

## Lead-Based Paint Report Highlights Video Transcript

There are three primary investigative processes for lead hazard identification.

A LBP inspection is used to determine and report whether lead-based paint is present.

A risk assessment is used to determine and report the existence, nature, severity and location of LBP hazards at a single point in time.

A clearance examination is used to determine and report whether or not an activity disturbing lead-based paint (lead abatement, renovation, repair and/or painting) has been successfully completed and the space impacted is clean enough to safely re-occupy.

Each of these investigations is done within a regulatory framework with different reporting requirements. The professional responsibilities of an inspector include writing reports that are well-written, understandable, and meet HUD and EPA requirements.

Reports covering investigative processes can vary between different providers. However, there is key information that should be included in all reports.

The first key reportable result is where the investigation took place. This includes the address of the building, date of construction, unit numbers, and rooms/areas included.

The second key reportable result is when the investigation took place. Both date(s) and time(s) should be reported.

The third key reportable result is who performed the investigation and who conducted laboratory analysis (if any). This includes identity, location, certification credentials, certification number, and contact information of the firm doing the investigation, of the person(s) conducting activities, and of the lab(s) (if used).

Each report should be enough detail for the reader to understand what was collected, where and when it was collected, and what result was found. Documenting these details in an organized manner is key to writing a successful report.

All the reports will include information on the X-Ray Fluorescence, or XRF, testing. The model and serial number of the XRF device should be provided.

The report may include a list of all XRF tests taken on a testing data sheet including information on the component, substrate, lead reading, and whether it is a negative or positive result.

The first report we'll review in detail is the lead-based paint inspection report.

A lead-based paint inspection report is completed by the certified lead or risk assessor inspector and answers 2 main questions:

Is there lead-based paint in the house?

If lead-based paint is present, where is it located?

The report should include the following sections:

An executive summary – to summarize the report, unit, method, and findings

XRF Sampling Summary – to describe the XRF machine used, the classification of the standard, and a list of results. The report also includes information about the methods used for testing and the results from testing. Findings contain all collected test data. It is generally provided as listing of data accompanied by an introduction, footnotes, floor plans and/or supplemental pages to explain the information presented.

Disclosure of lead-based paint – to indicate that the information must be disclosed to tenants and prospective purchaser. Recommendations for next steps in addressing lead-based paint may be included.

It may also include attachments to provide any further detail on the investigation.

The next report is for the risk assessment. A risk assessment report is compiled by the risk assessor who documents the findings and identifies control measures.

The report includes site-specific lead hazard control options and their cost and feasibility as well as recommendations to the owner for revaluation and actions for when no hazards are identified.

Risk Assessment will also be provided to the grantee for HUD funded projects

Similar to the LBP inspection report, the risk assessment report should include: an executive summary, summary of testing findings, disclosure of lead language, and attachments to provide further detail.

The report should state whether any lead hazards were found at the dwelling. Testing results should be clearly labeled in the report.

For example, in summarizing the list of positive XRF readings, list the unit number, room, component tested, and paint condition.

For dust results, list the date collected, unit number and test location, the sample number, and if the sample is above or below the listed dust level standard.

After the nature, severity, and location of identified lead hazards are described, the report should inform the owner/grantee of the range of acceptable hazard control measures. The report should describe the cost and feasibility of site-specific lead hazard control options.

Each owner will have a different level of available funding. The risk assessor should provide information that will assist the owner in making an informed decision.

Costs for various treatments vary considerably from one locale to the next and are subject to market conditions, making it difficult to provide cost estimates.

However, the risk assessor should at least indicate the order in which acceptable hazard control options for a given hazard fall in terms of relative initial cost.

In addition to cost, the risk assessor should identify treatments that are unlikely to be effective. The risk assessor must also emphasize the danger of using prohibited methods of lead hazard control, such as uncontained abrasive, sand, or water blasting; power-sanding; or open-flame burning of painted surfaces.

The report also provides a re-evaluation recommendation for at least as often as every two years for HUD-assisted properties when required.

A chart describing the re-evaluation schedule and activities may be helpful

If no lead hazards are identified, but no lead-based paint inspection has been completed, the risk assessment report should recommend to the owner that painted surfaces that the risk assessment found to be lead-based paint, and any untested painted surfaces, be treated as though they contain lead.

The report can include attachments with details on the unit and testing elements such as a floor plan, images, and reports from the laboratory.

These findings are used for HUD grantees to complete a Notice Of Evaluation that is provided to the owner or tenant within 15 days of receiving the report.

The final report is the clearance report.

The clearance examiner provides the client with the results of the clearance exam. The report should clearly state if the unit passes or fails clearance.

The report should include a summary at the beginning of the report that is suitable for communication with residents as well as a complete file of the visual assessment(s) form(s) and the dust sampling results form(s).

For the clearance findings, a summary shall include results of the visual assessment if any dust or lead hazards can still be seen. The clearance examination should be stopped if the visual assessment fails. Failing visual clearance requires re-cleaning. If recleaning is required, a 1 hour wait period is required before the clearance exam can be conducted.

A summary of the results of the dust testing, which should include either:

A statement that no dust-lead hazards, were found in the clearance area, and the date of the dust sampling; or a statement that dust-lead hazards were found in the initial examination, identifying the date of the initial examination, the rooms and surfaces where dust-lead hazards were found, including any unsampled rooms and surfaces represented by the samples, and stating the dust-lead levels found.

If dust-lead hazards were found in a second or later round of dust sampling, a similar summary of the results of the dust testing should be provided for each round separately

The report can include attachments with details on the unit and testing elements such as a floor plan, images, and reports from the laboratory.

The findings in the clearance report are used for HUD grantees to complete a Notice of Lead Hazard Reduction Activities which states what was done to address the lead hazards and that the unit passed clearance. The Notice is provided to the owner or tenant within 15 days of receiving the report.

The property owner, grantee, contractor, and clearance examiner should maintain records of all reports.

The records should include all laboratory results, quality control/quality assurance procedures, dates of both visual examination and environmental sampling, completed forms, and appropriate identifiers for the property

Lead reports should be kept on file by grantees according to the program retention requirements.

Property owners must keep all records for disclosure purposes, until the sale of the property, at which time the info is transferred to the new owner. Signed disclosure documents must be kept by sellers and agents no less than 3 years from the date of sale or the commencement of the leasing period.

This video provided an overview of key information across the lead-based paint reports.

Other videos on how to conduct these inspections and assessments are also available.

For specific information on each report, view the Guidelines for the Evaluation and Control of Lead-Based Paint Hazards in Housing available on HUD.gov.