# Attention: Public Health & Code Officials **EPA's RENOVATION, REPAIR and PAINTING (RRP) RULE**

#### FEDERAL REGULATIONS

EPA's Region 1 Lead-based Paint Program operates in the six New England States and 10 Tribal Nations working in concert with our state and tribal partners.

Our mission is to reduce childhood lead exposure through increased awareness of and improved compliance with federal lead-based paint regulations. We enforce two main lead paint regulations: the Renovation, Repair and Painting Rule and the Lead Disclosure Rule.

The six New England states enforce lead abatement regulations. https://www.newenglandlead.org/

\*EPA does not endorse any external non-government websites, companies or applications.

# WHO MUST COMPLY?

- Home improvement remodelers
- Contractors
- Landlords or property managers
- Maintenance staff
- Childcare facility owners
- Window and door replacement firms
- Carpenters
- Electricians and plumbers
- Anyone else disturbing paint for compensation in pre-1978 target housing and child occupied facilities.

#### WHAT IS THE RRP RULE?

- The RRP Rule prevents lead-based paint hazards from being created by renovation, repair and painting activities for compensation that disturb lead-based paint in pre-1978 target housing and child occupied facilities.
- The RRP Rule requires firm (company) certification, renovator certification, pre-renovation education, the use of lead safe work practices and record keeping.
- It does not include lead abatement. Lead abatement is a specialized activity focusing on permanently eliminating lead hazards in the home. The six New England states regulate their lead abatement programs.

## **EXEMPTIONS**

- Project area documented to be free of lead-based paint
- Activities that disturb less than or equal to 6 ft<sup>2</sup> interior or 20 ft<sup>2</sup> exterior surfaces (not counting window replacement, partial demolition, and projects involving prohibited practices)
- Work done by individuals in housing they own and only they occupy
- Work in which no compensation is received
- Total demolition of a structure
- Lead abatement

#### HOW EPA CAN HELP YOU

- Provide links to information (example: EPA Region 1 RRP Rule Fact Sheet; brochures, posters, flyers, etc.) Limited hard copies are available
- Provide general training or guidance on RRP Rule for staff by request
- Review or provide template RRP Rule language for websites, building permit guides, FAQ sheets, applications, codes
- Discuss lead issues or lead regulations with other city officials

# WHAT ARE SOME LEAD-SAFE RENOVATION PRACTICES?

- Laying down plastic to contain the work area to prevent dust and debris from leaving the work area.
- Prohibition of certain work practices like open-flame burning and the use of power tools without High Efficiency Particulate Air (HEPA) exhaust control.
- Thorough clean-up followed by a verification procedure to minimize exposure to lead-based paint hazards.



#### HOW LOCAL HEALTH AND CODE OFFICES CAN HELP

If you observe non-compliance and the property is confirmed to have been built before 1978, here are some things you can do that would aid EPA:

- Record the address of the worksite and a description of the work, especially whether or not the regulated amount of painted surfaces is being disturbed—more than 6 ft² of interior or 20 ft² of exterior surfaces.
- Record both the property owner's and occupants' name(s) and contact information.
- Record the name and contact information of the contractor(s) present at the worksite. Even a phone number observed on a truck or sign will help. Take photos of all license plate numbers of trucks present at worksite.
- Note if any children reside at the property, and their ages—especially children 6 years old or younger.
- Take photos of the worksite and focus on possible noncompliance issues. Document any unsafe lead work practicespaint chips on ground or floor; no plastic containment; no lead warning signs; use of electric sanders without HEPA shrouds; shop vacuums used instead or required HEPA vacuums.
- If you are certified as a lead inspector/risk assessor, please take any appropriate samples that may assist in the investigation. Taking pictures of nuisances that have been created, i.e., paint chips, paint dust, are highly encouraged, along with dust wipes.
- If you deem the work practices to be in violation of local law or regulations, use the authority you deem appropriate to protect the residents/neighbors from exposure to lead-based paint. If appropriate, refer the matter to EPA. An EPA inspector will follow up with the homeowner, contractors and code/health office on referrals.

#### EPA CONTACTS

Region 1 TSCA Lead Paint Enforcement Coordinator: Molly Magoon magoon.molly@epa.gov 617-918-1848

Region 1 TSCA Lead Paint Program Coordinator:

Jennifer Shoemaker shoemaker.jennifer@epa.gov 617-918-1758

**EPA Region 1 Call Center:** 

617-918-1111 (dial 3 then dial 2); or National Lead Hotline: 1-800-424-LEAD

### HOW TO SUBMIT A TIP OR REFERRAL TO EPA

If you see a potential RRP violation in your home or community, submit a tip online to EPA Region 1.



SCA

https://www.epa.gov/lead/forms/epa-new-england-lead-based-paint-renovation-repair-painting-rule-tipcomplaint-form

#### Lead Disclosure:

RRP:

https://www.epa.gov/lead/forms/epa-new-england-lead-based-paint-disclosure-rule-tipcomplaint-form

#### **Further Reading:**

https://nchh.org/2021/02/how-municipalities-can-leverage-rrp-requirements-to-advance-lead-poisoning-prevention/ \*

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#### HOW TO BECOME A CERTIFIED RENOVATOR

To find RRP Rule training, visit: <a href="www.epa.gov/lead">www.epa.gov/lead</a> and click on "Locate a RRP training class or provider" link to complete a search for upcoming training near you.

Search for Certified Firms:

https://cfpub.epa.gov/flpp/pub/index.cfm?do=main.firmSearch

Become a Certified Firm: <a href="https://www.epa.gov/lead/getcertified">https://www.epa.gov/lead/getcertified</a>