



U. S. Department of Housing and Urban Development
Washington, D.C. 20410

OFFICE OF LEAD HAZARD CONTROL

POLICY GUIDANCE NUMBER: 94-10	DATE: December 12, 1994
SUBJECT:	Condition of Units After Post-Hazard Control
STATUS:	Archived
APPLICABILITY:	All grant rounds.
RELATED GUIDANCES:	
COMMENTS:	Superseded by the HUD Guidelines for the Evaluation and Control of Lead-based Paint Hazards in Housing, June 1995. This guidance letter will be archived and no longer referenced.

[letter to Mr. James Jordan, Project Manager, City of Chicago, IL]

Dear Jim:

On the subject of painting abated units, or the condition in which units are left following abatement or hazard reduction, I have done a little more research since my conversation earlier this week with Nancy Crown. To summarize: while HUD would hope that the grantees will leave treated units in reasonable condition, what we actually require is considerably less.

The current Interim Guidelines are actually silent on painting. The new proposed Guidelines state that with respect to interim controls, and specifically paint stabilization, a prime coat and finish coat are necessary to help assure that the treated surface will remain intact. In the case of abatement, however, the hazard has presumably been removed, the unit is safe, and normal construction or property maintenance procedures are in order. We strongly support priming all new or stripped surfaces, and consider it prudent to prime and paint exterior wood surfaces that have been stripped. However, with the exception noted above, these are market decisions, and therefore local ones.

Your original proposal to stain or prime all wood components (new or stripped) and to prime or skim coat all new drywall, meets these guidelines. If you choose to go further, that is acceptable, however, given our careful and protracted grant agreement negotiations, I am at a loss to think from where the money for additional painting would come out of the grant. At this point in time, we are not prepared to further reduce the number- of units to be abated.

Accordingly, I strongly encourage you to look for alternative sources. For example, you may want to increase your in-kind contribution: the Department of Housing, may be able to contribute in the area of painting through its CDBG, weatherization, or rehab programs. Also, this seems like an excellent issue to bring up with your community groups like The Lead Elimination Action Drive or Parents Against Lead. They may be able to help you find additional resources. Private businesses or groups might also be willing to donate paint or other resources.

I hope this information is helpful. Please keep me informed of your deliberations.

Sincerely,

Catherine Hillard
Government Technical Representative