



COMPANY HEALTH & SAFETY PROGRAM

Issue: A
Date: 4/20/2009
Rev: 3
Date: 11/14/17
Authorized: **MJM**

Title: Lead Policy

Section No: 23

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1.0 **PURPOSE**

The purpose of this section is to communicate to employees and other interested persons that this company is not in the business of abating lead hazards, or of working with lead or lead containing materials. PPP will subcontract all lead abatement to licensed contractors.

2.0 **SCOPE**

This section provides a general means by which this company intends to keep employees safe from lead hazards and be in compliance with regulatory standards. Procedures other than provided in this section will require a site specific lead compliance plan.

3.0 **INDEX TO SECTION**

- 1.0 Purpose
- 2.0 Scope
- 3.0 Index to Section
- 4.0 Overview
- 5.0 Procedures
- 6.0 Responsibilities

4.0 **OVERVIEW**

PPP intends to comply with 29 CFR 1926.62 by ensuring that no employee is exposed to lead at concentrations greater than 50 micrograms per cubic meter of air averaged over an eight hour period.

This shall be accomplished by:

1. Hazard communication;
2. Required and prohibited work practices; and
3. Hazard awareness training.

Exposures to lead containing materials on construction sites may occur from leaded paints, leaded solders, pipes, batteries, circuit boards, cathode ray tubes, leaded glass, and demolition/salvage materials.



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Common symptoms of acute lead poisoning are loss of appetite, nausea, vomiting, stomach cramps, constipation, difficulty in sleeping, fatigue, moodiness, headache, joint or muscle aches, and anemia. Long term (chronic) overexposure to lead may result in severe damage to the blood-forming, nervous, urinary, and reproductive systems.

5.0 PROCEDURES

General procedures are as follows:

1. When communication of potential lead hazards on a jobsite is received it shall be determined by qualified people whether or not a hazard actually exists prior to PPP employees being directed further in the suspect areas.
2. A site specific compliance program will address means of engineering & work practice controls, air monitoring, a description of each operation in which lead is emitted, this written program will be revised & updated annually.
3. If PPP is the responsible contractor for having exposure assessments made or abatement work done, the work will be subcontracted to a company licensed to do such work with properly trained and qualified people.
4. If PPP employees working immediately adjacent to a lead abatement activity are exposed to lead due to the inadequate containment of such job, PPP will remove the employees from the area until the enclosure breach is repaired or perform an initial exposure assessment.
5. When known lead hazards exist on a jobsite, PPP shall:
 - a. Inform affected employees of Appendices A & B of the regulation. Train all affected employees with initial lead safety training and thereafter have annual lead safety refresher training programs. Employees will be informed of the specific nature of the operations which could result in exposure to lead above the action level, the purpose, proper selection, fitting, use, and limitation of respirators, engineering controls, purpose and a description of the medical surveillance program and the medical removal policy.



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- b. Lead awareness training will be documented including dates of training, employee name, and trainer name.
 - c. Signage shall be posted in and around the regulated work area with information covering the nature of the hazard, warnings, restrictions, work practices and necessary PPE.
 - d. Employees must abide by all signs/labels/assessment reports indicating the presence of lead containing materials.
 - e. Appropriate work practices will be followed to ensure the lead containing materials are not disturbed.
 - f. Prohibit **unauthorized** employees from entering controlled areas where lead work is being performed;
 - g. Allow employees to enter only areas that have been deemed safe or abated by a qualified person through means of exposure assessments and monitoring. **Full shift personal exposure samples shall be representative of the employee's regular, daily exposure to lead. No employee is to be exposed to lead at concentration greater than fifty micrograms per cubic meter of air averaged over a 8-hour period; and**
 - h. Require employees to report to their supervisor immediately any suspicions of potentially hazardous lead containing materials in their work areas.
 - i. **If an employee comes in contact with lead containing materials employee will wash hands and face as soon as feasible. PPP shall provide decontamination and changing facilities. Hygiene facilities will also be provided.**
6. **While it is PPP's policy not to expose any of our employees to lead hazards or implement lead producing process, the following**



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procedures will be adhered to and stated for compliance with regulatory requirements.

- a. If the initial determination or subsequent air monitoring reveals that an employee exposure to be at or above the action level but below the permissible exposure limit PPP shall repeat air personal monitoring at least every 6 months. PPP shall continue air 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 PPP will discontinue monitoring for that employee.
- b. When exposures are above the PEL, Lunch room, hygiene, shower, and changing facilities will be provided.
- c. Affected employees will be notified of the results of any monitoring performed within 15 working days, either individually in writing or by posting the results in an appropriate location that is accessible to affected employees.
- d. Whenever the results indicate that the representative employee's exposure, without regard to respirators, exceeds the permissible exposure limit. The notice shall include 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.
- e. Respirators with proper cartridges will be provided at no cost to the employee when it is necessary to install or implement engineering or work practice controls, when engineering and work practice controls are insufficient and in emergencies.
- f. Employees will be provided at no cost, PPE such as gloves, hats, vented goggles, shoes or disposable shoe covers. Protective clothing shall be cleaned and laundered at least weekly. Clothing shall also be properly disposed and repaired or replaced as necessary.
- g. Employees who are or may be exposed above the action level for more than 30 days shall be afforded Medical examinations & procedures by or under the supervision of a licensed physician,



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without cost to the employees. Blood sampling & monitoring will be conducted every 6 months until two consecutive blood samples & analysis are acceptable. The sampling & monitoring will be performed at least monthly during the removal period.

- h. Any employee with elevated blood levels will be temporarily removed from the exposure site and provided medical removal benefits.
- i. Employees will be notified in writing within five days when it is known that their lead levels are not acceptable.

6.0 RESPONSIBILITIES

Responsibilities are as follows:

1. It is every employee's responsibility to report suspicions of lead in the workplace.
2. The PPP project supervisor shall enforce required and prohibited work practices and communicate known hazards and potential hazards to employees, the project manager, the safety director, subcontractors and the vice president of operations.
3. The PPP safety director shall provide training when required as per this section



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REVISION HISTORY

Revision number	Description of change	Written by	Checked by	Effective date
1	5.0 2. Site specific 5.0 5. a.-g. Train affected employees 5.0 6. a.-i.	George Newton	Safety	02/8/2011
2	4.0 Exposures to lead containing materials..... 5.0 4.If PPP employees working..... 5.0 5. b. b.d.e.i. Lead awareness training..... 7.0 Revision History	George Newton	Safety	3/11/2012
	Program reviewed		GMN	4/16/2014
3	Revised 5.0.A and 5.0.5 i	Mike McCaffrey	Safety	11/14/17