



Board of Mahoning County Commissioners

Office of Lead-Based Paint Hazard Control

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County Commissioners

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WORK PLAN

NARRATIVES:

1) Program Management and Capacity Building including data collection and program evaluation;

The administrative organization of the Mahoning County Lead-Based Paint Hazard Control Program will be under the office of the Board of Mahoning County Commissioners. The office will be dedicated to all lead hazard control activities in Mahoning County. The office of Mahoning County Lead-Based Paint Hazard Control will include the following staff: Program Director (24 months), Program Processor/Assistant Director (24 months), Office Manager/Interviewer (21 months), three (3) Housing Specialist, (two of whom are for 21 months and one for 12 months), and an Interviewer/Clerical Support person (15 months).

The Program Director is a full-time position to administer, implement and process lead-based paint hazard control strategies. The program director will spend 35% of the time in program administration and 65% in program implementation. The program processor/assistant director will be responsible for bidding contracts, issuing Notice to Proceeds, and will also assist in relocation for clients. The office manager/interviewer will work closely with the Program Director to facilitate and assist the day-to-day operations of the Lead-Based Paint Hazard Control Program. These positions are 35% and 15% administrative and 65% and 85% program implementation respectively. The interviewer/clerical support person is a full-time position and will spend 100% of the time on implementation of grant resources. The three (3) program housing specialists will work full-time to write lead hazard control work specifications and inspect the completed work for payment.

The project director will devote his time to the Mahoning County Lead-Based Paint Hazard Control Program for the life of the program. The Program Director will be responsible for planning, directing and coordinating the Mahoning County Lead-Based Paint Hazard Control Program through integration with all existing housing and housing related programs operating in the City of Youngstown and Mahoning County. The Director will serve as an advisor to the community and business interests, healthcare providers, public health officials, housing rehabilitation agencies, real estate firms, banks and lending institutions, and private contractors regarding lead-safe housing in Mahoning County, and, act as the Lead Program's liaison to Mahoning County's Task Force to End Lead Poisoning. The Director will be responsible for:

supervision of project staff; preparing contracts between subcontractors and Mahoning county; monitoring contracts for compliance; responsible for all activities to be implemented/developed in the work plan; and, preparation of reports to HUD.

The participating organizations include the Mahoning County Childhood Lead Poisoning Prevention Program. This organization has been committed to identifying and offering the most comprehensive and cost effective services to at-risk children, their parents, and their health care providers. **The Mahoning County Childhood Lead Poisoning Prevention Program is only one of more than fifty (50) Working Partners** who represent a broad spectrum of the local community. Each partner and their role on implementing the work plan are identified in Appendix 2. All the major non-profit and public agencies that do rehabilitation work in Mahoning County are working partners and have provided matching funds. The whole community has come together as evidenced by the participation of more than fifty (50) Working Partners and by the commitment of over \$2,000,000.00 in matching funds. These existing resources will be used in conjunction with HUD Lead Hazard Control Grant Funds. The working partners will be involved in the following elements of Mahoning County Lead Hazard Control Program: lead hazard testing; lead hazard control work, including interim controls and abatement techniques; community awareness education; outreach; training and licensing of lead workers and lead contractors; lead screenings of children; clearance examinations; and program evaluation. Each Working Partner has provided a letter of commitment for the Renewal Grant application; and will enter into a formal contractual agreement for work outlined in Appendix 2. Mahoning County Lead-Based Paint Hazard Control Program's Director will be responsible to coordinate with the Working Partners and for the successful implementation of the program elements. Functions of the program office will include: overall program management; coordination of partners' proposed activities; the implementation of the loan, grant and matching funds program; management of the contractor selection process; the conduction and completion of the lead hazard control work, including the relocation process. The following narrative describes in detail the loan, grant and matching funds program:

Selection of Properties: (1). Households referred to the Mahoning County Lead-Based Paint Hazard Control Program by the Mahoning County Childhood Lead Poisoning Prevention Program must contain a child under six (6) years of age, who has an elevated blood level (EBL) of 10 mcg/dL of blood or greater. (2) Qualifying units earmarked for existing rehabilitation programs such as Youngstown Community Development, Mahoning County CHIP and CHOICE must contain a child under six (6) years of age or, if vacant, must rent to families with children under six (6) years of age. (3) Households that contain a child under six (6) years of age, qualify as low-income families, and are located in the targeted census tracts will qualify for lead hazard control funds as part of the lead program's Primary Prevention Program. (4) Rental housing that is vacant may be eligible for lead hazard control funds if the landlord agrees to rent to a family with children under six years of age who qualify as low-income and live within the targeted census tracts. In addition, the landlord must also agree to sign a one-year lease with the family with an option for a second year.

Available Financial Assistance: (1) Grants with a ceiling of \$15,000.00 of lead hazard control funds will be available to owner-occupants for lead-based paint hazard control work. The eligible income level for these grants is at or below the 80% level of the median income, with adjustments for household size (Section 8 Income Limits, Youngstown-Warren, Ohio). If the total family income falls at or below the 80% level, the

applicant will be eligible for a grant up to \$15,000.00 for the actual cost of the lead hazard control work. (2) All owner-occupants would have to meet/agree to the following stipulations: 1) the assisted unit must be the principal resident of the family; 2) the property taxes on the unit assisted must be either paid up-to-date or if in arrears no more than three years. If in arrears, arrangements must be made with the County Treasurer's Office for a tax payment schedule; 3) the owner-occupant will have to comply with the lead hazard control strategy. (3) If a landlord owns and/or controls four or less rental units, the following will apply: A match of 80/20 will be utilized for landlords whose units are occupied by tenants with income levels at or below 80% of the area median income level. The maximum amount of the match provided by the Lead Hazard Control Funds is \$12,000 per unit on an 80/20 match basis. The match is based on a ceiling of \$15,000 per unit. The Lead Hazard Control Program may on a case-by-case basis, provide 0% loans to landlords, whose personal income is at or below 80% of the median income level, for their 20% matching share. This loan would be payable in full, when the property is sold or transferred. (4) If a landlord owns more than four units (this would include being involved in a corporation, which owns property), the following will apply: 1) the first four units would come under the guidelines for four or less units. A corporation will be treated as a landlord with an income level above the 80% level of the median income; 2) if a fifth or more unit is assisted, a 3% loan will be utilized for landlords whose units are occupied by tenants whose income levels are at or below the 80% level of the median income. The maximum amount of the loan is \$15,000 per unit. This loan would be payable by monthly payments for a period of ten years. (5) All landlords must meet the following stipulations: 1) the landlord must not raise the rent by more than 3% per year for a period of three years. This three-year period will not begin until the hazard control process has been completed and accepted; 2) the landlord must give priority in renting units that are assisted, to families at or below the 80% level of the median income, and have a child under the age of six years living in the household. This priority would be for a period of not less than three years following completion of lead hazard control activities; 3) the landlord must offer a one-year lease to the tenant(s) of any assisted unit. However, the tenant may choose not to accept this offer; 4) a landlord must not terminate the tenancy of a tenant of rental housing assisted with Lead-Based Paint Hazard Control Funds except for serious or repeated violation of the term and conditions of the lease; for violation of applicable Federal, State, or local law; or for other good cause; 5) the property taxes on the unit(s) assisted must be paid up-to-date; 6) the landlord's match money will be used first (before any Lead-Based Paint Hazard Control Funds) to pay for the hazard control work; 7) the landlord will have to comply with the lead hazard control strategy.

The Program will be administered and monitored by the Program Director and his staff. The operational procedures will include the following components: (1) Application for grant, loan or matching funds - the applicant will first complete a questionnaire form. The program guidelines and financial assistance will be reviewed with the interviewer and explained to the applicant. The applicant will then be given a packet of information containing guidelines, grievance procedures, and information on the dangers of lead-based paint. The applicant will sign a form acknowledging receipt of packet and will complete and sign all necessary verification forms. (2) Verification and work preparation - the staff will send out verification forms, verify ownership of property, inspect houses and write specifications. The owner must then approve the specifications. A written estimate of the lead hazard control costs will be made and the bid package will be prepared. (3) Continuing administrative functions- staff will record applicant and contractor EEO information, maintain case records for all loans and

grants, complete periodic status reports on all active cases, and keep a log on each contractor as to number of current jobs, satisfactorily completed jobs, complaints, resolution of complaints, and performance within allowed time period. Also, separate relocation files will be maintained for each applicant documenting his/her relocation. (4) Contractor Registration- Each contractor must have on file a completed contractor's questionnaire and, submitted proof of liability insurance, vehicle insurance and workers' compensation. In addition, proof of licensure by the State of Ohio for lead hazard control work must be on file. The Lead Program will establish a lead-based paint contractors pool utilizing referrals from the Youngstown Area Urban League, the training of rehab contractors who do rehabilitation for other agencies in Mahoning County and by offering specific lead courses for licensure. Allegheny County Community College and Youngstown State University will offer training courses for lead contractors, supervisors, workers, lead inspectors and risk assessors. This program is credited by the State of Ohio. (5) Bidding - an invitation to bid will be advertised in the local newspaper and the names of each contractor who received a bid packet will be recorded. Written estimates for each lead hazard control work job will be maintained in the case file. Bid documents must be sealed in an envelope, which is clearly labeled with the words "bid documents" and show the project name and address, name of bidder, date and time of opening. At the time and place fixed for opening of bids, every bid received within the time fixed for receiving bids will be opened and publicly read aloud.

Please note that a contractor awarded a bid for a lead hazard control job must be licensed by the State of Ohio and must follow all HUD, OSHA and EPA Guidelines. The Mahoning County Lead Program will provide assistance to prepare contractors for the bidding process by counseling them for training, licensure and bonding issues. (6) Bid acceptance- the staff will notify contractors and owners of successful bids. The owner will then sign acceptance of successful bidder's form. (7) Processing of funds- A purchase order will be completed and approved for the lead hazard control work for each housing unit. (8) Grant or loan settlement- Truth-In-Lending disclosure statement will be given to applicants along with Notice of Opportunity to Rescind Transaction. Mortgage papers, promissory note, certificate of assistance will be signed by the applicant. Both the contractor and the owner must sign the lead hazard control agreement. A proceed-to-work order will then be issued. (9) Construction work- no change orders will be valid unless approved by the inspector, administrator of the grant program, and other contracting officials. Estimate for additional work must be done independently of the contractor and prior to any approved change order. The monitor along with the Housing Specialists will conduct periodic inspections of contractor's lead hazard control work, including the setting up of containment, certifying that at final cleaning the affected areas are free of dust and debris and ready for clearance testing. The Housing Specialists will approve for payment all work that is completed in a professional and timely manner, and according to the standards set out in the specifications. If a dispute should arise between parties involved (owner, contractor or staff), resolution will be attempted at the following levels: a) meeting of owner, contractor, and appropriate staff members, and, b) filing of grievance with grievance committee. All necessary zoning and building permits must be submitted before a proceed-to-work order will be issued. (10) Close out of contract- the staff will conduct final inspections of all completed work and obtain owner's signature on final inspection form. Also, obtained will be a letter of guarantee from contractor. Before payment is made to contractor, the owner must sign a certification of satisfaction. The staff will then send the owner a closing packet. (11) Closing case file - A Closing Packet will be

given to each applicant when the lead hazard control work is completed on his or her unit. The Closing Packet includes the following items: a copy of the lead inspection/risk assessment; a copy of the Certificate of Post-Abatement Clearance; a copy of the specifications; a copy of the Certificate of Lead Pollution Insurance; a copy of the Contractors Report; and a copy of the On-Going Monitoring and Maintenance Acknowledgement Form. The above operational procedures make it possible to administer and monitor a loan, grant and matching funds program. Without this step-by-step process clearly defined, control would be very difficult.

How funds will be dispersed: As previously mentioned, Mahoning County will enter into an Agreement with its working partners. The County will reimburse each Provider on a cost reimbursable basis. The Providers will submit billing statements on a monthly basis. Only those costs, which are determined to be allowable, allocable, and reasonable in accordance with the cost principles of OMB Circular A-87, and OMB Circular A-122 will be reimbursed to the Provider. Licensed lead-based paint hazard control work contractors will enter into contracts with the owners of the units scheduled for lead hazard control work. The contractor will be allowed periodic payments utilizing request for payment forms. These forms will be submitted to the Program Processor/Assistant Director of the Lead-Based Paint Hazard Control Program. All work must be approved by the housing specialists before any payment is made. Absolutely no funding will be advanced to contractor for labor or materials.

Selection process for sub-grantees and subcontractors: Depending upon the estimated value of the lead hazard control work, the lead-based paint contractor selection process for the lead hazard control work will be done either by Invitation-to-Bid which will be advertised in the local newspaper or by Request for Quotation. The names of each contractor who receives a bid packet will be recorded. Written estimates for each lead hazard control job will be maintained in the case file. Bid documents must be sealed in an envelope, which is clearly labeled with the words "Bid Documents" and show the project name and address, name of bidder, date and time of opening. At the time and place fixed for the opening of bids, every bid received within the time fixed for receiving bids will be opened and publicly read aloud. Any contract awarding a bid for lead hazard control work must have a contractor and workers licensed by the State of Ohio, and must follow all applicable HUD, OSHA, and EPA guidelines.

The selection process for testing to be conducted by an agency other than the Mahoning County Childhood Lead Poisoning Prevention Program or any other service needed by the Lead Hazard Control Program will be accomplished by Request for Proposal (RFP). Each proposal will be evaluated on the following criteria: 1) evidence of firm's ability to perform the work, as indicated by the profiles of the principals and staffs' professional and technical competence and experience and their facilities; 2) capabilities to provide all required services in a timely manner; 3) past performance in terms of cost control, quality of work, and compliance with performance schedules; and 4) demonstration of firm's understanding of the required work.

PROGRAM EVALUATION, DATA COLLECTION, AND RESEARCH: John Zilka will independently evaluate The Mahoning County Lead-Based Paint Hazard Control Program. The evaluator is a Senior Scientist with QuanTech, and has extensive experience regarding lead issues. The personnel and methodology responsible for lead-based paint hazard control will be done consistent with HUD Guidelines.

Specific methods will be used to measure progress and evaluate the program's overall effectiveness. Data will be collected by a registered sanitarian and other program personnel and documented on appropriate forms, and other supplemental forms as needed. Appropriate lead testing will be done baseline (before the intervention), for clearance (after the intervention), and 12 months after the intervention.

Information on appropriate forms will be reported to the evaluator. Data will be collected on the dwelling units, buildings and occupants affected by the program; on the results and costs of the hazard evaluation and control; and on any re-evaluation and subsequent control actions.

The evaluator will meet with program staff to explain the design of the program evaluation. Program staff will be responsible for implementing data collection. In addition, the evaluator will: ensure the accuracy and completeness of the data. Additional data may be collected by the evaluator and staff to ensure the reliability and validity of program-reported data. Appropriate statistical analysis will be conducted, and a report will be authorized.

Outcome measures which will be assessed as part of this evaluation are lead dust levels, lead paint samples, lead soil tests, and blood levels of children under 6 years of age, screened in accordance with Centers for Disease Control criteria. Decrements in the quantity of lead for these measures will be calculated for homes where a combination of interim controls and abatement techniques were completed. Costs associated with each mcg/dL decrement in blood lead will also be calculated. By comparing the lead levels of the home's baseline, at clearance, and twelve months after intervention, the most effective and efficient methods of decreasing lead levels will be established. The analysis will include historical controls from STELLAR. These historical control children resided in dwelling units without HUD sponsored control/reduction to document changes in blood lead. Information collected from the evaluation will be shared among program participants by distribution of a report and formal presentation of results. In addition, there will be a scientific presentation and publication with HUD's consent and approval.

The sequence of tasks for the life of the project period of performance is as follows: 1) Begin project management (01/01/03 to 12/31/04). The key personnel for this task are the Project Manager and the Program Processor/Assistant Manager. **The Lead Program will seek to obtain HUD's approval for the Release of Funds Request (HUD Form 7015.15) in a timely manner.** 2) Start data management (01/15/03 to 12/31/04). The key personnel and/or organizations for this task are the Lead Inspectors/Risk Assessors from the Mahoning County Childhood Lead Poisoning Prevention Program, the Program Manager, the Program Processor/Assistant Manager, the Office Manager, and John Zilka of QuanTech. 3) Conduct community education/outreach (02/15/03 to 12/31/04). The key personnel and/or organizations for this task are the Mahoning County Childhood Lead Poisoning Prevention Program, the Youngstown Area Urban League, YACAC WIC Program, St. Elizabeth Health Center, Organizacion Civica y Cultural Hispana Americana, Program Manager and Program Processor/Assistant Manager. 4) Identify/inspect units (02/15/03 to 12/31/04). The key personnel for this task are the licensed Lead Inspectors/Risk Assessors from the Mahoning County Lead Poisoning Prevention Program and the Program Manager. 5) Implement screening/treatment (02/15/03 to 12/31/04). The key personnel and/or organizations for this task are employees of the Mahoning County Childhood Lead Poisoning Prevention Program, and St. Elizabeth Health Center. 6) Prepare

specifications/bid proposals (03/01/03 to 08/31/04). The key personnel for this task are the Housing Specialists and the Program Processor/Assistant Manager. 7) Initiate relocation process (04/01/03 to 9/30/04). The key personnel for this task are the Program Manager and Program Process/Assistant Manager. 8) Complete interim controls and abatement techniques (04/15/03 to 11/30/04). The key personnel for this task are the licensed contractors and licensed workers. 9) Conduct pre and post testing/follow-up (02/15/03 to 12/31/04). The key personnel and/or organizations for this task are the licensed Lead Inspector/Risk Assessors, and other staff members of the Mahoning County Childhood Lead Poisoning Prevention Program, St. Elizabeth Health Center, and Mr. John Zilka of QuanTech.

2) Community Education, Outreach and Training:

Lead Hazard Control Outreach and Community Involvement: The Task Force to End Lead Poisoning was formed to assess the Community needs to prevent lead poisoning by identifying problems and developing prevention and intervention strategies to decrease the incidence of lead poisoning in Mahoning County. The members of the Task Force provide technical assistance in the areas of healthcare, housing, lead hazard control, legal issues, education, construction, rehabilitation, weatherization, social skills, parents' issues, political issues, financial issues, liability, insurance, research and development, and outreach efforts including public awareness campaigns.

The proposed outreach activities will enhance the current outreach program in Mahoning County. The Mahoning County Childhood Lead Poisoning has provided numerous programs each year to increase public awareness. These programs include presentations for the public and professional groups. The programs presented in the past include: Hospital Grand Rounds for physicians, seminar for nurses, social workers, teachers, health care providers, realtors, landlords, parents, neighborhood watch groups, health departments and many other groups. The proposed outreach activities will include not only the current level of outreach, but also will include outreach in the high-risk targeted census tracts.

The Mahoning County Lead-Based Paint Hazard Control Program will be responsible for ensuring that education; outreach and Community awareness efforts are implemented. One effort involves St. Elizabeth Health Center and the Youngstown Area Community Action Council's WIC Program in delivering primary prevention services to families with children under four (4) years of age who are in danger of being lead-poisoned. Other efforts involve: implementing programs which will effectively increase the number of children screened for lead poisoning such as sending Phlebotomists door-to-door in the targeted census tracts; making available Section 8 Housing Choice Vouchers to families who have either lead-poisoned children or children with elevated blood lead levels; creating a public relations campaign to promote lead poisoning prevention; and providing Section 1012/1013 training not only in Mahoning County, but on a regional basis, involving twelve (12) other Housing Authorities located in surrounding Counties in Ohio.

The nature of our involvement with faith-based organizations is as follows: (1) Six (6) targeted census tract area churches involving the Afro-American community and the Hispanic community have become Working Partners with the Mahoning County Lead-Based Paint Hazard Control Program for the purpose of outreach and education; (2) Catholic Charities Housing Opportunities has entered into a Working Partnership with

the Lead Program involving the renovation of housing units. In addition, this partnership will involve outreach and educational activities throughout the Diocese six (6) county service area (Ashtabula, Columbiana, Mahoning, Portage, Stark, Trumbull) using existing networks and publications of the Diocese, including links to parishes, newsletters, and their housing counseling network; (3) Furthermore, Beatitude House, a Catholic non-profit organization which is committed to disadvantaged women and children, has also entered into a partnership with the Lead Program. This partnership involves making housing units lead-safe for young children.

Outreach efforts to involve participants will utilize a variety of approaches in order to reach the largest audience possible. The outreach effort will identify and utilize local resources such as the lead program staff, community groups and agencies, elements of city and county government, and colleges and universities for performing outreach functions. Notices will be placed in places of employment, unemployment offices, welfare offices, post offices, grocery stores, churches, community halls, city and county offices and utility companies. News stories informing the public about the lead program will be published in daily and weekly newspapers and other local publications. Public service announcements regarding the Lead Program will be made by local radio and television stations, both in English and Spanish. Applicants will be encouraged to inform their friends and relatives about the Mahoning County Lead-Based Paint Hazard Control Program. Organizations like the Organizacion Civica y Cultural Hispana Americana (OCCHA) will be utilized to reach the Spanish speaking community. Both Mahoning County's and the City of Youngstown's Health Departments will inform the public about the Lead Program. Organizations, like the Youngstown Area Urban League, will assist the program's outreach efforts.

The local Community has come together as evidenced by the participation of more than fifty (50) Working Partners. Outreach efforts will target residents in the selected census tracts, parents, real estate brokers/agents, insurance companies, banking institutions, landlords, educational centers, etc. All the non-profit housing corporations and major health care providers are partners with the Mahoning County Lead-Based Paint Hazard Control Program. Mr. John Zilka of Applied Systems Inc. will commit corporate resources (in-kind) for general lead-based paint awareness training sessions to the area real estate, banking and insurance companies.

Lead-based paint standard maintenance practice workshops will be held. A sample of topics are: developing a custom fit checklist to conduct lead-based paint maintenance activities in a safe manner; basic information on proper and improper lead hazard control work practices; "work smart" "work clean" "work wet" and "work safe"; and the new EPA Pre-Renovation Information Rule. With these and other workshops scheduled for renovators and remodelers, Landlord Associations, Section 8 Landlords and others; lead-safe work practices can be integrated into their ongoing maintenance of housing units.

The Youngstown Area Urban League in partnership with the Mahoning County Lead-Based Paint Hazard Control Program will assist in the recruitment and training of minority and low income contractors and workers for lead hazard control activities. This task will include assisting contractors and workers in obtaining state certification. Classes for lead licensed workers, lead licensed contractor/supervisor classes, and classes for Lead Inspector/Risk Assessor are planned over the two-year period of the Renewal Grant. In addition, the Youngstown Area Urban League will

conduct Fair Housing and Outreach involving educational forums for participants in the Lead Hazard Control Program and for residents in the targeted census tracts, duplication of Fair Housing materials for distribution, and conducting outreach and providing information on Fair Housing through printed and electronic media.

The Youngstown Metropolitan Housing Authority will also partner with the Mahoning County Lead-Based Paint Hazard Control Program in a **Youthbuild Program**. Up to thirty-six (36) low-income youths between the ages of 18 and 24 years old will be trained to become lead-licensed workers. The Authority will insure that these low-income trainees have sufficient carpentry skills to take advantage of the lead training.

The Mahoning County Lead-Based Paint Hazard Control Program will be able to evaluate its' outreach efforts by the following measurable goals: a) increased awareness on the part of the community about lead-based paint poisoning, specifically childhood lead poisoning as measured by pre and post workshop questionnaires; b) number of lead screenings conducted for children under six years of age; c) number of workers, contractors and risk assessors licensed by the state of Ohio; and d) other factors relevant to the outreach effort.

3)Lead Hazard Control activities including testing, interventions conducted and relocation:

1. Implementing a Lead Hazard Control Program: There are twenty-four (24) targeted census tracts in the City of Youngstown and seven (7) targeted census tracts in Mahoning County, Ohio. The targeted census tracts have very high socio-economic and environmental risk factors that demonstrate the prevalence of lead exposure. These factors include age of housing, high poverty, crime, low proficiency scores, and concentrated ethnicity. In addition, current STELLAR data identified a high concentration of children found to have lead poisoning in the targeted areas. The targeted census tracts have documented evidence that lead poisoning is epidemic in Mahoning County.

The Lead Hazards will be eliminated in one hundred and six (106) housing units. Each housing unit will receive a combination of interim controls and abatement techniques, forty-six (46) of which are projected to be owner-occupied units; twelve (12) of which are projected to be rental-occupied units; and forty-eight (48) of which are projected to be vacant units. \$9,820.75 of lead hazard control funds is projected to be expended for the housing units receiving a combination of interim controls and abatement techniques. The substantial matching funds committed for this grant has greatly reduced the amount of lead hazard control funds needed to make housing units lead-safe.

The Mahoning County Lead Hazard Control Program will utilize a site-specific lead inspection/risk assessment conducted by the Mahoning County Childhood Lead Poisoning Prevention Program to determine the nature and scope of the lead hazards and the types of lead hazard controls needed (lead cleanings, interim controls and/or abatement techniques). The overall goals of the strategy are to reduce immediate lead hazards such as lead contaminated dust, lead contaminated bare soil and loose, peeling, or flaking lead-based paint to clearance levels; to slow recontamination by treating bare soil and high risk lead-paint surfaces; to make repairs to prevent paint

failure; to facilitate clean-up of recontamination by creating cleanable floors and window troughs; and to educate owners and occupants on lead safety and in-place management of lead hazards, particularly regarding the slowing and cleaning of recontamination.

The Mahoning County Lead-Based Paint Hazard Control Program will insure that lead-safe units remain affordable by requiring landlords to agree to a set of stipulations that include the requirement that the landlord must not raise the rent by more than 3% per year for a period of three years and to give priority to renting to low to very-low income families who have children under six years of age living in the household. This three-year period will not begin until the hazard control process has been completed and accepted.

Resources: There are more than fifty (50) Working Partners that represent a broad spectrum of the Community. Each partner and its role are identified in Appendix 2. All the major non-profit and public agencies that do rehabilitation work in Mahoning County are Working Partners and have provided matching funds. Also, the Blockwatch Organization that represents sixty (60) Blockwatch groups has indicated a willingness to participate in the outreach process and in lead awareness seminars. In addition, the Section 8 housing department is a Working Partner who will provide outreach services to Section 8 landlords. The number of educational programs projected to be presented is at least thirty-five (35) over the two-year Grant Renewal period. The basis for this estimate is the number and diversity of the Working Partners, the willingness of the Partners to participate, and the coming together of the Community to make lead awareness a major issue. The first step in making a difference is to increase the knowledge and importance of lead issues not only in the community-at-large, but also in the targeted census tracts.

Technical Approach for Conducting Lead Hazard Control Activities: Mahoning County's Lead-Based Paint Hazard Control Strategy will focus on the control of lead dust by limiting the generation of lead dust, containing lead dust within work areas, ensuring daily and final cleanings, and by clearance testing. Also, the strategy prohibits abrasive blasting, power sanding, open flame burning, and ethylene chloride strippers. The exterior treatments will consist of the following: 1) Siding and carpentry repairs - any damage contributing to lead-based paint failure such as nonfunctional gutters will be repaired. All gutters and downspouts will be made functional. Staff will ensure that flow is away from foundation. Siding will be wet scraped and painted. However, if the siding is highly deteriorated and the cost for enclosure is within budget, it will be enclosed with vinyl siding. 2) Porch repairs - components that are damaged and contribute to exterior lead-based paint failure will be repaired. If the substrate and paint of the deck is sound, then it will be repainted. If the substrate is sound and the paint deteriorated, it will be necessary to stabilize and then repaint. If the substrate is deteriorated, then repair or replacement will be necessary. Ceilings should be stabilized or enclosed. Also, other components should be stabilized, enclosed, or replaced as needed. 3) Garage repairs - if the substrate is good, stabilize and repaint. Repair, replace, or remove components that are deteriorate. If the garage is too deteriorate to paint or repair, then it should be demolished.

The treatment of soil will be limited to areas with bare soil in the immediate vicinity of the structure, ie. dripline or foundation of the unit being treated, and children's play areas. The two hazard standards for bare residential soil are 400 PPM for play areas

and an average of 1,200 PPM for the rest of the yard. Each site may involve a mix of different treatment areas. If required by terrain, perimeters will be boxed-in to prevent erosion of covering material.

The interior treatment will consist of the following: 1) Initial and daily cleaning- prior to set-up of containment, debris will be removed and a HEPA vacuum will be used on the floor and furniture. On a daily basis, large debris will be removed and a HEPA vac used on the floors. 2) Repairs and component replacement- damaged substrate that is causing paint failure will be replaced. All roof leaks, plumbing leaks, and other moisture problems causing paint failure will also be repaired. The extent of the repairs or replacements will be based on site-specific risk assessments, taking into account budget constraints. 3) Paint stabilization - all loose, flaking, and peeling interior painted surfaces not otherwise treated will be stabilized (wet scraped/wet scoured and primed). 4) Windows- if the substrate of the window trough is deteriorated, the trough will be enclosed with coil stock or replaced. The interior windowsill, if chewed, should be covered with vinyl or encapsulated. Other surfaces such as the sash, stop, un-chewed sill, glazing should be stabilized or replaced. 5) Doors/jambs - if the door and its components are ill fitting, they should be adjusted, cut re-hung, or replaced as needed. If the substrate of the thresholds is sound, then enclose with vinyl. If the thresholds are deteriorated, replace them with metal or wood. 6) Stairs- stabilize and prime the stringers and other components. Repair or replace as needed. Cover the treads with rubber treads and bull nose. 7) Walls and ceilings- stabilize where substrate is sound and paint is loose, flaking, or peeling. Patch and prime small sections that are damaged. Enclose or replace areas where damage is too much to patch. Where there is a drop ceiling with lead-based paint above, the tiles should be replaced and the ceiling above should be treated the same as a wall. 8) Hard surface floor- if the floor is not painted with lead-based paint and the substrate and finish is in good condition, then the floor should be washed. However, if the finish is not good, the floor should be sealed. Repair or enclosure is recommended if the substrate is bad. If a kitchen or bathroom floor is involved, then cover with tile. If a floor is painted with lead-based paint, enclose. 9) Carpets - if the carpet is not too contaminated (as determined by dust test) or too deteriorated, vacuum it to clearance. If it's too contaminated, the carpet should be removed and the floor treated. 10) Basement floors- stabilize and seal if floors contain lead-based paint. Also, install vinyl runners in high traffic areas. However, if the floor is not leaded, but other basement lead work is being done, then the accessible areas should have the following treatment: HEPA vacuum/wet clean/HEPA vacuum. If the floor is not leaded and no other lead work is being done in the basement, then clean as indicated by usage. 11) Radiators- stabilize and paint the radiators with heat-rated paint or enclose with covers. 12) Final cleaning- (at the end of interior work)- HEPA vacuum/wet clean/HEPA vacuum all horizontal surfaces such as floors, sills, troughs, countertops, and trim in all rooms. Wipe or vacuum furniture. Walls and ceilings are not cleaned unless there is evidence of dust from repairs, renovation, or repainting; or unless dust tests indicate high levels. The certified risk assessors and inspectors used for unit testing will be independent of the lead hazard control work contract.

The sequence and scheduling for lead hazard control dust-wipe testing will occur during the lead inspection/risk assessment as described in Chapter 5, table 2 of the HUD guidelines. The program will combine both a risk assessment and lead inspection for the identified houses. This method will enable the program to collect data for the surface-by-surface inspection as well as the data for the analysis of dust, deteriorated

paint and soil. Analysis of these samples should be available within 4 to 6 hours of the collection. The Mahoning County Laboratory (a Working Partner of the Lead Program) has met all the criteria established in the Ohio Administrative Code 3701-82-02 ©. The laboratory approval number is 10031. The combined analysis of these activities will allow the program to address the lead-based paint hazards in a comprehensive manner in order to combine interim control and abatement strategies. Post-hazard control and clearance testing will be scheduled in a timely manner to hold relocation costs to a minimum. According to HUD guidelines clearance testing can be conducted one hour after the project is cleaned and completed. The risk assessor/lead inspector along with the project monitor will then schedule and perform a visual examination of the project to determine if the work was completed as recommended and if there is visible dust, paint chips or debris left from the construction. If the visual examination determines that these areas are clear, then the post-clearance dust sampling of floors, interior window sills, and window troughs will occur. The samples will be sent to the laboratory and the results should be returned within 4 to 6 hours. If the areas are not determined to be in compliance, the risk assessor will notify the contractor to correct the non-compliant areas and notify the program when they have been completed. Clearance will be repeated until all areas are within the HUD Interim Clearance Standards. The schedule for dust wipes for post-abatement and for clearance testing will follow the recommended minimum number and location of single surface dust samples from Table 15.1 of the 1995 HUD guidelines. Clearance testing and examination, post-hazard and follow-up testing will be conducted according to the HUD guidelines and State Statute. To ensure compliance, a Request For Proposal will be issued, soliciting a qualified independent firm to monitor the lead hazard control process and to certify that all Statutory and Regulatory Requirements, Interim Guideline recommendations, and other applicable rules and regulations are followed.

The plan for safe and effective conduct of the lead hazard control work involves the following components: (1) resident protection during the lead hazard control process: A relocation plan has been developed to ensure that the resident protection is being implemented. (2) Worker protection during the lead hazard control process: A policy has been developed that provides for worker protection when lead-based paint lead hazard control work is undertaken. The worker protection policy includes: a) Supervisor and worker training; b) Engineering and work practice controls; c) Use of respirators; d) Use of protective clothing; e) Personal hygiene facilities; f) physical examinations; g) Blood lead monitoring; h) Exposure monitoring of airborne dust; and i) Record-keeping. Written documentation will be maintained that the above components are being implemented. (3) Disposal of lead-based paint waste: A policy has been developed that provides for the proper disposal of lead-based paint waste. The Lead Program will comply with EPA's policy (guidance number 2001-01) which deals with lead-based paint wastes generated from lead hazard control activities at residential properties. Written documentation will be maintained in the file.

Once the lead hazards are identified, the Mahoning County Lead-Based Paint Hazard Control Program's Housing Specialists will write working specifications to be included in the bid proposals. The Housing Specialist are all state-licensed lead contractors and thus able to write lead hazard control specifications. These proposals will be advertised and bids will be received from state licensed lead contractors. All occupants will be relocated during the lead hazard control work process. Five (5) to fourteen (14) calendar days are needed to complete a lead hazard control job utilizing a combination of interim controls and abatement techniques.

The chosen lead-based paint threshold used will be 1.0 mg/cm². The testing methods will include: XRF testing as well as paint chip analysis when it is not possible for technical reasons to use the XRF. The Mahoning County Childhood Lead Poisoning Prevention Program regularly receives blood lead data from the Ohio Department of Health. All families of children tested receive a letter advising family of child's blood lead level and date child is due for follow up. Educational material and availability of funding for lead hazard remediation is included with the letter. The Mahoning County Childhood Lead Poisoning Prevention Program refers children identified with blood lead level ≥ 15 ug/dL to their primary care provider for medical management. The pediatric coordinator advises families without a primary care provider of the availability of primary care providers that service this area. Children are referred to Early Intervention or the appropriate board of education for developmental and cognitive evaluation according to their age. The pediatric coordinator makes referrals to community service agencies based on needs of individual families. The Mahoning County Childhood Lead Poisoning Prevention Program assures lead testing and follow up services are available to all children with elevated blood levels regardless of socioeconomic status by integrating case management efforts with primary care providers and community based programs including the Child Health Insurance Program, WIC and Mahoning County Healthcheck Coordinator. Families receive notice by mail when children are overdue for blood lead follow up. Primary care providers receive regular progress reports on their clients' case management activities and reports of clients' overdue for follow-up medical care.

To ensure the cost effectiveness of the lead hazard control methods used, meetings will be scheduled with the project director, housing specialists, representative from The District Board of Health, the project monitor and other relevant partners to review the lead hazard control process. One of the topics will be to monitor the costs of each lead hazard control method and discuss ways to increase the cost-effectiveness of the methods used. In addition, meetings will be held with the licensed lead contractors and with our Working Partners. Again, one of the topics will be to monitor the costs associated with the lead hazard control process.

The tenant relocation plan states that consistent with the Uniform Relocation Assistance and Real Property Acquisition Act of 1970, the Uniform Relocation Act Amendment of 1987 and the Department of Housing and Urban Development rules and regulations, persons involuntarily displaced as a result of federally funded projects and programs will not suffer disproportionate injuries as a result of this program. To implement this policy, the County has developed a plan to ensure that relocation payments and services are made available to persons requiring either temporary relocation or who will be permanently displaced. This procedure was established to ensure that everyone is treated fairly and equitable. The relocation plan envisions a short-term, temporary displacement of residents. The time frames to complete lead hazard control work using a combination of interim control measures and abatement techniques is projected to be 5 to 14 calendar days. Temporary housing will be secured for tenants and for owner/occupants. This method will be used for short-term relocation needs. Meals will be provided at the motel or at nearby restaurants. The Mahoning County Lead-Based Paint Hazard Control Program will be able to negotiate very favorable rates with the motel and with nearby restaurants after issuing a Request For Proposal. Transportation to and from the motel will be provided. If relocation is during the school year, special busing will be used to transport the children to and from school. If any long-term relocation is required, safe housing consisting of units that have been

made lead-safe and rehabilitated will be used. Several safe houses will be available. A voucher system will be used to track the number of meals provided. Small refrigerators and/or cribs will be provided for each motel room that has small or infant children. The length of stay will range from 4 to 13 nights. This approach was well received by persons previously relocated and has proven to be cost-effective.

The cost for the motel, meals, and transportation will be paid by the grant funding so that the relocatees will incur no out-of-pocket expenses. It is estimated that for a family of four, the relocation cost for one day is approximately \$100.00 (hotel room, meals, and transportation). No moving or storage of household furniture is necessary. During the lead hazard control process, the furniture will be moved to the center of the room and protected with 6-mil poly sheeting. The contractor will be responsible for security. Before the residents are relocated, a staff member of the Mahoning County Lead-Based Paint Hazard Control Program will videotape the interior of the house. If a claim for loss is filed against the contractor, the videotape will be reviewed for documentation. In addition, new locks including deadbolts will be installed on all primary doors of the housing units to ensure that the residents do not break containment and to enhance the security of the dwelling units. After clearance, the resident will be given the keys to the new locks.

It is important that the staff meets with the residents, well in advance of any anticipated move, so that any special needs can be documented and provided for in the relocation process. An individual relocation case file will be maintained for each family that is required to move. Also, the program will ensure that the temporary housing is decent, safe and sanitary, and lead-safe.

The procedure for post hazard control involves an On-going Monitoring and Maintenance Acknowledgement Form which informs the owner(s) of the need for on-going monitoring of the completed lead hazard control work and of the known leaded components which are presently intact. In addition, the owners are informed that it is their responsibility to monitor and maintain leaded components in order to keep the housing unit lead safe. Periodic dust wipe testing for floors, windowsills, and window troughs will be conducted to ensure that the unit continues to be lead-safe.