

Summary of Changes DEP Lead Management Procedure

Procedure Section	Summary of Changes	Discussion of Effect on DEP Staff	Regulatory Requirement	Effect on Contractor Work Rules
Throughout	Removed references to lead in paint.	Paint related issues are covered by the Paint Management Policy. This new Lead Management revision covers lead in materials other than paint.	NA	NA
Section 5 – Responsibilities	<p>Added Bureau EHS responsibilities to include identifying expected work tasks that might expose employees to lead and to notify OEHS when personal or area monitoring activities will be undertaken.</p> <p>Added Employee responsibilities for attending training, not disturbing lead-containing pipes/equipment, not engaging in salvage or demolition activities without a prior EHS assessment or safe work plan, and participating in biological monitoring when required.</p> <p>Added Contract Supervisor as a title with responsibilities.</p>	<p>This change was made because Bureau EHS may have more technical expertise and resources to accomplish these tasks.</p> <p>These changes were made from the previous revision to provide an even safer work environment for the employee.</p> <p>The previous revision did not delegate responsibilities to the Contract Supervisor. Contractors are exposed to lead and will be more protected by having this layer of responsibility incorporated into the policy.</p>	NA	NA
Section 6 – Procedure	<p>Removed Low Risk Job procedure.</p> <p>Provided procedure for Employee Notification and Observation using General Industry and Construction standards.</p> <p>Medical Examination and Surveillance has been added to the revision.</p>	<p>This change was made because this section of the previous revision only provided guidance on activities related to paint.</p> <p>The revision makes it easier for the Agency to comply with notification standards depending upon if the exposure happened under a General Industry standard or a Construction standard.</p> <p>This element was lacking in the previous revision and now provides guidance on examinations and consultations.</p>	<p>NA</p> <p>29 CFR 1910.1025(d)(8)</p> <p>29 CFR 1926.26(d)(8)</p>	NA
Section 9 – Metrics and Auditing	Added section to document that lead management will be audited periodically.	This policy has elements that will be tracked and audited in accordance with the EHS Compliance and Continuous Improvement policy.	NA	NA