



Commission on Health and Safety and Workers' Compensation (CHSWC)

September 30, 2025

DOSH

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Occupational Safety and Health Act of 1970

"To assure safe and healthful working conditions for working men and women; by authorizing enforcement of the standards developed under the Act; by assisting and encouraging the States in their efforts to assure safe and healthful working conditions; by providing for research, information, education, and training in the field of occupational safety and health; and for other purposes. Be it enacted by the Senate and House of Representatives of the United States of America in Congress assembled, That this Act may be cited as the "Occupational Safety and Health Act of 1970."

Cal/OSHA Mission Statement

The Division of Occupational Safety and Health (DOSH), better known as Cal/OSHA, protects and improves the health and safety of working men and women in California and the safety of passengers riding on elevators, amusement rides, and tramways – through the following activities:

- Setting and enforcing standards
- Providing outreach, education, and assistance
- Issuing permits, licenses, certifications, registrations, and approvals



Today's Topics

- I. Cal/OSHA Improving to Better Serve California Workers and Employers
- II. Agricultural Enforcement Task Force & Outreach Unit
- III. SB1350: Domestic Worker Protections
- IV. Standards Updates
 - Lead (Pb)
 - Fall Protection

California State Auditor Report

Key Findings

1. Insufficient documentation for closing cases:
2. Inconsistent review of the IIPP
3. Delayed response times
4. Ineffective enforcement of workplace safety
5. Root causes:
 1. Staffing shortages and
 2. Outdated processes and policies

Key Recommendations

1. Revise policies and procedures to ensure personnel:
2. Provide thorough rationales explaining why decisions were not to conduct on-site inspections
3. Document detailed evaluations of Er's (IIPP)
4. Document supporting evidence that employers have abated violations.
5. Include rationales and supporting evidence for:
 1. Penalty calculations.
 2. And fine reductions negotiated with employers.
6. Develop and implement a plan to reduce the Cal/OSHA Enforcement Branch's vacancy rate to 20% or less.



Cal/OSHA: Improving to Better Serve California Workers and Employers



Cal/OSHA Protecting Workers and Educating Employers on Workplace Safety

- Cal/OSHA is the largest state-run OSHA program in the country.
- The Division establishes and enforces workplace safety and health regulations (primarily under Title 8 of the California Code of Regulations) and investigates workplace incidents/accidents.
- Cal/OSHA offers consultation to employers on how to improve workplace safety and health, including on-site visits, hazard identification, and training on safe work practices.
- A diverse and professional workforce is working across California to uphold Cal/OSHA's mission of protecting workers. This workforce includes Safety Engineers, Industrial Hygienists, Doctors, Nurses, Attorneys, Program Analysts, Office Technicians, and others.
- The Division values its partnerships with community-based organizations (CBOs), employers and associations, and sister agencies such as the Labor Commissioner's Office and Division of Workers'

Modernization: Improved Systems

Cal/OSHA is developing a new data management system to modernize how inspections and investigations are conducted and tracked. This significant technology upgrade will:

- ❑ Streamline internal processes by significantly reducing the use of paper files and forms.
- ❑ Standardize and improve data accuracy and collection.
- ❑ Make it easier for workers to confidentially file and check the status of a complaint through a new public-facing portal.
- ❑ Improve documentation of violations.
- ❑ Improve transparency by ensuring consistent tracking and follow-up.

In this multi-year project, Cal/OSHA has obtained funding, contracted with a vendor, and is working to develop the new system.

Clear and Consistent Processes

To ensure greater consistency, accountability, and alignment across the division, Cal/OSHA is updating and clarifying internal procedures:

- ❑ Citations will be completed with proper documentation and reviews to ensure that critical deadlines are met.
- ❑ Justification for settlements will be recorded uniformly on a new form
- ❑ Internal policies are being updated to modernize procedures and align with federal OSHA.
- ❑ A DIR internal audit team will conduct future audits, which will provide an unbiased examination of Cal/OSHA's operations.



Hiring

Challenges

- Talent Shortage and Attracting the Right Candidates:
 - ❖ Finding Industrial Hygienists
 - ❖ Finding Bilingual Engineers
 - ❖ Finding Qualified Staff in Rural Areas
- Managing a lengthy hiring process

Strategies

- Emergency Hiring:
 - ❖ Outreach to candidates
 - ❖ Conducting in-person hiring events
- Adding support staff capacity in Cal/OSHA and DIR-HR to support hiring managers
- Conducting workload assessments
- Marketing campaign geographically

Increased Hiring Strategies

- Created online exams to reach a broader pool of candidates.
- Dedicated Enforcement Recruitment Unit to expedite the hiring process
- Participated in more than 60 hiring events – online and in-person – over the past year with more future events planned through the end of the year.



Bureau of Investigations

- Cal/OSHA BOI investigates the most serious workplace accidents as an adjunct to Cal/OSHA's civil enforcement branch
 - Refers for prosecution cases involving willful violations of safety regulations and laws
 - Recently expanded to 8 investigators located statewide, decreasing response time and improving capacity
 - ❖ Added a Chief Investigator and BOI Attorney Supervisor
 - ❖ Added 7 dedicated attorneys to advance criminal referrals





Agricultural Enforcement Task Force and Outreach Unit

Mission

- ❑ Improve the health and Safety of CA agricultural workplaces
- ❑ Enforce health and safety regulations
- ❑ Conduct proactive planned inspections.
- ❑ Provide Education to workers and employe on workplace rights and labor law requirements,
- ❑ Build trust through strong partnerships
- ❑ Host workshops and seminars
- ❑ Work outreach events with sister agencies and community partners.



Agricultural Enforcement Task Force and Outreach Unit Offices

1 – El Centro (Imperial County)

Satellite Desks

- Imperial County
- San Diego County
- Riverside County
- San Bernardino County

2 – Bakersfield (Kern County)

Satellite Desks

- Tulare County
- Fresno County

3 – Salinas (Monterey County)

Satellite Desks

- San Luis Obispo County
- Santa Barbara County
- Ventura County

4 – Lodi (San Joaquin County)

Satellite Desks

- Merced County
- Madera County

5 – San Francisco (San Francisco County)

Satellite Desks

- Sonoma County
- Butte County (Chico)
- Humboldt County (Eureka)



California Agricultural Employment 2023 Annual Average



Agricultural Enforcement Task Force and Outreach Unit



Outreach and Hotline Unit

Will provide outreach and education to stakeholders.

- Unions, community-based organizations, Interfaith-based, and agricultural workers about DOSH programs and rights that Cal/OSH protects
 - [Outreach Request Form](#)
- Hotline will be staffed by bilingual staff
 - Workers can call for tips and insights into unsafe working conditions



Community Partnership California Workplace Outreach Project (CWOP)

\$25.2 million awarded to 89 Organizations





SB 1350 and Protecting Domestic Service Workers



Today's Topics

What is Senate Bill 1350 (SB 1350)?

Who is Considered an Employer under SB 1350?

When May a Private Household Be Subject to Title 8?

What is SB 1350?

- Governor Newsom signed into law Senate Bill 1350 in 2024
- Extends Title 8 protections to workers hired by businesses to perform household domestic services, and in certain circumstances, workers employed by private households
- SB 1350 went into effect on July 1, 2025



SB 1350: Who is covered?

Businesses that employ household domestic service workers

- Applies to both temporary and permanent workers
- Examples of businesses that will be covered include housecleaning companies, homecare agencies, and residential landscaping and gardening companies
- There are some exceptions ...



When May a Private Household Be Subject to Title 8?

Painting Exterior of a Home



Re-Roofing a House



Fire Remediation and Clean-Up



Pool Maintenance that Requires a License



Home Construction or Remodeling



Mold Remediation and Clean-Up



When May a Private Household Be Subject to Title 8?

Title 8 and Contractors

Some work performed at a home requires a Contractors State License Board (CSLB) license:

- If a homeowner hires a licensed contractor, the contractor is typically considered the employer subject to Title 8
- If a homeowner hires an individual to perform work that requires a CSLB license, and the individual does not have a license, then the individual is considered an employee covered by Title 8¹

➡ In such cases, the homeowner may come under the coverage of Title 8

¹ Labor Code 2750.5(c) (“... any person performing any function or activity for which a license is required ... shall hold a valid contractor’s license as a condition of having independent contractor status”).

When May a Private Household Be Subject to Title 8?

Work that Requires a License

A CSLB license is generally required for work that involves construction, demolition, excavation, and tree trimming above certain heights.

- The CSLB website provides information on the types of work that require a CSLB license <https://www.cslb.ca.gov>.
- A contractor's license can be verified on the CSLB website at <https://www2.cslb.ca.gov/online services/checklicense/checklicense.aspx>

When May a Private Household Be Subject to Title 8?

Title 8 and Rental Properties

As was the case prior to SB 1350

- Work performed on properties that are used for the purpose of rental income and are not a homeowner's residence is covered by Title 8 and subject to Cal/OSHA's jurisdiction.

<https://www.dir.ca.gov/dosh/Domestic-Service-Workers/Guidance-and-Resources.html>

Domestic Service Workers (SB 1350)

Guidance and Resources from Cal/OSHA

► [español](#)



California Senate Bill 1350 (SB 1350) extends workplace safety and health protections to workers who are employed by a business to perform household domestic services, and in certain circumstances, workers employed by private households.

These protections and requirements are in effect and enforceable starting on July 1, 2025.



Cal/OSHA

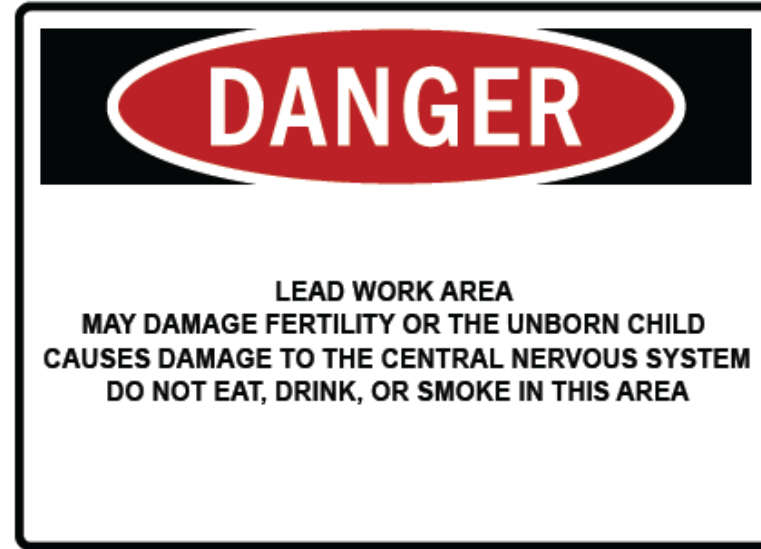
Revisions to Occupational LEAD Standards

Sections
1532.1, and 5198



Apply to Sections:

- 1532.1 Construction
- 5198 General Industry



Effective Date:

- Revisions effective January 1, 2025
- A few provisions become effective January 1, 2026

Need for Revisions

The current lead standards:

- GISO reg in place since 1978; CSO since 1993
- Allow airborne lead exposures that can lead to blood lead levels that are now known to be dangerous
- Can result in serious illness and early death, primarily due to cardiovascular disease
- Fail to detect low-level lead poisoning

Changes to Lead Standards

- Blood lead levels (BLLs) are affected by exposure via inhalation to airborne lead and lead ingestion
- In 2013, CDPH recommended a much lower PEL for lead. Their PEL was based on modeling that determined the relationship between exposure to lead in air and resulting BLLs
- Goal of changes to standards is to reduce BLLs to $<10 \mu\text{g}/\text{dl}$ for nearly all employees with occupational exposure to lead
 - this will be accomplished with a reduced PEL along with a suite of additional revisions, such as more stringent hygiene requirements to reduce lead ingestion and increased blood lead testing to detect elevated BLLs

Changes to Lead Standards

Permissible Exposure Limit and Action Level

- Lower **PEL** from 50 $\mu\text{g}/\text{m}^3$ to 10 $\mu\text{g}/\text{m}^3$
- Lower **Action Level** from 30 $\mu\text{g}/\text{m}^3$ to 2 $\mu\text{g}/\text{m}^3$

Trigger Tasks and Presumed Significant Lead Work

When an exposure assessment has not been done, **interim protections** are required for employees:

- **Construction 1532.1**
 - Level 1, 2 and 3 trigger tasks
 - Trigger tasks – not listed
- **General Industry 5198**
 - Presumed Significant Lead Work

Trigger Tasks (Construction)

Level 1, 2, and 3 trigger tasks + unlisted tasks

- **Level 1: No Greater than 10x PEL**
 - Manual demolition, manual scraping and heat gun applications.
- **Level 2: Above 10x the PEL but not greater than 50x PEL**
 - Spray Painting with lead paint, manual sanding, and power tool cleaning, grinding, or sanding with dust collection systems.
- **Level 3: Above 50x PEL**
 - Using lead-containing mortar or lead burning.
 - a. Rivet busting.
 - b. Power tool cleaning, grinding or sanding without dust collection systems.
 - c. Cleanup activities involving the use of dry expendable abrasives.
 - d. Abrasive blasting.
 - f. Welding Torch cutting. Torch burning.
 - **Dry abrasive blasting** limited:
 - 5 hrs/day (until 12/31/29)
 - 2 hrs/day (starting 1/1/30)

Additional Definitions to 5198 General Industry

1. Presumed Significant Lead Work (PSLW)

- (1) Altering or disturbing material that is:
 - (A) known to contain lead at a concentration $\geq 0.5\%$ by weight
 - (B) reasonably anticipated to contain lead at a concentration $\geq 0.5\%$ by weight
- (2) Torch cutting any scrap metal
 - Exception if combined total duration < 8 hours in any 30-day period

2. Separate Engineering Control Air Limit (SECAL)

- SECALs have been specified for selected processes in **lead-acid battery manufacturing** and **lead-acid battery recycling**
- processes, SECALs and implementation dates are listed in **Table 1**
- employer must ensure employee exposure \leq PEL, but only required to use engineering and work practice controls to reduce and maintain exposure \leq SECAL; supplement these controls with respirators to achieve the PEL

Engineering Controls Separate Engineering Control Airborne Limit (SECALs)

Lead Acid Battery Manufacturing and Recycling

Table 1 -- Separate Engineering Control Airborne Limits (SECALs) for Selected Processes; Implementation Schedule

<i>Industry</i>	<i>Process</i>	<i>SECAL and Implementation Dates</i>
Lead acid battery manufacturing	Oxide production; paste mixing; grid pasting and parting; and battery assembly.	50 µg/m ³ on January 1, 2025, then 40 µg/m ³ on January 1, 2030.
	Grid production and small parts casting; and plate formation.	50 µg/m ³ on January 1, 2025, then 30 µg/m ³ on January 1, 2030.
Lead acid battery recycling	Laboratory processes.	50 µg/m ³ on January 1, 2025, then 30 µg/m ³ on January 1, 2030.
	Movement of lead ingots and blocks into storage areas.	
	Movement of lead ingots and blocks for shipping.	
	Maintenance processes.	

Exposure Monitoring

Frequency of air monitoring

- $< \text{AL}$ ($2 \mu\text{g}/\text{m}^3$): no further monitoring required
- $\geq \text{AL}$, $< 30 \mu\text{g}/\text{m}^3$: monitor every 12 months (only new requirement)
- $\geq 30 \mu\text{g}/\text{m}^3$, $\leq 50 \mu\text{g}/\text{m}^3$: monitor every 6 months
- $> 50 \mu\text{g}/\text{m}^3$: monitor every 3 months

Compliance Program

1. Written Plan
2. Engineering Controls and Work Practices
3. Respiratory Protection
4. Protective Work Clothing and Equipment
5. Housekeeping and Hygiene Practices
6. Employee Training
7. Medical Surveillance Program
8. Exposure Monitoring
9. Recordkeeping
10. Program Evaluation and Update

Engineering Control & Work Practice & Administrative Controls

- Choose tools, materials, and ventilation to reduce airborne lead exposures.
- Control how work is conducted (work scheduling, etc.) to further reduce airborne exposures.
- Implement a job rotation schedule to reduce employees' TWA exposures.

Respiratory Protection

Construction

If filtering facepieces are used, they must be:

- N100
- R100
- or
- P100
- N95s are not adequate

General Industry

• If filtering facepieces are used, they must be:

- N100
- R100
- or
- P100
- N95s are not adequate

Protective Work Clothing

- Protective Work Clothing is required for employees exposed to lead above the PEL (without regard to the use of respirators).
- And required for employees who perform Presumed significant lead work (PSLW).



Hygiene Facilities and Practices

- **Construction**

- Washing Facilities
- Handwashing
- Special cleansing compounds
- Eating areas
- Regulated areas
- Showers for Level 3 tasks
- No PPE in vehicles

- **General Industry**

- Washing Facilities
- Handwashing
- Eating areas
- Change rooms
- Showers
- Lunchroom facilities

Note: Food and beverages, tobacco, and cosmetic applications are prohibited

Exception for access to potable water; need training and written safe hydration procedures



Medical Surveillance Program

The employer must implement medical surveillance for employees exposed to lead at or above the AL, depending on the number of days in any 12 months they are exposed at this level. This includes:

- ☐ Blood lead testing and employee notification.
- ☐ Medical examination and consultations.
- ☐ Temporary medical removal protection, where necessary.

Medical Removal Protection

Construction

Blood Lead ≥ 30 $\mu\text{g/dL}$ in a single test:

- Average of last 3 tests ≥ 20 $\mu\text{g/DI}$
- When a physician recommends removal due to medical condition related to lead

General Industry

Same thresholds:

- **Blood Lead ≥ 30 $\mu\text{g/dL}$** (single test)
- Average ≥ 20 $\mu\text{g/dL}$ (last 3)
- Physician recommendation

Signage Requirements

The employer shall post a warning sign:



Training Requirements

Compliance
Plan

Health effects
of lead

Use of
respirators and
PPE

Hygiene
practices

Medical
surveillance

Engineering
controls

Employee
Rights

Language
Understandable
to Employees

Training on the
Standard

Record Keeping

- Exposure assessment
- Written compliance program review
- Medical surveillance
- Written elevated blood lead level response plans
- Medical removals
- Training

Resources: Cal/OSHA Publications

- <https://www.dir.ca.gov/dosh/PubOrder.asp#Lead>

[The Cal/OSHA Lead in Construction Regulation – A Guide for Employers](#)

[General Industry Lead Standard: What Employers Need to Know - Executive Summary](#)

[Lead in Construction: Executive Summary](#)

[Lead in Construction - Information for Employees Fact Sheet](#)

[Lead in Construction - Information for Employers Fact Sheet](#)

[Lead in General Industry - Information for Employees Fact Sheet](#)

[Lead in General Industry - Information for Employers Fact Sheet](#)

[Model Written Lead Compliance Program for Construction Work](#) 

[Model Written Lead Compliance Program for General Industry](#) 



Residential Fall Protection Regulation Update



Background

- California's 15 ft. trigger heights for residential construction, and varying trigger heights for residential roofing operations, did not provide California workers with protection from falls equal to that of the **Fed-OSHA six-foot trigger height**.
- **Effective July 1, 2025**, Cal/OSHA lowered the fall protection trigger height for **residential construction and roofing** from **15 feet down to 6 feet**, aligning with federal OSHA's standard

Key Requirement: Fall Protection at 6 Feet

- Title 8, Section 1716.2 – Wood and Light-Gauge Steel Frame Construction (Residential/Light Commercial)
- Title 8, Section 1731 – Residential-Type Roofing Activities
- Title 8, Article 24 – General Construction Fall Protection

Thank You!

