

# **Lead-Based Paint Renovation, Repair, and Painting Rule 40 CFR 745**

## **Overview October 2010**

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US EPA REGION ONE



# Renovation, Repair and Painting

## Overview of Presentation:

**RENOVATION REPAIR PAINTING -**  
**INTRODUCTION**

**RENOVATION REPAIR PAINTING -**  
**RULE SCOPE**  
**CERTIFICATION/ACCREDITATION**  
**WORK PRACTICE STANDARDS**  
**INFORMATION RESOURCES**

# What is a Renovation?

- A renovation is a modification of any existing structure, or portion thereof, that results in the disturbance of painted surfaces, unless that activity is performed as part of an abatement. This includes:
  - Modification or repair of painted surfaces such as doors, surface restoration, window repair, or surface preparation activity (sanding, scraping).
  - Removal of building components, such as walls, ceilings, plumbing, or windows.
  - Weatherization projects, such as cutting holes in painted surfaces to install blown-in insulation or to gain access to attics or planing thresholds to install weather-stripping.
  - Interim controls that disturb painted surfaces, such as paint stabilization.
- Renovations that convert a building, or part of a building, into target housing or a child-occupied facility are covered.

## Rule Scope

Where:

### IT APPLIES:

- Pre 1978 Housing (Target Housing)
- Child Occupied Facilities, Day Cares, Schools (Children Under 6)

### IT DOESN'T APPLY:

- Zero Bedroom Dwellings (dorms, studio)
- Homes for the Elderly

## Rule Scope

When: A Painted Surface

Pre 1978 Housing and Child Occupied Facilities

### APPLIES:

INTERIOR: Greater Than 6 Square Feet per  
room/30 day period (40CFR745.83)

EXTERIOR: Greater Than 20 Square Feet

ALL Window Replacement Activities

## Rule Scope

What does it require?

- Pre-renovation Notification: “Renovate Right”
- Accreditation of training providers.

**April 2009 - Ongoing.**

- Certification of firms, renovators\*, and dust sampling technicians.

**October 2009 – Ongoing.**

\*Delayed till October 1, 2010- must be registered by 12/31/2010

- Work practice standards .

**Effective April 22, 2010.**

## Rule Scope

- Homeowners may choose to opt out of the rule's requirements if
  - They occupy the housing to be renovated
  - The housing is not a child-occupied facility and
  - No child under age 6 or pregnant woman resides there.

## Rule Scope

### Exclusions

- Renovations affecting only components that are free of lead-based paint
  - Regulation allows renovators to use EPA approved commercial Test Kits to determine if lead-based paint is present before a job begins.
- Minor repair and maintenance.
- Emergency Renovations.
- Renovations performed by homeowners in their own homes.



## Rule Scope

### Minor Repair and Maintenance Activities

- For the purposes of this rule, renovations do not include minor repair and maintenance activities.
- Minor repair and maintenance activities are activities, including minor heating, ventilation or air conditioning work, electrical work, and plumbing, that disrupt 6 square feet or less of painted surface per room for interior activities or 20 square feet or less of painted surface for exterior activities.
  - No prohibited practices.
  - No window replacements.
  - No demolition of painted surfaces.

## Rule Scope

### Minor Repair and Maintenance Activities

- When removing painted components, or portions of painted components, the entire surface area removed is the amount of painted surface disturbed.
- Jobs, other than emergency renovations, performed in the same room within the same 30 days are considered the same job.

# Rule Scope

## Emergency renovations

- Emergency renovations are renovation activities that were not planned but result from a sudden, unexpected event that, if not immediately attended to, presents a safety or public health hazard, or threatens equipment and/or property with significant damage.
- Emergency renovations are exempt from the rule's requirements to the extent necessary to respond to the emergency.
  - Not required to provide pamphlet to owner/occupant.
  - Post-renovation cleaning and cleaning verification must be performed by certified firms and individuals in accordance with the rule requirements.

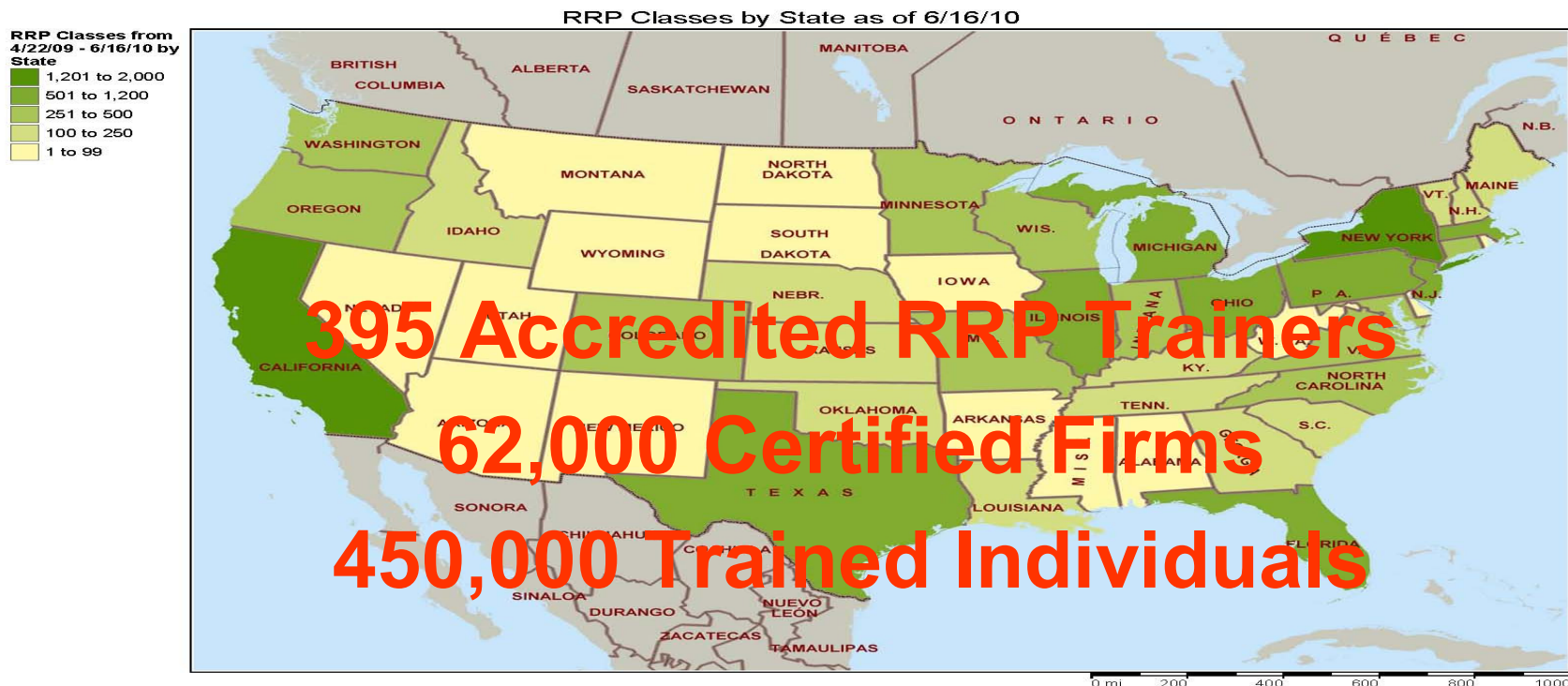
# CERTIFICATION - ACCREDITATION

## 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).

# CERTIFICATION - ACCREDITATION

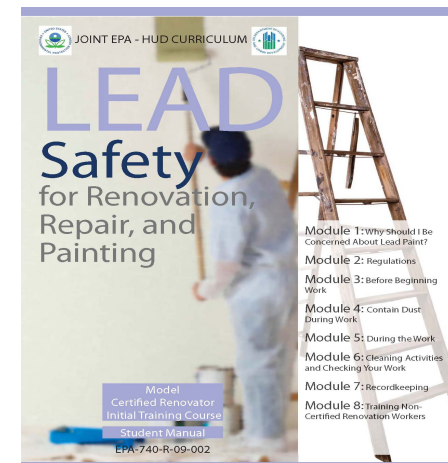
## EPA Overview



# CERTIFICATION - ACCREDITATION

## Training Providers

- Trainers must be accredited to provide renovator or sampling technician training, to become accredited they must submit an application and fee to EPA.
- Must be re-accredited every 4 years.
- EPA developed model renovation training.
- Training providers must notify EPA of individuals who complete training.



# CERTIFICATION - ACCREDITATION

## Certification of Firms

If you or your employees conduct renovation or repair activities in a pre-1978 residential building or child-occupied facility:

STEP 1: Submit an application and fee to EPA

STEP 2: Make sure your employees are trained in Lead-Safe Work Practices.

STEP 3: Once you receive your EPA Lead-Safe Firm Certification in the mail and logo instructions in your e-mail, update any desired outreach materials.



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# 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

## 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

## 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.



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# 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.



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# 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 remaining surfaces and objects in the work area.
  - Wipe all remaining surfaces in the work area with a damp cloth.
  - Mop uncarpeted floors.





# Work Practice Standards

## 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.



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OVERVIEW



# Work Practice Standards

## Recordkeeping - Pre-Renovation Education

### Renovations in common areas

- ≤ 60 days before renovation

FIRM gives **owner** pamphlet and gets written acknowledgement OR gets certificate of mailing 7 days >start

### AND FIRM Notifies each affected unit

- Written notice to each unit OR post informational signs
- Post pamphlet (or how to obtain a copy)

FIRM prepares written statement describing steps taken  
Notify if revisions to scope, location and/or dates



# Work Practice Standards

## Recordkeeping – Training Certifications

- Documents demonstrating compliance with the rule must be retained for 3 years following the completion of a renovation.
  - Pamphlet acknowledgment forms, documentation of work practices, checklists, 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.





# Information Resources

## Compliance Guide

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



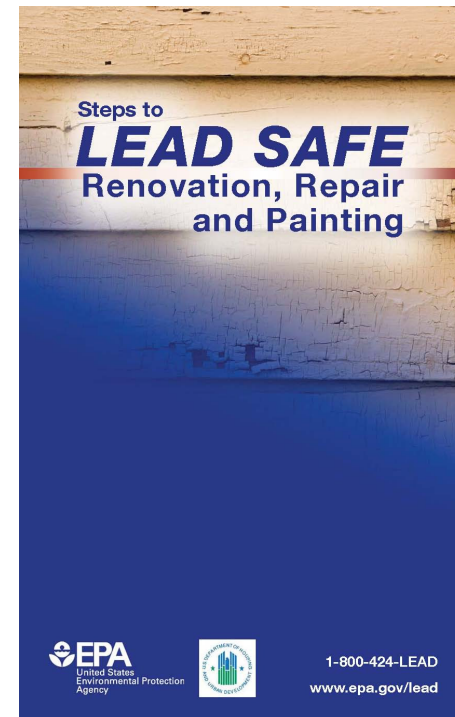
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# Information Resources

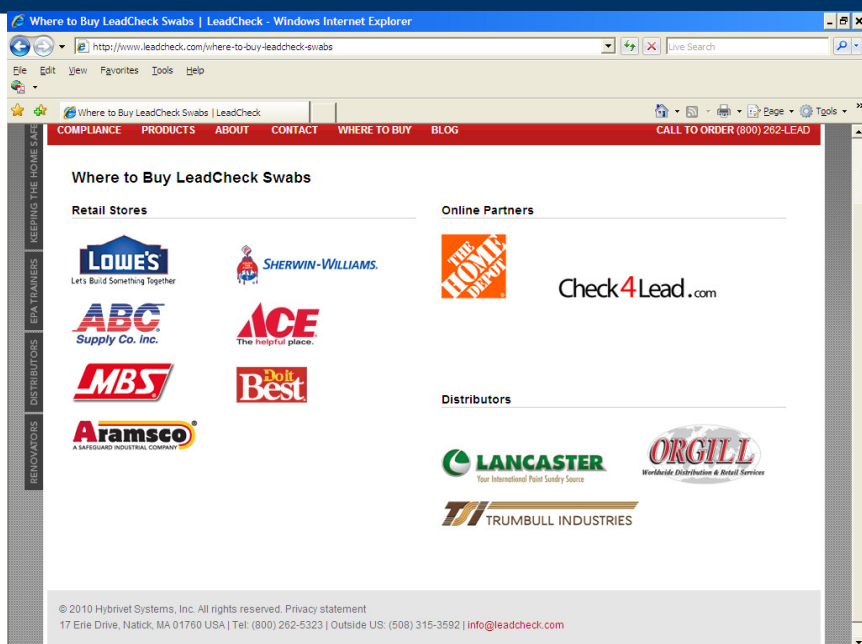
## Steps Brochure


- 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.




# Information Resources

## Test Kits



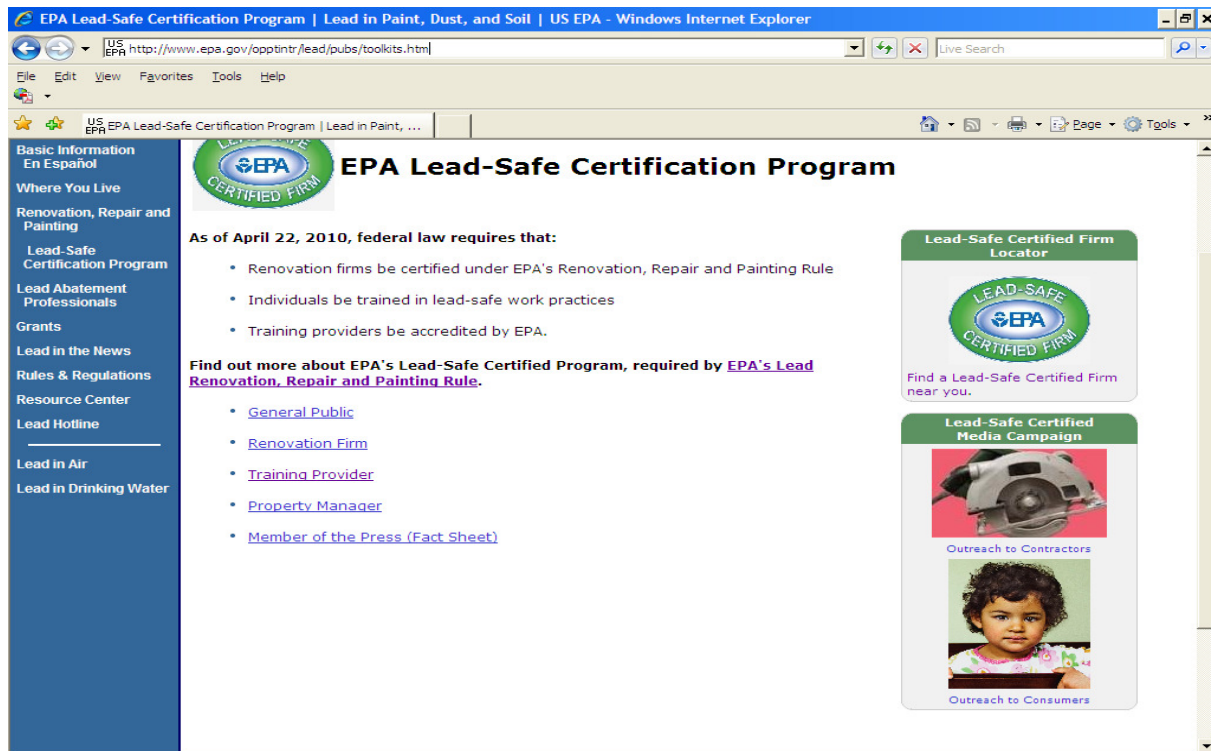
 **PROFESSIONAL**  
**D-LEAD PAINT TEST KIT**

The only test for lead in paint that is  
EPA Recognized and ETV Tested for use on  
PLASTER, DRYWALL, WOOD and METAL Surfaces.



# Information Resources - Web Links

## Get Lead Safe - <http://www.epa.gov/getleadsafe>

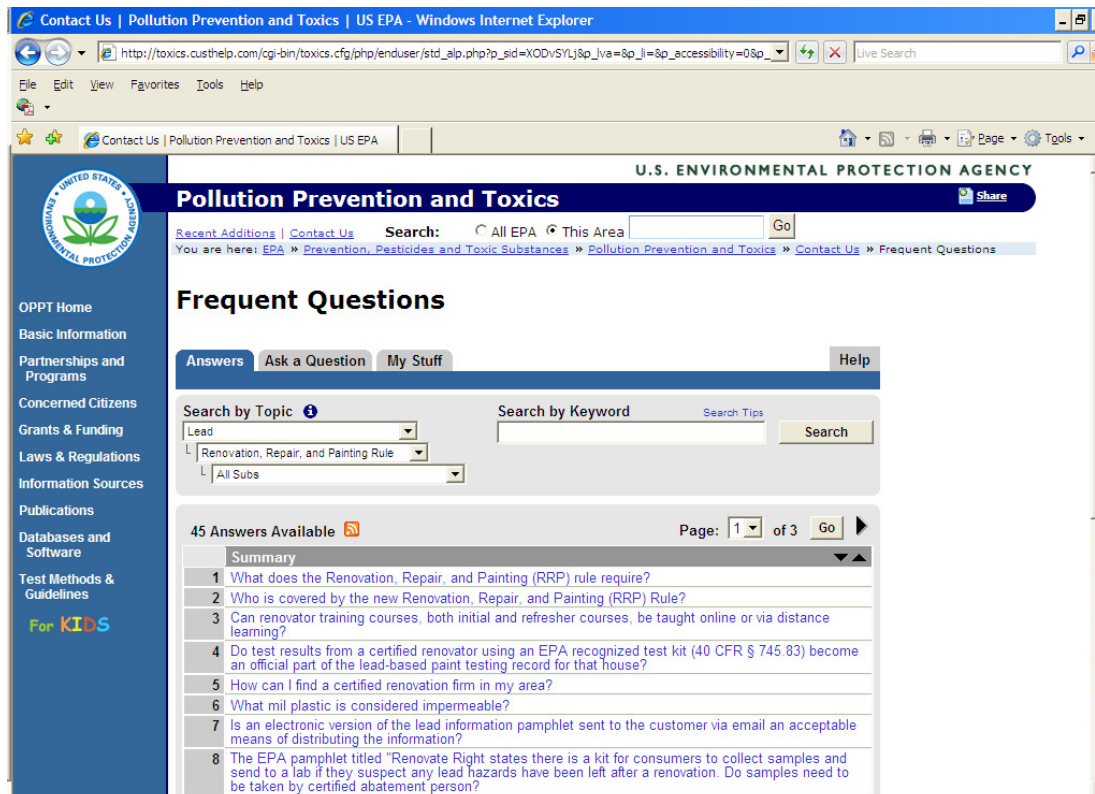


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# Information Resources - Web Links

## FAQ's - <http://toxics.custhelp.com>



The screenshot shows the EPA's Pollution Prevention and Toxics website. The page title is "Pollution Prevention and Toxics". The left sidebar contains links for OPPT Home, Basic Information, Partnerships and Programs, Concerned Citizens, Grants & Funding, Laws & Regulations, Information Sources, Publications, Databases and Software, Test Methods & Guidelines, and For KIDS. The main content area is titled "Frequent Questions" and includes a search bar, a "Search by Topic" dropdown menu (set to "Lead"), and a "Search by Keyword" field. Below the search bar, it indicates "45 Answers Available" and shows a list of questions and answers. The questions are numbered 1 through 8, covering topics such as RRP rule requirements, covered parties, training courses, test results, certified renovation firms, impermeable plastic, electronic versions of pamphlets, and EPA pamphlets.

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### Pollution Prevention and Toxics

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**Search by Topic**  **Search by Keyword**

**45 Answers Available**  **Page:**   **of 3**

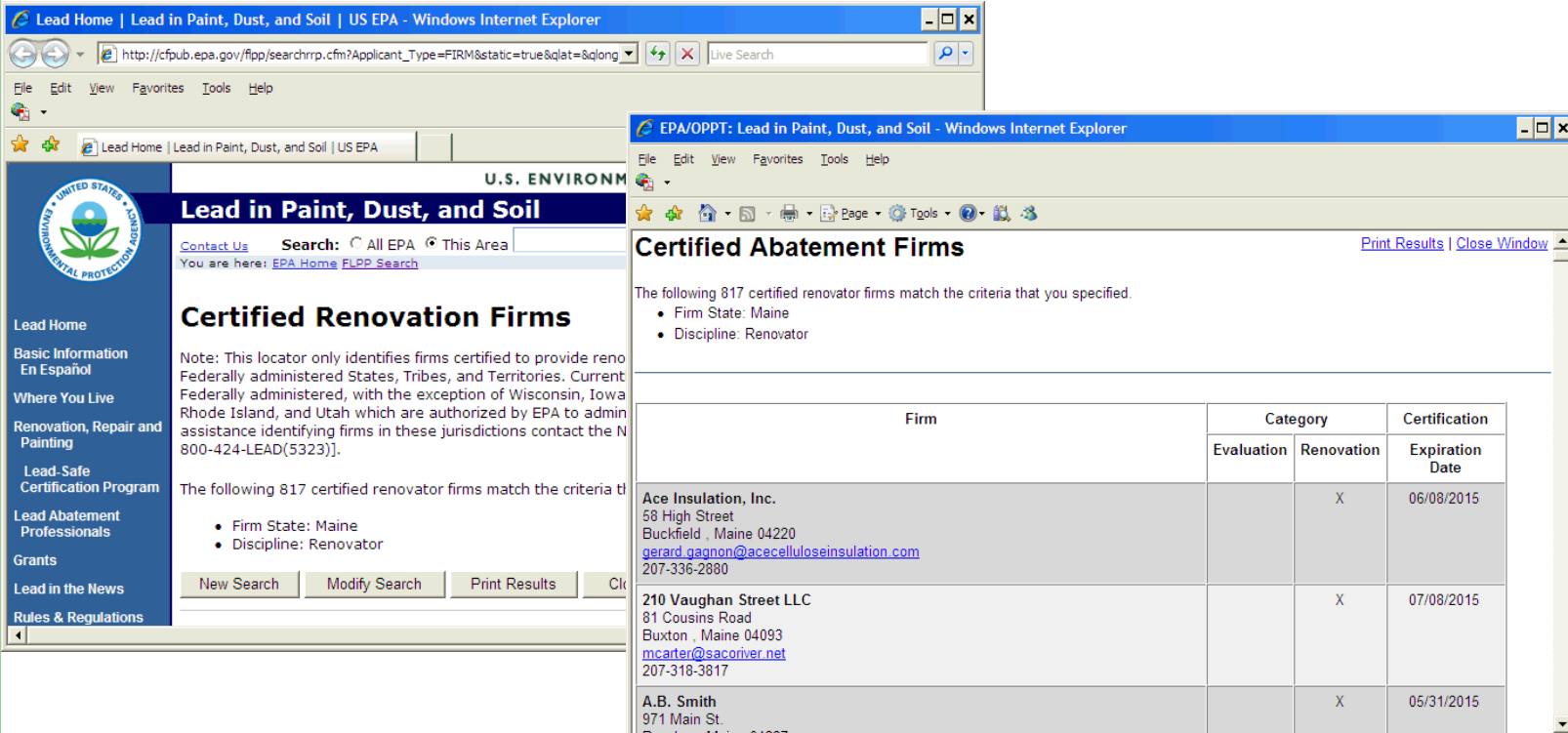
Summary
1 What does the Renovation, Repair, and Painting (RRP) rule require?
2 Who is covered by the new Renovation, Repair, and Painting (RRP) Rule?
3 Can renovator training courses, both initial and refresher courses, be taught online or via distance learning?
4 Do test results from a certified renovator using an EPA recognized test kit (40 CFR § 745.83) become an official part of the lead-based paint testing record for that house?
5 How can I find a certified renovation firm in my area?
6 What mil plastic is considered impermeable?
7 Is an electronic version of the lead information pamphlet sent to the customer via email an acceptable means of distributing the information?
8 The EPA pamphlet titled "Renovate Right" states there is a kit for consumers to collect samples and send to a lab if they suspect any lead hazards have been left after a renovation. Do samples need to be taken by certified abatement person?

## RRP FEDERAL FACILITIES OVERVIEW

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# Information Resources - Web Links

## FIRMS - [http://cfpub.epa.gov/flpp/searchrrp\\_firm.htm](http://cfpub.epa.gov/flpp/searchrrp_firm.htm)



The screenshot shows two overlapping browser windows. The background window is the EPA 'Lead in Paint, Dust, and Soil' homepage. The foreground window shows the search results for 'Certified Abatement Firms' in Maine.

**U.S. ENVIRONMENTAL PROTECTION AGENCY**  
**Lead in Paint, Dust, and Soil**

**Certified Renovation Firms**

Note: This locator only identifies firms certified to provide renovation services in Federally administered States, Tribes, and Territories. Current Federally administered, with the exception of Wisconsin, Iowa, Rhode Island, and Utah which are authorized by EPA to administer assistance identifying firms in these jurisdictions contact the N 800-424-LEAD(5323).

The following 817 certified renovator firms match the criteria that you specified.

- Firm State: Maine
- Discipline: Renovator

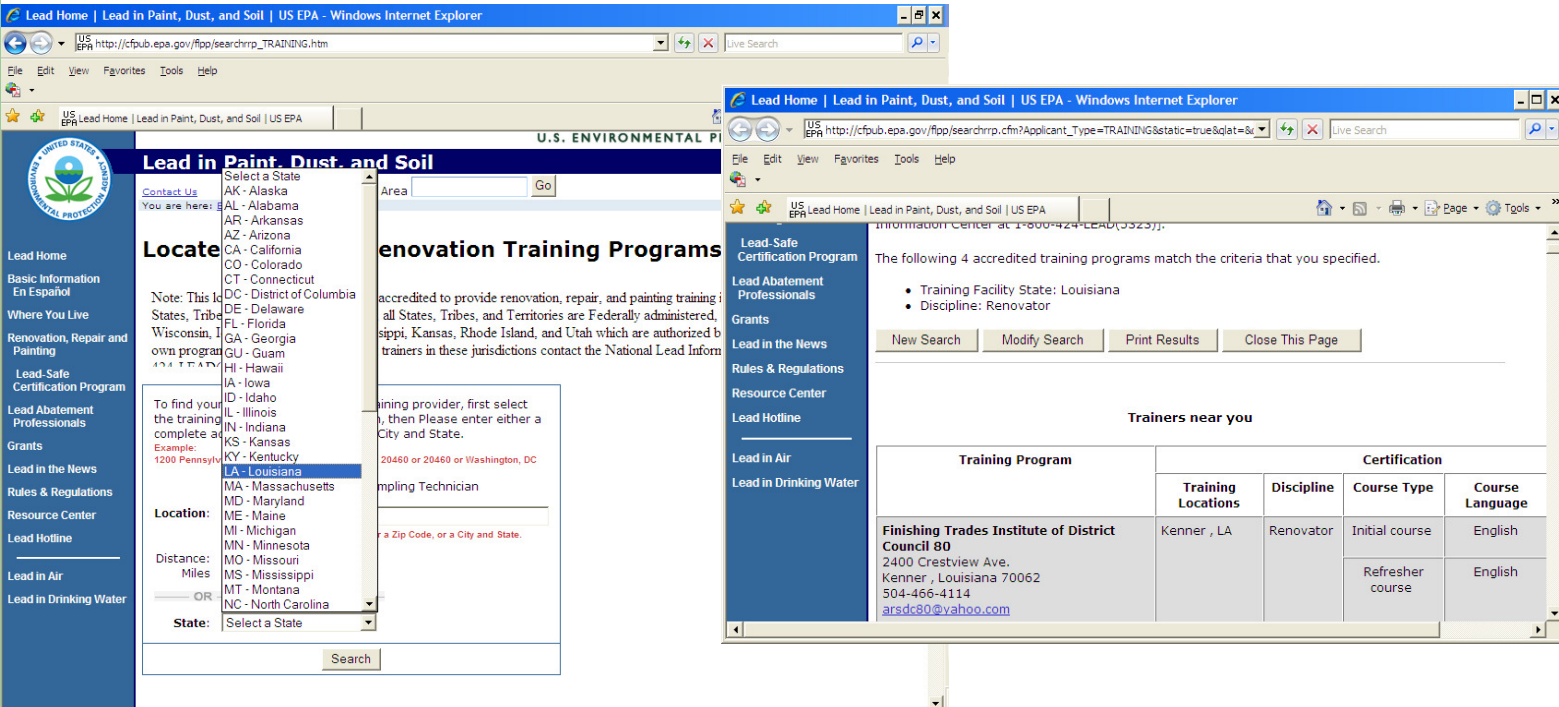
Firm	Category		Certification Expiration Date
	Evaluation	Renovation	
<b>Ace Insulation, Inc.</b> 58 High Street Buckfield, Maine 04220 <a href="mailto:gerard.gagnon@acecelluloseinsulation.com">gerard.gagnon@acecelluloseinsulation.com</a> 207-336-2880		X	06/08/2015
<b>210 Vaughan Street LLC</b> 81 Cousins Road Buxton, Maine 04093 <a href="mailto:mcarter@sacriver.net">mcarter@sacriver.net</a> 207-318-3817		X	07/08/2015
<b>A.B. Smith</b> 971 Main St.		X	05/31/2015



# Information Resources - Web Links

## TRAINERS -

[http://cfpub.epa.gov/flpp/searchrrp\\_TRAINING.htm](http://cfpub.epa.gov/flpp/searchrrp_TRAINING.htm)



The screenshot shows two overlapping browser windows from the EPA website. The left window displays the 'Locate' section with a dropdown menu for selecting a state. The right window shows the search results for training programs, listing 4 accredited programs that match the criteria: Training Facility State: Louisiana and Discipline: Renovator.

**Trainers near you**

Training Program	Training Locations	Discipline	Certification	
			Course Type	Course Language
Finishing Trades Institute of District Council 80 2400 Crestview Ave. Kenner, Louisiana 70062 504-466-4114 <a href="mailto:arsdc80@yahoo.com">arsdc80@yahoo.com</a>	Kenner, LA	Renovator	Initial course	English
			Refresher course	English

## Information Resources

### Websites -



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

**NEW EPA RULE:  
ALL CONTRACTORS  
NEED TO GET  
LEAD-SAFE CERTIFIED.**



**FIND AN ACCREDITED  
TRAINER NEAR YOU »**





# Information Resources

## Your EPA RRP Contacts -

<http://www.epa.gov/lead/pubs/leadoff1.htm>



Where You Live | Lead in Paint, Dust, and Soil | US EPA - Windows Internet Explorer

US EPA Where You Live | Lead in Paint, Dust, and Soil | US EPA

You are here: [EPA Home](#) » [Chemical Safety & Pollution Prevention](#) » [Pollution Prevention & Toxics](#) » [Lead in Paint, Dust, and Soil](#) » [Where You Live](#)

### Where You Live

EPA maintains ten Regional Offices to implement federal environmental programs around the country. These Regional Offices cooperate with federal, state, interstate, and local agencies, as well as with industry, academic institutions, and other private groups, to ensure that their Region's needs are addressed and that federal environmental laws are upheld. Within each Region, the Regional Administrator has designated Regional Lead Coordinators to oversee the development of lead-poisoning prevention efforts within the Region. The information contacts for these offices are listed below.

Click on an area of the map below for information about the EPA Regional Office serving that area. [TEXT ALTERNATIVE.](#)



Also, for detailed information or questions, you can call the [National Lead Information Center \(NLIC\)](#) and speak with an information specialist Monday through Friday, 8:00 am to 6:00 pm eastern time at **1(800) 424-LEAD.**

**NEW EPA RULE:  
ALL CONTRACTORS  
NEED TO GET  
LEAD-SAFE CERTIFIED.**



**FIND AN ACCREDITED  
TRAINER NEAR YOU »**

