

IF YOU WORK IN OLDER HOMES THIS WILL AFFECT YOUR BUSINESS!

NEW EPA Requirements for Safe Renovation, Remodeling, and Painting (RRP)

Overview

Common renovation activities that disturb lead-based paint, like sanding, cutting, and demolition, can create hazardous lead dust and chips that can be harmful to adults and children. To protect against exposure risk, the EPA has issued its “Renovate Right” rule, requiring the use of lead-safe work practices during renovations in pre-1978 housing and child-occupied facilities.

As of April 22, 2010, renovators must be certified and follow specific work practices to prevent lead contamination. The rule will affect all renovation/remodeling contractors, general contractors, carpenters, painters, HVAC, plumbers, electricians, and other trades who work and disturb interior or exterior paint in homes built before 1978.

This general summary was prepared using information available as of March 10, 2009. This summary does not cover all rule requirements and exceptions – it is the CONTRACTOR’s responsibility to comply. All information presented here is subject to change, clarification, and additional interpretation.

For More Information Visit

<http://www.epa.gov/lead/pubs/renovation.htm>

What types of structures are covered by the new RRP rule?

- **Target Housing:** Housing (with a few exceptions) constructed prior to 1978.
- **Child-Occupied Facility:** Facilities such as schools and daycares, or a residence in a building constructed prior to 1978 that is visited regularly by the same child under age 6.

What types of renovation are affected?

This rule affects any **work performed for compensation**, including painting and remodeling, that results in the disturbance of painted surfaces in target housing and child-occupied facilities. Some examples include: removal or modification of painted components such as doors; repairing a painted surface or preparing it for repainting by sanding, scraping, burning, or other action that may generate paint dust; siding and gutters; removal of walls, ceilings, and other structures; plaster and drywall; plumbing; weatherization work that disturbs painted surfaces; and window replacement.

What must a renovation professional (*Certified Renovator*) do to prepare to comply?

At least one individual at each company must complete a Certified Renovator training course accredited by the EPA or a state program (likely in Iowa). The new RRP course is **NOT** the same as the HUD Lead Safe Work Practices (LSWP) training. Contractors who have passed the LSWP may qualify to take a “refresher” EPA course. The Certified Renovator has specific responsibilities on each covered job.

What must a *Renovation Firm* do to prepare to comply?

Each company, sole proprietor, or corporation involved in RRP activities (“Renovation Firm”) must be certified and ensure that at least one Certified Renovator is utilized at each job site covered by the rule. Renovation firms may begin applying for certification in October 2009. In other words, each *Renovation Firm* must be certified and have at least one *Certified Renovator* perform certain job site tasks.

*Adapted from a flyer produced by the Alliance for Healthy Homes (<http://www.afhh.org>) and
The National Center for Healthy Housing (<http://www.nchh.org>),
And from information provided by the Environmental Protection Agency (<http://epa.gov>).*

When does the rule go into effect?

Notification rules are already in effect. As of April 22, 2010, all portions of the rule will be in effect (see anticipated timeline below). At that time, all renovation work in target housing and child-occupied facilities must be conducted by certified firms, certified renovators, and workers who have had on the job training in job-specific work practices.

What actions must renovators take for each project in a home or child-occupied facility?

Required notification and renovation activities in pre-1978 structures include but may not be limited to:

- Deliver approved notification to occupants before beginning work (**already required**).
- Place a visible sign defining the work area and warning occupants not to enter it.
- Isolate/contain the work area so that no visible dust or debris leaves the work area.
- Contain, store, and transport renovation waste material safely to prevent release of dust.
- Not use banned practices on painted surfaces such as using a heat gun above 1100°, using a torch, and using machines such as power sander or plane unless attached to a HEPA vacuum.
- After completing work, clean the work area until no visible dust, debris or residue remains.
- After cleaning, conduct post-cleaning verification or pass quantitative dust clearance testing.
- Maintain records to prove compliance with the rule for a period of three years after the completion of renovation.

Are there exceptions or limitations to the requirements?

Some exemptions and limitations to this rule may apply to individual RRP projects. However, it is the contractor’s responsibility to understand these exemptions and limitations so as to comply with the rule (or portions of the rule) when required. The RRP training curriculum covers exemptions and limitations.

Anticipated Deadlines in EPA’s Renovation, Repair and Painting (RRP) Rule

	12/22/2008	4/22/2009	10/22/2009	4/22/2010
“Renovate Right” Pamphlet	New pamphlet must be used			FULL COMPLIANCE WITH ALL RULES
Certified Renovators		Training available (anticipated)		
Renovation Firms			Firms may apply for certification	

Neighborhood Finance Corporation (“NFC”) is providing this notice as a courtesy to contractors and their customers. The information that NFC is providing has been obtained by NFC from other sources. NFC bears no responsibility for the content of the information in this document. Contractors and their customers should independently ascertain their responsibilities related to lead safe practices. For more information about the Environmental Protection Agency’s lead safe practices rules, visit the EPA’s website at <http://www.epa.gov/lead/pubs/renovation.htm> and/or seek independent legal or other representation with respect any lead safe practices or issues that may apply to you or your business.

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