

Lead Safe Work Practices Environmental Health and Safety

General Requirements

The compliance program must provide for frequent and regular inspections of job sites, materials and equipment by a competent person. Written programs, which must be revised and updated at least every six months, shall include the following:

- 1. A description of each activity in which lead is emitted (e.g., equipment used, material involved, controls in place, crew size, employee job responsibilities, operating procedures, and maintenance practices);
- 2. Specific plans to achieve compliance and engineering plans and studies where engineering controls are required:
- 3. Information on the technology considered to meet the PEL;
- 4. Air monitoring data that documents the source of lead emissions;
- 5. A detailed schedule for implementing the program, including copies of documentation (e.g., purchase orders for equipment, construction contracts);
- 6. A work practice program including regulations for the use of protective work clothing and equipment and housekeeping and hygiene facility guidelines;
- 7. An administrative control schedule for job rotation, if used;
- A description of arrangements made among contractors on multi-contractor sites to inform affected employees of potential exposure to lead and their responsibility to comply with this standard; and
- 9. Any other relevant information.

Engineering Controls

Engineering controls reduce employee exposure in the workplace either by removing or isolating the hazard or isolating the worker from exposure through the use of technology. Mechanical ventilation may be used to control lead exposure. If used, Environmental Health and Safety shall evaluate, as necessary, the mechanical performance of the system in controlling exposure to maintain its effectiveness.

Administrative Controls

Administrative controls can be used to reduce employee exposure by removing the employee from the hazard (e.g., job rotation). If administrative controls are used to reduce employee exposure to lead, the Department of the affected employee shall establish and implement a job rotation schedule. The program shall identify by name or number each affected employee, specify the duration and exposure level at each job or work station where each affected employee is located, and include other information useful to assess the reliability of administrative controls to reduce employee lead exposures.

Work Practice Controls

Work practice controls reduce the likelihood of exposure by altering the manner in which a task is performed. Safe work practices under the lead in construction standard include, but are not limited to, maintaining separate hygiene facilities (e.g., change rooms, showers, hand washing facilities and lunch areas) and requiring proper housekeeping practices (e.g., cleanup methods).

Housekeeping

All surfaces shall be maintained as free as practicable from the accumulations of lead.

Compressed air shall not be used to cleanup floors and other surfaces where lead accumulates unless it is used in conjunction with a ventilation system designed to capture the airborne dust created by the compressed air. Shoveling, dry or wet sweeping, and brushing shall be used only where vacuuming and other equally effective methods have been tried and found to be ineffective. Vacuums shall be equipped with high-efficiency particulate air (HEPA) filters and used and emptied in a manner that minimizes the re-entry of lead into the workplace.

Hygiene Facilities and Practices

Food, beverages, tobacco products, and cosmetics are prohibited in all areas where employees are exposed to lead above the PEL regardless of respirator use.

The University of Chicago shall provide the following for employees who are exposed to lead above the PEL:

- 1. Clean change areas equipped with separate storage facilities for protective work clothing and equipment to prevent cross-contamination of street cloths;
- 2. Shower and hand washing facilities; and
- 3. Lunchroom facilities or eating areas which are as free as practicable from lead contamination. Employees shall wash their hands and face prior to eating, drinking, smoking or applying cosmetics in these areas.

Personal Protective Equipment

The University of Chicago shall provide at no cost to the employee and ensure the proper use of personal protective equipment where employees are exposed to lead above the PEL, are exposed to lead compounds that may cause skin or eye irritation, or as interim protection for employees performing tasks listed at the beginning of this document regardless of respirator use. Appropriate personal protective work clothing and equipment which prevent contamination of employees and their garments include, but are not limited to, the following:

- Disposable coveralls or similar full-body suit;
- 2. Gloves, hats and disposable shoe coverlets; and
- 3. Face shields, vented goggles or other appropriate protective equipment, if necessary.