

# EPA RRP Trainer Newsletter

Jan. 23, 2015

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## Proposed Rule Change

On January 14, 2015, EPA published a proposed rule to make several minor revisions to the RRP and Lead-based Paint Activities Programs. The revisions will improve the day-to-day function of the programs by reducing burdens to industry and EPA, and clarifying language for training providers. The public has until February 13, 2015 to submit comments on the rule. You can find information about the rule and a link to the Federal Register notice on EPA's Lead Program website at <http://www2.epa.gov/lead/newsroom>.

First, EPA is proposing to eliminate the requirement that the renovator refresher training course have a hands-on component under the RRP program. Eliminating the hands-on requirement would give renovators easier access to trainings saving them time and money and possibly resulting in a higher number of renovators taking the refresher course. Second, the Agency is proposing to remove jurisdictions under the abatement program. Eliminating jurisdictions would lower burden and costs for applicants because they would send fewer applications and pay less in fees. Third, EPA is adding clarifying language to the requirements for training providers under both the RRP and abatement programs. Adding language to clarify what

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<http://www.epa.gov/lead>  
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constitutes a violation would make the regulations consistent with other lead-based paint program regulations. This would not change any requirements for training providers. In addition to these revisions, the Agency is requesting comment on extending the renovator recertification deadline until this rule can be finalized so more renovators can take advantage of the rule.

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## EPA's "Look for the Logo" campaign

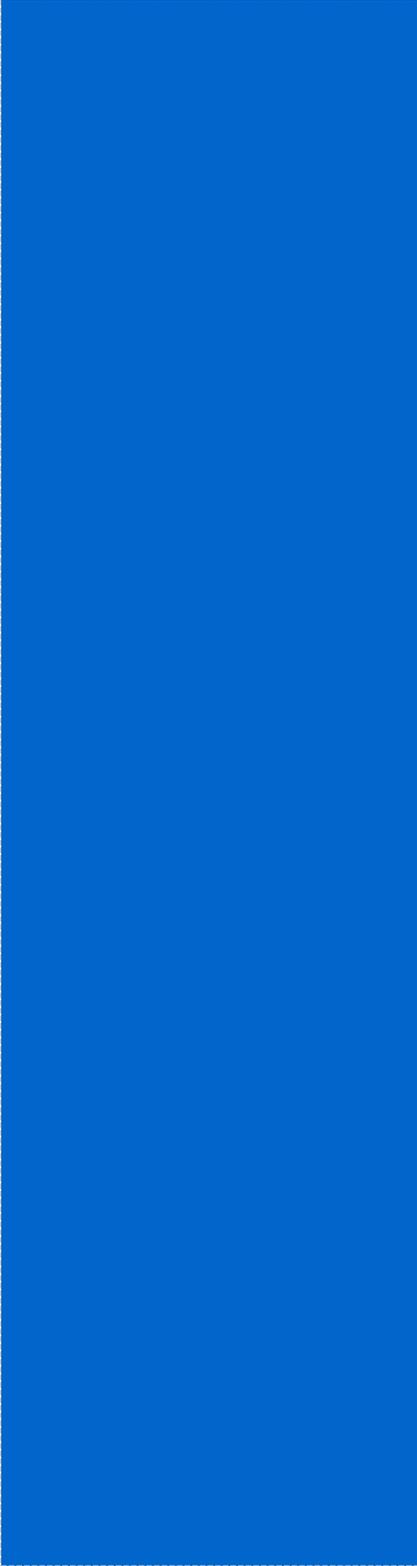
As you know, EPA's Renovation Rule requires firms working in older homes and child care facilities to be certified, train their employees, and follow lead-safe work practices. To help ensure consumers hire Lead-Safe Certified firms, help us spread the word about EPA's new outreach materials to remind everyone to "Look for the Logo"! For more information or to download the materials for free, [click here](#).

Help us encourage consumers to "Look for the Logo" and better understand the value of trained and lead-safe certified contractors. Feel free to place the widget on your webpage and highlight the print ad in an upcoming newsletter or email, and to encourage your trainees to do so as well.

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## Enforcement

On December 19, 2014 EPA announced 61 [enforcement actions](#) 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) standards. [Read the press release](#). Be sure to stay current with certification and training requirements and to work lead-safe!

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## **Renovators certified but not firms**

Some renovation firms have trained employees but don't realize the firm must be certified. 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. [Click here](#) for information about firm certification.

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## **Eligibility for refresher training**

A certified renovator or dust sampling technician is eligible to take the refresher course if the course is completed before their previous certification expires. The trainer must collect a copy of each student's prior course completion certificate demonstrating their eligibility to take the refresher course. The trainer must retain these training certificates for a period of 5 years.

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## **Renovator certification expiration date**

Renovator certification is typically for 5 years from the date of course completion. However, in 2009, EPA extended the 5-year certification of renovators who took an EPA accredited renovator training before April 22, 2010 until July 1, 2015. The extension ensured that renovators who received training early, before the regulations work practice standards were effective, weren't penalized for doing so.

Renovators seeking re-certification who complete a 4-hour refresher training before the expiration of their current certification are certified for a period of five years from the date they complete the refresher course, not from the date of expiration of their previous certification. Renovators will have to take the 8-hour course if they fail to take the refresher training before the expiration of their current certificate.

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## **Amending your application**

If your application information changes, you must submit an amendment within 90 days. Most changes are effective upon submission, except:

- 1) If you add a training manager or principal instructor they must wait up until the amendment is approved or 30 days have passed before providing training. However, if they were previously approved under another

accreditation, they may provide training on an interim basis until approved.

2) If you add a permanent training location you may use the new location on an interim basis until the amendment is approved or 30 days have passed.

To amend an accreditation, a training program must submit a completed [application](#) signed by the training manager, noting on the form that it is an amendment and indicating the information that has changed.

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## **When using test kits, what must be tested?**

A certified renovator using EPA-recognized test kits to determine if the rule applies must test each building component affected. The only exception to this requirement is when the components make up an integrated whole, where one or more components represent a system of components.

A staircase, for example, is made up of numerous repeating components which can be grouped into the following integrated wholes for testing purposes: (1) treads and risers, (2) balustrades, (3) newel posts, (4) railing caps, and (5) stringers. A single individual staircase component (e.g., a baluster) may represent the remaining staircase components of the same group (i.e., the rest of the balustrades on the staircase) unless it is obvious to the renovator that the

components have been repainted or refinished separately.

Windows and doors are another example of the integrated whole concept, refer to [FQ 23002-33377](#) for more information about testing window and doors.

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## **Frequent question database (FQ database)**

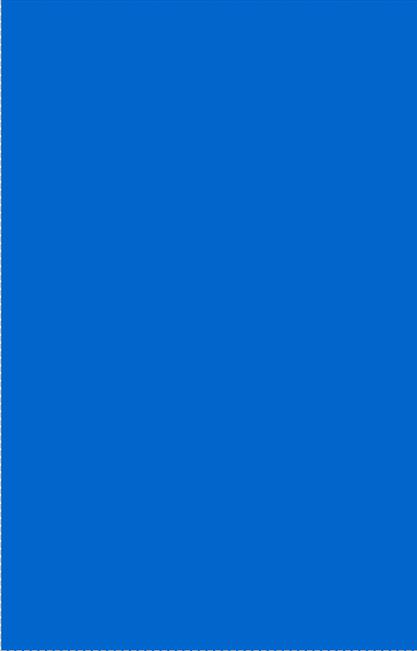
EPA maintains an online database of [Frequent Questions](#) regarding the Agency's Lead Program. It is regularly updated to ensure that you have access to the very latest information. When questions come up we recommend you first go to the FQ Database, then if you cannot find the answer you're looking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

Here's an example from the FQ database. Can an accredited training provider administer the final course assessment in an "open book" format? The answer is "no", surprised? Take a look at [FQ 23002-35003](#) for more details!

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## **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.



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.