18. Lead-Safe Procedures

18.1 Background

On April 22, 2008, the Environmental Protect Agency (EPA) issued a rule requiring the use of lead-safe practices and other actions aimed at preventing lead poisoning. Under the rule, beginning April 2010, contractors performing renovation, repair and painting projects that disturb lead-based paint in homes, child care facilities, and schools built before 1978 must be certified and must follow specific work practices to prevent lead contamination.

The University of Montana (UM) has developed this LEADSAFE Procedures to be strictly followed during a renovation, repair and painting work project on any applicable campus structure (dwellings built before 1978) by all UM maintenance staff and contracted personnel.

18.2 Step one - Planning

1. Determine where lead-based paint (LBP) is present on all campuses. Once this inventory has been set up it will be updated on an annual basis.
   - The inventory will include ALL pre-1978 structures.
   - If available any existing database information will be incorporated into a master database specifically for this LEAD-SAFE procedure.
   - Establish guidelines to determine when size of project warrants implementation of these procedures.
     - EPA notes that “generally, minor repair and maintenance activities (less than 6 square feet per interior room or 20 square feet per external project) are exempt from the work practice requirements. However, this exemption does not apply to jobs involving window replacement or demolition…”
     - Due to the difficulty of determining those dwellings that have or may have in the future any children under 6 or women that are pregnant each building on campus will be treated to the same procedures across campus without regard to occupancy.
     - A master list would be developed and circulated to all departments on campus that may have the need. This would include but not be limited to: Maintenance Shops and Residential Life Shops.
   2. Training – one certified staff member at all times.
      - Have an appropriate number of certified staff available to supervise &/or train others that may be called upon to do this work
        - John Barba from Maintenance Paint Shop has recently been certified.
        - Jerome Steen from Resident Life has recently been certified.
      - Require this certified person train others on campus as appropriate

18.3 Step two – Project set up

1. Pre-Renovation
1. Follow lead-safe work practices (see R, R, P rules)
   a. Separate work area from rest of dwelling;
   b. Protect the work area with plastic sheeting approximately 6 feet in all directions, assuring that all dust and debris generated by the work remains in this enclosed area.
   c. Make sure the necessary supplies and tools are at hand, including appropriate signs, cones, and barrier tape, rope or fencing.
   d. Workers need to make sure they have the appropriate personal protective equipment (PPE), which may include: protective eye wear, painters hat, disposable overalls, disposable N-100 rated respirator, disposable latex/rubber gloves and disposable show covers.
   e. Materials for the job may include: wet-dry sandpaper, sanding sponge; misting bottle or pump sprayer; heavy plastic sheeting; utility knife or scissors; masking tape, duct tape or painters’ tape; High Efficiency Particulate Air (HEPA) vacuum cleaner; heavy duty plastic bags; and tack pads, paper towels, or disposable wipes. Other tools that may be needed: low-temperature heat gum (under 1,100 degrees Fahrenheit); chemical strippers without methylene chloride; power tools with HEPA filter equipped vacuum attachments.
   f. Minimize dust and control the spread of dust.
   g. Prohibited Practices would include: open-flame burning or torching of lead-based paint; use of machines that remove lead-base paint through high speed operation such as sanding, grinding, power planning, abrasive blasting or sandblasting, unless such machines have a HEPA exhaust control; operating a heat gum on lead-base paint at temperature greater than 1,100 degrees Fahrenheit.

2. Leave the work area clean
   i. The area should be completely free of dust and debris.
   ii. Control the waste
   iii. Bag or wrap the waste at the work site and in the work area.

18.5 Step Four - Confirmatory testing

1. It appears from the EPA’s website that the EPA is the process of evaluating test kits and that by September 1, 2010 they will be recognizing new kits (see link: http://www.epa.gov/lead/pubs/overview.htm). Until that time commercially available kits that were recognized by the EPA in the June/July 2009 timeframe can be used.

2. Overall the confirming tests should:
   o Verify work completion with the cleaning verification procedure or clearance.
   o Dust clearance testing (see above); and
Interpret the clearance sampling results
a. Floors: 40 micrograms per square foot
b. Window sills: 250 micrograms per square foot
c. Window troughs: 400 micrograms per square foot
   i. Test with use of wipe rag color chart (as used by Maintenance Paint shop).

18.6 Other Sources
2. www.epa.gov/lead - steps to LEAD SAFE Renovation, Repair and Painting