

CITY OF APPLETON HUMAN RESOURCES POLICY	TITLE: LEAD POLICY	
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POLICY

The City of Appleton is committed to providing a safe and healthy work environment for all our employees. In addition, the City of Appleton's goal is to comply with the OSHA Lead Standards 29 CFR 1910.1025 & 1926.62, incorporated by reference in SPS 332.15.

PURPOSE

The purpose of the lead policy is to inform employees of the potential hazards of working with lead, limit exposure to lead, and establish procedures for working with lead. This policy is not intended to address community or public health exposures related to lead or lead based paint regulated under Wisconsin Department of Health Services (DHS) Chapter 162 and 254.

SCOPE

The City of Appleton shall ensure that all lead disturbing activities involving facilities or equipment is to be done in accordance with this policy to maintain employee or occupant exposures below the established permissible exposure limit of 50 ug/m³ (defined as units for the amount of chemical vapors, fumes, or dust in the ambient air) calculated over a time weighted average of 8 hours. This policy also applies to exposures to lead at or above the action level 30 ug/m³. Lead exposure related to the use of the Appleton Police Department indoor firearms range are covered the Police Department Facility Control, Maintenance and Use of Department Equipment policy.

AUTHORITY AND RESPONSIBILITY

The lead program administrator is the Director of Parks Recreation & Facility Management. The implementation of this program shall be the responsibility of the program administrator and the various departments to which it applies.

The program administrator is responsible for:

- Responding to sampling requests or employee inquiries;
- Performing frequent and regular inspections of job sites, materials, and equipment;
- Conducting air monitoring for employees to establish exposure levels for each activity type if requested;
- Disclosing sample results
- Procuring services of licensed lead abatement contractors for work activities.
- Disclosing the presence of lead to any outside contractors conducting work activities which will involve the disturbance of lead.
- Notifying the building occupants of any lead abatement activities.

Supervisors are responsible for:

- Notifying all employees of the purpose and intent of the Lead Policy and procedures;
- Conducting periodic inspections of job sites to ensure appropriate procedures and work practices are being followed;
- Assuring that all employees are trained in the procedures;
- Contacting the program administrator for lead based paint testing and procurement of lead abatement contractors; and
- Contacting the program administrator when there is a production, process control, or personnel change which may result in new or additional exposure.

Employees are responsible for complying with the procedures identified in this policy.

Contractors and sub-contractors are responsible for complying with the Occupational Safety and Health Administration's (OSHA) Standard's 29 CFR 1926.62 and 29 CFR 1910.1025, WI DHS Chapter 254, Environmental Health; WI DHS Chapter 163, Certification for Identification, Removal and Reduction of Lead Based Paint Hazards and the appropriate sections of this policy.

LEAD INVENTORY AND DESCRIPTION

The City of Appleton is not aware of any lead hazards in any of the City's facilities, but if lead is discovered, the City will prepare a written inventory for the facilities. Typical exposures may include welding, sanding, cutting, or otherwise disturbing lead or lead containing materials. Also, sand blasting bridges, vehicle maintenance, and maintaining playground equipment installed prior to 1980. The inventory shall be reviewed by the program administrator to determine how exposures should be addressed. The program administrator will maintain a master file of inventories by facility as appropriate.

This inventory list should include the description of the operation; e.g. machinery used, material processed, controls in place, crew size, employee job responsibilities, operating procedures and maintenance practices. The specific means for controlling the lead exposure shall also be identified.

LEAD IDENTIFICATION

The following warning signs shall be posted in each work area where an employee's exposure to lead is above the PEL.

DANGER

LEAD

MAY DAMAGE FERTILITY OR THE UNBORN CHILD

CAUSES DAMAGE TO THE CENTRAL NERVOUS SYSTEM

DO NOT EAT, DRINK OR SMOKE IN THIS AREA

These signs shall be illuminated and cleaned as necessary so that the legend is readily visible. Signs that contradict or detract from the meaning of the sign are prohibited.

PERSONAL AIR SAMPLING

OSHA has an Action Level for lead of 30 micrograms per cubic meter of air (30 ug/m³) averaged over an 8-hour period. The Permissible Exposure Limit (PEL) is 50 ug/m³ over an 8-hour period. When employees are exposed above the Action Level or PEL, OSHA has requirements for worker protection outlined in the lead standard 1910.1025(d).

This standard states exposure monitoring frequency should be as follows:

- If the initial monitoring reveals employee exposure to be below the action level the measurements need not be repeated unless there has been a production, process, control or personnel change which may result in new or additional exposure to lead, or whenever the employer has any other reason to suspect a change which may result in new or additional exposures to lead.
- If the exposure is at or above the Action Level but below the Permissible Exposure Limit (PEL) then monitoring shall be conducted at least every 6 months. This monitoring should continue until at least two consecutive measurements, taken at least 7 days apart, are below the action level at which time the employer may discontinue monitoring for that employee.
- If the exposure is above the Permissible Exposure Limit (PEL) then monitoring shall be conducted quarterly. This monitoring should continue until at least two consecutive measurements, taken at least 7 days apart, are below the action level at which time the employer may revert to conducting tests at least every 6 months. This monitoring should continue until at least two consecutive measurements, taken at least 7 days apart, are below the action level at which time the employer may discontinue monitoring for that employee.

The areas that require protection should be identified and proper Personal Protective Equipment (PPE) should be provided. Results of testing should be maintained.

Exposure records must be maintained for 30 years and medical records for the duration of employment plus 30 years. First aid records and experimental toxicological research records are excluded from the 30-year retention requirements.

AIR APPARATUS TESTING

On an as needed basis, air exchange equipment should be tested and inspected. Consider using an HVAC technician to assist in this process. Verify that the unit is providing an acceptable amount of air exchanges. Testing results should be maintained.

LEAD ABATEMENT PROJECTS

All lead abatement projects within the City of Appleton shall be performed under controlled conditions by a certified lead abatement contractor. All abatement project documents and contractor's certification documents will be maintained in the Parks, Recreation, and Facilities Management Department.

EMPLOYEE TRAINING

All City of Appleton employees exposed to lead at or above the action level (30mg/m³) or who may suffer skin or eye irritation from lead compounds must be trained prior to initial assignment to areas where there is a possibility of exposure at or above the action level. Annual training is required thereafter unless further exposure at or above the action level will not occur. The training shall cover:

- The content of the 1910.1025 & 1926.62 standards and its appendices
- Specific hazards related to their work environment – including locations and potential sources of lead exposures in the buildings/facilities
- The purpose, proper selection, fitting, use, and limitations of respirators
- The purpose and description of the medical surveillance program
- The engineering controls and work practices associated with employee's job assignment
- Contents of compliance plans in effect
- Instructions to employees that chelating agents (these agents remove certain heavy metals from the bloodstream) should not be routinely used to remove lead from their bodies
- Protective measures which can be taken
- Potential health effects associated with lead exposure
- Their rights under the standards

OUTSIDE SERVICE CONTRACTOR INFORMATION

All outside service contractors will be notified of the presence of lead-containing materials prior to beginning work activities. When contractors are required to work in areas where lead is present or there is a possibility of disrupting lead-containing materials, the City of Appleton will provide:

- Notification of the known locations of lead present (or suspected to be present) in the area where the contractor will work.

Contractors should contact the lead program administrator in the event that suspected lead-containing materials are discovered during work activities.

EMERGENCY RELEASE/DISTURBANCE

The lead program administrator shall be notified of any activities performed by the City of Appleton employees that could result in the disturbance of suspected or confirmed lead containing materials.

All emergency lead work shall be conducted by a currently licensed lead abatement contractor. Emergencies include situations where a rapid response is necessary to mitigate damage or prevent further serious damage to the building or its occupants in which lead containing or suspected lead containing material has become damaged and has the potential to become airborne.

*In case of an emergency, immediately contact the lead program administrator.

HYGIENE

Eating, drinking, applying cosmetics, smoking, or chewing tobacco is prohibited in work areas where there is lead exposure or a potential for lead exposure. The City of Appleton will provide space away from the work area where the employee can eat and drink. The City of Appleton will also provide employees with facilities to wash their hands and face. If an employee should ever be exposed above the PEL the employee will be provided a place to shower and change in and out of their work clothes.

MEDICAL SURVEILLANCE AND MEDICAL REMOVAL

City of Appleton employees who are exposed at or above the action level (30 ug/m^3) for more than 30 days per year must receive blood tests, a medical exam and consultation. Blood sampling and analysis for lead and zinc protoporphyrin levels will be conducted at least every 6 months for each employee that is exposed as described above.

A medical examination and consultation shall be made available upon initial assignment to an area at or above the action level for lead, whenever the employee notifies the employer that they have developed signs and symptoms of lead intoxication, or at least annually for each employee that is exposed at or above the action level for more than 30 days per year for whom a blood sampling test conducted at any time during the preceding 12 months indicated a blood lead level at or above 30 ug/m^3 .

If the employee's blood level reaches 40 ug/m^3 they will be tested every two months. This frequency shall continue until two consecutive blood samples and analyses indicate a blood lead

level below 40 $\mu\text{g}/\text{dl}$ of whole blood. If the employee's blood lead level is at or above 50 ug/m^3 , they will be tested again within two weeks.

The City of Appleton will remove the affected employee from exposure to lead if their blood lead level is still at or above 50 ug/m^3 on the second test or if it is necessary for other medical reasons.

Within 5 working days after the receipt of biological monitoring results, the City of Appleton shall notify in writing each employee whose blood lead level is at or above 40 ug/m^3 .

HOUSEKEEPING

Vacuum cleaners with HEPA filters (high-efficiency particulate) are recommended. Wet mopping and other cleaning methods that keep dust from getting into the air shall be used. Dry sweeping or shoveling should be avoided. Compressed air should not be used to clean.