticipated delay, whichever is earlier. The notice shall describe in detail the anticipated length of delay, the precise cause of delay, the measures taken by Respondent to prevent or minimize delay, and any proposed adjustments to the timetable for the submission of the CP Report caused by the delay.

Respondent shall adopt all reasonable measures to avoid or minimize any such delay. Failure by Respondent to comply with the notice requirements of this paragraph shall render this paragraph

void and of no effect as to the particular event involved and may constitute a waiver of Respondent's right to request an extension of its obligation under this Consent Agreement based on such event.

b. If the parties agree that the delay or anticipated delay in the submission of the CP Report has been or will be caused by circumstances entirely beyond the control of Respondent, the time for performance hereunder may be extended for a period no longer than the Delay resulting from such circumstances.

c. In the event that EPA does not agree that a delay in implementing submitting the CP Report has been or will be caused by circumstances beyond the control of Respondent, EPA will notify Respondent in writing of its decision and any delays shall not be excused.

d. The burden of proving that any delay is caused by circumstances entirely beyond the control of Respondent shall rest with Respondent.

13. Any responses, documentation, and other communication submitted in connection with this Consent Agreement shall be sent to:

Vickie Pane
Lead Environmental Engineer
Pesticides and Toxic Substances Branch – Lead Team
Division of Enforcement and Compliance Assistance
U.S. Environmental Protection Agency – Region 2
2890 Woodbridge Avenue – MS 225
Edison, New Jersey 08837

And

Melva J. Hayden, Esquire
Assistant Regional Counsel
Office of Regional Counsel
U.S. Environmental Protection Agency – Region 2
290 Broadway, 16th Floor
New York, New York 10007-1866

Unless the above-named EPA contacts are later advised otherwise in writing, EPA shall address any written future correspondence (including any correspondence related to payment of the penalty) to Respondent at the following address:

Richard Oliver, COO
Kascon, LLC
2930 Mason Road
Waterville, New York 13480

14. This Consent Agreement is being voluntarily and knowingly entered into by the parties to resolve (conditional upon full payment of the civil penalty herein) the civil and administrative claims described in the Findings of Fact and Conclusions of Law set forth above.
15. Full payment of the penalty described in paragraph 4 shall only resolve Respondent's liability for federal civil penalties for the violations and facts described in paragraphs 10 through 12 in the Findings of Facts and Conclusions of Law. Full payment of this penalty shall not in any case affect the right of EPA or the United States to pursue appropriate injunctive or other equitable relief or criminal sanctions for any violation of the law.
16. Respondent has read the Consent Agreement, understands its terms, finds it to be reasonable, and consents to its issuance and its terms.
17. Respondent consents to the issuance of the accompanying Final Order.
18. Respondent agrees that all terms of settlement are set forth herein.
19. Respondent explicitly and knowingly consents to the assessment of the civil penalty as set forth in this Consent Agreement and agrees to pay the penalty in accordance with the terms of this Consent Agreement.
20. Respondent hereby waives its right to seek or to obtain any hearing pursuant to Subpart D of 40 C.F.R. Part 22 or other judicial proceeding on this Consent Agreement or on the Findings of Fact and Conclusions of Law herein or on the accompanying Final Order.

21. The Respondent agrees not to contest the validity or any term of this Consent Agreement and Final Order in any action brought: a) by the United States, including EPA, to enforce this Consent Agreement or Final Order; or b) to enforce a judgment relating to this Consent Agreement and Final Order. Any failure by Respondent to perform fully any requirement herein will be considered a violation of this Consent Agreement and Final Order, and may subject Respondent to a civil judicial action by the United States to enforce the provisions of this Consent Agreement and Final Order.

22. Respondent waives any right it may have to appeal this Consent Agreement and the accompanying Final Order.

23. This Consent Agreement and Final Order does not waive, extinguish, or otherwise affect Respondent's obligation to comply with all applicable federal, state, or local laws, rules, or regulations, nor shall it be construed to be a ruling on, or a determination of, any issue related to any federal, state or local permit. This Consent Agreement and Final Order does not waive, extinguish, or otherwise affect Respondent's obligation to comply with all applicable provisions of TSCA and the regulations promulgated thereunder.


24. The signatory for Respondent certifies that he or she is duly and fully authorized to enter into this Consent Agreement and all the terms and conditions set forth in this Consent Agreement.

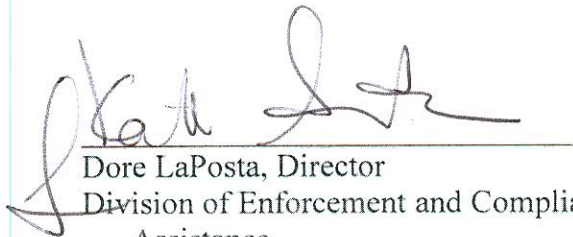
25. Each party hereto agrees to bear its own costs and fees in this matter.

26. Respondent consents to service upon it of a copy of this Consent Agreement and Final Order by an EPA employee other than the Regional Hearing Clerk.

In the Matter of Kascon, LLC
Docket Number TSCA-02-2017-9273

Kascon, LLC

RESPONDENT: BY: 
NAME: Dennis Keith
(PLEASE PRINT)
TITLE: Principal
DATE: 9/21/17

COMPLAINANT: 
Dore LaPosta, Director
Division of Enforcement and Compliance
Assistance
U.S. Environmental Protection Agency, Region 2
290 Broadway
New York, New York 10007-1866
DATE: SEP 26 2017

In the Matter of Kascon, LLC
Docket Number TSCA-02-2017-9273

FINAL ORDER

The Regional Administrator of the U.S. Environmental Protection Agency, Region 2, concurs in the foregoing Consent Agreement in the case of In the Matter of Kascon, LLC, bearing Docket Number TSCA-02-2017-9273. Said Consent Agreement, having been duly accepted and entered into by the parties, is hereby ratified, incorporated into, and issued as this Final Order. The effective date of this Order shall be the date of filing with the Regional Hearing Clerk of EPA - Region 2 (40 C.F.R. § 22.31(b)). This Final Order is being entered pursuant to the authority of 40 C.F.R. § 22.18(b)(3) and shall constitute an order issued under Section 16 of the Toxic Substances Control Act, 15 U.S.C. § 2615.


Catherine R. McCabe
Acting Regional Administrator
U.S. Environmental Protection Agency

DATE: 9/27/17

In the Matter of Kascon, LLC
Docket Number TSCA-02-2017-9273

CERTIFICATE OF SERVICE

I certify that I have on this day caused to be sent the foregoing Consent Agreement and Final Order, bearing the above-referenced docket number, in the following manner to the respective addressees below:

Original and one copy by hand to:

Office of the Regional Hearing Clerk
U.S. Environmental Protection Agency
290 Broadway, 16th Floor
New York, New York 10007-1866

Copy by Certified Mail Return Receipt Requested:

Dennis Keith, President
Kascon, LLC
2930 Mason Road
Waterville, New York 13480

Richard Oliver, COO
Kascon, LLC
2930 Mason Road
Waterville, New York 13480

Tim Lambrecht, Esquire
The Wladis Law Firm, PC
6312 Fly Road
East Syracuse, New York 13214

Dated: 9/28/17
New York, New York

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

“EXHIBIT 1”

LEAD PAINT REGULATIONS COMPLIANCE PLAN

“TABLE OF CONTENTS”

I. Introductory Statement1

II. Objective2

III. Applicability2

IV. Procedures2

A) Firm Certifications3

B) Training of KASCON, LLC Employees4-6

C) Records Retention6-7

**D) Managing General Contractor, Subcontractor Roles for RRP
 Rules and Lead Abatement Rules Projects7-8**

KASCON, L.L.C.
Environmental Services

2930 Mason Road
Waterville, NY 13480

Office: (315) 861-2211
Fax: (315) 861-2214
E-mail: kascon@frontiernet.net

“EXHIBIT 1”
LEAD PAINT REGULATIONS COMPLIANCE PLAN

“ATTACHMENTS”

ATTACHMENT “A” - “Renovate Right” Pamphlet Delivery Confirmation

- Record of Tenant Notification Procedures
- Lead Renovation Notice
- Lead Renovation Project Report (Pages 1 thru 3)

ATTACHMENT “B” - EPA Lead Renovator Certifications

ATTACHMENT “C” - EPA Lead Abatement Certifications

ATTACHMENT “D” - EPA Notification of Lead-Based Paint Abatement Activities

- Occupant Protection Plan for Lead Abatement
- Lead Abatement Report

“EXHIBIT 1”

LEAD PAINT REGULATIONS COMPLIANCE PLAN

I. Introductory Statement.

This Lead Paint Regulations Compliance Plan (“the plan”) is being implemented in order to promote compliance by KASCON, LLC with the requirements for Residential Property and Child Occupied Facility Renovation, codified at Title 40 of the Code of Federal Regulations, Part 745, Subpart E, commonly known as the Renovation, Repair, and Painting (RRP) Rule, and Part 745, Subpart L, commonly known as the Abatement Rule. The Plan is designed to help ensure that covered companies and their employees, engaged in renovation activities involving residential “target housing” properties and “Child Occupied Facilities” where lead-based paint is, or may be, present, have the necessary guidance and/or training to conduct renovation activities in compliance with the RRP Rule.

This plan will also show the procedures KASCON, LLC will follow when notifying the EPA of an upcoming Lead Abatement project, creating a “Occupant Protection Plan”, and producing a “Abatement Report” as per 40 CFR 745.227.

II. Objective

The objective of the plan is to ensure KASCON's compliance with the RRP Rule and other federal EPA Lead-Based Paint requirements where applicable. This plan does not address compliance with the residential lead-based paint laws or regulations of other federal, state, or local agencies.

III. Applicability

This plan covers all KASCON employees working on projects involving the Renovation, repair, or abatement of property originally constructed prior to 1978. Note, that in addition to pre-existing residential structures, the conversion of any class of property (e.g., Commercial, Industrial, etc.) constructed prior to 1978 to residential use makes such property subject to the requirements of 40 CFR Part 745 and this plan.

IV. Procedures

This document, created and adopted by KASCON, LLC sets forth procedures which will address the following broad categories of compliance that apply to the rules cited above: A) Updating/renewing the appropriate firm certifications by US EPA; B) Training of KASCON employees, when applicable; and C) Retention of records of compliance.

A) Firm Certifications.

RRP Rule – KASCON, LLC has updated its US EPA firm certification for the RRP Rule under certification number NAT-F111844-1, issued on April 02, 2013, which expires on April 16, 2018. Six (6) months prior to our license expiring, the EPA will send a reminder letter alerting us of the expiration date. We then take the necessary steps to renew our license. All renewals are now done electronically at www2.epa.gov/lead/epa-lead-safe-certification-program. Our individual Renovators certifications are kept in an electronic file database that is monitored by the KASCON, LLC Office Manager. As expiration dates near, Renovators are scheduled for a “Refresher” class at an EPA accredited training provider. Once training is complete, the proper forms are filed with the EPA so a new certification will arrive with no lapse in certified status for the individual Renovator. These certifications are all applied for electronically now as well.

Abatement Rule – KASCON, LLC has updated its US EPA firm certification for the Lead Based Paint Abatement Rule under certification number LBP-16130-1, issued on November 10, 2016, which expires on December 31, 2019. Six (6) months prior to our license expiring, the EPA will send a reminder letter alerting us of the expiration date. We then take the necessary steps to renew our license. All renewals are now done electronically at www2.epa.gov/lead/epa-lead-safe-certification-program. Our individual Supervisors certifications are kept in an electronic file database that is monitored by the KASCON, LLC

Office Manager. As expiration dates near, Abatement Supervisors are scheduled for a “Refresher” class at an EPA accredited training provider. Once training is complete, the proper forms are filed with EPA so a new certification will arrive with no lapse in certified status for the individual Supervisor. These certifications are all applied for electronically now as well.

B) Training of KASCON, LLC Employees.

1. RRP Rule – As a Prime Contractor / Sub-Contractor, whenever KASCON, LLC undertakes a project where lead renovation work is scheduled, it will assign an RRP Certified Renovator (appropriately trained individual who possesses a current Renovator certificate issued by an EPA accredited training provider) to that project. The assigned renovator to any project will be responsible, in part, for compliance with the RRP Rules for that project, and in that role must perform, and document, a number of specific job functions.

2. Assigned Renovator - All of KASCON, LLC’s core employees have been trained and certified by an EPA Certified training facility (See Attachment B). KASCON, LLC also provides annual in-house training/refresher classes for its EPA Certified employees. Having this vast number of employees certified allows KASCON the advantage of being able to place at least one Certified Renovator on all on our jobsites, whether or not there is any lead renovation scheduled for that particular project. If only one KASCON employee on a specific project is a certified renovator, he/she will be responsible for providing on-the-job training concerning Lead-Safe Work Practices required by the RRP Rule to the other KASCON employees. The certified renovator will create a record of this training, and KASCON, LLC will retain that record, as well as the other RRP records of compliance, including, but not

limited to, the Checklist for Regulated Renovations, written acknowledgment(s) pertaining to the receipt of the “Renovate Right” pamphlet, and any testing results (e.g., if a lead-free determination has been made), which will be completed for each project covered by this plan (See Attachment A). The KASCON, LLC Operations Manager will be responsible in assuring that all KASCON, LLC Certified Renovators attend the annual KASCON, LLC “In-House Lead Renovator Training” meeting. He will also be responsible for overseeing the day-to-day activities on each Lead Renovation project conducted by KASCON, LLC. At the completion of the project, the Certified Renovator assigned to the project that has completed all necessary project paperwork will meet with the KASCON, LLC Operations Manager so that all such paperwork can be reviewed and feedback given.

3. Abatement Rule – As a Prime Contractor / Sub-Contractor, whenever KASCON, LLC undertakes a project where lead abatement work has been scheduled, it will assign only an EPA Certified Lead Based Paint Abatement Supervisor to oversee the project, as well as either EPA Certified Lead Based Paint Abatement Supervisors or Workers to provide the labor for the project. The assigned Lead Based Paint Abatement Supervisor will be responsible for compliance with EPA Lead Based Paint Abatement Rules for that project, and in that role must perform, and document, a number of specific job functions.

4. Assigned Supervisor – A small contingent of KASCON, LLC employees are trained and certified as EPA Lead Based Paint Abatement Supervisors by an EPA Certified training facility (See Attachment C). As KASCON, LLC is rarely called upon to perform actual “Lead Abatement” work, the few Supervisors who hold this certification are more than enough to cover our needs. For any lead abatement work KASCON does engage in, one EPA Certified

Supervisor will have the role of "Project Supervisor", and the other Certified Supervisors will provide the labor for the project. It is the intent of KASCON, LLC to provide a portion of our workforce with the EPA Certified training to obtain their EPA Lead Based Paint Abatement Worker certifications this year. At least 5 business days prior to the start of any lead based paint abatement activities, KASCON, LLC will notify the EPA using the EPA "Lead Based Paint Abatement Activities" notification form (See Attachment D). The KASCON, LLC employee who has been trained and certified as an EPA lead based paint abatement supervisor, and has been designated as the "Project Supervisor" on any given jobsite, will be responsible for the preparation of the "Occupant Protection Plan" for that project. The "Occupant Protection Plan" will be unique to every individual residential dwelling or child-occupied facility and be developed prior to the commencement of abatement activities as covered in 40 CFR 745.227 (See Attachment D). The designated "Project Supervisor" will also be responsible for providing an "Abatement Report" which shall contain all of the required information found in 40 CFR 745.227 (See Attachment D).

C) Records Retention.

KASCON, LLC will establish and maintain the following records of compliance with the RRP Rule and the Abatement Rules:

- **RRP Rule** – minimum of 3 years after completion of activity
- **Abatement Rule** – minimum of 3 years after completion of activity

The maintenance of all such records shall be the responsibility of (1) the Operations Manager or (2) his designee, so long as the designee is a certified renovator , or certified abatement

supervisor, in his or her own right. If the specified documents are maintained in hard copy, all such documents covering all projects with RRP Rule requirements, or Lead Abatement Rule requirements, shall be maintained at KASCON, LLC's office 2930 Mason Road, New York in a central file dedicated to RRP Rule And Lead Abatement Rule documentation, with copies of the specified documents to be kept with the individual project files. If hard copy records are not maintained, the specified records shall be maintained in KASCON's database in a folder dedicated to RRP Rule, or Lead Abatement Rule documentation, with copies of the specified documents to be kept with the individual project files or folders. All electronic files containing the specific documents shall be backed up regularly and copies shall be maintained off-site, in the cloud or on some independent medium to prevent inadvertent loss or destruction of the data. Records shall be maintained in PDF format or another format to prevent modification of historical data. In the event of litigation, administrative investigation or action or other inquiries relating to KASCON, LLC's compliance with the RRP Rule or Lead Abatement Rule, all relevant data shall be preserved and all routine document deletion programs and/or document destruction protocols shall be disabled or suspended until the completion of the litigation, administrative investigation or action or inquiry.

D) Managing General Contractor/Subcontractor Roles for RRP Rules and Lead Abatement Rules Projects.

1. When KASCON, LLC serves as a general contractor, or as a subcontractor to another general contractor, KASCON will ensure RRP Rules and Lead Abatement Rules compliance (worker training, lead-safe work practices, etc.), create and retain all records of compliance (and

provide copies to whichever firm contracted the work to KASCON, LLC, as well as ensure information distribution (“Renovate Right” booklet (<https://www.epa.gov/lead/materials-and-downloads-renovators-renovation-repair-and-painting>), etc.) to the owner.

2. KASCON, LLC will not subcontract RRP Rule or Lead Abatement Rule projects to other firms.

Compliance Plan Authorization and Effective Date (attested by highest corporate officer)

KASCON, LLC

Dennis Keith, President _____
_____ **Date** **Signature**

KASCON, L.L.C.

Environmental Services

2930 Mason Road
Waterville, NY 13480

Office: (315) 861-2211
Fax (315) 861-2214
E-mail kascon@frontiernet.net

LEAD PAINT REGULATIONS COMPLIANCE PLAN

ATTACHMENT "A"

KASCON, L.L.C.
Environmental Services

2930 Mason Road
Waterville, NY 13480

Office: (315) 861-2211
Fax: (315) 861-2214
E-mail: kascon@frontiernet.net

"Renovate Right" Pamphlet Delivery Confirmation

Occupant Confirmation

Pamphlet Receipt

_____ I have received a copy of the lead hazard information pamphlet informing me of the potential risk of the lead hazard exposure from renovation activity to be performed in my dwelling unit. I received this pamphlet before the work began.

Printed Name of Owner-occupant

Address of Owner-occupant

Signature of Owner-occupant

Date Pamphlet Received

Renovator's Self Certification Option (for tenant-occupied dwellings only)

Instructions to Renovator: If the lead hazard information pamphlet was delivered but a tenant signature was not obtained, you may check the appropriate box below.

_____ **Declined** – I certify that I have made a good faith effort to deliver the lead hazard information pamphlet to the rental dwelling unit listed below at the date and time indicated and that the occupant declined to sign the confirmation of receipt. I further certify that I have left a copy of the pamphlet at the unit with the occupant.

_____ **Unavailable for signature** – I certify that I have made a good faith effort to deliver the lead hazard information pamphlet to the rental dwelling unit listed below and that the occupant was unavailable to sign the confirmation of receipt. I further certify that I have left a copy of the pamphlet at the unit by sliding it under the door or by (_____).

State how the pamphlet was left in the space above.

Printed Name of Person Certifying Delivery

Attempted Delivery Date

Signature of Person Certifying Lead Pamphlet Delivery

Unit Address

KASCON, L.L.C.

Environmental Services

2930 Mason Road
Waterville, NY 13480

Office: (315) 661-2211
Fax: (315) 661-2214
E-mail: kascon@frontierone.net

Record of Tenant Notification Procedures

Project Address _____

Street (apt. #) _____

City _____ **State** _____ **Zip Code** _____

Owner of multi-family housing _____ **Number of dwelling units** _____

Method of delivering notice forms (e.g. delivery to units, delivery to mailboxes of units) _____

Name of person delivering notices _____

Signature of person delivering notices _____ **Date of delivery** _____

KASCON.L.L.C.

Environmental Services

2930 Mason Road
Waterville, NY 13480

Office: (315) 861-2211
Fax: (315) 861-2214
E-mail: kascon@frontiernet.net

Lead Renovation Notice

For use in notifying tenants of renovations in common areas of multi-family housing.

The following renovation activities will take place in the following location:

Activity (e.g., sanding, window replacement)

Location (e.g., lobby, recreation center)

The expected starting date is _____ and the expected ending date is _____.
Because this is an older building built before 1978, some of the paint disturbed during the renovation may contain lead. You may obtain a copy of the pamphlet, "Renovate Right", by telephoning me at (315) 861-2211. Please leave a message and be sure to include your name, phone number and address. I will either mail you a pamphlet or slide one under your door.

Date

Printed name of renovator

Signature of renovator

KASCON, L.L.C.

Environmental Services

2930 Mason Road
Waterville, NY 13480

Office: (315) 861-2211
Fax: (315) 861-2214
E-mail: kascon@frontier.net

Lead Renovation Project Report

Date and Location of Renovation: _____

Brief Description of Renovation: _____

Name of Assigned Renovator: _____

Name(s) of Trained Worker(s), if used: _____

**Name of Dust Sampling Technician,
Inspector, or Risk Assessor, if used:** _____

____ Copies of renovator and dust sampling technician qualifications (training certificates, certifications) on file.

____ Certified renovator provided training to workers on (check all that apply):

____ Posting of warning signs

____ Setting up plastic containment barriers

____ Maintaining containment

____ Avoiding the spread of dust to adjacent areas

____ Waste handling

____ Post-renovation cleaning

____ Test kit or test results from a EPA-recognized laboratory on collected paint chip sample, used by certified renovator to determine whether lead was present on components affected by renovation (identify method used, type of test kit used (if applicable), laboratory used to conduct paint chip analysis, describe sampling locations and results): _____

KASCON, L.L.C.

Environmental Services

2930 Mason Road
Waterville, NY 13480

Office: (315) 861-2211
Fax: (315) 861-2214
E-mail: kascon@frontier.net

Lead Renovation Project Report

- ___ Warning signs posted at entrance to work area.
- ___ Work area contained to prevent spread of dust and debris.
 - ___ All objects in the work area removed or covered (interiors)
 - ___ HVAC ducts in the work area closed and covered (interiors)
 - ___ Windows in the work area closed (interiors)
 - ___ Windows in and within 20 feet of the work area closed (exteriors)
 - ___ Doors in the work area closed and sealed (interiors)
 - ___ Doors in and within 20 feet of the work area closed and sealed (exteriors)
 - ___ Doors that must be used in the work area covered to allow passage but prevent spread of dust
 - ___ Floors in the work area covered with taped-down plastic (interiors)
 - ___ Ground covered by plastic extending 10 feet from work area – plastic anchored to building and weighed down by heavy objects (exteriors)
 - ___ Vertical containment installed if property line prevents 10 feet of ground covering, or if necessary to prevent migration of dust and debris to adjacent property (exteriors)
- ___ Waste contained on-site and while being transported off-site.
- ___ Work site properly cleaned after renovation.
 - ___ All chips and debris picked up, protective sheeting misted, folded dirty side inward, and taped
 - ___ Work area surfaces and objects cleaned using HEPA vacuum and/or wet cloth's or mops (interiors)
- ___ Certified renovator performed post-renovation cleaning verification (describe results, including the number of wet and dry cloths used): _____

KASCON, L.L.C.

Environmental Services

2930 Mason Road
Waterville, NY 13480

Office: (315) 861-2211
Fax: (315) 861-2214
E-mail: kascon@frontiernet.net

LEAD PAINT REGULATIONS COMPLIANCE PLAN

ATTACHMENT "B"

United States Environmental Protection Agency

This is to certify that



Kascon, L.L.C.

has fulfilled the requirements of the Toxic Substances Control Act (TSCA) Section 402, and has received certification to conduct lead-based paint renovation, repair, and painting activities pursuant to 40 CFR Part 745.89

In the Jurisdiction of:

All EPA Administered States, Tribes, and Territories

This certification is valid from the date of issuance and expires

April 16, 2018

NAT-F111844-1

Certification #

April 02, 2013

Issued On

Michelle Price

Michelle Price, Chief

Lead, Heavy Metals, and Inorganics Branch

Lead Safe, LLC

706 North Salina Street | Suite 301 | Syracuse, NY 13208

Phone: (315) 471-3210 | Fax: (315) 703-9637 | TF: (866) 487-9628

www.lead-safe.com

Certificate of Attendance and Successful Completion

. EPA Renovator Refresher - English

Per 40 CFR Part 745.225

Richard N. Oliver

6329 Barker Road | Oriskany Falls NY 13425

Certificate Number: R-R-91969-15-00130

Course Date: 09/29/2015

Examination Date: 09/29/2015

Expiration Date: 09/29/2020

Patrick E. Struble

09/29/2015

Training Manager / Principle Instructor

Date



Lead Safe, LLC

706 North Salina Street | Suite 301 | Syracuse, NY 13208
Phone: (315) 471-3210 | Fax: (315) 703-9837 | TF: (866) 487-9628

www.lead-safe.com

Certificate of Attendance and Successful Completion

EPA Renovator Initial - English

Per 40 CFR Part 745.225

Denver P Babowicz

6049 Hamlock Lane | Marcy NY 13103

Certificate Number: R-1-91969-15-00196

Course Date: 12/17/2015

Examination Date: 12/17/2015

Expiration Date: 12/17/2020

Patricia E Stroedel

12/17/2015

Date

Training Manager / Principle Instructor:



Lead Safe, LLC

706 North Salina Street, Suite 301 Syracuse, NY 13208
Phone: (315) 471-3210 Fax: (315) 708-9637 T/F: (666) 487-6928

www.lead-safe.com

Certificate of Attendance and Successful Completion

EPA Renovator Initial - English

Per 40 CFR Part 745.925

Cody A. Bradley

7159 Route 2811, Suttville NY 13458

Certificate Number: R-I-91969-16-00080

Course Date: 04/01/2016

Examination Date: 04/01/2016

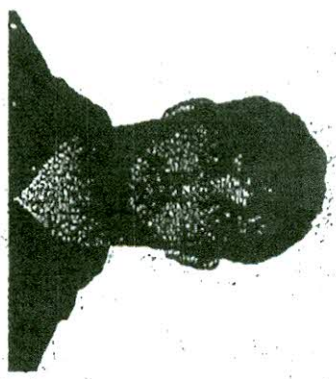
Expiration Date: 04/01/2021

Patricia E. Strickland

Training Manager / Principle Instructor

04/01/2016

Date



Lead Safe, LLC

706 North Salina Street | Suite 301 | Syracuse, NY 13208
Phone: (315) 471-3210 | Fax: (315) 703-9637 | TF: (866) 487-9628

www.leadtesting.net

Certificate of Attendance and Successful Completion

EPA Renovator Initial - English

Per 40 CFR Part 745.225

Alexander Briggs

1539 Oneida Street | PO Box 290 | Utica NY 13503

Certificate Number: R-1-91969-14-00034

Course Date: 03/25/2014

Examination Date: 03/25/2014

Expiration Date: 03/25/2019

Alexander Briggs

03/25/2014

Training Manager / Principle Instructor

Date



Lead Safe, LLC

706 North Salina Street | Suite 301 | Syracuse, NY 13208
Phone: (315) 471-3210 | Fax: (315) 703-9637 | TF: (866) 487-9628
www.leadtesting.net

Certificate of Attendance and Successful Completion

EPA Renovator Initial - English

Per 40 CFR Part 745.225

Keith J. Carroll

212 East Garden Street | Rome NY 13440

Certificate Number: R-I-91969-13-00082

Course Date: 05/03/2013

Examination Date: 05/03/2013

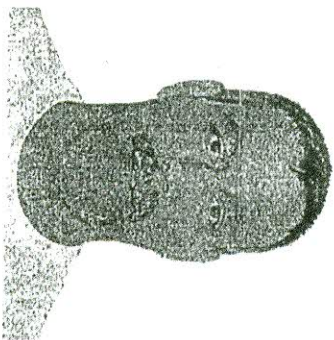
Expiration Date: 05/03/2018

Keith Carroll

05/03/2013

Training Manager / Principle Instructor

Date



Lead Safe, LLC

706 North Salina Street | Suite 301 | Syracuse, NY 13208

Phone: (315) 471-3210 | Fax: (315) 703-9637 | T/F: (866) 487-9628

www.lead-safe.com

Certificate of Attendance and Successful Completion

EPA Renovator Initial - English

Per 40 CFR Part 745.225

Jerrud S. Hirschey

19 Lakeview Terrace | Rochester NY 14613

Certificate Number: R-1-91969-15-00204

Course Date: 12/17/2015

Examination Date: 12/17/2015

Expiration Date: 12/17/2020

12/17/2015

Date

Training Manager / Principle Instructor

Alvin E. Strickland



Lead Safe, LLC

706 North Salina Street | Suite 301 | Syracuse, NY 13208

Phone: (315) 471-3210 | Fax: (315) 703-9637 | TF: (866) 487-9628

www.leadtesting.net

Certificate of Attendance and Successful Completion

EPA Renovator Initial - English

Per 40 CFR Part 745.225

Bryant M. Jones

2949 Mohawk Street | Saugquoit NY 13456

Certificate Number: R-1-91969-14-00037

Course Date: 03/25/2014

Examination Date: 03/25/2014

Expiration Date: 03/25/2019

Patrick E. Schroeder

03/25/2014

Training Manager / Principle Instructor

Date



Lead Safe, LLC

706 North Saina Street | Suite 301 | Syracuse, NY 13208
Phone: (315) 471-3210 | Fax: (315) 703-9637 | TF: (866) 487-9628
www.lead-safe.com

Certificate of Attendance and Successful Completion

. EPA Renovator Initial - English

Per 40 CFR Part 745.225

William D. Kolb

620 Strumlock Road | PO Box 226 | Poland NY 13431

Certificate Number: R-1-91969-15-00205

Course Date: 12/17/2015

Examination Date: 12/17/2015

Expiration Date: 12/17/2020

Patrick E. Strumlock
Training Manager / Principle Instructor

12/17/2015
Date



Lead Safe, LLC

706 North Salina Street | Suite 301 | Syracuse, NY 13208

Phone: (315) 471-3210 | Fax: (315) 703-9637 | TF: (866) 487-9628

www.lead-safe.com

Certificate of Attendance and Successful Completion

. EPA Renovator Initial - English

Per 40 CFR Part 745.225

Adam J. Kiehn

1 Horseshoe Drive | PO Box 454 | Bridgewater NY 13313

Certificate Number: R-I-91969-15-00202

Course Date: 12/17/2015

Examination Date: 12/17/2015

Expiration Date: 12/17/2020

Patrick E. Strickland

12/17/2015

Training Manager / Principle Instructor

Date



Lead Safe, LLC

706 North Salina Street | Suite 301 | Syracuse, NY 13208

Phone: (315) 471-3210 | Fax: (315) 703-9637 | TF: (866) 487-9628

www.leadtesting.net

Certificate of Attendance and Successful Completion

EPA Renovator Initial - English

Per 40 CFR Part 745.225

Brian M. Millich

11962 Meekerville Road | Forestport NY 13338

Certificate Number: R-I-91969-13-00086

Course Date: 05/03/2013

Examination Date: 05/03/2013

Expiration Date: 05/03/2018

Brian M. Millich

Training Manager / Principle Instructor

05/03/2013

Date



Lead Safe, LLC

706 North Salina Street | Suite 301 | Syracuse, NY 13208

Phone: (315) 471-3210 | Fax: (315) 703-9637 | TF: (866) 487-9628

www.lead-safe.com

Certificate of Attendance and Successful Completion

. EPA Renovator Refresher - English

Per 40 CFR Part 745.225

Chad B. Misiaszek

900 Valentine Avenue | Rome NY 13440

Certificate Number: R-R-91969-15-00125

Course Date: 09/17/2015

Examination Date: 09/17/2015

Expiration Date: 09/17/2020

Patrick E. Stronach

09/17/2015



Training Manager / Principle Instructor

Date

Lead Safe, LLC

706 North Salina Street | Suite 301 | Syracuse, NY 13208
Phone: (315) 471-3210 | Fax: (315) 703-9637 | TF: (866) 487-9628

www.leadtesting.net

Certificate of Attendance and Successful Completion

EPA Renovator Initial - English

Per 40 CFR Part 745.225

Stephen D. Owen

1988 Gorton Lake Road | West Edmeston NY 13485

Certificate Number: R-I-91969-14-00039

Course Date: 03/25/2014

Examination Date: 03/25/2014

Expiration Date: 03/25/2019

Alvin E. Stovall

Training Manager / Principle Instructor

03/25/2014

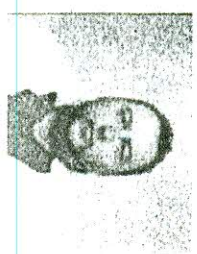
Date



EEA
ENVIRONMENTAL EDUCATION ASSOCIATES
888 4 ENV EDU environmentaleducation.com

This Certifies that on November 22, 2013

Mikhail Tur
1303 Oak St./Utica, NY 13502



Attended and successfully completed the 8 hour

EPA/HUD Model Certified Lead Renovator Initial Course - English

This program is based on "Lead Safety for Renovation, Repair, and Painting"
Per 40 CFR Part 745.225

Certificate Number: R-I-8889-13-00546

Examination Date: 11/22/13

Issue Date: 11/22/13

Expiration Date: 11/22/18

A handwritten signature in black ink, appearing to read "Andrew McLellan".

Andrew McLellan, President

A handwritten signature in black ink, appearing to read "Lindsay Harris".

Lindsay Harris, Assistant Training Coordinator

Headquarters
346 Austin St., Buffalo, NY 14207

Lead Safe, LLC

706 North Salina Street | Suite 301 | Syracuse, NY 13208
Phone: (315) 471-3210 | Fax: (315) 703-9637 | TF: (866) 487-9628

www.leadtesting.net

Certificate of Attendance and Successful Completion

EPA Renovator Initial - English

Per 40 CFR Part 745.225

Grigory Verenich

424 McKennan Road | Herkimer NY 13350

Certificate Number: R-1-91969-14-00040

Course Date: 03/25/2014

Examination Date: 03/25/2014

Expiration Date: 03/25/2019

Patrick E. Stronohel
Training Manager / Principle Instructor

Patrick E. Stronohel
03/25/2014
Date



Lead Safe, LLC

706 North Salina Street | Suite 301 | Syracuse, NY 13208
Phone: (315) 471-3210 | Fax: (315) 403-3637 | TTY: (366) 487-6622

www.leadtesting.net

Certificate of Attendance and Successful Completion

EPA Renovator Initial - English

Per 40 CFR Part 745.225

Anthony J. Wood

45 Hakes Road | Ilion NY 13357

Certificate Number: R-1-91269-14-00001

Course Date: 03/25/2014

Examination Date: 03/25/2014

Expiration Date: 03/25/2019

Albino S. Stasiak

03/25/2014

Training Manager / Principle Instructor

Date



KASCON, L.L.C.

Environmental Services

2930 Mason Road
Waterville, NY 13480

Office: (315) 861-2211
Fax: (315) 861-2214
E-mail: kascon@frontiernet.net

LEAD PAINT REGULATIONS COMPLIANCE PLAN

ATTACHMENT "C"

United States Environmental Protection Agency

This is to certify that

Kascon, LLC.

has fulfilled the requirements of the Toxic Substances Control Act (TSCA) Section 402, and has received certification to conduct lead-based paint activities pursuant to 40 CFR Part 745.226

In the jurisdiction of:

All EPA Administered Lead-based Paint Activities Program States, Tribes and Territories

This certification is valid from the date of issuance and expires December 31, 2019

LBP-16130-1

Certification #

November 10, 2016

Issued On

Michelle Price

Michelle Price, Chief

Lead, Heavy Metals, and Inorganics Branch



CNY Environmental Institute, Inc.

706 North Salina Street, Suite 301, Syracuse, New York 13208

Phone: (315) 703-0153 Fax: (315) 703-9637 Toll Free: (866) 361-4777

www.cnyenvi.org

CERTIFICATE OF ATTENDANCE
and
SUCCESSFUL COMPLETION

EPA LEAD SUPERVISOR REFRESHER - ENGLISH

PER 40 CFR PART 745.225

RICHARD N. OLIVER
6329 BARKER ROAD
ORISKANY FALLS, NY 14325

Course Date: **07/09/2015** | Exam Date: **07/09/2015**

Certificate Number: **LSR-9544-15-070902**



John E. Moran
Training Manager

07/09/2015
Date

CNY Environmental Institute, Inc.

706 North Salina Street, Suite 301, Syracuse, New York 13208
Phone: (315) 703-0153 Fax: (315) 703-9637 Toll Free: (866) 361-4777
www.cnyenv.org

CERTIFICATE OF ATTENDANCE
and
SUCCESSFUL COMPLETION

LEAD SUPERVISOR INITIAL-ENGLISH
PER 40 CFR PART 745.225

CHAD B. MISIASZEK
6289 COOPER STREET
VERONA, NY 13476

Course Date: **11/27/2016 - 12/01/2016** | Exam Date: **12/01/2016**
Interim Certification Expiration Date: **06/01/2017**

Certificate Number: **LS-9544-16-120102**



Robert Knudell
Training Manager

12/01/2016
Date

CNY Environmental Institute, Inc.

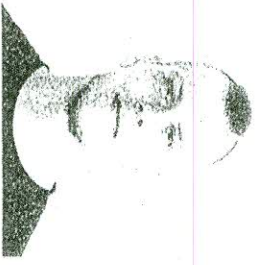
706 North Salina Street, Suite 301, Syracuse, New York 13208
Phone: (315) 703-0153 Fax: (315) 703-9637 Toll Free: (866) 361-4777
www.cnyenvi.org

CERTIFICATE OF ATTENDANCE
and
SUCCESSFUL COMPLETION
LEAD SUPERVISOR INITIAL-ENGLISH
PER 40 CFR PART 745.225

JERRUD S. HIRSCHHEY
19 LAKEVIEW TERRACE
ROCHESTER, NY 14613

Course Date: **11/27/2016 - 12/01/2016** | Exam Date: **12/01/2016**
Interim Certification Expiration Date: **06/01/2017**

Certificate Number: **LS-9544-16-120101**



Alan E. Studd
Training Manager

12/01/2016
Date

CNY Environmental Institute, Inc.

706 North Salina Street, Suite 301, Syracuse, New York 13208

Phone: (315) 703-0153 Fax: (315) 703-9637 Toll Free: (866) 361-4777

www.cnyenvi.org

CERTIFICATE OF ATTENDANCE
and
SUCCESSFUL COMPLETION

LEAD SUPERVISOR INITIAL-ENGLISH

PER 40 CFR PART 745.225

VASILYIY TUR
5 SHULL STREET
ILION, NY 13357

Course Date: **01/09/2017 - 01/12/2017** | Exam Date: **01/12/2017**

Interim Certification Expiration Date: **07/12/2017**

Certificate Number: **LS-9544-17-011205**



Training Manager

Paul S. Stovall

Date

01/12/2017

KASCON, L.L.C.

Environmental Services

2930 Mason Road
Waterville, NY 13480

Office: (315) 861-2211
Fax: (315) 861-2214
E-mail: kascon@frontiernet.net

LEAD PAINT REGULATIONS COMPLIANCE PLAN

ATTACHMENT "D"



U. S. ENVIRONMENTAL PROTECTION AGENCY

NOTIFICATION

OF LEAD-BASED PAINT ABATEMENT ACTIVITIES

Important: A representative of the certified firm may complete this sample form or a similar form when notifying EPA. Consult the *Instructions for Notifying EPA Commencement of Lead-Based Paint Abatement Activities* when preparing abatement notification. **Please type or print responses in black or blue ink only.**

A. Type of Notification Please indicate the type of notification.

Original Updated Cancellation

B. Emergency Notification No Yes, if yes include documentation showing evidence of an EBL determination or a copy of the Federal/State/Tribal/Local emergency abatement order.

C. Activity Start and End Dates Specify the dates you will begin and end lead-based paint activity.

If necessary, estimate end date using your best professional judgment. Start date: _____ End date: _____
Month/Day/Year Month/Day/Year

D. Description of Activity This section relates to the building where abatement work will be performed.

Type of Building: Single Family Dwelling Multi-Family Dwelling Child-Occupied Facility

Property name (if applicable): _____

Property Address including apartment and/or unit number(s): _____

Street Address City State Zip Code

Square footage/acreage to be abated: _____

Please write a brief description of abatement project to be performed. (Enclose additional paper if necessary)

E. Firm Information

Name: _____ Firm's Certification Number: _____

Address: _____
Street Address City State Zip Code

Phone Number: _____

F. Certified Supervisor's Information

Name: _____

EPA Certification Number: _____ (Check here if working under interim certification and enter the identification number from your course completion certificate in this space)

G. Firm Affirmation Please note that this form is incomplete without a signature.

I hereby attest and affirm that the information included on this notification form is true and accurate to the best of my belief and knowledge. I acknowledge that any approval authorized pursuant to this notification will be subject to revocation if issuance was based on incorrect or inadequate information that materially affected the decision to issue the approval.

Name: _____ Title: _____

Signature: _____ Date Signed: _____

For information on EPA and other lead programs, see the web site:
<http://www.epa.gov/lead/>

KASCON, L.L.C.

Environmental Services

2930 Mason Road
Waterville, NY 13480

Office (315) 861-2211
Fax (315) 861-2214
E-mail: kascon@frontiernet.net

OCCUPANT PROTECTION PLAN FOR LEAD ABATEMENT

1. Location of Project:

This job will take place at the residence/project site located at _____

(full address).

A previous lead inspection of this residence was performed by _____

(Name and address of Inspection or Risk Assessment firm)

(Location and name of all building components to be treated)

- | | |
|----------|-----------|
| 1. _____ | 2. _____ |
| 3. _____ | 4. _____ |
| 5. _____ | 6. _____ |
| 7. _____ | 8. _____ |
| 9. _____ | 10. _____ |

These building components are coated with lead-based paint and represent a hazard to workers who may disturb it during lead hazard control, renovation, and maintenance activities.

The following work practices shall be restricted during abatement:

- (1) Open-flame burning or torching of lead-based paint is prohibited;
- (2) Machine sanding or grinding or abrasive blasting or sandblasting of lead-based paint is prohibited unless with High Efficiency Particulate Air (HEPA) exhaust control which removes particles of less than 0.3 microns or larger from the air at 99.97 percent or greater efficiency;
- (3) Dry scraping of lead based paint is permitted only in conjunction with heat guns or around electrical outlets or when treating defective paint spots totaling no more than 2 square feet in any one room, hallway or stairwell, or totaling no more than 20 square feet on exterior surfaces;
- (4) Operating a heat gun on lead-based paint is permitted only at temperatures below 1100 degrees Fahrenheit.

2. Schedule:

This project is expected to start on _____ (date) and end on _____ (date).
This compliance plan will take effect immediately on _____ (date). The competent person will conduct worksite visual inspections on a daily basis.

Work will proceed according to the following schedule:

Day 1: Initial setup, followed by:

_____ (name all tasks to be completed)

Daily cleanup: wet mopping, HEPA vacuuming

Day 2: (Tasks)

Day 3: (Tasks)

Day 4: Final cleanup and clearance examination

3. Equipment and Materials

HEPA vacuums, cleaning detergents, protective clothing, cotton work gloves, electric power saws, hammers, wrecking bars, pry bars, screwdrivers, plastic sheeting, metal scrapers, compressed air-powered water pumps, rollers, brushes, Nitrile rubber gloves, respirators, cutting shears, mops, paintbrushes, paint rollers.

4. Crew:

The work will be completed by a crew of _____ (insert number) workers. Crew assignments are as follows:

Crew 1 _____ (name) _____ (task)

Crew 2 _____ (name) _____ (task)

Crew 3 _____ (name) _____ (task)

5. Competent Person:

_____ (Name), a certified lead abatement supervisor, will be onsite at all times and will act as the competent person for occupational health and safety issues. The lead supervisor license (or certificate) number is: _____. The lead supervisor will conduct daily inspections of the work areas to ensure that control measures, work practices, personal protective equipment, and hygiene facilities are used as prescribed in this document.

6. Control Measures:

The primary control methods for this project are (check all that apply):

_____ method substitution (building component replacement, enclosure)

_____ wet methods

_____ wrapping materials to be discarded in plastic

_____ respiratory protection

_____ local exhaust ventilation (needle guns, vacuum blasting)

_____ general room ventilation

_____ on-the-job training

_____ HEPA vacuums

_____ containment (use of plastic barriers)

7. Description of Job:

Work practices should follow work site prep levels as excerpted from HUD's worksite preparation tables 8.1, 8.2, 8.3 from Guidelines for the Evaluation & Control of Lead Based Paint Hazards in Housing Chapter 8.

This job will involve the following lead hazard reduction measures (complete all that apply):

Replacement of _____ (name all components)

Enclosure of _____ (name all components)

Paint removal of _____ (name all components)

Encapsulation of _____ (name all components)
Paint film stabilization of _____ (name all components)
Friction surface treatments of _____ (name all components)
Impact surface treatments of _____ (name all components)
Dust removal in the following areas _____ (name all areas)

8. Technology Considered in Meeting the Permissible Exposure Limit:

The HUD Guidelines for Evaluation and Control of Lead Hazards in Housing and Protecting Workers and Their Communities from Lead Hazards: A Guide for Protective Work Practices, published by the Society of Occupational and Environmental Health, and other publications were reviewed to determine the appropriate engineering controls to be used in this project. The only specialized equipment utilized for this project are HEPA-filtered vacuum cleaners and _____ (name all equipment).

9. Respirators:

All individuals in the work area will be provided with a NIOSH-approved half-mask, air-purifying respirator equipped with HEPA cartridges or a powered air-purifying respirator (if so requested).

Respirators will be provided in the context of a complete respiratory protection program; a copy of the respiratory protection program can be found in the project supervisor's paperwork box, or a copy can be received if requested from the KASCON, LLC home office.

Respirators will be required during (name phases of job for which respirators will be required):

Respirator use during other activities, including initial setup (laying down plastic for containment), and enclosure and encapsulation after surface preparation is not necessary, unless other workers nearby (same interior room or exterior wall) are performing activities for which respirators are required.

10. Protective Clothing:

Disposable protective clothing will be worn at all times inside the work area. Protective clothing will be made of breathable fabric to reduce the potential for workers heat stress. If visibly contaminated with dust or paint chips, protective clothing will be vacuumed off before it is removed.

11. Hygiene Facilities:

Hand washing facilities will be used to decontaminate workers, since leaded dust levels are expected to be low. Showers are used on jobs that generate high lead dust levels. The facilities will be located in a portable trailer. The trailer will contain a shower area, a hot water supply (tank), a waste water collection drum, a lined drum for used disposable clothing, soap and towels, an separate area to don clean disposable clothing before work begins, and a separate area to doff used disposable clothing when the work shift is over. These areas along with the shower area will be separated by plastic curtain doorways. Hands and face will be washed before all breaks and at the end of the work shift. Waste water will be collected, pretreated onsite with filtration, and disposed of in accordance with prior arrangements made with _____ (name of local water and sewage authority).

12. Training:

The following workers have been trained using the EPA Training Curriculum. The training was conducted by _____ (name, address, and phone number of training provider)

Trainees

Last 4 SS #

Plan completed by:

_____ (name and signature)

_____ (date)

KASCON, L.L.C.

Environmental Services

2930 Mason Road
Waterville, NY 13480

Office: (315) 861-2211
Fax: (315) 861-2214
E-mail: kascon@frontiernet.net

LEAD ABATEMENT REPORT

- 1) Start and completion dates of abatement.
Start date: _____
Completion date: _____

 - 2) The name and address of each certified firm conducting the abatement and the name of each supervisor assigned to the abatement project.
Firm name: _____
Firm address: _____
Supervisor's name: _____

 - 3) The "Occupant Protection Plan". (See attached)

 - 4) The name, address, and signature of each certified risk assessor or inspector conducting clearance sampling and the date of clearance testing.
Certified Risk Assessor/Inspector address: _____
Certified Risk Assessor/Inspector signature: _____
Date of clearance testing: _____

 - 5) The results of clearance testing and all soil analysis (if applicable) and the name of each recognized laboratory that conducted the analysis.
Clearance results: _____ (See attached)
Laboratory name: _____

 - 6) A detailed written description of the abatement, including the abatement methods used, locations of rooms and/or components where abatement occurred, reason for selecting particular abatement methods for each component, and any suggested monitoring of encapsulants or enclosures. (Attach additional sheets if needed)
-