# RRPM Checklist – Pre-Renovation Information and Recordkeeping February 2025

Use this checklist to make sure you have all the paperwork necessary for your RRPM project. Refer to the **Target Housing Checklist** for worksite requirements. For full the RRPM requirements, see the <u>Vermont Regulations for Lead Control</u>.

If you need help accessing or understanding this information, contact <u>ALRP@vermont.gov.</u>

## **Pre-Renovation Information Distribution Requirements**

Before starting RRPM work on a building, you must give the property owner and residents educational materials about lead poisoning hazards and information about the planned RRPM activities.

## **RRPM Activities in Residential Buildings**

Within 60 days before RRPM work begins, you must:

- □ Give the owner of the building the <u>Renovate Right pamphlet</u> and the <u>Vermont RRPM</u> <u>Regulations fact sheet</u>. If it is a rental property, you must also give the pamphlet and fact sheet to the tenants. You can deliver them in person or mail them.
- □ Keep a record of proof that the owner/tenant has received the pamphlet and fact sheet by choosing **one** of the following:
  - □ Written or electronic acknowledgement from the owner/tenant of the building that they have received the pamphlet and fact sheet. You can use <u>this sample</u> <u>form</u>, or write your own that includes:
    - The owner's/tenant's name
    - A statement that the owner/tenant received the pamphlet and fact sheet
    - The address of the unit
    - The signature of the owner/tenant
    - The date of signature
  - □ A self-certification of attempted delivery if you delivered the pamphlet and fact sheet and did not get a signature from the owner/tenant.
  - □ A certificate of mailing from the post office that is dated at least seven days before the RRPM work begins.







## **RRPM Activities in Common Areas**

Within 60 days before RRPM work begins, you must:

- Give the owner of the building a <u>Renovate Right pamphlet</u> and the <u>Vermont RRPM</u> <u>Regulations fact sheet</u>.
- You must have an acknowledgement from the owner certifying that they have received these materials or get a certificate of mailing by following the instructions in the previous section.
- □ To notify the residents, you must do **one** of the following:
  - Notify each affected resident in writing and make the <u>Renovate Right pamphlet</u> and the <u>Vermont RRPM Regulations fact sheet</u> available upon request before RRPM work begins. You can use <u>this notification form</u>, or write your own that includes:
    - The location(s) and nature of the work being done.
    - Expected start date and end date.
    - How residents can get the pamphlet, fact sheet, and other records associated with the work (for example, licenses, on-the-job training, tenant notification).
- Post informational signs describing the nature and location(s) of RRPM work and expected end date. Be sure that the signs are:
  - In a place where they are likely to be seen by affected residents.
  - Accompanied by a posted copy of the pamphlet and fact sheet or information on how to get a copy of the pamphlet and fact sheet and other records associated with the work.
- Prepare, sign and date a statement describing the steps you took to notify all residents of the planned RRPM work and to provide the pamphlet and fact sheet. Keep the statement for your records.
- □ If the scope, location(s) or expected start or end dates of the planned RRPM activities change after you notify residents, you must provide another written notification before the work starts.

#### Recordkeeping

You must keep records of RRPM activities for six years after the work has been completed. Be prepared to share these records with the Vermont Department of Health, if requested. You can use this <u>RRPM Worksite Checklist.</u>



## **Pre-Renovation Information Distribution Records**

You must keep records of proof that you notified property owners or residents before each RRPM project began. These records must include **one** of the following:

- □ Signed and dated written or electronic acknowledgements from owner(s) and tenant(s) that they received informational materials before the work began
- □ Certifications of attempted delivery
- □ Certificates of mailing from the post office

## **Records of Lead-Safe Work Practices**

You must keep records that show your firm used lead-safe work practices, including documents that show that:

- A licensed Lead-Safe RRPM Supervisor was assigned to the project, and copies of their licenses and training certificates. If the project was performed by a UCCO or RRPM Firm Landlord, copies of their certificate or license.
- The assigned supervisor provided training for all on-the-job and unlicensed workers doing RRPM work on the project including training on (UCCOs and RRPM Firm – Landlords cannot perform on-the-job training):
  - Posting warning signs
  - Setting up plastic containment barriers
  - Maintaining containment
  - Working wet and avoiding the spread of dust to adjacent areas
  - Waste handling
  - Post-renovation cleaning
- The UCCO, RRPM Firm Landlord or assigned supervisor did all of the work themselves, or that a licensed Lead-Safe RRPM Supervisor directed on-the-job workers who used all required work practices.
- □ There was post-renovation cleaning verification. You will need to describe the results and the number of wet and dry cloths used.
  - Disposal of lead waste following Vermont's <u>Solid Waste Management Rules</u> or <u>Hazardous Waste Management Regulations</u>.

## **Records of Exemptions (if applicable)**



You must keep records of any component or property exemption, including:

- A report from a licensed lead-based paint inspector or inspector-risk assessor
- A letter of exemption from the Health Department



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