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1. Purpose

University of Alaska Anchorage (UAA) employees, student workers, faculty, staff, and outside contractors whose job requires them to disturb painted surfaces. Lead based paint (LBP) was commonly used prior to 1978. All surfaces painted prior to 1978 should be assumed to contain lead unless otherwise tested. Working with LBP can lead to unsafe exposures to lead. 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.

2. Objective

UAA, in its continuing effort to provide employees with safe, healthful working conditions, and to comply with the Occupational Safety and Health Act (OSHA) is implementing the following program for LBP safety to protect people working at the University, by helping employees, student workers, faculty, staff, and outside contractors better understand the risks of working LBP and the procedures required to prevent exposure.

3. Scope

This program applies to UAA employees, student employees, faculty, staff, and outside contractors working on pre-1978 painted surfaces.

4. Definitions

Action Level (AL) - The action level is set by OSHA at 30 $\mu\text{g}/\text{m}^2$ over an 8-hour work day. OSHA requires that medical monitoring must be provided to personnel if they have been exposed above the AL for any single day in a calendar year. Medical monitoring is required for all personnel exposed at or above the AL for more than 30 days in any year. This monitoring can include BLL monitoring.

Blood Lead Level (BLL) - The amount of lead in the blood, measured in μg lead per deciliter ($\mu\text{g}/\text{dL}$) of blood. Employees must be removed from any work which exposes them to lead if their BLL is at or above 50 $\mu\text{g}/\text{dL}$. UAA personnel will have ongoing BLL monitoring requirements if they exceed 40 $\mu\text{g}/\text{dL}$.

High Efficiency Particulate Air (HEPA) Filtration System - A filtration system that has the capability of removing up to 99.97% of airborne impurities that are as small as 0.3 microns

Lead Based Paint (LBP) - Paint containing more than 0.5% or 1.0 mg/cm^2 of lead, as determined by laboratory analysis or field detection with an X-Ray Fluorescence (XRF) detector. All pre-1978 painted surfaces are presumed to contain lead unless otherwise tested.

Lead Containing Paint (LCP) - Paint containing any measurable amount of lead (typically set at greater than 0.06 percent lead).

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Permissible Exposure Limit (PEL) - The OSHA established maximum exposure limit for lead is 50 µg/m³ over an 8-hour work shift.

Personal Protective Equipment (PPE) - Equipment worn to minimize exposure to hazards that may cause injury or illness

Toxic Characteristic Leaching Procedure (TCLP) - Soil sample extraction method for chemical analysis employed as an analytical method to simulate leaching through a landfill

X-Ray Fluorescence (XRF) Detector - A non-destructive analytical technique used to determine the elemental composition of materials often used for the detection of lead in paint

5. Authority and Responsibilities

In addition to the roles and responsibilities outlined in the UAA Training Program, the following apply to the LBP Program.

EHS/RM

- Provide program oversight and consultation to UAA personnel regarding potential risks, exposure prevention, and training relating to potential LBP exposures
- Provide support to departments to ensure that all affected personnel and their managers or supervisors receive the necessary training and medical monitoring as related to this program
- Create, track, and/or conduct inspections on painted surfaces where applicable
- Conduct a review of this program annually and updating it as necessary

Supervisor

- Determine if there is a potential for LBP exposure in their department and if necessary, work with EHS/RM to implement the LBP Program
- Identify personnel who are at risk for LBP exposure
- Act as or designate a competent person for the department
- Ensure appropriate tools and personal protective equipment (PPE) are available to affected personnel
- Require affected personnel to wear PPE as outlined in the plan
- Ensure personnel are properly trained in this LBP Program and the use of tools and equipment in their work areas

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Department Safety Coordinator

- Assist in the identification of LBP exposures within the department
- Conduct period inspections of work involving LBP/LCP exposures within the department to ensure compliance with the Program
- Assist in the determination of safe methods for LBP/LCP work when required

Employees/Student Workers

- Observe the procedures and requirements outlined in this program
- Attend training sessions
- Comply with medical surveillance requirements
- Wear respiratory protection, and other required personal protective equipment (PPE) such as full Tyvek suit, disposable gloves, and safety glasses
- Notify supervisors of changes in the workplace that could cause an increase in exposures to LBP/LCP

Outside Contractors

- Perform all work in compliance with their company's LBP/LCP program, which will be reviewed and approved by the EHS/RM department
- If the company does not have a program, they must comply with this program

6. Hazards Associated with LBP/LCP

The following hazards associated with LBP/LCP exposure can lead to personal injury or death:

- Lead poisonings can damage the brain, liver, kidneys, and red blood cells
- Lead can also damage the reproductive system and central nervous system
- Children, because they are growing and developing their central nervous system, are particularly susceptible to the effects of lead exposures. Lead can be brought home from the jobsite to families when proper hygiene steps are not followed during LBP/LCP work

7. Engineering Controls

Engineering controls are design plans or changes to the working environment to prevent or reduce personnel exposure to potential fall hazards. The following example of engineering controls should be considered in area design to reduce the risk of exposure from work involving LBP/LCP.

- Using HEPA filtration systems when working on LBP/LCP

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- Utilizing a tool-specific shroud with a HEPA filtration system when working with LBP/LCP
- Installing isolation barriers to prevent exposure to the public at large when working with LBP/LCP

8. Administrative Controls

Administrative controls are safe work practices and procedures designed to reduce the risks associated with working with LBP/LCP. Examples of administrative controls include the following:

- Train personnel who work with LBP
- Routine inspections of LBP surfaces to ensure they are intact and in good condition
- Immediate stabilization or removal of peeling or flaking LBP

9. Procedures for Family Housing

The following procedures apply for pre-1978 family housing:

Determining the Presence of LBP

- Facilities Planning and Construction or Facilities Maintenance and Operations departments shall identify the use of lead-based paint on interior and/or exterior surfaces of the buildings in pre-1978 residences by interviewing personnel who may have prior knowledge and review of written records of paint use and purchases.
- If the presence of lead-based paint is confirmed or there is a lack of information regarding the property, a visual inspection of the property will be conducted to document the condition of the interior and exterior surfaces. Documentation shall be provided to EHS/RM.
- Yearly inspections of the property will occur until the property is sold or documentation exists indicating the absence of lead-based paint.

Disclosure Process

- UAA shall disclose all known information (including copies of survey reports and laboratory analysis) regarding lead-based paint hazards in properties leased, sold, or renovated by UAA using the lead-based paint disclosure form (Appendix A) to be signed by the renter or purchaser.
- Disclosure forms shall be maintained for as long as the rental agreement is active and for a minimum of 3 years after the rental agreement is terminated. Disclosure forms for properties renovated or sold by UAA shall be maintained for a minimum of 3 years.

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- UAA shall provide purchasers or lessees with copies of the EPA pamphlet titled “Protect Your Family from Lead in Your Home.” (<http://www.epa.gov/lead/pubs/leadpdf.pdf>) (Appendix B)

Renovation Projects

UAA renovation projects in pre-1978 family housing will adhere to the following guidelines:

- Prior to the work, provide the pamphlet titled “Protect Your Family from Lead in Your Home” (Appendix B) and obtain signature of adult occupant or attempted delivery on the acknowledgement form (Appendix C)
- Conduct the renovation work or paint over the existing surface as long as the existing painted surface is in good condition (not flaking or falling off the wall) and the workers/contractors are not planning to use “abrasive” work practices or surface preparation methods (ex. scraping, sanding, etc.).
- Retain a Certified Lead Inspector/Risk Assessor to test the paint prior to the renovation activities if the workers/contractors will be using abrasive work practices/surface preparation or if the existing painted surface is not in good condition (flaking, peeling, or otherwise in poor condition).

The Lead Inspector/Assessor should determine if the LBP must be removed, or if other control methods such as worker PPE are appropriate to prevent harmful exposures to renovation workers or the facility environment.

For certain minor “spot” renovations or repairs (less than 2 square feet), safe work practices such as personnel lead exposure awareness training, PPE and containment methods may be used in lieu of detailed risk assessment and abatement procedures by certified personnel.

10. All other facilities on campus

All surfaces painted before 1978 will be presumed to contain lead. Testing can be performed by a Certified Lead Inspector.

11. Disposal of LBP

All LBP containing waste must be properly characterized and disposed of in accordance with local, state, and federal regulations. (40 CFR 261.3, 261.24, 262.40 (c)). A representative sample of waste must be submitted to a laboratory for Toxic Characteristic Leaching Procedure (TCLP) testing. If the debris contains more than 5 ppm of lead by TCLP, the debris must be disposed of as

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characteristic hazardous waste.

12. Training

UAA shall provide a training program for all personnel whose work impacts LBP/LCP.

The program shall enable personnel to recognize hazards related to lead exposure from painted surfaces.

The employer shall ensure that personnel have been trained by a competent person in the following areas, as applicable:

- The hazards of lead in the workplace
- Where lead is found within the workplace
- How lead enters the body
- Health effects related to overexposure
- OSHA regulations and PEL/AL
- Practices for measuring lead including air monitoring
- Medical monitoring and medical removal programs
- Basic record keeping requirements
- Safe work practices
- Practices to limit lead exposure
- PPE use including protective clothing and respiratory protection

Retraining shall be provided for all affected personnel annually, new workplace hazards are identified, a near loss incident has occurred, or there are changes in work practices, so that the personnel maintains the understanding and knowledge acquired through compliance with this section.

13. Program Evaluation

The LBP/LCP Program shall be evaluated on an annual basis utilizing the protocols set forth by EHS/RM. The evaluation team will consist of a department safety coordinator and a designee from EHS/RM. EHS/RM will define the scope of the evaluation. The final report will be developed by the EHS/RM utilizing the information received during the evaluation. The deficiencies determined

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in the report will be documented and corrective action plans will be developed.

14. References

OSHA regulations that apply to LBP/LCP safety are included below.

- 29 CFR 1910.1025
- 29 CFR 1926.62

15. Revision History

Revision Number	Date Revised	Description of Change	Revised By	Approved By
0		Initial Issue		
1				
2				
3				

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Appendix A: LBP Disclosure Form Disclosure of Information on Lead-Based Paint and/or Lead-Based Paint Hazards

Lead Warning Statement

Housing built before 1978 may contain lead-based paint. Lead from paint, paint chips, and dust can pose health hazards if not managed properly. Lead exposure is especially harmful to young children and pregnant women. Before renting pre-1978 housing, lessors must disclose the presence of known lead-based paint and/or lead-based paint hazards in the dwelling. Lessees must also receive a federally approved pamphlet on lead poisoning prevention.

Lessor's Disclosure

- A. Presence of lead-based paint and/or lead-based paint hazards (check (i) or (ii) below)
- i. _____ Known lead-based paint and/or lead-based paint hazards are present in the housing explain)._____
 - ii. _____ Lessor has no knowledge of lead-based paint and/or lead-based paint hazard in the housing.
- B. Records and reports available to the lessor (check (i) or (ii) below)
- i. _____ Lessor has provided the lessee with all available records and reports pertaining to lead-based paint and/or lead-based paint hazards in the housing (list documents below)._____
 - ii. _____ Lessor has no knowledge of lead-based paint and/or lead-based paint hazard in the housing.

Lessee's Acknowledgment (initial)

- C. _____ Lessee has received copies of all information listed above.
- D. _____ Lessee has received the pamphlet Protect Your Family from Lead in Your Home.

The following parties have reviewed the information above and certify, to the best of their knowledge, that the information they have provided is true and accurate.

_____	_____	_____	_____
Lessor	Date	Lessee	Date

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Appendix B – Protect Your Family from Lead in Your Home – EPA



LBP-AppendixB.pdf

(PDF)

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Appendix C: LBP Renovation Acknowledgement and Certification

This document has been created for compliance with the requirements of the Federal Lead-Based Paint, Renovation, Repair, and Painting Program.

Occupant Confirmation

Pamphlet Receipt

_____ I have received a copy of the lead hazard information pamphlet informing me of the potential risk of the lead hazard exposure from renovation activity to be performed in my dwelling unit. I received this pamphlet before the work began.

Printed name of Owner/Occupant

Signature of Owner/Occupant

Signature Date

Renovator's Self Certification Option (for tenant-occupied dwellings only)

Instructions to Renovator: If the lead hazard information pamphlet was delivered but a tenant signature was not obtainable, you may check the appropriate box below.

_____ **Declined** – I certify that I have made a good faith effort to deliver the lead hazard information pamphlet to the rental dwelling unit listed below at the date and time indicated and that the occupant declined to sign the confirmation of receipt. I further certify that I have left a copy of the pamphlet at the unit with the occupant.

_____ **Unavailable for signature** – I certify that I have made a good faith effort to deliver the lead hazard information pamphlet to the rental dwelling unit listed below and that the occupant was unavailable to sign the confirmation of receipt. I further certify that I have left a copy of the pamphlet at the unit by sliding it under the door or by _____ (fill in how pamphlet was left).

Printed name of Person Certifying Delivery

Attempted Delivery Date

Signature of Person Certifying Lead Pamphlet Delivery

Unit Address