BOWDOIN COLLEGE
LEAD-BASED PAINT MANAGEMENT POLICY

Purpose

The purpose of this policy is to provide information to employees of Bowdoin College regarding the management of lead-based paint (LBP) in campus buildings, in accordance with OSHA 29 CFR 1910.1025, EPA 40 CFR 745 Subpart E, and the Lead-Based Paint Renovation, Repair, and Painting (RRP) Program rule as outlined in EPA-740-F-08-003.

Scope

This policy applies to all employees of the College who may be occupationally exposed to hazardous materials or conditions in the workplace due to the presence or suspected presence of LBP, including those employees responsible for managing renovation, repair, or painting projects conducted by certified contractors.

Program Components

1. **Policy Administrator.** The Manager of Environmental Health and Safety (EHS) will be the policy administrator.

2. **LBP Identification.** For purposes of compliance, it is to be assumed that buildings, materials or components constructed or installed prior to 1978 contain LBP unless certified testing by EPA-approved methods indicates otherwise, and their renovation, repair, or painting will be managed as such.

3. **Building Identification.** A “child-occupied facility” is defined as a residential, public, or commercial building, or portion of a building, constructed prior to 1978 which is visited regularly by the same child under 6 years of age on at least two different days within any week, provided that each day’s visit lasts at least 3 hours and the combined weekly visits last at least 6 hours, and the combined annual visits last at least 60 hours. This includes single- or multi-family rental properties, daycare facilities, and preschools; it does not include privately owned homes, unless a portion of said home is being used for one of these purposes for compensation.

For the purposes of this policy, the following College properties are identified as having been constructed prior to 1978 and potentially child-occupied:

<table>
<thead>
<tr>
<th>College Residences:</th>
<th>8 Cleaveland St</th>
<th>42 Harpswell St</th>
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<tbody>
<tr>
<td></td>
<td>16 Cleaveland St</td>
<td>44 Harpswell St</td>
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<tr>
<td></td>
<td>18 Cleaveland St</td>
<td>66 Harpswell St</td>
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<td></td>
<td>15 Coffin St</td>
<td>30 Longfellow St</td>
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<td>25 Coffin St</td>
<td>31 Longfellow St</td>
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<td></td>
<td>84-86 Federal St</td>
<td>32 Longfellow St</td>
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<td></td>
<td>75 Federal St</td>
<td>234 Maine St</td>
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<td>79 Federal St</td>
<td>271 Maine St</td>
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| Children’s Center:  | 6 South St      |
4. **Exemptions.** Employees of the College and uncertified contractors may continue to perform renovation, repair, or painting projects in College facilities where at least one of the following exemptions are met:

- The building is of post-1978 construction;
- The building is not an identified “child-occupied facility” as defined by regulations;
- The project is limited to minor maintenance and limited square-footage (6sf interior or 20sf exterior), does not generate significant dust or debris, and does not include rule-specified tasks such as window replacements.

5. **Contractor Certifications.** Prior to engaging in renovation, repair, or painting projects not meeting the exemption standards outlined above, the vendor will provide proof of EPA-approved certification and training for the firm and the employees performing the project, respectively. This documentation will be maintained in the vendor’s contract file, and included in the annual contract renewal package.

6. **Lead-Safe Work Practices.** Best management practices specifically designed to reduce the generation of and exposure to dust and debris containing LBP at a work site include but are not limited to the following:

- Persons conducting renovations, repairs, and painting projects will be properly trained and/or certified for the extent of the work to be undertaken. College employees and uncertified contractors may perform minor maintenance where an exemption applies as outlined above; only certified contractors may conduct projects where the RRP rules fully apply.
- For interior projects, the work area will be contained with plastic sheeting to prevent dust and debris from leaving the work area, and be clearly posted and access-controlled to prevent unqualified persons from entering. Ducts, windows, doors, and floors will be covered with plastic sheeting and taped in place.
- For exterior projects, all doors and windows within 20 feet of the work area will be closed; doors that are needed for access to the work area will be covered with loose plastic sheeting as a pass-through barrier. The ground area within at least 10 feet of the work area will also be covered with plastic sheeting to collect falling debris. Weather conditions may also dictate the use of vertical sheeting to prevent dust and debris from leaving the work area.
- Workers will wear personal protective equipment appropriate to the project, at a minimum an N95 filter mask and safety glasses.
- Wastes will be containerized as they are generated, and those containers closed before leaving the contained work area. Personnel, tools, and equipment will be wiped down for dust and debris, and the cleaning materials also containerized as waste before leaving the work area.
- Upon completion of the project, the walls, floors, equipment, and fixtures in the work area will be wiped down and/or cleaned with a HEPA vacuum, the dismantled plastic sheeting containerized as waste for disposal, and a visual inspection conducted by certified personnel.

Prohibited work practices include but are not limited to the following:

- Removing LBP using heat or open flames, as this produces potentially lead-containing fumes.
- Removing LBP using high-speed operations such as sanding, grinding, planing, or abrasive blasting, unless the machines being used are equipped with HEPA exhaust controls.
7. **Notification, Documentation, and Recordkeeping.** The representative of the College responsible for the project being contracted will be responsible for the following when conducting work in the identified buildings listed above:

- Providing prior notice of planned renovation, repair, or painting projects to the occupant(s) of the building.
- Providing a copy of *Renovate Right*, the EPA’s lead hazard informational pamphlet, to the occupant(s) of the building and having them sign the *Pre-Renovation Disclosure Form* documenting receipt of same.
- Posting informational signs indicating the nature, location, and dates of the planned renovation, repair, or painting project.
- Obtaining a copy of the *Renovation Recordkeeping Checklist* from the vendor upon completion of the project.
- Maintaining all documentation, including those for vendor and employee training, on file for at least 3 years.

8. **Employee Training.** The EHS Manager will provide initial and annual Awareness Level training for employees who may be exposed to LBP in the course of normal operations and maintenance, or who are responsible for managing renovation, repair, or painting projects. Records of training will be kept by the EHS Office and Human Resources for 3 years. Training shall include (at a minimum) the following components:

- Potentially LBP-containing materials that may be encountered;
- The potential health effects of LBP exposure, and requirements for medical monitoring;
- How to identify and contain LBP during renovation, repair, or painting;
- Worksite precautions to be taken, such as postings, engineering controls, personal protective equipment, and lead-safe work practices; and
- The general requirements of the OSHA and EPA regulations.

**Program Review**

This written program will be audited by the EHS Manager, and the Directors of Facilities Operations and Maintenance and Capital Projects, at least annually.