LEAD-BASED PAINT BUILDING OCCUPANT & WORKER EXPOSURE PREVENTION AND CONTROL PLAN & PROCEDURE

Purpose

To prevent incidental impact of existing painted surfaces in/on BPS buildings which may contain lead-based paint.

Scope

Pertaining to all BPS buildings, furnishings machinery equipment where persons might be exposed to dust vapors containing lead (a central nervous system health hazard).

Specific federal rules (40 CFR Part 745) regulate lead-based paint operations in pre-kindergarten age child occupied facilities constructed prior to 1978. Since BPS does not operate pre-kindergarten education programs in buildings constructed prior to 1978, 40 CFR Part 745 does not apply. This procedure specifically pertains to all BPS building, regardless of building construction date and whether it has pre-kindergarten age occupants (or not). The intention behind this 'all-encompassing approach' is to insure no one is exposed to lead paint operations at any BPS facilities and to simplify the process for those unfamiliar with nuances associated with complex environmental regulatory requirements.

Applicability

This procedure applies to any person or group of persons who might be inclined to impact painted building or equipment surfaces on BPS property. This includes but is not limited to; maintenance workers, contractors, sub-contractors, utility workers, equipment vendors, custodians, teachers, and volunteers.

Procedures: Office of Env Health & Safety (EH&S)

Update and republish procedure when necessary to refine/improve the subject procedure, and/or when regulatory rules change.

Utilizing in-house and contracted resources -- provide assessment, work scope development, hazard communication, and abatement type services to user types such as facilities services, maintenance department, transportation department, school volunteer groups when and where necessary to prevent subject exposure to building and campus occupants.

Provide lead awareness training to maintenance workers and/or other group who would benefit from subject training.

Procedures: Plant Operations and Maintenance Department

Utilizing work control database (and associated work request/approval modules) the Maintenance Staff (i.e. administrators, work control analyst, supervisors, working leads, etc.) shall look for and prevent any work request where by painted surfaces need to be impacted by sanding, grinding or otherwise abrading painted surfaces on school buildings, entities, and/or equipment.

Inquire with the Office of EH&S as to disposition (presence/absence of Lead) of painted surface to be impacted.

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Procedures: Plant Operations and Maintenance Department - continued

Communicate to the requestor that the surface is presumed to contain lead and poses a health hazard if impacted by sanding, grinding, cutting or abrading, and shall not be impacted until disposition information is received (from the Office of EH&S).

Contact the Office of EH&S if painted surfaces are discovered to be in poor condition (i.e. pealing, flaking, chalking) at a school site.

Procedures: Building Permit and Code Compliance Office

Maintain a flyer defining 40 CFR Part 745 on wall in lobby of Permitting (application) Office, as a reminder to all those who apply for a construction, renovation, repair, remodel permit.

Maintain language on the permit application portion of the office's website defining 40 CFR Part 745 as a reminder to all those who apply for a construction, renovation, repair, remodel permit.

Procedures: Maintenance Projects Office

Maintain a flyer defining 40 CFR Part 745 on wall in the office, as a reminder of federal regulations to project managers, project field coordinators, contractors, and sub-contractors for construction, renovation, repair, remodel permit.

Incorporate abatement plan, schedule, and budget into project plans when/where applicable for renovation and remodel projects and activities.

Allow their personnel to receive periodic lead-based paint hazard training.

Procedures: Schools Based Employees (Principals, Assistant Principals, Head Custodians)

Don't allow your school based employees to impact painted surfaces on any school building walls (interior or exterior) and do not impact painted surfaces on equipment located on school grounds.

Contact the Office of EH&S if painted surfaces are discovered to be in poor condition (i.e. pealing, flaking, chalking) at the school site.

Procedures: Facilities Services (Facilities Planning)

Specify the ban on the use of lead (or any other heavy metal: as defined by RCRA) for all facilities designs.

Procedures: Other District Support Functions (i.e. Transportation Food Services)

Don't allow your employees to impact painted surfaces at the support facility (including equipment).

Contact the Office of EH&S if painted surfaces is discovered to be in poor condition (i.e. pealing, flaking, chalking).