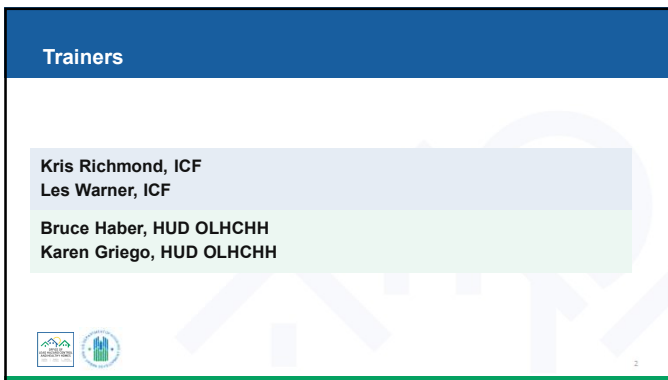
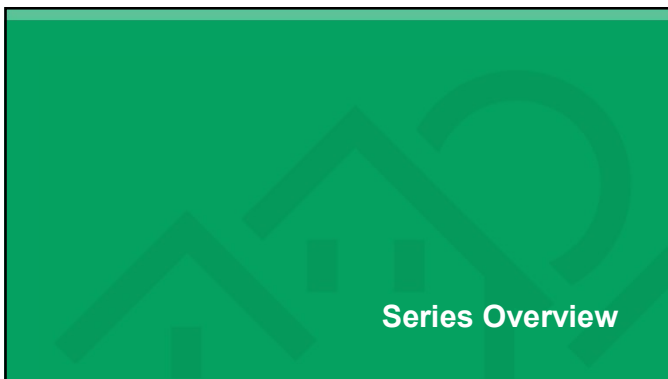




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Goals for this Training Series


- Understand the significance of an elevated blood lead level (EBLL)
- Gain a deeper understanding of the Federal Lead-Based Paint Regulations
- Determine the types of HUD assistance and/or HUD programs that trigger the requirements of Subparts J or K
- Review the key documentation requirements (i.e. testing, hazard control, notification)
- Introduce key terms
- Provide a tour of the available resources



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Webinar Series Format

- Four weekly sessions
 - Up to 2 hours
 - 1-hour Office Hours will occur on the day after the webinar to review homework and answer questions
- Session 1 is mandatory, then choice of remaining sessions
 - Participants administering operating programs/projects including rehabilitation should attend Sessions 1-3
 - Those administering programs without rehab but including leasing, operations, or homebuyer should attend Session 1 and Session 4
 - See the Agenda and Subpart J and K to determine what sessions you need
- Some participants may want to attend all four sessions
- Links of recordings will be available



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Webinar Series Agenda

Session 1

→

Session 2

→

Session 3

→

Session 4

Session 1

- LSHR Basics
- Regulatory Subparts per Assistance Type

Session 2

- Subpart J: Rehab Requirements for Planning

Session 3

- Subpart J: Rehab Requirements for Construction and Clearance

Session 4

- Subpart K: Acquisition, Leasing, Support Services and Operation Programs




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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



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What types of programs are you operating?

A. Rehabilitation (homeowner or rental)

B. Homebuyer/Acquisition

C. Leasing and Support services


D. Two or more types of programs



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Which Sessions Should I Attend?

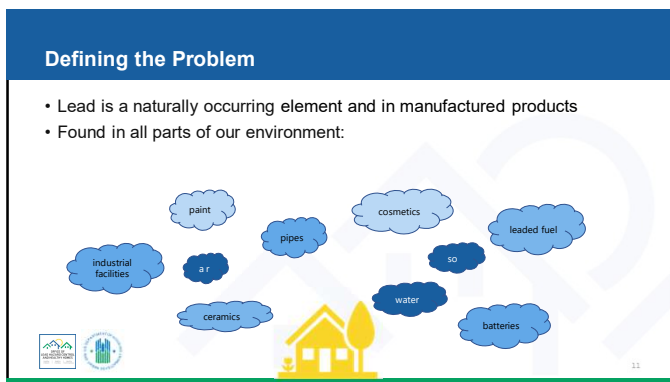
- All participants should attend or watch Session 1.
- Attend Sessions 2-4 depending on needs/activities undertaken within their programs
 - If completing rehabilitation work, attend Sessions 2 and 3
 - If completing acquisition, homebuyer assistance, leasing, support services, and operations, attend Session 4
 - If completing projects including acquisition and rehabilitation work over \$5,000/unit, attend all Sessions



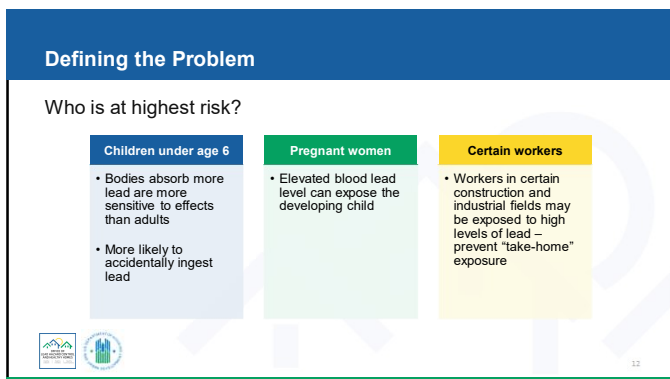
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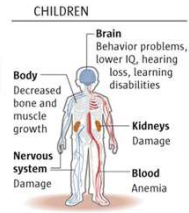
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Children and Exposure to Lead

- 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?
 - 5 µg/dL



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Lead Safe Housing Rule (LSHR)



PURPOSE:

To protect children in assisted target housing through primary prevention

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).*



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Lead Regulations Apply **Except** When:

- Property constructed **after January 1, 1978**
- Zero-bedroom units** and SROs (in the works to be removed)
- Housing designated exclusively for the **elderly** or persons with **disabilities** **unless** if a child less than 6 resides or expected to reside there
- Properties found to be **lead-free** by a LBP inspection or where all LBP has been identified, **removed**, and clearance achieved



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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)
 - This exemption DOES NOT APPLY to restoration/rehabilitation of such damaged property
- Subpart K does not apply if the assistance being provided is emergency rental assistance or foreclosure prevention assistance that is 100 days or less. This exemption expires 100 days after the initial payment or assistance.



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Limited Exemption from Lead Safe Work Practices and Clearance

- Rehab that **does 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:
 - 2 sq. ft. per interior space
 - 10% of small component type
 - 20 sq. ft. for exterior work

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



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Federal Lead Regulations

- | | |
|--------------------------------------|--|
| HUD –
24 CFR
Part 35 | <ul style="list-style-type: none"> • 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 | <ul style="list-style-type: none"> • 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: Recent changes in the EPA rule went into effect on January 6, 2020 and additional proposed rule changes were released on 6/17/2020



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HUD Regulation Subparts

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

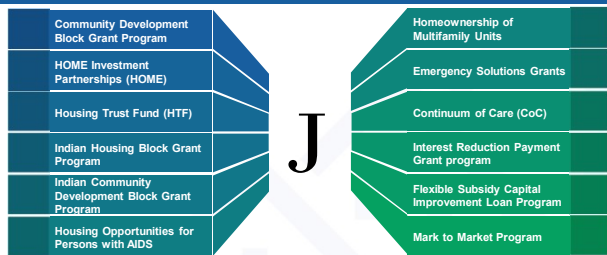
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HUD Regulation Subparts by Programs

Subparts	Assistance Type	Programs
J	Rehabilitation	All
K	Acquisition, Leasing, Support Services, or Operation	CPD, PIH
L	Public Housing Programs	PIH
M	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	

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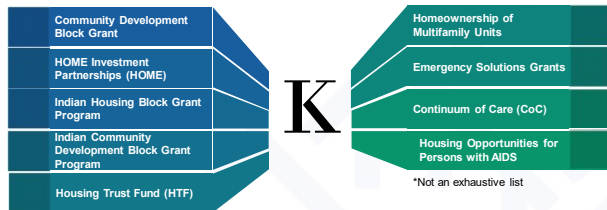
Subpart J Examples of Rehabilitation Programs



*Not an exhaustive list

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Subpart K Examples of Acquisition, Leasing, Support Services, and Operations Programs



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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
- Amendments (EBLL) effective 2/13/17

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

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



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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
 - 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/cm²


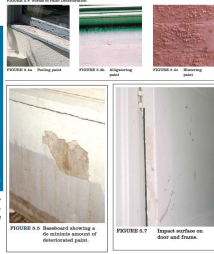


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Guidance and Performance Criteria

- HUD Guidelines for the Evaluation and Control of Lead-Based Paint Hazards in Housing
- Detailed instructions and standards for how to evaluate and reduce hazards
- Cited by EPA in its lead rules as a "documented methodology."
- 2012 most recent version:
https://www.hud.gov/program_offices/healthy_homes/lbp/hudguidelines


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Resources

- OLHCHH homepage: www.hud.gov/lead
- Lead Regulations Landing Page: http://portal.hud.gov/hudportal/HUD?src=/program_offices/healthy_homes/enforcement/regulations
- Lead-Based Paint: <https://www.hudexchange.info/programs/lead-based-paint/>
- Lead Safe Housing Rule (LSHR) Training: <https://www.hudexchange.info/trainings/lead-based-paint/lshr>
- Lead Compliance Advisor: <https://portalapps.hud.gov/CORVID/HUDLBPAdvisor/welcome.html>
- Guidelines for the Evaluation and Control of Lead-Based Paint Hazards in Housing 2012 Edition https://www.hud.gov/program_offices/healthy_homes/lbp/hudguidelines
- HUD Exchange CDBG-DR page: <https://www.hudexchange.info/programs/cdbg-dr/>
- HUD Exchange CDBG-MIT page: <https://www.hudexchange.info/programs/cdbg-mit/>
- Health Effects of Lead – Gross Science Video: <https://www.youtube.com/watch?v=76RKSQgduVQ>

Contact OLHCHH: leadregulations@hud.gov



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Schedule for Upcoming Webinar Sessions

- ✓ **Completed: Session 1:** Rehabilitation, Acquisition, Leasing, Support Services, and Operations
- ➔ **Next: Session 2** Subpart J: Rehab Planning Phase
- **Session 3** Subpart J: Rehab Construction Phase
- **Session 4** Subpart K: Acquisition, Leasing, Support Services and Operation Programs



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Which Sessions Should I Attend?

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Q&A

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