

# Lead Management Program

## Purpose and Scope

The Lead Management Program has been developed to inform WCU employees of the appropriate procedures to follow in order to prevent building occupants, visitors, maintenance personnel and contractors from exposure to hazardous levels of lead.

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

## Responsibilities

### Environmental Health and Safety

- Provide program oversight and consultation to WCU work groups regarding potential risks and exposure prevention.
- Conduct or coordinate building assessments for lead containing materials and perform employee lead hazard assessments/monitoring.

### Facilities Departments/ Project Manager

- Assume all coated surfaces in older buildings built before 1978 are lead containing unless specifically tested and documented by EHS.
- Identify a qualified person, or contracted agent, as the responsible person for overseeing the management of lead-containing materials in their university-owned and managed buildings.
- Ensure lead surveys are conducted and sample results are understood before impacting building materials that may contain lead-containing paint or other lead-containing materials.
- Provide required PPE and ensure its proper use.

### Employees

- Stop work if potentially hazardous conditions are identified and report such conditions to their supervisor prior to resumption of work.
- Properly store and maintain personal protective equipment (PPE).
- Immediately report all safety incidents and any potential health effects to their supervisor.

### Construction, Renovation, and Demolition Projects

- The Project manager should ensure in consultation with EHS that contractors comply with WCU's construction services agreement that requires compliance with all applicable regulatory standards, including those related to lead.
- Depending on the removal methodology, EHS may perform or coordinate air sampling and inspections in nearby occupied areas to assure the safety of the WCU community in the proximity of the project.
- 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.

## Procedures

### Managing Lead at WCU

Ideally, use a safer alternative instead of a lead-containing material, or eliminate the need to use it. If not feasible, follow this written Lead Safety Program to manage lead-containing materials safely and use engineering controls, safe work practices and personal protective equipment (PPE), including respiratory protection as needed, to limit lead exposures to the lowest levels possible. Consult with EHS if you feel there is potential for lead exposure.

### Lead- Containing Building Materials

The most common lead-containing material in buildings is lead-containing paint in older buildings built before 1978. Other lead-containing building materials may include roofing and pipework, solder in plumbing and electrical equipment and systems, mortar in brick and stonework in older buildings, glazing, and leaded glass.

### Paint Sampling

EHS shall initiate all sampling associated with lead paint activities by request for 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.

Testing of painted surfaces will be performed by lab analysis of bulk paint chip samples by an AIHA-accredited laboratory. Following paint testing, EHS shall provide a written report summarizing the results.

### Project Oversight

- EPA/Commonwealth of Pennsylvania-accredited lead paint contractors and personnel must be used for lead paint activities within target housing and public buildings.
- EHS requires that contractors accredited under EPA 40 CFR 745 (EPA Renovation, Repair, and Painting Rule) are used for construction or maintenance activities that disturb painted surfaces.
- EHS recommends the use of contractors and personnel that have EPA-accredited lead training (Lead-Safe Certified Firm) for construction projects involving large-scale surface preparation, disturbance, or removal of paint.

### Waste Disposal

EHS shall perform waste stream characterization of suspected lead- containing waste materials and 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 and all correspondence.
- Supervisors maintain lead hazard exposure assessments of the employees they supervise.
- Occupational Medicine maintains all medical records.
- All records are kept indefinitely.

## References

[OSHA Lead in Construction Standard](#)

[EPA Lead Programs](#)

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