

On May 6, 2010, the EPA proposed several significant changes to the Renovation, Repair and Painting Rule. **The EPA is requesting public comment on the proposed changes, and these comments must be received by the EPA on or before July 6, 2010.**

This is your opportunity to voice your concerns regarding the additional costs and complexities that the changes will bring to your renovation projects. By providing feedback to the EPA, you can help ensure that the viewpoint of the Renovation Community is taken into account as the EPA decides what changes to enact. Do not allow outside interests to direct your work practices.

There are two major areas that the proposed changes will affect:

1. The EPA is proposing to require Dust Wipe Testing after many renovations.
2. The EPA is proposing a Renovation, Repair, and Painting Program for Public and Commercial Buildings.

Under the first proposal, the EPA would require Dust Wipe Testing in a variety of circumstances, including:

- a. Use of a heat gun below 1100° F
- b. Removal or Replacement of Window or Door Frames
- c. Scraping of 60ft² or more of painted surface
- d. Removal of more than 40ft² of Trim, Molding, Cabinets or other Fixtures
- e. Use of Machines designed to remove paint through high speed operations
- f. The Demolition or Removal, through destructive means, of more than 6ft² of plaster and lath building components

Cleaning Verification would still be required. However, upon successful completion of the Verification Procedure, a Certified Lead Inspector, Certified Lead Risk Assessor, or a Dust Sampling Technician would have to complete a Dust Test Wiping.

Please see the Federal Register/Vol. 75, No 87/ Thursday, May 6, 2010/ Proposed Rules page 25038 for further information on this first proposal.

Under the second Proposal, the EPA is asking for comment on the Development of a Renovation, Repair, and Painting Rule to apply to:

- a. Exteriors of Public and Commercial buildings
- b. If lead-based paint hazards are determined to exist, Interiors of Public and Commercial buildings

Please see the Federal Register/Vol. 75, No 87/ Thursday, May 6, 2010/ Proposed Rules page 24848 for further information on this second proposal

Comments must be submitted by one of the following three ways:

1. Online at the Federal eRulemaking Portal:
<http://go.madmimi.com/redirects/3da0e22c495c74fd7030161da04482df?pa=1167245212>
2. Mail: Document Control Office (7407), Office of Pollution Prevention and Toxics (OPPT), Environmental Protection Agency, 1200 Pennsylvania Ave, NW, Washington DC 20460-0001
3. Hand Delivery: OPPT Document Control Office (DCO), EPA East Building, Rm 6428, 1201 Constitution Ave, NW, Washington, DC; Attention _____ (appropriate Docket Number)

Please ensure that you annotate the appropriate docket number for the proposals on which you are commenting:

- A. Dust Wipe Tests— EPA-HQ-OPPT-2005-0049
- B. RRP for Public and Commercial Buildings— EPA-HQ-OPPT-2010-0173

For your convenience, EPA's Renovate Right pamphlets may be obtained from Copies Plus...More at 860-537-0082.