

SUMMARY OF REVISION 1 TO THE INTERIM GUIDANCE – IDENTIFICATION OF HOMES WITH CORROSION FROM PROBLEM DRYWALL, AUGUST 27, 2010.

In its continuing efforts to provide accurate and helpful information, the Federal Interagency Task Force on Problem Drywall¹ believes it is appropriate to revise the Interim Guidance – Identification of Homes with Corrosion from Problem Drywall, January 28, 2010,² to reflect the additional work completed by the Consumer Product Safety Commission and its contractor Environmental Health & Engineering (EH&E) in its report Identification of Problematic Drywall: Source Markers and Detection Methods, May 28, 2010.³

Although the Federal Interagency Task Force's study of the elemental and chemical composition of 17 drywall samples has previously shown higher concentrations of elemental sulfur and strontium in Chinese drywall than in non-Chinese drywall, the Task Force now believes that the best and preferred practice for identifying the presence of Chinese drywall in a home does not include the use of strontium as one of the corroborative factors previously set forth by the Task Force. The Task Force is now removing from the "Step 2" list of corroborating evidence in the Interim Guidance the factor addressing strontium levels in excess of 1200 ppb. The Task Force does not believe strontium has a causative role in the problems reported with the problematic drywall. Furthermore, the Task Force believes it is appropriate to remove the strontium level as a corroborative factor due to the possibility that its use may lead to false-positive results where a homeowner may mistakenly believe their home contains problem drywall. The Task Force believes that the remaining factors, coupled with the new information and methodologies provided in the May 28, 2010 report, provide adequate options and assurance that a home may be correctly identified as containing problematic drywall.

The Task Force does feel it is important to note that the screening for strontium with specially-calibrated x-ray fluorescence analyzers may still be a cost-effective and efficient manner in which to *preliminarily* identify areas of a home possibly affected by problem drywall for further testing such as for elemental sulfur in those areas. The Task Force emphasizes, however, that such identification of strontium does not necessarily indicate the presence of problem drywall, rather only that additional testing in those areas may be advised.

The Task Force believes that the May 28, 2010 report has shown the use of elemental (orthorhombic) sulfur to be the marker most directly correlated with the reports of problem drywall in a home. Although the results of such testing are not as quickly available as the strontium screening, testing for elemental sulfur is commercially available and is a more accurate method which provides greater assurances to interested parties. The other methods to corroborate the presence of problem drywall described in the original Interim Guidance – Identification of Homes with Corrosion from Problem Drywall, January 28, 2010 remain unchanged.

¹ All references to the Federal Interagency Task Force on Problem Drywall in this document refer to the staff of the U.S. Consumer Product Safety Commission (CPSC) and the U.S. Department of Housing and Urban Development (HUD). 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.

² <http://www.cpsc.gov/info/drywall/interimidguidance012810.pdf>.

³ <http://www.cpsc.gov/library/foia/foia10/os/EHESourceMarkers.pdf>.

Interim Guidance – Identification of Homes with Corrosion from Problem Drywall – Revision 1
by the Consumer Product Safety Commission
and the Department of Housing and Urban Development ⁴

August 27, 2010

Executive Summary

The preliminary identification guidance has been revised to reflect a change in the understanding of the usefulness of strontium as a marker to confirm the presence of problem drywall. The revision relies upon the draft report prepared by CPSC’s contractor Environmental Health and Engineering (EH&E) on Identification of Problematic Drywall: Source Markers and Detection Methods, May 28, 2010, available at www.DrywallResponse.gov. This interim guidance continues to represent what the Federal Interagency Task Force on Problem Drywall believes is the best approach based on the limited information available today. This identification guidance is based primarily on the presence of metal corrosion in homes as well as other indicators of problem drywall. Additional work will continue to validate these methods and the identification guidance will be modified as necessary.

Identification Method

The identification process is two steps: (1) an initial or threshold inspection to find visual signs of metal corrosion and evidence of drywall installation during the relevant time period, and (2) the identification of corroborating evidence or characteristics.

Step 1: Threshold Inspection

Visual inspection⁵ must show:

- (a) Blackening of copper electrical wiring and/or air conditioning evaporator coils; and
- (b) The installation of new drywall (for new construction or renovations) between 2001 and 2008.

A positive result for this step (including both criteria) is a prerequisite to any further consideration.

Step 2: Corroborating Evidence

Because it is possible that corrosion of metal in homes can occur for other reasons, it is important to obtain additional corroborating evidence of problem drywall. Homes with the characteristic metal corrosion problems must also have at least two of these corroborating conditions if the new drywall was installed between 2005 and 2008. For installations between 2001 and 2004, at least four of the following conditions must be met. Collecting evidence of these corroborating conditions will in some cases require professional assessors and/or testing by analytical laboratories.

- (a) Elemental sulfur levels in samples of drywall core found in the home exceeding 10 ppm;⁶
- (b) Corrosive conditions in the home, demonstrated by the formation of copper sulfide on copper coupons (test strips of metal) placed in the home for a period of two weeks to 30 days or confirmation of the presence of sulfur in the blackening of the grounding wires and/or air conditioning coils;

⁴ All references to the Federal Interagency Task Force on Problem Drywall in this document refer to the staff of the U.S. Consumer Product Safety Commission (CPSC) and the U.S. Department of Housing and Urban Development (HUD). 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.

⁵ For example, the Florida Department of Health’s Self-Assessment Guide on signs that a home may be affected by drywall associated corrosion (<http://www.doh.state.fl.us/environment/community/indoor-air/inspections.html>) has questions that may be helpful; mention in this guidance of this or other references does not imply endorsement.

⁶ Note that a preliminary screening for strontium levels exceeding 1200 parts per million may be useful to identify boards to test for elemental sulfur. The Task Force emphasizes, however, that such preliminary screening for strontium does not necessarily indicate the presence of problem drywall, rather only that additional testing in those areas may be advised.

- (c) Confirmed markings of Chinese⁷ origin for drywall in the home;
- (d) Elevated levels of hydrogen sulfide, carbonyl sulfide, and/or carbon disulfide emitted from samples of drywall from the home when placed in test chambers using ASTM Standard Test Method D5504-08 or similar chamber or headspace testing;⁸
- (e) Corrosion of copper metal to form copper sulfide when copper is placed in test chambers with drywall samples taken from the home.

⁷ This does not imply that all Chinese drywall or that only Chinese drywall is associated with these problems, but that among homes with the characteristic corrosion, Chinese drywall is a corroborating marker for the characteristic problems.

⁸ ASTM International. Standard D5504-08: Standard Test Method for Determination of Sulfur Compounds in Natural Gas and Gaseous Fuels by Gas Chromatography and Chemiluminescence. 2008. <http://www.astm.org/Standards/D5504.htm>. Subsequent revisions by ASTM of this standard will be considered to be “similar chamber or headspace testing” methods.

Detailed Description

August 27, 2010

Introduction

This revised preliminary identification guidance represents what the Federal Interagency Task Force on Problem Drywall believes is the best approach based on the limited information available today. We recognize that important additional guidance is still needed to clarify qualifications for inspectors and test laboratories and to describe methods for making the measurements in the criteria defined herein. This interim identification guidance is being released in recognition of the immediate need of homeowners for this information. Consumers should exercise caution in contracting for testing, and should be diligent in confirming the references, qualifications, and background of individuals and firms that offer such testing.⁹ Scientific investigations have moved as quickly as possible to understand the complex problems presented by the issue of Chinese¹⁰ 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.¹¹ The investigation continues on several fronts to expand our understanding of this issue – but the Task Force believes that current information is sufficient to revise the interim guidance on how to identify homes with problems associated with this drywall.

Findings have shown a strong association between the presence of problem drywall and metal corrosion in homes. The results of investigations reported by the Federal Interagency Task Force provide criteria and indicators for identifying those homes. The Task Force revised this preliminary guidance document based on these findings.

This revised identification guidance is based primarily on the presence of metal corrosion in homes as well as other indicators of problem drywall. It is possible to misclassify homes because of other possible sources of metal corrosion such as volatile sulfur compounds from sewer gas, well water, and outdoor contaminants that may enter the home independent of the drywall in the home. Homes may also be misclassified as having no drywall problem due to the absence of characteristics found to be typical in the limited testing to date. Given these limitations, additional work will continue to validate these methods and the identification guidance will be modified as necessary.

Identification Method

The identification process will be two steps: (1) an initial or threshold inspection to find visual signs of metal corrosion and evidence of drywall installation in the relevant time period, and (2) the identification of corroborating evidence or characteristics.

Step 1: Threshold Inspection

A visual inspection shall seek to identify blackening of copper electrical wiring and/or air conditioning evaporator coils (or documentation of replacement of evaporator coils due to blackened corrosion causing

⁹ FTC Consumer Alert, “Defective Imported Drywall: Don’t Get Nailed by Bogus Tests and Treatments”, <http://www.ftc.gov/bcp/edu/pubs/consumer/alerts/alt164.pdf>, December 2009.

¹⁰ The Interagency Task Force on Problem Drywall is conducting a broad investigation and its studies have included both Chinese and non-Chinese samples. While this work does reference “Chinese” drywall as a general term, we have not concluded that all Chinese-manufactured drywall may present corrosion or health issues, or that drywall made elsewhere will never present these issues.

¹¹ Reports and information released regarding problem drywall can be found at www.drywallresponse.gov.

failure), and the installation of new drywall (for new construction or renovations) between 2001 and 2008. Meeting both criteria for this step is a prerequisite for further consideration.

Rationale

Visual observations of corrosion of air conditioning evaporator coils and/or electrical wiring by trained inspectors is believed to be a prerequisite for consideration of a home as having problem drywall. The Florida Department of Health has long included such corrosion as part of its definition of problem drywall homes.^{12,13} It is appropriate to limit the dates to the relevant time period, as this corresponds to the vast majority of complaints received by the Consumer Product Safety Commission (CPSC). Also, much older homes could exhibit corrosion due to different sources acting over longer periods of time.

A CPSC contractor completed a detailed study of 51 homes in Florida, Louisiana, Virginia, Alabama, and Mississippi. The report was issued on November 23, 2009 and is available on www.drywallresponse.gov. This investigation included inspections of each home for the presence and extent of corrosion. Copper and silver metal test strips, called “coupons,” were also placed in the home for two weeks to test the corrosive environment of each house. The copper and silver coupons showed significantly higher rates of corrosion in homes where complaints had been registered than in the control homes. The dominant types of corrosion on the coupons were copper sulfide and silver sulfide, respectively, as determined by additional laboratory tests. Copper sulfide and silver sulfide appear as a black coating on copper or silver metal. Visual inspection and evaluation of electrical (ground) wire corrosion also revealed statistically significant greater corrosion in complaint homes compared to the control homes.

Step 2: Corroborating Evidence

Because it is possible that corrosion of metal in homes can occur for other reasons, it is important to obtain additional corroborating evidence of problem drywall. Homes with the characteristic metal corrosion problems must also have at least two of these corroborating conditions if the new drywall was installed between 2005 and 2008. For installations between 2001 and 2004, at least four of the following conditions must be met. Collecting this corroborating evidence will in some cases require professional assessors and/or testing by analytical laboratories.

- (a) Elemental sulfur levels in samples of drywall core found in the home exceeding 10 ppm;¹⁴
- (b) Corrosive conditions in the home, demonstrated by the formation of copper sulfide on copper coupons (test strips of metal) placed in the home for a period of two weeks to 30 days or confirmation of the presence of sulfur in the blackening of the grounding wires and/or air conditioning coils;
- (c) Confirmed markings of Chinese¹⁵ origin for drywall in the home;
- (d) Elevated levels of hydrogen sulfide, carbonyl sulfide, and/or carbon disulfide emitted from samples of drywall from the home when placed in test chambers using ASTM Standard Test Method D5504-08 or similar chamber or headspace testing;¹⁶

¹² Case Definition (03-31-09) for Premature Copper Corrosion in Residences Possibly Associated with the Presence of Imported Drywall from China.

¹³ Case Definition (12-18-09) for Drywall Associated Corrosion in Residences.
(<http://www.doh.state.fl.us/ENVIRONMENT/COMMUNITY/indoor-air/casedefinition.html>.)

¹⁴ Note that a preliminary screening for strontium levels exceeding 1200 parts per million may be useful to identify boards to test for elemental sulfur. The Task Force emphasizes, however, that such preliminary screening for strontium does not necessarily indicate the presence of problem drywall, rather only that additional testing in those areas may be advised.

¹⁵ This does not imply that all Chinese drywall or that only Chinese drywall is associated with these problems, but that among homes with the characteristic corrosion, Chinese drywall is a corroborating marker for the characteristic problems.

¹⁶ ASTM International. Standard D5504-08: Standard Test Method for Determination of Sulfur Compounds in Natural Gas and Gaseous Fuels by Gas Chromatography and Chemiluminescence, 2008.

(e) Corrosion of copper metal to form copper sulfide when copper is placed in test chambers with drywall samples taken from the home.

Rationale

The Federal Interagency Task Force's study of the elemental and chemical composition of 17 drywall samples shows higher concentrations of elemental sulfur and strontium in Chinese drywall than in non-Chinese drywall.¹⁷ Although, the 51-home study (41 homes with reported problems and 10 control homes) also found a correlation between elevated strontium levels and problem homes,¹⁸ additional testing was later conducted on a wide range of drywall samples and found that the use of strontium as a marker resulted in false-positives where some non-problem drywall samples (based on chamber testing) were found to contain elevated strontium levels.¹⁹ The Task Force does not believe strontium has a causative role, and in light of the possibility for false-positives we no longer consider elevated strontium levels to be valid corroborating evidence for problem drywall. However, in many cases, screening for strontium can be an effective tool in identifying what boards may warrant additional testing for elemental sulfur.^{17, 18, 19, 20} The additional testing in the contractor's draft report¹⁹ found that elemental sulfur (also known as orthorhombic sulfur) was highly correlated with problem drywall. Thus, the presence of elevated levels of elemental sulfur is believed to be corroborating evidence for homes with problem drywall.

The 51-home study and the preliminary corrosion reports^{18,21,22} also found that the type of corrosion present on copper coupons, copper electrical wire, and air conditioning evaporator coils was copper sulfide. Thus, the confirmation of copper sulfide or sulfur in the corrosion of the copper (and similarly silver sulfide or sulfur in the corrosion on silver coupons) is believed to be a corroborating marker.

Chinese drywall installed in the affected period has been associated with the types of corrosion problems reported. This does not imply that all Chinese drywall or that only Chinese drywall is associated with these problems, but that among homes with the characteristic corrosion, Chinese drywall is a corroborating marker for the characteristic problems. It is not absolutely necessary for the markings to be found as in some cases Chinese drywall does not have markings indicating nation of origin.

Additionally, the EH&E report on source markers (May 28, 2010) together with the preliminary results reported for the chamber study underway at the Lawrence Berkeley National Laboratory indicate that higher emission factors for reactive sulfur gases including hydrogen sulfide show a connection between certain Chinese drywall and corrosion in homes. In addition, the patterns of reactive sulfur compounds emitted from drywall samples show a clear distinction between certain Chinese drywall samples

<http://www.astm.org/Standards/D5504.htm>. Subsequent revisions by ASTM of this standard will be considered to be "similar chamber or headspace testing" methods.

¹⁷ Statistical Analysis of the Chemical Screening of a Small Sample of Unused Chinese and non-Chinese Drywall, October 30, 2009, <http://www.cpsc.gov/info/drywall/TabA.pdf>.

¹⁸ U.S. Consumer Product Safety Commission Staff Summary of Contractor's Indoor Air Quality Assessment of Homes Containing Chinese Drywall, November 23, 2009, <http://www.cpsc.gov/info/drywall/51homeStudy.pdf>.

¹⁹ Identification of Problematic Drywall: Source Markers and Detection Methods, May 28, 2010, <http://www.cpsc.gov/library/foia/foia10/os/EHESourceMarkers.pdf>.

²⁰ The Task Force emphasizes, however, that such identification of strontium does not necessarily indicate the presence of problem drywall, rather only that additional testing in those areas is advised.

²¹ Status Report on the Preliminary Analysis of HVAC, Gas Distribution, and Fire Safety Equipment Installed in Homes with Chinese Drywall, November 23, 2009, <http://www.cpsc.gov/info/drywall/PrelimHVACGasDistFireSyst.pdf>.

²² Interim Report on the Status of the Analysis of Electrical Components Installed in Homes with Chinese Drywall, November 23, 2009, <http://www.cpsc.gov/info/drywall/prelimelectrical.pdf>.

manufactured in 2005/2006 and other Chinese and non-Chinese drywall samples. Also, the 51-home study reported an association between hydrogen sulfide levels in homes and corrosion in those homes. Therefore, one of the corroborating tests is chamber emissions testing of suspect drywall from homes. Another similar corroborative test is determining if corrosion of copper metal to form copper sulfide occurs when copper is placed in test chambers with drywall. The Task Force recognizes, however, that such chamber tests may be costly and time consuming options.

Continuing Development of this Guidance

We will incorporate future findings as appropriate to improve upon this preliminary guidance. More information on problem drywall is available at the federal Drywall Information Center website, www.drywallresponse.gov.