



UNIVERSITY OF THE COMMONWEALTH OF VIRGINIA  
OLD DOMINION UNIVERSITY

**OFFICE OF ENVIRONMENTAL HEALTH AND SAFETY**  
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*Occupational Safety & Health ♦ Environmental Health ♦ Laboratory Safety ♦ Industrial Hygiene ♦ Radiation Safety ♦ Hazardous Waste ♦ Pollution Prevention*

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# OLD DOMINION UNIVERSITY LEAD MANAGEMENT PLAN

Administered by  
ENVIRONMENTAL HEALTH AND SAFETY OFFICE

Revision Date: August 2019





B. Department

3. Complete an At Work or Work Related Accident/Injury Report and submit to Human Resources for any lead related medical issues;
4. When involved with any exposure to lead workers shall wash their hands, arms and faces prior to eating, drinking, applying cosmetics or smoking.

## Hazard Assessment

Prior to maintenance, renovation or demolition activities of painted building surfaces at ODU, an assessment shall be made of the materials to determine lead content of the affected surfaces. **For any operation or task where the potential to disturb lead exists, ODU is required to conduct an initial employee exposure assessment to determine whether employees may be exposed to lead at or above the action level of 30 ug/m<sup>3</sup>.** If repair work, demolition or other activities can result in any exposure to lead the **EHSO should be notified for a determination.** Unless a task conducted with lead containing material is not anticipated to create dust or debris initial employee monitoring may be required. This initial determination will require the employee to be monitored utilizing a sample pump unless previously collected data demonstrates conclusively that no employee will be exposed to lead in excess of the action level. Where monitoring is required for the initial determination, it may be limited to a representative number of employees who are reasonably expected to have the highest exposure levels. The EHSO will assist and provide all sampling equipment necessary to conduct the assessment. All lead-related work tasks will be conducted in accordance with current OSHA Lead in Construction Standards

## Paint Assessment & Testing

Generally, buildings constructed after 1978 do not contain lead-based paint, but may have lead-containing paint. **For buildings constructed prior to 1978, lead-based paint assessments must be performed for any surface that will be disturbed and is suspected of containing lead-based paint.** If the paint is lead-containing, exposure monitoring, training and respiratory protection may be required. Determinations will be made after evaluation by the EHSO.

If a lead-based paint inventory exists for the surfaces involved in the work, Project Managers shall refer to the inventory for the location of lead-based paint. If an inventory does not exist, and the building was constructed prior to 1978, substrate testing will be required to ascertain the existence of lead-based paint.

## Exposure Monitoring

Exposure monitoring may be required for maintenance activities involving the disturbance of lead-based or lead-containing paint, unless the same type of job has been assessed previously. Initial monitoring may be limited to a representative sample of those employees exposed to the greatest concentrations of airborne lead. This result is then attributed to the other employees of the group. A review of any previous assessment can be used to decide if additional monitoring is necessary.

## Lead Awareness Training

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