

**Lead-Based Paint  
Abatement Plan**

**1037 N. Worthy Street  
Windsor, CT**

**Town of Windsor Housing  
Rehabilitation Loan Program**  
Windsor Connecticut

September 16, 2020

**EnviroPlan LLC  
27 Trotwood Dr.  
West Hartford, CT  
06117**

September 16, 2020

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

**RE: Lead Based Paint Abatement Plan**  
**1037 N. Worthy St., Windsor, CT**  
EnviroPlan Project No. 2019-152-4

Dear Ms. Rey de Castro:

Enclosed please find the Lead-Based Paint Abatement 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 abatement plan, all defective components containing toxic levels of lead located within the single family home interiors and exteriors are included.

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

Sincerely,

A handwritten signature in black ink, appearing to read "Neal B. Freuden". The signature is fluid and cursive, with a long horizontal stroke at the end.

Neal B. Freuden  
President

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## LEAD-BASED PAINT ABATEMENT PLAN Town of Windsor Housing Rehabilitation Loan Program

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**Attachments**

**End of Report**

EXHIBIT 1 - HOUSE FLOOR DIAGRAMS

# 1 Introduction

Work outlined in this Section includes the lead paint abatement required by the Housing and Urban Development (HUD) standards for all components and surfaces containing toxic levels of lead paint in a defective condition. The work shall be conducted in conformance with HUD regulations (24 CFR, Part 35, et al.). The work is being conducted to satisfy the requirements of federal HUD standards. Testing was conducted in accordance with HUD and State of Connecticut requirements. The dwelling unit is presently occupied; however, no children under the age of six reside in the dwelling.

The State of Connecticut regulations do not apply to the work based on the present occupancy of the home. However, the procedures recommended for abatement listed herein are consistent with requirements of the regulations as if a child under the age of six were in occupancy. The work listed herein is based on the HUD funding program(s) that the property receives.

## 2 HUD Program Requirements

The property is part of the following programs:

- HUD Rehabilitation Assistance Program (Single Family) Category 3 (over 25,000 per unit)

The more stringent requirements associated with the HUD Rehabilitation Assistance Program have been utilized in the preparation of this plan. The program requires the following:

- Distribution of pamphlet
- Risk Assessment of the property
- Abatement of Lead Hazards
- Clearance sampling following lead work
- Notice to occupants of lead remaining in dwelling units
- Ongoing Lead Paint maintenance

## 3 Property Information

Property Address: 1037 N. Worthy St.  
Windsor, Connecticut  
Property Owner(s): Kewanna Carlton  
Owner's Address: 1037 Worthy St.  
Windsor, Connecticut

## 4 Lead Consultant Contractor

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

## 5 Lead Inspector/Risk Assessor

Inspector/Risk Assessor's Name: Neal B. Freuden  
Certificate Number: 000152  
Date of Testing: September 1, 2020

**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 abatement work and if satisfactory, the collection of dust wipe samples.

## 6 Lead Planner Project Designer

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

## 7 Preparation prior to Work

- A. Post Warning Signs - Warning signs shall be posted at all entrances and exits to the work area.
- B. Repair work prior to interim controls or abatement shall include but not be limited to repair of defective plaster walls and ceilings.
- C. Residents may remain in the house during the abatement but must stay out of the work area and must have access to the bathroom.

## 8 Lead Paint Abatement Procedures

Lead paint abatement is defined as any set of measures designed to permanently eliminate lead based paint or lead based paint hazards. Abatement work included herein is required due to the condition of components and surfaces.

The following containment preparations and work practices are recommended for use during lead paint abatement procedures in accordance with Connecticut regulation 19a-111. The following procedures shall apply for all work involving the complete abatement of lead paint.

- A. Interior Preparation
  - 1. Moveable objects belonging to residents must be removed from the abatement area. The belongings should be stored in an easily accessible location.
  - 2. Cover and seal all non-work surfaces with 6-mil polyethylene as follows:
    - a. non-movable objects
    - b. air system(s) heating, ventilation, air conditioning (HVAC)
    - c. entrances to abatement areas
    - d. floors (2 layers)
  - 3. Signage. Prior to the preparation of a dwelling for abatement, the Contractor shall place warning signs immediately outside all entrances and exits to the work area, warning that de-leading work is being conducted in the vicinity. The signs shall be at least 20" x 14" and read:

**WARNING:  
LEAD PAINT REMOVAL HAZARD  
UNAUTHORIZED ENTRY PROHIBITED  
NO SMOKING, EATING, OR DRINKING  
ALLOWED IN THE WORK AREA**

Signs shall be in bold lettering with lettering not smaller than two inches (2") tall.

4. Construct and maintain suitable polyethylene barriers within the building to isolate the work.
5. Construct mini-containment chambers in order to facilitate abatement in lieu of preparing entire rooms for abatement. Seal the mini-containment chamber to the interior wall a minimum of six inches (6") from the component. Seal walls of the chamber to the two layers of six-mil polyethylene. Cover the ceiling with one (1) layer of six-mil polyethylene. A pre-fabricated airtight containment system may be used if approved by the Consultant.
6. Maintain polyethylene barriers, as long as needed for the safe and proper completion of the work. Any breaches in the work area barriers shall be corrected immediately and as necessary during the working day with such breaches reported immediately to the Owner.

B. Exterior Preparation:

1. Exterior abatement work shall require the installation of protective sheeting consisting of six-mil polyethylene sheeting from the foundation to a distance of three feet per story being abated or a minimum of five feet. If close to a street, use vertical shrouds to protect passersby. Build a small curb 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.
2. Lead workers should use protective shoe covers, tack pads or have available cleaning materials to wipe off shoes prior to stepping off of the protective sheeting.

C Abatement Procedures

General

1. Care must be taken so that leaded materials are not burned or abraded resulting in exposure to workers.

2. Care shall be taken to avoid damage to adjacent areas during component removal procedures. The Contractor shall run a utility knife around the edge (score) of the component to cut any bonding between substrates.
3. If components to be removed or enclosed contain areas of loose or peeling paint, these areas shall be wet scraped and HEPA vacuumed prior to abatement.
4. All paint chips, debris, or components shall be temporarily containerized or wrapped for transport to appropriate waste disposal dumpsters.
5. The following general abatement techniques shall be utilized in accordance with specific requirements of lead paint Scope of Work prepared for the site.
  - a. Replacement means removing components such as windows, doors, and trim that have lead painted surfaces and installing new components free of lead paint. Replacement components as specified elsewhere.
  - b. Rigid Encapsulation (enclosure): refers to processes that make lead paint inaccessible, by forming a barrier between lead based paint and the environment. The following are some types of rigid durable construction materials: gypsum dry wall, fiberglass, wood and vinyl siding. Materials must be mechanically fastened with seams sealed to prevent escape of lead dust. Provide extension plates at electrical outlets and switches as necessary.
  - c. Liquid Encapsulation: means the application of a covering or coating that acts as a barrier between the lead based paint and the environment that relies for its durability on adhesion between the encapsulant and the painted surface, and the integrity of the existing bonds between paint layers and between the paint and the substrate. Encapsulants are liquid (flexible) or cementitious coatings that provide a long lasting barrier over lead paint. An encapsulant prevents lead paint from becoming part of household dust or accessible to occupants.
  - d. Paint removal means stripping lead paint from the surfaces of components. The following are some of the paint removal processes that can be used; chemical stripping, mechanical stripping, and wet scraping.
    - **Chemical stripping**: Chemical strippers shall be applied in accordance with manufacturer's recommendations. Additional worker protection may be required when utilizing caustics.
    - **Mechanical stripping**: includes needle guns, belt and rotary sanders, abrasive blasting equipment. Mechanically powered abatement equipment requires the use of HEPA-equipped vacuum attachments to remove dust generated during the use of the equipment.
    - **Wet scraping**: involves misting the peeling paint before scraping and thus reducing the amount of lead dust generated during this process.
    - **Heat gun**: To prevent vaporization of the lead contained in the paint, the temperature of the heat gut should not exceed 700 degrees Fahrenheit in accordance with Connecticut regulations.



#### D Worker Protection and Training

6. Workers who will perform abatement work must have completed one of the following training courses:
  - EPA Lead Abatement Supervisor (40 hours)
  - EPA Lead Abatement Worker (32 hours)
7. Employers shall be required to monitor worker exposure during abatement activities as required by The Department of Labor and The Occupational Safety and Health Administration (OSHA) regulation "Lead in Construction Final Rule and Notice" CFR 1926.62
8. The minimum respiratory protection required for work shall be the half-face negative pressure respirator equipped with High Efficiency Particulate Air Filters (HEPA) capable of filtering 99.97 percent of mono-dispersed particles of .3 microns in diameter or greater. Additional respiratory protection shall be used if determined by personnel air monitoring data.
9. Workers shall be required to wear disposable Tyvek suits equipped with hoods and booties. No street clothes shall be permitted to be worn under Tyvek suits during abatement activities.

#### E. Lead Abatement Contractor

1. If a Lead Abatement Contractor is utilized they shall be licensed in the State of Connecticut to perform lead abatement activities.
2. If a Lead Abatement Contractor is utilized they shall possess insurance for lead paint abatement operations including pollution liability insurance.

## **9 Clean Up Procedures (Work Involving Abatement 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 abatement or 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.
5. Final cleaning (Interior abatement only) - Final cleaning shall be conducted no earlier than 1 hour after completion of active abatement. The abatement areas including all horizontal surfaces and floors shall be HEPA vacuumed, washed with TSP, and HEPA vacuumed again.

## 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 abatement area, wipe sampling shall be conducted on the floors, window sills or window troughs in locations where abatement 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 - 40 ug/ft<sup>2</sup>
  2. window sills - 250 ug/ft<sup>2</sup>
  3. window wells - 400 ug/ft<sup>2</sup>

## 11 Waste Disposal

- A. Lead abatement waste shall be properly disposed of. Disposal of lead waste shall be in 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 legal title in writing to up to 10 cubic yards of waste and dispose 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).

1. Hazardous Waste is characterized as greater than 5ppm by the TCLP analyses.
2. Non-hazardous Solid Wasted is characterized as 0-5ppm by the TCLP analyses.

According to CTDPH, waste characterization is the responsibility of the Lead Consulting Contractor who can be assisted by the Lead Abatement Contractor 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 ABATEMENT

1037 N. WORTHY ST., WINDSOR, CT

## SCOPE OF WORK

### GENERAL NOTES:

1. The property is a single family, two story wood frame house with a basement constructed circa 1951. The exterior has aluminum siding.
2. The workers must be properly trained and licensed to perform the lead abatement work. A licensed lead abatement contractor must be utilized in performing the required work.
3. All required lead paint abatement work shall be conducted in compliance with HUD regulation 24 CFR Part 35.
4. Abatement 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 defective lead based painted surfaces shall be abated per this plan. Any remaining lead-based paint in an intact condition, including that which has been encapsulated or enclosed per this abatement plan, is to be included in an in-place management plan and periodically inspected for defective paint.

LOCATION	COMPONENT	CONDITION	REMEDICATION METHOD
<b>INTERIOR</b>			
R10-Basement	Interior and Exterior Sides of Cabinet Doors	Defective	Entire Cabinet System to be removed and disposed of in accordance with CTDEEP regulations. As described in Section 11 of this plan, under Waste Disposal, since the amount of the cabinet waste is below 10 cubic yards, if the homeowner agrees to take legal title to the waste, it can be disposed of as ordinary household waste.

**EXHIBIT 1**

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HOUSE FLOOR DIAGRAMS

Project Name: Windsor Carlton LSP

Address: 1037 N. Worthy St. Windsor, CT

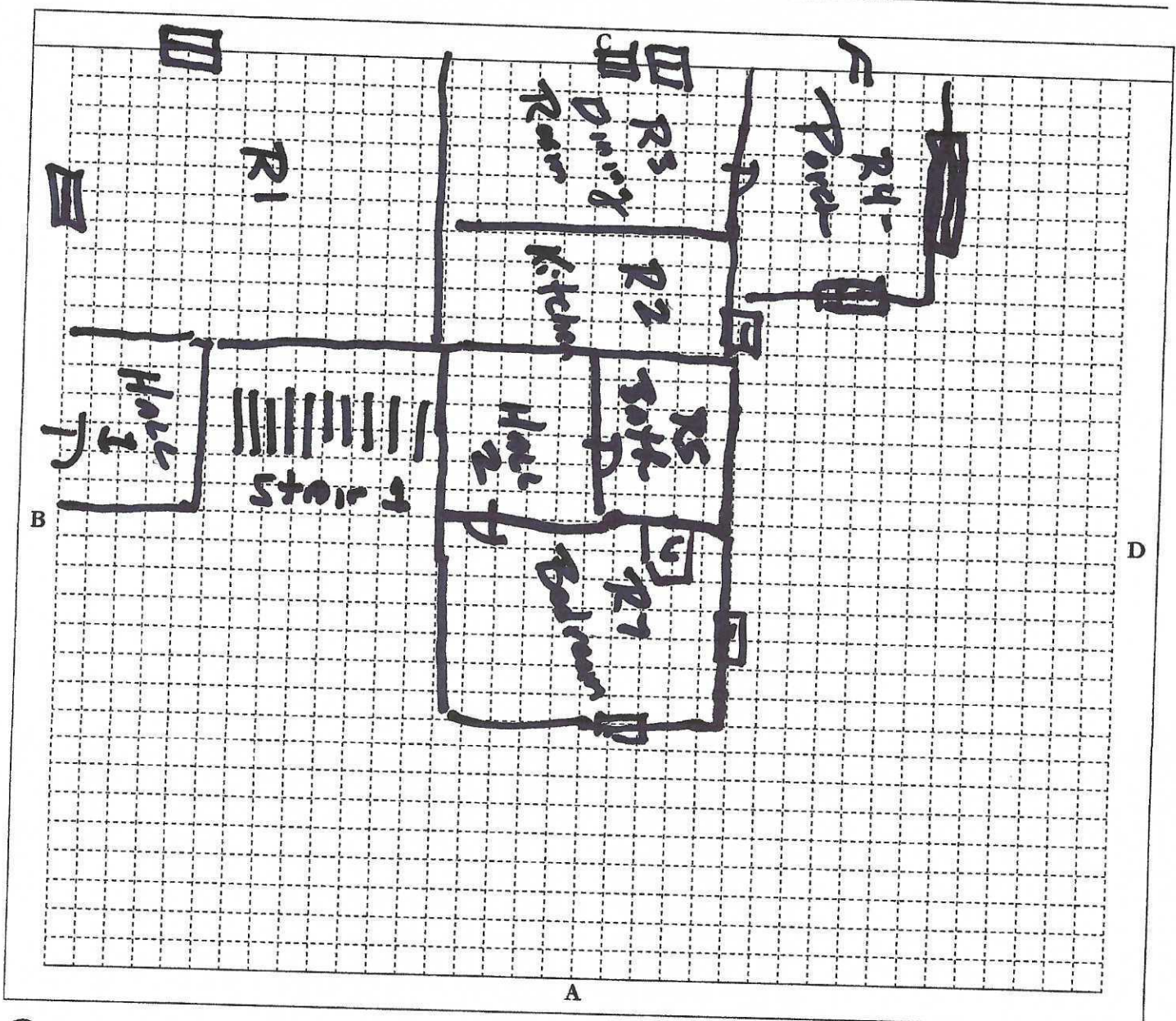
Project Number: 2020-152-4

Floor: 1 Room: \_\_\_\_\_

Apt. #/Bldg #: \_\_\_\_\_

Number of Doors: \_\_\_\_\_ No. of Windows: \_\_\_\_\_

Diagram of: First Floor



Ⓝ Room Number

⌋ Door

▬ Window

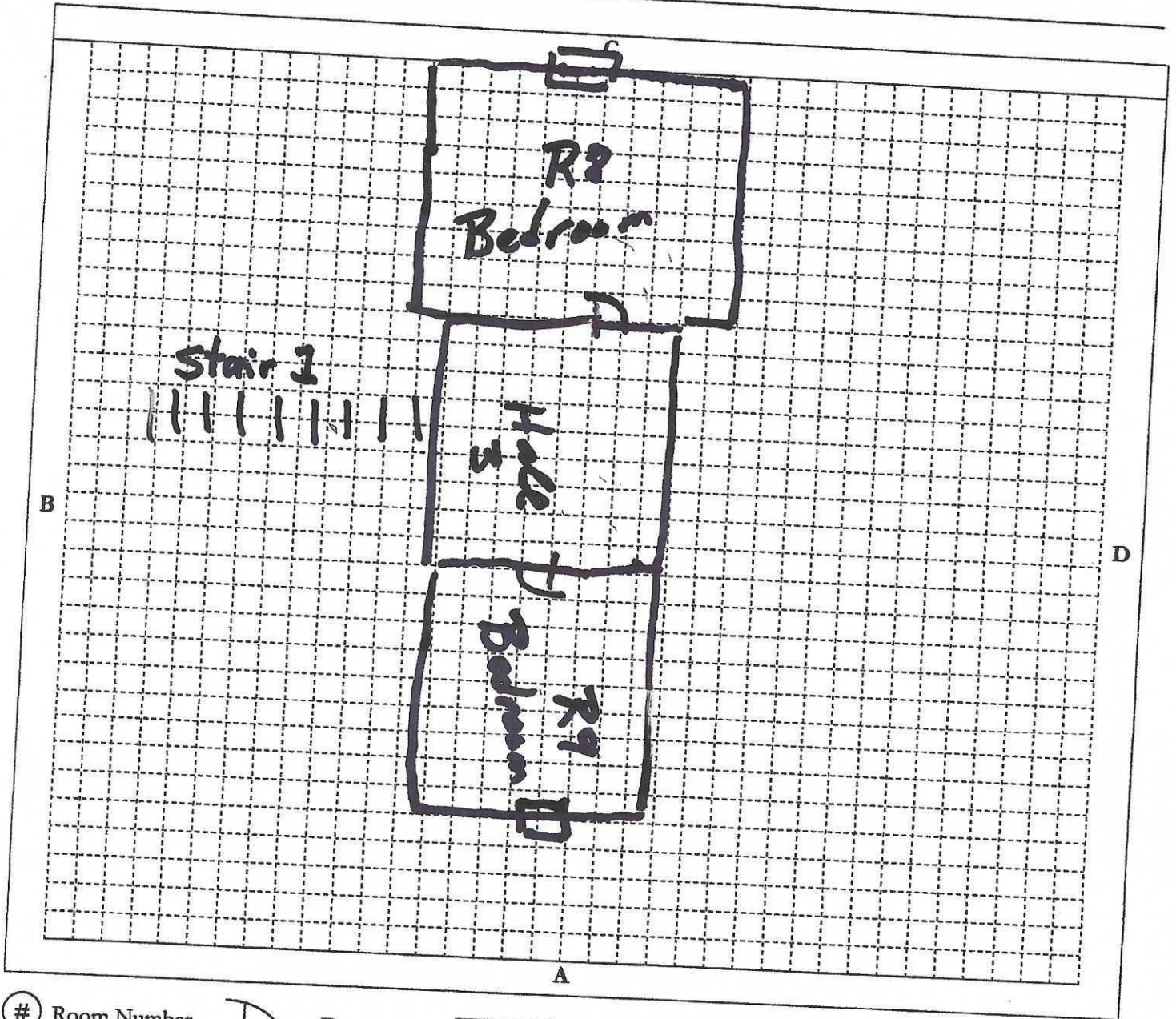
C = closet

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Project Name: Windsor Carlton LSP  
Address: 1037 N. Westly St. Windsor, CT  
Floor: 2 Room: \_\_\_\_\_

Project Number: 2020-152-4  
Apt. #/Bldg #: \_\_\_\_\_  
Page \_\_\_\_\_ of \_\_\_\_\_

Number of Doors: \_\_\_\_\_ No. of Windows: \_\_\_\_\_  
Diagram of: Floor 2

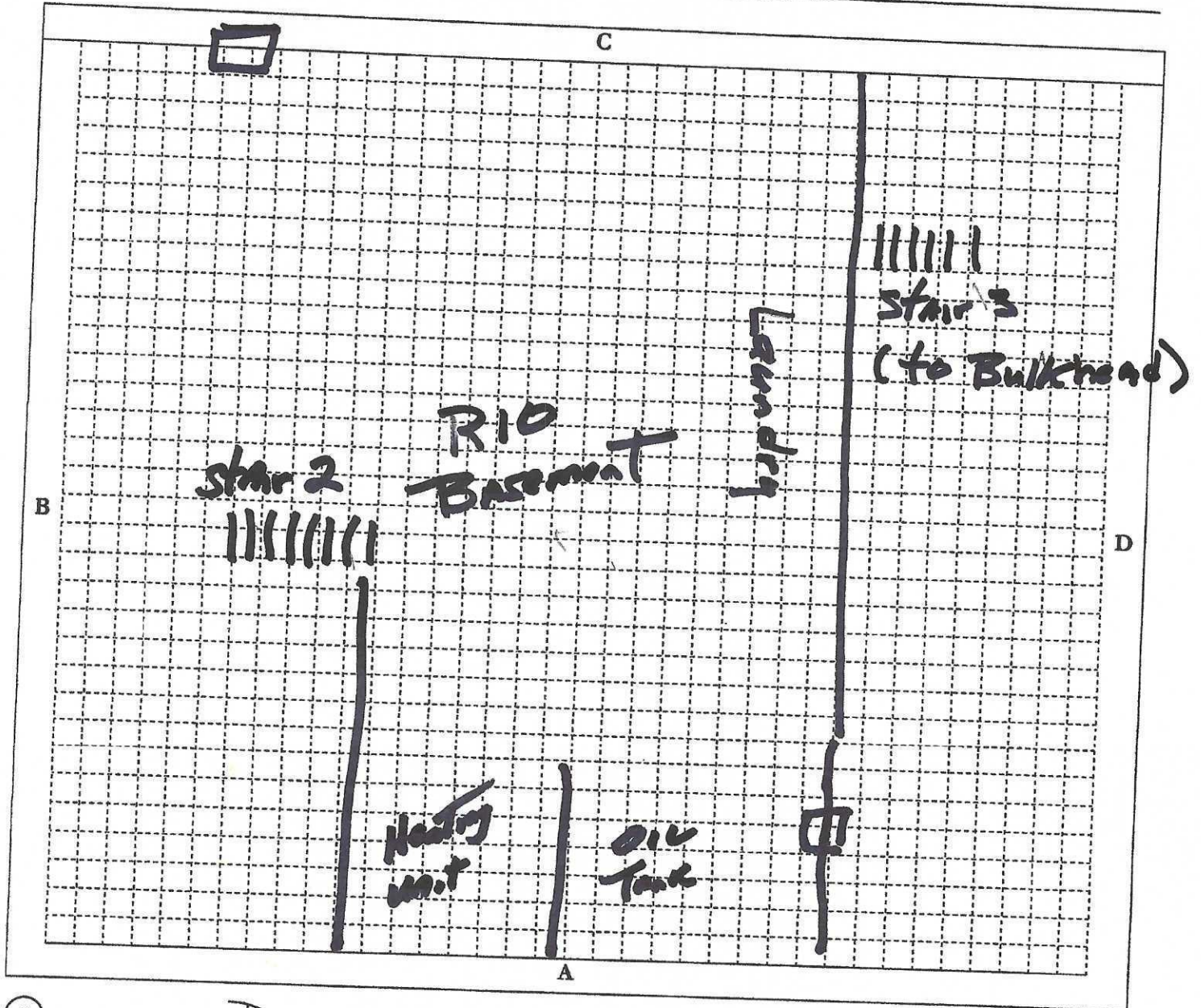


① Room Number    Door    Window



Project Name: Windsor Carlton LBP  
Address: 1037 N. Worthy St. Windsor, CT  
Floor: Basement Room: \_\_\_\_\_  
Number of Doors: \_\_\_\_\_ No. of Windows: \_\_\_\_\_  
Diagram of: Basement

Project Number: 2020-152-4  
Apt. #/Bldg #: \_\_\_\_\_  
Page \_\_\_\_\_ of \_\_\_\_\_



Ⓝ Room Number     Door     Window

Page \_\_\_\_\_ of \_\_\_\_\_