

Paint Chip Sample Collection Guide

Lead Renovation, Repair and Painting Program - October 2011



What is the *Paint Chip Sample Collection Guide*?

This document, the Paint Chip Sample Collection Guide, provides step-by-step instruction in how to collect paint chip samples and submit them for analysis to a laboratory recognized by the National Lead Laboratory Accreditation Program (NLLAP).

Whom does this guide apply to?

This guide applies to Certified Renovators who want to use paint chip sampling to determine whether lead-based paint is present on components to be disturbed during a renovation.

When is it appropriate to use this guide?

EPA's Renovation, Repair, and Painting (RRP) Rule covers renovations in target housing and child-occupied facilities built before 1978. The RRP rule does not require any paint testing. However, many provisions of the RRP rule do not apply to renovations where a Certified Renovator determines that the components that will be disturbed by the renovation are free of lead-based paint. Certified Renovators must make this determination for each component either by using an EPA-recognized test kit or by collecting a paint chip sample and submitting it to an NLLAP laboratory for analysis. Certified Renovators should use this guide as they collect and submit paint chip samples for this purpose.

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Recommended Materials and Equipment

- Resealable rigid walled container for use as paint chip sample collection containers, e.g. screw-top plastic centrifuge tube
Note: Resealable plastic bags are not suitable for holding and transporting dried paint chip samples due to potential losses of paint chips during laboratory handling.
- Steel or plastic measuring ruler - metric only with millimeter and centimeter divisions
- Cloths for cleaning purposes
- White paper for making paper funnels (paint chip sample collection trays)
- Masking and duct tape
- Permanent (indelible) marking pen
- Personal safety gear
- Cutting and scraping tools:
 - Sharp-edged razor knife
 - Single-edged safety razor blades
 - Pocket knife with locking blade
 - Rigid blade paint scraper with extra blades
 - Flexible putty knife
 - Chisels
 - Hammer
- Flashlight
- Trash bags
- Plastic gloves, powderless
- Sample Paint Chip Sample Collection Form (www.epa.gov/lead/pubs/paintchip.pdf)

Note: Before you begin, take precautions to protect yourself and prevent the contamination of the area with lead dust. This may include using protective sheeting in the sampling area and donning the appropriate personal protective equipment (PPE). You should clean all tools used as well as the sampling area after each sample collection.

Step 1: Write the required information about the test location and sample on a paint chip sample collection form and paint chip sample container

The field collection report should include, at a minimum:

- Project or client name
- General sampling site description
- The name of the person collecting the samples

The paint chip sample container should include, at a minimum:

- A unique identifier
- Dimensions of the sampled surface in centimeters (include measuring units)

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Step 2: Outline the collection area

- Using a ruler, draw an outline of the sampling area on the painted surface with a permanent marking pen.
- Record the dimension of the outline in centimeters.
- Score the outlined area with a razor knife or equivalent cutting tool.
- Use the cutting tool to retrace the outline area.
- Clean the ruler with a cloth.

Note: Samples generally should be at least 2.5 cm x 2.5 cm (equivalent to about 1 in²), however, the minimum sample size needed may vary by laboratory. Therefore, it is advisable to contact the NLLAP laboratory that will be analyzing the sample to determine their minimum sample size requirement.

Step 3: Set up a paint chip sample collection tray

For Horizontal Surfaces

- Use a sheet of letter-size white paper for making a paper funnel for paint chip sample collection. In cases where the sampling location is too small to accommodate a funnel made with a sheet of the letter-size paper, cut the paper to an appropriate smaller size.

For Vertical Surfaces

- Center a piece of tape along one of the long edges of a clean sheet of white paper. The tape should be slightly shorter than the paper and placed so that sufficient adhesive is available to firmly stick the paper to the paint surface.
- Stick the paper directly below the location to be sampled with the taped edge closest to the scored location.
- Pull the two lower corners of the paper together and overlap slightly to form a funnel.
- Secure with a piece of tape.
- Fold the bottom of the newly formed funnel up and use a piece of tape to close off the funnel bottom. Be sure no sticky tape surfaces are exposed on the inside of the funnel.

For Overhead Horizontal Surfaces (Painted Surfaces Facing Down)

- Make a closed-bottom funnel in the same manner as described in “For Vertical Surfaces.”
- Affix the funnel to the painted surface in a way so that it is directly under the location to be sampled without impeding access to the surface, or attach the funnel to a ladder beneath the sample location.

Step 4: Remove the paint chip sample

- Using a cutting tool, begin removing the paint chip sample from the substrate.
- Peel the paint chip sample from the substrate by sliding the blade along the score and underneath the paint chip sample.
- If problems are encountered in removing the paint chip sample, use a scraping tool or other equivalent tool to aid in paint chip sample removal.

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Step 5: Transfer the collected sample to the paint chip sample collection container

- Remove the paint chip sample collection tray from the sampling location. Avoid any sample spillage.
- Carefully tap all the collected paint chip sample into the paint chip sample collection container.
- Seal the paint chip sample collection container.
- Dispose of paint chip sampling trays made of paper in a trash bag.
- If a reusable paint chip sample collection tray is used, clean it thoroughly with a cloth and allow it to dry completely before reusing it at a new sampling location.

Note: Carefully clean the area of all dust using a wet wipe procedure.

Step 6: Clean all cutting tools used during paint chip sample collection

- Clean all cutting tools used during paint chip sample collection with a cloth.

Step 7: Check documentation for completeness on the *Paint Chip Sample Collection Form*

- Ensure all required documents and paint chip sample collection containers are completely labeled.

Step 8: Submit the paint chip sample for lead analysis to a NLLAP-recognized laboratory

- A list of NLLAP-accredited laboratories is available at www.epa.gov/lead/pubs/nllaplist.pdf.
- Record all results reported from the laboratory.

Step 9: Document paint chip sample lead analysis results

- A report of the findings from the submitted paint chip samples must be given to the person contracting for the work within 30 days following the completion of the renovation work. The Certified Firm should keep the completed Paint Chip Sample Collection Form for 3 years after the work is completed.

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**Remodeling, Repair and Painting
Sample Paint Chip Collection Form**

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Name of Owner/Project: _____
Address: _____
City: _____ State: _____ Zip code: _____ Contact # (____) ____-____
Email: _____

Renovation Information

Fill out all of the following information that is available about the Renovation Site, Firm and Certified Renovator.

Renovation Address: _____ Unit #: _____
City: _____ State: _____ Zip code: _____
Certified Firm Name: _____
Address: _____
City: _____ State: _____ Zip code: _____ Contact #: (____) ____-____
Email: _____
Certified Renovator Name: _____
Date Certified ____/____/____

Paint Chip Sample Information

For each sample collected, fill out all of the following information

Sample Identifier: _____
Sample Collector Name: _____
Sampling Location: _____
Sampling site description: _____ Date of Collection: ____/____/____
Sample Dimensions (cm): _____ Calculate Sample Area (cm²): _____
NLLAP-recognized entity and location: _____
Submission date: ____/____/____ Results: _____ Result Date: ____/____/____

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Renovation Address: _____ Unit #: _____

City: _____ State: _____ Zip code: _____

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