

Prepare Now to Meet EPA's Training and Certification Requirements for Lead-Based Paint Work

The U.S. Environmental Protection Agency's (EPA) new "Renovation, Repair, and Painting" program requires contractors who work in pre-1978 housing and child-occupied facilities to be certified and to follow specific lead-safe work practices by April 2010. The agency recently announced that it has begun to review and accredit training providers to conduct the courses that contractors covered by the lead rules are required to complete. Such contractors should start planning now in order to meet the upcoming compliance dates; EPA expects training opportunities to begin in summer 2009.

Approximately one year ago, EPA published a new rule to address lead-based paint hazards created by certain renovation, repair and painting activities (see [*AGC's Environmental Observer*](#), April-May 2008). Specifically, contractors performing work that disturbs lead-based paint in homes, child care facilities (residential, public or commercial buildings) and schools built before 1978 must be properly trained and certified (i.e., certain contractors will need to complete an EPA-accredited training course) and follow specific lead-safe work practices to prevent lead contamination. Providers of renovation and dust sampling technician training must be accredited.

Until that time, EPA recommends that anyone performing renovation, repair and painting projects that disturb lead-based paint in pre-1978 homes, child care facilities and schools follow lead-safe work practices. For example, all contractors should contain the work area, minimize dust and clean up thoroughly.

Current Requirements & Next Steps

Currently, contractors who perform renovation, repairs and painting jobs in pre-1978 housing and child-occupied facilities must, before beginning work, provide owners, tenants and child-care facilities with a copy of EPA's lead hazard information pamphlet [*Renovate Right: Important Lead Hazard Information for Families, Child Care Providers, and Schools \(PDF\)*](#) | [*En Español \(PDF\)*](#). Contractors must document compliance with this requirement. EPA's [pre-renovation disclosure form \(PDF\)](#) may be used for this purpose.

According to EPA, contractors who perform renovation, repairs and painting jobs should also:

- Take [training](#) to learn how to perform lead-safe work practices.

- Provide a copy of your EPA or state lead training certificate to your client.

- Tell your client what lead-safe methods you will use to perform the job.

- Learn the lead laws that apply to you regarding certification and lead-safe work practices beginning in April 2010.

- Ask your client to share the results of any previously conducted lead tests.

- Provide your client with references from at least three recent jobs involving homes built before 1978.

- Keep records to demonstrate that you and your workers have been trained in lead-safe work practices and that you followed lead-safe work practices on the job. To make recordkeeping easier, you may use the [sample recordkeeping checklist \(PDF\)](#) that EPA has developed to help contractors comply with the renovation recordkeeping requirements that will take effect in April 2010.

- Read about how to comply with EPA's rule in the [*EPA Small Entity Compliance Guide to Renovate Right \(PDF\)*](#) | [*en Español \(PDF\)*](#).

- Read about how to use lead-safe work practices in EPA's [*Steps to Lead Safe Renovation, Repair and Painting \(PDF\)*](#).