ODH Lead Training Update

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Testing Combinations

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A common problem ODH has noted while reviewing the quality of risk assessment and inspection reports is the failure to include all surfaces in the hazard reduction plan. Within each room equivalent, surfaces can be grouped into testing combinations.

HUD defines a **room equivalent** as an identifiable part of a residence such as a room, house exterior, foyer, etc. Closets or other similar areas adjoining rooms should not be considered as separate room equivalents unless they are obviously dissimilar from the adjoining room equivalent.

HUD also defines a **testing combination** as a unique combination of room equivalent, building component type and substrate, such as cabinets, baseboards, doors and trims, shelves, etc. Certain building components that are adjacent to each other and have similar painting histories can be grouped together into a single testing combination, for example:

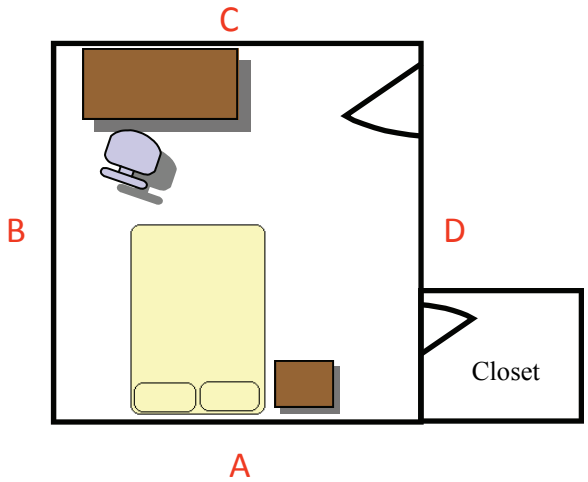
- Window casings, stops, jambs and aprons
- Interior window mullions and window sashes (but don't group interior with exterior)
- Exterior window mullions and window sashes
- Door jambs, stops transoms, casings and other door frame parts
- Baseboards and associated trim, such as quarter-round or other caps

By making assumptions about the paint histories of similar component types and grouping component types into testing combinations the number of components tested can be reduced. Grouping items into testing combinations also simplifies the recommendation of corrective actions. Instead of sampling and making recommendations for each sill, casing, jamb, apron, parting bead and well for each window in a room, the windows are grouped into a testing combination. The sampling and the recommendation to control the hazard applies to all the windows in the room because they have been grouped into a testing combination. Care must be taken to ensure the component types with the same or similar construction and paint history are addressed adequately. If surfaces are not included in a testing combination, they must be tested separately.

Chapter 7 of the HUD Guidelines provides guidelines for paint inspection procedures. If paint testing of the component (XRF or paint chip analysis) indicates the sample is below 1.0 mg/cm^2 then the component is lead-based paint free. An untested component cannot be considered lead-based paint free unless it is part of a testing combination in a room equivalent that has the same or similar construction and paint history that tested negative.

Incomplete descriptions of testing combinations make it difficult to write a comprehensive hazard reduction plan. Hazard reduction plans should not require someone to make assumptions of which components are grouped and which are not. It must be reflected in the report that the component has the same paint and construction history as the tested component.

Let's look at some examples.



Bedroom No. 1

Example #1:
XRF testing as part of a risk assessment indicates the baseboard on wall C of bedroom No. 1 tested positive for lead. The other baseboards in the room were not tested. The risk assessment recommendation was that the baseboard on wall C of bedroom No. 1 should be replaced.

The recommendation for controlling the lead hazards should include treatment of all baseboards in that room equivalent, because they are of the same testing combination. If they are

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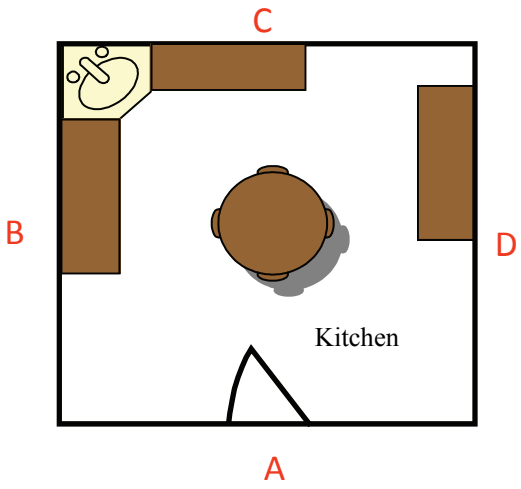
of a different testing combination, then the other baseboards should have been tested separately. Keep in mind that this room equivalent might also include the adjoining closet. This recommendation might also include other associated trim such as the adjacent quarter round.



Example #2:
A small kitchen has cabinets on walls B, C and D. The cabinet on wall C was negative and on wall D was positive for lead-based paint. The risk assessment indicated the cabinet on wall D has lead-based paint and recommends the door edges be planed to eliminate the friction surface with lead-based paint. No recommendations were given for the cabinets on walls B and C.

The risk assessment should clearly indicate with which testing combination the untested cabinet is associated. If it is unknown, the cabinet should be tested separately or presumed to be positive for lead-based paint. Recommendations should include treatment of cabinet B as positive, because it was not indicated to be part of the same testing combination as the cabinet on wall C.

Example #3:
A homeowner has asked that lead-based painted components be replaced in her home during a kitchen renovation. The lead contractor has been provided only the XRF results for the home, not a full inspection report. The XRF results indicate lead based paint was only found on the back door, window casings and window sills.

This situation presents a dilemma for the contractor. If he writes the specs to replace only the components identified as having lead-based paint, it is possible he would miss other components that should have been included in the treatment. In this situation, it would be prudent to contact the person who conducted the sampling to obtain their testing combinations. If window aprons or other window components were considered part of the testing combination, they should also be included in the treatment. If clarification of testing combinations is not available, the specifications should also include replacement of the similar, untested components located in the same room, such as the other windows and associated window components in the room.

While these basic principals are taught in initial classes, they need to be reiterated in refresher classes, because the risk assessment reports do not always clearly identify exactly which surfaces are to be included in lead hazard control treatments.

Training Prior Notifications

In June, the Ohio Department of Health presented its Training Course Prior Notification form. We want to thank all of the training providers for using the new form. With that in mind, we would like to clarify a few details.

- Be sure to indicate which course is being offered by checking the appropriate box.
- Each course is to be notified on a separate notification.
- Use training course approval number (TL###) not your training provider number. ***(See page 4 for a chart with all course approval numbers and the respective expiration dates.)***
- Be sure to complete the dates and times the course is to be held.
- Incomplete notifications will not be accepted. In the past, we have accepted notification with the location left "TBD" or "TBA." But in many instances the training location is never updated. Any notifications that do not have a training location will be considered incomplete.
- Also, cancellations must be received at least one business date before the class is to begin. It is becoming far too common that classes are not cancelled in a timely manner.

A further clarification — there is no worker/supervisor or worker/contractor refresher. The terminology "supervisor" is obsolete. Workers may complete an eight - hour contractor refresher course to satisfy their renewal requirements. The course is a contractor course. The student is to take the contractor exam and if that student passes, the student is issued a contractor refresher certificate. The same holds true for inspectors taking risk assessors refreshers.

The elusive *THEY...*

While conducting course audits and project inspections ODH staff often hears "That's what *THEY* told me to do." *THEY* being the particular rehab program employing the contractor, a local municipality, the contractor paying for the clearance, etc. It needs to be stressed to students/ licensees that there is a hierarchy to the rules and regulations for lead work in Ohio. For all licensed lead professionals, the Ohio Administrative Code is always the top of the food chain. ODH rules are followed first, without exception. While there may be other agencies that have more stringent standards, ODH rules are never made less stringent.

LSR/EMP Hands-on requirements ...

Ohio Administrative Code (OAC) section 3701-32-16.3 defines the content requirements for both lead safe renovation (LSR) and essential maintenance practices (EMP) courses. Both courses require 1.5 hours of the course be designated as hands-on training or demonstration. The OAC goes further to define that the hands-on training shall provide hands-on experience on the following: site preparation, lead safe work practices and cleanup and decontamination. In an attempt to clarify what is expected in satisfying the hands-on/demonstration requirements of the above mentioned courses, the Lead Poisoning Prevention Program (LPPP) has prepared the following guidance. The LPPP has determined that the following methods will satisfy hands-on training/ demonstration requirements.

All students using or participating is an activity that uses the skill being taught is acceptable. The work practices and procedures in LSR/EMP courses are not difficult or cumbersome, but in many instances they are new to the students. We are asking the student to change from throwing down an old drop cloth, to taping two layers of 6 mil. polyethylene sheeting on the floor. Building containments, such as polying floors and creating airlocks for rooms, is foreign to many students. We are asking them to use a pry bar, utility knife and a spray bottle in place of a reciprocating saw. Correctly polying a work area, building an airlock, misting and scoring paint, gently removing window trim or using the HEPA vacuum to clean the window cavity are excellent hands-on opportunities. Using the skills firsthand only reinforces how simple what they are doing really is. In addition, a second hands-on opportunity is created by disassembling the containment and the cleanup of the work/work area.

An instructor demonstrating a particular skill or activity is acceptable. In some instances it is not feasible for all of the students to participate in a task due to space, time or safety considerations. In this case it is reasonable to allow the instructor to demonstrate the skill being taught. For example, there is little value to 15 students taking turns running a HEPA vacuum. On the other hand, the instructor demonstrating the procedure for use of the tool is of value. It is also of value for the instructor to demonstrate the decontamination of the tool or the changing of the bag (to not create a hazard).

Written exercises that require the students to actively use the skills being taught are acceptable. In many instances it is entirely appropriate that students participate in written exercises such as preparing a written plan for conducting a Lead-safe renovation – what tools are needed, what notifications to the occupants are necessary, what work practices are going to be utilized and so forth. Conversely, conducting this exercise as a group discussion does not satisfy the hands-on requirements. In this instance, there are too many occasions where one or two students will answer while the rest of the students are not engaged. Simply viewing a video that shows lead-safe work practices or a group discussion after watching the video also does not satisfy the hands-on requirements. Viewing the same video to provide the scenario for a written exercise does satisfy the hands-on requirements.

Ideally, all students will actively participate in tasks and exercises that require them to use the skills that are being taught. The goal of the hands-on training requirements is to engage all of the students and provoke thought and interaction about the skills they are being taught. The program believes using any combination of the previously defined methods will satisfactorily achieve this goal.

An invitation to trainers...

It's been many years since we've all gotten together. The Ohio Department of Health is planning a Training Summit. We would like to get all the Ohio-approved training providers together for a meeting of the minds. We would like to take the time to discuss updates, changes in training and identify ways to improve what we are doing. We are tentatively planning for a meeting in early 2008 in Columbus. We would like your input with regard to topics and times. Any ideas should be forwarded to Matt Young at matt.young@odh.ohio.gov or (614) 728-6714.

Training Course Approval Numbers and Expiration Dates

Asbestos Workers Regional Local 207		
Lead Core Course	TL56	1/4/2008
Worker - Initial	TL57	1/4/2008
Worker - Refresher	TL58	1/4/2008
Contractor - Initial	TL59	1/4/2008
Contractor - Refresher	TL60	1/4/2008
Corporation for Ohio Appalachian Development		
Lead Core Course	TL24	6/6/2010
Worker - Initial	TL19	6/6/2010
Worker - Refresher	TL20	6/6/2010
Contractor - Initial	TL23	2/6/2008
Contractor - Refresher	TL18	2/6/2008
Inspector - Initial	TL16	2/6/2008
Inspector - Refresher	TL17	2/6/2008
Risk Assessor - Initial	TL21	6/12/2008
Risk Assessor - Refresher	TL22	6/12/2008
Lead-safe Renovator	TL12	5/17/2010
Clearance Technician - Initial	TL13	5/17/2007
Clearance Technician - Refresher	TL14	5/17/2007
Essential Maintenance Practices	TL15	5/17/2007
International Union of Painters and Allied Trades		
Lead Core Course	TL52	3/12/2006
Worker - Initial	TL53	3/12/2006
Worker - Refresher	TL54	3/12/2006
Contractor - Initial	TL51	6/20/2006
Contractor - Refresher	TL55	9/26/2006
Lead Consortium		
Lead Core Course	TL45	11/26/2008
Worker - Initial	TL42	11/26/2008
Worker - Refresher	TL43	11/26/2008
Contractor - Initial	TL50	11/26/2008
Contractor - Refresher	TL46	11/26/2008
Inspector - Initial	TL49	11/26/2008
Inspector - Refresher	TL44	11/26/2008
Risk Assessor - Initial	TL47	11/26/2008
Risk Assessor - Refresher	TL48	11/26/2008
Project Designer - Initial	TL36	10/24/2008
Project Designer - Refresher	TL37	10/24/2008
Lead-safe Renovator	TL38	7/23/2010
Clearance Technician - Initial	TL39	7/23/2010
Clearance Technician - Refresher	TL40	7/23/2010
Essential Maintenance Practices	TL41	7/23/2010
Lead Experts, Inc.		
Lead Core Course	TL63	1/24/2008
Worker - Initial	TL64	1/24/2008
Worker - Refresher	TL65	1/24/2008
Contractor - Initial	TL68	1/24/2008
Contractor - Refresher	TL66	1/24/2008
Inspector - Initial	TL69	10/25/2007
Inspector - Refresher	TL70	10/25/2007
Risk Assessor - Initial	TL62	10/25/2007
Risk Assessor - Refresher	TL67	10/25/2007
Lead-safe Renovator	TL71	8/5/2010
Essential Maintenance Practices	TL61	5/1/2009

Mahoning County Health Homes/ Lead Hazard Control Program		
Lead Core Course	TL100	9/10/2010
Worker - Initial	TL101	9/10/2010
Worker - Refresher	TL102	9/10/2010
Contractor - Initial	TL103	9/10/2010
Contractor - Refresher	TL104	9/10/2010
Inspector - Initial	TL105	9/10/2010
Inspector - Refresher	TL106	9/10/2010
Risk Assessor - Initial	TL107	9/10/2010
Risk Assessor - Refresher	TL108	9/10/2010
Lead-safe Renovator	TL109	9/10/2010
Essential Maintenance Practices	TL110	9/10/2010
Ohio Central School System		
Lead Core Course	TL88	6/22/2007
Worker - Initial	TL86	6/22/2007
Worker - Refresher	TL87	8/31/2002
Ohio Laborer's Training and Trust Fund		
Lead Core Course	TL84	6/26/2010
Worker - Initial	TL83	6/26/2010
Worker - Refresher	TL85	6/26/2010
The InService Training Network		
Lead Core Course	TL30	7/22/2008
Worker - Initial	TL25	10/22/2009
Worker - Refresher	TL32	10/22/2009
Contractor - Initial	TL27	10/21/2008
Contractor - Refresher	TL26	10/21/2008
Inspector - Initial	TL31	4/13/2010
Risk Assessor - Initial	TL28	5/24/2010
Risk Assessor - Refresher	TL29	5/24/2010
Lead-safe Renovator	TL34	5/4/2009
Clearance Technician - Initial	TL33	12/3/2007
Essential Maintenance Practices	TL35	10/10/2009
Training Services International, Inc.		
Lead-safe Renovator	TL111	5/3/2008
University of Cincinnati Continuing Education		
Lead Core Course	TL77	6/6/2010
Worker - Initial	TL76	8/19/2009
Contractor - Initial	TL78	6/6/2010
Contractor - Refresher	TL79	6/6/2010
Inspector - Initial	TL82	6/6/2010
Inspector - Refresher	TL75	6/6/2010
Risk Assessor - Initial	TL81	6/6/2010
Risk Assessor - Refresher	TL80	6/6/2010
Lead-safe Renovator	TL73	7/20/2010
Clearance Technician - Initial	TL72	1/7/2008
Essential Maintenance Practices	TL74	7/20/2010
William E. Fink & Associates, Inc		
Lead Core Course	TL113	6/30/2008
Worker - Initial	TL112	6/30/2008

Some courses may be in the midst of the renewal process. Expiration dates reflect those current at the time of publication.

U.S. and Chinese Product Safety Agencies Announce Agreement To Improve The Safety of Imported Toys and Other Consumer Products

WASHINGTON, D.C. - In a cooperative effort to ensure the safety of children's toys, the U.S. Consumer Product Safety Commission (CPSC) announced an agreement with its product safety counterparts in the Chinese government aimed at stopping the use of lead paint in the manufacture of toys and addressing other product safety issues. At a "Consumer Product Safety Summit" held today in Washington, D.C., CPSC made known that China's General Administration of Quality Supervision, Inspection and Quarantine (AQSIQ) has agreed to take immediate action to eliminate the use of lead paint on Chinese-manufactured toys exported to the United States. Lead paint on toys sold in the United States has been banned since 1978.

In addition to the lead paint agreement, the two agencies announced work plans for cooperation in four product categories: toys, fireworks, cigarette lighters, and electrical products. The work plans provide a roadmap for bilateral efforts to improve the safety of these products, which represent some of the most frequent hazards under CPSC's regulatory jurisdiction.

CPSC Acting Chairman Nancy Nord stated that the work plans show "significant forward progress" in the agency's efforts to bring Chinese-made consumer products into line with U.S. safety rules.

"This is an important signal from the Chinese government that it is serious about working with CPSC to keep dangerous products out of American homes," said Acting Chairman Nord. "We will be looking for meaningful cooperation on the ground - that means not just with the Chinese government, but also with industry at both ends of the supply chain."

The summit also resulted in an agreement (pdf) by AQSIQ to increase its inspections of consumer products destined for the United States and to assist CPSC in tracing hazardous products to the manufacturer, distributor and exporter in China. The two agencies will review the plans' effectiveness within one year to identify possible areas for improvement.

Training hours — are we spending enough time?

To paraphrase the Ohio Administrative Code (OAC) a "training hour" consists of at least 50 minutes of actual instruction. This definition allows 10 minutes every hour for deviation from the topic at hand. This definition does not allow for an eight-hour training day to be compressed into less than eight clock hours. What we expect is eight hours of training per day. This does not include lunch. Courses that begin at 8:30 a.m. should end no earlier than 5:30 p.m.. This takes in to account the standard one-hour lunch. Any breaks are considered accounted for by the 10-minute buffer built in to the training hour. While the Ohio Department of Health (ODH) does not want to dictate how courses are scheduled or the specific agenda, the OAC does require ODH to assure that a minimum amount of time is utilized for approved training courses.

Little Reminders for students…

All licensees shall notify the director of the Ohio Department of Health of any change of address, employer, etc. within two weeks of the change.

All ODH forms and links to EPA and HUD publications are available on our web page at www.odh.ohio.gov

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