

Document Health & Safety	Published 01/01/1998	Valid for Escanaba Mill
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## Document: Lead Program

### Purpose

The purpose of this program is to establish standard operating procedures for the safe handling of lead and lead-based paint to eliminate or reduce airborne exposures in the Escanaba Mill. The program is designed for the protection of employees when engaged in activities involving lead and lead-based paint.

### Responsibility

Responsibility for administration of the Lead Program is that of Safety staff and appropriate area supervision. The program will be reviewed annually by the Safety Department and if necessary, the Safety Leadership Committee.

### Extent

The program applies to all maintenance and contractor employees, which in the course of their job have to work with or remove lead coatings. All paint throughout the mill is considered lead-containing and therefore, must first be removed with vacuum assisted tools (VAT) prior to welding, burning, torch cutting, grinding, etc. on the base material.

For lead and lead-based paint abatement activities, contractors performing work must comply with the Lead Standard, 29 CFR Part 1910.1025 and MIOSHA Part 310 Lead in General Industry

### Materials Which May Contain Lead

Paint; babbitting materials; batteries; pipes and other metal joints; electrical solder, conduit and wiring; and more

### Exposure Limits & Action Level

The Occupational Safety and Health Administration (OSHA) has established a permissible exposure limit for lead of 50 micrograms per cubic centimeter ( $\mu\text{g}/\text{M}^3$ ) as an eight-hour time-weighted average (TWA), and an action level of 30  $\mu\text{g}/\text{M}^3$  as an eight-hour TWA. An action level is a concentration that when exceeded appropriate administrative, engineering, or work practice controls must be implemented to reduce exposures.

## Employee Protection

### *Competent Person*



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The Safety Department shall be responsible for the oversight of the provisions of the written Lead Program, employee exposure monitoring and to identify lead-containing materials as necessary.

### ***Exposure Monitoring & Assessments***

Industrial hygiene monitoring was conducted on the initial use of vacuum-assisted tools in Escanaba and determined to effectively protect the employee from airborne exposures to lead well below the action level when used properly. As a result, the OSHA Lead Standard and its provisions are not required. On-going monitoring will be conducted periodically to evaluate the Lead Program, its effectiveness and employee use.

All operations conducted without vacuum-assisted tools must be approved by the Safety Department. If an operation will have potential for exposure above the action level a job-specific work plan will be developed according to 29 CFR 1926.62, to lower or eliminate exposures to lead.

### ***Vacuum-Assisted Tools***

Vacuum-assisted tools (VAT) in lead and lead paint removal activities, are considered an engineering control and are designed to eliminate and/or reduce exposures and capture dust and debris for proper disposal. VATs have a special dust collection attachment or shroud that is connected to a high-efficiency particulate air (HEPA) equipped vacuum. These tools are electrically powered, as many of the areas in our mill do not have access to mill air. Pneumatic VAT tools are available and may be purchased by area supervision, if interested.

#### *4½ Grinder Attachment*

The attachment shroud fits on 4½ grinders and is designed for the removal of coatings on flat steel or columns

#### *Versa Tools*

The tool is designed for rolled steel and pipe, such as hand rail and guarding, and offers special notches to conform to the pipe and achieve proper containment.

#### *Needle Gun*

The needle gun is designed for corners and hard-to-reach areas.



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### *Other Types of VAT*

Other type of vacuum-assisted tools may be used for the protection of employees. All other methods and tools must be approved by the Safety Department.

### ***Work Practices With VAT and HEPA Equipped Vacuums***

Work practices are steps the individual employee can take to reduce airborne exposures, such as holding a tool in a certain way. The following are work practices the employee is expected to use with each job:

- The vacuum must be turned on before the tool and turned off after the tool. This is done to provide negative pressure to the tool to capture debris while still in operation.
- Never lift the tool from the work surface while the tool is in operation. Once containment is established, a break of containment or lifting the tool could cause contaminated material to become airborne.
- Care must be taken not to disturb lead dust when changing vacuum bag
- Cumulative paint removal shall be limited to one hour per employee per shift.
- Four inch heated affected zone surrounding surface to be cut, weld, etc. Vacuum-assisted tool must be used to clear the paint from this four inch zone where heat could cause hazardous fumes to be released.
- Vacuum work surfaces and floor after each job to remove visible debris that escaped the VAT.

### ***Housekeeping***

All surfaces shall be kept free of accumulations of lead and lead-based paint. In addition, all *Lead Paint Removal Tool* cabinets and lead tools shall be kept clean, and free of all visible paint debris from the shelves, tools and shrouds shall be vacuumed off after each tool use. Clean-up of paint debris shall be conducted with HEPA equipped vacuums only.

### ***Medical Surveillance***

Blood-lead analysis shall be offered whenever an employee is exposed to lead at or above the action level. If an employee exposure to lead at or above the action level occurs for more than 30 days per year, then additional medical surveillance is required. Proper use of the vacuum-assisted tool should eliminate or reduce potential exposures to lead.



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### ***Employee Education & Training***

The Safety Department will be responsible for developing periodic training programs on lead and lead-based paint as necessary. Area supervisory personnel are responsible for ensuring that affected employees complete the training requirements. Employees shall be trained in the following requirements prior to using vacuum-assisted tools in lead-based paint activities:

- a) OSHA Lead Standard and how it pertains to Verso - Escanaba
- b) why vacuum-assisted tools are necessary
- c) how to properly use vacuum-assisted tools and related equipment
- d) how to safely change vacuum-cleaner bags
- e) procedures for cleaning and storing equipment
- f) limitations and capabilities of vacuum-assisted tools
- g) lead, its health effects and hazards
- h) OSHA/MIOSHA exposure limits
- i) medical surveillance
- j) written program

### ***Recordkeeping***

Initial and periodic exposure assessments are the responsibility of the Safety Department and are available for all employees to review. Records of employee training will be maintained in Safety and the Health Services group shall maintain those of medical surveillance.

## **VII. Waste Disposal**

All lead-based paint debris and waste generated by Verso employees shall be sealed in a six-mil polyethylene bag and placed in a sealed bucket. Bags and buckets are available at Stores. Environmental must be notified and the waste taken to the hazardous waste locker as soon as possible. Locker is located in #3 Mill, Building 86 across from the waste oil tanker cars.



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All lead waste generated by the contractors must be placed in sealed drums. Notify Environmental as soon as possible for TCLP testing to determine if classified as hazardous waste. Environmental will inform on proper holding procedures.

**VIII. Contractors**

Contractors engaged in lead and lead-based paint activities at Verso shall be held to the mandates outlined by the OSHA standard, Lead in Construction, 29 CFR 1926.62. Each job conducted by contractors where suspected lead-containing materials are present will require notification to the Safety Department.

