

# What Contractors Need to Know About Vermont Lead-Safe RRPM

Disturbing lead-based paint and coatings without proper precautions can put you and others at risk of lead exposure. Exposure to this toxic substance can cause lead poisoning.

Protect your customers, your workers and yourself by using lead-safe work practices. Under Vermont law, you must have the Lead-Safe Renovation, Repair, Maintenance and Painting (RRPM) Firm and Supervisor licenses if you work on housing or child occupied facilities built before 1978.

If you need help accessing or understanding this information, contact [ALRP@vermont.gov](mailto:ALRP@vermont.gov).

## Assume Paint is Lead-Based

Under Vermont law, all paint, stains and other coatings in pre-1978 buildings are considered lead-based unless they are tested by a Vermont-licensed lead inspector and the property has been granted an exemption by the Asbestos and Lead Regulatory Program. Vermont does not accept results from hardware store lead test kits to verify if lead is absent.

- If you are working in a building constructed before 1978, you are required by law to assume all paints and coatings are lead-based.
- The only way to prove paint is not lead-based is to have a Vermont licensed inspector or risk assessor test the property with an X-Ray Fluorescence (XRF) analyzer and submit the report to the Health Department and receive a written exemption.
- Vermont does not recognize the use of swab test kits for paint testing.

## Renovation, Repair, Painting and Maintenance (RRPM)

RRPM activities disturb paint on pre-1978 housing or child-occupied facilities. Disturbing a painted surface means engaging in activities that create dust and/or debris. Examples include renovation, remodeling, repair, maintenance, plumbing, carpentry, electrical work, window installation, painting preparation or weatherization.

### What type of work falls under the RRPM regulations?

The RRPM regulations require workers to follow certain lead-safe work practices to minimize the amount and spread of lead paint chips and dust, which can cause lead poisoning.

The regulations apply to all pre-1978 housing (rented or owner-occupied) and child-occupied facilities. Anyone that does work that may disturb painted surfaces in pre-1978 housing including contractors, property owners and landlords, must have an RRPM license.



**HealthVermont.gov/RRPM**  
**802-863-7220**



RRPM requirements apply in the following situations:

- The project will disturb one square foot or more of an interior painted surface per room, or 20 square feet per exterior surface on pre-1978 housing or child-occupied facilities (such as kindergartens or preschools).
- The project will disturb one square foot or more of an interior painted surface per room, or one square foot or more per exterior surface on pre-1978 residential rental housing and child care facilities (such as daycares).

## What are the training requirements?

Training is required before you can apply for the Lead-Safe RRPM licenses. There are two initial training courses to take that are good for five years. To maintain your Lead-Safe RRPM license – and before your previous RRP training certificate expires – you will need to take two refresher training courses every five years. Find out more about the RRPM training requirements at [www.HealthVermont.gov/RRPM#training](http://www.HealthVermont.gov/RRPM#training).

## What are the licensing requirements?

- **Lead-Safe RRPM Supervisor license** – This license is for an individual who supervises the work onsite and needs to be renewed every year. An RRPM supervisor must work for an RRPM firm.
- **Lead-Safe RRPM Firm license** – This license is for the company and needs to be renewed every five years. An RRPM Firm must have at least one licensed RRPM supervisor. The supervisor must remain on the jobsite the entire time RRPM work is underway.
- **RRPM Firm – Landlord license** – This certification is for landlords to perform work on their own rental housing only and needs to be renewed every five years.

The RRPM Firm – Landlord license cannot supervise other workers. They must perform all RRPM work themselves.

## What lead-safe RRPM work practices look like

Workers must follow these **lead-safe work practices**:

- Use plastic sheets to contain the work areas by:
- Cover the floors and any furniture that cannot be moved, and securing the plastic cover with tape.
  - Seal off doors and heating and cooling system vents.

- For exterior work, cover the ground 10 feet out from the work area. In some cases, there may need to be extra precautions to contain the work area (for example, putting up vertical containment).
- Put up warning signs that alert others to potential lead hazards.
- Clean up and close off the work area daily.
- Clean up all work before taking down the plastic sheets when work is complete.
- Exterior work areas must be properly cleared of visible paint chips and debris. Interior work areas must be deep cleaned by using a HEPA vacuum on all surfaces and then wet wiping and wet mopping with detergent and rinse water.
- When the final cleaning is done, there should be no dust, paint chips or debris in the work area.
- The supervisor must follow a cleaning verification procedure to make sure cleaning was done properly. If the work area has been adequately cleaned, a clean wet disposable cloth (like a Swiffer) should not pick up any signs of dirt when run along the walls, windowsills or floors of the work area.

## **Never use prohibited work practices**

These work practices are prohibited on all pre-1978 buildings and other structures:

- Open flame burning or torching
- Use of heat guns operating at or above 1,100 degrees Fahrenheit
- Dry scraping or dry sanding
- Use of powered tools
- Hydro-blasting or high-pressure washing
- Abrasive blasting or sandblasting
- Chemical stripping