



U.S. General Services Administration  
Rocky Mountain Region 8 Public Buildings Service  
Office of Facilities Management - Industrial Hygiene Group  
One Denver Federal Center, Building 41  
Denver, CO 80225

## GSA BASE LEAD MATERIAL DISTURBANCE REQUIREMENTS

NOTE: This document provides the minimum (base) GSA requirements for all lead disturbing activities at a GSA-administered building. Lead disturbing activities includes but is not limited to any sanding, burning, welding, cutting, sawing, abrading, scraping, or otherwise impacting materials with lead containing paints or coatings or other building materials containing lead. Specific requirements for the disturbance or removal of lead containing materials may vary due to field conditions, types or quantities of involved lead materials, lead content, proposed work activity methodologies, controls, etc. For activity-specific requirements please consult with the GSA Region 8 Regional Industrial Hygienist. *NOTE: If the building contains pre-1978 residential dwellings or child-occupied facilities, then additional requirements from EPA, HUD and the state environmental protection agency may also apply.*

### 1. PROJECT OBJECTIVES

- 1.1. The contractor shall provide all labor, materials, equipment and supervision necessary to perform disturbance of materials with lead containing paints or coatings ("Lead containing paint" or "LCP") or other lead containing materials.

### 2. DEFINITIONS

- 2.1. "Lead Disturbing Activities" includes but is not limited to any demolition or renovation activity that includes the sanding, burning, welding, cutting, sawing, abrading, scraping, or otherwise impacting materials with lead containing paints or coatings, or other building materials containing lead.
- 2.2. "Lead Containing Paint." Under the OSHA Lead in Construction Standard disturbance of paints and coatings with any detectable level of lead are regulated, not just the EPA/HUD definition of lead based paint of 0.5% by weight. **Therefore, all paints and coatings with any lead content shall be considered as Lead Containing Paint (LCP) and managed as such.**

### 3. PERMITTING/REGULATIONS/CODES

- 3.1. Contractor shall be responsible for obtaining all necessary local, state, and federal permits and licenses and payment of related fees.
- 3.2. Contractor shall comply with all applicable federal, state, and local regulations including but not limited to:
  - 3.2.1. Occupational Safety & Health Administration (OSHA) Lead Occupational Safety and Health General Industry Standard - 29 CFR 1910.1025
  - 3.2.2. OSHA Lead Safety and Health Regulations for Construction Standard – 29 CFR 1926.62



- 3.2.3. OSHA Respiratory Protection Standard - 29 CFR 1910.134
- 3.2.4. U.S. Environmental Protection Agency (EPA) Resource Conservation and Recovery Act Regulations - 40 CFR 260 et seq.
- 3.2.5. Federal Management Regulation, Real Property, Safety and Environmental Management, Lead - 41 CFR 102-80.30
- 3.2.6. U.S. Department of Transportation Hazardous Material Transportation Regulations – 49 CFR 171 and 172
- 3.2.7. State environmental protection agency's hazardous waste management rules and regulations.
- 3.3. All work shall comply with codes and standards applicable to each type of work through the course of this project. The contractor shall also comply with the requirements of GSA BuildGreen standards, and PBS P-100.

#### 4. LEAD DISTURBANCE REQUIREMENTS

##### 4.1. General

- 4.1.1. All regulated lead disturbing activities shall be conducted by a qualified contractor with the proper licenses, certification, training, experience, personnel, and equipment necessary to properly conduct the work.
- 4.1.2. Contractor shall field verify all conditions, requirements, and quantity of lead containing material to be disturbed at time of pre-bid walk through.
- 4.1.3. Contractor to coordinate schedule of work with the GSA Building and Project Manager.

##### 4.2. Lead Disturbing Work Practices and Control Requirements

- 4.2.1. The Contractor and their OSHA-defined Competent Person shall evaluate and implement all necessary measures to comply with the OSHA Lead in Construction Standard (29 CFR 1926.62) and ensure that any building occupants or other non-lead workers are not exposed to lead or lead dust per 29 CFR 1910.1025. This shall include but is not limited to:
  - 4.2.1.1. All workers engaging in lead disturbing activities shall be properly trained per the OSHA standards.
  - 4.2.1.2. Proper personal protective equipment (PPE) shall be used as determined by hazard evaluations conducted by the Contractor's OSHA-defined Competent Person. Workers shall have the proper training, medical surveillance and clearance, and fitting testing.



- 4.2.1.3. Work areas shall be marked and demarcated with the proper signage, and access shall be restricted.
- 4.2.1.4. Work areas shall be isolated and proper engineering controls implemented to minimize the potential for lead dust to migrate out of the work areas, as appropriate. This can include:
  - 4.2.1.4.1. Floors in the work area covered with 6-millimeter polyethylene sheeting and walls covered with 4-millimeter or greater polyethylene sheeting.
  - 4.2.1.4.2. Protection of the HVAC system through 6-millimeter polyethylene critical barriers over air supply and return ducts
  - 4.2.1.4.3. Critical barriers over all openings into the work area
  - 4.2.1.4.4. Establishment of negative pressure in the work area using high efficiency particulate air (HEPA) filter equipped negative air machines (NAM)
- 4.2.1.5. Proper equipment and work practices shall be implemented to minimize the potential for lead dust generation. This includes but is not limited to:
  - 4.2.1.5.1. Use of HEPA-shrouded equipment
  - 4.2.1.5.2. Application of water at point of cut
  - 4.2.1.5.3. Prohibition on dry sweeping, compressed air, etc.
  - 4.2.1.5.4. All vacuums shall be industrial grade equipped with true HEPA filters
  - 4.2.1.5.5. Structural steel, piping or other metal substrates with LCP that needs to be cut, welded, or heated shall be stripped of paint in the affected area prior to cutting, welding or heating
  - 4.2.1.5.6. If LCP needs to be scrapped off, Contractor shall use wet scraping with a HEPA vacuum or shroud at point of scrape
  - 4.2.1.5.7. For the removal or disturbance of unpainted copper piping, cut the piping above or below the solder joint and avoid heating up the pipe
- 4.2.1.6. The Contractor shall conduct an initial exposure assessment and ongoing monitoring as required.
- 4.2.1.7. Promptly clean up dust and debris on an ongoing basis in the work areas during lead disturbing activities and ensuring that proper engineering controls and hygiene practices are continuously implemented to prevent migration or tracking out of dust and debris from the regulated areas. Discovery of dust and debris outside of regulated areas will require an immediate assessment, response, and cleanup.



- 4.2.1.8. Workers shall practice good hygiene practices in accordance with the OSHA standard
- 4.2.2. Any welding, cutting or heating of lead containing materials shall also meet applicable requirements of 29 CFR 1926.353(c)(2)(i) and 29 CFR 1926.354(c)(1) if performed in an enclosed space.
- 4.2.3. Contractor shall not seek or apply for any variance or alternative work procedures from any authority having jurisdiction (AHJ) unless previously approved in writing by the GSA Regional Industrial Hygienist. Once approved by GSA, Contractor may request a variance or alternative work procedures in writing from any AHJ and must receive written approval from the AHJ prior to the commencement of lead disturbing activities. Written AHJ approval of any variance or alternative work procedures shall be provided to GSA.
- 4.2.4. Negative air machine (NAM) exhaust shall be exhausted to the exterior of the building, if feasible.
- 4.3. Final Clean and Oversight Requirements
  - 4.3.1. Depending upon site-specific factors, including but not limited to the extent and type of lead disturbing activities, lead content of the affected materials, work methods and engineering controls, proximity to occupied areas, etc., the GSA Region 8 Regional Industrial Hygienist may require third-party oversight of the lead disturbing activities in accordance with this section.
  - 4.3.2. In each work area upon the completion of disturbing activities, the Contractor shall perform final cleaning of the regulated areas including on top of ductwork, conduits, other horizontal surfaces, etc., by wet wiping and use of HEPA filtered vacuums, as directed.
  - 4.3.3. Third-party oversight shall be conducted by a qualified industrial hygienist, as directed. This can include visual observations of work practices and controls, ambient air sampling, final visual clearances, and final wipe clearances.
  - 4.3.4. If the area does not pass final clearances, the Contractor shall re-clean the area at no additional cost, and the process will be repeated until clearance is achieved.
  - 4.3.5. Upon successful clearances, the Contractor shall deregulate the area by properly removing all waste, remaining items and equipment, controls, and signage.
- 4.4. Lead Bearing Waste Material Disposal Requirements
  - 4.4.1. All lead containing debris shall be double bagged in 6-millimeter, labeled polyethylene bags, containerized, and transported and properly disposed of off-site at an appropriate facility.
  - 4.4.2. Contractor shall be responsible for the proper characterization and management of lead bearing waste in accordance with applicable federal, state, and local hazardous waste regulations including 40 CFR 260-299, and 49 CFR Parts 171 & 172.



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4.4.3. Lead bearing waste shall be assumed to be hazardous waste due to the characteristic of toxicity (Lead, EPA Waste Code D008) or have representative wastestream samples submitted to an accredited analytical laboratory for analysis via EPA Method SW-846 Test Method 1311: Toxicity Characteristic Leaching Procedure (TCLP).

4.4.4. Metal building materials containing lead or covered with LCP may be recycled provided all applicable regulations are met, the recycling destination facility accepts lead painted metal, and the presence the lead painted metal is disclosed to the recycling destination facility.

## 5. SUBMITTAL AND DELIVERABLE REQUIREMENTS

### 5.1. Lead Disturbance Specific Pre-Work Submittals

5.1.1. Prior to the commencement of lead disturbing actions, the Contractor shall provide the following documentation to GSA for review and approval by the GSA Project Manager and GSA Regional Industrial Hygienist:

5.1.2. Contractor shall provide a written method of procedure (MOP) providing the following at a minimum:

5.1.2.1. Statement of contractor's qualifications and copies of the firm's relevant licenses or certifications, worker certification and training, as applicable

5.1.2.2. Types, quantities, and locations of lead disturbing work to occur

5.1.2.3. A very detailed description of specific controls and work methods to be employed for each type of lead disturbing work

5.1.2.4. Number and types of regulated areas

5.1.2.5. Project phasing and tentative schedule

5.1.2.6. Waste characterization and management including how lead bearing will be bagged, managed, characterized, and the name and address of disposal or recycling facility(ies) to be used

5.1.2.7. Copies of safety data sheets (SDSs) for all chemical products to be used.



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## 5.2. Lead Disturbance Specific Close-Out Deliverables

5.2.1. Upon completion of lead disturbing activities, the Contractor shall provide the following documentation in a closure report:

- 5.2.1.1. A written statement by the Contractor on their company letterhead describing the lead disturbing activities, types, quantities and location of disturbing, controls and work methods that were used, waste bagging and handling, and name and address of disposal or recycling facility(ies).
- 5.2.1.2. Copies of firm's licenses and certifications
- 5.2.1.3. Copies of current certification, licenses, training for all lead workers
- 5.2.1.4. OSHA-required respirator fit testing and medical clearance documentation for all lead workers
- 5.2.1.5. Copies of personal air monitoring data
- 5.2.1.6. Legible copies of all daily logs.
- 5.2.1.7. Legible copies of waste characterization data, final signed waste manifests or all other related shipping and disposal documentation.