Safety & Risk Management Policies and Procedures

Title: Lead Management Policy
Date: October 2013

Rationale: As lead is a hazardous material, it is important to provide Southwestern University employees with instructions on how to safely handle and dispose of lead containing materials.

Goals: The purpose of this written program is to provide protection to all employees engaged in work that may expose them to lead hazards and to eliminate lead poisoning in construction and maintenance related work as well as to the general public.

Policy and Procedure: The Lead Management Policy and Procedure includes information regarding the following:

- An introduction that covers how lead may be ingested into the body and the responsibilities of project supervisors.
- How to test a material to determine if it is indeed lead.
- A site specific lead compliance plan.
- Information on how to properly provide medical care and dispose of lead.

Lead Management Policy and Procedure

Introduction:

Exposure to lead can occur when workers inhale or ingest lead dust or fumes during construction activities including, but not limited to:

- Demolition, renovation, or repair of surfaces or materials containing lead (including painting and decorating).
- In particular, the use of abrasive blasting, mechanical or manual sanding, manual scraping, manual demolition of structures, heat gun applications, power tool cleaning, welding, cutting and torch burning are covered by this program as well as the OSHA - Lead in Construction Standard 29 CFR1926.62.

The purpose of this program will be accomplished by:

- Providing formal classroom education/training, site specific instruction by supervisors, establishing and following safe work practices, establishing a medical surveillance program, and comprehensive supervisor oversight to ensure components of this program are met.

Supervisors & project managers should continuously communicate their expectation of the importance of lead poisoning prevention and monitor work to ensure it is conducted in compliance with this program.

Identification of Lead Hazard: Lead Survey

You should test for lead prior to any task activities (demolition, renovation, surface preparation, sand blasting, sanding, manual scraping, heat guns, power tool cleaning, welding, and cutting).

- Paint/window caulk/glaze, other materials should be:

    1. Tested for lead content – Request a survey via a work order from the Safety Office.
        a. TDH > 0.5 % - Proceed using lead compliance plan.
        b. TDH < 0.5 % - Proceed with caution – Review the hazard based on amount of dust potential (example: If sanding and/or torching it is recommended to use the lead compliance plan)
        c. < 0.01 – May use normal construction techniques
    2. Assumed to contain lead - Survey is not required (time limitation, small scope)
        a. Proceed using the lead compliance plan and safe work practices.

Assign Competent Person:

- The competent person is one who is capable of identifying existing and predictable lead hazards in their surroundings or working conditions **and** who has authorization to take prompt corrective measures to eliminate them.
- The competent person is responsible to follow this written program and **complete a site specific compliance plan** for all work covered under this program. Supervisors are

responsible to ensure components of this plan are being met regardless of the assignment of the competent person to a trained and experienced employee.

Site Specific Lead Compliance Plan:
Supervisors assigning work for projects, work orders, or tasks that involve the potential for lead exposure shall ensure that our **lead compliance plan** (form) is used on site, employees are following proper work practices, and the completed plan is filed.

- This involves:
    1. Identification of potential lead hazards.
    2. Safe work practices (lead warning signs, barrier tape if indoors or where pedestrians could be exposed).
    3. Control of lead chips/dust. Use a drop cloth, poly tent, source ventilation, etc.
    4. Use of respiratory protection and personal protective equipment (coveralls).
    5. Proper hygiene prior to all breaks (hand and face washing) and proper cleaning of work clothing.
    6. Proper cleanup of lead dust/paint chips (wet clean/HEPA vacuum).

Medical Monitoring Program:

- **Initial Medical Surveillance**:
  [Biological monitoring - blood lead level & ZPP] -
  Southwestern University will arrange for medical services using Concentra Medical Center to provide initial medical surveillance to any worker occupationally exposed to lead at or above the action level of 30 ug/m3 **at no cost to the employee**.

- **Medical Surveillance Program:**
  Southwestern University shall set up and maintain a medical surveillance program for all employees who are or may be exposed to lead at or above the action level for more than thirty (30) days in a twelve (12) month period. This program shall meet the requirements in 29 CFR 1926.62 (j), (k) (Physical exam and medical/work history).

- **Employees** in this program shall participate in biological monitoring.

- **Medical Removal:**
  Provisions will be made to remove employees from lead hazards in the working environment if blood lead levels meet or exceed 50 ug/dl per 29 CFR 1926.62 (k)(1)(i). Full benefits will be maintained.

- **Exposure Assessment:**
  Supervisors are responsible for contacting the Safety Office with 3 days' notice prior to starting a project that may expose an employee at or above the OSHA PEL of 50 ug/m3. Personal air monitoring may be conducted and laboratory results with a hazard assessment will be made available to the employee, department, and Human Resources representative to arrange for necessary medical surveillance.

Lead Hazard Training & Information:

- All employees engaged in construction activities that may expose them to lead hazards will be trained in accordance with the requirements of the OSHA lead in construction standard 1926.62 (l). Contact Safety Office to schedule formal classroom training.

- Employees shall receive site specific instruction and a review of the lead compliance plan shall be conducted by supervisors/departments (contact Safety Officer for consultation and assistance).

Clean Up:

- The work area shall be properly cleaned (wet wiped/HEPA vacuumed) and visibly inspected for the presence of lead dust/debris by the competent person before the area is opened to the public.

Lead Based Paint Waste Disposal:

- Lead based paint, caulking, or glazing waste shall be collected at the job site and containerized/stored in a secure, closed, and properly labeled container at Physical Plant.
- TCLP testing will be conducted to determine if lead dust/debris are considered hazardous waste or construction debris. Contact the Safety Office when container is full to arrange sampling and analysis. DO NOT DISPOSE OF IN THE DUMPSTER. If TCLP results > or = 5.0mg/L (5.0ppm) fails TCLP and is considered hazardous waste, then collect a 100 gram representative sample (1 quart Ziploc bag).

Date:

Approved (signature and date):

Supervisor _____

Director of Physical Plant _____

AVP for Facilities _____

Vice President for Fiscal Affairs If needed_____

Copy:

All supervisors _____

Related crafts _____

Department Heads _____ _____

VP's _____ _____

President _____