



New York State Division of Housing and Community Renewal
25 Beaver Street
New York, NY 10004

HOUSING MANAGEMENT BUREAU MEMORANDUM #2010-C-03

To: All Housing Authority Chairpersons and Executive Directors
All Housing Company Owners, Managing Agents and Site Managers

From: Robert Damico, Downstate Director
Joe Fryer, Upstate Director, Housing Management Bureau

Date: June 23, 2010

Subject: EPA Renovation, Repair and Painting Rule - Extension
RRP & Lead Safe Work Practices - Training
New York City – Standpipe & Sprinkler Local Laws

This an informational bulletin to help affected housing companies and authorities address new laws and their implementation as they come up. Please inform your professional consultants and staff of the new rulings, and contact your DHCR Housing Management representative for further information. We hope the information is helpful.

1. The enforcement date for EPA's Renovation, Repair, and Painting (RRP) Rule has been extended to October 1, 2010 in accordance with the attached letter from EPA. The RRP Rule requires maintaining lead-safe work practices (LSWP) during any work which involves disturbing interior or exterior finishes in pre-1978 and non-senior citizen housing, as well as in day-care facilities and schools. Additional information on this Rule can be found at www.epa.gov/lead/pubs/renovation.htm.
2. The training required by the RRP Rule is available free of cost to DHCR supervised housing company and authority personnel, and contractors under contract with DHCR supervised developments. Although capacity and locations are limited, please contact Diane Dembling in our Office of Community Development at (518) 473-3540 for details on this opportunity or review DHCR's web site at <http://nysdhcr.gov/General/Training>.
3. For New York City developments only – Local Laws 58, 60, 63 and 64 impacting fire standpipe and sprinkler piping go into effect in 2010. See the attached NYC Buildings Department bulletin for information.

Thank you,

A stylized, handwritten signature of Robert Damico in black ink.

Robert Damico

A handwritten signature of Joe Fryer in black ink, written in a cursive style.

Joe Fryer



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

JUN 18 2010

OFFICE OF
ENFORCEMENT AND
COMPLIANCE ASSURANCE

MEMORANDUM

FROM: Cynthia Giles *Cynthia Giles*
Assistant Administrator
Office of Enforcement and Compliance Assurance

TO: OPPTS and Enforcement Division Directors
Regions 1 – 10

SUBJECT: Further Implementation Guidance for the Renovation, Repair and Painting Rule

The purpose of this memorandum is to provide supplemental guidance to the Regions on enforcement of the Renovation, Repair and Painting Rule (RRP Rule) and the Amendment to the Opt-out and Recordkeeping Provisions in the Renovation, Repair, and Painting Program. Since the RRP Rule became effective on April 22, 2010, concerns have been raised by the regulated community regarding difficulties experienced in obtaining the rule required firm certification and renovation worker training.

Acknowledging those concerns and to facilitate the transition to full implementation of the RRP Rule, EPA will offer additional and sufficient time for renovation firms and workers to obtain the necessary training and certifications to comply as follows:

- Until October 1, 2010, EPA will not take enforcement action for violations of the RRP Rule's firm certification requirement.
- For violations of the RRP Rule's renovation worker certification requirement, EPA will not enforce against individual renovation workers if the person has applied to enroll in, or has enrolled in, by not later than September 30, 2010, a certified renovator class to train contractors in practices necessary for compliance with the final rules. Renovators must complete the training by December 31, 2010.

In view of the paramount importance of ensuring that all contractors follow the lead-safe work practices in the RRP rule, EPA will continue to enforce the work practice requirements in the rule which protect children and reduce lead exposure. Information

concerning lead-safe work practices can be found at
<http://www.epa.gov/lead/pubs/renovation.htm#requirements>.

EPA issued the Lead RRP rule because a disturbing number of America's children are still poisoned by lead-based paint in their homes-leading to learning and behavioral disorders. EPA considers the certification and training requirements important to ensure that firms are protecting children and other residents while renovations are on-going. Information about training is easily accessible on EPA's web site at <http://www.epa.gov/lead/pubs/training.htm>. To date, these training providers have offered more than 15,000 classes and trained 300,000 people. The Agency believes, however, that allowing additional time for firms and individuals to obtain that training and certification will facilitate compliance with the rule. The Agency appreciates the many unique challenges around the country, including numerous disaster declarations, and is committed to encouraging additional training opportunities in every state in order to meet the demand for classes.

Thank you for your continued focus on implementation of this important rule.

cc: Adam Kushner
Lisa Lund
Wendy Cleland-Hamnett
Maria Doa
Leslye Fraser
Brenda Mallory

STANDPIPES + SPRINKLERS

New Safety Regulations

New standpipe and sprinkler piping laws go into effect in 2010. Building owners and contractors must be sure their properties and projects comply with these new local laws.

The Buildings Department participated in the multi-agency advisory group that proposed these new safety standards. Mayor Michael R. Bloomberg appointed Deputy Mayor Edward Skyler to lead the Construction, Demolition and Abatement Working Group, which generated 33 safety recommendations – including the four local laws described here.

To learn more, read *Strengthening the Safety, Oversight and Coordination of Construction, Demolition and Abatement Operations*, available at nyc.gov/buildings.

CUTTING AND CAPPING

Local Law 60/09, effective 3/2/2010.

Permits are required to cut and cap standpipes or sprinklers.

- **Authorized Licensees:** Only licensed master plumbers or licensed master fire suppression piping contractors may cut and cap standpipes or sprinklers during demolition.
- **Local Law Incorporates TPPN 3/07:** For demolitions and gut rehabilitations, a registered design professional must have a variance to remove damaged or inoperable sprinklers. This filing must include a damage report and explanation why the system can't be restored. (The design professional must first file the variance with the Fire Department and have FDNY approval before filing it with the Buildings Department.)

COLOR CODING

Local Law 58/09, effective 3/2/2010.

Existing buildings must comply by 6/2/2010.

All exposed standpipes and sprinkler piping must be painted red. The law outlines specific exceptions, such as branch piping.

All buildings – no matter the size or occupancy – must comply with these new requirements.

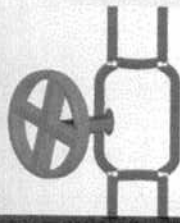
Dedicated standpipe valve handles must be painted **red**.



Combination standpipe valve handles must be painted **yellow**.



Dedicated sprinkler valve handles must be painted **green**.



COLOR CODING CERTIFICATION

Buildings Under Construction

The special inspector will confirm compliance before the walls are enclosed.

Existing Buildings

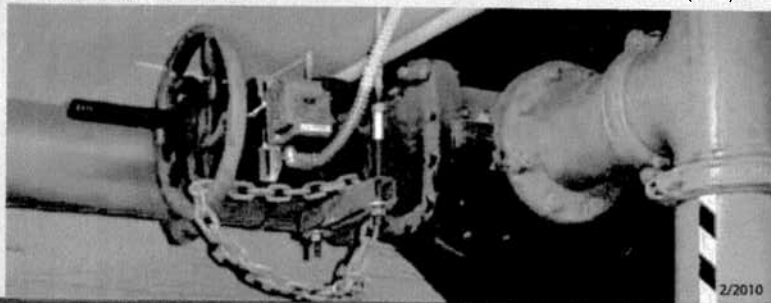
Owners of buildings with exposed sprinkler piping and standpipes must comply and hire one of four types of contractors to certify the color coding:

- Licensed master plumbers;
- Licensed master fire suppression piping contractors;
- Registered design professionals; or
- People with the appropriate Fire Department Certificate of Fitness.

PROOF OF COLOR CODING CERTIFICATION

The color coding certification must be kept on the premises at all times for Buildings and Fire Department inspection. Visit nyc.gov/buildings for the certification form, available online in March 2010.

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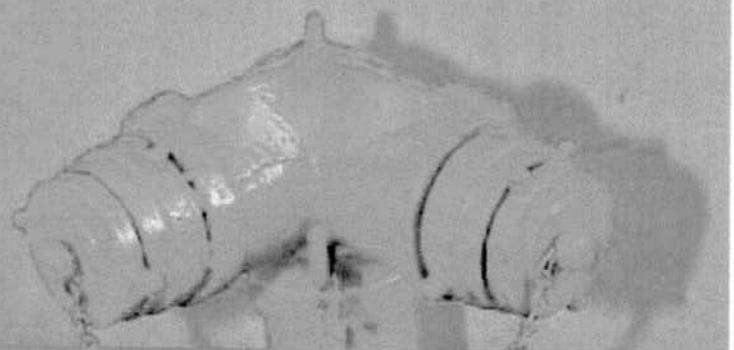


PRESSURE TESTING

Local Law 63/09, effective 2/4/2010.

Freezing temperatures can damage a pressurized system. Compressors without air dryers generate moisture in the line, which can freeze. Exposed valves can also freeze – causing the system to depressurize and triggering the alarm.

- **New or Altered Sprinkler Systems:** A licensed master plumber or licensed fire suppression piping contractor must conduct hydrostatic pressure testing.
- **New or Altered Standpipe Systems:** A licensed master plumber or licensed fire suppression piping contractor must conduct hydrostatic pressure testing. (Read Local Law 63/09 for limited exceptions in freezing conditions.)
- **Removing Stories:** A licensed master plumber or licensed fire suppression piping contractor must conduct hydrostatic pressure testing before work begins.
- **New Buildings Under Construction:** An initial standpipe hydrostatic pressure test must be performed when the building reaches 75 feet high; additional tests are required when the building reaches 175 feet high and every 100 feet thereafter.
- **Enlargement Triggering a New Standpipe System or Addition to an Existing Standpipe System:** A hydrostatic pressure test is required at every 75 feet in height added to the system.



STANDPIPE PRESSURIZED ALARM SYSTEMS

Local Law 64/09, effective 2/4/2010.

- **Vacant Buildings Being Demolished:** Existing standpipes must be dry standpipes and have an air-pressurized alarm.
- **New Buildings Higher Than 75 Feet:** Temporary and permanent dry standpipes must have an air-pressurized alarm.
- **Prior Notification for Scheduled Work:** Contractors must notify the Fire Department before any planned alarm deactivation.
- **Out of Service Standpipes:** Contractors must notify the Fire Department.
- **Site Safety Manager's Log:** Alarm activations, inspections and repairs must be logged.
- **Installation Applications:** A registered design professional must file the application.
- **Installation Permits:** A licensed master plumber or licensed master fire suppression piping contractor and a licensed electrician must have a permit.

