



Environmental
Health & Safety

Lead Compliance Plan

Initiator: Adam Lucas

Revised by: Adam Lucas

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1. Program Description

The purpose of this program is to establish specific plan to minimize occupational exposure to lead and management of construction activities involving lead. Proper lead management will safeguard the health and safety of workers and building occupants, minimize the impact to the environment, and ensure adherence to the various regulatory issues concerning lead in the work environment.

2. Scope

This program applies to all occupational exposures to inorganic lead for affected UCR employees and contractors during construction work activities in which lead- containing materials are present in the work environment. Construction related activities where a worker may encounter and or/work with lead include: a) new construction; b) demolition or salvage of structures; c) removal or encapsulation of lead containing materials; d) alteration, repairs, and/or renovation of structures; e) installation of products containing lead; f) emergency clean-up; g) storage of lead containing materials at the work site; and h) maintenance operations.

Currently, UCR personnel are not trained or authorized to perform Lead Related Construction Work Activities, as described in California Department of Public Health (CDPH) Title 17, at or above the Cal-OSHA Action Level Limit. However, personnel engaged to perform O&M procedures and work practices are required to follow the elements of this section, as applicable, in addition to all applicable federal, state, and local regulations, standards, and codes governing lead management.

3. Definitions

Abatement Project Notification Form: Electronic form located on the UCR EH&S website that is to be completed and submitted to EH&S prior to performing any Lead Related Work Activity on the UCR campus or UCR satellite locations. This form can be found at the following link: <https://ehs.ucr.edu/safety>

Action Level(AL): Cal-OSHA limit for employee exposure to airborne lead at an 8-hour time- weighted average concentration of 30 micrograms of lead per cubic meter ($\mu\text{g}/\text{m}^3$) of air or 0.030 milligrams per cubic meter (mg/m^3) of air, without regard to the use of respirators.

Lead Abatement: Any set of measures designed to reduce or eliminate lead hazards or lead-based paint from residential or public buildings. Abatement does not include containment or cleaning activities.

Lead Hazard: Deteriorated lead-based paint, lead contaminated dust, lead contaminated soil, disturbing lead-based paint or presumed lead-based paint without containment, or any other nuisance which may result in persistent and quantifiable lead exposure.

Lead Hazard Evaluation: An on-site inspection, risk assessment and/or clearance inspection, done for pay or other compensation, to determine the presence or amount of lead-based paint or lead hazards in a residential or public building. Does not include personal air monitoring activities done to ensure Cal/OSHA compliance, representative sampling of components removed from a building to determine the applicability of hazardous waste requirements, or sampling done to determine adequacy of containment. Lead Hazard Evaluations are only to be performed by CDPH Certified Lead Inspector/Risk Assessors.

Lead Inspector/Risk Assessor: An individual who holds a CDPH certification to conduct Lead Hazard Evaluations. This includes on-site inspection, risk assessment and/or clearance inspections in order to assess lead hazards.

Lead Related Construction Work: Any construction, alteration, painting, demolition, salvage, renovation, repair, or maintenance of any residential or public building, including preparation and cleanup, that, by using or disturbing lead containing material or soil, may result in significant exposure of adults or children to lead and has been shown to expose employees to lead at or above the permissible exposure limit. As used in the definition of lead related construction work, “public building” means a structure which is generally accessible to the public, including but not limited to, schools, daycare centers, museums, airports, hospitals, stores, convention centers, government facilities, office buildings and any other building which is not an industrial building or a residential building. Any employee performing *Lead Related Construction Work* must be CDPH certified as a “Lead Worker” or “Lead Supervisor”.

Lead Related Work Activity: Any activity that disturbs lead containing materials, such as lead based paints, varnishes, glazing, soil, and lead sheeting. This includes, but is not limited to, the removal, renovation, restoration, maintenance, construction, salvage, clean-up, repair, and stabilization of lead containing materials. For the purpose of this compliance plan, *Lead Related Work Activity* refers to any activity where lead containing materials may be present or disturbed but does not pose a significant health risk and does not generate lead exposures in excess of the Cal-OSHA Action Level.

Lead Supervisor: An individual who holds a CDPH certification to perform Lead Abatement and Lead Related Construction Work Activities.

Lead Worker: An individual who holds a CDPH certification to oversee Lead Related Construction Work, prepare lead abatement plans, and perform Lead Abatement and Lead Related Construction Work Activities.

Permissible Exposure Level (PEL): The Cal-OSHA 8-hour time weighted average concentration of airborne lead the employee may be exposed to without regard to the use of respirators. This value is 50 µg/m³ of lead in air or 0.050 mg/m³ of lead in air.

Pre-Renovation/Demolition Hazardous Materials Building Survey Request Form: Electronic form located on the UCR EH&S website that is to be completed and submitted to EH&S prior to performing any construction, demolition or renovation activities on the UCR campus or UCR satellite locations. This form can be found at the following link: <https://ehs.ucr.edu/safety>

Presumed Lead Based Paint: Paint or surface coating affixed to a component in or on a structure constructed prior to January 1, 1978. "Presumed lead-based paint" does not include paint or surface coating that has been tested and found to contain an amount of lead less than one milligram per square centimeter (1.0 mg/cm²) or less than half of one percent (0.5%) by weight.

Project Monitor: An individual who holds a CDPH certification to prepare lead abatement plans, oversee Lead Related Construction Work to ensure that specifications are followed, and perform lead clearance inspections.

Objective Data: Information from manufacturers or laboratory data that demonstrates that the use of a material in a specific operation or activity will not result in exposure to lead at the AL.

Regulated Area: Work areas where airborne exposure to lead is above the PEL, or anticipated to be above the PEL.

4. Responsibilities

4.1 Environmental Health and Safety (EH&S):

- Oversee or approve project-specific lead management plans for Lead related Work Activities.
- Inspect Lead Related Work Activities involving potential lead exposure
- Perform or oversee all Lead Hazard Evaluations.
- Submit or oversee submittal of Lead Hazard Evaluation form 8552 to CDPH upon completion of Lead Hazard Evaluation
- Monitor Airborne lead exposures

- Provide regulatory guidance on all Lead Related Work Activities.
- Maintaining the documented inventory of lead-containing materials and their locations.
- Manage and respond to *Pre-Renovation/Demolition Hazardous Materials Building Survey Request* form submittals.
- Manage and respond to *Abatement Project Notification* form submittals.
- Select, approve, and manage list of Certified Lead Inspector/Risk Assessor and Project Monitor vendors with UCR service agreements
- Develop/approve the scope for all sampling protocols related to lead inspections and Lead Related Work Activities.
- Provide Lead Training
- Facilitate notification of exposure monitoring results and other reporting requirements to affected UCR personnel.

4.2 Facilities Services:

- Advance partnering with the EH&S on all Lead Related Work Activities, construction, demolition, renovation, maintenance, or repair work (see EH&S Lead Notification Flow Charts for FS below).
- Complete and submit the *Pre-Renovation/Demolition Hazardous Materials Building Survey Request* form no less than 25 working days prior to starting any planned construction, demolition or renovation activities (see EH&S Lead Notification Flow Chart for FS During Planned Renovation, Demolition, Abatement and Routine/Scheduled Maintenance Operations, below).
- Complete and submit the *Abatement Project Notification* form no less than 15 working days prior to starting any planned Lead Related Work Activities (see EH&S Lead Notification Flow Charts for FS During Planned Renovation, Demolition, Abatement and Routine/Scheduled Maintenance Operations, below).
- Inform the EH&S when damage to lead materials (such as lead based paint) is observed or when debris needs to be cleaned up.
- Control access to regulated areas as necessary
- Ensure that all EH&S approved work practices established for each specific job are adhered to.
- Ensure EH&S is involved with the planning, scheduling, and oversight of all Lead Related Work Activities.

- Ensure that EH&S is involved with conducting personal exposure monitoring for all Lead Related Work Activities in order to provide negative exposure assessments and validate compliance with Action Levels (AL) and Permissible Exposure Limits (PEL).
- Ensure that all employees who are involved in construction, alteration, painting, demolition, salvage, renovation, repair, or maintenance activities participate in Annual Lead Awareness Training, provided by EH&S.
- Do not allow any UCR employee to participate in Lead Related Construction Work or Lead Abatement, as described above, unless they are CDPH certified “Lead Workers” or “Lead Supervisors”.

4.2 Planning Design & Construction (PD&C):

- Advance partnering with the EH&S on all Lead Related Work Activities, construction, demolition, renovation, maintenance, or repair work (see EH&S Lead Notification Flow Chart for PD&C below).
- Complete and submit the *Pre-Renovation/Demolition Hazardous Materials Building Survey Request* form no less than 25 working days prior to starting any planned construction, demolition or renovation activities (see EH&S Lead Notification Flow Chart for PD&C below).
- Complete and submit the *Abatement Project Notification* form no less than 15 working days prior to starting any planned Lead Related Work Activities (see EH&S ACM Notification Flow Chart for FS During Planned Renovation, Demolition or Abatement Projects, below).
- Inform the EH&S when damage to lead materials (such as lead based paint) is observed or when debris needs to be cleaned up.
- Control access to regulated areas as necessary
- Ensure that all EH&S approved work practices established for each specific job are adhered to.
- Ensure EH&S is involved with the planning, scheduling, and oversight of all Lead Related Work Activities.
- Ensure that all employees who are involved in construction, alteration, painting, demolition, salvage, renovation, repair, or maintenance activities participate in Annual Lead Awareness Training, provided by EH&S.

4.4 Employee/Worker involved in Lead Related Work Activity:

- Participate in Annual Lead Awareness Training, provided by EH&S

- Possess basic knowledge of the hazards associated with lead
- Do not perform *Lead Related Construction Work Activities*, as described above, unless CDPH certified as a “Lead Worker” or “Lead Supervisor”.
- Wear proper PPE that is assigned
- Follow good personal hygiene practices
- Adhere to all work practices established for each specific job

4.4 Contractors:

- Follow by all UCR Environmental Health and Safety Departments established guidelines.
- All contractors hired to perform Lead Related Construction Work Activities or Lead Abatement for UCR must be CDPH Certified Lead Professionals.
- Must submit form CDPH 8551 (Abatement of Lead Hazards Notification) to CDPH no less than 5 days prior to starting Lead Related Construction Work Activities or Lead Abatement activities for UCR
- Must submit Lead Work Pre-Job Notification to Cal-OSHA no less than 5 days prior to starting Lead Related Construction Work Activities or Lead Abatement activities for UCR.
- Submit copies of CDPH 8551 and Lead Work Pre-Job Notification forms to EH&S prior to starting Lead Related Construction Work Activities or Lead Abatement activities.

5. Program Components

5.1 EXPOSURE ASSESSMENT

5.1.1 LEAD IDENTIFICATION FROM BULK SAMPLES OR XRF ANALYSIS

1. Suspect lead-containing materials must be evaluated prior to the start of work. Lead analysis must be performed for each unique surface to be disturbed under the direct supervision of EH&S.
2. Lead Hazard Evaluations, to include on-site inspection, risk assessment and/or clearance inspections, must be performed by CDPH Certified Lead Inspector/Risk Assessors.
3. Form 8552 must be submitted to CDPH immediately following any Lead Hazard Evaluations performed at UCR.

4. All Lead Hazard Evaluations shall be done in compliance with the sampling guidelines outlined in the Residential Lead-Based Paint Hazard Reduction Act of 1992; Title X, Section 101
5. All samples shall be submitted to AIHA and ELLAP accredited lead laboratories for analysis.

5.1.2 EXPOSURE MONITORING

- 1) Air monitoring is conducted under the direction of the UCR Senior Industrial Hygienist.
- 2) Air samples shall be collected in the breathing zone of employees where there is potential exposure to lead. Sampling shall be conducted in accordance with NIOSH Method 7082.
- 3) Where a determination has been made that lead containing surfaces or materials may be present at the work site, air monitoring shall be conducted periodically during construction activities that are representative of the exposure for each job classification at the work site to represent the initial exposure assessment.

5.1.3 DETERMINATION OF SURFACE CONTAMINATION LEVELS

To minimize the risk of contamination in eating areas, and the workplace in general, housekeeping measures (HEPA vacuums, wet mopping, etc., as outlined below), shall be implemented in accordance with Cal-OSHA Title 8, Section 1532.1 to contain lead dust during any activity involving the disturbance of lead containing materials. To verify the effectiveness of housekeeping efforts, the presence of lead contamination on surfaces shall be conducted using NIOSH 9100 methods in compliance with the sampling guidelines outlined in the Residential Lead-Based Paint Hazard Reduction Act of 1992; Title X, Section 101. All surface and clearance wipe sampling is conducted under the direction of the UCR Senior Industrial Hygienist.

5.2 CONTROL MEASURES

5.2.1 PERSONAL PROTECTIVE EQUIPMENT

- 1) Personal Protective Equipment must be worn at all times where there may be potential exposure to lead containing materials including the initial exposure assessment phase. The minimum level of personal

protective equipment shall be specified by the UCR Senior Industrial Hygienist.

- 2) The appropriate respiratory protection for each Lead Related Work Activity must be worn in accordance with Cal-OSHA Title 8, Section 1532.1.
- 3) Respirators must be worn:
 - a) As an interim protection for tasks until exposure assessments can be completed.
 - b) When an employee's exposure exceeds the Permissible Exposure Limit (PEL).
 - c) Whenever an employee requests for a respirator.
 - d) In work situations where engineering and work practice controls are not sufficient to reduce employee exposures below the PEL.
- 4) Coveralls contaminated with lead must not be worn outside of the regulated area.
- 5) Gloves should be worn if they do not interfere with the work being performed.
- 6) Eye protection meeting the ANSI Z87.1 standard must be worn during construction activities.

5.2.2 ENGINEERING AND WORK PRACTICE CONTROLS

- 1) Provide HEPA filtered local exhaust ventilation for devices or abrasive power tools, needle guns sanders, grinders, and other equipment that will be used to disturb lead containing surfaces.
- 2) Use HEPA vacuums for clean-up. Do not dry sweep or use compressed air.
- 3) Use wet methods to reduce airborne dust generation, e.g., a water sprayer to hold down settled leaded dust on the plastic sheeting covering the floor.
- 4) Wet surfaces with water prior to scraping, sweeping, or sawing.
- 5) Daily clean-up of work area and equipment to prevent leaded dust accumulations.
- 6) No eating, drinking, smoking, or applying cosmetics where lead containing surfaces are being disturbed.
- 7) Shoveling, wet sweeping, brushing may only be used for clean-up to pick-up large debris. The debris should be misted with water prior to clean up to minimize leaded dust generation.

- 8) All surfaces must be kept as free as practicable from lead accumulations.
- 9) Possession or storage or consumption of foods, beverages, chewing gum, tobacco products, and cosmetic products is prohibited in the work area.
- 10) A Regulated Area shall be established around the work location. In the absence of project-specific exposure data, the Regulated Area shall be configured to include all areas within a 25-foot radius of these activities performed on structures with lead-containing coatings. The Regulated Areas shall be identified with warning signs posted at all approaches to the area such that personnel may read the signs and take necessary protective steps before entering the area marked by the signs. The signs shall read as follows:

DANGER
LEAD WORK AREA
MAY DAMAGE FERTILITY OR THE UNBORN CHILD
CAUSES DAMAGE TO THE CENTRAL NERVOUS SYSTEM
DO NOT EAT, DRINK OR SMOKE IN THIS AREA

- 11) A change area shall be established at the boundary of the Regulated Area for the purpose of entry and exit from the Regulated Area for any purpose except emergencies.
- 12) Employees entering the Regulated Area will be provided respiratory protection in accordance with UCR Senior Industrial Hygienist guidance and the requirements outlined in Cal-OSHA Title-8, Section 1532.1.
- 13) Employees entering the Regulated Area will be provided with protective work clothing that prevents contamination of the employee's garments. This protective clothing shall be provided in a clean and dry condition at least weekly. Protective clothing shall include, as a minimum:
 - a. Coverall or similar full-body work clothing
 - b. Gloves
 - c. Eye protection
- 14) Employees exiting the Regulated Area for any purpose shall decontaminate their protective clothing by the following methods:
 - a. Removal of outer protective clothing
 - b. Use of a HEPA-filtered vacuum

- 15) Provisions shall be made in the change area for the collection of contaminated items such as work clothing, respirator cartridges, and equipment.
- 16) Provisions will be made for employees to wash their hands and face at the completion of the activity and/or before departing from work at the end of the shift. Also, provisions will be made to allow employees to wash their hands and face prior to eating, drinking, smoking, or applying cosmetics.
- 17) Shower facilities should be provided when deemed appropriate by the UCR Senior Industrial Hygienist. This decision shall be made upon consideration of project duration and location, climate, and availability of acceptable water supply.

5.3 MEDICAL SURVEILLANCE

5.3.1 INITIAL MEDICAL SURVEILLANCE

Employees exposed on any day to airborne lead concentrations at or above 30 µg /m³ will have the opportunity to receive an initial baseline blood lead level (BLL) examination. This examination shall include the BLL and the zinc protoporphyrin level. Medical examinations and information provided to examining and consulting physicians shall be in accordance with Cal/OSHA Title 8, Section 1532.1 and under the direction of an Occupational Physician designated by UCR EH&S. The following information shall be provided to the consulting physicians:

- a) Copy of Cal/OSHA's Lead in Construction Standard, Title 8 Section 1532.1, including all Appendices.
- b) Description of the affected employee's duties as they relate to the employee's exposure.
- c) Employee's exposure level or anticipated exposure level to lead and to any other toxic substance (if applicable).
- d) Description of any personal protective equipment used or to be used.
- e) Prior blood lead determinations.
- f) All prior written medical opinions concerning the employee in the employer's possession or control.

5.3.2 MEDICAL CONSULTATION

Medical consultation will be made available at least annually to any employee under the following situations:

- a) The employee has a confirmed BLL of 40 µg /dL or higher within the preceding 12 months.
- b) The employee exhibits signs or symptoms commonly associated with lead intoxication.
- c) The employee desires medical advice concerning the effects of current or past exposure to lead on the employee's ability to procreate a healthy child.

5.3.3 MULTIPLE PHYSICIAN REVIEW

UCR will select the physician to conduct the initial medical examination, as listed under Title 8, Section 1532.1. The employee has the right to designate a second physician to review initial examination results after notification to the UCR Risk Management Office, and have a second examination conducted only after the initial medical examination has been completed. In the event the two physicians differ in their findings, a third party physician will be agreed on by the two physicians to resolve prior disagreements.

5.3.4 MEDICAL REMOVAL PROTECTION

Medical removal protection (MRP) involves the temporary removal of an employee from a worksite, due to elevated blood lead levels, to a place of significantly lower exposure without loss of earnings or seniority or other employment rights or benefits.

An employee is included in the MRP when:

- (a) Worker's periodic and follow-up BLL are equal to 50 micrograms per deciliter (µg/dL). The employee can return to the worksite when two consecutive BLL are less than 40 (µg/dL).
- (b) A final medical determination indicates a medical condition that places the employee at "increased risk of material impairment to health" due to lead exposure.

An employee removed as a result of the physician's recommendation may be returned to former job status when the physician indicates it is safe to do so.

5.4 RECORDKEEPING

Accurate records will be established and maintained for the following subjects. The record retention period will be in accordance with UCR record retention guidelines.

Affected employees, former employees, and their designated representatives can obtain access to the records mentioned above by providing a written request to the Environmental Health and Safety Office.

1) EXPOSURE ASSESSMENT

All employee monitoring data will be retained for the period of employment plus 30 years. Exposure monitoring records shall include:

- a) Date(s), number, duration, location and results of each of the samples taken if any, including a description of the sampling procedure used to determine representative employee exposure where applicable
- b) Description of the sampling and analytical methods used and evidence of their accuracy
- c) Type of respiratory protective devices worn, if any
- d) Name, social security number, and job classification of employee monitored and all other employees whose exposure the measurement is intended to represent
- e) Environmental variables that could affect the measurement of employee exposure

2) MEDICAL SURVEILLANCE

Records will be maintained for employees subject to medical surveillance. Records will include at a minimum:

- Employee name
- Social security number
- Job description/duties
- Air monitoring data pertinent to the employee
- Any employee medical complaints
- Medical examination results including medical/work history
- Biological monitoring
- Any information or guidelines used to interpret laboratory tests.

Medical records appropriate to this section will be retained for a period of employment plus 30 years.

3) MEDICAL REMOVAL

Records will be maintained for employees removed from current job status due to elevated BLLs. Records will include at a minimum: employee name; social security number; date of removal and return to job status; explanation

of how the removal was accomplished; and reason for removal. Records will be retained for a least the duration of the employee's employment.

4) TRAINING

EH&S Office will maintain training records on each employee trained under this Lead Compliance Program. Records will include: date of training; employee name; and a description or outline of training content.

5.5 ENVIRONMENTAL MANAGEMENT

Environmental management (i.e., waste characterization, waste disposal) will be conducted under the direction of the Hazardous Waste Section of Environmental Health and Safety.

6. Reporting Requirements

All work shall be performed in strict accordance with all applicable federal, state, and local regulations, standards, and codes governing lead, and any other trade work done in conjunction with the disturbance of lead. The lead contractor generally makes notification to regulatory agencies. The UCR Senior Industrial Hygienist facilitates notification to affected UCR personnel.

The most recent editions of any relevant regulation, standard, document, or code shall be in effect. Where conflict among the requirements or with these specifications exists, the most stringent requirements shall apply.

Any work involving disturbance of lead shall comply with the requirements of the California General Industry Safety and Health Standards, and the Safety and Health Regulations for Construction, Title 8, California Code of Regulations (CCR), including, but not limited to the following sections:

Section 5144:	Respiratory Protection
Section 2405.4:	Electrical
Section 1637, 1640, 1658:	Scaffolding
Section 1513:	Housekeeping
Section 5194:	Hazard Communication
Section 1675:	Ladders
Section 3215 and 3220:	Egress and EP's

Section 1514:	PPE
Section 1519 & 3360:	Sanitation
Section 1684, 3555, and 3556:	Powered Hand Tools
Section 1502:	Contractor Responsibilities
Section 1511:	General Safety and Health Provisions
Section 1510	Safety Training
Section 1527 and 3366:	Washing Facilities
Section 1528:	Gases, Vapors, Fumes, Dusts, Mists
Section 1531 and 5143:	Ventilation
Section 3203:	IIPP
Section 3204:	Access to Employee's Exposure and Medical Records
Section 6003:	Accident Prevention Signs
Section 3221:	Fire Prevention Plan
Section 1532.1:	Construction Safety Orders, Lead

Any work involving disturbance of lead shall comply with the Federal Environmental Protection Regulations pertaining to the handling and disposal of lead-containing materials, as well as the State of California and any local government agencies which have delegated responsibility for the administration and enforcement of federal regulations.

22 CCR, Section 66261
10 CFR, Part 261

All Employees and Contractors shall comply with all requirements of the EPA-approved landfill that is selected as the disposal site.

All Employees and Contractors shall comply with California Title 17, Section 8.

7. Competency Assessment and Training Requirements

Employee General Lead Awareness Training

For each employee in a work environment where lead-containing materials are present, training will be conducted initially upon job assignment and annually thereafter. This training shall go over, at minimum:

- The content of the Cal-OSHA Lead standard (Title 8 – 1532.1)
- Relevant information from applicable Safety Data Sheets (SDS)
- Overview of the hazards of lead
- Warning signs/labels
- The purpose of medical surveillance programs
- The contents of this compliance plan

Lead Worker Training

In addition to general awareness training, each worker exposed to an airborne concentration of lead above the action level of 30 µg /m³ shall receive, at least annually, information concerning:

- The specific nature of the operations which have potential to result in exposure to lead above the action level
- The purpose, proper selection, fitting, use, and limitations of respirators
- Engineering controls and work practices associated with Lead Related Work Activities
- Information regarding Medical surveillance/removal program
- Risks involved with chelation

- Employees' rights to records, such as medical/exposure records/training materials

Respiratory Protection Training

All UCR employees required to use a respirator must participate in the UCR Respiratory Protection Program.

8. Information and External References

8.1 Recordkeeping will be conducted in compliance with the following Lead Regulations

Title 8 CCR 1532.1;
Title 29 CFR 1910.1025;
Title 29 CFR 1926.62
40 CFR part 745 (I), (B),
Title 17 CCR Division 1 Chapter 8 Lead-Based Paint and Lead Hazards

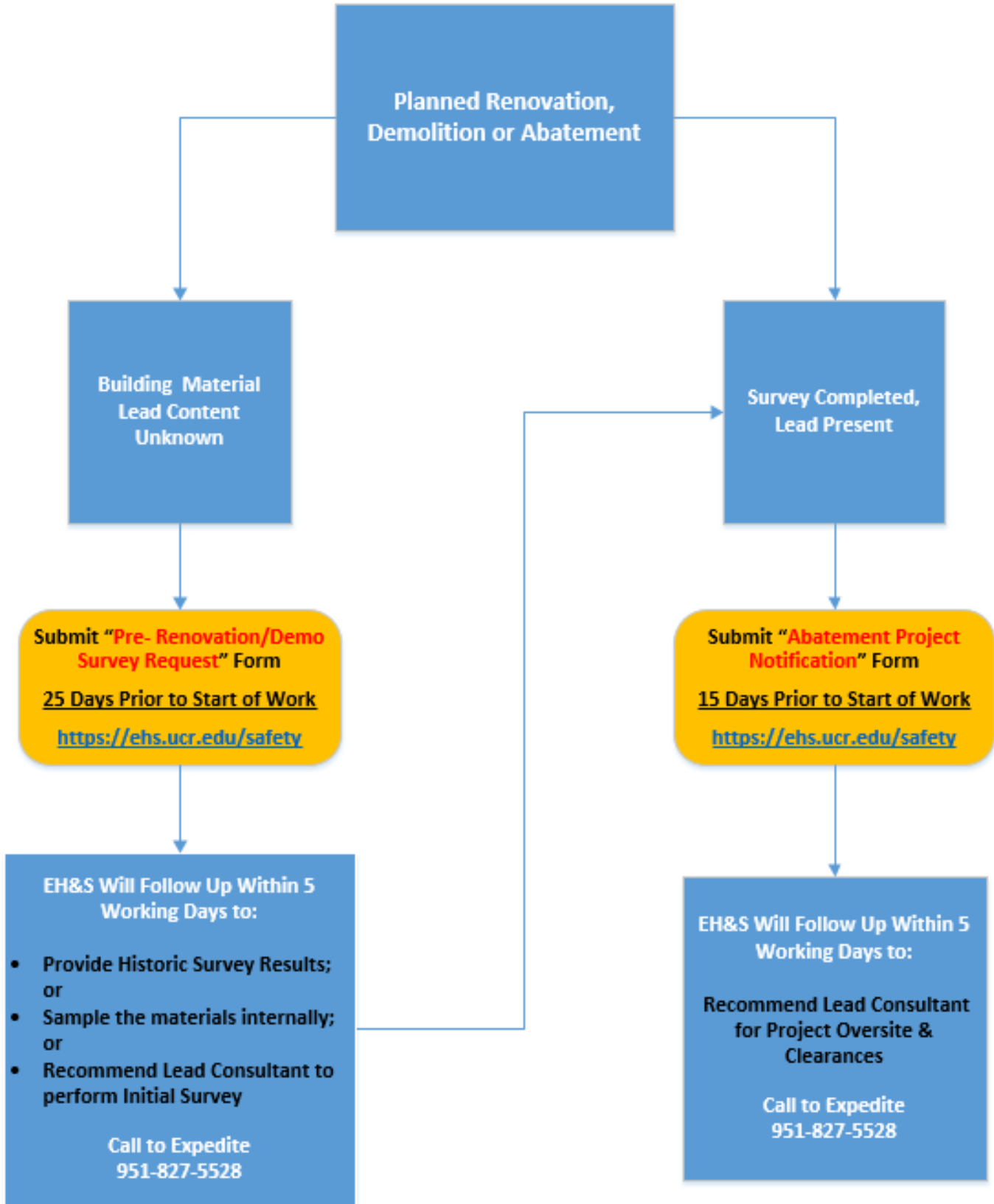
The original of all documents pertaining to this Lead Compliance Plan will be kept on file at EH&S. The standard documents to be kept on file will be:

Survey Reports & Lab Analysis

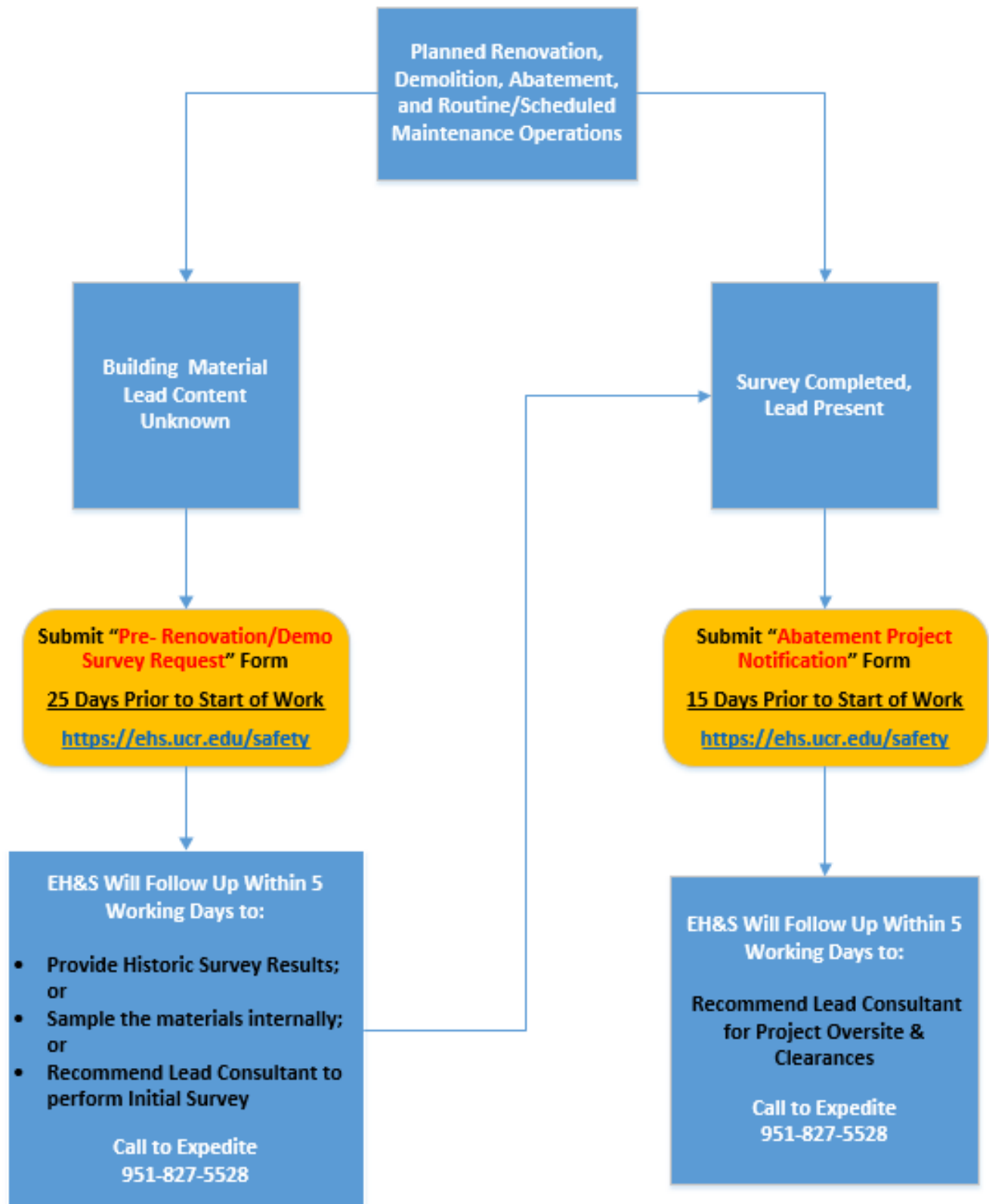
Records of Areas Abated

Disposal Records

EH&S Lead Notification Process for Project Design and Construction



EH&S Lead Notification Process for Facilities Services During Planned Renovation, Demolition, Abatement, and Routine/Scheduled Maintenance Operations



EH&S Lead Notification Process for Facilities Services During **Emergencies** and **Expedited Repairs**

