



LEAD PAINT MANAGEMENT PROGRAM

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1.0 PURPOSE

The USC Lead Paint Management Program is intended to provide an effective plan to manage and control exposure to lead-based paint throughout the University.

2.0 APPLICABILITY AND SCOPE

This program applies to all maintenance, construction, demolition and/or renovation activities by all University departments and to personnel who manage University day care centers, family housing, or other University owned residential rental properties.

3.0 APPLICABLE REGULATIONS AND STANDARDS

California: Title 8, California Code of Regulations, Section 1532 (8 CCR 1532)
 California Health and Safety Code 25249.5. “Proposition 65. Safety Drinking Water and
 Toxics Enforcement Act of 1986” (CHSC 25249.5)
 California Health and Safety Code 25915 (CHSC 25915)

Federal: Title 29, Code of Federal Regulations, 1926.62, Lead

- Title 29, Code of Federal Regulations, Section 1910.20, “Access to Medical and Industrial Hygiene Records” (29 CFR 1910.20)
- Title 29, Code of Federal Regulations, 1910.134 [General Industry, Use of Respirators] (29 CFR 1910.134)
- Title 40, Code of Federal Regulations, Part 61 Subpart M (Clean Air Act: National Emission Standards for Hazardous Air Pollutants [NESHAP]) (40 CFR 61.M)
- Title 40, Code of Federal Regulations, Section 763 Subpart I Section 6 (Toxic Substances Control Act [TSCA]) (40 CFR 763.6)
- Title 40, Code of Federal Regulations, 763 Subpart E Sections 80 - 99 (Toxic Substances Control Act [TSCA]) (40 CFR 763.80-99)
- Title 40, Code of Federal Regulations, 763 Subpart G Sections 120 - 126 (Toxic Substances Control Act [TSCA]) (40 CFR 763.120-126)

4.0 DEFINITIONS

Lead (Pb) - A heavy metal at room temperature and pressure and is a basic chemical element. Lead can combine with various other substances to form numerous inorganic and organic lead compounds.

5.0 RESPONSIBILITIES

All maintenance, construction, demolition and renovation activities on University property must be performed in accordance with all applicable lead regulations and with procedures contained in this document. Each department is responsible for assuring that the procedures contained in this program are followed by employees, students, visitors and contractors under their supervision.

The University shall make available at no cost appropriate training and, when required, medical evaluations, to employees whose responsibilities expose them to lead-based paint.

Environmental Health and Safety will oversee the administration of this Program, but ultimate responsibility for implementation rests with each department.

5.1 Career and Protective Services Responsibilities

Career and Protective Services is responsible for:

- Assisting departments with identification of lead-based paint in the work place;
- Assisting employees, students and supervisors with obtaining medical clearance;
- Providing training in lead awareness;
- Maintaining training documents and written medical clearance documents;
- Periodically inspecting work areas that contain lead-based paint; and
- Reviewing this written program annually and notifying constituents of changes.

5.2 Manager and Supervisor Responsibilities

Each manager and supervisor affected by this program is responsible for:

- Being familiar with this Lead Paint Management Program;

- Informing employees of known or suspected lead-based paint in work areas where they will be present;
- Assuring that proper lead warning signs are posted in work areas containing known or suspected lead-based paint;
- Minimizing exposures to lead-based paint by engineering out the lead exposure hazard (e.g., abatement, containment), and by limiting the time that employees are exposed to such hazards;
- Assuring that employees who may be exposed to lead-based paint attend lead awareness training prior to exposure and annually thereafter;
- Assuring that employees who are exposed to lead-based paint are offered annual medical surveillance prior to and after an exposure above the OSHA PEL;
- Periodically inspecting work areas that contain lead-based paint; and
- Informing contractors of known or suspected lead-based paint in assigned work area.

5.1 Employee Responsibilities

Each employee affected by this program is responsible for:

- Being familiar with this Lead Paint Management Program;
- Never performing a job or be present at any location where lead-based paint will be disturbed unless all provisions of this Lead Paint Management Program are observed;
- Attending lead awareness training prior to exposure and annually thereafter (schedule through Professional Development);
- Leaving the area in the event of respiratory equipment malfunction, physical or psychological distress, or other unsafe conditions that require relief;
- Notifying the supervisor of any significant change in medical condition; and
- Notifying the supervisor of any known or suspected lead-based paint in poor condition.

6.0 PROCEDURES

6.1 Lead Paint Maintenance

The following procedures for work around lead-based paint apply to maintenance and custodial personnel, and building occupants, inspectors, and their supervisors. Supervisors are responsible for the following:

1. Identify lead-based paint that their employees and contractors work around. Environmental Health and Safety is available to assist with identification.
2. Assure that all employees who work around lead-based paint receive Lead Awareness training that is appropriate for their assigned work tasks, and that meets applicable regulations.
3. Provide written Standard Operating Procedures for work tasks that involve lead-based paint, that:
 - A. assure that the materials will not be disturbed;
 - B. assure that any tools or chemicals used will not damage the lead-based paint;
 - C. assure that employees use appropriate tools, work procedures and personal protective equipment; and
 - D. include emergency procedures.
4. Provide employees with SOP training (see above).

5. If suspected lead-based paint is found to be in poor condition, follow the procedures below.
 - A. Note the location, condition, and date.
 - B. Avoid further disturbing the material. If material is severely damaged, post a hazard sign, cordon off the area, and call Environmental Health and Safety.
 - C. Check the Lead Sampling Database for information on the material by any of the following means:
 - i. access the Lead Database on the CAPS h:\ drive (contact EHS for database access and training);
 - ii. call EHS at 213-740-6213, -7278, or -6448; or Steve Hall (FMS Safety, x05166) or Landry Kacou (Housing Maintenance, x02043). These persons can e-mail or fax to you a list of known lead-based paint, or tell you by phone whether a material has been sampled and, if so, whether it contains lead.
 - D. If the material has been sampled and is known to NOT contain lead, repair or patch it as appropriate or report it to Facilities Maintenance (213-740-6833) to schedule repair.
 - E. If the material has not been sampled, inform Industrial Hygiene staff (213-740-6448), who will sample the material in question.
 - F. If the material is known to contain lead, inform the Industrial Hygiene staff (213-740-6448), who will inspect the site and initiate controls or abatement through FMS as appropriate.

6.2 **Lead Paint Abatement**

6.2.1 **Parties Involved with Lead Paint Abatement:**

All lead abatement projects, regardless of size and scope will require participation by the following groups:

- Environmental Health and Safety;
- the Project Manager;
- an Environmental Consultant selected from the “USC Approved Consultants and Contractors Listing;” and
- a Lead Paint Abatement Contractor selected from the “USC Approved Consultants and Contractors Listing.”

Environmental Health and Safety shall provide the following services when lead is assumed or is positively identified in paint impacted by a proposed construction project:

1. Make available for pre-construction reference results of any lead paint sampling;
2. Assist the Project Manager in selecting an Environmental Consultant to collect and analyze representative samples for positive identification of suspected lead-based paint not reported in existing building surveys;
3. Assist the Project Manager with consultation regarding the most feasible options for dealing with lead paint;
4. Assist the Project Manager in selecting an Abatement Contractor and an Environmental Consultant if removal of lead-based paint is feasible;
5. Assist the Project Manager with pre-construction meetings to inform occupants of abatement;
6. Coordinate with the Abatement Contractor and USC Environmental Specialists to inspect lead-based paint waste prior to shipment and sign the waste manifest for waste destined for appropriate

disposal;

7. Retain copies of documents and final reports associated with USC abatement projects.

The Project Manager from Facilities Management Services, Auxiliary Services, Housing and Residence Halls, Property Management or any other campus department shall:

1. Inform Environmental Health and Safety of the intent to perform lead abatement activity.
 - a. Fax, mail or e-mail a completed Hazardous Materials Abatement Notification Form to Environmental Health and Safety, to be received at least five working days prior to abatement activity on campus, and
 - b. Inform Environmental Health and Safety at 213-740-6448 of the pre-abatement meeting and job walk so that a representative can attend.
2. Contract and compensate both a state-licensed and certified Abatement Contractor and Environmental Consultant.
 - a. The Abatement Contractor and Environmental Consultant shall be pre-approved by an Abatement Contractor Approval Committee, consisting of representatives from Purchasing, Facilities Management Services, Housing, and Environmental Health and Safety.
 - i. Refer to the current USC Approved Consultants and Contractors Listing for information.
 - b. Provide the Abatement Contractor with the current list of USC-approved landfill sites.
 - i. Refer to the USC List of Acceptable Transfer, Storage and Disposal Facilities generated by Environmental Health and Safety.
 - c. Inform the Abatement Contractor that:
 - i. Only Environmental Health and Safety personnel may sign any hazardous waste manifest, and
 - ii. Environmental Health and Safety personnel must inspect the waste prior to transport.
3. Coordinate the lead-based paint removal project so as to minimize potential disturbance (i.e., noise, access, odors, dust) to building occupants.
4. Provide Lead Abatement Notification to building occupants.
 - a. Post the Notice of Hazardous Materials Removal Project on building entrances;
 - b. Arrange and conduct pre-abatement informational meetings to inform occupants of upcoming abatement;
 - c. Inform the appropriate janitorial service coordinator of the location and time of the abatement before it occurs, so that janitors can be reassigned away from the location for the duration of the abatement.
5. Provide a “sign-off” signature verifying that the lead removal was completed in accordance with the original project design specifications.
6. Obtain a project Close-Out Report from the Environmental Consultant, and assure that a copy is forwarded to Environmental Health and Safety (mail code 1143).
 - a. Assure that the Close-Out Report includes the exact location and a concise description of the lead-based paint that were removed.

The **Environmental Consultant** shall:

1. Act as the University’s representative, therefore supervising and controlling the abatement project so that it is performed in accordance with all applicable federal, state and local lead regulations.
2. Develop a detailed abatement work specification for complex projects that require timely

- coordination of construction activities.
3. Perform air monitoring via the collection of air samples in order to verify the control of lead-containing dust in the removal process.
 4. Document all work performed by the abatement contractor and pertinent information relating to the project.
 5. Halt the abatement work and implementing corrective measures when serious problems arise.
 6. Generate a final Project Close-Out Report which is to include:
 - a. Copies of all required permits (LAFD, AQMD, etc.);
 - b. Copies of lead waste manifests, air monitoring results, bulk sample results if applicable, abatement worker certifications, medical clearances and fit testing records, and project management documentation, including daily field notes; and
 - c. A concise description of the lead-based paint that were removed and the exact location from which they were removed.

The **Abatement Contractor** shall:

1. Notify, file, and obtain all required permits (i.e., AQMD, LAFD) for abatement activity to proceed, and modify those permits with the appropriate agency if the intended project's date and time has been changed.
2. Perform the abatement of lead-based paint in a timely and well-controlled manner under the direction of the Environmental Consultant.
3. Supply adequate amounts of manpower and equipment necessary to perform the job safely.
4. Provide personal air monitoring for the contractor's employees;
5. Obtain an appropriate, secured waste dumpster in which to store the lead waste until transport;
6. Contract a licensed, certified hazardous waste hauler to transport the lead waste to a landfill suitable for hazardous wastes and pre-approved by USC Environmental Health and Safety.
 - a. Refer to the List of Acceptable Transfer, Storage and Disposal Facilities generated by Environmental Health and Safety; and
 - b. Contact Environmental Health and Safety (EHS) at 213-740-6448 at least 24-hours before each scheduled hazardous waste shipment to arrange for a representative from EHS to sign the waste manifest.

6.3 Pre-Abatement Procedure

1. Prior to construction, demolition, or other renovation activities involved with a project, the Project Manager shall review current hazardous materials surveys and additional sampling information from Environmental Health and Safety for the presence of lead in the intended work area. If the project will disturb other building materials in a pre-1978 structure, contract with an approved Environmental Consultant for an hazardous materials survey
 - a. Forward a copy of any new hazardous materials surveys to Environmental Health and Safety.
2. If lead-based paint is involved with the proposed project, the Project Manager shall consult with Environmental Health and Safety for management alternatives to lead removal.
3. If lead abatement is required, the Project Manager shall notify Environmental Health and Safety of intended abatement activity via the Abatement Notification Form. The selection of Environmental Consultants and of Abatement Contractors shall agree with Environmental Health and Safety's Approved Listing of Consultants and Contractors.
4. The Project Manager shall include Environmental Health and Safety in pre-project meetings

involving lead issues.

5. Copies of the Environmental Consultant’s final report document shall be forwarded to Environmental Health and Safety for retention.
6. All pertinent paperwork shall be forwarded to:

USC Environmental Health and Safety

Lead Paint Management Program

Stonier Hall (STO 101)

837 Downey Way

Los Angeles, CA 90089-1143

Phone: (213) 740-6448

Fax: (213) 740-0820

7.0 PROGRAM APPROVAL AND REVIEW

Date revised: January 10, 2006	By: Jane Bartlett , Alfred M. Bouziane
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