

## Fact Sheet

# EPA's Lead Renovation, Repair and Painting Program

## Certified Training

EPA's Lead Renovation, Repair and Painting Program (LRRP) requires contractors, property managers and in-house maintenance staff that disturb lead-based paint in homes or child-occupied facilities (child care centers, daycares, schools) built prior to 1978 to be EPA or state certified and trained to follow specific work practices that prevent lead contamination. Sanding, cutting, window and door replacement, electrical work, plumbing and renovation are some of the many jobs that apply to the LRRP.

In Iowa, an eight hour EPA-approved course covering lead-safe renovation is required for anyone performing work for compensation. If such a course has already been taken, a four hour refresher course is required. Once the course is completed, the individual applicant must fill out a certification form with a \$60 fee included.

If a firm or company works with painted surfaces, the firm must be certified and one certified lead-safe renovator must be assigned to each job. The renovator certified in lead-safe practices for the firm must train other renovators working on each job. There is no fee for a firm to be certified.

A list of training opportunities in the state of Iowa can be located at the following calendar through the Bureau of Lead Poisoning Prevention, Iowa Department of Public Health at [www.idph.state.ia.us/LPP/Calendar.aspx](http://www.idph.state.ia.us/LPP/Calendar.aspx).

## Lead Based Paint Testing

According to LRRP, a renovator must assume lead paint is present unless testing is done prior to beginning any job to determine all surfaces affected by the renovation are lead-free. Surfaces that need to be tested include paint covered wallpaper, shellac, varnish, stain, and painted plaster, drywall and all other paint coated surfaces.

There are two options for testing.

1. Use one of three lead test kits that have been approved by the EPA. These EPA test kits are listed at [www2.epa.gov/lead/epa-recognition-lead-test-kits](http://www2.epa.gov/lead/epa-recognition-lead-test-kits).
2. Hire a certified lead-based paint inspector or lead-based paint risk assessor. These professionals will send paint samples or chips to a laboratory for analysis or will operate an X-Ray Fluorescence Analyzer to measure the amount of lead in the paint.

Although the lead test kits are on the lower side of accuracy in determining the presence of lead, they are less expensive and results are almost instant when compared to laboratory analyses and X-Ray Fluorescence analyses.

## Lead Risks

Lead-based paint has been banned from household paints in the United States since 1978. Any structure painted prior to 1978 may have lead-based paint that requires careful handling when remodeling, deconstructing or demolishing. According to the United States Environmental Protection Agency (EPA) approximately 3/4 of housing built prior to 1978 contain some lead-based paint.

Lead-based paint in the form of dust or paint chips can enter the body through breathing or ingesting and it is most harmful to children six and younger often times displaying no symptoms. According to the Centers for Disease Control and Prevention (CDC), 500,000 children in the United States between the ages of 1-5 have elevated blood lead levels (EBL).

While lead poisoning can cause permanent damage and affect every system in the body including the developing nervous system and brain, it is highly preventable. The CDC recommends all children get a simple and inexpensive blood lead level test. Early detection of EBL can reduce the risk of permanent damage when treated with medication to remove the lead from the body.



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## Required Tasks per Project

The certified lead-safe renovator must complete the following tasks during each job:

- Have the most recent lead course certificate on-site
- Be available at all times by telephone or on-site during renovations
- Test all surfaces affected by the job for lead or assume all surfaces contain lead
- Post signs warning occupants not to enter work areas
- Contain any dust and debris to the work area
- Cover floors and any furniture that cannot be moved
- Seal off doors and heating/cooling system vents
- Contain, store, and transport waste material safely
- Work area must be cleaned on a daily basis
- Work area must pass post-renovation cleaning verification or clearance testing with dust samples
- Record and document lead testing, pamphlet distribution and any compliance with the requirements of LRRP and retain for three years

## Pre-Renovation Education

LRRP also requires pre-renovation education in which the certified lead-safe renovator distributes a pamphlet about lead to the owner and occupants before starting work.

- EPA's *The Lead-Safe Certified Guide to Renovate Right* pamphlet contains important lead hazard information for families, child care providers and schools. It can be found at [www2.epa.gov/sites/production/files/documents/renovaterightbrochure.pdf](http://www2.epa.gov/sites/production/files/documents/renovaterightbrochure.pdf).
- The Iowa Department of Public Health's Lead Poisoning Prevention Program developed a publication titled *Lead Poisoning: How to Protect Iowa Families* which explains the laws, hazards and safety information. This document can be found at [www.idph.state.ia.us/LPP/common/pdf/protect\\_iowa\\_families.pdf](http://www.idph.state.ia.us/LPP/common/pdf/protect_iowa_families.pdf).

## Post-Renovation Cleaning

The certified renovator must perform a verified post-renovation cleaning which includes a visual inspection by the certified renovator to ensure dust, debris and residue is absent and has been properly cleaned. For interior projects, the certified renovator must wipe floors and other surfaces affected by dust and debris from the project and then compare the cloth with an EPA-provided cleaning verification card to determine if the area has been properly cleaned. Cleaning verification can only be performed by a certified renovator. Call EPA's National Lead Information Center at 1-800-424-LEAD (5323) to receive cleaning verification cards.

The post-renovation cleaning requirement changes if there is a child that has an EBL. In this instance, the post-renovation cleaning verification cannot be utilized. Instead, the post-renovation cleaning must be done by an EBL inspector/risk assessor who must be certified as a lead safe renovator, lead abatement worker or lead abatement contractor within six months of the EBL inspection.

## Exceptions to the Rule

LRRP has some exceptions to the rule where LRRP does not apply.

- Lead abatement by a certified lead abatement contractor
- Surfaces where there is no lead-based paint
- Property owners doing their own renovations on their own residence where they live
- Minor repair or maintenance activities as follows but does not include window replacement or demolition:
  - Disturbed areas that are less than 6 square feet per room
  - Disturbed areas that are less than 20 square feet of an exterior project

# U.S. Department of Housing and Urban Development Housing

HUD has its own set of rules, called the Lead Safe Housing Rule, to enhance the LRRP rule where federally assisted housing is concerned. HUD's rule does not include child occupied facilities outside of residential housing.

HUD does not allow the following:

- A certified renovator to use lead test kits. Instead HUD requires certified renovators to hire a certified lead-based paint inspector or a lead based-paint risk assessor that will conduct an investigation in all surfaces and then send samples to a laboratory or use an X-Ray Fluorescence Analyzer to identify where lead-based paint is present.
- On-the-job-training when renovations are necessary in federally assisted housing. All workers must have finished HUD approved courses or all workers must be supervised by a certified renovator who also has the credentials of a certified lead abatement supervisor.

HUD requires dust clearance testing rather than cleaning verification in any home built before 1978. Clearance testing is conducted by a certified lead-based paint inspector or risk assessor or a lead dust sampling technician and must be conducted by an independent person not affiliated with the renovation firm. This is done by sampling the floor in each room renovated and acquiring another sample from the floor outside the entry of the work area as well as sampling window sills and troughs in the renovated space. The samples are sent to an EPA-recognized dust-lead laboratory for analysis.

HUD's rule exempts renovation areas that are less than

- 2 square feet interior
- 20 square feet exterior
- 10% of all surface area of small building



## Penalties

The EPA has delegated authority to file an enforcement action against violators of the LRRP rule and may seek up to \$37,500 per violation per day. Variables to the penalty include the severity of violation, the ability of the violator to pay and the economic benefit obtained by the violator.