

## Changes to The EPA's New Lead Renovation, Repair and Painting Rule

The EPA's NEW Renovate, Repair and Painting (RRP) rule went into effect April 22, 2010. We want to emphasize that despite recent changes made to the rule, this regulation is very much in effect. The EPA is authorized to impose harsh fines and penalties for non-compliance with the rule, any knowing or willful violations of its provisions by contractors or firms may even result in imprisonment.

The rule applies to any work that involves the disturbance of lead-based paint in pre-1978 buildings, regardless, of whether the contractors or firms actually perform painting work or are labeled as painters. It is crucial therefore, for all contractors and firms performing renovation work to be familiar with the provisions of the regulation, and to ensure that they fully comply with the EPA's requirements.

Common renovation activities like sanding, cutting, and demolition can create hazardous lead dust and chips by disturbing lead-based paint, which can be harmful to adults and children. The covered facilities include residential, public, and commercial buildings where children under age 6 are present on a regular basis as well as all housing, owned and rented, constructed before 1978. The rule applies to renovation, repair, or painting activities. It does not apply to minor maintenance or repair activities affecting *less than* six square feet of lead based paint in a room or *less than 20* square feet of lead based paint on the exterior. NOTE: Window & Door replacement are NOT considered minor maintenance or repair and require certification.

The rule will affect paid renovators who work in covered pre-1978 housing and child-occupied facilities (as noted above), including (but not limited to):

- Renovation Contractors
- Maintenance Workers in Multi-Family Housing
- Landlords who self-perform work
- Painters
- Drywall Repair
- Roofers
- Window & Door Repair/Replacement
- Plumbers
- Electricians

Each renovation project covered by the final rule must be performed and/or directed by a **certified** renovator who has undergone the eight hour training class in an EPA-accredited training program or course who works for or is a certified firm.

National Econ Corporation is EPA-Accredited in English and Spanish. We provide instruction for certification across the United States and in Guam.

The EPA has stated that they will not take enforcement action for violations of the rule's firm certification requirement until October 1, 2010, and will not enforce certification requirements against individuals if they enroll in a certified renovator class prior to September 30, 2010 and complete the training by December 31, 2010.

The EPA will continue to take enforcement for all other actions under the regulation. You should NOT be conducting work on pre-1978 housing and child-occupied facilities without being in compliance.

*Santiago Concepcion is the Senior Project Manager & Assistant Training Director for National Econ Corporation - A leading environmental consulting & training firm located in Anaheim, CA. National Econ Corporation provides the EPA-Accredited Renovation, Repair & Painting (RRP) initial & refresher courses. For more information visit [nationalecon.com](http://nationalecon.com) or call 877-NAT-ECON, or email the author at:*

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