



# Ohio Healthy Homes Network

## **ACTION ALERT: PLEASE SUBMIT COMMENTS TO PROTECT KIDS FROM LEAD!**

The Ohio Department of Health (ODH) [Lead-Safe Rental Registry Rules](http://www.odh.ohio.gov/en/rules/drafts/3701-81) are out for comment at: <http://www.odh.ohio.gov/en/rules/drafts/3701-81> Comments are due NO LATER than June 22, 2018 (see below for submission details).

**The CRITICAL PROBLEM:** Lead contamination is mostly invisible, yet the proposed rules do not require that at-risk properties actually be tested for lead and instead allows for a basic visual inspection. The top priority is for children to be protected from lead in their home but this Lead-Safe Rental Registry would fail to protect children by misleading the public to believe the properties on the registry have all been properly tested for lead hazards when they haven't. We test the water that comes into our home for poisonous lead so why wouldn't we expect the same for the surfaces we touch or the air we breathe as well?

**The IMPACT:** As parents and caretakers strive to find "lead-safe" housing for their young children, the registry as proposed, would not only be inadequate, but would create a false sense of security about a property being "lead-safe". Properties that are not "lead-safe" could be listed on the Lead-Safe Rental Registry and families with children renting these properties could unknowingly be exposing their children to lead-based paint hazards.

**The ASK:** Change the rule to REQUIRE LEAD DUST WIPE SAMPLING<sup>1</sup> as part of any lead inspection for purposes of inclusion of any rental unit in the Ohio Lead-Safe Rental Registry.

*Sample comment: As a (e.g. parent, pediatrician, day care provider, teacher or institution...) concerned about protecting children from exposure to lead-based paint, I'm writing to request that the Ohio Department of Health revise its proposed rules for the Lead-Safe Rental Registry to require lead dust wipe testing and not to permit the cleaning verification process or any other method that primarily relies on a visual inspection for purposes of "Post-Maintenance Dust Sampling (OAC 3701-81 (G Definitions)). Of course, this change should not be limited to the "Definitions" but should be incorporated throughout the proposed rules. Thank you for the opportunity to comment on the proposed rules.*

Submit comments through this link by midnight on June 22:

<http://business.ohio.gov/reform/enotify/comment.aspx?rulenum=3701-81-Lead-Safe%20Rental%20Registry&notificationID=22567>

**Any questions about the rules?** Contact John Belt, MS, Ohio Department of Health at 614-728-9454.

**TO LEARN MORE** about the dangers of lead exposure to children and ways to get involved or if you have more specific questions about the proposed rules, contact Patricia Barnes, Ohio Healthy Homes Network, at 614- 289-8812.

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<sup>1</sup> A clearance examination, rather than a cleaning verification, should be required for a unit's inclusion on the Lead Safe Rental Registry. The clearance examination requires lead dust wipe sampling, a technique that collects lead dust using wet wipes that are sent to a lab for analysis. The cleaning verification process does not involve sampling and laboratory analysis of the dust, but instead relies on a visual assessment. For more information, see EPA's Lead Dust Sampling Technician's Field Guide at <https://www.epa.gov/sites/production/files/documents/ldstguide.pdf>.