

Vermont RRPM Regulations for Workers

November 2025

This document explains **what workers need to know about Vermont Renovation, Repair, Painting and Maintenance (RRPM) regulations**. It supplements the federal Renovation, Repair and Painting (RRP) Lead Renovator training to explain the differences between Vermont RRPM regulations and federal regulations.

You must know these differences if you hold a Vermont RRPM license or Uncompensated Child Care Operator (UCCO) certificate. You must pass a test that confirms your knowledge of this information before you receive your license.

If you need help accessing or understanding this information, contact ALRP@vermont.gov.

Threshold Requirements for RRPM Work

The Vermont RRPM requirements apply if renovation, repair and painting activities exceed certain thresholds. Vermont's RRPM thresholds differ from the federal RRP thresholds in these ways:

Pre-1978 housing (non-rental housing) and child-occupied facilities

Vermont's threshold for RRPM requirements apply when:

- **1 square foot or more per interior room** of painted surfaces will be disturbed (which is lower than the Environmental Protection Agency's (EPA's) threshold of 6 square feet per room)
- **20 square feet or more per exterior side of building** (which is the same as EPA's threshold)

Window replacement or demolition of painted surface areas are considered RRPM activities, no matter how small the job is.

Pre-1978 rental housing and child care facilities

The RRPM requirements apply if the amount of paint being disturbed is:

- **1 square foot or more per interior room**
- **1 square foot or more per exterior side of building** (which is lower than EPA's threshold)

Prohibited Work Practices

Under Vermont law, certain work practices are prohibited on all pre-1978 buildings. Use this table to see which ones are prohibited.

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	You need a Lead-Safe RRPM Power Tool Permit from the Health Department for each job. The power tool must be equipped with proper HEPA dust filtration attachment.
Hydro-blasting or high-pressure washing	Not allowed
Abrasive blasting or sandblasting	Not allowed
Chemical stripping	Not allowed

Lead-Safe RRPM Power Tool Permit

If you have a Vermont Lead-Safe RRPM license or UCCO certificate, you can get a permit to use powered mechanical tools with a HEPA vacuum dust control attachment for specific work areas. The permit application will ask you for the location of the RRPM worksite and information about the power tool and dust control attachment.

Apply for a power tool permit in the portal at TinyURL.com/ALRP-portal.

Vermont Licensure and UCCO Certification

State law requires that firms and workers who do renovation, repair and painting work in Vermont are Lead-Safe RRPM licensed or certified.

- Each contracting firm, including sole proprietors, must have a **Lead-Safe RRPM Firm License** and at least one licensed Lead-Safe RRPM Supervisor.
- Each RRPM worksite must have either a licensed **Lead-Safe RRPM Supervisor** or **Lead-Safe RRPM Firm-Landlord** or **certified UCCO** doing the RRPM work. The Lead-Safe RRPM Supervisor can train other workers to perform RRPM work. However, the supervisor must remain on the jobsite to supervise the entire time the RRPM work is underway.

- Landlords who have a **Lead-Safe RRPM Firm - Landlord License** may perform RRPM work on their pre-1978 rental housing **only**.
 - No Lead-Safe RRPM Firm license is required with this certification.
 - Lead-Safe RRPM Firm - Landlords **cannot** perform RRPM work for hire, or train or supervise other workers.
- Child care operators who have a **UCCO Certificate** may perform RRPM work on their child care facility **only**.
 - No Lead-Safe RRPM Firm license is required with this certification.
 - Certified UCCOs **cannot** perform RRPM work for hire, or train or supervise other workers.
- Lead-Safe RRPM Firms, RRPM Supervisors, RRPM Firm - Landlords and UCCOs **must apply for their licenses or certificates** from the Health Department before beginning work.
 - The RRP Lead Renovator training certificate does not license or certify you to do RRPM work.
 - To apply for licenses or certificates, go to www.HealthVermont.gov/LeadLicense or scan the QR code on the last page of this document.

IRC Practices for Pre-1978 Rental Housing and Child Care Facilities

If you are a landlord or child care operator, you must complete Inspection, Repair and Cleaning (IRC) Practices on housing or child care facilities built before 1978. You must file an annual statement with the Health Department confirming that IRC Practices were performed.

If any deterioration above 1 square foot per interior room or exterior side of the building is found during an IRC Practices inspection, you must either:

- Hire a Lead-Safe RRPM Firm to do the repair work.
- Get a Lead-Safe RRPM Firm – Landlord license or UCCO certificate and do the work yourself, if it is on your own property.

Learn more about IRC Practices at www.HealthVermont.gov/IRC.

Information Distribution Requirements

The licensed RRPM firm or RRPM firm - landlord is required to give homeowners and tenants these educational materials within 60 days of starting work:

- [EPA's Lead-Safe Certified Guide to Renovate Right](#)
- [Vermont RRPM for Homeowners, Renters and Child Care Providers](#)

If RRPM work is done in a child-occupied facility, the RRPM firm or certified UCCO must give these educational materials to the building owner, child care adult representative (if the child care operator is not the owner) and parents and guardians of children using the child-occupied facility. You must also provide the general nature and locations of the RRPM activities and the anticipated completion date.

RRPM Work Practices

RRPM supervision

A Vermont licensed Lead-Safe RRPM Supervisor must always be physically present at the work area when RRPM activities are 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.

Find printable warning signs to use at www.HealthVermont.gov/RRPM#resources.

Weather

Vermont limits RRPM activity if wind speeds are greater than 20 miles per hour or if it is raining. You must stop RRPM work and clean up the work area before rain or wind begins.

Emergency situations

In an emergency renovation situation, Vermont requires that all the RRPM requirements be met except for the information distribution, warning signs, and work area containment requirements.

Testing for presence of lead-based paint and stains

Under Vermont law, it is assumed that lead-based paint is present in all housing and child-occupied facilities built before 1978.

Vermont does not allow hardware store lead test kits to verify if lead is absent. The only way to verify whether a building or part of a building is lead-free is:

- Hire a Vermont-licensed Lead Inspector or Lead Inspector-Risk Assessor who will:
 - Perform an inspection using an XRF machine or collect paint chip samples following U.S. Housing and Urban Development (HUD) protocols.
 - Send any paint chip samples to a Vermont-licensed laboratory for analysis.
 - Submit a building or component exemption application to the Health Department.
- The Health Department will review the application, and if approved will issue a full building exemption or building component exemption from the lead regulations.
- You will get a letter from the Health Department stating that the building is fully or partially exempt from the lead regulations.
 - If the building is partially exempt, the letter will list the exempt building components.
 - **Keep the letter to show that your building is exempt from the lead regulations.**

If dust clearance testing is done after RRPM activities, it must be conducted by a Vermont-licensed Lead Inspector or Lead Inspector-Risk Assessor. Find a Lead Inspector or Lead Inspector-Risk Assessor at [TinyURL.com/RRPM-lookup](https://www.tinyurl.com/RRPM-lookup).

Worker protection

All RRPM firms must follow the Vermont Occupational Safety and Health Administration (VOSHA) worker protection requirements to reduce lead exposure on RRPM worksites. The Vermont Regulations for Lead Control extend these requirements to sole proprietors.

These requirements are in effect in all RRPM work areas:

- No one may consume food or beverages, use tobacco products, or apply cosmetics within a lead work area.
- All workers in an RRPM work area must wear personal protective equipment and clothing, including footwear, to prevent direct contact with lead contamination.
- Workers must wear clothing that covers their entire bodies and remove it in the designated changing area when leaving the jobsite.
 - Footwear needs to be exchanged or covered with disposable impervious shoe covers in the designated changing area before entering the RRPM work area.

- Footwear or shoe covers must be exchanged or removed each time the worker leaves the RRPM work area to keep lead from spreading to other parts of the jobsite and beyond.
- To protect against airborne lead particles, the Occupational Safety and Health Administration (OSHA) respirator and airborne exposure testing are required in RRPM work areas.
- All RRPM areas must be equipped, at a minimum, with the following hygiene facilities:
 - Change area(s): Individuals must put on or remove protective clothing, footwear, and respirators (as applicable) in a change area in the designated clean zone before entering or leaving the lead work area.
 - Hand washing station(s): Individuals must wash hands and face with soap upon leaving the RRPM work area.

Learn more about OSHA lead requirements:

- Project WorkSAFE: labor.vermont.gov/workplace-safety/project-worksafe
- OSHA Lead Resource Site: www.osha.gov/lead
- Vermont OSHA (VOSHA): labor.vermont.gov/vosha

Recordkeeping and reporting requirements

You must keep all records necessary to demonstrate compliance with RRPM activities for **six years** following the completion of RRPM work. This is longer than federal RRP regulations, which require records to be kept for three years following the completion of RRP work.

Find printable templates to help you with recordkeeping at www.HealthVermont.gov/RRPM#resources.

Questions?

For questions or more information, contact the Asbestos and Lead Regulatory Program:

- **Email:** ALRP@vermont.gov
- **Phone:** 802-863-7220 or 800-439-8550 (toll-free in Vermont)

Learn more about Vermont RRPM and find RRPM resources at www.HealthVermont.gov/RRPM.

Visit the ALRP Licensing and Permitting Portal by scanning the QR code with your phone or go to www.HealthVermont.gov/LeadLicense.

