



STATE OF CONNECTICUT

DEPARTMENT OF PUBLIC HEALTH

DEH Circular Letter #2003-33

Date: October 28, 2003

To: Lead Abatement Contractors
Lead Consultant Contractors
Lead Training Providers

From: Alan J. Buzzetti, Supervising Environmental Sanitarian *agb*
Lead Environmental Management Unit
Division of Environmental Health

Re: Amended Lead Poisoning Prevention and Control Regulations

Enclosed is a copy of the recently amended Lead Poisoning Prevention and Control (LPPC) regulations Sections 19a-111-1 through 19a-111-11. The revised regulations were in effect and enforceable as of October 21, 2003. Below is a summary and discussion of the changes that were implemented (significant changes are highlighted in bold).

Change #1 – page 5

Section 19a-111-1 (59) "Toxic level of lead" means a level of lead that:

(A) when present in paint offered for sale for use on or in a residential dwelling contains greater than 0.06 percent lead by weight as measured by atomic absorption spectrophotometry (AAS), graphite furnace atomic absorption spectrophotometry (GFAAS), inductively coupled plasma-atomic emission spectrophotometry (ICP-AES) **or another accurate and precise testing method that has been approved by the commissioner**, by a laboratory approved by the department for lead analysis.

(B) when present in a dried paint, plaster or other accessible surface on or in a residential dwelling contains **equal to or greater than 0.50 percent lead by dry weight** as measured by atomic absorption spectrophotometry (AAS), graphite furnace atomic absorption spectrophotometry (GFAAS), inductively coupled plasma-atomic emission spectrophotometry (ICP-AES) **or another accurate and precise testing method that has been approved by the commissioner**, by a laboratory approved by the department for lead analysis, or **equal to or greater than 1.0 milligrams lead per square centimeter of surface** as measured on site by an X-ray fluorescence analyzer **or another accurate and precise testing method that has been approved by the commissioner**.



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Discussion: Toxic levels of lead in dried paint now include analytic results that are equal to (in addition to greater than) the threshold standards specified for paint chip and XRF methodologies. The commissioner may approve alternate testing methods that are shown to be accurate and precise in addition to those specified in the regulation.

Change #2 – page 6

Section 19a-111-2 (d)

When a child resides in a dwelling requiring lead abatement, interior dust, **drinking water** and exterior soil shall be assessed. **When soil or sand areas that are not covered by grass, sod, other live ground covers, wood chips, gravel, artificial turf, or similar covering are found to contain lead concentrations in excess of 400 parts per million, such bare soil or sand areas shall be abated. When lead dust hazards are found to be a source or a potential source of elevated blood lead in a child, lead dust shall be reduced to a safe level using appropriate cleaning methods. When lead in drinking water is determined to be a source or potential source of elevated blood lead in a child, appropriate remedial action approved by the local director of health shall be implemented.**

Discussion: A lead in soil standard for bare soil areas (400 parts per million) is specified in the regulation. When analytic results exceed this standard the bare soil area(s) shall be abated. When lead dust hazards are identified (see change #3 below) the dust hazard shall be reduced using appropriate cleaning methods. When it is determined that lead in drinking water may be a source or potential source of an EBLL in a child, remedial action that is approved by the director of health shall occur.

Change #3 – page 10

Section 19a-111-3 (j) (NOTE: This is an entirely new section)

Risk Assessment – For the purpose of assessing the level of risk from lead dust, a lead dust hazard is present when the concentration of lead in dust is equal to or exceeds the following.

(A) floors - 40 $\mu\text{g}/\text{sq. ft.}$ (micrograms per square foot);

(B) window sills – 250 $\mu\text{g}/\text{sq. ft.}$

Discussion: Establishes lead in dust standards to be used during risk and hazard assessment to determine whether a lead in dust hazard is present.

Change #4 – pages 12 and 13

Section 19a-111-4 (e)(2)

Samples of dust shall be collected at the following locations in each room or area where lead-based paint has been abated. Additionally, **if only a portion of a dwelling unit has been abated, a sample shall be collected from the floor outside the containment within ten (10) feet of the entrance to the abatement area upon completion of abatement activities.** Any samples collected under this section shall have lead in dust levels that are below the following clearance criteria for reoccupancy to be allowed:

- (A) **floors - 40 $\mu\text{g}/\text{sq. ft.}$** (micrograms per square foot);
- (B) **window sills - 250 $\mu\text{g}/\text{sq. ft.}$** ;
- (C) **window wells - 400 $\mu\text{g}/\text{sq. ft.}$**

Discussion: Establishes revised (reduced) lead in dust standards to be used for reoccupancy clearance subsequent to lead abatement. Requires that an additional lead in dust sample be collected for analysis from the floor outside the lead abatement area when abatement is limited to a portion of a dwelling unit.

Lead abatement and consultant contractors shall use these revised criteria immediately. Lead training providers shall immediately revise training curricula to reflect these amendments to the LPPC regulations.

Additionally, the revised regulations are posted at the DPH Lead Poisoning Prevention Program website at http://www.dph.state.ct.us/BRS/lead/lead_program.htm.

Should you have any questions regarding these amendments, please feel free to contact a staff member with the Lead Environmental Management Unit at (860) 509-7299.

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