

U.S. Department of Housing and Urban Development (HUD)
Office of Healthy Homes and Lead Hazard Control (OHHLHC)

FY13 Grantee Program Managers School

Laying the Foundation and Putting It All Together





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POP QUIZ

- What is the first thing on your to do list when starting a lead inspection?



ANSWER



To Test or not To Test

That is **NOT** the Question

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Chapter 7 Lead Based Paint Inspection

Emphasizes that results and LBP inspection / RA reports using an XRF without a current Performance Characteristic Sheet are invalid

Updates recommended report summary paragraphs on disclosing where LBP was, and was not, identified



HOW TO DO IT



HOW TO DO IT

1. Obtain a current PCS sheet for your XRF
2. Establish a routine
3. Conduct Visual Assessment
4. Draw a site plan



HOW TO DO IT

POP QUIZ

How many calibrations shots should you take before you begin testing?

How often should you recalibrate during testing?



HOW TO DO IT

ANSWER



HOW TO DO IT

5. Identify Testing Combinations
6. Test All Components per Guidelines and Program Policy
7. Collect Dust Samples
8. Collect Soil Samples



HOW TO DO IT

POP QUIZ

When testing a single family house, what do you do when an XRF result shows inconclusive?



HOW TO DO IT

ANSWER

Follow up question: Why do you not use the same process for multi-family properties?



HOW TO DO IT

ANSWER



HOW TO DO IT

8. Take pictures
 - Exterior and interior spaces
 - All untested windows and other untested components
9. Download Test Results from the XRF
10. Write the Inspection Report



HOW TO DO IT

The inspector will prepare an inspection report indicating if and where lead-based paint is located in the unit or the housing development (or building).

Inspection reports contain detailed information on the following:

- ◆ Who performed the inspection;
- ◆ Date(s);
- ◆ Inspector's certification number;
- ◆ All XRF readings;
- ◆ Classification of all surfaces into positive or negative (but not inconclusive) categories, based on XRF and laboratory analyses;
- ◆ Specific information on the XRF and laboratory methodologies;
- ◆ Housing unit and sampling location identifiers;
- ◆ Results of any laboratory analyses.



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LIRA FAQ SHEET

- All Inspectors and Assessors **MUST** be **certified**.
- Must possess a **current PCS** for your XRF.
- Must conduct a **Visual Assessment** prior to testing.
- Must include a **site plan**.
- Must test at **least 1 window per room**, more if windows change in any way.
- The entire **exterior of a house** is NOT a room equivalent.
- Must take **pictures of windows** - Pictures **MUST** be clear and show window condition.
- Must take **pictures of interior and exterior spaces**.
- Must take **soil samples** if bare dirt exists within the drip line or in a child's play area.
- Must take dust wipes
- **DOCUMENT, DOCUMENT, DOCUMENT**

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Chapter 5 Risk Assessments for OHHLHC Grantees

- Purpose
- Required Activities
- Required Documentation- **LI and RA REPORT**
 - Required Elements
 - Who receives it to use, How it is used, When is it used
- How to avoid incomplete and invalid LI/RA Reports
- **PGI-2013-01**
- Templates



Chapter 5 Risk Assessments for OHHLHC Grantees

- Purpose:
 - Determine the existence, nature, severity, and location of lead based paint hazards in or on a residential property and for reporting the findings of the assessment and the options for controlling or abating the hazards that are found
 - HUD Guidelines Chapter 5-9
http://portal.hud.gov/hudportal/documents/huddoc?id=ch05_12-13-12.pdf

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FULL Lead Inspection AND Risk Assessment is required for:

ALL LHRD, LHC and HH Grants:

- Every owner occupied single family residence
- Every rental occupied single family residence
- Every vacant/rental single family residence
- Every multifamily dwelling of 4 or less attached/detached residential units
- Every multifamily dwelling of 5 or more must use the sampling method for FULL assessments as stated in:
 - Chapter 5 of HUD Guidelines:
 - Page 5-64



Why are OHHLHC Grant requirements for LI/RA different from other HUD programs?

- Intent and mission is to remove lead based paint hazards
- Require a *Full LI AND RA*
 - *NO Partial, Screens, EBL, OR LI only/RA only*
- **NO ASSUMPTIONS!**
- Specific purpose of OHHLHC Lead funds
 - Identify and remediate ALL Lead Based Paint Hazards
 - Not Rehab – Not Code Compliance – Not Home Improvement

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Chapter 5 Risk Assessments for OHHLHC Grantees

- Required Activities
- Data Collection
 - Questionnaires/Interview with the occupants
 - Floor Plan and Site Plan Sketches
 - Building Condition Inspection FORM5.1
 - Visual Assessment
 - Dust Sampling
 - Paint Testing- Covered in Lead Inspection
 - Soil Sampling
- Interpretation of results
- Reporting



Required Activities for RA

- **Data Collection**

- **Questionnaire Form 5.0**

- http://portal.hud.gov/hudportal/documents/huddoc?id=cho5_12-13-12.pdf
 - *Identifies patterns of use for the unit, additional sources of lead coming into home that may impact results, history of blood lead for children under 6 to consider.*



Required Activities for RA

- Data Collection
 - ***Floor Plan***-Inside of unit
 - Each unit
 - Labeled with each room, space, and walls Required
 - Recommended: #Windows, Dust Sample Sites
 - Be consistent with labeling on all forms from XRF testing, sketch, recommendations and scope

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Required Activities for RA

- Data Collection
 - ***Site Sketch***- Outside of unit
 - Shows outline of property, building, other structures including fences, driveways and adjacent streets.
 - DIRECTIONAL ARROWS (N,S,E,W)
 - Locations of exterior deteriorated paint, bare soil
 - Exterior sampling for soil and paint

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Required Activities for RA

- **Building Condition Inspection FORM 5.1**
 - Record all findings on Form 5.1
 - Meets EPA (40 CFR 745.227 (c) and (d)
 - NOT the same or equivalent to visual assessment

5-20



Required Activities for RA

- **Visual Assessment**

- Locate lead based paint hazards both exterior and interior
 - All rooms
 - Common Areas- Adjacent to sampled units
 - Common Areas- Likely <6 old come in contact with
 - Complete inventory of location & approximate size of each instance of:
 - Deteriorated substrate conditions
 - Bare Soil

5-(19-22)



Required Activities for RA

- **Documentation of Visual Assessment Findings**
 - Side and Wall identification
 - Side of structure with letters
 - Side A street side, Multi family Side A Main Entry
 - Room equivalent Identification
 - Both a number and its use
 - Room 5, Kitchen
 - Page 38- Spaces considered rooms: Hallways, stairways, entry rooms, lobbies, bedroom bathrooms living rooms, kitchens, ect
 - Sides in a room
 - Designated Clockwise
 - If facing side C than side A at your back
 - Component identification- *Table 5.4 resource*
 - Window, Room 1, Side C, #1
- 5-23



Required Activities for RA

- **VISUAL ASSESSMENT DOCUMENTATION**
- Only two responses to document for OHHLHC!
 - **Intact**
 - **Deteriorated**
 - **IF XRF Test for LBP is >Action Level= ELIGIBLE**

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Required Activities for RA

- **Dust Sampling**

- Must be collected in all living areas where young children are most likely to come into contact with dust (40CFR 745.227 (d)(5)
 - Sill and Floor from each of such rooms
- Figure 5.15 Page 5-43 Resource
- NO MIN, NO MAX- Must be a representative Sample per the RA judgment

- **NO TROUGHS-CLEARANCE ONLY**

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Required Activities for RA

- **Paint Testing**

- **MUST HAVE XRF TESTING OF ALL PAINTED COMPONENTS**
 - **May do room equivalents if documented as required**
- **NO Exceptions, NO instances in which XRF testing is not required in an OHHLHC unit**
- *Details Reviewed the Lead Inspection Slides*



Chapter 5 Risk Assessments for OHHLHC Grantees

- Required Documentation- **LIRA REPORT**
 - Required Elements
 - Who receives it to use, How it is used, When is it used
 - What is not to be included in the REPORT



LIRA REPORT

- **Required Elements**

Summarize these elements into the required format sections:

- Site Specific Hazard Control Options
- Cost and Feasibility
- Reevaluation Recommendation
- Recommendation to Owners When No Hazards Are Identified
- *Some may be repeated more than once*



LIRA REPORT

- Required Elements
 - **Report Format**
 - Executive Summary
 - Table of Contents
 - Identifying Information and RA Signature (**EPA REQUIRED**)
 - Purpose of THIS Risk Assessment
 - Definitions
 - Description of LBP Hazards and Acceptable Hazard Control Options (**EPA- Required**)
 - Recommendations for Maintenance for Management (**EPA- Required**)
 - Supporting Information (**EPA- Required**)



LIRA REPORT

- **Who receives it to use & How**
- Homeowner
 - Guide of how to make home lead safe, disclosure tool for future owner, occupants
- Occupant
 - Risk of unit they are living in summarized, options for safe removal and management of the findings
- Lead Regulating Agency
 - Official documentation of lead found for this unit, at this time, by whom. REPORTING of Lead Burden, Monitoring of Housing Stock, Disclosure for Public Record

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LIRA REPORT

- **Who receives it to use & How**
- OHHLHC Grant Program
 - Determines eligibility of units if any LBP Hazards are identified
 - Provides blueprint and justification for scope of work
 - Provides justification documentation for any components included that was not identified as a LBP Hazard:
 - Supporting structural
 - Room Equivalent Testing



LIRA REPORT

- **Who receives it to use & How**
- **OHHLHC GTR & OIG**
 - Use the LIRA to establish eligible cost of all scoped items
 - Validation of LIRA
 - Time
 - All required Components per strictest standard in your jurisdiction
 - 40 CFR, HUD Guideline, State Regs, PG, NOFA

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LIRA REPORT

- **What is not to be included in the REPORT**
 - Any health or personal information not related to the unit patten of use
 - Name of EBL or children living in the home but included in questionnaire
 - Scope of Work (should be developed based on the LI and RA report!)
 - Tubs and Tile



How to avoid incomplete and invalid LIRA Reports

- Validation of LIRA
 - Time
 - 6month to 1 year *Recommend Reevaluation before contract*
 - 1 year and 1 day = **INVALID, Unit if contracted is ineligible in whole for reimbursement.**
 - 24 CFR 35.165(b)(1)
 - All required Components in the final filed report; that reflect compliance of activities completed per strictest standard in your jurisdiction
 - 40 CFR, HUD Guideline, State Regs, PG, NOFA



Chapter 5 Risk Assessments for OHHLHC Grantees

- Templates
 - Provide to Sub and Contractor to guide compliance
 - Optional but beneficial
 - Located in Tab



MYTH BUSTERS!

- *Friction & Impact- Indicate a LBP Hazard that makes those components eligible for LHC funds provided by OHHLHC in whole – FALSE*
 - *These terms describe a **potential hazard** based on the patterns of use of the unit.*
 - *If these components are not confirmed by a positive lead dust sample **and** are also LBP + for the component by XRF, they **are not currently hazards** and are **not eligible**.*
 - *ROOM EQUIVALENCY*
 - *Must be defined and identified in the report 5-(30-32)*

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MYTH BUSTERS!

- Chewable Surface
- **ALL APPLY FOR FRICTION AND IMPACT**
 - Optional for treatment
 - If yes, than must have thorough documentation of the location and justification for repair
 - Must Comply with EPA
 - Must be soft surface
 - If child not present in the home are not hazardous
 - NO VACANT UNITS

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PGI-2013-01

- **Requirements**
- **Documentation**
- **What does it mean for grant programs**



ACTIVITY

- Which one of answer below is a required element of a LIRA Report according to the HUD GUIDELINES 2012
 - Visual Inspection of all surface coating in the unit
 - Risk Assessor Signature
 - Material Safety Data Sheet
 - ALL lab and sample results
 - Summary of Hazards found with recommendations for LHC



Activity

- Which answer below is not a required element of a LIRA? IS there more than one?
 - Questionnaire/survey of occupants
 - Building Component Survey
 - Floor Plan Sketch
 - OHHLHC Grant Program Scope of Work
 - Site Sketch
 - Requirement for Disclosure Statement

