



CONSTRUCTION ENVIRONMENTAL HEALTH & SAFETY EXHIBIT

LEAD-BASED PAINT

I. General Requirements

- A. All Contractors and Subcontractors performing work on projects conducted at or on behalf of the University shall comply with all applicable federal environmental regulations (EPA, OSHA, etc.), state environmental regulations (MassDEP, Department of Public Health, Massachusetts Water Resources Authority, etc.), and local environmental regulations and ordinances (as appropriate) as well as the University-specific guidelines outlined in the following Sub-Sections.
- B. The requirements included in the following Sub-Sections have been developed to aid Contractors and Subcontractors in navigating through relevant environmental regulations and potential environmental issues that may arise over the course of construction, therefore helping to minimize the overall impacts to the environment and to students, faculty, staff, and the general public. Where codes/regulations/requirements conflict, the more stringent guidelines shall apply.
- C. The Contractor shall be in compliance with 29 CFR 1926.62 OSHA Lead in Construction Standard including initial determination of potential exposure, personal protection, medical monitoring and training, 105 CMR 460, the “Massachusetts Lead Law” when lead paint is to be removed or covered in residences built before 1978 and the USEPA’ Lead Renovation, Repair and Painting Rule (RRP Rule) for work in homes, child care facilities and pre-schools built before 1978.

II. Painted Surfaces

- A. Unless the HUPM and HUEHS provide a specific lead-paint inspection, the Contractor shall assume that any painted surface they come in contact with is coated with lead-based paint, except where the paint was installed by the Contractor as part of the work and the paint is known not to contain any level of lead.
- B. The Contractor should not perform any intrusive, dust-generating work (e.g., drilling, cutting, sanding, brazing, scraping, demolition) on painted surfaces unless the surface has been confirmed to be non-lead or unless such work is part of the contracted work and the firm is specifically trained to do so.
- C. Any painted surfaces that have loose, flaking, chipping, or otherwise non-intact paint should not be impacted by the Contractor (unless confirmed to be non-lead based) and should be reported to the HUPM and HUEHS immediately.

III. Exposure Monitoring

- A. Each contractor shall develop and implement a project/task site specific lead exposure management procedure prior to the start of activities to reduce exposure to or below the permissible limits if exposure is possible.
- B. The procedure shall include engineering controls, work practices, PPE, documentation of air sampling, including sources of lead, description of each lead related task which lead is emitted should be outlined and all employees shall be trained prior to work beginning.
- C. Permissible Exposure Limits
 - 1. Per OSHA regulation, employees shall not be exposed to greater than 50 micrograms per cubic meter of air, time weighted average, during an 8-hour workday.
 - 2. If an employee is exposed to lead above the PEL for 30 or more days in a year, employees will be included in a medical surveillance program which is performed by or under the supervision of a licensed physician.
- D. Medical Surveillance



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1. A baseline blood sample shall be obtained prior to any lead exposure
2. Employees will be removed from exposure to lead when an exposure meets or exceeds the Action Level on each occasion and follow-up blood sampling test indicates blood level is at or above 50 ug/100gram of whole blood.