

To: [AGENCY] Lead Contractors

From:

RE: EPA RRP Compliance: Safe Work Practices & Worker Protections
Renovation, Repair, and Painting Rule (40 CFR Part 745 Subpart E)

Purpose

This document outlines the mandatory safety procedures and worker protections required under the Environmental Protection Agency's (EPA) **Renovation, Repair and Painting (RRP) Rule**. The goal is to minimize **lead-based paint hazards** during work that disturbs painted surfaces in **pre-1978 buildings**.

The RRP Rule applies to all non-abatement lead work given to lead contractors providing lead renovation for Isles. Abatement contractors must follow additional rules as outlined in HUD, EPA and NJ Lead Abatement Code.

The key areas for focus are:

- Containment
- Cleaning
- Worker Protection

Contractors **MUST** follow all lead safety procedures as outlined in this document and in HUD Guidelines.

Key Compliance Requirements

1. Certified Renovators and Firms

- All firms must be **EPA-certified** to perform RRP work.
- Each job site must have a **Certified Renovator**, trained through an EPA-approved program. (RRP initial training or RRP Refreshers can be provided free of charge to your workers by Isles.)

2. Lead Safe Work Practices

All contractors and their workers must comply with ALL lead safe work practice for every job. *This includes temporarily unoccupied units.*

A. Work Area Containment

- Use **plastic sheeting** (minimum 6 mil) to isolate the work area:
 - Cover floors at least 6 feet from work surfaces.
 - Seal doors, windows, HVAC vents.
 - Contain areas without doors using Zip Wall or equivalent.
 - Post warning signs (“Do Not Enter — Lead Work Area”).
 - If job requires multiple days and work areas must be "staged" each day, **Contractors must clean work areas to "cleaning verification" standard** before moving to next work areas. Final clean to clearance must be done prior to job completion.

B. Minimize Dust

- Prohibited practices:
 - No **open flame burning or torching**.
 - No **machine sanding or grinding** without HEPA vacuum attachments.
 - No **dry scraping** except in very limited areas (under 1 square foot).
- Use **wet methods** (wet sanding/scraping) to control dust.

C. Cleaning Protocols

- Conduct **thorough cleaning** after renovation:
 - Use **HEPA vacuums** on all surfaces.
 - Wet-wash walls and sills with disposable wipes or rags.
 - Use 3 bucket mopping or Swiffer for floors. Use Simple Green (or D-Lead for difficult wood surfaces). Do not use cleaning products with TSP.
 - Surfaces must pass **EPA/NJ Lead Clearance Standards** for jobs to be complete.
 - After 2 clearance failures all subsequent clearances cost will be the responsibility of contractor. Please ask for help with cleaning procedures if you are unsure of the proper methods. Repeated, multiple failures may result in suspension of contract.
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Worker Protections

1. Personal Protective Equipment (PPE)

- At a minimum, workers must use:
 - **Disposable coveralls or clothing** to prevent contamination.
 - **Gloves and protective eyewear**.
 - **N-100 or P-100 respirators** when disturbing lead paint (especially in enclosed or dusty environments).

2. Hygiene & Decontamination

- No eating, drinking, or smoking in work area.
 - Workers should:
 - Change out of contaminated clothing before leaving site.
 - Wash hands and face thoroughly before eating or breaks.
 - Dispose of or clean PPE daily.
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Waste Handling

- All waste (plastic sheeting, dust/debris, wipes) must be **sealed in heavy-duty plastic bags** and labeled.
- Waste should be removed carefully to **minimize release of dust**.
- Transport and dispose of according to **local and state regulations**.

Review and Acceptance

I, the undersigned, have review the RRP Protocols and accept all of the provisions in them. I agree that all lead jobs provided by my company will comply with these standards and that my workers will be made aware of the requirements for proper lead safety.

I understand that Isles' Lead Construction Managers will monitor my compliance and that repeated violations may results in the suspension of my contract.

Contractor Name	Date
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Contractor Signature	Date
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