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# Brunel Energy, Inc.

## Lead Safety and Awareness

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### 1. Purpose

- 1.1. Brunel Energy, Inc., hereinafter referred to as, the “Company,” has established a program compliant with OSHA 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.

### 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 awareness 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 awareness 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 awareness requirements.
- 3.3. Employee(s)
  - 3.3.1. Shall comply with the lead awareness 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.
- 4.1.4. 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.
- 4.1.5. 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 are below the action level.
- 4.1.6. No employees shall be exposed to a PEL of fifty micrograms per cubic meter of air.
- 4.1.7. Employees shall be notified in writing of the air monitoring results and corrective actions taken.
- 4.1.8. A written site-specific lead compliance program shall be developed and implemented to reduce employee exposure to or below permissible limits.
- 4.1.9. No break rooms, lunchrooms or changing rooms shall be in areas with exposure to lead above the PEL. Lunchroom, hygiene, shower, and changing facilities will be provided when exposures are above the PEL.
- 4.1.10. If employees 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.

##### 4.2. Equipment

- 4.2.1. 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 Coordinator.
- 4.2.2. 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.
- 4.2.3. When using mechanical means to remove lead-containing paints or coatings, use equipment which is equipped with a HEPA collection system.
- 4.2.4. Whenever possible, use a wet system to reduce airborne dust.
- 4.2.5. Whenever possible, substitute lead material with non-leaded material.

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- 4.2.6. 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.
- 4.2.7. If respirators are required, they will be NIOSH certified, and all employees will follow the Company's Respiratory Protection Program.
- 4.3. Health Effects of Lead
  - 4.3.1. 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.
  - 4.3.2. A medical surveillance program is available for all employees who are or may be exposed above the action level for more than 30 days
  - 4.3.3. Exposed employees will be medically monitored after exposure.
  - 4.3.4. Warning Signs and Labels
  - 4.3.5. Employees must abide by any signs/labels/assessment reports indicating the presence of lead containing materials and will not disturb the lead containing material.
  - 4.3.6. Appropriate work practices shall be followed to ensure the lead containing materials are not disturbed.
  - 4.3.7. 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 read as follows:

**WARNING  
LEAD WORK AREA  
POISON  
NO SMOKING OR EATING**

## 5. Training

- 5.1. 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.
- 5.2. All training shall be documented including dates of training, location of training, employee name and trainer name.
- 5.3. 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.
- 5.4. Training records shall be provided upon request (all materials relating to the employee information and training program) to regulatory agencies.

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## 6. Reference

- 6.1. OSHA 29 CFR 1926.62