

Contractors, Painters and Landlords Cheat Sheet for lead safe renovations (RRP records and inspection checklist)

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This list is created in part from our knowledge of the rules, our conversations with contractors, landlords and EPA officials, and in part from actual EPA inspection documents. Stick to this list, do EVERYTHING on it, and you will do well in an EPA inspection or audit. Don't be afraid – just be careful! **

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Inspections, classes, project management,

save money – call us first

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**Disclaimer – this information is taken from the RRP course material and conversations with EPA inspectors. Kate Kirkwood and Lead-Edu do not work for the EPA and do not offer legal advice. Questions? Contact us at www.kkirkwood.com kate@kkirkwood.com 603-781-4304

First –know your exclusions.

The rule does not apply to you if:

- a) The house was built after 1978,
- b) The commercial building is not child occupied.
- c) It is a lead abatement project
- d) There is no lead based paint in your work area,
- e) The renovation is an emergency
(flood, fire, etc- but it still applies to cleaning, cleaning verification and record keeping)
- f) The repair is minor (not windows, demolition, or prohibited practices).
Minor means less than 6 square feet in any one room (2 square feet if it's a HUD project).
- g) The Property is a zero bedroom dwelling,
studio or efficiency, hotel room, college dorm, boarding house etc
- h) The property is a senior citizens complex
- i) The renovations were performed by the owner in his/her own primary residence

If you have an exclusion as listed above, just
start a file for the project,
explain your exclusion,
close the file
and your RRP recordkeeping is done.

There are three types of requirements you need to understand to comply with RRP regulations.

1) Information distribution requirements

You Must....

- Provide the *Renovate Right* pamphlet to owner and adult occupants of a dwelling unit. Need copies? Go to
 - <http://www.lead-edu.info/brochures.html>
- Provide written notification to tenants of affected units and/or post signs generally describing renovation work in common areas of multi-unit target housing or to parents and guardians or post signs generally describing renovation work in child- occupied facilities.
- Provide necessary written acknowledgments for pamphlets and/or provide sufficient written notices. (meaning you have the signature page or an explanation as to why you don't such as "unavailable for signature" checked on the signature page, along with the dates and times you tried to get a signature)

2) Work Place Standards Requirements

To Comply with *Interior* Containment Standards, You Must.....

- Post proper warning signs that clearly define the work area and restrict non- worker access to the work area.
- Properly keep dust and debris from contaminating adjacent areas.
- Set up proper interior containment
 - Remove or cover furnishings and belongings in work area with plastic sheeting (no specific thickness) sealed with water proof tape
 - Close door(s) and window(s) within the work area. Seal with plastic and tape.
 - Cover door(s) in work area with plastic sheeting to allow workers to pass through, but still confine dust and debris
 - Turn off HVAC systems, or cover vents with plastic and tape
 - Cover floors with plastic sheeting 6 feet in all directions from the work area

To Comply with *Exterior* Containment Standards, You Must.....

- Close windows and doors within 20 feet of the area undergoing renovation, seal with plastic and tape
- Cover door(s) in work area with plastic sheeting to allow workers to pass through, but still confine dust and debris

- Cover the ground with plastic sheeting 10ft in all directions from the area undergoing renovations
- Use vertical containment if you are within 10 feet of the property line, to ensure that dust and debris did not spread or get tracked out to adjacent areas.

Prohibited Practices - You Must *Not*....

- Use an open flame or torch to remove paint during renovations
- Use a heat gun operating over 1100⁰
- Use a power tool to remove or disturb paint (e.g. Sander, grinder, power planer, power washer, needle gun, abrasive blaster or sandblaster) without attachment to a HEPA vacuum

*HUD has additional prohibitions, refer to your manual
or contact us for details*

Handling Waste – You Must.....

- Keep waste properly contained and securely stored under containment or covered daily during the renovations.
- Properly dispose of waste to prevent the release of dust and debris.
- Properly dispose of waste water. (in the toilet)

How Clean is Clean? You Must.....

- Properly clean the work area after the renovation until no dust, debris, chips or residue remained.
- Clean up any remaining paint chips, debris, residue from and/or immediately adjacent to work area. You may NOT use any vacuum that is not a HEPA VAC (99.97% effective at .3 microns AND a sealed unit – NOT a shop vac with a HEPA filter) No brooms, leaf blowers, rakes or mops, no sponges or reusable cloths. Disposable rags and Hepa Vacs only!
- Wet mist and properly dispose of plastic sheeting in heavy-duty plastic bag or tape completely wrapped with contaminated areas inside the bundle.
- Properly clean vertical surfaces in and 2 ft beyond the work area with a HEPA vacuum or disposable damp cloth/towel (Interior only).
- Clean furnishings and belongings that had been covered with plastic sheeting with a HEPA vacuum and/or disposable damp cloth/towel (Interior only).
- Clean carpeted floors in and 2 ft beyond the work area with a HEPA vacuum that is equipped with a beater bar (Interior only).
- Clean uncarpeted floors in and 2 ft beyond the work area with both a HEPA vacuum and disposable cloth. Although EPA allows a 2-bucket mopping system. WE CANNOT RECOMMEND IT (*particularly if you are going to have to pass a dust wipe, as in HUD projects*) (Interior only).

3) Record Keeping Requirements

For a period of three years - You Must....

- Document that the work done by a firm (company) who is EPA/HUD Certified and follows these rules
 - Need a firm certification? Go to this website
<https://www.epa.gov/lead/lead-renovationabatement-firm-certification-application-or-update>

- Document that work was completed by an EPA/HUD Certified Renovator, and workers trained by this person.
 - Need to certify a renovator? Classes listed here:
<http://www.lead-edu.info/upcoming-trainings.html>

- Show proof of a Post Renovation Report (log book of activities) provided upon completion of renovations to property owner and/or adult occupant, or posted or made available to tenants if in multi-unit target housing or to parents and guardians if in a child-occupied facility.

- Document that the EPA Certified Renovation Firm certificate was on site AND the certified renovator's certificate was on site at all times.

But Wait - There's More!

In addition to the above checklist, if you have an on-site audit, the EPA inspector will be looking for:

- A HEPA Vac (99.97% effective at .3 microns and a sealed unit)
Power tools –must have an attachment directly into the VAC or they cannot be used

- Waste Chutes must be covered, dumpsters and trash must not be accessible to occupants
- There can be no open flame or torches to remove paint and no heat guns about 1100 degrees
- There must be evidence of lead testing, or testing forms filled out indicating the choice to “presume” and that results were provided to the owner and occupant within 30 days of the end of the renovation.
- If testing occurs the type of kit and locations tested must be documented in writing
- Signed Renovate Right signature pages, or evidence of mailing them, or attempted delivery
- Evidence of notification of availability of pamphlet to common areas and child occupied facility
- Copies of the renovator certification and the firm certification on the job site
- Evidence that the certified renovator provided training if needed for uncertified workers
- Record of cleaning verification or dust sampling on each job
- Evidence of a certified renovator assigned to each job
- Documentation that warning signs were used (pictures are fine)
- Documentation of non-certified worker training (forms filled out)
- Documentation of containment (pictures are fine)
- Documentation that waste was contained on site and during transport
- Documentation of post renovation cleaning
- Documentation of cleaning verification or dust sampling
- Documentation that the information in the post renovation report (log book) went to the owners, occupants or other customers

Questions about Lead Paint?

We've Got Answers!!!

Your Checklist

- _____ RRP certified firm?
- _____ RRP certified renovator?
- _____ Both above certificates on job site?
- _____ Is there an exclusion? *If so, which one?*
 - _____ no lead paint in the work area,
 - _____ lead abatement project,
 - _____ emergency,
 - _____ minor repair (less than diminimus),
 - _____ zero bedroom dwelling,
 - _____ senior citizens complex,
 - _____ performed by home owner in their primary residence
- _____ House built before 1978?
- _____ If Commercial, is the building “child occupied”?
- _____ Workers trained by Certified Renovator?
 - _____ Training Documented?
- _____ Certified Renovator tested for lead or assumed?
- _____ Lead testing form, records & info provided to occupants and owner?
- _____ *Renovate Right* provided to owner and occupant
- _____ *Renovate Right* Signature pages filled out correctly if not signed
(refused or unavailable attempts documented and dated)
- _____ *Renovate Right* made available in common areas?

- _____ Warning signs in place and information available about renovation?
- _____ Signs restrict access?
- _____ Containment in place to keep dust and debris from contaminating
- _____ Remove objects from work area and cover what you cannot move?
- _____ Close and seal windows and doors?
- _____ Cover floors?
- _____ Set up work entry doorway?
- _____ Exterior - close windows and doors within 20 feet perimeter?
- _____ Signs and visual barrier 20 feet from work area?
- _____ Cover ground with plastic 10 feet in all directions from work area?
- _____ Vertical containment if within 10 feet of the property line?
- _____ NO open flame or torch used to remove paint?
- _____ NO heat gun above 1100 degrees used to remove paint?
- _____ NO power tools that remove paint unless attached to a HEPA?
- _____ Was waste properly contained and securely stored?
- _____ Properly dispose of waste? (where and how documented)
- _____ Properly dispose of waste water? (toilet)
- _____ Properly clean work area? (disposable rags, HEPA vac)
- _____ Clean 2 ft beyond work area?
- _____ Beater bar on carpet?
- _____ Cleaning verification or dust wipe?
- _____ Post renovation report?
- _____ Made available to owner and occupant?

Congratulations! You are working Lead Safe and protecting yourself, your workers, your family, your clients, your neighbors, and the children you and they love.