
Model OSHA Written Compliance Plan

Date: ___/___/___

This plan has been developed to comply with the OSHA Construction Lead Standard, 29 CFR 1926.62.

1. Location of Project:

This job will take place at the residence located at _____(full address).

A previous lead inspection of this residence by _____(name and address of inspection or risk assessment firm) revealed that lead hazards or lead-based paint are present in the following locations:

These building components are coated with lead-based paint and represent a hazard to workers who may disturb it during lead hazard control, renovation, or maintenance activities.

2. Brief Description of Job:

This job will involve the following lead hazard reduction measures:

Replacement of _____

Enclosure of _____

Paint removal of _____

Encapsulation of _____

Paint film stabilization _____

Friction surface treatments of _____

Impact surfaces treatments of _____

Dust removal in the following areas _____

3. Schedule

The job is expected to start on _____ and end on _____. This compliance plan will take effect immediately on _____. The competent person will conduct worksite visual inspections on a daily basis.

Work will proceed according to the following schedule:

Day 1: Initial setup, followed by:

(Name all tasks to be completed)

Daily clean-up: wet mopping, HEPA vacuuming

Day 2: Tasks

Day 3: Tasks

Day 4: Final cleanup and clearance examination

4. Equipment and Materials

List the equipment

5. Crew:

The work will be completed by a crew of _____ workers.

Crew 1

Crew 2

6. Competent Person

_____, a licensed lead abatement contractor, will be onsite at all times and will act as the competent person of occupational health and safety issues. The lead abatement contractor number is _____. The lead contractor will conduct daily inspections of the work areas to ensure that control measures, work practices, personal protective equipment, and hygiene facilities are used as prescribed in this document.

7. Control Measures:

The primary control methods for the project are:

method substitution (building component replacement, enclosure)

wet methods

wrapping materials to be discarded in plastic

respiratory protection

local exhaust ventilation (needle guns, vacuum blasting)

general room ventilation

on-the-job training

HEPA vacuums

containment (use of plastic barriers)

8. Technology Considered in Meeting the Permissible Exposure Limit:

9. Respirators

All individuals in the work area will be provided with NIOSH/MSHA-approved half-mask, air-purifying respirator equipped with HEPA cartridges or a powered air-purifying respirator (if so requested).

Respirators will be provided in the context of a complete respiratory protection program; the written respirator program is attached.

Respirators will be required during (name phases of job for which respirators will be required);

Respirator use during other activities, including initial setup (laying down plastic for containment), and enclosure and encapsulation after surface preparation is not necessary, unless other workers nearby (same interior room or outside wall) are performing activities for which respirators are required.

10. Protective Clothing

Disposable protective clothing will be worn at all times inside the work area. Protective clothing will be made of breathable fabric to reduce the potential for worker heat stress. If visibly contaminated with dust or paint chips, protective clothing will be vacuumed before it is removed.

11. Hygiene Facilities

Handwashing facilities will be used to decontaminate workers, since leaded dust levels are expected to be low. Showers are used on jobs that generate high leaded dust levels. The facilities will be located in a portable trailer, which will be parked in the driveway of the residence. The trailer will contain two sinks, a fresh water tank, hot water heater, wastewater collection, tank, and easily cleanable floors and benches. Labeled plastic bins with cover will be used to separate disposable protective clothing from street clothing. Hot water, soap, and towels will be provided. Hands and face will be washed before all breaks and at the end of the day. Wastewater will be collected, pretreated onsite with filtration, and disposed of in accordance with prior arrangements made with _____ (name of local water and sewage authority).

12. Air Monitoring Data:

Previous data for lead hazard control projects conducted with similar controls, environmental conditions, personnel, and methods were reviewed. Air sampling will not be performed on this job, since typical exposures have already been established for these work crews by: _____ (name tasks during which substantial exposures are likely to occur).

In previous work conducted by the same contractor and work crew on similar houses in the same city, using the same methods, maximum personal exposures measured for various activities were:

Maximum Exposure	Task

The environmental conditions in the homes previously abated closely resemble the current location. These maximum exposures are expected to represent "worst-case" exposures because they did not include breaks or setup time; it is expected that 8-hour, tim-weighted average exposures on this job will be lower than these figures. However, worker respiratory protection requirements will be based on the maximum exposures to allow for unexpected variations.

13. Medical Surveillance Program:

A medical surveillance program is already in place for this work crew. It is supervised by:

Dr. _____ (name, address, and phone number of physician and/or firm.)

Worker blood lead levels are measured initially before the onset of work, each month for the first 6 months of employment, and every 6 months thereafter.

Blood lead levels for current employees who will be assigned to this job are between:

_____ micrograms/dl to _____ micrograms/dl (list range of blood lead levels) based on the report dated _____ (add date for latest medical monitoring report). Worker blood lead increases or 10 micrograms/dl or greater or any blood lead level greater than 25 micrograms/dl will trigger an investigation of protective equipment and work practices. All workers on this project are informed of their blood lead levels as soon as they are received.

14. Training

The following workers have been trained using the EPA Worker Training Curriculum and SOEH's *Guide For Protective Work Practices and Effective Worker Training*. The training was conducted by _____ (name, address, and phone number of training provider) on _____ (insert date).

Trainees	Social Security Number

Plan complete by:

_____ (name and signature)

_____ (date)