

Lead Abatement Trainer Newsletter

Michigan Department of Community Health Healthy Homes Section (HHS)

Concerns with Multi-Family Projects:

In 2010, the City of Detroit amended the Detroit Property Maintenance Code and added what is commonly referred to as the Detroit Lead Ordinance. As a result, many more multi-family Lead Inspection and Risk Assessment combinations are being performed. The following is an excerpt from an article by Jeremy Westcott, of Environmental Testing and Consulting (ETC), addressing some issues he has seen. It applies mainly to those teaching Inspectors and Risk Assessors, but Supervisors need to be able to recognize and utilize good reports as well.

Assessing Units Needed:

When performing multi-family combinations, the number of units that need to be sampled for inspections can be taken from the chart in the HUD Guidelines

(Table 7.3) and then randomly selected. These same units may also be used to perform risk assessments.

However, ETC has seen some reports that use the number of required units for risk assessments from the targeted or worse case chart (Table 5.6) and are still using the randomly selected unit numbers (just fewer of them). As the worst case and targeted method allows you to do many fewer units, it is very tempting to use this chart; however, it is critical that you document and follow the requirements of these methods if you are going to try and use Table 5.6. You can't use Table 5.6 with random selection or with worst case sampling. Also, please note that by doing targeted or worst case analysis you are rating the entire complex based upon the worst units which is not always in the building owner's best interest.

Determining Hazards:

In single family housing, each

lead painted surface that is in poor condition is a hazard (on a room-by-room basis). However, it is much more complicated in multi-family housing. As we are only testing a representative sample of the total units, you have to account for this when listing hazards. Therefore, a lead painted window casing in the living room of Apartment 214 does not represent only this apartment but all other untested apartments.

Therefore, you can't just say "fix the window casing on side B of Apartment 214" but rather would have to recommend something like "window casing in the living rooms of all apartments must be reviewed and any found to be in poor condition are considered to be hazards and must be addressed". It is critical to remember that you are only testing a portion of the total, but it also represents all other untested units.

More of this article will appear in the next issue.

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Volume 1 Issue 2

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From the Certification Desk:

Certified Contractor Info

It is imperative to explain to students the need to be certified abatement contractors, or work for a certified abatement contractor, in order to do lead abatement work. Make clear the requirements needed to be an abatement contractor and give them a copy of the contractor application..

Certification Fees Per Cycle

Historically, students receiving initial certification between April 1 and September 30 pay the full certification fee. From October 1st to March 31st, they pay half the fee. From now on, from March 1st, we will accept the full payment of \$150 and they will be certified though the following

March 31st.

Between January 1 and the end of February you may tell your students that they may send in fees to cover the partial year and the next full year. For example, if someone completes the Supervisor class on January 15, he/she would need to pay the \$25 application fee, the \$75 exam fee, and the reduced

certification fee of \$25. You may propose to them that if they pay an additional \$50 (for a total of \$175), they would be certified through March 31st of the following year, but do not make this offer before January 1st, because it causes issues with the database.

Hands-On Activity of the Year Award

Many trainers struggle to come up with sufficient hands-on activities. The Healthy Homes Section (HHS) wants to acknowledge those that creatively come up with activities that engage the students and also teach, or re-enforce, the lesson objectives. The November 2011 award for excellence in training goes to Monica Starks of Myleadtraining.com. Monica describes the activity below:

This year, Myleadtraining.com added another game. Monica Starks took this one directly from reality TV... SURVIVOR. We call it SURVIVOR LBP.

Just like on TV, there are physical challenges as well as intellectual challenges. The class is divided into teams

and the challenges are divided into three rounds. At the end of the first two rounds the students on each team must vote players off. During rounds 1, and 2 the teams compete against each other. At the end of each round, Tribal Council is held and players are voted off. The students have to consider carefully whom they choose to vote off. Players that are voted off become members of the Jury, which decide the winner of the game. The Jury must watch all challenges so that they will have the information necessary to choose the final winner. In round 3, the teams are combined and must complete one final physical and intellectual challenge. There are no losers in Survivor LBP. Everyone wins candy, the information previously learned is reinforced,

and the students are engaged and have a lot of fun.

“At Myleadtraining.com, we want students to complete the course with an understanding of Lead-Based Paint practices. We believe nothing drives that understanding better than reality based challenges that are also fun, exciting and memorable.”

Congratulations Monica and thank you for your efforts.



Dust Wipes Issues:

Issues have arisen regarding improper or inaccurate measuring for dust wipe samples. While the HUD Guidelines mention using tape on the floor to mark out a 1 square foot area, the ASTM Standard E 1728–03 only indicates using tape to hold a template down, or to delineate the wipe area on a windowsill or trough. Since, the HUD Guidelines have had no revisions since 1997 and most of the Guidelines have not been addressed since 1995,

the Healthy Homes Section (HHS) has determined that if there is a conflict in procedures between an ASTM Standard the HUD Guidelines, the HHS will enforce the ASTM Standard. It should be taught that a template is pref-

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ASTM Standards can be found at www.astm.org

erable to tape for dust wipe samples taken on floors.

Observations in the field have seen some measurements that are off by up to a half an inch on a side. If levels of lead dust were close to the standard, then the samples could easily result in false positives or false negatives.

Disposable templates can be made or purchased. Reusable templates may also be used, but stress that they need to be cleaned before each sample taken.

Risk Assessment Topics:

Homeowner interviews:

The purpose of the “homeowner interview” is to establish where children spend most of their time and where they may most likely encounter lead hazards in the home or yard. It is an important tool for informing where to take dust and soil samples and shouldn’t be taken lightly or done just to fulfill a procedural requirement. The risk assessor needs to determine where the children eat, sleep, play inside, play outside, and otherwise spend a lot of time in or around the home. When

training, please stress the importance of the homeowner interview.

HUD form 5.0 may be used. The form is not required, but the information it requests is. Risk Assessors can develop their own form, and may ask for more information, but they cannot eliminate questions on HUD form 5.0.

Dust wipe samples:

In 2005, Michigan changed the Lead Hazard Control Rules to require that six rooms need to be sampled by taking dust wipes. Students in refresher classes should be reminded of this.

Soil sampling:

Make it very clear that soil should be sampled for Risk Assessments. If there is no bare soil sampling is not required, but that should be the exception not the rule. Please explain to your students that if no soil samples are taken, then there should be some explanation in the narrative of the Risk Assessment Report as to why they did not take any soil samples. Also, make it clear that customers, agencies, cities, counties, environmental companies, etc. can not tell Risk Assessors to eliminate the requirement for taking soil samples.

Refresher Training:

The goal of refreshers is to review subject matter for the State exam and discuss topics that have changed over 3 years, but refreshers are also intended to review work practices to provide consistency and uniformity among all certified professionals. Though hands-on activities for refresher classes are not required by regulations, it has been observed by the department that there is too much variability in some work practices. Mostly these relate to Inspectors and Risk Assessors activities. Two issues will be addressed here.

1. Dust wipe sampling: In the field a wide variety of wipe techniques have been observed. Some wipe the area twice and some three times. Some rub vigorously and some softly. To insure

uniformity please purchase and use the ASTM Standard E 1728–03 for teaching and reviewing dust wipe sampling. Have students practice dust wipes as part of the refresher training. Have them do more than one dust wipe. Watch them do wipes. If they don't do them correctly, then make them repeat until they exhibit proficiency. Perhaps have students demonstrate how they do dust wipes and let them critique each other, then model the proper methodology if there are issues.

2. Paint conditions: Much variability is also observed in determining intact, fair and poor paint conditions. There is no ASTM Standard for determining paint conditions, so proper procedures are found in the HUD Guidelines

(Chapter 5-11 to 5-15), and information from HHS. The department has developed a presentation to help teach paint conditions. It is located at www.mi.gov/leadsafe > **Lead Professionals** > **EBL Environmental Investigators** > **A Lead-Based Paint Condition Identification Tutorial**.

Some Risk Assessors call almost everything “**paint in poor condition**” just in case, and that results in more hazards, drives up abatement costs, and isn't an accurate portrayal of the property. Using the tutorial or other means, work with the students to get them to the point where they understand and are in agreement about how to determine the different paint conditions.

Pre-Renovation Education Rule (PRE):

The Pre-Renovation Education Rule (PRE) requires that a copy of the “Renovate Right” pamphlet be handed out before any renovation begins and a signed document demonstrating receipt by the resident must be obtained and retained for three years.

HHS was authorized by the EPA in 2008 to administer PRE in Michigan. Michigan does not have authority to enforce Renovation, Repair and Painting (RRP) work practice rules on renovation projects, but through PRE, the

State can enforce the handing out of the “Renovate Right” pamphlet on renovation projects.

Enforcement of PRE has been done primarily through random mailings to licensed builders asking for records documenting compliance with PRE, and by tips and complaints from homeowners, local



governments, and contractors.

While the Department can't enforce RRP, the Department, under PRE, can enforce the education requirements. Violations and/or citations can be, and have been assessed for failure to:

1. Hand out the pamphlet
2. Get the residents signature
3. Retain documentation for three years.
4. Failure to provide records upon request.

Exam Issues:

Change is coming! The Healthy Homes Section is in the process of changing the State lead certification examinations. Currently about 30% of the supervisor exam questions are related to OSHA issues. Observations from auditing training classes indicate that between 30% and 40% of class time is devoted to teaching OSHA related issues. Since HHS does not enforce OSHA rules, the Section has determined the focus for exams should focus more on Lead Abatement laws and regulations that are enforced by the

department. The goal will be to reduce the OSHA-related exam questions down to 18% to 20% of the questions on the exams.

Change is coming!

The emphasis in training should be that the students are able to perform lead abatement activities correctly when they are finished with their training.

All exams will be affected, but changes will be more obvious on the Supervisor

and Worker exams.

The Healthy Homes Section will provide notification in advance of the introduction of the new exams. These changes in the exams may require you to modify your curriculum or the amount of time spent on various topics. The goal is not to eliminate training topics, but adjust the time taught and focus more on abatement. The Healthy Homes Section will also provide guidance on what is expected in the way of learning objectives.

Michigan Department
of Community Health



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**Healthy Homes Section
Mission Statement**

To improve the health and wellbeing of Michigan citizens by promoting safe and healthy home environments through comprehensive home-based intervention programs, lead certification and regulations, public education and outreach, and statewide partnerships.

Parting Words Regarding Exterior Poly:

Recently, two trainers stated in Worker/Supervisor classes that for exterior abatement work, plastic need only extend out 5 feet per story of the house. In the context of the class, it appeared they were saying the 5 feet applied to all exterior work. **HUD Guidelines Chapter 8 table 8.2 Exterior Worksite Preparation Levels (Not Including Windows)**, states, "One layer of plastic on ground extending 10 feet beyond the perimeter of working surfaces." In **HUD Guidelines Chapter 8 table 8.3, Window Treatment or Replacement Worksite Preparation** it states, "One layer of plastic sheeting on ground or floor extending 5 feet beyond perimeter of window being treated/replaced."

Looking at these two tables, the conclusion is that the nature of the job determines how far the plastic must extend from the house. It is very important that you make this clear in class. If a job involves only window work, and they are working from the exterior, then 5 feet may be adequate, however if 5 feet is not collecting all



the chips, dust, and debris, then it is not adequate and sufficient plastic must be used to collect all chips, dust, and debris. If they are doing any other exterior work or window work in conjunction with other work such as siding, doors, soffits, painting, etc., then 10 feet per story is required. The goal is that no lead-based paint contamination reach the ground around the house.

The HUD Guidelines are the minimum requirements for work practices. Citations can still be assessed if the minimum required amount of plastic is not sufficient to contain all the chips, dust, and debris generated by the abatement work.

The Healthy Home Section is looking for your input to make this newsletter a helpful and useful resource for training providers and certified lead professionals. In this edition, we had articles from two training providers and we would like additional articles from trainers and certified lead professionals as to what topics we need to address in the future.

Direct your questions, concerns, comments or ideas to Jay Wagar at:

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