




UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

APR 20 2010

MEMORANDUM

FROM: Steve Owens 
Assistant Administrator
Office of Prevention, Pesticides and Toxic Substances

Cynthia Giles 
Assistant Administrator
Office of Enforcement and Compliance Assurance

TO: OPPTS and Enforcement Division Directors
Regions 1 – 10

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

The Renovation, Repair and Painting Rule (RRP Rule), finalized in April 2008 under the Residential Lead-Based Paint Hazard Reduction Act of 1992, requires that contractors performing renovation, repair and painting projects that disturb lead-based paint in homes, child care facilities, and schools built before 1978 be certified and must follow specific work practices to prevent lead contamination. This rule will be fully effective on Thursday, April 22, 2010. The RRP rule is an important part of the Federal government's overall strategy for eliminating childhood lead poisoning. EPA issued the Lead RRP rule because a disturbing number of America's children are still being poisoned by lead-based paint in their homes-leading to learning and behavioral disorders. The rule provides simple, low cost, common-sense steps contractors can take during their work to protect children and families.

EPA has conducted extensive outreach and compliance assistance efforts for the RRP Rule for almost two years. This includes contacting over 250 property management firms and more than 6,500 trade associations, trade publications, union organizations, property management association, paint and hardware stores, local building and construction permitting organizations, general news publications and other interested parties to inform them of the requirements of the RRP Rule. EPA has worked with a large marketing firm to produce a multi-media public service announcement (PSA) print advertising campaign to reach even more of the regulated community to inform them about the renovation requirements and the training opportunities. EPA has reached out to contractors by distributing materials targeted to them through trade associations and large

construction materials retailers. EPA will continue to present and exhibit information at numerous major trade conferences, reaching tens of thousands of attendees. In addition, on April 20, EPA joined with the Coalition to End Childhood Lead Poisoning, the U.S. Department of Housing and Urban Development and the Ad Council, to sponsor a comprehensive public service campaign to raise awareness of the dangers of lead poisoning to children. The ads will be available in both English and Spanish.

EPA has been meeting regularly with stakeholders to share information on training and outreach. EPA is also launching an outreach campaign using print and radio PSAs targeted to homeowners. This campaign will highlight the importance of hiring lead-safe certified firms. EPA's outreach efforts to industry and homeowners are paying-off as indicated by the numbers of individuals trained and seeking training and firms certified and applying for certification, as the implementation date approaches.

EPA is doing everything we can to make the implementation of these rules as straightforward as possible. We have received some questions about the status of firms that applied for the required certification from EPA before the effective date (April 22, 2010) but have not yet received their certification from EPA. EPA does not intend to take enforcement actions against firms who applied for firm certification before April 22 and are just waiting for their paperwork. The certification requirement is important to making sure that firms are protecting children and other residents while renovations are ongoing, but EPA does not wish to disrupt ongoing renovations for those firms that submitted applications on time. We expect that all of the applications filed before April 22 will be reviewed by June, so it will only be a short window of time when firms that applied before April 22 are waiting to hear back from EPA. We will of course still enforce the rules about work practices and training requirements to make sure that the rules protecting the health of people are observed, and firms that comply with the rules are not put at a competitive disadvantage.

If Regions receive calls concerning grants or contracts with the Department of Energy on weatherization projects, the callers should be directed to call the Department of Energy with their questions about compliance with their grants or contracts.

cc: Adam Kushner
Lisa Lund
Wendy Cleland-Hamnett
Maria Doa
Leslye Fraser
Brenda Mallory