



## **ELECTRONIC SUBMISSION**

February 13, 2015

Document Control Office (7407M)  
Office of Pollution Prevention and Toxics  
U.S. Environmental Protection Agency  
1200 Pennsylvania Ave., N.W.  
Washington, DC 20460-0001

Attention Docket ID No. EPA-HQ-OPPT-2014-0304

### **RE: Comments on EPA's Proposed Rule: Lead-Based Paint Programs; Amendment to Jurisdiction-Specific Certification and Accreditation Requirements and Renovator Refresher Training Requirements**

Dear Sir or Madam:

On Jan. 14, the U.S. Environmental Protection Agency (EPA) proposed revisions<sup>1</sup> to the current Lead Renovation, Repair and Painting (RRP) rule<sup>2</sup> that would eliminate the requirement that the renovator refresher training have a hands-on component and extend the recertification deadline for a portion of renovators, so they can take advantage of this change. The proposal would also eliminate the need to pay accreditation and certification fees in the multiple states where EPA administers the program for Lead-based Paint (LBP) Activities<sup>3</sup> (abatement, inspection and risk assessment). In addition, EPA proposes to clarify certain responsibilities for training providers under both the RRP and LBP Activities programs.

AGC supports EPA's proposed actions. By removing the requirement for hands-on refresher renovator training and the multi-jurisdiction fees, EPA estimates the proposed rule would save industry up to \$9.6 million per year using a 3 percent discount rate and \$9.8 million per year using a 7 percent discount rate. AGC urges EPA to move forward as quickly as possible to finalize this rule so that the tens of thousands of renovators whose certifications are set to expire

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AGC of America to the U.S. Environmental Protection Agency

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by July 1, 2015,<sup>4</sup>



separate certifications/accreditations in each EPA-administered state under the Lead RRP rule, which has posed no problems.

#### IV. Conclusion

EPA's proposal is a positive step that will provide AGC members and other small businesses with more options to complete the required Lead RRP refresher training course and retain their EPA certifications. Likewise, it will remove unnecessarily costly and duplicative accreditation and certification fees that apply to training professionals, individual renovators and construction firms that provide training or perform lead-based paint activities in more than one state where EPA administers the LBP Activities program.

Thank you for the opportunity to comment on this proposal and for taking the time to consider AGC's comments and recommendations. If you have any questions or require further information, please contact me, Leah Pilconis, at [pilconisl@agc.org](mailto:pilconisl@agc.org) or (703) 837-5332.

Sincerely,

  


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