

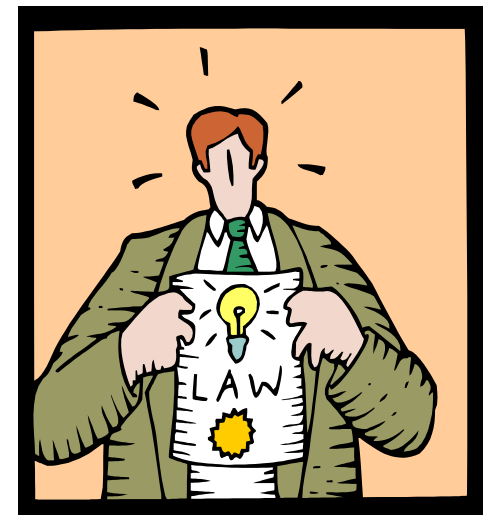
# Lead-Based Paint Renovation, Repair, and Painting

RRP Overview  
July 20, 2010



# The Renovation, Repair, and Painting Rule (RRP)

- On March 31, 2008, EPA issued a final rule under the authority of § 402(c)(3) of the Toxic Substances Control Act (TSCA) to address lead-based paint hazards created by renovation, repair, and painting activities that disturb lead-based paint.
- Effective April 22, 2010
- Delegable program.
- Lawsuit settlement.



# Where does it apply?

- Applies to renovations of:
  - Target housing.
  - Child occupied facilities.
- Excludes:
  - Renovations that affect only components determined to be free of lead-based paint.
  - Activities that disturb under 6 ft<sup>2</sup> interior or 20 ft<sup>2</sup> exterior (this excludes window replacement, demolition, and projects involving prohibited practices).
  - Work done by individuals in housing they own and occupy.

# What does it require?

- Accreditation of training providers.
- Certification of firms, renovators, and dust sampling technicians.
- Work practice standards.
- Changes to 1999 pre-renovation education requirements.



# Pre-Renovation Education Changes

- New brochure “Renovate Right.”
  - “Protect Your Family” brochure is not being retired. It will still be used for real estate disclosure, and general outreach.
- Adds requirements for COF’s, and option for informational signs.



# Work Practice Standards

## Firm Responsibilities

- Ensure all individuals performing renovation activities are appropriately trained.
- A certified renovator is assigned to each renovation.
- All renovations are performed in accordance with the lead-safe work practice standards.
- Comply with pre-renovation education requirements prior to starting the work.
- Ensure the recordkeeping requirements are met.

# Work Practice Standards

## Renovator Responsibilities

- Perform or direct work to ensuring the work practices are followed.
- Be physically present at the work site:
  - When warning signs are posted, while containment is established, and during final work area cleaning.
  - Be available, either on-site or by telephone, at all other times.
- Provide on the job training to uncertified workers.
- When requested, use a test kit to determine if LBP is not present.
- Perform cleaning verification.
- Prepare required records.

# Work Practice Standards

## General

- Post signs defining the work area.
- Certain practices are prohibited:
  - open-flame burning or torching.
  - operating a heat gun above 1100°F.
  - machines that remove lead-based paint through high speed operation such as sanding, grinding, power planing, needle gun, abrasive blasting, or sandblasting, unless used with HEPA exhaust control.
- Ensure that all personnel, tools, and other items including waste are free of dust and debris when leaving the work area.
- Waste must be sealed in bags or plastic sheeting. Dispose of waste in accordance with Federal, State, and Local requirements.



# Work Practice Standards

## Interiors

- Remove or cover all objects from the work area.
- Close and cover all ducts in the work area.
- Close all windows, and cover all doors in the work area.
- Cover the floor surface of the work area with plastic sheeting.

# Work Practice Standards

## Exteriors

- Close all doors and windows within 20 feet of the renovation.
- Cover the ground with plastic sheeting extending out from the edge of the structure a sufficient distance to collect falling paint debris.

# Work Practice Standards

## Cleaning

- Pick up paint chips and debris.
- Remove all protective sheeting.
- Clean all objects and surfaces in and around the work area.
  - Clean walls with a HEPA-equipped vacuum or with a damp cloth.
  - HEPA vacuum all other surfaces and objects in the work area.
  - Mop uncarpeted floors.
  - Wipe all remaining surfaces in the work area with a damp cloth.



# Cleaning Verification

- Wipe floors, countertops, and windowsills with wet cleaning cloth.
- If the cloth does not match the verification card, re-clean that surface and then re-wipe with a wet cleaning cloth.
- If this cloth does not match the cleaning verification card, allow the surface to dry completely and wipe with a dry cleaning cloth.

**Note:** Laboratory dust sampling is an option where the contract or another Federal, State, or local regulation requires dust sampling by a certified professional and requires the renovation firm to clean the work area until it passes clearance.

# Recordkeeping and Enforcement

- Documents demonstrating compliance with the rule must be retained for 3 years following the completion of a renovation.
  - Pamphlet acknowledgment forms, and documentation of work practices and on-the-job training.
- EPA may suspend, revoke, or modify a firm's certification if firm is found to be in non-compliance.
- Non-compliant contractors may be subject to civil and criminal penalties up to \$37,500 for each violation, imprisonment, or both.



# State/Tribal Program Authorization

- RRP is a delegable program.
- Programs must be at least “as protective as” EPA requirements, and have “adequate enforcement.”
- Reciprocity will be encouraged.
- To date 9 states are authorized to administer and enforce an RRP program (Wisconsin, Iowa, North Carolina, Mississippi, Kansas, Rhode Island, Utah, Oregon and Massachusetts).

# RRP Lawsuit Settlement

- EPA recently settled a lawsuit with several public interest groups. In the settlement the Agency agreed to propose:
  - By October 2009 (final rule by April 2010)
    - Elimination of the opt out.
    - The renovator provide post renovation information to the homeowner.
    - These changes were effective on July 6, 2010.
  - By April 2010 (final rule by July 2011)
    - Work area testing, and the elimination of lead hazards when certain tasks are undertaken.
    - NPRM signed April 23, 2010 (published May 6, 2010).
  - Expand the scope of the rule to include public and commercial buildings within the next 6 years.
    - ANPRM signed April 23, 2010 (published May 6, 2010).

# Marketing Campaign for Lead

- People need to know that lead poisoning can happen to them, not just other people. Emphasize that lead poisons children.
- Messages
  - Lead is still a health problem
  - Children can be poisoned by lead dust from improperly conducted renovations
  - Encourage use of certified contractors for renovations

# Outreach Vehicles

## Ad Council

**Create overall awareness of lead hazards and poisoning prevention, including potential renovation hazards**

### General Audiences

General Public  
Pregnant Women  
Renovators  
Renters

## Marketing Firm

**Will take Ad Council message and tailor to specific audiences**

Parents & Do-It-Yourselfers  
African American & Hispanic Communities  
Landlords  
Property Managers  
Hardware Stores, Schools, Daycares  
Healthcare Professionals  
States, Tribes, Federal Government  
Training Firms  
Contractors and Firms

See outreach materials developed at...  
[www.epa.gov/lead/pubs/lscp-press-materials.htm](http://www.epa.gov/lead/pubs/lscp-press-materials.htm)

# Information Resources

## National Lead Information Center (NLIC)

- Contact NLIC with questions, to receive a general information packet, or to order documents.
  - By Phone: call and speak with a specialist Monday through Friday, 8:00 am to 6:00 pm eastern time (except federal holidays) at 1(800) 424-LEAD.
  - On the web at [www.epa.gov/lead/nlic.htm](http://www.epa.gov/lead/nlic.htm)
    - Use the online form to send your comments and questions.
    - Use our online document request to order documents electronically.

# Information Resources

## Lead Website

- [www.epa.gov/lead](http://www.epa.gov/lead) - Main site for information regarding lead and lead hazards.
- [www.epa.gov/getleadsafe](http://www.epa.gov/getleadsafe) - Information specific to the RRP program.
- [www.epa.gov/lead/pubs/lscp-renov-materials.htm](http://www.epa.gov/lead/pubs/lscp-renov-materials.htm) - RRP brochures and materials.
- [http://toxics.custhelp.com/cgi-bin/toxics.cfg/php/enduser/std\\_alp.php](http://toxics.custhelp.com/cgi-bin/toxics.cfg/php/enduser/std_alp.php) - Searchable frequent questions page (currently 271 questions and answers). You can also submit your own questions here.

# Information Resources

## Compliance Guide

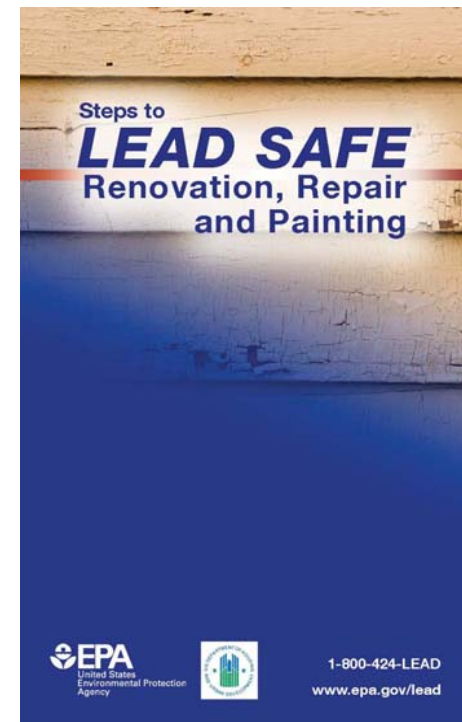
- Handbook for contractors, property managers, and maintenance personnel working in homes, child care facilities, and schools built before 1978.
- Contains detailed information and flow charts outlining the RRP requirements.



# Information Resources

## Steps Brochure

- A guide to lead-safe renovation, repair and painting.
- Covers basic lead-safe practices.
- Can be used as a training guide for on-the-job training.



# Thank You for Your Time!

Mike Wilson

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Office of Chemical Safety and Pollution Prevention  
U.S. Environmental Protection Agency

[www.epa.gov/lead](http://www.epa.gov/lead)