

Southern California Trade Contractors Association

Safety Newsletter

3rd Quarter, 2015

Lead in Construction

T8 CCR Section 1532.1 covers the requirements on lead safety in construction, and makes employers responsible for complying with those requirements. Employers can reduce the hazard from lead in construction by meeting these requirements and following industry best practices.

Why employers need to be concerned?

- Lead is highly toxic and it can cause damage to brain, kidney, reproductive system, etc.
- Lead poisoning occurs through ingestion or inhalation even at a very low level of exposure
- The risk to families, especially children, from take home lead, carried on employees' bodies, shoes or clothing is great

Benefits of controlling lead exposure

Consider the alternatives to failing to protect your employees from lead exposure: fines up to \$70,000 per violation, medical removal payments to workers with high blood lead levels, and costly job shutdowns. Some companies find that following the lead exposure regulations increases their business since clients want jobs that are safer for both workers and the environment.

What do I need to do to protect my employees from lead poisoning?

Assess lead exposure

Lead can be present in a wide range of materials including paints and other coatings, lead mortars, and base metals to be welded on or treated with abrasive blasting.

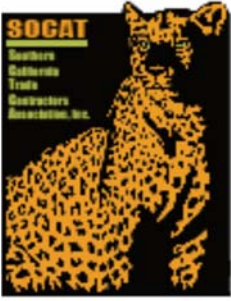
- Look at the age of the building or structure, the presence of coatings and other materials that may contain lead
- Ask the property owner for relevant information
- Also check the MSDS' of the materials in use to see if they contain lead

Send samples of materials to a laboratory for lead analysis. Laboratories accredited by the U.S. EPA National Lead Laboratory Accreditation Program are listed at www.epa.gov/lead/pubs/nallap.htm. Testing methods for lead must meet requirements of Title 8 Section 1532.1(d)(9).

Regularly assess the exposure level

Employers must assess the amounts of lead breathed by workers on a regular basis for each task as per Section 1532.1(d). This is usually done by employee breathing zone air sampling. Air sampling results are used to determine the protective measures needed as well as the type of respirator that must be worn for protection.

Have a written compliance program



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Prior to starting the job, you shall establish and implement a written compliance program as per 1532.1(e). In addition, you need to provide a written Pre-Job Notification to the nearest Cal/OSHA office within 24 hours of start of the work. The notification can also be made online at <http://www.dir.ca.gov/dosh/Permits.html>. See section 1532.1(p) for details on required information and types of jobs covered.

Reduce and maintain low lead level

On all construction jobs where lead is present, the employer should reduce and maintain lead levels as low as possible by:

- **Housekeeping.** Lead dust on surfaces, especially in eating areas, must be controlled by HEPA vacuuming, wet clean-up, or other effective methods.
- **Hand and face washing.** Workers must have washing facilities with soap and clean water.
- **Training.** Workers must receive training on lead hazards and how to protect themselves including:
 - Requirements of Section 1532.1
 - Nature of the operations – scraping, demolition etc.
 - Respiratory protection
 - Medical surveillance and removal
 - Engineering controls – vacuum with HEPA filter, etc.
 - Good work practices – eat in area free of lead, etc.
 - Let employees know of their rights to their records
 - Notify employees in writing of the blood-lead test results within 5 days of receiving the results
- **Using proper respirators.** For certain highly hazardous tasks, called trigger tasks, special protective measures must be taken – including specified respirators – until the employer determines that worker airborne exposures to lead are below levels specified in Section 1532.1
 - **Level 1 trigger tasks** – Any of the following with lead-containing coatings or materials: spray painting, manual demolition, manual scraping or sanding, use of heat gun, power tool cleaning with dust collection system. Minimum required respirator: half-mask respirator with N-100, R-100 or P-100 filters.
 - **Level 2 trigger tasks** – Any of the following lead-containing coatings or materials: using lead-containing mortar, lead burning, rivet busting, power tool cleaning without dust collection system, clean-up activities using dry expendable abrasives blasting enclosure movement or removal. Minimum requirement respirator: air-supplied hood or helmet, or loose fitting hood or helmet powered air purifying respirator with N-100, R-100 or P-100 filters.
 - **Level 3 trigger tasks** – Abrasive blasting, welding, cutting, or torch burning on structures where lead-containing coatings or materials are present. Minimum required respirator: half-mask supplied air respirator operated in a positive pressure mode. The Pre-Job Notification is required for all jobs involving trigger tasks.
- **Provide interim protective measures.** Followings are the interim protective measures required for all trigger tasks until worker airborne exposures are shown to be below levels specified in Section 1532.1:
 - Respirators, protective equipment and clothing
 - Areas for clothes changing and hand washing
 - Blood test for lead and zinc protoporphyrin (ZPP)



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- **Posting warning signs.** Section 1532.1(i)(6) requires regulated areas with warning signs for all trigger tasks and any other tasks that may reasonably cause hazardous lead exposure at or above the Permissible Exposure Limit (PEL).

Where can I get help? The Cal/OSHA Consultation Service helps employers at no cost. Employers can request an industrial hygienist to come to a construction job site, show how air sampling is done and assist in employee training. The Consultation Service is independent of Cal/OSHA's Enforcement Unit.

Resources

T8 CCR1532.1 http://www.dir.ca.gov/title8/1532_1.html

CDPH, Occupational Lead Poisoning Prevention Program Website: www.cdph.ca.gov/programs/olppp CA Toll Free 1(866)627-1587

Painting and Decorating Contractors of America Website: www.pdca.org Phone: (703)383-0800

SSPC: Society for Protective Coatings Website: www.sspc.org Phone: (412)281-2331

US EPA: Lead in Paint, Dust, and Soil Website: www.epa.gov/opptintr/lead Phone: (800)424-LEAD

OSHA: Lead in Construction

<http://www.osha.gov/Publications/osha3142.pdf>

http://www.osha.gov/OshDoc/data_Hurricane_Facts/lead_in_construction.pdf

http://www.osha.gov/OshDoc/data_Hurricane_Facts/lead_hazards_fs.pdf

**For more complete information:
OSHA U.S. Department of Labor
www.osha.gov**

**Mark Hebson, Administrator
22925 Arlington Ste. #1
Torrance, CA 90501
Visit our website at www.socattrade.org**