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
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.

**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.*

July 2019