

Model written medical monitoring and worker protection program

The following sample safety and health programs are intended to provide examples of written programs on various workplace safety and health topics; they are not intended to supersede the requirements in OSHA standards. Employers should consult the applicable OSHA standards for the specific requirements applicable to their workplaces. Employers can use these sample programs as guidance when developing their own customized programs that are tailored to their specific workplaces.

Model written medical monitoring and worker protection program

The following sample safety and health programs are intended to provide examples of written programs on various workplace safety and health topics; they are not intended to supersede the requirements in OSHA standards. Employers should consult the applicable OSHA standards for the specific requirements applicable to their workplaces. Employers can use these sample programs as guidance when developing their own customized programs that are tailored to their specific workplaces.

LEAD MEDICAL MONITORING PROGRAM AND WORKER PROTECTION FOR [insert name of company]

Applicability

The requirements of 29 CFR 1926.62, 29 CFR 1910.134 and 454 CMR 22.00 shall apply to the personal protection and medical monitoring of employees.

[insert name of company] shall maintain as records the results of all personal exposure monitoring, respirator fit testing, medical examinations and blood lead testing conducted pursuant to 29 CFR 1926.62(a),(f),(j) and 454 CMR 22.09 as a condition of licensure.

The frequency of blood monitoring of employees shall be governed by 454 CMR 22.09(5)(a) and 29 CFR 1926.62(j).

Respiratory requirements

See [insert company name] respirator protection program

Personal protective equipment

[insert name of company] shall ensure that employees, inspectors and other persons involved in deleading work are provided with protective clothing and other personal protective equipment which meets the requirements of relevant OSHA standards, including 29 CFR 1926.62(g). Additionally, the following specific requirements must be met:

- [insert name of company] shall provide employees with protective clothing and equipment without cost

- protective clothing shall provide sufficient coverage and be sufficiently impermeable to lead, caustic paste, chemical solvents and other contaminants to prevent contamination of underlying garments or body surfaces.
- where dust-generating methods are used, *[insert name of company]* shall provide a minimum of 2 changes of protective clothing during an 8-hour day.
- where caustic paste is used to remove lead paint, the *[insert name of company]* shall provide and ensure the use of: full body coveralls impervious to caustic substances; gloves impervious to caustic substances; glove extenders; appropriate boot or shoe covers; and where caustic past is to be applied at or above face level, face shields.

[insert any other PPE that is used or required for use on your job sites-hardhats, steel toe boots, fall restraints, goggles or faceshields.]

Medical surveillance

[name of company] shall provide for two levels of medical surveillance:

- Initial medical surveillance shall be provided for any employee who is exposed at or above 30 ug/m³ for at least one day per year
- Full medical surveillance shall be provided for (1) any employee who is exposed at or above 30 ug/m³ for more than 30 days per year; (2) all potentially exposed employees where the concentration of lead in the air is not known but {name of company} has reason to believe employees will be exposed at or above the action level of 30 ug/m³ for more than 30 days per year. Since exposures at lead abatement sites can potentially be above 30 ug/m³ *[name of company]* requires all workers to participate in the full medical surveillance program.

The initial medical surveillance consists of testing the blood lead level and zinc protoporphyrin (ZPP) level.

Full medical surveillance consists of:

- Checking blood lead levels every 2 months for the first 6 months, and quarterly thereafter
- Monitoring work history, symptoms and performing a physical examination to assess:
 - work practices
 - personal hygiene habits
 - symptoms of lead or other poisons,
 - signs of adverse health effect
- Documentation of the medical surveillance program
- Assessing blood lead level and any effects of lead exposure when the employee was hired or placed in the current assignment
- Monitoring changes with time to observe any trends in blood lead or ZPP levels, even if they are within acceptable limits, as a sign of excessive exposure
- Assessing on the job sources of lead vs. other sources of lead (i.e. at home)

Medical examinations

Frequency

[name of company] shall ensure that employees are provided with medical examinations and consultations in accordance with 29 CFR 1926.62(j)(1) and (3) and 454 CMR 22.09(5)(a) through (g). Medical examinations will be provided by *[insert name of health care provider]* and shall be performed:

- as soon as possible, upon notification by an employee either that the employee has developed signs or symptoms commonly associated with lead intoxication; that the employee desires medical advice concerning the effects of current or past exposure to lead on the employee's ability to procreate a healthy child; that the employee is pregnant, or that the employee has demonstrated difficulty in breathing during a respirator fit test or during use, OR
- immediately following medical removal specified by 454 CMR 22.09(5)(b) or as medically appropriate as determined by a physician
- prior to engaging in lead abatement work
- annually for any employee who engages in lead abatement work and is exposed at or above the action level of 30 ug/m³

Elements of medical examination

- detailed work history and a medical history with particular attention to past lead exposure, personal habits and hygiene, and past or present gastrointestinal, hematological, renal, cardiovascular, reproductive and neurological problems
- thorough physical examination, with particular attention to teeth, gums, hematological, gastrointestinal, renal, cardiovascular, reproductive, neurological and pulmonary systems
- blood pressure measurement
- blood sample and analysis which determines
 - blood lead level
 - hemoglobin and hematocrit determinations, red cell indices, and examination of peripheral smear morphology
 - zinc protoporphyrin
 - blood urea nitrogen
 - serum creatinine
- routine urinalysis with microscopic examination
- any laboratory or other test relevant to lead exposure which the examining physician deems necessary by sound medical practices

All medical examinations shall be performed by or under the direction of a physician.

The employee may consult another doctor for a second opinion, to review initial results, or conduct an examination and laboratory testing.

Information provided to physician

The following information shall be provided to the physician conducting a medical examination or consultation pursuant to 454 CMR 22.09:

- a copy of 454 CMR 22.09 Worker Protection and Medical Monitoring Requirements; 454 CMR 22.11 Work Practices and Other Requirements for Renovation Work; 454 CMR 22.12, Work Practices and Other Requirements for Deleading Projects

- a description of the employee's duties as they relate to lead exposure or other harmful substances
- the employee's exposure level or anticipated exposure level to lead and/or any other toxic substances
- a description of any personal protective equipment used or to be used
- prior blood level determinations
- all prior written medical opinions in *[name of company]*'s possession or control

Employer's instructions to physicians

For any examination conducted for employees of *[name of company]*, the examining or consulting physician shall be instructed to:

- not reveal to the employer, either in a written statement of medical findings or in any other means of communication, any findings, including laboratory results, or diagnoses unrelated to the employee's occupational exposure to lead or ability to engage in deleading work
- advise the employee of any medical condition, occupational or non-occupational, which dictates further medical examination or treatment
- provide the employee with a clear warning of the reproductive hazards caused by exposure to lead.

Medical opinion

Within 2 working days after receipt of such records *[name of company]* shall obtain and furnish to the employee a copy of a written medical opinion from the physician which contains the following information:

- physician's opinion as to whether the employee has any detected medical condition which would place his/her health at increased risk of material impairment from exposure to lead
- any recommended special protective measures to be provided to the employee, or limitations to be placed upon the employee's activities which concern potential lead exposure
- any recommended limitation on the employee's use of respirators

Within 2 working days after receipt of the report of the employee's blood lead level, *[name of company]* shall furnish the employee with a copy thereof.

Blood lead level/ZPP monitoring

Frequency of testing

- All employees of *[name of company]* who conduct deleading work shall receive blood lead and ZPP monitoring every 2 months during the first 6 months following licensure or certification, and at least quarterly thereafter.
- Employees of *[name of company]* who conduct lead safe renovating work shall receive blood lead and ZPP monitoring every two months during the first 6 months and every 6 months thereafter.

- Any employee with a blood lead level at or above 25 ug/dl shall be tested at least every two months until 2 consecutive blood lead analyses indicate blood lead levels are below 25ug/dl
- When an employee is removed from deleading work, he/she shall receive blood lead and ZPP testing at least monthly during the period of medical removal.

Medical removal

Any employee whose blood lead levels is above 50ug/dl shall not be permitted to engage in deleading work. Such person shall immediately be removed from any lead exposure when the result of any single test of his/her blood lead level is at or above 50 ug/dl. In order to confirm the accuracy of the laboratory results, a second blood test shall be taken within two weeks.

Any employee medically removed from deleading work may return to his/her former job status when two consecutive blood sampling results indicate that the blood lead level is at or below 40 ug/dl

Blood lead testing laboratories

Blood lead samples shall be analyzed by the Department of Labor Standards, Occupational Hygiene Program, or by laboratories approved by OSHA-CDC for blood lead analyses within 7 calendar days. The blood lead testing laboratory shall report the results of all blood lead analyses to *[insert name of company]* and to the Department of Labor Standards.

Recordkeeping

name of company] shall retain the following employee information for at least 30 years after the employee leaves the job:

- name, social security number, and job description
- copy of physician's medical opinion
- results of medical examinations and blood lead testing
- results of air monitoring done for that employee and representative values provided to the physician
- results of all respirator fit testing
- any employee complaints related to lead exposure

[Name of company] will ensure that the physician keeps the following records:

- copy of medical examination results including the medical and work history provided by the employee
- description of the lab procedures, and a copy of any standards or references that the lab uses to interpret test results
- copy of all biological monitoring results