

RIDOH LHR STANDARD

Lead Hazard Reduction (LHR) Summary

Applicability

Property owner is in receipt of a notice or order from RIDOH requiring LHR (e.g. Notice of Violation).

Funding agency requires LHR (e.g. HUD-grantee).

Owner requests LHR.

Scope

Paint, water, dust, and soil for the entire dwelling unit and common areas must meet the RIDOH lead-free or lead-safe standards.

LHR Licenses

Owner/principal or employee of the Lead Contractor must complete the Lead Supervisor training and pass the state written exam.

Licensed Lead Supervisor must be on site during all LHR activities.

Pre-Renovation Education (PRE)

Protect Your Family from Lead in Your Home with *What You Should Know About the Rhode Island Lead Law* must be distributed to owner and occupants at least 7 days but no more than 60 days in advance of beginning the work.

Written proof must be kept for at least 3 years after the work is completed.

Start Work Notification (SWN)

Required for all interior and exterior work.

Must be received by RIDOH at least 7 days in advance of beginning the work.

Supervisor must call RIDOH at 401-222-7796 when the containment set up begins.

If project does not begin or end within 7 days of the start or end dates on the SWN, a revised or canceled SWN is required.

If project is done in phases, a new SWN must be submitted for each phase.

Occupant Protection

Occupants must vacate the dwelling unit until dust wipe clearance is achieved.

Warning Signs

Must contain at least the text required by 29 CFR 1926.62(m):

Warning:

Lead Work Area

May Damage Fertility or the Unborn Child

Causes Damage to the Central Nervous System

Do Not Eat, Drink, or Smoke in this Area

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Sign Must Contain a 24-hour emergency number (not 911).

To the extent practicable, sign must be in the primary language of the occupants.

Sign must be readily visible and securely affixed in such a way that prevents their loss or unintentional removal.

Sign must remain in place and readable until clearance is achieved.

Environmental Lead Standards

Media	Lead Free	Lead Safe	Conditionally Lead Safe	Lead Hazard
Paint	< 90 ppm	90 to < 5,000 ppm or < 1.0 mg/cm ²	Intact Paint ≥ 5,000 ppm or ≥ 1.0 mg/cm ²	Damaged Paint ≥ 5,000 ppm or ≥ 1.0 mg/cm ²
Dust	< 10 µg/ft ²	Floors: 10 to < 40 µg/ft ² Window Sills: 10 to < 250 µg/ft ² Window Wells: 10 to < 400 µg/ft ² Any Other Surfaces: 10 to < 40 µg/ft ²		Floors: ≥ 40 µg/ft ² Window Sills: ≥ 250 µg/ft ² Window Wells: ≥ 400 µg/ft ² Any Other Surfaces: ≥ 40 µg/ft ²
Soil	< 150 ppm	< 400 ppm	Covered Soil ≥ 400 ppm	Bare Soil ≥ 400 ppm
First Draw Water	< 5 ppb	5 ppb to < 15 ppb		≥ 15 ppb
Flushed Water	Not Applicable	< 15 ppb		

Interim Controls

Paint stabilization.

Non-permanent enclosure or encapsulation.

Modification of double-hung windows by stripping sashes, installing track liners, and covering wells.

Covering soil with grass, gravel, or mulch, with or without landscape fabric.

Abatement Methods

Window replacement.

Paint removal using approved methods.

Mechanically fastened permanent enclosure with all edges and seams sealed.

Liquid encapsulation products may be considered a form of abatement when approved in advance by RIDOH. The encapsulation process must meet all requirements of the manufacturer's 20-year warranty, including but not limited to, surface assessment testing, proper preparation, approved primers, application methods, number and thickness of coats, periodic monitoring and touch up as necessary.

Component removal/replacement.

Covering soil with pavement.

Excavating lead-contaminated soil.

Replacing all leaded pipes, soldered joints, couplings, and fixtures with lead-free materials.

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Prohibited Work Practices

Dry hand scraping, except for within one foot of electrical outlets;
Dry hand sanding, except for “feathering” of previously treated interior painted surfaces;
Using a heat gun or other heated device, which chars paint, or at surface temperatures at or above 1100° F;
Open flame burning or torching;
Using paint strippers which are flammable or contain methylene chloride;
Using mechanical paint removal equipment not controlled by a HEPA vacuum system, and/or with a sanding or scraping disk wider than the direct surface upon which it is being used;
Using dry abrasive blasting equipment not controlled by a HEPA vacuum system;
Hydro blasting, including but not limited to, using wet abrasive blasting equipment, and pressure or power washing;
Any other interior methods not approved by RIDOH;
Any other exterior methods not approved by DEM Office of Air Resources; and/or
Any treatment in violation of local municipal building codes.

Approved Work Practices

Wet hand scraping or sanding;
“Feathering” of previously treated interior painted surfaces;
Using heat guns that do not char paint or exceed 1100° F;
Paint stripping in adequately ventilated areas using non-flammable chemical strippers that do not contain methylene chloride;
Using shrouded mechanical paint removal equipment controlled by a HEPA vacuum system, provided that any and all spent abrasive, paint, particulate, dust, and/or other debris generated by the operations is immediately collected by the system, and provided that no sanding or scraping disk is wider than the direct surface upon which it is being used;
Using dry abrasive blasting equipment controlled by a HEPA vacuum system, provided that any and all spent abrasive, paint, particulate, dust, and/or other debris generated by the operations is immediately collected by the system, or a vacuum blast system used in accordance with the manufacturer’s guidelines (variance required for interior blasting);
Any other interior methods approved in writing by RIDOH; or
Any other exterior methods approved in writing by DEM Office of Air Resources.

Cleaning

Cleaning must include the entire dwelling unit and/or common area, as applicable.
Final cleaning must begin no sooner than 1 hour after preliminary cleaning was completed.
For mechanical paint removal, final cleaning must begin no sooner than 24 hours after preliminary cleaning was completed.

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Clearance Inspection

Clearance area must be “whole unit”.

Dust wipe sampling must begin no sooner than 1 hour after final cleaning was completed.

Lead Safe Certificates

Form	Certificate	Expiration
*PBLC-15	Conditional Lead Safe Certificate	2 years from passing interior dust wipes
*PBLC-15I	Interior Conditional Lead Safe Certificate (11/1-3/31)	The following 6/30; exterior reinspection required
PBLC-15E	Certification of Lead-Safe Status with Annual Reinspection Exemption	No longer issued; deregulated upon property transfer, cannot be renewed
*PBLC-21	Full Lead Safe Certificate or Certification of Lead-Free Status	No expiration
PBLC-27	Partial Lead Safe Certificate	Not applicable; temporary certificate
*Comprehensive Environmental Lead Inspection required		

If the project is done in phases, Partial Lead Safe Certificates (PBLC-27) may be obtained to document those areas/media are safe for re-occupancy. An Interior Conditional Lead Safe Certificate (PBLC-15I) may be issued between November 1st and March 31st, when the weather prevents addressing exterior paint and/or soil hazards. An “Interior” certificate will expire on the following June 30th. An exterior reinspection is required on or before June 30th to obtain a Conditional Lead Safe Certificate (Form PBLC-15) which will expire 2 years after passing interior dust wipe clearance. After June 30th, a whole unit (interior and exterior) inspection, including dust wipe sampling, is required. A final Conditional Lead Safe Certificate (PBLC-15) or Full Lead Safe Certificate (PBLC-21) is required and can only be obtained when all hazards are corrected, and the paint, water, dust, and soil meet the RIDOH lead-free or lead-safe standards as determined by a Comprehensive Environmental Lead Inspection (CELI).

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Definitions

“Interim Controls” means a set of temporary measures designed to control exposure to environmental lead hazards, including, but not limited to, specialized cleaning, repairs, maintenance, painting, non-permanent encapsulation or enclosure, and ongoing monitoring of lead-based paint and soil for potential lead hazards. Interim controls include all preparation, cleanup, disposal, and cleaning verification or clearance inspection testing activities, as applicable, associated with such measures.

“Lead Abatement” means a measure or set of measures designed to permanently eliminate lead-based paint and/or lead hazards, including all preparation, cleanup, disposal, and post abatement clearance inspection testing activities associated with such measures. Abatement strategies include the removal of lead-based paint, permanent encapsulation or enclosure of lead-based paint, replacement of building components; replacement of plumbing components; removal of lead-contaminated dust; and removal or permanent covering of lead-contaminated soil.

“Lead Hazard Reduction” means lead abatement, interim controls, or a combination of the two intended to correct lead hazards identified in a lead inspection report or standard treatments to remove lead-based paint and/or minimize lead exposure, which may include measures to reduce the concentration of lead in paint, dust, soil, or drinking water, using approved treatments and work methods specified in 216-RICR-50-15-3.