

Yale University
Environmental Health and Safety
Environmental Affairs Section

Lead Guidance Document for Contractors

A. Regulatory Status

1. Lead based paint chips, lead contaminated construction debris failing TCLP analysis, lead contaminated PPE, lead contaminated windows, lead contaminated soil, and lead contaminated liquid 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 (203-432-6545).

B. Container Management

1. Lead based paint chips, lead contaminated construction debris failing TCLP analysis, and other items/materials that have been confirmed to be hazardous waste such as lead contaminated windows, lead contaminated soil, and lead contaminated liquid are to be stored in Department of Transportation (DOT) approved containers that are compatible with the material to be stored and that can be securely closed.
 - Containers from 30 gallons to 1 cubic yard are provided by EAS. 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 the RCRA Compliance Officer at 203-432-9384 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 each container holding lead paint chips/debris is labeled with the words "Hazardous Waste" and "Lead, Cadmium, Chromium, Paint, Debris". If paint stripper was used to remove paint, ensure each container is labeled with the words "Hazardous Waste" and "Lead, Cadmium, Chromium, Paint, Debris" plus all specific chemical contents of the paint stripper used. Refer to the Safety Data Sheet (SDS) for the paint stripper to determine the specific chemical contents.
3. Ensure each container holding lead contaminated soil is labeled with the words "Hazardous Waste" and "Soil containing Lead."
4. Ensure each container holding lead contaminated liquid is labeled with the words "Hazardous Waste" and "Lead, Cadmium, Chromium, Paint" plus all specific chemical contents of the liquid.

5. Ensure each container holding windows with lead came is labeled with the words “Hazardous Waste” and “Windows containing Lead.” If the windows also contain asbestos, ensure each container of lead and asbestos containing windows is labeled with the words “Hazardous Waste” and “Windows containing Lead and Asbestos.” If the windows also contain lead paint, ensure each container is labeled with the words “Hazardous Waste” and “Windows containing Lead, Cadmium, Chromium, Paint (and Asbestos, if applicable).”
6. Ensure each container is marked with an accumulation start date (the date waste is first placed in the container).
7. Keep each container closed when waste is not being added.
8. If plastic bags are used to collect lead paint chips, debris or windows, each plastic bag must be labeled as described above. If any plastic bags are torn, they must be placed into a fully intact plastic bag. Ensure each bag is tape securely shut before placing into a DOT approved container.
9. Depending on the volume of Hazardous Waste accumulated and the duration of Hazardous Waste accumulation, it may be necessary for containers of liquid waste to be stored on spill containment pallets/decks with a roof above or in a commercially available secondary containment structure with a ramp. Contractors shall consult with EHS to ensure spill containment pallets/decks or commercially available secondary containment structures that they provide are compliant.
10. Cubic yard boxes and smaller containers must be stored in a secure, dry area away from public access. Roll-offs must be stored on Yale University property and in a secure area away from public access, whenever possible.
11. Submit an online [Construction Waste Supply/Removal Request Form](#) to EHS for delivery and 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 material has 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 dustpan

- Vacuum cleaner with HEPA filter
4. In the event of a spill of lead containing material, the following should be notified:
 - Yale Environmental Health and Safety emergency number (203-785-3555)
 - Company performing the lead removal
 5. If any regulatory agency should come on site (OSHA, CTDPH, CTDEEP, EPA)
 - Ask the representative to wait until a member of EHS arrives
 - Contact EHS immediately (203-785-3555) 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 waste should be directed to the RCRA Compliance Officer at 203-432-9384.