

DIFFERENCE BETWEEN VT LP LAW AND EPA RRP LAW

Vermont Lead Paint Law	Shaded items are more restrictive	EPA Renovation, Repair & Painting Rule
<ul style="list-style-type: none"> * Pre-1978 rental housing and child care facilities must complete EMP's * LSWP required in pre-1978 owner occupied 	Applicability	Pre-1978 housing and child occupied facilities, <i>including schools, etc.</i>
LSWP required if more than 1 SF of paint to be disturbed, either interior or exterior	Threshold/ Trigger	LSWP required if more than 6 SF disturbed interior; 20 SF disturbed exterior
EMP certification only (no cost)	License	Renovation Firms licensed by EPA (\$300)
<ul style="list-style-type: none"> * 4-hour EMP Training - one time (generally free) * 1 trained supervisor per job site 	Training	<ul style="list-style-type: none"> * 8-hour EPA initial training * 4-hour EPA refresher every 5 yrs. * 1 trained supervisor per job site
Not required	Pre-Work Notification	<ul style="list-style-type: none"> * Provide owners/occupants with Renovate Right pamphlet, info about work to be completed. * Keep records of notification * Requirement in place since 1998
<ul style="list-style-type: none"> * Copies of EMP Compliance Statements provided to tenants when submitted to VDH * Protect Your Family pamphlet provided to tenants at lease-up and with compliance statements annually * State specific requirements for sale or transfer of pre-1978 residential prop. 	Disclosure	<ul style="list-style-type: none"> * Since 1996, owners required to disclose all records of LBP activities to potential buyers and/or tenants. * Standard form, pamphlet provided to buyers/tenants. * Keep all records of disclosure activities.
<ul style="list-style-type: none"> * Visual inspections for paint deterioration * Prompt repairs using LSWP * Window well inserts * Poster to report problems * Specialized cleaning at turnover * Specialized cleaning after work * Removal of exterior paint chips 	Property Maintenance	Not required - LSWP by licensed renovator only when paint is disturbed or repaired over threshold amount.

<p>In addition to EPA prohibited practices:</p> <ul style="list-style-type: none"> * dry scraping / dry sanding * all machine sanding or grinding * uncontained power washing * strippers containing methylene chloride 	<p>Prohibited Practices</p>	<ul style="list-style-type: none"> * open flame burning/torching * power sanding or grinding without HEPA exhaust controls * heat guns over 1100 degrees
<ul style="list-style-type: none"> * Visual check after all cleaning * No visible dust and debris 	<p>Clearance</p>	<ul style="list-style-type: none"> * EPA cleaning verification procedure * 3rd party dust clearance & lab analysis in some situations
<ul style="list-style-type: none"> * Completed EMP Compliance Statements provided to residents when submitted 	<p>Post-Work Notification</p>	<ul style="list-style-type: none"> * Provide records of activities and cleaning verification to owner and occupants
<ul style="list-style-type: none"> * Compliance Statements * Records of providing Compliance Statements and pamphlets to tenants, others. * Records of inspections/work done 	<p>Recordkeeping</p>	<ul style="list-style-type: none"> * Renovation firms must maintain all records, sign-offs, etc. for 3 years after project completion. * Property owners must keep all records and disclose them to appropriate parties as noted above.

A SPECIAL THANKS FOR COMPILING THIS TABLE TO:

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SPECIAL LINKS TO ADDITIONAL INFORMATION:

<http://www.leadSAFEvermont.org/download/EMP%20Manual%202009%20Approved%20Master.pdf> EMP TRAINING MANUAL

<http://www.leadSAFEvermont.org/html/contractors.html> EMP TRAINING SCHEDULE

<http://www.leadSAFEvermont.org> LEAD SAFE VERMONT WEBSITE

<http://healthvermont.gov/enviro/lead/lead.aspx> VERMONT LEAD HOTLINE

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