



INTERNATIONAL
CODE COUNCIL®

PUBLIC CODE CHANGE PROPOSAL FORM FOR PUBLIC PROPOSALS IN THE INTERNATIONAL CODES

2007/2008 CODE DEVELOPMENT CYCLE

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Jurisdiction/Company: Alliance for Healthy Homes
Submitted on Behalf of: Alliance for Healthy Homes and National Center for Healthy Housing

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2) **Copyright Release:** If you have previously executed the copyright release, please check the box below:
 2007/2008 Cycle copyright release on file (faxed August 15, 2007)

3) **International Code(s) associated with this Public Proposal:** IPMC

CODE CHANGE PROPOSAL

Code Sections/Tables/Figures Proposed for Revision (3.3.2):
304.2

Name/Company/Representing (3.3.1):
Jane Malone for the Alliance for Healthy Homes and National Center for Healthy Housing

Proposal:
Revise as follows

304.2 Protective treatment. All exterior surfaces, including but not limited to, doors, door and window frames, cornices, porches, trim, balconies, decks and fences shall be maintained in good condition. Exterior wood surfaces, other than decay-resistant woods, shall be protected from the elements and decay by painting or other protective covering or treatment. Peeling, flaking and chipped paint shall be eliminated and surfaces repainted. All siding and masonry joints as well as those between the building envelope and the perimeter of windows, doors, and skylights shall be maintained weather resistant and water tight. All metal surfaces subject to rust or corrosion shall be coated to inhibit such rust and corrosion and all surfaces with rust or corrosion shall be stabilized and coated to inhibit future rust and corrosion. Oxidation stains shall be removed from exterior surfaces. Surfaces designed for stabilization by oxidation are exempt from this requirement.

304.2.1 Lead-Based Paint. Deteriorated paint on the exterior of property built before 1978 shall be repaired using approved lead-safe work practices, unless documentation exists that the paint does not contain lead. The following repair methods shall not be used on painted surfaces: open flame burning or torching; machine sanding, machine grinding, abrasive blasting or sandblasting without a high-efficiency particulate air (HEPA) local exhaust control; heat guns operating above 1100 degrees Fahrenheit or charring the paint; dry sanding; dry scraping except in conjunction with heat guns or within 1.0 ft. of electrical outlets or when treating defective paint totaling no more than 10 sq. ft. on any one interior surface; and paint stripping using a solvent that contains methylene chloride without enclosure.

EXCEPTIONS (to 304.2.1):

1. Property built after lead-based paint was banned
2. Painted surfaces proven to contain no lead-based paint

Supporting Information (3.3.4 & 3.4):

The purpose of this proposed addition to Code requirements for the surfaces of the exterior structure is to incorporate measures that reflect current knowledge about managing lead-based paint and thereby prevent lead poisoning. These changes would require, only in properties likely to contain lead-based paint, safe repair of deteriorated paint that is likely to contain lead. Multiple studies have demonstrated that lead dust, which is caused by deteriorated lead-based paint and some methods of paint repair, is the major source of lead exposure for young children. The dangers associated with exposure to lead-based paint hazards are well-known: lead is associated with a range of serious health effects on children, including detrimental effects on cognitive and behavioral development with serious personal and social consequences that may persist throughout their lifetime. More than 36 million pre-1978 US housing units contain lead-based paint.

The current Code fails to specifically require, in older properties that are likely to contain lead-based paint, the use of

precautionary practices in order to prevent the dispersal of lead before, during, and after the repair work, in the course of complying with subsection 304.2's requirement to repair peeling, flaking, and chipped paint. The proposal improves the current Code by adding a health-protective requirement to perform the repair safely around lead-based paint. The addition of the proposed sub-subsection will protect children from lead poisoning by specifying the use of approved lead safe work practices in making the required repairs and prohibiting extremely dangerous methods of paint repair. "Approved" lead-safe work practices may include established methods promulgated by federal agencies and standards bodies.

The proposed new sub-sub-section contains two exceptions to the requirement: properties built after lead was banned from paint used in residential properties (1977 US; earlier in some US cities; 1909 France, Belgium, Austria), and where the deteriorated paint has been documented to not contain lead (such as by a lead-based paint inspection or risk assessment, or through completion of another government-approved test method or ANSI standard).

Referenced Standards (3.4 & 3.6):

Cost Impact (3.3.4.6):

The code change proposal will increase the cost of property maintenance.