



Policy No. 036
Policy Name: Lead Control
Control Date: 08/2006

1.0 Scope and Application

This policy has been developed to ensure that the hazards associated with lead and lead containing materials are minimized or eliminated to protect the safety and health of employees, the public, and the environment.

This policy complies with Chapter 32 (Public Employee Safety and Health) of the Wisconsin Administrative code as promulgated by the Wisconsin Department of Commerce and 29 CFR Part 1910.1025 (Lead) as promulgated by the U.S. Occupational Safety and Health Administration.

2.0 Responsibilities

Risk Manager: Support and management of this policy. Exposure monitoring.
Department Heads: Implementation of this policy. Develop control procedures.
Supervisors: Ensure policy is adhered to by all employees.
Employees: Follow policy requirements.

All employees are responsible for complying with the requirements contained in this policy. Failure to abide by these requirements may subject the employee to disciplinary action, up to and including discharge.

3.0 Departmental Polices and Requirements

This policy represents minimum requirements for any activities involving lead or lead containing materials and/or wastes. Department Heads shall develop specific Lead Control Procedures as specified in this policy for each operation involving an employee's exposure to lead or lead containing materials.

4.0 Definitions

Action Limit: The limit for lead of 30 ug/m³ (micrograms per cubic meter) for which actions are required if employee airborne exposures meet or exceed this value.

PEL: Permissible Limit: Set by OSHA, this is the maximum daily airborne exposure to lead that employees can be exposed to with having to implement engineering controls, personal protective equipment, etc. It is set at 50 ug/m³ (micrograms per cubic meter).

TWA: Time Weighted Average based on a standard 8-hour workday.



5.0 Training

Employees who work with lead or lead containing materials (e.g. paint, etc.) and are exposed to airborne lead concentrations at any level will receive copies of Appendix A and B of the OSHA lead standard. Employees who are exposed to lead above the OSHA action level or for whom the possibility of skin or eye irritation exists will receive training on an annual basis in the topics described in the OSHA lead standard.

6.0 Documentation Requirements

The results of all air monitoring tests and training records will be forwarded to the County Risk Manager. Documentation of annual respirator fit testing and respirator training shall all be documented as required.

7.0 Potential Sources Of Lead

The following sources may contain lead. This list is not all inclusive:

- Lead bullets, spent cartridges and floor sweepings from shooting range.
- Solder
- Painting (Spray, hand, scraping, etc.)
- Metals
- Welding Rods
- Batteries
- Sandblasting leaded paint

8.0 Exposure Assessment

Employee lead exposure monitoring shall be conducted to determine the employee's potential to exceed the OSHA lead action level. Identified activities will be monitored to determine actual exposure levels and to help in defining engineering, administrative or personal controls that may be warranted. Monitoring of every employee potentially exposed to lead is not required provided that the monitoring is representative of the activities performed by employees in the same job classification performing the same duties in regards to lead and lead containing materials.

- a) Employees will be notified in writing of the monitoring results within five (5) days of the receipt of the results from the laboratory. If the results indicate that the employee is exposed to lead above the PEL of 50 $\mu\text{g}/\text{m}^3$ on a TWA (8-hour) basis, then the notification will also include a description of corrective actions that have been or will be taken to reduce exposures.



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- b) No additional monitoring is required if the initial lead exposure monitoring shows that the employee is not exposed at or above the action limit of 30 ug/m³ unless work conditions or materials change. For employees who are exposed above the action limit
- c) Monitoring shall be repeated every six (6) months if exposure monitoring results show that the employee is exposed at or above the action limit of 30 ug/m³ but below the PEL of 50 ug/m³ on an 8-hour TWA basis. Monitoring may be discontinued if two (2) consecutive measurements, taken at least seven (7) days apart, are at or below the action level of 30 ug/m³.
- d) Monitoring shall be repeated every three (3) months if exposure monitoring results show that the employee is at or above the PEL of 50 ug/m³ on an 8-hour TWA. Monitoring must continue at three (3) month intervals until two (2) consecutive measurements, taken at least seven (7) days apart, are below the PEL of 50 ug/m³.
- e) Whenever there is a change in equipment, processes, controls or a new type of job is added that involves exposure to lead, additional air monitoring will be required.

9.0 Lead Control Procedures

Department Heads shall develop lead control procedures for any operation in which initial monitoring shows airborne lead exposures at or above the action limit of 30 ug/m³. These procedures shall specify all of the following and include the other pertinent requirements of this policy:

- a) A description of each operation in which lead is emitted; e.g. machinery used, material processed, controls in place, crew size, employee job responsibilities, operating procedures and maintenance practices.
- b) A description of the specific means that will be employed to achieve compliance, including engineering plans and studies used to determine methods selected for controlling exposure to lead.
- c) A report of the technology considered in meeting the permissible exposure limit.
- d) Air monitoring data which documents the source of lead emissions.
- e) A detailed schedule for implementation of the program, including documentation such as copies of purchase orders for equipment, construction contracts, etc.



10.0 Personal Protective Equipment

- a) If an employee is exposed to lead above the PEL, without regard to the use of respirators or where the possibility of skin or eye irritation exists, the County will provide at no cost to the employee and assure that the employee uses appropriate protective work clothing and equipment such as, but not limited to:
- Coveralls or similar full-body work clothing.
 - Gloves, hats, and shoes or disposable shoe coverlets.
 - Face shields, vented goggles, or other appropriate protective equipment.
- b) Personal protective clothing required in the above paragraph will be provided 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/m³ of lead as an 8-hour TWA.
- c) Facilities will be provided for the cleaning, laundering, or disposal of protective clothing and equipment.
- d) The Supervisor will repair or replace required protective clothing and equipment as needed to maintain their effectiveness.
- e) Supervisors shall ensure that all protective clothing is removed at the completion of a work shift only in change rooms provided for that purpose.
- f) Supervisors shall ensure that contaminated protective clothing which is to be cleaned, laundered, or disposed of, is placed in a closed container in the change-room which prevents dispersion of lead outside the container.
- g) Department Heads shall inform in writing any person who cleans or launders protective clothing or equipment of the potentially harmful effects of exposure to lead. Such communication shall first be approved by the County Risk Manager.
- h) Supervisors shall ensure that containers of contaminated protective clothing and equipment are labeled 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.



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- i) Procedures shall specify that the removal of lead from protective clothing or equipment by blowing, shaking, or any other means which disperses lead into the air is prohibited.

11.0 Housekeeping

- a) All surfaces shall be maintained as free as practicable of accumulations of lead.
- b) Floors and other surfaces where lead accumulates may not be cleaned by the use of compressed air.
- c) Shoveling, dry or wet sweeping, and brushing may be used only where vacuuming or other equally effective methods have been tried and found not to be effective.
- d) Where vacuuming methods are selected, the vacuums shall be used and emptied in a manner which minimizes the reentry of lead into the workplace.

12.0 Hygiene Facilities and Practices

- a) Employees who are exposed to lead above the PEL, without regard to the use of respirators, shall not have food or beverage present or consumed, tobacco products present or used, and cosmetics applied, except in change rooms, lunchrooms, and showers.
- b) Employees will be provided with clean change rooms whose work in areas where their airborne exposure to lead is above the PEL, without regard to the use of respirators.
- c) Change rooms must be equipped with separate storage facilities for protective work clothing and equipment and for street clothes which prevent cross-contamination.
- d) Employees who 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.
- e) Supervisors shall ensure that employees who are required to shower do not leave the workplace wearing any clothing or equipment worn during the work shift.
- f) Supervisors shall ensure that employees who work in areas where their airborne exposure to lead is above the PEL without regard to the use of a respirator wash their hands and face prior to eating, drinking, smoking or applying cosmetics.



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13.0 Medical Surveillance

- a) Employees who are or may be exposed above the action level for more than thirty (30) days per year shall be enrolled in a medical surveillance program to be managed by the Risk Manager.
- b) The medical surveillance program shall comply with the requirements of the OSHA lead standard.

14.0 Respirator Use

- a) All respirator use shall comply with the County's respirator policy.
- b) Employees exposed above the PEL of 50 ug/m³ for less than thirty (30) days per year are exempt from the respirator policy to have a medical examination prior to wearing a respirator. These employees are still required to undergo annual respirator fit testing and training.

15.0 Signs

- a) The employer shall post the following warning signs in each work area where the PEL is exceeded:

WARNING
LEAD WORK AREA
POISON
NO SMOKING OR EATING

16.0 Plan Review

This plan and all lead control procedures will be reviewed on an annual basis and updated as necessary. The review will be completed on the forms contained in the appendix.

End Policy