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1 done, sir?

2 A. When the major mechanical work was --

3 Q. The plumbing work, yes.

4 A. I would say that was during 1995, maybe

5 '96, school year, but I do not have documents in

6 front of me to give you an exact time.

7 Q. Okay. But you would estimate --

8 A. I'm just estimating that that is the

9 time frame that it was done.

10 Q. Okay. You said -- was it still in

11 progress, sir, when you came on?

12 A. Yes. It was phased renovation, and the

13 work had not been completed and there was still

14 parts of the building that had to be --

15 penetrations had to be made.

16 Q. When you mention the term penetration,

17 sir, could you explain that a little bit more?

18 A. Penetrations of the wall surfaces; wall,

19 floor surfaces.

20 Q. After these -- I'm sorry, sir.

21 So you're saying they penetrated the

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1 lead-based painted surfaces; is that what you're

2 saying?

3 A. No, that is not what I'm saying.

4 Q. I apologize. Could you explain that a

5 little bit more?

6 A. After the abatement was conducted by the

7 subcontractor for G.F. Tignall, the general

8 contractor and/or his other subcontractors,

9 whether they would be electrical or mechanical

10 made the penetrations based on the areas that

11 were abated.

12 Q. Why did the City hire lead abatement

13 contractors, sir?

14 A. From the previous statement, that

15 buildings from 1950 and above may have had

16 lead-based paint, but more so because we had

17 concern, as a result of some sampling that was

18 done to discern that there was lead dust on the

19 surfaces and in the lower level in the

20 contractors' area, that the levels were excess

21 and above the HUD guidelines.

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21 plumbing work was done -- and when was that job

20 Q. Sir, when the major mechanical --

19 MS. WILLIAMS: I apologize, I apologize.

18 MR. WIGGINS: He's already said no.

17 Q. Was he certified to do --

16 A. The general contractor was G.F. Tignall.

15 again, sir?

14 Q. What was the general contracting company

13 A. Yes.

12 than three square feet of lead-based paint?

11 do the job that required the disturbance of more

10 workers to make sure that they were certified to

9 check the certification or accreditation of the

8 Q. Sir, was part of your responsibility to

7 A. Building safety and education officer.

6 Q. What is your title again, sir?

5 for them.

4 facility. I don't have any reference materials

3 know the subcontractors, for that particular

2 A. I know the general contractor, I do not

1 Q. Yes, sir.

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21 A. We're talking about 456?

20 or reported dry scraping? I'm sorry.

19 the ceilings, and dry scraping of the ceiling --

18 mechanical, electrical, plumbing work, removal of

17 Q. What contracting company did the major

16 surfaces prior to opening.

15 areas to allow penetrations of the various

14 a certified company to conduct wet scraping of

13 A. The general contractor subcontracted to

12 their role in the renovation project?

11 Q. And what did they do, sir, in regard to

10 as lead abatement contractors.

9 lead-based certified -- they were not certified

8 contractor for this job I'm not -- they are not

7 A. That particular question for the general

6 on an affected property?

5 of the Environment to perform such lead abatement

4 certified and accredited by Maryland Department

3 you know whether or not these individuals were

2 contracting, the general contracting company, do

1 Q. Was the company that was hired to do the

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1 Q. Sir, maybe I -- I apologize. When were
2 the lead abatement contractors hired?
3 A. I have no idea. I don't have any
4 documents to give me a date. I do not remember.
5 It's been several years since the initial --
6 since that job was completed, and I do not
7 have --
8 MR. WIGGINS: Sir, you don't recall.
9 Let's move on.
10 Q. Mr. Elam, were you ever given any
11 correspondence from Dr. Amprey, who was the
12 Superintendent at that time, in regard to
13 problems or concerns resulting from the
14 disturbance of lead-based painted surfaces that
15 occurred during the summer of 1996; namely,
16 during July and August of 1996, have you ever
17 received any?
18 A. I can't recall whether I received
19 anything from Dr. Amprey.
20 Q. I'm just kind of puzzled here, sir.
21 You said you're the safety officer.

1 Dr. Amprey.
2 Your next question?
3 Q. Okay. Did you receive any documentation
4 from Dr. Amprey about James Mosher, Highlandtown
5 or Southeast Middle in regard to lead either in
6 the water or lead-based paint hazards in the
7 school?
8 A. I do not remember receiving anything
9 directly from Dr. Amprey on any of those
10 schools.
11 MR. WIGGINS: Let me ask you this,
12 because I want to be certain about something.
13 Had you received something from
14 Dr. Amprey, would you recall it?
15 A. If I could answer your question in a
16 different manner --
17 MR. WIGGINS: No, sir.
18 A. -- I would not necessarily receive --
19 remember receiving --
20 MR. WIGGINS: Mr. Elam, listen to me.
21 I'm the Hearing Examiner.

1 was as a result of asbestos in the building, and at that time we talked about the building management plan for asbestos.

2 at that time we talked about the building management plan for asbestos.

3 On subsequent occasions, you began to talk about lead-based paint, and at that time we didn't find documents identifying the lead-based paint in that facility.

4 Q. Sir, do you recall any doc -- seeing any documents saying that there was lead-based -- where Baltimore City had conducted lead-based paint sampling in 1993 and found lead-based paint to be throughout that facility in 1993?

5 A. In 1993 I do not remember seeing a document.

6 MR. WIGGINS: No, she didn't ask you if you saw it in 1993. She asked you did you see a document from samplings taken in 1993 that indicated that there was lead paint problems in the building.

7 A. I think that I do remember a document from 1993.

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9 THE WITNESS: Okay.

10 MR. WIGGINS: I ask the questions, you answer in response to my questions. Her question, I think, is very clear. All we need to know -- because she's asking about memorandums coming from Dr. Amprey, and you're saying you don't recall them.

11 A. I do not recall.

12 MR. WIGGINS: Okay. And my question to you is, as the safety officer for Baltimore City Public Schools, had you received memorandum from Dr. Amprey dealing with an issue that deals with the health and welfare of students, would you have recalled it?

13 A. If the time frame were closer to the time when Dr. Amprey was here, I may say yes, I could recall it, but it has been several years since Dr. Amprey has been here and there's too many schools in the system for me to recall a correspondence from him for one of those four schools. So, no, I would not recall it.

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15 MR. WIGGINS: The answer is no. Next question, Ms. Williams.

16 Q. Okay. Sir, do you recall ever meeting Ms. -- coming to Fairmount-Harford High School during the 1996-97 school year and meeting with Ms. Williams on several occasions?

17 A. Ms. Williams being you?

18 Q. Yes.

19 A. Yes.

20 Q. Do you remember Ms. Williams showing you in the hallways several sites where there were deteriorated paint all the way down to the plaster, as well as ceilings that had been -- drop ceilings that had been removed, do you recall, sir?

21 A. I remember coming to the facility, and the original complaint from you, Ms. Williams,

22 the original complaint from you, Ms. Williams, Toll Free: (888) 821-4888 Fax: (410) 831-0800

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1 dated November 14th, 1996, a memo from Walter Amprey to Council President Lawrence Bell, which was cc'd to Mr. Elam.
 2 MR. WIGGINS: We'll mark for identification as CEO Exhibit Number 14 a memorandum from Walter G. Amprey to Council President Lawrence Bell dated the 14th of November 1996.
 3 (Whereupon, CEO Exhibit No. 14 marked.)
 4 EXAMINATION BY MS. HASKINS:
 5 Q. Mr. Elam, could you please identify the document?
 6 A. Yes. It's a document that I drafted for the Superintendent by Wilbur Giles informing the Council President of the Fairmount-Hartford project and the assessments that were being done relative to lead dust samples and the effects of the Fairmount-Hartford students and faculty and staff at this particular facility.
 7 Q. Mr. Elam, I'm sorry, did you say that you drafted the letter yourself?

1 A. Yes. It doesn't show on the document, WGA:WCG, but, in routine, I draft the document for my superior, who is Wilbur Giles.
 2 Q. Okay. Based on the questions that Ms. Williams asked you regarding this project, could you please briefly summarize for us the 7 topics you discussed in this memo and the 8 results, if any?
 9 A. We coordinated with the City of Baltimore's Office of Safety and Sports Stevens, which was an independent industrial hygiene 11 company, to do an assessment of the building to 12 discern if there was a problem with lead dust as a result of the construction in the facility.
 13 On October the 10th and 11th, Sports, Stevens, and McCoy, without direction, in terms 16 of where to sample, how many samples to take, 17 took these samples, 45 samples, throughout the 18 Fairmount-Hartford facility.
 19 I don't have the locations, but they 20 identify three samples in the occupied space 21

1 saying, until October of 1996?
 2 A. I can't confirm that.
 3 Q. Sir, had you informed them prior to October of 1996?
 4 A. I did not, because I was not a part of the school system when this job started.
 5 Q. Okay. Since you have been on board, 8 sir, as the safety officer, what have you done to 9 inform the staff or what had you done in the 10 past --
 11 MR. WIGGINS: That's not relevant.
 12 Next question.
 13 Q. -- at Fairmount-Hartford --
 14 MR. WIGGINS: Next question.
 15 MS. WILLIAMS: No further questions at this time.
 16 MR. WIGGINS: Ms. Haskins, redirect?
 17 MS. HASKINS: Yes. I have a --
 18 MR. WIGGINS: Let's do this. It's 20 12:30. Let's take an hour -- is an hour 21 sufficient, Ms. Holmes?

1 MS. HOLMES: We'll make it.
 2 MR. WIGGINS: Let's take an hour and 15 3 minute break for lunch and then we will resume 4 with our redirect of Mr. Elam. Mr. Elam, do not 5 discuss your testimony with anyone.
 6 Yes, Ms. Haskins?
 7 MS. HASKINS: Mr. Wiggins, this was the 8 last question for Mr. Elam. We have to go for 9 lunch?
 10 MR. WIGGINS: From you. So we're 11 breaking now.
 12 MS. HASKINS: I don't want to lose the 13 thing.
 14 MR. WIGGINS: Write it down.
 15 MS. HASKINS: Okay.
 16 (Luncheon recess -- 12:29 p.m.)
 17 (Afternoon session -- 1:49 p.m.)
 18 MR. WIGGINS: We're back on the record 19 and Ms. Haskins is getting ready to do a redirect 20 of Mr. Elam. Ms. Haskins?
 21 MS. HASKINS: Okay. I have a document

1 which were above the recommended levels by HUD,
 2 The basement was the highest level at that point,
 3 one was on top of a locker, and one was on a
 4 window sill somewhere, I think, on the second or
 5 third floor.
 6 At that time, recognizing that we found
 7 at least one sample that was above the
 8 guidelines, we would have to do one of two
 9 things. We would either have to sample the
 10 entire building or get a contractor in to clean
 11 the building according to HUD guidelines, and we
 12 did the latter, we cleaned the entire facility to
 13 bring the lead levels down to an acceptable range
 14 for the occupants in the facility.
 15 Q. Okay, Mr. Elam, in reference to the
 16 Head Start students, what was done at the time of
 17 this memo?
 18 A. Because of our concern that Head Start
 19 students were in the facility and they being at
 20 an age that was at risk, we elected to contract
 21 with Kennedy Krieger, through Dr. Cecilia Davoli,

1 to conduct lead assessments of the -- lead paint
 2 exposures for those students in the facility,
 3 even though Maryland State Department of Human
 4 Resources, as I indicated before, has certified
 5 the area where the Head Start Program was
 6 occupied in the facility was lead safe.
 7 Q. Mr. Elam, in the last paragraph on this
 8 first page it discusses the variance you had
 9 mentioned in response to Ms. Williams' questions.
 10 Could you please explain the variance
 11 requirement?
 12 A. The variance that was required for lead
 13 paint abatement was something that was
 14 interpreted through a document from MDE, Maryland
 15 Department of the Environment, where an
 16 individual conducting lead-based paint abatement
 17 in a -- actually, they indicated in a housing
 18 facility required that they maintain a separation
 19 by distance and containment.
 20 We wanted to make sure that we were
 21 approved to do this lead abatement for the

1 facility under protocols established by MDE, and
 2 that's what I was saying relative to a variance
 3 for that particular purpose.
 4 Q. Were the occupants separated from the
 5 construction by distance and containment?
 6 A. Yes. Again, I don't remember the
 7 contractor, but the facility was under full
 8 containment during the abatement and all
 9 protocols established by MDE were maintained, and
 10 we monitored the facility to make sure that those
 11 containments were in place and that they provided
 12 negative air to prevent any of the dust getting
 13 into the area where the occupants were existing.
 14 MS. HASKINS: Thank you, I don't have
 15 any more questions for Mr. Elam.
 16 MR. WIGGINS: Ms. Williams, recross?
 17 MS. WILLIAMS: I'd like to --
 18 MS. HASKINS: I'm sorry, I forgot to
 19 move the document into evidence, please.
 20 MR. WIGGINS: Any objections,
 21 Ms. Williams?

1 MS. WILLIAMS: No, sir.
 2 MR. WIGGINS: Okay. It's in. Now,
 3 Ms. Williams?
 4 MS. WILLIAMS: Yes. I'd like to reserve
 5 the possibility of Mr. Elam for later
 6 questioning, please.
 7 MR. WIGGINS: Okay. You don't want to
 8 recross him now?
 9 MS. WILLIAMS: Not right at this moment,
 10 sir.
 11 MR. WIGGINS: Okay. Let me ask you a
 12 few questions, Mr. Elam, because I want to make
 13 sure I understand the sequence of events.
 14 The construction was started when, to
 15 the best of your knowledge?
 16 A. I would think that the original
 17 construction for this particular facility
 18 probably started in the latter part of '95 and --
 19 go ahead.
 20 MR. WIGGINS: You had a meeting with the
 21 people at Fairmount-Hartford High School and Ms.

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1 Williams. When was that meeting?
 2 A. In about August of 1996, I think. If
 3 not August, it was probably September, because I
 4 vaguely remember the school being -- the students
 5 being in the facility.
 6 MR. WIGGINS: Okay.
 7 A. I was called by --
 8 MR. WIGGINS: I just wanted to know
 9 when.
 10 A. I think that was about September of '96.
 11 MR. WIGGINS: The sampling that was
 12 taken which found that there may have been three
 13 places where there was lead and that there might
 14 have been lead above the allowable level, that
 15 was done when?
 16 A. That was completed on October 10th and
 17 11th, 1996.
 18 MR. WIGGINS: So that would have
 19 occurred after your meeting with Ms. Williams?
 20 A. Yes.
 21 MR. WIGGINS: The variance that you

1 occurred because they discovered -- the sampling
 2 discovered a higher level than allowed, correct?
 3 A. Their sampling -- yes, on a window and
 4 on the top of a locker and in the basement, which
 5 was not where the students were.
 6 MR. WIGGINS: Questions on my questions,
 7 Ms. Haskins?
 8 EXAMINATION BY MS. HASKINS:
 9 Q. Mr. Elam, could you please distinguish
 10 between -- it says in the last paragraph the
 11 construction contractor, who will submit a
 12 protocol for a variance.
 13 Could you please distinguish for us
 14 what the difference is between submitting a
 15 protocol at this particular time and whether or
 16 not when you first became involved with this
 17 project there was any variance in place?
 18 A. Can you repeat the question?
 19 MR. WIGGINS: I think her question is
 20 was there a variance already in place when you
 21 first became involved with the project.

1 spoke of with regards to the construction, that
 2 was also done after the meeting with
 3 Ms. Williams?
 4 A. Yes.
 5 MR. WIGGINS: So in her initial
 6 questions to you on direct -- I'm sorry -- on
 7 cross when she asked whether work was being done
 8 while the children were in the facility, and you
 9 said that a variance was in place, it wasn't in
 10 place when the work was initially done; is that
 11 correct, sir?
 12 A. The work that I --
 13 MR. WIGGINS: The variance was not in
 14 place when the work was initially done?
 15 A. No, that's not correct.
 16 MR. WIGGINS: Well, it says here that a
 17 variance --
 18 A. That's what I'm trying to discern. Are
 19 you talking about the construction or are you
 20 talking about the lead abatement?
 21 MR. WIGGINS: Well, the lead abatement

1 A. No, there was no lead abatement in
 2 process at that time.
 3 MR. WIGGINS: When was the first
 4 variance for the lead abatement process?
 5 A. After we identified that the areas by
 6 Spotts, Stevens, and McCoy had samples above the
 7 HUD guidelines.
 8 MR. WIGGINS: And that was in October of
 9 1996?
 10 A. That was October 1996.
 11 MR. WIGGINS: Questions on my questions
 12 again, Ms. Haskins?
 13 MS. HASKINS: No, sir.
 14 MR. WIGGINS: Questions on my questions,
 15 Ms. Williams?
 16 MS. WILLIAMS: No, sir.
 17 MR. WIGGINS: You want to reserve the
 18 right to recall him?
 19 MS. WILLIAMS: Yes, sir.
 20 MR. WIGGINS: I'm going to allow you,
 21 like the others, to leave, but I need for you to

1 leave us with a number where we can contact you
 2 in case we have to bring you back for further
 3 testimony, sir.
 4 THE WITNESS: Is there a timeline for a
 5 response?
 6 MR. WIGGINS: No. I mean, it will be
 7 today or, if not today, then they will notify you
 8 as to when you might need to come back.
 9 THE WITNESS: Then you best take my
 10 pager number. 407-6099.
 11 MS. HASKINS: That's 410?
 12 THE WITNESS: 410. I'm en route to
 13 Southwestern. I have some training going on.
 14 MR. WIGGINS: Okay.
 15 MS. HASKINS: Thank you, Mr. Elam.
 16 MR. WIGGINS: Next witness,
 17 Ms. Haskins?
 18 MS. HASKINS: I don't have any more
 19 witnesses.
 20 MR. WIGGINS: Okay. Ms. Williams, are
 21 you ready to put on your case?

1 MS. WILLIAMS: Yes, sir. I'd like to
 2 call Ms. Williams.
 3 MS. HASKINS: Ms. Holmes had a call to
 4 go to court, so she's gone.
 5 MR. WIGGINS: Well, Ms. Holmes wasn't
 6 going to testify, right?
 7 MS. HASKINS: No. I just --
 8 MR. WIGGINS: That's fine. You're going
 9 to call who?
 10 MS. WILLIAMS: I'd like to call
 11 Ms. Williams.
 12 MR. WIGGINS: Go up to the stand.
 13 DIANA WILLIAMS,
 14 being first duly sworn to tell the truth, the
 15 whole truth, and nothing but the truth, testified
 16 as follows:
 17 MR. WIGGINS: Okay. You may start,
 18 Ms. Williams. Now, you don't have to speak in
 19 third person. Just tell me what happened.
 20 MS. WILLIAMS: Okay. Thank you, sir. As
 21 school started for the 1996-97 school year, there

1 was -- at the first faculty meeting, which
 2 occurred late August or early September of that
 3 same year, the staff was called and informed by
 4 Ms. White, the principal, as well as the
 5 contractor, about major renovations that would be
 6 taking place, and it was projected for about 18
 7 months that that project would be undertaken.
 8 At that time I asked the contractor was
 9 it, in fact -- because, again, you mentioned some
 10 of the major renovations, like plumbing,
 11 electrical systems, that were being installed,
 12 and I asked him was it, in fact, safe for the
 13 staff and students to remain in the building
 14 while such a major renovation was being
 15 undertaken, and, in fact, I asked him could a
 16 third party come in to check whether or not the
 17 situation was safe.
 18 He assured me that the renovation
 19 process wouldn't disturb or cause any problems
 20 for the staff and students. However, I wasn't
 21 convinced, but I let the situation remain.

1 However, a couple of days, I'll say
 2 maybe at most a week, later, I saw on the front
 3 door of the building that an asbestos project was
 4 being undertaken at Fairmount-Hartford High
 5 School. Again, just with the renovation going on
 6 and me seeing asbestos signs, I was very
 7 concerned about the well-being of everyone in the
 8 facility.
 9 Subsequently, I contacted OSHA,
 10 because, again, at that time I had limited
 11 knowledge to know that MOSH was the Maryland
 12 Occupational Safety and Health.
 13 So eventually they gave me the number
 14 to MOSH, and I contacted them by phone to let
 15 them know that I was concerned about the major
 16 project being undertaken at Fairmount-Hartford
 17 High School and, therefore, they asked me to put
 18 it in writing, my complaint, and here's Exhibit
 19 12. Excuse the order, but the exhibits were used
 20 for a number of other issues. I have it as
 21 Exhibit 12.

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However, again the fumes were so

2 overwhelming that one gentleman that was -- one

3 of the staff persons, a gentleman, saw me in the

4 halls crying and upset and asked me what was

5 wrong. I told him that I felt like I was going

6 to pass out because the fumes, et cetera, were

7 very overwhelming.

8 Subsequently, he helped me to -- he had

9 helped to escort me to the principal's office,

10 and I was very upset --

11 MR. WIGGINS: Ms. Williams, I understand

12 the fumes were strong. Tell me how or why you

13 believe that it was being caused by some lead in

14 the air.

15 MS. WILLIAMS: Okay. I believe that it

16 was being caused by the lead because, again, the

17 halls were very cloudy, like dust clouds, and

18 they were still working.

19 MR. WIGGINS: But you had no idea of

20 what was the content in the dust clouds?

21 MS. WILLIAMS: No, not at that time, no,

1 Ms. Haskins?

2 MS. HASKINS: No.

3 MR. WIGGINS: Okay.

4 MS. WILLIAMS: In fact, again, I

5 remained concerned. However, on September 19th,

6 1996 I reported to work a bit late, but as --

7 during the time classes had started, and I

8 noticed that the custodial person was buffeting

9 the halls, again, during the time that school was

10 in session, and I inquired because the fumes were

11 very potent and I was fearful that something

12 other than -- I didn't know what I was smelling,

13 but I knew they were very potent and I didn't

14 know whether or not they were hazardous.

15 So I inquired with the assistant

16 principal, Mrs. Carr, about the buffeting of the

17 halls during class time. I was very upset that

18 such was going on during school time.

19 MR. WIGGINS: I'm sorry. What does

20 buffeting the halls during school time have to do

21 with a lead abatement issue?

1 MS. WILLIAMS: My point is that I

2 thought he was buffeting up lead because the

3 halls were very dusty, and I'm thinking he's

4 cleaning the lead up from the floor.

5 So I, in fact, inquired, even went to

6 the principal, Ms. White, to inquire about the

7 same issue. In fact, it was early in the

8 morning, and, again, the fumes were very potent

9 it was very cloudy in the building that

10 particular day, clouds of dust, because, again,

11 the renovation was certainly in progress.

12 In fact, the fumes were so overwhelming

13 by the -- I guess about 10:30 or 11 that I even

14 put my head out of the window to try to get some

15 fresh air because it felt like the fumes were in

16 my nose.

17 Subsequently, I was starting to feel

18 nauseated, dizzy, and eventually -- I was trying

19 to hold out until my prep period so I could go

20 and tell Ms. White that I couldn't take it any

21 longer.

1 MS. HASKINS: I'm not sure about the date the test was done. I just see when it was signed.

2 MR. WIGGINS: We are talking about -- well, as it's a report from a Federal agency that did an inspection.

3 MS. HASKINS: I understand that.

4 MR. WIGGINS: Do you have any challenge to the fact that the inspection was done?

5 MS. HASKINS: Well, I object because it has more than one date on it where the people have signed it, and I object based on who can verify that this is accurate.

6 MR. WIGGINS: Well, I'm going to accept it as being reliable as a report from a Federal agency that was, in fact, submitted, and we will take into evidence as Respondent's Exhibit Number 6 the inspection report from the U.S. Department of Labor, Occupational Safety and Health Administration.

7 You may continue, ma'am.

1 MS. WILLIAMS: Yes, sir. On November 2 the 7th, 1996, there was a teachers' faculty meeting. Again, I was absent during that time.

2 However, one of my colleagues -- former colleagues sent me a copy of the report in regard to the lead and renovation problems at Fairmount-Hartford High School.

3 MR. WIGGINS: Now, is it your intent to present that?

4 MS. WILLIAMS: Yes, sir.

5 MR. WIGGINS: Then I need for you to present it, ma'am.

6 MS. WILLIAMS: The overall statement is on page one there.

7 MR. WIGGINS: We'll mark as Respondent's Exhibit 7 a -- it appears to be, I guess, an agenda for a teachers' meeting dated the 7th day of November 1996 for the Fairmount-Hartford Institute, school 456.

8 (Whereupon, Respondent's Exhibit No. 7 marked.)

1 MR. WIGGINS: What is the relevancy of that document, ma'am?

2 MS. WILLIAMS: The relevancy is to prove that, in fact, there was a lead-based hazard -- lead paint hazard problem at the school, and the staff was being informed of some of the issues concerning the lead-based paint hazards.

3 MR. WIGGINS: Okay. Is it your intent to have it admitted into evidence?

4 MS. WILLIAMS: Yes, sir.

5 MR. WIGGINS: Any objections, Ms. Haskins?

6 MS. HASKINS: No.

7 MR. WIGGINS: We will allow it into evidence as Respondent's Exhibit Number 7.

8 MS. WILLIAMS: Prior to my going into some other matters, I'd like to present here certifications as a lead abatement expert so that when I speak on issues you can see that I know what I'm talking about.

9 MR. WIGGINS: Okay. Present it. Do you

1 have a copy for Ms. Haskins? Do you have one 2 copy?

3 THE WITNESS: I have two copies.

4 MR. WIGGINS: Okay. You hold your copy. I will mark as Respondent's Exhibit 8 a series of certificates documenting Ms. Diana Williams' educational and training background in the area of lead paint abatement and lead paint services to establish herself as a lead paint abatement expert.

5 (Whereupon, Respondent's Exhibit No. 8 marked.)

6 MR. WIGGINS: Is it your intent to enter that into evidence, Ms. Williams?

7 MS. WILLIAMS: Yes, sir.

8 MR. WIGGINS: Any objection, Ms. Haskins?

9 MS. HASKINS: I object on the grounds that Ms. Williams was employed by the school system as a teacher, and I don't see the relevancy of this.