

University of Delaware
Environmental Health and Safety Protocol

Section: Environmental

Protocol Name: Lead Paint Management

Origination Date: 2/19/2019

Revisions:

Protocol Number: E-02

I. SCOPE OF PROTOCOL

This protocol addresses Lead-Based Paint Management and applies to all university departments, faculty, staff, students, and contract personnel.

II. DEFINITIONS

A. Lead Based Paint (LBP)

1. Any paint or coating that contains at least 1.0 mg/cm² of lead or more than 0.5% lead by weight.

B. LBP hazard

1. A section of LBP in a University-owned building that is peeling, chipping, deteriorating, or has been abraded
2. Surface dust in University-owned Target Housing or Child-Occupied Facility which exceeds EPA's level for lead content
3. Bare soil in University-owned target housing or child-occupied facility which exceeds EPA's level for lead content.

C. Lead abatement

1. Any set of measures which is designed to permanently eliminate LBP hazards.

D. Lead paint stabilization

1. The removal of loose paint and other material from the surface to be treated and application of a new protective coating or paint.

E. Target Housing

1. Any housing constructed prior to 1978, except:
 - a. Housing for the elderly or persons with disabilities (unless any child who is less than 6 years of age resides in or is expected to reside in such housing) or
 - b. Any zero-bedroom dwelling, including efficiency apartments, single-room occupancy housing, dormitories, or military barracks.

F. Child-Occupied Facility

1. A building, or portion of a building, constructed prior to 1978, visited regularly by the same child, under 6 years of age, on at least two different days within any week (Sunday through Saturday period), provided that each day's visit lasts at least 3 hours and the combined weekly visits last at least 6 hours, and the combined annual visits last at least 60 hours

III. PROTOCOL STATEMENT

- A. To ensure the lead exposure of all university personnel, students, guests, visitors, tenants and contract personnel are minimized, and to prevent childhood lead poisoning:
1. Activities that could potentially disturb lead based paint in University-owned buildings shall be performed in accordance with applicable state and federal regulations and standard safety practices.
 2. LBP hazards found in University-owned buildings shall be corrected by an established lead paint hazard reduction method.
 3. DEHS shall have authority to implement corrective actions and mandate appropriate work practices during activities that disturb LBP

IV. PROTOCOL STANDARDS AND PROCEDURES

- A. The DEHS shall write and maintain a LBP Management Plan and the DEHS shall be responsible for the management and implementation of the LBP Management Plan.
- B. The DEHS will provide oversight for lead inspections, lead risk assessments, lead abatements, lead paint stabilizations, and any other LBP hazard reduction method on all buildings owned by the University.
- C. For University-owned buildings, the DEHS shall be notified of the scope of work prior to the start of major projects which include repair, re-painting, or demolition of painted components. If the lead content of the paint is not already known then the painted surfaces must either be assumed to contain lead or the affected components must be sampled for lead.
- D. The following practices are prohibited in residential and commercial buildings while working with or around LBP at the University:
1. Torching or open flame burning
 2. Dry sanding or scraping
 3. Grinding, sanding, planing, and/or needle gunning with power tools or equipment not equipped with a shroud and HEPA vacuum attachment.
- E. DEHS shall require that specific University employees receive lead paint awareness training and annual refresher training thereafter. They shall also be responsible for determining which job classifications are subject to training.
- F. Environmental consultants that may be contracted by the University to perform lead paint inspections, lead risk assessments, monitor lead paint abatement projects, and prepare specifications shall be pre-approved by the DEHS and have appropriate training and licensing.
- G. LBP abatement firms that may be contracted by the University to perform LBP abatement work shall be pre-approved by DEHS and have appropriate training and licensing.
- H. Renovation and Painting firms that work in Target Housing and Child-Occupied Facilities shall comply with the State of Delaware's Residential Property Renovation, Repair and Painting regulation 16 DE Admin Code 4459B and have appropriate training and licensing.
- I. Waste generated from LBP projects must be disposed of properly in accordance with applicable state and federal regulations. TCLP sampling shall be employed where necessary to determine correct disposal of lead waste.

For more information regarding this policy, contact the Department of Environmental Health and Safety 302-831-8475.