

May 22, 2000

To: Lead Abatement Contractors

Subject: Exposure Air Monitoring

After review of rules for exposure monitoring requirements under OSHA 1926.62 and VSA title 18 Chapter 38, it has become apparent that there is still a fair amount of confusion over proper implementation and interpretation of these regulations. In our conversations with the various abatement contractors, we have discovered a large amount of variability in the way exposure monitoring is being conducted. This ends up being a real problem for companies that are trying hard to be in compliance with the law. Consequently, the Vermont Housing and Conservation Board has decided to take a more active role in helping contractors be in compliance with the exposure monitoring standards. To this end, VHCB will pay for testing of air samples and will provide forms and technical assistance on air monitoring. It is our goal to help contractors be in compliance with the standards so that they may avoid potential regulatory problems. VHCB is also actively working with the Vt. Dept. of Health and other regulatory agencies to establish standardized interpretations of the regulations.

In order to achieve a level of standardization for exposure monitoring, the Vermont Housing and Conservation Board will be implementing the following changes for all lead abatement contractors on the pre-qualified list:

1. The Vermont Housing and Conservation Board will now pay for all laboratory costs associated with exposure monitoring by air sample.
2. VHCB will provide technical assistance with sampling methodology and properly setting up exposure monitoring databases.
3. Contractors will be provided with air sample data collection sheets.
4. Only samples collected from VHCB funded jobs may be submitted.
5. Samples are to be submitted to VHCB personnel in the field, mailed to the VHCB office, or brought by person to the VHCB office.
6. Samples will be submitted only to Schneider Laboratories Inc., Richmond Virginia for analysis.

7. VHCB will insure Schneider Laboratories Inc. maintains NLLAP, ELPAT, and state of Vermont accreditation, and will regularly check laboratory Q.C. protocols
8. Sample collection and analysis methods shall conform to the NIOSH 7082 standard.
9. Schneider laboratories will fax or mail results of sampling to the VHCB office. VHCB will provide results to individual contractors.
10. Contractors shall provide results of sampling results showing exposure by operation to VHCB for use in our database. Names and ID #'s of employees may be omitted. (VHCB's interest is in monitoring exposures of certain tasks on an industry wide basis).
11. Monitoring frequency shall conform to OSHA 1926.62 standards. It should be understood that contractor participation in this program alone is not enough to satisfy the compliance requirements of OSHA 1926.62. Each contractor must establish a database of exposure levels at each operation.
12. Monitoring shall conform to all regulations described in VSA title 18 Chapter 38, section 2.4.4 and section 4.5.4

For any questions regarding air sampling or this policy, please feel free to contact me at (802) 828-0170

*VHCB Lead Based Paint Hazard reduction Program*