

SECTION 3 CHAPTER 11

LEAD

Purpose

This chapter outlines the lead abatement program established to communicate information to employees of any workplace potential exposure to airborne lead at any level according to OSHA 1910.1025.

Scope

All company employees who work in areas that may be exposed to lead at or above the action level or for whom the possibility of skin or eye irritation exists.

In this chapter

Topic	See Page
Employee Information and Training	2
Monitoring	4
Written Employee Notification	5
Engineering and Work Practice Controls	6
Written Compliance Program	6
Respiratory Selection	6
Protective Work Clothing and Equipment	7
Medical Surveillance	8
Biological Monitoring	8
Employee Notification	8
Hygiene Facilities and Practices	9
Signs	10



Lead Abatement Program

Employee information and training

Employees shall be informed of appendices A & B of the regulation. All affected employees are required to attend initial and annual training programs.

The employee shall be informed of:

- the specific nature of operation which could result in the exposure of lead above the action level
- the purpose, proper selection, fitting, use, and limitations of the respirators
- Engineering controls
- Purpose and a description of the medical surveillance program; and
- the medical removal program

The company will provide training for current employees within 180 days of the affective date of the program. Also, any new hire will receive the same training upon initial job assignment. This training will be repeated annually for each employee.

The company requires that each employee shall be informed of the following:

- The content of the regulator standard and its appendices
- The specific nature of the operations which could result in exposure to lead above the action level
- The purpose, proper selection, fitting, use, and limitations of respirators
- The purpose and a description of the medical surveillance program, and the medical removal protection program including information concerning the adverse health effects associated with exposure to lead (With particular attention to the adverse reproductive effects of both males and females)
- Health effects of lead including acute symptoms lead poisoning (irritability, fatigue, headaches, nausea, anemia) and potential chronic health effects from long term exposure (reproductive, nervous, and urinary systems)
- The engineering controls and work practices associated with the employees job assignment
- The contents of any compliance plan in affect; and
- instructions to employees that lead removing medicines should not routinely by used to remove lead from their bodies and should not be used at all except under the direction of a licensed physician



This program will inform employees of:

- The specific hazards associated with their work environment
- Protective measure which can be taken
- The danger of lead to their bodies (including reproductive systems)
- Locations where lead containing materials can be encountered (e.g., tank batteries, lead glass, lead paint (pre-1978), mining and smelting, lead solder/pipes), oilfield tubing, pipe dope
- Their rights under the OSHA standard 1910.1025 Lead
- The company will have available to all employees including those exposed below the action level, a copy of 1910.1025 Lead and its appendices and must distribute to all employees any materials provided to the company by OSHA.



Monitoring

Permissible Exposure Limit (PEL):

The company shall assure that no employee is exposed to lead at concentrations greater than 50 micro grams per cubic meter of air averaged over an 8 hour period. All properties, workplaces, or work operations that could be subject to possible exposure described in the program will have an industrial hygiene survey done to ensure accuracy, and to determine if any employee may be exposed to lead at or above the action level.

Initial Determination:

This initial determination must include instrument monitoring of the air for the presence of lead and must cover the exposure of a representative number of employees who are reasonably believed to have the highest exposure levels.

If lead is present in the workplace in any quantity, the company will make an initial determination of whether the action level has been exceeded for any employee.

The company shall conduct appropriate air sampling for lead. If there have been any employee complaints of symptoms which may be attributable to exposure to lead or if there is any other information which would indicate employee exposure to lead, this must also be considered as part of the initial determination.

Air Sampling:

If this initial determination shows that a reasonable possibility that exists that any employee may be exposed, without regard to respirators, over the action level, the company must set up an air monitoring program to determine the exposure level of every employee exposed to lead at that workplace.

In carrying out this air monitoring program, the company is not required to monitor the exposure of every employee, but must monitor a representative number of employee and job types.

Enough sampling must be done to enable each employee exposure level to be reasonable represented by at least one full shift (at least 7 hours) air sample. In addition, the air samples must be taken under conditions which represent each employee's regular daily exposure to lead.

Frequency:

If the initial determination or subsequent monitoring reveals employees exposure to be at or above the action level but below the permissible exposure limit the company shall repeat monitoring in accordance with this



paragraph at least every 6 months.

Monitoring - continued

The company shall continue monitoring at the required frequency until at least two consecutive measurements (taken at least 7 days apart) are below the action level at which time the company may discontinue monitoring for that employee except as otherwise noted in this section.

If the initial monitoring reveals that employee exposure is above the permissible exposure limit the company shall repeat monitoring quarterly.

The company shall continue monitoring at the required frequency until at least two consecutive measurements (taken at least 7 days apart) are below the PEL but at or above the action level at which time the company shall repeat monitoring for the employee except as otherwise noted in this section.

Additional Monitoring:

Whenever there has been a production, process, control or personnel change which may result in new or additional exposure to lead, or whenever the company has any other reason to suspect a change which may result in new or additional exposures to lead, additional monitoring in accordance with this paragraph shall be conducted.

Written employee notification

The employer must notify each affected employee of the monitoring results performed within 15 working days. This can be done by either notifying each employee or by posting the results in an appropriate location that is accessible to the affected employees.

Whenever the results indicate that the employee exposure exceeds the permissible exposure limit (without regard to respirators), the employer shall include in the written notice a statement that the permissible exposure limit was exceeded and a description of the corrective action taken, or to be taken, to reduce exposure to or below the permissible exposure limit.

The company shall use a method of monitoring and analysis which has an accuracy (to a confidence level of 95%) of not less than plus or minus 20 percent for airborne concentrations of lead equal to or greater than 30 ug/m(3).

Revision Date: 2023 5



Engineering and work practice controls

No employee of the company is exposed to lead above the PEL for more than 30 days per year, therefore the engineering and work practice controls are not applicable.

Employees must adhere to all posted signs, labels, and/or assessment reports that indicate the presence of lead in the immediate environment.

Employees are not to disturb any lead containing materials without the proper PPE or training.

Written compliance program

The written compliance program is not applicable as the company does not meet or exceed the criteria mandating a written program.

Respiratory selection

For employees who use respirators required by this section, the company will provide certified respirators. In addition, when an employee requests a respirator the company will provide them with one even if their air exposure level does not exceed PEL.

IF a respirator becomes damaged or provides insufficient protection during work practices, **THEN** the employee(s) will stop work, vacate the area, and will not commence duties until a suitable replacement is provided.



Protective work Provision and Use:

Protective work clothing and equipment

If an employee is exposed to lead above the PEL, where the possibility of skin or eye irritation exist, the company will provide (at no cost to the employee) and assure that the employee uses the appropriate protective work clothing and equipment, such as but not limited to:

- coveralls or similar full body work clothing
- gloves, hats, and steel toed boots or disposable boot coverlets; and
- face shields, respirators, or other appropriate protective equipment

Cleaning and Replacement:

The company provides the protective clothing in this section in a clean and dry condition at least weekly, and daily to employees whose exposure levels without regard to a respirator are over 200 ug/m(3) of lead as an 8 hour TWA. The company's lead exposure program also includes:

- providing for the cleaning, laundering, or disposal of protective clothing and equipment required by this section
- repairing or replacing required protective clothing and equipment as needed to maintain their effectiveness
- providing that all protective clothing is removed at the completion of a work shift only in change rooms provide for that purpose
- assuring that contaminated protective clothing which is to be cleaned, laundered, or disposed of, is place in a closed container in the change room which prevents dispersion of lead outside the container
- informing in writing any person who cleans or launders protective clothing or equipment of the potentially harmful effects of the exposure to lead

The company will assure that the containers of contaminated protective clothing are label as follows:

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

The company prohibits the removal of lead from protective clothing or equipment by blowing, shaking, or any other means which disperses lead into the air.

Revision Date: 2023 7



Medical surveillance

The company's medical surveillance program for all employees who are or may be exposed above the action level for more than 30 days per year assures that all medical examinations and procedures are performed by or under the supervision of a licensed physician and will provide the required medical surveillance including multiple physician review without cost to employees and at a reasonable time and place.

Biological monitoring

Biological monitoring is not required as the engineering and work practice controls do not expose the employees at or above the PEL for more than 30 days within a year.

Employee notification

Within 5 working days after the receipt of biological monitoring results, the company will notify in writing each employee whose blood level exceeds 40 ug/100g:

- of that employees blood level; and
- temporary medical removal with medical removal protection benefits



Hygiene facilities and practices

The company shall ensure that in areas where employees are exposed to lead above the PEL, without regard to the use of respirators:

- food or beverage is not present or consumed
- tobacco products are not present or used
- cosmetics are not applied....

...except in change rooms, lunchrooms, and showers.

Change Rooms:

The company will provide clean change rooms for employees who work in areas where their airborne exposure to lead is above the PEL, without regard to the use of respirators, and the change rooms are equipped with separate storage facilities for protective work clothing and equipment and for street clothes which prevent cross contamination.

Showers:

The company shall assure that employees that work in areas where their airborne exposure to lead is above the PEL, without regard to the use of respirators, shower at the end of the work shift and provide shower facilities in accordance with 1910.141 OSHA standard.

In addition, the company will assure that employees who are required to shower do not leave the work place wearing any clothing worn during the work shift. Employees will be instructed to thoroughly wash hands and face if any contact or exposure to lead materials was made during their job task.



Signs General:

The company many use signs required by other statutes, regulations or ordinances in addition to, or in combination with, signs required by this program.

The company assures that no statement appears on or near any sign which contradicts or detracts from the meaning of the required sign.

PEL Warning Sign:

The company shall post the following warning signs in each work area where the PEL is exceeded:

WARNING

LEAD WORK AREA

POISION

NO SMOKING AREA

Company signs are required to be illuminated and cleaned as necessary so that the wording is readily visible.