

Dear Accredited EPA Lead Training Provider:

We are pleased that you have become a part of our nationwide network of accredited training providers helping to prevent childhood lead poisoning. This letter will update you on new aspects of our program. Please read this carefully as it pertains to your training requirements and opportunities.

Website

We have already included your company on our website list of accredited RRP trainers (<http://epa.gov/lead/pubs/trainingproviders.htm>). We hope that this will assist potential students in locating or arranging accessible courses. In the near future, we hope to replace this list with a search tool that will allow renovators to search for trainers in their area.

Training course updates

EPA will update model training course materials, as needed, with technical and/or editorial revisions to ensure the manuals remain up to date and accurate. When changes are necessary, the applicable files will be replaced, and a summary of the changes will be provided. The summary will be located in a section labeled "Summary of Updates/Corrections," on the affected training course webpage. Links to the training course webpages can be found at <http://www.epa.gov/lead/pubs/training.htm>. You should check our website regularly to see if any changes were made to the courses you are accredited to provide. When significant changes occur, EPA will provide an email notice informing you of changes, and directing you to the website for updated materials.

Availability of EPA post course exam

EPA developed course completion exams are **NOW AVAILABLE** for the 4-hour and 8-hour Renovator courses. Exams for the 8-hour Dust Sampling Technician course will be available soon. The exams were developed and statistically validated to ensure their fairness and accuracy. You have the option to either use the exam developed by EPA, or one that you develop. If you are interested in using the EPA exam, training managers should contact the National Lead Information Center at 1-800-424-LEAD after November 1st to get a copy. There are multiple versions of each exam, once you've signed up to use the EPA exam a new exam will be sent to you about every three months.

Renovation firm certification begins

Today, we will begin reviewing certification applications from renovation firms, and we plan to begin issuing certifications next week. Updated applications are on our website (<http://epa.gov/lead/pubs/firmapp.pdf>), and you should feel free to distribute these in your courses or via mailings.

State of Wisconsin is now authorized

Earlier this week, the state of Wisconsin became the first state in the nation to administer and enforce their own Lead Renovation, Repair and Painting (RRP) program. The Wisconsin program will operate in lieu of EPA's program in that state, allowing for greater local oversight. EPA's authorization of Wisconsin's program is based on a certification from Governor James E. Doyle that the Wisconsin program is at least as protective as the EPA RRP program and provides adequate enforcement. For more information about Wisconsin's new program, including information on applying for certification or finding training, contact the Wisconsin Lead Program at 608-261-6876, or visit the state web site: dhs.wisconsin.gov/lead.

This step has special significance for you, as an EPA-accredited trainer. To offer training in Wisconsin, you must check with the Wisconsin lead program to see how to obtain Wisconsin accreditation. You must also check with Wisconsin before offering EPA training in Wisconsin for renovators or dust sampling technicians intending to work in other states.

Current regulatory changes

On July 14, 2009, EPA finalized minor revisions to the Lead RRP rule. The revisions, which take effect immediately, require you, as an accredited renovation trainer, to submit post-course notifications, including digital photographs of each successful trainee, to EPA. These requirements, designed to supply important information for EPA's compliance monitoring efforts, were discussed in the final RRP rule issued on April 22, 2008, but were inadvertently left out of the regulatory text. The revisions are available on our website, at <http://epa.gov/lead/pubs/rrp.htm>.

We will use the post-training notifications in compiling a list of certified renovators. Aside from your legal responsibility to submit these notices in a timely manner, your trainees may not be on our list of renovators (to be available on-line soon) unless we receive your notices.

Future regulatory changes

EPA has agreed, via a recent settlement agreement, to propose several revisions to the RRP rule, and to begin two rulemakings covering public and commercial buildings.

Earlier this week, our Administrator signed a proposal to modify certain aspects of the RRP rule. These changes include:

- removing the "opt out" provision allow which currently allows home owners to opt out of the rule if they occupy the housing to be renovated, no child under 6 or pregnant woman lives there, and no child under 6 is present on a regular basis); and
- requiring renovation firms to provide owners and occupants with a copy of the recordkeeping checklist that firms are required to prepare and keep to demonstrate compliance with the RRP rule.

In addition, EPA is requesting comment on whether the 16-hour lead training requirement for principle instructors should be lowered to 8 hours, and whether the expiration date for renovator certification should be extended to July 1, 2015, for anyone who takes the renovator training before April 22, 2010. This would give renovators incentive to take the training early instead of waiting until the last minute which could cause training courses to fill up near the April 22, 2010,

deadline. EPA will take final action on all of these changes by April 22, 2010. Until that time, the current rule remains in effect.

We have also agreed to undertake other regulatory actions. These include:

- Proposing requirements for quantitative dust wipe testing and achievement of clearance standards after selected activities
- Proposing requirements for renovations on the exterior of public and commercial buildings, and considering requirements for interiors of public and commercial buildings

These potential future changes do not affect the current rule, which remains in effect. You need not take action at this time.

Consolidated schedule

The National Center for Healthy Housing has offered to post a calendar of RRP training courses that are available across the country. Although the search features are still being improved, you can view this calendar at <http://www.nchh.org/Training/Calendar.aspx>. At some point in the future, we hope to link to this calendar from our site. As a first step, if you are interested, you may contact the Chris Bloom at the National Center for Healthy Housing (cbloom@nchh.org) to make arrangements for including your training course scheduling information. Chris may also contact you directly. There will be no charge to you for posting this information.

If you have any further questions about the Renovation, Repair and Painting rule, you can visit EPA's Web site at www.epa.gov/lead, call the National Lead Information Center (NLIC) at 1(800) 424-LEAD [5323], or contact your EPA Regional contact.

Sincerely,

Michelle Price, Chief
Lead, Heavy Metals and Inorganics Branch