



Lead Policy

CITY OF APPLETON POLICY		SECTION:	Safety
ISSUE DATE:	May 2007	LAST UPDATE:	October 2025
POLICY SOURCE:	Human Resources Department		
POLICY AUDIENCE:	All Employees and Volunteers		

I. POLICY

This lead policy was developed to prevent employee exposure to hazardous levels of lead that could result through various maintenance and construction activities as well as from the use of our firearm range. This program is intended to meet the requirements of Occupational Safety and Health Administration's ("OSHA") lead construction standard (29 CFR 1926.62) and their lead general industry standard (29 CFR 1910.1025) which have both been adopted by the Wisconsin Department of Safety and Professional Services ("WI DSPS") Wis Stat. § 101.055 (2021-22).

II. 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 Lead Safety Program.

III. SCOPE

The City of Appleton ("City") is committed to providing a safe work environment for its employees. This commitment includes ensuring every reasonable precaution is taken to protect our employees (and others) from the adverse health effects associated with exposure to lead. The procedures set forth in this policy are to be adhered to by all City employees. Lead exposures related to the use of the Appleton Police Department indoor firearms range and weapons maintenance room are briefly covered in this policy but is covered more fully in the Police Department's "Facility Control, Maintenance and Use of Department Equipment" Policy.

IV. Definitions

- A. Action Level: employee exposure, without regard to the use of respirators, to an airborne concentration of lead of 30 micrograms per cubic meter of air (30 µg/m³) averaged over an 8-hour period or time weighted average ("TWA").
- B. Permissible Exposure Limit ("PEL"): airborne concentration of lead greater than 50

micrograms per cubic meter of air ($50 \mu\text{g}/\text{m}^3$) averaged over an 8-hour period or time weighted average ("TWA").

V. Responsibilities

- A. Department Directors, Deputy Directors, and Supervisors:
 - Provide support, where needed, to properly implement the exposure control work practices outlined in this policy.
 - Collaborate with Human Resources Department, as needed, with conducting any lead exposure sampling/monitoring.
 - Notify the Human Resources Department when there is a production or process change which may result in new or additional exposures to lead.
 - Conduct periodic inspections of job sites and work areas to ensure exposure control work practices are being followed.
 - Work with licensed lead abatement contractors for any lead material removal activities, as needed.
 - Ensure applicable employees have received training in the hazards of lead exposure and the work practices to reduce exposure.
- B. Employees are responsible for complying with the exposure control work practices identified in this policy.
- C. Note: Applicable contractors and subcontractors are responsible for complying with OSHA's applicable Lead Safety Standards (29 CFR 1910.1025 and 29 CFR 1926.62).

VI. Lead Inventory & Industrial Hygiene Air Sampling/Monitoring

The following work processes have been identified as involving lead and possible lead hazard exposure:

- Lead service pipe removal by the Department of Public Works ("DPW") employees.
- Use of the indoor shooting range by APD employees.
- Maintenance and cleaning operations in APD's weapons maintenance room.
- Paint maintenance of city fire hydrants by DPW employees.
- Removal of lead paint from within city buildings. The City of Appleton is not aware of any city facilities that might contain lead paint, but if lead paint containing surfaces are discovered, the City will prepare a written inventory of these locations. Any lead paint abatement operations will be performed by a certified lead abatement contractor. Records of any removal of lead paint should be forwarded to the City Risk Manager for retention purposes.

Industrial hygiene ("IH") lead air sampling and monitoring has been conducted on the above work processes involving city employees. The results of this sampling and monitoring are well below both OSHA's action level limits and permissible exposure limits for lead. As such, the City of Appleton does not need to repeat air sampling and monitoring for these specific tasks unless there is a change in production, processes or controls which may result in new or additional exposures to lead or if we have any other reason to suspect a change which

might result in new or additional exposure to lead.

Appendix A provides additional information on the results of this sampling and monitoring and includes operating procedures and maintenance practices for controlling lead exposure. Records of IH sampling and monitoring will be kept for a minimum of 30 years.

VII. Medical Monitoring and Surveillance

OSHA requires medical monitoring and surveillance (periodic blood sampling and medical evaluation) be made available to any employee that is exposed to lead above the action level limit for 30 days or more each year. No city employee falls within the scope of this requirement based on previous industrial hygiene air sampling and monitoring results. Therefore, the City does not need to abide by this requirement.

VIII. Employee Training

Affected employees will receive training on the hazards of lead exposure as well as the operating and maintenance practices for controlling lead exposure. This training shall include, but is not limited to, the following:

- Background information on lead.
- Health hazards of lead and ways it can enter the body.
- Effects of overexposure to lead (acute and chronic effects).
- OSHA's action limit level and permissible exposure limit level for lead.
- Industrial hygiene air monitoring and sampling results for city process involving lead exposure and employee access to these results.
- Protective measures to protect against lead exposure including mechanical ventilation, housekeeping practices, hygiene practices, personal protective equipment, etc.
- OSHA's medical monitoring and surveillance requirements and the City's exemption to it.

IX. Annual Review

This policy will be reviewed at least annually, as required under CFR 1910.1025, and updated as necessary to reflect the status of our operations as it relates to lead exposure(s).

X. Appendices

- Appendix A – Previous Lead Air Sampling and Monitoring Results for City of Appleton Operations and Work Processes (Note: copies of the full air sampling reports can be requested from the Human Resources Department.)

COA Previous Lead Air Sampling and Monitoring Results & Lead Exposure Controls

Sample Date	Task Sampled	Sample Results	Lead Exposure Controls
7/13/2023	Lead Water Service Pipe Removal (DPW)	No significant airborne lead exposure.	Use only loppers to cut lead service pipe. Use disposable gloves when cutting lead pipes. Immediately, use commercial lead-removal wipes on the lopper handles, any other tools and employee hands and before touching any other hard surfaces (steering wheel, truck storage areas, etc.).
10/18/2023	Firearm Use at APD's indoor shooting range – Sample 1.	8-hour TWA: 20% of OSHA's PEL and 33% of OSHA's Action Level.	Utilize mechanical ventilation system within shooting range. During cleanup of spent casings, avoid shoveling, dry sweeping as this creates airborne dust.
10/18/2023	Firearm Use at APD's indoor shooting range – Sample 2.	8-hour TWA: 8% of OSHA's PEL and 13% of OSHA's Action Level.	Utilize mechanical ventilation system within shooting range. During cleanup of spent casings, avoid shoveling, dry sweeping as this creates airborne dust.
10/18/2023	Firearm Use at APD's indoor shooting range – Sample 3 (Range Officer).	8-hour TWA: 8% of OSHA's PEL and 13% of OSHA's Action Level.	Utilize mechanical ventilation system within shooting range. During cleanup of spent casings, avoid shoveling, dry sweeping as this creates airborne dust.
10/18/2023	Weapons Cleaning and Maintenance (APD's Weapon Maintenance Room)	No significant airborne lead exposure.	After cleaning and performing maintenance operations on weapons, use commercial lead-removal wipes and wipe down surfaces where firearms were handled. Wash hands and if exposed, forearms.
7/7/2025	Fire Hydrant Paint Blasting (DPW) – Sample 1	8-hour TWA: 7.4% of OSHA's PEL and 12% of OSHA's Action Level.	Continue to use water during this task to control airborne dust exposure.
7/7/2025	Fire Hydrant Paint Blasting (DPW) – Sample 2	8-hour TWA: 7.4% of OSHA's PEL and 12% of OSHA's action level.	Continue to use water during this task to control airborne dust exposure.