



# Northeast District Department of Health

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## SITUATION UPDATE

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### Lead Hazard Response Activities and Inspections at The Lofts at Cargill Falls Mill

(BROOKLYN) – The Northeast District Department of Health (NDDH) is reporting on response activities and test results received to date related to the ongoing lead hazard response at The Lofts at Cargill Falls Mill in Putnam. Visit <https://www.nddh.org/services/environment-building/lead-poisoning-prevention/> for additional information and resources.

- NDDH received an abatement plan from the property owner for the first unit identified with lead on Friday, January 13, 2023. An NDDH abatement plan approval dated January 19, 2023 was issued to the lead abatement contractor and copied to the property owner. An additional order will be issued for the presence of lead identified in other units and areas.
- NDDH is required by State statute to perform comprehensive inspections in units that house children under the age of 6 as well as common interior and exterior areas. These inspections include collection of dust wipe\* and water samples, XRF testing\*\*, and exterior soil samples. Comprehensive inspections have been conducted in nine (9) residential units with children under the age of 6.
- NDDH has not identified any other units with children under the age of 6. The property owner and management company has been informed that NDDH must be notified if families with children under the age of 6 move in during the inspection and/or abatement process.
- NDDH is responsible per regulations to provide environmental test results to the property owner and DPH. While there is no regulatory responsibility or requirement for NDDH to inform tenants, we are notifying them directly of test results.
- NDDH was invited to attend a tenants' meeting on January 17, 2023 to respond to tenant questions. The meeting was held off-site in a larger space at the request of the health department due to gathering concerns related to the spread of COVID-19, flu, and other respiratory illnesses. The meeting was attended by approximately 25 residents. NDDH addressed questions related to the role of the health department, health concerns, the abatement process, timelines for compliance, cleaning techniques, and occasions during abatement where relocation should be considered.
- NDDH cannot and does not share private health information.

## Test Results as of 1/19/23:

- **Comprehensive Inspections** (included dust wipes, water, soil samples and XRF testing)
  - Dust wipe results received on 8 of 9 units.
    - 5 units had levels detected above dust lead hazard standards
    - 3 units had levels detected below dust lead hazard standards.
  - Water samples – Results received on 9 out of 9 units, all within acceptable limits
  - XRF Testing – Results received on 8 of 9 units. Toxic levels of lead\*\*\* were detected in some of the samples taken from 6 units. Toxic levels of lead were not detected in samples taken from two units. NDDH is in the process of notifying tenants of these results.
- **Exterior soil samples** – Results pending on soil samples taken on 1/5/23 from the river embankment area near the parking lot and gazebo area.
- **3 Risk Assessments** (included dust wipe sampling, visual inspections, and a water sample taken from one business suite)
  - Dust wipe results received on 2 out of 3 locations assessed
    - Residential unit had levels detected above dust lead hazard standards
    - Business suite had levels detected below dust lead hazard standards
  - Water sample from business suite within acceptable limits
- **15 Visual Inspections** completed as of 1/19/23

### Interior common areas – hallways, entry ways

- Dust wipe results received for first floor of building #2 indicated levels below dust lead hazard standards

## Definitions/Notes:

**\*Dust wipe samples** – Positive results do not necessarily mean that lead paint is present in the unit, only that there is lead detected *in the dust*. This is an important distinction because that dust could have come from repair activities, been tracked in from contaminated outdoor soil, or even brought in from lead dust on clothing worn at a job site. Settled lead dust can re-enter the air when the areas are vacuumed or swept, or people walk through it.

- EPA Dust-Lead Hazard Standards – These are standards for lead in dust on floors and windowsills to protect children from the harmful effects of lead exposure. The lead hazard standards help property owners, lead paint professionals, and government agencies identify lead hazards in residential paint, dust and soil.
- EPA Dust-Lead Clearance Levels - Clearance levels are defined as values that indicate the amount of lead in dust on a surface following completion of an abatement activity. EPA's clearance levels are 10 micrograms ( $\mu\text{g}$ ) of lead in dust per square foot ( $\text{ft}^2$ ) for floor dust and 100  $\mu\text{g}/\text{ft}^2$  for windowsill dust, significantly lower than the previous levels of 40  $\mu\text{g}/\text{ft}^2$  for floor dust and 250  $\mu\text{g}/\text{ft}^2$  for windowsill dust.

## **\*\*What is X-ray Fluorescence (XRF)?**

- XRF is a method of determining the elemental composition of materials. When it comes to housing and environmental safety, professionals use XRF analyzers specifically to measure the concentration of elemental lead in old paint.
- This method fires x-ray beams at a paint sample to “knock” electrons out of orbit. When this happens, a certain amount of energy is released — this energy is unique to each element. The XRF analyzer detects these individual bursts of energy to calculate how much of each element is present within the sample.
- XRF is the only reliable, non-destructive technique for testing lead-based paint. Because x-rays easily penetrate the surface of paint samples, XRF analysis can detect traces of lead even when buried under multiple layers of paint.
- That means it doesn’t require removing samples in order to take measurements, nor does it require marking or damaging the surface (which can potentially release dangerous lead dust).
- With handheld XRF analyzers, each measurement only takes a matter of seconds and allows lead inspectors to quickly and safely test a large number of paint surfaces in a relatively short amount of time.

**X-ray Fluorescence (XRF) results** –Any lead reading equal to or greater than 1.0 milligrams of lead per square centimeter (1.0mg/cm<sup>2</sup>) is considered positive for toxic levels of lead.

**CT Department of Health Lead Poisoning Prevention and Control Regulations** can be found at [https://portal.ct.gov/-/media/SOTS/regulations/Title\\_19a/111pdf.pdf](https://portal.ct.gov/-/media/SOTS/regulations/Title_19a/111pdf.pdf).

**\*\*\*Toxic level of lead** - The full definition can be found in Sec. 19a-111-1, definition #59. It reads, in part: “Toxic level of lead” means a level of lead that: ...(B) when present in a dried paint, plaster or other accessible surface on or in a residential dwelling contains equal to or greater than 1.0 milligrams lead per square centimeter of surface as measured on site by an X-ray fluorescence analyzer or another accurate and precise testing method that has been approved by the commissioner.”

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