Lead Rule Stakeholders

May 4, 2018
Washington State
Lead Rulemaking Status
Purpose

- Background lead levels have significantly reduced since original adoption of the lead rule
  - Average adult blood lead reduced from ~20 µg/dL to <2 µg/dL
  - Studies have demonstrated adverse effects at any blood lead level
  - Significant permanent impairment is now documented at below 40 µg/dL
Purpose

- Primary focus of the rulemaking is to reduce occupational blood lead
  - Several existing recommendations for action at lowered levels
  - AECOM recommendation selected as the general model
Purpose

- To achieve the lower blood lead levels the current draft uses multiple strategies
  - Greater emphasis on hygiene and housekeeping
  - Broad criteria for requiring blood lead testing
  - Revised permissible exposure limit
  - Requiring review and correction when there are elevated blood lead levels, before medical removal
## Proposed Blood Lead Criteria

- **Advisory level**: 5 µg/dL
- **Control level**: 10 µg/dL
- **Multi-test removal level**: 20 µg/dL repeated
- **Single-test removal level**: 30 µg/dL
- **Return to work level**: 15 µg/dL repeated
Blood Lead Testing

- Blood lead testing proposed for all workers covered by the rule
- Action levels require regular monitoring
- Below action level, verification testing required after starting work and then every three years
Proposed Action Levels

- **Airborne lead**: $10 \, \mu g/m^3$ TWA$_{8e}$
- **Surface contamination**: $1000 \, \mu g/dm^2$
- **Metals**: $20 \, %$
- **Non-metals**: $0.5 \, %$
- **Aerosol**: $100 \, ppm$
Proposed Permissible Exposure Limit

- The current draft establishes two permissible exposure limits
- **PEL, 20 µg/m³ TWA₈ₑ**
  - Control plan, regulated areas, hygiene facilities, half-face respirators, work practice, and tool controls
- **Secondary PEL, 50 µg/m³ TWA₈ₑ**
  - Capital controls, respiratory protection APF
Lead Definition

- Current draft covers all lead exposures
- Exemption for some organic compounds is removed
- Exemption for minimal exposure situations
  - Such as working in a building with undisturbed lead paint or working with packaged materials.
Initial Classification of Work

- Expanded direction for pre-work assessments
- Tables of presumed exposure protection levels
  - Trigger tasks from current construction rule
  - Additional tasks for construction and other industries
- Clear expectation for providing protections at start of work
Basic Rules

- **Housekeeping requirements**
  - Added specifications on work practices

- **Training**
  - Lead information poster covers basic worker information

- **Hand/face washing**
  - Specifications added to rule for addressing lead
  - Previously required by general hygiene rule
Lead Control Requirements

- **Work practice and tool controls**
  - PEL, 20 µg/m³ TWA₈ₑ

- **Capital controls**
  - Secondary PEL, 50 µg/m³ TWA₈ₑ

- **Added specifications for ventilation control review**
  - Engineer specified monitoring protocol

- **Three year review cycle for controls**
Worker Choices

- Employers required to allow voluntary use of respirators
  - above the airborne action level, 10 µg/m³

- Added protection available at PEL
  - Worker may request respirator upgrade
  - Worker may use decon facilities
  - Employer required to monitor decon at SPEL
Employer Managing Blood Lead Levels

- Employer must develop written plan
  - Requirement at blood lead control level, 10 µg/dL
  - Must assess and improve hygiene and work practices

- Persistent elevated blood levels require further review of PPE and controls
Compliance Protocols

- Industry and task specific
  - Give directions for clearly compliant work practices
  - Offer reductions in monitoring requirements

- Incidental lead paint work (EPA RRP)
  - Handling lead paint in residential and light commercial construction
  - Specifications for work and PPE
  - Employer can use presumed exposure levels
Compliance Protocols

- **Gun ranges**
  - Added direction on work practices and controls
  - Allows using presumed exposures for some tasks

- **Clean areas**
  - Protocols for verifying minimal lead in work area
  - Employer may exclude employees in some areas from training and other requirements of the rule
Compliance Protocols

- Well managed blood lead levels
  - Reduced requirements for employers demonstrating that worker blood lead levels are kept below 10 µg/dL
  - DOSH will not conduct scheduled inspections
  - DOSH will not enforce PPE, work practice, or control requirements below the Secondary PEL

- Maintenance and repair work
  - Alternate protocols for tasks performed sporadically