Exterior Removal of Lead-Based Paint is regulated by the RI Dept. of Environmental Management.

The air pollution regulations do not restrict who may remove lead based paint from exterior surfaces, but do control how the work is done. Included but not limited to the restrictions are:

⇒ An impenetrable material must be secured on the ground at the work site to prevent any paint chips, dust or other debris, generated by the removal operation, from being deposited on the ground. If power sanding or sand blasting equipment will be used, it must be attached to a HEPA (High Efficiency Particulate Air) vacuum system that collects all dust and debris generated by the operation. The sanding disk must not be wider than the surface that is being sanded.

The use of flammable or methylene chloride-containing paint strippers, open flame burning, and heat guns operated at temperatures above 1000ºF are all prohibited. Exterior surfaces must be misted with water prior to manual scraping. Dry scraping is not allowed.

At the end of each workday all visible debris must be collected. Spray all ground cover and other sheets used for containment with a fine mist of water and collect the residue.

At the conclusion of the paint removal project, place all paint chips, debris and plastic sheets used for containment in single 6-mil or double 4-mil plastic bags or other appropriate containers. Securely seal and store all bags and containers and dispose of properly.

⇒ The Lead Hazard Mitigation Law which takes effect on July 1, 2005 is designed to provide all Rhode Island residents with access to housing that is adequately maintained. The law sets minimum standards to help keep properties safe and healthy for residents.

For further information regarding the lead hazard mitigation law, contact the Rhode Island Housing Resources Commission at: (401) 450-1350

Through enforcement of the Rhode Island Rules and Regulations for Lead Poisoning Prevention, Real Estate Disclosure Rule, and the Pre-Renovation Education Rule, the Environmental Lead Program continues to reduce the incidence of lead poisoning in Rhode Island, and create a safer living environment for all Rhode Islanders.

To report unsafe work practices on the exterior of a building, the Rhode Island Department of Environmental Management should be contacted at (401) 222-1360. To report unsafe work practices on the interior of a dwelling, contact Rhode Island Department of Health’s Environmental Lead Program at (401) 222-1417.

For further information call:

RI Workers’ Compensation Education Unit
(401) 462-8100 choose "1" www.dlt.state.ri.us

US Department of Labor/OSHA
(401) 528-4669 www.osha.gov

RI Dept. of Environmental Management (DEM)
(401) 222-3424 www.state.ri.us/dem

RI Committee on Occupational Safety & Health
(401) 751-2015 www.coshnetwork.org/RICOSH.htm

RI Department of Health
(401) 222-3424 www.health.state.ri.us

This brochure is not a complete summary of your obligations, nor is the information provided intended to determine full compliance with any state or federal law concerning this health and safety issue, or as a substitute for medical or legal advice.

Equal opportunity employer/program. Auxiliary aids and services are available upon request to individuals with disabilities.

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Through enforcement of the Rhode Island Rules and Regulations for Lead Poisoning Prevention, Real Estate Disclosure Rule, and the Pre-Renovation Education Rule, the Environmental Lead Program continues to reduce the incidence of lead poisoning in Rhode Island, and create a safer living environment for all Rhode Islanders.
Lead has been poisoning workers for thousands of years, and it can damage the central nervous system, cardiovascular system, reproductive system, hematological system, and kidneys. When absorbed into the body in high enough doses, lead can be toxic. Overexposure to lead is one of the most common overexposures found in industry. Lead overexposure is a leading cause of workplace illness. When workers breathe in lead as a dust, fume, or mist, their lungs and upper respiratory tract absorb it into the body, and can also absorb lead through the digestive system if it enters the mouth and is ingested. 

**Hazards of Lead**

Lead can have many varied effects:

- Loss of appetite
- Constipation
- Nausea
- Excessive tiredness
- Headache
- Fine tremors
- Colic with diarrhea
- Weakness
- Nervous irritability
- Hyperactivity
- Muscle and joint pain or soreness
- Anorexia
- Pallor
- Insomnia
- Numbness
- Dizziness
- Anxiety

The construction industry formerly used lead solder for roofs, cornices, tank linings, however it no longer does. In the plumbing trade soft lead solder was used for soldering tinplate and copper pipe joints. In 1990, plumbers saw the end of lead solder and the change over to a lead free product for soldering all plumbing and water connections. Construction projects vary in their scope and potential for exposing workers to lead and other hazards. Projects such as removing paint from a few interior residential doors may involve limited exposure. Workers potentially at risk for lead exposure include those involved in iron work, demolition work, painting, lead-based paint abatement, plumbing, heating and air conditioning maintenance and repair, electrical work, carpentry, renovation, and remodeling work. Plumbers, welders, and painters are among those workers most exposed to lead. With the increase in highway work, bridge repair, residential lead abatement, and residential remodeling, the potential for exposure to lead-based paint has become more common. Workers at the highest risk of lead exposure are those involved in abrasive blasting and welding, cutting, and burning on steel structures.

OSHA’S LEAD IN CONSTRUCTION STANDARD

29CFR 1926.62

OSHA’s rule directs employers to control lead exposures and keep them below a certain limit. To accomplish this, an employer must adopt a set of controls and must measure lead levels by testing the air and the worker. The standard establishes maximum levels of exposure to lead for all workers covered, including a permissible exposure limit (PEL) and action level (AL). The PEL sets the maximum worker exposure to lead. The AL is the level at which an employer must begin specific compliance activities outlined in the standard. Employers of construction workers are responsible for developing and implementing a worker protection program. The employer should as needed, consult a qualified safety and health professional to develop and implement an effective site specific worker protection program. For each job where employee exposure exceeds the PEL, the employer must establish and implement a written compliance program to reduce employee exposure to the PEL or below. The compliance program must provide for frequent and regular inspections of job sites, materials, and equipment by a competent person. Written programs must be reviewed and updated at least every six months. An employer is required to conduct an initial employee exposure assessment of whether employees are exposed to lead at or above the AL. Initial monitoring may be limited to a representative sample of those employees exposed to the greatest concentrations of airborne lead. The best indicator of personal lead exposure is through a blood test to indicate elevated blood lead levels.

Analysis of blood lead samples must be conducted by an OSHA approved lab and be accurate (to a confidence level of 95 percent) within plus or minus 15 percent, or 6 µg/dL, whichever is greater. Until the employer performs an exposure assessment and documents that employees are not exposed above the PEL, OSHA requires some degree of interim protection for employees. This means providing respiratory protection, protective work clothing and equipment, hygiene facilities, biological monitoring, and training, as specified by the standards for certain tasks prone to produce high exposure.

The employer must provide all examining physicians with a copy of the lead in construction standard, including all appendices, a description of the affected employee's duties as they relate to the employee’s exposure, the employee's lead exposure level or anticipated exposure level, a description of personal protective equipment used or to be used, prior blood lead determinations, and all prior written medical opinions for the employee. The employer must provide up to 18 months of medical removal protection (MRP) benefits each time an employee is removed from lead exposure or medically limited. The employer must maintain any employee exposure and medical records to document ongoing employee exposure, medical monitoring, and medical removal of workers. The employer must establish and maintain an accurate record of all monitoring and other data used to conduct employee exposure assessments as required by this standard and in accordance with 29 CFR 1910.1020. If the initial assessment indicates that no employee is exposed above the AL, the employer may discontinue monitoring. The employer must notify each employee in writing of employee exposure assessment results within five working days. Whenever the results indicate that the representative employee exposure, without the use of respirators, is above the PEL the employer must include a written notice stating that the employee’s exposure exceeded the PEL and describing corrective action taken or to be taken to reduce exposure to or below the PEL.

The employer must make all records, including exposure monitoring, objective data, medical removal, and medical records available upon request to affected employees, former employees, and their designated representatives and to the OSHA Assistant Secretary and the Director of the National Institute for Occupational Safety and Health. When an employer ceases to do business, the successor employer must receive and retain all required records. If no successor is available, these records must be sent to the Director of NIOSH.

**Exposure Reduction and Employee Protection**

The most effective way to protect workers is to minimize their exposure through engineering controls, good work practices and training, and use of personal protective clothing and equipment, including respirators, where required. In addition, a rigorous housekeeping program and the observance of basic personal hygiene practices will minimize the exposure, and help prevent workers from taking lead contaminated dust into their homes where the exposure can extend to their family.

**RHODE ISLAND LEAD POISONING PROTECTION**

The RI Department of Health licenses environmental lead inspectors, lead hazard reduction contractors and lead hazard reduction workers. Their standards require anyone eliminating lead hazards to obtain training, and they can provide you with resource information on lead safe work practices.

The following lead paint removal methods are permitted:
- wet hand scraping with or without a heat gun, followed with light feather sanding; dry hand scraping with or without a heat gun; or use of a non-flammable chemical stripper that does not contain methylene chlorides.
- The use of flammable or methylene chloride paint strippers and open flame or torch burning is prohibited.

Abrasive blasting or power sanding is prohibited, except when performed by a Rhode Island licensed lead professional in accordance with the Regulations.