

TOOLBOX TALK: LEAD PAINT IN RENOVATION

Job or site _____

Date _____

Led by _____

Open with this

How old is this house? If the answer is before 1978 or you do not know, we are working lead safe today, and that starts before the first piece of trim comes off.

The talk

Lead paint was in use in American housing until it was banned for residential use in 1978. The older the house, the more likely it is and the higher the concentration. The hazard is almost never the intact paint. It is the dust and chips made when it is disturbed.

Two sets of rules apply at once. OSHA 1926.62 protects the worker, with exposure limits, monitoring and hygiene requirements. The EPA Renovation, Repair and Painting rule protects the occupants, and it applies to work for compensation in pre 1978 housing and child occupied facilities where you disturb more than six square feet of interior paint, twenty square feet of exterior, or replace a window.

Under RRP, the firm has to be EPA certified, the work has to be supervised by a certified renovator, the occupants have to get the lead pamphlet, and the records have to be kept. Fines for doing it without that are not small.

Three methods are prohibited outright: open flame burning or torching, machine sanding or grinding without HEPA exhaust control, and heat guns above eleven hundred degrees Fahrenheit. Dry scraping and dry sanding are how most of the dust gets made, so wet methods and HEPA attachments are the working answer.

Containment. Plastic on the floor extending out from the work, doors and vents sealed, no occupants in the area, signs up, and the plastic folded inward and disposed of properly at the end. Everything that comes out of the room comes out through that containment.

Hygiene is the part that goes home with you. No eating, drinking or smoking in the work area, wash hands and face before breaks and before leaving, change out of work clothes, and do not take dusty clothes home to be washed with the family laundry. Children in the house of a remodeler have been poisoned this way.

And cleanup. HEPA vacuum, wet wipe, HEPA vacuum again. A shop vac without a HEPA filter blows lead dust straight back into the room, in a finer form than it started.

Point at these before anybody starts

- The age of this building, and whether a lead test has been done
- The containment: plastic, sealed doors and vents, and the signs
- The tools: HEPA shrouds, wet methods, and nothing that burns or dry sands
- The hand wash station, and where people are eating and drinking
- The waste bags, and how the plastic is coming out at the end
- Who here has small children at home, because the clothing rule matters most to them

The rules that apply

- Treat paint in pre 1978 housing as lead containing unless testing shows otherwise.
- RRP applies to work for compensation disturbing more than 6 square feet interior, 20 square feet exterior, or any window replacement in pre 1978 target housing.
- Prohibited: open flame burning, machine sanding or grinding without HEPA control, and heat guns above 1100 degrees Fahrenheit.
- Contain the work area with plastic, seal doors and vents, keep occupants out and post warning signs.
- Wash hands and face before eating, drinking, smoking or leaving. Change clothes and never take work clothing home to wash with family laundry.
- Clean with HEPA vacuum and wet methods only. A standard shop vac makes it worse.

Ask the crew

- Has this house been tested, and if not, why are we treating it as anything other than lead?
- Where is the hand wash station and where are people eating lunch today?
- Who has young kids at home and is changing clothes before they get in the truck?

Close with this

Pre 1978 means lead safe work. Contain it, wet it, HEPA it, and wash before you eat or drive home.

Attendance

Everybody who was present signs, including subcontractors and anybody visiting the site.

	Print name and signature
	Print name and signature
	Print name and signature
	Print name and signature
	Print name and signature
	Print name and signature
	Print name and signature
	Print name and signature
	Print name and signature
	Print name and signature
	Print name and signature
	Print name and signature

This talk is general safety information for a crew briefing, not legal advice and not a substitute for the training your employees are required to have. Standards are quoted for orientation only. Check the current text of the standard and your own state plan, which may be stricter than the federal rule.