JOB HAZARD ANALYSIS (JHA)

Business name

Document: JHA-001 Rev 1
Prepared: Nov 9, 2026
Review by: Dec 9, 2026
Highest risk after controls: Medium

1. BUSINESS AND JOB DETAILS

Job	Lead paint removal	**Start date**	Nov 9, 2026
Working hours	7:00 am to 3:30 pm	**Trade**	Painting

2. JOB STEPS, HAZARDS AND CONTROLS

#	Job step	Hazards	Risk before	Controls	Risk after	Responsible
1	Test the paint (EPA-recognized test kit or certified inspector) or presume it has lead, and give the occupants the EPA Renovate Right pamphlet before work starts (40 CFR 745.84). Where the RRP rule applies, a Lead-Safe Certified firm with a certified renovator does the work. Keep children and pregnant people away	Lead paint dust and fumes Working in an occupied home or building Rules: 40 CFR Part 745 (RRP rule) and 29 CFR 1926.62	**High** **Possible / Serious injury**	1.1 Test old paint for lead before you sand, scrape, cut or heat it. [Elimination] 1.2 Use wet scraping, chemical strippers or shrouded tools with extraction instead of dry sanding. Never burn off lead paint with an open flame. [Substitution] 1.3 Seal off the work area with plastic sheeting and keep residents, children and pets out. [Engineering (guarding)] 1.4 Clean up with a HEPA vacuum and wet wipes. Never dry sweep. [Engineering] 1.5 In homes and child-occupied facilities built before 1978 (such as child care centers, preschools and kindergarten classrooms), work that disturbs more than 6 sq ft inside or 20 sq ft outside is done by an EPA Lead-Safe Certified firm with a certified renovator (RRP rule). [Administrative] 1.6 Do an initial lead exposure assessment and protect workers as if over the limit until results are in. Over 50 micrograms per cubic meter, follow a written lead compliance program (29 CFR 1926.62(d), (e)). [Administrative] 1.7 Never torch painted surfaces, keep heat guns below 1,100 degrees F, and use sanders, grinders or planers only with a shroud and HEPA vacuum attachment (40 CFR 745.85(a)(3)). [Administrative] 1.8 Provide a clean change area and handwashing, and keep food, drink and tobacco out of the work area (29 CFR 1926.62(i)). [Administrative] 1.9 Wash hands and face before eating, drinking or smoking. Change out of dusty clothes before going home. [Administrative] 1.10 Wear a NIOSH-approved respirator with N100 or P100 filters, disposable coveralls and gloves. [PPE] 1.11 Plan noisy, dusty or risky work for when the building is empty. [Elimination] 1.12 Close off the work area with barriers, plastic sheeting or locked doors, and put up signs. [Engineering (guarding)] 1.13 Keep fire exits and paths clear at all times.	**Low** **Rare / Serious injury**	Site supervisor

#	Job step	Hazards	Risk before	Controls	Risk after	Responsible
				[Administrative] 1.14 Tell occupants before you turn off power, water or gas, and before noisy or dusty work. [Administrative] 1.15 Lock away tools, chemicals and materials each day, out of reach of children. [Administrative] 1.16 Clean up dust and debris at the end of each day. [Administrative]		
2	Turn off heating and cooling and close windows and vents in the work area	Lead paint dust and fumes General dust Rules: 40 CFR Part 745 (RRP rule) and 29 CFR 1926.62	**High** **Possible / Serious injury**	2.1 Lead paint dust and fumes: see step 1 for the full controls [Administrative] 2.2 Use low-dust products, such as dust-reduced or pre-mixed compounds. [Substitution] 2.3 Seal off the work area with plastic sheeting in occupied buildings. [Engineering (guarding)] 2.4 Use tools with dust extraction and a vacuum for clean up. [Engineering] 2.5 Lightly mist the area with water to keep dust down, away from anything electrical. [Engineering] 2.6 Never dry sweep or blow dust off with compressed air. [Administrative] 2.7 Wear a dust mask and safety glasses. [PPE]	**Low** **Rare / Serious injury**	Site supervisor
3	Post warning signs and contain the area: indoors, close and cover ducts and cover the floor 6 feet past the work; outdoors, cover the ground 10 feet out and close doors and windows within 20 feet (40 CFR 745.85(a)(1), (2))	Lead paint dust and fumes Public entering the work area Rules: 40 CFR Part 745 (RRP rule) and 29 CFR 1926.62	**High** **Possible / Serious injury**	3.1 Lead paint dust and fumes: see step 1 for the full controls [Administrative] 3.2 Fence off the site with secure temporary fencing and lock the gates when you leave. [Engineering (guarding)] 3.3 Give pedestrians a safe, marked path around the work, with ramps for strollers and wheelchairs. [Engineering (guarding)] 3.4 Use hoarding, covered walkways or catch fans where work is above public areas. [Engineering] 3.5 Put signs at each entry: site name, contact number and "No unauthorized entry". [Administrative] 3.6 Make the site safe at the end of each day: cover holes, lower plant, remove ladders and lock tools away. [Administrative] 3.7 Use a spotter when moving plant or materials across public paths. [Administrative]	**Low** **Rare / Serious injury**	Site supervisor
4	Put on coveralls and a fitted respirator, and set up a wash point	Lead paint dust and fumes Hazardous chemicals Rules: 40 CFR Part 745 (RRP rule) and 29 CFR 1926.62; 29 CFR 1926.59 Hazard Communication	**High** **Possible / Serious injury**	4.1 Lead paint dust and fumes: see step 1 for the full controls [Administrative] 4.2 Choose the least harmful product that does the job, for example water-based instead of solvent-based. [Substitution] 4.3 Use chemicals in well-ventilated areas, or use fans and extraction in closed rooms. [Engineering] 4.4 Hazardous chemicals: see step 6 for the full controls [Administrative]	**Medium** **Unlikely / Recordable / lost time**	Site supervisor
5	Mist and wet scrape the paint; no dry sanding or open flame	Lead paint dust and fumes Hazardous chemicals	**High** **Possible /**	5.1 Lead paint dust and fumes: see step 1 for the full controls [Administrative]	**Medium** **Unlikely /**	Site supervisor

#	Job step	Hazards	Risk before	Controls	Risk after	Responsible
		Rules: 40 CFR Part 745 (RRP rule) and 29 CFR 1926.62; 29 CFR 1926.59 Hazard Communication	**Serious injury**	5.2 Read the Safety Data Sheet (SDS) and labels before use, following OSHA Hazard Communication. [Administrative] 5.3 Keep chemicals in labeled containers. Never pour them into drink bottles. [Administrative] 5.4 Hazardous chemicals: see step 6 for the full controls [Administrative]	**Recordable / lost time**	
6	Use chemical strippers with ventilation and chemical gloves	Hazardous chemicals Flammable liquids and gases Rules: 29 CFR 1926.59 Hazard Communication; 29 CFR 1926.152	**High Unlikely / Fatality**	6.1 Choose the least harmful product that does the job, for example water-based instead of solvent-based. [Substitution] 6.2 Use chemicals in well-ventilated areas, or use fans and extraction in closed rooms. [Engineering] 6.3 Read the Safety Data Sheet (SDS) and labels before use, following OSHA Hazard Communication. [Administrative] 6.4 Keep chemicals in labeled containers. Never pour them into drink bottles. [Administrative] 6.5 Store chemicals away from heat, food and drink, and keep products that react with each other apart. [Administrative] 6.6 Have eye wash and a spill kit nearby, and wash hands before eating. [Administrative] 6.7 Wear chemical-resistant gloves and safety glasses or goggles as listed on the SDS. [PPE] 6.8 Use a respirator with the right cartridge if the SDS calls for one. [PPE] 6.9 Use non-flammable or water-based products where you can. [Substitution] 6.10 Keep ignition sources away: no smoking, no hot work and no running engines near flammables. [Engineering (guarding)] 6.11 Store fuels and solvents in approved, closed containers in a ventilated area away from the work. [Engineering] 6.12 Refuel equipment outdoors with the engine off and cool. [Administrative] 6.13 Keep only what you need for the day on site. [Administrative] 6.14 Store gas cylinders upright, secured and outdoors. [Administrative] 6.15 Keep a suitable fire extinguisher where flammables are used or stored. [Administrative] 6.16 Wear chemical gloves and safety glasses when pouring or mixing. [PPE]	**Medium Unlikely / Recordable / lost time**	Site supervisor
7	Use a heat gun only below 1,100 degrees F, and never an open flame or torch (40 CFR 745.85(a)(3))	Burns from hot surfaces Fire from hot works Lead paint dust and fumes Rules: 29 CFR 1926.352 and NFPA 51B (35 ft rule also in 1910.252(a)); 40 CFR Part 745 (RRP rule) and 29 CFR	**Critical Possible / Fatality**	7.1 Isolate heating systems and let parts cool before you touch them. [Elimination] 7.2 Fit guards or insulation on hot pipes and equipment. [Engineering] 7.3 Mark hot items with chalk or a "HOT" sign so others know. [Administrative] 7.4 Keep a first aid kit and cool running water nearby for burns. [Administrative]	**Medium Rare / Fatality**	Site supervisor

#	Job step	Hazards	Risk before	Controls	Risk after	Responsible
		1926.62		7.5 Wear heat-resistant gloves and long sleeves. [PPE] 7.6 Use cold work methods where you can, such as bolting, press fittings or cutting with a saw instead of a torch. [Elimination] 7.7 Move anything that can burn at least 35 feet away, or cover it with fire blankets. [Engineering (guarding)] 7.8 Use fire-resistant screens to stop sparks reaching people or gaps in walls and floors. [Engineering] 7.9 Get a hot work permit before starting. [Administrative] 7.10 Keep a charged fire extinguisher and fire blanket at the work spot. [Administrative] 7.11 Lead paint dust and fumes: see step 1 for the full controls [Administrative]		
8	Clean with a HEPA vacuum and wet wipes, never dry sweep	Lead paint dust and fumes Poor housekeeping and waste Rules: 40 CFR Part 745 (RRP rule) and 29 CFR 1926.62	**High** **Possible / Serious injury**	8.1 Lead paint dust and fumes: see step 1 for the full controls [Administrative] 8.2 Order materials to size and send packaging back where you can. [Elimination] 8.3 Put dumpsters and waste chutes close to the work. [Engineering] 8.4 Clean as you go, and do a full clean up at the end of each day. [Administrative] 8.5 Keep exits, stairs and walkways clear at all times. [Administrative] 8.6 Stack materials neatly on level ground, away from edges. [Administrative] 8.7 Wear gloves when handling waste. [PPE]	**Low** **Rare / Serious injury**	Site supervisor
9	Bag waste, remove coveralls in the work area and wash before eating	Lead paint dust and fumes Rules: 40 CFR Part 745 (RRP rule) and 29 CFR 1926.62	**High** **Possible / Serious injury**	9.1 Lead paint dust and fumes: see step 1 for the full controls [Administrative]	**Low** **Rare / Serious injury**	Site supervisor
10	Do the RRP cleaning verification before removing plastic and letting occupants back in	Lead paint dust and fumes Working in an occupied home or building Rules: 40 CFR Part 745 (RRP rule) and 29 CFR 1926.62	**High** **Possible / Serious injury**	10.1 Lead paint dust and fumes: see step 1 for the full controls [Administrative] 10.2 Working in an occupied home or building: see step 1 for the full controls [Administrative]	**Low** **Rare / Serious injury**	Site supervisor

Risk key: risk = likelihood x consequence on a 5 x 5 matrix. Low, Medium, High, Critical. Work must not start while the risk after controls is high or above. Controls are listed in order of the hierarchy of controls: Elimination, Substitution, Engineering (guarding), Engineering, Administrative, PPE.

3. PPE AND PERMITS

Required PPE	Permits and plans
Safety glasses (ANSI Z87.1) Half-face respirator (P100 cartridges)	Hot work permit (fire watch at least 60 minutes after, NFPA 51B)

Required PPE	Permits and plans
Coveralls Chemical-resistant gloves Safety-toe boots (ASTM F2413) Work gloves N95 respirator High-visibility safety apparel, ANSI/ISEA 107 Class 2 or 3 (Type R near roadways) Safety goggles (ANSI Z87.1) Welding gloves Face shield (ANSI Z87.1)	

4. PLANT AND EQUIPMENT

Plant / equipment	License or training needed	Inspection needed	Rego / ID	Last inspected	Certificate / report
Heat gun		Visual check of cord, plug and guards before each day's use; if you run an assured equipment grounding program instead of GFCIs, test every 3 months (29 CFR 1926.404(b)(1))			
HEPA vacuum		Visual check of cord, plug and guards before each day's use; if you run an assured equipment grounding program instead of GFCIs, test every 3 months (29 CFR 1926.404(b)(1))			
Power sander		Visual check of cord, plug and guards before each day's use; if you run an assured equipment grounding program instead of GFCIs, test every 3 months (29 CFR 1926.404(b)(1))			
Hand tools					

5. TRAINING REQUIRED FOR THIS WORK

- Lead training under 29 CFR 1926.62(l); EPA RRP Certified Renovator for pre-1978 homes and child-occupied facilities; respirator fit test and medical evaluation (29 CFR 1910.134)
- Hazard communication training on the written program, labels and SDS (29 CFR 1910.1200(h), via 1926.59); respirator fit test and medical evaluation if a respirator is used (29 CFR 1910.134)

6. CREW TRAINING AND CERTIFICATIONS

Crew listed at sign-on below, with ticket and licence numbers.

7. EMERGENCY ARRANGEMENTS

Emergency number	911	**First aid kit**	In the work vehicle
Fire extinguisher	In the work vehicle	**Alarm and evacuation**	Shout for help and stop work. Make the area safe and go to the assembly point. Call the emergency number and send someone to meet the ambulance.
Reporting incidents	Report a fatality to OSHA within 8 hours, and an in-patient hospitalization, amputation or eye loss within 24 hours.		

8. MONITORING, REVIEW AND LEGAL BASIS

A competent person inspects the job site, materials and equipment before work each day and as conditions change (29 CFR 1926.20(b)(2)). Any time this JHA is revised, the affected crew is re-briefed and signs again.

Legal basis: OSH Act Section 5(a)(1) and 29 CFR 1926, Safety and Health Regulations for Construction (incl. 1926.20 and 1926.21). OSHA requires employers to find and fix hazards and to train workers on them. A JHA breaks the job into steps, lists the hazards in each step and the controls that protect the crew. General contractors often require one before you start.

Keep this JHA on site during the job, and keep it with the training and inspection records for at least 1 year after the job (longer if your state plan or general contractor requires it). OSHA does not set a retention period for JHAs themselves.

9. REVISION HISTORY

Rev	Date	By	What changed
1	Nov 9, 2026		First issue

10. SIGN-OFF

	Name	Signature	Date	
Prepared by				
Supervisor				
General contractor review				Accepted for use: Yes / No

By signing below, each crew member confirms they were trained on the hazards and controls in this JHA before work started, and will follow it. Stop work and tell the supervisor if conditions change.

Name	Role / company	Tickets / licences	Signature	Date

Name	Role / company	Tickets / licences	Signature	Date