

Please list all types of facilities and locations at which training will take place and indicate if you plan to train at nonpermanent facilities. Attach additional sheets of paper, as necessary.

See attached

Type of Facility	Street Address, Suite Number (Please no P.O. Box)	City	State	Zip Code
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Type of Facility	Street Address, Suite Number (Please no P.O. Box)	City	State	Zip Code
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Do you plan to provide training at non-permanent facilities Yes No

Note: A non-permanent facility is accessed by the training provider (typically through a rental or short-term lease agreement) on a one-time or occasional basis. This would include motel facilities and other locations that serve as a temporary training location.

C. Qualifications of Training Program Manager

Name of Training Program Manager:	Neitner	Thomas	Gene
	Last	First	Middle

Training Program Manager's Title: Director of Training and Education

Previous and/or Maiden Name(s), if applicable: NA

Teaching Workers or Adults Requirement of §745.225(c)(1)(i), (ii), or (iii):

Check one of the following:

Experience or Education or Training or Bachelors or graduate degree in any field or Experience managing a training program specializing in environmental hazards

Check the supporting documentation attached for the box checked above:

Experience	Education	Training	Bachelors	Management Experience
<input checked="" type="checkbox"/> Resume	<input type="checkbox"/> Diploma	<input type="checkbox"/> Certificate	<input type="checkbox"/> Diploma	<input type="checkbox"/> Resume
<input type="checkbox"/> Letter of Reference	<input type="checkbox"/> Transcript		<input type="checkbox"/> Transcript	<input type="checkbox"/> Letter of Reference
<input type="checkbox"/> Documentation of Work Experience				<input type="checkbox"/> Documentation of Work Experience

Construction Industry Requirement of §745.225(c)(1)(iv):

Check one of the following:

Experience or Education or Training

Check the supporting documentation attached for the box checked above:

Experience	Education	Training
<input checked="" type="checkbox"/> Resume	<input type="checkbox"/> Diploma	<input type="checkbox"/> Certificate
<input type="checkbox"/> Letter of Reference	<input type="checkbox"/> Transcript	
<input type="checkbox"/> Documentation of Work Experience		

D. Qualifications of Principal Course Instructor (Attach a separate sheet for each individual.)

Name of Principal Course Instructor for each course: See attached
(If more than one, attach additional sheets.)

Last	First	Middle
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Previous and/or Maiden Name(s), if applicable:

Teaching Workers or Adults Requirement of §745.225(c)(2)(i):

Check one of the following:

Experience or Education or Training

Check the supporting documentation attached for the box checked above:

Experience	Education	Training
<input type="checkbox"/> Resume	<input type="checkbox"/> Diploma	<input type="checkbox"/> Certificate
<input type="checkbox"/> Letter of Reference	<input type="checkbox"/> Transcript	
<input type="checkbox"/> Documentation of Work Experience		

Completion of (16 hrs) Accredited Lead-specific Training Requirement of §745.225(c)(2)(ii):

Check as many that apply and complete information for each. Attach additional sheets of paper, as necessary.

Discipline: Inspector Supervisor Risk Assessor Project Designer Abatement Worker
 Renovator (8hrs) Dust Sampling Technician (8hrs)

Name of Trainer: _____ Name of Training Program: _____

Training Program Address: _____
 Street Address, Suite Number _____ City _____ State _____ Zip Code _____Training Program Phone #: _____ ext. _____ Date Training Completed: _____
 Month/Day/Year _____

Training Certificate Identification Number: _____

Construction Industry Requirement of §745.225(c)(2)(iii):

Check one of the following:

Experience or Education or Training

Check the supporting documentation attached for the box checked above:

Experience	Education	Training
<input type="checkbox"/> Resume	<input type="checkbox"/> Diploma	<input type="checkbox"/> Certificate
<input type="checkbox"/> Letter of Reference	<input type="checkbox"/> Transcript	
<input type="checkbox"/> Documentation of Work Experience		

E. Lead-Based Paint Activity or Renovation Violations

Does training Program have any past, present, or pending lead based paint activity, or renovation violations of EPA, state, U.S. territory, or Indian tribal land(s) regulations? If yes, please attach a _____ Yes Yes No written explanation.

F. Certification of Course Training Material

I certify that I am using the course training materials as marked in the boxes below for each of the courses that I am seeking accreditation as required by §745.225(b)(1)(iii). My signature in Section I applies to this Section F.

	Inspector	Supervisor	Risk Assessor	Project Designer	Abatement Worker	Renovator	Dust Sampling
EPA Recommended Training Materials	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>				
Authorized State course/program	<input type="checkbox"/>	<input type="checkbox"/>					
Other LBP Training	<input type="checkbox"/>	<input type="checkbox"/>					

G. Re-accreditation Applicants Only

Use the following space to describe any changes to the training facility equipment or course materials since the training program's last application was approved. Attach additional sheets of paper as necessary.

H. Additional Information

Use the following space for any additional information or comments that you feel are relevant and want EPA to consider with your application. Attach additional sheets of paper as necessary.

See attached.

Accreditation of Lead-Based Paint Activity and Renovation Training Programs by the National Center for Healthy Housing

Summary of NCHH's Application:

NCHH is an existing EPA-accredited training provider for the initial and refresher Certified Lead Renovator Courses – NAT-RV-I-18351-1-EN and NAT-RV-R-18351-1-EN. NCHH seeks EPA's approval to deliver the Initial Certified Lead Renovator Course in English using the electronic learning format. It will deliver the training in a format consistent with the U.S. Environmental Protection Agency's (EPA) "Model Renovation, Repair and Painting (RRP) Rule E-learning Course Component Implementation Requirements" dated September 30, 2009 and posted at www.epa.gov/lead/pubs/elearningimplementation.pdf.

NCHH will use the Custom Electronic Design & Installation (CEDIA) E-learning program at www.briljent.com/samples/epa/ coupled with its training program as described below.

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A. NCHH's Non-Profit Status

In its April 21, 2009 initial accreditation to conduct initial and refresher certified renovator training in English, NCHH submitted its official IRS letter confirming NCHH's designation as a 501(c)(3). In its August 14, 2009 letter to NCHH, EPA approved NCHH's initial accreditation. There has been no change since in NCHH's status as a 501(c)(3) since that application. This information should satisfy the required documentation in Part A of the current application.

B. NCHH's Training Program Manager

In its April 21, 2009 initial application to conduct initial and refresher certified renovator training in English, NCHH designated Tom Neltner as its Training Program Manager and provided his resume as supporting documentation that he meets the requirements of 40 CFR 745.225(c)(1). In its August 14, 2009 letter to NCHH, EPA approved NCHH's initial accreditation. Other than continuing to serve as NCHH's Director of Training and Education, there has been no change in Tom Neltner's qualifications. This information should satisfy the required documentation in Part C for the training program manager.

C. NCHH's Principal Course Instructors

In its April 21, 2009 initial application and subsequent correspondence to EPA to conduct initial and refresher certified renovator training in English, NCHH identified its principal course instructor and provided supporting documentation that she meets the requirements of 40 CFR 745.225(c)(2). In its August 14, 2009 letter to NCHH, EPA approved NCHH's initial accreditation. NCHH has periodically submitted the names and documentation for additional principal course instructors to EPA. As confirmed by EPA, these submissions were effective when submitted after NCHH received EPA's approval on August 14, 2009.

NCHH will have its principal course instructors conduct the hands-on and classroom portions of the Initial Certified Lead Renovator course in the electronic learning format. Since the qualifications for the electronic learning format are the same as those for the course in the previous approved format, the information previously submitted should satisfy the required documentation in Part D for the principal course instructors.

D. NCHH's Training Facilities

NCHH will deliver this training at non-permanent facilities. In its April 21, 2009 initial application and subsequent correspondence to EPA to conduct initial and refresher certified renovator training in English, NCHH provided the minimum requirements details of its non-permanent facilities where NCHH will deliver the training consistent with 40 CFR 745.225. In its August 14, 2009 letter to NCHH, EPA approved NCHH's initial accreditation.

NCHH will use the same non-permanent facility description for its delivery of the training in the electronic learning format with one variation. NCHH may offer the course in the morning and again in the afternoon. In this situation, it may have the students in both deliveries come into one room to administer the course review and the course test. As a result, in this situation there may be up to 50

students in the room – but no more – for the course review and the course test. This arrangement will not affect the hands-on portion of the course.

This arrangement is consistent with EPA’s “Model Renovation, Repair and Painting (RRP) Rule E-learning Course Component Implementation Requirements” and its model curriculum for the Initial Certified Renovator course because the course review is not a required element of the course. It is in addition to the hands-on activities, the course test, and the E-leaning program. When administering the exam, NCHH will maintain a ratio of at least 1 proctor for 15 students when delivering the exam.

Minimum Facility Requirements for All Training Courses:

The room is large enough for each student to:

1. Have a chair and access to a table during the lecture portions of the training so they can lay the binder on the table and take notes.
2. Have space to conduct required hands-on activities. The amount of space varies with the course as noted below.
3. Allow students to have uninterrupted viewing of the course materials projected on a wall or screen by a computer projector.
4. Allow students to take the test sitting in a chair at a table with no less than three feet to the next person in any direction. The students will be allowed to spread out into the hands-on activity area.
5. Ensure that students can be monitored while taking the exam by the Principal Instructor or Principal Instructor’s designee.

The students shall have access to sufficient doors, hard surface window sills, and hard surface floors to allow students to conduct the required hands-on exercises. Students will be divided into groups of three with no more than three groups per instructor. The instructor will be in the middle of the three groups. In general, the each set of nine students will need access to the following:

1. One window sill or a horizontal surface set up to simulate a window sill;
2. Either one door frame or a wall large enough to simulate a door frame;
3. Ten square feet of hard floor surface; and
4. One hundred square feet of floor surface (including the hard floor surface above).

E. NCHH’s Training Supplies and Equipment:

NCHH will to use the same training supplies that it uses for the Initial Certified Renovator course in English. In its April 21, 2009 initial application and subsequent correspondence to EPA to conduct initial and refresher certified renovator training in English, NCHH provided the list of supplies NCHH will use to deliver the training consistent with 40 CFR 745.225. In its August 14, 2009 letter to NCHH, EPA approved NCHH’s initial accreditation.

Consistent with its current course delivery, NCHH will provide each student with a copy of EPA’s model curriculum for the course. EPA’s “Model Renovation, Repair and Painting (RRP) Rule E-learning Course Component Implementation Requirements” only requires that the student be able to download the EPA model curriculum. However, NCHH believes it is important for the student to

have the materials during the hands-on activities and the course review and will provide the students with the materials at the beginning of the class.

NCHH regularly monitors changes in the equipment technology. It will update equipment used in the training as it becomes aware of changes in a manner consistent with its Quality Control Plan. NCHH will also ensure that damaged equipment is replaced when needed.

F. Conducting Hands-on Skills Assessment

In its April 21, 2009 initial application and subsequent correspondence to EPA to conduct initial and refresher certified renovator training in English, NCHH provided a description for the activities and procedures to conduct the hands-on skills assessment consistent with 40 CFR 745.225. In its August 14, 2009 letter to NCHH, EPA approved NCHH's initial accreditation.

NCHH will conduct the hands-on skills assessment consistent with its current approval with three variations:

- It will limit the student to instructor ratio to six students to one instructor. This is consistent with EPA's model curriculum for the course.
- It will provide at least 30 more minutes of hands-on activities. This additional time will allow the student to better absorb the materials.
- It will require demonstrations on the proper use and maintenance of a HEPA vacuum.

NCHH will ensure the training facility meets the requirements described above. It will ensure that there is at least one Principal Instructor conducting the training. The Principal Instructor may rely on Guest Instructors to assist in the hands-on skills exercises.

NCHH will grade the hands-on skills assessment on a pass/fail basis. NCHH will use the form in the EPA model curriculum in Appendix 6 at page A6-5. This form – written by NCHH for EPA – explains clearly the proficiency that each student must demonstrate. Each student will have a form. The student will not have completed the hands-on skills assessment exercise until the qualified instructor or guest instructor has initialed each of the eleven exercises and the qualified instructor has signed the bottom of the form.

G. Course Test Blueprint

In its April 21, 2009 initial application and subsequent correspondence to EPA to conduct initial and refresher certified renovator training in English, NCHH provided a course test blueprint consistent with 40 CFR 745.225. In its August 14, 2009 letter to NCHH, EPA approved NCHH's initial accreditation. NCHH intends to use the same course blueprint deliver to use the same training supplies that it uses for the Initial Certified Renovator course in English.

NCHH will use its current 25-question, multiple-choice exam based on the following allocation of questions.

Learning Objectives for the Course (from page 2 of instructors manual)	# of Questions on Exam
Understand the Federal, State, and Indian Tribe regulatory requirements for lead dust clearance testing.	4-6

Conduct a visual inspection and correctly identify visible dust, debris, and deteriorated paint.	2-4
Appropriately determine where to take dust samples and how to develop a sampling strategy.	3-5
Collect dust samples in accordance with standard acceptable procedures.	2-4
Interpret the results of a laboratory analysis for lead in dust correctly.	3-5
Apply these skills to conduct an appropriate lead dust clearance test in post-renovation and other circumstances.	2-3
Write a complete, accurate, and understandable report of sampling results.	3-4
Total	25

When EPA releases its model course test blueprint, NCHH will evaluate it and use it if it meets NCHH's quality standards.

H. Digital Photo Submissions

In its April 21, 2009 initial application and subsequent correspondence to EPA to conduct initial and refresher certified renovator training in English, NCHH described its procedures for digital photo submissions consistent with 40 CFR 745.225. In its August 14, 2009 letter to NCHH, EPA approved NCHH's initial accreditation. NCHH will deliver the training in a manner consistent with its existing approvals and commitments.

I. Course Completion Certificates

In its April 21, 2009 initial application and subsequent correspondence to EPA to conduct initial and refresher certified renovator training in English, NCHH described its procedures for publishing and distributing course completion certificates consistent with 40 CFR 745.225. In its August 14, 2009 letter to NCHH, EPA approved NCHH's initial accreditation. NCHH will deliver the training in a manner consistent with its existing approvals and commitments using the course approval number provided by EPA.

J. Recordkeeping Requirements

In its April 21, 2009 initial application and subsequent correspondence to EPA to conduct initial and refresher certified renovator training in English, NCHH described its procedures for maintaining records consistent with 40 CFR 745.225. In its August 14, 2009 letter to NCHH, EPA approved NCHH's initial accreditation. NCHH will maintain its records in a manner consistent with its existing approvals and commitments.

K. Quality Control Plans

In its April 21, 2009 initial application and subsequent correspondence to EPA to conduct initial and refresher certified renovator training in English, NCHH provided its quality control plans consistent with 40 CFR 745.225. In its August 14, 2009 letter to NCHH, EPA approved NCHH's initial accreditation.

NCHH will follow the same quality control plan. It will deliver the training in a format consistent with the U.S. Environmental Protection Agency's (EPA) "Model Renovation, Repair and Painting (RRP) Rule E-learning Course Component Implementation Requirements" dated September 30, 2009 and posted at www.epa.gov/lead/pubs/elearningimplementation.pdf.

NCHH will use the Custom Electronic Design & Installation (CEDIA) E-learning program at www.briljent.com/samples/epa/ coupled with its training program as described below.

As part of these additional requirements for the E-learning format, NCHH will ensure that CEDIA's Learning Management System will:

- Area 1: Registration:
 - Obtain identifying information including name, organization, telephone, and email from the student prior to taking the e-learning course.
 - Provide the student with a username and password.
 - Have the student certify that the student will not share the username and password with anyone else.
 - Require the student to use the username and password to access the system.
 - Track the student's log-ins, launches, progress, and completion by their username.
 - Provide access by web and by phone to a database of those who have received E-learning course completion certificates.
 - Give the students up to 60 days to complete the E-learning course and review the materials in preparation for the hands-on activities and course test administered by NCHH.
- Area 2: E-learning Content:
 - Continue to be consistent with EPA's posted model E-learning course.
 - Continue for students to meet the 43 objectives listed in EPA's guidance.
 - Revise its materials when it becomes aware of problems or shortcomings with the content, programming or delivery of the E-learning course.
- Area 3: Tracking Progress
 - Allow the student to exit the program and return to the last page they viewed and not repeat modules they have complete.
 - Require the student to complete each module of the training.
 - Require the student to click the submit button for each of the knowledge checks with the correct answer in order to complete the module.
 - Require the student to complete each module before being allowed to take the final assessment.
- Area 4: Assessments
 - Include interim knowledge checks within each module consisting of at least two to three questions to review course content and provide feedback if the student does not respond correctly.
 - Require students that have completed all modules to complete a 20-question test that evaluates a student's understanding of the full range of course material.
 - Randomly draw the 20 questions from a 60 question test bank.
 - Require students to have a score of at least 80% on the test to successfully complete the course and receive an E-learning course completion certificate.
 - If the student receives a score of less than 80%, mark the modules dealing with the topic addressed by each of the missed questions on the test as incomplete and require the student to review the modules to be able to retake the E-learning course test with a new

randomly selected set of questions. *This approach is more stringent than the EPA requirements since the student needs to retake the entire test and not just the questions dealing with the topics that the student missed.*

- Area 5: Student Questions Regarding E-learning Materials
 - Allow students to submit questions to an email address monitored by CEDIA.
 - Will respond to the questions within less than 24 hours during the work week and by the close of business on Monday for questions received over a weekend.
 - Develop and maintain a Frequently Asked Questions page students can access during the training from the CEDIA E-learning training website.
- Area 6: E-learning Completion Activities
 - The topic addressed by the question missed on the exam. Not duplicate any of the questions used in the CEDIA E-learning with its course exam;
 - Provide students with a PDF image of their E-learning course completion certificate only when they have reviewed all elements of the course materials including pop-up and dialog boxes and have successfully completed the E-learning course exam.
 - Assign a unique identification number to the E-learning course completion certificate and include that number on the certificate.
 - Include the unique identification number, student's name, student's username, and CEDIA's information on the E-learning course completion certificate.
- Area 7: Student Tracking and Verification
 - Allow students to obtain PDF images of their E-learning course completion certificate.
 - Prohibit the generation of more than one E-learning course completion certificate with its unique identification number for each username.

NCHH will:

- Enter into a written agreement with CEDIA to establish their respective roles and responsibilities.
- Require students to provide a copy of the E-learning course certificate before or at the beginning of the training.
- Conduct the hands-on training, the course review and course test as described in this document.
- Review any relevant state or local regulations affecting renovations.
- Keep a copy of the E-learning course certificate submitted by the student.
- After the class but before issuing its Initial Certified Lead Renovator Certificate, verify a student's E-learning course completion through CEDIA's database.

L. Curriculum

NCHH will use the CEDIA E-learning program at www.briljent.com/samples/epa/ coupled with its hands-on / classroom training program. It will deliver the training in a format consistent with the U.S. Environmental Protection Agency's (EPA) "Model Renovation, Repair and Painting (RRP) Rule E-learning Course Component Implementation Requirements" dated September 30, 2009 and posted at www.epa.gov/lead/pubs/elearningimplementation.pdf.

The CEDIA E-learning program is based on the EPA E-learning program. CEDIA made the following enhancements:

- Moved some of the text into pop-up boxes that show up when the student clicks on or rolls over the hyperlink. Students will be required to view each of the pop-up boxes before moving to the next slide.
- Added some slides at the beginning to provide context on the rule based on NCHH's experience of the problems students have with the EPA model curriculum. Students have found this context to be helpful in understanding how the rule will impact them and what the key terms mean. For example, the term renovation covers major repair and maintenance.
- Uses the term “old paint” to refer to paint in pre-1978 target housing or child-occupied facility. NCHH has found that students struggle with EPA’s use of the term “lead-based paint.” In the student’s mind, it is not lead-based paint until it has been tested and confirmed to be lead-based paint. NCHH believes that the term old paint – properly defined – better captures the impact of the presumption. While lead-based paint is clearly the focus of the RRP rule, the rule itself at 40 CFR Part 745 Subpart E does not define lead-based paint and the definition of renovation is based on “the disturbance of painted surfaces” not the disturbance of lead-based painted surfaces. Old paint is a more effective term for certified renovators.

NCHH will deliver the course in a minimum of four hours including between 2.5 and three hours of hands-on exercises, 0.5 to one hour of course review, and 0.5 hour for course test. Using EPA’s method of counting which includes breaks, the course will take 4.25 hours with 265 minutes of actual training time.

Delivering Hands-on Exercises

NCHH plans to use the Environmental Management Institute’s variation on the hands-on training already approved by EPA for the initial certified renovator course. In this variation, students are assigned to groups of between two and three students each. An instructor is assigned to one to three groups.

Each group will be expected to complete the entire set of exercises except the paint test kit exercise which must be performed by each student individually. The approach uses more supplies but it engages all of the students. In such small groups, each student must get involved if they are to get the work done on time.

The instructor stands in the middle of the three groups and walks the groups through the exercise. He takes the groups through each of the steps in the process and tells them not to move ahead until all groups have completed a particular step. As each group completes the step, the instructor inspects their work, gives them advice that may include starting over or adjusting their work if it is not done correctly. If it is done correctly, the instructor signs the forms for the students. This stepwise approach synchronizes the class and allows the students to learn from the other groups.

Study Guide and Course Review of Compliance Guide

The exercises will take between 2.5 and 3 hours. If the groups move quickly through the exercises, they will take a minimum of 2.5 hours. In this situation, the instructor will take the students through a four-page study guide until they have reached the three hour mark. The study guide is attached. It is designed to remind students of the key points they need to know about the RRP rule. It will allow for the group learning and discussion that the E-learning misses.

When the groups assemble, the principal instructor will walk them through the attached PowerPoint. In essence, it is a facilitated reading of EPA's Small Entity Compliance Guide. They will have the guide in the appendix of the EPA Model Curriculum materials that each student will get at the beginning of class. The class discussion will enable the students to get the finer points. The PowerPoint highlights the key points.

Alternative A – Standards Scenario – Typically Offered in Morning			
Activity	Format	Duration	Typical Time
Registration / Take Photos / Assignments	Working with each student	15 minutes	8:30 to 8:45
Welcome and Introductions	Small Group – 1 instructor to 9 students	5 minutes	8:45 to 8:50
Dust Exercise	Small Group	5 minutes	8:50 to 8:55
Paint Test Kit Exercise	Small Group – each student must complete on their own	15 minutes	8:55 to 9:10
Renovation Exercise Part 1 (per existing EMI format)	Small Group	80 minutes	9:10 to 10:30
<i>Break</i>		15 minutes	10:30 to 10:45
Renovation Exercise Part 2 (per existing EMI format)	Small Group	75 minutes	10:45 to 12:00
<i>Study Guide Exercise (only if time is available)</i>	<i>Small Group</i>	<i>0 to 30 minutes</i>	<i>11:30 to 12:00 (optional)</i>
Review of Small Entity Compliance Guide (see attached PowerPoint)	In classroom at tables	30 minutes	12:00 to 12:30
Examination	In classroom at tables	30 minutes	12:30 to 1:00

NCHH will also offer the course in the following format to allow the course to be offered twice a day and make the most use of the instructors. Under this approach, students in the afternoon course will join the students in the morning course for the review of EPA's Small Entity Compliance Guide and then take the test. All students will be invited to take the test after the afternoon session if they failed it at during the lunch session. The classroom will be large enough to meet hold both groups up to a maximum of 50 students in a facility that meets the standards described above. The following is the typical schedule for the Afternoon session.

Alternative B – Optional Afternoon Scenario			
Activity	Format	Duration	Typical Time
Registration / Take Photos / Assignments	Working with each student	15 minutes	11:45 to 12:00
Review of Small Entity Compliance Guide (see attached PowerPoint)	In classroom at tables	30 minutes	12:00 to 12:30

Examination	In classroom at tables	30 minutes	12:30 to 1:00
Welcome and Introductions	Small Group – 1 instructor to 9 students	5 minutes	1:00 to 1:05
Dust Exercise	Small Group	5 minutes	1:05 to 1:10
Paint Test Kit Exercise	Small Group – each student must complete on their own	15 minutes	1:10 to 1:25
Renovation Exercise Part 1 (per existing EMI format)	Small Group	80 minutes	1:25 to 2:45
<i>Break</i>		15 minutes	2:45 to 3:00
Renovation Exercise Part 2 (per existing EMI format)	Small Group	75 minutes	3:00 to 4:15
<i>Study Guide Exercise (only if time is available)</i>	<i>Small Group</i>	<i>0 to 30 minutes</i>	<i>3:45 to 4:15 (optional)</i>
<i>If students failed the exam at the beginning of the course, they will be able to retake the exam at the end of the hands-on after reviewing the Study Guide</i>	<i>In classroom at tables</i>	<i>30 minutes</i>	<i>4:15 to 4:45</i>

Training Facility: NCHH will ensure that Principal Instructors offer the training in a facility that meets the minimum requirements for the training facilities as described above.

Course Binder: NCHH will ensure that each student receives a copy of the student manual as described above as well as the study guide.

Instructors: NCHH will ensure that there is at least one Principal Instructor conducting the training. The Principal Instructor may rely on Guest Instructors to assist in the hands-on skills exercises with no more than nine students per hands-on skills instructor.

Module 1:

1. Lead paint was banned from residential paint in the U.S. starting in _____.
2. Lead-based paint contains lead at or above _____ milligrams per square centimeter.
3. One gram contains _____ milligrams and _____ micrograms.
4. Children usually get lead poisoning through _____.
5. Adults more commonly get lead poisoning through _____.
6. How do you test for lead poisoning? _____
7. Lead-based paint is most often ingested or inhaled in what form? _____

Module 2:

1. The RRP rule is enforced by what agency? _____
2. The RRP rule applies to these buildings: _____ and _____.
3. Four exclusions from the RRP are _____;

_____.
4. To be excluded as minor, work must disturb less than this area of paint (*de minimis*)
interior: _____ exterior: _____.
5. Even if paint disturbed is less than the *de minimis*, RRP always covers:

_____.
6. OSHA rules are designed to protect _____.
7. HUD rules must be followed when using _____ funds.
8. Firms performing work covered by RRP must be _____
before _____ (date).
9. To become a certified renovator, you must _____
_____.
10. To stay certified, a renovator must take refresher training every _____ years.
11. Everyone performing RRP work must be a _____
or _____.

Module 3:

1. Pre-renovation education requires you to:
 - a. Provide the *Renovate Right* brochure before beginning work to the _____ and _____. Also, in child-occupied facilities _____;
 - b. Document that _____;
 - c. Maintain a record for _____ years.
2. To determine the presence of lead-based paint, a certified renovator is allowed to use a _____, but only a certified inspector or risk assessor can use a _____.

Module 4:

1. To prevent access to the work area, you must _____ and _____.
2. Interior work areas, including floors, other horizontal surfaces, and furniture, must be covered at least _____ feet from the disturbed paint (if possible).
4. To contain dust in the work area, you seal _____, _____, and _____ (covering one to allow access).
5. Exterior work areas are covered at least _____ feet or more to catch paint.
6. Protect all doors and window within _____ feet of disturbed paint on the exterior.
7. The plastic covering the work area should be _____.

Module 5:

1. OSHA requires respirators and other protection, if the air exceeds _____ $\mu\text{g}/\text{m}^3$.
2. Personal protective equipment recommended includes:

_____;
3. RRP prohibits three work practices:

_____;
4. What common work practice is likely to produce high levels of airborne dust?

Module 6:

1. Two cleaning methods are _____ and _____.
2. Four basic rules of cleaning are: _____;
_____;
_____;
_____.
3. Clean at least _____ feet beyond the plastic covering the floor of the work area.
4. Carpet cleaning requires _____.
5. What does HEPA mean? _____
6. If you fail to pass the Cleaning Verification, you must _____
and _____.
7. If you fail the Cleaning Verification twice, what is different about the final cleaning?

8. Cleaning Verification must be performed by _____.
9. Clearance examination must be performed by a certified _____,
_____, or _____.
10. Clearance examination is most frequently required on _____ projects.
11. Exterior cleaning verification requires only _____.

Module 7:

1. Records that may be needed before the job begins:
_____;
_____;
_____;
_____.
2. Two records must be at the job site: _____
and _____.
3. Report(s) generated after the job is done: _____
and _____.
4. RRP records must be retained for _____ years.

Module 8:

1. All workers on a RRP project must be trained by a _____
in _____.

2. Records that must be on-site are _____
and _____.

The certified renovator must be on-site during _____ and
_____.

3. LeadCheck paint testing must be done by a _____.

4. Cleaning Verification must be done by a _____.

Small Entity Compliance Guide to Renovate Right: EPA's Lead-Based Paint Renovation, Repair and Painting Program



This book tells you what you need to do to comply the rule.

The course test is based on this book. Know this book and you will do well on the test.

Keep the book on the job as your reference.

Who Should Read this Handbook?

- Anyone who owns or manages housing or child-occupied facilities built before 1978.
- Contractors who perform activities that disturb painted surfaces in homes and child-occupied facilities built before 1978 (including certain repairs and maintenance, and painting preparation activities).

About this Handbook

This handbook summarizes requirements of EPA's Lead-Based Paint Renovation, Repair and Painting Program Rule, aimed at protecting against lead-based paint hazards associated with renovation, repair and painting activities. The rule requires workers to be trained to use lead-safe work practices and requires renovation firms to be EPA-certified; these requirements will become effective April 22, 2010.

To ensure compliance, you should also read the complete rule on which the program is based. While EPA has summarized the provisions of the rule in this guide, the legal requirements that apply to renovation work are governed by EPA's 2008 Lead Rule. A copy of the rule is available on EPA's website at www.epa.gov/lead/pubs/renovation.

A companion pamphlet, entitled *Renovate Right: Important Lead Hazard Information for Families, Child Care Providers, and Schools* (EPA-740-F-08-002), has been prepared in conjunction with the rule for distribution to persons affected by work that disturbs lead-based paint. (See page 17 for information on how to get copies of the rule, the *Renovate Right* pamphlet, and other related materials).

Other state or local requirements that are different from or more stringent than the federal requirements may apply in your state. For example, federal law allows EPA to authorize states to administer their own program in lieu of the federal lead program. Even in states without an authorized lead program, a state may promulgate its own rules that may be different or go beyond the federal requirements. For more information on the rules that apply in your state, please contact the National Lead Information Center at 1-800-424-LEAD (5323).

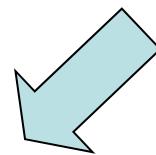
Your feedback is important. Please review this guide and contact the National Lead Information Center at 1-800-424-LEAD (5323) with any comments regarding its usefulness and readability, and improvements you think are needed.

About the Lead Hazard Information Pamphlets

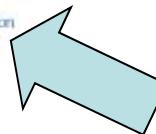
In 1998, EPA issued a Pre-Renovation Education Rule requiring contractors and workers to distribute EPA's lead information pamphlet, *Protect Your Family from Lead in Your Home*. EPA's 2008 Lead-Based Paint Renovation, Repair and Painting Program Rule, which is the subject of this small entity compliance guide, also updates sections of the 1998 Pre-Renovation Education Rule. For example, the requirements of the Pre-Renovation Education Rule were amended to require that contractors disseminate the March 2008 *Renovate Right* pamphlet instead of the *Protect Your Family from Lead in Your Home* pamphlet beginning in December 2008 (although either can be used up until then).

This document is published by the Environmental Protection Agency (EPA) as the official compliance guide for small entities, as required by the Small Business Regulatory Enforcement Fairness Act of 1996 (SBREFA). Before you begin using the guide, you should know that the information in this guide was compiled and published in June 2008. EPA is continually improving and upgrading its rules, policies, compliance programs, and outreach efforts. To find out if EPA has revised or supplemented the information in this guide call the National Lead Information Center at 1-800-424-LEAD (5323).

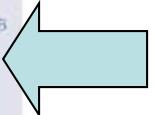
Book is no substitute for reading the complete rule. The rule is at www.epa.gov/lead/pubs/renovation.



State and local requirements may be more stringent. Call 800-424-5323 to check.



The book is based on the rule as of June 2008



Rule published in April 22,
2008 *Federal Register*.

What Is the Lead-Based Paint Renovation, Repair and Painting Program (RRP)?

- The Lead-Based Paint Renovation, Repair and Painting Program 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 day-care centers built before 1978.
- It includes pre-renovation education requirements as well as training, certification, and work practice requirements.
 - Pre-renovation education requirements are effective now:
 - Contractors, property managers, and others who perform renovations for compensation in residential houses, apartments, and child-occupied facilities built before 1978 are required to distribute a lead pamphlet before starting renovation work.
 - Training, certification, and work practice requirements become effective April 22, 2010:
 - Firms are required to be certified, their employees must be trained in use of lead-safe work practices, and lead-safe work practices that minimize occupants' exposure to lead hazards must be followed.
- Renovation is broadly defined as any activity that disturbs painted surfaces and includes most repair, remodeling, and maintenance activities, including window replacement.
- The program includes requirements implementing both Section 402(c) and 406(b) of the Toxic Substances Control Act (TSCA). (www.epa.gov/lead/pubs/titleten.htm)
- EPA's lead regulations can be found at 40 CFR Part 745, Subpart E.

How Can this Handbook Help Me?

- Understanding the lead program's requirements can help you protect your customers from the hazards of lead and can, therefore, mean more business for you.
- This handbook presents simple steps to follow to comply with the EPA's lead program. It also lists ways these steps can be easily incorporated into your work.
- Distributing the lead pamphlet and incorporating required work practices into your job site will help protect your customers and occupants from the hazards of lead-based paint.

Pre-renovation education
requirements effective **now**.

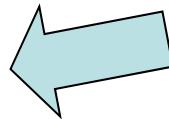
Training, certification and
work practice requirements
effective **April 22, 2010**

Don't be confused by the term
“renovation”. Disturbing
painted surfaces is key.

Who Must Follow the 2008 Lead Rule's Requirements?

In general, anyone who is paid to perform work that disturbs paint in housing and child-occupied facilities built before 1978, this may include, but is not limited to:

- Residential rental property owners/managers
- General contractors
- Special trade contractors, including
 - Painters
 - Plumbers
 - Carpenters
 - Electricians



Who: Anyone **paid** to perform work that disturbs paint in housing and child-occupied facilities built before 1978.

What Activities Are Subject to the Lead Renovation, Repair and Painting Program?

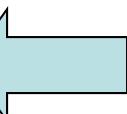
In general, any activity that disturbs paint in pre-1978 housing and child-occupied facilities, including:

- Remodeling and repair/maintenance
- Electrical work
- Plumbing
- Painting
- Carpentry
- Window replacement



What Housing or Activities Are Excluded from the Rule?

- Housing built in 1978 or later.
- Housing for elderly or disabled persons, unless children under 6 reside or are expected to reside there.
- Zero-bedroom dwellings (studio apartments, dormitories, etc.).
- Housing or components declared lead-free by a certified inspector or risk assessor.
- Minor repair and maintenance activities that disturb 6 square feet or less of paint per room inside, or 20 square feet or less on the exterior of a home or building.
- Note: minor repair and maintenance activities do not include window replacement and projects involving demolition or prohibited practices.



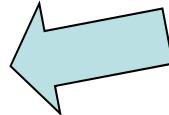
Exempt Housing:

- Built after 1978 or declared lead-free
- Elderly or disabled persons
- Zero bedroom

Exempt Activities: Minor repair & maintenance – 6 ft² inside and 20 ft² outside – but not window replacement or demolition.

Pre-renovation Education:

- Housing v. Child-occupied facilities
- Common areas
- Owners and occupants
- Confirm receipt
- Special rules for parents at child-occupied facilities



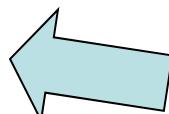
What Does the Program Require Me To Do?

Pre-renovation education requirements - Effective now.

- In housing, you must:
 - Distribute EPA's lead pamphlet to the owner and occupants before renovation starts.
- In a child-occupied facility, you must:
 - Distribute the lead pamphlet to the owner of the building or an adult representative of the child-occupied facility before the renovation starts.
- For work in common areas of multi-family housing or child-occupied facilities, you must:
 - Distribute renovation notices to tenants or parents/guardians of the children attending the child-occupied facility. Or you must post informational signs about the renovation or repair job.
- Informational signs must:
 - Be posted where they will be seen;
 - Describe the nature, locations, and dates of the renovation; and
 - Be accompanied by the lead pamphlet or by information on how parents and guardians can get a free copy (see page 31 for information on obtaining copies).
- Obtain confirmation of receipt of the lead pamphlet (see page 23) from the owner, adult representative, or occupants (as applicable), or a certificate of mailing from the post office.
- Retain records for three years.
- Note: Pre-renovation education requirements do not apply to emergency renovations. Emergency renovations include interim controls performed in response to a resident child with an elevated blood-lead level.

Training, Certification, and Work Practice Requirements-Effective after April 22, 2010.

- Firms must be certified.
- Renovators must be trained.
- Lead-safe work practices must be followed. Examples of these practices include:
 - Work-area containment to prevent dust and debris from leaving the work area.
 - Prohibition of certain work practices like open-flame burning and the use of power tools without HEPA exhaust control.
 - Thorough clean up followed by a verification procedure to minimize exposure to lead-based paint hazards.
- The training, certification, and work practice requirements do not apply where the firm obtained a signed statement from the owner that all of the following are met:
 - The renovation will occur in the owner's residence;
 - No child under age 6 resides there;
 - No woman who is pregnant resides there;
 - The housing is not a child-occupied facility; and
 - The owner acknowledges that the renovation firm will not be required to use the work practices contained in the rule.



Training, Certification & Work Practices

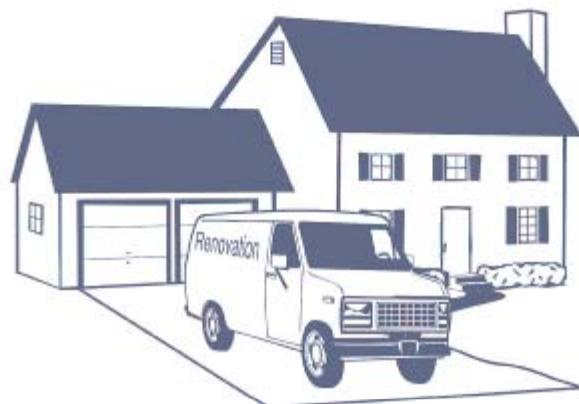
- Opt-out for owner-occupied housing with no children and not pregnant woman.
- Needs signature of owner

When Do These Requirements Become Fully Applicable to Me?

- Update to EPA's "pre-renovation education" requirements
 - Until December 2008, you may use either EPA's lead pamphlet entitled, *Protect Your Family from Lead in Your Home*, or EPA's pamphlet entitled, *Renovate Right*, to comply with the pre-renovation education requirements.
 - Beginning in December 2008, only the *Renovate Right* pamphlet may be used to comply with the requirements.
- Training, certification, and work practice requirements
 - April 2009:
 - Training providers may begin applying for accreditation.
 - Once training providers are accredited, they may offer training courses that will allow renovators to become certified.
 - October 2009 - Renovation firms may begin applying to EPA for certification.
 - April 2010 - Program fully effective. Work practices must be followed.

How Will a Firm Become Certified?

Beginning in October 2009, firms may apply to EPA for certification to perform renovations or dust sampling. To apply, a firm must submit to EPA a completed "Application for Firms," signed by an authorized agent of the firm, and pay the correct amount of fees. To obtain a copy of the "Application for Firms" contact the NLIC at 1-800-424-LEAD (5323) or visit www.epa.gov/lead/pubs/renovation.htm.



- Dec. 2008 – Renovators must distribute "Renovate Right" pamphlet
- April 2009 – Accredited training providers can offer certified renovator training.
- Oct. 2009 – Firms can apply to EPA/State for certification and pay fee.
- April 2010 – Full compliance required.

What Are the Responsibilities of a Certified Firm?

Firms performing renovations must ensure that:

1. All individuals performing activities that disturb painted surfaces on behalf of the firm are either certified renovators or have been trained by a certified renovator.
2. A certified renovator is assigned to each renovation and performs all of the certified renovator responsibilities.
3. All renovations performed by the firm are performed in accordance with the work practice standards of the Lead-Based Paint Renovation, Repair, and Painting Program (see the flowchart on page 9 for details about the work practice standards).
4. Pre-renovation education requirements of the Lead-Based Paint Renovation, Repair, and Painting Program are performed.
5. The program's recordkeeping requirements are met.

How Will a Renovator Become Certified?

To become a certified renovator an individual must successfully complete an eight-hour initial renovator training course offered by an accredited training provider (training providers are accredited by EPA, or by an authorized state or tribal program). The course completion certificate serves as proof of certification. Training providers can apply for accreditation for renovator and dust sampling technician training beginning in April 2009. Once accredited, trainers can begin to provide certification training.

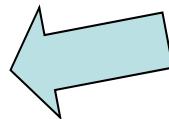
Are There Streamlined Requirements for Contractors with Previous Lead Training?

Yes. Individuals who have successfully completed an accredited lead abatement worker or supervisor course, or individuals who have successfully completed an EPA, Department of Housing and Urban Development (HUD), or EPA/HUD model renovation training course, need only take a four-hour refresher renovator training course instead of the eight-hour initial renovator training course to become certified.

What Are the Responsibilities of a Certified Renovator?

Certified renovators are responsible for ensuring overall compliance with the Lead-Based Paint Renovation, Repair, and Painting Program's requirements for lead-safe work practices at renovations they are assigned. A certified renovator (see the flowchart on page 9 for details about the work practice standards):

1. Must use a test kit acceptable to EPA, when requested by the party contracting for renovation services, to determine whether components to be affected by the renovation contain lead-based paint (EPA will announce which test kits are acceptable prior to April 2010. Please check our Web site at www.epa.gov/lead).
2. Must provide on-the-job training to workers on the work practices they will be using in performing their assigned tasks.



Certified Firm must:

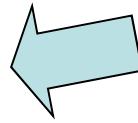
- Be approved by EPA or State.
- Ensure compliance.

Certified Renovator must:

- Be trained
 - 8-hour initial
 - 4-hour refresher.
- Be certified by accredited training provider.
- Ensure compliance.

Renew certification
every five years

3. Must be physically present at the work site when warning signs are posted, while the work-area containment is being established, and while the work-area clearing is performed.
4. Must regularly direct work being performed by other individuals to ensure that the work-practices are being followed, including maintaining the integrity of the containment barriers and ensuring that dust or debris does not spread beyond the work area.
5. Must be available, either on-site or by telephone, at all times renovations are being conducted.
6. Must perform project clearing verification.
7. Must have with them at the work site copies of their initial course completion certificate and their most recent refresher course completion certificate.
8. Must prepare required records.



How Long Will Firm and Renovator Certifications Last?

To maintain their certification, renovators and firms must be re-certified by EPA every five years. A firm must submit to EPA a completed "Application for Firms," signed by an authorized agent of the firm, and pay the correct amount of fees. Renovators must successfully complete a refresher training course provided by an accredited training provider.

What Are the Recordkeeping Requirements?

- All documents must be retained for three years following the completion of a renovation.
- Records that must be retained include:
 - Reports certifying that lead-based paint is not present.
 - Records relating to the distribution of the lead pamphlet.
 - Any signed and dated statements received from owner-occupants documenting that the requirements do not apply (i.e., there is no child under age 6 or no pregnant woman who resides at the home, and it is not a child-occupied facility).
 - Documentation of compliance with the requirements of the Lead-Based Paint Renovation, Repair, and Painting Program (EPA has prepared a sample form that is available at www.epa.gov/lead/pubs/sampleschecklist.pdf).

What Are the Required Work Practices?

The flow charts on the following pages will help determine if your project is subject to the Lead-Based Paint Renovation, Repair and Painting Program's requirements and, if so, the specific requirements for your particular project.

Certified Renovator must personally:

- Train workers
- Be present at:
 - Posting signs
 - Containing work area
 - Cleaning work area
- Be available on-site or by phone
- Perform "post-cleaning verification"
- Use test kit when requested by client
- Prepare records (See Page 29)

Future Sample Renovation Recordkeeping Checklist

(effective April 2010)

Name of Firm: _____

Date and Location of Renovation: _____

Brief Description of Renovation: _____

Name of Assigned Renovator: _____

Name(s) of Trained Worker(s), if used: _____

Name of Dust Sampling Technician, Inspector, or Risk Assessor, if used: _____

— Copies of renovator and dust sampling technician qualifications (training certificates, certifications) on file.

— Certified renovator provided training to workers on (check all that apply):

- Posting warning signs
- Maintaining containment
- Waste handling
- Test kits used by certified renovator to determine whether lead was present on components affected by renovation (identify kits used and describe sampling locations and results): _____
- Setting up plastic containment barriers
- Avoiding spread of dust to adjacent areas
- Post-renovation cleaning

— Warning signs posted at entrance to work area.

— Work area contained to prevent spread of dust and debris

- All objects in the work area removed or covered (interiors)
- HVAC ducts in the work area closed and covered (interiors)

- Windows in the work area closed (interiors)

- Windows in and within 20 feet of the work area closed (exteriors)

- Doors in the work area closed and sealed (interiors)

- Doors in and within 20 feet of the work area closed and sealed (exteriors)

- Doors that must be used in the work area covered to allow passage but prevent spread of dust

- Floors in the work area covered with taped-down plastic (interiors)

- Ground covered by plastic extending 10 feet from work area—plastic anchored to building and weighed down by heavy objects (exteriors)

- If necessary, vertical containment installed to prevent migration of dust and debris to adjacent property (exteriors)

— Waste contained on-site and while being transported off-site

— Work site properly cleaned after renovation

- All chips and debris picked up, protective sheeting misted, folded dirty side inward, and taped for removal

- Work area surfaces and objects cleaned using HEPA vacuum and/or wet cloths or mops (interiors)

— Certified renovator performed post-renovation cleaning verification (describe results, including the number of wet and dry cloths used): _____

— If dust clearance testing was performed instead, attach a copy of report.

— I certify under penalty of law that the above information is true and complete.

Name and title _____

Date _____

Retain at least 3 years.

Also keep records of:

- Certification that lead-based paint is not present.
- Signed statements by owner-occupant that rules do not apply.
- Documentation of pre-renovation education.

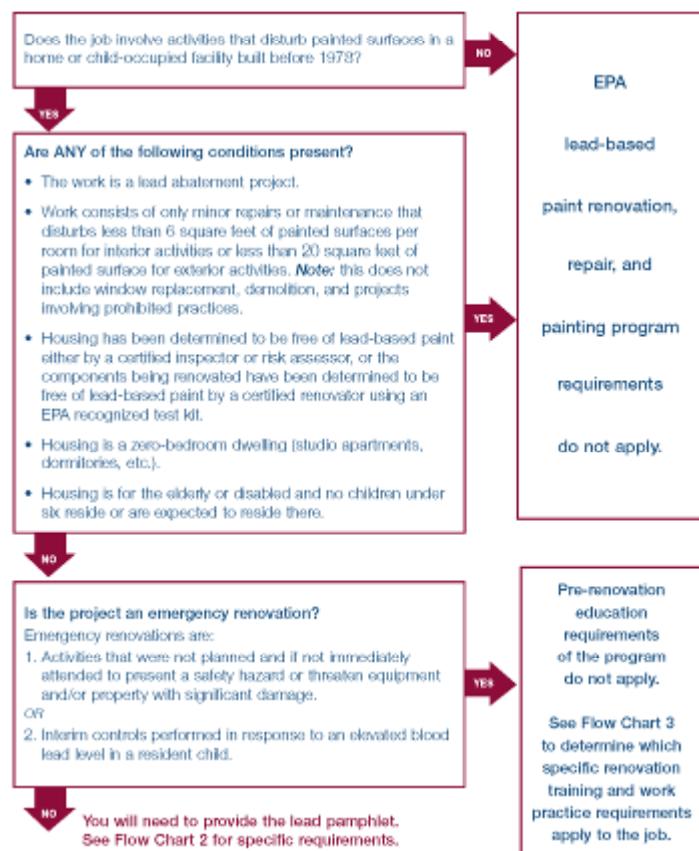
Compliance Flow Charts

- Do the requirements apply to the renovation? Page 7
- How do I comply with the pre-renovation education requirements? Page 8
- Do the renovation training and work practices apply? Page 9
- Work practice requirements
 - General – Page 10
 - Interior renovations – Page 11
 - Exterior renovations – Page 14
- Interior cleaning verification:
 - Visual inspection and optional clearance testing – Page 12
 - Floors, countertops and window sills – Page 13

EPA's Lead Program Rule At-A-Glance

Do the Requirements Apply to the Renovation?

If you will be getting paid to do work that disturbs painted surfaces in a pre-1978 home, apartment building, or child-occupied facility, answer the questions below to determine if the EPA lead program requires you to distribute the lead pamphlet and/or if you will need to comply with training, certification, and work practice requirements when conducting the work.



Flow Chart 1

If you will be getting paid to do work that disturbs painted surfaces in a pre-1978:

- Home
- Apartment building, or
- Child-occupied facility,

Then use this flowchart to determine if the EPA lead program requires you to:

- Distribute the lead pamphlet; and/or
- Comply with training, certification, and work practice requirements.

Does the job involve activities that disturb painted surfaces in a home or child-occupied facility built before 1978?

NO

EPA

YES

Are ANY of the following conditions present?

- The work is a lead abatement project.
- Work consists of only minor repairs or maintenance that disturbs less than 6 square feet of painted surfaces per room for interior activities or less than 20 square feet of painted surface for exterior activities. **Note:** this does not include window replacement, demolition, and projects involving prohibited practices.
- Housing has been determined to be free of lead-based paint either by a certified inspector or risk assessor, or the components being renovated have been determined to be free of lead-based paint by a certified renovator using an EPA recognized test kit.
- Housing is a zero-bedroom dwelling (studio apartments, dormitories, etc.).
- Housing is for the elderly or disabled and no children under six reside or are expected to reside there.

YES

lead-based
paint renovation,
repair, and
painting program
requirements
do not apply.

NO

NO

Is the project an emergency renovation?

Emergency renovations are:

1. Activities that were not planned and if not immediately attended to present a safety hazard or threaten equipment and/or property with significant damage.
- OR
2. Interim controls performed in response to an elevated blood lead level in a resident child.

YES

Pre-renovation education requirements of the program do not apply.

NO

You will need to provide the lead pamphlet.

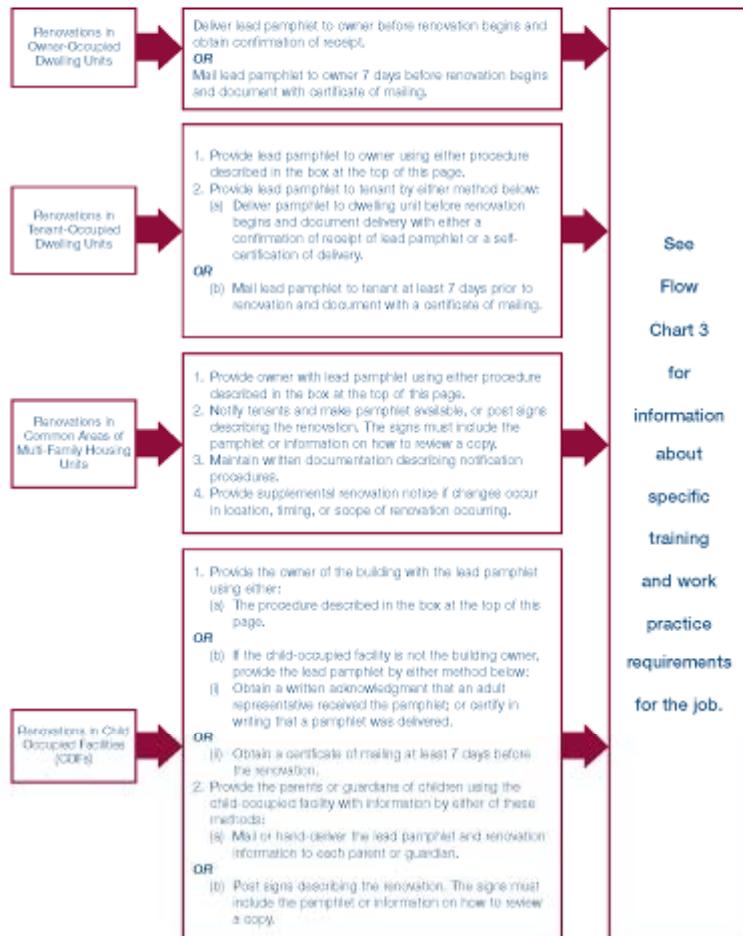
See Flow Chart 2 for specific requirements.

See Flow Chart 3 to determine which specific renovation training and work practice requirements apply to the job.

Requirements to distribute pre-renovation educational materials vary based on the location of the renovation.

How Do I Comply with the Pre-Renovation Education Requirements?

Requirements to distribute pre-renovation educational materials vary based on the location of the renovation. Select the location below that best describes the location of your project, and follow the applicable procedure on the right.



Flow Chart 2

Select the location that best describes the location of your project, and follow the applicable procedure on the right.

Renovations in
Owner-Occupied
Dwelling Units

Deliver lead pamphlet to owner before renovation begins and obtain confirmation of receipt.

OR

Mail lead pamphlet to owner 7 days before renovation begins and document with certificate of mailing.

Renovations in
Tenant-Occupied
Dwelling Units

1. Provide lead pamphlet to owner using either procedure described in the box at the top of this page.

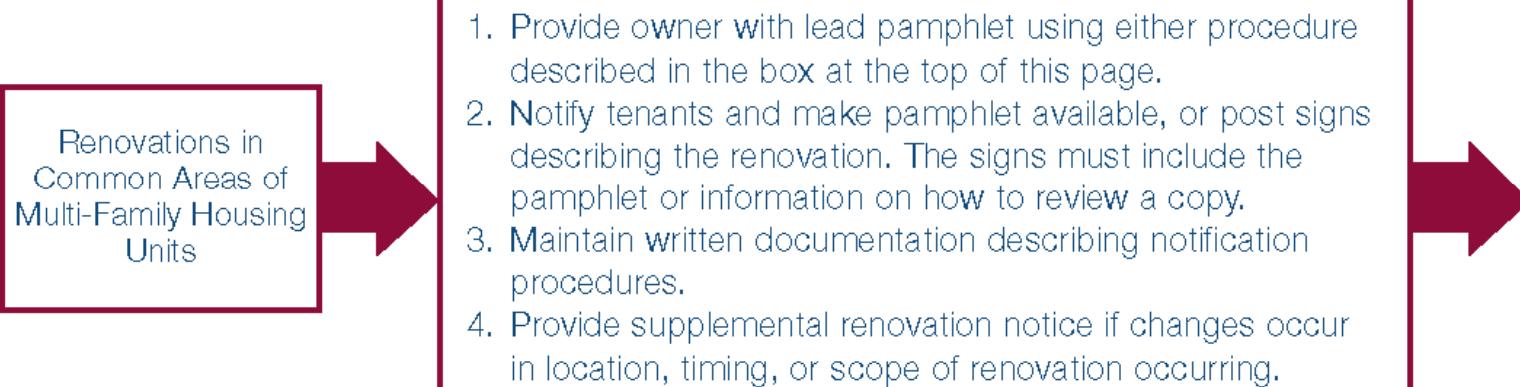
2. Provide lead pamphlet to tenant by either method below:

(a) Deliver pamphlet to dwelling unit before renovation begins and document delivery with either a confirmation of receipt of lead pamphlet or a self-certification of delivery.

OR

(b) Mail lead pamphlet to tenant at least 7 days prior to renovation and document with a certificate of mailing.

Renovations in
Common Areas of
Multi-Family Housing
Units



1. Provide owner with lead pamphlet using either procedure described in the box at the top of this page.
2. Notify tenants and make pamphlet available, or post signs describing the renovation. The signs must include the pamphlet or information on how to review a copy.
3. Maintain written documentation describing notification procedures.
4. Provide supplemental renovation notice if changes occur in location, timing, or scope of renovation occurring.

Renovations in Child Occupied Facilities (COFs)

1. Provide the owner of the building with the lead pamphlet using either:
 - (a) The procedure described in the box at the top of this page.

OR

 - (b) If the child-occupied facility is not the building owner, provide the lead pamphlet by either method below:
 - (i) Obtain a written acknowledgment that an adult representative received the pamphlet; or certify in writing that a pamphlet was delivered.
 - (ii) Obtain a certificate of mailing at least 7 days before the renovation.

2. Provide the parents or guardians of children using the child-occupied facility with information by either of these methods:

 - (a) Mail or hand-deliver the lead pamphlet and renovation information to each parent or guardian.
 - (b) Post signs describing the renovation. The signs must include the pamphlet or information on how to review a copy.

Sample Pre-Renovation Form

- Page 25 and 26
- Occupant confirmation / Owner-occupant opt-out acknowledgement
- Renovator's certification option for tenant-occupied dwellings only
- Renovation notice for tenants in renovations in common areas of multi-family housing
- Record of tenant notification procedures

Future Sample Pre-Renovation Form

This sample form may be used by firms to document compliance with the requirements of the Federal Lead-Based Paint Renovation, Repair, and Painting Program after April 2010.

Occupant Confirmation

Pamphlet Receipt

— I have received a copy of the lead hazard information pamphlet informing me of the potential risk of the lead hazard exposure from renovation activity to be performed in my dwelling unit. I received this pamphlet before the work began.

Owner-occupant Opt-out Acknowledgment

— (A) I confirm that I own and live in this property, that no child under the age of 6 resides here, that no pregnant woman resides here, and that this property is not a child-occupied facility.

Note: A child resides in the primary residence of his or her custodial parents, legal guardians, foster parents, or informal caretaker if the child lives and sleeps most of the time at the caretaker's residence.

Note: A child-occupied facility is a pre-1978 building visited regularly by the same child, under 6 years of age, on at least two different days within any week, for at least 3 hours each day, provided that the visits total at least 60 hours annually.

If Box A is checked, check either Box B or Box C, but not both.

— (B) I request that the renovation firm use the lead-safe work practices required by EPA's Lead-Based Paint Renovation, Repair, and Painting Rule; or
— (C) I understand that the firm performing the renovation will not be required to use the lead-safe work practices required by EPA's Lead-Based Paint Renovation, Repair, and Painting Rule.

Printed Name of Owner-occupant

Signature of Owner-occupant

Signature Date

Renovator's Self Certification Option (for tenant-occupied dwellings only)

Instructions to Renovator: If the lead hazard information pamphlet was delivered but a tenant signature was not obtainable, you may check the appropriate box below.

- **Declined** — I certify that I have made a good faith effort to deliver the lead hazard information pamphlet to the rental dwelling unit listed below at the date and time indicated and that the occupant declined to sign the confirmation of receipt. I further certify that I have left a copy of the pamphlet at the unit with the occupant.
- **Unavailable for signature** — I certify that I have made a good faith effort to deliver the lead hazard information pamphlet to the rental dwelling unit listed below and that the occupant was unavailable to sign the confirmation of receipt. I further certify that I have left a copy of the pamphlet at the unit by sliding it under the door or by (fill in how pamphlet was left).

Printed Name of Person Certifying Delivery

Attempted Delivery Date

Signature of Person Certifying Lead Pamphlet Delivery

Unit Address

Note Regarding Mailing Option — As an alternative to delivery in person, you may mail the lead hazard information pamphlet to the owner and/or tenant. Pamphlet must be mailed at least 7 days before renovation. Mailing must be documented by a certificate of mailing from the post office.

Sample Forms (continued)

Renovation Notice — For use in notifying tenants of renovations in common areas of multi-family housing.

The following renovation activities will take place in the following locations:

Activity (e.g., sanding, window replacement)

Location (e.g., lobby, recreation center)

The expected starting date is _____ and the expected ending date is _____. Because this is an older building built before 1978, some of the paint disturbed during the renovation may contain lead. You may obtain a copy of the pamphlet, *Protect Your Family From Lead in Your Home*, by telephoning me at _____. Please leave a message and be sure to include your name, phone number and address. I will either mail you a pamphlet or slide one under your door.

Date

Printed name of renovator

Signature of renovator

**Record of Tenant Notification Procedures — Procedures Used For Delivering Notices to Tenants of
Renovations in Common Areas**

Project Address: _____

Street (apt. #) _____

City _____ State _____ Zip Code _____

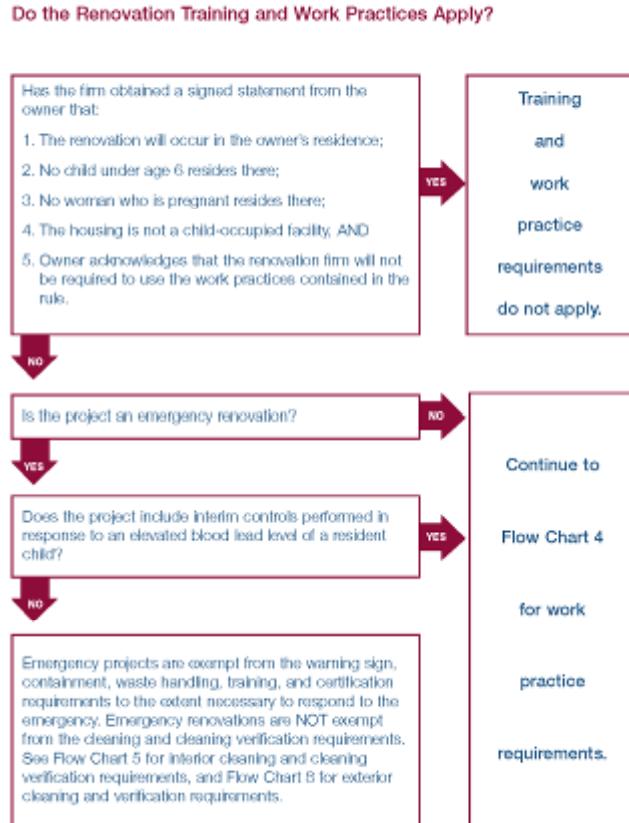
Owner of multi-family housing _____ Number of dwelling units _____

Method of delivering notice forms (e.g. *delivery to units, delivery to mailboxes of units*)

Name of person delivering notices _____

Signature of person delivering notices _____ Date of Delivery _____

If pre-renovation education requirements or it is an emergency renovation, you need determine whether the training and work practice requirements apply.



Do the Renovation Training and Work Practices Apply?

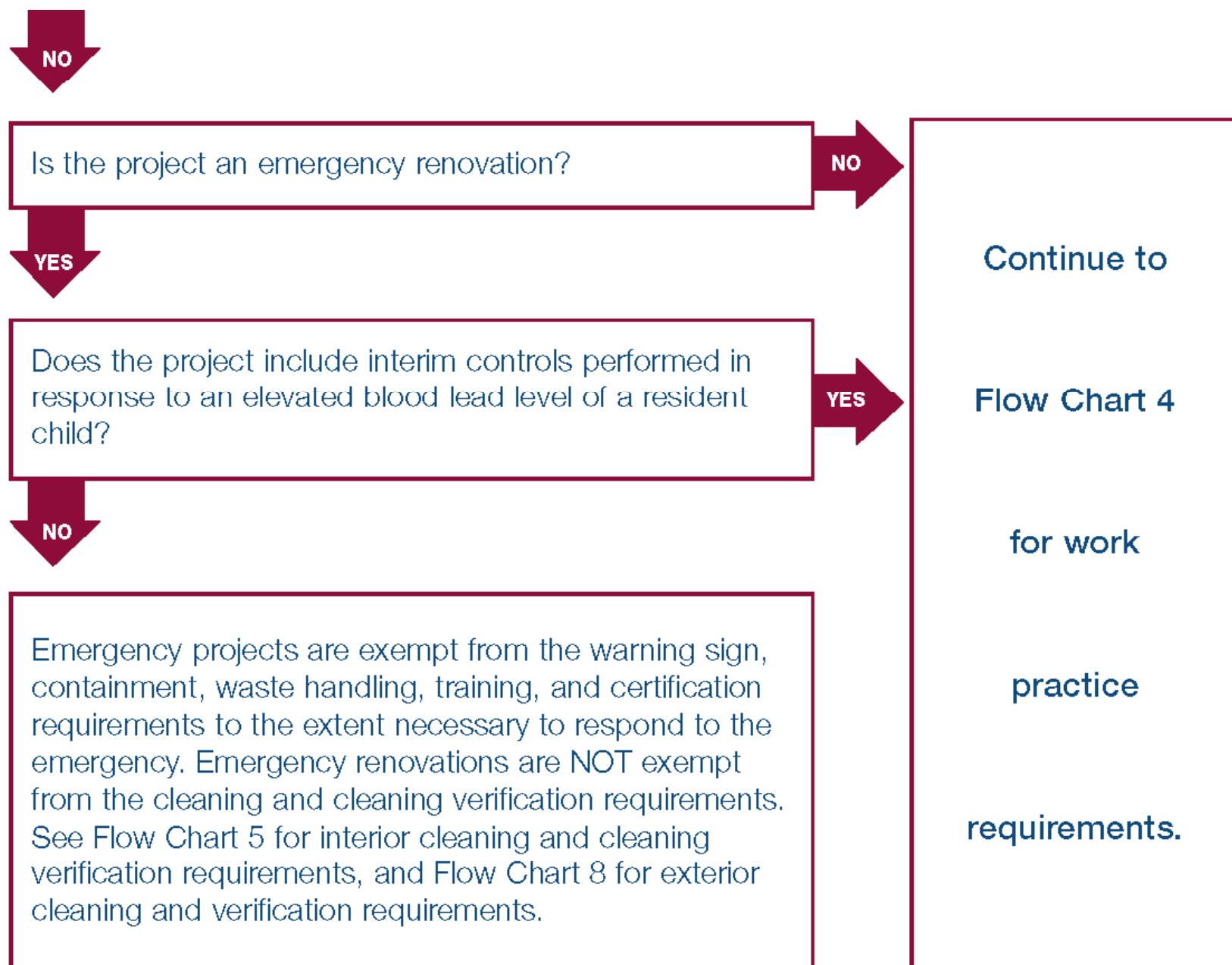
Has the firm obtained a signed statement from the owner that:

1. The renovation will occur in the owner's residence;
2. No child under age 6 resides there;
3. No woman who is pregnant resides there;
4. The housing is not a child-occupied facility, AND
5. Owner acknowledges that the renovation firm will not be required to use the work practices contained in the rule.

YES

Training
and
work
practice
requirements
do not apply.

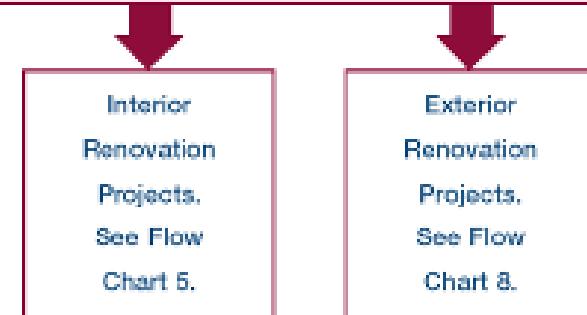
NO



Work Practice Requirements

General

- (A) Renovations must be performed by certified firms using certified renovators.
- (B) Firms must post signs clearly defining the work area and warning occupants and other persons not involved in renovation activities to remain outside of the work area. These signs should be in the language of the occupants.
- (C) Prior to the renovation, the firm must contain the work area so that no dust or debris leaves the work area while the renovation is being performed.
- (D) Work practices listed below are prohibited during a renovation:
 1. Open-flame burning or torching of lead-based paint;
 2. Use of machines that remove lead-based paint through high speed operation such as sanding, grinding, power planing, needle gun, abrasive blasting, or sandblasting, unless such machines are used with HEPA exhaust control; and
 3. Operating a heat gun on lead-based paint at temperatures of 1100 degrees Fahrenheit or higher.
- (E) Waste from renovations:
 1. Waste from renovation activities must be contained to prevent releases of dust and debris before the waste is removed from the work area for storage or disposal.
 2. At the conclusion of each work day and at the conclusion of the renovation, waste that has been collected from renovation activities must be stored to prevent access to and the release of dust and debris.
 3. Waste transported from renovation activities must be contained to prevent release of dust and debris.



Work Practice Requirements for All Projects

- Define the Work Area
- Post Signs
- Prohibit Specific Work Practices
- Waste Handling

Work Practice Requirements Specific to Interior Renovations

The firm must:

- (A) Remove all objects from the work area or cover them with plastic sheeting with all seams and edges sealed.
- (B) Close and cover all ducts opening in the work area with taped-down plastic sheeting.
- (C) Close windows and doors in the work area. Doors must be covered with plastic sheeting.
- (D) Cover the floor surface with taped-down plastic sheeting in the work area a minimum of six feet beyond the perimeter of surfaces undergoing renovation or a sufficient distance to contain the dust, whichever is greater.
- (E) Use precautions to ensure that all personnel, tools, and other items, including the exteriors of containers of waste, are free of dust and debris when leaving the work area.
- (F) After the renovation has been completed, the firm must clean the work area until no dust, debris or residue remains. The firm must:
 1. Collect all paint chips and debris, and seal it in a heavy-duty bag.
 2. Remove and dispose of protective sheeting as waste.
 3. Clean all objects and surfaces in the work area and within two feet of the work area in the following manner:
 - a. Clean walls starting at the ceiling and working down to the floor by either vacuuming with a HEPA vacuum or wiping with a damp cloth.
 - b. Thoroughly vacuum all remaining surfaces and objects in the work area, including furniture and fixtures, with a HEPA vacuum.
 - c. Wipe all remaining surfaces and objects in the work area, except for carpeted or upholstered surfaces, with a damp cloth. Mop uncarpeted floors thoroughly using a mopping method that keeps the wash water separate from the rinse water, or using a wet mopping system.



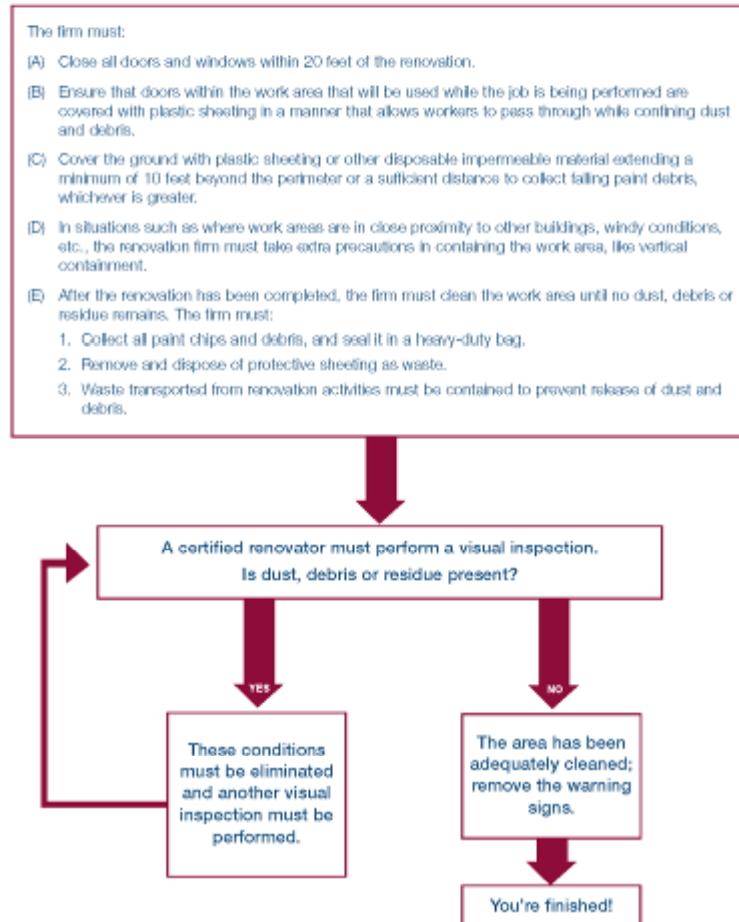
Cleaning verification is required to ensure the work area is adequately cleaned and ready for re-occupancy. See Flow Chart 6 for instructions on performing cleaning verification for interior projects.

Interior Renovations

- Remove or cover objects
- Close and cover ducts
- Close windows & doors.
- Cover access doors
- Cover floor to 6' beyond area
- Clean-up people and tools when leaving area
- When complete clean work area
 - Top down
 - Vacuum or wipe
 - Final wipe – 2 bucket

No dust, debris or residue can remain

Work Practice Requirements Specific to Exterior Renovations



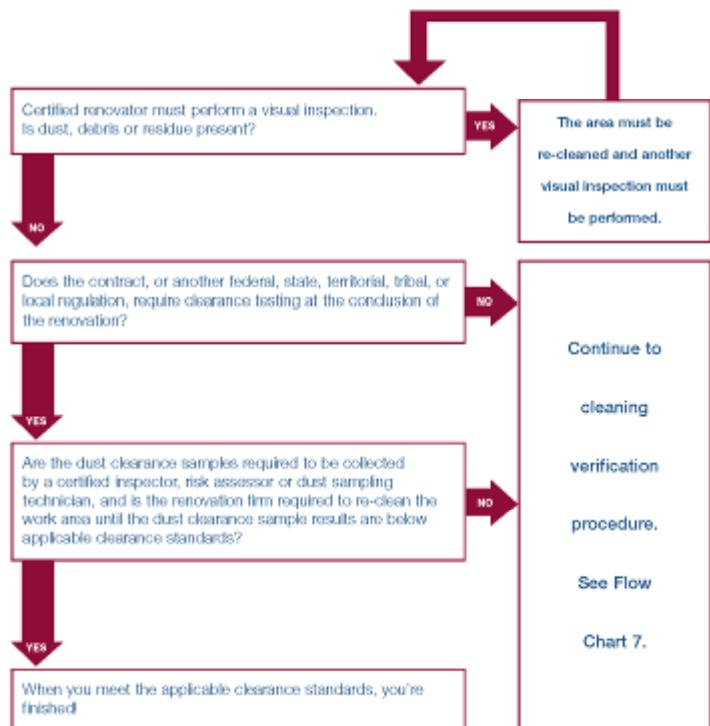
Exterior Renovations

- Close windows and doors within 20'
- Cover access to work areas with plastic sheeting
- Cover ground at least 10' to catch debris
- Manage tight spaces
- Clean so no dust, debris or residue remains

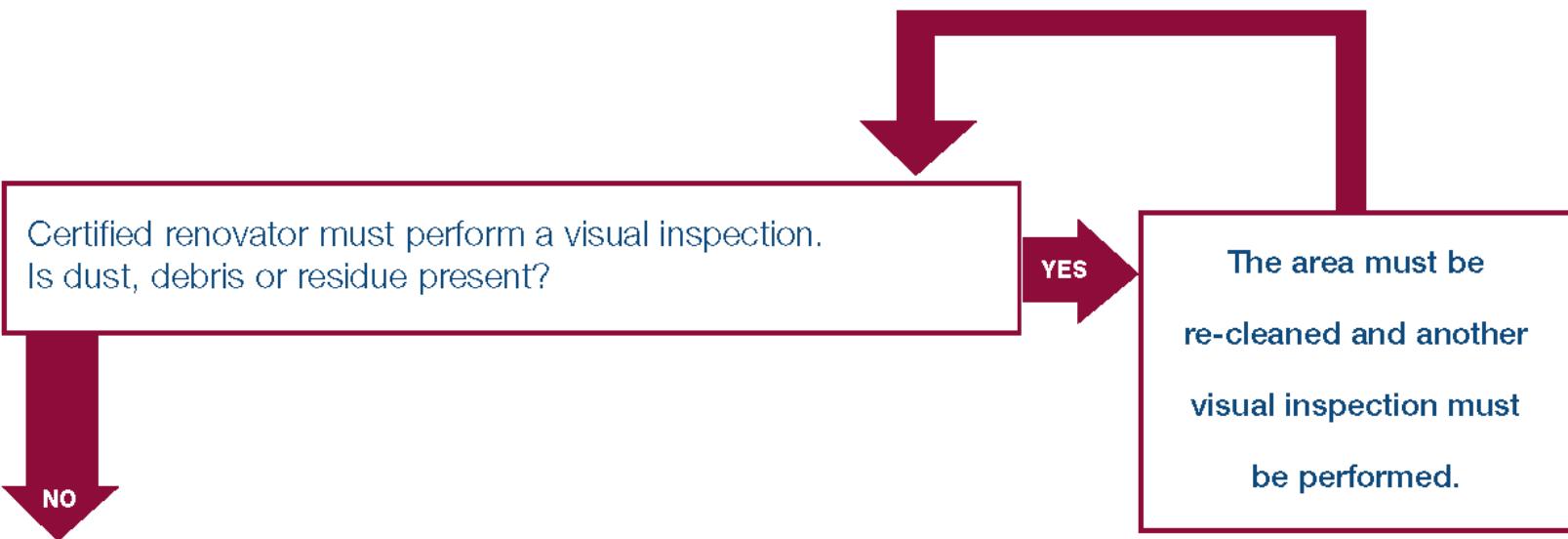
No dust, debris or residue can remain

What is dust clearance?

Interior Cleaning Verification: Visual Inspection and Optional Clearance Testing



Know if your work is covered by the HUD Lead-Safe Housing Rule



Does the contract, or another federal, state, territorial, tribal, or local regulation, require clearance testing at the conclusion of the renovation?

YES

Are the dust clearance samples required to be collected by a certified inspector, risk assessor or dust sampling technician, and is the renovation firm required to re-clean the work area until the dust clearance sample results are below applicable clearance standards?

YES

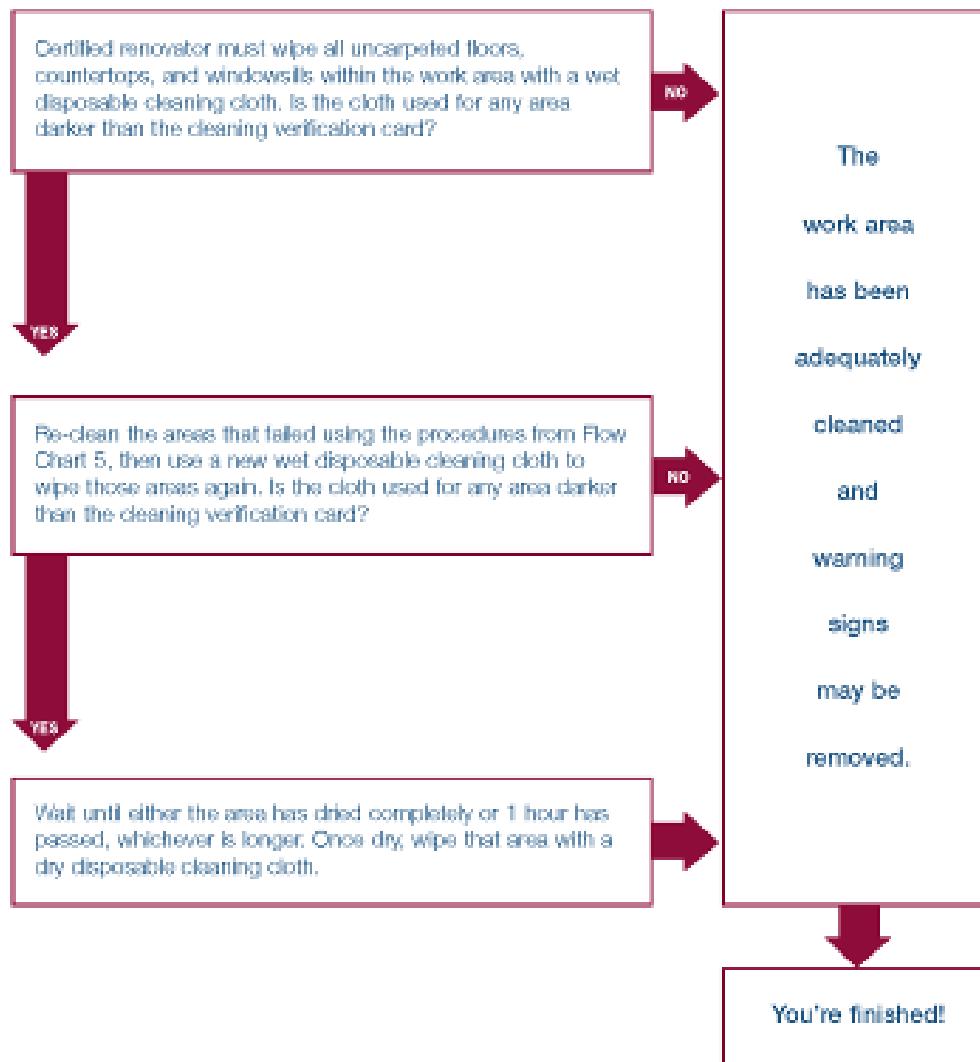
When you meet the applicable clearance standards, you're finished!

NO

Continue to
cleaning
verification
procedure.
See Flow
Chart 7.

Interior Cleaning Verification: Floors, Countertops, and Window Sills

Note: For areas greater than 40 square feet, separate the area into sections and use a new disposable cleaning cloth for each section.



Cleaning Verification

- No delegation!
- Wet wipe & compare
- If fail, wet wipe and compare
- If fail, wait 1 hour, dry wipe and you're finished – no final comparison.

How Is My Compliance Determined, and What Happens if the Agency Discovers a Violation?

To maximize compliance, EPA implements a balanced program of compliance assistance, compliance incentives, and traditional law enforcement. EPA knows that small businesses that must comply with complicated new statutes or rules often want to do the right thing, but may lack the requisite knowledge, resources, or skills. Compliance assistance information and technical advice helps small businesses to understand and meet their environmental obligations. Compliance incentives, such as EPA's Small Business Policy, apply to businesses with 100 or fewer employees and encourage persons to voluntarily discover, disclose, and correct violations before they are identified by the government (more information about EPA's Small Business Policy is available at www.epa.gov/compliance/incentives/smallbusiness/index.html). EPA's enforcement program is aimed at protecting the public by targeting persons or entities who neither comply nor cooperate to address their legal obligations.

EPA uses a variety of methods to determine whether businesses are complying, including inspecting work sites, reviewing records and reports, and responding to citizen tips and complaints. Under TSCA, EPA (or a state, if this program has been delegated to it) may file an enforcement action against violators seeking penalties of up to \$32,500 per violation, per day. The proposed penalty in a given case will depend on many factors, including the number, length, and severity of the violations, the economic benefit obtained by the violator, and its ability to pay. EPA has policies in place to ensure penalties are calculated fairly. These policies are available to the public. In addition, any company charged with a violation has the right to contest EPA's allegations and proposed penalty before an impartial judge or jury.

EPA encourages small businesses to work with the Agency to discover, disclose, and correct violations. The Agency has developed self-disclosure, small business, and small community policies to modify penalties for small and large entities that cooperate with EPA to address compliance problems. In addition, EPA has established compliance assistance centers to serve over one million small businesses (see Construction Industry Compliance Assistance Center for information regarding this rule at www.cicacenter.org). For more information on compliance assistance and other EPA programs for small businesses, please contact EPA's Small Business Ombudsman at 202-566-2075.

- Up to \$32,500 per violation per day
- Voluntary disclosure and reporting for businesses with fewer than 100 employees
- Citizen – clients, neighbors and others can file citizen suit to enforce law when EPA or state does not
- Ombudsman – 202-566-2075

Frequent Questions

What is the legal status of this guide?

This guide was prepared pursuant to section 212 of SBREFA. EPA has tried to help explain in this guide what you must do to comply with the Toxic Substances Control Act (TSCA) and EPA's lead regulations. However, this guide has no legal effect and does not create any legal rights. Compliance with the procedures described in this guide does not establish compliance with the rule or establish a presumption or inference of compliance. The legal requirements that apply to renovation work are governed by EPA's 2008 Lead Rule, which controls if there is any inconsistency between the rule and the information in this guide.

Is painting considered renovation if no surface preparation activity occurs?

No. If the surface to be painted is not disturbed by sanding, scraping, or other activities that may cause dust, the work is not considered renovation and EPA's lead program requirements do not apply. However, painting projects that involve surface preparation that disturbs paint, such as sanding and scraping, would be covered.

What if I renovate my own home?

EPA's lead program rules apply only to renovations performed for compensation; therefore, if you work on your own home, the rules do not apply. EPA encourages homeowners to use lead-safe work practices, nonetheless, in order to protect themselves, their families, and the value of their homes.

Is a renovation performed by a landlord or employees of a property management firm considered a compensated renovation under EPA's lead program rules?

Yes. The receipt of rent payments or salaries derived from rent payments is considered compensation under EPA's lead program. Therefore, renovation activities performed by landlords or employees of landlords are covered.

Do I have to give out the lead pamphlet seven days prior to beginning renovation activities?

The 7-day advance delivery requirement applies only when you deliver the lead pamphlet by mail; otherwise, you may deliver the pamphlet anytime before the renovation begins so long as the renovation begins within 60 days of the date that the pamphlet is delivered. For example, if your renovation is to begin May 30, you may deliver the pamphlet in person anytime between April 1 and start of the project on May 30, or you may deliver the pamphlet by mail anytime between April 1 and May 23.

Tips for Easy Compliance

1. For your convenience the sample forms on pages 23 and 25 of this handbook are included in the *Renovate Right* pamphlet (see page 31 for information on how to get copies). Attach the forms to the back of your customer renovation or repair contracts. The completed forms can be filed along with your regular paperwork.
2. Plan ahead to obtain enough copies of the lead pamphlet (see page 31 for information on how to get copies of the pamphlet).

- Follow rule not guide
- Existing surface must be disturbed.
- Do-it-yourselfers not covered – no compensation.
- Property managers covered.
- 0 to 60 days for education
- Attach forms to contracts
- Order *Renovate Right*

Where Can I Get More Information?

Further information is available from the National Lead Information Center (800-424-LEAD) and on the Internet at www.epa.gov/lead. Available resources include:

- Full text version of the Lead-Based Paint Renovation, Repair, and Painting Program regulation.
- Interpretive guidance which provides more detailed information on the rule's requirements.
- A downloadable version of the lead pamphlet.

Why Is Lead Paint Dangerous?

Lead gets into the body when it is swallowed or inhaled. People, especially children, can swallow lead dust as they eat, play, and do other normal hand-to-mouth activities. People may also breathe in lead dust or fumes if they disturb lead-based paint. People who sand, scrape, burn, brush, blast or otherwise disturb lead-based paint risk unsafe exposure to lead.

Lead is especially dangerous to children under 6 years of age.



Lead can affect children's brains and developing nervous systems, causing:

- Reduced IQ and learning disabilities.
- Behavioral problems.

Even children who appear healthy can have dangerous levels of lead in their bodies.

Lead is also harmful to adults. In adults, low levels of lead can pose many dangers, including:

- High blood pressure and hypertension.
- Pregnant women exposed to lead can transfer lead to their fetus.



For more information

- 800-424-LEAD
- www.epa.gov/lead

Dangers of lead

- Children under 6 years old
 - Reduced IQ
 - Learning disabilities
 - Behavioral problems
- Adults
 - High blood pressure and hypertension
 - Pregnant women

Other Resources

For additional information on how to protect yourself and your customers from lead paint hazards, visit www.epa.gov/lead or call the National Lead Information Center at 1-800-424-LEAD (5323). Available documents include:

- *Renovate Right: Important Lead Hazard Information for Families, Child Care Providers and Schools*
- *Joint EPA-HUD Curriculum: Lead Safety for Remodeling, Repair, and Painting*
- *Lead Paint Safety: A Field Guide for Painting, Home Maintenance, and Renovation Work*
- *Testing Your Home for Lead in Paint, Dust, and Soil*
- *Fight Lead Poisoning with a Healthy Diet*
- *Protect Your Family From Lead in Your Home*
- *Lead in Your Home: A Parent's Reference Guide*



www.epa.gov/lead

www.hud.gov/lead

www.cdc.gov/lead

www.nchh.org/rrp

www.afhh.org

Key Terms

Certificate of Mailing — A written verification from the Postal Service that you mailed the lead pamphlet to an owner or a tenant. This is less expensive than certified mail, which is also acceptable for meeting the Lead-Based Paint Renovation, Repair, and Painting Program requirements. (Note: If using this delivery option, you must mail the pamphlet at least seven days prior to the start of renovation.)

Certified Inspector or Risk Assessor — An individual who has been trained and is certified by EPA or an authorized state or Indian Tribe to conduct lead-based paint inspections or risk assessments.

Child-occupied Facility — May include, but is not limited to, day care centers, pre-schools and kindergarten classrooms. Child-occupied facilities may be located in target housing or in public or commercial buildings. The regulation defines a "child-occupied facility" as a building, or portion of a building, constructed prior to 1978, visited regularly by the same child, under 6 years of age, on at least two different days within any week (Sunday through Saturday period), provided that each day's visit lasts at least three hours and the combined weekly visits last at least six hours, and the combined annual visits last at least 60 hours.

Cleaning Verification Card — a card developed and distributed, or otherwise approved, by EPA for the purpose of determining, through comparison of wet and dry disposable cleaning cloths with the card, whether post-renovation cleaning has been properly completed.

Common Area — A portion of a building that is generally accessible to all residents or users. Common areas include (but are not limited to) hallways, stairways, laundry rooms, recreational rooms, playgrounds, community centers, and fenced areas. The term applies to both interiors and exteriors of the building. (Note: Lead-Based Paint Renovation, Repair, and Painting Program requirements related to common areas apply only to multi-family housing.)

Component — A specific design or structural element or fixture distinguished by its form, function, and location. A component can be located inside or outside the dwelling.

Examples

Interior
Ceilings
Crown molding
Walls
Doors and trim
Floors
Fireplaces
Radiators
Shelves
Stair treads
Windows and trim
Built-in cabinets
Beams
Bathroom vanities
Counter tops
Air conditioners



Exterior
Painted roofing
Chimneys
Flashing
Gutters and downspouts
Ceilings
Soffits
Doors and trim
Fences
Floors
Joists
Handrails
Window sills and sashes
Air conditioners



- Certificate of mailing v. certified mail
- Renovator v. Inspector v. Risk Assessor
- Child-Occupied Facility
 - Same child
 - 3 hours per day
 - 2 visit per week
 - 60 hours per year

Confirmation of Receipt of Lead Hazard Information Pamphlet — A form that is signed by the owner or tenant of the housing confirming that they received a copy of the lead pamphlet before the renovation began. (See sample on page 23.)

Emergency Renovation — Unplanned renovation activities done in response to a sudden, unexpected event which, if not immediately attended to, presents a safety or public health hazard or threatens property with significant damage.

Examples

- Renovation to repair damage from a tree that fell on a house.
- Renovation to repair a burst water pipe in an apartment complex.
- Interim controls performed in response to an elevated blood lead level in a resident child.

Firm — A company, partnership, corporation, sole proprietorship or individual doing business, association, or other business entity; a Federal, State, Tribal, or local government agency; or a nonprofit organization.

General Contractor — One who contracts for the construction of an entire building or project, rather than for a portion of the work. The general contractor hires subcontractors (e.g. plumbing, electrical, etc.), coordinates all work, and is responsible for payment to subcontractors.

Housing for the Elderly — Retirement communities or similar types of housing specifically reserved for households of one or more persons 62 years of age or older at the time the unit is first occupied.

Interim Controls — Interim controls means a set of measures designed to temporarily reduce human exposure or likely exposure to lead-based paint hazards, including specialized cleaning, repairs, maintenance, painting, temporary containment, ongoing monitoring of lead-based paint hazards or potential hazards, and the establishment and operation of management and resident education programs.

Lead Abatement — Work designed to permanently eliminate lead-based paint hazards. If you are hired to do lead-abatement work only, the Lead-Based Paint Renovation, Repair, and Painting Program does not apply. Abatement does not include renovation, remodeling, or other activities done to repair, restore, or redesign a given building — even if such renovation activities incidentally eliminate lead-based paint hazards. (Note: Some states define this term differently than described above. Consult your state officials if you are not sure how "lead abatement" is defined in your state.)

Lead Pamphlet — Beginning in December 2008, the lead hazard information pamphlet for the purpose of pre-renovation education will be *Renovate Right: Important Lead Hazard Information for Families, Child Care Facilities and Schools*, or an EPA-approved alternative pamphlet. Until that time either the *Renovate Right: Protect Your Family from Lead in Your Home*, or an EPA-approved alternative pamphlet may be used for the purpose of pre-renovation education. (See page 31 for information on obtaining copies.)

- **Emergency renovation** – not exempt from cleaning and cleaning verification
- **Abatement** – work designed to permanently eliminate lead-based paint hazards.

Minor Repair and Maintenance — Activities that disrupt 6 square feet or less of painted surface per room for interior activities or 20 square feet or less of painted surface for exterior activities where none of the prohibited work practices is used and where the work does not involve window replacement or demolition of painted surface areas. When removing painted components, or portions of painted components, the entire surface area removed is the amount of painted surface disturbed. Jobs, other than emergency renovations, performed in the same room within the same 30 days must be considered the same job for the purpose of determining whether the job is a minor repair and maintenance activity.

Owner — Any person or entity that has legal title to housing, including individuals, partnerships, corporations, government agencies, Indian Tribes, and nonprofit organizations.

Prohibited Practices — Work practices listed below are prohibited during a renovation:

- Open-flame burning or torching of lead-based paint;
- Use of machines that remove lead-based paint through high speed operation such as sanding, grinding, power planing, needle gun, abrasive blasting, or sandblasting, unless such machines are used with HEPA exhaust control; and
- Operating a heat gun on lead-based paint at temperatures above 1100 degrees Fahrenheit.

Record of Notification — A written statement documenting the steps taken to notify occupants of renovation activities in common areas of multi-family housing. (See page 27 for sample.)

Renovation — Modification of all or part of any existing structure that disturbs a painted surface, except for some specifically exempted activities (e.g., minor repair and maintenance). Includes:

- Removal/modification of painted surfaces, components, or structures
- Surface preparation activities (sanding/scraping/other activities that may create paint dust)
- Window replacement

Examples

1. Demolition of painted walls or ceilings
2. Replastering
3. Plumbing repairs or improvements
4. Any other activities which disturb painted surfaces

Renovation Notice — Notice to tenants of renovations in common areas of multi-family housing. (See sample form on page 27.) Notice must describe nature, location, and expected timing of renovation activity; and must explain how the lead pamphlet may be obtained free of charge.

Renovator — A person who either performs or directs workers who perform renovation. A certified renovator is a renovator who has successfully completed a renovator course accredited by EPA or an EPA authorized State or Tribal program. (Note: Because the term "renovation" is defined broadly by the Lead-Based Paint Renovation, Repair, and Painting Program, many contractors who are not generally considered "renovators", as that term is commonly used, are considered to be "renovators" under the program and must follow the rule's requirements.)

- Minor repair and maintenance – not window replacement or demolition
- Prohibited practices
- Renovation – disturbs a painted surface but not minor repair or maintenance

Self-Certification of Delivery — An alternative method of documenting delivery of the lead hazard information pamphlet to a tenant. This method may be used whenever the tenant is unavailable or unwilling to sign a confirmation of receipt of lead pamphlet. (See sample form on page 23.) (Note: This method is not a permissible substitute for delivery of the lead pamphlet to an owner.)

Supplemental Renovation Notice — additional notification that is required when the scope, location, or timing of project changes.

Zero-Bedroom Dwelling — Any residential dwelling where the living area is not separated from the sleeping area. This term includes efficiency and studio apartments, dormitory housing, and military barracks.



- Self-certification of delivery – when tenant unable or unwilling to sign confirmation of receipt
- Revising renovation notice – scope, location or timing changes

Where Can I Get Copies of the Lead Pamphlet?

For single copies, in Spanish or English, of *Renovate Right: Important Lead Hazard Information for Families, Child Care Facilities and Schools* (EPA740-F-08-002), or *Protect Your Family from Lead in Your Home* (EPA-747-K-99-001) (in Spanish or English), call the National Lead Information Center (NLIC) at 1-800-424-LEAD. For any orders, be sure to use the appropriate stock reference number listed above.

There are four ways to get multiple copies:

1. Call the Government Printing Office order desk at (202) 512-1800.
2. Send fax requests to (202) 512-2233.
3. Request copies in writing from: Superintendent of Documents P.O. Box 371954 Pittsburgh, PA 15250-7964
4. Obtain copies via the Internet at www.epa.gov/lead/pubs/brochure.htm

Single copies are available at no charge. Multiple copies available for a fee in packs of 50.

The pamphlet may be photocopied for distribution as long as the text and graphics are readable.



- Single copies are free
- Fee for packs of 50
- Copying OK if text and graphics are readable

Paperwork Reduction Act Notice: The incremental public burden for the collection of information contained in the Lead Renovation, Painting and Repair Program, which are approved under OMB Control No. 2070-0155 and identified under EPA ICR No. 1715, is estimated to average approximately 54 hours per year for training providers. For firms engaged in regulated renovation, repair, and painting activities, the average incremental burden is estimated to be about 6.5 hours per year. Comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden, may be sent to: Director, Collection Strategies Division, Office of Environmental Information, U.S. Environmental Protection Agency (Mail Code 2822T), 1200 Pennsylvania Avenue, N.W., Washington, D.C. 20460. Include the OMB number identified above in any correspondence. Do not send any completed forms to this address. The actual information or form(s) should be submitted in accordance with the instructions accompanying the form(s), or as specified in the corresponding regulations.

The End!