

Third Edition – Revised September 2016

**Summary of Georgia EPD's
Lead-Based Paint (LBP) Renovation,
Repair and Painting (RRP) Rules
For
Contractors, Property Managers, and Maintenance Personnel**



GEORGIA
DEPARTMENT OF NATURAL RESOURCES

ENVIRONMENTAL PROTECTION DIVISION

**Summary of Requirements from Georgia Lead-Based Paint Hazard
Management Rules, Chapter 391-3-24 and Federal 40 CFR 745**

Note: The requirements outlined in the State and Federal Rules always supersede the Summary technical guidance documents.

**Georgia Environmental Protection Division
Land Protection Branch
Lead-Based Paint and Asbestos Program
4244 International Parkway, Suite 104
Atlanta, Georgia 30354
Program Manager: Jennifer Vogel**

DUTY OFFICER LINE: (404) 363-7026

<http://epd.georgia.gov/lead-based-paint>

Summary of Georgia's Lead-Based Paint Renovation (RRP) Rule

Georgia-Specific Regulations are starred. ✨

“Lead-based paint (LBP)” means paint or other surface coatings that contain lead equal to or in excess of 1.0 milligram(s) per square centimeter (mg/cm²), or 0.5 percent (0.5%) by weight or 5000 parts per million (ppm).

Georgia's RRP Rules became effective on **December 9, 2010**. On July 5, 2011, Georgia became the 12th state to receive authorization from the United States Environmental Protection Agency (EPA) to administer and enforce EPA's Lead Renovation, Repair, and Painting (RRP) Program. The Georgia Environmental Protection Division – Lead-Based Paint and Asbestos Program is authorized to administer the federal RRP program in Georgia.

This summary of Georgia's RRP Program highlights the areas where Georgia is different from EPA. Please refer to the Georgia regulations and the Initial Renovator training course materials for more detailed information or request assistance from the Program Duty Officer at (404) 363-7026.

Georgia's RRP Rule Applies in the Following Circumstances:

The Georgia RRP Rule applies to the following renovation, repair and painting (RRP) work:

- Renovations completed for compensation;
- In residential houses and apartments built before 1978;
- In child-occupied facilities such as schools and daycare centers built before 1978;
- When disturbing more than 6 ft² of lead painted or coated surfaces per interior room;
or
- When disturbing more than 20 ft² of lead painted or coated surfaces on exteriors.
- When replacing windows of any size; or
- Partial demolitions of structures, walls, or components that are not entire structure demolitions.

✨ Georgia regulates child-occupied facilities that will be visited by the same child, six years of age or under, on at least two different days within the same week (Sunday through Saturday), provided each day's visit lasts at least three hours and the combined weekly visit lasts at least six hours.

Will the RRP Rule Impact My Business?

Potentially affected businesses include, but are not limited to:

- Construction and renovation work for compensation done in single-family, multi-family housing, and child-occupied facilities built before 1978 by the following entities:
 - Building construction contractors
 - Renovators
 - Specialty Trade Contractors
 - Window Replacement Contractors
 - Plumbers when disturbing painted surfaces
 - Heating and Air-Conditioning Contractors

- Painting and Wall Covering Contractors
- Electrical Contractors
- Finish Carpentry Contractors
- Drywall and Insulation Contractors
- Siding Contractors, Tile and Terrazzo Contractors
- Glass and Glazing Contractors
- Owners, Managers and Maintenance Personnel
 - Real Estate Leasers of Residential Buildings and Dwellings
 - Residential Property Owners and Managers
 - Child and Day Care Service Providers
 - Elementary Schools with Kindergarten and First Grade Classrooms
- Environmental Remediation Contractors
 - Asbestos Abatement Contractors
 - Mold Removal Contractors

What Housing or Activities are Excluded and Not Subject to the RRP Rule?

- Housing built in 1978 or more recently.
- Housing designated exclusively for elderly or disabled persons, unless children 6 years of age and under reside or are expected to reside there.
- Zero-bedroom dwellings (studio apartments, dormitories, etc.).
- Housing or components declared lead-free by a Georgia Certified Lead Inspector or Georgia Certified Lead Risk Assessor.
- Minor repair and maintenance activities that disturb 6 ft² or less of painted surfaces per room on the interior or 20 ft² or less on the exterior of a home or child-occupied facility (that do not involve window replacement or partial demolition).

Reminder: All window replacements of any size and all projects involving any sized partial demolition are subject to the RRP Rule. All prohibited work practices are NOT allowed on any renovation project of any size.

Work done by individuals in housing they own and occupy are not regulated under this rule.

Firm Certification



☀ All renovation firms that advertise, contract to perform, or perform RRP projects are required to be Georgia certified after December 9, 2010. Georgia EPD no longer recognizes EPA certifications and does not have reciprocity with EPA for certifications.

☀ The fee for Renovation Firm certification is either \$125 for 1 year or \$300 for 3 years. The firm chooses between these two certification periods.

In addition to filling out the Georgia Renovation Firm application form, the applicant must agree to employ a certified Renovator and/or a Dust Sampling Technician when conducting renovation activities.

When performing activities that disturb painted surfaces on behalf of the firm, workers must be either certified renovators or have been trained by a certified renovator. Detailed records of this training must be maintained for each job.

Renovator Certification and Requirements

☀ All Renovators/Supervisors are required to be Georgia Certified after December 9, 2010. Georgia EPD no longer recognizes EPA certifications and does not have reciprocity with EPA for certifications. Those receiving training after December 9, 2010 must become Georgia certified before working on a regulated RRP project.

☀ The fee for Renovator/Supervisor certification is \$150 for 3 years.

☀ The 8-Hour Initial Renovator Training is required for initial Georgia certification.

☀ Renewal certification is due 3 years after the last day of training. The 4-hour Refresher Renovator training course is required every 3 years after the initial training. Renovators who wish to renew their certification with refresher training must do so prior to 3 years from the initial training date.

☀ Renovators that do not complete the renovator refresher course prior to 3 years after the last day of training may obtain provisional certification for 12 months by payment of a fee two times the certification fee (\$300).

☀ Renovators that do not complete the renovator refresher course by four years after the last day of training must complete an initial renovator training course to be eligible for Georgia certification.

☀ Georgia EPD shall recognize the following training programs for certification purposes of attendees for the Renovator and Dust Sampling Technician courses:

- Training courses taught prior to May 31, 2011 by training providers accredited by the U.S. EPA or a U.S. EPA authorized state, tribe or territory;
- Training courses taught by training providers accredited by a state that has a written reciprocity agreement with Georgia EPD; and
- Training providers accredited by Georgia EPD after March 31, 2011.

Renovators agree to work for a Certified Renovation Firm when conducting renovation activities on pre-1978 target housing or child-occupied facilities; however, they do not need to be working for such a Certified Renovation Firm when applying for certification.

The image shows a form titled "Renovator or Dust Sampling Technician Application for Certification" from the Georgia Environmental Protection Division. The form includes sections for "Applicant Information" (Name, Address, City, State, Zip, Date of Birth, Gender, Height, Weight, Home Phone, Cell Phone, E-Mail), "Renovation Firm Information" (Firm Name, Address, City, State, Zip, Phone, Fax, Website, Georgia Certification Number, Expiration Date), and "Renovator or Dust Sampling Technician Training Information" (Accredited Training Provider, Course(s) Taken, Initial or Refresher, Last Date of Course). There is a warning box about falsifying information and a signature line at the bottom.

The Certified Renovator must be onsite during certain phases of the work and perform the following:

- Ensure full compliance with the Rules.
- Have at the work site, copies of their Georgia Renovation Firm and Renovator Certifications, their initial course completion certificate and any subsequent renewal Certificates;
- Conduct testing of surfaces in the project area to determine the presence or absence of lead-based paint or coatings;
- Train and document the training of workers of site- specific lead-safe work practices.
- Post Warning Signs;
- Establish work area containments;
- Be available by phone during all other stages of the project and must be able to be on the job site within one hour at all times while renovations are being conducted;
- Conduct final cleanup and cleaning verification; and
- Prepare and maintain project records required by the Rules.



Dust Sampling Technician Certification and Requirements

☀ All Dust Sampling Technicians are required to be Georgia certified after December 9, 2010. Georgia EPD no longer recognizes EPA certifications and does not have reciprocity with EPA for certifications.

- ☀ The fee for Dust Sampling Technician certification is \$150 for 1 year or \$275 for 2 years.
- ☀ The 8-Hour Initial Dust Sampling Technician Training is required for initial Georgia certification.
- ☀ The 4-hour Refresher Dust Sampling Technician training course is required every 2 years after the initial training.
- ☀ Renewal certification is due either after 1 or 2 years depending on the initial fee paid or after the last day of training, whichever is earlier.
- ☀ Georgia EPD shall recognize the following training programs for certification purposes of attendees for the Renovator and Dust Sampling Technician courses:

- Training courses taught prior to May 31, 2011 by training providers accredited by the U.S. EPA or a U.S. EPA authorized state, tribe or territory,
- Training courses taught by training providers accredited by a state that has a written reciprocity agreement with Georgia EPD, and
- Training providers accredited by Georgia EPD after March 31, 2011.

Dust Sampling Technicians agree to work for a Certified Renovation Firm when conducting dust sampling in pre-1978 target housing or child-occupied facilities; however, they do not need to be working for a Certified Renovation Firm when applying for certification.

Pre-Renovation Education Requirements

Renovators are required to distribute the EPA *Renovate Right* pamphlet before starting renovation work to the following persons:

- Owner and occupants in target housing
- ☀ Owner of child-occupied facility and the operator, manager or management representative. In Georgia pre-renovation information must be provided to an owner and manager not an adult representative.

For work in common areas of multi-family housing or child-occupied facilities, the Renovation Firm must distribute renovation notices to tenants or parents/guardians of the children attending the child-occupied facility or the Renovation Firm must post informational signs about the renovation or repair job, along with a copy of the *Renovate Right* pamphlet.



For all work in target housing or child-occupied facilities, informational signs must:

- Be posted where they will be seen;
- Describe the nature, locations, and dates of the renovation; and
- Be in the primary language of the occupants.

Obtain confirmation of receipt of the *Renovate Right* pamphlet or a certificate of mailing prior to beginning work.

☀ In Georgia, a certificate of mailing may be from the post office, or any package or letter carrier as long as proof of mailing and proof of delivery can be provided.

Retain the records for a minimum of 3 years.

Note: *Renovate Right* pamphlet distribution requirements do not apply to emergency renovations.

Summary of Work Practices

Firms must establish a regulated work area and post signs clearly defining the work area and warning occupants and other persons not involved in renovation activities to remain outside of the work area. These signs should be in the primary language of the occupants. At sites where residents speak several different languages, signs with multiple translations should be used when possible.

Prior to the renovations, the firm must isolate and contain the work area so that no dust or debris leaves the work area while the renovation is being performed.

Safety for Your Workers

- Select, Issue, and Supervise the Use of Appropriate Personal Protective Equipment.
 - Ensure your workers have appropriate eyewear, clothing, and respiratory protection for the job.
 - Do not allow any eating, drinking, or smoking in the work area.



Interior Work Practices

- Remove all objects from the work area or cover with plastic sheeting that has all seams and edges taped and sealed.
- Close and cover all HVAC ducts and vents in the work area with taped edges of plastic sheeting or magnetic covers.
- Close windows and doors in the work area. Ensure that doors within the work area that will be used while the job is being performed are covered with plastic sheeting in a manner that allows workers to pass through while confining dust and debris to the work area.
- Cover the floor area with taped down plastic sheeting in the work area extending a minimum of 6 feet beyond the work area or a sufficient distance, whichever is greater, to collect falling dust and paint debris.

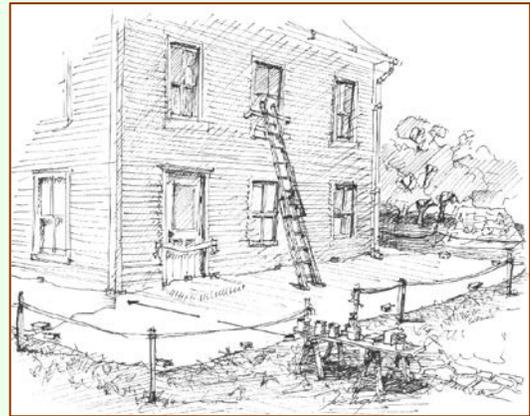


Prohibited Work Practices

- Open-flame burning or torching of lead-based paint;
- Use of machines that remove lead-based paint through high speed operations such as sanding, grinding, using a power plane, abrasive blasting, or sandblasting, unless such machines are used with HEPA exhaust control; and
- Operating a heat gun over 1100⁰ F to remove lead-based paint.

Exterior Work Practices

- Close all doors and windows within 20 feet of the renovation.
- Ensure that doors within the work area that will be used while the job is being performed are covered with plastic sheeting in a manner that allows workers to pass through while confining dust and debris.
- Cover the ground with plastic sheeting or other disposable impermeable material extending a minimum of 10 feet beyond the perimeter or a sufficient distance to collect falling paint debris, whichever is greater.



In situations, such as where work areas are in close proximity to other buildings, or under windy conditions, the renovation firm must take extra precautions in containing the dust and paint debris. Vertical containment may be necessary to containing the dust and paint debris in the work area.

Minimize the Dust:

- Mist areas before sanding, scraping, drilling, cutting or demolishing.
- Score paint before separating components. Pry and pull apart components instead of pounding and hammering.
- Always use a shroud or hood attachment with the HEPA vacuum when using power tools and equipment.

After the renovation has been completed, the firm must clean the work area until no dust, debris or residue remains.

Waste Disposal Requirements

Waste from renovation activities must be contained for storage or disposal to prevent releases of dust and debris from the work area.

On a daily basis at the conclusion of each workday and at the conclusion of the renovation, waste that has been collected from renovation activities must be stored in a secured container at the jobsite or removed from the jobsite to prevent access to and the release of dust and debris.



Put lead-containing trash and debris in heavy-duty plastic bag and seal it. Wrap waste building components, such as windows, doors, and trim, in heavy plastic sheeting and tape shut.

Lead-containing waste from a residential site may be disposed as household waste in a municipal solid waste landfill. Lead-containing waste from a non-residential site must be evaluated for hazardous waste determinations.

Cleaning and Cleaning Verification Requirements

The firm must collect all paint chips and debris, and seal it in a heavy-duty bag.

Remove and dispose of protective sheeting as waste. Mist the protective sheeting with water, fold dirty side in, wrap, tape shut, and dispose in a heavy-duty bag or secured container.

Ensure that everything, including tools, equipment, and workers are free of dust and debris before leaving the work area.

Additional Interior Work Area Cleaning Requirements:

- HEPA vacuum all surfaces, including walls, an additional 2 feet from the work area. Start at the ceiling and work down to the floor. Thoroughly vacuum all remaining surfaces and objects in the work area including countertops.
- Wash the work area with general purpose cleaner and damp cloths. Mop or wet clean uncarpeted floors using a series of wet wipes or a mopping method that keeps the wastewater separate from the rinse water or use a wet mopping system.



☀ Wash the windowsills and window troughs in the work area with general purpose cleaner and damp cloths. Use a wet cleaning method that keeps the wastewater separate from the rinse water. Georgia requires that window troughs be cleaned and reach cleaning verification requirements.

Keep detailed records of the post work cleaning and cleaning verification procedures used or clearance sampling results. It is suggested that you keep photographic evidence of the visual inspection and interior cleaning verification results and if used, a copy of the clearance report.

Interior Work Cleaning Verification

- Dust Clearance Method – not required but may be used in lieu of cleaning verification.
 - A Georgia Certified Lead Dust Sampling Technician or Georgia Certified Lead Inspector performs clearance samples after the work area has passed visual clearance by collecting dust wipe sampling and sending the samples to an approved laboratory for analysis. If the samples meet lead clearance levels, the Certified Renovator has proof that lead contamination was not left behind in the work area.
 - A copy of the results must be provided to the owner/occupant. If clearance was not met, the Certified Renovator must re-clean and the Lead Inspector or Lead Dust Sampling Technician must retest until clearance standards are reached. Documentation of the re-cleaning and additional sampling must be a part of the project records.
- Cleaning Verification Method performed by a Georgia Certified Renovator– required if dust clearance method not used
 - After the work area has passed visual clearance and interior cleaning has been completed, verify cleaning by performing the following procedures:
 - Wipe all uncarpeted floors, countertops, windowsills and window troughs in the work using wet disposable cleaning cloths.
 - Compare each cloth with the cleaning verification card and document your findings.
 - If the wipe is the same or lighter than the cleaning verification card; the work area is sufficiently clean and the project is complete.
 - If the wipe is darker than the cleaning verification card, one must re-clean using a wet disposal cleaning cloth and compare the cloth to the cleaning verification card.
 - If the wipe is darker than the cleaning verification card, one must re-clean using a dry disposal cleaning cloth.
 - Document the cleaning verification.

Exterior Work Cleaning Verification

- After performing the required post work cleaning, the Certified Renovator must perform a visual inspection and look for paint chips, dust, debris, or residue. Re-clean if visual inspection is not met. Document that cleaning was completed.

Recordkeeping Requirements

Provide a copy of the required project records to the owner/occupant and retain the records in the project file for 3 years.

Retain all records in the project file to show compliance for a minimum of 3 years following completion of the renovation including, but not limited to, the following requirements:

- Copies of certifications for the Renovation Firm and certified individuals,
- Copies of training certificates for the Renovator and/or Dust Sampling Technician,
- Test results including the type of testing kit used and components tested or an inspection report from a Georgia Certified Lead Inspector,
- Pre-renovation education requirements,
- On-the-job training requirements for worker including site-specific work practices used,
- Work practice requirements, and
- Post work cleaning, cleaning verification or clearance sampling results.

For Additional Information

For more information including a project inspection checklist 'Renovation Site Inspection Report Checklist' and 'Georgia RRP Recordkeeping Forms' package, visit the Georgia Environmental Protection Division's website at <http://epd.georgia.gov/lead-based-paint> or call the Lead-Based Paint and Asbestos Program at (404) 362-7026.

