U.S. Department of Housing and Urban Development (HUD)
Office of Lead Hazard Control and Healthy Homes (OLHCHH)

2019 Program Manager School

GETTING THE WORK DONE LHC I
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The Work

- Complete the Tier II (APPENDIX A)
- Conduct the Inspection/Risk Assessment (LIRA)
- Prepare the Work Specifications
- Place the job out for bid/bid acceptance/issue the Proceed Order (verify contractors have all required certifications and licensing, including RRP)
LIRA

✓ Lead Paint Inspection: surface-by-surface investigation to determine the presence of lead-based paint.

✓ Risk Assessment: on-site investigation to determine the presence, type, severity, and location of lead-based paint hazards (including lead hazards in paint, dust, and soil) and provides suggested lead hazard control and/or abatement options.

✓ LIRA is valid for one year
Who Can Conduct a LIRA?

✓ Only EPA/State certified Risk Assessor can prepare a Risk Assessment.
✓ Lead Paint Inspection can be conducted by a certified Inspector and a certified Risk Assessor.
✓ Inspector is limited to paint testing only.
✓ Risk Assessment can only be conducted by a certified Risk Assessor.

Note: Generally, most inspectors will obtain both disciplines
Component Testing

✓ Test all painted surfaces.
✓ Typical component types:
  ceiling, walls, a door and casing, window sash, window casings, and any other distinct surface, such as: baseboards, crown molding, and chair rails.
✓ Lead present in unpainted ceramic tiles and porcelain bathtubs does not contain lead-based paint and not eligible for inclusion.
Scope of Work

- Outline the project goals, deliverables, tasks, costs and deadlines.
- Address lead paint hazards identified in the LIRA.
- Determine treatment methods, i.e. abatement, interim controls or a combination.
- Scope of work must correlate to the LIRA.
- Whatever is placed in the scope of work is what the contractor will be held responsible for – must be thorough.
- Be specific – document number of components (i.e. 5 doors), measurement (i.e. sq. ft.), location (i.e. bedroom) and treatment (i.e. paint stabilization/replacement).
- Scope of Work should include the “How” work is to be completed.
<table>
<thead>
<tr>
<th>Characteristic</th>
<th>Interim Controls</th>
<th>Abatement*</th>
</tr>
</thead>
<tbody>
<tr>
<td>Likely duration of control measure</td>
<td>Short Term Measure</td>
<td>Permanent measure (at least 20 years)</td>
</tr>
<tr>
<td>Ongoing monitoring</td>
<td>Necessary in all situations</td>
<td>Limited depending upon action taken</td>
</tr>
<tr>
<td>Federal standards for lead hazard control work</td>
<td>HUD Standards may apply to work done in some federally assisted housing</td>
<td>Yes, EPA standards will require that certain work practices be met</td>
</tr>
<tr>
<td>Cost</td>
<td>Typically less initial cost than abatement, but greater ongoing monitoring costs</td>
<td>Typically greater initial costs than interim controls, but fewer follow-up costs</td>
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</tbody>
</table>

*unable to assist more families.
Contractor Pool

- Maintain an adequate list of certified contractors.
- Confirm contracting firms, supervisors and workers maintain all required certifications and licensing.
- Lead Abatement firm, supervisor and worker certification required for OLHCHH projects.
- EPA Renovation, Repair and Painting (RRP) firm and contractor certification is ALSO required.
Occupant Protection Plan
40 CFR 745.227 & 24 CFR 35.1345)

✓ REQUIRED for abatement
✓ Unique to each project
✓ Describe the measures and management procedures that will be taken during the abatement to protect the occupants from exposure to any lead-based hazards.
✓ Developed prior to abatement in consultation with occupant
✓ Developed by Certified Lead Supervisor or Project Designer
Temporary Relocation

When should occupants be temporary relocated?

✓ the lead hazard reduction and the final cleanup of the work area and adjacent areas cannot be accomplished in one 8 hour working day; and

✓ the areas available for occupancy do not provide sufficient bathroom, kitchen and sleeping facilities and entry egress pathways to meet the needs of the occupants; and

✓ during high dust generating lead activities.
Bidding the Work

- Determine bidding process (i.e. lowest responsive bid, round robin, fixed price, blanket purchase order, etc.)
- Provide contractors with scope of work and LIRA.
- GTR approval for over cost projects (Lead -$20,000; HH $5,000).
- Contract for work should be with contractor, grantee and owner.
- Issue Proceed Order with project completion date (10 days).
- Retain all submitted competitive bids in the case file.
High Cost Units

✓ Lead Hazard Control Projects over $20,000 require GTR approval before signing contracts for work.

✓ Healthy Homes Projects over $5,000 require GTR approval before signing contracts for work.

✓ Submit requests in HHGMS.

NOTE: Failure to get approval could result in a finding from Office of the Inspector General (OIG).