



LRRP & LSW

DOCUMENTATION

What are the requirements?



Agency Requirements

- All Auditors/Inspectors must be certified renovators
- All Auditors/Inspectors must be trained in Lead Safe Weatherization
- All agencies must be certified firms either through OHA or the CCB. (Send OHCS a copy of OHA certification)
- If crews are used, a certified renovator must be present at set up and tear down
- All non-certified crew members must be trained in LRRP by the renovator
- All crew members must be trained in Lead Safe Weatherization

Contractor Requirements

- Must have at least one renovator on staff
- All workers must be trained by the renovator in USDOE Lead safe Weatherization
- Must be a Lead Based Paint Renovation License (certified firm) through the CCB
- Renovator certificate(s) must be on file with the agency
- Lead Based Paint Renovation License must be on file with the agency

Client Notification

Pre-Renovation Form

Confirmation of Pamphlet Receipt

I have received a copy of the pamphlet, *The Lead-Safe Certified Guide to Renovate Right*, 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.

Printed name of owner or occupant

Signature of owner or occupant

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 delivered)

Printed name of person certifying delivery

Attempted delivery date and time

Signature of person certifying

Unit address

Note Regarding Mailing Option — As an alternative to delivery in person, you may mail the lead 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.



Owners and occupants of a house or apartment built before 1978 must be notified no greater than 60 days before weatherization takes places.

1. Provide *Renovate Right* Publication.

2. Explain LSW Basics & Expectations.

3. Documentation of Client Ed.

4. File for 3 Yrs.

In multi-unit housing, the agency must:

1. Provide owner with lead pamphlet within 60 days of the renovation.
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.

TESTING FOR LEAD

Is It Required?

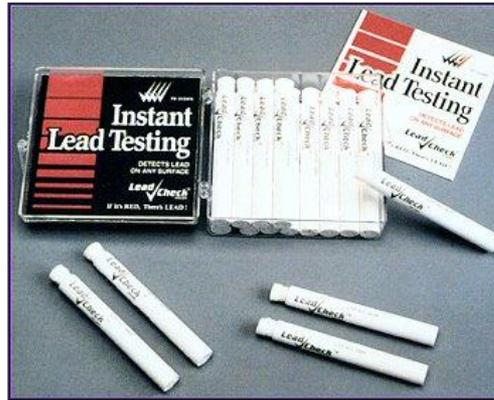
Who can do the testing?

Type of Paint Testing for Renovations	Who can do the testing?
EPA-recognized test kits (<i>Lead Check</i> & <i>D-Lead</i>)	Certified Renovators
Paint chip sampling using NLLAP laboratory (as of 10/5/11)*	Certified Renovators
X-Ray Fluorescence instruments (surface-by-surface)*	Certified lead-based paint inspectors or risk assessors

Review all testing options using WxTV episode, [“How To Be Lead-Safe: Testing For Lead](#) – www.wxtv.org

Running Length : 12:10
Date: 11/29/12

Lead Testing Methods



Paint Chip Sample

EPA Recognized Test Kits



XRF (X-ray Fluorescence)

LEADSAFETY for Remodeling, Repair and Painting

Test Kit Documentation Form

Page 1 of __

Owner Information

Name of Owner/Occupant: _____
Address: _____
City: _____ State: _____ Zip code: _____ Contact #: (____) ____-____
Email: _____

Renovation Information

Fill out all of the following information that is available about the Renovation Site, Firm, and Certified Renovator.

Renovation Address: _____ Unit# _____
City: _____ State: _____ Zip code: _____

Certified Firm Name: _____
Address: _____
City: _____ State: _____ Zip code: _____ Contact #: (____) ____-____
Email: _____

Certified Renovator Name: _____ Date Certified: ____ / ____ / ____

Test Kit Information

Use the following blanks to identify the test kit or test kits used in testing components.

Test Kit #1
Manufacturer: _____ Manufacture Date: ____ / ____ / ____
Model: _____ Serial #: _____
Expiration Date: _____

Test Kit #2
Manufacturer: _____ Manufacture Date: ____ / ____ / ____
Model: _____ Serial #: _____
Expiration Date: _____

Test Kit #3
Manufacturer: _____ Manufacture Date: ____ / ____ / ____
Model: _____ Serial #: _____
Expiration Date: _____

A swab verification card must be present in the file when a negative result is found on plaster or drywall.



It's recommended that a verification card be included in the file whenever testing is done.

Renovation Recordkeeping Checklist

Name of firm: _____ Date: _____

Location of renovation: _____

Brief description of renovation: _____

If emergency renovation, describe emergency _____

Name of assigned renovator: _____

Name(s) of trained worker(s), if used: _____

(Use separate sheet if needed)

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 | ___ Setting up plastic containment barriers |
| ___ Maintaining containment | ___ Avoiding spread of dust to adjacent areas |
| ___ Waste handling | ___ Post-renovation cleaning |

___ Test kits used by certified renovator to determine whether lead was present on components affected by renovation (see attached report).

___ 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.

___ Copy of Renovation Recordkeeping Checklist or other documentation of compliance provided to the building owner and occupant (if applicable).

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

Name and title

Date



Non-Certified Workers Training Log

PARTICIPANTS PROGRESS LOG

Name of Trainee	Module 3 (15 min)	Module 4 (45 min)				Module 5 (10 min)	Module 6 (50 min)				
	Skill Set 1: Using LeadCheck® Test Kit	Skill Set 2: Setting up Barriers, Signs and Flapped Entry Doors	Skill Set 3: Cover or Remove Furniture	Skill Set 4: Establish Interior Containment	Skill Set 5: Establish Exterior Containment	Skill Set 6: Personal Protective Equipment	Skill Set 7: Interior Final Cleaning	Skill Set 8: Exterior Final Cleaning	Skill Set 9: Bagging Waste	Skill Set 10: Visual Inspection	Skill Set 11: Cleaning Verification Process

Date of Training: _____

Certified Renovator Name: _____

Important
 The Skill Sets shaded above are only things that a Certified Renovator can do! It is important for the Non-Certified Workers to understand the rules and guidelines but they cannot Test, Verify, Supervise Containment or place the signs and barriers

Recordkeeping: Non-Certified Worker Training

- Worker's name.
- Description of lead safe work practices the worker is trained to perform.
- Completed and signed skills evaluation checklists.
- Date(s) of training.
- Name and signature of the Certified Renovator who conducted the training

Worker Safety

P-100 "HEPA"
Disposal or
Fit-tested
respirator.
N-100 masks
are **not** allowed
under LSW.



Minimum LSW Personal
Protective Equipment (PPE):

- Disposal suit.
- Disposal head-cover.
- Respirator.

CONTAINMENT

What is acceptable?

Photo Documentation of Containment and Testing is Required by LSW!



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- Level 1 containment: (Not required by LRRP) LSW
Level 1 containment is required in pre-1978 homes when *less than* 6 ft² of interior painted surface per room or less 20 ft² of exterior painted surface will be disturbed.

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Level 1 containment is required in pre-1978 homes when *less than* 6 ft² of interior painted surface per room or less 20 ft² of exterior painted surface will be disturbed.
- Level 2 containment: Level 2 containment is required when Weatherization activities will disturb *more than* 6 ft² of interior surface per room or 20 ft² of exterior surfaces in homes built prior to 1978.

LSW Level 1 containment consists of methods that prevent dust generation and contains all debris generated during the work process. The containment establishes the work area which must be kept secure.

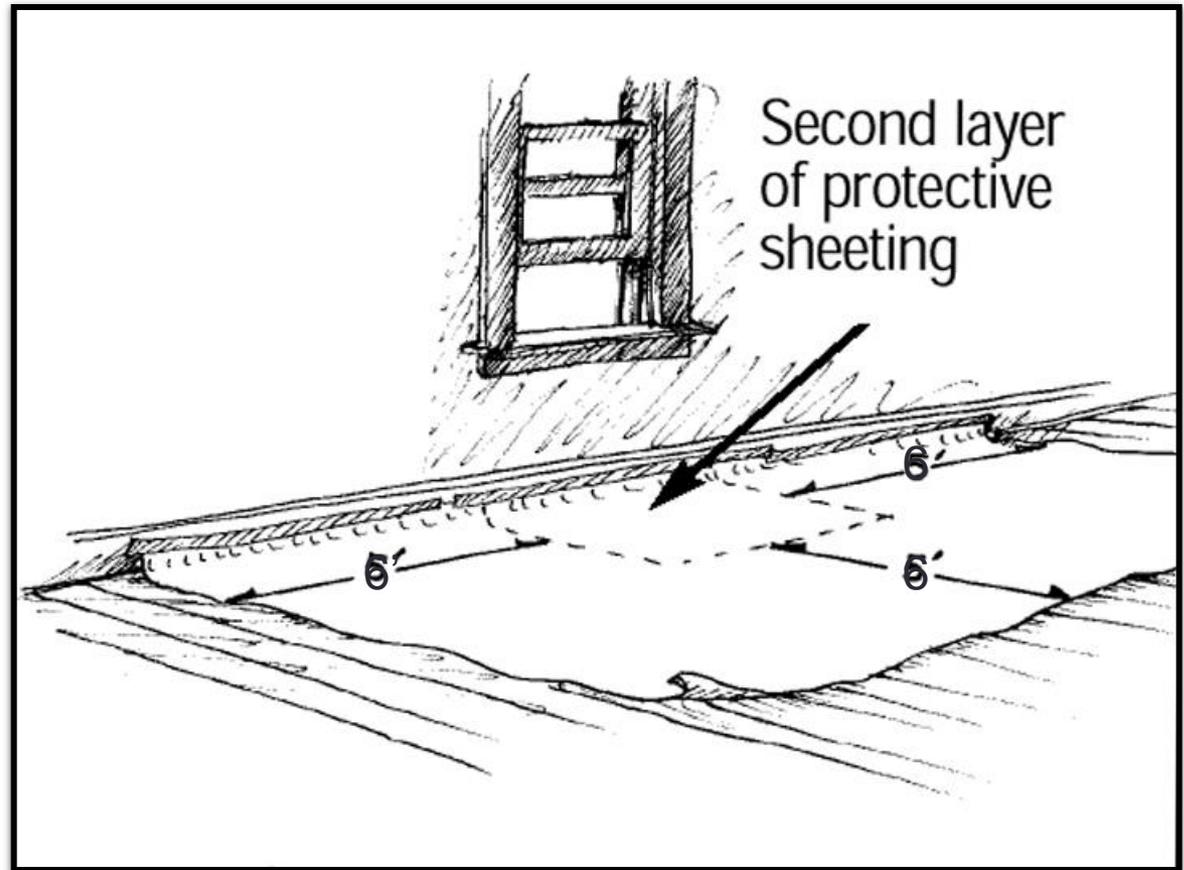
At a minimum, this may include ...

- Use of hand tools.
- Working wet (water mist or foam).
- Shrouded power tools.
- “Bubble dust bags.”
- Catchment poly bags.
- Placing polyethylene sheeting immediately below the work area.

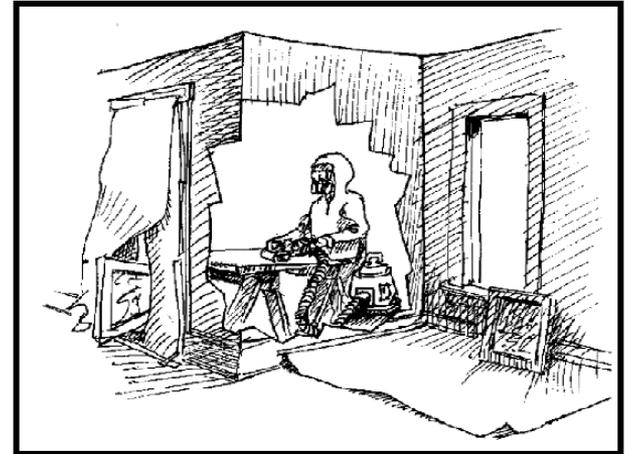
INTERIOR CONTAINMENT

Minimum Level 2 Containment Interior

- Extend Poly 6' from the work zone
- Secure in place with tape



Sometimes Vertical Containment May Be Required



**Expansion rods and poly -
creating containment
wall or room.**

Any vents contained in the work area
must be sealed off



Furniture should be removed from the
work area. Any immovable furniture
must be covered in poly

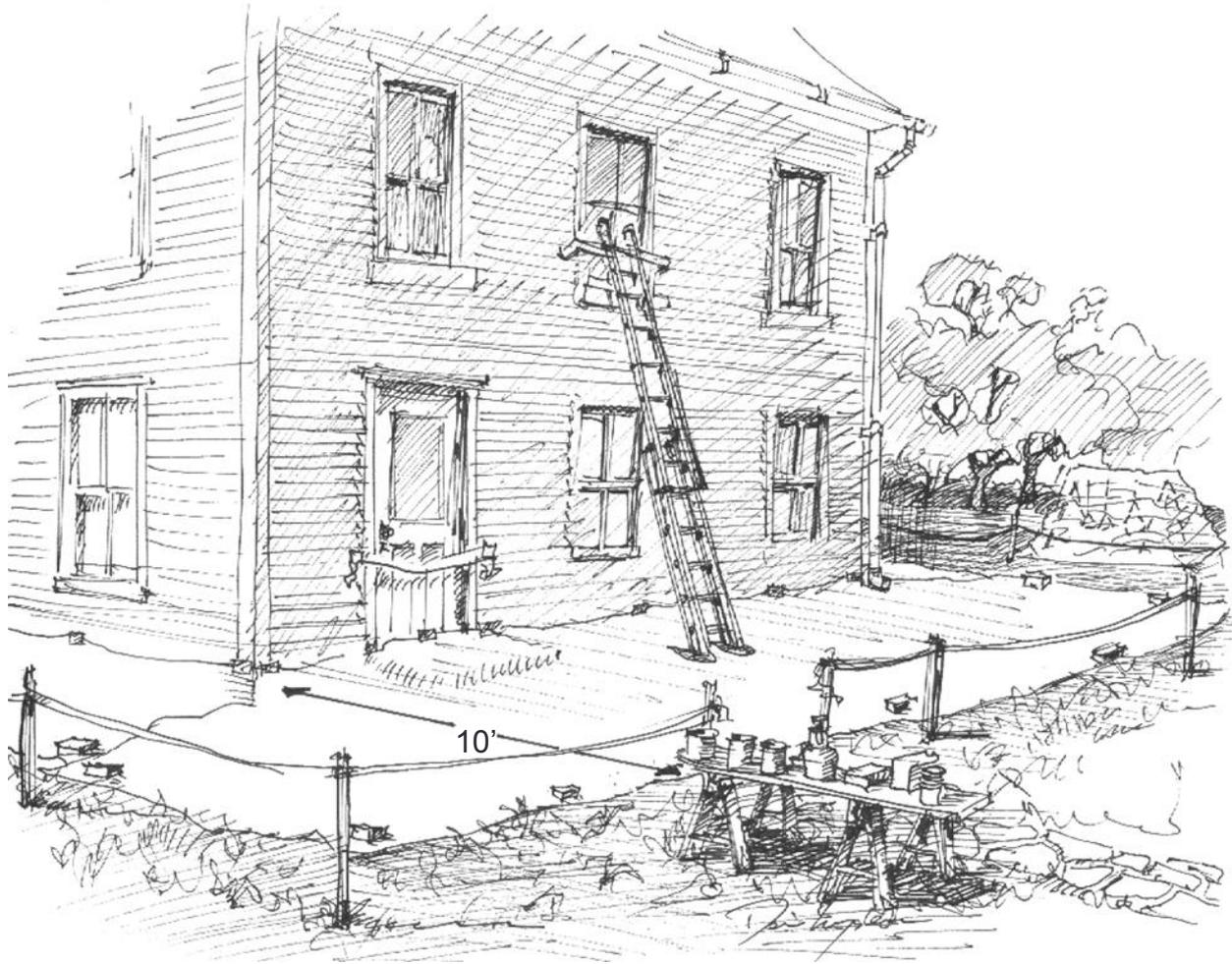
EXTERIOR CONTAINMENT



Photo documentation should show signs and caution tape

20 feet from work zone

Poly Cover Must extend at least 10' from the work area



Minimum containment: Inclement weather may require more extensive containment



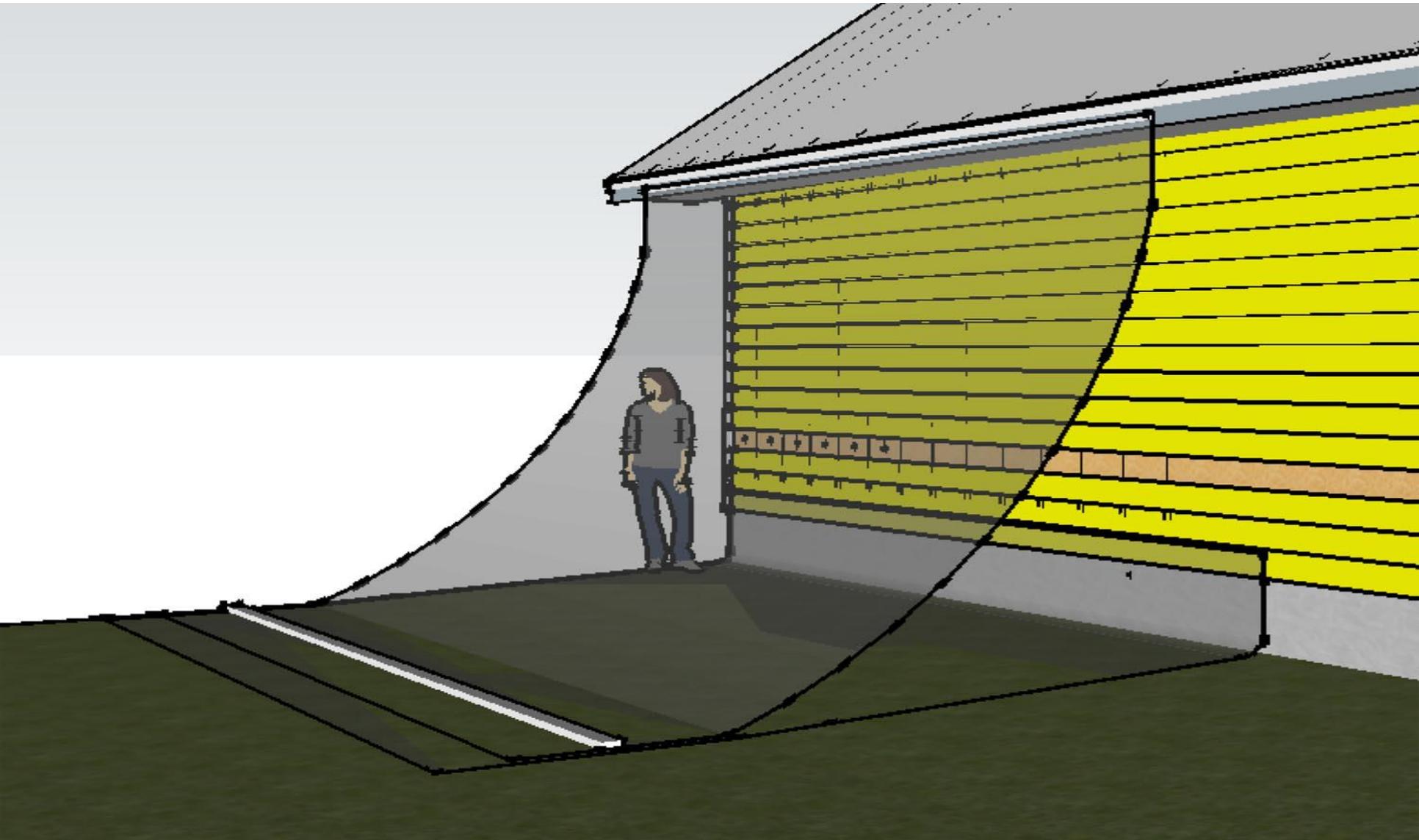
LSW requires that Windows and doors contained in or within 20' of the containment area must be sealed. LRRP requires windows only be closed.

If 10 feet of containment cannot be achieved, vertical containment is required.

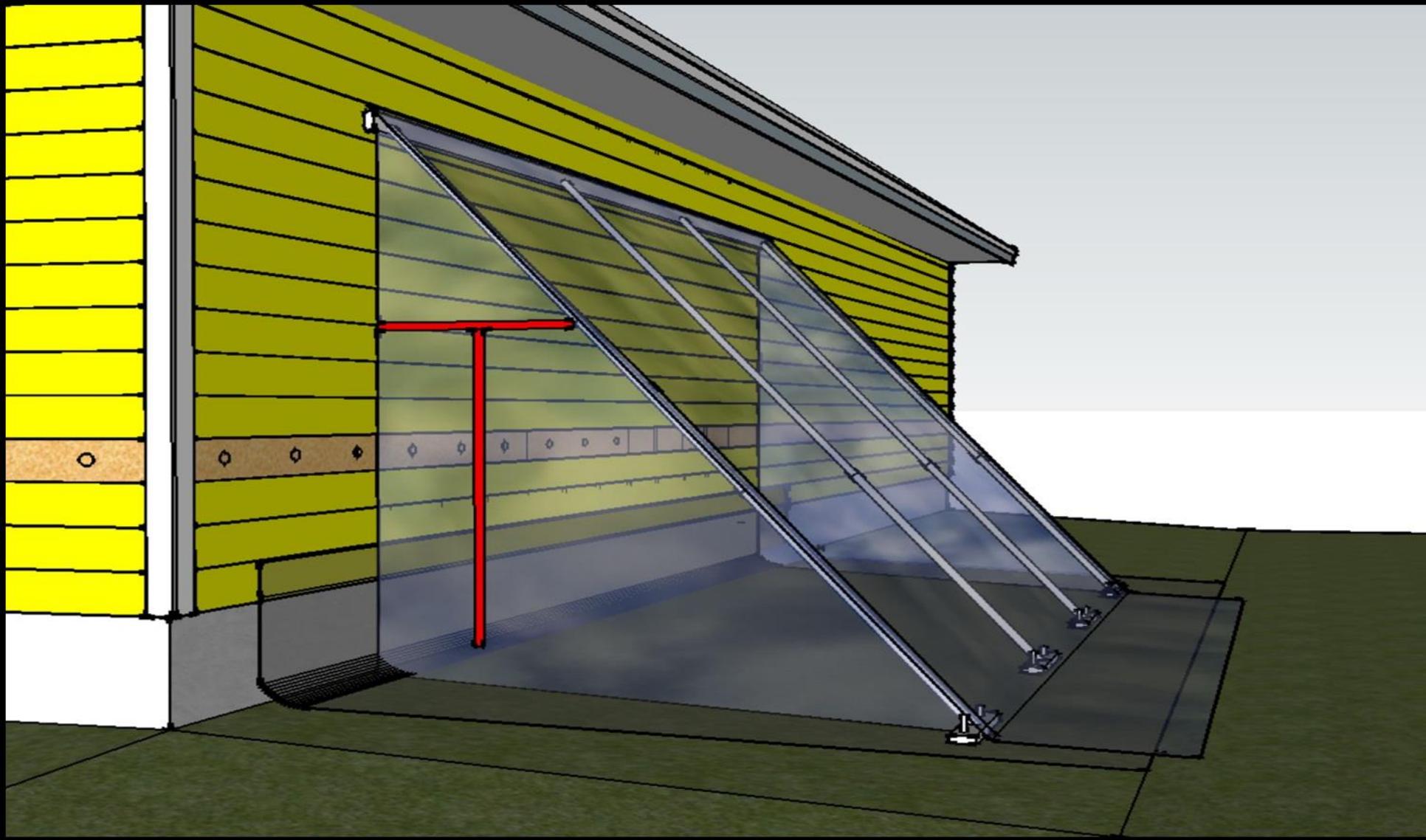
Drape poly from eave.

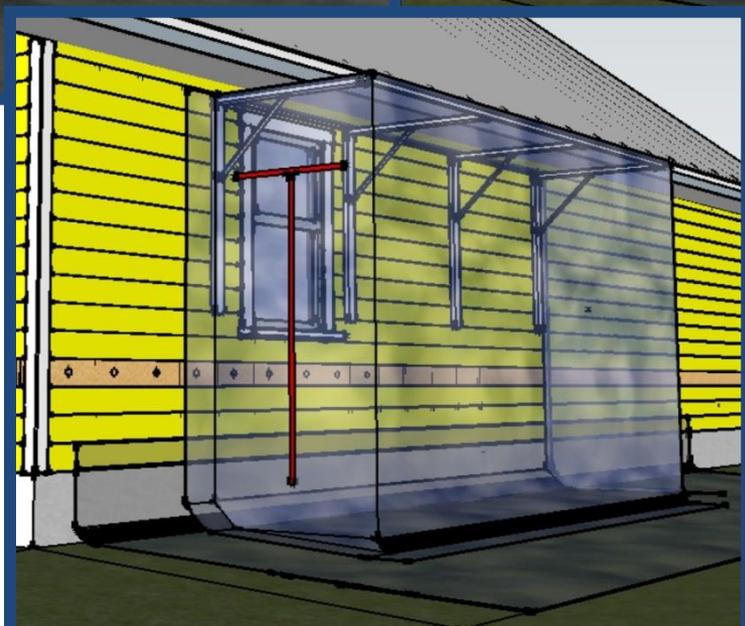
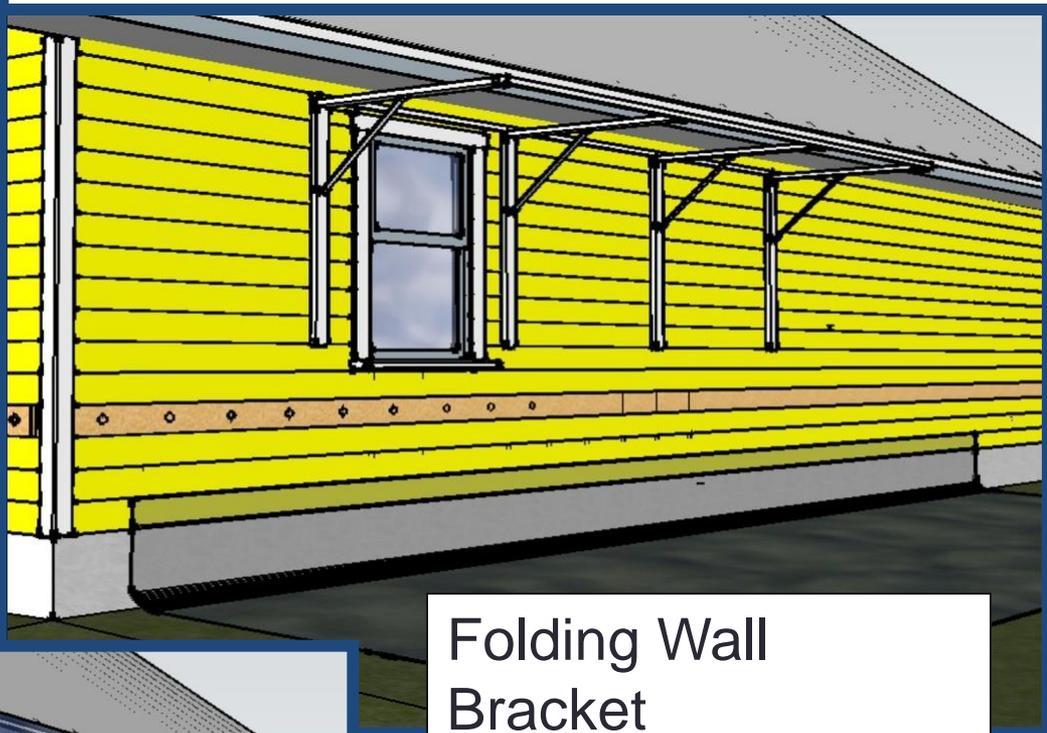


Drape Containment From the Eave



Lean- to containment using extension rods or 2 x 4 lumber





Folding Wall
Bracket
Containment:

- Single.
- Multiple.
- Finished with Sheeting.

Exterior Catchment Trough



Exterior LSW Containment.
LRRP does not address
this type of containment



LSW/LRRP Documentation Must Include:

- Notification of receipt of “Renovate Right” pamphlet within 60 days of work start
- Completed Renovator Checklist (If LSW/LRRP containment is required)
- Confirmation that the completed renovators checklist and any testing results were given to the client within 30 days (If not contained in the renovators checklist)
- Training records if non-certified workers are listed
- Testing kit documentation form if testing is performed

LSW/LRRP Documentation Must Include:

- Photo documentation of testing and containment (LSW requirement)
- Contractors Lead Based Paint Renovation License must be available for review
- Renovator Certificate(s) must be available for review

Required documentation for each weatherization job must be:

- Compiled by the certified renovator.
- Retained by the certified firm.
- Retained for 3 years with firm.

Lead Resources

- 12 Steps to Lead Safety: This video details the differences between LSW and the LRRP rules
<http://wxtvonline.org/2010/04/lead-safety/>
- Exterior Containment Video
<http://www.waptac.org/MediaModule/video/501/How-To-Be-Lead-Safe-Exterior-Containment.aspx>
- Interior Containment Video
<http://www.waptac.org/MediaModule/video/493/How-To-Be-Lead-Safe-Interior-Containment.aspx>

QUESTIONS?
