

1. LEAD-BASED PAINT

1.1 PURPOSE

To effectively reduce lead exposures, Contractors need to be informed of their responsibilities under the University's Lead program and to provide contractors with guidelines who may potentially impact lead-based paint on NSU campuses.

1.2 GENERAL

Lead is a potent neurotoxin and carcinogen that causes reproductive toxicity and is regulated by federal and state agencies. Lead paint was used extensively before 1978 both on indoor and outdoor applications. Although lead-based paint materials may not present any health hazards while intact, any impact created by demolition, renovations or repair projects may present significant health hazards from the fumes or lead dust. Unless a lead paint inspection has been performed as part of the overall project, all painted surfaces should be treated as though they contain lead.

In the construction industry, most overexposures to lead are found in trades such as demolition, welding and painting.

1.3 RESPONSIBILITIES

For projects that involve the disturbance of paint, the EH&S office will contract with an appropriate consultant to determine if lead is present in the affected areas. The results of the lead paint survey will be made available to the Contractor prior to start of the contracted project.

Contractors before starting any projects of repair, renovation or construction that may impact lead-based paint, the following responsibilities are to be followed:

- 1) Contractors shall not perform any work on potentially lead-containing painted surfaces that creates dust or fumes (drilling, hot work, sanding, etc.) unless they are specifically trained and licensed to perform the work.
- 2) Ensure all work is compliant with all regulations as cited below.
- 3) If the Contractor's employees discover any loose or flaking painted areas during the course of the project, they are to report their findings immediately to the EH&S office.
- 4) Critical barriers shall be erected at all access points between occupied areas of the building and the Contractor's work area where potential lead dust/fumes can be generated. Such barriers may include using plastic sheeting to isolate the work area.
- 5) Contractors shall utilize engineering controls such as HEPA-shrouded tools to maintain low dust levels when working with lead painted surfaces.

1.4 REGULATIONS

OSHA regulation for lead is found in "Lead Exposure in General Industry" (29 CFR 1910.1025) and "Lead Exposure in Construction" (29 CFR 1926.62).

OSHA 29 CFR 1926.103 – General Industry Respiratory Standard

EPA 40 CFR 261.24 – Identification and listing of Hazardous Waste - Toxicity

EPA 40 CFR 745 - Lead-based Paint Poisoning Prevention in Certain Residential Structures

Another good resource is the U.S Department of Housing & Urban Development (HUD)

Title 10 requirements for the notification, evaluation, and reduction of lead-based paint hazards.

1.5 ACCOUNTABILITY

- All contactors will be responsible for complying with the guidelines as described above. Contractors are to communicate to their employees and Subcontractors all the guidelines and relevant information. All work shall be performed in accordance with University policies and procedures as well as all applicable laws and regulations.