



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

JUN 18 2010

OFFICE OF
ENFORCEMENT AND
COMPLIANCE ASSURANCE

MEMORANDUM

FROM: Cynthia Giles *Cynthia Giles*
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Office of Enforcement and Compliance Assurance

TO: OPPTS and Enforcement Division Directors
Regions 1 – 10

SUBJECT: Further Implementation Guidance for the Renovation, Repair and Painting Rule

The purpose of this memorandum is to provide supplemental guidance to the Regions on enforcement of the Renovation, Repair and Painting Rule (RRP Rule) and the Amendment to the Opt-out and Recordkeeping Provisions in the Renovation, Repair, and Painting Program. Since the RRP Rule became effective on April 22, 2010, concerns have been raised by the regulated community regarding difficulties experienced in obtaining the rule required firm certification and renovation worker training.

Acknowledging those concerns and to facilitate the transition to full implementation of the RRP Rule, EPA will offer additional and sufficient time for renovation firms and workers to obtain the necessary training and certifications to comply as follows:

- Until October 1, 2010, EPA will not take enforcement action for violations of the RRP Rule's firm certification requirement.
- For violations of the RRP Rule's renovation worker certification requirement, EPA will not enforce against individual renovation workers if the person has applied to enroll in, or has enrolled in, by not later than September 30, 2010, a certified renovator class to train contractors in practices necessary for compliance with the final rules. Renovators must complete the training by December 31, 2010.

In view of the paramount importance of ensuring that all contractors follow the lead-safe work practices in the RRP rule, EPA will continue to enforce the work practice requirements in the rule which protect children and reduce lead exposure. Information

concerning lead-safe work practices can be found at
<http://www.epa.gov/lead/pubs/renovation.htm#requirements>.

EPA issued the Lead RRP rule because a disturbing number of America's children are still poisoned by lead-based paint in their homes-leading to learning and behavioral disorders. EPA considers the certification and training requirements important to ensure that firms are protecting children and other residents while renovations are on-going. Information about training is easily accessible on EPA's web site at <http://www.epa.gov/lead/pubs/training.htm>. To date, these training providers have offered more than 15,000 classes and trained 300,000 people. The Agency believes, however, that allowing additional time for firms and individuals to obtain that training and certification will facilitate compliance with the rule. The Agency appreciates the many unique challenges around the country, including numerous disaster declarations, and is committed to encouraging additional training opportunities in every state in order to meet the demand for classes.

Thank you for your continued focus on implementation of this important rule.

cc: Adam Kushner
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