

PROMOTING RRP THROUGH PERMITTING

**Connecticut Department of Public Health
Lead & Healthy Homes Program**

**Lisa Bushnell
Fall Semi-Annual Meeting
September 12, 2014**

What Is the Lead-Based Paint Renovation, Repair and Painting Program (RRP)?

- RRP is a federal regulatory program affecting contractors, property managers, and others who disturb painted surfaces
- It applies to residential houses, apartments, and child-occupied facilities such as schools and day-care centers built before 1978
- It includes pre-renovation education requirements (406b PRE) as well as training, certification, and work practice requirements

What Activities are Subject to RRP?

Remodeling and repair/maintenance, electrical work, plumbing, carpentry, etc., (for payment) that disturbs:

- > 6 square feet of interior painted surfaces (per room) during projects on housing and child occupied facilities built pre-1978
- > 20 square feet of painted exterior surfaces during projects on housing and child occupied facilities built pre-1978
- Any window replacement

Who Must Follow the RRP Rule Requirements?

Anyone who receives compensation for performing work on a pre-1978 dwelling and/or child occupied facility.

Examples:

- | | |
|---|--|
| <ul style="list-style-type: none">• Residential rental property owners• Painters• Home Improvement Contractors• Renovators & Remodelers• Carpenters• School Administrators | <ul style="list-style-type: none">• Daycare Owners/Operators• Finishing Workers• Property Managers• Maintenance Staff• Electricians & Plumbers• Window Replacement Firms• And Many Others..... |
|---|--|

The intention of the RRP Rule is to:

- To prevent exposure to lead during renovation, repair, painting, & remodeling
- To educate consumers on the risks of lead dust
- To ensure that contractors have the necessary training and credentials

Since implementation of the RRP Rule CT DPH has provided:

- **Compliance assistance** – typically conducted as part of a complaint response/investigation
- **Education/outreach** – variety of audiences including contractors, property managers, tenants, daycares
- **Awareness training** – for building officials, housing authorities, professional organizations

Next steps: Increase Compliance & Participation through Permitting

In April 2014 Circular Letter 2014-15 was sent to DOHs & Chief Sanitarians.

This CL requested that LHDs coordinate with building & permitting officials to ask that contractors performing work on pre-1978 properties fill out an:

RRP Intake Form for Permits

RRP Intake Form for Permits For Pre-1978 Residential Projects



Town: _____

Permit #: _____

What is RRP?

RRP is the Federal EPA's Renovation, Repair, and Paint Program. This law requires contractors that disturb painted surfaces in homes, child care facilities, and schools built before 1978 to be certified by EPA and follow specific work practices to prevent lead contamination. Individuals employed by the firm must be trained and certified. The contractor must give property owners and residents a copy of "Renovate Right", a pamphlet describing the lead-poisoning risks that may come from renovation activity in homes built before 1978. The following information is necessary to assist EPA Region 1 and the State of CT in its efforts to eliminate lead poisoning in children and adults. This checklist is not applicable for Lead Abatement or homeowner "Do-It-Yourself" projects. The contractor must provide the following information prior to obtaining a local construction or renovation permit:

Business name: _____

Business address: _____

CT HIC #: _____

EPA RRP Lead-Safe Certified Firm #: _____

EPA RRP Renovator training certificate #(s): _____

Property address: _____

Statewide efforts...

To date we have received responses from **6** LHDs

- 5** have provided reasons why they didn't receive support from their building department
- 1** agreed to use the Intake Form

National efforts...

- Minnesota has passed a law requiring municipalities to verify lead certification qualifications
- The City of Chicago amended their municipal code requiring contractors to submit a sworn statement the workers have been trained in accordance with 40 CFR Part



**THIS
INITIATIVE
IS A
PRIMARY
PREVENTION
ACTIVITY!**

Materials to Support LHDs Promotion of the RRP Rule :

Enclosed in CL 2014-15 were:

- An EPA Enforcement Alert that can serve as a Fact Sheet
- A map with rates of lead poisoning
- An a graphic with lead hazards by source.

Next Steps:

**L&HHP requests that LHDs
continue to reach out &
collaborate with their building &
permitting officials**

Next Steps:

**Document your efforts
on the following form and
send the form to the
L&HHP**

Preventing Lead Poisoning from Renovation & Remodeling Activities
Feedback Form on Efforts to Include RRP Form during Permit Approvals

The Director of Health should complete this form after meeting with his or her local building official. Your feedback is needed, so that the CT DPH can understand and address identified barriers to implementing this proposal.

1. Does your local building official's office support implementation of the *RRP Intake Form*?
 Yes, the building official is supportive of this effort
 No. (If no, then please explain reason for lack of support below.)

2. Date of meeting with building official(s): _____

3. People in attendance:

_____	_____	_____
_____	_____	_____
_____	_____	_____

(Name) (Title) (tel # or email)

4. Outcome of Meeting:

Yes, we will use this *RRP Intake Form* for per-1978 residential projects where permits are required
 No, we cannot use this form. (If no, please explain below.)

Barriers or boundaries to successful implementation (please be specific and detailed):

Why?

The forms will provide us info on the barriers and successes of your efforts, these can be shared with our local, state, and federal partners.

Key Points to Remember

- This is a Primary Prevention Effort
- RRP is a Federal Regulation
- Compliance with the RRP Rule **WILL** reduce children's exposure to lead hazards

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