

EPA's RENOVATOR, REPAIR & PAINTING RULE

The EPA RRP rule affects contractors, property managers and other building professionals 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. Training, certification, and work practice requirements in the **Renovation, Repair and Painting Rule are effective April 22, 2010.** Pre-renovation education requirements are effective now!"

Firms must have one or more "Certified Renovators" assigned to jobs where lead-based paint is disturbed. To become certified, a renovator must successfully complete an EPA or State-approved training course conducted by an EPA or a State-accredited training provider. **All renovation workers must be trained.** Renovation workers can be trained on-the-job by a Certified Renovator to use lead safe work practices, or they can become Certified Renovators themselves.

HUD LEAD SAFE HOUSE RULE

HUD's Lead Safe Housing Rule (24 CFR Part 35) covers pre-1978 federally-owned or assisted housing and federally-owned housing that is being sold. It does not cover child-occupied facilities outside of residential housing. The requirements of HUD's rule are similar to EPA's RRP rule, but there are some differences in the de-tails, including:

Exemptions. HUD's rule does not allow owners of federally-assisted housing to opt out of its requirements.

Training Requirements. HUD does not recognize on-the-job training. To conduct lead hazard control in federally-assisted housing, either all workers must have completed a HUD-approved course, or the crew must be supervised by a Certified Renovator who is also a Certified Lead Abatement Supervisor.

Minor Repair and Maintenance. HUD's definition of minor repair and maintenance that is exempt from its rule is different than EPA's (2 square feet interior and 20 square feet exterior or 10 percent of the surface area of a small building component type).

RENOVATOR CERTIFICATION

(1) To become a certified renovator, an individual must successfully complete the appropriate course accredited by EPA under § 745.225 or by an authorized State or Tribal program. The course completion certificate serves as proof of certification.

(2) Individuals who have successfully completed an accredited abatement worker or supervisor course, or individuals who have successfully completed an EPA, HUD, or EPA/HUD model renovation training course, may take an accredited refresher renovator training course in lieu of the initial renovator training course, to become a certified renovator.

(3) To maintain renovator certification, an individual must complete a renovator refresher course accredited by EPA under § 745.225 or by an authorized State or Tribal program within 5 years of the date the individual completed the initial course described in paragraph (1) of this section. If the individual does not complete a refresher course within this time, the individual must re-take the initial course to become certified again.

(4) The renovators must have with them at the work site copies of their initial course completion certificate and their most recent refresher course completion certificate.

What if I don't comply? Penalties of Civil & criminal of **\$37,500.00 fine** per occurrence and up to one year jail time! For more information check out:

<http://www.epa.gov/lead/pubs/renovation.htm>.