

# EPA CONFIRMS LEAD PAINT RULE UPDATES DON'T APPLY TO MOST GARAGE DOOR WORK

By Chris Johnson, DASMA Executive Director



**E**arlier this year, DASMA contacted the Environmental Protection Agency (EPA) for clarification regarding updates to the EPA Lead Paint Rule adopted in 2010. The EPA's official responses came from Marc Edmonds, who served as the Environmental Protection Specialist in the National Program Chemicals Division of the U.S. Environmental Protection Agency at the time of the original inquiry.

In general, the guidance from EPA remains the same: A large portion of garage door

technician activity is not subject to the Lead Paint Rule, which took effect on April 22, 2010. The rule applies to issues relating to lead paint that may arise when working on pre-1978 homes, childcare facilities, and schools.

However, the EPA says garage door dealers "need to have a trained and certified renovator on staff, and these firms need to be certified." Failure to comply can incur a fine of "up to \$37,500 per violation, per day." See the EPA website ([www.epa.gov/lead/getcertified](http://www.epa.gov/lead/getcertified)) for more information.

## Q&A with the EPA

DASMA had questions about how the Rule applies when servicing a garage door or opener, when replacing a garage door, and when removing garage door trim.

Below are the questions presented by DASMA and the key responses provided by the EPA. Text in brackets represents clarifying language added by DASMA. The new material added in 2025 has been highlighted in a separate box.

## NEW CONTENT ADDED IN 2025

"An activity that disturbs less than 20 square feet of exterior painted surface and otherwise meets the definition of minor repair and maintenance is not subject to the RRP Rule. However, the RRP Rule provides that when removing painted components, or portions of painted components, the entire surface area removed is the amount of painted surface disturbed.

In this case, application of the RRP Rule is dependent on how much of the garage door your firm intends to remove and replace. If you disturb a painted surface on a single panel while removing and replacing the entire garage door (i.e., all the panels), you must aggregate the surface area of all the panels. Similarly, if you disturb a

painted surface on a single panel while removing and replacing more than one panel, you must aggregate the surface area of those panels being removed to determine whether or not the RRP Rule applies.

If, however, you disturb a painted surface on a single panel while removing and replacing only that panel, and the activity disturbs less than 20 sq. ft. of exterior painted surface and otherwise meets the definition of minor repair and maintenance (e.g., not demolition or using prohibited practices), such an activity would be considered minor repair and maintenance, and therefore would not be subject to the RRP Rule."

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### Servicing a garage door or opener

**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 [6 sq. ft. for interior space and 20 sq. ft. for exterior space].

### Replacing a garage door

**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 does not have to be counted

toward the 6 sq. ft. (interior) and 20 sq. ft. (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

**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 [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. – 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 or not the job is a minor repair and maintenance activity. ■



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