

components coated by lead-based paint; removal of lead-contaminated dust; removal or covering of lead-contaminated soil with a durable covering (not grass, gravel, or sod, which are considered interim control measures); and preparation, cleanup, disposal, post-abatement clearance testing, recordkeeping, and monitoring (if applicable).

More than any other abatement method, on-site paint removal involves the greatest degree of disturbance and dust generation. Therefore, on-site removal of lead-based paint from a substrate should be carried out only if abatement rather than interim control is required and no other abatement method is feasible. For example, removal of paint from metal doorframes may be the only feasible abatement option, especially if the frames cannot be removed or enclosed and the paint cannot be stabilized. Paint removal may increase the level of lead in household dust and make effective cleaning more difficult. Even if dust clearance standards are met, any increase in leaded-dust levels over baseline levels means some increase in exposure. Furthermore, all paint removal methods leave behind some residues embedded in the substrate, which could continue to pose a hazard if the surface from which the paint is removed is later disturbed. Therefore, paint removal is the most invasive of abatement methods and should be avoided if possible.

Abatement also offers the greatest challenge to planning, since it is often performed in the context of other building construction work, while interim controls are more likely to be performed alone or as part of other maintenance work.

In fact, many forms of abatement require special construction skills in addition to protective measures and dust control techniques. For example, one of the most common forms of lead-based paint abatement is window replacement. Abatement contractors need to possess adequate carpentry skills to install (for example) new windows, as well as the demolition, dust containment, and cleaning skills held by abatement contractors. While providing some guidance, this chapter is not intended to impart carpentry, painting, resurfacing, and other construction knowledge required for most types of abatement. Abatement contractors should either subcontract this type of construction work or acquire the necessary construction skills before the job begins. Of course, all construction work must be performed in accordance with local code requirements and all abatement work must be done by certified firms and individuals.

Many forms of abatement can be integrated into construction work, which provides an opportunity to install systems that will have long-term impact. For example, whenever building components, such as doors and windows, are replaced, the *Guidelines* recommend that they be replaced with products that are more energy efficient. This will help reduce energy consumption and increase cost efficiency.

EPA has established standard training curricula and regulations for the training and certification of all individuals engaged in lead-based paint risk assessment, inspection, and abatement, and minimum performance standards for the purpose of certifying individuals who supervise lead abatement projects and conduct clearance examinations. EPA's regulations are generally implemented through State, Tribal, or territorial programs. All abatement contractors and firms must be certified to perform this type of work, and all abatement workers and supervisors must be trained and certified. Certification of abatement contractors and completion of clearance examinations by independent, certified risk assessors, lead-based paint inspectors or sampling technicians, ensures that abatement work is conducted properly and safely.

For exterior work, as an optional quality control procedure, consider collecting pre-abatement soil samples, which may not be analyzed until post-abatement soil samples have been collected,