

Vision Painting Inc. Safety Management System

Lead Awareness

1. Purpose

The purpose of this procedure is to advise employees in areas where lead is suspected on an awareness level basis about the properties and dangers of lead, general guidelines and training requirements. For more information refer to the Lead safety procedure for Vision Painting Inc..

2. Scope

This procedure applies to Vision Painting Inc. operations where employees whose work activities may contact lead containing materials but do not disturb the material during their work activities. When work is performed on a non-owned or operated site, the operator's program shall take precedence, however, this document covers Vision Painting Inc. employees and contractors and shall be used on owned premises, or when an operator's program doesn't exist or is less stringent.

3. Responsibilities

A. Managers and Supervisors

- In coordination with the Safety Manager, develop and implement annual lead awareness training.
- Ensure personnel are aware of work that has the potential of exposure to lead.
- Identify possible locations where lead in the workplace may be found.
- Inform the Safety Manager of upcoming work involving known or suspected lead-containing materials, allowing the Safety Manager to provide any necessary monitoring or other required actions.
- Ensure employees comply with the lead awareness requirements.

B. Safety Manager:

- Coordinate annual lead awareness training activities.

C. Employees:

- Comply with the lead awareness requirements and direct any questions or concerns to the Safety Manager.
- Attend required annual training.
- Review material safety data sheets or consult with the supervisor to identify any container with lead-containing material.

4. Procedure

A. Health Effects of Lead

Common symptoms of acute lead poisoning are loss of appetite, nausea, vomiting, stomach cramps, constipation, difficulty in sleeping, fatigue, moodiness, headache, joint or muscle aches, and anemia. Long term (chronic) overexposure to lead may result in severe damage to the blood-forming, nervous, urinary, and reproductive systems.

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B. Locations

Each worksite shall create a list of possible locations of lead containing materials such as leaded paints, leaded solders, pipes, batteries, circuit boards, cathode ray tubes, leaded glass, and demolition/salvage materials.

The list is to be provided to the Safety Manager on a quarterly basis and revised as lead containing materials are added or eliminated from the previous list.

C. General Requirements

Employees must abide by any signs/labels/assessment reports indicating the presence of lead containing materials and will not disturb the lead containing material. Appropriate work practices shall be followed to ensure the lead containing materials are not disturbed. Regulated access signs are to demarcate the lead exposure regulated work areas. The signs should read as follows:

WARNING LEAD
WORK AREA
POISON
NO SMOKING OR EATING

D. General Work Practices

When working on multi-contractor worksites Vision Painting Inc. employees shall be protected from exposure. If employees working immediately adjacent to a lead abatement activity are exposed to lead due to the inadequate containment of such job, Vision Painting Inc. shall either remove the employees from the area until the enclosure breach is repaired or perform an initial exposure assessment.

Employees will wash hands and face if lead materials are contacted. Employees' hands and faces shall be washed if lead containing materials are contacted. Any possible contact with lead containing material must be reported immediately to the supervisor or Safety Manager.

If air is re-circulated back into the workplace, the system must be equipped with a HEPA (high efficiency particulate air) and backup filter, and a system to monitor the lead level will be installed.

When using mechanical means to remove lead-containing paints or coatings, use equipment which is equipped with a HEPA collection system.

Whenever possible, use a wet system to reduce airborne dust.

Whenever possible, substitute lead material with non-leaded material.

Respirators shall be used during the time period required to install or implement control if engineering and work practices are insufficient as well as for emergency use.

If respirators are required, they will be NIOSH certified and all employees will follow the Vision Painting Inc. Respiratory Protection Program.

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5. Training

Lead awareness training is required at time of hire, during orientation or before initial assignment in areas where lead is suspected and annual refresher training is conducted. Lead awareness training is required for employees whose work activities may contact lead containing materials but do not disturb the material during their work activities. Lead awareness training is required at time of hire, during orientation, or before assignment to areas containing lead.

Refresher training must be given annually.

Documentation of training - Lead awareness training shall be documented including dates of training, location of training, employee name and trainer name.

Training will include the health effects of lead, how to report suspected locations of lead containing material and not to disturb any possible lead containing material.

Training records shall be provided upon request all materials relating to the employee information and training program to regulatory agencies.