

To: VHCB Housing Partners

From: Ron Rupp, Program Director
VHCB Lead Program

Date: February 8, 2010

Re: EPA Renovation, Repair and Painting (RRP) Rule - Training and Licensing

Despite the efforts of VHCB and others to convince AHS/Health Dept. to integrate the RRP rule into Vermont's lead paint regulations, it appears increasingly unlikely that this will happen any time soon. Since the RRP rule takes effect this coming April 22nd, this means that both state and federal lead paint regulations will have to be followed independently. Property maintenance staff and contractors who disturb paint in the course of their work in pre-1978 properties will have to be trained and licensed by EPA to do so.

The EPA training is now available in Vermont and surrounding states from numerous providers. At this time the VHCB Lead Program is able to reimburse our non-profit partners for the cost of training and licensing their employees. Organizations should make arrangements to have appropriate staff take this training as soon as possible. A partial list of approved training providers can be found at the end of this memo, and a complete list is available at www.epa.gov/lead/pubs/trainingproviders.htm. VHCB is also listing some RRP training opportunities on our web site at www.LeadSafeVermont.org. This is an 8 hour training.

While the RRP rule allows someone who has completed the RRP course to train other employees in the organization, a licensed individual must directly supervise all regulated work. Therefore it is prudent for organizations to train as many property maintenance staff as possible to have maximum flexibility to complete maintenance and repairs promptly. Our offer of reimbursement for training and licensing costs will be good at least through this summer, but cannot be assured after that.

The way the RRP rule is structured, your organization will have to become a licensed EPA renovation firm. You will have to apply for this license from EPA Boston and the associated fee is \$300. This license will have to be renewed every 5 years and certified employees will have to take a 4-hour refresher course. Your employees who attend the RRP training will receive detailed information about licensing, record keeping requirements, and other aspects of the rule.

VHCB will reimburse your organization upon presentation of a paid invoices for training and the EPA license fee. VHCB will not cover costs of food, beverages, lodging, mileage, travel, salaries or other expenses associated with the training.

Please note that all of the requirements of Vermont's lead paint law must also still be followed, including the EMP training, inspections for deteriorated paint, cleaning at unit turnover, and submission of annual compliance statements.

Partial List of RRP Training Providers

ATC Associates, Inc.
Williston, VT
(802) 862-1980

American Indoor Air Quality Assessment Services
Randolph, VT
(802) 728-4015

Environmental Compliance Services
Agawam, MA
(413) 789-3530

Terese Churchill, CIH
Barton, VT
(802) 673-3369

Please note this is not a Vermont-specific training, therefore it can be taken with any EPA approved training provider in any state. Many training providers are approved to give the course nationwide.

We will keep you updated on the implementation of this Rule. Please feel free to contact me at 828-2912 or ron@vhcb.org if you have any questions.