

X03.1 Manage Exterior CCA Hazards- 1: CCA assessment and remediation

Professional Narrative

WELL Building Standard™ version 2 (WELL v2™), Q4 2022 addenda



HOW TO USE THIS DOCUMENT:

This document is intended to serve as a guide on how to create a project **professional narrative** to **mitigate risks of human exposure to chromate copper arsenate (CCA) and lead**.

This document is meant to demonstrate an acceptable degree of detail for

- precertification documentation submission
- documentation submission

For precertification documentation submission:

To achieve WELL Precertification, project teams may submit intent-stage or implementation-stage documents for pursued features, or any combination of the two. An intent-stage document is typically a draft document that has not yet been implemented in the actual project, while implementation-stage documents describe final and implemented strategies. Intent and implementation-stage documents should be similar in terms of level of detail. For final WELL Certification documentation approval, all documents are required to be implementation -stage. To learn more about intent-stage vs. implementation-stage documentation, review the [precertification guide](#) in our knowledge base.

Intent-stage language is indicated in this sample document with **green text and in parentheses**. For an intent-stage professional narrative the document should consist of specific strategies that the team intends to implement. This document cannot simply state that the feature requirements will be implemented; the documentation should include adequate detail such that a WELL Reviewer will be able to confirm the document complies with all of the WELL feature part requirements.

For documentation submission:

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. The Feature cannot be demonstrated solely through a confirmation that the requirements have been or will be implemented.

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, certification or other designation, and no representation or warranty is made regarding the likelihood of achieving any rating, certification or other designation, and IWBI shall have no liability resulting from the use or content of this document or similar tools or resources or from any action taken or inaction occurring in reliance on this document or similar tools or resources.

Note: The below document is based on the Q4 2022 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

For all existing wood structures installed before the enactment of laws banning chromated copper arsenate (CCA) which lie outside the building envelope but within the project boundary where human presence is expected (e.g., wooden decks, fences near walkways, playgrounds and outdoor furniture), the following requirements are met:

- a. Identify CCA-containing wood through one of the following:*
 - 1. Inspection of purchase records.*
 - 2. Determination of whether legal bans for CCA apply.*
 - 3. Testing for the presence of arsenic in the wood or the soil bearing the wooden structures.*
- b. Address CCA-containing woods through one of the following:*
 - 1. Dispose of CCA-containing woods following applicable laws, without incinerating nor wood chipping.*
 - 2. Treatment with penetrating (non-film-forming), oil-based, semi-transparent stains that prevent arsenic leaching on a regular basis as recommended by the manufacturer.*

WELL Core Guidance:

Meet these requirements for the extent of developer buildout.



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

Example document for Feature X03.1 a and b

The following example is for a new construction building project in a location where there is no external site with wooden decks, fences near walkways, playgrounds or outdoor furniture.

X03.1.1 a and b - Technical Document for [PROJECT NAME]

[PROJECT NAME] has no external decks, patios, or exterior site that might contain wooden decks, fences near walkways, playgrounds or outdoor furniture (it is a zero lot line building with no terraces or accessible rooftop).

The following example is for an interiors project with no patios, roof access, terraces or wooden decks or outdoor furniture.

X03.1.1 a and b - Technical Document for [PROJECT NAME]

[PROJECT NAME] is an interiors project with no decks, roof access, patios or exterior site (like an adjacent backyard) that might contain wooden decks, fences near walkways, playgrounds or outdoor furniture.

The following example is for a new construction project in Australia where CCA-containing wood is restricted.

X03.1.1 a and b - Technical Document for [PROJECT NAME]

[PROJECT NAME] is located in Australia where CCA-containing wood is restricted. [PROJECT NAME] does have a playground and picnic tables within the WELL project boundary, purchased and installed well after Australia's CCA restrictions were enacted, so there is no risk of CCA treated wood. Here is a link to a website indicating the restrictions:
<https://www.betterhealth.vic.gov.au/health/HealthyLiving/copper-chrome-arsenic-cca-treated-timber>

The following example is for an existing project with an exterior site area in a country where CCA-containing wood is not restricted or banned.

X03.1.1 a and b - Technical Document for [PROJECT NAME]

[PROJECT NAME] is an existing project with an exterior site area that includes a wooden deck and wooden deck furniture. CCA is not banned or restricted locally at [LOCATION]. The team has determined (**intent-stage: will determine**) whether or not the exterior wood within the WELL project boundary has CCA by the following methodology:

- Ex: [PROJECT TEAM] was able to locate purchase records of both the wooden deck wood and the wooden deck furniture. The purchase records indicated a supplier for each product. The suppliers were contacted and the team was able to verify that the wood purchased did not contain CCA (see attached letters from the suppliers verifying woods do not contain CCA). The project team did not need to remediate the wood. (**Intent-stage: The suppliers will be contacted and the team will be able to verify whether or not the wood purchased contains CCA and take measures accordingly**)
- Ex: [PROJECT TEAM] was not able to locate purchase records for the wooden deck wood or the wooden deck furniture. [PROJECT TEAM] contacted (**intent-stage: will contact**) a materials testing provider who was able to (**intent-stage: will be able to**) test a sliver of wood from both the deck and furniture for arsenic as well as multiple soil samples taken from open soil adjacent to both the deck and furniture wood. The tests for the wood came back positive, and the tests for the soil came back negative. See attached test results. [ATTACH TEST RESULTS]. **Intent-stage: if tests have not been conducted, no test results need to be attached**)

The team decided to remove the furniture. Since there are no local guidelines on CCA removal, our team has used US

EPA guidelines found on this website: <https://www.epa.gov/ingredients-used-pesticide-products/chromated-arsenicals-cca>. These guidelines prohibit woodchipping and incineration.

For the deck, the team decided to apply *(intent-stage: will apply)* a penetrating (non-film-forming), oil-based, semi-transparent stain that prevents arsenic leaching. It will be re-applied regularly over a time period recommended by the manufacturer. The stain being used *(intent-stage: that will be used)* is [INSERT PRODUCT NAME] and the product sheet is attached [ATTACH PRODUCT SHEET].

TIPS FOR MULTIPLE LOCATIONS

- Organizations participating in WELL at scale should indicate which locations are pursuing this feature, and then submit the specific details for the locations selected for an audit.