

US Environmental
Protection
Agency's
Renovation,
Repair & Painting
(RRP) Rule at a
Glance



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About the RRP:

On March 31st, 2008, the US EPA issued a new rule requiring lead safe work practices to reduce exposure to lead hazards created by renovation, repair and painting (RRP) activities that disturb lead-based paint. The rule will address hazards created by renovation, repair and painting activities that disturb lead-based paint in "target housing" and "child-occupied facilities". The RRP rule will establish requirements for training renovators and dust sampling technicians; certifying renovators, dust sampling technicians, and renovation firms; accrediting providers of renovation and dust sampling technician training; and for renovation work practices. This rule will be enforceable in April 2010.

The RRP in Brief:

To Whom and Where does the RRP Rule apply?

The rule applies to renovations, remodeling, painting, window replacement, plumbing, electrical work, heating and air-conditioning, demolition, and jobs performed for compensation in target housing and child-occupied facilities built before January 1, 1978, and where more than 6 square feet of paint per room or 20 square feet outside will be disturbed by someone being compensated for their work; including rental property, schools and day care providers.

What does the RRP Rule require?

Contractors must give clients a pamphlet called "Renovate Right" and get a signed receipt before beginning a job. At least one RRP Certified Renovator is required at each job site. Contractors need to sign up for an EPA Accredited RRP class. Lead Abatement Supervisors and Workers who are already state certified also have to become RRP certified, but they only need to take a 1/2 day "refresher" class. In addition to individual certification, each firm, agency or non-profit must also become RRP certified. Lead Abatement firms will also have to become Certified RRP Firms if they ever do non-abatement jobs. A copy of a lead training certificate must be provided to clients. RRP Certified Renovators must train all non-certified people at the job site. Contractors who wish to do business with cities/counties receiving Federal money for housing rehabilitation must have everyone trained in the classroom. The rule requires contractors to either test all the paint they will disturb BEFORE beginning a job, or assume that it is lead-based. At the end of each job, contractors are required to do a "cleaning verification" to make sure they cleaned up properly.

EPA accredited RRP training providers: <http://www.epa.gov/lead/pubs/trainingproviders.htm>

EPA publications the contractor will need: <http://www.epa.gov/lead/pubs/toolkits.htm>

The National Center for Healthy Housing training schedule:
<http://www.nchh.org/Training/Calendar.aspx>

The Alliance for Healthy Homes train-the-trainer program:
http://www.afhh.org/res/res_training_RRP_train_the_trainer.htm

Information acquired from <http://www.homesafetraining.com/rrp.html#whom>.

Does the RRP rule apply to Rebuilding Together Affiliates?

Technically, Rebuilding Together and other nonprofit organizations providing uncompensated services are exempt from the rule. However, since our organization's shared vision is "a safe and healthy home for every person," Rebuilding Together cannot ignore the health and safety issues being addressed by the RRP rule. EPA states in their Lead-Based Paint Pre-Renovation Education Rule:

Some non-profit organizations have mission statements which include ensuring the safety of low-income families with children, this directly corresponds with the spirit of the lead rule. Non-profit organizations who perform work on target housing for not cost could increase the safety of the volunteers and the occupants by distributing the lead education pamphlet [Renovate Right] at little to no burden. EPA will provide as many pamphlets as possible at no cost to the organization where appropriate and as needed.

Rebuilding Together affiliates can order, for free, large quantities of publications from the National Lead Information Center (1-800-424-LEAD). Publications available include (check with NLIC for languages available):

- Renovate Right
- Help Yourself to a Healthy Home
- Lead in Your Home: A Parent's Reference Guide
- Volunteers Opening Doors: The Five Keys to Lead Safety
- Lead Paint Safety: A Field Guide for Paint, Home Maintenance, and Renovation Work

There are many more publications available—visit <http://www.epa.gov/lead/pubs/nlicdocs.htm> for a full listing, or contact NLIC to speak with a representative who can help you find what you're looking for.

As a nonprofit organization whose vision it is to ensure a safe and healthy home for every person, Rebuilding Together has an ethical responsibility to protect our homeowners and volunteers from lead. At a minimum, a Rebuilding Together affiliate's best practices are to:

- Distribute a copy of Renovate Right to each homeowner & have them sign the receipt
- Train house captains to incorporate and enforce lead safe work practices on their projects
- Assume lead is present in every pre-1978 project & take measures to educate unskilled volunteers and provide education and materials to conduct lead safe work practices

Rebuilding Together Context

Our shared vision: “A Safe and Healthy Home for Every Person”



Does the RRP Rule Apply to My Affiliate?

- ☐ Does the project involve activities that disturb painted surfaces in a home or child occupied facility built before 1978?
 - Are any of the following conditions present?
 - Work consists of only minor repairs or maintenance that disturbs less than 6 square feet of painted surface per room or less than 20 square feet of painted surface for exterior activities. Note: HUD's definition of minor repair and maintenance that is exempt from its rule is different than EPA's (2 square feet interior and 20 square feet exterior or 10 percent of the surface area of a small building component type).
 - Housing is for the elderly or disabled and no children under six reside or are expected to reside there
 - **If so, EPA RRP requirements do not apply**

- ☐ Is the project an emergency renovation?
 - Activity was not planned and if not immediately completed a safety hazard will exist or property with significant damage will result
 - **Pre-renovation RRP education requirements do not apply**

- ☐ Has the **Rebuilding Together Affiliate** obtained a signed statement from the owner that:
 - The renovation will occur in the owner's residence;
 - No child under six resides there;
 - No women who is pregnant resides there;
 - The housing is not a child-occupied facility; AND
 - Owner acknowledges that the Rebuilding Together affiliate doing the renovation will not be required to use the work practices contained in the RRP Rule – if so
 - **If so, EPA RRP requirements do not apply**

Does the RRP Rule Apply to My Affiliate?

If the project will disturb painted surfaces in a home or child occupied facility built before 1978 and the project was not excluded under the conditions already discussed then:

- **Owner Occupied Single Family**

- You will need to provide the lead pamphlet “Renovate Right” to property owner(s) in owner occupied home.
 - 7 days prior to project if by mail with certificate of mailing.
 - Deliver to homeowner before the renovation begins and obtain a confirmation receipt.
- **EPA RRP requirements do apply**

- **Owner Occupied Multi-Family (Common Area Only)**

- Provide owner with “Renovate Right” pamphlet as outlined in owner occupied single family guideline.
- Notify tenants and make “Renovate Right” pamphlet available or post signs describing the renovation including information on how to obtain a copy of the pamphlet “Renovate Right.”
- Maintain written documentation on notification procedures (see forms section).
- **EPA RRP requirements do apply**

Work Practice Requirements-General

- Post signs clearly defining the work area and warning occupants and other persons to remain outside the work area.
- Contain the work area so no dust or debris leave the work area during renovation.
- Prohibited work practices
 - Open flame burning of lead based paints.
 - Use of machines that remove lead based paint such as sanding, grinding, power planing unless machines are used with HEPA exhaust control.
 - Operating a heat gun on lead-based paint at temperatures of 1100 degrees Fahrenheit or higher.
- Waste from Renovations
 - Waste must be contained to prevent release of dust and debris before removal from work area for disposal.
 - At the conclusion of each work day and at the end of the project waste collected from renovation activities must be stored or disposed of to prevent access to and the release of dust and debris.
 - Waste transported from renovation must be contained.
 - Work wet, work clean.



Work Practice Requirements—Interior Renovations

- Remove all objects from the work area or cover them with plastic sheeting.
- Close and cover with plastic all dust opening in the work area.
- Close windows and doors in work area. Door openings must be covered with plastic.
- Cover the floor with taped down plastic sheeting a minimum of six feet beyond the surfaces undergoing renovation.
- Use precautions to ensure that all personnel, tools and other items are free of dust when leaving the work area.
- After the renovation has been completed, the work area must be cleaned until no dust, debris or residue remains. The renovation team must:
 - Collect all paint chips and debris and seal in heavy-duty plastic bag.
 - Remove and dispose of all plastic sheeting as waste.
 - Clean all objects and surfaces in the work area working down from the ceiling to the floor by either vacuuming with a HEPA vacuum or wiping with a damp cloth.
 - Thoroughly vacuum all remaining surfaces and objects in the work area including furniture and fixtures with a HEPA Vacuum.
 - Wipe all remaining surfaces and objects in the work area, except for carpeted or upholstered surfaces, with a damp cloth. Mop uncarpeted floors using a mopping method that keeps wash water and rinse water separate.

Cleaning Verification-Interior Visual Inspection

- Perform a visual inspection for dust, debris or residue.
- Wipe all uncarpeted floors, countertops and windowsills within the work area using a wet disposable cleaning cloth (Swifter). Compare to cleaning verification card. If cleaning cloth not darker than the cleaning verification card you are finished.
- Re-clean any areas that failed.
- Wait until the failed area has dried completely and then wipe that area with a clean disposable cleaning cloth and compare to cleaning verification card.



Work Practice Requirements-Exterior

- Close all doors and windows within 20 feet of the renovation
- Cover doors within the work area with plastic sheeting
- Cover the ground with plastic sheeting a minimum of 10 feet beyond the perimeter of the work area
- In situations where work area is in close proximity to other buildings, windy conditions, etc., the renovation team must take extra precautions in containing the work area
- Close all doors and windows within 20 feet of the renovation
- Cover doors within the work area with plastic sheeting
- Cover the ground with plastic sheeting a minimum of 10 feet beyond the perimeter of the work area
- In situations where work area is in close proximity to other buildings, windy conditions, etc., the renovation team must take extra precautions in containing the work area
- After renovation is complete clean the work area until no dust, debris or residue remains. The renovation team must:
 - Collect all paint chips and debris and seal in a heavy-duty plastic bag
 - Remove and dispose of all plastic sheeting as waste
 - Waste transported from renovation must be contained to prevent release of dust and debris.
- Perform a visual inspection to ensure that no dust, debris and residue are present

The HUD Lead Safe Housing Rule

The US Department of Housing & Urban Development's Lead Safe Housing Rule (24 CFR Part 35) covers pre-1978 federally-owned or assisted housing and federally-owned housing that is being sold. It does not cover child-occupied facilities outside of residential housing. The requirements of HUD's rule are similar to EPA's RRP rule, but there are some differences in the details, including:

- **Exemptions.** HUD's rule does not allow owners of federally-assisted housing to opt out of its requirements.
- **Training Requirements.** HUD does not recognize on-the-job training. To conduct lead hazard control in federally-assisted housing, either all workers must have completed a HUD-approved course, or the crew must be supervised by a Certified Renovator who is also a Certified Lead Abatement Supervisor.
- **Minor Repair and Maintenance.** HUD's definition of minor repair and maintenance that is exempt from its rule is different than EPA's (2 square feet interior and 20 square feet exterior or 10 percent of the surface area of a small building component type).

Note: If HUD money is used to fund a project, then the HUD Lead Safe Housing Rule will apply

Find a copy of HUD's Lead Safe Housing Rule here:

http://www.hud.gov/offices/lead/library/enforcement/24CFR35_SubpartA.pdf

Or, go to <http://www.hud.gov> and enter "25 CFR Part 35" in the search option

Resources

For additional information on how to protect yourself and your homeowners from lead paint hazards visit <http://www.epa.gov/lead> or call the National lead Information Center at 1-800-424-LEAD (5323) to order free copies. Available documents include:

Renovate Right: Important Lead Information for Families, Child Care Providers and Schools
www.epa.gov/lead/pubs/renovaterightbrochure.pdf

Joint EPA-HUD Curriculum: Lead Safety for Remodeling, Repair and Painting
www.epa.gov/lead/pubs/rrp_8hr_studentmanual_feb09.pdf

Lead Paint Safety: A field Guide for Painting, Home maintenance, and Renovation Work
<http://www.hud.gov/offices/lead/training/LBPguide.pdf>

Fight Lead Poisoning with a Healthy Diet
<http://www.epa.gov/lead/pubs/nutrition.pdf>

Protect Your Family From Lead in Your Home
<http://www.epa.gov/lead/pubs/leadpdf.pdf>

Lead in Your Home: A Parent's Reference Guide
<http://www.epa.gov/lead/pubs/leadrev.pdf>

Help Yourself to a Healthy Home
http://www.hud.gov/offices/lead/library/hhi/HYHH_Booklet.pdf

Other helpful guides from the Federal Government include:

Pre-renovation Disclosure Form
<http://epa.gov/lead/pubs/pre-renovationform.pdf>

Sample Record Keeping Form
<http://epa.gov/lead/pubs/samplechecklist.pdf>

EPA-Small Entity Compliance Guide to Renovate Right
www.epa.gov/lead/pubs/sbcomplianceguide.pdf

For a video on Lead Safe Work Practices, visit <http://www.rebuildingtogetherinstitute.org/> and click on "Video Presentations." Under "Category," select "Don't Spread Lead." The video is available in English and Spanish.

Occupant Confirmation Form

Pamphlet Receipt

___ I have received a copy of the lead hazard information pamphlet informing me of the potential risk of the lead hazard exposure from renovation activity to be performed in my dwelling unit. I received this pamphlet before the work began.

Owner-occupant Opt-out Acknowledgment

___ (A) I confirm that I own and live in this property, that no child under the age of 6 resides here, that no pregnant woman resides here, and that this property is not a child-occupied facility.

Note: A child resides in the primary residence of his or her custodial parents, legal guardians, foster parents, or informal caretaker if the child lives and sleeps most of the time at the caretaker's residence.

Note: A child-occupied facility is a pre-1978 building visited regularly by the same child, under 6 years of age, on at least two different days within any week, for at least 3 hours each day, provided that the visits total at least 60 hours annually.

If Box A is checked, check either Box B or Box C, but not both.

___ (B) I request that the renovation firm use the lead-safe work practices required by EPA's Lead-Based Paint Renovation, Repair, and Painting Rule; or

___ (C) I understand that the firm performing the renovation will not be required to use the lead-safe work practices required by EPA's Lead-Based Paint Renovation, Repair, and Painting Rule.

Printed Name of Owner-occupant _____

Signature of Owner-occupant Signature _____

Date _____

Affiliate Representative Signature _____

Date _____

Self Certification Option Form (for tenant-occupied dwellings only)

Instructions to Renovator: If the lead hazard information pamphlet was delivered but a tenant signature was not obtainable, you may check the appropriate line below.

Declined – I certify that I have made a good faith effort to deliver the lead hazard information pamphlet to the rental dwelling unit listed below at the date and time indicated and that the occupant declined to sign the confirmation of receipt. I further certify that I have left a copy of the pamphlet at the unit with the occupant.

Unavailable for signature – I certify that I have made a good faith effort to deliver the lead hazard information pamphlet to the rental dwelling unit listed below and that the occupant was unavailable to sign the confirmation of receipt. I further certify that I have left a copy of the pamphlet at the unit by sliding it under the door or by (fill in how pamphlet was left).

Printed Name of Person Certifying Delivery _____

Attempted Delivery Date _____

Signature of Person Certifying Lead Pamphlet Delivery _____

Unit Address _____

Note Regarding Mailing Option — As an alternative to delivery in person, you may mail the lead hazard information pamphlet to the owner and/or tenant. Pamphlet must be mailed at least 7 days before renovation. Mailing must be documented by a certificate of mailing from the post office.