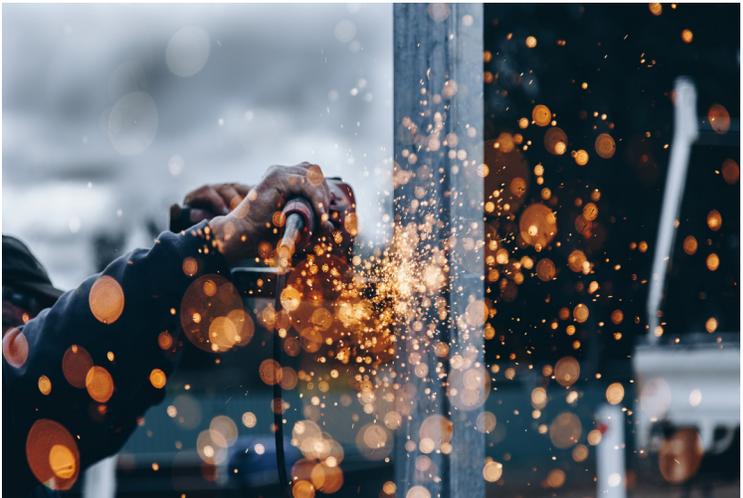


Construction Lead Standard What Employers Need to Know

December 2024

Changes to the construction lead standard, Title 8 California Code of Regulations (T8 CCR), go into effect on January 1, 2025. A flowchart of the main requirements and changes is included at the end of this summary. See T8 CCR section 1532.1 for specific requirements.

Important revisions to the construction lead standard include:

- A lower permissible exposure level (PEL) of 10 micrograms per cubic meter of air ($\mu\text{g}/\text{m}^3$) and action level (AL) of $2 \mu\text{g}/\text{m}^3$.
 - The designation of Level 1, 2, and 3 trigger tasks, along with trigger tasks not listed.
 - Many of the trigger tasks require a higher level of interim protections due to the lower PEL.
 - Additional interim worker exposure control measures for trigger tasks:
 - Eating facilities or areas.
 - Regulated areas.
 - Shower facilities for level 3 trigger tasks.
 - Dry abrasive blasting limited to 5 hours per day—2 hours per day beginning 1/1/30.
 - Follow-up employee airborne lead exposure monitoring:
 - Repeat worker exposure monitoring every 12 months when their exposures are determined to be above the AL, but below $30 \mu\text{g}/\text{m}^3$.
 - The requirement for a written lead compliance program:
 - Report of any engineering and work practice controls not implemented because of infeasibility, and how each was determined to be infeasible.
 - Written documentation of revisions and updates.
- 
- Personal protective equipment, clothing, and respirator requirements:
 - Provision of protective clothing at least daily where exposures exceed $30 \mu\text{g}/\text{m}^3$.
 - Hygiene facilities, practices, and regulated areas:
 - Employees exposed to any amount of lead must wash their hands, exposed arms and face before eating, drinking, entering eating areas, smoking, applying cosmetics and at the end of their shift.
 - Employees must not enter any personal vehicles (such as during breaks) with any PPE required to be worn.
 - Provide and ensure use of shower facilities, as interim protection, for employees performing level 3 trigger tasks.

(Continued on next page)

- Shower facilities must comply with T8CCR section 3366(f).
- Provide lunchroom facilities or areas as interim protection for employees engaged in Level 1, 2, and 3 trigger tasks, and trigger tasks not listed.
- Establish, implement and maintain effective written methods and schedules to maintain the cleanliness of drinking and washing facilities, change rooms, showers, lunchrooms, and eating areas.
- Establish regulated areas as interim protection where employees are engaged in Level 1, 2, and 3 trigger tasks, and trigger tasks not listed.
- Medical surveillance:
 - Provide initial blood lead testing for employees prior to assignment where exposure is reasonably expected to be at or above the AL, and as interim protection for employees engaged in Level 1, 2, and 3 trigger tasks, and trigger tasks not listed.
 - Provide medical surveillance for employees where exposure is reasonably expected to be at or above the AL, and as interim for employees engaged in Level 1, 2, and 3 trigger tasks, and trigger tasks not listed (unless there has been a negative initial determination).
 - Changes in blood testing requirements.
 - Information provided to the physician or other licensed health care professional (PLHCP) and the affected employees.
 - Changes in medical examinations and consultation requirements.
- Medical removal required at lower blood lead levels.
- Changes in the information that employees must be informed of.
 - Changes in the recordkeeping requirements, including for the written compliance program.
 - Changes in the language of signs designating regulated areas or areas where the AL may be exceeded.



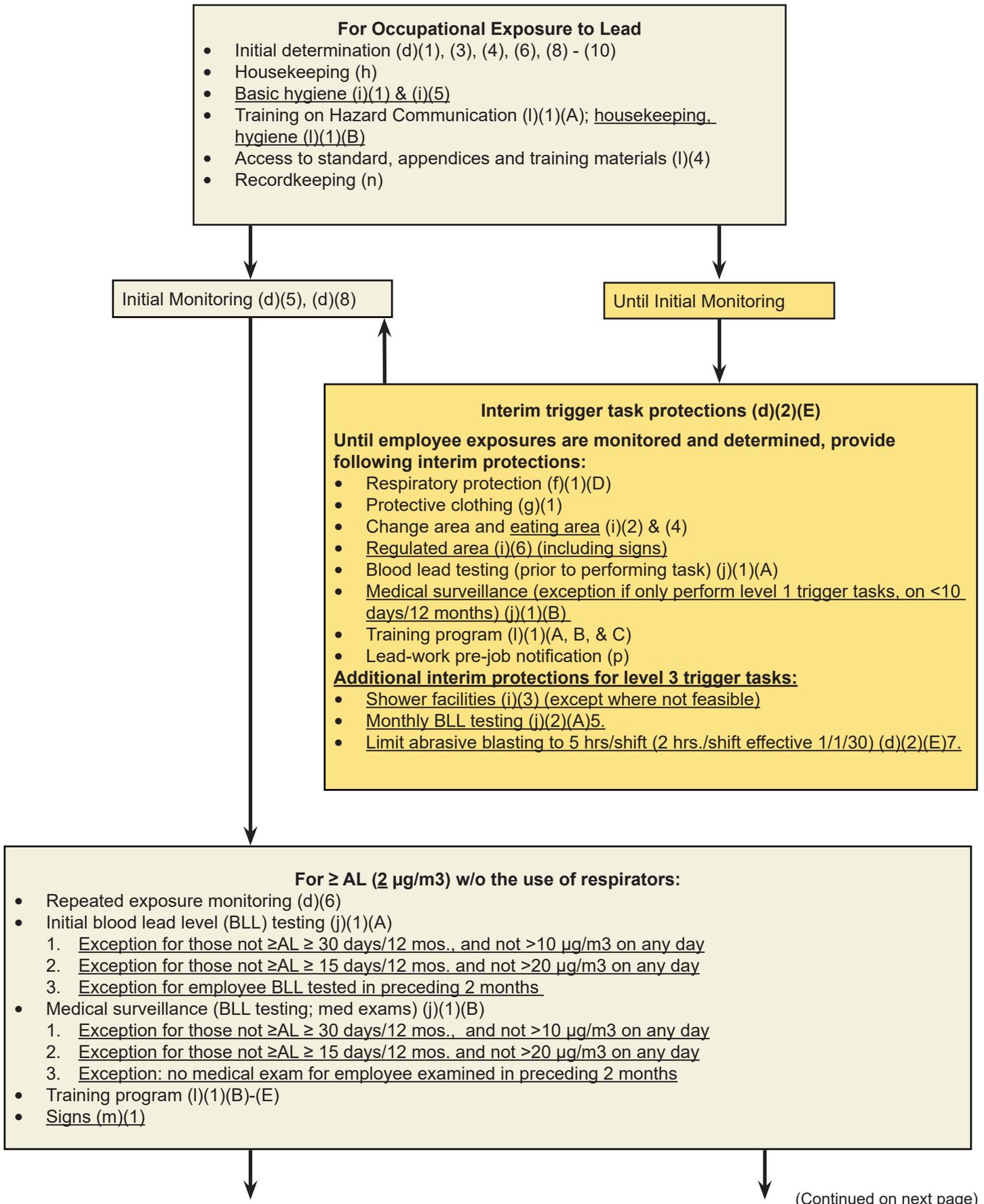
Resources

Cal/OSHA

- **T8 CCR, section 1532.1**
- **Publications**
 - **The Cal/OSHA Lead in Construction Regulation—A Guide for Employers**
 - Fact Sheets for **Employers and Employees**
 - **Model Lead in Construction Compliance Program**

Flowchart of Main Requirements of Section 1532.1

The revisions are underlined. Text that is not underlined is existing language.



↓

For BLL ≥ 10 µg/dl, < 20 µg/dl:

- BLL testing every 2 months (j)(2)(A)3.
- Elevated blood lead level response (j)(2)(E)

↓

For BLL ≥ 20 µg/dl:

- BLL testing every month (j)(2)(A)4.
- Elevated blood lead level response (j)(2)(E)
- Medical exam, ASAP and annual (j)(3)

↓

Medical Removal Protection (MRP)

Criteria for Removal: (k)(1) & (2)

- 1 BLL ≥ 30 µg/dl; or
- Effective 1/1/26: Last 2 BLLs ≥ 20 µg/dl, or average BLL in last 6 mos. ≥ 20 µg/dl (except if last BLL < 15 µg/dl); or
- Final medical determination

Temporary removal from: (k)(1)

- Work ≥ AL (2 µg/m³)
- Work involving a trigger task when no exposure assessment has been conducted, or altering or disturbing lead materials

Medical Services:

- Medical exam ASAP & as medically appropriate (j)(3)(A)
- BLL testing at least monthly (j)(2)(A)3.

Return to Work due to: (k)(3)

- 2 consecutive BLLs < 15 µg/dl (at least 30 days apart); or
- Subsequent final medical determination

↓

For > PEL (10 µg/m³) w/o the use of respirators, apply these additional protections:

Respirators

- To reduce exposure to ≤ PEL (accounting for respirator use):
 - Implement interim use of respirators (c), (f)
 - Then, after implementing required exposure controls, use supplemental respiratory protection if needed

Other Controls:

- Implement exposure controls (e)(1)
- Written compliance program (e)(2)
- Protective work clothing & equipment (g)
- Full hygiene requirements (i), including change rooms, showers > 50 µg/m³ (except where not feasible), eating areas and regulated areas

December 2024



For assistance with developing a lead compliance program, employers may contact Cal/OSHA Consultation Services at 1 800 963 9424 or InfoCons@dir.ca.gov
For Consultation information or publications, access the following link or copy the site address: www.dir.ca.gov/dosh/consultation.html
©2024 California Department of Industrial Relations

