NATIONAL BUREAU OF STANDARDS REPORT

10 658

PROCEDURES FOR LEAD PAINT REMOVAL AND DETOXIFICATION: GUIDELINES AND ATTRIBUTES



U.S. DEPARTMENT OF COMMERCE NATIONAL BUREAU OF STANDARDS

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PROCEDURES FOR LEAD PAINT REMOVAL AND DETOXIFICATION: GUIDELINES AND ATTRIBUTES

by

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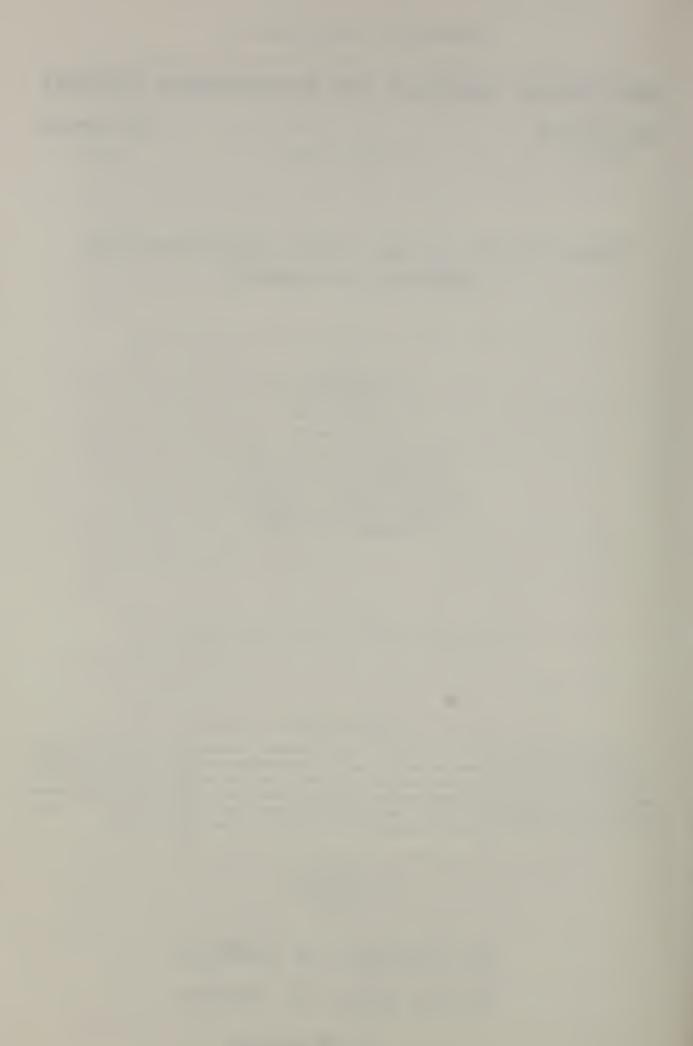
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ABSTRACT

Methods currently used to control the lead paint poisoning hazard in housing vary in effectiveness from complete elimination of the hazard to a barely minimal effort that presents a high potential for recurrence. A series of guidelines have been drawn up to acquaint municipal planners and other decision makers with the factors that should be considered in implementing a deleading program. Formats are presented to assist in the determination of the source of the hazard, the extent of the hazard, and to put forth those attributes of the various detoxification methods that should be considered when initiating a deleading program.

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PROCEDURES FOR LEAD PAINT REMOVAL AND DETOXIFICATION: GUIDELINES AND ATTRIBUTES

I. INTRODUCTION

As a result of increasing concern and a growing awareness, many cities that a few months ago claimed to have no lead poisoning problem are suddenly discovering that they indeed have very serious problems with this childhood affliction.

One solution to the lead paint poisoning problem is very simple; eliminate the sources of lead that children can come in contact with. This could be done very easily within the framework of existing technology, but with the cost of detoxifying a residence ranging from a few hundred dollars up to the thousands of dollars, and with several million dwelling units involved, the costs would be astronomical.

Very few cities are currently engaged in programs to detoxify housing that has been identified as the source of lead paint poisoning. In spite of the small number of programs presently in existence, the methods used vary in effectiveness from complete elimination of the hazard to a barely minimal effort that presents a high potential for recurrence of the problem.

A series of guidelines have been developed in order to acquaint municipal planners and other decision makers with the factors that should be considered when starting up a program to delead housing. It is expected that these guidelines will be of particular value to those cities that have had no experience in dealing with the problem. However, in view of the fact that the detoxification procedures used in some current municipal programs are of very limited effectiveness, they should be of

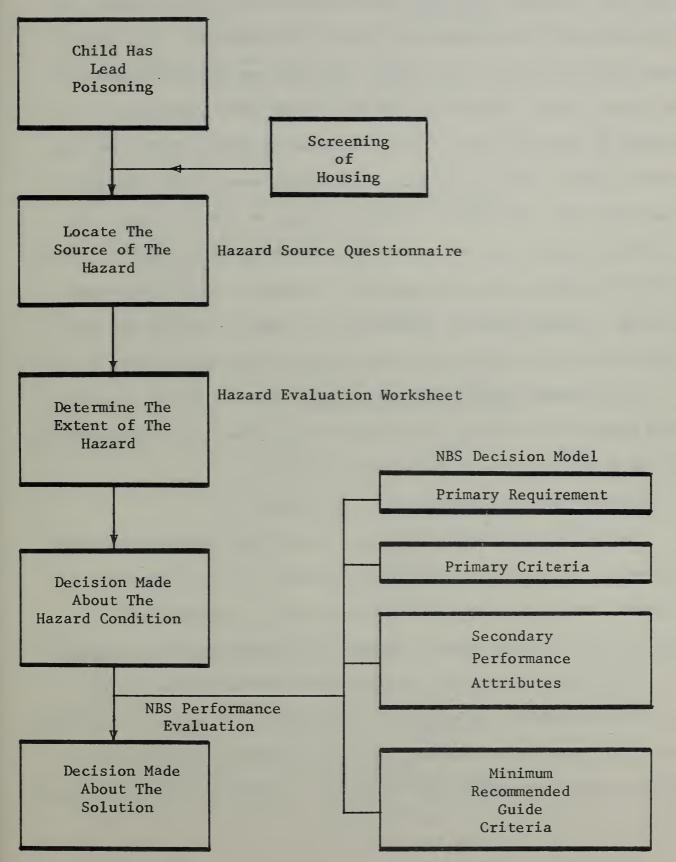
value to at least some of the cities presently concerned with lead poisoning control.

Methodologies are presented, in the form of questionaires and worksheets, to assist responsible authorities to determine the source of the hazard, to determine the extent of the hazard, and to consider the factors that should be evaluated in the process of choosing methods for detoxification. In addition to the primary requirement of elimination of the lead poisoning hazard, the secondary attributes that are a function of the various solutions are presented.

A series of guide criteria is in preparation to acquaint engineers with specific minimum performance recommendations for detoxification methods; these recommendations will be included in a supplementary report.

2. LOCATION AND EVALUATION OF THE SOURCE OF THE HAZARD

Since very limited resources are now available to cities for lead paint poisoning control, virtually all of their efforts are devoted to finding and treating children who have dangerously high levels of lead in their bodies. Widespread screening of housing and removal of the hazard from all dwellings containing accessible leaded materials is not financially feasible at the present time, but in view of the nature of the problem and the disease, this approach offers the only way of completely eliminating the problem. The steps that should be followed in dealing with the problem of plumbism are outlined in Figure I, Hazard Elimination Flow Chart.



2.1. Location of the Source of the Hazard

Although most cases of plumbism are caused by children eating lead paint obtained from walls and ceilings at home, other sources of leaded material (including those outside the home) have been found to cause lead poisoning. For example: children may eat leaded materials at a baby sitter's home during the day, while their parents are working or they may chew on items not normally thought to be dangerous such as painted toys or pencils. In a recent survey $\frac{1}{}$ New York City found that many lead pencils contained dangerous levels of lead; the hazardous material was not in the lead, where one might expect it to be, but in the paint coating the pencils. In another study $\frac{2}{}$ tubes containing a leading brand of toothpaste were found to contain 99% lead. Poor children are not the only ones who chew on the above items.

A preliminary <u>Hazard Source Worksheet</u>, shown in Figure II, has been prepared in order to assist inspectors to make a systematic determination of the location of the hazardous material.

2.2. Determination of the Extent of the Hazard

Since the person making decisions about hazard elimination methods may not be the building inspector who actually visits a residence, a standard format has been drawn up to describe the condition of a dwelling unit; this is shown in Figure III, Hazard Evaluation Worksheet.

Using this information, an appropriate solution to each unique set of circumstances can be chosen. For example, if an area is scheduled for urban renewal in the near future or an expressway will be built shortly where the dwelling now stands, it is probable that only temporary

Figure II HAZARD SOURCE WORKSHEET

		of Inspection:
ocation:	S	treet
	Apt. #	Telephone No.
	Name of Victim	Name of Parent/Guardian

Around neighborhood (Specify:

2. a.

b.

с.

b.

3. a.

Day Care Center	······································
At playground	`
At babysitter (Specify:	
Don't Know	/
Other (Specify:)
When your child is at home, what room(s) does Living room Dining area Kitchen (If answer yes, proceed to Bathroom (If answer yes, proceed to Attic area Bedrooms Basement Hall Garage Workshop Don't Know Other	2b.)
You said that your child spends a good deal of he like to play around or under the kitchen si	
You told me that your child plays a lot in the seen him/her playing around or under the sink?	
Have you ever seen your child eating or pickin area or object in your house?Yes proceed to 3.b.)	
What are these areas and objects you are refer	ring to?
Area	Objects
Walls Windows and/or window sills Doors and/or door jambs Railings Exposed pipes Radiators Floor	<pre>Furniture (Specify: Toys Pencils Play pen Carriage Crib Don't Know</pre>

4. a. Have you ever seen your child eating paint or dirt from any object or area outside of your home? ____ Yes ____ No

If answer is yes, proceed to 4.b.

Don't Know

Other (Specify: _

b. Could you show me or tell me where this happened?

Area

<u>Object</u>

____ Other (Specify: _____

)

Front Yard Playground		Railings (porch, balcony, etc.) Fire escape
Neighbor's Yard		Street sign posts and lamp posts
Don't Know Other (Specify:	,	Exterior wall of dwelling Fence
		Don't know
		Other (Specify:)

5. a. Has anyone ever told you that they saw your child eating paint or dirt?

If yes, proceed to 5.b.

b. Could you tell me what they said and where they saw your child eat the paint (dirt)? 5

Figure III

HAZARD EVALUATION WORKSHEET

Part 1

		Date	of Inspect	ion:		
		Insp	ector(s): _			
			-			
Name of Victim:						
	Street		,	pt. #	' Telep	phone No.
Suture of Area:	Urban Renewal Transportation Ch No Changes Planne Other (Specify:	ed	e., subway,	expressway,	etc. plan	ned))
Description of Home:	Brick Frame # Fl	Loors # A	pts. High-	Rise Row I	Detached A	Ige
General Condition of	E Building: Sound	Deterio	rated Di	lapidated		
Sound housing has r of regular maintenar pair than could be p defects which requir	nce. Deteriorated h provided by regular	nousing ha maintenan	s defects r ce. Dilapi	equiring mor dated housin	e extensiv ng has crit	ve re- cical
Condition of Public	Halls: Peeling Pa	aint Flake	s on Floor	Defective F	laster Sa	mples Taken
Condition of Victim	Peeling Pa	aint Flake	s on Floor	Defective F		eeth Marks n Woodwork
Person Taking Care o	of Child:			Name		
-	<u> </u>		Rela	tionship		
		Addre	ss (if diff	erent from v	victim's)	
		Telepho	ne No. (if	different fr	om victim)	
Victim is Boarded Ou If Yes: Daily	it:YesN	No Weekends	Night	s Inte	rmittently	r
No. of People Living	g at this address: _	<u>.</u>				
freatment: Board of Out Pati			Private Phy Hospitalize Repeater		v Long Trea	-
To be Filled Out fro Owner of Building:				170 %	bong rica	Weeks
Jwher of Building:		Name			Telephone	Number
		Address			Est. Valu	ue of Bldg.
	1	INSTRUCTIO	NS			
 Draw the floor p always use B for in each room whe are planar can b arises concernin door surfaces. 	of the Hazard Evalu olan to illustrate h the bathroom and H en you inspect the m have the same number ng apartment labelin Number the windows Dus surfaces and st	nazard loc K for the room. All r. Refer ng. Use t separatel	ation. Lab kitchen. N wall surfa to the samp he room and y.	Number the wa lees in the s le floor pla l wall locati	alls and wi ame room t an if any q on scheme	ndows hat uestion for

- scheme. For example if kitchen wall K2 has peeling and/or blistering paint put K2 in the appropriate box. Locate hole number and size, i.e. 5/K2 in the less than 15" diameter box means 5 holes in wall K2 less than 16" diameter.

Indicate ceiling height for each room on the floor plan.
 Under General Comments, the following items should be included:

- a) Causes such as:

 - i. exterior water leaks,
 ii. interior water leaks,
 iii. moisture and condensation,

 - iv. vandalism,
 v. occupant use,
 vi. aging,
 vii. interior or exterior vibration,
 viii. expansion and contraction, etc.
- b) Recommendations as to whether rehabilitation or repair should be carried out,
- c) Other code violations observed, and,
- d) Other observations reflecting the inspectors opinions.

						PART	2												
			WAL	LS	CEIL	ING	WC	ODWC) RK		FIX	TURE	S						
			PAINT	PLASTER	PAINT	PLASTER	PAINT	WOOD	SEALANT	RADIATORS	PLUMBING FIXTURES	RAILINGS	CABINETS	OTHER					
		LOOSE MATERIAL LYING AROUND																	
	ILITY	BLISTERING AND PEELING																	
	ACCESSIBILITY	CHEWABLE SURFACE CONFIGURATION																	
	AC	CHIPPING																	
NO	CR	ACKING																	
OBSERVATION		LGING																	
SEF	DIAMETER	LESS THAN 16"																	
08	E DIAN ≰ NUM	16"-24"																	
	HOLE	OVER 24"																	
		IRFACE ATNESS																	
		SURFACE TERIORATION																	
	PO	OR ADHESION (TAPE)																	
		OOR ADHESION ALLET)																	
VSICA	DE	ASTER TERIORATION AIL)																	
РНΥ		DOD SOUNDNESS AIL)																	
	го	THER																	
CHEMICAL	FII	ELD (SPECIFY)																	
CHEN		ABORATORY PECIFY)																	

measures should be taken to remove the source of the hazard. In cases where the walls have good structural integrity, but there is blistering and peeling paint, a reasonable solution would be to remove the loose paint and all paint from chewable surfaces. There would still be a certain potential for recurrence of the problem, but the immediate hazard would be removed, and periodic inspection could be used to prevent the problem from reappearing.

In situations where a great deal of the plaster substrate has poor integrity, i.e., there are holes and bulges, the most rational solution to the problem would be to cover the walls with a suitable material. Another possible solution would be to remove all of the paint from the dwelling unit, but this would probably be a poor choice, since the condition of the walls would most likely violate other housing code regulations. The nature and extent of the deterioration of a residence can be easily determined if the format outlined in the Hazard Evaluation Worksheet is followed.

2.3. Commentary on Worksheets

A word of caution must be expressed in regard to the use of the worksheets. They are designed as guidelines for gathering accurate information on questions of interest to a housing inspector (not necessarily in the order presented here). However, it cannot be emphasized too strongly that the reliability of the information gathered will be greatly dependent upon the way in which the questions are asked. For example, if the inspector is too blunt or too cavalier in asking these questions, the respondents may become offended and give false information.

Thus, it would be highly advisable for any city planning to use these or other worksheets to hold an appropriate training course, for those personnel involved, on the proper way to gather the information.

3. HAZARD TREATMENT

3.1. Implementation Decisions

Although many factors are involved in deciding whether or not a residence will be deleaded, the one basic factor that overrides all others is the balance between the cost of deleading and the cost of losing a dwelling unit from the housing stock.

If the building is structurally unsound, and/or there are many housing code violations, the cost of deleading and restoring the building to an acceptable level of occupancy may make abandonment by the owner a quite likely choice. The landlord, quite naturally, will only do something about the problem if he can expect a reasonable return on his investment. If the landlord refuses to alleviate the hazardous conditions, the proper authorities have to decide if the cost of losing a dwelling outweighs the costs involved in rendering the unit suitable for habitation.

Courses of action that may be followed include:

- a. Making low cost loans available to make it advantageous for the landlord to do the work.
- b. Doing the work and trying to collect the cost back from the landlord.
- c. Taking control of the property and restoring it.
- d. Abandoning the dwelling unit if restoration costs are unreasonably high.

Factors that should be considered in making the "go-no go" decision include interactions between:

a. The nature and extent of the hazard.

b. The degree of removal of the hazard desired.

c. Detoxification methods available, and

d. Secondary attributes gained by the solutions available.

Available funds, and anticipated benefits, will most likely determine the nature and extent of the work that will be done.

3.2. Detoxification Guidelines

Many trade-offs are necessary in the selection of lead hazard elimination methods and the extent to which they are applied.

As previously stated, one performance requirement that should be considered above all others, in making a decision about deleading, is that the method used should reduce or eliminate the exposure of susceptible children to lead poisoning.

There are two basic technological procedures that can be used to eliminate the hazard.

- a. Removal of all hazardous material, and
- b. Covering up of all of the hazardous material to render it inaccessible.

Only <u>complete</u> application of one of the above methods will render a residence completely lead-free.

If deleading is less than complete, potential recurrence of the problem via accessibility of the residual leaded material should be considered. The various accessibility configurations defined in Figure

IV, <u>Decision Model - Part I</u>, should be considered when determining the extent to which leaded material will be made inaccessible.

Figures IV and V, <u>Decision Model - Part I and Part II</u>, respectively, present the options that should be considered in hazard elimination and serve as an index to more detailed matrices that show the relationships that exist between currently available detoxification methods and the attributes gained from their implementation.

Both deleading techniques and other factors that should be considered in conjunction with deleading, are listed in the following matrices:

Figure VI: Matrix I. Removal Methods
Figure VII: Matrix II. Surface Repair Methods
Figure VIII: Matrix III. Cover Up - Unfinished Membrane Material
Figure IX: Matrix IV. Cover Up - Unfinished Rigid Material
Figure X: Matrix V. Cover Up - Prefinished Rigid Material, and
Figure XI: Matrix VI. Surface Finish Methods

The same basic formats can be used to evaluate innovative techniques for deleading, if and when they become available.

3.3. Attributes of Detoxification Methods

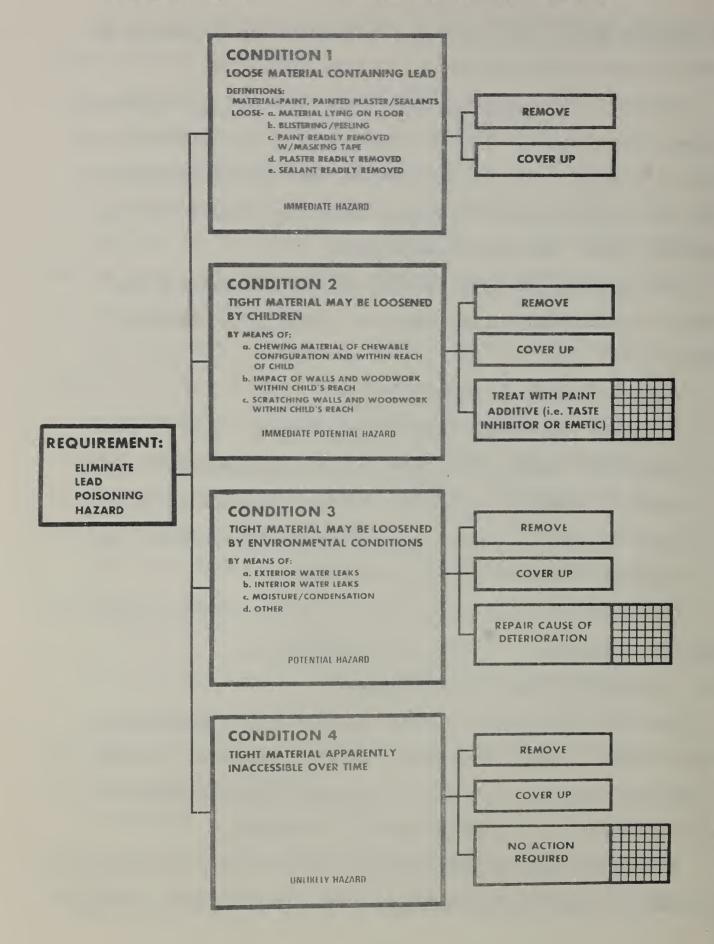
Once again, the primary attribute required of every detoxification method is that it render the hazardous material inaccessible. Success in complying with this requirement is dependent both on the method of hazard removal and the extent to which it is implemented.

The many secondary properties that are inherent parts of specific deleading procedures should be considered very carefully when selecting

Figure IV

HAZARD ELIMINATION

DECISION MODEL - PART 1

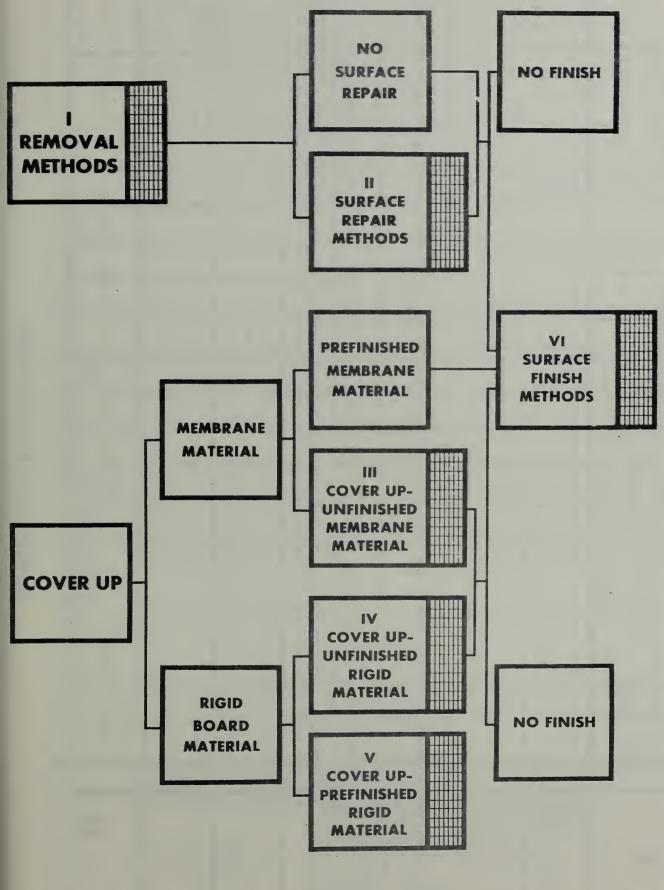




HAZARD ELIMINATION

....

DECISION MODEL PART 2



IMPLEMENTATION SUPPORTIVE & TOTAL COST COST IMPLEMENTATION ATTRIBUTES 2 MATE- EQUIP-2 LABOR 0 TIME DEGREE 00 USER INVOLVEMENT d LEAD e ELEC-I CAS DUST HAZARDHAZARD WORK ARDOUSARDOUS **REMOVAL METHODS** • WASTE 4 SUPPORTIVE ATTRIBUTES INSTALLATION HEALTH & SAFETY CHEM-ICAL SOL-VENT b LEAD FUME IN SPECIAL PRECON DITIONS a OPEN b J HA.ZARD INACCESSIBILITY CEILING WOOD-WORK OTHER WALLS HEAT ~ HEAT ~ NOOSENING OTHER OTHER WALLS CEILING CEILING WOOD. SOFTEMING SOFTEMING OPRO OPRO OTHER OTHER WALLS WALLS OTHER PLASTER & SEALANT OTHER REMOVAL SAND SCRAPE υ 20 •

Figure VI

		TOTAL COST ISUPPORTIVE & IMPLEMENTATION													
	BUTES	TOTAL COST 13	3				-								
	N ATTRI	EQUIP- MENT 12													
	IMPLEMENTATION ATTRIBUTES	MATE- RIAL													
	IMPLEA	LABOR 10													
		TIME													
		DEGREE OF FINISH 8													
	EMENT	USER 7													
A	INVOLVEMENT	COM- MUNITY	100												
		WASTE DIS- POSAL						Τ		Γ	Γ				
ビノ	IES	ANCIL- LARY WORK	480							Γ					
JUKIALER	SUPPORTIVE ATTRIBUTES	INSTALLATION HEALTH & SAFETY 3													
	SU	SPECIAL PRECONDITIONS													
		HAZARD INACCESSIBILITY 1	1.1												
		-	WALLS	CEILING	3 V/OOD- WORK	4 OTHER	WALLS	CEILING WOOD	WORK OTHER	WALLS	CEILING		OTHER	ATERIALS AATRIX)	
		=	-		LAICH 3	4	_ (AAJOR REPAIR	m 4	×	DIACTED 2	1001EK	4	RIGID BOARD MATERIALS (SEE COVER UP MATRIX)	

TOTAL COST (SUPPORTIVE & IMPLEMENTATION) 4 COVER UP - UNFINISHED MEMBRANE MATERIAL TOTAL IMPLEMENTATION ATTRIBUTES 13 EQUIP-12 LABOR RIAL = 10 TIME 0 DEGREE OF FINISH œ USER INVOLVEMENT ~ COM-0 WASTE DIS-POSAL ŝ ANCIL-LARY WORK SUPPORTIVE ATTRIBUTES INSTALLATION HEALTH & SAFETY e **PRECIAL** PRECONDITIONS HAZARD NACCESSIBILITY WALLS CEILING WOOD. OTHER VALLS CEILING WOOD. WORK OTHER CEMENTITIOUS² CENTING MATERIAL 3 WORD CEILING WOOD-WORK WALLS OTHER WALLS PLASTER OTHER FABRIC

Figure VIII

					~	5								
		>>>	COVER UP - UNTINISHED	25		5								
		P.	SUPPORTIVE ATTRIBUTES	TES		INVOLVEMENT	AENT		- I	IMPLEMENTATION ATTRIBUTES	ATION A	TRIBUTE		
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BOARD 3 WORK								+	+	+	+			
				t	t	t	t	t		$\left \right $				
2	0													
PLYWOOD 3 WORK														
4 OTHER	×							-		-	_	-		
1 WALLS	S					+	+	+		+	+	+		
U A D D D A D D 2 CEILING	U			1	1	1		+	+	+	+	-		
e	Ó×						1	+		+	+	+		
4 OTHER	œ						1	+	+	+	+	+		
1 WALLS	S						1	-		-	-	_		
	46							+		-	-	-		
MELAL 3 WOOD.	ó×			1	1	1		1	-	+	+	-		
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CINEK 3 WOOR	Yo									_	_	_		
4 OTHER	α			1	1		1	+	1	-	_	-		
					-									
							-1	-	-	_	_			

Figure IX

Figure X

	NCE	ACCEPTABILITY																
	IN-USE PERFORMANCE	DURABILITY & STABILITY																
1	2	HEALTH & SAFETY																
AL	_	TOTAL COST (SUPPORTIVE & IMPLEMEN- TATION)																
RIGID MATERIAL	BUTES	TOTAL COST																
NAI	IMPLEMENTATION ATTRIBUTES	EQUIP- MENT 12																
10	AENTATIC	MATE- RIAL															-	7
RIG	IMPLEA	LABOR 10	-															
		TIME															6	1
HSI		DEGREE OF FINISH																
PRE-FINISHED	EMENT	USER 7																
PRE	INVOLVEMENT	COM- MUNITY																
-		WASTE DIS- POSAL																
R UP	ES	ANCIL- LARY WORK																
COVER	SUPPORTIVE ATTRIBUTES	INSTALLATION HEALTH & SAFETY																
	SUP	SPECIAL PRECONDITIONS ISUPPORT REQUIREMENTS																
		SPECIAL PRECONDITIONS SUPPORT NACCESSIBILITY REQUIREMENTSI																
			PAPERED	PLASTIC	PAINTED	PLASTIC	PAPERED	PAINTED	PLASTIC	3 PAPERED	PAINTED	2 COATED		PAINTED	PLASTIC MEM- BRANE			
		>	A GYPSUM ¹	BOARD 2	8	PLYWOOD	4.	C	HARDBOARD 2	e	-	MEIAL 2	E REINFORCED PLASTIC		N S	6 OTHER		

Figure XI

SURFACE FINISH METHODS

Ŀ	ACCEPTABILITY																														
IN-USE PERFORMANCE	DURABILITY & STABILITY 16																														
	HEALTH & SAFETY 15	4																													
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methods to eliminate the plumbism problem. These characteristics include factors such as the health of both the occupant and deleading workers, the potential for recurrence of the problem, the degree of rehabilitation obtained, etc. Cost factors can be assigned to many of these considerations since they involve both time and labor. A more detailed description of the above attributes follows.

3.3.1. Hazard Inaccessibility

Accessibility to residual leaded material is related to both the degree of hazard elimination and the deleading method used. For example: if only loose leaded material and leaded material from chewable surfaces are removed, then access to leaded material can be gained by (a) loosening of tight material within reach and (b) loosening of tight material by natural causes such as moisture. If a covering is used that can be torn away, then the hazardous material beneath it is accessible.

3.3.2. Special Preconditions

Certain conditions are required before many hazard removal techniques can be implemented. For example: if a facing is to be put up with adhesive, all loose material should be removed from the surface to be covered, and the surface must be free of moisture, oil, dirt, etc. If rigid boards are to be applied, there are certain support requirements for the boards, such as the degree of planarity, support spacings, etc. 3.3.3. Installation Health and Safety

Many of the available hazard removal techniques have health problems associated with them. For example: removing leaded paints by sanding creates a highly toxic fine leaded dust, softening leaded paint with an open flame can give rise to lead fumes in addition to presenting a fire hazard, cutting various board materials can give rise to a fine dust that can be injurious, etc.

3.3.4. Ancillary Work

Certain deleading procedures may require additional work to be done in conjunction with implementation of the technique. For example: putting up wall board may require the relocation of plumbing, electrical and heating fixtures.

3.3.5. Waste Disposal

Care should be taken to ensure that leaded wastes are disposed of in a manner that will render them inaccessible to children. Other waste materials should be disposed of in a manner such that they do not present a hazard.

3.3.6. Community Involvement

Since limited funds are available for deleading, and cost savings can be realized by utilization of "self-help" labor, certain advantages can be gained by selecting hazard removal methods that lend themselves to the use of semi-skilled and unskilled labor. A secondary fall-out from using this type of labor is the training given in the course of carrying out a community action program. The skills gained can give the people involved a chance to improve their lot in life.

3.3.7. User Involvement

Some deleading techniques will require the relocation of occupants from a residence, because of the hazards involved, while they are being implemented. Other methods require mere dislocation from a room.

3.3.8. Degree of Finish

Many detoxification techniques leave the dwelling in a crude, unfinished state unless further finish work is done, i.e., scraping. Other methods provide a finished surface in the course of carrying out the method; i.e., prefinished panels.

3.3.9. In-Use Performance

In general, consideration of performance properties is only applicable to finished surfaces since individual components, such as gypsum board, were not designed for use without the application of a protective surface coating.

3.3.9.1. Occupant Health and Safety

Attributes to be considered include:

- a. Fire Resistance
- B. Toxicity
- c. Anthropometric Fit
- d. Vermin Resistance
- e. Mold Growth Resistance
- f. Dirt Collection Resistance

3.3.9.2. Durability and Stability

Properties to be taken account of include:

- a. Structural Integrity
- b. Scratch Resistance
- c. Impact Resistance
- d. Abrasion Resistance
- e. Moisture Resistance
- f. Vibration Resistance

- g. Color Fastness
- h. Aging Resistance

3.3.9.3. Acceptability

Several factors in addition to those which affect health and the structural integrity of a residence should be considered.

- a. Washability of the Surface
- b. Maintainability of the Surface
- c. Acoustic Properties
- d. Color
- e. Reflectance
- f. Attachment Capability
- g. Appearance
- h. Modifiability

4. PERFORMANCE CRITERIA

Attributes are qualitative descriptors of the nature of performance whereas criteria are the quantitative statements of the levels of performance that are to be achieved.

Criteria for the evaluation of lead paint poisoning elimination methods are being established on the basis of current technical knowledge to assist municipalities in decision making. The criteria will be structured so that present methods as well as innovative methods can be judged as to their merits for the particular problem that is confronted.

The criteria are being indexed in the format of a matrix that relates attributes to affected elements. The affected elements include both vertical and horizontal surfaces, vertical and horizontal assemblies, and fixtures that include windows, doors, railings, cabinets and other

affected elements. The attributes considered are structural integrity, installation health and safety, occupant health and safety, waste disposal, ancillary work, degree of finish and durability and stability.

The structure of each method evaluation is as follows:

- 1. Requirement a description of what performance is expected.
- Criterion the actual "numbers" that would satisfy the requirement.
- 3. Test a statement of those standard test methods or a description of an adequate test that can be used to verify the "numbers" stated in the criterion.
- Commentary a statement of the rationale used for establishing the criterion that satisfies the requirement.

These criteria, which are intended to acquaint engineers with the specific minimum performance recommendations that apply to detoxification methods, will be included in a supplementary report.

Factors such as user involvement, community involvement and cost, are not resultant effects of the implementation of the hazard elimination method chosen, and, therefore, will not be considered.

5. FOOTNOTES

- "Paint Pencil Problems," <u>The Washington Post</u>, September 21, 1971, p. B2.
- "Toothpaste Tube Warning," <u>The Washington Post</u>, September 16, 1971, p. C7.

