

# ODH Lead Training Update

Volume 1, Issue 1

Ohio Department of Health

Spring 2007

## Clearance Examination Reports

By: Pam Blais, R.S.

The Ohio Department of Health (ODH) has experienced many issues with clearance examination reports written by licensed lead risk assessors and lead inspectors for properties where lead hazards control orders have been issued. In many cases, the reports are incomplete and do not provide sufficient information to lift the lead hazard control order. The quality of the reports received may also be indicative of compliance issues with the clearance examination.

In an effort to improve the quality of the clearance examination reports, ODH is requesting that training providers incorporate and emphasize the following points in the lead inspector and risk assessor training courses:

### Licensed Lead Risk Assessors and Lead Inspectors

When performing a clearance examination in a residential unit, child daycare facility or school where lead hazard control orders have been issued, a lead risk assessor or lead inspector must perform the examination. Clearance technicians are not permitted to perform a clearance examination on these properties.

### Purpose of the Clearance Examination

It is the responsibility of the clearance examiner to determine whether lead hazard control orders have been issued on the property requiring the clearance examination **prior** to conducting the examination.

### Verification that lead hazard control work was performed by a licensed lead abatement contractor

A memorandum was issued by ODH on January 12, 2005, to licensed lead inspectors and lead risk assessors regarding clearance examinations performed on properties where lead hazard control orders have been issued. The document clearly states it is the responsibility of the inspector or risk assessor to ensure lead hazard control work performed on the property was completed by a licensed lead abatement contractor. Failure to do so would subject the risk assessor or inspector to possible enforcement action.

### Lead Hazard Control Order

The lead risk assessor or lead inspector **must** obtain a copy of the lead hazard control order prior to conducting the clearance examination. In most cases, the property owner can provide a copy of the order. The order may also be obtained from the regulatory authority responsible for its issuance.

After obtaining a copy of the order, the lead inspector or lead risk assessor shall review the order to determine the clearance area. The clearance area is defined as those areas where lead hazards have been identified. The lead inspector or lead risk assessor shall also obtain a copy of the lead risk assessment to gain additional testing and sampling information.

### Visual Assessment

As part of the clearance examination, the licensee shall perform a visual assessment of each lead hazard identified in the order, recording the findings on the visual assessment form. The licensee shall record the hazard as listed on the order, the location of the hazard, the method of control and indicate whether paint chips or visible dust/debris was identified. This form is enclosed and can be found on ODH's Web site at the following link: <http://www.odh.ohio.gov/pdf/forms/hea7731.pdf>.

### Collection of Environmental Samples

After the area has passed the visual assessment, the licensee shall choose sample locations for the purposes of collecting environmental samples for analysis. The lead inspector or lead risk assessor shall consult Table 1.0 in Ohio Administrative Code section 3701-32-12 when determining sample locations.

*Continued on page 2*

## Program Contacts

Ohio Department of Health  
Lead Poisoning Prevention Program  
246 N. High St., 3<sup>rd</sup> Floor  
Columbus, OH 43215  
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[Lead@odh.ohio.gov](mailto:Lead@odh.ohio.gov)

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Sanitarian Program Specialist 2

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### Clearance Examination Report requirements

A clearance examination report shall be issued for each clearance examination and comply with the following:

- Shall include a completed Clearance Examination Report Form as prescribed by the director (HEA7730). A copy of this form is included with this document.
- Shall include a detailed written description of all lead abatement, interim controls, essential maintenance practices, paint stabilization, or lead-safe renovation work and the locations where the activity was performed.
- Shall include a suggested monitoring schedule of encapsulants, enclosures and non-abatement lead activity to maintain sufficient control of lead hazards.
- Shall include a copy of the visual assessment form(s) (HEA7731) completed as part of the visual assessment. A copy of this form is included with this document.
- Shall be issued to the owner or manager of the property and to the individual who requested the clearance examination.
- Shall maintain a copy of each report issued for a period of at least three years and make the report available to the director upon request.

### Lead Training Course Prior Notifications

Ohio Administrative Code requires training providers to notify the Ohio Department of Health (ODH) by the 10th day of the month prior to the month training will be conducted. If the training is unscheduled, the notification needs to be submitted one business day before the commencement of the training. In an effort to clarify the situation, the lead program is adopting the same notification guidelines many of you already observe with regard to notifying asbestos courses. Please notify ODH 10 days prior to a training course. Attached you will find a copy of the notification form the program developed that we would like you to use for submitting your notifications. You will notice that is very similar to the one you are currently using for asbestos courses.

### Little Reminders...

**Passing** clearance sample results must be obtained **before** homeowners are allowed to re-occupy the work area. Simply collecting the samples is not sufficient.

During abatement, the licensed lead abatement contractors must remove and replace windows. Unlicensed individuals can **not** install windows after the abatement contractor has removed them.

### Personal Exposure Monitoring for Lead:

During the course of many recent lead abatement inspections, the Ohio Department of Health (ODH) is discovering a recurrent lack of lead exposure air monitoring data.

When an ODH inspector arrives at an abatement project site, one of the documents that we will ask for will detail your recent (annual) air monitoring data. The lab report, as well as some documentation describing the work that each sample represents are required to satisfy Ohio Administrative Code section 3701-32-08 (I)(10). This rule states that all persons involved in a lead abatement project shall follow the worker protection standards pursuant to Code of Federal Regulations 29 CFR 1926.62.

Exposure monitoring should be conducted annually, for a variety of types of lead abatement work that are being done by you and your workers. The sampling pump and cassette should be worn by one individual for the entire process of the work task. Window removal and replacement and friction surface planning would be good examples of representative work exposure tasks.

To comply with rules regarding exposure monitoring, the contractor may conduct the sampling on his own, or have a laboratory or environmental consultant provide the sampling equipment and supplies for you. The sampling equipment must be worn by you or a worker to be in compliance.

ODH has a limited number of air sampling pumps available to be loaned out to licensed lead abatement contractors. If you are interested in borrowing sampling equipment from ODH to use to meet the air monitoring requirements, please call (877) NOT-LEAD to request the equipment.

### Monthly Summaries

In the past, lead inspectors and risk assessors have been required to submit monthly summaries only for months when there is a reportable lead activity. Unfortunately, we have discovered that an overwhelming number of individuals are not abiding by this policy regarding monthly summaries. Consequently, monthly summaries are now required for all months. If the inspector/risk assessor completed no activities during a month, they need to notify ODH of no activity. Any individuals missing monthly summaries at the time they renew their license will not be approved until their monthly summaries are brought up to date. Copies of the monthly summary report are available on the ODH Web page. Monthly summaries may be mailed, emailed or faxed to the Ohio Department of Health at the following:

Ohio Department of Health  
Lead Poisoning Prevention Program  
246 N. High St., 3<sup>rd</sup> Floor  
Columbus, OH 43215  
Fax: (614) 752-4157  
[Lead@odh.ohio.gov](mailto:Lead@odh.ohio.gov)

# OHIO DEPARTMENT OF HEALTH

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Columbus, Ohio 43216-0118

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www.odh.state.oh.us



BOB TAFT  
Governor

J. NICK BAIRD, M.D.  
Director of Health

To: All Lead Inspectors and Lead Risk Assessors

From: David E. Holston, Environmental Abatement Section Chief 

Subject: Clearance procedures for Lead Hazard Control Orders

Date: January 12, 2005

As you are all aware, amendments to the Ohio Department of Health "Lead Hazard Abatement Rules" chapter 3701-32 of the Ohio Administrative Code (OAC) became effective on April 1, 2004. These rules state requirements for conducting clearance examinations in a residential unit, child day-care facility or school where lead hazard control orders have been issued.

The following are the requirements in rule 3701-32-12 (H) of the OAC and program procedures that are to be followed in conducting clearance examinations on properties with Lead Hazard Control Orders.

1. Review the lead hazard control order and work specifications (e.g. contractor's work specifications or report) to determine the clearance area.
  - Was the work performed by a licensed lead contractor or project designer? If the work was not performed by a licensed lead contractor or project designer do not conduct the clearance examination and contact our program at 877-668-5323.
  - Ensure that all lead hazards identified in the order have been sufficiently eliminated or controlled. If the lead hazards have not been sufficiently eliminated or controlled do not proceed with the clearance examination and contact the licensed contractor or project designer to inform them of the deficiencies and for correction prior to conducting another clearance examination.
2. Perform a visual assessment in the clearance area to identify the following.
  - All remaining deteriorated paint, visible dust, paint chips, debris, residue
  - Any remaining lead hazards
3. The findings of the visual assessment shall be recorded on the attached Ohio Department of Health Lead Hazard Control Visual Clearance form (HEA7731 9/04) as prescribed by the director.

4. If deteriorated lead based painted surfaces, visible dust, paint chips, debris, residue or remaining lead hazards are identified during the visual assessment, these conditions shall be eliminated or controlled. The lead inspector or lead risk assessor shall not collect dust samples until the clearance area passes the visual assessment.
5. If the area passes the visual assessment the lead inspector or lead risk assessor shall collect environmental samples.
  - Use Table 1.0 of the rule for guidance in **residential units** (see attached).
  - Use Table 1.1 of this rule for guidance in **child day-care facilities or schools** (see attached).
  - In order to pass a clearance examination of a residential unit, child day-care facility or school, the results must indicate the lead loading of the dust samples are less than the levels of lead hazardous to human health and clearance examination levels as listed below and set forth in rule 3701-32-19 of the OAC .
    - For single-surface wipes, have a lead loading less than
      - a) **40** micrograms per square foot ( $\mu\text{g}/\text{ft}^2$ ) on interior floors, or exterior living area floors or other horizontal surfaces other than window sills or window troughs
      - b) **250**  $\mu\text{g}/\text{ft}^2$  on interior window sills, exterior living area window sills, or any other interior chewable surface
      - c) **400**  $\mu\text{g}/\text{ft}^2$  on window troughs
    - Soil – if sampling is determined necessary by the director of health or his designee, lead inspector or lead risk assessor, have a concentration less than:
      - a) Equal to or exceed **1,200**  $\mu\text{g}/\text{ft}^2$  in non-play areas
      - b) Equal to or exceed **400**  $\mu\text{g}/\text{ft}^2$  in play areas
    - Water - if sampling is determined necessary by the director of health or his designee, lead inspector or lead risk assessor, have a concentration less than:
      - a) Equal to or exceed **15**  $\mu\text{g}/\text{l}$
  - All horizontal surfaces in the exterior living area closest to the surface abated or receiving interim controls shall be found to be free of all visible dust and debris.
6. When clearance examination sample results indicate the lead loading of the dust samples are **equal to or exceed** the lead hazardous to human health and clearance examination levels listed above and set forth in rule 3701-32-19 of the Administrative Code the area fails clearance.
  - The components that failed and those represented by the failed sample shall be re-cleaned.
  - Perform a reexamination of the residential unit(s), child day-care facility, or school following the procedures set forth in steps 1-5 listed above and retest the components represented by the failed sample.

7. Clearance Examination Report must contain the following as required in rule 3701-32-12 of the OAC
- The address of the residential unit, child day-care facility or school and, if only part of a multifamily property is affected, the specific dwelling units and common areas affected;
  - Name, address, and telephone number of the owner and manager of the residential unit, child day-care facility or the name, address and telephone number of the school principal;
  - The following information on the lead abatement or interim controls activity for which the clearance examination was performed:
    - a) Start and completion dates of the lead abatement or interim controls activity for which the clearance examination was performed
    - b) Name, address, and telephone number of the designated lead abatement contractor or lead abatement project designer for the project, or persons performing interim controls activity;
    - c) A detailed written description of all lead abatement, interim controls, locations where the activity was performed and suggested monitoring schedule of encapsulants, enclosures, and interim controls activity to maintain sufficient control of lead hazards. This can be in the form of the contractor's report or work specifications.
  - Clearance examination information:
    - a) Date of clearance examination or reexamination;
    - b) Name, address, license number, signature of person(s) performing clearance;
    - c) Findings of each visual assessment (Visual Assessment form HEA 7731) Dust sample results in  $\mu\text{g}/\text{ft}^2$ , by location of sample recorded on a diagram of the floor plan of the residential unit, child day-care facility or school;
    - d) Soil sample results in parts per million (ppm), include a plot plan indicating sample locations;
    - e) Water sample results parts per billion (ppb), indicate sample locations;
    - f) Name, address, approval number of laboratory that conducted the analysis of any dust, soil or water sample.

Any questions regarding this memorandum should be directed to the Lead Poisoning Prevention Program at 877-668-5323.

Attachments:

- Lead Hazard Control Visual Clearance Form 9/04
- Table 1.0 Residential Units: Clearance Area and Minimum Number and Location of Dust Samples
- Table 1.1 Child Day-care Facilities and Schools: Clearance Area and Minimum Number and Location of Dust Samples

Do NOT WRITE IN THIS SPACE

Sent date	Notification No.	By
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## Ohio Department of Health Prior Notification of Lead Training Course

Read carefully all the instructions and questions prior to completing the notification form

- Notifications shall be legibly completed and sent to the Ohio Department of Health, Attn: Lead Poisoning Prevention Program, 3rd floor, 246 North High Street, Columbus, Ohio 43215.
- Any provider of an approved lead training course within the state of Ohio shall notify the Director, in writing, of scheduled courses for the month by the tenth calendar day of the preceding month; non scheduled training courses at least one business day before the training course begins as required by 3071-32 and 3701-82 of the Ohio Administrative Code
- Type of notification:     original     cancellation     revision # \_\_\_\_\_

4. Course approval number	Expires				
Name of training	Initial	Refresher	Name of training	Initial	Refresher
Lead Core Course (LCC)	<input type="checkbox"/>	<input type="checkbox"/>	Lead Clearance Technician (LCT)	<input type="checkbox"/>	<input type="checkbox"/>
Lead Abatement Worker (LAW)	<input type="checkbox"/>	<input type="checkbox"/>	Lead Safe Renovator (LSR)	<input type="checkbox"/>	
Lead Abatement Contractor (LAC)	<input type="checkbox"/>	<input type="checkbox"/>	Lead Safe Renovator w/ EMP Module	<input type="checkbox"/>	
Lead Project Designer (LPD)	<input type="checkbox"/>	<input type="checkbox"/>	Essential Maintenance Practices w/ LSR Module	<input type="checkbox"/>	
Lead Inspector (LI)	<input type="checkbox"/>	<input type="checkbox"/>	Essential Maintenance Practices (LEM)	<input type="checkbox"/>	
Lead Risk Assessor (LRA)	<input type="checkbox"/>	<input type="checkbox"/>			

5. Name of training provider		
Address		
City	State	ZIP
Director	Telephone	

6. Training course instructors
_____
_____

7. Location of training course ( <i>specific</i> )		
Address		
City	State	ZIP
	<b>OHIO</b>	
Comments		

8. Training course dates							
Start	Completion			Hours of operation			
Days of the week	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday	Sunday

9. Name of person filing this notice	Date
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# Ohio Department of Health

## Lead Hazard Control Visual Clearance

Clearance date / /		Page _____ of _____	
Name of Clearance Examiner		License number	License expiration date / /
Name of property owner/manager		Property owner/manager phone	
Property address	City	State	ZIP
Lead hazard control start date / /		Date /time final cleanup completed	
Name of Contractor, Project Designer, Lead Safe Renovator or Essential Maintenance worker		Telephone	
Property address	City	State	ZIP

Check if a repeat examination

Room Identifier	List of building components to be treated in each room	Work on each component completed?	Visible paint chips seen?	Visible settled dust seen?	Additional work required?
		<input type="checkbox"/> Yes <input type="checkbox"/> No			
		<input type="checkbox"/> Yes <input type="checkbox"/> No			
		<input type="checkbox"/> Yes <input type="checkbox"/> No			
		<input type="checkbox"/> Yes <input type="checkbox"/> No			
		<input type="checkbox"/> Yes <input type="checkbox"/> No			
		<input type="checkbox"/> Yes <input type="checkbox"/> No			
		<input type="checkbox"/> Yes <input type="checkbox"/> No			
		<input type="checkbox"/> Yes <input type="checkbox"/> No			
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		<input type="checkbox"/> Yes <input type="checkbox"/> No			
		<input type="checkbox"/> Yes <input type="checkbox"/> No			
		<input type="checkbox"/> Yes <input type="checkbox"/> No			
		<input type="checkbox"/> Yes <input type="checkbox"/> No			
		<input type="checkbox"/> Yes <input type="checkbox"/> No			
		<input type="checkbox"/> Yes <input type="checkbox"/> No			
		<input type="checkbox"/> Yes <input type="checkbox"/> No			

Exterior soil  Treated  Not treated  
 If treated, is bare soil present?  Yes  No  
 Was contaminated soil removed?  Yes  No  
 Is additional soil treatment required?  Yes  No

Notes:  


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Clearance Examiner signature



# Ohio Department of Health • Lead Poisoning Prevention Program

## Lead Inspection/Risk Assessment/Clearance Examination Summary

1. Summary forms should be submitted by the 15th of each month for the previous month's activities. For example, if you conducted a lead risk assessment in January, you should submit a form by February 15th. A form is not required if no work was performed.
2. Please complete all parts of this form. This form will be returned if any information is lacking.
3. Please complete a separate line for each property address and each activity. For example, if you conducted a clearance examination at 111 Main Street and the examination initially failed, but passed upon reexamination, you should enter each examination as a separate line. One line should be completed for the failed examination and one line for the passed examination.
4. You should always indicate "yes" to the question "Was a lead hazard found" if the property failed clearance examination.
5. You should always indicate "no" to the question "Was a lead hazard found" if the property passed the clearance examination.
6. This form shall be used in accordance with division (D) of rule 3701-32-15 of the Ohio Administrative Code.

Monthly summaries shall be mailed by first class mail to: **Ohio Department of Health, DQA/Lead Program, 246 North High Street, P.O. Box 118, Columbus, OH 43216-0118.** You may also e-mail this report to: [lead@odh.ohio.gov](mailto:lead@odh.ohio.gov)

Summary for the period of (mo/yr)	Name of licensed Lead Inspector/Risk Assessor/Clearance Technician	License Number
Employer		Phone Number
Employer Address		Email address
City	State	ZIP

### Summary Information

1. Property address	City	State	ZIP
		OH	

What activities were performed?     Inspection     Risk Assessment     Inspection and Risk Assessment     Partial Inspection     Partial Risk Assessment  
 Clearance Examination    If Clearance was performed, did clearance area pass?     Yes     No  
 Was a lead hazard found?     Yes     No    Was constructed before 1950?     Yes     No

2. Property address	City	State	ZIP
		OH	

What activities were performed?     Inspection     Risk Assessment     Inspection and Risk Assessment     Partial Inspection     Partial Risk Assessment  
 Clearance Examination    If Clearance was performed, did property pass?     Yes     No  
 Was a lead hazard found?     Yes     No    Was constructed before 1950?     Yes     No

3. Property address	City	State	ZIP
		OH	

What activities were performed?     Inspection     Risk Assessment     Inspection and Risk Assessment     Partial Inspection     Partial Risk Assessment  
 Clearance Examination    If Clearance was performed, did property pass?     Yes     No  
 Was a lead hazard found?     Yes     No    Was constructed before 1950?     Yes     No

4. Property address	City	State	ZIP
		OH	

What activities were performed?     Inspection     Risk Assessment     Inspection and Risk Assessment     Partial Inspection     Partial Risk Assessment  
 Clearance Examination    If Clearance was performed, did property pass?     Yes     No  
 Was a lead hazard found?     Yes     No    Was constructed before 1950?     Yes     No

Signature of Inspector/Risk Assessor	Date

5. Property address	City	State <b>OH</b>	ZIP
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What activities were performed?  Inspection  Risk Assessment  Inspection and Risk Assessment  Partial Inspection  Partial Risk Assessment  
 Clearance Examination If Clearance was performed, did property pass?  Yes  No  
Was a lead hazard found?  Yes  No Was constructed before 1950?  Yes  No

6. Property address	City	State <b>OH</b>	ZIP
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What activities were performed?  Inspection  Risk Assessment  Inspection and Risk Assessment  Partial Inspection  Partial Risk Assessment  
 Clearance Examination If Clearance was performed, did property pass?  Yes  No  
Was a lead hazard found?  Yes  No Was constructed before 1950?  Yes  No

7. Property address	City	State <b>OH</b>	ZIP
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What activities were performed?  Inspection  Risk Assessment  Inspection and Risk Assessment  Partial Inspection  Partial Risk Assessment  
 Clearance Examination If Clearance was performed, did property pass?  Yes  No  
Was a lead hazard found?  Yes  No Was constructed before 1950?  Yes  No

8. Property address	City	State <b>OH</b>	ZIP
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What activities were performed?  Inspection  Risk Assessment  Inspection and Risk Assessment  Partial Inspection  Partial Risk Assessment  
 Clearance Examination If Clearance was performed, did property pass?  Yes  No  
Was a lead hazard found?  Yes  No Was constructed before 1950?  Yes  No

9. Property address	City	State <b>OH</b>	ZIP
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What activities were performed?  Inspection  Risk Assessment  Inspection and Risk Assessment  Partial Inspection  Partial Risk Assessment  
 Clearance Examination If Clearance was performed, did property pass?  Yes  No  
Was a lead hazard found?  Yes  No Was constructed before 1950?  Yes  No

10. Property address	City	State <b>OH</b>	ZIP
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What activities were performed?  Inspection  Risk Assessment  Inspection and Risk Assessment  Partial Inspection  Partial Risk Assessment  
 Clearance Examination If Clearance was performed, did property pass?  Yes  No  
Was a lead hazard found?  Yes  No Was constructed before 1950?  Yes  No

11. Property address	City	State <b>OH</b>	ZIP
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What activities were performed?  Inspection  Risk Assessment  Inspection and Risk Assessment  Partial Inspection  Partial Risk Assessment  
 Clearance Examination If Clearance was performed, did property pass?  Yes  No  
Was a lead hazard found?  Yes  No Was constructed before 1950?  Yes  No

12. Property address	City	State <b>OH</b>	ZIP
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What activities were performed?  Inspection  Risk Assessment  Inspection and Risk Assessment  Partial Inspection  Partial Risk Assessment  
 Clearance Examination If Clearance was performed, did property pass?  Yes  No  
Was a lead hazard found?  Yes  No Was constructed before 1950?  Yes  No

13. Property address	City	State <b>OH</b>	ZIP
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What activities were performed?  Inspection  Risk Assessment  Inspection and Risk Assessment  Partial Inspection  Partial Risk Assessment  
 Clearance Examination If Clearance was performed, did property pass?  Yes  No  
Was a lead hazard found?  Yes  No Was constructed before 1950?  Yes  No