

# Lead Abatement Trainer Newsletter

## Michigan Department of Community Health Healthy Homes Section

### Welcome to the Healthy Homes Section Lead Abatement Trainer Newsletter

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Volume 1, Issue 1

Hello Training Providers. This is issue number 1 of the Healthy Homes Section (HHS) Lead Abatement Trainer Newsletter. The intent of this newsletter is to answer questions you as trainers may have, that you are receiving from students in your classes, and address issues the Department is seeing among the lead professionals you have trained.

When certified lead professionals are cited as a result of improper lead abatement work practices, they often say the training providers never trained them properly or didn't cover all the required material in class. Overall we

know that is not the case and training providers in Michigan do a good job, but some issues seem to be perpetual problems. There are some topics that need more reinforcement or emphasis. Some of them will be addressed later in this newsletter.

The Lead Abatement Trainer Newsletter will be published at least twice a year. To help with future publications, your assistance is being requested. If you have any topics, questions, or

issues you would like discussed or answered, please send them to Jay Wagar at the Healthy Homes Section: [wagarj@mi.gov](mailto:wagarj@mi.gov).

We will also have a section for trainer tips. If you have a training tip or an idea that you would like to share with other trainers on techniques that work well for you, please forward them to Jay.



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### Initial Training Class Issues

There are two primary concerns in regard to initial training classes:

1. Overall time for initial training often comes up short. Time requirements for the disciplines are in the Lead Hazard Control Rules, Sections 325.99205 to 325.99211.

The rules require 400 minutes per day of training time. Breaks and lunch are not included in the 400

minutes. The EPA "training hour" is 50 minutes. The other 10 minutes per hour are for breaks and lunch. If a class is 8 a.m. to 4 p.m. (8 hrs or 480 minutes), 80 minutes can be used for breaks and lunch. If a 10 minute break becomes a 20 minute break you have lost 10 minutes from meeting the time requirement and that time must be made up. Citations may be issued for in-

sufficient time.

2. Hands-on time is the other most common issue. Hands-on time requirements can also be found in the sections of the rules stated above. The goal of hands-on activities are to give the students practical experience in the work practices they will need to do lead abatement activities correctly. The more real-life the activities are in training, the better they will perform on the job.

Exercise sheets involving work scenarios that allow students to think through how to choose appropriate abatement options, practice writing reports, or fill out paperwork correctly are also acceptable.

Be creative and try to make hands-on training interesting and practical. Contact Jay if you need suggestions or ideas.

# Guidelines for Work Practices

Since the HUD Guidelines have not been updated since 1997 and the industry has continued to adapt and change, the American Society for Testing and Materials (ASTM) Standards has become the accepted source for specific procedures and methods. We strongly suggest that you purchase the following ASTM Standards and incorporate them into your training programs:

E 1727-05 **Standard Practice for Field Collection of Soil Samples for Subsequent Lead Determination**

E 1728-10 **Standard Practice for**

**Collection of Settled Dust Samples Using Wipe Sampling Methods for Subsequent Lead Determination**

E 2255-04 **Standard Practice for Conducting Visual Assessments for Lead Hazards in Buildings**

E 2271-05a **Standard Practice for Clearance Examinations Following Lead Hazard Reduction Activities in Dwellings, and in Other Child-Occupied Facilities**

*Others standards to consider are:*

E 1729-05 - **Dealing with paint chip sampling.**

E 1796-03 - **Dealing with Encapsulant selection and application.**

E 1908-10 - **Dealing with Sample Selection of Waste from a Renovation or Lead Abatement Project for Toxicity Characteristic Leaching Procedure (TCLP) Testing for Leachable Lead (Pb)**



*Sealed HEPA vacuum*

F 1977-04 (2010) - **Standard Test Method for Determining Initial, Fractional, Filtration Efficiency of a Vacuum Cleaner System**

## Interior Clearances

From what the HHS enforcement staff have observed in the field, it is evident that more emphasis needs to be given in the training classes regarding the proper procedures for interior clearances. Those procedures are:

a) Check the scope of work or risk assessment report to determine if all the hazards have been addressed.

b) Do the visual clearance to determine if there is any visible dust or debris.

c) Take the appropriate number of dust wipes. This is also the order in which these things should be performed.

If the scope of work was not addressed completely and hazards remain, the job fails clearance. If dust or debris

**“Dust wipes should not be taken if the visual inspection fails.”**

is found during the visual inspection, then the job also fails clearance. Dust wipes should not be taken if the visual inspection fails.

If the visual inspection fails or the dust wipe samples fail, then all components represented by the failed sample, or rooms that were not sampled, must be re-cleaned. The visual inspection must be successfully repeated before dust wipes are taken again.

## Training Issues Regarding Dust Wipes

Issues have also been seen with dust wipe sampling. Give the inspector and risk assessor students more practice taking dust wipe samples. Too much variability is seen in sample taking. Some do not wipe the area well enough, while others vigorously scrub the area with the wipe media in a manner not in keeping with the S or Z motions described in the HUD Guidelines and the ASTM standard. Also, there have been cases where no accurate measurement or template was used



**Measure all dust wipes.**

and it isn't really important for a risk assessment.” Another said “I just call all my window sills 3” by 18” so I don't

when taking dust wipe samples. One risk assessor said, “I know what 12 inches looks like on a floor,

have to measure. That's close enough.” When we're talking of micrograms, close enough is not good enough.

Perhaps an exercise could be made using colored chalk line dust sprinkled lightly in the area where the dust wipe is to be taken. Have the students practice wiping the area so they can see what the goal should be for dust wiping, and if they are getting good coverage of the area. If a lot of visible chalk dust remains, then it wasn't done properly.

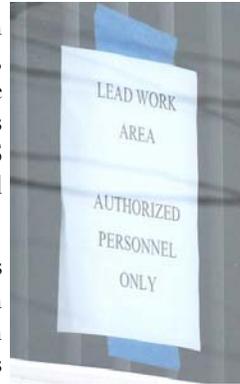
## Supervisor topics:

1. **Abatement set up:** The most common citations continue to be no or insufficient plastic, no signs, no or insufficient caution tape marking off the regulated work area, and not using a qualified HEPA vacuum. Please stress the need for these practices that show it is not just a normal construction site.

2. **Notifications:** Please make it very clear that the Healthy Homes Section wants the notifications at least 3 business days before the work is to start. If an abatement job is to start at 8:00 a.m. Monday morning, the notification needs to be received at our office by 8:00 a.m. the preceding Wednesday. For revisions, a 24 hour notice is re-

quired. If there is an emergency or, for example, the windows didn't arrive Monday morning as planned, calling the HHS is required with a faxed revision.

3. **Waste disposal:** As you know, most waste on an abatement worksite can be disposed of as "homeowner" waste, meaning it can be bagged and wrapped, and put in a dumpster. If the waste is not bagged or wrapped, it must be placed in a lined dumpster and a plastic runner must be



Remember proper signage

put down from the work area through the house and out to the lined dumpster.

4. **Occupant Protection Plan (OPP):** Please emphasize that the OPP must be completed by the supervisor prior to work beginning. The occupants must be made aware of the OPP and a copy must be on site. Though not legally required, it is recommended to have the occupants sign a copy of the OPP to acknowledge they are aware of

what work will be performed and what their responsibilities are while work is being done.

## Refresher Training

Undoubtedly students in your refresher courses question the value of attending the refresher classes, and some training providers have questioned the need for the refreshers to be 8 hours, however there are three things to consider:

1. The Lead Hazard Control Rules section R325.99212(3) clearly state refreshers must last 8 hours with the exception of Project Designer.
2. Evidence seen in the field supports

a conclusion that there are students that have forgotten much of their original training, or that they never learned some things to begin with, and therefore the refreshers are vital in getting our certified lead professionals performing at the highest level possible.

3. A good refresher should consist of at least four parts.

**"...refreshers must last  
8 hours ..."**

a) Review the information needed to pass the exam.

b) Review procedures critical to doing their work properly.

c) Explain changes to rules, laws, or work practices that have occurred over the last 3 years, or may occur soon.

d) Allow the students time to express their questions, concerns, and problems in the Lead Abatement industry.

## Exam issues

Often students arrive at the certification exam sites without having pre-registered with the Healthy Homes Section. This will not be allowed in the future. Students will need a confirmation letter from the Department, or the trainer or student needs a verbal ok to be scheduled for the state examination. Faxing applications or certificates alone is not sufficient to enroll students for an exam. For approval, information, or if you have questions regarding exam scheduling, call Sonya Adams at 517-

335-8385 or Jay Wagar 517-335-8466.

The most common complaint heard from students after exams is, "There was a lot on the State exam that we never learned in class." This usually isn't true. Explain to the students that the State exams and course exams have different purposes. In the initial training, they are taught new information (ie:  $\mu\text{g}/\text{M}^3$ ,  $\text{mg}/\text{cm}^2$ ,  $\mu\text{g}/\text{dL}$  of blood, etc.). When they take the State examination it is assumed that they learned the numbers, units, and definitions in

class, so there are fewer questions that deal with numbers and units. The State test has questions that ask things like, "When you reach the Permissible Exposure Limit of  $50 \mu\text{g}/\text{M}^3$ , what actions must be taken before work can continue on a lead abatement work project?" Explain to the students they do need to know the numbers, but more importantly they need to know how to use the information when they are performing work on lead-based paint abatement projects.



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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. We would like help from trainers and certified lead professionals as to what topics we need to address. Direct your questions, concerns, comments or ideas to Jay Wagar at:

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517-335-8466 or mail to

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## Inspector/Risk Assessor Report Writing

Inspection and Risk Assessment report writing is often viewed as a difficult challenge to the new lead inspector and risk assessor. The newly trained professionals state:

1. They were not provided a pattern or template of a what a good report should look like.
2. They were not taught how to download data from an XRF and how to sort the data.
3. They were not given enough training, or hands-on experience concerning what building components to test, and how components differ from testing combinations.

The main problems seen when reports are reviewed in the office are:

a) Reports aren't complete. In the Lead Hazard Control Rules 325.99404(10), it lists all the items that need to be included in a Risk Assessment Report. They are listed as "a - t". If any item is not included in the report, then the report is not fully compliant.



b) Many reports lack the required plain language summary. Reports must include a narrative about the lead hazards and how to correct them. The report needs to be more than XRF readings, dust wipe results, and charts in order for the homeowner to understand the report.

c) In the majority of reports there is no explanation on how to read the XRF table, such as what depth indicator or mg/cm<sup>2</sup> mean.

d) A prioritization and severity of hazards is frequently not provided.

Please work to emphasize these issues in your training classes and develop hands-on activities to reinforce these topics with the students.