

## Appendix B2

### Lead-Based Paint Management

**B2-1-1. Policy:** The installation policy is to identify and manage all lead-based paint materials within its area of responsibility. Further, DPW will manage or abate all surfaces that contain lead-based paint materials which pose an immediate health hazard. This includes lead-based paint and lead-contaminated dust in target facilities and public buildings (interior and exterior surfaces), exterior painted structures (such as playground equipment), and contaminated soil.

**B2-1-2. Applicable Regulations:**

- a. Occupational Safety and Health Administration (OSHA) Regulations:
  - (1) 29 CFR 1910.1025, Lead Standard (Subpart Z Toxic and Hazardous Substances)
  - (2) 29 CFR 1910.134, Respiratory Protection Standard
  - (3) 29 CFR 1910.1200, Hazard Communication Standard
- b. Environmental Protection Agency (EPA) Regulations:
  - (1) 40 CFR Part 745, Lead-Based Paint Poisoning Prevention
  - (2) 40 CFR 260-280, Hazardous Waste Management
  - (3) 49 CFR 100-178, Hazardous Materials Transportation
- c. Commonwealth of Virginia Regulations:
  - (1) 18 VAC 15-30, Virginia Lead-Based Paint Activities Regulations
  - (2) 9 VAC 20-60, Virginia Hazardous Waste Regulations
- d. Army Regulations:
  - (1) AR 11-34, The Army Respiratory Protection Program
  - (2) AR 40-5, Preventive Medicine
  - (3) AR 200-1, Environmental Protection and Enhancement
  - (4) AR 200-2, Environment Effects of Army Actions
  - (5) AR 420-70, Buildings and Structures
- e. US Department of Housing and Urban Development: Guidelines for the Evaluation and Control of Lead-Based Paint Hazards in Housing, June 1995.

**B2-1-3. Definitions:**

**Abatement:** Any set of measures designed to correct and eliminate lead-based paint hazards. Abatement includes the **removal** of lead-based paint and lead-contaminated dust, the permanent containment or **encapsulation** of lead-based paint, the **replacement** of lead-painted surfaces or fixtures, and the removal or covering of lead-contaminated soil. Abatement also includes all preparation, cleanup, worker protection, disposal, and post-abatement clearance testing activities associated with such measures.

**Accessible Surface:** Any protruding interior or exterior surface that a young child can mouth or chew.

**Containment:** A process for protecting workers and/or the environment by controlling exposures to lead dust or debris created during abatement.

**Certified Contractor:**

(1) A contractor, inspector, or supervisor who has completed a training program certified by the appropriate Federal agency and has met any other requirements for certification or licensure established by such agency or who has been certified by any State through a program which has been found by such Federal agency to be at least as rigorous as the Federal certification program; and

(2) Workers or designers who have fully met training requirements established by the appropriate Federal agency.

**Deteriorated Paint:** Any interior or exterior paint that is peeling, chipping, blistering, flaking, worn, chalking, cracking or otherwise becoming separated from the substrate..

**Disposal Facility:** A facility or part of a facility at which hazardous waste is intentionally placed into or on any land or water, and at which the waste will remain after closure.

**Encapsulation:** A method of abatement that involves the coating and sealing of surfaces with durable, paint-like coatings specifically formulated to be elastic, long-lasting, and resilient to cracking, peeling, algae, and fungus so as to prevent chalking, flaking, lead-containing substances from becoming part of house dust or accessible to children.

**Enclosure:** The resurfacing or covering of surfaces, and sealing or caulking with durable materials so as to prevent or control chalking, flaking, lead-containing substances from being part of house dust or accessible to children.

**Environmental Command Council:** The Environmental Command Council (ECC) serves as an environmental advisor to the command and monitors the Fort Eustis and Fort Story overall environmental management program. The ECC reviews environmental policy, facilitates coordination and solves environmental problems. The ECC is comprised of members and Activity Environmental Coordinators (AECs) representing each command, directorate or tenant activity at the United States Army Transportation Center (USATC).

**Hazardous waste:** By-product of society that can pose a substantial or potential hazard to human health or the environment when improperly managed. It is a solid waste, which possesses at least one of four characteristics (ignitability, corrosivity, reactivity, and toxicity), or appears on special EPA lists. A hazardous waste is regulated under Subtitle C of RCRA. The regulatory definition of hazardous waste is found in 40 CFR 261.3.

**High Efficiency Particulate Air (HEPA) Filter:** A filter capable of filtering out particles of 0.3 microns or greater from a body of air at 99.97 percent efficiency or greater.

**In-place Management:** An abatement strategy which reduces exposure to lead by encapsulating, covering, or enclosing surfaces containing lead-based paint. This process leaves the lead in place but protects occupants by reducing the chance of exposure.

**Inspection:** A surface by surface investigation to determine the presence of lead-based paint as provided in Section 302 (c) of the Lead-Based Paint Poisoning Prevention Act and the provision of a report explaining the results of the investigation.

**Interim Controls:** A set of measures designed to reduce temporarily human exposure or likely exposure to lead-based paint hazards, including specialized cleaning, repairs, maintenance, painting, temporary containment, ongoing monitoring of lead-based paint hazards or potential hazards, and the establishment and operation of management and residential education programs.

**Lead-Based Paint:** Lead-based paint is any paint in which the nonvolatile content of the liquid paint contains more than six one-hundredths of one percent (0.06%) lead. When testing existing paint on surfaces, lead-based paint is any paint which tests equal to or greater than 1.0 milligram/cm<sup>2</sup> lead when using a X-ray Fluorescence analyzer or 0.5% lead by weight when using Atomic Absorption Spectroscopic analysis.

**Lead-Based Paint Hazard:** Any condition that causes exposure to lead from lead-contaminated dust, lead-contaminated soil, lead-contaminated paint that is deteriorated or present in accessible surfaces, friction surfaces, or impact surfaces that would result in adverse human health.

**Lead-Contaminated Dust (wipe standards):**

Floors =	> 40 micrograms per ft <sup>2</sup>
Window Sills =	> 250 micrograms per ft <sup>2</sup>
Window Wells =	> 400 micrograms per ft <sup>2</sup>

**Replacement:** A strategy of abatement that entails removing components such as windows, doors, and trim that have lead-painted surfaces and installing components free of lead.

**Resource Conservation and Recovery Act (RCRA):** The Federal statute that regulates the generation, treatment, storage, disposal, recycling, or transportation of solid and hazardous waste.

**Risk Assessment:** An onsite investigation of a residential dwelling to discover any lead-based paint hazards. Risk assessments include an investigation of the age, history, management, and maintenance of the dwelling, and the number of children under the age of six years and women of childbearing age who are residents; a visual assessment; limited environmental sampling (i.e., collection of dust wipe samples, soil samples, and deteriorated paint samples); and preparation of a report identifying acceptable abatement and interim control strategies based on specific conditions.

**Target Facilities:** Government owned or leased facilities constructed prior to 1978 which are used regularly by children six years old or younger or by pregnant women as family housing, child development centers, family child care homes, schools, playgrounds, and similar facilities. Facilities constructed or included in whole-house revitalization or similar major rehabilitation projects since 1978 are considered free of lead-based paint if all paint coatings were removed or replaced.

**Toxicity Characteristic Leaching Procedure (TCLP):** Required test under RCRA to determine the toxicity and mobility of a waste's hazardous constituents.

**X-ray Fluorescence Spectrum Analyzer (XRF):** An instrument that determines lead concentration in milligrams per square centimeter (mg/cm<sup>2</sup>) using the principle of x-ray fluorescence.

**B2-2. Responsibilities.**

**B2-2-1. Directorate of Public Works (DPW):**

a. Lead-Based Paint Management Coordinator (LBPMC):

- (1) Has overall responsibility and management of the Lead-Based Paint Management Program.
- (2) Maintains all records relating to lead-based paint identification, control and most removal actions (with the exception of medical/health records).
- (3) Enters lead-based paint sampling and survey results into the Environmental and Natural Resources Division (ENRD) Lead Survey Computer Database.
- (4) Ensures information is updated and available so users, engineers, shop personnel, custodial and others can identify potential lead-based paint containing areas.
- (5) Takes or coordinates collection, submission, and testing of bulk, air and wipe samples for lead.
- (6) Per request, coordinates and/or assists in surveys and inspects reported damage to lead-based paint.
- (7) Coordinates results of testing with Industrial Hygiene to ensure appropriate personal protective equipment, work practices, and access controls are being utilized.
- (8) Has the authority to regulate areas containing visible contamination, which may pose a potential health hazard to building occupants or maintenance personnel. Information regarding such areas is forwarded to the Industrial Hygiene Section for review, monitoring, and comments addressing the health hazard. Coordinates results of testing with Industrial Hygiene and ensures that proper warnings and access controls are issued to users and building occupants.
- (9) Provides summary copies of lead sampling results to building users and/or DPW divisions required to perform maintenance or construction in a facility to minimize unnecessary contamination.
- (10) Reviews work requests to determine if work may involve the disturbance of any lead-based paint.
- (11) Acts as clearing house for all lead-based paint actions. Develops lead management or abatement based on the identification of lead-based paint and the conditions of such surfaces. Projects are developed in coordination with ENRD, Safety, and Industrial Hygiene. Abatement associated with other work or demolition should be developed by responsible division and/or activity and reviewed by the LBPMC.
- (12) Serves as a technical consultant, assisting Engineering Services Division (ESD) with the design and execution of contract lead-based paint abatement and control projects.
- (13) Provides lead awareness training to DPW employees and other post personnel such as Activity Environmental Coordinators.
- (14) Maintains updated certification requirements to be qualified as a lead inspector/risk assessor.
- (15) Ensures that any unresolved lead management issues are brought before the US Army Transportation Center Environmental Command Council.

b. Engineering Services Division (ESD):

(1) Ensures adequate identification of lead-based paint prior to the start of any renovation or demolition project. Checks existing survey and testing records available from the LBPMC. Requests additional lead testing by designer or separate contract, if required.

(2) Provides the LBPMC with the results of any of the above testing so that facility records may be maintained and database entries updated.

(3) Provides the LBPMC with results and documentation of all lead abatement done through ESD contracts in order that lead data may be updated.

(4) Forwards copies of lead abatement plans to the LBPMC, Post Safety, and Industrial Hygiene for review and approval.

(5) Ensures proper coordination has been made with facility/building occupant prior to start of any work.

(6) Informs the LBPMC of any lead contamination incident so that proper response action may be taken.

(7) Documents that Division employees are properly trained in lead matters.

c. Business Management Division:

(1) Generates work requests for self-help and troop projects.

(2) Ensures that Self-Help projects are reviewed for possible disturbance of lead-based paint. After receiving a defined scope of work from Estimating, the work request is forwarded to the LBPMC, or a designated lead qualified person, for review. An Asbestos/Lead Based Paint Caution form, Appendix B, will be filled out by the LBPMC or designated lead qualified person, signed by the facility user, and filed in the project folder. The work request is then returned to the Estimator to determine the potential cost of the project, to include any lead abatement necessary. All lead-based paint subject to disturbance in such projects must be abated by lead trained and qualified personnel prior to turning the work over to the building occupants as a Self-Help project.

(3) Ensures adequate funding is programmed for lead abatement projects. Coordinates requests with ENRD for submittal in the 1383 Reporting System.

(4) Informs the LBPMC of any lead contamination incident so that proper response action may be taken.

d. Environmental and Natural Resources Division (ENRD):

(1) Reviews all work orders requests for possible environmental impact, to include lead.

(2) Reviews and approves lead abatement plans for compliance with environmental regulations.

(3) Reports instances of environmental lead contamination to proper State, Federal and TRADOC authorities and ensures necessary cleanup actions are taken.

(4) Documents that ENRD personnel are properly trained in lead awareness.

(5) Performs (or coordinates) sampling/inspections for lead-based paint.

e. Facilities Support Division (FSD):

(1) Requests through Chief, ENRD, that the LBPMC check existing survey and testing records prior to any work that may disturb any lead-based paint. Requests additional testing if area scheduled for work is questionable.

(2) Posts and secures lead contaminated areas.

(3) FSD performs randomly selected Quality Assurance Evaluations of lead abatement work performed by the contractor. The contractor supervises and performs Quality Control inspections of any lead abatement work done by the contractor.

(4) Informs the LBPMC of any lead contamination incident so that proper response action may be taken.

(5) Ensures waste generated from lead abatement projects is handled and disposed in accordance with the Fort Eustis Hazardous Waste Management Standing Operating Procedures.

f. Housing Division:

(1) Provides occupants with notice of possible lead-based paint areas in quarters, procedures to take to prevent accidental disturbance, proper cleaning procedures, and provides occupants with a copy of the EPA pamphlet, "Protect Your Family From Lead in Your Home" prior to their signing for quarters built before 1978.

(2) If a family member is pregnant, already lead poisoned, or otherwise identified by medical authority as at an increased risk for lead poisoning, this will be considered when assigning quarters.

(3) Informs the LBPMC of any lead contamination incident so that proper response action may be taken.

(4) Manages maintenance contracts for Family Housing.

g. Fire and Emergency Services Division:

(1) Informs the LBPMC of any lead contamination incident so that proper response action may be taken.

(2) Documents that employees are properly trained in lead matters.

h. Fort Story DPW:

(1) Requests through Chief ENRD, that the LBPMC check existing survey and testing records prior to any work that may disturb any lead-based paint. Request additional testing if area scheduled for work is questionable.

(2) Posts and secures lead contaminated areas.

(3) Informs the LBPMC of any lead contamination incident so that proper response action may be taken.

(4) Provides the LBPMC with results and documentation of lead abatement projects done by NPWC on Army facilities at Fort Story in order that lead data may be updated.

**B2-2-2. POST SAFETY:**

a. Informs the LBPMC of any lead contamination incident so that proper response action may be taken.

b. Reviews and approves lead abatement plans for compliance with OSHA regulations.

c. Insures that any unresolved lead management issues are brought before the US Army Transportation Center Environmental Command Council.

d. Upon request, provides guidance on implementing 29 CFR to all appropriate activities.

e. Conducts respirator fit testing for individuals participating in the installations respiratory protection program.

**B2-2-3. MEDDAC:**

a. Industrial Hygiene:

- (1) Informs the LBPMC of any lead contamination incident so that proper response action may be taken.
- (2) As needed, conducts personal and general air monitoring on work sites for lead, including in-house lead abatement projects. Monitoring shall be conducted in accordance with 29 CFR 1910.1025.
- (3) Provides lead monitoring results to the LBPMC.
- (4) Reviews and approves lead-based paint abatement plans.

b. Occupational Health:

- (1) Performs necessary medical exams as required in the lead medical surveillance program.
- (2) Provides Pulmonary Function Testing to Government employees participating in a respiratory protection program.
- (3) Maintains occupational medical records for Government employees.

c. Community Health:

- (1) Informs the LBPMC of any lead contamination incident so that proper response action may be taken.
- (2) Performs health risk assessments for military medical care beneficiaries where venous blood lead levels are equal to or greater than 10 ug/dl.
- (3) Ensures that any unresolved lead management issues are brought before the US Army Transportation Center Environmental Command Council.
- (4) Provides the LBPMC with the results of all lead testing that show elevated blood lead levels on family members occupying government quarters.

**B2-2-4. Northern Region Contracting Center (NRCC):**

- a. Awards and administers contracts for lead removal and/or those requirements which contain some lead-based paint removal provisions. Further, will provide a final review of contract specifications to assure lead removal is included when appropriate.
- b. When informed of a lead contamination incident by a vendor or inspector, assures the LBPMC is notified so proper action may be taken to correct the situation.

**B2-2-5. Directorate of Personnel and Community Activities (DPCA):**

a. Child Development Services:

- (1) Insures that any unresolved lead management issues are brought before the US Army Transportation Center Environmental Command Council.
- (2) Notifies ENRD (LBPMC) and MEDDAC (Preventive Medicine) upon identification of potential or known lead-based paint hazards in Family Child Care units.

b. Youth Services:

(1) Insures that any unresolved lead management issues are brought before the US Army Transportation Center Environmental Command Council.

(2) Notifies ENRD (LBPMC) and MEDDAC (Preventive Medicine) upon identification of potential or known lead-based paint hazards.

**B2-3-1. Environmental Sources:** Lead-based paint that deteriorates and becomes detached from its supported structure creates a serious environmental hazard that can affect the health of the Fort Eustis/Story community. Fort Eustis and Fort Story have many buildings containing lead-based paint. Environmental exposures from lead-based paint may occur as a result of any of the following circumstances:

a. Deterioration of lead-based paint on abandoned/condemned and operational buildings (both interior and exterior). Lead-based paint eventually begins to deteriorate. This is enhanced by weathering, humidity, etc. Lead-based paint chinks, creating chips and fine particles.

b. Renovation of existing buildings that contain lead-based paint. Dust hazards and soil contamination occur from scraping, sanding, grinding and other means of removing lead-based paint.

c. Demolition of buildings containing lead-based paint. This creates lead-containing dust and contamination of the surrounding soil.

d. Improper lead-based paint abatement. Fort Eustis/Story personnel or contractors performing duties of lead abatement can create hazards by not using proper procedures.

e. Improper disposal of lead-based paint waste. Materials containing lead-based paint must be tested using the Toxic Characteristic Leaching Procedure (TCLP) before disposal. Disposal must be in accordance with the Resource Conservation and Recovery Act (RCRA).

f. Exposure can also occur by accidental ingestion of soil particles via hand to mouth activity. Furthermore, consumable garden vegetables can take up lead in contaminated soil. Occupational exposures can cause environmental exposure when employees bring home lead-contaminated dust or soil on their shoes or clothing.

**B2-3-2. Controls:** Possible lead exposure from the above circumstances can be controlled through lead-based paint identification and proper project design and execution.

**B2-4-1. Occupational Exposure:** The lead standard was developed through animal toxicity studies to protect the health of individuals in the workplace. Employees may, on occasion, work in the presence of lead compounds, usually in the inorganic form. The permissible exposure limit (PEL) is fifty micrograms per cubic meter of air (50 ug/m<sup>3</sup>) averaged over an 8-hour period, at which nearly all workers may be exposed without any adverse health effects. The standard is intended to protect individuals from immediate and long-term toxic effects of lead. In the workplace, lead is mainly absorbed into the body through inhalation, although ingestion can be another route of exposure. Lead gets airborne through various means. In the form of dusts, fumes or mist, the lead can be inhaled, enter the respiratory tract and on into the lungs. Once the inhaled particles enter the bloodstream in the gas exchange region of the lungs (alveoli), they are circulated throughout the body and stored in various target organs. Lead entering the body through swallowing will have the same effect on the body. Some lead may be excreted, but not all will. This stored lead has the potential for irreversible damage.

**B2-4-2. Prevention:**

a. Working lifetime - maintain blood lead levels below forty micrograms per 100 grams of whole blood (40 ug/100g).

b. Workers with potential for exposure (i.e. welders, lead abatement workers, deck personnel grinding on decks, etc.) should be included in the post medical surveillance program.

c. Utilizing personal protective measures in the workplace:

(1) Personal Protective Equipment (PPE) such as respirators and protective coveralls.

(2) Personal hygiene measures such as washing hands prior to eating, not eating in work areas, and showering before going home.

(3) Substitution of other paints for lead-based paint.

**B2-4-3. References:**

a. Chemical Hazards of the Workplace - 3rd Edition

b. 29 CFR 1910.1025 - Lead Standard – 1994

**B2-5-1. Prevention of Childhood Lead Exposure:**

a. A policy of either universal childhood blood lead screening or targeting only high risk groups will be determined by the Installation Medical Authority.

b. The Pediatric Clinic at McDonald Army Community Hospital routinely tests blood lead levels of children at 12 months of age or when otherwise indicated.

c. Preventive Medicine maintains data on elevated blood lead levels in the community to identify trends and demographic characteristics.

d. Lead-based paint management is an integral part of the prevention of new cases.

**B2-5-2. Referral:**

a. The Pediatric Clinic will notify the Community Health Nurse (CHN) section when an infant or child's venous blood lead level is greater than or equal to 10 ug/dl.

b. The CHN section will initiate contact with the family to conduct an epidemiological investigation, provide education, and emphasize the importance of compliance with medical recommendations. A home visit will be made, if indicated, to on-post quarters. The CHN will report elevated blood lead levels occurring in off-post quarters to the local public health department.

c. The CHN section will ensure, in coordination with the Chief, Preventive Medicine Services, that individuals or agencies responsible for the family's housing are notified and are aware of the health issues related to elevated blood lead levels.

**B2-5-3. Education:** Increase public awareness through articles in the Wheel and by dissemination of educational materials in the Child Development Centers, hospital clinics, emergency room, post housing, and health fairs.

**B2-5-4. Health Risk Assessment:** Once an elevated blood lead level has been found, a nutritional and environmental evaluation will follow.

**B2-5-5. Blood Lead Screening:**

a. The CHN section monitors all finger-stick results and when levels are greater than or equal to 10 ug/dl, ensures that a venous blood lead level is drawn.

b. If the venous blood lead level draw is greater than or equal to 10 ug/dl, the CHN is notified; patients with elevated blood lead levels will be followed by a health care provider; to include sequential testing and treatment if indicated. The CHN will maintain a history of blood lead test results on a database, maintained indefinitely.

**B2-6-1. Lead-Based Paint Management Procedures:** Management of lead-based paint can range from interim controls such as covering the paint to complete removal. There are two different strategies for the abatement of lead-based paint: removal and in-place management. In-place management is defined as those processes which make lead-based paint inaccessible by covering or sealing painted surfaces.

**B2-6-2. The Removal Strategies:**

a. Replacement is defined as the removal of components that have lead-painted surfaces and installing new components free of lead-containing paint. Replacement should be considered for components that can be easily removed such as wood trim, windows, doors, etc.

b. Removal is defined as the removal of lead-based material/paint down to the bare substrate by using either heat, chemical and/or mechanical methods. All on-site paint removal methods may produce large amounts of lead dust and lead residue. They are more hazardous than other methods and should be used with care. All on-site paint removal methods must be done by trained and licensed personnel.

**B2-6-3. The Covering Strategies:**

a. Enclosures: Enclosures (sometimes referred to as rigid encapsulants) include but are not limited to paneling, gypsum board, plywood, tile board, and aluminum and vinyl siding. All enclosure materials should be applied with fasteners and adhesives and installed following the manufacturer's directions.

b. Encapsulants: Encapsulation should be considered for surfaces difficult to remove (e.g., baseboards behind pipes). These surfaces are frequently found in kitchens and bathrooms where plumbing and fixtures make access to surfaces difficult. Encapsulants are not suitable for surfaces subject to any kind of abrasion, such as floors, window jambs or sashes, or doorjambs or edges. Because of the brittle nature of many encapsulants, they may tend to chip and flake with substrate deterioration. Suitable surfaces, depending upon toxicity, are: interior walls and ceilings, woodwork and wood trim, exterior masonry and wooden surfaces, and metal pipes.

**B2-6-4. Army's Policy for Managing Lead-Based Paint:**

a. The Army's policy for controlling lead-based paint encourages in-place management as opposed to removal. In-place management procedures are used in preventing low risk conditions from deteriorating to create high risk conditions in the future. Lead-based paint should only be removed when in-place management is not effective; when removal is more cost effective than in-place management; or during whole-house revitalization or major renovation projects.

b. In-place management requires periodic monitoring of surfaces known or suspected to be painted with lead-based paint. If it is suspected that lead levels in dust may be increasing, periodic clean ups should be done to keep lead from accumulating to dangerous levels on accessible surfaces such as windowsills, window wells and floors.

c. In-place management also requires that precautions be taken to avoid inadvertently disturbing lead-based paint or otherwise creating lead-contaminated dust hazards in the course of other maintenance, repair, or revitalization work. Any work disturbing lead-based paint has the potential for generating lead dust. The level of risk is a function of the scale of work and the amount of dust generated, however, it does not take much lead dust to poison a child or adult. At a minimum, in-place management requires a rigorous clean up at the conclusion of any repair project which disturbs lead-based paint.

d. All procedures which require the removal of lead-based paint must be performed by a certified deleading contractor. It is essential that personnel directly involved with reducing lead-based paint hazards are provided appropriate training to make them aware of the hazards of lead, proper procedures and work practices, and the need for protective equipment and proper hygiene.

e. Protection of Residents:

(1) Housing residents or facility occupants shall not be permitted in the unit or in the vicinity of the job while abatement procedures are being carried out. Residents' belongings shall be protected from possible exposure to lead dust released during the project. Cleanup of all dust and debris will be required at the end of each workday. Complete cleanup, final inspections and clearance testing shall be required prior to reoccupancy.

(2) In some cases, it may be possible to conduct preventive maintenance and repair projects while occupants remain in their homes or work areas. Care should be exercised to keep occupants and all children away from the work area and to protect their belongings from possible lead dust contamination.

(3) Occupant Education: ENRD has created an informational pamphlet addressing lead-based paint issues and has distributed it throughout the installation community. The pamphlet provides information on protecting children from lead poisoning, the importance of wet mopping with tri-sodium phosphate detergents to control lead dust accumulation, and points of contact for the identification and handling of lead-based paint or available health screening programs.

**B2-7-1. Inspections and Sampling:** The Lead-Based Paint Management Coordinator (LBPMC) coordinates/conducts lead inspections of government buildings for the presence of lead-based paint to prevent release into the environment. Additionally, the LBPMC coordinates/conducts sampling operations for media suspected of containing lead-based paint. This may include sampling soil, paints, water, air and refuse/wastes. All inspections and sampling are performed IAW established HUD guidelines and EPA protocols.

**B2-8-1. Personal Protective Equipment:** Exposure to lead from lead-based paint can often occur in the occupational setting. It is particularly important that employees utilize the proper personal protection equipment (PPE) when performing tasks that may involve exposure. This includes removing old paint from buildings and other structures (such as sanding, grinding and chipping), lead-based paint abatement work, lead-based paint inspection and general construction/demolition operations. To avoid exposure, employees must comply with appropriate laws, Army regulations and installation policies.

**B2-8-2. Respiratory Protection:**

a. General: Dust generated from deterioration, destruction or removal of lead-based paint represents an important health hazard. Employees may become exposed to lead dust by inhalation. Subsequently, the use of approved respirators as directed by the USATCFE Respiratory Protection Program is required.

b. Policy:

(1) Appropriate respirators are used when lead dust is present at the work site. Generally, an air-purifying respirator with appropriate filter cartridges is used. However, supervisors must consider all factors associated with the work site to preclude other hazards. Other chemical hazards or oxygen-deficient environments may exist that require air-line or self-contained breathing apparatus (SCBA) respirators.

(2) Only National Institute for Occupational Safety and Health (NIOSH)-approved respirators are used.

(3) Personnel will not perform tasks that require use of a respirator unless such personnel have had medical clearance, respirator training, fit testing and proper respirators have been provided.

**B2-9-3. Personal Protection Equipment (PPE):**

a. General: The type of work environment that may contain lead-based paint hazards is variable. Proper safe work attire must be worn based on the work site conditions. Regardless of the work site conditions, employees should take all precautions against contaminating street clothes and foot wear with dust and debris suspected or known to contain lead. If such contamination occurs, it is likely that lead will be carried to other work sites or the home where other people can be exposed.

b. Personal Protective Clothing and Equipment.

(1) In addition to wearing approved respirators, employees with potential for exposure to lead-based paint hazards should also wear protective clothing. For normal lead inspection or abatement work, disposable protective outer garments should be used. In addition, other work site factors should be considered. Eye protection such as goggles is necessary to avoid dust contact with the eyes. Proper foot wear and disposable gloves are also required. Other items such as hard hats are recommended.

(2) Supervisors must still consider all characteristics of the work site to ensure that employees are protected against other hazards besides lead.

**ASBESTOS AND LEAD-BASED PAINT CAUTION FORM**

PROJECT NUMBER: \_\_\_\_\_

FACILITY: \_\_\_\_\_

WORK DESCRIPTION: \_\_\_\_\_

\_\_\_\_\_  
\_\_\_\_\_

DPW has completed a survey in accordance with Army Regulation 200-1, which requires that all Army structures be surveyed to determine the location, quantity and condition of any asbestos containing materials (ACM). A similar survey will be conducted to evaluate the extent of lead-based paint (LBP) in selected facilities. This information will be provided to building occupants to prevent the accidental disturbance of these materials. It is understood that some areas may require additional sampling to fully identify all potential problems.

The following materials have been identified in your facility:

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

I, the undersigned, hereby verify that I have been informed of the presence or possible presence of asbestos containing material and/or lead-based paint in this facility.

Prior to working in the facility of known or assumed asbestos containing material and/or lead-based paint, I shall notify DPW, obtain approval and follow procedures designed to protect myself, other building occupants, and the environment.

I fully understand that the materials mentioned above must not be disturbed, removed, or altered in any fashion. Work which requires the disturbance of ACM or LBP must be accomplished by properly trained and licensed personnel. Coordinate with DPW to ensure the material is handled and disposed of in accordance with all appropriate Federal/State laws and regulations.

Name of Requestor \_\_\_\_\_  
(please print)

Signature \_\_\_\_\_

Organization \_\_\_\_\_

Telephone number \_\_\_\_\_

TCFE Reg 200-6

TCFE FORM 6031-ENRD-DPW (17 Jan 96)

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