

NEW ENGLAND'S  
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2010  
Questions asked during  
EPA RRP Class

## Renovator Repair and Painting (RRP) Questions

### Certification

- 1) Can I just have a copy of the certificate on the job site or do I have to have the original there? The slides/overheads say a copy of the Firm Certification and the Renovator Certification, but the standard (under 745.90 (b) (7)) states copies of their initial certificate and most recent refresher certificate.
  - a) IEE Answer: The regulation requires a copy of the Certified Renovators initial certificate and most recent refresher certificate.
  - b) EPA Answer: Correct
- 2) When a General Contractor (who is a Certified Firm) subcontracts work, do the subcontractors to have to be a Certified Firm or can the Subs fall under the General Contractors certification as a Firm?
  - a) EPA Answer: The subcontractors must be certified firms.
- 3) Does question # 1 change if the General Contractor pays Workers Compensation insurance for the Subcontractors?
  - a) EPA Answer: The firm to which the contractor is employed must be a certified firm.
- 4) Must an owner of a single family rental property become a Certified Firm when the owner is performing renovation work?
  - a) EPA Answer: Yes the owner must be certified. The exemption only applies to an owner doing work in the home in which he/she resides.
- 5) In the Certified Firm Application the question: "Does the firm hold current permits, licenses, certifications, or registrations in the lead-based No paint field in any state, U.S. territory, or Indian tribal land?" is asking what?
  - a) IEE Answer: If the firm is certified or licensed in the lead field, then select "YES" and list that license in this section. Otherwise, select "NO"

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### Cleaning Verification

- 1) Can the Certified Renovator use the same wipe multiple times when wiping window sills. i.e. if a wipe on a window sill passes the Verification Card, can they fold the wipe, and use another area for the next window sill?
  - a) EPA Answer: the regulation states “If the cloth does not match...then either use a new cloth or fold the used cloth in such a way that an unused surface is exposed, and wipe the surface again.”
- 2) Can pre-moistened wipes include Baby wipes?
  - a) EPA Answer: No – Since many baby wipes contain a skin softening agent such as Lanolin or Vaseline in them. However, other cloths can be used if they are pre-moistened and designed for cleaning counter tops and floors. Wet disposable cleaning cloth means a commercially available, pre-moistened white disposable cloth designed to be used for cleaning hard surfaces such as uncarpeted floors or counter tops.
- 3) If the cleaning verification wipes fail two times, can a tack-cloth be used for the dry cleaning?
  - a) EPA Answer: No, a tack cloth is not electro statically charged. Dry disposable cleaning cloth means a commercially available dry, electro statically charged, white disposable cloth designed to be used for cleaning hard surfaces such as uncarpeted floors or counter tops.
- 4) During renovation work in a non-carpeted room, furniture is left in the work area and covered with plastic. Must the entire floor be wiped in the work area? Specifically, must the furniture be moved to wipe underneath that area?
  - a) EPA Answer: Yes the furniture would need to be moved to allow all floors within the work area to be wiped.
- 5) If I use a mini-containment (i.e. Zipwall system), can I limit my cleanup and cleaning verification to within the mini-containment (plus clean two feet outside the mini-containment)?
  - i) Example 1: Mini-containment around a window being replaced in a room
  - ii) Example 2: Mini-contain in Kitchen by placing plastic sheeting from ceiling to floor (over cabinets and counter top space to separate from the work area.
  - a) EPA Answer: Yes
- 6) Can Renovators hire a Lead Inspector for dust sampling?
  - a) EPA Answer: Yes, post renovation dust sampling can be done either an EPA certified inspector, risk assessor, or dust sampling technician.

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## Waste Disposal

- 1) Waste must be contained to prevent release of dust and debris before the waste is removed from the work area for storage or disposal.
  - i) Does “contained” mean bagged or wrapped in plastic (when referring to windows and doors, etc)? Student comment: “Plastic wrapped components with nails sticking out does not work very well.
  - ii) Can you use a covered chute to put doors/windows (not wrapped in plastic) into a dumpster.

a) EPA Answer: i) The waste containment (bag/plastic wrap) must be sufficient to prevent releases of dust and debris. ii) No, waste must be contained before being removed from the work area.
- 2) A question that has been raised in every renovator course to date is: For the purposes of lead renovation debris disposal, does the EPA allow owners of more than 4 units still dispose of the renovation debris as construction debris?
  - a) EPA Answer: The federal position is that it would be considered residential and able to be disposed with regular trash, however, these requirements can vary by state, so they should check with the state to be sure.

## Training

- 1) There will occasionally be students who arrive late for the class. Your response indicates that they will not be allowed to make up any amount of time in a later course. However, if they arrive late, when must they be turned away? At what point, (i.e. 10 minutes, 20 minutes, 30 minutes, 1 hour) should they not be allowed to take the course?
  - a) EPA Answer: They have to make up the course the same day as it was to be offered. The only time you would have to make the instructor proctored time is time is during lunch. So if lunch is 45minutes - they cannot miss more than 45 minutes.
- 2) Is there a refresher requirement for the Workers who are training by the Certified Renovator?
  - a) EPA Answer: No
- 3) Is there a grace period where the Certified Renovator can attend a refresher course after their certificate expire, without taking the initial course over?
  - a) EPA Answer: Once their certificate expires they can't conduct regulated activities. Once trained, they can always take the 4-hour refresher to be recertified, even after their certification expires.

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- 4) Can a certified renovator (who is bi-lingual) train workers whose English isn't very good without translating the Lead-Safe Renovation, Repair and Painting booklet?
  - a) **EPA Answer: A renovator is not required to use the booklet to train workers on the job. FYI, there are Spanish translations of most of our materials on the website ([www.epa.gov/lead](http://www.epa.gov/lead)).**
- 5) Can a certified renovator train such workers with the help of a translator?
  - a) **EPA Answer: This may be OK for the training, but the problem is how does the renovator communicate with those workers during the course of the work. The renovator is responsible for overall compliance and would need to be able to communicate with workers in order to accomplish this.**
- 6) Can a principal instructor, train workers or can the training only be done by the certified renovator?
  - a) **EPA Answer: No, only a certified renovator.**

### Work Practices

- 1) Is pressure washing on the exterior of a building considered abrasive blasting by EPA and if not is it allowed?
  - a) **EPA Answer: No, it's not. Pressure washing is allowed.**
- 2) Which signs can be used on-site?
  - a) **EPA Answer: Typically a renovation work site will require OSHA signage. The RRP standard says that if such a sign is used that additional signage is not required.**
- 3) The list of approved test kits is available at <http://www.epa.gov/lead/pubs/kits.htm>

### State Questions: Massachusetts

- 1) Is replacing windows in a residence with a child under 6 considered renovation or Deleading/abatement?
  - a) **IEE Answer: In Massachusetts, it could be considered both depending on the situation. If the intent is to achieve compliance with the Massachusetts Lead Law, in whole or in part, then the work is considered Deleading/abatement. Otherwise the work could be considered renovation. IEE suggests owners and/or renovators contact CLPPP for specific situations to determine if work is Deleading or Renovation.**
- 2) If a property has a Massachusetts compliance letter, is the work renovation or Deleading work.?
  - a) **IEE Answer: Refer to CLP Policy 10 A and 10 B on Maintaining Compliance. The work would normally be renovation. However, it is possible that Deleading rules would apply.**

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### State Questions: Rhode Island

- 1) Can people who take our RRP Course in Massachusetts become certified as a Renovator in Rhode Island (as of today)
  - a) No, not yet. We have plans to create a remodeler/renovator state exam that would demonstrate those licensed in other EPA approved states have sufficient knowledge of RI regulations to obtain a license to conduct lead hazard control activities in accordance with our regulations.
- 2) Can people who take our RRP Course in Massachusetts become certified as a Renovator in Rhode Island (Once RI is an Authorized State)
  - a) Yes, they can take the state exam.
- 3) If yes to the above, Do we need RI training license to run courses in RI?
  - a) Yes, all training providers need a RI license.
- 4) Regardless of above

Will RI allow Certified Renovators to use EPA approved test kits

  - a) No- RI regs require laboratory analysis to determine lead free status of paint (the RI standard for lead free paint is < 150 ppm). All field tests performed on pre 1978 painted surfaces must be assumed positive for lead if the test (XRF or sodium rhodizonate) is inconclusive (aka negative in EPA rules). Field tests can only determine the presence not the absence of lead based paint according to RI lead regulations.
- 5) Will RI allow Certified Renovator to performing cleaning verification
  - a) No- require dust wipe testing and laboratory analysis to make the determination that no lead dust hazard is present.
- 6) Will RI license/certify Lead Sampling Technicians
  - a) No- we only allow licensed RI Environmental Lead Inspectors (requires 40 hour training and extensive apprenticeship) or licensed RI Environmental Lead Inspector Technicians (requires 24 hour training and less extensive apprenticeship) to conduct sampling.
- 7) Any other differences with EPA protocols?
  - a) There are other differences such as ...RI will not allow an owner "opt out" under any circumstances; direct on site supervision by a licensed remodeler/renovator is required during all lead hazard control activities; we require the submission of a Lead Hazard Control Start Work Notification to our office at least 3 days prior to work beginning. We are planning a Public Hearing on our proposed amendments to the RI Rules and Regulations For Lead Poisoning Prevention [R23-24.6-PB] in mid January. In case I missed listing any of the differences, once we announce the hearing, the propose amended regulations will be available for viewing on the Department of Health website and the RI Secretary of State website.