

LEAD IN CONSTRUCTION UPDATE – STATUS IN CALIFORNIA

CIHC Professional Development Seminar

San Diego, CA

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Cal/OSHA's Lead in Construction Standard



Title 8, CCR Section 1532.1

Covers all construction work where an employee may be exposed to lead, including metallic lead, inorganic lead compounds and organic lead soaps, but not organic lead compounds.

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- No further advisory meetings are anticipated.
- **DOSH expects to send the formal rulemaking package to the OSH Standards Board in early 2017.**

CDPH OLPPP BACKGROUND

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- HEALTH-BASED RECOMMENDATIONS TRANSMITTED TO CAL/OSHA IN JUNE 2010.

CDPH OLPPP BACKGROUND

- KEY FINDINGS ASSOCIATED WITH BLOOD LEAD LEVELS (BLLs) $\geq 10 \mu\text{g}/\text{dL}$.
 - HIGH BLOOD PRESSURE
 - DECREASED KIDNEY FUNCTION
 - LOWER BIRTH WEIGHT
 - HEART DISEASE
 - MALE REPRODUCTIVE EFFECTS
 - DECREASED BRAIN FUNCTIONS
 - DEPRESSION AND ANXIETY

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- TOOK OEHHA ABOUT 2 YEARS TO COMPLETE ITS PHARMACO-KINETIC DETERMINATION

DOSH DISCUSSION DRAFT

11/10/15

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- **ABRASIVE BLASTING PEL FOR 5 YEARS: $25\mu\text{g}/\text{m}^3$**

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- LEVEL 1 TRIGGER TASK – PRESUMED UP TO 10 X PEL
- LEVEL 2 TRIGGER TASK – PRESUMED UP TO 50 X PEL
- LEVEL 3 TRIGGER TASK – PRESUMED >50 X PEL
– ADDS SHOWER FACILITIES REQUIREMENT

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- INITIAL EXPOSURE DETERMINATION
> AL < 30 $\mu\text{g}/\text{m}^3$: MONITOR EVERY 12 MONTHS UNTIL AT LEAST 2 CONSECUTIVE MEASUREMENTS AT LEAST 7 DAYS APART ARE < AL. THEN MAY DISCONTINUE UNTIL CHANGES OCCUR.

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- IF $\geq 30 \mu\text{g}/\text{m}^3 \leq 50 \mu\text{g}/\text{m}^3$: MONITOR EVERY 6 MONTHS UNTIL AT LEAST 2 CONSECUTIVE MEASUREMENTS AT LEAST 7 DAYS APART ARE $< 30 \mu\text{g}/\text{m}^3$, THEN MAY DISCONTINUE UNTIL CHANGES OCCUR.

- IF $> 50 \mu\text{g}/\text{m}^3$: MONITOR QUARTERLY UNTIL AT LEAST 2 CONSECUTIVE MEASUREMENTS AT LEAST 7 DAYS APART $\geq 30 \mu\text{g}/\text{m}^3 \leq 50 \mu\text{g}/\text{m}^3$: THEN MEASURE EVERY 6 MONTHS.

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- **METHOD OF MONITORING: 95% CONFIDENCE \pm 20% FOR CONCENTRATIONS $\geq 2 \mu\text{g}/\text{m}^3$.**

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- METHOD OF MONITORING: 95% CONFIDENCE $\pm 20\%$ FOR CONCENTRATIONS $\geq 2 \mu\text{g}/\text{m}^3$.
- WRITTEN COMPLIANCE PROGRAM TO INCLUDE A REPORT OF ENGINEERING AND WORK PRACTICE CONTROLS CONSIDERED BUT NOT IMPLEMENTED AND HOW THEY WERE DETERMINED TO NOT BE FEASIBLE.

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- HEPA FILTERS FOR PAPRS

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- HEPA FILTERS FOR PAPRs
- N-100, R-100 OR P-100 FILTERS FOR APRs
- PROTECTIVE CLOTHING $> 30 \mu\text{g}/\text{m}^3$
(currently $200 \mu\text{g}/\text{m}^3$)

- HYGIENE FACILITIES, PRACTICES AND REGULATED AREAS.
 - OCCUPATIONAL LEAD EXPOSURE (NOT OTHERWISE DEFINED)

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- **HYGIENE FACILITIES, PRACTICES AND REGULATED AREAS.**
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- **CLEANING OF HYGIENE FACILITIES**
 - MAINTAIN CLEANLINESS (NO SURFACE CRITERIA)

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- CLEANING OF HYGIENE FACILITIES
 - MAINTAIN CLEANLINESS (NO SURFACE CRITERIA)
- MEDICAL SURVEILLANCE PROGRAM
 - SOME MINOR TIMING CHANGES
 - MORE THAN 10 DAYS/YR (CURRENTLY 30 DAYS)

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- PROVIDE DEMOGRAPHIC INFO TO LICENSED HEALTH CARE PROVIDER

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- ROUTINE ZPP TESTING ELIMINATED
- BLLs:
 - INITIALLY
 - EVERY 2 MONTHS FOR 1ST 6 MONTHS AFTER INITIAL PLACEMENT AND AFTER ANY CHANGE IN TASK RESULTING IN HIGHER EXPOSURE AND THEN EVERY 6 MONTHS THEREAFTER.
 - $\geq 10 \mu\text{g/dL} < 20 \mu\text{g/dL}$ (currently $40 \mu\text{g/dL}$) AT LEAST EVERY 2 MONTHS UNTIL 2 CONSECUTIVE AT LEAST 30 DAYS APART ARE $< 10 \mu\text{g/dL}$ (currently $40 \mu\text{g/dL}$)

- BLLs:
 - $\geq 20 \mu\text{g}/\text{dL}$ AND DURING REMOVAL PERIOD:
MONTHLY
 - LEVEL 3 TRIGGER TASK: MONTHLY AND 3
DAYS AFTER.
 - $> 500 \mu\text{g}/\text{m}^3$ AIRBORNE EXPOSURE:
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- MODIFICATIONS IN EMPLOYEE NOTIFICATION REQUIREMENTS

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- **BLL TESTING VIA OSHA LISTED LAB.**
- **MODIFICATIONS IN EMPLOYEE NOTIFICATION REQUIREMENTS**
- **MEDICAL EXAMS PRIOR TO ASSIGNMENT AND ANNUALLY.**

- MEDICAL REMOVAL
 - LAST BLL $\geq 30 \mu\text{g/dL}$ (CURRENTLY $50 \mu\text{g/dL}$)
 - LAST 2 BLLs $\geq 20 \mu\text{g/dL}$
 - AVERAGE OF LAST 6 MONTHS $\geq 20 \mu\text{g/dL}$
 - FINAL MEDICAL DETERMINATION (BY PHYSICIAN)
 - NOT PERFORM ANY TRIGGER TASKS
 - ANY MATERIAL WITH LEAD $\geq 0.5\%$

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- **RETURN: 2 CONSECUTIVE BLLs AT LEAST 30 DAYS APART $\leq 15 \mu\text{g/dL}$**

- HAZCOM: SOME ADDITIONS

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- HAZCOM: SOME ADDITIONS
- EXPOSURE MONITORING
 - RECORDKEEPING ADDS DETAIL