Paint Debris Management

Lead was a common component in paints for many years. In 1973, the Consumer Product Safety Commission established a maximum lead content in paint of 0.5% by weight; in 1978, it was lowered to 0.05%. Most scientific literature assumes buildings painted prior to 1978 contain Lead-Based Paint (LBP). LBP was banned in residences in 1979; schools and businesses in 1993.

Given that exposure to lead or contaminated dusts can be potentially hazardous, EHS has developed the following guidelines, which are applicable to painting, finishing, renovation and demolition activities conducted by University employees, including non-University locations. University personnel and contractors who conduct these activities in University facilities will also be expected to comply with these and other procedures as determined by Environmental Health and Safety (EHS) on a case-by-case basis.

Authority
The management of lead and other heavy metals is mainly regulated under Cal/OSHA: CCR Title 8 [http://www.dir.ca.gov/title8/1532_1.html](http://www.dir.ca.gov/title8/1532_1.html)

Scope
All building surfaces painted before January 1, 1993 shall be assumed to contain lead-based paint (LBP), even if only a single layer (of many) contains lead.

Definitions
**Lead-based Paint** - is a surface coating containing by weight more than 0.5% lead. Before sampling assume that paint applied before January 1, 1993 is lead-based.

**Lead-contaminated Dust** - contains at least the following amounts of lead for each building component: 40 μg/ft² on interior floor surfaces, 250 μg/ft² on interior window surfaces, and 800 μg/ft² on exterior floor and window surfaces.

Accountability
**Facilities Management** will ensure that all lead-related construction debris disposal is performed in accordance with current guidelines.

**Environmental Health and Safety** will monitor lead-related construction projects creating LBP debris and provide consultation as necessary.

Waste Handling
1. All paint, sawing and demolition waste that cannot be easily picked up by hand shall be collected by those generating the waste. This includes paint chips, dust, debris and HEPA vacuum contents.
2. If initial analysis establishes that it is free of heavy metals, continuous collection and testing may not be required and dust/debris may be placed in the municipal
waste. This will be decided by EHS on a case-by-case basis based on the scope of the work and the method of removal.

3. All waste found to contain lead, cadmium or chromium levels above allowable concentration(s) by EHS must be disposed as hazardous waste. EHS can provide waste containers and disposal. Wastes that contain heavy metal concentrations below the allowable TCLP levels shall be disposed of as demolition or construction waste, unless it qualifies as hazardous waste for other characteristics.

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