

# **P-24**

# **Lead**

## **I. Policy**

This program provides the Department of General Services employees with the basic information to provide a safe and healthful procedure to remove or manipulate paint containing lead. Each employee is required to follow the guideline provided within this section. Supervisors shall be responsible for initiating disciplinary action against employees who do not follow the procedures within this section.

## **II. Scope**

These procedures will only apply to exposures below the OSHA action levels for lead. If it is determined that an activity will produce exposures at or above the action level, specific safety procedures will need to be developed as well as additional training and certifications will be required. These procedures also do not apply to lead activities that occur in target housing, daycare facilities or schools.

## **III. References**

- EPA 40 CFR Part 745 Lead; Renovation, Repair, and Painting Program; Lead Hazard Information Pamphlet; Notice of Availability; Final Rule
- Occupational Safety and Health Administration (OSHA) Standards  
OSHA 29 CFR 1926. 62 lead

## **IV. Definitions**

Action Level - is a specific level of exposure where the employer is required to provide further training, equipment and employee medical monitoring.

Best work practices - procedures that have been determined to be optimal to reduce the hazard exposures to the employee.

CONSTRUCTION, DEMOLITION, & LAND-CLEARING DEBRIS LANDFILL, a.k.a., "C&D Landfill" - A landfill that accepts certain construction & demolition debris, land-clearing debris & yard trash. These landfills can NOT accept waste painted with lead-based paint.

Impacting Paint containing lead - any work that disturbs any paint containing lead on any surface; including, but not limited to,; scraping, cutting, sanding, grinding, peeling, heating welding, brazing.

Lead awareness training - required annual training for any employee that is expected to impact paint that contains lead.

Lead Based paint - any paint that has more than 1% lead.

MUNICIPAL SOLID WASTE LANDFILL (MSWLF) - A lined landfill with a leachate collection system & ground water monitoring that accepts municipal solid waste (garbage). These landfills can accept waste painted with lead-based paint.

OSHA Action Level - the Action Level as defined by OSHA is 30 micrograms per cubic meter of air 8 Hour TWA.

OSHA P.E.L. - Permissible Exposure Limit is defined by OSHA as 50 micrograms per cubic meter of air 8 Hour TWA. The PEL is where the employees must wear the appropriate PPE and participate in the Medical monitoring program as well as maintain certain training/certifications.

PPE - Personal Protective equipment.

Paint containing Lead - Painted surfaces that has any amount of measurable lead.

Target housing - any facility that houses a child 6 years old or less for more than 60 hours a year.

## **V. RESPONSIBILITIES**

### **Safety Coordinator**

The Safety Coordinator has the responsibility to:

- Maintain and update this written program.
- Ensure that all elements of the program are implemented completely for the protection of all employees.
- Ensure that the applicable training is provided to the employees that are expected to impact paint containing lead.
- Ensure that characterization personal air samples are conducted for each activity annually.
- Test, or if necessary arrange testing, of any suspected paint for lead content.

### **Section Chiefs/Supervisors/Managers**

The Section Chiefs/Supervisors/Managers have the responsibility to:

- Ensure that any employee that is expected to impact paint containing lead receive the lead awareness training.
- Ensure that all jobs impacting paint containing lead is within the limitations of the employees training.
- Ensure that no paint containing lead is impacted with in any of the daycare facilities or target housing.

### **Employee Responsibility**

Employees have the responsibility to:

- Comply with all General Services Safety rules and regulations concerning lead hygiene.
- Perform all tasks following the “best work practices” as detailed: in this procedure, Lead awareness training and in the characterization(s).
- Cooperate with the safety personnel when personal air samples are conducted.
- Contact their supervisor to report any task that would outside the scope of this program.

## **VI. General Program Management**

In any building constructed prior to 1978, any painted surface that may be impacted must be tested or verified to be lead free. If the paint is tested to be positive for lead, the best work practices must be followed to prevent employee exposure and possible contamination of the area. All efforts should be made to reduce the amount of dust created during the paint removal. Manual methods are preferred over mechanical methods (i.e. scraping vs. power sanders)

## **Best work practices for lead paint:**

### **Removal**

All areas where paint chips or dust can fall must be covered by 6 mil or better plastic sheeting, plus (if possible) an additional 6 feet if the removal is to occur indoors, and 10 feet if the removal is to occur outside.

Any employees conducting this work should wear disposable coveralls with booties and disposable gloves.

Only the paint removal methods that have been characterized are allowed to be conducted. There will be no dry scraping, sanding, heating, welding, plasma cutting or other similar activities conducted on paint containing lead.

### **Clean up**

Once all paint has been removed the larger chips will be picked up and placed in a 6 mil poly trash bag. NO DRY SWEEPING.

All dust will be cleaned with a HEPA vacuum.

All plastic sheeting and disposable clothing will be disposed of in a 6 mil poly trash bag. The plastic sheeting cannot be reused. Plus an additional 2 feet of area shall be cleaned.

### **Disposal**

With regard to disposal, all non-hazardous wastes painted with “lead-based paint” are still considered “solid waste” NOT “hazardous wastes.”

All waste paint with paint containing lead may be disposed in dumpsters that are to be picked up and delivered to Municipal Solid Waste Landfill.

When using chemical removal methods all paint and residual chemical is considered hazardous waste and will be disposed of in accordance to DEP and EPA regulations by a certified Hazmat disposal company.

The HEPA Vacuum use for lead paint projects should only be used to vacuum lead paint chips.

#### For Harrisburg operations:

Once the vacuum is full it shall be delivered to the DGS Fire Safety personnel to dispose of the collected material and any necessary service.

#### For areas outside Harrisburg:

Contact Fire Safety for guidance.

## **VII. Respirators (voluntary use)**

Under the scope of the program the use of respirators is voluntary. P-95 respirators/dust masks will be provided to the employee for their use. However, prior to the use of these respirators the employee must read the information in Appendix D.

## **VIII. Employee training**

All employees that are expected to impact paint containing lead will receive annual awareness training to include instruction, testing and a demonstration. This training is to be conducted by a person knowledgeable in lead hygiene.

Anyone that is expected to impact lead paint using methods that have not been characterized must have L&I's lead abatement worker and/or supervisor certification(s), enroll in the DGS respirator program and must have their blood lead levels tested annually.

## **IX. Appendices**

- A. Results of exposure Characterizations**
- B. Training rosters**
- C. Employees that are part of the lead medical surveillance program**
- D. Information for Employees using respirators when not required**

## **Appendix D**

### **Appendix D Information for Employees Using Respirators When Not Required**

Respirators are an effective method of protection against designated hazards when properly selected and worn. Respirator use is encouraged, even when exposures are below the exposure limit, to provide an additional level of comfort and protection for workers. However, if a respirator is used improperly or not kept clean, the respirator itself can become a hazard to the worker. Sometimes, workers may wear respirators to avoid exposures to hazards, even if the amount of hazardous substance does not exceed the limits set by OSHA standards. If your employer provides respirators for your voluntary use you need to take certain precautions to be sure that the respirator itself does not present a hazard.

You should do the following:

1. Read and heed all instructions provided by the manufacturer on use, maintenance, cleaning and care, and warnings regarding the respirators limitations.
2. Choose respirators certified for use to protect against the contaminant of concern. NIOSH, the National Institute for Occupational Safety and Health of the U.S. Department of Health and Human Services, certifies respirators. A label or statement of certification should appear on the respirator or respirator packaging. It will tell you what the respirator is designed for and how much it will protect you.
3. Do not wear your respirator into atmospheres containing contaminants for which your respirator is not designed to protect against. For example, a respirator designed to filter dust particles will not protect you against gases, vapors, or very small solid particles of fumes or smoke.

Keep track of your respirator so that you do not mistakenly use someone else's