



7469 Whitepine Road, North Chesterfield, VA 23237  
800-347-4010  
www.leadlab.com

## Important Update on EPA Lead Dust Standards and New Reporting Limits

February 04, 2025

Dear Valued Client,

As many of you are aware, on January 13, 2025, the EPA implemented changes to the Dust-Lead Action Levels & Dust-Lead Reporting Levels which will impact both fieldwork and laboratory analysis. Please keep in mind, the date for federal compliance is set for January 12, 2026. However, an additional year has been given to the 41 states where EPA has delegated authority to implement the program. This means all states except AK, AZ, FL, ID, MT, NV, NM, NY, SC, SD, and WY have until January 11, 2027, to update their rules.

### Dust-lead action levels (previously referred to as the dust-lead clearance levels)

This update requires dust -lead action levels on floor wipes to meet a more stringent threshold of 5 micrograms per square foot ( $\mu\text{g}/\text{ft}^2$ ). Additionally, the standard for windowsill dust has been revised to  $40 \mu\text{g}/\text{ft}^2$  and the standard for window well dust has been revised to  $100 \mu\text{g}/\text{ft}^2$ .

### EPA's dust-lead reportable levels (previously referred to as the dust-lead hazard standards)

In the context of the final rule, "greater than zero" refers to the new dust-lead reportable level (DLRL) set by the EPA. The DLRL is defined as "any reportable level" of dust-lead as analyzed by an NLLAP-recognized laboratory. This means any lead dust wipe with lead concentration results greater than the laboratory's reporting limit, is considered a dust-lead hazard.

### Lab Reporting Limit Adjustments

To ensure a baseline level of consistency across laboratories, EPA has set minimum standards that laboratories must meet. As outlined in the Laboratory Quality Standards for Recognition (LQSR) version 4.0, these standards require that the reporting limit must be equal to or less than 80% of the lowest action level for dust wipe samples per specific surface area (e.g., floors, windowsills, and troughs).

In response to these new standards, our laboratory will be adjusting our reporting limits to  $4 \mu\text{g}$  per wipe.\* We anticipate this adjustment to take place by February 17, 2025.

### Sampling Requirements to Meet Clearance Standard

Clients who submit samples to EHS Laboratories can continue using a wipe area of  $1 \text{ft}^2$  to meet the new clearance level of  $5 \mu\text{g}/\text{ft}^2$  for floor dust wipe samples. For windowsills, the sample wipe area must be at least  $0.125 \text{ft}^2$  ( $18 \text{in}^2$ ).

Our team is available to assist with any questions you may have about sampling requirements or to help develop a sampling plan tailored to your needs.

We appreciate your attention to these important changes and thank you for your continued partnership. Please don't hesitate to reach out with questions or to discuss your upcoming projects. Our goal is to ensure a smooth transition to the new standards, and we are here to support you every step of the way.

\* If you use readily dissolvable wipes, such as Ghost or Invisi-Wipes, our reporting limit will be  $8 \mu\text{g}$  per wipe. To meet the new clearance levels, clients will need to submit at least  $2 \text{ft}^2$  for floors and  $0.25 \text{ft}^2$  for windowsills.

# EPA Revised Lead-Based Paint Testing Values

EPA Regulation 40 CFR Part 745

# leha

Lead and Environmental Hazards Association

## Fact Sheet

### Dust-lead Action Levels

(wipe samples, previously known as clearance levels)

#### BEFORE January 12, 2026

- Floors:  $\geq 10 \mu\text{g}/\text{ft}^2$
- Interior Window Sills:  $\geq 100 \mu\text{g}/\text{ft}^2$
- Window Troughs:  $\geq 400 \mu\text{g}/\text{ft}^2$

#### AS OF January 12, 2026

- Floors:  $\geq 5 \mu\text{g}/\text{ft}^2$
- Interior window sills:  $\geq 40 \mu\text{g}/\text{ft}^2$
- Window troughs:  $\geq 100 \mu\text{g}/\text{ft}^2$

### Dust-lead Hazard Levels

(wipe samples)

#### BEFORE January 12, 2026

- Floors:  $\geq 10 \mu\text{g}/\text{ft}^2$
- Interior Window Sills:  $\geq 100 \mu\text{g}/\text{ft}^2$

#### AS OF January 12, 2026<sup>1</sup>

- **Any reportable level** of lead for floors or for interior window sills based on wipe samples analyzed by an NLLAP-recognized laboratory.<sup>2</sup>

**Additionally...as of January 12, 2026:** "...when post-abatement dust-lead testing results are below the dust-lead action levels and at or above the dust-lead reportable levels, a dust-lead hazard statement with the following language must be in final reports to clients according to [§745.227\(e\)\(10\)\(vii\)](#).

Although the completed abatement project achieved dust-lead below action levels, some dust-lead hazards remain because any reportable level of dust-lead is considered a dust-lead hazard by the U.S. Environmental Protection Agency in a residential dwelling or child-occupied facility. In order for abatement work to be considered complete under EPA regulations, dust-lead levels must be below the action levels, which are established based on reliability, effectiveness and safety. To continue to reduce lead exposure from dust, the EPA pamphlet entitled *Protect Your Family From Lead in Your Home* includes recommendations such as: using a vacuum with a high-efficiency particulate air (HEPA) filter on furniture and other items returned to the work area, and regularly cleaning hard surfaces with a damp cloth or sponge and a general all-purpose cleaner. For more information on how to continue to reduce lead exposure, see *Protect Your Family From Lead in Your Home*.

Be aware that EPA may further clarify these issues or amend this requirement. Be sure to check the regulations for any changes that may occur.

LEHA EPA Revised Testing Values fact sheet V 1.5

LEHA WEBSITE: <https://leha.us/>

### § 745.63 Definitions: Wipe Sample.

Wipe sample means a sample collected by wiping a representative surface of known area, as determined by ASTM E1728/E1728M-20 (incorporated by reference, see § 745.67), or equivalent method, with an acceptable wipe material as defined in ASTM E1792-20 (incorporated by reference, see § 745.67). See [link](#) below for the rule with the preamble for more information

### § 745.103 Definitions: Target Housing

The definition of target housing defines which housing is subject to EPA's lead-based paint rules (both for lead-based paint activities and the renovation, repair, and painting (RRP) programs), note those words crossed out. This occurred as part of rulemaking in 2017 and included in these rules.

*Term "target housing" means any housing constructed prior to 1978, except housing for the elderly or persons with disabilities or any 0-bedroom dwelling (unless any child who is less than 6 years of age resides or is expected to reside in such housing). ~~for the elderly or persons with disabilities) or any 0-bedroom dwelling.~~*

### § 745.223: Definitions: Child-occupied Facility (COF)

*Finalized revisions to the definition of COF in 40 CFR 745.223 and related regulatory language in 40 CFR 745.227 to children "under 6 years of age."*

In this, all parts of EPA LBP rules now stipulate "under 6 years of age" for COF work.

**Comment #1:** The dates are for federal compliance. The 41 states (all but AK, AZ, FL, ID, MT, NV, NM, NY, SC, SD, and WY) where EPA has delegated authority to implement the program have an additional year—until January 11, 2027—to update their rules. Compliance in those 41 states is based on when the state updates its rules. Additionally, clients may want to know the revised hazard and new action levels prior to the federal or state/local programs compliance date. Be sure to always read the specified contract language that may address these issues. It's up to the user to keep up with these developments at the state/local level as well as any other issues that may be addressed by the EPA.

**Comment #2:** This value is determined by each NLLAP-accredited laboratory based on EPA's Laboratory Quality Standards for Recognition (LQSR, rev. 4.0) and internal determinations based on the area wiped, the laboratory method used, and instrument performance. Reportable levels must be no more than 80% of the action levels. They can vary between laboratories. Consult with the lab director of your chosen NLLAP-accredited laboratory for their guidance here. A detailed discussion of these issues is found in the preamble of the FR notice for the final rule changes. See the link below.

**Comment #3:** For federally funded housing regulated by HUD's Lead Safe Housing Rules (LSHR), the EPA values for risk and clearance have been cross-referenced to EPA values. HUD is going through their own process of rulemaking to incorporate these revised/new EPA values. If you service federally funded housing that is regulated by the LSHR, you will need to keep abreast as to when these values are applicable to that regulated work.

### Final rules with preamble for details of rulemaking:

<https://www.govinfo.gov/content/pkg/FR-2024-11-12/pdf/2024-25070.pdf>

12-9-2024