



Industrial Performance Services

Industrial Tubular Catalyst Services

LEAD AWARENESS PROCEDURE

Lead Awareness Procedure

January 2023

Purpose

The purpose of this procedure is to advise employees in areas where lead is suspected on an awareness level basis about the properties and dangers of lead, general guidelines, and training requirements. For more information refer to the Lead safety procedure for IPS★ITCS.

Scope

This procedure applies to IPS★ITCS operations where employees whose work activities may contact lead containing materials but do not disturb the material during their work activities. When work is performed on a non-owned or operated site, the operator's program shall take precedence, however, this document covers IPS★ITCS employees and contractors and shall be used on owned premises, or when an operator's program doesn't exist or is less stringent.

Responsibilities

Managers and Supervisors

- In coordination with the HSEQT Manager, develop and implement annual lead awareness training.
- Ensure personnel are aware of work that has the potential of exposure to lead.
- Identify possible locations where lead in the workplace may be found.
- Inform the HSEQT Manager of upcoming work involving known or suspected lead-containing materials, allowing the HSEQT Manager to provide any necessary monitoring or other required actions.
- Ensure employees comply with the lead awareness requirements.

HSEQT Manager:

- Coordinate annual lead awareness training activities.

Employees:

- Comply with the lead awareness requirements and direct any questions or concerns to the HSEQT Manager.
- Attend required annual training.
- Review material safety data sheets or consult with the supervisor to identify any container with lead-containing material.

Procedure

Health Effects of Lead

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, and anemia. Long term (chronic) overexposure to lead may result in severe damage to the blood-forming, nervous, urinary, and reproductive systems.

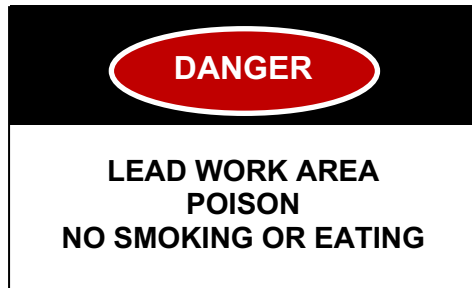
Locations

Each worksite shall create a list of possible locations of lead containing materials such as leaded paints, leaded solders, pipes, batteries, circuit boards, cathode ray tubes, leaded glass, and demolition/salvage materials.

The list is to be provided to the HSEQT Manager on a quarterly basis and revised as lead containing materials are added or eliminated from the previous list.

General Requirements

Employees must abide by any signs/labels/assessment reports indicating the presence of lead containing materials and will not disturb the lead containing material. Appropriate work practices shall be followed to ensure the lead containing materials are not disturbed. Regulated access signs are to demarcate the lead exposure regulated work areas. The signs should read as follows:



General Work Practices

When working on multi-contractor worksites IPS★ITCS employees shall be protected from exposure. If employees working immediately adjacent to a lead abatement activity are exposed to lead due to the inadequate containment of such job, IPS★ITCS shall either remove the employees from the area until the enclosure breach is repaired or perform an initial exposure assessment.

Employees will wash hands and face if lead materials are contacted. Employees' hands and faces shall be washed if lead containing materials are contacted. Any possible contact with lead containing material must be reported immediately to the supervisor or HSEQT Manager.

If air is recirculated back into the workplace, the system must be equipped with a HEPA (high efficiency particulate air) and backup filter, and a system to monitor the lead level will be installed.

When using mechanical means to remove lead-containing paints or coatings, use equipment which is equipped with a HEPA collection system

Whenever possible, use a wet system to reduce airborne dust.

Whenever possible, substitute lead material with non-lead material

Respirators shall be used during the time period required to install or implement control if engineering and work practices are insufficient as well as for emergency use.

If respirators are required, they will be NIOSH certified, and all employees will follow the IPS★ITCS Respiratory Protection Program.

Training

Lead awareness training is required at time of hire, during orientation or before initial assignment in areas where lead is suspected, and annual refresher training is conducted. Lead awareness training is required for employees whose work activities may contact lead containing materials but do not disturb the material during their work activities. Lead awareness training is required at time of hire, during orientation, or before assignment to areas containing lead.

Refresher training must be given annually.

Documentation of training - Lead awareness training shall be documented including dates of training, location of training, employee name and trainer name.

Training will include the health effects of lead, how to report suspected locations of lead containing material and not to disturb any possible lead containing material.

Training records shall be provided upon request all materials relating to the employee information and training program to regulatory agencies.

Competency Assessment

No.	Questionnaire	C/NYC
Q1		
A1		
Q2		
A2		
Q3		
A3		
Q4		
A4		
Q5		
A5		

Enclosed Attachments	
Risk Assessment	<input checked="" type="checkbox"/>
Environmental Aspect and Impact	<input checked="" type="checkbox"/>
Training and Competency	<input checked="" type="checkbox"/>
Measure and Evaluation Tools	<input checked="" type="checkbox"/>

Competency Checklist

To be filled out by Trainer and signed by Employee, Assessor and Supervisor before being returned to the HSEQT Manager for recording purposes.

Procedure	Competency	Date	Competent YES / NO	Employee Signature

(Please tick appropriate box)

This employee is competent in performing the job.

This employee has not attained the competency level.

*

* *If the employee has not attained all competency levels, the General Manager must assess the action to be taken, provide an extension of training or alternative action as listed below.*

Alternate action to be taken: _____

Signed By	Employee:	_____	Date:	_____
	Trainer:	_____	Date:	_____
	Assessor:	_____	Date:	_____
	Regional Manager:	_____	Date:	_____

Environmental Aspects and Impacts

Identified Environmental Aspects and Impacts

The following table is a summary of the likely environmental aspects and impacts that may be identified during site inspections. The significance of each impact needs to be assessed using the Risk Assessment Model.

Activity	Aspect	Impact
Purchasing & Administrative Work	Consumption of goods	Conservation of natural resources
	Consumption of energy (eg. Electrical equipment and facilities)	Release of greenhouse gases and atmospheric pollution; Consumption of natural resources; Habitat loss
	Generation of waste (eg. Paper)	Consumption of space for waste disposal; Habitat loss
Climate Control	Consumption of energy	Release of greenhouse gases and atmospheric pollution; Consumption of natural resources; Habitat loss
	Generation of noise	Disturbance to community; Habitat loss
Cleaning of – offices / vehicles	Storage, use and release of chemicals	Contamination of air, water or soil; Risk to human health
Transport (Fleet vehicles / staff travel)	Consumption of energy	Release of greenhouse gases and atmospheric pollution; Consumption of natural resources; Loss of habitat at all stages of generation; Light pollution
	Consumption of goods (eg. Oil)	Consumption of natural resources; Generation of waste; Habitat loss; Biodiversity impacts
	Generation of waste (eg. Oil)	Consumption of space for waste disposal; Potential contamination of water or soil; Habitat loss
	Exhaust emission	Release of greenhouse gases and atmospheric pollution
	Use of dangerous goods (eg. Batteries)	Potential contamination of air, water or soil; Risk to human health
	Generation of noise	Disturbance to community; Habitat degradation
Operations		

Sample only.
To be filled in

Risk Assessment

Risk Assessment // insert name here					
Step No: Logical sequence	Sequence of Basic Job Steps documented in the Procedure, Work Instruction and project plans. Break down Job into steps. Each step should be logical and accomplish a major task.	Potential Safety & Environmental Hazards/Impacts at the site of the Job Identify the actual and potential health and safety hazards and the environmental impacts associated with each step of the job.	Risk Rating Refer to the risk matrix or HSEQT.PRO. Risk Mgt	Recommended Corrective Action or Procedure <i>Determine the corrective actions necessary to reduce the risk to as low as reasonably practical (ALARP) refer to HSEQ.PRO.Risk Mgt. The risk must be reduced or controlled to ALARP before work commences.</i> Document who is responsible for implementing the controls to manage each hazard identified.	Risk Rating refer to the risk matrix or HSEQT.PRO.Risk Mgt
1.					
2.					
3.					
4.					
5.					

Audit



Process: insert// Procedure: Insert //		Date:		Audited by:	
		Location of Audit:		Area Mgr/Supervisor:	
Item	Question	Evidence Sited	Comments		Conformance Score 0,3,5
1.					
2.					
3.					
4.					
5.					
6.					
7.					
AUDITOR'S SIGNATURE:		CONFORMANCE SCORE: / 25		0 – Non-Conformance	
SAFETY REP'S SIGNATURE:		CONFORMANCE %:		3 – Continuous Improvement Opportunity	
				5 – Total Conformance	