

RRP Enforcement Update
October 4, 2010

Many believe that October 1, 2010 marks the first day of EPA enforcement for the Renovator, Remodel, and Painting (RRP) Rule. But according to EPA Region 6, offices in Dallas, TX, enforcement of the RRP has been taking place since April 22, 2010. They described the enforcement prior to October 1, 2010 as limited and specific. The majority of the violations have been a result of not following the RRP lead safe work practices. Through working with contractors in training and on job sites, we are finding several reoccurring issues. These issues could result in EPA enforcement actions. Take a moment and check that you are following the correct requirements.

- **Don't hand out the wrong pamphlet.** The Renovate Right pamphlet changed. The old pamphlet had a date of March 2008 on the back green cover with 3 pictures of families on the front with a large Victorian porch. The new pamphlet is pink with a young girl facing a lead regulated interior work area. The date on the new pamphlet is April 2010.
- **Test the right houses.** Houses constructed after 1978 are exempt from the RRP and don't require testing. If the house was constructed in 1977 or before, test or assume. Take the time to find out the date of construction. It is not good company policy to test every houses regardless of age, it only raises costs and irritates clients. We have had many homeowners inquiring about the rule and asking why is the contractor testing the house if it was constructed in 2002.
- **Get the correct certification.** There are 2 certifications that are required and they are not the same. One is for the individual and the other is for the company. At least 1 RRP Certified Renovator is required at each job site. Certification involves taking a 1-day class from an EPA Accredited Training Provider such as AEHS. State Certified Lead Abatement Supervisors and Workers must also become RRP certified, but they only need to take a 1/2 day refresher class. In addition to individual certification, each firm, agency or non-profit must also become RRP certified. Note: This includes city agencies and school districts as well as small "one-man-band" handymen and owners of rental property. Firms or "entities" must submit an application and pay EPA a fee (\$300) which is good for 5 years.
- **Document, document, document.** Take the time to document according to the Rule and keep the documentation for 3 years. Use the EPA forms for the documentation. You can make simple changes to make it your own. Documentation is the easiest area for EPA to enforce upon. Don't get caught without it.

All necessary RRP documents are available on our website at www.aehs-sa.com/Training_RRP

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