Work Practices for Disturbance and Removal of Lead-Based Paint on Pre-1979 Buildings and Steel Structures

Surface Preparation for Exterior and/or Interior Work
1. For scraping surfaces, consider working with wet methods. Spray and keep the surface moist with a spray bottle.
2. For lead-based paint removal, consider working in stages: wet scraping surface, washing surface and sanding surface using a sander with a HEPA vacuum.

Clean Up for Exterior and/or Interior Work
1. Remove all visible debris from the regulated area.
2. Keep the area clean as you work by wet sweeping or by using a HEPA vacuum.
3. Dispose of lead-based paint debris in a double bag and place it in a secured container. Clean and dispose of the 6-mil plastic in the trash.
4. Remove contaminated debris carried inside a building from exterior work, with a HEPA vacuum, then clean with a disposable moist cloth or mop. Vacuum with a HEPA vacuum again.
5. Use a HEPA vacuum to clean work clothes, and change clothes before getting into a vehicle or for the interior, leaving the regulated area.
6. In addition, for interior work, wet clean with detergent any exposed interior horizontal surfaces in the regulated area and HEPA vacuum the regulated area.

For information on disposing of lead paint contaminants, call VSQG Drop-Off Program at (415) 330-1425 or VSQG Pick-Up Program at (800) 449-7587.

IMPORTANT TELEPHONE NUMBERS

For questions regarding the law, including filing a complaint about unsafe work practices and peeling paint resulting from deterioration or neglect, call the Department of Building Inspection, Housing Inspection Services at (415) 558-6220.

For information related to childhood lead poisoning, call the Department of Public Health, Children’s Environmental Health Promotion Program, at (415) 554-8930.
THE LAW

Exterior
In January 1998, a law went into effect in San Francisco that governs activities that disturb or remove painted surfaces on the exterior of any pre-1979 buildings and steel structures. The law, which is part of the San Francisco Building Code (Chapter 34, Section 3423), requires property owners and/or contractors to: notify affected parties before exterior work begins; use containment barriers prohibiting lead-based paint from migrating; and, remove visible lead paint contaminants from all regulated areas before completing work.

Interior
In July 2004, the law was amended to include activities that disturb or remove painted surfaces on the interior of any pre-1979 Occupancy Group E (day-care facilities) and Group R, Divisions 1, 2 and 3 (hotels, apartment houses and dwellings). The requirements are the same for the property owners and/or contractors except with owner-occupied pre-1979 dwelling units are exempt as long as the dwelling unit is not a licensed childcare and work debris does not migrate outside the dwelling unit.

WHY A NEW LAW?

The law was passed and later amended to prevent the public from being exposed to lead-based paint contaminants, which could cause lead poisoning. Especially in children, lead poisoning can permanently affect a child’s ability to hear, learn and grow to his/her full potential.

HIGHLIGHTS OF THE LAW

Notification Requirements
The property owner and/or the contractor are required to provide the following notification:

1. The property owner must provide residential occupants written notice of work three (3) business days before the work begins.

Also, the property owner must provide residential occupants with a copy of the United States Environmental Protection Agency (USEPA) pamphlet, “Protect Your Family from Lead-Based Paint in Your Home,” before the work begins, unless the owner has previously provided this pamphlet to residential occupants.

2. The property owner or the contractor must post a “Lead Work in Progress” sign or provide written notice to the adjacent neighbors if it is not feasible to post signs before the work begins.

For copies of the USEPA pamphlet, “Protect Your Family from Lead-Based Paint in Your Home,” call USEPA at (415) 947-4164.

For copies of the Department of Building Inspection, Housing Inspection Services written notices and “Lead Work in Progress” sign, call Housing Inspection Services at (415) 558-6220.

Prohibited Practices
No person may use the following prohibited practices:

1. Open flame burning or torching;
2. Heat guns without containment and barrier systems or operating above 1,100 degrees Fahrenheit;
3. Hydro-blasting or high-pressure wash without effective containment and barriers systems; and,
4. Dry manual sanding or scraping, or machine sanding or grinding, or abrasive blasting or sandblasting without effective containment and barrier systems or a HEPA vacuum local exhaust tool.

Performance Standards
Any person doing work governed by the SFBC 3423 must:

1. Restrict access by third parties to the “regulated area”, including to any area contaminated with work debris.
2. Containment and barrier systems are to be established that contain the work debris within the “regulated area”.
3. Protect ground from contamination by work debris by laying 6-mil polyethylene plastic sheeting (or two layers each 3-mil) on the ground extending at least 10 feet from the work surface when possible.
4. Protect floor and furnishings (e.g., any horizontal surfaces, carpets, drapes, shades and furniture) in the interior from contamination by work debris by laying 6-mil plastic across the surface when it is impracticable to remove the furnishings.
5. Prevent migration of work debris beyond the established containment and barrier systems during the course of work. Efforts may include providing secure 6-mil plastic protective covering, bagging, shrouding, covering and sealing any windows, doors and vent openings in the regulated areas; and, instituting measures to prevent the tracking of dust from the regulated areas.
6. Clean up standards for interior and exterior work include, but are not limited to, making all efforts to remove all visible work debris from the regulated areas. In addition, for interior work, such efforts include wet cleaning with detergent any exposed interior horizontal hard surfaces in the regulated areas and HEPA vacuum in the regulated areas.

RECOMMENDED SAFE WORK PRACTICES

Containment and Barrier Systems for Exterior Work
1. Tape one layer of 6-mil plastic to the side of the building (no gaps between plastic and building) to collect falling paint debris. Extend plastic 10 feet beyond the perimeter of working surfaces (or less if distance to next building is less than 10 feet). Keep all windows within 20 feet of working surfaces closed, including windows of adjacent structures.
2. Tape two layers of 6-mil plastic to the interior wall to prevent debris from entering through building windows when working on the window from the outside. Extend plastic 5 feet beyond perimeter of window being treated/replaced. All windows in dwelling should be kept closed. All windows in adjacent dwellings that are closer than 20 feet to the work area should be kept closed.
3. Cover all areas that might be contaminated by paint debris with 6-mil plastic, including the soil and plants in the yard.

Containment and Barrier Systems for Interior Work
1. Protect with 6-mil plastic any floors, horizontal surfaces, carpets, rugs, drapes, curtains, blinds, shades and furniture in the regulated area. If possible, it is better to remove carpets, rugs, drapes, curtains, blinds, shades and furniture from the regulated area.
2. Use plastic with an airlock flap on doorways that are used to enter and exit the regulated area, if the regulated area is an entire room or rooms.
3. Turn off heating ventilation and air conditioning (HVAC) system and cover air vents with plastic.
4. Collect and handle lead contaminated water produced by hydro-blasting or high-pressure wash according to State and local laws.

The United States Department of Housing and Urban Development (HUD) Guidelines for the Evaluation and Control of Lead-Based Paint Hazards In Homes has suggestions on effective containment and barrier systems. For information about the HUD Guidelines, call HUD at (800) 245-2691.

For information about handling lead contaminated