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## LEAD WORK STATEMENT

Prior to any maintenance, renovations, repainting, construction, or demolition project that could disturb painted surfaces, or involve work in areas where lead containing material (LCM) may be present, Project Managers (PM) must first contact EHS (Marlin Phillips) to request a hazardous materials inspection. EHS shall discuss the project scope with the PM, review past inspection records, and determine if an inspection of the area is needed. The EHS representative will perform the inspection, and a report will be sent to the PM detailing lead concentration within the materials tested in the area.

FM employees shall only perform work that involves disturbing painted surfaces that contain lead if they have attended the 2-hour “Lead In Construction” Training provided by EHS, and been deemed qualified by their supervisor. There is no circumstance in which unqualified, untrained workers should perform work on LCM.

With current engineering controls, such as wet-removal of paint surfaces, and power tool accessories with HEPA vacuum attachments, past inspection and hazard assessment records indicate that LCM disturbing activities, such as sanding and scraping, have not resulted in employee exposure above the Permissible Exposure Limit (PEL), therefore not requiring the mandatory use of respiratory protection. The above mentioned engineering controls **must** be utilized when disturbing painted surfaces that contain lead. If concerns of lead exposure arise, employees are encouraged to observe the Voluntary Use of Respiratory Protection, involving the use of filtering facepieces. Voluntary use of filtering facepieces must be recognized by FM-OHS, and requires participation in the FM-OHS Respiratory Protection Program.