

## **RRP Rule : Responsibilities of a Certified Firm/Renovator**

(This checklist has been adapted from pages 4/5 of the *Small Entity Compliance Guide to Renovate Right EPA's Lead-based Paint Renovation, Repair, and Painting Program* booklet.)

**Note:** A **certified** firm is one that has applied to the EPA for certification to perform renovations or dust samplings. A **certified renovator** is an individual who has successfully completed an 8-hour initial renovator training course, that was offered by an EPA accredited program or an authorized state or tribal program.

Firms that are **certified are required** to:

- Ensure that all individuals who disturb painted surfaces on behalf of the firm are either certified or have been trained by a certified renovator.
- Have a certified renovator be assigned to each renovation and perform all of the certified renovator responsibilities.
- Ensure that all renovations performed by a firm are in accordance with the work practice standards outlined in the RRP. For more information on these standards please see page 9 of the *Small Entity Compliance Guide to Renovate Right EPA's Lead-based Paint Renovation, Repair, and Painting Program* booklet.
- Pre-renovation education requirements of the RRP (as outlined in the attached summary of the *Small Entity Compliance Guide to Renovate Right EPA's Lead-based Paint Renovation, Repair, and Painting Program* booklet), are performed.
- Programs recordkeeping requirements are met.

Renovators who are **certified are required** to:

- Use a test kit that has been approved by the EPA to determine if components of the affected area contains lead-based paint (when requested by the party contracting for renovation services).
- Provide on-the-job training for workers on the work practices that they will be using in carrying out their assigned tasks.
- Be physically present at the work site when warning signs are posted, while the work-area containment is being established, and while the work-area cleaning is performed.
- Regularly direct work that is being conducted by other individuals to ensure that work practices are being followed. This includes maintaining the integrity of the containment barriers and ensuring that dust or debris does not spread beyond the work area.
- Be available either on-site or by telephone during the duration of the renovation.
- Perform cleaning verification.
- Have a copies of their initial course completion certificate and their most recent refresher course completion certificate available.
- Prepare required records.

For specific questions relating to the RRP rule and pre-education requirements please contact Region 5 of the EPA at 1-800-621-8431.

