



## **U.S. Environmental Protection Agency (EPA) Lead Renovation, Repair and Painting Rule (LRRP)**

### **Background**

The objective of the EPA's Lead; Renovation, Repair and Painting rule (LRRP) is to protect against lead-based paint hazards associated with renovation, repair and painting activities. The regulatory program requires workers to be trained to use lead-safe work practices and requires renovation firms to be EPA-certified.

### **Effective date**

Training, certification and work practice requirements became effective April 22, 2010. However, on June 18, 2010 the EPA decided that due to difficulties in obtaining certification for firms and renovators, the rules surrounding firms will not take effect until October 1, 2010 and the rules surrounding renovators will not take effect until January 1, 2011 as long as renovators have registered for a certification class by October 1, 2010.

### **Does this impact re-siding jobs?**

Yes, the rules apply to homes, child-care facilities and schools built before 1978 that contain lead paint.

Projects that are exempt from these rules include:

- Housing built in 1978 or later.
- Housing for elderly or disabled persons, unless children under six reside or are expected to reside there.
- Zero-bedroom dwellings (studio apartments, dormitories, etc.).
- Housing or components declared lead-free by a certified inspector or risk assessor.
- Minor repair and maintenance activities that disturb six square feet or less of paint per room inside, or **20 square feet or less on the exterior of a home or building**.

### **What does it mean for the installation contractor?**

Firms must be certified and renovators must be trained if they work on qualified projects. To become a certified renovator an individual must successfully complete an eight-hour initial renovator training course offered by an accredited training provider (training providers are accredited by EPA, or by an authorized state or tribal program). The course completion certificate serves as proof of certification.

- Lead-safe work practices must be followed. Examples of these practices include:
  - Work-area containment 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 HEPA exhaust control.

- Thorough clean-up followed by a verification procedure to minimize exposure to lead-based paint hazards.
- On May 6, 2010 the EPA amended the LRRP rule and removed a provision that allowed homeowners to authorize their contractors to “opt-out” of using the lead-safe work practices based on specific criteria. The “opt-out” rule was eliminated with an effective date of July 6, 2010.

**What are the general requirements for an exterior renovation (i.e. re-siding)?**

- Close all doors and windows within 20 feet of the renovation.
- Ensure that doors within the work area that will be used while the job is being performed are covered with plastic sheeting in a manner that allows workers to pass through while confining dust and debris.
- Cover the ground with plastic sheeting, or other disposable impermeable material, extending a minimum of ten feet beyond the perimeter or a sufficient distance to collect falling paint debris, whichever is greater.
- In situations where work areas are in close proximity to other buildings, in windy conditions, etc., the renovation firm must take extra precautions to contain the work area, like vertical containment.
- After the renovation has been completed, the firm must clean the work area until no dust, debris or residue remains. The firm must:
  - Collect all paint chips and debris, and seal it in a heavy-duty bag.
  - Remove and dispose of protective sheeting as waste.
  - Transport renovation waste in a contained manner to prevent release of dust and debris.

In addition, firms performing renovations must retain and, if requested, make available to EPA, all records necessary to demonstrate compliance for a period of three years following completion of the renovation. This three year retention requirement does not supersede longer obligations required by other provisions for retaining the same documentation, including any applicable State or Tribal laws or regulations.

**What does it mean for vinyl siding manufacturers?**

Manufacturers should be aware of these rules, but this issue is clearly related to on-site work practices and is neither a manufacturing nor distribution issue, nor is it specific to the installation of vinyl or other polymeric siding. These rules apply to all types of renovations and are about containment, clean-up and consumer education and awareness. Several vinyl siding manufacturers are having their employees certified so that they can assist their customers.

**Additional Information**

For additional information on these rules use the following link:

<http://www.epa.gov/lead/pubs/renovation.htm>

For training use the following link: [www.epa.gov/lead/pubs/trainingproviders.htm](http://www.epa.gov/lead/pubs/trainingproviders.htm)