## **EPA RRP Trainer Newsletter**

October 5, 2016

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.

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#### **Enforcement**

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.

### **CDX** enhancements for trainers

Coming October 2016, the CDX system is adding a new Training Provider Dashboard. The dashboard will allow trainers to manage their accreditation(s), submit training notifications, add or remove

instructors/managers/facilities, and update their information from one convenient location. When available, the dashboard will be accessible from your MyCDX homepage by clicking the "New! Training Provider Dashboard" link.

Additional functions will be added to the dashboard in the future, including redesigned accreditation applications, the ability to request replacement certificates, a personalized to-do list, and more.

## Need Assistance?

**Frequent Questions** 

National Lead Information Center

#### **Contact Us**

https://www.epa.gov/lead EPA Regional Contacts

### **Inspection Manual**

EPA's Office of Compliance has revised the <u>Inspection Manual for the Lead Renovation</u>, <u>Repair and Painting (RRP) Rule</u>. 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.

### Renovator refresher training options

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 demonstrate their eligibility 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! Renovators can use EPA's <u>trainer search tool</u> to find trainers offering both in person and online training.

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

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

## Providing refresher training online

As mentioned previously, trainers can be accredited to provide renovator refresher training online, either with or without a hands-on component. Refresher renovator training with a hands-on component leads to a five year certification. Refresher renovator training without hands-on can be done entirely online but leads to only a three year certification, and the next time around the renovator must take a refresher with a hands-on component. Renovators can find E-learning providers using our online trainer search tool. Go to our training provider page for information about accreditation and to request a copy of the model E-learning curriculum.

Note: Should you decide to offer the renovator refresher training without hands-on please note that the notification requirements for this type of training were updated. <u>For more information</u>.

#### **Application process going green**

As we mentioned last time, all lead program applications must be submitted electronically rather than by mail. This applies to all <u>individual</u>, <u>firm</u> and <u>trainer</u> applications required by EPA's lead renovation and abatement programs. All applications, payments, updates and certificate replacement requests are done online using the Agency's Central Data Exchange (CDX) system. Acceptable methods for payments online include credit card, debit card, or electronic check.

#### 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 the amendment online using EPA's CDX system.

# Frequent question database (FQ database)

As you know, EPA maintains a list online of <u>Frequent</u> <u>Questions</u> 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. How many paint samples would a renovator need to take to determine if lead paint was present on a staircase? Did you guess five? Take a look at FQ 23002-33377 for more details!

#### **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.

An individual that completes a renovator course accredited by an authorized state is also qualified to work in EPA administered states for a period of 5 years following course completion, 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. <u>Click here</u> to see the FQ's related to this topic.