



STATE OF CONNECTICUT

DEPARTMENT OF PUBLIC HEALTH
REGULATORY SERVICES BRANCH
Environmental Health Section
Lead Poisoning Prevention and Control Program

EHS Circular # 2010-08

DATE: January 28, 2010

TO: Directors of Health and Chief Sanitarians
Department of Economic and Community Development (DECD)
Department of Labor (ConnOSHA)
Department of Public Works (DPW)
Department of Consumer Protection (DCP)
Office of Public Safety (OPS)
Department of Environmental Protection (DEP)
Department of Education (DOE)
CT Association of Directors of Health (CADH)
CT Environmental Health Association (CEHA)
CT Association of Housing Code Enforcement Officials (CAHCEO)
Lead Action for Medicaid Primary Prevention (LAMPP)

FROM: Mark Aschenbach, MS, RS, Environmental Analyst 3
Lead Poisoning Prevention and Control Program

RE: Environmental Protection Agency (EPA) Rules: *Lead Paint; Renovation, Repair and Painting Program (RRP) Rule, and 406b Pre-Renovation Education (PRE) Rule*

The Connecticut Department of Public Health, Lead Poisoning Prevention and Control Program (LPPCP) would like to make you aware of a new federal law issued by the EPA entitled, *Lead Paint; Renovation, Repair and Painting Program (RRP) Rule*. Additionally, we would like to make you aware of an existing federal disclosure rule that also impacts contractors; the 406b Pre-Renovation Education Rule (PRE).

Renovation work on pre-1978 housing such as window replacement, sanding, and demolition can create lead hazards, which can harm children and adults. To protect against this risk, the EPA is requiring that lead-safe work practices are followed when work is performed on pre-1978 housing and child-occupied facilities.

At this time, Connecticut is not an authorized state to administer and enforce the RRP Rule or the PRE Rule. The LPPCP does provide education/outreach, compliance assistance and awareness training on both federal laws.

Although the primary focus of the RRP rule is on home improvement contractors, specialty trades, and property management firms, other regulated entities (such as school administrators, housing



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agencies, and childcare providers) must be made aware of the rule and take the appropriate steps to comply. The LPPCP recommends that all regulated entities performing painting, renovation or rehabilitation work become EPA-certified to ensure compliance with the requirements of RRP.

We would appreciate your help in disseminating this information. Your cooperation is greatly appreciated and will assist us as we continue our efforts to eliminate lead poisoning in Connecticut.

To summarize the RRP Rule, please note the following:

- RRP is a federal regulatory program affecting contractors, property managers and others who disturb painted surfaces,
- It applies to residential houses, apartments and child-occupied facilities such as schools and child care centers built before 1978,
- The training, certification and work practice requirements become effective April 22, 2010. Firms are required to be EPA certified and their employees must be trained by an EPA accredited trainer, and
- The use of lead-safe work practices that minimize occupants' exposure to lead hazards must be followed.

Further information on RRP Rule is available at www.epa.gov/lead/pubs/renovation.htm.

Additionally, please note that the EPA 406b Pre-Renovation Education requirements have been in effect for several years. The purpose of the PRE rule is disclosure when disturbing painted surfaces in pre-1978 housing:

- In pre-1978 housing, contractors must distribute EPA's pamphlet, "Renovate Right" to the owner and occupants before renovation starts,
- In a child-occupied facility, contractors must distribute the pamphlet to the owner of the building or an adult representative of the child-occupied facility before renovation starts,
- For work in common areas of multi-family housing or child-occupied facilities, contractors must distribute renovation notices to tenants or parents/guardians of the children attending the child-occupied facility or you must post informational signs,
- Informational signs must be posted where they will be seen, describe the nature, locations and dates of the renovations and be accompanied by the lead pamphlet or by information on how tenants or parents and guardians can get a free copy, and,
- Confirmation of receipt of the lead pamphlet must be obtained and records must be kept for three years.

Further information on the PRE Rule is available at <http://www.epa.gov/lead/pubs/leadrenf.htm>

If you would like further information on the RRP or PRE Rules, please feel free to contact the CT DPH Lead Poisoning Prevention and Control Program at (860) 509-7299.

cc: Suzanne Blancaflor, M.S., Chief, Environmental Health Section
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