

RENOVATION, REMODELING, AND REPAINTING RULE (RRP) AMENDMENTS TO 641—CHAPTER 70 FREQUENTLY ASKED QUESTIONS

Overview

Renovation can disturb paint. This includes sanding, scraping, cutting, and demolition. Renovation in pre-1978 buildings can create lead dust and chips that can harm adults and children. In 2008, the U.S. Environmental Protection Agency (EPA) issued rules for renovation. They apply to renovation in pre-1978 housing (target housing). They also apply to pre-1978 child occupied facilities (daycare centers, kindergartens). Beginning on April 22, 2010, renovators across the nation were required to certify to work in target housing. They were also required to follow lead-safe work practices. The Iowa Department of Inspections, Appeals, & Licensing (DIAL) is authorized by EPA to administer these rules in Iowa. These certified people are called “lead-safe renovators.”

What buildings are covered by the rule?

- **Target housing:** Housing built before 1978.
- **Child-occupied facilities:** Home daycares, daycare centers, preschools, kindergarten classrooms, or other buildings built before 1978.

What activities are covered by the rules?

Any work that disturbs painted surfaces in pre-1978 homes and child-occupied facilities.

Some examples are:

- Removing painted components such as doors and windows.
- Repairing a painted surface or preparing it for repainting.
- Replacing windows.
- Removing walls and ceilings.

Who must comply with the rules?

Anyone who disturbs paint in target housing and child-occupied facilities. This includes:

- Renovation and remodeling contractors.
- Contractors who replace windows and doors.
- Rental property owners.
- Property Management Companies (PMCs).
- Maintenance workers.
- Painters.
- Some plumbers and electricians.

How do I comply with the rule?

Contractors must take an approved 8-hour lead-safe renovator course to certify. If you already took an approved lead-safe work practices course, you can take a 4-hour refresher course online. After you take a class, you must apply for certification with the State of Iowa.

How does my company comply with the rule?

Companies that conduct renovation must be certified as a lead-safe renovator firm. You must assign at least one certified lead-safe renovator to each job. The certified lead-safe renovator must train other uncertified workers on each job. Workers must use lead-safe work practices. There is no fee for firm certification.

What actions must renovators take for each project?

The certified lead-safe renovator must assure that:

- Signs warn occupants not to enter the work area.
- Dust and debris are contained to the work area.
- Waste material is contained, stored, and transported safely.
- Prohibited work practices are not used.
- The work area is cleaned.
- The work area passes postrenovation cleaning verification or clearance testing with dust samples.
- Complete and maintain records about the project.

Are there exceptions to the rule?

The rule does not apply to:

- **Lead abatement.** Lead abatement conducted by a certified lead abatement contractor.
- **Surfaces where there is no lead-based paint.** Surfaces tested and determined not to be painted with lead-based paint are exempt from the lead safe work practices. However, testing surfaces for lead-based paint requires documentation and certification.
- **Owner-occupant.** A property owner can do work in a property where the person or immediate family lives.
- **Minor repair or maintenance activities:** Activities that disturb less than the established minimum areas. The minimum area for minor repair and maintenance activities is:

1. Less than 1.0 square foot of an interior painted or finished wood surface per renovation; or
2. Less than 6.0 square feet of a painted or finished drywall or plaster surface per room; or
3. Less than 20.0 square feet of an exterior painted or finished surface per renovation.

Are there extra requirements for lead-poisoned children?

Work must be done immediately for an elevated blood lead (EBL) child. Work performed in response to an EBL inspection must pass clearance testing. This must be done by an EBL inspector/risk assessor. Postrenovation cleaning verification cannot be used. People who perform this work are initially exempt from certification. However, they must be certified within six months of the EBL inspection. They can be certified as a lead safe renovator, lead abatement worker, or lead abatement contractor.

Do I still have to comply with the prerenovation notification rule if I am a certified lead-safe renovator?

Yes, this rule has not changed. Contractors must notify the owner and occupants when they disturb paint in target housing and child-occupied facilities.

Will Iowa accept lead-safe renovator training from other jurisdictions?

Yes, however certification with the State of Iowa is still required. Individuals certified in other states or with the EPA can get certified in Iowa without taking additional training in Iowa. Contact the Lead Professional Certification Program at lead.bureau@idph.iowa.gov for an application for reciprocal certification.

Where can I get additional information?

Visit the Lead Professional Certification Program website at <https://dial.iowa.gov/licenses/building/lead>.