

## **Remodeling and the New EPA Lead Paint Rule**

If your home was built before 1978 your next remodel or repair may involve some additional precautions. On April 22, 2010 the Environmental Protection Agency's new "Renovation, Repair and Painting Rule" (RRP) went into effect. The rule affects residential rental property owners, general contractors and specialty contractors such as painters, electricians, plumbers, carpenters and HVAC. The purpose of the rule is to protect workers and the building occupants from lead exposure during renovation, repair and remodeling. The rule affects a large percentage of the homes in Traverse City and some of our older communities and neighborhoods and applies if more than 6 square feet of interior painted surface is disturbed and/or 20 square feet on the exterior, window replacement is also included.

Under the new law a company contracting work in targeted housing must apply to become a Certified Firm with the EPA and must have a Certified Renovator on site to supervise compliance of lead-safe work practices. The contractor must provide the owner/occupant with the EPA lead hazard pamphlet "Renovate Right" and have them sign a confirmation of receipt form.

Many homes built before 1978 have already gone through some type of renovation which may have eliminated any prior lead paint. A pre-construction test should be performed to determine if lead based paint is present, if lead is not present then the rule won't apply. One way to test for lead paint is to purchase some do-it-yourself EPA approved test strips available at several local paint stores. The problem with some of these is that you may get a negative reading when there is actually lead present. Another way is to hire a third party verifier; there are several local ones, to test the area with X-Ray Fluorescence equipment which is more accurate and versatile.

If lead paint is present then lead-safe work practices must be used. Signage needs to warn occupants and visitors of the danger, and the work area must be completely contained with plastic sheeting, seal off any air duct supplies and returns and protect any owner/occupant personal belongings from dust contamination. The workers must also wear protective clothing with respirator and decontaminate themselves as they leave the work area. Any debris also has to be bagged or wrapped in plastic and kept in a safe area or container with appropriate signage. After the demolition phase of the project has been completed and cleaned up most of the lead hazard will be gone. After project completion a clean verification test needs to be taken by the Certified Renovator or third party verifier. All of the safety precautions fall into three simple procedures:

- Contain the work area
- Minimize dust
- Clean up thoroughly

Most conscientious and experienced contractors are already following these steps; it may simply require a little more attention to detail.

The intent of this article is to educate owners of pre-1978 homes on the new RRP ruling that your contractor will have to comply with. If you are considering a repair, home

improvement or renovation project and live in a home with possible lead paint be sure you use certified contractors and qualified people. Using non-certified workers could cause your project to be stopped until compliance is met and with a fine of \$37,500 per violation per day your contractor may not come back. To make sure you are talking to a qualified person ask for their credentials. A Certified Renovator will have a certificate stating completion of training with their photo on it and a Certified Firm will have a certificate from the EPA. For more information on the RRP Rule you can go [www.epa.gov](http://www.epa.gov), or to locate a Certified Firm visit the EPA at <http://www.epa.gov/lead/pubs/renovation.htm#related> and link to “Certified Firms near you”.

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