

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 ≥ 10 $\mu\text{g}/\text{dl}$.

- 6. The criteria for medical removal protection (MRP) are changed:**
 - MRP for both standards:
 - 2 BLLs ≥ 20 $\mu\text{g}/\text{dl}$,
 - single BLL ≥ 30 $\mu\text{g}/\text{dl}$; or
 - average of all BLLs during a 6 month period ≥ 20 $\mu\text{g}/\text{dl}$.
 - (Existing language:
 - GI: average of their last three BLL tests is ≥ 50 $\mu\text{g}/\text{dl}$;
 - Construction: 2 BLLs ≥ 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.