

Herbaugh, Melinda

From: Tan, Shirlee <Shirlee.Tan@kingcounty.gov>
Sent: Friday, May 12, 2017 11:24 AM
To: PRC
Subject: Project #: 3020338 - Attn: Magda Hogness

Date: May 12, 2017
Planner: Magda Hogness
Project #: 3020338

Dear Ms. Hogness,

The building that the applicant will demolition under this proposal was built in 1959. Approximately 69% of buildings built between 1940-1959 contain lead risks, usually in the form of lead paint¹. We assume this property has lead risks unless it has been determined to be free of risks by an EPA certified lead inspector or risk assessor. Buildings constructed between 1929-1979 often contain poly-chlorinated biphenyls (PCBs) in the form of window caulking and paint, and we assume this building contains PCB risks as well. The applicant does not mention lead or PCB hazards under question 7(a5). The following information will assist with correct abatement procedures required under WAC 296-155-775:

“(9) It shall be determined whether asbestos, hazardous materials, hazardous chemicals, gases, explosives, flammable materials, or similarly dangerous substances are present at the work site. When the presence of any such substance is apparent or suspected, testing and removal or purging shall be performed and the hazard eliminated before demolition is started. Removal of such substances shall be in accordance with the requirements of chapters **296-62₂** and **296-65 WAC**.”

In addition to the requirements in WAC 296-155-755 the Washington State Department of Health Recommends that the applicant^{3,4}:

- Provide advanced community notification with actual demolition dates.
- Control dust using water from a water truck or existing water service. If you do not have water service, you must obtain a water connection.
- If no water source or connection is available, you may apply for a hydrant permit to use water temporarily from a hydrant.
- Use fencing and other barriers to control the spread of dust during and after demolition.
- Protect the stormwater drainage system from sediment-laden runoff and loose particles. To the extent possible, use dikes, berms or other methods to protect overland discharge paths from runoff.
- Sweep street gutters, sidewalks, driveways, and other paved surfaces in the immediate area of the demolition daily to collect and property dispose of loose debris and garbage.
- Keep children and other pedestrians away from the site.

Why is it important to reduce the risk of lead exposure?

Lead dust created during demolition activities can affect workers, their families, and community members through direct and indirect exposure to lead dust generated during demolition. Children under six and pregnant women are at the greatest risk. Lead can cross the placental and blood-brain barriers and cause irreversible IQ loss, lead to behavioral problems, and reduce fertility. No safe blood lead level in children has been identified. Lead exposure often occurs with no obvious symptoms and frequently goes unrecognized. In adults lead exposure increases the risk of high blood pressure, heart disease, and kidney disease. Lead dust caused by demolition can spread a radius of 400 feet surrounding the demolition site, but proper actions can reduce the spread into the environment and neighborhoods where children live and play.

1 Jacobs, D. E., Clickner, R. P., Zhou, J. Y., Viet, S. M., Marker, D. A., Rogers, J. W., ... Friedman, W. (2002). The prevalence of lead-based paint hazards in U.S. housing. *Environmental Health Perspectives*, 110(10), A599–A606

2 WAC 296-62-07521 Covers occupational lead exposure

3 Adapted from US EPA recommendations

<http://www2.epa.gov/large-scale-residential-demolition/lead-based-paint-and-demolition>

4 Adapted from Seattle Public Utilities

<http://www.seattle.gov/Util/ForBusinesses/Construction/CDWasteManagement/DustControlWaterUsage/index.htm>

If you have any questions, please contact me.

Sincerely,

Shirlee Tan, PhD

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