

**MONMOUTH UNIVERSITY
POLICIES AND PROCEDURES**

Policy Name: Lead Awareness

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Approved by: Grey J. Dimenna, Vice President
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I. POLICY/PURPOSE

- A. Monmouth University is committed to providing the community with a safe and healthy environment. This policy is designed to ensure that University employees follow the appropriate procedures to prevent building occupants, visitors, maintenance personnel and contractors from exposure to hazardous levels of lead and/or lead-based paints. This policy applies to all departments and personnel involved with or affected by activities that may result in the disturbance of lead-containing materials.

II. SCOPE

- A. This policy shall apply to all areas of the University, including Facilities Management, Residential Life, Campus Planning and Construction and all contractors who work at or for the University. All academic, residential and administrative buildings shall comply with the applicable sections of this policy and the regulations from which they were drawn, 29 CFR 1910.1025.
- B. Adherence to this policy will help the University control any active lead hazards and will enable the University to avoid creating any additional lead hazards in the future.

III. ROLES AND RESPONSIBILITIES

- A. Supervisors are responsible for identifying at-risk job tasks within their departments and reporting them in writing to the Director of

Compliance. At-risk job tasks include any job which exposes or is likely to expose a worker to known or presumed harmful lead hazards.

- B. Employees are responsible for following all of the guidelines set forth in the policy.
 - 1. Failure to follow any of these guidelines shall result in disciplinary action up to and including loss of employment.

IV. **TRAINING**

- A. Identified and approved staff shall be properly trained in Lead Safe Work Practices in accordance with the DEP, EPA and OSHA regulatory requirements.
- B. University personnel that have not been trained in the area of lead safe work practices and who do not have the appropriate personal protective equipment shall not engage in this type of work.
- C. Supervisors are responsible to ensure their employees attend initial Lead Awareness Safety training.
- D. Employees are responsible for participating in an initial Lead Safety training.
 - 1. Lead Safety Training shall include the following components:
 - a. The use of personal protective equipment/clothing;
 - b. Engineering controls and work practice controls to reduce lead exposure;
 - c. The applicability, selection and use of respiratory protection;
 - d. Housekeeping/hygiene maintenance; and
 - e. Medical surveillance.

V. **REQUIREMENTS**

- A. No employee, contractor or student may bring or apply any lead-based paint or architectural coating to any University property without the express prior written approval of the Director of

Compliance, Associate Vice President for Campus Planning and Construction and the Director of Compliance and Special Events.

1. All plausible alternatives to lead-based coating must be exhausted before approval will be given to apply new lead-based paint or coating to any University property.
- B. Whenever an employee encounters suspected lead-based paint in a deteriorated condition already existing on a University property, or in the course of work is likely to damage such paint, he/she must observe the procedures outlined in this policy.
- C. If an employee must perform work on an area with a suspected lead-based paint in a manner that is likely to damage the paint, he/she must take definitive steps to ascertain the presence of lead before beginning the work.
 1. No employee may conduct work which will damage a surface coated with a lead-based paint without specific authorization to do so, without proper training, without appropriate personal protective equipment (PPE), and without appropriate engineering controls in place to minimize the ability of lead to escape into the environment.
- D. Engineering Controls
 1. Work on or with lead bearing products must be planned and conducted utilizing the following (or similar) measures to reduce the likelihood of exposing people to lead or allowing lead to escape into the environment:
 - a. **Exhaust ventilation** – power tools used to remove lead-based paint shall be fitted with dust collection shrouds or other attachments so that paint is exhausted through a high-efficiency particulate air (HEPA) vacuum system.
 - b. **Substitution** – materials and chemicals that do not contain lead for all projects should be used whenever possible.
 - c. **Replacement** – lead-based painted building components such as windows, doors and trim should be replaced with new components free of lead-based paint whenever possible.

- d. **Modification** – when applying lead-based paints or other lead-containing coatings, use a brush or roller rather than a sprayer. This application introduces little or no paint mist into the air to present a lead inhalation hazard. Note that pursuant to OSHA requirements, lead-based paint is banned from use in residential housing.
 - e. **Isolation** – When possible, keep any employee not directly involved in the lead work away from the area thereby reducing the risk of exposure.
- E. If in the course of his or her work, an employee has come in contact with deteriorated or damaged lead-based paint, he/she must adhere to the following work practice controls:
 - 1. Workers are required to wash their hands and face after work and before eating to minimize their exposure to lead;
 - 2. Any employee whose airborne exposure to lead is above the permissible exposure limit (PEL) will be provided with a clean changing area in order to remove his/her work clothing and replace it with street clothing.
- F. An employee working on an area with a suspicious coating must report the suspected lead-based paint to his/her supervisor.
 - 1. The supervisor shall discuss the suspect paint or coating with appropriate management personnel before further pursuing work in that area.
- G. If the suspect area cannot readily be determined to be lead-free, the University shall arrange for testing to determine the presence or absence of lead and shall make repair or removal arrangements accordingly.
- H. The New Jersey Department of Consumer Affairs also distributes regulations concerning lead abatement activities. These regulations establish that activities involved in abatement of lead paint must be conducted by a licensed lead abatement contractor. This regulation does not apply to regular construction projects, maintenance or removal activities that necessitate removal of lead paint.
- I. Respiratory Protection

1. Respirators are supplied by the University and often used to supplement engineering controls and work practices to reduce worker lead exposures.
2. Any and all employees issued a respirator will participate in the University's Respirator Protection Program pursuant to 29 CFR 1910.134.

VI. ASSESSMENT AND MONITORING

- A. In assessing the likely presence of lead products in the workplace, the University buildings constructed prior to 1978 are to be considered suspect for containing lead-based paints.
- B. Once identified, lead-based products in University-owned buildings shall be maintained, monitored or abated in accordance with State regulations.
- C. Any projects dealing with the removal of lead or lead-based paint shall be reported in writing to the Director of Compliance.