

NAU Inspection Thresholds and minimum work practices for Lead Based Paint

NAU requires that inspection for lead paint be performed whenever specific threshold levels of disturbance (sanding, scraping, or gross removal) of painted surfaces are planned. Below this threshold, no inspection is necessary, but workers should use lead safe work practices defined below. Even new paint can contain trace amounts of lead. OSHA requires that adequate worker protection to prevent lead poisoning be utilized even for paint with low concentrations of lead.

- 1)** Threshold for inspection: ½ sq ft (6"x12") of non-friction surfaces. Above this level, or if any friction surfaces (door and window jambs) are scheduled for disturbance, users must request an inspection for lead paint.
- 2)** Minimum work practices: Without prior inspection, all paint must be assumed to contain some quantity of lead and to protect workers and other building occupants the following work practices must be used.
 - a.** Install a plastic drop cloth below the work area adequate to catch/contain any paint debris generated
 - b.** Mist/wet the area with soapy water adequate to control the generation of dust while the work is being conducted
 - c.** Wet wipe and/or HEPA vacuum surfaces following completion of work to remove any dust residue and HEPA vacuum any debris which migrated off of the drop cloth.
 - d.** Roll drop cloth inward to capture any debris and dirty wipes or other disposable materials. Bag and seal this waste
- 3)** Waste must be given to an EHS Lead Program representative for disposal as assumed lead containing waste.

*If disturbance of any underlying building materials is necessary, that work falls under the Asbestos Program guidelines and an inspection for asbestos is still required.