

# The Renovation, Repair and Painting Rule

Common renovation activities like sanding, cutting, and demolition can create hazardous lead dust and chips by disturbing lead-based paint, which can be harmful to adults and children.

On April 22, 2008, EPA issued a rule requiring the use of lead-safe practices and other actions aimed at preventing lead poisoning. 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. Until that time, HUD and EPA recommend that anyone performing renovation, repair, and painting projects that disturb lead-based paint in pre-1978 homes, child care facilities and schools follow lead-safe work practices.

There are some differences between the EPA RRP Rule and the HUD Lead Safe Housing Rule (LSHR). A major difference is that the LSHR requires clearance examinations. All housing receiving federal assistance must still comply with the LSHR. OHHLHC provides Information on complying with the LSHR and RRP, and Frequently-asked Questions from Grantees. Additional information for renovators is available.

All contractors should follow these three simple procedures:

- Contain the work area.
- Minimize dust.
- Clean up thoroughly.

From December 2008, the rule has required that contractors performing renovation, repair and painting projects that disturb lead-based paint provide to owners and occupants of child care facilities and to parents and guardians of children under age six that attend child care facilities built prior to 1978 the lead hazard information pamphlet *Renovate Right: Important Lead Hazard Information for Families, Child Care Providers, and Schools*.

Starting on April 22, 2010, the rule will affect paid renovators who work in pre-1978 housing and child-occupied facilities, including:

- Renovation contractors
- Maintenance workers in multi-family housing
- Painters and other specialty trades.

Under the rule, child-occupied facilities are defined as residential, public or commercial buildings where children under age six are present on a regular basis. The requirements apply to renovation, repair or painting activities. The rule does not apply to minor maintenance or repair activities where less than six square feet of lead-based paint is disturbed in a room or where less than 20 square feet of lead-based paint is disturbed on the exterior. Window replacement is not minor maintenance or repair.

## Effective Dates of the Rule

**June 23, 2008** Unaccredited renovator or dust sampling technician training programs may not advertise or provide training leading to EPA certification.

States, Tribes, and Territories may begin to apply for authorization.

Persons performing renovations for compensation in pre-1978 child-occupied facilities (e.g., child care facilities, kindergarten and pre-kindergarten classrooms) must provide **either** *Protect Your Family* **or** *Renovate Right* to the owners and occupants before beginning renovations.

Modifications/exemptions to Pre-renovation Education Rule take effect:

- 1) Minor repair and maintenance exception changes to < 6 ft<sup>2</sup> per room for interiors, 20 ft<sup>2</sup> for exteriors. To qualify, the project cannot involve the use of high dust generating (“prohibited”) practices or window replacement.
- 2) Emergency renovations specifically include interim controls performed in response to an elevated blood lead level in a child.
- 3) Persons performing renovations for compensation in pre-1978 housing **may use either** *Protect Your Family* **or** *Renovate Right* to comply with the existing requirement to provide a lead hazard information pamphlet to the owners and occupants of target (pre-1978) housing before beginning renovations.

**December 22, 2008** Persons performing renovations for compensation in target (pre-1978) housing or child-occupied facilities **must provide** *Renovate Right* to the owners and occupants before beginning renovations

**April 22, 2009** Training providers may begin applying to EPA for accreditation to provide renovator or dust sampling technician training

Persons seeking certification as renovators or dust sampling technicians may take accredited training as soon as it is available

**October 22, 2009** Firms may begin applying to EPA for certification to conduct renovations

**April 22, 2010** Renovations in target (pre-1978) housing and child-occupied facilities must be conducted by certified renovation firms, using renovators with accredited training, and following the work practice requirements of the rule

**Jim Bartlett**, owner and founder of *A Master’s Hands, LLC* is an EPA Certified Renovator, and able to comply with all regulations related to renovation of target homes (pre-1978), including the ability to test for the presence of lead-based paint. We were one of the first contractors in Colorado to obtain this required certification, and are able to provide safe renovation services to our clients in older homes or commercial properties. Please contact us regarding any renovations, repairs or painting projects you’re considering and we’ll be glad to discuss them with you and provide estimates for the work required.

A Master’s Hands is the Affordable Handyman Services company in the metro Denver area, serving clients from Erie to Castle Rock and from Aurora to Georgetown. We’re fully licensed, bonded and insured, and strive to maintain a 100% client satisfaction track record.



**Source:** U.S. Department of Housing and Urban Development (HUD), and the U.S. Environmental Protection Agency (EPA). To Read EPA's Lead Renovation, Repair and Painting Program Rule, or for additional information on becoming an EPA-certified renovator or training provider, visit EPA's Renovator and Trainer Tool Box site.