

EPA Announces Enforcement Delay on Some Provisions in the Lead Rule

Without any notice, the US EPA announced new guidelines on the implementation of the Renovation, Repair, and Painting (RRP) Rule, (aka the Lead Rule) that went into effect on April 22, 2010. The Lead Rule was implemented as part of a long standing government effort to prevent lead poisoning in children.

By now contractors should be aware that starting April 22, 2010, work that disturbs more than 6 square feet of painted surface area per room in a home or building built before 1978 where children may be present must be completed by a firm that is accredited by the EPA and whose workers are trained and certified in lead safe work practices.

In a memo released by the EPA Office of Enforcement and Compliance Assurance, EPA Regional offices are directed to delay enforcement on two of the provisions of the Lead Rule. However, contracting firms must still comply with many of the Lead Rule's requirements, including the use of lead-safe work place practices.

What the Enforcement Delay Means for Contractors:

- 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 certificate 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 31, 2010, a certified renovator class to train contractors in practices necessary for compliance with the final rules. Renovators must complete the final training by December 31, 2010.
- EPA will continue to enforce the work practice requirements of the RRP Rule.

For more detailed information about the work practice requirements, see EPA's RRP website or EPA's brochure on [Steps to Renovation, Repair, and Painting](#).

For more complete information about the Lead Rule and how it applies to renovating contractors, go to RRP [website](#).