

FY19 NEW GRANTEE ORIENTATION



LEAD INSPECTIONS AND RISK ASSESSMENTS (LIRAS) BASICS

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GRAPEVINE, TX DECEMBER 2-5, 2019

Requirements of Policy Guidance (PG) 2013-01

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“All OLHCHH grantees that conduct lead-based paint hazard control activities are required to conduct a complete Lead Inspection (LI) AND Risk Assessment (RA)...”



U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
WASHINGTON, DC 20410-3000

OFFICE OF HEALTHY HOMES
AND LEAD HAZARD CONTROL

Policy Guidance Number: 2013-01	DATE: April 22, 2013
SUBJECT:	Conducting Lead-Based Paint Inspections and Risk Assessments for Lead-Based Paint and Lead-Based Paint Hazards
STATUS:	Current
APPLICABILITY:	All grant programs of the Office of Healthy Homes and Lead Hazard Control
RELATED GUIDANCE:	HUD <i>Guidelines for the Evaluation and Control of Lead-Based Paint Hazards in Housing</i>
COMMENTS:	It is critical that grantees understand the lead evaluation requirements for OHHLHC grant programs in order to avoid issues that have been identified during grant monitoring visits and file audits.

This policy guidance is being issued to define reporting requirements for lead-based paint inspections and risk assessments for lead-based paint hazards conducted for all grant programs of the Office of Healthy Homes and Lead Hazard Control (OHHLHC) that perform such activities.

The OHHLHC may require more restrictive evaluation and documentation requirements for any grantee that has not demonstrated full compliance with the requirements outlined below.

All OHHLHC grantees that conduct lead-based paint hazard control activities are required to conduct lead-based paint inspections (LI) and lead-based paint risk assessments (RA) in accordance with regulations and guidance of the Environmental Protection Agency (EPA)¹ or EPA-authorized states or tribes,² and the HUD Guidelines for the Evaluation and Control of Lead-Based Paint Hazards in Housing (“HUD Guidelines,” revised in 2012).³

¹ EPA’s lead laws and regulations are at www.epa.gov/lead/laws-regs/policy.html. EPA’s answers to frequently asked questions on lead are at <http://toxics.supportportal.com/link/portal/23002/23019/ArticleFolder/614/Lead>.



HIN Grants require full inspections and assessments for:

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Every owner occupied single family residence

Every rental occupied single family residence

Every vacant/rental single family residence

Every multifamily dwelling of 4 or less attached/detached residential units

Every multifamily dwelling of 5 or more must use the sampling method for FULL assessments as stated in Chapter 5 of HUD Guidelines, page 5-64



Why are OLHCHH Grant requirements for LI/RA different from other HUD programs?

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Other HUD housing programs allow for the presumption of lead, requiring abatement or interim and clearance without an inspection or assessment

The intent and policy of the OLHCHH program is to identify and remove lead based paint **hazards**

OLHCHH requires a **Full LI/RA**

NO Partial, Screens, EBL, OR LI only/RA only

NO presumption of lead is allowed



Lead-Based Paint Inspection

- Surface-by-surface examination of painted or finished surfaces for lead-based paint
- Interior and exterior
- Comprehensive
- Includes intact paint and areas not to be disturbed
- Performed by a certified LBP inspector or risk assessor

Lead-Based Paint Inspection



a. XRF Lead-Based Paint Testing Results

XRF Analytical Sampling Results for ANYPlace USA

No	Time	Type	Duration	Units	Sequence	Component	Feature	Substrate	Color	Side	Condition	Room	Site	Inspector	Results	Depth Index	Action Level	PbC	
1	12/20/2017 10:50	SHUTTER_CAL	190.16	cps	Final														1.92
2	12/20/2017 10:50	PAINT	20	mg / cm ^2	Final							Calibrate	1226	Chapman	Positive	1.19	1	1.1	
3	12/20/2017 10:51	PAINT	20	mg / cm ^2	Final							Calibrate	1226	Chapman	Negative	1.07	1	0.9	
4	12/20/2017 10:51	PAINT	20	mg / cm ^2	Final							Calibrate	1226	Chapman	Negative	1.08	1	0.9	
5	12/20/2017 10:52	PAINT	3.21	mg / cm ^2	Final	Wall		Drywall	Green	A	Intact	Living Room	1226	Chapman	Negative	2.83	1	0.03	
6	12/20/2017 10:52	PAINT	4.93	mg / cm ^2	Final	Wall		Drywall	Green	B	Intact	Living Room	1226	Chapman	Positive	10	1	1.9	
7	12/20/2017 10:53	PAINT	9.25	mg / cm ^2	Final	Wall		Drywall	Green	C	Intact	Living Room	1226	Chapman	Positive	10	1	1.7	
8	12/20/2017 10:54	PAINT	2.47	mg / cm ^2	Final	Wall		Drywall	Green	D	Intact	Living Room	1226	Chapman	Positive	10	1	3.1	
9	12/20/2017 10:54	PAINT	1.69	mg / cm ^2	Final	Crown Molding		Wood	White	D	Deteriorated	Living Room	1226	Chapman	Positive	4.19	1	3.9	
10	12/20/2017 10:55	PAINT	2.64	mg / cm ^2	Final	Baseboard		Wood	White	D	Deteriorated	Living Room	1226	Chapman	Positive	3.14	1	1.6	
11	12/20/2017 10:55	PAINT	1.13	mg / cm ^2	Final	Floor		Wood	Stain	D	Intact	Living Room	1226	Chapman	Negative	1	1	0.01	
12	12/20/2017 10:55	PAINT	0.57	mg / cm ^2	Final	Window	Casing	Wood	White	A	Deteriorated	Living Room	1226	Chapman	Positive	1.9	1	3	
13	12/20/2017 10:55	PAINT	1.13	mg / cm ^2	Final	Window	Sash	Wood	White	A	Deteriorated	Living Room	1226	Chapman	Positive	7.82	1	6.5	
14	12/20/2017 10:56	PAINT	1.13	mg / cm ^2	Final	Window	Stool	Wood	White	A	Deteriorated	Living Room	1226	Chapman	Positive	3.55	1	1.4	
15	12/20/2017 10:56	PAINT	1.13	mg / cm ^2	Final	Fireplace	Mantle	Wood	White	D	Deteriorated	Living Room	1226	Chapman	Positive	3.41	1	2.5	
16	12/20/2017 10:56	PAINT	7.56	mg / cm ^2	Final	Bookcase		Wood	White	D	Intact	Living Room	1226	Chapman	Negative	3.26	1	0.9	
17	12/20/2017 10:57	PAINT	1.13	mg / cm ^2	Final	Door	Casing	Wood	White	C	Deteriorated	Living Room	1226	Chapman	Positive	5.81	1	4.6	
18	12/20/2017 10:58	PAINT	6.05	mg / cm ^2	Final	Door	Jamb	Wood	White	C	Deteriorated	Living Room	1226	Chapman	Positive	5.11	1	1.1	
19	12/20/2017 10:58	PAINT	5.3	mg / cm ^2	Final	Door	Casing	Wood	White	C	Deteriorated	Living Room	1226	Chapman	Positive	3.14	1	1.2	
20	12/20/2017 10:58	PAINT	1.14	mg / cm ^2	Final	Door		Wood	White	C	Intact	Living Room	1226	Chapman	Negative	1.57	1	0.02	
21	12/20/2017 10:59	PAINT	1.13	mg / cm ^2	Final	Door		Wood	White	C	Intact	Living Room	1226	Chapman	Negative	1.8	1	0.01	
22	12/20/2017 11:00	PAINT	8.47	mg / cm ^2	Final	Wall		Drywall	Green	A	Intact	Den	1226	Chapman	Positive	8.64	1	1.1	
23	12/20/2017 11:00	PAINT	1.88	mg / cm ^2	Final	Wall		Drywall	Green	B	Intact	Den	1226	Chapman	Negative	1	1	0	
24	12/20/2017 11:01	PAINT	1.7	mg / cm ^2	Final	Wall		Drywall	Green	C	Intact	Den	1226	Chapman	Negative	1	1	0	
25	12/20/2017 11:02	PAINT	20	mg / cm ^2	Final	Wall		Drywall	Green	D	Intact	Den	1226	Chapman	Positive	10	1	1.1	
26	12/20/2017 11:03	PAINT	4.33	mg / cm ^2	Final	Crown Molding		Wood	White	D	Intact	Den	1226	Chapman	Negative	3.17	1	0.5	
27	12/20/2017 11:03	PAINT	4.92	mg / cm ^2	Final	Baseboard		Wood	White	D	Deteriorated	Den	1226	Chapman	Positive	4.23	1	1	

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The OLHCHH recognizes that windows are costly and therefore require clear justification when being replaced.

Testing of only a single window (or even a few windows) as representing a testing combination for the entire property (interior and exterior) is not allowable.



Policy Guidance 2013-01

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If the LI/RA requires that more than five (5) windows be replaced in a property with the cost charged to OLHCHH grant funds, the assessor must document each window being replaced with either

- a XRF readings from each window, or
- b a clear, high resolution photo of each window, (labeled and location identified) and must include these in the risk assessment report.



Policy Guidance 2013-01

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Windows replaced with lead grant funds must be judged to have lead-based paint hazards, not merely lead-based paint. This distinction is critical and must be clearly defined in the LI/RA.



Policy Guidance 2013-01

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Lead present in items other than painted items, such as unpainted ceramic tile and porcelain bathtubs, does not contain lead-based paint; therefore, removing or treating such items is outside the scope of the authorizing statute for the lead hazard control grants program, and is not eligible for reimbursement to the OLHCHH grant as a lead hazard control activity



Risk Assessment

- Identification of LBP hazards
- Includes
 - ▣ Visual inspection for deteriorated paint
 - ▣ Information on occupant use patterns
 - ▣ Testing of deteriorated paint and possibly other surfaces
 - ▣ Dust sampling
 - ▣ Soil sampling
 - ▣ Reports results and recommendations
- Performed by a certified risk assessor

LIRA Basics

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Only 2 acceptable responses for paint condition
in the inspection report

INTACT
DETERIORATED



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Dust Samples



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“These Guidelines recommend that risk assessors select a minimum of four rooms for dust sampling (except, of course, when the dwelling unit has less than four rooms).”

Page 5-38 of the HUD Guidelines.



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“Dust samples must be collected ‘in all living areas where’ young children “are most likely to come into contact with dust” (40 CFR 745.227(d)(5))

- ▣ Sample the sill and floor from each of such rooms.
- ▣ Must be a representative sample per the Risk Assessor’s judgment.
- ▣ Field Blank



LIRA Basics



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OFFICE OF LEAD HAZARD CONTROL
AND HEALTHY HOMES

Policy Guidance Number:	2017-01	Date:	January 31, 2017
Subject:	Revised Dust-Lead Action Levels for Risk Assessment and Clearance; Clearance of Porch Floors		
Status:	Current		
Applicability:	All Lead-Based Paint Hazard Control (LBPHC) and Lead Hazard Reduction (LHRD) Demonstration Grantees		
Related Guidance:			
Comments:			

Summary:

The Office of Lead Hazard Control and Healthy Homes (OLHCHH) is issuing this policy guidance to establish new and more stringent requirements for dust-lead action levels for its Lead-Based Paint Hazard Control (LBPHC) and Lead Hazard Reduction (LHRD) Demonstration Grantees to use in conducting lead-based paint hazard risk assessments and for clearing units following intervention. This requirement is supported by scientific evidence on the adverse effects of lead exposure at any measurable blood-lead level in children as well as the evidence on the feasibility of lower clearance levels being routinely achieved by lead hazard control programs.

Effective April 1, 2017, all existing OLHCHH LBPHC and LHRD grantees will use the following lead dust hazard and clearance action levels (or lower levels if required by their state regulations):

New Lead Dust Hazard Action Levels:

- Floors: $\geq 10 \mu\text{g}/\text{ft}^2$
- Window Sills: $\geq 100 \mu\text{g}/\text{ft}^2$

New Lead Clearance Action Levels:

- Interior Floors: $< 10 \mu\text{g}/\text{ft}^2$
- Porch Floors: $< 40 \mu\text{g}/\text{ft}^2$
- Window Sills: $< 100 \mu\text{g}/\text{ft}^2$
- Window Troughs: $< 100 \mu\text{g}/\text{ft}^2$

New Lead Dust Hazard Action Levels:

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Composite sampling for the risk assessment and clearance of lead hazards is not authorized under OLHCHH grant programs.



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Check your old reports. If more than 12 months old, perform a new assessment and update your report prior to writing your work specifications



LIRA Basics

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Check your inspector's and assessor's certifications to verify they are current.



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Check your PCS sheet for your XRF to verify it is up to date.



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Composite Soil Sampling

- The risk assessor should determine whether the soil outside of a dwelling poses a significant hazard to children
 - Bare soil areas to be sampled for lead contamination are:
 - Each play area with bare soil.
 - Non-play areas in dripline/foundation areas.
 - Non-play areas in the rest of the yard, including, but not limited to vegetable gardens, pet sleeping areas, and bare pathways.
 - Vegetable gardens (recommended).

Composite Soil Sampling

- Soil samples must be composite samples.
- EPA's standard for lead in soil:
 - ▣ bare soil in play areas = 400 ppm and
 - ▣ non-play areas – 1200 ppm

Scope of Work

- Scope of work must match the lead-based paint hazards identified in the LIRA.
- Activities identified in the scope of work is what the contractor will be held responsible and must be specific.
- For example: designated windows, quantity and unit of measure.



Interim Controls V. Abatement



- **Interim Control** – measures designed to reduce “temporarily” human exposure or likely exposure to LBP hazards.
 - Paint Stabilization
 - Friction and Impact Surface Treatment
 - Dust Control
 - Soil Interim Controls
- **All contractors must have Lead Abatement and RRP Licenses.**
- **All workers must have lead abatement worker and RRP trainings.**

Interim Controls V. Abatement

- **Abatement** – any set of measures designed to “permanently” eliminate lead-based paint or lead-based paint hazards:
 - Paint Removal
 - Enclosure
 - Encapsulation
 - Replacement
 - Removal or “permanent” covering of soil-lead hazards.
- Abatement is performed in compliance with methods and standards under a program authorized by the EPA 40 CFR 745.227 (e)
 - **All contractors must have Lead Abatement and RRP Licenses.**
 - **All workers must have lead abatement worker and RRP trainings.**

Abatement Strategies

COMPONENT REPLACEMENT

- Pros 
 - Quick way to remove LBP
 - Permanent solution
 - Can improve building through upgrades
 - Can lower heating bills and maintenance costs.
- Cons 
 - May involve demolition work
 - PPE may be necessary

Prohibited Practices

(40 CFR 745.227 (e)(6) & 24 CFR 35.140)

- **NO** open flame or torch burning of lead-based paint (LBP)
- **NO** machine sanding, grinding, abrasive blasting, or sandblasting of LBP without a HEPA exhaust control.
- **NO** dry scraping of LBP is permitted *UNLESS*
 - Work is within 1 ft of electrical outlet (*LSHR*), or
 - Treating defective paint spots totaling no more than 2 sq. ft in any one interior room, or
 - Treating a spot no more than 20 sq. ft. on exterior surfaces.
- **NO** use of a heat gun that is above 1100 degrees Fahrenheit, or that chars paint (*LSHR*)
- **NO** use of a volatile stripper in poorly ventilated space.



Lead Poisoning is Preventable!



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