



Project Management & Construction Services

Standard Operating Procedures

I. Title: **Lead Abatement**

II. Purpose: Perform lead identification and abatement on certain projects to protect workers and nearby occupants from potential lead contamination.

III. Actions (Chronological Order)

1. Project Manager (PM) submits lead test request to EHS at the beginning of the Design Development Phase. Testing is required for projects with significant mechanical grinding, scraping or dust generation. Small scale activities are excluded including minor repairs such as patching, drilling or demolition work. Small scale is defined as:
 - (1) two square feet of deteriorated lead-based paint per room or equivalent;
 - (2) 20 square feet of deteriorated paint on the exterior building; or
 - (3) 10% of the total surface area of deteriorated paint on an interior or exterior type of component with a small surface area

Excluded projects shall require appropriate PPE as normal.

2. EHS or a third party performs lead testing to determine if the project area is contaminated with lead. If a third party is performing the lead test, EHS must review the test results.
3. If the Project Area is contaminated, the PM (in conjunction with EHS) determines who will perform the abatement.

If the project area is NOT contaminated, this process ends and the project moves forward without additional abatement requirements.

4. The PM holds a pre-abatement conference to discuss the abatement plan with the contractor and invites EHS to participate.
5. Contractor submits a notification form to the Texas Department of State Health Services (DSHS if) necessary (determined by DSHS requirements for Target Housing) and provides an electronic copy to PM and EHS.
6. PM has their consultant collect Toxicity Characteristic Leaching Procedure (TCLP) samples. The typical process is to collect samples on the first day of abatement to provide sufficient time to analyze and determine proper waste stream.



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7. Contractor performs abatement.
8. Contractor receives TCLP test results and communicates those results to the PM and EHS.
9. If the contaminant level is acceptable, the demolition debris can be disposed of as regular construction debris.

If the contaminant level is NOT acceptable, EHS will dispose of the hazardous debris.

10. After disposal, PM ensures that EHS receives a copy of the disposal manifest.

IV. References

TDSHS

Texas Environmental Lead Reduction Rules -- 25 Texas Administrative Code Texas Environmental Lead Reduction Rules Section 295 Subchapter I

[http://info.sos.state.tx.us/pls/pub/readtac\\$ext.ViewTAC?tac_view=5&ti=25&pt=1&ch=295&sch=I&rl=Y](http://info.sos.state.tx.us/pls/pub/readtac$ext.ViewTAC?tac_view=5&ti=25&pt=1&ch=295&sch=I&rl=Y)

OSHA

29 CFR 1926.62 - OSHA Lead in Construction Standard

http://www.osha.gov/pls/oshaweb/owadisp.show_document?p_table=STANDARDS&p_id=10641

29 CFR 1910.1025 - OSHA Lead in General Industry Standard

http://www.osha.gov/pls/oshaweb/owadisp.show_document?p_table=standards&p_id=10030

OSHA Technical Manual, Section V, Chapter 3 – Controlling Lead Exposures in the Construction Industry: Engineering and Work Practice Controls

http://www.osha.gov/dts/osta/otm/otm_v/otm_v_3.html

NIOSH

National Institute for Occupational Safety and Health, Protecting Workers Exposed to Lead-Based Paint Hazards A Report to Congress, January 1997

<http://www.cdc.gov/niosh/docs/98-112/pdfs/98-112.pdf>



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EPA

40 CFR Part 745 - Lead; Identification of Dangerous Levels of Lead; Final Rule
<http://epa.gov/superfund/lead/products/rule.pdf>

40 CFR Part 745, Chapter 227 - Distinct Painting History
<http://ecfr.gpoaccess.gov/cgi/t/text/text-idx?c=ecfr&sid=9b463cd69b805fbf6478c20d0371aefc&rgn=div8&view=text&node=40:31.0.1.1.14.6.1.5&idno=40>

40 CFR Part 745, Subpart L - Requirements for Lead-Based Paint Activities
<http://ecfr.gpoaccess.gov/cgi/t/text/text-idx?c=ecfr&sid=9b463cd69b805fbf6478c20d0371aefc&rgn=div6&view=text&node=40:31.0.1.1.14.6&idno=40>