

UNIVERSITY OF WYOMING

Risk Management and Safety

Lead Safety for Renovation, Repair,
and Painting (RRP) Procedures

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I. INTRODUCTION

The leaded dust generated by traditional renovation work can cause lead poisoning in children. It can also poison pregnant women, workers, and even pets. The use of lead-safe practices makes such jobs safer and reduces the University of Wyoming's liability exposure. The EPA's Renovation, Repair, and Painting Final Rule (RRP) (40 CFR 745) requires that renovations conducted for compensation must be performed by Certified Firms using Certified Renovators. Please refer to Appendix A for a copy of UW's Certified Firm certificate. UW personnel involved in renovation work have completed the EPA Certified Renovators course which allows them to do lead safe renovation, repair and painting work in pre-1978 housing and in child-occupied facilities where work will disturb lead-based paint. On or after April 22, 2010, firms working in pre-1978 homes and child-occupied facilities must be certified and use lead-safe work practices during renovations. Additional requirements are included for facilities with children under six years of age receiving Department of Housing and Urban Development (HUD) resources.

In 1978, the Consumer Products Safety Commission banned the sale of lead-based paint for residential use. However, homes built in 1978 could still have used lead-based paint because existing supplies of paint may have still been available.

Enforcement of this rule allows the EPA to suspend, revoke, or modify a firm's certification if the Certified Firm or Certified Renovator is found to be in non-compliance. Non-compliance may result in civil penalties of up to \$32,500 for each violation. Firms that knowingly or willfully violate this regulation may be subject to fines of up to an additional \$32,500 per violation, or imprisonment, or both.

II. EXCLUSIONS

The EPA's RRP rule does not apply to the following: 1) Renovation activities where affect components do not contain lead-based paint, 2) Emergency renovations (requires cleanup and cleaning verification), 3) Minor repair and maintenance activities (this does not include window replacement or demolition) and 4) Renovations performed by homeowners in their own homes. 5) No child under age of 6 resides there, 6) No woman who is pregnant resides there, 7) Not a child-occupied facility and 7) in the case of a home, the owner acknowledges that the renovation firm will not be required to use the work practices contained in the RRP rule.

III. HEALTH RISKS

Lead is very hazardous to children and causes brain and central nervous system damage including decreased intelligence, reading and learning difficulties, behavioral problems, and hyperactivity. Damage can be irreversible, affecting children throughout their lives. Lead is hazardous to the fetus. It also can cause high blood pressure, loss of sex drive and/or capability and physical fatigue in workers and adults.

Symptoms are easily misinterpreted by medical personnel, thus delaying effective treatment and increasing the likelihood of permanent physical and mental damage. The only sure way to determine lead poisoning is to take a blood lead level (BLL) test.

IV. PERSONNEL AFFECTED

This policy applies to all renovation, repair, and painting work of UW Certified Lead Renovators that are involved in lead renovation, repair, or painting activities in pre-1978 buildings that children occupy. This includes the Landmark and Spanish Walk apartments, Education building

and any rental properties owned by UW that have children under the age of 6 residing at or visiting (under rules definition) at the time of the writing of this document.

V. DEFINITIONS

Certified Firm (Includes UW and outside contract firms) must:

- Ensure overall compliance with the RRP rule.
- Ensure that all renovation personnel are Certified Renovators or have been trained on the job by Certified Renovators.
- Assign a Certified Renovator to applicable jobs.
- Meet pre-renovation education requirements
- Meet recordkeeping requirements (i.e., pre-renovation education documentation, documentation of lead-based paint; training and certification records, and cleaning verification records.

Child-Occupied Facility – building, or a portion of a building (pre-1978) that meets all three of the criteria below:

- Visited regularly by the same child, under 6 years of age.
- The visits are on at least two different days within any week (Sunday through Saturday period), provided that each day's visit lasts at least 3 hours.
- Combined weekly visits last at least 6 hours, and the combined annual visits last at least 60 hours.

Note: Child-occupied facilities may be located in a public or commercial building or in target housing. These facilities include schools, child-care facilities, and daycare centers.

Potentially affected entities may include, but are not limited to:

- Building construction (NAICS code 236) e.g., single family housing construction, multi-family housing construction, residential remodelers.
- Specialty trade contractors (NAICS code 238) i.e., plumbing, heating, and air-conditioning contractors, painting and wall covering contractors, electrical contractors, finish carpentry contractors, drywall and insulation contractors, siding contractors, tile and terrazzo contractors, glass and glazing contractors.
- Real estate (NAICS code 531) e.g., lessors of residential buildings and dwellings, residential property managers.
- Child day care services (NAICS code 624410)
- Elementary and secondary schools (NAICS code 611110) e.g., elementary schools with kindergarten classrooms.
- Other technical and trade schools (NAICS code 611519) e.g., training providers
- Engineering services (NAICS code 541330) and building inspection services (NAICS code 541350) e.g., dust sampling technicians.

Clearance standards - EPA and HUD used the following standards when clearance sampling is performed: 1) Floors = 40 ug/ft² 2) Interior window sills = 250 ug/ft² and 3) Window Troughs = 400 ug/ft².

Dusty Jobs – Includes such things as: 1) hand scraping large areas, 2) removing paint with a low temperature heat gun and scraper, 3) removing dry residue and paint after using chemical strippers, 4) demolishing painted surfaces, and 5) removing building components with painted surfaces that are in poor condition.

Emergency Renovations: Activities that were not planned and if not immediately attended to present a safety hazard or threaten equipment and/or property with significant damage or interim controls performed in response to an elevated blood lead level in a resident child. Emergency projects are exempt from the warning sign, containment, waste-handling, training, and certification requirements to the extent necessary to respond to the emergency. Emergency renovations are not exempt from the cleaning and cleaning verification requirements.

EPA – Environmental Protection Agency.

HUD – Housing and Urban Development (U.S. Department) has specific requirements if certified renovators work in Federally-assisted target housing. At the time of this document writing, no such facilities are present at UW. The HUD Lead Safe Housing Rule applies to every home built prior to 1978 that receives Federal housing assistance, typically provided through state and local governments where greater than HUD's *de minimis* amounts of painted surface will be disturbed. These amounts are: 2 square feet of interior lead-based paint, 20 square feet of exterior lead-based paint or 10% of the total surface area on an interior or exterior type of component with a small surface area that contain lead-based paint (i.e., window sills, baseboards, and trim).

Individual Certification – must take an EPA-approved 8 hour training course from an EPA accredited training provider. Refresher training is required every 5 years.

Lead Abatement – any measures designed to permanently remove or cover lead-based paint or its hazards. Abatement includes, but is not limited to:

- 1) The removal of paint and dust, the permanent enclosure or encapsulation of lead-based paint, the replacement of painted surfaces or fixtures or the removal or permanent cover of soil (if lead is present),
- 2) All preparation, cleanup, disposal, and post-abatement clearance testing activities associated with such measures (40 CFR745.223).

Abatement does not include renovation, remodeling, landscaping or other activities when such activities are not designed to permanently eliminate lead-based paint hazards but are designed to repair, restore, or remodel a given structure or dwelling even if these activities incidentally result in a reduction or elimination of lead-based paint hazards.

Lead-Based Paint – Any paint or surface coatings that contain lead equal to or in excess of 1.0 milligrams per square centimeter or more than 0.5 percent by weight.

Minor Repair and Maintenance Activities – Includes interior work disturbing less than 6 square feet (6 ft²) per room of painted surface. Cleanup and cleaning verification are not required after this activity unless they involve window replacement, demolition, or prohibited practices.

Includes exterior work disturbing less than 20 square feet (20 ft²) of painted surface. Cleanup and cleaning verification are not required for this activity unless the work involves window replacement, demolition, or prohibited practices. The entire surface area of a removed component is the amount of painted surface disturbed.

Work, other than emergency renovations, performed within a 30-day period must be considered the same job when determining the amount of paint disturbed.

OSHA – Occupational Safety and Health Administration has a Lead in Construction Standard which outlines worker protection requirements.

Setup Practices – includes all activities prior to the renovation, repair or painting work (i.e., posting of signs and containing work area).

Target Housing – is a home or residential unit built on or before December 31, 1977 except:

- a)** Housing designated for the elderly or persons with disabilities (unless a child who is less than 6 years of age resides or is expected to reside in such housing).
- b)** Any zero-bedroom dwelling (e.g. studio apartments, hospitals, hotels, dormitories, etc.)

VI. RESPONSIBILITIES

Certified Renovator

- Performs work and direct lead-safe work practices.
- Provide on-the-job training to non-certified workers (if used).
- Keep a copy of the initial and/or refresher training certificates onsite (at job).
- Use EPA-recognized test kits to identify lead based paint.
- Be physically present while posting signs, containing work area, and cleaning work areas. When not on site, be available by telephone or pager.
- Maintain the containment to keep dust and debris within the work areas.
- Implement the cleaning verification procedure.
- Prepare and maintain required records (ensuring work was done in a lead safe manner).

Risk Management and Safety (RMSO)

- Assist in the acquisition of required certifications for the University and its workers.
- Assist in ensuring that proper lead safe work practices are used and that required recordkeeping is kept.
- Periodically review the program/procedures and update them as needed.
- Maintain a list of UW Certified renovators.

VII. PROHIBITIVE WORK PRACTICES DURING ANY RENOVATION

- 1) Open-flame burning or torching of lead-based paints.
- 2) Use of machines that remove lead-based paint through high speed operations such as sanding, grinding, power planing, needle gun, abrasive blasting, or sandblasting, unless such machines are used with HEPA exhaust control.
- 3) Operating a heat gun on lead-based paint at temperatures of 1100 degrees Fahrenheit or higher.

Note: For pre-1978 properties with lead-based paint that receive Federal housing assistance (HUD), extensive dry scraping and sanding by hand, paint stripping in poorly ventilated spaces using volatile paint stripper is prohibited.

VIII. PRE-RENOVATION REQUIREMENTS

A. Notifications

- 1) Provide the “Renovate Right” pamphlet to owners/residents prior to renovation activities in pre-1978 housing and child-occupied facilities (See Appendix C).
- 2) Get written verification that the pamphlet has been received (i.e., at the back of the pamphlet). This can be done by certified mail, return receipt request at least 7 days before the renovation begins. Keep this verification in files and send a copy to RMSO (See Appendix D).
- 3) Let parents/guardians of children using a child-occupied facility know about the renovation.
- 4) If work in homes is done, this notification must be done no more than 60 days before beginning a renovation.
- 5) In the case that work is done in common areas, the pamphlet must be provided no more than 60 days before beginning renovation. Firms must provide written notification to all residents in the affected units of the property being renovated, must notify affected residents about where information is posted if work in nearby common areas will affect them. Posted information in common areas shall include: 1) Describing the nature and location of the work, 2) Listing the work start and end dates, and 3) Provide the tenants the “Renovate Right” pamphlet.

B. Lead Testing

- 1) Paint testing must be performed prior to renovation on all surfaces to be affected by the work, or the presumption is made that the paint is lead based.
- 2) Use EPA-recognized test kits to check for lead-based paint. These kits must be able to determine whether or not lead-based paint is present. Each building component to be renovated or disturbed by renovation must be tested, unless the component is part of a larger component system and is representative of the whole system. In this case, a single component may represent the larger system. In other words, a stair tread may represent the whole stair system if the painting history of both is similar.

C. Lead Results

A testing report of results from use of an EPA-recognized test kit must be submitted to the client as soon as possible, but no later than 30 days after completing the renovation.

This report contains the following information:

- Manufacturer and model of the EPA-recognized test kit.
- A description of the components tested.
- The location of components tested.
- Results of the testing.
- Retain copy of the test kit documentation form.

Please refer to Appendix B for a copy of this report form.

D. Postings

Firms must post signs clearly defining the work area and warning occupants and other persons not involved in renovation activities to remain outside of the work area. These signs should be in the language of the occupants. If it is an exterior job, establish a 20 foot perimeter around the work area if space permits. Refer to Appendix E for what these signs should look like.

IX. INTERIOR RENOVATION REQUIREMENTS

A. Setting Up

- 1) Remove all objects from the work area or cover them with plastic sheeting with all seams and edges sealed.
- 2) Close and cover all ducts opening in the work area with taped-down plastic sheeting. It is recommended that the HVAC unit be shut down.
- 3) Close windows and doors in the work area. Doors must be covered with plastic sheeting (two layers of protective sheeting). Follow the steps below:
 - a) Cut the first plastic sheeting layer slightly wider and longer (three inches) than the door frame.
 - b) Make a small "S" fold at the top of the sheeting and tape it to the top of the door frame. Make a similar "S" fold at the bottom of the sheeting and tape it to the floor. This will ensure that the plastic is not taut.
 - c) Secure the top corners to the door frame for reinforcement.
 - d) For exiting and entering the room, tape a vertical line about the size of a man from floor to header on both sides of the plastic. Cut a long vertical slit through the tape, in the middle of the protective sheeting. Leave about 6 inches at the top and bottom uncut. Reinforce the top and bottom of the slit with tape to prevent the plastic from tearing.
 - e) Tape a second layer of protective sheeting to the top of the door frame. This layer is cut slightly shorter than the door frame so that it will hang down flat against the first sheet of plastic.
 - f) Tape and secure the top corners of the second layer to the door frame and the first layer. Leave it to hang over the first layer. Weight the bottom of the flap with a dowel to keep it in place. If needed, another weighted flap can be added to the other side of the door to provide a third layer of plastic sheeting.
- 4) Cover the floor surface with taped-down plastic sheeting in the work area a minimum of six feet beyond the perimeter of surfaces undergoing renovation or a sufficient distance to contain the dust, whichever is greater. Recommended practices include:
 - 1) laying plastic sheeting in high traffic areas, 2) taking special precautions for

carpets, 3) using a disposable tack pad at the edge of protective sheeting, and 4) if using a chemical stripper, add 2nd plastic layer.

- 5) Use precautions to ensure that all personnel, tools, and other items, including the exteriors of containers of waste, are free of dust and debris when leaving the work area.
- 6) Do not allow residents or pets near the work area.
- 7) Do not allow eating, drinking, or smoking in the work area.

B. Cleaning

- 1) Collect all paint chips and debris, and seal it in a heavy-duty bag (black).
- 2) Mist, remove, fold (dirty side in) and tape or seal protective sheeting. Remove and dispose of protective sheeting as waste. Note: plastic sheeting between non-contaminated rooms and work areas must remain in place until after cleaning and removal of other sheeting.
- 3) Clean all objects and surfaces in the work area and within two feet of the work area in the following manner:
 - a. Clean walls starting at the ceiling and working down to the floor by either vacuuming with a HEPA vacuum or wiping with a damp cloth.
 - b. Thoroughly vacuum all remaining surfaces and objects in the work area, including furniture and fixtures, with a HEPA vacuum.
 - c. Wipe all remaining surfaces and objects in the work area with a damp cloth except for carpeted or upholstered surfaces (use HEPA with beater bar), Change cloths frequently. Mop uncarpeted floors thoroughly using a mopping method that keeps the wash water separate from the rinse water, or using a wet mopping system. Clean 2 feet beyond the contained work area.

C. Verification of Clean

- 1) Certified renovator must perform a visual inspection.
- 2) Put on disposable foot covers before entering the work area.
- 3) Make sure there is adequate lighting.
- 4) Is dust, debris or residue present? If so, the area must be re-cleaned and another visual inspection performed.
- 5) Certified renovator must wipe all uncarpeted floors, countertops, and windowsills within the work area with a wet disposable cleaning cloth. Is the cloth used for any area darker than the cleaning verification card? If so, the areas that have failed must be re-cleaned and a new wet disposable cleaning cloth must be used to wipe those areas again. If the cloth used is not darker, the work area has been adequately cleaned and warning signs may be removed. If it is still darker, wait until either the area has dried completely or 1 hour has passed, whichever is longer. Once dry, wipe that area with an electrostatic charged, white, disposable

cloth designed to be used for cleaning hard surfaces. Then the warning signs can be removed and the job is considered complete.

- 6) At the end of the renovation, the Certified Renovator must sign a report including the following information:
 - Name of certified renovator assigned to lead the project.
 - Copy of certified renovator certifications.
 - Certification from a certified renovator of non-certified worker training, and a list of topics covered.
 - Certification of posting of warning signs (i.e., pictures).
 - Description of chemical spot testing if performed.
 - Certification by the certified renovator of work area containment, on-site waste containment and transport, proper post renovation work area cleaning, and of successful cleaning verification.
 - Clearance report if performed.

X. EXTERIOR RENOVATION REQUIREMENTS

A. Setting Up

- 1) Close all doors and windows within 20 feet of the renovation. On multi-story buildings, close all doors and windows within 20 feet of the renovation on the same floor as the renovation, and close all doors and windows on all floors directly below the area designated as the work area.
- 2) Ensure that doors within the work area that will be used while the job is being performed are covered with plastic sheeting in a manner that allows workers to pass through while confining dust and debris.
- 3) Cover the ground with plastic sheeting or other disposable impermeable material extending a minimum of 10 feet beyond the perimeter or a sufficient distance to collect falling paint debris, whichever is greater. Pay special attention and cover nearby vegetable gardens and children's play areas. Note: plastic drop cloths do not take the place of protective sheeting on the ground.
- 4) In situations such as where work areas are in close proximity to other buildings, windy conditions, etc., the renovation firm must take extra precautions in containing the work area, like vertical containment. It is not advisable to perform dust creating activities on windy days. Extra precautions include creating a wind screen of plastic at the edge of the ground-cover plastic to keep dust and debris from migrating. Also, more frequent clean-up of exterior work areas.
- 5) Do not allow residents or pets near the work area.
- 6) Do not allow eating, drinking, or smoking in the work area.

B. Cleaning

- 1) Collect all paint chips and debris, and seal it in a heavy-duty bag.
- 2) Remove and dispose of protective sheeting as waste.
- 3) Waste transported from renovation activities must be contained to prevent release of dust and debris.

C. Verification of Clean

- 1) A certified renovator must perform a visual inspection. Is dust, debris or residue present?
- 2) If so, conditions must be eliminated and another visual inspection must be performed.
- 3) If no dust, debris or residue remains, the area has been adequately cleaned and warning signs can be removed.
- 4) At the end of the renovation, the Certified Renovator must sign a report including the following information:
 - a. Name of certified renovator assigned to lead the project.
 - b. Copy of certified renovator certifications.
 - c. Certification from a certified renovator of non-certified worker training, and a list of topics covered.
 - d. Certification of posting of warning signs (i.e., pictures).
 - e. Description of chemical spot testing if performed.
 - f. Certification by the certified renovator of work area containment, on-site waste containment and transport, proper post renovation work area cleaning, and of successful cleaning verification.
 - g. Clearance report if performed.

Note: a dust clearance exam is required for HUD facilities.

XI. WASTE FROM ANY RENOVATION

- 1) Must be contained to prevent releases of dust and debris before the waste is removed from the work area for storage or disposal.
- 2) Follow a “top to bottom, back your way out” approach so it is not necessary to re-enter an area that has already been cleaned.
- 3) The term “all surfaces” includes all vertical surfaces such as walls and windows, and all horizontal surfaces such as floors, door tops, moldings, window troughs, and window sills.
- 4) At the end of each work day and at the conclusion of the renovation, waste that has been collected from renovation activities must be stored to prevent access to and the release of dust and debris. Bag and “gooseneck seal” all waste in heavy duty plastic bags.
- 5) Transportation of waste from renovation activities must be contained to prevent release of dust and debris.

A. Waste Water

- 1) Water used for cleanup should be filtered and dumped in a toilet (if allowed by local rules).

- 2) Filter waste water through a 5-micron filter.
- 3) Never dump waste water down a sink, tub, storm-drain or on the ground.

XII. PERSONAL PROTECTIVE EQUIPMENT AND WORK PRACTICES

- 4) Painters hat
- 5) Disposable coveralls
- 6) Respiratory protection (N-100, R-100, P-100 respirator)
- 7) No eating, drinking, or smoking in work area.
- 8) Clean as you work.
- 9) Clean yourself and tools when leaving the worksite. This includes shoe covers, coveralls, and gloves. Wash hands and face at the end of the work shift.
 - Disposing of all used disposable clothing in plastic bags.
 - Making sure you are not bringing home lead. Launder work clothes separately.
 - If you cannot clean yourself at the work site get a piece of plastic to protect the floor and seat of your car from lead contamination. Take a shower and thoroughly wash your hair before playing with children.

XIII. RECORDKEEPING

All records (i.e., notices, evaluations, and clearance/abatement reports) must be retained and made available to the EPA, upon request, for 3 years following completion of work. HUD also has this requirement.

Copies of the following on-the-job records will be kept within the department with a copy sent to RMSO:

- Certified Firm and Certified Renovator certifications (must be onsite) (Appendix A).
- Lead-based paint testing results when an EPA recognized test kit is used.(Appendix B).
- Notification Materials (Appendix C).
- Proof of owner/occupant pre-renovation education (must have written proof of receipt or mailing) (Appendix D)
- Signs and notices postings(Appendix E)
- Non-certified worker training documentation (if applicable) (Appendix F)
- Lead Project Post-Renovation Report (Appendix G)

Appendix A: Examples of Certified Firm and Certified Renovator Certifications



Appendix B: Lead-Based Paint Testing Results Form

Lead Quick Check Monitoring

Test Kit Documentation Form

Owner Information

Name of Owner/Occupant: _____
 Address: _____
 City: _____ State: ____ Zip code: _____ Contact #: (____) ____-____
 Email: _____

Renovation Information

Fill out all of the following information that is available about the Renovation Site, Firm, and Certified Renovator

Renovation Address: _____ Unit # _____
 City: _____ State: ____ Zip code: _____
 Certified Firm Name: _____
 Address: _____
 City: _____ State: ____ Zip code: _____ Contact #: (____) ____-____
 Email: _____
 Certified Renovator Name: _____ Date Certified: ____ / ____ / ____

Test Kit Information

Use the following blanks to identify the test kit or test kits used in testing components.

Test Kit # 1

Manufacturer: _____ Manufacture Date: ____ / ____ / ____
 Model: _____ Serial #: _____
 Expiration Date: _____

Test Kit # 2

Manufacturer: _____ Manufacture Date: ____ / ____ / ____
 Model: _____ Serial #: _____
 Expiration Date: _____

Test Kit # 3

Manufacturer: _____ Manufacture Date: ____ / ____ / ____
 Model: _____ Serial #: _____
 Expiration Date: _____

Appendix C: Notification Materials



Appendix D: Proof of Owner/Occupant Pre-Renovation Education

This sample form may be used by firms to document compliance with the requirements of the Federal Lead-Based Paint Renovation, Repair, and Painting Program after April 2010.

Occupant Confirmation

Pamphlet Receipt

- (A) I have received a copy of the lead hazard information pamphlet informing me of the potential risk of the lead hazard exposure from renovation activity to be performed in my dwelling unit. I received this pamphlet before the work began.

Owner-occupant Opt-out Acknowledgement

- (A) I confirm that I own and live in this property, that no child under the age of 6 resides here, that no pregnant women resides here, and that this property is not a child –occupied facility.

Note: A child resides in the primary residence of his or her custodial parents, legal guardians, foster parents, or informal caretaker in the child lives and sleeps most of the time at the caretaker’s residence.

Note: A child-occupied facility is a pre-1978 building visited regularly by the same child, under 6 years of age , on at least two different days within any week, for at least 3 hours each day, provided that the visits total at least 60 hrs annually.

If Box A is checked, check either Box B or Box C, but not both.

- (B) I request that the renovation firm use the lead-safe work practiced required by EPA’s Lead –Based Paint Renovation, Repair, and Painting Rule; or
- (C) I understand that firm performing the renovation will not be required to use lead-safe work practices required by EPA’s Lead –Based Paint Renovation, Repair, and Painting Rule.

Printed Name of Owner-occupant

Signature of Owner-occupant

Signature Date

Renovator’s Self Certification Option (for tenant-occupied dwellings only)

Instructions to Renovator: If the lead hazard information pamphlet was delivered but a tenant signature was not obtainable, you may check the appropriate box below.

- Declined** – I certify that I have made a good faith to deliver the lead hazard information pamphlet to the rental dwelling unit listed below at the time indicated and that the occupant declined to sign confirmation or receipt. I further certify that I have left a copy of the pamphlet at the unit with the occupant.
- Unavailable signature** – I certify that I have made a good faith effort to deliver the lead hazard information pamphlet to the rental dwelling unit listed below and that the occupant was unavailable to sign the confirmation of receipt. I further certify that I have left the copy of the pamphlet at the unit by sliding it under the door or by (fill in how pamphlet was left). _____

Printed Name of Person Certifying Delivery

Attempted Delivery Date

Signature of Person Certifying Lead Pamphlet Delivery

Unit Address

Note Regarding Mailing Option – As an alternative to delivery in person, you may mail the lead hazard information pamphlet to the owner and/or tenant. Pamphlet must be mailed at least 7 days before renovation. Mailing must be documented by a certificate from the post office.

Appendix D: Proof of Owner/Occupant Pre-Renovation Education (continued)

Renovation Notice – For use in notifying tenants of renovation in common areas of multi-family housing.

The following renovation activities will take place in the following locations:

Activity (e.g., sanding, window replacement)

Location (e.g. lobby, recreation center)

The expected starting date is _____ and the expected ending date is _____.

Because this is an older building build before 1978, some of the paint disturbed during the renovation may contain lead. You may obtain a copy of the pamphlet, *Protect Your Family From Lead in Your Home*, by telephoning me at _____.

Please leave a message and be sure to include your name, phone number and address. I will either mail you a pamphlet or slide one under your door.

Date

Printed name of renovator

Signature of the renovator

Record of Tenant Notification Procedures – *Procedures Used for Delivering Notices to Tenant of Renovation in Common Areas*

Project Address: _____

Street (apt.#) _____

City _____ State _____ Zip Code _____

Owner of multi-family housing

Number of dwelling units

Method of delivering notice forms (e.g. *delivery to units, delivery to mailboxes of units*)

Name of person delivering notices

Signature of person delivering notices

Date of Delivery

Appendix E: Signs and Notices Postings



Appendix F: Non-Certified Worker Training Documentation

Module 8: Training Non-Certified Renovation Workers

Certified Renovators are responsible for teaching lead-safe work practices to non-certified renovation workers.

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8-1

Teaching Lead Safe Work Practices Means:

- Training workers to properly use signs, dust barriers, dust minimizing work practices, and dust cleanup practices during the course of renovation, repair, and painting activities to prevent and/or reduce potentially dangerous dust-lead contamination in the home.
- To effectively train workers you need to:
 - Know lead safety yourself.
 - Show students what you know.
 - Review the shopping list in *Steps to LEAD SAFE Renovation, Repair, and Painting* and have appropriate materials at hand.

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8-2

The Role of the Certified Renovator

Certified Renovators:

- Perform lead safe work as described in the RRP Rule.
- Train all non-certified workers in lead safe practices.
- Provide onsite and regular direction for all non-certified workers during setup and cleanup.
- Are available by phone when not physically present at the work site during work.
- Maintain onsite proof of certification as a Certified Renovator and training records for all non-certified renovation workers.

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8-3

Appendix F: Non-Certified Worker Training Documentation (continued)

Role of Trained, Non-Certified Renovation Workers

- Trained, non-certified renovation workers are persons, working on renovation, repair and painting jobs who have had on-the-job training or similar classroom training from a Certified Renovator to perform tasks in conformance to the EPA RRP Rule.
- They must perform lead-safe work practices as described in the RRP rule:
 - Protect the home by “setting up” the work area.
 - Protect themselves.
 - Perform renovation work safely.
 - Prohibited Practices must not be used.
 - Control dust and debris.
 - Clean the work area.



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Use the “Steps” Guide



- *Steps to LEAD SAFE Renovation, Repair and Painting* covers basic lead safe practices and can be used as a training guide outside of the classroom in conjunction with on-the-job demonstrations and hands-on training.
- It is strongly recommended that you use this guide as a basis for training.



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Steps to LEAD SAFE Renovation, repair and Painting is located on the RMSO website at:
<http://www.uwyo.edu/risk/safety/occupational/lead>

Appendix G: Renovation Recordkeeping Checklist

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OF WYOMING

		Environmental Health & Safety Main Office, Merica Hall Room 323 Phone: (307) 766-3277 Fax: (307)766-6116
		Regulated Materials Management Center Phone: (307)766-3696 Fax: (307)766-3699 Web: www.uwyo.edu/chs Email: UW-EHS@uwyo.edu

RENOVATION, REPAIR, AND PAINTING CHECKLIST DOCUMENTATION

For each job that is done, the following needs to be filled out completely. One copy needs to stay in the point person's file and the other needs to be sent to EHS. Please keep all associated photographs and test kit documentation also.

Name of Firm: _____

Date and Location of Renovation: _____

Brief Description of Renovation: _____

Name of Assigned Renovator: _____

Name(s) of Trained Worker(s), if used: _____

Name of Dust Sampling Technician, Inspector, or Risk Assessor, if used: _____

<input type="checkbox"/> Copies of renovator and dust sampling technician qualifications (training certificate, certifications) on file.		
<input type="checkbox"/> Certified renovator provided training to workers on (check all that apply):		
<input type="checkbox"/> Posting warning signs	<input type="checkbox"/> Maintenance containment	<input type="checkbox"/> Setting up plastic containment barriers
<input type="checkbox"/> Waste handling	<input type="checkbox"/> Avoiding spread of dust to adjacent areas	<input type="checkbox"/> Post-renovation cleaning
<input type="checkbox"/> Test kits used by certified renovator to determine whether lead was present on components affected by renovation (identify kits used and describe sampling locations and results): _____		
<input type="checkbox"/> Warning signs posted at entrance to work area		
<input type="checkbox"/> Work area contained to prevent spread of dust and debris		
<input type="checkbox"/> All objects in the work area closed and covered (interiors) <input type="checkbox"/> HVAC ducts in the work area closed and covered (interiors) <input type="checkbox"/> Windows in the work area closed (interiors) <input type="checkbox"/> Windows in and within 20 feet of the work area closed (exteriors) <input type="checkbox"/> Doors in the work area closed and sealed (interiors) <input type="checkbox"/> Doors in and within 20 feet of the work area closed and sealed (exteriors) <input type="checkbox"/> Doors that must be used in the work area covered to allow passage but prevent spread of dust <input type="checkbox"/> Floors in the work area covered with taped down plastic (interiors) <input type="checkbox"/> Ground covered by plastic extending 10 feet from work area – plastic anchored to building and weighed down by heavy objects (exteriors) <input type="checkbox"/> In necessary, vertical containment installed to prevent migration of dust and debris to adjacent property (exteriors)		
<input type="checkbox"/> Waste contained on-site and while being transported off-site		
<input type="checkbox"/> Work site properly cleaned after renovation		
<input type="checkbox"/> All chips and debris picked up, protective sheeting misted, folder dirty side inward, and taped for removal	<input type="checkbox"/> Work area surfaces and objects cleaned using HEPA vacuum and /or wet cloths or mops (interiors)	
<input type="checkbox"/> Certified renovator performed post-renovation cleaning verification (describe results, including the number of wet and dry cloths used): _____		
<input type="checkbox"/> If dust clearance performed instead, attach a copy of report.		

I certify under penalty of law that the above information is true and complete.

Name (signature) and title

Date

Appendix H: Shopping List for Required Materials and PPE

1. Signs
2. Barrier tape, rope, or fencing
3. Cones
4. Heavy duty plastic sheeting
5. Tape (duct or painters tape)
6. Stapler
7. Utility Knife or scissors
8. Protective eye wear
9. Painters hat
10. Disposable coveralls
11. Disposable N-100/P-100 rated respirator
12. Disposable latex/rubber gloves
13. Disposable shoe covers
14. Wet-dry sandpaper, sanding sponge
15. Misting bottle or pump sprayer
16. High efficiency Particulate air (HEPA) vacuum cleaner
17. Heavy duty plastic bags
18. Tack pads (large, sticky pads that help remove dust), paper towels, or disposable wipes.
19. Low temperature heat gun (under 1,100 degrees Fahrenheit)
20. Chemical strippers without methylene chloride
21. Power tools with HEPA filter equipped vacuum attachments
22. Detergent or general-purpose cleaner
23. Mop and disposable mop heads
24. Two buckets or one two-sided bucket with a wringer
25. Shovel and rake
26. Wet mopping system
27. Electrostatically charged dry cleaning cloths