

## ***Local Lead Law Implementation: Providing Technical Assistance for Municipal Enforcement Officials***



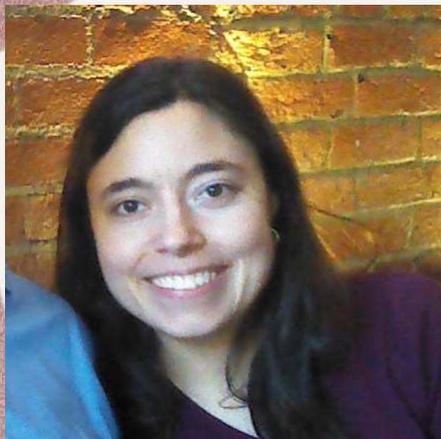
New England Lead  
Conference

November 5, 2015

## ***Childhood Lead Action Project***



- Founded in 1992
- Providence, RI
- Dedicated to eliminating childhood lead poisoning through education, parent support, and advocacy



Laura Brion, Director of Community Organizing and Advocacy

Childhood Lead Action Project

1192 Westminster St

Providence, RI 02909

[laura@leadsafekids.org](mailto:laura@leadsafekids.org)

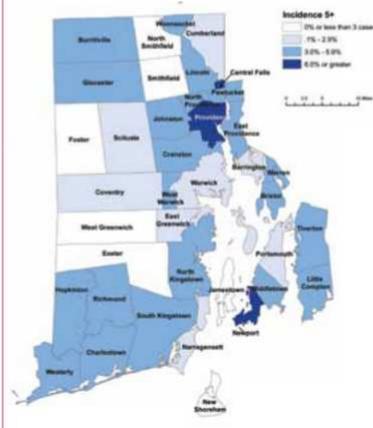
(401) 785-1310, x 205

## ***Lead Poisoning in Rhode Island***

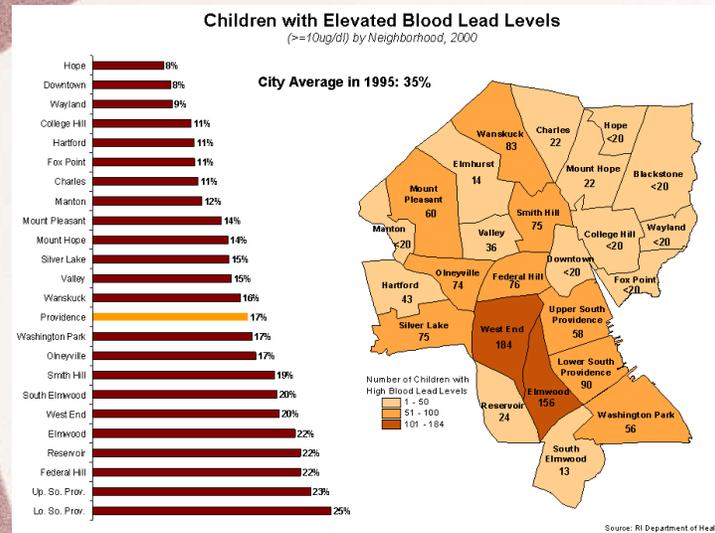
FIGURE 32  
2011 INCIDENCE RATE OF A BLOOD LEAD LEVEL  
 $\geq 5 \mu\text{g/dL}$  IN RHODE ISLAND

Prepared by The Providence Plan

Source: Lead Elimination Surveillance System, Rhode Island Department of Health



# Lead Poisoning in Providence



## Presentation Overview

- Intro: Opportunities for Local-Level Lead Law Enforcement in Rhode Island
- Case Studies: Providence, Central Falls, Pawtucket
- Process: Building Support for Enforcement
- Process: Training/Technical Assistance

## ***Lead-Safe Rental Housing: Local Responsibilities/Opportunities***

- Enforce lead-related housing code provisions
  - In RI, this includes the requirement that most pre-1978 rental housing be free of lead *hazards* (but not free of lead)
  - Proof of lead law compliance: lead certificate issued by a licensed lead inspector

## ***Lead-Safe Work Practices: Local Responsibilities/ Opportunities***

- Require lead license for building permit applicants when RRP applies
  - Inspired by Burlington, Schenectady, others

## *Providence*



Began lead law enforcement in late 2011

## *Providence*

The incidence of lead poisoning (new cases) in Providence **dropped nearly 25%** between 2012-2013

Every city and town in Rhode Island should be enforcing lead laws.

## ***Central Falls***



- Began lead law enforcement 4/1/14

## ***Pawtucket***



- Began lead law enforcement 1/1/15

## ***Building Support for Local-Level Lead Enforcement***

### Recommendations:

- Assemble a team
  - Prioritize invitations to people who are strongly motivated to work on lead
  - Think about what each partner can do to help
- Do your homework
  - Make sure you know what can be done with the laws on the books

## ***Building Support for Local-Level Lead Enforcement***

### Recommendations:

- Be realistic about challenges
  - This will involve a *little* extra work
  - Some community members will be grumpy about this
- Get/offer help
  - Training, technical assistance
  - Materials for the public
  - Sample NOVs, etc.
  - Referral resources – HUD programs, etc.

## ***Building Support for Local-Level Lead Enforcement***

### Recommendations:

- Know your audience
  - Protecting kids – the right thing to do
  - Level playing field for RPP-compliant contractors/HC-compliant landlords
  - Reduce city's liability
  - Required by law

## ***Initial Training***

- Bring your team! An offer of help means a lot more in person . . .
- Acknowledge the work already happening/expertise in the room
- Get people thinking, talking, practicing
- Set realistic goals for info retention
- Bring cheat sheets, charts, etc.
- Group process: planning enforcement protocol that will **work**

## ***SAMPLE: Today's Training***

- Basics: What is Lead Poisoning?
- Lead safety laws: Work Practices
- Lead safety laws: Housing Code
- Community Resources
- Discussion: Getting to Zero

## ***SAMPLE: Process***

- Step-by-step explanation
- Hands-on exercise(s)
- Review

## ***SAMPLE: Goals***

Three hours from now, you will be able to:

- Name 2+ lead-related code violations
- Look up a housing unit online to determine whether it has a valid lead certificate
- Tell a local worker what the first step is towards getting an RRP license
- Tell a local homeowner about 2+ ways to get financial assistance for lead abatement

## ***Followup: getting things off the ground***

- Get/provide help by phone, email, in person
- Collect/review enforcement data
- Identify & solve problems
- Identify & celebrate victories
- Look for opportunities to collaborate

## ***FYQs***

(Frequently Yelled Questions)

## ***“This is Somebody Else's Job”***

- Put local effort in context
  - Big chart: local, state, federal
  - Have state officials in the room
  - Discuss reasons why local work is important & needed
- Name and validate underlying concerns

## ***Victim blaming: pre-emptive action***

- Introduce the topic as a history lesson
  - Talk about the lead industry and its successful attempts to dehumanize victims and maximize profits
  - You can do this in 60 seconds or less
- Use the word “racism”. If time allows: sexism, classism, greed.

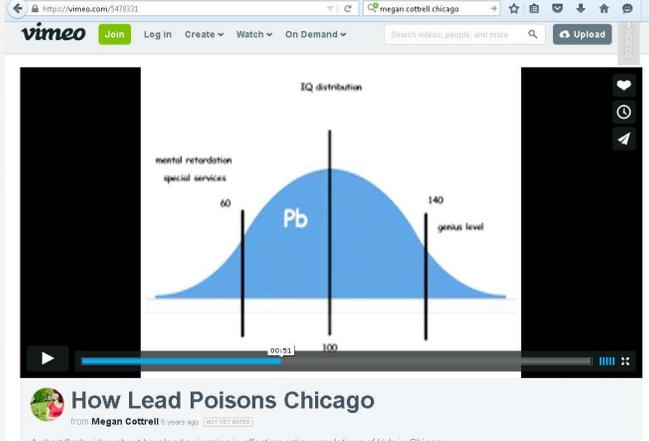
## ***Victim blaming: dealing with outbursts***

- Intervene ASAP
- Shift the conversation from a debate into an exercise
- Remind people of the big picture: nobody should have to live in a home that sheds poison from the walls
- Be realistic about your goals for the conversation

## *Defensiveness: lead was such great paint!*

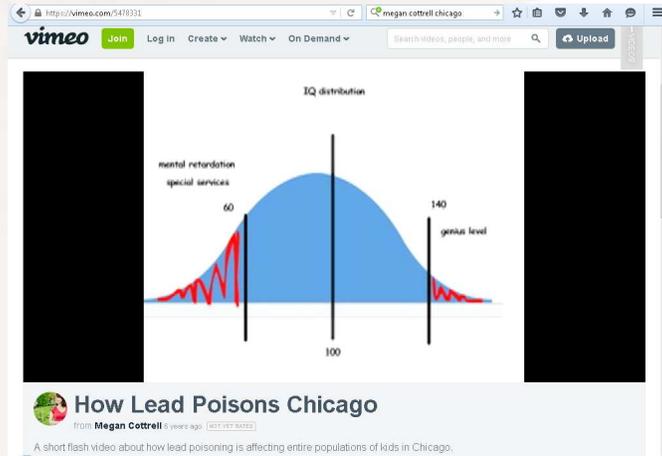
- **Validate** the statement – it's true!
- Add more info – show you know your stuff, invite people to share more
- Add context, get back on track: “as great as lead paint is, it's definitely not worth the trade-offs”

*“But . . . we all grew up here . . . ”*

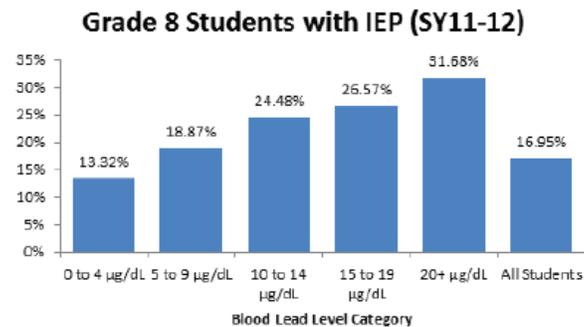


The screenshot shows a Vimeo video player interface. The video content displays a normal distribution curve representing IQ distribution. The curve is blue and centered at 100. A vertical line is drawn at 60, labeled "mental retardation special services". Another vertical line is drawn at 140, labeled "genius level". The area under the curve between 60 and 140 is shaded light blue and labeled "Pb". The video player includes a progress bar at the bottom, a play button, and a volume icon. Below the video player, the title "How Lead Poisons Chicago" is visible, along with the author's name "Megan Cottrell" and a brief description: "A short flash video about how lead poisoning is affecting entire populations of kids in Chicago."

# “How Lead Poisons Chicago” - Megan Cottrell



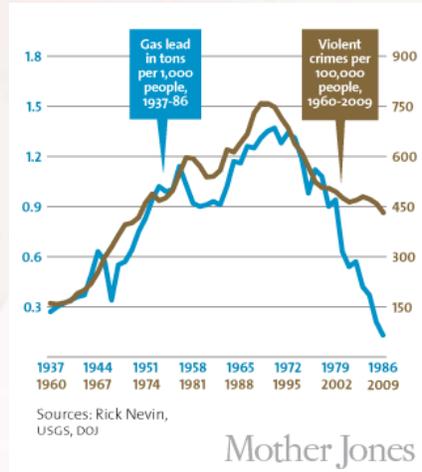
## Lead and Education



Although we cannot be certain which students' IEP services are attributable to lead exposure, we estimate that lead-related IEPs cost the state an additional **\$17 million** for the 2011-12 school year.

Source: Providence Plan, 2014

## Lead and Violence



Source: Mother Jones, 2013

## Questions?

# East Providence Lead Law Compliance Lead-Safe Work Practices

Overview	City Enforcement
Contractors, painters, and others disturbing interior or exterior paint in most pre-1978 homes, elementary schools, and child care buildings are required by law to follow federal and Rhode Island lead-safe work practice standards. The purpose of these laws is to protect workers, residents, and their families from lead dust created during work on older homes.	Beginning August 27, 2015, the City of East Providence will require all building permit applicants to prove they are trained and licensed to conduct work in compliance with Rhode Island's lead paint safety laws or that their work is exempt from these requirements. The purpose of this policy is to ensure the City does not issue permits for work that violates State law and puts workers and children at risk..

## More Details

Please see these additional documents for step-by-step explanations of the following topics:

- Hiring a licensed Lead Hazard Control Firm
  - *Planning to Renovate, Repair, or Paint?*
- Pictorial overview of lead-safe work practices
  - *EPA's Renovation, Remodeling, and Painting Rule Requires Lead-Safe Work Practices*
- How to prove compliance with State lead-safe work practices laws
  - *Working Lead-Safe in East Providence*

## Legal Authority: State Building Code

RIGL § 23-27.3-114.1(a) states in part that:

If the application or plans do not conform to the requirements of this code or of all applicable laws, the building official shall reject the application citing the specific sections of this code or applicable law upon which the rejection is based. If the building official is satisfied that the proposed work conforms to the requirements of this code and all applicable laws thereto, he or she shall issue a permit.

## Questions/Complaints?

Report suspected lead-safe work practices violations to:

- RI Department of Health: 401-222-5960
- RI Department of Environmental Management: 401-222-2808

Refer questions about contractor training and licensing to:

- RI Department of Health
  - [health.ri.gov/lead](http://health.ri.gov/lead)
  - 401-222-5960



## Lead Certificate Cheat Sheet

Tenants in Rhode Island have a right to housing without lead hazards. However, this doesn't mean that every house must be completely free of lead paint. Instead, most rental housing units built before 1978 need to have a current lead certificate proving that they meet minimum lead safety standards or higher, in accordance with the Lead Hazard Mitigation Act. Violations of this standard include chipping and peeling paint, bare soil within 5' of a house, and painted friction surfaces (wooden windows, rubbing doors, etc.).

It is important to know that most lead certificates are issued for a specific housing *unit*, not a whole house, and are valid for a set period of time – usually 1 or 2 years. The chart below provides a handy guide for determining whether a certificate is still valid, and indicates which are listed in the searchable, statewide lead certificate database available to the public online at:

<http://dualsearch.provplan.org>

The most common types of lead certificates in Rhode Island are the **Certificate of Conformance** and **Lead Safe Certificate**. However, three variants of the Certificate of Conformance (Interior Only Certificate of Conformance, Affidavit of Completion of Visual Inspection, and Certificate of Presumptive Compliance), one variant of the Lead-Safe Certificate (Certification of Lead-Safe Status With Annual Re-Inspection Exemption) and one additional certificate (Lead-Free Certificate) also exist.

Lead Certificate Type	Valid for	Regulations	In online database?
Certificate of Conformance - Independent Clearance Inspection	2 years*	RI Housing Resources Commission	Yes
Certificate of Conformance - Interior Only	A few months**	RI Housing Resources Commission	Yes
Affidavit of Completion of Visual Inspection	2 years	RI Housing Resources Commission	No
Certificate of Presumptive Compliance	1 year***	RI Housing Resources Commission	No
Lead-Safe Certificate	1 year****	RI Dept. of Health	Yes
Lead-Free Certificate	Permanent	RI Dept. of Health	Yes

*\* If there has been no change in tenants two years after a Certificate of Conformance is issued, a property owner may stay in compliance either by hiring a lead inspector to re-inspect and issue another Certificate of Conformance, or by conducting his or her own visual inspection of the rental unit and filing an Affidavit of Completion of Visual Inspection with the Housing Resources Commission. Affidavits must be notarized.*

*\*\*Interior Only Certificates of Conformance can only be issued during cold-weather months (Nov. through May) with permission from HRC. Remaining exterior hazards must be remediated and the home must be reinspected by either the following June 1<sup>st</sup> or no more than or 30 days after the certificate issue date, whichever comes later.*

*\*\*\*Under certain circumstances, the annual reinspection requirement may be permanently waived by the Department of Health. This status will be indicated in the Department of Health's online certificate database and reflected in writing on the certificate itself.*

*\*\*\*\*Under certain circumstances, a landlord who owns 10 or more dwelling units built after 1960 may apply for a Certificate of Presumptive Compliance for some of those units. Refer to the RI Housing Resources Commission's Application for Presumptive Compliance for full details.*

# WORKING LEAD-SAFE IN PROVIDENCE

Building officials have an important role to play in protecting children, workers, and the environment from lead hazards. Contractors, painters, and others disturbing interior or exterior paint in most pre-1978 homes, elementary schools, and child care buildings are required by law to follow federal and state lead-safe work practice laws. This sample chart can be used to determine whether a project requires a worker to be trained and licensed to comply with Rhode Island's lead-safe work practices laws, and provides examples of how a contractor can prove their compliance or exemption.

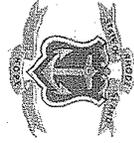
## Proof of Compliance

Lead Hazard Control Firm License

Lead-Safe Remodeler/Renovator License



Exemptions	Proof of Exemption
Property built after 1978	Tax assessor records or other official document showing year built
Non-residential property <b>other than</b> a school or licensed child care facility occupied by children under 6	Both of the following: <ul style="list-style-type: none"> <li>• Tax assessor records or other official document showing commercial use</li> <li>• Articles of incorporation or organization (available at <a href="http://sos.ri.gov/business">http://sos.ri.gov/business</a>) or other official document showing type of business(es) present at property address</li> </ul>
Children under 6 do not reside in the property for 14+ days per year, and the property type is one of the following: <ul style="list-style-type: none"> <li>• Housing reserved for the elderly or persons with disabilities</li> <li>• Non-rental housing</li> <li>• Dormitory</li> </ul>	One or both of the following, as applicable: <ul style="list-style-type: none"> <li>• Signed affidavit from property owner or legal representative</li> <li>• HUD contract or other proof that property was reserved for elderly (62+) or persons with disabilities at the time of the initial occupancy</li> </ul>
Interior work will disturb less than 6 sq ft of paint per room within a 30 day period	Signed affidavit from property owner or legal representative
Exterior work will disturb less than 20 sq ft of paint on the premises within a 30 day period	Signed affidavit from property owner or legal representative



State of Rhode Island and Providence Plantations  
DEPARTMENT OF HEALTH  
HEALTH PROFESSIONALS REGULATION  
LEAD HAZARD CONTROL FIRM LICENSE

Pursuant to the Lead Poisoning Prevention Act, Chapter 24.6 of Title 23 of the General Laws entitled "Health and Safety" as amended, and the Rules and Regulations for Lead Poisoning Prevention, and in reliance on statements and representations made by the licensee, this license is hereby issued authorizing the licensee to act as a Lead Hazard Control Firm. This license is subject to the provisions of the Act, all-applicable rules, regulations, orders and notices of the Department of Health now or hereafter in effect, and to any conditions specified below.

Licensee:

Address:

[REDACTED]

License Number:

Expiration Date:

[REDACTED]

Lead Hazard Control Designated Remodeler/Renovator Name:

Lead Hazard Control Designated Remodeler/Renovator License No.

At least one licensed Lead Hazard Remodeler/Renovator must be physically present whenever any on-site lead hazard control activity is being performed.

The photo ID issued by the RIDOH must be clearly displayed by a Lead Hazard Remodeler/Renovator at all times while supervising lead hazard control activity.

Except as specifically provided otherwise in this license, licensees shall conduct their activities in accordance with statements, procedures and representations contained in the documents, including any enclosures, listed below. The Rhode Island Rules and Regulations for Lead Poisoning Prevention shall govern unless the statements, representations and procedures in the licensee's application and correspondence are more restrictive than the regulations.

*Raquel Barrera*

Raquel Barrera  
Sr. Community Program Liaison Worker  
Healthy Homes and Environment

LJ23

> I&S Partnering with CLAP in the prevention of Lead Poisoning

### CITY OF PROVIDENCE INSPECTION AND STANDARDS CHILDHOOD LEAD ACTION PROJECT and THE PREVENTION OF LEAD POISONING

CHILDHOOD LEAD ACTION PROJECT

About Us | Training | Programs | Resources | News

**Catalyzing change**  
Over the years, the Childhood Lead Action Project has come to be recognized as a leading education and information resource by the community and as a catalyst for social change.

**21st Anniversary Benefit**  
Come help us celebrate 21 years of getting the lead out at a special benefit event on Thursday, October 10! The fun starts at 5:30 pm and runs until 8:00 in the Atrium at the Crowne Plaza Hotel in Warwick. The event will feature music, appetizers, desserts, cash bar, awards, and a silent auction. Tickets are \$50. Please call our office at 401-785-1310 to RSVP today or click here to buy tickets online. Thanks for your support!

**RRP En Espanol**

**Lead-based Training**

**Up to Code Campaigns**

**Donate**

Take Action  
Fix Your Home  
Contact Us  
Join Our Mailing List  
GO

Property owners and renters: take the Lead Hazard Awareness Seminar online today!

**Are you disturbing paint? Know the rules... Sign up for an RRP class today!**

Are you disturbing paint in a home built before 1978? Make sure you meet the EPA's new Renovation, Repair, and Painting requirements. Sign up for an RRP class today!

LJ24

> Prov-Smart App site

### CITY OF PROVIDENCE INSPECTION AND STANDARDS ProvSmart®

App zone for **PROV Smart**

Work In Progress

Apps: All Apps, New Items, Events, Reports, My Activities, My Followed Items, My Synced Items, File It

Grid of application icons:

- C/O Request
- Complaints
- ePlan Issue - Plumbing
- ePlan Issue - Zoning
- ePlan Issues - Building
- ePlan Issues - CPW
- ePlan Issues - Electrical
- ePlan Issues - Fire Alarm
- ePlan Issues - Fire Protection
- ePlan Issues - Forestry
- ePlan Issues - Mechanical
- ePlan Issues - Water
- ePlan Project Files
- Fire Plan Review - Residential
- Fire Plan Review Application - Commercial
- Fire Prevention Test Permit Application
- Inspection Requests
- Inspections - Building
- Inspections - Electrical
- Inspections - Mechanical
- Inspections - Plumbing
- Inspections - Violations
- Legacy - Building Inspections
- Legacy - Building Permit Application
- Legacy - Certificates of Occupancy
- Legacy - CO Requests
- Legacy - Electrical Inspections
- Legacy - Electrical Permit Application
- Legacy - Mechanical Inspections
- Legacy - Mechanical Permit Application
- Legacy - Payment Tracker
- Legacy - Permits
- Legacy - Plumbing Inspections
- Legacy - Plumbing Permit Application
- Legacy - Mechanical Licenses
- Notices of Violation
- Permit Address Manager
- Payment Tracker
- Permit Applications - Building
- Permit Applications - Electrical
- Permit Applications - Fire Residential
- Permit Applications - Mechanical
- Permit Applications - Plumbing
- Prosecution
- Recorded - COs
- Recorded - Permits
- Recorded - Revenue Reports
- Reference - Building Work Types
- Reference - Inspection Types
- Reference - Inspector Ward Assignments
- Reference - Permit Numbering
- Reference - Structure Users
- Test\_Collet
- Tradeperson Register
- WF FirstSA

## Slide 1

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**LJ23** With much help and guidance from CLAP The city of Providence department of Inspection and Standards was pleased and exited to be a part of preventing Lead Poisining.

Lykins, Jeff, 10/7/2013

## Slide 2

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**LJ24** We have a new Enterprise cloud base software we ar using at I&S That we have just launched the a new version that includes a coilection of Smart Apps for tracking Lead Violations and

Lykins, Jeff, 10/7/2013

**11**

CITY OF PROVIDENCE  
INSPECTION AND STANDARDS  
ProvSmart®

- Prov-Smart App site
  - Building Permit App
  - This App The Starting point where we can play a role in preventing lead poisoning.
  - We no longer issue permits for residential work with out a RRP license.

The screenshot shows a grid of application icons. A blue arrow points to the 'Permit Applications - Building' icon, which is highlighted with a blue border.

**126**

CITY OF PROVIDENCE  
INSPECTION AND STANDARDS  
ProvSmart®

- Prov-Smart App site
  - RRP License now collected on the permit.

Please fill out the following form. Highlight Fields

Applicant: Contractor		STATE OF RHODE ISLAND		<b>BUILDING PERMIT APPLICATION</b>	
MUNICIPALITY <b>PROVIDENCE</b>		NUMERICAL CODE <b>28</b>		PERMIT NO.	
APPLICATION DATE <b>10/2/13</b>		CENSUS TRACT		PERMIT FEES <b>\$41</b> BY <b>Lykins, Jeff</b>	
1. STREET LOCATION <b>1192 Westminster St</b>		2. ZONING DIST. <b>RP</b>		Overlay <input type="checkbox"/> HD <input type="checkbox"/> HD <input type="checkbox"/> WSOD	
3. PLAT <b>032</b>		4. LOT <b>314</b>		5. WARD <b>13</b>	
6. AREA <b>5,455</b>		7. REHAB CODE <input type="radio"/> YES <input checked="" type="radio"/> NO			
8. USE OF STRUCTURE: PREVIOUS <b>Mixed Use</b>		PROPOSED <b>Mixed Use</b>			
9. OWNER <b>West Broadway Neighborhood Ass</b>		ADDRESS <b>1560 Westminster St</b>		Providence RI 02909 TEL.NO.	
E-Mail					
10. CONTRACTOR <b>KENNETH F. HELTMAN</b>		<b>KENCO CONSTRUCTION</b>		False <input type="radio"/> YES <input type="radio"/> NO TEL.NO. <b>401-258-7837</b>	
11. ADDRESS <b>100 EARLY AVENUE</b>		<b>WARWICK, RI 02889</b>		LIC # <b>18654</b> EXPIR. <b>9/1/15</b>	
E-Mail					
12. ENGINEER				IN STATE <input type="radio"/> YES <input type="radio"/> NO TEL.NO.	
13. ADDRESS				REG # EXPIR.	
E-Mail					
14. ARCHITECT				IN STATE <input type="radio"/> YES <input checked="" type="radio"/> NO TEL.NO.	
15. ADDRESS				REG # EXPIR.	
E-Mail					
14. LEAD LIC. <b>KENNETH F. HELTMAN</b>		<b>KENCO CONSTRUCTION</b>		IN STATE <input type="radio"/> YES <input checked="" type="radio"/> NO TEL.NO. <b>401-258-7837</b>	
15. ADDRESS <b>100 EARLY AVENUE</b>		<b>WARWICK, RI 02889</b>		LIC # <b>LRM-3452</b> EXPIR. <b>11/30/17</b>	
E-Mail					
16. Stamped Prints		17. CO Required		19. Code	
				20. BBR	
				Property Type	
				Radon Fee	

**NOTE ALL ITEMS**

### Slide 3

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- J1** One of our apps is of course for Building Permits,  
This is starting point where we felt we could be play a part in preventing Lead Poisoning  
Jeff, 11/20/2014

### Slide 4

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- LJ26** On our new Building Permit application now includes space for collecting LRM Lic. info.  
Lykins, Jeff, 10/7/2013

**L127**

**CITY OF PROVIDENCE  
INSPECTION AND STANDARDS**

**ProvSmart®**

- > Prov-Smart App site
- > Lead-Tradesperson Register
- > As of November 2014, **182** contractors with RRP License have registered with the City of Providence.
- > As of November 2015, **599** contractors with RRP License have registered with the City of Providence.

First Name	Last Name	Phone	Company	License Number	License Expires In State	Trade Type	License Description	Email Address	Address Line 1	Address Line 2
KEITH	ALBANESE	(401)255-3119	KEITH ALBANESE	LRM-2379	04/30/2016	Lead	LEAD-SAFE REMODELER/REN		20 MOSWANSICUT DRIVE	JOHNSTON, R.I. 02919
TREVOR	ALVES	(401)288-7227	ESTATE BUILDERS AND DEVELOPMENT, INC.	LRM-2501	06/30/2016	Lead	LEAD HAZARD		195 LEONARD AVENUE	EAST PROVIDENCE, R.I. 02914
BENJAMIN	ANDREOZZI			LRM-1659	06/30/2015	Lead	RI LEAD-SAFE REMODELER/REN		60 BAY SPRING AVENUE, UNIT B 3	BARRINGTON, R.I. 02809
DANIEL J.	ANTONELLI	(401)434-2960	ANTONELLI CONSTRUCTION COMPANY	LRM-3377		Lead	LEAD RENOVATOR		66-D COMMERCIAL WAY	EAST PROVIDENCE, R.I. 02914
Ymy D.	Arias	(401)301-4158	ARIAS CONSTRUCTION	LRM-3268	07/1/2017	Lead	LEAD RENOVATOR		59 Superior Street	Providence, R.I. 02907
Raymond J.	Arsula	401-640-4369	BRAPCO INC	LHRM-0177-0171	06/30/2013	Lead	LEAD		321 Main St	Woonsocket, RI 02995
JESUS	AYALA	(401)243-5603	AYALA'S CONSTRUCTION	LRM-1100	11/30/2013	Lead	LEAD RENOVATOR		110 UNION AVENUE	PROVIDENCE, R.I. 02909
FREDERICK C.	BAILEY	(401)441-8825	FREDERICK C. BAILEY	LRM-2884	01/31/2017	Lead	LEAD SAFE RENOVATOR		6 CASTALDI DRIVE	JOHNSTON, RI 02919
MICHAEL	BARONE, JR.	(401)413-8884	MICHAEL BARONE CONSTRUCTION	LRM-3099	03/01/2018	Lead	LEAD RENOVATOR		29 ELLIOT AVENUE	NORTH PROVIDENCE, R.I. 02904
ROBERT J.	BAGNET	(401)748-5434	R. BAGNET CONSTRUCTION COMPANY, INC.	LRM-1375	04/30/2015	Lead	RI LEAD-SAFE REMODELER/REN		27 BLACK HAWK TRAIL	SMITHFIELD, R.I. 02917
ARNOLDO	BENTEZ	(401)226-3601	BENTEZ CONTRACTORS	LHRM-0126-0127	09/30/2013	Lead	LEAD CONTRACTOR		21 PUTNAM STREET	PROVIDENCE, RI 02903
ADRIENNE	BENZ	(401)338-8996	FROM IN FORM, L.L.C.	5635	10/16/2013	Lead	RI LEAD-SAFE REMODELER/REN		54 HEALTH AVENUE	PROVIDENCE, R.I. 02908
HARVEY	BLAU	(401)339-1279	L.W. BLAU & SON, INC.	LRM-1363	04/30/2015	Lead	RI LEAD-SAFE REMODELER/REN		93 UNIVERSITY AVENUE	PROVIDENCE, R.I. 02906
James P.	Bordeau	(401)831-2591	JAMES DIAMOND HOMES IMPROVEMENT, INC.	LRM-1296	02/28/2015	Lead	RI LEAD-SAFE REMODELER/REN		35 ARGONNE STREET	JOHNSTON, R.I. 02919
JOSEPH E.	BORLAND		J. BORLAND CONSTRUCTION	LRM-2080	11/30/2015	Lead	LEAD-SAFE REMODELER/REN		141 BROAD STREET	REHOBOTH, MA. 02969
DAVID W.	BOULAS	(401)523-3500	DWB CONSTRUCTION	LRM-3037	03/31/2017	Lead	LEAD RENOVATOR		149 FORBES STREET	RIVERSIDE, R.I. 02915
LAURENIO	BRAGA	(401)735-9609	LARRY BRAGA CARPENTRY	LRM-2773	10/31/2016	Lead	LEAD-SAFE REMODELER/REN		10 KENNEDY DRIVE	NORTH PROVIDENCE, R.I. 02904
DONALD	BROUILLETTE, JR.	(401)347-1331	BROUILLETTE WOODWORKING COMPANY, INC.	LRM-3231	05/30/2017	Lead	LEAD RENOVATOR		48 BARRINGTON AVENUE	BARRINGTON, R.I. 02806
MARIANO J.	BROWN	(401)780-9843	BCT CONSTRUCTION, INC.	LRM-0015	11/30/2016	Lead	LEAD-SAFE REMODELER/REN		220 LEXINGTON AVENUE	PROVIDENCE, R.I. 02907
OLENN	BLUE	(401)378-2917	MCLAUGHLIN BLUE HOUSEWRIGHTS	LRM-1830	08/31/2015	Lead	LEAD-SAFE REMODELER/REN		353 CEDAR AVENUE	EAST GREENWICH, R.I. 02816
							LEAD-SAFE		WWW.THE-HOUSEWRIGHTS.COM	

**L128**

**CITY OF PROVIDENCE  
INSPECTION AND STANDARDS**

**ProvSmart®**

- > Prov-Smart App site
- > Complaint App

The screenshot shows the 'app zone for PROV Smart' interface. It features a grid of application icons categorized into ePlan, Legacy, and Permit sections. The ePlan section includes icons for ePlan Issues (Plumbing, Electrical, Fire Alarm, Fire Protection, Forestry, Mechanical, Water), ePlan Project Files, Fire Plan Review (Residential, Commercial), and Inspections (Building, Electrical, Mechanical). The Legacy section includes Legacy - CO Requests, Legacy - Electrical Inspections, Legacy - Electrical Permit Application, Legacy - Mechanical Inspections, Legacy - Mechanical Permit Application, Legacy - Payment Tracker, Legacy - Permits, Legacy - Plumbing Inspections, Legacy - Plumbing Permit Application, Mechanical Licenses, and Permits (Applications - Building, Applications - Electrical). The Permit section includes Permit Applications (File Resubmission, Mechanical, Plumbing), Prosecution, Recorded - COs, Recorded - Permits, Recorded - Revenue Reports, Reference - Building Work Types, Reference - Inspection Types, Reference - Inspector Ward Assignments, Reference - Permit Numbering, Reference - Structure Uses, Test/Callout, and Tradesperson Register. A 'Work In Progress' dropdown menu is visible in the top right corner.

## Slide 5

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**LJ27** This information is then keep in the Lead-Tradperson Regiter Data base.  
Lykins, Jeff, 10/7/2013

## Slide 6

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**LJ28** We have four new apps for working with Lead Violations.  
Lykins, Jeff, 10/7/2013



## Slide 7

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**LJ29**    The Complaints App  
Used to register complaints.  
Lykins, Jeff, 10/7/2013

## Slide 8

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**LJ30**    The Inspections-Violations App  
Thsi App is auto populated from the complaint App  
Lykins, Jeff, 10/7/2013

**L31**

> Prov-Smart App site  
> Complaint App  
> Inspections-Violation App  
> Notice of Violation App

CITY OF PROVIDENCE  
INSPECTION AND STANDARDS  
ProvSmart®

The screenshot shows the 'app zone for PROV Smart' interface. It features a grid of application icons categorized into 'Complaints', 'Inspections - Violations', and 'Notices of Violation'. A red arrow points to the 'Notices of Violation' category. The interface includes a search bar, a 'Work In Progress' dropdown, and a sidebar with navigation options like 'All Apps', 'New Item', 'Events', 'Search', 'My Activities', 'My Followed Items', 'My Special Items', and 'File It'.

**L33**

> Notice of Violation and Correction Order

CITY OF PROVIDENCE  
INSPECTION AND STANDARDS  
ProvSmart®

Department of Inspection and Standards  
Alford T. Ryan, Mayor  
Jeffrey L. Lykan, RA, Director

**NOTICE OF VIOLATION AND CORRECTION ORDER**

To: Joe Leadman  
Leadville, USA

Property:  
Plat: Lot:  
Inspector:  
Inspection Date:  
Issue Date:  
Certified Mail #:

Upon inspection of your property, the following violation(s) of the State Property Maintenance Code (SPMC) and/or the Lead Hazard Mitigation Act (LHMA) were found and you are hereby ordered to bring your property into compliance with the provisions of the Code and/or Act by the date(s) indicated below.

Some repair work may require a permit. Please check with the appropriate division within the Department of Inspection & Standards as to the requirements regarding the type of work you are going to undertake.

All interior and exterior paint removal must be done in accordance with the regulations of the State Health Department. Additionally, owners of rental dwellings built before 1978 must comply with the Lead Hazard Mitigation Act (R.I.G.L. Section 42-128.1) as well as the Housing Resource Commission Rules and Regulations. The requirements for lead hazard mitigation apply to the first change in ownership or tenancy after November 1, 2005. Owners must provide DHS with a copy of their Certificate of Conformance (Compliance) issued by the Department of Health as well as any Affidavits of Completion of Visual Inspection. To obtain more information concerning the Lead Hazard Mitigation Law, visit [www.hrs.rhode.gov](http://www.hrs.rhode.gov).

When you have corrected the violations, please call the inspector so that the inspector may verify that the work has been completed.

If you fail to comply with this notice of violation within 30 days of the issue date indicated above, a second notice of violation will be issued and a cumulative civil penalty of fifty dollars (\$50.00) per day per violation for each day each violation remains outstanding. The second notice and the penalty imposed will be recorded as a lien on your property. The notice and lien will not be released until the violations have been abated and the penalty imposed has been paid.

You have the right to appeal this Notice of Violation and Correction Order. This appeal must be in writing and received within ten (10) days. See State Property Maintenance Code, Section 111. If you believe there are extenuating

444 Westminster Street | Providence, Rhode Island 02903 | 401-680-5201 | 401-680-5482 Fax

The screenshot shows a document titled 'NOTICE OF VIOLATION AND CORRECTION ORDER' overlaid on the ProvSmart app interface. The document is addressed to Joe Leadman in Leadville, USA. It details the findings of an inspection, the required repairs, and the consequences of non-compliance, including a cumulative civil penalty of \$50.00 per day per violation. The document also provides information on how to appeal the order and contact details for the Department of Inspection and Standards.

## Slide 9

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- LJ31** The Notice of Violation App  
This App is autopopulated from the Inspection-Violations App  
Lykins, Jeff, 10/7/2013

## Slide 10

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- LJ33** If a complaint and Inspection result in a violation then the Violation App will generate a NOV.  
Lykins, Jeff, 10/7/2013

**L34**

> Notice of Violation and Correction Order  
 > Lead Hazard Mitigation Act  
 > Requires a COC and  
 > Instructs the owner on their responsibilities for Lead mitigation.

CITY OF PROVIDENCE  
 INSPECTION AND STANDARDS  
**ProvSmart®**

Department of Inspection and Standards  
 Jeffrey L. Lykka, RA, Director

**NOTICE OF VIOLATION AND CORRECTION ORDER**

To: Joe Leadman  
 Leadville, USA

Property:  
 Plat: Lot:  
 Inspector:  
 Inspection Date:  
 Issue Date:  
 Certified Mail #:

Upon inspection of your property, the following violation(s) of the State Property Maintenance Code (SPMC) and/or the Lead Hazard Mitigation Act (LHMA) have been observed and you are hereby notified that the property owner must take the following corrective actions:

All interior and exterior paint removal must be done in accordance with the regulations of the State Health Department. Additionally, owners of rental dwellings built before 1978 must comply with the Lead Hazard Mitigation Act (R.I.G.L. Section 42-128.1) as well as the Housing Resource Commission Rules and Regulations. The requirements for lead hazard mitigation apply to the first change in ownership or tenancy after November 1, 2005. Owners must provide DIS with a copy of their Certificate of Conformance (Compliance) issued by the Department of Health as well as any Affidavits of Completion of Visual Inspection. To obtain more information concerning the Lead Hazard Mitigation Law, visit [www.hrc.ri.gov](http://www.hrc.ri.gov)

If you fail to comply with this notice of violation within 30 days of the issue date, indicated above, a second notice of violation will be issued and a cumulative civil penalty of fifty dollars (\$50.00) per day per violation for each day each violation remains outstanding. The second notice and the penalty imposed will be recorded as a lien on your property. The notice and lien will not be released until the violations have been abated and the penalty imposed has been paid.

You have the right to appeal this Notice of Violation and Correction Order. This appeal must be in writing and received within **ten (10) days**. See State Property Maintenance Code, Section 211. If you believe there are extenuating circumstances, you may request a hearing. The hearing must be held within 30 days of the date that the notice of violation has been completed.

444 Westminster Street | Providence, Rhode Island 02903 | 401-680-5201 | 401-680-5482 Fax

**L32**

> Notice of Violation App  
 > Prosecution App:  
 > If we do not receive a COC, then our Prosecution department prepares a case for Lead Court.

CITY OF PROVIDENCE  
 INSPECTION AND STANDARDS  
**ProvSmart®**

The screenshot shows the 'app zone for PROV Smart' interface. It includes a sidebar with navigation options like 'All Apps', 'Dashboard', 'Map', and 'Portfolio'. The main area displays a grid of application icons categorized into 'Complaints', 'Inspections - Violations', 'Notices of Violation', and 'Prosecution'. A red arrow points to the 'Prosecution' icon, which is a scale of justice.

## Slide 11

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**LJ34** All our NOV's include language instructing the owner in their responsibilities with respect to the Lead Hazard Mitigation Act.

Lykins, Jeff, 10/7/2013

## Slide 12

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**LJ32** And the Procution App.  
This App combines all the data fro the other apps to prepare the court case.

Lykins, Jeff, 10/7/2013

CITY OF PROVIDENCE  
INSPECTION AND STANDARDS

LEAD ABATEMENT

- The City of Providence and the Department of Inspection & Standards has taken a pro-active approach to the challenge of lead poisoning prevention.
- Inspection & Standards requires a lead license in addition to a Contractors registration to obtain a permit for residential property.
- Partnering with CLAP, CLAP provides continuing education to our staff on the facts of lead poisoning.
- Partnering with the Solicitor Office we have created a Lead court to try housing cases with lead violations.
- Inspection & Standards has received:
  - The Beyond the Call of Duty Award
  - A Citation from the Mayor
  - A Citation from the City Council
  - Over 24% drop in Lead poisoning

“We just finished running a lead screening report for 2013. We saw another significant drop in lead levels. Providence was a star. For incidence of leads above 5, over 100 fewer kids were poisoned and the number of kids screened went up in Providence!

2012: 530 of 6361 kids tested  
2013: 402 of 6404 kids tested”

*Providence Health Department*

CITY OF PROVIDENCE  
INSPECTION AND STANDARDS

LEAD ABATEMENT

- Contractors with RRP License registered with the City:
  - 184 RRP registered Contractors
- Permits taken out with RRP License/Contractor

2011: 284  
2012: 675  
2013: 704  
2014: 700 to date



CITY OF PROVIDENCE  
INSPECTION AND STANDARDS

**LEAD ABATEMENT**

**Court Cases with Lead Violations:**

- 2011: 0
- 2012:
  - 153 Cases filed
  - 126 Cases Abated
- 2013:
  - 170 Cases filed
  - 125 Cases Abated
- 2014:
  - 150 Cases filed
  - 60 Cases Abated
- 2015:
  - 64 Cases filed
  - 173 Cases Abated

CITY OF PROVIDENCE  
INSPECTION AND STANDARDS

**LEAD ABATEMENT**

**The City of Providence is partnering with:**

**CLAP**

**Providence City Solicitor**

**Providence Housing Court**

**RI Department of Health**

**and soon adding Providence Planning Department.**

# CONNECTICUT DPH EDUCATION/OUTREACH AT THE LOCAL AND MUNICIPAL LEVELS

NELCC Conference  
Portsmouth, NH  
Nov 5<sup>th</sup>, 2015

1

## CT DPH PAST INITIATIVES

- **Keep It Clean Program**
  - Brochures to local health department (LHD) contacts
  - Target do-it-yourselfers through hardware stores
- **406b PRE/Lead poisoning education/outreach**
  - LHD education/outreach
  - Half day course with Asbestos Program and Department of Environmental Protection - Environmental Hazards
  - Formal training to “build awareness”
  - 180 building and fire officials



2

## CT DPH PAST INITIATIVES

- Don't Spread Lead Campaigns
  - LHDs and building officials
  - Provide educational/outreach materials
    - DSL brochures/CD's
    - "Protect Your Family"
  - Hand out to contractors, homeowners, do-it-yourselfers
  - Hardware and paint retailers



3

## RRP AND BUILDING OFFICIALS

- DPH Requested that Building Officials get more involved.....
- Permits issued from building inspectors office/point of contact
- Interface with contractor, homeowners, do-it-yourselfers



4

## RRP/EDUCATE CODE ENFORCEMENT OFFICIALS

- RRP Awareness seminars
  - Local health departments
  - Building departments
  - Fire Marshals
  - Housing code officials
  - Other state agency personnel
    - Department of Energy and Environmental Protection
    - Department of Housing
    - Department of Consumer Protection



5

## HOW ELSE?

- Distributed letter with attachments to Directors of Health and Building Officials
  - Health and building department collaboration to prevent lead poisoning
  - Explanation of RRP
  - Facts, charts, maps on CT lead poisoning
  - “RRP Intake” form as part of permitting process
  - “Feedback” form to confirm support (or not)
  - Implies building official not responsible for contractor compliance
  - Recommend denying permit if not compliant



6

**STATE OF CONNECTICUT**  
DEPARTMENT OF PUBLIC HEALTH

Jewel Mullen, M.D., M.P.H., M.P.A.  
Commissioner



Dannel P. Malloy  
Governor  
Nancy Wyman  
Lt. Governor

**Circular Letter EHS #2014-15**

DATE: April 1, 2014

TO: Directors of Health  
Chief Sanitarians

FROM: Francesca Provenzano, MPH, CHES, REHS  
Epidemiologist 4

RE: Collaborating with local building officials to prevent childhood lead poisoning during the renovation, repair and painting (RRP) of pre-1978 homes

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The Connecticut Department of Public Health (CT DPH), Lead and Healthy Homes Program (L&HHP) is requesting that directors of health collaborate with local building officials to prevent childhood lead poisoning. Specifically, we would like to have building officials utilize the attached *RRP Intake Form for Permits* at the time of issuing a permit for all pre-1978 residential properties in your municipality.

This request is being made as part of an ongoing statewide effort to ensure that contractors are in compliance with the US Environmental Protection Agency's (EPA) Renovation, Repair and Painting Rule (RRP Rule). The intention of the federal law is to prevent needless childhood and adult lead poisoning, and to prevent environmental contamination of a property's interior and exterior locations (which may expose residents to lead hazards upon occupancy). Lead-safe work carried out by contractors in all pre-1978 residential properties directly contributes to preventing childhood lead poisoning in Connecticut.

Most renovations performed on pre-1978 residential properties are subject to the EPA's RRP Rule - a federal law requiring training, certification and lead-safe work practices on older properties during renovation activities. Issuing a local renovation permit that enables work on residential properties to be carried out in direct violation of that federal law is not advisable. The CT DPH and EPA strongly recommend that a permit be denied for companies and individuals who do not hold the appropriate credentials as required under the RRP Rule.

Contractors performing renovation work on pre-1978 properties should fill out the attached *RRP Intake Form for Permits* at the time a permit is being requested. The information collected on the form will enable the CT DPH or local health department the opportunity to review and verify the contractor's RRP credentials and work practices. The CT DPH can also provide assistance and answer any questions posed by contractors or building officials.



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**RRP Intake Form for Permits**  
**For Pre-1978 Residential Projects**



Town: \_\_\_\_\_

Permit #: \_\_\_\_\_

**What is RRP?**

RRP is the Federal EPA's Renovation, Repair, and Paint Program. This law requires contractors that disturb-painted surfaces in homes, child care facilities, and schools built before 1978 to be certified by EPA and follow specific work practices to prevent lead contamination. Individuals employed by the firm must be trained and certified. The contractor must give property owners and residents a copy of "Renovate Right", a pamphlet describing the lead-poisoning risks that may come from renovating activity in homes built before 1978. The following information is necessary to assist EPA Region 1 and the State of CT in its efforts to eliminate lead poisoning in children and adults. This checklist is not applicable for Lead Abatement or homeowner "Do-It-Yourself" projects. The contractor must provide the following information prior to obtaining a local construction or renovation permit:

Business name: \_\_\_\_\_

Business address: \_\_\_\_\_

CT HIC #: \_\_\_\_\_

EPA RRP Lead-Safe Certified Firm #: \_\_\_\_\_

EPA RRP Renovator training certificate #(s): \_\_\_\_\_

Property address: \_\_\_\_\_

By signing below, I state that I will provide a copy of the EPA *Renovate Right*, lead-hazard pamphlet to the owner(s) and residents of the property before the work begins. I further agree to follow all lead-safe work practices to protect residents and workers from lead exposure.

Contractor name (print): \_\_\_\_\_

Contractor's signature: \_\_\_\_\_ Date: \_\_\_\_\_

Building Official: \_\_\_\_\_

Fax copies to CT DPH at: (860) 509-7295  
or provide hard copy to  
Director of Health for processing



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### Preventing Lead Poisoning from Renovation & Remodeling Activities

*Feedback Form on Efforts to Include RRP Form during Permit Approvals*

The Director of Health should complete this form after meeting with his or her local building official. Your feedback is needed, so that the CT DPH can understand and address identified barriers to implementing this proposal.

- Does your local building official's office support implementation of the RRP Intake Form?
  - Yes, the building official is supportive of this effort
  - No. (If no, then please explain reason for lack of support below.)
- Date of meeting with building official(s): \_\_\_\_\_
- People in attendance:
 

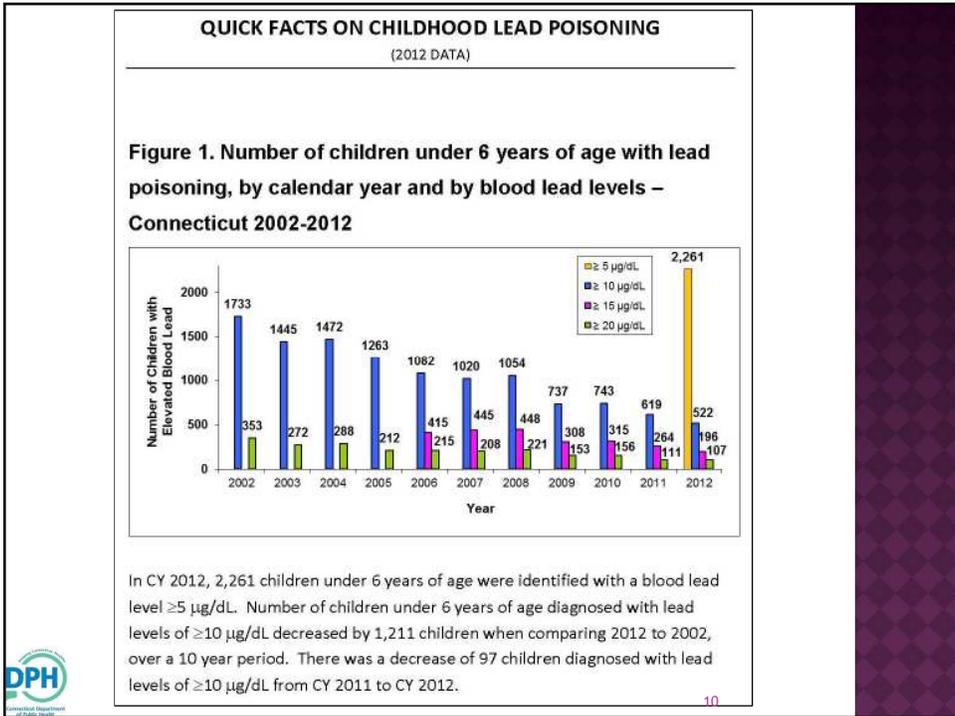
(Name)	(Title)	(tel # or email)
- Outcomes of Meeting:
  - Yes, we will use this RRP Intake Form for per-1978 residential projects where permits are required
  - No, we cannot use this form. (If no, please explain below.)

Barriers or boundaries to successful implementation (please be specific and detailed):

\_\_\_\_\_

\_\_\_\_\_


9



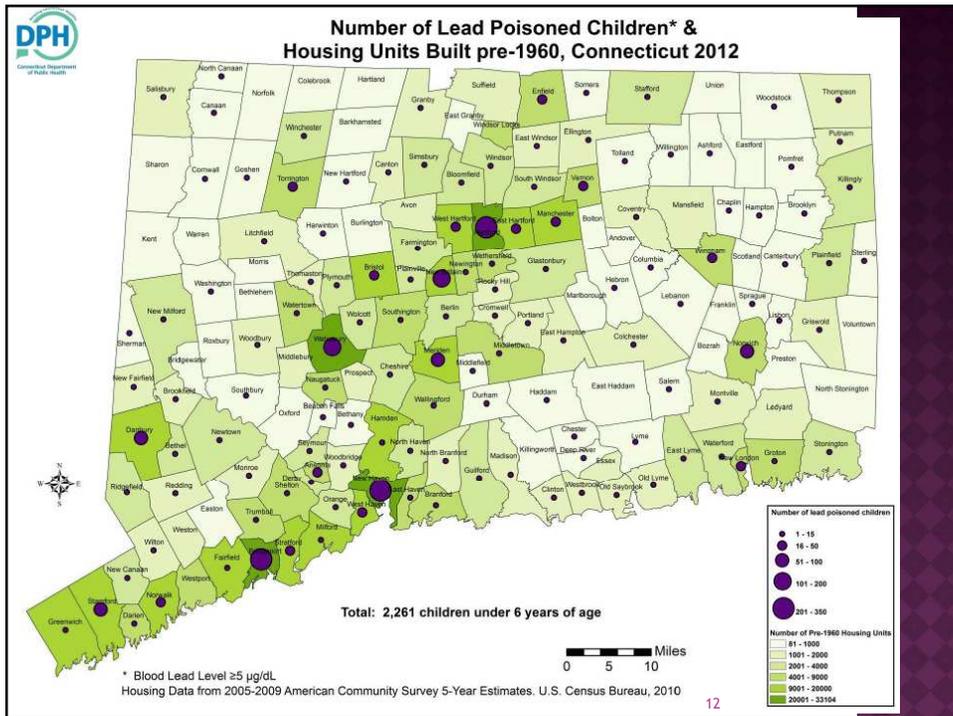
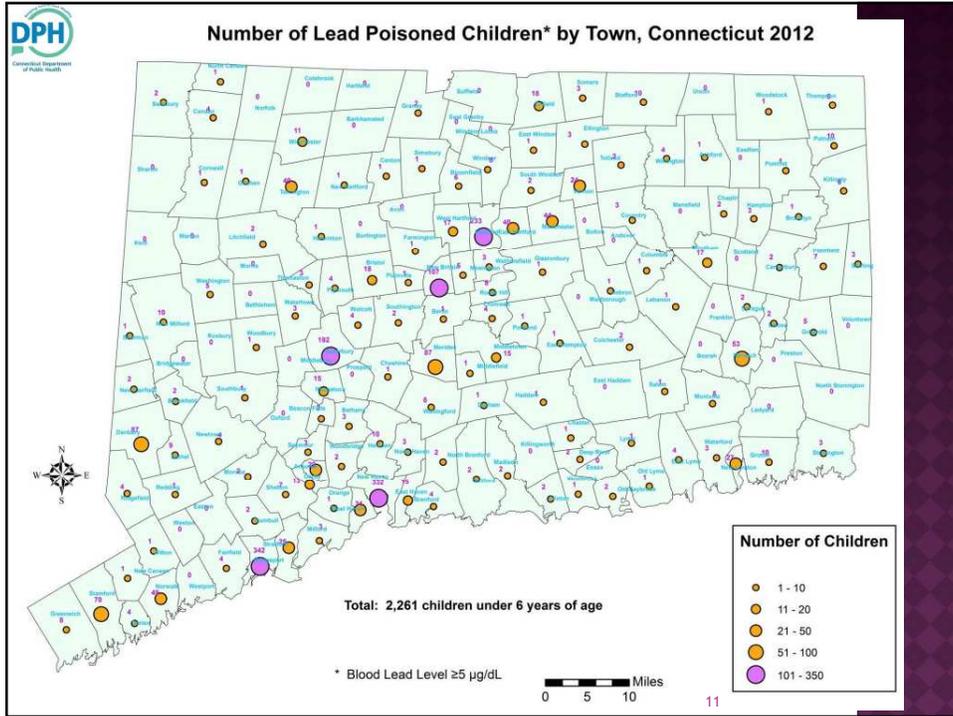


Figure 2. Percentage of environmental lead hazards identified by source

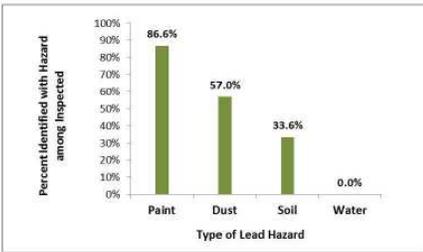
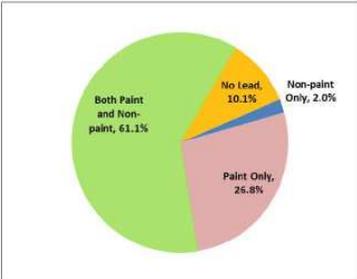


Figure 3. Percentage of environmental lead hazards related to paint or non-paint hazards



# RESULTS

- ◉ State building inspector’s office
  - Letter to local building officials to refer to local health department regarding intake form
- ◉ Slow response on submittal of feedback forms 
- ◉ Increase in 2015:
  - 57 responses
  - 29 supportive/28 non-supportive
  - 25 use intake form



## RESPONSES/BARRIERS

- ◉ Don't have the time
- ◉ \$\$
- ◉ Understaffed, part time building inspector
- ◉ Not required by building code



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## RESPONSES/BARRIERS

- ◉ State building inspector's letter
- ◉ Don't have lead poisoning problem
- ◉ Lead no longer a problem (no lead in solder or paint)
- ◉ DEEP already enforcing



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## RESPONSES/BARRIERS

- ◉ Not enforceable
- ◉ Potential liability for denial of permits
- ◉ EPA Rules should be enforced by EPA or DPH Lead Program
- ◉ Not willing to modify permitting process



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## GREENWICH HEALTH DEPARTMENT

- ◉ Modified RRP intake form
- ◉ LHD and BD collaborate: sign off process
- ◉ Require RRP cert. for plans and permit app.
- ◉ Several glitches:
  - Certification
  - Property owners
    - ◉ Modified form for sign off
    - ◉ “Protect Your Family” booklet given



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**CONNECTION COLLEGIATE PROGRAM**  
Department of Health

**DEPARTMENT OF HEALTH**  
**RRP Instate Form for Building Permits**  
**For Pre-1978 Residential Projects**

**What is RRP?**

RRP is the Federal EPA's Renovation, Repair, and Painting Program. This law requires contractors that disturb painted surfaces in homes, child care facilities, and schools built before 1978 to be certified by EPA and follow specific work practices to prevent lead contamination. Individuals employed by the firm must be trained and certified. The contractor must give property owners and residents a copy of "Renovate Right", a pamphlet describing the lead poisoning risks that may come from renovation activity in homes built before 1978. The following information is necessary to assist EPA Region 1 and the State of CT in its efforts to eliminate lead poisoning in children and adults. The contractor must provide the following information prior to obtaining a local construction or renovation permit:

Business name: \_\_\_\_\_  
 Business address: \_\_\_\_\_ CT HIC #: \_\_\_\_\_  
 EPA RRP Lead-Safe Certified Firm # (optional): \_\_\_\_\_  
 EPA RRP Renovator training certificate #(s): \_\_\_\_\_  
 Property Owner: \_\_\_\_\_  
 Property Address: \_\_\_\_\_ Parcel ID #: \_\_\_\_\_  
 Scope of work: \_\_\_\_\_

By signing below, I state that I will provide a copy of the EPA *Renovate Right* lead-based pamphlet to the owner(s) and residents of the property before the work begins. I further agree to follow all lead-safe work practices to protect residents and workers from lead exposure.

Contractor name (print): \_\_\_\_\_ Date: \_\_\_\_\_  
 Contractor's Signature: \_\_\_\_\_ Date: \_\_\_\_\_

**Homeowner Performing the Work** - By signing below I state that I have received a copy of the EPA pamphlet *Protect Your Family from Lead in Your Home*, there is potential for lead contamination of the home during the course of the project and acknowledge that children under six (6) years of age are most at risk for lead poisoning.

Property Owner: \_\_\_\_\_ Signature: \_\_\_\_\_ Date: \_\_\_\_\_

Health Department Official: \_\_\_\_\_ Date: \_\_\_\_\_  
Rev 4/2015

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**CT 90**

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## NOT A DONE DEAL....

- LHD's receive \$\$ for lead poisoning prevention activities
- CT DPH:
  - promote collaboration between LHD/building officials on implementing RRP permitting process
  - provide lead poisoning prevention education/outreach materials
  - continue to build RRP awareness and compliance

## AND COMING SOON.....

- ◉ Don't Spread Lead 2015
- ◉ Video filming completed in October
  - Use as an educational tool
  - Combines lead safe work practices with RRP awareness
  - Target audiences
    - ◉ Do-it-yourselfers
    - ◉ Public health officials
    - ◉ Building officials
  - Available January
    - ◉ CT DPH Web site
    - ◉ YouTube
    - ◉ NELCC

