

Module 8: Training Non-Certified Renovation Workers

Certified Renovators are responsible for teaching lead-safe work practices to non-certified renovation workers.

October 2011



8-1

The RRP Rule requires that you, the Certified Renovator, be responsible for instruction of non-certified renovation workers. Note that the non-certified workers must be trained only on the RRP Rule-required work practices that the workers will be using in performing their assigned tasks. For example, if a worker is hired to only provide clean-up services, that worker would not need to be trained on how to set up a work area.

Note: See Slide 2-11 and HUD regulations for more information on the training required for workers on HUD funded renovations.

Teaching Lead Safe Work Practices Means

- Training workers to properly use signs, dust barriers, dust minimizing work practices, and dust cleanup practices during the course of renovation, repair, and painting activities to prevent and/or reduce potentially dangerous dust-lead contamination in the home.
- To effectively train workers you need to:
 - Know lead safety yourself.
 - Show students what you know.
 - Review the shopping list in *Steps to LEAD SAFE Renovation, Repair, and Painting* and have appropriate materials at hand.



October 2011

8-2

- Remember all the skills you mastered during the Skill Set exercises? You will be teaching non-certified workers to master them.
- The shopping lists in *Steps to LEAD SAFE Renovation, Repair and Painting* detail all of the equipment and supplies you may need to conduct hands-on exercises during on-the-job training of non-certified renovators.
- All that follows is presented to aid you in conduct of the training.

The Role of the Certified Renovator

Certified Renovators:

- Perform lead safe work as described in the RRP Rule.
- Train all non-certified workers in lead safe practices.
- Provide onsite and regular direction for all non-certified workers during setup and cleanup.
- Are available by phone when not physically present at the work site during work.
- Maintain onsite proof of certification as a Certified Renovator.

October 2011



8-3

What Are the Responsibilities of a Certified Renovator? Certified Renovators are responsible for ensuring overall compliance with Renovation, Repair, and Painting Program requirements for lead-safe work practices at renovations to which they are assigned.

A Certified Renovator:

1. Must use an EPA-recognized test kit or alternatively collect a paint chip sample for analysis, when requested by the party contracting for renovation services, to determine whether components to be affected by the renovation contain lead-based paint.
2. Must provide lead-safe work practices training to non-certified workers so those workers can perform assigned tasks safely. This training can be provided by the Certified Renovator on-the-job or in the classroom, provided adequate hands-on practice is available. This training could also be conducted by a third party although the instructor must be a Certified Renovator.
3. Must be physically present at the work site when warning signs are posted, while the work area containment is being established, and while the work area cleaning is performed. (*Note: Use the terms **Setup** and **Cleanup** to describe this work*).
4. Must monitor work being performed by non-certified individuals to ensure that lead-safe work practices are being followed. This includes maintaining the integrity of the containment barriers and ensuring that no dust or debris migrates from the work area.
5. Must be available, either on-site or by telephone, at all times during performance of the renovation.
6. Must perform project cleaning verification.
7. Must have copies of their initial course completion certificate and their most recent refresher course completion certificate at the work site. Certification as a Certified Renovator lasts for 5 years. The Certified Renovator must take a refresher course every 5 years in order to maintain certification.
8. Must prepare required records.

The EPA Renovation, Repair, and Painting Rule is found at 40 CFR 745.85 (a) and (b).

Lead Safety for Renovation, Repair, and Painting

Role of Trained, Non-Certified Renovation Workers

- **Trained, non-certified renovation workers are persons, working on renovation, repair and painting jobs who have had on-the-job training or similar classroom training from a Certified Renovator to perform tasks in conformance to the EPA RRP Rule.**
- **They must perform lead-safe work practices as described in the RRP rule:**
 - **Protect the home by “setting up” the work area.**
 - **Protect themselves.**
 - **Perform renovation work safely.**
 - **Prohibited Practices must not be used.**
 - **Control dust and debris.**
 - **Clean the work area.**

October 2011



8-4

On-the-job training must be provided for each worker and for each job to the extent that each worker is adequately trained for the tasks he or she will be performing. This training may occur while the worker is engaged in productive work, which provides knowledge and skills essential to the full and adequate performance of the job. However, work conducted during training must be in full compliance with the RRP Rule.

Trainees will benefit by seeing the “Steps” to lead safety found in *Steps to LEAD SAFE Renovation, Repair and Painting* in Appendix 5 (this document is also referred to as the “Steps Guide”). It contains a seven step primer on lead safety and can be used as a field text to hand out to non-certified worker trainees in the field. In the “Steps Guide”, steps 2 through 6 contain information specific to work performed by non-certified personnel, while step 1 and step 7 contain information on testing painted surfaces and cleaning verification which are Certified Renovator responsibilities. Step 7 also discusses clearance examination which is performed only by Certified Lead Inspectors, Certified Lead Risk Assessors, and Certified Dust Sampling Technicians.

The information in the “Steps Guide” can be covered in about 5 minutes per Step and then reinforced by on-the-job practical exercises such as setting up barriers and signs, demonstrations of cleaning procedures, etc. It is recommended that the material in the “Steps Guide” be covered in a toolbox (on-site) meeting format with handouts on the specific information to be covered.

It is very important that non-certified personnel be allowed to participate in hands-on learning as work progresses and that skill sets that are learned by each student are documented. Documentation is required by the RRP Rule to assure that non-certified workers are trained to perform renovation activities to which they are assigned. Remember that the RRP Rule requires all non-certified personnel on the job to be given skills training specific to the tasks that they will perform on the job and that each person’s training must be documented by topic area covered in the on-the-job training that is performed. The required documentation will be discussed in more detail later.

Steps for Teaching Lead Safety During Renovations

- Approach to training non-certified renovators

October 2011

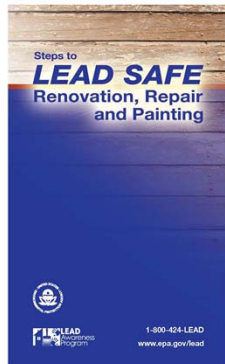


8-5

Training for non-certified renovation workers can be delivered in one session covering all 7 Steps or the information can be covered in a series of “toolbox” meetings over the course of several days. You should spend about 5-10 minutes on the information contained in each “Step” and then conduct on-the-job training to teach the skills needed to renovate lead safely.

If this training is offered in the classroom, Slides 8-6 through 8-15 could be used to teach the material found in the ***Steps to LEAD SAFE Renovation, Repair, and Painting***. This document is included as Appendix 5 of your student manual. Use the ***Steps to LEAD SAFE Renovation, Repair, and Painting*** as a student handout for training non-certified renovation workers. The handout should also include write-ups of demonstrations and practical hands-on exercises, and a checklist of desired skills to reinforce the “toolbox” talks or classroom training. During either “toolbox” talks or classroom instruction, have non-certified renovator trainees refer to the training handout while you teach the information.

Use the “Steps” Guide



- *Steps to LEAD SAFE Renovation, Repair and Painting* covers basic lead safe practices and can be used as a training guide outside of the classroom in conjunction with on-the-job demonstrations and hands-on training.
- It is strongly recommended that you use this guide as a basis for training.



October 2011

8-6

Before You Train: Print copies of *Steps to LEAD SAFE Renovation, Repair, and Painting* and give one copy to each non-certified renovator trainee.

Step 1: Determine If the Job Involves Lead-Based Paint

- Lead-based paint (LBP) is found many older homes:
 - 1960-1978 homes – 1 in 4 have LBP.
 - 1940-1960 homes – 7 in 10 have LBP.
 - Pre-1940 homes – 9 in 10 have LBP.
- Renovation, repair or painting that disturbs lead-based paint can create significant lead-based paint hazards in homes.
- Just a little lead-based paint dust can poison kids, their parents and pets, and can cause problems for pregnant women and their unborn children.
- The Certified Renovator will determine if lead-based paint is present on work surfaces.
- If information about lead-based paint is not available for a pre-1978 homes or a child-occupied facility, assume that lead-based paint is present and use lead-safe work practices.



October 2011

8-7

During Training:

Review the information on this slide with the non-certified renovator students as they follow along on pages 4 & 5 of the ***Steps to LEAD SAFE Renovation, Repair, and Painting.***

Notes to the On-The-Job Instructor: This information is included in the on-the-job training so non-certified renovators will understand why they need to use lead-safe work practices. Non-certified renovators are not allowed to determine whether lead-based paint is present, but they should understand that when it is identified as present, generating dust can cause significant problems if not properly and safely controlled.

More information:

- Review pages 4 and 5 of the ***Steps to LEAD SAFE Renovation, Repair and Painting.***

Step 2: Set It Up Safely

- **Containment is used to keep dust IN the work area and non-workers OUT!**
- **Signs and barriers are used to limit access.**
- **Inside versus outside jobs**
 - **Review all procedures and differences in setup.**

October 2011



8-8

What To Do

To keep the dust in, and people out, of your work area, you will need to take slightly different steps for inside or outside jobs.

For Inside Jobs

- Place signs, barrier tape, and/or cones to keep all non-workers, especially children, out of the work area. Keep pets out of the work area for their safety and to prevent them from tracking dust and debris throughout the home.
- Remove furniture and belongings from the work area. If an item is too large or too heavy to move, cover it with heavy plastic sheeting and tape the sheeting securely in place.
- Use heavy plastic sheeting to cover floors in the work area to a minimum of 6 feet from the area of paint disturbance. Close and seal doors, close windows.
- Close and cover air vents in the work area. This will keep dust from getting into the system and moving through the home.

For Outside Jobs

- Keep non-workers away from the work area by marking it off with signs, tape and/or cones. Have owner keep pets out of the work area.
- Cover the ground and plants with heavy plastic sheeting to catch debris. The covering should extend at least 10 feet out from the building, unless a property line prevents 10 feet of such ground cover, in which case the firm must erect vertical containment. Secure the covering to the exterior.
- Close windows and doors within 20 feet of the work area to keep dust and debris from going into the home.
- Move (if possible) or cover play areas and equipment within 20 feet of the work area.

Step 3: Protect Yourself

- **Without the right personal protective equipment (PPE) workers can swallow and inhale lead from the job, and can carry lead on their skin and work clothes home to their families.**
- **Review the “shopping list.”**
- **Advise workers to:**
 - Keep clothes clean or use disposable clothing.
 - Wear a respirator. The appropriate respirator keeps lead out of the lungs and stomach.
 - Wash-up each time they leave the work area and especially at the end of the day.

October 2011



8-9

Wear protective clothing.

- Protective clothing and shoe covers are very important in preventing “take home” lead and to prevent you from tracking lead out of the work area. They can also help prevent contamination of areas that have already been cleaned during final cleanup.
- Keep clothes clean. At the end of the work day, vacuum off dust or change out of dusty clothes. Do not use compressed air to blow dust off clothing. Wash dirty work clothes separately from household laundry.
- Wear a painter’s hat to protect your head from dust and debris.

Wear respiratory protection.

- When work creates dust or paint chips, employers should consider respiratory protection, such as a N-100 disposable respirator, to prevent workers from breathing leaded dust.

Post warning signs.

- Post a warning sign at each work area entrance.
- Signs should read: “Warning, Lead Work Area, Poison, No Smoking or Eating” to remind workers that eating, drinking and smoking in the work area is prohibited.

Wash up.

- Workers should wash their hands and faces each time they stop work. It is especially important to wash up before eating and at the end of the day.

Note: OSHA rules may require employers to take further steps to protect the health of workers on the job.

Step 4: Control the Spread of Dust

- The goal is to control the spread of dust that is created.
- Review the “shopping list.”
- Use the right tools.
- Disposable plastic drop cloths control the spread of dust and debris.
- Avoid prohibited practices.

October 2011



8-10

Control the spread of dust.

- Keep the work area closed off from the rest of the home.
- Don't track dust and debris out of the work area.
- Stay in the contained work area and on the contained paths.
- Vacuum off suits when exiting the work area so the dust stays inside containment.
- Remove disposable shoe covers and make sure your shoes are clean by using tack pads or damp paper towels to wipe off your shoes each time you step off the protective sheeting.
- Keep components in the work area until they are wrapped securely in heavy plastic sheeting or bagged in heavy duty plastic bags. Once wrapped or bagged, HEPA vacuum the exterior and remove them from the work area and store them in a safe area away from residents.
- Launder non-disposable protective clothing separate from family laundry.
- Do not use Prohibited Practices, including:
 - Open-flame burning or high heat removal of paint, and,
 - Power tools such as sanders without HEPA attachments.



The HUD Rule also prohibits extensive dry scraping and sanding by hand, use of heat guns that char paint and paint stripping in a poorly ventilated space using a volatile paint stripper. States, localities or tribes may prohibit additional work practices.

Step 5: Leave the Work Area Clean

- The goal should be to leave the work area completely free of dust, debris and residue.
- Review the “shopping list.”
- Discuss daily cleaning procedures.
- Discuss end of job cleaning procedures.

October 2011



8-11

On a daily basis, pick up the work area (recommended).

- Pick up as you go. Put trash in heavy-duty plastic bags.
- Vacuum the work area with a HEPA vacuum several times during the day and for sure at the end of the day. Do not clean with standard household or shop vacuum cleaners. Use only HEPA vacuums.
- Clean tools at the end of the day.
- Wash your hands each time you leave the work area and especially well before you go home.
- Dispose of all disposable personal protective clothing daily.

When the job is complete, clean the work area (required).

- Make sure all paint chips, dust, trash and debris, including building components, are removed from the area to be cleaned and disposed of properly.
- Carefully remove plastic sheeting on the floor, fold it with the dirty side in, tape the edges shut or seal it in a heavy duty plastic bag, and dispose of it. Keep plastic sheeting in doorways and openings that separate the work area from non-work areas in place until the work area is released as clean.
- HEPA vacuum or wet wipe all wall surfaces. HEPA vacuum all other surfaces in the work area. Use a beater bar attachment on carpets.
- Wet wipe all remaining surfaces in the work area and wet mop all uncarpeted floors until dust, debris and residue are removed.
- Visually inspect your work. Look around the work area and two feet beyond, and on paths where debris was carried. You should see no dust, debris or residue.
- Re-clean the area thoroughly if you find dust, debris or residue.

Step 6: Control the Waste

- **Discuss the waste bagging procedure.**
- **Demonstrate folding a small section of plastic with the dirty side turned in.**
- **Discuss temporary storage of waste.**
- **Discuss how to deal with waste water appropriately.**
- **Discuss waste disposal rules that apply to the specific job.**

October 2011



8-12

Bag or wrap your waste at the work site and in the work area.

Collect and control all your waste. This includes dust, debris, paint chips, protective sheeting, HEPA filters, dirty water, clothes, mop heads, wipes, protective clothing, respirators, gloves, architectural components, and other waste. Use heavy plastic sheeting or bags to collect waste. Gooseneck seal the bag with duct tape. Consider double bagging waste to prevent tears. Large components should be wrapped in protective sheeting and sealed with tape. Bag and seal all waste before removing it from the work area. HEPA vacuum the exterior of waste bags and bundles before removing them from the work area. Store all waste that has been collected from renovation activities preventing access to and release of dust and debris.

Dispose of waste water appropriately.

Water used in the work area to remove paint or to clean surfaces should be filtered through a 5 micron filter. Never dump this water down a sink or tub, in a storm drain, or on the ground. It may be dumped in a toilet if local rules allow. If local regulations do not allow this, you may be required to contain and test the water, and contact a waste disposal company to assist you with disposal. **Check with your local water treatment authority, and in Federal and state regulations for more information.**

Be aware of waste disposal rules.

EPA considers most residential renovation, repair and painting activities “routine residential maintenance.” The waste generated by these activities is classified as solid, non-hazardous waste and can be disposed of in an ordinary waste landfill. Some states and localities have more stringent waste disposal requirements that must be followed.

Step 7: Cleaning Verification or Clearance Testing

- **Cleaning verification will be performed by a Certified Renovator after most renovations.**
- **A clearance examination may be requested in place of cleaning verification by the owner, and is required in some cases.**
- **Discuss what happens when cleaning verification and/or clearance is not passed.**

October 2011



8-13

When all the cleaning is complete, and before the space is reoccupied, a cleaning verification procedure or clearance examination must be conducted to make sure leaded dust is not left behind. If the HUD Rule applies, a clearance examination is required in place of the cleaning verification procedure. The first step to both cleaning verification and a clearance examination is a visual inspection of the work area to determine if dust, debris or residue was left behind. If dust, debris or residue are present in the work area, cleaning must be repeated and the visual inspection repeated until the work area is free of dust, debris and residue. Once the visual inspection by the Certified Renovator is complete, either the cleaning verification procedure or clearance examination can proceed.

Training Documentation

- **The Certified Renovator assigned to the job must maintain the following records for on-the-job training :**
 - **Written certification of worker training:**
 - **Must show which workers have what training;**
 - **Must list all training topics covered for each worker; and,**
 - **Must be signed by the Certified Renovator who did the training.**
 - **All training documentation must be kept for 3 years following completion of the renovation.**

October 2011



8-14

When you give this “toolbox training”, use of a training guide, such as *Steps to LEAD SAFE Renovation, Repair and Painting*, will make documentation easier. You should keep a copy of the training guide used at the “toolbox” training you conduct on-site. Make a list of each lead safe practical skill covered for each individual non-certified worker. A list of the practical skills taught to each non-certified worker with the material covered in the toolbox meetings will provide adequate documentation to meet RRP Rule requirements.

Now You Know...

- That Certified Renovators are responsible for training non-certified renovation workers.
- The roles of Certified Renovators and trained, non-certified workers during conduct of a renovation.
- How to use *Steps to LEAD SAFE Renovation, Repair and Painting* to train non-certified renovation workers.

October 2011



8-15