



**COMMONWEALTH OF MASSACHUSETTS
EXECUTIVE OFFICE OF LABOR AND WORKFORCE DEVELOPMENT
DEPARTMENT OF LABOR
DIVISION OF OCCUPATIONAL SAFETY**

DELEADER CONTRACTOR INFORMATIONAL BULLETIN

The lead regulations of the Division of Occupational Safety ([454 CMR 22.00](#)) and the [Childhood Lead Poisoning Prevention Program](#) of the Massachusetts Department of Public Health (105 CMR 460.000) classify deleading work into three main categories, based on the potential for lead dust generation: low risk deleading work; moderate risk deleading work and Class I deleading work. It is important to know what category a particular project would fall into, as the associated licensing, training and work practice requirements are different for each class.

What Level of Deleading Is Being Performed?

“Low Risk Deleading” work is work which exclusively consists of the following abatement activities as set forth in 105 CMR 460.175(A): removing doors, cabinets, windows on hinges and shutters, covering surfaces with encapsulants, capping baseboards and removing cabinet doors and shelves which are not glued, nailed or otherwise affixed to supports.

“Moderate Risk Deleading” work is work that has been inspected by a licensed lead inspector pursuant to [454 CMR 22.12\(2\)\(a\)](#), excludes work conducted by demolition, and consisting of one or more of the following activities: the removal and replacement of window components, interior stair components, hand rails, door components, fences, bulkheads, lattices, individual shingles or clapboards from the exterior building sides. Moderate Risk Deleading work also includes the repair or making intact of up to two feet of non-intact lead painted surface per room on interiors and up to ten square feet on building exteriors.

“Class I Deleading” work is deleading work that does not fall into either of the Low Risk or Moderate Risk deleading categories. Typically, Class I deleading work involves scraping or other surface preparation of lead paint in excess of the quantity allowances for Moderate Risk work or demolition of structures covered with lead paint.

Who Should Perform Deleading of Your Home or Facility?

A “Deleading Contractor”, if properly licensed under 454 CMR 22.00, may legally perform all three levels of deleading work. A list of [licensed Deleading Contractors](#) may be accessed by clicking on the “Licensed Deleading Contractors” link on the DOS website at www.mass.gov/dos.

A “Lead Safe Renovator Contractor”, if properly licensed under 454 CMR 22.00, may legally perform Low and Moderate Risk Deleading work, **provided that the supervisor and all workers on the project have taken the Moderate Risk deleading training option specified at 454 CMR 22.08(4)(e) and can produce a training certificate documenting the same.**

The Deleading Contractor or Lead Safe Renovator Contractor is required to produce copies of certifications evidencing that the job supervisor and any workers performing deleading have attended an approved deleading training course. A list of Lead-Safe Renovator-Supervisors who have attended an

approved training course with the Moderate Risk Deleading training option may be accessed by clicking on the “[Lead-Safe Renovator Supervisors Approved for Moderate Risk Deleading](#)” link on the DOS website at www.mass.gov/dos. A list of licensed Lead-Safe Renovation Contractors may be accessed by clicking on the “[Licensed Lead-Safe Renovation Contractors](#)” link on the DOS website at www.mass.gov/dos.

The DOS keeps records of the citation history and license status of Deleading Contractors and Lead-Safe Renovation Contractors. In order to check on the violation history or licensing status of a Deleading Contractor or a Lead-Safe Renovation Contractor, you may call DOS at (617) 626-6960.

How Do I Prepare for Deleading?

You are responsible for packing all your belongings away to avoid contamination. Pay special attention to kitchen items, personal items (toothbrushes e.g.), clothing, curtains and children’s toys. Packing these items in heavy plastic and moving them to another area, such as the attic or basement, should work well. For Class I and Moderate Risk Deleading projects, plan on being out of the unit (nights included) until receiving notice from the lead paint inspector that the unit has passed clearance testing and that it is safe to return.

What Are the Contractor’s Responsibilities?

The contractor is required to submit a written notice of the commencement of deleading activities to the owner of the structure and any tenants ten (10) days prior to commencing deleading work. The contractor is also required to submit this notification to DOS, the Childhood Lead Poisoning Prevention Program of the Massachusetts Department of Public Health and the local Board of Health for the municipality within which the work will be performed. Property owners are urged to verify the preceding with the named agencies.

No one is allowed in the house or apartment while the lead paint is being disturbed in any way. This includes coming back at night. Alternative housing arrangements will need to be made for the time it will take to correct interior lead hazards.

The contractor is required to wait 2 hours for the dust to settle after active deleading before performing the final clean up. The final clean up should consist of vaccuming with a HEPA vacuum, washing or damp-wiping with a high phosphate detergent, followed by a re-vacuuming with the HEPA vacuum.

**THIS BULLETIN IS ISSUED AS A GUIDANCE DOCUMENT ONLY AND IS NOT
INTENDED TO PROVIDE LEGAL ADVICE. QUESTIONS ABOUT THE DELEADING
AND RRP LICENSING LAWS AND REGULATIONS SHOULD BE DIRECTED TO DOS AT
(617) 626-6960 or (617) 969-7177.**

AFFIRMATION OF COMPLIANCE WITH MEDICAL MONITORING REQUIREMENTS

Applicant or Business Name:

Address:

City: State: Zip Code:

I hereby affirm that as a Deleading Contractor and/or Lead-safe Renovation Contractor, I am / my business is in compliance with the medical monitoring requirements prescribed by the Department of Labor Standards (“DLS”) Deleading and Lead-Safe Renovation Regulations, 454 CMR 22.00 (“Lead Regulations”), and relevant OSHA Regulations, [29 CFR 1926.62](#).

My medical monitoring plan includes at least all of the following:

- A Respiratory Protection Program is implemented, in accordance with 29 CFR 1910.134(b) through (d).
- Personal protective clothing and equipment is provided to employees.
- Proper respirator is provided to employees.
- Proper respirator fit testing is performed prior to initial use and at least annually thereafter.
- Records are maintained of the results of all personal exposure monitoring, respirator fit testing, medical examinations and blood lead testing conducted for employees.
- A medical surveillance program is instituted for employees (including blood level/ZPP monitoring; providing physicians with requirements; medical exams).
- A copy of the required sections of the Department’s regulations is provided to the physician conducting the medical examination or consultation under 454 CMR 22.09.
- All medical examinations and procedures are performed by or under the supervision of a licensed physician. All the requirements of a medical examination, as required by 454 CMR 22.09(4)(e), are met.
- Blood lead levels of the applicant or employee and the Reporting Physician’s Statement are provided to the applicant or employee within two working days after receipt.
- Deleader-supervisors and Deleader-workers receive blood lead and zpp monitoring every two months during the first six months following licensure or certification and at least quarterly thereafter.
- No person whose blood lead level is above 50 ug/dl to be permitted to engage in Deleading or Renovation Work until two consecutive blood sampling tests indicate that the blood lead level is at or below 40 ug/dl of whole blood.
- Blood lead samples collected in accordance with the Lead Regulations shall be analyzed by laboratories approved by OSHA-CDC for blood lead analysis.

Signature

Title

Date

Please contact the Department of Labor Standards at 617-626-6960 or visit www.mass.gov/dols, should you have questions about these requirements.