

US EPA ARCHIVE DOCUMENT

July 21, 2000

Art Strauss  
187 Acton Road  
Columbus, Oh 43214-3303

Dear Mr. Strauss:

I want to thank you for your comments in your letter of July 17 and our subsequent phone conversation of July 20. You raise several good points that deserve discussion and consideration.

One example is your comment about using lead-poisoned children as “miner’s canaries” to identify houses with lead hazards. I agree that this would be a flawed and totally reactive approach, *if that were the sole focus of the program*. However, under our current joint program with the Department of Trade and Development, we do recruit owners of low-income housing and provide grants for lead abatement. Under the XL proposal, we would do targeted outreach to identify more of those properties. We will also provide training in preventive maintenance to property owners, residents and maintenance crews in ways to maintain their properties that will prevent lead hazards from occurring.

You also suggest that the City “make a building code change which would prohibit lead paint in and on any housing structure”, and then invest the resources necessary to completely abate all houses with lead paint in five years. Unfortunately, such a massive abatement is not possible. According to the 1990 Census, an estimated 102,313 housing units were constructed prior to 1978. Nationally, seventy-five percent (75%) of those houses have some lead paint. If we assume an average of \$10,000 per abatement (a very conservative estimate), we would need \$750,000,000 in abatement funds alone to complete the work.

Moreover, it is not at all clear that such wholesale abatement is necessary. Bear in mind that intact lead paint is *not a hazard*. Our approach is to identify those properties with deteriorated lead paint surfaces that constitute hazards to their residents. Once identified, we work with the owner and residents to eliminate those *hazards* and prevent them from occurring in the future. Of the 116,832 housing units in the central city, the Department of Trade and Development estimates that 14,503 (12%) are substandard units i.e. not meeting City housing code standards. If we can have a positive effect on those units through both investigating housing of lead-poisoned children, *and proactively recruiting*

*and training property owners*, we can take major steps towards eliminating lead poisoning.

I agree that a City Code change would be helpful. We intend to propose one establishing clear legal responsibilities for property owners to correct lead hazards where they are identified, and maintain their properties so as to prevent hazards from occurring.

Again, I want to thank you for your participation in this process. The input and support of concerned and informed citizens such as you will be invaluable to us in our future efforts to combat childhood lead poisoning.

Sincerely,

Gary Garver, Director  
Childhood Lead Poisoning  
Prevention Program