

**NC Department of Health and Human Services  
Division of Public Health**

**Health Hazards Control Unit  
(HHCU)**



**NC Lead-Based Paint  
Hazard Management Programs  
(LHMP and LHMP-RRP)**

Industrial Hygiene Consultant  
Don Chaney 919-707-5974

# What will we be talking about?

- **NC Regulatory Applicability Lead-Based Paint**
- **Health Effects / Background**
- **Lead-Based Paint Abatement vs. Renovation**
- **LHMP-RRP (Renovation) Certification, Work Practices & Recordkeeping**

# What is Lead-Based Paint (LBP) as it applies to the LHMP/LHMP-RRP?

**EPA & State definition: Paint or other surface coatings that contain lead equal to or in excess of 1.0 milligram per square centimeter (mg/cm<sup>2</sup>) or more than 0.5% by weight (5,000 ppm)**

**Note: Not the same as OSHA – OSHA says any level of lead – worker protection requirements per the standard**

# Background Stuff



- **Lead Paint industry adopted voluntary standard for residential paint (1955) – 1.0% (10,000 ppm)- Adopted by Congress, part of LBPPPA -1971**
- **Residential Paint – revised downward to 0.06% (600 ppm) lead-1978**
- **U.S. Consumer Product Safety Commission (Aug 14, 2009) – Ban of Lead-Containing Paint & Certain Consumer Products (mainly items used by children, toys, some furniture) – changed lead-containing paint – from 0.06% (600 ppm) to 0.009% (90 ppm) - *Household paint must also meet this requirement.***
- **CDC-Jan 2012 - LOC changed from 10 µg/dL to lower “Blood Lead Reference Value” of 5 µg/dL**

# Why is lead-based paint a problem?

## Older Homes are More Likely to Contain Lead-Based Paint

Year Home Was Built



### Percentage of Homes Containing Lead-Based Paint

Source: American Healthy Homes Survey: Draft Final Report for Peer Review: Lead and Arsenic Findings. October 7, 2008.

# Regulatory Overview

- **TSCA –Title X – Residential Lead-Based Paint Hazard Reduction Act of 1992**
  - (EPA) 40 CFR Part 745 – Lead-Based Paint Poisoning Prevention in Certain Residential Structures
    - **Subparts**
      - ❖ **D - Lead-Based Paint Hazards (2000)**
      - ❖ **E - Residential Property Renovation (1998)(2008)**
      - ❖ **F - Disclosure of known LBP and/or LPB Hazards Upon Sale or Lease of Residential Property (1996)**
      - ❖ **L - Lead-Based Paint Activities (inspections, abatement, risk assessment, project design)(1996)**
      - ❖ **Q - State and Indian Tribal Programs(1996)**

# Other Lead Rules

**OSHA (29 CFR 1926.62)**

**Lead in Construction –  
1992**

**Worker Protection**

**HUD (24 CFR Part 35)**

**Lead-Safe Housing  
Rule – 1999**

**Federally Owned  
Housing & Housing  
Receiving Federal  
Assistance**

**EPA/HUD Lead Disclosure Rule**

**(40 CFR Part 745 Subpart F) – 1996**

**Sale or Lease of Residential Property**

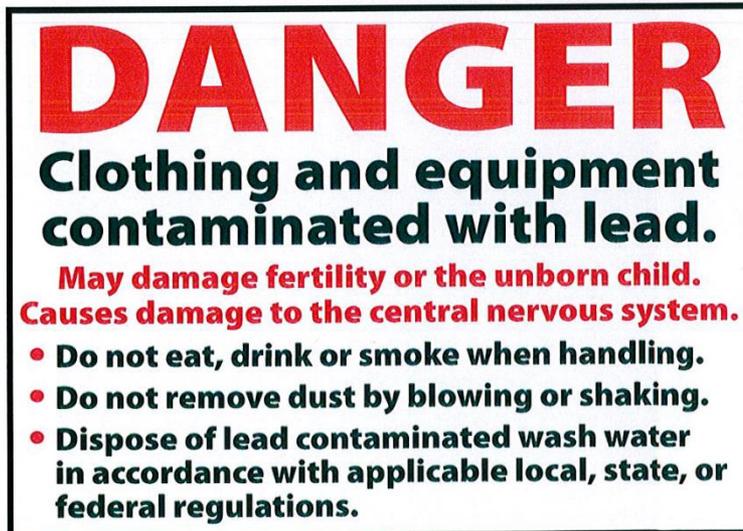
# OSHA 29 CFR 1926.62 – Labels as of June 1, 2015

## 1926.62(g)(2)(vii)(A)

The employer shall ensure that the containers of contaminated protective clothing and equipment required by paragraph (g)(2)(v) of this section are labeled as follows:

DANGER: CLOTHING AND EQUIPMENT CONTAMINATED WITH LEAD. MAY DAMAGE FERTILITY OR THE UNBORN CHILD. CAUSES DAMAGE TO THE CENTRAL NERVOUS SYSTEM. DO NOT EAT, DRINK OR SMOKE WHEN HANDLING. DO NOT REMOVE DUST BY BLOWING OR SHAKING. DISPOSE OF LEAD CONTAMINATED WASH WATER IN ACCORDANCE WITH APPLICABLE LOCAL, STATE, OR FEDERAL REGULATIONS.

New Label



Old Label



# OSHA 29 CFR 1926.62 – Signs as of June 1, 2016

## 1926.62(m)(1)(i)

The employer shall post the following warning signs in each work area where an employee's exposure to lead is above the PEL.

**DANGER**

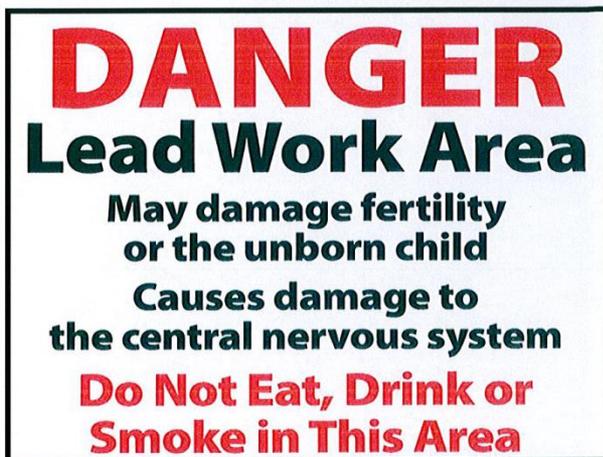
**LEAD WORK AREA**

**MAY DAMAGE FERTILITY OR THE UNBORN CHILD**

**CAUSES DAMAGE TO THE CENTRAL NERVOUS SYSTEM**

**DO NOT EAT, DRINK OR SMOKE IN THIS AREA**

### New Sign



### Old Sign – can use until May 31, 2016



# Target Housing

- **Target housing – Any housing constructed prior to 1978,**
  - **except housing for the elderly or persons with disabilities, unless one or more children age 6 years or under resides or is expected to reside in such housing for the elderly or persons with disabilities, or any zero-bedroom dwelling.**
- **A zero-bedroom dwelling is any residential dwelling in which the living areas are not separated from the sleeping area.**
  - **The term includes efficiencies, studio apartments, dormitory housing, military barracks, and rentals of individual rooms in residential dwellings.**

# Single Family Dwelling



3/31/2016

# Multi-Family Dwellings



# Child-Occupied Facility (COF)

- 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.
- Child-occupied facilities may include, but are not limited to, day care centers, preschools, and kindergarten classrooms.
- Child-occupied facilities (COF) may be located in target housing or in public or commercial buildings. With respect to common areas in public or commercial buildings, the COF encompasses those common areas, both interior and exterior, routinely used by children under age 6

# Applicable NC Regulations

- **Abatement Activities (1998)**
  - **Lead-Based Paint Hazard Management Program**
    - Article 19A, N.C. Gen. Stat. § 130A-453.01 – 453.11
    - 10A NCAC 41C .0800
- **Renovation, Repair and Painting Activities (2010)**
  - **Lead-Based Paint Hazard Management Program for Renovation, Repair and Painting**
    - Article 19B, N.C. Gen. Stat. § 130A-453.22 – 453.31
    - 10A NCAC 41C .0900

# Managing Lead-Based Paint Using Specified Work Practices

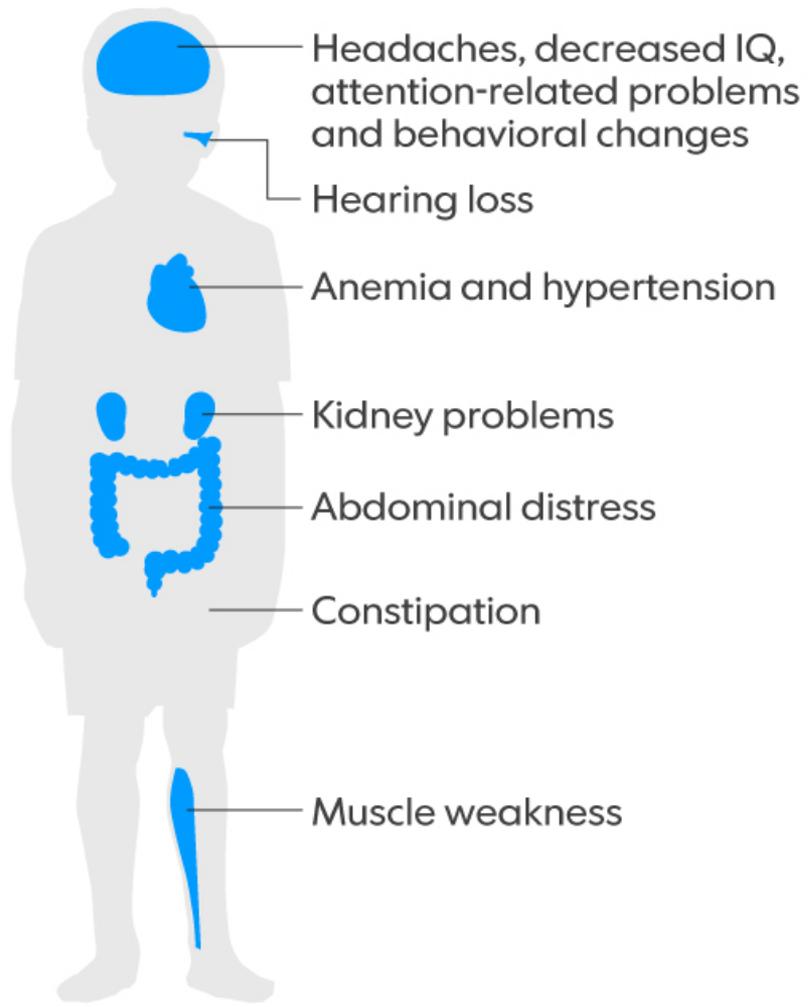


# Prevent creating LBP Hazards (site contamination)



# EFFECTS OF LEAD ON CHILDREN

People ingest low levels of lead daily. Adults absorb relatively small amounts compared to that of children. Some of the health effects associated with lead exposure in children:



SOURCES: National Institutes of Health, Mayo Clinic  
Frank Pompa, USA TODAY



# HOW LEAD HARMS CHILDREN

There is no safe level of lead in a child's body. Studies continue to document significant harms at lower and lower levels.

## Blood-lead levels<sup>1</sup> and their impact:

- 70+**  
Severe neurological problems, including seizures, coma and even death.
- 45+**  
Chelation therapy recommended with medication that causes lead to be excreted in the urine.
- Less than 10**  
Delayed puberty, decreased IQ, decreased hearing
- 5**  
Action level set by CDC in 2012.
- Less than 5**  
Decreased academic achievement and IQ; and increased attention-related and other problem behaviors.

1 - Blood test results measured in micrograms of lead per deciliter of blood.

SOURCES: CDC, National Toxicology Program, USA TODAY research  
Frank Pompa, USA TODAY



# Health Effects for Adults

- Irritability and headaches
- Hypertension, increased blood pressure and anemia
- Damage to the central nervous system, kidneys, and reproductive system
- Convulsions, paralysis, and even death, at high exposures



# How Can You Be Exposed to Lead?

- **Eating (Ingestion)**
  - Lead particles on hands transferred to food, drinks, cigarettes
  
- **Breathing (Inhalation)**
  - Lead particles in the air



# **Abatement vs. Renovation**

## **They are separate and distinct!**

- **Separate Rules and Regulations**
- **Different purposes (permanent elimination vs. disturbance)**
- **Different work practices (with some similarities)**
- **Clearance Testing vs. Cleaning Verification**
- **Different pre-education requirements**
  - **Abatement (Occupant Protection Plan) vs. Renovation (Reno-Right Brochure)**
- **Different recordkeeping requirements & documentation**
- **Different training courses**
- **Different certification requirements**
  - **Abatement (some disciplines-experience/3<sup>rd</sup> party exam, workers) vs. Renovator (no experience or exam beyond the training course, workers must be trained)**
- **If you do both, you will need both certifications**

# Is it Abatement or Renovation?

- **What is the intent of the project (permanent elimination or renovation) – why are you doing it?**
- **Intent to permanently eliminate lead-based paint can be established in several ways:**
  - **Abatement required by Lead-Safe Housing Rule (example: abatement of identified lead hazards with rehabilitation assistance is over \$25K/unit)**
  - **Abatement is required by court order or agency order**
  - **Project work specifications or other documents call for abatement (regardless of cost or size of project)**

# What Abatement is not!

- EPA regulations (40 CFR Part 745.223) exclude renovation, remodeling or other activities, when such activities are not designed to permanently eliminate lead-based paint hazards, but, instead are designed to repair, restore, or remodel a given structure or dwelling, even though these activities may incidentally result in a reduction or elimination of lead-based paint hazards.
- When the primary purpose of work is rehabilitation or weatherization, EPA and HUD do not consider such activities to be abatement.
- Source: HUD/EPA Abatement letter dated April 19, 2001 – The accompanying “Guidance on HUD/EPA Abatement Letter - stresses the importance of intent in determining whether or not a specific activity constitutes abatement.

# What is Renovation?

- ***Renovation*** means the modification of any existing structure, or portion thereof, that results in the disturbance of painted surfaces, **unless that activity is performed as part of an abatement as defined by this part (40 CFR 745.223).**
- A renovation performed for the purpose of converting a building, or part of a building, into target housing or a child-occupied facility is a renovation under this subpart.
- The term renovation does not include minor repair and maintenance activities.

# What does Renovation include?

- Renovation includes most repair, remodeling, and maintenance activities, including window replacement and demolition of painted surface areas
- Work that disturbs painted surfaces
  - > 6 square feet per room – interior work
  - > 20 square feet – exterior work
  - Projects smaller in size than those above and that do not use prohibited work practices are considered **minor repair & maintenance activities** and are not included in the definition of renovation

# Typical Reno - Problems

Photo Taken 05/2013



3/31/2016

# Renovation

Component replacement,  
window, exterior sill

Scrape & Repaint Siding

# Poor Work Practices



Photo Taken 05/2013

3/31/2016



Photo Taken 05/2013

# Poor Work Practices



3/31/2016

# Basic Sequence of Events for a Renovation

- 1. Occupant Protection-Pre-Renovation Education (Information Distribution) Renovate Right pamphlet & any lead testing results by renovator provided to owner/occupant prior to starting work. Post Signs**
- 2. Renovate using specified “Work Practices” (includes specialized cleaning & cleaning verification)**
- 3. Recordkeeping – Firm retains copies & copies to owner/occupant**

# Information Distribution Before Starting Renovation

- **In target housing, firms must:**
  - **Distribute EPA’s “Renovate Right” lead pamphlet to the owner and occupants before renovation starts**
  - **No more than 60 days out and obtain written documentation or by mail 7 days prior**
- (24 CFR Part 35 –LSHR- within 15 calendar days of the date the designated party receives the report)

Available on  
NC Lead  
website

# THE LEAD-SAFE CERTIFIED GUIDE TO RENOVATE RIGHT

WARNING  
WORK AREA  
NO SMOKING  
NO EATING

CAUTION CAUTION CAUTION CAUTION

Important lead hazard information for  
families, child care providers and schools.



# Information Distribution Before Starting Renovation

- In a child-occupied facility, firms must :
  - Distribute the “Renovate Right” lead pamphlet to the owner of the building or an adult representative of the child-occupied facility before the renovation starts
  - Provide parents/guardians of the children attending the child-occupied facility the pamphlet & information describing renovation (nature, location, and completion date) by mail or by posting signs during the renovation informing them how they can get or review the pamphlet and how to get or review a copy of required records (at no cost)
  - Firm must prepare, sign & date statement describing steps performed to notify parents & guardians of the renovation and to provide the pamphlet

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# Work Practice Standards



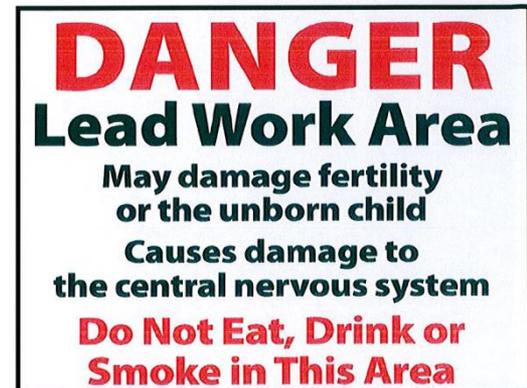
# Work Practice Standards

- Occupant protection/Must Post Signs – define work area & warn others to stay out
- Must use NC Certified Firm / NC Certified Renovator & Trained Workers

\*Work Area = area the cert. renovator establishes to contain dust & debris



RRP Acceptable



OSHA – required >PEL

# Work Practice Standards (cont.)

- **Must Contain Work Area**
  - **No dust or debris leave the work area**
  - **Interior renovations:**
    - **Remove Belongings or Cover & Seal with Plastic/Impermeable material**
    - **Close & cover ducts opening in work area**
    - **Close windows and doors in work area, cover doors with plastic**
    - **Entry doors to work area-allow worker pass-through**

**Poly Not Sealed**



# Work Practice Standards (cont.)

- **Interior renovations (cont.):**
  - **Cover floor surface with taped-down plastic sheeting 6 ft. beyond perimeter of renovation surface or sufficient to contain dust, whichever is greater**
  - **Personnel, tools, exterior of waste containers and other items are free of dust before leaving work area**

# Poor Prep "Not 6 ft."



# Work Practice Standards (cont.)

## – Exterior renovations

- Close windows and doors within 20 feet of work
- Cover the ground with impermeable material
  - extending 10 ft. beyond work area or sufficient to collect debris, whichever is greater
- *If* renovation will affect surfaces within 10 feet of the property line, firm must erect vertical containment or equivalent extra precautions, to ensure dust or debris does not contaminate adjacent buildings or migrate to adjacent properties.

# No Containment/Poor Work



# Work Practice Standards (cont.)

- **Clean the work area**
- **Perform Post-Reno Cleaning Verification or Dust Clearance Testing**
- **Proper Waste Disposal**
- **Do not use prohibited/restricted work practices**

# Prohibited & Restricted Practices

- **Open-flame burning or torching – prohibited**
- **Machines – that use high speed operation (such as: sanding, grinding, abrasive blasting, etc.) unless has shrouds or containment system equipped with HEPA vacuum (no visible dust or release outside shroud or containment)**
- **Heat gun – only at temperatures below 1100 °F**

**(Note: Paint stripping using volatile strippers in poorly ventilated areas, dry sanding/scraping, uncontained hydro blasting or high pressure wash and paint stripping using methylene chloride – These methods are not recommended or are prohibited by HUD)**

# Cleaning the Work Area

- **Use High-efficiency Particulate Air (HEPA) vacuums**
  - **Designed**
    - **Capable of capturing particles of 0.3 microns with 99.97% efficiency**
    - **HEPA filter is last filtration stage, all air expelled through filter - no leakage**



# Work Practice Standards

## – Interior & Exterior work

- **Collect all paint chips & debris, without dispersing**
- **Remove protective sheeting - mist, fold dirty side inward, tape to seal or bag and seal**
- **Dispose of sheeting as waste**



# Work Practice Standards

- **Cleaning the work area (cont.)**
  - **Additional cleaning for interior renovation**
    - **All objects & surfaces in the work area and within 2 feet of the work area, cleaning higher to lower**
      - **Walls – either HEPA vac or wiping with damp cloth**
      - **Remaining surfaces & objects – HEPA vac**
        - » **Beater bar required for carpets/rugs**



# Work Practice Standards

- **Cleaning the work area (cont.)**
  - **Additional cleaning for interior (cont.)**
    - **Damp Wipe all remaining surfaces & objects in the work area (except carpeted or upholstered surfaces)**
    - **Mop uncarpeted floors using mopping method that keeps wash water separate from rinse water (2 bucket method or \*wet mopping system)**



# Work Practice Standards

- **Waste – contained to prevent release of dust or debris before removed from the work area**
  - Stored (at end of each day and at conclusion of renovation) under containment, in an enclosure, behind a barrier that prevents access to dust and debris
  - Firm must contain waste to prevent release of dust and debris when transporting

# Residential Waste is not Hazardous Waste



# Post-Renovation Cleaning Verification

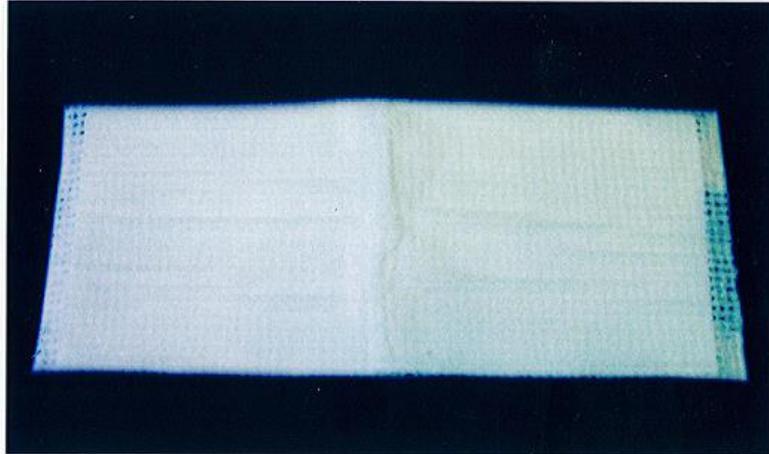


# Standards for Post-Renovation Cleaning Verification

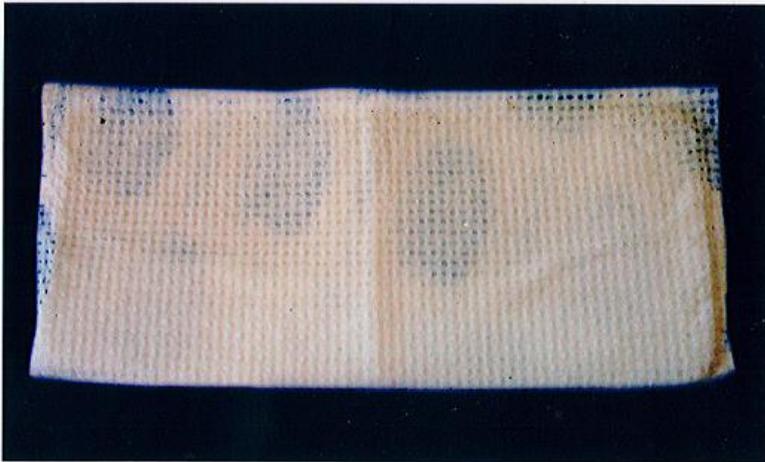
- **A Certified Renovator is required to perform post-renovation cleaning verification (Can't be done by worker). Optional dust clearance can be specified.**
- **Interior Cleaning Verification consists of a visual inspection and visually comparing a wet disposable cleaning cloth (sill, floor and countertop in work area) with a “standard card” for comparison**

# Sample CV Card

## EPA Post-Renovation Cleaning Verification Card



Unused Wet Disposable Cleaning Cloth



Marginally Passing Wet Disposable Cleaning Cloth

## Instructions for Conducting Post-Renovation Cleaning Verification

Following work area cleaning using the appropriate work practice standards, a certified renovator must perform a visual inspection to determine whether dust, debris, or residue is still present. If dust, debris, or residue is still present, these conditions must be removed by recleaning and another visual inspection must be performed. After a successful visual inspection, a certified renovator must complete the following steps.

### Performing the Cleaning Verification

- (1) Verify that each **windowsill** in the work area has been adequately cleaned:
  - A. Wipe the windowsill with a wet disposable cleaning cloth (DCC) that is damp to the touch.
  - B. If the cloth matches or is lighter than the picture of the marginally passing cloth on the front of this card, then the windowsill has been adequately cleaned.
  - C. If the cloth is darker than the picture of the marginally passing cloth, then re-clean the windowsill using appropriate cleaning methods.
  - D. Using a new cloth or folding a used cloth so that an unused surface is exposed, wipe the windowsill again. If the cloth matches or is lighter than the picture of the marginally passing cloth, then the windowsill has been adequately cleaned.
  - E. If the cloth again is darker than the picture of the marginally passing cloth, then wait for 1 hour or until the surface has dried completely, whichever is longer.
  - F. After waiting for the windowsill to dry, wipe the sill with a dry DCC. After this wipe, the windowsill has been adequately cleaned.
- (2) Verify that **uncarpeted floors and countertops** within the work area have been adequately cleaned:
  - A. If the surface within the work area is greater than 40 ft<sup>2</sup>, it must be divided into roughly equal sections that are each less than 40 ft<sup>2</sup>.
  - B. Wipe each section of floor or surface less than 40 ft<sup>2</sup> with a wet DCC. Floors must be wiped using an application device with a long-handle and a head to which the cloth is attached. The cloth must remain damp at all times while it is being used to wipe the surface for post-renovation cleaning verification.
  - C. If the cloth matches or is lighter than the picture of the marginally passing cloth on the front of this card, then that section or surface has been adequately cleaned.
  - D. If the cloth used to wipe a particular section or surface is darker than the picture of the marginally passing cloth, then re-clean that section or surface using appropriate cleaning methods.
  - E. Using a new wet DCC, wipe that section or surface again. If the cloth matches or is lighter than the picture of the marginally passing cloth, that section or surface has been adequately cleaned.
  - F. If the cloth is darker than the picture of the marginally passing cloth, then wait 1 hour or until the entire surface within the work area has dried completely, whichever is longer.
  - G. After waiting for the entire surface within the work area to dry, wipe each section of the surface that has not yet achieved post-renovation cleaning verification with a dry DCC. After this wipe, that section of the surface has been adequately cleaned.

This card is good until last day of the month and year indicated below.

Month	1	2	3	4	5	6	7	8	9	10	11	12
Year 20xx	10	11	12	13	14	15	16	17	18	19	20	21

# Standards for Post-Renovation Cleaning Verification

- **Visual inspection – dust, debris or residue**
- **Each windowsill in work area – wipe with “wet” disposable cloth**
  - **Color matched or is lighter = clean**
  - **Color darker = re-clean the sill, wipe surface again with “wet” cloth**
    - **Color matched or lighter = clean**
    - **Color darker, wait 1 hr. or until surface dry – wipe with “dry” cloth = clean**

# Standards for Post-Renovation Cleaning Verification

- **Uncarpeted floors and countertops within the work area**
  - **Wipe with damp cloth – area 40 SF**
    - **>40 SF area – divide into equal sections & wipe each with own damp cloth**
  - **Color matched or is lighter = clean**
  - **Color darker = re-clean, wipe surface again with “wet” cloth**
    - **Color matched or lighter = clean**
    - **Color darker, wait 1 hr. or until surface dry – wipe with “dry” cloth = clean**

# Standards for Post-Renovation Cleaning Verification

- **Optional Dust Clearance Testing – must be done by a certified LBP Inspector/Risk Assessor/Dust Sampling Technician (DST)**
- **Note: HUD – requires clearance testing following renovation or abatement – must be done by NC certified LBP Inspector/RA**

# Standards for Post-Renovation Cleaning Verification

- **Exterior Cleaning Verification consists of a visual inspection and ensuring no dust, debris or residue are present on surfaces below the work area and the ground.**

# What to look for: NC Renovation Certifications

- **NC Firm Certification (Renewed every year)**
  - Letter & Certificate from HHCU
  - Firms can be found on our website
  
- **Renovator Certification (Every 5 years)**
  - Letter with Renovator Certification # 17XXXX

# Sample NC RRP Firm Certification Letter



North Carolina Department of Health and Human Services  
Division of Public Health

Pat McCrory  
Governor

Aldona Z. Wos, M.D.  
Ambassador (Ret.)  
Secretary DHHS  
Penelope Slade-Sawyer  
Division Director

August 14, 2014

Don Chaney  
Health Hazards Control Unit  
5505 Six Forks Road  
Raleigh, NC 27609

Dear Don Chaney:

Based upon the review of your North Carolina Renovation Firm Certification application, the Health Hazards Control Unit (HHCU) has determined that you have met the certification requirements and are eligible for Renovation Firm Certification. Your assigned **Firm Certification Number is RRP2767**, which is reflected on your enclosed North Carolina Lead Renovation Firm Certification certificate.

**Your North Carolina Renovation Firm Certification will expire on August 31, 2015.** Your firm certification must be renewed annually. It is NOT the policy of the HHCU to issue renewal notices. If you wish to remain a Certified Renovation Firm after this expiration date, you must submit a completed application to this office prior to August 31, 2015. If you should continue to perform lead-based paint renovation activities without a valid North Carolina Renovation Firm Certification, you will be in violation of State regulations and may be cited for noncompliance.

This is the only correspondence you will receive from the HHCU to document your lead certification. Keep this letter and attached certificate for your records. **You are required to keep a copy of the Program issued firm certificate on-site during renovation activities.** If you have any questions, please contact the HHCU at (919) 707-5950 or go to our website at <http://www.epi.state.nc.us/epi/lead/lhmp.html>.

Sincerely,

Ed Norman  
Program Manager  
Health Hazards Control Unit

NC Firm  
Cert #

# Sample NC RRP Firm Certificate



North Carolina Department of Health and Human Services  
Division of Public Health

## Health Hazards Control Unit

*Lead-Based Paint Hazard Management Program  
for Renovation, Repair, And Painting*

Health Hazards Control Unit

*Is Issued Lead Renovation Firm Certification*

NC Firm Certification #

**RRP2767**

*Valid between August 14, 2014 and August 31, 2015*

Program Manager

NC Health Hazards Control Unit  
1912 Mail Service Center, Raleigh, NC 27699-1912  
Phone 919-707-5950

# Sample NC RRP Renovator Certification Letter



North Carolina Department of Health and Human Services  
Division of Public Health

Pat McCrory  
Governor

Aldona Z. Vos, M.D.  
Ambassador (Ret.)  
Secretary DHHS  
Penelope Slade-Sawyer  
Division Director

August 14, 2014

Renovators Name  
Mailing Address

NC Renovator Cert #

KEEP THIS LETTER FOR YOUR RECORDS.  
**Renovator Certification No: 174208**  
**Initial Certification: August 14, 2014**  
**Expiration Date: July 31, 2019**

Dear Mr. Smith :

The Health Hazards Control Unit (HHCU) has determined that you have met the application requirements and are eligible for lead certification as a Renovator. Your assigned **Renovator Certification Number is 174208**. The State requires that persons conducting lead-based paint renovation, repair, and painting activities in residential housing and child-occupied facilities built before 1978, be certified. In addition, you must be employed by a certified renovation firm when conducting renovation activities for compensation in target housing or child-occupied facilities.

An accredited initial or refresher Renovator training course must be completed at least every 60 months from the date of completion of the initial training course. The HHCU strongly recommends that individuals note the date of certification expiration and ensure all required training is completed prior to the expiration date. **Your North Carolina Renovator certification expires on JULY 31, 2019**. It is NOT the policy of the HHCU to issue renewal notices. If you wish to continue working as a certified Renovator after this expiration date, you must submit a completed application to this office prior to July 31, 2019. If you should perform lead-based paint renovation activities as a Renovator without a valid North Carolina certification, you will be in violation of State regulations and may be cited for noncompliance.

**You are required to keep a copy of this Program issued certification letter on-site during renovation activities.**

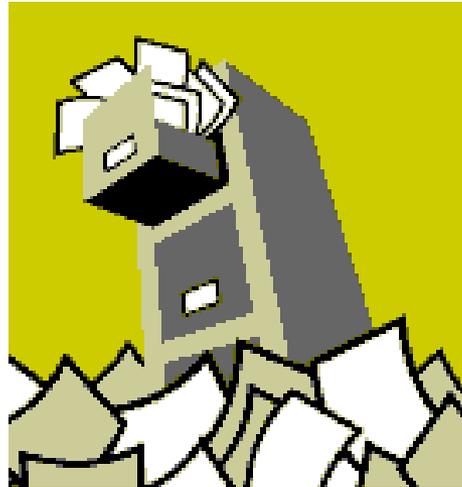
If you have any questions, please contact our office at (919) 707-5950 or go to our website at <http://www.epi.state.nc.us/epi/lead/lhmp.html>.

Sincerely,

Handwritten signature of Ed Norman in black ink.

Ed Norman  
Program Manager  
Health Hazards Control Unit

# RRP Firm Recordkeeping Requirements



# Recordkeeping Requirements (Retain all records)

- ✓ **Signed & dated acknowledgements of receipt information distribution**
- ✓ **Record of Notification Activities for Common Areas and Child-Occupied Facilities**
- ✓ **Certifications of attempted delivery or mailings**
- ✓ **Document nature of “Emergencies” – provisions of the rule not followed**
- ✓ **Reports of “no lead” by NC certified Inspectors/Risk Assessor**

# Recordkeeping Requirements (cont.)

- ✓ If test kits were used – document brand, specified location(s) & results
- ✓ Documentation that Renovator and Firm is Certified
- ✓ Documentation of compliance with Work Practice Standards and Trained Workers
- ✓ Documentation that Dust Sampling Technician is Certified (if used)
- ✓ Documentation of Clearance Results by Wipe Sampling (if used)
- ✓ Documentation that Cleaning Verification was performed

# Recordkeeping Requirements (cont.)

- ✓ Upon delivery of final invoice or within 30 days of completion (whichever is earlier) provide at no cost to owner/adult occupant of housing or adult representative COF information demonstrating compliance with the training & work practice requirements, information on test kits used, and dust clearance reports (if done).
- ✓ For Multi-unit Common areas - firm must post information demonstrating compliance with the training & work practice requirements, information on test kits used, and dust sampling reports (if applicable) or provide instructions how occupants can obtain a copy of this information.
- ✓ Renovators can use: RR&P Sample Recordkeeping checklist – SECG or something similar, like the NC RRP Recordkeeping Checklist.
- ✓ Firm keep all records for 3 years.

# Questions/More Information

**NC Lead-Based Paint Website:**

**<http://epi.publichealth.nc.gov/lead/lhmp.html>**

**For additional information: Contact the HHCU at  
919-707- 5950**

