### Lead 101

LEAD INSPECTOR RISK ASSESSOR TRAINING



### **Interesting Fact**



- Pre-1978 housing may contain lead-based paint
- Romans added lead to sweeten their wine.
- Wealthy Roman families had increased risk of "going crazy"
- Could this have contributed to the fall of the Roman Empire?
- ■Were the wealthy Romans lead poisoned?

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### Lead Exposure

- Environmental
  Paint
- ■Dust
- ■Soil
- Water

### Non-Environmental

- Ayurvedics
- Imported Food, Spices
- Occupational
- Hobbies
- Jewelry, Toys, Clothing

### Lead Paint



- Lead in paint was banned in 1978
- Pre-1978 housing may contain lead-based paint
- ■74% of homes built prior to 1980 have lead paint
- Pre-1950 even higher probability lead paint
- In CT, 35% of housing stock is pre-1950

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### Lead Paint Hazard Standards

### Toxic Levels:

- Paint for sale (wet paint): > 0.06% lead by weight
- Paint chip: ≥ 0.5% lead by weight
- X-ray Florescence Analyzer (XRF):  $\geq 1.0 \,\mu g/cm^2$



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### Lead Dust

- ■Not visible (typically)
- ■Very fine
- High friction leaded surfaces create dust
- ■Created by renovating pre-1978 homes

### Solution

■ Wet cleaning and lead-safe work practices



### **Dust Hazard Standards**

### **Dust Hazard**

Risk Assessment:

Floor:  $\geq$  40  $\mu g/sq$ . ft

Window sill:  $\geq 250 \,\mu\text{g/sq}$ . ft



### Soil

May contain:

- paint chips
- lead dust



### Solution

- Cover bare areas by planting grass, shrubs, or with mulch
- Wipe shoes on mats or remove shoes before entering the home

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### Soil Hazard Standard

- > 400 ppm must be abated
- Planting grass
- Shrubs
- Mulch
- Excavate, Remove & Replace
- Other landscaping material
- > 5,000 ppm must use permanent methods
- Concrete
- Pave
- Excavate, Remove & Replace

### Water

- Lead pipes
- ■Solder
  - Lead solder banned in plumbing = 1986
- ■40 million households private wells
  - Higher risk of lead in pipes
- •Chemical changes made to water systems
  - Change in water source without correct corrosive control
  - Flint, MI (corrosive water =leaches lead from pipes)

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### Water Hazard Standards

Public water systems:

■.015 mg/L or 15 ppb



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### **Clearance Standards**

### **Dust Clearance**

Post Abatement:

Floors:  $<40~\mu g/sq.$  ft Window sill:  $<250~\mu g/sq.$  ft Window well:  $<400~\mu g/sq.$  ft



### Non-Environmental Sources

### Occupational

- ■Demolition Work
- ■Bridge Work
- Factory Work
- Arms Manufacturing
- Battery recycling
- Firing Ranges

### Food

- Gardening
- Imported Foods



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### Non-Environmental Sources

### Hobbies

- Ceramics
- Stained glass soldering
- Firearms/bullet making

### Cultural

- Ayurvedics
- Makeup



### Children's Products

- Toys
- Jewelry
- Clothes



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### Ayurvedics - plant based

- Herbs, minerals, metals, animal products
- 1 in 5 contain harmful levels of lead, mercury, and arsenic\*
- Imported from India & South Asian countries
- Regulated as dietary supplements
- (i.e. medical standards do not apply)



Robert B. Saper, MD, MPH; Stefanos N. Kales, MD, MPH; Janet Paquin, PhD; Michael J. Burns, MD; David M. Eisenberg, MD; Roger B. Davis, ScD; Russell S. Phillips, MD. (2015, December, 15). Heavy metal content of Ayurvedic Herbal Medicine Products. Retrieved from JAMANetwork./journals

### Gardening

Food contamination from...

- Improper food handling
- Working with contaminated soil then touching food
- \*Lead contaminated soil (controversial)
- Test soil prior to planting
- Use a raised garden with new soil



### Imported Foods and Candy

Packaging food products:

- Leaded ink is used in/on candy wrappers
- 1995 FDA policy for industry ban on leaded ink
- Lead solder is used to seal imported metal food cans
- 1991 US banned the use of lead solder on US manufactured food products
   1995 US banned the use of lead solder on imported food products

Problem is....

- Only a small amount of imported products are tested
- Potential food contamination
- Limited FDA standards



### **Occupational Lead Exposure**

- Painters, renovators, abatement workers, etc...
- Lead dust can contaminate.....
  - $\checkmark$ Interior of vehicle
  - $\checkmark$ Clothes
  - √Shoes
- ■Important to remember....
- Shower on worksite if possible
- At a minimum wash hands and face
- Change clothes and shoes before leaving worksi
- Remove shoes before entering home
- Wash work clothes separately



### Hobbies: Pottery & Ceramics

- Imported pottery may be coated in glaze containing lead
- Over time lead may leach out of the pottery
- If unsure, use as decoration rather than for food



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### Lead in Pewter

- Low grades of pewter may contain lead
- Over time lead may leach out into food and beverages
- Do not store food or beverages in pewter containers



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### **Potential Leaching Sources**

Lead Crystal

Pots and Pans

Pressure cooker's rubber seal







Lead can leach out of lead crystal, pitted pots and pans and rubber seals into acidic beverages or food!!!

### **Hobbies: Lead Soldering**

- Used in stained glass
- Releases toxic lead fumes
- Should be done away from children and pregnant women
- Done in well ventilated area
- "Use personal protective equipment (PPE)



### Lead and Firearms

- Lead dust is generated from bullets moving down barrels and when hitting bullet traps in a firing range
- High levels of dust may settle on instructors or shooters skin and/or clothing
- Clothing and shoes should be changed before entering the car or home.
- Showering can remove any lead dust on the skin

### Lead in Firing Ranges Fact Sheet:

 $\label{lem:https://portal.ct.gov/-/media/Departments-and-Agencies/DPH/dph/environmental_health/eoha/pdf/FiringRangeFSpdfpdf?la=en$ 

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### Children's Jewelry

- ■Inexpensive jewelry can have high levels of lead
- Discount stores and gumball machines



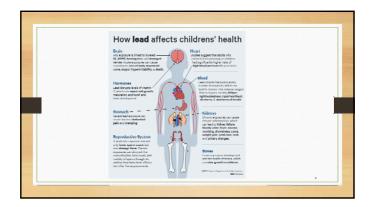
Do you know  Jarnell Brown		
In Minnesota on February 22, 2006, Jarnell Brown died from lead poisoning after swallowing a metal charm, which laboratory testing revealed to be 99.1% lead		
Who was Freddie Gray?		







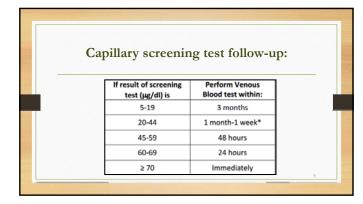




A. Universal Blood Lead Testing is Mandated  Test children:  Between 9 months and 36 months of age, each year for elevated blood lead levels  Most providers test at 12 months and 24 months of age Between 36-72 months of age, if not previously been tested, regardless of risk  <72 months of age, with developmental delays (especially if associated with pica)
Every child in CT <u>MUST</u> be tested twice for a BLL between the ages of 9-36 months
Generally pediatricians test at 12 and then again at 24 months

## Blood Lead Level Reporting Laboratories must report BLLs ≥ 10μg/dL (includes Leadcare II) within 48 hours to DPH and LHD CGS § 19a-110(a)

FOR A CHILD WHO HAS RECEIVED A BLOOD LEAD TEST			
	by Health Care Profes	or elevated blood lead levels of age tested, requestions of risk	1
	Timetable for Confirming Capillary (Screening) Blood Lead Results with a Venous Blood Lead Test*	Schedule for Follow-up Veneus Blood Lea Children with an Elevated Blood Lea	d Yasting for
	If result of screening furfaces Veneses test (pg/40) to Blood test within	Level (1" 3-4 texts after (after	e follow up or BLL begins a declinat
	5-39 3 months		nd within



venous tes	st follow-up:	
Venous	Early followup	Late follow-up
blood lead	(first 2-4 tests	(after BLL begins to
level	after	decline)
(μg/dL)	identification)	
5 - 14	3 months	6 - 9 months
15 - 19	1 - 3 months	3 - 6 months
20 - 24	1 - 3 months	1 - 3 months
25 - 44	2 weeks - 1 month	1 month
> 45	As soon as possible	Chelation with subsequent follow-u

## Problems with retesting: If a medical provider is not following <u>DPH REQUIREMENTS</u> AND GUIDELINES:

- Educate provider on screening requirements
- Notify the LR&HHP
- Contact Regional Lead Treatment Center (RLTC),
- Ask them to contact the doctors to remind/re-educate
- Refer the family to the RLTC for follow-up care



### Problems with retesting:

➤ If the parents or guardians are refusing to get a child retested....

- Enlist the help of Pediatrician
- $\bullet~$  A referral to DCF may be warranted (it depends on the situation & BLL)

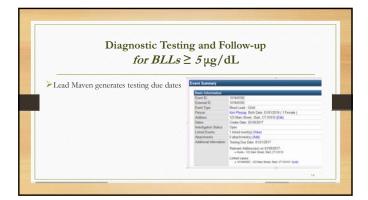
### CT DCF Mission:

Working together with families and communities for children who are healthy, safe, smart and strong.

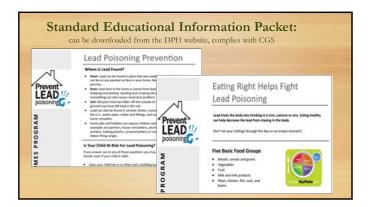
### Effective Child Case Management Practices

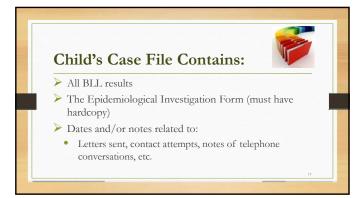
- ightharpoonup Management of BLLs  $\geq$  5  $\mu g/dL$
- ➤ Monitor BLL increases and decreases
- > Utilizing template letters from Lead Maven
- > Provide education to guardians

Child Case Management							
ocal health staff are responsible for:   Having an individual case management file for each child							
					n 5 ug/dL and 9 ug	/ de	
					hild who has a ver		n. i
Providing ca	se management	t (letters, phone o	alls, home vi	isits) for each o	hild who has a cap	illary test ≥ 10 ug	
As needed, r	referring any pa	rent or pediatricia	an to staff in	the Regional L	ead Treatment Cer	nters	
Required Case Manage	ment Follow-	Un By Test Resu	It Level:				
madanca care manage	ment ronour	op by rest hess	it covers				
Test Results	Testing Reminder Letter to Guardians	Standard Educational Information	Call Doctor to Confirm Result	Refer to Regional Treatment Center	Epidemiological Form	Comprehensive Lead Inspection	Call Parents (as needed)
Capillary 5- 9 ug/dL	×	X (recommended, but not required)					
	×	×					x







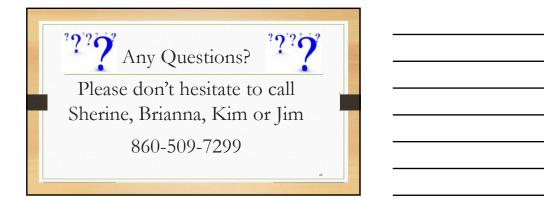


## Document, Document, Document... Times & dates of contact with family & PCP Confirm that educational material provided is understood (available in Spanish on DPH webpage, other languages for some materials) Monitor follow-up care and retesting schedule

Child Case Closur	re Criteria
BLL drops to a venous level of	< 5 µg/dL
No open environmental case	
×	
Child relocates:	T 175-10
Within CT	N LAFF
<ul> <li>Case will be shared with new LHD</li> </ul>	\\ CF
Close case	1
	\

## Child Case Closure Criteria Outside of CT Notify LR&HHP Try to get new address DPH will contact new State's Lead Program DPH must close case

## Child Case Closure Criteria Administrative closure Should have documentation of at least three (3) unsuccessful attempts to locate family (MD does not know where family is, no one lives at house, no working phone, mail undeliverable, etc.) Ask DPH case manager to close case Not to be used often



Timeline for
Completing
EBLL
Investigation

When do I have to complete it and why?



### **Definitions**:

- <u>Elevated blood lead level</u> a blood lead concentration equal to or greater than twenty (20) micrograms per deciliter (µg/dl) or as defined by Connecticut General Statutes section 19a -111.
- Epidemiological investigation an examination and evaluation to determine the cause of elevated blood lead levels. An epidemiological investigation will include an inspection conducted by a lead inspector to detect lead-based paint and report of findings. This investigation must also include evaluation of other sources such as soil, dust, pottery, gasoline, toys, or occupational exposures, to determine the cause of elevated blood lead levels. The investigation may also include isotopic analysis of lead-containing items.

### What is an Epi Investigation?

Comprehensive Lead Inspection (CLI) - an inspection which identifies lead based paint surfaces and hazards. This includes XRF testing, dust, water and soil collection and analysis. Additionally, evaluate other non-environmental sources as a potential lead hazard.

Epidemiological Form - document current version Epiform9 3-15-18, which identifies potential lead exposures and/or factors that could causes a child to have a high BLL



### Notification of BLL to LHD

Blood Lead Level results received from:

- Laboratory
- Labs must report ≥10µg/dL within 48 hours
- Mayer
- •DPH Lead, Radon and Healthy Homes Program

Notification = Beginning of Timeline

## Initiate Epidemiological Investigation

- Schedule epidemiological interview and comprehensive lead inspection
  - Document all communication (phone, letter, fax)

### Why?

- CGS § 19a-111
- RCSA § 19a-111-3(c)(1)

Initiate within 5 working days after Notification of EBLL

## Completion of Epidemiological Investigation

- Completed Epidemiological Form
- Completed comprehensive lead inspection
  - Tested all painted surfaces
  - Taken all samples (dust, bare soil and water)
- Receipt of all laboratory results
- All information must be entered in Maven

### Why?

• CGS § 19a-111

Completed within 30 days from Notification of EBLL

### Inspection of Other Dwellings

- Must occur if a child <6 lives in the same building as an EBLL child
- Must include testing of all defective surfaces (interior, exterior and common areas)

### Why?

- RSCA § 19a-111-3(c)(2)
- RSCA § 19a-111-2(a)(b)(d)(e)

Begin within 30 days from Notification of EBLL – Complete ASAP



### Lead Inspection Testing Summary Form

- After completion of Epi Investigation
  - Submit LITSF to:
    - Property Owner
    - Local Health
    - DPH Commissioner
    - Enter into Maven

### Why?

- CGS § 19a-111j
- RCSA § 19a-111-3(d)

Must be submitted 2 days after completion of Epidemiological Investigation

### Notification Sign

- Posted at every entrance
  - By property owner
    - ✓ Template on dph website "For Local Health"

• RCSA § 19a-111-3(e)

Must be posted 2 days after receipt of Inspection Report

### Lead Abatement Order

- · Lead order must be:
- Issued and signed by DoH
- Sent to Property Owner
   ✓ By certified mail with return receipt
  - ✓ Hand delivered with date documented
- · Enter date issued into Maven

### Template on DPH website "For Local Health"

### Why?

- CGS § 19a-111
- CGS § 19a-111i
- Lead Program Response Protocol Step 5

Completed within 30 days from Notification of EBLL

### What do you do......

- If you have not received all environmental lab results within 30 days from notification of an EBLL?
  - Order letter must be sent for lead painted surfaces and any positive environmental results that you have received
- After receipt of <u>all</u> environmental lab results
  - Send addendum to order letter for positive results

## What is the "Notification of Inspection Results" date?

- Date that Property Owner received Lead Abatement Order letter
  - Date from return receipt of certified mail (green card)
  - Date that Lead Abatement Order was hand delivered
- Important reference date

### Lead Management Plan

- Must be completed for intact leaded surfaces
- Must be submitted by property owner
- Template on DPH website "For Local Health"

### Why?

- CGS § 19a-111j
- RSCA § 19a-111-2(e)

Must be submitted by property owner 60 days after receipt of notification of inspection results

### Lead Abatement Plan

- Submitted by property owner
  - · Can be completed by:

    - ✓ Certified Planner Project Designer
       Verify certification
- Enter date received into Maven
- Template on DPH website "For Local Health"

### Why?

- CGS **§** 19a-111j
- RCSA § 19a-111-5(a)

Submitted within 15 working days of notification of inspection results

### Review Lead Abatement Plan

- Document date that lead abatement plan was received
- Read through abatement plan
- Ensure all positive XRF results are addressed
- Make sure that appropriate abatement methods are used verify contractor licenses
- · Any questions call us
- Enter approved abatement plan date into Maven

### Why?

- CGS § 19a-111j
- RSCA § 19a-111-5(a)

Complete Lead Abatement Plan review within 10 working days of receipt

### Start of Lead Abatement

- Approved Lead Abatement Plan
- Know actual start date
- Conduct site visit(s) during abatement
- Verify Licensed Lead Abatement Contractor
- Enter start date into Maven

### Why?

- CGS § 19a-111j
- RCSA § 19a-111-5(a)

Abatement shall begin within 45 working days from notification of inspection results

### Lead Abatement Completion

- Completed in a timely manner
- Document progress
- Enter completion date into Maven

### Why?

- CGS § 19a-111j
- RCSA § 19a-111-5



The sooner the better!

### Re-Inspection

- LHD notified of completed Lead Abatement
- LHD must conduct a re-inspection

  Verify that all work was done according to approved abatement plan

  Collect clearance dust wipe samples (LHD or Consultant)

  Well, sill and floor in each room or area that was abated
- - Floor sample 10 feet from entrance of abated area
- Enter date into Maven

- CGS § 19a-111j
- RSCA § 19a-111-3(h)(1)



Completed 10 working days after notification of completion of Lead Abatement

### Letter of Compliance

- The following information must be included:
  - Date of re-inspection
  - Dust levels have been found to be in compliance
  - Include statement that the management plan for intact leaded surfaces must be followed (if applicable)
  - Completed by a Code Enforcement Official or Consultant

### Why?

•RCSA § 19a-111-4(f)

Mail 5 working days after lead inspector has found dwelling free of lead hazards

### Post Abatement Inspection Report

Completed by Code Enforcement Officials only

- Post Abatement Inspection Report includes:
  - · Visual inspection
    - ✓ Document date
  - Passing clearance dust wipes
  - Statement indicating all surfaces have been abated
  - Management plan (if applicable)
    - ✓ Document date
- Enter date into Maven

### Post Abatement Inspection Report

- Send Post Abatement Inspection Report
- Property ownerDoH
- DPH Commissioner
- Enter date into Maven
- Notify CT DPH to close case

### Why?

- CGS § 19a-111j
- RSCA § 19a-111-3(h)(1)

Mail within 2 working days after re-inspection is completed

### FYI.....

Code Enforcement Officials can issue a combined Letter of Compliance/Post Abatement Inspection Report



## Your Responsibility for "The Inspection"

- Identify the source(s) or potential source(s) of lead
  - Including non-environmental sources
- Investigate all accessible areas in the residence
  - Including all exterior structures
- Investigate other residences
  - Other units within building w/child< 6
  - Other residences the child frequents
  - Childcare



## A Comprehensive Lead Inspection (CLI) must be done when

- EBLL  $\geq$  20 µg/dL venous
- Two 15-19 μg/dL venous tests > 90 days apart
  - Shall begin within 5 working days
- Other dwelling unit with child < 6 years
  - Must be conducted within 30 days
- Licensure for OEC

### CLI Must be conducted by

- Trained Code Enforcement Official (CEO)
  - Must be current with training certificate
- Licensed Lead Consultant
  - Certified Lead Inspector
  - Certified Lead Inspector/Risk Assessor

### Be Prepared

- Review Surfaces that you need to test
  ✓ 19a-111-3(1) (A&B) interior and exterior
- Field kit:

Tool box with:
Dust wipes with tubes
Zip lock bags for soil sampling
Water sampling bottles (at least 2)
Labels
Pens- permanent marker
Paint scrapper/hammer

Flashlight Camera Tape measure Tape for template Safety goggles Gloves Spoons



- Room Layout Sheets
  - ✓ Interior, exterior, common areas
- Laboratory Collection Forms

### Be Prepared



- XRF
  - DPH has 3 (2 LPA 1s, 1 Heuresis)
  - On loan at Local Health Department
    - 1. Meriden (Heuresis)
    - 2. Stamford (LPA 1)

Make sure battery is charged!

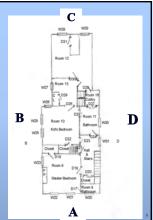
### **XRF** Safety



- Must be trained in Radiation Safety (web based training)
- Must handle with care
- Minimize exposure by distance and shielding
- Keep others from being on the side of the XRF when operating
- Must wear a dosimeter badge

Starting your interior inspection

- Your safety is priority!!
- Proceed room to room in systematic, orderly fashion
- Show orientation
  - ✓ A, B, C, D
  - ✓ Note locations of doors, windows, closets, stairs
  - ✓ Name & # rooms/areas
  - ✓ Note condition of paint
  - ✓ Note housing issues that need correction prior to Abatement
  - ✓ Don't forget Common Areas



### Don't forget the exterior

- Walk/survey the property
- Use A, B, C, D orientation
- Sketch all exterior buildings
  - ✓ detached garages
  - ✓ porch
  - ✓ sheds
  - ✓ play area/play ground equipment
  - ✓ gardens
  - ✓ fence



## Soil Sampling Supplies: 1. Disposable gloves 2. Hard shell containers 3. Labels - marker 4. Lab forms 5. Spoons 6. Bag for completed samples 7. Bag for trash ■ Sample bare soil - drip line, play areas, gardens, etc. ✓ Note sample locations on exterior sketch ✓ Document sampling methodology (grab vs. composite) ■ Results are reported in ppm or µg/mg Action/Harmit levels 100 ppm = control hazard

### Soil Sampling Methodology

### Two types:

- Composite soil sampling
  - Multiple grab samples equidistant over an area

> 5000 ppm = permanent abatement method

- Combine grab samples from one side of the dwelling into one composite
- Use core tool or plastic spoon
- Go to ½ inch deep
- Include paint chips if present
- No more than 10 grabs per composite

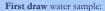
### Grab Soil Sampling

- One sample per location
- Use core tool or plastic spoon
- Go to ½ inch deep
- Include paint chips if present



## Water Sampling Supplies: 1. Water collection container from DPH Lab 2. Labels - marker 3. Lab forms 4. Bag for completed samples • Collect when water has not been used for 6 hours • Collect 2 water samples per dwelling • Label both water bottles (1st & 2nd draw)

### Water Sampling



- Collect as soon as water is turned on
  - ✓ Identifies:
    - Premise plumbing (Water service lines within the home)
    - Fixtures

Second draw water sample (flush sample):

- Collect after 2 minutes of flushing
  - ✓ Private wells may need to run water longer
  - ✓ Identifies:
    - Water from exterior service line/well

Action/Hazard level:

15 ppb = 15 ng/L = 0.015 mg/I

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### **Dust Wipe Collection**

### Supplies:

- 1. Disposable gloves
- 2. Ghost Wipes required
- 3. Hard shell containers
- 4. Labels marker
- 5. Lab forms
- 6. 1 sq ft template or ruler
- 7. Masking tape
- 8. Bag for completed samples
- 9. Bag for trash
- Must sample Floor & Window Sill
- Document/describe location
- Place in labeled container and submit to lab





### **Dust Wipe Collection 101**

- Always change gloves between sample collection
  - ✓ Do not touch anything other than the wipe and the surface to be sampled
- Fold the wipe completely before inserting it in the tube
- Consider pre-labeling dust wipes tubes
- Clean any templates between sampling locations
- A minimum of 2 unused or blank wipes must be submitted
  - ✓ 1 20 dust wipes samples = 2 blanks
  - ✓ Then add 1 blank wipe for every additional 20 samples submitted
  - ✓ 21 40 dust wipes samples = 3 blanks ✓ 41 - 60 dust wipes samples = 4 blanks
- MUST include the dimensions of sampling area

Action/Hazard level: Floors: > 40 ng/ft<sup>2</sup>

Interior Window Sills: > 250 ug/ft<sup>2</sup>

### Paint Chip Sampling

- XRF results are inconclusive
- No flat surface to test
- XRF instrument will not fit in the area to be tested



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### Paint Chip Sampling

### Supplies

- Disposable gloves
- 2. Labels
- 3. Hard shell containers
- Cutting device
- 5. Bag for Collection
- Document/describe location
- Cut and collect 1-4 sq. inches of paint (sample all layers)
- Place in labeled container and submit to lab
- Inspector must repair surface if it was intact

Action/Hazard Level:

≥ .5% by weight or 5.000ppm

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### EPA approved Lead Swabs

 Are these approved in CT as an acceptable method for testing for the presences of lead?

NO!



### **Other Samples**

- Spices
- Pottery
- Toys
- Cosmetics
- Candy
- Candy wrappers
- Ayurvedics
- Hobby supplies



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### **Lab Submission Form**

### Supplies:

- 1. Disposable gloves
- 2. Hard shell containers
- 3. Labels marker
- 4. Lab forms
- 5. Bag for completed samples
- Call us in advance
- Description of product
- Obtain original product with packaging if possible
- Take pictures of product
- Place in labeled container
- Submit to DPH lab

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## Dr. Katherine A. Kelley Public Health Laboratory 395 West Street Rocky Hill, CT $\,\,$ 06067

MAIN NUMBER (860) 920-6500

(860) 920-6710

Sample/Specimen Receiving (860) 920-6680

Outfitting (Supplies) (860) 920-6674/6675



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### XRF Analyzers 101

1	goures Detector
	The last should be
Figu rays	re 5-1. XRF emitting gamma and X and analyzing characteristic X rays paint and substrate

- Instrument exposes a painted surface to radiation emitted from a sealed source
- The source is cobalt-57 (Co-57)
- Co-57 emits energy in the form of gamma rays
- The elements in the paint are "excited" and respond by emitting energy in the form of x-rays, this response in known as fluorescence

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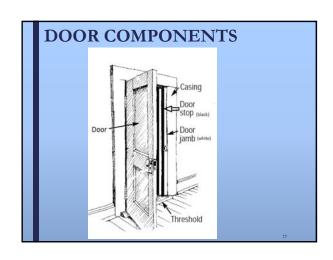
## XRF Use & Operation (LPA 1 specific)

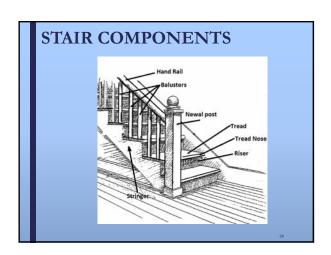


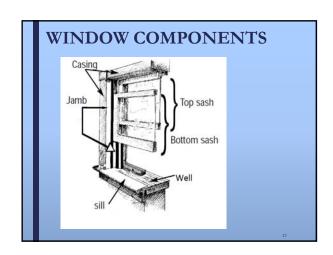
- Geiger counter
  - Take readings before and after use
- Choose a job number (new unit)
- Set abatement level (1.0 mg/sq.cm)
- Calibration: In "Time Corrected" mode (select mode)
  - Measure standard calibration block (1.0 mg/sq.cm.) 3 times
  - Record on data form (.7-1.3 acceptable)
  - Measure blank side (0.0 mg/sq.cm.)  $\underline{\textbf{3 times for reference}}$
- Go to "Quick" mode (select mode) complete all measurements
- Repeat calibration step at end of job and/or every 4 hours

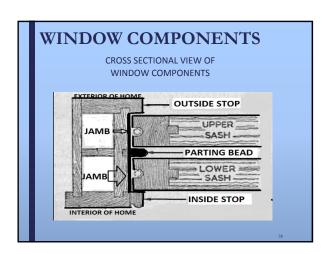
23

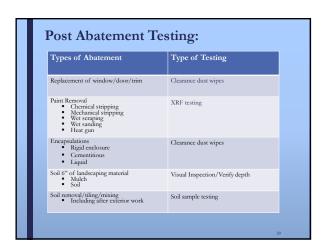
# Heuresis Video











## Post Abatement Testing: Clearance wipe sampling must be done: In every room where abatement was done Common areas where abatement was done Entrance and exit of abatement area

#### **Clearance Standards:**

Floors:  $< 40 \,\mu\text{g/ft}^2$ 

Window sills:  $< 250 \text{ µg/ft}^2$ 

Window wells:  $< 400 \,\mu g/ft^2$ 

Soil: < 400 ppm or mg/kg

#### Lead Abatement Waste Disposal

- Homeowner and Lead Abatement Contractor are responsible for managing waste
- Up to 10 cubic yards
  - ✓ Homeowner is allowed to dispose of
- > 10 cubic yards

✓ TCLP (Toxicity Characteristic Leachate Procedure)

Hazardous waste:

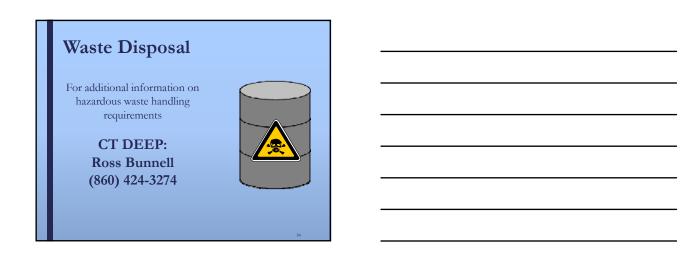
5 mg/kg, 5 mg/l or 5 PPM

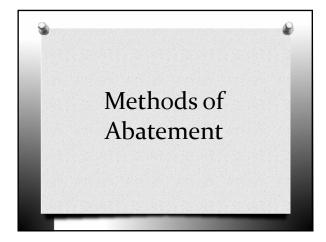
#### **DEEP Regulation**

CT Hazardous Waste:

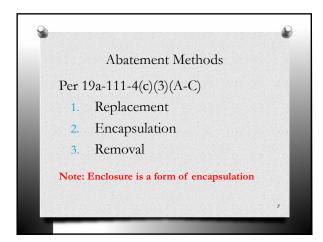
- **Must** be shipped/transported by permitted transporters
- Must go to a permitted hazardous waste treatment, storage or disposal facility (TSDF)

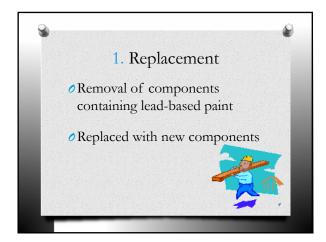


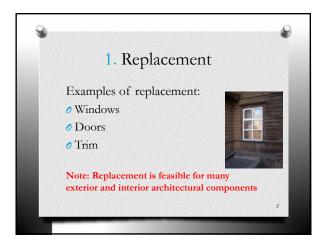


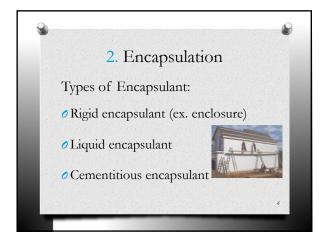


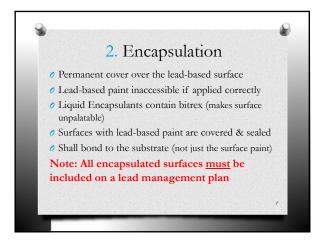
# What is Abatement? Definition: Abatement means any set of measures designed to eliminate lead hazards in accordance with standards established.... including, but not limited to, the encapsulation, replacement, removal, enclosure or covering of paint, plaster, soil or other material containing toxic levels of lead....

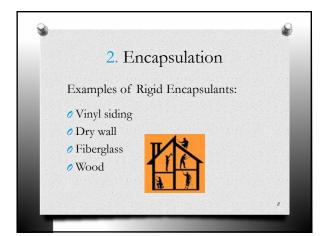




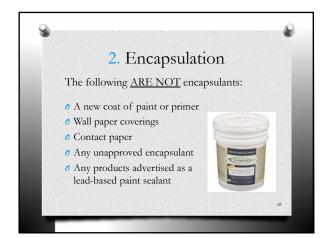






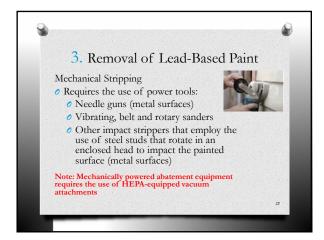


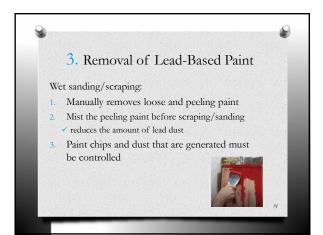


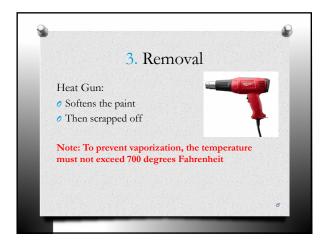




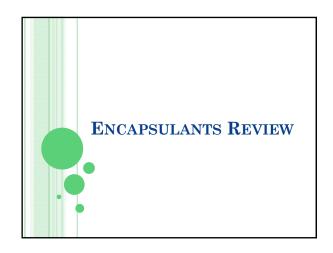












serapsidant. Cirly similar parting to product use. Finds	State of Connecticus - Department of Public Health  (ALD ADD INSTITUTE - DEPARTMENT OF PUBLIC HEALTH  ADD INSTI									
Product frame	Manufacturer	Not Listed for Use on These Sorteres	Finished Product Thickness	Respiratory Protection Required	Occupancy During Application	Interior Use	Authorization Date			
tradical *- poperty/ tree Last Cost** (copied)	Critical Engineeris (Inc.) 791 S. Sartis Clary M. Vyrmura, CA 1980) (800) 306-1982	Histon surface, surface with challeng or salesman must be properly propered.	7 Mills - extensor	For spring application use shoulded Endyments. Shall Dust and Miles Bergorator. Miles Approval #15,-260, 267 or Equivalents.	No - During day of spray application.  No - in sorth price of brush or option seed. Company permitted to other streen it brush or rotter wood and allequate worthstorn or provided for 24 tours after application.	Intersect 105	SA/LVM Crigoral 12/5/12 revision to 566 shokness*			
6.0 CB Lead Survive Compound Type St (Internal (Extensis) Child Sward (Internal (Extensis) (Liquid)	Pille Rock Sectioning to, Inc. 134 Consorted Rock Andrews, MA ESSIS 82139-6882 (1915) 623-9867 (1915) 623-1915	frotton surfaces, impact surfaces, torfaces with soliminer paint, and redistries where temperature exceeds 2079. Chalking surfaces must be allequately propered.	74%	For uptay application use application use bit Sud, Notice approximation	Occupancy or adjacent room(s) permitted during brighter open application. Occupancy during surely application of permitted once application to examine and production has because and product	t-Hentur VEX Exhantur VEX	MATOMOP			

encapsolant, Civily	the products fished or	UE/ RESISTENT and an operations for this Registry are aud	AD AND HEALTH OF AUTHORIZE I'm, that are med for lead for use to	epartment of F ny Homes Program D ENCAPSUCANT P n to be long foring to Committee Linguist or Viction surface. In	AV BOOUCTS services mad pain dant size is prohibited	d on firmsholds, son	dow technic
		Not Listed for Use on These Surfaces		Respiratory Protection Required	Occupancy During Application	Interior Use	Authorization Date
Planter to A Built ((a-month/sus) Oyyourn trapegrated sute Febra	First Well Systems 205 Carolina Drive P.C. Bloc 89 Liberty, South Carolina 29657-6089 (800) 843 5394	that for one on interior purfaces, other than with and cellings. Not recommended for one or face with monthine in their,	35 466	Generally not required during normal use and handling of eater based adherone #500 as applied to Plaster in A Roll.	Occupancy in adjacent resimply perindited during application. Occupancy after agriculture perindition after 28 hours.	oranno HS datemer NO	65696*
Fester Planter Well Under (Certier (Illinia) Opposite Impregnated sate Fabric	Floor-shall Systems 208 Carolina Drive P.O. Box 69 18mms, South Carolina 20657-8089 (880) 843-5394	test for you an interior for faces of the filter walls and callings. Not recommended for your matter with recommended of the call recommended of the face of the f	50 60%	Cenerally not required during number during the and handling of water based adherine #100 as applied to factor Plactor Wall Lime.	Occupancy or adjacent recept) permitted during epitiation. Occupancy after application permetted after 28 hours.	Interes NO	2/4/94

#### REMINDER!

· Application of all authorized encapsulant products must be done in the method and thickness instructed by the manufacturer

#### Question:

Why should we test substrates and encapsulants?

Answer: To test and demonstrate the substrate and/or encapsulant is effective.

#### PRODUCT FACT SHEETS

Each approved encapsulant on the Registry of Authorized Encapsulants have a product fact sheet. All product fact sheets state:

- · Product description
- Application to achieve required product thickness Recommended uses
- Prohibited uses
- Surface preparation Application
- Occupancy information
- Cautions Warranty
- Care & maintenance

Refer to the manufacturer for detailed instructions on how to use their specific product.





# THE APPLICATION & MAINTENANCE OF LIQUID ENCAPSULANTS: FOR CODE ENFORCEMENT OFFICIALS, PROPERTY OWNERS, LEAD CONSULTANTS & LEAD CONTRACTORS

This guidance document (20 pages) includes:

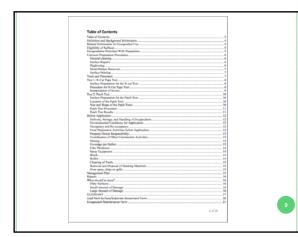
- Definition & Background Information Related Information for Encapsulant Use Eligibility of Surfaces Encapsulation Permitted with Preparation Common Preparation Procedures Tools and Personnel Test 1: X-Cut Tape Test Test 2: Patch Test Before Application information Maintenance

#### Documentation:

- Lead Paint Surface/Substrate Assessment Form
   Encapsulant Maintenance Form (management plan)







#### SURFACE PREPARATION FOR X-CUT TESTS

- General cleaning
- · Surface repairs
- De-glossing
- Mold/mildew removal
- Surface priming



#### TEST 1: X-CUT TEST (TESTING THE SUBSTRATE)

- 1. Clean surface
- Use a utility knife and make two (2) straight cuts in the paint film down to the substrate. These cuts must be about two (2) inches long, intersecting near the middle to form an "X". DO NOT cut into the substrate.
- 3. Inspect the cuts to establish that the paint film has been penetrated to the substrate. If not, repeat steps 1 and 2 in a different location. DO NOT attempt to deepen a previous cut.
- 4. Take a 3" length of tape and place the center of the tape at the intersection of the cuts.
- 5. Smooth the tape into place over the "X" and rub the tape firmly.
- $\begin{array}{ll} {\rm 6.} & {\rm After} \ 90 \ {\rm seconds, remove \ the \ tape \ by \ pulling \ straight} \\ {\rm down \ with \ a \ quick \ smooth \ motion.} \end{array}$

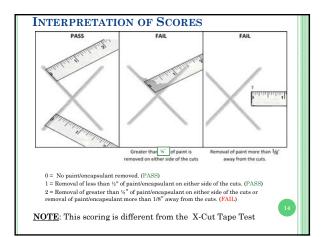


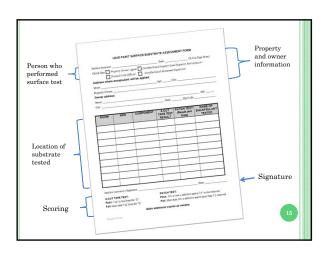
# INTERPRETATION OF SCORES FAIL FAIL Greater than 1/g/ of paint is removed on either side of the cuts Removal of paint more than 1/g/ average from the cuts.

#### TEST 2: PATCH TEST (TESTING THE ENCAPSULANT)

- 1)Apply the test patch of encapsulant.
- $^2)\rm{Examine}$  the patch for bubbling, cracking, and any other defects. If more than 10% of patch is defective, it FAILS. Do not continue.
- 3)Use a utility knife and make two (2) straight cuts in the patch of encapsulant into the paint film down to the substrate. These cuts must be about two (2) inches long, intersecting near the middle to form an "X". DO NOT cut into the substrate.
- $4) In spect cuts with flashlight to establish that the encapsulant and underlying paint film have been penetrated to the substrate. If not, repeat steps <math display="inline">1{\text -}3$  in a different location. DO NOT attempt to deepen a previous cut.
- $5) {\rm Take}$  a 3'' length of tape and place the center of the tape at the intersection of the cuts. Rub firmly.
- $6)\mbox{After }90$  seconds, remove the tape by pulling straight down with a quick smooth motion.







Licensed Lead
Abatement
Contractors must
keep log of X-cut
and Patch test



WHERE TO FIND REGISTRY AND APPLICATION & MAINTENANCE OF LIQUID ENCAPSULANT MANUAL

All of the following documents can be found on <a href="https://www.ct.gov/dph/lead">www.ct.gov/dph/lead</a> under the heading "Lead Abatement Guidance Document"\*





LEAI	) PRA	ACTI	TION	IERS

- Who are they?
- •Where can I find them?
- What do their Certificates or Licenses look like?
- •Why is it important?

2

# WHO ARE THEY? •In Connecticut Two types of Practitioners Regulated ✓ Licensed ✓ Certified

1

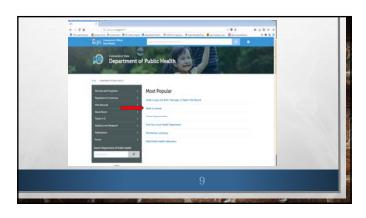


# \*Licensed Lead Abatement Contractor \*Licensed Lead Consultant Contractor 5



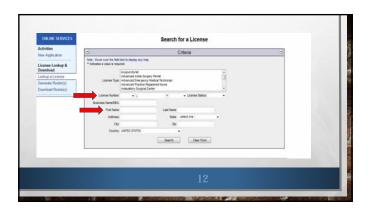


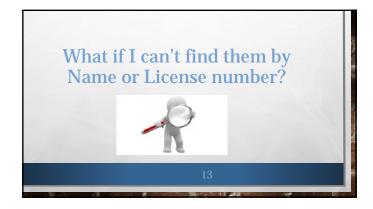


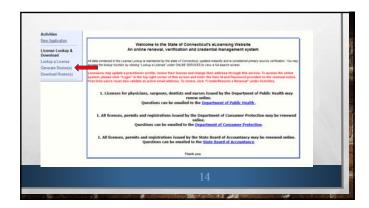








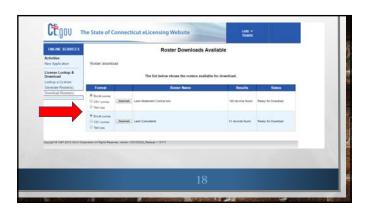






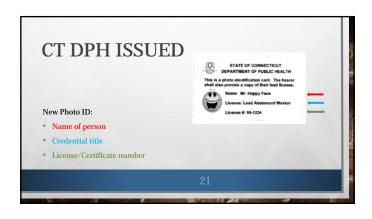


















IT IS IMPORTANT TO KNOW	
Inspection on Lead Abatement job site:	
Check All Licenses and Certifications	
Document:	
Companies License number and name	ł
All individuals on site	ł
i. Certification numbers	l
ii. Expiration date on their Training Course certificate	l
**Must be Licensed or Certified to be in/on an active Lead Abatement site	
25	

WHO ELSE CAN DO LEAD ABATEMENT IN CT?	
HOMEOWNERS – IN THEIR OWN HOMES	
But is not encouraged!	
26	





- 1.Child Care Center and Group Child Care Center
- 2.Family Child Care Home

CHILD CARE CENTER
AND
GROUP CHILD CARE CENTER

#### Child Care Center/Group Child Care Center

- New Center
  - Comprehensive lead inspection required (paint, dust, water, soil)
  - Prior to opening
  - Conducted in all approved areas (interior, exterior and common areas)
  - Completed by DPH Licensed Lead Consultant
  - Identifies where lead is
    - Intact = lead management plan
    - Defective = lead remediation plan



#### Child Care Center/Group Child Care Center

- Existing Center
  - Comprehensive lead inspection should be on file
    - Any missing components must be completed
      - Missed areas
      - New room(s)
  - Completed by DPH Licensed Lead Consultant
  - Identifies where lead is
  - Intact = lead management plan
  - Defective = lead remediation plan



#### Child Care Center/Group Child Care Center

- LHD's Role(s)
  - Review Lead Hazard Remediation Plan
    - Lists all area(s) where lead hazards were identified and how they will be remediated
    - Remediation must be completed by an EPA RRP Certified Firm
    - Must be approved by LHD before work can begin
  - Review Lead Management Plan
    - Lists all area(s) where intact lead is
      - Including areas that were remediated (paint and soil)
      - Must be approved by LHD at completion of remediation (if needed)

#### Child Care Center/Group Child Care Center

#### ■ LHD's Role(s)

- Completion of work
  - Clearance dust wipes must be conducted (by a DPH licensed lead consult or LHD)
    - Confirm all clearance dust wipes pass
  - Perform a visual inspection confirming work is complete
  - Issue a letter of compliance
    - Provide a copy to Center Operator, DPH and OEC
  - Center Operator must retain copies of all information on file

FAMILY CHILD CARE HOME WITH A CHILD < 6 RESIDING

# Family Child Care Home with a child < 6 residing



- OEC staff
  - If a dwelling built before 1978, take a paint chip sample
  - Paint chip sample sent to DPH Lab
  - Negative for lead
  - No further actions
  - Positive for lead
    - Triggers 19a-111 regulations (Non EBLL case)
      - Abatement of all defective surfaces

# Family Child Care Home with a child < 6 residing

#### ■ LHD's Role(s)

- Conduct a comprehensive lead inspection
- Issue order for lead abatement
- Review Lead Abatement Plan
  - Abatement must be completed by a DPH Licensed Lead Abatement Contractor
  - Must be approved by LHD before work can begin
- Review Lead Management Plan
  - Lists all area(s) where intact lead is
    - Including areas that were abated (paint and soil)
    - Must be approved by LHD at completion of abatement

Family Child Care Home with a child < 6 residing

#### ■ LHD's Role(s)

- Completion of work
  - Clearance dust wipes must be conducted
  - Confirm all clearance dust wipes pass
  - Perform a visual inspection confirming work is complete
  - Issue a letter of compliance/post abatement inspection report
    - Provide a copy to Provider, DPH and OEC
  - Provider must retain copies of all information on file

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FAMILY CHILD CARE HOME WITH <u>NO</u> CHILD < 6 RESIDING

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#### New Rule

- If limited surface area
  - Less than 6 square feet of defective paint on the interior
  - Less than 20 square feet of defective paint on the exterior
    - Not required to test <u>first warning</u>
  - Provider must develop a corrective action plan to stabilize defective painted surfaces
    - OEC must visually verify painted surfaces have been made intact
- Remember, no child < 6 resides

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### Family Child Care Home with a <u>no</u> child < 6 residing

- OEC's Role(s)
  - If a dwelling built before 1978, has more than limited surface area defective
  - Take a paint chip sample
  - Paint chip sample sent to DPH Lab
  - Negative for lead
  - No further actions
  - Positive for lead
    - Must have a comprehensive lead inspection conducted by a DPH Licensed Lead Consultant
      - Conducted in all interior, exterior and common areas
      - Completed by DPH licensed lead consultant

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## Family Child Care Home with a <u>no</u> child < 6 residing

- Provider must submit
  - Lead Hazard Remediation Plan to DPH
    - Lists all area(s) where lead hazards were identified and how they will be remediated
    - Remediation must be completed by an EPA RRP Certified Firm
    - Must be approved by DPH before work can begin
  - Lead Management Plan
    - Lists all area(s) where intact lead is
      - Including areas that were remediated (paint and soil)
      - Must be approved by DPH at completion of remediation

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### Family Child Care Home with a <u>no</u> child < 6 residing



- DPH's Role(s)
  - Review Lead Remediation Plan
    - Remediation must be completed by an EPA RRP Certified Firm
  - Must be approved by DPH before work can begin
  - Review Lead Management Plan
    - Lists all area(s) where intact lead is
      - Including areas that were abated (paint and soil)
      - Must be approved by DPH at completion of remediation

# Family Child Care Home with a <u>no</u> child < 6 residing



- DPH's Role(s)
  - Completion of work
    - DPH Licensed Lead Consultant
      - Conduct clearance dust wipes testing
      - Confirm all clearance dust wipes pass
      - Perform a visual inspection confirming work is complete
      - Issue a letter of compliance/post abatement inspection report
      - Provide a copy to Provider, DPH and OEC
    - Provider must retain copies of all information on file

19

<ul> <li>Itsuing por</li> </ul>	it remediation letters	of compliance for Chit	d Care Centers,	Girnugi Child Ca	re Hones and	Family Child Care Ho	ives when no slidd	en 46 years of age	resides.
Child Care Licensing Types	A comprehensive lead impaction is required for initial licensure	Paint chip sampling will be conducted by OEC of any defective paint is present unless prestructly tested	Lead abstement is required (if lead hazards present)	Leaf remedation is required (if leaf hexards present)	Lead absternent plan is required	Leed management plan is required for intest leed surface	A post visual inspection and clearance dust wipes are required	A post remediation letter of compliance is required	A post abatement impaction report/letter of compliance is required
Child Care Centers (3 or man (Million (30 QTRs 7/(MIX)	х	×		x		х	х	x	
Group Child Care Homes For LT (Million (SIE \$5% 77(x)(3)	x	x		x		x	x	x	
Femily Child Care Homes (hild < 6 resides)		×	x		x	×	×		×

#### Contact:

■ Kimberly Ploszaj

Contact <u>kimberly plossalifict gov</u> if you need further assistance.

- Epidemiologist
- **(860)** 509-7959
- kimberly.ploszaj@ct.gov



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#### <u>Local Health Department:</u>

DCF Lead Paint Assessment Protoco



#### **Current Protocol**

#### DCF protocol:

- o DCF staff does not collect paint chips
- **Presume** that deteriorated surfaces in pre-1978 homes contain lead-based paint
- Correct these surfaces using lead-safe work practices

#### Current protocol

#### Application to renew or become a Foster Home

- o Include LR&HHP developed documents:
  - Are There Potential Lead Hazards in My Home?
  - Next Steps Guidance for Deteriorated Paint for Foster Home Applicants

#### **Are There Potential Lead** Hazards in My Home? W W W Guidance for DCF Foster Home Applicants Does the DCF require a site visit? Yes, a site visit is performed when you apply to become a licensed foster care to renew your license. During this site visit, the DCF worker will visually verify the paint condition. OCF wants to ensure the health and safety of every child that is placed in a loster home. In an effort to achieve this, your home will be need to have all leteriorated paint corrected prior to DCF licensure. You should have NO deteriorated painted surfaces! deteriorated painted surface is considered to be chipping, peeling, flaking, rumbling paint coming off of any painted surface of your home. My home has deteriorated painted surfaces, now what? If your home was built before 1978, prior to a site visit by a DCF worker, you hould repair and repaint the deteriorated surfaces using lead-safe work

Next Steps Guidance for Deteriorated Paint in Homes Built Prior to 1978 for Foster Home Applicants

Chipping, peeling paint on the interior or exterior parts of your home was identified by the DCF case worker and your home was built prior to 1978. Prior to becoming a licensed foster home the chipping peeling paint will need to be corrected. You will need to contact your local health department who will help you develop a lead hazard remediation pion PBIOS to work beginning. Beginning the work without the approval of the local health department will peopardize your foster home application with DCF. DCF will NOT license your home without a letter of compliance from your local health department.

- 1. DCF will notify the local health department of the locations of the deteriorated painted surfaces on the interior
- If you own the home and it is a single family dwelling, you can either correct the deteriorated painted surfaces
  yourself using lead safe work practices, or hire an EPA certified Renovation, Repair, and Painting (RRP) firm.
   Directions on how to find an RRP firm are attached.

OR

If you live in a rented dwelling (single family or multi-family), the property owner must be notified by DCF of the deteriorated paint. DCF will also notify your local health department. The property owner <u>must</u> either become an EPA certified RRP firm or hire one, in order to correct the deteriorated painted surfaces in a lead-safe manner

#### What are the next steps?

- DCF reviews and processes the foster home application
- Schedule site visit



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# What happens during the site visit?

- DCF performs site visit
  - Homes built before 1978
    - Verify paint condition
      - ✓Intact surfaces
        - □Continue with application process



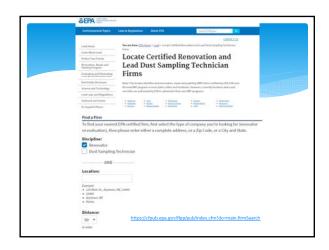
8

#### What if there is defective paint?

- o Defective paint
  - DCF will provide the applicant again with the "Next Steps Guidance for Deteriorated Paint for Foster Home Applicants."
    - Single –family owner occupied
      - ✓ Property owner can correct deteriorated surfaces
      - ✓ Hire an EPA certified Renovation, Repair and Painting (RRP) Renovator







#### What if it is a rental property?

- Rented Dwelling (single or multi-family)
  - Property owner and LHD must be notified by DCF
  - Property owner can become an EPA certified Renovator and Firm
  - Hire an EPA (RRP) Renovator







How is defective paint documented?

 DCF will document defective paint using the "Identification of deteriorated painted surfaces" sheets



											estii	atilli	
1				DI	TERIORATED P	AINTED SUR	BFACES ON T	THE INTERIOR					
ROOM (differentiate between similar rooms with a description)	Wall	Floor	Base- board	Door	Door Casing/Jamis	Window	Window	Window Component	Stair Tread	Stair Riser	Ceiling	Chair Rail	Other (List):
ledroom	$\vdash$			-						1			
ledroom				+						+			
edroom				-				-					
iving room		-		+						1			
lathroom		1											
lathroom	-	-	_	+						_			

# How does DCF notify Local Health Departments?

- o DCF will complete "DCF Notification Letter to Local Health Department"
  - Include Identification of deteriorated painted surfaces sheets

A.

DCF Notification Letter to Local Health Department
[when deteriorated paint identified at property built prior to 1978 during initial site visit)
[Diele]

Bocal health department name)
[Address]
[Town], CT [pigcode]

Dear Local Health Department,
On [insert diele], I conducted a site visit at [insert idefires] in response to a foster home application submitted to the Department of Children and Families. During the site visit, I identified areas with Original/preining paint, I provided the applicant, Ilientified areas graphically with a fact better estables, Need Strept Guidance for Deteriorated Paint. The circumstances of the home are as follows:

No child/innel under the age of six years are in residence

Single or multifamily exemple determing, an EPA certified 88P renovator must perform the work\*.

Childyren] under the age of all years in residence

Single or multifamily family graphic develing, applicant is allowed to perform the work\*.

Single or multifamily family graphic develing, applicant is allowed to perform the work\*.

\*Areas where work is performed must undergo clearance dust wips testing.

# What does the Local Health Department do?

- Provide guidance to property owner
  - Verify defective surfaces according to "Identification of Deteriorated Surfaces" sheet(s)
  - Assist property owner complete the Model Lead Hazard Remediation Plan (if necessary)
  - Approve Remediation Plan

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# 

After the work has been completed...

LHD can take clearance dust wipes

or

Refer property owner to a DPH Licensed Lead Consultant (see "Who to Hire for Clearance Sampling")

..

To find a Connecticut Lead Consulting Professional
Go to https://www.elicense.ct.gov/Lookup/GenerateRoster.aspx
Scroll down and click on Lead Consulting and Abatement Professionals
♣Home Improvement Contractors/Inspectors
+Lead Consulting and Abatement Professionals
+Liquor - Commercial (Manufacturing, Shipping, Distribution and Brands)
Check the box next to Lead Consultants
-Lead Consulting and Abstement Professionals
□Lead Abstement Contractors (No Fee Required)   If Lead Consultants (No Fee Required)   If Lead Consultants (No Fee Required)
Scroll down to and click on Continue. You can download to Excel, CSV or Text files.  9

### What happens after samples have been tested?

- Receive acceptable clearance sample results
- oLHD conducts a visual assessment
- LHD completes and mails compliance letter template to DCF

20



Final Steps
DCF receives compliance letter from LHD
Continue with DCF Application Process

HUD	LEAD	SAFE	HOUSI	NG
RULE	AME	NDME	VT	





#### LEAD SAFE HOUSING RULE AMENDMENT

- January 2017 HUD modified the Lead Safe Housing Rule (LSHR) to enhance the protections from lead hazards that the current regulations provide
- Amendment compliance by July 13, 2017

#### 2

#### **KEY CHANGES**

- Revising HUD's definition of elevated blood lead level (EBLL)
- 2. Enhancing the level of inspection protocol for a unit with a child with an EBLL
- 3. Following state or local government requirements that have established more protective standards



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- •In 2012, the CDC lowered its reference value for lead in the blood of children under age six to five micrograms per deciliter
- •Consistent with CDC's guidance, HUD is now using the reference value of five micrograms per deciliter to identify children with an EBLL

#### 2. UPDATED INSPECTION PROTOCOL

- •The LSHR amendment requires that an environmental inspection occur in a unit:
- receiving tenant based rental assistance, such as Section 8
- where a child under the age of six resides
   with an EBLL greater than or equal to five micrograms of per deciliter

#### 2. UPDATED INSPECTION PROTOCOL

- •HUD's environmental inspection includes:
- •a lead risk assessment
- •the completion of a questionnaire
- •Table 16.2 Guidelines for Questions to Ask Regarding a Child's Environmental History, as advised in the Guidelines for the Evaluation and Control of Lead-Based Paint Hazards in Housing (2012 Edition)

#### 3. FOLLOWING CT STANDARDS

- •There are several key differences in definitions and response requirements between HUD and Connecticut
- •HUD requires that, if a state or local government establishes more protective standards, that housing authorities follow those standards

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## WHAT'S DIFFERENT IN CONNECTICUT?



#### WHAT'S DIFFERENT IN CT?



- If <u>defective</u> lead-based paint surfaces or <u>bare soil areas</u> with hazardous levels of lead are identified during a HUD risk assessment
- CT lead regulations are triggered!
- This <u>requires a comprehensive test</u> of the dwelling unit in which the child resides



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- •This also <u>requires that any other dwelling units</u> (e.g. other apartments) within the same building, where a child less than 6 resides, have a comprehensive inspection
- •CT regulations are more strict
- HUD requires under this amendment that if a state has a more strict approach, that the PHAs must follow that procedure



#### PHAS AND LEAD INSPECTIONS

Best practice approach:

 PHAs, housing firms or towns can develop a relationship with the local health departments and hire them to complete the required lead inspection (if resources are available)



• PHAs, housing firms or towns can hire a DPH licensed lead consultant

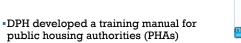


#### RESOURCES AND TOOLS



CIRCULAR LETTER 2018-08	
PH)	
Lead	
Safe	
Housing	
Rule	
Amendment	
Supplemental	
Materials	
Plb March 2017	
https://portal.ct.gov/DPH/Environmental-Health/Lead-Poisoning-Prevention-and-Control/-/media/Departments- and-Agencies/DPH/dph/orwironmental_health/lead/circular_letters/2018/201808-DPHs-Response-to-the-LSHR- Amendment.pdf	

#### TRAINING MANUAL



\*DPH has co-presented, with HUD, at several training sessions for PHAs



#### THE GOALS

- •To ensure that PHAs are following the more strict requirements in CT
- •To limit an increase workload for LHDs
  - •Once 19a-111 regulations are triggered, LHD must respond
  - •LHDs are <u>not required to perform</u> the lead inspections



DATA	SHARING	
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#### DATA SHARING

- Data may only be obtained from DPH, not from a local health department
- Data may only be obtained if PHA has a confidentiality/data sharing agreement with DPH
- DPH reports any matched EBLL data to the PHA quarterly







#### DATA SHARING AGREEMENTS

- To date, we've executed confidentiality/data sharing agreements with 12 PHAs (3 new PHAs will report during this upcoming quarter), 1 housing firm and the Department of Housing
   PHAs were selected based on the amount of housing choice vouchers they administer and the town having the availability of HUD funding for property owners
- Due to staffing limitations, DPH was not able to move forward with executing confidentiality/data sharing agreements with all PHAs statewide
  DPH will continue to work with HUD's Region 1 Office in hopes to obtain a 100% of the housing choice voucher address data
- $^{\bullet}$  The existing confidentiality/data sharing agreements capture approximately 79.7% of all of the housing choice vouchers in CT

#### TOTAL MATCHES/EBLLS BY QUARTER

Timeframe	Total Number of Lead Confirmed EBLL of ≥ 5 µg/dL	Total Number of Confirmed Data Matches	Percentage of Children Residing in Subsidized Housing with a Confirmed EBLL of ≥ 5 µg/dL
7/1/17 to 6/30/18	1541	44 (unique children)	49/1541 = 2.9%



#### CONTACT INFO:

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Epidemiologist
State of CT Department of Public Health
Lead, Radon and Healthy Homes Program
(860) 509-7959
kimberly.ploszaj@ct.gov



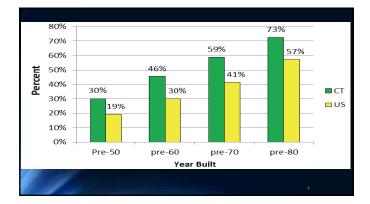
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Lead Poisoning Preventior 19a-111-1 through 19a-111	n and Control Regulations -11		
19a-111-1 through 19a-  • Definitions  • Applicability of regulations  • Regulatory response protocols  • Notification  • Abatement approval  • Abatement of lead	-111-11  • Methods of abatement  • Time periods for compliance  • Post abatement inspections  • Worker protection  • Occupant protection		
Containment			







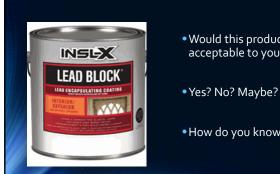


Un-Licensed and/or Non-Certified Work Practices

# Problems we've seen: Uncertified • lead abatement workers • lead abatement supervisors • lead inspector/risk assessors • lead planner/project designers Unlicensed Unlicensed Non-Certified Work Practices • RRP firms • home improvement contractors

• lead consultant contractors

# Liquid Encapsulant



- Would this product look acceptable to you?
- How do you know?

#### Liquid Encapsultants

- All liquid encapsulants must be approved by DPH
- Although other products are sold, and even approved by HUD, they MUST be approved by DPH
- All approved encapsulants are listed on the "Lead, Radon and Healthy Homes Program Registry of Authorized Encapsulant Products"

Reporting	

#### PART I- EXECUTIVE SUMMARY

A combined Lead-Based Paint Inspection and Risk Assessment was performed at

The combined Lead-Based Paint Inspection and Risk
Assessment was performed for the Lead Action for Medicaid Primary Prevention (LAMPP)
Program on September 10, 2014. A historic review letter has been sent to the Connecticut
Commission on Culture and Tourism and the results are pending. The site building consists of a single-family residential building.

Three (3) children under six (6) years old resided in the dwelling at the time of inspection. The State of Connecticut Lead Poisoning Prevention and Control Regulations (19a-111-1 through 19a-111-11) along with U.S. Department of Housing and Urban Development (HUD) and U.S. Environmental Protection Agency (USEPA) regulations apply to the site building. None of the children had an Elevated Blood-Lead Level (EBLL) at the time of inspection; however, two (2) of the children had levels that at or above the level of concern, which is 5 µg/dl set forth by the United States Centers for Disease Control and Prevention (CDC).

EXTERIOR Lead-Based Surfaces	Foundat	ion Siding a	Sta	airs &/or air omponents	Porch & Porch Compon	8.1		Window &/or Tri	n G	iarage &/or larage components	
Deteriorated		V		<b>V</b>	V	G	7	7			4
Intact			-								
INTERIOR Lead-Based Surfaces	Floors	Baseboards	Walls	Ceilings	Stairs &/c Stair Compone	8/0	e l	Windows &/or Trim	Cal	set/ binet mponents	
Deteriorated		<b>V</b>	Ø			7	10	<b>V</b>		<b>V</b>	
Intact (X = positive lo		✓									
B. Indicate Peak Values (Check All That Apply)		Lead Ha	ns .		Window Sills	Window Wells	So	oil W	/ater	Paint (XRF)	Paint Chip
Was dust tested for lead:  ☑ Yes ☐ No							Ι.		n/a	+9.9 mg/cm2	n/a
Yes No Was soil tested for lead? Yes No		(Enter hi		1,000 mg/mg N	2,700 mg/sq.ft	n/a	1.5	n/a i	ı/a		11116
Yes No Was soil tested for lead?	ound frozer	result fee	each)		2,700 mg/u <sub>0</sub> .h	Û	+		te the t	table above.	100

#### Failure to Report

- Toxic levels of lead were found that require lead abatement
- CGS 20-478, require licensed lead consultants to comply with the 19a-111 regulations
- The company violated the regulatory requirement that when an inspector "finds a toxic level of lead requiring abatement, the inspector shall report this to the <u>owner</u>, <u>local director of health</u>, and the commissioner"



EPA Renovation, Repair and Painting Rule (RRP)

#### What is the RRP Rule?

The RRP Rule:

- establishes requirements for companies and individuals performing renovations
- affects contractors, property managers and others who disturb painted surfaces
- applies to work in houses, apartments and child-occupied facilities built before 1978
- includes pre-renovation education requirements

#### When Does the RRP Rule Apply?

- Anyone who is paid to perform work that disturbs more than 6 square feet of paint on the interior or 20 square feet on the exterior, of a house or childoccupied facility, built before 1978 must be certified
- Rent = COMPENSATION



#### What activities are covered?

- Remodeling and repair
- Maintenance
- Electrical work
- Plumbing
- Painting preparation
- Carpentry
- Window replacement



#### How to Become Certified

#### Companies = CERTIFIED FIRM

- Register on EPA's website
- Costs \$300
- Valid for 5 years

#### Individuals = CERTIFIED RENOVATOR

- Take an 8 hour class
- Costs vary between \$150-\$300
- Valid for 5 years

















# Regulations The following regulations may be used to order correction of a nuisance: • 19a-206 • 19-13-B1 • 19-13-B2 • 47a-52 (tenement housing – nuisance) • 47a-54f (tenement housing – paint nuisance)



www.epa.gov	Helpful Websites:		
	•www.ct.gov/dph		
www.osha.gov	•www.epa.gov		
	•www.osha.gov		

Name of Program City of Bridgeport	Contact(s) Audrey Gaines – 203 576-7131	Town(s) Covered	Town(s) Covered	
		Bridgeport		
CT Children's Healthy Homes Program	Chris Corcoran – 860 837-6242	Danbury No East Hartford Sta East Haven Tor Enfield Wi Hartford Wi Manchester Wi	w Haven rwalk mford rington sterbury est Haven nchester ndham	
Naugatuck Valley Health District (CT Children's Healthy Homes Program)	Carol Slajda — 203 881-3255	Beacon Falls Se	rugatuck ymour elton	
City of New Britain (CT Children's Healthy Homes Program)	Chris Corcoran - 860 837-6242	New Britain		
City of Hartford	Arlene Robertson – 860 757-4773 Jeserika Figueroa – 860 757-4720	Hartford		
City of New Haven	Paul Kowalkski – 203 946-8173 Jennifer Sanjurjo – 203 946-7420	New Haven		
City of Norwich	Wayne Sharkey - 860 823-3770	Norwich .		
City of New London	Tom Bombria - 860 437-6346	New London		
City of Waterbury	Francis Ford = 203 576-6786 Richard Lee = 203 346-3903	Waterbury		

