



EPA Lead Renovation, Repair and Painting (RRP)

Application

The EPA Renovation, Repair and Painting Rule (RRP) which went into effect nationally **on April 22, 2010**, applies to work performed for compensation in a residence or child occupied facility built before 1978. Child Occupied refers to any place a child spends at least two 3 hour visits on two different days per week. Compliance with RRP will add roughly five to twenty percent to the cost of performing repairs to regulated structures, and possibly more in some instances.

EPA Compliance Rules

- General Contractors and their Subcontractors must have at least one staff member who has gone through the one-day Lead Renovator training. This individual must train all workers performing manual labor in lead safe practices, and verify in person that proper cleaning is completed. The firm must be an EPA registered lead safe contractor.
- The rules apply to jobs where 6 square feet of potentially contaminated space is disturbed inside a home and where 20 square feet of potentially contaminated space is disturbed outside.
- General Contractors and Sub Contractors are now responsible to notify clients about the possibility of lead contamination by distributing the Renovate Safe brochure published by the EPA.
- Homeowners must be restricted from the work area during the demolition phase or during work that would release lead dust.
- Work areas must be isolated from occupied spaces with warning signs, and physical barriers according to EPA standards. In most cases, this involves plastic sheeting sealing off rooms and plastic sheeting on floors or the outside ground. If power tools such as sanders are used, they must be equipped with shrouds connected to HEPA vacuums to collect dust.
- Clean up requires thorough cleaning all walls, surfaces and floors using true HEPA vacuums, electrostatic dusters, pre-moistened cleaning pads, cleaning solutions and electrostatic dusters. Field swab tests are done after cleaning to check for the presence of lead. If lead above the allowable limit is found, the cleaning process is repeated.

Implementation/Enforcement

- Project specific documentation must be maintained to verify worker training and compliance.
- Contractors/Sub Contractors must know if RRP Rule applies before pricing the job.
- The penalty for improper work practices and/or failure to provide documentation is \$37,000 per day.