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SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF CONTRA COSTA
By _____ Deputy Clerk
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SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF CONTRA COSTA

EXIDE TECHNOLOGIES, Petitioner, v. CALIFORNIA DEPARTMENT OF PUBLIC HEALTH, Respondent.	Case No. N16-0737- **VERIFIED PETITION FOR WRIT OF MANDATE PURSUANT TO THE CALIFORNIA CONSTITUTION AND THE CALIFORNIA PUBLIC RECORDS ACT** Date: Time: Dept.: 9

Petitioner Exide Technologies ("Exide" or "Petitioner") petitions this Court for a writ of mandate directed to Respondent California Department of Public Health ("CDPH" or "Respondent") commanding Respondent to comply with the California Public Records Act, Government Code section 6254 *et seq*. ("CPRA"), and Article I section 3(b) of the California Constitution by promptly making available records concerning the conduct of the people's business.

Petitioner avers as follows:

PARTIES

1. Exide is a corporation organized under the laws of the State of Delaware and doing business in the State of California. Exide manufactures automotive and industrial batteries and is the owner of a battery recycling facility located in Vernon, California (the "Vernon Facility").

Under Government Code section 6258 and Article I, section 3(b) of the California Constitution, Exide is entitled to pursue its right of access to the records sought herein by petitioning this Court for a writ of mandate to compel CDPH to make those records public.

2. Pursuant to California law, Respondent CDPH collects, analyzes and distributes to the public and others information regarding blood lead level testing conducted in California. Respondent CDPH is a state agency as defined by Government Code section 6252(f)(1). As such, CDPH has a mandatory duty to comply with all provisions of the CPRA, Government Code section 6250 *et seq*. ("CPRA").

JURISDICTION AND VENUE

3. The Court has jurisdiction of this matter under Article I, section 3 of the California Constitution, the CPRA, and Code of Civil Procedure section 1085. Venue is proper in this Court under Government Code section 6259(a) and Code of Civil Procedure section 393 because, upon information and belief, all or part of the records sought herein are in the possession of the Childhood Lead Poisoning Prevention Branch ("CLPPB"), a subdivision of CDPH, and CLPPB's offices are located in the City of Richmond, County of Contra Costa.

FACTS

Exide Seeks Public Records in Order To Analyze and Address Alleged Lead Exposure of Children and Adults in the Vicinity of the Vernon Facility and Los Angeles County

4. The Vernon Facility has been the site of smelting, battery recycling and related activities since 1922. Exide acquired the facility in 2000 and operated it until giving formal notice of its intent to close the facility pursuant to an agreement with federal authorities reached in March 2015.

5. Pursuant to agreements with state regulators, Exide is funding a $38.6 million fund for the Vernon Facility closure, and has committed $14 million to address lead in residential soils in the vicinity of the Vernon Facility. Exide has also agreed to make regular further payments into the cleanup fund, and has agreed to pay for blood lead level testing of individuals living near the Vernon Facility.

6. Many public statements by regulators (and hence media reports) have alleged that the Vernon Facility is the primary source of lead contamination in the area around the Vernon Facility, which purportedly has also affected blood lead levels in nearby residents. For example, State regulators recently released a plan entitled "The Plan to Expedite and Expand Testing and Cleanup of Properties Contaminated by Exide." Recent media coverage reporting on the State's release of a limited blood lead study contained similar assumptions, such as "Higher lead levels found in children near Exide plant in Vernon." However, Exide is informed and believes that these public statements and reports are based on incomplete scientific and testing information.

7. Upon information and belief, blood lead level testing data and other information and analysis indicate that any contribution by Exide to the presence of lead in the residential areas around the Vernon Facility is significantly more limited than the regulators' statements and media reports suggest. For instance, a sophisticated and extensive statistical analysis prepared by two Carnegie Mellon University professors analyzed soil lead concentrations in areas around the Vernon Facility and estimated the relative contributions from historic lead emissions from the facility, along with background levels from non-Exide sources such as leaded gasoline and lead-based paint. These other lead sources constitute what is known as the "urban background levels" of lead. That study concluded that the area of impact from the Vernon Facility above urban background levels is confined to the industrial area that surrounds the facility and does not reach adjacent residential areas.

8. Further, a report released by CDPH on April 8, 2016 concluded that the age of housing stock was an "important predictor" of high blood lead levels in children living near the Vernon Facility because lead was used in house paint until 1978, when it was effectively banned. Upon information and belief, because older houses generally have higher concentrations of lead in paint than houses built after 1978, this report from CDPH suggests that exposure to lead paint in the aged housing stock near the Vernon Facility is a far more significant cause of elevated blood lead levels than exposure to lead in emissions from the Vernon Facility.

9. This conclusion was supported by the California Department of Toxic Substances Control ("DTSC") in a press release issued on April 8, 2016. There, DTSC explained that a sub-

study released by CDPH that included detailed data on the age of individual homes "found a large increased likelihood of higher blood lead among children living in a home built before 1925. In this analysis, the effect of distance from Exide was not seen, after controlling for the age of housing." Thus, in that study, proximity to the Vernon Facility had no cognizable effect on blood lead levels, but exposure to older houses in the area with leaded paint had a significant effect.

10. Pursuant to requirements imposed by California law, results of testing of blood lead levels in children and adults throughout the state of California are provided to CDPH. As a result, CDPH possesses extensive and detailed records regarding blood lead level tests of individuals living near the Vernon Facility and elsewhere.

11. Upon information and belief, if properly performed, blood lead level testing is among the most accurate and reliable means of identifying whether an individual is being exposed to lead from an environmental source.

12. In order to identify and analyze potentially elevated blood lead levels of nearby residents, to assess factors that may be contributing to elevated blood lead levels, and to identify and address any potential public health concerns, Exide on November 24, 2015 requested records from CDPH regarding blood lead level testing conducted on individuals living in Los Angeles County.

13. Upon information and belief, many others have sought and continue to seek data similar to that sought by Exide, including state and local authorities, activist groups, and the media. Indeed, DTSC has indicated that it has been attempting to obtain CDPH's blood level testing data for more than two years, apparently to no avail.

14. As set forth in detail below, CDPH has rebuffed these efforts, producing only limited records from its extensive databases. The CDPH databases contain all of the records sought by Exide.

15. Exide and the public are entitled to these records under the California Constitution and Public Records Act because they are writings that contain information "concerning the conduct of the people's business." (Cal. Const., Art. I, sec. 3(b)(1); Gov. Code § 6252(e).)

16. The public interest in the release of these records could scarcely be higher. The records sought could help identify and address the public health concerns relating to lead in the area of the Vernon Facility and potentially throughout Los Angeles County.

Exide's November 24, 2015 Request Under the CPRA and Article I, Section 3(b) of the California Constitution

17. On November 24, 2015, pursuant to the CPRA and Article I, section 3(b) of the California Constitution, Exide requested certain data received or generated by CDPH pursuant to the California State Childhood Lead Poisoning Prevention Acts and Health & Safety Code section 124310 with respect to individuals in Los Angeles County from January 1, 2007 to present (the "November 24 Request").[1] A true and correct copy of the November 24 Request is attached hereto an **Exhibit A** and is incorporated herein by reference.

18. Specifically, Exide requested, with respect to each individual in Los Angeles County whose blood lead level was tested after 2007:

- Any unique identification numbers or codes assigned to subjects of testing, including any unique identifier(s) that are or can be used to determine if a subject was tested more than once within a year, but not including any potentially public identification numbers or codes utilized for purposes, such as Social Security Number or Driver's License Number;
- Blood lead level (ug/dL);
- Blood lead level detection limit;
- Date that blood lead was sampled;
- Age of person tested;
- City in which the individual tested resides;
- Zip code in which the individual tested resides;
- Collection method (capillary, venous, etc.); and

[1] Pursuant to the California State Childhood Lead Poisoning Prevention Acts of 1986 and 1991 (California Health and Safety Code sections 124125 and 105275, respectively), and California Health & Safety Code section 124310, CDPH is required to designate laboratories qualified to perform tests on the levels of lead present in the bloodstream of children and adults, and to regulate those laboratories to ensure they meet federal and state standards. Pursuant to the same authorities, the results of all such blood lead level test results in the State of California are required under law to be electronically reported to CDPH, and are received, maintained, and analyzed by CLPPB.

- Whether the blood lead concentration triggered an investigation, and the conclusion of that investigation (including, any conclusion or data as to the source of the lead).

19. In addition, Exide requested records regarding the age of the homes in which the persons tested resided.

20. Exide further requested that CDPH provide the following three specific tables, which Exide understood to be in the possession of CDPH at the time of the November 24 Request:

- A table listing the 20 Los Angeles County Zip codes with the highest number of children under 6 years old with blood lead levels greater than 4.5 ug/dL for the year 2012;
- A table listing blood lead levels for Los Angeles County by Zip code and age group for the year 2012; and
- A table listing by Zip code the number of people under 21 years old with blood lead levels greater than 9.5 micrograms per deciliter for the years 2009-2012 in Los Angeles County.

21. In the November 24 Request, Exide emphasized that the information provided by CDPH should be de-identified, *i.e.*, that individual patient names, addresses, telephone numbers, and any other potentially public identifiers such as Social Security Numbers or family-member names, should be redacted.

22. CDPH responded to the November 24 Request in a letter dated December 7, 2015, two days later than required under Government Code section 6253(c) (the "December 7 Letter"). A true and correct copy of the December 7 Letter is attached hereto as **Exhibit B** and is incorporated herein by reference. The December 7 Letter asserted that the agency needed additional time to respond to Exide's request. Thus, CDPH purported to invoke the 14-day extension for California agencies to respond to CPRA requests pursuant to Government Code section 6253(c).

CDPH's Insufficient Response to Exide's November 24 Request

23. By letter dated December 21, 2016, CDPH asserted that, as to all of the information requested by Exide, CDPH does not have "existing records" containing the information requested (the "December 21 Letter"). A true and correct copy of CDPH's December 21, 2015 letter is attached hereto as **Exhibit C** and is incorporated herein by reference.

24. CDPH's assertion that it does not have existing records containing the information sought by Exide notwithstanding, the December 21 Letter stated as follows:

- A database in the possession and/or control of CDPH named Response and Surveillance System for Childhood Lead Exposure 2 ("RASSCLE 2") contains blood-level testing data "reported to CDPH beginning in the 1990s;"
- "Virtually all" blood-level testing data since 2007 has been received by CDPH in electronic format, and that all such information is contained in RASSCLE 2;
- CDPH has previously performed "data extracts" of statewide data, *i.e.*, that it has extracted data from available databases for particular purposes, between 1992 and 2011;
- That blood-level testing data for individuals aged 16 and older is contained in a database called Elevated Lead Visual Information System (ELVIS II);
- That ELVIS II contains data for individuals aged 16 and older dating back to 2007 and indeed earlier;
- That there is some duplication of the data contained in RASSCLE 2 and ELVIS II, but that RASSCLE 2 contains data pertaining to blood-level testing of individuals of all ages, *i.e.*, both older and younger than 16 years old, dating back to 2009; and
- Using the information contained in RASSCLE 2, CDPH prepares and produces bi-weekly reports, transmitted to "individual local jurisdictions."

25. CDPH further acknowledged in the December 21 Letter that the data contained in RASSCLE 1, RASSCLE 2 and ELVIS II is routinely extracted by CDPH for bi-weekly and other reports to local government entities.

26. Based on the facts set forth above, including CDPH's representations in the December 21 Letter and other communications, Exide is informed and believes, and thereupon alleges, that the records requested in the November 24 Request are in the possession of CDPH, and in particular in the possession of CLPPB.

27. Based on the facts set forth above, including CDPH's representations in the December 21 Letter and other communications, Exide is informed and believes, and thereupon alleges, that CDPH routinely assembles and produces reports from these databases in the manner in which Exide has requested the records to be provided.

28. To date, although CDPH has sporadically provided certain records, it has refused to provide most of the records sought by the November 24 Request. In particular, as further discussed below, it has refused to provide the records described in Paragraph 16 above, and has

asserted that Exide's request for those records "is not a PRA [Public Records Act] request." However, CDPH has not asserted or shown that any specified exemption to disclosure applies to those records.

29. CDPH's failure to provide the records sought by the November 24 Request is a violation of the CPRA and the California Constitution.

Although it Promised to "Work With" Exide to Provide the Records Sought, CDPH in Fact Has Refused to Provide the Records and Has Refused to Respond to Exide's Request

30. CDPH represented in the December 21 Letter that it was "willing to work" with Exide to "narrow the requested data into something that could be extracted from the database in a way that our epidemiologists determine is not identifiable."

31. Following up on the representation by CDPH that the agency was "willing to work with" Exide, on January 15, 2016, counsel for Exide called Richard Votava, at that time the Chief of the Operational Support Section of the CLPPB and the CDPH official who signed the December 7 and December 21 Letters. Counsel for Exide asked a for a telephone conference including representatives of CDPH and Exide, in order to work with CDPH to obtain the requested records.

32. Mr. Votava said that CDPH would consider the request for a telephone conference.

33. Hearing nothing from Mr. Votava, on January 19, 2016 and again on January 23, 2016, counsel for Exide contacted Mr. Votava to follow up on the request for a telephone conference. On January 25, 2016, Mr. Votava emailed counsel for Exide, indicating that he (Mr. Votava) was coordinating a telephone conference to address the records requested by Exide.

34. Three weeks later, on February 16, 2016, Votava left a voice mail for counsel for Exide, proposing a telephone conference the next day.

The February 17 Telephone Conference

35. On February 17, 2016, counsel for Exide and several representatives from CDPH participated in a telephone conference (the "February 17 Telephone Conference").

36. During the February 17 Telephone Conference, CDPH personnel represented the following as to the categories of records requested by Exide:

(a) Individual Blood Lead Level: Available.

(b) Detection Limit: Available. However, CDPH does not include information specifically defining the detection limit of the blood-level test administered. Instead, CDPH records indicate whether the blood-lead level was above a pre-determined threshold.

(c) Date Blood Sampled and/or Tested: Available "in the high 90% of cases," and in "99 percent of cases" CDPH has either the date blood was drawn, or the date it was tested.

(d) Age of the Person Tested: Available. Although Exide originally requested the age of individuals tested in "bands" (*i.e.*, clustered into age ranges) because that is how Exide believed that CDPH collected the information, CDPH indicated it collected such information by date of birth and age of the individual tested.

(e) City: Available.

(f) Zip Code: Available.

(g) Age of Building: Available as individual whose tests showed a blood-lead level high enough to prompt further investigation.

(h) Whether an Investigation Was Triggered: Available.

(i) Conclusion as to source of lead: Available, provided that an investigation was triggered, and provided that the investigation information is entered into CDPH databases.

37. The February 17 Telephone Conference clarified the information contained in the records received and maintained by CDPH. Based on the February 17 Telephone Conference and other communications with CDPH, Exide is informed and believes that CDPH has in its possession, custody or control the following records (the "Core Information Sought"):

Year	Individ. blood level	Detection or reporting limit	Date blood drawn or tested	Age of individ. tested	City in which individ. resides	Zip code in which individ. resides	Age of building where individ. resides	Collection method	Invest-igation triggered?	Source of lead
Yes-at least 2009 to 2014	Yes	Yes	Yes—99% of records	Yes—CDPH has age when blood drawn	Yes	Yes	Yes—available in age "bands," if invest-igation triggered	Yes	Yes	Yes—if invest-igation trigger and data included

38. During the February 17 Telephone Conference, CDPH disclosed that it had or was creating a de-identified report of the results of blood lead level testing conducted within a defined area around Exide's Vernon Facility.

39. During the February 17 Telephone Conference, CDPH indicated a willingness to provide the records requested by Exide, although it raised concerns regarding the manner in which the records would be de-identified. CDPH and Exide discussed using a commonly applied approach to de-identification called "k-anonymity." Under this approach, data regarding individual subjects is redacted or suppressed in such a manner that no less than a pre-determined number of individuals (the "k" factor) in the records share a particular set of publicly-knowable characteristics.

40. Upon information and belief, CDPH is well-versed in applying k-anonymization and/or other de-identifying techniques, as evidenced by the fact that it has produced numerous de-identified datasets, including subsets of the records requested by Exide. For example, on April 8, 2016, CDPH made public a report regarding blood lead level testing results from 2012 for children under the age of six living in the area around the Vernon Facility, by census tract (the "CDPH Exide Analysis Area Report"). The information in this report was de-identified. A true and correct copy of the CDPH Exide Analysis Area Report is attached as **Exhibit D**. In addition, as discussed below, Los Angeles County has released other de-identified records prepared by or in cooperation with CDPH.

41. Indeed, CDPH itself publicly proclaims that it "provides data to local CLPPB Programs and the public," and it makes de-identified information regarding blood lead level testing results available to the public through its website.[2]

42. To date, CDPH has refused to provide the requested records. In particular, it has refused to provide the Core Information Sought. However, CDPH has not asserted or shown that any specified exemption to disclosure applies to those records.

43. CDPH's refusal to provide the records sought is a violation of the CPRA and the California Constitution.

Exide's February 29, 2016 Letter and Further CPRA Request

44. On February 29, 2016, counsel for Exide sent a letter to Mr. Votava at CDPH, providing clarifications requested by CDPH during the February 17 Telephone Conference as to the records requested by Exide (the "February 29 Letter"). A true and correct copy of the February 29 Letter is attached hereto as **Exhibit E** and is incorporated herein by reference.

45. The February 29 Letter slightly revised the descriptions of the Core Information Sought, so that the descriptions would match the information CDPH had confirmed that it receives and maintains. In addition, the February 29 Letter asked that CDPH clarify the information included in, and the time period covered by, the existing records. The letter also emphasized that Exide wished to "minimize the burden of providing the requested information," and requested CDPH's assistance in doing so by providing further information about the extent and nature of the data in the possession of CDPH. The February 29 Letter further stated that Exide is "willing to discuss modifications to the records we seek if most of the requested information can be expeditiously provided through the disclosure of existing records."

46. The February 29 Letter stated that Exide is "willing to consider paying for the reasonable costs of providing the requested information," provided that CDPH provide "an estimate of the costs for doing so, including information as to the amount of time required and how the attendant costs are calculated."

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[2] See http://cehtp.org/page/lead/query, last accessed April 14, 2016.

47. In the February 29 Letter, Exide proposed that, as discussed in the February 17 Telephone Conference, k-anonymization be applied to the records provided in response to Exide's request. Exide specifically proposed in the February 29 Letter that a "K" of 10 be employed, *i.e.*, that no fewer than 10 individuals in the dataset can share a particular set of characteristics.

48. A k-anonymization standard of 10 is consistent with standards often employed in the release of health related information, for example in the release of prescription information by the Centers for Medicare and Medicaid Services.[3]

49. Finally, the February 29 Letter made two additional requests for records under the CPRA and the California Constitution. First, Exide requested that CDPH provide, in de-identified form, all results of blood-lead level testing conducted pursuant to certain blood lead testing and monitoring programs funded by Exide. Second, Exide requested that CDPH provide any records received or created by CDPH relating to blood lead level testing conducted within a defined area around Exide's facility in Vernon, California.

50. CDPH failed to respond to the CPRA request contained in the February 29 Letter within the time limits required under the CPRA, Gov. Code section 6253(c).

51. CDPH's failure to respond within the time required is a violation of the CPRA and the California Constitution.

Further Delay by CDPH

52. Exide waited for more than a week to receive any response from CDPH regarding the February 29 Letter. Receiving no response, on March 7, 2016 Exide's counsel called Mr. Votava and discovered that he was no longer employed at CLPPB. The same day, counsel for Exide called Valerie Charlton, Chief, Child Lead Poisoning Prevention Branch, who also participated in the February 17 Telephone Conference. Ms. Charlton said that CDPH "hopefully" would respond to the February 29 Letter by the week of March 14, 2016. Counsel for Exide then called Melanie Neumeyer, a staff attorney at CDPH who participated in the February 17

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[3] See https://questions.cms.gov/faq.php?id=5005&faqId=9846, last accessed April 13, 2016.

Telephone Conference. Ms. Neumeyer did not answer her phone. Counsel for Exide left Ms. Neumeyer a voice mail, asking her to call back.

53. The same day, counsel for Exide also sent an email to Ms. Neumeyer noting that "based on the telephone conference on February 17, I understand that [CDPH] has agreed to provide the request[ed] records in de-identified form" (the "March 7 Email"). Counsel for Exide further stated, "[i]t is my understanding that all that is required at this point is an estimate of the costs of providing the records and then, if there is agreement on that point, we can proceed with the delivery of the requested records." A true and correct copy of the March 7 Email is attached hereto as **Exhibit F** and is incorporated herein by reference.

54. Counsel for Exide followed up with Ms. Neumeyer by email the following day, March 8, stating in full: "Dear Ms. Neumeyer, If you intend to get back to me, please let me know when you will. If you do not intend to respond, please let me know and I will stop following up and proceed accordingly." A true and correct copy of the March 8 email is attached hereto as **Exhibit G** and is incorporated herein by reference. The following day, March 9, Ms. Neumeyer responded. Her response stated in full: "Yes, full response is forthcoming. Thanks[.]" A true and correct copy of the March 8 email is attached hereto as **Exhibit H** and is incorporated herein by reference.

55. Six days passed with no communication from CDPH. On March 15, 2016, counsel for Exide called Ms. Charlton, who refused to answer any questions and referred Exide's counsel to Ms. Neumeyer. Counsel for Exide called Ms. Neumeyer and left another voice mail. Two weeks passed with no further communication from CDPH.

CDPH Contends For the First Time That Exide's November 24 Request is "Not a PRA Request"

56. On March 30, 2016, nearly five months after Exide's initial request for records, Ms. Neumeyer emailed counsel for CDPH (the "March 30 Email"). A true and correct copy of the March 30 Email is attached hereto as **Exhibit I** and is incorporated herein by reference.

57. The March 30 Email reiterated CDPH's contention in the December 21, 2015 Letter that the November 24 Request asked for records that are "not contained in an existing

document." CDPH's contention that the records sought are "not contained in an existing document" is untrue. Based on the communications between Exide and CDPH, it appears that CDPH contends that a database is not a "document" or a "record" for purposes of the CPRA or the California Constitution. That contention is incorrect as a matter of law. (Gov. Code section 6253.9 ["any agency that has information that constitutes an identifiable public record …that is an electronic format shall make that information available in an electronic format when requested by any person"].) Based on the incorrect premise that Exide's November 24 Request sought records "not contained in an existing document," the March 30 Email asserted that Exide's November 24 Request "is not for an existing record" and thus "is not a PRA request."

58. The March 30 Email further incorrectly characterized the November 24 Request as asking CDPH to create "a custom document by doing a custom data extraction," and asserted that CDPH has "no legal obligation to create this record" and that CDPH "is not required to create a new record." This was the first time in more than five months that CDPH had asserted that complying with the November 24 Request would entail the "creat[ion] of a new record." The March 30 Email did not identify any specific exemption from disclosure under the CPRA.

Exide's April 1 Email

59. On April 1, 2016, counsel for Exide emailed Ms. Neumeyer at CDPH in response to her March 30 email (the "April 1 Request"). Counsel for Exide clarified that Exide understood the March 30 Email to indicate that CDPH "takes the position that it has no obligation to respond to our request." A true and correct copy of the April 1 Request is attached hereto as **Exhibit J** and is incorporated herein by reference.

60. Counsel for Exide further explained that "nearly all of the records we have requested are contained in a single database: the RASSCLE II database." And, "[t]o the extent the records we have requested are not contained in RASSCLE II, they are contained in the RASSCLE I and/or ELVIS II databases."

61. The April 1 Request further explained that "de-identifying" the data requested does not require the creation of a "new record," as the CPRA requires that any "reasonably segregable

portion of a record shall be available for inspection by any person requesting the record after deletion of the portions that are exempted by law." (Gov. Code section 6253(a).)

62. Thus, the April 1 Request explained, "CDPH has a clear legal duty to provide the information we have requested after redaction of identifying information," and "[d]oing so does not in any way entail the creation of a new record, and the need to segregate and provide disclosable information is not in any way a barrier to our requests."

63. Finally, the April 1 Request requested that CDPH provide "all de-identified collections of records or datasets that CDPH has provided to any member of the public, and all correspondence or other documents describing such collections or datasets."

CDPH's April 8 Email

64. On April 8, 2016, Ms. Neumeyer of CDPH sent an email to counsel for Exide, attaching data that Ms. Neumeyer represented was responsive to Exide's request in its February 29 Letter for limited records regarding blood lead level testing surrounding the Vernon Facility (the "April 8 Email "). A true and correct copy of the April 8 Email is attached hereto as **Exhibit K** and is incorporated herein by reference.

65. The April 8 Email further stated: "This document [i.e., the attached data] concludes the records [CDPH] has for your initial PRA request," *i.e*., the November 24 Request. The document attached to the April 8 Email did not contain the information sought in the November 24 Request, specifically the Core Information Sought. Thus, the April 8 Email appears to be a denial of Exide's original, November 24 Request. To the extent the April 8 Email constituted a formal rejection of Exide's November 24 Request, that rejection did not come until nearly five months after the request was made, and this delay is itself a violation of the CPRA and the California Constitution. (See, e.g., Gov. Code section 6253(d) ["Nothing in this chapter shall be construed to permit an agency to delay or obstruct the inspection or copying of public records"].) Furthermore, this delay constituted a constructive rejection of Exide's request for records to which it is entitled under the CPRA and the California Constitution and thus was a violation of both.

66. Moreover, the April 8 Email is equivocal and ambiguous. CDPH's ambiguous response to Exide's request for records violated the CPRA and the California Constitution because it resulted in the denial of access to non-exempt public records CDPH is obligated to produce under the CPRA and the California Constitution.

Corroboration that the Records Exide Seeks Are in the Possession of CDPH, and that Compliance with Exide's Request Does Not Require the Creation of a "New Record"

67. Additional documents confirm that, contrary to CDPH's representation that it has no existing document containing the information sought by Exide, all of the records Exide has requested are in the agency's possession. In particular, this is confirmed by (a) sworn testimony in a declaration dated February 11, 2013, by Joe Courtney, Senior Epidemiologist at CLPPB (the "Courtney Declaration"), and (b) a data set produced by Los Angeles County Department of Public Health containing blood lead level testing data, obtained from CDPH, for the period 2010-2014.

68. On February 11, 2013, Mr. Courtney submitted a sworn declaration to the Santa Clara County Superior Court in the matter of *County of Santa Clara v. Atlantic Richfield Co.*, Case No. 1-00-CV-788657. A true and correct copy of the Courtney Declaration is attached hereto as **Exhibit L** and is incorporated herein by reference.

69. In his declaration, Mr. Courtney testified that "[l]aboratories in California are required to report every blood lead test to [CDPH]." He testified that all of this information "is automatically channeled into [CDPH's] RASSCLE II database."

70. Mr. Courtney further testified that "[i]f a child's blood lead level reaches a certain threshold, a[n entity contracting with CDPH] launches an investigation, which is recorded on a Lead Poisoning Follow-Up Form," and he testified that some of the information from that form is entered into the RASSCLE 2 database, and that entities contracting with CDPH are required to keep copies of all completed Lead Poisoning Follow-Up Forms.

71. Mr. Courtney further testified that CDPH has previously created four subsidiary datasets that contain most or all of the Core Information Sought. Those four datasets are as follows:

(a) Dataset A: Contains the results of "all blood level tests entered into the RASSCLE II database," spanning a period from January 1, 1992 to April 4, 2012. Included in the information submitted are the "address, gender, race, and year of birth of the individual receiving the blood lead test." Also included is information regarding the age of housing in which the individual tested resided. Notably, the information in "Dataset A" includes "a unique Patient ID and an Address ID" for every individual whose information appears in Dataset A.

(b) Dataset B: Contains environmental lead-exposure information from January 1, 2006 to April 4, 2012. Specifically, Dataset B contains "information on blood lead tests, characteristics of the residence of the individual tested, and environmental sampling results." Importantly, the information contained in Dataset B "can be easily linked to Dataset A through both Patient ID and Address ID."

(c) Dataset C: Was "previously produced" pursuant to a lawsuit filed in Sacramento County Superior Court, *Equilon Enterprises v. State Bd. of Equalization*, Case No. 05AS02406. This dataset contains "comprehensive information on (1) lead-exposed children and their families, (2) environmental and non-environmental exposures to lead, and (3) health information for individuals from January 1, 1992 to March 28, 2006." Specifically, Dataset C contains information regarding the "year of birth" of the individual tested, along with "gender, race and ethnicity, blood lead levels and sample types, the year the tests were conducted," and detailed blood lead level test results. As with Dataset B, Dataset C "can easily be linked to Dataset A through Patient ID."

(d) Dataset D: Contains information on the tested individual's "year of birth, gender, race/ethnicity…blood lead level, information on lead-related health conditions…sampling results on potential lead hazards," and extensive information relating to numerous other copies. As with Datasets B and C, Dataset D "can be easily linked to Dataset A," through both Patient ID and Address ID.

72. Mr. Courtney's testimony confirms that CDPH has in its possession all or most of the records sought by Exide, and in particular the Core Information Sought at least up through 2012. Mr. Courtney's testimony establishes not only that CDPH has previously prepared specific

datasets (A-D) containing most or all of the information sought by Exide, but that Datasets A-D can "easily" be linked to one another by way of unique Patient and Address ID numbers. In other words, it is possible and indeed "easy," according to Mr. Courtney's sworn testimony, to cross-reference the various datasets within RASSCLE 2 by means of unique identifiers, and doing so does not involve creating a "new record."

73. On or about April 11, 2016, pursuant to a separate CPRA request by Exide directed to the Los Angeles County Department of Public Health ("LACDPH") LACDPH provided records showing blood lead level testing data in Los Angeles County between the years 2010 and 2014 ("LAC Dataset"). A true and correct copy of the LAC Dataset is attached hereto as **Exhibit M** and is incorporated herein by reference.

74. The LAC Dataset states that the source of the data it contains is "data CD's" created by CDPH/CLPPB. In other words, the LAC Dataset was created with information in the possession of CDPH. It also states that it was prepared by Los Angeles County, CDHP, and CLPPB. Finally, it states that it was prepared in September 2015, two months prior to Exide's initial November 24 Request.

75. The LAC Dataset contains part, though not all, of the information requested in the November 24 Request. While it is organized by census tract rather than Zip code, it is nonetheless responsive to Exide's original request. At no time prior to LACDPH providing the LAC Dataset did CDPH ever mention or acknowledge its existence.

76. The LAC Dataset further demonstrates that the records sought by Exide are in the possession of CDPH and, moreover, that they can be easily redacted to ensure that individuals cannot be identified, either directly or indirectly, if and when the records are provided.

The April 15 Call, CDPH's April 22 Email, and Exide's April 23 Email

77. On April 15, 2016, counsel for Exide and Ms. Neumeyer spoke by telephone (the "April 15 Call"). Counsel for Exide pointed out that the LAC Dataset itself indicates that it was created by or with the assistance of CDPH and CLPPB, contains individual-level blood lead testing results for Los Angeles County between 2010 and 2014, is responsive to Exide's original November 24 Request, and was created in September 2015, prior Exide's November 24 Request.

Counsel for Exide proposed that, as a compromise, CDPH agree to provide this existing record, in de-identified form, and that if CDPH was willing to do so Exide might agree not to pursue litigation seeking the full set of records originally requested.

78. On April 22, 2016, Ms. Neumeyer sent an email to counsel for Exide (the "April 22 Email"). A true and correct copy of the April 22 Email is attached hereto as **Exhibit N** and is incorporated herein by reference. In the April 22 Email, CDPH denied that it had the LAC Dataset. CDPH offered to provide "data compiled for the data discs that were provided to LA [C]ounty, for the years 2007 through 2015 which can be located, with information considered confidential or which allows identification of an individual redacted." CDHP asserted that the records it offered to produce contain "most of the information" that Exide originally requested nearly five months earlier. Thus, CDPH acknowledged that it was still refusing to provide key components of the records sought since the November 24 Request, including information relating to: (a) whether the individual's blood lead level triggered and investigation; (b) the age of the building where the tested individual resided at the time of testing; and (c) the source of lead.

79. Notably, in the April 22 Email, CDPH also qualified its offer by saying that it would provide only records "which can be located." In addition, CDIP re-iterated the incorrect and unsupported assertion that collecting the records requested by Exide would require the "creation of a new data analysis/record."

80. On April 23, 2016, counsel for Exide sent an email to Ms. Neumeyer (the "April 23 Email"). A true and correct copy of the April 23 Email is attached hereto as **Exhibit O** and is incorporated herein by reference. In the April 23 Email, counsel for Exide noted that "the records you have indicated you would be willing to provide do not include some of the records we have requested." Exide also noted that CDHP "continue[s] to take the position that Exide's requests entail 'the creation of a new data analysis/record," and that "[t]here is no reason to make this assertion except to indicate that it is your position that Exide is not legally entitled to the records it has requested." Accordingly, Exide explained, "we understand that you are denying Exide's requests, and we will proceed accordingly."

81. Finally, counsel for Exide noted in the April 23 Email that the records CDPH offered to produce in the April 22 Email "have existed since long before our original request in November of last year," but that "CDPH refused to provide them for almost five months, and still refuses to provide many of the records [Exide has] requested. This is a constructive denial of access under the Public Records Act and the California Constitution, in addition to the explicit denial reflected in your most recent message."

82. As noted, CDPH has taken the position that Exide's request would require it to create a "new record," and that CDPH is not required to do so. CDPH has never provided any authority for the proposition that Exide's request entails the creation of a new record, nor for the proposition that any requirement of the creation of a new record would justify non-disclosure in the present circumstances. The foregoing facts demonstrate Exide's request does not entail the creation of a new record. Even if it did, in the present circumstances any requirement of the creation of a new record would not justify CDPH's refusal to disclose the information under the CPRA or the California Constitution.

The Records Sought Are Not Exempt from Disclosure, and Must Be Provided

83. Under the CPRA, all records of public agencies must be disclosed unless one of the specifically enumerated exemptions to disclosure under the CPRA applies. (Gov. Code § 6253(b) ["Except with respect to public records exempt from disclosure by express provisions of law, each state or local agency, upon a request for a copy of records that reasonably describes an identifiable record or records, shall make the records promptly available to any person upon payment of fees covering direct costs of duplication, or a statutory fee if applicable."].) Nowhere in CDPH's extensive communications with Exide has CDPH asserted that any specific exemption to disclosure under the CPRA applies to the records sought. CDPH's failure to disclose the records sought violates the CPRA mandate that any non-exempt record must be disclosed.

84. CDPH represented in the December 21 Letter that the information sought by Exide "will allow the identification of, or probable identification of, individuals." To the extent CDPH's assertion that the information sought by Exide "will allow the identification of . . .

individuals" constituted an attempt to assert that the files are subject to withholding pursuant to any specific exemption in the CPRA, that assertion lacks merit.

85. CDPH regularly produces records similar to those sought by Exide in "de-identified" form, *i.e.*, in a form that neither directly identifies an individual nor presents a substantial risk of indirectly identifying any individual. Thus, CDPH demonstrably has the ability to "de-identify" that information by means of redaction such that no exemption in the CPRA would bar public access, CDPH therefore has a legal obligation to provide the requested records.

86. As set forth in detail above, CDPH did not deny Exide's November 24 Request until nearly five months had passed. CDPH's delay constituted a constructive denial of the public's right to access records reflecting the people's business and, thus, a violation of the CPRA. CDPH's subsequent rejection of Exide's request for public records also violated the CPRA.

87. The actions of CDPH violate Exide's rights under the CPRA and the California Constitution because Exide has been denied its right to inspect and obtain copies of records and information obtained by, and in the possession of, a state agency, and because the information sought by Exide is not exempt from disclosure.

88. Exide is beneficially interested in the outcome of this action, and has a clear, present, and substantial right to the release of the records sought herein. Exide has no plain, speedy, and adequate remedy other than the relief sought. No administrative or appellate remedies exist.

89. CDPH's denial of access to the records and information sought by Exide is a willful violation of Government Code section 6253. Government Code sections 6253 and 6255 require all public records to be made available for inspection and copying unless exempt from disclosure under the Public Records Act.

90. CDPH's denial of access to the records and information sought by Exide is a willful violation of Article I, section 3(b) of the California Constitution, which provides that: "The people have the right of access to information concerning the conduct of the people's business, and, therefore, the meetings of public bodies and the writings of public officials and agencies shall be open to public scrutiny."

91. Pursuant to Government Code section 6259(d), Exide is entitled to costs and attorneys' fees incurred pursuing this matter.

92. Pursuant to Government Code section 6258, the times for responsive pleadings and for hearings in actions such as this one shall be set with the object of securing a decision at the earliest possible time.

PRAYER

WHEREFORE, Exide prays as follows:

(a) That the Court determine that CDPH's conduct was and is in violation of applicable provisions of the California Public Records Act, and issue a peremptory writ of mandate commanding CDPH to permit public access to and copying of the records sought by Exide;

(b) That Exide be awarded its costs and attorneys' fees incurred pursuing this matter; and

(c) For such other and further relief as the Court deems just and proper.

Dated: April 25, 2016

SHEPPARD, MULLIN, RICHTER & HAMPTON LLP

By _____

JAMES M. CHADWICK
DAVID E. SNYDER
Attorneys for EXIDE TECHNOLOGIES

VERIFICATION

I, James M. Chadwick, declare as follows:

1. I am counsel for Exide Technologies, petitioner in the above-named action, and I am authorized to make this verification on its behalf.

2. I have read the foregoing VERIFIED PETITION FOR WRIT OF MANDATE and know the contents thereof, and certify that the same are true of my own knowledge, except as to the matters which are stated on information and belief, and as to those matters, I believe them to be true.

3. I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed April 25, 2016 at Palo Alto, California.

By _____

James M. Chadwick

EXHIBIT A

SheppardMullin

Sheppard, Mullin, Richter & Hampton LLP
379 Lytton Avenue
Palo Alto, California 94301-1479
650.815.2600 main
650.815.2601 fax
www.sheppardmullin.com

650.815.2605 direct
jchadwick@sheppardmullin.com

November 24, 2015

VIA E-MAIL AND FEDEX

Public Information Officer
California Department of Public Health
PO Box 997377, MS 0500
Sacramento, CA 95899-7377
E-Mail: ICDPH.InternetAdmin@cdph.ca.gov

Re: Public Records Act Request Regarding Blood Lead Data

To the Public Information Officer for the California Department of Public Health:

Pursuant to the provisions of the California Public Records Act ("Act"), Government Code § 6250 *et seq.*, and Article I, section 3(b) of the California Constitution, we hereby request the following records: Data generated or received pursuant to the California State Childhood Lead Poisoning Prevention Act and/or Health & Safety Code Section 124130 with respect to individuals in Los Angeles County from January 1, 2007 to the present.

Specifically, this request seeks, with respect to each individual in Los Angeles County whose blood lead level has been tested from 2007 to the present, the following information:

- Any unique identification numbers or codes assigned to subjects of testing (including any unique identifier(s) that are or can be used to determine if a subject was tested more than once within a year), but not including any potentially public identification numbers or codes utilized for purposes, such as Social Security Number or Driver's License Number;
- Blood lead level (ug/dL);
- Blood lead level detection limit;
- Date that blood lead was sampled;
- Age of person tested in bands (i.e., less than 6 years, Age 6 to 21 years, over 21 years);
- City in which the individual tested resides;
- Zip code in which the individual tested resides;

- Age of the building in which the individual resides;
- Collection method (capillary or venous); and
- Whether the blood lead concentration triggered an investigation, and the conclusion of that investigation (including, any conclusion or data as to the source of the lead).

We request that the data be provided in Excel or Access format, or in the most accessible electronic format reasonably available.

We emphasize that we are not seeking any individually identifiable information. The data should not include individual patient names, addresses, telephone numbers, names of parents, guardians, relatives, or physicians, potentially public identifiers such as Social Security Numbers or Driver's License Numbers, nor any other information that uniquely identifies any individual. Rather, all such identifying information should be redacted from the records provided pursuant to this request.

It is our understanding that the Department of Public Health maintains, among other records, the following:

- A table listing the 20 Los Angeles County Zip codes with the highest number of children under 6 years old with blood lead levels greater than 4.5 ug/dL for the year 2012;
- A table listing blood lead levels by Zip code and age group for the year 2012; and
- A table listing by Zip code the number of people under 21 years old with blood lead levels greater than 9.5 ug/dL for the years 2009-2012.

We understand that you also maintain data with respect to the age of the homes in which the persons tested reside. We request that you provide this information as well. If it is included in the tables, it should be maintained and provided along with the other data included in these tables. If it is not included in these tables, it should be provided together with a unique, non-public identifier that can be used to correlate it with the data included in the tables.

We request that you include these tables in the records provided in response to this request. We also request that you provide comparable tables for all years from 2007 through 2014, for all Los Angeles County Zip codes. To be clear, by requesting these tables we are not limiting the scope of this request to just these tables. Rather, we request all of the data described above. However, as it appears that these tables may already exist in a de-identified format that can be readily provided, we request you to provide them promptly, in addition to the other records requested.

It is also our understanding that that the existing tables maintained by the Department of Public Health may omit Zip codes with less than 100 observations (i.e., less than 100 people tested). We request that all Los Angeles County Zip codes be included. Presumably, your concern with disclosing Zip codes with smaller numbers is based on the privacy of test

participants. (There does not appear to be any other possible justification.) However, if the information contained in these tables is confined to the number of persons in a particular age group and Zip code with certain levels of blood lead, there is no threat to privacy from the disclosure of the tables even if the tables include only one person in a particular Zip code. No individual could be re-identified based on the disclosure of this information alone or in combination with the other variables we are requesting.

If, despite this explanation, you believe that there is a concern that disclosure of the requested information with respect to Zip codes with less than 100 observations could be problematic, please be aware that other federal and state agencies that provide de-identified records have found that it is not. Agencies that provide de-identified information that includes more unique, publicly-knowable variables than those we are seeking here routinely use much smaller "cell" sizes (a "cell" being a group of individuals that share a set of publicly-knowable characteristics that could be used to identify them even in the absence of other unique, identifying information such as name or address). Typically, a cell size of ten is used. This is the threshold used, for example, by the California Department of Health Care Services. (See Public Aggregate Reporting – DHCS Business Reports Guidelines, August, 2014.) Furthermore, rather than omitting altogether Zip codes with a number of observations below a particular threshold (whether 10, 100, or some other number), we request that you aggregate adjacent Zip codes until that threshold is met, and provide the records in a manner that shows the Zip codes that were aggregated in this manner.

The California Constitution provides that "[t]he people have the right of access to information concerning the conduct of the people's business, and, therefore, the meetings of public bodies and the writings of public officials and agencies shall be open to public scrutiny." Cal. Const., Art. I, sec. 3(b)(1). The Act requires that public records be open to inspection at all times, and that documents should be provided promptly. *See* Cal. Gov't Code § 6253(a). The requested documents are public records under the California Constitution and as defined by the Act.

In addressing this request, please keep in mind that the California Constitution expressly requires you to broadly construe all provisions that further the public's right of access, and to apply any limitations on access as narrowly as possible. Cal. Const., Art. 1, sec. 3(b)(2). The Act recognizes "no limitations on access to a public record based upon the purpose for which the record is being requested, if the record is otherwise subject to disclosure." Cal. Gov't Code § 6257.5.

The Act prohibits using any provision of the Public Records Act "to delay the access for purposes of inspecting public records." Cal. Gov't Code § 6253(d). In addition, the Act requires public agencies and officials to assist the public in making a focused and effective request by: (1) identifying records and information responsive to the request; (2) describing the information technology and physical location in which the records exist; and (3) providing suggestions for overcoming any practical basis for denying access to the records or information sought. Cal. Gov't Code § 6253.1. We request that you provide this mandated assistance, in order to assist us in identifying the correct records and ensuring that any concerns regarding the provision of access to these records can be addressed and resolved.

To this end, we request that you provide a comprehensive description of all blood lead data generated pursuant to the California State Childhood Lead Poisoning Prevention Act that you maintain, including: (1) All data variables and/or fields you have with respect to individuals tested; (2) the years for which you maintain such records; and (3) record layouts or other records sufficient to show how the tables, databases, or other materials you have containing such information are organized, including but not limited to column and row headings. We also request that you provide all written rules, regulations, or guidelines adopted or used by the Department of Public Health with respect to the disclosure of health records you maintain, and in particular with respect to the disclosure of aggregate, de-identified information. We are happy to discuss this request with you and to clarify the request in any manner necessary to ensure that you clearly understand the records we seek and that only anonymous, de-identified data is disclosed.

We will pay for the reasonable and direct costs of duplicating the documents. *See* Cal. Gov't Code § 6253(b). Please note that the direct costs of duplication include only the cost of making copies, and do not include the retrieval, inspection, or handling of the file from which the copy is extracted. *North County Parents v. Dept. of Education* (1994) 23 Cal.App.4th 144,148.

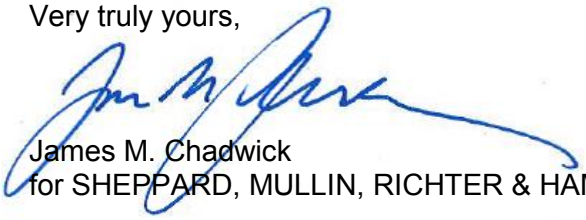
We understand that you may have concerns regarding disclosure of the requested records in a form that identifies individuals who have been tested. In particular, we understand that you may be concerned that such information is exempt from disclosure or confidential pursuant to Government Code section 6254(c), Civil Code section 1798 et seq., and/or Health and Safety Code section 124130. However, as you are probably aware, the disclosure of anonymous, de-identified data does not contravene such restrictions. See, e.g., *Poway Unified School Dist. v. Superior Court* (1998) 62 Cal.App.4th 1496, 1505-1506 (redaction of released records satisfied the constitutional right of privacy); *Bible v. Rio Properties, Inc.* (C.D. Cal. 2007) 246 F.R.D. 614, 620 (informational privacy interests under California Constitution would be protected if personal information, "such as address, date of birth, telephone number" were redacted from released records); *London v. New Albertson's, Inc*. (S.D. Cal. 2008) 2008 WL 4492642 (claim of invasion of California constitutional privacy right based on disclosure of de-identified medical information did not allege a legally protected privacy interest). See also *U.S. Dep't of State v. Ray* (1991) 502 U.S. 164, 175-78 (redaction sufficient to safeguard personal privacy of Haitian nationals interviewed by State Department in connection with their involuntary repatriation); *Osborn v. Bd. of Regents of the U. of Wis. System* (2002) 254 Wis.2d 266, 275, 291-292, 647 N.W.2d 158, 162-163, 170-171 (compelling disclosure of education records after redaction of identifying information); *Abbott v. Texas Dept. of Mental Health* (Tex. App. 2006) 212 S.W.3d 648 (disclosure of de-identified records of incidents of abuse and sexual assault at state mental health facilities required under state public records law); *Steinberg v. CVS Caremark Corp.* (E.D. Pa. Feb. 16, 2012) 2012 WL 507807 (no violation of HIPAA and hence no violation of state law based on disclosure of de-identified medical information); *In re Zyprexa Products Liability Litigation* (E.D.N.Y. 2008) 254 F.R.D. 50 (disclosure of de-identified records of patients who took anti-psychotic drugs does not violate HIPAA nor physician-patient privilege).

If, despite these explanations, you believe that the records requested herein are not subject to disclosure, you must promptly notify us of your determination, the names and titles of the persons responsible for that determination, and the reasons therefor. Cal. Gov't Code

§ 6253(c). Such notification must be provided no later than ten (10) days from your receipt of this request, and no extension of this time is permitted except in the limited, unusual circumstances specified by the Act. Cal. Gov't Code § 6253(c). In addition, you must provide us with any reasonably segregable portion of any record that you believe contains information not subject to disclosure. Cal. Gov't Code § 6253(a).

Thank you for your prompt attention to this request. If you do not understand any aspect of this request or would like clarification, please contact me at 650-815-2605, and we will make every effort to address your concerns.

Very truly yours,



James M. Chadwick
for SHEPPARD, MULLIN, RICHTER & HAMPTON LLP

SMRH:473821118.2

EXHIBIT B

State of California—Health and Human Services Agency
California Department of Public Health

KAREN L. SMITH, MD, MPH
Director and State Public Health Officer

EDMUND G. BROWN JR.
Governor

December 7, 2015

James Chadwick
Sheppard, Mullin, Richter & Hampton, LLP
379 Lyfton Avenue
Palo Alto, CA 94301-1479

Dear James Chadwick:

On November 24, 2015, the Department of Public Health (CDPH) received your letter dated November 24, 2015, requesting records under the Public Records Act. CDPH is in the process of gathering and reviewing the requested records. Your request will take extra time to fulfill because:

- You have requested a voluminous amount of records.
- You have requested records stored in multiple areas and multiple formats.

Consequently, CDPH is exercising its authority under Government Code, section 6253, subdivision (c), to extend the time to reply to a Public Records Act request. By December 21, 2015, CDPH will let you know if we have responsive records.

If you have any questions regarding this matter, please contact me at (510) 620-5616.

Sincerely,

Richard Votava, Chief
Operation Support Section

EXHIBIT C

State of California—Health and Human Services Agency
California Department of Public Health

KAREN L. SMITH, MD, MPH
Director and State Public Health Officer

EDMUND G. BROWN JR.
Governor

December 21, 2015

Mr. James Chadwick
Sheppard, Mullin, Richter & Hampton, LLP
379 Lytton Avenue
Palo Alto, CA 94301-1479

Dear Mr. Chadwick:

We are providing further response to your Public Records Act request of November 24, 2015.

In your request, you asked for data generated or received pursuant to the California State Childhood Lead Poisoning Prevention Act and/ or Health and Safety Code Section 124310, with respect to individuals in Los Angeles County from January 1, 2007, to the present.

Specifically, you requested:

- "A table listing the 20 Los Angeles County Zip codes with the highest number of children under 6 years old with blood lead levels greater than 4.5 µg/dL for the year 2012."
- "A table listing blood lead levels by Zip code and age group for the year 2012."

California Department of Public Health (CDPH) response: These tables are available and are being provided with this response.

You requested:

- "A table listing by Zip code the number of people under 21 years old with blood lead levels greater than 9.5 µg/dL for the years 2009-2012."

CDPH response: A table similar to this request is available but only exists for the years 2009-2011. This table is being provided with this response.

You requested:

- "We also request that you provide comparable tables for all years from 2007 through 2014, for all Los Angeles County Zip codes."

CDPH response: Tables for these additional years do not currently exist.

You requested:

- "It is our understanding that the existing tables maintained by the Department of Public Health may omit Zip codes with less than 100 observations (i.e. less than 100 people tested). We request that all Los Angeles County Zip codes be included."

CDPH response: Tables with these smaller numbers of observations are not available.

You requested "that you provide a comprehensive description of all blood lead data generated pursuant to the California State Childhood Lead Poisoning Prevention Act that you maintain, including: (1) All data variables and/or fields you have with respect to individuals tested; (2) the years for which you maintain such records, and (3) record layouts or other records sufficient to show how the table, database, or other materials you have containing such information are organized, including but not limited to column and row headings."

CDPH response: We have identified data dictionary information for the Response and Surveillance System for Childhood Lead Exposure (RASSCLE 2). RASSCLE 2 contains laboratory data reported to CDPH beginning in the 1990s on high blood lead levels and limited blood lead testing information previously received electronically. Since 2007, virtually all laboratory testing information has been submitted to CDPH, has been received electronically, and is in RASSCLE 2. RASSCLE 2 also contains information that has been obtained related to childhood lead poisoning case investigations, which may be incomplete.

We are providing the RASSCLE 2 data dictionary information that has been identified with this response. There is both an earlier version and a subsequent version. This information may not be up to date and may be incomplete. We are also supplying additional associated documents that may further explain the system.

Information from RASSCLE 2 relating to reported blood lead test results is also contained in periodic data CDs and in bi-weekly reports that are sent to individual local jurisdictions. We have identified, and are providing, documents on these data formats.

We have identified statewide data extracts done from 1992 through 2011. Earlier extracts would have been taken from the original RASSCLE system, whose information was down loaded into the current RASSCLE 2. Extracts are not available for all years. For your years of interest, we have identified 2008 through 2011. We are providing a document explaining the format of these extracts.

There is an additional database for adult blood lead levels called the Elevated Lead Visual Information System (ELVIS) which receives laboratory testing information for

individuals ages 16 and up. The current version, ELVIS II, was implemented in September 2007, and blood lead data received in previous years was imported into ELVIS II. The majority of the individuals described in the data work in industries handling lead, and for others the source of lead exposure may be non-occupational or unknown. ELVIS also contains some information related to case investigations of occupational lead exposures and other follow-up activities (e.g., educational letters sent) for blood lead levels above 10 ug/dL. We have identified and are providing, as an attachment, a data dictionary for ELVIS II.

There is some duplication of blood lead information held in ELVIS II and RASSCLE 2. Historically RASSCLE 2 had entered BLL information on individuals up to age 21 years. In 2009, RASSCLE began to accept information on individuals of all ages.

You requested "with respect to each individual in Los Angeles County whose blood lead level has been tested from 2007 to the present, the following information:

- Any unique identification number or codes assigned to subjects of testing (including any unique identifier(s) that are or can be used to determine if a subject was tested more than once within a year), but not including any potentially public identification numbers or codes utilized for purposes, such as Social Security Number or Driver's License Number;
- Blood lead level (µg/dL);
- Blood lead level detection limit;
- Date that blood lead was sampled;
- Age of person tested in bands (i.e. less than 6 years, Age 6 to 21 years, over 21 years);
- City in which the individual tested resides;
- Zip code in which the individual tested resides;
- Age of the building in which the individual resides;
- Collection method (capillary or venous); and
- Whether the blood lead concentration triggered an investigation; and the conclusion of that investigation (including, any conclusion or data as to the source of the lead)."

<u>CDPH response</u>: We do not have existing records with the information requested.

Additionally, CDPH does not have access to particular information that you are seeking. Age of the building in which an individual tested for blood lead resides is not routinely known. It would usually only be available in the limited number of instances where the residence receives an inspection in relation to a lead-poisoned child. The laboratory blood lead detection limit would not necessarily be known. The reporting limit may be

known in those instances where a specific test is clearly indicated as falling outside that limit.

Further, the combination of information you requested will allow identification of, or probable identification of, individuals. For example, the city of Vernon, California, according to the 2010 US Census, had only one child under the age of 5 residing.

You also requested "that you provide all written rules, regulations, or guidelines adopted or used by the Department of Public Health with respect to the disclosure of health records you maintain and with respect to the disclosure of aggregate, de-identified information."

CDPH response: No CDPH documents exist on your general question. Strict confidentiality of information obtained on individuals who receive blood lead testing is clearly mandated in Health and Safety Code 124310 (g). Further, Government Code section 6254(c) prevents the disclosure of medical information. CDPH looks to the HIPAA de-identification standard in 45 C.F.R. §164.514(b)(2)(ii) for guidance on when information is de-identified and cannot release information that "could be used alone or in combination with other information to identify an individual who is a subject of the information."

CDPH is willing to work with you to narrow the requested data to something that could be extracted from the database and compiled in a way that our epidemiologists determine is not identifiable. Creating this type of specific record will take considerable time and resources, the cost of which would be covered by the requester per Government Code 6253.9(b)(2).

While not requested, we do have the following documents now available, which may be of interest:

1) A table which provides information on the top 200 Zip codes for California, with the highest number of children under age 6 years with blood lead levels at and above 4.5 µg/dL in 2012;
2) A table indicating which Zip codes were omitted from the top 200 Zip codes because less than 500 children were tested. (This distinguishes those Zip codes from ones omitted because they were not among those with high numbers of children with increased blood lead levels.)
3) A recent, limited analysis of young children up to age 6 years, who were identified as State cases of lead poisoning in the period January 1, 2012, to October 1, 2015, and who resided in the aggregate address areas with a Zip code of 90022, 90023, 90040, 90058, 90063, 90201, 90255, or 90270, or in the city of Bell, Bell Gardens, Commerce, Cudahy, East Los Angeles, Huntington Park, Maywood, Vernon, or Walnut Park. These children would have had blood

lead levels of ≥19.5 µg/dL or persistent blood lead levels of ≥14.5 to 19.4 µg/dL. Information includes findings from their lead poisoning investigations and general age of housing.

Please let us know if you wish to receive any of these documents.

Sincerely,

Richard Votava

Richard Votava, M.Acc., M.P.H., Chief,
Operation Support Section

Enclosure

EXHIBIT D

An Analysis of Children's Blood Lead Levels in the Area Around the Exide Site
California Department of Public Health
Childhood Lead Poisoning Prevention Program

At the initial request of Cal EPA, the California Department of Public Health's Childhood Lead Poisoning Prevention Branch analyzed blood lead data for children living in the area around the Exide site located in the city of Vernon in Los Angeles County. The analysis area was chosen based on maps provided by the Department of Toxic Substances Control that showed census tracts within 1.3 miles, 1.7 miles and 2 miles from the Exide site. In order to identify children living in this area, we selected from our database individuals younger than six years of age at the time of their blood lead test during calendar year 2012 who lived in the following cities or zip codes:

Bell, Bell Gardens, Commerce, Cudahy, East Los Angeles, Huntington Park, Maywood, Vernon, Walnut Park.

Zip codes 90022, 90023, 90040, 90058, 90063, 90201, 90255, and 90270. These zip codes include the cities listed above as well as areas of the City of Los Angeles and unincorporated areas that are in the area of interest.

We will refer to this area as the Exide Analysis Area.

The Childhood Lead Poisoning Prevention Branch receives blood lead results from laboratories and other providers for all California residents. By law these results are submitted electronically. The lab data typically contains patient name, address, date of birth, provider and lab information, and lead test result, which may include the reporting threshold level (results are often reported as being below a certain threshold, such as "< 3.0 µg/dL") and the draw method (such as capillary or venous). The data are stored in a large relational database called RASSCLE.

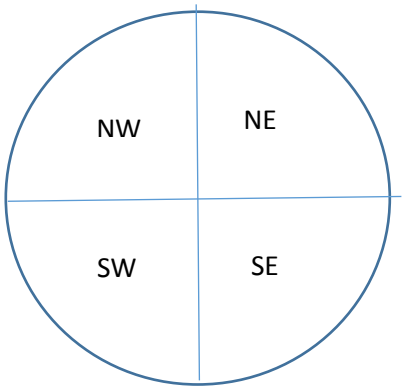
The study population comprised all children age younger than six years living in the Exide Analysis Area who had a blood lead test result reported to the State for a specimen obtained during 2012. The State works to ensure complete reporting of all blood lead analyses. Results that were not submitted to the State, however, would not be included in the analysis. Results were classified as having higher lead levels if they were ≥ 4.5µg/dL (micrograms of lead per deciliter of whole blood). In those occasions where a lab reported a result as "< 5 µg/dL" the result was classified in the < 4.5 group. Each individual was counted only once, using their highest blood lead level during 2012. The child's residence at the time of their highest BLL in 2012 was the one used for geographic analyses. We excluded the five results that were determined to be false positives, and also excluded duplicates and clerical errors. Children with higher BLLs who had a prior level of ≥ 4.5 at a different address were also excluded. A total of 11,702 children met the conditions for inclusion in the analysis. Of these, 285 (2.44%) had levels ≥ 4.5 µg/dL, and 18 (0.15%) had levels ≥ 9.5 µg/dL (the CDC's older level of concern).

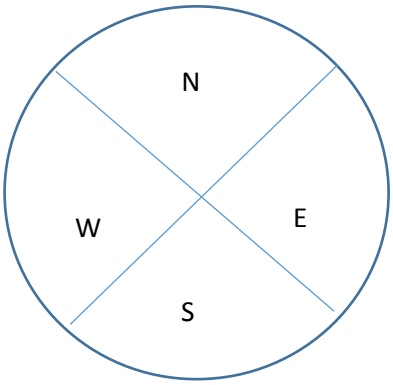
The Exide Analysis Area lies about five miles southeast of downtown Los Angeles. The area that is within a half a mile of the Exide site is primarily industrial and is crossed by numerous railroad lines and the Los Angeles River. Outside this area are mixed residential and industrial areas. Several of the busiest and oldest freeways in Southern California pass through these neighborhoods. Most homes and apartments were built before 1960. A very high proportion of the residents are Hispanic. In 2012, of 11,702 young children tested in the Analysis Area, the nearest child's residence was 0.62 miles from the plant, while the furthest residence from the Exide site was 4.4 miles.

We geocoded 97.6% of the children's addresses to a precise latitude and longitude, which allowed for calculation of the straight-line distance to the Exide site and the compass direction from the site. We were able to assign census tracts, based on the 2010 US Census boundaries, for 97.7%, including 98.2% of those with levels ≥ 4.5. Demographic data and housing characteristics for the census tracts were obtained from the US Census website using the five-year averages from the 2012 American Community Survey. Note that these data are self-reported by the resident. The number and proportion of children with higher BLLs and the location of the census tract with respect to the Exide site are shown in Table 1. We excluded from the table tracts with fewer than 50 young children tested that were outside a two-mile radius from the Exide site. There were three census tracts at least partly within the two-mile buffer zone in which fewer than 50 young children were tested. Data from these tracts were aggregated with adjacent tracts that had similar characteristics. No census tract had more than two children with blood lead levels ≥ 9.5 µg/dL. In seven of the tracts more than 5% of children had BLLs ≥ 4.5 (tracts 530901, 533602, 534403, 534803, 533701, 531602, and 532604), while six tracts had no children with BLLs above that level.

Looking first at the univariate effect of distance from the child's residence at the time of their blood draw, children with higher blood lead levels lived slightly nearer to the Exide site (Table 2a) and there was a moderate increase in risk associated with living less than a mile from the plant site (see Table 2b). The proportion of these children with levels of 4.5+ was 3.93%, compared with 2.41% among those who lived in the Analysis Area but farther than 1 mile from the plant (Odds ratio = 1.50, 95% confidence interval 0.85—2.65). For comparison, across all of Los Angeles County in 2012, 1.95% of children age younger than six years had BLLs above 4.5, and 0.22% had levels of 9.5+. A total of 363 children were tested who lived less than a mile from the plant, representing about 3% of the total number of young children in the full analysis. We divided the Analysis Area into five distance zones, with the first three zones based on the original 1.3, 1.7, and 2-mile buffers. Univariate risk of having a higher BLL generally decreased as the distance from the plant decreased, although the effects were smaller in Zones 2-4, with confidence intervals crossing an OR of 1 (see Table 2c). Note that the risk was higher for those living within 1.3 miles than for those living less than a mile. A number of the higher BLLs in the 1.0--1.3 mile range lived very near one of the freeways.

To assess the effect of direction we divided the study area into quadrants centered on the Exide site in two different ways to better identify effects that may overlap quadrants (see diagrams below).





In univariate analyses, the areas to the East and South and Southeast of the Exide site were at lowest risk, with the biggest contrast between the Northeast and Southeast quadrants. (Tables 2d and 2e)

Because the presence of lead hazards in a home is highly dependent on the age of the structure, we examined this risk in several ways: by the proportion of pre-1940 housing in the census tract, the proportion of pre-1950 housing, and the proportion of pre-1980 housing. The US Census reports this data in 10-year categories and a median for the entire tract. (Use of the actual year built for a sub-sample of the data is described below.) Housing built before 1980 is usually assumed to have some lead hazards as the lead content in consumer paint products was not strictly limited until 1978. Using each of the three different year-built cut points demonstrated the expected relation of age of housing stock to risk of higher blood lead levels. The univariate effects were most striking in the older housing groups. (See Tables 2f, 2g, and 2h). The proportion of children living in census tracts with > 40% of housing built before 1940 with BLLs of 4.5+ was 3.11%, compared with 1.87% of those who lived in tracts with < 20% pre-1940 residences (OR= 1.69, 95% CI 1.13—2.52).

Age, sex, race, and ethnicity are also important risk factors for lead exposure. We do not obtain race or ethnicity from the laboratory reports. Demographic characteristics of the census tract where the child lived were used as a proxy. The tracts in the Analysis Area have very high proportions of Hispanic residents. The number of children of other racial/ethnic groups was too few too analyze. Children living in tracts in which more than 95% of children younger than age five years were of Hispanic ethnicity, which accounted for 89% of the study population, had a proportion with BLLs of ≥ 4.5 of 2.54%, versus 1.62% in tracts in which fewer than 90% of the young children were Hispanic (OR=1.59, 95% CI 0.65—3.88). See Table 2i. As seen in other studies, young boys had a higher risk than girls: 2.70% had levels of 4.5 + vs. 2.15% of girls (OR 1.26, 95% CI 1.00-1.60) (See Table 2j) Most of the increase in risk among boys is due to the relatively higher risk in the two older age categories relative to girls (Tables 2l and 2m). Toddlers in the age groups from 9 months to 2.5 years had somewhat higher risk than those 2.5 through five years of age (Table 2k), although boys in the older age group continued to experience elevated risk (Tables 2l and 2m). Babies younger than 9 months had the highest risk; however, few children are routinely screened at this age unless there are reasons to suspect lead exposure, such as those born to a mother exposed during pregnancy, having a lead-poisoned sibling, or the presence of symptoms.

To account for differences in the effect of distance related to direction, we analyzed the effect within each compass quadrant (Table sets 3a and 3b). Using the N,S,E,W scheme we observe generally low levels in the East and South quadrants. The Long Beach Freeway (I-710) passes north-south through Zone 2 of the East quadrant. The South quadrant shows a monotonic decrease in risk as distance from the plant site increases. In the West, the most distant Zone had the highest risk. The condition of the homes in this area is generally poorer and there are a number of industrial metal recycling sites. In the North, there is a decreasing trend from the nearest to the farthest zones. A number of the higher BLLs in North Zone 1 were very near the Santa Ana Freeway (I-5). Analyses using the NW/NE/SW/SE scheme produced fairly similar results.

We used logistic regression models to look at the effects of multiple potential predictors simultaneously on the risk of having a higher BLL using SAS PROC LOGIST v.9.4. Variables were modelled categorically or, when appropriate, as continuous variables (See Table 4). The first set of models replicate the univariate analyses in Table 2. Median year built and distance are modeled as continuous variables, with the *b* coefficients representing the change in risk for each more recent calendar year the average residence in that tract was built and for each additional mile further away from the Exide site, respectively. We also modeled distance after transforming the variable based on the inverse of the distance squared as distance effects may diminish in a non-linear fashion. Models were constructed adding terms for known or potential confounders. Generally, the effects of distance became attenuated

when other predictors were added to the model, both in the magnitude of the distance effect and in higher *p* values. For example, the univariate effect of distance produced a *b* = -0.17 with a *p*-value of 0.03, while a more saturated model that also contained median year built, directional quadrant, age group, and sex reduced the *b* to -0.09 with a *p*-value of about 0.30. Some modest effect for living less than a mile from the plant site remained after controlling for other risk factors. Age of housing in the census tract remained an important predictor. Using the proportion of homes in the census tract built before 1940 or before 1950 were not better predictors than median year built. Increased risk of higher BLLs remained associated with living in the North and West quadrants relative to the South and East, and in the Northwest, Northeast, and Southwest quadrants relative to the Southeast.

In addition to the geographic analysis of the 11,702 children in the Exide Analysis Area, we performed a sub-study in which the actual age of the child's home was used instead of the US Census median age of housing data for their census tract (which was based on the residents' self reports). We attempted to obtain from the Los Angeles County Assessor's Office the year of construction for all the children with blood lead levels of 4.5 +, and a similarly sized sample of children with levels below 4.5. There was sufficient information to obtain the age of the home for 277 of 278 children with higher BLLs and 290 of 292 of the sampled children with lower levels. We then conducted analyses using standard case-control methodology and multivariate logistic regression modeling. (See table 5). Cases were more likely to live in older homes than controls. As in the larger data set, the effect of distance diminished substantially after controlling for confounding variables. A large increased risk was noted for living in a home built before 1925 (multivariate-adjusted OR = 2.00, 95% CI 1.37—2.91), while those living in more recently constructed dwellings had similar risk in the multivariate analyses.

Study Limitations and Strengths

Our analysis is limited to children younger than age six living in the defined geographic Analysis Area who were tested for lead during the year 2012. Results from other time periods may be different, as may analyses of the effects in older children or adults. In this analysis we only examined the determinants of higher blood lead levels, using a dichotomous outcome variable (BLL ≥4.5 µg/dL or < 4.5). Subtle changes in the mean levels of children's blood lead would not have been detectable using this method. Because so many results were reported as falling below a certain threshold level (such as "< 3.0 µg/dL") we were not able to estimate mean or median lead levels. Although we have blood results for over 11,000 children in the geographic area around the plant, fewer than 300 had levels ≥ 4.5 µg/dL. Consequently, when considering multiple factors at the same time, some cell sizes became quite small, limiting the precision of stratified and multivariate analyses. Some effect of distance from the Exide plant at a range of less than a mile, or less than 1.3 miles, remained after accounting for a number of other risk factors; however, there were relatively few observations in this area (for example, there were 13 children with BLLs ≥ 4.5 living within a mile of the plant), so the effect estimates are imprecise. We did not include in the analyses other potential determinants of risk, including proximity to freeways and busy surface streets, and the locations of other current or historic point source lead emitters. Further, data on cultural factors related to risk of elevated blood lead levels, such as use of traditional folk remedies containing lead, or use of lead-glazed ceramics in the home, were not available for these children.

Despite these limitations, our findings were consistent with expectations of known lead risk factors, providing important empiric validity. Our electronic blood lead reporting system captures a very high fraction of lead tests done on California children. We were able to successfully geocode a very high proportion of the children's home addresses, allowing precise calculation of the distance and compass direction from the Exide site for use in the analyses. Although we analyzed data from 2012 only, lead

deposits are usually not transient and can remain in the environment for decades. Although we could not calculate mean blood lead levels, large effects in mean levels due to the Exide plant should have also manifested to some degree in the distribution of higher blood lead levels. Our multivariate analyses were able to account for other important determinants in addition to the distance and direction from the Exide plant. The importance of the age of housing as an independent risk factor and potential confounder was reinforced in a case-control substudy we conducted that used the actual age of the child's residence. This substudy provided further validation of the multivariate analyses that found a diminished effect of distance from the plant on risk of higher blood lead levels when other risk factors were taken into account.

Table 1. Census tracts (2010 boundaries) of children age < 6 years tested in 2012 living in the Exide Analysis Area. Tracts with fewer than 50 children tested have been excluded or aggregated.

Census Tract (excludes "6037" prefix)	Children age < 6 years with BLL ≥ 4.5 in 2012	Total number of children age < 6 yrs with blood lead test in 2012	% of children with BLL ≥ 4.5	% Census tract in 1.3 mi Buffer	% Census tract in 1.7 mi Buffer	% Census tract in 2 mi Buffer	Notes
203200	0	51	0.00%				3 mi N (off map)
203800	5	132	3.79%				2.3 mi N
203900	2	72	2.78%		15%	65%	1.7--2.2 mi N
204110	3	71	4.23%				2.5 mi N/NW
204120	4	91	4.40%			50%	N/NW
204600* + 206050	3	80	3.75%				2--2.5 mi NW. *Counts aggregated with 206050
204700	2	144	1.39%		5%	35%	NW
204810	5	137	3.65%	1%	60%	97%	N/NW
204820	2	55	3.64%	15%	99%	100%	NW
204910	3	93	3.23%	35%	100%	100%	N
204920	2	75	2.67%	100%	100%	100%	N/NW
205110	4	147	2.72%		40%	85%	NW
205120	4	117	3.42%	35%	80%	99%	NW
206050*					2%	15%	NW *Counts aggregated with 204600
530301	1	50	2.00%				2.5--3 mi NE (off map)
530302	2	157	1.27%				2.5--3 mi NE (off map)
530500	1	106	0.94%				2.3--2.6 mi NE
530601	0	80	0.00%				2.5 mi N/NE
530700	1	59	1.69%				3.5 mi N
530801	10	201	4.98%				3 mi N
530802	0	77	0.00%				3 mi N
530901	7	115	6.09%				2.5 mi N
530902	4	106	3.77%				3 mi N
531000	5	153	3.27%				2.5 mi N/NE
531101	4	134	2.99%			30%	N
531102	3	108	2.78%			7%	N
531201	6	163	3.68%		40%	95%	N
531202	3	137	2.19%	5%	95%	100%	N

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531301	6	160	3.75%	50%	100%	100%	N/NE
531302	8	167	4.79%	95%	100%	100%	N/NE
531502	1	67	1.49%		60%	100%	NE
531503	2	86	2.33%		15%	40%	NE
531504	3	108	2.78%			25%	NE
531602	6	118	5.08%		15%	70%	NE
531603	1	104	0.96%				NE
531604	1	92	1.09%			5%	NE
531701	5	159	3.14%				NE
531702	1	146	0.68%		0%	40%	E/NE
531800	3	135	2.22%				2.5 mi E/NE (off map)
531901	1	167	0.60%				2.5 mi E/NE (off map)
531902	3	99	3.03%				2.5 mi E/NE (off map)
532302* + 532400	4	136	2.94%	65%	85%	98%	E/NE. Counts aggregated with 532400
532303	2	96	2.08%		10%	20%	75% off map
532304	4	99	4.04%	10%	20%	25%	50% off map
532400*				50%	65%	80%	Contains Exide site. 15% off map to W. *Counts aggregated with 532302
532500	1	109	0.92%		10%	70%	SW
532603	3	118	2.54%				2.3--2.5 mi SW (label off map)
532604	5	99	5.05%				2.3--2.5 mi SW
532605	2	95	2.11%				2--2.3 mi SW
532606	4	125	3.20%			5%	SW
533103	2	128	1.56%				SW
533104	3	131	2.29%				SW
533105	1	100	1.00%			30%	SW
533106	2	60	3.33%				2 -- 2.3 mi SW
533107	4	117	3.42%				2.2--2.4 mi S/SW
533201	0	83	0.00%		7%	95%	S/SW

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533202	1	76	1.32%			20%	S/SW
533203	2	58	3.45%				2.2 mi S/SW
533300	6	145	4.14%	100%	100%	100%	S/SW
533401	4	148	2.70%	100%	100%	100%	S
533402	2	107	1.87%	100%	100%	100%	S
533403	2	75	2.67%	50%	99%	100%	S/SE
533501	1	86	1.16%	10%	100%	100%	S/SW
533502*				10%	100%	100%	S *Counts aggregated with 533503
533503* + 533502	2	101	1.98%	5%	100%	100%	S/SE *Counts aggregated with 533502
533601	2	129	1.55%		25%	100%	S
533602	9	163	5.52%			50%	S
533603	3	223	1.35%				2.1--2.3 mi S
533701	6	113	5.31%	40%	100%	100%	SE
533702	2	120	1.67%		65%	100%	S/SE
533703	0	131	0.00%		15%	60%	SE
533803	1	160	0.63%			30%	SE
533804	3	135	2.22%			15%	SE (label not visible on map)
533805	1	99	1.01%				SE (label not visible on map)
533806	4	135	2.96%				SE (label not visible on map)
533901	2	188	1.06%				2.3--2.5 mi SE (not on map)
533902	1	124	0.81%				2.5 mi SE (not on map)
534001	4	166	2.41%				2.5 mi SE (not on map)
534002	1	139	0.72%				2.5 mi SE (not on map)
534101	1	57	1.75%				2.3 mi SE (label not visible on map)
534102	3	184	1.63%				2.4 mi SE (not on map)
534201	3	151	1.99%				2.7 mi SE (not on map)
534202	4	209	1.91%				2.7 mi SE (not on map)

Table 1. Census tracts (2010 boundaries) of children age < 6 years tested in 2012 living in the Exide Analysis Area. Tracts with fewer than 50 children tested have been excluded or aggregated.

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534203	1	102	0.98%				2.9 mi SE (not on map)
534301	0	150	0.00%				2.6 mi S/SE (not on map)
534302	1	116	0.86%				2.7 mi SE (not on map)
534403	5	92	5.43%				2.2--2.4 mi S
534404	1	131	0.76%				2.3--2.5 mi S/SE
534405	1	154	0.65%				2.3--2.5 mi S/SE (label not visible on map)
534406	1	137	0.73%				2.5 mi SE (not on map)
534501	5	165	3.03%				2.3--2.5 mi S/SW
534502	2	118	1.69%				2.2--2.4 mi S
534700	4	127	3.15%				2.3--2.5 mi SW
534802	2	106	1.89%				2.4--2.6 mi SW
534803	9	166	5.42%				2.5 mi SW
534804	4	127	3.15%				2.6 mi SW

Notes for blood lead data

Data from RASSCLE surveillance database archive of 12/17/2014. Some additional corrections have been made.

* Measures are in µg/dL (micrograms per deciliter) of whole blood

All results of blood lead analyses are reportable under California law, and the State works to ensure complete reporting. Results that are not submitted to the State, however, would not be included here.

Those blood lead levels reported from the analyzing laboratory as "< 5 µg/dL" are included in the category "BLL < 4.5"

Each individual is counted only once, using their highest blood lead level during 2012.

If an individual moved between two jurisdictions, then the child's residence at the time of their highest blood lead level is the one counted.

Includes census tracts with at least 50 children age < 6 years tested during 2012.

We were unable to identify the census tract for 270 children, including 5 with elevated lead levels.

* We aggregated blood lead result counts for census tracts that lie at least partly within a two-mile radius from the Exide site, but which had fewer than 50 children tested during 2012. Adjacent tracts with similar characteristics were aggregated.

Data should be considered as preliminary and subject to revision.

Table 2

Analysis based on children in the RASSCLE-2 database age < 6 years at the time of their blood draw in 2012 who had sufficient address information to geocode and census tract their location (n=11,705)
There was insufficient accurate information to geocode the addresses of 277 children.
Outcome variable is having had a blood lead level of 4.5 mcg/dL or greater during 2012, excluding false positive results.

2a.	**BLL ≥ 4.5**	**BLL < 4.5**	
Mean distance from Exide (in miles)	2.36	2.46	p-value for t-test of equal means = 0.03
Median distance from Exide (in miles)	2.45	2.52	
Distance from Exide (in miles)--Range	0.84--4.22	0.62--4.39	

2b.

Distance of child's home at time of blood draw from Exide site	**Children age < 6 years with BLL ≥ 4.5 in 2012**	**Total number of children age < 6 yrs with blood lead test in 2012**	**% of children with BLL ≥ 4.5**	**Odds Ratio**	**95% Confidence Interval**
< 1 mile	13	363	3.58%	1.50	0.85--2.65
≥ 1 mile	267	11,062	2.41%	ref	

2c.

Zone (distance of child's home at time of blood draw from Exide site)	**Children age < 6 years with BLL ≥ 4.5 in 2012**	**Total number of children age < 6 yrs with blood lead test in 2012**	**% of children with BLL ≥ 4.5**	**Odds Ratio**	**95% Confidence Interval**
1 (< 1.3 mi)	36	982	3.67%	1.82	1.19--2.77
2 (1.3--1.69 mi)	29	1,062	2.73%	1.34	0.85--2.10
3 (1.7--1.99 mi)	28	1,249	2.24%	1.09	0.69--1.73
4 (2.0--2.99 mi)	129	5,308	2.43%	1.19	0.87--1.63
5 (3.0--4.5 mi)	58	2,824	2.05%	ref.	
Total	280	11,425	2.45%		

2d

Quadrant (distance of child's home at time of blood draw from Exide site)	Children age < 6 years with BLL ≥ 4.5 in 2012	Total number of children age < 6 yrs with blood lead test in 2012	% of children with BLL ≥ 4.5	Odds Ratio	95% Confidence Interval
East (NE - SE)	41	2,036	2.01%	1.10	0.75--1.63
West (NW - SW)	76	2,590	2.93%	1.70	1.24--2.33
North (NW - NE)	96	3,134	3.06%	1.62	1.16--2.26
South (SW- SE)	67	3,665	1.83%	ref.	
Total	280	11,425	2.45%		

2e.

Quadrant (distance of child's home at time of blood draw from Exide site)	Children age < 6 years with BLL ≥ 4.5 in 2012	Total number of children age < 6 yrs with blood lead test in 2012	% of children with BLL ≥ 4.5	Odds Ratio	95% Confidence Interval
Northwest (W - N)	39	1,226	3.18%	1.98	1.31--2.98
Northeast (N - E)	96	3,574	2.69%	1.66	1.19--2.31
Southwest (S - W)	88	3,141	2.80%	1.73	1.24--2.43
Southeast (E - S)	57	3,484	1.64%	ref.	
Total	280	11,425	2.45%		

2f.

Percent of housing in census tract built before 1940	Children age < 6 years with BLL ≥ 4.5 in 2012	Total number of children age < 6 yrs with blood lead test in 2012	% of children with BLL ≥ 4.5	Odds Ratio	95% Confidence Interval
< 20%	72	3,856	1.87%	ref.	
20% - 29.9%	72	2,898	2.48%	1.34	0.96--1.86
30 - 39.9%	98	3,461	2.83%	1.53	1.13--2.08
> 40%	37	1,189	3.11%	1.69	1.13--2.52
Total	279	11,404	2.45%		

2g.

Percent of housing in census tract built before 1950	Children age < 6 years with BLL ≥ 4.5 in 2012	Total number of children age < 6 yrs with blood lead test in 2012	% of children with BLL ≥ 4.5	Odds Ratio	95% Confidence Interval
< 30%	38	2,248	1.69%	ref.	
30% - 39.9%	45	1,587	2.84%	1.70	1.10--2.63
40 - 59.9%	161	6,440	2.50%	1.49	1.05--2.13
> 60%	35	1,129	3.10%	1.86	1.17--2.96
Total	279	11,404	2.45%		

2h.

Percent of housing in census tract built before 1980	Children age < 6 years with BLL ≥ 4.5 in 2012	Total number of children age < 6 yrs with blood lead test in 2012	% of children with BLL ≥ 4.5	Odds Ratio	95% Confidence Interval
< 70%	24	1,259	1.91%	ref.	
70% - 79.9%	19	1,125	1.69%	0.88	0.48--1.62
80 - 89.9%	101	3,899	2.59%	1.37	0.87--2.15
> 90%	135	5,121	2.64%	1.39	0.90--2.16
Total	279	11,404	2.45%		

2i.

Percent of children age < 5 years in census tract who were Hispanic	Children age < 6 years with BLL ≥ 4.5 in 2012	Total number of children age < 6 yrs with blood lead test in 2012	% of children with BLL ≥ 4.5	Odds Ratio	95% Confidence Interval
< 90%	5	309	1.62%	ref.	
90% - 94.9%	17	991	1.72%	1.06	0.39--2.90
95% - 100%	257	10,099	2.54%	1.59	0.65--3.88
Total	279	11,399	2.45%		

2j.

Sex	Children age < 6 years with BLL ≥ 4.5 in 2012	Total number of children age < 6 yrs with blood lead test in 2012	% of children with BLL ≥ 4.5	Odds Ratio	95% Confidence Interval
Female	123	5,708	2.15%	ref.	
Male	162	5,993	2.70%	1.26	1.00--1.60
Total	285	11,701	2.44%		

2k.

Age Group	Children age < 6 years with BLL ≥ 4.5 in 2012	Total number of children age < 6 yrs with blood lead test in 2012	% of children with BLL ≥ 4.5	Odds Ratio	95% Confidence Interval
< 9 months	2	46	4.35%	2.24	0.54--9.39
9 mos -- 1.49 yrs	103	3,874	2.66%	1.35	1.02--1.79
1.5 -- 2.49 yrs	85	2,998	2.84%	1.44	1.07--1.94
2.5 -- 5.99 yrs	95	4,784	1.99%	ref.	
Total	285	11,702	2.44%		

2l. Among Girls

Age Group	Children age < 6 years with BLL ≥ 4.5 in 2012	Total number of children age < 6 yrs with blood lead test in 2012	% of children with BLL ≥ 4.5	Odds Ratio	95% Confidence Interval
< 9 months	2	20	10.00%	7.38	1.65--33.0
9 mos -- 1.49 yrs	50	1,841	2.72%	1.85	1.20--2.87
1.5 -- 2.49 yrs	36	1,488	2.42%	1.65	1.03--2.63
2.5 -- 5.99 yrs	35	2,359	1.48%	ref	
Total	123	5,708	2.15%		

2m. Among Boys

Age Group	Children age < 6 years with BLL ≥ 4.5 in 2012	Total number of children age < 6 yrs with blood lead test in 2012	% of children with BLL ≥ 4.5	Odds Ratio	95% Confidence Interval
< 9 months	0	26	0.00%	undefined	--
9 mos -- 1.49 yrs	53	2,032	2.61%	1.06	0.73--1.54
1.5 -- 2.49 yrs	49	1,510	3.25%	1.32	0.90--1.94
2.5 -- 5.99 yrs	60	2,425	2.47%	ref	
Total	162	5,993	2.70%		

Data is preliminary and subject to change

The relation of distance and direction from Exide site to risk of elevated blood lead levels among children < 6 years of age tested in 2012

Table 3a

Zone (distance of child's home at time of blood draw from Exide site)	EAST QUAD: Children age < 6 years with BLL ≥ 4.5 in 2012	Total number of children age < 6 yrs with blood lead test in 2012	% of children with BLL≥ 4.5	Odds Ratio	95% Confidence Interval	WEST QUAD: Children age < 6 years with BLL ≥ 4.5 in 2012	Total number of children age < 6 yrs with blood lead test in 2012	% of children with BLL≥ 4.5	Odds Ratio	95% Confidence Interval
1 (< 1.3 mi)	2	113	1.77%	0.92	0.21--4.12	10	331	3.02%	0.55	0.26--1.19
2 (1.3--1.69 mi)	4	145	2.76%	1.45	0.47--4.48	4	154	2.60%	0.47	0.16--1.40
3 (1.7--1.99 mi)	4	213	1.88%	0.98	0.32--3.01	7	277	2.53%	0.46	0.19--1.10
4 (2.0--2.99 mi)	17	834	2.04%	1.07	0.52--2.18	34	1,435	2.37%	0.43	0.25--0.75
5 (3.0--4.5 mi)	14	731	1.92%	ref		21	393	5.34%	ref	
Total	41	2,036	2.01%			76	2,590	2.93%		

Zone (distance of child's home at time of blood draw from Exide site)	NORTH QUAD: Children age < 6 years with BLL ≥ 4.5 in 2012	Total number of children age < 6 yrs with blood lead test in 2012	% of children with BLL≥ 4.5	Odds Ratio	95% Confidence Interval	SOUTH QUAD: Children age < 6 years with BLL ≥ 4.5 in 2012	Total number of children age < 6 yrs with blood lead test in 2012	% of children with BLL≥ 4.5	Odds Ratio	95% Confidence Interval
1 (< 1.3 mi)	17	340	5.00%	5.05	1.85--13.8	7	198	3.54%	2.44	1.01--5.92
2 (1.3--1.69 mi)	16	520	3.08%	3.05	1.11--8.38	5	243	2.06%	1.40	0.51-3.80
3 (1.7--1.99 mi)	11	461	2.39%	2.35	0.81--6.81	6	298	2.01%	1.37	0.54--3.47
4 (2.0--2.99 mi)	47	1,328	3.54%	3.52	1.39--8.91	31	1,711	1.81%	1.23	0.68--2.20
5 (3.0--4.5 mi)	5	480	1.04%	ref		18	1,215	1.48%	ref	
Total	96	3,129	3.07%			60	3,665	1.64%		

The relation of distance and direction from Exide site to risk of elevated blood lead levels among children < 6 years of age tested in 2012 Table 3b

Northwest (W - N) QUAD

Zone (distance of child's home at time of blood draw from Exide site)	Children age < 6 years with BLL ≥ 4.5 in 2012	Total number of children age < 6 yrs with blood lead test in 2012	% of children with BLL≥ 4.5	Odds Ratio	95% Confidence Interval
1 (< 1.3 mi)	6	130	4.62%	1.46	0.56--3.81
2 (1.3--1.69 mi)	9	278	3.24%	1.01	0.44--2.32
3 (1.7--1.99 mi)	8	319	2.51%	0.78	0.33--1.84
4 (2.0--2.99 mi)	16	461	3.47%	ref*	
5 (3.0--4.5 mi)	0	38	0.00%		
Total	39	1,226	3.18%		

* Aggregated zones 4+5 as ref

Northeast (N - E) QUAD

Zone (distance of child's home at time of blood draw from Exide site)	Children age < 6 years with BLL ≥ 4.5 in 2012	Total number of children age < 6 yrs with blood lead test in 2012	% of children with BLL≥ 4.5	Odds Ratio	95% Confidence Interval
1 (< 1.3 mi)	14	324	4.32%	2.78	1.29--5.98
2 (1.3--1.69 mi)	12	384	3.13%	1.99	0.90--4.39
3 (1.7--1.99 mi)	8	396	2.02%	1.27	0.52--3.09
4 (2.0--2.99 mi)	49	1,657	2.96%	1.88	1.01--3.48
5 (3.0--4.5 mi)	13	813	1.60%	ref	
Total	96	3,574	2.69%		

Southwest (S - W) QUAD

Zone (distance of child's home at time of blood draw from Exide site)	Children age < 6 years with BLL ≥ 4.5 in 2012	Total number of children age < 6 yrs with blood lead test in 2012	% of children with BLL≥ 4.5	Odds Ratio	95% Confidence Interval
1 (< 1.3 mi)	9	329	2.74%	0.54	0.24--1.20
2 (1.3--1.69 mi)	2	129	1.55%	0.30	0.07--1.31
3 (1.7--1.99 mi)	6	253	2.37%	0.47	0.19--1.17
4 (2.0--2.99 mi)	50	2,005	2.49%	0.49	0.29--0.83
5 (3.0--4.5 mi)	21	425	4.94%	ref	
Total	88	3,141	2.80%		

Southeast (E - S) QUAD

Zone (distance of child's home at time of blood draw from Exide site)	Children age < 6 years with BLL ≥ 4.5 in 2012	Total number of children age < 6 yrs with blood lead test in 2012	% of children with BLL≥ 4.5	Odds Ratio	95% Confidence Interval
1 (< 1.3 mi)	7	199	3.52%	2.32	0.98--5.45
2 (1.3--1.69 mi)	6	271	2.21%	1.44	0.58--3.55
3 (1.7--1.99 mi)	6	281	2.14%	1.39	0.56--3.42
4 (2.0--2.99 mi)	14	1,185	1.18%	0.76	0.39--1.47
5 (3.0--4.5 mi)	24	1,548	1.55%	ref	
Total	57	3,484	1.64%		

Data is preliminary and subject to change

Table 4
Logistic regression models

Outcome = BLL ≥ 4.5

Variables in model	*b*	Odds Ratio	95% Confidence Interval	*p* value
Univariate analyses				
Age				
< 9 months	0.81	2.24	0.54--9.39	0.27
9 mos -- 1.49 yrs	0.30	1.35	1.02--1.79	0.04
1.5 -- 2.49 yrs	0.36	1.44	1.07--1.94	0.02
2.5 -- 5.99 yrs	ref	ref		
Female	ref	ref		
Male	0.23	1.26	1.00--1.60	0.06
Zone				
Zone 1 (vs 5)	0.60	1.82	1.19--2.77	0.01
Zone 2 (vs 5)	0.29	1.34	0.85--2.10	0.21
Zone 3 (vs 5)	0.09	1.09	0.69--1.73	0.70
Zone 4 (vs 5)	0.17	1.19	0.87--1.63	0.28
Quadrant				
East (vs S)	0.09	1.10	0.75--1.63	0.62
North (vs S)	0.52	1.70	1.24--2.33	<0.01
West (vs S)	0.48	1.62	1.16--2.26	<0.01
Northeast (vs SE)	0.51	1.66	1.19--2.31	<0.01
Northwest (vs SE)	0.68	1.98	1.31--2.98	<0.01
Southwest (vs SE)	0.55	1.73	1.24--2.43	<0.01
Distance (in miles)	-0.17	0.84	0.72--0.98	0.03
Inverse of Distance squared (in miles)	0.45	1.57	1.05--2.35	0.03
Median year built (Census Tract)	-0.02	0.98	0.96--0.99	< 0.01
Controlling for distance and median year built simulaneously				
Distance (in miles)	-0.13	0.88	0.75--1.03	0.10
Median year built (Census Tract)	-0.02	0.98	0.97--0.99	< 0.01

Controlling for distance and quadrant simulaneously				
Models used 11,404 observations				
Distance (in miles)	-0.10	0.90	0.77--1.06	0.22
East (vs S)	0.10	1.11	0.75--1.64	0.62
North (vs S)	0.48	1.62	1.17--2.24	<0.01
West (vs S)	0.45	1.57	1.12--2.20	0.01
Distance (in miles)	-0.09	0.91	0.77--1.07	0.26
Northeast (vs SE)	0.47	1.60	1.15--2.24	0.01
Northwest (vs SE)	0.60	1.83	1.19--2.82	0.01
Southwest (vs SE)	0.51	1.67	1.19--2.36	<0.01
Controlling for zone and quadrant simulaneously				
Models used 11,425 observations				
Zone 1 (vs 5)	0.44	1.55	1.01--2.39	0.05
Zone 2 (vs 5)	0.14	1.16	0.73--1.83	0.54
Zone 3 (vs 5)	-0.04	0.97	0.61--1.53	0.88
Zone 4 (vs 5)	0.08	1.09	0.79--1.50	0.61
East (vs S)	0.10	1.11	0.75--1.64	0.61
North (vs S)	0.49	1.64	1.19--2.26	<0.01
West (vs S)	0.44	1.56	1.11--2.18	0.01
Zone 1 (vs 5)	0.41	1.51	0.98--2.33	0.06
Zone 2 (vs 5)	0.11	1.12	0.70--1.79	0.64
Zone 3 (vs 5)	-0.11	0.90	0.56--1.44	0.66
Zone 4 (vs 5)	0.00	0.92	0.67--1.27	1.00
Northeast (vs SE)	0.49	1.63	1.17--2.29	<0.01
Northwest (vs SE)	0.66	1.93	1.25--2.99	<0.01
Southwest (vs SE)	0.53	1.70	1.20--2.42	<0.01

Controlling for quadrant, distance and median year built simulaneously
Models used 11,425 observations

Models used 11,432 observations

Distance	-0.10	0.91	0.77--1.07	0.25
East (vs S)	0.01	1.01	0.68--1.52	0.95
North (vs S)	0.38	1.46	1.03--2.06	0.03
West (vs S)	0.34	1.41	0.98--2.02	0.09
Median year built	-0.01	0.99	0.97--1.00	0.06
Distance	-0.10	0.91	0.77--1.07	0.26
Northeast (vs SE)	0.36	1.43	0.99--2.05	0.05
Northwest (vs SE)	0.49	1.64	1.04--2.58	0.03
Southwest (vs SE)	0.41	1.50	1.04--2.17	0.03
Median year built	-0.01	0.99	0.97--1.00	0.14

Controlling for quadrant, distance, median year built, child's age group, and sex simulaneously

Distance (in miles	-0.09	0.88	0.78--1.08	0.29
East (vs S)	0.01	1.01	0.67--1.51	0.96
North (vs S)	0.36	1.44	1.02--2.03	0.04
West (vs S)	0.35	1.42	0.99--2.03	0.06
Median year built	-0.02	0.99	0.97--1.00	0.06
Age < 9 months (vs 2.5--5.99 yrs)	0.81	2.25	0.54--9.48	0.27
Age 9 mos -- 1.49 yrs (vs 2.5--5.99 yrs)	0.32	1.38	1.04--1.84	0.03
Age 1.5 -- 2.49 yrs (vs 2.5--5.99 yrs)	0.39	1.48	1.10--2.00	0.01
Male (vs Female)	0.21	1.24	0.97--1.57	0.08
Inverse of Distance squared (in miles)	0.32	1.38	0.91--2.09	0.14
East (vs S)	0.00	1.00	0.67--1.50	0.98
North (vs S)	0.36	1.43	1.01--2.03	0.04
West (vs S)	0.34	1.40	0.97--2.01	0.07
Median year built	-0.01	0.99	0.97--1.00	0.04
Age < 9 months (vs 2.5--5.99 yrs)	0.83	2.29	0.54--9.61	0.26
Age 9 mos -- 1.49 yrs (vs 2.5--5.99 yrs)	0.32	1.38	1.04--1.84	0.03
Age 1.5 -- 2.49 yrs (vs 2.5--5.99 yrs)	0.39	1.48	1.09--2.00	0.01
Male (vs Female)	0.21	1.23	0.97--1.57	0.08

Distance	-0.09	0.92	0.78--1.08	0.30
Northeast (vs SE)	0.35	1.42	0.99--2.04	0.06
Northwest (vs SE)	0.48	1.62	1.03--2.55	0.04
Southwest (vs SE)	0.42	1.52	1.05--2.19	0.03
Median year built	-0.01	0.99	0.97--1.00	0.15
Age < 9 months (vs 2.5--5.99 yrs)	0.81	2.24	0.53--9.40	0.27
Age 9 mos -- 1.49 yrs (vs 2.5--5.99 yrs)	0.33	1.39	1.05--1.86	0.02
Age 1.5 -- 2.49 yrs (vs 2.5--5.99 yrs)	0.40	1.49	1.10--2.02	0.01
Male (vs Female)	0.21	1.23	0.97--1.57	0.09
Controlling for quadrant, distance, proportion pre-1940 housing, child's age group and sex simulaneously				
Distance (in miles	-0.07	0.93	0.79--1.09	0.36
East (vs S)	0.06	1.07	0.71--1.59	0.76
North (vs S)	0.39	1.48	1.03--2.11	0.03
West (vs S)	0.39	1.48	1.04--2.11	0.03
20% - 29.9% pre-1940 housing (vs < 20%)	0.19	1.15	0.81--1.63	0.27
30 - 39.9% pre-1940 housing (vs < 20%)	0.25	1.22	0.87--1.72	0.14
> 40% pre-1940 housing (vs < 20%)	0.32	1.21	0.77--1.91	0.14
Age < 9 months (vs 2.5--5.99 yrs)	0.81	2.25	0.54--9.46	0.27
Age 9 mos -- 1.49 yrs (vs 2.5--5.99 yrs)	0.32	1.38	1.04--1.84	0.03
Age 1.5 -- 2.49 yrs (vs 2.5--5.99 yrs)	0.39	1.48	1.10--2.00	0.01
Male (vs Female)	0.21	1.23	0.97--1.57	0.08
Controlling for quadrant, distance, proportion pre-1950 housing, child's age group and sex simulaneously				
Distance (in miles	-0.07	0.93	0.79--1.09	0.40
East (vs S)	0.05	1.07	0.71--1.59	0.79
North (vs S)	0.38	1.48	1.03--2.11	0.05
West (vs S)	0.35	1.48	1.04--2.11	0.03
30% - 39.9% pre-1950 housing (vs < 30%)	0.26	1.15	0.81--1.63	0.30
40 - 59.9% pre-1950 housing (vs < 30%)	0.14	1.22	0.87--1.72	0.50
> 60% pre-1950 housing (vs < 30%)	0.26	1.21	0.77--1.91	0.35
Age < 9 months (vs 2.5--5.99 yrs)	0.80	2.25	0.54--9.46	0.27
Age 9 mos -- 1.49 yrs (vs 2.5--5.99 yrs)	0.33	1.38	1.04--1.84	0.03
Age 1.5 -- 2.49 yrs (vs 2.5--5.99 yrs)	0.39	1.48	1.10--2.00	0.01
Male (vs Female)	0.21	1.23	0.97--1.56	0.08

Controlling for quadrant, distance < 1 mile to Exide site, median age of housing, child's age group and sex simulaneously				
Distance < 1 mile	0.32	1.40	0.79--2.28	0.28
East (vs S)	0.00	1.01	0.67--1.51	0.98
North (vs S)	0.38	1.47	1.04--2.08	0.03
West (vs S)	0.35	1.42	0.99--2.04	0.06
Median year built	-0.02	0.99	0.97--1.00	0.04
Age < 9 months (vs 2.5--5.99 yrs)	0.82	2.26	0.54--9.51	0.27
Age 9 mos -- 1.49 yrs (vs 2.5--5.99 yrs)	0.33	1.39	1.04--1.85	0.03
Age 1.5 -- 2.49 yrs (vs 2.5--5.99 yrs)	0.40	1.48	1.10--2.01	0.01
Male (vs Female)	0.21	1.24	0.97--1.57	0.08

Controlling for quadrant, distance < 1 mile to Exide site, median age of housing, child's age group and sex simulaneously				
Distance < 1 mile	0.36	1.44	0.81--2.54	0.21
Northeast (vs SE)	0.37	1.45	1.01--2.08	0.05
Northwest (vs SE)	0.55	1.73	1.11--2.68	0.02
Southwest (vs SE)	0.43	1.54	1.06--2.21	0.02
Median year built	-0.01	0.99	0.97--1.00	0.14
Age < 9 months (vs 2.5--5.99 yrs)	0.81	2.24	0.53--9.41	0.27
Age 9 mos -- 1.49 yrs (vs 2.5--5.99 yrs)	0.33	1.39	1.05--1.86	0.02
Age 1.5 -- 2.49 yrs (vs 2.5--5.99 yrs)	0.40	1.49	1.10--2.02	0.01
Male (vs Female)	0.21	1.23	0.97--1.56	0.09

Table 5
Case Control substudy using actual age of home

Using Los Angeles County Tax Assessor's records we recorded the actual age of housing for 270 cases (with BLLs >= 4.5) and 290 controls.

	Cases	Controls	
Year of construction (mean)	1937	1943	p-value for t-test of equal means < 0.01
Year of construction (median)	1930	1941	
Year Built Range	1885--2008	1903--2012	
Mean distance from Exide (in miles)	2.36	2.45	p-value for t-test of equal means = 0.17
Median distance from Exide (in miles)	2.45	2.60	
Distance from Exide (in miles)--Range	0.84--4.22	0.82--4.39	

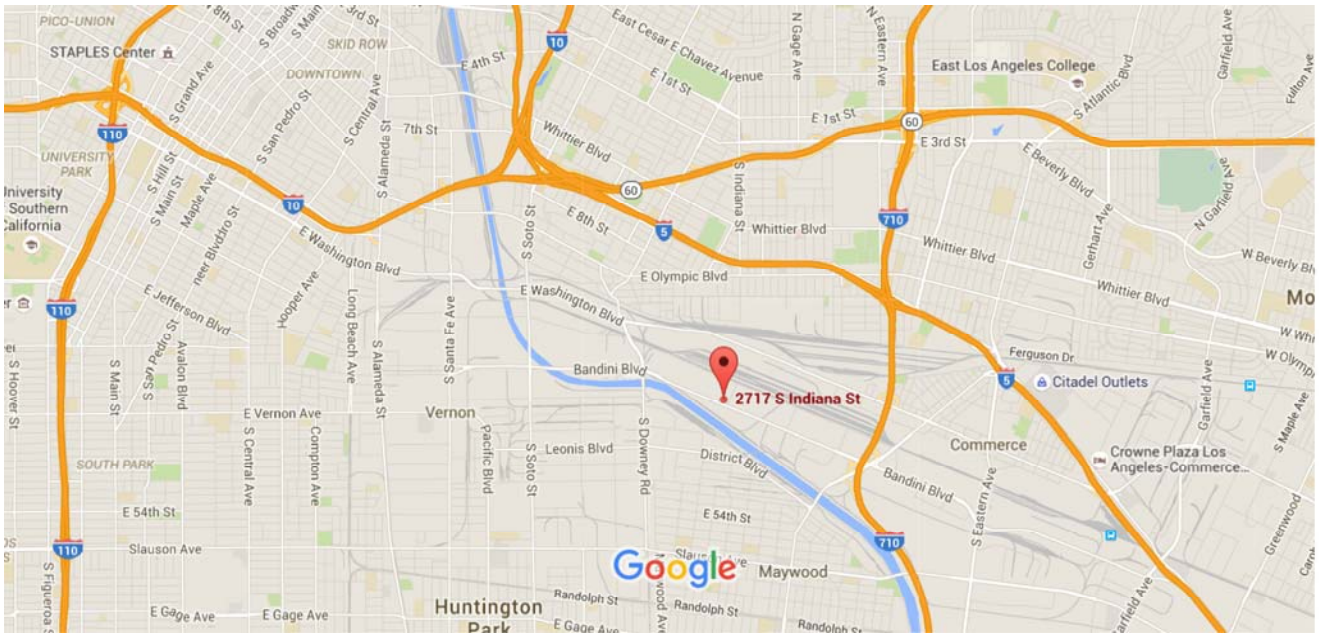
Outcome = BLL ≥ 4.5

Variables in model	***b***	**Odds Ratio**	**95% Confidence Interval**	***p* value**
Distance (in miles)	-0.15	0.86	0.70--1.07	0.17
Inverse of Distance squared	0.30	1.35	0.74--2.45	0.32
Distance < 1 mile from Exide	0.05	1.05	0.48--2.31	0.89
Median year built (Tract)	-0.02	0.98	0.96--0.99	<0.01
Actual year of construction	-0.01	0.99	0.98--1.00	<0.01
Home built prior to 1925 (vs 1925+)	0.80	2.22	1.55--3.17	<0.01
Home built prior to 1979 (vs 1979 +)	0.24	1.27	0.65--2.49	0.49
Home built prior to 1925 (vs 1979+)	0.83	2.31	1.13--4.75	0.03
Home built 1925 -1949 (vs 1979+)	-0.07	0.93	0.46--1.88	0.84
Home built 1950 -1978 (vs 1979+)	-0.01	0.99	0.48--2.07	0.98
Controlling for distance and actual year built simultaneously				
Distance (in miles)	-0.10	0.91	0.73--1.12	0.36
Actual year of construction	-0.01	0.99	0.98--1.00	<0.01

Controlling for distance and quadrant simultaneously				
Distance	-0.10	0.90	0.77--1.0	0.22
East (vs S)	0.10	1.11	0.75--1.64	0.62
North (vs S)	0.48	1.62	1.17--2.24	<0.01
West (vs S)	0.45	1.57	1.12--2.20	0.01
Distance	-0.05	0.95	0.76--1.19	0.66
Northeast (vs SE)	0.65	1.91	1.21--3.00	0.01
Northwest (vs SE)	0.80	2.22	1.20--4.11	0.01
Southwest (vs SE)	0.35	1.42	0.91--2.22	0.12
Controlling for distance, quadrant and actual year built simultaneously				
Distance	-0.03	0.97	0.77--1.21	0.77
East (vs S)	0.07	1.07	0.64--1.79	0.80
North (vs S)	0.60	1.82	1.15--2.89	0.01
West (vs S)	0.25	1.28	0.81--2.02	0.28
Actual year built	-0.01	0.99	0.98--1.00	0.01
Distance	-0.04	0.97	0.77--1.21	0.76
Northeast (vs SE)	0.55	1.73	1.09--2.75	0.02
Northwest (vs SE)	0.60	1.82	0.96--3.44	0.06
Southwest (vs SE)	0.25	1.29	0.82--2.03	0.27
Actual year built	-0.01	0.99	0.98--1.00	0.01

Controlling for distance, quadrant and home built pre-1925 simultaneously				
Distance	-0.02	0.98	0.79--1.23	0.88
East (vs S)	0.13	1.15	0.68--1.93	0.60
North (vs S)	0.53	1.70	1.06--2.71	0.03
West (vs S)	0.30	1.35	0.86--2.13	0.19
Home built pre-1925	0.68	1.97	1.35--2.88	<0.01
Distance	-0.02	0.98	0.79--1.23	0.89
Northeast (vs SE)	0.51	1.67	1.05--2.66	0.03
Northwest (vs SE)	0.49	1.64	0.86--3.12	0.13
Southwest (vs SE)	0.23	1.26	0.80--1.99	0.32
Home built pre-1925	0.69	2.00	1.37--2.91	<0.01

Google Maps 2717 S Indiana St



Map data ©2016 Google 1 mi

Google Maps

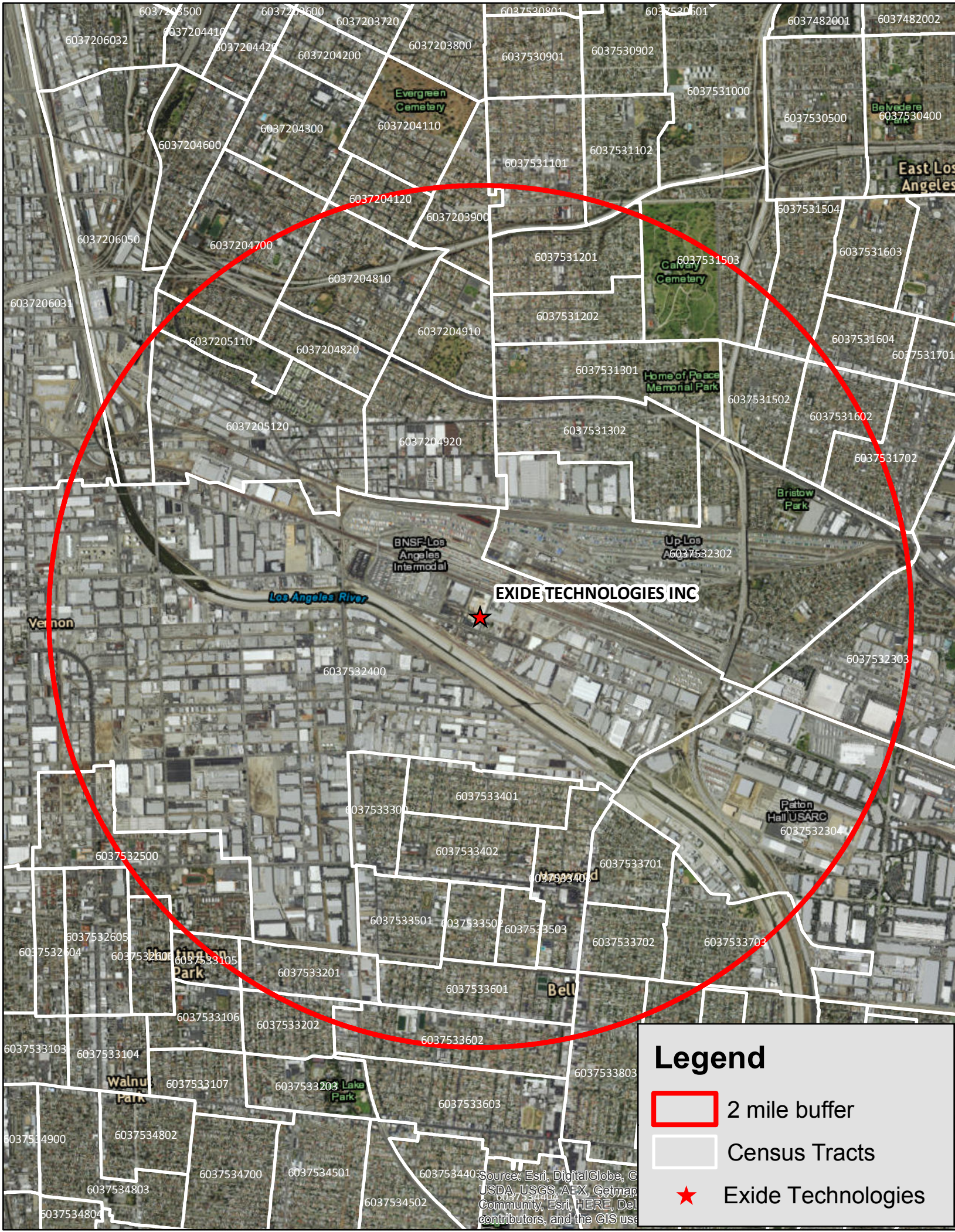

EXIDE TECHNOLOGIES INC
Los Angeles River
Vernon
Evergreen Cemetery
Calvary Cemetery
Home of Peace Memorial Park
Bristow Park
BNSF-Los Angeles Intermodal
Up-Los Angeles
Patton Hall USARC
Walnut Park
Legend
2 mile buffer
Census Tracts
Exide Technologies

EXHIBIT E

SheppardMullin

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650.815.2600 main
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650.815.2605 direct
jchadwick@sheppardmullin.com

February 29, 2016

VIA E-MAIL AND FEDEX

Mr. Richard Votava
Chief, Operation Support Section
Childhood Lead Poisoning Prevention Branch
California Department of Public Health
850 Marina Bay Pkwy, Bldg. P, 3d Floor
Richmond, CA 94804
E-Mail: Richard.Votava@cdph.ca.gov

Re: Public Records Act Request Regarding Blood Lead Data

Dear Mt. Votava:

I am writing to follow up on our telephone conference of February 17, 2016, and your letter of December 21, 2015, regarding our request for public records of the results of blood lead level testing.

By way of background, on November 24, 2015, we wrote to the California Department of Public Health (CDPH) requesting, pursuant to the provisions of the Public Records Act and Article I, section 3(b) of the California Constitution, records generated or received pursuant to the California State Childhood Lead Poisoning Prevention Act and/or Health & Safety Code Section 124130 with respect to individuals in Los Angeles County from January 1, 2007 to the present. In particular, we requested, with respect to each individual in Los Angeles County whose blood lead level has been tested from 2007 to the present, the following information:

- Any unique identification numbers or codes assigned to subjects of testing (including any unique identifier(s) that are or can be used to determine if a subject was tested more than once within a year), but not including any potentially public identification numbers or codes utilized for purposes, such as Social Security Number or Driver's License Number;

- Blood lead level (ug/dL);

- Blood lead level detection limit;

- Date that blood lead was sampled;

- Age of person tested;
- City in which the individual tested resides;
- Zip code in which the individual tested resides;
- Collection method (capillary, venous, etc.); and
- Whether the blood lead concentration triggered an investigation, and the conclusion of that investigation (including, any conclusion or data as to the source of the lead).

We also asked for records of the respect to the age of the homes in which the persons tested reside. The request noted that if those records are included in tables containing blood lead level testing information, it should be maintained and provided along with the other data included in these tables, and that if it is not included in those tables, it should be provided together with a unique, non-public identifier that can be used to correlate it with the data included in the tables, to the extent possible.

In requesting this information, we made it clear that the information should be de-identified, i.e. that individual patient names, addresses, telephone numbers, names of parents, guardians, relatives, or physicians, potentially public identifiers such as Social Security Numbers or Driver's License Numbers, and any other information that uniquely identifies any individual should be redacted. We also asked that the foregoing records be provided in Excel or Access format, or in the most accessible electronic format otherwise reasonably available.

Attached hereto is a copy of a table showing the information we requested. We discussed this table in the course of our conversation with you and the other representatives of the Department of Public Health. Based on our telephone conference and your correspondence of December 21, 2015, it is our understanding that you have all categories of information requested for all years as to which it was requested.

We understand that the records may not be perfect. In other words, for certain observations (individuals), some data that is normally collected and received by the Department may be missing. In addition, we understand that between 2007 and 2009, blood lead testing information on individuals up to 21 years of age was incorporated into the Department's RASSCLE 2 database and blood lead testing information on individuals 21 or older was incorporated in the Department's ELVIS II database, whereas from 2009 on blood lead testing information on individuals of all ages was incorporated into the RASSCLE 2 database.

Acknowledging this, the following is our understanding with respect to availability of the categories of records requested:

- <u>Individual Blood Lead Level</u>: This information is available. Some individuals may have been tested more than once, and therefore may be associated with more than one result. If possible, in such circumstances, we would request either the first test result or the highest test result. However, if this requires significant effort, we would accept the

records with all test results. We understand that if all test results are provided, it will be possible to determine that there are multiple test results for a particular individual. Please let us know if you have concerns about providing only the first or only the highest result for all individuals with multiple test results, and please let us know whether our understanding of records including multiple test results is accurate.

- Detection (or Reporting) Limit: You indicated that your records do not include information specifically defining the detection limit of the blood lead level test administered. Instead, your records include information indicating whether the blood lead level was below or above a certain threshold (with the threshold being set by the test provider). For example, you indicated that the report from the test provider might indicate that the result was "less than 3 µg/dL." You described this as the "Reporting Limit." You indicated that information could be provided, and we agreed to accept that information as "Detection Limit" information.

- Date Blood Sample/Tested: You indicated that you have information with respect to the date blood was drawn in "the high 90% of cases." You indicated that in "99 percent of cases" you have either the date blood was drawn or the date blood was tested. The data dictionaries for the RASSCLE 2 database indicate that you generally collect both the date the blood sample was drawn and the date it was analyzed. We request that both fields be provided, to the extent available.

- Age: Our request originally sought the age of individuals tested in bands (<6, 6-21, >21), because we believed this was how age information was collected and retained. You indicated that age information is not collected or retained in this manner. You indicated that you collect and can provide date of birth (DOB) information. However, for we do not require precise DOB information, and in order to ensure the privacy of individuals whose test results are included in the requested records, we would prefer not to receive precise DOB information. The data dictionaries for the RASSCLE 2 database and other public information describing the Department's records indicate that the database includes and that you can provide age at the time the blood sample was drawn. We request that you include that information instead of DOB. Alternatively, it appears that you can provide year of birth. If age at the time of draw cannot, for some reason, be provided, we request that you provide year of birth only. Please confirm that you can provide either age at the time of draw or year of birth without undue effort.

- City: You indicated that your records include and that you can provide information as to the city in which the tested individual resided at the time of testing.

- Zip Code: You indicated that your records include and that you can provide information as to the Zip code in which the tested individual resided at the time of testing. (You expressed a concern that privacy rights might in some cases be implicated by the disclosure of this information. That concern is addressed below.)

- Age of Building: You indicate that you collect information as to the age of building in which the tested individual resides only in cases that result in a follow up investigation.

We understand that the Department does not collect or retain this information with respect to all tested individuals. However, we understand that this information is contained in the RASSCLE 2 database in connection with those individuals whose blood lead levels trigger an investigation (unless, for some reason, it is not reported by the investigating agency). This information should be provided to the extent it is available.

- Collection Method: This refers to whether the blood sample was collected by venous, capillary, or other method. You indicated that in nearly all cases you receive this information, and that in cases in which you do not the database will indicate that the method is "unknown." You indicated that this information could be provided.

- Whether Blood Lead Level Triggered Investigation and Conclusion as to Source: You indicated that the RASSCLE 2 database includes a field with a Yes/No value indicating whether an investigation was triggered. You also indicated that if an investigation is conducted, the results of the investigation are reported to the Department and certain information from the investigation report is included in the RASSCLE 2 database. We understand that information from the investigation is recorded on a Lead Poisoning Follow-Up Form promulgated by the Childhood Lead Poisoning Prevention Branch. That Report form includes a field for "Probable Exposures," which asks the investigator to provide the following information: "In your judgment, what are the most probable sources of lead poisoning in this case?" It also includes, in Appendix A, fields identifying in bands when the housing unit involved was built (pre-1920, 1920-1939, 1940-1949, 1950-1959, 1960-1979, 1990+, and Pre-1978), whether the site is "close to a lead industry," and a "summary of sources of exposure identified." To the extent this information is included in the Department's databases, it should be provided.

- Some/All Data Missing? You explained that whether particular categories of information are missing from the records of tested individuals would be apparent from the records provided, and we agreed that the Department is not required to separately specify whether information is missing.

- Unique Identifiers: We understand that the Department applies a unique identifier to the records of each tested individual, which is arbitrary and does not reflect any actual identifying information about the individual. We did not discuss this in our meeting, but the records provided should include this information, unless doing so would create undue burden or raise privacy concerns.

We hope that this description is consistent with your understanding of the outcome of our telephone conference. If this does not accurately describe the circumstances or the nature of our discussion, please let us know and please correct any inaccuracies.

We discussed the concern you expressed that the disclosure of certain information could lead to the re-identification of individuals, even though no information directly identifying individuals will be included in the records provided in response to our request. Based on prior releases of information by the Department to various entities, it is clear that you are well-versed in the methods for preventing re-identification. We discussed using the approach of k-anonymity,

which is a traditional approach for ensuring robust protection against re-identification. Under this approach, data regarding individual subjects is redacted or suppressed in such a manner that no less than a pre-determined number of individuals in the dataset share a particular set of characteristics (*i.e.*, have the same value for publically-knowable items of information contained in the dataset). We propose that k-anonymization be applied to the records provided in response to our request, and that a K of 10 be employed. This is consistent with standards often employed in the release of health related information, for example in the release of prescription information by the Centers for Medicare and Medicaid Services (see https://questions.cms.gov/faq.php?id=5005&faqId=9846). As we discussed, we proposed that adjacent Zip codes and/or cities be combined to ensure that there are at least ten individuals sharing any set of publically-knowable variables. With respect to the data requested, we consider the publically-knowable variables to be City and Zip Code. While building age might be publically knowable in some circumstances, because housing age information is apparently collected and retained by the Department in bands, the data provided in response to these requests is not sufficient to identify a particular home. However, if you believe that the disclosure of information regarding the age of homes is potentially problematic, we are willing to discuss and hopefully find a way to address your concerns.

We also discussed our desire to avoid imposing too much of a burden on the Department. It is our objective to minimize the burden of these requests. It appears to us, based on the information you have provided, that the Department regularly creates reports from information contained in the RASSCLE and/or ELVIS databases that contain most, if not all, of the information we have requested. In particular, it appears that the Department produces period data CD's for internal purposes and/or provision to other agencies (the "RASCCLE 2 Periodic Data CDs"), as well as bi-weekly reports created for the same purposes (RASSCLE Bi-Weekly Reports"). The RASCCLE 2 Periodic Data CDs contain most of the information we have requested. Together with the Bi-Weekly reports they appear to provide nearly all of the information requested, except for information obtained from reports of investigations. If these reports include data for the period from 2007 to the present, they might provide most or all of the information requested.

In addition, it is our understanding that the Department has previously created and provided a copy of a dataset that includes blood lead testing information from January 1, 1992 to April 4, 2012, including all blood lead tests entered into the RASSCLE database, along with the address, gender, race, and year of birth of the individual receiving the blood lead test, as well as related home age information. It is not clear to us what blood lead testing data is included in this dataset, but it may include the categories of information we have requested. If so, it is possible that all that would be required would be the supplementation of this existing dataset for the period of April 4, 2012 to the end of 2015.

As should be apparent, we are trying to find ways to minimize the burden of providing the requested information. We obviously need your assistance in doing so. If these or other existing reports or datasets can be provided instead of having to produce a new dataset, it would be in the best interests of everyone involved. We request that you clarify the information included in and the time period covered by these existing records, and that you identify any other existing records that might individually or in combination meet the requirements of our

request. We are willing to discuss modifications to the records we seek if most of the requested information can be expeditiously provided through the disclosure of existing records.

We also hope to reduce the burden on the Department by clarifying that we do not require the combination of information from the ELVIS II and RASCCLE 2 databases. As long as those databases can be de-duplicated or contain unique identifiers that permit the identification of overlapping subjects, we would be willing to receive the information from the two databases separately. In fact, if the non-duplicative information in the ELVIS II database for the period of 2007 to 2009 is minimal or very limited, it may not be necessary for the Department to provide information from the ELVIS II database at all.

As also discussed, while we do not agree that our requests necessitate data compilation, extraction, or programming (rather than merely redaction or suppression of data), Exide is willing to consider paying for the reasonable costs of providing the requested information. In order to determine whether it is willing to do so, however, it needs to know what amount the Department would charge for providing the requested information. We therefore request that you provide us with an estimate of the costs for doing so, including information as to the amount of time required and how the attendant costs are calculated.

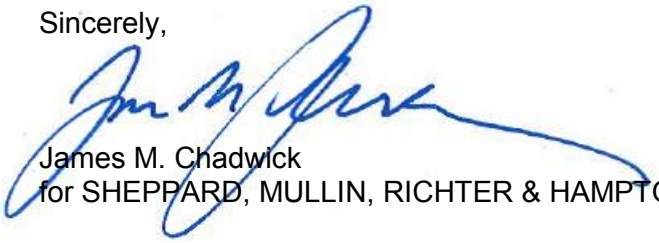
There are two additional points we need to address.

As you know, Exide Technologies has been funding blood lead level testing in a defined area around a facility located in Vernon, California. In particular, testing has been conducted pursuant to the blood lead testing program described in Paragraph 5.25 of Stipulation and Order, Docket HWCA: P3-12/13/010, OAH No. 2013050540, and the blood lead level monitoring program described in Paragraph 13 of the March 11, 2015 Non-Prosecution Agreement with Exide Technologies. Copies of these documents are attached. It is our understanding that results of all blood lead testing conducted in California must be reported to the Department. We therefore assume that the data generated from the Exide-funded testing is included in the RASSCLE 2 database. However, we would appreciate your confirmation. In addition, if this information has been provided to the Department separately, we request that the records of this testing be provided along with the other information requested.

Finally, during the course of our telephone conference, you indicated that you are preparing for public release data obtained from blood lead testing in the census tracts within a two to three mile radius of the Exide Vernon site. You indicated that this information would be made public shortly, probably within a few weeks. We request your assurance that this information will not be disclosed in a discriminatory manner, and that we will be provided with this information at the same time that is provided to others. Please confirm that you will do so.

Thank you for your cooperation and assistance. We look forward to resolving these matters promptly. Please feel free to contact me if you have questions.

Sincerely,



James M. Chadwick
for SHEPPARD, MULLIN, RICHTER & HAMPTON LLP

Attachments

SMRH:475088123.1

EXHIBIT F

From: James Chadwick
Sent: Monday, March 07, 2016 5:13 PM
To: 'melanie.neumeyer@cdph.ca.gov'
Subject: Request for Public Records

Dear Ms. Neumeyer:

I am calling to follow up on my telephone message to you earlier today. As you know, I represent Exide Technologies in connection with a request for records of blood lead level testing results. Based on the telephone conference on February 17, I understand that the Childhood Lead Poisoning Prevention Branch (CLPPB) has agreed to provide the request records in de-identified form. In my correspondence to CLPPB on February 29, 2016, I addressed a few points on which CLPPB requested clarification. It is my understanding that all that is required at this point is an estimate of the costs of providing the records and then, if there is agreement on that point, we can proceed with the delivery of the requested records.

I spoke to Valarie Charlton a little while ago. I asked when the CLPPB would respond to my most recent correspondence. She said that the best should could tell me is that they hope to get back to me sometime next week. She was not willing to commit even to that.

It's now been more than three months since we originally requested records. I understand that everyone has many demands on their time, but it is clear that CLPPB knows exactly how to redact and produce a data set such as that we have requested (having done so before), and indeed it appears that much of the information we have requested has already been assembled. At this point I do not see any justification for further delay, and I hope you will see to it that we receive an estimate promptly and that the records are promptly made available.

Please contact me at your earliest convenience to discuss this matter. Thank you.

James Chadwick

650.815.2605 | direct
jchadwick@sheppardmullin.com | Bio

SheppardMullin
Sheppard Mullin Richter & Hampton LLP
379 Lytton Avenue
Palo Alto, CA 94301-1479
650.815.2600 | main
www.sheppardmullin.com

EXHIBIT G

From: James Chadwick
Sent: Tuesday, March 08, 2016 6:11 PM
To: 'melanie.neumeyer@cdph.ca.gov'
Subject: RE: Request for Public Records

Dear Ms. Neumeyer:

If you intend to get back to me, please let me know when you will. If you do not intend to respond, please let me know and I will stop following up and proceed accordingly.

From: James Chadwick
Sent: Monday, March 07, 2016 5:13 PM
To: 'melanie.neumeyer@cdph.ca.gov'
Subject: Request for Public Records

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650.815.2605 | direct
jchadwick@sheppardmullin.com | Bio

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Palo Alto, CA 94301-1479
650.815.2600 | main
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EXHIBIT H

From: Neumeyer, Melanie (CDPH-EXEC-OLS) [mailto:Melanie.Neumeyer@cdph.ca.gov]
Sent: Wednesday, March 09, 2016 8:29 AM
To: James Chadwick
Subject: RE: Request for Public Records

Yes, full response is forthcoming. Thanks,

Melanie Neumeyer
Attorney
California Department of Public Health
Office of Legal Services
1415 L Street, Suite 500, Sacramento, CA 95814
(916) 440-7356

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From: James Chadwick [mailto:jchadwick@sheppardmullin.com]
Sent: Tuesday, March 08, 2016 6:11 PM
To: Neumeyer, Melanie (CDPH-EXEC-OLS)
Subject: RE: Request for Public Records

Dear Ms. Neumeyer:

If you intend to get back to me, please let me know when you will. If you do not intend to respond, please let me know and I will stop following up and proceed accordingly.

From: James Chadwick
Sent: Monday, March 07, 2016 5:13 PM
To: 'melanie.neumeyer@cdph.ca.gov'
Subject: Request for Public Records

Dear Ms. Neumeyer:

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I spoke to Valarie Charlton a little while ago. I asked when the CLPPB would respond to my most recent correspondence. She said that the best should could tell me is that they hope to get back to me sometime next week. She was not willing to commit even to that.

It's now been more than three months since we originally requested records. I understand that everyone has many demands on their time, but it is clear that CLPPB knows exactly how to redact and produce a data set such as that we have requested (having done so before), and indeed it appears that much of the information we have requested has already been assembled. At this point I do not see any justification for further delay, and I hope you will see to it that we receive an estimate promptly and that the records are promptly made available.

Please contact me at your earliest convenience to discuss this matter. Thank you.

James Chadwick

650.815.2605 | direct
jchadwick@sheppardmullin.com | Bio

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379 Lytton Avenue
Palo Alto, CA 94301-1479
650.815.2600 | main
www.sheppardmullin.com

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EXHIBIT I

From: Neumeyer, Melanie (CDPH-EXEC-OLS) [mailto:Melanie.Neumeyer@cdph.ca.gov]
Sent: Wednesday, March 30, 2016 4:54 PM
To: James Chadwick
Subject: CDPH lead data

James,

I want to clarify where we are in this response to your Public Records Act (PRA) request, so there is no misunderstanding.

CDPH received your PRA request on November 24, 2015, and sent responsive documents to you on December 21, 2015. Your PRA request also asked for data that is not contained in an existing document. Accordingly, that request is not for an existing record, and so that is not a PRA request.

Although it is not required to create a new record, CDPH will evaluate its ability to fulfill this request taking into account available resources for creating the record. CDPH has been working with you to see if we might accommodate your request to create a custom document by doing a custom data extraction. That is why we have been asking you to clarify what data you want, after we first explained to you what data existed (and what does not), and what data might be subject to confidentiality restrictions and could not be produced. On the conference call on February 17th our epidemiologists clarified what data the Childhood Lead Poisoning Prevention (CLPP) Branch has and where the concerns for confidentiality exist. CLPP is currently reviewing your most recent letter from February 29, 2016, to determine if CDPH has the resources to comply with this request as written and whether the data can be released in a confidential format.

Although CDPH is under no legal obligation to create this record, we expect to get back to you shortly to let you know. If CDPH is able to create this record, we will let you know the estimated time and cost that you would be required to pay.

Please direct all future communications to me, as counsel for CDPH, as I will serve as your primary contact for these requests going forward.

Best,

Melanie Neumeyer
Attorney
California Department of Public Health
Office of Legal Services
1415 L Street, Suite 500, Sacramento, CA 95814
(916) 440-7356

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Save Our Water

Learn easy ways to save water during California's drought at SaveOurWater.com

EXHIBIT J

From: James Chadwick [mailto:jchadwick@sheppardmullin.com]
Sent: Friday, April 01, 2016 3:31 PM
To: Neumeyer, Melanie (CDPH-EXEC-OLS)
Subject: RE: CDPH lead data

Dear Ms. Neumeyer:

From your message below, we understand the California Department of Public Health (CDPH) takes the position that it has no obligation to respond to our request. The suggestion that, despite the fact that it has no obligation to do so, CDPH may consider our request and may someday provide whatever information it decides to disclose on whatever terms it may impose, does not accord with the obligations imposed on CDPH by California law. As explained below, CDPH has a clear and present duty to provide the requested records. Given that you reject that duty, we have no choice but to treat your response as a denial.

First, you assert that our November 24, 2015 request, which was made pursuant to Article I, Section 3(b) of the California Constitution and the California Public Records Act (PRA), "asked for data that is not contained in an existing document," and that "[a]ccordingly, that request is not for an existing record, and so that is not a PRA request."

That assertion is clearly contrary to the law and the facts. As CDPH representatives informed us during our conference call on February 17, 2016, nearly all of the records we have requested are contained in a single database: the RASSCLE II database created and maintained by the Childhood Lead Poisoning Prevention Branch of CDPH (CLPPB). To the extent the records we have requested are not contained in RASSCLE II, they are contained in the RASSCLE I and/or ELVIS II databases.

As you are presumably aware, the provisions of the PRA create a presumptive right of public access to all "public records." Gov't Code § 6253(a). Under the PRA, "public records" include "any writing containing information relating to the conduct of the public's business prepared, owned, used, or retained by any state or local agency ***regardless of physical form or characteristics***." Gov't Code § 6252(e) (emphasis added). Similarly, "writings" are defined as "any handwriting, typewriting, printing, photostating, photographing, photocopying, transmitting by electronic mail or facsimile, and every other means of recording upon any tangible thing any form of communication or representation, including letters, words, pictures, sounds, or symbols, or combinations thereof, and any record thereby created, regardless of the manner in which the record has been stored." Gov't Code § 6252(g). Electronic records, including records consisting of or contained in electronic databases, are clearly embraced by

these definitions. The PRA expressly provides that "[u]nless otherwise prohibited by law, any agency that has information that constitutes an identifiable public record not exempt from disclosure pursuant to this chapter that is in an electronic format shall make that information available in an electronic format when requested by any person . . . ." Gov't Code § 6253.9(a). It is beyond dispute that records relating to the health of California citizens and the measures taken to monitor and protect their health relate to "the conduct of the public's business." (See. e.g., *San Gabriel Tribune v. Superior Court* (1983) 143 Cal.App.3d 762, 774 [holding that "only purely personal information unrelated to 'the conduct of the public's business' . . . i.e., the shopping list phoned from home, the letter to a public officer from a friend which is totally void of reference to governmental activities" falls outside the definition of "records" subject to the Public Records Act.].) Thus, the RASSCLE II, RASSCLE I and ELVIS II databases are all indisputably "public records" for the purposes of the PRA, and your assertion that they are not is insupportable.

To the extent that you claim that because we seek the requested records in de-identified form we are asking CDPH to create a record that does not exist, you are wrong. Recognizing—as we have from the outset—that disclosure of identifying information would unnecessarily implicate the privacy interests of those who have been the subject of the testing of which we seek records, we have asked that identifying information be redacted and that the remaining information be provided. As you know, the PRA requires that any "reasonably segregable portion of a record shall be available for inspection by any person requesting the record after deletion of the portions that are exempted by law." Gov't Code § 6253(a). Thus, CDPH has a clear legal duty to provide the information we have requested after the redaction of identifying information. Doing so does not in any way entail the creation of a new record, and the need to segregate and provide disclosable information is not in any way a barrier to our requests.

I note that while we have requested only certain records contained in the CDPH databases, and not <u>all</u> reasonably segregable and nonexempt information, we are willing to accept the databases without any redactions except those necessary to protect the privacy of testing subjects, if CDPH prefers to proceed in that manner. In addition, as we explained during the February 17 telephone conference and in our follow-up request of February 29, 2016, while having all of the requested records incorporated into a single file would be ideal, we are willing to receive information from the separate databases separately.

I also note that your recent correspondence does not acknowledge the fact that CDPH has previously created and provided a record that includes blood lead testing

information from January 1, 1992 to April 4, 2012, including all blood lead tests entered into the RASSCLE database, along with the address, gender, race, and year of birth of the individual receiving the blood lead test, as well as related home age information. We do not presently know what blood lead testing data is included in this record, but it may include all of the categories of information we have requested. If so, nearly all of the records we have requested have already been compiled into a pre-existing record. Even if not, most of the records we have requested are apparently contained in this pre-existing record.

This is only one example of CDPH's creation and provision of datasets containing the records we have requested. As CDPH has publically proclaimed: "The State CLPPB provides data to local CLPP Programs and the public . . . ." Indeed, CDPH makes de-identified information regarding blood lead level testing results available to the public through its website: http://cehtp.org/page/lead/query. (By this correspondence, we are making an additional request for public records. Specifically, pursuant to Article I, Section 3(b) of the California Constitution and the PRA, we request all de-identified collections of records or datasets that CDPH has provided to any member of the public, and all correspondence and other documents describing such collections or datasets.)

Thus, it is apparent that the CDPH can and does routinely and readily produce de-identified records from its databases. It clearly has the capability of doing so without engaging in any exceptional effort, and without undertaking any data compilation, extraction, or programming. Thus, the records we have requested are required by law to be provided without the imposition of any charges beyond "the direct cost of producing a copy of a record in an electronic format." Gov't Code § 6253.9(a)(2). Nonetheless, in order to expedite matters, Exide has offered to pay for any incremental costs incurred in provide the records it has requested, if it deems those costs to be reasonable. (That offer stands.)

We understand that you are nevertheless denying our request for records pursuant to Article I, Section 3(b) of the California Constitution and the California Public Records Act. Your response to our original November 24, 2015 request asserted that CDPH "do[es] not have existing records with the information requested." You did not formally respond to our follow-up request of February 29, 2016, as required by law. Gov't Code § 6253(c). To the extent your recent message is intended to constitute a response to that follow-up request, it does not comply with either the timing or the content mandated by the PRA. In addition, the PRA requires that "[w]hen the agency dispatches the determination, and if the agency determines that the request seeks disclosable public records, the agency shall state the estimated date and time when the records will

be made available." Gov't Code § 6253(c). You have steadfastly refused to specify any date or time when the records we have requested would be made available.

Most significantly, despite the clear obligation of CDPH to provide the records we have requested, you have taken the position that CDPH has no duty to provide them. As noted, you assert that our request is "not a PRA request." Implicitly, you take the position that CDPH is not subject to any obligations under the PRA with respect to our request. Thus, while you have indicated that CDPH may still, someday, consider our request and decide whether to provide the requested records, you take the position that our request is improper and that CDPH has no duty to respond. Thus, we understand that you are denying our request and rejecting our assertion that the records we have requested are required to be made public under the PRA and the California Constitution.

Furthermore, it appears that CDPH has recently created and disclosed a dataset that includes blood lead level testing information for the area proximate to the Exide facility in the City of Vernon, California. Despite the fact that our February 29, 2016 follow-up request expressly sought this record, and asked that it be provided as soon as possible, you have not even acknowledged our original request for this record, and you have ignored my telephone calls and emails following up on the request for this record. Thus, we understand that you have rejected our request for this information as well.

We will proceed accordingly.

James Chadwick

650.815.2605 | direct
jchadwick@sheppardmullin.com | Bio

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EXHIBIT K

From: Neumeyer, Melanie (CDPH-EXEC-OLS) [mailto:Melanie.Neumeyer@cdph.ca.gov]
Sent: Friday, April 08, 2016 2:40 PM
To: James Chadwick
Subject: RE: CDPH lead data

Dear Mr. Chadwick,

CDPH received your correspondence on April 1, 2016 following up on your previous Public Records Act inquiry and making a new request for, "all de-identified collection of records or datasets that CDPH has provided to any member of the public, and all correspondence and other documents describing such collections or datasets."

Please find attached the Census Tract level data for children surrounding the Exide facility. This document was finalized earlier today with DTSC. You can find all the relevant Exide information here http://www.dtsc.ca.gov/HazardousWaste/Projects/upload/An-Analysis-of-Children-s-Blood-Lead-Levels-in-the-Area-Around-the-Exide-Site.pdf.
This document concludes the available records the Childhood Lead Poisoning Prevention Program (CLPPP) has for your initial PRA request. CLPPP is however, still assessing whether it has the available resources to provide you with the data extraction you requested if it can be done in a de-identified way.

For your new request, originating April 1, 2016, CDPH is in the process of gathering and reviewing the requested records. Your request will take extra time to fulfill because:

> You have requested records located in multiple offices and/or facilities.
> You have requested a voluminous amount of records.

Consequently, CDPH is exercising its authority under Government Code, section 6253, subdivision (c), to extend the time to reply to a Public Records Act request. By April, 22, 2016, CDPH will notify you as to which records will be available for your review and which, if any, may be exempt from disclosure and why. Your request, as written, encompasses an unusually broad spectrum of records. Pursuant to Government Code section 6253.1, CDPH would like to work with you to make this request more focused and effective such that it "reasonably describes an identifiable record." For instance, is there a time frame for which you would like records, such as 2007 on? Given your prior correspondence, we interpret your request to be specific to Los Angeles but is there any specific topic relating to lead exposure in that jurisdiction that we should search within?

If you have any questions regarding this matter, please contact me.

Sincerely,

Melanie Neumeyer
Attorney
California Department of Public Health
Office of Legal Services
1415 L Street, Suite 500, Sacramento, CA 95814
(916) 440-7356

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EXHIBIT L

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Exempt from Filing Fees –
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David H. Yamasaki
Chief Executive Officer/Clerk
Superior Court of CA, County of Santa Clara
Case #1-00-CV-788657 Filing #G-51281
By R. Nelson, Deputy

SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF SANTA CLARA

UNLIMITED JURISDICTION

COUNTY OF SANTA CLARA, et al., Plaintiffs, **v.** **ATLANTIC RICHFIELD COMPANY, et al.,** Defendants.	Case No. 1-00-CV-788657 **DECLARATION OF DR. JOSEPH COURTNEY IN SUPPORT OF THE CHILDHOOD LEAD POISONING PREVENTION BRANCH AND THE CALIFORNIA DEPARTMENT OF PUBLIC HEALTH'S OBJECTION TO THE DISCOVERY REFEREE'S JANUARY 31, 2013 RECOMMENDATION** Date: March 1, 2013 Time: 9:00 a.m. Dept: 1 Judge: The Honorable James Kleinberg Trial Date: June 24, 2013 Action Filed: March 23, 2000

DECLARATION OF DR. JOSEPH COURTNEY

I, Joseph Courtney, declare as follows:

1. I am a Research Scientist III with the Childhood Lead Poisoning Prevention Branch (Childhood Lead Branch) at the California Department of Public Health (Department). Previously, I served as the Chief of the Program Evaluation and Research Section and was the Acting Chief of the Care Management Section at the Childhood Lead Branch. I am an epidemiologist by training and have a doctorate in Epidemiology from UCLA. I have worked at the Childhood Lead Branch since 2000 and, as part of my duties, I am familiar with the Response and Surveillance System for Childhood Lead Exposures (RASSCLE) databases. As to the following facts, unless otherwise stated, I know them to be true of my own knowledge and if called upon to do so, I would and could so testify. I submit this declaration in support of the Department and the Childhood Lead Branch's objection to the Discovery Referee's January 31, 2013 recommendation.

2. The Childhood Lead Branch no longer uses its RASSCLE I database. Most of the information in Childhood Lead Branch's RASSCLE I database concerned "cases" of lead-exposed children because, at the time, the Childhood Lead Branch only received information if a child's blood lead level reached a certain threshold. With the exception of data received from a few laboratories that voluntarily reported all blood lead levels in an electronic format, the RASSCLE I database was a standalone system into which most information had to be manually keyed. Therefore, if the Childhood Lead Branch received a blood lead test from a lab or an investigation report from one of its county contract partners, this information was manually keyed into its RASSCLE I system, with the exception of the limited electronic results sent by a few labs.

3. With the advent of the universal reporting of blood lead tests, the Childhood Lead Branch upgraded to the RASSCLE II database and migrated all of the data from its RASSCLE I database into the RASSCLE II database. Laboratories in California are required to report every blood lead test to the Childhood Lead Branch and this information is automatically channeled into the Childhood Lead Branch's RASSCLE II database. If a child's blood lead level reaches a

certain threshold, a contract partner launches an investigation, which is recorded on a Lead Poisoning Follow-Up Form. A true and correct copy of a Lead Poisoning Follow-Up Form is attached as Exhibit A. Some of the information from this form is then manually keyed into the RASSCLE II system. For redundancy purposes, county contract partners are expected to keep a copy of the completed Lead Poisoning Follow-Up Form, along with other information, in each case file for children with increased blood lead levels who receive services. Due to the universal, electronic reporting of blood lead tests in California, the vast majority of information in RASSCLE II does not relate to "cases."

4. After the January 24, 2013 security incident occurred, the Childhood Lead Branch implemented contingency measures to respond to The Sherwin-Williams Company's (Sherwin-Williams) June 15, 2012 subpoena. I have been actively participating in the planning and implementation of these contingency measures.

5. Using the ten topics disclosed on the court-approved notice, the Childhood Lead Branch identified four datasets (A, B, C, and D) within the RASSCLE databases that are responsive to these topics. These datasets were either created for internal purposes at the Childhood Lead Branch or in response to litigation involving the Childhood Lead Branch.

6. Dataset A is a Microsoft SQL database that includes information regarding blood lead tests from January 1, 1992 to April 4, 2012 for individuals assigned to one of the prosecuting entities. This dataset is based in part on the database previously provided to NL Industries, Inc. and will include the results of all blood lead tests entered into the RASSCLE II database, along with the address, gender, race, and year of birth of the individual receiving the blood lead test. This dataset will also include information contained in the age-of-housing fields that are associated with these records in the RASSCLE II database. One essential feature of this database is that for each individual, the database provides a unique Patient ID and an Address ID. This information is important because it allows Dataset A to be linked with Dataset B, C, and D.

7. Dataset C is from the Childhood Lead Branch's RASSCLE I system and it was previously produced during *Equilon Enterprises v. State Bd. of Equalization* (Sacramento Cty. Sup. Ct., Case No. 05AS02406). This Microsoft SQL database includes comprehensive

information on (1) lead-exposed children and their families, (2) environmental and non-environmental exposures to lead, and (3) health information for individuals from January 1, 1992 to March 28, 2006. Specifically, Dataset C provides information on the child's year of birth, gender, race and ethnicity, blood lead levels and sample types, the year the tests were conducted, the first, maximum and case-making blood lead results, information on lead-related health conditions, including symptoms and pregnancy status, number of people in the patient's household and their lead test results, findings related to the results of the public health nursing and environmental investigations, including sampling results of potential lead hazards, risk behaviors, possible exposures related to occupational sources of patient or family member, and history of time spent out of the United States in the prior year. Dataset C can be easily linked to Dataset A through Patient ID.

8. Dataset B is a Microsoft SQL database that provides environmental lead-exposure information from January 1, 2006 to April 4, 2012. Specifically, Dataset B provides information on blood lead tests, characteristics of the residence, and environmental sampling results. This dataset is from the RASSCLE II database and can be easily linked to Dataset A through both Patient ID and Address ID.

9. Dataset D is a Microsoft SQL database that contains information on the child, lead exposures, case initiation and disposition, and health information about lead-related health conditions from January 1, 1992 to April 4, 2012. Specifically, Dataset D provides information on the patient's year of birth, gender, race/ethnicity, case-making blood lead level, information on lead-related health conditions, including symptoms and pregnancy status, chelation episodes, number of people in the patient's household and their lead test results, findings related to the results of the public health nursing and environmental investigations, including sampling results of potential lead hazards, risk behaviors, possible exposures to cosmetics, food items, home remedies, pottery, and other sources, exposures related to occupational sources of for the patient or family member, and history of time spent out of the United States in the prior year, and detailed comprehensive environmental sampling results. This dataset is from the RASSCLE II database and can be easily linked to Dataset A through both Patient ID and Address ID.

10. I have been actively involved in the preparations for the Childhood Lead Branch's February 13, 2013 production and have learned that the majority of the individuals disclosed by Sherwin-Williams's vendor, Gensa Corporation, on January 24, 2013 are in the RASSCLE II database.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed February 11, 2013 in Atlanta, Georgia.

/s/ Dr. Joseph Courtney
Dr. Joseph Courtney, PhD

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EXHIBIT A

E-FILED: Feb 11, 2013 5:00 PM, Superior Court of CA, County of Santa Clara, Case #1-00-CV-788657 Filing #G-51281

Lead Poisoning Follow-up Form

Case Information

Year made case (if applicable)	Date of birth / /	Age Yrs. Mos.	Local ID No.	Case closed ☐ Yes

Last name	First name	Middle name
AKA last name	AKA first name	AKA middle name

Parent/Guardian case lives with (name)	Relationship	Daytime phone

Mother's name First Middle Last Maiden	Date of birth / /	Daytime phone
Father's name First Middle Last	Date of birth / /	Daytime phone

☐ Male ☐ Female	Language spoken at home	Was interview in English? ☐ Yes ☐ No	Social Security No. - -

Medi-Cal No.	BIN No. (if applicable)

Address at case identification (If address changes, enter new address on Page 6)	Census tract No.	Parcel No.

City	County	State	Zip Code	If case lost to follow-up, is this the last known address? ☐ Yes

Home phone	Message phone/Alternate contact	Dwelling type ☐ Single family ☐ Multiple units (_____)	Ownership type ☐ Owner occupied ☐ Rental ☐ Public ☐ Other _____ ☐ Publicly subsidized (Section 8)

Site type ☐ Primary ☐ Former	Note about address	Resided from / /	Resided until / / ☐ Present

Estimated year built ☐ Pre-1920 ☐ 1920 – 1939 ☐ 1940 – 1949 ☐ 1950 – 1959 ☐ 1960 – 1979 ☐ 1980+ ☐ Don't know | Pre-1978? ☐ Yes

Remodeling, painting or renovation within the last ***year***? ☐ Yes ☐ No ☐ Don't know

Where was most recent remodeling done? ☐ Interior ☐ Exterior ☐ Both ☐ Don't know

Who did this remodeling? Check all that apply: ☐ Self/Family ☐ Property owner ☐ Licensed contractor ☐ Don't know ☐ Other: _____

Describe: _____

Owner (If different from occupant) Name	Phone
Address	

Associated Cases

Name	Local ID No.	(circle one)	Date of birth	Relationship to case (circle one)
		Index case Secondary	/ /	Mother Sibling Twin Child Other household member Neighbor Daycare Work-related Other: _____
		Index case Secondary	/ /	Mother Sibling Twin Child Other household member Neighbor Daycare Work-related Other: _____
		Index case Secondary	/ /	Mother Sibling Twin Child Other household member Neighbor Daycare Work-related Other: _____
		Index case Secondary	/ /	Mother Sibling Twin Child Other household member Neighbor Daycare Work-related Other: _____

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Case Information, cont.

Race (choose one or more)

- ☐ Native American/Alaskan
- ☐ Black/African American
- ☐ White
- ☐ Asian
- ☐ Pacific Islander
- ☐ Other Race: _____
- ☐ Decline to state

→ If Asian or Pacific Islander, please specify:

- ☐ Asian Indian
- ☐ Cambodian
- ☐ Chinese
- ☐ Filipino
- ☐ Guamanian
- ☐ Hawaiian
- ☐ Hmong
- ☐ Japanese
- ☐ Korean
- ☐ Laotian
- ☐ Samoan
- ☐ Other Asian
- ☐ Vietnamese
- ☐ Other Pacific Islander

Country of birth

If US, Mexico, or Canada, specify State or Province:

Is the case's ethnic background Spanish/Hispanic/Latino?

- ☐ No, not Spanish/Hispanic/Latino
- ☐ Yes, North American (Mexican, Mexican American, Chicano)
- ☐ Yes, Central American
- ☐ Yes, South American
- ☐ Yes, other Spanish/Hispanic/Latino — Specify: _____

Administrative Information

CASE INITIATION

Origin of case notification

- ☐ Laboratory
- ☐ State CLPPB
- ☐ Provider
- ☐ Transferred from other health dept. → Specify: _____
- ☐ Other: _____

Date of case-making BLL: / /

First LHD first received notice: / /

Date first LPFF sent to State: / /

Date of authorization/consent: / /

Date case first assigned to PHN: / /

PHN home visit done? ☐ Yes ☐ No

Date of first home visit: / /

Date environmental health notified of case: / /

Primary residence environmental investigation done? ☐ Yes ☐ No

Date of initial environmental investigation: / /

CASE DISPOSITION

☐ Not a case → Specify reason:

☐ False positive → Specify:

Original Result

PbB, µg/dL	Method	Date drawn	Analyzing laboratory
	☐ Venous ☐ Capillary ☐ Filter paper ☐ Other: _____	/ /	

Subsequent Result

PbB, µg/dL	Method	Date drawn	Analyzing laboratory
	☐ Venous ☐ Other: _____	/ /	

☐ EBL, not State case

☐ Clerical error

☐ Duplicate: Name of original case _____ DOB: / /

PHN Case Closure

PHN case closed? ☐ Yes → Date closed: / / Date closing LPFF sent to State CLPPB: / /

Reason for closure

- ☐ Standard clinical closure
- ☐ Unable to locate family
- ☐ Transferred to other health dept.
- ☐ Persistent refusal
- ☐ Admin., explain: _____

For all transfers, complete the following:

Date of transfer: / /

Check one:

- ☐ Case moved within CA
- ☐ Case moved to other US state
- ☐ Other: _____

If transferred, complete the following:

New address: _____

Local health department referred to: _____

Staff Assigned to Case

Name	*Position*	*Address*	*Phone*	*Dates associated with case* From	Until
				/ /	/ /
				/ /	/ /
				/ /	/ /

Name _____ D.O.B ___/___/___ State ID# _____

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BLOOD LEAD RESULTS

PbB, µg/dL	Type/Method	Date drawn	Analyzing laboratory
	☐ Venous ☐ Capillary ☐ Filter paper ☐ Other: _____	/ /	
	☐ Venous ☐ Capillary ☐ Filter paper ☐ Other: _____	/ /	
	☐ Venous ☐ Capillary ☐ Filter paper ☐ Other: _____	/ /	
	☐ Venous ☐ Capillary ☐ Filter paper ☐ Other: _____	/ /	
	☐ Venous ☐ Capillary ☐ Filter paper ☐ Other: _____	/ /	
	☐ Venous ☐ Capillary ☐ Filter paper ☐ Other: _____	/ /	
	☐ Venous ☐ Capillary ☐ Filter paper ☐ Other: _____	/ /	
	☐ Venous ☐ Capillary ☐ Filter paper ☐ Other: _____	/ /	
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	☐ Venous ☐ Capillary ☐ Filter paper ☐ Other: _____	/ /	
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	☐ Venous ☐ Capillary ☐ Filter paper ☐ Other: _____	/ /	
	☐ Venous ☐ Capillary ☐ Filter paper ☐ Other: _____	/ /	
	☐ Venous ☐ Capillary ☐ Filter paper ☐ Other: _____	/ /	

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Other Blood Results

Date	Hemoglobin	Hematocrit	Ferritin	Iron (Fe)	TIBC	Date	Hemoglobin	Hematocrit	Ferritin	Iron (Fe)	TIBC
/ /						/ /					
/ /						/ /					
/ /						/ /					
/ /						/ /					
/ /						/ /					
/ /						/ /					
/ /						/ /					
/ /						/ /					

Chelation Episodes

Was case chelated? ☐ Yes ☐ No ☐ Don't know

Number of chelation episodes _____

Which agent(s)? Check all that apply
☐ $CaNa_2EDTA$ ☐ Penicillamine
☐ BAL ☐ Don't know
☐ Succimer (Chemet)
☐ Other: _____

Chelation start date / /

Chelation end date / /

Did case ever receive a chelation challenge test? ☐ Yes ☐ No ☐ Don't know

Was case hospitalized for chelation? ☐ Yes ☐ No ☐ Don't know

Where? _____

Chelating physician name *Phone*

Which agent(s)? Check all that apply
☐ $CaNa_2EDTA$ ☐ Penicillamine
☐ BAL ☐ Don't know
☐ Succimer (Chemet)
☐ Other: _____

Chelation start date / /

Chelation end date / /

Did case ever receive a chelation challenge test? ☐ Yes ☐ No ☐ Don't know

Was case hospitalized for chelation? ☐ Yes ☐ No ☐ Don't know

Where? _____

Chelating physician name *Phone*

Which agent(s)? Check all that apply
☐ $CaNa_2EDTA$ ☐ Penicillamine
☐ BAL ☐ Don't know
☐ Succimer (Chemet)
☐ Other: _____

Chelation start date / /

Chelation end date / /

Did case ever receive a chelation challenge test? ☐ Yes ☐ No ☐ Don't know

Was case hospitalized for chelation? ☐ Yes ☐ No ☐ Don't know

Where? _____

Chelating physician name *Phone*

Which agent(s)? Check all that apply
☐ $CaNa_2EDTA$ ☐ Penicillamine
☐ BAL ☐ Don't know
☐ Succimer (Chemet)
☐ Other: _____

Chelation start date / /

Chelation end date / /

Did case ever receive a chelation challenge test? ☐ Yes ☐ No ☐ Don't know

Was case hospitalized for chelation? ☐ Yes ☐ No ☐ Don't know

Where? _____

Chelating physician name *Phone*

Which agent(s)? Check all that apply
☐ $CaNa_2EDTA$ ☐ Penicillamine
☐ BAL ☐ Don't know
☐ Succimer (Chemet)
☐ Other: _____

Chelation start date / /

Chelation end date / /

Did case ever receive a chelation challenge test? ☐ Yes ☐ No ☐ Don't know

Was case hospitalized for chelation? ☐ Yes ☐ No ☐ Don't know

Where? _____

Chelating physician name *Phone*

Which agent(s)? Check all that apply
☐ $CaNa_2EDTA$ ☐ Penicillamine
☐ BAL ☐ Don't know
☐ Succimer (Chemet)
☐ Other: _____

Chelation start date / /

Chelation end date / /

Did case ever receive a chelation challenge test? ☐ Yes ☐ No ☐ Don't know

Was case hospitalized for chelation? ☐ Yes ☐ No ☐ Don't know

Where? _____

Chelating physician name *Phone*

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Other Medical Management Information

How was the initial blood lead test paid for?
☐ Private insurance ☐ Self ☐ Healthy Families
☐ Medi-Cal ☐ Don't know
☐ CHDP ☐ Other: _____

Why was the initial blood lead test done?
☐ Routine screen ☐ Anemia/Iron deficiency ☐ Don't know
☐ Known exposure to lead ☐ Special screening project ☐ Other: _____
☐ Symptoms of lead poisoning ☐ Parental request

Is case enrolled in Medi-Cal? ☐ Yes ☐ No → *If Yes, is child full-scope?* ☐ Yes ☐ No *Eligibility date* / /

Medi-Cal Managed Care ☐ Yes *Which plan?* _____ *Share of cost?* ☐ Yes

Is case enrolled in Healthy Families? ☐ Yes ☐ No *Eligibility date* / /

Is case enrolled in EAPC? ☐ Yes ☐ No

Is case managed by CCS? ☐ Yes ☐ No → *If No, was referral made?* ☐ Yes ☐ No

Is case covered by a private health plan or HMO (not Medi-Cal)? ☐ Yes ☐ No → *If Yes, specify (e.g., Kaiser, HealthNet):*

Date PCP contacted: / /

Did PCP determine environmental investigation medically necessary? ☐ Yes ☐ No

Date case summary sent to PCP: / /

Height of case _____ *Weight of case* _____

Was nutrition assessment done? ☐ Yes ☐ No → *If Yes, by whom?* ☐ RD ☐ PHN

Did PHN perform a neurodevelopmental assessment? ☐ Yes ☐ No

Is case on WIC? ☐ Yes ☐ No → *If No, was referral made?* ☐ Yes ☐ No

Is the case pregnant? ☐ Yes ☐ No ☐ Don't know

Is case being breast fed? ☐ Yes ☐ No

Is case a nursing mother? ☐ Yes ☐ No

Has the case ever been anemic (hemoglobin blood result less than but not including 11 in a child)? ☐ Yes ☐ No ☐ Don't know → *If yes, when:* / / *to* / /

→ *Has case been given iron supplements?* ☐ Yes ☐ No ☐ Don't know

Has the case had any symptoms of lead poisoning? ☐ Yes ☐ No ☐ If Yes, specify:

_____

_____

Provider's last name *First name* *Hospital/Clinic*

Number and street *Phone*

City *County* *State* *Zip Code*

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ADDRESS HISTORY

List all case's residences for the past year, other addresses where case regularly spends >4 hours/week, or any new address if case moves, excluding address reported on page 1.

Number & street | *City* | *County* | *State* | *Zip code*

Resided/spent time From: / / Until: / / ☐ Present | *Phone* | *Notes about address*

Dwelling type ☐ Single family ☐ Multiple units (____) | *Ownership type* ☐ Owner occupied ☐ Rental ☐ Publicly subsidized (Sec 8) ☐ Public ☐ Other

Site type ☐ Primary address ☐ Daycare/Babysitter ☐ Former address ☐ Mailing address ☐ Relative / Friend / Neighbor ☐ Preschool ☐ School ☐ Other: | *If the case is lost to follow-up, is this the last known address ?* ☐ Yes

Estimated year built ☐ Pre 1920 ☐ 1940-1949 ☐ 1960-1979 ☐ Don't Know ☐ 1920-1939 ☐ 1950-1959 ☐ 1980+ | Pre 1978? ☐ Yes | Census tract no. | Parcel no.

*Remodeling, painting or renovation within the last **year**?* ☐ Yes ☐ No ☐ Don't know

Where was most recent remodeling done? ☐ Interior ☐ Exterior ☐ Both ☐ Don't know

Who did this remodeling? Check all that apply: ☐ Self/Family ☐ Property owner ☐ Licensed contractor ☐ Don't know ☐ Other ___

Describe: ___

Owner (if different from occupant) Name ___ Phone ___ Address ___

Number & street | *City* | *County* | *State* | *Zip code*

Resided/spent time From: / / Until: / / ☐ Present | *Phone* | *Notes about address*

Dwelling type ☐ Single family ☐ Multiple units (____) | *Ownership type* ☐ Owner occupied ☐ Rental ☐ Publicly subsidized (Sec 8) ☐ Public ☐ Other

Site type ☐ Primary address ☐ Daycare/Babysitter ☐ Former address ☐ Mailing address ☐ Relative / Friend / Neighbor ☐ Preschool ☐ School ☐ Other: | *If the case is lost to follow-up, is this the last known address ?* ☐ Yes

Estimated year built ☐ Pre 1920 ☐ 1940-1949 ☐ 1960-1979 ☐ Don't Know ☐ 1920-1939 ☐ 1950-1959 ☐ 1980+ | Pre 1978? ☐ Yes | Census tract no. | Parcel no.

*Remodeling, painting or renovation within the last **year**?* ☐ Yes ☐ No ☐ Don't know

Where was most recent remodeling done? ☐ Interior ☐ Exterior ☐ Both ☐ Don't know

Who did this remodeling? Check all that apply: ☐ Self/Family ☐ Property owner ☐ Licensed contractor ☐ Don't know ☐ Other ___

Describe: ___

Owner (if different from occupant) Name ___ Phone ___ Address ___

Number & street | *City* | *County* | *State* | *Zip code*

Resided/spent time From: / / Until: / / ☐ Present | *Phone* | *Notes about address*

Dwelling type ☐ Single family ☐ Multiple units (____) | *Ownership type* ☐ Owner occupied ☐ Rental ☐ Publicly subsidized (Sec 8) ☐ Public ☐ Other

Site type ☐ Primary address ☐ Daycare/Babysitter ☐ Former address ☐ Mailing address ☐ Relative / Friend / Neighbor ☐ Preschool ☐ School ☐ Other: | *If the case is lost to follow-up, is this the last known address ?* ☐ Yes

Estimated year built ☐ Pre 1920 ☐ 1940-1949 ☐ 1960-1979 ☐ Don't Know ☐ 1920-1939 ☐ 1950-1959 ☐ 1980+ | Pre 1978? ☐ Yes | Census tract no. | Parcel no.

*Remodeling, painting or renovation within the last **year**?* ☐ Yes ☐ No ☐ Don't know

Where was most recent remodeling done? ☐ Interior ☐ Exterior ☐ Both ☐ Don't know

Who did this remodeling? Check all that apply: ☐ Self/Family ☐ Property owner ☐ Licensed contractor ☐ Don't know ☐ Other ___

Describe: ___

Owner (if different from occupant) Name ___ Phone ___ Address ___

Name ___ E-FILED: Feb 11, 2013 5:00 PM, Superior Court of CA, County of Santa Clara, Case #1-00-CV-788657 Filing #G-51281 D.O.B. ___/___/___ State ID# _____

CASE EXPOSURE

MOBILITY AND BEHAVIOR

*Has case **lived** outside of the U.S. in the last **year**?* ☐ Yes ☐ No

If YES, where? _____ *Date last moved to US:* ___/___ (Mo. Yr.)

*Has case **traveled** outside of the U.S. in the last **year**?* ☐ Yes ☐ No → *If yes, where?* _____ *When?* / / *to* / /

Note potential lead-related findings from the home tour (including inside of home, porch, garage, and outside areas).

_____

_____

Places case spends a lot of time, other than home. Check all that apply. (Add location to Address History page. Consider site investigation if appropriate.)

☐ None ☐ Daycare/Baby-sitter ☐ Preschool ☐ School ☐ Relative/Friend/Neighbor ☐ Other: _____

*Has case been seen eating any **paint chips**?* ☐ Yes ☐ No ☐ Don't know

*Has case been seen frequently eating **soil**?* ☐ Yes ☐ No ☐ Don't know

*Has case been seen eating **other nonfood items** ?* ☐ Yes ☐ No ☐ Don't know Please specify: _____

HOME REMEDIES/TRADITIONAL MEDICINES

Does your family use any home remedies? ☐ Yes ☐ No ☐ Don't know

☐ Azarcon ☐ Greta ☐ Paylooah ☐ Other home remedy: _____ *Sample collected?* ☐ Yes ☐ No

Was remedy given to case? ☐ Yes ☐ No ☐ Don't know

List other household members given remedy: _____

_____

Date last given to case: / /	*How much was given to the case?* _____ x _____ (Total amount/day (ex: tbsp, tsp, etc.) Duration (days, wks, etc.))
How many times in the last year?	*For what purpose was the home remedy given to the case?*

POTTERY/UTENSILS

Do you have any imported or handmade ceramics in the household? (List those with which case comes into contact.) ☐ Yes ☐ No ☐ Don't know

List any imported or handmade ceramics	*Describe its use*	*Test kit result*	*Sample collected?*
		☐ Neg ☐ Pos	☐ Yes ☐ No
		☐ Neg ☐ Pos	☐ Yes ☐ No
		☐ Neg ☐ Pos	☐ Yes ☐ No

Out of what does the case usually eat and drink?

COSMETICS

Are any of these cosmetics ever used in the household? ☐ Yes ☐ No ☐ Don't know

☐ Kohl ☐ Surma ☐ Ceruse ☐ Other cosmetic: _____

Sample collected? ☐ Yes ☐ No

Were these cosmetics used by case? ☐ Yes ☐ No ☐ Don't know

List other household members using these cosmetics (note if pregnant): _____

_____

How long used by case?

Date last used by case: / /	*How many times used in the last year?*

OTHER

Retained bullet? ☐ Yes → *If Yes, since when?* / /

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CASE EXPOSURE, CONT.

FOOD/DRINK ITEMS (CANDY, LEAD SOLDERED CANS, CHILI SEASONING, IMPORTED INGREDIENTS, ETC.)

Item	*Description (including brand name)*	*Test kit result*	*Sample collected?*
		☐ Negative ☐ Positive	☐ Yes ☐ No

Was this food/drink item made in the U.S.? ☐ Yes ☐ No ☐ Don't know → *If no, where?* ___

Was this food/drink item bought in the U.S.? ☐ Yes ☐ No ☐ Don't know → *Where?* ___

Was food/drink item given to case? ☐ Yes ☐ No ☐ Don't know

List other household members given food/drink item: ___

Date last given to case: / / *How much was given to the case?* ___ x ___
Total amount/day (ex: tbsp, tsp, etc.) Duration (days, wks, etc.)

How many times in the last year?

Item	*Description (including brand name)*	*Test kit result*	*Sample collected?*
		☐ Negative ☐ Positive	☐ Yes ☐ No

Was this food/drink item made in the U.S.? ☐ Yes ☐ No ☐ Don't know → *If no, where?* ___

Was this food/drink item bought in the U.S.? ☐ Yes ☐ No ☐ Don't know → *Where?* ___

Was food/drink item given to case? ☐ Yes ☐ No ☐ Don't know

List other household members given food/drink item: ___

Date last given to case: / / *How much was given to the case?* ___ x ___
Total amount/day (ex: tbsp, tsp, etc.) Duration (days, wks, etc.)

How many times in the last year?

Item	*Description (including brand name)*	*Test kit result*	*Sample collected?*
		☐ Negative ☐ Positive	☐ Yes ☐ No

Was this food/drink item made in the U.S.? ☐ Yes ☐ No ☐ Don't know → *If no, where?* ___

Was this food/drink item bought in the U.S.? ☐ Yes ☐ No ☐ Don't know → *Where?* ___

Was food/drink item given to case? ☐ Yes ☐ No ☐ Don't know

List other household members given food/drink item: ___

Date last given to case: / / *How much was given to the case?* ___ x ___
Total amount/day (ex: tbsp, tsp, etc.) Duration (days, wks, etc.)

How many times in the last year?

OTHER POTENTIAL SOURCES INVESTIGATED (Lead shot, prenatal exposure, miniblinds, etc.) See page 9 for take-home exposure.

Other potential sources investigated? ☐ Yes ☐ No ☐ Don't know

Source	*Describe its use/Exposure to case*	*Duration of use/Exposure*	*Test kit result*	*Sample collected?*
			☐ Neg ☐ Pos	☐ Yes ☐ No
			☐ Neg ☐ Pos	☐ Yes ☐ No
			☐ Neg ☐ Pos	☐ Yes ☐ No
			☐ Neg ☐ Pos	☐ Yes ☐ No
			☐ Neg ☐ Pos	☐ Yes ☐ No
			☐ Neg ☐ Pos	☐ Yes ☐ No
			☐ Neg ☐ Pos	☐ Yes ☐ No

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HOUSEHOLD

HOUSEHOLD MEMBERS *(List all household members. If household changes significantly, add copy of this page.)*

Address of site *Date of initial site visit* / /

Name	√ if existing case	√ if pregnant	√ if nursing	Relation to case	Date of birth	Age	Occupation	Most recent test result Date tested	µg/dL
CASE	√				/ /				
					/ /			/ /	
					/ /			/ /	
					/ /			/ /	
					/ /			/ /	
					/ /			/ /	
					/ /			/ /	
					/ /			/ /	
					/ /			/ /	
					/ /			/ /	

TAKE-HOME (Painting, radiator repair, battery manufacturer, foundry work, pottery/ceramics manufacturer, scrap metal recycling, firearm shooting, etc.)

Do any adults in the household work with lead? ☐ Yes ☐ No ☐ Don't know

If Yes, date State Occupational Lead Poisoning Prevention Program notified: / /

Who?	Describe occupation	What is the source of lead exposure?	How long doing this kind of work?	Is clothing changed before leaving work?	Is shower taken before leaving work?	Routine blood lead test?
			Yrs. Mos.	☐ Yes ☐ No	☐ Yes ☐ No	☐ Yes ☐ No
			Yrs. Mos.	☐ Yes ☐ No	☐ Yes ☐ No	☐ Yes ☐ No

HOBBIES

Does anyone in the home have a hobby that involves lead? ☐ Yes ☐ No ☐ Don't know

If Yes: ☐ Soldering ☐ Fishing sinkers ☐ Stained glass ☐ Ceramics ☐ Casting bullets ☐ Shooting guns ☐ Other: _____

Who?	What hobby?	How long have activities been done?	Done where?	(For hobbies done outside home) Is clothing changed before entering home?	Is shower taken before entering home?
		Yrs. Mos.		☐ Yes ☐ No	☐ Yes ☐ No
		Yrs. Mos.		☐ Yes ☐ No	☐ Yes ☐ No

For more take-home and hobby examples, please refer to PHN Manual, part 3.

PROBABLE EXPOSURES

In your judgment, what are the most probable sources of lead poisoning in this case?

Name E-FILED: Feb 11, 2013 5:00 PM, Superior Court of CA, County of Santa Clara, Case #1-00-CV-788657 Filing #G-51281 **D.O.B** / / **State ID#** _____

NOTES

For each entry, show date and time signed, full signature, and title.

Name _____ **D.O.B** ___/___/___ **State ID#** _____

ENVIRONMENTAL SECTION

ENVIRONMENTAL LABORATORY SUBMITTAL FORM

Use a separate form for each address.

CASE INFORMATION *Delete name prior to external use.*

Name		
Address sampled		
City	*County*	*Zip*
Local ID	*State ID*	

ENVIRONMENTAL PROFESSIONAL INFORMATION

Name ☐ REHS ☐ CIH ☐ Other environmental professional		
DHS Inspector/Assessor #	*Expiration date* / /	
Address	*Phone*	*Fax*
City	*County*	*Zip*
Date collected / /		

LABORATORY INFORMATION

Name		
Lab address	*Phone*	*Fax*
City	*County*	*Zip*

FOR LAB USE ONLY

Project ID	*LN*
Checked by	*Analyst*
Received / /	*Reported* / /

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State ID# _____

Address of site _____ *Date of environmental investigation* ____/____/____

Sampling Map and Property Sketch

State ID # _____

SAMPLES

Address sampled	*Lab name*	*Date collected*
		/ /
City	*County*	*Zip*

LAB PAINT CHIP SAMPLES (ppm)

Sample No.	*Location*	*Room/Side (per HUD)*	*Component*	*Condition (per HUD)*	*Substrate/Color*	*Lab Sample ID#*	*Result (ppm)*	*Result ≥std.?*
	☐ Interior ☐ Exterior	☐ Living room ☐ Bedroom ☐ Kitchen ☐ Bathroom ☐ Other: _____ Side: A B C D	☐ Door casing ☐ Door ☐ Window sash ☐ Wall ☐ Window sill ☐ Other: _____	☐ Fair (slightly det.) ☐ Poor (very det.)	☐ Wood ☐ Plaster ☐ Drywall ☐ Metal ☐ Other Color: _____			☐ Yes ☐ No
	☐ Interior ☐ Exterior	☐ Living room ☐ Bedroom ☐ Kitchen ☐ Bathroom ☐ Other: _____ Side: A B C D	☐ Door casing ☐ Door ☐ Window sash ☐ Wall ☐ Window sill ☐ Other: _____	☐ Fair (slightly det.) ☐ Poor (very det.)	☐ Wood ☐ Plaster ☐ Drywall ☐ Metal ☐ Other Color: _____			☐ Yes ☐ No
	☐ Interior ☐ Exterior	☐ Living room ☐ Bedroom ☐ Kitchen ☐ Bathroom ☐ Other: _____ Side: A B C D	☐ Door casing ☐ Door ☐ Window sash ☐ Wall ☐ Window sill ☐ Other: _____	☐ Fair (slightly det.) ☐ Poor (very det.)	☐ Wood ☐ Plaster ☐ Drywall ☐ Metal ☐ Other Color: _____			☐ Yes ☐ No
	☐ Interior ☐ Exterior	☐ Living room ☐ Bedroom ☐ Kitchen ☐ Bathroom ☐ Other: _____ Side: A B C D	☐ Door casing ☐ Door ☐ Window sash ☐ Wall ☐ Window sill ☐ Other: _____	☐ Fair (slightly det.) ☐ Poor (very det.)	☐ Wood ☐ Plaster ☐ Drywall ☐ Metal ☐ Other Color: _____			☐ Yes ☐ No
	☐ Interior ☐ Exterior	☐ Living room ☐ Bedroom ☐ Kitchen ☐ Bathroom ☐ Other: _____ Side: A B C D	☐ Door casing ☐ Door ☐ Window sash ☐ Wall ☐ Window sill ☐ Other: _____	☐ Fair (slightly det.) ☐ Poor (very det.)	☐ Wood ☐ Plaster ☐ Drywall ☐ Metal ☐ Other Color: _____			☐ Yes ☐ No
	☐ Interior ☐ Exterior	☐ Living room ☐ Bedroom ☐ Kitchen ☐ Bathroom ☐ Other: _____ Side: A B C D	☐ Door casing ☐ Door ☐ Window sash ☐ Wall ☐ Window sill ☐ Other: _____	☐ Fair (slightly det.) ☐ Poor (very det.)	☐ Wood ☐ Plaster ☐ Drywall ☐ Metal ☐ Other Color: _____			☐ Yes ☐ No
	☐ Interior ☐ Exterior	☐ Living room ☐ Bedroom ☐ Kitchen ☐ Bathroom ☐ Other: _____ Side: A B C D	☐ Door casing ☐ Door ☐ Window sash ☐ Wall ☐ Window sill ☐ Other: _____	☐ Fair (slightly det.) ☐ Poor (very det.)	☐ Wood ☐ Plaster ☐ Drywall ☐ Metal ☐ Other Color: _____			☐ Yes ☐ No

LAB BARE SOIL SAMPLES (ppm)

Sample No.	*XRF Reading No. (if confirmatory)*	*Location*	*Side (per HUD)*	*Lab Sample ID#*	*Result (ppm)*	*Result ≥std.?*
		☐ Dripline ☐ Play area ☐ Other: _____	A B C D			☐ Yes ☐ No
		☐ Dripline ☐ Play area ☐ Other: _____	A B C D			☐ Yes ☐ No
		☐ Dripline ☐ Play area ☐ Other: _____	A B C D			☐ Yes ☐ No
		☐ Dripline ☐ Play area ☐ Other: _____	A B C D			☐ Yes ☐ No

CHAIN OF CUSTODY

Sample No.	*Date and Time*	*Relinquished by (Signature)*	*Date and Time*	*Received by (Signature)*
	/ / : ☐ A.M. ☐ P.M.		/ / : ☐ A.M. ☐ P.M.	
	/ / : ☐ A.M. ☐ P.M.		/ / : ☐ A.M. ☐ P.M.	
	/ / : ☐ A.M. ☐ P.M.		/ / : ☐ A.M. ☐ P.M.	
	/ / : ☐ A.M. ☐ P.M.		/ / : ☐ A.M. ☐ P.M.	

State ID # _____

SAMPLES, CONT.

Address sampled	*Lab name*	*Date collected*
		/ /
City	*County*	*Zip*

LAB DUST WIPE SAMPLES (μg/ft²) Use ASTM approved wipes only.

Sample No.	*XRF Reading No. (if confirmatory)*	*Location*	*Room/Side (per HUD)*	*Component*	*Component Condition*	*Dimensions*	*Lab Sample ID#*	*Result (μg)*	*Result (μg/ft²)*	*Result ≥std.?*
		☐ Interior ☐ Exterior	☐ Living room ☐ Bedroom ☐ Kitchen ☐ Bathroom ☐ Other: _____ Side: A B C D	☐ Floor ☐ Window well ☐ Window sill ☐ Other: _____	☐ Intact ☐ Fair ☐ Poor	☐ 12" x 12" ☐ Other:				☐ Yes ☐ No
		☐ Interior ☐ Exterior	☐ Living room ☐ Bedroom ☐ Kitchen ☐ Bathroom ☐ Other: _____ Side: A B C D	☐ Floor ☐ Window well ☐ Window sill ☐ Other: _____	☐ Intact ☐ Fair ☐ Poor	☐ 12" x 12" ☐ Other:				☐ Yes ☐ No
		☐ Interior ☐ Exterior	☐ Living room ☐ Bedroom ☐ Kitchen ☐ Bathroom ☐ Other: _____ Side: A B C D	☐ Floor ☐ Window well ☐ Window sill ☐ Other: _____	☐ Intact ☐ Fair ☐ Poor	☐ 12" x 12" ☐ Other:				☐ Yes ☐ No
		☐ Interior ☐ Exterior	☐ Living room ☐ Bedroom ☐ Kitchen ☐ Bathroom ☐ Other: _____ Side: A B C D	☐ Floor ☐ Window well ☐ Window sill ☐ Other: _____	☐ Intact ☐ Fair ☐ Poor	☐ 12" x 12" ☐ Other:				☐ Yes ☐ No
		☐ Interior ☐ Exterior	☐ Living room ☐ Bedroom ☐ Kitchen ☐ Bathroom ☐ Other: _____ Side: A B C D	☐ Floor ☐ Window well ☐ Window sill ☐ Other: _____	☐ Intact ☐ Fair ☐ Poor	☐ 12" x 12" ☐ Other:				☐ Yes ☐ No
		☐ Interior ☐ Exterior	☐ Living room ☐ Bedroom ☐ Kitchen ☐ Bathroom ☐ Other: _____ Side: A B C D	☐ Floor ☐ Window well ☐ Window sill ☐ Other: _____	☐ Intact ☐ Fair ☐ Poor	☐ 12" x 12" ☐ Other:				☐ Yes ☐ No
		☐ Interior ☐ Exterior	☐ Living room ☐ Bedroom ☐ Kitchen ☐ Bathroom ☐ Other: _____ Side: A B C D	☐ Floor ☐ Window well ☐ Window sill ☐ Other: _____	☐ Intact ☐ Fair ☐ Poor	☐ 12" x 12" ☐ Other:				☐ Yes ☐ No

OTHER SAMPLES (pottery, imported products, water, etc.)

Sample No.	*Type of Sample*	*Description, Location, Comments* *Pottery: inside/outside tested* *Water: first draw sample, kitchen, faucet*	*Test Kit*	*Lab Sample ID#*	*Result*	*Units*
	☐ Cosmetic ☐ Pottery ☐ Home remedy ☐ Water ☐ Other: _____		☐ Pos ☐ Neg			
	☐ Cosmetic ☐ Pottery ☐ Home remedy ☐ Water ☐ Other: _____		☐ Pos ☐ Neg			
	☐ Cosmetic ☐ Pottery ☐ Home remedy ☐ Water ☐ Other: _____		☐ Pos ☐ Neg			

CHAIN OF CUSTODY

Sample No.	*Date and Time*	*Relinquished by (Signature)*	*Date and Time*	*Received by (Signature)*
	/ / : ☐ A.M. ☐ P.M.		/ / : ☐ A.M. ☐ P.M.	
	/ / : ☐ A.M. ☐ P.M.		/ / : ☐ A.M. ☐ P.M.	
	/ / : ☐ A.M. ☐ P.M.		/ / : ☐ A.M. ☐ P.M.	

State ID # _____

XRF Readings

Address sampled		Date collected
		/ /
City	County	Zip

XRF PAINT READINGS (mg/cm²)

Model	Serial No.	Testing mode used:

Calibrations — NIST 1.02 Standard Niton: K&L Mode, 20 Ssec Each RMD: Standard Mode

Calibration	Mode Used	1st. Reading No.	1st. Reading Value	2nd. Reading No.	2nd. Reading Value	3rd. Reading No.	3rd. Reading Value	Average of 3	PCS Range
Beginning									

Reading No.	Location	Room/Side (per HUD)	Component	Condition (per HUD)	Substrate/Color	Reading (mg/cm²)	Result ≥std.?
	☐ Interior ☐ Exterior	☐ Living room ☐ Bedroom ☐ Kitchen ☐ Bathroom ☐ Other: _____ Side: A B C D	☐ Door casing ☐ Door ☐ Window sash ☐ Wall ☐ Window sill ☐ Other: _____	☐ Intact ☐ Fair (slightly det.) ☐ Poor (very det.)	☐ Wood ☐ Plaster ☐ Drywall ☐ Metal ☐ Other Color: _____		☐ Yes ☐ No
	☐ Interior ☐ Exterior	☐ Living room ☐ Bedroom ☐ Kitchen ☐ Bathroom ☐ Other: _____ Side: A B C D	☐ Door casing ☐ Door ☐ Window sash ☐ Wall ☐ Window sill ☐ Other: _____	☐ Intact ☐ Fair (slightly det.) ☐ Poor (very det.)	☐ Wood ☐ Plaster ☐ Drywall ☐ Metal ☐ Other Color: _____		☐ Yes ☐ No
	☐ Interior ☐ Exterior	☐ Living room ☐ Bedroom ☐ Kitchen ☐ Bathroom ☐ Other: _____ Side: A B C D	☐ Door casing ☐ Door ☐ Window sash ☐ Wall ☐ Window sill ☐ Other: _____	☐ Intact ☐ Fair (slightly det.) ☐ Poor (very det.)	☐ Wood ☐ Plaster ☐ Drywall ☐ Metal ☐ Other Color: _____		☐ Yes ☐ No
	☐ Interior ☐ Exterior	☐ Living room ☐ Bedroom ☐ Kitchen ☐ Bathroom ☐ Other: _____ Side: A B C D	☐ Door casing ☐ Door ☐ Window sash ☐ Wall ☐ Window sill ☐ Other: _____	☐ Intact ☐ Fair (slightly det.) ☐ Poor (very det.)	☐ Wood ☐ Plaster ☐ Drywall ☐ Metal ☐ Other Color: _____		☐ Yes ☐ No
	☐ Interior ☐ Exterior	☐ Living room ☐ Bedroom ☐ Kitchen ☐ Bathroom ☐ Other: _____ Side: A B C D	☐ Door casing ☐ Door ☐ Window sash ☐ Wall ☐ Window sill ☐ Other: _____	☐ Intact ☐ Fair (slightly det.) ☐ Poor (very det.)	☐ Wood ☐ Plaster ☐ Drywall ☐ Metal ☐ Other Color: _____		☐ Yes ☐ No
	☐ Interior ☐ Exterior	☐ Living room ☐ Bedroom ☐ Kitchen ☐ Bathroom ☐ Other: _____ Side: A B C D	☐ Door casing ☐ Door ☐ Window sash ☐ Wall ☐ Window sill ☐ Other: _____	☐ Intact ☐ Fair (slightly det.) ☐ Poor (very det.)	☐ Wood ☐ Plaster ☐ Drywall ☐ Metal ☐ Other Color: _____		☐ Yes ☐ No
	☐ Interior ☐ Exterior	☐ Living room ☐ Bedroom ☐ Kitchen ☐ Bathroom ☐ Other: _____ Side: A B C D	☐ Door casing ☐ Door ☐ Window sash ☐ Wall ☐ Window sill ☐ Other: _____	☐ Intact ☐ Fair (slightly det.) ☐ Poor (very det.)	☐ Wood ☐ Plaster ☐ Drywall ☐ Metal ☐ Other Color: _____		☐ Yes ☐ No
	☐ Interior ☐ Exterior	☐ Living room ☐ Bedroom ☐ Kitchen ☐ Bathroom ☐ Other: _____ Side: A B C D	☐ Door casing ☐ Door ☐ Window sash ☐ Wall ☐ Window sill ☐ Other: _____	☐ Intact ☐ Fair (slightly det.) ☐ Poor (very det.)	☐ Wood ☐ Plaster ☐ Drywall ☐ Metal ☐ Other Color: _____		☐ Yes ☐ No
	☐ Interior ☐ Exterior	☐ Living room ☐ Bedroom ☐ Kitchen ☐ Bathroom ☐ Other: _____ Side: A B C D	☐ Door casing ☐ Door ☐ Window sash ☐ Wall ☐ Window sill ☐ Other: _____	☐ Intact ☐ Fair (slightly det.) ☐ Poor (very det.)	☐ Wood ☐ Plaster ☐ Drywall ☐ Metal ☐ Other Color: _____		☐ Yes ☐ No
	☐ Interior ☐ Exterior	☐ Living room ☐ Bedroom ☐ Kitchen ☐ Bathroom ☐ Other: _____ Side: A B C D	☐ Door casing ☐ Door ☐ Window sash ☐ Wall ☐ Window sill ☐ Other: _____	☐ Intact ☐ Fair (slightly det.) ☐ Poor (very det.)	☐ Wood ☐ Plaster ☐ Drywall ☐ Metal ☐ Other Color: _____		☐ Yes ☐ No

Calibrations — NIST 1.02 Standard Niton: K&L Mode, 20 Ssec Each RMD: Standard Mode

Calibration	Mode Used	1st. Reading No.	1st. Reading Value	2nd. Reading No.	2nd. Reading Value	3rd. Reading No.	3rd. Reading Value	Average of 3	PCS Range
Ending									

State ID # _____

XRF READINGS, CONT.

Address sampled | *Date collected* / /

City | *County* | *Zip*

XRF DUST WIPE READINGS (μg/ft²) Use ASTM approved wipes only.

Dust standard range _____ – _____ μg

Final calibration (60 Ssec x 4) *Reading no.* _____ *Value* _____

Reading No.	*Location*	*Room/Side (per HUD)*	*Component*	*Component Condition*	*Dimensions*	*Result (μg)*	*Result (μg/ft²)*	*Result ≥std.?*
	☐ Interior ☐ Exterior	☐ Living room ☐ Bedroom ☐ Kitchen ☐ Bathroom ☐ Other: _____ Side: A B C D	☐ Floor ☐ Window well ☐ Window sill ☐ Other: _____	☐ Intact ☐ Fair ☐ Poor	☐ 12" x 12" ☐ Other:			☐ Yes ☐ No
	☐ Interior ☐ Exterior	☐ Living room ☐ Bedroom ☐ Kitchen ☐ Bathroom ☐ Other: _____ Side: A B C D	☐ Floor ☐ Window well ☐ Window sill ☐ Other: _____	☐ Intact ☐ Fair ☐ Poor	☐ 12" x 12" ☐ Other:			☐ Yes ☐ No
	☐ Interior ☐ Exterior	☐ Living room ☐ Bedroom ☐ Kitchen ☐ Bathroom ☐ Other: _____ Side: A B C D	☐ Floor ☐ Window well ☐ Window sill ☐ Other: _____	☐ Intact ☐ Fair ☐ Poor	☐ 12" x 12" ☐ Other:			☐ Yes ☐ No
	☐ Interior ☐ Exterior	☐ Living room ☐ Bedroom ☐ Kitchen ☐ Bathroom ☐ Other: _____ Side: A B C D	☐ Floor ☐ Window well ☐ Window sill ☐ Other: _____	☐ Intact ☐ Fair ☐ Poor	☐ 12" x 12" ☐ Other:			☐ Yes ☐ No
	☐ Interior ☐ Exterior	☐ Living room ☐ Bedroom ☐ Kitchen ☐ Bathroom ☐ Other: _____ Side: A B C D	☐ Floor ☐ Window well ☐ Window sill ☐ Other: _____	☐ Intact ☐ Fair ☐ Poor	☐ 12" x 12" ☐ Other:			☐ Yes ☐ No
	☐ Interior ☐ Exterior	☐ Living room ☐ Bedroom ☐ Kitchen ☐ Bathroom ☐ Other: _____ Side: A B C D	☐ Floor ☐ Window well ☐ Window sill ☐ Other: _____	☐ Intact ☐ Fair ☐ Poor	☐ 12" x 12" ☐ Other:			☐ Yes ☐ No
	☐ Interior ☐ Exterior	☐ Living room ☐ Bedroom ☐ Kitchen ☐ Bathroom ☐ Other: _____ Side: A B C D	☐ Floor ☐ Window well ☐ Window sill ☐ Other: _____	☐ Intact ☐ Fair ☐ Poor	☐ 12" x 12" ☐ Other:			☐ Yes ☐ No

XRF BARE SOIL READINGS (ppm)

Medium NIST std. 1162 ppm

Range: 1046 – 1278 ppm

Calibration reading (60 Ssec) *Reading no.* _____ *Value* _____

Reading No.	*Location*	*Side (per HUD)*	*Test Type*	*Reading (ppm)*	*Result ≥std.?*
	☐ Dripline ☐ Play area ☐ Other source: _____	A B C D	☐ Surface		☐ Yes ☐ No
			☐ Test cup		☐ Yes ☐ No
	☐ Dripline ☐ Play area ☐ Other source: _____	A B C D	☐ Surface		☐ Yes ☐ No
			☐ Test cup		☐ Yes ☐ No
	☐ Dripline ☐ Play area ☐ Other source: _____	A B C D	☐ Surface		☐ Yes ☐ No
			☐ Test cup		☐ Yes ☐ No
	☐ Dripline ☐ Play area ☐ Other source: _____	A B C D	☐ Surface		☐ Yes ☐ No
			☐ Test cup		☐ Yes ☐ No
	☐ Dripline ☐ Play area ☐ Other source: _____	A B C D	☐ Surface		☐ Yes ☐ No
			☐ Test cup		☐ Yes ☐ No

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State ID # _____

Address of site _____ *Date of environmental investigation* ____/____/____

SOURCES OF EXPOSURE IDENTIFIED — DECISION LOGIC WORKSHEET

Exposure Criteria — Check all criteria that apply for each sample below

A – Above regulatory standard
B – Area accessible to case
C – Case contact or ingestion
D – Deteriorated surface
E – Bare soil surface
F – Proximity to exterior deteriorated paint or bare soil
G – Other: _____

PAINT

Sample/XRF No.	*Type*	*Location/Room Component*	*Applicable Exposure Criteria*
	☐ XRF ☐ Lab		☐ A ☐ B ☐ C ☐ D ☐ G
	☐ XRF ☐ Lab		☐ A ☐ B ☐ C ☐ D ☐ G
	☐ XRF ☐ Lab		☐ A ☐ B ☐ C ☐ D ☐ G
	☐ XRF ☐ Lab		☐ A ☐ B ☐ C ☐ D ☐ G
	☐ XRF ☐ Lab		☐ A ☐ B ☐ C ☐ D ☐ G
	☐ XRF ☐ Lab		☐ A ☐ B ☐ C ☐ D ☐ G
	☐ XRF ☐ Lab		☐ A ☐ B ☐ C ☐ D ☐ G

☐ No paint sources identified

DUST

Sample/XRF No.	*Type*	*Location/Room Component*	*Applicable Exposure Criteria*
	☐ XRF ☐ Lab		☐ A ☐ B ☐ C ☐ D ☐ F ☐ G
	☐ XRF ☐ Lab		☐ A ☐ B ☐ C ☐ D ☐ F ☐ G
	☐ XRF ☐ Lab		☐ A ☐ B ☐ C ☐ D ☐ F ☐ G
	☐ XRF ☐ Lab		☐ A ☐ B ☐ C ☐ D ☐ F ☐ G
	☐ XRF ☐ Lab		☐ A ☐ B ☐ C ☐ D ☐ F ☐ G

☐ No dust sources identified

SOIL

Sample/XRF No.	*Type*	*Location/Side*	*Applicable Exposure Criteria*
	☐ XRF ☐ Lab		☐ A ☐ B ☐ C ☐ E ☐ F ☐ G
	☐ XRF ☐ Lab		☐ A ☐ B ☐ C ☐ E ☐ F ☐ G
	☐ XRF ☐ Lab		☐ A ☐ B ☐ C ☐ E ☐ F ☐ G

☐ No soil sources identified

OTHER

Sample ID No.	*Type*	*Description*	*Applicable Exposure Criteria*
	☐ Test kit ☐ Lab		☐ A ☐ B ☐ C ☐ D ☐ F ☐ G
	☐ Test kit ☐ Lab		☐ A ☐ B ☐ C ☐ D ☐ F ☐ G
	☐ Test kit ☐ Lab		☐ A ☐ B ☐ C ☐ D ☐ F ☐ G

☐ No other sources identified

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ENVIRONMENTAL INVESTIGATION — Summary Statement

Address sampled	*Date of referral* / /
City/County/Zip	*Date of environmental investigation* / / — *Time arrived at address* : — *Time departed address* :
Phone — *Estimated year built*	*Date of summary statement* / /
Case Local ID#	*Environmental professional name*
Medi-Cal #	*I/A #* — *Expiration date* / /
Persons present during initial environmental investigation	*Environmental investigation closure date* / /
	Reason for EI closure: ☐ No environmental lead hazard sources identified ☐ Clearance achieved

1. VISUAL ASSESSMENT (Note paint condition, areas of bare soil, areas of remodeling/renovation in the last 6 months)

Exterior

Interior

Housing Environment/Characteristics

Estimated year built ☐ Pre-1920 ☐ 1920 – 1939 ☐ 1940 – 1949 ☐ 1950 – 1959 ☐ 1960 – 1979 ☐ 1980+ ☐ Don't know — *Pre-1978?* ☐ Yes

*Remodeling, painting or renovation within the last **year**?* ☐ Yes ☐ No ☐ Don't know

Where was most recent remodeling done? ☐ Interior ☐ Exterior ☐ Both ☐ Don't know

Who did this remodeling? Check all that apply: ☐ Self/Family ☐ Property owner ☐ Licensed contractor ☐ Don't know ☐ Other _____

Describe: _____

Is this site close to a lead industry? ☐ Yes ☐ No ☐ Don't know

Specify: _____

Lead pipes or solder? ☐ Yes ☐ No ☐ Don't know

Water sampled? ☐ Yes ☐ No

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ENVIRONMENTAL INVESTIGATION, CONT.

2. NUMBER OF ENVIRONMENTAL SAMPLES

	XRF			*Lab*						
	Paint	*Soil*	*Dust*	*Paint (AA)*	*Soil (AA)*	*Dust (AA)*	*Water*	*Test Kit*	*Other*	*TOTAL*
Total # of samples taken										
# above regulatory standard								# Positive:		

3. SUMMARY OF SOURCES OF EXPOSURE IDENTIFIED (See decision logic on page 17.)

4. ON-SITE RECOMMENDATIONS TO CHILD'S PARENT/GUARDIAN

5. DATE ENVIRONMENTAL SUMMARY FOR PCP SENT TO PHN: / /

6. DATE OF WRITTEN NOTIFICATION TO LANDLORD/PROPERTY OWNER : / /

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CLEARANCE INSPECTION — Summary Statement

Address sampled	*Date of referral* / /
City/County/Zip	*Date of environmental investigation* / /
Phone *Estimated year built*	*Date of summary statement* / /
Case Local ID#	*Environmental professional name*
Medi-Cal #	*I/A #* *Expiration date* / /
Persons present during clearance inspection	*Clearance date* / / *Time arrived at address* : *Time departed address* :
	Submitted by: ☐ REHS ☐ Private consultant ☐ CIH ☐ Other Environmental Professional
	Date of DHS Form 8552 submittal: / /

1. VISUAL INSPECTION

Exterior

☐ Exterior lead hazard work completed

Interior

☐ Interior lead hazard work completed

2. NUMBER OF ENVIRONMENTAL SAMPLES

	XRF		*Lab*		
	Soil	*Dust*	*Soil (AA)*	*Dust (AA)*	*TOTAL*
Total # of samples taken					
# above regulatory standard					

3. CLEARANCE BY PRIVATE CONSULTANT

Consultant name *Address* *Phone*

DHS Inspector/Assessor # *Certification expiration* / /

4. ON-SITE RECOMMENDATIONS TO CHILD'S PARENT/GUARDIAN TO MAINTAIN LEAD-SAFE PROPERTY

5. DATE OF NOTIFICATION TO LANDLORD/PROPERTY OWNER OF CLEARANCE / /

EXHIBIT M

Children Reported Having Blood Lead Levels of 4.5 µg/dL or Above in Los Angeles County in 2010-2014, by Census Tract*

Census Tract	Number	Percent	Cumulative Number	Cumulative Percent
101110	7	0.03	7	0.03
[redacted]				
101210	14	0.06	22	0.1
101220	8	0.04	30	0.13
[redacted]				
102102	6	0.03	46	0.21
[redacted]				
103102	7	0.03	55	0.25
[redacted]				
103400	5	0.02	67	0.3
104103	8	0.04	75	0.34
104104	5	0.02	80	0.36
104105	17	0.08	97	0.43
104106	15	0.07	112	0.5
104201	12	0.05	124	0.56
104202	30	0.13	154	0.69
104310	9	0.04	163	0.73
104320	19	0.09	182	0.81
104401	17	0.08	199	0.89
104402	19	0.09	218	0.98
104500	8	0.04	226	1.01
104610	14	0.06	240	1.07
104620	14	0.06	254	1.14
104701	13	0.06	267	1.2
104702	22	0.1	289	1.29
104810	10	0.04	299	1.34
104820	15	0.07	314	1.41
106010	5	0.02	319	1.43
106020	11	0.05	330	1.48
[redacted]				
106112	5	0.02	336	1.5
[redacted]				
106114	15	0.07	354	1.58
106402	14	0.06	368	1.65
106403	8	0.04	376	1.68
106404	8	0.04	384	1.72
106510	8	0.04	392	1.75
106520	9	0.04	401	1.79
106602	6	0.03	407	1.82
[redacted]				
106604	6	0.03	415	1.86
106605	13	0.06	428	1.92
[redacted]				
106643	7	0.03	438	1.96
[redacted]				
107020	14	0.06	456	2.04
[redacted]				
108200	9	0.04	475	2.13
109100	15	0.07	490	2.19
[redacted]				
109300	5	0.02	498	2.23
109400	11	0.05	509	2.28
[redacted]				
109602	5	0.02	521	2.33
109700	10	0.04	531	2.38
[redacted]				
111100	10	0.04	545	2.44
[redacted]				
111301	11	0.05	566	2.53
111302	5	0.02	571	2.56
111400	7	0.03	578	2.59

[redacted]				
113213	7	0.03	596	2.67
[redacted]				
113233	13	0.06	616	2.76
113234	8	0.04	624	2.79
[redacted]				
113321	10	0.04	636	2.85
[redacted]				
113401	13	0.06	652	2.92
113421	12	0.05	664	2.97
113422	8	0.04	672	3.01
[redacted]				
115102	5	0.02	678	3.03
115201	6	0.03	684	3.06
115202	7	0.03	691	3.09
[redacted]				
115302	12	0.05	706	3.16
115401	6	0.03	712	3.19
115402	19	0.09	731	3.27
117100	10	0.04	741	3.32
117200	9	0.04	750	3.36
[redacted]				
117302	8	0.04	762	3.41
117303	13	0.06	775	3.47
[redacted]				
117405	6	0.03	784	3.51
117406	18	0.08	802	3.59
117510	6	0.03	808	3.62
117520	12	0.05	820	3.67
[redacted]				
119000	9	0.04	833	3.73
119100	9	0.04	842	3.77
119200	6	0.03	848	3.8
119310	6	0.03	854	3.82
119320	5	0.02	859	3.85
119330	10	0.04	869	3.89
119340	14	0.06	883	3.95
119400	14	0.06	897	4.02
119700	7	0.03	904	4.05
119800	9	0.04	913	4.09
119900	10	0.04	923	4.13
120010	5	0.02	928	4.15
120020	13	0.06	941	4.21
120030	5	0.02	946	4.23
120101	13	0.06	959	4.29
120102	21	0.09	980	4.39
[redacted]				
120400	5	0.02	989	4.43
121010	11	0.05	1000	4.48
121020	5	0.02	1005	4.5
121100	15	0.07	1020	4.57
121210	11	0.05	1031	4.62
121220	13	0.06	1044	4.67
[redacted]				
121800	21	0.09	1068	4.78
121900	7	0.03	1075	4.81
[redacted]				
122110	13	0.06	1091	4.88
122120	13	0.06	1104	4.94
122200	23	0.1	1127	5.04
122410	7	0.03	1134	5.08
122420	9	0.04	1143	5.12
123010	18	0.08	1161	5.2
123020	8	0.04	1169	5.23
123103	11	0.05	1180	5.28
123104	10	0.04	1190	5.33
123203	7	0.03	1197	5.36
123204	7	0.03	1204	5.39
123205	7	0.03	1211	5.42
123206	7	0.03	1218	5.45
123301	7	0.03	1225	5.48

[redacted]				
123304	8	0.04	1237	5.54
123410	11	0.05	1248	5.59
123420	11	0.05	1259	5.64
123510	10	0.04	1269	5.68
123520	8	0.04	1277	5.72
123601	10	0.04	1287	5.76
123602	5	0.02	1292	5.78
[redacted]				
123800	10	0.04	1306	5.85
123900	12	0.05	1318	5.9
124000	8	0.04	1326	5.94
124101	15	0.07	1341	6
124102	7	0.03	1348	6.03
[redacted]				
124202	11	0.05	1362	6.1
124300	10	0.04	1372	6.14
124400	9	0.04	1381	6.18
124500	5	0.02	1386	6.2
124600	5	0.02	1391	6.23
124700	8	0.04	1399	6.26
124901	6	0.03	1405	6.29
125100	9	0.04	1414	6.33
[redacted]				
125310	5	0.02	1421	6.36
125320	10	0.04	1431	6.41
125400	6	0.03	1437	6.43
125500	7	0.03	1444	6.46
[redacted]				
127101	7	0.03	1453	6.5
127102	9	0.04	1462	6.54
127210	9	0.04	1471	6.58
127220	11	0.05	1482	6.63
127300	15	0.07	1497	6.7
127400	10	0.04	1507	6.75
127510	27	0.12	1534	6.87
127520	11	0.05	1545	6.92
127601	8	0.04	1553	6.95
127602	23	0.1	1576	7.05
127710	13	0.06	1589	7.11
127801	14	0.06	1603	7.18
127802	14	0.06	1617	7.24
127910	8	0.04	1625	7.27
127920	5	0.02	1630	7.3
128100	15	0.07	1645	7.36
128210	13	0.06	1658	7.42
128220	12	0.05	1670	7.48
128302	12	0.05	1682	7.53
128303	11	0.05	1693	7.58
128400	6	0.03	1699	7.61
[redacted]				
128600	14	0.06	1716	7.68
128702	14	0.06	1730	7.74
128800	12	0.05	1742	7.8
128910	8	0.04	1750	7.83
131010	18	0.08	1768	7.91
131020	11	0.05	1779	7.96
[redacted]				
131200	6	0.03	1789	8.01
131300	9	0.04	1798	8.05
131400	8	0.04	1806	8.08
131600	11	0.05	1817	8.13
131700	10	0.04	1827	8.18
131800	12	0.05	1839	8.23
131900	11	0.05	1850	8.28
132000	16	0.07	1866	8.35
132100	10	0.04	1876	8.4
132300	13	0.06	1889	8.46
132500	23	0.1	1912	8.56
132700	5	0.02	1917	8.58
132900	7	0.03	1924	8.61
133000	8	0.04	1932	8.65
[redacted]				
134000	19	0.09	1953	8.74
134101	6	0.03	1959	8.77

134103	8	0.04	1967	8.8
134104	8	0.04	1975	8.84
[redacted]				
134303	5	0.02	1983	8.88
134304	6	0.03	1989	8.9
134305	10	0.04	1999	8.95
[redacted]				
134422	5	0.02	2012	9.01
134510	19	0.09	2031	9.09
134520	17	0.08	2048	9.17
134710	11	0.05	2059	9.22
134720	7	0.03	2066	9.25
134800	7	0.03	2073	9.28
[redacted]				
134902	24	0.11	2100	9.4
[redacted]				
135111	5	0.02	2109	9.44
135112	12	0.05	2121	9.49
[redacted]				
135202	5	0.02	2130	9.53
[redacted]				
137000	5	0.02	2139	9.57
137102	12	0.05	2151	9.63
137201	7	0.03	2158	9.66
[redacted]				
137302	5	0.02	2167	9.7
137401	5	0.02	2172	9.72
[redacted]				
137501	10	0.04	2184	9.78
137502	9	0.04	2193	9.82
[redacted]				
138000	6	0.03	2201	9.85
139000	18	0.08	2219	9.93
139200	11	0.05	2230	9.98
139301	9	0.04	2239	10.02
139302	10	0.04	2249	10.07
139303	6	0.03	2255	10.09
139400	13	0.06	2268	10.15
139501	18	0.08	2286	10.23
139502	14	0.06	2300	10.3
139600	11	0.05	2311	10.34
139701	10	0.04	2321	10.39
139702	24	0.11	2345	10.5
139703	5	0.02	2350	10.52
139801	6	0.03	2356	10.55
139802	11	0.05	2367	10.6
141100	10	0.04	2377	10.64
141200	10	0.04	2387	10.68
141301	6	0.03	2393	10.71
141302	12	0.05	2405	10.77
141400	12	0.05	2417	10.82
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141600	6	0.03	2427	10.86
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143100	7	0.03	2438	10.91
143200	7	0.03	2445	10.94
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143400	8	0.04	2455	10.99
143500	9	0.04	2464	11.03
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143602	5	0.02	2471	11.06
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143800	6	0.03	2480	11.1
143901	9	0.04	2489	11.14
143902	6	0.03	2495	11.17
181000	14	0.06	2509	11.23
181300	7	0.03	2516	11.26
181400	8	0.04	2524	11.3
181500	10	0.04	2534	11.34
181600	7	0.03	2541	11.37
183101	13	0.06	2554	11.43
183102	14	0.06	2568	11.5
183210	12	0.05	2580	11.55

183220	8	0.04	2588	11.58
183300	11	0.05	2599	11.63
183400	10	0.04	2609	11.68
183510	6	0.03	2615	11.71
183520	14	0.06	2629	11.77
183610	15	0.07	2644	11.84
183620	9	0.04	2653	11.88
183700	12	0.05	2665	11.93
183810	12	0.05	2677	11.98
183820	11	0.05	2688	12.03
185100	19	0.09	2707	12.12
185201	18	0.08	2725	12.2
185202	13	0.06	2738	12.26
185310	7	0.03	2745	12.29
185320	9	0.04	2754	12.33
186100	9	0.04	2763	12.37
186200	15	0.07	2778	12.44
186300	13	0.06	2791	12.49
186401	15	0.07	2806	12.56
186402	14	0.06	2820	12.62
187100	20	0.09	2840	12.71
187200	20	0.09	2860	12.8
187300	5	0.02	2865	12.82
188100	6	0.03	2871	12.85
188200	8	0.04	2879	12.89
188300	6	0.03	2885	12.91
189100	24	0.11	2909	13.02
189200	14	0.06	2923	13.08
189300	14	0.06	2937	13.15
189400	5	0.02	2942	13.17
189500	9	0.04	2951	13.21
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189800	5	0.02	2964	13.27
189901	5	0.02	2969	13.29
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190200	7	0.03	2980	13.34
190301	9	0.04	2989	13.38
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190510	21	0.09	3014	13.49
190520	13	0.06	3027	13.55
190700	6	0.03	3033	13.58
190800	14	0.06	3047	13.64
190901	19	0.09	3066	13.72
190902	9	0.04	3075	13.76
191000	5	0.02	3080	13.79
191110	10	0.04	3090	13.83
191120	13	0.06	3103	13.89
191201	16	0.07	3119	13.96
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191204	8	0.04	3131	14.02
191300	17	0.08	3148	14.09
191410	17	0.08	3165	14.17
191420	15	0.07	3180	14.23
191500	20	0.09	3200	14.32
191610	28	0.13	3228	14.45
191620	12	0.05	3240	14.5
191710	12	0.05	3252	14.56
191720	18	0.08	3270	14.64
191810	16	0.07	3286	14.71
191820	8	0.04	3294	14.74
191900	6	0.03	3300	14.77
192000	5	0.02	3305	14.79
192300	5	0.02	3310	14.82
192410	8	0.04	3318	14.85
192420	9	0.04	3327	14.89
192510	14	0.06	3341	14.96
192520	18	0.08	3359	15.04
192610	18	0.08	3377	15.12
192620	13	0.06	3390	15.17
192700	13	0.06	3403	15.23
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194200	8	0.04	3415	15.29

195100	13	0.06	3435	15.38
195200	19	0.09	3454	15.46
195300	10	0.04	3464	15.51
195400	8	0.04	3472	15.54
195500	16	0.07	3488	15.61
195600	11	0.05	3499	15.66
195710	24	0.11	3523	15.77
195720	11	0.05	3534	15.82
195801	19	0.09	3553	15.9
195900	10	0.04	3566	15.96
197200	9	0.04	3576	16.01
197300	13	0.06	3589	16.07
197410	8	0.04	3597	16.1
197420	8	0.04	3605	16.14
197500	16	0.07	3621	16.21
197600	11	0.05	3632	16.26
197700	12	0.05	3644	16.31
199000	26	0.12	3670	16.43
199120	18	0.08	3692	16.53
199201	21	0.09	3713	16.62
199202	10	0.04	3723	16.67
199300	10	0.04	3733	16.71
199400	22	0.1	3755	16.81
199700	19	0.09	3774	16.89
199800	45	0.2	3819	17.09
199900	18	0.08	3837	17.18
201110	5	0.02	3842	17.2
201120	19	0.09	3861	17.28
201200	7	0.03	3868	17.31
201301	6	0.03	3874	17.34
201401	18	0.08	3896	17.44
201402	8	0.04	3904	17.48
201501	12	0.05	3916	17.53
201503	7	0.03	3923	17.56
201504	9	0.04	3932	17.6
201600	10	0.04	3942	17.65
203100	16	0.07	3961	17.73
203200	20	0.09	3981	17.82
203300	49	0.22	4030	18.04
203500	15	0.07	4045	18.11
203600	35	0.16	4080	18.26
203710	23	0.1	4103	18.37
203720	27	0.12	4130	18.49
203800	27	0.12	4157	18.61
203900	20	0.09	4177	18.7
204110	24	0.11	4201	18.8
204120	17	0.08	4218	18.88
204200	23	0.1	4241	18.98
204300	28	0.13	4269	19.11
204410	13	0.06	4282	19.17
204420	7	0.03	4289	19.2
204600	28	0.13	4317	19.32
204700	25	0.11	4342	19.44
204810	22	0.1	4364	19.53
204820	7	0.03	4371	19.57
204910	13	0.06	4384	19.62
204920	9	0.04	4393	19.66
205110	19	0.09	4412	19.75
205120	19	0.09	4431	19.83
206010	13	0.06	4444	19.89
206030	13	0.06	4458	19.96
206040	14	0.06	4472	20.02
206050	13	0.06	4485	20.08
206200	5	0.02	4490	20.1
207100	38	0.17	4531	20.28

207300	7	0.03	4538	20.31
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207710	5	0.02	4546	20.35
207900	7	0.03	4553	20.38
208000	25	0.11	4578	20.49
208300	35	0.16	4613	20.65
208400	39	0.17	4652	20.82
208500	55	0.25	4707	21.07
208610	18	0.08	4725	21.15
208620	15	0.07	4740	21.22
208710	14	0.06	4754	21.28
208720	38	0.17	4792	21.45
208800	27	0.12	4819	21.57
208902	21	0.09	4840	21.67
208903	28	0.13	4868	21.79
208904	35	0.16	4903	21.95
209101	44	0.2	4947	22.14
209102	38	0.17	4985	22.31
209200	12	0.05	4997	22.37
209300	18	0.08	5015	22.45
209401	16	0.07	5031	22.52
209402	43	0.19	5074	22.71
209403	24	0.11	5098	22.82
209510	17	0.08	5115	22.9
209520	34	0.15	5149	23.05
209810	15	0.07	5164	23.12
209820	63	0.28	5227	23.4
210010	33	0.15	5260	23.55
211000	5	0.02	5265	23.57
211110	22	0.1	5287	23.67
211120	26	0.12	5313	23.78
211200	31	0.14	5344	23.92
211310	30	0.13	5374	24.06
211320	19	0.09	5393	24.14
211410	9	0.04	5402	24.18
211420	21	0.09	5423	24.27
211500	14	0.06	5437	24.34
211701	8	0.04	5445	24.37
211702	29	0.13	5474	24.5
211801	18	0.08	5492	24.58
211802	11	0.05	5503	24.63
211910	32	0.14	5535	24.78
211920	31	0.14	5566	24.91
212100	19	0.09	5585	25
212202	17	0.08	5602	25.08
212203	16	0.07	5618	25.15
212204	19	0.09	5637	25.23
212303	20	0.09	5657	25.32
212304	9	0.04	5666	25.36
212305	21	0.09	5687	25.46
212306	11	0.05	5698	25.51
212410	11	0.05	5709	25.56
212420	13	0.06	5722	25.61
212500	14	0.06	5736	25.68
212610	7	0.03	5743	25.71
212620	9	0.04	5752	25.75
212700	8	0.04	5760	25.78
212800	20	0.09	5780	25.87
212900	15	0.07	5795	25.94
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213201	13	0.06	5812	26.02
213202	33	0.15	5845	26.16
213310	13	0.06	5858	26.22
213320	9	0.04	5867	26.26
213401	23	0.1	5890	26.37
213402	32	0.14	5922	26.51
214000	9	0.04	5931	26.55
214100	6	0.03	5937	26.58
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214500	18	0.08	5956	26.66
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214800	9	0.04	5971	26.73
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215100	7	0.03	5982	26.78
216100	6	0.03	5988	26.8
216200	13	0.06	6001	26.86
216300	6	0.03	6007	26.89
216400	9	0.04	6016	26.93
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216800	11	0.05	6029	26.99
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217000	10	0.04	6043	27.05
217100	11	0.05	6054	27.1
217200	7	0.03	6061	27.13
218110	15	0.07	6076	27.2
218120	23	0.1	6099	27.3
218210	16	0.07	6115	27.37
218220	22	0.1	6137	27.47
218300	22	0.1	6159	27.57
218400	14	0.06	6173	27.63
218500	12	0.05	6185	27.69
218600	32	0.14	6217	27.83
218700	13	0.06	6230	27.89
218800	12	0.05	6242	27.94
218900	31	0.14	6273	28.08
219010	21	0.09	6294	28.17
219020	23	0.1	6317	28.28
219300	7	0.03	6324	28.31
219700	13	0.06	6337	28.37
219800	13	0.06	6350	28.42
219900	21	0.09	6371	28.52
220000	16	0.07	6387	28.59
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221110	29	0.13	6420	28.74
221120	19	0.09	6439	28.82
221210	32	0.14	6471	28.97
221220	12	0.05	6483	29.02
221301	38	0.17	6521	29.19
221302	28	0.13	6549	29.32
221400	24	0.11	6573	29.42
221500	22	0.1	6595	29.52
221600	32	0.14	6627	29.66
221710	14	0.06	6641	29.73
221810	6	0.03	6647	29.75
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222000	48	0.21	6703	30
222100	18	0.08	6721	30.09
222200	19	0.09	6740	30.17
222500	34	0.15	6774	30.32
222600	29	0.13	6803	30.45
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224010	25	0.11	6829	30.57
224020	18	0.08	6847	30.65
224200	15	0.07	6862	30.72
224310	37	0.17	6899	30.88
224320	32	0.14	6931	31.03
224410	12	0.05	6943	31.08
224420	9	0.04	6952	31.12
224600	44	0.2	6996	31.32
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226000	37	0.17	7035	31.49
226410	49	0.22	7084	31.71
226420	49	0.22	7133	31.93
226700	74	0.33	7207	32.26
227010	45	0.2	7252	32.46
227020	28	0.13	7280	32.59
228100	54	0.24	7334	32.83
228210	31	0.14	7365	32.97
228220	43	0.19	7408	33.16
228310	28	0.13	7436	33.29
228320	22	0.1	7458	33.38
228410	50	0.22	7508	33.61
228420	47	0.21	7555	33.82
228500	80	0.36	7635	34.18
228600	48	0.21	7683	34.39
228710	42	0.19	7725	34.58
228720	36	0.16	7761	34.74

228800	48	0.21	7809	34.96
228900	39	0.17	7848	35.13
229100	60	0.27	7908	35.4
229200	44	0.2	7952	35.6
229300	65	0.29	8017	35.89
229410	46	0.21	8063	36.09
229420	58	0.26	8121	36.35
231100	10	0.04	8131	36.4
231210	16	0.07	8147	36.47
231220	22	0.1	8169	36.57
231300	26	0.12	8195	36.68
231400	17	0.08	8212	36.76
231500	19	0.09	8231	36.84
231600	54	0.24	8285	37.09
231710	54	0.24	8339	37.33
231720	42	0.19	8381	37.52
231800	62	0.28	8443	37.79
231900	73	0.33	8516	38.12
232110	33	0.15	8549	38.27
232120	40	0.18	8589	38.45
232200	27	0.12	8616	38.57
232300	40	0.18	8656	38.75
232400	46	0.21	8702	38.95
232500	30	0.13	8732	39.09
232600	31	0.14	8763	39.23
232700	39	0.17	8802	39.4
232800	64	0.29	8866	39.69
234000	7	0.03	8873	39.72
234200	5	0.02	8878	39.74
234300	5	0.02	8883	39.76
234500	25	0.11	8908	39.87
234600	26	0.12	8934	39.99
234700	16	0.07	8950	40.06
234800	14	0.06	8964	40.13
234900	29	0.13	8993	40.26
235100	6	0.03	8999	40.28
235201	7	0.03	9006	40.31
235202	14	0.06	9020	40.38
236000	8	0.04	9028	40.41
236100	19	0.09	9047	40.5
236201	26	0.12	9073	40.61
236202	23	0.1	9096	40.72
236400	6	0.03	9102	40.74
237100	68	0.3	9170	41.05
237200	39	0.17	9209	41.22
237300	26	0.12	9235	41.34
237400	42	0.19	9277	41.53
237500	28	0.13	9305	41.65
237600	52	0.23	9357	41.88
237710	26	0.12	9383	42
237720	35	0.16	9418	42.16
237800	17	0.08	9435	42.23
237900	11	0.05	9446	42.28
238000	19	0.09	9465	42.37
238100	12	0.05	9477	42.42
238200	28	0.13	9505	42.55
238310	39	0.17	9544	42.72
238320	32	0.14	9576	42.86
238400	12	0.05	9588	42.92
239200	82	0.37	9670	43.29
239310	20	0.09	9690	43.38
239320	33	0.15	9723	43.52
239330	19	0.09	9742	43.61
239500	51	0.23	9793	43.84
239600	63	0.28	9856	44.12
239700	59	0.26	9915	44.38
239800	56	0.25	9971	44.63
240010	25	0.11	9996	44.74
240020	32	0.14	10028	44.89
240200	45	0.2	10073	45.09
240300	35	0.16	10108	45.25
240400	24	0.11	10132	45.35
240500	39	0.17	10171	45.53
240600	33	0.15	10204	45.68
240700	25	0.11	10229	45.79

240800	29	0.13	10258	45.92
240900	24	0.11	10282	46.03
241000	32	0.14	10314	46.17
241110	16	0.07	10330	46.24
241120	28	0.13	10358	46.37
241200	27	0.12	10385	46.49
241300	12	0.05	10397	46.54
241400	20	0.09	10417	46.63
242000	36	0.16	10453	46.79
242100	6	0.03	10459	46.82
242200	40	0.18	10499	47
242300	24	0.11	10523	47.1
242600	24	0.11	10547	47.21
242700	36	0.16	10583	47.37
243000	47	0.21	10630	47.58
243100	30	0.13	10660	47.72
261101	5	0.02	10665	47.74
261102	6	0.03	10671	47.77
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262200	7	0.03	10680	47.81
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262800	5	0.02	10704	47.91
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265520	6	0.03	10728	48.02
265600	5	0.02	10733	48.04
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267100	5	0.02	10740	48.08
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267300	6	0.03	10750	48.12
267401	9	0.04	10759	48.16
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267501	9	0.04	10770	48.21
267502	9	0.04	10779	48.25
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267900	6	0.03	10791	48.3
269000	9	0.04	10800	48.34
269100	10	0.04	10810	48.39
269300	5	0.02	10815	48.41
269500	9	0.04	10824	48.45
269600	27	0.12	10851	48.57
269700	17	0.08	10868	48.65
269800	7	0.03	10875	48.68
269901	11	0.05	10886	48.73
269902	11	0.05	10897	48.78
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270200	10	0.04	10910	48.84
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271100	5	0.02	10918	48.87
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271801	11	0.05	10945	48.99
271802	8	0.04	10953	49.03
271900	10	0.04	10963	49.07
272100	5	0.02	10968	49.1

272200	15	0.07	10983	49.16
272301	8	0.04	10991	49.2
272302	10	0.04	11001	49.24
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273200	6	0.03	11008	49.27
273300	12	0.05	11020	49.33
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273500	5	0.02	11027	49.36
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273700	6	0.03	11036	49.4
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274200	5	0.02	11047	49.45
275100	11	0.05	11058	49.5
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275311	5	0.02	11069	49.55
275400	6	0.03	11075	49.57
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275601	16	0.07	11097	49.67
276000	6	0.03	11103	49.7
276100	7	0.03	11110	49.73
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276602	5	0.02	11123	49.79
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291110	11	0.05	11143	49.88
291120	6	0.03	11149	49.91
291130	8	0.04	11157	49.94
291210	6	0.03	11163	49.97
291220	7	0.03	11170	50
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292000	8	0.04	11180	50.04
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293202	12	0.05	11196	50.12
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293304	6	0.03	11207	50.17
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294200	5	0.02	11219	50.22
294300	14	0.06	11233	50.28
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294420	5	0.02	11240	50.31
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294520	10	0.04	11252	50.37
294610	6	0.03	11258	50.39
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294700	8	0.04	11269	50.44
294810	6	0.03	11275	50.47
294820	5	0.02	11280	50.49
294830	5	0.02	11285	50.51
294900	7	0.03	11292	50.55
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296210	6	0.03	11299	50.58
296220	6	0.03	11305	50.6
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296900	5	0.02	11320	50.67
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297110	10	0.04	11334	50.73
297120	6	0.03	11340	50.76
297200	5	0.02	11345	50.78
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300100	10	0.04	11358	50.84
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300400	5	0.02	11370	50.9

300501	6	0.03	11376	50.92
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300600	6	0.03	11385	50.96
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300702	6	0.03	11395	51.01
300800	10	0.04	11405	51.05
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301202	8	0.04	11433	51.18
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301602	6	0.03	11480	51.39
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311000	5	0.02	11694	52.35
311200	6	0.03	11700	52.37
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311600	8	0.04	11722	52.47
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320100	10	0.04	11747	52.58
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320300	7	0.03	11771	52.69
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401704	11	0.05	11920	53.36
401800	10	0.04	11930	53.4
401902	5	0.02	11935	53.42
402000	8	0.04	11943	53.46
402101	8	0.04	11951	53.5
402102	5	0.02	11956	53.52
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402302	26	0.12	11997	53.7
402401	14	0.06	12011	53.76
402402	12	0.05	12023	53.82
402403	6	0.03	12029	53.85
402501	18	0.08	12047	53.93
402502	12	0.05	12059	53.98
402600	26	0.12	12085	54.1
402702	27	0.12	12112	54.22
402703	6	0.03	12118	54.24
402704	12	0.05	12130	54.3
402801	24	0.11	12154	54.4
402802	25	0.11	12179	54.52
402901	14	0.06	12193	54.58
402902	11	0.05	12204	54.63
403000	17	0.08	12221	54.7
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403600	7	0.03	12331	55.2
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403801	14	0.06	12360	55.33
403802	6	0.03	12366	55.35
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403902	5	0.02	12374	55.39
404000	10	0.04	12384	55.43
404100	13	0.06	12397	55.49
404200	7	0.03	12404	55.52
404301	13	0.06	12417	55.58
404302	6	0.03	12423	55.61
404401	12	0.05	12435	55.66
404402	9	0.04	12444	55.7
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404702	16	0.07	12484	55.88
404703	5	0.02	12489	55.9
404801	17	0.08	12506	55.98
404802	8	0.04	12514	56.02
404901	12	0.05	12528	56.08
404902	7	0.03	12535	56.11
404903	11	0.05	12546	56.16
405001	11	0.05	12557	56.21
405002	9	0.04	12566	56.25
405101	10	0.04	12576	56.29
405102	18	0.08	12594	56.37
405201	14	0.06	12608	56.44
405202	14	0.06	12622	56.5
405203	10	0.04	12632	56.54
405300	10	0.04	12642	56.59
405400	5	0.02	12647	56.61
405500	7	0.03	12654	56.64
405700	14	0.06	12672	56.72
405800	6	0.03	12678	56.75
405900	7	0.03	12685	56.78
406000	9	0.04	12694	56.82
406300	6	0.03	12710	56.89
406500	6	0.03	12720	56.94
406602	10	0.04	12732	56.99
406700	12	0.05	12744	57.05
406800	5	0.02	12749	57.07
406900	16	0.07	12765	57.14
407001	21	0.09	12786	57.23
407002	7	0.03	12793	57.26
407101	7	0.03	12800	57.3
407102	14	0.06	12814	57.36
407200	9	0.04	12823	57.4
407301	6	0.03	12829	57.43
407302	8	0.04	12837	57.46
407400	5	0.02	12842	57.48
407500	26	0.12	12868	57.6
407600	15	0.07	12883	57.67
407701	10	0.04	12893	57.71
407702	12	0.05	12905	57.77
407800	13	0.06	12918	57.82
407900	9	0.04	12927	57.86
408001	13	0.06	12940	57.92
408101	12	0.05	12956	57.99
408102	22	0.1	12978	58.09
408132	19	0.09	12997	58.18
408133	9	0.04	13006	58.22
408211	15	0.07	13030	58.33
408212	8	0.04	13038	58.36
408301	18	0.08	13056	58.44
408302	8	0.04	13064	58.48
408401	8	0.04	13074	58.52
408402	6	0.03	13080	58.55
408501	6	0.03	13086	58.58
408502	19	0.09	13105	58.66
408601	13	0.06	13122	58.74
408625	5	0.02	13133	58.79
408626	14	0.06	13147	58.85

408628	8	0.04	13159	58.9
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408704	9	0.04	13173	58.97
408705	11	0.05	13184	59.02
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408722	6	0.03	13214	59.15
408800	27	0.12	13241	59.27
430001	8	0.04	13249	59.31
430002	17	0.08	13266	59.38
430101	12	0.05	13278	59.44
430102	11	0.05	13289	59.49
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430301	11	0.05	13301	59.54
430302	26	0.12	13327	59.66
430400	18	0.08	13345	59.74
430501	6	0.03	13351	59.76
430502	26	0.12	13377	59.88
430600	6	0.03	13383	59.91
430701	16	0.07	13399	59.98
430721	6	0.03	13405	60
430723	11	0.05	13416	60.05
430724	15	0.07	13431	60.12
430801	29	0.13	13460	60.25
430802	22	0.1	13482	60.35
430803	13	0.06	13495	60.41
430900	27	0.12	13522	60.53
431001	23	0.1	13545	60.63
431002	18	0.08	13563	60.71
431100	33	0.15	13596	60.86
431200	17	0.08	13613	60.94
431300	7	0.03	13620	60.97
431400	17	0.08	13637	61.04
431500	24	0.11	13661	61.15
431600	13	0.06	13674	61.21
431700	25	0.11	13699	61.32
431800	21	0.09	13720	61.41
431900	10	0.04	13730	61.46
432000	26	0.12	13756	61.58
432101	19	0.09	13775	61.66
432102	20	0.09	13795	61.75
432201	15	0.07	13810	61.82
432202	25	0.11	13835	61.93
432300	20	0.09	13855	62.02
432401	30	0.13	13885	62.15
432402	41	0.18	13926	62.34
432500	22	0.1	13948	62.44
432601	32	0.14	13980	62.58
432602	14	0.06	13994	62.64
432700	24	0.11	14018	62.75
432801	15	0.07	14033	62.82
432802	32	0.14	14065	62.96
432901	32	0.14	14097	63.1
432902	17	0.08	14114	63.18
433100	46	0.21	14160	63.38
433200	41	0.18	14201	63.57
433301	47	0.21	14248	63.78
433302	9	0.04	14257	63.82
433303	31	0.14	14288	63.96
433401	17	0.08	14305	64.03
433402	31	0.14	14336	64.17
433403	25	0.11	14361	64.28
433501	26	0.12	14387	64.4
433502	46	0.21	14433	64.61
433601	33	0.15	14466	64.75
433602	98	0.44	14564	65.19
433700	7	0.03	14571	65.22
433801	47	0.21	14618	65.43
433802	12	0.05	14630	65.49
433901	31	0.14	14661	65.63
433902	23	0.1	14684	65.73
434001	19	0.09	14703	65.81
434002	29	0.13	14732	65.94
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460301	10	0.04	14762	66.08
460302	6	0.03	14768	66.11
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460502	11	0.05	14786	66.19
460600	6	0.03	14792	66.21
460700	10	0.04	14802	66.26
461000	20	0.09	14822	66.35
461100	11	0.05	14833	66.4
461200	9	0.04	14842	66.44
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480011	28	0.13	14936	66.86
480012	18	0.08	14954	66.94
480101	10	0.04	14964	66.98
480102	22	0.1	14986	67.08
480201	11	0.05	14997	67.13
480202	9	0.04	15006	67.17
480301	32	0.14	15038	67.31
480302	16	0.07	15054	67.39
480400	11	0.05	15065	67.44
480500	20	0.09	15085	67.52
480600	28	0.13	15113	67.65
480702	11	0.05	15124	67.7
480703	8	0.04	15132	67.74
480704	11	0.05	15143	67.78
480802	8	0.04	15151	67.82
480803	14	0.06	15165	67.88
480804	21	0.09	15186	67.98
480901	15	0.07	15201	68.04
480902	20	0.09	15221	68.13
480903	12	0.05	15233	68.19
481001	12	0.05	15245	68.24
481002	15	0.07	15260	68.31
481101	17	0.08	15277	68.38
481102	10	0.04	15287	68.43
481103	27	0.12	15314	68.55
481201	17	0.08	15331	68.63
481202	28	0.13	15359	68.75
481300	14	0.06	15373	68.81
481401	34	0.15	15407	68.97
481402	38	0.17	15445	69.14
481500	21	0.09	15466	69.23
481602	45	0.2	15511	69.43
481603	18	0.08	15529	69.51
481604	9	0.04	15538	69.55
481711	22	0.1	15560	69.65
481712	21	0.09	15581	69.74
481713	14	0.06	15595	69.81
481714	7	0.03	15602	69.84
481800	6	0.03	15608	69.87
481901	16	0.07	15624	69.94
481902	10	0.04	15634	69.98
482001	5	0.02	15639	70
482002	23	0.1	15662	70.11
482101	21	0.09	15683	70.2
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482202	24	0.11	15720	70.37
482301	34	0.15	15754	70.52
482303	62	0.28	15816	70.8
482304	41	0.18	15857	70.98
482401	25	0.11	15882	71.09
482402	44	0.2	15926	71.29
482502	31	0.14	15957	71.43
482503	51	0.23	16008	71.66

482521	27	0.12	16035	71.78
482522	8	0.04	16043	71.81
482600	28	0.13	16071	71.94
482701	12	0.05	16083	71.99
482702	5	0.02	16088	72.01
482800	9	0.04	16097	72.05
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500402	15	0.07	16136	72.23
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500700	11	0.05	16162	72.35
500800	5	0.02	16167	72.37
500900	9	0.04	16176	72.41
501000	17	0.08	16193	72.48
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501400	6	0.03	16217	72.59
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501504	6	0.03	16227	72.64
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501801	14	0.06	16248	72.73
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502001	6	0.03	16263	72.8
502002	10	0.04	16273	72.84
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502302	5	0.02	16314	73.03
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502500	10	0.04	16332	73.11
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502602	7	0.03	16345	73.16
502700	5	0.02	16350	73.19
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502902	6	0.03	16365	73.25
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503101	5	0.02	16381	73.33
503102	14	0.06	16395	73.39
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503301	6	0.03	16409	73.45
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530101	11	0.05	16490	73.81
530102	7	0.03	16497	73.85
530202	10	0.04	16507	73.89
530203	5	0.02	16512	73.91
530204	7	0.03	16519	73.94
530301	8	0.04	16527	73.98

530302	10	0.04	16537	74.02
530400	9	0.04	16546	74.06
530500	19	0.09	16565	74.15
530601	6	0.03	16571	74.18
530602	10	0.04	16581	74.22
530700	5	0.02	16586	74.24
530801	30	0.13	16616	74.38
530802	14	0.06	16630	74.44
530901	33	0.15	16663	74.59
530902	20	0.09	16683	74.68
531000	35	0.16	16718	74.83
531101	37	0.17	16755	75
531102	25	0.11	16780	75.11
531201	36	0.16	16816	75.27
531202	21	0.09	16837	75.37
531301	37	0.17	16874	75.53
531302	30	0.13	16904	75.67
531501	35	0.16	16939	75.82
531502	13	0.06	16952	75.88
531602	11	0.05	16963	75.93
531603	15	0.07	16978	76
531604	15	0.07	16993	76.07
531701	24	0.11	17017	76.17
531702	8	0.04	17025	76.21
531800	24	0.11	17049	76.32
531901	16	0.07	17065	76.39
531902	13	0.06	17078	76.45
532001	5	0.02	17083	76.47
532002	5	0.02	17088	76.49
532101	15	0.07	17103	76.56
532102	9	0.04	17112	76.6
532200	12	0.05	17124	76.65
532302	13	0.06	17137	76.71
532303	7	0.03	17144	76.74
532304	9	0.04	17153	76.78
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532603	21	0.09	17197	76.98
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532605	8	0.04	17221	77.09
532606	28	0.13	17249	77.21
532700	25	0.11	17274	77.32
532800	40	0.18	17314	77.5
532900	51	0.23	17365	77.73
533000	57	0.26	17422	77.99
533103	19	0.09	17441	78.07
533104	31	0.14	17472	78.21
533105	25	0.11	17497	78.32
533106	8	0.04	17505	78.36
533107	42	0.19	17547	78.55
533201	10	0.04	17557	78.59
533202	14	0.06	17571	78.65
533203	11	0.05	17582	78.7
533300	20	0.09	17602	78.79
533401	27	0.12	17629	78.91
533402	20	0.09	17649	79
533403	23	0.1	17672	79.1
533501	15	0.07	17687	79.17
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533601	18	0.08	17716	79.3
533602	32	0.14	17748	79.44
533603	26	0.12	17774	79.56
533701	20	0.09	17794	79.65
533702	16	0.07	17810	79.72
533703	12	0.05	17822	79.78
533801	32	0.14	17854	79.92
533803	17	0.08	17871	80
533804	20	0.09	17891	80.09
533901	15	0.07	17906	80.15
533902	13	0.06	17919	80.21
534001	17	0.08	17936	80.29
534002	9	0.04	17945	80.33
534101	9	0.04	17954	80.37
534102	22	0.1	17976	80.47

534201	12	0.05	17988	80.52
534202	19	0.09	18007	80.6
534203	9	0.04	18016	80.64
534301	25	0.11	18041	80.76
534302	19	0.09	18060	80.84
534403	25	0.11	18085	80.95
534404	23	0.1	18108	81.06
534405	17	0.08	18125	81.13
534406	22	0.1	18147	81.23
534501	37	0.17	18184	81.4
534502	19	0.09	18203	81.48
534700	22	0.1	18225	81.58
534802	7	0.03	18232	81.61
534803	30	0.13	18262	81.75
534804	23	0.1	18285	81.85
534900	50	0.22	18335	82.07
535000	52	0.23	18387	82.31
535101	49	0.22	18436	82.52
535102	32	0.14	18468	82.67
535200	38	0.17	18506	82.84
535300	46	0.21	18552	83.04
535400	28	0.13	18580	83.17
535501	31	0.14	18611	83.31
535502	38	0.17	18649	83.48
535503	12	0.05	18661	83.53
535603	18	0.08	18679	83.61
535604	19	0.09	18698	83.7
535605	14	0.06	18712	83.76
535606	16	0.07	18728	83.83
535607	24	0.11	18752	83.94
535701	22	0.1	18774	84.04
535702	24	0.11	18798	84.15
535802	26	0.12	18824	84.26
535803	12	0.05	18836	84.32
535804	21	0.09	18857	84.41
535901	14	0.06	18871	84.47
535902	11	0.05	18882	84.52
536000	13	0.06	18895	84.58
536101	27	0.12	18922	84.7
[redacted]				
536200	10	0.04	18933	84.75
540000	26	0.12	18959	84.87
540101	23	0.1	18982	84.97
540102	14	0.06	18996	85.03
540201	14	0.06	19010	85.09
540202	27	0.12	19037	85.21
540203	18	0.08	19055	85.3
540300	17	0.08	19072	85.37
540400	17	0.08	19089	85.45
540501	23	0.1	19112	85.55
540502	22	0.1	19134	85.65
540600	20	0.09	19154	85.74
540700	14	0.06	19168	85.8
540800	14	0.06	19182	85.86
540901	16	0.07	19198	85.94
540902	7	0.03	19205	85.97
[redacted]				
541300	34	0.15	19251	86.17
541400	28	0.13	19279	86.3
541500	31	0.14	19310	86.44
541603	15	0.07	19325	86.5
541604	28	0.13	19353	86.63
541605	28	0.13	19381	86.75
541606	13	0.06	19394	86.81
541700	22	0.1	19416	86.91
541801	7	0.03	19423	86.94
541802	15	0.07	19438	87.01
542000	29	0.13	19467	87.14
542101	26	0.12	19493	87.26
542102	36	0.16	19529	87.42
542200	20	0.09	19549	87.51
542401	15	0.07	19564	87.57

542402	6	0.03	19570	87.6
542501	9	0.04	19579	87.64
542502	14	0.06	19593	87.7
542601	9	0.04	19602	87.74
542602	24	0.11	19626	87.85
542700	13	0.06	19639	87.91
[redacted]				
542900	9	0.04	19651	87.96
543000	5	0.02	19656	87.99
543100	16	0.07	19672	88.06
543202	19	0.09	19691	88.14
543303	7	0.03	19698	88.17
[redacted]				
543321	7	0.03	19711	88.23
[redacted]				
543400	5	0.02	19718	88.26
[redacted]				
543602	5	0.02	19732	88.33
[redacted]				
550200	15	0.07	19773	88.51
550300	10	0.04	19783	88.55
[redacted]				
550500	6	0.03	19790	88.59
550600	19	0.09	19809	88.67
550700	6	0.03	19815	88.7
[redacted]				
550900	12	0.05	19830	88.76
551000	5	0.02	19835	88.79
551100	20	0.09	19855	88.88
[redacted]				
551202	7	0.03	19864	88.92
551300	6	0.03	19870	88.94
551400	9	0.04	19879	88.98
551500	12	0.05	19891	89.04
551700	13	0.06	19904	89.1
551800	12	0.05	19916	89.15
551900	6	0.03	19922	89.18
552000	5	0.02	19927	89.2
[redacted]				
552200	7	0.03	19936	89.24
552300	7	0.03	19943	89.27
552400	7	0.03	19950	89.3
552601	9	0.04	19959	89.34
[redacted]				
552700	9	0.04	19971	89.4
552800	8	0.04	19979	89.43
552900	8	0.04	19987	89.47
[redacted]				
553100	12	0.05	20002	89.53
[redacted]				
553300	12	0.05	20018	89.61
[redacted]				
553501	18	0.08	20040	89.7
553502	6	0.03	20046	89.73
553601	5	0.02	20051	89.75
553602	7	0.03	20058	89.79
[redacted]				
553702	11	0.05	20073	89.85
553801	8	0.04	20081	89.89
553802	11	0.05	20092	89.94
553901	16	0.07	20108	90.01

553902	9	0.04	20117	90.05
554001	8	0.04	20125	90.09
554002	16	0.07	20141	90.16
554101	8	0.04	20149	90.19
554102	17	0.08	20166	90.27
554201	5	0.02	20171	90.29
554202	9	0.04	20180	90.33
554300	11	0.05	20191	90.38
[redacted]				
554403	7	0.03	20200	90.42
554404	7	0.03	20207	90.45
[redacted]				
554900	11	0.05	20249	90.64
555001	5	0.02	20254	90.66
[redacted]				
555102	9	0.04	20265	90.71
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555211	6	0.03	20276	90.76
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570901	5	0.02	20303	90.88
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573402	6	0.03	20329	91
[redacted]				
600100	29	0.13	20366	91.16
600201	12	0.05	20378	91.22
600202	23	0.1	20401	91.32
600301	25	0.11	20426	91.43
600302	9	0.04	20435	91.47
[redacted]				
600602	14	0.06	20462	91.59
[redacted]				
600801	5	0.02	20474	91.65

[redacted]				
600902	12	0.05	20490	91.72
600911	17	0.08	20507	91.79
600912	15	0.07	20522	91.86
[redacted]				
601002	10	0.04	20534	91.92
601100	18	0.08	20552	92
601202	7	0.03	20559	92.03
601211	9	0.04	20568	92.07
601212	11	0.05	20579	92.12
[redacted]				
601302	11	0.05	20592	92.18
601303	13	0.06	20605	92.23
601401	6	0.03	20611	92.26
601402	9	0.04	20620	92.3
601501	12	0.05	20632	92.35
601502	7	0.03	20639	92.39
601600	17	0.08	20656	92.46
601700	26	0.12	20682	92.58
601801	13	0.06	20695	92.64
601802	22	0.1	20717	92.74
601900	17	0.08	20734	92.81
602002	8	0.04	20742	92.85
602003	14	0.06	20756	92.91
602004	10	0.04	20766	92.95
602103	31	0.14	20797	93.09
602104	32	0.14	20829	93.24
602105	17	0.08	20846	93.31
602106	19	0.09	20865	93.4
602200	13	0.06	20878	93.46
602301	12	0.05	20890	93.51
[redacted]				
602402	20	0.09	20911	93.6
602403	18	0.08	20929	93.68
602404	27	0.12	20956	93.8
602501	53	0.24	21009	94.04
602502	32	0.14	21041	94.19
602503	22	0.1	21063	94.28
602600	11	0.05	21074	94.33
602700	6	0.03	21080	94.36
602800	22	0.1	21102	94.46
602900	11	0.05	21113	94.51
603001	9	0.04	21122	94.55
603003	8	0.04	21130	94.58
[redacted]				
603102	9	0.04	21143	94.64
[redacted]				
603400	9	0.04	21153	94.69
603500	5	0.02	21158	94.71
[redacted]				
603704	22	0.1	21188	94.84
603800	12	0.05	21200	94.9
603900	19	0.09	21219	94.98
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604100	8	0.04	21241	95.08
[redacted]				

[redacted]				
650001	7	0.03	21290	95.3
[redacted]				
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650601	9	0.04	21318	95.43
650602	6	0.03	21324	95.45
[redacted]				
650902	7	0.03	21337	95.51
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[redacted]				
670100	5	0.02	21364	95.63
[redacted]				
700100	8	0.04	21381	95.71
[redacted]				
700400	5	0.02	21392	95.76
[redacted]				
700800	9	0.04	21408	95.83
700901	5	0.02	21413	95.85
700902	7	0.03	21420	95.88
701000	5	0.02	21425	95.9
[redacted]				
701701	5	0.02	21447	96
[redacted]				
702502	6	0.03	21484	96.17
702600	5	0.02	21489	96.19
[redacted]				
702803	12	0.05	21509	96.28
702901	5	0.02	21514	96.3
703001	13	0.06	21527	96.36
[redacted]				
703100	6	0.03	21537	96.41

703200	5	0.02	21542	96.43
[redacted]				
800201	6	0.03	21554	96.48
800202	8	0.04	21562	96.52
[redacted]				
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900101	15	0.07	21599	96.68
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900501	6	0.03	21611	96.74
900502	10	0.04	21621	96.78
900503	17	0.08	21638	96.86
900504	6	0.03	21644	96.88
900602	6	0.03	21650	96.91
900604	5	0.02	21655	96.93
900605	9	0.04	21664	96.97
[redacted]				
900607	5	0.02	21673	97.01
900701	5	0.02	21678	97.04
[redacted]				
900803	10	0.04	21695	97.11
[redacted]				
900805	6	0.03	21703	97.15
900806	6	0.03	21709	97.18
[redacted]				
901003	6	0.03	21719	97.22
[redacted]				
901005	6	0.03	21729	97.26
901006	7	0.03	21736	97.3
[redacted]				
901205	6	0.03	21748	97.35
[redacted]				
910000	14	0.06	21765	97.43
910100	6	0.03	21771	97.45
910201	6	0.03	21777	97.48
[redacted]				
910203	17	0.08	21795	97.56
910204	10	0.04	21805	97.61
[redacted]				
910301	5	0.02	21814	97.65
[redacted]				
910401	5	0.02	21821	97.68
910402	5	0.02	21826	97.7
[redacted]				
910404	6	0.03	21833	97.73
910501	8	0.04	21841	97.77
[redacted]				
910503	8	0.04	21850	97.81
910601	5	0.02	21855	97.83
[redacted]				
910603	7	0.03	21866	97.88
910604	16	0.07	21882	97.95
910703	11	0.05	21893	98
910704	8	0.04	21901	98.03
910705	23	0.1	21924	98.14
910706	10	0.04	21934	98.18
[redacted]				
910710	12	0.05	21950	98.25
910803	8	0.04	21958	98.29
[redacted]				

[redacted]				
910807	14	0.06	21976	98.37
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[redacted]				
910810	15	0.07	22000	98.48
[redacted]				
920017	6	0.03	22016	98.55
[redacted]				
920019	7	0.03	22026	98.59
920020	10	0.04	22036	98.64
920023	8	0.04	22044	98.68
920028	12	0.05	22056	98.73
920029	7	0.03	22063	98.76
920030	8	0.04	22071	98.8
920031	5	0.02	22076	98.82
920032	6	0.03	22082	98.85
[redacted]				
920034	13	0.06	22098	98.92
920035	17	0.08	22115	98.99
[redacted]				
920037	29	0.13	22148	99.14
920038	10	0.04	22158	99.19
[redacted]				
920040	9	0.04	22168	99.23
920041	13	0.06	22181	99.29
920042	19	0.09	22200	99.37
920043	15	0.07	22215	99.44
[redacted]				
920105	11	0.05	22232	99.52
[redacted]				
920113	9	0.04	22261	99.65
[redacted]				
920312	6	0.03	22268	99.68
920313	6	0.03	22274	99.7
[redacted]				
920326	9	0.04	22287	99.76
920327	11	0.05	22298	99.81
[redacted]				
920335	29	0.13	22338	99.99
[redacted]				

* Notes:

Age<21 years; total N=24,906, about 10% of addresses could not be geocoded and aggregated into census tracts, so were not included in the table.

Prepared by LAC/DPH/Childhood Lead Poisoning Prevention Program; September 2015.

Data source: data CD's provided by California Lead Poisoning Prevention Branch for the years 2010-2014.

EXHIBIT N

From: Neumeyer, Melanie (CDPH-EXEC-OLS) [mailto:Melanie.Neumeyer@cdph.ca.gov]
Sent: Friday, April 22, 2016 3:04 PM
To: James Chadwick
Subject: correction

Hi James,

Sorry, our program staff has corrected a misstatement in my prior email, please see the corrected response below:

On our April 15, 2016, call you asked for a data set that you believe provides information on individuals with high blood lead levels in LA County organized by Census Tract for the years 2010-2014. You stated that if CDPH was able to produce this record by Friday April 22, 2016, it may serve as a compromise to your request for the creation of a new data analysis/record.

CDPH has reviewed our records and we do not have the record you describe. As we discussed, LA County has access to their own, additional records, and may have created a record similar to the one you describe, but CDPH does not have the record.

CDPH is able to offer you data compiled for the data discs that were provided to LA county, for the years 2007 through 2015 which can be located, with information considered confidential or which allows identification of an individual redacted. This would include data for most of the information that you requested in the table which accompanied your letter of February 29, 2016. The data provided would include: the individual blood lead test; detection or reporting limit; date blood drawn; age of individual at date of blood draw; city of residence attributed; zip code attributed; and collection method.

The data would need to be pulled from multiple files, and be redacted appropriately. This would include some cities and zip codes, with limited numbers of tested individuals. We estimate it would take approximately a month and $6,317 as the estimated cost to produce these modified files.

Note that data disks are issued to local health jurisdictions, and there are three jurisdictions which are part of LA County which have data disks generated. These three jurisdictions are the cities of Long Beach and Pasadena and the remainder of LA County (without Long Beach and Pasadena). If you are not specifically interested in the Long Beach and Pasadena information, we should be able supply the other county information sooner.

CDPH would also like to address your more recent PRA request from April 1, 2016, for "all de-identified collection for records or datasets that CDPH has provided to any member of the public, and all correspondence and other documents describing such collections or datasets." We asked you on April 8 and April 12 to help clarify your request as it is currently written in a way that is overly broad and unduly burdensome for the department to respond to. CDPH therefore denies this request as overly broad and unduly burdensome. (Community Youth Athletic Center v. City of National City (2013) 220 Cal.App.4th 1385, 1425 ["An agency may legitimately raise an objection that a request is overbroad or unduly burdensome."].) As always, CDPH remains willing to work with you to help narrow the specific scope of your request, including a time frame and geographic location, so it becomes something that CDPH is able to agree to produce.

Sincerely,

Melanie Neumeyer
Attorney
California Department of Public Health
Office of Legal Services
1415 L Street, Suite 500, Sacramento, CA 95814
(916) 440-7356

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EXHIBIT O

From: James Chadwick
Sent: Saturday, April 23, 2016 1:22 PM
To: 'Neumeyer, Melanie (CDPH-EXEC-OLS)'
Subject: RE: correction

Dear Mr. Neumeyer:

Thank you for your message.

Unfortunately, it appears that the Department of Public Health and the CLPPB are unwilling to provide the records we have requested. As I am sure you recognize, the records you have indicated you would be willing to provide do not include some of the records we have specifically requested. Moreover, you continue to take the position that Exide's requests entail "the creation of a new data analysis/record." There is no reason to make this assertion except to indicate that it is your position the Exide is not legally entitled to the records it has requested. Thus, we understand that you are denying Exide's requests, and we will proceed accordingly.

I must also point out that these data disks, and other records responsive to Exide's original request (including the de-identified collections of records that CDPH has provided to the public that you refer to in your message), have existed since long before our original request in November of last year. However, CDPH refused to provide them for almost five months, and still refuses to provide many of the records we have requested. This is a constructive denial of access under the Public Records Act and the California Constitution, in addition to the explicit denial reflected in your most recent message.

I am very sorry that CDPH is unwilling to accommodate our requests for the public release of these records. This information is critical not only to Exide, but to every member of the public and every regulatory agency that seeks a sound scientific basis for assessing the presence of lead and its health effects in Los Angeles County. It is unfortunate indeed that we have not been able to persuade you to provide it.

From: Neumeyer, Melanie (CDPH-EXEC-OLS) [mailto:Melanie.Neumeyer@cdph.ca.gov]
Sent: Friday, April 22, 2016 3:04 PM
To: James Chadwick
Subject: correction

Hi James,

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Sincerely,

Melanie Neumeyer
Attorney
California Department of Public Health
Office of Legal Services
1415 L Street, Suite 500, Sacramento, CA 95814
(916) 440-7356

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