

ESA Program Lead-Safe Weatherization

Presentation to the
Low Income Oversight Board
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A Presentation by:

- Pacific Gas & Electric
- Southern California Edison
- Southern California Gas Company
- San Diego Gas & Electric
- RHA Inc.

Policies & Procedures

- **Draft Lead Policy**

- All ESA Program installation contractors, who may disturb paint during the installation of energy efficiency measures:
 - Must comply with all local, state, and federal lead regulations.
 - Are responsible for any and all required training and certifications for their employees and firm.
 - Must equip their installation crews with all required tools, materials, and safety equipment to work in a lead-safe manner.
 - Will not be reimbursed for meeting compliance requirements

Regulatory Environment

- **Federal**

- Environmental Protection Agency, Renovation, Remodeling, and Painting Rule (EPA RRP, RRP, or the Rule) 40CFR Part 745.80

- **State**

- Title 17, Lead In Construction Regulations, Dept. of Public Health (DPH)
- CalOSHA Title 8, Section 1532.1

EPA RRP Requirements

- **EPA Certified Firm**
 - All ESA Program contractors are certified firms
 - List maintained by each IOU Program
- **EPA Certified Renovator**
 - At least one individual from each “firm” is an EPA-Certified Renovator
 - Train crew members in lead-safe weatherization practices.
- **EPA Enforced**



EPA Certified Firm

- **Requirements**

- Use certified renovators
- Provide EPA's lead hazard information pamphlet and obtain a signed acknowledgement.
- Use lead-safe work practices when disturbing leaded or presumed leaded surfaces.
- Document lead paint identification, safe practices, thorough cleaning, and cleaning verification.
- Retain documents for three years.



EPA-Certified Renovator

- **Requirements**

- Determine if compliance with the RRP Rule is required.
- Must either identify LBP or presume LBP.
- Must determine the lead-safe work practices needed at each site.
- Must be physically present at the work site when:
 - warning signs are posted
 - while the work-area containment is being established
 - while the work-area cleaning is performed



EPA-Certified Renovator

- **Requirements, cont.**
 - Must be available when renovations are being conducted.
 - Must perform work site cleaning verification.
 - Must have copies of their certificate with them.
 - Must prepare required records.
 - Be recertified every five years



WIS Standards

- **Appendix E – Lead Safe Weatherization**
 - Modified in latest revisions to include RRP Rule
 - Each ESA measures' lead risk identified
 - High Risk – high potential to disturb lead
 - Low Risk – low potential to disturb lead
 - No Risk – will not disturb lead



Lead Paint Risk Factor
LOW - HIGH

High-Risk Measures

- Compliance with regs (lead-safe practices) required when:
 - Pre-1978 homes, and
 - >2 sq. ft. of interior or >20 sq. ft. of exterior painted surfaces disturbed, and/or
 - Painted surfaces in deteriorated condition, and disturbance is inadvertent, and/or
 - Paint dust generating or pulverizing work activities



Lead Paint Risk Factor
HIGH

Low-Risk Measures

- Compliance with regs (lead-safe practices) may be required when:
 - Pre-1978 homes, and
 - Minor disturbance of painted surfaces, and/or
 - < 2 sq. ft. on interior surfaces disturbed as part of work activity, and/or
 - No significant paint dust generating activity or pulverizing work activity



Lead Paint Risk Factor
LOW

No-Risk Measures

- Compliance with regs not required:
 - Pre-1978 homes, if:
 - No painted or coated surfaces disturbed
 - If tested, no lead-painted surfaces disturbed
 - Certified lead-free by an inspection
 - Post-1977 residential structures
 - Pre-1978 factory-painted mobile or manufactured homes



Lead Paint Risk Factor
NO