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This Gallant Builders Policy applies to all construction work where an employee may be occupationally exposed to lead. **Construction work** is defined as work for construction, alteration and/or repair, including but not limited to painting and decorating;

1. Demolition or salvage of structures where lead or materials containing lead are present;
2. Removal or encapsulation of materials containing lead;
3. New construction, alteration, repair, or renovation of structures, substrates, or portions there of, that contain lead, or materials containing lead;
4. Installation of products containing lead;
5. Lead contamination/emergency cleanup;
6. Transportation, disposal, storage, or containment of lead or materials containing lead on the site or location at which construction activities are performed, and
7. Maintenance operations associated with the construction activities.

I. DEFINITIONS

Action level - means employee exposure, without regard to the use of respirators, to an airborne concentration of lead of 30 micrograms per cubic meter of air (30 ug/m3) calculated as an 8-hour time-weighted average (TWA).

Competent Person - means one who is capable of identifying existing and predictable lead hazards in the surroundings or working conditions and who has authorization to take prompt corrective measures to eliminate them.

Lead - means metallic lead, all inorganic lead compounds, and organic lead soaps.

Permissible Exposure limit:
Gallant will assure that no employee is exposed to lead at concentrations greater than fifty micrograms per cubic meter of air (50 ug/m3) averaged over an 8-hour period.

If an employee is exposed to lead for more than 8 hours in any work day the employees' allowable exposure, as a time weighted average (TWA) for that day, shall be reduced according to the following formula:

Allowable employee exposure (in ug/m3) =400 divided by hours worked in the day.

Employee exposure may be considered to be at the level provided by the protection factor of the respirator for those periods the respirator is worn. Those periods may be averaged with exposure levels during periods when respirators are not worn to determine the employee's daily TWA exposure.

II. EXPOSURE ASSESSMENT

Gallant and the other employers on the project whose scope of work involves exposure to lead will initially determine if any employee may be exposed to lead at or above the action level without the protection of a respirator.

The contractor performing the lead work will collect personal air samples representative of a full shift including at least one sample for each job classification in each work area either for each shift or for the shift with the highest exposure level.

The full shift monitoring will be representative of the monitored employee's regular, daily exposure to lead.

Send samples off to lab for analysis and request "next day results".

III. PROTECTION OF EMPLOYEES DURING ASSESSMENT EXPOSURE

Gallant will treat the employee working on any task involving lead as if the employee were exposed above the PEL 5Oug/m3), and not in excess of ten (10) times the PEL, and shall implement protective measures. These tasks involve but are not limited to the following:

1. Where lead containing coatings or paint are present
2. Manual demolition of structures (i.e.: dry wall)
3. Manual scraping
4. Manual sanding
5. Heat gun applications
6. Power tool cleaning with dust collection systems
7. Spray painting with lead paint

We will provide for the employee exposed to lead the following interim protection until the exposure assessment is made and the initial test results are received:

1. Respiratory Protection
2. Personal Protective Clothing and Equipment
3. Clothing change area
4. Hand Washing Facilities
5. Biological Monitoring
    a. Blood Sampling and Analysis
    b. Analysis for Lead
    c. Analysis for inc protoporphyrin levels

6. Training
    a. Hazard Communication Training
    b. Respiratory Protection Training
    c. Safety Training and Education Training per 29 CFR 1926.21
7. Warning signs should be posted in the work area where the PEL is exceeded

BASIS OF INITIAL DETERMINATION:
Gallant Builders will monitor and make the initial determination on the employee exposure monitoring results and any of the following relevant considerations:

a. Any information, observations, or calculations which would indicate employee exposure to lead;
b. Any previous measurements of airborne lead; and
c. An employee complaints of symptoms which may be attributable to exposure to lead.

The monitoring for the initial determination will be a representative sample of the persons and locations that we believe are exposed to the greatest airborne concentrations of lead in the workplace.

If the area and/or personnel have been monitored within the last twelve (12) months, we will use that data or objective data, if objective data is relied upon, the same control measures must be utilized. If we have objective data from the manufacturer stating that a particular product or material containing lead or a specific process, operation or activity involving lead cannot result in employee exposure to lead at or above the action level during processing, use, or handling, we will rely on that data for the initial monitoring until such time that subsequent monitoring is required (i.e. circumstances change scope of work).

PERSONAL MONITORING:

1. Hire an industrial hygiene laboratory to conduct the monitoring.
2. It will also help in the management of the lead exposure to monitor the room or area while the personnel conduct their lead task. This monitoring should take place at the same time that the personal monitoring takes place but must monitor the full shift (minimum of eight hours). This will give you the worst case scenario for that particular work area. These results can be compared to the time-weighted average test results of the personal samples.
3. Must notify the exposed employees in writing (certified mail, return receipt) of the results which represents that employee's exposure. We will establish and maintain an accurate record documenting the nature and relevancy of the objective data where used for exposure assessment of employees in lieu of initial exposure monitoring. This information must be shared with all contractors in the lead work area.

Positive Initial Determination and Initial Monitoring:
If the initial monitoring culminates in a result that is at or above the action level, Gallant will conduct monitoring on every employee in the workplace that is exposed to lead.
If we have previously monitored the employees in a specific work area and the data is less than 12 months old and they were at or above the action level, then we will use that data for the initial determination to begin the work again and monitor each employee who will be working in that area to determine their immediate exposure.

Notification to the employees about lead concentrations above the action level must also provide a description of corrective action taken or to be taken to reduce the exposure to below the action level.

NEGATIVE INITIAL DETERMINATION:

When monitoring data reflects that no employee was exposed to airborne concentrations of lead at or above the action level, we will make a written record of such determination. The record will include at least the date of the determination, location within the worksite, and the name and social security number of each employee monitored.
Notification to the employees about lead concentrations above the action level must also provide a description of corrective action taken or to be taken to reduce the exposure to below the action level.

FREQUENCY:
If the initial determination reveals employee exposure to be below the action level further monitoring need not be repeated unless there has been a change of equipment, process, control, personnel or a new task has been initiated that may result in other employees being exposed to lead at or above the action level or may result in employees already exposed at or above the action level being exposed above the PEL, we will conduct additional tests to measure their actual exposure.

If initial determination or subsequent determination reveals employee exposure to be at or above the action level (30 ug/m3) but at or below the PEL (50 ug/m3), we will monitor at least every six months. We will continue to monitor until at least two consecutive measurements taken at least seven (7) days apart, are below the action level at which time we will discontinue the monitoring of those employees at that time.

If the initial determination reveals that employee exposure is above the PEL we will conduct monitoring quarterly. We will continue monitoring until at least two consecutive measurements, taken at least 7 days apart, are at or below the PEL but at or above the action level at which time we will repeat the monitoring for those employees at the required frequency.

We will continue to monitor at the required frequency until at least two consecutive measurements, taken at least 7 days apart, are below the action level at which time we may discontinue monitoring for those specific employees.

ADDITIONAL EXPOSURE ASSESSMENTS:
If there has been a change of equipment, process, control, personnel or a new task has been initiated that may result in additional employees being exposed to lead at or above the action level or may result in employees already exposed at or above the action level being exposed above the PEL, we will conduct additional monitoring for those affected employees.

EMPLOYEE NOTIFICATION:
We will notify each employee within 5 working days after completion of the exposure assessment in writing by certified mail of the results which represents each employee's exposure. Whenever the results indicate that the representative employee exposure, without regard to respirators, is at or above the PEL we will include in the written notice a statement that the employees' exposure was at or above that level and a description of the corrective action taken or to be taken to reduce the exposure to below that level.

ACCURACY OF MEASUREMENT:

Gallant Builders will use a method of monitoring and analysis which has an accuracy (to a confidence level of 95%) of not less than plus or minus 25 percent for airborne concentrations of lead equal to or greater than 30 ug/m3.

IV. METHODS OF COMPLIANCE

ENGINEERING AND WORK PRACTICE CONTROLS:
We will implement engineering and work practice controls, including administrative controls, to reduce and maintain employee exposure to lead at or below the permissible exposure limit to the extent that such controls are feasible. Wherever all feasible engineering and work practice controls that can be instituted are not sufficient to reduce employee exposure of or below the permissible exposure limit, we will use them to reduce employee exposure to the lowest feasible level and will supplement them by the use of respiratory protection.

COMPLIANCE PROGRAM:
Prior to commencement of the job we will establish and implement a written compliance program to achieve compliance with the standard (29 CFR 1926.62) which
involves the following:

- **A.** A description of each activity in which lead is emitted; e.g. equipment used, material involved, controls in place, crew size, employee job responsibilities, operating procedures and maintenance practices;
- **B.** A description of the specific means that will be used to achieve compliance and, where Engineering controls are required, engineering plans and studies used to determine methods selected for controlling exposure to lead;
- **C.** A report of the technology considered in meeting the PEL;
- **D.** Air monitoring data which documents the source of lead emissions;
- **E.** A detailed schedule for implementation of the program, including documentation such as copies of purchase orders for equipment, construction contracts, etc.;
- **F.** An administrative control program;
- **G.** A description of arrangements made among contractors on multi-contractor sites with respect to informing affected employees of potential exposure to lead and with respect to responsibility for compliance; and
- **H.** Other relevant information.

The compliance program will provide for frequent and regular inspections of job sites, materials, and equipment to be made by the competent person designated by the project manager.
The written compliance program will be available upon request to any interested employee, authorized employee representatives, to OSHA and in the office for review.
We will revise and update the program every six months or as needed to reflect the most current program.
MECHANICAL VENTILATION:

When Gallant uses ventilation to control lead exposure, we will evaluate the performance of the system through monitoring and other systems recommended by the manufacturer and correct if needed to ensure it's effectiveness.

ADMINISTRATIVE CONTROLS:
If Gallant uses administrative control as a means of reducing employees TWA exposure to lead, we will establish and implement a job rotation schedule which includes:

- **A.** Name and identification number of each affected employee;
- **B.** Duration and exposure levels at each job or work station where each affected employee is located;
- **C.** Any other information which may be useful in assessing the reliability of administrative controls to reduce exposure to lead; and
- **D.** We will ensure and enforce good work practices.

RESPIRATORY PROTECTION:
Where respirators are required we will provide them at no cost to the employees and assure the use of the respirators where they are required. Respirators shall be used in the following circumstances:

A. Whenever an employee's exposure to lead exceeds the PEL;
B. In work situations in which engineering controls and work practices are not sufficient to reduce exposures to at or below the PEL;
C. Whenever an employee requests a respirator; and
D. As interim protection for employees performing tasks for which the initial monitoring has not yet been concluded that the exposure is at or below the action level.
E. For third party protection and to prevent the possibility of a workers' compensation claim.

RESPIRATORY SELECTION:
Gallant will select the appropriate respirators or a combination of respirators for the task assigned. We will also provide the powered, air-purifying respirator in lieu of the other types approved for the assigned if the employee chooses to use this type and it provides adequate protection according to 29 CFR 1926.62.

The respirators selected will only be respirators approved by The Mine Safety and Health Administration and The National Institute For Safety and Health for protection against lead dust, fume, and mist.

RESPIRATOR USAGE:
Gallant will assure that the respirators issued by the employee exhibits minimum facepiece leakage and that the respirator is fitted properly.

We will perform either the quantitative or qualitative face fit tests at the time of initial fitting and at least every six months thereafter for each employee wearing negative pressure respirators. The qualitative fit test will be only for testing the fit of half-mask respirators where they are permitted to be worn and will be conducted in accordance with appendix D of 29 CFR 1926.62. If an employee exhibits difficulty in breathing during the fitting test or during use, we will make available to the employee an examination to determine whether the employee can wear a respirator while performing the required duty.
RESPIRATOR PROGRAM:

Gallant will institute a respiratory protection program in accordance with 29 CFR 1910. 134(b),(d), (e) and (f). We will permit each employee who uses a filter respirator to change the filter elements whenever an increase in breathing resistance is detected and shall maintain an adequate supply of filter elements for this purpose. Employees who wear respirators will be permitted to leave work areas to wash their face and respirator facepiece whenever necessary to prevent skin irritation associated with respirator use.

V. PROTECTIVE WORK CLOTHING AND EQUIPMENT

PROVISION AND USE:
Gallant will provide at no cost to employees, and assure that employees use appropriate protective work clothing and equipment that prevents contamination of the employee and the employee's garments when they are exposed to lead above the PEL without regard to the use of respirators, where employees are exposed to lead compounds which may cause skin or eye irritation and as interim protection for employees performing tasks.

Garments that we will provide to prevent contamination of the employees and the employee's garments such as, but not limited to:

- **A.** Coveralls or similar full-body work clothing;
- **B.** Gloves, hats, and shoes or disposable shoe coverlets; and
- **C.** Face shields, vented goggles, or other appropriate protective equipment.

CLEANING AND REPLACEMENT:
Gallant will provide the protective clothing in a clean and dry condition at least weekly, and daily to employees whose exposure levels without regard to a respirator are over 2OOug/m3 of lead as an 8-hour TWA.

We will provide for the cleaning, laundering, and disposal of protective clothing and equipment. We will repair or replace required protective clothing and equipment as needed to maintain their effectiveness.

We will provide tyvex disposable coverall suits with head covers and footies etc., and be responsible for the disposal of same.

We will assure that all protective clothing is removed at the completion of a work shift **only in change areas provided for that purpose.**

Gallant will assure that contaminated protective clothing which is to be cleaned, laundered, or disposed of, is placed in a closed container in the change area which prevents dispersion of lead outside the container.

We will inform in writing any person who cleans or launders protective clothing or equipment of the potentially harmful effects of exposure to lead.

We will assure that the containers of contaminated protective clothing and equipment are labeled as follows:

CAUTION: CLOTHING CONTAMINATED WITH LEAD. DO NOT REMOVE DUST BY BLOWING OR SHAKING. DISPOSE OF LEAD CONTAMINATED WASH WATER IN ACCORDANCE WITH APPLICABLE LOCAL, STATE, OR FEDERAL REGULATIONS.

Gallant **prohibits** the removal of lead from protective clothing or equipment by blowing, shaking, or any other means which disperses lead into the air.

HOUSEKEEPING:
All surfaces shall be maintained as free as practicable of accumulations of lead. Clean-up of floors and other surfaces where lead accumulates shall wherever possible, be cleaned by vacuuming or other methods that minimize the likelihood of lead becoming airborne. Shoveling, dry or wet sweeping, and brushing may be used only where vacuuming or other equally effective methods have been tried and found not to be effective.

Where vacuuming methods are selected, the vacuums shall be equipped with HEPA filters and used and emptied in a manner which minimizes the reentry of lead into the workplace.

Compressed air shall not be used to remove lead from any surface unless the compressed air is used in conjunction with a ventilation system designed to capture the airborne dust created by the compressed air.

HYGIENE FACILITIES AND PRACTICES:
Gallant will assure that in areas where employees are exposed to lead above the PEL without regard to the use of respirators, food or beverage is not present or consumed, tobacco products are not present or used, and cosmetics are not applied.

CHANGE AREAS:
Gallant will provide clean change areas for employees whose airborne exposure to lead is above the PEL, and as interim protection for employees performing tasks without regard to the use of respirators. We will ensure that change areas are equipped with separate storage facilities for protective work clothing and equipment and for street clothes which prevent cross-contamination.

Employees **will not be allowed** to leave the work place wearing any protective clothing or equipment that is required to be worn during the work shift.

VI. SHOWERS

Gallant will provide shower facilities, where feasible, for use by employees whose airborne exposure to lead is above the PEL. We will assure that employees shower at the end of the work shift and will supply cleaning agents and towels to be used by the affected employees.

VII. EATING FACILITIES

Gallant will provide an area to eat for the employees whose airborne exposure to lead is above the PEL, without regard to the use of respirators.

We will assure that eating areas are as free as practicable from lead contamination and are readily accessible to employees.

All Gallant employees whose airborne exposure to lead is above the PEL without regard to the use of respirators must wash their hands and face prior to eating, drinking, smoking or applying cosmetics.

Gallant **prohibits** employees from entering the eating areas with protective work clothing or equipment unless surface lead dust has been removed by vacuuming, downdraft booth, or other cleaning method that limits dispersion of lead dust.

VIII. HAND WASHING FACILITES

Hand washing facilities will be provided for employees exposed to lead in accordance with 1925.51 (f) **(hot and cold water).**

BIOLOGICAL MONITORING:

1. We will provide initial medical surveillance to employees who have had any exposure to lead on any given day at or above the action level (30ug/m3) or who is a part of the initial exposure assessment process or who has been exposed at or above the action level for more than 30 days in a consecutive 12-month period.

2. Blood test should be every 2 months for the first six months and every six months thereafter if they have been exposed at or above the action level. If the exposure is less than the action level then re-test at the end of the completed task for the third party protection and to reduce the potential for a workers' compensation claim.

3. Biological monitoring will consist of blood sampling and analysis by an OSHA approved laboratory for lead and zinc protoporphyrin levels.

4. All medical surveillance, examination, and procedures will be performed by licensed physician.

5. Employees must be notified in writing within 5 days after receipt of the results of their blood levels. **Send them their results certified mail return receipt**.

Employee Information and Training:

1. Information and training will be provided for all employees exposed at or above the action level (30ug/3) on any day or who have been or potentially could be exposed to lead compounds which may cause skin or eye irritation (e.g. lead arsenate, lead azide) or will be a part on the initial assessment process.

2. Training will be conducted prior to the start-up of the lead project or beginning of the assignment.

3. Training will also be conducted manually for those employees who could be exposed to

lead at or above the action level on any day.

4. Employees will be trained in the following:

    a) The content of the lead standard and it's appendices.
    b) The specific nature of the operations which could result in exposure to lead above the action level (30ug/m3).
    c) The purpose, proper selection, fitting, use, and limitations of respirators.
    d) The purpose and a description of:

1. Medical surveillance program

2. Medical removal protection program

3. Adverse health effects associated with excessive exposure to lead

4. Adverse reproductive effects on both males and females and hazards to the fetus and additional precautions for employees who are pregnant.

5. The engineering controls and work practices associated with the employee's job assignment including training employees to follow relevant good work practices.

6. The contents of a compliance plan

7. Instructions to employees that chelating agents should not routinely be used to remove lead from their bodies and should not be used at all except under the direction of a licensed physician.

8. The employee's right of access to records under 29 CFR 1910.20.

9. We must provide a copy of this standard and its appendices to each employee receiving the training.

OVERALL PROCEDURAL STEPS

1. Pick a very controlled group.

a) Competent Personnel
b) Try to use the same people each time
c) Get Social Security Number
d) Document all lead activities.

2. Have their blood tested for lead concentration and zinc protoporphyrin levels (establishing a baseline).

3. Provide protection clothing.

4. Provide appropriate respirator (HEPA filtered).

5. Provide fitness test with kit and documentation of each employee. Repeat every six month.

6. Provide initial area monitoring.

    a) Use SKC Pumps and CEF 3 stage filers (from your designated lab)
    b) One pump per job description
    c) Use on pump to monitor the area for a full eight hour shift.
    d) Send filters to your designated lab for next day results.
    e) Notify employees within 5 day of receipt.

7. Provide personal protective clothing, recommend tyvex disposable coveralls.

8. Provide a change room, disposal container for contaminated clothing and equipment, and hand and face washing facilities.

9. Provide appropriate signs

10. Provide training and orientation prior to the beginning of task.

11. Document each step of the task and each person that participated and what they did including times, and the environmental variables.

12. If the testing results are below the action level (30ug/m3) the testing may be discontinued. It is still recommended to document all activities and personnel participating.

Negative Results (below 30ug/m3):

1. Discontinue respiratory protection.

However, recommend continuing the wearing of respirators to provide third party protection and reduce possibility of a workers' compensation claim by preventing the possibility of <u>inhalation</u>.

2. Discontinue protection clothing.

However, recommend continuation of wearing gloves to prevent third party exposure and to reduce the possibility of a worker's compensation claim by preventing <u>ingestion</u>.

3. Discontinue change area but provide disposal container for the extended use of the gloves.
4. Continue to provide a hand and face washing facility and keep the sign posted.

5. Discontinue the blood testing, however: establish baselines on any new personnel working in a pretested area and retest the control group at the completion of the lead task.

6. Continue the training on an annual basis if we are still handling lead at that time.

GALLANT BUILDERS

LEAD IN CONSTRUCTION

EMPLOYEE INFORMATION AND TRAINING

TASK: INWALL LEAD SHEETS AND MISCELLANEOUS LEAD INSTALLATION

This training will task place prior to the time of the job assignment. We will provide you with a copy of the standard and the appendices.

1. The task will be to install lead sheets in hospital room walls approximately seven feet high.
   a) The sheets may be cut to fit the space provided and attached to metal studs by screws.
   b) Cutting from these operations could become airborne and respirable size lead particulate could enter the airways of those working in these rooms.

2. Respiratory Protection will be provided to prevent the airborne contaminants from entering the breathing zone of each employee.
   a) We will be using 9970 respirators which are approved by the Mine Safety and Health Administration and/or the Nations Institute for Occupation Safety to protect the breathing zone of each employee from exposure to lead.
   b) The only way that respirators can effectively prevent lead from entering the employee's breathing zone is to have a good fit.

      i. There will be a fitness test to ensure proper fit and the ability to wear the respirator while conducting your task.
      ii. The respirator must be worn at all times when the risk of airborne lead is prevalent.

      iii. The 9970 respirator has the ability to preclude particle down to 0.3 microns in size.

      iv. The only way that the respirator can work is that the respirator is worn properly.

3. Medical Surveillance

a) We will provide blood test for each employee before you are exposed to the lead or the lad atmosphere to establish a baseline.
b) Before and after the task.
c) Medical Removal
d) Adverse Health
   1. Liver
   2. Kidney
   3. Blood disorders
   4. Sterility
   5. Gastrointestinal

4. Engineering Controls

5. Compliance Plan

6. Chelating agents should not routinely be sued to remove lead from their bodies and should not be used at all except under the direction of a licensed physician.

7. Employee's right of access to medical records.

GALLANT BUILDERS

LEAD IN CONSTRUCTION

EMPLOYEE INFORMATION AND TRAINING
TASK: ELECTRICAL INSTALLATION FOR LEADLINED ROOMS

This training will take place prior to the time of the job assignment. We will provide you with a copy of the standard and the appendices.

1. The task will be as follows:
   a) Install floor duct utilizing a hammer drill.
   b) Install wall and ceiling duct.
   c) Electrical "in-wall" rough-in (J.B.'s, switches, conduit, etc.) utilizing drill motor, hack saw and other non-power tools.
   d) Install IPU.
   e) Install RG1's.
   f) Provide equipotential grounding.
   g) Rough-in package control for AC unit.
   h) Rough-in intercom system.
   i) Rough-in microphone system.
   j) Rough-in sound system cabinet.
   k) Rough-in J.B. for physiological monitoring cables.

Cutting from these operations could become airborne and respirable size lead particulate could enter the airways of those working in these rooms.

2. Respiratory Protection will be provided to prevent the airborne contaminants from entering the breathing zone of each employee.

    a) We will be using 9970 respirators which are HEPA filtered respirators and approved the

Mine Safety and Health Administration and/or the National Institute for Occupational Safety and Health to protect the breathing zone of each employee from the exposure to lead.

    b) The only way that respirators can effectively prevent lead from entering the employee's breathing zone is to have a good fit.

        i. There will be a fitness test to ensure proper fit and the ability to wear the respirator while conducting your task.
        ii. The respirator must be worn at all times when the risk of airborne lead is prevalent.
        iii. The 9970 respirator has the ability to preclude particle down to 0.3 microns in size.
        iv. The only way that the respirator can work is that the respirator is worn properly.

3. Medical Surveillance

    a) We will provide blood test for each employee exposed to the lead or the lead atmosphere to establish a baseline.
    b) Before and after the task.
    c) Medical Removal.
    d) Adverse Health
        1. Liver
        2. Kidney
        3. Blood disorders
        4. Sterility
        5. Gastrointestinal

4. Engineering Controls

5. Compliance Plant

6. Chelating agents should not routinely be used to remove lead from their bodies and should not be used at all except under the direction of a licensed physician.

7. Employee's right of access to medical records.