



WILL YOU NEED TO BE IN COMPLIANCE?

What Is the Lead-Based Paint Renovation, Repair and Painting Program (RRP)?

- The Lead-Based Paint Renovation, Repair and Painting Program is a federal regulatory program affecting contractors, property managers, and others who disturb painted surfaces.
- It applies to residential houses, apartments, and child-occupied facilities such as schools and day-care centers built before 1978.
- It includes pre-renovation education requirements as well as training, certification, and work practice requirements.

Pre-renovation education requirements are effective now:

- Contractors, property managers, and others who perform renovations for compensation in residential houses, apartments, and child-occupied facilities built before 1978 are required to distribute a lead pamphlet before starting renovation work.

Training, certification, and work practice requirements become effective April 22, 2010:

- Firms are required to be certified, their employees must be trained in use of lead-safe work practices, and lead-safe work practices that minimize occupants' exposure to lead hazards must be followed.
- Renovation is broadly defined as any activity that disturbs painted surfaces and includes most repair, remodeling, and maintenance activities, including window replacement.
- The program includes requirements implementing both Section 402(c) and 406(b) of the Toxic Substances Control Act (TSCA). (www.epa.gov/lead/pubs/titleten.html)
- EPA's lead regulations can be found at 40 CFR Part 745, Subpart E.

Who Must Follow the 2008 Lead Rule's Requirements?

In general, anyone who is paid to perform work that disturbs paint in housing and child-occupied facilities built before 1978, this may include, but is not limited to:

- Residential rental property owners/managers
- General contractors
- Special trade contractors, including
 - Painters
 - Plumbers
 - Carpenters
 - Electricians
 - HVAC

What Activities Are Subject to the Lead Renovation, Repair and Painting Program?

In general, any activity that disturbs paint in pre-1978 housing and child-occupied facilities, including:

- Remodeling and repair/maintenance
- Electrical work
- Plumbing
- Painting
- Carpentry
- Window replacement
- HVAC installation/replacement

What are you required to do to comply?
See back of page for additional information.

What Does the Program Require Me To Do?

Pre-renovation education requirements - Effective now.

In housing, you must:

- Distribute EPA's lead pamphlet to the owner and occupants before renovation starts.

In a child-occupied facility, you must:

- Distribute the lead pamphlet to the owner of the building or an adult representative of the child-occupied facility before the renovation starts.

For work in common areas of multi-family housing or child-occupied facilities, you must:

- Distribute renovation notices to tenants or parents/guardians of the children attending the child-occupied facility. Or you must post informational signs about the renovation or repair job.

Informational signs must:

- Be posted where they will be seen;
- Describe the nature, locations, and dates of the renovation; and
- Be accompanied by the lead pamphlet or by information on how parents and guardians can get a free copy
- Obtain confirmation of receipt of the lead pamphlet from the owner, adult representative, or occupants (as applicable), or a certificate of mailing from the post office.

- Retain records for three years.

• Note: Pre-renovation education requirements do not apply to emergency renovations. Emergency renovations include interim controls performed in response to a resident child with an elevated blood-lead level.

Training, Certification, and Work Practice Requirements— Effective after April 22, 2010.

- Firms must be certified.
- Renovators must be trained. **(See attached information re: training courses offered locally.)**
- Lead-safe work practices must be followed. Examples of these practices include:
- Work-area containment to prevent dust and debris from leaving the work area.
- Prohibition of certain work practices like open-flame burning and the use of power tools without HEPA exhaust control.

- Thorough clean up followed by a verification procedure to minimize exposure to lead-based paint hazards.

• The training, certification, and work practice requirements do not apply where the firm obtained a signed statement from the owner that all of the following are met:

- The renovation will occur in the owner's residence;
- No child under age 6 resides there;
- No woman who is pregnant resides there;
- The housing is not a child-occupied facility; and
- The owner acknowledges that the renovation firm will not be required to use the work practices contained in the rule.

When Do These Requirements Become Fully Applicable to Me?

– April 2009:

- Training providers may begin applying for accreditation.
- Once training providers are accredited, they may offer training courses that will allow renovators to become certified.

–October 2009 - Renovation firms may begin applying to EPA for certification.

–April 2010 - Program fully effective. Work practices must be followed.

How Will a Firm Become Certified?

Beginning in October 2009, firms may apply to EPA for certification to perform renovations or dust sampling. To apply, a firm must submit to EPA a completed "Application for Firms," signed by an authorized agent of the firm, and pay the correct amount of fees. To obtain a copy of the "Application for Firms" contact the NLIC at 1-800-424-LEAD (5323) or visit www.epa.gov/lead/pubs/renovation.htm.