



Designation: E2252 – 22

# Standard Practice for Selection of Lead Hazard Reduction Methods for Identified Risks in Residential Housing or Child Occupied Facilities<sup>1</sup>

This standard is issued under the fixed designation E2252; the number immediately following the designation indicates the year of original adoption or, in the case of revision, the year of last revision. A number in parentheses indicates the year of last reapproval. A superscript epsilon ( $\epsilon$ ) indicates an editorial change since the last revision or reapproval.

## 1. Scope

1.1 This practice describes the selection of lead hazard reduction methods for controlling lead hazard risks identified during risk assessments of residential dwellings and child occupied facilities.

1.2 The values stated in SI units are to be regarded as standard. The values given in parentheses are mathematical conversions to inch-pound units that are provided for information only and are not considered standard.

1.3 This practice contains notes, which are explanatory and are not part of the mandatory requirements of this standard.

1.4 *Methods described in this practice may not meet or be allowed by requirements or regulations established by local authorities having jurisdiction. It is the responsibility of the user of this standard to comply with all such requirements and regulations.*

1.5 *This standard does not purport to address all of the safety concerns, if any, associated with its use. It is the responsibility of the user of this standard to establish appropriate safety, health, and environmental practices and determine the applicability of regulatory limitations prior to use.*

1.6 *This international standard was developed in accordance with internationally recognized principles on standardization established in the Decision on Principles for the Development of International Standards, Guides and Recommendations issued by the World Trade Organization Technical Barriers to Trade (TBT) Committee.*

## 2. Referenced Documents

### 2.1 ASTM Standards:<sup>2</sup>

[D1356 Terminology Relating to Sampling and Analysis of Atmospheres](#)

<sup>1</sup> This practice is under the jurisdiction of ASTM Committee D22 on Air Quality and is the direct responsibility of Subcommittee D22.12 on Sampling and Analysis of Lead for Exposure and Risk Assessment.

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<sup>2</sup> For referenced ASTM standards, visit the ASTM website, [www.astm.org](http://www.astm.org), or contact ASTM Customer Service at [service@astm.org](mailto:service@astm.org). For *Annual Book of ASTM Standards* volume information, refer to the standard's Document Summary page on the ASTM website.

[E917 Practice for Measuring Life-Cycle Costs of Buildings and Building Systems](#)

[E1605 Terminology Relating to Lead in Buildings](#)

[E1795 Specification for Non-Reinforced Liquid Coating Encapsulation Products for Leaded Paint in Buildings](#)

[E1796 Guide for Selection and Use of Liquid Coating Encapsulation Products for Leaded Paint in Buildings](#)

[E1797 Specification for Reinforced Liquid Coating Encapsulation Products for Leaded Paint in Buildings](#)

[E2052 Guide for Evaluation, Management, and Control of Lead Hazards in Facilities \(Withdrawn 2008\)<sup>3</sup>](#)

[E2115 Guide for Conducting Lead Hazard Assessments of Dwellings and of Other Child-Occupied Facilities](#)

[E2239 Practice for Record Keeping and Record Preservation for Lead Hazard Activities](#)

### 2.2 HUD Documents:<sup>4</sup>

[HUD Guidelines Guidelines for the Evaluation and Control of Lead-Based Paint Hazards in Housing](#)

[24 CFR Part 35 Requirements for Notification, Evaluation and Reduction of Lead-Based Paint Hazards in Federally Owned Residential Property, and Housing Receiving Federal Assistance; Final Rule, September 15, 1999](#)

### 2.3 EPA Documents:<sup>5</sup>

[Renovate Right: Important Lead Hazard Information for Families, Child Care Providers, and Schools](#)

[40 CFR Part 745 Subpart L, Lead-Based Paint Activities](#)

### 2.4 NIBS Document:<sup>6</sup>

[NIBS Guidelines Lead-Based Paint: Operations and Maintenance Work Practices Manual for Homes and Buildings](#)

### 2.5 RSMeans Document:<sup>7</sup>

[Building Construction Cost Data](#)

<sup>3</sup> The last approved version of this historical standard is referenced on [www.astm.org](http://www.astm.org).

<sup>4</sup> Available from U.S. Department of Housing and Urban Development (HUD), 451 7th Street S.W., Washington, DC 20410, <http://www.hud.gov>.

<sup>5</sup> Available from United States Environmental Protection Agency (EPA), William Jefferson Clinton Bldg., Federal Triangle Complex, 1200 Pennsylvania Ave., NW, Washington, DC 20004, <http://www.epa.gov/lead>.

<sup>6</sup> Available from National Institute of Building Sciences (NIBS), 1090 Vermont Avenue, NW, Suite 700, Washington, DC 20005, <http://www.nibs.org>.

<sup>7</sup> Available from RSMeans data from Gordian, 1099 Hingham St., Ste. 201, Rockland, MA 02370, <http://www.rsmeans.com>.

### 3. Terminology

3.1 *Definitions*—For definitions of terms used in this practice, refer to Terminologies **D1356** and **E1605**.

### 4. Significance and Use

4.1 This practice outlines lead hazard reduction methods that have been shown to be effective in preventing lead poisoning in children.

4.2 This practice tabulates advantages, disadvantages, and relative costs of the reduction methods to assist professionals such as certified lead-based paint risk assessors, supervisors, or project designers in selecting appropriate cost-effective options for controlling lead hazards identified during a lead risk assessment. Different control methods may be equally effective in controlling a given lead hazard and, consequently, the selection of a specific control method may depend on the needs and economic constraints of the client or building owner.

4.3 This practice is intended to complement other lead hazard activities that are performed in accordance with regulations promulgated by authorities having jurisdiction. For example, in some jurisdictions, a lead hazard risk assessment, by regulation, consists of a visual assessment, a hazard assessment including environmental monitoring for lead, and selection of lead hazard reduction methods.

4.4 This practice is intended to assist homeowners, owners and occupants of rental property, lenders, insurers, and others who have interest in selecting options for controlling lead hazards associated with leaded paint, dust, or soil.

4.5 This practice complements Guide **E2115**. Information and data gathered in accordance with Guide **E2115** and this practice are used in preparing a risk assessment report. Subsequent lead hazards are mitigated through implementation of controls selected in accordance with this present practice.

4.6 This practice addresses the most commonly used lead hazard reduction methods. It is left to users of this practice to identify the advantages, disadvantages, and relative costs associated with emerging control technologies for comparison with these characteristics of established lead hazard control methods.

4.7 This practice does not address specific historic preservation requirements. The interim control and abatement methods in this practice will work in any structure; however, historic preservation regulations promulgated by authorities having jurisdiction may impose specific interim control or abatement methods.

### 5. Training and Experience Requirements

5.1 Selection of appropriate lead hazard reduction methods performed in response to risk assessments shall be carried out by certified or licensed risk assessors, supervisors, workers, or project designers as required under regulations promulgated by authorities having jurisdiction. Users of lead hazard control services should review the credentials and experience of all involved to regulations promulgated by authorities having jurisdiction to determine whether each is qualified to conduct the work.

5.1.1 Refer to Guide **E2052** and to regulations promulgated by authorities having jurisdiction (see **Appendix X1**) regarding training and experience of risk assessors, supervisors and project designers.

5.2 The selection of lead hazard reduction methods shall take into consideration the qualifications and experience of persons such as contractors or in-house maintenance personnel who will implement the selected procedures. These persons should be trained regarding the hazards of lead and the proper use of lead hazard reduction methods as required through certification or licensure promulgated by authorities having jurisdiction.

5.2.1 Refer to Guide **E2052** and to regulations promulgated by authorities having jurisdiction (see **Appendix X1**) for additional information regarding training and experience for workers and supervisors, and for information regarding work practice standards and interim controls.

### 6. Lead Hazard Reduction Methods

6.1 *General*—There are two approaches to reducing lead hazards: interim control and abatement. Most often, a combination of the two approaches will be utilized to maximize the effectiveness of hazard management balanced with the cost to be incurred.

6.2 *Occupant and Owner Education*—All lead hazard reduction strategies shall include a component on occupant and owner education of lead hazards. In addition, the individual responsible for the lead hazard reduction shall inform owners that, when a property has been identified as containing lead hazards or lead-based paint, they shall disclose this information upon the sale, lease, or rental of the property.

NOTE 1—A document considered to be universally informative for occupant and owner education is the EPA/HUD/CPSC pamphlet entitled *Renovate Right: Important Lead Hazard Information for Families, Child Care Providers, and Schools*. <https://www.epa.gov/lead/790613/astm-e2252-22>

6.2.1 Refer to Guide **E2052** for elements of an occupant education program.

### 7. Interim Controls

7.1 Interim controls are designed to reduce the exposure to lead through procedures that require ongoing maintenance. They are almost always an option in every lead hazard reduction situation; however, if interim controls cannot control a lead hazard, abatement (see Section 8) will be the only option. The main question that the owner needs to answer is: Are resources, staff, equipment, priority and schedule adherence, budget, and willingness to manage an interim lead hazard control program available over the long term?

7.2 The following are key elements of interim controls:

NOTE 2—Refer to Guide **E2052** for developing interim controls.

7.2.1 Educate occupants and owners regarding lead hazards (see 6.2).

7.2.2 Train maintenance personnel concerning the proper maintenance, cleaning, and surface protection requirements to maintain a safe lead-hazard-free environment (see 5.2).

7.2.3 Conduct periodic visual inspections of coated surfaces by qualified personnel to assess paint integrity.

7.2.4 Develop a work permit system to ensure that both in-house personnel and contractors are made aware of surfaces containing lead-based paint.

7.2.5 Perform proper clearance procedures for each interim control treatment.

7.2.6 Perform record keeping of all interim control actions, including but not limited to notification, inspections, actions, and clearance.

7.2.7 Use lead safe work practices (see HUD Guidelines) to protect the occupant, workers, and environment while performing interim control actions.

7.2.8 Perform all work with properly trained and certified personnel in accordance regulations promulgated by authorities having jurisdiction.

7.3 The following are standard practices of interim control that may be selected for lead-based paint, lead in dust and lead in soil. **Table 1** lists the advantages and disadvantages of using interim controls. See also 24 CFR Part 35.

7.3.1 *Paint Stabilization*—Repair of deteriorated paint through coating repair methods (for example, application of primers, paints, stains, varnishes, shellacs, lacquers, and other coatings). This process is called paint stabilization. Paint stabilization means repairing any physical defect in the substrate of a painted surface that is causing paint deterioration, removing loose paint and other material from the surface to be treated, and applying a new protective coating of primer or paint, or both.

7.3.2 *Smooth and Cleanable Horizontal Surfaces*—All horizontal surfaces that are rough, pitted, or porous shall be covered with a smooth, cleanable covering or coating, such as metal coil stock, plastic, polyurethane, desk or concrete floor sealants, vinyl floor tile, or linoleum.

7.3.3 *Correcting Dust-generating Conditions*—Conditions causing friction or impact of painted surfaces shall be corrected. This may be performed by rehanging doors or planing doors so that doors do not rub against door frames, “spot stripping” contact points and coating with durable primers and paints containing bittering agents, installing window channel guides that reduce or eliminate abrasion of painted surfaces, or by protecting paint on stair treads, risers, stringers, and floors with a durable covering such as carpeting, tile, or sheet flooring. Other friction surfaces include handrails and loose door hinges. In the case of impact surfaces, include treatments

that eliminate impact with the painted surface, such as door bumper stops, and corner and shoe moldings.

7.3.4 *Bare Residential Soil*—Interim control options for lead in soil include mulching over landscape fabric, seeding, sodding, planting obtrusive shrubbery, and fencing or barricading the area from entry by individuals, especially children. The important factor is to determine the best approach for eliminating lead exposure to humans from bare soil areas. It is critical to ensure that bare soil and the subsequent treatment is not subject to erosion.

7.4 Documentation for all interim control actions shall be maintained by the owner or owner’s designee.

**8. Abatement**

8.1 Abatement is any measure or set of measures designed to permanently eliminate lead-based paint hazards. Abatement includes:

- 8.1.1 Removal of lead-based paint and lead-containing dust,
- 8.1.2 Application of an encapsulant or installation of a permanent enclosure,
- 8.1.3 Replacement of components or fixtures coated with lead-based paint, and
- 8.1.4 Removal or covering of lead-contaminated soil.

8.2 *Lead-Based Paint*—There are four general methods for abatement of lead-based paint hazards: encapsulation, enclosure, replacement and (paint) removal. If encapsulation, or enclosure, or both are used as a hazard reduction option, the lead-based paint remains in place. In these cases, the encapsulated or enclosed areas shall be periodically inspected as part of the lead hazard control program. An overview of the advantages and disadvantages of typical abatement methods for lead-based paint are contained within the tables listed below and discussed in the paragraphs that follow.

- Table 2** Advantages and Disadvantages of Lead Abatement by Encapsulation
- Table 3** Advantages and Disadvantages of Lead Abatement by Enclosure
- Table 4** Advantages and Disadvantages of Lead Abatement by Component Replacement
- Table 5** Advantages and Disadvantages of Lead Removal by Chemical Strippers
- Table 6** Advantages and Disadvantages of Lead Removal by Sanding and Grinding
- Table 7** Advantages and Disadvantages of Lead Removal by Hand-Scraping After Softening With a Heat Gun

**TABLE 1 Advantages and Disadvantages of using Interim Controls**

Advantages	Disadvantages
Generally a quick process to repair hazards. Uses commercially available products. Is cost effective in the short term. Products and labor are lower in cost. Re-occupancy is quicker, and often residents can remain in the structure during conduct of the process. Training is easier and sometimes does not require certification.	Lead-based paint still remains. Requires periodic inspections according to an established schedule to ensure that the interim control remains effective. May not be a long term cost-effective solution as in some cases the cost of perpetual interim controls exceeds the cost of abatement. Will not work on severely damaged substrates. Some authorities having jurisdiction require that supervisors and workers take an approved lead safe work practices course. Some authorities having jurisdiction require firm and worker certifications such as for renovation, remodeling, and painting activities. Not appropriate in high wear areas where deterioration will likely recur. Repairs may create lead contaminated dust which requires containment and thorough cleanup.

8.2.1 *Encapsulation* (see **Table 2**). Encapsulation is the application of a covering or coating that acts as a barrier between the lead-based paint and the environment. Guidance for selection and use of encapsulants is given in Guide **E1796**. Preliminary testing of the lead-based paint and substrate shall be performed by the individual responsible for the lead hazard reduction program to ensure that the encapsulant will adhere to the surface and that the existing paint or substrate will not fail and cause exposure to lead-based paint. Care must be taken to ensure that the surface is prepared according to the encapsulation material manufacturer’s specification. Patch testing before application and quality control checks of wet film thickness is highly recommended for this strategy to demonstrate encapsulant compatibility to and with the existing substrate and coating system.

8.2.1.1 The individual responsible for recommending the encapsulant shall document its location(s) and arrange for its periodic inspection. This periodic inspection shall include checking the substrates where the encapsulant has been applied.

8.2.1.2 Apply encapsulants in accordance with the manufacturer’s requirements or in accordance with regulations promulgated by authorities having jurisdiction, or both.

8.2.1.3 Use only encapsulants for which the manufacturer provides at least a 20-year warranty.

8.2.1.4 Since the lead-based paint remains, care must be taken to prevent damage to the encapsulant barrier that results in exposure of the underlying lead-based paint.

8.2.1.5 *Encapsulation of Surfaces without Reinforcement*—Encapsulants without reinforcements are easy to apply and may immediately improve the aesthetic appeal of the substrate (and housing unit). Only apply non-reinforced encapsulants that are in conformance with Specification **E1795**. In applying non-reinforced encapsulants, it is important to repair surface imperfections such as cracks, holes, and chips.

8.2.1.6 *Encapsulation of Surfaces with Reinforcement*—Encapsulation of surfaces can also be performed using a reinforcement system. This reinforcement may be a fiberglass mesh that is mechanically fastened to the substrate. The encapsulant is then applied over the mesh in several applications until the mesh detail disappears. Only apply reinforced

encapsulants that are in conformance with Specification **E1797**. This method does not require repair of hairline cracks and small holes in the substrate prior to the application of the system.

8.2.2 *Enclosure* (see **Table 3**). An enclosure is a rigid, durable, construction material that is mechanically fastened to a substrate to act as a dust-tight barrier between the lead hazard and the environment. The construction of an enclosure requires a sealing of all edges to ensure that leaded dust is not released into the environment. In addition, adhesives and mechanical fasteners are generally used throughout the enclosure system to prevent a “billowing” effect. Cautionary lead labeling or stenciling should be applied between the substrate and the enclosure system. The use of enclosures may require the use of additional trim, particularly at baseboards, windows and doors. The following apply to typical enclosure systems.

8.2.2.1 The individual responsible for recommending the enclosure shall document its location(s) and arrange for its periodic inspection.

8.2.2.2 Construct the enclosure in accordance with the manufacturer’s requirements or in accordance with regulations promulgated by authorities having jurisdiction, or both.

8.2.2.3 Since the lead hazard remains, care must be taken to prevent the unauthorized removal of the enclosure system.

8.2.2.4 *Enclosure with Gypsum Board*—Gypsum board is a common enclosure material used on interior walls and ceilings. Mechanical fasteners (that is, nails or screws) in conjunction with adhesives are required to ensure that a secure, long-lasting, dust-tight enclosure is obtained. If gypsum board is used on the exterior of the structure, it must be rated for such application.

8.2.2.5 *Enclosure with Paneling*—Enclosure with paneling generally involves using pre-finished plywood or fiberboard paneling that is attached with mechanical fasteners and bonded to the existing surface or framing by the application of an adhesive.

8.2.2.6 *Enclosure with Plywood or Luan*—Plywood or luan (also known as lauan and luan plywood) can be used to enclose floor and stair systems as an underlayment over the painted surface to provide a smooth base for carpet, tile or sheet flooring, and other types of finish flooring.

**TABLE 2 Advantages and Disadvantages of Abatement by Encapsulation**

Advantages	Disadvantages
<p>The process is generally quick and easy.</p> <p>If surface preparation is minimal, the amount of hazardous waste generated is generally small.</p> <p>Only a limited amount of capital equipment is required.</p> <p>Worker protection requirements are minimal (for example, half-face respirators are generally required during surface preparation).</p> <p>A wide variety of encapsulants are available for interior or exterior application, or both.</p> <p>Often no additional finish work is required.</p> <p>Encapsulants can be applied to almost any substrate type and material if preceded by proper surface preparation.</p> <p>Encapsulation works well on hard-to-reach areas.</p> <p>The method typically generates the lowest levels of airborne lead dust during abatement.</p>	<p>Encapsulants are not suitable for application on friction surfaces (for example, window tracks and door jams, high friction areas, and impact points).</p> <p>They do not permanently remove the lead.</p> <p>The encapsulant manufacturer may not warranty the product or application, or both, if the workers are not trained to the manufacturer’s requirements in the use of the manufacturer’s product.</p> <p>They generally cannot be applied during adverse environmental conditions (temperature, humidity, wind, etc.).</p> <p>Their long-term effectiveness is unknown and under study.</p> <p>Bonding of encapsulants to leaded surface is sometimes poor.</p> <p>Pilot testing or quality control checks, or both, of the encapsulant on the given substrate is often required.</p> <p>Periodic monitoring by trained personnel according to a set schedule and procedure is required after installation.</p> <p>Waste generated during installation, in many cases, proves to be hazardous.</p>

**TABLE 3 Advantages and Disadvantages of Abatement by Enclosure**

Advantages	Disadvantages
<p>Enclosures may enhance the overall appearance of room/unit.</p> <p>They normally generate little hazardous waste during installation.</p> <p>Enclosure materials are readily available.</p> <p>Enclosure installation generally does not create large amounts of leaded dust.</p> <p>Their installation may provide additional thermal insulation.</p> <p>They work particularly well on large, flat surfaces such as ceilings, floors, and walls.</p> <p>Installation is not necessarily weather dependent.</p>	<p>Lead is not removed.</p> <p>Their installation requires carpentry and finishing skills; they may also require the extension of electrical and other fixtures from original surfaces.</p> <p>Sealing of the enclosure is critical and should be carefully examined.</p> <p>Exterior enclosure systems should utilize a house wrap such as a polymeric vapor underlayment, with lead cautionary labeling.</p> <p>There is a potential for buckling and bowing if not properly installed.</p> <p>They can be difficult to install in some instances due to surface irregularities and poor integrity of the existing substrate. They may also conceal rotting wood.</p> <p>Enclosures are uniformly more expensive than encapsulating, (but they may be more durable than encapsulation).</p> <p>Their long term effectiveness is still under study.</p> <p>Often requires work area or unit resident relocation, or occupant protection measures, or both.</p> <p>Enclosures are typically not accepted on historical structures.</p> <p>Some waste generated during installation may be hazardous.</p> <p>Future renovations can result in exposure to surfaces with lead-based paint and create lead-based paint hazards.</p> <p>It is important to label surfaces that have lead-based paint before they are enclosed.</p>

**TABLE 4 Advantages and Disadvantages of Abatement by Component Replacement**

Advantages	Disadvantages
<p>Component replacement results in new, clean substrates and generally improves the quality of a unit.</p> <p>The method completely eliminates the lead hazard for the replaced component.</p> <p>New components (for example, windows) may result in energy savings.</p> <p>Component replacement can be used for almost all substrates.</p> <p>May increase property values through use of renovation-type upgrades and security measures.</p> <p>Overall, this is one of the best long-term and most widely applicable abatement methods.</p>	<p>Component replacement should not generally be used if architectural significance is required. (See 4.7.)</p> <p>Costs for replacement of like-type components can be high.</p> <p>Installation requires skilled tradespeople.</p> <p>Depending upon hazardous waste characterization analyses, components may require disposal as hazardous waste.<sup>4</sup></p> <p>When trim removal reveals an opening, large amounts of dust can be released.</p>

<sup>4</sup> Some authorities having jurisdiction permit the disposal of components in a Construction and Demolition (C&D) Landfill. This may lessen disposal costs and make this method more attractive from a cost standpoint. However, different authorities vary their approach to disposal and the user is cautioned to verify disposal requirements with all the jurisdictions where the work is being performed.

**TABLE 5 Advantages and Disadvantages of Removal by Chemical Strippers**

Advantages	Disadvantages
<p>Chemical strippers are effective on a wide variety of substrate types.</p> <p>Lead is removed permanently (except that lead embedded in the substrate may remain).</p> <p>Application is not difficult and training is moderate.</p> <p>Various products are readily available.</p> <p>Strippers leave the substrate visually clean when used properly.</p>	<p>Use is labor-intensive and requires time for compounds to react.</p> <p>Strippers do not work well at low temperatures.</p> <p>Use can be messy and clean up extensive; containment of strippers and accompanying neutralizing agents is essential.</p> <p>Use may cause lead to migrate into the substrate.</p> <p>Worker protection against stripper exposure is important; eye and dermal personal protection is mandatory.</p> <p>Strippers do not work well on plaster or gypsum board substrates.</p> <p>Waste generated is most likely hazardous.</p> <p>There is large potential for damage to materials and components adjacent to those being stripped while in place. Collateral damage control measures need to be utilized to prevent such damage.</p> <p>Use may require several applications to be completely effective.</p> <p>Stripper application can damage substrates if not used properly by experienced personnel.</p> <p>Costs are consistently higher than the costs of removing lead-based paint by hand-scraping or component replacement methods.</p> <p>On wood surfaces, the grain may be raised by the chemical stripper or by the cleaning agent. The surface would have to be sanded, potentially creating leaded dust, before it can be repainted.</p> <p>Damage could occur to the component hardware and glazing.</p>

8.2.2.7 *Enclosure with Sheet Metal, Vinyl, Wood, or Similar Materials*—Enclosure systems of aluminum, vinyl, and wood are available prefabricated, or are fabricated on site. Typical uses include siding, soffits, fascias, window systems, and doorframes. In certain instances, some surface preparation must be undertaken to prevent deteriorated paint from being

released from the edges of the enclosure systems. Sometimes for exteriors, this can be accomplished by applying a synthetic fabric like a house wrap membrane to the substrate. Some window manufacturers have retrofit packages whereby sheet metal is wrapped around the existing window case and a new window is placed into the window opening. Sheet metal (or