

ANNUAL MONITORING

CHILDHOOD LEAD POISONING PREVENTION PROGRAM .3100 RULES

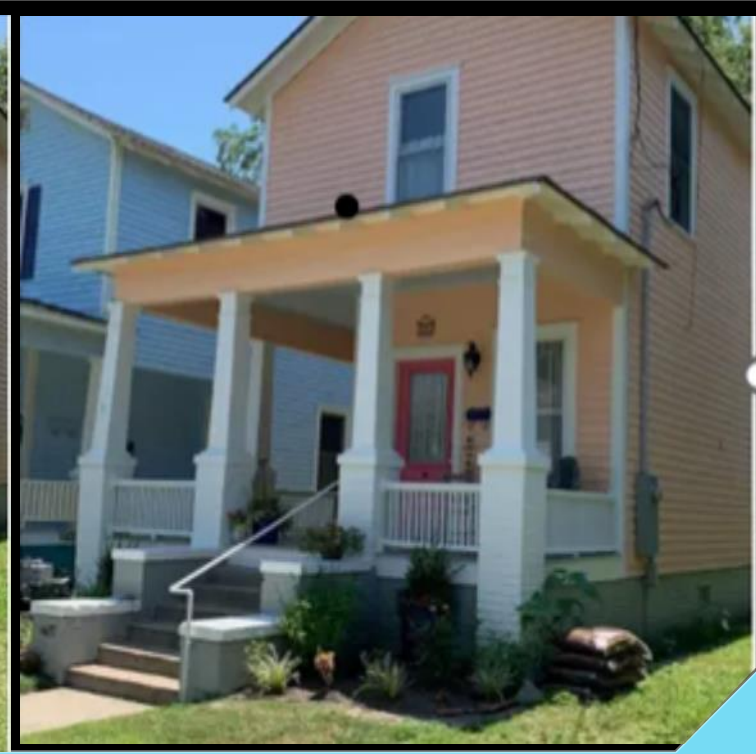
Brenda Bass, REHS Children's Environmental Health



Day before
Remediation Begins



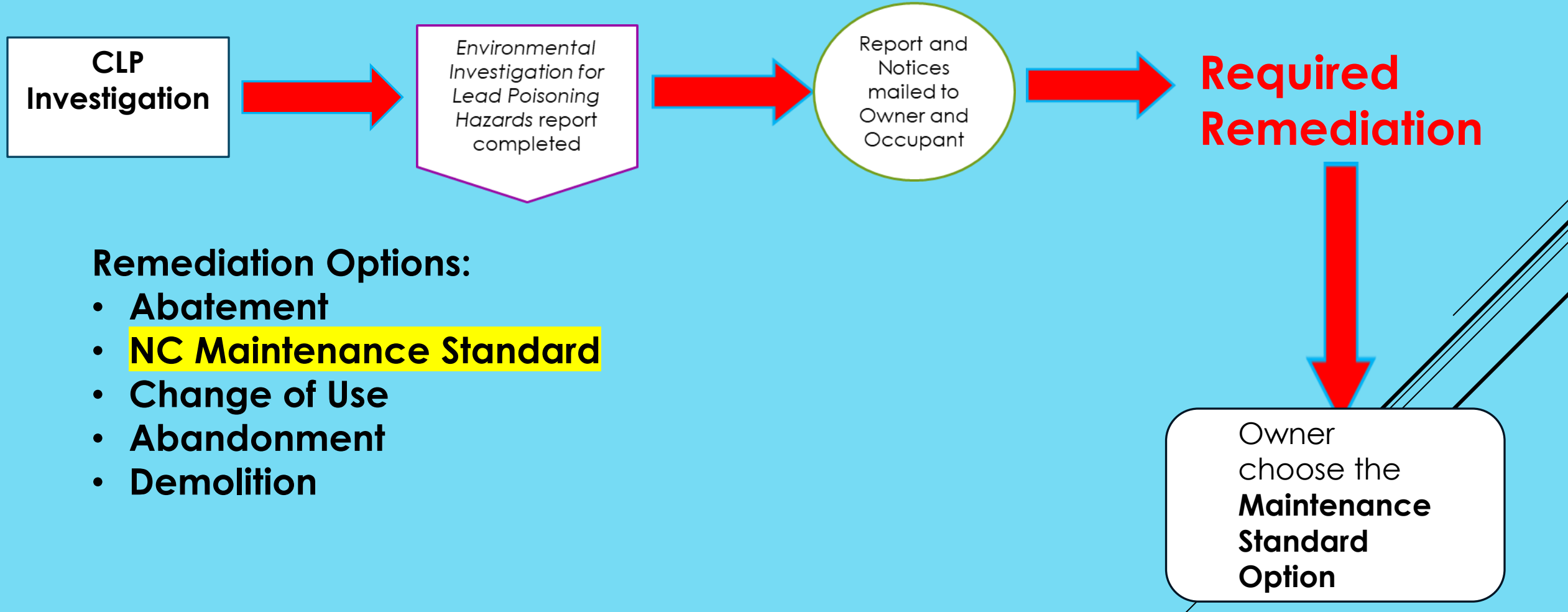
Day of the
Clearance
Inspection



Day of the
Annual
Monitoring
Inspection

WHAT IS ANNUAL MONITORING?

ANNUAL MONITORING



REMEDICATION (NCGS 131.9C)

(j1) Compliance with the maintenance standard satisfies the remediation requirements for confirmed lead poisoning cases identified as long as all lead poisoning hazards identified on interior and exterior surfaces are addressed by remediation.

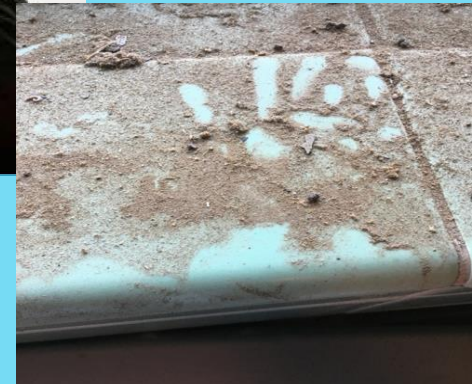
Except for owner-occupied residential housing units, continued compliance shall be verified by means of an **annual monitoring inspection** conducted by the Department.

This form of remediation (Maintenance Standard) requires annual monitoring.

*.31 10(d) For residential housing units subject to abatement and remediation requirements in which children less than six years of age have resided in or regularly visited within the past year, **the Department shall conduct visual inspections and residual lead dust monitoring to verify continued compliance with the maintenance standard annually** and at any other time the Department deems necessary to carry out the provisions of G.S. 130A-131.7 or these Rules.*

THE GOAL OF ANNUAL MONITORING

- ❑ Annually assess the property for continued compliance of the maintenance standard after the initial clearance inspection
- ❑ Verifies that work and methods used in accordance to the approved plan are still in compliance.
- ❑ Restrict the reintroduction of lead hazards- deteriorated paint, paint chips, lead in water, lead dust, or contaminated soil



Annual Monitoring(AM) Procedures and Protocol:

- Once the initial Clearance inspection is completed, establish NC LEAD ANNUAL MONITORING event.
- Send notification 2 months prior to annual monitoring date.
- Coordinate Annual Monitoring date with both the Regional Specialist and the owner.
 - Contact the owner in reference to property status(occupied, vacant)
- Verify property is ready for AM
 - May require a site visit prior to sampling date.
 - Conduct a visual verification to see if remediation is still in accordance to the approved remediation plan. If not, discuss the findings with the Regional Specialist and then issue a modification plan.
- Assist the Regional Specialist with sampling and labeling.
- Secure the samples and submit them to the lab with the Chain of Custody.
- Notify owner/ occupants of results. Send out the appropriate Notice.
- Document into NCLEAD.
- Set-up Annual Monitoring inspection in NCLEAD

THE ANNUAL MONITORING INSPECTION

Step 1 Visual Inspection

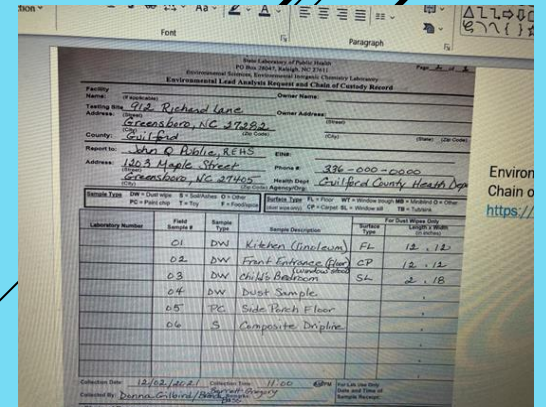
.3101(7) "Visual inspection" means an on-site assessment by the Department, or its agent authorized pursuant to 15A NCAC 01O .0101(4) to determine compliance with the approved remediation plan as set forth in G.S. 130A-131.9C.

If during the visual inspection, it is noted that the work is not in compliance with the approved plan or remediation methods have deteriorated, additional work or modification to the plan may be required. Additional testing may also be required.



Step 2 Sampling

Sampling is conducted only after it is determined that all remediation is still in compliance according to the plan. Visible debris, paint chips, dust or deteriorated paint will result in a failed visual. Additional lead dust clean-up will be required before sampling is conducted.



Sample Location	Sample Type	Sample Description	Result	Notes
01	DW	Kitchen (Floor)	FL	1.2, 1.2
02	DW	Front Entrance (Floor)	CP	1.2, 1.2
03	DW	Child's Bedroom (Floor)	SH	1.2, 1.2
04	DW	Dust Sample		
05	PC	Side Porch Floor		
06	S	Composite Driveway		

Question: Notification is received that it's time for annual monitoring of one of the county's properties. What steps do you take?

- **Review the approved remediation plan**
- **Coordinate Annual Monitoring date with both the Regional Specialist and the owner.**
- **Contact the owner in reference to property status (occupied, vacant)**
- **Verify property is ready for AM**
 - May require a site visit prior to sampling date.
 - Conduct a visual verification to see if remediation is still in accordance with the approved remediation plan.

Question: During the visit prior to annual monitoring, when reviewing the approved plan, you note that the remediation method used on all exterior siding of the house was paint stabilization. At the visit, you see flaking peeling paint on the exterior siding.

What do you do?



You note that the siding on the property is not intact. Also, you look around the property for any paint chips on bare soil areas or areas where children would play. Based on your visit the property has failed the visual inspection, and the owner will need to correct issues noted during the visit.



New windows were installed

Question: During the follow-up visit, prior to annual monitoring, you notice that all the windows have been replaced with new ones. The approved plan for the initial clearance stated that windows were remediated using friction impact treatment.

What do you do?

The HD must issue a modification order to owner requiring modification to the remediation plan. The homeowner or managing agent will need to submit a modified plan to HD prior to the annual monitoring inspection. Remember clearances and annual monitoring inspections are based on the visual in accordance with the plan and then environmental sampling.

How can residential housing units be exempt from Annual Monitoring?

- Per GS 131.9C (j1)

For **owner occupied** residential housing units, **continued** compliance shall be verified :

- i. by means of an annual monitoring inspection **OR**
- ii. **by providing notarized documentation that no child less than six years of age and no pregnant woman has resided in or regularly visited the residential housing unit within the past year, **OR****
- iii. **by providing notarized documentation that no child less than six years of age and no pregnant woman residing in or regularly visiting the unit has an elevated blood lead level.**

WHAT REMEDY IS AVAILABLE FOR CONTINUED FAILURE OF THE MAINTENANCE STANDARD?

.3106(a)..... the Department may require abatement of lead-based paint hazards and remediation of other lead poisoning hazards identified at a residential housing unit that is occupied or regularly visited by a child less than six years old who has confirmed lead poisoning when:

(1) a visual inspection reveals that the owner or managing agent has failed to continue to comply with the maintenance standard;.....



Annual Monitoring in School Buildings



Since all the areas of a school may not have been subject to the lead investigation, when conducting the annual monitoring of a school, each year, a documentation request should be made requesting all accessible areas to children under the age of 6 be identified. Any changes to the accessible area documentation may require additional testing if these areas have not been assessed.



He does not look happy to see us.

QUESTIONS?

TENA WILL NOW GO OVER HOW TO SET UP ANNUAL MONITORING IN NC LEAD