

**P-24**

**Lead**

## **I. Policy**

This program provides the Department of General Services (DGS) 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 guidelines 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 Occupational Safety and Health Administration (OSHA) action levels for lead. If it is determined 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.

## **III. References**

- EPA 40 CFR Part 745 Lead; Renovation, Repair, and Painting Program; Lead Hazard Information Pamphlet; Notice of Availability; Final Rule
- [OSHA 29 CFR 1926.62 Lead](#)

## **IV. Definitions**

Action level - a specific level of exposure where the employer is required to provide further training, equipment and employee medical monitoring. The action level for lead is 30 micrograms per cubic meter of air 8 hour TWA.

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

Construction, demolition, and land-clearing debris landfill - A landfill that accepts certain construction and demolition debris, land-clearing debris and 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.

Permissible exposure limit (PEL) - Permissible exposure limit for lead is 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.

## **V. RESPONSIBILITIES**

### **Safety Coordinator**

The Safety Coordinator has the responsibility to:

- Maintain and update this written program.
- Ensure all elements of the program are implemented completely for the protection of all employees.
- Ensure applicable training is provided to employees that are expected to impact paint containing lead.
- 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 any employee that is expected to impact paint containing lead receive the lead awareness training.
- Ensure all jobs impacting paint containing lead is within the limitations of the employees training.
- Ensure no paint containing lead is impacted within any of the daycare facilities.

### **Employee Responsibility**

Employees have the responsibility to:

- Comply with all DGS safety rules and regulations concerning lead hygiene.
- Perform all tasks following the “best work practices” as detailed: in this procedure, and lead awareness training.

- Cooperate with the safety personnel when lead samples are conducted.
- Contact their supervisor to report any task that would be 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 approved by DGS Fire, Safety and Environmental division are allowed to be conducted. There will be no dry scraping, sanding, heating, welding, grinding, 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.

#### **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 a 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 Department of Environmental Protection (DEP) and Environmental Protection Agency (EPA) regulations by a certified Hazmat disposal company.

The high efficiency particulate air (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 and Environmental division personnel to dispose of the collected material and any necessary service.

For areas outside Harrisburg: Contact DGS Fire, Safety and Environmental division personnel for guidance.

## **VII. Employee training**

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