LABOR RELATIONS

UNITED STATES POSTAL SERVICE

November 1, 2018

Mr. Brian J. Wagner
President
National Association of Postal Supervisors
1727 King Street, Suite 400
Alexandria, VA 22314-2753

Dear Brian:

As a matter of general interest, the Postal Service is revising Management Instruction (MI) EL-890-2007-4, *Lead Hazard Management Program.*

The purpose of this revision is to modify the MI to reflect current industry standard language, update responsibilities, and remove language related to lead in water that is included in other Postal Service policy documents.

We have enclosed two copies of the MI, one with and one without changes identified.

Please contact Bruce Nicholson at extension 7773 if you have any questions concerning this matter.

Sincerely,

Alan S. Moore
Manager
Labor Relations Policies and Programs

Enclosures

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Management Instruction

Lead Hazard Management Program

This management instruction (MI) establishes policy for the control of *lead-based paint (LBP) and lead-containing material (LCM)*~~lead-containing material, principally lead-based paint and lead in drinking water,~~ in Postal Service facilities or on Postal Service property.

Date	November~~July~~ 1, 2018~~2007~~
Effective	Immediately
Number	MI EL-~~8~~90-2018-~~890-2007-4~~
Obsoletes	MI EL-810-1999-1
Unit	Safety~~Environmental Policy~~ and OSHA Compliance Programs~~Programs~~

Simon Storey
Vice President
Employee Resource Management

Policy

To provide a safe and healthful work environment for its employees and building occupants, the Postal Service will:

1. Manage and maintain Postal Service property, buildings, and equipment so that LBP and LCM~~lead-containing material (LCM) and lead-based paint (LBP) (including paints, varnishes, lacquers, and other coatings)~~ do not become a hazard to employees and other building occupants or contaminate the environment. (See~~(See~~

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Attachment 3, Definitions.)

2. Assess the risk to employees and other building occupants from LCM and LBP and LCM and ensure that Postal approved work practices are followed.
3. Comply with all applicable safetyfederal regulations and state and local environmental lead standards and regulations.

Scope

This MI applies to the following:

1. Spaces owned and leased by the Postal Service.
2. Other building spaces occupied by Postal Service employees.
3. Postal Service employees and contractors working for the Postal Service who occupy the spaces described in 1 and 2.
4. Postal Service customers.
5. Tenants leasing space from the Postal Service.
6. 4. Vendors who provide products and services related to such spaces.

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Regulatory Requirements

Certain Occupational Safety and Health Administration (OSHA), Environmental Protection Agency (EPA), and state environmental leadlead standards and regulations apply to the Postal Service (see. See Attachment 1, Regulatory Requirements, for details). Consult Area Safetyarea Managers (ASMs) and your environmental field support specialist, Environmental Programs, regarding state lead regulations that may apply to the Postal Service.

Occupational Safety and Health Administration

General Industry Standard

OSHA's general industry standard (Title 29 Code of Federal Regulations (CFR) 1910.1025)(Title 29 Code of Federal Regulations (CFR) 1910.1025), applies to exposure to lead in all occupations, except construction and agriculture.

The concept of *Initial Determinationinitial exposure determination* is a key provision of this standard. The regulation states, "Each employer who has a workplace or work operation... covered by this standard shall determine if any employee may be exposed to Leadlead at or above the Action Level" (29 CFR 1910.1025(d)(2)).action level" (29 CFR 1910.1025(d)(2)).

OSHA defines the *Action Level (AL)action level* as employee exposure (without regard to the use of respirators) to an airborne concentration of lead of 30 micrograms per cubic meter of air (30 µg/m^3) averaged over an 8-hour period (29 CFR 1910.1025(b)). When the initial determination has found the possibility of employee exposure above the AL, an employer must conduct regular monitoring until the lead levels are once again below the AL.µg/m^3) calculated as an 8-hour, time-weighted average (29 CFR 1910.1025(b)).

A second key provision of this standard is the *Permissible Exposure Limit (PEL)*, which is the maximum exposure allowed before an employer must take corrective action such as engineering and work practice controls, employee blood monitoring, provision of respirators and frequent sampling. The PEL for lead is currently 50 µg/m3 over an 8-hour period.

Construction Industry Standard

OSHA's construction industry standard (29 CFR 1926.62)(29 CFR 1926.62) applies to "all Construction Workconstruction work where an employee may be occupationally exposed to Leadlead." The standard covers construction activities where LBP or LCM may be present, including:

- Demolishing structures.
- Scraping and sanding manually.
- Using heat guns.

- Chemical stripping.
- Cleaning power tools with dust collection systems.
- Blasting, welding, and cutting with abrasives.
- Burning with torches.

~~sanitation standard requires the provision of *potable water* in all places of employment for drinking, washing, and personal service rooms (29 CFR 1910.141(b)(1)). OSHA defines *Potable water* as water that meets the quality standards prescribed in federal, state, or~~

~~Sanitation Standard~~

~~OSHA's~~

Note: *Postal Service requirements fall under both the OSHA General Industry and Construction Industry standards, and should be followed accordingly.*

~~local regulations, including those for lead content (29 CFR 1910.141(a)(2)).~~

Environmental Protection Agency

Lead is a pollutant regulated by many laws administered by the EPA, including:

- Toxic Substances Control Act (TSCA).
- Residential Lead-Based Paint Hazard Reduction Act of 1992 (Title X).
- Clean Air Act (CAA).
- Clean Water Act (CWA).
- Safe Drinking Water Act (SDWA).
- Resource Conservation and Recovery Act (RCRA).
- Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA).

Contact your environmental field support specialist for guidance on disposal of LBP and LCM, which is regulated under RCRA and TSCA. LBP and LCM waste may be subject to strict management and disposal standards. Waste material from LBP and LCM~~Under EPA regulations, a solid waste is considered hazardous if it has a concentration of 5.0 milligrams or more of lead per liter when tested by the toxicity characteristic leaching procedure (40 CFR 261.24).~~

~~Resource Conservation and Recovery Act~~

~~Under the Resource Conservation and Recovery Act of 1976 (40 CFR 239–299), waste material from LBP and lead containing materials~~ abatement projects may have to be disposed of as hazardous waste. Examples of hazardous waste include:

- ~~•~~ Paint chemically stripped from components.
- ~~•~~ Spent media from vacuum- blasting operations.
- ~~•~~ Small painted components.
- ~~•~~ Cleanup debris (e.g., plastic barriers and protective clothing).
- ~~•~~ Contaminated soil.

~~Residential Lead-Based Paint Hazard Reduction Act~~

~~Under this Residential Lead-Based Paint Hazard Reduction Act of 1992 (Title X of Public Law 102-550), EPA sets standards for LBP hazards and regulates activities in target housing and child-occupied facilities (40 CFR 745). To conduct activities that involve LBP, regulated facilities must comply with the following.~~

- ~~Sellers and lessors must disclose potential lead hazards.~~
- ~~Workers must have certified training.~~
- ~~Management must establish work practice procedures.~~

The Safe Drinking Water Act

The Safe Drinking Water Act (40 CFR 141–149)~~(40 CFR 141–149)~~ sets standards for lead in drinking water and prohibits the use of lead components in potable water systems. *Lead in drinking water is not covered in this MI.* For information on lead in drinking water, see the following Postal documents:

- MMO-049-18, Water Sampling (Lead, Etc.) and Shelf-Life of Bottled Water.
- Environmental Compliance Bulletin – Drinking Water.
- Safety Resources Lead Page.
- MOP-ERM-01-07-2009- Memorandum of Policy on Water Filtration.
- Handbook RE-6 – Facilities Environmental Guide.

Managing Buildings and Equipment with

Lead-Based Paint and Lead-Containing Materials

The following apply to work in areas that may contain LBP or LCM:

1. Manage LBP and LCM in Postal Service buildings and ~~on Postal Service~~ property in such a manner that LBP or LCM~~it~~ does not become a hazard to employees or to other building occupants or contaminate the environment.
2. Take into account the presence and condition of LBP and other LCM ~~(such as soils)~~ when managing ~~property and~~ buildings and property. This includes management of new space acquisitions, out-leases, subleases, transfer of real property, renovation, alteration, construction, and demolition.
3. Maintain LBP and LCM~~paint~~ in place by keeping the area(s) in good condition (i.e., no flaking, delamination, or peeling), and applying a top coat, when necessary, to stabilize the paint. Painted~~. Although painted~~ surfaces in good condition are not considered a health hazard; however, lead becomes a potential hazard if paint (a) is allowed to deteriorate; (b) is dry~~-~~sanded, dry~~-~~scraped, or heated; or (c) otherwise becomes inhalable or ingestible~~. A best practice is to maintain paint in place in good condition~~, such as during demolition or renovation activities~~by top coating.~~
4. Inform Postal Service employees, contractors, and other building occupants of the presence of LBP and LCM, specifically when~~if~~ they ~~are going to~~ perform tasks that may impact identified materials~~create lead dust or fumes~~.

   Note: *~~-~~ Postal Service employees rarely perform tasks that expose them to airborne lead above ~~permissible exposure limits (~~PELs~~).~~ However, ~~reactive or other nonroutine~~ maintenance or construction-related activities may create lead dust or fumes. Managers can reduce~~prevent employee~~ exposure to lead and environmental releases by identifying areas where LBP and LCM are located in the facility, using Postal Service~~lead identification, approved~~ work practices, ~~work practices, and~~ engineering controls, and properly training employees.*

5. Ensure ~~. See the section on protecting~~ workers are appropriately certified, following ~~on page 5.~~

   EPA training guidelines for lead work.

6~~5~~. Never purchase materials~~coatings~~ formulated with lead, and never use~~apply~~ such materials in~~coatings to~~ Postal Service equipment or facilities.

7. Prior to leasing or purchasing a space or property, a review of

previous environmental testing reports for LBP and LCM is required. If the building owner provides a lead-free certification from the builder, no additional testing is necessary. However, if no sampling data is provided, or testing was not performed, an inspection is required to determine the presence of LBP or LCM.

Lead ~~Drinking Water~~

~~Since 1986, the use of lead or lead-containing fixtures, fittings, and solder in drinking water equipment and lines has been banned by the Safe Drinking Water Act. The following requirements apply:~~

~~1. Ensure that a new facility does not contain lead in its potable water systems.~~

~~2. Evaluate newly acquired space for the presence of lead in potable water systems, including water coolers, before the space is occupied.~~

3. Evaluate water systems, coolers, and other water outlets using current EPA guidelines, when indicated. (See Resources on page 22 for information about EPA resources.)

4. Provide bottled water, until the lead content is abated, when sampling indicates that water systems or point sources provide water with lead content in excess of 20 parts per billion.

For further information, consult EPA regulations; Postal Service Handbook RE-6, *Facilities Environmental Guide*; and the current Maintenance Management Order on water sampling (See Resources on page 22.)

Designated states, such as California, may use more stringent testing protocols to determine hazard thresholds. Consult state requirements where applicable.

Abatement and De-leading Operations

Lead abatement, as defined in 40 CFR 745.223,40 CFR 745.223, must be conducted by contractorspersons accredited under EPA and/or applicable state regulations in the following circumstances:

1. A risk assessment indicates that abatement of LBP is required.

1. 2. Construction or maintenance-related activities that make abatement or de-leading necessary.

2. A risk assessment (performed by an accredited risk assessor) indicates that abatement of lead is required.

Conduct lead abatement in accordance with 40 CFR 745.22740 CFR 745.227 and all other applicable federal and state environmental regulations.

Note: *This includes using certified firms when performing lead abatement, and clearance sampling by a certified lead risk assessor or inspector, when necessary. Consult District Safety for guidance.*

Lead abatementAbatement and de-leading operations may generate hazardous waste. Facilities and operations that generate hazardous waste are subject to stringent waste management requirements. See MI EL-890-2007-5, *Integrated Waste Management*, and consult your environmental field support specialist for additional information on proper management of hazardous waste. See MI

Worker and Occupant Protection

EL-890-2007-5, *Integrated Waste Management*, for additional information on proper management of hazardous waste. (See Resources on page 22).

Protecting Workers and Building Occupants From Lead-Based Paint or Other Lead Containing Materials

Assessing the Risk

Maintaining LBP and LCM in good condition is the best practice. However, LBP and LCM in Postal facilities (ownedspaces occupied or leased)proposed for occupancy may have deterioration that presentsdeteriorated so as to present a hazard to employees or other building occupants. If Management or Safety identifiesIf an installation head suspects (or is advised by safety or environmental professionals) that LBP may pose a lead hazard outside the scope of the Postal Service- approved work practices, an , then a person certified by EPA-accredited lead inspector or risk assessor must perform an inspection of the facility (40 CFR 745).conduct a risk assessment

The ~~(40 CFR 745).~~

EPA has not issued protocols for inspections and risk assessments in public and commercial buildings as of the date of this management instruction. However, plans to, but may issue protocols for work practices and training in public and commercial buildings may occur in the future (40 CFR 745.228–230). under 40 CFR

In the interim745.228–230.

Until EPA issues protocols, Postal Service inspections and risk assessmentsassessment for lead must focus on the potential for:

1. 1. Inhalation exposure experienced by employees and other building occupants as defined by OSHA regulations 29 CFR 1910.1025 and 29 CFR 1926.62 above the OSHA PEL.
2. Lead ingestion exposure, such as that resulting from deteriorating LBP in cafeterias.
3. Lead contamination of shoes and clothing, which may be transported to an employee's home.
4. Environmental contamination.

As

The risk assessor must prepare a written report (required by EPA regulations, a 40 CFR 745) that includes recommendations for abatement of any LBP-related hazards. A risk assessment must also determine the presence, type, severity, and location of lead-is usually based paint hazards (including lead hazards in paint, dust, and soil) with suggested ways to control them. This information will be provided in a final report of findings. It should be noted that risk assessments are not always required. Ifon an inspection. But if only a small amount of LBP or other LCM is involved, a targeted lead test may suffice. See "Determining Whether a Risk Assessment,an Inspection or a Targeted Lead Test Is Required" on page 129.

Correcting the Hazard

If a final writtenA risk assessment that indicates potential for exposure to lead above the OSHA PEL, it will require promptrequires immediate action by facility managementthe installation head to correct the exposure hazard. ASMs and facilities environmental specialists should be contacted prior to any work being performed.

Requiring Safe Work Practices

Lead-in-Construction Work

OSHA defines lead-in-construction work as:

- Demolition or salvage involving LBP or other LCM.
- Removal or encapsulation of LBP or other LCM.
- New construction, alteration, repair, or renovation of structures, substrates, or portions of structures or substrates containing lead.
- Maintenance operations associated with construction activities.

Lead-in-Construction Standard

OSHA's lead-in-construction standard (29 CFR 1926.62)~~(29 CFR 1926.62)~~ applies whenever construction, repair, renovation, ~~(including painting and decoration),~~ or demolition activities are undertaken. The standard does not apply to routine maintenance, such as routine, scheduled cleaning and repainting that involves minor surface preparation.

Lead-in-Construction Work

OSHA defines lead-in-construction work as:

- Demolition or salvage involving LBP or LCM.
- Removal or encapsulation of
- LBP or LCM.
- New construction, alteration, repair, or renovation of structures, substrates, or portions of structures or substrates containing lead.
- Maintenance operations associated with construction activities documented by the lead-competent person, in accordance with OSHA regulations.

Prohibited Work

If LBP or ~~other~~ LCM is present, Postal Service employees may not perform:

1. Tasks listed in the lead-in-construction standard that are presumed to expose employees to airborne lead levels above the OSHA PEL. These tasks require interim protection (see Attachment 2, OSHA-Defined Tasks Requiring Interim Employee Protection).
2. Tasks for which a negative initial determination (NID) cannot be documented by the lead-competent person, in accordance with OSHA regulations.

Approved Work

If LBP or ~~other~~ LCM is present, Postal Service employees may perform tasks not listed under *Prohibited Work*, if the work is performed:

1. Using the Postal Service ~~-~~approved work practices~~work practices~~ established by Safety and OSHA Compliance Programs (SOCP~~Environmental Performance Management (SEPM~~) and Maintenance Technical Support~~Policy and Programs, Engineering~~.
2. In accordance with the prohibitions described in *Prohibited Work* so ~~to ensure~~ that a NID of lead risk can be documented.
3. By Postal Service employees who are trained, are properly equipped, and follow Postal Service-approved work practices. ~~approved work practices.~~

Note: *Wet ~~-~~scraping and removal of small areas of LBP before welding and drilling holes through walls coated with LBP is an example of a Postal Service ~~an~~ approved work practice.*

For further information, consult the lead section of the Safety Resources Page~~Safety Toolkit Web site~~ and MMO-115-09 on *Lead Work Practices.* ~~the current MMO on *Lead Work Practices.* (See Resources on page 22 for directions to Web sites.)~~

General Industry Standard

Certain tasks not covered by the lead-in-construction standard, but which may pose a lead hazard, are covered by OSHA's general industry standard (29 CFR 1910.1025). ~~.~~ These tasks may include enclosed abrasive blasting, scraping, and painting of mailboxes; production lead soldering; and working in firing ranges. Postal Service safety personnel or contractors must evaluate these operations for potential exposure to lead.

If there is a potential to exceed OSHA's AL~~action level~~ for airborne lead ~~is exceeded~~, then Postal Service employees must not perform these tasks unless they use the protection required by OSHA (see General Industry Standard on page 3).

When~~2).~~

~~If damage is insignificant, then these~~ routine repainting and cleaning tasks are not covered under the lead-in-construction standard. ~~However~~, the general industry standard for lead requires an initial exposure determination if paint in poor condition has the potential to create a hazard.

Other OSHA Regulations

To protect employees, managers must comply with other OSHA regulations, such as those governing hazard communication, protective equipment, and noise, as appropriate.

Training

All Postal Service Employees

All Postal Service employees working with LBP and/or ~~other~~ LCM must receive training in:

1. Hazard communication specific to lead.
2. Postal Service-approved Lead Work Practices~~2. Approved lead work practices~~ (so that they do not create lead dust or fumes).

Tasks With Exposure Potential

Postal Service maintenance tasks with exposure potential if LBP or ~~other~~ LCM is present include:

- Removing paint by dry-scraping and sanding.
- Using power tools or heat guns.
- Making alterations that involve removing drywall, structural steel, or other building components.
- Welding and cutting on coated metal railings.
- Abrasive blasting of mail boxes.
- Moving or cleaning abrasive blasting enclosures.

Employees Who Are Exposed to Airborne Lead or Perform Tasks That Require Interim Protection

Postal Service employees are normally not required to take annual OSHA lead training. However, OSHA's lead-in-construction and general industry standards require annual lead hazard training for employees who:

1. Are exposed to airborne lead at or above~~that exceeds~~ the OSHA AL~~action level~~.
2. Perform tasks that require interim protection (see attachment 2).

To avoid employee exposure to lead and be cost-effective, Postal Service policy prohibits employees from performing tasks (1) listed in Attachment~~attachment~~ 2 that cannot be documented with an ~~a negative initial determination~~ (NID~~,~~), or (2) that exceed~~sexceed~~ the OSHA AL~~action level~~ as determined by air monitoring.

Competent Persons

OSHA defines a *competent person* as "one who is capable of identifying existing and predictable Lead~~lead~~ hazards in the surroundings or working conditions and who has authorization to take prompt corrective measures and eliminate them" (29 CFR 1926.62(b)).~~(29 CFR 1926.62(b)).~~

EPA has not set forth requirements for the training and certification of~~for~~ persons working with LBP in~~In~~ public and commercial buildings, but may do so in the future (40 CFR 745.229).~~(40 CFR 745.229).~~ Until EPA issues such regulations, the Postal Service requires training for lead-competent persons that will provide them with the following knowledge and abilities:

1. Knowledge of:
   a. Lead health hazards.
   b. Prohibited work (see attachment 2).
   c. Lead Work Practices~~work practices~~ approved by the Postal Service.

d. Policies and procedures for maintenance of LBP.

e. Resources to support management of LBP.

2. Ability to:
   a. Recognize the potential presence of LBP or ~~other~~ LCM.
   ~~b. Perform an NID.~~
   b. Perform an NID.

Note: *Competent persons also must be familiar with the federal, state, and local regulations that may be applicable ~~and must be followed~~ when abating lead hazards, and ensure they are followed.*

Contractor Safety and Health

All work performed by contractors must be done in accordance with Postal Service policy, and approved statements of work. Contractors must be monitored periodically ~~so~~to ~~ensure~~ that their activities do not create LBP or LCM hazards and that they comply with applicable OSHA regulations. Consult Handbook EL-800, *Managing Contract Safety and Health Compliance* (see ~~EL-800, *Managing Contract Safety and Health Compliance* (see~~ Resources on pages 24-26~~page 22~~).

Identifying the Presence of Lead and Lead Hazards

There are two ways to identify the presence of lead ~~hazards~~:

- Inspection.

~~1. Inspections.~~

- ~~2.~~ Targeted lead test (TLT).~~tests.~~

And one way to determine a lead hazard:

- Risk assessment.

Determining Whether a Risk Assessment,~~an~~ Inspection or a Targeted Lead Test Is Required

Determining whether to perform a risk assessment,~~an~~ inspection or ~~a targeted lead test (~~TLT~~)~~ for the presence of LBP or ~~other~~ LCM is a joint~~local~~ decision between Management, Safety and Facilities that is based on the scope of the work, cost-benefit considerations, and other factors. This section presents Postal Service requirements, based on applicable federal regulations, for making that determination. Applicable state~~State~~ and local LBP regulations may require additional inspections or other activities.

Choosing Testing Procedures

Risk Assessments

Risk assessments are only ~~***Note:*** In child-occupied spaces, an inspection is always~~ required when~~.~~

~~Suspected Hazard~~

~~An inspection, combined with a risk assessment, is usually required if,~~ ~~in the opinion of~~ a safety and health or environmental professional (Postal Service or contractor), believes the condition of LBP or ~~other~~ LCM may pose a hazard to employees or other building occupants.

~~Child-Occupied Spaces~~

~~An inspection is required:~~

Before converting any Postal Service-controlled space for use as a child-occupied facility as defined by 40 CFR 745.

2. For any Postal Service space occupied by children.

Space Acquisition

If an environmental or safety review of a proposed space or property indicates that deteriorating paint or other material may pose a health hazard or create environmental liabilities to the Postal Service, then an inspection or a TLT may be required before the space is acquired (see Handbook RE-6).

Other Construction

If lead is present that may result in employee exposures or environmental releases, then an inspection or a TLT may be required before any construction, demolition, repair, or alteration activity is performed.

Nonroutine Work

The performance of reactive or other nonroutine, maintenance-related, construction work on Postal Service-owned or -leased facilities could trigger the need for "interim employee protection" under OSHA's construction industry standard. Conducting a TLT is usually sufficient before such work is performed (see attachment 2).

Choosing Inspection and Testing Procedures

Inspections

When all (or a significant portion) of a facility is to be inspected for the presence of LBP, such as when a renovation is planned, an inspection must be performed:
inspection must be performed:

1. By an inspector or risk assessor accredited under 40 CFR 745.226.40 CFR 745.227.

2. Using a validated test method and following procedures required by 40 CFR 745.227.40 CFR 745.227.

Targeted Lead Tests

When a small area will undergo demolition, repair, alterationBefore undertaking minor reactive or renovation, a TLT may be used toother nonroutine tasks that may create lead dust or fumes (such as those listed in attachment 2), the competent person must determine lead content when no other dataif LBP is available. This should include sampling present by:

1. Reviewing samples from previous inspections;

2. Performing an inspection; or

~~3. Performing a TLT of~~ all layers of paint ~~and coatings~~ that ~~will~~may be ~~impacted~~disturbed.

Note: *The presence of lead in paint or coatings may be assumed in any layer of paint applied before 1978 (see Protecting Workers and Building Occupants From Lead-Based Paint or Other Lead Containing Materials on page 5).*

A TLT must be accomplished by a validated test method, such as:

1. Paint chip sampling~~1. Atomic absorption spectrometry (AAS) analysis of paint chips~~ by an accredited inspector or risk assessor~~laboratory~~.
2. X-ray fluorescence (XRF) analysis of paint by an accredited inspector or risk assessor ~~or other method.~~

It should be noted that an atomic absorption spectrometry (AAS) analysis of paint chips is required:

1. When it is determined by the environmental contractor or inspector that XRF results are inconclusive.
2. To confirm lead content (if needed), specifically when differentiating between lead-based paint (contains lead equal to or exceeding 1.0 mg/cm^2 or 0.5% by weight) and paint commonly known as "lead-containing" (contains lead less than 1.0 mg/cm2 or 0.5% by weight).

Note: *All paint chip samples must be analyzed by an accredited laboratory, using approved methods (e.g. AAS).*

It should be noted that OSHA standards cover activities that disturb paint ~~3. Chemical test for lead, using a kit recommended by OSHA (see http://www.osha.gov/SLTC/leadtest/intro.html).~~

~~Negative results~~ with ~~a portable lead XRF detector or by chemical testing — less than 1 mg/m^2 — must be confirmed with an AAS analysis of paint chips.~~

~~If~~ *any* measurable concentration of lead, therefore ~~appropriate amount of lead is detected by testing or if lead is assumed to be present, OSHA regulations apply. Appropriate~~ work practices and other precautions must be taken. Consult the most recent OSHA regulations~~literature~~ on lead to comply:~~testing for approved methods. (See Resources on page 22.)~~

- OSHA General Industry Lead Regulations: 29 CFR 1910.1025.
- OSHA Construction Industry Lead Regulations: 29 CFR 1926.62.

Lead Management Written Program

Compliance Elements

The mere presence of LBP or~~and other~~ LCM does not automatically trigger the application of OSHA general industry or construction standards for lead. These standards focus on the *potential for employee exposure to lead.* Therefore, Postal Service policy is as follows~~designed to ensure compliance by~~:

1. Prohibit~~Prohibiting~~ activities or tasks that OSHA has identified as potentially hazardous.
2. Require~~Requiring~~ that lead be identified:
   a. Before performing activities that might disturb it.
   b. If a health hazard is suspected.

3. Require OSHA Written Programs for LeadRequiring written management programs to:

   a. Comply with applicable OSHA regulations.

   b. Deal with the potential for human exposure to or environmental releases of lead (e.g., the presence, amount of, and potential for, LBP or LCM dust or fume releases (aerosolization).)).

Note: The term *lead written program* has been used interchangeably with *operations and maintenance (O&M) program*. OSHA does not require O&M programs for lead. The term is used in asbestos regulations and is sometimes applied to lead control regulations. Written O&M programs may cover a wide range of elements designed to control LBP or LCM and prevent exposure. However, written O&M programs are not required for every facility with LBP or LCM.

Requirement for an OSHAa Written Program for Lead

What Triggers the Requirement for an OSHAa Written Program for Lead?

A facility is required to have an OSHA Written Program for Lead,a written lead management program if LBP or LCM is present in a form that may trigger OSHA or other requirements. The presence of LBP or LCM in such a form is determined by an inspection, a TLT, or the presumption of lead (e.g., paint applied before 1978). See Identifying the Presence of Lead and Lead Hazards on page 119 for a discussion of whether to conduct an inspection or a TLT.

What Comprises a Written Program?

A written program must include the program elements appropriate to control the potential for aerosolization of LBP and LCM and minimize the exposure of employees and customers. (For additional information, see the Safety Web site described in Resources on page 22.)

Lead Program Template

There is no "one size fits all" template for an OSHA Written Program for Lead.a written lead program. Responsible personnel must customize the template for a written lead program to address the conditions at their own facility. The Safety Resources Lead PageSafety Toolkit Web site provides a sample template. (see Resources on page

22). The table below provides examples of types of facilities, risk for exposure or release, and the program elements required in the written lead management program.

Facility Description	Risk for Exposure or Release	Program Elements (examples)
Office with LBP in good condition on doors and windows	Minimal	• Employee hazard communication (HazComhazcom). • TLT. • Maintenance Work Practiceswork practices. • Disposal activities that
Lobby with trace Leadlead in retail finishes or signage	Insignificant	• Disposal activities that comply with applicable regulations.
Historic building with extensive LBP in deteriorating condition	• Moderate employee exposure • Significant release potential	• Inspection. • HazComHazcom. • Work Practices• O&M program and maintenance work practices in accordance with historic requirements. • Risk assessment and abatement. • Disposal activities that comply with applicable regulations.
Network DistributionBulk Mail Center with LBP on structural steel	Moderate to significant	• Inspection or TLT. • Maintenance Work Practiceswork practices. • O&M program. • Disposal activities that comply with applicable
Administrative office with computer monitors made of LCM glass	Insignificant	• Disposal activities that comply with regulations.

Facility Description	Risk for Exposure or Release	Program Elements (examples)
Vehicle Maintenance Facility with yellow paint (e.g. handrails, safety striping, bollards, etc.)	Minimal	• HazComHazcom. • Procedures to prevent disturbance. • Disposal activities that comply with applicable regulations.
Office with elevated lead levels in drinking water (source: coolers or building plumbing system)	Minimal to significant, depending on lead concentration in water	• Hazcom. • Alternate sources of potable water. • Abatement. • Disposal activities that comply with regulations.

Roles and Responsibilities

Headquarters

This person or organization...	Is responsible for...
Chief Human Resources Officer, Vice President, Employee Resource Management (ERM), Human Resources (HR)	• Serving as the Chief Environmental Officer for the Postal Service. • Communicating safety and healthenvironmental policies, including those pertaining to lead hazard management
Vice President, Employee ResourceDirector, Safety and Environmental Performance Management (SEPM), ERM, HR	• Establishing strategic direction and overseeing the Postal Service's safety and healthenvironmental management program, including lead hazard management. • Coordinating with Maintenance Technical SupportPolicies and Programs, and other Headquarters functional organizations to establish the

This person or organization...	Is responsible for...
Manager, Safety and OSHA Compliance Programs (SOCP), ERM, HR	• Assisting other Headquarters functional organizations to prepare technical aspects of policies, publications, and procedures that relate to OSHA, EPA, and state compliance and employee safety and health issues. • Maintaining liaison with OSHA on national lead issues.
Chief Sustainability Officer, Office of Sustainability, Deputy Postmaster General	• Developing, supporting, and overseeing the Postal Service's environmental compliance management program, including the national hazardous waste management program. • Developing policies and procedures that support the national hazardous waste management program. • Establishing national policies and procedures to comply with applicable environmental regulations. • Assisting other Headquarters functional organizations to establish policy, publications, and procedures to integrate lead control into Postal Service operations related to environmental compliance. • Maintaining liaison with EPA and state agencies on environmental compliance issues.

This person or organization…	Is responsible for…
~~Director, Safety and Environmental Performance Management (SEPM), ERM, HR (Cont'd)~~Vice President, Facilities	• ~~Establishing~~Assisting ~~other Headquarters functional organizations to prepare technical aspects of~~ policies~~, publications,~~ and procedures for real
Manager, Maintenance Operations, Operations~~Environmental Policy and Programs (EPP), SEPM, ERM, HR~~	• Developing~~, supporting, and overseeing the Postal Service's environmental management program, including the~~ national maintenance~~lead hazard waste management program.~~ • ~~Developing policies and procedures that~~
Managers of Planning, Implementation, Leasing, Real Estate & Assets, and Repair and Alterations, Facilities	• Taking into account the presence of LBP and other LCM (such as soils) in management of property and buildings, including management of new space
Federal Historic Preservation Officer, Facilities	• Consult with Cultural Management Resources Plan for planning and approval of LBP abatement activities that involve

This person or organization...	Is responsible for...
~~Vice President, Facilities~~Other Headquarters Functional Organizations, e.g. Supply Management, Retail and Customer Service Operations , ~~Fleet Management~~	• ImplementingEstablishing policies and procedures ~~to ensure~~ that includeall ~~real estate, design, construction, repair, and alteration actions~~
Other Headquarters field units~~Manager, Maintenance Policies and Programs, Engineering~~	• FollowingDeveloping ~~national maintenance~~ policies and establishing processes as needed so that projects or other activities under their control do not violate applicable OSHA or environmental regulations or Postal Service policy regarding~~procedures for~~
General Counsel, Law Department~~Managers, Facilities Service Offices (FSO)~~	• ~~Taking into account the presence of LBP and other LCM (such as soils) in management of property and buildings, including management of new space acquisitions, out-leases, subleases, transfer of real property, renovation, alteration,~~

This person or organization...	Is responsible for...

Managers, Facilities Service Offices (FSO) (Cont'd)	• For real estate:
	  • Considering the presence and condition of LBP or LCM (including soils and in potable water systems) in or on new space in accordance with Handbook RE-6.
	  • Coordinating with environmental and safety managers if any of the following are discovered: LBP, LBM, or lead in water systems.
	• For design and construction, consulting with the FSO Historic Coordinator for planning and approval of LBP abatement activities that involve potentially historic buildings and their components.

Other Headquarters Functional Organizations, e.g. Supply Management, Retail, Vehicle Management	• Implementing policies and procedures that include lead hazard management, when applicable.
Material Service Centers, and other headquarters field units	• Following policies and establishing processes as needed to ensure that projects or other activities under their control do not violate OSHA or environmental regulations or Postal Service policy regarding lead hazard management.
Chief Environmental Counsel, General Counsel	• Conducting legal research, monitoring laws and regulations, and issuing opinions and interpretations of environmental laws and Postal Service policies related to lead in response to specific questions and issues.

Areas

This person or organization...	Is responsible for...
Vice Presidents, Area Operations	• Exercising overall responsibility ~~for employee safety and health and~~ for compliance with safety and health and environmental regulations, including lead hazard management.

Managers, Safety (Area), HR	• Evaluating area-wide and district lead hazard management activities and processes that may affect ~~the health of~~ employees and other building occupants.
	• Advising management and providing technical assistance on management of ~~employee~~ lead hazards.
	• Maintaining liaison with local, federal, and state OSHA officials on compliance issues.
	• Coordinating with the:
	  • District Safety staff~~Area Manager, Environmental Programs,~~ on hazard communication when LBP inspections or risk assessments are conducted.
	  • ~~Area~~ Manager, Maintenance Operations (Area), Operations Support, concerning area and district maintenance processes

This person or organization...	Is responsible for...
Managers, Maintenance Operations (Area), Operations Support	• Assisting field maintenance organizations to fulfill their responsibilities for lead hazard management. • Training maintenance supervisors as competent persons. • ComplianceEnsuring compliance with other processes established by Maintenance Policies and Programs.
RegionalManagers, Environmental Compliance staff, Sustainability Programs	• Coordinate and liaison communications with environmental regulatory agencies. • Provide guidance and support to districtEnsuring that lead hazard management and others to ensure that managers followprocesses protect the environment and comply with applicable federal, and state, and local environmental lead regulations.
SafetyEnvironmental Specialists, Safety, HR	• Providing guidance and support to district management and others for compliance with applicableto ensure that managers follow federal, state, and local safetyenvironmental regulations. • Coordinating lead inspections and risk assessments using inspectors or risk assessors qualified in accordance with 40 CFR 745. 40 CFR 745. • Coordinating with Facilities, maintenance, on conduct of lead inspections, TLTs, risk assessments, and abatements as necessary or aswater sampling when requested by management

This person or organization...	Is responsible for...
SafetyEnvironmental Specialists, Safety, HR (Cont'd.))	• Coordinating with competent persons on procedures for lead determinations to addressavoid lead exposures ofto employees or customers during nonroutine maintenance. • Interacting with the FSO, the Facilities, the Facilities Response Line Single Source Provider program, district and plant safety staff, and others to monitorensure proper conduct of abatement projects in accordance with 40 CFR 745.227 and applicable state
Other Area Managers	• Establishing procedures for compliance with applicableas necessary to ensure that projects or other activities under their control do not violate OSHA regulations, environmental regulations, or Postal Service policy regarding lead hazard management

Districts
~~Performance Clusters~~

This person or organization...	Is responsible for...
District and Plant Managers	• Exercising overall responsibility for employee safety and health and for compliance with environmental, health and safety regulations, including lead hazard management, in facilities under their control.
District Safety Managers, Safety Specialists, Medical Personnel and others with Safety Duties	• Routine~~Through routine~~ inspection, evaluation, and observation, to advise~~advising~~ management on proper lead hazard control for~~in order to protect employee health and ensure~~ compliance with applicable OSHA regulations. • Providing for employee lead air monitoring, medical evaluations, or surveillance as necessary. • Coordinating with Facilities and Area Safety Managers~~the area environmental specialist, competent person, FSOs, and others~~ as necessary on risk assessments, control measures, and abatements. • Assisting management to provide employees and other building occupants with lead

This person or organization...	Is responsible for...
Installation Heads, Middle Level Managers, and Supervisors	• Managing lead hazard management and regulatory compliance. - Preparation of written program for lead, if required. • Confirming~~• Ensuring~~ that maintenance, renovation, construction, and other activities and tasks do not present a lead hazard. • Having~~Ensuring that~~ a competent person oversee~~oversees~~ work involving LBP. • Requesting lead Inspections~~inspections~~ or TLTs as necessary before work. • Using Postal Service-approved work practices. • Supplying personal protective equipment and other lead-control equipment and providing instruction in its use. • Consulting with ~~Area and District~~ Maintenance, Safety, Environmental, Facilities, and ~~FSO, and~~Training staff for assistance. ~~Training staff for assistance.~~

Resources

This is a guide to resources and reference materials, especially those online, mentioned in this MI.

Federal Government

Code of Federal Regulations

The Code of Federal Regulations (CFR) can be searched online at:

~~http://www.gpoaccess.gov/cfr/.~~

~~OSHA~~ https://www.ecfr.gov.

~~regulations can also be found at *http://www.osha.gov*. In the left column, under "Laws and Standards," click on *Standards*. This will take you to regulations in the 29 CFR series.~~

CFR citations in the MI include:

- 29 CFR 1910.1025,~~29 CFR 1910.141, Sanitation.~~
- ~~29 CFR 1910.1025,~~ Lead (general industry standard).
- 29 CFR 1926.62,~~29 CFR 1926.62,~~ Lead (construction industry standard).

- 40 CFR 261.24,

- ~~40 CFR 141, National primary drinking water regulations (Safe Water Drinking Act).~~
- ~~40 CFR 142–149, (Additional Safe Water Drinking Act regulations).~~
- ~~40 CFR 261.12,~~ Toxicity characteristics.
- 40 CFR 745,~~• 40 CFR 745,~~ Lead-based Paint~~paint~~ poisoning prevention in certain residential structures.

Occupational Safety and Health Administration

OSHA's website is found at: http://www.osha.gov/. Under the "regulation" tab you can find the 29 CFR series, and specifically regulations and standards on lead.

Environmental Protection Agency

EPA's Website~~Web site~~ is found at: http://www.epa.gov/. ~~*http://www.epa.gov/.*~~ Under "Quick Finder," you can click "Clean Air Act"~~, *Clean Water Act,*~~ and "Lead" to get detailed information about those topics.

~~EPA 812-B-94-002, *Lead in Drinking Water in Schools and Non-residential Buildings,* April 1994, is available online at: *http://www.epa.gov/safewater/consumer/leadinschools.html.*~~

Department of Housing and Urban Development

HUD's Office of Lead Hazard Control and Healthy Homes (OLHCHH) website can be found at: https://www.hud.gov/program_offices/healthy_homes.
~~HUD's publication, *Guidelines for the Evaluation and Control of Lead-Based Paint in Housing,* 1990, is found at: *http://www.hud.gov/offices/lead/leadreferencelibrary.cfm.*~~

Postal Service

Safety Resources ~~and the Safety Toolkit~~

The Safety Resources page on the Postal Service Intranet is your portal to information and tools for safety management. Go to http://blue.usps.gov. ~~*http://blue.usps.gov.*~~ In the left column, under "Essential Links," and click on Safety Resources. Here you can find the *Lead Hazard Management Program Guide*, which is available by clicking on the A-Z index, scrolling down to the letter "L," and clicking on "Lead."

~~The *Lead Hazard Management Program Guide* is available on the~~ **Safety Toolkit**

~~Web site.~~ The *Safety Toolkit* is an online, interactive management tool for safety personnel, who use the toolkit to record and track facility inspections, Program Evaluation Guide inspections~~Guides~~, and OSHA citations. To reach the Toolkit~~toolkit~~ from the Safety

Resources page, click on *Safety Toolkit Information* found in the left column. To use the Safety Toolkit you must set up an account with a password. (available only to safety personnel). Instructions can be foundare on the Safety Resources Home Page at http://safetytoolkit.usps.gov:12/. Click on "STK User Guide". Toolkit Web site.

Maintenance Technical Support Center

The Maintenance Technical Support CenterMaintenance Technical Support Center (MTSC) provides information to Postal Service field technicians. The following Maintenance Management Order (Orders (MMOs) are available online at: *http://www.mtsc.usps.gov/bulletin/Bulletin_Search.cfm.*

- Current MMO) for on *Water Sampling.*
- Current MMO on Lead Work Practices can be found on the MTSC Website here: http://www.mtsc.usps.gov/pdf/mmo/2009/mmo11509.pdf.

PolicyNet

AdditionalThe following publications related to the handling of LBP and LCM are available online at the *PolicyNet* website:*PolicyNet* Web site: *http://blue.usps.gov/cpim:*

- Handbook EL-800, *Managing Contract Safety and Health Compliance*.
- Handbook EL-800, *Managing Contract Safety and Health Compliance*, May 2001.
- Handbook RE-6, *Facilities Environmental Guide*, November 2004.

Other

Lead-Based Paint: Operations & Maintenance Work Practices Manual for Homes and Buildings, May 1995, a free download, is available from the National Institute of Building Sciences for $105. Go to: https://www.wbdg.org/ffc/nibs.*http://www.nibs.org/pubslead.html.*

Occupational Safety and Health Administration

General Industry Standard (29 CFR 1910.1025)

Under this standard, occupational exposures to lead are regulated for people other than those who work in construction and agricultural operations. This standard:

1. Establishes an airborne exposure limit of 50 micrograms per cubic meter (50 µg~~/g~~/m^3) as an 8-hour, time-weighted average.
2. Requires semiannual monitoring of blood lead level (BLL) for workers exposed to airborne Lead~~lead~~ at or above an AL~~action level~~ of 30 µg~~/g~~/m^3 and medical removal of workers with elevated BLL.
3. Provides salary retention for medically removed workers.
4. Requires control measures, such as the use of personal protective equipment, hygiene facilities, and medical surveillance measures.

A key provision that triggers the application of this standard is an employer's Initial Exposure Determination~~initial exposure determination~~ that an employee is overexposed (29 CFR 1910.1025(d)(2)~~).).~~)

Construction Industry Standard (29 CFR 1926.62)

Under this standard, occupational exposures to lead in construction activities, such as removing lead-based paint, are regulated. The standard requires the employer to:

1. Assess whether employees are exposed to lead at or above an AL~~action level~~.
2. Employ suitable compliance measures, such as engineering and work practice controls, and establish an administrative program, training, respiratory protection, hygiene facilities, and medical surveillance.

Lead-related operations may include activities such as demolition of structures, manual scraping and sanding, use of heat guns, and power tool cleaning with dust collection systems (including needle guns). Also addressed are abrasive blasting, welding, cutting, and torch burning.

Under the standard, a Negative Initial Determination~~an NID~~ can be made to lower the level of protective measures. The NID is similar to a Negative Exposure Assessment~~negative exposure assessment (NEA)~~ for asbestos.

~~Sanitation Standard (29 CFR 1910.141)~~

~~Under this standard, drinking water must meet federal or state standards, including those for lead content.~~

Environmental Protection Agency

Under EPA regulations, a waste is considered hazardous if it has a concentration of 5.0 milligrams or more lead per liter when tested by the toxicity characteristic leaching procedure (40 CFR 261.24).

Resource Conservation and Recovery Act

Under the Resource Conservation and Recovery Act (RCRA), waste material from LBP and LCM abatement projects may have to be disposed of as hazardous waste. Examples of such waste include paint chemically stripped from components, spent media from vacuum blasting operations, small painted components, cleanup debris (plastic barriers, protective clothing, etc.), and contaminated soils.

RCRA establishes procedures for:

1. Identifying the generator of lead hazardous waste.
2. Preparing a hazardous waste manifest that must be used with attendant reporting procedures.
3. Engaging a licensed hazardous waste transporter to haul the waste.
4. Sending the waste to a permitted treatment, storage, or disposal facility.

~~Residential Lead-Based Paint Hazard Reduction Act of 1992~~

~~Under this act (Title X of Public Law 102-550), EPA regulates LBP activities in target housing and child-occupied facilities (40 CFR 745). The act requires disclosure for sellers and lessors, training certification, and work practice procedures for conducting lead-based paint activities in target housing and child-occupied facilities. Some postal facilities may share space with child care facilities or other functions covered by this Act.~~

~~The Safe Drinking Water Act (40 CFR 141–149)~~

~~The act sets standards for lead in drinking water and prohibits the use of lead components in potable water systems.~~

Attachment 2

OSHA-Defined Tasks Requiring Interim Employee Protection (29 CFR 1926.62)

	Description	Tasks
Group 1	Tasks in this group are presumed to create exposures up to 10 times the permissible exposure limit (PEL) where lead-based paint (LBP) or other lead-containing material (LCM) is present.	1. Dry manual demolition of structures (e.g. dry wall); 2. Dry manual scraping; 3. Dry manual sanding; 4. Heat gun applications; 5. Power tool with dust collection systems
Group 2	Tasks in this group are presumed to create exposures 10 to 50 times the PEL where LBP or ~~other~~ LCM are~~is~~ present.	1. Using lead-containing mortar; 2. Lead burning; 3. Rivet busting; 4. Power tool cleaning without dust collection systems; 5. Cleanup activities where dry expendable abrasives are used; 6. Abrasive blasting enclosure;
Group 3	Tasks in this group are presumed to create exposures more than 50 times the PEL where LBP or ~~other~~ LCM are~~is~~ present.	1. Abrasive blasting; 2. Welding on steel structures; 3. Cutting on steel structures; 4. Torch burning (gas welder) on steel structures;

Attachment 3
Definitions

Abatement. Any measure or set of measures designed to permanently eliminate lead-based paint hazards (see 40 CFR 745.223).

Action level (AL). Employee exposure, without regard to the use of respirators, to an airborne concentration of lead of 30 micrograms per cubic meter of air (30 ug/m3) calculated as an 8-hour, Time-weighted Average.

Competent person. One who is capable of identifying existing and predictable lead hazards in the surroundings or working conditions and who has authorization to take prompt corrective measures to eliminate them (29 CFR 1926.62).

Construction work. Work for construction, alteration, and/or repair, including minor renovation work (e.g. painting or decorating). It includes but is not limited to the following:

- Demolition or salvage of structures where lead or material containing lead is present.
- Removal or encapsulation of material containing lead.
- New construction, alteration, repair, or renovation of structures, substrates, or portions thereof that contain material containing lead.
- Installation of products containing lead.
- Lead contamination/emergency cleanup.
- Transportation, disposal, storage, or containment of lead or material containing lead at locations where construction activities are performed, and maintenance operations associated with the construction activities described in this paragraph.

Construction work does not include routine cleaning and repainting, such as minor surface preparation and repainting of offices, where there is insignificant damage, wear, or corrosion of existing Lead-containing paint and coatings or substrates.

Hazardous waste. Waste that can pose a hazard, or a potential hazard, to human health or the environment when managed improperly. RCRA regulations characterize a waste as hazardous if it possesses a hazardous waste characteristic (ignitability, corrosivity, reactivity, or toxicity) or if EPA specifically lists it as a hazardous waste. LBP and debris containing LBP could be considered hazardous.

Initial exposure determination. The process of monitoring employee lead exposures, using any information, observations, or calculations that indicate employee exposure to lead; any previous measurements of airborne lead; or any employee complaints. Previous measurements made within 12 months may be used if applicable. Previous results demonstrating that a particular product or activity cannot result in employee exposure above the AL can be used.

Inspection. A surface-by-surface investigation of the building interior and exterior to determine the presence of LBP or LCM, and report that describes the findings of that investigation. An inspection applies to all or a significant portion of a building. Inspections must be conducted in accordance with 40 CFR 745.

Lead. Metallic lead, all inorganic lead compounds, and organic lead soaps (the lead salt of an organic acid, the latter usually being a fatty acid). Excluded from this definition are all other organic lead compounds.

Lead-based paint (LBP). Paint or other surface coatings (such as varnishes and lacquers for example on wood floors) that contain lead. 40 CFR 745 further defines LBP as paint that contains Leadlead equal to or in excess of 1.0 milligrams per square centimeter, or more than 0.5 percent by weight. OSHA has no minimum amount or concentration of lead that triggers a determination that lead is present. Individual states may also have published LBP definitions that may be applicable.

Lead-containing material (LCM). Any material that contains lead, such as solder, lead-contaminated dust or soil, spent bullets, Leadand lead weights, and even some paints not considered LBP.

Negative Initial Determinationinitial determination (NID). A documented (in writing) determination by a competent person that no employees are exposed to Leadlead at or above the ALaction level. The determination is made using the methods prescribed in the standard, including the use of objective data.

Permissible exposure limit (PEL). Lead at concentrations greater than 50 micrograms per cubic meter of air (50 µgug/m3) averaged over an 8-hour period (TWA).

Risk assessment. An on-site investigation to determine the existence, nature, severity, and location of LBP hazards, and the provision of a report by the individual or the firm conducting the Risk Assessmentrisk assessment, explaining the results of the investigation and options for reducing LBP hazards. Until 40 CFR 745.228–233 isare promulgated, Risk Assessmentrisk assessment in the context of the postal workplace addresses the potential for occupational exposure, transport of Leadlead contamination to the employee's home, and environmental releases.

Targeted lead test (TLT). A test of all layers of paints and coatings that may be disturbed for the presence of LBP or other LCM before performing a specific task, such as spot welding a guard rail. Paint chip analysis or other OSHA-approved test methods must be used.

Time-weighted average (TWA). A formula used to compute the cumulative lead exposure for an 8-hour work shift.

Attachment 4
Acronyms

AAS	Atomicatomic absorption spectrometry
AL	Actionaction level
BLL	Bloodblood lead level
~~BMC~~	~~bulk mail center~~
CFR	Code of Federal Regulations
EPA	Environmental Protection Agency
~~EPP~~	~~Environmental Policy and Programs~~
ERM	Employee Resource Management
~~ES~~	~~Environmental Specialist~~
HazCom	Hazard~~FSO Facilities Service Office~~
~~FSSP~~	~~Facilities Single Source Provider~~
~~Hazcom~~	~~hazard~~ communication
HR	Human Resources
HUD	Department of Housing and Urban Development
LBP	Leadlead-based paint
LCM	Leadlead-containing material
MI	Management Instruction
MMO	Maintenance Management Order
NID	Negative Initial Determination~~negative initial determination~~ O&M
	Operationsoperations and Maintenance~~maintenance~~
OSHA	Occupational Safety and Health Administration
PEL	Permissible~~permissible~~ exposure limit
RCRA	Resource Conservation and Recovery Act
SOCP~~SEPM~~	Safety & OSHA Compliance Programs~~and Environmental Performance Management~~
TLT	Targeted~~targeted~~ lead test
XRF~~XFR~~	X-ray florescence

Management Instruction

Lead Hazard Management Program

This management instruction (MI) establishes policy for the control of *lead-based paint (LBP)* and *lead-containing material (LCM)* in Postal Service facilities or on Postal Service property.

Date	November 1, 2018
Effective	Immediately
Number	MI EL-890-2018-
Obsoletes	MI EL-810-1999-1
Unit	Safety and OSHA Compliance

Simon Storey

Vice President
Employee Resource Management

Policy

To provide a safe and healthful work environment for its employees and building occupants, the Postal Service will:

1. Manage and maintain Postal Service property, buildings, and equipment so that LBP and LCM

   do not become a hazard to employees and other building occupants or contaminate the environment. (See Attachment 3, Definitions.)

2. Assess the risk to employees and other building occupants from LBP and LCM and ensure that Postal-approved work practices are followed.
3. Comply with all applicable safety and environmental lead standards and regulations.

Scope

This MI applies to the following:

1. Spaces owned and leased by the Postal Service.
2. Other building spaces occupied by Postal Service employees.
3. Postal Service employees and contractors working for the Postal Service who occupy the spaces described in 1 and 2.
4. Postal Service customers.
5. Tenants leasing space from the Postal Service.

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Regulatory Requirements

Certain Occupational Safety and Health Administration (OSHA), Environmental Protection Agency (EPA), and state environmental lead standards and regulations apply to the Postal Service (see Attachment 1, Regulatory Requirements, for details). Consult Area Safety Managers (ASMs) and your environmental field support specialist regarding lead regulations that may apply to the Postal Service.

Occupational Safety and Health Administration

General Industry Standard

OSHA's general industry standard (Title 29 Code of Federal Regulations (CFR) 1910.1025), applies to exposure to lead in all occupations, except construction and agriculture.

The concept of *Initial Determination* is a key provision of this standard. The regulation states, "Each employer who has a workplace or work operation covered by this standard shall determine if any employee may be exposed to Lead at or above the Action Level" (29 CFR 1910.1025(d)(2)).

OSHA defines the *Action Level (AL)* as employee exposure (without regard to the use of respirators) to an airborne concentration of lead of 30 micrograms per cubic meter of air (30 $\mu g/m^3$) averaged over an 8-hour period (29 CFR 1910.1025(b)). When the initial determination has found the possibility of employee exposure above the AL, an employer must conduct regular monitoring until the lead levels are once again below the AL.

A second key provision of this standard is the *Permissible Exposure Limit (PEL)*, which is the maximum exposure allowed before an employer must take corrective action such as engineering and work practice controls, employee blood monitoring, provision of respirators and frequent sampling. The PEL for lead is currently 50 µg/m3 over an 8-hour period.

Construction Industry Standard

OSHA's construction industry standard (29 CFR 1926.62) applies to "all Construction Work where an employee may be occupationally exposed to Lead." The standard covers construction activities where LBP or LCM may be present, including:

- Demolishing structures.
- Scraping and sanding manually.
- Using heat guns.

- Chemical stripping.
- Cleaning power tools with dust collection systems.
- Blasting, welding, and cutting with abrasives.
- Burning with torches.

Note: *Postal Service requirements fall under both the OSHA General Industry and Construction Industry standards, and should be followed accordingly.*

Environmental Protection Agency

Lead is a pollutant regulated by many laws administered by the EPA, including:

- Toxic Substances Control Act (TSCA).
- Residential Lead-Based Paint Hazard Reduction Act of 1992 (Title X).
- Clean Air Act (CAA).
- Clean Water Act (CWA).
- Safe Drinking Water Act (SDWA).
- Resource Conservation and Recovery Act (RCRA).
- Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA).

Contact your environmental field support specialist for guidance on disposal of LBP and LCM, which is regulated under RCRA and TSCA. LBP and LCM waste may be subject to strict management and disposal standards. Waste material from LBP and LCM abatement projects may have to be disposed of as hazardous waste. Examples of hazardous waste include:

- Paint chemically stripped from components.
- Spent media from vacuum-blasting operations.
- Small painted components.
- Cleanup debris (e.g., plastic barriers and protective clothing).
- Contaminated soil.

The Safe Drinking Water Act

The Safe Drinking Water Act (40 CFR 141–149) sets standards for lead in drinking water and prohibits the use of lead components in potable water systems. *Lead in drinking water is not covered in this MI.* For information on lead in drinking water, see the following Postal documents:

- MMO-049-18, Water Sampling (Lead, Etc.) and Shelf-Life of Bottled Water.
- Environmental Compliance Bulletin – Drinking Water.
- Safety Resources Lead Page.
- MOP-ERM-01-07-2009- Memorandum of Policy on Water Filtration.
- Handbook RE-6 – Facilities Environmental Guide.

Managing Buildings and Equipment with Lead-Based Paint and Lead-Containing Materials

The following apply to work in areas that may contain LBP or LCM:

1. Manage LBP and LCM in Postal Service buildings and property in such a manner that LBP or LCM does not become a hazard to employees or to other building occupants or contaminate the environment.
2. Take into account the presence and condition of LBP and other LCM when managing buildings and property. This includes management of new space acquisitions, out-leases, subleases, transfer of real property, renovation, alteration, construction, and demolition.
3. Maintain LBP and LCM in place by keeping the area(s) in good condition (i.e., no flaking, delamination, or peeling), and applying a top coat, when necessary, to stabilize the paint. Painted surfaces in good condition are not considered a health hazard; however, lead becomes a potential hazard if paint (a) is allowed to deteriorate; (b) is dry-sanded, dry-scraped, or heated; or (c) otherwise becomes inhalable or ingestible, such as during demolition or renovation activities
4. Inform Postal Service employees, contractors, and other building occupants of the presence of LBP and LCM, specifically when they perform tasks that may impact identified materials.

   Note: *Postal Service employees rarely perform tasks that expose them to airborne lead above PELs. However, maintenance or construction-related activities may create lead dust or fumes. Managers can reduce exposure to lead and environmental releases by identifying areas where LBP and LCM are located in the facility, using Postal Service-approved work practices, engineering controls, and properly training employees.*
5. Ensure workers are appropriately certified, following

   EPA training guidelines for lead work.
6. Never purchase materials formulated with lead, and never use such materials in Postal Service equipment or facilities.

7. Prior to leasing or purchasing a space or property, a review of previous environmental testing reports for LBP and LCM is required. If the building owner provides a lead-free certification from the builder, no additional testing is necessary. However, if no sampling data is provided, or testing was not performed, an inspection is required to determine the presence of LBP or LCM.

Lead Abatement

Lead abatement, as defined in 40 CFR 745.223, must be conducted by contractors accredited under EPA and/or applicable state regulations in the following circumstances:

1. Construction or maintenance-related activities that make abatement or de-leading necessary.
2. A risk assessment (performed by an accredited risk assessor) indicates that abatement of lead is required.

Conduct lead abatement in accordance with 40 CFR 745.227 and all other applicable federal and state environmental regulations.

Note: *This includes using certified firms when performing lead abatement, and clearance sampling by a certified lead risk assessor or inspector, when necessary. Consult District Safety for guidance.*

Lead abatement may generate hazardous waste. Facilities and operations that generate hazardous waste are subject to stringent waste management requirements. See MI EL-890-2007-5, *Integrated Waste Management*, and consult your environmental field support specialist for additional information on proper management of hazardous waste.

Worker and Occupant Protection

Assessing the Risk

Maintaining LBP and LCM in good condition is the best practice. However, LBP and LCM in Postal facilities (owned or leased) may have deterioration that presents a hazard to employees or other building occupants. If Management or Safety identifies a lead hazard outside the scope of the Postal Service- approved work practices, an EPA-accredited lead inspector or risk assessor must perform an inspection of the facility (40 CFR 745).

The EPA has not issued protocols for inspections and risk assessments in public and commercial buildings as of the date of this management instruction. However, plans to issue protocols for work practices and training in public and commercial buildings may occur in the future (40 CFR 745.228–230).

In the interim, Postal Service inspections and risk assessments for lead must focus on the potential for:

1. Inhalation exposure as defined by OSHA regulations 29 CFR 1910.1025 and 29 CFR 1926.62 above the OSHA PEL.
2. Lead ingestion exposure, such as that resulting from deteriorating LBP.
3. Lead contamination of shoes and clothing, which may be transported to an employee's home.
4. Environmental contamination.

As required by EPA regulations, a risk assessment must also determine the presence, type, severity, and location of lead-based paint hazards (including lead hazards in paint, dust, and soil) with suggested ways to control them. This information will be provided in a final report of findings. It should be noted that risk assessments are not always required. If a small amount of LBP or LCM is involved, a targeted lead test may suffice. See "Determining Whether a Risk Assessment, Inspection or a Targeted Lead Test Is Required" on page 12.

Correcting the Hazard

If a final written risk assessment indicates potential for exposure to lead above the OSHA PEL, it will require prompt action by facility management to correct the exposure hazard. ASMs and facilities environmental specialists should be contacted prior to any work being performed.

Requiring Safe Work Practices

Lead-in-Construction Standard

OSHA's lead-in-construction standard (29 CFR 1926.62) applies whenever construction, repair, renovation, or demolition activities are undertaken. The standard does not apply to routine maintenance, such as routine scheduled cleaning and repainting that involves minor surface preparation.

Prohibited Work

If LBP or LCM is present, Postal Service employees may not perform:

1. Tasks listed in the lead-in-construction standard that are presumed to expose employees to airborne lead levels above the OSHA PEL. These tasks require interim protection (see Attachment 2, OSHA-Defined Tasks Requiring Interim Employee

Protection).

2. Tasks for which a negative initial determination (NID) cannot be documented by the lead-competent person, in accordance with OSHA regulations.

Lead-in-Construction Work

OSHA defines lead-in-construction work as:

- Demolition or salvage involving LBP or LCM.
- Removal or encapsulation of LBP or LCM.
- New construction, alteration, repair, or renovation of structures, substrates, or portions of structures or substrates containing lead.
- Maintenance operations associated with construction activities documented by the lead-competent person, in accordance with OSHA regulations.

Approved Work

If LBP or LCM is present, Postal Service employees may perform tasks not listed under *Prohibited Work*, if the work is performed:

1. Using the Postal Service-approved work practices established by Safety and OSHA Compliance Programs (SOCP) and Maintenance Technical Support.
2. In accordance with the prohibitions described in *Prohibited Work* so that a NID of lead risk can be documented.
3. By Postal Service employees who are trained, are properly equipped, and follow Postal Service-approved work practices.

Note: *Wet-scraping and removal of small areas of LBP before welding and drilling holes through walls coated with LBP is an example of a Postal Service-approved work practice.*

For further information, consult the lead section of the Safety Resources Page and MMO-115-09 on *Lead Work Practices*.

General Industry Standard

Certain tasks not covered by the lead-in-construction standard, but which may pose a lead hazard, are covered by OSHA's general industry standard (29 CFR 1910.1025). These tasks may include enclosed abrasive blasting, scraping, and painting of mailboxes; production lead soldering; and working in firing ranges. Postal Service safety personnel or contractors must evaluate these operations for potential exposure to lead.

If there is a potential to exceed OSHA's AL for airborne lead, then Postal Service employees must not perform these tasks unless they use the protection required by OSHA (see General Industry Standard on page 3).

When routine repainting and cleaning tasks are not covered under the lead-in-construction standard, the general industry standard for lead requires an initial exposure determination if paint in poor condition has the potential to create a hazard.

Other OSHA Regulations

To protect employees, managers must comply with other OSHA regulations, such as those governing hazard communication, protective equipment, and noise, as appropriate.

Training

All Postal Service Employees

All Postal Service employees working with LBP and/or LCM must receive training in:

1. Hazard communication specific to lead.
2. Postal Service-approved Lead Work Practices (so that they do not create lead dust or fumes).

Tasks with Exposure Potential

Postal Service maintenance tasks with exposure potential if LBP or LCM is present include:

- Removing paint by dry-scraping and sanding.
- Using power tools or heat guns.
- Making alterations that involve removing drywall, structural steel, or other building components.
- Welding and cutting on coated metal railings.
- Abrasive blasting of mail boxes.
- Moving or cleaning abrasive blasting enclosures.

Employees Who Are Exposed to Airborne Lead or Perform Tasks That Require Interim Protection

Postal Service employees are normally not required to take annual OSHA lead training. However, OSHA's lead-in-construction and general industry standards require annual lead hazard training for employees who:

1. Are exposed to airborne lead at or above the OSHA AL.
2. Perform tasks that require interim protection (see attachment 2).

To avoid employee exposure to lead and be cost-effective, Postal Service policy prohibits employees from performing tasks (1) listed in Attachment 2 that cannot be documented with an NID, or (2) that exceeds the OSHA AL as determined by air monitoring.

Competent Persons

OSHA defines a *competent person* as "one who is capable of identifying existing and predictable Lead hazards in the surroundings or working conditions and who has authorization to take prompt corrective measures and eliminate them" (29 CFR 1926.62(b)).

EPA has not set forth requirements for the training and certification of persons working with LBP in public and commercial buildings, but may do so in the future (40 CFR 745.229). Until EPA issues such regulations, the Postal Service requires training for lead-competent persons that will provide them with the following knowledge and abilities:

1. Knowledge of:
   a. Lead health hazards.
   b. Prohibited work (see attachment 2).
   c. Lead Work Practices approved by the Postal Service.
   d. Policies and procedures for maintenance of LBP.
   e. Resources to support management of LBP.

2. Ability to:
    a. Recognize the potential presence of LBP or LCM.
    b. Perform an NID.

Note: *Competent persons also must be familiar with the federal, state, and local regulations that may be applicable when abating lead hazards, and ensure they are followed.*

Contractor Safety and Health

All work performed by contractors must be done in accordance with Postal Service policy, and approved statements of work. Contractors must be monitored periodically so that their activities do not create LBP or LCM hazards and that they comply with applicable OSHA regulations. Consult Handbook EL-800, *Managing Contract Safety and Health Compliance* (see Resources on pages 24-26).

Identifying the Presence of Lead and Lead Hazards

There are two ways to identify the presence of lead:

- Inspection.
- Targeted lead test (TLT).

And one way to determine a lead hazard:

- Risk assessment.

Determining Whether a Risk Assessment, Inspection or a Targeted Lead Test Is Required

Determining whether to perform a risk assessment, inspection or TLT for the presence of LBP or LCM is a joint decision between Management, Safety and Facilities that is based on the scope of the work, cost-benefit considerations, and other factors. This section presents Postal Service requirements, based on applicable federal regulations, for making that determination. Applicable state and local LBP regulations may require additional inspections or other activities.

Choosing Testing Procedures

Risk Assessments

Risk assessments are only required when a safety and health or environmental professional (Postal Service or contractor), believes the condition of LBP or LCM may pose a hazard to employees or other building occupants.

Inspections

When all (or a significant portion) of a facility is to be inspected for the presence of LBP, such as when a renovation is planned, an inspection must be performed:

1. By an inspector or risk assessor accredited under 40 CFR 745.226.
2. Using a validated test method and following procedures required by 40 CFR 745.227.

Targeted Lead Tests

When a small area will undergo demolition, repair, alteration or renovation, a TLT may be used to determine lead content when no other data is available. This should include sampling all layers of paint that will be impacted.

Note: *The presence of lead in paint or coatings may be assumed in any layer of paint applied before 1978 (see Protecting Workers and Building Occupants From Lead-Based Paint or Other Lead Containing Materials on page 5).*

A TLT must be accomplished by a validated test method, such as:

1. Paint chip sampling by an accredited inspector or risk assessor.
2. X-ray fluorescence (XRF) analysis of paint by an accredited inspector or risk assessor

It should be noted that an atomic absorption spectrometry (AAS) analysis of paint chips is required:

1. When it is determined by the environmental contractor or inspector that XRF results are inconclusive.
2. To confirm lead content (if needed), specifically when differentiating between lead-based paint (contains lead equal to or exceeding 1.0 mg/cm^2 or 0.5% by weight) and paint commonly known as "lead-containing" (contains lead less than 1.0 mg/cm2 or 0.5% by weight).

Note: *All paint chip samples must be analyzed by an accredited laboratory, using approved methods (e.g. AAS).*

It should be noted that OSHA standards cover activities that disturb paint with *any* measurable concentration of lead, therefore appropriate work practices and other precautions must be taken. Consult the most recent OSHA regulations on lead to comply:

- OSHA General Industry Lead Regulations: 29 CFR 1910.1025.
- OSHA Construction Industry Lead Regulations: 29 CFR 1926.62.

Lead Management Written Program

Compliance Elements

The mere presence of LBP or LCM does not automatically trigger the application of OSHA general industry or construction standards for lead. These standards focus on the *potential for employee exposure to lead*. Therefore, Postal Service policy is as follows:

1. Prohibit activities or tasks that OSHA has identified as potentially hazardous.
2. Require that lead be identified:
   a. Before performing activities that might disturb it.
   b. If a health hazard is suspected.

3. Require OSHA Written Programs for Lead to:
   a. Comply with applicable OSHA regulations.
   b. Deal with the potential for human exposure to or environmental releases of lead (e.g., the presence, amount of, and potential for, LBP or LCM dust or fume releases (aerosolization).

Requirement for an OSHA Written Program for Lead

What Triggers the Requirement for an OSHA Written Program for Lead?

A facility is required to have an OSHA Written Program for Lead, if LBP or LCM is present in a form that may trigger OSHA or other requirements. The presence of LBP or LCM in such a form is determined by an inspection, a TLT, or the presumption of lead (e.g., paint applied before 1978). See Identifying the Presence of Lead and Lead Hazards on page 11 for a discussion of whether to conduct an inspection or a TLT.

What Comprises a Written Program?

A written program must include the program elements appropriate to control the potential for aerosolization of LBP and LCM and minimize the exposure of employees and customers. (For additional information, see the Safety Web site described in Resources on page 22.)

Lead Program Template

There is no "one size fits all" template for an OSHA Written Program for Lead. Responsible personnel must customize the template for a written lead program to address the conditions at their own facility. The Safety Resources Lead Page provides a sample template.

The table below provides examples of types of facilities, risk for exposure or release, and the program elements required in the written lead management program.

Facility Description	Risk for Exposure or Release	Program Elements (examples)
Office with LBP in good condition on doors and windows	Minimal	• Employee hazard communication (HazCom). • TLT. • Maintenance Work Practices. • Disposal activities that comply with applicable regulations.
Lobby with trace Lead in retail finishes or signage	Insignificant	• Disposal activities that comply with applicable regulations.
Historic building with extensive LBP in deteriorating condition	• Moderate employee exposure • Significant release potential	• Inspection. • HazCom. • Work Practices in accordance with historic requirements. • Risk assessment and abatement. • Disposal activities that comply with applicable regulations.
Network Distribution Center with LBP on structural steel	Moderate to significant	• Inspection or TLT. • Maintenance Work Practices. • O&M program. • Disposal activities that comply with applicable regulations.

Facility Description	Risk for Exposure or Release	Program Elements (examples)
Vehicle Maintenance Facility with yellow paint (e.g. handrails, safety striping, bollards, etc.)	Minimal	• HazCom. • Procedures to prevent disturbance. • Disposal activities that comply with applicable regulations.

Roles and Responsibilities

Headquarters

This person or organization...	Is responsible for...
Chief Human Resources Officer, Human Resources (HR)	• Communicating safety and health policies, including those pertaining to lead hazard management.
Vice President, Employee Resource Management , HR	• Establishing strategic direction and overseeing the Postal Service's safety and health program, including lead hazard management. • Coordinating with Maintenance Technical Support, and other Headquarters functional organizations to establish the Postal Service's Lead hazard management policy.

This person or organization...	Is responsible for...
Manager, Safety and OSHA Compliance Programs (SOCP), ERM, HR	• Assisting other Headquarters functional organizations to prepare technical aspects of policies, publications, and procedures that relate to OSHA, EPA, and state compliance and employee safety and health issues. • Maintaining liaison with OSHA on national lead issues.
Chief Sustainability Officer, Office of Sustainability, Deputy Postmaster General	• Developing, supporting, and overseeing the Postal Service's environmental compliance management program, including the national hazardous waste management program. • Developing policies and procedures that support the national hazardous waste management program. • Establishing national policies and procedures to comply with applicable environmental regulations. • Assisting other Headquarters functional organizations to establish policy, publications, and procedures to integrate lead control into Postal Service operations related to environmental compliance. • Maintaining liaison with EPA and state agencies on environmental compliance issues.

This person or organization...	Is responsible for...
Vice President, Facilities	• Establishing policies and procedures for real estate, design, construction, repair, and alteration actions under Facilities control so that the same follow the Postal Service's lead hazard policy.
Manager, Maintenance Operations, Operations	• Developing national maintenance policies and procedures for maintenance employees working with LBP and LCM. • Establishing maintenance procedures to keep LBP and LCM in good condition. • Coordinating with SOCP and NCED to establish LBP and LCM maintenance-related training, such as training for competent persons.
Managers of Planning, Implementation, Leasing, Real Estate & Assets, and Repair and Alterations, Facilities	• Taking into account the presence of LBP and other LCM (such as soils) in management of property and buildings, including management of new space acquisitions, out-leases, subleases, transfer of real property, renovation, alteration, construction, and demolition.

Federal Historic Preservation Officer, Facilities	• Consult with Cultural Management Resources Plan for planning and approval of LBP abatement activities that involve potentially historic buildings and their components.

This person or organization...	Is responsible for...
Other Headquarters Functional Organizations, e.g. Supply Management, Retail and Customer Service Operations , Fleet Management	• Implementing policies and procedures that include lead hazard management, when applicable.
Other Headquarters field units	• Following policies and establishing processes as needed so that projects or other activities under their control do not violate applicable OSHA or environmental regulations or Postal Service policy regarding lead hazard management.
General Counsel, Law Department	• Conducting legal research, monitoring laws and regulations, and issuing opinions and interpretations of environmental and safety laws and Postal Service policies related to lead in response to specific questions and issues.

Areas

This person or organization...	Is responsible for...
Vice Presidents, Area Operations	• Exercising overall responsibility for compliance with safety and health and environmental regulations, including lead hazard management.

Managers, Safety (Area), HR	• Evaluating area-wide and district lead hazard management activities and processes that may affect employees and other building occupants.
	• Advising management and providing technical assistance on management of lead hazards.
	• Maintaining liaison with local, federal, and state OSHA officials on compliance issues.
	• Coordinating with the:
	  • District Safety staff on hazard communication when LBP inspections or risk assessments are conducted.
	  • Manager, Maintenance Operations (Area), Operations Support, concerning area and district maintenance processes for lead hazard management.

This person or organization...	Is responsible for...
Managers, Maintenance Operations (Area) , Operations Support	• Assisting field maintenance organizations to fulfill their responsibilities for lead hazard management. • Training maintenance supervisors as competent persons. • Compliance with other processes established by Maintenance Policies and Programs.
Regional Environmental Compliance staff, Sustainability	• Coordinate and liaison communications with environmental regulatory agencies. • Provide guidance and support to district management and others to ensure that managers follow federal, state, and local environmental regulations, including requirements for hazardous waste.
Safety Specialists, Safety, HR	• Providing guidance and support to district management and others for compliance with applicable federal, state, and local safety regulations. • Coordinating lead inspections and risk assessments using inspectors or risk assessors qualified in accordance with 40 CFR 745. • Coordinating with Facilities, maintenance, on conduct of lead inspections, TLTs, risk assessments, and abatements as necessary or as requested by management.

This person or organization...	Is responsible for...
Safety Specialists, Safety, HR (Cont'd.)	• Coordinating with competent persons on procedures for lead determinations to address lead exposures of employees or customers during nonroutine maintenance. • Interacting with Facilities, the Facilities Response Line, district and plant safety staff, and others to monitor conduct of abatement projects in accordance with 40 CFR 745.227 and applicable state regulations, as necessary.
Other Area Managers	• Establishing procedures for compliance with applicable OSHA regulations, environmental regulations, or Postal Service policy regarding lead hazard management.

Districts

This person or organization...	Is responsible for...
District and Plant Managers	• Exercising overall responsibility for employee safety and health and for compliance with environmental, health and safety regulations, including lead hazard management, in facilities under their control.
District Safety Managers, Safety Specialists, Medical Personnel and others with Safety Duties	• Routine inspection, evaluation, and observation, to advise management on proper lead hazard control for compliance with applicable OSHA regulations. • Providing for employee lead air monitoring, medical evaluations, or surveillance as necessary. • Coordinating with Facilities and Area Safety Managers as necessary on risk assessments, control measures, and abatements. • Assisting management to provide employees and other building occupants with lead hazard communication as required.

This person or organization...	Is responsible for...
Installation Heads, Middle Level Managers, and Supervisors	• Managing lead hazard management and regulatory compliance. - Preparation of written program for lead, if required. • Confirming that maintenance, renovation, construction, and other activities and tasks do not present a lead hazard. • Having a competent person oversee work involving LBP. • Requesting lead inspections or TLTs as necessary before work. • Using Postal Service-approved work practices. • Supplying personal protective equipment and other lead-control equipment and providing instruction in its use. • Consulting with Maintenance, Safety, Environmental, Facilities, and Training staff for assistance.

Resources

This is a guide to resources and reference materials, especially those online, mentioned in this MI.

Federal Government

Code of Federal Regulations

The Code of Federal Regulations (CFR) can be searched online at: https://www.ecfr.gov.

CFR citations in the MI include:

- 29 CFR 1910.1025, Lead (general industry standard).
- 29 CFR 1926.62, Lead (construction industry standard).
- 40 CFR 261.24, Toxicity characteristics.
- 40 CFR 745, Lead-based Paint poisoning prevention in certain residential structures.

Occupational Safety and Health Administration

OSHA's website is found at: http://www.osha.gov/.
Under the "regulation" tab you can find the 29 CFR series, and specifically regulations and standards on lead.

Environmental Protection Agency

EPA's Website is found at: http://www.epa.gov/. Under "Quick Finder," you can click "Clean Air Act" and "Lead" to get detailed information about those topics.

Department of Housing and Urban Development

HUD's Office of Lead Hazard Control and Healthy Homes (OLHCHH) website can be found at:
https://www.hud.gov/program_offices/healthy_homes.

Postal Service

Safety Resources

The Safety Resources page on the Postal Service Intranet is your portal to information and tools for safety management. Go to http://blue.usps.gov. In the left column, under "Essential Links," and click on Safety Resources. Here you can find the *Lead Hazard Management Program Guide,* which is available by clicking on the A-Z index, scrolling down to the letter "L," and clicking on "Lead."

Safety Toolkit

The *Safety Toolkit* is an online, interactive management tool for safety personnel, who use the toolkit to record and track facility inspections, Program Evaluation Guide inspections, and OSHA citations. To reach the Toolkit from the Safety Resources page, click on *Safety Toolkit* found in the left column. To use the Safety Toolkit you must set up an account with a password. Instructions can be found on the Safety Resources Home Page at http://safetytoolkit.usps.gov:12/. Click on "STK User Guide".

Maintenance Technical Support Center

The Maintenance Technical Support Center (MTSC) provides information to Postal Service field technicians. The Maintenance Management Order (MMO) for Lead Work Practices can be found on the MTSC Website here:
http://www.mtsc.usps.gov/pdf/mmo/2009/mmo11509.pdf.

PolicyNet

Additional publications related to the handling of LBP and LCM are available online at the *PolicyNet* website:

- Handbook EL-800, *Managing Contract Safety and Health Compliance*.

Other

Lead-Based Paint: Operations & Maintenance Work Practices Manual for Homes and Buildings, May 1995, a free download, is available from the National Institute of Building Sciences. Go to: https://www.wbdg.org/ffc/nibs.

Attachment 1
Regulatory Requirements

Occupational Safety and Health Administration

General Industry Standard (29 CFR 1910.1025)

Under this standard, occupational exposures to lead are regulated for people other than those who work in construction and agricultural operations. This standard:

1. Establishes an airborne exposure limit of 50 micrograms per cubic meter (50 $\mu g/m^3$) as an 8-hour, time-weighted average.
2. Requires semiannual monitoring of blood lead level (BLL) for workers exposed to airborne Lead at or above an AL of 30 $\mu g/m^3$ and medical removal of workers with elevated BLL.
3. Provides salary retention for medically removed workers.
4. Requires control measures, such as the use of personal protective equipment, hygiene facilities, and medical surveillance measures.

A key provision that triggers the application of this standard is an employer's Initial Exposure Determination that an employee is overexposed (29 CFR 1910.1025(d)(2)).

Construction Industry Standard (29 CFR 1926.62)

Under this standard, occupational exposures to lead in construction activities, such as removing lead-based paint, are regulated. The standard requires the employer to:

1. Assess whether employees are exposed to lead at or above an AL.
2. Employ suitable compliance measures, such as engineering and work practice controls, and establish an administrative program, training, respiratory protection, hygiene facilities, and medical surveillance.

Lead-related operations may include activities such as demolition of structures, manual scraping and sanding, use of heat guns, and power tool cleaning with dust collection systems (including needle guns). Also addressed are abrasive blasting, welding, cutting, and torch burning.

Under the standard, a Negative Initial Determination can be made to lower the level of protective measures. The NID is similar to a Negative Exposure Assessment for asbestos.

Environmental Protection Agency

Under EPA regulations, a waste is considered hazardous if it has a concentration of 5.0 milligrams or more lead per liter when tested by the toxicity characteristic leaching procedure (40 CFR 261.24).

Resource Conservation and Recovery Act

Under the Resource Conservation and Recovery Act (RCRA), waste material from LBP and LCM abatement projects may have to be disposed of as hazardous waste. Examples of such waste include paint chemically stripped from components, spent media from vacuum blasting operations, small painted components, cleanup debris (plastic barriers, protective clothing, etc.), and contaminated soils.

RCRA establishes procedures for:

1. Identifying the generator of lead hazardous waste.
2. Preparing a hazardous waste manifest that must be used with attendant reporting procedures.
3. Engaging a licensed hazardous waste transporter to haul the waste.
4. Sending the waste to a permitted treatment, storage, or disposal facility.

Attachment 2

OSHA-Defined Tasks Requiring Interim Employee Protection (29 CFR 1926.62)

	Description	Tasks
Group 1	Tasks in this group are presumed to create exposures up to 10 times the permissible exposure limit (PEL) where lead-based paint (LBP) or other lead-containing material (LCM) is present.	1. Dry manual demolition of structures (e.g. dry wall). 2. Dry manual scraping. 3. Dry manual sanding. 4. Heat gun applications. 5. Power tool with dust collection systems.
Group 2	Tasks in this group are presumed to create exposures 10 to 50 times the PEL where LBP or LCM are present.	1. Using lead-containing mortar. 2. Lead burning. 3. Rivet busting. 4. Power tool cleaning without dust collection systems. 5. Cleanup activities where dry expendable abrasives are used. 6. Abrasive blasting enclosure.
Group 3	Tasks in this group are presumed to create exposures more than 50 times the PEL where LBP or LCM are present.	1. Abrasive blasting. 2. Welding on steel structures. 3. Cutting on steel structures. 4. Torch burning (gas welder) on steel structures.

Attachment 3
Definitions

Abatement. Any measure or set of measures designed to permanently eliminate lead-based paint hazards (see 40 CFR 745.223).

Action level (AL). Employee exposure, without regard to the use of respirators, to an airborne concentration of lead of 30 micrograms per cubic meter of air (30 µg/m3) calculated as an 8-hour, Time-weighted Average.

Competent person. One who is capable of identifying existing and predictable lead hazards in the surroundings or working conditions and who has authorization to take prompt corrective measures to eliminate them (29 CFR 1926.62).

Construction work. Work for construction, alteration, and/or repair, including minor renovation work (e.g. painting or decorating). It includes but is not limited to the following:

- Demolition or salvage of structures where lead or material containing lead is present.
- Removal or encapsulation of material containing lead.
- New construction, alteration, repair, or renovation of structures, substrates, or portions thereof that contain material containing lead.
- Installation of products containing lead.
- Lead contamination/emergency cleanup.
- Transportation, disposal, storage, or containment of lead or material containing lead at locations where construction activities are performed, and maintenance operations associated with the construction activities described in this paragraph.

Construction work does not include routine cleaning and repainting, such as minor surface preparation and repainting of offices, where there is insignificant damage, wear, or corrosion of existing Lead-containing paint and coatings or substrates.

Hazardous waste. Waste that can pose a hazard, or a potential hazard, to human health or the environment when managed improperly. RCRA regulations characterize a waste as hazardous if it possesses a hazardous waste characteristic (ignitability, corrosivity, reactivity, or toxicity) or if EPA specifically lists it as a hazardous waste. LBP and debris containing LBP could be considered hazardous.

Initial exposure determination. The process of monitoring employee lead exposures, using any information, observations, or calculations that indicate employee exposure to lead; any previous measurements of airborne lead; or any employee complaints. Previous measurements made within 12 months may be used if applicable. Previous results demonstrating that a particular product or activity cannot result in employee exposure above the AL can be used.

Inspection. A surface-by-surface investigation of the building interior and exterior to determine the presence of LBP or LCM, and report that describes the findings of that investigation. An inspection applies to all or a significant portion of a building. Inspections must be conducted in accordance with 40 CFR 745.

Lead. Metallic lead, all inorganic lead compounds, and organic lead soaps (the lead salt of an organic acid, the latter usually being a fatty acid). Excluded from this definition are all other organic lead compounds.

Lead-based paint (LBP). Paint or other surface coatings (such as varnishes and lacquers for example on wood floors) that contain lead. 40 CFR 745 further defines LBP as paint that contains Lead equal to or in excess of 1.0 milligrams per square centimeter, or more than 0.5 percent by weight. OSHA has no minimum amount or concentration of lead that triggers a determination that lead is present. Individual states may also have published LBP definitions that may be applicable.

Lead-containing material (LCM). Any material that contains lead, such as solder, lead-contaminated dust or soil, spent bullets, Lead weights, and even some paints not considered LBP.

Negative Initial Determination (NID). A documented (in writing) determination by a competent person that no employees are exposed to Lead at or above the AL. The determination is made using the methods prescribed in the standard, including the use of objective data.

Permissible exposure limit (PEL). Lead at concentrations greater than 50 micrograms per cubic meter of air (50 µg/m3) averaged over an 8-hour period (TWA).

Risk assessment. An on-site investigation to determine the existence, nature, severity, and location of LBP hazards, and the provision of a report by the individual or the firm conducting the Risk Assessment, explaining the results of the investigation and options for reducing LBP hazards. Until 40 CFR 745.228–233 is promulgated, Risk Assessment in the context of the postal workplace addresses the potential for occupational exposure, transport of Lead contamination to the employee's home, and environmental releases.

Targeted lead test (TLT). A test of all layers of paints and coatings that may be disturbed for the presence of LBP or other LCM before performing a specific task, such as spot welding a guard rail. Paint chip analysis or other OSHA-approved test methods must be used.

Time-weighted average (TWA). A formula used to compute the cumulative lead exposure for an 8-hour work.

Attachment 4
Acronyms

AAS	Atomic absorption spectrometry
AL	Action level
BLL	Blood lead level
CFR	Code of Federal Regulations
EPA	Environmental Protection Agency
ERM	Employee Resource Management
HazCom	Hazard communication
HR	Human Resources
HUD	Department of Housing and Urban Development
LBP	Lead-based paint
LCM	Lead-containing material
MI	Management Instruction
MMO	Maintenance Management Order
NID	Negative Initial Determination
O&M	Operations and Maintenance
OSHA	Occupational Safety and Health Administration
PEL	Permissible exposure limit
RCRA	Resource Conservation and Recovery Act
SOCP	Safety & OSHA Compliance Programs
TLT	Targeted lead test
XRF	X-ray florescence