

Newsletter for RRP Contractors

July 28, 2016

The content of this newsletter is for EPA administered jurisdictions only. This includes all but 14 states that operate their own RRP program. See "Authorized State" topic below for information.

Application process going green

Effective immediately, all lead program applications must be submitted electronically rather than by mail. This applies to all <u>individual</u>, <u>firm</u> and <u>trainer</u> applications required by EPA's lead renovation and abatement programs. All applications, payments, updates and certificate replacement requests are done online using the Agency's Central Data Exchange (CDX) system. Acceptable methods for payments online include credit card, debit card, or electronic check. Once submitted to EPA your application will be processed in 2 to 3 weeks. Upon completion, you will receive an email from lead.paint@epa.gov that includes your approval letter, certificate, and customized logo.

Firm re-certification

Firms that disturb painted surfaces in homes and child care facilities built before 1978 are subject to EPA's renovation regulation and likely require firm certification. These firm certifications expire every five years. Firms must apply for recertification to extend their certification an additional 5 years. Firms are encouraged to apply early, at least 90 days before their expiration, to ensure their application is processed before they expire. You won't be penalized for applying early, just be sure to select "re-certification" and your new 5-year certification won't begin until your current certification expires. <u>Click here</u> for information about applying for re-certification.

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National Lead Information Center

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Make sure you see important emails from EPA

Much of the correspondence sent by EPA (including final approval packages) are delivered by E-mail from lead.paint@epa.gov. To help ensure the timely receipt of Email correspondence, we recommend you add the lead.paint@epa.gov email address to your contacts to ensure it arrives in your inbox rather than a SPAM folder.

Check the status of your firm application with EPA's E-Enterprise site

EPA's E-Enterprise site allows you to check the status of your firm certification application, download a copy of a recently issued certificate or retrieve your customized lead program logo. To access the site, you should go to EPA's E-Enterprise portal, login in with your CDX user name and password, then go to the "progress tracker" section. From the "progress tracker" section you'll be able to see the status of your application and, if complete, download your certificate and customized program logo. The certificate and logo are available through the site for 6 months following issuance, after that you'll need to submit a certificate replacement request online.

Renovator refresher training

A renovator must take the 4-hour refresher course before the expiration of their current training, or they'll need to retake the 8-hour initial course to be certified again. Renovators must submit a copy of their current training course completion to the trainer to be eligible to take the refresher course.

Renovator refresher training can be done with or without a hands-on component. The version without hands-on training can be done entirely online! Review your options below, and when ready, use our <u>trainer search tool</u> to find trainers offering the option you're interested in.

| | Lecture | Hands-on | Course test | Certification period |
|-------------------------|-----------|-----------|----------------|----------------------|
| With hands- | In person | In person | In person | 5 years |
| on training | Online | In person | In person | 5 years |
| No hands-on training | Online | N/A | Online | 3 years*** |

***If you choose to recertify via an online course that does not include hands-on training (3 year certification), you must select an option with hands-on training (5 year certification) for your next recertification. The 3 year recertification option (i.e., no hands-on training) cannot be selected for back-to-back trainings.

Renovator training expiration extended

EPA <u>extended the training expiration date</u> for individual certified renovators that took the training before April 1, 2011. To determine when a renovator's training expires <u>refer</u> to this table. Expiration dates are based on when the previous course was taken. Renovators must take the refresher training before their training expiration in order to have valid certification.

EPA will not be issuing new course completion certificates or other documentation to renovators saying their expiration was extended. If an employer or customer has questions about the extension the renovator can print out <u>this guidance</u> and show it to them, or have them call the National Lead Information Center at 800-424-5323.

Note: The extensions do not apply to firm certifications.

Training course completion certificate

The training course completion certificate a renovator receives upon successful completion of an accredited renovator class serves as their individual certification. This document is very important because it's needed to qualify for the refresher training, and a renovator must have a copy onsite at every renovation project they are assigned. A copy of the original is all that's needed for these requirements, so remind your renovators to take several copies and keep the original in a secure place. If they can't locate a copy of their certificate, they'll need to contact the trainer they took the course from and request a copy.

EPA eliminates jurisdictions and their \$35 fee

EPA's February 17, 2016 final rule eliminated the requirement to apply for certification separately for each jurisdiction in EPA's LBP Activities program (i.e., inspection, risk assessment and abatement) and therefore dropped the \$35 fee per jurisdiction paid by firms, individuals and trainers that provided these services in more than one EPA administered jurisdiction. Now that this requirement has been removed, firms, individuals and training providers will receive one certificate that will allow them to work in all EPA-administered areas instead of one certificate per jurisdiction. Certificates issued before the final rule are still valid until their expiration and won't need to be replaced because of this rule. In addition, a previous certification in a single EPA-administered jurisdiction now allows firms, individuals and training providers to provide services in all EPA-administered areas until the expiration of that certification.

Authorized states

To date, EPA has authorized 14 states to run their own renovation programs. Renovators and firms that only work within an authorized state(s) must be certified by each authorized state in which they do work, and would not be required to be certified by EPA. The authorized states are AL, DE, GA, IA, KS, MA, MS, NC, OK, OR, RI, UT, WA and WI.

If an individual renovator is certified by an authorized state they are also qualified to work in EPA administered states, with no additional training. EPA certified renovators wishing to work in an authorized state should contact the state to determine if additional training/certification is necessary. Regardless of whether a firm is certified by an authorized state, if they do work in an EPA administered state they must be certified by EPA. <u>Click here</u> to see the FQ's related to this topic.

Frequent question database (FQ database)

EPA maintains a list online of <u>Frequent Questions</u> regarding the Agency's Lead Program. It is regularly updated to ensure that you have access to the very latest information. When questions come up we recommend you first review the Frequent Questions, then if you cannot find the answer you're looking for call the National Lead Information Center at 1-800-424-LEAD (5323).

Here's an example from the FQ database. Can the required records and documentation be stored electronically rather than as paper copies? The answer is "yes, the records can be stored electronically". Take a look at FQ 23002-32220 for more details!