

# DOSH Lead Compliance Data

Terry Walley, DOSH Compliance Operations Manager  
Lead Rules Stakeholder Meeting December 14, 2015





## What Do These ERs Have In Common?

- Rubber roller refurbishing
- Apartment complex
- Lumber mill





## Lead Can Be Everywhere

- **Lead**, atomic number of 82
  - Very soft, blue-gray, metallic element
  - Usually alloyed with other elements
  - Water pipes in ancient Rome were made of lead
- Located at the end of three major decay chains
  - Regenerated from decay of heavier elements
  - Due to regeneration, lead is a very abundant element for its high atomic number
- Lead is three times as abundant as platinum, ten times as mercury, and twenty times as gold





## Not Surprising

- Foundries
- Fishing weights
- Radiator repair
- Engine rebuild
- Battery manufacturing
- Bridge painting
- Commercial/Residential painting
- Bullet manufacturing
- Firing ranges





## General Industry: WAC 296-62-07521 Lead

- Chapter 62 Part I Airborne Contaminants (Specific)
  - PEL
  - Exposure monitoring
  - Controls
  - PPE
  - Housekeeping
  - Hygiene
  - Medical
  - Training
  - Recordkeeping





## Construction: WAC 296-155-176 Lead

- Chptr 155 Part B-1 Occ. Health and Environ. Control
  - PEL
  - Exposure assessment (trigger tasks)
  - Monitoring
  - Methods of compliance
  - PPE
  - Housekeeping
  - Hygiene
  - Medical
  - Training
  - Recordkeeping







## LEAD INSPECTIONS FOR GENERAL INDUSTRY & CONSTRUCTION 2005 to 2015

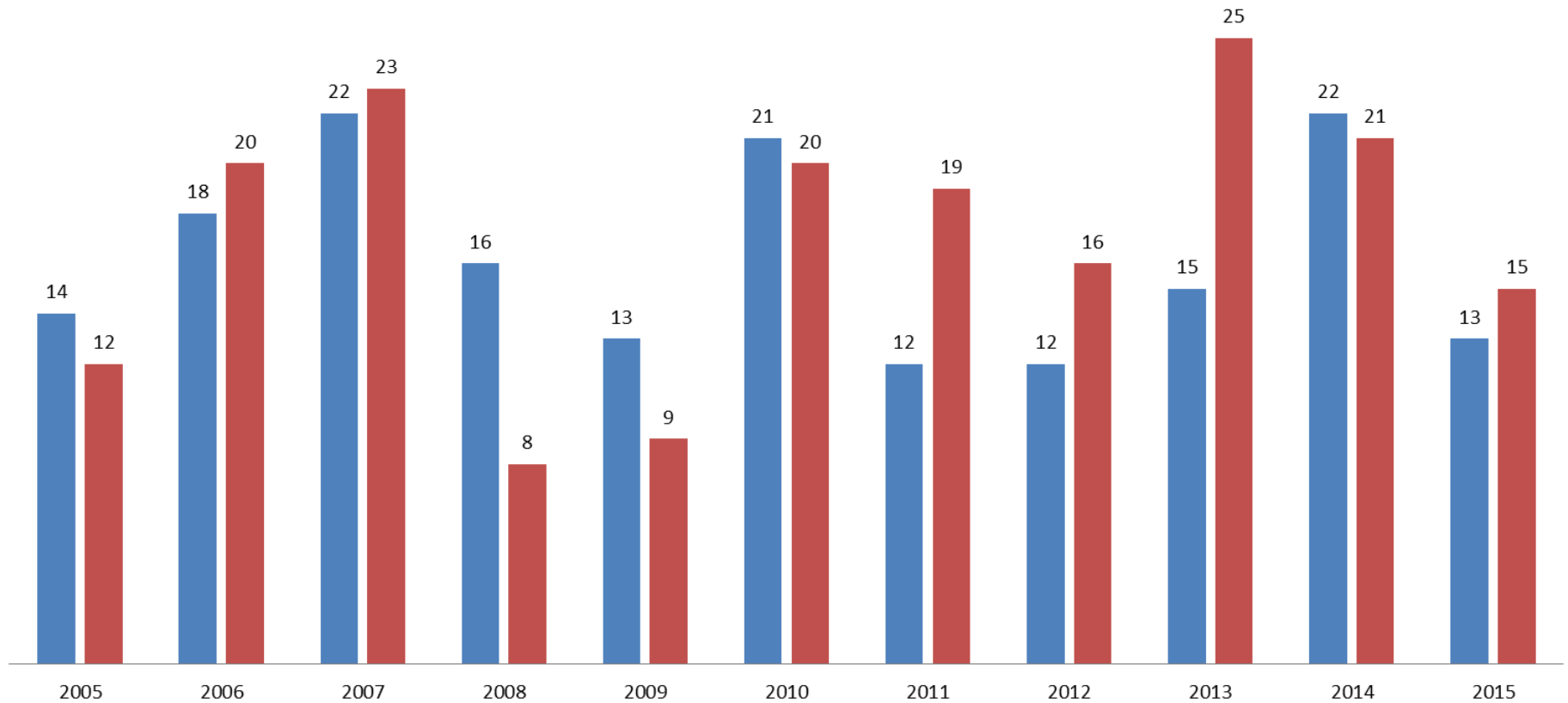
Citation Issued Year	2005	2006	2007	2008	2009	2010
General Industry	14	18	22	16	13	21
Construction	12	20	23	8	9	20
Total	26	38	45	24	22	41

Citation Issued Year	2011	2012	2013	2014	2015	Total 2005-15
General Industry	12	12	15	22	13	178
Construction	19	16	25	21	15	188
Total	31	28	40	43	28	366



## Lead Inspections For General Industry and Construction 2005-2015

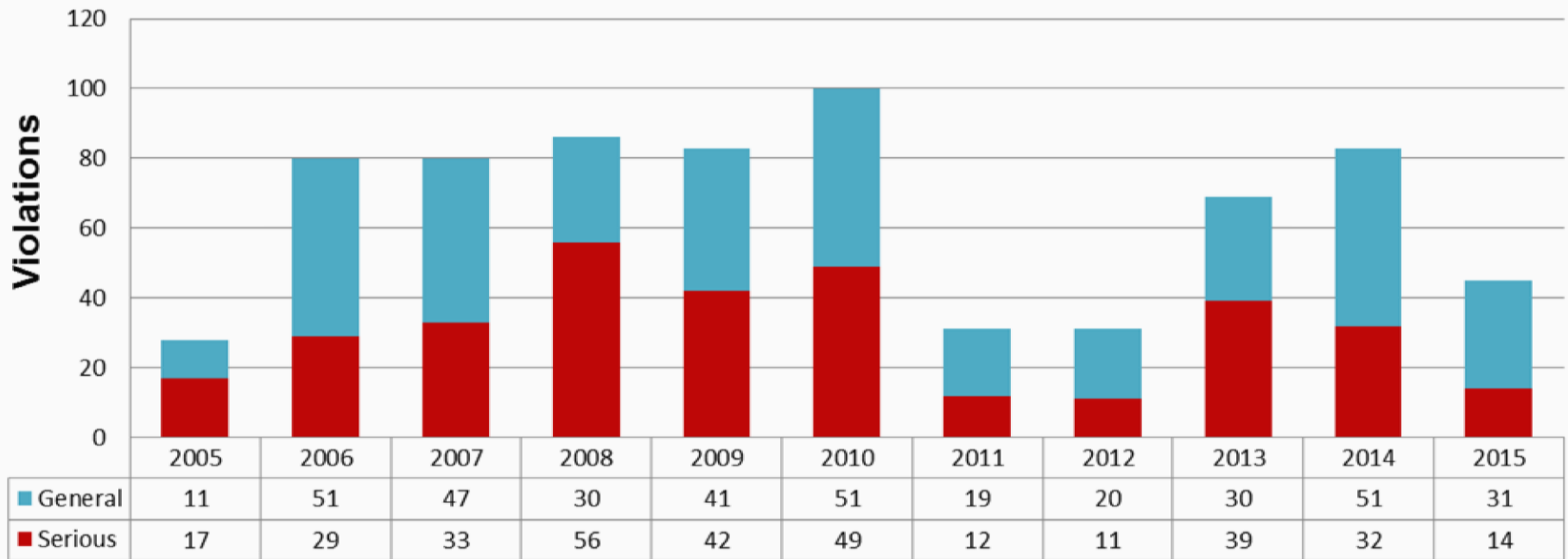
■ General Industry ■ Construction







## GENERAL INDUSTRY LEAD VIOLATIONS CY 2005 - 2015



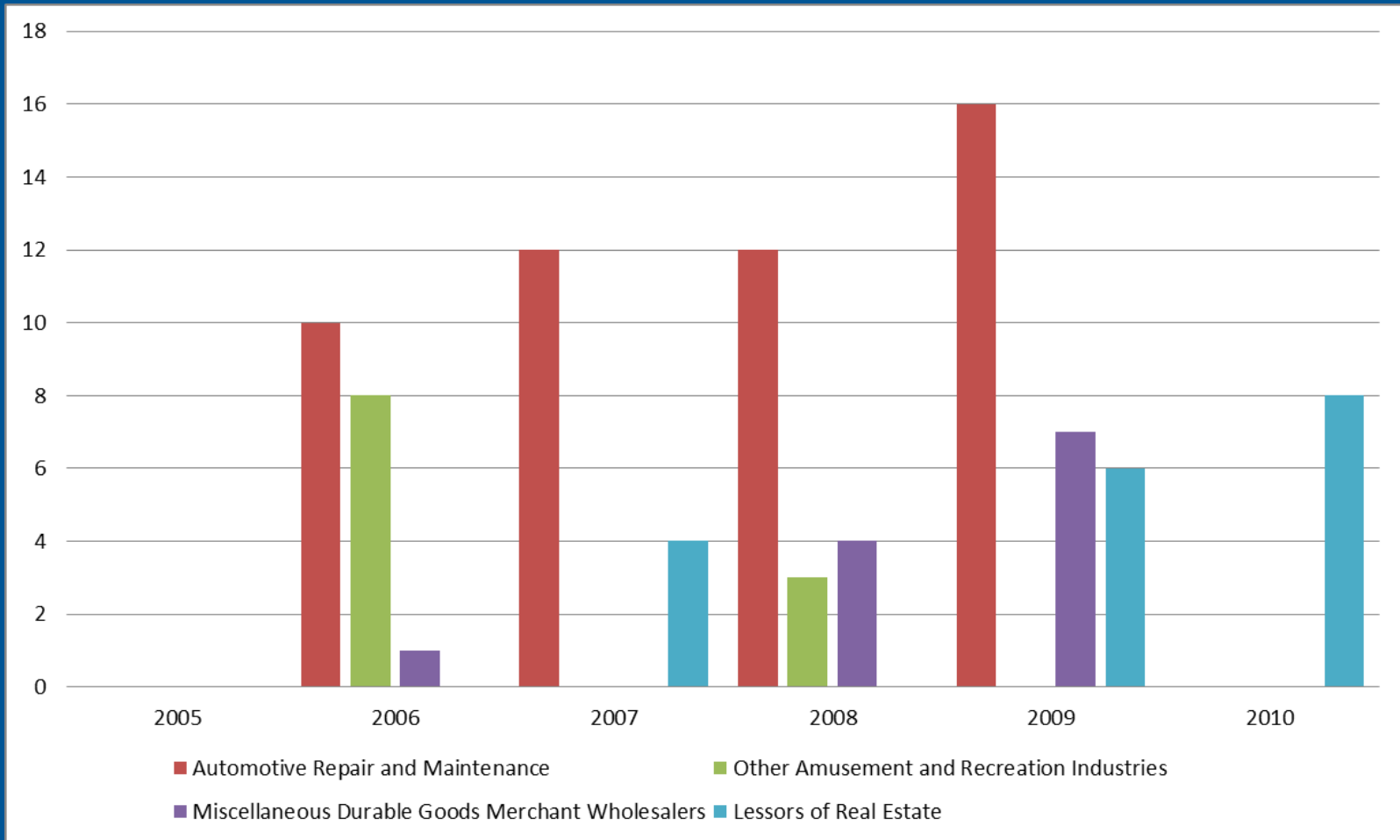


### TOP 10 GENERAL INDUSTRY WACs CITED FOR LEAD CY 2005-2015

WAC Code	Times Cited	Cited Percent of Inspections	Code Summary
296-62-07521(13)(a)(i)	54	30%	Follow Appendix A (Substance Data Sheet For Occupational Exposure to Lead) & Appendix B (Employee Standard) Summary) if you have lead in the workplace
296-62-07521(5)(b)	41	23%	Determine if there are lead levels above action level.
296-155-17609(1)(a)	22	12%	Determine if any employee may be exposed to lead at or above the action level.
296-62-07521(13)(a)(iv)	19	11%	Train annually
296-62-07521(3)(a)	14	8%	Asses the hazards and provide hazard information to employees
296-62-07521(5)(a)(ii)	13	7%	Collect lead exposure data from the full shift for each job.
296-62-07521(6)(c)(i)	12	7%	Provide appropriate respirators for employees
296-62-07521(9)(b)(ii)	11	6%	Only use other cleaning methods when you can not vacuum
296-62-07521(6)(d)(i)	11	6%	Monthly testing of ventilation must be completed
296-62-07521(9)(b)(i)	2	1%	Do not clean surfaces or floors with compressed air



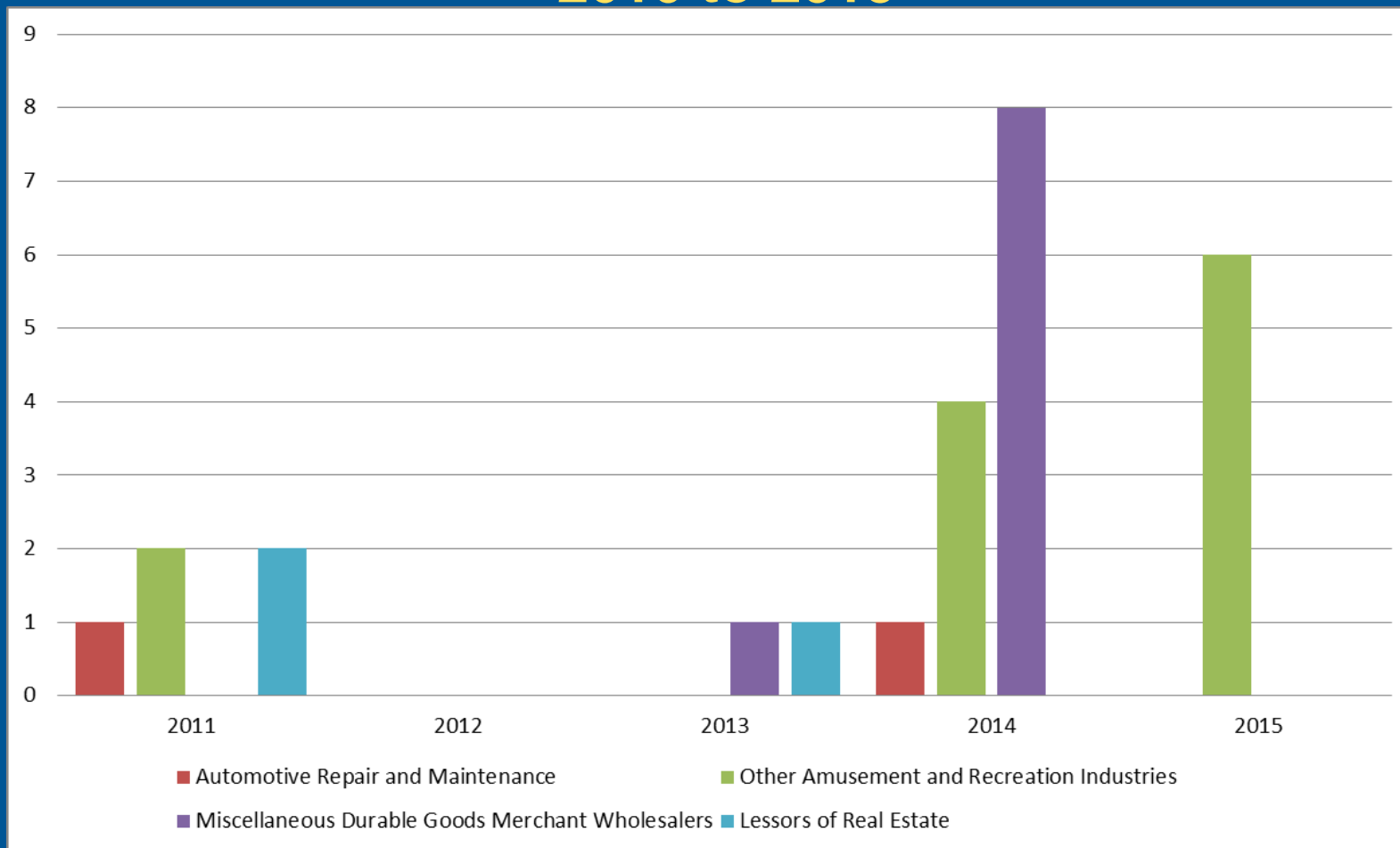
## Top Four General Industries With Serious Violations 2005 to 2010





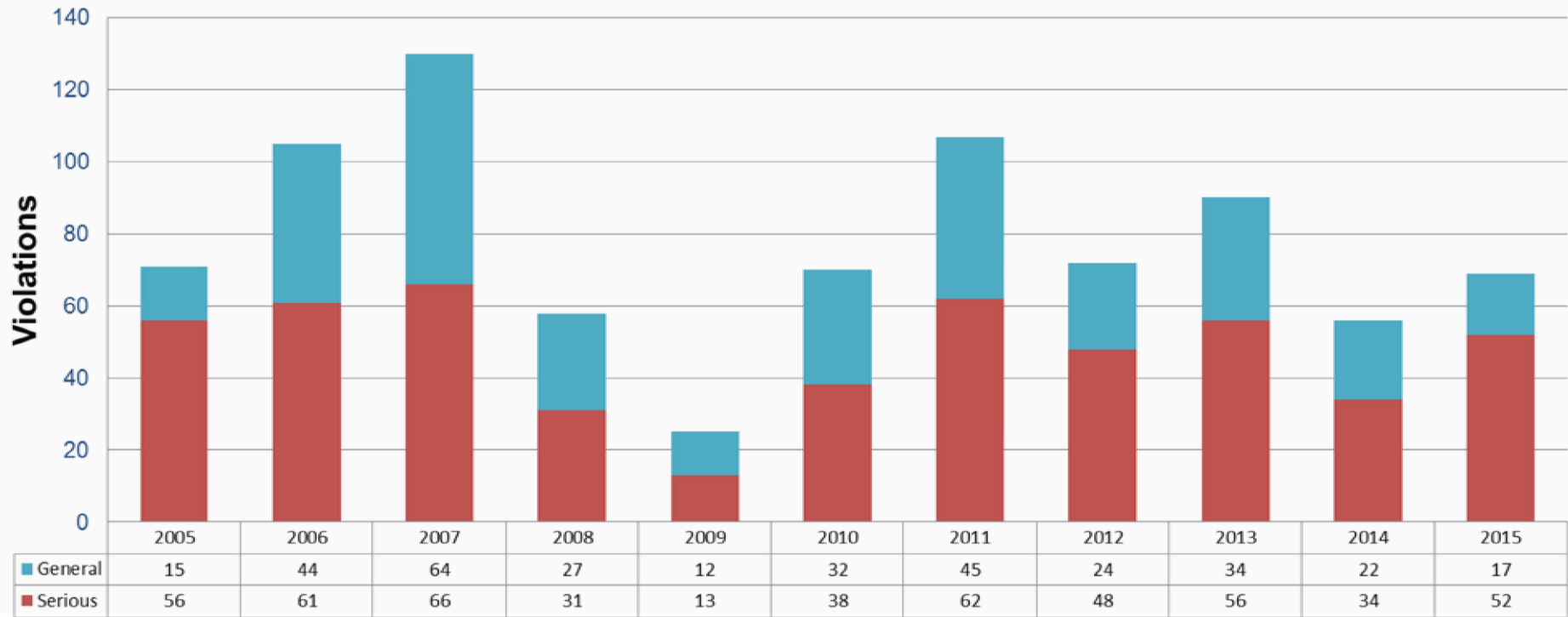


## Top Four General Industries With Serious Violations 2010 to 2015





## CONSTRUCTION INDUSTRY LEAD VIOLATIONS CY 2005 - 2015





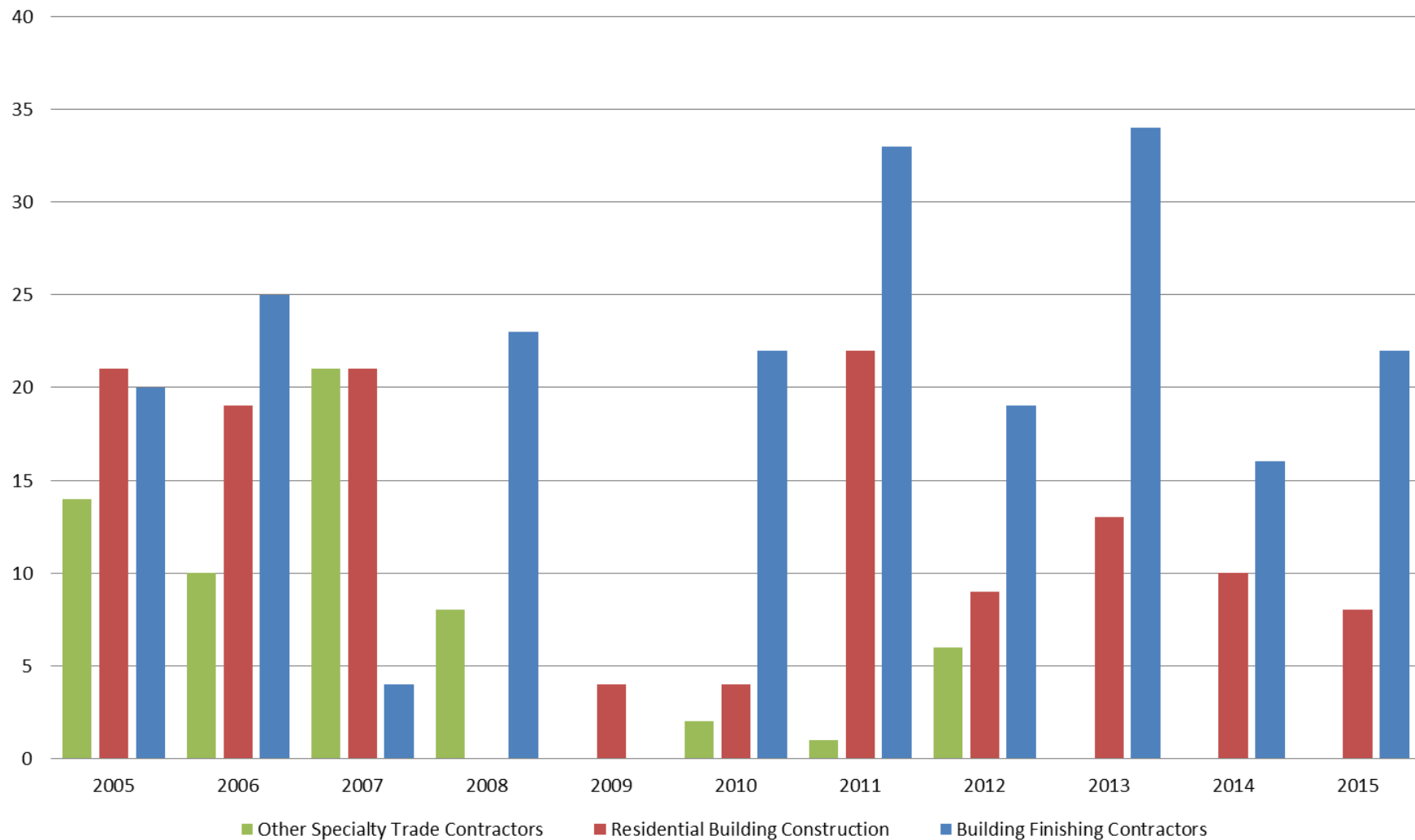
## TOP 10 CONSTRUCTION INDUSTRY WACs CITED FOR LEAD CY 2005 - 2015

WAC Code	Times Cited	Cited Percent of Inspections	Code Summary
296-155-17609(1)(a)	98	52%	Determine if lead exposure could occur
296-155-17611(2)(a)	52	28%	Establish written compliance program
296-155-17625(1)(a)	47	25%	Hazard communication
296-155-17619(5)(a)	40	21%	Handwashing
296-155-17621(1)(a)	40	21%	Medical surveillance
296-155-17619(2)(a)	39	21%	Change areas
296-155-17609(2)(e)(i)	35	19%	Provide respiratory protection
296-155-17613(1)(d)	35	19%	Employer must provide respirators if required
296-155-17609(2)(e)(ii)	33	18%	Tasks performed and protection provided
296-155-17609(2)(e)(iii)	31	16%	Provide employees change areas
296-155-17617(1)	31	16%	Keep surfaces free as practicable of accumulations of lead.





## Top Three Construction Industries With Serious Violations






## General Industry vs. Construction Violations

	Avg. vios. per insp.	Avg. General vios. per insp.	Avg. Serious vios. per insp.
General Industry	4.02	2.15	1.88
Construction	4.54	1.79	2.75



# Where We Are Today



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# NEWS

[Communication Services](#) 360-902-5400 ■ [PublicAffairs@Lni.wa.gov](mailto:PublicAffairs@Lni.wa.gov)

## Bellevue gun shop cited for exposing workers to lead

[More news releases](#)

May 14, 2013

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**Tumwater** – The Department of Labor & Industries (L&I) has fined a King County gun shop \$23,480 for exposing workers to health hazards caused by lead exposure. Wade's Eastside Gun Shop, Inc. in Bellevue was cited for 17 violations of worker safety and health rules at the business's indoor firing range.

Exposure to airborne and settled lead dust at firing ranges is a well-known hazard that puts employees, instructors and customers at risk for lead poisoning. Workers are exposed to lead in firing ranges when they clean the range, clean firearms, empty bullet traps or sort brass.

The exposures occurred late last summer and fall when the gun range was undergoing extensive





## Where We Are Today

- LEP Firing Ranges
  - 35 Employers
  - 19 Compliance
  - 1 Consultation
- NEPs
  - Primary metals
  - Nursing homes
  - Isocyanates
  - PSM





## Where We Are Today

Priority	Category
1st	Imminent Danger
2nd	Fatality/Catastrophe Investigations
3rd	Complaints/Referrals - that meet criteria for an inspection – See <a href="#">Chapter 2, Section D., Evaluating Complaints and Referrals.</a>
4th	Follow-up or Monitoring Inspections
5th	Programmed Inspections



## Where We Are Today

- College Pro Painters







# DOSH Lead Compliance Data Questions?







# DOSH Lead Compliance Data

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