

Lead: California Proposal vs. Current Federal Rules

Subject & Section	California Proposed	Federal Current	California Current
Action Level: GISO §5198(a) & CSO §1532.1(a)	2 µg/M³	30 µg/M³	30 µg/M³
Permissible Exposure Limit: GISO §5198(c)(1) & CSO §1532.1(c)(1)	10 µg/M³	50 µg/M³	50 µg/M³
PEL Exception: CSO §1532.(c)(1)	PEL for abrasive blasting 25 µg/M³ for 5 years.	None	None
Exposure monitoring: GISO §5198(d)(1)	Employer to collect personal samples for full shift.	Employer to collect samples for 7 continuous hours.	Employer to collect samples for 7 continuous hours.
Interim Protections: GISO §5198(d)(2)(A-E)	Appropriate respiratory protection includes at N, R, or P-100 half-mask respirators; note that half-mask respirators might not be adequate for some tasks.	None	Requires appropriate half-mask respirators.
Construction Exposure Assessment: CSO §1532(d)(2)(A-E)	Requires protection of employees prior to assessment of exposure. Three levels of trigger tasks; until exposure assessment is complete, assume employee is exposed above the PEL; Level 2, assume exposure in excess of 100 µg/M³; Level 3, exposure in excess of µg/M³.	"Trigger task" is not used, but Fed-OSHA applies a similar concept, but at much lower PEL level assumptions.	"Trigger task" is not used, but Fed-OSHA applies a similar concept, but at much lower PEL level assumptions.
Trigger Level 3 Interim Protections: CSO §(d)(2)(E) (4-9)	Shower, eating and regulated areas, a limit on the maximum time an employee can conduct dry abrasive blasting to five hours a day, going down to two hours a day five years after the effective date of the regulation, medical surveillance and training.	Hand-washing facilities only, biological monitoring consisting of blood sampling; training under Hazcom standard and on respirator use.	Hand-washing facilities only, biological monitoring consisting of blood sampling; training under Hazcom standard and on respirator use.
Initial Determination: CSO §1532(d)(6)(B) and GISO §5198(d)(7)(C)	If initial or subsequent determination shows employee exposure at the action level but below 30 µg/M³, the employer shall monitor at least every 12 months until two consecutive tests taken a week apart are below the action level. If at or above 30 but below 50, testing repeats every six months until below AL.	No requirement above AL but below 30, but monitoring required every six months at federal AL but below the PEL.	No requirement above AL but below 30, but monitoring required every six months at federal AL but below the PEL.
Separate Engineering Control Air Limit (SECAL): GISO §5198(e)(1)(B)	Separate SECALs specified for particular processes. For instance, oxide production in lead acid battery manufacturing, the SECAL limit would be 50 µg/M³ initially, then 40 five years later.	None	Engineering, work practice and administrative controls to maintain employee exposure at or below the PEL
Methods of Compliance: GISO §5198(e)(2)(B)(3), CSO §(e)(2) (B)(3)	Employer's report of engineering and work practice controls considered, but not implemented in meeting the PEL must include an explanation of how they were determined to be infeasible.	Requires a report of the technology considered in meeting the PEL	Requires a report of the technology considered in meeting the PEL
Housekeeping: GISO §5198(h) (2)(B), CSO §1532.1(h)(2)	Floors and other surfaces where lead accumulates shall be cleaned, when possible, by vacuuming or other methods that minimize lead becoming airborne. Shoveling, dry or wet sweeping and brushing not allowed unless the employer can demonstrate that vacuuming, etc., is not effective.	None	Similar to proposed. Does not require employer to demonstrate ineffectiveness of vacuuming, etc.
Hygiene Facilities, Practices & Regulated Areas: GISO §5198(i) (1), CSO §1532.1(i)(1)	Employer shall ensure that in areas where employees are exposed to lead, that food and beverages, tobacco and cosmetics are not used or applied. Employers shall provide an adequate number of washing facilities or lavatories. When necessary, employer shall make available special cleansing skin. Employers shall ensure employees exposed to lead wash their hands and other exposed areas.	Some hygiene requirements effective when exposure is above PEL. Fed-OSHA does not have special cleaning compound requirement.	Some hygiene requirements effective when exposure is above PEL. Cal/OSHA does not have special cleaning compound requirement.
Medical Surveillance: GISO §5198(j) and CSO §1532.1(j)	Required for all employees who are or may be exposed at or above the action level for 10 or more days in any 12 consecutive months, and as an interim protection for all employees who perform presumed hazardous lead work. Some exceptions.	Medical surveillance required for employees exposed at or above the action level for 30 or more days per 12 consecutive months.	Medical surveillance required for employees exposed at or above the action level for 30 or more days per 12 consecutive months.
Blood Lead Testing: GISO §5198(j)(2), CSO §1532.1(j)(2)	Testing for employees noted above, initially, then every two months for the first six months, then every six months after that. Testing monthly for employees performing Level 3 construction trigger tasks, or in GI, for employees whose last BLL was above 20 micrograms per deciliter, and for employees whose airborne exposure is above 500 µg/M³.	Every six months generally, and monthly for employees whose BLL is at least 20 micrograms per deciliter, during removal period and for those performing Level 3 construction trigger tasks.	Every six months generally, and monthly for employees whose BLL is at least 20 micrograms per deciliter, during removal period and for those performing Level 3 construction trigger tasks.
Medical Examinations & Consultations: GISO §5198(j) (2)(C)(2), CSO §1532.1 (j)(2)(C) (2)	Employers required to make medical examinations and consultations available to employees exposed at or above the action level, and as interim protection for those performing PHLW.	None	None
Medical Removal: GISO §5198(k) and CSO §1532.1(k)	GI: temporary removal for employees at or above the AL, altering or disturbing any material containing lead at least 0.5% by weight, or torch cutting scrap metal; or 1 year from effective date, 2 blood tests at least 20 µg/dl. Construction: work above the AL involving a trigger task or disturbing material with a 0.5% lead concentration.	Temporary removal due to elevated BLL -- at action level, and last test showing 60 µg/dl for GI, 50 for construction.	Temporary removal due to elevated BLL -- at action level, and last test showing 60 µg/dl for GI, 50 for construction.

Provided by Cal-OSHA Reporter