



# Federal Requirements for Volunteer Paint and Rehabilitation Programs

## Volunteers Supporting Community Needs and Protecting Children from Lead Hazards

HUD recognizes the important role of volunteer paint and rehabilitation programs in enhancing community vitality and promoting volunteerism.

These programs are often assisted by HUD (typically through Community Development Block Grant or HOME funds) and may involve homes built before 1978. To ensure that children and volunteers are protected from lead exposure, HUD has issued new lead safety requirements that apply to the paint and rehabilitation programs it funds. **These requirements were published on September 15, 1999 and will become fully effective on September 15, 2000.**

This fact sheet provides an overview of the lead safety requirements for housing built before 1978, receiving less than \$5,000 in federal rehabilitation assistance. For the detailed requirements of these and programs receiving more than \$5,000 in federal rehabilitation assistance, please see Subpart J of the regulation.

Although these requirements only apply to HUD-assisted programs, HUD encourages all volunteer programs to prevent lead poisoning by work safely with lead paint.

### Background

Most housing built before 1978 contains some lead-based paint. Lead paint dust, chips and contaminated soil

can poison young children, their parents, and workers if safe work practices are not followed.

### Working Safely With Lead Paint

The new requirements emphasize "safe work practices" which are intended to reduce the generation of dust and prevent contamination of the property. Safe work practices help to protect residents and volunteers from lead exposure.

Volunteers should know how to protect themselves, residents, and their families from lead paint dust, paint chips and contaminated soil. Working safely with lead requires few new tools and techniques. Volunteer organizations should follow these simple steps to minimize the risk of lead poisoning:

### General Precautions

- Identify tasks on each project where children should be excluded because they may be exposed to lead dust.
- Ensure that durable plastic sheeting and tape are available to isolate the worksite and cover the floor and ground.
- Before sanding or scraping, use a spray bottle to dampen painted surfaces to control lead dust.
- Use a utility knife to pre-score painted material being removed. Dampen the area before scoring.

### Relocation

Volunteer paint and rehabilitation programs are typically of short duration. Thus, relocation of residents will probably not be required. However, young children (and pregnant women) should not be permitted in the work area itself. The regulation states that relocation is not required when:

- The work will not disturb lead-based paint, or create dust-lead or soil-lead hazards; or
- The work is on the exterior only and openings are sealed to prevent dust from entering the home, the work area is cleaned after the work is completed, and the residents have alternative entry; or
- The interior work will be completed in one period of less than 8-daytime hours and the work site is contained to prevent the release of dust into other areas of the home; or
- The interior work will be completed within 5 calendar days, the work site is contained to prevent the release of dust, the worksite and areas within 10 feet of the worksite are cleaned at the end of each work day to remove any visible dust and debris, and the residents have safe access to kitchen, bath and bedrooms.

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### TESTING FOR LEAD PAINT

- Prior to doing the work, painted surfaces that will be disturbed by the rehabilitation activity must be tested for lead paint by a certified lead inspector (often available at local housing or health departments).
- Paint chip analyses can be performed for as little as \$5-10 per sample.
- Since much paint does not contain lead, testing indicates what additional requirements will apply. If no lead is present, no additional requirements apply. If lead is present, safe work practices must be followed.
- **As an alternative to testing, one can presume that lead paint is present and follow the safe work practices described below.**

### SAFE WORK PRACTICES

Safe work practices reduce the amount of dust generated and include: 1) a prohibition on specific methods of paint removal, 2) occupant protection and worksite preparation, and 3) specialized cleaning.

Following the work, you must perform a clearance examination of the worksite to make certain it is safe for residents to enter.

**Safe work practices are not required if the area of paint which will be disturbed is below a de minimus (or threshold) level. The de minimus levels are:**

- Twenty square feet for exterior surfaces
- Two square feet for any one interior room or space, or 10 percent of the total surface area of any small surface such as a window sill or trim.

### Prohibited Practices

Effective November 15, 1999, certain methods of paint removal are prohibited because they release large amounts of dangerous dust and fumes.

Prohibited methods are:

- Open flame burning or torching
- Machine sanding or grinding without a high-efficiency particulate air (HEPA) exhaust control (this includes the use of belt sanders)
- Abrasive blasting or sandblasting without HEPA local exhaust control
- Heat guns operating above 1100 degrees Fahrenheit or charring the paint
- Dry sanding or dry scraping, except dry scraping in conjunction with heat guns or within 1 foot of electrical outlets, or when treating defective paint spots totaling no more than the de minimus levels
- Paint stripping in a poorly ventilated space using methylene chloride

### Worksite Protection

Occupants and their belongings should be protected and the worksite prepared by:

- Excluding residents from the worksite.
- Taping heavy plastic over floors, doors, windows, and vents to prevent the release and spreading of lead dust, paint chips and debris.
- Moving furniture out of the work area or covering it with heavy plastic.

### Cleaning

Specialized cleaning of the work area following the job can effectively remove lead dust and prevent lead exposure.

- Use a High Efficiency Particulate Air (HEPA) vacuum to clean all floors and other surfaces where dust can settle.
- Wash floors, walls, window sills, and other surfaces with detergent and rinse with fresh water.
- Dispose of debris, paper towels and wash cloths in heavy plastic bags. Never burn lead debris.

### Clearance

Following the rehabilitation activities, clearance is required unless the painted surfaces which were disturbed are less than the de minimus levels (see safe work practices).

- Clearance examinations include a visual evaluation *and* a dust test to determine if hazardous levels of lead remain following cleaning.
- Clearance examinations must be performed by a certified lead-based paint inspector, risk assessor, or clearance technician (local community development agency, housing or health departments are often able to provide this testing).

### For More Information

To speak to a HUD Specialist about the new Federal regulation, call (202) 755-1785x104 or send e-mail to [lead\\_regulations@hud.gov](mailto:lead_regulations@hud.gov). For copies of the HUD regulation (*Final New HUD Regulation on Lead-Based Paint Hazards in Federally Owned Housing and Housing Receiving Federal Assistance*, September 1999), or HUD's *Lead Paint Safety Field Guide*, call the National Lead Information Center at (800) 424-LEAD or visit [www.hud.gov/lea](http://www.hud.gov/lea)

