1.0 Purpose and Scope

This procedure describes the lead (Pb) safe renovation, repair, and painting procedure for WHOI housing and other buildings constructed before 1978 that may be defined as a child-occupied facility. This procedure is aimed at protecting against lead-based paint hazards associated with renovation, repair, and painting activities. The following items and activities are not subject to this procedure:

- Housing built in 1978 or later;
- Housing for elderly or disabled persons, unless children under 6 reside or are expected to reside there.
- Zero-bedroom dwellings (studio apartments, dormitories, etc);
- Housing or components that have been declared lead-free (such a declaration can be made by a certified inspector, risk assessor or lead-safe renovator/supervisor); and
- Minor repair and maintenance activities that disturb 6 square feet or less of painted surfaces per inside room or 20 square feet or less of painted surfaces on the exterior of the housing unit or building.
- NOTE: minor repair and maintenance does not include window replacement, demolition, or prohibited practices.

2.0 Roles and Responsibilities

Facilities Director:

- Ensure that all applicable requirements of 454 CMR 22 (Massachusetts Deleading and Lead-Safe Renovation Regulation) and 40 CFR 745 (EPA’s Renovation, Repair, and Painting Rule) are followed, including: licensing, certifications, worker protection, occupant protection, approved work practice controls, occupant notification, waste management, and recordkeeping.
- Designates and approves a certified/licensed contractor and/or WHOI personnel certified as lead-safe renovator/supervisor, inspector, or risk assessor for testing of potentially lead-containing paint.
- Prior to commencement of work, ensure that all building repair, renovation and maintenance projects with potential for lead-based paint are properly evaluated for the presence of lead by a certified lead-safe renovator/supervisor, inspector, or risk assessor.
- Ensures that all lead renovation and deleading work is performed by certified/licensed contractors in accordance with 454 CMR 22 and 40 CFR 745.
- As necessary, coordinates lead abatement and renovation projects with the EH&S office.

Environmental Health and Safety Director:

- Provide assistance to the Facilities Department and building occupants for work covered by this procedure, including waste management, awareness level training, investigating employee concerns, and other related functions as necessary.
- Maintains this procedure.

3.0 Procedure

Prior to initiating any of the above activities, painted surfaces must be tested by a certified lead-safe renovator/supervisor, inspector, or risk assessor using an EPA recognized test kit (as specified by 40 CFR 745)
and following the kit manufacturer's instructions, for the presence of lead equal to or in excess of 1.0 milligrams/cm² or 0.5% by weight.

- If the surfaces exceed the above limits or if the testing is not performed, the work subject to this procedure must be conducted by certified/licensed lead-safe renovator/supervisor and follow prescribed work practices, as per 454 CMR 22 and 40 CFR 745. Note: building occupants may need to be notified prior to renovation activities (refer to 454 CMR 22 and 40 CFR 745).
- Results of the testing, including a schematic diagram, must be maintained in accordance with 454 CMR 22 and 40 CFR 745.

4.0 Prohibited Practices

WHOI personnel are not allowed to perform any of the following activities on any surface that contains lead paint:

- Open-flame burning or torching of lead based paint;
- Use of heat guns with temperatures greater than 1,100 F; and
- Use of machines or power tools that remove lead-based paint through high speed operation, such as sanding, grinding, power planning, needle gun, abrasive blasting, or sandblasting, unless such machines have approved containment systems and are equipped with a HEPA vacuum attachment. NOTE: These machines and power tools must be operated so that no visible dust occurs outside of the containment system.

5.0 Clean-up and Disposal

Lead-based paint chips, dust, and debris must be properly contained with approved methods during all work that is subject to this procedure. Waste materials that are potentially lead-containing must be disposed in accordance with MA/DEP regulations and WHOI’s Hazardous Waste Management Procedure. The Facilities Director, or designee, shall coordinate disposal of this lead-containing waste with the EH&S office.

6.0 Training

Lead (Pb) awareness training is required for WHOI personnel who have potential to work with and disturb lead painted surfaces. This training is provided by the EH&S office and is covered during the Asbestos and Lead Safety Awareness Training. Certified lead-safe renovators/supervisors must be trained in accordance with 454 CMR 22 and 40 CFR 745.