

Appropriate Methods for Reducing Lead-Paint Hazards in Historic Housing

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Lead-based paint, a toxic material, was widely used in North America on both the exteriors and interiors of buildings until well into the second half of the twentieth century. If a "historic" place is broadly defined in terms of time as having attained an age of fifty years, this means that almost every historic house contains some lead-based paint. In its deteriorated form, it produces paint chips and lead-laden dust particles that are a known health hazard to both children and adults. Children are particularly at risk when they ingest lead paint dust through direct hand-to-mouth contact and from toys or pacifiers. They are also at risk when they chew lead-painted surfaces in accessible locations. In addition to its presence in houses, leaded paint chips, lead dust, or lead-contaminated soil in play areas can elevate a child's blood lead level to a degree that measures to reduce and control the hazard should be undertaken.

The premise of this Preservation Brief is that historic housing can be made lead-safe for children without removing significant decorative features and finishes, or architectural trimwork that may contribute to the building's historic character (see fig. 1). Historic *housing*-encompassing private dwellings and all types of rental units-is necessarily the focus of this Brief because federal and state laws primarily address the hazards of lead and lead-based paint in housing and day-care centers to protect the health of children under six years of age. Rarely are there mandated requirements for the removal of lead-based paint from non-residential buildings.

Ideally, most owners and managers should understand the health hazards created by lead-based paint and voluntarily control these hazards to protect young children. A stricter approach has been taken by some state and federal funding programs which have compliance requirements for identifying the problem, notifying tenants, and, in some cases, remedying lead hazards in housing (see Legislation Sidebar, pg.xx). With new rules being written, and new products and approaches being developed, it is often difficult to find systematic and balanced methodologies for dealing with lead-based paint in historic properties.

This Preservation Brief is intended to serve as an introduction to the complex issue of historic lead-based paint and its management. It explains how to plan and implement lead-hazard control measures to strike a balance between preserving a historic building's significant materials and features and protecting human health and safety, as well as the environment. It is not meant to be a "how-to guide" for undertaking the work. Such a short-cut approach could easily result in creating a

greater health risk, if proper precautions were not taken. Home renovators and construction workers should be aware that serious health problems can be caused by coming into contact with lead. For this reason, there are also laws to protect workers on the job site (see Worker Safety Sidebar). Controlling the amount of waste containing lead-based paint residue will also reduce the impact on the environment. All of these considerations must be weighed against the goal of providing housing that is safe for children. Lead in Historic Paints

Lead in Historic Paints

Lead compounds were an important component of many historic paints. Lead, in the forms of lead carbonate and lead oxides, had excellent adhesion, drying, and covering abilities. White lead, linseed oil, and inorganic pigments were the basic components for paint in the 18th, 19th, and early 20th centuries. Lead-based paint was used extensively on wooden exteriors and interior trimwork, window sash, window frames, baseboards, wainscoting, doors, frames, and high gloss wall surfaces such as those found in kitchens and bathrooms. Almost all painted metals were primed with red lead or painted with lead-based paints. Even milk (casein) and water-based paints (distemper and calcimines) could contain some lead, usually in the form of hiding agents or pigments. Varnishes sometimes contained lead. Lead compounds were also used as driers in paint and window glazing putty.

In 1978, the use of lead-based paint in residential housing was banned by the federal government. Because the hazards have been known for some time, many lead components of paint were replaced by titanium and other less toxic elements earlier in the 20th century. Since houses are periodically repainted, the most recent layer of paint will most likely not contain lead, but the older layers underneath probably will. Therefore, the only way to accurately determine the amount of lead present in older paint is to have it analyzed.

It is important that owners of historic properties be aware that layers of older paint can reveal a great deal about the history of a building and that paint chronology is often used to date alterations or to document decorative period colors (see figs. 2, 3). Highly significant decorative finishes, such as graining, marbleizing, stenciling, polychrome decoration, and murals should be evaluated by a painting conservator to develop the appropriate preservation treatment that will stabilize the paint and eliminate the need to remove it. If such finishes must be removed in the process of controlling lead hazards, then research, paint analysis, and documentation are advisable as a record for future research and treatment.

Planning for Lead Hazard Reduction in Historic Housing

Typical health department guidelines call for removing as much of the surfaces that contain lead-based paint as possible. This results in extensive loss or modification

of architectural features and finishes and is not appropriate for most historic properties (see fig. 4). A great number of federally-assisted housing programs are moving away from this approach as too expensive and too dangerous to the immediate work environment. A preferred approach, consistent with The Secretary of the Interior's Standards for the Treatment of Historic Properties, calls for removing, controlling, or managing the hazards rather than wholesale-or even partial-removal of the historic features and finishes (fig. 5). This is generally achieved through careful cleaning and treatment of deteriorating paint, friction surfaces, surfaces accessible to young children, and lead in soil (see figs. 6, 7). Lead-based paint that is not causing a hazard is thus permitted to remain, and, in consequence, the amount of historic finishes, features and trimwork removed from a property is minimized.

Because the hazard of lead poisoning is tied to the risk of ingesting lead, careful planning can help to determine how much risk is present and how best to allocate available financial resources. An owner, with professional assistance, can protect a historic resource and make it lead-safe using this three-step planning process:

- I. Identify the historical significance of the building and architectural character of its features and finishes;
- II. Undertake a risk assessment of interior and exterior surfaces to determine the hazards from lead and lead-based paint; and,
- III. Evaluate the options for lead hazard control in the context of historic preservation standards.

I. Identify the historical significance of the building and architectural character of its features and finishes

The historical significance, integrity, and architectural character of the building always need to be assessed before work is undertaken that might adversely affect them. An owner may need to enlist the help of a preservation architect, building conservator or historian. The State Historic Preservation Office (SHPO) may be able to provide a list of knowledgeable preservation professionals who could assist with this evaluation.

Features and finishes of a historic building that exhibit distinctive characteristics of an architectural style; represent work by specialized craftsmen; or possess high artistic value should be identified so they can be protected and preserved during treatment. When it is absolutely necessary to remove a significant architectural feature or finish-as noted in the first two priorities listed below-it should be replaced with a new feature and finish that matches in design, detail, color, texture, and, in most cases, material.

Finally, features and finishes that characterize simple, vernacular buildings should be retained and preserved; in the process of removing hazards, there are usually reasonable options for their protection. Wholesale removal of historic trim, and other seemingly less important historic material, undermines a building's overall character and integrity and, thus, is never recommended.

For each historic property, features will vary in significance. As part of a survey of each historic property (see figure 8), a list of priorities should be made, in this order:

- Highly significant features and finishes that should always be protected and preserved;
- Significant features and finishes that should be carefully repaired or, if necessary, replaced in-kind or to match all visual qualities; and
- Non-significant or altered areas where removal, rigid enclosure, or replacement could occur.

This hierarchy gives an owner a working guide for making decisions about appropriate methods of removing lead paint.

II. Undertake a risk assessment of interior and exterior surfaces to determine hazards from lead and lead-based paint.

While it can be assumed that most historic housing contains lead-based paint, it cannot be assumed that it is causing a health risk and should be removed. The purpose of a risk assessment is to determine, through testing and evaluation, where hazards from lead warrant remedial action (see fig. 9). Testing by a specialist can be done on paint, soil, or lead dust either on-site or in a laboratory using methods such as x-ray fluorescence (XRF) analyzers, chemicals, dust wipe tests, and atomic absorption spectroscopy. Risk assessments can be fairly low cost investigations of the location, condition, and severity of lead hazards found in house dust, soil, water, and deteriorating paint. Risk assessments will also address other sources of lead from hobbies, crockery, water, and the parents' work environment. A public health office should be able to provide names of certified risk assessors, paint inspectors, and testing laboratories. These services are critical when owners are seeking to implement measures to reduce suspected lead hazards in housing, day-care centers, or when extensive rehabilitations are planned.

The risk assessment should record:

- the paint's location
- the paint's condition
- lead content of paint and soil
- the type of surface

- (friction; accessible to children for chewing; impact)
- how much lead dust is actively present
- how the family uses and cares for the house
- the age of the occupants who might come into contact with lead paint.

It is important from a health standpoint that future tenants, painters, and construction workers know that lead-based paint is present, even under treated surfaces, in order to take precautions when work is undertaken in areas that will generate lead dust. Whenever mitigation work is completed, it is important to have a clearance test using the *dust wipe method* to ensure that lead-laden dust generated during the work does not remain at levels above those established by the Environmental Protection Agency (EPA) and the Department of Housing and Urban Development (HUD) (see Action Levels Chart). A building file should be maintained and updated whenever any additional lead hazard control work is completed.

Hazards should be removed, mitigated, or managed in the order of their health threat, as identified in a risk assessment (with 1. the greatest risk and 8. the least dangerous):

- 1. Peeling, chipping, flaking, and chewed interior lead-based paint and surfaces
- 2. Lead dust on interior surfaces
- 3. High lead in soil levels around the house and in play areas (check state requirements)
- 4. Deteriorated exterior painted surfaces and features
- 5. Friction surfaces subject to abrasion (windows, doors, painted floors)
- 6. Accessible, chewable surfaces (sills, rails) if small children are present
- 7. Impact surfaces (baseboards and door jambs)
- 8. Other interior surfaces showing age or deterioration (walls and ceilings)

III. Evaluate options for hazard control in the context of historic preservation standards.

The Secretary of the Interior's Standards for the Treatment of Historic Properties-established principles used to evaluate work that may impact the integrity and significance of National Register properties-can help guide suitable health control methods. The preservation standards call for the protection of historic materials and historic character of buildings through stabilization, conservation, maintenance, and repair. The rehabilitation standards

call for the repair of historic materials with replacement of a character-defining feature appropriate only when its deterioration or damage is so extensive that repair is infeasible. From a preservation standpoint, selecting a hazard control method that removes *only* the deteriorating paint, or that involves some degree of repair, is always preferable to the total replacement of a historic feature.

By tying the remedial work to the areas of risk, it is possible to limit the amount of intrusive work on delicate or aging features of a building without jeopardizing the health and safety of the occupants. To make historic housing lead-safe, the gentlest method possible should be used to remove the offending substance—lead-laden dust, visible paint chips, lead in soil, or extensively deteriorated paint. Overly aggressive abatement may damage or destroy much more historic material than is necessary to remove lead paint, such as abrading historic surfaces. Another reason for targeting paint removal is to limit the amount of lead dust on the work site. This, in turn, helps avoid expensive worker protection, cleanup, and disposal of larger amounts of hazardous waste.

Whenever extensive amounts of lead must be removed from a property, or when methods of removing toxic substances will impact the environment, it is extremely important that the owner be aware of the issues surrounding worker safety, environmental controls, and proper disposal (see fig. 10, 11). Appropriate architectural, engineering and environmental professionals should be consulted when lead hazard projects are complex.

Following are brief explanations of the two approaches for controlling lead hazards, once they have been identified as a risk. These controls are recommended by the Department of Housing and Urban Development in *Guidelines for the Evaluation and Control of Lead-Paint Hazards in Housing*, and are summarized here to focus on the special considerations for historic housing:

Interim Controls: Short-term solutions include thorough dust removal; thorough washdown and clean-up of exposed surfaces; paint film stabilization and repainting; covering of lead-contaminated soil; and making tenants aware of lead hazards. Interim controls require ongoing maintenance and evaluation.

Hazard Abatement: Long-term solutions are defined as having an expected life of 20 years or more, and involve permanent removal of hazardous paint through chemicals, heat guns or controlled sanding/abrasive methods; permanent removal of deteriorated painted features through replacement; the removal or permanent covering of contaminated soil; and the use of enclosures (such as drywall) to isolate painted surfaces. The use of specialized elastomeric encapsulant paints and coatings can be considered as permanent containment of lead-based paint if they receive a 20-year manufacturer's warranty or are approved by a certified risk assessor. One should be aware of their advantages and drawbacks for use in historic housing.

Within the context of the historic preservation standards, the most appropriate method will always be the least invasive. More invasive approaches are considered only under the special circumstances outlined in the three-step process. An inverted triangle (see fig. 12) shows the greatest number of residential projects fall well

within the "interim controls" section. Most housing can be made safe for children using these sensitive treatments, particularly if no renovation work is anticipated. Next, where owners may have less control over the care and upkeep of housing and rental units, more aggressive means of removing hazards may be needed. Finally, large-scale projects to rehabilitate housing or convert non-residential buildings to housing may successfully incorporate "hazard abatement" as a part of the overall work.

Appropriate Methods for Controlling Lead Hazards

In selecting appropriate methods for controlling lead hazards, it is important to refer to Step I. of the survey where architecturally significant features and finishes are identified and need to be preserved. Work activities will vary according to hazard abatement needs; for example, while an interim control would be used to stabilize paint on most trimwork, an accessible window sill might need to be stripped prior to repainting. Since paint on a window sill is usually not a significant finish, such work would be appropriate. Other appropriate methods for controlling lead hazards are summarized in the accompanying chart (see fig. 13).

The method selected for removing or controlling the hazards has a direct bearing on the type of worker protection as well as the type of disposal needed, if waste is determined to be hazardous (see fig. 14). Following are examples of appropriate methods to use to control lead hazards within an historic preservation context.

Historic Interiors (deteriorating paint and chewed surfaces). Whenever lead-based paint (or lead-free paint covering older painted surfaces) begins to peel, chip, craze, or otherwise comes loose, it should be removed to a sound substrate and the surface repainted. If children are present and there is evidence of painted surfaces that have been chewed, such as a window sill, then these surfaces should be stripped to bare wood and repainted. The removal of peeling, flaking, chalking, and deteriorating paint may be of a small scale and undertaken by the owner, or may be extensive enough to require a paint contractor. In either case, care must be taken to avoid spreading lead dust throughout the dwelling unit. If the paint failure is extensive and the dwelling unit requires more permanent hazard removal, then an abatement contractor should be considered. Many states are now requiring that this work be undertaken by specially trained and certified workers.

If an owner undertakes interim controls, it would be advisable to receive specialized training in handling lead-based paint. Such training emphasizes isolating the area, putting plastic sheeting down to catch debris, turning off mechanical systems, taping registers closed, and taking precautions to clean up prior to handling food. Work clothes should be washed separately from regular family laundry. The preferred method for removing flaking paint is

the wet sanding of surfaces because it is gentle to the substrate and controls lead dust. The key to reducing lead hazards while stabilizing flaking paint is to keep the surfaces slightly damp to avoid ingesting lead dust. Wet sanding uses special flexible sanding blocks or papers that can be rinsed in water or used along with a bottle mister. This method will generally not create enough debris to constitute hazardous waste (see fig. 15).

Other methods for selectively removing more deteriorated paint in historic housing include controlled sanding, using low-temperature heat guns, or chemical strippers. Standard safety precautions and appropriate worker protection should be used. Methods to *avoid* include uncontrolled dry abrasive methods, high heat removal (lead vaporizes at 1100o F), uncontrolled water blasting, and some chemicals considered carcinogenic (methylene chloride). When possible and practicable, painted elements, such as radiators, doors, shutters, or other easily removable items, can be taken to an off site location for paint removal.

In most cases, when interior surfaces are repainted, good quality interior latex or oil/alkyd paints may be used. The paint and primer system must be compatible with the substrate, as well as any remaining, well-bonded, paint.

Encapsulant paints and coatings, developed to contain lead-based paint, rely on an adhesive bonding of the new paint through the layers of the existing paint. The advantages of these special paint coatings is that they allow the historic substrate to remain in-place; reduce the amount of existing paint removed; can generally be applied without extensive worker protection; and are a durable finish. (They cannot, however, be used on friction surfaces.) The drawbacks include their ability to obscure carved details, unless thinly applied in several applications, and difficulty in future removal. If a specialized paint, such as an elastomeric encapsulant paint, is considered, the manufacturer should be contacted for specific instructions for its application. Unless these specialized paint systems are warranted for 20 years, they are considered as less permanent interim controls.

Lead-dust on interior finishes. Maintaining and washing painted surfaces is one of the most effective measures to prevent lead poisoning. Houses kept in a clean condition, with paint film intact and topcoated with lead-free paint or varnish, may not even pose a health risk. Dust wipe tests, which are sent to a laboratory for processing, can identify the level of lead dust present on floors, window sills, and window troughs. If lead dust is above acceptable levels, then specially modified maintenance procedures can be undertaken to reduce it. All paints deteriorate over time, so maintenance must be ongoing to control fine lead dust. The periodic washing of surfaces with a surfactant, such as tri-sodium phosphate (TSP) or its equivalent, loosens dirt and removes lead dust prior to a water rinse and touch-up

painting, if necessary. This interim treatment can be extremely beneficial in controlling lead dust that is posing a hazard (see fig. 16).

Soil/landscape. Soil around building foundations may contain a high level of lead from years of chalking and peeling exterior paint. This dirt can be brought indoors on shoes or by pets and small children if they play outside a house. Lead in the soil is generally found in a narrow band directly adjacent to the foundation. If the bare soil tests high in lead (see Action Levels Chart), it should be replaced to a depth of several inches or covered with new sod or plantings. Care should be taken to protect historic plantings on the building site and, in particular, historic landscapes, while mitigation work is underway (see fig. 17). If an area has become contaminated due to a variety of environmental conditions (for example, a smelter nearby or water tanks that have been sandblasted in the past), then an environmental specialist as well as a landscape preservation architect should be consulted on appropriate site protection and remedial treatments. It is inappropriate to place hard surfaces, such as concrete or macadam, over historically designed landscaped areas, which is often the recommendation of typical abatement guidelines.

Deteriorating paint on exteriors. Deteriorating exterior paint will settle onto window ledges and be blown into the dwelling, and will also contaminate soil at the foundation, as previously discussed. Painted exteriors may include wall surfaces, porches, roof trim and brackets, cornices, dormers, and window surrounds. Most exteriors need repainting every 5-10 years due to the cumulative effect of sun, wind, and rain or lack of maintenance. Methods of paint removal that do not abrade or damage the exterior materials should be evaluated. Because there is often more than one material (for example, painted brick and galvanized roof ornaments), the types of paint removal or paint stabilization systems need to be compatible with each material (see fig. 18). If paint has failed down to the substrate, it should be removed using either controlled sanding/scraping, controlled light abrasives for cast iron and durable metals, chemicals, or low heat. If chemicals are used, it may be necessary to have the contractor contain, filter, or otherwise treat any residue or rinse water. Environmental regulations must be checked prior to work, particularly if a large amount of lead waste will be generated or public water systems affected.

A cost analysis may show that, in the long run, repair and maintenance of historic materials or in-kind replacement can be cost effective. Due to the physical condition and location of wood siding, together with the cost of paint removal, a decision may be made to remove and replace these materials on some historic frame buildings. If the repair or replacement of historic cladding on a primary elevation is being undertaken, such replacement materials should match the historic cladding in material, size, configuration, and detail (see fig. 19). The use of an artificial siding or aluminum coil stock panning systems over wooden trimwork or sills and lintels

(as recommended in some abatement guidelines) is not appropriate, particularly on principal facades of historic buildings because they change the profile appearance of the exterior trimwork and may damage historic materials and detailing during installation. Unless the siding is too deteriorated to warrant repair and the cost is too prohibitive to use matching replacement materials (i.e., wood for wood), substitute materials are not recommended.

The use of specialized encapsulant paint coatings on exteriors-in particular, moist or humid climates, and, to some extent, cold climates-is discouraged because such coatings may serve to impede the movement of moisture that naturally migrates through other paints or mask leaks that may be causing substrate decay. Thus, a carefully applied exterior paint system (either oil/alkyd or latex) with periodic repainting can be very effective.

Friction Surfaces. Interior features with surfaces that-functionally-rub together such as windows and doors, or are subject to human wear and tear, such as floor and steps, are known as friction surfaces. It is unclear how much lead dust is created when friction surfaces that contain lead-based paint, but are top-coated with lead-free paint, rub together because much of the earlier paint may have worn away. For example, if lead dust levels around windows or on painted floors are consistently above acceptable levels, treating nearby friction surfaces should be considered. If surfaces, such as operable windows, operable doors, painted porch decks, painted floors and painted steps appear to be generating lead dust, they should be controlled through isolating or removing the lead-based paint. Window and door edges can be stripped or planed, or the units stripped on or off site to remove paint prior to repainting. Simple wooden stops and parting beads for windows, which often split upon removal, can be replaced. If window sash are severely deteriorated, it is possible to replace them; and vinyl jamb liners can effectively isolate remaining painted window jambs (see fig. 20). When windows are being treated within rehabilitation projects, their repair and upgrading are always recommended. In the event that part or all of a window needs to be replaced, the new work should match in size, configuration, detail, and, whenever possible, material.

Painted floors often present a difficult problem because walking on them abrades the surface, releasing small particles of lead-based paint. It is difficult to remove lead dust between the cracks in previously painted strip flooring even after sanding and vacuuming using special High Efficiency Particulate Air (HEPA) filters to control the lead dust. If painted floors are not highly significant in material, design, or craftsmanship, and they cannot be adequately cleaned and refinished, then replacing or covering them with new flooring may be considered. Stair treads can be easily fitted with rubber or vinyl covers (see fig. 21).

Accessible, projecting, mouthable surfaces. Accessible, chewable surfaces that can be mouthed by small children need not be removed entirely, as some health guidelines recommend. These accessible surfaces are listed as projecting surfaces within a child's reach, including window sills, banister railings, chair rails, and door edges. In many cases, the projecting edges can have all paint removed using wet sanding, a heat gun or chemical strippers, prior to repainting the feature (see fig. 22). If the homeowner feels that there is no evidence of unsupervised mouthing of surfaces, a regular paint may be adequate once painted surfaces have been stabilized. An encapsulant paint that adhesively bonds existing paint layers onto the substrate extends durability. While encapsulant paint systems are difficult to remove from a surface in the future, they permit retention of the historic feature itself. If encapsulant paint is used on molded or decorative woodwork, it should be applied in several thin coats to prevent the architectural detail from being obscured by the heavy paint (see fig 23).

Impact Surfaces. Painted surfaces near doorways and along corridors tend to become chipped and scraped simply because of their location. This is particularly true of baseboards, which were designed to protect wall surfaces, and also for doorjambs. Owners should avoid hitting painted impact surfaces with vacuums, brooms, baby carriages, or wheeled toys. Adding new shoe moldings can give greater protection to some baseboards. In most cases, stabilizing loose paint and repainting with a high quality interior paint will provide a durable surface. Clear panels or shields can be installed at narrow doorways, if abrasion continues, or these areas can be stripped of paint and repainted. Features in poor condition may need to be replaced with new, matching materials (see fig. 24).

Other surfaces showing age or deterioration/ walls and ceilings. Many flat wall surfaces and ceilings were not painted with lead-based paint, so will need to be tested for its presence prior to any treatment. Flat surfaces that contain deteriorating lead-based paint should be repaired following the responsible approach previously cited (i.e., removing loose paint to a sound substrate, then repairing damaged plaster using a skim coat or wet plaster repair (see fig. 25). Drywall is used *only* when deterioration is too great to warrant plaster repair. If walls and ceilings have a high lead content, and extensive paint removal is not feasible, there are systems available that use elastomeric paints with special fabric liners to stabilize older, though intact, wall surfaces.

If a new drywall surface needs to be applied, care should be taken that the historic relationship of wall to trim is not lost. Also, if there are significant features, such as crown moldings or ceiling medallions, they should always be retained and repaired (see fig. 26).

Maintenance after Hazard Control Treatment

Following treatment, particularly where interim controls have been used, ongoing maintenance and re-evaluation become critical. In urban areas, even fully lead-safe houses can be re-contaminated within a year from lead or dirt outside the immediate property. Thus, housing interiors must be kept clean, once lead hazard control measures have been implemented. Dust levels should be kept down by wet sweeping porch steps and entrances on a regular basis. Vacuum cleaning and dusting should be repeated inside on a weekly basis or even more often. Vinyl, tile, and wood floor surfaces should be similarly damp mopped. Damp washing of window troughs and sills to remove new dust should be encouraged several times a year, particularly in the spring and fall when windows will be open. Carpets and area rugs should be steam cleaned or washed periodically if they appear to hold outside dirt.

Housing should be inspected frequently for signs of deterioration by both owner and occupant. Tenants need to be made aware of the location of lead-based paint under lead-free top coats and instructed to contact the owners or property managers when the paint film becomes disturbed (see figure 27). Any leaks, peeling paint, or evidence of conditions that may generate lead-dust should be identified and corrected immediately. Occupants must be notified prior to any major dust-producing project. Dry sanding, burning, compressed air

cleaning or blasting should be not be used. Repairs, repainting, or remodeling activities that have the potential of raising significant amounts of lead dust should be undertaken in ways that isolate the area, reduce lead-laden dust as much as possible, and protect the occupants.

Yearly dust wipe tests are recommended to ensure that dust levels remain below actionable levels. Houses or dwelling units that fail the dust-wipe test should be thoroughly re-cleaned with TSP, or its equivalent, washed down, wet vacuumed and followed by HEPA vacuuming, if necessary, until a clearance dust wipe test shows the area to be under actionable levels (see Action Levels chart). Spaces that are thoroughly cleaned and maintained in good condition are not a health risk (see fig. 28).

Conclusion

The three-step planning process outlined in this Brief provides owners and managers of historic housing with responsible methods for protecting historic paint layers and architectural elements, such as windows, trimwork, and decorative finishes. Exposed decorative finishes, such as painted murals or grained doors can be stabilized by a paint conservator with a glazed or varnished layer without destroying their significance.

Reducing and controlling lead hazards can be successfully accomplished without destroying the character-defining features and finishes of historic buildings. Federal and state laws generally support the reasonable control of lead-based paint hazards through a variety of treatments, ranging from modified maintenance to selective substrate removal. The key to protecting children, workers, and the environment is to be informed about the hazards of lead, to control exposure to lead dust and lead in soil, and to follow existing regulations. In all cases, methods that control lead hazards should be selected that minimize the impact to historic resources while ensuring that housing is lead-safe for children.

ACTION LEVELS

Readers should become familiar with terminology and basic levels that trigger concern and/or action. Check with the appropriate authorities if you have questions and to verify applicable action levels which may change over time.

Blood lead levels: Generally from drawn blood and not a finger stick test which can be unreliable. Units are measured in micrograms per deciliter ($\mu\text{g}/\text{dl}$) and reflect the 1995 standards from the Centers of Disease Control:

Children: 10 $\mu\text{g}/\text{dl}$; level of concern; find source of lead

15 $\mu\text{g}/\text{dl}$ and above; intervention, counseling, medical monitoring.

20 $\mu\text{g}/\text{dl}$ and above; medical treatment

Adults: 25 $\mu\text{g}/\text{dl}$; level of concern; find source of lead

50 $\mu\text{g}/\text{dl}$; OSHA standard for medical removal from the worksite

Lead in paint: Differing methods report results in differing units. Lead is considered a potential hazard if *above the following levels*, but can be a hazard at lower levels, if improperly handled. These are the current numbers as identified by the Department of Housing and Urban Development (1995):

Lab analysis of samples:

5,000 milligram per kilogram (mg/kg) or 5,000 parts per million (ppm), or

0.5% lead by weight.

XRF reading: in milligram per centimeter squared

1 mg/cm²

lead dust wipe test: in micrograms per square foot

Floors 100 $\mu\text{g}/\text{ft}^2$;

Window sills 500 $\mu\text{g}/\text{ft}^2$;

Window troughs 800 $\mu\text{g}/\text{ft}^2$

Lead in soil: high contact bare play areas, listed as parts per million (ppm):

concern: 400 ppm

interim control 2,000 ppm

hazard abatement 5,000 ppm

LEAD-BASED PAINT LEGISLATION

The following summarizes several important regulations that affect lead-hazard reduction projects. Owner's should be aware that regulations change and they have a responsibility to check state and local ordinances as well.

Federal Legislation

Title X (Ten) Residential Lead-Based Paint Hazard Reduction Act of 1992 is part of the Housing and Community Development Act of 1992 (Public Law 102-550). It established that HUD issue "The Guidelines for the Evaluation and Control of Lead-Based Paint Hazards in Housing" (1995) to outline risk assessments, interim controls, and abatement of lead-based paint hazards in housing. Title X calls for the reduction of lead in housing that is federally supported and outlines the federal responsibility towards its own residential units and the need for disclosure of lead in residences, even private residences, prior to sale.

Interim Final Regulations of Lead in Construction Standards (29CFR 1926.62). Issued by the Department of Labor, Occupational Safety and Health Administration (OSHA), these regulations address worker safety, training, and protective measures. It is based in part on environmental air sampling to determine the amount of lead dust generated by various activities.

Toxic Substance Control Act; Title IV. The Environment Protective Agency (EPA) has jurisdiction for setting standards for lead abatement. Also, EPA controls the handling and disposal of hazardous waste generated during an abatement project. EPA will develop standards to establish lead hazards, to certify abatement contractors, and to establish work practice standards for abatement activity. EPA

Regional Offices can provide guidance on the appropriate regulatory agency for states within their region.

State Laws: States generally have the authority to regulate the removal and transportation of lead based paint and the generated waste generally through the appropriate state environmental and public health agencies. Most requirements are for mitigation in the case of a lead-poisoned child, or for protection of children, or for oversight to ensure the safe handling and disposal of lead waste. When undertaking a lead-based paint reduction program, it is important to determine which laws are in place that may affect your project. Call the appropriate officials.

Local Ordinances: Check with local health departments, Poison Control Centers, and offices of housing and community development to determine if there are laws that require compliance by building owners. Rarely are owners required to remove lead-based paint and most laws are to ensure safety if a project is undertaken as part of a larger rehabilitation. Special use permits may be required when an environmental impact may occur due to a cleaning treatment that could contaminate water or affect water treatment. Determine whether projects are considered abatements and will require special contractors and permits.

Owner's Responsibility: Owners are ultimately responsible for ensuring that hazardous waste is properly disposed of when it is generated on their own sites. Owners should check with their state office to determine if the abatement project requires a certified contractor. (National certification requirements are not yet in place.) Owners should establish that the contractor is responsible for the safety of the crew and that all applicable laws are followed, and that transporters and disposers of hazardous waste have liability insurance as a protection for the owner. If an interim treatment is being used to reduce lead hazards, the owner should notify the contractor that lead-based paint is present and that it is the contractor's responsibility to follow appropriate work practices to protect workers and to complete a thorough clean-up to ensure that lead-laden dust is not present after the work is completed.

Worker Safety

Current worker safety standards were established by OSHA's 29 CFR Part 1926, Lead Exposure in Construction; Interim Final Rule, which became effective June 3, 1993. These standards base levels of worker protection on exposure to airborne lead dust. They are primarily targeted to persons working within the construction industry, but apply to any workers who are exposed to lead dust for longer than a specific amount of time and duration. The Interim Final Rule establishes an action level of 30 micrograms of lead dust per cubic meter of air (30 $\mu\text{g}/\text{m}^3$) based on an eight hour, time-weighted average, as the level at which employers must initiate

compliance activities; and it also establishes 50 $\mu\text{g}/\text{m}^3$ of lead dust as the permitted exposure level (PEL) for workers.

The standard identifies responsibilities before, during, and after the actual abatement activity necessary to protect the worker. Before the project begins, it requires an exposure assessment, a written compliance plan, initial medical surveillance, and training. The exposure assessment determines whether a worker may be exposed to lead. OSHA has identified a number of work tasks expected to produce dust levels between 50 and 500 $\mu\text{g}/\text{m}^3$ of air, including manual demolition, manual scraping, manual sanding, heat gun applications, general cleanup, and power tool use when the power tool is equipped with a dust collection system. It is an OSHA requirement that, at a minimum, a HEPA filtered half-face respirator with a protection factor of 10 be used for these operations. Initial blood lead level (BLL) base lines are established for each worker. Actual dust levels are monitored by air sampling of representative work activities, generally by an industrial hygienist or an environmental monitoring firm. Protective equipment is determined by the dust level. For all workers exposed at, or above, the action level for over 30 days in a 12-month period, BLLs are tested on a regular basis of every 2 months for the first 6 months and every 6 months thereafter. After completing a project, maintenance, medical surveillance, and recordkeeping responsibilities continue.

HEPA vacuums, HEPA respirators, and HEPA filters, which substantially reduce exposure to lead dust, are available through laboratory safety and supply catalogs and vendors.

Copies of 29 CFR Part 1926, Lead Exposure in Construction: Interim Final Rule, are available from the Department of Labor, Occupational Safety and Health Administration, or may be found in any library with a current edition of the Code of Federal Regulation (CFR).

Further Reading

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Glossary of Terms

Deteriorated Lead-Based Paint: Paint known to contain lead that shows signs of peeling, chipping, chalking, blistering, alligating or otherwise separating from its substrate.

Dust Removal: The process of removing dust to avoid creating a greater problem of spreading lead particles; usually through wet or damp collection or through the use of special HEPA vacuums.

Hazard Abatement: Long-term measures to remove the hazards of lead-based paint through selective paint stripping of deteriorated areas; or, in some cases, replacement of deteriorated features.

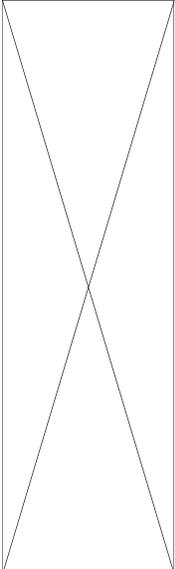
Hazard Control: Measures to reduce lead hazards to make housing safe for young children. Can be accomplished with interim (short-term) or hazard abatement (long-term) controls.

Interim Control: Short-term methods to remove lead dust, stabilize deteriorating surfaces, and repaint surfaces. Maintenance can ensure that housing remains lead-safe.

Lead-based Paint: Any existing paint, varnish, shellac or other coating that is in excess of 1.0 mg/cm² as measured by an XRF detector or greater than 0.5% by weight from laboratory analysis (5,000 ppm, 5,000 *ug/g*, or 5,000 mg/kg). For new products, the Consumer Safety Act notes 0.06% as the maximum amount of lead allowed in paint.

Lead-safe: The act of making a property safe from contamination by lead-based paint, lead-dust, and lead in soil generally through short and long-term methods to remove it, or to isolate it from small children.

Risk Assessment: An on-site investigation to determine the presence and condition of lead-based paint, including limited test samples, and an evaluation of the age, condition, housekeeping practices, and uses of a residence.

REMOVAL METHOD	IMPACT ON MATERIALS	LEAD DUST GENERATED	IMPACT ON WORKER	IMPACT ON ENVIRONMENT
				
Wet scraping; wet sanding;	Low: Gentle to substrate; feather edges to obtain smooth paint surface	Low: misting surfaces reduces lead dust	Low: No special protection for respiration, but wash before eating, drinking, etc.	Low-medium: Debris often general waste; check disposal requirements
Heat gun; paint removal w/ scrapers < 450oF	Low: Gentle to substrate	Medium: flicking softened paint does create airborne lead dust	Medium: Respirator w/HEPA filters usually required	Medium: Lead-paint sludge is hazardous waste
Chemical stripping on-site; use liquid or poultice; avoid methylene chloride	Low to Medium: Avoid damage to wood texture/grain with long dwell time	Low: Chemicals are moist and reduce lead dust	Low: For lead dust; for volatile chemicals may require solvent filter mask	Medium: Lead residue hazardous; off/rinse must be filtered or contained
Controlled HEPA sanding; primarily for wooden surfaces; sander uses HEPA vacuum shroud	Low to Medium: Avoid gouging wooden surfaces; good for feathering edges	Medium to High: Worker must know how to use equipment	Medium to High: Requires respirator with HEPA filter and possibly containment of area	Medium to High: Paint debris is hazardous and must be contained in drums for disposal

