

# 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"> <li>* Pre-1978 rental housing and child care facilities must complete EMP's</li> <li>* LSWP required in pre-1978 owner occupied</li> </ul>   | 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/<br>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"> <li>* 4-hour EMP Training - one time (generally free)</li> <li>* 1 trained supervisor per job site</li> </ul>  | Training                          | <ul style="list-style-type: none"> <li>* 8-hour EPA initial training</li> <li>* 4-hour EPA refresher every 5 yrs.</li> <li>* 1 trained supervisor per job site</li> </ul>  |
| Not required  | Pre-Work<br>Notification          | <ul style="list-style-type: none"> <li>* Provide owners/occupants with Renovate Right pamphlet, info about work to be completed.</li> <li>* Keep records of notification</li> <li>* Requirement in place since 1998</li> </ul>   |
| <ul style="list-style-type: none"> <li>* Copies of EMP Compliance Statements provided to tenants when submitted to VDH</li> <li>* Protect Your Family pamphlet provided to tenants at lease-up and with compliance statements annually</li> <li>* State specific requirements for sale or transfer of pre-1978 residential prop.</li> </ul> | Disclosure                        | <ul style="list-style-type: none"> <li>* Since 1996, owners required to disclose all records of LBP activities to potential buyers and/or tenants.</li> <li>* Standard form, pamphlet provided to buyers/tenants.</li> <li>* Keep all records of disclosure activities.</li> </ul> |
| <ul style="list-style-type: none"> <li>* Visual inspections for paint deterioration</li> <li>* Prompt repairs using LSWP</li> <li>* Window well inserts</li> <li>* Poster to report problems</li> <li>* Specialized cleaning at turnover</li> <li>* Specialized cleaning after work</li> <li>* Removal of exterior paint chips</li> </ul>   | Property<br>Maintenance           | Not required - LSWP by licensed renovator only when paint is disturbed or repaired over threshold amount.  |

|  |                             |   |
|--|-----------------------------|---|
| <b>In addition to EPA prohibited practices:</b><br>* dry scraping / dry sanding<br>* all machine sanding or grinding<br>* uncontained power washing<br>* strippers containing methylene chloride | Prohibited<br><br>Practices | * open flame burning/torching<br>* power sanding or grinding without HEPA exhaust controls<br>* heat guns over 1100 degrees   |
| * Visual check after all cleaning<br>* No visible dust and debris  | Clearance                   | * EPA cleaning verification procedure<br>* 3rd party dust clearance & lab analysis in some situations   |
| * Completed EMP Compliance Statements provided to residents when submitted   | Post-Work<br>Notification   | * Provide records of activities and cleaning verification to owner and occupants  |
| * Compliance Statements<br>* Records of providing Compliance Statements and pamphlets to tenants, others.<br>* Records of inspections/work done  | Recordkeeping               | * Renovation firms must maintain all records, sign-offs, etc. for 3 years after project completion.<br>* Property owners must keep all records and disclose them to appropriate parties as noted above. |

***A SPECIAL THANKS FOR COMPILING THIS TABLE TO:***

**BOB ZATZKE  
THE VERMONT HOUSING AND CONSERVATION BOARD  
LEAD-BASED PAINT HAZARD REDUCTION PROGRAM  
58 EAST STATE STREET, MONTPELIER, VT 05602  
(802) 828-0170 <http://www.vhcb.org>**

***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

**(800) 439-8550 or (802) 652-0358**

LeadSMART Training Solutions  
21 Main Street  
South Berwick, ME 03908  
(800) 289-8073  
[www.leadsmartraining.com](http://www.leadsmartraining.com)