

What Homeowners, Renters and Child Care Providers Need to Know About Vermont's Renovation, Repair, Painting and Maintenance (RRPM) Regulations

Vermont requires that contractors provide this information sheet – along with the Environmental Protection Agency's [Lead-Safe Certified Guide to Renovate Right](#) – to homeowners, tenants, child care providers and parents/caregivers of children using the facility before any renovation, repair and painting work begins on their home or child care if it was built before 1978.

This information sheet describes Vermont's Renovation, Repair, Painting and Maintenance (RRPM) regulations. These regulations are in place to protect the public, especially children, from exposure to lead-based paint and to help prevent lead poisoning.

Vermont RRPM Certification and Licensure

Vermont requires that firms and workers who perform RRPM work in Vermont be licensed and/or certified. These are the RRPM license types:

- **Lead-Safe RRPM Firm License** – Each contracting firm or company, including a landlord conducting RRPM work on their own property, must have a Lead-Safe RRPM Firm License.
- **Lead-Safe RRPM Supervisor License** – Each worksite must have an individual with a Lead-Safe RRPM Supervisor who is present while the work is happening.
- **Uncompensated Child Care Operator (UCCO) Certification** – Child care providers who have an Uncompensated Child Care Operator Certification may perform RRPM work on their own child care facility only. No Lead-Safe RRPM Firm License is required with this certification. Certified Uncompensated Child Care Operators cannot perform RRPM work for hire or train or supervise other workers.

Before you hire an RRPM certified firm, confirm that they have current RRPM firm and supervisor licenses by check their licensing status with the Vermont Department of Health's Asbestos and Lead Regulatory Program. Also request to see the contractor's RRPM firm and supervisor licenses. Workers are required to have their licenses or certifications on them while they are performing RRPM work.

Work That Falls Under Vermont's RRPM Regulations

The Vermont RRPM requirements apply if renovation, repair, painting and maintenance work will disturb a certain surface area, and the requirements differ depending on the type of dwelling. (Please note that the surface areas in Vermont may be smaller than what federal regulations require.)

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

- Lead-Safe RRPM licenses are required when work is done on equal to or more than:
 - 1 square foot per interior room
 - 20 square feet of exterior painted surface
- Window replacement or demolition of painted surfaces are considered RRPM activities, no matter how small the job.
- Under Vermont law, some work practices are prohibited, no matter how small the job. Other work practices require a permit from the Asbestos and Lead Regulatory Program. The table below shows whether the work practice is not allowed or requires a permit.

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
Power sanders 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

Pre-1978 Rental Housing and Child Care Facilities

Vermont has additional requirements for pre-1978 rental housing and child care facilities licensed by the Vermont Department for Children and Families:

- Lead-Safe RRPM licenses or UCCO certification is required when work is done on equal to or more than:
 - 1 square foot per interior room
 - 1 square foot of exterior painted surface
- Chipping and peeling paint over 1 square foot on pre-1978 must be repaired.
- Inspection, Repair and Cleaning (IRC) Practices (formerly known as Essential Maintenance Practices) must be performed. These practices include periodic cleaning, identifying repairs to be performed by appropriately licensed or certified individuals, paint inspection, distribution of information and educational material, and electronically filing an annual compliance statement with the state. Learn more at www.healthvermont.gov/irc.

What is Required While the Work is Happening

RRPM Supervision

A licensed Lead-Safe RRPM Supervisor must always be physically present at the worksite when RRPM work is happening 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

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:

1. 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.
2. The samples must be sent to a Vermont-licensed analytical testing laboratory, which will issue a report.
3. 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. The RRPM firm must insure RRPM activities are not 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.

Questions?

For questions or more information, contact:

Vermont Department of Health
Asbestos and Lead Regulatory Program
Phone: 802-863-7220 or 800-439-8550 (toll-free in Vermont)
Email: AHS.VDHALRPgeneral@vermont.gov
Website: www.healthvermont.gov/rrpm