



SC Lead Compliance Plan

Revision and Approval

Revision	Date	Nature of Changes	Approved By
0	01-12-2023	Original Issue	Richard Foley

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Background

This process establishes Structure Construction (SC) roles, responsibilities, and procedures for administering the [Department's Injury and Illness Prevention Program \(IIPP\)](#) and SC's Lead Compliance Plan for SC staff who have potential exposure to lead during their duties.

Caltrans policies and guidance for lead safety are in:

1. *Contract Specifications, Section 7-1.02K(6)(j), Legal Relations and Responsibility to the Public – Laws – Labor Code – Occupational Safety and Health Standards – Lead Safety*
2. *Construction Manual, Chapter 7, Environmental Stewardship, [Section 7-107F](#), Disturbance of Existing Paint Systems on Bridge*
3. [Caltrans Employee Safety Manual](#), Chapter 15, *Respiratory Protection Program*.

Prior to reviewing this Bridge Construction Memo (BCM), it is essential to review any policy and guidance documents referenced above. The information in these documents typically will not be repeated in the text of this BCM.

Process Inputs

1. Contract work that may expose the employee to lead
2. Lead compliance plan (LCP) submittal from the Contractor

Procedure

1. All work associated with this process is charged as [Project Direct – Construction](#) for ongoing employee exposure and [Overhead](#) for employee training.
2. SC staff:
 - a. Review contract documents for potential lead exposure.
 - b. Review, understand, and conform to the following:
 - i. The Department’s IIPP, which is Chapter 1 of the [Caltrans Employee Safety Manual](#)
 - ii. [Attachment 1](#), *Structure Construction Lead Compliance Plan*
 - iii. [Attachment 2](#), *Structure Construction - Lead Compliance Program Matrix*
 - iv. Project specific or the Division of Construction’s [Code of Safe Practices](#)
 - v. References provided in the Background section above.
 - c. Attend lead compliance training at intervals required per the SC LCP.
 - d. Use and maintain the appropriate lead exposure personal protective equipment (PPE) per the SC LCP.
3. SC supervisors:
 - a. Verify SC staff follow the Department’s IIPP and SC LCP.
 - i. Conduct reviews of employees with lead exposure at specified intervals, to evaluate their compliance with the SC LCP.
 - b. Monitor SC staff per the SC LCP.
 - c. Ensure resources and training for lead compliance are available to SC staff.
 - d. Document training history, medical evaluation, and [Form SC-0602](#), *SC Medical Testing Authorization Form*.
 - e. Monitor the medical surveillance program as specified in the SC LCP.
4. SC managers:
 - a. Ensure SC supervisors have proper resourcing for essentials, including training and PPEs for SC staff.
 - b. Verify SC staff follow the Department’s IIPP and SC LCP.
 - i. Confirm that SC supervisors are performing reviews at specified intervals and forward the reviews to the SC Safety Liaison.
 - c. Verify medical surveillance program is implemented as specified in the SC LCP.

5. SC Safety Liaison (found in [SC HQ Contacts](#)):
 - a. Provide oversight of the SC LCP.
 - b. Coordinate industrial hygiene monitoring for work involving lead, to evaluate employee exposures per the SC LCP.
 - c. Archive all files related to the medical surveillance program per the SC LCP.
 - d. Initiate [Attachment 3](#), *Structure Construction Lead Compliance Memorandum* per the SC LCP. Send copies to SC staff, SC supervisor, SC manager, and Office of Safety and Health.

Process Outputs

1. SC staff training documentation
2. Form SC-0602, *SC Medical Testing Authorization Form*
3. *Structure Construction Lead Compliance Memorandum*
4. Medical Surveillance Program

Attachments

1. [Attachment 1](#), *Structure Construction Lead Compliance Plan*
2. [Attachment 2](#), *Structure Construction - Lead Compliance Program Matrix*
3. [Attachment 3](#), *Structure Construction Lead Compliance Memorandum*