

Letters

Lead Paint Rules Require Context

I'm writing in response to William Wiehe's letter ("Interpreting the RRP," 4/12) about my earlier Q&A regarding whether the RRP rule applies to situations in which a homeowner does demo work before a remodeling contractor comes to the job ("When the Homeowner Does the Demo," 2/12). I certainly agree with Mr. Wiehe's first point — that if the rule doesn't apply to a job, then firm certification would not be required. However, for this to be the case, there must not be any disturbed painted or coated surfaces within the work area, or the site must have been pretested by a lead-testing professional to confirm the absence of lead-based paint.

Mr. Wiehe also mentions emergency work as an exception to the rule. While it's true that emergency work is excluded from the required work practices, cleaning and cleaning verification are still required after the emergency work has been completed. Therefore a certified firm must do this part of the project and keep documentation.

He also points out that some jobs requiring demolition may not involve painted surfaces — "for example, modification to a wood-paneled office ... or replacement of natural-finish kitchen cabinets." It's important to note that the rule applies to both painted *and* coated surfaces. So while "a wood-paneled office" and "natural-finish kitchen cabinets" are not painted, such surfaces do typically have some kind of coating on them. Since such coatings may contain lead, demolition of those materials would fall under the rule unless it has been established by testing that there is no lead present.

There seems to be a lot of confusion surrounding the EPA's definition of "demolition." For example, would carefully removing kitchen cabinets from a wall constitute demolition? Consider the following question posted at the EPA's FAQ site (epa.gov/lead/pubs/rrp-faq.pdf): "My firm replaces garage doors. We unbolt the door from its hardware and remove it without penetrating, scraping, or removing paint. Is this work subject to the RRP rule?" The answer is interesting: "If unbolting and

removing the door does not disturb a painted surface in the hinges, door, or frame, the RRP rule does not apply." Presumably you could apply the same logic to removing a cabinet; as long as it remains intact and the work does not disturb more than 6 square feet of painted surface on the surrounding walls, that work might not be considered "demo" or "renovation" and might not fall under the rule.

In summary I suggest that it would be helpful for all contractors doing RRP work to read and study the entire rule so as to make decisions within its full context.

Shawn McCadden
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Modular Skeptic

The author of your story "Energy-Efficient Modular" (3/12) seems to have hooked up with the right manufacturer and setting crew. I was brought in on a multifamily modular job a few years ago; each building had four units and three stories. The manufacturer had placed the marriage walls in the stairwells, and the accuracy was terrible. I was hired to do drywall infill, but some of the joints were as much as 1½ inches out of plane — try floating out that bump! Also, the setting crew must have been paid when a unit was set, not when it was roofed, so they placed the modules as fast as they could, tarping as they went. The tarps kept blowing off at night and we arrived day after day to new puddles, wet wall cavities, and general havoc. Ceilings and walls had to be opened up to stay ahead of the mold, and although a drying crew was brought in, their heaters seemed to make things worse. Pulling down drywall that has been glued and screwed is time-consuming — and doesn't do much for job morale, either. No matter how I tell this story, it was worse than I can describe.

Once the developer got behind schedule in paying the subs, I saw the writing on the wall and pulled my crew, taking a small loss in the process. Shortly after, the developer went bankrupt, and now the development is a large, decaying example of irrational exuberance.

Choose your team members right and modular can work smoothly. Get involved with the wrong group and you're lucky to get out with your skin.

Clint Howes
Revive Construction
Portland, Ore.

KEEP 'EM COMING!

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