

EPA Public Comment

Reconsideration of the Dust-Lead Hazard Standards and Dust-Lead Post-Abatement Clearance Levels

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My name is Andrew McLellan, and I'm president and training director for Environmental Education Associates, an EPA accredited LBP & RRP trainer located in Manhattan, Buffalo & Utica New York.

Our organization applauds EPA's efforts to create truly lead safe housing and encourages local and State agencies in New York to embrace this effort and take on their responsibility to implement the means to foster lead safe housing and child occupied facilities in our communities. I talked to a father today in Hamburg, NY whose daughter was diagnosed with a BLL of 5 ug/dl who was living in a dwelling where dust testing indicated lead dust concentrations below or slightly above the current DLHS & DLCL. He didn't care about the difference between what was present versus elevated, he was only concerned that his child was exposed to lead dust.

EEA trains thousands of individuals in lead abatement, inspection, risk assessment and lead safe renovation every year. Among the challenges we face educating our course attendees is the difficulty of using outdated EPA issued training curriculum and outdated HUD Guidance. I encourage EPA and HUD, in conjunction with NLLAP, to provide updated training course materials, including PowerPoint presentations, course manual sections and video. The EPA-issued course curriculum we are approved to use for LBP activities dates to 2000, and RRP to 2021 although those were admittedly minor. This is especially frustrating for prospective lead inspectors and risk assessors who must pass a third-party test who may be confused by the myriad of conflicting values in the training course materials, notes and handouts we provide to help clarify the differences.

I would also encourage EPA to consider a LBP certification application mechanism whereby trainers and others who submit individual applications could apply on behalf of the applicant. Many of those who attend abatement training in particular, do not have the means, capability or desire to apply electronically.

I look forward to learning more about EPA's efforts to implement these proposed revisions so that we can begin to advise those who attend our initial and refresher training a clear and concise description of these new DLHS & DLCL standards and other provisions.

Thanks