



Newsletter for RRP Contractors

January 12, 2017

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.

In This Issue

Enforcement
Inspection Manual
Testing prior to renovation
Firm re-certification
Make sure you see important emails from EPA
Check the status of your firm application
Renovator refresher training
Renovator training expiration extended
Authorized states
Frequent question database (FQ database)

Useful Info & Instructions

[Renovation Regulations](#)
["Look for Logo" Materials](#)

Major Enforcement Announcement

EPA and the Department of Justice (DOJ) announced a settlement with Sears Home Improvement Products Inc. that resolves alleged violations of the federal Lead Renovation, Repair and Painting (RRP) Rule for work performed by Sears' contractors during home renovation projects across the country. Under the settlement, Sears will implement a comprehensive, corporate-wide program to ensure that the contractors it hires to perform work minimize lead dust from home renovation activities. Sears will also pay a \$400,000 civil penalty. [Read more.](#)

New Inspection Manual Now Available

EPA's Office of Compliance has revised the [Inspection Manual for the Lead Renovation, Repair and Painting \(RRP\) Rule](#). The RRP Inspection Manual establishes uniform guidance for EPA-credentialed inspectors who conduct inspections to monitor compliance with the RRP Rule. Compliance monitoring activities for the RRP Rule include work site inspections, records reviews of renovation firms, and auditing training provider courses that certify renovators.

[Certification Information](#)

[Find a Trainer or Course in Your Area](#)

[RRP Firm Materials](#)

[Logo Use Guidelines](#)

[Lead in the News](#)

Need Assistance?

[Frequent Questions Database](#)

[National Lead Information Center](#)

Contact Us

www.epa.gov/lead

[EPA Regional Contacts](#)

Testing prior to renovation

Is lead paint testing required under RRP? No, a firm may always assume the presence of lead-based paint and proceed in accordance with all RRP requirements.

What must be tested if a renovator uses test kits to determine if lead paint is present for a job? A certified renovator using EPA-recognized test kits to determine if the RRP work practices apply must test each building component affected by the work even if they are in the same room. For example, if a room contains three windows whose paint will be disturbed the renovator must test each window to determine if lead is present. Some examples of interior components include: ceilings, crown molding, walls, chair rails, doors, door trim, floors, fireplaces, radiators, shelves, stairs, windows and trim.

The only exception to this requirement is when components make up an integrated whole. For example, the components of a window can be grouped as follows: (1) the window assembly and (2) the window trim. Window assembly components include the sashes, stops, head, jambs, sill or stool, and trough. So, for an interior job where the window assembly and trim will be disturbed, it's necessary to test both the window assembly and the window trim. Please note that this would not apply where it's obvious that the components have been repainted or refinished separately, in that case each component would require a separate test. For more information on testing, take a look at the testing sections in our [Frequent Questions document](#).

Firm re-certification

As discussed previously, firms that disturb painted surfaces in homes and child care facilities built before 1978 are subject to EPA's renovation regulation and likely require firm certification. These firm certifications expire every five years. Firms must apply for recertification to extend their certification an additional 5 years. Firms are encouraged to apply early, at least 90 days before their expiration, to ensure their application is processed before they expire. You won't be penalized for applying early, just be sure to select "re-certification" and your new 5-year certification won't begin until your current certification expires. [Click here](#) for information about applying for re-certification.

Make sure you see important emails from EPA

Much of the correspondence sent by EPA (including final approval packages) are delivered by E-mail from lead.paint@epa.gov. To help ensure the timely receipt of E-mail correspondence, we recommend you add the lead.paint@epa.gov email address to your contacts to ensure it arrives in your inbox rather than a SPAM folder.

Use EPA's E-Enterprise site to check the status of your firm application, and to download your certificate and logo for up to 12 months after approval

EPA's E-Enterprise site allows you to check the status of your firm certification application, download a copy of a recently issued certificate or retrieve your customized

lead program logo. To access the site, you should go to [EPA's E-Enterprise portal](#), login in with your CDX user name and password, then go to the "progress tracker" section. From the "progress tracker" section you'll be able to see the status of your application and, if complete, download your certificate and customized program logo. Certificates and logos are now available on the site for 12 months following issuance. If you need a replacement after that you'll need to submit a [certificate replacement request](#) online.

Renovator refresher training

As mentioned last time, a renovator must take the 4-hour refresher course before the expiration of their current training, or they'll need to retake the 8-hour initial course to be certified again. Renovators must submit a copy of their current training course completion to the trainer to be eligible to take the refresher course.

Renovator refresher training can be done with or without a hands-on component. The version without hands-on training can be done entirely online! Review your options below, and when ready, use our [trainer search tool](#) to find trainers offering the option you're interested in.

	Lecture	Hands-on	Course test	Certification period
With hands-on training	In person	In person	In person	5 years
	Online	In person	In person	5 years
No hands-on training	Online	N/A	Online	3 years***

*** If you choose to recertify via an online course that does not include hands-on training (3-year certification), you must select an option with hands-on training (5-year certification) for your next recertification. The 3-year recertification option (i.e., no hands-on training) cannot be selected for back-to-back trainings.

Renovator training expiration extended

If you received your renovator training before April 1, 2011 please note that EPA [extended your training expiration date](#). To determine when your renovator training expires [refer to this table](#). Expiration dates are based on when the previous course was taken. Renovators must take the refresher training before their training expiration in order to have valid certification.

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.

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. [Click here](#) to see the FQ's related to this topic.

Frequent question database (FQ database)

As you know, 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. If a renovator disrupts 6 square feet or less of painted surface per room in a several rooms inside one property, does the RRP Rule apply? The answer is "no", as long as 1) no prohibited work practices are used, 2) the work does not involve window replacement or demolition of painted surfaces, and 3) the 6 square feet or less includes the area of all work done in the room in any 30-day period. Take a look at [FQ 23002-18381](#) for more details