

Lead-Safe Work Practices for the Renovation, Repair & Painting Industry



**Briefing for the
Administrator**

June 16, 2005



Purpose of Briefing

- Discuss options for reducing the risks to children from renovation, repair and painting in homes with lead-based paint.
- Review status of comprehensive program for the renovation, repair, and painting program.



Lead Hazards

- Lead poisoning remains a major environmental health hazard especially for children under age 6.
 - 310,000 children exceed 10 µg/dl blood lead, the CDC level of concern.
 - Minority, inner-city, and low income children are at greatest risk.
 - Any child can become lead-poisoned.
- Since the 1980s, lead has been phased out of gasoline, reduced in drinking water and industrial air pollution, and banned or limited in consumer products, including residential paint (1978).
- In spite of these efforts, significant sources remain including lead-based paint, lead-contaminated dust, and lead-contaminated soil.
- Federal Government goal: eliminate childhood lead poisoning by 2010.

June 16, 2005

Internal and Deliberative

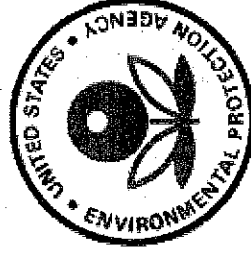
Strategy to Achieve 2010 Goal

- Multi-faceted approach to eliminate childhood lead poisoning and to maintain goal
 - ✓ Hazard Standards
 - ✓ Trained workforce and work practice standards for abatement
 - ✓ Real estate disclosure
 - ✓ Pre-renovation education
 - Targeting efforts to reach children most at risk
 - ✓ Outreach and education on the hazards of lead
 - ✓ Grants for "hot spots" and vulnerable populations
 - Comprehensive program for renovation, repair and painting industry

Statutory Mandate

- The Residential Lead-Based Paint Hazard Reduction Act of 1992 (Title X) is a roadmap for Federal response to lead poisoning. It assigns responsibility for actions to various Federal agencies.
- Title X directed EPA, among other things, to develop regulations to address abatement & renovation activities.

NIOSH



OSHA

Statutory Mandate

- For abatement:
 - ✓ Certify contractors.
 - ✓ Accredited training providers.
 - ✓ Develop work practice standards.
 - ✓ Allow State program authorization.
 - ✓ Final rule published on August 29, 1996.
- For renovation, repair and painting activities:
 - ✓ Establish guidelines for the conduct of renovation (September 1997).
 - ✓ Study hazards from renovation tasks (January 2000).
 - Revise the abatement regulations to apply to renovation activities that create lead hazards by October 26, 1996.

Renovation Study Results

- Typical renovation activities produce hazardous quantities of lead dust.
- Typical cleanup methods (broom and shop vacuum) are not effective at eliminating lead dust hazards.
- There is a relationship between renovation and elevations in children's blood lead levels.

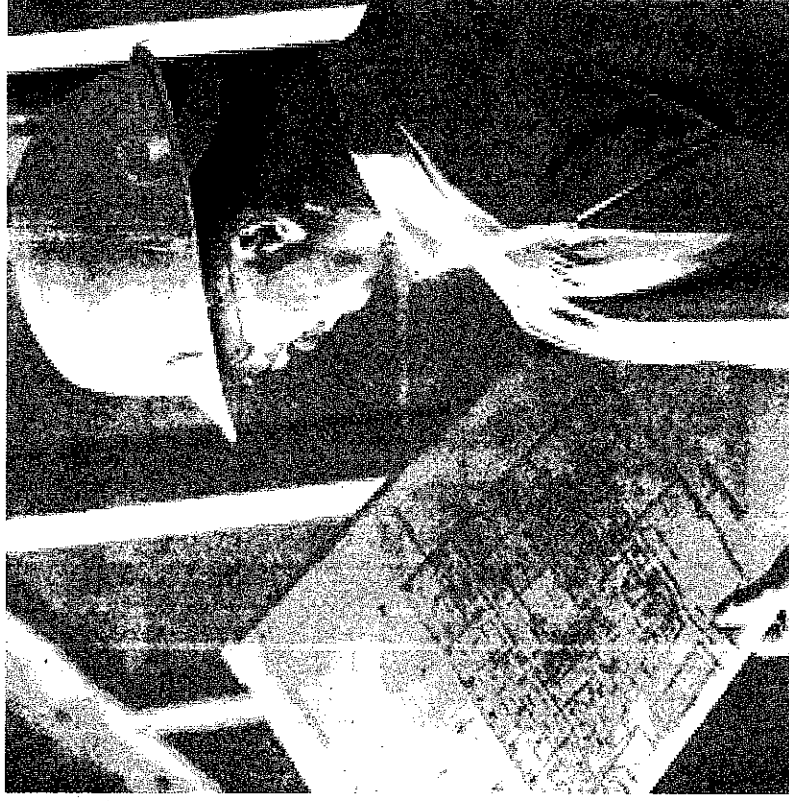


June 16, 2005

Internal and Deliberative

Renovation, Repair and Painting Industry

- 250,000 businesses
- 99% are small businesses
- 1.7 million employees
- 20 million renovation, repair and painting events annually in homes built before 1978. 7.7 million of those events occur in homes with lead-based paint



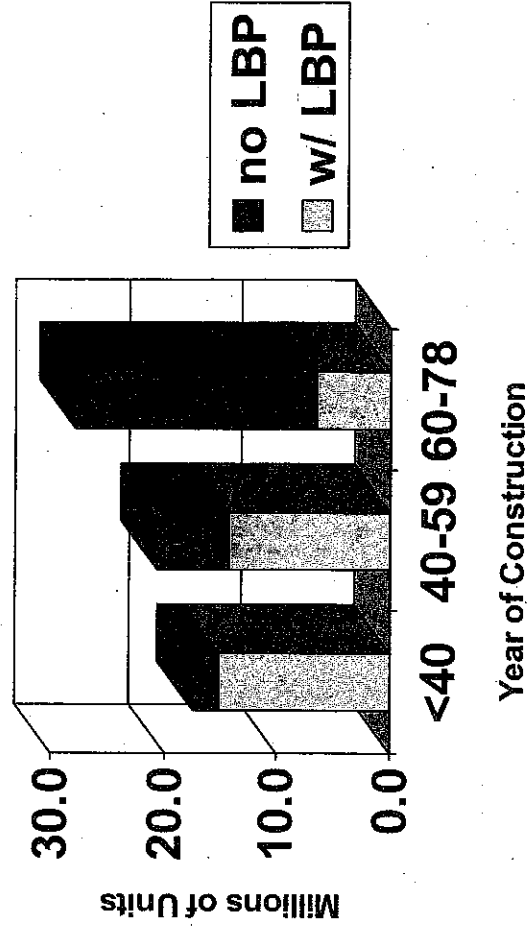
June 16, 2005

Internal and Deliberative

Homes with Lead-Based Paint

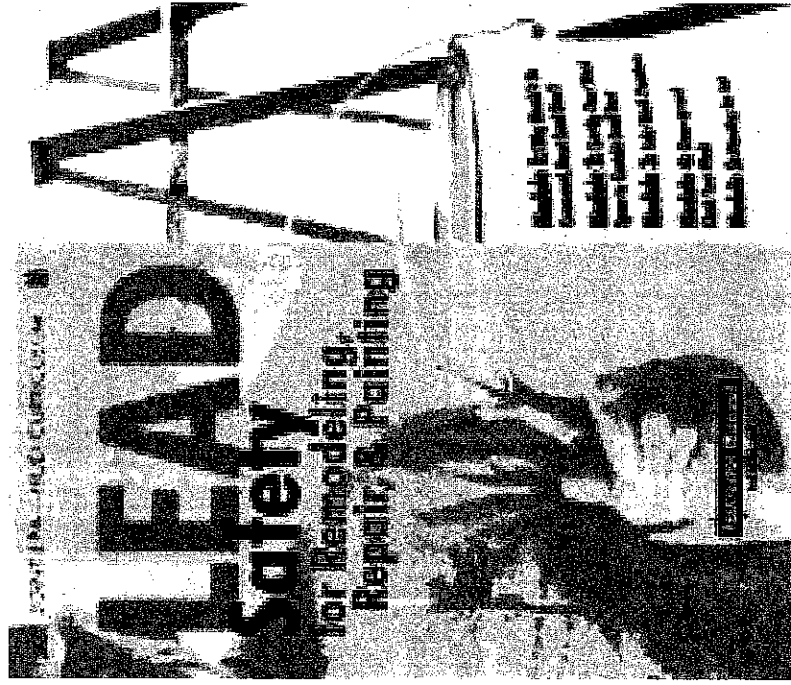
- Older homes are more likely to contain LBP.
- Of 96 million homes in the U.S., 66 million were constructed before 1978.
- 54% of homes built prior to 1978 contain some LBP (36 million units):

Prevalence of LBP in Homes by
Year of Construction



Work to Date on Renovation

- Developed options for a renovation regulation.
 - Draft economic analysis
 - Extensive stakeholder consultation including SBREFA panel and public meetings
- Developed w/HUD a Lead Safe Work Practices training course.
 - Currently used by HUD as part of their Lead Safe Housing Rule
- Evaluated a voluntary program for contractors to encourage the use of Lead Safe Work Practices.

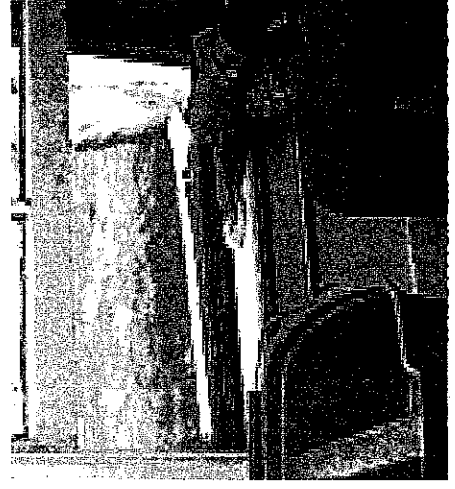


June 16, 2005

Internal and Deliberative

Lead Safe Work Practices

- The use of Lead Safe Work Practices can prevent the introduction of new lead hazards. These practices involve:
 - Containing the work area.
 - Minimizing dust generation.
 - Properly cleaning the work space.
- How can EPA get contractors to adopt these simple practices?
- EPA has considered both regulatory and voluntary approaches.



June 16, 2005

five

Comprehensive Program

- Developing comprehensive program including regulation, education and outreach to ensure the use of Lead Safe Work Practices by this unique industry.
 - Targeting areas of greatest concern
- Education and outreach campaign will target both industry and consumers. The campaign roll out is planned during Lead Poisoning Prevention Week (week of October 24th). Elements include:
 - Renovation specific website
 - New renovation specific brochures
 - Trade show exhibit
 - Sponsorship of training courses

Regulatory Options

- The attached table includes the base option (considered during SBREFA) and three alternatives.
- The base option, option 1, and option 2 rely on training, containment and cleanup, while option 3 focuses on prohibiting specific activities.
- For each of the options, the incremental cost/event is relatively low but the number of events drives the overall cost of the program.

Benefits

- Lead safe work practices that focus on containment, dust minimization and clean-up can address these hazards ensuring that no new lead hazards will be left following the work.
- Benefits may be difficult to quantify because the incremental increase of blood lead levels due to renovation is not known.

Challenges

- Working with an industry that is comprised of 99% small businesses.
- Encouraging State program authorization.
- Creating consumer demand and acceptance.