

Lead Renovation, Repair, and Painting Rule

As of 22 April, 2010 any firm working in a pre-1978 structure that falls under the target-housing was required to abide by the terms of the EPA's Lead Renovation, Repair, and Painting Rule (LRRP). North Carolina has created its own rule and enforcement division to administer this new policy. The "target-housing" is defined as any structure built 31 December, 1977 or before that is used as a residence or is child-occupied, meaning a child visits the structure more than twice a week for 3+ hours each visit (ex: schools, daycares, etc.).

The Opt-Out clause in the original rule has since been removed. This means that home and building owners are not allowed to drop the requirements for a contractor working in their structure as long as it fits the target-housing criteria. Even if no children are ever present in the building, if it is a residence built prior to 1978 the work must be conducted in a lead-safe manner.

The lead-safe work requirements use a lot of common sense in their application, and it will be interesting to see how the rule is enforced. The basic principles are below:

- All firms working in target housing must be certified through the NC Department of Health and Human Services Division of Public Health, Health Hazards Control Unit
- All firms must employ at least 1 Certified Renovator who has attended accredited courses

Upon selecting a firm to complete work on the structure the following sequence begins:

1. Determine square footage of painted area to be disturbed. If less than 6 square feet of interior surface or 20 square feet of exterior surface the work will not require the use of lead-safe practices.
2. If the affected area qualifies, testing can be done to prove there is no lead present. This testing must be done by a Certified Renovator. Each architectural element being disturbed must be tested. This means if 1 window or door tests lead-free, it does not mean the entire project can be deemed lead-free. The time and expense necessary to test, and the likelihood of lead being present in most historic structures (certainly those dating from the 1960s and before), means that it is typically more feasible to conduct all demolition and paint disturbing work on period structures in a lead-safe manner.
3. Assuming lead is present, work will commence in a lead-safe way. The best resource to understand these methods can be found at:
<http://www.epa.gov/lead/pubs/renovaterightbrochure.pdf>
4. Any certified contractor must present the above referenced brochure and have the owners sign an acceptance sheet.

5. The general demolition and “paint disturbing” work must be conducted using respirators and protective suits for all workers. Barriers must be installed (plastic and tape) to prevent dust and debris from spreading through a structure.
6. All materials being removed from the premises must be sealed in heavy-duty garbage bags. All dust must be cleaned up daily with a HEPA vacuum.
7. Following all “paint disturbing” work, tests must be conducted by a Certified Renovator to ensure no lead dust is present. Records and pictures of the tests must be retained by the firm.

Most homeowner’s biggest question is- What is the cost associated with lead-safe work? The additional materials and time necessary, plus overhead associated with recordkeeping; certainly add to the overall job cost. Depending on the size of the project, these can run between 5 and 20 percent. However, the EPA and State have made it impossible for historical restoration contractors to avoid these costs. The negative impact of lead exposure, especially to children and unborn babies, is not to be taken lightly, and the costs far outweigh the potential side effects. Make sure that any contractor working in your home or other “target” structure is certified and conducts all work in a lead safe manner. Do not hesitate to call with any questions you may have regarding the LRRP and lead-safe work.

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