

EPA RRP Trainer Newsletter

January 7, 2016

The content of this newsletter is for EPA administered jurisdictions only. This includes all but 14 states that operate their own RRP program. See "Authorized State" topic below for information.

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Need Assistance?

Enforcement

On October 27, 2015 EPA announced 75 enforcement actions from the past year that require renovation contractors and training providers to protect people from harmful exposure to lead dust and debris, as required by EPA's Lead-based Paint Renovation, Repair, and Painting (RRP) regulations. [Read the press release](#). Be sure to stay current with certification and training requirements and to work lead-safe!

Training Course Notification

As you know EPA requires accredited training programs to [notify the Agency](#) prior to, and following completion of lead-based paint renovator and dust sampling technician courses. Currently, about 80% of these submissions are done online using EPA's CDX system. Submission via CDX is quick, easy and free.

If you're new to CDX, you'll need a customer retrieval key, which you can obtain by calling the CDX helpdesk at 1-888-890-1995. Once you have the customer retrieval key, go to the [CDX website](#), complete your registration, and start submitting notice online today.

Apply Now to Expand into E-Learning

On January 14, 2015, [EPA published a proposal](#) to eliminate the requirement for hands-on training in the renovator refresher course. A final decision on the proposal will be made early this year. If the Agency decides to eliminate the requirement for hands-on

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training in the renovator refresher course, training providers would be able to teach the class entirely online without the need for conducting the hands-on skill sets in a classroom. Training providers that are accredited for the current version of e-learning renovator refresher course would not have to apply for an additional accreditation in order to teach the online training without hands-on learning. Their accreditation for the current version of the e-learning refresher training would allow them to teach the online refresher if the hands-on requirement is eliminated. [Apply here.](#)

Change to application process

Effective September 15, 2015 EPA will no longer offer the option of submitting lead program applications by mail. This applies to all [individual](#), [firm](#) and [trainer](#) applications required by EPA's lead renovation and abatement programs. After that date all applications, payments, updates and certificate replacement requests will be done online using the Agency's Central Data Exchange (CDX) system. This change is part of an Agency effort to decrease cost and increase efficiency. Although this option was only recently added for individuals and trainers, it has been available to firms for some time. At present, nearly 90% of firm applications are submitted online. Acceptable methods for payments online include credit card, debit card, or electronic check.

Renovator training expiration extended

EPA has [extended the training expiration date](#) for many individual certified renovators. This was done so if the [proposed changes to recertification training of January 2015](#) are finalized, many more renovators will be able to take advantage of those changes. Affected

expiration dates are based on when the previous course was taken.

EPA will not be issuing new course completion certificates or other documentation to renovators saying their expiration was extended. If an employer or customer has questions about the extension the renovator can print out [this guidance](#) and show it to them, or have them call the National Lead Information Center at 800-424-5323.

Note: The extensions do not apply to firm certifications.

Firm certification

It has come to our attention that some renovation firms have trained employees but the firm itself is not certified. While student training is an important aspect of the regulation, all businesses providing regulated renovation activities must be certified (even sole proprietorships). [Firm certification](#) involves the submission of an application and fee to EPA. Please help us and your students by emphasizing that training is only one step of the certification process, and that the firms they work for must also be certified.

Frequent question database (FQ database)

EPA maintains a list online of [Frequent Questions](#) regarding the Agency's Lead Program. It is regularly updated to ensure that you have access to the very latest information. When questions come up we recommend you first review the Frequent Questions, then if you cannot find the answer you're looking for call the National Lead Information Center at 1-800-424-LEAD (5323).

Here's an example from the FQ database. I own a sole proprietorship, and I plan to get trained and certified as a certified renovator. Will that be sufficient since I have no employees? The answer is "no, you must get certified as a renovation firm as well". Take a look at [FQ 23002-18123](#) for more details!

Authorized states

To date, EPA has authorized 14 states to run their own renovation programs. Renovators and firms that only work within an authorized state(s) must be certified by each authorized state in which they do work, and would not be required to be certified by EPA. The authorized states are [AL](#), [DE](#), [GA](#), [IA](#), [KS](#), [MA](#), [MS](#), [NC](#), [OK](#), [OR](#), [RI](#), [UT](#), [WA](#) and [WI](#).

If an individual renovator is certified by an authorized state they are also qualified to work in EPA administered states, with no additional training. EPA certified renovators wishing to work in an authorized state should contact the state to determine if additional training/certification is necessary.

Regardless of whether a firm is certified by an authorized state, if they do work in an EPA administered state they must be certified by EPA.