# Model Written Lead Compliance Program

# for Construction Work

his document contains information that requires font color attributes to be turned on in screen reader settings.

*This is a fillable template that the employer must complete. Instructions in red font enclosed in brackets indicate where you must enter your worksite-specific information.*

California Code of Regulations, Title 8 (T8 CCR), section 1532.1 (“Lead”) applies to all construction work where an employee may be occupationally exposed to lead. All construction work excluded from coverage by section 5198 (Lead standard for general industry) is covered by section 1532.1.

Cal/OSHA developed this model program to assist employers engaged in construction activities, as defined by section 1502(a), with creating their written lead compliance program. This includes activities where lead-containing materials are altered or disturbed, such as the following:

* Demolition or salvage of structures
* Removal or encapsulation of materials
* New construction, alteration, repair, or renovation of structures, substrates, or portions thereof.
* Installation of products
* Contamination/emergency cleanup
* Transportation, disposal, storage, or containment of materials on the site at which construction activities are performed
* Maintenance operations associated with the construction activities described in section 1532.1.

Employers are not required to use this model program, but if they do, the person with authority and responsibility for implementing the worksite written lead compliance program must do the following:

* Carefully review all the elements of section 1532.1.
* Ensure that this compliance program addresses the specific type of jobsite, and the lead hazards encountered. Depending on the circumstances, this may require separate compliance programs for each jobsite. Using it will not guarantee that it will meet regulatory requirements. However, it should save some development time.

Construction employers have the option of using this template or modifying it so that it effectively addresses the required elements, as outlined in this model and section 1532.1. Using this template is not required and employers may alternatively use a different lead compliance program template or develop their program from scratch.

## **Online Resources**:

* [**Cal/OSHA Publications**](https://www.dir.ca.gov/dosh/PubOrder.asp) www.dir.ca.gov/dosh/PubOrder.asp
	+ [**Lead in Construction – A Guide for Employers**](https://www.dir.ca.gov/dosh/PubOrder.asp#Lead)
* [**California Code of Regulations, Title 8, Table of Contents**](http://www.dir.ca.gov/Title8Index/t8index.asp), www.dir.ca.gov/Title8Index/t8index.asp
* [**T8 CCR, section 1532.1**](https://www.dir.ca.gov/Title8/1532_1.html)



December 2024

Copyright 2024 State of California, Department of Industrial Relations. Permission granted to display, perform, reproduce and distribute exclusively for nonprofit and educational purposes, and may not be used for any commercial purpose. All other rights reserved

## Lead Compliance Program for[Type name of company]

Date [Type latest revision date here]

Jobsite Location [Provide jobsite address, name, or location]

### [Name of company] establishes and implements this written compliance program prior to the commencement of any job involving lead-containing materials, with the goal of keeping employee exposures below the Permissible Exposure Level (PEL) for lead. Where the PEL cannot be achieved through engineering and work practice controls, employees will be required to wear respirator protection that complies with the requirements of section 1532.1(f).

Activities Where Lead is Emitted

### Attachment A provides details on each activity in which lead is emitted at the job site.

[Complete Attachment A as to each activity at the jobsite in which lead is emitted. Site-specific job safety analysis (JSA) and/or task hazard analysis (THA) may be used instead of the Attachment A table, provided that all the information in the Attachment A table is included. Describe how the THAs/JSAs will be incorporated as attachments to this program.]

### Exposure Controls

### Attachment B provides details on the specific activities and corresponding exposure controls.

[Complete Attachment B as to each activity at the jobsite in which lead is emitted. Provide detail when it comes to the activity “exposure control measures”. As with Attachment A, the site-specific job safety analysis (JSA) and/or task hazard analysis (THA) may be used instead of the Attachment B table, provided that all the information in the Attachment B table is included. Describe how the THAs/JSAs will be incorporated as attachments to this program.]

### Exposure Controls Determined to be Infeasible [Delete this section if it is not applicable]

### The following are the engineering and work practice controls that were considered in meeting the PEL for lead, but were not implemented due to infeasibility:

|  |  |  |
| --- | --- | --- |
| **Activity** | **Control** | **Explanation****(Why it is not feasible and how this determination was made)** |
|  |  | [Describe how the control was determined to be infeasible. Incorporate into this written program any documentation that was used in the determination.] |
|  |  |  |
|  |  |  |

### Air Monitoring Information

|  |  |
| --- | --- |
| Source of Lead Emissions | Air Monitoring Data |
| [e.g., power sanding with 80 grit sandpaper on lead coating of XYZ metal structure] | [Provide the corresponding air monitoring data that documents lead emission sources. Describe where the detailed information – including how the samples were collected and analyzed – is kept. Consider incorporating all this information into this program as an attachment.] |
|  |  |
|  |  |
|  |  |

### [Refer to section 1532.1(d) for details on what must be addressed. Describe how this air monitoring information will be made accessible according to T8 CCR sections 3204 and 1532.1 requirements.]

### Compliance Program Implementation Schedule

### [Name of Company] has developed the following schedule for implementation of our lead compliance program at this jobsite:

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| Lead Program Element | Effectively Implemented**Yes/No** | Set Implementation Completion Date | Person Responsible | Documentation |
|  | [If “yes”, date Implemented] |  |  | [Include any documentation, such as copies of purchase orders for equipment, construction contracts, etc.] |
|  |  |  |  |  |
|  |  |  |  |  |
|  |  |  |  |  |

### Work Practice Program

### Attachment C of this program provides details on how we implement the following work practices at this job site:

* Protective work clothing and equipment [Refer to section 1532.1(g) for details on what must be addressed]
* Housekeeping [Refer to section 1532.1(h) for details on what must be addressed]
* Hygiene facilities, practices, and regulated areas [Refer to section 1532.1(i) for details on what must be addressed]
* Section 1532.1 Appendix B work practices

### Administrative Control Schedule [Delete this section if not applicable]

### The table in Attachment D of this program outlines our schedule at this job site for implementing administrative controls (job rotation schedules) to reduce employees’ timeweighted average (TWA) lead exposures.

### Multi-Contractor Jobsites [Delete this section if not applicable]

### At this job site our employees, as well as employees working for other contractors, are potentially exposed to lead. The following are the measures that we will take to ensure our employees, and those of other contractors, are informed of the:

### Potential lead exposures

### Presence of regulated areas

### [Describe arrangements made among contractors to share information on multi-contractor jobsites.]

### Other Relevant Information [If applicable, provide any other information, beyond the details provided in the rest of this program, as to how the employer is ensuring that no employee is exposed to airborne concentrations of lead above the PEL at this jobsite]

### Inspections

The following are the names of the supervisors responsible for conducting inspections of the:

* Jobsite
* Regulated areas
* Materials
* Exposure control equipment

|  |  |  |
| --- | --- | --- |
| **Name of Supervisor and Job Title** | **Inspections Responsible For** | **Frequency of Inspections** |
|  | [e.g., jobsites, regulated areas, materials, equipment, or “all”.] | [e.g., hourly, daily, etc.] |
|  |  |  |
|  |  |  |
|  |  |  |
|  |  |  |

These individuals are responsible for ensuring that:

* Jobsites are proactively evaluated for the presence of materials containing lead, where those materials are, and if employees will be disturbing those materials.
* Establishing regulated areas that meet T8 CCR section 1532.1 requirements.
* The equipment needed to effectively control employee exposures is available and properly functioning.

### Compliance Program Review and Availability

The effectiveness of the written lead compliance program will be evaluated and updated at least every six months. The table in Attachment E will be used to document this process.

These records will be kept for at least three years by [Describe how and where this will be accomplished.]

The program will be made readily available for examination and copying upon request to each affected employee (or their designated representative) by [Describe how this will be accomplished.]

## Attachment A

Activities Where Lead is Emitted

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Activity\* | Equipment Used | Material Involved | CrewSize | Employee Job Responsibilities | Operating Procedures | Maintenance Practices | Other |
| [e.g., manual sanding] | [e.g., 80 grit sandpaper] | [e.g., paint on XYZ metal structure] | [e.g., 5] | [e.g., summarize the scope of the job to be done] | [e.g., spray water mist on surface before sanding. Ensure thorough wetting of surface. Describe how water will be readily replenished, as needed.] | [e.g., follow mfg. instructions to ensure proper function of the sprayer and adequate supply of water.] |  |
|  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |

### \* Includes Level 1, 2, 3 trigger tasks, or trigger task not listed, as defined by T8 CCR section 1532.1, regardless of whether an employee exposure assessment has been performed.

[Use the Attachment B table to provide details on the specific exposure control measures that are used for each corresponding activity.]

### Attachment B

## Exposure Controls

[For each activity, provide the corresponding engineering, work practice, administrative, and/or respiratory protection control measures used (as applicable). Detail the specific control measures that are applicable to this activity. Where engineering controls are required to control employee exposures, include as attachments the engineering plans and studies used to determine the methods selected]

### The following describes the specific worker exposure control measures used to achieve compliance with T8 CCR section 1532.1:

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| **Activity** | **Engineering**  | **Work Practices**  | **Administrative**  | **Respiratory Protection** |
| [e.g., power sanding with 80 grit sandpaper on lead coating of XYZ metal structure.] | [e.g., specify the type of tools to be used that are fitted with water controls, including the quantities of water that must be provided, and how it is to be applied to adequately control airborne exposures. Consider incorporating the manufacturer’s proper operating instructions as an attachment to this program.] | [If applicable, refer to the Attachment C work practice program.] | [If applicable, refer to Attachment D administrative control schedule] | [If applicable, specify the type (brand/model) of respirator workers must use, including the type of filter and/or cartridge. Respirators used must have assigned protection factors suitable for the levels of exposures workers encounter.]  |
|  |  |  |  |  |
|  |  |  |  |  |
|  |  |  |  |  |

## Attachment C

## Work Practice Program

### Protective Work Clothing and Equipment

|  |  |  |
| --- | --- | --- |
| **Work Practice** | **Exposure operation** | **Measures to be Taken** |
| [e.g., use of ABC disposable protective clothing] | [e.g., chemical stripping of lead coating on steel prior to welding] | [e.g., employees must don their ABC protective clothing prior to using XYZ chemical stripper, and must place the disposable coveralls in the carboard container before leaving the area] |
|  |  |  |
|  |  |  |
|  |  |  |

### Housekeeping

|  |  |  |
| --- | --- | --- |
| **Work Practice** | **Exposure operation** | **Measures to be Taken** |
| [e.g., water/soap spray application] | [e.g., cleaning up residual lead coating that has been stripped] | [e.g., the ABC light pressure water sprayer must be used with 10:1 mixture of water and DEF liquid dish soap. Sprayer is to be used to reduce dust generation when cleaning up residual stripped lead coating] |
|  |  |  |
|  |  |  |
|  |  |  |

### Hygiene Facilities and Practices

|  |  |  |
| --- | --- | --- |
| **Work Practice** | **Exposure operation** | **Measures to be Taken** |
| [e.g., hand washing] | [e.g., chemical stripping of lead coating and residual cleanup | [e.g., employees must wash their hands as soon as the exposure task is completed, or whenever they are required to leave the exposure area. ABC soap especially formulated for removing lead from skin is provided in all of the closest washing facilities. The lead for each job is responsible for ensuring that soap and disposable paper towels are always readily available for use] |
|  |  |  |
|  |  |  |
|  |  |  |

## Attachment D

## Administrative Controls – Worker Job Rotation Schedule

|  |  |  |
| --- | --- | --- |
| **Employee name and other unique identifier****[e.g., date of birth or employee identification number]** | **Duration and exposure levels at each job or workstation where the employee is located****[Provide the maximum amount of time workers can be exposed, and where they must rotate to reduce their exposures to below the PEL]** | Any other information that may be useful in assessing the reliability of administrative controls to reduce exposure to lead. |
| [e.g., John Doe, DOB 1/1/25] | [e.g., manual sanding for a maximum of 4 hours per shift with up to 200 µg/m3 8-hour average exposure. Balance of the shift must be spent in non-regulated areas.] |  |
|  |  |  |
|  |  |  |
|  |  |  |

## Attachment E

## Compliance Program Review

|  |  |  |
| --- | --- | --- |
| **Name(s) of the person(s) who reviewed the compliance program** | **Date the review was completed** | **Summary of revisions and updates to the compliance program** |
|  |  |  |
|  |  |  |
|  |  |  |
|  |  |  |