

# STATE OF COLORADO

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Dedicated to protecting and improving the health and environment of the people of Colorado

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Colorado Department  
of Public Health  
and Environment

March 26, 2014

Subject: Lead Hazard Cleanup for RRP Projects that have created a Lead Hazard  
From: CDPHE Lead Unit  
To: Lead Evaluation and Abatement Firms

## Owners and Managers:

The US Environmental Protection Agency's Lead-based Paint Renovation, Repair, and Painting Rule (RRP) is now in effect for general remodeling projects conducting in pre-1978 residential housing and child-occupied facilities. The RRP Rule is intended to prevent the creation of lead hazards in target housing and child-occupied facilities during remodeling projects.

It has been found that significant lead hazards are being created during some RRP projects due to the failure of firms to follow RRP engineering controls, or when remodeling projects are done by individuals or firms that do not have proper RRP training and certification.

When it is suspected that a lead hazard has been created, EPA will require a state certified firm and individual be contacted to conduct an inspection, including wipe samples. If the results of the inspection determine that a lead hazard has been created the follow steps will be conducted:

- The site will be considered a lead-contaminated home or building and RRP standards and practices will no longer apply
- Both the EPA and the CDPHE Lead Unit have determined that the clean-up is now defined as a lead abatement project
- Regulation 19 standards will be required to be followed in order to properly clean-up the lead hazards:
  - A state certified abatement firm and individuals will be required to conduct the clean-up
  - The firm will need to apply for a permit and follow all of the requirements of Regulation No. 19, Part A, Section V, Abatement
  - A state certified firm and individual will be required to conduct project clearances sampling and provide the CDPHE Lead Unit with copies of the clearance reports

Colorado Air Quality Control Commission Regulation 19, Part A, states:

II.B.48. Lead-based paint hazard means any condition that causes exposure to lead from lead-contaminated dust, lead-contaminated soil, or lead-based paint. Lead-based paint hazard also means hazardous lead-based paint, dust-lead hazard or soil-lead hazard as identified in:

II.B.48.a. Paint-lead hazard

II.B.48.b. Dust-lead hazard

II.B.48.c. Soil-lead hazard

If you have any questions, please contact the CDPHE Lead Unit –

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Thank you very much for your attention to this matter.