

Lead Compliance Plan for Construction Activities

Responsible Administrator: Industrial Hygiene

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1. Program Description

The purpose of this plan is to establish specific procedures to minimize occupational exposure to lead during construction activities. Proper lead management will safeguard the health and safety of workers and building occupants, minimize the impact to the environment, and ensure adherence to the various regulatory issues concerning lead in the work environment.

2. Scope

This plan applies to all occupational exposures to inorganic lead for affected UC employees and contractors during construction work activities in which lead-containing materials are present. Construction related activities where a worker may encounter and or/work with lead include: a) new construction; b) demolition or salvage of structures; c) removal or encapsulation of lead containing materials; d) alteration, repairs, and/or renovation of structures; e) installation of products containing lead; f) emergency clean-up; g) storage of lead containing materials at the work site; and h) maintenance operations.

Currently, UCI personnel are not trained or authorized to perform lead related work at or above the Action Level Limit. However, personnel engaged to perform operations and maintenance procedures and work practices are required to follow the elements of this section, as applicable, in addition to all applicable federal, state, and local regulations, standards, and codes governing lead management.

3. Definitions

Action Level (AL)- Employee exposure to airborne lead at an 8-hour time- weighted average concentration of 30 micrograms of lead per cubic meter ($\mu\text{g}/\text{m}^3$) of air or 0.030 milligrams per cubic meter (mg/m^3) of air, without regard to the use of respirators.

Permissible Exposure Level (PEL) - The allowable 8-hour time weighted average concentration of airborne lead the employee may be exposed to without regard to the use of respirators. This value is 50 $\mu\text{g}/\text{m}^3$ of lead in air or 0.050 mg/m^3 of lead in air.

Objective Data- Information from manufacturers or laboratory data that demonstrates that the use of a material in a specific operation or activity will not result in exposure to lead at the AL.

Regulated Area-Work areas where airborne exposure to lead is above the PEL.

4. Responsibilities

Industrial Hygienist- Responsibilities include but are not limited to: reviewing project-specific lead management work plans, inspecting work activities involving potential lead exposure, using lead identification/assessment techniques, and monitoring airborne lead exposures.

Lead Worker- Each lead worker must have basic knowledge of the hazards associated with lead. Each employee is responsible for wearing assigned personal protective equipment, following good personal hygiene practices, and adhering to all work practices established for each specific job.

Construction Project Manager or Site Supervisor- Each project manager or supervisor will be responsible for consulting with the UCI EHS Industrial Hygienist to evaluate the presence of lead-containing materials, controlling access to regulated areas, and ensuring that all work practices established for a specific job are adhered to by the workers.

Contractor- Each contractor associated with work involving lead-containing materials are required to follow by the UC Environmental Health and Safety Department established guidelines.

5. Program Components

a. EXPOSURE ASSESSMENT

i. LEAD IDENTIFICATION BULK SAMPLES

1. Suspect lead-containing materials are evaluated prior to the start of work. Lead analysis must be performed for each unique surface to be disturbed.
2. For non-residential buildings, a representative number of painted surface bulk samples should be collected. Two samples should be collected from each homogeneous surface from each type of paint/color. One sample may be collected from each type of door or window frame.
3. All samples shall be submitted to AIHA and ELLAP accredited lead laboratories for analysis.

ii. EXPOSURE MONITORING

1. Air monitoring is conducted under the direction of the University's Industrial Hygienist.
 - Air samples shall be collected in the breathing zone of employees where there is potential exposure to lead. Sampling shall be conducted in accordance with NIOSH Method No. 7082. Where a determination has been made that lead containing surfaces or materials may be present at the work site, air monitoring shall be conducted periodically during construction activities that are representative of the exposure for each job classification at the work site to represent the initial exposure assessment.

iii. DETERMINATION OF SURFACE CONTAMINATION LEVELS

- To minimize the risk of contamination in eating areas and the workplace in general, housekeeping measures (HEPA vacuums, wet mopping, and as listed under Section VII, B), should be implemented to contain lead dust during any activity involving the disturbance of lead containing materials. To verify the effectiveness of housekeeping efforts, the presence of lead contamination on surfaces shall be conducted using NIOSH 9100 methods.

b. CONTROL MEASURES

i. PERSONAL PROTECTIVE EQUIPMENT

1. Personal Protective Equipment must be always worn where there may be potential exposure to lead containing materials including the initial exposure assessment phase. The minimum level of personal protective equipment shall be specified by the University's Industrial Hygienist.
2. The appropriate respiratory protection must be worn in accordance with [Appendix B - Respiratory Protection for Lead Aerosols](#)
3. Respirators must be worn:
 - As an interim protection for tasks until exposure assessments can be completed, refer to [Appendix A - Assumed Exposures for Construction Tasks*](#)
 - and B to determine the appropriate level of respiratory protection.
 - When an employee's exposure exceeds the Permissible Exposure Limit (PEL).
 - Whenever an employee requests for a respirator.
 - In work situations where engineering and work practice controls are not sufficient to reduce employee exposures below the PEL.
4. Coveralls contaminated with lead must not be worn outside of the regulated area.
5. Gloves should be worn if they do not interfere with the work being performed.
6. Eye protection meeting the ANSI Z87.1 standard must be worn during construction activities.

ii. ENGINEERING AND WORK PRACTICE CONTROLS

1. Provide HEPA filtered local exhaust ventilation for devices or abrasive power tools, needle guns sanders, grinders, and other equipment that will be used to disturb lead containing surfaces.
2. Use HEPA vacuums for cleanup. Do not dry sweep or use compressed air.
3. Use wet methods to reduce airborne dust generation, e.g., a water sprayer to hold down settled leaded dust on the plastic sheeting covering the floor.
4. Wet surfaces with water prior to scraping, sweeping, or sawing.
5. Daily cleanup of work area and equipment to prevent leaded dust accumulations.
6. No eating, drinking, smoking, or applying cosmetics where lead containing surfaces are being disturbed.
7. Shoveling, wet sweeping, brushing may only be used for clean- up to pick-up large debris. The debris should be misted with water prior to clean up to minimize leaded dust generation.
8. All surfaces must be kept as free as practicable from lead accumulations.
9. Possession or storage or consumption of foods, beverages, chewing gum, tobacco products, and cosmetic products is prohibited in the work area.
10. A Regulated Area shall be established around the work location. In the absence of project-specific exposure data, the Regulated Area shall be configured to include all areas within a 25-foot radius of these activities performed on structures with lead- containing coatings. The Regulated Areas shall be identified with warning signs posted at all approaches to the area such that personnel may read the signs and take necessary protective steps before entering the area marked by the signs. The signs shall read as follows:

**WARNING
LEAD WORK AREA POISON
NO SMOKING OR EATING**

11. A change area shall be established at the boundary of the Regulated Area for the purpose of entry and exit from the Regulated Area for any purpose except emergencies.
12. Employees entering the Regulated Area will be provided respiratory protection in accordance with [Appendix B - Respiratory Protection for Lead Aerosols](#)
13. Employees entering the Regulated Area will be provided with protective work clothing that prevents contamination of the employee's garments. This protective clothing shall be provided in a clean and dry condition at least weekly. Protective clothing shall include, as a minimum:
 - a. Coverall or similar full-body work clothing
 - b. Gloves
 - c. Eye protection
14. Employees exiting the Regulated Area for any purpose shall decontaminate their protective clothing by the following methods:
 - a. Removal of outer protective clothing
 - b. Use of a HEPA-filtered vacuum
15. Provisions shall be made in the change area for the collection of contaminated items such as work clothing, respirator cartridges, and equipment.
16. Provisions will be made for employees to wash their hands and face at the completion of the activity and/or before departing from work at the end of the shift. Also, provisions will be made to allow employees to wash their hands and face prior to eating, drinking, smoking, or applying cosmetics.
17. Shower facilities should be provided when deemed appropriate by the Industrial Hygienist. This decision shall be made upon consideration of project duration and location, climate, and availability of acceptable water supply.

iii. INITIAL MEDICAL SURVEILLANCE

Employees exposed on any day to airborne lead concentrations at or above 30 $\mu\text{g}/\text{m}^3$ will have the opportunity to receive a baseline blood lead level (BLL) examination. This examination shall include the BLL and the zinc protoporphyrin level. Medical examinations and information provided to examining and consulting physicians shall be in accordance with Cal/OSHA Standard Section 1532.1 and under the direction of an Occupational Physician designated by UC EHS. The following information shall be provided to the consulting physicians:

- a. Copy of Cal/OSHA's Lead in Construction Standard, Title 8 Section 1532.1, including all Appendices.
- b. Description of the affected employee's duties as they relate to the employee's exposure.
- c. Employee's exposure level or anticipated exposure level to lead and to any other toxic substance (if applicable).
- d. Description of any personal protective equipment used or to be used.
- e. Prior blood lead determinations.
- f. All prior written medical opinions concerning the employee in the employer's possession or control.

iv. MEDICAL CONSULTATION

Medical consultation will be made available at least annually to any employee under the following situations:

- a. The employee has a confirmed BLL of 40 $\mu\text{g}/\text{dL}$ or higher within the preceding 12 months.
- b. The employee exhibits signs or symptoms commonly associated with lead intoxication.
- c. The employee desires medical advice concerning the effects of current or past exposure to lead on the employee's ability to procreate a healthy child.

v. MULTIPLE PHYSICIAN REVIEW

UC will select the physician to conduct the initial medical examination, as listed under Title 8, Section 1532.1. The employee has the right to designate a second physician to review initial examination results after notification to the UC Worker's Compensation Office, and have a second examination conducted only after the initial medical examination has been completed. In the event the two physicians differ in their findings, a third-party physician will be agreed on by the two physicians to resolve prior disagreements.

vi. MEDICAL REMOVAL PROTECTION

Medical removal protection (MRP) involves the temporary removal of an employee from a worksite, due to elevated blood lead levels, to a place of significantly lower exposure without loss of earnings or seniority or other employment rights or benefits.

An employee is included in the MRP when:

- a. Worker's periodic and follow-up BLL are equal to 50 micrograms per deciliter ($\mu\text{g}/\text{dL}$). The employee can return to the worksite when two consecutive BLL are less than 40 ($\mu\text{g}/\text{dL}$).
- b. A final medical determination indicates a medical condition that places the employee at "increased risk of material impairment to health" due to lead exposure.
- c. An employee removed because of the physician's recommendation may be returned to former job status when the physician indicates it is safe to do so.

vii. RECORDKEEPING

Accurate records will be established and maintained for the following subjects. The record retention period will be in accordance with UC record retention guidelines. Affected employees, former employees, and their designated representatives can obtain access to the records mentioned above by providing a written request to the Occupational Health Nurse in the Environmental Health and Safety Office.

viii. EXPOSURE ASSESSMENT

All employee monitoring data will be retained for the period of employment plus 30 years. Exposure monitoring records shall include:

- a. Date(s), number, duration, location, and results of each of the samples taken if any, including a description of the sampling procedure used to determine representative employee exposure where applicable
- b.
- c. Description of the sampling and analytical methods used and evidence of their accuracy
- d. Type of respiratory protective devices worn, if any
- e. Name, social security number, and job classification of employee monitored and all other employees whose exposure the measurement is intended to represent
- f. Environmental variables that could affect the measurement of employee exposure

ix. MEDICAL SURVEILLANCE

Records will be maintained for employees subject to medical surveillance. Records will include at a minimum:

- Employee name
- Social security number
- Job description/duties
- Air monitoring data pertinent to the employee
- Any employee medical complaints
- Medical examination results including medical/work history
- Biological monitoring
- Any information or guidelines used to interpret laboratory tests.

Medical records appropriate to this section will be retained for a period of employment plus 30 years.

x. MEDICAL REMOVAL

Records will be maintained for employees removed from current job status due to elevated BLLs. Records will include at a minimum: employee name; social security number; date of removal and return to job status; explanation of how the removal was accomplished; and reason for removal. Records will be retained for at least the duration of the employee's employment.

xi. TRAINING

EHS Office will maintain training records on each employee trained under this Lead Compliance Program. Records will include: date of training; employee name; and a description or outline of training content.

Employee General Awareness

For each employee in a work environment where lead-containing materials are present, training will be conducted initially upon job assignment. Training will consist of, as a minimum, an overview of the hazards of lead; warning signs/labels; relevant information from an MSDS; and the contents of the Lead Compliance Program.

Lead Worker Training

In addition to general awareness training, each worker exposed to an airborne concentration of lead above the action level of 30 $\mu\text{g}/\text{m}^3$ (micrograms per cubic meter) shall receive at least annually information concerning:

1. Specific jobs that could result in an exposure above the action level
2. General respirator and use of personal protective equipment
3. Proper use of engineering controls and work practice controls
4. Medical surveillance/removal program
5. Use of chelating agents
6. Access to medical/exposure records/training materials
7. Content of Cal/OSHA's Lead in Construction Standard, Title 8 Section 1532.1.

xii. Respiratory Protection Training

All UC employees required to use a respirator must participate in the UC Respiratory Protection Program.

xiii. ENVIRONMENTAL MANAGEMENT

Environmental management (i.e., waste characterization, waste disposal) will be conducted under the direction of the Hazardous Waste Section of Environmental Health and Safety.

The "Guidance on Waste Management for Lead Abatement Activities" is in [Appendix E - Guidance on Waste Management for Lead Abatement Activities](#) of this document.

6. Reporting Requirements

All work shall be performed in strict accordance with all applicable federal, state, and local regulations, standards, and codes governing lead, and any other trade work done in conjunction with the disturbance of lead. The lead contractor generally makes notification to regulatory agencies. The Lead Program Coordinator facilitates notification to affected UCI personnel.

The most recent editions of any relevant regulation, standard, document, or code shall be in effect. Where conflict among the requirements or with these specifications exists, the most stringent requirements shall apply.

Any work involving disturbance of lead shall comply with the requirements of the California General Industry Safety and Health Standards, and the Safety and Health Regulations for Construction, Title 8, California Code of Regulations (CCR), including, but not limited to the following sections:

Section 5144:	Respiratory Protection
Section 2405.4:	Electrical
Section 1637, 1640, 1658:	Scaffolding
Section 1513:	Housekeeping
Section 5194:	Hazard Communication
Section 1675:	Ladders
Section 3215 and 3220:	Egress and Emergency Plans
Section 1514:	Personal Protective Equipment
Section 1519:	Sanitation
Section 3360:	
Sanitation	
Section 1684, 3555, and 3556:	Powered
Hand Tools Section 1502:	Contractors
Responsibilities	
Section 1511:	General
Safety and Health Provisions	
Section 1510	Safety Training and Education
Section 1527 and 3366:	Washing Facilities
Section 1528:	Gases, Vapors,
Fumes, Dusts, and Mists	
Section 1531 and 5143:	Ventilation
Section 3203:	Injury and
Illness Prevention Program	
Section 3204:	Access to
Employee's Exposure and Medical Records	
Section 6003:	Accident Prevention Signs
Section 3221:	Fire Prevention Plan
Section 1532.1:	Construction Safety Orders, Lead

Any work involving disturbance of lead shall comply with the Federal Environmental Protection Regulations pertaining to the handling and disposal of lead-containing materials, as well as the State of California and any local government agencies which have delegated responsibility for the administration and enforcement of federal regulations.

22 CCR, Section 66261
10 CFR, Part 261

The Contractor shall comply with all requirements of the EPA-approved landfill that is selected as the disposal site.

The contractor shall comply with California Title 17, Section 8.

7. References & Appendices

Lead Regulations- Title 8 CCR 1532.1; Title 29 CFR 1910.1025; Title 29 CFR 1926.62, 40 CFR part 745 (I), (B), Title 17 CCR Division 1 Chapter 8 Lead- Based Paint and Lead Hazards

The original of all documents pertaining to this Lead Compliance Plan will be kept on file at EHS. The standard documents to be kept on file will be:

Reports of Survey and Laboratory Analyses - Original

Records of Areas Removed/Abated Disposal Records

Verification

Summary of Lead Containing Materials on Campus - Consult with EHS for the most updated list.

[Appendix A - Assumed Exposures for Construction Tasks*](#)

[Appendix B - Respiratory Protection for Lead Aerosols](#)

[Appendix C - Exposure Control Strategy During Renovation/Painting/Sanding Operations Of Surfaces Containing 600 Ppm Lead Or Greater](#)

[Appendix D - Exposure Control Strategy During Demolition/Sanding/Painting of Surfaces Containing Less Than 600 Ppm Lead](#)

[Appendix E - Guidance on Waste Management for Lead Abatement Activities](#)

APPENDIX A

ASSUMED EXPOSURES FOR CONSTRUCTION TASKS*

50 $\mu\text{g}/\text{m}^3$ to 500 $\mu\text{g}/\text{m}^3$	500 $\mu\text{g}/\text{m}^3$ to 2500 $\mu\text{g}/\text{m}^3$	Greater than 2500 $\mu\text{g}/\text{m}^3$
<ul style="list-style-type: none"> • Manual demolition • Manual scraping • Manual sanding • Heat gun use • Power tool paint removal in the HEPA vacuum-assist dust collection system 	<ul style="list-style-type: none"> • Clean up on dry, abrasive blasting jobs • Abrasive blasting enclosure movement/removal 	<ul style="list-style-type: none"> • Abrasive blasting

*Title 8 CCR, Section 1532.1

APPENDIX B

RESPIRATORY PROTECTION FOR LEAD AEROSOLS

Airborne Concentration of Lead or Condition of Use	Required Respirator
Not in excess of 500 $\mu\text{g}/\text{m}^3$	<ul style="list-style-type: none"> • $\frac{1}{2}$ mask air purifying respirator with high efficiency filters • $\frac{1}{2}$ mask supplied air respirator operated in demand (negative pressure) mode
Not in excess of 1250 $\mu\text{g}/\text{m}^3$	<ul style="list-style-type: none"> • Loose fitting hood or helmet powered air purifying respirator with high efficiency filters • Hood or helmet supplied air respirator operated in a continuous- flow mode, e.g., type CE abrasive blasting respirator operated in a continuous-flow mode
Not in excess of 2500 $\mu\text{g}/\text{m}^3$	<ul style="list-style-type: none"> • Full facepiece air purifying respirator with high efficiency filters • Tight fitting powered air purifying respirator with high efficiency filters • Full facepiece supplied air respirator operated in a continuous- flow mode • $\frac{1}{2}$ mask of full facepiece supplied air respirator operated in demand mode • Full facepiece self-contained breathing apparatus (SCBA) operated in demand mode
Not in excess of 50,000 $\mu\text{g}/\text{m}^3$	<ul style="list-style-type: none"> • $\frac{1}{2}$ mask supplied air respirator operated in pressure demand or other positive-pressure mode
Not in excess of 100,000 $\mu\text{g}/\text{m}^3$	<ul style="list-style-type: none"> • Full facepiece supplied air respirator operated in pressure demand or other positive-pressure mode, e.g., type CE abrasive blasting respirators operated in a positive-pressure mode
Greater than 100,000 $\mu\text{g}/\text{m}^3$ unknown concentration, or fire fighting	<ul style="list-style-type: none"> • Full facepiece SCBA operated in pressure demand or other positive-pressure mode

APPENDIX C

EXPOSURE CONTROL STRATEGY DURING RENOVATION/PAINTING/SANDING OPERATIONS OF SURFACES CONTAINING 600 PPM LEAD OR GREATER

1.00 GENERAL

Contractor shall take measures to prevent contamination of indoor surfaces, the environment, and personnel.

2.00 REQUIREMENTS

2.01 Cal/OSHA regulates lead exposure and has assigned a Permissible Exposure Limit of 50 micrograms per cubic meter. At a minimum contractor will follow the *Lead in Construction* safety orders as specified under Cal/OSHA regulation Title 8, Section 1532.1.

2.02 The building shall remain unoccupied during renovation activities. The area shall be secured with barrier tapes to prevent unauthorized personnel from entering the work areas.

2.03 All HVAC systems must be turned off prior to commencement of sanding activities. Cover the air vents with plastic after turning off the system.

2.04 Carpets and all furniture should be removed prior to sanding activities.

2.05 Only vacuum cleaners equipped with HEPA filters should be used to clean-up interior dusts.

2.06 A layer of 6-mil polyethylene sheeting shall be laid over the entire floor.

2.07 All windows should be kept closed to prevent dust and chips from leaving the area.

2.08 Dry sanding is not allowed.

2.10 **Wet Scraping**

2.11 A scraper attached to a HEPA vacuum is recommended for the scraping process.

2.12 Wet scraping can also be done by misting the surface with water to minimize dust generation. A scraper can be used to remove loose chips of paint.

2.13 Use a damp rag to collect large chips that fall on to the 6-mil plastic floor containment.

2.14 HEPA vacuum paint dusts on the plastic sheeting.

2.20 **Wet Sanding**

2.21 Traditional orbiting sanding devices may be used only in conjunction with a HEPA vacuum filter attachment.

- 2.22 Wood, metal, and painted surfaces that require a fine cosmetic finish may be sanded using wet/dry sandpaper and water or an oil paint solvent.
 - 2.23 Relatively rough surfaces may be finished using wet foam sanding blocks created by dipping a sponge in an aluminum oxide grit. These sponge sanders are ideally suited for wet sanding and can be easily cleaned by immersing in a bucket of 5 -6% trisodium phosphate (TSP).
- 2.30 **Surface Cleaning**
- 2.31 HEPA vacuum all surfaces (sanded walls, windows, and floors); follow by surface wipe cleaning with a 5-6% TSP solution and rinse with water. A two-bucket system should be used: one for the cleaning solution and the other for rinsing using a new sponge. Change the wash water at least once in each room.
 - 2.32 Begin at the top of each room and work down.
 - 2.34 When vacuuming, use a crevice and brush tool where appropriate.
 - 2.35 HEPA vacuum the polyethylene sheeting prior to removal.
 - 2.36 Remove and dispose of HEPA vacuum cleaner bags outside of the building.
 - 2.37 Repaint surfaces with paint free of lead, mercury, and other heavy metals.
 - 2.38 Contact EHS for final clearance. Surface wipe samples of floors and windows will be collected to ensure surfaces do not have excessive lead residues. Clearance levels set by EPA/Housing and Urban Development Guidelines will be followed.
- 2.40 **Waste Disposal**
- 2.41 All HEPA filters must be disposed of as required by EHS Hazardous Waste Department.
 - 2.42 The contractor must obtain prior approval from EHS Hazardous Waste Department on any proposed TSDF.

APPENDIX D

EXPOSURE CONTROL STRATEGY DURING DEMOLITION/SANDING/PAINTING of SURFACES CONTAINING LESS THAN 600 PPM LEAD

1.00 GENERAL

Contractor shall take measures to prevent contamination of indoor surfaces, the environment, and personnel. All painted surfaces contain lead.

2.00 REQUIREMENTS

- 2.01 Cal/OSHA regulates lead exposure and has assigned a Permissible Exposure Limit of 50 micrograms per cubic meter. At a minimum contractor will follow the *Lead in Construction* Safety Orders as specified under Cal/OSHA regulation Title 8, Section 1532.1.
- 2.02 At a minimum, the area under renovation shall remain unoccupied during renovation activities. The area shall be secured with barrier tapes to prevent unauthorized personnel from entering the work areas.
- 2.03 All HVAC systems must be turned off prior to commencement of sanding activities or demolition activities. Install critical barriers by covering the air vents and door openings with plastic after turning off the HVAC system.
- 2.04 Building surfaces to be demolished should be wetted down with water to minimize the dispersal of paint dust. Surfaces should be substantially wet so that there are no visible dust dispersed in the air.
- 2.05 EHS must be contacted for perimeter air monitoring.

APPENDIX E

GUIDANCE ON WASTE MANAGEMENT FOR LEAD ABATEMENT ACTIVITIES

Wastes generated from lead abatement, or any of the activities listed above, may be regulated by the Department of Toxic Substances Control (Department) because they contain lead, a toxic substance. Wastes from the use of chemical paint strippers may also be corrosive. A corrosive waste has a pH ≤ 2.0 or ≥ 12.5 , or it corrodes steel at a rate greater than 6.35 mm per year.¹

In California, there are two regulatory levels for wastes contaminated with lead, the Total Threshold Limit Concentration (TTLC) and the Soluble Threshold Limit Concentration (STLC). The regulatory limits for lead are 1000 mg/kg and 5.0 mg/L, respectively.² In addition, federal law (Resource Conservation and Recovery Act or RCRA) regulates lead by establishing a maximum concentration of 5 mg/L. Although this level is the same as California's STLC, federal law specifies a different testing procedure.³

Some wastes that may be generated by lead removal and clean-up activities include paint chips, dust, chemical stripper sludge, wastewater, rags, sponges, filters, and large debris such as doors, casements, jams, and moldings. EHS recommends that lead paint wastes be segregated into the following categories to aid in classifying the wastes as hazardous or nonhazardous. Depending on the quantities of wastes generated, it may be economical to dispose of all wastes in category A as hazardous without testing. According to U.S. EPA tests,⁴ wastes in category B are less likely to be hazardous wastes, and thus they should be tested for proper classification. Solid components coated with intact, unpeeling paint may test as hazardous if the paint has a high lead content; plastic sheeting may test as hazardous if a heat gun was used to remove paint.⁵ Segregating Category A wastes from Category B wastes may result in a reduction in the volume of hazardous waste generated.

Table 1

CATEGORY A: WASTE USUALLY FOUND TO BE HAZARDOUS

- Paint chips and dust from vacuum debris and dust
- Waste wash water
- Sludge from chemical stripping
- Rags, sponges, mops, HEPA filters, scrapers, and other materials used for testing, abatement and clean-up

Table 2

CATEGORY B: WASTES THAT MAY BE HAZARDOUS

- Disposable work clothing
- Respirator filters
- Polyethylene (plastic) sheeting
- Solid components coated with intact, unpeeling paint, such as doors, casements, molding, and jams

¹Title 22, California Code of Regulations (22 CCR), § 66261.22.

² 22 CCR, § 66261.24 (a)(2) and Table II.

³ see 22 CCR §66261.24 (a)(1) and Table I.

⁴ U.S. EPA. 1993. Applicability of RCRA disposal requirements to lead-based paint abatement wastes. Final Report. Technical Programs Branch, Office of Pollution Prevention and Toxics. March 1993

⁵ Ibid

*Excerpt from *California Environmental Protection Agency, Department of Toxic Substances Control*

RCRA Wastes

Lead wastes are RCRA wastes if, when tested by the Toxicity Characteristic Leaching Procedure (TCLP), the lead content equals or exceeds 5.0 mg/L.⁶ While this is the same regulatory level as California's STLC, the TCLP test extracts less lead from a sample than does California's test. The EPA hazardous waste number for lead is D008. D008 wastes are subject to Land Disposal Restrictions (LDR), and must meet the treatment standard of 5.0 mg/L or less extractable lead before disposal.⁷

California-only hazardous wastes

If the lead content of a sample of waste is less than 5.0 mg/L using the TCLP, but is greater than or equals the TTLC or STLC (applying the Waste Extraction Test, or WET), then the waste is a California-only hazardous waste, also known as a non-RCRA waste. The compliance date for these metal-containing solid wastes to be treated to the standards has been extended to January 1, 1996.⁸

Debris

Hazardous debris is defined as⁹:

- Solid discarded material exceeding a 60 mm (2.5 in) particle size intended for disposal;
 - a manufactured object; or plant or animal matter; or natural geologic material.
- Debris does not include those materials for which there is a specific treatment standard (e.g., lead-acid batteries).

Hazardous debris, such as doors and moldings, is subject to LDR and must be treated prior to land disposal using extraction, destruction, or immobilization technologies, which are defined in Table 1 of 22 CCR § 66268.45. Hazardous debris that is treated using one of the specified extraction or destruction technologies of Table 1 and that no longer exhibits a characteristic of hazardous wastes after treatment is not a hazardous waste and need not be managed in a permitted hazardous waste landfill. Residuals from the treatment (e.g., lead paint) must be separated from the treated debris and managed as hazardous waste.¹⁰

⁶ See 22 CCR § 66261.24 (a)(1).

⁷ See 22 CCR § 66268.40 Treatment Standards for Hazardous Waste.

⁸ Senate Bill 1574, amendments HSC § 25719.7

⁹ 22 CCR § 66261.10. Definitions.

¹⁰ 22 CCR § 66268.7(d) and 66268.45.