# Lead-Based Paint Regulations: Subpart H, L and M

Subpart L Public Housing





#### **Trainers**

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# **Series Overview**

### **Goals for this Training Series**

- Gain a deeper understanding of the Federal Lead-Based Paint Regulations
- Introduce key terms
- Determine the types of HUD assistance and/or HUD programs that trigger the requirements of Subparts H, L or M
- Review the key documentation requirements (i.e. evaluation, hazard control, notification, ongoing maintenance, continuing compliance)
- Provide a tour of the available resources





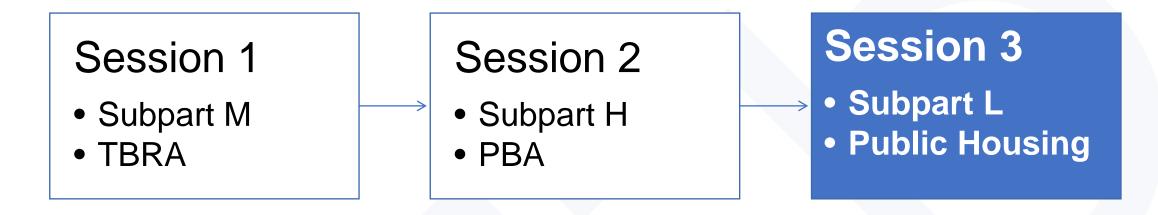
#### **Webinar Series Format**

- Three hours today to review materials
- One hour tomorrow for answering questions
  - With exercises (as applicable)
- Links of recordings will be available





#### Webinar Series Agenda



You do not need to attend all the sessions. Only attend for the activities that you work on.





#### **Handouts**

- LSHR Definitions
- Lead Disclosure Rule
- EPA's Renovation, Repair and Painting Rule
- Summary of Lead Based Paint





## How experienced are you with the lead regulations?

A. I am new to applying lead regulations

B. I have some experience with applying lead regulations

**C.** I know how to perform all the key steps in the lead-based paint compliance process

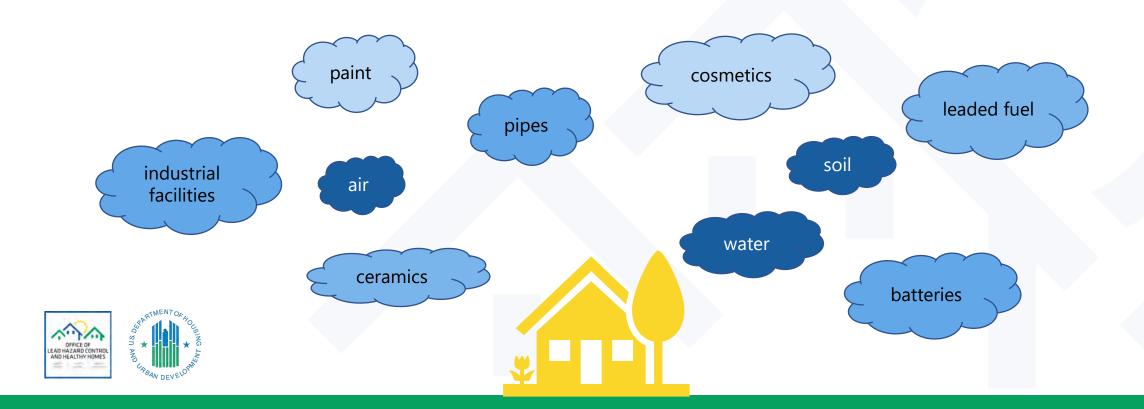




# Lead Safe Housing Rule Basics

### **Defining the Problem**

- Lead is a naturally occurring element and in manufactured products
- Found in all parts of our environment:



## Defining the Problem

#### Who is at highest risk?

#### Children under age 6

- Bodies absorb more lead are more sensitive to effects than adults
- More likely to accidentally ingest lead

#### **Pregnant women**

 Elevated blood lead level can expose the developing child

#### **Certain workers**

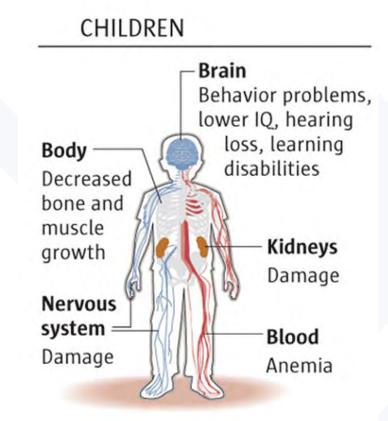
 Workers in certain construction and industrial fields may be exposed to high levels of lead – prevent "take-home" exposure





#### Children and Exposure to Lead

- How do children get lead in their blood?
  - Putting objects in their mouths
  - Playing in soil or floors with lead dust from friction and impact surfaces (doors, windows)
  - Eating paint chips
- What is the "trigger level" of lead in a child?
  - o HUD: 5 μg/dL
  - o CDC: 3.5 μg/dL



#### What does lead do to your brain?

https://www.pbs.org/video/what-does-lead-poisoning-do-to-your-brain-aptmbo/





## Lead Safe Housing Rule (LSHR)



#### **PURPOSE**:

To protect children in assisted target housing through <u>primary prevention</u>

Target Housing defined: Any housing constructed prior to 1978, except housing for the elderly or persons with disabilities or any zero-bedroom dwelling (unless any child who is less than 6 years of age resides or is expected to reside in such housing).





#### **Lead Regulations Apply Except When:**

- Property constructed after January 1, 1978
- Zero-bedroom units and SROs\*
- Housing designated exclusively for the elderly (62 years old or older) or persons with disabilities\*
- Properties found to be lead-free by a LBP inspection or where all LBP has been identified, removed, and clearance achieved

\*Exemption does not apply if a child under six years of age resides or is expected to reside in the dwelling unit





#### **Lead Regulations Apply Except When:**

- An unoccupied property that is to be demolished, provided that it remains unoccupied until demolition
- Emergency Action necessary to protect life, health and safety, or further damage to the structure (e.g., after a natural disaster or fire)
  - o This exemption DOES NOT APPLY to restoration/rehabilitation of such damaged property





# Limited Exception from Lead Safe Work Practices and Clearance

- Maintenance and repair activities that do not disturb painted surfaces
- Lead safe work practices are not required when minor maintenance or activities disturb painted surfaces that are less than de minimis\* levels:
  - o 2 sq. ft. per interior space
  - 10% of small component type
  - o 20 sq. ft. for exterior work

\* Note: HUD de minimis levels are more protective than the EPA RRP guidelines





#### **Federal Lead Regulations**

HUD – 24 CFR Part 35

- Subpart A: Lead Disclosure Rule
- Subpart B: General LSHR Requirements & Definitions
- Subpart H, J, K, L, M: LSHR Program 
   Requirements
- Subpart R: LSHR Methods and Standards

EPA – 40 CFR Part 745

- Subpart F: Lead Disclosure Rule
- Subparts D, L, Q: Lead-Based Paint Activities Rule
- Subparts E and Q: Renovation, Repair, and Painting (RRP) Rule

**Note:** HUD uses the confirmed blood lead level of 5 μg/dL, while the CDC recently lowered the reference value to 3.5 μg/dL. HUD will continue to take action for confirmed blood lead levels at 5 μg/dL at this time.





#### **Federal Lead Regulations**

## HUD/EPA's Lead Disclosure Rule

- Applies to almost all housing, public and private, built before 1978.
- Effective March 1996 (except exemptions mentioned earlier)

## HUD's Lead Safe Housing Rule (LSHR)

- Applies to almost all Federally assisted and Federally-owned housing built before 1978.
- Effective
   September 2000

#### EPA's Renovation, Repair, and Painting (RRP) Rule

- Applies to almost all target housing, public and private, built before 1978, including childoccupied facilities such as schools and day-care facilities.
- Effective April 2010





## **HUD Regulation Subparts**

Subparts	Assistance Type	Program
A	Disclosure of Known Lead-Based Paint Hazards Upon Sale or Lease of Residential Property	All
В	General Requirements and Definitions	All
C D	Disposal of Housing Project-Based Rental Assistance	Non-HUD Federal
F	HUD-Owned Single Family Property	SF Hsg
G	Multifamily Mortgage Insurance	MF Hsg
Н	Project-Based Assistance	Hsg, PIH
ı	HUD-Owned and Mortgagee-in-Possession Multifamily Property	MF Hsg





## **HUD Regulation Subparts by Programs**

Subparts	Assistance Type	Programs
J	Rehabilitation	All
K	Acquisition, Leasing, Support Services, or Operation	CPD, PIH
L	Public Housing Programs	PIH
М	Tenant-Based Rental Assistance	PIH, CPD
R	Methods and Standards for Lead-Based Paint Hazard Evaluation and Hazard Reduction Activities	All
E, N-Q	Reserved	





## Public Housing: Subparts and Applicable Programs for 24 CFR 35

Subpart	Assistance	Programs
L	Public Housing	Public Housing Programs – U.S. Housing Act of 1937, Section 9





### **Key Definitions (ref. §35.110)**

- Target Housing built before 1978, with some exceptions
- Lead-Based Paint Hazards
  - Deteriorated LBP
  - Dust with lead-levels at or above the dust-lead hazard standard
  - Soil with lead-levels at or above the soil-lead hazard standard
  - o Friction, impact or chewable surfaces with LBP and an associated dust-lead hazard
- Lead-Based Paint paint or other surface coatings that contain lead equal to or exceeding 1.0 mg/cm<sup>2</sup>

#### Resource – Lead Definitions Handout

https://files.hudexchange.info/resources/documents/LSHR-Lead-Definitions-Handout.pdf





## **Designated Party for LSHR Response**

• Designated Party: Responsible for applicable LSHR requirements

Subpart L	Public Housing	PHA
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#### **Key Actors**

#### Owners and Managers

- May include in-house inspection and maintenance personnel
- Maintenance and repair contractors
- o Renter Intake
- Program staff
  - o Intake Staff
  - Inspector (may be trained as RA)
  - Compliance Staff
  - Finance staff
- Lead specialists
  - o Certified paint inspectors, risk assessors (RA), and clearance examiners
  - o Certified or trained lead contractors, lead abatement supervisors, and RRP workers





#### **Role of Property Managers**

Property managers play a key role in lead safety too

- o EPA will enforce LBP safety requirements against property managers
- o RRP applies to property management companies
- o <a href="https://www.epa.gov/newsreleases/epa-hold-building-managers-responsible-lead-based-paint-safety-requirements">https://www.epa.gov/newsreleases/epa-hold-building-managers-responsible-lead-based-paint-safety-requirements</a>

Property managers = anyone supporting the maintenance role (PHA, management companies





## Public Housing: Key Steps in LBP Compliance Process











TELL



#### **DISCLOSE**

Pamphlet

Paint inspection

**LOOK** 

Risk assessment



- Interim controls
- Hazard abatement



- Clearance
- Notification
- Ongoing maintenance
- Periodic reevaluation





## **Public Housing Summary of LBP Requirements**

	Conventional Public Housing
	[Subparts A, B, L & R]
Disclosure (almost all pre-1978 units regardless of occupancy)	PHA is responsible for providing Protect Your Family pamphlet, disclosure form, and available records and reports to residents at initial occupancy, when their lease is renewed with changed terms, and/or when their lease is renewed after new information on LBP or LBP hazards becomes available.
Exemptions	See list of property exemptions under the Lead Safe Housing Rule
Approach to Lead Hazard Evaluation and Reduction	Identify and abate all lead-based paint and lead-based paint hazards during physical improvements at modernization. Until modernization, use interim controls and follow ongoing maintenance.
Pre-Renovation Education (EPA Req.)	Entity performing modernization, repair, renovation or lead hazard reduction must provide EPA RRP Renovate Right Pamphlet to residents prior to start of work.
Lead Evaluation	Paint Inspection and Risk Assessment  Notice to occupants describing results of Paint Inspection and Risk Assessment
Lead Hazard Reduction	Abatement when comprehensive modernization conducted; use interim controls until abatement is performed  Safe work practices & occupant protection  Work must be performed by personnel with proper training, supervision, and/or certification (i.e., for abatement, a certified lead-based paint abatement firm with certified abatement supervisor(s) and workers, and for RRP, a certified renovation firm with certified renovation supervisor(s) and workers)
Clearance and Notice	Clearance is required following abatement, interim controls, and paint stabilization (unless area controlled or stabilized is de minimis)  Notice to occupants describing hazard reduction activities including clearance.
Ongoing Maintenance	Annual visual assessment to check for failure of lead hazard reduction work or defective paint.  Safely repair deteriorated paint (unless no LBP present) and pass clearance. Safely repair any failed lead hazard reduction work, pass clearance, and provide notice to residents.
Periodic Re-evaluation	Yes, by a certified lead risk assessor. Conducted within 2 years of hazard reduction activity and repeated 2 years later. End after two consecutive reevaluations without finding LBP hazards or failure of encapsulations or enclosure.
EBLL Requirements	If a child discovered with an EBLL, promptly notify HUD, verify if not reported by a health care provider, notify health dept., conduct an environmental investigation and use interim controls or abatement to address hazards. Conduct Risk Assessment on other assisted units with a child under age 6 residing or expected to reside and perform interim controls or abatement to address hazards, clearance, notification to residents and ongoing maintenance.

#### Responsibilities for Costs Associated with Lead

There are costs related to testing and treating lead-based paint hazards.

The following are responsible for paying these costs:

o Public Housing: Public housing agencies

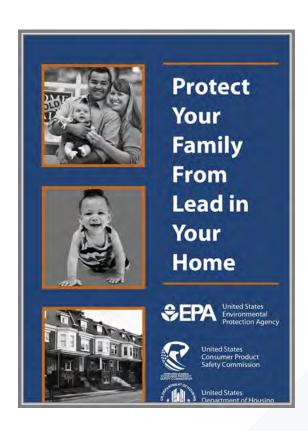




Step 1. Disclose

Lead Disclosure Rule

#### **Lead Disclosure Rules**



- Applies to almost all pre-1978 for sale and rental units
- The Owner or Lessor:
  - Provides Pamphlet
  - Provides warning statement
  - Disclose KNOWN information
- Must be completed BEFORE any contract is signed





### **Disclosure Exemptions**

#### Disclosure is exempt for the following:





Sales of target housing at foreclosure



LBP Free

Found LBP free by a certified inspector (For leases)



**Short Term Lease** 

100 days or less where no lease renewal/extension can occur



## **Previously Disclosed**

Lessor previously disclosed all information required and no conditions have changed





## The Wrong Disclosure

#### **NOTIFICATION**

#### Watch Out for Lead-Based Paint Poisoning

#### The interiors of older homes and apartments often have layers of lead-based paint on the walls, ceilings, window sills, door paint and primers may also have been used on outside porches, railing, garages, fire escapes and lamp posts. When be a real danger for babies and young children. Children may eat paint chips or chew on painted railings, win? around. Children can also ingest lead even if they do not specifically eat paint chips. For example, when c' or dust particles containing lead, they may get these particles on their hands, put their hands into their Lead poisoning is dangerous-especially to children under the age of seven (7). It can event Symptoms of Lead-Based Paint Poisoning Has your child been especially cranky or irritable? Is he or she eating normally? Do miting? Does he or she complain about headaches? Is your child unwilling to play? These may be signs of lead poisoning at all. Because there are no symptoms does not mean that you should not be concerned if you believe your Advisability and Availability of Blood Lead Level Screening If you suspect that your child has eaten chips of paint or someone told you our child to the docu If the test shows that your child has an elevated blood lead level, treatment is available. Contact health department for her, Lead screening and treatment are available through the Medicaid Program for those who hild is certified as having an e. l, you should immediately notify the Community Development or other agency to wi ord is applying for rehabilitation as ry steps can be taken to test your unit for lead-based paint hazards. If your unit doe nt, you may be eligible for assistance to Precautions to Take to Prevent Lead-Based Paint Poisoning You can avoid lead-based paint poisoning by performing some prev Look at your walls, ceiling, doors, door frames and there places where the paint is peeling, flaking, chipping, or powder some things you can do immediately to protect your child (a) Cover all furniture and appliances; (b) Get a broom or stiff brush and remove all loose pieces of pair

- in newspaper. Put these packages in the trash can. DO NOT BURA (c) Sweep up all pieces of paint and plaster and put them in a pap
- (d) Do not leave paint chips on the floor in window wells. Damp dowsills in and around the work area to remove all dust and paint particles. Keeping these areas clear of paint chips, dust and dirt is easy:
- (e) Do not allow loose paint to remain within your children's reac pick loose paint off the lower part of the walls.

Homeowner Maintenance and Treatment of Lead-Based Paint H. As a homeowner, you should take the necessary steps to keep your ho Vater leaks from faulty plumbing, defective roofs and exterior holes or breaks may admit rain and damoness into the interior of your home. T ige walls and ceilings and cause paint to peel, crack or flake. These conditions should be corrected immediately. Before repainting, all surf cracking, chipping or loose should be thoroughly cleaned by scraping or brushing the loose paint from the surface, then repainting with two ( paint. Instead of scraping and repainting, the surface may be covered with other material such as wallboard, gypsum, or paneling. Bew sed paint is removed by scraping or sanding, a dust is created, which may be hazardous. The dust can enter the body either by breathing 1 use of heat or paint removers could create a vapor or fume which may cause poisoning if inhaled over a long period of time. Whenever of lead-based paint should take place when there are no children t eliminate the hazard. Remember that you as an adult play a or pregnant woman on the premises. Simple painting over defective lead-base major role in the prevention of lead poisoning. Your actions and awareness abo. nake a big difference.

#### Tenant and Homebuyer Responsibilities

You should immediately notify the management office or the agency through which yo if the unit has flaking, chipping, powdering or peeling paint, water leaks from plumbing, or a defective roof. You should co-operate wit.

I have received a copy of the Notification entitled "Watch Out. isoning" AND I have received a copy of the pamphlet, "Protect Your Family From

Printed name of recipient	Date	_
Signature of recipient	_	

Exhibit V

After carefully reading this notice, please detach this receipt and return it to your local housing authority, landlord, management office, or community development office.

RECEIPT

have received a copy the notice entitled:

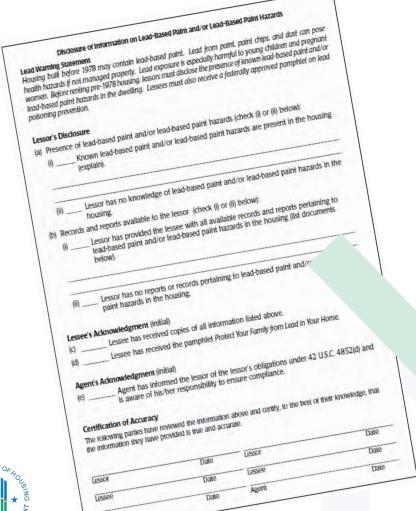
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#### **The Correct Disclosure**



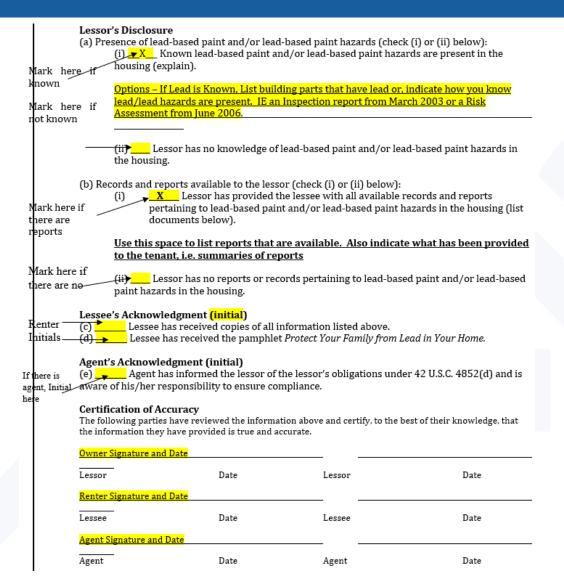






States with modified disclosure form: MA, RI, DC

#### The Correct Disclosure







#### **Tenant Information - Tracking Children Under 6 Years Old**

#### Responsibility for:

- Owner tracking children residing in unit
- o Tenant informing owner about an elevated blood lead level child residing in the unit

Activity	Requirement
Public Housing	PHAs are <b>encouraged</b> to track occupants with children under 6 years of age and request tenants to inform them if and when their child has an EBLL.

Resource - Owner's Guide to Identifying and Tracking Occupants and Expected Occupants
<a href="https://files.hudexchange.info/resources/documents/LSHR-Owners-Guide-to-Identifying-Tracking-Occupants-Under-Six-Years-Old.pdf">https://files.hudexchange.info/resources/documents/LSHR-Owners-Guide-to-Identifying-Tracking-Occupants-Under-Six-Years-Old.pdf</a>





#### **Tenant Instructions**

The owner/landlord/PHA is **required to** instruct tenants to inform them of any deteriorated paint in the unit or common areas

The owner/landlord/PHA can also instruct tenants to inform them of:

- Children under 6 years old who are occupants or expected to reside (and EBLL cases)
- Encouragement to retain "Protect Your Family from Lead in Your Home"

Resource - Owner's Guide to Identifying and Tracking Occupants and Expected Occupants:

https://files.hudexchange.info/resources/documents/LSHR-Sample-TBRA-PBA-Resident-Instructions.pdf





# **Documentation**

- ✓ Disclosure Form
- ✓ Tenant instructions





# **Knowledge Check**

#### **True or False?**

**Scenario:** At lease renewal the owner needs to provide the disclosure notice again to the tenant. There has not been any changes to the household or the unit.





Step 2. Look

LBP Evaluation

#### LBP Evaluations

There are multiple types of LBP evaluations. The ones you must complete depends on the activity.

- o For all, the personnel completing the evaluation must be certified
- Visual assessment: Inspector identifies deteriorated paint, paint chips, dust, and other debris
- Lead-based paint inspection: Determine if painted surfaces contain LBP using methods such as an XRF analyzer or lab analysis
- Risk assessment: Identifies LBP hazards through sampling of deteriorated paint, dust, bare soil (risk based), water (optional)





# **Evaluation Methods per Subpart L**

PHAs were required to do **Lead Inspections (LI)** and **Risk Assessments (RA)** when LSHR came out in 2000 and conduct full abatement of all units at modernization.

If **LI** and **RA** is on file, lead abatement was conducted, **and** unit is certified as LBP free

No lead evaluation required (exempt)

If **LI** and **RA** is on file, lead abatement was conducted **but** unit not certified as LBP free

Visual Assessment (VA) required at unit turnover

If **LI** and **RA** is on file and only interim controls were conducted

Visual Assessment (VA) required at unit turnover

If nothing is on file

LI and RA required





# **Evaluation Methods per Subpart L**

#### LBP inspection and risk assessment

- At bi-annual re-evaluation (Risk Assessment)
- Must use certified personnel

#### **Visual Assessment**

- At tenant request or unit turnover
- Every other year for ongoing maintenance (more later)

#### **Resource – Log of Visual Assessments**

https://files.hudexchange.info/resources/documents/LSHR-Visual-Assessments-Findings-Resolution.pdf





# Finding Appropriate Firms and Individuals

- RFP/RFQ should include specific information on:
  - License and certification requirements
  - Type of evaluation to be performed: Risk assessment, inspection, clearance, or combination
  - See <u>HUD Guidelines</u> for more information
- Some grantees and property owners/managers report they can not find trainers, contractors, paint inspectors, risk assessors, or clearance technicians they need
  - Locate <u>Certified Renovation Firms</u> and <u>RRP Training Providers</u> from EPA's <u>Lead homepage</u>
    - Some states have their own RRP Programs. See state agency for more info.
  - o Contact the local entitlement (CDBG/HOME) grantee for referrals
  - o Contact Lead-Based Paint Hazard Control Grantees





# Locate Certified Lead Dust Sampling Technician Firms

#### Find a Firm

To find your nearest EPA certified firm, first select the type of company you're looking for (renovator or evaluation), then please enter either a complete address, or a Zip Code, or a City and State.

#### Discipline:

Renovator

Dust Sampling Technician

https://cfpub.epa.gov/flpp/pub/index.cfm?do=main.firmSearch



Location:





#### **Visual Assessment**

- An inspection by a trained personnel to identify deteriorated paint, paint chips, dust and other debris
- Online HUD Visual Assessment training is recommended for all housing counselors and inspectors – Easy and Important! <a href="https://apps.hud.gov/offices/lead/training/visualassessment/h00101.htm">https://apps.hud.gov/offices/lead/training/visualassessment/h00101.htm</a>
- Keep records (copy to owners, and occupants recommended)
- Documentation: <u>Visual Assessment Findings and Resolution Record</u>
  - o Date of inspection
  - Document rooms and surfaces with deteriorated or damage paint in unit, common, and exterior areas
  - Consider taking pictures





# **Lead-Based Paint Inspection**

- On-site investigation conducted by a certified lead inspector or risk assessor paint that will determine:
  - Whether lead-based paint is present in a house, dwelling unit, residential building, housing development, or child-occupied facility, including common areas and exterior surfaces
- If lead is present, it also determines:
  - Which building components contain lead-based paint.
  - The amount of lead in the XRF sample.
- A LBP Inspection does not identify where the LBP hazards are, or where lead-dust or soil lead hazards exist.





Lead Based Paint Inspection Highlights Video

#### **EPA Regulations for LBP Inspection**

LBP inspections must follow HUD, EPA, and state/local regulations

#### 24 CFR 35.1320

• (a) Lead-based paint inspections and paint testing. Lead-based paint inspections shall be performed in accordance with methods and standards established either by a State or Tribal program authorized by the EPA under 40 CFR 745.324, or by the EPA at 40 CFR 745.227(b) and (h). Paint testing to determine the presence or absence of lead-based paint on deteriorated paint surfaces or surfaces to be disturbed or replaced shall be performed by a certified lead-based paint inspector or risk assessor.





# New EPA Dust Hazard Standards Effective 1/6/2020 (Effective for EPA Authorized States 1/6/2022)

Media	New Lead Level – Risk Assessment	Old Lead Level – Risk Assessment
Paint	1 mg/cm <sup>2</sup>	1 mg/cm <sup>2</sup>
Dust (wipe sampling only; single- surface or composite) Carpeted Floors Hard Floors Interior Window Sills	10 μg/ft <sup>2</sup> 10 μg/ft <sup>2</sup> 100 μg/ft <sup>2</sup>	40 μg/ft <sup>2</sup> 40 μg/ft <sup>2</sup> 250 μg/ft <sup>2</sup>
Bare Soil:  Bare soil in play areas  Bare soil in non-play areas	400 ppm (μg/g) 1,200 ppm (μg/g)	400 ppm (μg/g) 1,200 ppm (μg/g)
Water (optional) – first draw, 250mL	20 ppb (µg/L)	20 ppb (μg/L)





#### Find out if you work in an EPA Authorized State:

https://www.epa.gov/lead/lead-abatement-inspection-and-risk-assessment

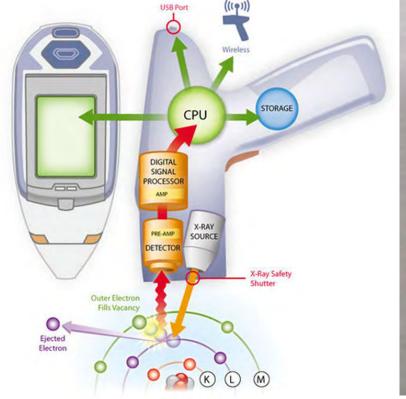
#### **Risk Assessment**

- On-site investigation to determine the existence, nature, severity, and location of LBP hazards
  - Must be conducted by a certified risk assessor
- Visual inspection to locate deteriorated paint, including extent and causes
- Background information on physical characteristics of dwelling and occupants' patterns that may cause LBP exposure to child < 6 years of age</li>
- Test for presence on each friction or impact surfaces with deteriorated paint
- Dust samples from windowsills and floors
- Soil samples





# X-Ray Refractive Fluorescence (XRF) Device









# What is in a Risk Assessment Report?

A risk assessment report by the certified risk assessor or firm conducting the risk assessment explaining the results of the investigation and options for reducing LBP hazards

#### The report includes:

- Summary of the property, basic inspection information, and results
- Full explanation of testing methodology and results
- Lead hazard control plan
- Detailed laboratory analysis forms and data including XRF data

View details on the Risk Assessment Report Checklist





#### **Lead Hazard Evaluation Notice**

- Single-family buildings
  - Full report is provided directly to homeowner
  - If unit is tenant occupied, tenant receives notice of evaluation
- Multifamily buildings
  - Distribute to each household or post in central location where all residents can access it
  - Notice and reports of all evaluations must be made available to residents if requested.
- Notice must be provided within 15 days after results determined.

# LEAD HAZARD EVALUATION NOTICE – SAMPLE FORM Address: \_\_\_\_\_\_ Evaluation Completed (circle one): Paint Inspection Paint Testing Risk Assessment Date: \_\_\_\_\_ Summary of Results: \_\_\_\_\_ No lead-based paint or lead-based paint hazards were found. \_\_\_\_\_ Lead-based paint and/or lead-based paint hazards were found. See attachment for details





#### Resource – Lead Hazard Evaluation Notice

https://files.hudexchange.info/resources/documents/LSHR-Lead-Hazard-Evaluation-Notice-Sample-Form.pdf

#### **Documentation**

- ✓ Certification of personnel who completed evaluation
- √ Visual assessment findings and resolutions log
- √ Report of LBP Inspection and/or Risk Assessment
- ✓ Lead Hazard Evaluation Notice





Step 3. Treat

LBP Hazard Reduction

# Lead Hazard Reduction & Treatment (Certifications Required)

#### **Paint Stabilization**

 Set of measures designed to remove and repair loose paint and damaged areas

#### **Interim Controls**

 Set of measures designed to reduce temporarily human exposure or likely exposure to leadbased paint hazards

#### **Abatement**

- Set of measures designed to <u>permanently</u> eliminate lead-based paint hazards
- Can be combined with interim controls





# Public Housing: Lead Hazard Reduction & Treatment

Abatement, use interim control until abatement is performed

#### **Interim Controls**

- Includes paint stabilization, dust removal, preventative maintenance, treating some or all of friction and impact surfaces and covering contaminated bare soil
- Must be completed by certified RRP certified contractors and renovators, abatement workers, and abatement contractors and supervisors

#### **Abatement**

- Removal of lead-based paint and dustlead hazards, the permanent enclosure or encapsulation of lead-based paint, the replacement of components or fixtures painted with lead-based paint, and the removal or permanent covering of soillead hazards
- All preparation, cleanup, disposal, and post abatement clearance testing activities associated with such measures.
- Must be completed by certified abatement workers, contractors, and supervisors





#### **Contractor Selection for Hazard Reduction Work**

Staff check
 Qualifications



**Certifications** 



References



- Contractors submit bids for work
- Program may opt to maintain list of pre-qualified lead contractors

**Note:** It is the law (EPA RRP) that contractors are trained and certified if they work on any pre-1978 housing and/or child-occupied facilities regardless of funding source.





# EPA Renovation, Repair and Painting Rule (RRP)

Contractors performing RRP projects that disturb lead-based paint in homes, childcare facilities and pre-schools built before 1978 must:

- o Have their firm certified by EPA or an EPA authorized state
- Use certified renovators trained by EPA-approved training providers
- Follow lead-safe work practices
- o Provide "Renovate Right" pamphlet
- o VIOLATIONS: Civil Money Penalties \$41,056 /unit









# Locate RRP Certified Renovator and Program Training Providers

Location:

123 Main St., Anytown, ME, 20460

Example:

20460
 Anytown, ME

Maine

50

in miles

State:

Select a State

Firm Name:

**Certification Number:** 

Example: NAT-1681-2

Search Firms

Distance:

#### **RRP Certified Renovator**

https://cfpub.epa.gov/flpp/pub/index.cfm?do=main.firmSearch

#### Find a Firm

To find your nearest EPA certified firm, first select the type of company you're looking for (renovator or evaluation), then please enter either a complete address, or a Zip Code, or a City and State.

#### Discipline:

Renovator

Dust Sampling Technician

\_\_\_\_ AND \_\_\_\_

#### **RRP Program Training Providers**

https://cfpub.epa.gov/flpp/pub/index.cfm?do
=main.firmSearchAbatement

#### **Find a Course**

To find available training course(s), first select the course, discipline and language, then select a state, from/to date range, and discipline. Additional training may be available, use the "Find a Trainer" tool and contact trainers regarding other course offerings.

#### Course:

Initial

Refresher

#### Discipline:

\_\_\_\_ Renovator

Dust Sampling Technician





# LSHR and RRP: Planning and Setting-Up

Requirement	HUD Lead Safe Housing Rule (LSHR)	EPA Renovation, Repair and Painting Rule (RRP)
Determination that LBP is present	Certified LBP inspector or risk assessor (not EPA testing kits)	Certified renovators use an EPA- recognized test kit
Training	All workers and supervisors must complete a HUD-approved curriculum in lead safe work practices. Renovation firms must be certified. At least one certified renovator must be at the job or available when work is being done.  Exception: Non-certified renovation workers need only on-the-job training if they are supervised by a certified LBP abatement supervisor who is also a certified renovator	<ul> <li>EPA or <u>EPA authorized States</u> certify renovation firms and accredit training providers that certify renovators.</li> <li>Only the certified renovator is required to have classroom training.</li> <li>Workers must receive on-the-job training from the certified renovator.</li> </ul>
Pre-Renovation	HUD requires conformance with EPA regulations, including EPA's Pre-Renovation Education Rule	Education Renovators must hand out the Renovate Right:  Important Lead Hazard Information for Families, Child  Care Providers and Schools pamphlet.





# LSHR and RRP: Work required

Requirement	HUD Lead Safe Housing Rule (LSHR)	EPA Renovation, Repair and Painting Rule (RRP)
Treating LBP hazards	Depending on type and amount of HUD assistance, lead hazards are treated using "interim controls" or "ongoing lead-based paint maintenance"	EPA generally requires that renovations in target housing be performed using lead safe work practices
Prohibited Work	HUD prohibits 6 work practices:	EPA prohibits 3 work practices:
Practices	<ul> <li>EPA's 3 prohibited work practices plus</li> <li>Heat guns that char paint</li> <li>Dry scraping or sanding farther than 1 ft. of electrical outlets</li> <li>Use of a volatile stripper in poorly ventilated space</li> </ul>	<ul> <li>Open flame burning or torching</li> <li>Heat guns above 1100 degrees F</li> <li>Machine removal without HEPA vacuum attachment</li> </ul>
Threshold	HUD has a more protective interior de minimis	EPA's interior threshold for minor repair and
minimum amounts	threshold than EPA for lead safe work practices. HUD	maintenance activities is higher than HUD's de minimis
of interior paint	also uses this lower threshold for clearance and	threshold.
disturbance which trigger lead activities	occupant notification.	





# LSHR and RRP: After work completed

Requirement	HUD Lead Safe Housing Rule (LSHR)	EPA Renovation, Repair and Painting Rule (RRP)
Confirmatory Testing	HUD requires a clearance examination done by an independent, 3 <sup>rd</sup> party instead of the certified renovator's cleaning verification procedure	EPA allows cleaning verification by the renovator or 3 <sup>rd</sup> party clearance examination. The cleaning verification does not involve sampling and laboratory analysis of the dust.
Notification to Occupants	HUD requires the designated party to distribute notices to occupants within 15 days after lead hazard evaluation and control activities in/of their unit (and common areas, if applicable)	EPA has no requirement to notify residents who are not the owners after the renovation





# **Who Completes Abatement**

- Certified abatement contractors and supervisors complete abatement
  - Abatement workers (If supervised by an abatement contractor)
- Completely removes lead-based paint or controls surfaces with treatments having a 20-year life expectancy
  - o Removing lead-based paint and its dust
  - o Permanently encapsulating or enclosing surfaces that contain lead-based paint
  - o Removing/Replacing components that contain lead-based paint
  - Removing or permanently covering lead-contaminated soil





#### Using Lead Safe Work Practices - Must be Documented

- Lead Safe Work Practices are detailed methods for:
  - Controlling dust and debris
  - Using approved methods and worker protection
  - Protecting occupants
  - Segregating the work area and HVAC
  - Limiting access with possible relocation
  - Cleaning effectively
- Work wet, clean wet, clean with HEPA
- Must be followed by formal third-party Clearance inspection and Notice to residents

RRP Training Providers: <a href="https://cfpub.epa.gov/flpp/pub/index.cfm?do=main.firmSearchAbatement">https://cfpub.epa.gov/flpp/pub/index.cfm?do=main.firmSearchAbatement</a>





#### **Key Resources: Safe Work Practices**

- Safe Work Practices: Renovate Right Brochure
- Control Dust, Segregate Work Area and HVAC, Work wet, Clean wet, Clean w/ HEPA vac
- Interpretive Guidance
  - o #S4: Lead Safe Units
  - o #R13: Interim Clearance
- Forms
  - o Post-Work Checklist for Lead Hazard Reduction Activities
- HUD Guidelines Chapter 8 Resident Protection and Worksite Preparation





# Occupant Protection During Lead Hazard Reduction

- Occupants and their belongings must be protected during lead hazard reduction work
  - Include requirements in any statement of work for contractor (if applicable)
  - o May include leaving the unit or temporary relocation until clearance is achieved
- Temporary unit must be lead-safe
  - o Use post 1978 units, or
  - Perform a clearance examination to document unit free of hazards
- For short term relocation the tenants could be housed in a hotel/motel and provided with meal vouchers
  - Longer timelines will require the temporary unit to be functionally equivalent
  - Multifamily rental projects can be staged to treat vacant units and then shift residents onsite





# When is Relocation Required?

#### Relocation required:

- When tenants required to be out of the unit and cannot return until clearance is achieved
- If work area can be contained but resident will be restricted from needed parts of unit (kitchen, bathrooms) for more than an 8-hour workday

#### Resources

- Interpretive Guidance #J24: Elderly Consent
- Guidance on Relocation

#### Relocation is **not** required:

- Work does not disturb paint
- Interior work completed in 1 period of 8 daytime hours
- Only exterior is treated
- Occupants have safe access to unit;
   treatment completed in 5 calendar days
- Elderly occupants, after consent





#### Protection of Occupants' Belongings and Worksite Preparation for Projects with Lead Hazard Reduction Activities

Pro	ty Address: Owner:
Na	of Individual Completing this Form:
Or	zation:
Da	completed:
Ins	tions: Check all activities performed to protect occupants' belongings and prepare the worksite.
	er or not temporary relocation of occupants is required before and during lead hazard reduction activities, rksite must be carefully prepared and occupants' belongings protected. Check all that apply.
	cupants were appropriately notified that their belongings would be protected during the work and what, if ything, they would need to do to prepare for the project.
	cupants' belongings in the containment area were (check one):
	relocated to a safe and secure area outside the containment area.

# Find more information in the Post-Work Checklist for Lead Hazard Reduction Activities:

https://files.hudexchange.info/resources/documents/LSHR-Post-Work-Checklist-for-Lead-Hazard-Reduction-Activities.pdf

# Occupant Protection in Lead Hazard Reduction

#### **Documentation**

- ✓ Certification of personnel who completed hazard reduction
- ✓ Post-Work Checklist for Lead Hazard Reduction Activities
- √ Occupant Protection (if applicable)
- ✓ Project Monitoring
- ✓ Inspection Notes
- ✓ Statement of Work





Step 4. Clear

# **Clearance – Documented by Certified Personnel**

- Hazard reduction work is only complete upon passing a Clearance Examination
  - o Assures work was done as specified and site is clear of hazards
- Abatement work clearance must be performed by a certified risk assessor or lead-based paint inspector
- Non-abatement work clearance can be done by a certified risk assessor or lead-based paint inspector or sampling technician (supervised and signed off by such)
- No conflict of interest
  - Clearance examiners must be independent from hazard control, rehabilitation, or maintenance work
  - May work for same firm that provides pre-work paint testing or risk assessment
- Interim Clearance to allow for non-lead workers to enter site is allowed, but Final Clearance is required





# Clearance (cont.)

#### Includes:

- Visual assessment to determine completion of work, absence of hazards
- o Dust sampling, (processed by accredited lab) to measure residual lead-dust levels
- Interpretation of sampling results
- o Preparation of a report with certification included

#### If site fails:

- Worksite must be re-cleaned and
- Another clearance test conducted
- Additional work may be needed if continued clearance failure



<u>Lead-Based Paint Clearance Examination Highlights</u>
<u>Video</u>





# Clearance (cont.)

- Dust wipe samples must be collected (by certified risk assessor/inspector or his/her clearance technician) and submitted to an accredited laboratory for analysis
- LBP hazard control is not complete until clearance testing is performed and passed

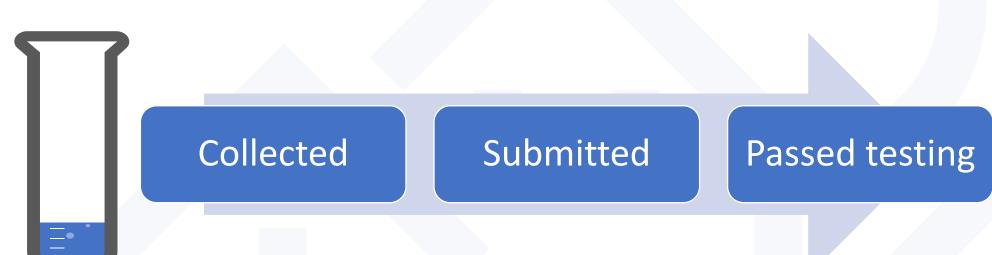
#### **Dust Clearance Levels**

Carpeted Floors 10 µg/ft<sup>2</sup>

Hard Floors 10 μg/ft<sup>2</sup>

Interior 100 µg/ft<sup>2</sup>

Windowsills







# **Documentation**

- ✓ Certification of personnel who completed clearance
- ✓ Clearance Report





Step 5. Tell

## **Notice of Hazard Reduction includes Clearance Results**



Occupants must receive a Notice of Hazard Reduction, within 15 days of completion of the work (pass Clearance)

- o Activities performed
- o Clearance Date
- o Tech's ID Info, Contact info
- Visual Inspection Results
- Dust/Locations/µg/sf
- o Lab ID + #
- Reduction Dates
- o LBP Remaining
- o Contractor ID





# **Lead Hazard Reduction Notice**

# **Sample Notice of Lead Hazard Reduction** Property Address:\_\_\_\_\_ Today's Date:\_\_\_\_\_ **Summary of the Hazard Reduction Activity:** Start Date:\_\_\_\_\_ Completion Date: Location and type of activity. (List the location and type of activity conducted or attach a copy of the summary page from the clearance report or the lead hazard scope of work providing this information.) Date(s) of clearance testing: Summary of results of clearance testing: No clearance testing was performed. https://files.hudexchange.info/resources/documents/LSHR-Sample-Notice-of-Lead-Hazard-Reduction.pdf

Property Address:	Today's Date:		
Summary of the Hazard Red			
start Date: Completion Date:			
	y. (List the location and type of activity conducted or attach a copy of the report or the lead hazard scope of work providing this information.)		
Date(s) of clearance testing:			
Summary of results of clearance tes	sting:		
(a) No cleara	No clearance testing was performed.		
(b) Clearance	e testing showed clearance was achieved.		
(c) Clearance	e testing showed clearance was not achieved.		
	ad-based paint that remain in the areas where activities were conducted. e.g. kitchen-door, bedroom-windows).		
Person who prepared this s			
	31.935		
Title:			
Address:			
Phone:	Fax:		
Frione.			

#### **Documentation**

- ✓ Lead Hazard Reduction Notice
- ✓ Updated Disclosure Notice to provide tenant at lease renewal





# Ongoing Maintenance and Periodic Re-evaluation

# **Ongoing Maintenance**

Remaining LBP	If any LBP remains after the lead hazard reduction, ongoing monitoring must be included as part of ongoing building operations to ensure that interim controls have not failed	
Disclosures	Issued to new tenants prior to the execution of a lease along with the disclosures required with testing and clearance	
Records	Maintained to document the initial lead hazard reduction or abatement work completed on all units and the ongoing efforts to maintain compliance	
Deteriorated Paint	Identified by the visual inspection on interior and exterior surfaces located on the residential property shall be stabilized unless tested to determine it is not lead paint	
Bare Soil	Treated with interim controls except for bare soil tested and determined no lead hazard	
Safe Work Practices	Used when performing any maintenance or renovation work that disturbs LBP and clearance achieved	
Failed Enclosure	Encapsulation or enclosure of LBP that have failed will need to be addressed and clearance achieved	





#### Public Housing: Ongoing Maintenance & Periodic Revaluation

Maintain the unit and common areas lead safe for continued occupancy.\* Lead safe means no deteriorated lead paint or failed hazard control methods.

Who	Public housing agency	
What	<ol> <li>Ensures a certified assessor conducts visual assessments or risk assessment, depending on the year</li> <li>Responds to and clears new or deteriorated LBP hazards identified in the assessment</li> <li>Repairs any failure of abatement methods such as encapsulation or enclosure controls</li> <li>Written notice asking residents to report deteriorated paint and any failure of encapsulation or enclosure</li> </ol>	
When	Visual assessments at unit turnover and every twelve months, whichever is sooner	

Year After Hazard Reduction Work Completed	Type of Assessment Required	Notes
1	Visual Assessment	
2	Risk Assessment	If no hazards are identified, no response is required. Repeat in two years.
3	Visual Assessment	
4	Risk Assessment	If no hazards in first and second reevaluations, subsequent reevaluations can be discontinued.
5	Visual Assessment	
6	Visual Assessment	Visual Assessment allowed moving forward.





\*Not required if LBP was completely removed

#### **Documentation**

- ✓ Report of any new evaluation
- ✓ Report of any new hazard reduction
- ✓ Clearance report
- ✓ Certification of all personnel who completed work
- ✓ Disclosure Notice (updated)





# Elevated Blood Lead Levels (EBLL) Response

## **EBLL Response Summary**

- Once a child has been reported with an EBLL,
  - o A verification and an Environmental Investigation (EI), must be carried out promptly.
  - Verifications, notifications, and additional unit evaluations may also be required as determined by the EI of the unit where the child with the EBLL resides (the index unit).
- If hazards are found, the other covered units in the property occupied by children under 6 years old have requirements requiring prompt action and recordkeeping.

#### Resource – Guide for Responding to a Report of a Unit with Child with EBLL

https://files.hudexchange.info/resources/documents/LSHR-Owner-Guide-for-Responding-to-Report-of-an-Assisted-Unit-Occupant-Child-6-with-an-EBLL.pdf





# **Key Terms**

- Index Unit: A housing unit where a child with an elevated blood lead level resides
- Other Covered Units: Federally-assisted housing units in the property where a child under 6 years old lives or is expected to live.
- **Designated Party:** A federal agency, grantee, subrecipient, participating jurisdiction (PJ), housing agency, Indian tribe, tribally designated housing entity (TDHE), sponsor, or property owner responsible for complying with applicable requirements





# Public Housing: EBLL Response

Activity	Timing	Documentation	PHA
Verification, when necessary	ASAP		<b>√</b>
Initial notification of confirmed case to HUD OLHCHH, HUD FO & public health dept.	5 business days after verification		✓
Environmental Investigation (may be done by public health dept.)	15 calendar days after verification		
Notification to residents	15 calendar days after results	Notice of evaluation	✓
Lead hazard control on index unit	30 calendar days after EI result		<b>√</b>
Risk assessment and lead hazard control on other covered units	30-60 calendar days*		✓
Clearance after work completed	30 calendar days after EI result 90 calendar days for > 20 units		✓
Notification of clearance	10 business days to HUD FO 15 calendar days to residents	Notice of clearance	✓
Notify HUD FO with documentation that activities are conducted	10 business days of deadline of each activity		✓
Ongoing maintenance	Ongoing		✓
SERTMENT OF THE OFFICE OF THE	* Risk assessments of other covered units mus	st be conducted within	





<u>leadregulations@hud.gov</u>

- 30 calendar days for a property with ≤ 20 other covered units
- 60 calendar days for a property with > 20 other covered units

#### **EBLL Resources**

#### Available LSHR Amendment Trainings

HUD offers two different trainings that provide an explanation of how Public Housing Agencies (PHAs), grantees, and owners respond to cases of EBLLs in children less than 6 years old living in a federally assisted housing unit.



#### Tenant-Based Rental Assistance

This training is intended for PHAs, grantees, and owners involved with Tenant-Based Rental Assistance (TBRA) programs (LSHR Amendment Subpart M). TBRA includes any relationship where HUD funding for rental is connected with a specific tenant such as a voucher program.

View the LSHR TBRA Training



#### Public Housing and Project-Based Assistance

This training is intended for PHAs, grantees, and owners involved with administering conventional public housing (LSHR Amendment Subpart L) and Project-Based Assistance (PBA) rental programs (LSHR Amendment Subpart H). These programs cover HUD funds that are connected with a housing unit rather than a particular tenant.

View the LSHR PBA Training

https://www.hudexchange.info/trainings/lead-based-paint/lshr/

#### Lead-Based Paint Family Interview for Environmental Investigations Highlights

Learn about the family interview that is a key component of the lead-based paint (LBP) environmental investigation (EI) when a child tests positive for an elevated blood lead level conducted. The EI is conducted by a certified LBP risk assessor. This video provides information on the purpose, timing, and tips for how to complete a successful interview.



<u>Family Interview for</u> El Highlights Video

#### Amended Lead Safe Housing Rule Video Series

This video series is an hour long presentation on the amended Lead Safe Housing Rule (LSHR). It describes Public Housing Agencies' (PHA) responsibilities for responding to cases of elevated blood lead levels (EBLLs) in:

- · Public Housing Units
- Housing Choice Voucher (HCV) Units
- · Project Based Voucher (PBV) Units

Each program's set of videos includes 3 videos covering:

- The Basics: introduces the key acronyms, notification requirements, and responsible party for EBLL response.
- Index Unit: describes the requirements for verification, notification, investigation, control and clearance, and ongoing maintenance and reevaluation for the unit in which a child with an EBLL resides (index unit)
- Other Covered Unit(s): describes the required action steps to be taken in other units covered by the LSHR (other covered units) when a child residing on the property is found to have an EBLL

Additional resources to accompany this training can be accessed via HUD's Lead-Based Paint Resources for Public Housing Authorities.

For comments or other technical assistance needs, please email leadregulations@hud.gov.

#### Get Credit Instructions

View instructions on how to get credit for this training.



Introduction to the Amended LSHR Video Series - All Programs

This video introduces the dangers and history of lead paint in the environment, and the basic terms and definitions of the LSHR.





https://www.hudexchange.info/trainings/lead-based-paint/lshr/video-series/

#### **Documentation**

- ✓ Verification of child with EBLL
- ✓ Environmental investigation report
- ✓ Notification to residents of EBLL
- ✓ Risk assessment report
- ✓ Clearance report
- ✓ Notification of lead hazard reduction
- ✓ Certification of all personnel who completed work

#### Resource - Respond to a Child with EBLL Module

https://www.hudexchange.info/programs/lead-based-paint/lshr-toolkit/respond-to-a-child-with-an-ebll/





# Program Administration and Monitoring

#### **Program Administration and Review**

#### Staff Knowledge

Provide training as needed and demonstrate that staff are knowledgeable about HUD's LSHR, the EPA RRP rule, and local program procedures for recordkeeping

# Lead Safe Work Practices

Use video, pictures and on-site inspections to show work is completed using Lead Safe Work Practices anytime a painted surface larger than the de minimis amounts are disturbed

# **Occupant Protection**

Document that temporary relocation required by the LSHR relocates tenants to units free of lead hazards and their belongings are protected

#### **Monitoring**

Document a consistent assessment of projects except for units that qualify for an exemption





# **Achieving Staff or Contractor Capacity**

- Grantee or subrecipients need adequate LSHR knowledge to oversee procurement and implementation of projects triggering the LSHR
- Program can hire outside paint inspectors or risk assessors or have staff certified
- Procured capacity will trigger federal procurement following an RFP/RFQ process
- Grantees determines staffing for visual assessments, risk assessments, clearance testing, and the delivery of all required notices
- Staffing includes oversight of temporary relocation and ongoing monitoring





## Owners and PMCs Must Manage & Monitor

- Follow procedures for completion of all required items
- Follow procedures and standards for the approval of contractor invoices, encouraging submission of documents and photographs and on-site and/or video inspection for files
- Institute periodic review by third party monitor
- For states and other remote grantees, update procedures to require electronic transmission of documents and video inspections

More information in Ch. 24 of CPD Monitoring Handbook for LSHR





#### **Documentation**

Every pre-1978 property should have a dedicated LSHR compliance file documenting all evaluations, reduction work, and notices

✓ Including certification of firms, contractors, or program staff

#### **Resource – LBP Document Checklist**

- <a href="https://files.hudexchange.info/public/resources/documents/LSHR-LBP-Checklist-PBA-Single-Family-and-Multi-family-Under-5000-Per-Year.pdf">https://files.hudexchange.info/public/resources/documents/LSHR-LBP-Checklist-PBA-Single-Family-and-Multi-family-Under-5000-Per-Year.pdf</a>
- https://files.hudexchange.info/resources/documents/LSHR-Lead-Based-Paint-Document-Checklist-PBA-5000-or-More-Unit-Year.pdf
- <a href="https://files.hudexchange.info/resources/documents/LSHR-Lead-Based-Paint-Document-Checklist-TBRA.pdf">https://files.hudexchange.info/resources/documents/LSHR-Lead-Based-Paint-Document-Checklist-TBRA.pdf</a>





# Available Resources

# **HUD Exchange Lead-Based Paint Page**



Home > Programs > Lead-Based Paint



#### Lead Safe Housing Rule Toolkit

The tools in the Lead Safe Housing Rule Toolkit help practitioners understand and comply with the federal lead rules. Use it to learn about preparing to administer projects, implementing key project tasks, and keeping records for compliance.

View Toolkit



#### Lead-Based Paint Resources

- Lead Definitions Handout
- Lead Disclosure Rule
- LSHR-Renovation, Repair, and Painting Rule (RRP) Handout
- Guidelines for the Evaluation and Control of Lead-Based Paint Hazards in Housing
- Office of Lead Hazard Control and Healthy Homes

View more resources



#### Lead Exposure

What do I do if I think my child or I have been exposed to lead?

Talk to your pediatrician, general physician, or local health agency about what you can do. Your doctor can do a simple blood test to check you or your child for lead exposure.

View the Protect Your Family from Lead in the Home pamphlet, Childhood Lead Poisoning Prevention Program, or contact the National Lead Information





# Lead Safe Housing Rule (LSHR) Toolkit

https://www.hudexchange.info/ programs/lead-basedpaint/lshr-toolkit/introduction/



#### **Lead Safe Housing Rule Toolkit**



#### Introduction

The tools in the Lead Safe Housing Rule Toolkit help practitioners understand and comply with the federal lead rules. The rules apply to almost all ownership, rentals, and sales of pre-1978 housing regardless of occupants or federal assistance to keep children and families safe from lead.

#### **Lead Rules Basics**

If you are new to the lead regulations, review Lead Rules Basics.

Choose the type of activity you are working in, or operating, to access the tools and information for that activity. If you are not sure which applies to you, view Which Subpart Do I Use?

#### Project-Based Assistance (PBA): Subpart H with A, B, and R

PBA rules and tools apply to rental properties receiving ongoing assistance that reduce occupants' rents. Assistance is tied





#### **Evaluating Lead-Based Paint in HUD-Assisted Housing Videos**

https://www.hudexchange.info/pr ograms/lead-basedpaint/evaluating-lead-based-paintin-hud-assisted-housingvideos/#inspection



#### **Lead-Based Paint Inspection Highlights**

Learn the basics of how to complete a lead-based paint inspection in accordance with HUD's Lead Safe Housing Rule from certified lead risk assessors/inspectors and HUD's Office of Lead Hazard Control and Healthy Homes (OLHCHH). A lead-based paint inspection is used to determine and report the presence and location of lead-based paint in target housing.



#### Recording

#### Additional Resources

- HUD Guidelines for the Evaluation and Control of Lead-Based Paint Hazards in Housing (Chapter 7)
- XRF Performance Characteristics Sheets (PCS)
- Table 7.3 Number of Units to be Tested in Multi-family Building or Developments



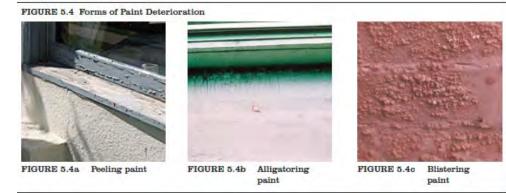


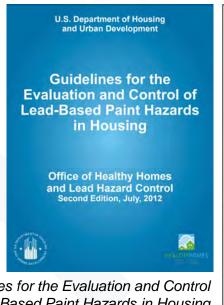
#### **Guidance and Performance Criteria**

#### **HUD** Guidelines for the Evaluation and Control of Lead-Based Paint Hazards in Housing

o OLHCHH has published two editions of the Guidelines, a technical manual for lead hazard evaluation and control in federally-assisted housing; cited by EPA in its lead rules as a "documented methodology."

https://www.hud.gov/program\_offices/healthy\_ho mes/lbp/hudguidelines





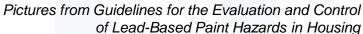




FIGURE 5.5 Baseboard showing a de minimis amount of deteriorated paint.







# Lead Safe Housing and Healthy Homes Mailing List

#### Go to <a href="https://www.hudexchange.info/mailinglist/">https://www.hudexchange.info/mailinglist/</a>

# Email Updates Sign up to receive email updates on HUD policy guidance, training opportunities, resources, critical deadlines, program support, and more. Privacy Statement: When you register for a mailing list, we won't share your email address with anyone outside HUD, For more information, read the HUD Exchange Website and Privacy Policies. Sign Up Now! Update your preferences Unsubscribe

# Subscribe to Email Updates Email Address \* Zip Code I'd like to receive email updates about: | 811 Capital Advance | Lead Safe Housing and Healthy Homes

#### <u>Update Your Preferences</u>

- IDIS Integrated Disbursement and Information System
- Lead Safe Housing and Healthy Homes
  - Multifamily Housing Preservation





## **Upcoming Trainings – November/December 2022**

Elevated Blood Lead Level (EBLL) LSHR Amendment Training

Audience	Webinar	Office Hour
TBRA	Tuesday, November 15 1:00 – 3:00 PM ET	Thursday, November 17 1:00 – 2:00 PM ET
Public Housing and PBA	Tuesday, December 6 2:00 – 4:00 PM ET	Wednesday, December 7 2:00 – 3:00 PM ET

Register through the HUD Exchange. Registration email sent through Lead Safe Housing and Healthy Homes Mailing List.





#### Resources

- Lead Regulations: http://portal.hud.gov/hudportal/HUD?src=/program\_offices/healthy\_homes/enforcement/regulations
- Lead Safe Housing Rule (LSHR) Training: <a href="https://www.hudexchange.info/trainings/lead-safe-housing-rule/">https://www.hudexchange.info/trainings/lead-safe-housing-rule/</a>
- EPA page: <a href="https://www.epa.gov/lead">https://www.epa.gov/lead</a>
- Interpretive Guidance on LSHR: <a href="https://portalapps.hud.gov/CORVID/HUDLBPAdvisor/info/documents/LSHRGuidance21June04.htm">https://portalapps.hud.gov/CORVID/HUDLBPAdvisor/info/documents/LSHRGuidance21June04.htm</a>
- Lead-Based Paint: <a href="https://www.hudexchange.info/programs/lead-based-paint/">https://www.hudexchange.info/programs/lead-based-paint/</a>
- Lead Safe Housing Rule Toolkit: <a href="https://www.hudexchange.info/programs/lead-based-paint/lshr-toolkit/introduction/">https://www.hudexchange.info/programs/lead-based-paint/lshr-toolkit/introduction/</a>
- Evaluating LBP in HUD-Assisted Housing Videos: <a href="https://www.hudexchange.info/programs/lead-based-paint/evaluating-lead-based-paint-in-hud-assisted-housing-videos">https://www.hudexchange.info/programs/lead-based-paint-in-hud-assisted-housing-videos</a>
- PIH Notice 2017-13: <a href="https://www.hud.gov/sites/documents/17-13PIHN\_OHHLHC.PDF">https://www.hud.gov/sites/documents/17-13PIHN\_OHHLHC.PDF</a>





Contact OLHCHH: <u>leadregulations@hud.gov</u>

Q&A

#### **Disclaimer**

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