

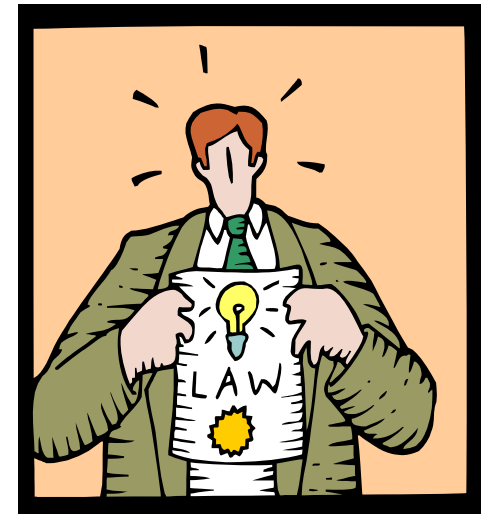
Lead-Based Paint Renovation, Repair, and Painting

RRP Overview
October 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 ft² interior or 20 ft² 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).

Information Resources

Lead Website

- www.epa.gov/lead - Main site for information regarding lead and lead hazards.
- www.epa.gov/getleadsafe - Information specific to the RRP program.
- 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 - Searchable frequent questions page (currently 271 questions and answers). You can also submit your own questions here.

Information Resources

Compliance Guide

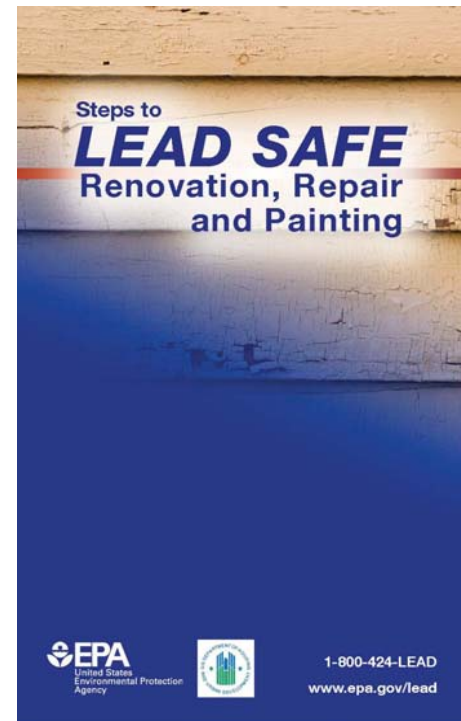
- Handbook for contractors, property managers, and maintenance personnel working in homes, child care facilities, and schools built before 1978.
- Contains detailed information and flow charts outlining the RRP requirements.



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.



Sample Renovation Recordkeeping Checklist

- www.epa.gov/lead/pubs/samplechecklist.pdf

So, How's it Going?

As of September 29, 2010

377 Approved Training Providers

IL-16, IN-2, MI-16

Over 21,800 Courses taught

Over 484,000 Construction & Remodeling

Professionals Certified (est).

IL-20,800, IN-8,350, MI-24,000

Thank You

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