

ENHANCED CHECKLIST FOR RENOVATIONS REGULATED BY THE RRP RULE
USEPA – Region II
Regional Hearing Clerk

I PURPOSE

To facilitate the documentation of compliance with the U.S. Environmental Protection Agency’s Lead Renovation, Repair, and Painting (RRP) Rule 40 C.F.R. Part 745, Subpart E, or any applicable U.S. EPA-Authorized State or Tribal program regulating lead-based paint safe work practices. Not all aspects of compliance with the Rule can be fully captured with a checklist and additional logs, records and photos may need to be kept. In addition, any discrepancy between the requirements in this document and the RRP Rule, the RRP Rule prevails.

II GENERAL PROJECT INFORMATION:

Property Address: _____

City State Zip

Property Owner: _____

Address: _____

City: _____ State: _____ Zip code: _____ Phone: () _____

Email: _____

Contractor/subcontractor firm name and RRP certification number (copy of the firm certificate must be kept in project file):

Firm Name	Certification Number	Expiration date
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Assigned EPA-certified Renovator name & certification number (copy of training certificate must be available on the work site and kept in project file):

Renovator Name	Certification Number	Expiration date
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Project Start Date: _____ Expected Completion Date: _____

Brief description of Renovation Project (include painted surfaces disturbed and estimated square footage of paint to be disturbed):

Contractor has reviewed scope of work and has secured sufficient supplies to perform all required activities covered in this checklist.

III LEAD TESTING INFORMATION [40 C.F.R. § 745.82(a)] Select A or B below:

- _____ A) Testing for lead was performed to exclude components from the RRP Rule. Check one of the following boxes and **attach documentation**.
- A written determination from an EPA-certified Inspector or Risk Assessor that the components affected by the renovation are free of paint or other surface coatings that contain lead equal to or in excess of 1.0 mg/cm² or 0.5% by weight.
 - The assigned certified Renovator, using an EPA-recognized test kit as defined in 40 C.F.R. §§ 745.83 and 745.88, and following the manufacturer's instructions, has tested each component affected by the renovation and determined that the components are free of paint or other surface coatings that contain lead equal to or in excess of 1.0 mg/cm² or 0.5% by weight.
- _____ B) **Testing was not performed.**

IV EMERGENCY RENOVATIONS [40 C.F.R. § 745.82(B)]

- _____ A) Renovation qualifies as an Emergency Renovation.
Describe emergency situation and continue to Section VI:

- _____ B) Renovation does not qualify as an Emergency Renovation.

V INFORMATION DISTRIBUTION REQUIREMENTS [40 C.F.R. § 745.84]

- _____ A) **Renovations in dwelling units.**
- The property owner was provided with the Renovate Right Pamphlet and (select one):
 - A written acknowledgment¹ of receipt was obtained and is kept in the project file.
 - A Pamphlet was delivered to the owner by certified mail at least seven (7) days prior to the start of the renovation, and the certificate of mailing is kept in the project file.
 - If the unit is **not owner-occupied**, Distribution to occupants was ALSO made by (select one):
 - An adult occupant was provided with the Renovate Right Pamphlet and a written acknowledgment of receipt was obtained and is kept in the project file.
 - A Pamphlet was delivered to the unit by certified mail at least seven (7) days prior to the start of the renovation, and a written acknowledgment of receipt was obtained and is kept in the project file.
 - A Pamphlet was delivered to the unit by certified mail at least seven (7) days prior to the start of the renovation, but the firm performing the renovation was unsuccessful in obtaining a written receipt. A written certification that includes: the address of the unit, the date and method of delivery of the pamphlet (including

¹ The written acknowledgement must include a statement recording the owner or occupant's name and acknowledging receipt of the pamphlet prior to the start of renovation, the address of the unit undergoing renovation, and the signature of the owner or occupant and the date of signature. It must be written in the same language as the text of the contract or agreement for the renovation or, in the case of non-owner-occupied unit, the same language as the lease or rental agreement or the pamphlet.

certified mailing documentation), names of the person(s) delivering the pamphlet, reason for lack of acknowledgment, and signature of a firm representative with date of signature is kept in the project file.

- No regulated renovations in dwelling units.

_____ B) **Renovations in common areas.**

- The property owner was provided with the Renovate Right Pamphlet and (select one)
- A written acknowledgment of receipt was obtained and is kept in the project file.
 - A Pamphlet was delivered to the owner by certified mail at least seven (7) days prior to the start of the renovation, and the certificate of mailing is kept in the project file.

And one of the following:

- A written notice was distributed to each affected unit describing the general nature and locations of the planned renovation activities including expected start and end dates, information on how occupants can obtain the Pamphlet and a copy of the final records required by 745.86(c) and (d) at no cost. A copy of the written notice is kept in the file.
 - Informational signs were posted at all times during the renovation describing the project, renovation locations, and the anticipated end date. Signs are posted in areas where they are likely to be seen by the occupants of all affected units and are accompanied by a posted copy of the Pamphlet or information on how interested occupants can review or obtain a copy. Information on how occupants can review or obtain a free copy of the records required by 745.86 (c) and (d) are also included.
- No regulated renovations in common areas.

_____ C) **Renovations are in Child-Occupied Facilities (COF).**

- The property owner was provided with the Renovate Right Pamphlet and either a written acknowledgment of receipt was obtained and is kept in the project file or a certificate of mailing at least seven (7) days prior to the start of the renovation is kept in the project file.
- If the COF is not the owner of the building, an adult representative of the COF was provided with the Pamphlet and (select one of the following)
- A written acknowledgment² of receipt was obtained and is kept in the project file.
 - A written certification statement that the Pamphlet was delivered to the facility that includes the address of the COF, date and method of delivery of the Pamphlet, names of the persons delivering the Pamphlet, reason for the lack of acknowledgment, if any, the signature of a representative of the renovation firm, and date of said signature. A copy of the written notice is kept in the file.
- Parents and guardians of children using the COF have been provided with the Pamphlet, information describing the renovation, and information on how to review a copy of the records required by 745.86(c) and (d) by (select one of the following):
- Mailing or hand delivering the Pamphlet and renovation information to each parent or guardian of a child using the COF.
 - Posting signs during the renovation that describe the renovation, including locations and anticipated completion dates, in areas where they can be seen, along with a

² The written acknowledgement must include a statement recording the owner or occupant's name and acknowledging receipt of the pamphlet prior to the start of renovation, the address of the unit undergoing renovation, and the signature of the owner or occupant and the date of signature. It must be written in the same language as the text of the contract or agreement for the renovation or, in the case of non-owner-occupied unit, the same language as the lease or rental agreement or the pamphlet.

posted copy of the Pamphlet or how interested parties can review or obtain a copy. Information on how occupants can review a copy at no cost of the records required by 745.86 (c) and (d) are also included.

- No COF undergoing regulated renovations.

VI WORK PRACTICE STANDARDS [40 C.F.R. § 745.85]

- _____ A) **Occupant Protection** – Signs have been posted clearly defining the work area and warning occupants and other persons not involved in renovation activities to remain outside of the work area.
- Primary language of occupants is not English, signs posted in _____ language.
- _____ B) **Containing the Work Area** – Before beginning the renovation, the work area has been isolated so that no dust or debris leaves the area while the renovation is ongoing.
- _____ C) **Integrity of containment** is maintained throughout the renovation.
- _____ D) **Interior Renovations:**
- All objects in the work area are removed or covered.
- HVAC ducts in the work area are closed and covered.
- Windows in the work area are closed.
- Doors in the work area are closed and sealed. Doors that must be used in the work area are covered to allow passage but prevent spread of dust.
- Floors in the work area are covered with taped-down plastic sheeting or other impermeable material 6 feet beyond the perimeter of surfaces undergoing renovation.
- All personnel, tools, and other items, including exteriors of waste containers are free of dust and debris before leaving the work area.
- _____ E) **Exterior Renovations**
- Windows in and within 20 feet of the work area are closed.
- Doors in and within 20 feet of the work area are closed and sealed.
- Ground is covered by plastic extending 10 feet from work area.
- Vertical containment is installed when property line prevents 10 feet of ground covering or when necessary to prevent migration of dust and debris to adjacent property.

VII RESTRICTED PRACTICES³ USED CORRECTLY [40 C.F.R. § 745.85(a)(3)]

- _____ A) Machines designed to remove paint or other surface coatings through high-speed operations such as sanding, grinding, power planing, needle gun, abrasive blasting, or sandblasting **have shrouds or containment systems and are equipped with a HEPA vacuum attachment to collect dust and debris at the point of generation.** These machines are operated so that no visible dust or release of air occurs outside the shroud or containment system.
- _____ B) A heat gun operating at temperatures **below 1,100 degrees Fahrenheit** is being used.

VIII RENOVATION WASTE [40 C.F.R. § 745.85(a)(4)]

- Waste is contained on-site before removal from the work area, during removal from the work area and while being transported off-site.
- A chute is used, and the chute is covered.
- Waste that is collected from renovation activities at the end of each workday is stored under containment, in an enclosure, or behind a barrier that prevents release of and access to dust and debris.

³ Restricted practices include the use of high-speed operation machines and heat guns.

- Waste transported from renovation activities is contained to prevent release of dust and debris.

IX WORK AREA CLEANING [40 C.F.R. § 745.85(a)(5)]

- All paint chips and debris are picked up and sealed in heavy-duty bags.
- Protective sheeting is misted and folded, dirty side inward, sealed, and disposed as waste.
- All objects and surfaces in interior work areas and within 2 feet of the work areas are cleaned from higher to lower in the following manner:
 - Walls: start at the ceiling and work down to the floor by either vacuuming with a HEPA filter or wiping with a damp cloth.
 - All remaining surfaces and objects in the work area were thoroughly vacuumed, including furniture and fixtures, with a HEPA vacuum, and - except for carpet and upholstered surfaces- wiped with a damp cloth.
 - Floors were mopped using a wet-mopping system or 2-bucket mopping method.

X POST-RENOVATION CLEANING VERIFICATION [40 C.F.R. § 745.85(b)]

- Interior Renovations:
 - The assigned certified Renovator performed a visual inspection until no dust, debris or residue is present.
 - The assigned certified Renovator wiped windowsills, uncarpeted floors, and countertops within the work area with a wet disposable cleaning cloth using the procedures outlined in 40 C.F.R. 745.85(b).
- Exterior Renovations:
 - The assigned certified Renovator performed a visual inspection until no dust, debris or residue is present.
 - Dust clearance testing [40 C.F.R. § 745.85(c)] was performed in lieu of post renovation cleaning by an EPA-certified inspector, risk assessor, or dust sampling technician and was done in accordance with 745.85(c). A copy of the report is attached.

XI Actual Project Completion Date: _____

XII Required Records [40 C.F.R § 745.86] kept with project file for a period of three (3) years:

- Determinations that lead-based paint was not present on affected components.
- Notification records including acknowledgments of Pamphlet receipt.
- Documentation of compliance with the work practice requirements of 40 C.F.R. § 745.85.
- Documentation that the assigned certified Renovator was assigned, and the following responsibilities were met:
 - The assigned certified Renovator provided training to workers on the work practice requirements of § 745.85. [745.90(b)(2)] *See separate training records for each worker trained.*
 - The assigned certified Renovator was physically present when signs were posted, work area containment was established, and while the work area cleaning was performed.
 - The assigned certified Renovator regularly directed work performed by other workers, maintained containment integrity, and was available, either on-site or by phone, at all times during the renovation.
 - The assigned certified Renovator performed the post-renovation cleaning verification as described in 40 C.F.R. § 745.85(b).
 - The assigned certified Renovator prepared the records required by § 745.86(b)(1)(ii)

and (6).

_____ **A copy of this completed checklist was provided to the owner of the building, and if different, the adult occupant, in accordance with 40 C.F.R. § 745.86(c)(2).**

Completed by:

Company Name

Name (printed)

Title

Signature