

# Letters

## Lead Regs: State vs. Federal

In the article “Lead-Safe Remodeling” (*JLC Report*, 1/11), you state: “In Illinois ... a positive test for lead means that any demolition must be performed by a lead-remediation firm, leaving the remodeler shut out of the job until that phase is complete. If no testing takes place, the demo work can be done by any EPA-certified renovator working in accordance with the RRP.”

I have passed the certified renovator course in Illinois and I believe that this is not an accurate statement. The EPA regional contact for lead for the state of Illinois confirmed that if a certified renovator — with the permission of the homeowner and using an approved test kit — gets a positive result, he or she can proceed with demo in accordance with RRP rules. Likewise, if the test is negative, demo can proceed without following the RRP rules.

**Rich Rosenwinkel**  
Glen Ellyn, Ill.

*Contributing editor Jon Vara responds: The discrepancy has to do with a key difference between state and federal requirements. The information provided to you by the regional EPA office is accurate from the standpoint of federal law. But according to Sam Churchill, Lead Program Manager for the Illinois Department of Public Health, the state does not recognize a contractor-type lead “swab test” as definitive, so whether the result is positive or negative is irrelevant from the state’s point of view. Illinois does, however, recognize more sophisticated lead tests performed by state-licensed lead risk assessors. The good news is that there’s no general requirement for such a test as part of a remodeling project. But if a lead assessment test is performed and yields a positive result, the requirement for remediation of the site by a licensed lead-abatement contractor does indeed come into play. Bottom line: Don’t test, follow the provisions of the RRP to the letter, and you satisfy both the state and federal requirements.*

## Down and Out Venting

Steve Kuhl’s article “Making a Business of Ice Dams” (1/11) was particularly interesting to me because I have dealt with

so many of them over the years both as a builder and now in my consulting work. He correctly identifies bath fans as the kind of roof penetration that can cause what he refers to as “mini ice dams.” Not only can venting bathroom or kitchen fans through a roof cause ice dams, but it can also drop condensation onto the ceiling and rust the fan. This is why, since the 1970s, I have recommended venting these fans through the rim joist. Another advantage of this method is that the laws of physics work in our favor: The stack effect helps seal the flap instead of allowing warm air out the vent, which is common when the termination is above the fan, either in the roof or a gable wall.

**Henri de Marne**  
Essex, Vt.

## Roof Ventilation Skeptic

Thank you for the great piece on ice dam remediation (1/11). All of the points are well-made — until we get to ventilation. Roof ventilation is an ineffective solution for ice dam formation. This can be inferred from the statement that an attic can hardly be overventilated: That’s true because it doesn’t work. Ventilation also worsens the heat loss that causes the ice dams in the first place. Because attic spaces are very difficult to adequately seal from conditioned space, are wasted volume, and can act as greenhouse collectors under the uninsulated deck, the best design in most cases is the unvented cathedral roof.

The next article in the same issue is about high-performance homes — homes with unvented, cold-region cathedral roofs. Those roofs will not ice, the heating loads will be very low, and the structures will last indefinitely. These results are not unrelated.

**Scott Flipse**  
State College, Pa.

*They are not unrelated, but there are some key contextual differences between the homes in the two articles: 5,700 average annual heating degree days on Martha’s Vineyard vs. 7,900 in Minneapolis; 22 inches average annual snowfall vs. 54 inches; and, most important, brand-new tight houses with simple shapes, lots of insulation, and carefully detailed air barriers vs. ordinary aging houses with all the usual problems. The article clearly emphasizes that air-sealing is the first order of business in dealing with ice dams. Ventilation should be added where it will help, by washing confined attic spaces with cold outdoor air. (Weather data from NOAA.) — The Editor*

### KEEP 'EM COMING!

Letters must be signed and include the writer’s address. *JLC* reserves the right to edit for grammar, length, and clarity. Mail to *JLC*, 186 Allen Brook Lane, Williston, VT 05495; or e-mail to [jlc-editorial@hanleywood.com](mailto:jlc-editorial@hanleywood.com).

