PROGRAM DIRECTIVE

Program	Directive	A-180
Issued	April 1	5, 1980
Revised	May	12, 2000

SUBJECT:	Arsenic Exposures in Battery Manufacturing and Reclaim Plants
AFFECTED CODE DIRECTIVES:	S/ New Inorganic Arsenic Rules, Division 2/Z, 1910.1018, OSHA P.D. CPL 2-2.22
PURPOSE:	To alert compliance officers to potential arsenic hazards in battery manufacturing plants.
BACKGROUND:	Employee exposure to lead in battery manufacturing and reclaiming plants is a well recognized and documented health hazard. The implementation of the arsenic standard necessitates evaluation of arsenic as a potential health hazard. Arsenic is present in the casting (grid) lead as an impurity (generally less than 1%). Even with this low composition, arsenic exposures can be anticipated at any operation in which heat is applied to the battery grid (i.e., grid casting, parts casting, group burning, assembly burning, finish burning, and secondary smelting).
ACTION:	Until further notice, health compliance officers should routinely sample and document arsenic exposures in battery manufacturing plants.
EFFECTIVE DATE:	This directive is effective immediately and will remain in effect until cancelled or superseded.