Questions to Ask When Reviewing Risk Assessment Reports*

***The Agency should be provided a clearly written and easily understandable risk assessment report indicating the presence of all LBP hazards, options for lead hazard control work, and results of any paint testing performed. If this is not the case, call the risk assessor and request clarification or explanation.**

Consider meeting the risk assessor on-site and reviewing the situation in the home, hazards and lead hazard control options.

1. Can you verify the risk assessor visited the site and collected all samples personally? Did the risk assessor indicate someone else (not certified as a risk assessor) collected the dust samples? Who signed the sheets delivering the samples to the laboratory for analysis ("chain of custody" forms)? What date does the chain of custody form indicate the samples were taken/delivered?

2. Some XRF instruments have the capability to measure lead just in the surface layers and all the way to the substrate. If the XRF results are listed as K-shell and L-shell readings, does the risk assessor explain what they mean? K-shell readings evaluate the lead content in all layers of paint down to the substrate. The L-shell readings evaluate the lead content in surface layers of paint.

3. Does the risk assessor point out that even if XRF results are "negative," that is, below 1.0 mg/cm2, paint containing lead can create significant dust when disturbed during rehabilitation and worker/occupant exposures can be an issue. OSHA requires employee exposure assessments/monitoring if there is any level of lead in the paint - no matter what the XRF results are (positive or negative). Also on handout #4, RA Report checklist from previous edition of CPD manual.

4. If the inspector could not reach or access all surfaces for testing, does he indicate the surfaces that were inaccessible and not tested?

5. Does the risk assessor include instructions on how the read the test data sheets?

6. Does the report or floor plan clearly indicate where the LBP and LBP hazards are? If the paint content is similar between components within a room but the condition is different, can you identify the hazard control options to use?

7. Does the risk assessment report indicate the XRF calibrations were checked before work, every 4 hours and at the end of sampling?

8. Did the risk assessor sample all deteriorated varnish, stains, and other coatings that are deteriorated or to be disturbed, in addition to the paint?

9. Does the risk assessment indicate the likely source of all dust-lead hazards? Do high lead dust levels have an obvious source? If paint in a location was tested and

is positive, did the risk assessor take dust samples to see if associated hazards are present (in living areas where the occupants spend time)?

10. Does the risk assessor clearly indicate the overall condition of all components indicated as hazardous? Remember, <u>to be a hazard, a friction or impact surface must also have dust lead above the HUD/EPA levels.</u> If lead hazard reduction is recommended for windows, for example, is it clear from the report what the condition of the windows are? The condition of components weighs heavily when deciding between performing interim controls vs. abatement. Ex: If the risk assessor indicates doors or windows are chipped, did the risk assessor take dust samples also? What is the overall condition of the windows?

11. Did the risk assessor send sample blanks to the lab with the actual samples to check the laboratory's accuracy?

12. For dust wipe samples on window sills or other curved or irregular surfaces, did the risk assessor accurately measure the sampling area and report it to the laboratory or does the risk assessor state the surface area wiped for every dust sample taken 12 X 12 inches?

13. If the risk assessor indicates window trough samples show hazards, this is incorrect. There is no hazard identification for window troughs since 3/6/01. The window trough level of 400 ug/ft2 is used only for clearance.