St. Norbert College

LEAD CONTROL POLICY (29 CFR 1926.62)

---

1. **INTRODUCTION** - St. Norbert College has developed a policy to protect employees from the hazards of lead-based paint. For all buildings built before 1978, St. Norbert College will assume that lead paint is present, unless an inspection report proves otherwise. The main objective of this policy is to ensure that employees are aware of the hazards and use work practices that comply with the OSHA Lead in Construction Standard (29 CFR 1926.62) or, when applicable, the EPA Wisconsin State Reference Chapter DHS 163 (Certification for the Identification, Removal and Reduction of Lead-Based Paint Hazards) when performing tasks that have the potential to disturb lead-based paint.

   The goals of this document are to:

   - Keep exposure to and risks from lead paint or lead containing substances to a minimum.
   - Provide a high quality lead management service oversight.
   - Make our faculty, staff, and contractors aware of the presence of lead containing materials when found and the procedures in place to deal with them.

2. **SCOPE** - This policy applies to all faculty, staff, and any contractors working on St. Norbert College property.

3. **RESPONSIBILITIES** - The Director of Facilities (or their designee) and the Human Resources (HR) Environmental Health and Safety Specialist shall work to identify the locations and conditions of lead containing substances throughout the College. They will also ensure that risks are mitigated and that employees are properly notified and trained on the presence of lead containing substances, on the care and maintenance of PPE to manage lead exposures, and any updates to changes in lead presence.

   Management shall ensure proper PPE is available, that areas requiring PPE are properly posted and that employees are held accountable for abiding by the requirements set forth in this policy.

   Every effort shall be made to utilize engineering or administrative controls to reduce the potential for employee exposure. In the instance when this is not possible, PPE shall be provided to protect the employees. This PPE Policy applies to all faculty, staff, and any contractors working on St. Norbert College property.

   a. **Departments** - Each department manager is responsible for compliance with the criteria set forth in this policy. They must ensure that all elements of this policy and related procedures are implemented and followed.

   b. **Departmental Managers**

i. Implement and enforce PPE requirements within their respective area(s) of responsibility to ensure compliance with all aspects of this policy.

ii. Provide PPE to all applicable employees and communicate the necessary PPE requirements prior to hiring.

iii. Evaluate the workplace to identify substandard or otherwise hazardous conditions, which may require administrative controls, engineering controls, PPE, or any combination thereof as a means to ensure employee health and safety.

iv. Ensure that employees who require PPE receive periodic training including the proper use and limitations of their PPE as it pertains to lead environments.

v. Ensure that all employees understand the job tasks or areas which lead containing materials are located.

vi. Establish and maintain a system, which assures the proper cleaning, maintenance and storage of all PPE.

c. **HR Environmental Health and Safety Specialist**

i. Review changes in operations and keep current with new processes and/or facilities within the College and identify new lead-related requirements, when needed.

ii. Work with managers and coordinate efforts to analyze, minimize occupational exposures.

iii. Document and maintain training records.

iv. Undertake the required reporting, investigation and administration of any lead-related exposure induced occupational diseases or conditions.

v. Ensure that hazard assessments have been completed to determine exposure potential and type of PPE, if any, to be used.

vi. Hazard assessments must be certified, signed, dated, and maintained in the Human Resources Department.

d. **Employees -** Employees involved in operations that may disturb or cause to be disturbed any lead based products must:

i. Take part in all mandatory training associated with asbestos familiarization as well as to work in such a manner which reduces the possibility of damaging or disturbing lead containing materials.

ii. Use PPE as instructed and in accordance with training received.

iii. Maintain PPE and report any damage or loss to supervisor or manager.

4. **PROCEDURES**

a. **Training -** Training programs for employees potentially exposed to asbestos containing materials must include:

i. Lead recognition and uses

ii. Health Effects

iii. Potential Locations

iv. Who is potentially at risk

v. Protection against lead containing materials

vi. Controlling lead exposures-limiting environments

b. **Procedures/Course of Action Required -** All lead containing materials will be maintained in a sealed and safe condition or will be removed as part of an on-going maintenance program.

All work areas where there is the potential for lead paint or other lead containing materials based on the age of the area and building materials will be presumed to be positive or tested to determine if lead is present. For large projects, a lead survey or inspection will be done by a certified environmental firm as part of the overall hazardous materials survey prior to construction activities. For small projects, trained College employees can test surfaces to be disturbed with EPA-approved lead test kits.

OSHA has established a permissible exposure limit (PEL) of 50 µg/m3 (50 micrograms of lead per cubic meter of air) averaged over an eight-hour period. The established action level is 30 µg/m3, and is the level at which compliance with the OSHA 29 CFR 1926.62 Lead in Construction Standard is required. The following table indicates the anticipated exposure levels of some common construction activities. Trained St. Norbert College employees are only authorized to perform tasks listed in the left column of the table. St. Norbert College employees are not authorized to perform tasks for which lead exposure is presumed to be greater than 500 µg/m3 because this level of exposure would exceed the protection factor of a half-face negative pressure air-purifying respirator. Controls will be implemented to ensure that employees are not exposed to lead at this level. Wet methods must be used for all demolition, scraping, and sanding operations involving lead paint.

Below (**Table 1**) displays the inherent and presumed lead-based exposure levels correlated to specific work activities.

Table 1-Presumed activities exposures-Lead

LEAD-RELATED CONSTRUCTION TASKS--PRESUMED 8-HOUR TWA EXPOSURE LEVELS		
> 50 TO 500 MG/M³	**> 500 MG/M³ TO 2,500 MG/M³**	**> 2,500 MG/M³**
Manual demolition	Using lead-containing mortar	Abrasive blashing
Dry manual scraping	Lead burning	Welding
Dry manual sanding	Rivet busting	Torch cutting
Heat gun use	Power tool cleaning without dust collection systems	Torch burning
Power tool cleaning with dust collection systems	Cleanup of dry expendable abrasive blasting jobs	
Spray painting with lead paint	Abrasive blasting enclosure movement and removal	
Sorce: OSHA Technical Manual Section V: Chapter 3, CONTROLLING LEAD EXPOSURES IN THE CONSTRUCTION INDUSTRY: ENGINEERING AND WORK PRACTICE CONTROLS		

c. **Exposure Assessment -** To confirm that employees will not be exposed to the 8-hour time weighted average action level of 30 µg/m3, personal air monitoring will be conducted for operations lasting more than two hours that have the potential to disturb lead paint. These personal air samples will be analyzed by a certified laboratory to determine if any employee may be exposed to lead at or above the action level. Samples will be collected in such a way that they are representative of a full shift and include at least one sample for each job classification in each work area either for each shift or for the shift with the highest exposure level.

   For those tasks lasting two or more hours, until we have documentation that employee exposure is not above the action level, employees are required to wear PPE. Employees must wear half or full-face respirators. OSHA requires that coveralls or similar full-body work clothing, gloves, head covering, and disposable shoe coverlets be provided in a clean and dry condition at least weekly. OSHA requires that this PPE be provided daily when employees are exposed to lead at levels over 200 µg/m3. PPE will be made available to all employees performing tasks that disturb lead.

d. **Negative Initial Determination -** When sampling results indicate that employees are not exposed to airborne lead concentrations at or above the action level, a written record will be made. This record will include:

   i. the date of the determination;

ii. location within the worksite;

iii. the name and employee identification number of each employee monitored;

iv. any information, observations, or calculations that would indicate employee exposure to lead;

v. any previous measurements of airborne lead;

vi. and any employee symptoms that may be attributable to exposure to lead.

Monitoring results will be provided to employees no later than five working days after receipt, upon request. As long as sampling data was taken within the past twelve months, monitoring requirements of the OSHA standard are fulfilled, except as noted in this policy's section "Additional Exposure Assessments." This record will be written by the HR Environmental Health and Safety Specialist and kept on file in the Human Resources Department.

e. **Positive Initial Determination -** When sampling results indicate that employee exposure is at or above the action level, but at or below the PEL, air monitoring will be conducted at least every six months. Monitoring will continue until at least two consecutive measurements, taken at least seven days apart, indicate exposure is below the action level. At that time, monitoring will be discontinued, except as noted in the section "Additional Exposure Assessments" of this policy. Results will be provided to employees no later than five working days, upon request.

When sampling results indicate that employee exposure is above the PEL, monitoring will be conducted at least every three months. Monitoring will continue until at least two consecutive measurements, taken at least seven days apart, indicate exposure is below the PEL, but at or above action level. At this time, monitoring will be conducted at least every six months until at least two consecutive measurements, taken at least seven days apart, indicate exposure is below the action level. At that time, monitoring will be discontinued, except as noted in the section "Additional Exposure Assessments" of this policy. Results will be provided to employees no later than five working days, upon request. When exposure is at or above the PEL, a statement will be included on the results notifying that the exposure was at or above the PEL and of the corrective action to be taken to reduce exposure.

Since most College operations do not normally last a duration of six months or longer, the facilities and grounds manager and HR Environmental Health and Safety Specialist will collaborate to determine sampling schedules to ensure that we have current data that is representative of specific work activities. These records will be kept on file in the Human Resources Department.

f. **Additional Exposure Assessments -** Whenever there is a change of equipment, process, control, personnel, or a new task has been initiated that may result in additional

employees being exposed to lead at or above the action level or may result in employees already exposed at or above the action level being exposed above the PEL, additional monitoring will be conducted.

g. **Residential, School, and Child Care Facility Additional Requirements -** The EPA Renovation, Repair, and Painting (RRP) rule, effective 4/22/10, requires that contractors performing renovation, repair, and painting projects that disturb lead-based paint in homes and child-occupied facilities (includes day care centers and schools occupied by children under 6) built before 1978 must be certified and must follow specific work practices to prevent lead contamination. For those occupancies, unless the repairs meet the definition of a minor repair, the work must be performed by a licensed lead abatement or certified lead-safe renovation contractor, unless testing determines lead is not present. The College has identified the following properties maintained by facilities and grounds for which the RRP rule applies:

   i. Special Circumstance: Sensenbrenner Hall-lower level: Children's Center (120 Marsh Street

   ii. The following minor repairs or maintenance activities are not covered by the rule:

      1. activities that disturb 6 square feet or less of paint per room inside

      2. activities that disturb 20 square feet or less on the exterior of a home or building

   Minor repairs and maintenance activities do not include window replacement and projects involving demolition or prohibited practices (burning or torching, sanding, grinding, or other high speed operations).

h. **Requirements for Work Performed by College Employees**

   i. Prior to the start of the work, the Director of Facilities (or their designee) will arrange for determination of the presence of lead. All buildings constructed and/or painted components installed prior to 1978 will be assumed to be positive for lead unless proven otherwise.

   ii. Evaluate the project to determine the appropriate work set up, PPE, identification of safety hazards and proper work practices.

   iii. No one under the age of 18 may disturb (scrape, sand, etc.) lead paint.

   iv. Keep all unauthorized personnel out of the work area.

   v. When required, wear a NIOSH-approved respirator with HEPA filters. Disposable dust masks are not sufficient. **Note:** Individuals wearing respirators must be clean-shaven, and must be trained, have medical clearance, and pass a respirator fit-test, in compliance with the College's Respiratory Protection Policy.

vi. Wear protective clothing, such as full-body coveralls, gloves, and goggles or face shields.

vii. GFCIs are required for all power equipment.

viii. Only HEPA-filtered vacuums are permitted.

ix. Use wet methods, (i.e. misting), to prevent dust generation.

x. When using wet methods, do not create run-off; be aware of slippery conditions and electrical hazards.

xi. Do not use power tools, (grinders, sanders, etc.), unless they are equipped with HEPA vacuum attachments.

xii. Each work area must have a face and hand-wash station.

xiii. Never eat, drink, or smoke in the work area.

xiv. Always wash your hands and face before you eat, drink, or smoke.

xv. Remove PPE and dispose of it at the work site to avoid tracing dust to other areas or your home.

xvi. Follow all requirements listed in this policy and complete the St. Norbert College lead-safe work checklist (see appendix 1).

i. **Indoor Work Practices**

i. Work on only one room at a time.

ii. Clean and remove all items that can be moved out of the work area.

iii. Clean and cover immovable items and floors with plastic and seal with tape.

iv. If applicable, shut down HVAC system, and tape plastic over the vents and grates.

v. Seal off the work area by covering windows and doors with plastic sheets.

vi. Clean the work area completely at the end of each day and vacuum all surfaces with a HEPA-vacuum.

vii. Decontaminate all tools and equipment before removing them from the work area.

viii. Plastic sheeting and disposable tarps should be misted, folded inward, put into plastic bags, and sealed with tape.

ix. When the job is completely done, clean the entire work area by HEPA-vacuuming, then wet-wiping, and then HEPA-vacuuming again.

x. Mop buckets must be emptied into toilets or utility sinks only. Do not empty buckets of wash water into public sinks or floor drains.

xi. Wash your hands.

j. **Outdoor Work Practices (when disturbing more than 20 square feet)**

i. Close all doors and windows within 20 feet of the work area.

ii. Pre-clean the ground, (i.e. remove visible paint chips/debris), then cover with a tarp/drop cloth and secure it to the building with tape or staples to catch any falling dust and debris. Tarps must extend a minimum of 10 feet out for a 1-story building and must extend an additional 5 feet out per story or as far as feasible to sufficiently catch falling paint chips and debris.

iii. Cover nearby plants, sandboxes, play equipment, outdoor furniture, etc.

iv. Do not work on windy days.

v. Follow all ladder safety procedures and check for power lines and other electrical hazards.

vi. Call Diggers Hotline 811 or 1-800-242-8511 at least 72 hours prior to any digging and excavation work. Indicate the digging site with spray paint or other marker prior to contacting.

vii. Clean the work area completely at the end of each day and vacuum all surfaces, (window sills, stairs, tarps, etc.), with a HEPA vacuum.

viii. Decontaminate all tools and equipment before removing them from the work area.

ix. At the end of each workday, and when the job is completely done, clean the work area by HEPA-vacuuming all visible paint chips and debris.

x. Reusable tarps should be folded inward and stored in plastic, taped bags.

xi. Wash your hands.

k. **Waste Management -** All lead paint chips must be collected in a DOT-approved container. The container should be labeled with a hazardous waste label that should list "lead paint chips" as the waste name, "lead" as the ingredient, and "toxic" as the hazard.

In non-residential areas, lead paint debris, such as architectural building components, (i.e. doors, window frames, painted wood, etc.), dust and sludge must be analyzed by a certified laboratory using Toxicity Characteristic Leaching Procedure (TCLP). If the

results from a representative sample of the waste stream exceed the regulatory limit of 5 mg/L of lead in the waste leachate then the waste must be managed and disposed of as hazardous.

Waste generated from work in residential areas should be collected in plastic bags and can be disposed of as household trash in a municipal solid waste landfill or municipal solid waste combustor, in accordance with Massachusetts DEP regulation 310 CMR 30.104 and the USEPA memorandum "Regulatory Status of Waste Generated by Contractors and Residents from Lead-Based Paint Activities Conducted in Households."

l. **Respirators -** Respirators will be provided upon employee request, provided that the employee is, or becomes, an authorized respirator user under the St. Norbert College Respiratory Protection Policy. Respirators are required when an employee's exposure to lead is at or exceeds the PEL or when performing tasks for which do not have a negative exposure assessment. St. Norbert College employees are not anticipated to perform tasks that will exceed the PEL; however, in the event that this becomes necessary, respirators will be required in accordance with the OSHA standard.

5. **POLICY EVALUATION -** The HR Environmental Health and Safety Specialist will conduct periodic evaluations of the workplace to ensure that the provisions of this policy are being implemented. The evaluation will include regular consultations with employees who work on and/or around Lead-based environments and their supervisors, site inspections and review of records. Identified problems will be noted and addressed by the HR Environmental Health and Safety Specialist. These findings will be reported to management, and the report will list plans to correct deficiencies in the specific notated issue and target dates for the implementations of those corrections.

6. **DOCUMENTATION AND RECORDKEEPING -** Copies of training will be retained. These records will be updated as new employees are trained and as existing employees receive refresher training. Training records shall be maintained at the affected department and in the Human Resources Department.

   Records of lead paint abatements, lead-safe renovations, inspections, testing and sampling, letters of compliance, employee training records, and air monitoring data will be kept by the HR Environmental Health and Safety Specialist.

7. **POLICY REVIEW AND UPDATE -** This policy shall be reviewed and updated on an annual basis or sooner if necessary.

Date	Update or Revision	By Whom
2/8/18	Initial Policy Creation	M. Eddy
6/22/18	Applied recommendations by E. Jahnke	M. Eddy

Appendix A **St. Norbert College Lead-Safe Work Checklist**

Date(s) of Project:_____

Project Location/Description:_____

Employee(s) Assigned to Project:_____

Check off to verify the following or write "N/A," if not applicable:

PROJECT TYPE:

☐ OSHA Lead in Construction Standard applies: work where lead paint is present, but the work site is not pre-1978 housing or a child occupied facility; Or work is classified as minor repair and maintenance activity (less than 6 SF on interior surfaces or less than 20 SF on exterior surfaces per project) in pre-1978 housing and child-occupied facilities.

TRAINING:

☐ All employees have attended St. Norbert College in-house Lead Paint Safety training (applies to all projects).

NOTIFICATION:

☐ Facilities & Grounds has developed a work plan and received approval from the HR Environmental Health and Safety Specialist.

PRE-WORK SET UP:

☐ Post warning signs at all approaches to work area.

☐ Use caution tape or other barrier to establish a 20-foot perimeter around exterior work area.

☐ Hand-wash station set up with disposable pre-moistened hand wipes.

☐ Personal air monitoring equipment and Personal Air Sampling Worksheet on site and ready for use.

☐ Personal Protective Equipment (PPE) consisting of disposable coveralls with hoods, safety glasses, gloves, shoe covers and respirators to be worn by all workers.

☐ Objects removed from work area (6-foot perimeter for interior, 20-foot perimeter for exterior work); Immovable objects covered with plastic and sealed.

☐ HVAC system in interior work area shut down; Vents covered and sealed.

☐ Shut doors and windows in interior work area (6’ perimeter), cover with plastic and seal.

☐ Shut doors and windows in exterior work area (20’ perimeter) and keep closed during work.

☐ Cover interior work area entrance/exit door with plastic with weighted flap to keep contamination from spreading beyond the work area and install tack-pad to step on.

☐ Cover floors in interior work area with plastic sheeting, secure to wall and seal edges. Must cover 6’ perimeter or longer if needed to adequately contain dust and debris.

☐ Cover ground, plants and shrubs for exterior work with tarps or plastic that is anchored to the building and weighed down by heavy objects. Cover must extend a minimum of 10 feet on all sides, or longer if needed to adequately capture dust and debris.

WORK:

☐ Place all necessary tools and equipment on plastic sheeting or exterior tarp prior to starting work. (Power sanders, grinders or other power tools cannot be used, unless equipped with a HEPA-vacuum attachment).

☐ Work area to be properly contained, inspected and maintained to ensure dust and debris are not spread outside work area. Exterior work on windy days is prohibited.

☐ Wet methods must be used with scraping, sanding, drilling, cutting or any dust-making activity (except within 1 foot of electrical outlets).

☐ Waste must be put in leak-tight bags or containers or securely wrapped and sealed. HEPA-vacuum and wipe down waste bags before removing from the work area.

☐ Residential waste: can be disposed of as trash or regular construction debris.

☐ Non-Residential waste: must be containerized and stored in a secure area, until laboratory TCLP analysis determines if it must be disposed of as hazardous waste.

☐ Tools and equipment must be thoroughly decontaminated before removal from work area.

☐ Plastic sheeting used for containment and covering objects must be misted, folded inward and taped for disposal. (Plastic sheeting that separates interior work area from other areas must remain in place until final cleaning is complete and verified).

☐ Tarps used for exterior work must be HEPA-vacuumed, folded dirty side inward and stored in plastic bags for future use. (Reusable tarps used for exterior work can never be used for interior

work).

☐ Cleanup (interior): Horizontal surfaces cleaned by HEPA- vacuuming followed by wet-wiping with water/detergent solution; Vertical surfaces cleaned by HEPA-vacuum; Carpets HEPA-vacuumed with a beater-bar attachment.

☐ Cleanup (exterior): HEPA-vacuum all visible paint chips, dust and debris.

☐ Remove coveralls and shoe covers before exiting the work area, wet-wipe shoes and step on tack-pad before walking around outside the work area.

POST WORK:

☐ Cleaning Verification of Window Sills (interior): Wipe each window sill in work area with a wet disposable cloth (use a separate cloth for each sill) and compare to the EPA Post-Renovation Cleaning Verification Card (pgs. 25 & 26) – If it matches or is lighter than the card, it passes; If it does not pass, re-clean and repeat verification; If the second cloth does not pass, wait for 1 hour until the surface is dry, then wipe the surface with a dry electrostatic cleaning cloth. The cleaning verification procedure is now complete

☐ Cleaning Verification of Horizontal Surfaces (interior): Wipe each countertop, shelf or other horizontal surface in work area with a wet disposable cloth (use one cloth for each 40 SF area) – Follow cleaning verification procedure described previously

☐ Cleaning Verification of Flooring (interior): Wipe uncarpeted flooring in work area with a wet disposable cloth using a device with a handle and head to which the cloth is attached (use a separate cloth for each 40 SF section of floor) – Follow cleaning verification procedure described above

☐ Cleaning Inspection (exterior): Inspect ground and area for paint chips/debris and check exterior sills and ledges for dust and debris

☐ Once interior cleaning verification or exterior visual inspection is complete, the warning signs and barrier tape can be removed

☐ Expiration date of EPA Post-Renovation Cleaning Card (interior work):

☐ Submit this checklist, personal air monitoring data and all other documentation to EH&S

Comments:_____ (continue on reverse)

Project Supervisor:_____ Date:_____