

April 15, 2010

DASMA BULLETIN NO. 145-10 [E]

TO: All Members

SUBJECT: EPA: Lead Paint Rules Do Not Apply to Most Garage Door Work

EPA officials have confirmed that a large portion of garage door technician activity is not subject to the Lead Paint Rule, which becomes effective on April 22, 2010. The Rule applies to lead paint issues that may arise when working on pre-1978 homes, child care facilities, and schools.

However, the EPA says garage door dealers “need to have a trained and certified renovator on staff, and their firm needs to be a certified firm.” Failure to comply can incur a fine of “up to \$37,500 per violation, per day.” See the EPA Web site for [certification application forms](#).

DASMA recently sent several questions to Dr. Maria Doa, the director of the EPA Lead Paint Program. The EPA’s official responses came from Marc Edmonds, Environmental Protection Specialist in the National Program Chemicals Division of the U.S. Environmental Protection Agency.

Here are DASMA’s questions and the EPA’s key responses. [Text in brackets] represents clarifying language added by DASMA.

Servicing a Garage Door or Opener

- (1) **DASMA:** Does a garage door technician trigger the RRP (Lead Paint) Rule if the task involves removing or installing fasteners in a lead-painted surface? (The surface could be a door section, door trim, jamb, header, or ceiling.)

EPA: The RRP rule does not apply for work that meets the definition of minor repair and maintenance. Removing or installing fasteners may disturb paint but the RRP rule would only apply if the combined area of paint disturbed for the entire renovation exceeds the square footage in the definition of minor repair and maintenance [i.e., 6 square feet for interior space and 20 square feet for exterior space].

Replacing a Garage Door

- (2) **DASMA:** Does a garage door technician trigger the rule if the task involves removing a lead-painted garage door section?

EPA: If you are only removing fasteners and not disturbing paint on the doors then the square footage of the doors do not have to be counted toward the 6 square feet [interior] and 20 square feet [exterior] in the definition of minor repair and maintenance.

DASMA: Yes, we are only removing fasteners, and yes, we believe that we are not “disturbing paint on the doors.” However, we do carry the door sections away from the garage and load them into a truck. Are we correct in viewing this carrying process as not “disturbing paint on the doors”?

EPA: There may be some instances where removing a door could disturb the paint. For example, if the paint is in bad condition and paint chips fall off the door when it is taken off the hinges or carried, then that would be considered disturbing paint.

Removing Garage Door Trim

(3) **DASMA:** Does a garage door technician trigger the rule if the task involves removing lead-painted trim from the garage door exterior? (The exterior trim is usually pried off.)

EPA: The removal of painted trim would be considered disturbing paint and would have to be counted toward the square footage of the minor repair and maintenance definition [i.e., 6 sq. ft. for interior and 20 sq. ft. for exterior].

[Note: If the exterior trim is five inches wide and covers the two side jambs and the header of a 16' x 8' door, the total exterior square footage of the trim is 13.3 sq. ft., or not enough to trigger the rule.]

EPA: When removing painted components, or portions of painted components, the entire surface area removed is the amount of painted surface disturbed. Jobs, other than emergency renovations, performed in the same room within the same 30 days must be considered the same job for the purpose of determining whether the job is a minor repair and maintenance activity.

We believe the three scenarios above cover most garage door-related work affected by the Lead Paint Rule. DASMA and IDA are both working to provide complete coverage of issues related to the Lead Paint Rule. At next week's Expo, IDA will be providing some information on the show floor. The summer issue of Door & Access Systems will also have more details for you and your dealers.

If you have comments or questions, please let us know. Acting on behalf of the industry, DASMA can present follow-up questions to the EPA as needed.

Very truly yours,



JOHN H. ADDINGTON
Executive Director

JHA/lms
dasma

cc: Board of Directors