I. **Purpose and Applicability**

It is the policy of Villanova University in coordination with the Environmental Health and Safety Department to provide the University community with a safe and healthy 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.

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

II. **Definitions**

**Construction Work** - Work for construction, alteration, and/or repair, including painting and decorating. Construction work includes but is not limited to demolition or salvage of structures containing lead, removal or encapsulation of materials containing lead, new construction, alteration, repair or renovation of structures containing lead and maintenance operations associated with these construction activities.

**Lead-Based Paint Abatement** - A set of measures designed to eliminate or reduce lead-based paint hazards in accordance with standards established by EPA. The term *does not include renovation and remodeling activities* by contractors whose primary intent is not to permanently eliminate or reduce lead-based paint hazards, but is instead to repair, restore or remodel a given structure or dwelling.

**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.
<table>
<thead>
<tr>
<th>Subject: Lead Management Program</th>
<th>Number: S25</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Effective: 2010</td>
</tr>
<tr>
<td></td>
<td>Revised: 4/15</td>
</tr>
</tbody>
</table>

Lead Free Certification - A certification provided by an Accredited, Pennsylvania Lead Risk Assessor or EPA-accredited Lead Dust Sampling Technician to a lessee with children aged six and under that the property is free of lead-based paint.

Lead Safe Certification - A certification provided by an Accredited, Pennsylvania Lead Risk Assessor or EPA-accredited Lead Dust Sampling Technician to a lessee with children aged six and under that the property is free of lead-based paint hazards.

Lead Hazard Evaluation - A quantitative determination of employee exposure to lead. Includes full shift personal air samples that are representative of the monitored employee’s regular, daily exposure to lead.

Lead Hot Work - Burning, cutting or torch burning of materials that have lead-containing coatings or paint.

OSHA Action Level (AL) for Lead - a time-weighted average exposure of 30 ug/m³ as averaged over the course of an eight-hour workday.

OSHA Permissible Exposure Limit (PEL) for Lead - 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.

Target Housing - Housing constructed prior to 1978. 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.
III. Roles and Responsibilities

The Environmental Health and Safety Department is responsible for:
- Maintaining the University’s Lead Management Program.
- Performing air monitoring of at-risk employees as requested by supervisors, employees or the EHS Department.
- Coordinating lead-based paint surveys of target housing and facilities occupied by children.
- Lead-based paint abatement project management.
- Consultation to ensure occupant safety during construction projects involving demolition, surface preparation of painted surfaces or paint removal.
- Waste characterization and disposal.

Administration and Finance Dept. is responsible for:
- Disclosure to lessees of dormitory apartments or target housing with children aged six and under, of all lead-based paint data for the unit to be occupied.
- Providing lessees of target housing with children aged six and under, with either a certification of “Lead Safe” or “Lead Free” status. Providing lessees of target housing with children aged six and under, with an EPA pamphlet entitled “Protect Your Family from Lead in Your Home.
- Obtaining and maintaining all lessee lead disclosure forms.

Project Managers or Maintenance Supervisors overseeing construction or lead hot work are responsible for:
- Notifying EHS of any construction or maintenance projects within target housing or child-occupied facilities that may involve disturbance of painted surfaces.
- Notifying EHS of paint surface preparation and removal projects or other dust/fume generating construction or maintenance projects that could be reasonably anticipated to create dust/fumes that could impact occupied areas in any campus location.
Supervisors of employees performing construction or lead hot work are responsible for:
- Requesting lead hazard evaluations for employees.
- Notifying EHS of unusual conditions or changes in work practices that would make initial lead hazard evaluations non-representative of actual lead exposure.
- Scheduling and ensuring employee attendance at EHS safety training.
- Enrolling employees exposed to lead above the OSHA action level into a medical surveillance program with HUP Occupational Medicine.
- Enrolling employees exposed to lead above the OSHA action level into a respiratory protection program, including medical clearance and EHS respiratory protection program training and fit testing.

Employees who perform construction work are responsible for:
- Participating in EHS safety training.
- Participating in medical surveillance program.
- Following proper procedures to prevent disturbance of lead-containing materials while performing assigned tasks.
- Using engineering controls, personal protective equipment and following administrative controls designed to minimize lead exposure.
- Notifying supervisors of unusual conditions or changes in work practices that would make initial lead hazard assessments non-representative of actual lead exposures.
IV. Procedures

The Lead Management Program outlines procedures designed to protect the Villanova community from lead exposures within Villanova University’s facilities.

**Determination of Employee Lead Exposure**  - Upon request, EHS shall perform lead hazard assessments for construction or lead hot work tasks having the potential to expose employees to levels of lead above the OSHA action level of 30 μg/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. EHS 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 EHS observation of the task in order to reduce the exposure and also notify the employee of the frequency of follow-up sampling if applicable.

**Paint Sampling**  - Commonwealth of Pennsylvania-accredited Lead Inspector or Risk Assessor shall perform all sampling associated with lead paint activities. As a matter of prudent practice, EHS may perform testing of painted surfaces, by request, for non-regulated demolition and renovation projects. Paint sampling is typically not performed in order to define safe work practices. There is no safe threshold concentration of lead in paint, therefore work practices and personal protective equipment selection must be defined by task-specific air monitoring.

EHS will coordinate testing of any painted surfaces to be disturbed within dormitory apartments, target housing and child-occupied facilities. 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, EHS will provide a written report summarizing the results.

EHS will submit samples of suspected lead-containing waste materials to a laboratory for analysis following EPA Toxicity Characteristic Leaching Procedure (TCLP) in order to determine proper disposal requirements.
Project Oversight - EHS requires that EPA/Commonwealth of Pennsylvania-accredited lead paint contractors and personnel are used for lead paint activities within target housing and child-occupied facilities.

EHS requires that contractors accredited under EPA 40 CFR 745 (EPA Renovation, Repair, and Painting Rule) be used for construction or maintenance activities that disturb painted surfaces in target housing and child-occupied facilities.

EHS recommends the use of contractors and personnel that have EPA-accredited lead training (Lead-Safe Certified Firm) for unregulated construction projects involving large-scale surface preparation, disturbance or removal of paint.

EHS will provide occupants of dormitory apartments and target 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. EHS will coordinate inspections and air and clearance wipe sampling as required to assure the safety of building occupants.

Construction & Renovation Projects - Construction project managers shall implement the following procedures for projects involving demolition, paint surface preparation and removal or other dust generating construction or maintenance projects where dust or fumes could be reasonably anticipated to impact occupied areas.

- Insure contractors comply with Penn’s construction services agreement that requires compliance with all applicable regulatory standards, including those related to lead. This includes the OSHA lead standards 1926.62 (construction) & 1910.1025 (general industry) and the EPA Renovation, Repair, and Painting Rule-40 CFR 745 subpart L, pertaining to work in target housing and child-occupied facilities.

- Require the contractor to submit a written Lead Compliance Plan that defines the methods & procedures to be implemented in order to safely perform the project and control emissions.

- Submit the Lead Compliance Plan to EHS for review. The intent of the review is to ensure that the contractor will take adequate measures to protect the Villanova community. For example, if the contractor is protecting its workers through the use of personal protective equipment including respirators, EHS needs to ensure that adequate measures, including isolation of ventilation systems and the work area, will be taken to protect the surrounding Villanova community.
• Depending on the removal methodology, EHS may perform or coordinate air sampling and inspections in nearby occupied areas to assure the safety of the Villanova community in the proximity of the project. A visual inspection may be warranted at the completion of the project to confirm that the work area has been properly cleaned.

• On projects where paints/finishes are being removed from substrate materials, EHS must be contacted to have the paint analyzed in order to characterize it for proper disposal. If the paint is characterized as hazardous waste, EHS will provide or help with acquisition of disposal containers and coordinate disposal.

Waste Disposal - EHS shall perform waste stream characterization of suspected lead-containing waste materials by laboratory analysis following EPA Toxicity Characteristic Leaching Procedure (TCLP). EHS shall coordinate waste disposal of lead-containing materials.

Record Keeping - EHS maintains all documents relating to lead exposure including hazard assessments, sampling data, waste disposal manifests, all correspondence and all medical records.

Supervisors maintain lead hazard exposure assessments of the employees they supervise.

The Office of the Vice President and General Council maintain all lessee lead paint disclosure and certification forms.

All records are kept permanently.

V. References and Resources

• OSHA Lead in Construction Standard

• EPA Lead Programs
  http://www.epa.gov/opptintr/lead/index.html