



Institute for Environmental Education, Inc.

Shaping the Environment Through Education

16 Upton Drive • Wilmington, Massachusetts 01887
 978-658-5272 • FAX: 978-658-5435 • www.IEETrains.com



Training and Consulting Services and Products for the Environmental, Health and Safety Field

Differences between the different regulating agencies in regards to the Renovation (RRP) regulations

Topic	EPA	MA DOS	HUD	OSHA
Training Non-Certified Workers	Certified Renovator (CR) is allowed to train employees of the firm.	Certified Renovator is allowed to train employees of the firm.	All persons performing lead safe work practices must take training course.	Employer may train employees on OSHA lead in construction standard and respirators.
Contractor Certification	Application form plus a \$300 fee. Applies to Companies and Rental property owners. Good for 5 years	Application form plus a \$375 fee. Waiver form for companies that applied for the EPA certification before 7/9/2010 or for rental property owners. Good for 5 Years. <ul style="list-style-type: none"> • Must have workers comp if firm has employees. • Must submit medical and respiratory programs. • Owner or responsible person must attend the RRP course 	N/A	N/A
Onsite Supervisor	Supervisor onsite during set-up, cleanup and cleaning verification.	Onsite at all times.	Onsite at all times.	Competent person onsite at all times.
Dangerous Level in Paint	1.0 mg/cm ² 0.5 % by weight (Inspector)	1.0 mg/cm ² “POS” when sodium sulfide is used (Inspector)	1.0 mg/cm ² 0.5 % by weight Prohibits the use of sodium sulfide (Inspector)	No set limit; any amount of lead is regulated if exceeds airborne limits: Action Level (AL) = 30 ug/m ³ Permissible Exposure Limit (PEL) = 50 ug/m ³
EPA Recognized Test Kit by Certified Renovator	Allowed. Must be used according to manufacturer’s instructions. LeadCheck not to be used in drywall or plaster.	Allowed. Must be used according to manufacturer’s instructions. LeadCheck not to be used in drywall or plaster.	Not allowed. Inspector must test or CR must presume surface is positive.	N/A
Pre-Renovation Education	1-60 days before work begins Or mailed 7 days before Requires “Renovate Right”	1-60 days before work begins Or mailed 7 days before Requires “Renovate Right”	1- 15 days before work begins Or mailed 7 days before Requires “Renovate Right” or “Protect Your Family”	N/A
Minor Repair and Maintenance	< 6 ft ² per room on the interior < 20 ft ² total on the exterior	< 6 ft ² per room on the interior < 20 ft ² total on the exterior	< 2 ft ² per room on the interior < 20 ft ² on the exterior < 10% of smaller components	N/A

Please note that this table is a summary for informational purposes only and should not be used or followed as regulatory requirements. Please refer to the actual applicable regulation for specific requirements. IEE website www.IEETrains.com provides links to the various regulatory agencies.

Topic	EPA	MA DOS	HUD	OSHA
Occupant Protection	Out of the work area.	Out of the work area.	For short term jobs, must be out of the work area and/or unit for day. For longer jobs must be relocated out of the unit.	Regulated work area.
Prohibited Work Practices	Open-flame burning or torching Heat Gun above 1100°F High speed removal of paint without a HEPA attachment	Same as EPA except blasting is not limited to abrasive blasting	Same as EPA plus: Heat gun that chars paint Dry scraping or sanding farther than 1 ft. from electrical outlets Use of volatile stripper in a poorly ventilated space.	Compressed air shall not be used to remove lead from any surface unless the compressed air is used in conjunction with a ventilation system designed to capture the airborne dust created by the compressed air.
Interior Containment	Does not require windows to be sealed. Does not require HVAC system to be shut down.	Windows in the work area must be closed and sealed. HVAC system must be shut down.	Does not require windows to be sealed. HVAC system must be shut down.	Shower required when above the PEL.
Exterior Containment	Any impermeable sheeting must be disposed of at the end of the project. Plants and shrubs do not need to be covered.	Allows for the use of tarpaulins that can be cleaned at the end of the project and reused as long as it does not get used in the interior.	Any impermeable sheeting must be disposed of at the end of the project. Plants and shrubs do not need to be covered.	Shower required when above the PEL.
Clearance	Allows for the CR to clear their own project or have an inspector perform dust wipes	Allows for the CR to clear their own project or have an inspector perform dust wipes	Inspector must perform dust wipes	N/A
End of job Notification	Required no later than 30 days.	Required no later than 30 days.	Required no later than 15 days.	N/A
Record Keeping	Records Kept for 3 Years.	Records Kept for 10 Years.	Same as the EPA or state requirements.	Employee Biological Monitoring and medical examination - 30 years plus duration of employment. Exposure monitoring -30 years Temporary removal records - Duration of employment.
Employee Medical Surveillance	Not required.	Required depending on exposure to lead in the air (OSHA Lead in Construction).	Not required	Required when above the AL, if workers show symptoms of lead poisoning, or when level of lead in blood reaches regulated limits. Required to wear a respirator.
PPE	Not required.	Required according to OSHA Lead in Construction.	N/A	Required in accordance to OSHA lead in construction standard where above the PEL.

IEE PROVIDES TRAINING Courses in:

- OSHA Construction Outreach,
- Asbestos,
- Mold,
- Hazard Waste Operations,
- Online training

CONSULTING AND INSPECTIONS:

- Safety Plans and Programs,
- Lead and Asbestos in MA and NH

LEAD PAINT Courses:

- RRP/Lead Safe Renovator,
- OSHA Lead In Construction,
- Lead Abatement/Deleading,
- Lead Inspection and Risk Assessment,
- Lead Dust Sampling Technician

PRODUCT/EQUIPMENT Sales:

- HEPA Vacuums,
- Personal Protective Equipment including Suits & Respirators,
- Signs and Warning Tape,
- LeadCheck Test Kits,
- X-Poly Sheeting, Poly Sheeting,
- And much more