



Understanding what RRP means for Ohio & Lead Poisoning Prevention

Question: What is RRP?

Answer: RRP stands for the U.S. EPA's Renovation, Repair and Painting Rule.

The RRP Rule sets forth procedures for the use of lead-safe practices during renovation activities. The aim of the rule is to reduce lead hazards and lead exposure of residents that can be generated by work conducted by untrained and uncertified contractors. Currently, Ohio's RRP is managed at the federal level by the U.S. Environmental Protection Agency (USEPA).

Q: Are abatement and RRP the same thing?

A: No but it can be confusing.

Abatement consists of activities specifically designed to address lead in the home. These activities include lead-based paint inspections, risk assessments, replacement of lead painted components, and lead-based paint removal. Abatement projects are typically designed to permanently eliminate lead-paint hazards.

RRP projects are common renovation, repair, and painting activities (like sanding, cutting, replacing windows, and more) that disturb lead-based paint during the renovation. RRP activities often involve minor repairs or aesthetic changes that can create new lead hazards and are not designed to permanently eliminate lead hazards. Both RRP workers and abatement workers need to be certified for their specific activities and roles and are currently regulated by different organizations.

Q: Does the RRP rule apply to ANY home renovation?

A: No.

The unit must have been built prior to 1978. The renovation must be paint disturbing and performed for compensation. The rule applies to work in houses, apartments, and child-occupied facilities (like day care centers) built before 1978 when the renovation covers more than 6 square feet inside (20 square feet outside), involves window replacement, or is a partial or full demolition activity regardless of square footage. Renovations might include remodeling and repair or maintenance, painting preparation and carpentry. The RRP rule also does not apply to properties where the paint has been tested and found not to be lead-based.

Q: Is RRP only for renovation activities?

A: No.

The RRP rule also includes pre-renovation requirements like training, firm certification, and work practice requirements.

Q: If I am doing a repair job myself in my own pre-1978 home, do I have to follow RRP?

A: No.

Renovations in your own home do not fall under the US EPA RRP rule. But home repairs might create lead hazards, like dust or paint chips, that are enough to poison your child and put your family at risk. For suggestions on safe renovation practices, visit <https://www.epa.gov/lead/renovation-repair-and-painting-program-do-it-yourselfers>. If you would like to hire someone who is certified to complete the renovation, search at <https://cfpub.epa.gov/flpp/pub/index.cfm?do=main.firmSearch>

Q: Does any kind of worker doing for-hire renovation in a pre-1978 home or daycare have to be RRP-certified?

A: Yes.

In general, anyone who is paid to perform work that disturbs paint in pre-1978 homes or daycares built must be certified. This includes all firms, even sole proprietorships, such as residential rental property owners/managers, general contractors, and special trade contractors (like painters, plumbers, carpenters, and electricians). Firms must also ensure that anyone performing activities on their behalf are certified renovators or have been trained by a certified renovator. A certified renovator needs to be assigned to each renovation to perform their responsibilities.

Q: I operate a child-care in a pre-1978 facility. Do I need to be certified?

A: Depends.

If you or your employees conduct renovation, repair or painting activities, then you must become a lead-safe certified firm and your employees who conduct those activities must become trained and certified renovators. If you or your employees do not conduct those activities, then you need to hire a lead-safe certified firm for building maintenance, renovation, repair, or painting activities that could disturb lead-based paint.

Q: I am a property owner/manager for a pre-1978 rental unit. Do I need to be certified?

A: Depends.

If you or your employees conduct renovation, repair or painting activities, then you must become a lead-safe certified firm and your employees who conduct those activities must become trained and certified renovators. If you or your employees do not conduct those activities, then you need to hire a lead-safe certified firm for building maintenance, renovation, repair, or painting activities that could disturb lead-based paint.

Q: My school district operates buildings that would fall under the child occupied facility designation. Do we need to become certified?

A: Depends.

If you or your employees conduct renovation, repair or painting activities, then you must become a lead-safe certified firm and your employees who conduct those activities must become trained and certified renovators. If you or your employees do not conduct those activities, then you need to hire a lead-safe certified firm for building maintenance, renovation, repair, or painting activities that could disturb lead-based paint.

Q: Is there a problem with how RRP currently operates in Ohio?

A: Yes.

RRP is currently managed federally by the U.S. Environmental Protection Agency (USEPA), limiting the rule's effectiveness in Ohio and continuing to place children at risk of lead exposure during common renovations in pre-1978 homes, daycare centers and schools. Transferring management of the RRP to the Ohio Department of Health (ODH) will ensure effective implementation and prevent lead poisoning.

Q: If RRP is transferred to ODH, does this benefit Ohio's lead workers?

A: Yes.

This will increase the support for the local lead workforce. ODH has a strong track record of working with lead workers to provide training and guidance on lead safe practices. Workers will be able to directly contact state-staff with questions. More timely answers will be sensitive to local and state needs, reducing confusion and supporting effective lead practices across the state. Potential enforcement penalties are more equitable, and significantly lower than the US EPA's current fines. Based on ODH's compliance assistance philosophy, fines and penalties are only used after other corrective measures have been exhausted. Additionally, the ODH has experience administering regulatory programs and has established partnerships with other local, state, and regional entities that can provide comprehensive support to lead workers.

Q: Will this change cost me more money?

A: Perhaps.

That's a short question with a long answer. For consumers, transferring RRP authority from the federal level to the state level should have no appreciable impact. Contractors are currently required to follow the RRP regulation and should have adjusted their charges appropriately. As such, contractors currently following the federal RRP regulation should not see significant financial hardships. However, contractors that have chosen to ignore the RRP regulation will undoubtedly feel some impact and have some complaints of financial hardship. To what degree is difficult to say. There are training, certification, and "additional" safety practices included in compliance with the regulation. That being said, the "additional" safety practices are generally recognized good construction practices.

Q: If RRP is transferred to ODH, does this benefit Ohio's children & families?

A: Yes.

Individuals living in Ohio will receive lead services that are safe, effective, and sensitive to community and state needs. Lead prevention efforts will be prioritized, improving child health and well-being across the state. Ohio citizens will also have access to educational resources and the ability to make complaints that will be followed up in a timely manner by state-staff.

Q: If RRP is transferred to ODH, does this benefit Ohio fiscally?

A: Yes.

All monies collected through the RRP that currently are directed to the USEPA would instead remain in Ohio. Funding could be used to support lead worker training and certification as well as public education for lead poisoning prevention.

Q: If RRP is transferred to ODH, does this support lead poisoning prevention?

A: Yes.

Reducing lead dust and paint chips during renovation and repair of pre-1978 homes and other structures will help to keep children living or playing there safe from lead. The lead safe work practices required by RRP provides a strong foundation on which to build a primary prevention approach to child lead poisoning.