



Occupational Exposure to Lead – 1910:1025 Lead Policy

Scope

This policy applies to all occupational and student exposure to lead.

Purpose

The purpose of this policy is to protect the College Community from the adverse effects of lead exposure. Additionally, it is intended to maintain compliance with OSHA CFR 1910:1025.

Definitions

Lead means metallic lead, all inorganic lead compounds, and organic lead soaps. Excluded from this definition are all other organic lead compounds.

Uses On Campus

Lead is used in Chemistry, Art, and the Garage.

- Chemistry uses and inventories the following lead compounds:

Lead Acetate	Lead Sulfate
Lead Chloride	Lead (metal and foil)

These inorganic lead compounds are occasionally used in microscale inorganic analysis.

- Chemistry also has small amounts of lead wire, foil and grandulars also used in microscale inorganic lab.
- Art has small amounts of lead in glazes and pigments.
- The garage uses lead wheel weights and solder.

PERMISSIBLE EXPOSURE LIMIT(PEL): The PEL for lead is 50ug/m³ averaged over an 8 hour period. The action level for lead is 30 ug/m³ averaged over an 8 hour period.

Process

- EXPOSURE MONITORING:** The College will conduct exposure monitoring in the event of construction/demolition activities that could produce an exposure.
- EMPLOYEE NOTIFICATION:** The results of testing have been posted at appropriate locations within 15 days of receipt of those results, so that all affected employees/students have access to that information.
- METHODS OF COMPLIANCE:** All testing results have been below the action level so no engineering or administrative controls have been instituted. The College recommends and provides respiratory protection to all employees/students when there is a reasonable possibility that their exposure will exceed the action level.
- RESPIRATORY PROTECTION:** The College will follow OSHA 1910:134, the college policy on respiratory protection, and Table II – Respiratory Protection for Lead Aerosols in 1910:1025.
- HOUSEKEEPING:** All surfaces are maintained as free as practical of lead dust. Compressed air is not used to clean floors, counters, or other surfaces. HEPA vacuums will be used when cleaning floors, counters, and other surfaces.
- MEDICAL SURVEILLANCE:** Medical surveillance, including biological monitoring, will be provided if and when an employee is exposed to levels of lead that exceed the action level (30 ug/m³) for more than 30 days. Medical



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surveillance will include examinations and consultations. The results of which will be provided within 5 days to all affected employees whose blood lead levels exceed 40ug/100gm of blood.

7. **MEDICAL REMOVAL PROTECTION AND RETURN:** When an employee's blood lead level exceeds 60 ug/100g of blood they shall be removed from that job and given one where the exposure is below the action level. The employee shall not be returned to that job until two successive blood level tests indicate that their blood level is below 40 ug/100gm of blood. An employee removed from a job due to high blood levels shall be afforded the removal benefits specified in 1910:1025(k)(2).
8. **TRAINING PROGRAM:** Employees exposed to lead at any level shall be informed of the content of Appendix A – Substance Data Sheet for Occupational Exposure to Lead and Appendix B – Employee Standard Summary. This information shall be reviewed annually. The College will make available to all affected employees a copy of the lead standard and its appendices.
9. **SIGNS:** Signs are not required as long as the employee exposure levels do not exceed the Permissible Exposure Level (PEL).
10. **RECORDKEEPING:** Records and associated documentation will be maintained as follows:
 - a. **Exposure Monitoring** – Employee personal information, dates, times, sampling protocol and environmental variables. These records shall be maintained for a period of 20 years.
 - b. **Medical Surveillance** – All surveillance records relevant to an employee's exposure to lead, biological monitoring records, medical examinations and consultations, medical removal and return records, and medical removal benefits records. These records shall be maintained for 40 years.
 - c. The above records will be made available to employees that request them or their designated representative.

Responsibilities

1. **Employees**
 - a. Inform Safety when materials containing lead are purchased
2. **Safety**
 - a. Arrange for employee assessment when appropriate
 - b. Communicate results of testing to employees
 - c. Maintain assessment and medical records
 - d. Specify proper personal protective equipment

Evaluation

The Safety Committee shall be responsible for evaluating this policy annually.

Document History

Created: 4/2007

Audited: 4/2008

Revised: 4/2009, 4/2010, 4/2011

Audited: 4/2012