U.S. Army Center for Health Promotion and Preventive Medicine

Just the Facts

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Technical Guidance on Lead in Vinyl Miniblinds

USACHPPM
Readiness thru Health

- *Identification*
- *Prioritize*
- *Removal/Replacement*
- *Disposal*
- *Cleaning (short term solution)*

BACKGROUND

On June 25, 1996, the Consumer Product Safety Commission (CPSC) issued press release #96-150, entitled "CPSC Finds Lead Poisoning Hazard for Young Children in Imported Vinyl Miniblinds."

The CPSC release applies only to nonglossy vinyl plastic miniblinds imported from China, Taiwan, Mexico, and Indonesia. They are made with plastics containing lead, which is released when the plastic surfaces deteriorate from heat or sunlight.

The CPSC has not actually recalled any vinyl miniblind products; however, the CPSC recommends removing these miniblinds in housing where young children live. Complying with the CPSC recommendation is not only health-protective but practical, because of the relatively low cost of replacement products.

The Army's policy of providing a healthful living and working environment for soldiers, their families, and civilians includes controlling lead hazards from all sources, including miniblinds. Installation housing, environmental, safety, preventive medicine, legal and public affairs staff should cooperate in a lead hazard management team effort to identify, prioritize, remove, and dispose of these miniblinds, and to educate occupants on ways in which they can protect their families from lead exposure.

EDUCATE personnel. Inform personnel that lead-containing miniblinds do not constitute an immediate health threat, but are a health concern. Emphasize that the Army is concerned about the health and safety of children.

IDENTIFY lead containing miniblinds. Where possible, determine whether miniblinds are lead-containing:

- Inspect miniblinds to determine if they are plastic, and do not have a high-gloss finish. Metal and high-gloss finish plastic miniblinds are not included in the CPSC warning.

- Assume the miniblinds are lead-containing unless the supplier can confirm otherwise.

Home Depot has identified its "Jencraft" and "Joanna" brands as lead-containing, and is offering refunds or credit on returns. Home Depot expected to have reformulated products for sale as early as July 1996. Other suppliers may be able to identify brands and may be willing to exchange them. The CPSC release notes that many miniblinds have been sold without a brand name. The Window Covering Safety Council, an industry association, confirms that virtually all non-gloss vinyl miniblinds (which they define as having 1" wide slats) imported from the four countries named by CPSC contain lead.

U.S. Army Center for Health Promotion and Preventive Medicine
USACHPPM Lead Team - Industrial Hygiene Field Services Program
Aberdeen Proving Ground, MD 21010-5422
DSN 584-3118 or Commercial (410) 671-3118
email: ihfs@aeha1.apgea.army.mil

USACHPPM does not recommend the use of chemical spot test kits or XRF devices to determine if non-gloss miniblinds contain lead. If an installation considers it essential to determine whether their miniblinds contain lead, then contact USACHPPM for suggestions on sampling and analyses.

PRIORITIZE the removal of lead-containing miniblinds from facilities that currently house or are frequented by children under the age of 6 years and pregnant women. This includes family housing units, Family Child Care Homes (FCCHs), Child Development Centers (CDCs), and other nonresidential facilities where children may come into contact with miniblinds or the lead contaminated dust from deteriorated miniblinds. In addition, non-gloss miniblinds should be removed from facilities that may be occupied in the future by children under 6 years old and pregnant women.

CLEAN miniblinds only if necessary as a short term solution prior to removal. To minimize the possibility of disturbing and spreading dust, lead-containing miniblinds should not be cleaned in place. Provide suitable cleaners at the self-help store and advise occupants on proper cleaning methods and precautions.

REMOVE miniblinds while wearing disposable gloves and then place the miniblinds in thick tear-resistant 6mm plastic bags. Handle miniblinds as gently as possible to minimize disturbing any dust on their surfaces. Store the removed miniblinds in locations inaccessible to children prior to proper disposal of the miniblinds. Clean the window sills and floors below the windows, as described below, as soon as possible following removal. Installation personnel can be trained to remove the non-gloss miniblinds. Personnel involved in removal activities should wear protective clothing and equipment that fully covers the skin. If occupants remove miniblinds themselves, advise them of the potential hazard from spreading dust and how to protect themselves and their families, including proper removal and cleanup methods.

DISPOSE of miniblinds from residential housing (family housing areas and Bachelor Officer's Quarters) as general trash in a Subtitle D landfill or municipal incinerator in accordance with the Resource Conservation and Recovery Act (RCRA) household waste exclusion in 40 CFR 261.4(b). Dispose of miniblinds in small quantities as they are generated, however, rather than accumulating larger volumes to reduce the possibility of exceeding the CERCLA Reportable Quantity for lead (1 pound in a 24-hour period).

Since waste from non-residential structures is not exempt from RCRA, and since preliminary TCLP data indicate that the miniblinds contain leachable lead at levels that far exceed the hazardous waste (HW) regulatory limit, miniblinds removed from these structures should be disposed of as a HW. Because of this preliminary data, use generator knowledge to characterize this waste as hazardous instead of using expensive analytical tests.

Try to return any large volumes of unused miniblinds in storage to the manufacturer. Several companies have indicated that refunds and/or credit may be given for unused items. If the manufacturers will not accept the miniblinds, dispose of them. Have a representative TCLP test performed to determine whether there is leachable lead above the HW limit (unused miniblinds may not leach to the same extent as used blinds since they have not been exposed to light and heat). The USACHPPM may be requested to provide limited analytical support. Facilities independently performing TCLP on miniblinds are requested to furnish a copy of the results to the address on the front of this fact sheet or fax to DSN 584-5471/Commercial 410-671-5471. Questions relating to disposal may also be addressed to Mr. Michael Worsham, Army Environmental Center (AEC), DSN 584-7076. Ensure that disposal complies with all federal, state and local requirements.

REPLACE lead-containing miniblinds that are installed, do not install any lead-containing miniblinds, and cancel orders/ procurement actions that are requesting lead-containing miniblinds. Contact the supplier to exchange lead-containing miniblinds for lead-free ones. Replacement metal or reformulated plastic miniblinds are suitable replacements that may cost more.

DOCUMENT the installation's decisions and actions concerning vinyl miniblinds to protect against future liabilities.

Cleaning solutions should be prepared by manufacturer's instructions. Use either a high-phosphate detergent (at least 5% trisodium phosphate, TSP), or a nonphosphate cleaner that is formulated specifically for lead dust removal. The use of high-phosphate detergents is banned in some states. TSP is an eye and skin irritant and may damage some finishes. Wear disposable rubber or plastic gloves. Use three containers: one for fresh cleaning solution; one for used cleaning solution; and one for clear water rinse. Keep cleaning compounds and cleaning solutions out of the reach of small children. Wash hands thoroughly after cleaning.

This fact sheet is a cooperative effort among USACHPPM, the Office of the Assistant Chief of Staff for Installation Management (OACSIM) and AEC.