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UNITED STATES AIR FORCE
WASHINGTON DC 20330

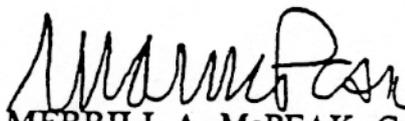
24 MAY 1993

FROM: HQ USAF/CC
1670 Air Force Pentagon
Washington, DC 20330-1670

SUBJ: Air Force Policy and Guidance on Lead-Based Paint in Facilities

TO: ALMAJCOM-FOA/CC HQ AFDW/CC

- * 1. Ingestion of lead or lead dust can cause serious adverse health effects in adults and especially in children. The attached policy specifies the actions required to protect facility occupants and workers and the environment from hazardous exposure to lead in lead-based paints. The policy applies to all Air Force active, Air National Guard and Air Force Reserve installations and facilities, regardless of location.
2. Please give this matter your prompt attention so that personnel living on our installations, their families, and all who work there will be adequately protected.


MERRILL A. McPEAK, General, USAF
Chief of Staff

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1. Lead-Based Paint Policy
 2. Lead-Based Paint Guidance

AIR FORCE POLICY
ON
LEAD-BASED PAINT IN FACILITIES

1. References.

a. House of Representatives Report 102-95, Fiscal Year 1992 Department of Defense (DoD) Appropriations Act.

b. 16 C.F.R. 1303, Ban of Lead-Containing Paint and Certain Consumer Products Bearing Lead-Containing Paint, implementing the Consumer Product Safety Act of 1977.

c. 24 C.F.R., Part 35, Lead-Based Paint Poisoning Prevention in Certain Residential Structures.

d. Title 42 U.S.C., Section 4822, as amended, Lead-Based Paint Poisoning Prevention Act (LBPPPA) of 1971.

e. Federal Register, 18 April 1990, Vol. 55, No. 75, Department of Housing and Urban Development, Lead-Based Paint: Interim Guidelines for Hazard Identification and Abatement in Public and Indian Housing, as amended, September 1990.

f. 29 C.F.R. 1926, Safety and Health Regulations for Construction.

g. 29 C.F.R. 1910.1025, Occupational Safety and Health Standards, Lead.

h. 40 C.F.R. 50.12, National Primary and Secondary Ambient Air Quality Standards for Lead.

i. 40 C.F.R. 240 through 280, implementing the Resource Conservation and Recovery Act (RCRA).

j. 40 C.F.R. 302, implementing the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA).

k. DoD Directive (DoDD) 6050.16, DoD Policy for Establishing and Implementing Environmental Standards at Overseas Installations.

l. P.L. 102-550, Title X, Residential Lead-Based Paint Hazard Reduction Act of 1992.

m. 15 U.S.C. 2601 et seq., The Toxic Substances Control Act (TSCA).

2. Application.

a. This policy applies to all Air Force, Air National Guard, and Air Force Reserve active installations and facilities, including overseas locations.

b. Compliance with applicable federal, state, interstate, and local laws and regulations for LBP activities, environmental protection, and occupational health and safety is required. Refer to the attached guidance for procedures and practices needed to implement this policy.

3. Background. Ingestion of lead or lead dust can cause a variety of adverse health effects in children and adults. Lead pigments in paint applied to facilities can be a source of hazardous exposure to lead. Children are at greater risk due to their lower body weight, developing nervous system, and greater tendency to ingest paint chips and dust. Based on common painting practices and legal restrictions, LBP is likely to be found in all industrial facilities, on all steel structures (water tanks, pipelines, etc), in yellow painted pavement markings, and in nonindustrial facilities constructed prior to 1980. Painted ferrous metal surfaces in nonindustrial facilities constructed during or after 1980 are also likely to contain LBP.

* 4. Legislation and Regulations. Congress directed the Department of Defense (DoD) to take a more active role in ensuring military dependent children are not affected by LBP health hazards (reference 1a.). Prior legislation restricted lead in paint used in nonindustrial facilities effective in 1978 (reference 1b) and in residential structures constructed and rehabilitated by federal agencies (reference 1c). The LBPPPA and associated guidelines took steps to eliminate LBP in Public and Indian Housing (references 1d and 1e). Occupational Safety and Health Administration regulations specify worker protection requirements in the construction and general industry (references 1f and 1g), and environmental regulations address restrictions on emissions (reference 1h) and when LBP debris must be controlled as a hazardous waste (references 1i and 1j). The LBPPPA and TSCA were amended and a program established to evaluate and reduce LBP in housing (references 1l and 1m).

5. Terms Explained.

a. LBP Hazard Determination. A specific determination made by Base Bioenvironmental Engineering in consultation with Base Civil Engineering. A hazardous situation generally exists if children under age seven are chewing on painted surfaces or are exposed to LBP dust, soil contaminated with lead or deteriorated LBP (i.e., flaking, peeling, chipping, or cracking), or if other occupants or workers are subjected to prolonged or repeated exposure to airborne LBP dust.

b. In-Place Management. Interim measures which reduce an LBP hazard to acceptable levels. They include monitoring the condition of painted surfaces and reducing dust by high-phosphate detergent washing or top coating by painting or wall coverings, repairing deterioration by painting, and performing

cleanup activities such as high-efficiency particle air (HEPA) vacuuming, disposing of contaminated carpeting, and decontaminating upholstered furniture to the maximum extent possible and the establishment and operation of resident and management education programs.

c. Abatement. Long-term or permanent measures which eliminate the possibility of hazardous exposure by replacement of building components (doors, cabinets, molding, etc), encapsulation with drywall or siding, and removal (reference 1d). May be applied throughout a facility or in selected areas only.

6. Actions To Be Taken. Air Force installations will:

a. Identify, evaluate, control, and eliminate existing LBP hazards. Give priority to facilities or portions of facilities which are frequented by children under age seven and areas in those facilities which contain painted surfaces in deteriorated condition. Consider using in-place management first to reduce the risk of hazardous exposure to acceptable levels. Perform abatement when in-place management will not control the hazard effectively or when it is cost-effective during normal facility renovation and upgrade programs.

b. Protect facility occupants, especially children, and workers from existing LBP hazards. Ensure facility occupants are removed from a hazard area and blood lead level determinations are performed as soon as possible on children under seven who have been exposed. Perform investigations when children with elevated blood lead levels are identified and determine the source of lead and remedial actions.

c. Prevent LBP hazards from developing. Take precautions when disturbing LBP and when maintenance, repair, modification, and renovation activities disturb painted surfaces in priority facilities and other facilities likely to contain LBP.

d. Restrict Use of LBP. Do not specify, purchase, use, or approve for use on any existing or proposed industrial or non-industrial facility paints or coatings containing lead above the regulated amount specified for nonindustrial facilities.

30. [e. Comply with Environmental Protection Regulations. Evaluate LBP debris in accordance with RCRA and comply with transportation, treatment, storage, and disposal requirements. Comply with CERCLA requirements if a reportable amount of hazardous debris is released. Comply with TSCA requirements for LBP activities. Ensure ambient air quality standards are not violated.

f. Identify, evaluate, and remediate past LBP hazards. Determine the use of LBP on facilities and the potential for LBP debris to have accumulated in the area surrounding facilities.

7. Responsibilities. The following functional area responsibilities are assigned to implement this policy.

a. Civil Engineering (AF/CE): Ensures that facilities are inspected on a prioritized basis for deteriorated painted surfaces, appropriate in-place management and abatement are performed, and occupant relocation actions are taken when an LBP hazard determination is made. Ensures that precautions for occupant, worker, and environmental protection requirements for proper disposal of LBP debris, and restrictions on lead in paints are included in all maintenance, repair, modification, renovation, and construction activities performed in-house or by contract or self-help. Ensures all lead-paint activities are performed by workers or designers certified by the appropriate agency. Plans for abatement of LBP when cost-effective during facility renovation and upgrade programs.

b. Medical Services (AFMOA/SG): Ensures that facilities are evaluated for LBP hazards on a prioritized basis and appropriate LBP hazard determinations are made. Ensures that investigations to determine the sources of elevated blood lead levels are performed. Provides consultation on and supports all activities which disturb or may disturb LBP including maintenance, repair, modification, renovation, in-place management, and abatement. Provides lead exposure prevention education to occupants of military family housing, facility managers, and other appropriate personnel.

c. Logistics (AF/LG): Ensures paints with lead above the regulated amount are not issued for use in any facility.

d. Other Functional Areas (AF/JA, SAF/PA, AF/MW): Ensure consultative services and other necessary support are provided to AF/CE and AF/SG for activities involving LBP.

8. Funding. Each Air Force organization will program and budget for their requirements using the applicable appropriations: Operations and Maintenance; Military Construction; Military Family Housing (MFH); Research, Development, Test and Evaluation; Defense Environmental Restoration Account; Medical; and other base tenant funding.

a. Table 1 and accompanying notes cite Element of Expense Investment Codes (EEICs) and Program Element Codes (PECs) used for the major activity categories outlined in this policy. These codes provide a mechanism to identify requirements in the budget advocacy process and capture expenditures during program execution.

b. In addition, installations must track in-house costs for all LBP activities. Each installation will assign at least three work orders, and others as applicable, for LBP activities:

O&M General Base Facilities
O&M Environmental
MFH

RDT&E General Base Facilities
OR RDT&E Environmental
MFH

(1) In-house costs to capture in these work orders include site visits, inspections, management, in-place controls, removal, and disposal. Also include all documentation, record keeping, special training, documentation of training, base awareness programs, environmental controls, and disposal documentation costs associated with LBP. Supplies, travel and the costs of moving out of LBP contaminated facilities into "clean" ones must also be collected.

(2) To ease recognition, the first two characters used in the description of these work orders should be "LB."

c. Major commands will separately identify LBP activities in their financial plans and provide full justification. The annual budget call letter from Air Staff will provide detailed instructions.

TABLE 1: FUNDING FOR LEAD-BASED PAINT REQUIREMENTS

Categories	Civil Engineering	Medical
FACILITY INSPECTION	X	
HAZARD EVALUATION		X
ABATEMENT/IN-PLACE MANAGEMENT	X	
DISPOSAL	X	
TRAINING/CERTIFICATION	X	
CLEANUP UNDER THE DEFENSE ENVIRONMENTAL RESTORATION ACCOUNT (DERA)	X	X

NOTES:

1) Element of Expense Investment Codes (EEICs) for LBP requirements will follow the standard Air Force three digit EEICs in accordance with AFR 700-20. The LBP sub-shred (suffix) will be added as follows and will apply within all PECs:

EEIC	
XXX41	LBP activities, DERA funded
XXX75	LBP activities, not DERA funded (for all EEICs except 534)
53476	LBP activities, not DERA funded (EEIC 534 only)

2) Program Element Codes (PECs) applicable to LBP requirements are as follows:

a) Costs for LBP activities associated with work or projects primarily justified for non-environmental reasons (renovation, upgrade, disposal, maintenance, repair, construction, etc) are not eligible for environmental compliance

funding. This work should be programmed and costed to the PEC for which the work is primarily justified. For work in this category, all the project costs, including LBP costs, must be within statutory and other approval limits.

b) The PEC for civil engineering environmental compliance requirements (other than MFH) is *****56F. This PEC will be restricted to those projects justified by the need to comply with environmental laws. Note, all civil engineering work categories listed in Table 1 are potentially eligible for environmental compliance funding (except for cleanup under DERA). The eligibility of environmental compliance funding will be updated as EPA promulgates its regulations.

c) MFH environmental compliance funding is tracked by EEIC under the following PECs (note civil engineering work in the Table 1 categories could fall into any of these PECs):

0808741F	Construction
0808742F	Improvements
0808744F	Leasing
0808745F	Operations
0808746F	Maintenance

d) The PEC for medical environmental compliance requirements is 0807756F. Both categories listed as medical in Table 1 are eligible for this funding code.

e) The PEC for DERA is 0708008F. If contamination is determined to have been caused by past practices and contamination is found to be above the maximum contaminant levels (MCLs), the funding of the cleanup may be eligible from the DERA account. Contact your Installation Restoration Program Manager for specific details, and note that all programming of funds for this account must be submitted to the Installation Restoration Program Manager.

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