

2010 Mandatory Lead-Safety Training and Certification Impacts Home Renovation and Repair Industry

Does your business involve the renovation, repair or painting of structures built before 1978? If so, there are new federal regulations that must be followed in order to protect children from lead-based paint hazards that can result from this type of work. The U.S. Environmental Protection Agency (EPA) issued a new Lead Renovation, Repair and Painting rule (RRP) last April. The rule requires firms and individuals involved in interior and exterior renovation repair and painting to be certified by April 2010 and that they follow specific lead-safe work practices to minimize exposure to lead-based paint dust. As a contractor, you play an important role in protecting public health by helping prevent lead exposure. Ordinary renovation and maintenance activities in older structures can create dust that contains lead—even small amounts of lead can harm children and adults.

EPA's RRP rule impacts many construction trades, including general contractors and special trade contractors, painters, plumbers, carpenters and electricians. Activities performed by all of these trades can disturb lead-based paint and have the potential to create hazardous lead dust. Research has shown that the most common source of lead exposure for children today is deteriorated lead-based paint in older housing and contaminated lead-based paint dust. Renovation and repair activities can create additional significant risks to children when lead-based paint in pre-1978 structures is disturbed. Because children's developing bodies and nervous systems are particularly susceptible to poisoning from lead-based paint, it is especially important that renovation, repair and painting work be performed in a way that minimizes exposure to lead-based paint dust.

Under the rule, beginning in April 2010, contractors performing renovation, repair and painting projects that disturb lead-based paint in homes, child care facilities, and schools built before 1978 must be certified and must follow specific work practices to prevent lead contamination. For most individuals, eight hours of training is required. However, individuals who have successfully completed renovation courses developed by HUD or EPA, or an abatement worker or supervisor course accredited by EPA or an authorized State or Tribal program, can become certified renovators by taking a four hour EPA-accredited renovator refresher training.

Even before the April 2010 requirements take effect, contractors should strive to work lead-safe. Three simple procedures should be followed:

- 1. Contain the work area.** Take steps to seal off the work area so that dust and debris do not escape. Warning signs should be put up and heavy-duty plastic and tape should be used to cover the floors and furniture and seal off doors and heating and cooling system vents.
- 2. Minimize dust.** Use work practices that minimize the dust generated during renovation and repair by using water to mist areas before sanding or scraping; scoring paint before separating components; and prying and pulling apart components instead of breaking

them. Dangerous practices such as open flame burning or torching and using power tools without HEPA vacuum attachments are prohibited by the rule because they generate large amounts of lead-contaminated dust.

3. Clean up thoroughly. Work diligently every day to keep the work area as clean as possible. When all the work is done, the area should be cleaned up using special cleaning methods including the use of a HEPA vacuum and wet mopping.

Although the rule will not be fully implemented until April of 2010, certain elements are required now, and others require attention well before April 2010.

- Effective now – Contractors that disturb paint in homes, residential buildings, schools and child care facilities built prior to 1978 must provide lead hazard information prior to the start of the job to building owners, occupants, and to the families of children using the facilities by distributing EPA’s new *Renovate Right* brochure, (*Renovate Right* is available at www.epa.gov/lead/pubs/renovaterightbrochure.pdf).
- April 2009 – Trainers can begin to apply to EPA or an EPA-approved state for accreditation, and, once approved, contractors and construction trade workers can begin to take the training to become certified.
- October 2009 – Firms can apply for EPA or state certification.
- April 2010 – All businesses engaged in renovation, repair or painting activities in homes, residential buildings, schools and child care facilities built prior to 1978 must be certified, use certified workers, and follow specific lead-safe work practices to prevent lead contamination.

EPA encourages all businesses affected by the rule to begin preparing to become trained and certified as lead-safe firms as soon as possible. Not only will you be doing your part to protect our country’s children, but you will be providing your customers with an improved service. Noncompliance can result in significant monetary penalties. A firm may also be exposed to legal liability if a child comes into contact with lead-based paint dust or suffers lead poisoning as a result of a firm not following lead-safe work practices. EPA has prepared a compliance guide for contractors and construction trade workers which details all of the requirements of this new rule. The guide is available at www.epa.gov/lead/pubs/sbcomplianceguide.pdf.

If you have questions about the Lead Renovation, Repair and Painting rule’s requirements or lead poisoning prevention in general, please visit EPA’s Web site at www.epa.gov/lead or contact the National Lead Information Center (NLIC) at **1(800) 424-LEAD [5323]**.