

Wm. Jennings Bryan Dorn
Department of Veterans Affairs Medical Center
Columbia, South Carolina

Engineering Service
Standard Operating Procedure 137M 37

April 15, 2013

LEAD MANAGEMENT AND ABATEMENT

1. PURPOSE:

To establish standards, procedures, and guidelines for the management and abatement of lead-containing construction materials, paints and other materials this may present a hazard to the public.

2. POLICY:

It is the policy of this facility to minimize or eliminate exposure to lead hazards by patients, employees, or visitors through utilization of proper management, maintenance, and/or abatement techniques.

3. RESPONSIBILITIES:

a. Director, Facility Management Service (FMS) or designee:

(1) Make all employees aware of the contents of this SOP and MCM 544-812-13.

(2) Require all employees under their supervision to adhere to all lead management policies and procedures.

(3) Will enforce all VA, OSHA, and EPA regulations regarding identification, management, and abatement of lead containing materials.

(4) Will utilize qualified contractors for all demolition, abatement, and renovation projects, which are known or suspected to contain lead materials.

(5) Will assure proper management of known lead containing areas until abatement is achieved utilizing properly trained VA staff performing small scale short duration maintenance work.

(6) May act as the "competent person" as defined by OSHA and EPA.

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b. Safety Office:

- (1) May act as the “competent person” as defined by OSHA and EPA.
- (2) May conduct hazard assessments and inspect work practice controls.
- (3) May assist in training of employees.
- (4) Will maintain records from personal/environmental sampling and lead assessments.
- (5) Will provide oversight for any emergency repairs performed by VA employees, including proper PPE.

] *NOTE:* - A competent person is one who is capable of identifying existing and predictable lead hazards and has the authority to take necessary corrective actions. Where required by federal, state or local environment regulations, VA shall use persons certified or otherwise considered professionally qualified by regulatory agencies such as OSHA and EPA.

c. FMS Supervisors/Employees:

- (1) Supervisors will act as the “competent person” as defined by OSHA and EPA.
- (2) Will report any suspected lead-containing areas or materials not previously identified to the Director, Infrastructure.
- (3) Will review any work practice and PPE requirements defined in 3.b.1 above prior to any work activity proceeding.
- (4) Reporting Requirements: - Reports relating to local, state, and federal environmental regulations shall be generated by the Safety Office.
- (5) Responsible Office: - FMS

4. PROCEDURES:

a. Hazard Identification and Assessment:

- (1) The Safety Office shall conduct a lead assessment for the any work to be completed that may disturb lead based paint. All painted surfaces of building built prior to 1978 are considered suspect for lead based paint. A review of the Lead based paint assessment performed in 1997 by Koch environmental Management Inc. will be referenced when

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conducting the assessment. The safety office will report the results of these assessments to the Chief, FMS. This report shall identify the location and condition of lead containing materials.

(2) The Safety Office shall review work practices and controls for any work involving lead containing materials including the need for respiratory protection. This should be done by performing an initial determination of the conditions to be expected at the work site.

(3) A negative assessment supports the notion that during a particular operation, no employee would be expected to be exposed to lead levels above the OSHA "Action Level" of 30 micrograms per cubic meter of air in an eight-hour period. A negative assessment must be supported with documentation such as recent (within 12 months) area and/or personal sampling results or similar industry results.

b. Work Practices and Lead Hazard Control:

(1) Small scale maintenance work or emergency repairs can be authorized by the Director, Infrastructure. Small scale maintenance work (typically the larger of 2sqft or 10% of the total surface) or emergency repairs shall be reviewed by the Safety Office and, when feasible, can be performed by VA employees. Maintenance work or emergency repairs (i.e. repairs of ruptured pipes, installing fixtures, window or door work, painting, short duration soldering, and similar activities) that produce only small quantities of lead containing material/debris will be completed wearing appropriate PPE unless objective data can show that anticipated exposures would not be above the OSHA Permissible Exposure Limit (PEL) . The following work practices will be utilized:

(2) Moisten surface of area to be worked on with amended water (if no shock or slip hazard exists);

(3) Remove lead-based paint using wet methods only.

(4) Cut with shears instead of sawing/torch burning.

(5) Heat gun stripping with temperatures controlled below 700 degrees F;

(6) Collect all debris on 10-mil polyethylene sheeting or equivalent;

(7) Complete clean-up utilizing HEPA filtered vacuum or trisodium phosphate (TSP) detergent;

(8) Cleanup tools at end of task (do not use cleaning methods that would produce

airborne dust particles);

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(9) Wash hands before eating;

(10) Materials contaminated with lead dust may need to be disposed of as hazardous waste (consult with the Safety Office for directions).

NOTE: - Abatement does not include renovation, remodeling, landscaping or other activities, when such activities are not designed to permanently eliminate lead-based paint hazards, but, instead, are designed to repair, restore, or remodel a given structure or dwelling, even though these activities may incidentally result in a reduction or elimination of lead-based paint hazards. Furthermore, abatement does not include interim controls, operations and maintenance activities, or other measures and activities designed to temporarily, but not permanently, reduce lead-based paint hazards. Excerpt from Definition of Abatement 40CFR745 Subpart L

c. The above listed work practices should be reviewed prior to the work assignment and appropriate PPE determined, i.e., coveralls, shoe covers, eye protection, etc.

d. Work not considered small scale or of short duration by the Chief, FMS, and the Safety Manager or designee shall be performed by qualified contractor.

e. Work which has been defined as having a negative assessment precludes the need for respiratory protection, however, other PPE may be required such as gloves, goggles, etc.

f. Training: - Lead awareness and lead based paint maintenance training shall be provided annually for all employees who may be performing any of the small-scale tasks defined in IV.b.1 above and tasks that meet the definition of a negative initial assessment as performed by the competent person. The Safety Office is available to perform this training.

g. Medical Surveillance:

(1) Medical surveillance will be provided to any employee exposed to lead at or greater than the Action Level (AL) of 30 micrograms of lead per cubic meter of air calculated as an 8-hour-time-weighted average.

(2) Blood Lead Levels (BLL) less than 40 micrograms/dl require no immediate action but repeat testing in one year should be performed.

(3) BLL at or above 40 mcg/dl dictate the employee be removed from the contaminating environment and the tests will be repeated every two months until two consecutive analysis

show levels below 40 mcg/dl.

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(4) Where employees are or may be exposed to lead at or above the AL for more than 30 days in any consecutive 12 months (regardless of BLL) or if the BLL is found to be at or greater than 40 mcg/dl, medical exams and consultations will be provided for in accordance with OSHA 29 CFR 1910.1025.

(5) The employee health nurse will notify the employee of their right to file a CA1 or a CA2 and refer them to the human resource official in charge of OWCP claims for the proper filing of their on the job injury claim.

5. REFERENCES:

- a. OSHA 29 CFR 1910.1025, Lead
- b. OSHA 29 CFR 1910.62, Lead Construction Standard
- c. HUD, September 1992, Lead-Based Paint Risk Assessment Protocol
- d. OSHA 29 CFR 1910.134, Respiratory Protection
- e. Medical Center Memorandum 544-812-13, Lead Hazard Control Program

6. RECISSION: Standard Operating Procedure 138M-37 dated April 19, 2011

7. FOLLOW-UP RESPONSIBILITY: Maintenance Control Manager. This SOP is due for review annually and reissue as needed.

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Stan Domann, CHFM
Chief, Engineering Service

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WM. J. B. DORN VAMC
LEAD WORK PERMIT REQUEST

Supervisor: Type or print neatly. Complete all information in Section 1 at least 5 days in advance and send the completed form to the Safety Manager (137S). Incomplete permit requests will NOT be processed. Work may not begin until the Safety Manager or his/her designee has approved the permit.

SECTION I

Building: _____ Room/Area: _____

Beginning Date: _____ Ending Date: _____

Explain type of work or activity:

QUESTION

	Y	N	N/A
Is this considered maintenance or repair work?			
If yes, Contractor / Facility Staff will perform (circle one)			
Contractor Name:			
Foreman or POC:			
Phone:			
Station Project Number:			

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WM. J. B. DORN VAMC
LEAD WORK INSPECTION CHECKLIST

Supervisor: Type or print neatly. All work areas issued a lead work permit must be inspected DAILY. Completed form must be sent to the Safety Manager (137S). The Supervisor and the Safety Manager must inspect work continuing for two or more consecutive days. Mark "N/A" for all questions not related to the work.

SECTION I

Building: _____ Room/Area: _____

Beginning Date: _____ Inspection #: _____

Supervisor: _____

Workers: _____

	Y	N	N/A
Work/abatement area secure / Critical barriers visually intact			
Window installed as necessary			
Critical barriers pass smoke test			
Air machine(s) operating without interruption			
Barrier signs posted at all approaches and contain correct wording			
Building HVAC system/units secure or intakes protected			
Air monitoring scheduled – personal/environmental (Union notified)			
"Clean" room visually clean			
Shower water supply operational, comfortable and visually clean			
No loose debris on floor, above ceiling, on lights, pipes or conduits			
Bags sealed and labeled			
Fire exit and fire extinguisher provided			
Dust control measures in place and used			
PPE provided			
Emission compliance in place			

Work permit displayed			
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Describe any identified deficiencies. Work may not begin/continue until all items are corrected:

Supervisor Signature/Date: _____

Safety Manager or designee: _____