

Review of the Regulatory Timelines of an Epidemiological Investigation

- Objectives:**
- Highlight regulatory timelines
 - Seek compliance in meeting timelines/deadlines
 - Define terms
 - Explain regulatory forms/letters

Definitions:

Epidemiological investigation-an examination and evaluation to determine the cause of elevated blood lead levels. An epidemiological investigation will include an inspection conducted by a lead inspector to detect lead-based paint and report of findings. This investigation must also include evaluation of other sources such as soil, dust, pottery, gasoline, toys, or occupational exposures, to determine the cause of elevated blood lead levels. The investigation may also include isotopic analysis of lead-containing items.

A venous blood lead level greater than or equal to 20 µg/dl triggers the requirement to conduct an Epidemiological Investigation per GCS 19a-111. All possible sources of lead exposure must be investigated.

An Epidemiological Investigation is triggered by:

- A venous blood lead level greater than or equal to 20 µg/dL triggers the requirement to conduct an Epidemiological Investigation per CGS 19a-111
- All possible sources of lead exposure must be investigated

An Epidemiological Investigation Includes:

- Comprehensive Lead Inspection
- Epidemiological Investigation Form

Comprehensive Lead Inspection - identifies lead based painted surfaces and hazards. Includes XRF testing, dust, water & soil collection and analysis. Additionally, evaluate other non-environmental sources.

Epidemiological Investigation Form - identifies potential lead exposures and/or factors that could causes a child to have a high BLL. The current version of the Epi form is dated 3/8/15 and is on the DPH website.

Notification of Blood Lead Levels

Blood Lead Level results received from:

- Laboratories- must report $\geq 10\mu\text{g}/\text{dL}$ within 48 hours
 - ❑ CGS §19a-110(a)
- Pediatrician $\geq 15\mu\text{g}/\text{dL}$ via #PD-23 form
 - ❑ CGS §19a-2-a(9), CGS§19a-215
 - ❑ RSCA §19a-36-A1 through §19a-36-A4
- Lead Surveillance System (LSS)- contains all lead levels

[The clock starts HERE](#)

Initiate an Epidemiological Investigation

1. Schedule epidemiological interview
2. Conduct comprehensive lead inspection
 - Document all communication (phone, letter, fax)

❑ RSCA §19a-111-3(c)(1) & CGS §19a-111

[Initiate within 5 working days after notification of BLL](#)

Complete Epidemiological Investigation

- Complete Epi Form
- Complete comprehensive lead inspection
 - ✓ Test all painted surfaces
 - ✓ Take samples of dust, bare soil and water
 - ✓ Receipt of all laboratory results
- Inspection results must be entered into the LSS

Completed within 30 working days from notification of BLL

Inspecting "Other" Dwellings

- Must occur if a child <6 lives in the same building as an Environmental Intervention Blood Lead Level (EIBLL)
- Must be a comprehensive lead inspection and include testing of all surfaces

- ❑ RSCA §19a-111-3(c)(2)
- ❑ RSCA §19a-111-2(a)(b)(d)(e)

Begin within **30 days** from notification of BLL - complete ASAP

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Lead Inspection and Testing Summary Form (LITSF)

After completion of Investigation.....

Submit LITSF to:

- Property Owner
- DPH Commissioner
- Director of Health (DOH)

- ❑ CGS §19a-111j
- ❑ RCSA §19a-111-3(d)

Must be submitted within **2 working days** of completion of the inspection

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Notification Sign

Posted at every entrance by property owner

Template can be found at:
www.ct.gov/dph/lead/LHDResources

- ❑ RCSA §19a-111-3(e)

Must be posted **2 days** after receipt of inspection report

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Lead Abatement Order

Must be:

- Issued & Signed by DoH
- Sent to Property Owner
 - ✓ By certified mail with return receipt

Important date!!

- Enter date issued into the LSS

❑ CGS §19a-111
❑ CGS §19a-111j

Completed within 30 working days from notification of BLL

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What do you do if you have not received an environmental lab from the DPH Lab within 30 days from the notification of an EIBLL?

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Answer:

- The abatement order **must** be sent within 30 days for all lab results that have been reported to the LHD and identify lead hazards
- After receipt of **all** environmental labs
 - ✓ Send addendum to order letter for identified lead hazards

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What is the "Notification of Inspection Results" date?

Answer:

- The date that Property Owner received the Lead Abatement Order
- Date from return receipt of certified mail (green card)

Important reference date

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What is required when a property is ≥50 years old?

19a-111-3 (g) states, "the owner shall within 5 working days after completion of the inspection report postmark or hand deliver of an inspection report and a good quality photograph of the property to the Connecticut Historical Commission.* The commission will determine...which lead abatement techniques are appropriate for historic properties...The commission shall within 10 working days after receipt of the inspection report and photograph send by 1st class mail a written report of the building's historic status"

* New Name: The State Historic Preservation Office

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Lead Management Plan

- Must be completed for intact leaded surfaces
- Must be completed for encapsulated surfaces
- Must be completed for all abated soil areas
- Must be submitted by property owner

Template can be found at:
www.ct.gov/dph/lead/LHD Resources

☐ CGS §19a-111j

☐ RSCA §19a-111-2(e)

Must be submitted by property owner 60 days after receipt of notification of inspection results

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Lead Abatement Plan

- Submitted by property owner
- Completed by:
 - ✓ Property Owner
 - ✓ Certified Planner Project Designer
- Enter date received by LHD into the LSS

- ☐ CGS §19a-111j
- ☐ RCSA §19a-111-5(a)

Submitted within 15 working days of notification of inspection results

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Review Lead Abatement Plan

- Document date Lead Abatement Plan received in LSS
- Review Abatement Plan
 - ✓ Make sure appropriate abatement methods are used
 - ✓ Verify contractor licenses
- Enter date the plan was approved into the LSS

- ☐ CGS §19a-111j
- ☐ RCSA §19a-111-5(a)

Approve or reject within 10 working days of receipt

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Start of Lead Abatement

- Approved Lead Abatement Plan
- Know actual start date (from approved plan)
- Recommend site visit(s) during abatement
- Notify DPH for possible 402 site visit (audit licensed workforce)
- Verify Licensed Lead Abatement Contractor
- Enter start date into the LSS

- CGS §19a-111j
- RCSA §19a-111-5(a)

Abatement shall begin within 45 working days from notification of inspection results

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Lead Abatement is Complete

- Completed in a timely manner (< than 1 year)
- Document progress
 - ✓ Communicate w/property owner regularly
 - ✓ Set up monthly monitoring schedule
- Enter abatement completion date into the LSS

- CGS §19a-111j
- RCSA §19a-111.5

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Re-Inspection

(visual verification abatement plan was followed and work is complete)

- LHD notified Lead Abatement is complete
- LHD must conduct a re-inspection
 - ✓ Verify all work was done per abatement plan
- Collect clearance dust wipes (LHD/Consultant)
 - ✓ Well, sill, & floor in each room or area abated
 - ✓ Floor sample 10ft from entrance of abated areas
- Enter date into the LSS

- CGS §19a-111j
- RCSA §19a-111-3(h)(1)

Completed 10 working days after notification of completion of lead abatement

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Letter of Compliance

The following info must be in the letter:

- Date(s) of re-inspection
- A statement noting that ALL lead hazards were abated per the approved abatement plan
- Dust levels are below the clearance dust wipe standards
- Include statement that the management plan for intact leaded surfaces must be followed (if applicable)

□ RCSA §19a-111-4(f)

Can be completed by a Local Health Department Code Enforcement Official (LHD CEO) or Lead Consultant

Mailed within 5 working days after work verified as complete, and no dust hazards

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Post Abatement Inspection Report

- Completed by LHD CEO **ONLY**
- Send Post Abatement Inspection Report
 - ✓ Property owner
 - ✓ DoH
 - ✓ Commissioner
- Enter date into the LSS

CGS §19a-111j
 RSCA §19a-111-3(h)(1)

Mail within 2 working days after re-inspection is completed

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LHD CEO **CAN** issue a
combined Letter of Compliance
and
Post Abatement Inspection Report

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