

General Industry and Construction Lead Standards

Outline of Changes Under Consideration

(Prepared for June 12, 2014 Advisory Meeting)

- **Reduced Permissible Exposure Limit (PEL) and Action Level (AL)** discussion drafts set forth a PEL of $10 \mu\text{g}/\text{M}^3$ and an AL of $2 \mu\text{g}/\text{M}^3$. Based on the modeling provided by the California Department of Public Health, these limits are necessary in order to maintain blood lead levels (BLLs) below $10 \mu\text{g}/\text{dl}$ (Kosnett, 2007). Public Health agencies have recommended that BLLs be maintained below $10 \mu\text{g}/\text{dl}$ in order to avoid adverse reproductive outcomes, and to avoid long-term damage to target organs.
- **Changes to the BLL testing protocols and frequency.** The discussion drafts include changes to the frequency at which employers would provide BLL testing. Testing would be offered initially and every 2 months for the first 6 months of placement, and then every 6 months after that. This is currently required by the construction standard only. A BLL of $10 \mu\text{g}/\text{dl}$ or more would trigger continued testing every two months; this currently is required at a BLL of $40 \mu\text{g}/\text{dl}$. Monthly testing would be required at a BLL of $20 \mu\text{g}/\text{dl}$ or more; this is currently required for those on medical removal protection. Testing for zinc protoporphyrin would not be required unless the employee's BLL was $20 \mu\text{g}/\text{dl}$ or greater.
- **Changes to criteria for medical removal protection.** Employees whose testing shows BLLs at or above $20 \mu\text{g}/\text{dl}$ for two tests spaced one month apart, or a single BLL at or above $30 \mu\text{g}/\text{dl}$, would be placed on medical removal protection. Currently, an employee in general industry must be removed if the average of their last three BLL tests is at or above $50 \mu\text{g}/\text{dl}$; in construction an employee is removed if their last two BLL are $50 \mu\text{g}/\text{dl}$ or more.
- **Protection of reproductive health.** Employee training would highlight the vulnerability of reproductive health to low-level lead exposure and the importance of medical consultation. The protection of reproductive health would be listed as a factor to consider in any physician-recommended special protective measures.
- **Basic hygiene protections.** For all employees covered by the standards, the discussion drafts would require that food and beverages are not present in work areas, and that hand washing facilities are available.
- **For General Industry: 'Threshold amount of lead work' as trigger.** Altering or disturbing lead for more than 8 hours during any 30 day period would trigger protections consisting of the same protections currently afforded employees shown to be exposed over the AL. In addition, employers would be required to provide to employees performing threshold work protective clothing, change rooms, clean eating areas, signs; and, in the absence of exposure monitoring to the contrary, medical surveillance and respiratory protection.
- **The employer would be required to investigate any BLL at or above $10 \mu\text{g}/\text{dl}$.** The employer would be required to correct any workplace factors that contributed to the elevated BLL.