



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

<b>Code Sections/Tables/Figures Proposed for Revision (3.3.2):</b> 305.3
<b>Name/Company/Representing (3.3.1):</b> Jane Malone for the Alliance for Healthy Homes and National Center for Healthy Housing
<b>Proposal:</b> Revise as follows  <b>305.3 Interior surfaces.</b> All interior surfaces, including windows and doors, shall be maintained in good, clean and sanitary condition. Peeling, chipping, flaking or abraded paint shall be repaired, removed or covered. Cracked or loose plaster, decayed wood and other defective conditions shall be corrected. <u>If moisture is the cause of paint deterioration or other defective surface conditions, the cause of the moisture shall be corrected.</u>  <b>305.3.1 Lead-Based Paint.</b> <u>Deteriorated paint in 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 2 sq. ft. in any one interior room or space; and paint stripping using a solvent that contains methylene chloride without powered mechanical ventilation.</u> <b>EXCEPTIONS (to 305.3.1):</b> 1. <u>Property built after lead-based paint was banned</u> 2. <u>Painted surfaces proven to contain no lead-based paint</u>
<b>Supporting Information (3.3.4 &amp; 3.4):</b>  The purpose of this proposed addition to Code requirements for the surfaces of the interior structure is to incorporate measures that reflect current knowledge about managing lead-based paint and excessive moisture and thereby prevent lead poisoning and mold. These changes would require the correction of underlying moisture problems in all properties, and, 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 is inadequate by failing to specifically require correction of surface evidence of a moisture problem. The first change requires repair of underlying moisture problem: "If moisture is the cause of paint deterioration or other defective surface conditions, the cause of the moisture shall be corrected." The result of this requirement will be prevention of paint deterioration, which is hazardous in older property that may contain lead-based paint, as well as the cessation of moisture

problems in wall coverings and other building materials that can lead to mold, infestation, and structural problems in any property.

305.3.1. 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 305.3's requirement to repair peeling, chipping, flaking or abraded paint. The proposal improves the current Code by adding a health-protective requirement to perform the repair safely around lead-based paint, a subject currently acknowledged in the Commentary but not in the Code. 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.