

SAFETY MEETING TOPIC

This form shall be completed and kept on file

Job Name _____ Location _____ Job No. _____
Meeting Leader _____ Title _____
Date Held _____ Place _____ Time _____
Subject of Meeting THE LEAD STANDARD SAFETY TALK

Lead is an extremely dangerous substance and a common problem facing the construction industry. Though the use of lead in coating materials is not as wide spread as it used to be, working in older structures may expose you to lead dust, especially when drilling, cutting or sanding surfaces painted with lead based paints.

Lead was addressed in the first set of standards established by OSHA. The standard identified over 120 occupations in general industry which expose workers to lead. In 1978 it was revised to increase worker protection. However, the lack of information on lead in Construction caused OSHA to exclude construction workers. In 1993 Congress passed legislation forcing OSHA to regulate the construction industry. Now all workers must be protected from lead hazards.

PERMISSIBLE EXPOSURE LIMIT (PEL), MONITORING AND ASSESSMENT

When employees are exposed to lead in any quantity, the standard requires their employer to make an initial determination as to the level of exposure. The determination may be made using existing information or through air monitoring. Air monitoring must represent the actual exposure employees would face. Sampling should cover a full shift and include representative exposure levels for various job types. Recent testing results from similar job activities or objective information from outside source may also be used. Employee complaints of symptoms of lead exposure must be considered in the determination.

The standard sets the permissible exposure limit (PEL) at 50 micrograms of lead per cubic meter of air (50 ug/m³). This is an average exposure limit for an 8 hour workday. Short exposures above the PEL are permitted as long as the average for 8-hours is not above the PEL. If the workday is longer than 8-hours, the average level must be reduced. A formula contained in the standard to reduce the PEL to a safe level. The standard also establishes an action level (AL). The AL is 30 ug/m³. The measurements and required actions are without regard to respirators. Contractors cannot avoid compliance with the standard by simply providing a respirator.

If initial determination shows potential exposure over the reaction level, an air monitoring program must be set up. Complete protection must be provided during air monitoring. Employees need to be notified in writing within 5 working days of monitoring results. They must also be notified if results indicate exposure above the PEL. The notification will include a description of the corrective actions that have been taken or will be taken to reduce exposure.

Air monitoring will be repeated every 3 months until 2 consecutive measurements, taken at least 7 days apart, are below the PEL, but above the AL. Monitoring will be conducted at

least every six months until 2 consecutive measurements, taken at least 7 days apart, are at or below the AL level. Additional monitoring must be done if changes occur.

METHODS OF COMPLIANCE

All contractors must try to reduce lead exposure through engineering and work practice controls. This includes administrative controls. However, these are usually not enough. They must often be supplemented with respiratory protection. All controls put in place should be contained in a Written Compliance Program. The program must be available to all employees. It will identify where lead exposure may occur and the steps taken to control exposure. In addition, the following elements of standard are addressed in the program.

- **Protective Work Clothing and Equipment** – Employers must provide clothing and equipment.
- **Housekeeping** – All surfaces must be kept as free of lead dust as possible.
- **Hygiene Facilities** – Facilities available to avoid contamination (eating rooms, etc.)
- **Medical Surveillance** – Exams and blood tests to ensure over exposure does not occur.
- **Information and Training** – Training which addresses the standard and hazard control.
- **Signs** – All areas where exposure may occur must be marked.

WARNING: LEAD WORK AREA – NO SMOKING OR EATING

- **Record Keeping** – Maintenance and employee access to records (monitoring, exams, etc.)
- **Observation of Monitoring** – The observation of monitoring by an employee or designee.

A separate program should be established to address the use of respirators. However, it may also be referenced in the lead program.