

APPLICATION

NYU Langone

PURPOSE

To protect employees, patients, students, tenants, and members of the community from exposure to lead.

To comply with regulations and guidelines promulgated by the Occupational Safety and Health Administration (OSHA), the Environmental Protection Agency (EPA), and the New York City Department of Health and Mental Hygiene (NYC DOHMH).

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POLICY AND GENERAL INFORMATION

1.0 Background

High level exposures to lead have long been recognized as a serious health hazard. In recent years, the health effects associated with low level exposures, particularly among young and unborn children, have received much attention. OSHA promulgated two standards (29 CFR 1910.1025 and 29 CFR 1926.62) to protect workers and their families from lead. The EPA has passed legislation to protect children from exposure to lead paint in housing and lead in drinking water. The NYC DOHMH passed Local Law 1 of 2005, also aimed at protecting young children from lead paint poisoning.

This policy describes the program NYU Langone has implemented to prevent lead exposures and comply with regulatory requirements.

2.0 Application

NYU Langone includes NYU Langone Health System (the System), NYU Hospitals Center (including the NYU Lutheran and HJD campuses), NYU School of Medicine, NYU Lutheran Family Health Centers, and all entities that are controlled by the System.

This policy applies to:

- All indoor and outdoor areas of all NYU Langone owned and leased facilities.
- All employees, contractors and consultants of NYU Langone

The primary departments and divisions impacted by the program are:

- Facilities Operations, HJD Facilities Engineering, and Lutheran Facilities (collectively Facilities)
- Real Estate
- Radiation Oncology
- RED+F Design and Construction

3.0 Policy

In order to maximize safety, personnel shall presume that lead is present in the paint in NYU Langone buildings constructed prior to 1978, and on painted metal surfaces (e.g., structural steel, tanks, fire escapes) in all NYU Langone facilities. Lead may also be found in roofing material, cornices, tank linings, electrical conduits, soft solder, and shielding for radiation protection.

NYU Langone's Standard Safety Precautions for In-house Operations and Maintenance Activities (see Safety Policy 145: Interim Life Safety Program) incorporates appropriate controls for many common building maintenance activities involving presumed lead-based paint (LBP), as long as the paint is in good condition. For example, the standard safety precautions are generally adequate for activities such as opening wall cavities, and preparing interior walls, ceilings, doors, door frames, windows, window frames and similar surfaces for painting.

Prior to initiating work where presumed LBP is not in good condition, or other work that will disturb presumed lead-containing material (see Section 3.0), personnel shall obtain approval from Environmental Health and Safety (EH&S) for proposed work practices.

Contractors conducting lead abatement projects or performing renovations, repairs, or painting projects that will disturb LBP in a child-occupied facility, shall possess current EPA Lead-Safe Contractor certification and use only EPA certified lead abatement workers.

4.0 **Scope**

This policy applies to all work that could create lead-containing dust, debris, fumes, or waste. It includes, but is not limited to:

- Demolition or salvage of structures where lead or lead-containing material is present.
- Scraping, sanding, abrasive blasting, welding, cutting or torch burning of lead or lead-containing material.
- Installation of lead or lead-containing material (e.g., lead shielding).
- Mold casting in Radiation Oncology.
- Emergency clean-up of lead contamination.
- Disposal of lead-containing waste.

5.0 **Definitions**

Certified refers to certification under the EPA's Lead-Safe Certification Program.

Child-occupied facility means a building, or a portion of a building, constructed prior to 1978 that is visited regularly by the same child, six years of age or under. Such facilities include, but are not limited to, residences, preschools and day care centers.

Lead abatement refers to activities that are undertaken with the intent of permanently eliminating LBP hazards.

LBP means paint or other surface coating which has a lead content greater than or equal to 1.0 milligram per square centimeter (mg/cm^2) or is greater than 0.5% lead by weight.

OSHA action level means an 8-hour time-weighted average exposure of 30 micrograms of lead per cubic meter of air ($\mu\text{g}/\text{m}^3$).

OSHA permissible exposure limit (PEL) means an 8-hour time-weighted average exposure of $50 \mu\text{g}/\text{m}^3$.

6.0 Responsibilities

6.1 **Environmental Health and Safety (EH&S)** is responsible for:

- Developing the program and collaborating with others to implement and maintain it.
- Coordinating lead investigations.
- Coordinating employee exposure assessments.
- Providing training to any employees who could be exposed to lead levels at or above OSHA's action level.
- Developing exposure control plans for any employees who could be exposed to lead levels at or above OSHA's PEL.
- Approving bid specifications and Health and Safety Plans (HASPs) for contractor work involving lead-containing material.
- Coordinating the response to spills of lead-containing material.
- Coordinating testing of waste to determine if waste is regulated under the Resource Conservation and Recovery Act (RCRA).
- Managing the disposal of lead-containing waste.
- Maintaining documentation for lead investigations, employee exposure assessments, and lead waste disposal.
- Periodically evaluating the program and updating it as needed.

- 6.2 **Vice Presidents** and **Directors** are responsible for compliance within their departments and divisions. Their responsibilities include, but are not limited to:
- Ensuring all their employees, contractors, and other vendors whose work could create lead-containing dust, debris, fumes, or waste are familiar with this policy and comply with it.
 - Ensuring EH&S is notified of any activities under their direction that could create lead-containing dust, debris, fumes, or waste.
- 6.3 **Program Directors** and **Project Executives** are responsible for compliance on their projects.
- 6.4 **Managers** and **Project Managers (PMs)** (e.g., design, construction, renovation, operations, and maintenance) are responsible for implementing and maintaining the program on their projects. Their responsibilities include, but are not limited to:
- Ensuring all personnel (e.g., employees, contractors, and other vendors) who are working on their projects and whose work could create lead-containing dust, debris, fumes, or waste, are familiar with this policy and comply with it.
 - Contacting EH&S in writing and requesting an evaluation of any work that could create lead-containing dust, debris, fumes, or waste.
 - Ensuring work in or immediately outside child-occupied facilities complies with Local Law 1 of 2005.
 - Incorporating appropriate specifications into the bid documents (see Appendix A) if contracted work could create lead-containing dust, debris, fumes, or waste
 - Forwarding the contractor's HASP (see Section 7.5) to EH&S for approval. Ensuring the contractor implements the approved HASP.
 - Arranging a secure location for collection of lead waste from their projects.

Facilities managers are also responsible for:

- Ensuring that any of their employees who could be exposed to lead levels at or above OSHA's action level receive training and medical surveillance.
- Implementing exposure control plans for any of their employees who could be exposed to lead levels at or above OSHA's PEL.

6.5 **Real Estate** is responsible for:

- Complying with all requirements for disclosure of LBP hazards in pre-1978 housing.
- Complying with all requirements of NYC Local Law 1 of 2005.

6.6 **Occupational Health Services (OHS)** is responsible for:

- Developing and implementing a medical surveillance program for lead, if required.
- Maintaining medical records.

6.7 **Employees** who have the potential to create lead-containing dust, debris, fumes, or waste are responsible for:

- Requesting a lead investigation prior to conducting any work that could impact presumed lead-containing material.

Note: As noted in Section 2.0, NYU Langone's Standard Safety Precautions for In-house Operations and Maintenance Activities incorporate appropriate controls for many common building maintenance activities involving presumed LBP, as long as the paint is in good condition.

- Implementing measures to control lead-containing dust, debris, fumes, and waste.
- Participating in medical surveillance and training if EH&S determines they have the potential to be exposed to OSHA's action level for lead.
- Notifying their supervisors of potential exposures and of any pertinent problems.

6.8 **Contractors** who have the potential to create lead-containing dust, debris, fumes, or waste are responsible for:

- Obtaining pre-approval from EH&S for a written Health and Safety Plan (HASP) for the work (see Section 7.5).
- Complying with Local Law 1 of 2005 when working in or immediately outside child-occupied facilities.
- Coordinating all removal of lead-containing waste with EH&S (see Safety Policy 108a).

7.0 **Lead Control Program**

7.1 **Prohibited activities**

Employees and contractors shall not use the following methods on surfaces coated with LBP or primer unless they have pre-approval in writing from EH&S for task-specific exposure controls.

- Torch cutting or open flame burning
- Dry sanding (unless the sander is equipped with HEPA vacuum)
- Open abrasive blasting
- Methylene chloride paint removal in indoor locations

7.2 **Lead investigations**

EH&S shall coordinate lead investigations on a case-by-case basis in preparation for demolition, construction, renovation, or maintenance projects.

- The need for an investigation shall be based on the type, condition, and quantity of presumed lead-containing material, and the potential impact of the project on targeted areas. Targeted areas include child-occupied facilities and pediatric and prenatal units.
- All surveys shall be conducted by EPA certified inspectors.

7.3 **Hierarchy of controls**

- Engineering, work practice, and administrative controls shall be the primary means for controlling lead dust and fumes.
- Employees and contractors shall use engineering, work practice, and administrative controls to minimize exposure to lead, to the extent that such controls are feasible. The recommended basic controls include use of:
 - Local exhaust ventilation
 - Plastic sheeting or hard barriers to isolate the work area from adjoining areas
 - Water misting and a scraper to remove peeling paint
 - A HEPA vacuum or wet methods for cleanup of dust (all surfaces should be maintained as free as practicable of accumulations of dust and debris)

- Clean change areas for workers, with separate storage facilities for work and street clothes
- Showers for workers, where feasible
- Whenever all feasible engineering, work practices, and administrative controls that can be instituted are not sufficient to reduce worker exposure to below OSHA's PEL, personnel shall nonetheless use them to reduce worker exposure to the lowest feasible level and supplement them by the use of respiratory protection.
- Respirators shall be used in accordance with Safety Policy 109: Respiratory Protection.
- Other protective clothing (e.g., disposable full body suits with hoods and shoes; goggles) shall be used, consistent with Safety Policy 119: Personal Protective Equipment.

7.4 **Additional requirements for employees**

- **Exposure assessment**

If it is necessary for employees to do work that could create lead-containing dust, debris, fumes, or waste, their manager shall ask EH&S to evaluate potential exposures.

- Personal air monitoring shall be conducted on employees performing the work.
- OSHA methods of sampling and analysis shall be used.
- Employees shall be notified of the results.

- **Medical surveillance**

OHS will implement a medical surveillance program in accordance with OSHA 1910.1025 (j)(3).

- Medical consultations shall be made available for employees who are, or may be, exposed at or above the action level for more than 30 days per year; upon notification by an employee that they have developed signs or symptoms associated with lead poisoning; or when the employee requests a medical advice about exposures to lead.

- Blood tests for lead shall be analyzed according to the schedule in the OSHA lead standard and within two weeks of the exposure incident.
- Medical removal may be required if elevated blood lead levels persist.

▪ **Information and training**

EH&S shall work with departments/divisions to provide information and training in accordance with OSHA 1910.1025 (l) (1).

7.5 Additional requirements for contractors

- Sample specifications for repainting surfaces coated with LBP are included as Appendix A.
- Prior to commencing the work, the contractor shall establish and implement a written HASP or other submittal that incorporates the following elements, unless contractor can document that the airborne lead levels will not reach OSHA's action level.
 - A description of each activity in which lead is emitted, e.g. equipment used, material involved, controls in place, crew size, employee job responsibilities, operating procedures and maintenance practices.
 - A description of the specific means that will be employed to control airborne lead and, where engineering controls are required, engineering plans and studies used to determine methods selected for controlling exposure to lead.
 - A report of the technology considered in minimizing airborne lead.
 - Air monitoring data which documents the source of lead emissions.
 - A detailed schedule for implementation of the plan, including documentation such as copies of purchase orders for equipment, construction contracts, etc.
 - A work practice program which includes items required under paragraphs 29 CFR 1926.62(g), (h) and (i) and incorporates other relevant work practices.
 - An administrative control schedule required by 29 CFR 1926.62(e)(4), if applicable.
 - A description of arrangements made among contractors on multi-contractor sites with respect to informing affected employees of potential

exposure to lead and with respect to responsibility for compliance with 29 CFR 1926.62 as set-forth in 29 CFR1926.16.

- A description of procedures for collecting and discarding waste.
- Other relevant information.

- Contractor shall notify NYU Langone's PM prior to commencing any work covered by the HASP.

7.6 Disposal of RCRA-regulated lead waste

- EH&S shall coordinate testing to determine if waste that contains lead is RCRA-regulated.
- EH&S shall contract with a permitted hazardous waste hauler for the transport and disposal of RCRA-regulated waste.
- The waste hauler shall transport the RCRA-regulated waste to an approved disposal facility.
- EH&S shall maintain and track waste manifests to ensure that waste is received by the disposal facility within the required time period.

8.0 Recordkeeping

8.1 Air monitoring and medical surveillance records shall be maintained for 40 years, or 20 years plus the duration of employment, whichever is longer. Training records shall be maintained for a minimum of one year following the last day of employment.

- EH&S maintains documentation for lead investigations and exposure monitoring.
- OHS maintains medical surveillance records.
- Real Estate maintains records for disclosure of LBP hazards in pre-1978 housing.
- Each department/division maintains its training records; EH&S may maintain copies.

9.0 Access to records

Training records and personal exposure monitoring records for employees are available to the employees, employee representatives, OSHA and NIOSH in accordance with 29 CFR 1910.20.

10.0 Program evaluation

EH&S shall evaluate the Lead Management Program as part of the annual evaluation of NYUHC's Hazardous Materials and Wastes Management Plan.

Related Safety Policies

- 108a: Hazardous Waste from Contractors
- 109: Respiratory Protection
- 119: Personal Protective Equipment
- 120: Contractor Safety Requirements
- 138: Confined Space Entry
- 143: Hot Work
- 145: Interim Life Safety Program

Appendix A	Sample Specifications for Preparing Surfaces Coated with LBP
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Replaces	05/2016
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Summary of Revisions

Revision date	Section	Changes
February 2017	Application	Changes NYULMC to NYU Langone
	2.0	Moves Application from Section 4.0 to Section 2.0 Defines NYU Langone
	3.0	Becomes Policy
	4.0	Becomes Scope
	Review by	Adds review from HJD, NYU Lutheran, and LFHC Environment of Care Committees

May 2016	1.0	Moves Background from Section 4.0 to Section 1.0
	4.0	Adds NYU Langone Health Systems and Lutheran Facilities
	Summary of Revisions	Adds Summary of Revisions

Sample Specifications for Preparing Surfaces Painted with LBP

Qualifications

Trained and certified lead-abatement contractors and workers shall be used to perform the project. Each supervisor and worker assigned to the project must have EPA certification available at the project site. Contractors must possess an EPA Contractor Certification Number.

Training

- a) The workers who remove paint shall be trained as required under the OSHA Lead in Construction standard 1926.62 and shall be certified by EPA as lead abatement workers as per EPA/HUD lead paint regulations.
- b) The work shall be supervised by a trained competent person who is an EPA certified lead paint supervisor and is fully knowledgeable of general renovation techniques, including LBP abatement.
- c) The supervisor shall be trained on engineering controls and good work practices relating to lead paint abatement and on the importance of adherence to these controls and practices.

Personnel protection

Any work that may produce lead airborne dust or fumes shall be conducted by trained workers using engineering controls and work practice controls to prevent exposure to lead dust and fumes and wearing appropriate personal protective equipment (PPE).

- a) Respiratory protection shall be worn at all times during lead abatement activities by all individuals performing the work or those in the work area who may be exposed to lead dust or fumes.
- b) Hand scraping of paint shall require half mask tight fitting respirators with N100 cartridges.
- c) The contractor shall perform personal monitoring for lead exposure. The following are the minimum respiratory protection requirements based on air sample results:
 - i. Air lead levels of 500 ug/m^3 or less: Half-mask air purifying (protection 10X) respirator with high efficiency filters; or half-mask supplied air respirator operated in demand (negative-pressure) mode.
 - ii. Air lead levels between 500 ug/m^3 and $1,250 \text{ ug/m}^3$: Loose fitting hood or helmet (protection 25X) powered air purifying respirator with high efficiency filters; or hood or helmet supplied air respirator operated in continuous-flow mode (e.g., type CE abrasive blasting respirators operated in a continuous flow mode).
 - iii. Air lead levels between 1250 ug/m^3 and ug/m^3 : Full facepiece air purifying (protection 50X) respirator with high efficiency filters; tight fitting powered air purifying respirator with high efficiency filters; full facepiece supplied air respirator

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- operated in demand mode; half-mask or full facepiece supplied air respirator operated in a continuous-flow mode; or full facepiece self-contained breathing apparatus (SCBA) operated in demand mode.
- iv. Air lead levels between 2500 ug/m³ and 50,000 ug/m³: Half-mask supplied air (protection 1,000X) respirator operated in pressure-demand or other positive pressure mode.
 - v. Air lead levels between 50,000 ug/m³ and 100,000 ug/m³: Full facepiece supplied air (protection 2,000X) respirator operated in pressure demand or other positive pressure mode (e.g., type CE abrasive blasting respirators operated in a positive pressure mode).
 - vi. Greater than 100,000 ug/m³, unknown concentration or firefighting: Full facepiece SCBA operated in pressure-demand or other positive pressure mode (protection over 2000X).
- d) Only approved National Institute of Occupational Safety and Health (NIOSH) respirators shall be used. Respirators shall be properly fitted for all persons working at the site.
 - e) The manufacturer's instructions shall be followed for maintenance, proper fit, use of appropriate cartridges, cleaning, repair, replacement of defective parts, appropriate storage, and frequency of cartridge replacement for the specific respirator in use.
 - f) Respirators shall not be removed while in the work site or work area.
 - g) Additional respiratory protection by supplemental filters, such as organic vapor cartridges, may be needed when handling some coating or stripping products. Consult the Safety Data Sheets (SDS) or the manufacturer and obtain the proper filters as necessary.
 - h) Individuals at the work site shall wear full body suits with hoods and shoe covers. A TYVEK or similar type of disposable suit may be worn. Disposable suits shall be used once, and properly discarded. Protective clothing, as described above, and other PPE shall be put on prior to entering the work site or work area. Protective clothing shall be worn in the work site or work area until it has been thoroughly cleaned as described in clean-up activities. Protective clothing shall be changed before leaving the work site or work area and non-disposable suits shall be laundered separately. An area other than the work site or work area shall be provided for persons to put on suits and other PPE and to store their street clothes.
 - i) Goggles with side shields shall be worn when working with a material that may splash or fragment, or if protective eye wear is specified on the Safety Data Sheet (SDS) for the product.

Paint removal methods

Abatement of lead-paint shall not employ the following methods:

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- open flame burning
- dry-sanding
- open abrasive blasting
- uncontained hydro-blasting
- methylene chloride for interior use

Removal of lead-paint shall employ only the following methods:

- nonflammable chemical strippers which do not contain methylene chloride, except that chemical strippers containing methylene chloride may be used for localized touch-up
- Manual scraping using a HEPA vacuum cleaner to collect dust
- Sander equipped with HEPA vacuum

Warning signs

- a) Warning signs shall be posted at all approaches to the work area. The warning sign shall indicate a warning that the area is a lead work area. Lettering shall be at least 1" high and bold.
- b) The work area shall be vacated of non-abatement personnel.
- c) Tenant Notification: At least 3 days before removing, enclosing, or encapsulating lead paint, post caution signs immediately outside all entrances and exits to the work site. In emergency situations posting shall be done as soon as possible. Keep the caution signs posted until the lead abatement is completed. The caution signs shall meet the following specifications:
 - i. the sign shall be at least 20" by 14", and state the date and place of the lead abatement project; and
 - ii. the sign shall include the phrase "Caution, Lead Hazard, Keep Out" or "Warning, Lead Work Area, Keep Out" in bold lettering, at least two inches high.

Hygiene practices

- a) Eating, drinking, smoking, and applying of cosmetics are not allowed in the work site or work area. Any person leaving the work site or work area shall rinse his or her mouth with potable water and wash hands and face thoroughly before eating, drinking or smoking.
- b) Decontamination enclosure systems shall be installed/constructed outside the work area and/or at the entrance to the work area. The personal decontamination enclosure system shall be of sufficient size and dimensions to accommodate the largest anticipated work shift and shall be maintained to ensure all workers can properly use the system. A waste storage area

Sample Specifications for Preparing Surfaces Painted with LBP

shall be established. Decontamination enclosures shall be equipped with curtained doorways (air locks) and shall have lockable doors for off hours.

- c) All individuals shall wash or shower before leaving the work site or work area for the day.
- d) A lavatory facility or potable water supply or a portable decontamination unit shall be provided and located at the work site or work area for the washing of hands and face and for clean-up activities.

Work procedures (exterior paint removal)

Before beginning to abate the lead-containing paint:

- a) Seal all windows on the level of work and all levels below the work.
- b) For all sealing and covering of windows and interior and exterior abatement work, use the following:
 - i. Plastic sheeting, at least 6 mils thick or equivalent;
 - ii. Polyethylene sheeting shall be sufficiently overlapped and all joints shall be fully sealed. Polyethylene sheeting shall be fire retardant and have a minimum thickness of 6-mil. Floor surfaces shall be contained with two (2) layers of reinforced, fire retardant 6-mil polyethylene sheeting.
 - iii. Duct tape or equivalent waterproof tape spray adhesives; or other additional appropriate work practices to contain particulate lead or lead-containing liquids.
- c) For removal of the lead paint by manual scraping the following precautions shall be followed:
 - i. When water/liquid waste is produced by any abatement technique used, plastic sheeting at least 6 mils thick shall be placed on the ground, as close as possible to the building foundation, or on the floor when applicable. Sheeting placed on the ground or floor shall be raised at its edge and extended a sufficient distance to contain the liquid waste.
 - ii. When non-liquid waste is produced by any abatement technique used, plastic sheeting at least 6 mils thick shall be placed on the ground, as close as possible to the building foundation, or on the floor when applicable. Sheeting placed on the ground or floor shall extend out from the foundation 3 feet per story being abated, with a minimum of 5 feet and a maximum of 20 feet.
 - iii. Sheeting shall be secured at the foundations and along all edges and seams.

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- iv. If the wind speed causes visible dust during an exterior abatement project producing dry waste, abatement shall not be continued or performed unless vertical shrouds are erected.

Cleanup of work site

After completion of each day's work the site shall be completely cleaned by removing plastic sheeting and HEPA vacuuming surfaces:

Daily cleaning at end of shift

- a) The dust and debris collection method shall be selected in conjunction with the paint removal method to assure the methods are compatible and can be integrated.
- b) Dust and debris may be collected from the surface at the point of removal or from the general work area.
- c) Debris shall be collected on a regular basis and shall not be left to accumulate in the work area during the course of removal. Collection of debris from ground covers and horizontal surfaces shall occur while the material is wet using acceptable means that are not destructive to the containment materials.
- d) Deposit all lead waste, including sealing tape and plastic sheeting, in double plastic bags at least 4 mils thick or single bags 6 mils thick or equivalent, and seal the bags.
- e) Before washing, vacuum-clean all surfaces in the work site including, walls, windows, window wells, and fire escape and scaffolding with a HEPA vacuum.
- f) After vacuum-cleaning, wet wash all surfaces in the work site including walls, windows, window wells, scaffolding floors and the fire escape with a solution containing a phosphate-free detergent.
- g) If visible residue remains after washing and allowing all surfaces to dry, vacuum all surfaces with HEPA vacuum.
- h) Deposit all lead waste from clean-up, including mop heads, sponges, filters, and disposable clothing, in double plastic bags at least 4 mils thick or single bags 6 mils thick, and seal the bags.

Final clean-up

- a) After removal of the paint, all surfaces shall be wet wiped and HEPA vacuumed.
- b) A visual inspection shall be performed by the contractor lead abatement supervisor to confirm the absence of dust and/or debris and that abated surfaces are clean of residual paint.

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- c) The polyethylene sheeting shall be removed by folding inward so that residual dust and/or debris are within the polyethylene sheeting.
- d) A second visual inspection shall be performed by the contractor lead abatement supervisor to confirm the absence of dust and/or debris.
- e) As a prerequisite to commencement of clearance air monitoring, a thorough visual inspection by the NYU Langone Project Manager or his/her designee shall verify the absence of residual paint and dust/debris from the work area.

Air Monitoring/Sampling

- a) Daily area air samples shall be collected on representative workers performing the work as well as in the vicinity, but outside the work area containment barriers to assure the action level is not exceeded outside containment.
- b) Personal samples and area monitoring air samples shall be collected and analyzed in accordance with NIOSH method 7082 Lead by Flame Atomic Absorption Spectrophotometry (AAS) with 24-hour turnaround time by an ELAP certified laboratory (or other validated NIOSH method). The results of area air samples shall be posted daily at the beginning of the work shift.

Waste Disposal

- a) Make arrangements, 1 month in advance of project start date, with NYU Langone Environmental Health and Safety for waste disposal.
- b) Place LBP chips, debris, and lead dust in double 4-mil or single 6-mil polyethylene bags or equivalent that are air-tight and puncture-resistant. Pieces of wood or other large items that do not fit into plastic bags shall be wrapped with double 4-mil or single 6-mil plastic sheeting and sealed.
- c) Place all disposable cleaning materials, such as sponges, mop heads, filters, disposable clothing, and brooms in double 4-mil or single 6-mil plastic bags, or equivalent, and seal.
- d) Remove plastic sheeting and tape from covered surfaces. Prior to removing the plastic sheeting, the sheeting shall be lightly misted in order to keep dust down and folded inward to form tight small bundles to bag for disposal. All plastic sheeting shall be placed in double 4-mil or single 6-mil thick plastic bags, or equivalent, and shall be sealed.
- e) Bag and seal vacuum cleaner bags and filters in double 4-mil or single 6-mil thick plastic bags or equivalent.
- f) Place all contaminated clothing or clothing covers used during abatement and cleanup in plastic bags for disposal prior to leaving equipment room, work site or work area.

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- g) Place solvent residues and residues from strippers in drums made from materials that cannot be dissolved or corroded by chemicals contained in those solvents and strippers. Solvents shall be tested to determine if they are hazardous. Solvents and caustic and acid waste shall not be stored in the same containers.
- h) Contain and properly dispose of all liquid waste, including lead dust contaminated wash water.
- i) HEPA vacuum the exterior of all waste containers prior to removing the waste containers from the work site or area and wet wipe the containers to ensure that there is no residual contamination. Containers that have been cleaned shall be moved out of the work site or area into a designated storage area.
- j) Carefully place the containers into the truck or dumpster used for disposal.
- k) Ensure that all waste is transported in covered vehicles to an approved landfill.

Records

Contractor shall maintain accurate and complete records of items listed below for a minimum six years.

- Inspections and work reports.
- Complete description of the abatement work area and abatement surfaces.
- Complete records of any changes in work procedures.
- List of all trained and certified workers on the project.
- List of PPE used throughout the entire project.
- Activities by regulating agencies.
- Air monitoring and test results.
- Disposal, test results and disposition of waste.