Student Materials

Table of Contents

Each module listed below includes:

Module Overview
Copies of Overhead Slides
Exercise Worksheets

Module 1:  Introduction
Module 2:  Lead Safe Housing Rule
Module 3:  Rehabilitation Planning
Module 4:  Rehabilitation – Construction Phase
Module 5:  Refining Your Rehabilitation Program
Module 6:  Homebuyer Programs
Module 7:  TBRA Programs
Module 8:  Special Needs Housing Programs
Module 9:  Planning for Compliance
Lead Based Paint Implementation Training

Module 1
Introduction

Lead Based Paint Implementation Course

- Developed for HUD Office of Affordable Housing Programs
  - With active involvement of HUD Office of Healthy Homes and Lead Hazard Control
  - By ICF International
- Builds on “Learning the Rules” regulatory course
- Who are we?
  - Program trainer
  - Technical trainer

Course Objectives

- Reinforce knowledge of Lead Safe Housing Rule
- Answer common questions
- Identify key compliance challenges
- Share ideas and strategies
- Provide tools and forms to make the process easier
Making it Work: Implementing the Lead Safe Housing Rule
Module 1: Introduction

U.S. Department of Housing and Urban Development
February 2007

Course Structure

• Three parts:
  - Introduction, Rehab, Other Activities
• Lots of exercises
• Course Manual
  - Part 1: Student Materials
    ✅ Exercises
    ✅ Copies of overheads
  - Part 2: Resources (Rule and Forms)
  - Part 3: Reference Manual Chapters 1-7

Logistics

• Timing of breaks and lunch
• Telephones
• Restrooms
• Hey, where’s the coffee??

Rules!!!!

• Ask questions
• Share techniques
• Sticky questions board
• Parking lot
• Training amnesty
• No cell phones that ring, please
Who’s here?

- State Agencies
- Entitlement Cities
- Urban Counties
- Small Cities
- Public Housing Authorities
- Others?

Exercise 1-1: Getting to Know You...

- Introduce yourself to your table
- Read questions on Exercise 1-1
- Share your answers with the table
- Write down answers of others at your table
- You have ten minutes

Exercise 1-2: Lead Based Paint Hazards

- Answer questions with your group
- Answers are very short
- Be prepared to report out your answers
- You have five minutes

Use information in Reference Manual Chapter 2 to answer questions!
Exercise 1-2: Lead Based Paint Hazards

- Who is most at risk?
- How do people get poisoned?
- How do you know if someone has been poisoned?
- What are the effects of poisoning in adults?
- What are the effects of poisoning on children?
- What is a lead-based paint hazard?
- In what types of homes are hazards found?
- How are hazards addressed?

Wrap-Up

- What’s next
  - Lead Requirements
  - Rehabilitation and other programs
- Any questions?
Exercise 1-1: Getting to Know You

Answer questions 1-7 for you and others at your table

<table>
<thead>
<tr>
<th>For this program year, across all your housing programs:</th>
<th>Answers of People at your Table</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. How many assisted units are affected by the Lead Safe Housing Rule?</td>
<td>You</td>
</tr>
<tr>
<td>2. How many risk assessments have been done?</td>
<td></td>
</tr>
<tr>
<td>3. How many interim control jobs? (This counts paint stabilization done under TBRA or homebuyer programs)</td>
<td></td>
</tr>
<tr>
<td>4. How many lead-based paint abatement jobs?</td>
<td></td>
</tr>
<tr>
<td>5. How many lead-based paint trainings have you attended?</td>
<td></td>
</tr>
<tr>
<td>6. What percent of your staff have been trained in some way on lead-based paint?</td>
<td></td>
</tr>
<tr>
<td>7. How many of your contractors have been trained in some way on lead-based paint?</td>
<td></td>
</tr>
</tbody>
</table>

Record your answer to the following question on a yellow sticky:

8. What do you hope to learn in the next two days?
Exercise 1-2: Lead Based Paint Hazards

Directions:

Use information in Chapter 2 of the Reference Manual to answer these questions.

1. Who is most at risk of lead poisoning?

2. How do people get poisoned?

3. How do you know if someone has been poisoned?

4. What are the effects of lead poisoning in adults?

5. What are the effects of lead poisoning on children?

6. What is a lead-based paint hazard?

7. In what types of homes are hazards found?

8. How are hazards addressed?
# Module 2: Lead-Safe Housing Rule

**Module Objectives:**
Students will be able to:
- Explain the framework of the Lead-Safe Housing Rule
- Explain Lead Hazard Evaluation and Reduction Methods
- Explain exemptions to the Lead Safe Housing Rule
- Describe how to research State requirements

**Module Overview:**

<table>
<thead>
<tr>
<th>Topics covered</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Review of requirements</strong></td>
</tr>
<tr>
<td>- Purpose of the rule</td>
</tr>
<tr>
<td>- Activities and programs affected</td>
</tr>
<tr>
<td>- Enforcement, and</td>
</tr>
<tr>
<td>- Summary of the rule.</td>
</tr>
<tr>
<td>- Key resource: Attachment 3-A at the back of Chapter 3 in the Reference Section.</td>
</tr>
<tr>
<td><strong>Notification</strong></td>
</tr>
<tr>
<td>Requirements on notification</td>
</tr>
<tr>
<td><strong>Exercise 2-1: Test Your Knowledge - Lead Hazard Evaluation</strong></td>
</tr>
<tr>
<td>Describe the four methods of lead hazard evaluation/assessment discussed in this course, by matching colored cards to descriptions of each method.</td>
</tr>
<tr>
<td>- Each table will receive one laminated chart and a set of cards containing 4 different colors.</td>
</tr>
<tr>
<td>- Participants should work in small groups to place cards on a chart.</td>
</tr>
<tr>
<td>- Small groups share answers with larger group.</td>
</tr>
<tr>
<td><strong>Exercise 2-2: Test Your Knowledge – Lead Hazard Reduction</strong></td>
</tr>
<tr>
<td>This is a card exercise like the one in Exercise 2-1. The cards in this exercise describe lead hazard reduction activities.</td>
</tr>
<tr>
<td>- Each table should receive one laminated chart and a set of cards containing 6 different colors.</td>
</tr>
<tr>
<td>- Participants should work in small groups to place cards on the chart.</td>
</tr>
<tr>
<td>- Small groups share answers with larger group.</td>
</tr>
<tr>
<td><strong>Ongoing Maintenance</strong></td>
</tr>
<tr>
<td>Ongoing maintenance requirements</td>
</tr>
<tr>
<td><strong>Exercise 2-3: Does the Lead-Safe Housing Rule Apply?</strong></td>
</tr>
<tr>
<td>Participants work individually to identify whether a described situation is exempt or not, whether it is a special circumstance or not, and if yes, why.</td>
</tr>
<tr>
<td>- Participants work individually</td>
</tr>
<tr>
<td>- Share answers in large group</td>
</tr>
<tr>
<td><strong>State Requirements</strong></td>
</tr>
<tr>
<td>- Review state regulatory investigative tool.</td>
</tr>
<tr>
<td>- Key resource: Attachment 3-H at the back of Chapter 3 in the Reference Section.</td>
</tr>
</tbody>
</table>
## Module 2: Lead Safe Housing Rule
### List of Useful Resources

<table>
<thead>
<tr>
<th>Resource</th>
<th>Where to Find It</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. 24 CFR Part 35</td>
<td>Appendix A</td>
</tr>
<tr>
<td>2. Interpretive Guidance</td>
<td>Appendix A</td>
</tr>
<tr>
<td>3. Lead Hazard Information Pamphlet</td>
<td>Form 1</td>
</tr>
<tr>
<td>4. Disclosure Forms</td>
<td>Forms 2 and 3</td>
</tr>
<tr>
<td>5. Lead Hazard Evaluation Notice</td>
<td>Form 10</td>
</tr>
<tr>
<td>6. Lead Hazard Presumption Notice</td>
<td>Form 11</td>
</tr>
<tr>
<td>7. Lead Hazard Reduction Notice</td>
<td>Form 23</td>
</tr>
<tr>
<td>8. Lead Safe Housing Requirements Screening Worksheet and Rehab Addendum</td>
<td>Forms 5 and 6</td>
</tr>
<tr>
<td>12. Chapter 3: Lead-Based Paint Requirements</td>
<td>Reference Manual Chapter 3</td>
</tr>
</tbody>
</table>
Module 2

Lead-Safe Housing Rule
A Review

Objectives
You will be able to explain:
• The framework of the Lead-Safe Housing Rule
• Lead Hazard Evaluation and Reduction Methods
• Exemptions to the Lead Safe Housing Rule
• How to research State requirements

Your Resources
• Part 2 (Resources) -- Appendix A
  - Lead Safe Housing Rule
  - Interpretive Guidance
• Part 3 (Reference Manual) -- Chapter 3
  - Attachment 3-A (regulation summary)
  - Attachment 3-H (state reg investigative tool)
Purpose of the Rule

- To protect young children
- To control lead-based paint hazards in paint, dust, and soil
- **Not:** To abate intact lead-based paint

Activities Affected

- Rehabilitation
- Tenant-Based Rental Assistance
- Acquisition, Leasing, Support Services, and Operations

CPD Programs Affected

- HOME Investment Partnerships Program (HOME)
- Community Development Block Grant (CDBG)
- Emergency Shelter Grants (ESG)
- Housing Opportunities for Persons with AIDS (HOPWA)
- Shelter Plus Care (S+C)
- Supportive Housing Program (SHP)
- Youthbuild
Enforcement

- Failure to comply may lead to sanctions under the program providing assistance
- State and local law may render other penalties

Summary of Requirements
Four Approaches

1. Do no harm
2. Identify and stabilize deteriorated paint
3. Identify and control lead hazards
4. Identify and abate lead hazards

Summary of Requirements
Five Activities

- Notification
- Lead hazard evaluation
- Lead hazard reduction
- Ongoing maintenance
- EIBLL requirements
Notification Requirements

- Prior to leasing a unit:
  - Lead Hazard Information Pamphlet
  - Disclosure Form
- After lead hazard evaluation
  - Notice of Lead Hazard Evaluation
- After presuming lead-based paint and its hazards
  - Notice of Lead Hazard Presumption
- After conducting lead hazard reduction activities
  - Notice of Lead Hazard Reduction

Reference Manual
Chapter 3, Exhibit 3-6

Lead Hazard Evaluation

- Visual Assessment
- Paint Testing
- Paint Inspection
- Risk Assessment
  - Lead Hazard Screen

Exercise 2-1: Test Your Knowledge—Lead Hazard Evaluation

1. Prepare the game
   - Place gameboard on table
   - Pass out all the cards
2. Play the game
   - Place the cards in the correct spot on the gameboard
   - You have 5 minutes
Exercise 2-1: Questions

- When is this method required?
- What does it identify?
- Who can do it?
- Is a notice required?

See Reference Manual Chapter 3, Exhibit 3-7 and the Lead Safe Housing Rule (Appendix A)

Lead Hazard Assessment/ Evaluation: Resources

- Lead-Safe Housing Rule: 24 CFR 35.1320
- Interpretive Guidance: Subparts B and R
- Reference Section: Exhibit 3-7 on evaluation methods
- Visual Assessment Training: www.hud.gov/offices/lead/lbptraining.cfm

Lead Hazard Reduction

- Paint stabilization
- Interim controls
- Standard treatments
- Abatement
Exercise 2-2: Test Your Knowledge—Lead Hazard Reduction

1. Prepare the game
   - Place gameboard on table
   - Pass out all the cards
2. Play the game
   - Place the cards in the correct spot on the gameboard
   - You have 5 minutes

Exercise 2-2: Questions

- When is this method required?
- What does it achieve?
- Who can do it?
- Is a notice required?
- Are safe work practices required?
- Is clearance required?

See Reference Manual Chapter 3, Exhibit 3-8 and the Lead Safe Housing Rule (Appendix A)

Lead Hazard Reduction: Resources

- Lead-Safe Housing Rule: 24 CFR 35.1330 and 35.1325
- Interpretive Guidance: Subparts B and R
- Reference Manual Chapter 3, Exhibit 3-8 (page 3-18)
Quick Quiz

Lead Hazard Reduction

• What is the difference between paint stabilization and paint repair?
• What are the four methods of abatement?
• When are safe work practices and clearance not required?
• Who conducts clearance?

Ongoing Maintenance

• Applies when relationship is ongoing
• Requires annual visual assessment
• Identified hazards must be fixed safely
• Ask tenants to notify owners of deteriorated paint
• Clearance is required
• Note: Reevaluation is required for interim controls

Exercise 2-3: Does the Lead-Safe Housing Rule Apply?

• Work individually
• Answer the questions
  - Is the unit exempt?
  - Does it qualify for a limited exception?
  - Why?
• You have 10 minutes

See Appendix A – 24 CFR 35.115(a)
Exemptions: Resources

- Exemptions from the Lead-Safe Housing Rule: 24 CFR 35.115, 35.165
- Limited exceptions from specific requirements:
  - De minimus (35.1350; Interpretive Guidance J7, J8, R17)
  - Elderly occupied unit (J24)
  - Unit listed on National Register of Historic Places (35.115)

Researching Your State Regulations

- Get started: laws, people, other sources of information
- Answer 10 questions about your State’s
  - Definitions
  - Evaluation/reduction requirements
  - Certification requirements
  - Other requirements
- Analyze the answers to see how it affects you

Wrap Up

- Covered the Lead Safe Housing Rule
  - Notices
  - Lead Hazard Evaluation
  - Lead Hazard Reduction
  - Ongoing Maintenance
  - EIBLL
  - Exemptions
- Next -- Apply it to rehab!
Exercise 2-1: Test Your Knowledge – Lead Hazard Evaluation

Use the blank chart and the colored cards provided to you. Place each card in its appropriate square.

- Visual Assessment
- Paint Testing
- Lead-Based Paint Inspection
- Risk Assessment
Exercise 2-2: Test Your Knowledge – Lead Hazard Reduction Methods

Use the blank chart and the colored cards provided to you. Place each card in its appropriate square.

Paint Stabilization

Interim Controls

Abatement

Standard Treatments
Exercise 2-3: Does the Lead-Safe Housing Rule Apply?

There are several circumstances when a property or a unit is exempt either from the Lead-Safe Housing Rule in its entirety or from portions of the Lead-Safe Housing Rule. Please determine if the following circumstances reflect exemptions under the Lead-Safe Housing Rule.

<table>
<thead>
<tr>
<th>Sample Question:</th>
<th>Exempt?</th>
<th>Limited Exception?</th>
<th>Explain</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Homeowner rehab project, 65 year-old woman lives in the unit.</strong></td>
<td>No</td>
<td>Yes</td>
<td>Eligible for relocation waiver [HUD interpretive guidance, Question J-24]</td>
</tr>
<tr>
<td>1. A previous lead-based paint inspection in the Smith’s house shows it has no lead-based paint.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>2. Unit is vacant and will remain vacant until demolished.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>3. Property is being used for a day care center.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>4. Tornado ripped a hole in the roof of the house.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>5. Furnace is broken in the middle of winter.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>6. Porch steps are broken. Someone could trip and break a leg.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>7. Job involves replacement of water heater and some roof repair. [no paint to be disturbed]</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>8. Emergency rental assistance is provided to a family for three months to prevent their eviction.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>9. Transitional housing allows for residents to stay up to 90 days. The unit is then opened to another resident.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>10. Work will involve only 18 ft² on the exterior of the home.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>11. Unit is listed on the National Register of Historic Places.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>12. Rental unit occupied by elderly person.</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
Module 3: Rehabilitation Planning

Module Objectives:
Students will be able to:
➢ Describe Lead Safe Housing Rules for rehabilitation projects
➢ Calculate the level of assistance to a project
➢ Describe changes to application forms and procedures
➢ Describe options for evaluation
➢ Describe how risk assessment results affect project planning
➢ List ways to keep residents informed about the process

Module Overview: The module is summarized below.

| Introduction       | • Review of Requirements
|                   | • Calculating the Level of Assistance
| Exercise 3-1       | Participants examine the work write-up for the Jones’ home and work in small groups to answer questions.
| Initial Work Write-Up and Cost Estimate | Exercise 3-2
| Hiring a Risk Assessor | Participants examine a sample RFP for Risk Assessor and answer questions as a large group about the content.
| Exercise 3-3       | Participants examine the RA Report for the Jones’ home and work in small groups to answer questions.
| Reading the Risk Assessment Report | Exercise 3-4
| Revising the Work Write-Up | Participants review a completed work write-up and discuss.
| Exercise 3-5       | Participants examine a completed Lead Requirements Screening Worksheet – Rehab Addendum and discuss how the figures were calculated to determine the applicable lead hazard reduction requirements.
| Documenting Project Costs | Exercise 3-6
| Contractor Qualifications | Small groups work on exercise related to contractor qualifications.
| Wrap up            | • Informing the occupant
|                   | • Documentation
|                   | • Good resources
# Module 3: Rehabilitation Planning
## List of Useful Resources

<table>
<thead>
<tr>
<th>Resource</th>
<th>Where to Find It</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Rehabilitation Project Flowchart</td>
<td>Form 4</td>
</tr>
<tr>
<td>2. Calculating Level of Rehabilitation Assistance Worksheets</td>
<td>Form 7</td>
</tr>
<tr>
<td>3. Sample Homeowner’s Manual</td>
<td>Form 8</td>
</tr>
<tr>
<td>4. Lead Safe Housing Requirements Screening Worksheet</td>
<td>Form 5</td>
</tr>
<tr>
<td>5. Lead Safe Housing Requirements Screening Worksheet -- Rehab Addendum</td>
<td>Form 6</td>
</tr>
<tr>
<td>6. Sample Lead Hazard Reduction Specifications</td>
<td>See <a href="http://www.centerforhealthyhousing.org">www.centerforhealthyhousing.org</a> and National Institute for Building Sciences</td>
</tr>
<tr>
<td>7. Risk Assessment Review Checklist</td>
<td>Form 53</td>
</tr>
<tr>
<td>8. Lead Hazard Evaluation Notice</td>
<td>Form 10</td>
</tr>
<tr>
<td>11. Property Owner’s Service Agreement</td>
<td>Form 9</td>
</tr>
<tr>
<td>12. Lead Hazard Presumption Notice</td>
<td>Form 11</td>
</tr>
<tr>
<td>13. Sample Risk Assessment Report – Multifamily</td>
<td>Form 12</td>
</tr>
<tr>
<td>14. Elderly Waiver for Relocation</td>
<td>Form 13</td>
</tr>
<tr>
<td>15. Chapter 4: Addressing Lead-Based Paint in Rehabilitation Programs</td>
<td>Reference Manual Chapter 4</td>
</tr>
</tbody>
</table>
Rehab Planning

Objectives

At the end of this module, students will be able to:
• Describe Lead Safe Housing Rules for rehabilitation projects
• Calculate the level of assistance to a project
• Describe options for evaluation
• Read a risk assessment report
• Describe how risk assessment results affect project planning

Lead Requirements for Rehab: An Overview

• 3 approaches, related to thresholds
  - ≤ $5000, $5000 - $25,000, Over $25,000
• Each involves
  - Notification
  - Evaluation
  - Reduction
  - Ongoing Maintenance (HOME rental only)

See Form 4: Rehab Flowchart
Calculating the Level of Assistance

• Level of Assistance determined by dual threshold
  Lesser of:
  – Federal Assistance or
  – Rehab Hard Costs
    ✓ no soft costs
    ✓ no lead hazard reduction costs
• See Calculation Worksheets (Form 7)

Calculating the Level of Assistance

Example 1

• A single family home is rehabilitated for $6,000 (hard costs).
• The owner is receiving a $2,000 low interest loan from the city’s HOME Program.
• The level of assistance is __________

Calculating the Level of Assistance

Example 2

A family is purchasing a home and receiving $10,000 in assistance for downpayment, closing costs, and rehab costs.
• The hard costs of rehabilitation are $6,000.
• The level of assistance is __________.
Calculating the Level of Assistance
Multifamily Units

\[ \frac{A}{NU} + \frac{B}{TU} \]

- \( A \): Rehab hard costs for assisted units
- \( B \): Rehab hard costs for common areas
- \( NU \): Number of assisted units in project
- \( TU \): Total Units in project

Calculating the Level of Assistance
Example 3: Multifamily

A 20-unit property is doing $100,000 in rehabilitation
- The rehab will include $40,000 in hard costs for repairs to exterior and common areas
- And $60,000 in hard costs for 10 HOME-assisted units
- The per unit hard costs are __________

Rehabilitation Planning Exercise
Overview

- Writing a work write-up
- Obtaining a risk assessment
- Revising the work write-up
- Communicating with the homeowner
Exercise 3-1: Initial Work Write-Up and Cost Estimate

The Jones family has applied to the Town of Coolsville's Homeowner Rehabilitation Program. Bruce Smith, the Rehabilitation Specialist, visits the Jones' home and develops a work write-up for the job. Review his work write-up and answer the questions below. The work write-up for the Jones' home is provided as Exhibit A to this module.

Questions:

1. What is the initial cost estimate?

2. What lead hazard evaluation is required? Why?

3. Which surfaces require paint testing?

4. Suppose the City of Coolsville has adopted a strategy of presuming lead hazards instead of doing risk assessments. What specific measures will be required on the building components we know about? What other measures will be needed? Why?

Work in small groups to answer the questions above. Write your answers in the space provided. You have 5 minutes.
Exercise 3-2: Hiring a Risk Assessor

In fact, Coolsville does risk assessments on all jobs over $5,000. Upon completion of the work write-up, Bruce sends out a Request for Proposals (RFP) to the Risk Assessors on their building list. Review the RFP provided as Exhibit B to this module.

Questions: Answer the questions below and indicate where you found the information.

1. What type of information is provided about the property in the RFP?

2. What does the RFP say about where the Risk Assessor must test for lead-based paint?

3. What types of hazards must be identified?

4. What must be included in the risk assessment report?

5. What information must be provided on Hazard Control Options?

6. Is there anything that surprises you about this RFP?

Work in small groups to answer the questions above. Write your answers in the space provided. You have 10 minutes.
Exercise 3-3: Reading the Risk Assessment Report

The Risk Assessor conducts a risk assessment of the Jones’ home. The resulting risk assessment report is attached. Review the Jones’ risk assessment report and answer the questions below. The risk assessment report is provided as Exhibit C to this module.

Questions:

Helpful hint: Read the questions first. Then look in the report for the answers.

1. What lead hazards are in the Jones’ unit? Where did you find this information?

2. Notice that the Risk Assessment has both interim controls as well as abatement options. Why did the Risk Assessor provide both options?

3. Which options – interim controls or abatement -- does Bruce Smith need to follow? Why?

4. Based on these risk assessment results, what items would you change or add to the work write-up?

5. Do you have any questions about this Risk Assessment Report?

Work in small groups to answer the questions above. Write your answers in the space provided. You have 10 minutes.
Exercise 3-4: Updating the Work Write-Up

Based on the risk assessment results, Bruce revised his work write-up for the Jones’ home. See Exhibit D at the end of this module.

1. Are all the hazards identified in the risk assessment addressed by these new specs? How?

2. What are the total costs of the lead hazard reduction work? How did you calculate them?

3. What lead hazard reduction methods did Bruce choose when developing these specs?

4. Would you do anything differently?

5. Is there anything that surprises you about this work-write-up?

Work in small groups to answer the questions above. Write your answers in the space provided. You have 10 minutes.
Exercise 3-5: Documenting Project Costs

Bruce completed his Lead Safe Housing Requirements Screening Sheet and confirms that the level of assistance for this project is still in $5000 - $25,000 category. See the completed form below. In completing it, he takes into account:

- The HOME funds received by the project of $15,000. The project received no other assistance.
- His hard costs of rehab.

Questions:
1. How did Bruce calculate the Federal Assistance?
2. How did he calculate the hard costs of rehab?

LEAD HAZARD REQUIREMENTS SCREENING WORKSHEET
Addendum for Rehabilitation Projects (See Form 6 in this Manual)

Part 3: Per Unit Level of Rehabilitation Assistance

A. Average Federal Funding Per Unit
   $15,000

B. Average Per Unit Rehabilitation Hard Costs
   (not including costs of lead hazard evaluation and reduction)
   $10,092

C. Lower of A or B
   $10,092

Part 4: Approach Required (Based on answer to 3.C., above)

- $0 – $5,000
  _____ Do No Harm (Test & Repair)
- $5,001 - $25,000
  _____ Identify and Control Lead Hazards
- $25,001 and above
  _____ Identify and Abate Lead Hazards

Calculated by ______ Bruce Smith ________ 10/19/01 ______

I have evaluated the site, the specifications, estimated the rehab hard costs and interviewed the occupants. In my professional opinion, this project meets the above requirement for federal lead hazard reduction under 24 CFR Part 35.

Bruce Smith 10/19/01
Signature Date
Exercise 3-6: Contractor Qualifications

Now that he has finalized his work write-up, Bruce is almost ready to bid the work. He reviews the work write-up to confirm the types of contractors he will need.

1. Based on this final scope of work, what type of workers does the contractor need to have? Why?

2. Suppose Bruce had decided that as part of his lead hazard reduction measures, he would do window replacement instead of stabilizing them. Would it change the workers who are needed to do the work?

3. Now suppose Bruce had included window replacement in his initial work-write up as a weatherization measure. How does this change the scenario?

Resources: See the HUD/EPA Abatement Letter (Attachment 3-I in the reference section of this manuals) and Form 14, Guidance on the HUD/EPA Abatement Letter.

Work in small groups to answer the questions above. Write your answers in the space provided. You have 10 minutes.
Wrap Up: Informing the Homeowner

• What should you tell the homeowner?
• Some useful resources:
  – Lead Hazard Information Pamphlet (Form 1)
  – Homeowner Handbook (Form 8)
  – Homeowner Service Agreement (Form 9)
  – Notice of Lead Hazard Evaluation (Form 10)

Wrap Up: Documentation

• Lead Safe Housing Requirements Screening Sheet
  – Part 1 (Form 5)
  – Part 2 (Form 6)
• Risk Assessment Report
• Notice of Lead Hazard Evaluation
• Final Work Write-up

Wrap-Up Other Useful Resources

• See front of module for references to
  – Level of assistance calculation (Form 7)
  – Sample specifications
  – Guidance on HUD/EPA abatement letter (Form 14)
  – Risk assessment review checklist (Form 53)
• Next up -- Construction Phase
Exhibit A
Work Write-Up
This Work Write Up was developed for a fictional property. All specification language and costs are for discussion purposes only.

Work Item List Cover Sheet

Property Address: 123 Olympic Street

Owners: Susan and Bill Jones

Phone No: (111) 222-3333

Original Cost Estimate completed by: Bruce Smith     Date: October 4, 2001

Total Initial Estimate: $10,092.55

Modifications completed by: __________                             Date: ______________

Total Final Estimate: $______

Explanation for Modifications:

Date Bids Sent To Contractors:_____________________________

Bid Opening Date:_____________________________

Bids Returned by:_____________________________       Amount

1. __________________ ____________       _______________

2. ________________ ______________   _______________

3. ________________ ______________   _______________

Rehab Specialist:_____________________________

Witnessed by:_____________________________

Owner’s Acceptance: ________________________    Date:_______________________
WORK WRITE-UP FOR  
123 OLYMPIC STREET  
COOLSVILLE, ANY STATE  12345

PREPARED BY: Bruce Smith  
DATE: OCTOBER 4, 2001

SPECIFICATIONS BY LOCATION

<table>
<thead>
<tr>
<th>Spec Number</th>
<th>Spec Description</th>
<th>Quantity</th>
<th>Units</th>
<th>Price</th>
</tr>
</thead>
<tbody>
<tr>
<td>0031.1</td>
<td>CONSTRUCTION DEFINITIONS</td>
<td>1.00</td>
<td>GR</td>
<td>0.00</td>
</tr>
<tr>
<td></td>
<td>“Install” means to purchase, set up, test and warrant a new component. “Replace” means to remove and dispose of original material, purchase new material, deliver, install, test and warrant. “Repair” means to return a building component to like new condition through replacement, adjustment and recoating of parts. “Reinstall” means to remove, clean, store and install a component.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>0035.1</td>
<td>VERIFY QUANTITIES/MEASUREMENTS</td>
<td>1.00</td>
<td>GR</td>
<td>0.00</td>
</tr>
<tr>
<td></td>
<td>All measurements (i.e. SF of Drywall, or those provided with drawings) are for the contractor’s convenience prior to a mandatory site inspection to verify all dimensions. All quantities (i.e. number of window units) are as stated. No claim for additional funds due to discrepancies in measurements or quantities shall be honored if not submitted at the time of the initial proposal.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>0039.1</td>
<td>HVAC PERMIT REQUIRED</td>
<td>1.00</td>
<td>EA</td>
<td>0.00</td>
</tr>
<tr>
<td></td>
<td>Prior to the start of the heating/cooling work, the contractor shall create a heating distribution layout and perform heat/cooling loss calculations and all other documentation needed to apply for, pay for and receive an HVAC permit on behalf of the owner.</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
### NEW MATERIALS REQUIRED

<table>
<thead>
<tr>
<th>Code</th>
<th>Description</th>
<th>Quantity</th>
<th>Unit</th>
<th>Cost</th>
</tr>
</thead>
<tbody>
<tr>
<td>0077.1</td>
<td>All materials used in connection with this work write-up are to be new, of first quality and without defects – unless stated otherwise or pre-approved by Owner and Construction Specialist.</td>
<td>1.00</td>
<td>GR</td>
<td>0.00</td>
</tr>
</tbody>
</table>

### 1 YEAR GENERAL WARRANTY

<table>
<thead>
<tr>
<th>Code</th>
<th>Description</th>
<th>Quantity</th>
<th>Unit</th>
<th>Cost</th>
</tr>
</thead>
<tbody>
<tr>
<td>0090.1</td>
<td>Contractor shall remedy any defect due to faulty material or workmanship and pay for all damage to other work resulting therefrom, which appear within one year from final payment. Further, contractor shall furnish owner with all manufacturers’ and suppliers’ written warranties covering items furnished under this contract prior to the release of the final payment.</td>
<td>1.00</td>
<td>DU</td>
<td>0.00</td>
</tr>
</tbody>
</table>

### EXTERIOR

#### FRONT DOOR – PREHUNG METAL ENTRANCE

<table>
<thead>
<tr>
<th>Code</th>
<th>Description</th>
<th>Quantity</th>
<th>Unit</th>
<th>Cost</th>
</tr>
</thead>
<tbody>
<tr>
<td>3185.1</td>
<td>Dispose of door and frame. Install a prehung metal, insulated, 4-panel entrance door and jamb including interior and exterior casing, spring metal weatherstripping, interlocking threshold, wide angle peep sight, one entrance and one mortised deadbolt keyed alike. Prime and top coat.</td>
<td>1.00</td>
<td>EA</td>
<td>410.00</td>
</tr>
</tbody>
</table>

### ROOFING

#### TEAR OFF AND REROOF SHINGLES

<table>
<thead>
<tr>
<th>Code</th>
<th>Description</th>
<th>Quantity</th>
<th>Unit</th>
<th>Cost</th>
</tr>
</thead>
<tbody>
<tr>
<td>4580.1</td>
<td>Remove and dispose of all roofing &amp; defective sheathing. Cut a 1” wide vent at ridge board. Replace up to 5 sf of sheathing per 100 sf of roof using pine board or CDX plywood of matching thickness. Staple 15 lb felt. Install preformed aluminum, drip edge, and vent pipe boots. Install a 220 lb fiberglass asphalt, 3 tab shingle with a 25 year warranty. Replace all flashing. Install shingle-over ridge vent.</td>
<td>12</td>
<td>SQ</td>
<td>145.00</td>
</tr>
</tbody>
</table>

#### REPAIR FASCIA 1” X 6”

<table>
<thead>
<tr>
<th>Code</th>
<th>Description</th>
<th>Quantity</th>
<th>Unit</th>
<th>Cost</th>
</tr>
</thead>
<tbody>
<tr>
<td>4755.1</td>
<td>Install a 1” x 6”, #2 pine fascia with bevel cut joints using galvanized finish nails. Caulk over joints, and prime.</td>
<td>1</td>
<td>LF</td>
<td>4.60</td>
</tr>
</tbody>
</table>
### PORCH

<table>
<thead>
<tr>
<th>Item No.</th>
<th>Description</th>
<th>Quantity</th>
<th>Unit</th>
<th>Rate</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>5685.1</td>
<td>PREP &amp; PAINT PORCH</td>
<td>375</td>
<td>SF</td>
<td>0.69</td>
<td>258.75</td>
</tr>
<tr>
<td></td>
<td>Scrape all loose, peeling, cracked, blistered paint from porch, including floor, railing, ceiling, posts and trim. Feather edges and dull gloss by sanding. Rinse entire area with water. Let dry. Caulk all cracks. Spot prime and top coat with owner’s choice of premixed acrylic latex.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>3525.1</td>
<td>GUARD RAIL – WOOD</td>
<td>24</td>
<td>LF</td>
<td>15.00</td>
<td>360.00</td>
</tr>
<tr>
<td></td>
<td>Dispose of any existing railing. Construct a preservative treated pine railing using 2” x 4” top and bottom rails, and 2” x 2” balusters face nailed 6” on center. Create a 3’6” high railing between 4” x 4” end posts.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>3585.1</td>
<td>TREAD REPLACEMENT – EXTERIOR</td>
<td>3</td>
<td>EA</td>
<td>22.00</td>
<td>66.00</td>
</tr>
<tr>
<td></td>
<td>Dispose of damaged tread. Install 1-5/8” preservative treated pine stepping stock with screw shank nails.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>3875.1</td>
<td>HOUSE NUMBER SET</td>
<td>1</td>
<td>EA</td>
<td>42.00</td>
<td>42.00</td>
</tr>
<tr>
<td></td>
<td>Install 3” high metal or PVC house numbers on a 1” x 4” pine backer board painted with 2 coats of exterior white latex paint on siding to the right of the door.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

### FURNACE ROOM

<table>
<thead>
<tr>
<th>Item No.</th>
<th>Description</th>
<th>Quantity</th>
<th>Unit</th>
<th>Rate</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>6050.1</td>
<td>FURNACE &amp; DUCT – GAS: 80,000 BTU</td>
<td>1</td>
<td>EA</td>
<td>4,210.00</td>
<td>4,210.00</td>
</tr>
<tr>
<td></td>
<td>Install 80,000 BTU intermit. pilot, forced air furnace complete with plenum, insulated supply duct, galvanized return duct connected to wall registers, to service all rooms. Include setback thermostat, filter, fan and plenum control. Connect thimble breaching to chimney per code. Provide separate power circuit &amp; operating manual. System to maintain 70 F indoor temp when outside temp is –10 F. Min AFUE rating of 86.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>5210.1</td>
<td>DRYWALL – PATCH – LARGE</td>
<td>36</td>
<td>SF</td>
<td>5.00</td>
<td>180.00</td>
</tr>
</tbody>
</table>
Cut back defective gypsum to expose half of the studs on each side of the hole. Cut and tightly fit drywall patch. Glue and nail or screw patch. Apply tape and 3 coats of compound feathered out at least 8”. Wet sand ready for paint.

**KITCHEN**

<table>
<thead>
<tr>
<th>Item Code</th>
<th>Description</th>
<th>Quantity</th>
<th>Unit</th>
<th>Cost</th>
</tr>
</thead>
<tbody>
<tr>
<td>7595.1</td>
<td>RECEPTACLE – GFCI COUNTERTOP</td>
<td>3</td>
<td>EA</td>
<td>270.00</td>
</tr>
<tr>
<td></td>
<td>Install a flush mounted, ground fault circuit interrupted, ivory, duplex receptacle and ivory cover plate using #14 copper romex. Fish wire and repair all tear out.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>7835.1</td>
<td>RANGE HOOD EXTERIOR VENTED</td>
<td>1</td>
<td>EA</td>
<td>265.00</td>
</tr>
<tr>
<td></td>
<td>Install an exterior ducted enameled range hood with integral controls and light capable of 100 cfm at 70 some</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>s. Attach hood cabinet with screws. Include metal vent and roof or wall cap/damper assembly, using #14 copper romex. Owner’s choice of color.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>5490.1</td>
<td>PREP &amp; PAINT WALLS – SEMI-GLOSS</td>
<td>520</td>
<td>SF</td>
<td>270.40</td>
</tr>
<tr>
<td></td>
<td>Remove/cover hardware, fixtures, accessories not to be painted. Scrape loose, peeling, cracked and blistered areas. Clean oil, grease, fungus, dirt and dust from surfaces. Fill holes and cracks. Prime all new materials and spot prime existing with acrylic latex primer. Top coat with owner’s choice of premixed acrylic latex. Replace or uncover hardware, fixtures and accessories.</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**BATH**

<table>
<thead>
<tr>
<th>Item Code</th>
<th>Description</th>
<th>Quantity</th>
<th>Unit</th>
<th>Cost</th>
</tr>
</thead>
<tbody>
<tr>
<td>4150.1</td>
<td>TUB END WALL</td>
<td>1</td>
<td>EA</td>
<td>218.00</td>
</tr>
<tr>
<td></td>
<td>Frame a 2” x 4” wide partition at tub end for full ceiling height. Provide blocking for a showerhead fitting and a 2’ x 2’ access panel. Hang water resistant drywall, tape and finish with 3 coats of compound. Use metal corner bead around access panel opening. Make stops for access panel and use 4 round-headed screws to install panel of 1/2” BCX plywood with smooth, sanded edges.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Code</td>
<td>Description</td>
<td>Qty</td>
<td>Unit</td>
<td>Rate</td>
</tr>
<tr>
<td>--------</td>
<td>-----------------------------------------------------------------------------</td>
<td>-----</td>
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<td>--------</td>
</tr>
<tr>
<td>3680.1</td>
<td>TUB SURROUND – PREFAB &lt;br&gt;Install a white fiberglass or acrylic, 3 or 5 piece tub surround kit with a built-in soap dish. Caulk all joints with white, mildew resistant, siliconized caulk. Prepare substrate and attach panels using manufacturer’s recommended adhesive and fasteners.</td>
<td>1</td>
<td>EA</td>
<td>265.00</td>
</tr>
<tr>
<td>5560.1</td>
<td>PREP &amp; PAINT BATHROOM WALLS &lt;br&gt;Remove/cover all hardware and fixtures not to be painted. Wet scrape all loose cracked, peeling, blistered surfaces. Clean surfaces with household detergent. Fill all holes and cracks. Spot prime with acrylic latex. Apply top coat of owner’s choice of premixed acrylic latex semi-gloss.</td>
<td>1</td>
<td>RM</td>
<td>100.00</td>
</tr>
<tr>
<td>5930.1</td>
<td>UNDERLAY AND VINYL TILE &lt;br&gt;Install 5/16” underlayment grade plywood using 7d screw shank or cement coated nails, 6” on center allowing a 1/4” gap at wall. Lay 12” x12”x1/8” vinyl composition tile, color group B as made by Armstrong or Azrock, per manufacturer’s recommendations. Square to room axis. Include metal edge strips at openings, and shoe molding or 4” vinyl base around perimeter. Owner’s choice of in-stock color.</td>
<td>36</td>
<td>SF</td>
<td>2.95</td>
</tr>
<tr>
<td>6945.1</td>
<td>BATHTUB – 5’ STEEL COMPLETE &lt;br&gt;Install a 5’ white, enameled, formed steel, tub complete with lever operated pop up drain and overflow, PVC waste, molded base, metal two handle shower diverter, shower rod and Delta 6122 shower head.</td>
<td>1</td>
<td>EA</td>
<td>575.00</td>
</tr>
</tbody>
</table>

**SOUTHWEST BEDROOM**

<table>
<thead>
<tr>
<th>Code</th>
<th>Description</th>
<th>Qty</th>
<th>Unit</th>
<th>Rate</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>3260.1</td>
<td>REWORK INTERIOR DOOR - ENTRANCE DOOR &lt;br&gt;Rehang door. Adjust door and lockset to operate properly. If door rubs carpeting, trim bottom of door to clear carpeting.</td>
<td>1</td>
<td>EA</td>
<td>45.00</td>
<td>45.00</td>
</tr>
<tr>
<td>Item No.</td>
<td>Description</td>
<td>Quantity</td>
<td>Unit</td>
<td>Rate</td>
<td>Total</td>
</tr>
<tr>
<td>----------</td>
<td>--------------------------------------</td>
<td>----------</td>
<td>------</td>
<td>-------</td>
<td>--------</td>
</tr>
<tr>
<td>5495.1</td>
<td>PREP &amp; PAINT INTERIOR TRIM</td>
<td>1</td>
<td>RM</td>
<td>58.00</td>
<td>58.00</td>
</tr>
<tr>
<td></td>
<td>Remove or cover hardware/surfaces not to be painted. Wet scrape loose, cracked, peeling and blistered paint from all trim including doors, sash, and radiators. Feather edges and dull gloss with wet sanding. Clean oil, grease, dirt and dust from trim. Fill holes and caulk cracks. Spot prime. Apply one top coat of acrylic latex enamel. Finish type and color choice of owner.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>4010.1</td>
<td>CLOSET POLE</td>
<td>1</td>
<td>EA</td>
<td>24.00</td>
<td>24.00</td>
</tr>
<tr>
<td></td>
<td>Field measure and install 1-1/2” diameter wood closet pole and sockets.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>4015.1</td>
<td>CLOSET SHELF</td>
<td>3</td>
<td>LF</td>
<td>6.00</td>
<td>18.00</td>
</tr>
<tr>
<td></td>
<td>Install 1” x 12” closet shelf of #2 grade pine or B/C plywood, from wall to wall, supported on three sides by hood strip. If more than 4’ span, use center support bracket. If plywood, fill all cracks, holes and front edge cuts with putty, and sand smooth.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>2410.1</td>
<td>BASEBOARD – 1” X 4”</td>
<td>56</td>
<td>LF</td>
<td>2.10</td>
<td>117.60</td>
</tr>
<tr>
<td></td>
<td>Install 1” x 4”, #2 grade pine base with finish nails or tee headed brads.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>5235.1</td>
<td>LAMINATE 3/8” DRYWALL – WALLS &amp; CEILING</td>
<td>560</td>
<td>SF</td>
<td>1.25</td>
<td>700.00</td>
</tr>
<tr>
<td></td>
<td>Hang 3/8” gypsum over wall or ceiling surface with screws 8” on center and a bead of construction adhesive 20” on center. Butt drywall to door and window casing and apply J channel molding. Remove top molding from 3-piece base and reinstall after surface is paint-ready. Tape, 3-coat finish and sand ready for paint.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>5565.1</td>
<td>PREP &amp; PAINT BEDROOM</td>
<td>1</td>
<td>EA</td>
<td>150.00</td>
<td>150.00</td>
</tr>
<tr>
<td></td>
<td>Remove/cover all hardware, fixtures not to be painted. Wet scrape loose, cracked, peeling, blistered surfaces. Feather edges and dull gloss surfaces with sandpaper. Clean all surfaces with</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
household detergent. Spot prime and top coat trim, ceiling, walls, doors and windows with owner’s choice of premixed acrylic latex. Include any closets.
Exhibit B
Risk Assessment RFP
To:
From:
Date:
RE:

The City of Coolsville is accepting bids to perform a risk assessment for 1234 Main Street. Please find attached the Request for Proposal and information on the dwelling unit.

Please note that in order for the City to consider your bid to perform a risk assessment for this property, the proposal must include all items listed in the RFP. All submitted reports and documents must meet stated requirements.

Sealed bids must include technical and cost information and be submitted to Bruce Smith by 5 pm October 14, at 25 Glory Road, Coolsville, State, 12345. Any questions regarding this RFP should be directed to Bruce Smith, Rehab Specialist at (555) 333-2222.
Risk Assessment Proposal Requirements

1. **Background.** The purpose of this Request for Proposal (RFP) is to provide the Housing Agency (“Agency”) and property owners with information to help them manage and control lead-based paint hazards efficiently and effectively during rehabilitation activities, with particular attention to the requirements of the rule on federally-owned and assisted housing (24 CFR 35). This RFP is a request for a pre-rehabilitation risk assessment (or paint testing of surfaces to be disturbed, if applicable; collectively “evaluations”). Attached is the following information on the property to be evaluated, as applicable:

   a. Property Name
   b. Property Address
   c. Number of Buildings, if available
   d. Number of Units
   e. Building Address(es), if available
   f. Name of Owner
   g. Owner’s Address
   h. Name of Owner’s Management Agent
   i. Address of Owner’s Management Agent
   j. Building Construction
   k. Year of Construction
   l. A listing of all painted surfaces to be disturbed during the planned renovation. This list includes all interior and exterior surfaces of the dwelling, all common areas, if present, and all outbuildings and fences.

   a. **Personnel.** All work must be performed by firms certified to perform risk assessments and by individuals certified and/or licensed to perform risk assessments by the State (or EPA, if applicable) where the services are to be provided. If an X-ray fluorescence (XRF) instrument is used, all risk assessors must possess current training, certification and licensing in the use of the XRF equipment under appropriate federal, state or local authority. The Agency reserves the right to restrict the assignment of any individual, for any reasonable cause, as a risk assessor under the contract or any subcontracts.

   b. **Scope of Work.** The Contractor shall provide all necessary facilities, materials, supplies, equipment, supervision, and personnel and other items and services to perform the lead evaluation services as defined in this RFP. These services must be in accordance with applicable work practice standards of the state (or EPA, if applicable) where the services are provided. When more than one regulatory provision applies to a condition or activity, the most stringent shall be used. Applicable regulations are those that are in force when and where the lead evaluation is conducted, including, but not limited to:
U.S. Occupational Safety and Health Administration: 29 CFR 1926
U.S. Environmental Protection Agency (EPA): 40 CFR 745
State regulations
Local regulations

c. **Lead-Based Paint Hazards.** The purposes of the risk assessment are: 1) to identify conditions that may result in adverse human health effects from the following sources: deteriorated lead-based paint (LBP), interior dust-lead hazards, soil lead hazards, chewable surfaces, friction surfaces and impact surfaces, as defined by HUD and EPA; 2) to test paint on surfaces that will be disturbed during the renovation.

d. **The Risk Assessment Process.** The risk assessment shall include the following activities: occupant interviews, testing for lead content of all coatings on surfaces to be disturbed during the renovation, lead hazard identification of deteriorated paint, friction, impact and chewable surfaces, and dust and soil sampling. The risk assessment shall be completed within _____ days of the approval to begin work. The report must be submitted ____ days after completion of field work. Invoices will not be paid until the complete report is received and accepted by the Agency.

6. **Interviewing Occupants and Owner.** The risk assessor shall acquire whatever signed permission releases are needed to enter the dwelling and conduct the lead risk assessment. The risk assessor shall use the resident questionnaire from the HUD Guidelines and shall, at a minimum, collect the following information: age of the building, identify the numbers of occupants and their ages, with specific note being made of children under age six, women of childbearing age and other persons to be considered at risk from the hazards of lead. The risk assessor should interview the owner, if possible, to identify occupant use patterns and past and proposed maintenance and renovation activities.

7. **Laboratory Requirements.** All laboratories selected for use in the lead-based paint hazards and evaluation reports shall hold all accreditations, certifications and recognitions needed to conduct lead testing services as governed by regulatory agencies having jurisdiction over such work. At a minimum, the laboratory used by the contractor shall be recognized by the U.S. Environmental Protection Agency (EPA) National Lead Laboratory Accreditation Program (NLLAP) for the analyses performed under this contract, and shall, for work under this contract, use the same analytical method used for obtaining the most recent NLLAP recognition. Copies of certificates shall be provided with the offeror’s bid submittal.

8. **Identification of Lead-Based Paint.** The risk assessor shall sample all components/surfaces to be disturbed during the renovation, as well as any surface that is deteriorated or hazardous. If a component is not to be disturbed and is not a hazard, it should not be sampled for lead content. Identification of LBP may be done by either XRF testing or by collecting samples of paint followed by laboratory analysis.
a. **Portable XRF Testing.** Any portable X-ray fluorescence (XRF) instrument used to test for lead in paint shall have a valid XRF Performance Characteristic Sheet (PCS). Any portable XRF instrument used shall be used in accordance with its XRF PCS. [**Optional:** The requirements of American Society for Testing and Materials standard PS 95 Standard Provisional Practice for Quality Systems for Conducting In Situ Measurements of Lead Content in Paint or Other Coatings Using Field-Portable X-Ray Fluorescence (XRF) Devices, shall be used.]

b. **Paint Sample Collection Specifications.** Lead determination of coatings not applicable for X-ray fluorescence (XRF) testing (highly curved, ornate or restricted space locations) shall be tested by sample collection followed by laboratory analysis. For collected paint samples, the contractor shall insure that all area dimensions are collected and recorded in inches (or centimeters) to the nearest 1/16th of an inch. [**Optional:** The requirements of American Society for Testing and Materials Standard E 1729 Standard Practice for Field Collection of Dried Paint Samples for Lead Determination by Atomic Spectrometry Techniques, or its HUD-approved equivalent, shall be used for paint sample collection.] For each submitted sample, the contractor shall provide the laboratory with the collection dimensions in inches (or centimeters) to the nearest 1/16th of an inch, and obtain the results from the laboratory required for reporting. Areas from which samples are collected must be repaired after samples are collected (e.g., fill void created by sample collection and prime paint area.)

c. **Component Sampling within each Room or Area.**

i. **Windows.** When testing windows, at a minimum, the following window surfaces shall be tested: Exterior sash, jamb, casing and trough; Interior sash, casing and sill.

ii. **Doors.** When testing doors, at a minimum, the following surfaces shall be tested: jamb, both sides of the door itself and door casing.

iii. **Component Sampling Locations.** All testing shall include the following identification items: the room or area, component or portion of component tested, exact location of each component tested and the substrate. For example, Living Room/upper window sash/second window from wall B/wood. Substrates shall be identified as one of the following types: brick, concrete, drywall, metal, plaster, or wood. Other substrate types shall be assigned the closest among the designated types based on density, porosity, and other physical factors, with the report annotated with the actual substrate type.

d. **Wallpaper** shall be assumed to cover paint and shall be tested.
e. The risk assessor shall regard parts of the building components as separate testing combinations if visual indication or evidence exists that the different parts have separate and/or distinct painting histories.

9. **Identification of Dust Lead Hazards, Friction, Impact and Chewable Surfaces and Dust Wipe Sampling.** The risk assessment shall include identification of all lead hazards as defined by HUD and EPA. Dust sampling will be performed in accordance with the work practice standards of the state (or EPA, if applicable) in which the services are performed and in rooms where the greatest potential risk is expected. [**Optional:** The requirements of American Society for Testing and Materials Standard E 1728, Standard Practice for Field Collection of Settled Dust Samples Using Wipe Sampling Methods for Lead Determination By Atomic Spectrometry Techniques.] Dust samples shall be collected from floors and sills in all sampled living areas. The exact locations of each dust sample collected and each hazard identified shall be clearly identified. The presence of a dust-lead hazard in a dwelling unit or common area must be determined by comparing the hazard standard to the weighted arithmetic mean of all single-surface and composite dust sub-samples taken from the same component type in a dwelling unit or common area. Quality control samples must be taken and submitted for analysis with samples from each structure.

10. **Identification of Soil Lead Hazards and Sampling of Areas of Bare Soil.** Soil samples shall be taken any time the risk assessor identifies bare soil. Risk assessor must collect a minimum of two samples from play and non-play areas, with the option of an additional composite sample from the drip line/perimeter of the building. The risk assessor shall separately identify children’s play areas and non-play areas, if applicable. [**Optional:** Soil samples shall be collected in accordance with the requirements of ASTM Standard E-1727, Field Collection of Soil Samples for Lead Determination by Atomic Spectrometry Techniques.] 

11. **Hazard Control Options.** All hazard control options provided by the risk assessor must be technically feasible and specifically suited to the identified surface(s) or hazard. The control options must take into account the surfaces to be disturbed during the renovation, the condition of the property and the location and severity of hazards. Rough cost estimates shall be provided for all hazard control options. Risk assessors shall be advised that hazard control options provided by the risk assessors will be evaluated in the context of the Agency’s requirements under the Lead Safe Housing Rule (24 CFR Part 35). [**Optional:** For projects where the amount of federal rehabilitation assistance is $5,000-$25,000, the Agency is required only to perform interim controls. For projects where the amount of federal rehabilitation assistance exceeds $25,000, the Agency is required to abate all identified lead hazards (not all LBP).] Each hazard control option must be clearly identified as either being either interim control or abatement, according to applicable State, and/or HUD/EPA requirements. If abatement is performed, firms must be certified/licensed, in accordance with State and/or EPA requirements. [**Optional:** The risk assessor must also identify the type of training and/or certification/licensing necessary in the State where the services are provided for each person performing any lead hazard control option.]
12. **Minimum Report Requirements.** The risk assessment report shall comply with the minimum requirements established by the state (or EPA) where the services are provided. The risk assessment report shall contain at least the following:

   a. **Notice of Evaluation Results.** Completed copy of Notice of Evaluation Results suitable for distribution by the agency to the occupants.

   b. **Summary of Risk Assessment.** An executive summary written in simple and easy-to-understand English describing the on-site investigation conducted and the results. The summary must be in the basic format found at 24 CFR Part 35, Appendix B and include the names of all risk assessors performing services, the date the site was visited and samples collected. The summary must include all identified lead-based paint and/or lead-based paint hazards and their locations. In addition, it must include all treatment options for each hazard identified, clearly identified as either being either interim control or abatement.

   If paint testing is performed, the summary will include the information found at 24 CFR Part 35, Appendix A. It will also contain a list of all surfaces tested, with the unique test identification number (ID) for each testing combination and the results, the location description of the testing combination where any XRF measurement or paint sample was collected, the XRF and/or laboratory analysis measurement value with units of measure, i.e., for paint, mg/sq.cm, and the lead classification result for the surface as positive or negative.

   c. **Data Collected.** The risk assessor shall provide all interview questionnaires, sampling forms and field notes, all XRF results, raw data, analytical laboratory results, and all miscellaneous photographs or documents relating to the on-site visit, assessments and all paint, dust and soil samples collected.

   d. **List of all surfaces tested and/or sampled.**

   e. **Identification of all lead-based paint and/or LBP hazards with sufficient detail to permit replication of sampling and/or testing effort.**

   f. **Sketches or drawings of property with floor plan detailing all sample locations.**

   If the report is not clearly written and understood by the Agency, the Agency reserves the right to request clarifications and revisions by the risk assessor, at no additional cost to the agency.

13. **Required Submittals.** To be considered responsive, each bid must include technical and cost proposals, as well as copies of the following documents:

   a. Copies of firm’s certification to perform risk assessments of this site.

   b. Copies of risk assessor’s State/EPA certification/license.
c. Documentation of successful completion of XRF manufacturer’s training for each individual performing risk assessment services.
d. Copy of analytical laboratory EPA recognition (e.g. NLLAP or ELLAP), and licensing, if applicable.
e. Copy of risk assessment firm’s radiation safety license or registration issued by the State where services are to be provided, or the U.S. Nuclear Regulatory Commission.
f. Risk assessors shall have prior experience performing risk assessment projects and shall submit three references documenting past experience by providing: name, agency and contact telephone number.
g. Current resume (1-2 pages) for each risk assessor proposed to be used. At a minimum, this shall include a listing of the relevant certifications (with document numbers and effective dates), licenses, training, and experience for persons providing risk assessment services.

14. **[Optional: Unit Prices]**

Unit prices for the following services shall be including in the proposal. If requested by the Agency, risk assessors shall provide additional services at the unit costs submitted:

a. Site visit following Agency’s receipt of risk assessment report  
b. Additional paint, soil and dust sampling  
c. Additional paint testing
Exhibit C
Lead Based Paint Risk Assessment Report
LEAD HAZARD RISK ASSESSMENT & LIMITED LEAD-BASED PAINT TESTING REPORT

PERFORMED AT:
Private Residence (William Jones, Occupant)
123 Olympic Street
Coolsville, Anystate 12345

PREPARED FOR:
Mr. Bruce Smith
City of Coolsville
25 Glory Road
Coolsville, Anystate 12345

PREPARED BY:
(555) 333-2222

ABC Environmental
State Certification #00-0000
Susan McGee, KS00-011110
Massachusetts Street
Suite #2
Poolsville, Anystate 12346-2868
TEL: 000-541-0220
FAX: 000-541-0457
Project No.: XXXXX

This sample risk assessment report was prepared by Richard Baker of Baker Environmental Services, Lenexa, KS.
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ENVIRONMENTAL CONSULTANT:
ABC ENVIRONMENTAL

PROJECT CONTACT:  
Name:  Date:  

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Report Date: 10/11/01
EXECUTIVE SUMMARY

As a result of the Lead Hazard Risk Assessment and the limited Lead-Based Paint Testing (Assessment) conducted on 2/14/02, it was found that lead-based surface coatings (paint) and lead hazards were present on the subject property as of the date of the Assessment. The analytical results from this Assessment effort identified the following lead-based paint (LBP) and Lead hazards, as defined by EPA and/or HUD standards:

LBP

- Paint on All painted Exterior Components of the house, including the front porch

Existing Lead-Based Paint Hazards and Potential Lead Hazards

The following areas are coated with Lead-Based Paint (LBP) that is deteriorated and currently present existing lead-based paint hazards. All component substrates are wood.
- All exterior windows (windows are in fair condition)
- Roof fascia of house
- SW Bedroom door and door casing

A dust hazard was identified on the bathroom floor.

No soil lead hazards were identified.

The following areas are coated with LBP that is intact and that do not currently present lead hazards. However, the upcoming renovation plans include work inside the house and scraping and repainting the exterior. If these renovations occur, lead-safe work practices will need to be implemented during the project to ensure that lead hazards are not created.
- LBP on the exterior siding
- Front door and casing
- All exterior roof fascia and trim
- LBP on all front porch components (floor, columns, frame, railing, door)
- Bathroom wall
- Kitchen wall

The planned renovation includes disturbance of the following components that do not contain lead-based paint:
- Floors that were tested throughout the house
- Interior doors that were tested (except SW Bedroom)
- Interior walls in bedrooms and living room

Please remember that all identified LBP and Lead Hazards should always be properly addressed by professionally trained, experienced, and/or licensed lead workers.

Following is a report of the information collected during this Assessment:
IDENTIFYING INFORMATION

A Lead Hazard Risk Assessment and Limited LBP Testing (Assessment) was conducted at 1234 Main Street, in Coolsville, Anystate for Mr. Bruce Smith on 2/14/02. The Assessment was conducted by Susan McGee, a Certified Risk Assessor (Anystate License # KS00-011110). The purpose of the Assessment was to identify the presence of lead hazards on and/or in a limited number of surfaces inside and outside the residence, as well as to identify the presence of deteriorated lead-based paint (LBP) and LBP that may be disturbed during planned renovations. The City of Coolsville is providing funds from the U.S. Department of Housing and Urban Development to perform a remodeling project at this home. This Assessment was also completed to help the City and the homeowner determine if any of the upcoming HUD-funded renovation activities have the potential to create additional lead hazards. Based upon conversations with the Owner and the City of Coolsville Housing Agency (Client), to the knowledge of this Assessor, there has not been any previous LBP testing at this home.

As part of the Assessment, a visual survey of the property and structure was conducted, dust wipe sampling was performed on a limited number of interior surfaces, and composite soil samples were collected. In addition, limited on-site paint testing using an x-ray fluorescence (XRF) lead-in-paint analyzer was performed.

The Assessment was contracted for by Mr. Bruce Smith, City of Coolsville, Coolsville, Anystate 12345, (123) 456-7891. Further information concerning this project can be obtained from this contracting agency. The results of the limited assessment are summarized below.

IDENTIFIED LEAD HAZARDS

While the building and its paint was generally in good condition during the Assessment, the XRF results from the deteriorated paint that was tested showed that LBP hazards exist, as defined in the Residential LBP Hazard Reduction Act of 1992 (Title X) and as defined by the Environmental Protection Agency (EPA) regulation published in the January 5, 2001 Federal Register. The XRF results indicate that lead levels above EPA and/or US Department of Housing and Urban Development (HUD) criteria exist in the following locations:

Existing Lead Hazards

The following areas are coated with Lead-Based Paint (LBP) that is deteriorated and currently present existing lead-based paint hazards. All component substrates are wood.

1. All exterior windows (windows are in fair condition)
2. Roof fascia of house
3. SW Bedroom door and casing

Potential Lead Hazards

1. LBP is present on the exterior siding
2. LBP is present on the front door and casing
3. LBP is present on all exterior roof fascia and trim.
4. LBP is present on all front porch components.
5. LBP is present on bathroom and kitchen walls
A listing of environmental sampling locations and their associated lead contamination levels can be found in the sections addressing the analytical laboratory results for paint, dust, and soil.

Hazard control options and associated cost estimates for the areas or components identified with LBP or lead hazards are also discussed later in this report. In an effort to aid in the interpretation of the listed findings a glossary of terms and a list of publications and resources addressing lead hazards and their health effects is included at the end of this report.

**ONGOING MONITORING**

Ongoing monitoring is necessary in all dwellings in which LBP is known or assumed to be present. At these dwellings, the very real potential exists for LBP hazards to develop. Hazards can develop by means such as, but not limited to: the failure of lead hazard control measures; previously intact LBP becoming deteriorated; dangerous levels of lead-in-dust (dust lead) re-accumulating through friction, impact, and deterioration of paint; or, through the introduction of contaminated exterior dust and soil into the interior of the structure. Ongoing monitoring typically includes two different activities: re-evaluation and annual visual surveys. A re-evaluation is a risk assessment that includes limited soil and dust sampling and a visual evaluation of paint films and any existing lead hazard controls. Re-evaluations are supplemented with visual surveys by the Client, which should be conducted at least once a year. Client conducted visual surveys do not replace the need for professional re-evaluations. Visual surveys should confirm that all Paint with known or suspected LBP are not deteriorating, that lead hazard control methods have not failed, and that structural problems do not threaten the integrity of any remaining known, assumed or suspected LBP. The partial table below is taken from Table 6.1, Standard Re-evaluation Schedules, as found in the HUD publication entitled; Guidelines for the Evaluation and Control of LBP Hazards in Housing, dated June 1995, with September 1997 revisions. It is intended as a guideline for the Client to assess the condition of areas where hazard control activities occurred.

Factors at this residence require the use of Ongoing Monitoring Schedule item number three (3), to dictate monitoring protocol. Visual surveys by the Client should occur on at least a yearly basis for all painted surfaces. All surfaces that have undergone the hazard control strategy of Interim Controls, Encapsulation or Enclosure should also be checked during this survey. If components are replaced (windows), no re-evaluation or visual survey would be needed, since the LBP would have been removed with the old windows. Please refer to your community development agency, housing authority, or other applicable agency for additional local/regional regulations and guidelines governing re-evaluation activities.

**Standard Re-evaluation Schedule**

<table>
<thead>
<tr>
<th>Schedule</th>
<th>Original Evaluation Results</th>
<th>Action taken</th>
<th>Re-evaluation Frequency &amp; Duration</th>
<th>Visual Survey Schedule</th>
</tr>
</thead>
<tbody>
<tr>
<td>3</td>
<td>The average of leaded dust levels on all floors, interior windows, or window troughs sampled exceeds the applicable standard, but by less than a factor of 10.</td>
<td>A. Interim controls or a mixture of interim controls and abatement (not including window replacement). B. Mixture of interim controls and abatement plus replacement of all windows with lead hazards. C. Abatement of all lead-</td>
<td>1-2 Years. 3 Years. 4 Years.</td>
<td>Annually and whenever information indicates a possible problem except for encapsulants. The first visual survey of encapsulants should be done one month after clearance; the second should be done 6 months later and annually thereafter.</td>
</tr>
<tr>
<td></td>
<td>Based paint hazards, but not all lead-based paint.</td>
<td>None.</td>
<td>None.</td>
<td></td>
</tr>
<tr>
<td>---</td>
<td>-------------------------------------------------</td>
<td>-------</td>
<td>-------</td>
<td></td>
</tr>
<tr>
<td>D.</td>
<td>Abatement of all lead-based paint using encapsulation or enclosure.</td>
<td>None.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>E.</td>
<td>Removal of all lead-based paint.</td>
<td>None.</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**DISCLOSURE REGULATIONS**

A copy of this complete report must be made available to new lessees (tenants) and/or must be provided to purchasers of this property under Federal law before they become obligated under any future lease or sales contract transactions (Section 1018 of Title X – found in 24 CFR Part 35 and 40 CFR Part 745), until the demolition of this property. Landlords (Lessors) and/or sellers are also required to distribute an educational pamphlet developed by the EPA entitled “Protect Your Family From Lead in Your Home” and include standard warning language in their leases or sales contracts to ensure that parents have the information they need to protect their children from LBP hazards.

**FUTURE REMODELING PRECAUTIONS**

It should be noted that during this Assessment, a limited number of areas were tested for the presence of LBP. All LBP, dust, and soil hazards that were identified are addressed in this report. However, LBP, dust lead hazards, and/or soil lead hazards may be present at other locations of the property. Additional paint testing should precede any future remodeling activities that occur at any untested areas. Additional dust and/or soil sample collection and analysis should follow any hazard control activity, repair, remodeling, or renovation effort, and any other work efforts that may in any way disturb LBP and/or any lead containing materials. These Assessment activities will help the Client and owner to ensure the health and safety of the occupants and the neighborhood. Details concerning lead safe work techniques and approved hazard control methods can be found in the HUD publication entitled: “Guidelines for the Evaluation and Control of LBP Hazards in Housing” (June 1995 & 1997 Revision).
CONDITIONS & LIMITATIONS

Staff of ABC Environmental has performed the Client requested tasks listed above in a thorough and professional manner consistent with commonly accepted standard industry practices, using state of the art practices and best available known technology, as of the date of the assessment. ABC Environmental cannot guarantee and does not warrant that this Assessment/Limited LBP Testing has identified all adverse environmental factors and/or conditions affecting the subject property on the date of the Assessment. ABC Environmental cannot and will not warrant that the Assessment/Limited Testing that was requested by the client will satisfy the dictates of, or provide a legal defense in connection with, any environmental laws or regulations. It is the responsibility of the client to know and abide by all applicable laws, regulations, and standards.

The results reported and conclusions reached by ABC Environmental are solely for the benefit of the client. The results and opinions in this report, based solely upon the conditions found on the property as of the date of the Assessment, will be valid only as of the date of the Assessment. ABC Environmental assumes no obligation to advise the client of any changes in any real or potential lead hazards at this residence that may or may not be later brought to our attention. Further conditions and limitations to this contracted report are included in the general terms and conditions supplied to the client with the contract for services.
SITE INFORMATION AND FIELD TESTING

RESIDENT QUESTIONNAIRE

A resident questionnaire was completed as part of the Assessment, to help the Client identify particular use patterns, which may be associated with potential LBP hazards, such as opening and closing windows painted with LBP. The answers to the questionnaire were obtained during an interview with the occupants, Mr. and Mrs. Homeowner. Following is a summary of the information obtained during that interview:

- **Children in the Household:** 2 (Ages 1, 3)
- **Children’s bedroom locations:** SW bedroom
- **Children’s eating locations:** Kitchen
- **Primary interior play area(s):** Living Room
- **Primary exterior play area(s):** Back Yard; on and near play equipment
- **Toy Storage:** NA
- **Pets:** 2 cats (indoor)
- **Children’s blood lead testing history:** NA
- **Observed chewed surfaces:** NA
- **Women of child bearing age:** 1
- **Previous lead testing:** None
- **Most frequently used entrances:** Front door
- **Most frequently opened windows:** Kitchen and Living Room
- **Structure cooling method:** Central Air Conditioning
- **Gardening – type and location(s):** Previous vegetable garden (in back yard)
- **Plans for landscaping:** None
- **Cleaning regiment:** Weekly
- **Cleaning methods:** Mopping, sweeping, dusting, vacuuming
- **Recently completed renovations:** None recent
- **Demolition debris on site:** None
- **Resident(s) work in lead industry:** None
- **Planned renovations:** A preliminary Scope of Work document for this residence was supplied prior to the onset of the Assessment. A copy of that document is included in Appendix E of this report. The planned renovation is through the City of Coolsville program. A complete list of pending renovation activities can be obtained from Mr. Bruce Smith, City of Coolsville, Anystate.

BUILDING CONDITIONS SURVEY

- **Date of Construction:** 1937
- **Apparent Building Use:** Residential
- **Setting:** Residential
- **Front Entry Faces:** East
- **Design:** Bungalow
- **Construction Type:** Wood framed, wood shingles
Lot Type: Slight slope, drains to the east
Roof: Fair (curled shingles), no apparent roof leaks
Foundation: Good, no known basement leaks or visible foundation cracks
Front Lawn Condition: Approx. 10% bare soil
Back Lawn Condition: Aprox. 20% bare soil; existence of play structure
Drip Line Condition: Some Paint chips along the driplines
Site Evaluation: Very good
Exterior Structural Condition: Exterior structural is good and paint condition is fair.
Interior Structural Condition: Excellent
Overall Building/Site Condition: Very Good

PAINT CONDITION SURVEY

Please Note: EPA and HUD have provided a specific definition for the term “deteriorated paint.” Deteriorated paint is defined as “any interior or exterior paint or other coating that is peeling, chipping, chalking or cracking, or any paint or coating located on an interior or exterior surface or fixture that is otherwise damaged or separated from the substrate.” This definition is most typically associated with surface conditions only. Usage of this term in describing conditions other than those associated with surface coatings are not known to be defined by EPA or HUD.

IDENTIFIED DETERIORATED PAINT, PAINT CONDITIONS, LEAD CONTENT, & MOST APPARENT CAUSE OF DETERIORATION:

- Paint on the exterior windows, portions of porch and fascia are peeling over wood. Testing in these areas revealed lead levels above HUD standards. Moisture and age are the most likely causes of the damage.

The remaining paint exhibited no apparent signs of deterioration, as of the date of the Assessment.
PAINT SAMPLING AND TESTING

Limited LBP Testing, conforming with HUD Guidelines 24 CFR 35 Section 35.930 (c), (d) [Optional: and the requirements of American Society of Testing and Materials (ASTM) standard PS 95-98, Standard Provisional Practice for Quality Systems for Conducting In Situ Measurements of Lead Content in Paint or Other Coatings Using Field-Portable X-Ray Fluorescence (XRF) Devices] was accomplished at this residence on surfaces found to have deteriorated paint and/or where it was indicated to the Assessor that planned renovation would occur. No paint chip samples were taken. On 2/14/02, a total of 23 tests (assays) were taken at a limited number of specified surfaces on the inside and outside of the residence using an x-ray fluorescence analyzer. Deteriorated paint and areas that were specified to be disturbed during the planned renovation project were tested. Lead concentrations that meet or exceed the HUD published levels identified as being potentially dangerous (e.g., greater than or equal to 1.0 milligrams per centimeter square \( \geq 1.0 \text{ mg/cm}^2 \)) were encountered on the exterior siding and trim, the exterior window components and trim, and all front porch components.

Some of the remaining test locations exhibited lead-in-paint levels below the HUD levels, but in great enough quantities to be detectable by our XRF analyzer. It should be noted that lead concentrations (in paint) that are less than the levels that identify a surface coating as LBP still have the potential of causing lead poisoning. Should these or any potential LBP painted components and/or surfaces be disturbed in any manner that generates dust, extreme care must be taken to limit its spread. It should be assumed that any and all painted surfaces, components, or surfaces not requested to be tested as part of this investigation, or any previous investigations, are coated with LBP, and that renovation or repair activities in these areas dictate the use of safe work practices that limit dust generation and area contamination.

Testing was performed by Susan McGee, a State of Anystate certified Risk Assessor, using the Radiation Monitoring Device (RMD) LPA-1 X-ray Fluorescence analyzer (S/N 12934, State of Anystate license #XX-XXXX). Please refer to the appendices for the detailed XRF, dust and soil sampling analytical reports.

INTERIOR DUST SAMPLING

A total of 6 single surface dust wipe samples were collected in an effort to help to determine the levels of lead-containing dust on the interior windowsills and floors. These samples were collected from areas most likely to be lead contaminated if lead-in-dust is present. These samples were collected in accordance with the requirements of ASTM Standard E-1728, Standard Practice for Field Collection of Settled Dust Samples Using Wipe Sampling Methods for Lead Determination by Atomic Spectrometry Techniques. EPA, HUD and State of Anystate regulations define the following as dangerous levels for lead dust in residences: floors – ≥40 \( \mu \text{g/ft}^2 \) (micrograms per square foot); interior windowsills – ≥250 \( \mu \text{g/ft}^2 \); and, interior window troughs – ≥400 \( \mu \text{g/ft}^2 \). Please refer to Appendix B – Dust Wipe Analytical Results for the laboratory reports and to Appendix I – Lead and Lead Safety Information and Resources for a list of publications and resources addressing lead hazards and their health effects; both are located at the end of this report. As indicated below, dangerous levels of leaded dust, as defined by HUD, was detected in one sample. This sample was obtained from the bathroom floor and constitutes a dust-lead hazard in that room.
<table>
<thead>
<tr>
<th>Type</th>
<th>Location</th>
<th>Component</th>
<th>Sample Size (ft²)</th>
<th>Sample Location</th>
<th>Test Results (μg/ft²)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Dust Wipe</td>
<td>Bathroom</td>
<td>Floor</td>
<td>1.00</td>
<td>Floor, Center of room.</td>
<td>80.0</td>
</tr>
<tr>
<td>Dust Wipe</td>
<td>Living Room</td>
<td>Sill</td>
<td>0.66</td>
<td>Wood, Wall A, sill.</td>
<td>41.1</td>
</tr>
<tr>
<td>Dust Wipe</td>
<td>Kitchen</td>
<td>Floor</td>
<td>1.00</td>
<td>Carpet, Center of room.</td>
<td>&lt;20.0</td>
</tr>
<tr>
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<td>Kitchen</td>
<td>Sill</td>
<td>0.50</td>
<td>Wood, Wall D, sill.</td>
<td>&lt;40.0</td>
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<td>1.00</td>
<td>Carpet, Center of room.</td>
<td>&lt;20.0</td>
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<td>Sill</td>
<td>0.74</td>
<td>Wood, Wall C, sill</td>
<td>&lt;27.0</td>
</tr>
</tbody>
</table>

**Laboratory Information:**

Anytown Laboratories  
2222 West Street  
Anytown, Anystate 00000  
(800) 234-5678  

Dust Wipe Analysis Protocol:  
EPA Method SW846, 7420, implementing a microwave-assisted digestion process.  

Dust Wipe medium used:  
Lead-Wipes, ASTM # E1792-96a  

National Lead Laboratory Accreditation  
Program Serial number:  
#XXXXXXXX

**SOIL SAMPLING AND LABORATORY INFORMATION**

Two (2) composite soil samples were collected at this residence in accordance with the requirements of ASTM Standard E-1727, Standard Practice for Field Collection of Soil Samples for Lead Determination by Atomic Spectrometry Techniques. A Composite sample is a sample containing soil from a stated number of locations mixed together to form a Composite sample. The first sample consisted of soil from four locations in the front yard flower garden at 1’ on center (O.C.). The second sample was collected from four separate locations in the B (south) sideyard at 1’ O.C.. The samples were collected from bare soil areas only. The analytical results did not identify lead concentrations at or above the levels that EPA and HUD identifies as dangerous. See the following table for a summary of the soil sampling results. Please refer to Appendix C – Soil Sample Analytical Data for the detailed analytical reports. Testing data in bold face indicates lead levels at or above the EPA Dangerous Levels of Lead regulations that were published on January 5, 2001.

<table>
<thead>
<tr>
<th>Type</th>
<th>Location</th>
<th>Comments</th>
<th>Test Results (μg/g)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Composite</td>
<td>Front flower garden</td>
<td>Bare Soil sample</td>
<td>990</td>
</tr>
<tr>
<td>Composite</td>
<td>Backyard under play equipment – play area</td>
<td>Bare Soil sample</td>
<td>260</td>
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Laboratory Information:
Soil Analysis Protocol: EPA Method SW846, 7420, implementing a microwave-assisted digestion process.

National Lead Laboratory Accreditation Program Serial number: #XXXXXX
**LEAD HAZARD CONTROL OPTIONS AND COST ESTIMATES**

Lead-safe work practices and worker/occupant protection practices complying with current EPA, HUD and OSHA standards will be necessary to safely complete all work involving the disturbance of LBP coated surfaces and components. In addition, any work considered Lead hazard control will enlist the use of interim control (temporary) methods and/or abatement (permanent) methods. It should be noted that all lead hazard control activities have the potential of creating additional hazards, or even creating hazards that were not present before. All persons and/or firms performing lead hazard control activities must have received proper training in Lead-Safe Work Practices and/or Lead Abatement. Details for the listed lead hazard control options and issues surrounding occupant/worker protection practices can be found in the publication entitled: *Guidelines for the Evaluation and Control of LBP Hazards in Housing (June 1995 & 1997 Revision)* published by the HUD, as well as in the Occupational Safety and Health Administration (OSHA) regulations found in 29 CFR, Part 1926.62, known as the OSHA Lead Exposure in Construction Industry Standard.

The associated cost estimates, unless otherwise noted, include the labor and materials to accomplish the stated activity and most additional funds typically found to be necessary to complete worker protection, site containment, and cleanup procedures. These are approximate estimates only and due to a variety of potential factors, may not accurately reflect all local cost factors. A precise estimate must be obtained from a certified LBP abatement contractor or a contractor trained in lead safe work practices. Properly trained and/or licensed persons, as well as properly licensed firms (as mandated) should accomplish all abatement/interim control activities conducted at this residence.

**Interim controls,** as defined by HUD, means a set of measures designed to temporarily reduce human exposure to LBP hazards and/or lead containing materials. These activities include, but are not limited to: component and/or substrate repairs; paint and varnish repairs; the removal of dust-lead hazards; renovation; remodeling; maintenance; temporary containment; placement of seed, sod or other forms of vegetation over bare soil areas; the placement of at least 6 inches of an appropriate mulch material over an impervious material, laid on top of bare soil areas; the tilling of bare soil areas; extensive and specialized cleaning; and, ongoing LBP maintenance activities.

**Abatement,** as defined by HUD, means any set of measures designed to permanently eliminate LBP and/or LBP hazards. The product manufacturer and/or contractor must warrant abatement methods to last a minimum of twenty (20) years, or these methods must have a design life of at least twenty (20) years. These activities include, but are not necessarily limited to: the removal of LBP from substrates and components; the replacement of components or fixtures with lead containing materials and/or lead containing paint; the permanent enclosure of LBP with construction materials; the encapsulation of LBP with approved products; the removal or permanent covering (concrete or asphalt) of soil-lead hazards; and, extensive and specialized cleaning activities.

**SPECIAL CLEANING PRECEDING LEAD HAZARD CONTROL ACTIVITIES**

a) Before any lead hazard control activities begin, the structure and site must be inspected and pre-cleaned following HUD specified cleaning protocols, as detailed in the Guidelines for the Evaluation and Control of LBP Hazards in Housing (June 1995 & 1997 Revision), published by the U.S. Department of Housing and Urban Development. Some of the required steps include removing large debris and paint chips followed by HEPA vacuuming of all horizontal surfaces (floors, windowsills, troughs, etc.). The cleaning protocols described in this publication can assist the contractor in doing a preliminary cleaning and improving the chances of passing clearance.
HAZARD 1: Scraping LBP on the exterior siding and trim

a) INTERIM CONTROLS - STABILIZATION: A lead hazard could be created if the exterior siding is prepared for repainting (scraped) during the upcoming renovations. Any work that will disturb these surfaces must be carried out by properly trained lead workers, following lead-safe work practices. Following preparation work, the lead-based paint coatings on the exterior siding and trim may be addressed by stabilizing the surfaces with new paint. This activity has the potential to create a high volume of lead-contaminated dust, and extra care must be taken by the contractor to limit and contain the dust generated.

Stabilization $XX/S.F.

b) ABATEMENT - ENCLOSURE: Another safe and effective method of remediation in this area would be enclosing all exterior siding and trim with vinyl siding and pre-finished aluminum wrap materials. Caulk should be used to seal the bottom of the siding to the house and prevent leaded dust from falling through to the ground. This method usually generates smaller amounts of lead contaminated dust than does scraping and re-painting, and would permanently enclose the surfaces, eliminating future hazards. Even though the potential for leaded dust contamination is generally less with this method of remediation, special attention to work practices will be necessary to limit dust generation.

Siding/Trim Enclosure (per square foot) $XX/S.F.

HAZARD 2: Scraping LBP on all exterior window components and trim

a) INTERIM CONTROLS - STABILIZATION: A lead hazard could be created if the exterior window components and trim is prepared for repainting (scraped) during the upcoming renovations. Any work that will disturb these surfaces must be carried out by properly trained lead workers, following lead-safe work practices. Following preparation work, the lead-based paint coatings on the exterior window components and trim may be addressed by stabilizing the surfaces with new paint. This activity has the potential to create a high volume of lead-contaminated dust, and extra care must be taken by the contractor to limit and contain the dust generated.

Stabilization $XX/S.F.

b) ABATEMENT - REPLACEMENT: Installation of replacement windows is another possible remediation option. This involves removing the exterior window components and installing new replacement windows. This activity has the potential to create a high volume of lead-contaminated dust. All windows must be sealed off from the inside of the house during the duration of the work and extra care must be taken by the contractor to limit and contain the dust generated.

Removal of exterior window components and installation of replacement windows. $XXX/ea.

HAZARD 3: Scraping LBP on all painted front porch components (floor, columns, frame, door)

a) INTERIM CONTROLS - STABILIZATION: A lead hazard could be created if the front porch components are prepared for repainting (scraped) during the upcoming renovations. Any work that will disturb these surfaces must be carried out by properly trained lead workers, following lead-safe work practices. Following preparation work, the lead-based paint coatings on the front porch components may be addressed by stabilizing the surfaces with new paint. This activity has the potential to create a high volume of lead-contaminated dust, and extra care must be taken by the
 contractor to limit and contain the dust generated.

Stabilization – Per Square Foot $XXX/S.F.

b) **ABATEMENT - REPLACEMENT:** The removal and replacement of all of the porch components is another possible option for lead hazard control. This remediation option has the potential to generate extremely high amounts of lead contaminated dust and would require extensive containment.

Replacement of all porch components $XXX- $XXX

HAZARD 4: Removal of bathroom floor dust-lead hazard

**a) INTERIM CONTROLS – REMOVAL OF DUST LEAD HAZARD AND STABILIZATION:**

An existing dust-lead hazard on the bathroom floor must be removed prior to any other rehabilitation activities in this room. This room must be carefully inspected and cleaned following HUD-specified cleaning protocols. As the area is prepared for replacement of the plumbing fixtures and repainting, lead-safe work practices must be used. All of the required procedures for control and containment of dust to this room must be used. Any work that will disturb these surfaces must be carried out by properly trained lead workers. Following preparation work, the lead-based paint coatings on the bathroom walls may be addressed by stabilizing the surfaces with new paint. This activity has the potential to create a high volume of lead-contaminated dust, and extra care must be taken by the contractor to limit and contain the dust generated.

Removal of leaded dust and Stabilization of bathroom walls $XXX/S.F.

**b) ABATEMENT - REPLACEMENT:** The removal and replacement of all of the bathroom walls components is another possible option for lead hazard control. This remediation option has the potential to generate extremely high amounts of lead contaminated dust and would require extensive containment. Abatement would normally not be the most feasible or cost-effective approach for this room, but remains an option.

Replacement of painted components in bathroom $XXXX

**SPECIAL CLEANING FOLLOWING LEAD HAZARD CONTROL ACTIVITIES**

**a) Following all lead hazard control activities, the structure and site must be inspected and cleaned following HUD indicated cleaning protocols, as detailed in the Guidelines for the Evaluation and Control of LBP Hazards in Housing (June 1995 & 1997 Revision), published by the U.S. Department of Housing and Urban Development. The cleaning protocols described in this publication can assist the contractor in thoroughly, properly and safely cleaning the site.**

Interim Control – Follow all lead-safe work practice procedures to reduce dust lead content to less than acceptable clearance level (40 micrograms per square foot for floors). Cleaning must be accomplished following the HUD indicated cleaning protocols, as detailed in the Guidelines for the Evaluation and Control of LBP Hazards in Housing (June 1995 & 1997 Revision), published by the U.S. Department of Housing and Urban Development. The cleaning protocols described in this publication can assist the contractor in thoroughly, properly and safely cleaning the site.

**ADDITIONAL NOTES:**

Clean up of the remediated areas should be accomplished on an ongoing basis throughout all activities that impact or disturb any known or assumed lead containing materials (LCM) and Paint. When a material, surface
coating, substrate, component, or surface is to be impacted as a result of any activity and the lead content is not known, those areas and/or items should be assumed to contain lead-based paint. Accumulation of debris is not recommended, and all plastic drop cloths must be replaced and disposed of properly each day. All trash must be promptly and properly removed from the site and the area left clean and as close to original condition as possible. Following the HUD guidelines will help increase the chances of attaining HUD and State of Anystate lead-in-dust clearance levels.

Please remember that lead testing occurred at a limited number of locations in the structure; LBP and/or LCM could still be present in the unit at areas not tested as part of this Lead Hazard Risk Assessment. Great care should be taken by the Client and Contractor if, at a later date, any repair, maintenance, remodeling or renovation activities disturb any paint where the concentrations of lead are not known. In lieu of any additional testing, all surfaces and Paint should be assumed to contain lead-based paint.
APPENDIX A

XRF LEAD-BASED PAINT TESTING RESULTS
<table>
<thead>
<tr>
<th>Reading Number</th>
<th>Location 1</th>
<th>Side</th>
<th>Structure</th>
<th>Feature</th>
<th>Condition</th>
<th>Substrate</th>
<th>Color</th>
<th>Result</th>
<th>Lead (mg/cm²)</th>
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</thead>
<tbody>
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<td>1</td>
<td>LR</td>
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<td>Wall</td>
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<td>Good</td>
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<tr>
<td>2</td>
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<td>Door</td>
<td>Interior side</td>
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<td>White</td>
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<td>Tan</td>
<td>POS</td>
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<td></td>
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<td>Front Porch</td>
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<td>Wall</td>
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<td>Posts</td>
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<td>C</td>
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</tr>
</tbody>
</table>

1 See Sketch in Appendix A

Performed by ABC Environmental, 920 Massachusetts Avenue, Poolsville, Anystate 12346-2868,
APPENDIX B

DUST WIPE SAMPLE ANALYTICAL DATA
**ANYTOWN LABORATORIES INCORPORATED**

2222 West Street
Anytown, Anystate 00000 (555) 234-5678 · 800-ANY-LABS · (Fax) 111-2468
Excellence in Customer Service and Technology
AIHA/ELLAP 100100, NVLAP 0000, CAELAP 1111, RRLAP 1010

**LABORATORY ANALYSIS REPORT**

Lead Analysis by EPA 3050B/7420 Method

<table>
<thead>
<tr>
<th>ALI Sample No</th>
<th>Client Sample No</th>
<th>Sample Description</th>
<th>Sample Area (ft²)</th>
<th>Dilution Factor</th>
<th>Total Lead (ug)*</th>
<th>Lead Concentration (ug/ft²)</th>
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</thead>
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<tr>
<td>021559</td>
<td>1234-1</td>
<td>Bathroom floor-center</td>
<td>1.0</td>
<td>1</td>
<td>80.0</td>
<td>80.0</td>
</tr>
<tr>
<td>021560</td>
<td>1234-2</td>
<td>Living Rm Sill</td>
<td>.66</td>
<td>1</td>
<td>41.1</td>
<td>41.1</td>
</tr>
<tr>
<td>021561</td>
<td>1234-3</td>
<td>Kitchen Floor</td>
<td>1.00</td>
<td>1</td>
<td>&lt;20.0</td>
<td>&lt;20.0</td>
</tr>
<tr>
<td>021562</td>
<td>1234-4</td>
<td>Kitchen D Sill</td>
<td>1.00</td>
<td>1</td>
<td>&lt;40.0</td>
<td>&lt;40.0</td>
</tr>
<tr>
<td>021563</td>
<td>1234-5</td>
<td>Mstr Bdrm Floor</td>
<td>1.00</td>
<td>1</td>
<td>&lt;20.0</td>
<td>&lt;20.0</td>
</tr>
<tr>
<td>021564</td>
<td>1234-6</td>
<td>Mstr Bdrm Sill</td>
<td>0.74</td>
<td>1</td>
<td>&lt;27.0</td>
<td>&lt;27.0</td>
</tr>
</tbody>
</table>

| QC – 18081    | 10.0 ppm Calibration Std | | | 1,012.3 | 101.2% |
| QC – 18081    | 200 ug spike            | | | 210.7  | 105.4% |
| QC – 18081    | 5.0 ppm Calibration Std | | | 521.7  | 104.4% |
| QC – 18081    | Blank                    | | | <20.0  |        |
| QC – 18081    | NIST 2710 Standard       | | | 569.7  | 103.0% |

**JUDITH JUNE**

ANALYST: Judith June

**Matthew Monday, CIH**

Total No. of Pages in Report: 1

Minimum Reporting Limit: 20 ug Total Lead. Effective 3/6/01, EPA Lead Hazard Standards: 40 ug/ft² for floors and 250 ug/ft² for interior window sills, 400 ug/ft² for window troughs. Industrial projects may have limits established per project. *For true values, assume two (2) significant figures.
DUST LEAD SAMPLE FORM

PROJECT NAME: City of Caldwell
ADDRESS: 1234 Main Street
BEC PROJECT NUMBER: XXXXX

<table>
<thead>
<tr>
<th>DATE</th>
<th>SAMPLE NUMBER</th>
<th>LOCATION</th>
<th>COMPONENT</th>
<th>SAMPLE SIZE</th>
<th>COMMENTS</th>
</tr>
</thead>
<tbody>
<tr>
<td>2/14/02</td>
<td>1234-1</td>
<td>BATHRM</td>
<td>FLOOR</td>
<td>15 sq ft.</td>
<td>CENTER OF ROOM</td>
</tr>
<tr>
<td>2/14/02</td>
<td>1234-2</td>
<td>LIVING RM</td>
<td>SILL</td>
<td>.66 sq ft.</td>
<td></td>
</tr>
<tr>
<td>2/14/02</td>
<td>1234-3</td>
<td>KITCHEN</td>
<td>FLOOR</td>
<td>15 sq ft.</td>
<td></td>
</tr>
<tr>
<td>2/14/02</td>
<td>1234-4</td>
<td>KITCHEN</td>
<td>SILL-D</td>
<td>15 sq ft.</td>
<td></td>
</tr>
<tr>
<td>2/14/02</td>
<td>1234-5</td>
<td>MASTER BD RM</td>
<td>FLOOR</td>
<td>15 sq ft.</td>
<td></td>
</tr>
<tr>
<td>2/14/02</td>
<td>1234-6</td>
<td>MASTER BD RM</td>
<td>SILL</td>
<td>.74 sq ft.</td>
<td></td>
</tr>
</tbody>
</table>

SAMPL(E(S) COLLECTED BY:

Susan McGee
PRINTED NAME

COMMENTS:
Fax results upon completion of analysis.
Mail this original to the address indicated above.
Please analyze for LEAD content (µg/ft²).

Please provide 24 hour turn around time.

Chain of Custody

Received by: [Signature]
Submitted to lab by: [Signature]
Received in lab by: [Signature]

Date/Time: 2-15-02
Date/Time: 2-15-02
Date/Time:
APPENDIX C

SOIL SAMPLE ANALYTICAL DATA
ANYTOWN LABORATORIES
INCORPORATED
2222 West Street
Anytown, Anystate 00000 (555) 234-5678 • 800-ANY-LABS • (Fax) 111-2468
Excellence in Customer Service and Technology
AIHA/ELLAP 100100, NVLAP 0000, CAELAP 1111, RRLAP 1010
LABORATORY ANALYSIS REPORT
Lead Analysis by EPA 3050B/7420 Method

CLIENT #: ABC-123
CLIENT: ABC Environmental
ADDRESS: 7941 Westgate Street
Poolesville, Anystate 12346-2636
PO #: N/A
DATE COLLECTED: 2/14/02
DATE RECEIVED: 2/15/02
DATE ANALYZED: 2/15/02
DATE REPORTED: 2/15/02
SAMPLE TYPE: Soil
PROJECT NAME: City of Coolsville
JOB LOCATION: 1234 Main Street, Coolsville, Anystate 12345

<table>
<thead>
<tr>
<th>ALI Sample No</th>
<th>Client Sample No.</th>
<th>Sample Description</th>
<th>Sample Wt (mg)</th>
<th>Dilution Factor</th>
<th>Total Lead (ug)*</th>
<th>Lead Concentration (% by wt)</th>
<th>Lead Conc (ppm)</th>
</tr>
</thead>
<tbody>
<tr>
<td>021565</td>
<td>1234-S1</td>
<td>Front Flower Garden</td>
<td>1,580</td>
<td>1</td>
<td>980</td>
<td>.067</td>
<td>670</td>
</tr>
<tr>
<td>021566</td>
<td>1234-S2</td>
<td>Backyard-under play equipment</td>
<td>1,275</td>
<td>1</td>
<td>560</td>
<td>.045</td>
<td>450</td>
</tr>
</tbody>
</table>

| QC – 14669   | 10.0 ppm Calibration Std | 967.2 | 96.7% |
| QC – 14669   | 200 ug spike           | 196.0 | 98.0% |
| QC – 14669   | 5.0 ppm Calibration Std| 503.8 | 100.8%|
| QC – 14669   | Blank                  | >20.0 |       |
| QC – 14669   | NIST 2710 Standard     | 541.8 | 97.9% |

William W. Webster
ANALYST: William W. Webster
Total No. of Pages in Report: 1

Matthew Monday, CIH
REVIEWED BY: Matthew Monday, CIH, Dept. Head

Minimum Reporting Limit: 20 ug Total Lead. Effective 3/6/01, EPA Lead Hazard Standards: 40 ug/ft² for floors and 250 ug/ft² for interior window sills, 400 ug/ft² for window troughs. Industrial projects may have limits established per project. *For true values, assume two (2) significant figures.
SOIL SAMPLE FORM

PROJECT NAME: City of Columbus

ADDRESS: 1234 Main St.

BEC PROJECT NUMBER: XXXX

<table>
<thead>
<tr>
<th>DATE</th>
<th>SAMPLE NUMBER</th>
<th>LOCATION</th>
<th>COMPOSITE OR SINGLE SAMPLE</th>
<th>COMMENTS</th>
</tr>
</thead>
<tbody>
<tr>
<td>2/14/07</td>
<td>1234-51</td>
<td>Front garden</td>
<td>Composite</td>
<td></td>
</tr>
<tr>
<td>2/16/07</td>
<td>1234-52</td>
<td>Backyard</td>
<td>Composite</td>
<td>Play area</td>
</tr>
</tbody>
</table>

SAMPLE(S) COLLECTED BY:

Sue McCrea

PRINTED NAME

Sue McCrea

SIGNATURE

COMMENTS:
Fax results upon completion of analysis.
Mail this original to the address indicated above.
Please analyze for LEAD content (µg/ft²).

Please provide 24 hour turn around time.

Chain of Custody

Received by: Melody White

Date/Time: 2/15/03

Submitted to lab by: Melody White

Date/Time: 2/15/03
Insert site and floor plans here indicating the locations of XRF testing, soil lead and dust lead sampling performed at this property.
APPENDIX E

SCOPE OF RENOVATION WORK, AS PROVIDED TO ASSESSOR
If applicable, insert governing authority's supplied scope of planned renovation work on this page and all additional pages necessary.
APPENDIX F

COPY OF RISK ASSESSOR’S LICENSE/CERTIFICATION
Insert copy of State/EPA Risk Assessor license/certification here.
Insert copy of firm’s lead activity license/certification here.
APPENDIX H
COPY OF XRF TRAINING CERTIFICATE AND LPA-1 PERFORMANCE CHARACTERISTICS SHEET
Insert copy of XRF training certificate here.
Insert PCS sheet here.
APPENDIX I

ADDITIONAL LEAD AND LEAD SAFETY RESOURCE DATA
“LEAD SPEAK” A BRIEF GLOSSARY

COMMON LBP TERMS

LBP: Any and all paint that contains at least 1 milligram of lead per square centimeter of surface area (1.0 mg/cm²). This is infrequently expressed as 0.5% lead by weight and/or 5000 parts per million lead concentrations by dry weight.

LBP Hazards: Housing conditions that cause human exposure to unsafe levels of lead from paint. These conditions include, but are not necessarily limited to: deteriorated lead-based paint; friction, impact, or chewable surfaces; lead-contaminated dust; or, lead-contaminated soil.

Paint: Any and all paints, stains, varnishes, shellacs, epoxies, lacquers, polyurethanes, etc.

House Wall Identification Guide: The exterior wall that contains the front entry to the house is labeled as the A wall of the house. Proceeding clock-wise around the house label the remaining walls B, C, and D respectively. The interior room walls correspond to the exterior walls.

LEAD HAZARD EVALUATION METHODS

Visual Inspection: A visual evaluation of interior and exterior paint and surfaces in an effort to try to identify specific conditions that contributes to LBP hazards. A certified risk assessor or a Housing Quality Standards inspector trained in visual assessments should perform these inspections.

Paint Testing: Testing of specific surfaces that are coated with paint, by XRF (x-ray florescence) or lab analysis, to determine the lead content of these surfaces, performed by a certified LBP inspector or certified risk assessor.

Risk Assessment: An on-site investigation to help determine the existence of LBP hazards. This can include paint testing, dust and soil sampling, water sampling and a visual inspection. The risk assessment report identifies lead hazards and potential options for lead hazard control. A certified risk assessor must conduct the assessment.

Clearance Examination: Clearance is performed after hazard reduction, rehabilitation, renovation, repair, modernization, or maintenance activities to determine if a unit is safe for occupancy. It involves a visual inspection, analysis of dust and soil samples, and preparation of a report. A certified risk assessor that is independent from the company or individual conducting the lead hazard control activities should conduct the clearance examination.

X-Ray Fluorescence Analyzer (XRF): This device, often called a XRF, is used to help identify levels of lead in paint without disturbing the painted surfaces themselves. The unit uses gamma radiation to measure the lead content in the paint on a per square centimeter basis. Users of this device must be specially trained and licensed as Lead Inspectors and be licensed by State radioactive material regulatory licensing agencies.
LEAD POISONING

Environmental Intervention Blood Lead Level (EIBLL): The level of lead in blood that requires intervention in a child under the age of seventy-two (72) months. This is typically defined as a blood lead level of 20 μg/dL (micrograms per deciliter) of whole blood or above for a single test, or blood levels of 15-19 in two tests taken at least three months apart.

KEY UNITS OF MEASUREMENT

μg (Microgram): A microgram is 1/1000th of a milligram. To put this into perspective, a penny weighs 2 grams. To get a microgram, you would need to divide the penny into 2 million pieces. A microgram is one of those two million pieces.

μg/dL (microgram per deciliter): used to measure the level of lead in children’s and worker’s blood to establish whether intervention is needed. A deciliter is a little less than a half a cup.

μg/ft² (micrograms per square feet): the unit used to express levels of lead in dust samples. All reports should report levels of lead in dust in μg/ft².

mg/cm² (milligrams per centimeter square): used to report levels of lead in paint thru XRF testing.

PPM (parts per million): Typically used to express the concentrations of lead in soil. Can also be used to express the amount of lead in a surface coating on a mass concentration basis. This measurement can also be shown as: μg/g, mg/kg or mg/l.

PPB (parts per billion): Typically used to express the amount of lead found in drinking water. This measurement is also sometimes expressed as: μg/l.

EPA/HUD PUBLISHED LBP STANDARDS

Dust-thresholds for Lead-Contamination

- Floors: Less than (=) 40 μg/ft²
- Interior Window Sills: <250 μg/ft²
- Window Troughs: <400 μg/ft²

Soil-thresholds for Lead Contamination

- Play areas used by children 6 and under: <400 μg/gram or 400 parts per million (PPM)
- Other areas: <1200 μg/gram or 1200 parts per million (PPM)
- Threshold for abatement: <5000 μg/gram or 5000 parts per million (PPM)
THE FOLLOWING PUBLICATIONS AND RESOURCES CONTAIN ADDITIONAL INFORMATION ON LEAD AND LEAD HAZARDS:

**NATIONAL CENTER FOR HEALTHY HOUSING:**
www.leadsafehousing.org/

**NATIONAL LEAD INFORMATION CENTER & CLEARINGHOUSE:**
1-800-424 LEAD, Fax: 301-585-7976
www.epa.gov/lead/nlic.htm

**NATION LEAD ABATEMENT AND ASSESSMENT COUNCIL:**
1-800-590-6522 Fax: 301-924-0265
www.nllac.org

**HUD'S OFFICE OF HEALTH HOMES AND LEAD HAZARD CONTROL:**
www.hud.gov/offices/lead
Voice: 1-202-401-0388

**THE ALLIANCE TO END CHILDHOOD LEAD POISONING:**
www.aeclp.org/

**THE ENVIRONMENTAL PROTECTION AGENCY LEAD PROGRAMS:**
www.epa.gov/opptintr/lead
Voice: 1-202-260-2090

**ANYSTATE DEPARTMENT OF HEALTH AND ENVIRONMENT, LEAD POISONING PREVENTION PROGRAM**
www.dephealth..state.as.us/lead/

**ADDITIONAL INFORMATION:**
Lists of recalled products containing lead: www.safetyalerts.com
The Lead listing – for info on lead-related service providers and EPA accredited laboratories throughout the United States: www.leadlisting.org
Exhibit D
Revised Work Write-Up
Making it Work: Implementing the Lead Safe Housing Rule

Module 3: Rehabilitation Planning

This Work Write Up was developed for a fictional property. All specification language and costs are for discussion purposes only.

Work Item List Cover Sheet

Property Address: 123 Olympic Street

Owners: Susan and Bill Jones

Phone No: (111) 222-3333

Original Cost Estimate completed by: Bruce Smith Date: October 4, 2001
Total Initial Estimate: $10,092.55

Modifications completed by: Bruce Smith Date: October 18, 2001
Total Final Estimate: $14,210.20

Explanation for Modifications: Integrated results of risk assessment

Date Bids Sent To Contractors: __________________________

Bid Opening Date: __________________________

Bids Returned by: Amount

1. __________________ ____________       _______________
2. ________________ ______________   _______________
3. ________________ ______________   _______________

Rehab Specialist:___________________________

Witnessed by:_____________________________

Owner’s Acceptance: ________________________    Date:_______________________

Exhibit D: Revised Work Write-Up
WORK WRITE-UP FOR
123 OLYMPIC STREET
COOLSVILLE, ANY STATE  12345

PREPARED BY: Bruce Smith
DATE: OCTOBER 18, 2001

SPECIFICATIONS BY LOCATION

<table>
<thead>
<tr>
<th>Spec Number</th>
<th>Spec Description</th>
<th>Quantity</th>
<th>Units</th>
<th>Unit Price</th>
<th>Total Price</th>
</tr>
</thead>
<tbody>
<tr>
<td>0031.1</td>
<td>CONSTRUCTION DEFINITIONS</td>
<td>1.00</td>
<td>GR</td>
<td>0.00</td>
<td>0.00</td>
</tr>
<tr>
<td></td>
<td>“Install” means to purchase, set up, test and warrant a new component. “Replace”</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>means to remove and dispose of original material, purchase new material, deliver,</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>install, test and warrant. “Repair” means to return a building component to like</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>new condition through replacement, adjustment and recoating of parts. “Reinstall”</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>means to remove, clean, store and install a component.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>0035.1</td>
<td>VERIFY QUANTITIES/MEASUREMENTS</td>
<td>1.00</td>
<td>GR</td>
<td>0.00</td>
<td>0.00</td>
</tr>
<tr>
<td></td>
<td>All measurements (i.e. SF of Drywall, or those provided with drawings) are for</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>the contractor’s convenience prior to a mandatory site inspection to verify all</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>dimensions. All quantities (i.e. number of window units) are as stated. No claim</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>for additional funds due to discrepancies in measurements or quantities shall be</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>honored if not submitted at the time of the initial proposal.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>0039.1</td>
<td>HVAC PERMIT REQUIRED</td>
<td>1.00</td>
<td>EA</td>
<td>0.00</td>
<td>0.00</td>
</tr>
<tr>
<td></td>
<td>Prior to the start of the heating/cooling work, the contractor shall create a</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>heating distribution layout and perform heat/cooling loss calculations and all</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>other documentation needed to apply for, pay for and receive an HVAC permit on</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>behalf of the owner.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
### NEW MATERIALS REQUIRED

<table>
<thead>
<tr>
<th>Description</th>
<th>Quantity</th>
<th>Rate</th>
<th>Unit</th>
</tr>
</thead>
<tbody>
<tr>
<td>All materials used in connection with this work write-up are to be new, of</td>
<td>1.00</td>
<td>GR</td>
<td>0.00</td>
</tr>
<tr>
<td>first quality and without defects – unless stated otherwise or pre-approved</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>by Owner and Construction Specialist.</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

### 1 YEAR GENERAL WARRANTY

<table>
<thead>
<tr>
<th>Description</th>
<th>Quantity</th>
<th>Rate</th>
<th>Unit</th>
</tr>
</thead>
<tbody>
<tr>
<td>Contractor shall remedy any defect due to faulty material or workmanship</td>
<td>1.00</td>
<td>DU</td>
<td>0.00</td>
</tr>
<tr>
<td>and pay for all damage to other work resulting therefrom, which appear</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>within one year from final payment. Further, contractor shall furnish owner</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>with all manufacturers’ and suppliers’ written warranties covering items</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>furnished under this contract prior to the release of the final payment.</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

### LEAD SAFE WORK PRACTICES

On all work items flagged as “interim controls” or as requiring “lead safe work practices”, workers must use lead safe work practices per 24 CFR 35.1350. These practices are represented in the “Lead Safety Field Guide” (*Lead Paint Safety: A Field Guide for Painting, Home Maintenance, and Renovation Work*) published by HUD, EPA, and DCD as HUD Publication #HUD-1779-LHC, March 2001 or any HUD-approved Lead Safe Work Practices class. Work disturbing lead-based paint is not considered complete until clearance, if required, is achieved.

### WORKER TRAINING – INTERIM CONTROLS

All persons carrying out activities flagged as “interim controls” or as requiring “lead safe work practices” must either be supervised by an EPA abatement supervisor or provide proof of completion of HUD-approved worker training course in lead safe work practices prior to start of work.

### TEMPORARY RELOCATION

All occupants must be out of the work area while work items flagged as “interim controls” or as...
requiring “lead safe work practices” are underway. Children and women of childbearing age are specifically prohibited from entering the dwelling at any time during the reduction process, including times when work is not in progress. Provide moving and packing services to and from temporary housing unit. Pay all utility hook-up fees for both moves as well as daily rental costs.

9122  GROUND CONTAINMENT
During the period of work on exterior windows and porch, maintain ground containment. Attach two layers of 12’ wide 6 mil polyethylene to the building perimeter with staples or furring strips extending 10’ past work station. Construction a worksite perimeter curb of 4 x 4 timbers wrapped under the containment. Create an outer barrier of flags or plastic tape 3’ on center, 20’ from work site. Close and lock all windows and doors on work site elevation. Remove and replace daily.

<p>| | | |</p>
<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>6</td>
<td>DY</td>
<td>$65.00</td>
</tr>
</tbody>
</table>

9133  PRE-CLEAN
Before any rehabilitation or interim controls activities begin, the structure and site must be inspected and pre-cleaned following HUD specified cleaning protocols, as detailed in the Guidelines for the Evaluation and Control of LBP Hazards in Housing (June 1995 & 1997 Revision), published by the U.S. Department of Housing and Urban Development. Some of the required steps include removing large debris and paint chips followed by HEPA vacuuming of all horizontal surfaces (floors, windowsills, troughs, etc.). The cleaning protocols described in this publication can assist the contractor in doing a preliminary cleaning and improving the chances of passing clearance inspections after remediation.

<p>| | | |</p>
<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>1200</td>
<td>SF</td>
<td>.75</td>
</tr>
</tbody>
</table>

9129  FINAL CLEAN
After completion of all rehabilitation using safe work practices and interim controls perform a final clean. Wet mist, fold and remove all containment plastic. Remove plastic from floors last. HEPA vacuum all visible surfaces including

<p>| | | |</p>
<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>1200</td>
<td>SF</td>
<td>.75</td>
</tr>
</tbody>
</table>
clothing, furniture, walls, floors and ceilings from the top down. Detergent scrub all horizontal surfaces in small sections using a 3-bucket cleaning system. Completely rinse with clean water and new supplies. After surface is dry, HEPA vacuum all visible surfaces except ceiling.

<table>
<thead>
<tr>
<th>9030</th>
<th>CLEARANCE EXAMINATION</th>
<th>1</th>
<th>EA</th>
<th>$275.00</th>
<th>$275.00</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>After completion of all work that disturbed LBP and any other lead hazard reduction activities, a qualified person shall perform a clearance examination in accordance with 24 CFR Part 35, including visual inspection and dust wipe samples. The clearance examiner must be independent from the contractor performing the work.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**EXTERIOR**

<table>
<thead>
<tr>
<th>3185.2</th>
<th>FRONT DOOR – PREHUNG METAL ENTRANCE</th>
<th>1.00</th>
<th>EA</th>
<th>450.00</th>
<th>450.00</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Dispose of door and frame. Install a prehung metal, insulated, 4-panel entrance door and jamb including interior and exterior casing, spring metal weatherstripping, interlocking threshold, wide angle peepsight, one entrance and one mortised deadbolt keyed alike. Prime and top coat. <strong>Lead-based paint is present on door and casing. Use Lead Safe Work Practices as described in Spec #9000 above.</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

| 9156 | SCRAPE AND REPAINT WINDOW COMPONENTS AND TRIM: INTERIM CONTROLS - STABILIZATION: Mist affected painted areas with water. Scrape all loose paint. Feather edges with a sponge sanding block. Saturate with de-glossing agent. Rinse and HEPA-vacuum small visible chips. Allow surface to dry, spot prime, and topcoat with premium acrylic latex paint from a single manufacturer. Color to be determined by the owner. | 15 | EA | 70.00 | 1050.00 |
### ROOFING

<table>
<thead>
<tr>
<th>Description</th>
<th>Qty</th>
<th>Unit</th>
<th>Rate</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>TEAR OFF AND REROOF SHINGLES</td>
<td>12</td>
<td>SQ</td>
<td>145.00</td>
<td>1,740.00</td>
</tr>
<tr>
<td>Remove and dispose of all roofing &amp; defective sheathing. Cut a 1” wide vent at ridge board. Replace up to 5 sf of sheathing per 100 sf of roof using pine board or CDX plywood of matching thickness. Staple 15 lb felt. Install preformed aluminum, drip edge, and vent pipe boots. Install a 220 lb fiberglass asphalt, 3 tab shingle with a 25 year warranty. Replace all flashing. Install shingle-over ridge vent.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>REPAIR FASCIA 1” X 6”</td>
<td>1</td>
<td>LF</td>
<td>5.00</td>
<td>5.00</td>
</tr>
<tr>
<td>Install a 1” x 6”, #2 pine fascia with bevel cut joints using galvanized finish nails. Caulk over joints, and prime. <strong>Lead based paint is present on fascia. Use Lead Safe Work Practices as described in Spec #9000 above.</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

### PORCH

<table>
<thead>
<tr>
<th>Description</th>
<th>Qty</th>
<th>Unit</th>
<th>Rate</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>PREP &amp; PAINT PORCH</td>
<td>375</td>
<td>SF</td>
<td>1.00</td>
<td>375.00</td>
</tr>
<tr>
<td>Scrape all loose, peeling, cracked, blistered paint from porch, including floor, railing, ceiling, posts and trim. Feather edges and dull gloss by sanding. Rinse entire area with water. Let dry. Caulk all cracks. Spot prime and top coat with owner’s choice of premixed acrylic latex. <strong>Lead based paint is present on most porch surfaces. Use Lead Safe Work Practices as described in Spec #9000 above.</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>GUARD RAIL – WOOD</td>
<td>24</td>
<td>LF</td>
<td>15.00</td>
<td>360.00</td>
</tr>
<tr>
<td>Dispose of any existing railing. Construct a preservative treated pine railing using 2” x 4” top and bottom rails, and 2” x 2” balusters face nailed 6” on center. Create a 3’6” high railing between 4” x 4” end posts. <strong>Lead based paint is present on railing, column, wall, and posts. Use Lead Safe Work Practices as described in Spec #9000 above.</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>TREAD REPLACEMENT – EXTERIOR</td>
<td>3</td>
<td>EA</td>
<td>22.00</td>
<td>66.00</td>
</tr>
<tr>
<td>Dispose of damaged tread. Install 1-5/8” preservative treated pine stepping stock with</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
screw shank nails. **Lead based paint is present on porch floor. Use Lead Safe Work Practices as described in Spec #9000 above.**

<table>
<thead>
<tr>
<th>Item Code</th>
<th>Description</th>
<th>Quantity</th>
<th>Unit</th>
<th>Unit Price</th>
<th>Total Price</th>
</tr>
</thead>
<tbody>
<tr>
<td>3875.2</td>
<td>HOUSE NUMBER SET</td>
<td>1</td>
<td>EA</td>
<td>42.00</td>
<td>42.00</td>
</tr>
<tr>
<td></td>
<td>Install 3” high metal or PVC house numbers on a 1” x 4” pine backer board painted with 2 coats of exterior white latex paint on siding to right of the door. <strong>Lead based paint is present on siding. Use Lead Safe Work Practices as described in Spec #9000 above.</strong></td>
<td></td>
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</table>

**FURNACE ROOM**

<table>
<thead>
<tr>
<th>Item Code</th>
<th>Description</th>
<th>Quantity</th>
<th>Unit</th>
<th>Unit Price</th>
<th>Total Price</th>
</tr>
</thead>
<tbody>
<tr>
<td>6050.1</td>
<td>FURNACE &amp; DUCT – GAS: 80,000 BTU</td>
<td>1</td>
<td>EA</td>
<td>4,210.00</td>
<td>4,210.00</td>
</tr>
<tr>
<td></td>
<td>Install 80,000 BTU intermit. pilot, forced air furnace complete with plenum, insulated supply duct, galvanized return duct connected to wall registers, to service all rooms. Include setback thermostat, filter, fan and plenum control. Connect thimble breaching to chimney per code. Provide separate power circuit &amp; operating manual. System to maintain 70 F indoor temp when outside temp is –10 F. Min AFUE rating of 86.</td>
<td></td>
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</tbody>
</table>

<table>
<thead>
<tr>
<th>Item Code</th>
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<th>Quantity</th>
<th>Unit</th>
<th>Unit Price</th>
<th>Total Price</th>
</tr>
</thead>
<tbody>
<tr>
<td>5210.1</td>
<td>DRYWALL – PATCH – LARGE</td>
<td>36</td>
<td>SF</td>
<td>5.00</td>
<td>180.00</td>
</tr>
<tr>
<td></td>
<td>Cut back defective gypsum to expose half of the studs on each side of the hole. Cut and tightly fit drywall patch. Glue and nail or screw patch. Apply tape and 3 coats of compound feathered out at least 8”. Wet sand ready for paint.</td>
<td></td>
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<td></td>
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</table>

**KITCHEN**

<table>
<thead>
<tr>
<th>Item Code</th>
<th>Description</th>
<th>Quantity</th>
<th>Unit</th>
<th>Unit Price</th>
<th>Total Price</th>
</tr>
</thead>
<tbody>
<tr>
<td>7595.2</td>
<td>RECEPTACLE – GFCI COUNTERTOP</td>
<td>3</td>
<td>EA</td>
<td>100.00</td>
<td>300.00</td>
</tr>
<tr>
<td></td>
<td>Install a flush mounted, ground fault circuit interrupted, ivory, duplex receptacle and ivory cover plate using #14 copper romex. Fish wire and repair all tear out. <strong>Lead based paint is present on the wall. Use Lead Safe Work Practices as described in Spec #9000 above.</strong></td>
<td></td>
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</tbody>
</table>

<table>
<thead>
<tr>
<th>Item Code</th>
<th>Description</th>
<th>Quantity</th>
<th>Unit</th>
<th>Unit Price</th>
<th>Total Price</th>
</tr>
</thead>
<tbody>
<tr>
<td>7835.2</td>
<td>RANGE HOOD EXTERIOR VENTED</td>
<td>1</td>
<td>EA</td>
<td>275.00</td>
<td>275.00</td>
</tr>
</tbody>
</table>
Install an exterior ducted enameled range hood with integral controls and light capable of 100 cfm at 70 some. Attach hood cabinet with screws. Include metal vent and roof or wall cap/damper assembly, using #14 copper Romex. Owner’s choice of color. **Lead-based paint is present on the wall. Use Lead Safe Work Practices as described in Spec #9000 above.**

5490.2 PREP & PAINT WALLS – SEMI-GLOSS  520 SF 0.62 322.40
Remove/cover hardware, fixtures, accessories not to be painted. Scrape loose, peeling, cracked and blistered areas. Clean oil, grease, fungus, dirt and dust from surfaces. Fill holes and cracks. Prime all new materials and spot prime existing with acrylic latex primer. Top coat with owner’s choice of premixed acrylic latex. Replace or uncover hardware, fixtures and accessories. **Lead based paint is present on the walls. Use Lead Safe Work Practices as described in Spec #9000 above.**

**BATH**

9100.1 REMOVAL OF DUST LEAD HAZARD AND STABILIZATION (INTERIM CONTROLS) An existing dust-lead hazard on the bathroom floor must be removed prior to any other rehabilitation activities in this room. This room must be carefully inspected and cleaned following HUD-specified cleaning protocols. As the area is prepared for replacement of the plumbing fixtures and repainting, lead-safe work practices must be used. All of the required procedures for control and containment of dust to this room must be used. Any work that will disturb these surfaces must be carried out by properly trained lead workers. Following preparation work, the lead-based paint coatings on the bathroom walls may be addressed by stabilizing the surfaces with new paint. This activity has the potential to create a high volume of lead-contaminated dust, and extra
care must be taken by the contractor to limit and contain the dust generated.

<table>
<thead>
<tr>
<th>Item Number</th>
<th>Description</th>
<th>Quantity</th>
<th>Unit</th>
<th>Price</th>
</tr>
</thead>
<tbody>
<tr>
<td>4150.2</td>
<td>TUB END WALL</td>
<td>1</td>
<td>EA</td>
<td>228.00</td>
</tr>
<tr>
<td></td>
<td>Frame a 2” x 4” wide partition at tub end for</td>
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<td></td>
<td>full ceiling height. Provide blocking for a</td>
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<tr>
<td></td>
<td>showerhead fitting and a 2’ x 2’ access panel.</td>
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<td></td>
<td>Hang water resistant drywall, tape and finish</td>
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<tr>
<td></td>
<td>with 3 coats of compound. Use metal corner</td>
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<tr>
<td></td>
<td>bead around access panel opening. Make stops</td>
<td></td>
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<tr>
<td></td>
<td>for access panel and use 4 round-headed screws</td>
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<tr>
<td></td>
<td>to install panel of 1/2” BCX plywood with</td>
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<tr>
<td></td>
<td>smooth, sanded edges.</td>
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<tr>
<td></td>
<td><strong>Lead based paint is present on the wall, baseboard and shoe molding. Use Lead Safe Work Practices as described in Spec #9000 above.</strong></td>
<td></td>
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<td></td>
</tr>
<tr>
<td>3680.2</td>
<td>TUB SURROUND – PREFAB</td>
<td>1</td>
<td>EA</td>
<td>265.00</td>
</tr>
<tr>
<td></td>
<td>Install a white fiberglass or acrylic, 3 or 5</td>
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<tr>
<td></td>
<td>piece tub surround kit with a built-in soap dish.</td>
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<tr>
<td></td>
<td>Caulk all joints with white, mildew resistant,</td>
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<tr>
<td></td>
<td>siliconized caulk. Prepare substrate and attach</td>
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</tr>
<tr>
<td></td>
<td>panels using manufacturer’s recommended adhesive</td>
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</tr>
<tr>
<td></td>
<td>and fasteners. <strong>Lead based paint is present on the wall. Use Lead Safe Work Practices as described in Spec #9000 above.</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>5560.2</td>
<td>PREP &amp; PAINT BATHROOM WALLS</td>
<td>1</td>
<td>RM</td>
<td>120.00</td>
</tr>
<tr>
<td></td>
<td>Remove/cover all hardware and fixtures not to be</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>painted. Wet scrape all loose cracked, peeling,</td>
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<td></td>
</tr>
<tr>
<td></td>
<td>blistered surfaces. Clean surfaces with</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>household detergent. Fill all holes and cracks.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Spot prime with acrylic latex. Apply top coat of</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>owner’s choice of premixed acrylic latex semi-gloss. <strong>Lead based paint is present on the walls. Use Lead Safe Work Practices as described in Spec #9000 above.</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>5930.2</td>
<td>UNDERLAY AND VINYL TILE</td>
<td>36</td>
<td>SF</td>
<td>3.45 124.20</td>
</tr>
<tr>
<td></td>
<td>Install 5/16” underlayment grade plywood</td>
<td></td>
<td></td>
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</tr>
<tr>
<td></td>
<td>using 7d screw shank or cement coated nails, 6”</td>
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<tr>
<td></td>
<td>on center allowing a 1/4” gap at wall. Lay</td>
<td></td>
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</tr>
<tr>
<td></td>
<td>12” x12”x1/8” vinyl composition tile, color</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>group B as made by Armstrong or Azrock, per</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
manufacturer’s recommendations. Square to room axis. Include metal edge strips at openings, and shoe molding or 4” vinyl base around perimeter. Owner’s choice of in-stock color. **Lead based paint is present on the baseboard and shoe molding. Use Lead Safe Work Practices as described in Spec #9000 above.**

<table>
<thead>
<tr>
<th>Code</th>
<th>Description</th>
<th>Quantity</th>
<th>Unit</th>
<th>Price</th>
</tr>
</thead>
<tbody>
<tr>
<td>6945.2</td>
<td>BATHTUB – 5’ STEEL COMPLETE</td>
<td>1</td>
<td>EA</td>
<td>595.00</td>
</tr>
<tr>
<td></td>
<td>Install a 5’ white, enameled, formed steel, tub complete with lever operated pop up drain and overflow, PVC waste, molded base, metal two handle shower diverter, shower rod and Delta 6122 shower head. <strong>Lead based paint is present on the wall. Use Lead Safe Work Practices as described in Spec #9000 above.</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>3260.2</td>
<td>REWORK INTERIOR DOOR - ENTRANCE DOOR</td>
<td>1</td>
<td>EA</td>
<td>50.00</td>
</tr>
<tr>
<td></td>
<td>Rehang door. Adjust door and lockset to operate properly. If door rubs carpeting, trim bottom of door to clear carpeting. <strong>Lead based paint is present on door and casing. Use Lead Safe Work Practices as described in Spec #9000 above.</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>5495.2</td>
<td>PREP &amp; PAINT INTERIOR TRIM</td>
<td>1</td>
<td>RM</td>
<td>78.00</td>
</tr>
<tr>
<td></td>
<td>Remove or cover hardware/surfaces not to be painted. Wet scrape loose, cracked, peeling and blistered paint from all trim including doors, sash, and radiators. Feather edges and dull gloss with wet sanding. Clean oil, grease, dirt and dust from trim. Fill holes and caulk cracks. Spot prime. Apply one top coat of acrylic latex enamel. Finish type and color choice of owner. <strong>Lead based paint is present on the trim. Use Lead Safe Work Practices as described in Spec #9000 above.</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>4010.1</td>
<td>CLOSET POLE</td>
<td>1</td>
<td>EA</td>
<td>24.00</td>
</tr>
<tr>
<td></td>
<td><strong>MASTER BEDROOM</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
Field measure and install 1-1/2” diameter wood closet pole and sockets.

<table>
<thead>
<tr>
<th>Item</th>
<th>Description</th>
<th>Units</th>
<th>Rate</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>4015.1</td>
<td>CLOSET SHELF</td>
<td>3 LF</td>
<td>6.00</td>
<td>18.00</td>
</tr>
<tr>
<td></td>
<td>Install 1” x 12” closet shelf of #2 grade pine or B/C plywood, from wall to wall, supported on three sides by hood strip. If more than 4’ span, use center support bracket. If plywood, fill all cracks, holes and front edge cuts with putty, and sand smooth.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>2410.1</td>
<td>BASEBOARD – 1” X 4”</td>
<td>56 LF</td>
<td>2.10</td>
<td>117.60</td>
</tr>
<tr>
<td></td>
<td>Install 1” x 4”, #2 grade pine base with finish nails or tee headed brads.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>5235.1</td>
<td>LAMINATE 3/8” DRYWALL – WALLS &amp; CEILING</td>
<td>560 SF</td>
<td>1.25</td>
<td>700.00</td>
</tr>
<tr>
<td></td>
<td>Hang 3/8” gypsum over wall or ceiling surface with screws 8” on center and a bead of construction adhesive 20” on center. Butt drywall to door and window casing and apply J channel molding. Remove top molding from 3-piece base and reinstall after surface is paint-ready. Tape, 3-coat finish and sand ready for paint.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>5565.1</td>
<td>PREP &amp; PAINT BEDROOM</td>
<td>1 EA</td>
<td>150.00</td>
<td>150.00</td>
</tr>
<tr>
<td></td>
<td>Remove/cover all hardware, fixtures not to be painted. Wet scrape loose, cracked, peeling, blistered surfaces. Feather edges and dull gloss surfaces with sandpaper. Clean all surfaces with household detergent. Spot prime and top coat trim, ceiling, walls, doors and windows with owner’s choice of premixed acrylic latex. Include any closets.</td>
<td></td>
<td></td>
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</tr>
</tbody>
</table>
Module 4: Rehabilitation—Construction Phase

Module Objectives:
Students will be able to:
➢ Describe how to bid lead hazard reduction work
➢ List items to be discussed at pre-construction conference
➢ Describe how to monitor construction for lead compliance
➢ Describe how to relocate residents
➢ Explain how to conduct final inspection and clearance
➢ Explain impact of ongoing maintenance on the project

Module Overview: The module is summarized below.

<table>
<thead>
<tr>
<th>Introduction</th>
<th>Overview of Module</th>
</tr>
</thead>
<tbody>
<tr>
<td>Exercise 4-1 Contractor Selection</td>
<td>Participants read a brief scenario about Coolsville’s bid process and answer questions in small groups about the information that needs to be provided to contractors to make appropriate bids.</td>
</tr>
</tbody>
</table>
| Exercise 4-2 Pre-Construction Conference | Participants read a brief scenario regarding pre-construction conference and discuss as a large group:
  • Topics to be covered at the pre-construction conference
  • How to document the contractor’s commitment to these items. |
| Exercise 4-3 Occupant Protection | Participants read a brief scenario on relocating the Jones for one week and answer questions in small groups about how relocation must be done and their options. |
| Exercise 4-4 Construction Monitoring | Participants read a brief scenario on construction monitoring and, as a large group, answer questions about when and how to monitor lead hazard reduction projects. This exercise includes a component where the trainer shows pictures of job sites and the participants state “what is wrong with this picture”. |
| Exercise 4-5 Final Inspection and Clearance | Participants read a brief scenario on Final Inspection and in small groups answer questions about clearance and how to document that a project was properly done. Debrief highlights such items as how to read a clearance report. |
| Exercise 4-6 Ongoing Monitoring and Maintenance | Participants read a brief scenario on ongoing monitoring and as a large group discuss the requirements for ongoing monitoring and how they affect project planning. |
| Wrap-up | Review of Job File Checklist and other key resources. |
# Module 4: Rehabilitation -- Construction Phase

## List of Useful Resources

<table>
<thead>
<tr>
<th>Resource</th>
<th>Where to Find It</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Sample RFP for Contractors</td>
<td>Form 29</td>
</tr>
<tr>
<td>2. Pre-Construction Conference Checklist</td>
<td>Form 15</td>
</tr>
<tr>
<td>3. Rehabilitation Contract Addendum</td>
<td>Form 18</td>
</tr>
<tr>
<td>4. EPA Memo on Waste</td>
<td>Form 17</td>
</tr>
<tr>
<td>5. Contractor/Employee Certification of Worker Training</td>
<td>Form 16</td>
</tr>
<tr>
<td>6. Elderly Waiver for Relocation</td>
<td>Form 13</td>
</tr>
<tr>
<td>7. Protection of Occupant's Belongings and Worksite Preparation for Projects with Lead Hazard Reduction Activities</td>
<td>Form 20</td>
</tr>
<tr>
<td>8. Re-Occupancy Authorization</td>
<td>Form 27</td>
</tr>
<tr>
<td>9. Sample Clearance Report</td>
<td>Form 22</td>
</tr>
<tr>
<td>10. Clearance Report Review Worksheet</td>
<td>Form 21</td>
</tr>
<tr>
<td>11. Lead Paint Clearance Testing Reimbursement for HOME and CDBG Grantees</td>
<td>Form 50</td>
</tr>
<tr>
<td>12. Clearance Protocol for HUD-Assisted Properties</td>
<td>Form 51</td>
</tr>
<tr>
<td>13. Abatement Report Worksheet</td>
<td>Form 26</td>
</tr>
<tr>
<td>14. Post-Construction Safe Work Certification</td>
<td>Form 19</td>
</tr>
<tr>
<td>15. Ongoing Monitoring and Maintenance Certifications</td>
<td>Form 24</td>
</tr>
<tr>
<td>16. Rehabilitation Job File Checklist</td>
<td>Form 28</td>
</tr>
<tr>
<td>17. <em>Chapter 4: Addressing Lead-Based Paint in Rehabilitation Programs</em></td>
<td>Reference Manual Chapter 4</td>
</tr>
</tbody>
</table>
Module 4

Rehabilitation-Construction Phase

Learning Objectives

At the end of this module, students will be able to:

- Describe how to bid lead hazard reduction work
- List items to be discussed at pre-construction conference
- Describe how to monitor construction for lead compliance
- Describe how to relocate residents
- Explain how to conduct final inspection and clearance
- Explain impact of ongoing maintenance on the project

Exercise Overview

- Turn to Exercises (next page)
- In groups, complete exercises:
  - 4-1: Contractor Selection
  - 4-2: Pre-Construction Meeting
  - 4-3: Occupant Protection
- Record answers on worksheets
- Be prepared to report answers
- You have 15 minutes
Exercise 4-1: Contractor Selection

We are still with the Jones family. The scope of work for their rehabilitation project has been approved. Their job involves interim controls and is expected to cost about $14,000.

Now they need to select a contractor. The City of Coolsville provides the Jones’ with a list of approved contractors. The list includes contractors who have the proper training and qualifications to do lead work as well as the proper insurance and bonding requirements. The Jones choose three contractors from the list to bid on the project. Bruce Smith, the rehab specialist, sends out a bid package to all three.

Two weeks later, Bruce receives the sealed bids from the contractors. Bruce reviews the bids for cost reasonableness and then awards the contract to the lowest bidder, T & T Contractors. T & T Contractors stated they could do the work for $14,500.

Questions:

1. Given that this is a job that involves lead hazard reduction, what additional information should Coolsville include in its bid packet?

2. What type of qualifications or certifications does T & T need to have to perform the work on the Jones’ home?

3. If this were an abatement job, what type of qualifications or certifications would T & T need to have?
Exercise 4-2: Pre-Construction Conference

Bruce Smith meets with T & T Contractors for a pre-construction meeting. They walk through the home together and review the scope of work. He reviews the contract to show them changes that have been made to incorporate the requirements of the Lead Safe Housing Rule. Specifically, language has been added that makes T & T responsible for clean-up and states that Coolsville will only pay for one clearance test. Any costs for additional clearance tests must be absorbed by the contractor.

Questions:

1. Who should attend the pre-construction conference?

2. When should it be held?

3. How long should the meeting take?

4. What other issues or items regarding lead-based paint should Bruce review in the pre-construction meeting with T & T?

5. How are these requirements documented?

Work in small groups to answer the questions above. Write your answers in the space provided. You have 5 minutes.
Exercise 4-3: Occupant Protection

Bruce planned the job so that the Jones's can stay in their home through most of the work. Individual rooms are contained while work is done and worksite clearance is performed before they are opened up. The Jones’ have access to their kitchen and bathroom through most of the work. However, the Jones' need to be relocated from their home during week 4 of the construction project while work is done on the kitchen and bathroom. They need to be away from the unit for one week.

Questions:

1. What are the steps involved in relocating the Jones family?

2. How do you establish the relocation unit is lead-safe?

3. What if the Jones’ were to be relocated for a longer period of time? How would this change your approach?

4. What needs to be done before the Jones’ move back in to their home?

5. What if the Jones’ were an elderly couple? Would they be required to relocate from their home for the week?

Work in small groups to answer the questions above. Write your answers in the space provided.
You have 5 minutes.
Exercise Overview

• Turn to Exercises (next page)
• In groups, complete exercises:
  – 4-4: Construction Monitoring
  – 4-5: Final Inspection and Clearance
  – 4-6: Ongoing Maintenance
• Record answers on worksheets
• Be prepared to report answers
• You have 15 minutes.
Exercise 4-4: Construction Monitoring

At the conclusion of the pre-construction meeting, Bruce Smith issues the notice to proceed and T & T begins work on the Jones’ house. Bruce Smith plans to conduct inspections of the work before approving each invoice submitted by T & T. The contractor plans to invoice Coolsville on a monthly basis.

Questions:

1. How often should Bruce visit the job site and monitor T & T’s work?

2. What types of work practices should Bruce be looking for to ensure T & T is following proper safe work practices?

3. What should Bruce do if he sees unsafe work practices at the site?

4. Halfway through the project, T & T needs a change order for the project. Suppose the change order caused rehabilitation hard costs to go over $25,000. Does Bruce need to change the work method from interim controls to abatement?

Work in small groups to answer the questions above. Write your answers in the space provided.
You have 5 minutes.
Exercise 4-5: Final Inspection and Clearance

Bruce conducts a final inspection of the property to ensure that all the rehab work has been completed properly. Once the inspection is complete, T & T has arranged for the cleaning to be completed and a Risk Assessor to perform a clearance test on the property. The property passes clearance. T & T provides Bruce with the clearance report, lien releases, warranty information and a certification that safe work practices were followed.

Questions:

1. Who is qualified to conduct the clearance exam?

2. How soon after cleaning can the clearance test be performed?

3. What documents should be kept on file to show that the lead hazard reduction was properly completed?

4. If this was an abatement job, how would the job differ?

Work in small groups to answer the questions above.
Write your answers in the space provided.
You have 5 minutes.
Exercise 4-6: Ongoing Maintenance

Bruce Smith reviewed the lead hazard reduction notice with the Jones’ to help them understand the contents of the document. He also explained to them about future disclosure of the knowledge of lead-based paint in their home. At first they were upset about having to disclose this information, but Bruce reminded them they have the Notice of Lead Hazard Reduction and Clearance Report that they can give to realtors and future purchasers that explains the reduction work and that the home is safer. Bruce also spent time explaining maintenance methods they can do to help keep lead hazards a minimum such as wiping friction surfaces on a weekly basis to minimize the dust hazards.

Now that the work is complete, the City of Coolsville will place a lien on the property for $16,000. The loan is forgivable over a five-year period as long as the home is their primary residence. After the five years the lien will be released from the property.

Questions:

1. What are the ongoing responsibilities for:
   → The Jones’?
   → City of Coolsville?
   → The contractor?

2. What if this were a HOME rental Property?

3. How does the ongoing maintenance requirement affect project planning? Would you recommend that Coolsville scope the project differently if there is going to be ongoing maintenance?

Work in small groups to answer the questions above. Write your answers in the space provided. You have 5 minutes.
Closing Out the Job

- Have we covered all the steps?
  - See Rehab Job File Checklist (Form 28)
- What are the three most important factors in completing a homeowner rehabilitation project?

Key Resources: Contractors

- Contractor Selection
  - Sample Invitation to Bid (Form 29)
- Pre-Construction Conference
  - Pre-construction Conference Checklist (Form 15)
  - EPA Memo on Waste (Form 17)
  - Rehab Contract Addendum (Form 18)
Key Resources: Occupant Protection

- Interpretive Guidance
  - #54: Lead Safe Units
  - #R13: Interim Clearance
  - #J24: Elderly Consent
- Forms
  - Reoccupancy Authorization (Form 27)
  - Elderly Informed Consent Form (Form 13)
  - Guidance on Relocation (Form 34)

Key Resources: Final Inspection

- Post Construction SWP Certification (Form 19) – Optional
- Sample Clearance Report and Review Worksheet (Forms 21 and 22)
- Abatement Report Worksheet (Form 26)
- Sample Notice of Lead Hazard Reduction (Form 23)
- Clearance Reimbursement (Form 50)

Module 4: Wrap-Up

- We've covered the construction process
- Tomorrow
  - Refining Your Rehab Program
  - Homebuyer
  - TBRA
  - Special Needs Housing
Module 5: Evaluating Your Rehabilitation Program

**Module Objectives:** Students will be able to:
- Describe strategies to address common design challenges for rehab programs
- Evaluate their own program's compliance with the lead rules

**Module Overview:** The module is summarized below.

| Introduction       | • Overview of this module  
|                    | • Discussion of common challenges |
| Exercise 5-1: Tackling Design Challenges | Participants break into small groups. Each group is assigned a scenario. For their scenario, they must evaluate the plan proposed, list the pros and cons, and then come up with their own proposal.  
Each group records its results on a flipchart. |
| Gallery Walk       | Participants circulate in the room and examine other groups' work. |
| Debrief            | Participants share what they learned during the Gallery Walk and what most impressed them. |
| Exercise 5-2: Lead Wellness | Participants examine a “lead wellness” checklist for rehab programs and discuss how to fill it out. (But do not complete the full checklist at this time.) |
| Wrap up            | |
### Module 5: Evaluating Your Rehabilitation Program

#### List of Useful Resources

<table>
<thead>
<tr>
<th>Resource</th>
<th>Where to Find It</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Guidance on Presuming or Evaluating</td>
<td>Form 33</td>
</tr>
<tr>
<td>2. Guidance on Relocation</td>
<td>Form 34</td>
</tr>
<tr>
<td>3. Relocation Screening Sheet</td>
<td>Form 25</td>
</tr>
<tr>
<td>4. Sample Relocation Agreement</td>
<td>Form 30</td>
</tr>
<tr>
<td>5. Certification of Relocation Activities</td>
<td>Form 31</td>
</tr>
<tr>
<td>6. List of Training Resources</td>
<td>Form 35</td>
</tr>
<tr>
<td>7. Guidance on Insurance</td>
<td>Form 36</td>
</tr>
<tr>
<td>8. Rehabilitation Standards for Single Family Structures</td>
<td>Form 32</td>
</tr>
<tr>
<td>9. Information on Volunteer Programs</td>
<td>Form 52</td>
</tr>
</tbody>
</table>
Module 5
Refining Your Rehabilitation Program

Learning Objectives
At the end of this module, students will be able to:
• Describe strategies to address common design challenges for rehab programs
• Evaluate their own program’s compliance with the lead rules

Program Design
• What may change in your program because of the Lead Safe Housing Rule?
Exercise 5-1: Tackling Design Challenges

- Work in groups
- Read the scenario assigned to you
- Answer the questions projected on the screen (next slide)
- List your responses on the flipchart
- You have 20 minutes

Exercise 5-1: Flipchart

Present your analysis on the flipchart provided
- Is the proposed strategy a good idea?
- List its pros and cons
- Provide one good alternative

Sharing Answers

- Assign a “presenter” to stay at your table and explain your work.
- Visit with other groups to see their work.
- Trade places with the presenter -- everyone needs time to circulate
Debrief

- What did you see that interested you?

Additional Resources

- Guidance on Presuming or Evaluating (Form 33)
- Guidance on Relocation (Form 34)
- Relocation Screening Sheet (Form 25)
- Sample Relocation Agreement (Form 30)
- Certification of Relocation Activities (Form 31)
- List of Training Resources (Form 35)
- Guidance on Insurance (Form 36)
- Rehabilitation Standards for Single-Family Structures (Form 32)

Exercise 5-2: Lead Wellness

- Review the “Lead Wellness Checklist”
- In your groups, begin to answer the questions
- Make sure you understand how it works
- Finish at home
Wrap-Up

• Where we’ve been:
  - Through the rehab process
  - Into some design challenges
  - Evaluating our own programs

• Where we’re going:
  - Other programs: Homebuyer, TBRA, Special Needs
Exercise 5-1: Tackling Design Challenges

1. Read the scenario assigned to your group. Answer the following questions and record your answers on a flipchart.
   a. Is the strategy proposed a good idea?
   b. What are the pros and cons of the strategies?
   c. Propose one alternative.
2. Read the other scenarios to prepare for the Gallery Walk.

Your Flipchart should look like this:

<table>
<thead>
<tr>
<th>C – RELOCATION STRATEGIES</th>
</tr>
</thead>
<tbody>
<tr>
<td>GOOD IDEA?</td>
</tr>
<tr>
<td></td>
</tr>
<tr>
<td>PROS</td>
</tr>
</tbody>
</table>

ONE ALTERNATIVE:
Exercise 5-1: Scenarios A and B

A. Program Eligibility and Assistance Levels

The City of Billsville has two rehab programs:
- The Emergency Assistance Program (EAP) provides small deferred payment loans (usually under $6000) to address small but critical housing issues such as furnaces and roofing. Most of their clients for this program are elderly residents on fixed incomes.
- The Homeowner Rehab Program provides zero percent interest loans up to $35,000 to bring housing up to code and make other necessary improvements in owner-occupied single family dwellings. Participants make monthly payments on the loans once the project is completed.

Reviewing the subsidy limits for the EAP Program is an agenda item for this week's staff meeting. The Director has suggested limiting the EAP to $5000. Bill, the rehab specialist asks, “What happens if the emergency costs more than $5000?” Susan the finance specialist replies, “They will have to apply to the Homeowner rehab program.”

As for the Homeowner Rehab program, staff are concerned about their loans over $25,000. “Suppose we limit the federal assistance to those projects to $24,999”, suggests Dave, another finance specialist. “We could fund the rest with state funds and keep the level of assistance under $25,000.”

B. To Presume or To Evaluate? That is the question.

“It’s easy to predict where the lead is” says Jack, the rehab specialist, as he briefs Stan, the housing director of Traintown. “In our pre-1950 buildings, its everywhere – the walls, the windows, exterior, interior, you name it. In our 1950 – 60s stock, its in the windows and doors. After 1960, it gets hard to tell.”

Stan thinks about this and proposes the following: “Let’s presume that lead is present in all pre-1950 units and perform standard treatments. In units built between 1950 and 60, presume lead is only in the doors and windows. In the post 1960 units, we will have to do risk assessments.”

Jack replies, “Is that allowed? I know we can presume that lead is present, but I thought the presumption had to be for all applicable surfaces. I am also pretty sure we cannot presume the absence of lead.”
Exercise 5-1: Scenarios C and D

C. Relocation Strategies and Planning

The Village of Lewisburg is considering a relocation plan for the first time for their housing programs. Prior to the Lead Safe Housing Rule (LSHR), participants had the option to stay or leave their homes but received no financial assistance from the village to pay for temporary housing. The staff is revisiting the issue of relocation because of the requirements of the LSHR.

George, the rehab specialist stated, “The LSHR doesn’t make us pay for folks to relocate, it just tells us when they have to be out of their houses and how to protect their belongings. So I don’t think we have to change anything except that during our interview we say –by the way you’ll need to leave your house for 1-2 weeks during the construction period. Suggest that they go stay with their Mom or some friends.”

Sally another rehab specialist jumps in, “But the rule says they need to be relocated to a lead-safe unit? How are we supposed to ensure this? What if Mom’s house is in worse condition than their own house? Then what will we do? Are we on the hook for having to fix Mom’s house now, too?”

Trina the director suggests, “If a client does not have family or friends they can stay with let’s add the relocation costs to their total loan amount.”

D. Recruiting and Retaining Contractors -- In Good times and Bad

Spellman Township’s housing staff feels pretty good about their efforts to implement the Lead Safe Housing Rule (LSHR) into their rehab program. They feel as they’ve left no stone unturned. Just last week they sent out a Request for Qualifications (RFQ) for moving companies (to help relocate folks) and laboratories (for testing).

Barb walks into her director’s office and sighs, “I don’t know why I bother spending time with these guys!” “What’s wrong?” asks Elaine the director. Barb explains that she hand-held four general contractors though the new requirements for the LSHR. She helped all four (as well as their staff) register for the Abatement Supervisor and Worker training courses. Only one, FIX IT, had actually attended the course and passed the Supervisor test, but hadn’t bothered to register with the State and become licensed.

Elaine asked why the other three contractors didn’t go to the training. “The contractors had “paying” work that day”, explained Barb, “and they couldn’t afford to take the time off for training and miss a paying gig.”

Elaine ponders this dilemma and suggests, “Why don’t we use our HOME admin funds to cover the registration fee? Would that be enough?”
Exercise 5-1: Scenario E

E. Staff Training: Maintaining Capacity

The City of Skyline administers a Homeowner Rehab Program providing loans to qualified occupants up to $35,000. They City has its own staff perform the risk assessments for the units that go through this program. Skyline usually completes 15 of these projects a year.

During today’s staff meeting, Calvin, Skyline’s only rehab specialist, announced he will retire in six months. Calvin has worked for Skyline for 30 years. Everyone relies on Calvin to answers to their questions on everything from program rules to standard procedures. He plans to move to an active adult community 300 miles away two weeks after his last day on the job in Skyline.

Serena, the housing director, figures she has time to figure out what to do to keep production moving. No need to plan yet, Skyline’s Human Resources Office will probably not even post the job opening until Calvin’s last month on the job. They shouldn’t have a problem getting applicants, everyone always wants a city job.
Rehabilitation – Exercise 5-2  
Lead Wellness Program Checklist

Answer the following questions for your program. Note resources listed in “comments” column.

Also, each step lists one or more design considerations. These questions are not meant to be answered at this time; they simply highlight items to consider in your program design.

<table>
<thead>
<tr>
<th>Yes</th>
<th>No</th>
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### STEP 1: APPLICATION

1. Does your application form request all information needed to determine if the proposed project is subject to the Lead Safe Housing Rule (age of dwelling, etc.)

2. Does your application packet include the Lead Hazard Information pamphlet?
   See Form 1 for Pamphlet: Protect Your Family from Lead in Your Home.

3. Does your program application packet provide information to the applicant about lead hazard control (e.g. such as the possibility of a relocation)

**Design Considerations:**
- Should program eligibility and assistance criteria be modified?

### STEP 2: INSPECTION

2. Answer “yes” if either A or B is correct for all projects in the program.
   A. Is paint testing conducted on all surfaces scheduled for rehab by a certified paint inspector or risk assessor?
   Or
   B. Is lead-based paint presumed to be present?

3. Answer “yes” if either A or B is correct for all projects in the program.
   A. For jobs over $5000, is a risk assessment conducted by a certified risk assessor?
   Or
   B. Are lead hazards presumed to be present throughout the unit?

4. For each project, are the results of any paint testing and/or risk assessment documented in the project file?
### Making it Work  Module 5: Refining Your Rehabilitation Program

<table>
<thead>
<tr>
<th></th>
<th>Yes</th>
<th>No</th>
<th>Comments</th>
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<tbody>
<tr>
<td>5.</td>
<td>For each project, is a notice of lead hazard evaluation provided to the resident?</td>
<td></td>
<td>See Lead Hazard Evaluation Notice (Form 10)</td>
</tr>
<tr>
<td>6.</td>
<td>Is the level of assistance to the project clearly documented in every project file?</td>
<td></td>
<td>See Calculating Level of Rehabilitation Assistance Worksheets (Form 7) and Lead Safe Housing Requirements Screening Worksheet - Rehabilitation Addendum (Forms 5 and 6)</td>
</tr>
</tbody>
</table>

**Design Considerations:**
- *Does the program have a strategy for presuming or evaluating? Has adequate data been collected to develop such a strategy?*
- *Does the program have access to a sufficient number of qualified risk assessors and/or paint inspectors?*

### STEP 3: PROJECT PLANNING

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<th>Yes</th>
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<tbody>
<tr>
<td>7.</td>
<td>For each project, is the work write-up and cost estimate revised based on the results of any paint testing or risk assessment?</td>
<td></td>
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<td>8.</td>
<td>For each project, are residents clearly informed about the requirements for occupant protection (and relocation if necessary)?</td>
<td></td>
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<tr>
<td>9.</td>
<td>If the residents must be relocated, does the program have procedures to ensure that the relocation unit is lead safe?</td>
<td></td>
<td>See Elderly Waiver for Relocation (Form 13)</td>
</tr>
<tr>
<td>10.</td>
<td>If the resident is elderly, is the resident offered the option to stay in the unit during the rehabilitation, while being properly informed of the risks?</td>
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</tbody>
</table>

**Design Considerations:**
- *Does the program have a written relocation policy for lead hazard reduction projects?*

### STEP 4: CONTRACTOR SELECTION

<table>
<thead>
<tr>
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<th>Yes</th>
<th>No</th>
<th>Comments</th>
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<tbody>
<tr>
<td>11.</td>
<td>Does the RFP clearly state the nature of the job and the qualifications of the workers needed?</td>
<td></td>
<td>See Sample RFP for Contractors (29)</td>
</tr>
</tbody>
</table>

**Design Considerations:**
- *Is the pool of qualified contractors sufficient to meet demand?*
- *What can be done to increase the pool?*
- *Are contractor selection procedures efficient?*
### STEP 5: PRE-CONSTRUCTION CONFERENCE

<table>
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<tr>
<th>Yes</th>
<th>No</th>
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<tbody>
<tr>
<td></td>
<td></td>
<td><strong>12.</strong> At the pre-construction conference, is the contractor informed of the requirements related to lead hazard reduction:</td>
</tr>
<tr>
<td></td>
<td></td>
<td>- Use of trained or supervised workers</td>
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<tr>
<td></td>
<td></td>
<td>- Use of safe work practices</td>
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<td></td>
<td></td>
<td>- Prohibited practices</td>
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<td></td>
<td></td>
<td>- Occupant protection</td>
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<td></td>
<td></td>
<td>- Clean-up and Clearance</td>
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<td></td>
<td></td>
<td>See Pre-construction Construction Conference Checklist (Form 15)</td>
</tr>
</tbody>
</table>

|     |    | **13.** Is the contractor informed that he is responsible for passing a clearance examination? |

**Design Considerations:**
- *Do all appropriate parties attend the pre-construction conference?*

### STEP 6: CONSTRUCTION MONITORING

<table>
<thead>
<tr>
<th>Yes</th>
<th>No</th>
<th>Comments</th>
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<tbody>
<tr>
<td></td>
<td></td>
<td><strong>14.</strong> Are job sites monitored regularly to ensure that safe work practices are followed and that occupants and their belongings are properly protected?</td>
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<td><strong>15.</strong> Are instances of non compliance communicated to the contractor?</td>
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<td></td>
<td></td>
<td><strong>16.</strong> Are instances of non compliance corrected?</td>
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<td><strong>17.</strong> Are corrections documented?</td>
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<tr>
<td></td>
<td></td>
<td><strong>18.</strong> Is clearance performed before occupants are allowed into a work area?</td>
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<tr>
<td></td>
<td></td>
<td><strong>19.</strong> Is a notice of re-occupancy provided to the relocated residents before they return to their units? See Re-Occupancy Authorization (Form 27)</td>
</tr>
</tbody>
</table>

**Design Considerations:**
- *Are relationships in place with moving companies and laboratories?*

### STEP 7: FINAL INSPECTION AND CLEARANCE

<table>
<thead>
<tr>
<th>Yes</th>
<th>No</th>
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<tbody>
<tr>
<td></td>
<td></td>
<td><strong>20.</strong> Is clearance conducted at least one hour after the job is complete?</td>
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<td></td>
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<td><strong>21.</strong> Is clearance conducted by a certified paint inspector, risk assessor, or lead sampling technician?</td>
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<tr>
<td></td>
<td>Yes</td>
<td>No</td>
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<tr>
<td>22. Is clearance performed by a professional who is independent from the contractor(s) who performed the lead hazard reduction and rehabilitation?</td>
<td></td>
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</tr>
<tr>
<td>23. Is the clearance report reviewed to make sure it is adequate?</td>
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<tr>
<td>24. Is the clearance report kept in the project file?</td>
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<tr>
<td>25. If clearance is not passed, is the unit re-cleaned and is clearance performed again?</td>
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<tr>
<td>26. Is a notice of lead hazard reduction provided to the tenant within 15 days of passing clearance?</td>
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<tr>
<td>27. Is the project file properly documented to reflect compliance with all Lead Safe Housing Rule Requirements.</td>
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</tbody>
</table>

**Design Considerations:**
- Are procedures in place for interim and final clearance?
- Are relationships in place with clearance examiners and labs?

**STEP 8: ONGOING MAINTENANCE**

<table>
<thead>
<tr>
<th></th>
<th>Yes</th>
<th>No</th>
<th>Comments</th>
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</thead>
<tbody>
<tr>
<td>28. If ongoing maintenance is required, is the owner made aware of these requirements?</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>29. Are procedures in place to ensure that ongoing maintenance and monitoring take place according to the requirements of the lead safe housing rule?</td>
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</tbody>
</table>

**Design Considerations:**
- Should ongoing maintenance requirements affect project planning?
Module 6: Homebuyer Programs

Module Objectives:
Students will be able to:
- Describe requirements of Lead Safe Housing Rule for Homebuyer programs
- Complete a “lead wellness checklist” to assess their own program compliance
- Develop and share approaches to addressing common challenges faced by Homebuyer programs

Module Overview:

| Introduction | • Homebuyer requirements – what is required and who can do it?  
|             | • Types of programs effected  
|             | • Requirements  
|             | • Homebuyer vs. homebuyer/rehab programs  
|             | • Homebuyer’s option to test for lead  
|             | • Key program activities  
| Exercise 6-1: Lead Wellness | • Participants work directly with their colleagues to assess their own program compliance using the “lead wellness checklist”  
|             | • Group discusses questions and clarifies items on checklist  
| Exercise 6-2: Finding Solutions | • Participants work in small groups to find solutions to a number of scenarios.  
|             | • Each group prepares answers to one scenario to share with the large group.  
|             | • Large group shares and discusses answers.  
| Wrap-up |
# Module 6: Homebuyer Programs

## List of Useful Resources

<table>
<thead>
<tr>
<th>Resource</th>
<th>Where to Find It</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Lead Safe Housing Requirements Screening Worksheet</td>
<td>Form 5</td>
</tr>
<tr>
<td>2. Guidance on The Homebuyer’s Option to Test for Lead-Based Paint and Lead-Based Paint Hazards</td>
<td>Form 37</td>
</tr>
<tr>
<td>3. Disclosure Form—Sales</td>
<td>Form 3</td>
</tr>
<tr>
<td>4. Protect Your Family From Lead in Your Home pamphlet</td>
<td>Form 1</td>
</tr>
<tr>
<td>5. Sample Notice of Lead Hazard Reduction</td>
<td>Form 23</td>
</tr>
<tr>
<td>6. Sample Clearance Report</td>
<td>Form 22</td>
</tr>
<tr>
<td>7. Clearance Report Review Worksheet</td>
<td>Form 21</td>
</tr>
<tr>
<td>8. Sample Seller Certification (Homebuyer Program)</td>
<td>Form 40</td>
</tr>
<tr>
<td>9. Sample Notice to Lenders, Realtors, and Title Companies on the Lead Safe Housing Rule</td>
<td>Form 39</td>
</tr>
<tr>
<td>10. Homebuyer Program Lead Compliance Document Checklist</td>
<td>Form 38</td>
</tr>
<tr>
<td>11. Lead Paint Clearance Testing Reimbursement for HOME and CDBG Grantees</td>
<td>Form 50</td>
</tr>
<tr>
<td>12. Clearance Protocol for HUD-Assisted Properties</td>
<td>Form 51</td>
</tr>
</tbody>
</table>
Learning Objectives

At the end of this module, students will be able to:

• Describe requirements of the Lead Safe Housing Rule for homebuyer programs
• Complete a “lead wellness checklist” to assess program compliance
• Develop and share approaches to addressing common homebuyer program challenges

Programs Affected

• Homebuyer programs funded by:
  – HOME
  – CDBG
• Potential homebuyer assistance programs:
  ✓ Downpayment assistance
  ✓ Closing cost assistance
  ✓ Loan guarantee
  ✓ PMI assistance
  ✓ Subsidized interest rates
  ✓ Finance acquisition

See Reference Manual Chapter 6
### Requirements

<table>
<thead>
<tr>
<th>Approach</th>
<th>Identify and Address Deteriorated Paint</th>
</tr>
</thead>
<tbody>
<tr>
<td>Notification</td>
<td>Yes</td>
</tr>
<tr>
<td>Evaluation</td>
<td>Visual Assessment</td>
</tr>
<tr>
<td>Reduction</td>
<td>Paint Stabilization</td>
</tr>
<tr>
<td>Ongoing Maintenance</td>
<td>No</td>
</tr>
<tr>
<td>EIBLL Requirements</td>
<td>No</td>
</tr>
</tbody>
</table>

### Option to Test for Lead-Based Paint

- All buyers have 10 day option to test for lead-based paint
  - Risk assessment or paint inspection
- If evaluation shows lead based paint, buyer can get out of the contract
- Program design should take this into consideration

See Form 37: Guidance on The Homebuyer’s Option To Test For Lead-Based Paint and Lead-Based Paint Hazards

### Key Program Activities: Homebuyer

- Pre-purchase counseling
- Application
- Home selection
- Purchase contract
- Inspection
- Purchase negotiation
- Pre-closing
- Loan closing
- Post-purchase counseling

See Reference Manual Exhibit 6-2
Is this a homebuyer project?

- The Carters receive HOME-assistance to purchase a home. The forgivable loan includes funds for downpayment assistance and for repairs needed to bring the property to code.
- The Greens received downpayment assistance through the City's HOME-funded Homebuyer program. They select a home that was rehabilitated by ABC Housing using CDBG funds. ABC rehabs homes and puts them on the open market.

Exercise 6-1: Lead Wellness

- Work with your colleagues
- Answer each question for your homebuyer program
- See comments column for additional resources
- You have 15 minutes

What are your biggest challenges?
Common Challenges

- Working with realtors and lenders
- Communicating requirements to sellers
- Meeting notification/recordkeeping requirements
- Addressing rehabilitation needs of properties with lead based paint
- Helping buyers with option to test
- Educating homebuyers
- Educating buyers upfront about requirements of the program

Exercise 6-2: Finding Solutions

- Work in groups
- Read all scenarios
- Answer all questions
- Be prepared to report the answer to one scenario (assigned)
- You have 15 minutes

Wrap Up

You now know:
- Lead Safe Housing requirements for Homebuyer Programs
- Compliance issues in your program
- Steps you can take to facilitate compliance
### Homebuyer Exercise 6-1
#### Lead Wellness Checklist

<table>
<thead>
<tr>
<th>Pre-Purchase Counseling</th>
<th>Yes</th>
<th>No</th>
<th>Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td>If your agency has a contract with another agency to provide pre-purchase counseling, have the counselors been briefed about the Lead Safe Housing Rule (LSHR) requirements?</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

#### Notices and Information

<table>
<thead>
<tr>
<th>Notices and Information</th>
<th>Yes</th>
<th>No</th>
<th>Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td>Does the buyer always receive the following prior to signing the contract?</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>a. Lead Hazard Information Pamphlet</td>
<td></td>
<td></td>
<td>See Form 1, Protect Your Family From Lead in Your Home</td>
</tr>
<tr>
<td>b. Disclosure Form</td>
<td></td>
<td></td>
<td>See Form 3 for Disclosure Form-Sales</td>
</tr>
<tr>
<td>c. Information on their right to request a lead hazard evaluation</td>
<td></td>
<td></td>
<td>See Form 37 for Guidance on The Homebuyer’s Option to Test for Lead-Based Paint and Lead-Based Paint Hazards</td>
</tr>
<tr>
<td>3. Is receipt of the three items above documented in the project file?</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

#### Evaluation/Inspection

<table>
<thead>
<tr>
<th>Evaluation/Inspection</th>
<th>Yes</th>
<th>No</th>
<th>Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td>If the home is exempt from the Lead Safe Housing Rule, is this documented in the project file?</td>
<td></td>
<td></td>
<td>See Form 5 for Lead Safe Housing Requirements Screening Worksheet</td>
</tr>
<tr>
<td>If the homebuyer receives additional assistance for rehabilitation, are the requirements of Subpart J followed?</td>
<td></td>
<td></td>
<td>See Reference Manual Chapter 4 for guidance on Subpart J</td>
</tr>
<tr>
<td>Does the home inspection include a visual assessment for deteriorated paint?</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>If the potential home is a condominium, does the visual assessment include common areas?</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Is the person performing the inspection trained in visual assessment?</td>
<td></td>
<td></td>
<td>For training on visual assessments, see <a href="http://www.hud.gov/offices/lead/lbptraining">www.hud.gov/offices/lead/lbptraining</a></td>
</tr>
<tr>
<td>Are the visual assessment results documented on the inspection form (HQS or equivalent)?</td>
<td></td>
<td></td>
<td>For sample HQS form, see <a href="http://www.hudclips.org/sub_nonhud/html/pdfforms/52580-a.pdf">http://www.hudclips.org/sub_nonhud/html/pdfforms/52580-a.pdf</a></td>
</tr>
</tbody>
</table>
**Lead Hazard Reduction**

10. If the visual assessment reveals deteriorated paint does paint stabilization occur?  
11. Is the paint stabilization (above the de minimis) conducted by qualified workers using safe work practices?  
12. Do you have procedures to document that work was done by qualified workers using lead safe work practices?  
   See Form 40 for Sample Seller Certification (Homebuyer Program)
13. Is clearance performed after any paint stabilization activity occurs?  
   See Form 22 for Sample Clearance Report  
   See Form 21 for Clearance Review Report Worksheet
14. Is clearance performed by a qualified person?  
15. Does the homebuyer receive a Notice of Lead Hazard Reduction (including clearance results) within 15 days of the completion of the work?  
   See Form 23 for Sample Notice of Lead Hazard Reduction
16. Does approval of the home for occupancy occur after the unit passed clearance?

**Documentation**

17. Have you documented your compliance with all the lead-based paint requirements in the homebuyer file?  
   See Form 38 for Homebuyer Program Lead Compliance Document Checklist
18. Are all documents related to compliance with the lead requirements kept for at least 3 years after closing?
Exercise 6-2: Finding Solutions

You work for the city of Leadville in the Community Development Department. Read each of the following scenarios and think about how you would address each one. Provide answers in space provided.

1. A homebuyers’ program is operated by a nonprofit. They work with a lender, who refers families who have applied for a mortgage and appear to qualify for assistance. The first time the nonprofit sees the family is when they already are trying to buy a specific house.
   a. Given the lead requirements, would you restructure the program?
   b. What information should the nonprofit be providing to lenders and realtors in advance about the Lead Safe Housing Rule to encourage their continued participation?

2. Leadville is in Minnesota. In January, a realtor refers Tom and Susan to you for assistance. They have found a house built in 1950. A visual assessment reveals chipping paint on the exterior and in the second floor bathroom. The Leadville Housing Division’s program recognizes that virtually all houses that come into the program will contain lead-based paint (hence, the name of the town) and does not encourage homebuyers to look for other houses. How do you proceed with this particular house? Remember, it is January in Minnesota.

3. A city council member complains on behalf of one of his elderly constituents who is selling her home to a family getting homebuyer’s assistance. “The family wanted the property tested for lead-based paint. Who’s going to pay for the test?” the councilman asks. “And what if there is lead in the paint? If the property is well maintained, is there a problem?” What do you say?
Exercise 6-2: Finding Solutions Continued

4. During an inspection of a 1950's home being purchased by a young family with down payment assistance, you note the property passes all housing standards, but there is the distinct odor of fresh paint in all the rooms.

   a. Do you investigate why the seller just painted?

   b. What can you tell the homebuyers about ongoing maintenance of their home?

5. Buddy and Barbara want to buy a house built in the thirties that has deteriorated paint in several rooms. The seller is unwilling to pay for the work and Buddy and Barbara already are receiving the maximum down payment allowed under the program. The market for houses in the right price range is very hot. What could you do if you wanted to help the buyers?
Module 7: TBRA Programs

Module Objectives:
At the end of this module, students will be able to:
➢ Describe requirements of the Lead Safe Housing Rule for TBRA programs
➢ Complete a “lead wellness checklist” to assess their own program compliance
➢ Develop and share approaches to addressing common challenges faced by TBRA programs

Module Overview:

| Introduction     | • TBRA requirements—what is required and who can do it?  
|                  | • EIBLL requirements  
|                  | • Ongoing maintenance  
|                  | • Key program activities  
| Exercise 7-1: Lead Wellness | • Participants work directly with their colleagues to assess their own program compliance using the “lead wellness checklist.”  
|                  | • Participants discuss which parts of the checklist were the most challenging  
| Exercise 7-2: Finding Solutions | • Participants will work in groups.  
|                  | • Each group must choose (or be assigned) a challenge identified in the debrief of Exercise 7-1.  
|                  | • They must answer the questions posed by Exercise 7-2 and come up with action steps for addressing their challenge.  
|                  | • They should list their answers on a flipchart so that they can later do a gallery walk.  
| Gallery Walk      | • Participants do a short “Gallery Walk.”  
|                  | • Large group discusses good ideas they saw during the Gallery Walk.  
| Wrap Up          |

## Module 7: TBRA Programs
### List of Useful Resources

<table>
<thead>
<tr>
<th>Resource</th>
<th>Where to Find It</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Lead Safe Housing Requirements Screening Worksheet</td>
<td>Form 5</td>
</tr>
<tr>
<td>2. Sample Instructions for Owners of TBRA Units</td>
<td>Form 41</td>
</tr>
<tr>
<td>3. Sample TBRA Owner Certification</td>
<td>Form 42</td>
</tr>
<tr>
<td>4. Sample Clearance Report</td>
<td>Form 22</td>
</tr>
<tr>
<td>5. Lead Paint Clearance Testing Reimbursement for HOME and CDBG Grantees</td>
<td>Form 50</td>
</tr>
<tr>
<td>6. Clearance Protocol for HUD-Assisted Properties</td>
<td>Form 51</td>
</tr>
<tr>
<td>7. Disclosure Form--Rentals</td>
<td>Form 2</td>
</tr>
<tr>
<td>8. Sample TBRA Resident Instructions</td>
<td>Form 43</td>
</tr>
<tr>
<td>9. Guidance on Relocation</td>
<td>Form 34</td>
</tr>
<tr>
<td>10. Sample Notice of Lead Hazard Reduction</td>
<td>Form 23</td>
</tr>
<tr>
<td>11. TBRA Sample Letters to Health Department</td>
<td>Forms 45 and 46</td>
</tr>
<tr>
<td>12. TBRA Program Lead Compliance Document Checklist</td>
<td>Form 44</td>
</tr>
<tr>
<td>13. Chapter 5: Addressing Lead-Based Paint in TBRA Programs</td>
<td>Reference Manual Chapter 5</td>
</tr>
</tbody>
</table>
Module 7

Tenant Based Rental Assistance (TBRA) Programs

Learning Objectives

• At the end of this module, students will be able to:
  - Describe requirements of the Lead Safe Housing Rule for TBRA programs
  - Complete a "lead wellness checklist" to assess program compliance
  - Develop and share approaches to addressing common TBRA challenges

TBRA Programs Affected

• TBRA Programs Funded by:
  - HOME
  - HOPWA
  - Shelter Plus Care (S+C)
• Other HUD programs that provide TBRA
  - Section 8 of the US Housing Act of 1937
  - Indian Housing Block Grant Program
• Properties
  - Occupied by children under age 6
  - Pre-1978

Reference Manual Chapter 5
TBRA Requirements

<table>
<thead>
<tr>
<th>Approach</th>
<th>Identify and Address Deteriorated Paint</th>
</tr>
</thead>
<tbody>
<tr>
<td>Notification</td>
<td>Yes</td>
</tr>
<tr>
<td>Evaluation</td>
<td>Visual Assessment</td>
</tr>
<tr>
<td>Reduction</td>
<td>Paint Stabilization</td>
</tr>
<tr>
<td></td>
<td>Safe Work Practices and Clearance</td>
</tr>
<tr>
<td>Ongoing Maintenance</td>
<td>Yes</td>
</tr>
<tr>
<td>EIBLL Requirements</td>
<td>Yes</td>
</tr>
</tbody>
</table>

Ongoing Maintenance

- Establish procedures to track and document:
  - New children under age 6
  - Ongoing maintenance to control hazards
  - Periodic inspections (including visual assessment)
  - Inspection findings corrected
- Maintain required records

EIBLL Requirements

- Share and compare data quarterly
- When report of EIBLL child is received:
  - Verify and report to health department
  - Conduct risk assessment and notify occupants
  - Perform interim controls or abatement
  - Conduct clearance

Reference Manual Chapter 5
Key Program Activities: TBRA

- Application
- Unit inspection
- Inspection findings corrected
- Execution of agreement and rental documents
- Ongoing responsibilities

Reference Manual Chapter 5
Exhibit 5-2

Exercise 7-1: Lead Wellness

- Work with your colleagues
- Answer each question for your TBRA program
- See comments column for additional resources
- You have 15 minutes

What are your biggest challenges?
Common Challenges

- Communicating with owners
- Monitoring owner compliance
- Retaining owners in the program
- Meeting notification/recordkeeping requirements
- Meeting ongoing maintenance requirements
- Relocating residents when necessary

Exercise 7-2: Finding Solutions

- Choose the challenge that interests you
- Work in groups
- Discuss the challenge
- Answer the questions in Exercise 7-2
- List your answers on a flipchart
- Be prepared to report out your answers
- You have 15 minutes

Wrap-Up

You now know:

- Lead Safe Housing requirements for TBRA
- Compliance issues in your program
- Steps you can take to facilitate compliance
## TBRA – Exercise 7-1
### Lead Wellness Checklist

Answer the following questions for your program. Note resources listed in “comments” column.

<table>
<thead>
<tr>
<th>Application</th>
<th>Yes</th>
<th>No</th>
<th>Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Does your program application ask for the ages of children expected to reside in the unit?</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Unit Selection/Inspection</th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>2. Do you conduct a visual assessment of all pre-78 units with children under age 6?</td>
<td></td>
<td></td>
<td>See Form 5 for Lead Safe Housing Requirements Screening Worksheet</td>
</tr>
<tr>
<td>3. If the unit is exempt from the lead safe housing rule, is this documented?</td>
<td></td>
<td></td>
<td>For training, see <a href="http://www.hud.gov/offices/lead/lbptraining">www.hud.gov/offices/lead/lbptraining</a></td>
</tr>
<tr>
<td>5. Are the visual assessment results documented on the inspection form (HQS or equivalent)?</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>6. Is the owner clearly instructed to stabilize all deteriorated paint?</td>
<td></td>
<td></td>
<td>See Form 41 for Sample Instructions for Owners of TBRA Units</td>
</tr>
<tr>
<td>7. If the owner refuses to stabilize deteriorated paint, is the unit denied approval?</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>8. Is owner clearly instructed that workers who perform paint stabilization above the de minimis must be qualified (i.e. trained or supervised) and must use lead safe work practices?</td>
<td></td>
<td></td>
<td>See Form 41 for Sample Instructions for Owners of TBRA Units</td>
</tr>
<tr>
<td>9. Do you have procedures to document that work was done by qualified workers using lead safe work practices?</td>
<td></td>
<td></td>
<td>See Form 19 for Post Construction Safe Work Certification</td>
</tr>
<tr>
<td>10. Is clearance performed in all units where paint stabilization on areas above the de minimis occurred?</td>
<td></td>
<td></td>
<td>See Form 42 for Sample TBRA Owner Certification</td>
</tr>
<tr>
<td>11. Are all clearance reports evaluated to ensure that no deteriorated paint or lead contaminated dust was found?</td>
<td></td>
<td></td>
<td>See Form 21 for Clearance Report Review Worksheet</td>
</tr>
<tr>
<td>12. Does approval of the unit for occupancy occur after the unit passed clearance?</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Rental Documents/Payments</th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>13. When a resident signs the lease, does he/she receive a copy of the pamphlet and a disclosure form?</td>
<td></td>
<td></td>
<td>See Form 2 for Disclosure Form-Rentals. This form also documents the receipt of the pamphlet</td>
</tr>
<tr>
<td>14. Are residents instructed to report any deteriorated paint or damage to painted surfaces?</td>
<td></td>
<td></td>
<td>See Form 43 for Sample TBRA Resident Instructions</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>---</td>
<td>---</td>
<td>---</td>
<td></td>
</tr>
<tr>
<td>15. If recertification shows a child under six in a TBRA unit where there was none before, do you:</td>
<td></td>
<td>See Reference Manual Chapter 5 for requirements</td>
<td></td>
</tr>
<tr>
<td>→ Conduct a visual assessment?</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>→ Conduct paint stabilization on deteriorated paint?</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>→ Make repairs using safe work practices?</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>→ Use properly trained or supervised workers?</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>→ Perform clearance?</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>→ Provide a notice of lead hazard reduction to residents?</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Ongoing Maintenance</th>
</tr>
</thead>
<tbody>
<tr>
<td>16. Have owners been instructed to perform ongoing maintenance?</td>
</tr>
</tbody>
</table>

<p>| | | |</p>
<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>17. Does the agency perform annual visual assessments?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>18. If a visual assessment reveals deteriorated paint, is the owner instructed to perform paint stabilization (using safe work practices)?</td>
<td>See Form 41 for Sample Instructions for Owners of TBRA Units</td>
<td></td>
</tr>
<tr>
<td>19. Does the agency have a relocation policy for addressing situations where residents must leave the unit while ongoing maintenance work is performed?</td>
<td>See Form 34 for Guidance on Relocation</td>
<td></td>
</tr>
<tr>
<td>20. Is clearance performed after ongoing maintenance activities that involve paint stabilization on surfaces above the de minimis?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>21. Does the agency retain clearance reports following all ongoing maintenance activities documenting that the unit passed clearance?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>22. Does the owner provide a notice of lead hazard reduction after ongoing maintenance disturbs painted surfaces?</td>
<td>See Form 23 for Sample Notice of Lead Hazard Reduction</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Environmental Intervention Blood Lead Levels</th>
</tr>
</thead>
<tbody>
<tr>
<td>23. Do you have procedures in place to share data quarterly on poisoned children with the local health department?</td>
</tr>
<tr>
<td>24. When a poisoned child is identified in a TBRA unit, do you have procedures in place to ensure that a risk assessment and lead hazard control activities are done?</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Documentation</th>
</tr>
</thead>
<tbody>
<tr>
<td>25. Have you documented your compliance with all the lead-based paint requirements in the tenant file?</td>
</tr>
<tr>
<td>26. Are all documents related to compliance with the lead requirements kept for at least 3 years?</td>
</tr>
</tbody>
</table>
Exercise 7-2: Finding Solutions

Consider the challenge you have been presented. For this challenge, answer the following questions. Be as precise as possible.

Be prepared to share your answers with the group. Jot down your answers in the space below. Then transfer them to a flipchart – write in a large, legible format that will allow others to read it and understand your ideas.

1. Who needs to be involved in the solution to this challenge?


3. Where can you find these resources?

4. What are the first four action steps you will take?
Module 8: Special Needs Housing Programs

Module Objectives:
Students will be able to:
- Describe requirements of Lead Safe Housing Rule for Special Needs programs
- Determine the applicable subpart of the rule for a given Special Needs activity
- Identify the first steps to take in implementing the Lead Safe Housing Rule in local Special Needs programs

Module Overview:

| Introduction | • Programs affected  
|             | • Key actors  
|             | • Requirements  
| Exercise 8-1: How is This Project Affected? | • The exercise consists of scenarios. Participants must make a judgment about whether the particular scenario is exempt from the rule or not. If not exempt, the group must identify the applicable subpart (J, K, or M)  
|             | • Participants post their answers onto a flipchart.  
|             | • Discussion of correct answers.  
| Sharing Experiences | • Participants discuss a series of questions on their experiences – the people involved in the process, the requirements, etc.  
| Wrap-up |   

# Module 8: Special Needs
## List of Useful Resources

<table>
<thead>
<tr>
<th>Resource</th>
<th>Where to Find It</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Sample Instructions for Nonprofits</td>
<td>Form 47</td>
</tr>
<tr>
<td>2. Sample Owner Certification for Special Needs Project</td>
<td>Form 48</td>
</tr>
<tr>
<td>3. Special Needs Program Compliance File Checklist</td>
<td>Form 49</td>
</tr>
<tr>
<td>4. Disclosure Form—Rentals</td>
<td>Form 2</td>
</tr>
<tr>
<td>5. Lead Safe Housing Requirements Screening Worksheet</td>
<td>Form 5</td>
</tr>
<tr>
<td>6. Sample Notice of Lead Hazard Reduction</td>
<td>Form 23</td>
</tr>
<tr>
<td>7. Clearance Report Review Worksheet</td>
<td>Form 21</td>
</tr>
<tr>
<td>8. Lead Paint Clearance Testing Reimbursement for HOME and CDBG Grantees</td>
<td>Form 50</td>
</tr>
<tr>
<td>9. Clearance Protocol for HUD-Assisted Properties</td>
<td>Form 51</td>
</tr>
<tr>
<td>10. <strong>Chapter 7: Addressing Lead-Based Paint in Special Needs Housing Programs</strong></td>
<td>Reference Manual Chapter 7</td>
</tr>
</tbody>
</table>
Module 8: Special Needs Programs

Learning Objectives

At the end of this module, students will be able to:
- Describe requirements of the Lead Safe Housing Rule for special needs programs
- Determine if funded activities are exempt or what subpart is applicable
- Identify first steps towards lead compliance

Programs Affected

- Special Needs Programs Funded by:
  - HOME, CDBG, HOPWA, SHP, S+C, ESG
- Programs may include:
  - Acquisition or leasing of residential property
  - Support services and operations
  - Rehabilitation
  - Tenant Based Rental Assistance

See Reference Manual Chapter 7
Key Actors

- Grantees
  - State, city and county governments
- Administering agencies
  - City and county governments
  - Nonprofit agencies
- Program participants:
  - Occupants
  - Property Owners

Special Needs Housing

Requirements

- May be subject to:
  - Subpart J: Rehab
  - Subpart K: Acquisition, Leasing, Support Services, and Operations
  - Subpart M: TBRA
- Often exempt

See Reference Manual Chapter 7, Attachment 7-A

Exercise 8-1:

How is this project affected?

- Read the scenario(s) assigned to your group
- Decide if exempt or non-exempt
- If non-exempt, determine subpart applicable
- Record on flipchart
- Be prepared to explain your answer
- You have 5 minutes
Discussion: Sharing Experiences

- Who is involved in implementing special needs programs?
- What are the challenges?
- How do you ensure compliance?

Wrap-Up

You now know how to:
- Determine if a project is affected
- Determine which requirements apply
- Adjust program procedures to comply
**Special Needs Housing—Exercise 8-1**  
**How is this project affected?**

1. Read the scenario(s) assigned to your group.  
2. Decide if they are exempt or non exempt. Record the answer on your worksheet.  
3. Discuss with your group the reasons why it is exempt or nonexempt. Record the answer on your worksheet.  
4. If it is not exempt, determine the subpart (J, K, or M) that applies. Record the answer on your worksheet.  
5. Go to the flipchart at the front of the room. Put the letter for your scenario in the correct column (exempt or non-exempt).  
6. Be prepared to explain your answer to the large group.  
7. If you finish early, try answering some of the other scenarios.

<table>
<thead>
<tr>
<th>Scenarios</th>
<th>Exempt or Non-exempt?</th>
<th>Explanation (Subpart J, K, or M?)</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>A</strong> A housing developer seeks funding to acquire and rehabilitate a large 15-room home that will house 12 mentally ill individuals. The developer is planning to use Supportive Housing Program funds in conjunction with HOME funds.</td>
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<td><strong>B</strong> Helping Hands, Inc. provides a homeless shelter to single mothers with children. Each family occupies a two-bedroom unit. The shelter typically places families into permanent housing within 90 days, but immediately fills the unit with another family. Emergency Shelter Grant program funding is used for operations, leasing and supportive services.</td>
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<td><strong>C</strong> A 20-unit property for formerly homeless veterans is being acquired and rehabilitated in the town of Chippewa Falls. The units are all single room occupancy dwellings with kitchen and bathroom facilities.</td>
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<td><strong>D</strong> A town in the Northeast determines that one reason why the homeless population has been increasing is due to escalating costs for security deposits, sometimes 2-3 months of funds are needed upfront. The jurisdiction would like to fund the new program with their HOME funds.</td>
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### Scenarios

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<td><strong>E</strong></td>
<td>The county’s main provider of social services for those with HIV and AIDS is funded each year under the Community Development Block Grant program for their “mobile outreach program.” This program provides for mobile services such as medical care, nutrition services, and “meals on wheels.”</td>
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<td><strong>F</strong></td>
<td>A nonprofit has applied for HOME funds to acquire and convert a warehouse into transitional housing comprised of 2-bedroom units for families.</td>
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<td><strong>G</strong></td>
<td>A local community action agency provides housing counseling to clients who are homeless or living in transitional housing, because they need permanent housing. Community Development Block Grant funds make up the bulk of the budget for this program.</td>
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<td><strong>H</strong></td>
<td>A church sponsored community development corporation is looking to find shelter space for a “safe haven” for chronic inebriates and other hard to serve homeless populations. The building they are looking to acquire with Supportive Housing Program funds is an old gymnasium at a closed prep school. The church plans to provide nightly meals and beds in the gymnasium.</td>
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<td>The County’s Continuum of Care application process is underway and a request for proposals is advertised for projects. In response to the RFP, The Salvation Army is seeking funds for operations and supportive service components for a transitional housing development for single individuals. The housing will consist of 1-bedroom units with an eat-in kitchen. Supportive services include GED classes, computer learning skills, job-readiness, and home-budgeting classes.</td>
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<td>Assisted Living, Inc. is rehabilitating a 45-unit development for the elderly in the Williamstown neighborhood using HOME and Section 202 funds. The development will include 1-bedroom units and efficiencies along with supportive services for residents.</td>
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<td>The City of Westview runs a homeless prevention program using CDBG funds. The program provides emergency rental payments for up to three consecutive months for families who can't pay their rent and are at-risk of becoming homeless.</td>
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<td>The Food and Shelter Foundation in Frozen Lake, Michigan uses ESG funds to rent rooms in the local motel to provide shelter to homeless families during the coldest months of the year. Because the temperature can be below freezing from October through March in Frozen Lake, these rooms are often rented continuously for 6 months.</td>
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OPTIONAL Exercise 8-2: Applying the Lead Safe Housing Rule to a Special Needs Program

Use the scenario below or use your own program to answer the questions below.

Scenarios:

The Allentown Community Action Agency (CAA) is the primary provider of homeless housing and services for Allen County. Under its Families Forward Program, the CAA acquires buildings and provides supportive services for families living in a transitional living environment. Families Forward is a holistic program that provides both housing units as well as supportive services such as GED classes, drug and alcohol abuse counseling, child care, after-school care, and job readiness. While the program is administered by CAA staff, the housing units are managed by a private sector firm, Managers R Us, who have extensive experience in maintenance. Funding for Families Forward has typically come from large national organizations such as the United Way as well as from foundations. Under Allentown’s Continuum of Care application in 2001, Families Forward was awarded Supportive Housing Program (SHP) funds for operations and supportive services. This is the first time that this program has received Federal Funds.

1. Which subpart of the Lead Safe Housing Regulation applies to this program (Subpart J, K, or M?)

2. List the actors involved in this program.

3. What needs to be done immediately to comply with the Lead Safe Housing Rule?

4. What needs to be done on an ongoing basis?

5. Who is responsible for the activities listed above:
Learning Objectives

At the end of this module, students will be able to:
- List the first ten steps they will take when they get home
- See the glass half full
- Take the message back home

You’ve learned a lot . . .

- What was the best idea you heard?
You’ve collected resources.

• What tools are most useful?
• What will you use when you get home?

Now, take the message home

• Who will you meet with back home?

Meeting Agenda

• Program procedures
• Program design
• Training needs
• Outreach needs
• Resources available
• Impact on production
An Action Plan

What are the first 10 things you will do when you get home?

1. 
2. 
3. 
4. 
5. 
6. 
7. 
8. 
9. 
10.

Housing History

• Gas heat
• Indoor plumbing
• Electricity
• Smoke detectors
• Lead-safe housing

Wrap-Up

• Know what is in the rule – 24 CFR 35
• Use your resources
  - Student Manual
  - Sample Forms
  - HUD
  - Local agencies and Lead Grantees
• Take this message home