

What You Can Expect from a Lead Paint Risk Assessment

What Is a Lead-Based Paint Risk Assessment?

According to Michigan Law a Lead-Based Paint Risk Assessment is defined as, “An on-site investigation to determine the existence, nature, severity, and location of lead-based paint hazards, and the provision of a report by the individual conducting the risk assessment explaining the results of the investigation and options for reducing lead-based paint hazards” (see Tables 1 and 2 below for hazard levels in dust, soil, and water). A Risk Assessment is done to show if a house or apartment is lead-safe, or not lead-safe, for young children. It also tells what must be done to fix any lead paint hazards found. A Risk Assessment alone will not identify all lead painted surfaces in a house or apartment. A combination Lead Paint Inspection and Risk Assessment will identify all lead based paint and all lead-based paint hazards.

Who Can Do a Risk Assessment?

Only a person certified by the Michigan Department of Health and Human Services (MDHHS) may do a Lead Risk Assessment. A real estate home inspector cannot do this service unless that person is certified by MDHHS. Persons certified by the State of Michigan are issued a certification card containing the person’s picture, name, certification number, and expiration date. The status of a person can be verified by calling (517)335-9390 or toll-free (866)691-LEAD. In addition, this information is listed on the Department’s website at www.mi.gov/leadsafe or an individual can be verified at www7.dleg.state.mi.us/free.

How Is a Risk Assessment Performed?

The Risk Assessor will conduct a visual inspection of the house or apartment to find any paint that is peeling, cracking, chipping or chalking. He will determine the extent and causes of the paint in poor condition, and evaluate other potential lead paint hazards. The Risk Assessor will collect background information regarding the physical condition of the property, and use patterns of the residents in the house or apartment that may cause exposure to lead paint hazards.

In a single-family home, the Risk Assessor should test for lead on each surface that has deteriorated paint, shellac, varnish or stain. The individual should also test any other surface for lead if the surface is determined to be a potential lead paint hazard. Other surfaces may include friction surfaces of windows and impact surfaces on doors and door frames. In day care centers, preschools or kindergarten classrooms, the Risk Assessor should test rooms used by children, such as classrooms, cafeterias, and gyms. They should also test playground equipment and the soil where children play.

In a single-family home, the Risk Assessor should collect dust samples from a window and floor in all living areas where young children are most likely to come in contact with dust (in at least 6 rooms). In apartment buildings the deteriorated paint should be tested and dust samples taken in the apartments chosen to be tested. Common areas such as hallways, stairways, and laundry rooms where children are likely to come in contact with lead contaminated dust should also be tested.

Paint, dust and soil are required to be tested for a Risk Assessment. Water testing is optional but may be requested. For all testing the Risk Assessor must use lead sampling methods or instructions that are approved by the U.S. Department of Housing and Urban Development (HUD) www.hud.gov/lead and/or the U.S. Environmental Protection Agency (EPA) www.epa.gov/lead. References can be found at their websites or you may go to the Healthy Homes Section at www.mi.gov/leadsafe or call 517-335-9390.

Paint, dust, and soil samples must be analyzed by a lab approved by EPA through the National Lead Laboratory Accreditation Program (NLLAP). Labs can be verified: www.epa.gov/lead/pubs/nllaplist.pdf or by calling the National Lead Information Center at (800)424-LEAD.

According to Michigan law color changing lead detection test kits cannot be used on paint, dust or soil to

determine lead content for a Risk Assessment. These kits include swabs, sticks or liquid drops that turn color when they come in contact with lead-containing surfaces.

What Does a Risk Assessment Report Contain?

The risk assessor must prepare a Risk Assessment report. The report must include:

- Specific locations of each painted component tested for lead.
- Results from testing equipment used.
- All results from the laboratory analysis of collected paint, soil, and dust samples.
- Any information regarding the condition of the property and use patterns of the residents that may cause lead paint exposure to young children.
- A description of the location, type, and severity of identified lead paint hazards and any potential hazards.
- A description of temporary and/or permanent options to remove each hazard found, and a priority for removing each hazard from the most serious to the least. If an encapsulant, paint, or enclosure (siding or drywall) is recommended, then the report should provide a re-evaluation and monitoring schedule for each option. This will insure that the home remains safe into the future.

According to Michigan law, the Risk Assessment report must be given to the property owner, or the person who contracted for the service, within 20 days. The individual conducting the Risk Assessment must keep a copy of the report on file for a minimum of three years.

The Risk Assessment report will be helpful in deciding whether the housing unit is lead-safe for young children to live in. Risk Assessments reports of day care centers, preschools or kindergarten classrooms, etc. can be used to determine safety for young children to occupy those facilities during the day. A Risk Assessment can also satisfy lead disclosure requirements for real estate transactions.

The Risk Assessment report must list locations tested for lead and the results of the testing. The results will be numbers with units of measurement. The units are different for paint, dust, soil and water. EPA and HUD regulations define lead-based paint and lead-based paint hazards levels with the values and units of measurement listed in the following tables:

Table 1: Lead Hazard Levels for Soil and Water	
Material Tested	Considered hazardous if lead is present at or above these levels
Bare soil (child play areas)	At or above 400 parts per million (ppm) of lead in the soil
Bare soil (other areas)	At or above 1200 ppm of lead
Water	equal to or more than 15 parts per billion (ppb) of lead in water

Table 2: Lead Hazard and Clearance Levels for Dust	
House dust (floors)	At or above 40 micrograms of lead per square foot of sampled area (ug/ft ²)
House dust (window sills)	At or above 250 ug/ft ² of lead
House dust (window troughs)	At or above 400 ug/ft ² of lead

Table 3: Definitions of Lead-Based Paint	
Paint tested by an X-Ray Fluorescence (XRF) analyzer	equal to or more than 1.0 milligrams per square centimeter (mg/cm ²) of lead on the sampled surface
Paint tested by paint chip analysis	equal to or more than 0.5% (one half of 1 percent) lead by dry weight, or equal to or more than 5,000 parts per million of lead in paint (ppm)

Contact Information

Complaints about improper work practices can be made by calling the Healthy Homes Section at (866)691-5323 or (517)335-9390. Names of those making complaints will not be released.

NOTE: this document intended for homeowner education. Complete information about Michigan lead laws and rules is available at the website listed above.

The Program's website address is www.michigan.gov/leadsafe.

Mailing address: MDHHS - Healthy Homes Section, P.O. Box 30195, Lansing, Michigan 48909