

Michael F. Easley, Governor
Sherri Evans-Stanton, Acting Secretary



January 10, 2001

MEMORANDUM

TO: Dennis Salmen, Program Chief
Mecklenburg County Health Department

FROM: Alan Huneycutt, Environmental Specialist
Children's Environmental Health Branch

THROUGH: Ed Norman, Program Supervisor
Children's Environmental Health Branch

SUBJECT: Lead-Based Paint Preventive Maintenance Program

This memo is in response to your letter dated November 9, 2000, in which you asked for an interpretation of two regulatory issues regarding: composite *vs.* individual dust wipe sampling and granting variances from otherwise required maintenance standard activities.

The use of either individual or composite dust sampling is supported in residential housing that is proposed to be enrolled in the Preventive Maintenance Program. Although 15A NCAC 18A .3108(c)(4) indicates that composite dust sampling is the prescribed sampling protocol, this approach was adopted as a cost savings procedure where samples could be combined for analysis. In fact, individual dust wipe samples provide a more accurate assessment of risk from lead-contaminated dust; however, additional samples are required to assess the same number of surfaces. A minimum of four individual dust wipe samples are needed, two each from floors and either interior window sills or window troughs. Sampling should include a bedroom, a playroom, a den, and a kitchen. There is no minimum number of residential housing units for which this exception would be triggered. As a matter of policy, individual dust sampling is acceptable in all cases although composite sampling is also allowed under state law.

Applicants for the Preventive Maintenance Program requesting a variance from requirements under 15A NCAC 18A .3107 (e.g., capping window troughs, making floors smooth and cleanable) must be determined on a case-by-case basis. If it is determined that no lead-based paint hazard exists for a particular component (e.g., a window, a floor), then exceptions may be considered. Please call me at (704) 895-2737 or Ed Norman at (919) 715-3293 if you have any further questions.