

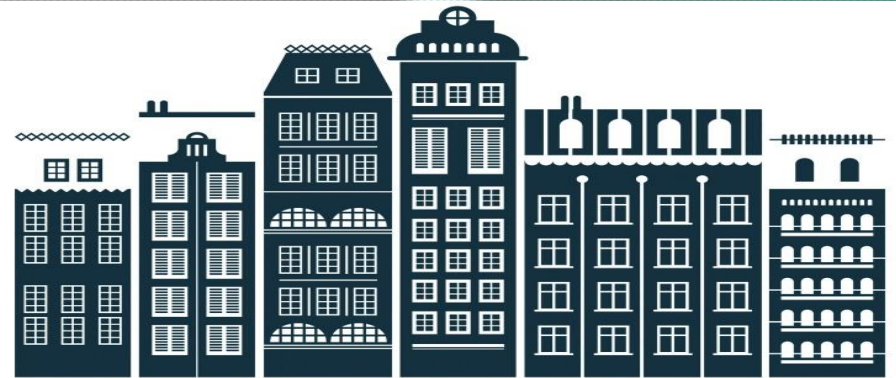
U.S. Department of Housing and Urban Development (HUD)  
Office of Lead Hazard Control and Healthy Homes (OLHCHH)

# FY2021 NEW GRANTEE ORIENTATION

## *Program Implementation*

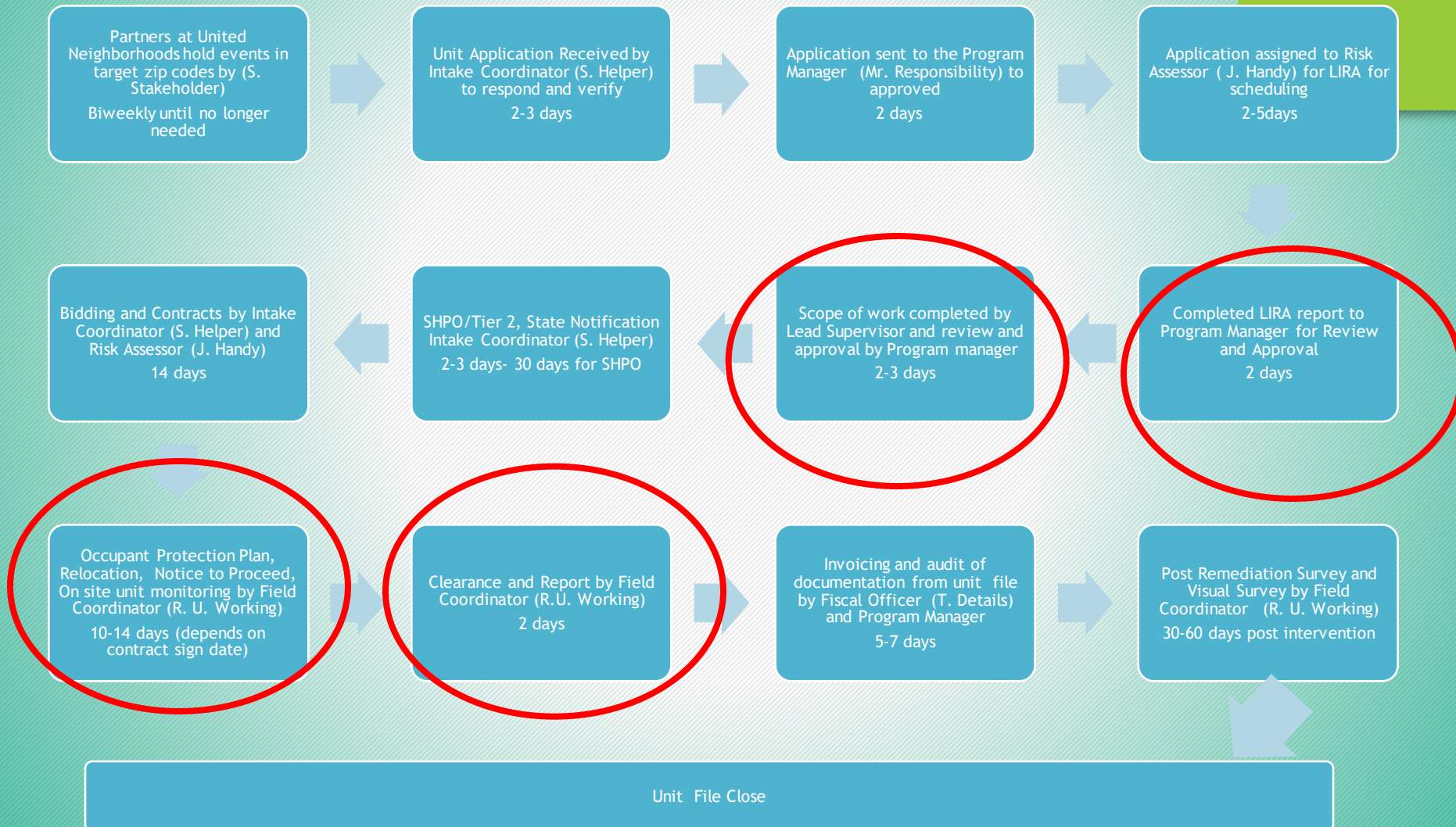
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**VIRTUAL CONFERENCE, MAY 3<sup>RD</sup> – MAY 14<sup>TH</sup>, 2021**

# Process Flow Chart





# TITLE X - Authority

- (a) General Authority. The Secretary is authorized to provide grants to eligible applicants to evaluate and reduce lead-based paint hazards in housing that is not federally assisted housing, federally owned housing, or public housing, in accordance with the provisions of this section.

# Title X - Eligible Activities

- (1) perform risk assessments and inspections in housing;
- (2) provide for the interim control of lead-based paint hazards in housing;
- (3) provide for the abatement of lead-based paint hazards in housing;
- (4) provide for the additional cost of reducing lead-based paint hazards in units undergoing renovation funded by other sources;



# Title X - Eligible Activities

- (5) ensure that risk assessments, inspections, and abatements are carried out by certified contractors in accordance with section 402 of the Toxic Substances Control Act, as added by section 1021 of this Act;
- (6) monitor the blood-lead levels of workers involved in lead hazard reduction activities funded under this section;
- (7) assist in the temporary relocation of families forced to vacate housing while lead hazard reduction measures are being conducted;
- (8) educate the public on the nature and causes of lead poisoning and measures to reduce the exposure to lead, including exposure due to residential lead-based paint hazards;

# Title X - Eligible Activities

- (9) test soil, interior surface dust, and the blood-lead levels of children under the age of 6 residing in housing after lead-based paint hazard reduction activity has been conducted, to assure that such activity does not cause excessive exposures to lead; and
- (10) carry out such activities that the Secretary determines appropriate to promote the purposes of this Act.



# Requirements of Policy Guidance (PG) 2013-01

***“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)<sup>1</sup> or EPA-authorized states or tribes,<sup>2</sup> and the HUD Guidelines for the Evaluation and Control of Lead-Based Paint Hazards in Housing (“HUD Guidelines,” revised in 2012).<sup>3</sup>

<sup>1</sup> EPA’s lead laws and regulations are at [www.epa.gov/lead/laws-regs/policy.html](http://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>.

# Full inspections and assessments required for:

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



# 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

# 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





## **Role and Responsibilities of a Lead Supervisor**

# Roles and Responsibilities Cont'd

## Develops the scope of work for the project from the LIRA:

- Reviews the LIRA to understand which components contain intact lead based paint and which components contain lead paint hazards;
- Determines which remediation option provided by the LIRA is the best fit for project specifications - or can determine another option is the best fit;
- Develops the scope of work to provide the most comprehensive intervention for the funds available;
- Includes in the specifications instructions to the contractor on specific housing conditions/safety concerns/site conditions and other work that may have to be done to successfully complete the job.....



# Roles and Responsibilities Cont'd

- Ensures the property owner/occupants understand the scope of work and how the project will progress.
- Ensures that property owners and occupants are treated fairly and respectfully
  - The Supervisor will review the scope of work with all interested parties prior to the start date and will request input on project timing, flow and needs of the owner, occupants, and partners.
  - Property owners and occupants should be treated fairly by everyone!
  - Particularly by contractors and workers! Owners and Occupants should be treated the same as someone who is paying the bills.
  - A grievance policy should be a part of the contract/scope of work documents.
  - Those who receive funding are commonly afraid to speak up or complain because they think they will be “blacklisted” from future services.

# Roles and Responsibilities Cont'd

- Ensure the contractor shall have paint cans and product labels on site for photograph documentation of actual products used.
- Clearance exam shall be scheduled for most projects at time of interim inspection.
- The worksite shall be contained to prevent safety, health, or environmental hazards, both to those working or living on the property and to the neighboring properties and neighborhood in general.
- The presence or absence of a City inspector does not relieve Contractor from any Contract requirement, and no inspector is authorized to change any term or condition of the Job Order or of the Contract without written authorization from the Project Manager.
- Regulatory inspections or inquiry should be immediately reported to the Project Manager.



# Roles and Responsibilities Cont'd

- May conduct on-site inspection of the project several times;
  - The contractor shall contact the Project Manager when initial containment is complete to inspect for compliance.
  - Depending upon the duration of the project, the Project Manager may conduct an interim inspection
- Inspect containment and occupant protection;
- Review of onsite documents, quality of products and work, adherence to job order specifications; and
- Verify worker identification and protection and document through a written checklist and photos.



# On-going Project Management and Oversight Contractor and Unit work Activities



# Creating a viable 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

# Procurement Process Policy Reference

For more  
details on  
contracting  
requirements,  
please review  
policy .



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

OFFICE OF LEAD HAZARD CONTROL  
AND HEALTHY HOMES

Policy Guidance Number: 2017-04		Date: September 18, 2017
SUBJECT:	Office of Lead Hazard Control and Healthy Homes Grant Procurement Standards	
STATUS:	Current	
APPLICABILITY:	ALL OLHCHH Grants and Cooperative Agreements Fiscal Year 2015 to Current	
RELATED FEDERAL REGULATIONS:	OMB Uniform Guidance: 2 CFR § 200.317 through § 200.326 OMB guidelines on debarment and suspension: 2 CFR part 180 Federal Acquisition Regulations: Parts 6, 13, 14, and 15 OLHCHH Policy Guidance 2017-02, Determining Subrecipient or Contractor Classification	
COMMENTS:		

This Policy Guidance is being issued to provide guidance and instructions on procurement standards and methods to be used by the Non-Federal Entities that are recipients or subrecipients of grants and cooperative agreements (collectively, here, "grants") from the Office of Lead Hazard Control and Healthy Homes (OLHCHH). The OLHCHH's grantee must provide a copy of its procurement policies and procedures to OLHCHH during the grant negotiations.

A Non-Federal Entity must: (1) Provide for the fair and equitable treatment of all persons or firms involved in purchasing; (2) Assure that supplies, equipment or services are procured efficiently, effectively, and at the most favorable prices; (3) Promote competition in contracting; (4) Provide safeguards for maintaining a procurement system of quality and integrity; and (5) Assure that the Non-Federal Entity purchasing actions are in full compliance with 2 CFR § 200.317 through § 200.326, the grant agreement, and OLHCHH's Policies.

## APPLICATION

<https://www.hud.gov/sites/documents/PGI-2017-04.PDF>



# Federal Procurement Process Checklist for Unit-File Reference

Procurement Type Reference <i>OLHCHH Policy 2017-04 Procurement Types</i>  GRANTEE MUST SUBMIT THESE DOCUMENTS RELATED TO THE PROCUREMENT TYPE USED	Blanket Purchase Agreement (BPA) Small (Threshold is 150,000)	Blanket Purchase Agreement (BPA) Large (Threshold is above 150,000)	Small Purchase Procedures (Threshold is 150,000 total or less)	Sealed Bids	Competitive Proposals	Non-Competitive Proposals/ Sole Source
Local Procurement Policy (if not already on file)						✓
Invitation for Bids		✓		✓		
Request for Quotes (RFQ)	✓		✓		✓	
Request for Proposals (RFP)		✓		✓	✓	
Evaluation Method	✓	✓	✓	✓	✓	
Selection Criteria	✓	✓	✓	✓	✓	
Bid Sheet Summary	✓	✓	✓	✓	✓	
Draft or actual Contract/Agreement with Award Amounts	<i>Overall BPA Scope and Limitations of use</i>	✓	✓	✓	✓	✓

## High-Cost Unit

Reminder- Before  
you start the work

- ✓ 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 GTR approval prior to working on high-cost unit could result in no reimbursement of funds



# Project Management, cont'd

Grantees (i.e., Lead Paint Supervisor) are responsible for monitoring job worksites

- ✓ Has the worksite been set up properly and in compliance with Local/State/EPA/HUD regulations, and does the setup appear to be working as planned?
- ✓ Are residents being kept out of the work area?
- ✓ Are workers avoiding the use of prohibited work practices?
- ✓ Is waste being handled correctly?
- ✓ Are workers using worker protection methods appropriate to the job?

# Project Management, cont'd

- ✓ Document all worksite monitoring (findings, corrections made) in the case files.
- ✓ Conduct a visual inspection of the project to ensure all work has been completed in accordance with the Scope of Work before scheduling clearance testing.



# Project Begins

## Bidding the Work:

- ✓ 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 the contractor, grantee and owner.
- ✓ Issue Proceed Order with project completion date (10 days)
- ✓ Retain all submitted competitive bids in the case file. File retention: at least 3 years from the end of the award's period of performance.

## Occupant Protection Plan 40 CFR 745.227 & 24 CFR 35.1345)

- ✓ REQUIRED for abatement (refer to State Guidelines, as well)
- ✓ Developed by a Certified Lead Supervisor or Project Designer and in consultation with the occupant.

# Safe Work Practices To Protect Applicants

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

During high dust generating lead activities.

Helpful videos on safe work practices :

**Exterior Work Practices:**

<https://livestream.com/DHSWebcast/events/5317405/videos/130918491>

**Interior Work Practices:**

<https://livestream.com/DHSWebcast/events/5317405/videos/130909037>



## DAILY Work Site Checklist

Start work date: \_\_\_\_\_ Projected End date: \_\_\_\_\_

Unit Address:
Date:
Time:
Contracting Company:

	YES	NO	N/A
Badges worn while working			
All Personal Protective Equipment (PPE) worn			
Work site properly set up (floor & furniture covered, ventilation system covered)			
HEPA VACCUMS ON SITE			
EVIDENCE OF PROPER CLEANING PRODUCTS (TSP, ETC)			
PROPER CONTAMINATION & BARRIER SYSTEMS (CONTROLLING LEAD HAZARDS PROPERLY)			
THREE-BUCKET CLEANING SYSTEM			
Designated eating area			
Designated decontamination area			
Warning signs at all Entrances and Exits			
Waste storage container (w/warning sign)			
Work area roped off from public			
Shut off and locked electric box (w/warning sign)			
Any workers smoking			

Photos taken at site (Y or N) \_\_\_\_\_

Scope of work for the day (LIST OR ATTACH SOW with highlighted day's work):

[illegible]

# Clearance Testing Purpose

The purpose of clearance is to test the containment methods used and ensure safety of the unit prior to re-occupancy.

The expectation is the unit will receive a full clearance which means the sampling must be randomized and include both rooms that work was done and not done, entry ways, and exterior visuals. PLUS PORCHES!!!

Area(s) determined to be high risk/high use areas for children.



# Clearance

- **A report on work done should contain the following information:**
  - The address or location of the property or structures to which the report applies;
  - The start and completion dates of the work;
  - The name, address, and certification type and number of each firm or organization conducting the work, and the name(s) of supervisor(s) / certified renovator(s) assigned to the work;

# Clearance Action Levels ( $\mu\text{g}/\text{sf}$ )

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## Lead Clearance Standards ( $\mu\text{g}/\text{sf}$ )

	<u>Action Level</u>
• Floors	< 10
• Window Sills	< 100
• Window Troughs	< 100
• Porch Floors	< 40



# Porch Floor Clearance

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## Porch Floor Clearance Action Level: <40 µg/sf

- Applies to exterior porches on any side of the home
- Porch floors' lead dust:
  - Loading increased after lead hazard control work
  - Can expose children by direct contact or track-in
- Note: A porch used as a living area and reasonably protected from the exterior environment (e.g., having exterior doors and/or window(s), and a roof or ceiling) is an interior space and is assessed and cleared that way

## Post Remediation

- ✓ Provide the owner with all documents (LIRA, Scope of Work, Clearance Test Results).
- ✓ Provide the owner with an On-going Maintenance Plan.
- ✓ Conduct at least one reevaluation of project to monitor the effectiveness of hazard control methods used.



# On-Going Maintenance Disclosure Example

## II. On-Going Monitoring & Maintenance Acknowledgement

DATE: June 6, 2017

PHONE: \_\_\_\_\_

PROPERTY OWNER(s): \_\_\_\_\_ (LL)

PROPERTY OWNER(s): \_\_\_\_\_ (LL)

PROPERTY ADDRESS: \_\_\_\_\_

I/We, the undersigned, have been informed by the CityXXXXX of Unit of the need for on-going monitoring of the completed remediation and/or improvements made to your home.

I/We understand that it is the responsibility to upkeep all areas and continue to use lead-safe practices in order to stop the spread of any lead dust or debris that may be present in the home. (Especially homes built Pre-1978)

I/We further understand that it is my/our responsibility to monitor and maintain all work completed in order to keep the housing unit safe and secure. An inspector has conducted a final inspection to ensure that the work was completed in compliance with the work specifications. By following the recommendations of the inspector this will help to ensure the house will be properly maintained. It is the purpose of these guidelines to provide the homeowner with a decent, safe and sanitary home to live in, following this maintenance plan will help keep repairs and upgrading of systems up to regulations.

Owner(s) 4 ( 4 7 ) 1 4 / 4 / 1

6-27-17

Date Y//1114t.

Az\ 1-7

C  
HNRS

# Unit Work Recap Checklist for Program Managers



- ✓ Check your old reports. If more than 12 months old, perform a new risk assessment and update your report prior to writing your work specifications;
- ✓ Check your inspector's and risk assessor's, lead firm, supervisor and worker certifications to verify they are current;
- ✓ Check your PCS sheet for your XRF to verify it is up to date
- ✓ Confirm the Scope of Work for LHC interventions correlates with the lead hazards (LBP, dust and soil) identified in the LIRA and incorporates recommended remediation options.
- ✓ Monitor work in progress.
- ✓ Achieve a final Clearance that can be paid by grant funds
- ✓ Failed Clearances should be paid by the contractor as best practice
- ✓ Provide owner with all documentation and an on-going Maintenance Plan.



# Project Close-Out

## The Lead Paint Supervisor is responsible for:

- Submitting final documents to the state.
- Required Documents:
  - The Contractor shall provide copies to the City before payment
    1. the State Notification of Lead-Based Paint Activity form with proof of submittal
    2. the Occupant Protection Plan
    3. the completed Abatement Report with proof of submittal
    4. the log of all personnel/workers who conducted work at the particular unit.
    5. the project specific Worker Protection Plan

# Project Close-Out

## Cont'd:

- Provides the property owner with a copy of the final scope of work and clearance report that shows where the lead hazards were addressed and that clearance was achieved.
- Required to provide a maintenance plan for continued monitoring of intact lead-based painted components.
- Occupants cannot re-occupy the work area(s) and/or entire home until clearance is achieved.





# Questions and Answers