



OHIO DEPARTMENT OF HEALTH

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John R. Kasich / Governor

Theodore E. Wymyslo, M.D. / Director of Health

TO: All Licensed Lead Abatement Contractors
All Licensed Lead Abatement Project Designer
All Approved Lead Training Providers

FROM: David E. Holston, Chief
Environmental Abatement Section *DH 8/26/11*

SUBJECT: Revised Lead Abatement Project Inspection Report Form

DATE: August 26, 2011

Enclosed are the new Lead Abatement Project Inspection Report and Lead Abatement Project License and Records Log. These forms will be used for all Ohio Department of Health (ODH) lead abatement project inspections starting on September 1, 2011. These forms are printed on NCR paper which will allow the ODH inspector to give a copy of the forms to the contractor or project designer on site for their records.

The compliance items on the Inspection Report reflect the requirements of the Ohio Administrative Code (O.A.C.) Chapter 3701-32, the Department of Housing and Urban Development (HUD) "Guidelines for the Evaluation and Control of Lead-Based Paint Hazards in Housing" and the Occupational Safety & Health Administration (OSHA) 29 CFR 1926.62. According to O.A.C. 3701-32 contractors and project designers are required to conduct each project in accordance with these regulations.

Over the past year during our inspections, ODH inspectors have frequently found that the following required items are not being addressed at lead abatement projects:

- Original notifications are not revised to reflect accurate project information. Revisions to notifications shall be submitted for any and all changes that differ from the original notification. Examples include revising start dates, completion dates, days of operation and hours of operation to reflect any scheduling changes (see item 1 on included inspection report).
- An ODH licensed lead abatement contractor or lead abatement project designer is not onsite at all times during required phases of work that includes worksite preparation and post-abatement clean-up (see item 2 on included inspection report).
- All recordkeeping, documentation, and pre-abatement plans are not onsite for the entire duration of the lead abatement project (see items 3, 4, and 8 on included inspection report).
- All lead abatement worksite preparation is not performed in accordance with HUD Guidelines Chapter 8, Tables 8.1, 8.2, 8.3 (see item 5 on included inspection report).
- All employees performing lead abatement do not have either a negative exposure assessment or proper documentation for usage of respiratory protection during all lead abatement activities to ensure that all employees are adequately protected (see items 3, 8 and 9 on included inspection report).
- All residents and occupants are not being kept out of lead abatement work areas. Re-entry is only permitted after the work areas have been cleaned and clearance has passed (see items 5 and 12 on the included inspection report).

The new inspection report should help ensure that these items are properly addressed during future ODH inspections. Please review it and use it as a checklist at your projects to ensure compliance with O.A.C. Chapter 3701-32.

If you have any questions or concerns regarding this memorandum or the new forms call Mark Needham or Josh Koch at (614) 466-1450.

Ohio Department of Health
Lead Abatement Project Inspection Report

Project Location		Date
Project ID #	Contractor / Project Designer	License #
Name and Signature of Receipt of Report (Print & Sign)		License #

Occupancy Status (Check all that apply)

Vacant
 Occupants relocated daily
 Bathroom access available
 Occupants present at time of inspection
 Kitchen access available
 Unknown

Lead Inspection / Risk Assessment

Was a lead inspection or risk assessment conducted?
 Yes
 No
 Unknown

If Yes, Date: _____ Licensee: _____ License #: _____

Lead Hazard Control Order (LHCO)

Was a LHCO issued?
 Yes
 No
 Unknown

If Yes, Date: _____ Issuing Authority: _____

An inspection of your project today has shown the item(s) marked below with an "X" are not in compliance and represent violation(s) of Chapter 3701-32 of the Ohio Administrative Code (O.A.C.). Violations of the O.A.C. may lead to the director taking action against your lead abatement contractor or project designer license.

<p>1. Prior Notification</p> <input type="checkbox"/> Start dates <input type="checkbox"/> Completion dates <input type="checkbox"/> Days of operation <input type="checkbox"/> Hours of operation <input type="checkbox"/> Project address	<p>5. Worksite Preparation (HUD Chapter 8, Tables 8.1, 8.2, 8.3)</p> <input type="checkbox"/> Pre-cleaning <input type="checkbox"/> Resident location/access requirements <input type="checkbox"/> Containment/barrier system in place <input type="checkbox"/> Warning signs properly posted <input type="checkbox"/> Ventilation systems turned off <input type="checkbox"/> Ventilation systems appropriately sealed <input type="checkbox"/> Furniture removed <input type="checkbox"/> Furniture sealed with a single layer of plastic <input type="checkbox"/> Playground equipment, toys, sandbox removed <input type="checkbox"/> Playground equipment, toys, sandbox sealed with plastic sheeting <input type="checkbox"/> Plastic secured to side of building <input type="checkbox"/> Fencing/barrier tape around work area	<p>8. Exposure Monitoring</p> <input type="checkbox"/> Personal air monitoring records maintained at worksite and performed within past 12 months <input type="checkbox"/> Air sample analysis performed by approved laboratory
<p>2. Licensed Contractor or Project Designer</p> <input type="checkbox"/> On Site during worksite preparation <input type="checkbox"/> On Site during post-abatement cleanup <input type="checkbox"/> Available for immediate consultation <input type="checkbox"/> On Site or On Site within 2 hours	<p>6. Worksite Activities</p> <input type="checkbox"/> Hand washing station available <input type="checkbox"/> Debris stored in locked secure area outside of dwelling <input type="checkbox"/> No prohibited methods in use	<p>9. Respirator Use</p> <input type="checkbox"/> Respirator being worn when required <input type="checkbox"/> Respirator stored properly when not in use
<p>3. License and Records, On Site</p> <input type="checkbox"/> Daily sign-in log *If item is marked, see the attached log sheet: * <input type="checkbox"/> Valid license card * <input type="checkbox"/> Physician's written opinion * <input type="checkbox"/> Respirator fit test dates	<p>7. Worksite Cleanup</p> <input type="checkbox"/> Ongoing/daily cleaning performed <input type="checkbox"/> Proper cleaning procedures utilized (HEPA vacuum, wet wash, HEPA vacuum) <input type="checkbox"/> Post-abatement cleaning performed	<p>10. Worker Protection/Hygiene (if > PEL)</p> <input type="checkbox"/> No smoking, food/beverage consumption, or cosmetic application in work area <input type="checkbox"/> Clean change area established <input type="checkbox"/> Shower facilities provided <input type="checkbox"/> Eating areas provided <input type="checkbox"/> Appropriate personal protection equipment worn
<p>4. Pre-abatement Plan, On Site (project specific)</p> <input type="checkbox"/> Occupant protection plan <input type="checkbox"/> Compliance plan <input type="checkbox"/> Respiratory protection plan <input type="checkbox"/> Hazard communication plan		<p>11. Encapsulation Product</p> <input type="checkbox"/> Approved encapsulation product in use <input type="checkbox"/> Patch test performed
		<p>12. Clearance</p> <input type="checkbox"/> Ensure clearance examination performed <input type="checkbox"/> Residents permitted into work area only after cleaned & clearance passed

Remarks

Yes No Project meets minimum requirements of 3701-32 OAC.

Inspector	Date of Inspection	Time of Inspection
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