



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Region 1
5 Post Office Square
Boston, MA 02109-3912

May 2, 2022

SUBJECT: RRP Enforcement Alert with Compliance Assistance and Education Resources

To All Interested Parties,

The use of lead-based paint in homes was banned in 1978, but did you know that almost 3 out of every 4 homes (73%) in Connecticut were built before 1980? Older housing stock in Connecticut means lead-based paint is a risk for Connecticut workers and families. There is no safe level of lead. Small amounts can cause lifelong harm. Lead paint and lead contaminated dust are the #1 causes of childhood lead poisoning. Protect your firm and the families you work for by being compliant with the Renovation, Repair and Painting (RRP) Rule.

Over the next year, representatives from the U.S. Environmental Protection Agency (EPA) Region 1 will focus their investigations on companies and contractors in Connecticut (CT) who conduct renovation, repair, and/or painting activities to determine compliance with EPA's lead-based paint RRP Rule. Furthermore, we hope to help address lead disparities in overburdened communities in CT. Your business has been identified as potentially performing such activities. EPA is coordinating these efforts with local and state officials and community groups.

What does the RRP Rule Require?

The RRP Rule applies to all individuals or firms performing renovation, repair, and/or painting projects that disturb painted surfaces in pre-1978 residential homes, schools, and childcare centers for compensation. Individuals or firms may include painters, carpenters, window replacement companies, remodelers, plumbers, electricians, and landlords/property managers who conduct their own repairs. Performing, offering, or claiming to perform renovation, repair, and/or painting work without proper firm certification from EPA is a violation of the RRP Rule. Violations of the RRP Rule may result in the issuance of penalties up to \$43,611 per violation.

Lead-based paint hazards, such as paint chips and dust, are often released and are not cleaned up properly when conducting renovations on pre-1978 housing and child occupied facilities. The RRP Rule is designed to certify and train companies on lead-safe work practices when completing routine home improvement, maintenance, repair, or renovation work. The RRP Rule should not be confused with lead abatement, which involves the permanent removal of lead hazards as ordered by the state and which has different requirements. The RRP Rule requires:

- renovation firms be certified by the EPA and employ certified RRP renovators trained in lead-safe work practices by an EPA-accredited training provider;
- pre-renovation notification to be given to homeowners and tenants;
- work be performed using lead-safe work practices; and
- records documenting compliance be maintained for 3 years.

EPA also enforces the Lead Disclosure Rule. This rule requires that landlords and sellers provide buyers and renters of pre-1978 housing with specific information about lead and lead hazards in the residence prior to buying or renting the residence. The rule also provides an opportunity for buyers to have an independent lead inspection. Sellers, landlords, and agents are responsible for compliance.

For additional information on how to comply with federal lead-based paint rules, the following document is attached: EPA R1's Renovation, Repair and Painting Rule Fact Sheet. **The fact sheet contains important information including how to receive the firm and renovator certifications required to comply with the RRP Rule.**

Online Lead Compliance Assistance and Education Resources

You will find various resources such as links to on-demand webinars, fact sheets, and additional web links to lead information at:

<https://www.epa.gov/ct/additional-r1-lead-resources>



Preventing lead exposure from paint, dust, drinking water, and soil is critical to protecting children's health

Lead Paint Disclosure in Homes

There are federal laws requiring lead-based paint disclosure that apply to landlords and home sellers. Before signing a lease for pre-1978 housing, landlords must provide renters an EPA-approved pamphlet on lead-based paint hazards, information about all known information on the presence of lead-based paint and have a Lead Warning Statement in the lease or sales agreement. Before selling pre-1978 housing, sellers must provide buyers with all the provisions for renters listed above, in addition to receiving a 10-day period to conduct a lead-based paint inspection. To learn more, visit: www.epa.gov/lead

Lead in Drinking Water

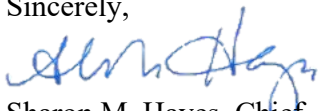
Lead can enter drinking water when plumbing materials that contain lead corrode. The most common sources of lead in drinking water are lead pipes, faucets, and lead solder (a metal mixture containing lead that is used to connect pipes). The most significant source of lead in the water typically comes from lead pipes called lead service lines. Lead pipes are more likely to be found in older cities and homes built before 1986. Among homes without lead pipes, the most common problem is with brass or chrome-plated brass faucets and plumbing with lead solder. To learn more, visit: www.epa.gov/safewater

Lead in Soil

The most frequent source of lead contamination in soil comes from lead-based paint chips and dust from homes and buildings. Former manufacturing sites and automotive facilities may also be contaminated because lead was used in many products, including gasoline. To stay safe from lead in soil, cover bare soil with grass or mulch and test soil brought from another site. Prevent lead-contaminated soil from entering your living space by removing shoes and dusty clothes. To learn more, visit: www.epa.gov/lead/learn-about-lead

In summary, the RRP Rule helps protect children and families from lead exposures in the home and in other child occupied facilities by requiring that firms engaged in renovation, repair, and/or painting projects that disturb lead-based paint are certified by EPA and follow lead-safe work practices. If you have questions or would like more information concerning compliance with federal lead laws, please contact Molly Magoon, EPA Region 1's Lead Enforcement Coordinator of my staff at magoon.molly@epa.gov or 617-918-1848.

Sincerely,



Sharon M. Hayes, Chief
Toxics, Pesticides & Drinking Water Compliance
Enforcement and Compliance Assurance Division

****Report lead-based paint violations****

Phone: 617-918-1111(Select #3 and then #2) or 888-372-7341

Online: <https://www.epa.gov/lead/reporting-violation-lead-paint-rules-new-england>