



UNIVERSITY OF MICHIGAN – DEARBORN
LEAD MANAGEMENT GUIDELINES

Prepared By

***The Department of Environmental Health and Safety & Emergency Management
in conjunction with Public Safety***

1300 Campus Support Services Bldg.

4901 Evergreen Rd.

Dearborn, MI 48128-2406

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UNIVERSITY OF MICHIGAN – DEARBORN

LEAD MANAGEMENT GUIDELINES

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FOR IN-HOUSE PERSONNEL

Section 1

Section 1.1 - Summary

- A. The intent of the Lead Management Guidelines for In-House Personnel is to provide instructions and procedures for the disturbance of lead-based painted components on the University of Michigan – Dearborn, (UM – Dearborn) campus by general and support staff employed by UM – Dearborn.
- B. UM – Dearborn is committed to ensuring that all persons and property located on our campus are free of exposure to lead in any form.
- C. This Guideline shall be followed by all UM – Dearborn employees when disturbing lead-based painted components.

Section 1.2 – Related Sections

- A. This Section shall be implemented in conjunction with Section 2, Lead Management Guidelines for Outside Contractors.

Section 1.3 – Definitions

- A. *Abatement* – means that lead-based paint is completely removed from a substrate in a child occupied facility or target housing.
- B. *Child Occupied Facility* – means a building or portion of a building constructed prior to 1978 that is visited regularly by a child who is 6 years of age or less. This would include, but is not limited to, a day-care center, preschool, and kindergarten classroom.
- C. *Disturbance* – means drilling, coring, sawing, chiseling or scraping into a lead-based painted component for the purpose of renovation or remodeling.
- D. *In-House Staff* – means any and all employees of UM – Dearborn.
- E. *Lead-Based Paint* – means any painted or other surface coating such as varnish, sealer, or stain containing lead in any detectable amount.
- F. *Negative Initial Determination* – means a written determination has been made by an employer that they're work activities on lead-based painted components will not cause

airborne concentrations of lead above the OSHA Action Level or Permissible Exposure Limit (PEL). This determination will allow employees to continue the same type of work on applicable surfaces without the need for personal protective equipment and other OSHA required procedures.

- G. *Restricted Lead Work Activities* – means work on lead-based painted components that will potentially result in elevated levels of airborne lead concentrations, such as abrasive blasting, welding, and torch burning.

Section 1.4 – In-House Training

- A. All in-house operation and maintenance staff shall be provided a lead awareness training course initially and periodically thereafter.

Section 1.5 – Lead Identification/Notification

- A. If in-house staff are assigned to work that will create a disturbance to a painted component, that staff member shall consult with his/her Supervisor or Manager to determine if the component is lead-based painted.
- B. If the Supervisor or Manager cannot provide information on the potential content of lead within the painted component, they shall consult with a UM – Dearborn Environmental Health and Safety & Emergency Management (EHSEM) Representative.
- C. The in-house staff shall not begin work that disturbs any painted component without obtaining verbal or written notification that the component is not lead, assuming that it does contain lead or obtaining notification that the component is indeed lead. If the in-house staff assumes that the component to be disturbed is lead, they shall treat the component as lead-based painted.

Section 1.6 – Procedures for Lead Component Disturbance

- A. All in-house staff that conduct disturbance to lead-based painted components shall adhere to the following procedures:
 - 1. Restrict access into the immediate area of lead disturbance;
 - 2. Use a disposable plastic drop cloth below the component being disturbed;
 - 3. If feasible, turn off or temporarily reroute the HVAC system within the immediate location of planned lead disturbance;
 - 4. Use methods that will reduce airborne concentrations of lead during disturbance, including, but not limited to the use of moist-removal methods and shrouds for mechanical tools;

5. Upon completion of disturbance activities, clean all affected surfaces, including the disposable plastic drop cloth, so that dust and debris are not tracked into other areas. This includes the use of disposable towels and a HEPA filtered vacuum;
6. Carefully roll up the disposable plastic drop cloth, seal in a leak-tight container and disposed of in a dumpster;
7. Turn on HVAC system.
8. If there are questions on these procedures, the in-house staff member shall consult with their Supervisor, Manager, or a UM – Dearborn EHSEM Representative.

Section 1.7 – Restricted Work Activities

- A. No in-house staff shall conduct abrasive blasting, including sandblasting, welding, or torch burning on any lead-based painted component without prior written approval from a UM – Dearborn EHSEM Representative.
- B. If, at any time, in-house staff believes that their work is generating excessive lead-based airborne dust or debris, they shall cease work immediately and consult with their Supervisor or Manager and a UM – Dearborn EHSEM Representative prior to continuing their work.
- C. If any in-house staff suspect or know that they are working on lead materials other than lead-based painted components, they shall cease work immediately and consult with their Supervisor, Manager, or a UM – Dearborn EHSEM Representative prior to continuing their work.
- D. No in-house staff shall conduct disturbance to painted surfaces within an on-campus child occupied facility without prior written approval from a UM- Dearborn – EHSEM Representative.

Section 1.8 – Lead-Based Paint Disposal

- A. If the debris generated from lead-based painted component disturbance includes any portion of the substrate component, the debris shall be disposed of in a dumpster.
- B. If the debris generated from lead-based painted component disturbance only includes the paint with no substrate component, such as paint chips, the in-house staff member shall place and seal the lead chips or debris into a leak-tight container and deliver to a UM – Dearborn EHSEM Representative at the Campus Support Services building.

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FOR OUTSIDE CONTRACTORS

Section 2

Section 2.1 - Summary

- A. The intent of the Lead Management Guidelines for Outside Contractors is to provide general procedures for the disturbance of lead-based painted components on the University of Michigan – Dearborn, (UM – Dearborn) campus by all outside contractors and subcontractor employees.
- C. The outside contractor or subcontractor shall adhere to this Lead Management Guidelines and all applicable Federal and Michigan State lead regulations, at their expense.
- D. UM – Dearborn is committed to ensuring that all persons and property located on our campus are free of exposure to lead in any form.
- E. This Guideline shall be followed by all outside contractor or subcontractor employees when disturbing lead-based painted components on the UM –Dearborn campus.

Section 2.2 – Related Sections

- A. This Section shall be implemented in conjunction with Section 1, Lead Management Guidelines for In-House Personnel.

Section 2.3 - Definitions

- A. *Abatement* – means that lead-based paint is completely removed from a substrate in a child occupied facility or target housing.
- B. *Child Occupied Facility* – means a building or portion of a building constructed prior to 1978 that is visited regularly by a child who is 6 years of age or less. This would include, but is not limited to, a day-care center, preschool, and kindergarten classroom.
- C. *Critical Barriers* – means a separation between the work area and the building occupants, such as plastic covering a door.
- D. *Disturbance* – means drilling, coring, sawing, chiseling or scraping into a lead-based painted component for the purpose of renovation or remodeling. Disturbance also includes the removal/selective demolition of lead-based painted components.
- E. *Lead-Based Paint* – means any painted or other surface coating such as varnish, sealer, or stain containing lead in any detectable amount.

- F. *Negative Initial Determination* – means a written determination has been made by an employer that they're work activities on lead-based painted components will not cause airborne concentrations of lead above the OSHA Action Level or Permissible Exposure Limit (PEL). This determination will allow employees to continue the same type of work on applicable surfaces without the need for personal protective equipment and other OSHA required procedures.
- G. *Outside Contractor* – All contractor or subcontractor employees who conduct work on UM – Dearborn's campus.
- H. *Restricted Lead Work Activities* – means work on lead-based painted components that will potentially result in elevated levels of airborne lead concentrations, such as abrasive blasting, welding, and torch burning.

Section 2.4 – Outside Contractor Training

- A. It is the responsibility of the outside contractors to provide lead awareness training to all employees who will be working on and potentially disturbing lead-based paint on UM – Dearborn's campus. Proof of training shall be submitted to University representatives upon request.

Section 2.5 – Lead Identification/Notification

- A. Many of the buildings on UM – Dearborn's campus have had partial lead inspections conducted. If not provided during the bidding process, outside contractors shall contact the UM – Dearborn Environmental Health and Safety & Emergency Management Director prior to the initiation of work.
- B. If the outside contractor is unable to determine the lead content of an individual component planned for disturbance, they shall assume that the painted component is lead.
- C. The outside contractor may use their own methods of determining the presence of lead in a given component as long as the collection and testing methods adhere to applicable regulatory standards.
- D. The Lead Management Guidelines, along with additional reference materials, is located at the following website. <http://www.umd.umich.edu/ehsem>. This information is available to all outside contractors for review.

Section 2.6 - Procedures for Lead Component Disturbance

- A. Ensure that adequate measures are in place to protect building occupants from exposure to airborne lead dust, particles, fumes or other lead content in the air. These measures, as identified within the [OSHA Lead Construction Standard](#) and [Part 603 of MIOSHA](#) include, but are not limited to the following:
1. Seal off openings into work area with critical barriers;
 2. Shut off or temporarily modify the HVAC system within the work area;
 3. Use a disposable plastic drop cloth below the component being disturbed;
 4. Conduct exposure monitoring, as necessary to ensure compliance with the OSHA Lead Construction Standard and Part 603 of MIOSHA;
 5. Develop written Negative Initial Determinations (NID), as necessary to ensure compliance with the OSHA Lead Construction Standard and Part 603 of MIOSHA;
 6. Use work practices that will ensure the control of airborne lead concentrations, including, but not limited to, moist-removal methods and shrouds for mechanical tools;
 7. Upon completion of disturbance activities, clean all affected surfaces, including the disposable plastic drop cloth, so that dust and debris are not tracked into other areas. This includes the use of disposable towels and a HEPA filtered vacuum;
 8. Carefully roll up the disposable plastic drop cloth, seal in a leak-tight container and disposed of in a dumpster;
 9. Turn on HVAC system.
 10. If exposure monitoring is conducted and airborne concentrations of lead exceed the OSHA Action Level or Permissible Exposure Limit, additional procedures shall be required pursuant to the OSHA Lead Construction Standard and Part 603 of MIOSHA.

Section 2.7 – Restricted Work Activities

- A. No outside contractors shall conduct abrasive blasting, including sandblasting, welding, or torch burning on any lead-based painted component without prior written approval from the UM – Dearborn EHSEM Director.
- B. If, at any time, the outside contractor believes that their work is generating excessive lead-based airborne dust or debris, they shall cease work immediately and consult with the UM – Dearborn EHSEM Director prior to continuing their work.
- C. If any outside contractor suspects or knows that they are working on lead materials other than lead-based painted components on UM – Dearborn’s campus, they shall

cease work immediately and consult with a UM – Dearborn EHSEM Representative prior to continuing their work.

- D. No outside contractor shall conduct disturbance to painted surfaces within an on-campus child occupied facility without prior written approval from a UM-Dearborn EHSEM Representative.

Section 2.8 – Lead-Based Paint Disposal

- A. If the debris generated from lead-based painted component disturbance includes any portion of the substrate component, the debris shall be sealed in a leak-tight container and disposed of in a dumpster.
- B. If the debris generated from lead-based painted component disturbance only includes the paint with no substrate component included, the outside contractor shall place and seal the lead chips or debris into a leak-tight container and deliver to the UM – Dearborn EHSEM Representative at the Campus Support Services building. EHSEM can provide leak-tight containers providing 10 day notice is provided. EHSEM can be contacted at (313)593-0921 or (313)593-4914

Section 2.9 – Recordkeeping Submittals

- A. The UM – Dearborn reserves the right to require that all outside contractors who disturb lead-based painted components on campus provide the following documents upon request:
 - 1. Proof of lead awareness training of affected employees;
 - 2. Outside contractor’s written Respiratory Protection Program;
 - 3. Respirator fit test in accordance with 1920.134 of OSHA for each affected employee;
 - 4. Medical surveillance information for each employee including physician’s written opinion on respirator use;
 - 5. Written Compliance Plan that details how the outside contractor will adhere to the applicable lead regulations, for this particular project.

Section 3.0 – Stop Work Orders

- A. A U of M – Dearborn EHSEM Representative or a University assigned representative shall have the authority to immediately stop work by any and all outside contractors at any time if they feel that the outside contractor’s lead work activities or disturbances pose a concern to human health or the environment.