




# Lead Paint

- Health Impacts of Lead
  - History of Lead Poisoning
  - HOP Requirements for Shelter & Emergency Apartments
  - Documentation & Recordkeeping
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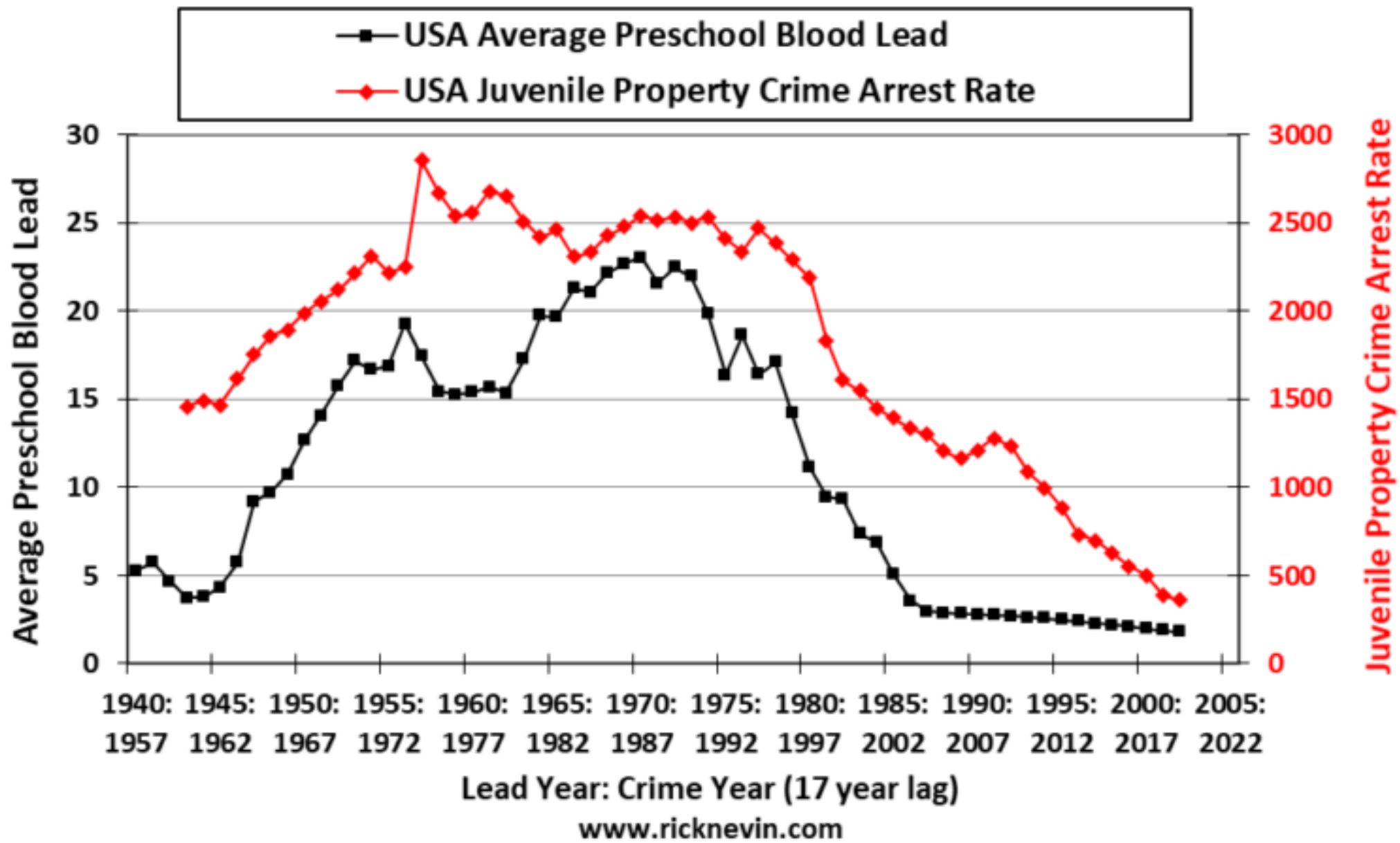
# Health Impacts of Lead

- For adults, lead exposure can cause **high blood pressure, and brain, kidney, and reproductive health issues.**
- It is particularly harmful to children **under 6** as it interferes with the development of the nervous system and internal organs.
- Lead can accumulate in the body over time and is stored in the teeth and bones.
- Lead in bone is released into blood during pregnancy and becomes a source of exposure to the developing fetus.
- There is **no level of exposure** to lead that is known to be safe for infants through 5-year-olds.
- Vermont has lowered its definition of elevated blood lead to **any reported level.**

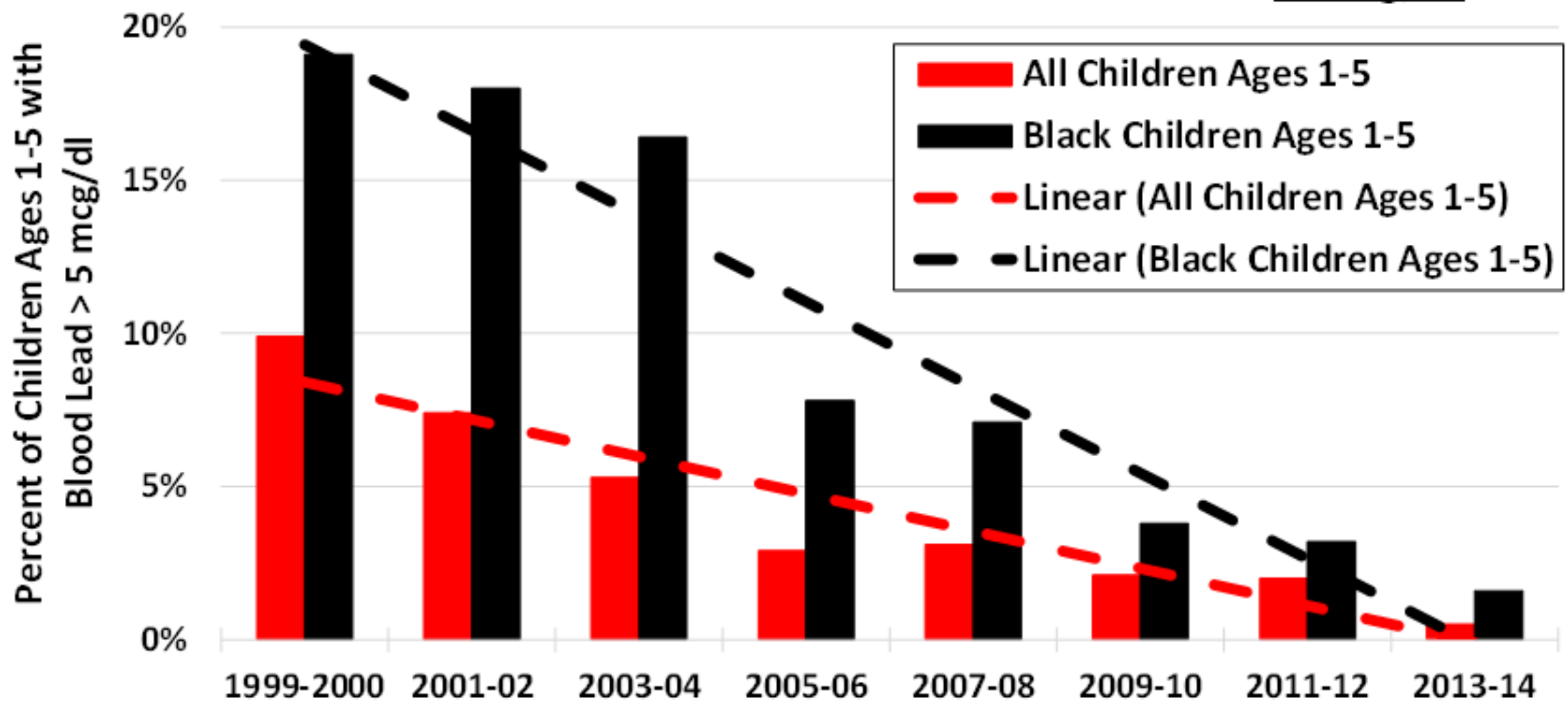
## Risk to Children

- Primarily from lead dust created by **friction surfaces** and deteriorated paint.
- Dust clings to hands, toys, clothing, curtains, and furniture.
- Also, from paint chips that can be ingested.





# 1999-2014 Prevalence of Preschool Blood Lead > 5 mcg/dl



# History – When did we first know?

- The earliest written accounts of lead toxicity have been found in Egyptian papyrus scrolls which describe lead's use for homicidal purposes.
- The 2<sup>nd</sup> century **BC** writings of Nicander contain the first clinical account of lead poisoning.
- A 1st century **AD** Greek physician wrote that lead makes the mind "give way".

In Rome, lead poisoning selectively affected the upper class who drank wine out of lead vessels, ate food cooked in lead pots, and drank water from lead pipes.

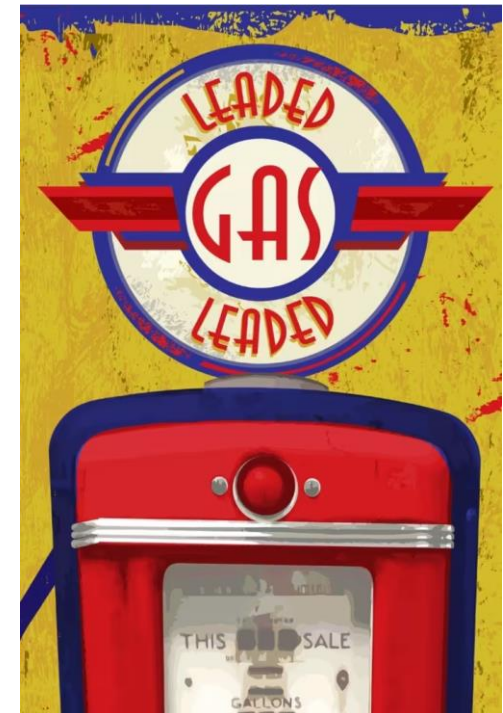


# If we knew about lead's hazards, why did we add it to stuff?



It made the paint more durable.

It made clunky engines run smoother.





# HOP/HUD Regulations

- HOP's Lead Paint Regulations trickle down from HUD **(24 CFR part 35, subparts A, B, H, J, K, M, and R)**.
- They apply to all shelters that were constructed **prior to 1978** that may house **children under 6** years of age.
- For **RRH** the standard is children under 6 or **pregnant women**.

- HUD's regulations require us to **presume** that interior and exterior paint, in buildings constructed prior to 1978, contains lead.
- HUD regulations target interior and exterior **deteriorated** paint in buildings constructed prior to **1978**.
- **Deteriorated paint must be stabilized.**
- HUD and **VT's Renovation, Repair, Painting, & Maintenance (RRPM)** regulations tell us how the work must be done (unless de minimus).

HOP's regulations **do not** require you to:

- Test the paint for lead.
- Abate lead paint.

HOP's regulations **do** require you to:

- Perform an annual visual assessment by a HUD certified assessor.
- Stabilize deteriorated paint.
- Have the work done by a RRPM Licensed worker (unless area is de minimus)

<b>Work Practice</b>	<b>Vermont RRPM Regulations</b>
Open flame burning or torching	Not allowed
Heat guns operated at or above 1100 °F	Not allowed
Dry scraping or sanding	Not allowed
Power sanders or similar mechanical tools	Need permission from the Department of Health and the equipment must be equipped with proper filtration
Hydro-blasting or high-pressure washing	Not allowed
Abrasive blasting or sandblasting	Not allowed
Chemical stripping	Not allowed

Deteriorated paint is defined as any **interior or exterior** paint that is:

- **Peeling,**
- **Chipping,**
- **Chalking, or**
- **Cracking,** or otherwise damaged or separated from the substrate."











## From HUD Visual Assessment Training:

*“When performing a visual assessment, if the size is larger than a nail hole or hairline crack, you should consider the paint to be deteriorated.”*

# Documentation

**HOP's shelter providers must document that they have done these 3 things.**

1. Provided household with a copy of an EPA lead paint information brochure;
2. Disclosed to guests known lead hazards (disclosure statement);
3. Conducted an annual Visual Assessment for deteriorated paint.  
(must be done by a HUD certified Visual Assessor);



# Protect Your Family From Lead in Your Home



 **EPA** United States  
Environmental  
Protection Agency

 **United States  
Consumer Product  
Safety Commission**

 **United States  
Department of Housing  
and Urban Development**

March 2021

Disclosure of Information on Lead-Based Paint and/or Lead-Based Paint Hazards

Lead Warning Statement

*Housing built before 1978 may contain lead-based paint. Lead from paint, paint chips, and dust can pose health hazards if not managed properly. Lead exposure is especially harmful to young children and pregnant women. Our shelter building was constructed prior to 1978 and we are required to disclose the presence of known lead-based paint and/or lead-based paint hazards in the shelter. Shelter guests must also receive a federally approved pamphlet on lead poisoning prevention.*

Shelter Provider's Disclosure

(a) Presence of lead-based paint and/or lead-based paint hazards (check (i) or (ii) below):

(i) \_\_\_\_\_ Known lead-based paint and/or lead-based paint hazards are present in the housing (explain).

\_\_\_\_\_

(ii) \_\_\_\_\_ The Shelter Provider has no knowledge of lead-based paint and/or lead-based paint hazards in the shelter.

(b) Records and reports available to the shelter guest (check (i) or (ii) below):

(i) \_\_\_\_\_ Shelter Provider has provided the shelter guest with all available records and reports pertaining to lead-based paint and/or lead-based paint hazards in the shelter (list documents below).

\_\_\_\_\_

(ii) \_\_\_\_\_ Shelter Provider has no reports or records pertaining to lead-based paint and/or lead-based paint hazards in the housing.

Shelter Guest's Acknowledgment (initial)

(c) \_\_\_\_\_ Shelter Guest has received copies of all information listed above.

(d) \_\_\_\_\_ Shelter Guests has received the pamphlet *Protect Your Family from Lead in Your Home*.

Certification of Accuracy

The following parties have reviewed the information above and certify, to the best of their knowledge, that the information they have provided is true and accurate.

Shelter Provider: \_\_\_\_\_ Date: \_\_\_\_\_

Shelter Guest: \_\_\_\_\_ Date: \_\_\_\_\_

# How to document?

Some options:

- A signed transmittal form where guests acknowledge receipt of documents.
- Have the guest initial the document and photocopy it for their file.
- Add check boxes onto an intake form that the applicant signs.

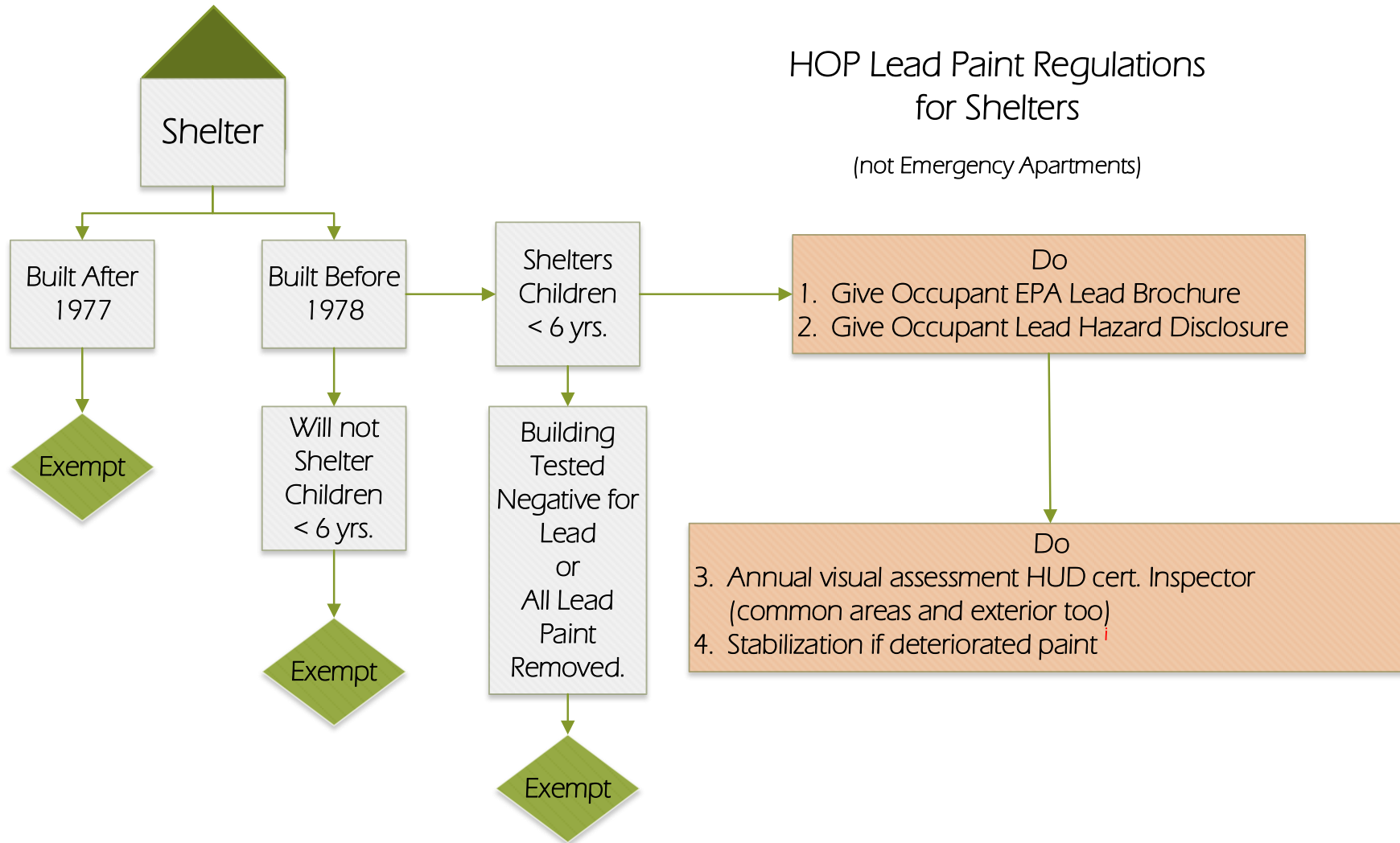
All stabilization of deteriorated paint work in pre-1978 buildings must be done in compliance with:

- **24 CFR 5.105**; and Vermont's **Renovation, Repair, Painting and Maintenance (RRPM) Regulations**.
- **RRPM** requires that workers be licensed or be supervised by someone who is RRPM licensed.
- VT's **RRPM** standards also apply to general renovations and repairs.

## Exemptions for Shelters?

A pre-1978 shelter can only be exempted from the regulations if:

- It has tested negative (interior and exterior) for lead by a HUD certified tester (X-Ray Fluorescence (XRF) lead-based paint analyzer); or
- The building has been substantially renovated such that there are no original painted surfaces; or
- The shelter will not house children under 6 years of age.

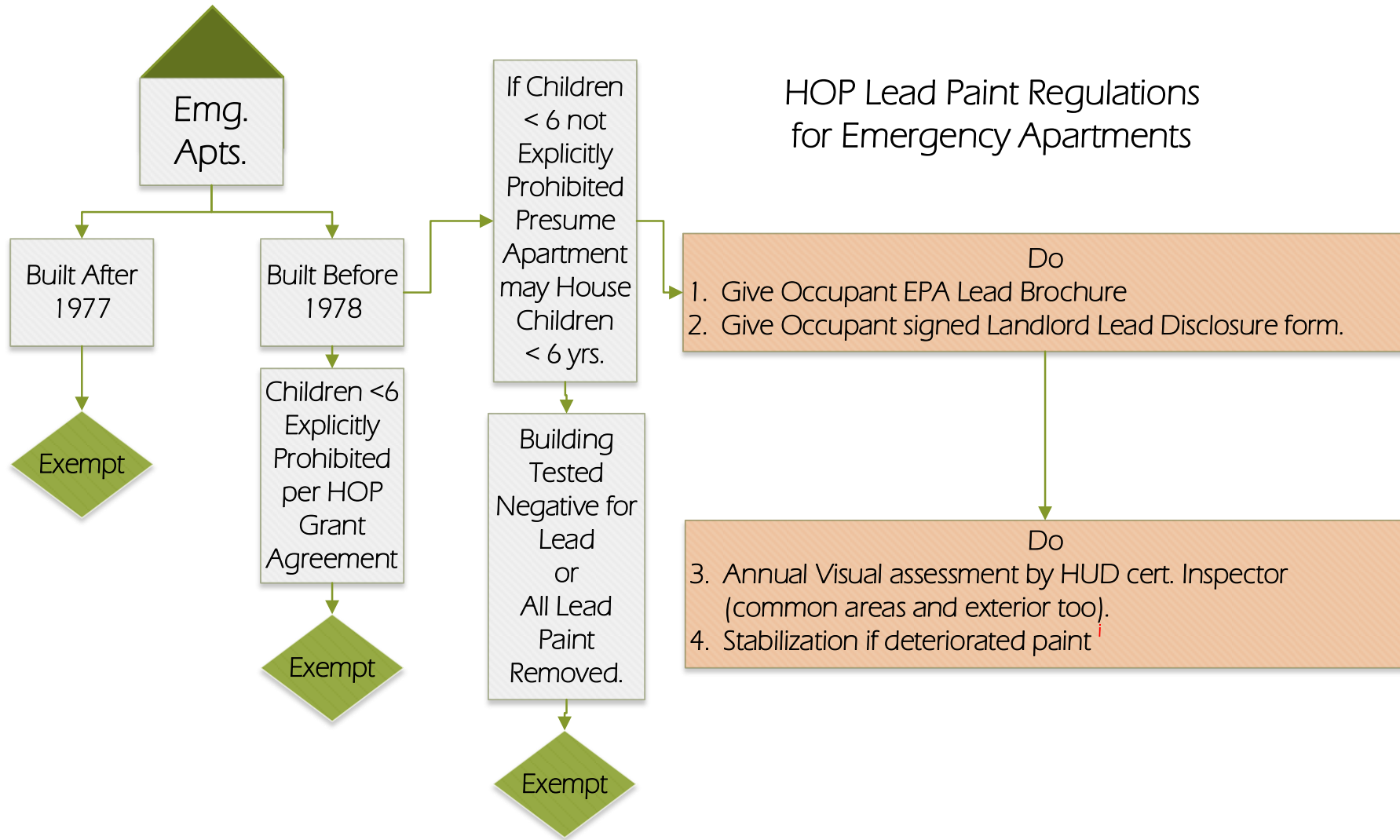


i. Stabilization work must be done in compliance with VT RRPM Regulations

**Brochure Link:** <https://www.epa.gov/lead/protect-your-family-lead-your-home-english>

**Disclosure Link:** <https://outside.vermont.gov/dept/DCF/Policies%20Procedures%20Guidance/OEO-HOP-Standards-Appendix-F.pdf>





i. Stabilization work must be done in compliance with VT RRPM Regulations

Brochure Link: <https://www.epa.gov/lead/protect-your-family-lead-your-home-english>

Landlord Disclosure Link: [https://www.epa.gov/sites/production/files/documents/lesr\\_eng.pdf](https://www.epa.gov/sites/production/files/documents/lesr_eng.pdf)

## Definition of **de minimis**.

- (1) 20 square feet or less on exterior surfaces,
- (2) 1 square foot or more in any room on the interior.