

Lead Based Paint Operations and Maintenance Plan

2012 - 2013


Carle Place Union Free School District

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Thomas G. Szajkowski
Director of Facilities & Operations

Interoffice Memorandum

To: David J. Flatley, Superintendent of Schools

From: Thomas G. Szajkowski 

Date: June 4, 2012

RE: **EPA Lead Renovators Certification Rule**

Mr. Flatley,

Beginning in April 2010, contractors performing renovation, repair and painting projects that disturb lead-based paint in target housing and child-occupied facilities built before 1978 must be certified and must follow specific work practices to prevent lead contamination. A child-occupied facility is a building that regularly houses children under the age of 6 years. The rule requires the renovation company to be certified and the work must be directed by a trained contractor. Workers must receive on-the-job training in lead safe practices. The rule also requires pre-renovation education, posting of warning signs, containment of the work area, waste management, cleaning and post-renovation cleaning verification. Minor repair and maintenance that will disturb less than 6 sq ft per room interior or 20 sq ft exterior, excluding window replacement are exempt from this rule. The contractor must provide the owner of the building with the EPA pamphlet titled, "Renovating Right" no more than 60 days prior to the renovation. During the renovation the contractor must post informational signs describing the general nature and locations of the renovation and the anticipated completion date.

The NYSED has for some time had regulations for the safe handling of lead in public schools. Those regulations require the testing of surfaces to be disturbed during renovation, safe handling of lead containing materials and clearance testing in accordance with the United States Department of Housing and Urban Development (HUD) Guidelines. This new rule only applies to buildings or portions of buildings, built before 1978, that house Pre-K, Kindergarten or 1st Grade, including those common areas routinely used by children under 6 such as corridors, toilet rooms, gyms, and cafeterias.

The safe handling practices in the EPA Rule and the HUD Guidelines are identical, but the new EPA Rule allows for visual clearance using the post-renovation cleaning verification they developed. The HUD clearance standards adopted by SED are more restrictive than the EPA visual clearance, and therefore SED will continue to follow HUD requirements. Simple visual clearance will not be accepted for this purpose.

To be proactive to the above regulations, the District had Cherry Lane Elementary (K-2) tested to identify and report on the condition of any lead that may exist. Since safety is paramount to our students and staff of all ages, it was decided to include all the buildings of instruction for identification purposes of lead district wide. Each room/location was categorized in the same manor as utilized in the Asbestos Management Plan (AMP) for ease of cross-reference for any future work, or crisis management evaluation.

At this time, the Carle Place Union Free School District is fully compliant within the parameters of the SED, and, the reports are available for review in the Facilities Office. It is recommended; if warranted by the Office of the Superintendent; that the Lead Based Paint Operations & Maintenance Plan be adopted by the Board of Education.

Keeping in compliance with 40 CFR Part 745 Subpart E, notification should be posted annually in the school calendar or on the District website that a Lead Management Plan exists, and is available for review by contacting the Office of the Director of Facilities and Operations.

Sincerely,

A handwritten signature in black ink, appearing to read 'T. Szajkowski', with a stylized, flowing script.

Thomas G. Szajkowski

Introduction

This Lead Based Paint Operations & Management Plan (O&M Plan) was prepared in an attempt to comply with the requirements of the United States Environmental Protection Agency's (EPA) regulation 40 CFR Part 745 Subpart E: Lead; Renovation, Repair, and Painting Program; Lead Hazard Information Pamphlet; Notice of Availability; Final Rule dated April 22, 2008 (RRP Rule). Due to the nature of this regulation, interpretations of compliance may vary from governmental agency to governmental agency, as well as from individual inspector to individual inspector. For this reason this document and its compliance with this law can not be considered ALL-INCLUSIVE, that is it can be expected that deviations may be found by the EPA or other governmental agencies during their review of this program.

This O&M Plan should be considered applicable for only the regulated areas indicated in Section 2 of this report. These regulated areas consist of only the areas identified by the school district as satisfying the definition of a child occupied facility in accordance with the RRP Rule. That is a school building, or portion of a building, constructed prior to 1978, visited regularly by the same child, 6 years of age or under, on at least two different days within any week (Sunday through Saturday period), provided that each day's visit lasts at least 3 hours and the combined weekly visit lasts at least 6 hours, and the combined annual visits last at least 60 hours.

It is recommended that a copy of this O&M Plan be maintained at the district's administration office and within the custodial office of each of the applicable school buildings. Every attempt should be made by the school district to keep this plan current with ongoing operations and maintenance, reinspections and response actions.

Section 1.0

General Information Pertaining to EPA's RRP Rule

EPA's RRP Rule requires any contractors performing renovations, repair and painting projects (for compensation) that disturb lead based paint in target housing and child-occupied facilities built before 1978 must be certified and must follow specific work practices to prevent lead contamination. This requirement is inclusive of all outside contractors and the district's custodial and maintenance staff.

A child-occupied facility means a building, or portion of a building, constructed prior to 1978, visited regularly by the same child, under 6 years of age, on at least two different days within any week (Sunday through Saturday period), provided that each day's visit lasts at least 3 hours and the combined weekly visits last at least 6 hours, and the combined annual visits last at least 60 hours. Child-occupied facilities may include, but are not limited to, day care centers, preschools and kindergarten classrooms. Child-occupied facilities may be located in target housing or in public or commercial buildings.

With respect to common areas in public or commercial buildings that contain child-occupied facilities, the child-occupied facility encompasses only those common areas that are routinely used by children under age 6, such as restrooms and cafeterias. Common areas that children under age 6 only pass through, such as hallways, stairways, and garages are not included. In addition, with respect to exteriors of public or commercial buildings that contain child-occupied facilities, the child-occupied facility encompasses only the exterior sides of the building that are immediately adjacent to the child-occupied facility or the common areas routinely used by children under age 6.

Compliance with the RRP Rule requires that the firm performing the renovations to ensure the following:

- Owners and occupants of target housing and child-occupied facilities receive information on lead-based paint hazards before these renovations begin; and
- Individuals performing renovations are properly trained; renovators and firms performing these renovations are certified; and proper work practices are followed during these renovations.

General Information Pertaining to this O&M Plan

This Lead Based Paint Operation and Maintenance Plan (O&M Plan) has been prepared to assist the school district in compliance with the United States Environmental Protection Agency's (EPA) regulation 40 CFR Part 745 Subpart E: Lead; Renovation, Repair, and Painting Program; Lead Hazard Information Pamphlet; Notice of Availability; Final Rule dated April 22, 2008 (RRP Rule).

This O&M Plan was not intended for the school district's compliance with New York State Education Departments requirements of 8 NYCRR 155.5 Commissioners Regulations for the Reduction of Lead Hazards in School, Uniform Safety for School Construction and Maintenance Projects, the United States Occupational Safety & Health Administration's regulations 29 CFR 1926 OSHA Lead in Construction, or any other lead regulations having jurisdiction over school buildings. Compliance with these standards are addressed by the school district in other forums.

This document is being on behalf of the school district by:

J C Broderick & Associates, Inc. (JCB)
1775 Expressway Drive North
Hauppauge, New York 11788
Phone 631.584-5492
Fax 631.584-3395
EPA Certification #: NY 2159-2

Wherever a conflict exists between this O&M Plan and any State or Federal regulation or District policy the most stringent interpretation shall be applied. Copies of this O&M Plan shall be maintained at the school district's Facilities Office and the head custodian's office in each applicable school building.

The following certified consultants assisted in the preparation of this O&M Plan. Copies of these consultants US EPA Lead Based Paint Professional certifications can be referenced as an attachment.

- | | | |
|---|-------------------|---------------|
| • | Brendan Broderick | Risk Assessor |
| • | Edward McGuire | Inspector |
| • | Mark Beekman | Inspector |
| • | John Back | Inspector |
| • | Rich Mondello | Inspector |

This O&M Plan has been prepared for only the following reported regulated areas of the school district:

Regulated Areas Within School District		
School Building	Specified Areas	Building Drawing
Carle Place High School	Entire Structure	#1, #2, #3
Rushmore Elementary School	Entire Structure	#4
Cherry Lane Elementary School	Entire Structure	#5

The building drawings can be referenced in Attachment No 1 for detailed information pertaining the name and address' of school buildings that have been identified by the school district as containing regulated areas.

General Information Regarding the Lead Based Paint Inspection

In an attempt to identify all the lead based painted surfaces and or other surface coatings that may contain lead equal to or in excess of 1.0 milligrams/per square centimeter (mg/cm^2) or 0.5% by weight within the regulated areas of the school district a lead based paint inspection was performed by an EPA Certified Lead Based Paint Inspector. The lead based paint inspection consisted of a site inspection which included the sampling of suspect lead containing materials utilizing XRF methodology.

The inspection and sampling was performed in accordance with The U.S. Department of Housing and Urban Development's (HUD) guidelines entitled, The Guidelines for the Evaluation and Control of Lead-based Paint and Environmental Protection Agency (EPA) Regulations in 40 CFR Part 745. HUD's standard indicates that paint with lead concentrations greater than 1.0 milligram per square centimeter (mg/cm^2) when tested by X-ray fluorescence (Section 302 of the Lead-Based Paint Poisoning Prevention Act), or by paint chip analysis with a confirmed 0.5% lead by weight when analyzed by a certified laboratory, must be treated as lead-based paint. There is no direct relationship between these two standards, they are separate and distinct, and are not health based.

The intent of this lead based paint inspection was to identify only the lead based painted surfaces and other surface coatings that exist in the regulated areas only. This survey was not intended to identify all lead based paint containing building components associated with the school buildings.

JCB identified and separated suspect lead containing building materials into testing combinations. These combinations consisted of individual components with apparent equal paint histories in each section equivalent. All components were analyzed by XRF. The inspection was conducted in accordance with The Department of Housing and Urban Development (HUD) Guidelines for the Evaluation and Control of Lead-Based Paint Hazards in Housing, 1997.

Some exceptions from HUD's guidelines were observed due to limited access. Only sampling of the surfaces observed by the inspector in plain view and accessible were performed. Sampling in restricted areas (such as locked areas, behind walls, obstructed views, elevated, and dangerous situations) were not included as part of this survey

The sampling and analysis reported herein was performed only in the spaces accessible at the time of the site visits. Therefore, suspect lead containing materials may exist in locations not available to JCB. Any building materials not specifically mentioned within this report shall be considered and handled as lead containing unless confirmed otherwise by appropriate analysis.

The results of the document review, inspection, sampling and analysis performed did identify various materials that are lead containing in the regulated areas in the school building. Any disturbance of these materials should be performed in accordance with the RRP Rule and all other applicable federal, state and local regulations.

Drawings for the school buildings that have been identified by the district as containing regulated areas can be referenced in Attachment No. 1. The drawings contain detailed information pertaining to the school building's names, addresses and their regulated areas.

The regulated areas that have been determined to contain lead containing components have been demarcated for easier reference. Also located in this attachment are XRF Positive Tables for each school building. These tables correspond with the building drawings and contain detailed information pertaining to the description and sampling results of the lead containing components. Complete sampling report for each regulated area can be referenced in Attachment No. 2.

Operations and Maintenance Plan Policies

This O&M Plan is set forth by the School District and is designed to protect the health and safety of all persons who may come into contact with Lead Based Paint and the occupants in the regulated areas of the school buildings and to comply with regulations set forth by the EPA's RRP Rule.

It is the district's policy that all planned renovation and or maintenance activities, including minor repairs and maintenance activities, are all to be performed by a certified outside firm/contractor. That is such activities will not be performed by district personnel. The work must be performed by the certified firm using certified renovators.

It is the school districts policy that all planned renovation and maintenance work, other than minor repairs and maintenance activities, that will disturb lead based paint in a regulated area must be performed by an outside contractor/firm. That is these activities will not be performed by district personnel and will be performed by certified firm using certified renovators.

Renovation means the modification of any existing structure, or portion thereof, that results in the disturbance of painted surfaces, unless that activity is performed as part of an abatement. The term renovation includes (but is not limited to):

- The removal, modification or repair of painted surfaces or painted components (e.g., modification of painted doors, surface restoration, window repair, surface preparation activity (such as sanding, scraping, or other such activities that may generate paint dust));
- The removal of building components (e.g., walls, ceilings, plumbing, windows); weatherization projects (e.g., cutting holes in painted surfaces to install blown-in insulation or to gain access to attics, planing thresholds to install weather-stripping), and interim controls that disturb painted surfaces.

A renovation performed for the purpose of converting a building, or part of a building, into target housing or a child-occupied facility is a renovation under this subpart. The term renovation does not include minor repair and maintenance activities.

Minor repair and maintenance activities are activities, including minor heating, ventilation or air conditioning work, electrical work, and plumbing, that disrupt 6 square feet or less of painted surface per room for interior activities or 20 square feet or less of painted surface for exterior activities where none of the work practices prohibited or restricted by §745.85(a)(3) are used and where the work does not involve window replacement or demolition of painted surface areas.

When removing painted components, or portions of painted components, the entire surface area removed is the amount of painted surface disturbed. Jobs, other than emergency renovations, performed in the same room within the same 30 days must be considered the same job for the purpose of determining whether the job is a minor repair and maintenance activity.

Participants in the O&M Program include the Program Administrator (PA), the school district's Consultant, and a licensed outside renovator firm/contractor. The following table highlights information relating to the above referenced program participants:

O&M Program Participants	
Program Administrator	
Consultant	J C Broderick & Associates, Inc. 1775 Expressway Drive North Hauppauge, New York 11788 631.584.5492 EPA Lead License #NY 2159 2
Contractor	United States Environmental Protection Agency Certified Renovator Firm To be awarded.

In the event of accidental damage to Lead Based Paint the following actions shall be taken immediately:

- Building staff shall notify the PA,
- The PA shall evaluate the incident and take precautionary measures including isolating the area by closing and locking doors, and the shutting down of the HVAC system,
- The PA shall notify the district's consultant who will perform an assessment and prepare an appropriate response action.

Emergency renovations are activities that were not planned but result from a sudden, unexpected event (such as non-routine failures of equipment) that, if not immediately attended to, presents a safety or public health hazard, or threatens equipment and/or property with significant damage. Interim controls performed in response to an elevated blood lead level in a resident child are also emergency renovations.

Emergency renovations are exempt from the information distribution (notifications), warning sign posting, containment, waste handling, training, and certification requirements to the extent necessary to respond to that immediate emergency. Emergency renovations are not exempt from the final cleaning requirements (which must be performed by certified renovators or trained individuals), the cleaning verification requirements (which must be performed by certified renovator), clearance wipe sampling (which must be performed by an independent industrial hygienist) and the record keeping requirements.

Information Distribution Requirements (Notification Policies)

The school district's policy is that all community notifications shall be performed in strict accordance with 40 CFR §745.84 (Information Distribution Requirements) and shall include, but is not limited to, the following:

No more than 60 days before beginning renovation activities in any regulated area of the school district that will result in the disturbance of a lead based paint containing component the firm performing the renovation is required to ensure that the information distribution requirements of the RRP Rule are satisfied.

This shall include, but is not limited to, the following:

- The firm shall provide the school district with the information pamphlet "Renovate Right: Important Lead Hazard Information for Families, Child Care Providers and Schools" (the pamphlet) and obtain, from a school district representative, a written acknowledgment that they have received the pamphlet; The written acknowledgment shall include a statement recording the representatives' name and an acknowledgment of their receipt of the pamphlet prior to the start of renovation. The statement shall include the address of the regulated area undergoing renovation, the signature of the representative and the date of signature.
- The firm, with the school district's assistance, shall provide the parents and guardians of children who occupy the regulated areas with the pamphlet, information describing the general nature and locations of the renovation and the anticipated completion date, and information on how interested parents or guardians of children can review a copy of the records or obtain a copy from the renovation firm at no cost to the occupants. Parent or guardian notifications can be performed by either:
 - 1) Mailing or hand-delivery of the pamphlet and the renovation information to each parent or guardian of the regulated space,or;
 - 2) While the renovation is ongoing, post informational signs describing the general nature and locations of the renovation and the anticipated completion date. These signs must be posted in areas where they can be seen by the parents or guardians of the children frequenting the child-occupied facility. The signs must be accompanied by a posted copy of the pamphlet or information on how interested parents or guardians of children frequenting the child-occupied facility can review a copy of the pamphlet or obtain a copy from the renovation firm at no cost to the parents or guardians. The signs must also include information on how interested parents or guardians of children frequenting the child-occupied facility can review a copy of the records or obtain a copy from the renovation firm at no cost to the parents or

guardians. The renovation firm must prepare, sign, and date a statement describing the steps performed to notify all parents and guardians of the intended renovation activities and to provide the pamphlet.

To assist in the community notification information pertaining to regulated activities will be posted on the District's website and or calender. A sample copy of the notification information can be referenced in Attachment No 7.

To ensure compliance with community notification requirements, a Certification of Information Distribution Requirements Form (reference Attachment No 7) will be executed for each regulated activity.

Renovation/Maintenance Work Practices

All renovation work that will disturb a lead containing component will be performed by an EPA Certified Firm and Renovator. All work employed by the certified firm during the renovation work must be performed in strict accordance with 40 CFR §745.85 (Work Practice Standards) and shall include, but is not limited to, the following:

- **Occupant Protection**

Firms must post signs clearly defining the work area and warning occupants and other persons not involved in renovation activities to remain outside of the work area. To the extent practicable, these signs must be in the primary language of the occupants. These signs must be posted before beginning the renovation and must remain in place and readable until the renovation and the post-renovation cleaning verification and clearance wipe sampling have been completed. If warning signs have been posted in accordance with 24 CFR 35.1345(b)(2) or 29 CFR 1926.62(m), additional signs are not required by this section.

- **Containing the Work Area**

Before beginning the renovation, the firm must isolate the work area so that no dust or debris leaves the work area while the renovation is being performed. In addition, the firm must maintain the integrity of the containment by ensuring that any plastic or other impermeable materials are not torn or displaced, and taking any other steps necessary to ensure that no dust or debris leaves the work area while the renovation is being performed. The firm must also ensure that containment is installed in such a manner that it does not interfere with occupant and worker egress in an emergency.

- **Interior Renovations**

The firm must remove all objects from the work area, including furniture, rugs, and window coverings, or cover them with plastic sheeting or other impermeable material with all seams and edges taped or otherwise sealed.

Close and cover all ducts opening in the work area with taped-down plastic sheeting or other impermeable material.

Close windows and doors in the work area. Doors must be covered with plastic sheeting or other impermeable material. Doors used as an entrance to the work area must be covered with plastic sheeting or other impermeable material in a manner that allows workers to pass through while confining dust and debris to the work area.

Cover the floor surface, including installed carpet, with taped-down plastic sheeting or other impermeable material in the work area six (6) feet beyond the perimeter of surfaces undergoing renovation or a sufficient distance to contain the dust, whichever is greater.

Use precautions to ensure that all personnel, tools, and other items, including the exteriors of containers of waste, are free of dust and debris before leaving the work area.

- Exterior Renovations

The firm must close all doors and windows within twenty (20) feet of the renovation. On multi-story buildings, close all doors and windows within twenty (20) feet of the renovation on the same floor as the renovation, and close all doors and windows on all floors below that are the same horizontal distance from the renovation.

Ensure that doors within the work area that will be used while the job is being performed are covered with plastic sheeting or other impermeable material in a manner that allows workers to pass through while confining dust and debris to the work area.

Cover the ground with plastic sheeting or other disposable impermeable material extending 10 feet beyond the perimeter of surfaces undergoing renovation or a sufficient distance to collect falling paint debris, whichever is greater, unless the property line prevents 10 feet of such ground covering.

In certain situations, the renovation firm must take extra precautions in containing the work area to ensure that dust and debris from the renovation does not contaminate other buildings or other areas of the property or migrate to adjacent properties.

- Prohibited and Restricted Practices

The work practices listed below shall be prohibited or restricted during a renovation as follows:

- Open-flame burning or torching of lead-based paint is prohibited.
- The use of machines that remove lead-based paint through high speed operation such as sanding, grinding, power planing, needle gun, abrasive blasting, or sandblasting, is prohibited unless such machines are used with HEPA exhaust control.
- Operating a heat gun on lead-based paint is permitted only at temperatures below 1100 ° Fahrenheit.
- Waste Handling

Waste from renovation activities must be contained to prevent releases of dust and debris before the waste is removed from the work area for storage or disposal. If a chute is used to remove waste from the work area, it must be covered.

At the conclusion of each work day and at the conclusion of the renovation, waste that has been collected from renovation activities must be stored under containment, in an enclosure, or behind a barrier that prevents release of dust and debris out of the work area and prevents access to dust and debris.

When the firm transports waste from renovation activities, the firm must contain the waste to prevent release of dust and debris.

- Cleaning

After the renovation has been completed, the firm must clean the work area until no dust, debris or residue remains.

- Interior and Exterior Renovations

The firm must collect all paint chips and debris and, without dispersing any of it, seal this material in a heavy-duty bag

Removal of the protective sheeting must consist of misting the sheeting before folding it, fold the dirty side inward, and either tape shut to seal or seal in heavy-duty bags. Sheeting used to isolate contaminated rooms from non-contaminated rooms must remain in place until after the cleaning and removal of other sheeting. Dispose of the sheeting as lead/lead contaminated waste.

- Additional Cleaning

The firm must clean all objects and surfaces in the work area and within two (2) feet of the work area in the following manner, cleaning from higher to lower.

Clean walls starting at the ceiling and working down to the floor by either vacuuming with a HEPA vacuum or wiping with a damp cloth.

Thoroughly vacuum all remaining surfaces and objects in the work area, including furniture and fixtures, with a HEPA vacuum. The HEPA vacuum must be equipped with a beater bar when vacuuming carpets and rugs.

Wipe all remaining surfaces and objects in the work area, except for carpeted or upholstered surfaces, with a damp cloth. Mop uncarpeted floors thoroughly, using a mopping method that keeps the wash water separate from the rinse water, such as the two (2) bucket mopping method, or using an alternative wet mopping system.

- Post-Renovation Cleaning Verification

Interiors

A certified renovator must perform a visual inspection with the aid of a EPA provided cleaning verification card to determine whether dust, debris or residue is still present. If dust, debris or residue is present, these conditions must be removed by re-cleaning and another visual inspection must be performed.

After a successful visual inspection, a certified renovator must:

Verify that each windowsill in the work area has been adequately cleaned, using the following procedure.

Wipe the windowsill with a wet disposable cleaning cloth that is damp to the touch. If the cloth matches or is lighter than the cleaning verification card, the windowsill has been adequately cleaned.

If the cloth does not match and is darker than the cleaning verification card, re-clean the windowsill then either use a new cloth or fold the used cloth in such a way that an unused surface is exposed, and wipe the surface again. If the cloth matches or is lighter than the cleaning verification card, that windowsill has been adequately cleaned.

If the cloth does not match and is darker than the cleaning verification card, wait for 1 hour or until the surface has dried completely, whichever is longer.

After waiting for the windowsill to dry, wipe the windowsill with a dry disposable cleaning cloth. After this wipe, the windowsill has been adequately cleaned.

Wipe uncarpeted floors and countertops within the work area with a wet disposable cleaning cloth. Floors must be wiped using an application device with a long handle and a head to which the cloth is attached. The cloth must remain damp at all times while it is being used to wipe the surface for post-renovation cleaning verification. If the surface within the work area is greater than 40 square feet, the surface within the work area must be divided into roughly equal sections that are each less than 40 square feet. Wipe each such section separately with a new wet disposable cleaning cloth. If the cloth used to wipe each section of the surface within the work area matches the cleaning verification card, the surface has been adequately cleaned.

If the cloth used to wipe a particular surface section does not match the cleaning verification card, re-clean that section of the surface then use a new wet disposable cleaning cloth to wipe that section again. If the cloth matches the cleaning verification card, that section of the surface has been adequately cleaned.

If the cloth used to wipe a particular surface section does not match the cleaning verification card after the surface has been re-cleaned, wait for one (1) 1 hour or until the entire surface within the work area has dried completely, whichever is longer.

After waiting for the entire surface within the work area to dry, wipe each section of the surface that has not yet achieved post-renovation cleaning verification with a dry disposable cleaning cloth. After this wipe, that section of the surface has been adequately cleaned.

When the work area passes the post-renovation cleaning verification, remove the warning signs.

Exteriors

A certified renovator must perform a visual inspection to determine whether dust, debris or residue is still present on surfaces in and below the work area, including windowsills and the ground. If dust, debris or residue is present, these conditions must be eliminated and another visual inspection must be performed. When the area passes the visual inspection, remove the warning signs.

Section No. 7
Mandatory Dust Clearance Testing

In addition to the Post-Renovation Cleaning Verification, which shall be performed by the certified renovation firm, work will only be considered satisfactorily complete after an independent industrial hygienist firm, which is an EPA Certified Abatement Firm retained by the school district, performs dust clearance sampling at the conclusion of a renovation. The dust clearance samples shall be collected by a certified inspector, risk assessor or dust sampling technician.

The renovation firm is required to re-clean the work area until the dust clearance sample results are below the established clearance standards.

Activities that do not disturb paint, such as applying paint to walls that have already been prepared, are not regulated by this O&M Plan if they are conducted after post-renovation cleaning verification and dust clearance sampling has been performed.

Section No 8
Record Keeping

The certified firm shall provide the school district with all required forms and certifications. The firm will maintain all records of the renovation activity in accordance with 40 CFR §745.86 (Record keeping and Reporting requirements) Firms performing renovations must retain and, if requested, make available to the EPA all records necessary to demonstrate compliance with the RRP Rule for a period of 3 years following completion of the renovation and shall include (as applicable):

- Records or reports certifying that a determination had been made of what lead-based paint components were and were not present and affected by the renovation;
- A copy of the firm certification and the renovator's training certificate;
- Records of notification activities performed;
- Documentation that a certified renovator was assigned to the project, that the certified renovator provided on-the-job training for workers used on the project (topics must be identified for each worker), that the certified renovator performed or directed workers who performed all of the tasks and that the certified renovator performed the post-renovation cleaning verification.
- Documentation of compliance with the required work practices. This shall include, at a minimum, completion and certification of the "Record Keeping Summary Sheet of Regulated Renovations" provided in Attachment No 5.
- Documentation of the clearance wipe sampling;
- If the renovation firm was unable to comply with all of the requirements of this rule due to an emergency the firm must document the nature of the emergency and the provisions of the rule that were not followed.

The certified firm shall provide all record keeping documents to the school district within 30 days of the completion of the renovation.

Section No 9
Program Training

It is the school district's policy that all head custodians and maintenance workers whom perform their duties within any school building that contains a regulated area will receive an initial lead based paint awareness training. The lead based paint awareness training will include, at a minimum, the following:

- A review of the RRP rule;
- A review of the pamphlet materials;
- A review of the defined regulated areas within their school building;
- A review of the lead based paint containing components within the regulated areas;
- A review of the district's operations & maintenance program.

Proof of such training shall include a copy of the course materials and a signature from the trained employee documenting the date of the training and that they received the course outlined material.

Section 10: Updates

The school district will perform an annual update of this lead based paint operations and maintenance program. The update will consist of the following:

- Perform a reinspection of all previously identified lead based paint containing components and update the O&M plan accordingly,
- Review of district school buildings' uses to confirm that the regulated areas depicted in this O&M Plan are accurate and up to date;
- Perform a lead based paint inspection of all newly added regulated areas and include findings within this O& Plan;
- Perform lead based paint awareness training to all new head custodians and maintenance workers;
- Review all regulated lead based paint renovation activities performed. Archive all required record keeping documents.

Notification of Lead Based Paint Renovation Activity

In accordance 40 CFR §745 this notification has been posted to advise the parents and guardians of children who occupy regulated areas of this school building that renovation work is being planned or is being performed that will disturb known lead based paint containing components. Work practices will be employed by a certified firm and renovator in accordance with 40 CFR §745.

BUILDING: _____

BUILDING AREA: _____

LEAD CONTAINING COMPONENT: _____

GENERAL DESCRIPTION OF WORK: _____

START DATE: _____

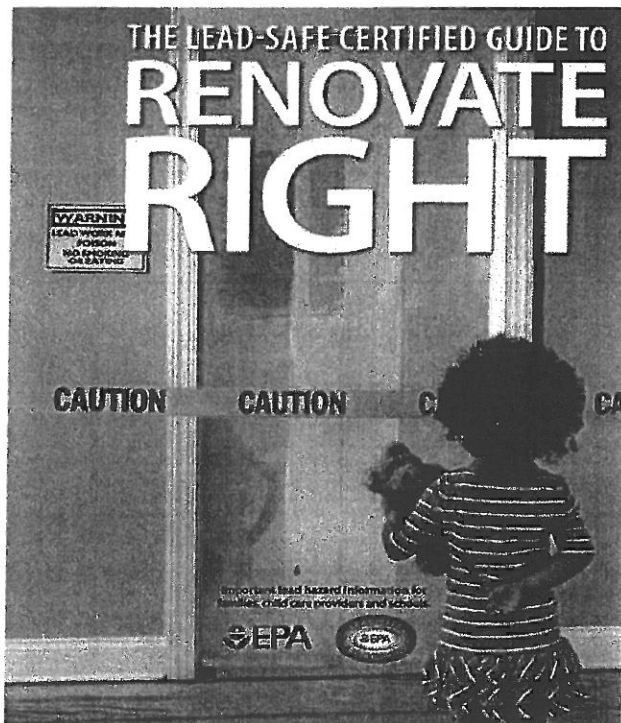
ANTICIPATED END DATE: _____

US EPA CERTIFIED RENOVATION FIRM: _____

US EPA CERTIFIED RENOVATOR: _____

INDEPENDENT INDUSTRIAL HYGIENIST: _____

PROGRAM ADMINISTRATOR: _____



Any Parents or Guardians or other interested parties who wish to obtain a copy of the United States Pamphlet The Lead-Safe Certified Guide to Renovate Right at no cost please contact the above referenced School District Program Administrator.

At the conclusion of the renovation work a complete project report will be prepared describing the work practices employed. Any Parents or Guardians or other interested parties who wish to obtain a copy of this report at no cost please contact the above referenced School District Program Administrator

Certification of Information Distribution Requirements Form

This sheet is intended to document and certify the procedures taken by the firm, and the school district, to satisfy the Information Distribution Requirements of 40 CFR § 745.84, no more than sixty (60) days before beginning of any regulated activity.

Regulated Activity Description

School Building Name: _____
Address: _____
Location of Work Area _____
Description of Work _____
Expected Dates of Work Start _____ Finish _____

Provide Owner of the Building with the Pamphlet

I, the following building owner representative, have received a copy of the EPA Pamphlet entitled The Lead-Safe Certified Guide to Renovate Right: Important Lead Hazard Information for Families, Child Care Providers and School for the following regulated activity:

Name of Owner Representative _____
Title of Owner Representative _____
Date _____

Provide Adult Occupant of the Building with the Pamphlet

I, the following adult building occupant representative, have received a copy of the EPA Pamphlet entitled The Lead-Safe Certified Guide to Renovate Right: Important Lead Hazard Information for

Name of Occupant Representative _____
Title of Occupant Representative _____
Date _____

Provide Notification to Parents and Guardians

I, the following authorized person, certify that posting of the form entitled Notification of Lead Based Paint Renovation Activity will or has been posted in area where it can be seen by parents or guardians of the children that frequent the child occupied facility.

Name of Authorized Person _____
Title of Authorized Person _____
Date _____

Website or Calender Publication

The School District has implemented a Lead Based Paint Operation and Maintenance Plan (O&M Plan) to ensure compliance with the United States Environmental Protection Agency's (EPA) regulation 40 CFR Part 745 Subpart E: Lead; Renovation, Repair, and Painting Program; Lead Hazard Information Pamphlet; Notice of Availability; Final Rule dated April 22, 2008 (RRP Rule). The O&M Plan includes identification of all *child-occupied facility* portions (regulated areas) of the school district. Testing has been performed in these regulated areas and all lead based paint containing building components have been identified and are maintained within the O&M Plan.

In compliance with 40 CFR Part 745 Subpart E, please regard this as notification that lead based paint containing components have been identified in regulated areas of the school district. These lead containing building components have been implemented in an Operations & Maintenance Plan.

It is the district's policy that all planned renovation and or maintenance activities, including minor repairs and maintenance activities, are all to be performed by a certified outside firm/contractor. That is such activities will not be performed by district personnel. The work must be performed by the certified firm using certified renovators.

It is the school districts policy that all planned renovation and maintenance work, other than minor repairs and maintenance activities, that will disturb lead based paint in a regulated area must be performed by an outside contractor/firm. That is these activities will not be performed by district personnel and will be performed by certified firm using certified renovators.

No more than 60 days before any regulated renovation activity, the school building will be posted with a Notification of Lead Based Paint Renovation Activity form. A copy of the EPA's Pamphlet entitled The Lead-Safe Certified Guide to Renovate Right: Important Lead Hazard Information for Families, Child Care Providers and School can be obtained at the following link www.epa.gov/lead/pubs/renovaterightbrochure.pdf.

Information regarding the School District's Lead Based Paint Operations & Maintenance Plan, any planned regulated activities, a copy of the EPA Pamphlet and or information pertaining to any regulated activity can be obtained, free of charge, at the school district's Buildings and Grounds Office.