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 release of lead when disturbance of these materials is planned. All work will be done in accordance with OSHA standards and other regulatory guidelines. To ensure regulatory compliance and 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; first, by minimizing disturbance or damage to lead based paint during normal operations; second, by following procedures that minimize lead release when disturbing lead based paint; third, by exposure assessments for work with lead based paint, and fourth, by proper management of lead waste.

2.2 Scope

This program is intended to address potential occupational exposure to lead when CSUCI 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=30$\mu g / m^3$).

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 $\mu g / m^3$).

4.0 References

4.1 California Code of Regulations, Title 8, sec. 1532.1, Lead in Construction.

4.0 Administration and Responsibilities

The intention of this program is to prevent any exposure that might approach the action level for air borne lead. This will be accomplished by performing an exposure

assessment, including personal sampling for air borne lead, of predefined work procedures. Only those procedures that produce very low levels of air borne 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. Responsibilities of employees follow:

5.1 Program Manager

Perform Exposure Assessments
Maintain the Lead Operations and Maintenance Program.
Maintain an inventory of lead containing materials in facilities.
Ensure that all employees receive training appropriate for their roles in managing lead.
Inform Custodial and Maintenance staff about the locations of lead and caution them about disturbance or damage.
Maintain records as required by this program.

5.2 Competent Person/ O&M program coordinator

Ensure that recommended work procedures and safety practices will be followed before authorizing construction or maintenance work involving lead

5.3 Employees

Staff should clear any work that may disturb lead with the Competent Person before work begins.

6.0 Notification

University employees, off-Campus contractors and lessees must be informed of the presence of lead based paint in 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 for air borne lead. The sample will be representative of an employees full shift daily exposure to lead. Only specified work procedures will be allowed, and all procedures will be sampled.

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 using respiratory protection.
2. Protective coveralls (tyveks) will be required.
3. Protective clothing and waste will be treated as if lead contaminated.
4. Workers will be provided facilities for hand washing.

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 on lead based paint coatings.

1. Abrasive blasting
2. Welding
3. Torch 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. 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 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 can be 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

<u>Hazards of lead</u>

- Lead as a substance
- Uses of lead
- PEL and action level
- Possible routes of exposure
- Health effects

<u>How to avoid hazards</u>

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

The CSUCI lead O&M Program and employee rights

- Hazard Communication Standard
- 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 hazards