



CUYAHOGA COUNTY BOARD OF HEALTH  
5550 VENTURE DRIVE  
PARMA, OHIO 44130  
(216) 201-2000  
[www.ccbh.net](http://www.ccbh.net)

TERRENCE M. ALLAN, R.S., M.P.H.  
Health Commissioner



**Public Health**  
Prevent. Promote. Protect.  
Northeast Ohio Public Health Partnership

September 10, 2010  
The Honorable Susan Drucker  
Mayor, City of Solon  
34200 Bainbridge Rd.  
Solon, OH 44139

**Re: Certification of Lead Safe Work Practices by contractors**

Dear Mayor Drucker,

On April 22, 2010, the U.S. EPA finalized the law requiring all contractors working in a pre-1978 residential or child occupying structure to be certified under the **Renovation, Repair and Paint** program. A one page synopsis of this new rule is attached for your review.

Common renovation activities like sanding, cutting, and demolition may create hazardous lead dust and chips by disturbing lead-based paint, which can be harmful to children and adults. Exposure to lead dust can reduce IQ and impact children's ability to learn. Research has also linked lead exposure to juvenile delinquency. To protect against this risk, the U.S. EPA issued a rule requiring the use of lead-safe practices and other actions aimed at preventing lead poisoning. The requirements apply to those individuals performing renovation, repair or painting activities for financial compensation (which includes rental units). The rule does not apply to minor maintenance or repair activities or homeowners doing work on their own residence.

In order to assist communities in addressing the components of this new law, we have developed a model ordinance that can be used to meet your building department's contractor registration requirements. The goal is to have all contractors performing renovation, repair or painting activities provide proof of U.S. EPA certification at time of contractor registration. This model ordinance is attached.

Since Greater Cleveland still has the highest rate of childhood lead poisoning in Ohio and among the highest in the nation, we encourage your community to take these important steps in reducing children's exposure to lead hazards during home renovation.

Please feel free to contact Stephanie McConoughey at 216-201-2001 x 1244 or at [smcconoughey@ccbh.net](mailto:smcconoughey@ccbh.net) if you have any questions or need further assistance.

Sincerely,

Terrence Allan, RS, MPH  
Health Commissioner

cc: Building Commissioner

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## US EPA's Renovation, Repair and Paint Program synopsis

Beginning April 22, 2010, contractors performing renovation, repair and painting projects that disturb paint in homes, child care facilities, and schools built before 1978 must be certified by the EPA and must follow specific work practices to prevent lead contamination.

Contractors must use lead-safe work practices and follow these three simple procedures: contain the work area, minimize dust and clean up thoroughly. Also, there are pre-renovation education requirements as well. Individuals can become certified renovators by taking an eight-hour training course from an EPA-approved training provider.

### Requirements

- Anyone who receives financial compensation for work that disturbs paint in housing and child-occupied facilities built before 1978, this may include, but is not limited to:
  - Residential rental property owners/managers
  - Building service professionals
  - General contractors
  - Special trade contractors (Painters, Plumbers, Carpenters, Electricians)
- All individuals performing the activities are either EPA certified contractor or working under an EPA certified contractor
- All activities are performed in a lead safe fashion
- Distribute lead pamphlet prior to work starting
- Post proper signage

### Exemptions

- Residential units or child occupying facilities built after 1978
- Dedicated senior housing or group housing for adults only
- Houses declared lead-free by a stated licensed lead risk assessor or paint inspector
- Minor work that disturbs less than 6 ft<sup>2</sup> of paint/room or less than 20 ft<sup>2</sup> of paint on the outside (window replacement is not considered minor maintenance/repair)
- Homeowners doing work on their own occupied residential unit
- Emergency renovations (imminent threat to the health and/or safety of the occupants or adjacent properties)

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## **RENOVATION, REPAIR AND PAINTING WORK PRACTICES**

WHEREAS, the US EPA estimates there are approximately 38 million American homes with lead based paint built before 1978. Based on the 2000 census, 89% (506,533) of Cuyahoga County's housing stock was built before 1978. It is presumed that paint in the interior or exterior of all residential properties or child occupying facilities constructed prior to March 1, 1978, is lead-based paint.

WHEREAS, the Centers for Disease Control and Prevention estimates that there are approximately 121,000 children under the age of six lead poisoned in the United States, and that lead poisoning is one of the most common, preventable pediatric health problems in this country. Cuyahoga County has the highest number of children lead poisoned in the state.

WHEREAS, lead is most harmful to children less than six years of age, interfering with the developing brain and other organs and systems such as the nervous system and kidneys. Lead poisoning has been proven to reduce IQ, cause attention deficit disorder, hearing loss, impaired growth, reading and learning disabilities, as well as other health, behavioral, and intellectual consequences.

### **PURPOSE:**

- a. To protect occupants and the public from exposures to lead-based paint hazards;
- b. To promote lead safe work practice standards for all persons involved in renovation, repair, or painting for compensation in a residential structure or child occupying facility built before 1978;
- c. To reduce childhood lead poisoning caused by uncontrolled lead-base paint disturbance.

### **THEREFORE, BE IT RESOLVED:**

- a. Any person who performs renovation, repairs, or painting of a residential property, or child occupying facility for compensation, must be US EPA certified in lead safe work practices and registered as a certified firm with the US EPA.
- b. Contractors registering with the City who conduct the activities listed above in this ordinance must provide proof of the US EPA RRP certification and registration.