



MMHA

TO: All Section 8 Landlords

FROM: Kelly Parker, Program Manager

SUBJECT: Lead Paint Regulations

As you may be aware, there have been changes to the federal regulations governing the Section 8 Program related to lead paint. We have provided periodic reminders for Section 8 landlords to check their units and resolve any defective paint issues before the Medina Metropolitan Housing Authority (MMHA) conducts an inspection. Any paint separating from the interior or exterior surface must be removed and recovered, using safe work practices.

Included with this memo is information regarding lead paint requirements. In the event an MMHA inspection identifies any areas of defective paint, the landlord will be required to safely treat the defective area(s) and arrange for a clearance test. Costs related to removal/recovering of defective areas and any testing will be responsibility of the landlord. The clearance test will verify whether or not the unit falls within safe lead levels. A copy of the passed clearance test results is to be provided to the MMHA, along with certification from the landlord that safe work practices were used in the treatment of the defective paint. In the event the property has already been tested and the property was found to be within safe lead levels, a copy of the certification is to be submitted to our office.

Please check your property to ensure that any paint issues are resolved **before** an MMHA inspection. In the long run, we can all save time and money, while providing safe, affordable housing to the residents of Medina County.

As always, your participation in the Housing Assistance Payments (HAP) program is greatly appreciated. Please feel free to contact me if you have any questions.





MMHA

LEAD PAINT HAZARD CONTROL REQUIREMENTS

Lead paint requirements apply to all Section 8 assisted units built before 1978 that **may** be occupied by families with children under age six. If a unit **may** be occupied by a child under age six, and has defective paint on interior painted surfaces, entrance or common halls, or exterior surfaces, such surfaces must be treated using safe work practices, unless the surface has been previously tested and found to be lead-free.

If any unit may be occupied by or is intended to be occupied by a child under age six **with** an elevated lead content in their blood (confirmed concentration of lead in whole blood of 20 ug/d), testing for lead paint on chewable surfaces **MUST** be done by a certified risk assessor. Automatic treatment of chewable surfaces can be done in lieu of testing.

Acceptable methods of treatment are: removal by wet scraping, wet sanding, chemical stripping on or off site, replacing painted components, scraping with infra-red or coil type heat gun with temperatures below 1100 degrees, HEPA Vacuum sanding, HEPA vacuum needle gun, contained by hydroblasting or high pressure wash with HEPA vacuum. Surfaces may be covered with durable materials with joints and edges sealed and caulked to prevent the escape of lead contaminated dust.

Prohibited methods of removal are: open flame burning or torching; machine sanding or grinding without a HEPA exhaust; uncontained hydroblasting or high pressure wash; and dry scraping except around electrical outlets or except when treating defective paint spots no more than two square feet in any one interior room or space (hallway pantry, etc) or totaling no more than 20 square feet on exterior surfaces.

Clean up: All treatment procedures must be concluded with a thorough cleaning of all surfaces in the room or area of treatment to remove fine dust particles containing lead. Cleanup may be accomplished by wet washing surfaces with a lead solubilizing detergent such as trisodium phosphate or other all-purpose cleaners.

Waste and debris must be disposed of in accordance with all applicable Federal, state and local laws.

Clearance testing: After treatment of defective paint and clean-up has been accomplished, clearance testing must be performed by a qualified clearance tester. Dust samples will be collected and sent to a lab and tested for lead content. If lead content is within safe levels, no further action is required. If levels are higher than the safety level, further cleaning will need to be done and the unit retested.

Tenant protection: The owner must take appropriate action to protect residents and their belongings from hazards associated with treatment procedures. Residents must not enter spaces undergoing treatment until cleanup is completed. Personal belongings that are in work areas must be relocated or otherwise protected from contamination. During exterior treatment, soil and playground equipment must be protected from contamination by lead dust.



MMHA

IMPORTANT NOTICE!

NEW LEAD PAINT REGULATION

The new lead paint regulation was effective on September 15, 2000

The new regulation applies to all residential structures built before 1978 that are presently occupied by or may be occupied by children under six years old.

Units NOT included in this regulation are:

1. O-Bedroom units
2. Properties that have already been tested and are found not to have lead-based paint and properties that have had previous lead pain abatement.

If peeling paint is found in your unit during inspection, you will be required to treat the defective paint surfaces using the new HUD treatment and clearance requirements. MMHA urges you to inspect your unit and correct any deteriorated paint PRIOR to the MMHA inspection.

Attached is an overview of the new requirements. More extensive information on the new regulation is available upon request.