

proActive Safety Services RRP Lead Renovator Form Packet





RRP Form Checklist

Prior to the Job Beginning

- □ **Sample Pre-Renovation Form** Issue the Renovate Right Pamphlet At least 7 days prior for an EPA regulated job and at least 15 days prior to a HUD regulated Job.
- □ Sample Renovation Recordkeeping Checklist Fill this out upon notice of job award. You will keep this on-site until the end of the job. Attach any relevant correspondence from your customer as the job goes. At the end of the job this will become your post renovation report.
- □ Renovation Notice Form only needed for work in Apartments, Condominiums, and common areas. Distribute these to each affected tenant at least 7 days prior EPA, or 15 days prior for HUD. Also use this form as a template for the signs you will post in conspicuous areas (front door, back door, mail location, etc.).
- Record of Tenant Notification Procedures Form only need for work in Apartments, Condominiums, and common areas.
 Use the form to record how you distributed the Renovation Notice
- Steps Guide Student Training Record Complete this form for any worker that you train on the job or prior to the job in a classroom setting. Non-certified trained workers can only be trained for EPA regulated jobs. Unless you are a Lead Abatement supervisor and will not leave the project.

During the Job

- □ **Job Safety Analysis Form** Complete this each day prior to work beginning. At the end of the day snap a photo of it and email it to your Supervisor.
- □ **Test Kit Documentation Form** Complete this anytime you test for lead-based paint. Retain a copy on the job and send a copy to the customer when you send your bill, or within 30 days. Whichever is sooner.
- □ **Paint Chip Sample Collection Form** Complete this anytime you take a paint chip sample. Retain a copy on the job and send a copy to the customer when you send your bill, or within 30 days. Whichever is sooner.
- Cleaning Verification Procedure Documentation Form This is an optional form that can be used to record the Cleaning Verification Procedures.

After the Job

- □ Post Renovation Report Complete and sign the Sample Renovation Recordkeeping Checklist. Attach any relevant correspondence. Include a copy of the Renovation Recordkeeping Checklist along with the following items:
 - Completed
 - Firm Certification
 - All Renovator Certifications
 - All 3rd Party Certifications
 - Completed Steps Guide Student Training Record
 - Pre-Renovation Form or Certified Mail Slips
 - Record of Tenant Notification Procedures
 - Applicable Job Safety Analysis Forms
 - Completed Test Kit Documentation Forms
 - Completed Paint Chip Sample Collection Form
 - Optional Completed Cleaning Verification Procedure Form



Sample Renovation Recordkeeping Checklist

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:
Copies of renovator and dust sampling technician qualifications (training certificates, certifications) on file.
Certified renovator provided training to workers on (check all that apply):
Posting warning signs Setting up plastic containment barriers
Maintaining containment Avoiding spread of dust to adjacent areas
Waste handling Post-renovation cleaning
Test kit or test results from an EPA-recognized laboratory on collected paint chip sample, used by certified renovator to determine whether lead was present on components affected by renovation (identify method used, type of test kit used (if applicable), laboratory used to conduct paint chip analysis, describe sampling locations and results):
Warning signs posted at entrance to work area.
Work area contained to prevent spread of dust and debris
All objects in the work area removed or covered (interiors)
HVAC ducts in the work area closed and covered (interiors)
Windows in the work area closed (interiors)
Windows in and within 20 feet of the work area closed (exteriors)
Doors in the work area closed and sealed (interiors)
Doors in and within 20 feet of the work area closed and sealed (exteriors)
Doors that must be used in the work area covered to allow passage but prevent spread of dust
Floors in the work area covered with taped-down plastic (interiors)
Ground covered by plastic extending 10 feet from work area—plastic anchored to building and
weighed down by heavy objects (exteriors)
Vertical containment installed if property line prevents 10 feet of ground covering, or if necessary to preven migration of dust and debris to adjacent property (exteriors)
Waste contained on-site and while being transported off-site.
Work site properly cleaned after renovation
All chips and debris picked up, protective sheeting misted, folded dirty side inward, and taped for removal
Work area surfaces and objects cleaned using HEPA vacuum and/or wet cloths or mops (interiors)
Certified renovator performed post-renovation cleaning verification (describe results, including the number of wet and dry cloths used):
If dust clearance testing was performed instead, attach a copy of report
I certify under penalty of law that the above information is true and complete.
Name and title Date

EPA Certified Renovation Firms and Certified Renovators Additional Requirements of HUD's Lead Safe Housing Rule

abate them. This approach requires certified abatement contractors perform the abatement part of the job.

These approaches also include all the basic HUD requirements describe in the slide presentations in Module 2. They clearly demonstrate the importance to the renovator of asking the client whether federal housing assistance is provided for the project.

The differences between HUD's LSHR and the Environmental Protection Agency's (EPA's) Renovation, Repair and Painting (RRP) regulation, part of EPA's regulations at 40 CFR Part 745, and the changes for HUD LSHR projects, are summarized in the following table and explained in the narrative after the table:

Differences between HUD LSHR and EPA RRP regulations

Stage of Job	Requirement	HUD LSHR	EPA RRP	Changes to LSHR Projects to Comply with RRP.
Planning and Set- Up	Determination that lead-based paint (LBP) is present.	EPA-recognized test kits cannot be used to say paint is <u>not</u> LBP. Only a certified LBP inspector or risk assessor may determine whether LBP is present.	Certified renovators use an EPA-recognized test kit to determine if RRP rule applies or not.	None.
	Training	HUD does not certify renovators or firms. HUD does not require that all workers be certified renovators. All workers and supervisors must complete a HUD-approved curriculum in lead safe work practices, of which RRP is one. All workers need this training except they only need on-the-job training for EPA if they are supervised by a certified LBP abatement supervisor who is also a Certified Renovator.	EPA or EPA- authorized States certify renovation firms and accredit training providers that certify renovators. Only the certified renovator is required to have classroom training. Workers must receive on-the-job training from the certified renovator.	Renovation firms must be certified. At least one certified renovator must be at the job or available when work is being done. (The certified renovator may be a certified LBP abatement supervisor who has completed the 4-hour RRP refresher course.)

EPA Certified Renovation Firms and Certified Renovators Additional Requirements of HUD's Lead Safe Housing Rule

Stage of Job	Requirement	HUD LSHR	EPA RRP	Changes to LSHR Projects to Comply with RRP.
	Pre-Renovation Education	HUD requires conformance with EPA regulations, including EPA's Pre-Renovation Education Rule. EPA had required renovators to hand out the EPA / HUD / CPSC Protect Your Family from Lead in Your Home (Lead Disclosure Rule) pamphlet.	Renovators must hand out the EPA/HUD Renovate Right: Important Lead Hazard Information for Families, Child Care Providers and Schools pamphlet. (This requirement went into effect on December 22, 2008.)	None.
During the Job	Treating LBP hazards	Depending on type and amount of HUD assistance, HUD requires that lead hazards be treated using "interim controls" or "ongoing leadbased paint maintenance."	EPA generally requires that renovations in target housing be performed using lead-safe work practices.	None.
	Prohibited Work Practices	HUD's prohibited work practices include EPA's prohibited work practices plus: dry scraping or sanding farther than 1 ft. of electrical outlets, and use of a volatile stripper in poorly ventilated space.	EPA prohibits work practices (open flame burning or torching, heat guns above 1100 degrees F, machine removal without HEPA vacuum attachment).	None.
	Threshold minimum amounts of interior paint disturbance which trigger lead activities.	HUD has a lower interior "de minimis" threshold (2 sq. ft. per room, or 10% of a small component type) than EPA for lead-safe work practices. HUD also uses this lower threshold for clearance and occupant notification.	EPA's interior threshold (6 sq. ft. per room) for minor repair and maintenance activities is higher than HUD's de minimis threshold.	None.

EPA Certified Renovation Firms and Certified Renovators Additional Requirements of HUD's Lead Safe Housing Rule

Stage of Job	Requirement	HUD LSHR	EPA RRP	Changes to LSHR Projects to Comply with RRP.
End of Job	Confirmatory Testing	HUD requires a clearance examination done by an independent party.	EPA allows cleaning verification by the renovator or clearance examination. The cleaning verification does not involve sampling and laboratory analysis of the dust.	None.
	Notification to Occupants (non-owner- occupied housing)	HUD requires the designated party to distribute notices to occupants within 15 days after lead hazard evaluation and control activities in their unit (and common areas, if applicable).	EPA requires that owners receive documentation after the renovation.	Contractor notifies owner as well as occupants.



Call Jeff 513-604-0858 or Simply enter your order qauntities and then email jabayer@msn.com



rder Qty	Part#	Description	Unit	Price	Total
		Lead Renovation Products			
		Call or email this form to Jeff Bayer with ABCO Safety to	order		
		(513) 604-0858 or jabayer@msn.com			
	10X100X04C	10'X100' Clear 4 Mil Poly Sheeting	RL	\$23.40	\$0.
	10X100X06C	10'X100' Clear 6 Mil Poly Sheeting	RL	\$34.85	\$0.
	12X100X04C	12'x100' Clear 4 Mil Poly Sheeting	RL	\$28.00	\$0.
	12X100X06C	12'X100' Clear 6 Mil Poly Sheeting	RL	\$42.50	\$0.
	20X100X04C	20'X100' Clear 4 Mil Poly Sheeting	RL	\$47.00	\$0.
	20X100X06C	20'X100' Clear 6 Mil Poly Sheeting	RL	\$70.00	\$0
	20X100X06C	20'X100' Clear 6 Mil Poly Sheeting	RL	\$70.00	\$0
	20x200x1.5	20x200x1.5mil clear Poly Sheeting	RL	\$37.25	\$0
	AC=006-SPANISH	Signs - Danger Lead Spanish 100/PK	PK	\$26.50	\$0
	AC=02SS1420CRW	Signs - Caution Lead 50/PK	PK	\$17.00	\$0
	ADHE=118A-2"	2" Blue Painters Tape 24/box	BX	\$137.00	\$0
	ADHE=CM2436	24"x36" Tack Matts 120/CS	BX	\$65.00	\$0
	ADHE=GP900-2	2" Duct Tape 24/BX	BX	\$82.50	\$0
	B12x100x6	12'X100'X6 Mil Black Poly Sheeting	RL	\$42.50	\$0
	BT=CAUTION	BARRICADE TAPE CAUTION	RL	\$6.95	\$0
	BT=DANGLEADHAZ	DANGER LEAD HAZARD TAPE	RL	\$6.95	\$0
	BUP36X60	Black heavy duty disposal bags 75/roll	RL	\$47.90	\$0
	CST=2068001	28" ORANGE TRAFFIC CONE	EA	\$18.25	\$0
	DISP=3519	Polypropelyne boot covers 200 cs	CS	\$27.50	\$0
	DISP=3714	Posi Wear heavy duty boot covers 200 cs	CS	\$100.00	\$0
	DISP=AB20-2XL	Hood & Boot Coveralls 2xl 25/BX	BX	\$56.00	\$(
	DISP=AB20-3XL	Hood & Boot Coveralls 3xl 25/BX	BX	\$56.00	\$0
	DISP=AB20-L	Hood & Boot Coveralls L 25/BX	BX	\$56.00	\$0
	DISP=AB20-XL	Hood &Boot Coveralls xl 25/BX	BX	\$56.00	\$(
	E=1402666-01	Replacement Hepa Filter / Vacuum	EA	\$74.00	\$0
	E=1407015-040	Replacement Bags 10/BX / Vacuum	BX	\$16.50	\$0
	E=141535-00	Replacement Pre-Filter / Vacuum	EA	\$7.10	\$0
	E=56649014	Electric Floor Powerhead / Vacuum	EA	\$289.50	\$(
	E=56649625	Air Driven Turbo Powerhead/Vacuum	EA	\$69.00	\$0
	E=UZ930	4 Gallon Hepa Dry Vacuum	EA	\$325.00	\$(
	GER2180	N100 Disposable Respirators 10 PER BOX	BX	\$37.00	\$(
	GL=960-L	YELLOW KPG PVC COATED GLOVES	PR	\$1.99	\$0
	GL=9688-L	FLEX TUFF II GLOVES LG	DZ	\$13.65	\$(
	GL=9688-XL	FLEX TUFF II GLOVES X LG	DZ	\$13.65	\$(
	GL=BE7005PF-L	NITRILE EXAM GLOVES LG 100/BX	BX	\$6.75	\$(
	GL=BE7005PF-XL	NITRILE EXAM GLOVES XL 100/BX	BX	\$6.75	\$(
	G00815	ROOFERS FALL PROTECTION KIT	EA	\$105.00	\$(\$(
	LC-48SCP3C	3M LEAD TEST SWAB 48/BOX	BX	\$99.00	\$(
	LEAD=5498	Lead Safe Wipes 90/Bottle 6/CS	BX	\$148.00	\$(
	N1022	CLEAR GOGGLES	EA		\$C
	PGC09060	Swiffer Sweeper Handle Assy. 3/case	CS	\$1.60 \$41.00	
	PGC33407		CS		\$0
		Swiffer Dry Refill Kit 6 boxes / case	CS	\$56.90	\$0
	PGC35154	Swiffer Wet Refill Kit 12 boxes/case		\$59.25	\$0
	PM=OF612HE	Replacement HEPA Filter/ OV1000A	EA	\$25.00	\$0
	PM=OV1000A	Small Lunchbox HEPA Vacuum	EA	\$209.00	\$0
	T=010	Utility Knife	BX	\$1.20	\$(
	T=011	Utility Knife replacement Blades 100/pkg	EA	\$8.50	\$(
	T=BOTTLE	32 OZ SPRAY BOTTLE W TRIGGER	EA	\$1.55	\$0
	Z=4PL	4 poles, 2 foam rails 1 zipper 1 carry bag	BX	\$223.00	\$0
	Z=KT-12	Zip Wall Pole Kit 12' Adjust 2/BX	BX BX	\$125.00 \$255.00	\$0 \$0
	Z=SLP6	6 PACK 12' ZIP WALL POLES			

Sample Pre-Renovation Form

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.

Occupant	Confirmation
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Description of the second of t	
Pamphlet Receipt	
I have received a copy of the lead hazard information plead hazard exposure from renovation activity to be perpamphlet before the work began.	
Printed Name of Owner-occupant	
Signature of Owner-occupant	Signature Date
Renovator's Self Certification Option (for tenant-occupied Instructions to Renovator: If the lead hazard information parabetainable, you may check the appropriate box below. Declined – I certify that I have made a good faith effort to the rental dwelling unit listed below at the date and the configuration of receipt I forther certify that I	amphlet was delivered but a tenant signature was not rt to deliver the lead hazard information pamphlet time indicated and that the occupant declined to
sign the confirmation of receipt. I further certify that I the occupant.	nave left a copy of the pamphlet at the unit with
Unavailable for signature – I certify that I have made information pamphlet to the rental dwelling unit listed sign the confirmation of receipt. I further certify that I sliding it under the door or by (fill in how pamphlet was	below and that the occupant was unavailable to have left a copy of the pamphlet at the unit by
Printed Name of Person Certifying Delivery	Attempted Delivery Date

Unit Address

Signature of Person Certifying Lead Pamphlet Delivery

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 of mailing from the post office.

Sample Forms (continued)

Renovation Notice — For use in notifying tenants of renovations in common areas of multi-family housing.				
The following renovation activities will take place in the	e following locations:			
Activity (e.g., sanding, window replacement)				
Location (e.g., lobby, recreation center)				
The expected starting date isand the expected ending date is Because this is an older building built before 1978, some of the paint disturbed during the renovation may contain lead. You may obtain a copy of the pamphlet, <i>Renovate Right</i> , 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 renovator				
Record of Tenant Notification Procedures				
Project Address				
Street (apt. #)				
CitySt	ateZip 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			

Job Safety Analysis Form

Supervisor {Print Name}:			Contractor	ontractor:			Date:							
Supervisor Signature:				Location of	ation of Work									
Task Activity 1: (For ea			(For each st	Potential Hazards (For each step, list all potential hazards here)				Recommended Safe Job Procedures (For each hazard, list safe procedures, PPE or tools needed here)						
Task Activity 2:				Potential Hazards (For each step, list all potential hazards here)			Recommended Safe Job Procedures (For each hazard, list safe procedures, PPE or tools needed here)							
Task Activity 3:				Potential Hazards (For each step, list all potential hazards here)			Recommended Safe Job Procedures (For each hazard, list safe procedures, PPE or tools needed here)			here)				
Α	Electrocution/Shock	Н	Hot Si	urfaces		0	Excava	tions	1		V	Chemicals (MSDS Review	<i>(</i>)	
В	Fall From Heights	ı	-	Points		Р	Lead P				W	Restricted Access/Confin		ce
С	Work Overhead	J		Particles		Q	Silica D				Х	Poor Lighting	· ·	
D	Lifting: Manual/Mechanical	К	Vehic	e Traffic		R	Asbest	os			Υ	Heat Stress/Cold Temper	atures	
Е	Rough/Sharp Material	L	Railwa	ay Traffic		S	Poor V	Vork Pos	ition		Z	Compressed Air		
F	Slippery/Uneven Surfaces	М		ng Fume		Т	Noise				AA	Repetitive Motion		
G	Machinery - Rotate/Moving	N		ng Arc		U		nable Ma	terials		ВВ	<u> </u>		
	ROTECTION PRECAUTIONS		1110.0.	PPE NEEDED							ļ	MENT SECURED		
		N	Υ	Face Shield				N	Υ		-	ection (GFCI)	N	Υ
	lankets	N	Υ	Safety Glasses				N	Υ	Lock Out/Ta		200.01. (2. 0.)	N	Υ
	ng Screens nables Removed	N	Y	Hearing Protection				N	Y	-		ds Inspected	N	Y
	le Fire Extinguishers	N	Υ	_	Jazard			N	Υ	High Voltage Lines Identified		N	Y	
	easured	N	Y	Gloves for Specific Hazard Rubber Boots			N	Υ	Hot Pipes Need Temp. insulation N		Y			
	ed Firewatcher Stationed	N	Υ	Hard Hat				N	Υ			N	Υ	
	TS REQUIRED			Fall Protection Equi	nment				Υ	WORK PLATFORMS FOR TASK				
Line B	·	N	Υ	Respiratory Protect	•			N	Υ	Scaffold Ne	eded/II	nspected	N	Υ
	ned Space Entry	N	Υ	Foot/Metatarsal Gu				N	Υ	JLG/Scissors	Lift In	spected (Oper. Cert.	N	Υ
Other		N	Υ	Safety Shower				N	Υ	Ladders (Ins	pected	l & Secured)	N	Υ
-		N	Υ	Eye Wash				N	Υ	Other			N	Υ
INTERI	OR CONTAINMENT			Electrical Flash Gear	r			N	Υ	EXTERIOR C	ONTAI	NMENT		
Signs	Posted?	N	Υ	Other				N	Υ	30ft Perimet	er and	Signs Posted?	N	Υ
Work	Area Entrances Sealed?	N	Υ	BARRICADES NEEDE	D			•		20ft All Door	rs and	Windows Closed?	N	Υ
6 ft Pc	oly established to contain dust?	N	Υ	Caution (Yellow)				N	Υ	10ft Poly est	ablishe	ed to contain dust?	N	Υ
HVAC	System Off and Sealed?	2	Υ	Danger (Red)		N	Υ	Are all tools	staged	on containment area?	N	Υ		
Tack F	ad and Runners in Place?	N	Υ	Hard Barricade				N	Υ	Within 10 ft	of pro	p line? Vertical Cont.?	N	Υ
NO	TE ALL CREW MEMBERS M	UST	SIGN	IN AND OUT	ON TH	IS FO	RM							
	w Daily Sign In							ign O	+					
	erstand the safety precautions and have	tho tr	ining t	a parform this tack						ive NOT been	iniuro	d		
	erstand the safety precautions and have ent free.	the tra	anning t	o perioriii tiiis task	Illav	e work	eu saiei	y touay	allu lla	ive NOT been	ilijure	u		

Test Kit Documentation Form

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Owner I	nform	nation
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Name of Owner/Occu Address:	ıpant:		
City: Email:	State:	Zip code:	Contact #: ()

Renovation Information

Fill out all of the following information that is available about the Renovation Site, Firm, and Certified Renovator.						
Renovation Address: City:			Unit#			
Certified Firm Name: Address:						
City:	_ State:	Zip code:	Contact #: ()			
Certified Renovator Nar			Date Certified: / /			

Test Kit Information

	Manufacture Date:
//	
Model:	Serial #:
Expiration Date:	
Test Kit #2	
Manufacturer:	Manufacture Date:
	Serial #:
Expiration Date:	
Test Kit #3	
Manufacturer:	Manufacture Date:
Model:	Serial #:
Expiration Date:	· · · · · · · · · · · · · · · · · · ·

Test Kit Documentation Form

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Renovation Address: _	01-1-	7' 1 -		Un	it#
City:	State:	_ Zıp code:			
Test Location # Description of compone				Test Kit # 2	Test Kit # 3
Result: Is lead present Date of test:/_		e) YES	NO	Presumed	
Test Location # Description of compone					Test Kit # 3
Result: Is lead present Date of test:/_	•	e) YES	NO	Presumed	
Test Location # Description of compone					Test Kit # 3
Result: Is lead present Date of test:/_		e) YES	NO	Presumed	
Test Location # Description of compone				Test Kit # 2	Test Kit # 3
Result: Is lead present Date of test:/_		e) YES	NO	Presumed	
Test Location # Description of compone		• • •	Test Kit # 1	Test Kit # 2	Test Kit # 3
Result: Is lead present Date of test:/_	•	e) YES	NO	Presumed	
Test Location # Description of compone				Test Kit # 2	Test Kit # 3
Result: Is lead present Date of test:/_		e) YES	NO	Presumed	

Paint Chip Sample Collection Form Client/Project Information

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Name of Owner/Project:			
Address:			······································
City:	_ State: Zip co	de: Contact # ()
Email:		_	
Renovation Information			
Fill out all of the following informa	tion that is available	about the Renovation Site, F	Firm and Certified
Renovation Address:			Unit #:
City:		Zip code:	
Certified Firm Name:			
Address:			· · · · · · · · · · · · · · · · · · ·
City: State:	Zip code	: Contact #: (_	
Email:			
Certified Renovator Name:			-
Date Certified//			
Paint Chip Sample Information			
For each sample collected, fill out	all of the following ir	nformation	
Sample Identifier:	-		
Sample Collector Name:			· · · · · · · · · · · · · · · · · · ·
Sampling Location:			
Sampling site description:		Date of Collection:	:/
Sample Dimensions (cm):	Cal	culate Sample Area (cm²) :	····
NLLAP-recognized entity and location	n:		· · · · · · · · · · · · · · · · · · ·
Submission date://	Results:	Result Date:	

Paint Chip Sample Collection Form

Renovation Address: _____ Unit #: _____ City: _____ State: ____ Zip code: _____ For each sample collected, fill out all of the following information Sample Identifier: Sample Collector Name: Sampling Location: _____ Sampling site description: ______ Date of Collection: ____/____ Sample Dimensions (cm): _____Calculate Sample Area (cm²):_____ NLLAP-recognized entity and location: Submission date: ___/___ Results: ____ Result Date: ___/___ For each sample collected, fill out all of the following information Sample Identifier: Sample Collector Name: Sampling Location: Sampling site description: ______ Date of Collection: ____/____ Sample Dimensions (cm): Calculate Sample Area (cm²): NLLAP-recognized entity and location: _____ Submission date: ___/____/ Results: ____/___/

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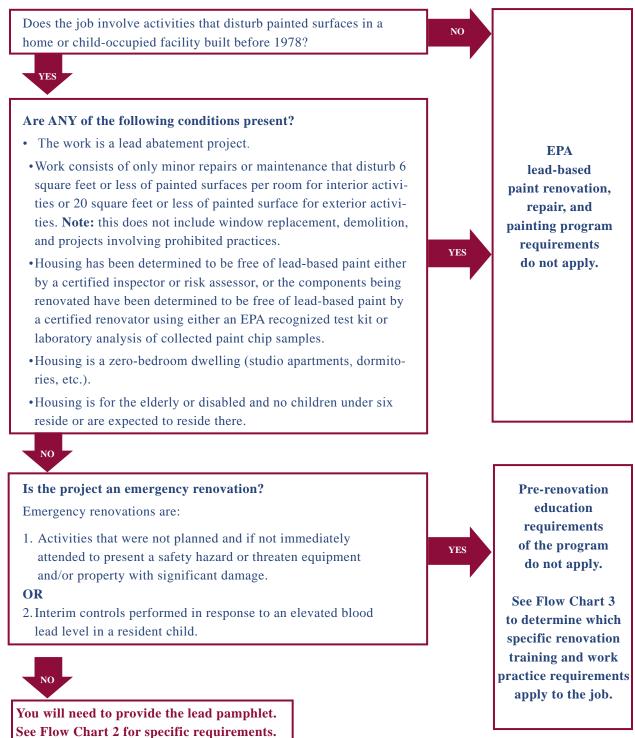
Steps Guide Student Training Record

Name of Trainee	Step 1: Determine if the Job Involves Lead- Based Paint	Step 3: Protect Yourself	Step 4: Minimize the	Step 5: Lead the Work Area Clean	Step 6: Control The Waste	Step 7: Verify Work Completion with the Cleaning Verification Procedure or Clearance
Trainer Name			Signatura			
Trainer Name			Signature			
Training Date						

EPA's Lead Program Rule At-A-Glance

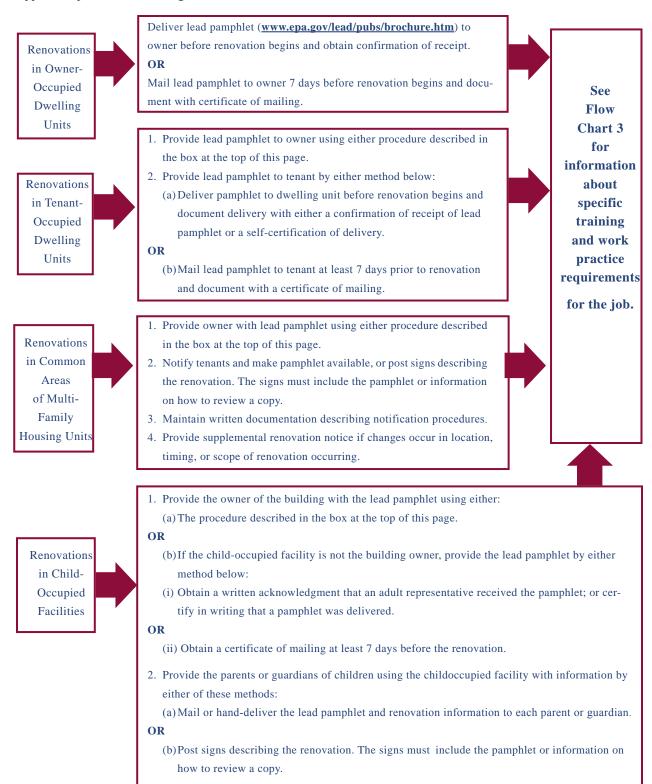
Do the Requirements Apply to the Renovation?

If you will be getting paid to do work that disturbs painted surfaces in a pre-1978 home, apartment building, or child-occupied facility, answer the questions below to determine if the EPA lead program requires you to distribute the lead pamphlet and/or if you will need to comply with training, certification, and work practice requirements when conducting the work.

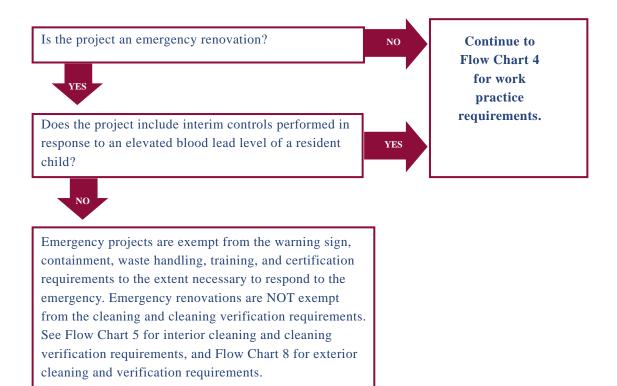


How Do I Comply with the Pre-Renovation Education Requirements?

Requirements to distribute pre-renovation educational materials vary based on the location of the renovation. Select the location below that best describes the location of your project, and follow the applicable procedure on the right.



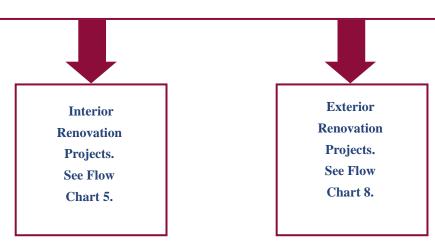
Do the Renovation Training and Work Practices Apply?



Work Practice Requirements

General

- (A) Renovations must be performed by certified firms using certified renovators.
- (B) 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.
- (C) Prior to the renovation, the firm must contain the work area so that no dust or debris leaves the work area while the renovation is being performed.
- (D) Work practices listed below are prohibited during a renovation:
 - 1. Open-flame burning or torching of painted surfaces;
 - 2. Use of machines that remove paint or other surface coatings through high speed operation such as sanding, grinding, power planing, needle gun, abrasive blasting, or sandblasting, unless such machines have shrouds or containment systems and are equipped with a HEPA vacuum attachment to collect dust and debris at the point of generation. Machines must be operated so that no visible dust or release of air occurs outside the shroud or containment system; and
 - 3. Operating a heat gun on painted surfaces at temperatures above 1100 degrees Fahrenheit.
- (E) Waste from renovations:
 - 1. Waste from renovation activities must be contained to prevent releases of dust and debris before the waste is removed from the work area for storage or disposal.
 - 2. At the conclusion 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.
 - 3. Waste transported from renovation activities must be contained to prevent release of dust and debris.



Work Practice Requirements Specific to Interior Renovations

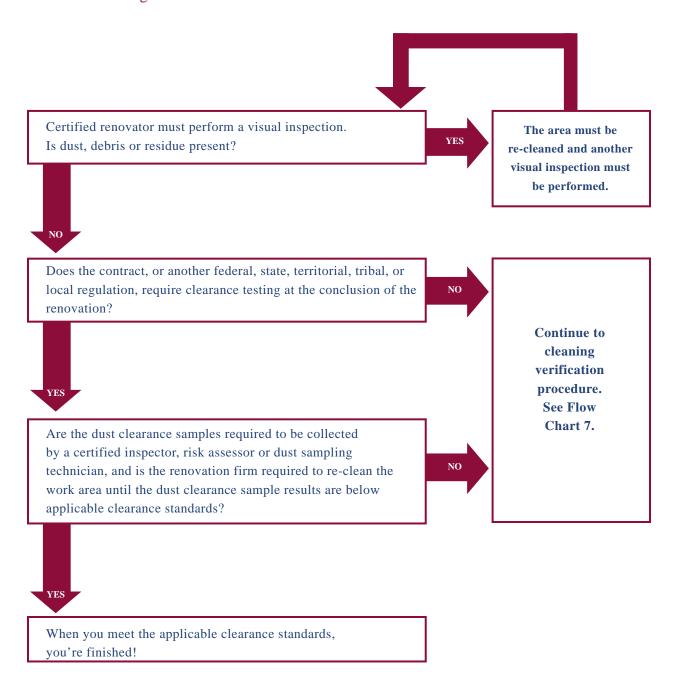
The firm must:

- (A) Remove all objects from the work area or cover them with plastic sheeting with all seams and edges sealed.
- (B) Close and cover all ducts opening in the work area with taped-down plastic sheeting.
- (C) Close windows and doors in the work area. Doors must be covered with plastic sheeting.
- (D) 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. If a vertical containment system is employed, floor covering may stop at the vertical barrier, providing it is impermeable, extends from floor to ceiling, and is tightly sealed at floors, ceilings, and walls.
- (E) 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.
- (F) After the renovation has been completed, the firm must clean the work area until no dust, debris or residue remains. The firm must:
 - 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. 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, except for carpeted or upholstered surfaces, with a damp cloth. Mop uncarpeted floors thoroughly using a mopping method that keeps the wash water separate from the rinse water, or using a wet mopping system.

Cleaning verification is required to ensure the work area is adequately cleaned and ready for re-occupancy.

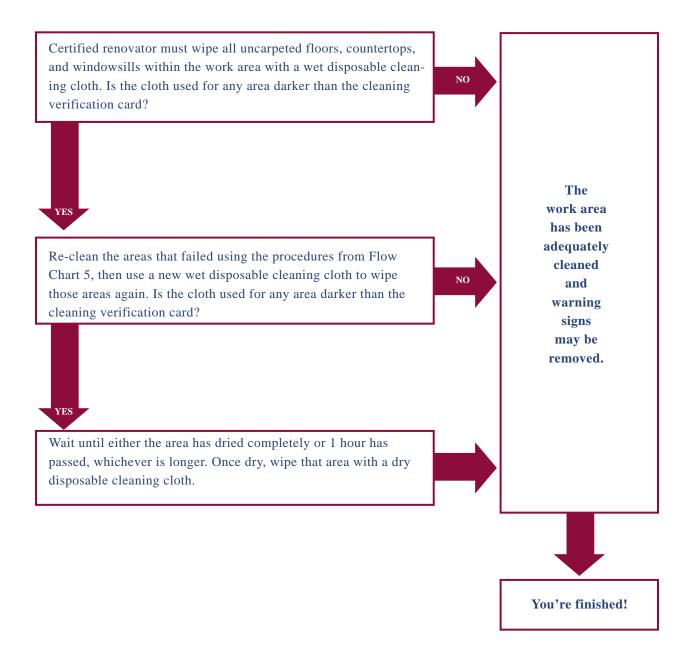
See Flow Chart 6 for instructions on performing cleaning verification for interior projects.

Interior Cleaning Verification: Visual Inspection and Optional Clearance Testing



Interior Cleaning Verification: Floors, Countertops, and Window Sills

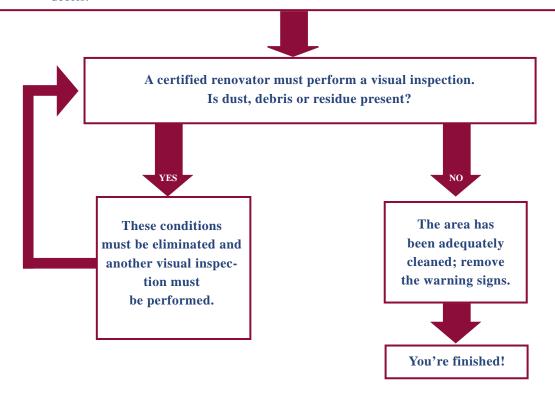
Note: For areas greater than 40 square feet, separate the area into sections and use a new disposable cleaning cloth for each section.



Work Practice Requirements Specific to Exterior Renovations

The firm must:

- (A) Close all doors and windows within 20 feet of the renovation.
- (B) 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.
- (C) 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. If a property line prevents 10 feet of such ground covering, then erect vertical containment or equivalent extra precautions to prevent contamination of adjacent buildings and property.
- (D) 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.
- (E) After the renovation has been completed, the firm must clean the work area until no dust, debris or residue remains. The firm must:
 - 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.



Cleaning Verification Recommended Instructions

In the event of a potential lead contamination claim it is a wise idea to document your cleaning verification procedure. Accomplishing this only takes a few extra steps per area that will provide visual evidence of your cleaning, area by area.

Procedures

- 1. Use masking or painters tape to mark each horizontal surface, and every 30 sqft on large horizontal surfaces including hard floors.
- 2. You can either write numbers on each piece of tape, or simply follow a top down, furthest point from entry to entry approach and number accordingly on the form.
- 3. Snap a photo of all of your pieces of tape. You can use this verify that you did indeed clean the correct number of areas. Also, this picture will provide you with visual evidence of your plan to complete the Cleaning Verification Procedure.
- 4. Starting with the piece of tape you labeled as 1. Use a new cleaning verification cloth and wipe the entire horizontal surface.
- 5. On a flat surface, lay your Cleaning Verification Card Down flat with the picture side up.
- 6. Lay the first cleaning verification wipe that was used to wipe the area labeled as 1 next to the cleaning verification card.
- 7. Pick up the cleaning verification card and use the window to scan over the first wipe to see if you can visually see any dirt or debris.
- 8. If you spot any dirt or debris, lay the cleaning verification card next to the first wipe. If you don't spot any dirt or debris you have passed the cleaning verification procedure and should take a picture of the wipe laid out next to the cleaning verification card.
- 9. With a new cleaning verification wipe, reclean the area that you labeled as 1.
- 10. Lay the 2nd cv cloth next to the 1st wipe and the Cleaning Verification Card.
- 11. Use the Cleaning Verification Card window to scan the 2nd cv coth for any dirt or debris.
- 12. If you find any dirt or debris you are suppossed to wait for the surfaces to dry, or 1 hour and clean again with an electrostatically charged cleaning cloth that is designed to clean hard surfaces.
- 13. If the 2nd cv cloth passes, lay the Cleaning Verification Card

Cleaning Verification Procedure Documentation Form

Renovation Information						
Project Name and Date						
Renovation Area					X	
Time In		Time Out				_
Designated Certified Renovator						
Picture	Item Number	Wipe 1	Wipe 2	Charged Cleaning	Item Description	
		Insert Initial Pict	ure Here	LIGER		
		□ Pass □ Fail	□ NotNeeded□ Pass □ Fail	□ NotNeeded□ Complete		
		□ Pass □ Fail	□ NotNeeded□ Pass □ Fail	□ NotNeeded□ Complete		

Picture	Item Number	Wipe 1	Wipe 2 Charged Cleaning Item Descriptio		
Ficture		□ Pass □ Fail	Wipe 2 □ Not Needed □ Pass □ Fail	□ Not Needed □ Complete	item bescription
		□ Pass □ Fail	□ NotNeeded□ Pass □ Fail	□ NotNeeded□ Complete	
		□ Pass □ Fail	□ NotNeeded□ Pass □ Fail	□ NotNeeded□ Complete	
		□ Pass □ Fail	□ NotNeeded□ Pass □ Fail	□ NotNeeded□ Complete	