

OVERCOATING SOUND LEAD PAINT

ACTIVITY RAMS — ADAPT TO SITE BEFORE USE

Lead coatings left in place · wet preparation only · hygiene · clean-down and the record of what remains

KD-RA-PA-003 Rev A0

Statutory basis: COSHH 2002 does NOT cover lead — lead in coatings is the Control of Lead at Work Regulations 2002 regs 5, 6 and 10 with ACOP L132 (3rd edition, 2002): assessment, prevention or adequate control of exposure, and medical surveillance where exposure is likely to be significant, with air monitoring as the Regulations and ACOP require. HSE records that lead pigments were not removed from commonly used paints until the early 1980s. MHSWR 1999 reg 16 for new and expectant mothers. Textured coatings and fillers are checked against the asbestos register (CAR 2012). Lead-contaminated waste under the Hazardous Waste (England and Wales) Regulations 2005 and the duty of care in the Environmental Protection Act 1990 s.34 — England and Wales rules; Scotland and Northern Ireland have their own, so confirm them for the site. HSWA 1974 s.3 for occupants, including children. CDM 2015 reg 15 (and reg 13 where a principal contractor is appointed). This document is the recorded safe system of work required by HSWA 1974 s.2(2)(a) and MHSWR 1999 regs 3 and 5.

1 DOCUMENT AND PROJECT IDENTIFICATION

RAMS REFERENCE	PROJECT / SITE REF	SITE NAME AND ADDRESS	DATE PREPARED	NEXT REVIEW DATE
CLIENT / PRINCIPAL CONTRACTOR	PLANNED START	DURATION	OPERATIVES	SUPERVISING THE WORK

2 SCOPE OF WORKS

Preparation and overcoating of existing coatings that are confirmed or presumed to contain lead and are to be left in place: condition check, wet abrading for key, wet scraping of small loose areas, overcoating to encapsulate, daily clean-down, personal hygiene, waste, and the record of where lead remains under the new finish.

This document does not cover: the lead survey and sampling (KD-RAMS-LD-001); any preparation beyond wet abrading for key and local wet scraping, removal or stripping of lead coatings, extensive flaking, and surfaces that are rubbed or struck (KD-RAMS-LD-002); redecoration where coatings are confirmed lead-free (KD-RAMS-PD-002); chemical stripping (KD-RA-PA-004); and textured coatings until the asbestos register confirms them.

SITE-SPECIFIC SCOPE, LOCATIONS AND LIMITATIONS

3 RISK ASSESSMENT — SCORE EACH RISK FOR THIS SITE, THEN ADD WHAT IS MISSING

The hazards and controls below are the starting point for this activity, written by a working main contractor. They are not complete for your site until a competent person has scored each risk, added the site-specific hazards, and struck out anything that does not apply. Rate risks High / Medium / Low before and after controls.

1. Treating a lead coating as lead-free

At risk: Decorators, occupants

Controls: The lead status of each surface comes from the survey (KD-RAMS-LD-001) or a test result for that location. Coatings in buildings painted before the early 1980s with no result are presumed to contain lead. No preparation starts on a surface whose status — tested, or presumed lead — is not recorded: a hold point, not a judgement made on the day.

INITIAL (H/M/L)	RESIDUAL (H/M/L)	SITE-SPECIFIC ADDITIONAL CONTROLS, OR N/A	ACTION OWNER	BY WHEN

2. Lead dust from preparation — breathed in or swallowed

At risk: Decorators, occupants

Controls: Wet methods only: wet abrasive paper or sponges kept wet, and small loose areas scraped wet onto sheeting. No dry sanding, no power sanders, no heat guns, no burning off and no dry scraping. Debris is picked up as it is made with an H-class vacuum and wet wipes, never swept. Where more than small local areas are loose or flaking, work on that surface stops and it is referred to KD-RAMS-LD-002.

INITIAL (H/M/L)	RESIDUAL (H/M/L)	SITE-SPECIFIC ADDITIONAL CONTROLS, OR N/A	ACTION OWNER	BY WHEN

3. Lead taken in from hands, food and cigarettes

At risk: Decorators and their households

Controls: No eating, drinking, smoking or vaping in the work area. Hands and face washed before every break and at the end of the shift, at washing facilities close to the work. Work clothing stays at work and is not taken home to be washed with household laundry. Hand-to-mouth contact is a main route of lead into the body, so hygiene is a primary control.

INITIAL (H/M/L)	RESIDUAL (H/M/L)	SITE-SPECIFIC ADDITIONAL CONTROLS, OR N/A	ACTION OWNER	BY WHEN

4. Build-up of lead in the body over repeated jobs

At risk: Decorators

Controls: The employer's assessment under the Control of Lead at Work Regulations 2002 decides whether exposure is likely to be significant. Where it is, air monitoring is carried out and each worker is under medical surveillance by a doctor appointed for the purpose, with blood-lead results acted on as that doctor directs. The assessment covers new and expectant mothers (MHSWR 1999 reg 16); workers are told lead is a particular risk in pregnancy and while breastfeeding.

INITIAL (H/M/L)	RESIDUAL (H/M/L)	SITE-SPECIFIC ADDITIONAL CONTROLS, OR N/A	ACTION OWNER	BY WHEN

5. Lead dust left behind for occupants — children most at risk

At risk: Occupants, especially children and pregnant women

Controls: Rooms emptied or contents covered and sealed; floors sheeted; occupants, and children in particular, kept out until clean-down is complete. Clean-down every shift: H-class vacuum, wet wipe, fold sheeting inwards and bag it; a clean-off point at the exit. Rooms are released when visibly clean, and where children or pregnant women will re-occupy, only after a clearance wipe test as KD-RAMS-LD-002 describes.

INITIAL (H/M/L)	RESIDUAL (H/M/L)	SITE-SPECIFIC ADDITIONAL CONTROLS, OR N/A	ACTION OWNER	BY WHEN

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6. Overcoating surfaces that are rubbed or struck

At risk: Future occupants

Controls: Encapsulation is not durable where the paint is rubbed or struck. Sash runners and beads, door edges and rebates, and window boards wear through a new coat and release lead dust again. They are not overcoated under this document: they are listed and referred to the client for removal under KD-RAMS-LD-002, enclosure, or replacement.

INITIAL (H/M/L)	RESIDUAL (H/M/L)	SITE-SPECIFIC ADDITIONAL CONTROLS, OR N/A	ACTION OWNER	BY WHEN

7. Disturbing asbestos-containing materials in existing buildings

At risk: Operatives, building occupants

Controls: Check the asbestos register before any intrusive work (CAR 2012). No register, or unclear entries, means stop and refer. If suspect material is found: STOP, withdraw, secure the area and report it — the discovery procedure applies before any further work.

INITIAL (H/M/L)	RESIDUAL (H/M/L)	SITE-SPECIFIC ADDITIONAL CONTROLS, OR N/A	ACTION OWNER	BY WHEN

8. Lead-contaminated waste and wash water

At risk: Decorators, waste handlers, the environment

Controls: Used abrasives, wipes, sheeting, vacuum bags, disposable coveralls and scraped debris are bagged, sealed and labelled at the workplace and consigned as hazardous waste with the consignment note. Wash water from wet abrading is collected and disposed of with the waste — never poured into a sink, drain or gully.

INITIAL (H/M/L)	RESIDUAL (H/M/L)	SITE-SPECIFIC ADDITIONAL CONTROLS, OR N/A	ACTION OWNER	BY WHEN

9. Work at height from steps, podiums, towers or MEWPs

At risk: Operatives, and anyone below

Controls: Select access by the Work at Height hierarchy — podium or tower before steps; MEWPs by trained (IPAF) operators only. Inspect access equipment before use, establish an exclusion below overhead work, and secure tools and materials against dropping.

INITIAL (H/M/L)	RESIDUAL (H/M/L)	SITE-SPECIFIC ADDITIONAL CONTROLS, OR N/A	ACTION OWNER	BY WHEN

Site-specific hazards not listed above — every site has at least one:

HAZARD	WHO IS AT RISK	CONTROLS	INITIAL H/...	RESIDUAL...	ACTION OWNER	BY WHEN

4 METHOD — SEQUENCE OF WORK

- 01 Confirm the recorded lead status of every surface — tested, or presumed lead — and check the asbestos register for textured coatings and fillers; mark the areas up on a drawing.
- 02 Complete the lead assessment; arrange air monitoring and medical surveillance where it finds exposure is likely to be significant; brief the gang on hygiene and the stop rules.
- 03 Agree the programme with the occupier: rooms vacated, contents removed or covered, children and pregnant occupants kept away.
- 04 Set up: sheet floors and fixed contents, sign the area, and place the H-class vacuum, wet wipes, waste bags and a clean-off point at the exit.
- 05 Check each surface. Sound — proceed. Small loose areas — wet scraping. Extensive flaking, or surfaces rubbed or struck — stop and refer to KD-RAMS-LD-002.
- 06 Wet abrade for key only, keeping surface and abrasive wet; wet scrape small loose areas onto the sheeting.
- 07 Collect debris continuously with the H-class vacuum and wet wipes; never sweep or blow down.
- 08 Apply the specified coating system to encapsulate the prepared surfaces.
- 09 Clean down each shift: vacuum, wet wipe, fold sheeting inwards, bag and seal waste; wash hands and face; change out of work clothing. Consign waste and wash water as hazardous waste.
- 10 Before release, carry out the clearance wipe test where children or pregnant women will re-occupy; hand over a record of every location where lead remains under the new coating, for the client's lead register.

SITE-SPECIFIC AMENDMENTS TO THE SEQUENCE

5 PLANT, EQUIPMENT AND MATERIALS

- | | |
|---|--|
| ☐ H-class vacuum | ☐ Wet wipes |
| ☐ Wet abrasive paper and sponges, water sprays | ☐ Washing facilities close to the work |
| ☐ Polythene sheeting and tape | ☐ Podium steps or towers as the access requires |
| ☐ Sealable waste bags and labels | |

INSPECTION / THOROUGH EXAMINATION REFS

COSHH ASSESSMENT REFS

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6 PPE — THE LAST LINE OF CONTROL, NOT THE FIRST

- | | | |
|--|---|--|
| ☐ Head protection | ☐ Eye protection | ☐ Disposable gloves |
| ☐ Safety footwear | ☐ Hearing protection | ☐ Overshoes at the exit |
| ☐ High visibility | ☐ Disposable coveralls kept for the lead area | |
| ☐ Gloves — task-rated | ☐ RPE as the lead assessment selects — face-fit tested | |

RPE TYPE, FACE-FIT STATUS, AND ANY OTHER PPE REQUIRED

7 PERMITS REQUIRED BEFORE THIS WORK STARTS

A permit authorises this work in that place, on that day. It extends the safe system of work in this document — it does not replace it (HSE HSG250). The site issues the permit; record its number before work starts.

KD-PTW-PE-009 — Permit to Enter

For occupied buildings under access control.

PERMIT NUMBER

8 EMERGENCY ARRANGEMENTS — COMPLETE FOR THIS SITE

FIRST AIDER AND LOCATION	NEAREST A&E	ASSEMBLY POINT
HOW THE ALARM IS RAISED	EMERGENCY ACCESS FOR THIS WORK AREA	SPILL / ENVIRONMENTAL RESPONSE

9 BRIEFING RECORD — EVERYONE WORKING UNDER THIS RAMS SIGNS BEFORE STARTING

By signing you confirm the contents of this RAMS have been explained to you, you understand the hazards and controls, and you will work to the sequence stated. Tell the supervisor if the work or the site does not match this document — work stops until it does.

NAME	COMPANY	SIGNATURE	DATE

10 PREPARED AND ACCEPTED

Prepared / adapted for this site by — I confirm I have adapted this document to the site, scored the risks, and that it describes how the work will actually be done.

PRINTED NAME	ROLE / COMPETENCE	COMPANY	SIGNATURE	DATE	TIME

Accepted for the site by — principal contractor or site manager review.

PRINTED NAME	ROLE	COMPANY	SIGNATURE	DATE	TIME

Review this RAMS if the work, the site or the law changes, and at least before each new phase of the works. Flatten the completed PDF before filing so the record cannot be silently edited.

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R REVISION HISTORY

Every revision of this document, and every review that found nothing to change. The revision on the front of this sheet is the one you are holding — check kubitdocs.com for the current one before use.

Rev	Date	Class	What changed	Authorised by
D0	2026-09-11	first-issue	First issue.	— not yet approved —
A0	2026-09-11	review	Approved for issue by the author. Content unchanged from the reviewed draft; the draft status strip is removed. No independent third-party review has been carried out.	Author — director, UK principal contractor, SMSTS. Not an independent review.

Class: first-issue · material (the law, a control, a field or the scope changed — past buyers are notified) · editorial (wording or layout only) · review (checked, nothing changed) · withdrawal. Revision prefix D = draft, not approved and not for sale; A = approved for issue by the person named, on the date shown.