

Supplement - Steps to Lead Safe Renovation, Repair and Painting

Updates to versions published before March 2026

The following replaces the first paragraph on **page 6**

The RRP Rule affects contractors, property managers and others who disturb known or presumed lead-based paint during renovation. The term renovation covers all activities done for compensation that disturb painted surfaces including most repair, remodeling and maintenance activities, such as window replacement, weatherization and demolition. The RRP Rule applies to all renovation work performed in residential houses, apartments and child-occupied facilities such as schools and day-care centers built before 1978 where a child under 6 years of age regularly visits. To assist those affected by the RRP Rule, EPA developed the Small Entity Compliance Guide to Renovate Right, which provides an overview of the rules requirements. This guide, along with links to other related materials is available on EPA's Web site at <https://www.epa.gov/lead/lead-safety-documents-and-outreach-materials>.

The following information replaces the first and second paragraphs on **page 24**

Verify Work Completion with the Cleaning Verification Procedure or Dust-Lead Testing

When all the work is complete, and before interior space is reoccupied, you must determine whether it is a safe environment to live in.

To ensure work areas are ready for reoccupancy, cleaning verification is required by the RRP Rule. If the housing receives federal assistance, post-renovation dust-lead testing is required. When the cleaning verification procedure is required, an EPA certified renovator must perform the cleaning verification procedure. If post-renovation dust-lead testing is required, a certified lead inspector, certified lead risk assessor, or certified lead sampling technician must conduct dust-lead testing procedures.

The following information replaces all information on **page 27**

Post-Renovation Dust-Lead Testing

Dust-lead testing is conducted by certified lead-based paint inspectors, certified lead-based paint risk assessors, or certified lead dust sampling technicians. For homes receiving federal assistance, the post-renovation dust-lead testing must be done by a person independent of the renovation firm.

- Although optional under the RRP Rule, some states and localities may require post-renovation dust-lead testing. Also, a homeowner may specifically request that post-renovation dust-lead testing be performed in the contract. In this case, clean up the work area and check your work, then contact a certified lead-based paint inspector, risk assessor or lead dust sampling technician to arrange for post-renovation dust-lead testing.
- HUD requires dust-lead testing after renovation or repair work in pre-1978 homes receiving federal assistance, which are regulated under the Lead Safe Housing Rule. Contractors must determine whether the home is federally-assisted. Federal assistance may be channeled through a state or local government, community development corporation or other similar entity.

- Post-renovation dust-lead sampling for interior jobs will consist of a floor sample taken in each room where work was performed (to a maximum of four samples) and an additional sample on the floor outside the entry to the work area. Where window sills and window troughs were present in the work area, a window sill or window trough sample will be collected in each room where work was performed (to a maximum of four samples).

All dust-lead samples must be sent to an EPA-recognized dust-lead laboratory for analysis. You can view the list of laboratories at <https://www.epa.gov/lead/nllap>.

The following information replaces all information on **page 28**

Interpret the Dust-Lead Testing Results

The laboratory will report the amount of lead in the dust. A dust sample at or above the following limits means the area is not ready for reoccupancy:

- Floors: 5 micrograms per square foot
- Window sills: 40 micrograms per square foot
- Window troughs: 100 micrograms per square foot

If the laboratory report shows lead levels at or above these thresholds, the home fails the post-renovation dust-lead test. The home must be cleaned and retested until compliance with the dust-lead action levels is achieved.

If a homeowner decides they want post-renovation dust-lead testing performed, it is a good idea to specify in the initial contract, before the start of the job, that dust-lead testing is to be done and who will do the testing, as well as whether re-cleaning will be required based on the results of the test. No one besides the contractor and the person taking the dust samples should enter the work area until the area has met the dust-lead action levels and, where applicable, any other lower regulatory levels (e.g., from state or local laws).

The following replaces information regarding exceptions on **page 32**

Are there any exceptions? The requirements do not apply to housing designated for elderly or disabled persons, zero-bedroom dwellings (studio apartments, dormitories, etc.) unless a child under six years of age resides or is expected to reside there, housing determined to be free of lead-based paint by a lead-based paint inspection, emergency renovations and repairs, and minor repairs that disturb six square feet or less of paint on interior surfaces or 20 square feet or less of paint on exterior surfaces. The minor repair exemption does not apply to projects involving demolition, window replacement, or involve the use of any of the practices prohibited by the RRP Rule.