



On The Alert!

Date: June 1, 2020
Attention: ASCIP Members
Affected: All School Facilities
Applicability: K-12, Charter Schools, & Community College Districts

Lead-Safe Renovations, Repairs, and Painting

The Environmental Protection Agency's (EPA) Lead Renovation, Repair and Painting (RRP) Rule requires that renovations, repairs, and painting projects that disturb lead-based paint in child-occupied facilities built before 1978 be carried out by 'lead-safe certified' firms. Such firms have been certified by the EPA and use certified renovators who are trained by EPA-approved training providers and follow lead-safe work practices.

A Child Occupied Facility is a building or portion of a building that is:

- Visited regularly by the same child, under six (6) years of age,
- The child's visitation occurs on at least two (2) different days within a week,
- Each day's visit lasts at least three (3) hours,
- Combined weekly visits last at least six (6) hours, and
- Annual visits total at least 60 hours.

A building deemed a child-occupied facility, remains so for one (1) year and is reviewed annually thereafter to confirm it continues to meet the definition of a child-occupied facility.

Renovation is defined as "any activity that disturbs painted surfaces and includes most repair, remodeling, and maintenance activities, including window replacement." Activities covered by the rule include any activity that disturbs paint, i.e. remodeling and repair/maintenance, electrical work, plumbing, painting preparation, carpentry, and window replacement.

District employees would need to comply with the RRP rule, including:

- Providing the approved lead pamphlet to occupants before starting RRP operations;
- Registering with the EPA as a Lead-Safe Certified Firm - <https://www.epa.gov/lead/getcertified>;
- Training employees in lead-safe work practices;
- Keeping RRP records for three (3) years; and
- Posting signage when conducting RRP operations.

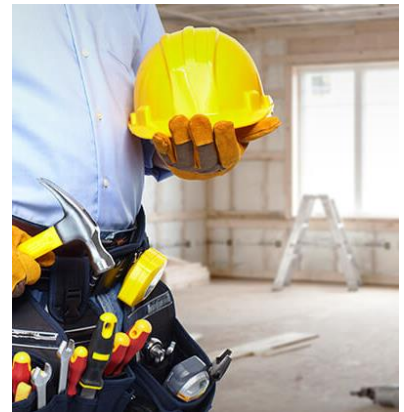
Exemptions

Activities not covered by the rule:

- Buildings built on or after 1978.
- Structures or components declared lead-free by a certified inspector or risk assessor.
- Structures or components reported lead-free by a certified renovator using an EPA recognized test kit or by an EPA approved laboratory.
- Minor repair and maintenance activities that disturb 6 square feet or less of paint per room inside, or 20 square feet or less on the exterior of a building.

Note: Window replacement, and partial and full demolition activities, are always covered regardless of square footage. Activities designated as "prohibited" are prohibited irrespective of square footage.

For more information on RRP call the National Lead Information Center at 1 (800) 424-LEAD [5323] or see <https://www.epa.gov/lead/renovation-repair-and-painting-program-operators-childcare-facilities> .



Please contact your ASCIP risk services consultant at (562) 404-8029 to discuss further.