



High Risk of EPA Penalties

The EPA announced changes to the Renovation Repair and Painting Rule's firm and individual certification requirements last month. This is the regulation that governs all aspects of any construction activity that disturbs lead paint or coatings in residences, apartments, schools and childcare facilities. There is a huge misconception that EPA is not enforcing the RRP requirements. Some are assuming that EPA will not take enforcement action for violations of the RRP rule until October 1, 2010. **NOTHING COULD BE FURTHER FROM THE TRUTH.**

The announcement stated that EPA won't enforce against individual renovation workers **only** if that person has applied to enroll in, or has enrolled in, the initial RRP training by September 30, 2010, a certified renovator class. This memo does **NOT** delay the enforcement of the rule's work practice requirements. In general this applies to most building trades including window and door replacement, HVAC, painting, plumbing and roofing activities.

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