



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION III  
1650 Arch Street  
Philadelphia, Pennsylvania 19103-2029**

September 11, 2020

Dear Permitting Official,

On April 22, 2008, the U.S. Environmental Protection Agency (EPA) published a final regulation, the Lead-Based Paint Renovation, Repair and Painting (RRP) Rule, aimed at protecting the public from lead-based paint hazards associated with renovation, repair and painting activities. These activities create hazardous lead dust when surfaces with lead paint, even from many decades ago, are disturbed, and can specifically be harmful to **children under the age of 6 years** and pregnant women.

Federal law requires that contractors performing renovation, repair and painting projects that disturb painted surfaces in homes, childcare facilities and pre-schools built before 1978, to have their firm certified by EPA (or an EPA authorized state), use certified renovators who are trained by EPA-approved training providers and follow lead-safe work practices to prevent lead contamination.

EPA has certified more than 189,000 renovation firms that are qualified to conduct lead-safe renovations. EPA has accredited more than 1,000 RRP training providers, who have trained more than 710,000 individuals in lead-safe work practices. Despite these successes, EPA is concerned that there is a lack of public awareness of the benefits and requirements of the regulation. Many homeowners are still unaware of the dangers of lead contaminated dust that renovations can generate. Many contractors continue to operate out of compliance with the regulation, and could be subject to enforcement actions.

EPA is addressing this issue by reaching out to local building permitting officials to educate them about the rule and seek their assistance in increasing compliance with the regulation. EPA is requesting permitting officials to require proof of RRP firm certification as a condition of issuing a permit for renovations of homes built before 1978. This simple requirement for renovators seeking permits to conduct renovations in pre-1978 housing benefits both consumers and contractors. Contractors benefit by our providing a fair and level playing field for contractors who are complying with the law by being certified. Homeowners and their families benefit by the reduction of lead-contaminated dust generated during renovations.

It is important to note that EPA is not requesting that building codes be updated to include the lead-safe work practices from the EPA RRP regulation, nor is EPA asking code officials to enforce or interpret the EPA RRP regulations. EPA is solely responsible for providing detailed guidance to contractors who are seeking training, certification or clarifications on when and how the RRP rule is applicable.

One way to easily alert contractors to this requirement is to provide an additional box to check on an application for a permit to renovate, repair or paint a pre-1978 residence, childcare facility or preschool, which requests verification of a contractor's certified status before issuing a permit.

Please let us know whether you are interested in working with us on this matter by emailing Kyle Chelius at [Chelius.kyle@epa.gov](mailto:Chelius.kyle@epa.gov). Feel free to call our Lead Hotline at 1 (800) 424- LEAD [5323] or visit the National Lead Information Center at <https://www.epa.gov/lead/forms/lead-hotline-national-lead-information-center> with your comments and questions. Visit [www.epa.gov/lead](http://www.epa.gov/lead) for more information. Thank you for your consideration.