

## Treatments to Address Lead-Based Paint 24 CFR Part 35

There are required minimum approaches for lead hazard reduction for every repair activity. Grantees may conduct additional lead hazard reduction measures beyond the minimum. All treatments require lead safe work practices and clearance unless testing demonstrates the absence of lead-based paint.

Treatment	Description	Evaluation	When to Use Treatment?	What is this Treatment?	Who Can Do the Work?
<b>Paint Stabilization and Repair of Disturbed Paint</b>	Repairs deteriorated paint (and substrates) on exterior and interior surfaces through repairs, safe paint removal, and repainting	Paint testing by qualified personnel on surfaces to be disturbed OR presumption (If only visual assessment performed to identify deteriorated paint).	<ul style="list-style-type: none"> <li>• Rehab ≤ \$5,000</li> <li>• ALSSO</li> <li>• Painted surface is disturbed during rehab or renovation</li> <li>• Repair deteriorated paint in TBRA, PBA, or PHA unit inspections for initial occupancy and ongoing maintenance</li> </ul>	<ul style="list-style-type: none"> <li>• Lead safe surface preparation</li> <li>• Repair of damaged substrate</li> <li>• Applying a new coat of paint</li> <li>• Lead safe work practices including prescribed cleaning</li> <li>• Clearance by independent certified entity</li> </ul>	<ul style="list-style-type: none"> <li>• RRP certified contactors and renovators</li> <li>• Abatement workers</li> <li>• Abatement contractor and supervisor</li> </ul>
<b>Interim Controls<sup>1</sup></b>	Limits potential to exposure to lead-based paint hazards through repairs, painting, maintenance, special cleaning, occupant protection measures, clearance, and education programs	Paint testing performed on surfaces to be disturbed. Risk assessment performed on entire dwelling.	<ul style="list-style-type: none"> <li>• Rehab &gt; \$5,000 - \$25,000</li> </ul>	<ul style="list-style-type: none"> <li>• Paint stabilization</li> <li>• Treatment for friction and impact surfaces</li> <li>• Treatment for chewable surfaces</li> <li>• Lead-contaminated dust control</li> <li>• Lead-contaminated soil control</li> <li>• Lead safe work practices</li> <li>• Clearance</li> </ul>	<ul style="list-style-type: none"> <li>• RRP certified contactors and renovators</li> <li>• Abatement workers</li> <li>• Abatement contractor and supervisor</li> </ul>

<sup>1</sup> Interim Controls: <https://www.hud.gov/sites/documents/LBPH-13.PDF>

Treatment	Description	Evaluation	When to Use Treatment?	What is this Treatment?	Who Can Do the Work?
<b>Standard Treatments</b>	Must be performed on <b>all</b> applicable surfaces, including bare soil, to control lead-based paint hazards that may be present	Presumption of lead-based paint <sup>2</sup>	<ul style="list-style-type: none"> <li>• Rehab &gt; \$5,000 - \$25,000</li> <li>• In lieu of risk assessment and interim controls</li> </ul>	<ul style="list-style-type: none"> <li>• Paint stabilization</li> <li>• Creating smooth and cleanable horizontal surfaces</li> <li>• Correcting dust-generating conditions</li> <li>• Addressing bare residential soil</li> <li>• Lead safe work practices</li> <li>• Clearance</li> </ul>	<ul style="list-style-type: none"> <li>• RRP certified contactors and renovators</li> <li>• Abatement workers</li> <li>• Abatement contractor and supervisor</li> </ul>
<b>Abatement<sup>3</sup></b>	Completely removes lead-based paint or controls surfaces with treatments having a 20-year life expectancy	Paint testing performed on surfaces to be disturbed. Risk assessment (RA) performed on entire dwelling.	<ul style="list-style-type: none"> <li>• Rehab &gt; \$25,000<sup>4</sup></li> <li>• All PBA and PHA units if RA identifies hazards</li> <li>• TBRA, PBA, and PHA units if EBLL child and RA identifies hazards (also other covered units)</li> </ul>	<ul style="list-style-type: none"> <li>• Removing lead-based paint and its dust</li> <li>• Permanently encapsulating or enclosing the lead-based paint<sup>5</sup></li> <li>• Removing/Replacing components with lead-based paint</li> <li>• Removing or permanently covering lead-contaminated soil</li> <li>• Lead safe work practices</li> <li>• Clearance</li> </ul>	<ul style="list-style-type: none"> <li>• Abatement workers (If supervised by an abatement contractor)</li> <li>• Abatement contractor and supervisor</li> </ul>

<sup>2</sup> If you presume rather than test for lead-based paint, must apply standard treatments and all applicable surfaces must be treated.

<sup>3</sup> Abatement: [https://www.hud.gov/sites/documents/CH12\\_ABATEMENT\\_121212.PDF](https://www.hud.gov/sites/documents/CH12_ABATEMENT_121212.PDF)

<sup>4</sup> To be exempt from safe work practices, the area of deteriorated paint in an interior room cannot exceed a total of 2 square feet or 10% of a component with a small surface area, such as interior windowsills, baseboards and trim. In other words, both thresholds apply at all times. For example, living room baseboards with 3 square feet of deteriorated paint cannot be exempted on the grounds that the 3 square feet constitutes less than 10% of the component. Similarly, deteriorated paint of an area of less than 2 square feet is not considered below the de minimis level if the area exceeds 10% of a small component, such as a windowsill. [See Interpretive Guidance R17.](#)

<sup>5</sup> Encapsulation and enclosure require ongoing maintenance to check their effectiveness.

## Description of Treatment Elements

**Clearance:** An activity required following lead-based paint hazard reduction activities or disturbance of paint above de minimis amounts to determine that the hazard reduction activities are complete and that no soil-lead hazards or settled dust-lead hazards, as defined in this part, exist in the dwelling unit or worksite. The clearance process includes a visual assessment and collection and analysis of dust samples. Clearance must be performed by certified personnel independent of the entity performing the work.

**Addressing Bare Residential Soil:** Soil is addressed using interim control methods including impermanent surface coverings such as gravel, bark, and sod as well as land use controls such as fencing, landscaping, and warning signs.

**Correcting Dust-Generating Conditions:** All conditions that generate dust from paint such as those that rub, bind, or crush surfaces with paint must be corrected. Examples include rehang doors, installing door stops, or reworking windows.

**Creating Smooth and Cleanable Horizontal Surfaces:** All horizontal surfaces that are rough, pitted, or porous such as bare floors, stairs, windowsills, and window troughs must be covered with a smooth, cleanable covering or coating such as metal coil stock, plastic, polyurethane, or linoleum.

**Lead-contaminated dust control:** All horizontal surfaces that are rough, pitted, or porous such as bare floors, stairs, windowsills, and window troughs must be covered with a smooth, cleanable covering or coating such as metal coil stock, plastic, polyurethane, or linoleum. Carpeting must be vacuumed, or rugs must be removed and vacuumed on both sides. Vacuuming must be done using HEPA vacuums, or equivalent.

**Lead-contaminated soil control:** If bare soil is lead-contaminated, interim controls that may be used include impermanent surface coverings such as gravel, bark, and sod as well as land use controls such as fencing, landscaping, and warning signs.

**Lead Safe Work Practices:** Practices include not occupant protection and worksite preparation, use of no prohibited methods, controlling dust through worksite containment, wet methods, and other protections, specialized cleaning, and clearance. They are required for work above the de minimis level.

**Paint stabilization:** Deteriorated lead-based paint on exterior and interior surfaces must be stabilized through repairs, safe paint removal, and repainting. The event of the work depends on the activity and the level of assistance.

**Treatment for chewable surfaces:** If a child under age six has chewed surfaces known or presumed to contain lead-based paint, these surfaces must be enclosed or coated so they are impenetrable.

**Treatment for friction and impact surfaces:** If abraded lead-based paint is found and associated dust lead levels exceed or are presumed to exceed acceptable levels, the conditions creating friction or impact with surfaces with lead-based paint such as those that rub, bind, or crush must be corrected. Examples of this work include rehang binding doors, installing door stops, covering or protecting the surfaces, or reworking windows.