

## Lead Abatement Practices & Regulations

**Abatement:** Any measure or set of measures designed to permanently eliminate lead-based paint hazards. Including but not limited to:

- Removal of Lead-based paint and Lead-contaminated Dust
- Permanent Encapsulation or Enclosure of lead-based paint
- Replacement of Lead-painted surfaces or fixtures
- Removal or permanent covering of lead-contaminated soil
- All preparation, cleanup, disposal and post-abatement clearance testing activities

**Abatement Professionals:**

Lead Inspector, Risk Assessor, Project Supervisor, Contractor, Project Designer & Lead Worker

### Abatement Procedures

	HUD	EPA	IDOH
<b>Risk Assessment &amp; Inspections</b>	Arrange for <b>Risk Assessment</b> or <b>Paint Inspection</b> performed by Certified Risk Assessor independent of abatement contractor. Risk Assessor creates site-specific <b>Hazard Control Plan (HCP)</b> : includes description of hazards, control and financing options <b>Lead Hazard Levels:</b> <ul style="list-style-type: none"> <li>◦ Floor: <math>\geq 10\mu\text{g}/\text{ft}^2</math></li> <li>◦ Sill: <math>100\mu\text{g}/\text{ft}^2</math></li> <li>◦ Soil (Play): 400ppm</li> <li>◦ Soil (Non-Play): 1200ppm</li> <li>◦ Water: 15ppb</li> </ul>	Same as HUD, In addition Risk Assessment must include: Visual Inspection to locate any physical signs of deterioration or hazards, Environmental sampling for lead in paint, dust and soil, and a determination of the presence of lead-based paint hazards <b>Lead Hazard Levels:</b> Same as HUD	Same as HUD, Certified Risk Assessor must also be licensed by the State of Indiana. Risk Assessor must submit HCP in the form of Risk Assessment Report in I-Lead, Indiana's lead assessment database.
<b>Abatement Planning &amp; Approval</b>	Collection of required Permits and Documents: Waste & Building Permits Written Occupant Protection Plan, Worksite Warning Signs	Collection of required documents: Occupant Protection Plan, Post signs clearly defining work area and work being conducted; Must complete Pre-Renovation education: provide occupant education materials (Approved EPA Renovation-specific pamphlet) and Written Acknowledgement from occupant of renovation and education	Must provide written notification to IDOH of each project using <a href="#">State Form 49150</a> . Notification must include Written Occupant Protection Plan (OPP), Contractor Information, Site information and Work to be completed, scheduled work days and estimated start and completion dates. Must have warning signs posted on entrances to job site, contractor work hours and all licenses of active workers on-site, including supervisor

<p><b>Work Area Containment &amp; Abatement Execution</b></p>	<p>Correct any housing conditions or other work that might disturb lead surfaces, Execute Abatement work according to Hazard Control Plan and following Lead-Safe Work Practices</p>	<p>Contractor must be EPA-certified; Contractor must properly contain work area, where the abatement work is set to take place: <b>Interior:</b> Remove all objects from work area, any objects that remain must be wrapped; Close/Cover all ducts, windows and doors; Cover floor surfaces with plastic sheeting; Seal off non-work areas; Ensure safe passage through common area group if necessary <b>Exterior:</b> Close all doors/windows within 20 feet; Set up plastic sheeting barrier in doors that allow workers to pass through; Cover ground with plastic extending 10 feet beyond perimeter; Weight the sheeting at foundation and along edges, especially if liquid waste will be present</p>	<p>Contractor must design and complete each project within HUD and EPA regulations. Work must be completed with appropriately licensed individuals. Work must be completed using lead-safe work practices (LSWP). Licensed supervisor must be on site for the duration of all abatement-related activities.</p>
<p><b>Restricted Abatement Methods</b></p>	<p>Open Flame burning/torching, Machine sanding/grinding without HEPA vacuum, Abrasive blasting without HEPA vacuum, Heat Guns over 1100 °F, Dry Scraping, and Using volatile paint stripper in poorly ventilated area</p>	<p>Open Flame burning/torching, Use of high-speed operated machines without HEPA vacuum attachment, and operating Heat Gun over 1100 °F.</p>	<p>Same as HUD</p>
<p><b>Clearance Procedure</b></p>	<p>Conduct daily and final cleanup: Vacuum cleaning using approved HEPA filtered tools, Arrange for independent certified inspector to conduct clearance exam after at least 1 hour after cleanup has been completed. If fail, repeat cleaning and clearance exam <b>Lead Clearance Levels:</b> ◦Floor: 10µg/ft<sup>2</sup> ◦Sill: 100µg/ft<sup>2</sup> ◦Trough : 100µg/ft<sup>2</sup> ◦Porch: 40µg/ft<sup>2</sup></p>	<p>Same as HUD, In addition, Execute waste disposal procedures: all components coated with lead-based paint must be wrapped in plastic and taken to proper EPA certified waste management facility <b>Lead Clearance Levels:</b> ◦Floor: 10µg/ft<sup>2</sup> ◦Sill: 100µg/ft<sup>2</sup> ◦Trough: 400µg/ft<sup>2</sup> ◦Porch: N/A</p>	<p>Same as HUD; Clearance Examination must be completed by an Risk Assessor or Lead Inspector licensed through IDOH <b>Lead Clearance Levels:</b> ◦Floor: 10µg/ft<sup>2</sup> ◦Sill: 100µg/ft<sup>2</sup> ◦Trough: 400µg/ft<sup>2</sup> ◦Porch: N/A</p>

<p><b>Monitoring</b></p>	<p>Periodic monitoring and reevaluation for enclosure or encapsulation required by property owner. Any records must be a part of lead disclosure.</p>	<p>Same as HUD</p>	<p>Same as HUD</p>
<p><b>Abatement Record Keeping</b></p>	<p>No Specific Requirements</p>	<p>No Specific Requirements</p>	<p>All record should be completed no later than thirty (30) days after the completion of project. Contractor shall provide reports to property owner within 30 days and the department within 5 days. Maintain proper records for minimum of three (3) years and includes: Abatement project design, start and completion dates, OPP, and receipt of waste disposal sites Contractor must allow reasonable access to records by IDOH staff</p>

## Reference Images

Examples of Warning Signs and OPP posted to entrance of property for duration of project



Examples of Barriers, Pathways, and Containment using 6mil Plastic Sheeting and Caution tape



Hud Guidelines, Chapter 12: <https://apps.hud.gov/offices/lead/lbp/hudguidelines/Ch12.pdf>

EPA RRP Rule: <https://www.ecfr.gov/current/title-40/chapter-I/subchapter-R/part-745/subpart-E>

Indiana Lead Administrative Code: [https://www.in.gov/health/files/410\\_IAC\\_32.pdf](https://www.in.gov/health/files/410_IAC_32.pdf)

Indiana Lead & Healthy Homes: <https://www.in.gov/health/lead-and-healthy-homes-division/abatement-information/>