

# Lead Paint Policy

## Description

## OBJECTIVE

To minimize the risk of lead exposures to all members of the University community during routine maintenance related tasks.

## POLICY

Removal or disruption of lead based paint must be conducted pursuant to approved procedures and requirements of appropriate regulating agencies, and in full compliance with State and Federal laws.

This policy applies to any University building constructed prior to 1978 and to any exterior metal structure including items such as handrails and flagpoles.

The disruption of paints containing any detectable amounts of lead may result in exposure to airborne lead depending on the method of removal and other conditions in the workplace. Exposure of employees at or above the OSHA action level triggers special monitoring and training requirements.

Use of respiratory protection may be required for certain lead projects that require Environmental Health and Safety (EH&S) review. When this occurs, the workers will be required to participate in the University's respiratory protection program.

[su\_spoiler style="fancy" icon="chevron" title=" Special Requirements for Child Occupied Facilities "]  
The Environmental Protection Agency's (EPA) Lead Renovation, Repair and Painting (RRP) regulation, which became effective on April 22, 2010, requires the adherence to specific procedures during any maintenance activity that results in the disturbance of a painted surface in child occupied facilities constructed prior to 1978.

A child occupied facility is defined as any building or section of a building, constructed prior to 1978, visited regularly by a child under the age of six (6) where visits are at least twice weekly for three (3) hours or more.

The Baby Gator facility on campus and in the Human Development building as well as many of the Family Housing units and sections of the P.K. Yonge Developmental Research School meet these criteria.

The presence of lead must be determined prior to the commencement of work. If present, the work must be performed by workers with specific training in lead safe work procedures and must be under the supervision of an individual recognized by the EPA as a Certified Renovator.

The affected facilities have been surveyed for lead paint following EPA protocols. Specific survey information is available from EH&S and from representatives at each site.

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## **AUTHORITY**

By authority delegated from the University President, the Vice-President for Business Affairs is responsible for the safety of all University facilities. Under this authority, policies are developed to provide a safe teaching, research, service, housing and recreational environment.

[su\_spoiler style="fancy" icon="chevron" title=" Reference "] 29 CFR 1926.62 (OSHA Lead in Construction Standard); 29 CFR 1910.1025 (OSHA General Industry Lead Standard)

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## **RESPONSIBILITIES**

[su\_spoiler style="fancy" icon="chevron" title=" Environmental Health and Safety "] Environmental Health and Safety will provide consultative and technical assistance to campus organizations involved in the removal or disruption of lead based paint to insure compliance with state and federal regulations. Environmental Health and Safety will serve as the University liaison with regulatory agencies and serve as the clearinghouse for the dissemination of University requirements and regulatory information to groups involved in lead based paint activities.

Environmental Health and Safety can provide assistance in sample collection and analysis for the initial determination of lead content in surface coatings for jobs requiring limited sampling.

Large scale surveys and any paint sampling conducted in a child occupied facility must be completed by firms or individuals holding applicable EPA licenses.

[/su\_spoiler] [su\_spoiler style="fancy" icon="chevron" title=" Facilities Services and Department Maintenance Organizations "] Supervisors are responsible for evaluating all work activities as they relate to this policy, and for taking necessary steps to ensure their employees work in compliance with this policy.

Department heads are responsible for ensuring that their employees operate in compliance with this program.

[/su\_spoiler] [su\_spoiler style="fancy" icon="chevron" title=" Project Managers "] Managers of projects involving the actual or potential disruption of painted surfaces in a building constructed prior to 1978 shall determine the lead content of the painted surfaces.

A lead paint survey must be provided for any building or section of a building scheduled for renovation or remodeling that was constructed prior to 1978 and for any exterior structure (i.e. painted handrails) that may be affected by a construction project, regardless of age.

The use of color change spot tests to determine the presence or absence of lead in paint coatings is not an acceptable survey method. The preferred method of determining lead concentrations in paint is the analysis of paint chips by Atomic Absorption Spectrophotometry (AAS).

Materials identified as having lead paint must be further characterized to determine if they are subject to hazardous waste disposal restrictions.

All lead surveys must be reviewed by EH&S prior to distribution.

Lead survey information must be provided to the contractor and the contractor must comply with applicable worker training and worker protection directives as required by OSHA and the EPA.

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## **PROCEDURES**

University physical plant and maintenance personnel are limited to conducting routine maintenance tasks such as manual scraping or sanding of paint containing lead at concentrations not exceeding 0.06% by weight for surface preparation and the use of power tool cleaning with attached HEPA dust collection systems. The work surface must be misted with water prior to scraping or sanding and disposable drop cloths must be used to collect any dust and debris. Access to the work area must be restricted by using caution tape.

The work area surface must be wiped off with damp cloths or vacuumed with a HEPA vacuum cleaner following the completion of sanding or scraping.

All work areas shall be visually inspected after clean-up to ensure no visible dust or debris remains.

For work on surfaces containing paint with concentrations of lead above 0.06% by weight, full work area protective measures including work area isolation, air monitoring and the use of respiratory protection will be required until a negative exposure assessment (NEA) is conducted. Once an NEA is established, minimum work area requirements will include the use of dropcloths, HEPA vacuum cleaners and caution tape to restrict access to the work area.

Any waste generated from these tasks, including the dropcloths and wiping rags, must be collected, placed in a sealed plastic bag or drum (if applicable) and subjected to hazardous waste characterization testing prior to disposal. The EH&S Hazardous Materials group should be contacted for additional information regarding waste collection and characterization.

Other work, including spray applying a lead based product, using heat to remove a lead containing product, sand blasting, surface sanding or scraping that lasts more than one work shift may require additional training, air and biological monitoring, the use of engineering controls, and wearing PPE appropriate for the task. Projects falling into this category must be reviewed by Environmental Health & Safety prior to commencement.

Regardless of lead concentration or task, effective hygienic practices must be followed. These include changing or HEPA vacuuming clothes to remove dust when work is completed; washing hands before eating; and not eating or smoking in the work area.

Advanced notification of lead abatement activities and other projects impacting lead containing paint must be provided to EH&S.

A written work plan, air monitoring and final clearance sampling may be required depending on the scope of the planned project. EH&S will notify the project manager or supervisor of any additional requirements following a review of the project notification information.

Contact Environmental Health and Safety for assistance on atypical projects, or for further information regarding sample analysis or waste disposal.