

EPA's Renovation, Repair and Painting Rule:



Will You Be Ready to Comply?

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Basics of RRP Rule:

- **Origin: Title X – Residential Lead-Based Paint Hazard Reduction Act of 1992**
- **Published April 22, 2008 in *Federal Register***
- **Effective and enforceable on April 22, 2010**
- **<http://www.epa.gov/lead/pubs/renovation.htm>**
- **Applies to Renovations for Compensation in:**
 1. **Pre-1978 Target Housing**
 2. **Pre-1978 Child-Occupied Facilities**
- **Trigger:**
 1. **Lead-Based Paint Disturbance (paint, stain, shellac or varnish)**



Basics of RRP Rule (cont.):

- **Legal entities performing renovations for compensation must apply to EPA to become Certified Renovation Firms**
- **Firms' workers must be trained and certified as Renovators by EPA accredited training providers or receive on-the-job training and be supervised by Certified Renovators**

Basics of RRP Rule (cont.):

- **Firms must provide information about LBP to owners and occupants before the work begins**
- **Lead-safe work practices standards must be met during the work**
- **Firms and Certified Renovators must generate and maintain records**

Impacts of RRP Rule:

- **8.4 million renovation events annually**
 - **May drop to 4.4 million events annually**
- **Requires certification of:**
 1. **211,000 Renovation firms by EPA**
 2. **Hundreds of thousands of Renovators by EPA Accredited training providers**
- **Estimated by EPA to add \$35 per job**



“Renovation” Means:

“Modification of any existing structure, or a portion thereof, that results in the disturbance of painted surfaces, unless that activity is performed as part of an abatement.”



“Renovation” Means (cont.):

- **Removing paint, or modifying or repairing painted surfaces or building components**
- **Removal of painted building components**
- **Weatherization projects**
- **Interim controls that disturb painted surfaces**
- **Converting a building, or part of a building, into target housing or a child-occupied facility**



“Compensation” Means:

- Pay for work performed (i.e., to contractors)
- Wages, such as those paid to employees of contractors, building owners, property management companies, child-occupied facility operators, state and local agencies
- Rent for target housing or public or commercial building space
- Excludes:
 1. Child care payments
 2. Do-It-Yourself renovations
 3. Realtor fees



“Target Housing” Means:

- **Housing constructed before 1978**
- **Exceptions:**
 1. **Housing designed for the elderly or persons with disabilities (unless a child less than 6 years of age resides or is expected to reside there)**
 2. **Zero-bedroom dwelling**



“Child-Occupied Facility” Means:

- **Constructed prior to 1978**
- **Visited regularly by the same child, under 6 years of age, on at least two different days within any week, provided:**
 1. **Each day’s visit lasts at least 3 hrs. and combined weekly visits last at least 6 hrs.**
 2. **Combined annual visits last at least 60 hrs.**



Basic Exclusions:

- **Lead Abatement: designed to permanently eliminate LBP hazards**
- **No LBP Disturbed:**
 1. **Written documentation by Certified Lead Risk Assessor or Lead Paint Inspector**
 2. **Proper use of EPA-recognized Test Kit by Certified Renovator**



Minor Repair and Maintenance Exclusion:

- Disturb 6 ft² or less of painted surfaces per room for *interior* activities
- Disturb 20 ft² or less of painted surfaces per side for *exterior* activities
- Not Minor if:
 1. Using restricted work practices
 2. Replacing windows or demolishing painted surface areas



Emergency Renovation (Partial) Exclusion:

- **Sudden, unexpected event that presents an immediate safety or public health hazard and/or that threatens equipment or property with significant damage**
- **Exempt from information distribution, warning signs, containment, waste handling, training and certification requirements**
- **But final cleaning, “cleaning verification” and recordkeeping are still required**

Certified Firm Responsibilities:



- **Apply for certification on/after 10/22/09**
- **Ensure compliance with RRP Rule**
- **Ensure all personnel are Certified Renovators or have received on-the-job training from Certified Renovators**
- **Assign Certified Renovator to all jobs**
- **Meet pre-renovation education and recordkeeping requirements**

Individual Certification:



- **Certified Renovator:**
 1. Take and pass full-day Renovator Initial course from EPA-accredited trainer or
 2. Take and pass half-day Renovator Refresher “bridge” course from EPA-accredited trainer
 3. Take and pass Refresher training every 5 years
- **Certified Dust Sampling Technician**

Certified Renovator Responsibilities:



- **Perform work, direct LSWP**
- **Be physically present while posting warning signs, containing the work area, cleaning the work area**
- **Provide OTJ in LSWP to non-certified workers**
- **Use EPA-recognized test kits to identify lead-based paint before work begins (optional)**

Certified Renovator Responsibilities (cont.):

- **Be available by phone when off-site**
- **Maintain containment**
- **Personally conduct “Cleaning Verification Procedure”**
- **Prepare and maintain job records**



Pre-Renovation Education:

- Provide *Renovate Right* booklet (as of 12/22/08)
- Obtain signed form acknowledging receipt from occupants or proof of mailing or unsuccessful delivery
- Post signage in common areas notifying of intent to perform covered work, and keep copies or pictures of signs and notices



Determining if Lead-Based Paint is Present:

- **Assume LBP *or***
- **Perform paint testing before work begins**
- **Three available testing methods:**
 1. **Paint chip sample collection for lab analysis (Certified Lead Paint Inspectors or Lead Risk Assessors only)**
 2. **X-ray fluorescence testing (Certified Lead Paint Inspectors or Lead Risk Assessors only)**
 3. **EPA-recognized test kits (Certified Renovators)**



Prohibited Practices:



- **Open-flame burning or torching**
- **Using a heat gun above 1,100° F**
- **Power sanding, power grinding, power planing, needle guns, abrasive blasting and sandblasting without shroud and exhaust port connected to HEPA vacuum**

Interior Containment:

- **“Containment” – temporary barriers to isolate work area to avoid escape of dust and debris, and keep occupants out**
 1. Establish work area (Certified Renovator)
 2. Limit access and post signs
 3. Remove or cover belongings with heavy-duty plastic
 4. Cover floors with heavy-duty plastic at least 6 ft. beyond paint disturbance area
 5. Close or cover windows, doors, vents



Exterior Containment:

- **Establish work area (Certified Renovator)**
- **Close windows, doors within 20 ft. of work area**
- **Cover ground at least 10 ft. beyond building perimeter with heavy-duty plastic**
- **Ensure dust and debris do not contaminate or migrate to adjacent areas or properties**

Controlling Dust and Debris During the Work:

- **Work “wet” – sand, scrape, cut, drill**
- **Restrict access to residents if occupied**
- **Clean during the job:**
 - 1. HEPA vacuum horizontal surfaces**
 - 2. Remove debris frequently**
 - 3. Remove paint chips as created**
 - 4. Wrap and dispose of building components**

Cleaning After *Interior* Work:

- Collect chips, debris and seal in heavy-duty plastic bags
- HEPA vacuum, wet mist, fold dirty side inward, and dispose of heavy-duty plastic sheeting in heavy-duty plastic bags
- HEPA vacuum or wet wipe walls, and wipe belongings with damp cloth or disposable wipes
- HEPA vacuum and wet mop uncarpeted floors



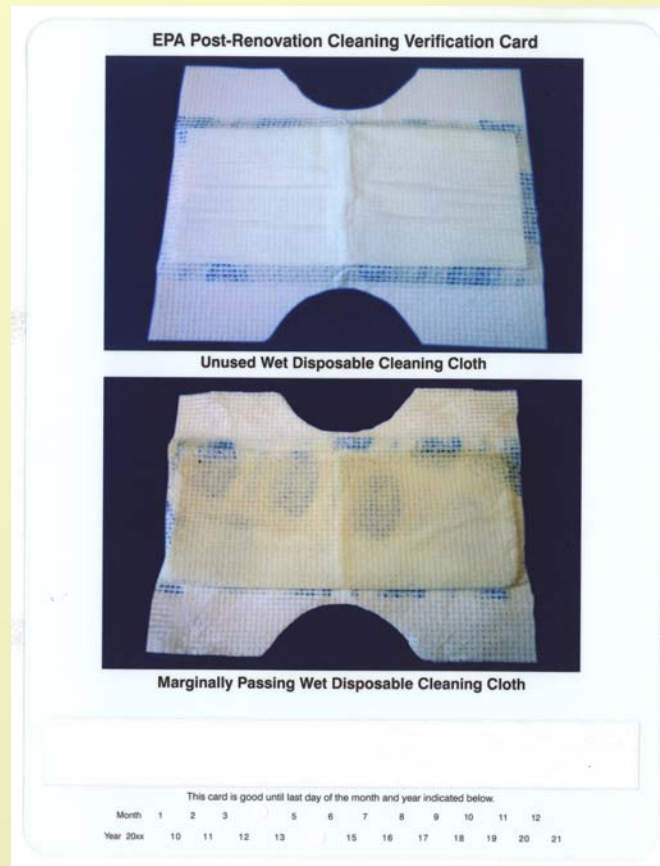
Visual Inspection -- *Interior*:

- **Conducted by Certified Renovator – wear disposable shoe covers before entering work area**
- **No visible dust, debris or residue can remain**
- **Re-clean work area if dust or debris is detected**

EPA “Cleaning Verification Procedure”:

- **Wipe each window sill separately with a wet disposable cleaning cloth**
- **Wipe uncarpeted floors and countertops separately with wet disposable cleaning cloths – up to 40 ft² area per cloth**
- **Compare to EPA-issued Cleaning Verification (CV) card – “white glove”**

EPA “Cleaning Verification Card”:



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EPA “Cleaning Verification Procedure” (cont.):

- **If cloth is darker than the CV card, re-clean and repeat procedure with a new wet disposable cleaning cloth**
- **If second wet cloth fails, wait 1 hr. and then wipe with dry electrostatically-charged disposable cleaning cloth**
- **This completes “Cleaning Verification”**

Cleaning After *Exterior* Work:

- Clean all surfaces in work area until no visible dust, debris, paint chips or residue remains
- Remove dust and debris, and seal in heavy-duty plastic bags
- HEPA vacuum and wet mist heavy-duty plastic sheeting before folding dirty side inward, and sealing in heavy-duty plastic bags

Visual Inspection – *Exterior*:



- **Conducted by the Certified Renovator**
- **No visible dust, debris or residue can remain**
- **Perform final cleaning if any dust or debris is detected on ground or other exterior surfaces**
- **When all areas pass visual inspection, warning signs may be removed**

Post-Work Reporting and Recordkeeping:



- **Certified Renovator name, copy of certification**
- **Certification from Certified Renovator:(1) non-certified worker on-the-job LSWP training, (2) posting warning signs, (3) work area containment, (4) cleaning, (5) “EPA Cleaning Verification,” and (6) proper waste disposal**
- **Description of EPA-recognized test kit used and results (if applicable)**
- **Clearance Examination report (if performed)**

What to Do and Plan for Now:



- **Compliance Strategy**
- **Training Strategy**
- **Certification Strategy**
- **Recordkeeping Strategy**

The CONNOR Institute Can:

- **Train your workers and contractors to become Certified Renovators:**
 1. Full-day Certified Renovator Initial course
 2. Half-day Certified Renovator Refresher “bridge” course
- **Provide further technical assistance on how to comply with the RRP Rule**



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