

Renovate Right, Get Certified!

What contractors need to
know about EPA's Lead-
Based Paint Renovation,
Repair, and Painting Rule

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National Lead Poisoning Prevention Week

- Call to bring together individuals, organizations, industry and Tribal, state and local governments to reduce childhood lead exposure by increasing lead poisoning prevention awareness.
- October is National Children's Health Month: epa.gov/children/childrens-health-month
- Visit epa.gov/lead/nlppw for outreach materials, webinar registration & more



Poll:

How much do you know about
EPA's RRP Rule?

*¿Cuánto sabe sobre la normativa
RRP de la EPA?*

Agenda

Summary

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RRP Rule Summary

The Renovation, Repair, and Painting (RRP) Rule

- Addresses lead-based paint hazards created by RRP activities that disturb lead-based paint in target housing and child-occupied facilities.
- Purpose is to protect people, especially children, from the harmful effects of lead exposure.



Who must comply with the RRP Rule?



- In general, anyone who is paid to perform work that disturbs paint in housing and child-occupied facilities that were built before 1978.
- May include:
 - Residential rental property owners and managers
 - General contractors
 - Special trade contractors, including painters, plumbers, carpenters, and electricians
- You **must** be certified by EPA as a lead-safe certified firm if you perform or offer to perform work that disturbs painted surfaces on pre-1978 buildings.

Duty to Your Community

- You play a critical role in helping to prevent lead exposure.
- Renovation, repair and painting activities can create toxic lead dust that can harm your customers, workers, and even yourself.
- By following lead-safe work practices, you can prevent lead hazards!





Health Effects of Lead Exposure

Lead Harms Children



Children under age 6 are more vulnerable to lead exposure.

- No safe level of lead exposure has been identified.
- Lead exposure is particularly harmful to children. Even at low levels, it can cause:
 - Behavior and learning problems
 - Lower IQ
 - Hyperactivity
 - Slowed growth
 - Hearing problems
 - Anemia
- Neurological and behavioral effects are irreversible.
- Unsafe renovation activities are associated with an increased risk of elevated lead levels in children.

Lead Harms Adults

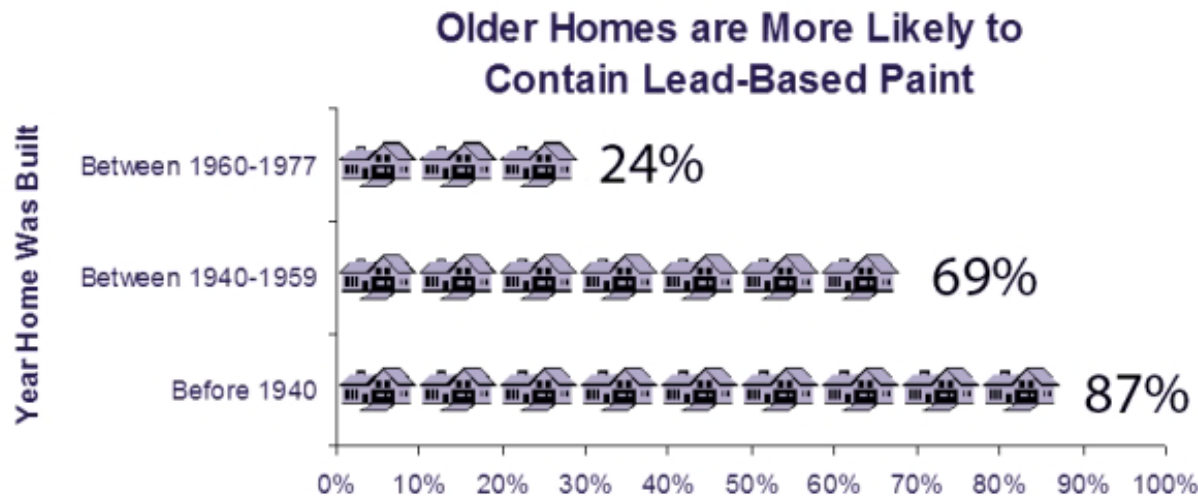
- Adults exposed to lead can suffer from:
 - Irritability
 - Headaches, stomachaches, nausea, and fatigue
 - Cardiovascular effects, increased blood pressure, and hypertension
 - Decreased kidney function
 - Reproductive problems (in both men and women)
- Adults may breathe in lead dust by spending time in areas where lead-based paint is deteriorating, and during RRP work that disturbs painted surfaces in older buildings.





Lead-Based Paint in Housing

Why Lead Exposure is Still a Risk



- In 1978, the federal government banned consumer uses of lead-based paint.
- More than 30 million homes still have lead-based paint, usually under layers of newer paint.
- The older the home, the more likely it is to contain lead-based paint.

Common Sources of Lead Exposure

- Lead-based paint chips and dust are hazardous sources of exposure to lead.
- Lead in dust results from old lead-based paint deteriorating or being on surfaces that are frequently in motion or rub together, such as window frames.
 - People, especially children, can swallow and breathe in lead dust as they eat and play.
 - People may also breathe in lead dust while they work on jobs that sand, scrape, heat, blast or otherwise disturb surfaces that contain lead-based paint.



Lead-based paint deteriorates and creates contaminated dust and soil.



Housing Covered by the RRP Rule

Covered	<u>Not</u> Covered
• Most housing built before 1978 • Public housing • Private housing • Short-term lodging • Common areas that are accessible to all residents (interior and exterior) • Hallways and stairways • Laundry and recreational rooms • Playgrounds • Community centers • Boundary fences • Child-occupied facilities built before 1978 • Childcare facilities • Preschools • Window replacement • Partial and full demolition activities	• Housing built in 1978 or later • Zero-bedroom housing • Studio and efficiency apartments • Dorms • Housing specifically for elderly and disabled people • Unless a child under 6 lives or is expected to live there • Housing or components declared lead-free by a certified lead inspector or risk assessor • Minor repair and maintenance activities which are renovations that disturb less than 6 square feet of paint per room inside, or less than 20 square feet on the exterior of the building



RRP Rule Requirements

Main Components of the RRP Rule

- Certification of renovators and firms
- Accreditation of training providers
- Renovation, repair, and painting activities
 - Before: Pre-renovation education
 - During: Work practice standards
- Applies nationally
 - Except in states and tribes that receive authorization to run their own programs (Alabama, Delaware, Georgia, Iowa, Kansas, Massachusetts, Mississippi, North Carolina, Oklahoma, Oregon, Rhode Island, Utah, Vermont, Washington, Wisconsin, and the Minnesota Chippewa tribe- Bois Forte (Nette Lake))



EPA RRP Individual Certification



Individual certification

- Renovators and Dust Sampling Technicians
 - Must take an 8-hour accredited training course.
 - Course certificate serves as certification (no application to EPA required).
- Renovator **recertification** can be done with or without the in-person hands-on component.
 - If the renovator chooses a course with a hands-on component, the certification is good for 5 years.
 - If the renovator chooses an online course without hands-on, their certification is good for 3 years and their next certification must be done with the in-person hands-on component.

United States Environmental Protection Agency

This is to certify that

Linear Environmental Corp.

has fulfilled the requirements of the Toxic Substances Control Act (TSCA) Section 402, and has received certification to conduct lead-based paint activities pursuant to 40 CFR Part 745.226

In the Jurisdiction of:

All EPA Administered Lead-based Paint Activities Program States, Tribes and Territories

This certification is valid from the date of issuance and expires November 03, 2027

LBP-2261-3

Certification #

September 13, 2024

Issued On




Marc Edmonds, Chief

Risk Assessment Management Branch 2.

Firm certification

EPA RRP Firm Certification

- Firms submit an application and fee to EPA.
- Must be recertified every 5 years.



How to Get Certified

- Take a certification training with an accredited training provider
- There are **two** certifications, depending on whether you do renovation work or abatement work
 - If you do both, you must be certified for both
- Accredited lead-based paint trainer search:
<https://cdxapps.epa.gov/ocspp-oppt-lead/training-search>
- Firm certification:
epa.gov/lead/getcertified

- 1 Select type of search**
Select the type of search required from the drop-down list below.

Select type of search

Find an accredited trainer in your area
- 2 RRP or Lead Abatement Trainer**
Select a program from the list below.

Select

RRP
- 3 Where will you work when certified?**
Select the state from the list below.

Select a State

- Select -
- 4 Select type of course needed**

EPA Training Provider Accreditation

- To be accredited for renovator or sampling technician training, trainers must submit an application and fee to EPA
- Trainers must be re-accredited every 4 years
 - Initial course is 8 hours
 - Refresher course is 4 hours
- Must provide EPA training notification
- Information for training providers:
epa.gov/lead/rrp-program-training-providers



State-Authorized RRP Programs

Not to Scale

Rhode Island

Delaware

D.C.

Puerto Rico

Not Authorized

Authorized

State	Authorization Status
Alaska	Not Authorized
Alabama	Not Authorized
Arizona	Not Authorized
Arkansas	Not Authorized
California	Not Authorized
Colorado	Not Authorized
Connecticut	Not Authorized
Delaware	Not Authorized
Florida	Not Authorized
Georgia	Authorized
Hawaii	Not Authorized
Idaho	Not Authorized
Illinois	Authorized
Indiana	Not Authorized
Iowa	Authorized
Kansas	Authorized
Kentucky	Not Authorized
Louisiana	Not Authorized
Maine	Not Authorized
Maryland	Not Authorized
Massachusetts	Not Authorized
Michigan	Not Authorized
Minnesota	Not Authorized
Mississippi	Not Authorized
Missouri	Not Authorized
Montana	Not Authorized
Nebraska	Not Authorized
Nevada	Not Authorized
New Hampshire	Not Authorized
New Jersey	Not Authorized
New Mexico	Not Authorized
New York	Not Authorized
North Carolina	Not Authorized
North Dakota	Not Authorized
Ohio	Not Authorized
Oklahoma	Not Authorized
Oregon	Authorized
Puerto Rico	Not Authorized
Rhode Island	Not Authorized
South Carolina	Not Authorized
South Dakota	Not Authorized
Tennessee	Not Authorized
Texas	Not Authorized
Vermont	Not Authorized
Virginia	Not Authorized
Washington	Authorized
West Virginia	Not Authorized
Wisconsin	Authorized
Wyoming	Not Authorized



Activities Covered by the RRP Rule

Which activities are covered by the RRP Rule?



- In general, any activity that disturbs paint in housing and child-occupied facilities built before 1978. This includes:
 - Remodeling and repair/maintenance
 - Electrical work
 - Plumbing
 - Painting preparation
 - Carpentry
 - Window replacement

Pre-Renovation Education

- Firms who perform renovations must:
 - Distribute EPA's "Renovate Right" pamphlet before starting renovation work to occupants and owners of homes and child-occupied facilities
- Either distribute renovation notices or post informational signs
 - In common areas: notify residents
 - In child-occupied facilities: notify parents



Work Practice Standards

- Post signs defining the work area
- Contain the work area so that no dust or debris can leave the area
- Prohibited practices:
 - Open-flame burning or torching
 - Operating a heat gun above 1100°F
 - Using machines that remove paint, unless equipped with HEPA exhaust control



Work Practice Standards: Cleaning and Verification



- Cleaning
 - Must clean the work area until no dust, debris or residue remains
 - Vacuum surfaces and objects in the work area
 - Mop uncarpeted floors
- Verification of cleanliness
 - Verification procedure or
 - Clearance testing

Revised Dust-Lead Hazard and Clearance Levels

- In October 2024 EPA revised the dust-lead hazard standards (DLHS) and dust-lead clearance levels (DLCL).
- Nomenclature change
 - DLHS → Dust-Lead Reportable Level (DLRL)
 - DLCL → Dust-Lead Action Level (DLAL)
- DLRL are any level of dust reported by an EPA-recognized lab
- DLAL are **<5 $\mu\text{g}/\text{ft}^2$ for floors, <40 $\mu\text{g}/\text{ft}^2$ for windowsills and < 100 $\mu\text{g}/\text{ft}^2$ for window troughs**
 - Program shift: EPA now recommends abatement when dust-lead levels are above the DLAL, not the DLRL.
- The final rule will be effective 60 days after its publication in the Federal Register and the lower standards will be required in EPA-administered programs in January 2026.



Revised Dust-Lead Hazard and Clearance Levels.

Final rule included other changes:

1. **Abatement Report**: Added additional language to educate the public on how to take action against exposure after an abatement is considered complete, if levels fall between DLAL and DLRL
2. **Definition of Target Housing**: Updated to include 0-bedroom dwellings where children under 6 may reside to conform with the 2017 statutory change in 15 U.S.C. §2681(17)
3. **Definition of Child-Occupied Facilities**: Defined as pre-1978 buildings where children “under 6 years of age” regularly visit to establish consistency across the lead program and for the regulated community
4. **Electronic Submissions**: Payments, applications, and notices will only be accepted electronically via EPA’s Central Data Exchange (CDX) to reduce administrative costs and conform to the U.S. Treasury Department’s process





Compliance & Enforcement

What happens if I fail to comply with the RRP Rule?



- EPA may suspend or revoke a firm's certification or a trainer's accreditation.
- In addition, non-compliance can lead to civil penalties of up to \$48,512 per violation.
- Know of a violation? Report it at epa.gov/lead/violation

If you're out of compliance... get certified!

- You **must** be lead-safe certified by EPA if you perform or offer to perform work that disturbs painted surfaces of pre-1978 buildings.
- Certification is important to protect both your workers and your clients.
- Visit epa.gov/lead/getcertified to ensure compliance with RRP firm certification requirements.





Questions?

Resources



- RRP Contractors
 - epa.gov/lead/renovation-repair-and-painting-program-contractors
 - How to apply for firm certification
 - Renovator training
 - Resources
- Renovate Right
 - epa.gov/lead/renovateright
- Steps to Lead-safe RRP
 - epa.gov/lead/steps-lead-safe-renovation-repair-and-painting
- Small Entity Compliance Guide to Renovate Right
 - epa.gov/lead/small-entity-compliance-guide-renovate-right-epas-lead-based-paint-renovation-repair-and-0
- If you or your organization or business interacts regularly with consumers who may be affected by residential RRP activities, please help us get the word out about EPA's protections
 - epa.gov/lead/epa-lead-safe-certification-program-outreach-consumers
- National Lead Information Center
 - Call 1 (800) 424-LEAD [5323]
 - Via TTY 711 for those with hearing or speech disabilities
 - Open Monday – Friday, 8:00 a.m. to 6:00 p.m. ET excluding federal holidays



Thank you for
your time!