



DEPARTMENT OF THE NAVY

NAVAL STATION NEWPORT
690 PEARY STREET
NEWPORT, RI 02841-1522

IN REPLY REFER TO:

NAVSTANPTINST 5090.9B
PPR4

NOV 18 2011

NAVAL STATION (NAVSTA) NEWPORT INSTRUCTION 5090.9B

From: Commanding Officer, Naval Station Newport

Subj: LEAD PAINT PROGRAM

Ref: (a) 40 CFR 745
(b) OPNAVINST 5100.23 (series)
(c) UFGS-13282
(d) UFGS 13283
(e) OPNAVINST 5090.1 (series)
(f) Rhode Island Department of Environmental Management
Air Pollution Control Regulation No. 24
(g) 29 CFR 1910
(h) 29 CFR 1926
(i) 40 CFR 260-268

Encl: (1) Standard Operating Procedure (SOP) for Work on Painted Surfaces
(2) SOP for Paint Chip Sampling
(3) SOP for Exterior Lead Projects
(4) SOP for Interior Lead Projects

1. Purpose. To establish procedures and policies to be used while working with lead and lead paint at NAVSTA Newport.
2. Cancellation. NAVSTANPT/LOCAL AREA RI COORDINST 5090.9A.
3. Applicability. This instruction applies to all NAVSTA personnel, tenant commands, reserve center personnel attached to NAVSTA and contractors working on NAVSTA property. Compliance with references (a) through (i) and utilization of this instruction is mandatory for all projects involving renovation activities such as painting, window replacement, room renovation, utility repairs, door installation and all other activities designed to update, repair, maintain, demolish or modify all or parts of a building. This instruction does not apply to lead abatement work. Abatement is generally performed in circumstances to address a known or assumed lead based paint issue that includes response to a child with an elevated blood lead level and in housing/child occupied facilities receiving Housing Unit Development (HUD) or other financial assistance or

work in housing, target housing (constructed prior to 1978) or child occupied facilities such as child care centers and other facilities described in reference (a).

4. Background. Lead is most often associated with paints. In general, Navy policy is to manage lead based paint in place, provided it is in good condition and will not be disturbed. Lead is also found in plumbing materials, metal roof flashing, high voltage electrical system components, ballast, small arms ammunition, batteries and weights. Exposure to lead can occur during ballast handling, reclamation of lead acid batteries, bullet trap cleanout, lead machining, improper handling of contaminated personnel protective equipment, high voltage cable repair and abrasive blasting. The Navy policy for use, handling, maintenance and removal of materials containing lead during renovation, maintenance, repair or demolition is contained in references (b) through (e). State and Federal requirements are included in (f) through (i).

5. Discussion

a. The procedures described in this instruction apply to situations where the proposed work will disturb a structure's existing paint. This includes, but is not limited to, projects involving sanding, grinding, scraping and/or cutting of existing painted surfaces. It does not include the process of painting itself.

b. Prior to performing any work involving painted surfaces, representative paint samples must be taken and submitted for analysis unless evidence exists that no lead is present. Paint sampling procedures may be found in enclosures (1) and (2).

c. Use greater than 0.01 percent by weight or 100 ppm (parts per million) as the detection limit. If the analysis indicates that lead levels are below 500 ppm, then the area is considered lead free and requires no controls when performing work.

d. Use the table below to identify how work should be performed if lead in paint is greater than 500 ppm.

WORK AREA	REGULATION	ENCLOSURE
Exterior Non-Residential	References (f) and (h)	(1) and (3)
Interior Non-Residential	Reference (h)	(1) and (4)

6. Training

Training is required for working with leaded surfaces or leaded materials. Reference (b) lists the requirements.

7. Medical Requirements

a. All lead workers and supervisors are required to follow medical requirements set forth in references (b) and (g).

b. Blood samples may also be required.

8. Action

a. The NAVSTA Commanding Officer, shall ensure all lead work is performed in accordance with this instruction and prohibit self-help projects that involve disturbance of surfaces with lead paint.

b. Tenant commands at NAVSTA, shall ensure all lead work is performed in accordance with this instruction and prohibit self-help projects that involve disturbance of lead painted surfaces.

c. The Naval Health Clinic New England shall:

(1) Provide Industrial Hygiene (IH) services to assess air sampling feasibility, perform personal and area air sampling.

(2) Provide Occupational Health services for conducting all physical exams, personnel blood samples in accordance with reference (g) and maintaining all medical records for the required period of time.

d. The Facilities Engineering and Acquisition Division of the Public Works Department (PWD) shall:

(1) Ensure all contractors submit their lead plans to the NAVSTA Environmental Office (Code PRR4) for approval prior to the start of work.

(2) Ensure contractors perform all lead projects in accordance with references (a) through (i) and coordinate waste disposal with Code PRNP4.

(3) Write and update Unified Facilities Guide Specifications (UFGS) specifications 13282 and 13283 as necessary.

(4) Include the lead specification in all contracts in which painted surfaces that contain lead are scheduled to be disturbed through renovation, demolition, alteration, repair, maintenance and painting.

(5) Check the lead database to determine if the work area has been tested for lead. If testing has not been performed, qualified PWD personnel must collect paint samples and submit them to Code PRNP4 for analysis. Procedures for taking paint samples are outlined in enclosures (1) and (2).

(6) Attach the applicable procedure enclosures (1) and (3) or (4), to the work plan for shop jobs involving the disturbance of leaded surfaces.

(7) Submit a lead work plan to Code PRNP4 for approval for each job prior to start of work.

(8) Contact IH prior to start of work to schedule monitoring services.

(9) Ensure all employees assigned to perform lead work are trained and qualified in accordance with references (a) through (i).

e. The PWD Supervisor shall:

(1) Review each job to ensure that the proper method of removal, using the most efficient procedure, has been chosen for the work.

(2) Inspect work area prior to starting the work to ensure the area prepared properly.

(3) Be physically present at the site, at all times, while the work is underway and ensure all personnel are wearing the proper personal protective clothing.

(4) Ensure all records for each project are submitted to Code PRNP4 at the completion of each project.

(5) Contact IH or PRNP4 to take clearance wipes for the work area (if interior), or for visual clearance approval (if exterior).

f. The Environmental Office shall:

(1) Send paint chip samples to the lab for analysis and maintain the lead database.

(2) Perform lead inspections as required, including the clearance of areas in the absence of IH services.

(3) Review, comment and approve all lead plans submitted by NAVSTA personnel and contractors.

(4) Provide technical assistance concerning the lead paint program and review work specifications to ensure compliance. Provide overall guidance and support for the Lead Paint Program.

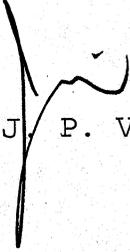
(5) Review and retain all lead records for work performed by NAVSTA personnel for five years from the end date of the project.

(6) Obtain and review new lead regulations for applicability and update this instruction as required.

g. The NAVSTA Navy Operation Safety Office shall:

(1) Perform respirator training and biannual fit tests in accordance with reference (b) and maintain all respirator records as required by reference (b).

(2) Ensure all personnel are notified of scheduled respirator fit tests and medical surveillance exams when they become due.


J. P. VOBORIL

STANDARD OPERATING PROCEDURE (SOP)
FOR WORK ON PAINTED SURFACES

1. General Requirements

a. Intact and maintained surfaces with lead do not require removal, even if lead levels are greater than 5000 ppm.

b. Prior to start of work on any painted surface, supervisors shall ensure that lead testing has been performed on that surface.

(1) If a determination is made that the paint does not contain lead, work may proceed without any lead controls.

(2) If the lead content of the paint is over the acceptable limits, the supervisor shall ensure that the SOP for the appropriate category of abatement is used to perform the job. The two categories of work with the applicable regulations and matching enclosure are listed in the below table:

WORK AREA	APPLICABLE REGULATION(S)	ENCLOSURE
Exterior Non-Housing	RIDEM Air Pollution Regulation No.24 and 29 CFR 1926.62 (References (f) and (h))	(3)
Interior Non-Housing	29 CFR 1926.62 (Reference (h))	(4)

2. Procedures. Along with the lead free levels cited in 5.c, working with lead paint on interior surfaces in the following situations shall not require adherence to references (a) through (i):

a. Disturbance of less than fifteen square feet (15 ft²) per unit.

b. Disturbance of less than three square feet (3 ft²) per room of any unit, facility, building or premise.

c. Disturbance of less than ten percent (10%) of the area of the building component, (e.g., window, door).

3. Waste. Total Characteristic Leaching Procedure testing shall be performed, to determine if it is a hazardous waste, on all lead paint waste prior to disposal unless the waste is automatically classified as a hazardous waste for lead, D008. Contact the Environmental Office (Code PRR4) to determine if testing is necessary.

STANDARD OPERATING PROCEDURE FOR PAINT CHIP SAMPLING

1. Paint chip samples are to be taken by those individuals who have attended lead training or have been specifically trained to take leaded paint samples.

2. When taking paint samples, all layers of paint must be included. The following procedure shall be used:

a. Use of respirators with High Efficiency Particulate Air (HEPA) filters, vinyl, butyl or nitrile gloves and coveralls required if sampling procedures will expose sampler to lead levels greater than the Permissible Exposure Limit.

b. Draw a floor plan of the building from which the samples will be taken. Once the sample areas have been selected, mark and number the sample locations on the floor plan.

c. All samples taken must be representative of the layers of paint present. The proper procedure to take a paint sample is as follows:

(1) Put on gloves and respirators (if required).

(2) Select area to take sample.

(3) Set up plastic bag under the area to be scraped.

(4) Scrape all layers of paint from a one square inch area into a plastic bag (down to substrate).

(5) Close bag and label.

d. The label should contain the following information:

(1) Building number.

(2) Date and time sample was taken.

(3) Room and location in room where sample was taken.

(4) Name and phone number of person taking sample.

e. Change gloves and clean tools prior to taking the next sample. When all samples have been taken, remove all protective clothing inside out and place in plastic bag for disposal.

STANDARD OPERATING PROCEDURE FOR EXTERIOR LEAD PROJECTS

1. This applies to the exterior of all structures (other than housing, target housing and child care facilities) at NAVSTA Newport. All exterior lead abatement work shall be performed per RIDEM Regulation No. 24 and 29 CFR 1926.62.
2. Five days prior to the start of work, written notification must be made to the following people/places. Use the standard notification form at the end of this enclosure:
 - a. To any adults residing in the structure.
 - b. To the owner, agent and/or property manager of the structure.
 - c. To any owner, agent and/or property manager of any structure located within 50 feet of the structure, including schools, businesses and other residences.
3. Prior to the start of work, all movable objects within 50 feet of the house must be moved outside the 50-foot radius. All objects that cannot be moved must be covered with a minimum of 6-mil polyethylene.
4. The ground shall be covered with a minimum of one 4-mil polyethylene layer. The ground cover shall extend out a minimum of ten feet from the building and be staked or weighted to ensure it remains in place. If a wet procedure is used, provisions must be made to collect the water for disposal.
5. All windows and doors on the side of the building where removal of paint with lead is to occur shall be sealed with 6-mil polyethylene from the outside if power tools are to be used. All vents to air conditioning/heating units shall be sealed. If windows and doors are to be removed, the opening shall be sealed from the inside.
6. A shroud or containment area must be constructed using 6-mil polyethylene sheeting to prevent release of lead into the environment if it is felt that the chips will escape the ground cover and enter the environment.
7. Warning signs shall be posted at all entrances and exits to the work area.

8. A change area must be provided for workers to don protective clothing; no street clothing shall be worn under the protective clothing. The change area shall also be equipped with a High Efficiency Particulate Air (HEPA) vacuum for removal of lead dust from clothing and items in the containment. This area must also be equipped with a wash area for workers to wash their hands and face prior to eating, drinking, smoking, chewing or applying cosmetics.

9. If it is determined that the project will expose workers to lead levels above the Permissible Exposure Limit, a three-chamber shower area will be required on site. All wastewater must be collected and disposed of properly.

10. Damaged painted surfaces will be removed using one of the following methods or an alternative method determined by Code PRNP4.

a. Heat Method. Open flame not allowed; heat gun may be used as long as the gun temperature does not exceed 1000 °F.

b. Mechanical Methods. Machine sanding and/or machine scraping is allowed only if the machine is equipped with an HEPA filter to collect the chips and dust.

c. Hand scraping. Hand scraping is allowed only if the surface is misted prior to manual scraping.

11. All required protective clothing shall be worn.

12. Disposal of lead waste shall be accomplished by turning it into Code PRNP4 for disposal. All waste shall be turned in at the end of each workday; none shall be stored at the work site.

13. The supervisor will contact the Industrial Hygiene to take all air samples and conduct a visual inspection at the completion of the project for clearance purposes.

NOTIFICATION OF REMOVAL OF LEAD BASED PAINT
(Required five days in advance of starting date)

Please be advised that lead based paint is about to be removed from the exterior of a structure at the address below.

Address

City/Town, State, Zip

Approximate dates for starting and finishing the project are:

From: _____ To: _____

Lead paint removal is to be done by:

Company Name

Name of Responsible Individual

Address

City/Town, State, Zip

Telephone

Method(s) to remove the lead based paint will be:

The paint that will be removed from this structure contains lead. Exposure to lead is unhealthful, particularly to young children. For a copy of Regulation 24 and a summary of the requirements, check the Regulations section at the Department's website at <http://www.dem.ri.gov>, or DEM's Office of Technical and Customer Assistance at (401) 222-6822. For information about lead poisoning prevention, call the Department of Health Lead Hotline at (800) 942-7434.

Complaints about improper removal:

8:30 a.m. to 4:00 p.m. weekdays DEM Office of Compliance and Inspection (401) 222-1360

At other times DEM Enforcement (301) 222-3070

STANDARD OPERATING PROCEDURES FOR INTERIOR LEAD PROJECTS

1. All movable objects shall be removed from the area; all non-movable objects shall be covered with 6-mil polyethylene sheeting and sealed with duct taped. All air intake and exhaust openings shall be sealed.
2. At a minimum, all openings to the work area shall be sealed with 6-mil plastic and duct tape. If a full containment is needed, the walls shall be constructed from one layer of 6-mil polyethylene sheeting, and floors shall be covered with two layers of 6-mil sheeting. The floor will extend onto the walls a minimum of six inches. Negative air machines shall be used to ensure that no lead dust is released to the interior environment.
3. Each containment space shall, at a minimum, contain a work area, a clean area, a shower area and a dirty room (that is equipped with an High Efficiency Particulate Air (HEPA) vacuum. All entrances and exits shall be made of double flaps installed in opposite directions.
4. Warning signs shall be posted at all entrances and exits to the work area.
5. If a full containment area is not required, an area will be designated as the wash area and equipped with provisions to wash the face and hands of personnel. All personnel must wash hands and face upon leaving the work area prior to eating, drinking, smoking, chewing or applying cosmetics.
6. Workers shall wear adequate protective clothing, including respirators. All workers shall not be allowed to wear their street clothing under their protective clothing.
7. Repainting of the surface or the use of vinyl wallpaper without replacement, removal or encapsulation (of the chipping or peeling paint) being performed is not allowed. Defective lead paint surfaces requiring abatement shall be abated using one of the following methods:
 - a. Replacement. Old surfaces with lead paint shall be removed and replaced with new surfaces that do not have lead paint.

b. Encapsulation. A permanent cover shall be installed over the lead paint surface. Encapsulate materials shall bind to the substrate and not just the surface paint.

c. Removal. There are several removal methods including:

(1) Wet hand scraping, with or without the use of a heat gun, (open flames not allowed), followed by light-feather sanding.

(2) Chemical removal using nonflammable chemical strippers that do not contain methylene chloride.

(3) Wet scraping by misting the surface, then scraping. Repeat misting is required as needed to maintain a wet surface.

(4) Sanding of the item with an HEPA vacuum attached to the sander to capture the dust.

8. At the end of each work shift, the work area shall be cleaned of all paint chips and the entire area HEPA vacuumed to remove the dust. The paint chips shall be placed in the five-gallon drum provided for each job. All waste shall be turned in at the end of each workday; none is allowed to be stored at the work site.

9. After the work has been completed using one of the above methods, a preliminary cleanup shall be performed as follows:

a. HEPA vacuum the containment area and carefully remove any polyethylene sheeting (except that which serves as a barrier between the work area and the other areas) by folding the plastic upon itself to trap all dust.

b. After removal of non-barrier polyethylene, the work area shall be HEPA vacuumed again, followed by wet cleaning (with de-leading solution such as TSP or Ledsolv) of the work area.

c. To ensure that airborne lead has time to settle, final cleanup shall commence no sooner than one hour after the preliminary cleanup.

d. The final cleanup shall consist of HEPA vacuuming of all surfaces in the work area, followed by wet cleaning the area with a de-leading detergent, and then HEPA vacuuming the area again. This is completed prior to the area being unsealed from the surrounding areas.

10. Once cleanup is complete, clearance wipes must be taken in the work area. The wipes shall be taken on the floor, windowsills and window wells. The number of wipes shall be determined by PRR4 prior to the start of the project. Maximum area lead dust clearance levels of 200 micrograms per square foot are recommended to ensure lead hazards have been removed.

11. If the wipe samples show that the lead levels in the containment area are above 200 micrograms per square foot, the area must be re-cleaned by repeating steps 9 and 10.

12. During the project, the Industrial Hygiene is responsible for ensuring that personal monitoring is performed on the workers.

13. Disposal of lead waste shall be accomplished by turning it in to PRNP4. All waste shall be turned in at the end of each workday; none shall be stored at the work site.