



CT WAP Weatherization Guidance No.3
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Implementation of EPA's Lead Renovation, Repair Painting "RRP Rule"

The purpose of this guidance is to address compliance with both the EPA's Lead Renovation, Repair and Painting Rule.

Lead Safe Weatherization

Connecticut's Weatherization Assistance Program has adopted the position that ***all*** homes constructed prior to 1978 contain lead paint. This requires the agencies' crews and their contractors to comply with all EPA LRRP practices enumerated in the State Plan for all work that is to be done to the home.

Additionally, when activities in homes built prior to 1978 disturb ***more*** than 6 ft² of interior space/room ***or*** 20 ft² of exterior space/wall, the EPA's Lead Renovation, Repair and Painting (RRP) regulations go into effect. It is a federal mandate that agencies and their crews and contractors comply with this requirement. Compliance is detailed under the sub-header "Compliance with EPA's RRP Rule" below.

Note: Per DOE WPN 17-7 Health and Safety Guidance

Action/Allowability

- Crews must follow EPA's Lead; Renovation, Repair and Painting Program (RRP) when working in pre-1978 housing unless testing confirms the work area to be lead free.
- Deferral is required when the extent and condition of lead-based paint in the house would potentially create further H&S hazards.
- **Only those costs directly associated with the testing and lead safe practices for surfaces directly disturbed during weatherization activities are allowable.**
- Documentation in the client file must include Certified Renovator certification; any training provided on-site; description of specific actions taken; lead testing and assessment documentation; and, photos of site and containment set up. Include the location of photos referenced if not in file.

Costs

These surcharges must initially be factored into the cost of the related measures as incidental to the Energy Conservation Measure.

<u>Windows</u>		<u>Doors</u>		<u>Sidewall**</u>		<u>Disposal (Transport)</u>	
<u>Material</u>	<u>Labor</u>	<u>Material</u>	<u>Labor</u>	<u>Material</u>	<u>Labor</u>	<u>Material</u>	<u>Labor</u>
30	60	30	60	25	35	0	0

****Remember:** sidewall is charged only when more than 20 ft² of space is disturbed, so care should be taken to ensure that the program is not charged unnecessarily for this measure.

These charges would include all materials and labor associated with RRP (PPE, 6mil poly, set-up, clean-up, signage, cleaning verification etc.). No other charges can be applied. As is standard practice, CT-WAP does not pay contractors for furniture removal, and lead testing should not be charged for as the State assumes that all pre-1978 homes contain lead.

Note: CT WAP will allow RRP costs, as defined above, to be charged as Health and Safety costs in cases where the Auditor has determined that an ECM is necessary and the SIR has fallen below 1.0, provided documentation and justification on optional evaluations In the NEAT/MHEA software demonstrate that this approach is warranted.

Training

It is a federal requirement that ALL individuals working on pre-1978 housing projects complete the 8-hour EPA RRP course sponsored by an EPA-approved training center to work on any pre-1978 sites. Certified Renovators are required to attend an 8-hour EPA Certified Renovator course sponsored by an EPA-approved training center.

Note: If the Certified Renovator has previously attended the 8-hour LSW Course, the renovator *must* attend a 4-hour RRP Refresher Course. If the Certified Renovator has not attended the 8-hour LSW course, they must attend both an 8-hour LSW course *and* an 8-hour EPA Certified Renovator course.