

CSU Channel Islands Lead Operations and Maintenance Program

1.0 Policy

It is the policy of California State University Channel Islands to provide employees and visitors with a safe and healthful environment. The primary objective of this program is to prevent exposure to lead. This will be accomplished by minimizing disturbance of lead based paint and following procedures that minimize the release of lead when disturbance of these materials is planned. All lead work will be done in accordance with Occupational Safety and Health Administration (OSHA) standards and other regulatory guidelines. To ensure regulatory compliance with safety, in-house work that may disturb lead-based paint should comply with the provisions of this program.

2.0 Purpose/Scope

2.1 Purpose

This program is intended to prevent exposures to lead contained in lead based paints by:

- minimizing disturbance or damage to lead based paint during normal operations;
- following procedures that minimize lead release when disturbing lead based paint;
- performing exposure assessments for work with lead based paint; and
- properly managing lead waste.

2.2 Scope

This program is intended to address potential occupational exposure to lead when CSU Channel Islands employees conduct construction work. This type of work will be small scale, short duration maintenance, repair, demolition or removal projects involving minor disturbance of lead-based paint.

3.0 Definitions

Action Level: The air borne level of lead that initiates many of the provisions of lead protection regulations. Thirty micrograms per cubic meter, eight-hour Time Weighted Average; (8hr TWA=30mg/m³).

Competent Person: One who is capable of identifying existing and predictable lead hazards in the surroundings or working conditions who has authorization to take prompt corrective measures to eliminate them.

Exposure Assessment: An initial determination of whether any employee's exposure to lead exceeds the action level.

Permissible Exposure Limit: The highest level of lead in air to which an employee may be permissibly exposed over an 8 hour workday: (8 hr TWA = 50 mg/m³).

4.0 References

5.0 Administration and Responsibilities

The intention of this program is to prevent any exposure that might approach the action level for airborne lead. This will be accomplished by performing an exposure assessment, including personal sampling for airborne lead, of predefined work procedures. Only those procedures that produce very low levels of airborne lead, as demonstrated by sampling, will be allowed. Records of air sampling will be maintained and further sampling will be performed when there are changes in work procedures or materials. As long as lead exposures remain below the action level regulatory provisions for medical monitoring, respiratory protection, protective clothing, change areas, etc. will not be required. However, as a matter of good practice, respiratory protection, protective clothing and training will be provided to ensure the lowest exposure achievable.

5.1 Program Manager

- Complete necessary training to comply with federal and state regulations.
- Oversee Competent Person in performing exposure assessments.
- Maintain the Lead Operations and Maintenance Program.
- Maintain an inventory of lead containing materials in facilities.
- Provide employee awareness training.
- Inform Custodial and Maintenance staff about locations of lead and caution them about disturbance or damage.
- Maintain records as required by this program.

5.2 Competent Person

- Complete necessary training to comply with federal and state regulations.
- Confirm lead work is performed in accordance with recommended work procedures and safety practices.
- Perform job site inspections of areas to identify lead based paint.
- Collect paint samples for analysis by a certified laboratory.
- Authorized to take corrective measures to eliminate hazards.
- Perform exposure assessments.
- Review inventory and sampling information available for job sites prior to work.
- Coordinate with Construction Project Managers to facilitate adequate notification to outside contractors of the presence of lead based paint.

5.3 Project Managers

- Provide scope of work to Competent Person prior to start of work.
- Include Competent Person in meetings and job walks.
- Post information at job site.
- Notify Contractor working in areas containing lead based paint of its presence.

5.4 Employees

- Be aware of hazards of lead dust
- Clear any work that may disturb lead based paint with the Competent Person before work begins.
- Report damage of lead based paint to their Supervisor and the Competent Person.

6.0 Notification

University employees, off-campus contractors and lessees must be informed of the presence of lead based paint in University facilities.

7.0 Exposure Assessment

An exposure assessment will be performed to determine if any employee may be exposed at or above the action level of airborne lead. The sample will be representative of an employee's full shift daily exposure to lead. Only specified work procedures will be allowed and air sampling will be performed for all types of procedures used. Exposure assessments will be performed every 12 months for the specific work tasks/employee positions.

Interim Protection:

During any new work process, lead work must necessarily be performed prior to completing the personal sampling and exposure assessment. During this "interim" work the following safety procedures will be implemented:

1. All work will be done by properly trained workers using respiratory protection.
2. Disposable protective coveralls (tyveks) will be required.
3. Protective clothing must be removed prior to leaving the job site.
4. Protective clothing and waste will be managed as if lead contaminated.
5. Workers will be provided facilities for hand washing.
6. Personal monitoring will be performed to demonstrate if work procedures expose employees at lead dust levels exceeding the PEL.

NOTE: Biological monitoring is required if exposure assessments indicate lead dust at concentrations greater than the PEL or excursion limit

8.0 Work Practice Controls

8.1 Prohibitions

Lead based paint should not be pulverized and introduced into ambient air. When materials are disturbed lead should be removed intact, or when necessary, removed by procedures that do not produce dust. Therefore, the following procedures are prohibited from use when removing lead based paint coatings:

1. Abrasive blasting
2. Welding

3. Torching burning or cutting
4. Normal vacuuming of lead dust debris

8.2 Work Practices

1. Respiratory protection will be required when employees disturb lead based paint.
2. Disposable protective coveralls (tyveks) may be required depending on activities.
3. Any activities that generate dust or promote the spread of debris should be minimized.
4. Lead based substrates should be removed intact when possible.
5. When lead based substrates must be blasted, welded, or cut, the lead paint must be removed at that location prior to performing the prohibited processes.
6. The preferred methods for removal of lead based paint are chemical stripping, manual scraping, manual demolition, manual sanding or heat gun.
7. Construction debris containing lead based paint should be maintained intact as much as is feasible.
8. Vacuuming of lead debris is allowed only if the vacuum is equipped with a HEPA filter.
9. All debris must be collected and treated as hazardous waste until a waste determination is made.
10. When lead debris is generated by demolition outdoors it must be contained by use of wetting agents, plastic sheeting, etc. All dust and paint chips should be contained.
11. When lead dust may be generated inside a building all dust must be scrupulously controlled by isolating the dust from any ventilation system, controlling dust through the use of plastic sheet barriers and minimizing dust by the use of wetting agents when possible. Fugitive dust may be easily cleaned through the use of a HEPA filtered vacuum.

9.0 Training

9.1 Workers who will disturb lead will be trained in the following:

Hazards of lead

- Lead as a subsurface
- Uses of lead
- Permissible Exposure Limit (maximum exposure of 50 micrograms per cubic meter over 8-hours) and Action Level for Lead (airborne concentration of 30 micrograms per cubic meters averaged over an eight-hour period).
- Possible routes of exposure
- Health effects

How to avoid hazards

- Specific methods of abatement to be used
- Work practices to minimize exposure
- Protective equipment and clothing
- Importance of personal hygiene

The CSU Channel Islands lead O&M program and employee rights

- Hazard communication
- Exposure monitoring
- Medical surveillance criteria
- Medical removal protection

9.2 Custodial and Maintenance workers

- Hazards of lead
- “Awareness Level” training on the locations of lead
- Work practice prohibitions to avoid lead hazards