4th Quarter Safety Updates

Lead Regulations: Project Compliance

Job Hazard Analyses

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Lead Regulations & Project Compliance



- Regulatory Change Recap
- Project-level Observations
- Department Adaptation



October 2026

T8 CSO §1532.1 – Why update?

- Regulations in place prior to January 2025 were over 40 yrs old
- Tailored towards acute exposures
- Based on obsolete/incomplete epidemiological data from the ‘80s

Title 8. Industrial Relations
Division 1. Department of Industrial Relations
Chapter 4. Division of Industrial Safety
Subchapter 4. Construction Safety Orders
Article 4. Dusts, Fumes, Mists, Vapors, and Gases (Refs & Annos)

Return to index
New query

§1532.1. Lead.

2025 Lead Regulatory Changes

Reduc

- **93%** /m³
- **80%** *l*, down to 10 µg/m³
- **93%** nce trigger point

Introd

- **Leve** gun use
- **Leve** ools w/ dust collection
- **Leve** t collection, abrasive
  t cleanup & movement

Medic ion

- Redu
- Reco nt + 30 years

California Department of Industrial Relations
Division of Occupational Safety & Health
Publications Unit
SAFETY & HEALTH | EXECUTIVE SUMMARY

CAL OSHA

Construction Lead Standard
What Employers Need to Know

May 2025

Changes to the construction lead standard, Title 8 California Code of Regulations (T8CCR), go into effect on January 1, 2025. A flowchart of the main requirements and changes is included at the end of this summary. See section 1532.1 for specific requirements.

Important revisions to the construction lead standard include:

- A lower permissible exposure level (PEL) of 10 micrograms per cubic meter of air (ug/m3) and action level (AL) of 2 ug/m3.
- The designation of Level 1, 2, and 3 trigger tasks, along with trigger tasks not listed.
  - Many of the trigger tasks require a higher level of interim protections due to the lower PEL.
  - Additional interim worker exposure control measures for trigger tasks:
    - Eating facilities or areas.
    - Regulated areas.
    - Shower facilities for level 3 trigger tasks.
    - Dry abrasive blasting limited to 5 hours per day—2 hours per day beginning 1/1/30. These time limits do not apply once the employer has done the required exposure assessment and can ensure employee exposures are below the PEL with the appropriate respiratory protection.
- Follow-up employee airborne lead exposure monitoring:
  - Repeat worker exposure monitoring every 12 months when their exposures are determined to be above the AL, but below 30 ug/m3.
- The requirement for a written lead compliance program:
  - Report of any engineering and work practice controls not implemented because of infeasibility, and how each was determined to be infeasible.
  - Written documentation of revisions and updates.
- Personal protective equipment, clothing, and respirator requirements:
  - Provision of protective clothing at least daily where exposures exceed 30 ug/m3.
- Hygiene facilities, practices, and regulated areas:
  - Employees exposed to any amount of lead must wash their hands, exposed arms and face before eating, drinking, entering eating areas, smoking, applying cosmetics and at the end of their shift.



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Project-level Impacts

- **Increased compliance plan complexity**
  - Longer review times
  - More iterations, more reviewers
- **More comprehensive engineering controls**
  - Better containment systems
  - More HEPA-filtered equipment & tasks
  - Compartmentalized work zones
- **Expanded hygiene facilities and protocols**
  - Interim and project-duration installations
  - More detailed utilization plans
  - Increased PPE utilization by all staff

Structure Construction Approach

- **Engage the experts**
  - Contracts require plan preparation by CIH
  - Coordination with Department Environmental teams
- **Independent SC compliance plans**
  - Adopt CIH recommendations from authorized plan
  - SC oversight of SC staff
- **QA Role**
  - Verify conformance with authorized plan
  - Participate in plan evolution as work progresses

Lead Exposure Prevention: Dept Forecast

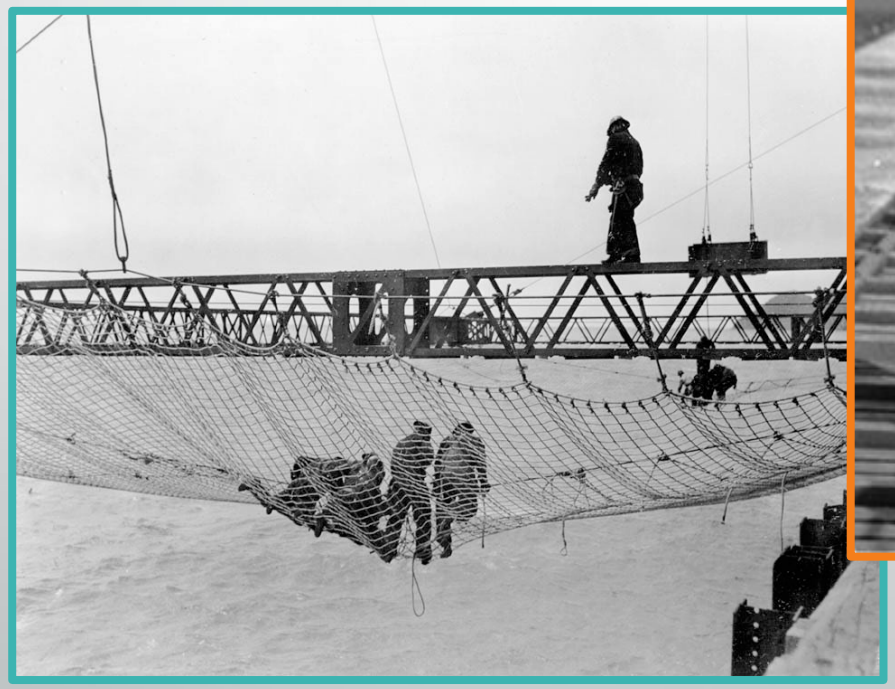
- Increased efficiency in plan development, review, and implementation
- Expanded industry knowledge & experience
- Standardized medical surveillance across larger number of trades and positions
- Innovation across Engineering, Work Practice, and Personal Protection Controls

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Job Hazard Analyses: What & Why

- Regulatory Requirements
- Contractual Requirement
- Department Approach
- Intent & Utilization





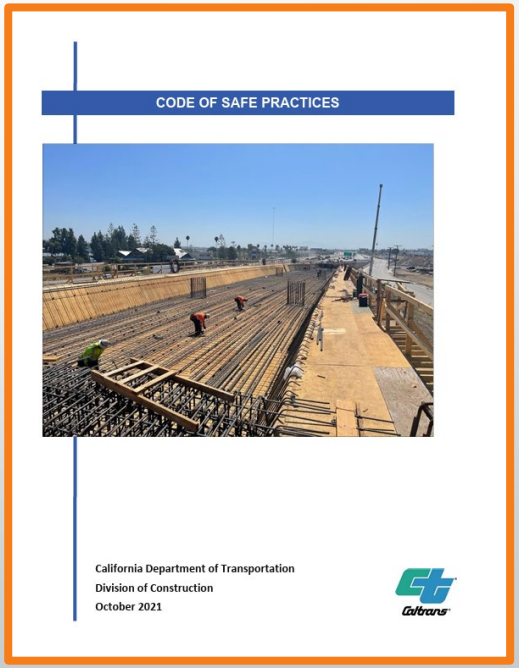
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JHAs: Regulatory Basis

T8 CSO §1509, *Injury & Illness Prevention Program*

- Must implement an IIPP satisfying §3203
- Employer must develop, post, and adopt a Code of Safe Practices





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JHAs: Regulatory Basis

T8 CSO § 1511, *General Safety Precautions*

§1511. General Safety Precautions.

(a) No worker shall be required or knowingly permitted to work in an unsafe place, unless for the purpose of making it safe and then only after proper precautions have been taken to protect the employee while doing such work.

(b) Prior to the presence of its employees, the employer shall make a thorough survey of the conditions of the site to determine, so far as practicable, the predictable hazards to employees and the kind and extent of safeguards necessary to prosecute the work in a safe manner in accordance with the relevant parts of Plate A-2-a and b of the Appendix.

Note: Authority cited: Section 142.3, Labor Code. Reference: Section 142.3, Labor Code.

- No employee shall be permitted to work in an unsafe space
- Prior to work, employer must perform a thorough survey of the site to determine and mitigate predictable hazards

JHAs: Regulatory Basis

T8 CSO §3203, *Injury & Illness Prevention Program*

§3203. Injury and Illness Prevention Program.

(a) Effective July 1, 1991, every employer shall establish, implement and maintain an effective Injury and Illness Prevention Program (Program). The Program shall be in writing and, shall, at a minimum:

(1) Identify the person or persons with authority and responsibility for implementing the Program.

(2) Include a system for ensuring that employees comply with safe and healthy work practices. Substantial compliance with this provision includes recognition of employees who follow safe and healthful work practices, training and retraining programs, disciplinary actions, or any other such means that ensures employee compliance with safe and healthful work practices.

(3) Include a system for communicating with employees in a form readily understandable by all affected employees on matters relating to occupational safety and health, including provisions designed to encourage employees to inform the employer of hazards at the worksite without fear of reprisal. Substantial compliance with this provision includes meetings, training programs, posting, written communications, a system of anonymous notification by employees about hazards, labor/management safety and health committees, or any other means that ensures communication with employees.

Exception: Employers having fewer than 10 employees shall be permitted to communicate to and instruct employees orally in general safe work practices with specific instructions with respect to hazards unique to the employees' job assignments as compliance with subsection (a)(3).

(4) Include procedures for identifying and evaluating work place hazards including scheduled periodic inspections to identify unsafe conditions and work practices. Inspections shall be made to identify and evaluate hazards:

- IIPP must include …. “procedures for identifying and evaluating workplace hazards including periodic inspections to identify unsafe conditions…”

JHAs: Contractual Basis

5-1.29 JOB HAZARD ANALYSES

Prepare a job hazard analysis for each work activity to be performed on the job site as required by CA Code of Regs § 3203(a)(4) and 1511(b).

Submit each job hazard analysis as an informational submittal.

Each job hazard analysis must identify the following:

2025 Std Spec Sec 50-1.29, Job Hazard Analyses

- Prepare and submit a JHA for each planned work activity to be performed on the site
  - Describe the activity
  - Describe the predictable hazards
  - Describe the planned control measures

JHAs: Structure Construction Approach

- **Department-wide IIPP**
  - Chapter 01 of Employee Safety Manual
  - Outlines mechanisms used to maintain compliance
  - Identifies supplemental resources
- **Project-specific COSPs**
  - Tailored to specific site and scope
  - Highlight risks/operations unique to contract
- **As-needed Supplemental JHAs**
  - Select adoption of Contractor JHAs
  - Independent JHAs per Engineer's judgement

JHAs: Intent & Utilization

- **Capitalize on collective experience**
- **Maintain proactive approach**
- **Equip our staff for effective QA presence**
- **Free up resources for inevitable “unknowns”**

Thank You

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