



CITY OF GENEVA
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CITY OF GENEVA GUIDE TO THE EPA RRP RULE – (LEAD PAINT IN HISTORIC OR OLDER PROPERTIES)

Lead poisoning is a serious health and safety issue. The City of Geneva recognizes the concerns that lead paint presents and encourages everyone to work lead safe. To decrease the negative effects of lead poisoning, the United State Environmental Protection Agency (EPA) established the Renovation, Repair and Painting (RRP) Rule. Beginning April 22, 2010, federal law requires that contractors performing renovation, repair and painting projects that disturb paint in homes, child care facilities, and schools built **before 1978** must be certified and trained to follow specific work practices to prevent lead contamination.

This document serves as a guide to the hazards of lead-based paint and to the requirements of the EPA's rule – requirements for contractors and property owners who are considering construction activities.

LEAD-BASED PAINT HAZARDS

- Lead gets into the body when it is swallowed or breathed.
- People, especially children, can swallow lead dust or paint chips as they eat, play, and perform other ordinary hand-to-mouth activities.
- People may also breathe in lead dust or fumes while they work on jobs that sand, scrape, burn, brush, blast or otherwise disturb painted surfaces that contain lead.
- Once in the body, lead can have significant effects on human health. In children, lead poisoning damages the nervous system and causes developmental and behavioral problems that can affect them for their lifetime. In adults, lead poisoning causes health and reproductive problems. Pregnant women are especially vulnerable to the effects of lead.
- Lead contamination can occur from the following sources:
 - Paint chips – paint that is peeling, chipping, cracking, or chalking. This typically occurs in areas where there are moving parts or endure wear and tear such as banisters, doors, and door frames; also, fences, porches, railings, stairs and windows, and window jambs.
 - Lead dust – comes from points of friction where painted surfaces rub and from renovation activities such as dry scraping, dry sanding, or heating or lead paint. Lead dust can be virtually invisible and can spread around a home through sweeping and vacuuming with a non-HEPA vacuum.

RRP GUIDELINES

The EPA's Repair, Renovate and Painting (RRP) rule has four main components: notification, certification, lead-safe practices, and record keeping.

1. Notification

Contractors are required to notify their clients to the dangers of lead paint. This is done by giving them a copy of the EPA's *Renovate Right* booklet.

2. Certification

Any firm performing renovation, repair or painting work must become certified through an EPA-authorized training program. Additionally, workers must receive training and be individually certified to carry our renovations involving lead paint.

3. Lead Safe Practices

These are the actual procedures for carrying out the work.

- Step 1: Identify if lead paint is present. If built before 1978 it likely has lead paint. If not certain, use lead safe practices or have the paint tested.
- Step 2: Set up a safe work site. Separate the work area from the rest of the home/building. Restrict access, cover floor/ground.
- Step 3: Protect yourself. Wear protective eye wear, a hat, wear disposable clothing/gloves/shoe covers, use disposable N-100 respirator
- Step 4: Minimize dust. Keep dust down by using the right tools and following simple practices that minimize and control spread of dust. Prohibit work practices which may increase dust or fume production like open-flame burning, use of heat guns greater than 1100 degrees F and use of power tools without HEPA exhaust control (dust collection).
- Step 5: Thoroughly clean the work area.
- Step 6: Control the waste. Use heavy plastic sheeting or bags to collect waste. Bag and seal all waste before removing it from the work area.
- Step 7: Verify work completion with cleaning verification procedure.

4. Record-Keeping

Contractors must keep records that verify the procedures that were carried out for notification, testing, setting up, and cleaning.

Buildings that Require Compliance with the EPA's Renovation, Repair, and Painting Rule (RRP)

- Residential properties (single family/apartments), child-occupied facilities such as schools and day-care centers built before 1978.

Activities Which Require Compliance with RRP

- Window replacements; window repair
- Demolition
- Disturbing more than six (6) square feet of painted surface per interior room and/or 20 square feet of exterior painted surface

An Activity is Exempt from the RRP rule if all of the following are met:

- Renovation will occur in the owner's residence;
- No child under age 6 resides there;
- No woman who is pregnant resides there;
- The housing is not a child-occupied facility; and
- The owner acknowledges that the renovation firm will not be required to use the work practices in the RRP Rule.

RRP Rule & the Preservation of Older and Historic Buildings

- The new EPA rules for Renovation, Repair & Painting (RRP) focus on the practices which a contractor uses when working on your home or commercial building. These practices differ from practices which focus on lead paint abatement (permanently eliminating lead-based paint).
- Properly addressing lead paint does not automatically translate into removing older painted windows, doors, woodwork and siding. Through simple maintenance, inexpensive materials, and lead-safe renovation techniques, buildings can be made lead-safe while preserving their significant architectural features.
- Both window replacement and window repair require compliance with the RRP Rule.

RESOURCES

Following is a list of resources available on the internet for more information about the RRP rule:

EPA: Renovation Repair & Painting Rule

<http://www.epa.gov/lead/>

EPA: Small Entity Compliance Guide to Renovate Right; A Handbook for contractors, property managers and maintenance personnel working in homes and child-occupied facilities built before 1978

<http://www.epa.gov/lead/pubs/sbcomplianceguide.pdf>

EPA: Renovate Right Brochure

<http://www.epa.gov/lead/pubs/renovaterightbrochure.pdf>

EPA: Federal rule, (in its entirety)

<http://www.epa.gov/fedrgstr/EPA-TOX/2008/April/Day-22/t8141.pdf>

Illinois Department of Public Health: Lead Program

<http://www.idph.state.il.us/envhealth/lead.htm>

National Trust for Historic Preservation: "Understanding the New Rule"

<http://www.preservationnation.org/issues/lead-paint/new-rule.html>



This information is intended as a guide to the EPA's RRP rule. The information was gathered from the websites of the Environmental Protection Agency and the National Trust for Historic Preservation. The information herein is in no way a substitute for the rules as described and enforced by the EPA but serves as a resource tool for distribution by the City of Geneva for property owners and tenants of properties built before 1978.