

**PLAN OF WORK FOR REMOVAL/REPAINTING OF COMPONENTS PREVIOUSLY PAINTED WITH
LEAD BASED PAINT (COATINGS)**

***CHILD OCCUPIED FACILITIES, TARGET HOUSING
AND ALL OTHER BUILDINGS AND STRUCTURES***

ACKNOWLEDGEMENTS

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Mr. Chad E. Jordan, Environmental Safety Division, The University of Georgia

Mr. Gene W. Lou, Environmental Safety Specialist, The University of Georgia

Mr. William H. Spain, Georgia Environmental Protection Division, Lead and Asbestos Program

Mr. Alex H. Lehocky, MS, CIH, Environmental & Occupational Safety Program Manager, Board of Regents of The University System of Georgia

Mr. Mark E. Hartz, Vice President, Alternative Construction & Environmental Solutions, Inc.

Mr. Mark Demyanek, Associate Vice President, Georgia Institute of Technology

This document is prepared to compliment current guidance documents provided by USG/BOR. Further this document supersedes all other documents. If clarification is required, contact the USG/BOR Office of Real Estate and Facilities.

INTRODUCTION

This is NOT an abatement specification. An abatement specified project for Target Housing or Child Occupied Facility will have additional requirements and will be authored by a Lead Project Designer with an Occupant Protection Plan and Final Clearance by a Georgia Certified Inspector/Risk Assessor working for a Georgia Certified Firm. As of the authoring of this document, there are limited resources available for an abatement project and Project Design. Most projects with USG/BOR will consist of Paint Stabilization and Component Removal, not abatement per the intent.

- A. It is the intent of this document to be used as guidance for projects that may **disturb** Lead Based Paint (LBP) of any quantity. For the purpose of this document, Lead Based Paint will be described as Lead Based Coatings to include varnishes, shellacs and any other surface coating that could contain Lead.

Georgia EPD defines Disturb as: “to break up, burn, crush, cut into, dissolve, sand, scrape, abrade, remove, demolish, or otherwise manipulate a painted surface in a manner that generates dust, paint chips or debris.

- B. It should be noted that other items may contain lead (i.e. Ceramic tile) that is not considered a coating should be considered potentially hazardous if dust is created. Additionally, other considerations should be made for other Toxic and Hazardous materials such as Asbestos, Cadmium, Chromium, Arsenic etc. and reviewed prior to beginning work. **At no time should soil samples be taken and analyzed without the written permission from an authorized representative of the University System of Georgia.**
- C. Prior to a project (renovation or demolition), all coated materials that are to be disturbed shall be sampled by a GA Certified Lead Inspector working for a GA Certified Lead Firm. In lieu of an inspection, the Responsible Unit Designated Person (this person can be a University Employee, Contractor or outside Consultant) may presume the coating to contain Lead. All projects without a Responsible Unit Designated Person must coordinate with Designated Institution Official (DIO). DIO shall designate all projects as Renovation, Repair and Paint (RRP) and materials to be disturbed may be tested using the approved wet methods (LeadCheck®, D-Lead®) or be presumed to contain Lead.

- D. The selected contractor will be required to complete the GA EPD “RRP Recordkeeping Package for Renovators” found on the GA EPD website:
<http://epd.georgia.gov/sites/epd.georgia.gov/files/RRPblankFiles.pdf>
or contact the Responsible Unit Designated Person or DIO for a copy.

PART 1 – GENERAL

1.01 GENERAL DESCRIPTION OF WORK

- A. The work covered by this plan includes the removal and/or surface preparation of components to be disturbed, as well as the containment of debris from these activities. This work will be conducted on the inside and/or outside of the building at the following location:

Insert Location Information Here

- B. This work will consist of the disturbance of components and coatings that have been previously shown or presumed to contain measurable amounts of lead. This is not a lead abatement project, nor is this project subject to Housing and Urban Development (HUD) guidelines. However, the selected contractor shall comply with 40 CFR 745 Renovation, Repair and Paint (RRP) regulations to include assignment of a Georgia Certified Renovator and be a Georgia Certified Firm and comply with Georgia Lead Based Paint Rules Chapter 391-3-24-.10 Standards for Conducting Renovation Activities. Cleaning Verification shall also be required to be completed by a Certified Renovator. Verification may also be internally by the Responsible Unit Designated Person, DIO or by a 3rd party. Some designated facilities (i.e. residence halls, dining/cafeteria, medical, dental, pharmaceutical etc.) may require the collection and passage of Clearance Sampling by a Georgia Certified Lead Inspector/Risk Assessor.

1.02 DEFINITIONS

- A. Below are definitions specific to working with Lead Based Coatings.
1. Containment – An adequate system of temporary barriers and surface protection used to isolate a work area so that no dust or debris escapes or contaminates surfaces while the renovation is being performed.
 2. HEPA Filter Equipment – A designed, constructed and maintained high efficiency particulate air (HEPA) filtered vacuuming equipment with a filter system capable of collecting and retaining 99.97% of airborne particles with an aerodynamic diameter of .3 microns or larger.
 3. Personal Monitoring – Sampling of lead concentrations within the breathing zone of representative workers within the project crew.
 4. Time Weighted Average (TWA) – The TWA is an 8-hour time weighted average airborne concentration of lead.
 5. Permissible Exposure Limit (PEL) – 50 µg/m³ of air reported as an 8-hour time weighted average.
 6. Action Level (AL) – 30 µg/m³ of air reported as an 8-hour time weighted average.
 7. Title to Materials – All waste materials resulting from demolition and/or removal work, shall be disposed of as specified herein, and title to materials shall remain with owner. Owner may select materials to be recycled or repurposed.
 8. Training – Within twelve (12) months prior to assignment to this lead work project, the Contractor shall instruct each employee with regard to the hazards of lead, safety and health precautions, and the use and

requirements of appropriate personal protective equipment as per 29 CFR 1926.62 and all other applicable regulations.

9. Safety Compliance – In addition to the detailed requirements of these specifications, the Contractor shall comply with applicable laws, ordinances, rules and regulations regarding disturbance, handling, storing, transporting and disposing of waste materials.
10. Respiratory Protection – In lieu of a Negative Exposure Assessment (NEA), the Contractor shall provide workers with respiratory protection equipment approved by the National Institute for Occupational Safety & Health (NIOSH) and shall be used in accordance with OSHA Standards.
11. Decontamination – The Contractor shall provide shower facilities, where feasible, for use by employees whose airborne exposure to lead is above the PEL. Where showers are not provided the employer shall assure that employees wash their hands and face at the end of the work-shift. The employer shall provide adequate hand-washing facilities for use by employees exposed to lead in accordance with 29 CFR 1926.51(f).
12. Consultant – The consulting firm representing the owner for this project is _____ is the Project Designer.

1.03 PRE-WORK SUBMITTALS

- A. Prior to beginning work, at a minimum, contractor shall provide to the consultant and Responsible Unit Designated Person:
 1. Proof of insurance listing owner and also *consultant* as additional insured
 2. Current Georgia RRP Certified Firm Certificate
 3. Current Georgia RRP Certified Renovator assigned to project Certificate
 4. Proof of OSHA 29 CFR 1926.62 training for all workers within the last 12 months
 5. Project schedule with timeline
 6. Detailed plan of work
 7. Negative Exposure Assessment if available

Additional documents to be included in the pre-submittals.

8. _____

9. _____

1.04 CONTINGENCY PLAN

- A. Prepare and submit a contingency/safety plan for emergencies including fire, accident, power failure, pressure differential system failure, supplied air system failures, inclement weather or other events that may require modification or abridgment of decontamination or work area isolation procedures.
- B. Note that nothing in this abatement plan should impede safe exiting or providing adequate medical attention in the event of an emergency.
- C. It is the responsibility of the Contractor to develop, coordinate and post Emergency Response contact information. In lieu of not having a direct contact the Contractor shall dial 911.

1.05 MECHANICAL AND ELECTRICAL SYSTEMS

- A. The OSHA Competent Person representing the Contractor shall take note where mechanical and/or electrical hazards are located and assure the use of necessary precautions in these areas.

1.06 COMPLIANCE WITH OSHA STANDARDS

- A. It is the intent of this section for the Contractor to comply fully with all Federal, State and Local regulations and codes regarding disturbance and disposal of lead containing coatings. Nothing in this section should be interpreted to conflict with this intent. Contractor is responsible to ensure worker safety complies with Occupational Safety and Health Administration (OSHA) safety requirements. Hard hats, eye goggles, gloves, and other personal protective equipment etc. shall be worn when work tasks require this additional safety protection.
- B. No attempt has been made to specify all applicable Federal and/or State requirements dealing with worker safety or public safety within the confines of these specifications. This should not be construed as an abridgment of these requirements. As is always the case, the contractor has the responsibility to determine which non-specified requirements apply to his work and the responsibility to have an OSHA Competent Person initiate steps to comply with these non-specified requirements on an as needed or required basis.

PART 2 – EXECUTION

2.01 DESCRIPTION OF CONTROL AREA:

- A. For the disturbance of lead containing paint/coatings, a safe zone/regulated area will be established by placing barricade tape around the building near the area of work. Only trained personnel will be allowed inside of the barricade tape. For exterior projects, plastic, orange construction fencing shall be used. A decontamination area consisting of a minimum of an adequate hand washing facility, and HEPA vacuum that is designed, constructed and maintained to HEPA efficiency in the area.

2.02 INTERFACE OF CONSTRUCTION TRADES:

- A. During disturbance of lead based paint/coatings from the aforementioned building, only the selected contractors personnel, third party consultants and the owner’s authorized representatives will be allowed to enter the lead control/regulated area.

2.03 DESCRIPTION OF THE WORK:

- A. The lead work includes the disturbance of lead containing coatings, cleaning of the contaminated area, decontamination of equipment, collection and disposal of the contaminated waste from these activities.
- B. The following is a description of the work:

List specific areas or components here

- _____
- _____
- _____
- _____

2.04 EQUIPMENT:

A. *THE FOLLOWING EQUIPMENT AND WORK PRACTICES ARE PROHIBITED*

- Lead coatings shall not be disturbed by using open flame torch burning
- Lead coating shall not be disturbed by using heat guns exceeding temperatures above 1,100 degrees Fahrenheit.
- Lead coating shall not be removed by power equipment unless such equipment is effectively attached to a HEPA vacuum system.

B. The selected contractors personnel, third party consultants and the owner's authorized representatives will be furnished adequate supplies of personal protective equipment for each entry into and inspection of the lead control/regulated area. These personnel must use PPE equivalent to that being used by the work crew and such PPE must be provided by the contractor.

1. Respirators – All individuals entering the lead control/regulated area where levels are found to be above the action level shall be required to wear respiratory protection. The workers shall wear, at a minimum half-face negative pressure respirators as approved by NIOSH for this type of protection while performing this work. The respirators will be used in accordance with Occupational Safety and Health Administration (OSHA) standards.
2. Protective Clothing – Personnel exposed to airborne concentrations of lead in excess of the permissible exposure level shall wear protective whole-body clothing, head covering, gloves and foot covering. The Contractor shall provide disposable whole-body clothing or provide for the cleaning, laundering, and storage of non-disposable protective clothing and equipment.
 - It is the intent of the owner that all persons entering the work area wear disposable foot coverings while in the work area and remove and dispose of them upon leaving the work area to protect the surfaces at all times.
3. Worker Decontamination – When whole body protective clothing is required, a worker decontamination area consisting of a clean area where the workers will put on clean lead work clothes, a decontamination HEPA vacuum and an area for storage of contaminated equipment and removal of dirty clothing prior to exiting the lead control/regulated area will be designated adjacent to the lead control/regulated area.
4. Warning Signs – Warning signs sufficient in size to be clearly legible will be provided at all possible entrances to the lead control/regulated area to prevent accidental entrance to this area by unprotected persons. Work areas below the PEL must be posted with the requirements of 40 CFR 745 RRP. Work areas above the PEL must be posted with the requirements of 29 CFR 1926.62.
5. Tools – A designed, constructed and maintained HEPA filtered vacuuming equipment capable of filtering particles of 0.3 microns or greater at 99.97% efficiency will be placed inside the work area during lead paint disturbance to aid in the clean-up of any debris.
6. Equip all circuits for any purpose entering the lead control/regulated area with ground fault circuit interrupters (GFCI). Locate GFCIs outside the lead control/regulated area so that all circuits are protected prior to entry into the regulated area. Provide circuit breaker type GFCI equipped with test button and reset switch for all circuits to be used for any purpose in the regulated area, decontamination unit, exterior, or as otherwise required by National Electrical Code, OSHA or other authority. Locate the panel exterior to the lead control/regulated area.
 - Use only grounded extension cords; use "hard-service" cords where exposed to abrasion and traffic. Use single lengths or use waterproof connectors to connect separate lengths of electric cords, if single lengths will not reach areas of work.

2.05 WORK PROCEDURES:

- A. Lead disturbance work will be performed in accordance with 29 CFR 1926.62 and 40 CFR 745 and as specified herein. Wet removal, non-powered scraping or HEPA captured powered removal shall be used. Personnel will wear and use protective equipment and clothing as specified herein. Eating, smoking or drinking will NOT be permitted in the lead control/regulated area
1. Cleaning During Work – The Contractor shall clean the work area using HEPA vacuum equipment and/or wet cleaning techniques on at least a daily basis.
 2. Protection of the Ground – The Contractor shall provide a sheet of adequate poly to cover the ground under the area of work. This shall be placed in a manner to prevent any coatings from contacting the ground. This sheet shall be cleaned daily and/or replaced as needed. Vertical containment may be required to minimize ground contamination.
 3. Stop Work – If barriers fail or are breached in any manner, stop work immediately. Do not start work until the situation has been corrected and verified by the Responsible Unit Designated Person or DIO.

2.06 LEAD PAINT HANDLING PROCEDURES:

- A. Wet removal, non-powered scraping or HEPA captured powered removal shall be used to accomplish all work. Other methods can be approved by submitting prior to beginning work to Responsible Unit Designated Person. All projects without a Designated Person must coordinate with DIO for approval.
1. Cleanup and Disposal – During lead disturbance, the lead control/regulated area will be kept free of accumulations of debris in order to restrict the spread of lead dust.
 2. Disposal of the lead debris – All lead wastes and scraps, debris, bags, containers and contaminated clothing shall be placed in appropriate containers for storage. At the completion of the project, if not under the residential waste exemption, each waste stream shall be evaluated to determine if the material shall be handled as hazardous waste. When sampling is warranted, a representative **composite** sample shall be collected of each waste stream and tested for lead content utilizing the TCLP procedure. Any waste stream producing results ≥ 5 ppm lead when analyzed by this procedure shall be transported and disposed of as hazardous waste. This testing will be completed by the owner or third party representative.
 3. Landfills Receipts – Retain receipts from landfill for all disposed materials.
 4. Recycling – Recipients of materials being recycled must be provided with written test results of lead content or a statement of the presumption of lead.

PART 3 – CLEANING VERIFICATION

3.01 INTERIOR CLEANING VERIFICATION

- A. A Visual Inspection shall be conducted and written documentation generated on the GA EPD form by a GA Certified RRP Renovator.
- B. After successfully passing the Visual Inspection, Cleaning Verification per RRP and GA EPD (to include the window trough if required) shall be conducted and documented by a GA Certified Renovator.
- *It should be noted that a Clearance Examination may be required by the owner.*

- C. When interior Cleaning Verification has been completed and documented for all of the surfaces in the work area, (including floors, window sills and troughs), warning signs may be removed.

3.02 EXTERIOR CLEANING VERIFICATION

- A. A Visual Inspection shall be conducted and documented by a GA Certified Renovator using the GA EPD form.
- B. When exterior Visual Inspection has been completed and documented, warning signs may be removed.
- *It should be noted that a Clearance Examination of covered exterior floor surfaces may be required by the owner.*

PART 4 – FINAL PROJECT CLOSE-OUT

4.01 POST SUBMITTALS

- A. At completion of the project, submit copies of the following to the Responsible Designated Unit Person, Consultant and DIO.
 - 1. GA EPD “RRP Recordkeeping Package for Renovators” completed and signed
 - 2. Insurance Certificate for the project
 - 3. Current Georgia RRP Certified Firm Certificate
 - 4. Current Georgia RRP Certified Renovator assigned to project Certificate
 - 5. Proof of OSHA 29 CFR 1926.62 training for all workers within the last 12 months
 - 6. TCLP analysis (if necessitated)
 - 7. Waste manifests, landfill receipts
 - 8. Record of recipient of all materials to be recycled and the notifications provided to them.
- *Additional items as needed to be submitted*
- _____
- _____

Post-submittals shall be submitted electronically. Each section above along with a cover and index shall be in PDF format and each section an independent file. A CD labeled with the project name and PO number shall also be submitted with the PDF files. The post-submittals shall be forwarded to the Responsible Designated Unit Person, Consultant and DIO at the following address within 10 days of project completion.

