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Brunel Energy, Inc.

Lead Abatement / Removal

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1. Purpose

- 1.1. Brunel Energy, Inc., hereinafter referred to as, “the Company,” has established a program compliant with OSHA 1910.1025 and 29 CFR 1926.62 (e)(2)(ii)(A) through (I) and to advise employees in areas where lead is suspected.

2. Applicability

- 2.1. This policy applies to employees, subcontractors and/or visitor(s) of the Company. For the purposes of this policy, an employee shall be considered on the job whenever he/she is:
 - 2.1.1. On or in, any Company or client property, including parking areas; or
 - 2.1.2. On Company time even if off Company premises (including paid lunch, rest periods and periods of being on call).
- 2.2. As a condition of employment, Company employees are required to abide by additional governmental or customer policies and requirements that may be imposed at a worksite in addition to the requirements of these policies and procedures. Nothing set forth in this policy constitutes, construes, or interprets in any way as a contract of employment.

3. Responsibilities

- 3.1. Manager(s)
 - 3.1.1. Shall collaborate with Supervisors to develop and implement annual Lead Abatement and Removal training.
 - 3.1.2. Inform the Supervisors of upcoming work involving known or suspected lead containing materials, allowing them to provide any necessary monitoring or other required actions.
 - 3.1.3. Shall coordinate annual Lead Abatement and Removal training activities.
- 3.2. HSE Supervisor(s)
 - 3.2.1. Ensure personnel are aware of work that has the potential of exposure to lead.
 - 3.2.2. Identify locations where lead in the workplace may be found.
 - 3.2.3. Ensure employees comply with the Lead Abatement and Removal requirements.
- 3.3. Employee(s)
 - 3.3.1. Shall comply with the Lead Abatement and Removal requirements and direct any questions or concerns to their Supervisor.
 - 3.3.2. Attend required annual training.

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4. Procedure

4.1. Locations

- 4.1.1. When working on multi-contractor worksites the Company employees shall be protected from exposure.
- 4.1.2. Site Specific personal protection equipment will be provided to all employees at no charge, which will include but not be limited to; eye/face protection, skin protection and respiratory protection.
- 4.1.3. 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.
 - 4.1.3.1. The list is to be provided to the Manager on a quarterly basis and revised as lead containing materials are added or eliminated from the previous list.
- 4.1.4. A written site-specific lead compliance program shall be developed and implemented to reduce employee exposure to or below permissible limits.
- 4.1.5. No break rooms, lunchrooms or changing rooms shall be in areas with exposure to lead above the permissible exposure limit (PEL). Lunchroom, hygiene, shower, and changing facilities will be provided when exposures are above the permissible exposure limit PEL.
- 4.1.6. If employees are working immediately adjacent, the Company shall either remove the employees from the area until the enclosure breach is repaired or perform an initial exposure assessment.
- 4.1.7. No employees shall be exposed to a PEL of fifty micrograms per cubic meter of air.

4.2. Monitoring

- 4.2.1. Areas that are expected to contain lead shall be monitored and any area that is above the action level shall have follow up monitoring every six months until 2 consecutive results taken at least 7 days apart, are below the action level at which time the employer may discontinue monitoring for that employee.
- 4.2.2. If the initial monitoring reveals employee exposure is above the permissible exposure limit, the Company shall repeat monitoring quarterly. They shall continue monitoring at the required frequency until at least two consecutive measurements, taken at least 7 days apart, are below the PEL but at or above the action level at which time the employer shall repeat monitoring for that employee. Employees must be notified within 15 working days after the receipt of the results of monitoring performed, either individually in writing or by posting the results in an appropriate location that is accessible to affected employees.
- 4.2.3. Whenever the results indicate that the representative employee exposure, without regard to respirators, exceeds the permissible exposure limit, the Company shall include in the written notice a statement that the permissible exposure limit was

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exceeded, and a description of the corrective action taken or to be taken to reduce exposure to or below the permissible exposure limit.

4.3. Personal Protective Equipment

4.3.1. Employees will wash their 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.

4.3.2. 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.

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

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

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

4.3.6. If an employee is exposed to lead above the PEL, the Company shall provide at no cost to the employee, and assure that the employee uses, appropriate protective work clothing and equipment such as, but not limited to:

4.3.6.1. Coveralls or similar full-body work clothing

4.3.6.2. Gloves

4.3.6.3. Hats

4.3.6.4. Shoes or disposable shoe coverlets

4.3.6.5. Face shields, vented goggles, or other appropriate protective equipment.

4.3.7. The Company must provide appropriate National Institute for Occupational Safety and Health (NIOSH) certified respirators that have:

4.3.7.1. Full face-piece respirators instead of half mask respirators for protection against lead aerosols that cause eye or skin irritation at the use concentrations.

4.3.7.2. HEPA filters for powered and non-powered air-purifying respirators.

4.3.7.3. Powered air-purifying respirator (PAPR) instead of a negative pressure respirator when an employee chooses to use a PAPR, and it provides adequate protection to the employee.

4.3.8. All employees will follow Company's Respiratory Protection Program.

4.4. Health Effects of Lead

4.4.1. Common symptoms of acute lead poisoning are loss of appetite, nausea, vomiting, stomach cramps, constipation, difficulty in sleeping, fatigue, moodiness, headache,

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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.

- 4.4.2. A medical surveillance program is available for all employees who are or may be exposed above the action level for more than 30 days per year.
- 4.4.3. The Company shall ensure that all medical examinations and procedures are performed by or under the supervision of a licensed physician.
- 4.4.4. The Company shall provide the required medical surveillance without cost to employees and at a reasonable time and place.
- 4.4.5. Exposed employees will be medically monitored after exposure.
- 4.5. Warning Signs and Labels
 - 4.5.1. Employees must abide by any signs/labels/assessment reports indicating the presence of lead containing materials and will not disturb the lead containing material.
 - 4.5.2. Appropriate work practices shall be followed to ensure the lead containing materials are not disturbed.
 - 4.5.3. The Company will ensure that employees working in and adjacent to regulated areas comprehend the warning signs. Regulated access signs are to demarcate the lead exposure regulated work areas. The signs should be illuminated and clean and should read as follows:

DANGER

LEAD

MAY DAMAGE FERTILITY OR THE UNBORN CHILD

CAUSES DAMAGE TO THE CENTRAL NERVOUS SYSTEM

DO NOT EAT, DRINK OR SMOKE IN THIS AREA

5. Training

- 5.1. Lead Abatement and Removal 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 for all employees.
- 5.2. Employees with potential exposure to airborne lead at any level shall be informed of the content of OSHA 1910.1025 Appendices A and B of the Regulation.
- 5.3. Employees must be included if exposure to lead is at or above the action level, or if the possibility of skin or eye irritation exists.

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- 5.4. All training shall be documented including dates of training, location of training, employee name and trainer name.
- 5.5. Training will include the health effects of lead, how to report suspected locations of lead containing material and not to disturb any lead containing material.

6. Reference

- 6.1. OSHA 29 CFR 1926.62
- 6.2. OSHA 1910.1025
- 6.3. OSHA 1910.1025 App A
- 6.4. OSHA 1910.1025 App B