



**Former Rocky Mountain Gun Club
545 31 Road
Grand Junction, CO**

LEAD-IN-DUST WIPE SAMPLING REPORT – POST-REMEDICATION VERIFICATION

AUGUST 3, 2023

PREPARED FOR:

Classical Education Growth Fund
4690 Table Mountain Drive, Unit 100
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PREPARED BY:

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VERTEX PROJECT NO: 86796

TABLE OF CONTENTS

1.0 INTRODUCTION 3
2.0 SITE DESCRIPTION 3
3.0 DESCRIPTION OF WORK OPERATIONS 3
4.0 WIPE SAMPLING 3
5.0 LABORATORY ANALYSIS 7
6.0 DISCUSSION..... 8

APPENDIX A: LABORATORY RESULTS

APPENDIX B: FLOOR PLANS

1.0 INTRODUCTION

The Vertex Companies, LLC. (VERTEX) conducted limited surface wipe sampling for lead-in-dust on multiple dates for Ascent Classical Academies at the Former Rocky Mountain Gun Club located at 545 31 Road, Grand Junction, Colorado (the subject property). Services were provided at the request of the Client representative, Mr. Kurt Connolly with Anser Advisory, subsequent to professional decontamination activities performed by Hudspeth Inc. (Hudspeth). The VERTEX representatives for this project were Mr. Alexander E. Johnsen, CIH, Mr. Zack Westfall, and Mr. Mike Mithun.

2.0 SITE DESCRIPTION

The subject property consists of one, two-story commercial building that used to serve as a former indoor shooting range, classroom, retail area, and administration area. Also located on the property is a detached, single-level garage that presumably used to serve as a storage area. Hudspeth was retained to perform decontamination activities within both the two-story commercial building and the detached garage which included, but was not limited to, removal of flooring materials, ceiling tiles, and ductwork. Remaining surfaces and materials were decontaminated in a step-wise approach by Hudspeth following industry standard procedures for lead-in-dust remediation.

3.0 DESCRIPTION OF WORK OPERATIONS

On multiple dates in 2023, VERTEX performed a thorough visual inspection of surfaces within the contained work areas established by Hudspeth and then collected wipe samples to verify that lead-in-dust levels were below the Housing and Urban Development (HUD) lead clearance standards as well as Colorado Regulation 19 lead clearance standards (where applicable). VERTEX used laboratory supplied sampling equipment and submitted the samples under proper chain of custody to Environmental Protection Agency (EPA) National Lead Laboratory Accreditation Program (NLLAP) laboratories for third-party sample analysis.

4.0 WIPE AND SOIL SAMPLING

Wipe Sampling

One surface wipe sample using laboratory supplied media was collected from a delineated area of either 100 square centimeters or 1 square foot, where appropriate surface area was present. The sample was collected using nitrile gloves and then immediately placed into a laboratory supplied container for submission to the laboratory. Following is a table indicating the sample details and results.

Sample Number	Sample Date	Sample Location	Sample Area (ft ²)	Sample Results (ug/ft ²)	Recommended cleanup standard (ug/ft ²)
5-26-1	5-26-2023	2 nd floor – floor in NE classroom in NE corner	1	0.71	<10

Sample Number	Sample Date	Sample Location	Sample Area (ft ²)	Sample Results (ug/ft ²)	Recommended cleanup standard (ug/ft ²)
5-26-2	5-26-2023	2 nd floor – hallway floor by drinking fountain	1	13	<10
5-26-3	5-26-2023	2 nd floor – floor in men’s hallway restroom by stairs	1	19	<10
5-26-4	5-26-2023	2 nd floor – floor in SE office	1	BRL	<10
5-26-5	5-26-2023	2 nd floor – NE classroom window sill – 3 rd window from the west	0.107639	BRL	<100
5-26-6	5-26-2023	2 nd floor – SW office window sill	0.107639	BRL	<100
5-26-7	5-26-2023	N/A – 1 aliquot blank	N/A	N/A*	N/A
5-26-8	5-26-2023	N/A – 1 aliquot blank	N/A	N/A*	N/A
6-1-1	6-1-2023	1 st floor – former retail area floor in NE corner by door	1	6.4	<10
6-1-2	6-1-2023	1 st floor – former retail area floor on the west side near the stairs to 2 nd level	1	12	<10
6-1-3	6-1-2023	1 st floor – former retail area – floor in men’s restroom	1	71	<10
6-1-4	6-1-2023	1 st floor – member’s lounge – floor in east ½	1	13	<10
6-1-5	6-1-2023	1 st floor – member’s lounge – women’s restroom floor by west sink	1	20	<10
6-1-6	6-1-2023	1 st floor – member’s lounge floor by west hallway near archery range	1	22	<10
6-1-7	6-1-2023	N/A – 1 aliquot blank	N/A	BRL	N/A
6-1-8	6-1-2023	N/A – 1 aliquot blank	N/A	BRL	N/A
6-6-1	6-6-2023	2 nd floor – floor by west wall by drinking fountain in hallway	1	18	<10
6-6-2	6-6-2023	2 nd floor – center of men’s hallway restroom on floor	1	12	<10
6-6-3	6-6-2023	1 st floor – west end of member’s lounge on floor	1	15	<10
6-6-4	6-6-2023	1 st floor – east end of member’s lounge on floor	1	<10	<10
6-6-5	6-6-2023	1 st floor – center of retail space on floor	1	<10	<10
6-6-6	6-6-2023	1 st floor – north end of member’s lounge by kitchen sink on floor	1	11	<10
6-6-7	6-6-2023	N/A – 1 aliquot blank	N/A	BRL	N/A
6-6-8	6-6-2023	N/A – 1 aliquot blank	N/A	BRL	N/A
6-14-1	6-14-2023	1 st floor retail space – west side floor by range entrance	1	5.2	<10
6-14-2	6-14-2023	1 st floor retail space – middle area on floor between support columns	1	8.4	<10
6-14-3	6-14-2023	1 st floor member’s lounge – floor by fridge	1	13	<10

Sample Number	Sample Date	Sample Location	Sample Area (ft ²)	Sample Results (ug/ft ²)	Recommended cleanup standard (ug/ft ²)
6-14-4	6-14-2023	1 st floor – member’s lounge on kitchen floor	1	13	<10
6-14-5	6-14-2023	2 nd floor – floor in men’s restroom by stairs to lower level	1	2.3	<10
6-14-6	6-14-2023	2 nd floor – hallway floor by drinking fountain	1	1.9	<10
6-14-7	6-14-2023	1 st floor tactical area – floor on south side	1	32	<10
6-14-8	6-14-2023	1 st floor tactical area – floor on north side	1	38	<10
6-14-9	6-14-2023	1 st floor – floor in men’s restroom of tactical area	1	83	<10
6-14-10	6-14-2023	1 st floor – floor in women’s restroom of tactical area	1	28	<10
6-14-11	6-14-2023	1 st floor gunsmith room floor	1	18	<10
6-14-12	6-14-2023	2 nd floor storage area in tactical area	1	6.5	<10
6-14-13	6-14-2023	N/A – 1 aliquot blank	N/A	BRL	N/A
6-14-14	6-14-2023	N/A – 1 aliquot blank	N/A	BRL	N/A
6-21-1	6-21-2023	1 st floor member’s lounge – floor in middle of room	1	16	
6-21-2	6-21-2023	1 st floor tactical area – floor in tactical area in north half	1	18	<10
6-21-3	6-21-2023	1 st floor tactical area – floor in SW portion	1	8.8	<10
6-21-4	6-21-2023	1 st floor – floor in loading dock of tactical area	1	9.0	<10
6-21-5	6-21-2023	1 st floor – floor in gunsmith room	1	7.0	<10
6-21-6	6-21-2023	1 st floor – men’s restroom near tactical area	1	13	<10
6-21-7	6-21-2023	N/A – 1 aliquot blank	N/A	BRL	N/A
6-21-8	6-21-2023	N/A – 1 aliquot blank	N/A	BRL	N/A
6-26-1	6-26-2023	Archery – floor on south end of range	1	2.7	<10
6-26-2	6-26-2023	Archery – floor in center of range	1	2.0	<10
6-26-3	6-26-2023	Archery – floor on north end of range	1	1.2	<10
6-26-4	6-26-2023	Archery – floor on west end of range by entrance to range	1	7.2	<10
6-26-5	6-26-2023	N/A – 1 aliquot blank	N/A	BRL	N/A
6-26-6	6-26-2023	N/A – 1 aliquot blank	N/A	BRL	N/A
7-6-ML-1	7-6-2023	Member’s Lounge – floor by north wall	1	2.9	<10
7-6-ML-2	7-6-2023	Member’s Lounge – floor in women’s restroom	1	2.6	<10
7-6-HG-1	7-6-2023	Handgun range – floor in NE corner	1	68	<10
7-6-HG-2	7-6-2023	Handgun range – floor in middle by west wall	1	57	<10

Sample Number	Sample Date	Sample Location	Sample Area (ft ²)	Sample Results (ug/ft ²)	Recommended cleanup standard (ug/ft ²)
7-6-HG-3	7-6-2023	Handgun range – floor in SE corner	1	98	<10
7-6-HG-4	7-6-2023	Handgun range – center of floor in room south of handgun range	1	130	<10
7-6-T-1	7-6-2023	Tactical range – floor in north ½ in SW corner	1	3.0	<10
7-6-T-2	7-6-2023	Tactical range – floor in north ½ in NE corner	1	4.3	<10
7-6-T-3	7-6-2023	Tactical range – floor in men’s restroom	1	1.7	<10
7-6-E1	7-6-2023	Exterior sidewalk – north side of building west of northeast entrance	1 ft ²	160	<800
7-6-B1	7-6-2023	N/A – 1 aliquot blank	N/A	BRL	N/A
7-6-B2	7-6-2023	N/A – 1 aliquot blank	N/A	BRL	N/A
7-14-HG-1	7-14-2023	Handgun range – floor on north half in center of floor	1	13	<10
7-14-HG-2	7-14-2023	Handgun range – floor in middle of range	1	110	<10
7-14-HG-3	7-14-2023	Handgun range – floor in south ½ of range by west wall	1	60	<10
7-14-HG-4	7-14-2023	Handgun range – floor in room south of range	1	230	<10
7-14-X1	7-14-2023	N/A – 1 aliquot blank	N/A	BRL	N/A
7-14-X2	7-14-2023	N/A – 1 aliquot blank	N/A	BRL	N/A
7-24-1	7-24-2023	Handgun range- floor on south end of range	1	3.2	<10
7-24-2	7-24-2023	Handgun range- floor in south center of range	1	1.8	<10
7-24-3	7-24-2023	Handgun range- floor in north-center of range	1	1.1	<10
7-24-4	7-24-2023	Handgun range- floor on north end of range	1	2.5	<10
7-24-5	7-24-2023	Rifle range – floor on south end of rifle range	1	2.8	<10
7-24-6	7-24-2023	Rifle range – floor at south center portion of range	1	0.61	<10
7-24-7	7-24-2023	Rifle range – floor at north center portion of range	1	0.56	<10
7-24-8	7-24-2023	Rifle range – floor in north center portion of range	1	1.0	<10
7-24-9	7-24-2023	Detached garage – floor in NE portion	1	<0.50	<10
7-24-10	7-24-2023	Detached garage – floor in center	1	<0.50	<10
7-24-11	7-24-2023	Detached garage – floor in south center portion of garage	1	<0.50	<10
7-24-12	7-24-2023	Detached garage – floor on south end	1	<0.50	<10

Sample Number	Sample Date	Sample Location	Sample Area (ft ²)	Sample Results (ug/ft ²)	Recommended cleanup standard (ug/ft ²)
7-24-13	7-24-2023	Exterior concrete where cyclones from HVAC system for ranges used to be	1	130	<800
7-24-14	7-24-2023	N/A – 1 aliquot blank	N/A	BRL	N/A
7-24-15	7-24-2023	N/A – 1 aliquot blank	N/A	BRL	N/A

*sample held for analysis

Sample Results Key

ug = microgram
 ug/cm² = microgram/square centimeter
 ug/ft² = microgram/square foot
 BRL = below reporting limit

Soil Sampling

Soil samples were collected in accordance with laboratory recommended procedures. As the subject property was a former commercial building, there were no designated “play areas” as defined by Colorado Regulation 19 and as of the date of this report, VERTEX is unaware if anywhere on the subject property will be designated a “play area.” Nonetheless, VERTEX recommends that all soil areas surrounding the subject property be subject to the most stringent of regulatory standards pertaining to lead-in-soil concentrations.

Sample Number	Sample Date	Sample Location	Sample Area	Sample Results (mg/kg)	Recommended post-decontamination level (mg/kg)
7-6-S1	7-6-23	South portion of building with grass – multiple locations along south side of building	6 aliquot composite	39	<400
7-6-S2	7-6-23	North portion of building – multiple locations in gravel parking lot area north of building	5 aliquot composite	23	<400

Sample Results Key

ug/g = microgram/gram (parts per million)
 mg/kg = milligram/kilogram (parts per million)

5.0 LABORATORY ANALYSIS

Sample analysis for lead-in-dust was conducted by SGS Galson Laboratories (SGS) and Eurofins Reservoirs Environmental, Inc. in accordance with industry standards and laboratory recommended procedures.

Sample analysis for lead-in-soil was conducted by SGS in accordance with industry standards and laboratory recommended procedures. All sample media was supplied by SGS.

6.0 DISCUSSION

The intent of the project was to remove the lead-in-dust contamination from throughout the facility in accordance with the HUD and CDPHE Regulation 19 lead clearance standards. As it is not feasible to sample all areas of all surfaces, the wipe sampling strategy utilized by VERTEX does not provide for nor ensure that all surfaces within a subject property undergo wipe sampling; thus, the possibility exists that lead-in-dust concentrations on surface locations not sampled during an assessment may be in excess of HUD and/or CDPHE Regulation 19 cleanup standards.

A visual inspection and limited wipe sampling was performed within a containment area until representative samples within that area demonstrated compliance with HUD cleanup standards. The exterior wipe samples and exterior soil samples were all below recognized exterior lead-in-dust surface standards and lead-in-soil standards. Thus, VERTEX has no further recommendations for the subject property. Please contact us at (303) 623-9116 should you have any questions regarding this matter. Thank you for choosing VERTEX.

Sincerely,
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