



CITY OF PHILADELPHIA

500 South Broad Street, Philadelphia, Pa. 19146
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Commissioner
WALTER J. LEAR, M.D.
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LEWIS D. POLK, M.D.
Deputy Commissioner
for Community Health Services

Environmental Health Services

October 23, 1969

Mr. James C. Roumas
Director of Health & Safety
Lead Industries Association, Inc.
292 Madison Avenue
New York, N. Y. 10017

Dear Jim:

I am happy to comment on our ordinance and regulations for the control of lead poisoning in children. As you are probably aware, our regulations were adopted in 1966 which was a culmination of many years of hard work in the documentation of the problem, of working with various community groups and selling the need for this type of legislation both to the community at large and also internally in the Department and other City agencies.

Since the ordinance and regulations were adopted in 1966, we have continued to enforce the removal provisions of the regulations with no additional budgetary appropriation for staff and resources. We have dealt with each case individually as it has been reported and investigated, and orders for the removal of lead paint have been issued. We have found that in 62% of the cases the orders were complied with without any further enforcement action. An additional 20% were complied with by use of court action in the old Magistrates Court system and which is now part of the current Municipal Court system. During the days of the Magistrates Court system, we had difficulty in cases involving out-of-town owners because City constables could not serve summonses outside the city. Currently all summonses are served by way of registered mail and, therefore, it does not make any difference where the owner of the property lives.

I would estimate that since the initiation of the enforcement of the regulations that more than 400 properties have been made safe through removal of lead paint from the surfaces. The most common procedure utilized happens to be by burning, even though we recognize that this is probably the most hazardous of the methods used. We do advise the owner of the hazards involved and the safety precautions he should take. We also advise him at the time we issue the order of the degree of the removal required which is according to the specifications of accessible surfaces.

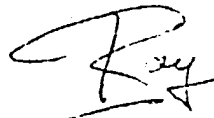
We have begun to implement the labelling portion of the ordinance that we reviewed paint labels of all companies who sell paint in Philadelphia, and where we felt the precautionary statement did not meet the standards of the regulations, we advised changes to be made. In a number of cases, these changes were made and complied with. In addition we had arranged with the Department of Licenses and Inspections to provide a copy of the regulations to each individual applying for a building permit so that they would be informed that lead paint can no longer be applied to interior surfaces of dwellings which are either occupied or used by children.

We are planning as soon as time will allow to implement the provision dealing with toys and furniture through surveys and spot checks as far as the hazard of lead paint is concerned.

I believe that our regulations and ordinance have been effective. We have had difficulty in dealing with those cases which could not be clearly diagnosed as lead poisoning although there was evidence of increased absorption of lead. I hope that with added budgetary provisions we could initiate a preventive program some time soon.

I appreciate your interest and the support which your organization has given us in the past and look forward to working with you in the future.

Sincerely yours,



Raymond L. Tyler, R.S., Chief,
Accident Control Section

RLT:tsr