
ASCIP

RISK ALERT!

Date: *May 21, 2010*

Attention: *ASCIP Members*

Subject: *Lead-Safe Renovation, Repairs and Painting*

In view of the recent media attention given to the incidents of Lead contamination being found in some drinking water, childrens' toys, childrens' books and synthetic turfs, government officials and safety groups are calling for stricter regulations regarding lead. On April 22, 2008, the EPA issued a lead-safe practices rule (40 CFR 745) that affects renovation, repair and painting (RRP) projects that may disturb lead-based paint in homes, child care facilities and schools built before 1978. This new rule took effect on April 22, 2010. The EPA states that "*Renovation is broadly defined as any activity that disturbs painted surfaces and includes most repair, remodeling, and maintenance activities, including window replacement.*"

Lead is a toxic substance that, if ingested or inhaled, may result in a wide range of adverse health effects. Both children and adults can suffer health effects from Lead exposure. The most common of these health effects in small children are learning difficulties, behavioral problems and hearing difficulties.

The RRP rule applies to *firms* and individuals who perform renovations, repairs and painting *for compensation* in pre-1978 housing and "child occupied facilities" with lead based paint if those renovations, repairs and painting operations involve children less than 6 years of age, last more than 3 hours a day OR more than 6 hours a week. In addition, *interior* areas of 6 square feet OR *exterior* areas of 20 square feet, require firms and individuals to follow the RRP rule.

Initially, schools districts were thought to be exempt from the RRP rule, however, the Environmental Protection Agency (EPA) has interpreted the term "*for compensation*" to include salaries and wages of employees as compensation. Therefore, school districts, colleges, ROP's and charter schools' employees would need to comply with the RRP rule. This includes: providing the approved lead pamphlet to occupants prior to starting RRP operations; registering with the EPA as a Lead-Safe Certified Firm <http://www.epa.gov/lead/pubs/toolkits.htm>; train employees in lead-safe work practices; keep RRP records for 3 years; and post signage when conducting RRP operations.

For more information on RRP, see www.epa.gov/lead or call the National Lead Information Center at 1-800-424-LEAD

ASCIP staff is available to assist in addressing potential Lead exposure concerns as they may arise.

Related Risk Alerts:

[Lead Hazards in Artificial Turf](#)

[Lead Hazards in Toys and Lunchboxes](#)

[Lead in Drinking Water](#)