

Risk A/T[®] Work



Risk A/T[®] Work is a forum dedicated to sharing safety and loss control tips with our brokers and insureds. Risk A/T[®] is our proprietary risk management approach promoting informed risk analysis based on two behavioral factors — Aptitude and Tolerance.

Keeping the Lead Out – Best Practices for Controlling Lead-Based Paint Hazards

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Lead is a naturally occurring metallic element found in the Earth’s crust. It is in soils, water, and the air. Much of the lead present in the environment today is from its decades long and widespread use in paints, batteries, pottery, and plumbing materials. Excessive exposure to lead increases the risk for lead poisoning, which can be debilitating and sometimes deadly.

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In this month’s edition of Risk A/T Work, we discuss practical measures to minimize lead exposures, particularly from Lead-based Paint (LBP) during renovations of buildings.

The Effect of Lead’s Presence in Residential Areas

Often found in buildings constructed prior to 1978 or newer homes in urban/industrial areas, prolonged exposure to lead and LBPs can have serious health implications. Surfaces (windows, sills, rails, etc.) painted with lead-based paints are frequent sources of lead exposures. Other common sources of inhalation, ingestion, or dermal contact can include:

- Soils in yards and playgrounds
- Lead-based consumer products (antiques, toys, food containers, and plumbing)
- Drinking Water due to corrosion of lead pipes, fixtures, or solder

The effects of lead poisoning can include anemia, weakness and kidney and brain damage. According to the US Environmental Protection Agency (EPA) and Centers for

Disease Control and Prevention (CDC), young children and pregnant women are the most vulnerable to lead’s toxic effects. For pregnant women, lead exposure can potentially cause miscarriages or stillbirths, while affected children may have delayed learning development, behavior difficulties, and possible hearing and speech problems.

Responsibilities of Property Managers and Landlords

Despite LBPs being banned in the U.S. since 1978, and mostly banned worldwide today, LBP can still be found on surfaces in many older buildings. Owners, landlords, agents, and managers of rental properties are obligated under Federal law to provide information about a buildings potential LBP and/or LBP hazards to tenants prior to them signing a lease.

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For most buildings built before 1978, landlords must give prospective tenants:

- An EPA-approved information pamphlet on identifying and controlling lead-based paint hazards, [Protect Your Family From Lead In Your Home \(PDF\)](#)
- Any known information concerning lead-based paint or lead-based paint hazards pertaining to the building
- A lead disclosure attachment to the lease, or language inserted in the lease, that includes a “Lead Warning Statement” and confirms that the landlord has complied with all notification requirements



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Many states and local municipalities also require additional inspection abatement, and remediation actions. Failure to follow them could result in fines and/or injury claims.

Best Practices for Lead Paint Repair, Renovation, and Painting

Eliminating LBP exposures can be accomplished by several methods, including encapsulating/sealing surfaces, replacing LBP-covered features (trim, windows, etc.), or physically removing the LBP layers from surfaces. Whether the building is residential or commercial use, there are best practices to safely mitigate lead exposures during a construction project:

1. **Determine if LBP is present.** Verify the presence of LBP by testing. Contact the National Lead Information Center at 1-800-424-LEAD (5323) or EPA's Lead page for more information on finding a list of certified lead testing professionals.
2. **Maintain a safe and clean workspace.** At a minimum, the work area needs to be protected by plastic sheeting that extends at least 6 feet for interior projects and 10 feet for exterior projects in all directions from the location where paint will be disturbed. A best practice for interior jobs is to remove objects such as furniture, cover floors, seal windows, etc. Work areas should be left clean each day and at the end of the project.

3. **Wear protective equipment.** Eliminate the potential for ingesting or inhaling lead on the job by using appropriate PPE. Use disposable clothing or covers to limit contamination and to ensure the lead does not travel elsewhere.
4. **Minimize the dust.** Employ controls to ensure that the work area is isolated. All tools, personnel, and items exiting the work area should be free of dust and debris. In addition, the EPA's Renovation, Repair and Painting Rule prohibits dangerous work practices so as to minimize the spread of dust.
5. **Properly dispose of wastes.** Check state and local requirements before disposing of waste and bag and seal to requirements before removing from jobsite.
6. **Verify completion of work.** Perform clearance sampling of surfaces and the work area after the work is complete. Verification sampling procedures and laboratory testing must be performed by certified professionals.

We Are Here To Help

By implementing a formal lead remediation plan into your overall safety program, you are taking an important step to protect your property, your tenants and your employees. Please reach out to your Sompo International Risk Control Specialist or contact us at +1 877 667 5733 or RiskControlQuestions@sompo-intl.com for more information.

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