

## **Cal/OSHA Lead Standards -- Summary of Main Changes in Drafts**

- 1. Basic hygiene protections for all employees with occupational exposure:**
  - Food and beverages not allowed in work areas;
  - Hand washing facilities are readily available;
  - Employers ensure that employees wash hands and face before eating and drinking, and at the end of the shift.
  
- 2. For General Industry: 'Threshold amount of lead work' triggers most AL protections:**
  - Altering or disturbing lead for a combined duration of 8 hrs. during any 30-day period will trigger PPE, training program, medical surveillance, and posted signs.
  
- 3. For Construction: 'Presumed lead containing coating':**
  - Any untested coating on a metal structural member, or in or on a structure built before January 1, 1978, is presumed to contain lead;
  - Definition is incorporated into the scope, and into definitions of (d)(2) 'trigger tasks'.
  
- 4. Reduced PEL and AL values:**
  - The current drafts set forth a PEL of 10  $\mu\text{g}/\text{M}^3$ , and an AL of 2  $\mu\text{g}/\text{M}^3$ .
  
- 5. Elevated Blood Lead Level Investigation:**
  - Investigation, and deficiency correction, for any BLL  $\geq 10$   $\mu\text{g}/\text{dl}$ .
  
- 6. The criteria for medical removal protection (MRP) are changed:**
  - MRP for both standards:
    - 2 BLLs  $\geq 20$   $\mu\text{g}/\text{dl}$ ,
    - single BLL  $\geq 30$   $\mu\text{g}/\text{dl}$ ; or
    - average of all BLLs during a 6 month period  $\geq 20$   $\mu\text{g}/\text{dl}$ .
  - (Existing language:
    - GI: average of their last three BLL tests is  $\geq 50$   $\mu\text{g}/\text{dl}$ ;
    - Construction: 2 BLLs  $\geq 50$   $\mu\text{g}/\text{dl}$ .)
  
- 7. Protection of employee reproductive health emphasized:**
  - Written employee BLL notification (now for all BLLs) informs employee of employer's obligation to make available medical exams and consultations when employee has reproductive health concerns;
  
  - Training program highlights the vulnerability of reproductive health to low-level lead exposure, and the employee's right to a medical exam or consultation when employee has reproductive health concerns.