

LEAD BASED PAINT

Lead can be present in many areas of the residential and school environments (paint, dust, soil, and water) and can also come from many sources. Some abatement projects may focus on only one of these sources. However, the immediate source of exposure for most children is lead contaminated dust, from all previously identified sources. From a child health point-of-view, it is very important to consider all major sources of lead when conducting an abatement project.

Historically, like many hazardous materials, lead has been regulated by several federal agencies. The Lafayette Parish School Board expects that any work done by contractors and/or consultants will adhere to and be in compliance with all Federal, State, and Local agencies regulating lead testing and abatement activities. When there is more than one regulation governing an act or procedure the most stringent requirements will be followed.

In 1970 the U.S. Surgeon General issued a statement titled "Medical Aspects of Childhood Lead Poisoning" which resulted in Public Law 91-695, the "Lead-Based Paint Poisoning Prevention Act". The LBPPPA has over the years assisted many states, cities, and communities in designing their own lead hazard programs which call for inspections of paint and water, abatement when necessary, public awareness, certified training for workers and/or waste disposal guidelines/regulations.

The Lafayette Parish School Board Lead Based Paint Policy is established to assure that a "Standard of Care" will always be in force when lead abatement work is performed at any of its facilities. Any work done at Lafayette Parish schools will follow the Compliance Program identified on the following pages.

LEAD BASED PAINT POLICY

I. IDENTIFICATION, REPORTING AND RECORD KEEPING OF LEAD-BASED PAINT

Random sampling of pre-1978 buildings using an XRF analyzer, which denotes a reading of 1.0 mg/cm² or greater as a positive finding of lead-based paint with a backup of atomic absorption analysis (bulk sample), if necessary. XRF readings of 3.0 mg/cm² or greater will constitute a positive finding. AAS is positive when finding is 0.5% by weight or higher or 5,000 ppm. EPA/DEQ certified inspectors/supervisors will be used for this phase of the program.

Sampling and Analysis Plan

- *chain of actions associated with each report
 - *responsible individuals
 - *decisions to be made
 - *actions to be taken
 - *an outline of final report
 - *interpretation and presentation of test findings
 - *analysis to be done by a lab accredited by the American Industrial Hygiene Association

Reporting Results of Hazard Identification

- *final report of the hazard testing
 - *location of lead-based paint
 - *concentration of lead-based paint
 - *summary of results
- *periodic progress reports
 - *summary information
 - *plans for next reporting period
- *reports of quality assurance reviews
- *documentation of encountered problems and corrective actions

Records to be Maintained by Lafayette Parish School Board

The following records are to be maintained:

- *which units, common areas, and other Lafayette Parish School Board owned facilities
- *results of testing
- *condition of painted surfaces by location
- *historical data regarding plans for abatement, if necessary
- *description of testing methods
- *documentation that positive test findings were communicated to appropriate parties involved

II. LEAD ABATEMENT POLICY

Lafayette Parish School Board defines lead-based paint as 1.0 mg/cm² or 0.5% by weight. This definition becomes the Board's entry level for initiating a Compliance Program designed To protect children and any workers who may become exposed to a lead hazard found in school buildings within the parish.

Lafayette school system is extremely interested in the prevention of possible lead exposure to its children and workers. Thus, they consider the following as potential action levels for initiating preventative measures for protection of individuals:

| | | |
|------------------------|--------------|----------------------------|
| Lead-Based Paint Dust: | Floors | 200ug/ft ² |
| (Wipe Sampling)-(HUD) | Window Sills | 500ug/ft ² |
| | Window Wells | 800ug/ft ² |
| Soil Samples (HUD) | | 500+ug/ft ² |
| Air (OSHA) | | 30ug/m ³ - 8hrs |
| Water (EPA) | | 15ppb(ug/liter) |

It is the policy of the Lafayette Parish School Board that the aforementioned levels will be used for decision making regarding whether a school building will be abated for lead and if so, a basic compliance program will be initiated as shown:

1. Medical testing (blood lead levels) of any abatement workers coming on the school's grounds. Test findings are to be received prior to start of work and

periodic testing for long term projects. Blood lead levels may also be required of workers at the end of the abatement job.

2. Pertinent and timely training of abatement workers. All should be EPA/DEQ certified. Hazard Communication training is required.
3. Air monitoring data which shows the sources of lead emissions. (Baseline data)
4. A work practice program which includes protective work clothing and equipment, housekeeping requirements, and hygiene facilities and practices.
5. The following hygiene facilities are required at the beginning of lead abatement projects:
 - (a) Change Rooms – separate storage facilities for work and street clothing.
 - (b) Showers (all workers must shower at the end of the work day and more frequently, if necessary).
 - (c) Lunch areas which are separate from the abatement areas.
 - (d) An adequate number of lavatories for frequent washing of hands, etc.
6. Respiratory protection program must be implemented and followed.
7. Abatement air monitoring to determine exposure levels of workers.
8. Clearance sampling using HUD Guidelines which will be performed by a third party certified professional designated by the School Board.
9. Waste generated by abatement process is to analyzed by the Toxicity Characteristic Leaching Procedure (TCLP). Findings of 5ppm will be defined as hazardous waste and disposed of in accordance with applicable federal, state, and local laws.
10. Record keeping procedures will be formulated to represent information relative to all phases of the abatement project. A comprehensive report is to be formulated and presented to the Lafayette Parish School Board.

Adopted: 12/14/94

Lafayette Parish Schools, Louisiana