

10.21.22

LEAD EXPOSURE

WE LEAD THE WAY ON LEAD SAFETY.

PURPOSE

It is the policy of the Company, that we will subcontract out to a qualified subcontractor the removal of any materials that have lead on them. For inspections, walk-throughs, or other non-evasive tasks, proper training must be completed first.

ROLES & RESPONSIBILITIES

Project Supervision

- Ensure employee-owners have had lead awareness training when applicable.
- Evaluate the jobsite for potential lead-containing materials and potential exposure hazards.
- Ensure compliance with this policy.
- Verify the submittal of a subcontractor lead exposure compliance program if applicable.

Employee-owners

- Must report immediately anytime lead-containing material is discovered or disturbed.
- Must attend and participate in lead awareness training if applicable.

PROCEDURES

Lead Containing Material Identification

- Prior to the start of work, project supervision will request the owner to provide a pre-job survey for lead-based materials, prepared by a qualified consultant.
- If the pre-job survey identifies the potential of lead exposure, or if lead exposure is identified anytime during construction, project supervision shall contact the Safety Manager, or their designate, and the project director for direction on how to proceed with work tasks involving lead-containing materials.
- In the event the owner does not perform the identification of lead-containing materials, the Company will utilize a qualified consultant to perform necessary testing in order to make a determination of the presence of lead-containing material(s) within the Company's scope of work.

Lead Remediation

- If lead is encountered during construction, project supervision will stop work in the affected area and request that the owner remove or abate the material.
- Before resuming work, project supervision will request a written notification that lead-containing material has been abated.
- If the owner requests that the Company manage the abatement work, the Company will utilize only qualified remediation contractors who meet the following:
 - + The qualified remediation contractor will provide a site-specific lead exposure compliance program which includes the following:
 - » Description of work tasks involving lead-containing materials.
 - » Description of available exposure assessment (personal air monitoring) information.
 - » Personal protective equipment, including respiratory protection to be utilized.
 - » Hygiene facilities and practices.
 - » Methods to change into the proper protective clothing in a designated changing area.
 - » The prohibition of eating, drinking, smoking, chewing tobacco or gum, and applying cosmetics.
 - » Methods to remove all surface dust from the protective clothing and equipment, i.e. HEPA vacuum.
 - » Methods for the removal of protective clothing and equipment.
 - » Provisions for washing hands and face
 - » Methods for cleaning protective equipment, including the respirator.

Housekeeping Practices

- Surfaces shall be maintained as free as practical of accumulations of lead.
- Clean-up of floors and other surfaces where lead accumulates shall be cleaned by vacuuming or other methods that minimize the likelihood of lead becoming airborne. Vacuums shall be equipped with HEPA filters.
- Shoveling (dry or wet), sweeping, and brushing shall be used only where vacuuming or other equally effective methods have been tried and found not to be effective.
- Compressed air shall not be used to remove lead from any surface unless the compressed air is used in conjunction with a ventilation system designed to capture the airborne dust created.
- Methods to inform individuals of potential exposure, such as signage.
- Training methods to be implemented.
- The qualified remediation contractor shall provide the Company with written notification that abatement is complete and work may proceed in the affected area.

TRAINING

- On jobsites where the potential for exposure to lead-containing materials exists, awareness training will be provided as part of the Safety Management Program.