

Health Hazards Control Unit: Guidance for Lead-Based Paint Abatement Work Practices

To ensure that lead-based paint abatement activities are conducted safely and to reduce children’s exposure to lead, all abatement activities performed on target housing and child-occupied facilities must be conducted in accordance with the requirements of the North Carolina Lead-Based Paint Hazard Management Program (LHMP) Rules 10A NCAC 41C .0800, and 40 CFR 745 Subpart D and Subpart L, Subsection .227.

This document was prepared as a result of concerns about work site preparation and work practices observed on lead-based paint abatement projects throughout North Carolina. It is not intended to be a comprehensive list and does not include all of the requirements incorporated in the regulations listed above. Prior to conducting lead-based paint abatement activities, all personnel associated with the project should review and fully understand the requirements of ALL applicable local, state, and federal regulations that may apply to the worksite.

Resident Protection and Worksite Preparation

1. The Resident Protection and Worksite Preparation information from Chapter 8 of the Housing and Urban Development (HUD) Guidelines for the Evaluation and Control of Lead-Based Paint Hazards in Housing, Second Edition, July 2012, apply to all abatement projects. Abatement contractors are responsible for protecting the residents’ belongings from becoming contaminated with leaded dust and for preventing leaded dust from migrating beyond the work area.
2. All paint chips present on the ground or floor must be removed before plastic sheeting or other impermeable material is laid down.
3. Containment measures must be designed to prevent the release of leaded dust, which can be spread by workers’ shoes or by airborne dust.
4. Plastic sheeting used to protect floors or ground must be taped or otherwise secured to the walls of the dwelling to ensure containment of contaminants.
5. All damaged substrates must be repaired or replaced before the site can be prepared for encapsulation and/or enclosure.
6. No debris, plastic sheeting or impermeable materials may be left outside the dwelling overnight, or in any area where a passerby or a child could come in contact with these materials.
7. Residents should not remain in a dwelling when lead-based paint abatement is performed. If residents must remain inside the dwelling while work is being conducted or must return to the dwelling in the evenings, then a dust sample shall be collected and analyzed. The dust sample shall be collected at the end of each workday from the living area at greatest risk of contamination.
8. All windows will be kept closed during interior or exterior lead hazard control work to prevent dust and chips from migrating into or out of the unit.

Abatement

1. All lead-based paint abatement activities shall be conducted in accordance with Chapter 12 of the Housing and Urban Development (HUD) Guidelines for the Evaluation and Control of Lead-Based Paint Hazards in Housing, Second Edition, July 2012.
2. Warning signs must remain posted until clearance is passed. This includes barrier tape.
3. When a dumpster is being used to store waste, wrapping and bagging of bulk debris is not necessary as long as the dumpster is lined with plastic sheeting, is secured and has warning signs posted. All pathways to the dumpster shall be lined with plastic sheeting so as not to contaminate the area during transport of material from the structure to the dumpster.

4. The surface of any item that is to be enclosed must be labeled, horizontally and vertically, approximately every 2 feet with a warning, “Danger: Lead-Based Paint”. All seams around the enclosure must be sealed.
5. Maximum allowable lead concentrations in replacement soil shall not exceed 200 ug/g.
6. Encapsulation shall be applied in a manner that meets the manufacturer’s specifications. Documentation that the encapsulants’ manufacturer specifications have been met, such as results of patch tests and thickness of encapsulant should be maintained for all encapsulation projects.
7. The following is a list of prohibited lead-based paint abatement methods:
 - Open flame burning or torching (includes propane-fueled heat grids).
 - Machine sanding or grinding without HEPA local vacuum exhaust tool.
 - Uncontained hydroblasting or high-pressure wash.
 - Abrasive blasting or sandblasting without HEPA local vacuum exhaust tool
 - Heat guns operating above 1,100 F.
 - Chemical Paint Stripping in poorly ventilated space and methylene chloride paint removal products.
 - Dry scraping (except for limited surface areas).
8. Encapsulation is not an appropriate form of abatement for impact or friction surfaces.
9. Exterior abatement should not be conducted when the winds exceed 20 miles per hour.

Clearance

1. All lead-based paint clearance sampling shall be conducted in accordance with 40 CFR 745 Subpart D and Subpart L, Subsection .227.
2. Clearance dust sampling is to be performed no sooner than 1 hour after completion of the final cleanup to permit airborne leaded dust to settle. A laboratory accredited by the National Lead Laboratory Accreditation Program (NLLAP) must be used to analyze samples.
3. A visual examination is to be conducted to determine whether the work on all interior and exterior surfaces to be treated was in fact completed and to ensure that no visible settled leaded dust or debris is present. If dust is observed, the contractor must repeat the cleaning effort before clearance dust samples are collected to avoid conducting dust sampling twice. All grounds around the dwelling will be examined visually to make certain that all waste and debris have been removed and that leaded dust or paint chips were not transferred outside the dwelling.
4. A visual inspection is to be conducted following any abatement on the exterior of a house to determine that all paint chips have been removed prior to any soil treatment being performed.
5. A visual clearance will be required after the breathable cloth material such as Tyvek™ or an equivalent material is installed if a non-lead certified siding company is used to install house siding. If a non-lead certified siding contractor installs the siding then a lead certified person (other than worker) will be on site during the siding installation. A visual clearance will also be required after completion of the siding installation.
6. Dust and soil sample collection shall be conducted in accordance to 40 CFR 745 Subpart D and Subpart L, Subsection .227.
7. Waste will not be left at the curbside for trash pickup; all waste will be removed from the site. Permits are to remain active until all waste is removed from the site and clearance has been achieved.

If you have any questions on the requirements for conducting lead-based paint abatement in North Carolina or if you need additional information, please contact the Health Hazards Control Unit at (919) 707-5950 or visit our website at: <http://epi.publichealth.nc.gov/lead/lhmp.html>