



# Lead Management

Environmental Health and Safety



## I. Purpose

This program establishes the

- vii. Coordinate with EHS and qualified and licensed contractors to identify project scopes, material sampling and analysis, abatement, and air monitoring.
  - viii. Provide material sampling results, reports, abatement plans, and air monitoring results to EHS for review.
- C. **Project Managers (including those who oversee activities that may encounter lead)**
- i. Adhere to the requirements of this program.
  - ii. Complete all required training (see **Section IX – Training**).
  - iii. Notify EHS and other affected parties of any known or suspected lead-containing materials that have been disturbed, damaged, appear deteriorated, or may be disturbed by planned activities.
  - iv. Inform EHS of all material sampling. Coordinate material sampling with EHS, as necessary and when requested.
  - v. Ensure project-specific lead compliance plans are developed

**F. Environmental Health Consultants and Abatement Contractors**

- i. Adhere to the requirements of this program.
- ii. Perform work in accordance with all applicable federal, state, and local rules and regulations.
- iii. Ensure that subcontractors adhere to the requirements of this program.
- iv. Ensure that employees are appropriately licensed, qualified, and trained for the scope of work.
- v. Contractors performing lead abatement and mitigation must submit a notification to the Illinois Department of Public Health (IDPH) at least 7 calendar days prior to the commencement of any lead abatement or lead mitigation project in a residential or childcare facility. Copies of the notification must be shared with EHS and Northwestern Project Managers.
- vi. Abatement contractors must develop and submit to the Illinois Department of Public Health (IDPH) a Work Practice and Occupant Protection Plan for each lead abatement or lead mitigation project, in accordance with 77 IAC Part 845 Section 255. The Work Practice and Occupant Protection Plan must also be submitted to EHS and Northwestern Project Managers and will serve as the lead compliance plan for the project.
- vii. Coordinate inspections, material sampling, testing (e.g., X-ray fluorescence)



- iii. Personal protective equipment
  - a) Employees that are or may be exposed to lead above the OSHA AL must use the following personal protective equipment:
    - (1) Disposable coveralls or a similar full-body suit
    - (2)





- iv. Contractors performing lead abatement and mitigation must develop a project-specific Work Practice and Occupant Protection Plan, in accordance with 77 IAC 845. The Work Practice and Occupant Protection Plan must also be submitted to EHS and Northwestern Project Managers and will serve as the lead compliance plan for the project.

VII. Occupational ~~Exposure~~ ~~(OTC)~~ ~~(JEMC)~~ ~~Lead~~ ~~(BOP)~~

- iv. A description of the sampling and analytical method used
- E. Within five days of the receipt of laboratory results, EHS will share the monitoring results with the department and monitored employees. If the monitoring results indicate an exposure above the PEL, EHS will include necessary steps to reduce exposure.

## VIII. Medical Surveillance Program

- A. Initial Biological Monitoring
  - i. Any employee who is or may be exposed on any day to airborne lead concentrations above the OSHA action level (AL) of 30  $\mu\text{m}^3$  will have the opportunity to receive baseline biological monitoring for blood lead level (BLL) and zinc protoporphyrin and be enrolled in the medical surveillance program.
  - ii. Any employee potentially exposed to airborne lead concentrations at or above the AL for more than 30 days in any 12-month period, or any employee exposed to any amount of lead who develops symptoms of lead exposure, will undergo baseline biological monitoring for blood lead level (BLL) and zinc protoporphyrin and be enrolled in the medical surveillance program.
- B. Periodic Biological Monitoring
  - i. Employees enrolled in the medical surveillance program who are exposed to lead above the OSHA AL will undergo periodic biological monitoring for blood lead levels and zinc protoporphyrin every 2 months for the first 6 months, and every 6 months thereafter.
  - ii. Employees enrolled in the medical surveillance program with blood lead levels above 40  $\mu\text{g}/\text{dl}$  will undergo periodic biological monitoring for blood lead levels and zinc protoporphyrin every 2 months until two consecutive tests indicate blood lead levels below 40  $\mu\text{g}/\text{dl}$ .
- C. Medical Removal
  - i.

- iii. Return to Former Job Status following Medical Removal
  - a) Employees removed due to a blood lead level may return to normal job duties when two consecutive blood samples indicate that the employee's blood lead level is below 40 µg/dl.
  - b) Employees removed or restricted due to a final medical determination may return to normal job duties and/or remove any job limitations when a subsequent final medical determination finds that the employee is no longer at increased risk from exposure to lead.
- iv. Northwestern will provide up to 18 months of medical removal protection benefits on each occasion that an employee is removed from exposure to lead or otherwise limited, in accordance with 29 CFR 1926.62(k)(2). These benefits include, but are not limited to maintaining the total normal earnings, seniority, and other employment rights and benefits of an employee, including the employee's right to his or her former job status.
- D. Medical examinations and consultations must be made available to employees exposed to lead above the OSHA AL for more than 30 days in any consecutive 12 months and in accordance with the requirements found in 29 CFR 1926.62(j)(3).
- E. All medical evaluations, including multiple physician reviews, will be free of cost to employees and take place at a reasonable time and place.
- F. Biological monitoring results must be shared with the employee within 5 days.

## IX. Training

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## X. Recordkeeping

- A. Project managers must forward all project scopes, sampling and analytical reports, abatement records, and air monitoring results to EHS for recordkeeping.
- B. EHS will maintain records of lead testing and the type, quantity, and location of all known lead-containing materials that have been identified, removed, encapsulated, enclosed, or repaired. These records will be maintained for at least the life of the building or structure where the materials are found.
- C. EHS will provide records of lead testing to schools, units, and contractors upon request and in the event of a potential exposure.
- D. Training records will be maintained by EHS in myHR Learn and kept for the duration of employment, plus 1 year.
- E. EHS will maintain records of medical removals for at least the duration of the employee's employment.
- F. Records of employee exposure monitoring and medical surveillance

## Appendix A – Lead Work Area Signage Example



