

VCDP SCATTERED SITE APPLICATION

Applicability of the EPA's Lead-Based Paint, Renovation, Repair, and Painting Program Rule

Lead based paint (LBP) may be present in buildings constructed prior to 1978. HUD's thresholds that determine if lead testing and abatement is required is dependent on dollar value of the project. The Subgrantee will adhere to the following Lead Safe Housing Rule (LSHR) thresholds:

- **De minimis** Threshold (as defined in 24 CFR §35.1350(d)): Work which disturbs less than 20 square feet on exterior surfaces; 2 square feet in any one interior room or space; 10 percent of total surface area of interior or exterior component type with a small area (sills, baseboards, etc.)
 - Work on surfaces where the amount of paint disturbed is below the **de minimis** threshold do not need to follow lead safe work practices, although HUD recommends that caution be used to minimize the dispersal of lead in dust, paint chips, or debris.
- Rehab Work Below \$5K per unit:
 - Only consider the surfaces that are being disturbed
 - Test for LBP OR
 - Assume surfaces contain LBP
 - Use Lead Safe Work Practices in accordance with 24 CFR §35.1350
 - Clearance of Worksite is performed at the end of the job to ensure that no lead dust hazards remain.
- Rehab Work \$5k to \$25k per unit:
 - Interim Controls
 - LBP Risk Assessment OR
 - Assume all potential lead hazards are present
 - Use Standard Treatments to address hazards
- Rehab Work Above \$25K per unit
 - Perform LBP Risk Assessment
 - Abate all identified Hazards

For housing units occupied by environmental intervention blood lead level (lead poisoned) children under six years of age, a risk assessment must be conducted (paid for by the PHA). If lead hazards are identified during the risk assessment, the owner must complete hazard reduction activities.

(For additional information on lead-based paint requirements, see 24 CFR 35, subparts A, B, M and R)

In accordance with EPA regulations, "Lead-based Paint Poisoning Prevention in Certain Residential Structures" (40 CFR 745), as well as "Accreditation of Training Program: Target Housing and Child-Occupied Facilities" (40 CFR 745.225), all contractors must employ lead-safe work practices while completing residential property renovations.