

Landlords – What you need to know about making your properties lead-safe:

Lead-Safe Renovation vs. Lead Paint Abatement: It's all about *intent*.

Either way you must work lead-safe!

If you were to make this home “lead-safe” you would install new vinyl siding, wrap all exterior trim in aluminum coil stock, replace all of the windows, and replace all of the doors. Inside, you would re-paint, replace, or drywall over all components with old deteriorating paint.

But did you just do renovation or abatement?

It is question of your *intent*.

Abatement:

If you had a Lead Inspection/Risk Assessment completed on the home to identify all lead-based paint hazards, and your repairs are intentionally addressing those hazards, then you are doing *abatement*. You must use a certified lead-abatement contractor whose workers are all certified lead abatement workers. A Lead Inspector/Risk Assessor must then perform a lead clearance to confirm that all hazards were addressed, and that no visual debris or dust hazards remain. All work must be done lead-safe in compliance with all abatement regulations.

Painting is an *interim control* (temporary fix), and not an abatement method. Abatement is defined as replacement, enclosure, or encapsulation that addresses an identified lead-based paint hazard for at least 20 years. Interim controls are often used in conjunction with abatement, but are not themselves abatement.

Renovation:

If you do not yet have a Lead Inspection/Risk Assessment report, and you install vinyl siding, replace all old windows and doors, and address all deteriorated paint because you *want to*, you are doing renovation. On pre-1978 built housing, companies must work lead-safe. Any company or landlord working with paint on pre-1978 housing must be a Lead-Safe Certified Firm under the EPA's [Renovation, Repair, and Painting \(RRP\)](#) rule. Their applicable workers must be individually RRP certified as well. This means that workers and their employers should know how to work lead-safe. All work must be done lead-safe in compliance with all EPA RRP rule requirements.

A Landlord is a company

A landlord must be an RRP-certified firm to legally work with paint on pre-1978 housing they own, as do any contractors they hire to work with paint. Handymen and superintendents must be individually RRP-certified and their employers must be RRP-certified firms to work with old paint.

Get RRP-Certified!

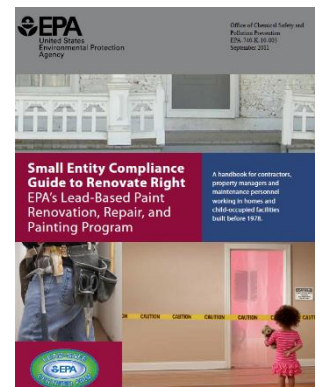
Any landlord or landlord-employed handyman planning to work with old paint must be RRP-certified.

Go to: <https://www.epa.gov/lead/lead-renovation-repair-and-painting-program>

See: <https://www.epa.gov/sites/production/files/documents/sbcomplianceguide.pdf>



Assume all old paint is lead-based.



What Does Lead-Safe Look Like?

- **Have your identification.** Any company should be able to show their accreditation (abatement, RRP, or both). Individual workers are also given certification ID cards.
- **Give them something:** Prior to abatement, tenants must receive the [Protect Your Family From Lead In Your Home](#) brochure. Prior to renovation, tenants must receive the [Renovate Right](#) brochure. Companies must keep a signed receipt for three years.
- **Where are they?** No one other than the workers should be allowed near the work area.
- **Define the work area:** Signs and caution tape should be posted defining the work area. For abatement, this is usually the whole property.
- **Plastic, plastic, plastic:** Use thick (6-mil) plastic sheeting on the floor of the work area, the pathway leading there, and over the doorway of the work area. For abatement, this is usually the whole house. 6-mil poly should be secured with tape, and cover all HVAC vents. If weather permits, the HVAC system should be turned off.
- **Work wet:** Workers should mist surfaces with water prior to scraping to prep for painting. Workers should mist dust and debris on plastic sheeting to keep dust down.
- **No debris:** No painted objects (e.g. old windows) should ever be off plastic sheeting and just on the ground. All debris must be wrapped in plastic sheeting and/or the dumpster must be lined with 6-mil poly.
- **HEPA Vac:** Only certified RRP-compliant commercial HEPA vacs can be used when working with old paint. Do not use “shop” vacs.
- **Clean, Clean, Clean:** working lead-safe means working clean. Following work, the contractor must safely dispose of all materials in sealed 6-mil poly or goose-necked contractor-grade garbage bags. They must then HEPA vac and wet clean the work area (mop with disposable wet cleaning products) to remove all visual dust and debris.
 - For abatement, the lead-specific clean must result in a passed lead clearance. For renovation, use a Cleaning Verification Card to ensure the lead-specific clean leaves the work area cleaner than before work began. There must be no visual dust or debris.



Lead abatement prep with caution tape and plastic sheeting.



Lead-safe renovation prep with caution tape and plastic sheeting.

What about my tenants?

The best time to renovate or abate lead-safe may be between leases when the property is vacant.

What if I see non-lead-safe work practices?

If you see a company working with old paint and not working lead-safe, call MDHHS at 517-335-9390. Try to get the company's name and any vehicle identification numbers. Do not approach the work site or the company.

Disclaimer: This flyer does not certify you to do anything in any way.