# Clay Point Associates, Inc.

www.claypointassociates.com



May 14, 2019

Town of Starksboro c/o Jerusalem School Committee, Attn: Susan Klaiber 2849 VT Route 116 Starksboro, Vermont 05487

Re: Report of Limited Lead-Based Paint Inspection

Jerusalem Schoolhouse, 397 Jerusalem Road, Bristol, Vermont

CPAI Project #14083

Dear Ms. Klaiber:

Enclosed for your review is the Clay Point Associates, Inc. (CPAI) report related to limited lead-based paint inspection activities performed on May 3 & 6, 2019 on/within the Jerusalem Schoolhouse at 397 Jerusalem Road, Bristol, Vermont. The inspection was performed in accordance with the guidelines outlined in Chapter 7: Lead-Based Paint Inspection of the U.S. Department of Housing and Urban Development's, "Guidelines for the Evaluation and Control of Lead-Based Paint Hazards in Housing", July 2012 revision (HUD). This assessment was partially funded by a grant from the Preservation Trust of Vermont.

For your information, lead-based paint was detected on/within the structure.

On-site limited lead-based paint testing was performed by the use of a portable x-ray fluorescence analyzer (XRF). Specifically, a RMD Instruments, LLC., Lead Paint Analysis System (LPA-1), serial number #2471, was used by CPAI to inspect all accessible painted/stained surfaces. The XRF calibration was checked according to the manufacturer's recommendations and the guidelines outlined in the December 1, 2006, Performance Characteristic Sheet (PCS) for the above referenced instrument. In addition, precautionary measures were taken to ensure that building occupants, inspectors, and escorts were not inadvertently exposed to radiation as a result of testing.

Attached are copies of the "Lead-Based Paint Testing Data Sheets" generated during the inspection. The sheets reference locations in each room/area where representative XRF testing was performed. Walls in each room/area were assigned an A, B, C or D letter notation. The A Wall in each room/area is always at the street side of the building (Jerusalem Road). Notations then proceed clockwise from the A wall to the B, C and D walls. If more than one door or window is on one particular wall, the #1 door/ window is always on the inspector's left as s/he faces the wall. Notations then proceed left to right from 1, to 2, to 3, etc. Also attached is a drawing that provides room/area numbers.

Ms. Susan Klaiber May 14, 2019 Page 2

XRF readings are classified into two categories: positive (lead-based paint) and negative (not defined as lead-based paint). The appropriate category is noted in the far right column on the Lead-Based Paint Testing Data Sheets. The Vermont Regulations For Lead Control, V.S.A. Title 18, Chapter 38, Effective October 2, 1994, amended May 1, 2001, defines Lead-Based Paint in target housing and daycare facilities as "paint or other surface coatings that contain lead in excess of 1.0 mg/sq. cm. or 0.5 percent by weight (5,000 ppm), or (1) in the case of paint or other surface coatings such lower level as may be established by the Secretary of Housing and Urban Development, as defined by Section 302 (c) of the Lead Based Paint Poisoning Prevention Act, or (2) in the case of any other paint or surface coatings, such other level as may be established by the Administrator of EPA." The Vermont Occupational Safety and Health Administration (VOSHA) does not specify a regulated quantity of lead within paint. Applicable VOSHA regulations address the presence of lead within paint regardless of specific quantity present.

Please note that this document does not provide a comprehensive inventory of components with lead-based paint. This is because protocols do not require testing of every inch of a painted/stained surface.

Components with the same paint history as those tested may contain lead-based paint within each room or on the building exterior (i.e., under the currently visible paint layer). In addition, protocols do not require testing of more than one item from the same testing component within each room (i.e., if more than one window was present in a room, and if CPAI tested window components from one window and they were positive, then the same window components from the other windows in the room should be assumed to be positive).

Please be aware that in accordance with HUD and the U.S. Environmental Protection Agency (EPA) guidelines (24 CFR part 35 and 40 CFR part 745) a copy of this report must be provided to new lessees (tenants) and purchasers of this property before they become obligated under a lease or sales contract. The complete report must also be provided to new purchasers and it must be made available to new tenants. Landlords (lessors) and sellers are also required to distribute an educational pamphlet approved by the U.S. EPA and include standard warning language in their leases or sales contracts to ensure that parents have the information they need to protect their children from lead-based paint hazards.

All lead-based paint inspection activities were performed by Jennifer Richardson. Ms. Richardson is a State of Vermont certified Lead Inspector (#IT496486). Specific hours of onsite testing are available upon request.

Ms. Susan Klaiber May 14, 2019 Page 3

Thank you for the opportunity to service your professional environmental management needs. If you have any questions concerning this inspection report, or require additional services, please contact us at (802) 879-2600.

Sincerely, CLAY POINT ASSOCIATES, INC.

Jennifer Richardson Environmental Specialist

# Clay Point Associates, Inc.



www.claypointassociates.com

## **Calibration Check Test Results**

ADDRESS: Jerusalem Schoolhouse 397 Jerusalem Road Bristol, Vermont

DATE:	May 3, 2019
INSPECTOR:	Jennifer Richardson
XRF SERIAL NO.:	2471

Start Calibration Check (RMD Standard Block)								
Time:	Reading: Calibration							
	(mg./sq. cm.):							
08:39	01	0.8						
	02	0.8						
	03 0.8							
	Average:	0.8						

Start Calibration Check, Zero (Back of RMD Standard Block)								
Time:								
		(mg./sq. cm.):						
08:47	04	- 0.2						
	05 - 0.2							
	06 - 0.2							
	Average:	- 0.2						

End Calibration Check (RMD Standard Block)								
Time:	Reading: Calibration							
	(mg./sq. cm.):							
12:05	221	0.8						
	222	0.8						
	223 0.8							
	Average:	0.8						

Inspector Signature: \_

End Calibration Check, Zero (Back of RMD Standard Block)							
Time:	Reading: Calibration						
		(mg./sq. cm.):					
12:13	224	- 0.2					
	- 0.2						
	226	- 0.2					
	Average:	- 0.2					

Calibration Check Tolerance Used **1.0 mg./sq. cm.**XRF Calibration Check Limits: 0.7 mg./sq. cm. to 1.3 mg./sq. cm. (inclusive)

P.O. BOX 1254 • WILLISTON, VERMONT • 05495-1254 • 802-879-2600

# Clay Point Associates, Inc.



www.claypointassociates.com

## **Calibration Check Test Results**

ADDRESS: Jerusalem Schoolhouse 397 Jerusalem Road Bristol, Vermont DATE:
INSPECTOR: Jei

Jennifer Richardson

May 6, 2019

XRF SERIAL NO.: 2471

Start Calibration Check (RMD Standard Block)						
Time: Reading: Calibration (mg./sq. cm.):						
12:34	01	0.8				
	02	0.8				
03 0.8						
	Average:	0.8				

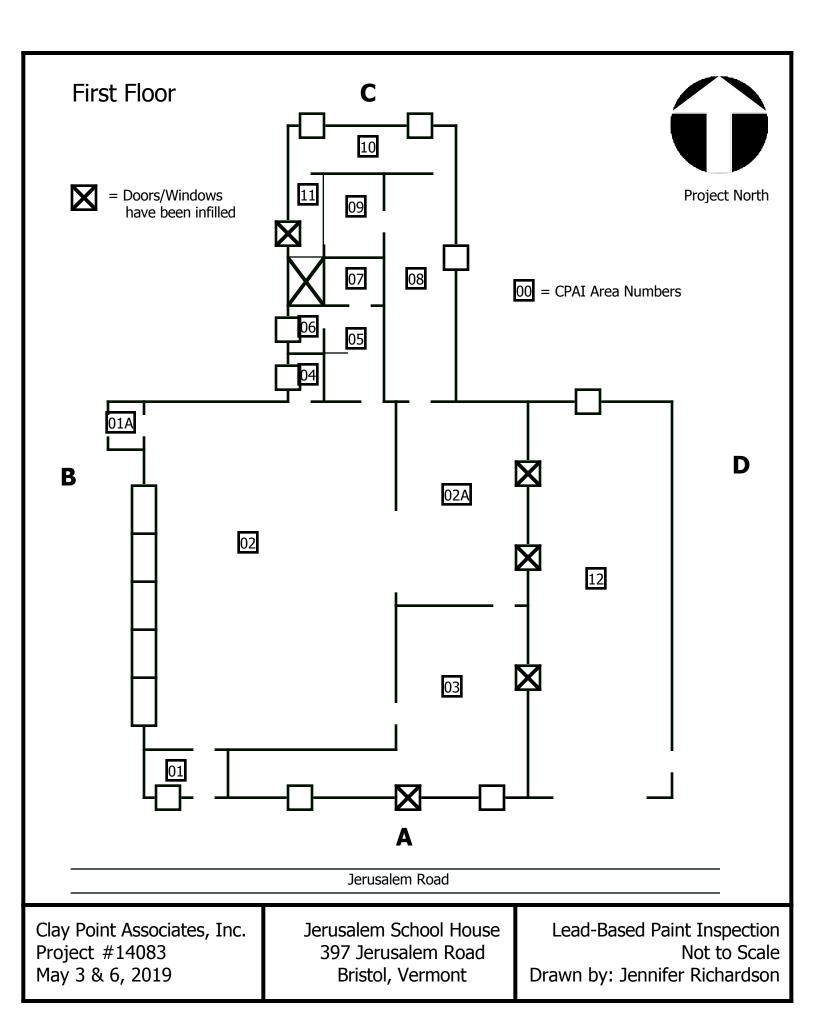
Start Calibration Check, Zero (Back of RMD Standard Block)								
Time:	Reading: Calibration							
		(mg./sq. cm.):						
12:42	04	- 0.2						
	05 - 0.2							
	06 - 0.2							
	Average:	- 0.2						

End Calibration Check (RMD Standard Block)								
Time:	Reading: Calibration							
	(mg./sq. cm.):							
13:30	70	8.0						
	71	0.8						
	72	0.8						
	Average:	0.8						

End Calibration Check, Zero (Back of RMD Standard Block)									
Time:	e: Reading: Calibration (mg./sq. cm.):								
13:38	73	- 0.2							
74 - 0.2									
	75 - 0.2								
	Average:	- 0.2							

Calibration Check Tolerance Used **1.0 mg./sq. cm.**XRF Calibration Check Limits: 0.7 mg./sq. cm. to 1.3 mg./sq. cm. (inclusive)

1945 Helialden





Clay Point Associates, Inc. P.O. Box 1254, Williston, VT 05495 (802) 879-2600

ADDRESS: 397 Jerusalem Road, Starksboro, Vermont Jerusalem Schoolhouse DATE: May 3, 2019

XRF SERIAL NO.: 2471 ROOM EQUIVALENT: 01 (Entry) INSPECTOR: Jennifer Richardson

READING	COMPONENT	COLOR	SUBSTRATE	COND.	TEST LOCATION/DESCRIPTION	XRF READING (mg/sq. cm)	CLASS
07	Ceiling	White	Wood	Deter.		8.0	POS.
08	Door	White	Wood	Deter.	Wall A, Door 1	0.6	Neg.
09	Header	White	Wood	Deter.	Wall A, Door 1	- 0.1	Neg.
10	Threshold	Stained	Wood	Deter.	Wall A, Door 1	- 0.1	Neg.
11	Door	White	Wood	Deter.	Wall C, Door 1	1.5	POS.
12	Door Casing	White	Wood	Deter.	Wall C, Door 1	3.6	POS.
13	Door Jamb	White	Wood	Deter.	Wall C, Door 1	9.4	POS.
14	Header	White	Wood	Deter.	Wall C, Door 1	3.6	POS.
15	Window Sill	White	Wood	Deter.	Wall A, Window 1	3.1	POS.
16	Window Apron	White	Wood	Deter.	Wall A, Window 1	2.9	POS.
17	Window Casing	White	Wood	Deter.	Wall A, Window 1	2.1	POS.
18	Window Stop	White	Wood	Deter.	Wall A, Window 1	1.0	POS.
19	Window Sash	White	Wood	Deter.	Wall A, Window 1	> 9.9	POS.
20	Cabinet	White	Wood	Deter.	Wall B	0.3	Neg.
21	Coat Rack	White	Wood	Deter.	Wall D	- 0.1	Neg.
22	Hangar Rod	Black	Metal	Deter.	Wall B	- 0.1	Neg.
23	H. Rod Support	White	Wood	Deter.	Wall B	- 0.2	Neg.
24	Trim	White	Wood	Intact	A/D Corner	- 0.3	Neg.
25	Wall	White	Wood	Deter.	Wall A	7.5	POS.
26	Wall	White	Wood	Deter.	Wall B	5.7	POS.

Page 1 of 24 Inspector's Initials: JR



**LEAD BASED PAINT TESTING DATA SHEET** 

ADDRESS: 397 Jerusalem Road, Starksboro, Vermont Jerusalem Schoolhouse

XRF SERIAL NO.: 2471 ROOM EQUIVALENT: 01 (continued) INSPECTOR: Jennifer Richardson

READING	COMPONENT	COLOR	SUBSTRATE	COND.	TEST LOCATION/DESCRIPTION	XRF READING (mg/sq. cm)	CLASS
27	Wall	White	Wood	Deter.	Wall C	5.9	POS.
28	Wall	White	Wood	Deter.	Wall D	4.5	POS.
29	Trim	White	Wood	Deter.	Wall C, Floor	1.9	POS.
30	Trim	Stained	Wood	Deter.	Wall A, Floor	0.1	Neg.
31	Floor	Stained	Wood	Deter.		0.0	Neg.

Window A-1 components not tested are inaccessible; assume positive.

POS.

DATE: May 3, 2019

Page 2 of 24 Inspector's Initials: JR



Clay Point Associates, Inc. P.O. Box 1254, Williston, VT 05495 (802) 879-2600

ADDRESS: 397 Jerusalem Road, Starksboro, Vermont Jerusalem Schoolhouse DATE: May 3, 2019

XRF SERIAL NO.: 2471 ROOM EQUIVALENT: 01A (Entry) INSPECTOR: Jennifer Richardson

READING	COMPONENT	COLOR	SUBSTRATE	COND.	TEST LOCATION/DESCRIPTION	XRF READING (mg/sq. cm)	CLASS
- Coi	mponents are unp	nainted and u	nstained				
	mponents are amp	anrea ana a	notalirear				

Page 3 of 24 Inspector's Initials: JR



#### **Clay Point Associates, Inc.** P.O. Box 1254, Williston, VT 05495 **LEAD BASED PAINT TESTING DATA SHEET** (802) 879-2600

ADDRESS: 397 Jerusalem Road, Starksboro, Vermont Jerusalem Schoolhouse DATE: May 3, 2019

XRF SERIAL NO.: 2471 ROOM EQUIVALENT: 02 (Classroom) INSPECTOR: Jennifer Richardson

READING	COMPONENT	COLOR	SUBSTRATE	COND.	TEST LOCATION/DESCRIPTION	XRF READING (mg/sq. cm)	CLASS
32	Ceiling	White	Wood	Deter.		5.3	POS.
33	Baseboard	White	Wood	Deter.	Wall D, wide	0.0	Neg.
34	Baseboard	White	Wood	Intact	Wall C, narrow	- 0.0	Neg.
35	Crown Molding	White	Wood	Intact	Wall A	2.9	POS.
36	Door	White	Wood	Deter.	Wall A, Door 1	1.6	POS.
37	Door Casing	White	Wood	Deter.	Wall A, Door 1, inner	5.2	POS.
38	Door Stop	White	Wood	Deter.	Wall A, Door 1	4.7	POS.
39	Door Casing	White	Wood	Intact	Wall A, Door 1, outer	2.0	POS.
40	Door	Stained	Wood	Intact	Wall B, Door 1	- 0.1	Neg.
41	Door	White	Wood	Deter.	Wall C, Door 1	- 0.4	Neg.
42	Door Casing	White	Wood	Deter.	Wall C, Door 1	- 0.3	Neg.
43	Door Jamb	White	Wood	Deter.	Wall C, Door 1	- 0.2	Neg.
44	Casing	White	Wood	Deter.	Wall C, opening	0.7	Neg.
45	Jamb	Green	Wood	Deter.	Wall C, opening	0.1	Neg.
46	Casing	White	Wood	Intact	Wall D, opening	2.5	POS.
47	Jamb	White	Wood	Intact	Wall D, opening	2.2	POS.
48	Door	White	Wood	Deter.	Wall D, Door 1	1.4	POS.
49	Door Casing	White	Wood	Deter.	Wall D, Door 1	2.3	POS.
50	Door Jamb	White	Wood	Deter.	Wall D, Door 1	2.7	POS.
51	Window Sill	White	Wood	Deter.	Wall B, Window 1	1.0	POS.

Page 4 of 24 Inspector's Initials: JR



ADDRESS: 397 Jerusalem Road, Starksboro, Vermont

**LEAD BASED PAINT TESTING DATA SHEET** 

Jerusalem Schoolhouse

XRF SERIAL NO.: 2471 ROOM EQUIVALENT: 02 (Classroom)

INSPECTOR: Jennifer Richardson

DATE: May 3, 2019

READING	COMPONENT	COLOR	SUBSTRATE	COND.	TEST LOCATION/DESCRIPTION	XRF READING (mg/sq. cm)	CLASS
52	Window Apron	White	Wood	Deter.	Wall B, Window 1	1.9	POS.
53	Window Casing	White	Wood	Deter.	Wall B, Window 1	0.5	Neg.
54	Window Stop	White	Wood	Deter.	Wall B, Window 1	0.2	Neg.
55	Infill	White	Concrete	Intact	Wall A, upper	0.0	Neg.
56	Infill Casing	White	Wood	Intact	Wall A, upper	3.1	POS.
57	Casing	White	Wood	Intact	Wall A, assoc. w/ heating duct	0.2	Neg.
58	Trim	White	Wood	Intact	A/B Corner	4.0	POS.
59	Vertical Trim	White	Wood	Intact	Assoc. w/ Wall C, opening	3.8	POS.
60	Trim	White	Wood	Deter.	Wall A, assoc. w/ chalkboard, upper	1.0	POS.
61	Trim	White	Wood	Deter.	Wall A, assoc. w/ chalkboard, lower	1.0	POS.
62	Casing	White	Wood	Deter.	Wall A, assoc. w/ access panel, lower	2.2	POS.
63	Vertical Board	White	Wood	Intact	Wall B, Window 1	0.2	Neg.
64	Casing	White	Wood	Intact	Wall C, assoc. w/ chalkboard	1.0	POS.
65	Casing	White	Wood	Intact	Wall C, assoc. w/ heating duct	0.3	Neg.
66	Pegboard	White	Wood	Deter.	Wall D	0.3	Neg.
67	Casing	White	Wood	Deter.	Wall D, assoc. w/ Pegboard	1.0	POS.
68	Casing	White	Wood	Intact	Wall D, assoc. w/ heating duct	- 0.1	Neg.
69	Trim	White	Wood	Intact	Wall A, assoc. w/ chalkboard	1.0	POS.
70	Duct	White	Metal	Intact	Ceiling, assoc. w/ heating	- 0.5	Neg.
71	Wall	White	Wood	Deter.	Wall A	4.2	POS.

Page 5 of 24 Inspector's Initials: JR



Clay Point Associates, Inc. P.O. Box 1254, Williston, VT 05495 (802) 879-2600

POS.

ADDRESS: 397 Jerusalem Road, Starksboro, Vermont Jerusalem Schoolhouse DATE: May 3, 2019

XRF SERIAL NO.: 2471 ROOM EQUIVALENT: 02 (continued) INSPECTOR: Jennifer Richardson

READING	COMPONENT	COLOR	SUBSTRATE	COND.	TEST LOCATION/DESCRIPTION	XRF READING (mg/sq. cm)	CLASS
72	Wall	White	Wood	Deter.	Wall B	4.6	POS.
73	Wall	White	Wood	Deter.	Wall C	1.8	POS.
74	Wall	White	Wood	Deter.	Wall D	1.7	POS.
75	Trim	White	Wood	Deter.	Floor	0.3	Neg.
76	Floor	Stained	Wood	Deter.		- 0.6	Neg.

Door B-1 components not tested are unpainted and unstained.

Windows B-2, B-3, B-4 and B-5 components are the same as Window B-1.

Page 6 of 24 Inspector's Initials: JR



### Clay Point Associates, Inc. P.O. Box 1254, Williston, VT 05495 (802) 879-2600

ADDRESS: 397 Jerusalem Road, Starksboro, Vermont Jerusalem Schoolhouse DATE: May 3, 2019

XRF SERIAL NO.: 2471 ROOM EQUIVALENT: 02A (Classroom Ext.) INSPECTOR: Jennifer Richardson

READING	COMPONENT	COLOR	SUBSTRATE	COND.	TEST LOCATION/DESCRIPTION	XRF READING (mg/sq. cm)	CLASS
77	Ceiling	White	Wood	Deter.		5.6	POS.
78	Crown Molding	White	Wood	Deter.	Wall A	2.4	POS.
79	Trim	White	Wood	Deter.	Wall A, Floor	0.5	Neg.
80	Casing	White	Wood	Deter.	Wall A, opening	4.1	POS.
81	Jamb	White	Wood	Deter.	Wall A, opening	2.9	POS.
82	Casing	White	Wood	Deter.	Wall B, opening	3.3	POS.
83	Jamb	White	Wood	Deter.	Wall B, opening	1.8	POS.
84	Door	White	Wood	Deter.	Wall C, Door 1	1.0	POS.
85	Door Casing	White	Wood	Deter.	Wall C, Door 1	0.7	Neg.
86	Door Jamb	White	Wood	Deter.	Wall C, Door 1	0.4	Neg.
87	Window Casing	White	Wood	Deter.	Wall D, Window 1	4.0	POS.
88	Window Apron	White	Wood	Deter.	Wall D, Window 1	5.7	POS.
89	Window Sill	White	Wood	Deter.	Wall D, Window 1	3.7	POS.
90	Window Casing	White	Wood	Deter.	Wall D, Window 1	3.9	POS.
91	Wood Block	White	Wood	Intact	Wall A, assoc. w/ curtain	0.1	Neg.
92	Vent	White	Metal	Intact	Wall B	- 0.1	Neg.
93	Cabinet	White	Wood	Deter.	Wall C	0.0	Neg.
94	Shelf	White	Wood	Deter.	Wall C	- 0.0	Neg.
95	Trim	White	Wood	Deter.	Wall D, assoc. w/ chalkboard	1.5	POS.
96	Wall	White	Wood	Deter.	Wall A	2.1	POS.

Page 7 of 24 Inspector's Initials: JR



Clay Point Associates, Inc. P.O. Box 1254, Williston, VT 05495 (802) 879-2600

ADDRESS: 397 Jerusalem Road, Starksboro, Vermont Jerusalem Schoolhouse DATE: May 3, 2019

XRF SERIAL NO.: 2471 ROOM EQUIVALENT: 02A (continued) INSPECTOR: Jennifer Richardson

READING	COMPONENT	COLOR	SUBSTRATE	COND.	TEST LOCATION/DESCRIPTION	XRF READING (mg/sq. cm)	CLASS
97	Wall	White	Wood	Deter.	Wall B	1.4	POS.
98	Wall	White	Wood	Deter.	Wall C	3.9	POS.
99	Wall	White	Wood	Deter.	Wall D	3.9	POS.
100	Floor	Stained	Wood	Deter.		0.1	Neg.

Window D-2 components are the same as Window D-1.

POS.

- Window infill's are unpainted and unstained.

Page 8 of 24 Inspector's Initials: JR



ADDRESS: 397 Jerusalem Road, Starksboro, Vermont

**LEAD BASED PAINT TESTING DATA SHEET** 

Jerusalem Schoolhouse

XRF SERIAL NO.: 2471 ROOM EQUIVALENT: 03 (Kitchen) INSPECTOR: Jennifer Richardson

DATE: May 3, 2019

READING	COMPONENT	COLOR	SUBSTRATE	COND.	TEST LOCATION/DESCRIPTION	XRF READING (mg/sq. cm)	CLASS
101	Ceiling	White	Wood	Deter.		5.4	POS.
102	Crown Molding	White	Wood	Intact	Wall D	1.8	POS.
103	Door	White	Wood	Deter.	Wall B, Door 1	3.3	POS.
104	Door Casing	White	Wood	Deter.	Wall B, Door 1	4.9	POS.
105	Door Stop	White	Wood	Deter.	Wall B, Door 1	4.5	POS.
106	Threshold	Stained	Wood	Deter.	Wall B, Door 1	0.0	Neg.
107	Casing	White	Wood	Deter.	Wall C, opening	5.4	POS.
108	Jamb	White	Wood	Deter.	Wall C, opening	1.5	POS.
109	Window Sill	White	Wood	Deter.	Wall A, Window 1	5.4	POS.
110	Window Apron	White	Wood	Deter.	Wall A, Window 1	4.5	POS.
111	Window Casing	White	Wood	Deter.	Wall A, Window 1	5.6	POS.
112	Window Stop	White	Wood	Deter.	Wall A, Window 1	4.6	POS.
113	Window Sash	Yellow	Wood	Deter.	Wall A, Window 1	> 9.9	POS.
114	Window Jamb	Yellow	Wood	Deter.	Wall A, Window 1	2.3	POS.
115	Infill	White	Wood	Deter.	Wall A	- 0.2	Neg.
116	Infill Casing	White	Wood	Deter.	Wall A	4.0	POS.
117	Cabinet	White	Wood	Intact	Wall B	1.0	POS.
118	Shelf	White	Wood	Intact	Wall B	- 0.3	Neg.
119	Infill	White	Wood	Intact	Wall D	0.1	Neg.
120	Vertical Pipe	White	Metal	Intact	Wall D, behind counter	- 0.1	Neg.

Page 9 of 24 Inspector's Initials: JR



ADDRESS: 397 Jerusalem Road, Starksboro, Vermont Jerusale

**LEAD BASED PAINT TESTING DATA SHEET** 

Jerusalem Schoolhouse DATE: May 3, 2019

XRF SERIAL NO.: 2471 ROOM EQUIVALENT: 03 (continued) INSPECTOR: Jennifer Richardson

READING	COMPONENT	COLOR	SUBSTRATE	COND.	TEST LOCATION/DESCRIPTION	XRF READING (mg/sq. cm)	CLASS
121	H. Board	White	Wood	Intact	Wall D, assoc. w/ sink	0.1	Neg.
122	Shelf	White	Wood	Intact	Wall D	1.3	POS.
123	Corner Board	White	Wood	Deter.	A/D corner	4.4	POS.
124	Corner Board	Green	Wood	Deter.	A/D corner	6.1	POS.
125	Wall	White	Wood	Deter.	Wall A	6.3	POS.
126	Wall	White	Wood	Deter.	Wall B	2.1	POS.
127	Wall	White	Wood	Deter.	Wall C	2.9	POS.
128	Wall	White	Wood	Deter.	Wall D	4.3	POS.
129	Wall	Lt. Green	Wood	Deter.	Wall A, upper	5.4	POS.
130	Wall	Lt. Green	Wood	Deter.	Wall C, upper	5.2	POS.
131	Wall	Dk. Green	Wood	Deter.	Wall A, lower	1.4	POS.
132	Wall	Dk. Green	Wood	Deter.	Wall C, lower	2.9	POS.
133	Floor	Stained	Wood	Deter.		- 0.1	Neg.

- Window A-2 is inaccessible; sash and jamb are yellow, remaining components are the same.

POS.

Page 10 of 24 Inspector's Initials: JR



Clay Point Associates, Inc. P.O. Box 1254, Williston, VT 05495 (802) 879-2600

ADDRESS: 397 Jerusalem Road, Starksboro, Vermont Jerusalem Schoolhouse DATE: May 3, 2019

XRF SERIAL NO.: 2471 ROOM EQUIVALENT: 04 (Bathroom) INSPECTOR: Jennifer Richardson

READING	COMPONENT	COLOR	SUBSTRATE	COND.	TEST LOCATION/DESCRIPTION	XRF READING (mg/sq. cm)	CLASS
134	Ceiling	White	Wood	Intact		0.3	Neg.
135	Baseboard	Grey	Concrete	Deter.	Wall B	0.1	Neg.
136	Door	White	Wood	Intact	Wall A, Door 1	0.1	Neg.
137	Door Casing	White	Wood	Intact	Wall A, Door 1	0.1	Neg.
138	Door Stop	White	Wood	Intact	Wall A, Door 1	- 0.1	Neg.
139	Threshold	Grey	Concrete	Deter.	Wall A, Door 1	0.1	Neg.
140	Window Sill	White	Wood	Intact	Wall B, Window 1	0.2	Neg.
141	Window Apron	White	Wood	Intact	Wall B, Window 1	0.2	Neg.
142	Window Casing	White	Wood	Intact	Wall B, Window 1	0.1	Neg.
143	Window Stop	White	Wood	Intact	Wall B, Window 1	0.1	Neg.
144	Wall	White	Wood	Intact	Wall A	0.1	Neg.
145	Wall	White	Concrete	Intact	Wall B, lower	0.1	Neg.
146	Wall	White	Wood	Intact	Wall B, upper	0.1	Neg.
147	Wall	White	Wood	Intact	Wall C	0.2	Neg.
148	Wall	White	Wood	Intact	Wall C	0.1	Neg.
149	Floor	Grey	Concrete	Deter.		- 0.1	Neg.

- Window sash and well are inaccessible; assume positive.

POS.

Page 11 of 24 Inspector's Initials: JR



Clay Point Associates, Inc. P.O. Box 1254, Williston, VT 05495 (802) 879-2600

ADDRESS: 397 Jerusalem Road, Starksboro, Vermont Jerusalem Schoolhouse DATE: May 3, 2019

XRF SERIAL NO.: 2471 ROOM EQUIVALENT: 05 (Hall) INSPECTOR: Jennifer Richardson

READING	COMPONENT	COLOR	SUBSTRATE	COND.	TEST LOCATION/DESCRIPTION	XRF READING (mg/sq. cm)	CLASS
150	Casing	Green	Wood	Intact	Wall A, opening	- 0.1	Neg.
151	Jamb	Green	Pressed Board	Intact	Wall A, opening	- 0.1	Neg.
152	Door	Green	Wood	Deter	Wall B, Door 1	0.5	Neg.
153	Door Casing	Green	Wood	Deter	Wall B, Door 1	0.1	Neg.
154	Door Jamb	White	Wood	Deter	Wall B, Door 1	0.1	Neg.
155	Casing	Green	Wood	Deter	Wall C, opening	- 0.2	Neg.
156	Jamb	White	Wood	Deter	Wall C, opening	0.1	Neg.
157	Vertical Board	Green	Wood	Deter	½ wall	- 0.2	Neg.
158	Vertical Trim	Green	Wood	Deter	½ wall	- 0.1	Neg.
159	Casing	Green	Wood	Intact	Wall B, assoc. w/ heating duct	0.1	Neg.
160	Wall	Green	Wood	Deter	Wall A	0.0	Neg.
161	Wall	Green	Pressed Board	Deter	Wall B	0.1	Neg.
162	Wall	Green	Pressed Board	Deter	Wall C	0.0	Neg.
163	Wall	Green	Pressed Board	Deter	Wall D	- 0.2	Neg.
164	Floor	Grey	Concrete	Deter		- 0.3	Neg.

- Ceiling is unpainted and unstained.

Page 12 of 24 Inspector's Initials: JR



ADDRESS: 397 Jerusalem Road, Starksboro, Vermont

**LEAD BASED PAINT TESTING DATA SHEET** 

Jerusalem Schoolhouse

XRF SERIAL NO.: 2471 ROOM EQUIVALENT: 06 (Bathroom)

INSPECTOR: Jennifer Richardson

DATE: May 3, 2019

READING	COMPONENT	COLOR	SUBSTRATE	COND.	TEST LOCATION/DESCRIPTION	XRF READING (mg/sq. cm)	CLASS
165	Ceiling	White	Wood	Intact		- 0.3	Neg.
166	Baseboard	Grey	Wood	Intact	Wall D	- 0.1	Neg.
167	Door	White	Wood	Intact	Wall D, Door 1	0.6	Neg.
168	Door Casing	White	Wood	Intact	Wall D, Door 1	0.1	Neg.
169	Door Stop	White	Wood	Intact	Wall D, Door 1	- 0.2	Neg.
170	Threshold	White	Wood	Intact	Wall D, Door 1	- 0.2	Neg.
171	Window Sill	White	Wood	Intact	Wall B, Window 1	- 0.1	Neg.
172	Window Apron	White	Wood	Intact	Wall B, Window 1	0.0	Neg.
173	Window Casing	White	Wood	Intact	Wall B, Window 1	0.1	Neg.
174	Window Stop	White	Wood	Intact	Wall B, Window 1	0.1	Neg.
175	Wall	White	Wood	Intact	Wall A	0.0	Neg.
176	Wall	White	Wood	Intact	Wall B	- 0.1	Neg.
177	Wall	White	Concrete	Intact	Wall B	- 0.1	Neg.
178	Wall	White	Wood	Intact	Wall C	0.1	Neg.
179	Wall	White	Wood	Intact	Wall D	- 0.0	Neg.
180	Floor	Grey	Concrete	Intact		- 0.1	Neg.

- Window sash and well are inaccessible; assume positive.

POS.

Page 13 of 24 Inspector's Initials: JR



Clay Point Associates, Inc. P.O. Box 1254, Williston, VT 05495 (802) 879-2600

ADDRESS: 397 Jerusalem Road, Starksboro, Vermont Jerusalem Schoolhouse DATE: May 3, 2019

XRF SERIAL NO.: 2471 ROOM EQUIVALENT: 07 (Utility Room) INSPECTOR: Jennifer Richardson

READING	COMPONENT	COLOR	SUBSTRATE	COND.	TEST LOCATION/DESCRIPTION	XRF READING (mg/sq. cm)	CLASS
- Coi	mponents are unp	nainted and u	nstained				
	mponents are amp	anrea ana a	notalirear				

Page 14 of 24 Inspector's Initials: JR



ADDRESS: 397 Jerusalem Road, Starksboro, Vermont Jerusalem Schoolhouse DATE: May 3, 2019

**LEAD BASED PAINT TESTING DATA SHEET** 

XRF SERIAL NO.: 2471 ROOM EQUIVALENT: 08 (Hall) INSPECTOR: Jennifer Richardson

READING	COMPONENT	COLOR	SUBSTRATE	COND.	TEST LOCATION/DESCRIPTION	XRF READING (mg/sq. cm)	CLASS
- Coi	mponents are unp	painted and u	nstained.				
	mponiones are amp	amed and a					

Page 15 of 24 Inspector's Initials: JR



Clay Point Associates, Inc. P.O. Box 1254, Williston, VT 05495 (802) 879-2600

ADDRESS: 397 Jerusalem Road, Starksboro, Vermont Jerusalem Schoolhouse DATE: May 3, 2019

XRF SERIAL NO.: 2471 ROOM EQUIVALENT: 09 (Storage) INSPECTOR: Jennifer Richardson

READING	COMPONENT	COLOR	SUBSTRATE	COND.	TEST LOCATION/DESCRIPTION	XRF READING (mg/sq. cm)	CLASS
– Col	mponents are unp	nainted and u	nstained				
	inponents are amp	antea ana a	notalited!				

Page 16 of 24 Inspector's Initials: JR



ADDRESS: 397 Jerusalem Road, Starksboro, Vermont

**LEAD BASED PAINT TESTING DATA SHEET** 

Jerusalem Schoolhouse DATE: May 3, 2019

XRF SERIAL NO.: 2471 ROOM EQUIVALENT: 10 (Misc. Room) INSPECTOR: Jennifer Richardson

READING	COMPONENT	COLOR	SUBSTRATE	COND.	TEST LOCATION/DESCRIPTION	XRF READING (mg/sq. cm)	CLASS
181	Ceiling	White	Wood	Deter.		- 0.1	Neg.
182	Crown Molding	White	Wood	Deter.	Wall A	- 0.0	Neg.
183	Door	Green	Wood	Deter.	Wall A, Door 1	- 0.2	Neg.
184	Door Casing	Green	Wood	Deter.	Wall A, Door 1	- 0.2	Neg.
185	Door Stop	Green	Wood	Deter.	Wall A, Door 1	- 0.1	Neg.
186	Threshold	Grey	Wood	Deter.	Wall A, Door 1	- 0.5	Neg.
187	Window Sill	Green	Wood	Deter.	Wall C, Window 1	- 0.3	Neg.
188	Window Casing	White	Wood	Deter.	Wall C, Window 1	- 0.0	Neg.
189	Window Casing	Green	Wood	Deter.	Wall C, Window 1	- 0.2	Neg.
190	Window Casing	Green	Wood	Deter.	Wall C, Window 1	- 0.6	Neg.
191	Window Casing	Grey	Wood	Deter.	Wall C, Window 1	- 0.1	Neg.
192	Window Sash	White	Wood	Deter.	Wall C, Window 1	- 0.3	Neg.
193	Window Sash	Green	Wood	Deter.	Wall C, Window 1	- 0.2	Neg.
194	Vertical Trim	White	Wood	Deter.	A/D Corner	- 0.1	Neg.
195	Wall	White	Wood	Deter.	Wall A, upper	- 0.1	Neg.
196	Wall	White	Wood	Deter.	Wall B, upper	- 0.3	Neg.
197	Wall	White	Wood	Deter.	Wall C, upper	- 0.1	Neg.
198	Wall	White	Wood	Deter.	Wall D, upper	- 0.2	Neg.
199	Wall	Green	Wood	Deter.	Wall A, middle	- 0.3	Neg.
200	Wall	Green	Wood	Deter.	Wall B, middle	- 0.2	Neg.

Page 17 of 24 Inspector's Initials: JR



Clay Point Associates, Inc. P.O. Box 1254, Williston, VT 05495 (802) 879-2600

ADDRESS: 397 Jerusalem Road, Starksboro, Vermont Jerusalem Schoolhouse DATE: May 3, 2019

XRF SERIAL NO.: 2471 ROOM EQUIVALENT: 10 (continued) INSPECTOR: Jennifer Richardson

READING	COMPONENT	COLOR	SUBSTRATE	COND.	TEST LOCATION/DESCRIPTION	XRF READING (mg/sq. cm)	CLASS
201	Wall	Green	Wood	Deter.	Wall C, middle	- 0.5	Neg.
202	Wall	Green	Wood	Deter.	Wall D, middle	- 0.3	Neg.
203	Wall	Grey	Wood	Deter.	Wall A, lower	- 0.1	Neg.
204	Wall	Grey	Wood	Deter.	Wall B, lower	0.0	Neg.
205	Wall	Grey	Wood	Deter.	Wall C, lower	0.2	Neg.
206	Floor	Grey	Wood	Deter.		0.0	Neg.

Window C-2 components are the same as Window C-1, sash and well are inaccessible; assume positive.

Page 18 of 24 Inspector's Initials: JR



**LEAD BASED PAINT TESTING DATA SHEET** 

ADDRESS: 397 Jerusalem Road, Starksboro, Vermont Jerusalem Schoolhouse DATE: May 3, 2019

XRF SERIAL NO.: 2471 ROOM EQUIVALENT: 11 (Hall) INSPECTOR: Jennifer Richardson

READING	COMPONENT	COLOR	SUBSTRATE	COND.	TEST LOCATION/DESCRIPTION	XRF READING (mg/sq. cm)	CLASS
207	Window Stop	White	Wood	Deter.	Wall B, Window 1	1.8	POS.
208	Window Sill	Grey	Wood	Deter.	Wall B, Window 1	0.4	Neg.
209	Infill	White	Wood	Deter.	Wall B, Window 1, lower	1.2	POS.
210	Horiz. Board	Grey	Wood	Deter.	Wall A	0.3	Neg.
211	Floor	Grey	Wood	Deter.		0.1	Neg.

Page 19 of 24 Inspector's Initials: JR



Clay Point Associates, Inc. P.O. Box 1254, Williston, VT 05495 (802) 879-2600

ADDRESS: 397 Jerusalem Road, Starksboro, Vermont Jerusalem Schoolhouse DATE: May 3, 2019

XRF SERIAL NO.: 2471 ROOM EQUIVALENT: 12 (Garage) INSPECTOR: Jennifer Richardson

READING	COMPONENT	COLOR	SUBSTRATE	COND.	TEST LOCATION/DESCRIPTION	XRF READING (mg/sq. cm)	CLASS
212	Ceiling	White	Sheet Rock	Deter.		- 0.4	Neg.
213	Ceiling Trim	White	Wood	Deter.		- 0.1	Neg.
214	Chair Rail	White	Wood	Deter.	Wall B	- 0.1	Neg.
215	Door	White	Metal	Deter.	Wall A, Door 1	0.1	Neg.
216	Door	Grey	Metal	Deter.	Wall D, Door 1	- 0.2	Neg.
217	Door Jamb	White	Wood	Deter.	Wall D, Door 1	- 0.3	Neg.
218	Window Sill	White	Wood	Deter.	Wall C, Window 1	0.0	Neg.
219	Window Casing	White	Wood	Deter.	Wall C, Window 1	0.1	Neg.
220	Window Stop	White	Wood	Deter.	Wall C, Window 1	0.1	Neg.

Walls and Floor are unpainted and unstained.

Foundation is unpainted CMU.

Page 20 of 24 Inspector's Initials: JR



Clay Point Associates, Inc. P.O. Box 1254, Williston, VT 05495 (802) 879-2600

ADDRESS: 397 Jerusalem Road, Starksboro, Vermont Jerusalem Schoolhouse DATE: May 3, 2019

XRF SERIAL NO.: 2471 ROOM EQUIVALENT: Exterior INSPECTOR: Jennifer Richardson

READING	COMPONENT	COLOR	SUBSTRATE	COND.	TEST LOCATION/DESCRIPTION	XRF READING (mg/sq. cm)	CLASS
07	Soffit	White	Wood	Deter.	Wall A, garage	- 0.2	Neg.
08	Fascia	White	Wood	Deter.	Wall A, garage	0.0	Neg.
09	Soffit	White	Wood	Deter.	Wall A, Door 1. overhang	1.0	POS.
10	Ceiling	White	Wood	Deter.	Wall A, Door 1. overhang	8.3	POS.
11	Face	White	Wood	Deter.	Wall A, Door 1. overhang	1.0	POS.
12	Trim	White	Wood	Deter.	Wall A, Door 1. overhang	1.0	POS.
13	Diag. Support	White	Wood	Deter.	Wall A, Door 1. overhang	1.7	POS.
14	Door	White	Wood	Deter.	Wall A, Door 1	> 9.9	POS.
15	Door Casing	White	Wood	Deter.	Wall A, Door 1	2.8	POS.
16	Door Jamb	White	Wood	Deter.	Wall A, Door 1	> 9.9	POS.
17	Header	White	Wood	Deter.	Wall A, Door 1	2.3	POS.
18	Door	White	Wood	Deter.	Wall A, Door 3, garage	- 0.2	Neg.
19	Door Casing	White	Wood	Deter.	Wall A, Door 3, garage	- 0.0	Neg.
20	Door Stop	White	Wood	Deter.	Wall A, Door 3, garage	- 0.4	Neg.
21	Window Sill	White	Wood	Deter.	Wall A, Window 1	6.3	POS.
22	Window Casing	White	Wood	Deter.	Wall A, Window 1	6.0	POS.
23	Window Stop	White	Wood	Deter.	Wall A, Window 1	2.6	POS.
24	Window Sash	White	Wood	Deter.	Wall A, Window 1	> 9.9	POS.
25	Corner Board	White	Wood	Deter.	A/B corner	4.7	POS.
26	Wall	White	Wood	Deter.	Wall A	5.8	POS.

Page 21 of 24 Inspector's Initials: JR



### Clay Point Associates, Inc. P.O. Box 1254, Williston, VT 05495 (802) 879-2600

ADDRESS: 397 Jerusalem Road, Starksboro, Vermont Jerusalem Schoolhouse DATE: May 3, 2019

XRF SERIAL NO.: 2471 ROOM EQUIVALENT: Exterior (continued) INSPECTOR: Jennifer Richardson

READING	COMPONENT	COLOR	SUBSTRATE	COND.	TEST LOCATION/DESCRIPTION	XRF READING (mg/sq. cm)	CLASS
27	Door	White	Wood	Deter.	Wall B, Door 1	0.1	Neg.
28	Door Casing	White	Wood	Deter.	Wall B, Door 1	0.1	Neg.
29	Door Jamb	White	Wood	Deter.	Wall B, Door 1	0.1	Neg.
30	Kick Plate	White	Wood	Deter.	Wall B, Door 1	0.3	Neg.
31	Window Casing	White	Wood	Deter.	Wall B, Window 1	- 0.3	Neg.
32	Window Sash	White	Wood	Deter.	Wall B, Window 1	- 0.3	Neg.
33	Window Sill	White	Wood	Deter.	Wall B, Window 3	- 0.1	Neg.
34	Window Casing	White	Wood	Deter.	Wall B, Window 3	0.1	Neg.
35	Window Stop	White	Wood	Deter.	Wall B, Window 3	0.4	Neg.
36	Window Sash	White	Wood	Deter.	Wall B, Window 3	3.3	POS.
37	Infill	White	Wood	Deter.	Wall B (window assoc. w/ addition)	- 0.6	Neg.
38	Infill Door	White	Wood	Deter.	Wall B	0.1	Neg.
39	Infill Casing	White	Wood	Deter.	Wall B	0.1	Neg.
40	Corner Board	White	Wood	Deter.	B/C corner, assoc. w/ original building	9.0	POS.
41	Corner Board	White	Wood	Deter.	B/C corner, assoc. w. addition	2.7	POS.
42	Wall	White	Wood	Deter.	Wall B, assoc. w/ Wall B entry	- 0.3	Neg.
43	Soffit	White	Wood	Deter.	Wall C, garage	- 0.1	Neg.
44	Fascia	White	Wood	Deter.	Wall C, garage	- 0.1	Neg.
45	Soffit	White	Wood	Deter.	Wall C. addition	2.8	POS.
46	Fascia	White	Wood	Deter.	Wall C. addition	2.4	POS.

Page 22 of 24 Inspector's Initials: JR



Clay Point Associates, Inc. P.O. Box 1254, Williston, VT 05495 (802) 879-2600

ADDRESS: 397 Jerusalem Road, Starksboro, Vermont Jerusalem Schoolhouse DATE: May 3, 2019

XRF SERIAL NO.: 2471 ROOM EQUIVALENT: Exterior (continued) INSPECTOR: Jennifer Richardson

READING	COMPONENT	COLOR	SUBSTRATE	COND.	TEST LOCATION/DESCRIPTION	XRF READING (mg/sq. cm)	CLASS
47	Window Casing	White	Wood	Deter.	Wall C, Window 1	- 0.3	Neg.
48	Window Sash	White	Wood	Deter.	Wall C, Window 1	- 0.0	Neg.
49	Window Casing	White	Wood	Deter.	Wall C, Window 2	2.4	POS.
50	Window Sash	White	Wood	Deter.	Wall C, Window 2	0.4	Neg.
51	Corner Board	White	Wood	Deter.	C/D corner, addition	3.5	POS.
52	Corner Board	White	Wood	Deter.	C/D corner, original building	2.8	POS.
53	Wall	White	Wood	Deter.	Wall C, garage	- 0.1	Neg.
54	Wall	White	Wood	Deter.	Wall C, original building	4.1	POS.
55	Wall	White	Wood	Deter.	Wall C, original building, lower	- 0.3	Neg.
56	Wall	White	Wood	Deter.	Wall C, addition	0.4	Neg.
57	Soffit	White	Wood	Deter.	Wall D, garage	- 0.1	Neg.
58	Fascia	White	Wood	Deter.	Wall D, garage	- 0.2	Neg.
59	Soffit	White	Wood	Deter.	Wall D, addition	2.4	POS.
60	Fascia	White	Wood	Deter.	Wall D, addition	2.9	POS.
61	Door	Red	Metal	Deter.	Wall D, Door 1	- 0.1	Neg.
62	Door Casing	White	Wood	Deter.	Wall D, Door 1	0.1	Neg.
63	Door Stop	White	Wood	Deter.	Wall D, Door 1	0.2	Neg.
64	Window Casing	White	Wood	Deter.	Wall D, Window 1	- 0.4	Neg.
65	Window Sash	White	Wood	Deter.	Wall D, Window 1	- 0.1	Neg.
66	Corner Board	White	Wood	Deter.	D/A Corner, garage	0.3	Neg.

Page 23 of 24 Inspector's Initials: JR



## **LEAD BASED PAINT TESTING DATA SHEET**

ADDRESS: 397 Jerusalem Road, Starksboro, Vermont Jerusalem Schoolhouse DATE: May 3, 2019

XRF SERIAL NO.: 2471 ROOM EQUIVALENT: INSPECTOR: Jennifer Richardson

READING	COMPONENT	COLOR	SUBSTRATE	COND.	TEST LOCATION/DESCRIPTION	XRF READING (mg/sq. cm)	CLASS
67	Corner Board	White	Wood	Deter.	C/D Corner, garage	- 0.2	Neg.
68	Wall	White	Wood	Deter.	Wall D, garage	- 0.1	Neg.
69	Wall	White	Wood	Deter.	Wall D, addition	2.4	POS.

Soffits and Fascia on original building are inaccessible; assume positive.

POS.

Door A-2 components are the same as Door A-1.

Window A-2 (2<sup>nd</sup> Floor) is inaccessible, assume positive. **POS.** 

Windows A-2 and A-3 (1<sup>st</sup> Floor) components are the same as Window A-1 (1<sup>st</sup> Floor). **POS.** 

– Window B-2 components are the same as Window B-1.

Windows B-4, B-5, B-6 and B-7 components are the same as Window B-3.

Window C-3 components are the same as Window C-2.

Foundation is unpainted concrete and CMU.

Page 24 of 24 Inspector's Initials: JR

#### LEAD CONSULTING ENTITY

CLAY POINT ASSOCIATES INC. P.O. BOX 1254 WILLISTON, VT 05495-1254 Vermont Department of Health Environmental Health P.O. Box 70 - Drawer 30 Burlington, VT 05402-0070

LICENSE: LC200999

EXPIRES: Monday, March 23, 2020

CERTIFICATE OF LICENSE
VERMONT LEAD REGULATORY PROGRAM

THIS CERTIFICATE SHALL REMAIN IN FORCE UNTIL THE EXPIRATION DATE UNLESS REVOKED OR VOIDED BEFORE THAT TIME.
THIS CERTIFICATE IS NOT TRANSFERABLE AND IS VALID ONLY FOR THE ABOVE PARTY.

COPY OF THIS CERTIFICATE MUST BE ON SITE AT ALL TIMES.

Cul

#### LEAD CONSULTING ENTITY

CLAY POINT ASSOCIATES INC. P.O. BOX 1254 WILLISTON, VT 05495-1254 Vermont Department of Health Environmental Health P.O. Box 70 - Drawer 30 Burlington, VT 05402-0070

LICENSE: LC200999

EXPIRES: Monday, March 23, 2020

CERTIFICATE OF LICENSE
VERMONT LEAD REGULATORY PROGRAM

THIS CERTIFICATE SHALL REMAIN IN FORCE UNTIL THE EXPIRATION DATE UNLESS REVOKED OR VOIDED BEFORE THAT TIME.
THIS CERTIFICATE IS NOT TRANSFERABLE AND IS VALID ONLY FOR THE ABOVE PARTY.

COPY OF THIS CERTIFICATE MUST BE ON SITE AT ALL TIMES.

Cul

#### LEAD INSPECTOR TECHNICIAN I

JENNIFER RICHARDSON 180 EAST SHORE ROAD GRAND ISLE, VT 05458 Vermont Department of Health Environmental Health P.O. Box 70 - Drawer 30 Burlington, VT 05402-0070

LICENSE: IT496486

EXPIRES: Thursday, August 29, 2019

CERTIFICATE OF LICENSE
VERMONT LEAD REGULATORY PROGRAM

THIS CERTIFICATE SHALL REMAIN IN FORCE UNTIL THE EXPIRATION DATE UNLESS REVOKED OR VOIDED BEFORE THAT TIME. THIS CERTIFICATE IS NOT TRANSFERABLE AND IS VALID ONLY FOR THE ABOVE PARTY.

COPY OF THIS CERTIFICATE AND PHOTO ID CARD MUST BE ON SITE AT ALL TIMES.