# LEAD CONTROL PROGRAM

## PURPOSE:

To prevent and control occupational exposure to lead through engineering controls, safe work practices, and personal protective equipment. The lead work Standard Operating Procedure (SOP) will provide guidance for the processes that will be followed for the request, risk assessment and execution of lead work by Brant Community Healthcare System (BCHS) employees and contracted services.

## POLICY STATEMENT:

BCHS is committed to ensuring the health and safety of all employees, professional staff, contractors, volunteers and affiliates. Under section 30 of the Occupational Health and Safety Act (OHSA), it requires all project owners to identify any designated substances on a construction project before beginning a project. The organization has an obligation to determine whether designated substances are present in an area that will be repaired or demolished as well as at the project site. A list of all such substances that are present will be prepared, referred to as the designated substance survey (DSS), and available to BCHS staff and shared with the constructor and any contractors, in advance of tendering and/or construction activities.

**The Joint Health and Safety Committee (JHSC) shall be notified of any lead sampling before it takes place. JHSC members have the right to be present for such testing.** Documentation related to assessments, investigations, corrective actions, remediation activities, and communications shall be maintained in accordance with organizational record-keeping requirements.

## INCLUSION CRITERIA

This policy and its procedures for lead work applies to the BGH and Willett sites.

- If the presence of lead is suspected/likely but not confirmed, the owner or constructor of the work must treat the work as a lead operation unless proven otherwise
- All lead work shall be coordinated by the designated Project Designate in consultation with Organizational Health. Infection Prevention and Control (IPAC) shall be consulted as required. Depending on the nature of the work, the Project Designate may be a representative from Facilities & Maintenance, Capital Planning, Corporate Infrastructure,

**DISCLAIMER**: This is a CONTROLLED document. The most current version is in electronic format on the BCHS intranet site. Any documents appearing in paper form are NOT controlled.

or another designated department. Infection Prevention and Control will be consulted as required.

- The work may commence with the highest reasonable level of precautions in place.
- Inspection and monitoring of the work area will be completed prior, during and after completion of the lead work by the most responsible or competent person.
- Sufficient time for sampling should be provided and communicated if no samples are available.
- The lead work shall only be completed by staff and contracted service that are trained in working around or with lead containing materials
- No BCHS staff member will participate in any lead work that is classed above 2a and will require documented training in awareness and lead work procedures prior to participating.
- All Lead Operations 2b- 3b will be completed by a 3rd party.

Not all work activities involving LCM would be classified as lead work. Insignificant work activities generate no visible dust and disturbance is minimal. The following examples would be considered Insignificant:

- Installing isolated fasteners (e.g. nails, screws, anchors)
- Minor single penetrations into painted surfaces
- Sampling of suspected lead-containing materials
- Application of encapsulants, coatings, or paint over intact lead-containing surfaces
- Washing or cleaning intact lead-containing painted surfaces
- Minor short-duration maintenance activities with minimal disturbance

General measures should always be considered and PPE, dust suppression tools and basic controls for the protection of the worker and individuals occupying the space is an expectation of anyone conducting work in any BCHS site.

## DEFINITION(S):

**Damp Wiping***:* A cleaning process for removing residual contamination using damp-cloths, sponges or mops.

**Designated Substance:** Under the Occupational Health and Safety Act (OHSA), owners are responsible for informing contractors of the presence of designated substance during the tendering process and prior to signing a binding agreement. This notification should be given in writing, such as a pre-construction survey, a designated substance report, or a designated

**DISCLAIMER**: This is a CONTROLLED document. The most current version is in electronic format on the BCHS intranet site. Any documents appearing in paper form are NOT controlled.

substance summary report (DSSR) and should be provided in the tender. This disclosure process also applies to employers when workers may come in contact with a substance and must be done prior to the work commencement or as soon as awareness is known.

**Dust Collection system**: an engineering control, that controls airborne lead concentration levels (measured on the worker) to below 0.05 mg/m3.

**Dust Suppression:** Measures taken to reduce the release of dust during work procedures such as wet methods (wetting surfaces, wet scraping and wet shovelling)

**Environmental Abatement Council of Canada (EACC)**

**Fume Collection system/smoke eater**: an engineering control, that controls airborne lead concentration levels (measured on the worker) to below 0.05 mg/m3. effective source control and capture velocity, minimum of 0.5 metres per second (100 feet per minute) at the work surface.

**Infection Control Risk assessment:**

**Insignificant Work Activities:** not classified as lead work operations where disturbance is minimal and visible dust generation does not occur.

**Lead:** is a malleable metal that can cause acute and chronic health effects. It is an additive and contaminant that is routinely found in building materials like pain and surface coatings.

**Lead Class:** EACC classes tasks involved in the lead work process by the risk of exposure associated with the task. Classes are rated 1, 2 and 3. Class 3 is rated the highest exposure risk and will always be completed by a trained contracted service. BCHS employees will not participate in Class 2b- 3b lead operations.

**Lead Containing Materials (LCM**) Building materials comprising of lead or which contain lead

**Lead Work Operations:** the description and guidelines for application, installation, disturbance or removal of lead-containing material. Based on EACC guidelines, operations will include procedural directives for use, disturbance, construction and demolition as well as control measures and procedures for exposure prevention, hoarding and disposal, Personal Protection Equipment and communication practices.

**Lead Work Risk Assessment Tool: (LWRA)**

**Project Designate:** The individual assigned by BCHS to coordinate and oversee lead-related work activities. Depending on the nature and scope of the work, the Project Designate may be a representative from Facilities & Maintenance, Capital Planning, Corporate Infrastructure, or

**DISCLAIMER**: This is a CONTROLLED document. The most current version is in electronic format on the BCHS intranet site. Any documents appearing in paper form are NOT controlled.

another designated department. The Project Designate is responsible for coordinating risk assessments, contractor activities, communications, documentation, and regulatory compliance requirements.

**Work Area**: Where the actual work activity takes place and within the area designated as restricted access.

## PROCEDURE:

**Assessment, Testing and Sampling Requirements**

The Project Designate shall review available information, including the Designated Substance Survey (DSS), Lead Audit Survey, historical records, and project scope, to determine whether lead-containing materials may be present and whether additional testing or sampling is required.

**Testing or Sampling is Required When:**

- The presence of lead-containing materials is suspected but has not been confirmed.
- The Lead Audit Survey, DSS, or other records do not adequately identify the materials that will be disturbed.
- Demolition, renovation, repair, maintenance, or construction activities will disturb painted surfaces or materials of unknown composition.
- Existing survey information is unavailable, outdated, or does not reflect current site conditions.
- Regulatory, project, consultant, or contractor requirements necessitate confirmation of lead content.
- Air monitoring or exposure assessment is required to evaluate worker exposure or verify the effectiveness of control measures.

**Testing or Sampling is Generally Not Required When:**

- The Lead Audit Survey, DSS, or laboratory results confirm the presence or absence of lead-containing materials in the affected work area.
- Existing records are representative of the materials being disturbed and sufficient to determine the required controls.

**DISCLAIMER**: This is a CONTROLLED document. The most current version is in electronic format on the BCHS intranet site. Any documents appearing in paper form are NOT controlled.

- The work is classified as an insignificant work activity and will not significantly disturb lead-containing materials.

**Where Testing Cannot Be Completed**

Where testing results are unavailable before work begins, the material shall be presumed to contain lead and the work shall proceed using the highest reasonable level of controls until testing results are obtained.

## GENERAL MEASURES FOR CLASS1,2A,2B AND 3A,3B.

The following is a list of general measures and procedures shall apply to all lead work activities involving known or suspected lead containing or lead based materials. The Project Designate shall ensure a competent person evaluates the work, determines the appropriate lead work classification, and establishes the required control measures prior to commencement of work.

1) **Washing/Hygiene facilities**
   consisting of a wash basin, clean water, soap and disposable towels shall be provided and maintained in or near the work area.
   Workers shall:
   a) wash hands and face before eating, drinking, smoking or leaving the work area
   b) clean or remove contaminated footwear prior to leaving the work area
   c) not eat, drink, chew gum or smoke in the work area;
2) **Protection of Work Area**

   Drop sheets or polyethylene sheeting shall be used below all lead work operations and cover porous, non wipeable or difficult to clean surfaces, equipment, furnishings and materials within or adjacent to the work area which produce or may produce dust, chips, or debris containing lead
3) **Signage, Isolation and Restricted Access**
   Approved signage will be posted outside the work area restricting access to authorized persons only with lead work and contact person clearly labelled. Where hoarding and containment is required, inspection and documentation by a competent person is required.
4) **Dust Suppression and Work Practices**
   Lead-Containing dust generation shall always be minimized. All tools, equipment, barriers, and accessible work surfaces shall be cleaned prior to removal from the work area. Dry

**DISCLAIMER**: This is a CONTROLLED document. The most current version is in electronic format on the BCHS intranet site. Any documents appearing in paper form are NOT controlled.

sweeping and use of compressed air may disperse lead-containing dust and is prohibited in the work area.

a) Equipment and/or tools with dust controlling HEPA -Filtered attachments will be used if available.
b) Wet methods shall be used for clean up of any lead-containing dust or waste from a work area or from clothing
c) Damp wiping clean-up after each operation shall be done to prevent lead contamination and exposure to lead;
d) Only HEPA filtering equipped vacuum shall be used

5) **Waste Handling and Disposal**

Dust and waste including debris, disposable PPE, cleaning materials, and contaminated materials shall be cleaned up at regular intervals and placed in a container that is:

a) dust tight and sealed in a bag suitable to prevent tearing
b) identified as containing lead waste
c) cleaned externally with a damp cloth or a vacuum equipped with a HEPA filter immediately before being removed from the work area
d) removed from the workplace frequently and at regular intervals

6) **Terminal Cleaning**

The work area will have a terminal clean by the most responsible party prior to:

a) removal of hoarding
b) re-occupancy
c) Reopening of ventilation
d) Return to normal operations

## ADDITIONAL CONTROL MEASURES AND PROCEDURES BY LEAD CLASS

General measures and procedures for all lead work shall apply in addition to the following class-specific requirements.

**Class 1: General Measures**

There are no additional control measures for Class 1 lead work with general measures implemented. Fit tested half-face respirators should be worn with P100 or the appropriate Organic/Vapor cartridges.

**Class 2a: Additional Control Measures**

**Monitoring & Oversight**

a) Lead Work Risk Assessment Tool

**DISCLAIMER**: This is a CONTROLLED document. The most current version is in electronic format on the BCHS intranet site. Any documents appearing in paper form are NOT controlled.

b) Infection Control Risk Assessment Matrix
c) Approval from the Project Designate prior to commencement of work.
d) Exposure assessment for workers may be completed
*(repeated, extended, or higher dust-generating activities)*

**Engineering Controls**

a) Implement hoarding and HVAC protection LWRA and ICRA
b) HEPA dust collection mandatory for equipment and/or tools
c) Wet methods required where practical
d) Restricted access to immediate work area
e) Waste containers will be placed within the work area

**PPE Requirements (additional PPE may be required)**

a) Half-Face respirators with Organic/Vapor cartridge
b) Gloves
c) Safety glasses
d) Tyvek suit with hood and elastic cuffs
e) Wipeable boots or boot covers

**Hygiene & Decontamination**

a) Dedicated cleanup using tested HEPA equipped vacuum and wet wiping only
b) Disposal of waste must be double bagged in 6 Mil. Polyethylene
c) Waste containers shall be cleaned using wet wiping prior to leaving work area
d) Contaminated outerwear shall be removed or cleaned prior to leaving work area
e) Hand and face washing before leaving work area
f) Respirator and reusable equipment shall be cleaned and inspected after use
g) Dust control verification and visual inspection by a competent person before area reopening for terminal cleaning

**Class 2b-3b: Completed by a 3rd Party Contractor**

## DOCUMENTATION AND /OR COMMUNICATION

- Lead Work Risk Assessment Tool shall be completed and retained by the Project Designate.
- Infection Control Risk Assessment (ICRA) shall be completed in consultation with IPAC, where required.
- The Project Designate shall coordinate communication of lead work activities to affected departments and stakeholders.

**DISCLAIMER**: This is a CONTROLLED document. The most current version is in electronic format on the BCHS intranet site. Any documents appearing in paper form are NOT controlled.

- Appropriate signage identifying the lead work classification and Project Designate contact information shall be posted at the work area.
- Inspection and monitoring activities shall be documented by a competent person and maintained by the Project Designate.

## EDUCATIONAL REQUIREMENTS

- All engineering and maintenance workers must complete Lead Work training with Bi-Annual Lead Awareness recertification.
- The policy and standard operating procedures shall be reviewed annually.

## REQUIRED SAFETY PRACTICES

- Documented Lead Work Training for Worker/Contractor
- Posted signage that includes lead work Class and contact person
- Current (within 2 years) Quantitative Respirator Fit test and Individually assigned Elastomeric respirators
- PPE by Lead work class: Protective clothing with elasticized cuffs and hood, boot covers or wipeable boots, safety glasses and gloves will be provided and required
- Hand and face washing facilities will be used by every worker when leaving the work area

## QUALITY MONITORING PROCESS

Any identified hazard, exposure, or non-compliance incident shall be reported to the Project Designate, direct supervisor, and Health and Safety Specialist for investigation and follow-up. Internal staff shall complete a Parklane incident report where applicable.

**DISCLAIMER**: This is a CONTROLLED document. The most current version is in electronic format on the BCHS intranet site. Any documents appearing in paper form are NOT controlled.

## REFERENCES:

American Conference of Governmental Industrial Hygienists. (2024). *2024 TLVs and BEIs: Threshold limit values for chemical substances and physical agents & biological exposure indices*. ACGIH.

CSA Group. (2022). *CSA Z317.13:22 Infection control during construction, renovation, and maintenance of health care facilities*. CSA Group.

Environmental Abatement Council of Canada. (2025). *Lead guideline for construction, renovation, maintenance or repair*. EACC.

Ministry of Labour, Immigration, Training and Skills Development. (2011). *Lead on construction projects guideline*. Government of Ontario.
Ontario Ministry of Labour

National Institute for Occupational Safety and Health. (2024). *Lead: Workplace safety and health topics*. Centers for Disease Control and Prevention.
NIOSH Lead Safety Topics

Occupational Health and Safety Act (OHSA) – OntarioOccupational Health and Safety Act, R.S.O. 1990, c. O.1. (2025). Government of Ontario.
Ontario OHSA Legislation

Pinchin Ltd.
Pinchin Ltd. (2026). *Lead Awareness and Lead Work* [Training presentation].

Public Health Ontario. (2015). *Best practices for environmental cleaning for prevention and control of infections in all health care settings*. Queen's Printer for Ontario.
Public Health Ontario

**DISCLAIMER**: This is a CONTROLLED document. The most current version is in electronic format on the BCHS intranet site. Any documents appearing in paper form are NOT controlled.

# APPENDICES

## APPENDIX A: LEAD WORK RISK CLASSIFICATION TABLE

| | Class 1 | Class 2 A | Class 2b and 3a 3b | |
|---|---|---|---|---|
| **Examples of Typical Activities by Class** | **Minor** wall penetrations<br>**limited** small holes drilled<br>Installing anchors/signage<br>**Minor** manual scraping of localized deteriorated paint<br>**Small** isolated maintenance activities<br>**Limited** hardware or fixture removal | **Multiple** holes drilled<br>**Removal** by sanding & scraping<br>**Removal** of LCM using handheld non-powered tools<br>**Removal** using power tools<br>**Repeated** wall or ceiling access activities | **Demolition, grinding** | |
| **Tools** | Non powered, Powered tools - HEPA attachment required | Non powered, Powered tools - HEPA attachment required | Any | |
| **Dust** | **Minimal** visible dust | **Moderate** Visible dust | Heavy | |
| **Work Area Consideration** | Non-patient / well ventilated<br>Localised surface area | Non-Patient, Adjacent to Patient areas.<br>Large surface area | Non-Patient, Adjacent to Patient areas, Exterior and Interior spaces | |
| **Duration** | <30 min | 30 min – 2 hrs | >2 hrs | |
| **Frequency** | Incidental/One time | Repeated or Prolonged | Continuous work | |
| **Lead Content** | 0.025-0.05 mg/m3 | 0.05-0.50 mg/m3 | **2b**>0.50-1.25 mg/m3 | **3a/b** >1.25-2.50, >2.50 mg/m3 |
| **Exposure Risk** | Low | Moderate | High | |
| **Control Measures** | **General Measures** | **General Measures with** Monitoring & Oversight<br>Engineering Controls<br>PPE Requirements (additional PPE may be required) | **Additional control measures**, engineering controls, PPE requirements, hygiene practices, containment requirements, monitoring | |

**DISCLAIMER**: This is a CONTROLLED document. The most current version is in electronic format on the BCHS intranet site. Any documents appearing in paper form are NOT controlled.

| | | | |
|---|---|---|---|
| | | Hygiene & Decontamination | activities, and work restrictions shall be determined through an enhanced risk assessment process |
| **Worker** | **Maintenance** | **Maintenance** | 3rd Party Contractor |

## APPENDIX B - LEAD WORK RISKS ASSESSMENT TOOL

| Section A: Project Scope | | |
|---|---|---|
| Location of construction / renovation: | Other areas/systems impacted i.e. adjacent area & HVAC system: | |
| Project Description: | Project Start Date: | Estimated Duration: |
| Project Manager: | Phone / Email: | |
| Maintenance Department: | Phone / Email: | |
| Department/Unit lead for impacted areas: | Phone / Email: | |
| Contractor(s): | Phone / Email: | |
| Health & Safety Lead: | Phone /Email: | |
| IPAC Lead: | Phone / Email: | |

| Section B: Project Details: |
|---|
| ☐ Patient Area ☐ Public Area ☐ Administration Area ☐ Mechanical |
| ☐ Drilling ☐ Cutting ☐ Paint Scraping ☐Sanding ☐ Demolition ☐ Other: _____ |
| Dust: ☐ Minimal ☐ Moderate ☐ Heavy Est. Duration of work: _____min/hr. |
| Description of Work: |

**DISCLAIMER**: This is a CONTROLLED document. The most current version is in electronic format on the BCHS intranet site. Any documents appearing in paper form are NOT controlled.

## Section C: Material Source Assessment and Sample Results

☐ Sample Needed ☐ Survey ☐ Lab Test ☐ Presumptive/ Suspected ☐ Lead Present ☐ No Lead

| Sample completed by: | Concentration: _____ %<br>Lead Containing <.05% Lead Based >0.1% |
|---|---|

## Section D: Construction Activity

**Select EACC class based on project description**

**Class 1:** Minimal disturbance of lead-containing material with:
- Very limited dust generation
- Short duration
- Small surface area disturbance
- No significant airborne lead expected

**Class 2:** Moderate disturbance of lead-containing material with:
- Repeated or prolonged work
- Moderate dust generation
- Increased potential for airborne lead

**Class 3:** significant disturbance or removal of lead-containing materials with:
- High dust generation
- Large surface area disturbance
- High airborne lead potential

## Section E: Population and Geographical Risk Group

**Select population and geographical risk group**

1. Group 1: Lowest Risk
2. Group 2: Medium Risk
3. Group 3: Medium / High Risk
4. Group 4: Highest Risk construction

***CSA Z317.13.22***

## Section F: Disturbance, Exposure and Worker Classification

| | Class 1 | Class 2A | Class 2B | Class 3 | EACC |
|---|---|---|---|---|---|
| **Group 1** | Internal Staff | Maintenance + Supervisor Review | Contractor Required | Contractor Required | Class 1-3 |
| **Group 2** | Internal Staff + Supervisor Review | Maintenance or Contractor | Contractor Required | Contractor Required | Class 2-3 |
| **Group 3** | Internal + OH/Supervisor Review | Contractor Preferred | Contractor Required | Contractor Required | Class 2-3 |
| **Group 4** | Contractor Preferred | Contractor Required | Contractor Required | Contractor Required | Class 1-3 |

## Section G: Additional Control Recommendations

## S Section H: Control Measure and Procedure Compliance

| Review Date | Control Measures Met | Issue Identified | Action Taken | Compliance Date | |
|---|---|---|---|---|---|

**DISCLAIMER**: This is a CONTROLLED document. The most current version is in electronic format on the BCHS intranet site. Any documents appearing in paper form are NOT controlled.

| | | | | | |
|---|---|---|---|---|---|
| | | | | | |
| | | | | | |
| | | | | | |

## APPENDIX C – LEAD WORK SIGNAGE

Example

**DISCLAIMER**: This is a CONTROLLED document. The most current version is in electronic format on the BCHS intranet site. Any documents appearing in paper form are NOT controlled.



# ATTENTION CONTRACTOR TEAM

Lead-containing (or other hazardous) materials may be present in the building materials in this area.

Please contact Maintenance and Redevelopment before drilling or disturbing any material that has not already been discussed.

Thank you for your cooperation in keeping our facility safe.

**Project Coordinator contact: Enza Cammalleri**
**C: 226-388-4408**

**Maintenance Admin contact: Meagan Olszowy**
**C: 519-751-5544, ext. 2432**

**DISCLAIMER**: This is a CONTROLLED document. The most current version is in electronic format on the BCHS intranet site. Any documents appearing in paper form are NOT controlled.