



INDIANA UNIVERSITY

OFFICE OF THE EXECUTIVE VICE PRESIDENT
FOR UNIVERSITY ACADEMIC AFFAIRS

University Environmental Health and Safety

Lead Safety Program

January 19, 2016

1. INTRODUCTION

1.1 Purpose

Indiana University Environmental Health and Safety (IUEHS) has developed this Program to promote a safe work environment and to protect the health and safety of Indiana University faculty, staff, and their families who may potentially be exposed to lead hazards. This Program is intended to comply with the Occupational Safety and Health Administration (OSHA) Standards contained in [29 CFR 1910.1025](#), (including [Appendices A, B, and C](#)), [29 CFR 1926.62](#) and [EPA 40 CFR, Part 745, \(including Sub-parts D, E, F, and L\)](#), and [24 CFR Title X](#).

1.2 Scope

This Program covers all work activities that have the potential to disturb lead-containing materials (LCM). These activities include; construction, repair, renovations or demolition with a potential for exposure to lead.

2. AUTHORITY AND RESPONSIBILITY

2.1 University Environmental Health and Safety (IUEHS) is responsible for:

- 2.1.1 Developing the Lead Safety Program and revising the Program as deemed appropriate;
- 2.1.2 Performing risk assessments, exposure assessments, and identifying lead-containing material upon request or as deemed necessary;
- 2.1.3 Performing exposure monitoring or identifying employee exposure levels upon request or as deemed necessary;
- 2.1.4 Maintaining lead sampling results information;
- 2.1.5 Approving work processes;
- 2.1.6 Providing medical surveillance oversight;
- 2.1.7 Maintaining training records;
- 2.1.8 Providing consultation on any issues involving working with or around lead containing materials;
- 2.1.9 Providing guidance to UAO regarding construction projects that contain lead materials; and
- 2.1.10 Disposing of lead waste generated by either contractors or campus employee activities in accordance with IU's Waste Management Program.

2.2 Departments are responsible for:

- 2.2.1 Ensuring affected employees are trained and comply with this Program;
- 2.2.2 Providing employees with the required personal protective equipment (PPE); and
- 2.2.3 Ensuring employees complete complete medical surveillance requirements as necessary;

2.3 Supervisors are responsible for:

- 2.3.1 Coordinating the assessment of materials to determine lead content as necessary to determine exposure potential;
- 2.3.2 Providing employees with proper hygiene facilities including change rooms, showers, lunchrooms and lavatories; and

- 2.3.3 Notifying IUEHS for your respective campus whenever a control or personnel change may result in new or additional exposure to lead.
- 2.3.4 Contacting IUEHS for the respective campus if it is determined or suspected that employees have a potential to be exposed to an airborne concentration of lead at or above the OSHA Permissible Exposure Limit of 50 µg/m³.

2.4 Employees, (i.e., maintenance, welders, police, abatement personnel and utilities), are responsible for:

- 2.4.1 Using provided PPE correctly throughout the duration of the project;
- 2.4.2 Communicating with their supervisors any lead hazard concerns and their ability to safely perform the assigned jobs;
- 2.4.3 Following approved procedures;
- 2.4.4 Performing assigned jobs in a safe and healthful manner; and
- 2.4.5 Attending required training.

2.5 University Architect's Office is responsible for:

- 2.5.1 Notifying IUEHS of construction projects that may involve disturbance of painted surfaces in buildings built before 1978, including residential rentals and child care facilities;
- 2.5.2 Hiring Certified Lead Renovators for all lead Renovation, Repair, and Painting (RRP) and Lead Abatement projects;
- 2.5.3 Disclosing the presence of lead-containing materials (LCM) to contractors and/or vendors; and
- 2.5.4 Ensuring that the Certified Renovator provides project specific lead-safe work practice training to all team members.

2.6 Maintenance Groups (outside of target housing) are responsible for:

- 2.6.1 Notifying IUEHS of construction projects that may involve disturbance of painted surfaces in buildings built before 1978.
- 2.6.2 Hiring Certified Lead Contractors for all lead Renovation, Repair, and Painting (RRP) and Lead Abatement projects; and
- 2.6.2 Disclosing the presence of lead-containing materials (LCM) to contractors and/or vendors.

2.7 Target Housing: Facility Services/Physical Plant, Real Estate, and Residential Program Services Housing are responsible for:

- 2.7.1 Notifying IUEHS of any renovation, maintenance, and abatement practices on target housing or child occupied facilities, prior to the start of work;
- 2.7.2 Providing notification to the housing occupants, prior to signing a lease, renovation activities, and selling a property, about the presence of lead-based paint or lead-based paint hazards;
- 2.7.3 Providing lessees of target housing, or residential facilities, with a copy of the EPA pamphlet, *Renovate Right: Important Lead Hazard Information for Families, Child Care Providers and Schools*;
- 2.7.4 Providing lessees of campus daycare centers with EPA pamphlets to be distributed to parents and guardians as necessary;
- 2.7.5 Providing a signed copy of Appendix H – Lead Safety Program, to IUEHS for each project no later than 60 days prior to project start date; and
- 2.7.6 Ensuring that the Certified Renovator provides project specific lead-safe work practice training to all team members.

3 PROGRAM ELEMENTS

Exposure to lead can occur when employees inhale or ingest lead dust or fumes during activities that include demolition, renovation, or repair of surfaces or materials that contain lead. The following

requirements shall be implemented to protect employees and building occupants from such health effects from lead exposure.

3.1 Site Assessment

Prior to the start of any renovation, demolition, or repair of lead containing materials, IUEHS and/or a certified personnel shall determine if any lead containing material will be disturbed and/or the potential for generation of lead contaminants. This assessment shall be conducted utilizing a site surveys and/or testing, as appropriate. Activities include, but are not limited to the disturbance of Lead-based Paint (LBP) and/or welding/cutting leaded surfaces (presumed work activities are located in Appendix G of this Program). Historical data may be used, where applicable.

3.2 Classification of Work and Work Procedures for Lead-Based Paint

3.2.1 Lead work and procedures shall be classified as follows:

3.2.1.1 Class A work involves localized work that has the potential to generate negligible quantities of lead contaminated dust but not debris (i.e. hanging pictures, removing chalkboards, etc.). Class A work procedures are identified in Appendix B.

3.2.1.2 Class B work involves work activities that have the potential to generate moderate quantities of lead contaminated dust and debris. A moderate amount is clearly visible, may contain debris and paint chips, but will not spread beyond a small area of the drop cloth to any other surface in the room/area (e.g. breaking small holes into walls, manual sanding of small areas). Class B work procedures are identified in Appendix C.

3.2.1.3 Class C work involves work activities that have the potential to generate significant quantities of lead contaminated dust and debris. A significant amount is an amount that cannot be contained simply by the use of a small area drop cloth (e.g. demolition activities, removal of lead). This includes window removal (see Appendix E).

Note: All Class C work shall be conducted by a certified lead contractor with arrangements made by a representative from IUEHS to ensure appropriate procedures are conducted. The procedures may include personal monitoring, area monitoring, clearance level sampling, ventilation concerns and critical barrier requirements.

A Lead-Based Paint Disclosure shall be sent to the building occupants for all Class C work (Appendix F).

3.2.1.4 Welding on exterior surfaces (e.g., fire escapes) covered with lead coatings or paint shall be conducted per Appendix D and [IU's Welding, Cutting and Brazing Safety Program](#).

3.3 Child Occupied Facilities and Target Housing

Child care facilities and housing for children aged 6 and under are considered child occupied facilities. Target housing is any housing constructed prior to 1978. All operations and maintenance activities shall be conducted with the procedures identified in Appendices B and C.

3.3.1 If bulk sample results indicate the presence of lead in any building material in a child occupied facility, a certified lead contractor shall conduct all work with arrangements made by a representative from IUEHS to ensure appropriate procedures are conducted.

- 3.3.2 Environmental Protection Agency (EPA) Renovation, Repair and Painting (RRP) Rule requires individuals to receive certain information before renovating 6 ft² or more of painted surfaces for exterior projects in housing, child care facilities and schools built before 1978. Additionally, the law requires that certain work practices designed to prevent lead contamination must be followed. Those trained by EPA certified trainers are EPA Certified Renovators; employees trained by Certified Renovators are considered non-certified workers and must be supervised during the set-up and cleaning phases of all painting renovations. All RRP Projects contracted by Indiana University will require a clearance sampling. The clearance examination must be conducted by an IUEHS certified risk assessor, lead inspector or clearance examiner.
- 3.3.3 The following warning sign shall be posted in each work area where the RRP rule applies. This sign must remain in place and be readable through completion of the renovations and the post renovation cleaning verification. Additionally, a warning sign must be posted:
- At each entry to the work area;
 - At each main and secondary entryway to a building from which occupants have been relocated to; and
 - For exterior work where it is easily read 20 feet from the edge of the worksite.

CAUTION
RENOVATION WORK
DO NOT ENTER WORK AREA UNLESS AUTHORIZED
NO SMOKING, EATING OR DRINKING

3.4 Exposure Monitoring

- 3.4.1 Exposure determinations will be based on exposure that would occur if the employee were not using respiratory protection.
- 3.4.2 Full shift personal samples will be collected representing, at a minimum, one sample per job classification, work area and shift which are representative of employees' regular, daily exposure to lead.
- 3.4.3 All sampling will be conducted by IUEHS or an IUEHS approved consultant;
- 3.4.4 If sample results indicate employees are not exposed at or above the action level, then no further action is required.
- 3.4.5 If sample results indicate employees are exposed at or above the action level, then additional monitoring will be conducted for each employee in the workplace exposed to lead, utilizing worst-case scenario methodologies.
- 3.4.6 If sample results indicate that employees are exposed to lead above the PEL, monitoring will be conducted quarterly. Monitoring will continue at least every 7 days until appropriate results are obtained.
- 3.4.7 Additional monitoring will be required whenever there is a production, process, control or personnel change which may result in a new or additional exposure to lead or whenever there is reason to suspect a change which would result in a new or additional exposure to lead and will be conducted with all the provisions of this section.

3.5 Personal Protective Equipment

3.5.1 Respiratory Protection

Whenever engineering and work practice controls are not sufficient in reducing employee exposure at or below the permissible exposure limit of 50 µg/m³, a full-face respirator with HEPA filters required. Employees may request to use a powered-air purifying respirator. Respirator use requires a medical examination, training and fit testing prior to its first use. Please refer to the Indiana University [Respiratory Protection Program](#) for specific information.

3.5.2 Protective Clothing

Whenever an employee is exposed to lead at or above the PEL, appropriate [personal protective equipment](#) (PPE) shall be worn. This includes, but is not limited to: coveralls, gloves, hats, shoe covers, face shields and vented goggles.

3.5.2.1 Personal protective equipment must be cleaned and/or properly disposed of at the end of each shift. Protective clothing is to be removed in clean change areas and placed in a closed container which prevents the release of lead contaminants. The container must be labeled with the following information:

CAUTION: CLOTHING CONTAMINATED WITH LEAD. DO NOT REMOVE DUST BY BLOWING OR SHAKING. DISPOSE OF LEAD CONTAMINATED WASH WATER IN ACCORDANCE WITH APPLICABLE LOCAL, STATE, OR FEDERAL REGULATIONS.

3.6 Tools and Equipment

3.6.1 Whenever an employee is exposed to lead at or above the PEL, appropriate tools and equipment must be utilized.

3.6.2 Tools and equipment must be cleaned and, if needed, repaired or disposed of and replaced.

3.7 Signage

3.7.1 The following sign shall be posted in workplaces where Class A, B and C work is conducted:

WARNING
LEAD WORK AREA
POISON
NO SMOKING OR EATING

3.8 Medical Surveillance

3.8.1 Biological monitoring and medical examinations are required for IU employees exposed at or above the action level for more than 30 days per year. Biological monitoring consists of blood sampling and analysis for lead and zinc protoporphyrin (ZPP) levels.

3.8.2 Biological monitoring will be conducted per the below requirements:

- Biological monitoring is to be conducted every six months for employees exposed at or above the action level for more than 30 days per calendar year.
- Biological monitoring is to be conducted every two months for employees whose blood sampling and analysis reveals an elevated blood lead level, at or above 40µg/100g.
- Biological monitoring is to be conducted monthly for employees placed on medical removal protection.
- Follow-up biological monitoring is to be conducted within two weeks for employees whose blood sampling reveals blood lead levels at or above 60µg/100g.

3.8.3 Temporary Medical Removal and Return will be instituted when:

- The employee's periodic and follow-up blood sampling reveals levels of 60µg/100g.
- The average of the past three blood sampling tests (or average of all tests within past 6 months, whichever is longer) reveals levels at or above 50µg/100g.
- The medical evaluation results in a finding, determination or opinion that the employee's medical condition places an increased risk of material impairment to health from exposure to lead.
- IUEHS will work closely with employees placed on Medical Removal and Return. Normal work duties may resume when:
 - Two consecutive blood sampling and analysis tests reveal levels below 40µg/100g; or
 - When a subsequent medical evaluation findings, determination or opinion detects the employee's medical condition no longer places an increased risk of material impairment to health from exposure to lead.

4. TRAINING AND RECORDKEEPING

4.1 Annual training is to be provided to employees subject to the exposure of lead at or above the action level, 30 µg/m³. Training shall include the following information:

- Content of 29 CFR 1910.1025 and Appendix A, B and C;
- Specific nature of operations which could result in exposure to lead above the action level;
- Purpose, selection, fitting, use, and limitations of the respirator;
- Purpose and description of the medical surveillance program, and medical removal protection program including the adverse health effects associated with exposure to excessive amounts of lead.
- Engineering controls and work practices associated with an employee's specific job assignment;
- Contents of any compliance plan in effect; and
- Instruction to employees that chelating agents should not be routinely used except under the direction of a licensed physician.

4.2 Recordkeeping

4.2.1 Exposure monitoring and medical surveillance records shall be maintained for duration of employment plus 30 years.

4.2.2 Target housing and daycare center facility notification record activities shall be kept in project file for 30 years from date of notification;

4.2.3 Employee training records shall be kept on file for the duration of employment.

5 REFERENCES

[29 CFR 1910.1025](#), Lead

[29 CFR 1910.1025, Appendix A](#), Substance Data for Occupational Exposure to Lead

[29 CFR 1910.1025, Appendix B](#), Employee Standard Summary

[29 CFR 1910.1025, Appendix C](#), Medical Surveillance Guidelines

[29 CFR 1926.62](#), Lead

[EPA 40 CFR, Part 745, Subpart D](#) Lead-Based Paint Hazards

[EPA 40 CFR, Part 745, Subpart E](#) Residential Property Renovation

[EPA 40 CFR, Part 745, Subpart L](#) Lead-Based Paint Activities

OSHA Safety and Health Topics, [Lead](#)

[OSHA Technical Manual Section V: Chapter 3](#), Controlling Lead Exposures in the Construction Industry

[24 CFR Title X](#)

[Indiana University Personal Protection Equipment](#)

[Indiana University Respiratory Protection Program](#)

6 REVISIONS

New document: January 19, 2016

APPENDIX A – GLOSSARY

Action Level: Employee exposure to an airborne concentration of lead of 30 micrograms per cubic meter (30 $\mu\text{g}/\text{m}^3$) of air averaged over an 8 hour period.

Blood Lead Level (BLL): A measure of the amount of blood lead present in an individual's blood.

Certified Renovator: A worker who has taken the training and testing that permits him or her to remove lead-containing paint and to supervise other trained workers at this task. Certified Renovator can provide training to other workers per EPA-approved curriculum.

Child Occupied Facility: 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, 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 visit lasts at least 60 hours.

EPA Pamphlet: The lead hazard information pamphlet given to homeowners and tenants prior to beginning removal of lead paint.

Historical Data: Refers to actual employee monitoring data collected within the last 12 months. The employer must have performed an exposure assessment using this data.

Initial Determination: Each employer who has a workplace or work operation covered by this standard shall determine if any employee may be exposed to lead at or above the action level.

Lead: Metallic lead, all inorganic lead compounds, and organic lead soaps. Excluded from this definition per OSHA are all other organic lead compounds.

Lead-Based Paint (LBP): Paint containing at least 0.7 milligrams of lead per square centimeter (per OSHA) (or 1.0 milligram of lead per square centimeter of surface area, per EPA), or 0.5% lead by weight.

Lead Abatement: Set of measures designed to permanently remove lead-based paint or lead-based paint hazard.

Lead Exposure Assessment: Determination of employee exposure to lead by sampling/monitoring the employee's regular exposure to lead, typically in an 8-hour work day.

Micron (μ): A unit equal to one millionth.

Permissible Exposure Limit (PEL): Concentrations less than fifty micrograms per cubic meter (50 $\mu\text{g}/\text{m}^3$) of air averaged over an 8-hour period.

Renovation: Modification of an existing structure, or portion of an existing structure that results in the disturbance of painted surfaces.

Target Housing: Any housing constructed prior to 1978, except housing for the elderly or persons with disabilities (unless and child who is less than 6 year of age resides or is expected to reside in such housing) or any zero-bedroom dwelling.

Appendix B – Class A Work Procedure

Class A work involves localized work that has the potential to generate negligible quantities of lead contaminated dust but not debris (hanging pictures, removing chalkboards, etc.). All Class A work debris can be conducted by University employees and general contractors and shall be conducted as follows:

- Place a plastic drop cloth under the immediate work area;
- Use strong tape for removal of dust and fragments;
- Mist the work area with clean water prior to sanding if sanding is necessary;
- Proceed with required work;
- Wash immediate work area and tools with a detergent/water solution;
- Rinse the area with clean water;
- Gently roll the drop cloth inward from the outside edges to the center;
- Dispose of tape, drop cloth and used towels into a plastic bag labeled “Lead Contaminated Waste”;
- Dispose of all plastic bags inside drums provided at a designated location; and
- Contact IUEHS for the respective campus for [disposal](#) as needed.

Appendix C – Class B Work Procedure

Class B work involves work activities that have the potential to generate moderate quantities of lead contaminated dust and debris. A moderate amount is clearly visible, may contain debris and paint chips, but will not spread beyond a small area of the drop cloth to any other surface in the room/area (e.g. breaking small holes into walls, manual sanding of small areas). All Class B work can be conducted by University employees and general contractors and shall be conducted as follows:

- Move furnishings and equipment away from the area of work;
- Place a plastic drop cloth over fixed equipment or furnishings;
- Place a plastic drop cloth on floor under working area and extending five feet from all areas of work;
- Overlap and seal additional drop cloths as necessary with duct tape;
- Turn drop cloth up baseboard of wall within the work area and seal to wall with duct tape;
- Limit access through the work area to workers utilizing barricade tape across the door;
- Mist the work area using clean water;
- Use a putty knife or scraper to scrape loose paint flakes and deteriorated subsurfaces;
- Chip or wet sand all edges until no loose paint remains on the surface;
- Wash immediate area and tools with a detergent/water solution;
- Rinse the area with clean water;
- Gently roll the drop cloth inward from the outside edges to the center;
- Dispose of tape, drop cloth, personal protective equipment and used towels into a plastic bag labeled "Lead Contaminated Waste";
- Immediately wash hands and face thoroughly;
- All work areas shall be visually inspected after clean-up procedures to ensure no visible dust is left in the work area;
- Dispose of all plastic bags inside drums provided at a designated location; and
- Contact IUEHS for [disposal](#) as needed.

Appendix D – Welding Exterior Surfaces

Exterior operations and maintenance activities are prohibited on windy days (winds greater than 15 miles per hour or the chips and dust are blowing off the plastic sheeting) as determined by the supervisor or project manager in charge of the job.

Welding on exterior surfaces (e.g., fire escapes) covered with lead coatings or paint shall be conducted as follows:

- Obtain a [Hot Work Permit](#) in accordance with the IU Hot Work Program;
- Provide portable and or mechanical ventilation (e.g., local exhaust) capable of keeping the levels of fumes, dust and gases below action level and exposure limits;
- If welding shall be conducted near air intakes, building ventilation systems shall be modified so that the lead contaminants are not introduced into the building;
- Utilize respiratory protection when engineering controls are not feasible;
- Wear gloves, apron and/or jacket that are made of a material which is an insulator from heat and electricity;
- Wear welders helmet equipped with proper filter plate and cover lenses;
- Place a fire resistant tarp below the work area;
- Cover any combustibles in the path with a fire resistant tarp;
- Provide a fire watch on ground level;
- Provide a Class A fire extinguisher;
- Keep adjacent and surrounding windows closed for the duration of the activity;
- Limit access through the work area to workers utilizing barricade tape around the area;
- Mist the work area using clean water;
- Use a putty knife or scraper to scrape loose paint flakes and deteriorated subsurfaces;
- Wash immediate area and tools with a detergent/water solution;
- Rinse the area with clean water;
- Gently roll drop cloth inward from the outside edges to the center;
- Dispose of drop cloth, personal protective equipment and used towels into a plastic bag labeled “Lead Contaminated Waste”;
- Wash hands and face thoroughly.
- All work areas shall be visually inspected after clean-up procedures to ensure that no visible dust or debris is left in the work area;
- Dispose of all plastic bags inside drums provided at a designated location; and
- Contact IUEHS for the respective campus for [disposal](#) as needed.

Appendix E – Window Removal Procedures

Exterior window removal of windows from the outside of a building is prohibited on windy days (winds greater than 15 miles per hour or the chips and dust are blowing off the plastic sheeting) as determined by the supervisor or project manager in charge of the job.

The removal of windows is considered Class C work. The exterior removal of window which have lead-based paint shall be conducted as follows:

- Seal off the work area by covering entryways with six mil polyethylene plastic sheeting and barrier tape, if you are working on the window from the inside;
- All adjacent and surrounding area windows shall be kept closed;
- Put a piece of plywood on the inside of the window and tape polyethylene plastic over the plywood extending 12 inches past the plywood, if you are working on the window from the outside;
- Tape plastic over the entire outside window opening, if you are working on the window from the inside;
- Cover the floor inside under the window with polyethylene plastic sheeting to catch any falling dust;
- Cover bare soil and vegetated areas with polyethylene extending at least five feet from the base and an additional three feet for every story where the windows are located;
- Spray the window sill and frame with clean water to reduce the generation dust;
- Remove the window unit from the outside of the building, if possible;
- Completely wet-scrape, use a High Efficiency Particulate Air (HEPA) vacuum to clean debris and wash the window opening before removing the plastic seal inside;
- Collect all dust and paint chips as the window is disassembled;
- Gently roll the drop cloth inward from the outside edges to the center;
- Dispose of drop cloth into a plastic bag labeled "Lead Contaminated Waste";
- Wash hands and face thoroughly;
- All work areas shall be visually inspected after clean-up procedures to ensure that no visible dust or debris is left in the work area;
- Dispose of all plastic bags inside drums provided at a designated location; and
- Contact IUEHS for the respective campus for [disposal](#) as needed.

Appendix F – Lead-Based Paint Disclosure

Dear Building Occupant,

Recently your work area, located at _____ was tested and identified with the presence of lead-based paint. All workers conducting the work have been trained in the proper procedures to minimize the generation of lead contaminated dust and debris. Clean up and disposal methods will also be strictly adhered to during these operation and maintenance activities.

These activities will begin _____ and end on _____ and will consist of: _____

Please ensure that all windows are kept closed during these activities. If you have any questions or concerns, please feel free to contact IUEHS for your respective campus. Thank you.

Appendix G - Categories of Presumed Exposure

| | Category 1 | Category 2 | Category 3 |
|----------------------------------|--|--|---|
| Permissible Exposure Limit (PEL) | Over the PEL, but less than 10 times the PEL | Greater than 10 times the PEL, but less than 50 times the PEL | Over 50 times the PEL |
| Activities | <ul style="list-style-type: none"> -Manual demolition (e.g. dry wall) -Manual scraping -Manual sanding -Heat-gun application -Power-tool cleaning with dust collection systems -Spray painting with lead paint | <ul style="list-style-type: none"> -Rivet busting -Power tool cleaning without dust collection system -Cleanup activities in which dry, expendable abrasives are used -Abrasive blasting enclosure movement or removal -Using lead-containing mortar -Lead burning | <ul style="list-style-type: none"> -Abrasive Blasting -Welding -Cutting -Torching |

Note: For all three categories of tasks with presumed exposures over the PEL, Indiana University is required to provide the following before doing the exposure assessment:

- Appropriate [respiratory protection](#), and
- Tyvek or other PPE.

Appendix H - Lead Safety Program, *Renovate Right: Important Lead Hazard Information for Families, Child Care Providers and Schools* pamphlet

Indiana University's Lead Safety Program is designed to protect the health and safety of employees and their families from potential lead hazards. To comply with the Environmental Protection Agency's (EPA) Renovation, Repair and Painting Rule (RRP) the Renovate Right pamphlet must be provided to the following:

- Owner, i.e., Indiana University department performing or managing renovation or repair
- Lessee, i.e., occupant(s) in target housing and/or child occupied facilities
- Parents and guardians
- Affected units in multi-unit target housing

Project # or name _____ Address: _____

I have distributed and/or received a copy of the EPA pamphlet *Renovate Right; Important Lead Hazard Information for Families, Child Care Providers and Schools*.

| | |
|----------------------------------|-------------|
| Owners Name ¹ : _____ | Date: _____ |
| Owners Signature: _____ | Date: _____ |

| | |
|----------------------------------|-------------|
| Lessee Name ² : _____ | Date: _____ |
| Lessee Signature: _____ | Date: _____ |

| | |
|-------------------------------------|-------------|
| EHS Representative Name: _____ | Date: _____ |
| _____ | |
| EHS Representative Signature: _____ | Date: _____ |
| _____ | |

¹ Owners Name refers to the Indiana University department responsible for distribution of the EPA pamphlet. Owner must provide EPA, Renovate Right pamphlets to each affected target multi-unit housing.

² Lessee Name refers to target housing and/or child occupied facility lessee. Lessee of a child occupied facility must provide copies of the EPA Renovate Right Pamphlet to parents and guardians.