# **RENOVATION (RRP - EPA)**

If disturbing more than 6 square feet on the interior or more than 20 square feet on the exterior, you are responsible for:

- Becoming or being an EPA Lead-Safe Certified Contractor.
- Having certified personnel perform the work.
- Knowing if lead is present.
- Informing the owner and occupants of potential hazards.
- Protecting the occupants of the dwelling from lead hazards.
- Following Code of State Regulations and using Lead Safe Practices.
- Protecting you and co-workers from takehome dust.
- Maintaining all records of the project for a minimum of three years.

## **ABATEMENT (DHSS)**

If lead is present and the work is being performed to address or remediate the lead hazard specifically, you are responsible for:

- Becoming or being a Licensed Lead Abatement Contractor.
- Having Licensed Lead Abatement Supervisors or Workers perform the work.
- Notifying the Lead Licensing Program of a project.
- Informing the owner and occupants of potential hazards.
- Creating an Occupant Protection Plan for the Project.
- Following Code of State Regulations and using Lead Safe Practices.
- Protecting you and co-workers from takehome dust.
- Maintaining all records of the project for a minimum of three years.

For more information about lead hazards or if you have questions about our program contact:

Missouri Department of Health and Senior Services Lead Licensing Program PO Box 570, Jefferson City, MO 65102 Phone: 888-837-0927 or 573-526-5873

email: <a href="mailto:lead@health.mo.gov">lead@health.mo.gov</a> <a href="mailto:health.mo.gov/safety/leadlicensing">health.mo.gov/safety/leadlicensing</a>



The Lead Licensing Program works in cooperation with the following federal and state agencies:

- U.S. Environmental Protection Agency Region 7 (913-551-7003)
- U.S. Department of Housing and Urban Development Office of Lead Hazard Control (202-755-1785)
- U.S. Occupational Safety and Health Kansas City Office, Western Region (816-483-9531)
   St. Louis Office, Eastern Region (314-425-4249)
- Missouri Department of Natural Resources
   Environmental Remediation Program (573-751-3176)
- Waste Management Program (573-751-5401)

If you think you have witnessed an environmental crime in Iowa, Kansas, Missouri or Nebraska you can file a complaint at <a href="https://www.epa.gov/ks/forms/region-7-">https://www.epa.gov/ks/forms/region-7-</a>

contact-us-about-lead-tips-and-complaints or call 913-551-7999 to report it to the EPA Region 7 Criminal Investigation Division.





An EO/AA employer: Services provided on a nondiscriminatory basis. Individuals who are deaf, hard-of-hearing, or have a speech disability can dial 711 or 1-800-735-2966.

# Lead Abatement vs. Renovation, Repair and Painting



If you are working on homes, schools, or daycare centers built before 1978, you must be EPA lead-safe certified.

# What is Renovation, Repair and Painting (RRP)?

Any work performed in homes, child care facilities and pre-schools built before 1978 that disturbs more than 6 square feet on the interior or more than 20 square feet on the exterior of the property. Guidance is available from the Environmental Protection Agency (EPA) for conducting renovation and remodeling activities safely at <a href="https://www.epa.gov/lead/small-entity-compliance-guide-renovate-right-epas-lead-based-paint-renovation-repair-and-0">https://www.epa.gov/lead/small-entity-compliance-guide-renovate-right-epas-lead-based-paint-renovation-repair-and-0</a>

EPA's Lead Renovation, Repair and Painting Rule (RRP) requires that firms that disturb paint in homes, child care facilities and pre-schools built before 1978 be certified by EPA, use trained certified renovators, and follow lead-safe work practices. Certified firms are also required by the rule to retain all records for these projects for a minimum of three years following completion of each project.

### RRP vs. Lead Abatement?

RRP differs from Lead Abatement in that RRP is the incidental disturbance of leaded paint through remodeling activities or general maintenance. Lead abatement projects are designed to permanently eliminate existing lead hazards and require licensure by the Missouri Department of Health and Senior Services, of all personnel participating in the project.

Lead abatement projects may be ordered by a state or local government in response to a lead-poisoned child, may be required due to local ordinance or the use of public funds, or may be undertaken voluntarily by the owner at any time. More information on lead abatement can be found at <a href="https://health.mo.gov/safety/leadlicensing/index.php">https://health.mo.gov/safety/leadlicensing/index.php</a>.

Do I have to be licensed by the Lead Licensing Program to conduct renovation and remodeling activities in a dwelling that contains leadbased paint?

Department of Health and Senior Services regulates lead abatement activities in the state of Missouri. Incidental disturbance of lead-based paint through remodeling activities or general maintenance does not meet our definition of abatement; however, the EPA RRP rule does apply, must be followed, and does require companies and individuals to be certified to perform this type of work. Guidance is available from the EPA for conducting renovation and remodeling activities safely.

Links to more EPA information on this topic:

- <a href="https://www.epa.gov/lead/lead-abatement-vs-lead-rrp">https://www.epa.gov/lead/lead-abatement-vs-lead-rrp</a>
- <a href="https://www.epa.gov/lead/">https://www.epa.gov/lead/</a>
   <a href="renovation-repair-and-painting-program">renovation-repair-and-painting-program</a>
- https://www.epa.gov/sites/ production/files/documents/ renovaterightbrochure.pdf









#### WHAT IS RENOVATION?

Under the RRP rule, anyone who disturbs painted surfaces where lead may be present must:

- Submit an application to certify your firm for five years.
- Take a one-day class that will certify your renovators for five years.
- Learn the required steps to contain the work area, minimize dust and thoroughly clean up every day.

#### WHO RENOVATES?

Any contractor, including renovators, electricians, HVAC specialists, plumbers, painters, and maintenance staff, who disrupts more than 6 square feet of lead paint in pre-1978 homes, schools, daycare centers, and other places where children spend time.

#### WHY RENOVATE?

- To avoid risk of government fines and civil liability.
   Without certification and by not following
   approved practices, you and your company can
   face tens of thousands of dollars in fines and
   put yourself and your company at risk of
   potential lawsuits.
- To protect your workers, yourself and your customers from a health risk such as lead dust from renovation, repairs and painting that can contaminate an entire home and, if inhaled or ingested, can cause irreversible damage to children and adults.
- 3. To gain competitive advantage: Certification makes you stand out from others and positions you as a professional contractor consumers can trust. Using your company's certification in your marketing materials may help attract business. Consumers will look for the certification before hiring contractors and may be more accepting of additional costs and time associated with doing the job safely.

Upon certification of your firm, your company will be listed as a Lead-Safe Certified Contractor on the EPA website, giving your firm the potential for new customers.