

Going to School on Lead Paint



In April, I spent a day taking the EPA's newly required RRP (Renovation, Repair, and Painting) class in lead-safe work practices. If you aren't aware of this rule and you work on pre-1978 houses, you need to get with the program. Now. By the time you read this, the new law will be in effect. There are only about 200 certified instructors nationwide, and it's not easy to get a seat in a class. The potential fines for non-compliance are business killers — up to \$32,500 per incident.

Gene, the instructor for my class, started off with a story. The day before the class, he woke to the sound of angle grinders stripping paint from his neighbor's house. He had tested that house before and knew it was covered with lead paint. The air over Gene's property was fogged with dust. Gene showed us the test swab he used on the dust covering his car, and it was bright red, indicating heavy lead contamination. The painters told Gene they were trying to get the job done before the new law kicked in. He convinced them to stop grinding, but only after mentioning that the state DEP might be interested.

Gene was concerned for the health of a young relative who visits his home regularly. Lead isn't good for anyone, but it has serious neurological effects on young children: Because their brains are still developing rapidly, lead exposure can lead to permanent loss of intelligence as well as long-term behavior issues. And if he ever wanted to sell his house and the buyer had the soil tested for lead, he might have a financial disaster on his hands.

Years back, painters might add 10 pounds of lead compounds to a gallon of paint to make the paint last longer. A Victorian house might have as much as 1,000 pounds of lead on its siding; any dust created by working on that siding will have lead in it.

Gene pointed out that even before the RRP rules, contractors would have been liable if they had contaminated that property with lead, and that the RRP work requirements aren't much more than most careful contractors would have employed anyway. We're talking plastic on the ground or floor and careful cleanup. Inside, you'll need a HEPA vacuum (\$500 or more) and a bunch of Swiffer cloths.

Which is not to say this law or its implementation are trouble-free. They aren't. The record keeping will be ugly. And you, as the certified remodeler, will spend considerable time training your employees and subs before they can legally work on a job with lead paint. And as much as I liked Gene, I could have learned everything he taught in that 8-hour, \$185 class by running through an online tutorial that might have taken an hour. That still leaves testing, but the test itself took about 10 minutes. And there's the \$300 fee each firm has to pay to the EPA. It's good for 5 years, but I'm not at all sure what they're doing for us with our money.

There's still a lot of uncertainty, too, about what the rule means. For example, with outside work, it kicks in when you disturb 20 square feet or more of a lead-contaminated surface. Gene told my class that 20 square feet refers to the "component" you're working on, not just the work area. So if you have to remove one clapboard to gain access to attach a ledger, the component is the 15 squares of siding on that wall, and the RRP rule applies — even if that clapboard is only 10 square feet. In *Question & Answer* (page 24), Shawn McCadden says different. But right now, the EPA is too busy to answer the phones for such questions. Much as we all need to get with the program, so does the EPA.

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