



OFFICE OF LEAD HAZARD CONTROL
AND HEALTHY HOMES

Policy Guidance Number: 2016-02	Date: October 28, 2016
Subject:	Clarification on Identifying and Addressing Lead in Drinking Water
Status:	Current
Applicability:	All OLHCHH Lead-Based Paint Hazard Control and Lead Hazard Reduction Demonstration grantees
Related Guidance:	<ul style="list-style-type: none">Residential Lead-Based Paint Hazard Reduction Act of 1992 (Title X)
Comments:	See PG 2016-01 Use of Healthy Homes Supplemental Funds

The Office of Lead Hazard Control and Healthy Homes (OLHCHH) is issuing this policy guidance to provide clarification on the eligibility of activities related to the identification and remediation of lead in drinking water under OLHCHH lead hazard control grant programs (i.e., the Lead-Based Paint Hazard Control and Lead Hazard Reduction Demonstration grant programs) as authorized by the Residential Lead-Based Paint Hazard Reduction Act (Title X).

Identification of Lead in Drinking Water

Testing of drinking water for the presence of lead is permitted as an optional component of a complete Lead Inspection/Risk Assessment, provided that the water testing protocol followed is aligned with the EPA standards set forth in the Lead and Copper Rule as part of the Safe Water Drinking Act. For example, if you elect to include water testing you must collect samples according to the available standardized testing methods, as identified in 40 CFR 141.86(a). For more information on the EPA water testing requirements, please see their website at: <https://www.epa.gov/dwreginfo/lead-and-copper-rule>.

Controlling Lead in Drinking Water Using Lead-Based Paint Hazard Control Funds

The use of lead-based paint hazard control funding (Including LHC and LHRD grants) to address lead in drinking water is not authorized because Title X does not cover lead in water. Therefore, the use of these funds to control any hazards that are not lead-based paint hazards (e.g., unpainted portions of glazed bathtubs, mini-blinds, tiles, etc.) is statutorily prohibited. Grantees who wish to undertake these controls may do so using funds from non-HUD sources or from Healthy Home Supplement Funds as described below; these funds shall not be considered as match or leverage for Lead Hazard Control Grants.

Addressing Lead in Drinking Water Using Healthy Homes Supplement Funds

The use of Healthy Homes Supplement funding to address lead in drinking water is permitted, provided the hazard is identified through the use of the Healthy Homes Rating System and any associated technical assessment results (see Identification section above). The approach and justification for addressing lead in drinking water needs to be provided for review and approval by the assigned Government Technical Representative. Any such activities would also be required to align with the proposed healthy homes supplement approach, work plan, and policies

and procedures documents. Examples of interventions may include installation of water filtration devices, replacement of faucets or aerators, replacement of indoor plumbing and/or services lines. Given the limited amount of funding available to each grantee for health and safety hazard remediation, it is important to consider the cost of each proposed activity in relation to the benefit to the family, property, and community.

As a reminder, if using the Healthy Homes Supplemental funds, projects planned to be \$5,000 or greater for a home require prior GTR review and approval. (This may particularly arise for replacement of lead service lines.) If hazards from lead in water are to be addressed; the work plan must be specified and prioritized and include the cost for intervention in an eligible scope of work.

Please consult with your assigned Government Technical Representative if you have any further questions.