

LEAD GUIDANCE DOCUMENT FOR CONTRACTORS**A. Regulatory Status**

1. Lead paint chips and lead containing construction debris **MUST** be disposed of by Environmental Health and Safety (EHS).
 - All waste is shipped off-site for disposal.
 - A hazardous waste manifest must be used.
 - Manifests may only be signed by a designated member of the Environmental Affairs Section (EAS) of Environmental Health and Safety (EHS) at Yale University (432-6545).

B. Container Management

1. Lead paint chips and lead containing debris are to be stored in DOT approved containers that are compatible with the material to be stored and that can be securely closed.
 - Containers from 5 gallons to 55 gallons can be provided by EAS, if requested in advance. Please allow 3-5 business days for the delivery of containers.
 - The delivery and removal of roll-off containers **MUST** be scheduled by EAS to ensure regulatory compliance. Please call JoAnn Farrell at 432-9384 to coordinate the delivery and removal of roll-off containers. Please allow 3-5 business days for the delivery and removal of the containers.
2. Ensure that each container holding lead paint chips is labeled with the words "Hazardous Waste" and "Lead, Cadmium, Chromium, Paint". If paint stripper was used to remove the paint, ensure that each container is labeled with the words "Hazardous Waste" and "Lead, Cadmium, Chromium, Paint" plus the specific chemical components of the paint stripper used. Refer to the Material Safety Data Sheet (MSDS) for the paint stripper to determine the specific chemical components.
3. Ensure that each container holding lead containing windows is labeled with the words "Hazardous Waste" and "Lead". If the windows also contain asbestos, ensure that each container of lead and asbestos containing windows is labeled with the words "Hazardous Waste" and "Lead, Asbestos."
4. Ensure that each container is marked with an accumulation start date (i.e. the date waste is first placed in the container).
5. Keep each container closed when waste is not being added.
6. If plastic bags are used to collect lead paint chips or lead containing windows, each plastic bag must be labeled as described above prior to adding to a larger container. If any plastic bags are torn, they must be placed into a fully intact plastic bag. Ensure that each bag is tape securely shut before placing any plastic bags into a container.
7. Drums and smaller containers must be stored in a secure, dry area away from public access. Roll-offs must be stored in a secure area away from public access whenever possible.
8. Fax to 432-6148 or email to waste.requests@yale.edu a "Construction Site Waste Container Delivery Request" form to EHS for delivery of containers.
9. Contact JoAnn Farrell at 432-9384 to arrange for removal of containers.

C. Other Important Notes

1. Weekly inspections of the containers shall be carried out by a member of EAS.
2. Daily inspections of the work areas should be done by the site manager to assure no lead paint or other lead containing debris have spilled on the ground, that any spills are promptly cleaned up, and that all containers are closed and properly marked.
3. Spill cleanup materials are to be provided by the contractor and should include:
 - Plastic bags

- Rolls of tape
 - Rakes
 - Broom and dust pan
 - Vacuum cleaner with HEPA filter
4. In the event of a spill of lead paint or lead containing debris, the following should be notified:
- Yale Environmental Health and Safety emergency number (785-3555) AND
 - Brenda A. Armstrong, Environmental Affairs Manager
Yale Environmental Health and Safety
Work number: 203-432-3219
Cell phone: 203-627-8241 AND
 - Company performing the lead
5. If any regulatory agency should come on site (OSHA, CTDEP, EPA)
- Ask the representative to wait until a member of EHS arrives
 - Contact EHS immediately (785-3555) with the name of the representative and the agency
 - DO NOT deny the representative access to the site, but request that the inspectors await the arrival of an EHS representative
6. All inquiries pertaining to the storage and/or disposal of lead paint and lead contaminated debris should be directed to JoAnn Farrell at 432-9384.