

Dickinson

Lead Based Paint Management Plan

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Table of Contents

Lead Based Paint Management Plan..... 1
I. Introduction: 3
II. Scope:..... 3
III. Purpose:..... 3

I. Introduction:

Lead based paint was commonly used in buildings up until 1978 when its use was banned. Any buildings painted prior to 1978 are assumed to contain lead-based paint (LBP) unless inspected by a certified inspector and found to be lead free, or documentation on-hand indicates that lead abatement previously occurred during a renovation of the building. Section 1018 of the Residential Lead-Based Paint Hazard Reduction Act of 1992 (Title X) requires sellers or lessors of housing built before 1978 to disclose to buyers or renters that the housing may contain lead-based paint, and to provide available information about the actual presence of lead-based paint and/or lead-based paint hazards in the housing. The purpose of this rule is to protect the public from exposure to lead from paint, paint chips, and dust. This lead-based paint management plan addresses lead-based paint disclosure and the demolition or renovation of residential buildings that may be considered target housing – those in which children under the age of 6 reside. Non-child occupied buildings should be evaluated on a case-by-case basis to determine if lead abatement is required.

II. Scope:

This policy covers all residences owned or sold by the college that were built before 1978, except for the following: residences inspected by a certified inspector and found to be free of lead, dormitories, leases with terms less than 100 days such as vacation houses and short term rentals.

III. Purpose:

The purpose of this policy is to identify methods for determining and disclosing the presence or absence of lead-based paint in properties leased or sold by the College, and protecting children during renovation, repair, and painting activities that disturb lead-based paint.

I. Determining the Presence of Lead-Based Paint

- A. Facilities Management shall identify the use of lead-based paint on interior and/or exterior surfaces of the buildings in pre-1978 residences by interviewing employees who may have prior knowledge and review of written records of paint use and purchases.
- B. If the presence of lead-based paint is confirmed or there is a lack of information regarding the property, a visual inspection of the property will be conducted to document the condition of the interior and exterior surfaces. Documentation shall be provided to the Department of Compliance and Enterprise Risk Management.
- C. Yearly inspections of the property will occur until the property is sold or documentation exists indicating the absence of lead-based paint.

II. Disclosure Process

- A. Dickinson College shall disclose all known information (including copies of survey reports and laboratory analysis) regarding lead-based paint hazards in properties leased,

sold, or renovated by the College using the lead-based paint disclosure form (Appendix A) to be signed by the renter or purchaser.

- B. Disclosure forms shall be maintained by the Department of Compliance and Enterprise Risk Management for as long as the rental agreement is active and for a minimum of 3 years after the rental agreement is terminated. Disclosure forms for properties renovated or sold by the College shall be maintained for a minimum of 3 years.
- C. Dickinson College shall provide purchasers or lessees with copies of the EPA pamphlet titled “Protect Your Family From Lead in Your Home.”
(<http://www.epa.gov/lead/pubs/leadpdf.pdf>) (Appendix B)

III. Renovation Projects

Dickinson College renovation projects adhere to the following guidelines:

- Prior to renovation work, provide pamphlet titled “Protect Your Family From Lead in Your Home” and obtain signature of adult occupant or document attempted delivery (Appendix C)
- Conduct the renovation work or paint over the existing surface IF
 - existing painted surface is in good condition (not flaking or falling off the wall)
 - and**
 - the workers/contractors are not planning to use “abrasive” work practices or surface preparation methods (such as scraping, sanding, etc.)
- Retain a Certified Lead Inspector/Risk Assessor to test the paint before renovation IF
 - Existing painted surface is flaking or otherwise in poor condition
 - OR**
 - the workers/contractors will use abrasive work practices or surface preparation methods

The Inspector/Assessor should determine if the LBP must be removed, or if other control methods such as worker personal protective equipment (PPE) are appropriate to prevent harmful exposures to renovation workers or the facility environment.

- For certain minor “spot” renovations or repairs (less than 2 square feet), safe work practices such as employee lead exposure awareness training, PPE and containment methods may be used in lieu of detailed risk assessment and abatement procedures by “certified” personnel.

IV. Demolition Projects

Demolition projects only require LBP removal when harmful exposures to demolition workers or the surrounding environment may occur as a result of the demolition activity. If it is determined a potential personnel or environmental risk could occur, appropriate control measures should be implemented. Appropriate control measures may include complete LBP removal, partial LBP removal, removal of structural components containing LBP, or other worker/environment protection techniques.

V. LBP Containing Waste

All LBP containing waste must be properly characterized and disposed of in accordance with local, state, and federal regulations. (40 CFR 261.3, 261.24, 262.40 (c), and 25 Pa Code 262a). If samples of the demolition debris do not pass a Toxic Characteristic Leaching Procedure (TCLP test - the debris contains more than 5 ppm of lead), the debris must be disposed of as hazardous waste.

References:

1. [A Guidance Document for University System of Georgia Facilities](#)
2. [40 CFR 745.233](#)
3. [EPA Document 901-F-03-003, "Colleges and Universities: Lead-Based Paint Hazards"](#)
4. [EPA Document 747-K-99-001, "Protect Your Family From Lead in Your Home"](#)

APPENDIX A: LBP DISCLOSURE FORM

APPENDIX B: EPA LBP PAMPHLET

“PROTECT YOUR FAMILY FROM LEAD IN YOUR HOME”

APPENDIX C: LBP RENOVATION ACKNOWLEDGEMENT AND CERTIFICATION