

## What Workers Need to Know About Vermont's Renovation, Repair, Painting and Maintenance (RRPM) Regulations

This document supplements the federal Renovation, Repair and Painting (RRP) Renovator training to provide information on how the Vermont Renovation, Repair, Painting and Maintenance (RRPM) regulations differ from the federal regulations. You must know these differences if you hold a Vermont RRPM license or Uncompensated Child Care Operator (UCCO) certificate. Prior to receiving these credentials, you must pass a test that confirms your knowledge of this information.

### Threshold Requirements for RRPM Work

The Vermont RRPM requirements apply if renovation, repair and painting activities exceed certain thresholds. Vermont's RRPM thresholds differ from the federal RRP thresholds in these ways:

#### Pre-1978 Housing (non-rental housing) and Child-Occupied Facilities

- Vermont's threshold for RRPM requirements apply when:
  - **1 square foot or more per interior room** of painted surfaces will be disturbed. This is lower than the EPA's threshold of 6 square feet per room.
  - **20 square feet or more per exterior surface**, which is the same as EPA's threshold.
- Window replacement or demolition of painted surface areas are considered RRPM activities, no matter how small the job.

#### Pre-1978 Rental Housing and Child Care Facilities

Vermont has additional requirements for pre-1978 rental housing and child care facilities, including lower thresholds for requiring RRPM:

- The RRPM requirements apply if the amount of paint being disturbed is:
  - 1 square foot per interior room
  - 1 square foot of exterior painted surface
- Inspection, Repair and Cleaning (IRC) Practices (formerly known as Essential Maintenance Practices) must be performed. These practices include periodic cleaning, identifying and ensuring repairs are performed by appropriately licensed or certified individuals, paint inspection, distribution of information and educational materials, and electronically filing an annual compliance statement.
- If the inspection identifies **1 square foot or more** of chipping and peeling paint, it must be repaired by an RRPM licensed or UCCO certified worker. Individuals with an EMP or IRC certificate can no longer perform repair work on 1 square foot or more of deteriorated painted or stained surfaces.

## Prohibited Work Practices

In the Vermont Regulations for Lead Control, certain RRPM work practices are prohibited, no matter how small the job. Other work practices need written pre-authorization for permission from the Vermont Department of Health's Asbestos and Lead Regulatory Program each time these practices are used, and the equipment must be equipped with proper filtration. See the table below for details on whether the work practice is allowed.

Work Practice	Vermont RRPM Regulations
Open flame burning or torching	Not allowed
Heat guns operated at or above 1100 °F	Not allowed
Dry scraping or sanding	Not allowed
Powersanders or similar mechanical tools	Need permission from the Department of Health and the equipment must be equipped with proper filtration
Hydro-blasting or high-pressure washing	Not allowed
Abrasive blasting or sandblasting	Not allowed
Chemical stripping	Not allowed

## Vermont RRPM Certification and Licensure

State law requires that firms and workers who perform renovation, repair and painting work in Vermont be Vermont RRPM licensed and/or certified.

- Each contracting firm, including sole proprietors, or a landlord conducting RRPM work on their own property, must have a **Lead-Safe RRPM Firm License**.
- Each RRPM worksite must have either a **Lead-Safe RRPM Supervisor** on site supervising the RRPM activities, or a **certified UCCO** conducting the RRPM activities.
- Child care operators who have an UCCO certificate may perform RRPM work on their child care facility **only**. No Lead-Safe RRPM Firm license is required with this certification. Certified UCCOs **cannot** perform RRPM work for hire, or train or supervise other workers.

## Information Distribution Requirements

The RRPM firm is required to provide homeowners and tenants with the following educational materials within 60 days of starting the work.

If performing RRPM work in a child-occupied facility, the RRPM firm or certified UCCO must provide these educational materials to the building owner, child care adult representative (if the child care operator is not the owner), parents and guardians of children using the child-

occupied facility. They must also provide the general nature and locations of the RRPM activities and anticipated completion date.

1. [EPA's Lead-Safe Certified Guide to Renovate Right](#)
2. [What Homeowners, Renters and Child Care Providers Need to Know About Vermont's Renovation, Repair, Painting and Maintenance \(RRPM\) Regulations](#)

## **RRPM Work Practices**

### **RRPM Supervision**

A Vermont licensed Lead-Safe RRPM Supervisor must always be physically present at the work area when RRPM activities are occurring and when the required RRPM signs are posted.

### **Workplace Warning Signs**

Vermont requires that the warning signs posted at RRPM worksites read: "Danger: Lead Work Area; May damage fertility or the unborn child; Causes damage to the central nervous system; Do not eat, drink or smoke in this area."

### **Testing for Presence of Lead-based Paint and Stains**

Under Vermont law, it is assumed that lead-based paint is present in all housing and child-occupied facilities built before 1978.

### **Vermont does not allow the use of hardware store lead test kits to verify if lead is present.**

The only way to verify if a building built before 1978 or a component within that building is lead-free is:

- A Vermont-licensed Lead Inspector or Risk Assessor must follow the U.S. Housing and Urban Development (HUD) protocols and either use an XRF machine or collect paint chip samples.
- The samples must be sent to a Vermont-licensed analytical testing laboratory, which will issue a report.
- The report must be provided to the Vermont Department of Health to review and determine if the building or component is lead-free.

If dust clearance testing is done after RRPM activities, it must be conducted by a Vermont-licensed Lead Inspector or Lead Inspector-Risk Assessor.

### **Weather**

Vermont limits RRPM activity due to weather. RRPM activities must not be conducted if wind speeds are greater than 20 miles per hour or if it is raining. Work must stop and the work area be cleaned up before rain or wind begins.

## Emergency Situations

In an emergency renovation situation, Vermont requires that all the RRPM requirements be met except for the information distribution, warning signs, and work area containment requirements.

## Recordkeeping and Reporting Requirements

Those performing RRPM activities in Vermont must keep all records necessary to demonstrate compliance with RRPM activities for a period of **six years** following completion of the RRPM activities. Federal RRP regulations require records to be kept for three years following the completion of RRP work.

## Worker Protection

All RRPM firms must follow the Vermont Occupational Safety and Health Administration (VOSHA) worker protection requirements to reduce lead exposure on RRPM worksites. The Vermont Regulations for Lead Control extend these requirements to sole proprietors.

These requirements are in effect in all RRPM work areas:

- No one may consume food or beverages, use tobacco products, or apply cosmetics within a lead work area.
- All workers in an RRPM work area must have appropriately maintained personal protective equipment and protective clothing, including footwear, to prevent direct contact with lead contamination.
  - Workers must wear clothing that covers their entire bodies and remove it in the designated changing area when leaving the jobsite.
  - Footwear needs to be exchanged or covered with disposable impervious shoe covers in the designated changing area prior to the workers entering the RRPM work area. Footwear or shoe covers must be exchanged or removed each time the worker leaves the RRPM work area to avoid spreading lead to other parts of the jobsite and beyond.
  - To protect against airborne lead particles, the Occupational Safety and Health Administration (OSHA) respirator and airborne exposure testing requirements are required in RRPM work areas.
- All RRPM areas must be equipped, at a minimum, with the following hygiene facilities:
  - Change area(s): Individuals must put on or remove protective clothing, footwear, and respirators (as applicable) in a change area that is located in the designated clean zone prior to entering or leaving the lead work area.
  - Hand washing station(s): Individuals must wash hands and face with soap upon exiting the RRPM work area.
- Project WorkSAFE: [labor.vermont.gov/workplace-safety/project-worksafe](https://labor.vermont.gov/workplace-safety/project-worksafe)
- OSHA Lead Resource Site: [www.osha.gov/lead](https://www.osha.gov/lead)
- Vermont OSHA (VOSHA): [labor.vermont.gov/vosha](https://labor.vermont.gov/vosha)

## Questions?

For questions or more information, contact:

Asbestos and Lead Regulatory Program

**Phone:** 802-863-7220 or 800-439-8550 (toll-free in Vermont)

**Email:** [AHS.VDHALRPgeneral@vermont.gov](mailto:AHS.VDHALRPgeneral@vermont.gov)

Learn more about Vermont RRPM and how to apply for the RRPM credentials at [www.healthvermont.gov/rrpm](http://www.healthvermont.gov/rrpm).