

## Chapter 2: Where To Go For Help – Qualifications, Roles and Resources

|  |      |
|--|------|
| I. Introduction .....  | 2-3  |
| II. Housing .....  | 2-3  |
| A. Owners .....  | 2-3  |
| B. Residents .....   | 2-5  |
| C. Property or Project Managers .....  | 2-6  |
| D. Architects/Engineers/Rehabilitation Specialists .....   | 2-6  |
| E. Housing and Code Inspectors .....   | 2-7  |
| F. Lead Hazard Control Supervisors and Workers .....   | 2-8  |
| 1. Abatement.....  | 2-8  |
| 2. Interim Controls .....  | 2-9  |
| G. Public Housing Authorities, Tribally-Designated Housing Entities<br>and Other Housing Agencies .....                                      | 2-9  |
| H. Insurance Companies .....   | 2-9  |
| I. Real Estate Brokers and Agents .....  | 2-9  |
| III. Health .....  | 2-10 |
| A. Public Health .....   | 2-10 |
| B. Health Care Providers .....   | 2-11 |
| C. Public Health Practitioners .....   | 2-12 |
| D. Public Health Departments .....   | 2-12 |
| IV. Environment .....  | 2-13 |
| A. Risk Assessors, Inspectors, Sampling Technicians .....  | 2-13 |
| 1. Risk Assessors .....  | 2-13 |
| 2. Inspectors .....  | 2-14 |
| 3. Sampling Technicians.....   | 2-15 |
| 4. Finding Qualified Risk Assessors and Inspectors .....   | 2-15 |
| B. Waste Managers and Environmental Protection Departments .....   | 2-16 |
| C. Other Environmental Consultants .....   | 2-17 |
| D. Suppliers .....   | 2-18 |
| E. Laboratories .....  | 2-19 |
| F. Training Providers .....  | 2-20 |
| REFERENCE.....   | 2-21 |
| FIGURES  |      |
| Figure 2.1 Many local health departments distribute information or conduct outreach<br>activities at health fairs or community meetings..... | 2-10 |



**Figure 2.2** Risk assessors and property owners planning housing rehabilitation may find an on-site meeting facilitates communication about lead-based paint hazards on a property. .... 2-14

**TABLE**

**Table 2.1** Owner Responsibilities ..... 2-4

# Chapter 2: Where To Go For Help – Qualifications, Roles and Resources

## I. Introduction

No single discipline or profession is responsible for lead poisoning prevention, which involves housing, public health, and environmental dimensions. This chapter provides information on:

- ◆ Required expertise and qualifications.
- ◆ Sources of assistance for residents or owners.
- ◆ Coordination of work among the various professions.

## II. Housing

Because lead-based paint hazards are almost always linked to the condition of the dwelling, housing design professionals, housing or building departments, housing contractors, and property owners are well-positioned to complete and maintain any necessary repairs or improvements in the home environment. Ultimately, owners are responsible for authorizing and financing the work. Although public health and environmental agencies may occasionally exert primary or temporary influence over a dwelling, the role of housing professionals is usually predominant. This section outlines the primary roles, responsibilities and typical qualifications of the primary players in housing and lead hazard evaluation and control.

### A. Owners

Property owners have the primary responsibility for identifying and correcting lead-based paint hazards, since they control the dwelling. Owners' responsibilities are listed in Table 2.1 and are distinct from the responsibilities of residents, unless, of course, they are owner-occupants. While owners may choose to delegate authority for lead hazard control projects to project managers, property management companies, environmental consultants, design professionals, or others, they are ultimately responsible for the successful completion of the project. A lead risk assessor or inspector can provide important advice and/or data; however, owners make the final decision regarding the choice of the appropriate lead hazard control treatment. Owners may choose to implement treatments during the vacancy, renovation, or sale of the dwelling (see Chapter 3). Owners are also responsible for ensuring that routine maintenance work is performed safely to prevent the creation of leaded dust hazards. For instance, special cleanup measures may be required for many maintenance jobs that previously involved only a broom sweep. Owners are responsible for obtaining a clearance examination when required. Finally, owners are responsible for determining how projects are to be financed, filling out grant or loan applications (if they are available in the jurisdiction), and making sure that the project goes smoothly. Public housing authorities have found that a periodic onsite appearance by the owner or owner's representative clearly reinforces the importance of the work being done.

*How can owners make certain that abatement or interim control work is done properly?*

Under Title X, all abatement and renovation work (which includes interim control work as well as a range of other activities; see the Glossary) in target housing must be performed by certified firms, certified supervisors, and trained and, as appropriate, certified workers. The owner of target housing has responsibilities under the Lead Disclosure Rule as well (see Section II.I of this chapter, and Appendix 6).

### **Table 2.1     Owner Responsibilities**

- ◆ Administering the overall project.
- ◆ Acquiring the necessary services from certified risk assessors, inspector, lead hazard control contractors, clearance examiners, trained (and, as required, certified) workers and planners, as appropriate for the project.
- ◆ Providing access to areas to be evaluated or controlled.
- ◆ Selecting and approving lead hazard control measures, with input from risk assessors and others.
- ◆ Revising, as needed, and ensuring implementation of routine maintenance work practices to prevent lead hazards from being generated.
- ◆ Lead disclosure (See Appendix 6): Providing information on lead poisoning, and on the presence of lead-based paint and lead-based paint hazards in the housing, to prospective residents and purchasers.
- ◆ Monitoring conditions to ensure that lead-based paint hazards do not recur and ensuring that periodic reevaluation is performed by a certified inspector or certified risk assessor.
- ◆ Obtaining waste permits, manifests, etc.
- ◆ Financing lead hazard evaluation and control and other aspects of the overall project.

The following landlord associations provide information to their members on owner responsibilities:

Council of Large Public Housing Authorities  
 1250 Eye Street, NW, Suite 901  
 Washington, DC 20005-3947  
 (202) 638-1300  
[www.clpha.org](http://www.clpha.org)

Public Housing Authorities Directors Association  
 511 Capitol Court NE  
 Washington, DC 20002-4937  
 (202) 546-5445  
[www.phada.org](http://www.phada.org)

National Apartment Association  
 201 N. Union Street, Suite 200  
 Alexandria, VA 22314-2642  
 (703) 518-6141  
[www.naahq.org](http://www.naahq.org)

National Association of Housing and Redevelopment Officials  
 630 Eye Street NW  
 Washington, DC 20001-3736  
 (877) 866-2476 or (202) 289-3500  
[www.nahro.org](http://www.nahro.org)

National Multi-Housing Council  
 1850 M Street NW, Suite 540  
 Washington, DC 20036-5803  
 (202) 974-2300  
[www.nmhc.org](http://www.nmhc.org)

## B. Residents

If residents are also owners, their responsibilities are the same as those outlined in the section above. If residents are renters, they typically have certain shared responsibilities with the owners in reducing the risk of lead poisoning in children. Generally, owners are responsible for providing properties that are lead-safe and surfaces that are cleanable. Residents are responsible for performing ordinary household cleaning of those surfaces, particularly floors and exterior and interior window sills. If a potential lead hazard develops (e.g., peeling paint), the resident should report it to the landlord. The Centers for Disease Control and Prevention (CDC) recommends that parents have their young children screened for lead poisoning by no later than 12 months of age, either by their pediatrician or the local health department. This service may be provided at no charge to the parent, depending on the availability of local and/or private funding.

The many sources of public information on lead poisoning include:

National Lead Information Center and Document Clearinghouse, 800-424-LEAD (5323) Hearing- or speech-challenged individuals may access this number through TTY by calling the toll-free Federal

Relay Service at 800-877-8339. The Clearinghouse provides technical assistance by phone to the general public and professionals. It provides many materials, including both Federal lead hazard information pamphlets:

- ◆ *Protect Your Family from Lead in Your Home*, which is available in several languages, including English, Spanish, Vietnamese, Russian, Arabic, Somali; in various graphic formats.)
- ◆ *Renovate Right: Important Lead Hazard Information for Families, Child Care Providers, and Schools*, which is available in English and Spanish.

The Clearinghouse has a document request form on line at <http://www.epa.gov/oppt/lead/pubs/nlic.htm>.

Centers for Disease Control and Prevention’s Healthy Homes and Lead Poisoning Prevention Branch

EPA Regional Offices (see Appendix 3)

Occupational Safety and Health Administration (OSHA) Regional Offices (see Appendix 4)

Local Health Departments

Local Poison Control Centers 800 number

Local Public Housing Authorities or Tribally-Designated Housing Entities (TDHEs)

Local Housing and Community Development Agencies

HUD Office of Healthy Homes and Lead Hazard Control, (202) 755-1785, Ext. 7698,  
<http://www.hud.gov/offices/lead>

### C. Property or Project Managers

Property managers and management companies may sometimes act as the owner’s designated representative on lead-based paint issues, in which case they assume the owner’s responsibilities described above. These individuals are responsible for acquiring the expertise needed to properly handle potential lead hazards by sending staff members to appropriate training programs or by contracting for services with certified risk assessors, certified inspector, or certified abatement project supervisors.

Real estate agents are often hired by property managers and management companies to handle the sale or lease of housing. These agents assume specific responsibilities under the Lead Disclosure Rule (see Appendix 6).

### D. Architects/Engineers/Rehabilitation Specialists

When planning lead hazard control activities in multiple dwellings, an owner may employ architects, engineers, rehabilitation specialists, or other specialists in housing construction. All of these specialists may be considered “planners” (as the term is used in Title X). Title X requires that planners receive training, since most architects, engineers, and rehabilitation specialists do not currently understand the differences between lead hazard control, asbestos hazard control, and ordinary construction work.

Whether or not they are trained and certified as planners, housing specialists should consult a certified risk assessor, certified abatement project supervisor or project designer to acquire this expertise on the planning team. If job specifications are developed, they should be reviewed by a certified risk assessor; if no risk assessor is available, a qualified environmental or health scientist should be consulted. A certified individual may be required in some programs and jurisdictions.

Planning for housing rehabilitation without taking lead hazard control into account can greatly increase the cost of the overall effort. For many small-scale projects (e.g., single-family homes or projects with less than five units), retaining an architect, engineer, or housing rehabilitation specialist may not be feasible or necessary. In this case, a certified abatement contractor or supervisor may need to consult directly with a certified risk assessor and the owner.

Collaboration should occur between the owner and persons knowledgeable about lead hazard control work and construction. Ideally an owner should seek guidance from a risk assessor who has demonstrated knowledge about both construction and lead hazard control. However, often a team effort will be required, with contractors providing expertise on construction, and risk assessors providing information on identifying and controlling lead hazards.

Lists of housing professionals are available from:

American Institute of Architects  
1735 New York Avenue NW.  
Washington, DC 20006-5292  
(800) AIA-3837 or (202) 626-7300  
[www.aia.org](http://www.aia.org)

National Society of Professional Engineers  
1420 King Street  
Alexandria, VA 22314-2794  
(703) 684-2800  
[www.nspe.org](http://www.nspe.org)

American Council of Engineering Companies (formerly American Consulting Engineers Council)  
1015 15th Street NW, Suite 802  
Washington, DC 20005-2605  
(202) 347-7474  
[www.acec.org](http://www.acec.org)

## **E. Housing and Code Inspectors**

In many jurisdictions some kinds of lead hazards (such as peeling paint) may be identified in the course of ordinary housing or building code inspections. However, most housing and building inspectors do not currently have the training to recognize all kinds of lead hazards (e.g., leaded dust hazards). Individuals engaging in identification of lead-based paint hazards should be certified or licensed by their State or local approving authority as a lead-based paint risk assessor or inspector.

Some states, tribes and localities have laws, regulations and/or codes that cover the presence of lead-based paint. These regulations may consider whether lead-based paint hazards are present, whether young children reside in the housing, and/or whether the housing is rented or owner-occupied.

Some local jurisdictions have courts that focus on housing, or even only lead-based paint, issues.

## F. Lead Hazard Control Supervisors and Workers

### 1. Abatement

Because lead abatement projects are dangerous, they must, by federal (EPA), state and/or tribal law and regulation, be conducted by certified abatement firms, managed by certified abatement supervisors and performed by certified abatement workers. (See Chapter 12 and Appendix 6.) Lead abatement firms should consider employing or having subcontracts with professionals with construction and/or general carpentry or building renovation experience, in addition to environmental experience. These firms should also carry general liability insurance, workers' compensation, and other insurance. Some owners may require bid, performance, and payment bonding and hazardous pollutant insurance coverage for large jobs.

OSHA has regulations covering workers dealing with lead-containing surfaces. See Chapter 9 and Appendix 6.

In some areas, market forces and government-funded abatement programs have produced a pool of qualified lead abatement contractors. These contractors have invested in training, thus equipping their supervisors and workers with the ability to perform abatement work safely. Since industrial hygienists or professional environmental consultants monitored many of these projects, they are often a good resource for finding qualified contractors.

Lists of certified supervisors in a given locale may be available from:

The Lead and Environmental Hazard Association  
 P.O. Box 535  
 Olney, MD 20830  
 (301) 924-5490  
<http://www.lehaonline.org>

The Environmental Information Association  
 6935 Wisconsin Avenue, Suite 306  
 Chevy Chase, MD 20815-6112  
 (301) 961-4999  
[www.eia-usa.com](http://www.eia-usa.com)

EPA (to locate certified abatement firms where EPA administers the certification program):  
[http://cfpub.epa.gov/flpp/search.cfm?Applicant\\_Type=FIRM](http://cfpub.epa.gov/flpp/search.cfm?Applicant_Type=FIRM)

Local Health Departments

Local Environmental Agencies

Local Public Housing Authorities and Tribally-Designated Housing Entities (TDHEs)

Local Housing and Community Development Agencies

## 2. Interim Controls

EPA requires that firms and renovators performing renovation (which includes most interim control measures) in target housing and child-occupied facilities be certified under EPA's Renovation, Repair, and Painting (RRP) Rule; similarly, there is an exemption for "minor repair and maintenance" projects (<http://www.epa.gov/lead/pubs/renovation.htm>). HUD's Lead Safe Housing Rule requires that workers trained in lead-safe work practices perform all but the smallest ("de minimis") interim control work in federally owned or assisted target housing; since the EPA's Renovation, Repair, and Painting (RRP) Rule went into effect in 2010, HUD's lead-safe work practices training requirement is satisfied by EPA's renovation certification training requirement.. See Chapter 11, Interim Controls, for more information on this type of work.

### G. Public Housing Authorities, Tribally-Designated Housing Entities and Other Housing Agencies

Much lead hazard control work in this country has occurred in housing owned by Public Housing Authorities and Tribally-Designated Housing Entities (TDHEs), which are local and tribal agencies supported by HUD. In addition, many state and local governments have promulgated lead hazard control laws. Representatives from housing authorities and State and local governments can provide various kinds of help and information to owners or residents undertaking lead hazard control work, such as the names of contracting firms. See Appendix 6 for Lead Disclosure Rule discussion.

### H. Insurance Companies

All risk assessors, inspectors, contractors, consultants, planners, and waste-hauling companies may need to be bonded and insured. Insurance companies are providing different types of lead insurance. Owners should make certain that any company retained for lead hazard control is insured specifically for lead exposures, and in the case of renovation projects, certified renovation firms would be prudent to have lead insurance. See Appendix 9.1 for more information.

### I. Real Estate Brokers and Agents

Pursuant to Section 1018 of Title X and the Lead Disclosure Rule (specifically, 24 CFR 35.94 (HUD's regulation) or 40 CFR 745.115 (EPA's regulation)), real estate brokers and agents who are involved with real estate sale or lease transactions of most pre-1978 housing in compliance are responsible for ensuring that sellers and lessors comply with the applicable disclosure requirements. Agents must inform sellers or lessors that they must provide the agent and buyers or renters with the following before the parties sign the sale or lease.

- ◆ Give an EPA-approved information pamphlet.
- ◆ Disclose any known information concerning lead-based paint or lead-based paint hazards or state there is no such knowledge.
- ◆ Provide any records and reports on lead-based paint and/or lead-based paint hazards which are available to the seller or landlord.
- ◆ Include a Lead Warning Statement and confirmation that the seller or landlord, and all agents involved have complied with all disclosure requirements, as an attachment to the sales contract, or an attachment to, or within the lease contract.
- ◆ Sellers must provide homebuyers a period of time, typically 10 days, to conduct a paint inspection or risk assessment; the buyer may waive this period.

See Appendix 6 for additional Lead Disclosure Rule discussion.

### III. Health

Health professionals, including clinical and public health professionals, and health agencies play a leading role in conducting public education campaigns, enforcing local lead control laws, and identifying those children and workers who have already been poisoned (see Figure 2.1).

#### A. Public Health

In some cases public health agencies can legally mandate changes in the dwelling when a poisoned child has been identified. However, treatment is often limited to providing medical therapies or blood lead screening programs. Reducing exposure (primary prevention) is known to be far more effective than providing medical treatment after poisoning. Because there are still many lead poisoned children and lead hazard control is dangerous work that can exacerbate a given situation if not performed properly, health professionals are often best suited to provide scientific advice and design programs to prevent further poisoning of children or abatement workers by focusing on reducing risk.

The Health Insurance Portability and Accountability Act (HIPAA; P.L. 104-191), and the associated Complete Privacy, Security, and Enforcement (Procedural) Regulation (45 CFR Parts 160 and 164) are Federal controls on health information. HUD’s Office of Healthy Homes and Lead Hazard Control (OHHLHC) functions as a public health authority with respect to children who are lead poisoned (CDC/ HUD Correspondence, 2004). Similarly, the EPA also functions as a public health authority in this subject area. Accordingly, the OHHLHC and EPA may obtain health records pertaining to individual childhood lead poisoning cases.



**FIGURE 2.1** Many local health departments distribute information or conduct outreach activities at health fairs or community meetings.

## B. Health Care Providers

Health care providers can provide expertise on medical surveillance and treatment. Pediatricians often perform routine blood lead screening for their young patients, based on the recommendations from CDC and the American Academy of Pediatrics (AAP). Both organizations now recommend that all children under age 6 be screened routinely for elevated blood lead levels (EBLs) using a blood lead test (not the erythrocyte protoporphyrin (EP) test) (CDC, 1991b; AAP, 1993). Any pediatrician or physician treating children under age 6 should be aware of these recommended medical guidelines.

Organizations that provide information about medical surveillance for lead or blood lead screening include:

U.S. Department of Health and Human Services  
Centers for Disease Control and Prevention  
National Center for Environmental Health  
Healthy Homes and Lead Poisoning Prevention Branch  
4770 Buford Hwy., N.E., MS-F60  
Atlanta, GA 30341  
(770) 488-3000

State and local Childhood Lead Poisoning Prevention Programs (see Appendix 2)

American Academy of Pediatrics  
141 Northwest Point Boulevard  
P.O. Box 927  
Elm Grove Village, IL 60009  
(847) 434-4000  
[www.aap.org](http://www.aap.org)

Association of Occupational & Environmental Clinics  
1010 Vermont Avenue NW, Suite 513  
Washington, DC 20005  
(888) 347-AEOC (2632)  
[www.aoec.org](http://www.aoec.org)

American College of Occupational & Environmental Medicine  
25 Northwest Point Boulevard, Suite 700  
Elk Grove Village, IL 60007-1030  
(847) 818-1800  
[www.acoem.org](http://www.acoem.org)

Local Health Departments (see Child Lead Poisoning Prevention Programs – CLPPP)

Local Poison Control Centers  
1-800-222-1222 to reach the Poison Center that serves your area  
[www.poison.org/otherPC/index.asp](http://www.poison.org/otherPC/index.asp)

### C. Public Health Practitioners

Public health practitioners such as nurses, social workers and community health workers, often are the direct point of contact for blood lead screening programs and often play the role of coordinator between parent, child, physician, and environmental inspector in cases of lead poisoning in children. In many circumstances they conduct the actual blood specimen collection in the home, clinic, or hospital. They are also skilled at communicating information on the sources of lead poisoning and practical ways of reducing exposures.

Organizations that provide information about blood lead screening and sources of lead poisoning include:

American Association of Occupational Health Nurses  
2920 Brandywine Road, Suite 100  
Atlanta, GA 30341  
(770) 455-7757  
[www.aaohn.org](http://www.aaohn.org)

National Association of Pediatric Nurse Practitioners  
20 Brace Road, Suite 200  
Cherry Hill, NJ 08034-2634  
(856) 857-9700  
[www.napnap.org](http://www.napnap.org)

### D. Public Health Departments

Many local public health departments conduct lead poisoning prevention services or can arrange for such services. The development of a primary prevention plan, which identifies and removes hazardous sources of lead exposure before children are harmed, is consistent with the recommendations of the 2005 CDC Statement, *Preventing Lead Poisoning in Young Children* (see Appendix 16).

In addition to preventive services, many public health departments have expanded their efforts beyond identifying and medically treating children who are lead poisoned. Many of them use environmental case management to address the needs of lead-poisoned children. This includes education, identification of lead sources, immediate and long-term interventions to reduce lead exposure, and evaluation of the effectiveness of such interventions. Increasingly, public health departments are coordinating their efforts with housing and environmental protection departments to provide comprehensive care for children at risk.

Local health department contacts for lead poisoning services can be provided by:

State Public Health Agencies

Association of State and Territorial Health Officials  
1275 K Street, NW, Suite 800  
Washington, DC 20005-4006  
(202) 371-9090  
[www.astho.org](http://www.astho.org)

National Lead Information Center Clearinghouse  
800-424-LEAD, Technical Assistance  
[www.epa.gov/oppt/lead/pubs/nlic.htm](http://www.epa.gov/oppt/lead/pubs/nlic.htm)

The National Institute for Occupational Safety and Health's Adult Blood Lead Epidemiology and Surveillance (ABLES) program is a state-based surveillance program of laboratory-reported adult blood lead levels. The program objective is to build state capacity to initiate, expand, or improve adult blood lead surveillance programs which can accurately measure trends in adult blood lead levels and which can effectively intervene to prevent lead over-exposures. More information about the ABLES program is available at <http://www.cdc.gov/niosh/topics/ables/ables.html>.

## IV. Environment

There is significant overlap between public health departments, and environmental professionals and agencies that have primary responsibility for ensuring that proposed construction practices in lead hazard control do not harm workers, the environment, or children who return to the dwelling after work is completed. These protections are accomplished by requiring special equipment, containment, cleanup, project monitoring, and waste management. Environmental professionals provide onsite information to owners and health professionals in the form of risk assessments, inspections, clearance examinations, and surveillance of work practices.

### A. Risk Assessors, Inspectors, Sampling Technicians

Lead-based paint risk assessors are certified professionals who can identify lead-based paint hazards and provide recommendations to owners on acceptable options for controlling them. Lead-based paint inspectors are trained to identify lead-based paint on a surface-by-surface basis. The EPA has published a rule for the certification and training of lead-based paint professionals; see Appendix 6. Information about locating risk assessors or inspector in your area can be found in Section IV.A.4, below.

The EPA and some states have reciprocity arrangements where they recognize certifications from other jurisdictions. You should check with the appropriate authorities to verify what programs are recognized and whether you qualify.

#### 1. Risk Assessors

Certified lead-based paint risk assessors may perform inspections, post-abatement clearances, lead hazard screens, and risk assessments. The qualifications for certification include passing both an EPA- or EPA-authorized state- or tribal- accredited inspector course and risk assessor course. Some states and tribes require initial training curricula to include hands-on practical exercises and/or practical exam. A candidate must then pass the EPA, state or tribal risk assessor certification exam. In addition, for EPA certification, the candidate must meet one of the following requirements: a) have a Bachelor's degree and 1 year of experience in a related field; b) have an Associate's degree and 2 years experience in a related field; c) be certified as an industrial hygienist, professional engineer, registered architect and/or certification in a related engineering / health / environmental field; or d) have a high school diploma (or equivalent) and at least 3 years of experience in a related field. After completing an accredited training course with a course test and, if applicable, a hands-on assessment, inspectors must be re-certified every three (3) years, unless the accredited training curriculum included a proficiency test, in which case, re-certification is every five (5) years. EPA, States and Tribes charge a fee for certification Other state and tribal requirements may vary.

There are additional skills and experience that an owner may consider when selecting a risk assessor. This experience may include a background in housing construction, rehabilitation, maintenance, and exposure assessment (see Figure 2.2). Architects, engineers, and code enforcement officials may have such experience. Industrial hygienists and other environmental health practitioners generally are experienced in environmental sampling and interpretation of results.

A risk assessor who also has experience in the management, maintenance, and renovation of housing is more likely to be able to make judgments about the quality of the existing housing stock, the likely effectiveness of hazard controls, and the effectiveness of existing management and maintenance operations. Such a risk assessor will be able to make practical recommendations about how to modify existing management and maintenance procedures to minimize lead hazards.

It is important for housing owners to employ a firm and individual with the commitment and ability to address residents' concerns. Risk assessors also should have the ability to communicate effectively and answer questions clearly.

## 2. Inspectors

Certified inspectors may perform paint testing, paint inspections and post-abatement clearances. To qualify for certification, individuals must pass an EPA- or EPA-authorized state- or tribal-accredited inspector course with a course exam. Some states and tribes require initial training curricula to include hands-on practical exercises and/or practical exam. Where EPA administers the program and in some state-accredited programs, a candidate must also pass the inspector certification exam administered by the EPA or the state. Recertification is generally required every three (3) years. If the accredited course included a proficiency test, candidates must apply for recertification every five (5) years. Costs of certification include training and a certification/licensing fee paid to the state.

Ideally, in addition to training the inspector will also have substantial experience in inspection according to the paint testing procedures in these *Guidelines*. Firms that have experience working with public housing authorities, other housing agencies and childhood lead poisoning prevention programs may be particularly well qualified.

Inspectors should be fully trained and competent in the use of portable X-ray fluorescence (XRF) analyzers and be able to explain protocols for their use, since XRF is the principal means of inspecting housing units. Protocols should include sampling plans for various types of housing, quality control procedures to ensure reliability of measurements, procedures for confirmatory testing, and the documentation required under these *Guidelines* (see Chapter 7). The inspection report should also provide references from previous inspections.



**FIGURE 2.2** Risk assessors and property owners planning housing rehabilitation may find an on-site meeting facilitates communication about lead-based paint hazards on a property.

It is important for housing owners to employ a firm and individual with the commitment and ability to address residents' concerns. Inspectors also should have the ability to communicate effectively and answer questions clearly.

### 3. Sampling Technicians

EPA and some states and tribes certify dust sampling technicians (previously called by HUD "clearance technicians"). They may perform clearance testing on pre-1978 housing that are being cleared after a renovation projects under EPA's Renovation, Repair, and Painting (RRP) Rule, and on pre-1978 housing that is receiving Federal financial assistance or being sold by the Federal government after any of the following activities are performed: interim control activities, rehabilitation that disturbs painted surfaces, and maintenance activities required under HUD's Lead Safe Housing rule to address lead hazards. However, dust sampling technicians are not permitted to conduct clearance after abatement activities, and are not permitted to conduct dust sampling in risk assessments or lead hazard screens. Only certified risk assessors or inspectors can perform such post-abatement clearance testing, and only certified risk assessors can perform dust sampling in risk assessments. EPA's Renovation, Repair and Painting rule defines dust sampling technicians as individuals who perform dust sampling not in connection with an abatement. The RRP rule also provides requirements for training and certification of dust sampling technicians.

### 4. Finding Qualified Risk Assessors and Inspectors

Although lead hazard evaluation and control activities are highly specialized, as in other professions, the quality of individual providers or firms varies widely across the U.S. Many lead-based paint professionals provide excellent service. However, HUD has also reviewed some reports that failed to meet the minimum EPA requirements, or were unclear or poorly written. Many state regulatory agencies do not have the resources to routinely monitor the quality of lead-based paint evaluation and control services or routinely collect and review evaluation or abatement reports for compliance or quality and monitor based on tips and complaints. Property owners and housing agencies should follow their standard procedures for hiring and compensating any qualified contractor or professional in their area. These steps often include contacting several company references and/or contacting local consumer-oriented organizations or agencies.

Certified risk assessors and inspectors can be identified by contacting the State or local agency responsible for certifying or licensing individuals or by contacting one of the following groups:

EPA website with links to state certification programs:

<http://www.epa.gov/lead/pubs/traincert.htm#where>

State lists of certified firms and individuals.

EPA website with links to EPA administered Accredited Training Programs:

[http://cfpub.epa.gov/flpp/search.cfm?Applicant\\_Type=training](http://cfpub.epa.gov/flpp/search.cfm?Applicant_Type=training)

EPA website with links to EPA authorized Accredited Training Programs (38 States, 3 Tribes, Puerto Rico, and Washington D.C.): <http://www.epa.gov/oppt/lead/pubs/nlic.htm>

You may also check with National Lead Information Center Clearinghouse, 800-424-LEAD (5323) (The Clearinghouse provides technical assistance by phone to the general public and professionals.)  
<http://www.epa.gov/opptintr/lead/pubs/nlic.htm>

EPA website with links to EPA administered Abatement Contractor certification:  
[http://cfpub.epa.gov/flpp/search.cfm?Applicant\\_Type=FIRM](http://cfpub.epa.gov/flpp/search.cfm?Applicant_Type=FIRM)

The Lead and Environmental Hazard Association  
P.O. Box 535  
Olney, MD 20830  
(301) 924-5490  
[www.lehaonline.com](http://www.lehaonline.com)

The Environmental Information Association  
6935 Wisconsin Avenue, Suite 306  
Chevy Chase, MD 20815-6112  
(301) 961-4999  
[www.eia-usa.org](http://www.eia-usa.org)

## B. Waste Managers and Environmental Protection Departments

Environmental protection departments are organized at the State and sometimes the local level. These departments are often responsible for regulating hazardous wastes generated within their jurisdictions. Some may also require permits for lead hazard control work. Regional EPA offices can provide guidance on the appropriate regulatory agency for any given area. (See Appendix 3 for a list of EPA regional offices.)

Waste management is a complex area that may require special assistance. The local or State agency regulating waste should *always* be contacted to determine applicable requirements. In most cases lead abatement supervisors or risk assessors can provide the necessary information on how to handle and dispose of any hazardous waste. Since hazardous waste is regulated at the Federal, State, and local levels, owners should take steps to ensure that all applicable regulations are followed and that all necessary manifests (forms) and permits have been obtained. Owners are ultimately responsible for proper waste disposal and should make sure that the transporter and disposer have liability insurance that protects the owner. Sources of information on waste management include:

EPA Resource Conservation and Recovery Act (RCRA), Superfund, and Underground Storage Tanks (UST) [www.epa.gov/compliance/civil/rcra/rcraenfstatreq.html](http://www.epa.gov/compliance/civil/rcra/rcraenfstatreq.html)

National Conference of State Legislatures (NCSL)  
1560 Broadway, Suite 1700  
Denver, CO 80202  
(303) 830-2200  
[www.ncsl.org](http://www.ncsl.org)

(NCSL can provide information about current State regulations and appropriate State agencies in each area.)

State hazardous and solid waste agencies (see Chapter 10)

Analytical laboratories performing Toxicity Characteristic Leachate Procedure (TCLP) Analysis  
(see Section E, below)

Treatment, Storage, and Disposal facilities

Hazardous waste consultants and brokers

### C. Other Environmental Consultants

Although a certified lead-based paint inspector or lead-based paint risk assessor should always be used to conduct lead inspections and risk assessments, professionals in a variety of other environmental disciplines can sometimes provide advice. Some environmental disciplines have certification or separate licensing programs; however, a professional certification or license in another environmental, engineering, housing, or building inspection field is no guarantee of competence in lead hazard evaluation or control, although many professionals in these fields will obtain the necessary additional training before undertaking this work. Owners contracting with these individuals should determine if the individuals' previous training, experience, and qualifications are appropriate for housing. In addition, professional liability insurance usually excludes lead hazard control work at this time.

Many (but not all) industrial hygienists are certified by the American Board of Industrial Hygiene after 4 years of experience, achievement of a college degree, and successful completion of an examination on the principles and practice of their professions.

Registered architects, licensed professional engineers, and environmental consultants generally possess a 4- or 5-year accredited professional degree, several years of experience and internships, and successful completion of an examination on the principles and practice of their professions. Most states recognize the registration by the National Council of Architectural Registration Boards.

Certified safety professionals can provide advice regarding safety issues. Specifically, they identify hazards and evaluate them for the potential to cause injury or illness to people or harm of property and the environment, recommend administrative and engineering controls that eliminate or minimize the risk and danger posed by hazards ([www.bscp.org](http://www.bscp.org)).

Organizations involved with these groups include:

American Board of Industrial Hygiene (Certified Industrial Hygienists)  
4600 West Saginaw, Suite 101  
Lansing, MI 48917  
(517) 321-2638  
[www.abih.org](http://www.abih.org)

American Institute of Architects  
1735 New York Avenue NW.  
Washington, DC 20006  
(202) 626-7300  
[www.aia.org](http://www.aia.org)

American Industrial Hygiene Association  
3141 Fairview Park Drive, Suite 777  
Falls Church, VA 22042  
(703) 849-8888  
[www.aiha.org](http://www.aiha.org)

American Academy of Environmental Engineers  
 130 Holiday Court, Suite 100  
 Annapolis, MD 21401  
 (410) 266-3311  
[www.aeee.net](http://www.aeee.net)

National Council of Architectural Registration Boards  
 1801 K Street, NW, Suite 700K  
 Washington, DC 20006  
 P: (202) 783-6500  
 F: (202) 783-0290  
[www.ncarb.org](http://www.ncarb.org)

National Society of Professional Engineers  
 1420 King Street  
 Alexandria, VA 22314-2794  
 (703) 684-2800  
[www.nspe.org](http://www.nspe.org)

Board of Certified Safety Professionals  
 2301 W. Bradley Avenue  
 Champaign, IL 61821  
 (217) 359-9263  
[www.bscp.org](http://www.bscp.org)

#### D. Suppliers

Suppliers can often provide expert advice on products used in lead hazard control projects, such as high-efficiency particulate air (HEPA) vacuums, personal protective clothing, respirators, containment systems, paint removal products, enclosures, encapsulants, and cleaning agents. Owners or contractors should always question suppliers regarding the limitations of the product and obtain references from previous customers.

Local suppliers can be found by consulting the yellow pages or one of the following trade organizations:

The Lead and Environmental Hazards Association  
 P.O. Box 535  
 Olney, MD 20830  
 (301) 924-5490  
[www.lehaonline.org](http://www.lehaonline.org)

The Environmental Information Association  
 6935 Wisconsin Avenue, Suite 306  
 Chevy Chase, MD 20815-6112  
 (301) 961-4999  
[www.eia-usa.org](http://www.eia-usa.org)

## E. Laboratories

Analysis of lead-based paint, soil, or dust samples in the laboratory is difficult. Any laboratory performing analysis of lead in housing and child-occupied facilities built before 1978 must be recognized by the EPA's National Lead Laboratory Accreditation Program (NLLAP; <http://www.epa.gov/lead/pubs/nllap.htm>), which, as of the publication of this editions of these *Guidelines*, recognizes four organizations as accrediting bodies that accredit laboratories for lead sample analysis:

American Association for Laboratory Accreditation

American Industrial Hygiene Association Laboratory Accreditation Programs, LLC

ANSI-ASQ National Accreditation Board/ACLASS

Perry Johnson Laboratory Accreditation, Inc.

To gain recognition under NLLAP, laboratories must successfully participate in the Environmental Lead Proficiency Analytical Testing Program (ELPAT) administered by the American Industrial Hygiene Association, and meet other requirements. Other organizations may be recognized as having a competent proficiency testing program in the future. Laboratories must successfully pass the onsite visit and be rated as proficient in ELPAT to be recognized by EPA. Owners, contractors, inspectors, and risk assessors should request a copy of the accreditation certificate and should verify with the appropriate organization that the laboratory under consideration does in fact perform adequately. Currently hundreds of laboratories are participating in NLLAP. Many states require analytical laboratories to be licensed by the state. To identify accredited laboratories in any given area, contact:

American Association for Laboratory Accreditation  
5301 Buckeystown Pike, Suite 350  
Frederick, MD 21704  
Phone: (301) 644-3248  
[www.a2la.org](http://www.a2la.org)

American Industrial Hygiene Association  
2700 Prosperity Avenue, Suite 250  
Fairfax, VA 22031  
(703) 849-8888  
[www.aiha.org](http://www.aiha.org)

Perry Johnson Laboratory Accreditation, Inc.  
755 West Big Beaver Road, Suite 1325  
Troy, Michigan 48084  
(877) 369-5227  
[www.pjlabs.com](http://www.pjlabs.com)

ANSI-ASQ National Accreditation Board  
500 Montgomery Street, Suite 625  
Alexandria, VA 22314  
(703) 836-0025  
[www.aclasscorp.com](http://www.aclasscorp.com)

National Institute for Occupational Safety and Health (NIOSH) Information Service  
800-35-NIOSH  
[www.cdc.gov/niosh](http://www.cdc.gov/niosh)

National Lead Information Center  
800-424-LEAD (Ask for the most current list of EPA-recognized laboratories for analyzing lead in paint, dust, or soil.)  
[www.epa.gov/lead/pubs/nlic.htm](http://www.epa.gov/lead/pubs/nlic.htm)

Note that hearing- or speech-challenged individuals may access the federal government numbers above through TTY by calling the toll-free Federal Relay Service at 800-877-8339.

## **F. Training Providers**

Risk assessors, inspectors, lead abatement supervisors, planners, and abatement workers, abatement supervisors, certified renovators, and dust sampling technicians must all be trained by accredited training providers. When contracting for training services, potential trainees should always ask to see proof of accreditation. The State agency responsible for accreditation can be contacted for a list of training providers in any given area (see <http://www.epa.gov/oppt/lead/pubs/traincert.htm>).

Training providers seeking information on instructional design, curriculum development or delivery can contact:

The American Society for Training and Development  
1640 King Street, Box 1443  
Alexandria, VA, 22313-2043  
Phone: (703) 683-8100  
Fax: (703) 683-8103  
[www.astd.org](http://www.astd.org)

The National Environmental, Safety and Health Training Association  
P.O. Box 10321  
Phoenix, AZ 85064-0321  
(602) 956-6099  
Fax: (602) 956-6399  
[www.neshta.org](http://www.neshta.org)

# Reference

CDC/HUD Correspondence, 2004. Letter from Dr. Mary Jean Brown and Dr. David E. Jacobs to the directors of all State and local public health agencies.