Lead-Based Paint Interim Control Plan

238 High Path Rd.
Windsor, CT

Town of Windsor Housing Rehabilitation Loan Program

Windsor Connecticut

October 3, 2024

EnviroPlan LLC
27 Trotwood Dr.
West Hartford, CT
06117

October 3, 2024

Flavia Rey de Castro
Community Development Specialist
Town of Windsor
275 Broad Street
Windsor, CT 06095

RE: Lead Based Paint Interim Control Plan
238 High Path Rd., Windsor, CT
EnviroPlan Project No. 2019-152-19

Dear Ms. Rey de Castro:

Enclosed please find the Lead-Based Paint Interim Control Plan required for the above-referenced site. The plan has been prepared in accordance with the requirements of Title X 1012/1013 regulations 24 CFR Part 35. For the purpose of this interim control plan, all building components with toxic levels of lead based paint in a deteriorated condition located within the single family home interior are included.

If you have any questions regarding the contents of the Plan, please do not hesitate to contact us.

Sincerely,

Neal B. Freuden
President
Connecticut Certified Lead Inspector/Risk Assessor 000152
Connecticut Certified Lead Planner Project Designer 000989
EPA Certified Lead Abatement Supervisor
EPA Certified Lead Safe Renovator
EPA Certified Instructor for the following Courses: Lead Inspector, Risk Assessor, Planner Project Designer, Abatement Supervisor and Renovator.

1 Introduction

Work outlined in this Plan includes scraping and repainting (paint stabilization) **Interior Building Components** that have been tested and determined to be to be coated with lead-based paint in a defective condition. The work shall be conducted in conformance with EPA regulations (40 CFR Part 745-Lead-Based Paint Poisoning Prevention In Certain Residential and Child-Occupied Structures, Subpart E-Residential and Child-Occupied Property Renovation.) and the HUD Lead Safe Housing Rule of Title X 1012/1013 regulations 24 CFR Part 35.

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2 Property Information

Property Address:	238 High Path Rd. Windsor, Connecticut
Property Owner(s):	Patricia Peck
Owner's Address:	238 High Path Rd. Windsor, Connecticut

3 Lead Consultant Contractor

Name:	EnviroPlan LLC
Address:	27 Trotwood Dr. West Hartford, Connecticut 06117 License Number 002085

4 Lead Inspector/Risk Assessor

Inspector/Risk Assessor's Name: Neal B. Freuden
Certificate Number: 000152
Date of Testing: 9/23/2024

Inspection/Risk Assessment Methodology: On-site x-ray fluorescence utilizing an RMD spectrum analyzer was used for the inspection Testing performed in accordance with HUD Guidelines and State of Connecticut regulations. Dust wipe and bare soil samples were collected as a part of the risk assessment.

Clearance inspection will entail a visual of interim control work and if satisfactory, the collection of dust wipe samples.

5. Lead Planner Project Designer

Name: Neal B. Freuden
Firm/Address: EnviroPlan LLC
27 Trotwood Dr.
West Hartford, Connecticut 06117
Certificate Number: 000989

6 Work Procedures for Interior Work

The following containment preparations and safe work practices shall be utilized during interim control procedures involving standard treatments and corrective procedures that disturb paint that exceeds the following (*de-minimus*) quantities:

- Interior large surfaces cumulatively greater than 2 square feet per room
- Interior small components where more than 10% of the paint is to be disturbed per room.
- Any amount of demolition requires lead safe work practices regardless of quantity. . Note: this exception to *de-minimus* quantities also applies to windows. Any amount of window removal and replacement requires lead safe work practices

The following containment preparations and lead safe work practices shall be utilized during component replacement, repair, surface preparation and repainting work on interior projects.

The procedures listed below may not be all inclusive. It is the responsibility of the Certified Firm and Certified Renovator(s) assigned to the project to follow the work preparation procedures and practices required under EPA regulations 40 CFR Part 745-Lead-Based Paint Poisoning Prevention In Certain Residential and Child Occupied Structures, Subpart E-

Residential and Child-Occupied Property Renovation and the HUD Lead Safe Housing Rule of Title X 1012/1013 regulations 24 CFR Part 35. .

A. If area working in has paint chips and debris on the floor, pre-clean the area using a HEPA vacuum. Move all objects possible out of the work area. Cover all objects in the work area which cannot be moved with disposable plastic sheeting. Lay protective disposable plastic sheeting on the floor below the area where work is taking place at least 6 feet in all directions. Raise the edge of the wall side plastic a few inches up the wall and secure with duct tape or alternative method. If space permits, extend the work area plastic farther out than 6 feet if necessary to contain dust and paint chips created by scraping and sanding activity. This may be especially needed when work is taking place on ceilings. If chemicals are being used to strip the paint, lay another layer of plastic sheeting over the first layer to capture the stripped chemical-laded debris and facilitate its removal from the work area without damaging the fist layer of protective sheeting covering the floor. "Work Wet" by misting the areas to be sanded and scraped first. This will retard the creation of lead dust which can be suspended in the air and cause contamination beyond the covering plastic as well as expose contractor personnel to hazardous levels of lead dust. **Remember: The Certified Firm and Certified Renovator are responsible to utilize containment methods that prevent contamination of the property.**

B. Limit access to the work area by placing and securing Warning Signs at all entrances and exits to the work area. Signs shall be in compliance with both EPA and OSHA requirements, including identifying lead as a poison, forbidding entry to unauthorized persons and forbidding eating, drinking and smoking in the work area.

C. Close all windows (unless windows are being replaced) and doors in the work area and seal with a layer of plastic sheeting. If a door in the work area needs to be accessed for entrance or exit to the work area, construct a 2 flap door system, with an S fold as prescribed by the EPA RRP program, to permit lead safe entry and exit without spreading lead dust to areas of the building not being worked on.

D. The HVAC system should be turned off and any HVAC vents in the work area covered and sealed with plastic sheeting.

E. Provide on-going cleaning of the work area to minimize the inadvertent tracking of lead dust from the work area and to facilitate final cleaning of the work area once the paint disturbance activities are completed.

F. Consider placing all required tools and equipment in the work area for the first few hours work so that area will not have to be left in order to complete that stage of the work.

G. Use protective disposable suits, painters hats, rubber gloves, and a N-100 respirator or better to protect personnel working on the project. **Note:**

Compliance with OSHA Lead in Construction Standard (1926.62) if it applies is the responsibility of the employer.

H. Use protective shoe covers, tack pads and have available cleaning materials to wipe off shoes prior to stepping off protective sheeting. Clean all equipment thoroughly before removing from the work area.

I. The following EPA and HUD Prohibited Work Practices apply to this project:

1. No burning or torching of the paint.
2. No use of heat guns in excess of 1100 degrees Fahrenheit. If the heat gun visibly chars the paint at lower temperatures, do not use.
3. No use of power equipment such as sanders, planers, grinders, blasters, needle guns, etc. to remove paint unless attached to a HEPA vacuum to capture the dust and debris.
4. No dry sanding or scraping
5. No use of volatile chemicals to strip paint in a poorly ventilated space.

7 Work Procedures for Exterior Work

Interim controls are defined as a set of measures designed to temporarily reduce human exposure or likely exposure to lead paint hazards, including specialized cleaning, repairs, maintenance, painting, and temporary containment. The following containment preparations and safe work practices shall be utilized during interim control procedures involving standard treatments and corrective procedures that disturb paint that exceeds the following (*de-minimus*) quantities:

- Exterior large surfaces cumulatively greater than 20 square feet
- Exterior small components where more than 10% of the paint is to be disturbed.
- Any amount of demolition requires lead safe work practices regardless of quantity. . Note: this exception to *de-minimus* quantities also applies to windows. Any amount of window removal and replacement requires lead safe work practices

Work involving the disturbance of paint that does not exceed the above quantities or does not involve demolition does not require the use of safe work practices or training of workers performing work as listed herein.

A. Exterior Preparation

1. Restrict access to the work area. Request any building occupants to leave the area where work will be performed. Request that they not return until work is completed. Place warning tape behind a 10 foot "buffer zone" measured from the edge of the containment (see item 3 below). Place warning signs along the taped perimeter.

2. Moveable objects belonging to residents must be removed from the work area. This includes but is not limited to any outdoor furnishings, etc. The belongings should be stored in an easily accessible location.

3. Protective disposable plastic sheeting placed on ground or exterior flooring or stairs shall extend 10'-0" in all directions from work surface or as space permits. If area working on is less than 10'-0" from a neighboring property or the street, use vertical shrouds to prevent dust and debris from impacting these adjacent areas. Build a small curb using 2 X 4 boards or similar materials at perimeter of sheeting to contain any paint chips or dust. Doors and windows within 20'-0" of the work area should be closed and sealed with protective sheeting.

4. Place all required tools and equipment in the work area so that area will not have to be left in order to complete the work. This will avoid stepping off the protective sheeting.

5. Use protective shoe covers, tack pads or have available cleaning materials to wipe off shoes prior to stepping off of protective sheeting.

8. Worker Protection and Training

There must be at least one person performing the work who is an EPA Certified Renovator. Other workers on the site, under the direction of the Certified Renovator, must have either the EPA Renovation, Repair and Painting (RRP) training certification (Certified Renovator training) or the HUD Lead Safe Work Practices training and certification.

Workers shall utilize eye protection, use disposable coveralls or coveralls that are to be laundered by employer, and respiratory protection. If respiratory protection is to be used worker must have a medical exam including pulmonary function test, questionnaire and receive additional training in accordance with OSHA regulations.

Workers shall ensure that dust is removed from protective clothing prior to leaving the work area, and wash hands and face prior to eating or drinking.

B. Interim Control Procedures

1. Paint Stabilization:
   - Wet scrape any loose flaking or peeling paint utilizing hand scraper and a spray bottle.
   - If removal of damaged edges is necessary mist surface prior to removing. skim and fill holes and cracks less than 1/16" wide with non shrink spackle compound. Nail heads exposed should be countersunk and holes filled with compatible wood putty. Alternatively nail heads at a minimum should be coated with an exterior primer that will prevent rusting of exposed nail heads.
   - If sanding of surface is necessary to feather edges, use wet abrasive sponge or wet dry sandpaper with water.

- Prepare entire surface for re-painting, by cleaning with high grade detergent (such as TSP) including de-glossing as necessary. Allow surface to completely dry before priming.
- Provide paint and/or stain in accordance with the Town of Windsor Housing Rehabilitation Program program requirements.

2. Component Removal: Mist the surface prior to removing. Care should be taken to mist areas thoroughly if demolition work is to be performed to minimize the creation of airborne dust and debris.

9 Clean Up Procedures (Work Involving Interim Control and to Eliminate Dust Hazards Identified at the Site)

A. General Cleaning Procedures

1. Debris - removed debris shall be wrapped in polyethylene sheeting for transport out of the interim control area.

2. Sheeting – Interior polyethylene sheeting shall be cleaned by HEPA vacuuming followed by wet misting. The polyethylene sheeting shall then be folded over upon itself to trap any remaining debris. Exterior polyethylene sheeting shall be wet misted and then folded over upon itself to trap any remaining debris.

3. Preliminary clean-up - After interior polyethylene sheeting has been removed, the vertical and horizontal surfaces in the work area shall be HEPA vacuumed and washed with a solution of Tri-Sodium phosphate (TSP).

4. The exterior surfaces shall be visually inspected by the Certified Renovator and any paint chips and other debris picked up and properly disposed.

10 Re-occupancy

A. Visual Inspection - After final cleaning, a licensed Lead Inspector or Lead Risk Assessor shall perform a visual inspection to identify any remaining dust.

B. Clearance Sampling - Upon acceptance of the work area, wipe sampling shall be conducted on the floors, window sills or window troughs in locations where interim control took place within the dwelling unit.

C. Clearance Wipe Sampling Criteria - The following dust wipe criteria shall be met prior to re-occupancy:

1. floors - 10 ug/ft^2
2. window sills - 100 ug/ft^2
3. window wells - 400 ug/ft^2

11 Waste Disposal

A. Lead construction waste shall be properly disposed of. Disposal of lead waste shall be accordance with all local, state, and federal regulations. Resulting waste must be tested to determine disposal requirements and properly disposed **unless the building owner agrees to take possession in writing of up to 10 cubic yards of waste and dispose of it as ordinary household waste under the Connecticut household hazardous waste exemption.** Any waste in excess of 10 cubic yards must be characterized or assumed to be hazardous waste and disposed of properly.

Waste characterization shall be determined by the Toxic Characteristic Leachate Procedure (TCLP).before the interim control work starts. The collection of the TCLP sample will be performed by a certified lead inspector with the assistance of the contractor.

1. Hazardous Waste is characterized as greater than 5mg/L of leachable lead by the TCLP analyses.

2. Non-hazardous Solid Waste is characterized as 0-5mg/L by the TCLP analysis.

According to CTDPH, waste characterization is the responsibility of the Lead Consulting Contractor who can be assisted by the Lead Safe Renovator in identifying the proper proportions of building components and substrates that comprise the waste stream. Under the direction of the lead consultant, the contractor can use various tools to create subsamples which will make up the ultimate sample which will be sent to a laboratory for TCLP analysis.

Owner _____

Signature_____

Date_____

LEAD-BASED PAINT INTERIM CONTROLS

36 FANEUIL STREET, WINDSOR, CT

SCOPE OF WORK

GENERAL NOTES:

1. The property is a single family two story house with a basement constructed circa 1974. Window systems are constructed of wood. The exterior is unpainted brick.

2. The workers must be properly trained and certified to perform lead safe work practices. A certified lead safe renovation contractor must be utilized in performing the required work.

3. All required lead paint interim control work shall be conducted in compliance with HUD regulation 24 CFR Part 35.

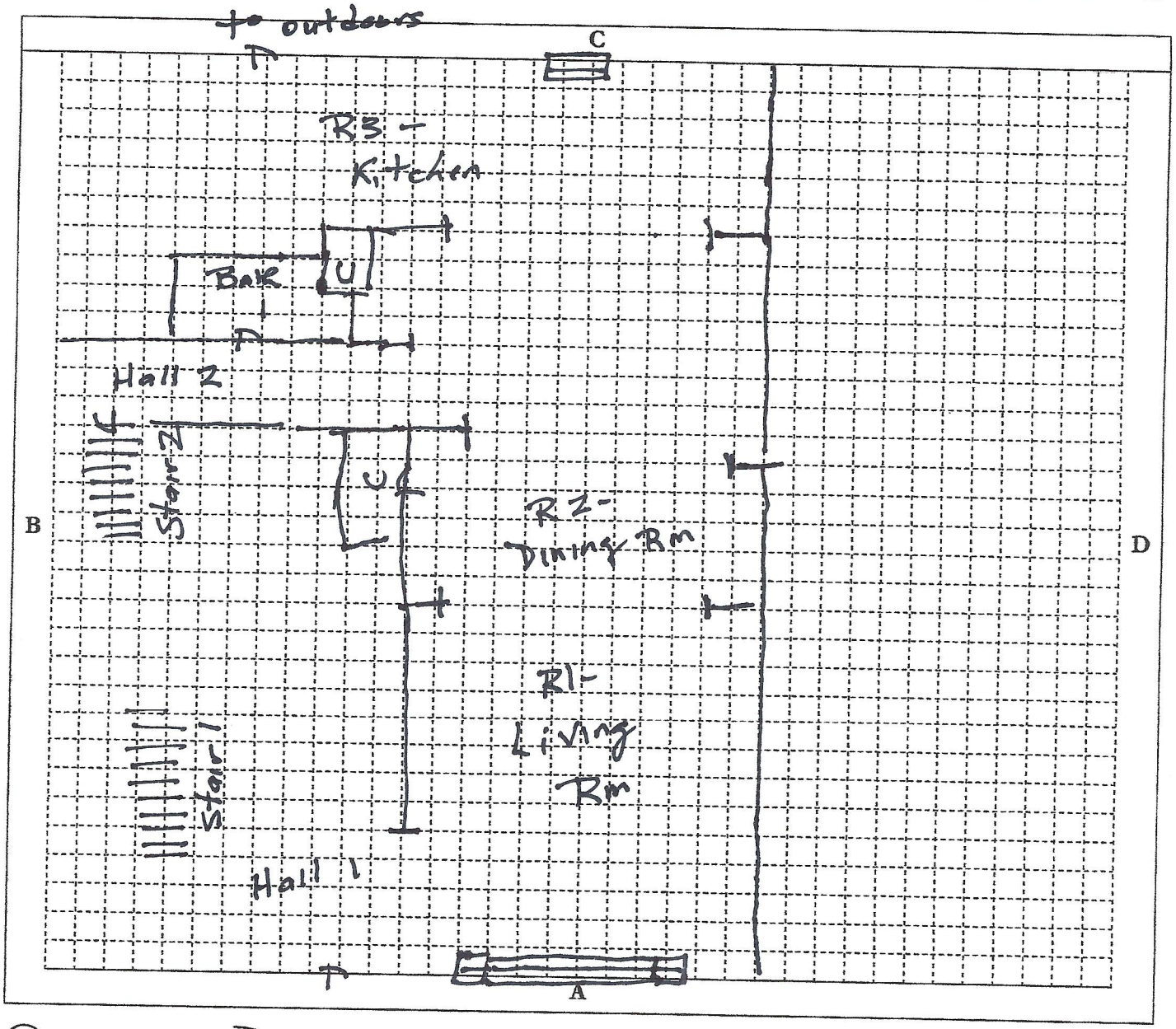
4. Lead safe renovation work involving removal of doors and related components (casings, jambs, kickboards and thresholds) and windows (sashes, trim, sills, etc.) must be performed in strict coordination with general trades work. Resulting waste must be tested to determine disposal requirements and properly disposed.

5. All <u>defective</u> lead based painted surfaces shall be interim controlled per this plan. Any remaining lead-based paint in an <u>intact</u> condition, is to be included in an in-place management plan and periodically inspected for defective paint.

LOCATION	COMPONENT	CONDITION	REMEDIATION METHOD
INTERIOR			
R2-Dining Room	Closet Door Note: This door is composed of two different types of wood. The main part might be classified as an antique with historical value and in some areas there is green paint in a deteriorated condition. This is paint is lead based and classified as a ***Lead Hazard.*** The other portion of wood in the door is relatively new and stained It is on the perimeter of all four sides of the door.	Defective	Option 1: Remove the door with lead safe work practices. If the homeowner wishes to replace the door, consult with her and the construction manager as to the various options in the marketplace. Option 2: Interim Control: Paint Stabilization and Re-Painting Provide removal of any areas of loose flaking paint and prepare surfaces for repainting. Provide paint in accordance with specifications from the Town of Windsor Housing Rehabilitation Loan Program

DIAGRAM OF THE FIRST FLOOR OF THE HOUSE

Project Name: Windsor Peck LIRA & Radon
Project Number: 2019-152-19
Address: 238 High Park Rd, Windsor, CT
Apt. #/Bldg #:
Floor: 1
Room:
Page ____ of ____
Number of Doors:
No. of Windows:
Diagram of: Floor 1



(#) Room Number Door Window

Page ____ of ____

Stair 1: First to Second Floor
Stair 2: 1st Flr to Basement