Colorado Department of Human Services / Eric Wilson

<table>
<thead>
<tr>
<th>HERRON™ Project No.: 0317164</th>
</tr>
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<tbody>
<tr>
<td>Job No.: Verbal</td>
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<tr>
<td>Location: UCD - Sheridan Clinic Hazardous Material Survey, G1, G3 Wings, 3525 W. Oxford Ave., Denver, CO 80236 / CDHS</td>
</tr>
<tr>
<td>Dates of Service: March 15-21, 2017</td>
</tr>
<tr>
<td>Services Requested: Environmental Consultation/Limited Lead Based Paint Screening</td>
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</table>

May 21, 2017

Per Client request, and under the guidelines defined, HERRON™ Enterprises USA, Inc. (HERRON™) has concluded the Environmental Consultation/Limited Lead Based Paint Screening at the aforementioned property.

Local, state and/or federal regulations, including but not limited to State of Colorado Air Quality Control Division (AQCC) Regulation 19, 29 CFR 1926.62 (OSHA), EPA 40 CFR Part 745 RRP Rule, and/or Department of Housing and Urban Development (HUD) Title X (as applicable) may require a comprehensive lead based paint inspection prior to a renovation or demolition. This inspection requires an EPA and State certified lead based paint building inspector identifying and sampling any suspect lead based paint materials which could be affected by the activity.

HERRON™ was contracted by the Client, to perform:

1. The Client has advised that UCD - Sheridan Clinic Hazardous Material Survey, G1, G3 Wings, 3525 W. Oxford Ave., Denver, CO 80236 / CDHS is for identification purposes;
   a. Limited to locations of the submitted plans, where applicable. Any locations/materials not specifically identified, assumed to be a Regulated Lead Based Paint (LBP) Material, and should be inspected prior to any activity which may disturb the material;
   b. Limited Lead Based Paint Screening, specifically tailored to a ‘presence’/’non-presence’ of suspect Lead Based Paint (LBP);
      i. Refer to materials identified in the report;
      ii. Quantification based on area as submitted by Client plans, where applicable.
   c. Review and usage (where applicable) of previous inspections submitted by the Client, or performed by HERRON™ and/or subsequent addenda for all LPB and Non-LBP Materials;
      i. Not applicable.
   d. ‘All’ EPA suspect Materials not requested;
      i. Limited to locations of the submitted plans, where applicable. Any locations/materials not specifically identified, assumed to be a Regulated Lead Based Paint Material, and should be inspected prior to any activity which may disturb the material;
         1. Refer to materials identified in the report;
         2. Locations assumed to be a Regulated Lead Based Paint Material, and should be inspected prior to any activity which may disturb the material;
         3. Inspection does not take into consideration any areas outside of the inspection area(s);
         4. All materials not previously indicated by Client.
   e. Non-destructive building material sampling;
   f. Real Time XRF Analyses;
It is expressly advised that a limited screening is designed to indicate the presence of Lead Based Paint Materials in the Building(s), and under normal the guidelines defined, specific samples and locations have been instructed and authorized by the Client. Although some material may indicate that Lead is not present in this report, and under the protocol of limited sampling whereas not ‘all’ suspect materials were sampled, under local, state and/or federal regulations, including but not limited to AQCC Regulation 19, EPA RRP Rule, and OSHA 29 CFR 1926.62, a certain protocol for sampling, number of samples obtained, and assessment is required, and therefore, these materials are considered suspect until such a time that said protocol is adhered to.

2. HERRON™ was subsequently contracted by the Client, to perform:
   a. Not applicable.

   a. No. Buildings on site: 2
   b. Year built: Unknown
   c. The current building(s) area is approximately square feet: Unknown
   d. Property type: Medical Facility
   e. Date of inspection: March 15-21, 2017
   f. Name, address, and telephone number of the owner or owners:
      Colorado Department of Human Services
      Eric Wilson
      North Central District Facilities Management
      4112 South Knox Court
      Denver, Colorado 80236-3101
      Phone: (303) 866-7278 / Fax: (303) 866-7215
      Email: eric.wilson@state.co.us

4. Certified Firm:
   a. HERRON™ Enterprises USA, Inc.
      State of Colorado Lead Evaluation Firm: LEF#10642
      L.P. (Lennie) Herron, Certified Inspector/Risk Assessor, Certification #8909
      Billie J. Herron-Lusk, Certified Inspector/Risk Assessor, Certification #9238
      Jamie L. Herron-Carson, Certified Inspector, Certification #20944
      Sherri K. Herron, Certified Inspector, Certification #17198
      Michael W. Herron, Sr., Certified Inspector, Certification #20943
      7261 W. Hampden Ave., Lakewood, CO 80227-5305
      (303) 763-9639 / Fax (303) 763-9686
      Email: Lennie.Herron@comcast.net
      Website: www.HERRON-Enterprises.com
   b. Testing method and device and/or sampling procedure employed for paint analysis;
      i. NITON XLp 303A XRF, Serial #99522
Closure

This report is provided for the use of the Client as it applies to the subject property. Its preparation has been in accordance with generally accepted practices in hazardous materials, indoor air quality, and industrial hygiene.

Thank you for the opportunity to be of service. Should you have any questions or comments regarding this report, please do not hesitate to call HERRON™ Enterprises USA, Inc.

Sincerely,

Jamie L. Herron-Carson
Project Manager
HERRON™ Enterprises USA, Inc.

Personnel: Billie J. Herron/Project Manager, Industrial Hygienist Technician, Jamie L. Herron-Carson/Project Manager, Industrial Hygienist Technician, Sherri K. Herron/Project Manager, Industrial Hygienist Technician, Destiny M. Herron, Administrative Assistant
**Recommendations**

The Client has advised that **UCD - Sheridan Clinic Hazardous Material Survey, G1, G3 Wings, 3525 W. Oxford Ave., Denver, CO 80236 / CDHS** is for identification purposes.

As Lead Based Painted Materials (LBP) Materials were not discovered during the inspection, further action is not required.

HERRON™ would recommend as a minimum Plan of Action:

1. **Management Plan** (not applicable should any Lead Based Paint Spill Response Actions be required): a site specific Management Plan to include an Operations and Maintenance Program (O&M) which could effectively manage the material, dependent on the use of the structure, occupants, etc.

   **Concealed Materials –**

   Based on the nature of the Lead Based Paint which could be concealed, it is recommended:

   Extensive ‘destructive’ sampling and quantification of these materials throughout the property in order to determine if concealed locations contain a Lead Based Paint or if isolated to a specific era of remodeling;

   or

   If extensive ‘destructive’ sampling and quantification of these materials is not possible, and presumptions that concealed locations are potentially Lead Based Paint, then it is recommended that a site specific Management Plan be developed and implemented which could effectively manage the future renovations of the property. A Management Plan can be designed to review specific locations of renovation locations, i.e., destructive sampling and quantification through concealed chases, and under carpeting prior to disturbance of these areas by the Owner or Contractors which will assist in the recognition and response to potential health risks from concealed Lead Based Paint.

Should a renovation or demolition occur which could affect locations that are potentially Lead Based Paint materials, concealed materials, and/or materials that were outside of the scope of work as indicated by the Owner, HERRON™ would recommend as a minimum Plan of Action:

1. **Comprehensive Lead Based Paint Building Inspection:** a continuous process in areas which may not have been accessible, or for materials which may have been concealed in previous inspections, may be required, i.e., review and usage of previous Lead Based Paint Inspection(s), identification of suspect materials, approximate quantities, discovery sampling in areas which will be affected by the renovation/demolition in order to determine the presence of Lead Based Paint, etc.

2. **Lead Based Paint Abatement Project Design (Plan of Action):** coordinated with Owner should be developed in order to direct areas and quantities of removal for renovation or demolition purposes.

3. **Lead Based Paint Abatement (to facilitate renovation or demolition):** coordinated with Client, should the material be required to be removed prior to renovation or demolition activity.

4. **Lead Based Paint Monitoring:** of project on behalf of Client, i.e., compliance to local, state, and/or federal regulations (as applicable), i.e., compliance, visual inspections, monitoring, air/wipe sampling, etc.

5. **Renovation or Demolition:** Lead Hazard Disposal Determination by Toxicity Characteristic Leachate Procedure (TCLP) may be required should Lead Based Paint materials be discovered, prior to renovation or demolition.
Conclusions

The Client has advised that UCD - Sheridan Clinic Hazardous Material Survey, G1, G3 Wings, 3525 W. Oxford Ave., Denver, CO 80236 / CDHS is for identification purposes.

Based on the information generated by this report, we conclude that the inspection locations of the aforementioned property does not contain Regulated Lead Based Paint Material(s) (LBP), in accordance with local, state, and/or federal regulations:

1. None detected.

Paint Chip Samples:

1. Not applicable.

Although a material may have been determined to contain < ‘action level’ of 1.0 mg/cm², by XRF, or 0.5% by weight, by NIOSH 7042 (AAS), traces of Lead Based Paint on surfaces, which is not considered Regulated Lead Based Paint by State of Colorado Air Quality Control Division (AQCC) Regulation 19, EPA 40 CFR Part 745 RRP Rule, and/or Department of Housing and Urban Development (HUD) Title X (as applicable), may still be regulated by OSHA. OSHA regulations may apply during potential disturbance activities, and the inspection document will serve as a Hazard Communication and should be reviewed during an activity such as a renovation or demolition, to ensure that an exposure does not occur.

It is understood that there may be Regulated Lead Based Paint (LBP) in other locations, in accordance with 29 CFR 1926.62 (OSHA), and/or may require a more specific protocol as required under the State of Colorado Air Quality Control Division (AQCC) Regulation 19, EPA 40 CFR Part 745 RRP Rule, and/or Department of Housing and Urban Development (HUD) Title X for Child Occupied Facilities. Requests for the services provided are specific to an inspection of the demolition only, however, the Client understands that additional services may be required dependent on the intent of the use and impact of the property.

This document serves as a certified notification to the owner/operator of the facility and the demolition contractor that any Lead Based Paint Material allowed to stay in the facility must remain below the action level of Lead Hazard Disposal Determination by Toxicity Characteristic Leachate Procedure (TCLP), as applicable during renovation or demolition.

All building material field information concerning sampling protocols, locations, assessments, etc. is available in our files for Client use should the need arise.

Suspect materials which were sampled and determined to contain < the ‘action level’ of 0.5% by weight, by NIOSH 7042 (AAS) has been described and itemized in the attached NITON table/laboratory certifications.

Suspect materials which were not within the Scope of Work at the time of the inspection were:

1. ‘All’ EPA suspect Materials not requested;
   a. Limited to locations of the submitted plans, where applicable. Any locations/materials not specifically identified, assumed to be a Regulated Lead Based Paint Material, and should be inspected prior to any activity which may disturb the material;
      i. Refer to materials identified in the report;
      ii. Locations assumed to be a Regulated Lead Based Paint Material, and should be inspected prior to any activity which may disturb the materials;
      iii. Inspection does not take into consideration any areas outside of the inspection area(s);
      iv. All materials not previously indicated by Client.

2. ‘Any’ confirmed or suspect LBP which may have been concealed at the time of the inspection.
3. During a normal inspection, and more specifically when non-destructive sampling techniques are employed, it is not within the scope of the inspection to remove surface materials to inspect or quantify the structures and/or materials which may be under the surface, i.e., within or under concealed areas such as under carpet, under sub-floors, within chases, walls, crawlspaces, tunnels, etc., to remove suspect Lead Based Paint Material(s), to move and/or sample electrical wiring which has not been 'locked out', etc. All said areas are to be assumed as containing 0.5% Lead by weight by AAS or ICP, or 1.0 mg/cm² Lead by XRF, until such a time that these areas are made accessible, and/or rendered safe so that sampling can be performed. Prior to renovations or demolition of these areas, it is recommended that a more destructive protocol be utilized in order to make these determinations:

Concealed Materials –

Based on the nature of the Lead Based Paint which could be concealed, it is recommended:

- Extensive ‘destructive’ sampling and quantification of these materials throughout the property in order to determine if concealed locations contain a Lead Based Paint or if isolated to a specific era of remodeling;

or

- If extensive ‘destructive’ sampling and quantification of these materials is not possible, and presumptions that concealed locations are potentially Lead Based Paint, then it is recommended that a site specific Management Plan be developed and implemented which could effectively manage the future renovations of the property. A Management Plan can be designed to review specific locations of renovation locations, i.e., destructive sampling and quantification through concealed chases, and under carpeting prior to disturbance of these areas by the Owner or Contractors which will assist in the recognition and response to potential health risks from concealed Lead Based Paint.

4. HERRON™ recommends extreme caution during a renovation or demolition of these areas in the event that an area which was not suspect, visible, accessible and/or specified during the inspection, is discovered to contain or is suspected of containing a Lead Based Paint Material (LBP). Under local, state and/or federal regulations, should such an event occur, the Owner and or Contractor is required to cease operations which may effect this (these) material(s) until an inspection is concluded and a determination is made by an State Certified Lead Based Paint Inspector.

5. It is expressly advised that a limited screening is designed to indicate the presence of Lead Based Paint Materials in the Building(s), and under normal the guidelines defined, specific samples and locations have been instructed and authorized by the Client. Although some material may indicate that Lead is not present in this report, and under the protocol of limited sampling whereas not ‘all’ suspect materials were sampled, under local, state and/or federal regulations, including but not limited to AQCC Regulation 19, EPA RRP Rule, and OSHA 29 CFR 1926.62, a certain protocol for sampling, number of samples obtained, and assessment is required, and therefore, these materials are considered suspect until such a time that said protocol is adhered to.

6. Disturbance of these areas could create a potential health hazard.

Suspect materials which were visually inspected and determined to be Non-LBP materials at the time of the inspection were:

1. Each material reading has been described and itemized in the attached NITON table.
Inspection Methodology:

1. HERRON™ performed the Environmental Consultation of the property, and collected samples according to local, state and/or federal regulations, and/or accepted industry practices. Each material reading has been described and itemized for your use in the following tabular format. For those materials and test results which met or exceeded the ‘action level’ of 1.0 mg/cm², or was ‘inconclusive’ by XRF, or the ‘action level’ of 0.5% by weight, by NIOSH 7042 (AAS), the tabular line item has been indicated as ‘Positive’ per the attached Niton XTRAS table format. Suspect materials and test results which were below the ‘action’ level of 1.0 mg/cm² by XRF, or the ‘action level’ of 0.5% by weight, by NIOSH 7042 (AAS), the tabular line item has been indicated as ‘Negative’, per the attached Niton XTRAS table format (Note: Readings were performed with THERMO NITON XLP, Serial #26550).

2. Information presented by the manufacturer NITON in regards to the NITON Program/XRF Operation: although the PBe, PBi and PBk readings which is included in the data reports show <LOD (limit of detection), the operation of an XRF includes what is termed error correction (the XRF is self-correcting which means that the operator does ‘not’ apply a correction to the sample, or substrate). The program/operation calculates the PBI and PBk of <LOD and the +/- error correction mathematically. Should this correction achieve the action level of 1.0 mg/ml, the material is considered ‘Positive’ for lead. Multiple error corrections in regards to the raw data is not included.
Note: Plan copied by permission, not to scale.
Note: Plan copied by permission, not to scale.
Assumptions, and Limitations

This Environmental Consultation is applicable in whole, not in part, to the entire contents of the document.

HERRON™ and this Environmental Consultation make no representation or assumptions as to past and/or future conditions/occurrences of the specific area(s) inspected.

The results, conclusions and/or recommendations expressed in this Environmental Consultation are based solely on the conditions which were observed at the time of this Environmental Consultation.

HERRON™ inspection incorporated non-destructive sampling techniques and visual inspections in areas which were visible/accessible. Conditions and/or materials which were not inspected and/or commented on may very well differ from those which were inspected and/or commented on.

HERRON™ selected sample locations and frequency of sampling based on observations, your requirements and/or the assumption that like materials in the same area are homogeneous.

HERRON™ has specifically designed this Environmental Consultation for Client use in the location and identity of Hazardous Materials, and under no circumstances is this Environmental Consultation to be copied, used as a bidding tool and/or used for the development of an Hazardous Materials Remediation Specification document without the express written permission of an executive officer of HERRON™.

HERRON™ is not responsible/liable for any opinions, conclusions and/or recommendations as provided by others based on any means presented in this Environmental Consultation.

With use of Environmental Consultation, and/or use of any services offered by HERRON™, Client(s) agrees that HERRON™ has been given the authority by the Owner(s) of a property to enter the aforementioned premises, perform the services, utilize any and all floor plans, blue prints, etc., and agrees to indemnify, hold harmless, and defend HERRON™, its Officers, Employees, Assigns, etc. for any and all claims, costs or damages that may result from services contracted, etc.
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Limited Lead Based Paint Inspection (XRF #99522)
State LEF #10642
State Inspector: Billie J. Herron-Lusk/#9238

Date(s) of Inspection: March 15, 2017
Lead Evaluation Firm Certificate

This certifies that

Herron Enterprises USA, Inc.

LEF No.: 10642

has met the requirements of 25-7-1104, C.R.S. and Air Quality Control Commission Regulation No. 19, and is hereby certified by the state of Colorado to perform lead-based paint evaluation activities in the state of Colorado.

Issued: April 21, 2016
Expires: April 29, 2017
Certificate of Achievement

Billie Lusk
Herron Enterprises USA

Has successfully completed the Thermo NITON Analyzers LLC Manufacturer's Training Course and is now certified in operation, monitoring and machine maintenance of the NITON XRF Spectrum Analyzer.

Certificate issued by Thermo NITON Analyzers LLC.

Thermo
Electron Corporation

Victoria Jozefowski
Training Coordinator

Director of Training

003300000MR9ng
Certificate Number

2006 Sept 28 / Herron Enterprises
Date & Site of Course
Certifies that

Billie Lusk

Has successfully completed the required training hours and passed the examination required by the Colorado Department of Public Health and Environment for:

Lead-Based Paint Risk Assessor Refresher

For the purposes of accreditation under Regulation No. 19, Residential Lead-based Paint Hazard Reduction Act of 1992 (Title X) and other standards developed by the EPA pursuant to Title IV of TSCA

Course Date: March 7, 2017
Certificate No.: R17-226-LRA-CO
No. of Hours: 8
Expiration Date: March 7, 2020

Lauren York - Instructor
Danaya Benedetto - Training Program Manager
LEAD-BASED PAINT CERTIFICATION*

This certifies that

Billie J. Lusk

Certification No.: 9238

has met the requirements of 25-7-1104, C.R.S. and Air Quality Control Commission Regulation No. 19, and is hereby certified by the state of Colorado in the following discipline:

Risk Assessor*

Issued: April 22, 2014
Expires: April 22, 2017

* This certificate is valid only with the possession of a valid lead-based paint training certificate in the discipline specified above, issued by either a Colorado approved training provider, an EPA approved training provider, or a training provider approved by another EPA authorized program.

Authorized APCD Representative
SEAL
Certificate of Achievement

Jamie Herron-Johnson
Herron Enterprises USA

Has successfully completed the
Thermo NITON Analyzers LLC Manufacturer's Training Course
and is now certified in operation, monitoring and machine maintenance
of the NITON XRF Spectrum Analyzer.
Certificate issued by Thermo NITON Analyzers LLC.
Certifies that

Jamie Carson

Has successfully completed the required training hours and passed the examination required by the Colorado Department of Public Health and Environment for:

Lead-Based Paint Inspector Refresher

For the purposes of accreditation under the Colorado Department of Public Health and Environment Regulation No. 19 and other standard developed by EPA pursuant to Title IV of TSCA

Course Date: January 4, 2017
Certificate No.: R17-002-LI-CO
No. of Hours: 8
Expiration Date: January 4, 2020

Lauren York - Instructor
Danaya Benedetto - Training Program Manager

Certification not valid without watermark
LEAD-BASED PAINT CERTIFICATION*

This certifies that

Jamie L. Herron-Carson

Certification No.: 20944

has met the requirements of 25-7-1104, C.R.S. and Air Quality Control Commission Regulation No. 19, and is hereby certified by the state of Colorado in the following discipline:

Inspector*

Issued: March 01, 2017
Expires: March 07, 2020

* This certificate is valid only with the possession of a valid lead-based paint training certificate in the discipline specified above, issued by either a Colorado approved training provider, an EPA approved training provider, or a training provider approved by another EPA authorized program.
Certificate of Achievement

Sherri Herron
Herron Enterprises USA

Has successfully completed the
Thermo NITON Analyzers LLC Manufacturer’s Training Course
and is now certified in operation, monitoring and machine maintenance
of the NITON XRF Spectrum Analyzer.
Certificate issued by Thermo NITON Analyzers LLC.

[Signature]

Thermo
ELECTRON CORPORATION

[Signature]
Training Coordinator

[Signature]
Director of Training

Certificate Number: 0033000000MR9Ah
Date & Site of Course: 2006 Sept 28 / Herron Enterprises
Certifies that

Sherri Herron

Has successfully completed the required training hours and passed the examination required by the Colorado Department of Public Health and Environment for:

**Lead-Based Paint Inspector Initial**

For the purposes of accreditation under the Colorado Department of Public Health and Environment Regulation No. 19 and other standard developed by EPA pursuant to Title IV of TSCA

Course Date: October 12 - 14, 2015
Certificate No.: 15117L
No. of Hours: 24
Expiration Date: October 14, 2018

Lauren York - Instructor

Danaya Benedetto - Training Program Manager
LEAD-BASED PAINT CERTIFICATION*

This certifies that

Sherri Herron

Certification No.: 17198

has met the requirements of 25-7-1104, C.R.S. and Air Quality Control Commission Regulation No. 19, and is hereby certified by the state of Colorado in the following discipline:

Inspector*

Issued: October 19, 2016
Expires: October 21, 2018

* This certificate is valid only with the possession of a valid lead-based paint training certificate in the discipline specified above, issued by either a Colorado approved training provider, an EPA approved training provider, or a training provider approved by another EPA authorized program.