

IMPROVING KIDS' ENVIRONMENT



EPA's Lead-Safe Renovation Rule: What Is It and Does It Apply to Me?

Improving
Kids' 
Environment

**Metro Indianapolis Coalition for
Construction Safety**

May 26, 2010



Outline

- About IKE
- Why do we have new lead-safe work rules?
- What do the rules apply to?
- When it is needed?
- What is required of me and my company?
- What are the cleanup standards?
- Where can I go for more information?



About Improving Kids' Environment

- IKE is a non-profit advocacy organization that works to reduce and remove environmental threats to children's health so they can succeed
- Our mission is to:
 - identify environmental threats to children
 - ensure parents and others have access to accurate information about threats & how to prevent them
 - work with others to remove, reduce and communicate recognized, serious threats





IKE's Priorities

- Eliminating lead poisoning
- Reducing air pollution and other environmental triggers of children's asthma
- Reducing children's exposure to toxic substances





IKE Lead-Safe Homes Fund

- Thanks to Nina Mason Pulliam Charitable Trust and other generous donors, IKE offers grants to help remove lead hazards for low-income homeowners
- Marion County Health Dept.: covers 75% of the cost of lead remediation for low-income property owners
- Requires matching funds from property owner (up to \$2,000)
- IKE provides matching funds when homeowner can't afford to



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Before



After





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Congress Mandated This in 1992

- 1992: Lead Poisoning Prevention Act mandated that the U.S. EPA and HUD take actions to limit the amount of dust created and left during construction at target housing and child-occupied facilities.

- HUD rules went into effect in 2000
- EPA rules first passed in 2008, went into effect in April 2010





Lead Poisoning is Still a Problem

- 1.4% of children screened in Marion County in 2006 had unacceptably high levels of lead in their blood - 40% higher than national average
- Rates higher in some neighborhoods
 - 8-9% of blood tests in Martindale-Brightwood show elevated lead levels



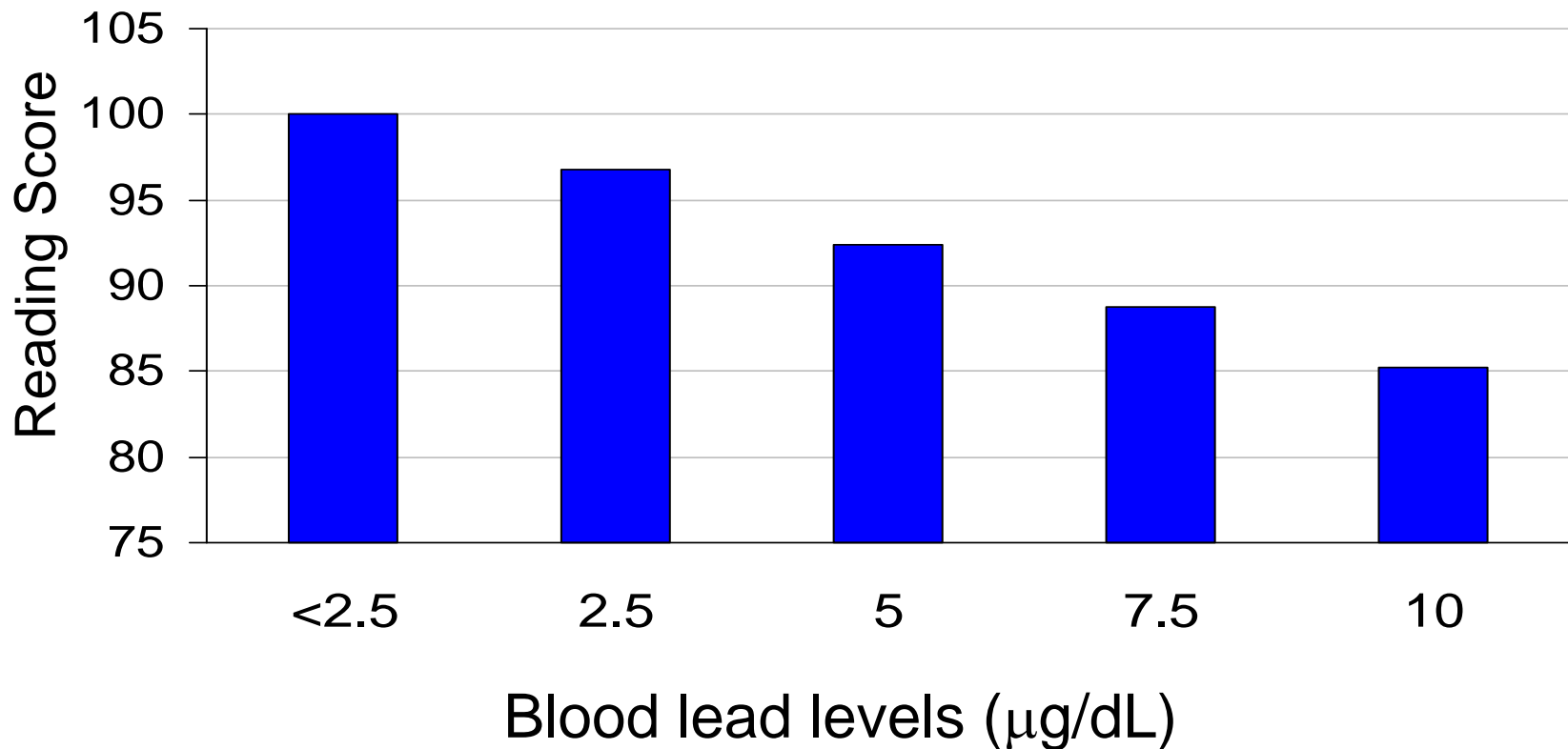


Lead's Impact on School Success

- Even low levels of lead in a child's body can cause:
 - Learning disabilities, attention deficit disorder, and decreased intelligence
 - Speech, language, and behavior problems
 - IQ scores 4-7 points lower than their peers
- No known “safe” level of lead in a child's blood

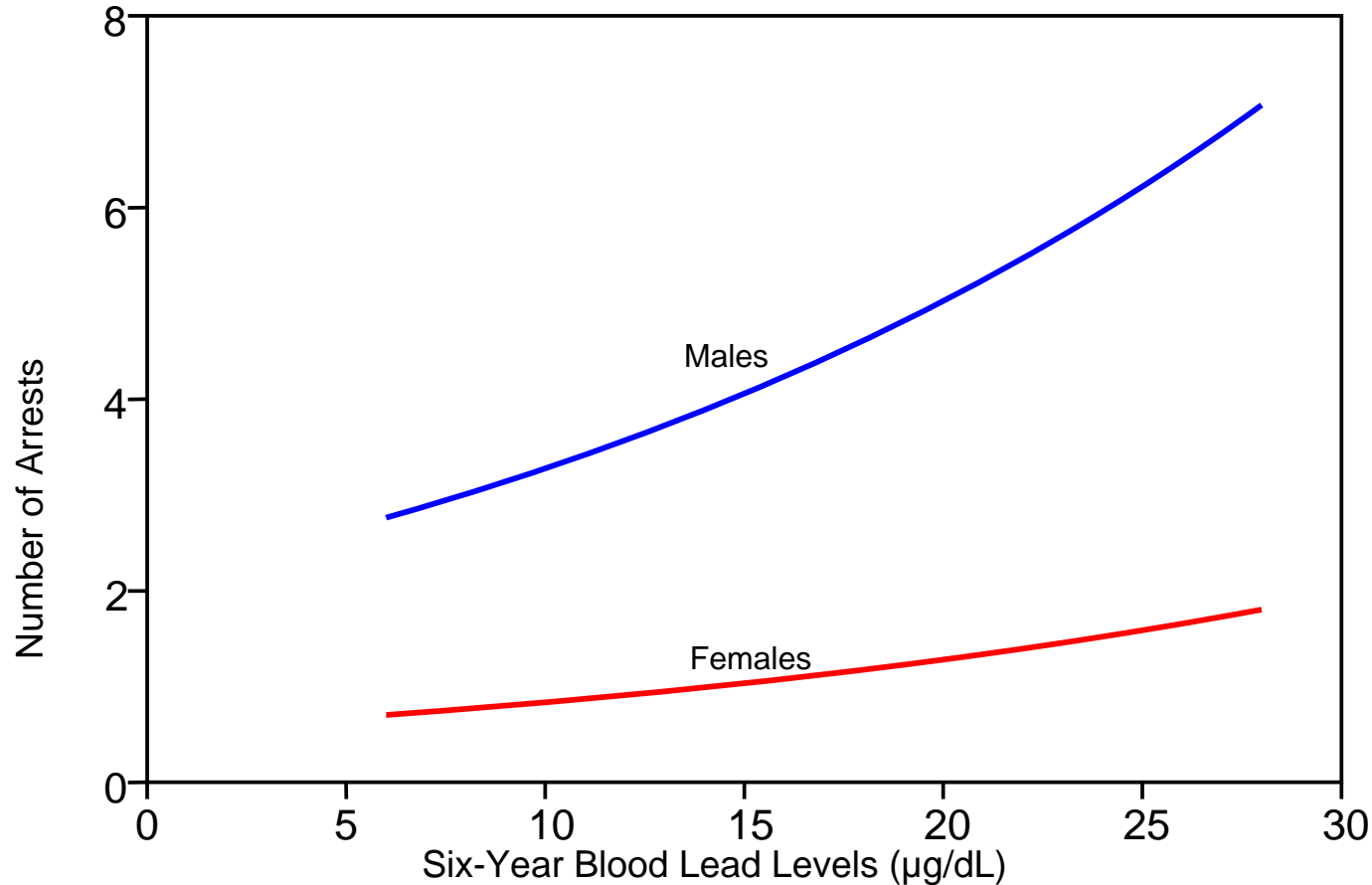


Lead-related Reading Deficits in U.S. Children





Number of Arrests by Childhood Lead Exposure



* Accounting for birthweight, age, prenatal tobacco exposure, maternal age at delivery, maternal IQ, maternal arrest history, HOME Inventory.



Lead Can Also Affect Workers

- Painter's dropsy and plumber's dropsy were once common
- Regular exposure can cause:
 - Kidney failure
 - Anemia
 - Reproductive system impairment (loss of libido)
 - Cancer
- Workers' families can be exposed when lead dust comes home on shoes and clothing



Sources of Lead

- Most common: Peeling or damaged paint in older homes & dust from renovation projects
 - Center Township: More than 90 percent of homes built before 1978
- Lead in jewelry, candy and toys from outside U.S.
- Lead in soil
 - Along roadways
 - Industries
 - Chipping paint





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The rules apply if your firm...

- Offers to perform or intends to perform renovations, repair or painting in pre-1978 housing, preschools, daycare centers or other child-occupied facilities
 - Renovators
 - Painters
 - Electricians
 - HVAC
 - Window & door replacement firms
 - Home entertainment system installers
 - And others...





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The rules apply if your job...

- Is in a pre-1978 home or “child-occupied facility”
 - All pre-1978 homes
 - A child-occupied facility is a building, or portion of a building, constructed prior to 1978, visited regularly by the same child, under 6 years of age
 - Includes day care centers, preschools, and kindergarten classrooms, restrooms and cafeterias
- Disturbs more than 6 square ft. of painted surface per room inside, or 20 square ft. outside
- Involves window replacement or demolition, regardless of surface disturbed



Penalties

- Potential EPA fines up to \$37,500 for each violation on each job
- Insurance companies expect you to comply for policy renewal
- Your clients or other groups could sue to force compliance if EPA does not act





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All Work Must Be Conducted...

- Under the supervision of a Certified Lead Renovator (CLR);
- With workers trained either as CLRs or trained in lead-safe work practices by a CLR;
- By firms licensed as Certified Renovation Firms;
- Using lead-safe work practices, and
- With verification that the site is properly cleaned up.
 - The renovator is required to warn the owner/occupants of the hazards of renovation disturbing LBP and to keep extensive records.



A Certified Lead Renovator is...

- An individual
- Instructed in an EPA-approved training curriculum





A Certified Renovation Firm is...

- A company
- Certification is issued by the EPA
- To become certified, a firm must file an EPA application form, pay a processing fee (\$300 for most firms), and verify it will comply with EPA laws including using a certified renovator to supervise the work
- A self-employed individual can be a Certified Renovation Firm





Who needs to be trained & certified?

- Firm needs certification
- Each job must be set up and supervised by a Certified Lead Renovator
- Workers need to be trained by Certified Lead Renovator





What are Lead-Safe Work Practices?

- **Contractors must use lead-safe work practices and follow these three procedures:**
 - Contain the work area
 - Minimize dust
 - Clean up thoroughly



Contain Work Area

- Firms must post signs clearly defining the work area and warning occupants and other persons to remain outside of the work area.
- Signs should be in the language of the occupants.
- Prior to the renovation, the firm must contain the work area so that no dust or debris leaves the work area while the renovation is being performed.



Minimize Dust

- Allowable work practices are designed to prevent dust
- These are prohibited during a renovation:
 - Open-flame burning or torching of lead-based paint;
 - Use of machines that remove lead-based paint through high speed operation such as sanding, grinding, power planing, needle gun, abrasive blasting, or sandblasting, unless such machines are used with HEPA exhaust control; and
 - Operating a heat gun on lead-based paint at temperatures of 1100 degrees Fahrenheit or higher.



Clean Up Thoroughly

- Waste from renovation activities must be contained to prevent releases of dust and debris before the waste is removed from the work area for storage or disposal.
- All objects and surfaces in the work area must be cleaned using specific methods (wiping with wet disposable cloths, etc.)
- Cleaning verification required



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Cleanup Standards

- Visual inspection and...
- Cleaning verification (by a certified renovator)
 - or
- Dust clearance exam (by certified inspector, assessor or technician)



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Useful websites

- EPA RRP Home Page:

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

- EPA List of Certified Renovators:

http://cfpub.epa.gov/flpp/searchrrp_firm.htm

- EPA List of Course Providers:

http://cfpub.epa.gov/flpp/searchrrp_training.htm

- Environmental Management Institute: <http://www.EnvMgt.org>



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