

LEAD IN PAINT WORK PLAN

PART 1 – GENERAL

1.1 PROJECT SITE

- A. The project site is Terra Linda High School (TLHS) located at 320 Nova Albion Way, San Rafael, California. The property owner (Owner) is San Rafael City Schools (SRCS).

1.2 SCOPE OF WORK

- A. Contractor will furnish all labor, materials, equipment, services, insurance, employee training, fit test, medical examinations, transportation and all other items of expense necessary for the removal or disturbance of paint containing lead in conjunction with the exterior repainting project scheduled to be conducted at Terra Linda High School. Locations and descriptions of paint containing lead are detailed in NorBay Consulting's report entitled "*Lead Inspection Results, Repainting Project (Exteriors), Terra Linda High School dated April 12, 2021*".
- B. Only persons trained, knowledgeable and certified in the techniques of lead disturbance/remediation, waste handling, disposal and subsequent cleaning of lead-contaminated areas will be utilized in this project. Since detectable levels of lead are present on various building components throughout the site, any contractor involved with the project must be familiar with and abide by the Cal/OSHA Lead in Construction Standard (CCR, Title 8, Section 1532.1).
- C. The Work includes the following:
 - 1. Disturbance of either damaged or intact lead in paint in conjunction with the exterior repainting project.
 - 2. Contractor must conduct Occupational Safety & Health Administration (OSHA) required personal air sampling throughout the project.
- D. Prior to commencement of work, Contractor must inspect areas and conditions affecting the work. These include, but are not limited to, physical conditions at the site which may bear upon site access, handling and storage of tools and materials, access to water, electric or other utilities or any other conditions which may affect performance of required activities. Any failure by Contractor to acquaint himself with available information will not relieve him from the responsibility for estimating properly the difficulty or cost of successfully performing the work.

1.3 RESPONSIBILITIES OF OWNER

- A. Owner shall provide existing water, at no cost to Contractor.
- B. Owner shall provide existing electrical power, at no cost to Contractor.

1.4 REQUIRED LICENSURE

- A. Contractor and/or employees must be registered/trained for lead-related work by the State of California Department of Public Health (CDPH).
- B. Subcontractors must hold all licenses applicable to specified trade work.

1.5 PERMITS

- A. Contractor must obtain all required permits, licenses, registrations, notifications and regulatory approvals as required by federal, state and local law.

1.6 NOTIFICATIONS

- A. Contractor must make all required written notifications to regulatory agencies, including the following:
 - 1. California Occupational Safety and Health Administration (Cal/OSHA).

1.7 RULES AND REGULATIONS

- A. Contractor will comply with the most recent edition of applicable federal, state and local laws, codes and regulations.
- B. The list of regulators and regulations as cited in this section are intended to serve as a reference for the most commonly used standards governing the lead industry.
 - 1. American National Standards Institute (ANSI) publications:
 - Z87.1-79 – Occupational and Educational Eye and Face Protection.
 - Z88.2-80 – Practices for Respiratory Protection.
 - Z89.1-81 – Requirements for Protective Headgear for Workers.
 - Z41-83 – Personal Protection: Protective Footwear.
 - Z88.6-84 – Respiratory Protection: Respiratory Use Qualifications
 - 2. Code of Federal Regulations (CFR):
 - 29 CFR 1926, Section 61 – Lead in Construction Standard.
 - 3. California Code of Regulations (CCR):
 - Title 8, Section 1532.1 – Lead in Construction Standard.
 - 4. California Department of Public Health (CDPH):
 - Title 17, Division 1, Chapter – Lead

1.8 PROJECT SCHEDULE

- A. SRCS (Owner) or their representative will determine work hours.

1.9 PROCEDURES

- A. Contractor Responsibility: Contractor assumes full responsibility and liability for compliance with all applicable federal, state, and local regulations pertaining to work practices and protection of workers, visitors to the site and persons occupying areas adjacent to the site. Contractor is responsible for providing training and medical examinations and for maintaining training/medical records of personnel as required by the applicable federal, state, and local regulations.

1.10 SUBMITTALS

- A. PRIOR to commencement of work, Contractor must submit to Owner, and/or the project environmental consultant, documentation (two copies) FOR APPROVAL that includes, without limitation, the following:
 - 1. Copies of licenses and registrations required, including subcontractor's licenses (if applicable).
 - 2. Copies of written notification to the following regulatory agencies:
 - a. California Division of Occupational Safety and Health (Cal/OSHA).
 - 3. Documentation that employees performing removal, disposal, and air sampling operations have received proper training.
 - 4. Documentation from a Physician that all employees or agents who may be exposed to lead dust have received medical surveillance to determine whether they are physically capable of working while wearing the respirator required without suffering adverse health effects.
 - 5. Documentation from a Physician that all employees or agents who may be exposed to lead dust have received a comprehensive medical examination.
 - 6. Documentation of respirator fit testing for all employees or agents who must enter the work area. This fit testing must be in accordance with qualitative procedures as required by OSHA regulations and conducted at least annually.
 - 7. An emergency contact list including the name, office phone number and cell phone number for Contractor's supervisor, who can be reached on a twenty-four hour basis.
 - 8. A SITE SPECIFIC work plan detailing methods to be utilized and measures to prevent the release of lead dust.
 - 9. Copies of Contractor's written respiratory protection program and medical

surveillance program.

10. On company letterhead, confirmation that Contractor has written safety programs for Injury/Illness Prevention, Hazard Communication and Fall Protection.
11. When/if rental equipment is to be used in removal areas or to transport waste materials, a copy of the written notification provided to the rental company informing them of the use of the rental equipment. The rental company must sign this notification.

1.11 NOTICES

- A. Post a list containing names and telephone numbers for Owner's contact, Contractor's contact and the project environmental consultant, this information to be available prior to the beginning of the job.
- B. Additional postings must include visitor entry and exit log, employee daily sign-in log, entry and exit procedures, emergency procedures and other postings as required by the Department of Labor.

1.12 SITE USE AND SECURITY

- A. Confine operations at the site to the areas permitted. Portions of the site beyond areas in which work is indicated are not to be disturbed.
- B. The work area(s) will be restricted to authorized, trained and protected personnel, including Contractor's employees or agents, Owner's employees, project environmental consultant and state and local inspectors.
- C. Entry into the work area(s) by unauthorized individuals must be reported immediately to the Owner and/or the project environmental consultant.
- D. Contractor is responsible for project site security during disturbance/remediation operations to protect work efforts and equipment. Contractor must remove and clean areas prior to leaving the site each day. Contractor is responsible for any containment or equipment left beyond the scheduled shift.
- E. Contractor is responsible for safe storage of all lead waste materials until Contractor legally disposes of the materials off of Owner's property. Hazardous waste materials will be kept in a secure locked area at all times and must be removed from the work area(s) on a daily basis.
- F. Keep areas such as walkways and non-construction areas free from the accumulation of waste, rubbish and/or construction debris.

1.13 EMERGENCY PLANNING

- A. Contractor, prior to remediation initiation, must develop emergency planning and

procedures.

- B. Emergency procedures must be in written form and prominently posted in English and Spanish. Contractor must ensure that all persons entering the work area read these procedures and understand the project site layout and emergency procedures.
- C. Emergency planning must include considerations of fire, explosion, electrical hazards, slips, trips and falls and heat-related injury. Written procedures must be developed, and Contractor must provide employee-training procedures.
- D. Employees must be trained in evacuation procedures in the event of workplace emergencies:
 - 1. For non-life-threatening situations, employees injured or otherwise incapacitated will decontaminate following normal procedures, with assistance from fellow workers if necessary, before exiting the workplace to obtain proper medical treatment.
 - 2. For life-threatening injury or illness, worker stabilization and removal from the workplace to secure medical treatment will take priority over decontamination.
 - 3. Telephone numbers of all emergency response personnel must be prominently posted.

PART 2 – PRODUCTS

2.1 EQUIPMENT

- A. General:
 - 1. Contractor will furnish respirators to workers. The respirators must have been tested and approved by the National Institute of Occupational Safety and Health (NIOSH) for use in lead dust atmospheres.
 - 2. Contractor will provide full body disposable protective clothing, including head, body, and foot coverings to all workers and visitors working in and/or inspecting the work area where exposure to lead dust may exist, in sizes adequate to accommodate movement without tearing.
 - 3. Additional safety equipment (e.g., hard hats meeting the requirements of ANSI Standard Z89.1-1981, eye protection meeting the requirements of ANSI Standard Z87.1-1979, safety shoes meeting the requirements of ANSI Standard Z41.1-1967 and disposable gloves), as necessary, must be furnished to all workers and authorized visitors.
 - 4. Tools and equipment must arrive at the project site free of debris and dust or other contaminants. HEPA vacuum exteriors must be clean with all openings on the vacuum or hose taped closed until ready for operation.

PART 3 – EXECUTION

3.1 SAFETY

- A. Contractor is responsible for conditions of the project site, including the safety of all persons and property during the performance of the work. To ensure effective communication in safety matters, Contractor must participate and conduct the following meetings:
1. On the first day of lead disturbance/remediation activities, Contractor must conduct a safety (tailgate) meeting for its employees, which will alert them to the potential hazards of the project. Contractor must conduct the meeting in the primary language of the employees present. If necessary, more than one primary language presentation may be needed.
 2. Contractor will then conduct safety (tailgate) meetings on a weekly basis.

3.2 CONTRACTOR PROVIDED WORK SITE PREPARATION

- A. All lead workers must be provided with the following:
1. A clean changing area.
 2. Shower facilities or washbasins equipped with soap, water and towels.
 3. Proper respiratory protection.
 4. Proper techniques in decontamination and personal hygiene requirements.
 5. Training on the health hazards of lead dust exposure, including inhalation and ingestion of lead dust.

3.3 LEAD IN PAINT

1. Various building components throughout the on-site structures have been found to contain lead, thus making the disturbance of these components subject to Cal/OSHA regulations, specifically Title 8, Section 1532.1.
2. Disturbance/remediation of building materials with lead-based or lead-containing paints should be conducted with the materials kept in a wetted state and removed in sections, as feasible, to reduce the potential for airborne lead emissions.
3. Each lead related waste produced must be placed in properly segregated, labeled and sealed impervious containers.
4. Each category of waste will be tested and characterized by the contractor using one or more of the following testing protocols.
 - A. Total Threshold Limit Concentration (TTLC)
 - B. Soluble Threshold Limit Concentration (STLC)
 - C. Toxicity Characteristic Leaching Procedure (TCLP)

3.4 INSPECTIONS

- A. The project environmental consultant may perform the following inspections.
 - 1. Visual inspections of the work areas prior to beginning disturbance/remediation activities; inspections of Contractor's engineering controls; final visual inspections of the work areas.
 - 2. Contractor will be allowed to remove their engineering controls only after a successful visual inspection.

3.5 OSHA PERSONNEL AIR MONITORING

- A. Air monitoring required by OSHA for lead exposure is performed by Contractor.
 - 1. At a minimum, Contractor will conduct breathing zone personal air monitoring of each job task. Breathing zone will be considered an area within a hemisphere, forward of the shoulders, with a radius of 6 to 9 inches and the center at the nose or mouth of the employee.
 - 2. Monitoring must be conducted by a qualified professional experienced and knowledgeable about the methods of air monitoring.