



LEAD-BASED PAINT INVESTIGATION REPORT

**I-20 BRIDGE OVER SALUDA RIVER
LEXINGTON COUNTY, SOUTH CAROLINA**

PREPARED FOR:



Mr. David Kinard, P.E.
Project Manager
3955 Faber Place Drive, Suite 300
North Charleston, South Carolina 29405

PREPARED BY:

F&ME Consultants
3112 Devine Street
Columbia, South Carolina 29205

March 1, 2019

Yes, lead was found.
 No, lead was not found.

F&ME Project No.: G5662.010

TABLE OF CONTENTS

1. Executive Summary	1
2. LBP Background Information.....	3
3. Introduction.....	3
4. Investigation Results	4
5. Recommendations	5
Appendices.....	7
Appendix A – Site Vicinity Map	
Appendix B – General Bridge Plan	
Appendix C – XRF Data	
Appendix D – Site Photographs	
Appendix E – Personnel Certifications	



EXECUTIVE SUMMARY

This executive summary is intended as an overview for the convenience of the reader. This report should be reviewed in its entirety prior to making any decisions regarding this project.

F&ME Consultants has completed a Lead-Based Paint (LBP) Investigation on the I-20 Bridge Over Saluda River in Lexington County, South Carolina, for HDR, Inc (David Kinard, P.E. - Project Manager), on February 13, 2019, into February 14, 2019. Appendix A – Site Vicinity Map is provided to show the location of the bridge. Appendix B – General Bridge Plan, is provided to show the layout of the bridge and locations of XRF scans taken on the bridge.

Per an agreed upon scope of work, this LBP Investigation was conducted to identify, analyze, and assess the condition of any LBP or coated bridge components which may be affected by the planned demolition activities. Additionally, F&ME agreed to provide recommendations regarding proper handling and/or disposal methods if any LBP or coatings were identified. This investigation includes both a visual evaluation of the physical condition of painted materials as well as quantitative testing of random surfaces using a Heuresis X-Ray Fluorescence (XRF) Portable Analyzer (Model # Pb200i, Serial #1888) with a limit of detection (LOD) of 0.1 mg/cm². This LBP investigation was performed on February 13, 2019 into February 14, 2019.

LBP is regulated by multiple government agencies, and each requires different response actions when the concentration of lead exceeds specified thresholds. The Occupational Safety and Health Administration (OSHA) regulates worker exposure to lead dust, and as a result considers materials with any lead content to be a potential hazard. Furthermore, the South Carolina Department of Health and Environmental Control (SCDHEC) requires some materials found to contain greater than or equal to (\geq) 0.7 mg/cm² lead to be disposed of at specialized waste facilities. Appendix C – XRF Data, is provided to present the data in a user-friendly format. The XRF results have been highlighted to show which threshold has been exceeded. Items in red text exceed the SCDHEC threshold, while items in blue text contain lead in concentrations between 0.01 to <0.7 mg/cm² and would therefore be subject to OSHA's regulations.

The results from the XRF quantitative testing indicate that lead is present in paint and/or coatings at levels that equal to or exceed the SCDHEC threshold for lead (0.7 mg/cm²) in the following bridge components associated with the bridge:


- Beam Bearing Plates (thick and thin)
- Pipe Support Channels



We appreciate the opportunity to assist you in this matter. If you have any questions or require additional information, please feel free to contact our office at (803) 254-4540.

Sincerely,

F&ME CONSULTANTS



Jeffrey S. Leary

S.C. Lead-Based Paint Inspector

EPA Certification No. SC-I-18721-3 (Exp. 07/29/21)



Glynn M. Ellen

Environmental Department Manager



LBP BACKGROUND INFORMATION

Housing and Urban Development (HUD) defines “LBP” as any coating that has a lead concentration of 1.0 milligrams of lead per square centimeter (1.0 mg/cm²) or greater, or if the lead concentration is greater than one half of a percent (> 0.5%) by weight. The Consumer Product Safety Commission (CPSC) currently considers paint to be lead-containing if the concentration of lead exceeds 90 ppm (0.009% by weight). In 1978, the CPSC banned the sale of LBP to consumers, and banned its application in areas where consumers have direct access to painted surfaces. Both the CPSC and HUD definitions of lead-containing paint are aimed at protecting the general population from exposure to lead in the residential setting.

In contrast, the mission of OSHA with respect to lead-containing paint is to protect workers during construction activities that may generate elevated airborne lead concentrations. OSHA states that construction work (including renovation, maintenance, and demolition) carried-out on structures coated with paint having lead concentrations lower than the HUD or CPSC can still result in airborne lead concentrations in excess of regulatory limits. For this reason, OSHA has not defined lead-containing paint, but states that paint having any measurable level of lead (> 0.01 mg/cm²) may pose a substantial exposure hazard during construction work, depending upon the work performed. Therefore, in these situations, OSHA guidelines and safety procedures should be followed. By OSHA standards and regulations, the employer shall ensure that no employee is exposed to lead at concentrations greater than fifty micrograms per cubic meter of air (50 ug/m³) averaged over an 8-hour period.

Additionally, the SCDHEC require the use of specialized waste disposal sites if materials contain lead concentrations greater than or equal to (>) 0.7 mg/cm². It is imperative that these regulations be considered if any present or future demolition activities will impact LBP-containing bridge components.

INTRODUCTION

F&ME Consultants has completed an LBP Investigation for HDR, Inc. on the I-20 Bridge over Saluda River in Lexington County, South Carolina. This investigation was performed on February 13, 2019, into February 14, 2019.

It is our understanding that the existing bridge structure is scheduled for demolition as part of the Carolina Crossroads project. The scope of this LBP Investigation was to identify, analyze, and assess the condition of LBP or coated bridge components that may be affected by the demolition activities.

The results, conclusions and recommendations from this investigation are representative of the conditions observed at the site on the date of the field inspection. F&ME does not assume responsibility for any changes in conditions or circumstances that occur after the inspection. Use of this document for bidding purposes is not recommended without prior consultation with F&ME. No other environmental issues are addressed in this report.



INVESTIGATION RESULTS

The existing bridge structure (~657.0'L x 107.0'W, inside curb to inside curb), is located on I-20 and crosses over Saluda River in Lexington County, South Carolina. The actual date of construction for the original bridge structure is unknown. The bridge was widened from its original construction in the late 1980's. The structure is a six-lane bridge constructed with a poured-in-place concrete bridge deck, with concrete curb and gutters, and consists of nine (9) bridge deck spans. The original bridge deck spans are supported by fourteen (14) precast horizontal concrete beams, concrete diaphragms and is supported by three (5) concrete piers with pour in place concrete bent caps. The widened section of the bridge is supported by five (5) precast horizontal beams and concrete diaphragms supported by two (2) concrete columns. End bents are constructed with a vertical concrete walls and wing walls, and have soil and concrete covering the piles with only the top of the concrete bent cap exposed. Galvanized guardrails and posts are attached to both ends of the bridge. The bridge approaches on each end of the bridge consist of a six-lane asphalt paved roadway.

Our LBP Investigation sampling protocol consisted of randomly selecting bridge components on the subject bridge and scanning them with our Heuresis X-Ray Fluorescence (XRF) Portable Analyzer (Model # Pb200i, Serial #1888).

The results from the XRF quantitative testing indicate that lead is present in paint and/or coatings at levels that equal to or exceed the SCDHEC threshold for lead (0.7 mg/cm^2) in the following bridge component associated within the areas of this LBP investigation:

- Beam Bearing Plates (thick and thin)
- Pipe Support Channels

For more information regarding the specific descriptions and locations of the items that were scanned, refer to the Appendix C – XRF Data. Also, Appendix D – Site Photographs, shows top and underside views of the bridge. Appendix E - Personnel Certification, is included to show F&ME qualifications with regards to LBP Investigations.



RECOMMENDATIONS

The results, conclusions and recommendations from this investigation are representative of the conditions observed at the site on the date of the field inspection. F&ME does not assume responsibility for any changes in conditions or circumstances that occur after the inspection. This report has been prepared exclusively for HDR, Inc. and shall not be disseminated in whole or part to other parties without prior consent from HDR, Inc. or F&ME Consultants, Inc. No other environmental issues were addressed as part of this report.

The results from this LBP Investigation indicate that lead is present in paint and/or coatings at levels that equal to or exceed the SCDHEC threshold limit for lead (0.7 mg/cm^2) on the beam bearing plates, and pipe support channels. Some components tested positive for lead at levels that would be a concern under OSHA regulations. Therefore, OSHA regulations and procedures should be followed when handling these components. Refer to the blue highlighted components listed on the XRF Data Summary Table found in Appendix C for a list of these items.

It is important to ensure that the debris generated from the demolition activities is handled and disposed of appropriately. The proper handling and disposal procedures depend on the type of substrate (e.g., metal, wood, masonry block, etc.). To reduce and/or eliminate the generation of lead-containing dust, and residue, it is recommended that cutting, sanding and grinding be kept to a minimum, and to the extent practicable, the substrate materials should be removed intact. Metal components painted with and/or containing lead, such as the beam plates may be recycled, if they are taken to a recycling facility that accepts lead painted and/or lead-containing material.

Components found to contain lead should be handled appropriately. It is recommended that work tasks which require grinding, sanding, cutting torch, or other disturbance of the LBP surfaces identified herein be performed in accordance with federal regulations pertaining to worker protection from exposure to LBP. When lead containing items are disturbed or begin to decay they become a concern regarding human health and the environment. The typical routes of exposure to lead are through the inhalation or ingestion of lead-contaminated materials. Minimal risk of exposure exists where the lead-containing paint and coating are intact (e.g., has not been aerosolized, free of chipping or flaking, etc.).

As stated previously, OSHA regulates any measurable level of lead ($\geq 0.01 \text{ mg/cm}^2$), as it may pose a substantial exposure hazard to workers. Therefore, in these situations, OSHA regulations and safety procedures should be followed. These regulations also list the proper personal protective equipment to be used by the workers disturbing the LBP items and the requirements for personal air monitoring. OSHA's exposure action level (AL) for lead, regardless of respirator use, is an airborne concentration of $30 \mu\text{g/cm}^3$, averaged over an eight-hour period. The action level (AL) is the level at which an employer must begin specific compliance activities as outlined in OSHA's lead standards. By OSHA standards and regulations, the employer shall ensure that no employee is exposed to lead at concentrations greater than fifty micrograms per cubic meter of air ($50 \mu\text{g/m}^3$) averaged over an 8-hour period which is the permissible exposure level (PEL).



SCDHEC regulates the proper disposal of LBP and associated debris. SCDHEC defines two types of LBP debris. The first is *LBP waste*, which is defined as material such as wood, brick and metal that is painted with LBP. The other is *LBP residue* which is defined as residue that is generated from the removal (e.g., scraped, chipped, sandblasted, or chemical) of LBP from a structure. *LBP waste* that comes from a commercial or residential facility may be disposed of in either a class 2 or 3 landfill, while *LBP residue* from a commercial facility must have a toxicity characteristic leaching procedure (TCLP) analysis to determine the lead content. TCLP analysis is used to determine whether a waste is a characteristic hazardous waste due to leachability under the South Carolina Hazardous Waste Management Regulations. *LBP residue* with a TCLP analysis result greater than or equal to five milligrams per liter (≥ 5 mg/l) lead must be disposed of in a Subtitle C landfill (Hazardous Waste). However, *LBP residue* from a commercial facility with a TCLP analysis result less than five milligrams per liter (< 5 mg/l) lead is required to be disposed of in a Class 3 landfill.

Should any hidden and/or inaccessible components suspected to have LBP be encountered during demolition activities, the contractor performing the work is advised to stop work, follow proper procedures and precautions relating to LBP, and contact F&ME Consultants at (803) 254-4540 for an immediate response action.



APPENDICES

Appendix A – Site Vicinity Map

Appendix B – General Bridge Plan

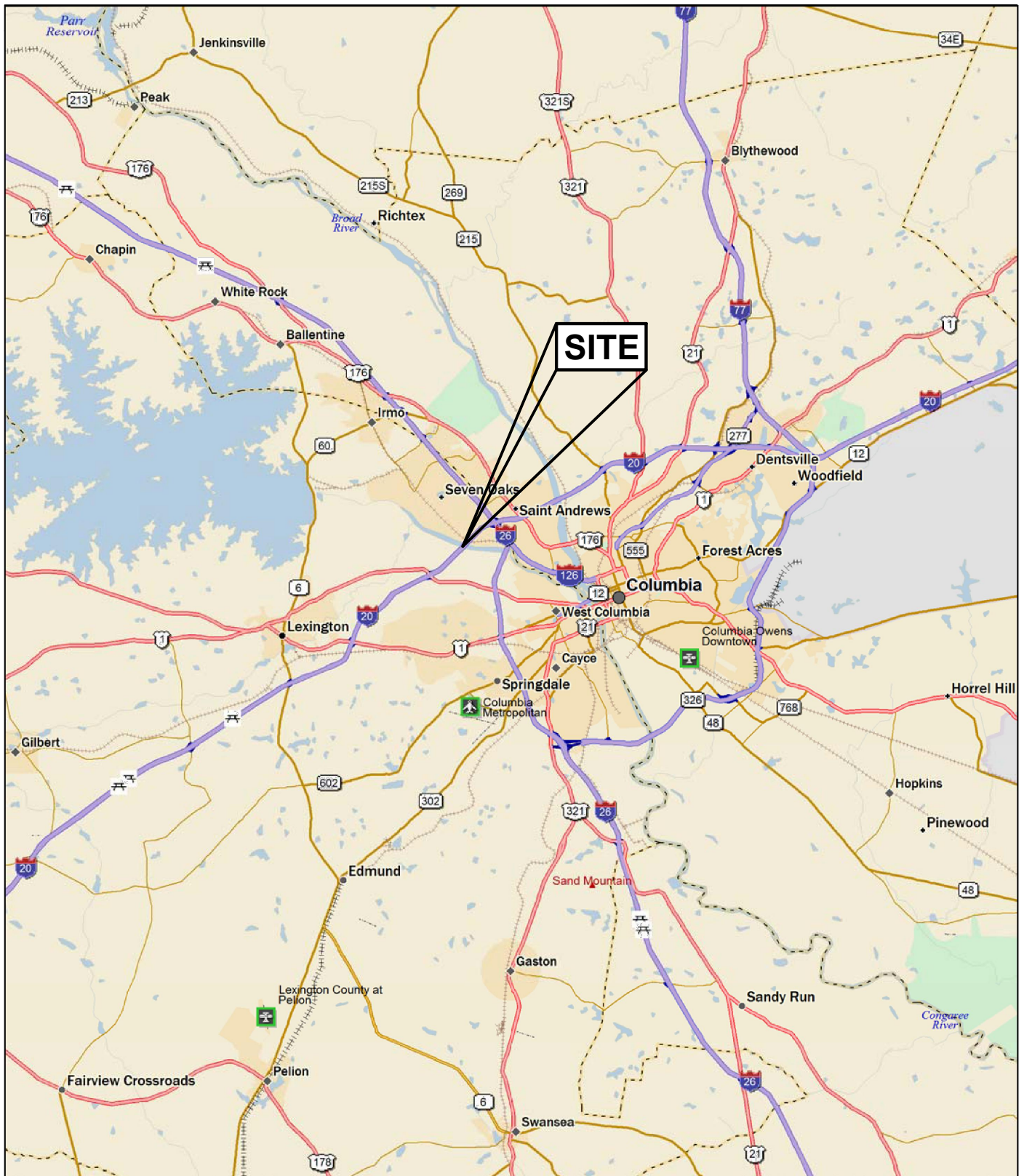
Appendix C – XRF Data

Appendix D – Site Photographs

Appendix E – Personnel Certification



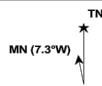
Appendix A
Site Vicinity Map



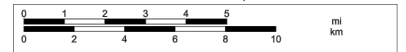
Data use subject to license.

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Scale 1 : 300,000



1" = 4.73 mi

Data Zoom 9-4

FIGURE NUMBER:

1

F&ME CONSULTANTS PROJECT NUMBER:

G5662.010

LEAD-BASED PAINT INVESTIGATION

I-20 over the Saluda River

Lexington County, SC

Site Vicinity Map

Prepared for: HDR, Inc.
3955 Faber Place Drive, Suite 300
North Charleston, SC 29405

F&ME CONSULTANTS

1825 Blanding Street
Columbia, SC 29201

ORIGINAL:
February 18, 2019

REVISIONS:

1

2

3

SCALE:
AS SHOWN

DRWN. BY: CTC

CHKD. BY: JSL

APPR. BY: GME

NOTES:

Appendix B

General Bridge Plan

Appendix C

XRF Data

Appendix C – XRF Data
Date Scanned: 02/13/2019
I-20 Bridge over Saluda River

Scan No.	Component	Substrate	Side	Condition	Color	Pbc (mg/cm ²)
1	Calibrate					1.00
2	Calibrate					1.00
3	Calibrate					1.03
4	Thick Beam Plate	Metal	B	Intact	Grey	1.25
5	Thick Beam Plate	Metal	B	Intact	Grey	1.25
6	Thick Beam Plate	Metal	Center	Intact	Grey	0.84
7	Thick Beam Plate	Metal	Center	Intact	Grey	0.82
8	Tie Rod Plate	Metal	B	Deteriorated	Grey	LOD
9	Tie Rod Plate	Metal	B	Deteriorated	Grey	LOD
10	Tie Rod Plate	Metal	B	Deteriorated	Grey	LOD
11	Thin Beam Plate	Metal	Center	Intact	Grey	0.74
12	Thin Beam Plate	Metal	Center	Intact	Grey	0.74
13	Thin Beam Plate	Metal	Center	Intact	Grey	0.57
14	Thin Beam Plate	Metal	Center	Intact	Grey	0.44
15	Pipe Support Channels	Metal	B	Intact	Grey	0.77
16	Pipe Support Channels	Metal	B	Intact	Grey	0.77
17	Pipe Support Channels	Metal	B	Intact	Grey	0.48
18	Pipe Support Channels	Metal	B	Intact	Grey	0.68
19	Tie Rod Plate	Metal	B	Peeling	Grey	LOD
20	Tie Rod Plate	Metal	B	Peeling	Grey	LOD
21	Tie Rod Plate	Metal	B	Peeling	Grey	LOD
22	Calibrate					0.98
23	Calibrate					0.98
24	Calibrate					0.97

LOD (Limit of Detection) = 0.1 mg/cm²

Blue text indicates any concentrations of LBP which OSHA considers a potential exposure risk when removed.

Red text indicates concentrations of LBP that have specific disposal requirements regulated by SCDHEC.



Appendix D

Site Photographs



Photo 1. East Side View of bridge



Photo 2. Top of Bridge Deck View



Photo 3. LBP Positive Thick Beam Plate



Photo 4. LBP Positive Thin Beam Plate



Photo 5. LBP Positive Pipe Support Channels



Appendix E

Personnel Certification

United States Environmental Protection Agency

This is to certify that



Jeffrey S Leary

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 as:

Inspector

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 July 29, 2021

LBP-I-18721-1

Certification #

April 17, 2018

Issued On

A handwritten signature in black ink, appearing to read "Adrienne Priselac".

Adrienne Priselac, Manager, Toxics Office
Land Division

