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EHS-308, LEAD BASED PAINT OPERATIONS & MAINTENANCE PROGRAM

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1.0 Introduction

1.1 Purpose

The purpose of this program is to minimize potential exposure of building occupants and employees to lead dust and debris from lead-containing paint (LCP) and lead-based paint (LBP), in buildings where lead is present as prescribed in the Occupational Safety and Health Administration (OSHA) standards Code of Federal Regulations (CFR) 1910.1025 "Toxic and Hazardous Substances – Lead" and 29 CFR 1926.62 "Occupational Health and Environmental Controls – Lead".

1.2 Scope

This program is inclusive of Emory University employees, including faculty, staff, student employees, contractors, and other people who work with or in close proximity to lead dust and debris from lead-containing paint (LCP) and lead-based paint (LBP).

1.3 Responsibilities

Environmental Health and Safety Office (EHSO)

- Development, implementation, and administration of the LBP O&M Program;
- Reviewing historical documents for data or perform the necessary sampling on painted surfaces in the facility to be impacted by project activities.
- Conducting inspections, abatement oversight, waste characterization/disposal, and record keeping relating to activities performed at dormitory apartments, child-occupied facilities, or target housing as needed;
- Developing job-specific procedures (scope of work plans, specifications, etc) for task-specific lead hazard exposure;
- Ensuring abatement or maintenance actions are being conducted in accordance with project specifications, and Federal, State, and Local Regulations;
- Working with the EU community as a technical resource, including notification and lead education for occupants residing in dormitory apartments, child-occupied facilities, and target housing;
- Reviewing, updating, and evaluating the LBP awareness training; and,
- Maintaining and updating lists of Emory approved environmental consultants and contractors.

Directors, Supervisors, and Managers

- Personnel who may come in contact with lead painted materials during the performance of their duties have received the appropriate training
- Any activity that may impact lead painted materials is reported to the EHSO Asbestos Program Manager prior to beginning activities

Campus Services Facilities and Maintenance, Planning Design & Construction and Department Project Managers

Campus Services Facilities and Maintenance, Planning Design and Construction and Department Managers are responsible for ensuring that all projects performed under their direction follow all applicable Federal, State and local guidelines, as well as the following:

- Reviewing project scope of work to identify activities that may impact lead painted materials, and report them to EHSO prior to beginning activities to be monitored as needed;



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- Ensuring that all personnel performing activities are approved contractors and are properly trained to perform the activities that may impact lead painted materials; and,
- Notifying EHSO of changes in job descriptions and/or work tasks during the course of the project or activities that may result in a change to the scope of work (SOW).

Office of Residence Life & Housing / Office of Business Management

The Office of Residence Life & Housing/Office of Business Management and any additional Emory University Office or department that rents/leases dormitory apartments, child-occupied facilities, or target housing to faculty, staff, students, or visitors are responsible for the following:

- Providing occupants of dormitory apartments/target housing with an EPA pamphlet entitled "Protect Your Family from Lead in Your Home" and ensure that signed disclosure forms are obtained and maintained;
- Maintaining suspect lead based paint in such a condition that it does not provide a health hazard to the occupants;
- Ensuring that personnel who may come in contact with lead painted materials during the performance of their duties have received the appropriate training; and,
- Reporting any activities that may impact lead painted materials to the EHSO Asbestos Program Manager prior to beginning activities.

Employees

- Complying with the rules set forth by this Program.
- Completing required training.
- Reporting to EHSO, in a timely manner, the following situations:
- Renovation or maintenance activities that may disturb LBP; or,
- Changes in LBP condition.

1.4 Training Requirements

- EHSO will provide training to the EU community to create awareness of LBP exposure dangers according to 29 CFR 1910.1025(l) and 1926.62(l), as needed. This training is not a substitute for training mandated in the 40 CFR Part 745 – Lead; Renovation, Repair, and Painting Program.
- Training should be provided to employees and staff that may work around lead-based/lead-containing paint or components, but do not perform activities that disturb them.
- EHSO is responsible for ensuring that Lead Awareness training is available to all Emory University employees who work in close proximity to LCP or LBP, but do not perform activities that disturb them.
- This training shall be given by 180 days from the effective date for those employees covered by paragraph (l) (1) (ii) on the standard's effective date and prior to the time of initial job assignment for those employees subsequently covered by this paragraph and annually thereafter or whenever a new LCP or LBP is identified in a work area, whichever is sooner.
- It is the responsibility of supervisors to: ensure their employees attend training, and inform EHSO when a new employee is assigned.



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- Training will be conducted by EHSO.
- EHSO will maintain documentation of attendance which will include the employee's name, department, and signature.
- The training includes the following as required by 29 CFR 1910.1025 (l), the contents of Appendices A and B of this regulation to include the following:
 - Background to lead
 - Uses and exposure potentials
 - Health Hazards
 - Lead Standards and Exposure Limits
 - Hazard Control Techniques

1.5 Recordkeeping Requirements

Training records are retained by EHSO and available in general accordance with 29 CFR 1910.1025(l) (1) (iv) that states "The training program shall be repeated at least annually for each employee." Training records shall be retained for one year.

1.6 Program Evaluation

The written LBP O&M Program shall be re-evaluated annually and revised if necessary.

2.0 Lead Hazard Control Parameters

Lead painted materials shall not be impacted by Emory employees without proper training. Currently, Emory employees are not trained in lead safe work practices and therefore should not impact LBP/LCP components. Emory utilizes parameters from the following regulatory agencies to identify the lead content of paint.

- Lead based paint is identified as 0.5% lead by weight or greater according the Department of Housing and Urban Development (HUD).
- In EPA/HUD Child Occupied or Target Housing, activities such as abatement, repair, renovation, or maintenance activities must be performed by personnel trained according to EPA or HUD regulatory guidelines.
- A paint that has any lead content is considered to be lead containing paint, according to OSHA. EHSO recommends that contractors who disturb LCP, be trained in lead safe work practices.

3.0 Procedures

3.1 Impacting LBP or LCP

- Contact EHSO to determine if paint to be impacted by project is or is not LBP or LCP.
- EHSO will review historical documents for data on painted surfaces in the facility to be impacted by project activities.
- If it is determined that the paint to be impacted is LBP or LCP, each activity that may impact lead painted components shall be covered by a job specific scope of work. The standard operating procedure (SOP) shall:
- Outline lead management procedures and controls to be implemented to prevent lead exposures to building occupants, visitors, maintenance personnel and renovation contractors within EU owned and leased facilities.
- Be submitted to EHSO for review to ensure that applicable requirements and

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regulations are followed.

3.2 Painted Components

- Painted components either will be assumed to contain lead or be sampled.
- Testing of painted surfaces can be performed by portable X-Ray Fluorescence (XRF) and/or by lab analysis of bulk paint chip samples. The paint chip samples must be analyzed by an American Industrial Hygiene Association (AIHA) accredited laboratory. Sampling will be performed by the following:
- An EPA-accredited Lead Inspector or Risk Assessor shall perform HUD lead inspections associated with lead paint risk assessments in Child Occupied/Target Housing.
- EHSO or an EPA-accredited Lead Inspector or Risk Assessor can perform testing of painted surfaces to determine lead content for demolition and renovation projects within dormitory apartments, child-occupied facilities, target housing, or non-regulated buildings.

3.3 Project Oversight

EHSO recommends the use of accredited contractors and personnel in unregulated renovation projects involving the disturbance of lead-based paint. Oversight of lead paint activities will be performed by the following personnel:

- EHSO or an accredited environmental consultant for unregulated renovation projects involving the disturbance of lead-based paint.
- Accredited personnel will be used to perform activities that impact lead painted components within target housing and child-occupied housing.

3.4 Waste Disposal

- Lead content will be determined by laboratory analysis following EPA Toxicity Characteristic Leaching Procedure (TCLP) for lead (40 CFR 261.24).
- EHSO will coordinate waste disposal of lead-containing materials, as applicable.

4.0 References

- Occupational Safety and Health Administration 29 CFR 1910.1025 – Toxic and Hazardous Substances, Lead
- Occupational Safety and Health Administration 29 CFR 1926.62 – Occupational Health and Environmental Controls, Lead
- Environmental Protection Agency 40 CFR Part 745 – Lead; Renovation, Repair, and Painting Program
- Department of Housing & Urban Development (HUD), The Housing and Community Act of 1992 (Public Law 102-550); Title X, The Residential Lead-Based Paint Hazard Reduction Act of 1992
- Environmental Protection Agency Resource Conservation and Recovery Act (RCRA)
- Environmental Protection Agency Toxic Substances Control Act (TSCA)
- Georgia Department of Natural Resources, Environmental Protection Division, Lead Based Paint Abatement and Certification Rules (Chapter 391-3-24) (GA DNR, EPD)