



# EPA Renovation, Repair, & Painting Program (RRP)

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## Agenda

**1**

Introduction to Lead at EPA

**2**

1018 Lead Disclosure Rule

**3**

Renovation, Repair, & Painting Rule

**4**

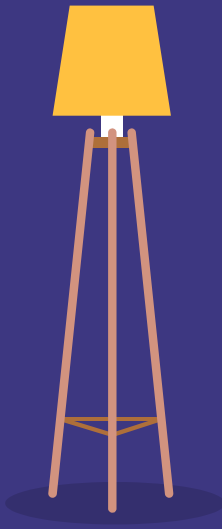
CAHCEO & EPA Collaboration



1

# Introduction to Lead at EPA

Lead Based Paint Regulations & Definitions



## **EPA's Lead-Based Paint Rules Prevent Childhood Lead Exposure and Poisoning**

By educating consumers and regulating businesses involved with Target Housing and Child Occupied Facilities.

## Target Housing (TH)

is any pre-1978 built housing. Housing for elderly persons or disabled persons and 0-bedroom dwellings are exempt unless a child is present. Target housing includes residential **Child Occupied Facilities**.

## Child Occupied Facility (COF)

is a pre-1978 built building, regularly visited by a child under six years of age. Child-occupied facilities may be public or commercial buildings or in **target housing**.



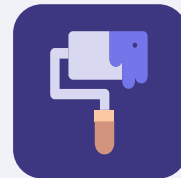
## EPA's Lead-Based Paint Rules



### 1018 Lead Disclosure

In TH:

- Sellers/lessors educate buyers/renters about potential lead paint hazards.
- Allows buyers/renters to make informed decisions prior to purchasing/leasing



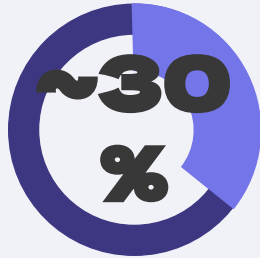
### Renovation, Repair & Painting (RRP)

In TH & COF's:

- Firms and Renovators must be certified and follow Lead-Safe Work Practices.
- Record keeping informs residents of potential hazards and documents compliance.

## CT Geographic Initiative: 2020 - 2023

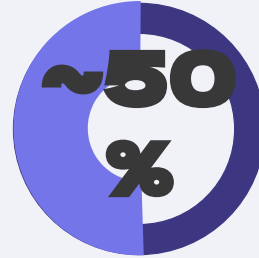
### Enforcement Responses



Warning Letters



Penalty  
Cases



No Action

2

# 1018 Lead Disclosure Rule

Toxic Substances Control Act (TSCA) § 402(c)(3);  
& 40 CFR §§ 745.100-119



## Protect Your Family From Lead in Your Home



March 2021



# 1018 Disclosure Rule

EPA's Disclosure Rule became effective on **March 6, 1996.**

**Prior to buying/renting Target Housing the seller/lessor must provide the buyer/renter with:**

- 1) A copy of "Protect Your Family" pamphlet.**
- 2) A completed, signed and dated, disclosure of lead-based paint; which includes a "Lead Warning Statement", disclosure of all known lead paint information, and copies of all available lead records.**



## 1018 Disclosure Rule: Lead Records

### RRP Testing Results

A Certified Renovator may perform lead testing prior to a renovation; the results become lead records

### Abatement Testing & Clearance

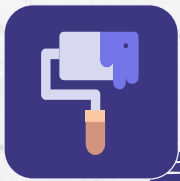
A Risk Assessor identifies lead hazards, or the lack of lead; the results become a lead records.

**Lead Records Must Be Provided by Lessor/Seller Prior to Rental/Purchase**

3

# Renovation, Repair & Painting Rule

Toxic Substances Control Act (TSCA) § 402(c)(3);  
& 40 CFR §§ 745.80-92



## Renovation, Repair & Painting Rule

EPA's RRP Rule became effective in 2002.

**Regulates compensated work that disturbs painted surfaces in pre-1978 residential buildings, and COFs with children under six years of age**  
**Includes certification, training, recordkeeping, and post renovation cleaning requirements.**



# RRP is not Abatement

## Its all about intent

### Renovation, Repair & Painting (RRP)

- Disturbs lead-based paint in TH or COFs
- Work performed at request of the property owner, with the intent to renovate.
- Work is done by Certified Renovator & Firm; training is 8 hours

### Lead Abatement

- Eliminates lead-based paint hazards
- Work can be ordered by state/local government with the intent to remove Lead.
- Work is done by state licensed Abatement Contractor; training is 40 hours

13

## Who Must Follow RRP?

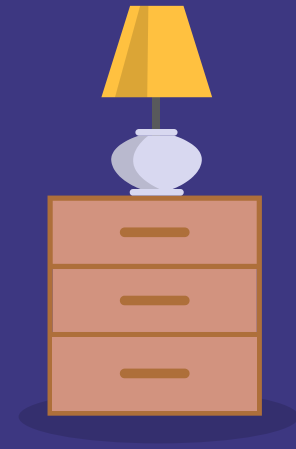


Anyone who receives compensation for work that disturbs paint in **TH & COF's** built before 1978, including:

- Renovators
- Landlords
- Painters
- Carpenters
- Roofing
- Flooring
- Window replacement
- Property managers
- Childcare owners/operators
- Maintenance staff
- Electricians & plumbers

# RRP Exceptions

- Renovations of lead-based paint free components
- Disturbing less 6 ft<sup>2</sup> per room or 20 ft<sup>2</sup> exterior
- Work done in housing they own & occupy
- Demolitions of an entire free-standing building or structure
- Lead abatement



## Sample Renovation Recordkeeping Checklist Form Approved OMB No. 2070-0195 Expires 2/29/24

Name of Firm: \_\_\_\_\_

Date and Location of Renovation: \_\_\_\_\_

Brief Description of Renovation: \_\_\_\_\_

Name of Assigned Renovator: \_\_\_\_\_

Name(s) of Trained Worker(s), if used: \_\_\_\_\_

Name of Dust Sampling Technician, Inspector, or Risk Assessor, if used: \_\_\_\_\_

Copies of renovator and dust sampling technician qualifications (training certificates, certifications) on file.

Certified renovator provided training to workers on (check all that apply):

Posting warning signs       Setting up plastic containment barriers

Maintaining containment       Avoiding spread of dust to adjacent areas

Waste handling       Post-renovation cleaning

Test kit or test results from an EPA-recognized laboratory on collected paint chip sample, used by certified renovator to determine whether lead was present on components affected by renovation (identify method used, type of test kit used (if applicable), laboratory used to conduct paint chip analysis, describe sampling locations and results): \_\_\_\_\_

Warning signs posted at entrance to work area.

Work area contained to prevent spread of dust and debris

All objects in the work area removed or covered (interiors)

HVAC ducts in the work area closed and covered (interiors)

Windows in the work area closed (interiors)

Windows in and within 20 feet of the work area closed (exteriors)

Doors in the work area closed and sealed (interiors)

Doors in and within 20 feet of the work area closed and sealed (exteriors)

Doors that must be used in the work area covered to allow passage but prevent spread of dust

Floors in the work area covered with taped-down plastic (interiors)

Ground covered by plastic extending 10 feet from work area—plastic anchored to building and weighed down by heavy objects (exteriors)

Vertical containment installed if property line prevents 10 feet of ground covering, or if necessary to prevent migration of dust and debris to adjacent property (exteriors)

Waste contained on-site and while being transported off-site.

Work site properly cleaned after renovation

All chips and debris picked up, protective sheeting misted, folded dirty side inward, and taped for removal

Work area surfaces and objects cleaned using HEPA vacuum and/or wet cloths or mops (interiors)

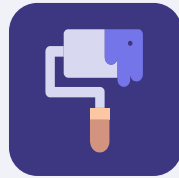
Certified renovator performed post-renovation cleaning verification (describe results, including the number of wet and dry cloths used): \_\_\_\_\_

If dust clearance testing was performed instead, attach a copy of report

I certify under penalty of law that the above information is true and complete.

\_\_\_\_\_  
Name and title

\_\_\_\_\_  
Date



## Common RRP Violations

### Not RRP Certified

Firm Certification  
Renovator Certification

### Not working Lead-Safe

renovator, no  
containment, or  
no cleaning.

### No Pamphlet Provided

Renovator does not  
provide copy of  
"**Renovate Right**" or  
provide Notice to  
owner/tenants/parents



## Lead-Safe Work Practices: Violations



## Lead-Safe Work Practices: In Compliance



# Lead-Safe Work Practices: In Compliance



4

## CAHCEO & EPA Collaboration

Roles & Responses

## CAHCEO Role & Response

1

### Stop Work

Issue a cease and desist; suggest they clean the site

2

### Collect & Record

Property Owner, Tenants & Contractors

- Name
- Address
- Phone
- Email

3

### Describe Conditions

What kind of renovation? How many units? Kids present? Take photos.

4

### Contact EPA

EPA will follow-up on referrals

[Public Health and Code Officials in CT](#)

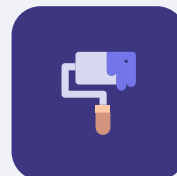


## EPA's Role & Response



### Inspections

Gather information, take photos, & conduct interviews



### Guidance

Review or provide FAQ answers. Assist with use of EPA language.



### Compliance Assistance

Instruct parties to compliance. Provide Outreach information.



### Enforcement

Determine response; Referrals, Case Development

# EPA Contact Information & Hotlines

## Carley Cascione

EPA Region 1 TSCA Lead  
Inspector

Phone: (617) 918-1324

Email: [Cascione.carley@epa.gov](mailto:Cascione.carley@epa.gov)

## Molly Magoon

EPA Region 1 TSCA Lead Enforcement  
Coordinator/Inspector

Phone: (617) 918-1848

Email: [magoon.molly@epa.gov](mailto:magoon.molly@epa.gov)

## Tips/Complaints

### EPA Region 1 Tip Line

617-918-1111, Select Option  
#3, & then #2

### EPA National Lead Hotline

1-888-372-7341

## EPA Region 1 Online Tip Forms:

### Lead Disclosure Rule

<https://www.epa.gov/lead/forms/epa-new-england-lead-based-paint-disclosure-rule-tipcomplaint-form>

### Renovation, Repair, & Painting Rule

<https://www.epa.gov/lead/forms/epa-new-england-lead-based-paint-renovation-repair-painting-rule-tipcomplaint-form>

**Thank  
you!** Questions?



# EPA Region 1 Lead Paint Rules: Outreach Packet

## 1018 Disclosure Rule

- [Protect Your Family from Lead in Your Home Pamphlet](#)
- [Fact Sheet: EPA and HUD Move to Protect Children from Lead-Based Paint Poisoning; Disclosure of Lead-Based Paint Hazards in Housing](#)
- [What You Need to Know About Lead Poisoning](#)
- [Lessor's Disclosure of Information on Lead-Based Paint and/or Lead-Based Paint Hazards](#)
- [Seller's Disclosure of Information on Lead-Based Paint and/or Lead-Based Paint Hazards](#)

## Renovation, Repair & Painting Rule

- [Renovate Right: Important Lead Hazard Information for Families, Childcare Providers and Schools](#)
- [Steps to Lead Safe Renovation, Repair and Painting](#)
- [EPA's Renovation, Repair and Painting Rule Fact Sheet](#)
- [Small Entity Compliance Guide to Renovate Right](#)
- [EPA's Lead-Based Paint Renovation, Repair, and Painting Program](#)
- [U.S. EPA Small Business Resources Information Sheet](#)

[National Lead Hotline 1-800-424-LEAD](#)

[Lead Renovation/Abatement Firm Certification Application or Update](#)

[Locate an RRP Training Class or Provider in your area](#)

[Locate Certified Renovation and Lead Dust Sampling Technician Firms](#)

Click the [hyperlinks](#) to EPA's Website, please select the PDF on EPA'S website to view files online.