



EPA Lead Based Paint Rule Change - Property Mgmt. Co. and Employee Certification

The Environmental Protection Agency (EPA) issued a significant advisory regarding Lead Based Paint restoration, repair and painting activities (RRP) that changes certification requirements for property management companies (PMC) and their employees. This often-overlooked advisory, dated April 18, 2022, has a direct impact on PMCs and their employees.

Key Takeaways from the EPA Advisory:

- **Scope of the Directive:** The EPA clarifies the obligations of PMCs involved in RRP activities, extending the definition of these responsibilities to include not only the execution of such projects but also the preparatory stages—namely, obtaining bids, hiring, scheduling, inspecting and approving work done by third-party vendors.
- **Certification Requirements:** Any PMC and individual employees engaged in RRP activities must be certified. This requirement is consistent with Federal law that expressly states that all PMC employees conducting lead-based paint activities must obtain certification.
- **Affected Entities:** The advisory targets PMCs that manage, propose, or undertake renovations in properties built before 1978.
- **Compliance Steps:** To comply with the RRP Rule, PMCs must secure RRP certification from the EPA for both their employees and any external renovation contractors they employ.

How PMCs Can Achieve Compliance:

You can visit the EPA's dedicated page for RRP certification at:

<https://www.epa.gov/lead/getcertified> to start the application process. This site provides information on the certification requirements, application procedures, and resources for PMCs to ensure compliance.

Implications for PMCs:

This advisory marks a significant shift in how PMCs must approach RRP projects in older buildings. The emphasis on individual certification underscores the EPA's stringent approach to mitigating lead exposure risks. PMCs are now tasked with a proactive role in ensuring that their employees and the contractors they hire are equipped with the necessary knowledge and certification to safely manage lead-based paint activities.

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