WELCOME!

U.S.EPA/HUD Lead Safety for Renovation, Repair and Painting (RRP) Train-the-Trainer Program

U.S. Department of Housing and Urban Development in cooperation with the U.S. Environmental Protection Agency and the University of Cincinnati
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Information for Training Providers

- www.epa.gov/lead/pubs/epahudrrmodel.htm

- Training Provider Application Instructions describe what needs to be in the application and the accreditation fees, if applicable.
Key information required in the application:

• Statement certifying the basis of the training curriculum (EPA-approved or non-approved—if non-approved then include a course agenda and copies of the student and instructor manuals);

• A description of the training facilities and hands-on equipment used during training;
• A copy of the course test;
• A description of the activities and procedures that will be used to assess the skills associated with the hands-on component of the course;
• A copy of the quality control plan as required by 40 CFR 745.225(c)(9).
Instructions for Accredited Training Providers

• This document provides EPA accredited renovator and dust sampling technician training providers instructions regarding:
  • Certificate requirements and numbering protocol
  • How to notify EPA of training activities
  • Eligibility requirements for refresher training
  • Instructions for digital photograph submission
  • Recordkeeping requirements
  • Cleaning verification cards
The purpose of the webinar is to assist RRP training providers in the set-up and effective delivery of the Initial and Refresher courses.
RRP Course Agenda – Initial Course

• Introduction and welcome
• Module 1: Why Should I Be Concerned About Lead Paint?
• Module 2: Regulations
• Break
• Module 3: Before Beginning Work
• Module 4: Contain Dust During Work
• Lunch
• Module 5: During the Work

• Break
• Module 6: Cleaning Activities and Checking Your Work
• Module 7: Recordkeeping
• Break
• Module 8: Training Non-Certified Renovation Workers
• Review
• Test
Agenda – Refresher Course

• Introduction and welcome
• Module 1: Federal Regulations
• Module 2: Using EPA-Recognized Test Kits
• Module 3: Review of Setup Practices
• Break
• Module 4: Review of Prohibited Practices, Personal Protective Equipment and Dust Control
• Module 5: Review of Cleanup Practices, Cleaning Verification Procedure & Hands-on
• Module 6: Record-keeping
• Module 7: Training Non-Certified Renovation Workers
• Test
RRP
INTRODUCTION
MODULE
Learning Objectives

Introduction
At the end of this module, you will be able to:

1. Explain the proper role of the renovator in preventing lead poisoning;

2. Describe ways to creatively illustrate the small amount of lead dust known to be a lead hazard.
Health Risks of Lead

• Ask for Trainee experiences
• Documentation you can use:
  • Painter’s diary
  • Franklin letter
  • Personal stories
Symptoms Of Lead Poisoning are Not Always Obvious

- Symptoms are easily misinterpreted by medical personnel, thus delaying effective treatment and increasing the likelihood of permanent physical and mental damage.
- Only sure way to determine lead poisoning is to take a blood lead level (BLL) test.
Why are Dust and Debris a Problem?

• Renovation activities that disturb lead-based paint create dust and debris. Debris becomes dust.

• Lead-contaminated dust is poisonous.

• Very small amounts of lead-contaminated dust can poison children and adults.
  • Children swallow dust during ordinary play activities.
  • Adults swallow or breathe dust during work activities.

• Workers can bring lead-contaminated dust home and poison their families.
A Little Dust Goes a Long Way

- You can’t see it.
- It’s hard to sweep up.
- And, it travels.

One gram of lead-based paint can contaminate a large area!
How to Convey the Concept of a Small Amount of Lead-Contaminated Dust

• Cut a penny into a million pieces.
• One-gram packets of sweetener.
• Calculate the amount of lead dust generated when cutting an 8” wide piece of wood that has leaded paint at 5mg/cm².
This vial contains clean sand.
If it were paint dust containing 10% lead, this amount would be enough to contaminate the floor of a 1,500 square foot house or apartment.

Lead Dust Hurts Kids!

Need more information?
Call EPA Region 5- toll free
800-621-8431 Ext. 6-6003
or go to www.epa.gov/lead/
ODH & UC Dust Demonstration

- Vials #1-4 contain lead-based paint containing 12% lead.
- Vial 1 = paint to contaminate 1 ft² to 40 µg/ft².
- Vial 2 = contaminates 1 ft² to 250 µg/ft².
- Vial 3 = contaminates 1 ft² to 400 µg/ft².
- Vial 4 = contaminates a typical 1,500 ft² home to 40 µg/ft².
RRP
REGULATIONS MODULE
Learning Objectives

Module 2 - Regulations

At the end of this module, you will be able to:

1. list and discuss seven important parts of EPA’s RRP Rule that should be emphasized in RRP training;

2. list and discuss six key differences between HUD’s LSHR and EPA’s RRP Rule that are part of the RRP curriculum; and,

3. express the importance of the certified renovator to determining if state or local regulations with additional requirements exist.
Passed in 1992 Title X Required...

1. U.S. Environmental Protection Agency (EPA):
   a. Established accredited training and certification programs for workers, supervisors, inspectors and risk assessors conducting evaluation or abatement of lead-based paint.
   b. Established requirements for pre-renovation education.

2. U.S. Department of Housing and Urban Development (HUD) established:
   a. actions in Federally-assisted target housing.
   b. Federal grant programs.
   c. guidelines for lead-based paint evaluation and control; established the Lead Safe Housing Rule.

The RRP Rule

• Addresses activities that disturb lead-based paint in target housing and child-occupied facilities. It requires:
  • Renovators to be certified through training.
  • Firms to be certified.
  • Training providers to be accredited.
  • Lead-safe work practices during renovations.
  • Pre-renovation education in target housing and child-occupied facilities.
• On or after April 22, 2010, firms working in pre-1978 homes and child-occupied facilities must be certified and use lead-safe work practices during renovations.
• EPA may authorize states, territories and tribes to enforce the Rule.
The RRP Rule: Exclusions

• Renovation activities where affected components do not contain lead-based paint.

• Emergency renovations (requires cleanup and cleaning verification).

• Minor repair and maintenance activities. *Note: This exclusion does not apply to window replacement, demolition, or activities involving prohibited practices.*

• Renovations performed by homeowners in their own homes.
The HUD lead Safe Housing Rule applies to every home built prior to 1978 that receives Federal housing assistance, typically provided through state and local governments, where greater than HUD’s *de minimis* amounts of painted surfaces will be disturbed. HUD’s *de minimis* amounts are: 2 square feet of interior lead-based paint, 20 square feet of exterior lead-based paint or 10% of the total surface area on an interior or exterior type of component with a small surface area that contains lead-based paint. Examples include window sills, baseboards, and trim.
The RRP Rule: “Opt-Out” Provision

- Homeowners may sign a statement to opt out of the work practice requirements in the Rule, if all of the following are true:
  - The owner resides in the house;
  - No child under 6 years old resides in the house and the house is not a child-occupied facility;
  - No pregnant woman resides in the house;
  - No child-occupied facility exists on the property; and,
  - The owner signs a written acknowledgement that the Certified Firm is not required to use work practices found in the Rule.
The RRP Rule: Firm Certification

• On or after April 22, 2010, all covered renovations must be performed by Certified Firms, using Certified Renovators and other trained workers.

• To become certified, firms must submit an application, and pay a fee, to EPA. Firms may begin to apply for certification on October 22, 2009.

• Certifications will be good for 5 years.

• Certification allows the firm to perform renovations in any non-authorized state or Indian tribal area.
The RRP Rule:
Individual Certification

• To become a Certified Renovator, an individual must take an EPA-approved 8-hour training course from an EPA-accredited training provider.

• The course completion certificate serves to certify renovators (no application to EPA is required).

• Refresher training is required every 5 years.

• Workers do not need certification so long as on-the-job training is received from a Certified Renovator and the work is not HUD-regulated.
HUD’s Lead Safe Housing Rule

Covers federally-owned or -assisted target housing and federally-owned target housing being sold. Renovators should ask if the housing receives financial assistance.

• If yes, the renovator should ask the owner to find out if the assistance is federal assistance.

HUD’s rule has evaluation and control requirements based on type of assistance:

• Visual assessment, lead paint inspection;

• Paint stabilization, interim control, abatement;

• Ongoing lead-based paint maintenance.
HUD’s Lead Safe Housing Rule: Safe Work Practices

• HUD’s rule requires lead safe work practices for:
  • Paint stabilization
  • Interim control of identified lead-based paint hazards
  • Rehabilitation (renovation)
  • Standard treatments
  • Ongoing lead-based paint maintenance

– HUD’s de minimis level is smaller than the RRP Rule’s minor repair and maintenance level
State and Local Regulations

• States and localities may have different regulations than EPA and HUD for renovations in target housing.
• Check with your state and local housing and environmental agencies to obtain information about such requirements.
• Appendix 7 is reserved for copies or summaries of state and local regulations.
RRP
SET-UP PRACTICES
MODULE
Module 3 - Setup Practices

At the end of this module you will be able to explain the importance of:

- Containing dust during interior work.
- Protecting the occupants.
Keep Dust Within the Containment

- **Containment is required.**

- **The renovator:**
  - Is responsible for making sure dust does not migrate out of containment.
  - Should consider how much dust the renovation will generate.
  - Should plan the size and configuration of containment to keep the generated dust within containment.
Overview of Interior Setup Steps

• The goal of these interior setup practices is to prevent dust and debris from escaping the work area.
• Limit access and post signs.
• Remove or cover belongings.
• Cover floors.
• Close windows, doors, and HVAC system.
• Work area entry.
Interior and Exterior Containment

Hands-on Exercise

**Purpose:** This exercise allows trainees to gain experience in setting up the work area.
RRP
Prohibited Practices, PPE, Dust Control & Paint Testing Module
Learning Objectives

Module 4 - Prohibited Practices, PPE, Dust Control & Paint Testing

At the end of this module, you will be able to:

1. explain the differences between RRP prohibited practices and HUD prohibited practices;
2. give a general overview of the relationship between the worker safety requirements of OSHA, RRP, and LSHR; and,
3. explain the requirements and limitations for using U.S.EPA lead test kits.
RRP Prohibited Practices!

1. Open-flame burning or torching.
2. Heat gun above 1100º F.
3. Power sanding, power grinding, power planing, needle guns, abrasive blasting and sandblasting, without HEPA vacuum attachment.
HUD’s Prohibited Practices!

EPA’s THREE, PLUS:

4. Using heat guns that char paint.
5. Dry scraping or sanding unless you are within 1 foot of electrical outlets/switches.
6. Using a volatile stripper in poorly ventilated spaces.
Dust Reducing Techniques

1. Wet scraping and sanding
2. Heat gun below 1,100 degrees F
3. Use of power tools with attachment to HEPA vacuum
4. Chemical stripping
Protect Yourself!

1. Workers should wear:
   • Disposable painter’s hat.
   • Disposable coveralls.
   1. Repair tears with duct tape.
   2. Dispose of in plastic bag.

2. Disposable N-100, R-100 or P-100 respirator.

3. Wash face and hands frequently and at the end of each shift.
   • Washing helps to reduce hand-to-mouth ingestion of leaded dust.

4. OSHA may require more protection depending on what work is done.
Control the Spread of Dust

1. When you leave the work site, clean yourself and your tools.
2. At the end of the day don’t take lead home to your family on your clothes or in your car.
3. Don’t hug your family until you get clean!
Using EPA-Recognized Test Kits  

Paint testing must be performed prior to renovation on all surfaces to be affected by the work, or you must presume the paint is lead-based. Any testing must be performed by the appropriate qualified professional.

<table>
<thead>
<tr>
<th>Type of Paint Testing for Renovations</th>
<th>Who can do the testing?</th>
</tr>
</thead>
<tbody>
<tr>
<td>EPA-recognized test kits</td>
<td>Certified renovators</td>
</tr>
<tr>
<td>X-Ray Fluorescence instruments</td>
<td>Certified lead-based paint inspectors or risk assessors</td>
</tr>
<tr>
<td>(surface-by-surface)</td>
<td></td>
</tr>
<tr>
<td>Paint chip sampling and laboratory testing</td>
<td>Certified lead-based paint inspectors or risk assessors</td>
</tr>
</tbody>
</table>
Using EPA-Recognized Test Kits to Check for Lead-Based Paint

EPA-recognized test kits:

- Until 9/01/10, EPA will only require the use of test kits that verify the absence of lead-based paint.
- After 9/01/10, test kits must be able to determine whether or not lead-based paint is present.

1. Provide a testing report of results from use of an EPA-recognized test kit to the client as soon as possible, but no later than 30 days after completing the renovation.

2. EPA-recognized spot test kits identify lead-based paint, which has lead at or above the EPA standard. Paint may have lead even when a test kit result is negative. EPA and HUD recommend taking precautions whenever lead in paint, dust or soil is disturbed.
Test Kit Hands-on Exercise

Purpose: The purpose of this hands-on exercise is to teach Certified Renovators how to correctly use EPA-recognized test kits to determine if lead-based paint is present on components and surfaces affected by renovation work.
Test Kit Hands-on Exercise
Test Kit Hands-on Exercise
Test Kit Hands-on Exercise
Test Kit Hands-on Exercise
Test Kit Hands-on Exercise
RRP
CLEANUP PRACTICES
MODULE
Module 5 - Cleanup Practices

At the end of this module, using your notes, you will be able to explain the importance between the requirements of cleanup for job site clearance testing and cleaning verification.
Cleaning During the Job is Very Important

- A clean work site reduces the spread of dust and paint chips.
- **Clean as you work.**
- **HEPA vacuum horizontal surfaces.**
- Remove debris frequently.
- Remove paint chips as they are created.
- As building components are removed, wrap and dispose of them immediately.
- Clean frequently.
Interior Cleaning Requirements

- Collect all paint chips and debris, and seal in heavy duty plastic bags.
- Mist, remove, fold (dirty side in) and tape or seal protective sheeting. Dispose of sheeting as waste.
- Plastic sheeting between non-contaminated rooms and work areas must remain in place until after cleaning and removal of other sheeting.
- HEPA vacuum or wet wipe walls from high to low, then HEPA vacuum remaining surfaces and wipe with a damp cloth.
- Clean 2 feet beyond the contained work area.
- Use disposable wipes or change cloths frequently.
- For carpet or rug, use HEPA vacuum with beater bar.
- HEPA vacuum and wet mop uncarpeted floors.
Visual Inspection Procedure for CR’s

1. Conducted by Certified Renovator.
2. Put on disposable foot covers before entering the work area.
3. Make sure there is adequate lighting in the work area.
4. Systematically look for dust and debris on every horizontal surface in the work area and 2 feet beyond.
5. If you find visible dust or debris, then re-clean the work area and repeat step 4.
6. Once you have carefully looked at all of the surfaces and found no dust or debris, proceed to the cleaning verification procedure or clearance.
Cleaning Verification (CV) Procedure for CR’s

• Wipe each window sill within the work area. Use a single wet disposable cleaning cloth per window sill.

• Wipe uncarpeted floors and all countertops with wet disposable cleaning cloths. Wipe up to a maximum of 40 ft² per cloth.

• Compare each wipe to the CV card. If the cloth matches or is lighter than the CV card, the surface has passed cleaning verification and no further action is required.

• If the cloth is darker than the CV card, re-clean and repeat the CV process.

• If the second wet cloth fails, wait 1 hour or until surfaces are dry, and then wipe with an electrostatically-charged white disposable cleaning cloth designed to be used for cleaning hard surfaces. This completes the cleaning verification.
Purpose: This exercise allows students to demonstrate their knowledge of the cleaning verification procedure.
Dust Clearance Examination

- A dust clearance examination may be performed instead of cleaning verification.
  - A clearance examination must be conducted by a Certified Lead Inspector, Risk Assessor, or Dust Sampling Technician.
  - If clearance fails, the renovation firm must re-clean the work area until dust clearance standards and any state, territorial, tribal and local standards are met.
Exterior Cleanup Requirements for CR’s

• Clean all surfaces in the work area until no visible dust, debris, or residue remains.
• Remove all dust and debris without dispersal, and seal in heavy plastic bags.
• Remove protective plastic sheeting and mist before folding it dirty side inward.
• Check your work.
  – Focus on areas such as window sills, bare soil, and children’s play areas.
  – Look for dust, debris and paint chips.
Exterior – Checking Effectiveness of Cleaning

• Visual inspection
  – A Certified Renovator conducts a visual inspection after any cleaning.
  – Determines if any visible dust and debris are present in and beyond the boundaries of the work area.
  – If visible dust or debris are found, collect and dispose of all paint chips, dust, and debris identified during the visual inspection.
  – After re-cleaning, the Certified Renovator conducts another visual inspection.
  – When all areas pass, warning signs may be removed.
Waste Disposal

• What should be done with waste generated on the job?

• At the work site:
  – Place waste in heavy duty plastic bag.
  – “Gooseneck seal” the bag.
  – Carefully dispose of waste in accordance with Federal and other regulations.
  – HEPA vacuum the exterior of the waste bag before removing it from the work area.
  – Store waste in a secure area.

• Always check local municipal waste requirements.
RRP RECORDKEEPING MODULE
Recordkeeping

At the end of this module the trainees will be able to explain:

1. why it is important to keep records;
2. what five kinds of records must be kept; and
3. how long to keep them.
On-the-job Records

1. Copies of Certified Firm and Certified Renovator certifications (must be kept on site).
2. Lead-based paint testing results when an EPA-recognized test kit is used.
3. Proof of owner/occupant pre-renovation education, including receipt of Renovate Right pamphlet.
4. Opt out certification by owner/occupant, when permitted.
5. Non-certified renovation worker training documentation (must be kept on site).
Post-Renovation Reporting

At the end of each renovation, the Certified Renovator (CR) must sign a report including the following information:

1. Name of CR assigned to lead the project;
2. Copy of CR certification(s);
3. Certification from a CR of non-certified renovation worker training, and a list of the topics covered;
4. Certification of posting of warning signs;
5. Description of chemical spot testing, if any performed;
6. Certification by the CR of work area containment, on-site waste containment and transport, proper post-renovation work area cleaning, and of successful cleaning verification;
7. Clearance report, if performed.
RRP
TRAIN-THE-TRAINER
MODULE
Effective Training Techniques For RRP Training Providers Using the U.S.EPA Model Curricula

At the end of this module regarding on-the-job training of employees, using your notes, you will be able to:

1. discuss how to use the “Seven Steps to Lead Safe Renovation, Repair and Painting” to facilitate on-the-job training of non-certified renovation workers;

2. explain why you should emphasize the three time frames when the certified renovation worker must be on the job site;
3. describe the use of “Structured On-the-Job Training” when training workers and how it differs from non-structured on-the-job training;

4. explain at least 4 effective training techniques important to integrate into your training presentations; and

5. give examples of other appropriate formats for training, and when these formats can/should be used in your training.
Effective Training Techniques Using the U.S.EPA Model Curricula

• Slides are explained well in instructor manual.

• Emphasis, however, is needed for some key concepts.
The Difference in Roles

• When Certified Renovators MUST be at the job site:
  1. When warning signs are being posted.
  2. While the work area containment is being established.
  3. While the work area cleaning is being performed.

• Availability by telephone when not on-site.
• Maintaining on-site documentation of training—their own, and that of their non-certified renovation workers.

• Refresher training is required every five years for the Certified Renovator.
Other Areas of Emphasis

• Using the "Seven Steps to Lead Safe Renovation, Repair and Painting" to facilitate the training of non-certified renovation workers.

• Regard it as a "review" of what your trainees have already learned through the previous six or so hours of training.
Training Locations

- Where should you perform the training?
  - Classroom?
  - On-the-job?
What to Handle **Before** the Worker Is On the Job

- Why they must have the training.
- What parameters they have as non-certified workers.
- What they are going to be learning: give an overview of the “Seven Steps”
Structured On-the-Job Training

Use the Structured On-the-Job Training (SOJT) Model:

“The planned process of developing task-level skills by having a knowledgeable and experienced worker train a novice worker at or near the actual work setting.”

Ronald L. Jacobs, Ph.D.
Six Steps for SOJT

Step 1. Decide whether to use structured or unstructured OJT. Consider:

- The nature of the task
- Available resources
- Constraints in the job setting; and
- Financial considerations
Step 2. Analyzing the tasks to be learned. Don’t waste time training the worker on tasks he/she will not be called upon to do!

Step 3. Select, train & manage the certified renovator you are asking to train the new worker, if the trainer is not yourself.
Step 4. Document the Training!

- **Written certification of worker training:**
  - Indication of which workers have what training;
  - List of all training topics covered for each worker; and
  - Signature of the certified renovator who did the training

- **All training documentation must be kept for three years following completion of the renovation.**
Step 5. Deliver the training

Focus on five key learning techniques:

– Prepare the trainee - focus attention
  **WII-FM!!**

– Present the training

– Require trainee responses

  ask questions!

– Provide feedback to the trainees

– Evaluate performance
Step 6. Evaluate & Troubleshoot

- Ask the trainee to give feedback on the training
- Rate the trainee’s performance.
- Record the training completion.
Other Effective Training Techniques for You!

1. Variety in Presentation Formats
   - Lecture
   - Demonstration
   - Hands-on activities
   - Small group work

   and Media
   - Overheads/white boards/flip charts
   - PowerPoint™ (RRP Curriculum)
   - Videos
   - Props
2. Application to trainees’ concerns.

Adult trainees want to know how the learning will help them on their jobs or in their personal lives. (WII-FM)
3. Clarity

• Use examples that relate to what trainees already know.

• Ask questions.
4. Sufficient Time

Plan sufficient time for training and guided practice.
5. Success

Start off with simple examples/concepts and progress to more difficult examples/concepts.
6.

Practice...

Practice...

PRACTICE!!
The Retention Curve

95% TEACH!
90% Say & Do
70% Say
50% See & Hear
30% See
20% Hear
10% Read

Days 1 2 3 4 5 6 7

RETENTION
100%
75%
50%
25%
0%
Remember:

In the “eyes of the law” you are a “professional” and, as such, you are required to stay current in your field.
A professional trainer must:

• Treat participants with respect.
• Keep their training commitments.
• Maintain accurate, honest training records.
• Respect copyright/trademark laws.
Wrapping Up!

Time to address your questions.
The RRP Rule requires that only the supervisor be trained and then he is responsible for training his/her workers while HUD is still requiring that everyone present on a worksite being supported by HUD completes an approved course. Why?
Q Why is the EPA requiring certified lead abatement contractors to secure additional RRP certification?
How is the EPA notifying contractors (general contractors, painting, plumbing, electrical, cable contractors, etc.) of the RRP Rule?
Q Can employees with the 8 hours Lead Safe Work Practices training/certification conduct lead abatement?
More Questions?
Taking the Test:

The test page will NOT automatically pop up. You will need to go to the link in your email invitation—the same one you used to join the Webinar hud-lead-trainthetrainer.webex.com. You should get a reminder email to take the test and it will also contain a direct link.

You MUST do this within 7 days of today’s Webinar!
Thank you for your attention.
Resources:

• U.S.EPA Application Materials: www.epa.gov/lead/pubs/renovation.htm

• Instructions for applying for approval: http://hud.gov/webcasts/archives/envirhealth.cfm

• Remember the Webinar URL: http://hud-lead-trainthetrainer.webex.com