

We Can Protect Children from Lead Hazards by Implementing EPA's Rule on Lead Safe Renovation, Remodeling, and Painting

EPA's regulation of renovation, repair, and painting (RRP) projects was mandated by Congress in 1992 (P.L. 102-550). The point of the rule is to prevent the creation of lead hazards during work that disturbs paint in older housing (including energy efficiency work). This rule is key to preventing childhood lead poisoning in pre-1978 homes and child-occupied facilities. In some states, one-half of all lead poisoning cases are caused by unsafe renovation work.

The RRP rule will protect 1.4 million children under the age of six from lead exposure in its first year, and additionally benefit 5.4 million individuals over the age of six. The estimated cost of the rule as acknowledged by the Bush Administration's 2008 economic analysis is \$35 per renovation job, including \$5/month for firm certification.

Here are some basic facts about lead poisoning:

- There are approximately 250,000 children in the United States with lead poisoning.
- Each year, more than one million children are at risk of lead poisoning when their older homes are renovated.
- Lead in dust is the most common way people are exposed to lead. Projects that disturb lead-based paint can create dust and endanger children and families.
- Lead is especially toxic for young children since their brains are still developing. The effects include permanent brain damage, including loss of IQ, behavior problems, memory problems and reduced growth.
- Lead remains the most significant environmental health hazard to children.
- Adults aren't immune either. Among adults, lead exposure can result in reproductive problems, high blood pressure, nerve disorders, muscle and joint pain and memory problems.

Some industry interests are calling for delay or for exempting new federally-funded programs from the renovation rule requirements. Any delay at this point is inappropriate – Congress mandated that the rule become effective in 1996—some fourteen years later, children remain at his risk of lead poisoning when their homes are renovated, repaired, or painted. To exempt work subsidized under Home Star would cause federal funds to put children in harm's way.

The undersigned organizations acknowledge that there are many individual who still require training, but we believe that the industry and EPA are positioned to move forward without a delay. We have been informed by EPA that it estimates that between 100,000 and 120,000 individuals will have been trained by the rule's effective date of April 22. There will be thousands more persons trained thereafter as awareness of the requirements continues to grow and the momentum continues.

We encourage the Obama Administration and Congress to consider making resources available for free training and paid advertising. Because access to accredited training has varied widely, and some states lack enough training to train the number of potential renovators who need training, we encourage consideration of funding free training to motivate trainers to schedule classes. There remains a place for raising public awareness of the requirements so property owners will know to hire certified renovators and to be aware that renovators are required to follow lead-safe practices. Further, EPA must devote sufficient resources to compliance assistance and enforcement and should consider the appropriate use of forbearance from enforcement actions for contractors who comply with the core requirements and demonstrate progress toward 100% compliance.

American Public Health Association
Children's Health Forum
Coalition to End Childhood Lead Poisoning
National Center for Healthy Housing
Sierra Club
The Home Safety Council

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