

EXAMPLES OF A CAL/OSHA REQUIRED “WRITTEN COMPLIANCE PROGRAM”

Office of Environment, Health & Safety

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This document is required by Cal/OSHA, Title 8 CCR 1532.1, and must be kept on-site during all lead abatement work and work that disturbs lead containing materials and be accompanied by the laboratory results of bulk lead samples.

PROJECT DESCRIPTION

The purpose of this project is to [fill in the whole reason for the job, demolition, paint preparation, plumbing repairs, etc. If it is in a day-car facility or one that may be frequented by children there are other requirements] The [type of material, paint, solder, etc.] contains lead. [A simple description of dust control. For instance, “The wall cuts will be sprayed with water to stabilize the paint dust.”] [A simple description of how the dust and small debris will be handled. For instance, “A HEPA vacuum will be used to vacuum up any dust and small construction debris.” or “The walls will be cut with a Saws-all equipped with a HEPA attachment.”]

EXPOSURE CONTROL METHODS

[Expand on the brief descriptions above especially how the worker’s exposure will be kept to a minimum.]

All surfaces undergoing lead containing material disturbance will be kept damp by using a sprayer that delivers a fine mist of water to the surface at approximately 1/4 to 1/2 gallon per minute.

If it appears to be necessary, ventilation will be provided to the room via a HEPA filtered air machine that will filter the air, or a large fan that will exhaust it to the exterior of the building.

All workers disturbing lead-based paint will wear disposable coveralls (such as Tyvek™), shoe coverings or washable boots, disposable gloves, eye protection and any other equipment that is necessary for the health and safety of the workers.

Respiratory protection will be provided through the use of HEPA filtered half-face negative pressure respirators. All respirators will be NIOSH/MSHA-approved. Disposable dust/mist respirators will not be used.

WORKER TRAINING

[OSHA says they must have been trained before their exposure if they may be exposed above the action level of 30 µg/m³. Regardless of what we think their exposure will be, we have to prove what their exposure is. That’s what the Initial Exposure Assessment and this Written Compliance Program is for.]

All workers disturbing lead-based paint will have documentation of training in lead hazards according to Cal/OSHA 8 CCR 1532.1 and the contents of this Lead Compliance Program. The training documentation will be kept in the office for the review of a regulatory agency or an EH&S representative.

OTHER AVAILABLE TECHNOLOGY

If personal lead exposures are found to be above the Cal-OSHA Permissible Exposure Limit (PEL), EH&S will assist in the use of vacuum assisted, pneumatic or electric tools in order to further control the generation of dust. If the PEL is reached, a containment facility is required and will be constructed. It will be configured appropriately for the specific space being renovated.

EH&S will assist in the collection of an initial exposure assessment of project worker's lead exposures and ongoing personal exposure monitoring. In consultation with EH&S, such data may be used to estimate worker exposures on similar projects.

BULK AND AIR MONITORING

The results of testing of bulk samples collected for this project is [**must be**] attached to this Compliance Program. Personal air samples will be collected by UC Berkeley EH&S, PP-CS or an independent third party consulting firm on a daily basis, or until the exposure has been shown to be below the Action Level. Air sampling results will be documented and available to affected workers. Documentation of exposure monitoring will be kept on file at EH&S.

PERIMETER AIR SAMPLING

UC Berkeley EH&S, PP-CS or an independent third party consulting firm may collect daily perimeter air samples during the disturbance of lead containing materials. The perimeter samples will be collected outside of the controlled area. Perimeter air sample results that exceed $1.5 \mu\text{g}/\text{m}^3$ will require an increase in engineering controls until the perimeter airborne lead levels are brought below $1.5 \mu\text{g}/\text{m}^3$.

IMPLEMENTATION SCHEDULE

This project will be begin at the time designated by someone yet to be determined and is planned to last no longer than [**approximately how many days of actual lead disturbance**] days. This Lead Compliance Program will be in effect from the beginning of the set-up through the disturbance and clearance of all activities that disturb the paint.

WORK PRACTICE PROGRAM

A controlled area will be established using barriers to prevent the spread of lead dust. Doors, openings, and adjacent spaces will be sealed off to prevent dust movement. The building ventilation system will be sealed off and isolated from the work area. If an employee's exposure has been shown or is assumed to be above the PEL, a sign will be posted at the entrance reading "WARNING. LEAD WORK AREA. POISON. NO SMOKING OR EATING." The sign shall be illuminated and cleaned as necessary so that the legend is readily visible. While working in the controlled area, all personnel will wear personal protective equipment as outlined above.

HOUSEKEEPING

Fire retardant 6 ml plastic sheeting will be taped to the floor, countertops and other surfaces to prevent water and debris from damaging existing surfaces and equipment.

Dust and debris that is produced will be cleaned up as the crew progresses. The clean up will be performed by using a wet/dry HEPA vacuum cleaner and a floor wand to pick up the wet debris and avoid the buildup of standing water. Ground fault circuit interrupter (GFCI) protection will be used on all portable electric equipment.

Disposable personal protective equipment will be segregated from the dust, debris and water collected during the disturbance of the lead containing materials. The waste products produced and collected will be placed in appropriate containers provided by EH&S Hazardous Waste Management.

HYGIENE FACILITIES

Eating or drinking will not be allowed in the controlled area where lead containing materials are being or have been disturbed.

Protective clothing will be put on outside of the controlled area and removed before leaving the controlled area.

Prior to leaving the controlled area each workers will wash their face and hands using a portable wash station [**like a bucket of clean water with soap and towels**] or an available sink after removing the protective clothing and equipment. Workers are encouraged to shower immediately after each day's work.

JOB SITE INSPECTIONS

The project supervisor and UC Berkeley EH&S, PP-CS or an independent third party consulting firm will periodically inspect the site to determine the quality of the controlled area and the worker's procedures. Any concerns will be immediately addressed through line management.

WASTE DISPOSAL

EH&S will supply Department of Transportation (DOT) approved containers with the appropriate hazardous waste and DOT shipping labels. Personnel collecting the waste will be responsible for filling in the accumulation start date when the first item is placed into the hazardous waste container.

While on-site, hazardous waste container will kept closed except when adding or removing waste. The containers will be placed in a secure location. Aisle space will be maintained to allow unobstructed movement of personnel and equipment. A warning sign (“Hazardous Waste Area—Authorized Personnel Only”) will be installed [**it may be hand written**] near the waste container.

CLEARANCE SAMPLING

Upon completion of the lead disturbing activities, UC Berkeley EH&S, PP-CS or an independent third party consulting firm **may** collect clearance samples using criteria established in the current U.S. Department of Housing and Urban Development (HUD) Guidelines. If clearance to these levels cannot be achieved, clearance will be granted once surface wipe lead levels are reduced to below pre-abatement or surrounding area levels. Clearance sampling results will have to be approved by EH&S prior to removing the barriers or demobilizing the project

It **may** be appropriate to provide clearance through a visual assessment. This will be determined by UC Berkeley EH&S, PP-CS or an independent third party consulting firm.