

LEAD MANAGEMENT PROGRAM

Purpose

The purpose of this guideline is to summarize Yale University's policy on lead management for the university community of staff, students, faculty and others on campus. The goal of a management plan is to protect individuals from exposure to lead hazards through the application of administrative and engineering controls. This plan outlines the university's policies regarding the day-to-day maintenance of lead hazards and the planned or accidental disturbance of lead. This program is not a substitute for proper lead training and is not a complete reference for lead information. Please consult the applicable regulations referenced at the end of this report, or contact the Office of Environmental Health and Safety for more information.

Introduction

Lead is a naturally occurring, highly toxic soft metal that can be found in the earth's crust. Because lead is very pliable, it was a valuable resource for manufacturers and was used for many years in building products such as pipes, rods, paints, and containers. Lead can be found in all parts of our environment due to human activities including burning fossil fuels, mining, and manufacturing. Due to health concerns, lead from paint, gasoline, ceramic products, caulking, and pipe solder has been significantly reduced in recent years. All paint has the potential to be lead-based if installed before 1978 unless testing proves otherwise. The year 1978 was when lead-based paint was banned for consumer use nationwide. Yale University (Yale) has a large number of buildings that were painted before 1978.

The mere presence of lead-based paint in a building does not mean that the health of the building occupants is endangered. When left undisturbed and in good condition, lead-based paint does not pose a health threat to building occupants.

The Office of Environmental Health and Safety has Certified Lead Inspectors and equipment to determine potential lead issues on campus.

Graduate Housing Office and leasing agents

EPA regulations apply in targeted housing and child-occupied facilities built before 1978 only. Target Housing is residential housing built before 1978 including private housing and public housing. At Yale University, apartments and any residential properties are included in target housing. Target housing does not include the following: housing built after 1978; zero bedroom units such as efficiencies, lofts, and dormitories; housing leased for less than 100 days; housing for the elderly; and rental housing inspected by a certified inspector and found to be free of lead-based paint.

The following requirements dealing with housing must be followed:

1. The EPA Booklet "Protect Your Family From Lead in Your Home" must be given to each tenant whenever a lease is signed. A signature must be obtained from the tenant acknowledging receipt of the booklet.
2. Any known lead-based paint or lead hazards must be disclosed to potential renters. Summary letters, inspection reports, and information shall be updated and provided by March 1 of each year.
3. The EPA Booklet "Protect Your Family From Lead in Your Home" and renovation disclosure must be given to each tenant when any renovation/remodeling/repair activities (disturbing

more than 2 feet of paint) occur in his apartment or building common areas. A signature must be obtained from the tenant acknowledging receipt of the booklet.

4. Qualified professionals must perform any lead abatement/inspection/assessment work.
5. Paint must contain at least 1.0 mg/cm (by XRF) or 0.5% by weight for chip analysis to be considered lead-based.

Lead Abatement Contractors: All outside lead abatement contractors are to follow all and federal regulations regarding lead containing materials. All contractors are required to be pre-qualified by the Office of Environmental Health and Safety.

APPLICABLE LEAD REGULATIONS

“Lead in Construction” (OSHA 29 CFR 1926.62)

“Requirements for Lead-Based Paint Activities in Target Housing and Child-Occupied Facilities” (EPA 40 CFR 745)

“Requirements for Hazard Education Before Renovation of Target Housing (EPA 40 CFR Part 745)

“Identification of Dangerous Levels of Lead” (EPA 40 CFR 745)

Guidelines/Standards:

Paint:

There is no universal definition of lead-based paint. Since 1977, The Consumer Product Safety Commission has limited the lead in house paints to 0.06% (600 ppm by dry weight).

<p>Lead-based Paint Definition: (The Lead Exposure Reduction Act, Section 401, Title IV, TSCA amendment, Public Law 102-550, 1992; Title X of the 1992 Housing and Community Development Act)</p>	<p>>0.5% (5,000 ppm) or >1.0 mg/cm²</p>
<p>Lead-free Paint Definition: (Consumer Product Safety Act, CPSA 15 USC 2057-8, 1978)</p>	<p><0.06% (600 ppm)</p>
<p>Lead-based Paint Definition: (State of Connecticut & City of New Haven)</p>	<p>>0.5% (5,000 ppm) or >1.0 mg/cm²</p>