

X02.2 Manage Lead Paint Hazards- 2: Lead action plan

Technical Document

WELL Building Standard™ version 2 (WELL v2™), Q1 2021 addenda



HOW TO USE THIS DOCUMENT:

This document is intended to serve as a guide on how to create a project **technical document to manage risks of human exposure to hazardous materials ubiquitously used in past construction practices.**

This document is meant to demonstrate an acceptable degree of detail for a documentation submission. The Feature cannot be demonstrated solely through a confirmation that the requirements have been or will be implemented. The level of detail is up to the discretion of the project team, but the documents must include specific details demonstrating that the actual requirements have been enacted in the project boundary.

This document and similar tools are intended to assist projects in their pursuit of WELL v2 but use of this document and/or similar tools are in no way a guarantee of achievement of any rating or designation, and no representation or warranty is made regarding the likelihood of achieving any rating or designation.

Note: The below document is based on the Q1 2021 addenda of the WELL Building Standard™ version 2 (WELL v2™). Project teams are required to implement the feature requirements from the addenda version assigned to their project or any more recent addenda version.

FEATURE PART REQUIREMENTS:

For All Spaces

If lead is found in the investigation, a certified inspector (or a qualified professional where no local regulations apply) implements an action plan that contains the following:

- a. Notification of remediation work to occupants and transient populations in the surrounding spaces, and restriction of access to work areas during remediation.*
- b. If paints are mechanically removed, measures are taken to minimize the formation and spread of dusts during the remediation process and to ensure adequate respiratory and skin protection for workers.*
- c. A re-inspection schedule that includes visual assessments and dust testing, if any lead-containing paints are left in place and are subject to stabilization (i.e., painted over with products to prevent chipping or degradation) or enclosure, at least once every three years.*
- d. Post-remediation clearance, confirming that the lead loading in dust is below the levels deemed hazardous.*

WELL Core Guidance:

Meet these requirements for the extent of developer buildout.



The below sample documentation is intended to provide guidance in creating a technical document. It is not a template. You may note included components that are not required to demonstrate compliance with this Feature.

Example document for Feature X02.2, 2: Lead action plan a-d

The following example is for a new construction building project in a location where lead-containing paints are prohibited for use on interior walls.

X02.1 Option 2 - Technical Document for [PROJECT NAME]

[PROJECT NAME] is a new construction project located in the United States where lead paint was banned by the Environmental Protection Agency (EPA) in 1978. Here is a link to the EPA website confirming the enactment of this law: <https://www.epa.gov/lead/protect-your-family-sources-lead>

The following example is for a new construction interiors project in an existing building in the United States. The base building was built after lead-paint for interior walls related laws were enacted locally.

X02.1 Option 2 - Technical Document for [PROJECT NAME]

[PROJECT NAME] is a new construction interiors project in an existing building [EXISTING BUILDING NAME.] [EXISTING BUILDING NAME] was built in 2011 and is located in the United States where lead paint was banned by the Environmental Protection Agency (EPA) in 1978, so there is no risk of lead paint. Here is a link to the EPA website confirming this law: <https://www.epa.gov/lead/protect-your-family-sources-lead>

The following example is for an existing building project in a location where lead-based paints can still be used in buildings. A lead inspection was conducted, and the report determined that the building contains zero lead-based paints.

X02.2 Option 2 - Technical Document for [PROJECT NAME]

There are no local laws prohibiting lead-based paints in buildings, so a lead inspection was conducted. The report determined that there is zero lead in the building (see attached report). No lead action plan is required.

The following example is for an existing office building project in a location where lead paints can still be used in buildings. The lead inspection report determined that the project contains lead-based paints.

X02.2 Option 2 - Technical Document for [PROJECT NAME]

There are no local laws regarding lead-based paints in buildings, so a lead inspection was conducted by [INSERT NAME OF QUALIFIED PROFESSIONAL AND THEIR QUALIFICATIONS]. The report determined that the building contains lead-based paints. The Lead Action Plan is attached. Below is a summary of the sections of the plan that address X02.2 a-d and page numbers where more detail is located.

Lead Action Plan Summary:

a. Notification of remediation work to occupants and transient populations in the surrounding spaces, and restriction of access to work areas during remediation.

- *Ex: After the inspection was completed, the local authorities [INSERT LOCAL AUTHORITIES' NAME] were notified of the presence of lead. Immediately afterwards, the building occupants were notified by signage in the main lobby and by email regarding the presence of lead-based paints and the plan to remediate them while the building was largely empty due to COVID-19 quarantine practices. The email included dates that certain areas of the building would be closed for remediation. For more details, see page [INSERT PAGE NUMBER] of the Lead Action Plan.*

b. If paints are mechanically removed, measures are taken to minimize the formation and spread of dusts during the remediation process and to ensure adequate respiratory and skin protection for workers.

- *Ex: The contaminated areas were first completely emptied of all furniture and the flooring was covered with plastic sheeting. Contaminated rooms were sealed off from other areas of the building to prevent dust spread and HVAC ducts were covered with plastic sheeting to prevent dust from getting into building systems. To remove the lead, the remediation team regularly wetted down the walls (to prevent dust in the air) and used electric sanders equipped with HEPA filter vacuums. In difficult to access areas, the remediation team used wire brushes. The remediation team was required to wear protective clothing including: full-body coveralls covering the head, shoes covers, disposable gloves and protective eyewear. They were also required to wear half-face dual cartridge HEPA filter respirators during all work. No eating or drinking was permitted on the job site.*

c. A re-inspection schedule that includes visual assessments and dust testing, if any lead-containing paints are left in place and are subject to stabilization (i.e., painted over with products to prevent chipping or degradation) or enclosure, at least once every three years.

- *Ex: It was deemed not cost effective to remove lead-paints in the main lobby and corridors. The paint in these areas was encapsulated by a specialized paint to prevent chipping and future degradation of the lead paint. [LEAD INSPECTOR NAME AND COMPANY] has been scheduled to return in three years in [MONTH, YEAR] to re-inspect and test these areas for lead and ensure that encapsulation is intact.*

Ex: All lead-paint was remediated, no re-inspection is required.

d. Post-remediation clearance, confirming that the lead loading in dust is below the levels deemed hazardous.

- *Ex: The lead inspector [INSPECTOR NAME AND COMPANY] returned once remediation activities were completed and re-inspected the space using in-situ test results by x-ray fluorescence (XRF). They provided a report (attached) confirming that lead remediation was successful and there are no longer lead-based paints within the project space. The report was filed with the local municipality.*

TIPS FOR MULTIPLE LOCATIONS

- Organizations participating in WELL Portfolio or the multiple projects pathway can submit a Guideline for this feature part, as well as a technical document for each audited project. This Guideline must outline the feature requirements, at minimum, and it can be shared across multiple projects as a means to provide guidance for compliance. A subset of audited projects must also each submit their own technical document that demonstrates compliance with the feature requirements.