

RRP Rule Implementation

Conference Call 8/25/2010

1. EPA Updates
 - a. Number of firms and individuals Training & certification
 - i. 53,000 Firms
 - ii. 20,000 courses offered
 - iii. 449,000 people certified
 - iv. 313 Training providers
 1. 270 applications pending.
 - b. Regulatory Action at the state level
 - i. 9 states
 - c. Pre-renovation test kits
 - i. 2 currently recognized (35% false positive), third is coming
 - ii. New kits meeting negative response criteria are not approved yet.
 - iii. Current kits will be recognized until new kits are approved.
2. Implementation of training
 - a. Status of training courses/feedback
 - i. A lot of variability from training program to training program
 1. Told to follow different procedures
 2. Contact EPA with specifics and they will address
 3. Contractors can go to the FAQs on web site.
 - a. 71 pages of commonly asked questions
 - i. Searchable by keywords
 - b. PDF version of entire document is available
 - c. Updated monthly
 4. Contractors can look at the model training course to see what EPA says
 - b. Approved status for trainers seeking EPA Approval
 - c. Status of online training
3. Outreach
 - a. EPA outreach efforts, to contractors and consumers
 - i. Ad council site & ads aimed at lead poisoning, not specifically RRP
 - ii. Leadfreekids.org
 1. searchable database to find a certified renovator near you
 - iii. EPA web site has consumer outreach materials
 - b. Industry outreach efforts
 - c. NCHH outreach efforts
4. Feedback from contractors
 - a. Conflicts with OSHA
 - i. Updating the model course and will make sure it doesn't violate OSHA requirements
 - ii. Complaints have been very vague, they need to be specific
 - iii. OSHA has reviewed the RRP program
 - b. Volunteering & the RRP
 - i. Do houses that are being rehabbed (Habitat for Humanity) must have a certified renovator onsite.
 1. Is anyone being compensated
 2. Answered in the FAQ, refer people to that
5. Enforcement
 - a. June 18 memo from Cynthia Giles
 - i. Firms by September 30 and registered for course by December 31st
 - ii. April 20 memo –Firms that submitted application and waiting is OK

- iii. June 18 memo –Individual that has enrolled by September 30th and take the class by December 31st will not be enforced
- iv. ERPP document was released last week->How EPA intends to identify and calculate penalties.
 - 1. ERPP will be on web site later this week or contact Michael Bellot at EPA
- b. Enforcement actions by EPA
 - i. Tips & Hotlines
 - 1. Trying to follow-up but they are often vague.
 - 2. Bid packages that do not include RRP
 - a. Not a violation yet. Not until they do the job.
 - 3. Everyone has been waiting for the ERPP, now they will start to process.
 - c. Enforcement actions taken by states that have taken over the regulation
 - i. EPA has not heard anything yet.
 - d. Enforcement take by local building officials
 - i. Mostly in small jurisdictions
 - 1. Withholding permit processing
 - ii. Studies going on to see about coordinating permitting process.
 - iii. Minnesota amended their state building code to require RRP
 - iv. RRP may be included in the IRC
 - v. EPA must be the enforcement agency right now.
 - 1. Home rule may give locals the ability to enforce
 - a. No one seemed to know for sure.
 - e. Citizen's suits
 - i. None at this time
 - f. Clearance testing final rule due by July 2011