Model OSHA Written Compliance Plan for LBP-Related Work

A. Purpose: This plan has been developed to comply with the OSHA Construction Lead Standard (29 CFR 1926.62), the OSHA Personal Protective Equipment Standard (29 CFR 1926 Subpart E) and to ensure the health and safety of employees and building occupants during the work with lead-based paint (LBP) and LBP hazards described.

B. Location:

Address: _____________________________________________________________

Owner: ___________________________________________________________________________

A lead inspection/assessment of this location was conducted by (name and address)

_____________________________________________________________________________________

and on the basis of this, LBP or LBP hazards were found (or assumed to be present) on the following building components:

_____________________________________________________________________________________

All work performed on or around these components will be carried out in accordance with standard lead hazard reduction procedures to protect employees and building occupants.

C. Work to Be Performed:

The following hazard reduction measures will be undertaken (complete applicable lines with the names of the particular components/areas to be addressed):

- Component replacement
- Encapsulation
- Enclosure
- Paint film stabilization
- Friction surface treatment
- Impact surface treatment
- Dust removal
- Soil covering
- Soil removal

This work is _____ is not _____ abatement as defined in 40 CFR 745

Based on our previous experience, available monitoring data, and the OSHA task classes, the anticipated exposure level (in µg/m$^3$) is expected to be in the range:

- _____ below 50
- _____ 50-199
- _____ 200-499
- _____ 500-2599
- _____ above 2500

based on _____ tasks to be performed _____ previous sampling of similar jobs

Basis for Task Class designation:

Reference monitoring information used for this exposure assessment:

Date ___________ Task ___________ Exposure (µg/m$^3$) ___________
I affirm that the reference task would produce a level at least as high as the current task and that the workers performing the current task are similar in training and experience to those performing the reference task.

This work will ___ will not ___ exceed the HUD de minimis levels:
- > 2 sq ft in any one interior space or room
- > 20 sq ft on any exterior surface
- > 10% of the area of any small component

This work will ___ will not ___ exceed the EPA RRP de minimis levels:
- > 6 sq ft in any one interior space or room
- > 20 sq ft on any exterior surface
work involves window replacement, demolition, or abatement

**D. Work Schedule**

<table>
<thead>
<tr>
<th>Expected Start Date</th>
<th>Expected Completion Date</th>
<th>Abatement Notification sent</th>
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</table>

1. **Initial Activities.** Work on LBP/LBP hazards -- other than HEPA vacuuming or wet washing to enable safe entry-- will not begin until the initial setup of the area is completed, including the essential control measures for the task. For this job the checked items will be included:
   - _____ provide EPA lead information pamphlet (and get signatures) to owner and occupants
   - _____ cleanup (HEPA/wet wash) of existing dust and debris
   - _____ relocate occupants per HUD requirements
   - _____ relocate or protect with poly sheeting the occupants’ belongings
   - _____ post warning signs
   - _____ lock/out tag out (when necessary)
   - _____ barrier tape to restrict area
   - put polyethylene sheeting as dust barrier
     - on doors
     - on floors inside work area (2 layers, 6 mil for abatement)
     - on floors outside work area
     - on windows
     - on ground
     - on HVAC air supply and return
     - as tunnel around entrance
   - _____ create safe passage when necessary
   - _____ provide respirators
   - _____ provide disposable clothing
   - _____ provide other PPE (list)
   - _____ additional (list)

2. **Regular Tasks.** All work done on this job will be performed using the control measures described in the HUD guidelines and OSHA construction standard. In particular,
   a. Required work practices:
      - _____ wet methods during lead safe work practices
      - _____ local exhaust when using power tools
      - _____ daily cleanup (wet methods/HEPA vac) of work area
      - _____ daily cleanup (wet methods/HEPA vac) of entry area
      - _____ handwashing before breaks and end of shift
      - _____ removal of disposable booties before leaving protected area
      - _____ create safe passage
      - _____ daily cleanup exterior paint chips/debris
      - _____ daily cleanup exterior liquid waste
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___ secure waste and debris daily waste

b. Forbidden work practices: The following activities will not be allowed during the job
   • open-flame burning or torching
   • heat gun removal above 1100°F
   • machine sanding/grinding without a HEPA dust collection system
   • abrasive blasting without a HEPA dust collection system
   • use of volatile stripper that is an OSHA hazardous chemical unless there is adequate ventilation provided
   • dry sanding or dry scraping; however, this may be performed if necessary
     ___ below the HUD de minimis level
     ___ within 1 foot of an electrical outlet or switch
     ___ during allowed heat gun removal of paint

c. Brief description of additional control measures (if any) to be used during this activity to reduce worker and occupant exposure

3. Cleanup
   ____ remove visible paint chips (interior and exterior)
   ____ HEPA vac
   ____ wet clean (required for all stripped surfaces)
   ____ clean surfaces stripped with caustic chemicals by wet washing

4. Clearance. Except for work performed below the HUD de minimis levels, the work area will not be returned to the owner's control until after the area meets the HUD clearance requirements. For interior work, an independent clearance examiner must perform a visual assessment and collect clearance dust wipe samples. For exterior work, soil sampling may be required if there are paint chips visible in the work area following cleanup.
   ____ Clearance is not required on this job because it falls below the de minimis levels.
   ____ Clearance will be performed on this job by ____________________________
   ____ Clearance results attached; (including signature of clearance technician, and lab information)

5. Suggested monitoring schedule of enclosure _____, encapsulation ____, or interim controls ____.

E. Equipment and Materials. Work will not begin on the job until all necessary equipment and supplies have been brought to the site and placed where they can be accessed without spreading lead contamination from the work area.
Examples of the equipment and materials routinely used for safe and effective work are HEPA vacuums, detergents for general cleaning and handwashing, pump sprayers, shop rags, disposable clothing, cotton work gloves, butyl rubber gloves, respirators, plastic sheeting, stapler and staples, masking tape, duct tape, warning signs, double buckets, paint rollers and brushes.
Special equipment and materials to be used on this project are (list):

F. Employees Performing the Work. (See the attached list.)

G. Personnel Protection

1. All respirator use is governed by our written respiratory program (on file). For voluntary use, respirators, NIOSH-approved half-mask negative pressure air purifying respirators equipped with N100 or P100 (HEPA) filters are provided. For mandatory use, the appropriate respirator is selected according to the table in 29 CFR 1926.62; a powered air-purifying respirator is provided in lieu of any NPAPR for any worker requiring a respirator and requesting a PAPR.

Respirator use on this job is ___ mandatory ___ voluntary.

The type of respirator required by the initial exposure assessment is

___ filtering facepiece ___ NPAPR, ½ mask ___ NPAPR, full-face
___ PAPR, ½ mask ___ PAPR, full-face ___ PAPR, hood style
___ SAR, CF ___ SAR, PD/PP ___ SCBA

___ No respirators used at any time during the project

Respirators are not required during the site preparation phase, nor for final cleanup for clearance. Tasks requiring respirators during this project are:

2. Disposable Clothing. When needed, disposable clothing will be provided and will be discarded at the end of each work day. Because of the possibility of spreading contamination, the following type(s) of disposable clothing will be worn at the job site:

___ none ___ booties ___ full suits ___ other (list)

3. Other PPE. I certify that I have inspected the worksite for hazards of the following type and that I am requiring PPE as noted to protect workers from these hazards.

a. hazards to the head present: ___ None or ___ (list)

   PPE selected and required:

b. hazards to the face or eyes present: ___ None or ___ (list)

   PPE selected and required:

c. hazards to the hand present: ___ None or ___ (list)

   PPE selected and required:

d. hazards to the foot present: ___ None or ___ (list)

   PPE selected and required:

e. noise hazards present ___ None or ______ (specify level)

   PPE selected and required:
H. **Hygiene Facilities.** Handwashing facilities (soap, clean water, clean paper towels) will be provided to workers at the exit from each worksite at which LBP-related work takes place.

In addition, showers will be provided at work sites at which gross contamination of an employee's body is likely to occur. In particular, it will be provided at all sites where the PEL is likely to be exceeded. A shower ___will ___will not be used on this job.

I. **Waste disposal procedures**

J. **Technology Considered in Designing Control Measures to Meet the Permissible Exposure Limits.** The primary source of methodology was the training and materials provided by the Environmental Management Institute. This includes the HUD, EPA, CDC Lead Paint Safety, Field Guide for Painting, Home Maintenance, and Renovation Work and appropriate sections of the HUD Guidelines for Evaluation and Control of Lead Hazards in Housing, latest edition.

K. **Responsible Parties.**

Competent Person (name) ___________________________ Date _________________

Competent Person (signature) ___________________________________________

Designed by, if applicable (name) _______________________________________

Licensed supervisor on site (name) _______________________________________  

Contractor information:

Name of firm ___________________________________________________________

Address ______________________________________________________________ 

Supervisor ____________________________________________________________

Note: This plan is an expansion and update of the form in Chapter 9 of the 1995 HUD Guidelines.
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#### Employees Who May Work on the Project Described

<table>
<thead>
<tr>
<th>Name</th>
<th>Training Most Recent Level</th>
<th>Training Most Recent Date</th>
<th>Blood Testing Most Recent µg/dL</th>
<th>Full Medical Surveillance Date</th>
<th>Respirator Fit-Test Date</th>
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**Training Levels:**  
- **In** - Initial; **Rf** = Refresher  
- **LS** Licensed Supervisor  
- **4-Day** Equivalent to EPA Supervisor; no license  
- **W** Licensed Worker  
- **3-Day** Equivalent to EPA Worker; no license

**Blood Monitoring and Full Medical Surveillance:**  
NA means Not Applicable (This worker has not worked above the action level during the past 12 months.)

*Unless otherwise specified, all training was presented by the Environmental Management Institute, 5610 Crawfordsville Rd Ste 15, Indianapolis, IN 46224-3714*