Lead Poisoning Prevention: New EPA Renovation, Repair & Painting Rule
Why Are We Here Today?

- Lead used in paint until 1978 & many schools built before that time.

- Lead is especially dangerous to young children and pregnant women.

- Lead poisoning can be prevented! New EPA Rules for Renovation, Repair & Painting.
Exposure to Lead

- Children: Ingest lead dust from hands, toys and other objects.
- Adults: Inhale lead dust during work or hobby.
How Lead Affects Children

- Brain damage
- Decreased intelligence and attention
- Difficulty learning and reading
- Increased behavioral problems
- Slowed growth and development
- Kidney and liver damage
How Lead Affects Adults

- Impotency, reduced fertility
- Pregnant women: miscarriages, premature births, low birth weight
- High blood pressure
- Digestive problems
- Memory & concentration problems
- Muscle & joint pain
Sources of Childhood Lead Poisoning in Oregon

% of Investigations

Sources of Exposures

Remodeling
Lead Paint Dust
New to Oregon
Ingestion
Other
Unknown
Many Old Buildings and Homes Contain Lead-Based Paint

Built before:

- 1940: 86%
- 1960: 66%
- 1978: 25%
- 1978 onwards: unlikely
Dry scraping and power sanding, create and spread a large amount of dust and debris.
Spot the Hazards
Federal Lead Regulations

• **EPA**: Abatement & new Renovation, Repair, & Painting (R,R, & P) Rule.

• **OSHA**-Worker protection standards.
R, R & P Rule

To address lead-based paint hazards created by renovation, repair, and painting activities that disturb lead-based paint in “target housing” and “child-occupied facilities.”
Abatement intended to permanently eliminate (20 yrs +) existing lead hazards.
Renovation

Renovations involve activities designed to update, maintain, or modify all or part of a building for example room addition, painting.
Child-Occupied

- Pre-1978.

- Visited regularly by the same child (< 6 3 hrs/day, 2 days/wk).

- May be located in public or commercial building. Includes schools & child care facilities.
Exclusions:

• Renovations affect only components determined to be free of lead.

• Disturb under 6 ft\(^2\) interior or 20 ft\(^2\) exterior (except window replacement, demolition & projects involving prohibited practices.)
Exclusions:

• Work done by individuals in housing they own and occupy.

• Emergency renovations (clean-up & cleaning verification still apply).
RRP Requirements

• Renovators to be certified (5 years) through training.

• Firms to be certified (5 years).

• Training providers to be accredited.

• Use of specific work practices.

• Pre-renovation education.
Determine if RRP applies to your school and/or project:

– What is the building history?
– Pre-1978? All or some areas?
– Where will children < 6 years spend time?
Will RRP Apply?
Assume or Test

• Assume the building has LBP & follow RRP rules.

• Have a RRP Certified Renovator test.

• Have a state certified paint inspector/risk assessor test the paint.
RRP & Schools

- Will staff perform the work?
- Need to have a Certified Renovator and Certified Firm if performing maintenance, renovations or repair.
- Pre-renovation notification.
- Clearance testing recommended.
Firms

• Application & fees to EPA and/or authorized state program.

• DHS - $250 every 5 years.

• CCB - $50 annually.
Firm Responsibilities:

• Ensure compliance with RRP Rule.
• Ensure activities performed by certified renovators or have been trained by a certified renovator.
• Assign a Certified Renovator to all jobs.
• Meet pre-renovation & recordkeeping requirements.
Renovator Responsibilities:

• Be present at work site:
  – Warning signs are posted
  – Containment being established
  – Work area cleaning is performed.

• Be available, either on-site or by telephone, at all times that renovations are being conducted.
Renovator Responsibilities:

- Determine if lead-based paint is present.
- Carry copies initial certificate and most recent refresher certificate.
- Must prepare required records.
Lead Paint Determination

• Written determination by certified inspector or risk assessor, or

• Written determination by Certified Renovator using an EPA approved lead test kit.
Work Practice Standards:

• Set-up

• Prohibited Practices and Dust Reduction

• Cleanup and Cleaning Verification or Clearance

• Recordkeeping
Work Practices-General:

• Post warning signs.

• Isolate the work area-contain debris.

• Prohibited practices:
  – Open flame burning/torching
  – Heat gun above 750 °F
  – Power machines without HEPA attachment
**Interiors**

- Remove or cover objects.
- Close or cover HVAC, windows, doors.
- Cover floor with plastic.
- When leaving work area—ensure staff, tools, waste are free of dust & debris.
Exteriors

- Close doors & windows within 20 ft.
- Cover ground with plastic sheeting.
Waste

- Contain waste at all times to prevent releases of dust and debris.
Cleaning

• No visible dust, chips or debris.

• Clean-up plastic sheeting.

• Clean all surfaces with HEPA, damp cloth or mop.

• Verify cleaning – Card.
Pre-Renovation Requirements

Renovate Right
Important Lead Hazard Information for Families, Child Care Providers and Schools

The Lead-Safe Certified Guide to RENOVATE RIGHT

[Image with a child looking at a door]

[Image with a child looking at a door with caution tape]
Enforcement

• Suspend, revoke, or modify a firm’s certification.

• Civil penalties up to $5,000 for each violation.

• Licensed Contractor – CCB.

• All others (schools, prop. mgmt) – DHS.
Resources

Lead Poisoning Prevention:

971-673-0440
www.heathoregon.org/lead

LeadLine:

Portland Metro: 503-988-4000
Statewide: 800-368-5060
Questions