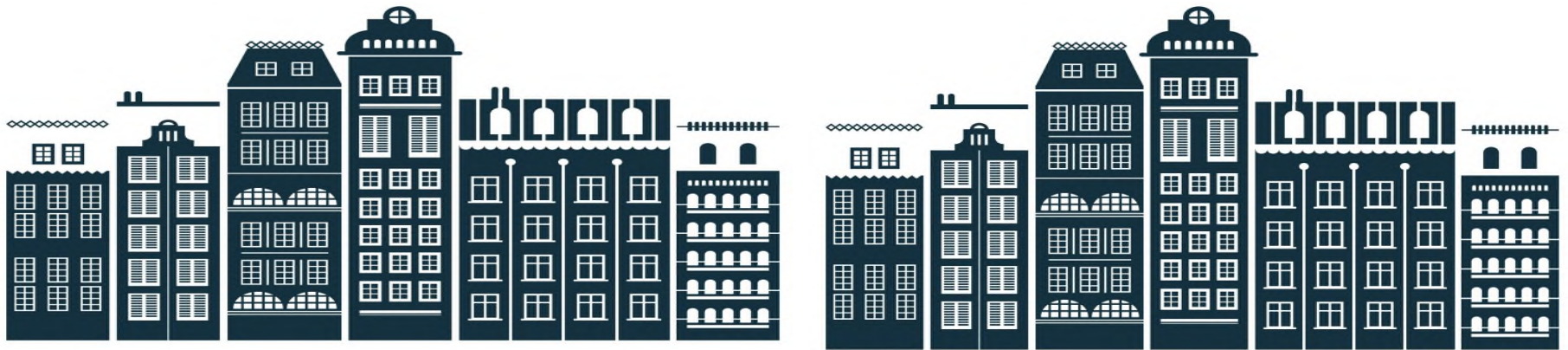


U.S. Department of Housing and Urban Development (HUD)
Office of Lead Hazard Control and Healthy Homes (OLHCHH)

2019 Program Manager School

LEAD HAZARD CONTROL 201
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Minneapolis, MN

Scope of Work

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- ✓ **Scope of work must correlate with the LIRA and recommended remediation options.**
- ✓ Whatever is placed in the scope of work is what the contractor will be held responsible for – must be thorough.
- ✓ Be specific – document number of components (i.e. 5 doors), measurement (i.e. sq. ft.), location (i.e. bedroom) and treatment (i.e. paint stabilization/replacement), etc.
- ✓ Scope of Work should include the “How” work is to be completed.



Abatement vs. Interim Controls

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Abatement – any set of measures designed to “permanently” eliminate lead-based paint or lead-based paint hazards:

- ✓ Paint Removal
- ✓ Enclosure
- ✓ Encapsulation
- ✓ Replacement
- ✓ Removal or “permanent” covering of soil-lead hazards.
- ✓ Abatement is performed in compliance with methods and standards under a program authorized by the EPA 40 CFR 745.227 (e)

Interim Control – measures designed to reduce “temporarily” human exposure or likely exposure to LBP hazards.

- ✓ Paint Stabilization
- ✓ Friction and Impact Surface Treatment
- ✓ Dust Control
- ✓ Soil Interim Controls



Terminology

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Deterioration – Paint is disturbed and causing dust:

Surface Deterioration – chalking, mildew

Bulk Deterioration – checking, cracking, alligatoring

Layered Deterioration – blistering, scaling,



Friction Surface – any surface that rubs against another (ex. Windows).

Impact Surface – surface that has forceful contact over and over again.

Chewable Surface – an interior or exterior surface painted with LBP that a young child can mouth or chew. A chewable surface may also be called an “accessible surface”



- ✓ What is “**Permanent**”?

Answer: Expected design life of at least **20 years**.

- ✓ What is “**Temporary**”?

Answer: Expected design life of **less than 20 years**.

When choosing treatments, consider the probability of its endurance.



Abatement Treatment Strategy

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- ✓ **Component Replacement:** **Pros** - Permanent solution; can improve building through upgrades; can lower heating bills and maintenance costs: **Cons** - May involve demolition work; PPE may be necessary.
- ✓ **Enclosure:** **Pros** - Uses locally available materials; durable and long-lasting; low generation of waste and dust: **Cons** - LBP is still there - LBP may be disturbed during routine work on enclosure - Enclosed surfaces must be monitored for damage.



Abatement Treatment Strategy, cont'd

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- ✓ **Encapsulation:** Pros - Little dust is generated -lower cost than other abatement options -many choices are available: **Cons** - LBP is still there - LBP may be disturbed during routine work on enclosure - **NOT** useful for impact for friction surfaces - may create hazardous waste.
- ✓ **Paint Removal:** Pros - LBP is gone – maybe? - Useful for historic preservation projects or detailed components: **Cons** - Tedious and time-consuming - dust is generated - strippers create hazardous waste - Surface must be properly prepared or new surface will fail.



Interim Control Treatment Strategy

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- ✓ Reason for deterioration must be corrected – dry-rot, rust, moisture-related defects, crumbling plaster.
- ✓ Surface must be properly prepared/repared. –
- ✓ Remove damaged paint (remember prohibited activities).
- ✓ Remove damaged components
- ✓ Allow sufficient time to dry.



Interim Controls, cont'd

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- ✓ **FRICITION AND IMPACT SURFACES TREATMENT**
- ✓ For friction surfaces - Eliminate friction points or treat the friction surface so that paint is not subject to abrasion.
- ✓ Rehanging/planning doors so that the doors do not rub against the door frame.
- ✓ Installing window channel guides that reduce or eliminate abrasion of painted surfaces.
- ✓ Paint on stair treads shall be protected with a durable cover or coating (ex. carpeting, tile, and sheet flooring).
- ✓ For impact surfaces – Protect the paint from impact.
- ✓ Installation of treatments that eliminate impact with the painted surface (ex. Door stop to prevent a door from striking a wall or baseboard).



Interim Controls, cont'd

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- ✓ CHEWABLE SURFACE TREATMENT
- ✓ According to LSHR – chewable surfaces are required to be treated if:
- ✓ There is evidence of teeth marks indicating a child of less than 6 years of age has chewed on the painted surface, and
- ✓ LBP is known to be present on the surface.
- ✓ Interim control for chewable surface – treatment to make the LBP inaccessible for chewing by children less than 6 years of age.
- ✓ Enclosures, or coating that cannot be penetrated by the teeth of a child.



Interim Controls, cont'd

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Dust Control Methods

- ✓ Thorough cleaning of all horizontal surfaces, such as window sills, window troughs, floors, and stairs.
- ✓ Start at the top and work down.
- ✓ Utilize a HEPA Vacuum – Wet Wipe – HEPA Vacuum Cycle
- ✓ Horizontal surfaces such as floors, stairs, window sills and window troughs, that are rough, pitted, or porous shall be covered with smooth, cleanable covering or coating (plastic, polyurethane, or linoleum).
- ✓ Consider replacement of dust “traps” such as carpet and area rugs, upholstery, radiators, HVAC filters, registers, window troughs, hardwood floor gaps.
- ✓ Dust only projects are not eligible for grant funding.



Interim Controls, cont'd

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DUST CONTROL METHODS - CARPETING

- ✓ Floor surface under a rug or carpeting shall be cleaned where feasible, including upon removal of the rug or carpeting, with a HEPA Vacuum.
- ✓ When carpet is unattached in an area with LBP hazards - Protective measures shall be used to prevent the spread of dust during removal of a rug, carpet or padding from the dwelling (ex. Misting).
- ✓ Items shall be wrapped or otherwise sealed before removal from the worksite.
- ✓ Follow PGI 2013-04 Lead Hazard Evaluation and Control of Lead Dust Hazards in Carpeting.



Bidding the Work

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- ✓ Determine bidding process (i.e. lowest responsive bid, round robin, fixed price, blanket purchase order, etc.)
- ✓ Provide contractors with scope of work and LIRA.
- ✓ GTR approval for over cost projects (Lead -\$20,000; HH \$5,000).
- ✓ Contract for work should be with contractor, grantee and owner.
- ✓ Issue Proceed Order with project completion date (10 days).
- ✓ Retain all submitted competitive bids in the case file. File retention: at least 3 years from the end of the award's period of performance.



Occupant Protection Plan 40 CFR 745.227 & 24 CFR 35.1345)

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- ✓ REQUIRED for abatement
- ✓ Unique to each project.
- ✓ Describe the measures and management procedures that will be taken during the abatement to protect the occupants from exposure to any lead-based paint hazards.
- ✓ Developed prior to abatement in consultation with occupant.
- ✓ Developed by Certified Lead Supervisor or Project Designer.



Temporary Relocation

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- When should occupants be temporary relocated?
- ✓ the lead hazard reduction and the final cleanup of the work area and adjacent areas cannot be accomplished in one 8 hour working day; and
 - ✓ the areas available for occupancy do not provide sufficient bathroom, kitchen and sleeping facilities and entry egress pathways to meet the needs of the occupants; and
 - ✓ during high dust generating lead activities.



Work Practices Video Links

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- [EXTERIOR WORK PRACTICES](#)

- [INTERIOR WORK PRACTICES](#)



Work Project Management

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Grantees are responsible for monitoring job worksites

- ✓ Has the worksite been set up properly and in compliance with Local/State/EPA/HUD regulations, and does the setup appear to be working as planned?
- ✓ Are residents being kept out of the work area?
- ✓ Are workers avoiding the use of prohibited work practices?
- ✓ Is waste being handled correctly?
- ✓ Are workers using worker protection methods appropriate to the job?



Work Project Management, cont'd

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- ✓ Document all worksite monitoring (findings, corrections made) in the case files.
- ✓ Conduct a visual inspection of the project to insure all work has been completed in accordance with the Scope of Work before scheduling clearance testing.



Clearance Testing

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- ✓ A Clearance inspection is required for each unit receiving funding under the Lead Hazard Control Grant program.
- ✓ Clearance can be conducted 1 hour after cleanup.
- ✓ Conduct Visual Assessment (Form 15.1): The visual assessment that is part of the standard EPA-HUD clearance procedure.
 - (1) to identify any remaining deteriorated paint that is or may be lead-based paint; and
 - (2) to identify visible dust, paint chips; or paint-related debris.



Clearance Testing, cont'd

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- ✓ The purpose of clearance is to test the containment methods used and ensure safety of the unit prior to re-occupancy.
- ✓ The expectation is the unit will receive a full clearance which means the sampling must be randomized and include both rooms that work was done and not done, entry ways, and exterior visuals. PLUS PORCHES!!!
- ✓ Area(s) determined to be high risk/high use areas for children.



Clearance Testing, cont'd

Lead Clearance Standards ($\mu\text{g}/\text{sf}$)

	EPA Standard	New Action Level
Floors	< 40	< 10
Window Sills	< 250	< 100
Window Troughs	< 400	< 100
Porch Floors	NA	< 40



Post Remediation

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- ✓ Provide the owner with all documents (LIRA, Scope of Work, Clearance Test Results).
- ✓ Provide the owner with an On-going Maintenance Plan.
- ✓ Conduct at least one reevaluation of project to monitor the effectiveness of hazard control methods used.

