MPS-DFMS ENVIRONMENTAL HEALTH AND SAFETY (EHS) MANUAL

LEAD-BASED PAINT COMPLIANCE PROGRAM

TABLE OF CONTENTS

21.0 LEAD COMPLIANCE PROGRAM

21.1 PURPOSE

This program is composed of two primary components.

- It establishes procedures to protect MPS-DFMS staff and subcontractors from hazards associated with lead and inorganic lead compounds in known concentrations at MPS facilities.
- It creates a lead-based paint renovation program for MPS facilities in order to maintain paint that contains lead in a manner that will protect the building occupants from exposure to lead-containing dust.

21.2 SCOPE

All Milwaukee Public Schools Department of Facilities and Maintenance Services (MPS-DFMS) locations.

21.3 COMPLIANCE STRATEGY

Lead is a cumulative poison that can affect the kidneys, liver, and brain and lead to seizures, coma, and death. Lead poisoning can occur from acute or chronic exposures and cause either temporary or permanent damage. Lead may be absorbed into the body by inhalation (breathing) and ingestion (eating). Very small amounts of lead that may be unintentionally ingested via eating, drinking, or smoking on the job can be harmful. Good personal hygiene is essential on any project where lead-based materials are present. It is very important that all DFMS staff and contracted workers follow the proper precautions when working with materials that contain lead.

This plan is to minimize the potential exposure to lead and inorganic lead compounds in a manner consistent with the requirements set forth by the OSHA Lead in Construction Standard, (29 CFR 1926.62), the Wisconsin Department of Health Services Chapter HFS 163, and the City of Milwaukee Code of Ordinances for Lead based Paint Hazards (Chapter 66-47). As stated previously, this program has two basic parts: one being designed to protect DFMS workers and contractors from exposure to all types of lead hazards and one to effectively maintain lead-based paint in all of its facilities in order to protect building occupants from exposure to lead-containing dust. Each program is detailed separately below. The entire DFMS Lead Compliance Program is available upon request to any affected or concerned MPS employee or authorized worker's representative.

21.4 LEAD EXPOSURE PROGRAM FOR DFMS STAFF & CONTRACTORS

All MPS-DFMS staff and DFMS Contractors must adhere to the following practices and take the safety measures when working with materials that contain lead on any project.

21.4.1 Determining if Lead is Present in the Work Place

If the potential for lead exposure is present in the work place, then the provisions of the OSHA lead standard will apply. The presence of lead may be determined by the scope of work, Safety Data Sheets, historic records, methods of work, or bulk sampling and analysis. Coatings and other treatments that are suspected of containing lead must be tested to verify the lead content before commencing any work that may result in an occupational exposure. If testing has not been performed or there are no available records supporting the absence of lead, its presence must be assumed if lead-containing painted surfaces have been identified on the job site.

21.4.2 Industrial Hygiene Exposure Monitoring

Monitoring must be performed to establish breathing zone concentrations of lead. A full shift 8-hour time-weighted average (TWA) sample is required for each job classification in each work area where exposure levels are anticipated to exceed the OSHA action level of 30 micrograms per cubic meter of air (µg/m^3).

Industrial hygiene exposure monitoring will require that at least one sample be taken for each job classification in each work area demonstrating the highest potential exposure. The sampling must be performed for the entire shift and be representative of the employee's daily exposure. During the initial exposure monitoring all employees will wear protective clothing and respirators.

Reference 29 CFR 1926.62 (d)(2)(B)(iii)); OSHA Construction Standard for Lead.

If the initial employee exposure monitoring results are below the action limit of 30 µg/m^3 as lead or lead compounds, no further sampling is required unless there is a change in materials or work practices. If the initial monitoring shows exposure to lead at or above 30 µg/m^3 but below 50 µg/m^3, personal exposure sampling must be performed every six months for projects or work activities that are sustained for this length of time. Results in excess of 50 µg/m^3 will require industrial hygiene personal exposure monitoring every 12 weeks. Until results of representative air monitoring are received, respiratory protection is required for cutting or torch burning lead-containing surfaces.

Reference: 29 CFR 1926.62 (d)(6).

21.4.3 Employee Notification

Notification of results of industrial hygiene personal exposure monitoring must be given to the worker in writing within five working days after receipt of the results. The workers with exposures exceeding the permissible exposure limit (PEL) must be notified of the results in writing, along with a description of the corrective action taken to reduce the exposure. Subcontractors must provide the MPS-DFMS EHS Shop Supervisor and or Safety Specialist with copies of air sampling results.

21.4.4 Project-Specific Compliance Plan

A written compliance plan (or Exposure Control Plan) is required for all project work where lead exposure levels are suspected to exceed 30 µg/m^3. The written compliance plan shall be established prior to commencement of the work or within 24 hours after exposure sampling shows that levels are at or above 30 µg/m^3. This written compliance plan will be issued in the form of an addendum to the Site-Specific Safety and Health Plan. Engineering and work practice controls must be instituted to ensure that no worker is exposed to lead in excess of the PEL. Where such controls are not adequate to reduce exposures below the PEL, they are to be used to reduce exposures to the lowest level feasible and then supplemented with appropriate respiratory protection and corresponding personal protective equipment. The written compliance plan shall contain the following:

- Description of each activity that produces airborne lead. This shall include crew size, employee job responsibilities, maintenance practices, equipment used, and material involved.
- Description of engineering or administrative controls that will be taken to reduce lead exposure. If engineering controls cannot be achieved, the reason must be stated.
- Air monitoring data that documents the source of lead emissions.
- Detailed schedule for implementation of the plan.
- Schedule of employee rotation if administrative controls are used.
- Method used to notify other employees or subcontractors of potential exposure to lead (see 29 CFR 1926.16).
- Work practice program to include types of personal protective clothing, equipment, housekeeping, and hygiene practices.

21.4.5 Work Practices

The following lead control work practices must be followed to reduce exposures:

- Unbolt steel wherever practical to reduce the accumulation of dust.
- Wherever practical, use reciprocating saws, band saws, or shears to cut lead-containing surfaces.
- When torch cutting must be performed, local exhaust or portable forced air ventilation must be used whenever feasible.
- Torch-to-metal burning time must be limited to one hour per worker per eight-hour shift on lead-containing painted surfaces. Any change in work assignment exceeding the cutting time must have prior review by the contractor's safety representative to ensure the proper selection of respiratory protection.
- Rotation of workers to limit exposure time must be documented in writing in accordance with 29 CFR 1926.62 and this documentation must be kept on file.
- Prior to starting work, the contractor’s safety representative must approve changes in work assignments that exceed specified cutting times.

- The work area where exposure to lead is possible shall be barricaded, and warning signs placed frequently around the barricade to warn other employees.

21.4.6 Inspection

Inspections of the job site, equipment, and materials will be conducted at the beginning of work in each area and daily thereafter. The Site Safety Officer must perform job site inspections. Inspections performed by Safety and Health personnel must be documented and records kept on file.

21.4.7 Training

Training will be provided to all demolition and construction workers. All employees shall receive Hazard Communication training prior to working with lead or lead compounds. Each employee that may be exposed to lead will also receive additional training to include the following:

- Contents of this procedure;
- Nature of the work;
- The hazards of lead and its effect on employee health;
- Proper use of respiratory protection equipment;
- Medical surveillance program; and
- Contents of written compliance plan.

Proper documentation will be made each time this training is given and the records will be retained for the specified amount of time.

21.4.8 Personal Protective Equipment

Specialized personal protective equipment is not required for workers whose lead exposure does not exceed the PEL. Personal protective equipment such as coveralls, safety goggles, and hardhats must be used in accordance with safe work practices. In areas with less than 200 µg/m^3 of airborne lead, clothing will be provided weekly. In areas with greater than 200 micrograms of lead per cubic meter of air, clothing will be provided daily.

Workers whose lead exposure exceeds the PEL must be provided clean work clothing maintained in accordance with OSHA regulations 29 CFR 1926.62. Employees must not be permitted to leave the project site wearing lead-contaminated clothing. Clean change areas equipped with shower facilities and a water collection system will be provided adjacent to the work area. Bags containing contaminated clothing shall be labeled "*Caution: Contaminated with Lead."* Do not remove dust by blowing or shaking. Dispose of lead-contaminated wastewater in accordance with applicable local, state, or federal regulations.

Shower and hand washing facilities shall be required adjacent to work areas. Each employee exposed to lead shall be required to shower each time they leave the work area. A clean dressing area will be provided for changing clothes. An eating area free from lead

contamination, where soap and water are available, will be provided adjacent to the work area.

21.4.9 Medical Surveillance

Medical surveillance is to be made available to any employee who may be occupationally exposed to lead in concentrations that are at or above the action level. Blood lead and ZPP (zinc protoporphyrin) bioassays will be required. Each employee will be tested prior to beginning work and at least every two months for the first six months and every six months thereafter. Additional testing will be required if blood lead levels are found to be above 40 micrograms of lead per deciliter. (Reference: 29 CFR 1926.62(j)(iv)(2)(A-C)).

Complete medical examinations and consultations are not required unless the employee will be exposed to airborne lead for 30 days or longer, the blood sample results are above 40 micrograms of lead per deciliter, or the employee develops signs or symptoms of lead poisoning. (Reference: 29 CFR 1926.62(j)(3)(I)(A-C)). Employees must be notified of their biological monitoring results within five days of their receipt.

21.4.10 Respiratory Protection

Determination, selection, and use of respiratory protection must be in accordance with 29 CFR 1910.134. Subcontractors working on site premises whose workers may be exposed to lead shall have a written Respiratory Protection Program in accordance with 29 CFR 1926.62 and 29 CFR 1910.134. This program must be submitted to the MPS-DFMS EHS Shop Supervisor or Safety Specialist prior to start of work.

The level of respiratory protection required will be determined by exposure assessments based on representative air monitoring results, work conditions, and duration of exposure. Refer to 29 CFR 1926.62(d)(2)(ii) for specific tasks and anticipated exposure levels.

Respiratory protection is required if a worker's TWA exposure level is greater than the OSHA PEL of 50 µg/m^3 of airborne lead. All negative pressure respirators shall be equipped with high efficiency particulate (HEPA) filters. Quantitative or qualitative fit tests shall be performed at the time of initial fitting and every six months thereafter. Documentation of fit tests shall be provided to the MPS-DFMS EHS Shop Supervisor or Safety Specialist.

Powered, positive pressure air purifying respirators are to be provided to any employee that requests one. A Respiratory Protection Program must be in place prior to issuing respiratory protection.

21.4.11 Housekeeping

All surfaces will be maintained as free as practical from dust accumulations. Effective means of cleaning such as wet floor scrubbers and HEPA vacuums must be used. Compressed air cannot be used to remove lead from any surface unless it is part of a ventilation system

designed to prevent dispersal of lead dust. Contractors' supervision is responsible for ensuring that good housekeeping is maintained.

21.4.12 Signs

Work areas with anticipated lead exposures above the PEL must be posted with the following standard sign:

WARNING: LEAD WORK AREA
POISON
NO SMOKING OR EATING

21.4.13 Recordkeeping

Copies of records required for compliance with 29 CFR 1926.62 must be forwarded to DFMS Environmental Health and Safety (Shop 926). These records include, but are not limited to the following:

- Copies of subcontractor's air sampling results. Results that are over the PEL must also include a description of the corrective action to be taken to reduce exposure;
- Documentation of worker rotation in accordance with 29 CFR 1926.62, when rotation of workers is used to limit exposure time;
- Copies of daily inspection records;
- Copies of training records for affected workers;
- Copies of biological monitoring results and other medical records as required by 29 CFR 1926.62;
- Copies of results of blood levels for contractor's workers; and
- Copies of respirator fit test results for all MPS-DFMS and subcontractor personnel working on the particular project.

All employee exposure sampling and medical records shall be maintained for the duration of employment plus 30 years. MPS-DFMS will keep employees' records for medical removals for the duration of employment.

21.4.14 Checklist for Demolition Work – Cutting/Torching Painted Surfaces

☐ **Is the surface primed yellow, orange or rust red?** If yes, consider it to have significant lead content unless it has been tested and results show otherwise.

☐ **Use alternate method to cut if practicable:** Use band or reciprocating saw, or shearing devices.

☐ **Does a piece require torch cutting?** If yes, use paint removal, local exhaust or forced air ventilation where practicable.

☐ **Will torch-to-metal time be more than "incidental (exceeding five minutes for any individual for the shift)?** If yes, consider that an exposure above the Permissible

Exposure Limit will occur for employees assigned to torch cut, and assisting in the immediate area (within 25 feet). Implement provisions of the Exposure Control Plan (Note: These requirements do not apply to other personnel who may move into the cutting area when the torch is not being used). The following summarizes requirements for affected personnel:

- Train in potential hazards of lead and elements of the Exposure Control Plan.
- Implement Medical Surveillance.
- If respiratory protection is required, use properly fitting half-mask respirators equipped with HEPA filters.
- Protective equipment is required (gloves, disposable coveralls, hard hat, spats).

  (NOTE: disposable coveralls will be used for these tasks only. Dispose in a labeled waste drum.) Reused protective equipment must be stored separately from clean clothing, food, cigarettes, etc.

- Wash hands prior to eating, drinking, smoking, or applying cosmetics. It is recommended that affected employees shower at the end of the work shift.
- Protective equipment must not be worn beyond the immediate work area or into employee break areas.
- Post warning signs at entrance(s) to torch cutting area(s). No smoking, eating, or drinking is allowed in affected areas. Note that smoking is not allowed on any MPS property regardless of the activity.

21.4.15 General Lead Exposure Control Program

A. **Define Work Activity:** Develop a "Lead Exposure Control Program" by collecting the following information regarding the intended activity:

1. *Activities:* List the activities that will generate airborne lead (be specific).
2. *Equipment used:* List the equipment necessary to remove the lead coatings and that will be used to control lead exposures.
3. *Materials involved:* For example, abrasive blasting of lead-based paint, manual scraping, manual sanding, and use of heat gun. Power tool cleaning, load burning, using lead-containing mortar or spray painting with lead containing paints. Abrasive blasting, rivet blasting, welding, cutting, or burning on any structure where lead-containing coatings or paints are present. Transportation, disposal, storage, or containment of lead or materials containing lead on the site. This may occur at location which construction activities are performed.
4. *Controls in place:* Containment, mechanical ventilation, local exhaust ventilation, HEPA vacuums, negative air machines with HEPA filters, PPE, and airline respirators. Hygiene facilities, showers, and wash stations will be provided on an as-needed basis.

5. *Crew sizes:* Identify crew size by task if possible, and be specific. For example, a crew may consist of four painters, two laborers, one pipe fitter, and one operator.
6. *Employees' job responsibilities:* Use general work procedures, project agreements, construction work release and/or safe work plans to specify individual responsibilities.
7. *Operating Procedures:* Use the detailed work description as specified in the general work procedure for project agreements, construction work releases, job hazard analysis and the project Health and Safety plans.

B. **Develop Plan to achieve compliance and implement engineering controls:** Where engineering controls are required, engineering plans and studies should be used to determine feasible methods selected for controlling exposure to lead. Those methods will need to be documented.

C. **Evaluate Technology considered to meet the Permissible Exposure Level (PEL):** This would be the engineering controls selected to control airborne lead concentration in the work place.

D. **Review available air monitoring data that documents the source of lead emission:** This refers to the availability of any historic air sampling data used to determine or anticipate future worker exposures.

E. **Provide detailed schedule for implementation of the program:** This would include a timetable, which identifies the events or tasks, which may result in a lead exposure and the schedule milestones showing where controls will be implemented. Also, include purchase orders on long lead-time items that may impact the schedule.

F. **Evaluate work practice program including procedures/regulations:** Protective clothing and equipment, housekeeping, hygiene facilities, construction work release, job hazard analysis, and task Health and Safety plans, and other relevant work practices such as those listed in this procedure or 29 CFR 1926.62 shall be used.

G. **Develop administrative controls schedule for job rotation:** If administrative controls are used as a means of reducing employee's exposure to lead, establish and implement a job rotation schedule to include: The names, ID numbers, duration and exposure levels at each job or workstation, and information used to assess the effectiveness of the administrative controls.

H. **Establish communication channels between other contractors:** A description of arrangements made among multi-contractor sites with respect to informing affected employees of potential exposure to lead and with respect to responsibility for subcontractor(s) compliance with this program.

21.5 MPS-DFMS LEAD-BASED PAINT RENOVATION PROGRAM

The Milwaukee Public School system is committed to providing a safe and healthy work environment for all employees and building occupants. This commitment requires that adequate precautions be taken and special work practices be used to prevent employee and occupant exposure to lead risks resulting from deteriorating lead-based paint. To affect this policy, the Program drafted in these pages has been implemented.

21.5.1 Operations, Maintenance, and Repair Policies for Lead-based Paint

A. Purpose: The general purpose of the Lead-based Paint Renovation Program for Milwaukee Public School facilities is to maintain paint that contains lead in a manner that will protect the building occupants from exposure to lead-containing dust to abide by all applicable Federal, State, and local regulations with respect to lead-based paint.

B. Application: A Lead-based Paint Renovation Program shall be implemented when lead-based paint or coatings that are presumed to contain lead are present in any MPS facility. For the purposes of this document, all references to lead-based paint (LBP) shall include coatings presumed to contain lead and be treated accordingly.

C. Objectives: The MPS Lead-based Paint Renovation Program is designed with the following two primary objectives:

1. *Maintain all identified lead-based paint in its facilities in a condition that eliminates or reduces the risk of exposure to lead dust.* This may involve one or more of the following control measures: cleaning, repair, and removal. The primary goal of this element of the O&M program is to maintain lead-based paint in an intact, undamaged condition and eliminate debris resulting from deteriorating lead-based paint. Although more stringent policies and procedures shall be applicable when dealing with lead-based paint within “child-occupied spaces” all areas within MPS facilities shall conform to the policies and procedures set forth in this section.
2. *Monitor the condition of lead-based paint in MPS facilities.* MPS shall conduct yearly surveillances in order to recognize any deterioration of LBP in its facilities. These surveillances shall be conducted by the facility’s building engineer. Every 3 years, as a part of its AHERA 3-year reinspection program, MPS shall conduct an assessment of painted surfaces within its pre-1978 buildings using an inspector trained and certified by the Wisconsin Department of Health Services (DHS) as a Lead Risk Assessor. Recognized deterioration of LBP shall be listed by the building engineer and/or Risk Assessor and forwarded to the MPS paint shop supervisor responsible for the building for the implementation of corrective action.

D. Applicability: All persons conducting activities within an MPS facility that will disturb lead-based paint or disturb a painted surface that is assumed to contain lead shall reference the orange and black book “Identification of Lead-Based Paint in Child-Occupied Spaces”. Contact the building engineer to gain access to this book. This book shall be reviewed to identify whether the work activity is within a “child-occupied space”

as designated within the book. All persons shall evaluate their work activity to classify the planned project according to one of the following categories:

1. No special work practices are required if…
   - The work will be performed in a space that is not identified as a "child-occupied space".
2. The work practices detailed in SECTION 21.5.3 shall be followed if…
   - The work will be performed in a space that is identified as a "child-occupied space" and more than 6 square feet of lead-based paint is being disturbed in that area.
   - The work will be performed in a space that is identified as a "child-occupied space" and any amount of lead-based paint is being disturbed on any component of a window system.
3. The work practices detailed in SECTION 21.5.2 shall be followed if…
   - The work will be performed in a space that is not identified as a "child-occupied space."
   - The work will be performed in a space identified as a "child-occupied space" and the amount of lead-based paint being disturbed is below the thresholds indicated above under SECTION 21.5 D.2.
   - The work is an emergency renovation that results from a sudden, unexpected event that, if not immediately attended to, presents a significant safety or public health hazard, or threatens equipment or property with significant damage.

21.5.2 General Work Practices within all MPS Facilities

A. Identification of Lead-based Paint: Workers are to assume that all painted surfaces on MPS facilities constructed prior to 1978 contain lead.

B. Prohibitions: Workers are directed **not** to conduct work that would expose building occupants to dust and debris that contains lead.

C. Scheduling of Work Activities: Work activities that would disturb lead-based paint should be scheduled during times when children are not present in the vicinity of the work area.

D. Emergency Scheduling: If disturbance of paint is unavoidable when children are present due to emergency or unexpected event, minimize their exposure to dust and debris by using one or more of the following *additional* measures:

1. Secure entryways and post warning signs to isolate the work area from students and staff.
2. Delineate the perimeter of the work area using warning (barrier) tape when permanent barriers (walls & doors) do not isolate the work area. Barrier tape shall be three inches wide, be red or yellow in color, and shall have text printed along its length reading either "CAUTION" or "DANGER"

3. Work areas that are accessible to children must never be left unsupervised when dust and debris is present.

E. Work Practices: Work that disturbs lead-based paint must use sufficient cleaning methods to ensure that no residual dust or debris remains upon completion of the work. This is applicable to work that is conducted in both the interior and exterior of the facility. One or more of the following work practices can be used to control any dust and debris that may be generated from such work:

1. Use poly-drop cloths under the affected work area, sized and placed to contain any dust generated by the work activity.
2. Wet the painted area to be affected by the work activity with a water mist prior to disturbance.
3. HEPA vacuum, wet wipe, and/or mop all exposed horizontal surfaces within 8 feet of the work area.
4. If a large amount of dust and debris is anticipated, the work area can be isolated using poly-walls and poly drop cloths.
5. Use of non-HEPA shop vacuums is strictly forbidden on work activities that disturb lead-based paint.

21.5.3 Special Work Practices within a Child-Occupied Facility

A. Notification of Work Activities: For all work activities that disturb lead-based paint within a "child-occupied space" as identified in the orange and black "Identification of Lead-Based Paint in Child-Occupied Spaces" 3-ring binder, the building engineer & school principal (if applicable) shall be informed of scheduled maintenance and renovation activities that will disturb lead-based paint within a child-occupied space. Such notification shall be made by the MPS employee assigned to perform the work **at least 7 days BEFORE** the start of work. Notification shall be written using the following procedures:

1. MPS employee assigned to perform the work shall use MPS Form "LBP-100" to detail the scope of work disturbing lead-based paint within child-occupied spaces.
2. MPS employee assigned to perform the work shall then use partially completed MPS Form "LBP-100" to notify the building engineer of the scheduled work activities. The MPS employee assigned to perform the work shall obtain verification of disclosure of their work activity by obtaining name and signature of the building engineer on MPS Form LBP-100 and shall complete and sign same form. Form must be signed and dated at least one week before the start of the work.
3. MPS employee assigned to perform the work shall copy completed MPS Form LBP-100, maintaining the original for his or her own records and inserting a copy into the left inside pocket of the orange and black "Identification of Lead-Based Paint in Child-Occupied Spaces" book.

4. MPS employee assigned to perform the work shall on a daily basis ensure that the completed MPS Form LBP-100 remains within the 3-ring binder throughout the duration of the project. Use the original form to replace any lost postings.
5. Upon completion of the project, MPS employee assigned to perform the work shall remove and discard the copy inserted into the orange and black 3-ring binder, retaining the original for MPS records retention.
6. *EXEMPTION:* An emergency work activity that results from a sudden, unexpected event that, if not immediately attended to, presents a safety or public health hazard, or threatens equipment or property with significant damage is exempt from this notification requirement.

B. Notification Requirements & Contracted Workers: All Contractors shall be notified of the location of the Child-Occupied Space Identification Booklet and possible lead-based paint hazards in the job specifications, purchase order, or service order agreement. The prime Contractor receiving the contract shall be responsible for distributing information as required by law to all subcontractors and short-term workers under their control. As a part of this disclosure program, a sign prominently posted in the engineer's office shall read:

> **ATTENTION!!! NOTICE TO ALL CONTRACTORS THAT CONDUCT WORK IN THIS FACILITY: LEAD-BASED PAINT IS PRESENT WITHIN THIS FACILITY!!!**
>
> Before conducting work within this facility, the orange & black "Identification of Lead-Based Paint in Child-Occupied Spaces" book must be reviewed to ensure that any activities that disturb paint are performed according to DHS 163. Contact the building engineer to gain access to this book. Section 1 describes how to use the book to determine the location of spaces that are subject to DHS 163 and thus require special procedures. If needed, contact the building engineer for assistance. The disturbance of lead-based paint within a space constructed prior to 1978 is strictly prohibited without prior permission by the MPS project manager assigned to oversee the work. If no MPS project manager is assigned, contact MPS Environmental Health & Safety at 414-283-4626.

1. Contractors conducting work within an MPS facility subject to this section shall use an equivalent to Form "LBP-100" that details the scope of work that will disturb lead-based paint within one or more child-occupied spaces.
2. The Contractor shall obtain written verification of disclosure of their work activity as per HFS-163 using an equivalent of MPS Form LBP-100. Documentation must be signed and dated at least one week before the start of the work. The MPS Project Manager shall sign the Contractor's form as the MPS representative instead of the building engineer.

3. Contractors conducting work within MPS facilities subject to this section shall post work activity disclosure forms using the same public notification system used by MPS facility and maintenance staff.
4. Upon completion of the project, Contractor shall remove the public notification of the work activity, retaining the original for later submission to MPS as a part of closeout documentation.

C. Work Practices: The following work practices shall be used by MPS workers when conducting a work activity applicable to this section.

1. *Who may conduct:* Only the following persons may conduct renovation activities involving child-occupied facilities:
   - MPS workers that are also certified lead-safe renovators.
   - MPS workers trained by and under the supervision of an MPS worker that is certified as a lead-safe renovator.
   - MPS workers that are certified as lead abatement supervisors or lead abatement workers.
2. *Lead-safe work protocol:* When supervising or performing renovation activities, documented methodologies shall be used to conduct work in a lead-safe manner that does not create lead-based paint hazards, including work practices and engineering controls that limit the creation of dust and prevent the spread of dust, debris and paint chips outside the work area, and shall comply with all requirements under this section.
3. *Requirement for supervision:* The assigned certified lead-safe renovator, or another person who meets the conditions listed above, shall provide direct on-site supervision at all times during worksite setup, including while posting warning signs and establishing work area containments, and shall be onsite regularly during renovation activities to direct work performed by other individuals and to ensure that lead-safe work practices are being followed, that containment barriers are maintained and that dust and debris do not spread beyond the work area. The certified lead-safe renovator shall be readily available, either on site or by telephone, at all times while paint disturbing activities are being conducted and, when off site, shall be able to return to the worksite within a reasonable time, about 30 minutes, as needed.
4. *Requirement for ensuring compliance:* The MPS certified lead-safe renovator assigned to the project shall ensure that all renovation activities are conducted according to the requirements of this section and all applicable federal, state and local government requirements are followed.
5. *Occupant protection:* Documented methodologies and the following work practice requirements shall be used to protect occupants when renovation activities are performed:

- 'Post signs.' Signs clearly defining the work area and warning occupants and other persons not involved in the renovation activities to remain outside the work area. To the extent practicable, these signs shall be in the primary language of the occupants and read "Lead Paint Dust Hazard: Do Not Enter" and be no smaller than 11"x17". Signs shall be posted before beginning the work and shall remain in place and readable until the renovation activities and post-work cleaning verification has been completed.
- 'Contain work areas.' Before starting renovation activities, the work area shall be isolated so that no dust or debris leaves the work area during the activity. Workers shall maintain the integrity of the containment throughout the renovation activities by ensuring that any plastic or other appropriate containment materials are not torn or displaced and taking steps necessary to ensure that no dust or debris leaves the containment work area during the renovation. When the building is occupied, containment shall be installed in a manner that provides safe access to restrooms and exits for occupants. Containment may not be constructed in a manner that would interfere with worker egress in an emergency.

6. *Interior lead-safe work practices*: The MPS certified lead-safe renovator assigned to the project shall ensure that documented methodologies are used for all interior renovation activities and that all personal property in the work area is protected from contamination by dust and debris, including all of the following:
   - Remove all objects from the work area, including furniture, rugs, and window coverings.
   - Objects that cannot be removed shall be covered with plastic sheeting or other impermeable material with all seams and edges taped or otherwise sealed.
   - Close and seal all duct openings in the work area with taped down plastic sheeting or other impermeable material.
   - Close windows and doors in the work area. Doors shall be covered with plastic sheeting or other impermeable material. Doorways used as the entrance to the work area shall be covered with plastic sheeting or other impermeable material in a manner that allows workers to pass through while confining dust and debris to the work area.
   - Cover floor surfaces in the work area, including installed carpet, with taped down plastic sheeting or other impermeable material at least six feet beyond the perimeter of surfaces undergoing renovation, or a sufficient distance to contain all dust, whichever is greater.
   - Use precautions to ensure that all personnel, tools, and other items, including the exteriors of containers of waste, are free of dust and debris before leaving the work area.

7. *Exterior lead-safe work practices:* The MPS certified lead-safe renovator assigned to the project shall ensure that documented methodologies are used for all exterior renovation activities and that all personal property in the work area is protected from contamination by dust and debris, including all of the following:
    - Remove all objects from the work area, including furniture and play equipment. Object that cannot be removed shall be covered with plastic sheeting or other impermeable material with all seams and edges taped or otherwise sealed.
    - Close all doors and windows within twenty feet of the renovation work area. On multistory buildings, close all doors and windows within twenty feet of the renovation work on the same floor as the renovation and all doors and windows on all floors below that are the same horizontal distance from the renovation work.
    - Ensure that doors within the work area that will be used while the job is being performed are covered with plastic sheeting or other impermeable material in a manner that allows workers to pass through while confining dust and debris to the work area.
    - Cover the ground with plastic sheeting, other impermeable disposable material, or landscape fabric capable of collecting dust and debris extending ten feet beyond the perimeter of surfaces undergoing paint disturbance or a sufficient distance to collect falling paint debris, whichever is greater, unless the property line or neighboring structures prevent ten feet of ground cover.
    - As a situation requires, the MPS certified lead-safe renovator assigned to the project shall take extra precautions to contain the work area to ensure that dust and debris from renovation activities do not contaminate other buildings or areas of the property or migrate to adjacent properties.
8. *Prohibited practices:* The following work practices shall be prohibited or restricted during a renovation activity:
    - Open-flame burning, torching or charring of paint is prohibited.
    - Operating a heat gun on paint at or above 1100 degrees Fahrenheit is prohibited.
    - Using a chemical paint stripper containing methylene chloride is prohibited.
    - Using machines to remove paint through high-speed operation such as abrasive blasting, sandblasting, needle gunning, or machine sanding, grinding or planing painted surfaces, is prohibited unless the machine is operated with a properly fitted HEPA-filtered exhaust control in a fully contained work area.
    - High-pressure water blasting or hydroblasting is prohibited unless it is conducted in a fully contained work area with HEPA-filtered exhaust control and water collection system.
    - Using an improperly operating HEPA vacuum to clean up worksite dust, debris and paint chips is prohibited.
    - Dry sweeping dust, debris or paint chips in a renovation work area is prohibited.

9. *Waste handling:* Wastewater, air emissions and solid waste from renovation activities shall be handled as follows:
    - Contained in the work area to prevent the release of dust and debris before removal for storage and disposal. If a chute is used to remove waste from the work area it must be covered.
    - Stored in a container or enclosure at the conclusion of each work day that prevents access to and release of dust and debris.
    - Contained to prevent release of dust and debris for final transport at the conclusion of renovation activities.
    - Discharge of wastewater shall be managed according to chapters NR 105, 106 and 200 to 299.
    - Air emissions shall be managed according to chapters NR 404, 415, 429 and 445.
    - Paint debris and waste shall be managed according to chapters NR 500 to 538 and 660 to 679.
10. *Cleaning the work area:* The following methodologies shall be used to clean all work areas at the end of each work day and when all renovation activities have been completed. After the paint disturbing work has been completed, the work area shall be cleaned until no dust, debris or residue remains.
    - For all interior and exterior work areas:
        - All paint chips and debris shall be collected and, without dispersing any of it, sealed inside heavy-duty impermeable waste bags.
        - All poly sheeting shall be disposed as waste by first misting, then folding inward until it has been reduced in size to enable placing it in heavy-duty waste bags. Sheeting used to isolate contaminated areas from non-contaminated areas must remain in place until after final cleaning and removal of all other sheeting.
    - For exterior work areas, all visible debris, paint chips and residue in and below the work area shall be removed, including material that has dropped to the ground, fallen on window sills and has otherwise accumulated on other horizontal surfaces. The following methods shall be used:
        - All walls adjacent to the work area noted with debris shall be cleaned using HEPA vacuums.
        - All areas with visible debris that was not controlled or collected using impermeable drop cloths shall be cleaned using HEPA vacuums.
    - For interior work areas:
        - All objects and horizontal surfaces in the work area including surfaces out to two feet beyond the work area shall be cleaned starting at the top and working down to the floor.

- All walls within the work area shall be cleaned starting at the ceiling and working down to the floor by either HEPA vacuuming or wiping with damp disposable cleaning cloths.
- All other interior surfaces and objects in the work area shall be thoroughly cleaned using a HEPA vacuum, including horizontal surfaces, furniture and fixtures.
- After vacuuming, all surfaces, objects and fixtures within the work area shall be wiped with damp disposable cleaning cloths.
- For carpets that are within the work area, a HEPA vacuum shall be used with a beater bar to thoroughly and meticulously vacuum carpets and rugs.
- For uncarpeted floors within the work area, cleaning shall be done using a 2- or 3-bucket mopping system or thoroughly cleaned using disposable cloths.

11. *Post-activity visual inspection:* A visual inspection of the work area or areas shall be conducted by the MPS certified lead-safe renovator assigned to the project after renovation activities and cleaning have been completed.
    - For interior renovation activities, a visual inspection shall be performed to determine whether dust, debris or residue is still present in or around the work areas. If dust, debris or residue is present, these conditions shall be removed by re-cleaning and another visual inspection shall be performed.
    - For exterior renovation activities, a visual inspection shall be performed to determine whether dust, debris or residue is still present on surfaces in and below the work area, including windowsills and the ground. If dust, debris or residue is present, these conditions shall be eliminated and another visual inspection shall be performed. After the work area or areas pass visual inspection, the activity is considered complete and warning signs may be removed.
12. *Post renovation cleaning verification for interior work areas:* Unless dust wipe sampling is being conducted by EHS (shop 926), after a successful visual inspection, the MPS certified lead-safe renovator assigned to the project shall verify cleaning of all interior work areas by using the following procedures:
    - Verify that each window sill in the work area has been adequately cleaned by wiping the windowsill with an unused wet disposable cleaning cloth that is damp to the touch and comparing the cleaning cloth to the cleaning verification card.
        - If the cleaning cloth matches or is lighter than the cleaning verification card, the window sill has been adequately cleaned.
        - If the cleaning cloth is darker than the cleaning verification card, the window sill has not been adequately cleaned and re-cleaning following the procedures in 3(j) is required. After re-cleaning, either use a new cleaning cloth or fold the used cloth in such a way that an unused surface is exposed

and wipe the surface again. If the cleaning cloth matches or is lighter than the cleaning verification card, the windowsill has been adequately cleaned.
    - If the cleaning cloth is still darker than the cleaning verification card, wait one hour or until the surface has dried completely, whichever is longer.
    - After waiting for the window sill to dry, wipe the sill with a dry disposable cleaning cloth. After this wipe, the window sill has been adequately cleaned.
- Verify that uncarpeted floors and countertops within the work area have been adequately cleaned by wiping the floors and countertops with an unused wet disposable cleaning cloth. Floors shall be wiped using a long-handled mop designed with a head attachment for wet disposable cleaning cloths. The cleaning cloth must remain damp at all times while it is being used to wipe the surface for post-activity cleaning verification. If the surface within the work area is larger than 40 square feet, the surface within the work area must be divided into roughly equal sections that are each less than 40 square feet. Wipe each section separately with a new wet disposable cleaning cloth.
    - If the cloth used to wipe that section within the work area matches the cleaning verification card, that section has been adequately cleaned.
    - If the cleaning cloth used to wipe a particular section is darker than the cleaning verification card, that section has not been adequately cleaned and re-cleaning following the procedures in 3(j) is required. After re-cleaning, use a new cleaning cloth and wipe that section again. If the cleaning cloth matches or is lighter than the cleaning verification card, that section of the surface has been adequately cleaned.
    - If the cleaning cloth used to wipe a particular surface section is still darker than the cleaning verification card after the surface has been re-cleaned, wait for one hour or until the entire section surface has dried completely, whichever is longer. After waiting for the entire section surface to dry, wipe the surface with a dry disposable cleaning cloth. After this wipe, that section of the surface has been adequately cleaned.
- When the work area passes the post-renovation cleaning verification, warning signs may be removed.

13. *Optional dust clearance testing:* Cleaning verification will not be performed if the MPS Environmental Shop conducts dust wipe clearance sampling in the work area at the conclusion of a renovation activity covered by this chapter. When such sampling is conducted, the following procedures shall be used.
    - Dust clearance samples for renovation activities shall be collected by a certified lead inspector or lead risk assessor following clearance protocol as detailed under s. DHS 163.14 (5) (c).
    - The MPS certified lead-safe renovator assigned to the project shall be redirected to re-clean or seal work areas and component types that fail dust clearance until

the dust clearance sample results are below the clearance standards in s. DHS 163.14 (5) (c) 8.

14. *Activities conducted after successful cleaning verification or clearance testing:* Activities that do not disturb paint, such as re-painting walls that have been properly prepared, are not regulated under this subchapter if they are conducted after cleaning verification has been performed or clearance testing results show dust lead levels below the clearances standards in s. DHS 163.14 (5) (c) 8.
15. *Emergency renovations:*
    - An "emergency renovation" is a work activity that results from a sudden, unexpected event that, if not immediately attended to, presents a safety or public health hazard, or threatens equipment or property with significant damage.
    - Emergency renovations are exempt from the notification requirements as detailed in item 1 of this section. The work practices detailed in SECTION 21.5.2 shall be followed when performing emergency renovations.
16. *Recordkeeping:* All collected records subject to SECTION 21.5.3 and as required under DHS 163 shall be maintained for a minimum of 3 years following the completion of the renovation project. Such records shall include:
    - The MPS certified lead-safe renovator assigned to the project shall prepare, maintain and forward the following records to the MPS Environmental Shop within 10 days of the project's completion.
        - Completed original Form LBP-100 used to notify building administrators of the work activities and acknowledge receipt of information.
        - Completed original Form LBP-200 used by the MPS certified lead-safe renovator to verify procedures used to conduct work pursuant to DHS 163 and SECTION 21.5.3 of this document.
    - For each renovation project subject to SECTION 21.5.3, the following documentation shall be maintained by MPS Environmental Shop in addition to records forwarded by the MPS certified lead-safe renovator assigned to the project:
        - Any dust clearance testing results used in lieu of the wipe testing method detailed in 3 (l) of this section.
        - Any lead inspection report certifying that paint on one or more surfaces that is affected by the renovation activity is not lead-based paint.

ATTENTION!!!

NOTICE TO ALL WORKERS THAT CONDUCT WORK IN THIS FACILITY:

LEAD-BASED PAINT IS PRESENT WITHIN THIS FACILITY!!!

Before conducting work within this facility, the orange & black "Identification of Lead-Based Paint in Child-Occupied Spaces" book must be reviewed to ensure that any activities that disturb paint are performed according to DHS 163. Contact the building engineer to gain access to this book. Section 1 describes how to use the book to determine the location of spaces that are subject to DHS 163 and thus require special procedures. If needed, contact the building engineer for assistance. The disturbance of lead-based paint within a space constructed prior to 1978 is strictly prohibited without prior permission by the MPS project manager assigned to oversee the work. If no MPS project manager is assigned, contact MPS Environmental Health & Safety at 414-283-4626.

DO NOT REMOVE OR COVER!!!!!!!

LBP-100 Disclosure Of Renovation Impacting Lead-Based Paint

The following is a summary of renovation activities as required under DHS 163.13 that may or will disturb surfaces containing lead-based paint within one or more child-occupied spaces.

Site Name: _____

MPS Shop Name: _____ **Work Order #:** _____

Start Date: _____ **Anticipated Completion Date:** _____

Scope of Work Involving the Disturbance of Lead-Based Paint

Location	Work Description

Use the floor plans in the Child-Occupied Space Identification Book to properly locate areas

ACKNOWLEDGMENT FOR RECEIPT OF RENOVATION DISCLOSURE & EPA PAMPHLET

In accordance with 40 CFR 745.84, a Renovation Disclosure Statement detailing work activities that may or will disturb lead-based painted surfaces at the facility referenced above has been issued to a representative of Milwaukee Public Schools. A copy of the EPA pamphlet *"Renovate Right: Important Lead Hazard Information for Families, Child Care Providers and Schools"* has also been issued to the school and is reviewable upon request.

MPS Worker's Verification of Issuance			Building Engineer's Verification of Receipt	
Name:			**Name:**	
Date:			**Date:**	
Signature:			**Signature:**	

A copy of this statement MUST be inserted and maintained in the left pocket of the orange & black "Identification of Lead-Based Paint in Child-Occupied Spaces" book for the entire duration of this renovation project.

LBP-100C Disclosure Of Renovation Impacting Lead-Based Paint

The following is a summary of renovation activities as required under DHS 163.13 that may or will disturb surfaces containing lead-based paint within one or more child-occupied spaces.

Site Name: _____

Contractor Name: _____ **Work Order #:** _____

Start Date: _____ **Anticipated Completion Date:** _____

Scope of Work Involving the Disturbance of Lead-Based Paint

Location	Work Description

Use the floor plans in the Child-Occupied Space Identification Book to properly locate areas

ACKNOWLEDGMENT FOR RECEIPT OF RENOVATION DISCLOSURE & EPA PAMPHLET

In accordance with DHS 163, a Renovation Disclosure Statement detailing work activities that may or will disturb lead-based painted surfaces at the facility referenced above has been issued to a representative of Milwaukee Public Schools. A copy of the EPA pamphlet *"Renovate Right: Important Lead Hazard Information for Families, Child Care Providers and Schools"* has also been issued to the school and is reviewable upon request. This statement shall be posted in a common area where it can be viewed by building occupants and parents or guardians of children frequenting the building while the renovation is ongoing.

Contractor's Verification of Issuance			Building Engineer's Verification of Receipt	
Name:			**Name:**	
Date:			**Date:**	
Signature:			**Signature:**	

A copy of this completed and signed Statement must be forwarded to the MPS-DFMS Project Manager **BEFORE** the start of work.

LBP-200 RENOVATION CHECKLIST FOR PROJECTS IMPACTING LEAD-BASED PAINT

The following is a summary of renovation work activities that will be disturbing lead-based painted surfaces within spaces identified as "child-occupied spaces" in the facility listed below.

Site Name: _____

MPS Shop: _____ **Work Order #:** _____

Start Date: _____ **Completion Date:** _____

MPS Lead-Safe Renovator: _____ **State Cert #:** _____

WORK SETUP:

☐ Form LBP-100 has been completed detailing the Scope of Work for this project and a copy has been inserted into the 3-ring binder "Identification of Lead-based Paint in Child-Occupied Spaces".

☐ A copy of the EPA pamphlet "Renovate Right" is available in the main office for public review throughout the duration of the project.

☐ A copy of the training certificate for the MPS lead-safe renovator assigned to the project (as referenced above) is appended and present on site throughout the duration of the project.

☐ A copy of the Certificate of Approval for MPS as a lead-safe company is appended and present on site throughout the duration of the project.

☐ All workers involved in the project referenced above have been instructed in the "checked" topics:

- ☐ *Posting of warning signs around containment*
- ☐ *Maintaining containment throughout project*
- ☐ *Waste handling of all debris*
- ☐ *Setting up plastic containment barriers*
- ☐ *Avoiding spread of dust to adjacent areas*
- ☐ *Post-renovation cleaning*

☐ All workers performing work as a part of this project are listed on the backside of this form.

WORK PROCEDURES:

☐ The entrances to all work areas have been properly posted with appropriate warning signs.

☐ All work areas have been properly contained to prevent the spread of dust and debris as follows:

- ☐ *All objects in the work area have been removed or covered [interior spaces]*
- ☐ *HVAC ducts in all work area are closed and covered [interior spaces]*
- ☐ *All windows in the work area have been closed [interior spaces]*
- ☐ *All windows in and within 20 feet of the work area have been closed [exterior]*
- ☐ *All doors in the work area have been closed and sealed [interior spaces]*
- ☐ *All doors in and within 20 feet of the work area have been closed and sealed [exterior]*
- ☐ *Z-flap doors have been installed at doors used for entry into the work area [interior spaces]*
- ☐ *Floors within the work area have been covered with taped-down poly-sheeting [interior spaces]*
- ☐ *Ground in and within 10 feet of the work area has been covered with poly-sheeting that has been secured or anchored in place [exterior].*
- ☐ *If necessary, vertical containment installed to prevent migration of dust and debris to adjacent properties [exterior].*

☐ All waste has been containerized on-site and disposed of within sealed containers.

☐ Work areas have been properly cleaned after completion of renovation activities as follows:

- ☐ *All protective sheeting used to collect dust and debris has been misted, folded inward, and then sealed within waste containers.*
- ☐ *All visible chips and debris have been collected and then sealed within waste containers.*
- ☐ *All surfaces and objects within the work area have been cleaned using HEPA vacuum and/or wet clothes or mops [interior]*

☐ Post renovation cleaning verification was performed by the MPS lead-safe renovator listed above. Wipe & comparison testing using a valid EPA Post Renovation Cleaning Verification Card indicated areas were properly cleaned. The testing required ____ series of samples to be collected. The testing used a total of ____ wet cloth(s) for evaluation.

☐ OPTIONAL: In lieu of wipe and comparison testing, shop 926 performed dust wipe clearance testing (results to be appended later).

☐ As the certified lead-safe renovator assigned to this project, I certify under penalty of law that the above information is true and complete

Signature of Lead-Safe Renovator: _____ **Date:** _____

WORKER'S PRINTED NAME	WORKER'S PRINTED NAME	WORKER'S PRINTED NAME
1.	2.	3.
4.	5.	6.
7.	8.	9.
10.	11.	12.
13.	14.	15.
16.	17.	18.
19.	20.	21.

☐ Form LBP-100 has been removed from the 3-ring binder "Identification of Lead-based Paint in Child-Occupied Spaces" upon completion of the renovation activities.

LBP-300: LEAD SWAB TEST REPORT FOR PAINTED SURFACES

The following is a report of as required under DHS 163.13(3)(c)10 and DHS 163.14(11)(p) to refute that a painted surface contains lead-based paint as defined under DHS 163 when performing a renovation activity that will disturb a painted surface.

Site #: ______ **Site Name:** ____________________

MPS Shop #: ________ **Testing done to facilitate Work Order #:** ____________

Sampler's Name: ____________________ **Lead Cert #:** ____________

Test Kit Manufacturer: 3M **Model #:** PB-2M8I **Lot #:** ____________

PAINTED SURFACES TO BE DISTURBED BY RENOVATION ACTIVITY

Room Number	Component & Paint/Coating Description	Result
		☐ Positive ☐ Negative*
* ☐ swab (w/ a negative result) was tested on the lead test card & met the positive response criteria		
		☐ Positive ☐ Negative*
* ☐ swab (w/ a negative result) was tested on the lead test card & met the positive response criteria		
		☐ Positive ☐ Negative*
* ☐ swab (w/ a negative result) was tested on the lead test card & met the positive response criteria		
		☐ Positive ☐ Negative*
* ☐ swab (w/ a negative result) was tested on the lead test card & met the positive response criteria		
		☐ Positive ☐ Negative*
* ☐ swab (w/ a negative result) was tested on the lead test card & met the positive response criteria		
		☐ Positive ☐ Negative*
* ☐ swab (w/ a negative result) was tested on the lead test card & met the positive response criteria		
		☐ Positive ☐ Negative*
* ☐ swab (w/ a negative result) was tested on the lead test card & met the positive response criteria		
		☐ Positive ☐ Negative*
* ☐ swab (w/ a negative result) was tested on the lead test card & met the positive response criteria		

Use the floor plans in the "Identification of Lead-Based Paint in Child-Occupied Spaces" book to locate areas

SAMPLER'S (SIGNATURE) STATEMENT:

I ____________________________ attest that I have used the lead swab test kit in accordance with the kit's instructions and that all painted surfaces that will be impacted by the referenced renovation project have been addressed.

This statement MUST be kept with all other project documentation project as per DHS 163.14(11)(q) for a period not less than 3 years after the date of the project's completion.