

TECHNICAL BULLETIN

DATE: May 11, 2011

TO: N. Dennison
D. Eureka
D. Gandee
T. Harrison
N. Hatfield

C. Howard
T. Jasinski
J. Kline
J. Lear
D. Olive

T. Price
T. Purny
M. Wodkowski

SUBJECT: EPA's Lead Renovation, Repair, & Painting Program (RRP) Rule

As you probably know, EPA released a new regulation titled "Lead; Renovation, Repair, & Painting Program; Lead Hazard Information Pamphlet; Notice of Availability; Final Rule" which took effect in 2010. Contractors (including asbestos hazard abatement contractors) will be required to follow this rule on some of our renovation projects. Please review attached document entitled *Field Reference Sheet for Lead RRP*. On those projects where the abatement contractor is required to follow the RRP, this reference sheet should be given to our RPR(s) for informational purposes. Additionally, if requested, you are welcome to share this information with abatement contractors, construction managers, and building owners.

Additionally, we have prepared a power point presentation regarding this regulation that we would like everyone to review. It can be found in the folder titled "LEAD RRP Power Point" under "Work Basket" on our network server.

END OF BULLETIN

FIELD REFERENCE SHEET FOR LEAD RRP

RRP Rule applies to disturbance of surface coatings (paint, stains, varnishes, etc.) in pre-1978 housing and child-occupied facilities (children < 6 years of age).

Regulated Activities:

1. Disturbance > 6 sf of interior surface coatings per room or > 20 sf of exterior surface coatings. The entire surface area of a removed component is the amount of paint surface disturbed within a 30-day period (if bottom 3rd of door is cut off, then area is 1/3 of door; if door is removed through removal of hinges only, only the hinge is measured).
2. Window replacement projects.
3. Demolition (e.g., selective demolition) - complete building demolition is not regulated.

Contractor Requirements under RRP:

1. Renovation work which includes a regulated activity in housing or child-occupied facility shall be performed by:
 - a. Certified firm(s) [every firm receiving compensation for this work (including firms that plan to subcontract regulated work activities to another firm)]; and
 - b. Certified Renovator who is responsible for the work including performance of specific tasks (see Item 2 below). Eight-hour training session is required to become a Certificated Renovator.
2. Certified Renovator's responsibilities:
 - a. Assume coating is lead-based paint or procure samples using a recognized test kit (unless there is a report conducted per HUD Guidelines using XRF or laboratory analyses of paint chips).
 - b. Provide training to uncertified workers regarding use of lead-safe work practices. Training shall be project specific. The RRP does not specify a duration for this training.
 - c. Be present on site during installation of signage, establishment of work area containment, and completion of work area cleaning step.
 - d. Ensure renovation is completed using lead-safe work practices.
 - e. Conduct post-renovation cleaning step.
 - f. Prepare records for the project (see Item 5 below).
3. Within 60 days before start of work, provide EPA's *Renovate Right* pamphlet and information to building owner regarding work practices that will be used. (EPA has a sample form.)
4. Within 60 days before start of work, provide renovation information to parents and guardians of children under the age of six that attend facilities being renovated; this provision can be satisfied by: sending the information by mail; hand-delivery; or posting informational signage. If information signage is utilized, it must: be posted where the signs can be seen; describe nature of work; identify locations and dates of renovation work; and be accompanied by a copy of the *Renovate Right* pamphlet (or alternatively provide information on how a parent or guardian can get a copy of the pamphlet at no cost).
5. Prepare paperwork at completion of each project (within 30 days of completion of work); the records must be kept for at least 3 years. At minimum, this documentation includes the following: inspection information (e.g., report or test kit information); records of information being posted and/or delivered; worker credentials; firm certification; statement about findings of the post renovation cleaning verification step; copy of dust sampling report (if applicable); and certification that proper work practices were used. (EPA has a sample form.)

Lead-Safe Work Practices:

1. Demarcate work areas by posting warning signage.
2. Shut down HVAC equipment.
3. Isolate work areas (critical barriers over entries to work areas, windows, doors and ductwork).
4. Remove all moveable objects from work area.
5. Cover flooring and objects within at least six feet of area undergoing renovation with polyethylene film sealed with tape.
6. For exterior work, close all doors and windows within 20 feet of work on the same floor and all floors below and provide drop cloths extending at least 10 feet from the edge of structure (tape down plastic drop cloths or other impermeable material). Add vertical containment as necessary to prevent the spread of lead dust (e.g., for purpose of addressing windy conditions). Covering of plants should be reviewed on a case by case basis.
7. Mist painted surfaces prior to sanding, scraping, drilling and cutting.
8. Score paint before separating components.
9. Properly dispose of debris. Waste must be sealed in bags or plastic sheeting.
10. Pick up all paint chips and debris from drop cloths and mist drop cloths before removing them.
11. Thoroughly clean work area and area within 2' of work area (including walls, objects, floors, materials, equipment, etc.) using wet methods or HEPA-equipped vacuums. Wet methods include utilization of two bucket wash system (rinse and wash). Cleaning should start at top of work area and work down. Ensure personnel, tools, waste etc. are free of visible dust before leaving work area.
12. Personal protective equipment should include: eye protection; clothing; and respirator.
13. Use hand washing stations or, for dusty areas, decontamination structures (showers).
14. Prohibit the following work activities: open-flame burning or torching; high speed operation equipment used to remove LBP without HEPA exhaust control; and use of heat gun exceeding 1,100 degrees F.
15. Clearance minimum requirements:
 - a. Exterior work - visual inspection.
 - b. Interior work - visual inspection and cleaning verification process.
 - 1) Wiping of hard floors, countertops and window sills separately with a wet cleaning cloth (one cloth for each 40 square foot section of floor). Carpeting does not get wiped but must be cleaned with a HEPA-equipped vacuum which has a beater bar. Uncarpeted floors must be wiped using an application device with a long handle and a head to which the cloth is attached.
 - 2) Reclean any area where the wet cleaning cloth does not match the cleaning verification card, then redo step one.
 - 3) If the second cloth does not match the cleaning verification card, certified firm is required to clean one more time using a dry cleaning cloth after waiting at least one hour or until the surface has dried completely, whichever is longer.

Note that this document has been prepared for guidance purposes only. Although Gandee & Associates, Inc. strives to provide accurate, complete and useful information, this document is not intended to cover all regulatory issues, interpretations or requirements applicable to the subject. Neither Gandee & Associates, Inc. nor any person contributing to the preparation of this document make any warranties, guarantees, or representations (express or implied) with respect to usefulness or effectiveness of information disclosed in this document or assume any liability for the use of or for any damages arising from the use of information disclosed in this document. User should review applicable regulations prior to starting any work which will disturb lead-containing materials.