

Vermont's Essential Maintenance Practices (EMP) law and the new federal EPA Renovation, Repair, and Painting (RRP) rule both require the use of Lead Safe Work Practices (LSWP) when surfaces are disturbed or repaired that may contain lead-based paint. The RRP rule takes effect in April of 2010. The chart below compares the two regulations and shows important differences.

Vermont Lead Paint Law	Shaded more protective	EPA Renovation, Repair & Painting Rule
* 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, including schools, etc.
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)
* 4-hour EMP Training - one time (generally free) * 1 trained supervisor per job site	Training	* 8-hour EPA initial training * 4-hour EPA refresher every 3 yrs. * 1 trained supervisor per job site
Not required	Pre-Work Notification	* Provide owners/occupants with Renovate Right pamphlet, info about work to be completed. * Keep records of notification * Requirement in place since 1996
* 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	* 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.
* 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.
* Visual check after all cleaning * No visible dust and debris	Clearance	* EPA cleaning verification procedure * 3rd party dust clearance & lab analysis in some situations
* Completed EMP Compliance Statements provided to residents when submitted	Post-Work Notification	* Provide records of activities and cleaning verification to owner and occupants
* Compliance Statements * Records of providing Compliance Statements and pamphlets to tenants, others. * Records of inspections/work done	Recordkeeping	* 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.