

RIDOH RRP RULE

Renovation, Repair, and Painting (RRP) Summary

Applicability

Window removal/replacement (no de minimis).

Any work that disturbs paint for reasons other than removing lead or correcting lead hazards at a regulated facility or for compensation at target housing.

Funding agency requires RRP (e.g. home improvement loan lender).

Owner requests RRP.

Scope

Scope of work must be completed, and the work area(s) cleaned.

RRP Licenses/Certifications

Owner/principal or employee of the Lead Renovation Firm must complete the Lead Renovator training.

Certified Lead Renovator must be on site during all RRP activities.

Pre-Renovation Education (PRE)

Renovate Right must be distributed to owner and occupants at least 7 days but no more than 60 days in advance of beginning the work.

Written proof must be kept for at least 3 years after the work is completed.

Start Work Notification (SWN)

Required for window replacement, interior or partial demolition, interior mechanical paint removal, or if a variance was granted for the RRP project.

Must be received by RIDOH at least 7 days in advance of beginning the work.

If project does not begin or end within 7 days of the start or end dates on the SWN, a revised or canceled SWN is required.

If project is done in phases, a new SWN must be submitted for each phase.

If project is canceled, a canceled SWN is required.

Occupant Protection

Occupants may not be in or re-occupy work area(s) until dust wipe clearance (optional) or Cleaning Verification, as a minimum, is achieved.

Warning Signs

Must contain at least the text required by 29 CFR 1926.62(m):

Warning:

Lead Work Area

May Damage Fertility or the Unborn Child

Causes Damage to the Central Nervous System

Do Not Eat, Drink, or Smoke in this Area

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Sign Must Contain a 24-hour emergency number (not 911).

To the extent practicable, sign must be in the primary language of the occupants.

Sign must be readily visible and securely affixed in such a way that prevents their loss or unintentional removal.

Sign must remain in place and readable until clearance is achieved.

Approved Paint Testing Methods

Testing Method	Lead Inspector	Lead Assessor	Lead Renovator
Lead Test Kit	X	X	X
Paint Chip Sampling for Laboratory Analysis	X	X	X
XRF Analyzer	X		

A Lead Renovator, who performs lead testing for the purpose of determining the applicability of the RRP Rule, must test every component affected by the renovation. The Lead Renovator must complete a Test Kit Documentation Form or Paint Chip Sample Collection Form and chain of custody. A signed copy must be provided to the property owner within 7 days and retained for at least 3 years from completion of the project.

Environmental Lead Standards

Testing Method	Lead Safe	Conditionally Lead Safe	Lead Hazard
Lead Test Kit	No reaction when all layers of paint are exposed, and test kit is used in accordance with manufacturer's instructions	Not Applicable	Positive Reaction (pink or red)
Paint Chip	< 5,000 ppm or < 1.0 mg/cm ²	Intact Paint ≥ 5,000 ppm or ≥ 1.0 mg/cm ²	Damaged Paint ≥ 5,000 ppm or ≥ 1.0 mg/cm ²
XRF	< 1.0 mg/cm ²	≥ 1.0 mg/cm ²	≥ 1.0 mg/cm ²

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Prohibited Work Practices

Dry hand scraping, except for within one foot of electrical outlets;
Dry hand sanding, except for “feathering” of previously treated interior painted surfaces;
Using a heat gun or other heated device, which chars paint, or at surface temperatures at or above 1100° F;
Open flame burning or torching;
Using paint strippers which are flammable or contain methylene chloride;
Using mechanical paint removal equipment not controlled by a HEPA vacuum system, and/or with a sanding or scraping disk wider than the direct surface upon which it is being used;
Using dry abrasive blasting equipment not controlled by a HEPA vacuum system;
Hydro blasting, including but not limited to, using wet abrasive blasting equipment, and pressure or power washing;
Any other interior methods not approved by the Department;
Any other exterior methods not approved by DEM Office of Air Resources; and/or
Any treatment in violation of local municipal building codes.

Approved Work Practices

Wet hand scraping or sanding;
“Feathering” of previously treated interior painted surfaces;
Using heat guns that do not char paint or exceed 1100° F;
Paint stripping in adequately ventilated areas using non-flammable chemical strippers that do not contain methylene chloride;
Using shrouded mechanical paint removal equipment controlled by a HEPA vacuum system, provided that any and all spent abrasive, paint, particulate, dust, and/or other debris generated by the operations is immediately collected by the system, and provided that no sanding or scraping disk is wider than the direct surface upon which it is being used;
Using dry abrasive blasting equipment controlled by a HEPA vacuum system, provided that any and all spent abrasive, paint, particulate, dust, and/or other debris generated by the operations is immediately collected by the system, or a vacuum blast system used in accordance with the manufacturer’s guidelines (variance required for interior blasting);
Any other interior methods approved in writing by the Department; or
Any other exterior methods approved in writing by DEM Office of Air Resources.

Cleaning

Cleaning must include the contained work area and 2 feet beyond containment.
Final cleaning must begin no sooner than 1 hour after preliminary cleaning was completed.

Cleaning Verification

Critical barriers may be removed after successful cleaning verification.
As a minimum, the Cleaning Verification Procedure must meet the EPA Standards in 40 CFR Part 745 and be documented on the Renovation Recordkeeping Checklist.

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Clearance Inspection

Dust wipe clearance may be performed instead of the Cleaning Verification Procedure. Under 216-RICR-50-15-3, dust wipe clearance by a Lead Inspector is optional for work that was not performed for the purpose of removing lead or correcting lead hazards but may be required by HUD or to obtain a Certificate of Lead Conformance.

Dust wipe clearance must be performed by a licensed Lead Inspector who is independent of the firm doing the renovation work.

If performed, dust wipe sampling must begin no sooner than 1 hour after final cleaning was completed.

A Partial Lead Safe Certificates (PBLSC-27) may be issued when optional dust wipe clearance is achieved to document the area(s) are safe for re-occupancy.

If dust wipe clearance fails, the Lead Renovator must re-clean the entire clearance area before the dust wipe sampling is repeated; cleaning verification is no longer an option.

Renovation Recordkeeping Checklist

The Lead Renovator must complete and sign a Renovation Recordkeeping Checklist and provide a copy to the owner within 7 days. A copy must also be provided to RIDOH upon request.

A Sample Renovation Recordkeeping Checklist is available in the EPA/HUD Model Certified Renovator Training Course Manual or at www.epa.gov.

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Definitions

“Demolition” means, for the purposes of this Part, the removal of any structural member, architectural component, or fixture by destruction, as distinguished from removing the component whole or piece by piece.

“Minor Repair and Maintenance” means activities including minor heating, ventilation, and air conditioning (HVAC) work, electrical work, or plumbing work that disturbs less than six square feet (6 ft²) of lead-based paint per room for interior activities or less than twenty square feet (20 ft²) of LBP for exterior activities where none of the work practices prohibited or restricted by 216-RICR-50-15-3 are used and where the work does not involve window replacement or demolition of painted surfaces. For the purposes of these Regulations, the term minor repair and maintenance shall be synonymous with spot removal.

“Renovation” means the modification of any existing structure, or portion thereof, that results in the disturbance of lead-based paint, unless that activity is performed as part of a lead hazard control or lead hazard reduction project. The removal, modification, or repair of painted surfaces (e.g., modification of painted doors, surface restoration, window repair); surface preparation activities such as sanding, scraping, or other such activities that may generate paint dust; the removal of building components (e.g., walls, ceilings, plumbing, windows); weatherization projects (e.g., cutting holes in painted surfaces to install blown-in insulation or to gain access to attics, planning thresholds to install weather-stripping); interim controls that disturb lead-based paint; and modifications performed for the purpose of converting a building, or part of a building, into target housing or child care facilities. The term renovation does not include minor repair and maintenance activities or spot removal, provided that no prohibited work practices are used.

“Spot Removal or De Minimis” means minor repair and maintenance activities, which do not involve window replacement or demolition of painted surface areas, disturb less than six square feet (6 ft²) of interior lead-based paint per room or less than 20 square feet (20 ft²) of exterior LBP, and provided that no prohibited work practices are used. When removing painted components, or portions of painted components the entire surface area removed is the amount of lead-based paint being disturbed. Any work which disturbs lead-based paint, other than emergency renovation operations, performed in the same room or area within the same 30-day period must be considered the same project for determining whether the work is spot removal or renovation, repair, and painting (RRP).