

# LEAD-BASED PAINT DISTURBANCE REQUIREMENTS



**Former YMCA Building  
480 South 3<sup>rd</sup> Street  
Clinton, Iowa 52732**

**Prepared For:**

**City of Clinton  
611 South 3<sup>rd</sup> Street  
Clinton, Iowa 52732**

**East Central Intergovernmental Association  
7600 Commerce Park  
Dubuque, Iowa 52002**

**Prepared By:**



**8951 Windsor Parkway  
Johnston, IA 50131**

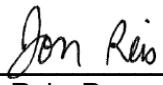
**August 19, 2024**

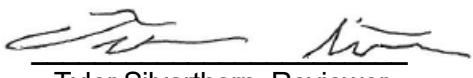
## CERTIFICATIONS PAGE

### LEAD-BASED PAINT DISTURBANCE REQUIREMENTS

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480 South 3<sup>rd</sup> Street  
Clinton, Iowa 52733

Prepared By:

  
\_\_\_\_\_  
Jon Reis, Preparer  
State of Iowa Lead Inspector/Risk Assessor  
Certification Number: LEAD-INSP10006  
Expiration Date: September 29, 2026

  
\_\_\_\_\_  
Tyler Silverthorn, Reviewer  
State of Iowa Lead Inspector/Risk Assessor  
Certification Number: LEAD-INSP10031  
Expiration Date: September 18, 2026

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## 1.0 BACKGROUND

### 1.1 Introduction

The purpose of this document is to ensure surfaces painted with lead-based paint (LBP) at the property listed are managed appropriately. Work resulting in disturbance of lead-based paint (LBP) must be completed abiding by all applicable local, state, and federal regulations, laws, or standards. LBP disturbance will require specific adherence to worker protection standards. This LBP Disturbance Requirements document details the standards that need to be followed based on the end result of any proposed redevelopment and purpose for LBP disturbance.

### 1.2 Project Summary

In the absence of a thorough Lead Inspection to document the location of LBP at the property, all painted surfaces in Building A (see Structure Identification Map in Appendix A) disturbed by asbestos abatement activities will be treated as LBP. Proposed redevelopment of Building A includes residential on the 2<sup>nd</sup> and 3<sup>rd</sup> floors. The property is eligible for listing in the National Register of Historic Places and federal funds are being used for the project. Therefore, the Iowa State Historic Preservation Office must review the project under Section 106 of the National Historic Preservation Act and approve proposed work including abatement of materials containing asbestos.

## 2.0 LBP DISTURBANCE

### 2.1 Regulations

29 CFR 1926 Safety and Health Regulations for the Construction Industry

40 CFR 260 Hazardous Waste Management System: General

40 CFR 261 Identification and Listing of Hazardous Waste

40 CFR 262 Standards Applicable to Generators of Hazardous Waste

40 CFR 263 Standards Applicable to Transporters of Hazardous Waste

40 CFR 264 Standards for Owners and Operators of Hazardous Waste Treatment, Storage, and Disposal Facilities

40 CFR 265 Interim Status Standards for Owners and Operators of Hazardous Waste Treatment, Storage, and Disposal Facilities

40 CFR 745 Lead-Based Paint Poisoning in Certain Residential Structures

IAC 641 – Chapter 69 Renovation, Remodeling, and Repainting – Lead Hazard Notification Process

IAC 641 – Chapter 70 Lead-Based Paint Activities

### 2.2 Certifications

If the end result of an area within the structure will be residential, the contractor, and/or firm disturbing LBP, must follow certification requirements listed in Iowa Administrative Code (IAC) 641 – Chapter 70. The firm selected must be an Iowa Lead Firm. The residential area includes any common areas that are used to access the residential portion of the building such as entryways, hallways, and stairways. Common areas associated with residential uses can also include, but are not limited to laundry rooms, day rooms, and/or lounge areas.

If the residential areas are to be renovated, the firm must have an Iowa Licensed Lead Safe Renovator assigned to the project. All unlicensed workers, unless specified by the funding source to also have a Lead Safe Renovator license, will be trained on the job in lead-safe work practices.

Unless otherwise required by the funding source, areas of the building that will not be residential as an end result, IAC 641 – Chapter 70 does not apply. Therefore, renovations that disturb LBP in non-

residential areas, and/or their associated common areas, is not required to be conducted by an Iowa Licensed Lead Firm, Lead Safe Renovator, Lead Abatement Contractor, and/or Lead Abatement Workers. All other OSHA and Hazardous Waste Regulation apply.

### **2.3 Pre-Renovation Notification**

If residential areas will be renovated, a standard notification must be provided to the owner and/or occupants in accordance with IAC 641 – Chapter 69.

### **2.4 OSHA 29 CFR 1926.62**

All aspects of OSHA's Lead in Construction Standard are applicable during the project. This includes but is not limited to medical surveillance, training, exposure monitoring, respiratory protection, personal protective equipment (PPE), safe work practices, hygiene facilities, containment, signage, hazard communication, and record keeping.

### **2.5 Competent Person**

The contractor must have a person on-site that meets the requirements of a competent person for 29 Code of Federal Regulations (CFR) 1926.62 and IAC 641 – Chapters 69 and 70.

### **2.6 Signage**

In accordance with 29 CFR 1926.62, warning signs must be posted and visible from all angles of approach to the work area. Warning signs must state:

DANGER  
LEAD WORK AREA  
MAY DAMAGE FERTILITY OR THE UNBORN CHILD  
CAUSES DAMAGE TO THE CENTRAL NERVOUS SYSTEM  
DO NOT EAT, DRINK OR SMOKE IN THIS AREA

If work clothing or equipment are to be cleaned off-site, containers used to transport must be labeled with the following:

DANGER: CLOTHING AND EQUIPMENT CONTAMINATED WITH LEAD. MAY  
DAMAGE FERTILITY OR THE UNBORN CHILD. CAUSES DAMAGE TO THE  
CENTRAL NERVOUS SYSTEM. DO NOT EAT, DRINK OR SMOKE WHEN  
HANDLING. DO NOT REMOVE DUST BY BLOWING OR SHAKING. DISPOSE OF  
LEAD CONTAMINATED WASH WATER IN ACCORDANCE WITH APPLICABLE  
LOCAL, STATE, OR FEDERAL REGULATIONS.

### **2.7 Containment**

The use of containment during the disturbance of LBP is required during renovation activities in residential and non-residential areas of the structure. Containment must be adequate to contain paint chips, dust, and debris from contaminating locations that are outside of the work area.

### **2.8 Cleaning**

Daily cleaning must be completed to prevent the spread of dust and debris throughout the work area. The accumulation of paint chips and dust must be kept to a minimum and will be removed at the end of each work shift. Work areas will be HEPA vacuumed and wet cleaned daily. No dry sweeping or use of compressed air is allowed.

## **2.9 Waste Removal and Disposal**

All discarded materials and construction debris shall be removed from the job site in a timely manner. Lead wastes must be wrapped and/or bagged and sealed prior to removal and contained to prevent release of dust and debris before the waste is removed from the work area for disposal. All lead waste, including dust, debris, paint chips, protective sheeting, HEPA filters, dirty water, cloths, mop heads, protective clothing, respirator cartridges, gloves, etc. shall be collected in heavy plastic sheeting or bags. The bags or sheeting shall be securely sealed.

As lead wastes will be removed along with the underlying components, characterization via Toxicity Characteristic Leaching Procedure (TCLP) is not needed for disposal of lead wastes.

## **2.10 Craftsmanship**

SHPO may determine specific components contribute to the historic nature of Building A and require the specific components remain. If workers damage one of these components while removing another, the damaged component should be repaired or replaced to match.

# **3.0 COMPLETION OF LEAD SAFE RENOVATION**

## **3.1 Post Renovation Cleaning Verification**

If the residential areas (including common areas) are renovated, the Lead Safe Renovator will complete the Post Renovation Cleaning Verification. The Post Renovation Cleaning Verification, including any additional cleaning due to failures, will be completed in accordance with IAC 641 – Chapter 70. A visual assessment will be completed by the Lead Safe Renovator. Photographic documentation must be completed to identify the conditions during the visual assessment. Upon a passing visual assessment, wipe sampling will be completed by the Lead Safe Renovator and compared to the cleaning verification card. Photographic documentation will be completed to document the wipe samples in relation to the card.

**APPENDIX A**

**Structure Identification Map**

## APPENDIX A - STRUCTURE IDENTIFICATION MAP



### Structure Identification Map

City of Clinton / ECIA

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Clinton, Iowa 52732

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