

Table 2. Description of Potential Work Practice Regulatory Options

Interior containment	Before beginning the renovation, the firm must isolate the work area so that no dust or debris leaves the work area while the renovation is being performed.
Interior work practices	<ul style="list-style-type: none"> • Remove all objects from the work area, including furniture, rugs, and window coverings, or cover them with plastic sheeting or other impermeable material with all seams and edges taped or otherwise sealed. • Close and cover all ducts opening in the work area with taped-down plastic sheeting or other impermeable material. • Close windows and doors in the work area. Doors must be covered with plastic sheeting or other impermeable material. Doors used as an entrance to the work area must be covered with plastic sheeting or other impermeable material in a manner that allows workers to pass through while confining dust and debris to the work area. • Cover the floor surface, including installed carpet, with taped-down plastic sheeting or other impermeable material in the work area 6 feet beyond the perimeter of surfaces undergoing renovation or a sufficient distance to contain the dust, whichever is greater. • Use precautions to ensure that all personnel, tools, and other items, including the exteriors of containers of waste, are free of dust and debris before leaving the work area.
Exterior work practices	<ul style="list-style-type: none"> • Close all doors and windows within 20 feet of the renovation. • Ensure that doors within the work area that will be used while the job is being performed are covered with plastic sheeting in a manner that allows workers to pass through. • Cover the ground with plastic sheeting or other disposable impermeable material extending 10 feet beyond the perimeter of surfaces undergoing renovation or a sufficient distance to collect falling paint debris. (Consistent with 2008 standards located at 40 CFR 745.85) • If the renovation will affect surfaces within 10 feet of the property line, the renovation firm must erect vertical containment to ensure that dust and debris from the renovation does not contaminate adjacent buildings or migrate to adjacent properties. Vertical containment may also be necessary in other situations, such as in windy conditions. <hr/> <ul style="list-style-type: none"> • Remove all objects from the work area, including outdoor furniture, and rugs, or cover them with plastic sheeting. • Close and cover all HVAC ducts opening in the work area with taped-down plastic sheeting. • Close windows and doors in the work area. Doors must be covered with plastic sheeting. Doors used as an entrance to the work area must be covered with plastic sheeting in a manner that allows workers to pass through while confining dust and debris to the work area. • Use precautions to ensure that all personnel, tools, and other items, including the exteriors of containers of waste, are free of dust and debris before leaving the work area.

Prohibited and restricted practices	<p>The work practices listed below shall be prohibited or restricted during a renovation as follows:</p> <ul style="list-style-type: none"> • Open-flame burning or torching of lead-based paint is prohibited.* • The use of machines designed to remove paint through high speed operation such as sanding, grinding, power planing, needle gun, abrasive blasting, or sandblasting, is prohibited on painted surfaces unless such machines are shrouded and equipped with a HEPA vacuum attachment to collect dust and debris at the point of generation. • Operating a heat gun on lead-based paint is permitted only at temperatures below 1100 degrees Fahrenheit.*
Waste disposal	<ul style="list-style-type: none"> • Waste from renovation activities must be contained to prevent releases of dust and debris before the waste is removed from the work area for storage or disposal. If a chute is used to remove waste from the work area, it must be covered. • At the conclusion of each work day and at the conclusion of the renovation, waste that has been collected from renovation activities must be stored under containment, in an enclosure, or behind a barrier that prevents release of dust and debris out of the work area and prevents access to dust and debris. • When the firm transports waste from renovation activities, the firm must contain the waste to prevent release of dust and debris.
Restricted entry	Via signs, barriers, and other means, firms must ensure that non-workers are prohibited from entering the work area.
Interior cleaning	<p>After the renovation has been completed, the firm must clean the work area until no dust, debris or residue remains.</p> <ul style="list-style-type: none"> • Collect all paint chips and debris and, without dispersing any of it, seal this material in a heavy-duty bag. • Remove the protective sheeting. Mist the sheeting before folding it, fold the dirty side inward, and either tape shut to seal or seal in heavy-duty bags. Sheeting used to isolate contaminated rooms from non-contaminated rooms must remain in place until after the cleaning and removal of other sheeting. Dispose of the sheeting as waste. <p>Additional cleaning for interior renovations. The firm must clean all objects and surfaces in the work area and within 2 feet of the work area in the following manner, cleaning from higher to lower:</p> <ul style="list-style-type: none"> • Walls. Clean walls starting at the ceiling and working down to the floor by either vacuuming with a HEPA vacuum or wiping with a damp cloth. • Remaining surfaces. Thoroughly vacuum all remaining surfaces and objects in the work area, including furniture and fixtures, with a HEPA vacuum. The HEPA vacuum must be equipped with a beater bar when vacuuming carpets and rugs. • Wipe all remaining surfaces and objects in the work area, except for carpeted or upholstered surfaces, with a damp cloth. Mop uncarpeted floors thoroughly, using a mopping method that keeps the wash water separate from the rinse water, such as the 2-bucket mopping method, or using a wet mopping system.

Standards for post-renovation cleaning verification, if required:

- A certified renovator must perform a visual inspection to determine whether dust, debris or residue is still present. If dust, debris or residue is present, these conditions must be removed by re-cleaning and another visual inspection must be performed.
- After a successful visual inspection, a certified renovator must:
 - A. Verify that each windowsill in the work area has been adequately cleaned, using the following procedure.
 1. Wipe the windowsill with a wet disposable cleaning cloth that is damp to the touch. If the cloth matches or is lighter than the cleaning verification card, the windowsill has been adequately cleaned.
 2. If the cloth does not match and is darker than the cleaning verification card, re-clean the windowsill then either use a new cloth or fold the used cloth in such a way that an unused surface is exposed, and wipe the surface again. If the cloth matches or is lighter than the cleaning verification card, that windowsill has been adequately cleaned.
 3. If the cloth does not match and is darker than the cleaning verification card, wait for 1 hour or until the surface has dried completely, whichever is longer.
 4. After waiting for the windowsill to dry, wipe the windowsill with a dry disposable cleaning cloth. After this wipe, the windowsill has been adequately cleaned.
 - B. Wipe uncarpeted floors and countertops within the work area with a wet disposable cleaning cloth. Floors must be wiped using an application device with a long handle and a head to which the cloth is attached. The cloth must remain damp at all times while it is being used to wipe the surface for post-renovation cleaning verification. If the surface within the work area is greater than 40 square feet, the surface within the work area must be divided into roughly equal sections that are each less than 40 square feet. Wipe each such section separately with a new wet disposable cleaning cloth. If the cloth used to wipe each section of the surface within the work area matches the cleaning verification card, the surface has been adequately cleaned.
 1. If the cloth used to wipe a particular surface section does not match the cleaning verification card, re-clean that section of the surface, then use a new wet disposable cleaning cloth to wipe that section again. If the cloth matches the cleaning verification card, that section of the surface has been adequately cleaned.
 2. If the cloth used to wipe a particular surface section does not match the cleaning verification card after the surface has been re-cleaned, wait for 1 hour or until the entire surface within the work area has dried completely, whichever is longer.
 3. After waiting for the entire surface within the work area to dry, wipe each section of the surface that has not yet achieved post-renovation cleaning verification with a dry disposable cleaning

	<p>cloth. After this wipe, that section of the surface has been adequately cleaned.</p> <p>When the work area passes the post-renovation cleaning verification, remove the warning signs.</p>
Exterior Cleaning	<p>After the renovation has been completed, the firm must clean the work area until no dust, debris or residue remains.</p> <ul style="list-style-type: none"> • Collect all paint chips and debris and, without dispersing any of it, seal this material in a heavy-duty bag. • Remove the protective sheeting. Mist the sheeting before folding it, fold the dirty side inward, and either tape shut to seal or seal in heavy-duty bags. Sheeting used to isolate contaminated rooms from non-contaminated rooms must remain in place until after the cleaning and removal of other sheeting. Dispose of the sheeting as waste. <p>A certified renovator must perform a visual inspection to determine whether dust, debris or residue is still present on surfaces in and below the work area, including windowsills and the ground.</p> <ul style="list-style-type: none"> • If dust, debris or residue is present, these conditions must be eliminated and another visual inspection must be performed. <p>When the area passes the visual inspection, remove the warning signs.</p>
<p>Note: Work practices are from 40 CFR 745 Subpart E, except “Standards for post-cleaning verification, if required”. In RRP, post-cleaning verification is required.</p>	