

Lead Rule Compliance Resources

Various regional offices of the U.S. Environmental Protection Agency have begun inspections and enforcement actions on the Lead: Renovation, Repair, and Painting rule.

Remodelers working in pre-1978 homes must follow the rule or risk fines and litigation for regulation violations.

NAHB has provided information and resources for understanding and following the rule at www.nahb.org/leadpaint.

Be Aware and Be Ready!

The U.S. Environmental Protection Agency (EPA) is conducting inspections upon all types contractors (remodelers, window replacement firms, HVAC installers, insulation installers, etc.) working in pre-1978 housing units (i.e., owner occupied and rental housing) subject to EPA's lead-based paint regulations.

It is critical that contractors know the recordkeeping requirements of EPA's two primary lead-based paint rules:

1. Pre-Renovation Education and Renovation, Repair, and Painting Rule, and
2. Lead: Renovation, Repair, and Painting Rule (LRRP Rule).

Know what EPA inspectors are looking for:

EPA inspectors are looking for copies of documentation under both lead rules necessary to demonstrate compliance. Under both the Pre-Renovation Disclosure Rule and the LRRP Rule contractors must maintain records demonstrating compliance for three years.

What documents must I have for an EPA inspector as a contractor?

If you are a contractor working in pre-1978 housing units (owner-occupied

or rental housing) AND you perform activities that result in the disturbance of a painted surface of equal to or greater than six square feet (interior) or twenty square feet (exterior) you must be able to demonstrate compliance to an EPA inspector (in a non-EPA delegated state) or state inspector (see list of EPA-approved states) by producing the following records:

- Signed copies (by the home owner/tenant) of EPA's Pre-Renovation Disclosure Form that affirms they have received pre-renovation education in the form of the EPA's Renovate Right Pamphlet.
- If your work regularly results in the disturbance of painted surfaces in Pre-1978 homes you are likely subject to EPA's LRRP rule which means you will need to become BOTH an EPA "Certified Renovator" and an EPA "Certified Firm." Learn more about the requirements of the lead rule and how to achieve these certifications.
- Under EPA's LRRP Rule contractors must be able to produce for inspection copies of the following THREE documents for each job subject to the LRRP Rule:
 - Copy of Firm Certification by EPA or state (for EPA-Delegated States)
 - Copy of "Certified Renovator Certificate" received from EPA or State (for EPA-Delegated States).
 - Copy of the Certified Renovator's Report for EACH JOB subject to the LRRP Rule. This includes information on any EPA-Approved Pre-Renovation Test Kits used only by the "Certified Renovator" to determine applicability of the LRRP Rule and the Sample Record Keeping Checklist.

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