

To: Wx Subgrantees
From: Community Programs
Release Date: June 16, 2025
Effective Date: June 16, 2025
Subject: Revised LSWP Guidance

Program Guidance: WAP-2025-02

BACKGROUND

IHCDA is changing its Lead Safe Work Policy (LSWP) to reflect the policy in place by the DOE/EPA without extra restrictions specific to IHCDA.

The IHCDA Policy Handbook Section 4.7 that is being revised currently says the following:
"In addition to DOE, EPA, and SWS requirements, IHCDA no longer allows the subrecipients to *assume* the presence of lead-based paint. IHCDA addresses *de minimus* surface area through the "We Care About Lead" policy as follows:

- Conduct set up to prevent lead dust from contaminating the work area.
- Wet/moisten the surface area being disturbed.
- Limit access to the area where paint is being disturbed.
- Ensure that all appropriate personal protective equipment is utilized.
- Conduct necessary work.
- Ensure proper disposal of trash and material is removed from the job site.
- Provide photo of proof of using wet methods and appropriate set up."

NEW GUIDANCE

Going forward, IHCDA will follow the guidelines outlined in [24 CFR § 35.1350](#).

§ 35.1350 Safe work practices.

(a) **Prohibited methods.** Methods of paint removal listed in [§ 35.140](#) shall not be used.

(b) **Occupant protection and worksite preparation.** Occupants and their belongings shall be protected, and the worksite prepared, in accordance with [§ 35.1345](#). A person performing this work shall be trained on hazards and either be supervised or have completed successfully one of the specified courses, in accordance with [§ 35.1330\(a\)\(4\)](#).

(c) **Specialized cleaning.** After hazard reduction activities have been completed, the worksite shall be cleaned using cleaning methods, products, and devices that are successful in cleaning up dust-lead hazards, such as a HEPA vacuum or other method of equivalent efficacy, and lead-specific detergents or equivalent.

(d) **De minimis levels.** Safe work practices are not required when maintenance or hazard reduction activities do not disturb painted surfaces that total more than:

- (1) 20 square feet (2 square meters) on exterior surfaces;
- (2) 2 square feet (0.2 square meters) in any one interior room or space; or
- (3) 10 percent of the total surface area on an interior or exterior type of component with a small surface area. Examples include window sills, baseboards, and trim.



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