

Will your projects involve buildings built before 1978?

Pre-1978 buildings may have lead-based paint, and you could put yourself and others at risk of poisoning from this dangerous toxin. Protect your customers, your workers and yourself by using lead-safe work practices and complying with state and federal lead safety laws.

Here's what you need to know:

Assume paint is lead-based.

If you are working in a pre-1978 building, assume that all paints and coatings are lead-based unless a Vermont-licensed lead inspector has inspected the property and found otherwise by use of an X-ray fluorescence (XRF) analyzer or the submittal of paint chips for laboratory analysis. Vermont law does not recognize the use of swab test kits for paint testing. Lead-based paint is also commonly found on structural steel beams or other building systems and material coatings in post-1977 commercial/ industrial buildings.

Always use lead-safe work practices and avoid prohibited practices.

Use lead-safe work practices in all pre-1978 buildings.

Lead-Safe Work Practices

- Limit unauthorized access to the work area.
- Enclose the work area with plastic sheeting or other effective lead dust barrier.
- Wear protective clothing.
- Mist painted surfaces before disturbing paint.
- Use manual surface preparation methods – do not use work practices that could generate dust.
- Follow good hygiene practices before leaving the work area to ensure that lead remains in the work area, and is not transported to break areas, public spaces, vehicles or home.
- Use housekeeping and cleanup procedures that will leave the work area in a condition that is safe for re-occupancy.

Prohibited Work Practices

- dry scraping
- use of chemical strippers, particularly those containing methylene chloride
- open flame burning or torching
- heat guns operated above 1100° F
- dry sweeping lead contaminated areas or surfaces.

Certain work requires a lead abatement permit, and must be conducted by a Vermont-licensed Lead Abatement Contractor.

Activities where lead-based paint is present are only authorized under a Lead Abatement Permit and must be conducted by a Vermont-licensed Lead Abatement Contractor, using control methods and work practices approved by the Vermont Department of Health. Activities only authorized by permit:

- use of sanding machines and other mechanical abrasive methods
- hydro-blasting (including high-pressure washing)
- chemical stripping
- full removal of lead-based paint from a component (also known as de-leading)

Comply with state and federal lead laws.

Vermont's Essential Maintenance Practices (EMP) Law:

- applies to residential rental buildings and daycare facilities
- applies when disturbing one (1) square foot or more of lead-based paint
- requires the use of lead-safe work practices and prohibits unsafe work practices
- requires that the person performing the work, or an on-site supervisor, has an Essential Maintenance Practices (EMP) Certificate from the Vermont Department of Health

Environmental Protection Agency (EPA) Lead Renovation, Repair, and Painting (RRP) Rule:

- applies to projects in a residential building, daycare facility, kindergarten, or other place frequented by children under age 6
- applies when the total amount of lead-based paint to be disturbed exceeds either 6 square feet (per interior room) or 20 square feet (per exterior surface)
- requires the use of lead-safe work practices and prohibits unsafe work practices
- requires that the contractor be an EPA-certified Lead Safe Firm and have at least one EPA-certified renovator who is supervising job site activities. EPA certification is obtained by taking the RRP course (8 hours)
- requires compliance with all the notification and recordkeeping requirements set forth in the RRP Rule

VOSHA Lead in Construction Standard:

- applies when you have employees
- aims to protect workers from exposure to lead
- Find out more at: <http://www.osha.gov/Publications/osh3142.pdf>.

FOR MORE INFORMATION –

Vermont Department of Health • Asbestos and Lead Regulatory Program • TEL 800-439-8550
Lead Resource Guide: http://healthvermont.gov/enviro/lead/lead_contractor.aspx

Environmental Protection Agency • RRP website:

<http://www.epa.gov/region1/enforcement/leadpaint/index.html>