

Tufts University LEAD MANAGEMENT PLAN

1. PURPOSE and APPLICABILITY

1.1

It is the policy of the Tufts University to provide the University community with a safe and healthful environment. This policy is designed to ensure that University employees follow the appropriate procedures to prevent building occupants, visitors, maintenance personnel and contractors from exposure to hazardous levels of lead and lead containing materials including dust, paint chips and fumes.

1.2

This policy applies to all University employees and students involved with, or affected by, activities that may result in the disturbance of lead-containing materials.

2. DEFINITIONS

Accessible, Mouthable Surfaces (AMS)

AMS are surfaces five feet or less from the floor, stair tread or ground that form a protruding corner or similar edge, or protrude ½ inch or more from a flat wall surface. Accessible, mouthable surfaces generally refer to woodwork, and include, but are not limited to, outside corners of walls, doors, doorjambes, door casings, window casings, chair rails, stairs and stair rails, balusters, treads and risers, etc. Latticework on residential premises is considered to be composed of accessible, mouthable surfaces, regardless of the dimensions of the individual lattice strips. The following exterior surfaces are exempted from being considered accessible, mouthable surfaces: round support columns six inches or greater in diameter; all clapboards or shingles; corner boards, drip boards or skirts; masonry surfaces, except masonry windowsills five feet or less from the ground; and asbestos insulation, whether interior or exterior.

Authorized Person means a person who may legally perform an abatement or containment activity for which he or she has received the required training or course of instruction and, as necessary, a certificate or license, all in accordance with the requirements of 105 CMR 460.000, 454 CMR 22.00 and the training materials approved by the Director. See 105 CMR 460.110(C).

Dormitory Apartment

An apartment, located within a dormitory building, occupied by students with children or employees residing with their partners and/or children.

Lead-Based Paint Abatement

Abatement means the removal of paint, plaster or other accessible structural material containing dangerous levels of lead or the replacement of the architectural fixture or element containing paint or other accessible structural material containing dangerous levels of lead.

Lead Paint Activities

With respect to target housing, the term includes risk assessment, inspection and abatement. With respect to a public building - Identification of lead-based paint and

materials containing lead-based paint, deleading and removal or lead activities where the specific purpose of the work is to abate lead-based paint or lead-based paint hazards.

Lead-Based Paint Hazard

A condition that causes exposure to lead from lead-contaminated dust, lead-contaminated soil, or lead-contaminated paint that is deteriorated or present in accessible surfaces, friction surfaces, or impact surfaces that would result in adverse human health effects.

Lead Hazard Evaluation

A quantitative determination of employee exposure to lead. Includes full shift personal samples that are representative of the monitored employee's regular, daily exposure to lead.

OSHA Action Level (AL)

Under the US Department of Labor, Occupational Safety and Health Administration (OSHA) Lead in Construction Standard 29 CFR 1926.62 and Lead in General Industry Standard 29 CFR 1910.1025 is defined as an exposure of 30 ug/m³ as averaged over the course of an eight-hour workday.

OSHA Permissible Exposure Limit (PEL)

Under the US Department of Labor, Occupational Safety and Health Administration (OSHA) Lead in Construction Standard 29 CFR 1926.62 and Lead in General Industry Standard 29 CFR 1910.1025 is defined as a time-weighted average exposure of 50 ug/m³ as measured over the course of an eight-hour workday.

Public Building

"A building constructed prior to 1978 which is generally open to the public or occupied or visited by children."

Other Housing

Housing constructed prior to 1978 occupied by children under the age of six years. Any dwelling, such as a dormitory, in which the living area is not separated from the sleeping area is classified as a zero-bedroom dwelling and is not considered target housing.

3. ROLES and RESPONSIBILITIES

3.1

Tufts Environmental Health and Safety (TEHS) is responsible for identifying at-risk job tasks, conducting task-specific lead hazard evaluations, sampling, evaluation of renovation activities, inspections of dormitory apartments and other housing, notification and lead education for occupants residing in dormitory apartments, other housing and campus buildings undergoing renovation or maintenance where lead paint will be disturbed. TEHS is also responsible for abatement oversight, waste characterization / disposal, training and record keeping.

3.2

The Tufts University Office of Residential Life is responsible for disclosure, to occupants moving into dormitory apartments and other housing, of all lead-based paint data for the unit to be occupied. They will also provide occupants of dormitory

apartments and other housing with a copy of the US EPA pamphlet entitled "Protect Your Family from Lead in Your Home".

<http://www.epa.gov/lead/pubs/leadpdf.pdf>

3.3

The Tufts University Facilities Services Department is responsible for notifying TEHS of changes in job descriptions and/or work tasks that may result in rendering initial TEHS lead hazard assessments as being unrepresentative and notifying TEHS of any renovation or maintenance projects that may involve working with suspected lead-based paint surfaces.

3.4

Supervisors are responsible for requesting lead hazard evaluations for employees and notifying TEHS of unusual conditions or changes in work practices that would make initial lead hazard evaluations non-representative of actual lead exposure. Supervisors are also responsible for scheduling and ensuring employee attendance at annual TTEHS Hazard Communication training and enrolling employees exposed to lead above the OSHA action level into a medical surveillance program with Occupational Medicine.

3.5

Employees are responsible for participating in annual TEHS Hazard Communication training and participating in the medical surveillance program. Employees are also responsible for using personal protective equipment, engineering controls and adhering to administrative work practices as instructed and notifying supervisors of unusual conditions or changes in work practices that would make initial lead hazard assessments as being non-representative of actual lead exposures.

4. PROCEDURES

4.1

Written Standard Operating Procedures

The Lead Exposure Control Plan outlines lead management procedures and controls implemented by TEHS to prevent lead exposures to building occupants, visitors, maintenance personnel and renovation contractors within University-owned and operated facilities covered by this policy.

4.2

Determination of Employee Lead Exposure

TEHS or a designated third party vendor shall perform lead hazard assessments on all tasks having the potential to expose employees to levels of lead above the OSHA action level of 30 ug/m³ as an eight-hour time-weighted average. The assessments shall include air monitoring and observation of work practices and engineering controls typically used for each task. TEHS shall provide the employee and supervisor with a written copy of the sampling results and findings within five working days of the assessment. The report will describe any required changes in work practices or engineering controls based upon TEHS observation of the task and also notify the employee of the frequency of follow-up sampling if applicable.

4.3

Paint Sampling

A Massachusetts Authorized Inspector or qualified TEHS staff shall perform all sampling associated with lead paint activities. As a matter of prudent practice, TEHS will perform testing of painted surfaces, by request, for non-regulated demolition and renovation projects. TEHS will conduct testing of any painted surfaces to be disturbed within dormitory apartments or other housing. Testing of painted surfaces will be performed either in-house by portable X-Ray Fluorescence (XRF) and/or by lab analysis of bulk paint chip samples by an AIHA accredited laboratory. Following paint testing, TTEHS will provide a written response and recommend case-specific procedures to be followed. Generally, this will include notifying all contractors of sample results and requesting that written work practices be submitted to TEHS for review.

4.4

Project Oversight

TEHS requires that Massachusetts lead paint contractors and personnel are used for lead paint activities within target housing and public buildings. TEHS recommends the use of authorized contractors and personnel in unregulated renovation projects involving the disturbance of lead-based paint. TEHS will provide occupants of dormitory apartments and other housing with EPA pamphlet entitled "Protect Your Family from Lead in Your Home" prior to renovations or maintenance activities that disturb more than two square feet of lead-based paint. TEHS will perform air and clearance wipe sampling as required assuring the safety of building occupants.

4.5

Waste Disposal

TEHS shall perform waste stream characterization of suspected lead containing waste materials by laboratory analysis following EPA Toxicity Characteristic Leaching Procedure (TCLP) for lead (40 CFR 261.24). TEHS will coordinate waste disposal of lead-containing materials.

For large scale projects all inspection testing, waste characterization and disposal should be contracted to authorized specialists.

4.6

Training

TEHS, as part of its annual Hazard Communication training, shall discuss the Lead Exposure Control Plan and job tasks that are likely to result in exposure to lead above the OSHA action level of 30 ug/m³ as an eight hour time-weighted average and discuss the importance of worker input in identifying other tasks that may not have been identified by OSHA. Employees will be informed of lead-related services offered through TEHS and trained on the importance of proper hygiene during and after performing tasks that may involve exposure to lead.

4.7

Recordkeeping

TEHS maintains all documents relating to lead exposure including sampling data, waste disposal manifests, regulatory agency and other correspondence. The Office of

Residential Life maintains all lead paint disclosure forms and records the tenants name(s) and date discussed with the tenant. All records are kept indefinitely.

See Tufts Lead Exposure Control Plan

Resources

OSHA Lead in Construction Resources

http://www.osha.gov/pls/oshaweb/owasrch.search_form?p_doc_type=STANDARD&p_toc_level=0

USEPA Lead Rules and Regulation

<http://www.epa.gov/opptintr/lead/pubs/regulation.htm>

USEPA Lead in Paint Dust and Soil

<http://www.epa.gov/opptintr/lead/index.html>

EPA/HUD Model Renovator Training Course

<http://www.epa.gov/opptintr/lead/pubs/epahudrrmodel.htm>

USEPA Lead in Drinking Water

<http://www.epa.gov/OGWDW/lead/index.html>

Massachusetts Lead Poisoning and Control

105 CMR 460.000

<http://.mass.gov/Eeohhs2/docs/dph/environmental/lead/1054601.pdf>

Massachusetts Deleading Information

http://www.mass.gov/?pageID=eohhs2terminal&L=7&L0=Home&L1=Consumer&L2=Community+Health+and+Safety&L3=Environmental+Health&L4=Environmental+Exposure+Topics&L5=Lead&L6=Ordering+Materials+and+Additional+Resources&sid=Eeohhs2&b=terminalcontent&f=dph_environmental_lead_c_easy_to_read&csid=Eeohhs2