

Lead Renovation, Repair and Painting  
Program Rulemaking &  
Characterization of Dust Lead Levels  
After Renovation, Repair and Painting

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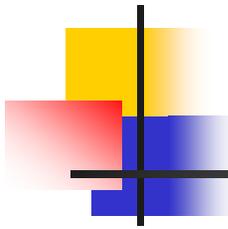
**Summary of Rulemaking & Study Results**

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**U.S. EPA, Washington DC**

**Office Of Pollution Prevention & Toxics**

**March 14, 2007**

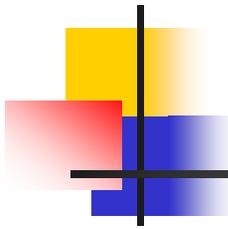


# Statutory Mandate for EPA

## Residential LBP Hazard Reduction Act of 1992

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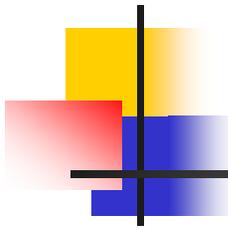
- For abatement:
  - ✓ Certify contractors.
  - ✓ Accredit training providers.
  - ✓ Develop work practice standards.
  - ✓ Allow State program authorization.
  - ✓ Final rule published on August 29, 1996.
- For renovation, repair and painting activities:
  - ✓ Establish guidelines for the conduct of renovation (completed September 1997).
  - ✓ Study hazards from renovation tasks (completed January 2000)
  - **Revise the abatement regulations to apply to renovation activities that create lead hazards by October 26, 1996.**



# Pre-Proposal Activities

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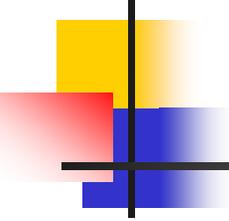
- Renovation study (December 1999) showed activities produced hazardous quantities of lead dust and typical cleanup methods are not effective at eliminating lead dust hazards.
- Extensive stakeholder consultation. SBREFA panel (March 2000), and numerous public meetings.
- Developed a Model Lead Safe Work Practices course (June 2003).
- Evaluated a voluntary program for contractors to encourage the use of lead safe work practices (2004/2005).



# Proposal - Purpose

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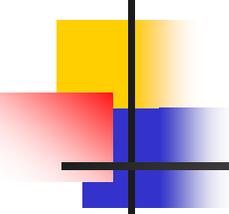
- Prevent the introduction of lead hazards resulting from renovation, repair, and painting activities in homes with lead-based paint.
  - Ensure persons performing renovations are properly trained.
  - Ensure training providers are accredited.
  - Ensure renovators and firms performing renovations are certified.
  - Ensure lead-safe work practices are followed during renovations.



# Proposal - Rule

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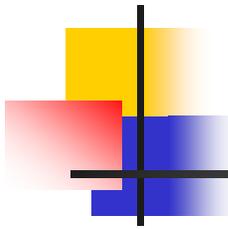
- Signed December 29, 2005.
- Comment period extended from April 10<sup>th</sup> to May 25<sup>th</sup>.
- Over 250 comments received.



# Proposal: Applicability

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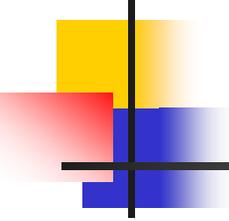
- Applies to renovations of most pre-1978 housing performed for compensation, except:
  - Activities that disrupt less than 2 ft<sup>2</sup> painted surface;
  - Where an inspection shows no lead-based paint;
  - Where a signed statement by the owner occupant indicates that no child under 6 lives in the home; or
  - Where a test kit used by a certified renovator shows no lead-based paint.
- Rule does not apply to individuals doing work in housing that they own and occupy.



# Proposal: Effective Dates

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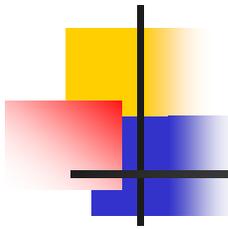
- To allow time for the development of improved test kits, Agency is proposing to phase in requirements:
  - **Phase 1** – Pre-1960 housing covered by the rule, but any housing if a child under 6 with an EBL.
  - **Phase 2** – All housing covered by the rule.



# Proposal: Certification & Training

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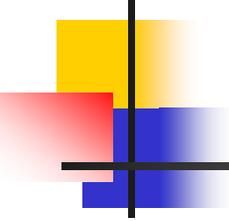
- Firms must pay a fee (to be determined).
- Renovators and Dust Sampling Technicians must successfully complete an accredited one-day training course.
- Certifications are good for 3 years.
- Certification applies to any non-authorized State or Indian tribal area.
- Workers are trained by the renovator.



# Proposal: Work Practice Standards

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- Post signs defining the work area.
- Isolate the work area so that no visible dust or debris can leave the work area.
- Contain the work area during the project.
- Contain debris at the end of the day and transfer off-site under containment.
- Clean the work area when job is done, with a HEPA-equipped vacuum and/or damp mop or cloth.
- Cleaning Verification - Verify with the use of wet and dry disposable cleaning cloths

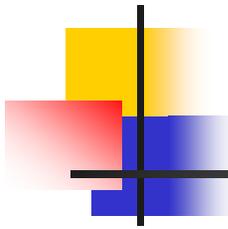


# Proposal: Work Practice Standards

## Responsibilities

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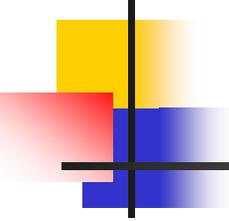
- Firms must follow work practice standards and use certified renovators & trained workers.
- Certified renovators must train workers, ensure compliance with work practice standards, & perform post-renovation cleaning verification.



# Dust Study: Overall Purpose

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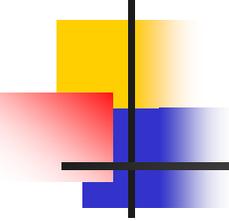
- Compare the amount of lead dust remaining after the use of proposed work practices with the amount of lead dust remaining after typical renovation work practices.



# Summary of Study Design

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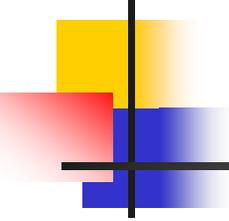
- The study consisted of 75 experiments
  - 60 interior experiments
    - 48 at housing units
    - 12 at child-occupied facilities
  - 15 exterior experiments
    - 12 at housing units
    - 3 at child-occupied facilities
- Over 5,000 samples were taken
- The design of the study was peer-reviewed before the study was started



# Summary of Study Design

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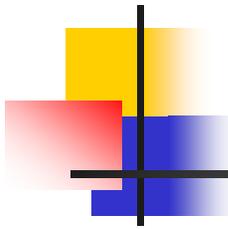
- All housing in the study was built between 1900-1925 and the child occupied facility built in 1967.
- All study buildings were unoccupied at time of study.



# Summary of Study Design

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- The study assessed a variety of typical renovation activities, including kitchen guts, window replacement, door planing, trim replacement, paint removal
- Each type of job, e.g., window replacement, was conducted under 4 different conditions
  - Using the proposed work practices of containment, specialized cleaning, and cleaning verification
  - Using typical containment and cleaning practices (“Baseline practices”)
  - Baseline practices with specialized cleaning
  - Proposed rule requirements for containment and baseline cleaning
- The study looked at the full range of methods and activities allowed by the proposed rule, including those practices restricted or prohibited by EPA’s abatement regulations, e.g., use of a heat gun >1,100 degrees



# Next Steps

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- ✓ Risk Assessment being conducted, with this study as one of the inputs
- ✓ Peer Review of Risk Assessment and its inputs being conducted by the Clean Air Scientific Advisory Committee.
- ✓ EPA will make two studies available to the public through a Federal Register Notice:
  - EPA - *Characterization of Dust Lead Levels after Renovation, Repair, and Painting Activities; and*
  - National Association of Home Builders (NAHB) - *Lead-Safe Work Practices Survey Project.*
  - EPA will consider revisions to the proposed work practice standards following internal review of these studies and consideration of public comments received as a result of this Notice.