

# Lead-Based Paint Renovation, Repair, and Painting

Michigan – Contractor, Risk Assessor and  
Trainer Workshop-8/4/2011



## Where does it apply?

- Applies to renovations of:
  - Target housing.
  - Child occupied facilities.
- Excludes:
  - Renovations that affect only components determined to be free of lead-based paint.
  - Activities that disturb under 6 ft<sup>2</sup> interior or 20 ft<sup>2</sup> exterior (this excludes window replacement, demolition, and projects involving prohibited practices).
  - Work done by individuals in housing they own and occupy.

# What does it require?

- Accreditation of training providers.
- Certification of firms, **PLUS** renovators, and dust sampling technicians.
- Work practice standards.
- Pre- Renovation disclosure to Renovate Right booklet.



# Firm Responsibilities

- Ensure all individuals performing renovation activities are appropriately trained.
- A certified renovator is assigned to each renovation.
- All renovations are performed in accordance with the lead-safe work practice standards.
- Comply with pre-renovation education requirements prior to starting the work.
- Ensure the recordkeeping requirements are met.

# Renovator Responsibilities

## Work Practice Standards

- Perform or direct work to ensuring the work practices are followed.
- Be physically present at the work site:
  - When warning signs are posted, while containment is established, and during final work area cleaning.
  - Be available, either on-site or by telephone, at all other times.
- Provide on the job training to uncertified workers.
- When **requested**, use a test kit to determine if LBP is not present.
- Perform cleaning verification.
- Prepare required records.

# Enforcement

- EPA, Authorized States, or Tribes, may suspend, revoke, or modify a firm's certification if found to be in non-compliance.
- Non-compliant contractors may be subject to civil and criminal penalties up to \$37,500 for each violation, imprisonment, or both.
- Michigan and EPA have jointly reviewed over 100 applications, visited about 20 job sites and are determining if further remedies are required.



# Recordkeeping

- Documents demonstrating RRP compliance must be retained for 3 years following completion of renovations. Documents include: **Signed pamphlet receipts, work practices documentation and on-the-job training verification.**

# State/Tribal Program Authorization

- RRP is a delegable program.
- Programs must be at least “as protective as” EPA requirements, and have “adequate enforcement.”
- Reciprocity will be encouraged.
- To date 9 states are authorized to administer and enforce an RRP program (Wisconsin, Iowa, North Carolina, Mississippi, Kansas, Rhode Island, Utah, Oregon and Massachusetts).

# Information Resources

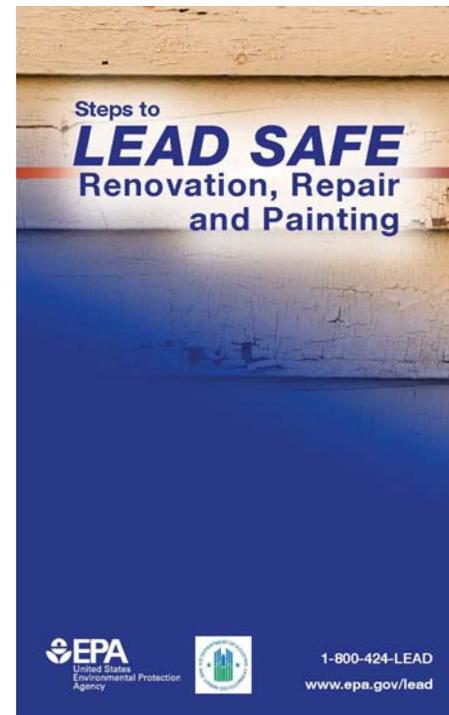
## Lead Websites

- [www.epa.gov/lead](http://www.epa.gov/lead) - Main site for information regarding lead and lead hazards.
- [www.epa.gov/getleadsafe](http://www.epa.gov/getleadsafe) - Information specific to the RRP program.
- [www.epa.gov/lead/pubs/lscp-renov-materials.htm](http://www.epa.gov/lead/pubs/lscp-renov-materials.htm) - RRP brochures and materials.
- [http://toxics.custhelp.com/cgi-bin/toxics.cfg/php/enduser/std\\_alp.php](http://toxics.custhelp.com/cgi-bin/toxics.cfg/php/enduser/std_alp.php) - Searchable frequent questions page. You can submit your own questions here.

# Information Resources

## Steps Brochure

- A guide to lead-safe renovation, repair and painting.
- Covers basic lead-safe practices.
- Can be used as a training guide for on-the-job training.



# Information Resources

## Renovation Recordkeeping Checklist

**Sample Renovation Recordkeeping Checklist**

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

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

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

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

Number of Trained Workers, if any: \_\_\_\_\_

Name of On-Site Sampling Technician, Inspector, or Risk Assessor, if any: \_\_\_\_\_

Copies of renovation 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
  - Isolating removal of dust to adjacent areas
  - Waste handling
  - Post-renovation cleaning
- Test kits used by certified renovator to determine whether lead was present at components affected by renovation (identify kits used and describe sampling techniques and results): \_\_\_\_\_

Warning signs posted at entrance to work area.

Work area contained or properly sealed off from dust and debris:

- A 6-foot high barrier, tarp, or other enclosure or covered structure
- JMWAC doors in the work area closed and sealed (interlock)
- Windows in and within 75 feet of the work area closed (interlock)
- Doors in the work area closed and sealed (interlock)
- Doors in and within 25 feet of the work area closed and sealed (interlock)
- Doors that were to be used in the work area covered to allow passage but prevent spread of dust
- Floors in the work area covered with sand/dust-free plastic sheeting
- Ground covered by plastic extending 10 feet from work area - plastic anchored to building and weighted down by heavy objects (interlock)
- If necessary, vertical containment installed to prevent migration of dust and debris to adjacent property (interlock)

Waste contained inside and while being transported off-site.

Work site properly cleaned after renovation:

- All chips and debris packed up, progressive cleaning wheel, folded dirty side toward, and taped for removal
- Work area surfaces and objects cleaned using HEPA vacuum and/or wet cloth or sponge (interlock)

Certified renovator performed post-erase alone cleaning verification (describe results, including the number of wet and dry cloth tests): \_\_\_\_\_

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: \_\_\_\_\_

# Suggestions for using Renovation Recordkeeping Checklist

- [http://www.epa.gov/lead/pubs/sample checklist.pdf](http://www.epa.gov/lead/pubs/sample%20checklist.pdf)
- Put Certified Firm Logo and info on back of form.
- Go over list and leave copy when doing disclosure.
- Use as a Marketing Tool- Stress Added Value.
- After job is done, go over checklist with customer.

# Changes to RRP which May Affect Contractors

- Visual Cleaning Verification procedures remain in force.
- If Clearance is required, firms may skip Cleaning Verification.
- Paint chip samples may be used in lieu of Test kits, must be sent to NLLAP lab.
- Vertical containment methods broadened.

## How is it going?

- **Nationally** a/o 7/6/2011- Over 108,000 Approved Firms.
- Over 690,000 Certified Renovators.
- **Michigan**, a/o 7/6/2011- over 4,000 Approved Firms.
- Over 42,000 Certified Renovators( 3<sup>rd</sup> in US).

## Contact Info

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