

X02.2 - Manage Lead Paint Hazards - 1: Identify lead paint hazards

Technical Document

WELL Building Standard™ version 2 (WELL v2™)

WHAT IS 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

- 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 technical document, the inspection can be planned/the action plan does not have to have been 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 Q1-Q2 2024 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.

HOW TO USE THIS DOCUMENT:

- ☐  Read the [below feature requirements](#) (or the feature requirements from the [addenda version assigned to your project](#), as relevant) and determine how your project addresses each requirement.
 - a. If your project is a WELL Core project, read through and ensure that your project follows the “WELL Core Guidance.”
 - b. Make sure to apply the feature requirements appropriate to your project’s space types. For example, if your project has both dwelling units and other space types, ensure your project is applying the requirements under “For Dwelling Units” to the dwelling unit spaces and applying the requirements under “For All Spaces except Dwelling Units” to the other space types. Check out the [WELL v2™ digital standard](#) for the exact language on your project’s space types.
- ☐  Refer to the [below example document](#) to get an idea of how to set up your documentation.
- ☐  Collaborate with your stakeholders to gather the [relevant documentation](#) that demonstrates the project’s compliance with the feature. Some examples of relevant documentation include:
 - a. a letter from a hired professional outlining services provided
 - b. the project’s floor plans
 - c. a modeling report
- ☐  Create a technical document using existing documentation where relevant, annotating it to clarify where feature requirements are met. Some examples of annotating include:
 - a. highlight the sections relevant to WELL requirements
 - b. circle or add boxes around particular data
 - c. add notes to confirm WELL requirements
 - d. add labels to draw attention to particular sections
 - e. provide an explanation of the connection to WELL requirements using a different colored font
 - f. check out the [WELL Documentation Annotation Guide](#) for more
- ☐  Name the document so that it is easily identifiable. Some examples for naming include:
 - a. name the document using the WELL feature code
 - b. name the document using the WELL feature name
 - c. name the document using the WELL document type
- ☐  Review the document you’ve created and ensure that all the necessary WELL requirements are fully and clearly addressed.
 - a. Note: the level of detail is up to the discretion of the project team, but the document must include specific details demonstrating that the actual requirements have been enacted in the project boundary. Features cannot be demonstrated solely through a written confirmation that the WELL requirements have been or will be implemented.
- ☐  Upload the document to the scorecard in the WELL digital platform, after you’ve confirmed that the document fully and clearly addresses all the necessary WELL requirements.

FEATURE PART REQUIREMENTS

For All Spaces

The following requirements are met:

- a. A certified inspector or a qualified professional where no local regulations apply conducts an investigation of the space and reports the following:
 1. An inventory of locations of potential sources and sinks of lead-containing materials, where lead-containing paint may be present.
 2. Confirmation of lead hazards through in-situ test results by x-ray fluorescence (XRF) or by laboratory analyses of paint chips⁴ and/or surface dusts. Surface dust is considered a hazard if its lead loading is more than 10 µg/ft² of the collection area if sampled from floors or over 100 µg/ft² for dust on interior window sills.⁵ Paints having over 0.5% of lead by weight or 930 µg/ft² of applied area and bare soil containing over 400 ppm of lead by weight are also considered lead hazards.⁵ Lower thresholds mandated by local regulations prevail for terms of hazard assessment.
- b. 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:
 1. Notification of remediation work to occupants and transient populations in the surrounding spaces, and restriction of access to work areas during remediation.
 2. 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.
 3. 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.
 4. 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, 1: Identify lead paint hazards

The following example is for an existing residential building built ten years before lead-based paints were banned for use on interior walls, and English is a second language. The WELL project boundary includes an exterior site area with exposed soils.

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

[PROJECT NAME] was built ten (10) years before local laws banning lead-based paints were enacted, so an inspection was conducted. Lead-based paints and lead in the soils near the parking garage were detected and remediated. Below is a summary of the inspection report, and the full inspection report is attached. *[Intent-stage: The inspection can be planned – information regarding when the inspection will occur and who will be conducting it should be provided.]*

- a. The certificate of occupancy issued by the local municipality after the lead paint remediation was completed is attached. *[ATTACH CERTIFICATE OF OCCUPANCY].*
- b. Investigation summary:
 - a. Professional Inspector: *[NAME, CREDENTIALS, CONTACT]*
 - b. A list of locations where potential sources and sinks of lead-containing materials, where lead-containing paint and lead containing soils may be present:
 - i. *Ex: Paint on walls of all residential units and paints on the exterior of the building*
 - ii. *Ex: Exposed soils near the playground area and in the landscaped areas around flower beds near the garage*
 - iii. *Ex: Interior window sills on floors 3-5 (which were not replaced in the recent renovation)*
 - iv. *Ex: Areas of the basement where there is no record of what paint was used*

Method used for confirming the existence of lead:

- i. *Ex: In-situ test results by x-ray fluorescence (XRF) – sample number and location of samples were determined by local law [INSERT LOCAL LAW] since the requirements in these laws are more stringent than the WELL requirements. The local law requirements are attached to this document and relevant sections are translated into English in annotations on the side of the pdf document.*

ii. Ex: Samples of paint chips, dust and soils were collected in compliance with [INSERT LOCAL LAW] and sent to [NAME OF LABORATORY] for a laboratory analysis. Since there are no local regulations that indicate appropriate lead content, the laboratory compared results to the WELL requirements listed below. The laboratory report is attached and relevant sections have been translated into English. [ATTACH COPY OF LABORATORY REPORT] Here is a list of the WELL requirements that were used:

- 1. Surface dust is considered a hazard if its lead loading is more than 10 µg/ft² of the collection area when sampled from floors*
- 2. Surface dust is considered a hazard if its lead loading is over 100 µg/ft² for dust on interior window sills*
- 3. Paints are considered a hazard if they have over 0.5% of lead by weight or 930 µg/ft² of applied area*
- 4. Bare soil is considered a hazard if it contains over 400 ppm of lead by weight*

c. The Investigation Report provided to the local municipality is attached. Sections of the report that indicate the information above have been annotated with English translations. [ATTACH REPORT – INCLUDE ENGLISH TRANSLATIONS OF RELEVANT SECTIONS.]

Lead Action Plan Summary:

The inspection determined that the building contains lead-based paints. The [intent-stage: draft] Lead Action Plan is attached. Below is a summary of the sections of the plan that address X02.2 b. and page numbers where more detail is located.

Lead Action Plan Summary:

1. 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] 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.

2. 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 areas subject to remediation were first completely emptied of all furniture and the flooring was covered with plastic sheeting. Affected rooms were sealed off from other areas of the building to prevent the spread of lead-containing dust particles and HVAC ducts were sealed. To remove the lead, the remediation team regularly wetted down the walls (to prevent the generation of dust) 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 (including 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.

3. 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 using a specialized coating 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 removed, no re-inspection is required.

4. 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 at scale should indicate which locations are pursuing this feature, and then submit the specific details for the locations selected for an audit.