



OSHA REGIONAL NOTICE

U.S. DEPARTMENT OF LABOR

Occupational Safety and Health Administration

DIRECTIVE NUMBER: 03-00-009

EFFECTIVE DATE: October 1, 2014

SUBJECT: Regional Emphasis Program - Lead

REGIONAL IDENTIFIER: Atlanta Regional Notice CPL 2

ABSTRACT

Purpose: This instruction implements in Region IV the National Emphasis Program (NEP) to reduce occupational exposures to lead.

Scope: This Notice applies to all area offices in Region IV

References: OSHA Instruction CPL 03-00-009, NEP for Lead
OSHA Notice CPL 02-00-150, Field Operations Manual (FOM)
OSHA Instruction CPL 02-00-025, Scheduling Systems for Programmed Inspections
OSHA Instruction CPL 04-00-001, Procedures for Approval of Local Emphasis Programs (LEP's) and Appendix A, Program Evaluation Items for Local Emphasis Programs

Cancellations: This Notice replaces and updates an earlier version.

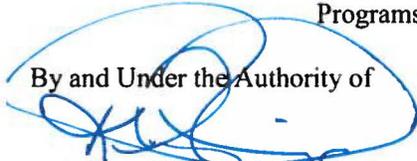
State Impact: None

Action Offices: Area Offices

Originating Office: Atlanta Regional Office

Contact: Benjamin Ross, Assistant Regional Administrator for Enforcement Programs, 678-237-0400

By and Under the Authority of



KURT A. PETERMEYER
Regional Administrator

Executive Summary

This instruction establishes a Regional Emphasis Program to reduce occupational lead exposures. The REP also ensures effective targeting, enforcement and outreach for lead hazards in response to the National Emphasis Program for Lead.

Significant Changes

None

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SUBJECT: Regional Emphasis Program for the implementation of the National Emphasis Program for lead.

I. **PURPOSE.** Regional Emphasis Program for the implementation of the National Emphasis Program for lead.

II. **SCOPE.** This REP applies to all area offices in Region IV.

III. **REFERENCES.**

Directive Number: CPL 03-00-009, NEP for Lead

OSHA Notice CPL 02-00-150, Field Operations Manual (FOM)

OSHA Instruction CPL 04-00-001, Procedures for Approval of Local Emphasis Programs (LEPs) and Appendix A, Program Evaluation Items for Local Emphasis Programs

OSHA Instruction CPL 02-00-025, Scheduling System for Programmed Inspections

Other references in Directive Number: CPL 03-00-009

IV. **EXPIRATION.** This notice expires within one year of the effective date, unless extended.

V. **ACTION.** OSHA compliance personnel shall follow the procedures contained in this notice when conducting outreach and enforcement activities.

VI. **BACKGROUND.** Lead overexposure is one of the most common overexposures found in industry and is a leading cause of workplace illness. Therefore, OSHA has established the reduction of lead exposure to be a high strategic priority. OSHA's five-year strategic plan sets a performance goal of a 15% reduction in the average severity of lead exposure or employee blood lead levels in selected industries and workplaces.

Lead adversely affects numerous body systems and causes forms of health impairment and disease that arise after periods of exposure as short as a few days (acute exposure) or as long as several years (chronic exposure). The frequency and severity of medical symptoms increases with the concentration of lead in the blood. 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, anemia, and decreased sexual drive.

Acute health poisoning from uncontrolled occupational exposures has resulted in fatalities. Long-term (chronic) overexposure to lead may result in severe damage to the blood-forming, nervous, urinary, and reproductive systems.

VII. PROCEDURES.

- A. As required by the lead NEP, all inspections regardless of the industry, where the compliance officer determines that there is a potential employee exposure to lead, the inspection shall be counted under the NEP, and coded as a strategic plan lead inspection.
- B. For the purpose of the REP, only those inspections where the employees are evaluated for their exposures to lead are to be coded as LEP inspections in addition to being coded for IMIS as required by the NEP.
- C. All inspections covered by this REP shall be conducted according to instructions contained in the NEP.
- D. Before scheduling programmed inspections under the REP, the required inspections under NEP shall be conducted:
 - 1. Follow-up inspections at all establishments where lead exposures were measured at or above permissible exposure limits,
 - 2. Inspections of all fixed establishments with documented exposures above the action level where “employers have not taken preventive/corrective actions for such violations of medical surveillance and monitoring provisions of the lead standards.
 - 3. Any reports of employees with blood lead level at or above 25 µg/dL.
- E. Other Inspections:
 - 1. All complaints or referrals that indicate that employees are being exposed to lead shall be scheduled for inspection.
 - 2. The compliance office shall evaluate potential employee lead during any inspection conducted at an establishment of the type referenced in the NEP.

VIII. SCHEDULING OF INSPECTIONS.

- A. All establishments that were cited for lead exposures within the past ten Fiscal Years shall be scheduled for inspection unless the establishments are inspected or scheduled for inspection under paragraph VII above.
- B. Where no inspections result from the procedure in paragraphs VII, and VIII.A.,

the Area Director shall compile a list of establishments based on Paragraph X. A. of the NEP. Adjustments to the list for additions and deletions will follow guidelines in CPL 02-00-025, paragraph B.1.b.(1)(b)6.

1. After the establishment list for the area office has been adjusted as necessary, establishments on the list shall be numbered consecutively beginning with the number one, skipping deletions. Using a random number method and following the guidelines in OSHA Instruction CPL 02-00-025, Appendix C, a local inspection register shall be developed in each area office. Establishments will be selected in the order prescribed by the random numbers until the total of establishments selected equals the number of projected inspections for the year. The resulting list shall constitute the program inspection register.
2. Establishments may be selected from the inspection register for inspection in an order that makes efficient use of available resources. If any establishment on the inspection register is documented to be unavailable for inspection, the next originally unscheduled establishment according to the application of the random number table shall replace it on the inspection register. It is anticipated that safety hazards will be identified during the course of these inspections and referrals will be made to appropriate staff to address the safety hazards noted.

IX. INSPECTION PROCEDURES. All inspection procedures shall be conducted in accordance with Paragraph XI of the NEP.

X. RECORDING IN OIS. Instructions contained in Paragraph XII shall be followed in coding inspections NEP lead inspections. In addition, the Inspection Forms for all inspections conducted in establishments that are covered by this REP shall be coded as local emphasis program inspections and marked "LEAD."

XI. EVALUATION:

- A. Area Director's Responsibility: The area director affected by this regional emphasis program shall submit to the ARA for Enforcement Programs by October 31, of each year an evaluation report that shall include the following elements:
 1. The goal of the program
 2. The area director's opinion of how effective the program was in meeting its goal.
 3. Data and information to support the conclusions stated in (2) above including:
 - a) enforcement statistics;

- b) serious hazards eliminated;
 - c) number of times engineering controls cited,
 - d) number of violations cited relating to overexposures to lead; and
 - e) number of lead standard violations that were cited.
4. Statement of whether the program should be continued, accompanied by a brief rationale.
 5. Description of any legal issues that arose which would necessitate a review by the Solicitor before renewal of the program could be approved.
 6. Any other comments or recommendations, including findings that might have an impact on how OSHA or the industry does business.
- B. Regional Office Responsibility: Based on the area director's evaluation and any other pertinent information, Enforcement Programs will prepare an evaluation of this program for the Regional Administrator's submission to the national office as required by current instructions.

DISTRIBUTION: All Area Offices
 Enforcement Programs
 Regional Solicitor
 Cooperative and State Programs
 Administrative Programs

APPENDIX A

CPL 03-00-009

OSHA Instruction: National Emphasis Program-Lead

http://www.osha.gov/OshDoc/Directive_pdf/CPL_03-00-0009.pdf