$\frac{\textbf{Interim Remediation Guidance}}{\textbf{for Homes with Corrosion from Problem Drywall}}^{1}$

by the Consumer Product Safety Commission and the Department of Housing and Urban Development April 2, 2010

Introduction

This Interim Remediation Guidance summarizes what the Federal Interagency Task Force on Problem Drywall ("Task Force") believes is a sufficiently stringent approach for the remediation of houses affected by problem drywall, given the information now available. Initial studies found a strong association between the presence of problem drywall and corrosion of metal in homes. Based on those findings, the Task Force has developed this interim guidance that focuses on the replacement of problem drywall and building components for which drywall-induced corrosion might cause a safety problem.

This Interim Remediation Guidance is provided at this time and before the completion of all ongoing scientific studies of this matter, because the Task Force recognizes that many homeowners want to begin the process of repairing their homes. The Task Force recognizes that less extensive or costly remediation methods may have merit, but at present the Task Force lacks a scientific basis to evaluate those methods. This guidance is designed as a conservative, common sense approach to the challenges facing homeowners, and is offered in advance of a complete understanding of certain scientific matters at issue. The Task Force will continue its efforts to develop and refine procedures or standards related to the remediation of drywall homes and this guidance issued today will be modified as necessary.

Interim Remediation Guidance

This Interim Remediation Guidance for homes with problem drywall calls for the replacement of:

- 1. all possible problem drywall;
- 2. **all fire safety alarm devices** (including smoke alarms and carbon monoxide alarms);
- 3. all electrical components and wiring (including outlets, switches and circuit breakers); and
- 4. all gas service piping and fire suppression sprinkler systems.

All testing and remediation work should be conducted in compliance with applicable building codes, occupational safety and health standards, and environmental regulations.

Discussion

This Interim Remediation Guidance intends to address possible safety hazards related to corrosion in drywall homes by: (1) eliminating the source of the corrosion, the problem drywall, and (2) replacing building components for which drywall-induced corrosion might cause a safety problem, such as fire safety alarm devices, electrical components and wiring, gas service piping and fire suppression sprinkler systems.

As a threshold matter, before remediation, care should be taken to determine whether the house has problem drywall. The Task Force recently released Interim Guidance – Identification of Homes with Corrosion from Problem Drywall,² to assist in such determinations.

¹ This is a staff document, and has not been reviewed or approved by, and may not necessarily reflect the views of, the Commission or the Department.

Where a house has been identified as having problem drywall, the scientific and practical challenges to finding individual problem sheets of drywall remain. Until such challenges are overcome, this Interim Remediation Guidance calls for the general replacement of drywall in an identified home. If a portion of the drywall in a home can be reasonably identified not to be problem drywall, because it is known to have been installed prior to the relevant time period (i.e., before 2001) and there are no other corroborating conditions, as provided in the Task Force's interim guidance on identification, indicating that the drywall is problem drywall, one option is to leave that drywall in place.

Replacement of all fire safety alarm systems, electrical components and wiring, gas service piping and fire suppression sprinkler systems should address the metal components in the home at greatest risk of being affected by drywall-induced corrosion in a way that may affect the occupants' safety.

The Task Force is aware that some remediation efforts have included the replacement of copper water service plumbing, and HVAC (heating, ventilation and air conditioning) evaporator coils. Homeowners may seek to replace such items, but their replacement is not included in this interim guidance because of the absence of a direct connection to safety.

The Task Force recognizes that other remediation approaches could ultimately prove more cost-effective and/or less invasive, such as the preservation of insulated wiring, but additional study is required on such approaches. Ongoing CPSC studies on long-term corrosion, due later in 2010, should provide relevant scientific information.

Homeowners should recognize that homes can suffer from corrosion unrelated to drywall, and that such other corrosion problems may not be resolved by addressing the drywall.

Other Building Materials and Contents:

Underlying the Task Force's recommendations is its view that removal of the source material, *i.e.*, the problem drywall, will eliminate the cause of the corrosive environment. The Task Force does not have a scientific basis to believe that emissions from the problem drywall require replacement of nonproblem drywall, wood studs, flooring, cabinetry, or other household components and fixtures that may have been exposed to the drywall emissions.

The Task Force understands, however, that certain other building materials and contents could be affected or require replacement in the course of the practical construction or engineering steps required to undertake the remediation described in this interim guidance. The Task Force does not offer any view on the replacement of other affected metals, home electronics, or personal property.

Cleanup Following Remediation:

After the remediation, it is important to ensure that the home be cleaned to remove any visible drywall dust and debris.

The Task Force is aware that some parties who are remediating homes with problem drywall take certain actions aimed at cleaning the structure during remediation such as the use of HEPA (high efficiency particulate air) vacuums and the ventilation of the home for a period between removal and replacement of drywall. The Task Force does not have a scientific basis for evaluating the need for such steps, but

² www.cpsc.gov/info/drywall/interimidguidance012810.pdf, January 28, 2010.

homeowners should consider these options as they seek to make an informed decision in their particular situation.

Additional Issues:

The Task Force is aware that some parties offer remediation approaches other than the replacement of problem drywall and affected metal components. The Task Force does not have a scientific basis to provide an opinion or evaluation of such approaches.

Consumers should exercise caution in contracting for testing and remediation, and should be diligent in confirming the references, qualifications, and background of individuals and firms that offer such services.³ Consumers should request that individuals and firms that offer remediation strategies that differ significantly from this interim guidance explain those strategies to the consumer's satisfaction before the consumer's purchase of those services or products.

Continuing Development of this Guidance

Scientific investigations are moving as quickly as possible to understand the complex problems presented by the issue of problem drywall. The scientific work completed to date by the Federal Interagency Task Force has been essential to building the foundation for decision-making by homeowners and local, state and federal authorities.⁴ The investigation continues to expand our understanding of this issue – but the Task Force believes that current information is sufficient to provide this Interim Remediation Guidance for homes with corrosion from problem drywall.

More information on problem drywall is available at the Federal Drywall Information Center website, www.drywallresponse.gov.

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³ FTC Consumer Alert, "Defective Imported Drywall: Don't Get Nailed by Bogus Tests and Treatments," www.ftc.gov/bcp/edu/pubs/consumer/alerts/alt164.pdf, December 2009.

⁴ Reports and information regarding problem drywall can be found at <u>www.drywallresponse.gov</u>.