

FY19 NEW GRANTEE ORIENTATION

LSHR vs LHC vs RRP

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Why the Lead Safe Housing Rule

- To protect children in federally assisted and federally owned housing
- To ensure the viability of low-income housing
- Requirements depend on the type and amount of federal housing assistance
- Affects other HUD programs (CDBG, HOME, etc.)

Determination of lead-based paint is present

- EPA-recognized test kits cannot be used to say paint is not lead based paint
- Only a certified lead-based paint lead inspector or risk assessor may determine whether lbp is present

Training Required

- Workers and supervisor must complete a HUD approved curriculum in lead safe work practices
- Only a certified lead-based paint lead inspector or risk assessor may determine whether lbp is present
- Non-certified workers need only on-the-job training if they are supervised by a certified lead abatement supervisor who is also a certified renovator

Material Handout Before Work

- EPA requires renovators to handout Protect Your Family From Lead in your Home (Lead Disclosure Rule) pamphlet

Treating LBP Hazards

- Depending on the amount of HUD assistance, HUD requires that lead based paint hazards be treated using “interim controls” or “on going lead based paint maintenance

Clearance & Notification to Occupants

- HUD requires clearance examination done by independent party
- HUD requires notification be distributed to occupants within 15 days after lead hazard evaluation and lead hazard control activities in the occupant's unit

EPA RRP

Determination that LBP is present

- Certified renovator use an EPA recognized test kit to determine if RRP rule applies or not

Training Required

- Only certified supervisor is required to have classroom training.
- Workers must receive on-the-job training from the certified supervisor
- There must be a certified supervisor on site while work is being conducted

Material Handout Before Work

- Must handout the EPA/HUD Renovate Right: Important Lead Hazard Information for Families, Child care Providers and Schools Pamphlet

Treating LBP Hazards

- Under RRP, EPA requires that work in target housing pre 1978 housing be performed using lead safe work practices

Clearance & Notification to Occupants

- The cleaning verification does not involve sampling and laboratory analysis of dust
- EPA has no requirement to notify residents who are not owners after the work is completed

LHC

Determination that LBP is present

- When using LHC funding it is required to complete a full lead inspection/risk assessment of the entire property including the common area and exterior
- Soil sampling is also required

Training Required

- The workers must have RRP training as well as safe work practices training and be certified to conduct lead hazard control work
- There must be a certified lead supervisor on the work site

Material Handout Before Work

- Must provide the owner Protect Your Family From Lead in Your Home (blue Pamphlet)
- Must provide owner with a copy of the risk assessment/ paint inspection which is to be provided to occupants of rental units by owners

Treating LBP Hazards

- Must provide either interim control or lead abatement to all lead based paint hazards that were identified in the LIRA
- Address lead hazards in the unit, common space, exterior and soil if identified as hazardous

Clearance & Notification to Occupants

- The work must be cleared by certified risk assessor as soon as soon as the work is provided
- Must include a visual and laboratory analysis of the dust in unit
- Clearance report/notification must be given to the owner