Residential Lead Paint: Safety During Renovation Projects

What to Know Before you Begin a Renovation Project

- A property owner cannot begin any renovation project that involves deleading work before the residence has been inspected by a licensed inspector.
- An owner (or an owner’s agent) who is trained and authorized can do low-risk and moderate-risk deleading work (see below for details) and must have an authorization number issued by the Childhood Lead Poisoning Prevention Program (CLPPP)).
- Only licensed deleading contractors can do high-risk deleading work.
- The owner must send notifications to CLPPP, the Department of Labor Standards (DLS), the local Board of Health, and to all tenants living in the building at least 10 days prior to any deleading work.
- The residence must be reinspected by a licensed lead inspector after the deleading is completed.

Low-Risk Deleading includes:
- Removing doors, cabinet doors and shutters from hinges;
- Covering surfaces;
- Applying vinyl siding to buildings; and
- Capping baseboards

Moderate-Risk Deleading includes:
- Removing windows, woodwork and other surfaces; and
- Repairing or repainting (making intact) small amounts of lead paint (no more than 2 square feet per interior room or 20 square feet on the exterior).

High-Risk Deleading includes:
- Scraping paint;
- Using chemical paint strippers;
- Demolition; and
- Making large amounts of lead paint intact

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 (29 CFR 1926.62). Major components of this regulation include:

- A permissible exposure limit (PEL) of 50 micrograms of lead per cubic meter of air averaged over an 8-hour period.
• An action level (AL) of 30 micrograms of lead per cubic meter of air averaged over an 8-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 accordance with 29 CFR 1910.134.
• A requirement that employer institutes an information and training program and ensures that all employees subject to exposure to lead at or above the action level participate.
• A requirement that employees exposed to high levels of lead be enrolled in a medical surveillance program.

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.

EH&S (Cambridge Campus)  
46 Blackstone St,  
Cambridge MA, 02139  
617-495-2060  
www.ehs.harvard.edu/buildings-facilities

EH&S (Longwood Campus)  
107 Ave. Louis Pasteur,  
Boston, MA 02115  
617- 432-1720 

Contact the Massachusetts Childhood Lead Poisoning Prevention Program (CLPPP) to get training and authorization for low-risk deleading, to find moderate-risk training course, or to find a licensed lead inspector, risk assessor, or deleading contractor:

CLPPP  
MA Department of Public Health  
250 Washington Street, Seventh Floor  
Boston, MA 02108  
1-800-532-9571 (toll free)  
clppp@state.ma.us  
www.mass.gov/dph/clppp

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

Massachusetts Department of Labor Standards (DLS).  
Lead Program  
Department of Labor and Workplace Development  
19 Staniford St., 2nd floor
FACT SHEET

Standard: Lead Paint
Fact Sheet No. 7

Boston, MA 02114
1-617-626-6960
www.mass.gov/LWD/Labor-standards/lead-program

OSHA Region I
JFK Federal Building,
25 New Sudbury Street, Room E340
Boston, MA 02203
617-565-9860
www.osha.gov/SLTC/lead