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 µg/M³, and an AL of 2 µg/M³.

5. Elevated Blood Lead Level Investigation:
   • Investigation, and deficiency correction, for any BLL ≥10 µg/dl.

6. The criteria for medical removal protection (MRP) are changed:
   • MRP for both standards:
     ▪ 2 BLLs ≥20 µg/dl,
     ▪ single BLL ≥30 µg/dl; or
     ▪ average of all BLLs during a 6 month period ≥20 µg/dl.
   • (Existing language:
     ▪ GI: average of their last three BLL tests is ≥ 50 µg/dl;
     ▪ Construction: 2 BLLs ≥50 µg/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.