

Subject: Federal Agency Compliance with EPA's Lead Renovation, Repair and Painting Rule

Dear Federal Agency:

If you manage your own buildings you need to know about EPA's Renovation, Repair and Painting (RRP) rule. The rule was signed in April 2008 and will impact your property management practices in important ways. The rule requires those who disturb paint in pre-1978 structures to be certified and follow lead-safe work practices by April 2010 or to hire certified firms who follow lead-safe work practices. As a federal property manager, it is your responsibility to ensure compliance with the rule and you play an important role in protecting public health by helping prevent lead exposure from your units. Although lead-based paint was banned for residential use in 1978, almost 38 million U.S. homes, residential apartments, and commercial buildings still contain some lead-based paint. Routine renovation and maintenance activities in older structures can create dust that contains lead—even small amounts of lead can harm children and adults.

Even before the April 2010 requirements take effect, property managers performing renovation, repair and painting work should strive to work lead-safe. If an external party is hired to perform the work you should also encourage them to work lead-safe. Three simple procedures should be followed:

1. **Contain the work area** - Take steps to seal off the work area so that dust and debris do not escape. Warning signs should be put up and heavy-duty plastic and tape should be used to cover the floors and furniture and seal off doors and heating and cooling system vents.
2. **Minimize dust** - Use work practices that minimize the dust generated during renovation and repair by using water to mist areas before sanding or scraping; scoring paint before separating components; and prying and pulling apart components instead of breaking them. Dangerous practices such as open flame burning or torching and using power tools without HEPA vacuum attachments are prohibited by the rule because they generate large amounts of lead-contaminated dust.
3. **Clean up thoroughly** - Work diligently every day to keep the work area as clean as possible. When all the work is done, the area should be cleaned up using special cleaning methods including the use of a HEPA vacuum and wet mopping.

While the rule will not be fully implemented until April of 2010 certain elements are required now, and others require attention well before April 2010.

- Effective now – Property managers who disturb paint in homes, residential buildings, schools and child care facilities built prior to 1978 must provide lead hazard information prior to the start of the job to building owners, occupants, and to the families of children using the facilities by distributing EPA's *Renovate Right* brochure, (*Renovate Right* is available at [www.epa.gov/lead/pubs/renovaterightbrochure.pdf](http://www.epa.gov/lead/pubs/renovaterightbrochure.pdf)).
- October 2009 – Property managers who employ those who perform renovation, repair and painting work, can apply for EPA or state certification.
- April 2010 – All federal agencies that manage their own property and engage in renovation, repair or painting activities in homes, residential buildings, schools and child care facilities built prior to 1978 must be certified, use trained workers, and follow specific lead-safe work practices to prevent lead contamination. If you hire external parties to do this work, you should ensure that they are certified and use lead-safe work practices.

EPA encourages all federal agencies that perform renovation, repair and painting activities to begin preparing to become trained and certified as lead-safe firms as soon as possible. Noncompliance can result in significant monetary penalties. Agencies may also be exposed to legal liability if a child

comes into contact with lead-based paint dust or suffers lead poisoning as a result of a firm not following lead-safe work practices. EPA has prepared a compliance guide for contractors and construction trade workers which details all of the requirements of this new rule. The guide is available at [www.epa.gov/lead/pubs/sbcomplianceguide.pdf](http://www.epa.gov/lead/pubs/sbcomplianceguide.pdf).

For more information on the lead RRP Rule or to sign up to receive information about EPA's new requirements, please visit our web-site at <http://www.epa.gov/lead>, or contact the National Lead Information Center at 1-800-424-LEAD.

Sincerely,

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