

**OREGON OCCUPATIONAL SAFETY AND HEALTH DIVISION  
DEPARTMENT OF CONSUMER AND BUSINESS SERVICES**

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**PROGRAM DIRECTIVE**

Program Directive A-9  
Issued February 1, 1979  
Revised June 6, 2000

**SUBJECT:** Welding, Cutting, or Heating of Metals Coated with Lead Bearing Paint

**AFFECTED CODES/  
DIRECTIVES:** 1926.353(c)(2)(i) and 1926.354(c)(1)

**PURPOSE:** This directive explains the requirements imposed by rules 1926.353(c)(1) through 1926.354 when welding, cutting, or heating is performed in an enclosed space on metals coated with lead-bearing paint.

**BACKGROUND:** In the construction industry, rules 1926.353(a)(1) through 1926.354(d) apply jointly when welding, cutting, or heating is performed in an enclosed space on metal coated with lead bearing paint. 1926.353(c)(2)(i) requires employers to provide local exhaust ventilation or to protect employees with airline respirators. 1926.354(c)(1) requires employers to ensure that the paint is stripped back at least four inches from the area of heat application or to protect the employees with airline respirators. A presentation on the dual impact of 1926.353(c)(2)(i) and 1926.354 (c)(1) is in order.

**ACTION:**

- A. Rules 1926.353(c)(2)(i) and 1926.354(c)(1) have joint application when welding, cutting, or heating is being performed in an enclosed space on metals coated with lead-bearing paint.
- B. There must be compliance with the following dual requirements:
  - 1. At all times, the toxic preservative coating must be stripped back at least four inches from the area of heat application (1926.354(c)(1)).
  - 2. If the concentration of a substance in the breathing zone of the employee exceeds the threshold limit value (TLV) referenced in section 437-002-0382, local exhaust ventilation must be provided in addition to the stripping back procedure (1926.353(c)(2)(i)).
  - 3. When conformity with these requirements fails to reduce concentrations below the TLV, or when the techniques are impossible to implement, then employees must be provided with airline respirators (see 1926.103(a)(1)). All possible paint stripping and provision of local exhaust ventilation

must be continued even though it is determined that airline respirators must be used.

4. The area of heat application is interpreted to be the surface area that the flame or arc contacts.
5. In some instances it may be difficult to visually ascertain the edge of the area of heat application. In those instances, where because of this difficulty, it is uncertain from visual observations whether the lead-bearing paint is stripped back four inches from the area of heat application, the compliance officer shall mark the edges of the stripped surface that are distal from the center of heat application with temperature indicating crayons having 500° F melting point. Melting of the crayon markings shall be the criterion for affirming insufficient stripping of the lead bearing paint.
6. Temperature indicating crayons may be purchased locally from scientific equipment supply houses.

**EFFECTIVE**

**DATE:**

This directive is effective immediately and will remain in effect until canceled or superseded.