



Residential Lead Paint Fact Sheet 7

Renovation Project Safety

Before Beginning a Renovation Project

Prior to **any work or disturbance of building components** in target housing (pre-1978 dwellings) or [child-occupied facilities](#), check the property files for:

- Lead inspection reports performed by licensed lead inspectors
- Asbestos surveys/data performed by licensed asbestos inspectors

If asbestos or lead sampling data does not exist or is not available for the specific material(s) being disturbed, inspection(s) by licensed professional(s) (e.g., TRC, EHI, etc.) must be conducted for those specific materials and/or layers of materials to be disturbed.

Determine if property/unit has been issued a letter of full compliance by licensed lead inspector.

Determine if the activity or work to be performed is considered **renovation project work or deleading project work**. The intent of a renovation project is generally not to remove or get rid of lead, but rather an activity that will impact lead as a result of the work.

“Renovation, repair or painting in any Target Housing or Child Occupied Facility, or portion thereof, which results in or may result in disturbance of lead paint or lead paint debris, but which is distinguished from a deleading project by one of the following conditions:

- (a) The work is carried out in or on a structure which is required to be delead by MA Lead Law but is unrelated to deleading compliance, both in terms of purpose and effect.*



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(b) The work is carried out in or on a structure which is not required to be delead by MA Lead Law, and the purpose of the work is other than the achievement of a Letter of Compliance.”

All renovation projects which may disturb lead in target housing or child-occupied facilities must be performed by [Massachusetts licensed lead-safe renovators and trained personnel](#).

Minor repair and maintenance activity (e.g., disturbing less than six square feet of lead paint per room indoors and less than 20 square feet of lead painted surface outdoors), other than window replacement and demolition, is exempt from Massachusetts lead laws. All renovation work conducted in the same room within 30 days is considered part of the same job.

Only [licensed deleading contractors](#) can perform deleading work. Deleading work is usually performed with the intent to remove or get rid of lead paint or is work involving lead considered high-risk (i.e., window removal, demolition). Deleading work is “work done to achieve compliance with the Massachusetts lead law through the abatement of lead paint hazards” or specific high-risk deleading activities (i.e., window removal, demolition).

When performing deleading work, owners must ensure that the following parties receive appropriate notice prior to any deleading work:

- Childhood Lead Poisoning Prevention Program
- Department of Labor Standards (DLS)
- Local Board of Public Health
- All tenants living in the building

The residence must be reinspected by a licensed inspector after deleading is complete.



Worker Safety

Workers can be exposed to lead paint and dust during various repair, renovation, and demolition operations. The Occupational Safety and Health Administration (OSHA) has developed regulations to protect workers involved in such construction activities from lead exposure hazards.

Major components of OSHA regulation 29 CFR 1926.62 include:

- A permissible exposure limit (PEL) of 50 micrograms of lead per cubic meter of air averaged over an eight-hour period.
- An action level (AL) of 30 micrograms of lead per cubic meter of air averaged over an eight-hour period.
- A requirement that employers develop and implement a worker protection program.
- Requirements that employers use engineering controls and work practices (i.e., exhaust ventilation, enclosure, or encapsulation), where feasible, to reduce worker exposure.
- Requirements that employees observe good personal hygiene practices, such as washing hands before eating and taking a shower before leaving the worksite.
- Requirements that employees be provided with protective clothing and, where necessary, with respiratory protection in accordance with 29 CFR 1910.134.
- A requirement that employers institute an information and training program and ensure all employees subject to lead exposure at or above the AL participate.
- A requirement that employees exposed to high levels of lead be enrolled in a medical surveillance program.



Waste Collection, Management, and Disposal

Disposal of hazardous waste can be difficult and requires advance planning. To reduce potential delays, contact the designated safety officer (DSO) early in the project. The DSO will work with the EH&S hazardous waste program manager to categorize the waste, determine the proper disposal methods, and if needed, identify and help setup a location where waste will be stored until it is picked up by Harvard's hazardous waste contractor.

The hazardous waste program manager will work with Harvard's hazardous waste contractor to provide the proper materials for collection and will coordinate waste pickup when the job is complete. Only approved Harvard EH&S team members may sign hazardous waste manifests.

Child-Occupied Facilities

Child-occupied facilities refer to buildings, or building portions, that are constructed prior to 1978 and visited regularly by the same child under six years of age on at least two different days within any week (Sunday through Saturday period), provided that:

- Each day's visit lasts at least three hours
- The combined weekly visits last at least six hours
- The combined annual visits last at least 60 hours

Child-occupied facilities may include, but are not limited to, daycare centers, preschools, and kindergarten classrooms. Child-occupied facilities may be located in target housing or in public or commercial buildings.

Assistance

[Harvard EH&S](#) is available to assist and support Harvard property and project managers with issues relating to deleading activities during renovations and general lead law compliance.



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Contact the [Childhood Lead Poisoning Prevention Program](#) for:

- Low-risk deleading training and authorization
- Moderate-risk training courses
- Lead inspectors, risk assessors, and deleading contractors

Additional assistance concerning safety during renovation projects that include deleading activities can be obtained from the:

[Massachusetts DLS Lead Program](#)

Department of Labor and Workplace Development
19 Staniford Street, 2nd Floor
Boston, MA 02114
617-626-6960

[OSHA Lead Program](#)

OSHA Region I
JFK Federal Building,
25 New Sudbury Street, Room E340
Boston, MA 02203
617-565-9860